

Appendix A-3

NJDEP Approval of Alternative Remediation Standard - Vanadium

Archived: Friday, March 12, 2021 8:54:51 AM

From: [Amin, Prabal](#)

Sent: Wed, 7 Nov 2018 15:45:35

To: [McLaughlin Jr., James \(ARCADIS\)](#) dspader@erfs.com PBaker@jcnj.org NStrasser@jcnj.org 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)' Lagrotteria, Joseph David.Doyle@dep.nj.gov remcaprealty@gmail.com Jray@mdmc-law.com ncolson@mdmc-law.com RRiccio@mdmc-law.com [Amend-Babcock, Laura Wayne Howitz \(Wayne.Howitz@dep.nj.gov\)](#)

Cc: [Overmyer, Jody Feinberg, Richard \[C\]](#) [Mastrocola, Krista](#)

Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

Sensitivity: Normal

Attachments:

[10.1.18 Submittal Finalization Process.pdf](#) 

On behalf of the New Jersey Department of Environmental Protection (Department), the submittal sent per the email chain below is acceptable. PPG should complete the finalization of the submittal in accordance with the Submittal Finalization Process (see attached).

Thank you.

Prabal N. Amin, P.E., LSRP

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205 Campus Drive

Edison, NJ 08837

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From: [McLaughlin Jr., James \(ARCADIS\)](#) [mailto:James.S.McLaughlin@arcadis.com]

Sent: Friday, October 5, 2018 4:01 PM

To: [Amin, Prabal](#) <Prabal.Amin@WestonSolutions.com>; dspader@erfs.com; PBaker@jcnj.org; NStrasser@jcnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)' <Dorothy.Laguzza@leclairryan.com>; Lagrotteria, Joseph <joseph.lagrotteria@leclairryan.com>; David.Doyle@dep.nj.gov; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com; RRiccio@mdmc-law.com; [Amend-Babcock, Laura](#) <Laura.Amend-Babcock@WestonSolutions.com>; [Wayne Howitz \(Wayne.Howitz@dep.nj.gov\)](#) <Wayne.Howitz@dep.nj.gov>

Cc: [Overmyer, Jody](#) <overmyer@ppg.com>; [Feinberg, Richard \[C\]](#) <feinberg@ppg.com>; [Mastrocola, Krista](#) <Krista.Mastrocola@arcadis.com>

Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

Mr. Amin,

Thank you for your review of the March 2018 *Technical Execution Plan – Site Soils; Site 107 Fashionland* (TEP). On behalf of PPG, Arcadis has revised the AMP in accordance with your comment per the email below dated September 27, 2018. If acceptable, this change will be incorporated into a Final Submittal.

This submittal includes the following elements:

- (1) Submittal Summary Sheet, Response to Comment, and AMP in RLSO (*attached PDF*)

(2) [Comprehensive TEP package for reference](#)

Regards,
Jim McLaughlin

James S. McLaughlin, PG, CSP | Certified Project Manager/Group Leader 3 | James.S.McLaughlin@arcadis.com

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Be green, leave it on the screen.

From: Amin, Prabal

Sent: Thursday, September 27, 2018 10:15 AM

To: McLaughlin Jr., James (ARCADIS) ; dspader@erfs.com; PBaker@icnj.org; NStrasser@icnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)'; Lagrotteria, Joseph ; David.Doyle@dep.nj.gov; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com; RRiccio@mdmc-law.com; Amend-Babcock, Laura ; Wayne Howitz (Wayne.Howitz@dep.nj.gov)

Cc: Overmyer, Jody ; Feinberg, Richard [C] ; Caballero, David ; Mastrocola, Krista ; Deal (Porto), Diann ; Holzer, Nadia

Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

On behalf of the New Jersey Department of Environmental Protection (Department), the revised components of the *Technical Execution Plan – Site Soils; Site 107 Fashionland* (TEP), submitted per the email below, are acceptable with the exception noted as follows.

Section 6.5 of the Air Monitoring Plan (AMP), presented as Appendix B of the TEP, should document that that Event Documentation Reports (EDRs) will also be developed if real-time 15-minute results exceed the Action Level. Furthermore, this section of the AMP should document that EDRs will be produced within 3 days after receipt of the analytical results and submitted to the Site Administrator for timely distribution, consistent with the procedures set forth within the AMPs implemented at the Garfield Avenue Group and at Site 63/65.

As a suggestion, the text *“In the event that integrated results exceed 80% of the AAC, an Event Documentation Report (EDR) will be prepared.”* could be replaced with the following language which was included in the approved Site 63/65 AMP: *“Event Documentation Reports (EDRs) are produced on a periodic basis to report any real-time 15-minute or integrated Cr6+ data results greater than the Action Level and/or 80% of the AAC, respectively. These EDRs are produced within 3 days after receipt of the analytical results and submitted to the Site Administrator for timely distribution.”*

Thank you.

