

**Statement From Robbinsville Township Regarding PCP240001  
(aka. Princeton Memorial Park)**

**October 29, 2024**

**Updated: March 15, 2025**

On March 27, 2024, Robbinsville Township received a Land Use Application for a D-3 variance request for 304 Gordon Road, located within the Rural Residential Zone, and also known as Princeton Memorial Park Cemetery. Current State law allows crematoriums to be built in cemeteries, and the Township cannot deny such use. If we did, the Township could be subject to costly litigation by the applicants or others. Moreover, the time for appeal or reversal of the Board decision has expired, therefore we cannot bring it back for review by the Board.

The proposed building would be a 1,350 square foot, one-story structure, which is approximately the same size as a 2- or 3-bedroom apartment. The building will not be seen from either Gordon or Sharon Roads, nor from Sharon School due to specific landscape plans. Those plans include the existing mature tree line next to Sharon School and the location of the building in proximity to the New Jersey Turnpike.

A public hearing on the matter was held on June 18, 2024 during a Land Use Board meeting, at which time no one from the public spoke either for or against the application. Prior to that public hearing, certified letters were sent out to all landowners within 200 feet of the cemetery. There was no response to the notice.

The application was forwarded to the Robbinsville Environmental Commission for informational purposes as required by the Municipal Land Use Law. The Environmental Commission did not have a quorum at the time this application was on its agenda. The Commission's lack of comment is not grounds for the matter to return to the Land Use Board because they can only make recommendations and cannot require changes or deny the application. See N.J.S.A. 40:56A-1 et seq. Since this is not a redevelopment area, the application would not be presented to the Township Council as part of the approval process.

As per the Conditional Use granted to the applicant, the hours of operation for the proposed crematorium would be Monday through Friday from 9 a.m. to 5 p.m. During that timeframe, the crematorium would only be able to perform one or two cremations per day since the average length of a cremation, as per the manufacturer's specification of the unit, is 90-100 minutes. The hours referenced in the DEP draft application referred to maximum

operating conditions or 3,800 hours per year, 10 hours a day, 365 days per year. That will not be the case in this instance.

In focusing on the potential emissions piece in the NJ DEP permit application, the allowable outputs referenced on the permit application are the **maximum allowable outputs** as per State law (N.J.A.C 7:27). The applicant has to agree and prove that they will not exceed these emission rates. If they do, notification to the NJDEP is required, which may subject the applicant to fines. The cremation units have emission monitors built into the unit, which have to be operational at all times as per the permit requirements. In reviewing page 6 of 9 of the NJ DEP permit application, the numbers below are the **proposed actual outputs** based on the unit being installed.

- Volatile Organic Compounds = 0 tons/yr
- Sulphur Dioxide = less than 0.36 tons/yr
- Nitrogen Dioxide = less than 0.58 tons/yr
- Carbon Monoxide = less than 0.48 tons/yr
- Trisodium Phosphate = less than 0.77 tons/yr
- Ammonia = 0 tons/yr
- Lead = 0 tons/yr
- Methane = 0 tons/yr

In addition, there will be no visible emissions and no smell emanating from the unit. The DEP does enlist strict rules on how crematoriums operate, which crematoriums must follow at all times. The overall permitting process is very expensive, time-consuming and rigorous to ensure all requirements are met and overall operation is safe for both the employees and the surrounding public. The applicant also submitted an environmental impact study with the overall zoning application, which noted that the emissions from the New Jersey Turnpike would have a greater presence than the proposed crematorium.

Robbinsville Township has very limited power in preventing the proposed crematorium as it falls under the NJ DEP jurisdiction and the State Cemetery Board. The NJDEP held a three-hour public hearing on the proposed crematorium on March 4, 2025 at the Trenton Ancient Order of Hibernians. That hearing was originally scheduled for December 19, 2024, but was postponed at the request of the applicant.

Public comment on the draft permit was closed on March 14, 2025. The NJDEP will take public comment into consideration prior to determining the approval or denial of a permit.