



**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc—Camden, NJ
Narrative Information Sheet**

Pertinent applicant information follows:

- | | |
|----------------------------------|--|
| 1. Applicant Information: | Camden Lutheran Housing, Inc.
800 Galindez Court, #101
Camden, NJ 08102 |
| 2. Funding Requested: | a. Grant Type—Single Site Cleanup
b. Federal Funds Requested—\$1,000,000 |
| 3. Location: | a. City of Camden
b. Camden County
c. New Jersey |
| 4. Property Information: | Front and Elm Site (AKA Former West Jersey Paper Manufacturing Site)
NE Elm & Front Streets (Block 44, Lot 71)
Camden, NJ 08102 |
| 5. Contacts: | <p>a. Project Director
Brandi Johnson, Executive Director
Camden Lutheran Housing, Inc.
800 Galindez Court
Camden, NJ 08102
bjohnson@clhi.org</p> <p>b. Chief Executive
Brandi Johnson, Executive Director
Camden Lutheran Housing, Inc.
800 Galindez Court
Camden, NJ 08102
bjohnson@clhi.org</p> |
| 6. Population: | The population for the city in which the site is located is 71,791 (U.S. Census Bureau 2020 Decennial Census data for Camden, NJ) |

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7. Other Factors:

Other Factors Information	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The proposed site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation / reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	NA
The proposed site(s) is in a federally designated flood plain.	2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
The target area(s) is located within a community in which a coal-fired powerplant has recently closed (2013 or later) or is closing.	NA

8. Releasing Copies of Applications

No portions of the application are considered confidential, privileged, or sensitive. It is understood that the application may be made available to the public by EPA.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area: Camden, New Jersey is located between the Delaware and Cooper Rivers, across from Philadelphia, PA. Industrial development came early to Camden, taking advantage of our waterfront and easy access to New York, agricultural South Jersey, Philadelphia, and points west. By World War II, Camden was home to the largest shipyard in the world, the iconic Campbell Soup company, and RCA Victor, once the world's largest manufacturer of phonographs. These jobs attracted waves of immigrants and the City's diversity and population grew until the 1950s when new technologies and competition took industries elsewhere. By the end of the 20th century, racial tensions and political corruption had hollowed out the city. This industrial rise and decline has saddled the city with an overwhelming number of brownfield sites. According to the New Jersey Department of Environmental Protection (NJDEP) Known Contaminated Sites list, there are 212 confirmed brownfield sites in the 6,697-acre City of Camden. This high concentration of brownfield sites equates to one brownfield site for every 31 acres. These sites represent lost tax revenue and lost job opportunities resulting in the City's inability to overcome chronic issues of poverty, unemployment, public health, and safety.

The Target Area is the North Camden neighborhood, an area bounded by the Delaware River at its northern and western edges, the Ben Franklin Bridge to the south and the Cooper River to the east. The land use of the North Camden neighborhood is roughly 20% residential, 24% industrial and 25% vacant land and buildings. Institutional, parks and public utilities make up a majority of the remaining land.¹ For decades, over 750 vacant properties, mostly brownfields, have endangered the health and safety of the community and the community has responded by taking action. Camden Lutheran Housing, Inc. (CLHI) is a 501c3 nonprofit dedicated to community development in North Camden. This grant will help facilitate addressing the brownfield and environmental justice issues in Camden, by bringing people together to rebuild North Camden physically, socially, and economically by facilitating affordable housing development.

ii. Description of the Proposed Brownfield Site(s): The North Camden site targeted for cleanup is located at North Front Street & Elm Street (Block 44, Lot 71) and is in census tract (CT) 6007. The property was first developed circa 1850 as the West Jersey Paper Manufacturing Company, who owned/operated the site until 1967. Latex Fiber Industries, Inc. operated the site from 1967 to 1974. Both companies were engaged in paper milling and pulp operations. The entire area of the site has been subject to industrial operations including the use and storage of #6 fuel oil and the storage of other oils and chemicals.

In 1974, the City demolished the buildings, and, in 1976, foreclosed on the property. Results from preliminary assessment and remediation activities conducted by the New Jersey Department of Environmental Protection (NJDEP) between 1988 and 1997, showed that historic operations left contaminants in the soil, including lead, cadmium, zinc, arsenic, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs), at concentrations above applicable state remediation standards. Recent site investigations undertaken by CLHI found the site contains large amounts of fill and buried debris that is also contaminated predominantly by PAHs and metals at concentrations above state remediation standards. Contaminated debris extends to a

¹ 2022 North Camden Neighborhood Plan p.16

depth of 5 feet below grade and hot spot impacted soils are present to a maximum depth of 12 feet below grade.

The site has been an unused, vacant lot since the 1974 demolition, almost 50 years ago. It is surrounded by residential housing on all sides, with a childcare facility, grocery store and a public park in close proximity. The site is approximately 10 feet above mean sea level, sloping gradually towards the Delaware River, which is less than ¼ mile away. The western portion of the property is in the FEMA 1% annual chance flood hazard area.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: CLHI's redevelopment plan for the property is the construction of 15 much needed affordable, single-family homes. This development is Phase III of a larger in-fill housing initiative to create 42 homes in North Camden. Those units that will be constructed inside the 1% FEMA flood hazard area will have garages on the first floor, and living space and utilities on the second and third floors.