Prabal N. Amin, P.E., LSRP

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From: McLaughlin Jr., James (ARCADIS) [<mailto:James.S.McLaughlin@arcadis.com>]
Sent: Monday, August 20, 2018 4:50 PM
To: Amin, Prabal <Prabal.Amin@WestonSolutions.com>; dspader@erfs.com; PBaker@jcnj.org; NStrasser@jcnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)' <Dorothy.Laguzza@leclairryan.com>; joseph.lagrotteria@leclairryan.com; David.Doyle@dep.nj.gov; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com; RRiccio@mdmc-law.com; Amend-Babcock, Laura <Laura.Amend-Babcock@WestonSolutions.com>; Wayne Howitz (Wayne.Howitz@dep.nj.gov) <Wayne.Howitz@dep.nj.gov>
Cc: Overmyer, Jody <overmyer@ppg.com>; Feinberg, Richard [C] <feinberg@ppg.com>; Caballero, David <David.Caballero@arcadis.com>; Mastrocola, Krista <Krista.Mastrocola@arcadis.com>
Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

Mr. Amin,

Thank you for your review of the March 2018 *Technical Execution Plan – Site Soils; Site 107 Fashionland* (TEP). On behalf of PPG, Arcadis has revised the submittal components in accordance with your comments per the email below dated June 29, 2018. If acceptable, these changes will be incorporated into the Final Submittal.

This submittal includes the following elements:

- (1) Submittal Summary Sheet, Responses to Comments (*attached PDF*)
- (2) TEP in RLSO (*attached PDF*)
- (3) [Tables, Figures, and Appendices A through G](#)

All report attachments are linked for reference, but only Appendices B and G required revision as part of this submittal.

Regards,
Jim McLaughlin

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Be green, leave it on the screen.

From: Amin, Prabal <Prabal.Amin@WestonSolutions.com>
Sent: Friday, June 29, 2018 1:48 PM
To: McLaughlin Jr., James (ARCADIS) <James.S.McLaughlin@arcadis.com>; dspader@erfs.com; BDoshi@jcnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)' <Dorothy.Laguzza@leclairryan.com>; joseph.lagrotteria@leclairryan.com; David.Doyle@dep.nj.gov; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com; RRiccio@mdmc-law.com; Amend-Babcock, Laura <Laura.Amend-Babcock@WestonSolutions.com>; Wayne Howitz (Wayne.Howitz@dep.nj.gov) <Wayne.Howitz@dep.nj.gov>
Cc: Overmyer, Jody <overmyer@ppg.com>; Feinberg, Richard [C] <feinberg@ppg.com>; Caballero, David <David.Caballero@arcadis.com>; Mastrocola, Krista <Krista.Mastrocola@arcadis.com>
Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

On behalf of the New Jersey Department of Environmental Protection (Department), the responses to comments on the TEP, submitted per the email below, are acceptable with the exception of the issues noted as follows:

Specific Comment 2 - Section 3.1.2.1, second paragraph: Reuse of soils (e.g., non-visually-impacted fill anticipated for reuse as backfill around the utility) in areas not within the limits of remedial excavation may only be done in conformance with the Department's Fill Material Guidance for SRP Sites (April 2015, Version 3), including the sampling frequency requirements to determine acceptability of soils proposed for reuse, and tracking/record-keeping requirements to document fill placement. The reuse plan would need to be submitted to the Department for review and approval.

Response to Specific Comment 2: The materials excavated as part of utility work will be used as backfill, but only temporarily. Since permanent reuse is not being proposed, no reuse plan is necessary. The text in Section 3.1.2.1 has been revised as indicated below:

Excavated materials will be placed on poly sheeting for visual characterization. Prior to backfill, the open excavation will be lined with poly, and the excavated materials will be temporarily replaced in the open excavation to within two feet of grade. A second sheet of poly will be placed across the excavation, and the area will be restored to grade with gravel. These materials will be removed during the large-scale excavation described in Section 6. Any excess material not replaced in the excavation will be staged in a roll-off for off-Site transportation and disposal.

Adequacy of Response to Specific Comment 2: Please note that if soils are disturbed related to utility work in the Site 67 right-of-way, reuse of those soils would not be considered "temporary" since the schedule for remediation of Site 67 is not known. Therefore, placement of this material within the Site 67 right-of-way area may only be performed under a Department-approved reuse proposal prepared in conformance with the Department's Fill Material Guidance for SRP Sites.

Specific Comment 5 - Section 6.3.1: The text references Appendix G for documentation of the SSSRS selection for vanadium. However, an updated Appendix G was not provided with the changed TEP components submitted on 4/1/18 and Appendix G included in the December 2017 TEP included information related only to the site-specific nickel IGWSSL request. Please ensure that the appropriate documentation for all alternate remedial standards obtained for the site are included in the revised TEP submittal as indicated in the response to General Comment 4 submitted 1/26/18, as well as in the future RAR.

