

## Ortlieb, Erich

---

**From:** Richardson, Morgan  
**Sent:** Friday, February 27, 2015 11:09 AM  
**To:** Ortlieb, Erich  
**Subject:** FW: SBL39430 (DC Plastics) QA Review Findings

### Morgan A. Richardson

Environmental Scientist, Disaster Recovery Environmental  
D 1-225-388-3947 C 1-225-337-3707  
[Morgan.Richardson@aecom.com](mailto:Morgan.Richardson@aecom.com)

### AECOM

7389 Florida Boulevard, Suite 300, Baton Rouge, Louisiana 70806  
T 1-225-922-5700 F 1-225-922-5701  
[www.aecom.com](http://www.aecom.com)

---

**From:** Rock, Kenneth [<mailto:Kenneth.Rock@icfi.com>]  
**Sent:** Friday, February 27, 2015 11:06 AM  
**To:** Richardson, Morgan; Harrison, Karyn; Swick, Steve; DeVoe, Lauren  
**Cc:** Davis, Cindy; Lauren Keltos; Shawn Bulger; Kiser, Jonathan VL; Rickman, Brett; Lanza, Robert; NJERRQUESTIONS; Davis, Tim ([Tim.Davis@dep.nj.gov](mailto:Tim.Davis@dep.nj.gov)); Pettit, Chris; Greene, Robert; Malmi, Nick; Sherman, Steven  
**Subject:** RE: SBL39430 (DC Plastics) QA Review Findings

Hi, Morgan:

It was good talking with you about DC Plastics earlier this morning. As I mentioned, NJDEP's site visit of January 15, 2015 provided some useful information that we included in our comments on the CEST. Additional information about worker safety and health and needed air quality permits, taken directly from DEP's site visit comments, is provided below.

- 1) There were no employees in the facility, and no worker safety issues were observed. Their plan is to not operate until or only if their loan is approved.
- 2) An inventory of the production equipment was conducted and it was determined that DC Plastics needs to obtain 2 General Air Quality permits. One permit is required for the extruder and pneumatic conveyance equipment and one permit is needed for their storage silos. These permits are needed regardless of any new equipment that may be purchased with the new loan. We advised DC Plastics that once they obtain the final engineering specs for the new equipment, they will be required to obtain additional Air Quality permits for that equipment. (They explained that the new equipment will produce a 3 ply plastic bag - which is something new to them)

We hope this information will help you finalize your responses to ICF's comments of February 24. In the meantime, **can we count on URS submitting the revised materials by Monday, March 2?**

Please feel free to call me if you have any questions,

Ken R.

**Ken Rock, PMP** | Sr. Project Manager | 703.225.2193 | [krock@icfi.com](mailto:krock@icfi.com) | [icfi.com](http://icfi.com)

**From:** Sherman, Steven

**Sent:** Tuesday, February 24, 2015 9:26 AM

**To:** Harrison, Karyn; Swick, Steve; DeVoe, Lauren

**Cc:** Davis, Cindy; Lauren Keltos; Shawn Bulger; Rock, Kenneth; Kiser, Jonathan VL; Rickman, Brett; Key, Chantel; Rogers, John; Lanza, Robert; NJERRQUESTIONS; Davis, Tim ([Tim.Davis@dep.nj.gov](mailto:Tim.Davis@dep.nj.gov)); Pettit, Chris; Greene, Robert; Malmi, Nick

**Subject:** SBL39430 (DC Plastics) QA Review Findings

Hi Karyn, Lauren, and Steve:

ICF and DEP have completed our QA review of SBL39430. Our determination is that, to move this file forward, the following updates are needed:

1) **Description of the Proposed Project:**

- a) Please add additional language specifically classifying the various components of project improvement (e.g., major or minor rehabilitation, equipment reconstruction, etc.).
- b) Also provide clarifying language that, while the facility is currently operational producing plastic and garbage bags (i.e., as noted in the 4. Contamination and Toxic Substances section), capacity is diminished due to the storm damage. Also indicate what type of operations will come back on line as a result of the project improvements.
- c) Provide additional language describing the new equipment/machinery to be installed for the proposed project and reference the file support documentation.
- d) Clarify whether the equipment replacement would increase the production capacity of the factory or just restore the production capacity to what it was before the disaster. There is conflicting information in the ERR about whether there will be an increase in production capacity as a result of the project. The Compliance Documentation for the Noise Abatement section states that there will be no capacity increase, but the file "DCPlasticsEDANEPApplicationForm11\_V11\_32414.docx" states in response to question #11, "Change in Size or Capacity" that the production capacity of the facility would increase by 15% after the project is completed. Please resolve this conflicting information and provide appropriate documentation.
- e) Please add clarifying language stating that SUPERIOR-MPM LLC is the owner of the property shown on the Tax Record ([SBL39430TaxCard](#)) and that the project applicant, DC Plastic Products, LLC, leases the project property (if this is the case).

