From: (b) (6) Privacy
To: Title VI Complaints
Subject: NJDEP federal financial assistance?
Date: Tuesday, May 19, 2015 11:23:27 AM

Who Whom It May Concern:

I am in need of clarification. The New Jersey Department of Environmental Protection (NJDEP) has given the New Jersey Schools Development Authority (SDA) conditional approval to begin construction of a high school in New Jersey. Although the SDA is a State agency, the NJDEP is responsible for approving the Environmental Assessment. We are concerned that he NJDEP has engaged in discriminatory practices. May we file a complaint against the NJDEP with the EPA?

Thank you.

From: (b) (6) Privacy, (b) (7)(C) Enforcement P[redacted]
To: Title VI Complaints
Subject: Trenton Central High School
Date: Tuesday, May 26, 2015 4:05:25 AM

(b) (6) Privacy, (b) (7)(C) Enforcement Privacy
[redacted]
Trenton, NJ 08609
(b) (6) Privacy, (b) (7)(C) Enforcement Pri[redacted]

May, 26, 2015

Dear, DEP,

On May 9, 2015, the New Jersey Department of Environmental Protection, (NJDEP) which receives federal monies, awarded the New Jersey Schools Development Authority (NJSDA) an authorization for the demolition of the Trenton Central High School in Trenton, New Jersey. Normally, for this size project, which sits on 38 acres and has a budget of $140,000,000.00, the state requires an extensive Environmental Impact Satement be performed.

To date, this study has not been done. Instead, the NJSDA has been been given the go-ahead by the NJDEP to demolish a building that previous studies show will adversely affect the surrounding environment.

Because the surrounding area is a minority and low income neighborhood, NJDEP has not required the project managers to perform the same do-diligence that would normally be done for a project of this magnitude in a weathy or predominantly white neighborhood.

This blatant racial and income discrimination is unfair to the neighbors that occupy the houses near the school and they are asking for help from the Federal Department of Environmental Protection in this matter. We would like the Environmental Protection Agency to halt the demolition of the building until a credible Environmental Impact Statement is researched and presented.

If you need any further information, please call me at any time.

Thank you in advance for your prompt attention to this matter.

Sincerely,

(b) (6) Privacy, (b) (7)(C) Enforce[redacted]

From: (b) (6) Privacy
To: Title VI Complaints
Subject: New Jersey Department of Environmental Protection vs Trenton Community
Date: Thursday, May 28, 2015 12:59:36 PM

Complaint: New Jersey Department of Environmental Protection (DEP)

Office of the Commissioner

401 E. State St.

7th Floor, East Wing

P.O. Box 402

Trenton, N.J. 08625-0402

vs Trenton Community

On February 10, 2014, the New Jersey Schools Development Authority (NJSDA), voted to allocate 130.5 million dollars to replace Trenton Central High School (TCHS).

On October 11, 2014, CB&I Government Solutions Inc. completed the "Structural Site Visit Assessment Report" for Trenton Central High School.

On October 14, 2014, the Trenton Board of Education vote unanimously to demolish the existing Trenton Central High School and construct a new building on the same footprint.

On or about April 15, 2015, a contractor hired by the New Jersey Schools Development Authority (SDA) began demolition and remediation work at the Trenton Central High School site. The contractor proceeded to engage in the removal of asbestos and demolition of TCHS without the advisement and completion of an Environmental Assessment or a more rigorous Environmental Impact Statement (EIS) as required by the State of New Jersey.

The contractor has been observed leaving windows and doors open during the remediation process as well as creating a hole above the "C wing" entrance, potentially introducing asbestos fibers into the air of the surrounding residents. In addition, on or about May 25, 2015, the contractor removed windows in the vocational wing of TCHS. The contractor failed to properly seal the building to prevent the release of contamination. On or about May 12, 2015 the State of Jersey posted a sign on the front gate of TCHS, noting "Notice of Environmental Investigation/Cleanup In Progress….".

Directly adjacent to the site are several neighborhoods, Saint Francis hospital, and student athletic fields that are in daily use during remediation and demolition.

According to the New Jersey Department of Education, the ethnic breakdown of students at Trenton Central High School is 49.7% Black and 47.6% Hispanic (2013-2014 School Year). According to the United States Census, the ethnic breakdown for the City of Trenton is 33.7% Hispanic and 52% Black.

The New Jersey Department of Environmental Protection (NJDEP) is a recipient of federal financial assistance and is charged with the responsibility of protecting the environment in the State of New Jersey. On May 8, 2015, the New Jersey Department of Environmental Protection provided the SDA conditional approval to commence demolition even though no Environmental Impact Statement (EIS) was completed.