Response to Specific Comment 5: The Site-Specific Impact to Groundwater Soil Remediation Standard (SS IGWSRS) for nickel and the Site-Specific Soil Remediation Standard (SSRS) for vanadium are both summarized in Section 6.3.1 of the revised TEP and described in detail in **Appendix G**.

Adequacy of Response to Specific Comment 5: Please provide the following information used to support the determination of the nickel site-specific Impact to Ground Water Soil Remediation Standard (IGWSRS).

- a. Data (e.g., groundwater elevation and soil sample elevation data) to confirm all samples used to develop the IGWSRS were collected from the vadose zone.

Additional Comments on TEP Revisions:

1. Air Monitoring Plan:
 - a. Page 11, Section 6.5. Please include the requirement to provide an Event Documentation Report (EDR) in the event that integrated results exceed 80% of the AAC. Refer to Site 63 AMP Section 7.1 as an example of this discussion.
 - b. Page 21, Section 10.2.3, third sentence. Database and summaries should also include analytical results for integrated PM10 sampling.
 - c. Page 25, Section 11.3, the end of the 1st paragraph should be edited to remove "...Safety Level of 46.36 nanograms per cubic meter (ng/m³) CrVI", and the correct Acceptable Air Concentration should be provided.

Thank you.

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From: McLaughlin Jr., James (ARCADIS) [<mailto:James.S.McLaughlin@arcadis.com>]

Sent: Friday, June 8, 2018 3:34 PM

To: Amin, Prabal <Prabal.Amin@WestonSolutions.com>; dspader@erfs.com; BDoshi@jcnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)' <Dorothy.Laguzza@leclairryan.com>; Lagrotteria, Joseph <joseph.lagrotteria@leclairryan.com>; David.Doyle@dep.nj.gov; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com; RRiccio@mdmc-law.com; Amend-Babcock, Laura <Laura.Amend-Babcock@WestonSolutions.com>; Wayne Howitz (Wayne.Howitz@dep.nj.gov) <Wayne.Howitz@dep.nj.gov>

Cc: Overmyer, Jody <overmyer@ppg.com>; Feinberg, Richard [C] <feinberg@ppg.com>; Caballero, David <David.Caballero@arcadis.com>; Mastrocola, Krista <Krista.Mastrocola@arcadis.com>

Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

Greetings,

Thank you for your review of the March 2018 Technical Execution Plan – Site Soils; Site 107 Fashionland (TEP). On behalf of PPG, Arcadis has revised the attached submittal components in RLSO in accordance with your comments per the email below. If acceptable, these changes will be incorporated into the Final Submittal.

This submittal includes the following:

1. [Submittal Summary Sheet and Responses to Comments](#)
2. Revised TEP in RLSO (attached Word document)
3. [TEP Tables and Figures](#)
4. [Appendix A- HASP](#)
5. Appendix B- AMP in RLSO (attached Word document) and [AMP attachments](#)
6. Appendix C- SMP in RLSO (attached Word document)
7. [Appendix D- QAPP](#)
8. [Appendix E- Contract Drawings](#)
9. [Appendix F- Support of Excavation Drawings](#)
10. [Appendix G- Proposed Alternative Soil Remediation Standards](#) in RLSO

Regards,

Jim McLaughlin

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Be green, leave it on the screen.

From: Amin, Prabal <Prabal.Amin@WestonSolutions.com>

Sent: Friday, May 4, 2018 11:25 AM

To: McLaughlin Jr., James (ARCADIS) <James.S.McLaughlin@arcadis.com>; dspader@erfs.com; BDoshi@icnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)' <Dorothy.Laguzza@leclairryan.com>; Lagrotteria, Joseph <joseph.lagrotteria@leclairryan.com>; David.Doyle@dep.nj.gov; Cozzi, Tom <Tom.Cozzi@dep.nj.gov>; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com; RRiccio@mdmc-law.com; Amend-Babcock, Laura <Laura.Amend-Babcock@WestonSolutions.com>; Wayne Howitz (Wayne.Howitz@dep.nj.gov) <Wayne.Howitz@dep.nj.gov>

Cc: Overmyer, Jody <overmyer@ppg.com>; Feinberg, Richard [C] <feinberg@ppg.com>; Talbot, Daniel <Daniel.Talbot@arcadis.com>; Mastrocola, Krista <Krista.Mastrocola@arcadis.com>

Subject: RE: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

On behalf of the New Jersey Department of Environmental Protection (Department), please find comments herein on the March 2018 Technical Execution Plan – Site Soils; Site 107 Fashionland, Jersey City, New Jersey (TEP) submitted per the email below on 4/1/18. Note that our review was limited to those revised TEP components submitted by Arcadis via the email below. A final TEP should be prepared and submitted to incorporate the changes made to the December 2017 TEP as documented in the March 2018 TEP components submitted on 4/1/18, and also to incorporate the changes needed to address the comments below.

