Rodger A. Ferguson, Jr., LSRP

Senior Principal

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Mr. Rodger Ferguson has more than 40 years of experience in the environmental and analytical chemistry disciplines, of which the past 34 years have included general environmental and site remediation consulting.

Mr. Ferguson's project management areas have included Industrial Site Recovery Act (ISRA), underground storage tanks (USTs), hazardous waste management, soil and groundwater remediation, cost recovery, expert testimony, vapor intrusion mitigation, munitions and radiological remediation, landfill closure, Phase I/II/III environmental audits, hazardous waste disposal, NPDES permit compliance, Clean Air Act permitting, and Safe Drinking Water Act compliance.

His background as an analytical chemist, laboratory director, and project manager has permitted him to successfully manage large and complicated environmental site remediation projects and effectively communicate the potential risks to stakeholders and the public. Mr. Ferguson has testified as an expert in legal proceedings in a variety of formats and prepared expert reports to support litigation.

Education & Credentials

B.S., Chemistry (ACS Accredited), Ursinus College, Collegeville, Pennsylvania, 1983

NJDEP Permanent Licensed Site Remediation Professional (LSRP), No. 573794

NJDEP Underground Storage Tanks Subsurface Evaluator and Closure License No. 455706

Continuing Education

OSHA HAZWOPER 40-Hour Course Certified / Instructor
– Hazardous Waste Site Operations
– Emergency Response Specialist
– Emergency Response Incident Commander
– Hazardous Waste Site Supervisor

Professional Affiliations

American Chemical Society

Licensed Site Remediation Professional Association, 2009–Present
– Board of Trustees and President 2018
– Steering Committee
– Regulatory Outreach Committee
– Risk Management and Loss Prevention Committee

Relevant Experience

RISK COMMUNICATION

School Investigation and Remediation Communications, Trenton, New Jersey — As the lead project manager for the investigation and remediation of the Dr. Martin Luther King–Thomas Jefferson Schools in 2005–2010 on behalf of New Jersey School Development Authority, was personally responsible for all aspects of the project in a highly-politicized environment, including public outreach. Developed and presented materials for the public to communicate that the remediation did not cause any adverse impacts, as documented by the comprehensive perimeter air monitoring program, during the demolition of the partially constructed building and removal of contaminated recycled concrete aggregate.

SITE REMEDIATION

Redevelopment of Former Pesticide Manufacturing Facility, Jersey City, New Jersey — On behalf of the redeveloper, retained to review the previous work and develop an implementable strategy for the closure of the former pesticide manufacturing facility and the construction of a $75 million mixed-use development. Identified significant groundwater volatile organic compounds (VOCs)—including benzene, chlorobenzene, and chloroethane—as well as soil contamination resulting from industrial operations and regional historical fill material. Developed a remedial action work plan to expedite the

– SRRA 2.0 Co-Chair

NJDEP Stakeholder Workgroups, 2010–Present
– Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C
– Technical Requirements for Site Remediation, N.J.A.C. 7:26D
– Remediation Standards, N.J.A.C. 7:26D
– Ground Water Quality Standards, N.J.A.C. 7:9C
– Alternative and Clean Fill Guidance for SRP Sites, Workgroup Co-Chair
– Analytical Laboratory Data Generation, Assessment and Usability Technical Guidance

Fort Dix Base Restoration and Closure Restoration Advisory Board, Alternate Community Co-Chair, 2001–2005

NJDEP Watershed 19 Public Advisory Committee—Technical Advisory / TMDL Subcommittee Chair, 2002–2005

Pemberton Township Environmental Commission, Chair, 1988–1996

construction of the development, and supervised the construction of a steel sheet piling system into the competent clay layer to contain the suspected dense nonaqueous-phase liquids (DNAPL) and contaminated groundwater as part of the sitewide engineering control system that included a vapor barrier, passive sub-slab depressurization, and the concrete slab floor to prevent inhalation of the VOCs by the residents. As the LSRP for the site, directly managed and oversaw the preparation and submission of the area of concern (AOC)-specific remedial action report to the New Jersey Department of Environmental Protection (NJDEP).

