



Region 2 Enforcement & Compliance Assurance Division
Air Compliance Branch
CAA Inspection Report

Inspection Date: 7/24/2024
Facility Name: 49 Gingerbread Castle Rd
Facility Address: 49 Gingerbread Castle Rd, Hamburg NJ
ICIS-Air ID #: 3601694258
EPA Lead Inspector: Christopher Collins, Collins.Christopher.W@epa.gov
EPA Asst. Inspector: Victor Tu, tu.victor@epa.gov
Facility Contact: Joseph Park, Owner, joseph@selininy.com
State Inspector(s): James Harris, NJDOL, james.harris@dol.nj.gov
State Inspector(s): Ray Djurin, NJDOL, radovan.djurin@dol.nj.gov
State Inspector(s): Frank Cuomo, NJDOL, frank.cuomo@dol.nj.gov
State Inspector(s): Jim Vermeychuk, NJDOH, james.vermeychuk@doh.nj.gov

Pertinent Regulatory Requirements

40 CFR Part 61 Subpart M – Asbestos NESHAPs

Background

The property at 49 Hamburg Road has an industrial history dating back to 1768, serving various purposes including iron works, gristmill, flour milling, distilling, and cement production. Notable owners include Fred H. Bennett, Nabisco, and Plastoid, an insulated wire manufacturer that operated until the 1980s. Declared eligible for historic preservation in 2003, the site was purchased by Daoftre Capital Group LLC in 2021 for warehouse use.

The NJDOL and NJDOH began investigating the site after learning that an 11-story structure was demolished, and a 7-story structure was partially demolished prior to any asbestos survey or abatement. Upon discovery of the partial demolition of the 7-story structure, a subsequent stop-work order was issued by the Township of Hardyston's Building Department.

Summary of Onsite Observations

On July 14, 2024, an inspection was conducted at the former Wheatsworth Mill site located at 49 Hamburg Road. EPA (Christopher Collins and Victor Tu), NJDOL (James Harris, Ray Djurin, and Frank Cuomo), and NJDOH (Jim Vermeychuk) "the inspection team" arrived between 11:00 AM and 11:30 AM. Also in attendance were Joseph Park ("the Owner"), Frank Marino (Marino Corp USA), and Hardyston Township Building Department officials (Joe Butto and Dave Hammerle).

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Name	Job Title/Company	Email
Chris Collins	Inspector / US EPA	Collins.Christopher.w @epa.gov
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Figure 1: Roster.

Opening Conference:

The site, owned by Daoftre Capital Group LLC, and represented by Joseph Park ("the Owner"), consists of two main structures: an 11-story structure that was over 95% demolished and a 7-story structure that had undergone partial demolition (one wall removed).

The Owner explained that after receiving bids ranging from \$250,000 to \$1 million, they chose Bella Demolition as the contractor due to their lower price. Frank Marino was later hired as an asbestos consultant after concerns were raised about Bella's (the demolition company) work. The Owner mentioned that Selini New York is the operating company and proposed tenant for the site.

Inspector Tu asked if a pre-demolition asbestos survey was conducted prior to the start of the demolition of the site. Mr. Park stated that no pre-demolition asbestos survey was conducted prior to the demolition. Mr. Park also stated that one wall of the 7-story structure had been removed without his knowledge or consent, and that he had shown up to the site to find the structure missing a wall. The Owner also explained that there was no concrete crusher on site, and that demolition debris was being stored at two locations; where it fell and at an adjacent property across the street from the demolition site, referred to as "the debris field."

During the conference, The Owner called Travis Sarkisian (an employee of Bella Demolition) on the phone. Travis explained that the previous foreman, Thomas Garbett, was no longer on the project. Thomas Garbett owns Siteworks Services and was involved in the initial demolition. Travis mentioned that Thomas was supposed

to be asbestos certified, but Travis had not personally verified his credentials. Travis also stated that no waste had been removed from the site to a landfill or for recycling. The original plan was to bring concrete off-site to be crushed, but this had not occurred yet. EPA told Travis that they planned to have a follow-up call to discuss the Bella's involvement with this demolition project.

Joe Butto, a construction official for the Township of Hardyston, explained that a demolition variance was granted for the historic structure. Joe agreed to send documents related to the demolition to the EPA.

Site Tour:

The tour began at the demolition site. EPA asked if the Owner knew what the size of the structures were prior to demolition, and he said he did not know by memory. The inspection team requested structure blueprints to be sent via email. This property is around 4 acres.



Figure 2: Demolition Site. Note the removed wall on the 7-story structure, and the concrete and metal debris.

Frank Marino and Ray Djurin identified several materials that had been previously tested positive for asbestos during a prior DOL inspection (Figures 3-6):



Figure 3: Corrugated insulation.



Figure 4: Pink Cementous Material



Figure 5: Transite material.



Figure 6: ACM laying in debris pile from Figure 4.

The inspection team noted there was no signage on the gates, and no visible wetting of materials. They explained to the Owner that all materials need to be kept wet and documented with a logbook and photos demonstrating wetting. They also explained that signage should be present on the gates warning of asbestos, and that all waste is considered asbestos-contaminated. The inspection team further explained that all waste generated is considered asbestos containing waste material.

The Owner stated that the original plan was to demolish the 11-story structure, followed by the 7-story structure.

The tour continued to the debris field across the street, owned by Winners Property LLC (30 Gingerbread Castle Rd), an entity owned by the Owner's family. At this site, inspectors found Bella vehicles, containers with waste, and demolition waste laying on the ground and seemingly buried in the ground (see figure 7, 8 and 9).



Figure 7: Bella Truck with 20 cubic ft container.



Figure 8: Demolition Debris.