General Comments

1. Please ensure that documentation of the agreement between PPG and Honeywell indicating Honeywell's agreement to assume responsibility for remediation within HCC Site 67 (including the utility easement) is provided in the future Remedial Action Report (RAR).
2. Please ensure the findings from the recent test pitting activities are incorporated into the final cut lines as appropriate. It is anticipated that these changes to the drawings will not negatively impact PPG's ability to achieve the Excavation Start milestone.

Specific Comments

1. General Comment 5 (submitted on 1/26/18) to the December 2017 TEP was adequately addressed in the text of Section 1. However, the referenced Figure 2 was not included in the TEP components submitted on 4/1/18. Please ensure that Figure 2 is revised to clearly identify that remediation within Block 27401 Lots 40 and 41 and the easement associated with Block 27401 Lots 42 and 43 will be addressed by Honeywell.
2. Section 3.1.2.1, second paragraph: Reuse of soils (e.g., non-visually-impacted fill anticipated for reuse as backfill around the utility) in areas not within the limits of remedial excavation may only be done in conformance with the Department's *Fill Material Guidance for SRP Sites* (April 2015, Version 3), including the sampling frequency requirements to determine acceptability of soils proposed for reuse, and tracking/record-keeping requirements to document fill placement. The reuse plan would need to be submitted to the Department for review and approval.
3. Section 4.1.1: As previously stated in Specific Comment 11 to the December 2017 TEP, use of a decontamination pad (and/or truck washing station) to perform adequate equipment decontamination should be included in the remedial plan. Dry decontamination of equipment is not acceptable, nor is wet decontamination over an open (presumably contaminated) excavation or on poly sheeting. Also, please ensure that the levels of personnel protection are appropriate based on the known contaminant concentrations (up to 27,600 mg/kg of hexavalent chromium) measured to date at the site.
4. Section 6.1, second bullet: If remediation of impacts near sensitive infrastructure on Site 108 requires a remedy different than that identified in the Site 107 Remedial Action Work Plan (RAWP), PPG would be required to prepare a RAWP Addendum for Site 107 (covering the additional work at Site 108) rather than a separate TEP.
5. Section 6.3.1: The text references Appendix G for documentation of the SSSRS selection for vanadium. However, an updated Appendix G was not provided with the changed TEP components submitted on 4/1/18 and Appendix G included in the December 2017 TEP included information related only to the site-specific nickel IGWSSL request. Please ensure that the appropriate documentation for all alternate remedial standards obtained for the site are included in the revised TEP submittal as indicated in the response to General Comment 4 submitted 1/26/18, as well as in the future RAR.
6. Section 6.4.3: Please ensure the final surface is consistent with state and local erosion control requirements.
7. Section 7: Please ensure that a site survey will also be provided to document the limits of the remedial excavation. Those limits of excavation, sealed by a licensed surveyor, must be included in the RAR.

