

Appendix 9

Compliance Averaging Evaluation

MEMO

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Date:

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Subject:

Attainment of Remediation Standards – Antimony, Nickel, and Thallium
Non-Garfield Avenue Group Chromium Site 107

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INTRODUCTION

This memorandum provides documentation of attainment of soil sample compliance for antimony, nickel and thallium with the New Jersey Department of Environmental Protection (NJDEP) Residential Direct Contact Soil Remediation Standard (RDCSRS) and default Impact to Groundwater Soil Screening Level (IGWSSL) for Majority Site AOC-1A soil samples from Non-Garfield Avenue Group (NGA) Chromium Site 107 in Jersey City, Hudson County, New Jersey in accordance with the NJDEP *Technical Guidance for the Attainment of Remediation Standards and Site-Specific Criteria* (September 24, 2012, Version 1.0).

ANTIMONY

Evaluation of Remaining Soil Samples – Antimony

The RDCSRS for antimony is 31 milligrams per kilogram (mg/kg). The IGWSSL is 6 mg/kg. Post-excavation soil sampling analytical results were evaluated for exceedances of antimony as follows:

- No remaining soil samples exceeded the RDCSRS for antimony.
- One soil sample in the unsaturated zone exceeded the IGWSSL, sample BS-E11, where antimony was detected at 19.5 mg/kg. Compliance averaging was performed on this sample. The unsaturated zone includes samples with end elevation greater than or equal to 9.5 feet North American Vertical Datum of 1988 [NAVD88] as observed during Site 107 remedial excavation.
- Antimony was detected in exceedance of the IGWSSL in one additional soil sample (BS-F24 at 7.2 mg/kg). However, this soil sample is in the saturated zone, where delineation/remediation to the IGWSSL is inapplicable per the NJDEP requirements. Therefore, no additional evaluation was required for soil sample BS-F24.
- Antimony was reported with a reporting limit of 13 mg/kg (which is above the IGWSSL of 6 mg/kg) in soil sample BS-E23. However, this soil sample was reanalyzed, and antimony was below 1.4 mg/kg (below the IGWSSL). In addition, this soil sample was in the saturated zone. Therefore, no additional evaluation was required for soil sample BS-E23.
- Antimony had reporting limits of 8.6 and 8.0 mg/kg (which are above the IGWSSL of 6 mg/kg) in Remedial Investigation/Supplemental Investigation (RI/SI) soil samples DD003 (8.0-8.5) and DD004 (8.0-8.5), respectively. These two soil samples were in the unsaturated zone. If antimony were present, it would be expected to be co-located with hexavalent chromium (CrVI) or other Chromite Chemical Production Waste (CCPW) metals. Hexavalent chromium was not detected at concentrations greater than the chromium Soil Cleanup Criteria (CrSCC) in these samples, CCPW metals were not detected at concentrations greater than applicable RDCSRS or IGWSSL, and visual CCPW was not observed at these locations. In addition, antimony was not detected at concentrations greater than the IGWSSL at nearby samples collected at similar elevations: BS-I5A, BS-J5, or BS-K5. Additionally, laboratory report JB52631 states that the antimony detection limits for both samples were elevated due to dilution required for high interfering element. Although these lines of evidence indicate that antimony does not exceed the IGWSSL at DD003 and DD004, these two soil samples have been included in the compliance averaging evaluation for antimony in the unsaturated zone.

Compliance Averaging – Antimony

The NJDEP guidance document entitled *Technical Guidance for the Attainment of Remediation Standards and Site-Specific Criteria* dated September 24, 2012 (Guidance), was used to determine the applicable compliance averaging option. The 75 percent/10 times procedure was used to demonstrate compliance with the IGWSSL within the AOC-1A soil excavation, shown on Figure E-1 (as the limit of Site 107 excavation). According to the Guidance, the 75 percent/10 times procedure can be used for the impact to ground water exposure pathway after a remedial action has been conducted.

Area of Concern

The AOC-1A excavation is depicted on Figure E-1. It includes all soil samples analyzed for antimony within the unsaturated zone (sample end elevation greater than or equal to 9.5 feet NAVD88), and encompasses soil samples BS-E11, DD003, and DD004.