The *North Camden Neighborhood Plan Update (2022)*, recognizes progress on strategic investment in new affordable housing infill on distressed blocks over the last 14 years, led by the 36 new homes constructed by CHLI in other North Camden projects. However, this neighborhood plan that was developed via an intensive residential stakeholder engagement process, notes that more work is needed to continue to build the residential community, especially since approximately 25% of North Camden is comprised of vacant lots. The plan also underscores that homeownership continues to be unattainable for many, and the proportion of people who own their own homes declined by 10 % between 2010 and 2019. According to community interviews and outreach done as part of the Plan's update, 88% of residents would continue to live in North Camden if given the choice, but housing costs are rising far more quickly than incomes. Residents cited displacement amid rising costs as one of their primary concerns. Another of the key takeaways from the community engagement process for the plan was that residents feel strongly that environmental issues and injustices in the neighborhood such as the proliferation of brownfields, environmental contamination, and ecological degradation along the waterfront must be addressed. The award of this cleanup grant would support the community's reuse vision.

The City of Camden's most recent master plan, *FutureCAMDEN (2002)*, highlights affordable housing as one of the most important goals for North Camden, including census tract 6007, identifying the neighborhood as one of the poorest in the city. Medium-density residential land use through redevelopment, new construction infill, and rehabilitation of existing housing stock were recommended. North Camden was identified as an area that should be prioritized for revitalization in general and for housing redevelopment in particular, because of the neighborhood's facility-based anchors and the presence of non-profit housing organizations such as CLHI. The plan calls for continued North Camden affordable housing development sponsored by CLHI in the vicinity of Front and Elm Streets, with the total need for new housing units – both affordable and market-rate – being estimated at 250.

ii. Outcomes and Benefits of Reuse Strategy: The outcomes and benefits of the proposed reuse strategy include:

- Remediating 0.62 acres of industrial contamination within a residential neighborhood and preventing surficial contamination from being disbursed throughout the neighborhood during flooding events.

- Going the extra effort of remediating the site to unrestricted use will eliminate the need for an engineered cap. This provides for a more resilient outcome. Should flooding occur, there will be no threat of a catastrophic failure of a cap that would lead to release of contamination.
- Design includes resiliency elements consistent with the City Floodplain Management regulations, including using the ground floor solely for parking, storage and building access; foundation walls with flood vents; critical equipment for electrical, mechanical, and plumbing services above flood elevation; backflow preventers in sanitary and storm lines; and maximization of exterior pervious surfaces to reduce runoff.
- Improve the housing stock with 15 new affordable housing units creating approximately 25,600 sq ft of new residential space that will provide for residents to stay in the neighborhood.
- Providing access to the benefits of home ownership/creation of generational wealth for a population that cannot otherwise afford to buy housing (see Sec 2 for housing burden data);
- Construction funding requires that all homes use appliances and HVAC systems with Energy Star certifications.
- Bringing the property into productive use for the city resulting in the collection of taxes projected at \$55,862/year on a site that has generated no tax revenue for the last 49 years.

c. Strategy for Leveraging Resources

(i) Resources Needed for Site Characterization: With the 2023 Remedial Investigation for soil and groundwater, all assessment work has been completed.

(ii) Resources Needed for Site Remediation: For the remediation, CLHI will apply for a \$250,000 state Hazardous Discharge Site Remediation Fund (HDSRF) unrestricted use cleanup grant. CLHI will also make use of the Camden Redevelopment Agency’s (CRA) EPA RLF loan program. In addition, CLHI has secured a 2022 allocation and expects a March 2024 award of state Neighborhood Revitalization Tax Credit grant funding totaling \$541,500. This funding will be used to address any remediation shortfall not covered by the CRA loan or the EPA Cleanup Grant.

(iii) Resources Needed for Site Reuse: Project redevelopment costs are estimated to total \$8.7M. CLHI can access construction financing in the form of a New Jersey Community Capital loan (\$1.5M) and a state Affordable Housing Trust Fund grant (\$7.3M) but cannot receive funding commitments for either until the site has been remediated.

Funding Source and Amount	Section	Status	Funding Uses
State HDSRF	1.c.i	Secured & Expended	\$66,325 for PA/SI
State HDSRF	1.c.i	Secured & Expended	\$98,462 for RI
State HDSRF (non-competitive)	1.c.ii	Unsecured	\$250,000 for Remediation
CRA EPA RLF Bridge Loan	1.c.ii	Unsecured	\$250,000 for Remediation
State Neighborhood Revitalization Tax Credit Grant (2022, 2024)	1.c.ii; 1.c.iii	2022 Secured 2024 Unsecured	\$190,000 (2022); \$351,500 (Expected award March 2024)
NJ Community Capital Loan	1.c.iii	Unsecured	\$1.5M for construction
NJ Affordable Housing Tax Credit Grant	1.c.iii	Unsecured	\$7.3M for construction