8. Tables 1 and 2: Tables 1 and 2 were not included with the revised TEP components submitted on 4/1/18; however, it is understood that these tables must be changed to be consistent with the currently-proposed limits of excavation. Please ensure that Tables 1 and 2 are revised to be consistent with the data presented on 3/13/18 during a technical working session between Weston and Arcadis.
9. Appendix A - HASP: Arcadis acknowledged Specific Comment 19 to the December 2017 TEP related to the Health and Safety Plan (HASP) and indicated that the HASP was revised to address the comments. However, it is noted that the revised HASP was not provided and therefore this response could not be confirmed.
10. Appendix B - CAMP: The following comments are made to the revised Community Air Monitoring Plan (CAMP).
 - a. CAMP General Comments:
 - i. For consistency with other JCO sites, please change the name of this plan to the Air Monitoring Plan (AMP) rather than the Community Air Monitoring Plan (CAMP), and update all references accordingly throughout the document, including on the Figures.
 - ii. Please recalculate the PM10 Action Level (AL), the PM10 early warning alert level(s) and Acceptable Air Concentration (AAC) for hexavalent chromium using bases for calculation that are consistent with those utilized for the other non-Garfield Avenue Group (non-GAG) sites (e.g., Site 16, Site 63, Metropolis Towers).
 - iii. Section 5.2 indicates "*Heavy metals detected above NJ State cleanup criteria in Area 107 included: antimony, total chromium, hexavalent chromium, nickel, thallium, and vanadium.*" To ensure the Air Monitoring Plan also addresses non-CCPW contaminants (if present), please evaluate and provide any non-CCPW soil data that may be available from within the footprints of proposed soil excavation (e.g., waste classification information). This data must be evaluated to characterize the potential for non-CCPW air impacts during remedial excavation. Based on this evaluation, the AMP should be modified accordingly.
 - iv. In addition to the stationary air monitoring stations, the use of hand-held air monitoring is appropriate for this site as has been used at other JCO sites. Discussions of hand-held monitoring should be added throughout the AMP. See Site 63 AMP (Sections 3.6 and 4.3.1) or Site 16 AMP (Section 4.2) for more details.
 - v. To be consistent with the approach used at the other non-GAG sites, the collection of 24-hour and 72-hour integrated samples should be included in the AMP.
 - b. AMP Specific Comments:
 - i. Section 4, third paragraph ends with note that the fifth AMS will be... "*activated if required*". Please specify the conditions under which a fifth AMS would be required.
 - ii. Section 7, second paragraph refers to Perimeter Air Exceedance Log – if this is equivalent to the Event Documentation Reports (EDRs) at other JCO sites, please use consistent terminology. Also Section 11 - Program Documentation needs to include a discussion of this Log.
 - iii. Section 7.2 notes that the AAC is based on cancer risk, but the value presented is the non-carcinogenic AAC calculated in Attachment 1. Please verify and edit the text appropriately.
 - iv. Section 8 – the description of the data to be collected during the background air monitoring should specifically include Cr⁺⁶ monitoring in addition to PM10 monitoring identified, which is inferred by the language in the last paragraph stating "*background monitoring period will provide a general sense of PM10 and hexavalent chromium concentrations and meteorological conditions*".
 - v. Section 9.1 ends with a mention of "*...heavy metals from air samples.*" List specific heavy metals at this site in parentheses after "heavy metals." See Specific Comment 10 a iii.
 - vi. Section 10.2 should include more details about sample data management and data validation. Refer to Site 63 AMP (Sections 5.4-5.5) and Site 16 AMP (Section 6.4.4).
 - vii. Section 10.3.1, first sentence should be edited as follows "*The aerosol particulate monitors will be inspected daily and each day a zero check will be performed before any soil-disturbing activities occur.*"
 - viii. Add to section 11 a discussion of information to include when reporting exceedances of action levels (see Site 63 AMP, Section 6.3) in Logs/EDRs. See also Specific Comment 10 b ii.
 - ix. Section 11.1 should also include mention of hand-held data to be reported in Weekly Reports.
 - x. Figure 2, please ensure the Air Monitoring Stations are relocated as the remedial action progresses to ensure that they are placed to be protective of off-site receptors, including the light rail station and

residences located to the west of the Site.

11. Appendix C – SMP: The following comments are made to the revised Stockpile Management Plan (SMP).
 - a. The Non-Hazardous and Hazardous Soil section of the SMP discusses the use of Calciment® or equivalent as an additive that may be used to stabilize excavated soils that are too wet to be transported. If this practice may be used, it should also be mentioned within the body of the TEP proper, where it was not included.
 - b. Please reinstate the requirement for the contractor to develop a spill contingency plan to protect stormwater quality at the site.
 - c. Please revise the Waste Disposal section to be consistent with the changes required to address Specific Comment 3 above.
12. Appendix D – QAPP: Arcadis acknowledged Comment 22 to the December 2017 TEP related to the Quality Assurance Project Plan (QAPP) and indicated that the QAPP was revised to address the comments. However, it is noted that the revised QAPP was not provided and therefore this response could not be confirmed.
13. Appendix E – Contract Drawings:
 - a. A truck decontamination pad/truck washing station is required (see Specific Comment 3); the location of this pad/station should be shown on Drawing 3. Additionally, Drawing 3 should include the location of the stabilized construction entrance.
 - b. As depicted in Cross Section 2 and 4 on Drawing 8, there is a several-foot differential between existing and proposed final grade along the northeastern side of the section. Please ensure that final grade ties to existing grade along the boundary of the excavation.
14. Appendix F – SOE Drawings: PPG is reminded that, regardless of the use of trench boxes to facilitate remedial excavation in proximity to property boundaries, sidewall and bottom samples must be obtained to document remedial completion (and/or document residual contamination within the property to be addressed by Honeywell) consistent with the sampling frequencies identified in Section 6.3 of the TEP.
15. Appendix G – Site-Specific Impact to Groundwater Standard: Arcadis acknowledged Comment 19 to the December 2017 TEP related to the Impact to Groundwater Soil Screening Level (IGWSSL) standard calculation for nickel, indicated that concentrations were confirmed, and stated that analytical reports were provided to document the values. However, the laboratory reports were not provided as indicated and therefore this response could not be confirmed.

Thank you.

Prabal N. Amin, P.E., LSRP

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From: McLaughlin Jr., James (ARCADIS) [<mailto:James.S.McLaughlin@arcadis.com>]

Sent: Sunday, April 1, 2018 1:51 PM

To: dspader@erfs.com; BDoshi@cnj.org; 'Laguzza, Dorothy M. (Dorothy.Laguzza@leclairryan.com)'

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Cozzi, Tom <Tom.Cozzi@dep.nj.gov>; remcaprealty@gmail.com; Jray@mdmc-law.com; ncolson@mdmc-law.com;

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<Daniel.Talbot@arcadis.com>; Mastrocola, Krista <Krista.Mastrocola@arcadis.com>

Subject: PPG- Responses to Comments/Final- TEP- NGA Site 107 _Doc#107-004

Hello Prabal,

Thank you for your review of the Technical Execution Plan for the Non-Garfield Avenue Group (NGA) Chromium Site 107 in Jersey City, Hudson County, New Jersey. Arcadis has prepared the attached responses to your comments on behalf of PPG. These responses will be incorporated into the final submittal. Select revised TEP components, including a changes-tracked version of the text, are also attached in a zip file if needed for reference. A submittal summary sheet (SSS) is included with this email which outlines further detail.