Number of Soil Samples within AOC-1A

The excavated volume of soil within the unsaturated zone at AOC-1A was 49,077 cubic yards.

The number of post-excavation/remaining unsaturated soil samples analyzed for antimony within AOC-1A is 198 soil samples. The Guidance requires eight post-remedial samples for up to 125 cubic yards of excavated soil, 12 soil samples for up to 3,000 cubic yards of excavated soil, and 12 additional soil samples for up to 3,000 cubic yards of excavated soil thereafter. For the 49,077 cubic yards of soil, 196 soil samples are required.

A review of the 2013 Remedial Investigation Report (RIR) prepared by Dresdner Robin, indicates that exceedances of antimony above the IGWSSL were detected at varying soil sampling depths from the surface down to 12.5 feet below grade (Figure 10 of the 2013 RIR included in Attachment 1). Therefore, using all soil samples analyzed for antimony within the unsaturated zone is representative of the zone of impact prior to excavation.

Soil Sampling Results Evaluation

Table E-1 presents a summary of the antimony soil sampling analytical results within the Majority Site AOC-1A unsaturated zone and evaluates the results against the 75 percent/10 times procedure. As depicted in Table E-1, antimony is not detected above 60 mg/kg (10 times the IGWSSL of 6 mg/kg) in any of the remaining soil samples within the unsaturated zone at AOC-1A. Antimony was detected below the IGWSSL of 6 mg/kg in 195 out of the 198 soil samples; thus, 98% of the samples are below the IGWSSL.

Based on the above, both requirements for the 75 percent/10 times are met for antimony within AOC-1A. This indicates that no additional remedial action is required for antimony in the unsaturated zone when the impact to groundwater pathway is considered.

NICKEL

Evaluation of Remaining Soil Samples – Nickel

The RDCSRS for nickel is 1,600 mg/kg. The Site-Specific IGWSRS (SS IGWSRS) for nickel is 855 mg/kg. Post excavation soil sampling analytical results were evaluated for exceedances of nickel as follows:

- Two soil samples exceeded the RDCSRS – soil sample BS-E23, where nickel was detected at 3,700 mg/kg, and soil sample BS-F24, where nickel was detected at 7,520 mg/kg. Compliance averaging was performed on these samples.
- No soil samples in the unsaturated zone exceeded the SS IGWSRS for nickel.

Nickel was detected in exceedance of the SS IGWSSL in three saturated zone soil samples where delineation/remediation to the SS IGWSRS is inapplicable per the NJDEP requirements:

- Soil sample BS-E23 discussed above, where nickel was detected at 3,700 mg/kg.
- Soil sample BS-F24 discussed above, where nickel was detected at 7,520 mg/kg.

- Soil sample BS-G29, where nickel was detected at 1,550 mg/kg.

Compliance Averaging – Nickel

The NJDEP Guidance was used to determine the applicable compliance averaging option. Compliance averaging using the spatially weighted average was used to demonstrate compliance with the RDCSRS at post-excavation soil sampling locations BS-E23 and BS-F24. According to the Guidance, spatially weighted average can be used for the soil ingestion-dermal exposure pathway.

Functional Area

The functional area is depicted on Figure E-2. It encompasses soil samples BS-E23 and BS-F24. Nickel in all soil samples within the functional area (excluding BS-E23 and BS-F24) was below the RDCSRS of 1,600 mg/kg.

The size of the functional area is 10,859.42 square feet or 0.25 acres, which satisfies the Guidance requirements for the ingestion-dermal residential exposure pathway (nickel's RDCSRS is based on the ingestion-dermal pathway).

Vertically, the Guidance requires the designation of a surface zone (upper two feet), and a subsurface zone (greater than two feet). There are no remaining nickel impacts within the surface zone. The two soil samples where nickel exceeded the RDCSRS (BS-E23 and BS-F-24) were collected from a depth of 15.8 to 16.3 feet below ground surface (bgs), and 14.7 to 15.2 feet bgs, respectively. Therefore, only the subsurface zone has been considered herein.