Industrial Site Remedial Investigation and Remedial Action, Camden, New Jersey — Retained as the LSRP for the investigation and remediation of a confidential metals manufacturing facility with more than 100 contaminated AOCs. Led the review of the entire case file and prepared comprehensive report of 30 years of prior environmental activities and investigation of the soil, vapor, and groundwater to bring the site into compliance with NJDEP's requirements following the adoption of the Site Remediation Reform Act (SRRA). Developed a comprehensive conceptual site model to disprove an alleged connection of the groundwater impacts to a former municipal well field, a conclusion accepted by NJDEP. Documented the presence of several offsite sources of trichloroethene, 1,4-dioxane, and methyl *tert*-butyl ether and established site-specific groundwater remediation standards with NJDEP's concurrence. Active remediation of soil source areas has recently been completed, reducing the number of remaining contaminated AOCs, and a remedial action report and AOC-specific response action outcome have been drafted. Further evaluation of the groundwater for the purpose of establishing monitored natural attenuation as the proposed remedy is being completed and will be reported to NJDEP. With the pending sale of the property, provided guidance for the negotiation of a sales agreement and the ISRA remediation certification and remediation funding source (RFS). The total project expenditure since 2012 has been $3.2 million, and an RFS budget of $1.3 million for the remaining remediation has been established in 2025.

Remedial Investigation, Hillside, New Jersey — As the LSRP retained for the site, directed the investigation and remediation of an active beverage facility with DNAPL impacts from tetrachloroethene resulting from the prior manufacturing operations. While the ISRA case was closed by NJDEP with a no further action letter in 2012, evaluation of the institutional and engineering controls indicated that the vapor intrusion pathway had not been evaluated, leading to a reevaluation of the site and the discovery of 50,000 µg/L tetrachloroethene in the groundwater. An immediate environmental concern in the production wells and a vapor concern condition for the indoor air have been identified and are being remediated in accordance with NJDEP's regulations and guidance. Developed and implemented a $2.6 million remediation budget to facilitate an escrow account required by refinancing. The site characterization utilized an innovative geophysical technique based on resistivity to provide 3-dimensional visualization of potential DNAPL in the overburden and the bedrock using resistivity. An investigation of the overburden was completed and the investigation of the fractured bedrock in conjunction with an adjoining DNAPL site to delineate the extent of the plumes was conducted.

Landfill Remediation, Middlesex Borough, New Jersey — Served as the project manager and primary point of contact for the remediation of the former Middlesex Municipal Landfill. The landfill was utilized for municipal, industrial, and radiological waste from the nearby Middlesex Sampling Plant operations during the Manhattan Project. On behalf of the Borough, investigated the potential vapor intrusion impacts at an adjoining property with an operating childcare facility; when elevated levels of benzene and trichloroethylene were detected in the indoor air at the childcare facility, managed the public meetings and oversaw the design, specifications, bidding, and construction of a sub-slab

depressurization system. Worked on behalf of the Borough to assist in the recovery of costs from the industrial responsible party and the insurance carrier and obtained NJDEP funding for the continued remedial investigation for the landfill. Also coordinated the investigation with the U.S. Army Corps of Engineers and developed an innovative approach to mitigate the significant levels of landfill gas near the residential neighborhood where radiological impacts precluded mass excavation for a traditional 1,300 linear foot passive collection trench system. A pilot test was designed, and air permits obtained, to implement the landfill gas extraction using prepacked monitoring wells and a flare system, and established the design parameters for the construction of the final system.

Remediation Design and Construction, Trenton, New Jersey — Designed and implemented the preliminary assessment/remedial investigation and remedial action at the Dr. Martin Luther King, Jr.–Thomas Jefferson School site in Trenton, Mercer County, on behalf of the New Jersey Schools Development Authority. Supervised the development of the human health risk characterization, remedial action selection, remedial action work plans, perimeter air monitoring program, and bid specifications for the demolition of the partially constructed building and former school buildings, and the removal of 51,000 tons of impacted recycled concrete aggregate and an additional 35,000 tons of historical fill material. The remedial action report has been approved by NJDEP without comment, and a no further action determination was issued in December 2009. Total remedial cost was $14 million and the total project cost, including reconstruction, was $75 million.