iv. Use of Existing Infrastructure: The site is located within a built-out urban area already well-served by water, sewer, gas, electricity, telecommunications fibers, and roads. There is existing capacity in these systems, which were designed to serve the City when it had a significantly larger population and more industrial facilities. Any site-specific infrastructure needs to hook into City

water / sewer lines are to be funded as part of the redevelopment. The Ben Franklin Bridge, a major regional thoroughfare connecting New Jersey to Philadelphia, is immediately to the south of the site. A commuter light rail line runs along the Bridge with a transit stop a half a mile away.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding: Camden is one of the poorest cities in the nation. According to 2016-2020 American Community Survey (ACS) 5-year estimates, 31% of families in Camden live in poverty, compared to just 7% and 9% in New Jersey and the nation, respectively. The rate of individuals in poverty in Camden is 34%, and both per capita and median household income are less than half the national and state averages. For the 1,516 people and 465 households in census tract 6007, poverty and income numbers are even more alarming, with 46% of residents living in poverty and 45% of families in poverty. Like the City, 94% of the population are people of color. In addition, in CT 6007, more people are linguistically isolated, and a very large percentage of the population has less than a high school education (almost 50%, compared to 11% in the nation and 10% statewide).

Demographic	CT 6007	Camden	Statewide	US
People of Color	94%	94%	45%	40%
People in poverty	46%	34%	10%	13%
Both in poverty and 65+ yrs	7%	3%	1%	1%
Families in poverty	45%	31%	7%	9%
Households receiving Food Stamp/SNAP	40%	40%	8%	11%
Less than HS education (25+ yrs)	49%	32%	10%	11%
Unemployment rate	11%	14%	5.4%	5.5%
Persons with disabilities	21%	21%	14%	13%
Per capita income	\$14,808	\$16,171	\$44,153	\$35,384
Median household income	\$32,465	\$32,667	\$96,879	\$74,543
Owner-occupied housing	37%	43%	67%	66%

Source: US Census ACS 2016-2020 5-year estimates, Headwaters Economics, US EPA EJScreen

Most important for the CLHI site is the housing burden evaluation for the project. Recent North Camden sales in the area depict rising housing values. Just a few blocks away, two comparable three-bedroom homes, both older and in need of moderate renovations, are currently listed on MLS for \$139,000 and \$198,000, respectively. Given today’s interest rates, a household needs to earn between at least \$47,000 and \$68,000 annually, well beyond Camden’s median household income, to be able to afford the value of these homes.

Homeownership is a significant vehicle for wealth building. The New Jersey Institute for Social Justice in 2022 released “Making the Two New Jerseys One: Closing the \$300,000 Racial Wealth Gap in the Garden State”. The new report reveals that while New Jersey is one of the most prosperous states in the nation, it is also characterized by some of the starkest racial and economic inequities. The median household wealth of white families in New Jersey is \$322,500,

compared to just \$17,700 and \$26,100 for Black and Latina/o families, respectively. Given that the demographic makeup of North Camden is 94% people of color, this opportunity for wealth creation will be offered to the families that are in need of it most.

ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations: In addition to its high rates of poverty, Camden is home to many sensitive populations living near identified brownfield sites. These populations include:

- Minority populations: According to the 2016-2020 ACS 5-year estimates, minorities make up 94% of the population in Camden and 94% of CT 6007, compared to 45% in the state and 40% in the nation. According to EJSscreen, 82% of the population in CT 6007 is Hispanic, and in 17% percent of households no one over the age 14 is fluent in English. Language barriers make it difficult to obtain medical and social services and can limit awareness of the environmental dangers of a neighborhood's brownfields.
- Individuals with disabilities: Both Camden as a whole and CT 6007 have a high population of residents with disabilities. In CT 6007, the percentage of non-institutionalized individuals with a disability (18.2%) is almost six percentage points higher than the rate for the nation (12.7%) and eight percentage points higher than the state of NJ (10.4%).
- Children: The median age in CT 6007 is just 30.7, which is ten years younger than the state average and 8 years younger than the national average. 37.4% of the tract's population is under 18 – far higher than the state and national averages of approximately 22%. Even more striking, 15% of residents are younger than 5 years old, which is more than double the state and national averages of approximately 6%. Children during the early years of physical and mental development are the most susceptible to environmental toxins, and this is a very large sensitive population in CT 6007.
- Pregnant women: According to the most recent data available (US Census for 2020 on births in the past year), fertility rates are far higher in CT 6007 (8.4%) compared to the nation (5.2%), New Jersey (4.9%), and even the City of Camden as a whole (5.4%). Living in an area with a high environmental burden increases the risk of birth defects and infant health issues.
- Housing-cost burdened households: About 30% of renters and 47% of homeowners (who have a mortgage) in CT 6007 pay more than 30% of gross income in rent or a mortgage, contributing to the fact that 40% of residents received food stamp/SNAP benefits in 2020.

