



October 25, 2013

The ELM Group
Attention: Mark D. Fisher, CHMM, Managing Partner
345 Wall Street
Research Park
Princeton, NJ 08540-1512

Re: Italian American Sportsman's Club - RIRA/RAW
2275 Kuser Road (Block and Lot Map 231, Section 2575, Lot 47.01)
Hamilton Township, NJ
NJDEP Program Interest No. 552707

The Delaware Riverkeeper Network (DRN) requests the Italian American Sportsman's Club to have The ELM Group or another LSRP review the recommendations made by Excel Environmental and generate a revised RIRA/RAW and submit same to Hamilton Township and NJDEP for their review and approval.

DRN has reviewed the May 24, 2013 Remedial Investigation Report Addendum/Remedial Action Work Plan (RIRA/RAW) for the Italian American Sportsman's Club (IASC) and has many significant concerns focusing on the characterization and proposed clean-up of this site. Further, DRN has retained Excel Environmental Resources, Inc. (Excel) and its LSRP to conduct a full and thorough evaluation of The ELM Groups' RIRA/RAW. A copy of Excel's evaluation is attached. The Delaware Riverkeeper Network and Excel have addressed the Hamilton Township Council and they are fully aware of our findings.

If not thoroughly remediated, contaminated soils will remain on site and present a clear and present threat to the environment, the current and future residents of Hamilton Township and the communities that live downstream along the Crosswicks Creek and the Delaware River. 17 million people draw their drinking water from the Delaware River. Also, Gropps Lake is located only ¼-mile downstream from the IASC and is a popular fishing spot for Hamilton Township residents and other fisherman, young and old. It appears on 7 New Jersey fishing websites and boasts to be a great destination for bass and pickerel. If contaminated soils are left at the IASC, they may likely, during construction and over time, find their way into Gropps Lake and the food chain.

An insufficient and partial clean-up of this site is not in the best interest of the Italian American Sportsman's Club or the developer. There are going to be 52 homes built on this site with children playing in the back yards, foundations dug, and family garden and pools being installed. The extent of contamination that will not be addressed in the ELM Group's clean-up has been well documented in the Township record and the

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
drm@delawareriverkeeper.org
www.delawareriverkeeper.org

media. Area residents that will be forced to continue to live and raise families adjacent to or near this contaminated site will continue to voice their concerns long into the future.

Although Hamilton Township has several applicable Land Use regulations regarding soil sampling that are intended to protect Hamilton's residents and environment, it is unclear why the Township did not completely enforce its regulations during the development application process. In addition, it is unclear as to why the contamination wasn't reported by the Township or LSRP of record, to the NJ DEP until approximately nine months after it was confirmed despite NJ DEP code that requires immediate notification.

The lack of a comprehensive assessment and remediation plan at the Italian American Sportsman's Club is similar to the Lexington Manor development in Liberty Township, Ohio where in 2000 a developer bought a 26-acre farm that had been a skeet-shooting range in the 1960s. The tainted soil was not cleaned up appropriately and it wasn't until 2002 that the residents discovered high levels of lead in their yard. Litigation followed and now EPA is supervising the clean-up and several families have moved out.

DRN urges the IASC to have The ELM Group or another LSRP review the recommendations made by Excel and generate a revised RIRA/RAW and submit same to Hamilton Township and NJDEP for their review and approval.

Regards,



Fred Stine
Citizen Action Coordinator

Cc:

Mr. Chet Jacobi, President, Italian American Sportsman's Club (w/encl.)
Mayor Kelly Yaede, Hamilton Township (w/encl.)
Council President Edward Gore (w/encl.)
Council Vice President David Kenny (w/encl.)
Councilman Kevin Meara (w/encl.)
Councilman Dennis Pone (w/encl.)
Councilwoman Ileana Schirmer (w/encl.)
John Ricci, Business Administrator (w/encl.)
Richard Williams, PE, PP, CME Director, Dept of CP&C (w/encl.)
Michael Guhanick, Land Use Coordinator (w/encl.)
Mr. Lester Finch, Chair, Hamilton Township Environmental Commission (w/encl.)
Michele Russo, Secretary, Hamilton Township Environmental Commission (w/encl.)
Mr. Robert Martin, Commissioner, NJDEP (w/encl.)
Mark Pederson, Assistant Commissioner, Site Remediation (w/encl.)
Kevin Kratina, NJDEP Enforcement and Information Support (w/encl.)
Cindy Randazzo, Director, NJDEP Office of Local Government Assistance (w/encl.)
David Haymes, NJDEP SRRA, Rules and Statues (w/encl.)
Kevin Schick, NJDEP, Environmental, Evaluation and Risk Assessment (w/encl.)
Craig Wilkinson, NJDEP, Site Remediation Program (w/encl.)
Judith Enck, USEPA Region 2, Administrator (w/encl.)
Walter Mugdan, USEPA Region 2, Director, Emergency and Remedial Response Division (w/encl.)

Lahbib Chibani, PhD, PE, President, Sadat Associates, Inc. (w/encl.)

Robert Avolio, Esq. (w/encl.)

Dino Spadaccini, Esq. (w/encl.)

Tom Troy, Sharbell Development Company (w/encl.)

Attachments: Excel Environmental Resources, Inc. Comments to April 24, 2013 ELM RIRA/RAW