Remedial Investigation, Newark, New Jersey — Retained as the LSRP of a site along the Passaic River in Newark on behalf of the property owner. Closed eight USTs; two were closed under the Cleanup Star program that was the pre-cursor to the LSRP program, and six were closed in 2013–2014 and reported to NJDEP. Obtained a $350,000 Hazardous Discharge Site Remediation Fund Innocent Purchaser Grant from NJDEP. In addition, represented the client with respect to EPA's initiative in response to a highly publicized series of articles about the so-called "forgotten smelters." A lead smelter formerly occupied part of the site, and, previously, the entire area was part of the zinc smelting works dating to the 1850s. Monitored EPA sampling activities for lead on and adjacent to the site and, at EPA's request, designed and constructed an engineering control on the adjoining property to ensure that the historical fill material underlying the former building foundations is not impacting the adjoining Newark Housing Authority property. The project includes the remediation of impacted groundwater from onsite UST-related discharges and comingled and offsite sources of trichloroethene and 1,4-dioxane. The remedial investigation utilized a membrane interface probe, a direct sensing technology, and discrete sampling data to produce 3-dimensional mapping of the subsurface and groundwater plumes. Currently developing a regional groundwater model with the two adjoining ISRA responsible parties to reclassify the impacted shallow groundwater as a non-potable use area. A sitewide remedy for the historical fill material and site improvements to include stormwater management necessary to implement the engineering controls are currently under development.

RENEWABLE ENERGY

Paper Mill to Solar Redevelopment, Milford, New Jersey — On behalf of a private solar redeveloper, was the primary project manager for design and construction of an 18 MW grid supply solar array on an abandoned paper mill. Although the remediation was being completed by multiple ISRA responsible parties, reviewed the key documents submitted by the respective LSRPs and suggested corrections, since implemented, to expedite the approval of the remedial action permit for soils by NJDEP. Provided testimony at local land use board hearings. To facilitate the redevelopment, submitted a remedial action work plan to inform NJDEP of the impending cap disruption and direct the

onsite contractors. Supervised the fieldwork during construction, including the closure of two previously unidentified USTs, and prepared a new deed notice and a modified remedial action permit for soil as part of the remedial action report showing the solar redevelopment.

Landfill to Solar Redevelopment, Southampton, New Jersey — Executed the due diligence documents for the foreclosure of a landfill proposed for the construction of two 5-MW community solar arrays. The orphan-site landfill was closed in the 1980s by NJDEP. Assisted in the negotiation of an administrative consent order with NJDEP wherein the redeveloper was only responsible for the landfill cap. Retained by redeveloper as the LSRP for the landfill cap, and NJDEP continued to be responsible for the active landfill gas system and groundwater monitoring. Provided testimony at local land use board hearings. Supervised the preparation of the landfill closure documents to facilitate the construction of the solar array, and staff supervised the field activities, including implantation of a perimeter air monitoring program to ensure the retirement community adjoining the landfill was not impacted by the construction. Following completion of construction, supervised the submission of a deed notice and remedial action permit for soil application as part of the landfill closure reporting documents.

Landfill to Solar Redevelopment, Chester, New Jersey — Implemented the All Appropriate Inquiry for the foreclosure on the Combe Fill South Superfund site where an 18 MW grid supply solar array was proposed. The orphan-site landfill was closed in the 1990s by NJDEP and the groundwater treatment system is being upgraded by EPA. Assisted in the negotiation of an administrative consent order with NJDEP that included a threatened and endangered species monitoring program for grassland birds, wherein the redeveloper was only responsible for the landfill cap, but where NJDEP continued to be responsible for the active landfill gas system and EPA is responsible for the groundwater monitoring and treatment. Provided testimony at local land use board hearings. Supervised the preparation of the landfill closure documents to facilitate the construction of the solar array, and staff supervised the field activities, including implantation of a perimeter air monitoring program. Following the recent completion of construction, the submission of a deed notice and remedial action permit for soil application as part of the landfill closure reporting documents are being completed.

Compost Facility to Solar Redevelopment, Belvidere, New Jersey — Directed the environmental investigation and remediation from the initial conception of the project through the recently completed construction of a 24 MW grid supplied solar array on a former industrial compost facility with a history of more than 90 solid waste violations from NJDEP. Performed all appropriate inquiry and developed the remedial investigation and remedial action work plan to facilitate the construction. Provided testimony at local land use board hearings. Negotiated the administrative consent order with NJDEP to close out the supervised construction on behalf of the redeveloper. The construction has recently been completed, and the final remediation action report is being prepared for submission to NJDEP.