According to the 2022 [Camden County Community Health Assessment](#), Camden County ranks 20th out of 21 New Jersey counties in terms of overall health outcomes and quality of life. Residents of the project area's zip code, 08102, are most at risk for health disparities owing to "social determinants of health" such as the high percentage of Black and Hispanic residents, non-English-speaking residents, families in poverty, families with children in poverty, single female householders with children, unemployed people, and residents with less than a high school diploma. When comparing the Community Need Indexes for Camden's four zip codes, the Assessment found the highest need in zip code 08102, where population in poverty, children in poverty, population with less than a high school diploma, and population without health insurance were highest. According to the US Health Resources & Services Administration, CT 6007 is also identified as a Medically Underserved Area. The projected reuse will facilitate the reduction of threats to sensitive populations by providing them with home ownership opportunities of safe and affordable housing and removal of an existing source of contamination.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:

According to the US Health Resources & Services Administration, infant and maternal health statistics are worse in Camden County than the national average: 9.1% of babies are born with low birth weights (compared to the US average of 8%), and the infant mortality rate in the County is 6.9 per 1,000 (vs. 5.6 per 1,000 in the US). Deduced infant mortality rates for CT 6007 are even more concerning. According to the March of Dimes, in Camden County babies born to White mothers have an infant mortality rate of 3.4 per 1,000 live births, but babies born to women of color such as the vast majority of women in CT 6007, have mortality rates ranging from 5.5 - 9.1.

Camden County also has a higher incidence of several types of cancer compared to the state. For example, a higher percentage of people in the county are diagnosed with urinary and bladder cancer, esophageal cancer, kidney and renal cancer, liver cancer, lung cancer, mesothelioma, prostate cancer, and thyroid cancer (New Jersey State Health Assessment Data). For invasive cancers overall, Camden County had an incidence rate of 524.6 per 100,000 in 2018, compared to 436.8 for the nation and 479.8 for New Jersey. Cancer death rates are also higher, especially among Camden County’s Black and Hispanic residents (2022 Camden County Community Health Assessment). Respiratory illnesses are also prevalent, and CT6007 is in the 96th percentile for asthma, due to a range of contributing factors that include environmental pollutants and the city’s aging housing stock. Over 86% of housing units in the City of Camden were built before 1980, increasing the risk of exposure to lead paint – particularly in poor neighborhoods where a significant number of homes are dilapidated and in need of repair. According to the 2022 Camden County Community Health Assessment, in 2018 more than 12% of adults in the City of Camden had been diagnosed with asthma (data is not available for children). The projected reuse will facilitate addressing adverse health conditions by the removal of an existing source of contamination and providing residences that are alternatives to the city’s aging housing stock.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues: The entire City of Camden is a nonattainment

EJScreen Index	Percentile in US
Particulate Matter 2.5	89
Ozone	97
Diesel Particulate Matter	96
Air Toxics Cancer Risk	93
Air Toxics Respiratory HI	95
Toxic Releases to Air	93
Traffic Proximity	97
Lead Paint	97
Superfund Proximity	98
RMP Facility Proximity	95
Hazardous Waste Proximity	98
Underground Storage Tanks	97
Wastewater Discharge	95

EJScreen results for Census Tract 6007

area for ground-level ozone according to the National Ambient Air Quality Standards for both 1997 and 2008. CT 6007 is in the 97th percentile for ozone compared to the nation according to EJScreen. The Cooper River, which flows along the western boundary of CT 6007, is classified as an impaired water body (EJScreen). Partly because CT 6007 is in the 97th percentile for traffic proximity, the census tract is in the 96th percentile compared to the nation for diesel particulate matter. According to EPA’s

EJScreen, we score at or above the 93rd percentile in 12 out of 13 measures of environmental justice.

Camden contains significant environmental burdens, especially when compared with suburban parts of Camden County. Indeed, Camden is the poster child for environmental injustice, with residents disproportionately impacted by government policies that sited hazardous operations

including a county incinerator and a county sewage treatment plant whose odors have adversely impacted the targeted area.

CT 6007 is identified as disadvantaged by the Climate and Economic Justice Screening Tool, with 4 categories that meet the criteria (in addition to the 95th percentile for low-income households):

Climate Change	Projected risk to properties from projected floods, from tides, rain, riverine and storm surges within 30 years
Housing	Historic underinvestment (historically high barriers to accessing home loans); High proportion of homes that are likely to have lead paint
Legacy Pollution	Proximity to hazardous waste facilities; Proximity to Superfund sites
Workforce Development	Linguistic isolation; Low median income; High poverty; Very high proportion of people ages 25 years or older whose educational attainment is less than a high school diploma

(b) Advancing Environmental Justice: The remediation of the site that has remained a blight in this low-income residential area for almost 50 years would serve to remove contamination and support returning the land to productive use. The new housing will be affordable to current residents. Redevelopment of this site will actively address environmental injustice as it will create an opportunity for safe and healthy new housing for existing community residents, safeguarding them from being displaced in an area becoming more unaffordable for existing residents.

b. Community Engagement

Since the 1990s, the North Camden neighborhood has organized and taken action to address its community issues through collective planning and implementation. The North Camden Stakeholder Committee meets monthly, is open to all residents, and serves as a forum to share information and field questions about the project. The following list is a subset of this group who are responsible for ensuring that residents have a meaningful voice as the project unfolds.

i. Project Involvement and ii. Project Roles:

