



EcolSciences, Inc.

Environmental Management & Regulatory Compliance

July 2, 2024

WRV Nurseries, LLC
100 Passaic Avenue, Suite 240
Fairfield, New Jersey 07004

Re: Remedial Approach for Residential and Commercial Parcels
Block 106, Lot 1 and Block 102, Lots 5 and 6
Plainsboro Township, New Jersey

To Whom it May Concern:

It is our understanding that the Township of Plainsboro Department of Planning and Zoning has requested a summary of the environmental issues and proposed methods of remediation determined by the Licensed Site Remediation Professional (LSRP) at the above- referenced property. This letter is intended to address the Plainsboro Township Planning Board staff's environmental comments.

Based on the investigations conducted to date at the property, arsenic and dieldrin related to historic pesticide applications have been identified at concentrations exceeding NJDEP Residential Direct Contact Soil Remediation Standards (RDCSRS). The impacts are generally limited to the upper twelve to 18 inches of the soil profile, with certain areas of impacts up to two feet deep, which is common for farmland, although surficial soils in portions of the Site comply with the SRS. It is our understanding that site redevelopment will include a combination of for-sale townhouses, multi-family rental units, and commercial uses. The remedial approach for each of these areas is outlined below. The remediation is being conducted under the oversight of the undersigned LSRP.

1. For-Sale Townhouses – The proposed remedial approach in For-Sale Townhouse portions of the property will be to excavate all RDCSRS exceedances in their entirety in accordance with all NJDEP regulations, including post-excavation soil sampling to document removal. The excavated soils will be consolidated into existing impacted areas located within the proposed rental residential and commercial use areas as discussed below, as well as in an area containing two existing berms in the westernmost portion of the parcel.
2. Rental Multi-Family Housing – The historic pesticide exceedances in these areas of the Site will remain in place and be capped with the proposed development, including building slabs, asphalt, concrete, paving stones, and a certified clean soil cap with a demarcating liner in green areas, in accordance with the NJDEP's Presumptive Remedies. The excavated soils from the for-sale residential areas may also be

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consolidated in the rental areas below the cap subject to final site grades and NJDEP protocols under the oversight of EcolSciences' LSRP. When capping is complete, a Deed Notice will be filed and a Remedial Action Permit (RAP) will be obtained from the NJDEP. The property owner will remain responsible for cap maintenance, financial assurance, and submitting Biennial Certifications to NJDEP every two years under the oversight of a LSRP.

3. Commercial Uses - These areas will be addressed in the same manner as the rental residential areas discussed above. The historic pesticide exceedances in these areas of the Site and excavated soil from the for-sale residential areas to be consolidated and capped in these areas pursuant to NJDEP protocols and Site grades will be addressed, a Deed Notice will be filed, and a RAP will be obtained from the NJDEP. As above, the property owner will remain responsible for cap maintenance, financial assurance, and submitting Biennial Certifications to NJDEP every two years under the oversight of a LSRP.

During all earthwork activities involving impacted soils (which will all remain onsite), including excavation, consolidation, capping, etc., environmental oversight will be conducted by trained personnel to ensure that conditions remain protective of human health and the environment and the soil movement activities are properly tracked to ensure compliance with NJDEP protocols.

If you have any questions, please feel free to call me.

Very truly yours,

EcolSciences, Inc.

A handwritten signature in black ink, appearing to read "Peter A. Hansen", with a long horizontal line extending to the right.

Peter A. Hansen, LSRP, LEP
Principal