RISK ASSESSMENT

PCB Risk Assessment, New Jersey — Retained on behalf of the redeveloper to evaluate the potential PCB human health risk at the at a former refining and industrial facility. The former industrial site is being redeveloped into a new multimillion square feet facility for use in the production of movies and videos. Following acquisition, the redeveloper's engineer and LSRP identified the presence of PCB remediation waste exceeding 1 mg/kg beneath the original engineering control constructed by the studio developer and the enhanced engineering control represented by the 10 to 12 ft of clean structural fill material added above the engineering control. Because an engineering control had

already been constructed, the risk assessment evaluated the potential for exposure under conservative cap failure/disruption scenarios of the cap only for construction workers, outdoor workers, and future potential utility workers, eliminating the need for a self-implemented low-occupancy remedy. Based on the calculations conducted in accordance with EPA requirements, all three scenarios yielded results showing no adverse carcinogenic or non-carcinogenic risks. EPA approval is pending.

PCB Remedial Investigation, Risk Assessment, and Remedial Action, New Jersey — On behalf of the redeveloper, a manufacturing facility was investigated following the demolition of the building and removal of USTs that were discovered within an enclosed vault buried beneath the former manufacturing building. The residual fuel oil within both USTs was contaminated with PCBs as was soil surrounding the USTs. The former building's walls and floors were documented to have been contaminated with PCBs prior its demolition. All soil grossly contaminated by PCBs and fuel oil was excavated and removed from the site. Additional investigations were performed to delineate the presence of soil contaminants associated with the historical manufacturing operations at the site, particularly PCBs, and, to a lesser extent, extractable petroleum hydrocarbons, PAHs, and some heavy metals. A site-specific risk assessment of the PCB impact was conducted in a manner consistent with EPA guidance to estimate the risk associated with potentially completed exposure pathways conservatively. This risk assessment satisfied the EPA requirements under TSCA so that PCB concentrations greater than the self-implemented low occupancy remedy remained onsite. The risk estimates were based on site-specific risk-based screening levels and take into consideration worst-case exposure scenarios and the default values specified by, and approved by, EPA.

HEALTH AND SAFETY

Landfill Redevelopment Safety, Jersey City, New Jersey — On behalf of a private redeveloper, developed the job hazard assessments and the site-specific health and safety plan (HASP), and served as the project safety and health officer for the remediation and redevelopment of the PJP Landfill Superfund site in Jersey City, Hudson County. The scope of work at the site includes the capping of the existing landfill, installation of a gas collection system, dynamic compaction of waste and imported fill materials, and the installation of controlled modulus columns to support the proposed 850,000 ft^2 warehouse. The HASP was utilized for all onsite work activities, by all contractors and subcontractors for the duration of the $12 million remediation project without a lost time accident in Level C personal protective equipment. Also developed the perimeter air monitoring program for the additional remediation activities related to the hexavalent chromium impacted soils and the relocation of the 24-in. natural gas pipeline and other construction activities.

EXPERT TESTIMONY

PCB Remediation, Newark, New Jersey — Retained by counsel to defend a large environmental and engineering firm accused of gross malpractice involving the remediation of PCBs. Very high levels of PCBs, 1,900 mg/kg, were identified historically, but the defendant firm's LSRP appeared to have deleted the historical PCB data in the remedial investigation report and remedial action work plan submitted to NJDEP. While concurring that the negligence claim was warranted, continued as the litigation support consultant and expert; prepared an expert rebuttal report after reviewing the investigation and remediation of the PCBs and VOCs to assist in the settlement of the claim where cost of the ongoing remediation to satisfy NJDEP's Spill Compensation and Control Act requirements and EPA's TSCA has exceeded $20 million. The matter is currently scheduled for trial in September

2025.

PCB Remediation, New Jersey — Retained by counsel representing the plaintiff in federal litigation related to the former use of PCBs at the plaintiff's small scientific products manufacturing business where the defendant previously manufactured wallpaper using PCB-containing adhesives. Although the plaintiff was known to have used, and still had inventory of PCBs, at the site, analysis of the PCB data and historical manufacturing process including written recommendations for adhesive formulations in the early 1960s, rebutted the defendant's expert report, and determined conclusively that the historical PCB contamination in the soil was the sole responsibility of the defendant. Also developed a defensible system for the allocation of costs between the plaintiff and defendant whereby the defendant accepted partial responsibility for the PCBs in the concrete floor of the building only. The matter recently settled very favorably for the plaintiff to include the costs for all remediation by the defendant.