Stakeholder	Point of Contact	Project Involvement
Camden Community Partnership	Joe Myers, COO myers@camdencpinc.com 856-757-9154	Help to facilitate neighborhood planning efforts and residential engagement.
Camden Redevelopment Agency	Olivette Simpson, Interim Ex. Director olsimpso@ci.camden.nj.us 856-757-7600	Confer redevelopment authority for affordable housing projects
Respond, Inc.	Vance Lofton, vlofton@respondincnj.org , 856-365-4403	Sharing project information and meeting details with families
Resident	Tameeka Mason, [REDACTED],	Advising, event planning, liaison with school district, sharing project updates and communication with local families
Resident	Joseph Rodriguez, [REDACTED] [REDACTED]	Facilitating meetings with community
Stakeholder, Realtor	Tamie Pettiford, [REDACTED] [REDACTED]	Advising on educational activities for students and potential homebuyers

iii. Incorporating Community Input: CHLI has been discussing the reuse of this site for affordable housing with neighborhood stakeholders for decades. CHLI will continue outreach efforts with the partners listed above, to ensure the maximum number of people are aware of opportunities

to participate. Standard engagement practice for our community meetings includes texting stakeholders and residents, posting the information on Facebook and Instagram, hand delivery of meeting flyers and an MailChimp email blast. All information about the project is made available in CHLI’s lobby. If funded, a sign in both English and Spanish will be posted at the site providing the location of a document repository and a contact for information about the remediation. Resident concerns and input are taken very seriously, and multiple opportunities will be provided to discuss the remediation plan and its timeline. Meetings will be held both in person and virtually, and information will be provided to project partners for posting on websites, social media, and in community news blasts.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Given the site is to be redeveloped for individual ownership affordable housing, the site will be remediated to unrestricted use criteria so that no engineering or institutional controls will be needed. Remedial activities will involve removal and disposal of 1,500 tons of buried contaminated debris and 7,660 tons of contaminated soils. Given the shallow nature of groundwater at the site, dewatering and its disposal during the remediation may be needed. The subsurface debris, contaminated soil, and dewatering material will all be subjected to waste classification criteria to ensure the material is properly disposed.

b. Description of Tasks/Activities and Outputs

Task 1: Program Management and Outreach
i. Project Implementation: EPA funded activities include procuring a Qualified Environmental Professional (QEP) firm and a grant manager to perform grant budget tracking, reporting activities and support for community outreach meetings. Travel is for CLHI staff to attend an EPA brownfield conference. Non-EPA funded activities estimated at \$10,000 include CLHI staff in-kind contributions in the form of procurement of contractors/consultants, programmatic oversight of the grant, maintaining the public document repository, and community outreach.
ii. Anticipated Project Schedule: Duration of the Cooperative Agreement Performance Period
iii. Task/Activity Lead: CLHI Project Director with support from grant manager and project staff.
iv. Outputs: Conferences attended; ACRES reporting; Quarterly, MBE/WBE, and Financial Reports; Community Involvement Plan; Community Meetings; Request for proposals issued; grant closeout.
Task 2: Project Engineering
i. Project Implementation: EPA funded activities include QEP oversight and management of the remediation contractor, and preparation of the Remedial Action Report. The QEP will develop an invitation to bid package, conduct third party monitoring and oversight of the remediation contractor, and coordinate with regulatory agencies.
ii. Anticipated Project Schedule: Year 1 to 4
iii. Task/Activity Lead: QEP that can provide expertise not existing in-house with the grant recipient
iv. Outputs: Final ABCA; Invitations for Bid issued; QAPPs Prepared; and Regulatory Reports submitted.
Task 3: Remediation
i. Project Implementation: EPA funded activities include a procured contractor will perform the waste classification, secure permits, site clearance, dewatering activities, and site remediation.
ii. Anticipated Project Schedule: Year 2 to 3
iii. Task/Activity Lead: Contractor to provide cleanup expertise not available in-house with grant recipient
iv. Outputs: Amount of contaminated material removed and disposed; Acres remediated; Remedial Action Outcome; Temporary jobs created

c. Cost Estimates

Budget Categories	Project Tasks			
	Task 1 Program Management & Outreach	Task 2 Project Engineering	Task 3 Remediation	Total
Personnel				\$0
Fringe Benefits				\$0
Travel	\$2,000			\$2,000
Supplies	\$1,200			\$1,200
Contractual	\$20,000	\$86,600		\$106,600
Construction	\$0	\$0	\$887,200	\$887,200
Other		\$3,000		\$3,000
Total Direct	\$23,200	\$89,600	\$887,200	\$1,000,000
Total Indirect	\$0	\$0	\$0	\$0
BUDGET TOTAL	\$23,200	\$89,600	\$887,200	\$1,000,000