Figure 9: Bella Truck and debris, alternate angle. The red container was filled with metal at the time of inspection.

Numerous mounds of debris, what appears to be C&D debris, was observed on the site (Figure 10, 11 and 12). The Owner stated he does not believe that these debris pile are from the demolition project and had not seen this waste prior to the inspection. He also stated that he has only authorized Bellas to dump debris from this demolition project and nothing else.



Figure 10: Pile of waste which included non-construction waste.



Figure 11: Pile of waste material and "Bella" labeled containers.

Possible black tar was observed in the debris.

A second pile of debris was found further into the property, which appeared to contain non-construction waste (Figure 12). The Owner stated he had not seen this waste prior to the inspection and was unaware of its presence.



Figure 12: Pile of debris with non-construction waste.

The owner stated that the construction debris was originally placed in this area (see figure 13) of the property, until he instructed Bella to move the waste to where it is currently.



Figure 13: Site where construction debris was originally placed, before being moved to final site. Remanent of the demolition debris was still present on the ground.

The Owner informed the team that the debris field property is approximately 8-9 acres.

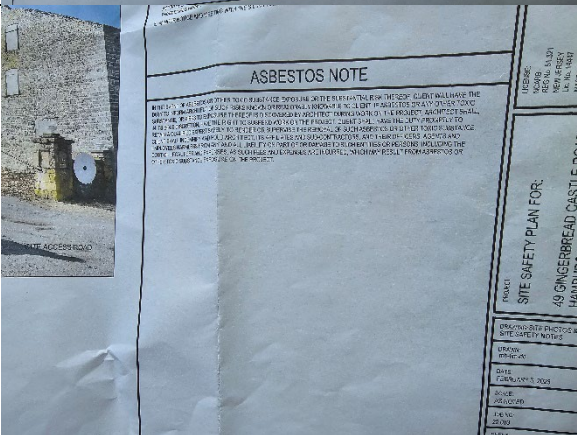
Closing Conference:

The inspection concluded with a closing conference where observations were discussed. The inspection team provided a timeframe for the inspection report and thanked everyone for their time.

Areas of Concern:

- Potential improper handling and disposal of asbestos-containing materials.
- Lack of required signage warning of asbestos.
- No visible wetting of materials containing asbestos.
- Uncertainty about asbestos certification of demolition personnel.
- Multiple debris piles with unknown content and origin, including some possibly from other sites.
- Possible burial of asbestos containing waste material into the ground.
- Lack of proper documentation and planning for asbestos management.
- Incomplete information about waste removal and recycling processes – i.e., missing concrete/waste.

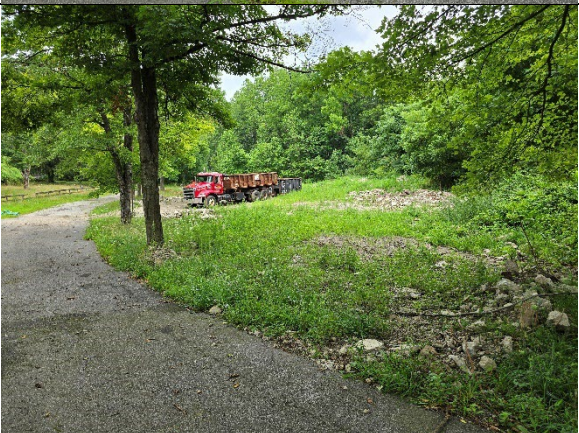
Appendix:

20240724_121510.jpg	Photo of the Site Safety Plan, shown by Joe Butto during the inspection.	
20240724_121615.jpg	"Asbestos Note" in Site Safety Plan, shown by Joe Butto during the inspection.	
20240724_123305.jpg	Demolition site	
20240724_124048.jpg	Asbestos transite material, Identified as ACM during prior DOL inspection	

20240724_124143.jpg	Asbestos pink material, Identified as ACM during prior DOL inspection	 A close-up photograph of a pile of debris, including concrete chunks, wood, and a piece of pink material. A yellow ruler is placed horizontally across the debris for scale. The ruler has text that reads "KOLBOLD WASTE DIVISION Measure Up & RECYCLE".
20240724_124203.jpg	Asbestos corrugated paper material, Identified as ACM during prior DOL inspection	 A close-up photograph of a pile of debris, including concrete chunks, wood, and a piece of corrugated paper. A yellow ruler is placed horizontally across the debris for scale. The ruler has text that reads "KOLBOLD WASTE DIVISION Measure Up & RECYCLE".
20240724_124248.jpg	Area where material was found	 A photograph showing a large pile of debris, including concrete chunks, wood, and metal, in an outdoor setting.
20240724_132002.jpg	Bella Truck with 20 cubic ft container	 A photograph of a red truck with a brown container, parked on a gravel surface. The truck has "Bella" and "20 cubic ft" written on its side. The background shows green trees and a blue sky.

20240724_132239.jpg	Demolition debris	
20240724_132338.jpg	Bella Truck and debris, alternate angle. The red container was filled with metal at the time of inspection.	
20240724_132451.jpg	Debris	
20240724_132620.jpg	Pile of waste which included C&D waste.	

20240724_132642.jpg	Pile of waste material and "Bella" labeled containers.	
20240724_132746.jpg	Interior of dumpster.	
20240724_134031.jpg	Pile of debris with C&D waste.	

20240724_134539.jpg	Site where construction debris was originally placed, before being moved to final site.	
20240724_135737.jpg	Bella Recycling truck.	
20240724_135843.jpg	Site where construction debris currently resides.	

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Photo of Roster

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Lead Inspector's Name: Christopher Collins

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Lead Inspector

Assisting Inspector's Name: Victor Tu

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Assisting Inspector

Supervisor's Name: Harish Patel

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Supervisor