Regards,
Jim McLaughlin

James S. McLaughlin, PG, CSP | Certified Project Manager/Group Leader 3 | James.McLaughlin@Arcadis-us.com

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From: Amin, Prabal <Prabal.Amin@WestonSolutions.com>

Sent: Friday, January 26, 2018 12:52 PM

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Cc: Overmyer, Jody <overmyer@ppg.com>; Feinberg, Richard [C] <feinberg@ppg.com>

Subject: RE: PPG- For Review- TEP- NGA Site 107

Please see the following NJDEP/Weston comments on the December 2017 Technical Execution Plan (TEP) developed for Site 107 Fashionland, Jersey City, New Jersey, submitted per the email below:

General Comments:

1. These comments consider prior comments made on the adequacy of terminal depth proposals previously provided by CB&I (currently APTIM) on behalf of PPG under separate cover. It should be noted that comments were made on PPG's cutline submittal made by CB&I in June 2016 which had not been responded to or addressed by PPG.
2. The horizontal excavation limits as shown do not appear to fully address contaminants identified during the remedial investigation and pre-design phases of investigation at the site. For example, the proposed excavation limits do not encompass the "Site 108 hotspot" identified on the northern corner of Site 108 adjacent to Site 107 and the Conrail property, do not appear to extend the excavation to within the Conrail right-of-way into the northwestern edge of Site 108, and do not extend around sample location 107_G046 to the northeast to address exceedances observed in delineation samples GD014 and GD015. All identified areas of contamination must be addressed by the proposed remedial action.
3. The vertical excavation limits as shown and presented in Table 1 do not adequately address the CCPW-related contamination at depth, in particular noted at locations ED001 (Sb exceedance @6-6.5 ft bgs), ED013 (Va exceedance @14-14.5 ft bgs), GD012 (Cr⁺⁶ exceedance @8.5-9 ft bgs), 108_M018E2 (Cr⁺⁶ exceedance @3.5-4 ft bgs), and 107_E031 (Ni exceedance @11.5-12 ft bgs). All identified areas of contamination must be addressed by the proposed remedial action.
4. Several locations require remedial action due to elevated vanadium concentrations. Please note that NJDEP has made an Alternative Remediation Standard available for vanadium based on the USEPA Regional Soil Screening Level of 390 mg/kg for residential exposure and additional data available to the Department. Should PPG wish to apply for an

alternative remedial standard for vanadium at Site 107, the appropriate form and supporting information must be submitted. Please see http://nj.gov/dep/srp/srra/forms/alt_soil_remediation_standard_application_ins.pdf?version_2_2.

5. As indicated in a few locations within the TEP, PPG plans to defer remediation of CCPW-impacted materials in certain areas, e.g., within the easement/right-of-way. The TEP should briefly discuss the agreement between PPG and Honeywell regarding the remediation on Site 67, and provide a drawing that depicts the Site 67 limits relating to the area of deferred remedial action.
6. The Demolition Plan within the contract drawings identifies at least one monitoring well will be abandoned during the soil remedial action. The TEP is silent on the permits required and activities to be performed associated with the abandonment of this well. This information should be included in the TEP. Additionally, please revise the TEP to document that wells which are abandoned will be replaced as necessary to meet the needs of the groundwater investigation/remedial action.

Specific Comments:

