

Via: Electronic Mail

April 15, 2025

Borough of Keyport
Planning Board
P.O. Box 60
Keyport, NJ 07735
c/o: Ms. Denise Nellis, Board Secretary

Re: Response to Environmental Commission Letter dated January 31, 2025
Planning Board Application
KUPB 25-01 Avrohom Schlaff/AP Cass Street LLC
3 Cass Street
Keyport, New Jersey

Dear Ms. Nellis:

Delta Environmental Services, LLC (Delta), on behalf of AP Cass Street, LLC, has reviewed the Keyport Environmental Commission Letter dated January 31, 2025 associated with the above-referenced Planning Board Application for the property located at 3 Cass Street, Keyport, New Jersey (the "Site"). The letter includes concerns regarding the "Wellhead Protection and Groundwater Risk" as well as "Stormwater Management and Impervious Surface Impact." Please be aware that in response to actions required by the New Jersey Department of Environmental Protection (NJDEP) Bureau of Water Compliance and Enforcement, Stormwater Compliance Solutions, LLC (SCS), on behalf of Automoby, LLC (i.e., the current tenant of the Site), submitted an application for a New Jersey Pollutant Discharge Elimination System (NJPDES) Individual Stormwater Permit to the NJDEP on March 25, 2025. The application is currently under review. Once approved and permitted, the applicant will be bound to the terms of the regulated permit, including adherence to all Best Management Practices (BMPs) specified in the submitted Stormwater Pollution Prevention Plan (SPPP).

Automoby, LLC has tailored its operations in order to minimize the exposure of stormwater pollution at the Site. To this end, in accordance with the NJPDES Individual Stormwater Permit application, there is no (outdoor or indoor) vehicle washing conducted, and there is no mobile fueling to vehicles on the premises. The vehicles and facility are regularly inspected for potential leaks and pollutant sources, and spill response kits are readily available to use, if needed. All employees are trained on proper stormwater BMPs and the facility is maintained using good housekeeping practices. The requirements to obtain a stormwater discharge permit and achieve compliance under it mandate that routine inspections of the Site are conducted, and documents with all inspection records retained

on-site at all times. The permit application also includes a site survey and drainage maps detailing water flow direction and location of the one on-site stormwater outfall.

The permit application and associated plans were submitted to the NJDEP as a commitment by Automoby, LLC that the current tenant operations will adhere to State requirements with respect to stormwater management. The success of that plan includes comprehensive stormwater training to ensure that the BMPs for the facility are adhered to. Once again, the regular and routine inspections serve to identify and eliminate potential stormwater pollution issues in order to conform to the requirements of the NJPDES Individual Stormwater Permit.

The implementation of the permit requirements and continued commitment to good stormwater management practices will ensure the protection of nearby receptors as well as mitigate any potential impact to groundwater located within the Wellhead Protection Area. Automoby, LLC, in conjunction with the property owner, is not only seeking to achieve compliance under a regulated stormwater permit; it is striving to prevent and eliminate stormwater pollution risk from impacting public health and the environment, which includes the residents of Keyport Borough.

As outlined in the Application presented before the Planning Board, the use of the property involves parking/staging of vehicles on the premises, and packaging and shipping of automobile parts. It should be noted that the purpose of the foregoing report is only to respond to the concerns raised in the Keyport Environmental Commission Letter dated January 31, 2025.

Best Regards,

DELTA ENVIRONMENTAL SERVICES, LLC

A handwritten signature in black ink, appearing to read "Dan Lattanzi", with a stylized flourish at the end.

Daniel D. Lattanzi, LSRP
Vice President