Material Handling Plan (updated October 2021)

All soil and fill recyclable materials proposed for P Park NJ will use the following acceptance and testing protocols:

1. **Compliance with NJDEP A-901 License**: Please note that PPark NJ, LLC has a valid NJDEP A-901 License. Effective January 21, 2020, the NJDEP expanded its A-901 licensing law in an effort to rid the industry from organized crime. Effective April 20, 2020 the NJDEP requires an A-901 license for businesses that collect, transport, process, broker, store, purchase, sell or dispose of "soil and fill recyclable material."

   NJDEP defines "soil and fill recyclable materials" to include, but are not limited to: broken or crushed brick, block, concrete, or other similar manufactured materials; soil or soil that may contain aggregate substitute or other debris or material, generated from land clearing, excavation, demolition, or redevelopment activities that would otherwise be managed as solid waste, and that may be returned to the economic mainstream in the form of raw materials for further processing or for use as fill material.

2. **Certification and Approval:** The *P Park NJ Fill Acceptance Certification and Approval* form will be completed and submitted with analytical results via e-mail to Jessica Russomanno at JRussomanno@PParkNJ.com. Once material from a specific source is approved, subsequent submissions for additional materials from these sources do not need to complete additional applications. If additional volumes are requested after the application was submitted, PPark will discuss the additional laboratory requirements as needed to approve additional material.

3. **Analytical Testing/Data:** The analytical characterization of soil and fill recyclable materials will be completed in accord with all relevant New Jersey Department of Environmental Protection (NJDEP) regulations and guidance, as outlined in Table 1, *Regulatory and Reference Documents,* (see attached). Clean soil and fill is defined as material that is not a solid waste and does not contain contaminants above the NJDEP Residential Soil Remediation Standards for the Ingestion-Dermal and/or Inhalation Exposure Pathways. Material shall be analyzed for and in accord with the procedures outlined in Table 2, *General Fill Material Chemical Criteria Testing,* (see attached).

4. **Geotechnical Evaluation:** PPark is looking for suitable material for use as backfill as part of the quarry reclamation process. The table below describes the basic parameters for suitable material and testing required to determine if the material is within scope (reflected in a quotation for acceptance). All clients are encouraged to determine if the soil and fill recyclable material meets the requirements listed below in Table 2, but are not required to sample. PPark will conduct QAQC sampling for materials suspected of exceeding the required parameters (at the cost of PPark).

5. **Scaling:** All soil and fill recyclable materials entering the facility must be weighed on the certified scales on-site.

6. **Weigh Tickets:** All weigh tickets/Bills of Lading will be collected, assembled, and will contain, at a minimum of:
   a. Total Weight, Tare Weight, Net Weight
   b. Type of Material (i.e., common fill or soil, rock, soil mixed with concrete, brick and block)
   c. Source of Material (Name and Address)
   d. The PPark NJ Project Number issued upon acceptance and review of a completed application

7. **Tonnages:** Totals of tonnages of all imported materials from each source shall be tabled and logged to establish quantities delivered.

8. **Written Approval:** Written or email approval for fill material use must be received from PPark before any material can be delivered to the facility.

9. **QA/QC Testing:** PPark will be performing QA/QC sampling in accordance with PPark NJ Testing Protocols. The Material Owner will be notified should results exceed the facility acceptance criteria, i.e. NJRDCSRS.

TABLE 1
REGULATORY AND REFERENCE DOCUMENTS

	DOCUMENT TITLE	REFERENCE	MAIN ISSUE ADDRESSED
1	TECHNICAL REQUIREMENTS FOR SITE REMEDIATION Statutory authority N.J.S.A. 13:1D et seq., 13:1E et seq., 13:1K-6 et seq., 58:10-23.11a et seq., 58:10A-1 et seq., 58:10A-21 et seq., and 58:10B-1 et seq. Date last amended August 6, 2018	N.J.A.C. 7:26E For the regulatory history and effective dates see the Administrative Code Rule expiration date March 13, 2026	Required certification and documentation to comply with the technical requirements. Work, quality assurance, and sampling plan requirements
2	Technical Requirements for Areas of Concern (AOC)	N.J.A.C.7:26-E3.9(a-f)	Definition of Areas of Concern, including: • Materials emanating from process areas with bulk storage tanks and appurtenances • Storage and staging areas • Surface impoundments • Drainage systems • Discharge and waste disposal systems • Other process areas characterized as areas of concern.
3	Solid Waste Regulations	N.J.A.C. 7:26 Subchapter 2A.	Requirements for above barrier backfill for sanitary landfills. Closure and certifications.
4	Analytical Sampling and Testing	2005 NJDEP Field Sampling Procedures Manual	Sampling collection, preservation, and holding times for soils subjected to analytical tests.
5	May 17, 2021 Remediation Standards (NJAC 7:26D)	N.J.A.C 7:26 D Appendix 1 – Soil Remediation Standard Tables	Risk assessment to determine acceptable soil screening levels (Compared against Ingestion-Dermal and Inhalation standards).
7	Class II-A Ground Water Quality Standards	N.J.A.C. 7:26 D	Comparison of Synthetic Precipitation Leachate Procedure (SPLP) to standards
8	Surface Water Quality Standards	N.J.A.C. 7:26D	Comparison of SPLP to standards
9	Guidance for Characterization of Concrete and Clean Material Certification for Recycling	N.J.A.C. 7:26A *et seq.*; or 7:26-1.7(g),	Characterization of on-site concrete and potential import of clean concrete from demolition projects