Task 1 Budget - Program Management and Outreach				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual Grant Management Consultant	4	YR	\$5,000	\$20,000
Supplies: signage, handouts, etc.	1	LS	\$1,200	\$1,200
Travel: EPA conference attendance	1	EACH	\$2,000	\$2,000
Task 1 Total:				\$23,200
Task 2 Budget – Project Engineering				
Item	Qty.	Unit	Unit Cost	Subtotal
Contractual: Remedial Action Workplan	1	EACH	\$5,000	\$5,000
Contractual: Remedial Action Report / RAO	1	EACH	\$10,000	\$10,000
Other: NJDEP Annual Remediation Fees - 3 years	1	EACH	\$3,000	\$3,000
Contractual: NJDEP Forms and Certifications	1	EACH	\$2,000	\$2,000
Contractual: Public Notification	1	EACH	\$500	\$500
Contractual: HASP	1	EACH	\$1,500	\$1,500
Contractual: QAPP	1	EACH	\$2,000	\$2,000
Contractual: Project Engineer/Geologist	20	DAY	\$1,000	\$20,000
Contractual: Field Technician	20	DAY	\$880	\$17,600
Contractual: Oversight of Remediation Contractor	240	Hrs	\$75	\$18,000
Contractual: Prepare Remediation Bid Specification	1	LS	\$10,000	\$10,000
Task 2 Total:				\$89,600
Task 3 Budget – Remediation				
Item	Qty.	Unit	Unit Cost	Subtotal
Construction: Permits, mobilization / demobilization	1	LS	\$25,000	\$25,000
Construction: Concrete debris characterization	20	Sample	\$350	\$7,000
Construction: Concrete debris excavation, crushing and stockpiling	1500	TON	\$35	\$52,500
Construction: Concrete debris disposal	1500	TON	\$125	\$187,500
Construction: Soil excavation, transportation and disposal	7660	TON	\$110	\$842,600
Construction: Dewatering with permitted stormwater discharge	1	LS	\$5,500	\$5,500
Construction: Post-excavation testing	12	EA	\$150	\$1,800
Construction: Decommission Monitoring Wells	5	EA	\$1,250	\$6,250
Construction: Backfill Clean Fill	6200	TON	\$35	\$217,000
Construction: Final As-built Survey	1	LS	\$2,000	\$2,000
Task 3 Total:				\$1,347,150
			TOTAL	\$1,459,950
TOTAL TO BE FUNDED BY EPA GRANT				\$ 1,000,000

d. Plan to Measure and Evaluate Environmental Progress and Results

CHLI will maintain close coordination with all work to be funded under this project and will pay careful attention to tracking important EPA output metrics as well as funding leveraged,

acres/number of buildings addressed, and jobs created primarily by utilizing EPA's ACRES system. CHLI will monitor project progress through documentation provided by all contractors and consultants and will provide this information to the EPA through regularly scheduled quarterly meetings with the EPA Project Officer and other requisite reporting efforts.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff: CLHI has been serving the North Camden neighborhood since 1986 and functions as its primary grassroots organization for community development. Investing more than \$30 million in housing and site improvements since 1986, CHLI has built nearly 200 affordable housing units in the North Camden neighborhood. We lead the community charge for neighborhood plan development and have established countless blight fighting initiatives. Our team is largely comprised of Camden residents. CLHI Executive Director Brandi Johnson oversees an annual operating budget of \$1.4 million and will act as project director. She will oversee day-to-day project operations and will be responsible for contract procurement, financial management and oversight.

iii. Acquiring Additional Resources: CLHI will procure a QEP through a competitive Request for Proposals/Qualifications process that will assist with the programmatic management and environmental engineering tasks for the grant. The QEP will in turn prepare an Invitation for Bid to procure a remediation contractor to perform the cleanup effort. Both solicitations will follow competitive procurement requirements in accordance with Federal and State contracting law.

b. Past Performance and Accomplishments

ii. Not Received an EPA Brownfields Grant but has Received Non-Federal Assistance Agreements:

(1) Purpose and Accomplishments: Camden Lutheran Housing has not been the recipient of Federal funds but has received major funding from the State of New Jersey Department of Economic Development (NJEDA) and the Department of Community Affairs (DCA) that require similar grant management and financial reporting. CHLI has also been a subrecipient for HUD Neighborhood Stabilization funds awarded to the City. CHLI received State DCA Neighborhood Revitalization Tax Credit (NRTC) grant funds of \$850,000 in 2021 and \$684,000 in 2022. These competitive funds are awarded to neighborhood-based non-profit organizations that have prepared, submitted and received approval from DCA and used for CHLI's affordable housing and neighborhood improvement programs. Since 2006, CHLI has received 20 NRTC awards totaling more than \$10M. These funding sources have contributed to CLHI's affordable housing accomplishments: leveraging more than \$30 million in housing and site improvements investments since 1986 to build nearly 200 affordable housing units in the North Camden neighborhood. We pride ourselves on building properties that residents are proud to call "home."

CHLI is also the recipient of multiple NJEDA Hazardous Discharge Site Remediation Fund grants. These grants have allowed CLHI to accomplish the full assessment of the 0.62-acre targeted site.

(2) Compliance with Grant Requirements: CHLI has an excellent, established track record for full compliance with all terms and conditions for the public funding we have received, evidenced by the multiple NRTC awards. We pay strict attention to the schedule, meeting project goals and outcomes, financial management and reporting requirements. CHLI is aware of the programmatic requirements involved in successfully managing an EPA grant and will dedicate the resources required for a successful outcome.