Historical Fill Remediation, Roxbury, New Jersey — Retained as the expert for a confidential junkyard operator to rebut allegations that the defendant's junkyard operations had impacted the soil adjoining the site. Using data collected by the defendant's LSRP during the remediation of the junkyard, data collected by the plaintiff's LSRP, and readily available historical documentation, report and deposition testimony concluded that the nature of the contamination was historical fill material remnant of the Morris Canal and surface dumping of unknown origin, and that the plaintiff's expert had not established a nexus between the defendant's alleged operations and the offsite area in question. The matter has since been settled favorably for the defendant. Subsequently, retained as the LSRP for the remediation of the offsite area as the LSRP.

Cost Recovery Litigation, Jersey City, New Jersey — Retained by the State of New Jersey to provide an expert report and testimony in the cost recovery related to a former drum reconditioning facility. Report and deposition testimony rebutted the property owner's expert's report and conclusively documented that the property owner had not established the innocent purchaser defense at the time the property was purchased in 1987 because the actions taken by property owner, or more importantly the actions not taken when presented with credible evidence that the site was grossly contaminated, constituted a failure to have met the good and customary practice for an environmental evaluation of a former industrial property in Jersey City in 1987. Therefore, the innocent purchaser defense as defined by the New Jersey Spill Compensation and Control Act (the precursor to Comprehensive Environmental Response, Compensation and Liability Act of 1980 known as CERCLA or Superfund) was not established in this matter. The matter has settled favorably for the State as a result.

Alleged LSRP Malpractice, Howell, New Jersey — Retained by counsel for the insurance carrier in defense of an LSRP to review the case file and prepare an expert report on the alleged LSRP's collusion that resulted in both a civil suit and a complaint by the current property owner against the LSRP to the Site Remediation Professional Licensing Board (SRPLB). At issue was the presence of solid waste in the subsurface from the operations of the ISRA-applicable property owner that were not identified by the LSRP in his preliminary assessment. After reviewing the file, was able to demonstrate that there was no evidence of collusion, the current owner had not established the innocent purchaser defense under either EPA or NJDEP regulations, and that the current owner's tenant was conducting remediation without having retained an LSRP in violation of SRRA. The matter settled favorably without the preparation of a formal report or testimony and included the withdrawal of the complaint to the SRPLB.

Alleged LSRP Malpractice, Hillside, New Jersey — Retained by counsel for the insurance carrier to defend an LSRP who was also a member of the SRPLB. In this matter, opined that the plaintiff's expert inappropriately applied the current standard of care regarding the LSRP's retention of documents required by the SRRA and the SRPLB regulations to the requirements for the closure of a UST in 1991. The expert report also documented that the plaintiff's expert's discussion of the applicable damages was inappropriate because the responsible party would have incurred those costs regardless of the alleged document retention issue. The matter settled favorably.

Cost Recovery Litigation, Pennsauken, New Jersey — Prepared an expert report on behalf of counsel for the alleged third-party contribution of a confidential former industrial facility's municipal solid waste to the groundwater impacts at the Pennsauken landfill. The report focused on the lack of a nexus between the known operations of the facility and the groundwater contamination emanating from the landfill. The previous environmental investigations at the facility and the known handling of nonhazardous wastes were evaluated and used to document that the facility had complied with the applicable regulations and that its wastes had been transported to appropriately licensed facilities and that the testimony upon which the plaintiff relied had contradicted testimony given in the Tabernacle Drum Dump Superfund case. The matter was settled favorably.

Cost Recovery Litigation, Kearney, New Jersey — Prepared the expert report on behalf of counsel for a potentially responsible party in a case related to the former Syncon Resins Superfund site where NJDEP attempted to recover costs for its role in the remediation. The expert report focused on the analysis of the data collected by EPA during its investigation of the placement of dredge materials at a site, but where the primary remedial effort was for VOCs in the soil and groundwater resulting from the storage and handling of more than 12,000 drums. The expert report also included the refutation of NJDEP's claim for natural resource damages as it related to the dredge spoils. The case has been settled favorably.