(updated 10/21/21)

TABLE 2
GENERAL FILL MATERIAL CHEMICAL CRITERIA TESTING

Completed by material owner and submitted with *Soil and Fill Recyclable Materials Certification and Approval* Application

P PARK ANALYTICAL REQUIREMENTS (10/2021)

Analyses	**Method**	**Frequency**
Volatile Organics (VOCs)	NJDEP/TCL List EPA SW846-8260B	One discrete grab sample for each proposed 1,000 (contiguous) cubic yards (using encore sampler)
Semi-Volatile Organics (SVOCs)	NJDEP/TCL List EPA SW846-8270C	One 5-point composite sample for each proposed 1,000 (contiguous) cubic yards
Pesticides	NJDEP/TCL List EPA SW846-8081B	
Polychlorinated Biphenyls (PCBs)	EPA SW846-8082A	
Metals, Target Analyte List ○ Chromium, Hexavalent ○ Cyanide, Total ○ Mercury	EPA SW846-6010B ○ EPA SW846-7196A ○ EPA SW846-9013A/9010C ○ EPA SW846-7471	
Extractable Petroleum Hydrocarbons - NJDEP EPH (Non-Fractionated)	NJDEP EPH Rev 3.0	
If Requested by PPark	**Based on site history or elevated analytical results**	
Herbicides, Target List	EPA SW846-8151B (Only required if site history indicates an issue)	One 5-point composite sample for each proposed 1,000 (contiguous) cubic yards
Dioxin	EPA 8290 (Only applicable if Site has a known history of industrial activities related to the production of chlorinated organic compounds)	One 5-point composite sample for each proposed 1,000 (contiguous) cubic yards
TCLP	TCLP Analysis may be required (High total results for hazardous compounds, PPark cannot accept hazardous material)	One 5-point composite sample for each proposed 1,000 (contiguous) cubic yards (except VOCs)

P. Park N.J. acceptance protocols require soil to be exempted as a solid waste by having contaminants below the May 2021 NJDEP soil cleanup standards, for either the Dermal-Ingestion standards and Inhalation Exposure pathways for all imported material. The current required lab analysis for applicable Target Analytes – TAL/TCL + 30 which is not uniformly capturing the full Target Analyte List, depending on the laboratory performing the analysis.

To ensure full compliance with P. Park N.J. acceptance protocols clients are advised to specifically request on the laboratory Chain of Custody Form : **NJR-Ingestion-Dermal/Inhalation-SRS and TAL/TCL + 30 plus**

TABLE 2
GENERAL FILL MATERIAL CHEMICAL CRITERIA TESTING

GEOTECHNICAL

PPark is requesting NJ Residential soils with certain moisture content and geotechnical properties. The following properties are required before surcharges may be incurred:

- Soil containing less than 20% fines (clays and silts passing a 200 sieve) Determine Silt/Clay Content using ASTM C117/C136 (Wet Sieve Analysis)
- Soils containing moisture content less than 7% (Determine Moisture Content using ASTM D2216)
- Organic content less than 2% organic material (as tested by Organic Content by Loss on Ignition – AASHTO T267 or ASTM D2974 (Standard Test Methods for Moisture, Ash, and Organic Matter of Peat and Other Organic Soils))

SAMPLING FREQUENCY

- One sample for every 1,000 cy of material.
- Each sample shall consist of the following: for all parameters except VOC's, one composite sample of five discrete grab samples (collected from separate locations over the entire representative volume of material).
- Each of the five grab sample locations shall be screened with a PID and a discreet encore sample is collected for VOCs at the location with the highest PID reading.
- In cases where no PID reading is observed, the sample point is randomly selected.

On-Site QA/QC Procedures

- QA/QC testing may be conducted to confirm analytical or geotechnical properties.

Highlights
VOCs:

- Acrolein and Acrylonitrile removed

SVOC:

- 2,3,7,8-Tetrachlorodibenzo-p-dioxin: If there is no known history of dioxin, this analyte is not required for analysis via method 8290.
- 2,4-Dinitrotoluene and 2,6-Dinitrotoluene were removed and replaced with 2,4-Dinitrotoluene/2,6-Dinitrotoluene (mixture), which is the sum of the two individual compounds.
- 1,2-Diphenylhydrazine and Benzidine were removed

EPH (non-fractionated): Required.

- PParkNJ will make the determination for acceptable levels based on site history using Category 1 or 2.

(Updated 10/2021)