**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc. – Camden, New Jersey**

Front / Elm Streets Site
Threshold Documentation

**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc.— Camden, NJ
Threshold Criteria**

THRESHOLD CRITERIA

1. Applicant Eligibility:

- a. Camden Lutheran Housing, Inc. (CLHI) is a Not for Profit 501 (c) 3 organization. Documentation of its non-profit status is included as part of **Attachment 1**.
- b. CLHI is NOT a 501(C) 4. CLHI does not lobby the federal government.

2. Previously Awarded Cleanup Grants:

No EPA Brownfields Cleanup Grant funds have previously been expended on the Front/Elm Streets site.

3. Expenditure of Existing Multipurpose Grant Funds

CHLI does not have any open Multipurpose Grants.

4. Site Ownership Information:

CLHI is the current owner of the Front / Elm Streets site.

5. Basic site information:

- a) Front / Elm Streets Site (aka Former West Jersey Paper Manufacturing Site)
- b) NE Elm and Front Streets, Camden, NJ 08102

6. Status and History of Contamination at the Site:

- a) Type of Contamination: The site is contaminated by hazardous substances.
- b) Operational History/Current Uses: The Front/ Elm Streets Site was first developed circa 1850 as the West Jersey Paper Manufacturing Company, who owned/operated this site until 1967. Latex Fiber Industries, Inc. operated the site from 1967 to 1974. Both companies were engaged in paper milling and pulp operations. The entire area of the site has been subject to industrial operations including the use and storage of #6 fuel oil and the storage of other oils and chemicals. In 1974, the City demolished the buildings, and, in 1976, foreclosed on the property. The site has been an unused, vacant lot since the 1974 demolition, almost 50 years ago.
- c) Environmental Concerns. Results from preliminary assessment and remediation activities conducted by the New Jersey Department of Environmental Protection (NJDEP) between 1988 and 1997, indicate the presence of contaminants in the soil, including lead, cadmium, zinc, arsenic, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs), at concentrations above applicable state remediation standards. Recent site investigations undertaken by CLHI found the site contains large amounts of fill and buried debris that is also contaminated

**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc.— Camden, NJ
Threshold Criteria**

predominantly by PAHs and metals at concentrations above state remediation standards.

- d) Causation, Nature, and Extent of Contamination. Site contamination is believe to have originated with over a hundred year history of paper manufacturing operations in both the soil and the buried building materials that were left on site after the demolition of the manufacturing facility in 1974. Contaminated debris extends to a depth of 5 feet below grade and hot spot impacted soils are present to a maximum depth of 12 feet below grade.

7. Brownfields Site Definition:

The Front / Elm Streets site is:

- a) Not listed or proposed for listing on the NPL;
- b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- c) Not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

The Front / Elm Streets site has undergone significant site characterization. A Remedial Investigation has been conducted, the as of the date of grant proposal submission, the final report had not be issued.

Prior assessment efforts completed at the site include:

- 7/6/1988. Environmental Assessment. Lippincott Engineering Associates
- 8/27/1991. UST Removal Project. Lippincott Engineering Associates
- 5/19/1994. Closeout Report. NJDEP
- 6/15/1995. Pre-Remedial Investigation Report. NJDEP
- 11/13/2019. Preliminary Assessment Report. BRS, Inc.
- 12/2/2020. Site Investigation. BRS, Inc.

9. Site Characterization

- a) Not applicable, CLHI is not a State or Tribal Environmental Authority
- b) Not applicable. The State of New Jersey no longer has a VCP.
- c) Please see **Attachment 2** for the letter from the New Jersey Department of Environmental Protection, describing the LSRP program that replaced the VCP and certifying that there is a sufficient level of site characterization for remediation to begin regarding the site’s enrollment in the State Voluntary Remediation Program.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Front / Elm Streets site.

**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc.— Camden, NJ
Threshold Criteria**

11. Sites Requiring a Property-Specific Determination

A property-specific determination is not believed to be required for the Front / Elm Streets site.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substances Sites

i. EXEMPTIONS TO CERCLA LIABILITY – Not Applicable

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY - Not applicable

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

Non-Publicly Owned Sites Acquired Prior to January 11, 2002

- a) Property Acquisition: The City of Camden foreclosed on the site in 1976. The City later transferred the property to CLHI in order to effectuate the sites redevelopment.
- b) Date of Acquisition: The site was transferred by the City to CLHI on January 31, 1989.
- c) Environmental due diligence: CLHI had an environmental assessment performed at the site on July 6, 1988, prior to acquisition. This is customary at the time of acquisition.
- d) Timing of Disposal of Hazardous Substances: Disposal of all hazardous substances at the site occurred prior to CLHI's acquisition of the property.
- e) CLHI has not caused or contributed to any release of hazardous substances at the site.
- f) CLHI has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- g) Reasonable Steps:
 - i. Stop Continuing Releases: CLHI has taken steps to stop continuing releases. We worked with NJDEP to allow them to enter the site and conduct various removal and assessment activities to include the removal of USTs at the site.
 - ii. Prevent any threatened future release: We have allowed for any permitted uses and/or users of the site since our acquisition. We have worked with state authorities to obtain grant funding to continue the site characterization efforts for the site.
 - iii. Prevent or Limit Exposure: We have left the site unused/vacant and have made efforts to not disturb the vegetative cover.