The NJ DEP allowed the NJSDA to commence construction, without requiring the NJSDA to meet the following requirements recommended by the CB &I environmental assessment (including, but not limited to):

· An asbestos abatement design will be performed by a certified USEPA AHERA Asbestos Abatement Project Designer.

· Third-party asbestos abatement oversight will be performed and all analytical will be performed off-site by a licensed New Jersey Asbestos Laboratory.

· Removal of Universal Waste will be recycled by a licensed facility.

· Removal of any refrigerants will be removed and certified by a licensed individual.

· NJPDES permit for discharge of stormwater to surface groundwater.

· NJ Licensed Driller will be needed to obtain a NJDEP Well Abandonment Permit for a monitoring well located in Wing-F (former auto shop).

· Rodent Control Plan will be prepared and implemented by an individual licensed to provide a clearance certificate.

· NJDEP licensed laboratories will be needed for all soil/disposal analytical.

· NJDEP licensed transporter will be required.

· Licensed disposal landfill will be required.

CB & I's report indicated various degrees of contamination at the TCHS construction site. The New Jersey Department of Environmental Protection permitted the New Jersey Schools Development Authority to proceed with demolition of Trenton Central High School, without taking the necessary steps to protect the health and safety of the community. These actions by the DEP, will have an adverse impact on the environment, in violation of the Clean Air Act and Title VI of the Civil Rights Act of 1964, as amended.

From: (b) (6) Privacy
To: Title VI Complaints
Subject: Please accept the following complaint
Date: Tuesday, August 11, 2015 11:11:06 AM

Complainants:

(b) (6) Privacy, (b) (7)(C) Enforcement Privacy
[redacted]

(b) (6) Privacy, (b) (7)(C) Enforcement Pri
[redacted]

Neighbors of Trenton Central High School

Other complaints

Vs

New Jersey Department of Community Affairs

Office of the Commissioner
101 South Broad Street
PO Box 800
Trenton, NJ 08625-0800

New Jersey Department of Environmental Protection

Office of the Commissioner

401 E. State St.
7th Floor, East Wing
P.O. Box 402
Trenton, NJ 08625-0402

TCHS neighbors file discrimination complaint against DEP and DCA

On or about August 6, 2015, a contractor hired by the New Jersey Schools Development Authority (SDA) proceeded to demolish the roof and various other parts of Trenton Central High School. Remediation of Trenton Central High School began during April of 2015. However, a consultant hired by the New Jersey Schools Development Authority noted that remediation of TCHS will take approximately one year. On or about August 5, 2015, the SDA reported that demolition of TCHS will take place only in those sections of the building in which remediation is complete. However, a structural assessment reported completed by CB & I Government Solution, Inc. on September 11, 2014, noted that demolition in one area of the building will affect the structural integrity of other parts of the building. Therefore, demolishing TCHS in sections, without waiting for the completion of total remediation of Trenton Central High School, poses a threat to the health and safety of residents.

On or about August 7, 2015, the New Jersey Attorney General's Office and United States District Attorney was notified regarding wrongdoings and awarding of various contracts associated with Trenton Central High School. Concerns regarding a "conflict of interest" and other issues have been raised. For example, the SDA noted that the contractor that will perform the demolition will also perform the abatement. In addition, the contractor hired to do the Structural Assessment is the same contractor that completed the Environmental Assessment.

On or about May 8, 2015, an Environmental Assessment (EA) was completed for Trenton Central High School. The Environmental Assessment report was incomplete. The report failed to accurately assess the environmental situation at Trenton Central High School. As a result, contamination remains at Trenton Central High School, which has posed a threat to the health and safety of area residents and patients at nearby Saint Francis Hospital.

Trenton Central High School presently contains various holes in the roof and other openings in the building which has caused sickness to residents. The contractor hired by the New Jersey Schools Development Authority failed to properly seal TCHS in a manner to prevent residents from further exposure to contamination. The tools utilized to monitor the contamination at TCHS have been biased and defective.

On or about August 6, 2015, the New Jersey Department of Community Affairs and New Jersey Department to Environmental Protection granted various approvals which permitted demolition and remediation at Trenton Central High School. Demolition of Trenton Central High School has been permitted to continue, although a feasibility study in accordance with State law was not completed, prior to the closure of Trenton Central High School. Research has consistently shown that rehabilitation is less harmful than demolition.

The Trenton Board of Education voted to select design option #3 for the new Trenton Central High School. However, the Trenton School District permitted various District employees to participate in the planning of TCHS, without the guidance of a project manager independent of the SDA. Additionally, the New Jersey Schools Development Authority has failed to hire a Chief Executive Order with the expertise to manage school construction projects.

