

# Appendix A-3

**NJDEP Approval of Alternative Remediation Standard for Impact to Groundwater - Nickel**

**Archived:** Friday, March 12, 2021 8:54:31 AM

**From:** [Overmyer, Jody](#)

**Sent:** Thu, 25 Apr 2019 15:18:09

**To:** [McLaughlin Jr., James \(ARCADIS\)](#)

**Cc:** [Feinberg, Richard \[C\]](#) [Terril, Mark](#)

**Subject:** FW: RE: PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

**Sensitivity:** Normal

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FYI

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**From:** Toppin, Swati <[Swati.Toppin@dep.nj.gov](mailto:Swati.Toppin@dep.nj.gov)>

**Sent:** Thursday, April 25, 2019 11:00 AM

**To:** Doyle, David; Overmyer, Jody

**Cc:** Toppin, Swati

**Subject:** <EXT>RE: PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

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As requested, a component review has been completed for the proposed Impact to Ground Water Soil Remediation Standard (IGWSRS) of 855 ppm for nickel. Providing the sampling is representative and the QA/QC acceptable, this proposed IGWSRS is acceptable.

Please note that the ARS form does not list a LSRP.

*Swati Toppin, Ph.D*

Research Scientist

NJDEP BEERA

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**From:** Doyle, David

**Sent:** Tuesday, April 23, 2019 4:07 PM

**To:** Toppin, Swati <[Swati.Toppin@dep.nj.gov](mailto:Swati.Toppin@dep.nj.gov)>

**Subject:** FW: PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

F I

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**From:** Doyle, David

**Sent:** Thursday, March 21, 2019 10:20 AM

**To:** Rivera, Rafael <[Rafael.Rivera@dep.nj.gov](mailto:Rafael.Rivera@dep.nj.gov)>

**Cc:** Schick, Kevin <[Kevin.Schick@dep.nj.gov](mailto:Kevin.Schick@dep.nj.gov)>; Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>; McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>

**Subject:** FW: PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

Rafael,

Please see attached application for BCAIN submittal and log-in purposes. The Alternative or New Remediation Standard and or Screening Level Application Form starts at page 179.

Thank you,  
Dave

David S. Doyle, Case Manager  
New Jersey Department of Environmental Protection  
Site Remediation and Waste Management Program  
Division of Remediation Management  
Remediation Oversight Element  
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**DEPARTMENT of  
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**From:** McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>  
**Sent:** Thursday, March 21, 2019 8:59 AM  
**To:** Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>; Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Cc:** Mastrocola, Krista <[Krista.Mastrocola@arcadis.com](mailto:Krista.Mastrocola@arcadis.com)>; Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com); Doyle, David <[David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)>; Costa, Ralph <[Ralph.Costa@WestonSolutions.com](mailto:Ralph.Costa@WestonSolutions.com)>  
**Subject:** [EXTERNAL] RE: PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

Prabal,

Thank you for your review and approval. Yes, it would be helpful if Dave Doyle could forward the attached *Alternative Remediation Standard for Impact to Groundwater- Nickel* package with signed Application Form to the appropriate person at BEERA.

Regards,  
Jim McLaughlin

**James S. McLaughlin, PG, CSP** | Certified Project Manager/Group Leader 3 | [James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)  
**Arcadis**

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**From:** Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>  
**Sent:** Thursday, March 21, 2019 8:50 AM  
**To:** McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>; Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Cc:** Mastrocola, Krista <[Krista.Mastrocola@arcadis.com](mailto:Krista.Mastrocola@arcadis.com)>; Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com); David Doyle ([David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)) <[David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)>; Costa, Ralph <[Ralph.Costa@WestonSolutions.com](mailto:Ralph.Costa@WestonSolutions.com)>  
**Subject:** RE: PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

Jim,

We have discussed the final memorandum below with NJDEP and it is acceptable. Dave Doyle mentioned that he could forward (via your email below) the *Alternative Remediation Standard for Impact to Groundwater- Nickel* package to the appropriate person at BEERA if you would like. Please let us know if you would like Dave Doyle to do so.