Number of Soil Samples within Functional Area

The functional area includes 17 soil samples, and 17 Thiessen Polygons. Table E-2 presents the spatially weighted average calculation for nickel within the functional area. The spatially weighted average of nickel within the functional area is 829.8 mg/kg, which is below the RDCSRS for nickel. This indicates that no additional remedial action is required for nickel.

In addition, the two soil samples exceeding RDCSRS (BS-E23 and BS-F24) are approximately 100 feet southwest of the area defined as the "Nickel Only Area" (Figure 3b of the RAR), and apparently from the same non-PPG fill source. As described in the *Nickel Exceedances in Fill Unrelated to CCPW* memo (Arcadis 2019), approved by NJDEP on March 21, 2019, material within the Nickel Only Area at depths greater than 11.0 to 12.0 NAVD88 is separate from the CCPW-impacted fill that PPG is responsible for remediating. Samples collected within the Nickel-Only Area exhibited an arithmetic mean nickel concentration of 705.2 mg/kg, and a maximum nickel concentration of 12,600 mg/kg, with corresponding non-detect hexavalent chromium (CrVI). Samples BS-E23 (elevation 4.7 to 4.2 NAVD88) and BS-F24 (elevation 4.9 to 4.4 NAVD88) were collected at elevations corresponding to the Nickel-Only Area material, nickel detections are within the concentration range observed in the Nickel-Only Area samples, exhibited a lack of visual CCPW, and corresponding CrVI was non-detect at both locations.

THALLIUM

Evaluation of Remaining Soil Samples – Thallium

The IGWSSL for thallium is 3 mg/kg. Post-excavation soil sampling analytical results were evaluated for exceedances of thallium as follows:

- Exceedances above the IGWSSL within the unsaturated zone (sample end elevation greater than or equal to 9.5 feet NAVD88): no soil sample concentrations above laboratory reporting limits in the unsaturated zone exceeded the IGWSSL.
- Thallium was reported with a reporting limit ranging from 4.0 mg/kg to 6.1 mg/kg (which are above the IGWSSL of 3 mg/kg) in five soil samples collected in the unsaturated zone: BS-E13D, ID002, DD003, DD004, and SW-D3 (6.0-6.5)A. If thallium were present in these samples, it would be expected to be co-located with CrVI or other CCPW metals. Hexavalent chromium was not detected at concentrations greater than the CrSCC, CCPW metals were not detected at concentrations greater than applicable RDCSRS or IGWSSL in these samples, and visual CCPW was not observed at these locations. In addition, thallium was not detected at concentrations greater than the IGWSSL at any sample onsite in both the saturated and unsaturated zones. Additionally, laboratory reports state that the thallium detection limits for all five samples were elevated due to dilution required for high interfering element. Based on these lines of evidence, there is no indication that thallium remains in place at concentrations greater than the IGWSSL.
- Thallium was reported with a reporting limit ranging from 3.1 mg/kg to 6.2 mg/kg (which are above the IGWSSL of 3 mg/kg) in four soil samples BS-D23, BS-I18, BS-I19, and BS-K11. However, these soil samples were reanalyzed, and thallium was below the IGWSSL. In addition, these soil samples were in the saturated zone. Therefore, no additional evaluation was required for these four soil samples.

CONCLUSION

Compliance averaging was conducted on post-excavation soil samples exceeding applicable antimony and nickel screening levels in accordance with NJDEP's *Technical Guidance for the Attainment of Remediation Standards and Site-Specific Criteria* dated September 24, 2012. Compliance was demonstrated for all samples remaining on-site which exceed applicable RDCSRS and/or IGWSSL.

