



August 1, 2008

New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
Bureau of Northern Field Operations  
7 Ridgedale Avenue  
Cedar Knolls, NJ 07927

Attention: Deborah R. Cowell, Case Manager  
VIA: Regular Mail  
Subject: 1237 Ringwood Avenue  
Wanaque Borough  
Passaic County, New Jersey  
NJDEP Case # 98-12-14-1014-37

Dear Ms. Cowell:

During the last few months we exchanged a few phone calls about our site listed above. Pulte Communities of NJ, Limited Partnership purchased the site on December 21, 2000 to be used as a sales office for its Wanaque Reserve Community without knowing any environmental site regulatory history, until a potential site buyer started a due diligence period and found that the site is on the Known Contaminated Sites List (KCSL) and has a NJDEP case number 98-12-14-1014-37. Pursuant to our discussions, we hereby submit PA/SI report prepared by GTA consultants along with a Memorandum of Agreement (MOA) pursuant to our latest phone conversations. The site environmental compliance can be summarized in two categories; a) Previous correspondence with NJDEP with the previous site owner, and b) Findings by GTA in July 2008 report.

**a) Previous correspondence with NJDEP with the previous site owner**

The site environmental history dates back to a letter dated December 15, 1998 from NJDEP to Mr. Cheng, the previous site owner, and a Communications Center Notification Report notifying him of a suspected release of hazardous substances on the above referenced property to groundwater. Mr. Cheng failed to advise Pulte about the site environmental record before purchasing, and submitted a Phase I/Phase II report to NJDEP in August 1999, which was eventually deemed technically and administratively deficient by a letter from NJDEP dated 6/1/2001.

In order for the Pulte team to prepare a PA/SI report, NJDEP records were obtained to understand the site environmental regulatory history, and to proceed accordingly. Through the Open Public Record Act (OPRA), GTA was provided information by NJDEP about the Volatile

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Organic Compound (VOC) Trichloroethene (TCE) detected in groundwater above 1 microgram per liter; the current New Jersey Class II-A Groundwater Quality Criteria (GWIIA). The highest TCE concentration historically reported in groundwater on the subject site was 19 micrograms per liter.

b) Findings by GTA in July 2008 report

In order to address NJDEP concern as understood and described above, Pulte Homes retained GTA to prepare a Preliminary Assessment and Site Investigation (PA/SI) report including analytical results of soils and groundwater quality data. GTA findings are summarized below:

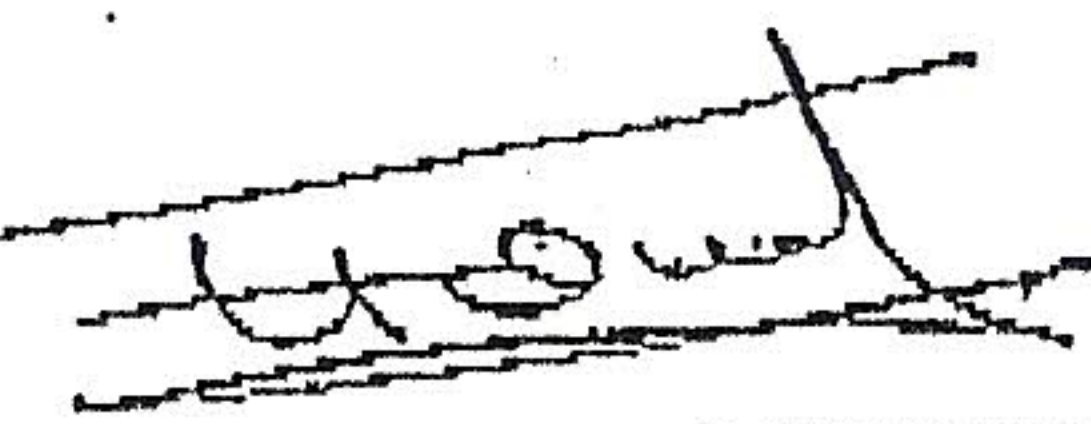
- Groundwater analytical results were below GWIIA criteria, except vinyl chloride, which was detected only in one well at a concentration of 1.1 microgram per liter, marginally above the GWIIA for vinyl chloride of 1 microgram per liter. NJDEP records identify sources of vinyl chloride and TCE upstream on the northwestern adjacent property at concentrations up to 8,400 microgram per liter.
- Soil analytical results were below applicable criteria.
- There is no source of contamination on site.

For the purpose of a complete site history, it is important to mention that the old Chinese restaurant was demolished in 2001 pursuant to NJDEP Permit No. 1613-01-0001.1, after disposal of all drums off site, and was replaced by the existing sales center. All demolition work was done according to applicable regulations.

Based on the findings listed above and the detailed information provided in the attached report, it is evident that the site is clean of any sources of contamination. No soil contamination was detected on site. The only contaminant detected on site was in the groundwater; vinyl chloride at 1.1 microgram per liter marginally above the GWIIA criterion of 1 microgram per liter. Site proximity to contaminated sites is evidently the cause of the groundwater contamination detected on site, due to the migration of a contaminant plume from upstream, where a concentration of 8,400 microgram per liter of Vinyl Chloride was found to the downstream where our site is located.

We request a No Further Action (NFA) Letter based on the findings listed above and the details provided in the attached report. Please let me know, if you have any questions or concerns, or if you like to discuss the matter further by phone at (732)803-5533 or by email at [ahmed.fouda@pulte.com](mailto:ahmed.fouda@pulte.com).

Best Regards,



Ahmed Fouda, PE, PP, PhD, CME  
Director of Planning

Cc: Lars White, Ed Israelow, Kathy Crow, Gary Rakow, Richard Lake