Thanks.  
Prabal

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**From:** McLaughlin Jr., James (ARCADIS) [<mailto:James.S.McLaughlin@arcadis.com>]  
**Sent:** Monday, March 4, 2019 7:53 PM  
**To:** Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>; Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Cc:** Mastrocola, Krista <[Krista.Mastrocola@arcadis.com](mailto:Krista.Mastrocola@arcadis.com)>; Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com); David Doyle ([David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)) <[David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)>; Costa, Ralph <[Ralph.Costa@WestonSolutions.com](mailto:Ralph.Costa@WestonSolutions.com)>  
**Subject:** PPG - Site 107- Nickel Exceedance and COPR Signature Memo\_107-010\_F

**\*\* External Email \*\***

Prabal,

Arcadis has prepared this Final *Nickel Exceedances in Fill Unrelated to CCPW Memo* for Non-Garfield Avenue Group (NGA) chromium Site 107 in Jersey City, Hudson County, New Jersey. This final memo incorporates response to reviewer's comments made during a teleconference on November 2, 2018.

Also attached is a *Alternative Remediation Standard for Impact to Groundwater- Nickel* package, which includes a signed Application Form.

Regards,  
Jim McLaughlin

**James S. McLaughlin, PG, CSP** | Certified Project Manager/Group Leader 3 | [James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)  
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**From:** Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>  
**Sent:** Friday, November 2, 2018 10:33 AM  
**To:** Mastrocola, Krista <[Krista.Mastrocola@arcadis.com](mailto:Krista.Mastrocola@arcadis.com)>; Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Cc:** McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>; Caballero, David <[David.Caballero@arcadis.com](mailto:David.Caballero@arcadis.com)>; Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com); David Doyle ([David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)) <[David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)>; Costa, Ralph <[Ralph.Costa@WestonSolutions.com](mailto:Ralph.Costa@WestonSolutions.com)>  
**Subject:** RE: PPG - For Review - Nickel Exceedance and COPR Signature

Hello Krista,

We agree with the conclusions provided in this memorandum. As we discussed on our conference call this morning with Arcadis and Rich Feinberg, we understand that you will be updating the memorandum to reflect recent work performed to establish a site-specific impact to groundwater soil remediation standard for nickel.

Thank you.

**Prabal N. Amin, P.E., LSRP**  
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Edison, NJ 08837

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Cell: 609-240-5289  
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---

**From:** Mastrocola, Krista [<mailto:Krista.Mastrocola@arcadis.com>]  
**Sent:** Tuesday, October 9, 2018 3:16 PM  
**To:** Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Cc:** McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>; Caballero, David <[David.Caballero@arcadis.com](mailto:David.Caballero@arcadis.com)>; Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com); Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>; David Doyle ([David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)) <[David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)>  
**Subject:** RE: PPG - For Review - Nickel Exceedance and COPR Signature

Hello Prabal and Laura,

Arcadis is submitting the attached Nickel Exceedance and COPR Signature memorandum for Site 107 Fashionland for Weston's review and comment.  
If you have any questions, please do not hesitate to reach out.

Thanks.  
-Krista

**Krista ankings Mastrocola PE** | Project Civil Engineer  
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**From:** Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Sent:** Wednesday, August 8, 2018 7:21 PM  
**To:** Mastrocola, Krista <[Krista.Mastrocola@arcadis.com](mailto:Krista.Mastrocola@arcadis.com)>  
**Cc:** McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>; Caballero, David <[David.Caballero@arcadis.com](mailto:David.Caballero@arcadis.com)>; Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com); Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>; David Doyle ([David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)) <[David.Doyle@dep.nj.gov](mailto:David.Doyle@dep.nj.gov)>  
**Subject:** RE: PPG - For Review - Nickel Exceedance and COPR Signature

Hello, Krista.