Enclosures:

Table E-1: Compliance Averaging Evaluation – Antimony

Table E-2: Compliance Averaging Evaluation – Nickel

Figure E-1: Soil AOC-1A – Antimony Exceedances in Remaining Vadose Zone Soil Samples

Figure E-2: Functional Area and Thiessen Polygons – Nickel Exceedances in Post-Excavation Soil Samples

Attachment 1: Figure 10 of the 2013 RIR

Table E-1
Compliance Averaging Evaluation - Antimony
Site 107
18 Chapel Avenue
Jersey City, New Jersey

Sample ID	Sample Start Elevation (NAVD 88)	Sample End Elevation (NAVD 88)	Sample Start Depth (feet bgs)	Sample End Depth (feet bgs)	Antimony (mg/kg)
107_M034	11.4	10.9	7.5	8.0	< 2.2 U
BS-A6T	12.9	12.4	7.7	8.2	< 2.3 U
BS-A7T	14.6	14.1	6.1	6.6	< 2.4 U
BS-B10	14.9	14.4	6.1	6.6	< 2.5 U
LD003	12.5	12.0	6.5	7.0	< 1.9 U
LD003	11.5	11.0	7.5	8.0	< 1.1 U
LD003	10.5	10.0	8.5	9.0	< 1.1 U
BS-B12	14.0	13.5	6.9	7.4	< 2.5 U
BS-B12D	12.0	11.5	8.7	9.2	< 2.3 U
LD004	11.0	10.5	8.0	8.5	< 1.9 U
LD004	10.0	9.5	9.0	9.5	< 2.0 U
LD005	10.5	10.0	8.5	9.0	< 1.0 U
BS-B14	11.3	10.8	9.4	9.9	< 2.2 U
BS-B15	11.2	10.7	9.6	10.1	< 2.4 U
BS-B16	11.1	10.6	9.6	10.1	< 2.5 U
BS-B5A	12.5	12.0	8.2	8.7	< 2.3 U
BS-B6	15.3	14.8	5.4	5.9	< 2.4 U
BS-B6E	12.8	12.3	7.9	8.4	< 2.4 U
BS-B7	15.7	15.2	5.0	5.5	< 2.3 U
BS-B8	15.3	14.8	5.4	5.9	< 2.5 U
BS-B9	14.7	14.2	6.1	6.6	< 2.6 U
BS-C10A	14.1	13.6	6.7	7.2	< 2.4 U
KD004	12.0	11.5	7.0	7.5	< 1.8 U
KD004	11.0	10.5	8.0	8.5	< 4.7 U
KD004	10.0	9.5	9.0	9.5	< 4.2 U
BS-C11	13.5	13.0	7.2	7.7	< 2.7 UJ-
BS-C12	12.4	11.9	8.3	8.8	< 2.4 UJ-
BS-C12	12.4	11.9	8.3	8.8	< 2.3 UJ-
BS-C13	10.5	10.0	10.1	10.6	< 2.7 U
BS-C15	10.1	9.6	10.6	11.1	4.2
KD001	12.5	12.0	6.5	7.0	< 0.99 U
KD001	11.5	11.0	7.5	8.0	< 4.9 U
KD001	10.5	10.0	8.5	9.0	< 3.8 U
BS-C6	14.4	13.9	6.2	6.7	< 2.4 U
KD002	12.5	12.0	6.5	7.0	< 1.8 U
KD002	11.5	11.0	7.5	8.0	< 1.9 U
BS-C7E	14.3	13.8	6.4	6.9	< 2.5 U
BS-C8E	13.7	13.2	7.0	7.5	< 2.4 U
BS-C9E	13.1	12.6	7.8	8.3	< 2.7 U
BS-D10	13.6	13.1	7.1	7.6	< 4.0 U
JD002	12.0	11.5	7.0	7.5	< 0.95 U
BS-D11	14.1	13.6	6.6	7.1	3.7 J-
BS-D25	11.6	11.1	9.3	9.8	< 2.3 UJ-
BS-D5	14.6	14.1	6.2	6.7	< 2.1 U