1. Section 1.1.1, first paragraph: It is noted that the investigations subsequent to the site investigation identified the presence of CCPW in soils beyond the building slab.
2. Section 1.1.2: The text of this TEP section suggests that IRM activities were completed in 2003; however, it is noted that subsequent IRM inspections, repairs, and renovations have been conducted between 2003 and the present time. Please note that the RAR must document all IRM activities conducted at the site.
3. Section 1.1.3: The text states that an excavation support system will likely be necessary in areas where the remedial excavation exceeds 10 feet. Please note that post-excavation samples must be collected to document the remedial completion consistent with Department guidance regardless of the presence/location of an excavation support system. Also note that dewatering must be sufficient to visualize the limits of excavation to confirm the removal of all visible CCPW.
4. Section 2.2: Please complete the fourth bullet.
5. Section 3.1.2: Please ensure that materials generated during soft digging to expose utilities during the utility investigation are managed appropriately to ensure no cross-contamination of contaminated and clean areas on the site.
6. Section 3.1.4: As per Construction Drawing 4. The temporary chain link fence will be installed within the limits of excavation between the building to be demolished and the northwestern limits of excavation within the Conrail right-of-way. Please describe how security will be achieved for those portions of the remedial excavation beyond the site limits and during those periods when excavation requires removal of the temporary fence.
7. Section 3.2.1: The text infers that the 6-ft chain link fence is the limit of disturbance. See Specific Comment 6.
8. Section 3.2.3: The two locations of the temporary construction entrance described in the text do not agree with the single location depicted on Contract Drawing 4. Please ensure the document is internally consistent, and agrees with the Soil Erosion Sediment Control Plan.
9. Section 4.2.1: CCPW and Cr⁺⁶-contamination in soils may cause blooming following demolition of the structure's slab foundation and footers and during remedial excavation. PPG may wish to maintain an on-site source of substance(s) successfully used at the Garfield Avenue Group of sites to control blooms (e.g., Formula 480) as appropriate.
10. Section 5.1: See General Comments 2 and 3.
11. Section 5.2: Decontamination of personnel and equipment on a hazardous waste site shall be in adherence to Federal and State regulations. Due to the hazardous nature of the source material and hexavalent chromium concentrations (see Specific Comment Appendix A, HASP), the decontamination procedures for trucks and loading equipment from the exclusion zone area is deemed unacceptable. Decontamination procedures (e.g., decontamination pad, etc.) must be developed and implemented to ensure: (a) appropriate construction methods and management of waste removal and transportation are used to ensure and prevent cross contamination between contaminated areas and uncontaminated areas (both on-site and between the site and public roadways); (b) airborne potential of hexavalent chromium is managed and controlled during load-out/disposal activities; (c) SESCP requirements with regards to decontamination areas and soil/sediment control from active excavation areas to direct transport on public roadways are being implemented; and (d) elimination of the potential for contamination exiting the site onto public areas and roadways.
12. Section 5.2.3: Please describe in detail the methods that will be employed to prevent the release of contamination (e.g., sifting of soils, draining of impacted water entrained in excavated soils) from vehicles during road transportation

- for off-site disposal.
13. Section 5.3: The sidewall sampling frequencies identified are acceptable as stated in the first bullet, except that at least one sidewall sample is required for each sidewall of each excavation perimeter. It is noted that, relative to post-excavation samples *“required in locations where the previous design investigation sampling is not completed or is deemed insufficient”*, it is noted that a list of such locations was developed as part of the cut-lines generation/review process discussed in General Comment 1. It is recommended that PPG consider adopting that list.
 14. Section 5.3.1, Table 2: See General Comment 4.
 15. Section 5.5.1: The TEP calls for “flooding the open excavation with EVO [emulsified vegetable oil], molasses, or FerroBlack®” depending on the findings of groundwater samples to be collected as part of the mobilization activities. If this activity will be performed in more than one property (e.g., on Conrail right-of-way) please ensure that all applicable properties are included in the PBR application. Additionally, considering the Excavation Start Master Schedule milestone of June 2018, it is not clear whether groundwater data can be obtained and a Permit-by-Rule (PBR) application be developed and approved in the time allotted. Please note that either amending backfill or directly treating groundwater may only be performed under an approved PBR. Also note that the 2012 Site 108 RIR indicated an exceedance of the GWQC for chromium in permanent monitoring well 108_MW-7, collocated with soil boring 108_M018 and within the Site 108 soil hot-spot along the Conrail right-of-way. PPG should consider the Site 108 groundwater delineation/treatment during its planning for Site 107 groundwater.
 16. Section 5.5.2: See General Comment 5.
 17. Table 1: Many of the elevation data points (e.g., top of CCPW, bottom of CCPW, top of clean) identified for the borings are not consistent with data presented, reviewed, and agreed to/commented on during the previously performed cut lines review and comment process. It is noted that a number of elevation CCPW references are not consistent with boring logs as provided in historic submittals. It is recommended that PPG and Arcadis consider data tabulated in the September 2014 cut-lines submittal as commented via email on 12/5/14. Weston is willing to meet to discuss the specific data points.
 18. Figure 3: See General Comments 2 and 3.
 19. Appendix A, HASP: Please ensure that chromium specific requirements, set forth at 29 CFR 1910.1026 and 29 CFR 1926.1126, are met in the HASP. It is also noted that the maximum Cr⁺⁶ concentration reported in the HASP (99.4 mg/kg) is not accurate. Concentrations as high as 27,600 mg/kg (107_M026W2 at a depth of 1.5-2 ft bgs) were reported in the January 2013 draft Remedial Investigation Report. Please note that exceedances of vanadium and nickel were also detected in site soils; PPG should consider whether these constituents should be added to the HASP.
 20. Appendix B, CAMP:
 - a. The plan to use 30-minute averages for real-time monitoring is not acceptable; PPG must use 15-minute averages similar to what was done during remedial actions at Sites 16 and 63.
 - b. Please provide the calculation basis for the action level and acceptable air concentrations presented in the CAMP. The basis for calculation should be consistent with that used for the other chrome sites under the JCO.
 - c. More detail about specific responsibilities and agency interactions are required in Section 3 (Roles and Responsibilities).
 - d. Section 11 discusses development of Monthly reports only. Consistent with the air monitoring programs implemented at Sites 16 and 63, development of weekly summaries is required, as are routine (biweekly) data uploads to the Chromium Cleanup Partnership website of the weekly summaries and the Monthly reports.
 - e. It appears as if Section 12 is incomplete; the last bullet ends with “...equipment and vehicular traffic; and”. Please complete.
 - f. The local wind direction should be evaluated to ensure that locations of CAMP stations are adequately protective of residents to the west (across the railroad tracks). Weston is willing to meet to discuss the station locations. In addition, the weather station location should be shown on Figure 2.
 - g. This area of Jersey City is subject to high wind speeds and multi-directional winds. Please clarify in the CAMP if there is a wind alert/weather condition for cut-off of intrusive activities.
 21. Appendix C: SMP:
 - a. The PPG Management Team section of the SMP indicates that the Remedial Contractor must develop “a comprehensive Execution Plan that will provide execution details such as utility termination, asbestos and universal waste abatement, sequencing of demolition, excavation and backfilling, waste stockpiling, and spill response.” Please note that the Remedial Contractor’s plan must be in conformance with the approved Remedial Action Work Plan and this TEP (once determined to be acceptable).