The lack of expertise during the planning of TCHS has contributed to the environmental problems at the construction site. The NJDEP and other government agencies failed to adhere to Executive Order #47 (1b), which mandates that the CEO have a background in school construction.

According to the United States Census, the racial breakdown of the City of Trenton is approximately 52% African American and 33% Hispanic. In addition, the neighborhood surrounding Trenton Central High School is composed of mostly African Americans and Hispanics residents.

The New Jersey Department of Environmental Protection and New Jersey Department of Community Affairs engaged in racial discrimination by jeopardizing the health and safety of residents near Trenton Central High School, in violation of the VI of the Civil Rights Act

of 1964, as amended.

From: [redacted]
To: Title VI Complaints
Subject: EPA complaint against NJ Department of Environmental Protection
Date: Thursday, October 22, 2015 9:16:14 AM

United States Environmental Protection Agency

Office of Civil Rights (1201A)
1200 Pennsylvania Ave NW
Washington, DC 20460

Community

Vs

New Jersey Department of Education

Trenton School District

New Jersey Department of Community Affairs

City of Trenton

In October of 2014, the Trenton Board of Education voted unanimously to demolish Trenton Central High School. On or about April 1, 2015, preconstruction activities began at Trenton Central High School. These preconstruction activities included, but not limited to: demolition, remediation and site investigation. The Trenton School District and Jersey Department of Education failed to adhere to State regulations regarding demolition and preconstruction activities. For example, preconstruction activities cannot begin until a School District has an approved Long-range facilities plan. Preconstruction activities began at TCHS although the LRFP was not approved until June 1, 2015 in violation of (NJAC 6A:26-3.9b.) The 2007 LRFP expired in 2012. In addition, the Trenton School District failed to close 400 Chamber St. pursuant to (NJAC 6A:26-7.5). The Trenton School District as the owner of 400 Chamber St, has refuse to hire a project manager with a background specifically in construction, environmental remediation, and architecture to oversee the activities of the contractor hired by the Jersey Schools Development Authority (SDA), in an unbiased manner.

On or about May 8, 2015, the New Jersey Department of Environmental Protection (DEP) provided conditional approval to commence demolition activities. The DEP noted that a licensed site remediation professional was not on site. The DEP also detected high-levels of contamination at this site. An Environmental Assessment report was competed for 400 Chambers St. However, the report was falsified.

Thus far, various wings have been demolished at Trenton Central High School. The “A” and “D” wings remain standing. The New Jersey Department of Community Affairs has issued demolition permits. However, the “A ”and “D” wings are also slated for demolition, although the remediation remains incomplete. The B, C, E, and F wings have already been demolished although remediation was not finished. Air monitors were installed at 400 Chambers Street. However, these air monitors were defective and manipulated by the

contractor to prevent an accurate reporting of air quality. The City of Trenton has “shut off water” at 400 Chambers St. which has allowed the demolition contractor to be eligible to apply for a demolition permit. The City of Trenton also “shut off” water although the Trenton School District, failed to officially close Trenton Central High School in accordance with State regulations.

On or about September 11, 2015, dust, asbestos and other harmful chemicals were released into the air. The contractor has been observed “knowingly” releasing contamination into the air (see video). https://m.youtube.com/watch?v=14uvCojtSg8

Pedestrians have experienced respiratory problems walking down Chambers St. Residents have complained of sickness. Students using athletic fields have complained of respiratory problems. Visitors at Saint Francis Hospital have complained of air pollution. Residents have also complained about the ground shaking.

On or about October 15, 2015, the Trenton School District, City of Trenton, New Jersey Department of Environmental Protection, and New Jersey Department of Environmental Protection was notified about the environmental problems and violations at 400 Chamber St. On or about 9/15/15, the New Jersey State Ethics Commission, New Jersey Board of Examiners, New Jersey Schools Ethics Commission, New Jersey State Board of Examiners, and the New Jersey Office of Attorney Ethics was been notified to report the ethical violations and hold various individuals accountable.

According to the New Jersey Department of Education, the ethnic breakdown of students at Trenton Central High School is 49.7% Black and 47.6% Hispanic (2013-2014 School Year). According to the United States Census, the ethnic breakdown for the City of Trenton is 33.7% Hispanic and 52% Black.

The failure of the New Jersey Department of Environmental Protection, Trenton School District, New Jersey Department of Community Affairs, City of Trenton, New Jersey Department of Education to protect the environment will have an adverse impact on the environment, in violation of the Clean Air Act and Title VI of the Civil Rights Act of 1964, as amended.

