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February 14, 2020

via email

McDONALD'S USA, LLC
64 Harbor Drive
Hammonton, New Jersey 08037

Attention: Jonathan M. Baske P.E., PMP
Area Construction Manager

**Regarding: CONCLUSIONS & RECOMMENDATIONS
PHASE I ENVIRONMENTAL SITE ASSESSMENT
PROPOSED McDONALD'S REBUILD #29-0019
4295 & 4299 U.S. ROUTE 130
EDGEWATER PARK, BURLINGTON COUNTY, NEW JERSEY
WHITESTONE PROJECT NO.: EP2016942.000**

Dear Mr. Baske:

Whitestone Associates, Inc. (Whitestone) has prepared this correspondence to summarize the conclusions and recommendations of Whitestone's February 14, 2020 *Summary Report of Findings - Phase I Environmental Site Assessment* (ESA) for the above-referenced property. The Phase I ESA was prepared as part of environmental due diligence related to the proposed demolition and rebuild of McDonald's restaurant #29-0019 and incorporates findings of the due diligence investigations and regulated remediation activities conducted in 2011, 2014 and 2020 for the project.

SUMMARY OF RECOGNIZED ENVIRONMENTAL CONDITIONS (RECs)

This assessment revealed the following REC in connection with the subject property:

1. In 2020, Whitestone conducted a limited Phase II Site Investigation (SI) during geotechnical drilling and storm water management (SWM) area evaluation activities. As part of these efforts, a geophysical survey identified several anomalies including a potential underground storage tank (UST), multiple suspected drainage structures, and remnant utility lines. In addition, soil samples collected adjacent to suspected subsurface drainage features detected select base neutral (BN) organic compounds at concentrations exceeding New Jersey Department of Environmental Protection (NJDEP) standards. Accordingly, additional NJDEP reporting and remediation activities are warranted.

SUMMARY OF CONTROLLED RECs (CRECs)

This assessment revealed no CRECs in connection with the subject property.

Other Office Locations:

WARREN, NJ
908.668.7777

SOUTHBOROUGH, MA
508.485.0755

ROCKY HILL, CT
860.726.7889

WALL, NJ
732.592.2101

EVERGREEN, CO
303.670.6905

SUMMARY OF HISTORIC RECs (HRECs)

This assessment revealed the following HREC in connection with the subject property:

1. In 2014, Whitestone managed the closure (via removal) of one regulated 12,000-gallon unleaded gasoline UST, one regulated 10,000-gallon unleaded gasoline UST, and one regulated 10,000-gallon diesel UST associated with the former Edgewater Park Shell gasoline service station. A discharge from a fuel dispenser had previously been reported in 2006. Although evidence of a discharge or corrosion holes were not observed in the tanks upon removal from the ground, an additional discharge from dispenser piping was reported to NJDEP's spill hotline. Petroleum-impacted soil was excavated and removed for off-site disposal, and the laboratory analytical data for the post-excavation samples documented compliance with NJDEP cleanup standards. On October 8, 2014, Whitestone's Licensed Site Remediation Professional (LSRP) for the subject project issued an *Unrestricted-Use, Area of Concern-Specific Response Action Outcome* (RAO) authorizing regulatory closure of Incident Nos. 06-09-05-1235-40 and 14-01-23-1336-14. Accordingly, no further actions are required.

SUMMARY OF BUSINESS ENVIRONMENTAL RISKS (BERs)

The following BERs were documented during the Phase I ESA:

1. Whitestone's limited Phase II SI and geotechnical field activities encountered fill material generally consisting of brown sand with silt and gravel to a maximum depth of 9.0 feet below ground surface (fbgs). Select borings also encountered debris material consisting of trace brick and concrete fragments.
2. Although not encountered during prior investigations, the existing or historic developments at the subject property could have utilized additional heating oil or other USTs, septic systems, cisterns and/or water supply wells, and such features could remain at the site.
3. One approximately 200-gallon used cooking oil aboveground storage tank (AST) and one approximately 200-gallon virgin cooking oil AST were observed in the site structure during Whitestone's site reconnaissance. The ASTs are connected to a system that transports new and used fryer oil from the vessels to the kitchen area. The vessels are filled or emptied on an as-needed basis. The ASTs appeared to be used in an environmentally sound fashion with no evidence of release.
4. During Whitestone's site reconnaissance, manhole covers associated with a subsurface grease trap were observed outside the northwestern exterior of the building.
5. One mobile air compressor was observed in the basement of the site structure with no evidence of staining or release.
6. Three bulk storage containers of carbon dioxide refrigerated liquid/syrup and three carbon dioxide cylinders associated with fountain beverage machines were observed in the building during Whitestone's site reconnaissance. These materials were stored in an environmentally sound fashion with no evidence of release.