Insurance Fraud, Cape May County, New Jersey — Subpoenaed by the Cape May County Prosecutor's office as a fact witness and later admitted as an expert while testifying in court. The matter was an alleged insurance fraud case where the defendant had claimed damages resulting from lead-based paint dust at a restaurant submitted to Mr. Ferguson's NJDEP certified laboratory. Mr. Ferguson's experience in lead based paint risk assessment was cited in the interpretation of the results. The case resulted in a guilty verdict.

COST ALLOCATION

Cost Allocation, Carlstadt, New Jersey — On behalf of a confidential member of the small party group in the Scientific Chemical Processing Superfund Site litigation, retained as an expert to review the remediation of the site by EPA and the proposed $10 million remediation of Operating Unit 3 for the treatment of 1,4-dioxane in the groundwater. Prepared a detailed report that documented the member's short-term transport tanker truckloads of spent solvents for recycling occurred in only one area of the site, while EPA's proposed remediation of 1,4-dioxane was focused on another area of the site where drums were stored subsequent to the member's short-termed operations. EPA's cost allocating expert accepted these findings and the small party group member has been excused from additional liability.

REGULATORY SUPPORT

NJDEP, Trenton, New Jersey — Key stakeholder in the revisions to the NJDEP's Technical

Requirements for Site Remediation (TRSR, N.J.A.C. 7:26E) that were necessary to implement the SRRA, which created the LSRP program. The final rule was adopted in November 2012.

NJDEP, Trenton, New Jersey — As the co-chair, played a key role in the development of NJDEP's Fill Guidance for SRP Sites, initially published in August 2011. Presented the Fill Guidance to the regulated community in training held at NJDEP on October 27, 2011, and at New Jersey Institute of Technology on November 16, 2011. The guidance has been revised periodically, most recently in August 2021; provided input.

NJDEP, Trenton, New Jersey — Key stakeholder in the development of the NJDEP's Analytical Laboratory Data Generation, Assessment and Usability Technical Guidance documents. The four guidance documents were adopted in April 2014.

NJDEP, Trenton, New Jersey — Represented the LSRPA as a stakeholder for revisions to NJDEP's Remediation Standards (N.J.A.C. 7:26D) and Ground Water Quality Standards (N.J.A.C. 7:9C).

NJDEP, Trenton, New Jersey — Served as the LSRPA co-chair of the stakeholder committee negotiating amendments to the SRRA that were adopted in August 2019.

NJDEP, Trenton, New Jersey — Active stakeholder on behalf of the League of Municipalities for the re-adoption of the NJDEP Administrative Requirements for the Remediation of Contaminated Sites (ARRCS, N.J.A.C. 7:26C) and the TRSR resulting from the SRRA amendments.

Publications

Lexis Nexis, Brownfields Law and Practice: The Cleanup and Redevelopment of Contaminated Land: Volume 2 – New Jersey.

NJDEP, Fill Material Guidance for SRP Sites, version 4.0, August 2021.

NJDEP, Analytical Laboratory Data Generation, Assessment and Usability Technical Guidance, version 1.0, April 2014.

NJDEP, Quality Assurance Project Plan Technical Guidance, version 1.0, April 2014.

NJDEP, Data of Known Quality Protocols Technical Guidance, version 1.0, April 2014.

NJDEP, Data Quality Assessment and Data Usability Evaluation Technical Guidance, version 1.0, April 2014.

Select Presentations

PCB remediation – What every LSRP needs to know. 2024. LSRPA Site Remediation Conference, New Brunswick, NJ. May.

LSRP professional judgment – Application and management. 2023. LSRPA Site Remediation Conference, New Brunswick, NJ. January.

PCB remediation – What every LSRP needs to know. 2021. LSRPA Site Remediation Conference, New Brunswick, NJ. November.

LSRP professional judgment – Application and management. 2021. LSRPA Site Remediation

Conference, New Brunswick, NJ. February.

PCB remediation – What every LSRP needs to know. 2020. LSRPA Site Remediation Conference, New Brunswick, NJ. June.

LSRP professional judgment – Application and management. 2019. LSRPA Site Remediation Conference, New Brunswick, NJ. January.