From: (b) (6) Privacy, (b) (7)(C) En[redacted]
To: Title VI Complaints
Subject: EPA Complaint-Trenton Central High School
Date: Friday, October 23, 2015 1:17:36 PM

In October of 2014, the Trenton Board of Education voted unanimously to demolish Trenton Central High School. On or about April 1, 2015, preconstruction activities began at Trenton Central High School. These preconstruction activities included, but not limited to: demolition, remediation and site investigation. The Trenton School District and New Jersey Department of Education failed to adhere to State regulations regarding demolition and preconstruction activities. For example, preconstruction activities cannot begin until a School District has an approved Long-range facilities plan. Preconstruction activities began at TCHS although the LRFP was not approved until June 1, 2015 in violation of (NJAC 6A:26-3.9b.) The 2007 LRFP expired in 2012. In addition, the Trenton School District failed to close 400 Chamber St. pursuant to (NJAC 6A:26-7.5). The Trenton School District as the owner of 400 Chamber St, has refuse to hire a project manager with a background specifically in construction, environmental remediation, and architecture to oversee the activities of the contractor hired by the Jersey Schools Development Authority (SDA), in an unbiased manner.

On or about May 8, 2015, the New Jersey Department of Environmental Protection (DEP) provided conditional approval to commence demolition activities. The DEP noted that a licensed site remediation professional was not on site. The DEP also detected high-levels of contamination at this site. An Environmental Assessment report was competed for 400 Chambers St. However, the report was falsified.

Thus far, various wings have been demolished at Trenton Central High School. The “A” and “D” wings remain standing. The New Jersey Department of Community Affairs has issued demolition permits. However, the “A ”and “D” wings are also slated for demolition, although the remediation remains incomplete. The B, C, E, and F wings have already been demolished although remediation was not finished. Air monitors were installed at 400 Chambers Street. However, these air monitors were defective and manipulated by the contractor to prevent an accurate reporting of air quality. The City of Trenton has “shut off water” at 400 Chambers St. which has allowed the demolition contractor to be eligible to apply for a demolition permit. The City of Trenton also “shut off” water although the Trenton School District, failed to officially close Trenton Central High School in accordance with State regulations.

On or about September 11, 2015, dust, asbestos and other harmful chemicals were released into the air. The contractor has been observed “releasing" contamination into the air (see video). https://m.youtube.com/watch?v=14uvCojtSg8

Pedestrians have experienced respiratory problems walking down Chambers St. Residents have complained of sickness. Students using athletic fields have complained of respiratory problems. Visitors at Saint Francis Hospital have complained of air pollution. Residents have also complained about the ground shaking.

On or about October 15, 2015, the Trenton School District, City of Trenton, New Jersey Department of Environmental Protection, and New Jersey Department of Environmental Protection was notified about the environmental problems and violations at

400 Chamber St.

According to the New Jersey Department of Education, the ethnic breakdown of students at Trenton Central High School is 49.7% Black and 47.6% Hispanic (2013-2014 School Year). According to the United States Census, the ethnic breakdown for the City of Trenton is 33.7% Hispanic and 52% Black.

The failure of the New Jersey Department of Environmental Protection, Trenton School District, New Jersey Department of Community Affairs, City of Trenton, New Jersey Department of Education to protect the environment will have an adverse impact on the environment, in violation of the Clean Air Act and Title VI of the Civil Rights Act of 1964, as amended.

From: [redacted]
To: Title VI Complaints
Subject: EPA complaint against New Jersey Department of Environmental Protection
Date: Thursday, December 17, 2015 12:19:16 PM

Parents, Community, an Trenton Residents

vs
New Jersey Department of Environmental Protection
City of Trenton
Trenton School District
New Jersey Department of Community Affairs

On or about May 8, 2015, the New Jersey Department of Environmental Protection (DEP) provided conditional approval to commence demolition activities at Trenton Central High School. Subsequently, the DEP provided final approval. The City of Trenton later disconnected water service. Area residents have complained of numerous illnesses related to the demolition site, including, but not limited to: asthma, bronchitis, and skin rashes. Contamination has been detected on the site of 400 Chambers St. in Trenton, N.J. On December 15, 2015, the Trenton School District escorted students to the demolition site and watched the demolition activities. Students were exposed to an unsafe demolition site. Photographs of children on the demolition site, were posted on the website of the Trenton School District. **The New Jersey Department of Environmental Protection failed to implement "effective" safety measures to protect the health and safety of children**. **The remedial Action Outcome for Trenton Central High School remain unapproved and incomplete**; however the New Jersey Department of Environmental Protection has permitted the Trenton School District to continue demolition activites. According to the New Jersey Department of Education, majority of the students at Trenton Central High School-Chambers are classifed as Latino or African American. The New Jersey Department of Environmental Protection, Trenton School District, City of Trenton, and the New Jersey Department of Community Affairs, failed to protect the health and safety of children and the community, in violation of the Clean Air Act, and VI of the Civil Rights Act of 1964, as amended.