**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc.— Camden, NJ
Threshold Criteria**

- b. Property Ownership Eligibility – Petroleum Sites:** Not applicable, the site is contaminated by Hazardous Substances.

13. Cleanup Authority and Oversight Structure:

- a.** The State of New Jersey has replaced the VCP with an alternate program, whereby Licensed Site Remediation Professionals (LSRPs) manage the assessment and cleanup process and are responsible for ensuring that all requirements are followed; with NJDEP auditing the results. CLHI, in compliance with all local, State, and Federal procurement requirements, including the competitive procurement provisions of 2 CFR §§ 200.317 through 200.327, issued a Request for Proposals to retain an LSRP for the site several years ago. The LSRP has overseen the PA, SI, and RI assessment efforts that have been completed.
- b.** It is not anticipated that access to neighboring properties will be required as site contamination has been fully delineated. However, if it is, CLHI will work to describe the issue to surrounding property owners and tenants, and will schedule the work in a way to minimize disruptions.

14. Community Notification documents:

- a.** Analysis of Brownfield Cleanup Alternatives (ABCA). An ABCA was prepared for the cleanup activities. A Draft ABCA was provided for public review and comment. The ABCA information was presented to a public meeting as well.
- b.** Community Notification: Prior to holding a public meeting, an ad in both ENGLISH and SPANISH was run in The Courier Post newspaper and on-line newspaper on 10/27/23. A local on-line news presence, TAPinto CAMDEN also posted the notice.
- c.** Public Meeting: A public meeting was held on October 30th via zoom. Public comments and responses to the comments are included in the meeting minutes.
- d.** Community Notification Documents: The ABCA can be found in **Attachment 3**. See **Attachment 4**, proof of Community Notification Ad. See **Attachment 5** for the sign in sheet and meeting notes from the public meeting held on October 30th.

15. Contractors and Named Subrecipients

- a. Contractors:** CLHI has not procured any contractors at this time which would be compensated with EPA funds made available under this RFA. Upon notification of award, procurement for EPA funded efforts will be conducted.
- b. Subrecipients:** CLHI does not intend to utilize subrecipients for implementation of the proposed EPA funded project.



**US EPA FY24 Brownfield Cleanup Grant
Camden Lutheran Housing, Inc. – Camden, New Jersey**

**Attachment 2
State Letter**



State of New Jersey

PHILIP D. MURPHY
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
CONTAMINATED SITE REMEDIATION AND REDEVELOPMENT
OFFICE OF BROWNFIELD AND COMMUNITY REVITALIZATION

SHAWN M. LATOURETTE
Commissioner

TAHESHA L. WAY
Lt. Governor

Mail Code 401-05K
P.O. Box 420
401 E. State Street
Trenton, New Jersey 08625

November 6, 2023

Michael S. Regan, Administrator
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

**RE: Camden Lutheran Housing, Inc. Camden New Jersey
USEPA 2024 Brownfields Cleanup Grant for Front & Elm Street**

Dear Administrator Regan:

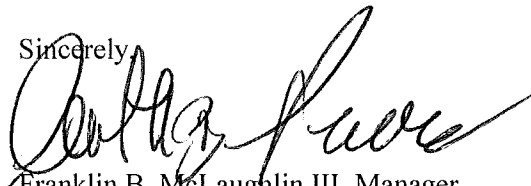
This letter of support acknowledges the New Jersey Department of Environmental Protection's endorsement of the Camden Lutheran Housing, Inc's (CLHI) application to the United States Environmental Protection Agency (USEPA) for a Brownfields Cleanup Grant for Front and Elm Street to remediate environmental contaminants associated with discharges of hazardous substances. If approved, the US EPA cleanup grant will provide up to \$2M dollars.

As per the FY24 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS, please note that the State of New Jersey no longer has a Voluntary Cleanup Program. Rather, the enactment of the Site Remediation Reform Act (SRRA) in 2009 established the Licensed Site Remediation Professional (LSRP) program and fundamentally changed the process for how sites are remediated in the state of New Jersey. As such, LSRPs "step into the shoes" of the New Jersey Department of Environmental Protection (NJDEP) to oversee the remediation of contaminated sites. SRRA requires that cleanups must be conducted under the direction of an LSRP, who has responsibility for oversight of the environmental investigation and remediation. The LSRP is required to comply with all remediation statutes and rules and consider NJDEP guidance when making remediation decisions. The NJDEP monitors the remediation progress and the actions of LSRPs.

The site does have a LSRP of Record who has served as the Environmental Professional and can certify that a sufficient level of site characterization has been completed and the LSRP is in the process of preparing the remedial remedy to clean up the site. The site should be ready to proceed to remediation by June 15, 2024.

Please accept this letter of support for the CLHI Cleanup Grant application. Please do not hesitate to contact me if I may be of further assistance. I may be telephoned at (609) 633-8227, or, e-mailed at frank.mclaughlin@dep.nj.gov

Sincerely



Franklin B. McLaughlin III, Manager
Office of Brownfield & Community Revitalization

Cc;/
Anthony Findley, NJ DEP
Brandi Johnson and Greg Allen, PhD, CLHI
Kathleen Nolan, BRS, Inc.