Weston reviewed the *Elevated Concentrations and COPR Signature, Site 107 Fashionland* memorandum, dated August 6, 2018, from J. McLaughlin and K. Mastrocola of Arcadis to P. Amin of Weston (Nickel Memo) and discussed our review with the Department. Overall, Weston and the Department concur that the elevated nickel concentrations do not appear to be related to CCPW; however, the Nickel Memo did not provide sufficient evidence to wholly support this conclusion.

Weston did not perform a detailed analysis of the statistics presented in the Nickel Memo due to the absence of data used for those statistics. The Department recommends that, in lieu of statistical analysis, PPG present lines of evidence similar to what was provided in the 4/15/13 memorandum from Thomas Gibbons of CB&I to Prabal Amin of Weston in the *Hudson County Chromium (HCC) Site 107 18 Chapel Avenue; Vanadium Exceedances in Fill Unrelated to CCPW Fill* memorandum (Vanadium Memo). Suggested lines of evidence could be provided in a brief memo/letter report, and would include:

- Identification of the specific area(s) for which Arcadis is requesting a determination of non-correlation of nickel exceedances with CCPW impacts;
- Analytical results of sample(s) for which Arcadis is requesting a determination of non-correlation of nickel exceedances with CCPW impacts (i.e., Cr<sup>+6</sup> and CCPW metals);
- Identification of the soil type(s) for which Arcadis is requesting a determination of non-correlation of nickel exceedances with CCPW impacts, supported by boring logs and descriptions of post-excavation sample soil textures;
- Cross section(s) for the area for which Arcadis is requesting a determination of non-correlation of nickel exceedances with CCPW impacts; and
- Aerial Photography/Historic Fill Mapping for the area for which Arcadis is requesting a determination of non-correlation of nickel exceedances with CCPW impacts.

Note that any presentation of statistical analysis would require an in-depth review of the statistics, including the entirety of the data set (e.g., Dresdner Robin-collected Remedial Investigation data, CB&I-collected Pre-Design Investigation data, Arcadis-collected post-excavation data) on which those statistics were based. This in-depth review could result in a delay in concurrence of the conclusions.

Regards,

*Laura*

Laura J. Amend-Babcock, P.E.  
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**From:** Mastrocola, Krista [<mailto:Krista.Mastrocola@arcadis.com>]  
**Sent:** Monday, August 6, 2018 9:31 AM  
**To:** Amin, Prabal <[Prabal.Amin@WestonSolutions.com](mailto:Prabal.Amin@WestonSolutions.com)>; Amend-Babcock, Laura <[Laura.Amend-Babcock@WestonSolutions.com](mailto:Laura.Amend-Babcock@WestonSolutions.com)>  
**Cc:** McLaughlin Jr., James (ARCADIS) <[James.S.McLaughlin@arcadis.com](mailto:James.S.McLaughlin@arcadis.com)>; Caballero, David <[David.Caballero@arcadis.com](mailto:David.Caballero@arcadis.com)>

Overmyer, Jody <[overmyer@ppg.com](mailto:overmyer@ppg.com)>; Feinberg, Richard [C] <[feinberg@ppg.com](mailto:feinberg@ppg.com)>; [Dorothy.Laguzza@leclairryan.com](mailto:Dorothy.Laguzza@leclairryan.com)

**Subject:** PPG - For Review - Nickel Exceedance and COPR Signature

**Importance:** High

Hello Prabal and Laura,

Arcadis is submitting the attached Nickel Exceedance and COPR Signature memorandum for Site 107 Fashionland for Weston's review and comment. Backfill in this area is being delayed until Weston's concurrence is received.

If you have any questions, please do not hesitate to reach out.

Thanks.

-Krista

**krista ankins astrocola** | Project Civil Engineer | [krista.mastrocola@arcadis.com](mailto:krista.mastrocola@arcadis.com)

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