From: [redacted]
To: Golightly-Howell, Velveta; Dorka, Lilian; Title VI Complaints
Subject: EPA complaint-Trenton Central High School (Submitted on 1-20-16)
Date: Wednesday, January 20, 2016 2:03:24 PM

Please accept the following EPA complaint.

Submitted to EPA on January 20, 2016

Director of the Office of Civil Rights
U.S. Environmental Protection Agency
Mail code 1201A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Trenton Community

vs

New Jersey Department of Education
Trenton School District
City of Trenton
County of Mercer, New Jersey
New Jersey Department of Community Affairs (DCA)
New Jersey Department of Environmental Protection (DEP)

During October 2014, the Trenton Board of Education voted unanimously to demolish Trenton Central High School. On or about May 8, 2015, the New Jersey Department of Environmental Protection (DEP) provided approval to commence demolition of Trenton Central High School. On May 8, 2015 the DEP also confirmed numerous environmental violations at 400 Chambers St. in Trenton, N.J. On May 8, 2015, a spokesperson from the New Jersey Schools Development Authority (SDA) publicly confirmed that the site was being remediation by a Licensed Site Remediation Professional (LSRP). However, it was later confirmed that no LSRP was on site at one point. The Environmental Assessment for Trenton Central High School confirmed contamination at 400 Chambers St in Trenton., such as asbestos, mercury, lead, and other harmful elements. The assessment also noted approvals needed from The County of Mercer, New Jersey and other government agencies in order to begin demolition.

On June 1, 2015, the New Jersey Department of Education approved the long-range facilities plan for the Trenton School District. The LSRP confirmed the District and State's intention to demolition Trenton Central High School. During April of 2015, demolition began at Trenton Central High School. During October of 2015, the demolition contractor was observed releasing contamination into the air (see video).

https://www.youtube.com/watch?v=14uvCojtSg8

Residents have complained of various respiratory illnesses. The contractor has also failed to use effective water suppression measures. On numerous occasions the contractor has

improperly used water from a fire hydrant of the City of Trenton.

On or about December 18, 2015, a representative from the City of Trenton publicly raised concerns about the environmental conditions at Trenton Central High School. On numerous other occasions the City of Trenton was notified of the environmental problems at 400 Chambers St. in Trenton, N.J. However, the City of Trenton has failed to enforce the municipal code and take action. The City of Trenton has failed to used its authority to halt demolition. Both the City of Trenton and State of New Jersey have some jurisdiction over Trenton Central High School regarding code enforcement. The Trenton School District remains under the ownership of the Trenton School District and is still subject to both municipal and State regulations. Ownership of 400 Chambers St. in Trenton, N.J. has yet to be transferred to the State of New Jersey.

Numerous employees of the City of Trenton, Trenton School District, New Jersey Department of Environmental Protection, New Jersey Department of Education, and New Jersey Department of Community Affairs were notified of the demolition and environmental problems at 400 Chambers. The measures taken thus far to address the environmental concerns at 400 Chambers St. have been ineffective.

The New Jersey Department of Community Affairs improperly issued demolition permits for Trenton Central High School. The State of New Jersey underfunded the demolition and remediation projects for Trenton Central High School. According to the most recent U.S. Census, majority of the residents living in the City of Trenton were classified as African American and Hispanic. In addition, a high concentration of African Americans and Latinos live around Trenton Central High School. On December 29, 2015, CB & I Government Solutions, Inc. issued a Summary Letter referencing Air Sample Analytical Results. The letter mentioned that the contamination at 400 Chambers St. In Trenton, NJ is acceptance according OSHA standards. However, the results do not indicate any raw data, statistics or information showing how the contractor acquired the air quality data. CB & I also issued other letters prior to December 29, 2015, which references acceptance OSHA standards. The City of Trenton, Trenton School District, County of Mercer, N.J., New Jersey Department of Environmental Protection, New Jersey Department of Community Affairs (DCA) failed to protect the health and safety of residents, in violation of the Clean Air Act, and the Title VI of the Civil Rights Act of 1964, as amended.