- b. Please specifically state that all material generated during the remedial action that are not direct-loaded for off-site disposal will be managed only within the Materials Staging Area(s), built consistent with the detail shown in the construction drawings.
 - c. See Specific Comment Section 5.2.3 re: the Generating Materials - Non-Hazardous and Hazardous Impacted Soil section of the SMP.
 - d. Please describe the methods that will be taken to prevent dust generation while *“excess soils will be shaken from concrete/debris to the reasonable extent possible prior to stockpiling”* in the Handling and Stockpiling Activities – Construction and Demolition Debris (Non-Hazardous and Hazardous) section of the SMP.
22. Appendix D: QAPP: The QAPP Addendum calls for preservation of soil samples by cooling to 6°C. The Department's Field Sampling Procedures Manual requires 4°C. Please correct.
23. Appendix E, Contract Drawings:
- a. The limits of horizontal and vertical limits of excavation shown in the various contract drawings do not agree with the limits of remedial action required as determined through the cut-lines development and review process performed during 2014-2016. Please revise the contract drawings to reflect the complete remedial limits. See General Comments 2 and 3.
 - b. The truck/traffic routes shown on Drawing 3 appear to impinge upon areas to be excavated. The locations of truck decontamination equipment must be provided to eliminate cross-contamination between contaminated and uncontaminated areas. Also note that the parcel to the north of Site 107 has been subsequently developed; this area may not be available as a truck route.
 - c. The southern material staging area depicted in Drawing 4 is in proximity to the northern excavation limits within the Conrail right of way. PPG may wish to consider adjusting the location of this staging area to ensure that the stockpile does not impede the excavation in the event that the excavation limit needs to be extended.
 - d. See General Comment 5 regarding the 30-mil PVC liner shown on Drawing 7.
24. Appendix F, SOE Drawings: Since note 6 on Drawing SOE-2 requires that excavation beyond the limits shown on Arcadis and MRCE Drawings may not be performed without a signed and sealed underpinning design, but the minimum cut-lines required to address the contamination within the Conrail right-of-way extend beyond those limits within Site 108 as per General Comment 2, PPG should ensure a signed and sealed underpinning design is developed in advance of breaking ground. These design drawings do not need to be submitted to the Department. It is noted that the current Master Schedule Exhibit 2/3 requires an excavation start date of June 2018.
25. Appendix G, Site-Specific Impact to Groundwater Standard: The Nickel SPLP Spreadsheet, provided within Appendix G, provides “SPLP Leachate Concentration”, “K_d”, “% Contaminant in Leachate”, and “Field leachate concentration values” that are three orders of magnitude different than those provided by CB&I via email on September 10, 2014. Please provide copies of the SPLP analysis laboratory report(s) to support these revised values. Also please provide documentation that the ARS has been accepted by NJDEP when received (in the Remedial Action Report, at a minimum).

Thank you.

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Subject: PPG- For Review- TEP- NGA Site 107

Greetings,

Arcadis has prepared a Technical Execution Plan on behalf of PPG, to outline the sequence of construction and the means and methods associated with the remedial actions planned for the Non-Garfield Avenue Group (NGA) Chromium Site 107 in Jersey City, Hudson County, New Jersey. A submittal summary sheet (SSS) is also included with this email with further details.

A comprehensive report including appendices is likely too large for some to receive via email. Therefore, the comprehensive report can be accessed via this [link](#).

Regards,
Jim McLaughlin

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