2) **Conditions for Approval.** This section is missing from the CEST. Please provide, incorporating all of the language from the updated **Summary of Findings and Conclusions, Required Mitigation and Project Modification Measures** section.

3) **Air Quality.** Indicate that the equipment currently on-site and to be purchased requires air permits. Add language in the Compliance Documentation section describing this requirement. Also add the following type language to the Conditions for Approval section and the Required Mitigation and Project Modification Measures section: "Obtain an air pollution control permit to construct and a certificate to operate for all equipment subject to N.J.A.C. 7:27-8.2(c)." Note that whether the project restores pre-disaster production capacity, or increases production capacity could affect the types of air permits needed, or whether the existing air permits for the facility remain valid.

4) **Contamination and Toxic Substances.**

- a) The Compliance Documentation section states that to be awarded the CDBG-DR Stronger NJ Business Loan Program grant, remedial investigation activities must be initiated immediately. Proof of commencement of RI activities as mentioned above must be provided. In addition, the remedial investigation must be completed by May 2016 (see SBL39430ToxicSuperiorMPM12.18.14).
- b) Add language in the Compliance Documentation section stating, “As shown in the “zoomed in” section of the map provided in the SBL39430ToxicHazardousandRadioactiveSubstancesMap file, the fourth site shown near the property is actually beyond the 3,000 foot distance of concern.
- c) The Compliance Documentation section states, “. . .those construction techniques that are feasible may be incorporated to reduce the risk of radon exposure.” On what basis is this statement being made? If there is no legal requirement or enforcement mechanism requiring such construction techniques (i.e., the project is not located in a Radon Zone 1), the language should be removed from the Compliance Documentation section.

5) **Endangered Species.** Provide language in the Compliance Documentation section noting that, while the address provided on the SBL39430CentroidsMap file indicates a property location of E 5<sup>th</sup> Street, the property address is actually 70-86 Hobart Street. In any event, the property boundary (shown in the aerial image) is accurate.

6) **Environmental Justice.** The last sentence of the Compliance Documentation section states, “Overall, the environmental impacts of the proposed action would be beneficial. . .” Provide additional language indicating how the project will be beneficial from an EJ environmental perspective (i.e., especially if there will ultimately be a capacity increase resulting from project funding).

7) **Noise Abatement and Control.** As noted in the Project Description section above, provide clarifying language about whether the equipment replacement would increase the production capacity of the factory or just restore the production capacity to what it was before the disaster. There is conflicting information in the ERR about whether the project will result in an increase in production capacity. The Compliance Documentation section for Noise Abatement indicates that there will be no capacity increase, but question #11 in the DCPlasticsEDANEPApplicationForm11\_V11\_32414 docx file indicates that there will be a 15% increase. Please note that a 15% increase in production capacity does not necessarily correlate to a 15% increase in impacts in each of these subject areas. It may be that the proposed 15% capacity increase does not have any substantive effect on noise (or air/wastewater/waste impacts), but in any case, the potential impacts of a 15% capacity increase, or lack thereof, should be documented in the ERR.

8) **Sole Source Aquifers.** Include and reference in the Compliance Documentation section the USEPA letter, dated August 13, 1996, regarding EPA Sole Source Aquifer Review of HUD Projects (referred to on Page 54 and provided as Appendix CC in the NJDEP CEST & EA Guidance Document).

9) **Wild and Scenic Rivers.** In the Compliance Documentation section, please add the following language from Page 64 of the NJDEP CEST & EA Guidance Document: “The project is not located within ¼ mile of a Wild and Scenic River stream bank, or within a one-mile radius of a designated Wild and Scenic River.”

10) **Summary of Findings and Conclusions, Required Mitigation and Project Modification Measures section.**

- a) There are a number of mitigation conditions applicable to this project that should be included in this section. Please repeat all approval conditions in all relevant sections and include all applicable conditions, particularly those relating to Air Quality, Hazardous/Toxics Materials, Worker Health and Safety, and Environmental Justice.

- b) Add to the Summary of Findings and Conclusions section (currently page 16) a separate section after Asbestos. The section title should be Air Quality Permits. Air Quality Permits:  
Be advised that any additional applicable equipment for this project, under N.J.A.C 7:27 subchapter 8, may require air permits.

Please submit a new version of the complete set of files, including the requested updates, to the Document Library by COB on January 26th, 2015.

Thanks for your attention to these comments.

Please let me know if you have any questions,

**Steven Sherman** | Associate, Environmental Planner | 609 403 7436 (o)

**ICF INTERNATIONAL** | [Steven.Sherman@icfi.com](mailto:Steven.Sherman@icfi.com) | [icfi.com](http://icfi.com) | Connect with us on [social media](#).

This e-mail and any attachments contain AECOM confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.