7. During Whitestone's site reconnaissance, three PSE&G-owned, pole-mounted electric transformers were observed along the southwestern property boundary and two additional pole-mounted transformers were observed along the northeastern property boundary. No evidence of staining or releases was observed in connection with these transformers. Based on the age of the site structure (1963), the dielectric fluid in these transformers could contain polychlorinated biphenyls (PCBs).
8. Fluorescent light fixtures were observed throughout the site structure during Whitestone's site reconnaissance. Based on the age of the site structure (1963), the ballasts in these light fixtures could contain PCBs.
9. The on-site structure was constructed in 1963. The presence of asbestos-containing materials (ACM) has been documented, and lead-based paints (LBP) should be anticipated.
10. The subject property historically was utilized for agricultural purposes from at least 1931 through the 1950s. Historic application of pesticides, herbicides and/or fertilizers could have resulted in residual contamination to surficial and shallow subsurface soils.
11. Multiple federal and state database listed sites with documented sources of contamination have been identified in the vicinity of the subject property, and adverse impacts to subsurface conditions due to contaminant migration from off-site sources are possible.

CONCLUSIONS AND RECOMMENDATIONS – REC

1. The BN-contaminated soils identified in borings B-4 and B-13 must be reported to NJDEP and remediated at the direction of the LSRP pursuant to the *Site Remediation Reform Act* (N.J.S.A. 58:10C-1 et seq).

The anomalies identified during the geophysical survey should be excavated to evaluate potential closure and remediation requirements. All USTs and/or other subsurface features of potential environmental concern must be cleaned and removed in accordance with NJDEP protocol and applicable waste management regulations. Subsurface evaluation and sampling activities should be conducted during all such closures. If additional areas of contamination above standards are documented, NJDEP must be notified and additional investigation, remediation, and regulatory reporting activities will be required.

When a site enters a NJDEP regulatory program, the sampling of building materials (concrete, brick, etc.) will be required prior to the off-site disposal of renovation and/or demolition debris/materials in accordance with NJDEP guidance (if necessary). If documented to be contaminated, regulated disposal of building materials will be required.

To satisfy the NJDEP's *Fill Material Guidance for SRP Sites*, representative soil sampling will be required from proposed clean fill material prior to importing the material for use on site. If the material cannot be documented to meet NJDEP clean fill objectives, different source(s) of material must be identified and additional sampling conducted.

In light of the documented soil contamination at the subject property, special considerations should be given with respect to worker health and safety during future site redevelopment activities. A

site-specific *Health & Safety Plan* and *Soil Management Plan* should be prepared for on-site remediation or construction activities involving soil or groundwater management and subsurface excavation activities.

In the event that soil excavated or encountered during any future site redevelopment activities exhibits evidence of contamination, the soil should be segregated, characterized, and managed off-site in accordance with applicable state and federal waste management regulations unless contaminant concentrations allow such material to remain on site. Subsurface impacts (if encountered) should be reported and addressed (as required) by state regulations.

CONCLUSIONS AND RECOMMENDATIONS – BERS

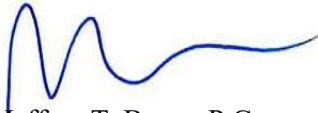
1. If export of surplus soil/fill material is anticipated during future construction, supplemental sampling will be warranted to evaluate management alternatives based on the regulatory status of the site.
2. If encountered during future ground disrupting site work, all USTs must be removed and evaluated for contamination in accordance with NJDEP regulations, septic components must be closed in accordance with local Health Department guidelines, and wells must be abandoned by a New Jersey-licensed driller.
3. The used cooking oil and virgin cooking oil ASTs should be emptied, cleaned, and removed in accordance with applicable waste management regulations prior to demolition.
4. The grease trap should be emptied, cleaned, and removed in accordance with applicable waste management and health department regulations prior to site redevelopment.
5. The air compressor should be managed off-site in accordance with applicable waste management regulations prior to demolition.
6. The three bulk storage containers of carbon dioxide refrigerated liquid/syrup and three compressed air cylinders associated with fountain beverage machines should be purged and/or returned to the distributor prior to demolition.
7. If not intended for continued use, the pole-mounted electric transformers should be evaluated for PCB content and removed by PSE&G, the electric utility provider, for off-site management in accordance with applicable waste management regulations prior to site redevelopment.
8. Fluorescent light fixtures should be evaluated for PCB content and removed for off-site disposal in accordance with applicable waste management regulations prior to demolition.
9. An updated survey for ACM was conducted in conjunction with the Phase I ESA. Comprehensive findings and recommendations associated with the ACM survey have been issued under separate cover. Although lead abatement is not required, regulated management of demolition debris may be warranted. A LBP survey could be conducted prior to the demolition to evaluate worker health and safety considerations.

10. No further action is proposed to address the subject property's historic agricultural use unless export of surplus soil is anticipated during construction. If export is anticipated, supplemental sampling will be required by the recipient facility to certify the material as clean fill.
11. Although future property owners/tenants would not be liable for contamination migrating from off-site sources, the threat of vapor intrusion may warrant investigation and/or mitigation in conjunction with site redevelopment. Existing conditions could be evaluated during remediation of the BN-impacted soils referenced above.

Hopefully this information is useful for site planning purposes. Please contact us with any questions regarding these findings.

Sincerely,

WHITESTONE ASSOCIATES, INC.



Jeffrey T. Bauer, P.G.
Principal, Environmental Services



Eric P. Harris
Environmental Specialist