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Sample ID	Sample Start Elevation (NAVD 88)	Sample End Elevation (NAVD 88)	Sample Start Depth (feet bgs)	Sample End Depth (feet bgs)	Antimony (mg/kg)
BS-D7	15.5	15.0	5.2	5.7	< 2.5 U
BS-D8	15.6	15.1	5.1	5.6	< 2.6 UJ-
BS-D8	15.6	15.1	5.1	5.6	< 2.4 UJ-
BS-D9	13.7	13.2	7.1	7.6	< 2.5 U
BS-E10	13.8	13.3	7.0	7.5	< 2.4 U
ID005	12.5	12.0	6.5	7.0	< 2.1 U
ID005	11.5	11.0	7.5	8.0	< 0.90 U
ID005	10.5	10.0	8.5	9.0	< 0.90 U
BS-E11	14.5	14.0	6.2	6.7	19.5 J-
BS-E11D	10.0	9.5	10.6	11.1	< 2.5 UJ-
107_M028E2	13.3	12.8	5.6	6.1	< 2.3 U
107_M028W	13.4	12.9	6.9	7.4	< 2.5 UJ-
108_M018_C	13.5	13.0	7.2	7.7	< 2.5 U
BS-A10T	14.1	13.6	6.9	7.4	< 2.6 U
BS-A11T	14.5	14.0	6.6	7.1	< 2.4 U
BS-A12T	13.4	12.9	7.3	7.8	< 2.4 U
BS-A8T	14.9	14.4	5.9	6.4	< 2.4 U
BS-A9V	12.5	12.0	8.3	8.8	< 2.4 U
BS-E25	11.7	11.2	8.7	9.2	< 2.3 UJ-
BS-E25	11.7	11.2	8.7	9.2	< 2.3 UJ-
BS-E26	11.6	11.1	8.6	9.1	< 2.5 UJ-
BS-E31	10.2	9.7	9.1	9.6	< 2.4 U
BS-E5	14.6	14.1	6.2	6.7	< 2.1 U
ID001	13.0	12.5	6.0	6.5	< 4.9 U
ID001	12.0	11.5	7.0	7.5	< 4.8 U
ID001	11.0	10.5	8.0	8.5	< 4.6 U
BS-E6	15.1	14.6	5.7	6.2	< 2.2 U
ID002	13.5	13.0	5.5	6.0	< 4.5 U
ID002	12.5	12.0	6.5	7.0	< 4.9 U
ID002	11.5	11.0	7.5	8.0	< 5.5 U
ID002	10.5	10.0	8.5	9.0	< 4.8 U
BS-E8	15.6	15.1	5.1	5.6	< 2.5 UJ-
BS-E8	15.6	15.1	5.1	5.6	< 2.3 UJ-
BS-E9	14.9	14.4	5.9	6.4	< 2.4 U
BS-G10A	11.7	11.2	9.0	9.5	< 2.3 UJ-
BS-F10A	11.6	11.1	9.2	9.7	< 2.5 U
BS-G12	10.6	10.1	10.1	10.6	< 2.2 UJ-
ID006	11.0	10.5	8.0	8.5	< 1.1 U
BS-F25	10.8	10.3	8.7	9.2	< 2.5 UJ-
BS-F26	10.8	10.3	8.2	8.7	< 2.3 UJ-
BS-F27	11.4	10.9	7.4	7.9	< 2.4 UJ-
BS-F28	10.4	9.9	8.1	8.6	< 2.4 U
BS-F30	10.3	9.8	8.3	8.8	< 2.3 U
BS-F5	14.7	14.2	6.1	6.6	< 2.3 U

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18 Chapel Avenue
Jersey City, New Jersey

Sample ID	Sample Start Elevation (NAVD 88)	Sample End Elevation (NAVD 88)	Sample Start Depth (feet bgs)	Sample End Depth (feet bgs)	Antimony (mg/kg)
GI001	13.0	12.5	6.0	6.5	< 3.7 U
GI001	12.0	11.5	7.0	7.5	< 5.3 U
GI001	11.0	10.5	8.0	8.5	< 4.3 U
BS-F6	15.5	15.0	5.3	5.8	< 2.4 U
BS-H11	11.8	11.3	8.9	9.4	< 2.3 UJ-
BS-F7	15.6	15.1	5.2	5.7	< 2.2 U
BS-F8	15.8	15.3	5.0	5.5	< 2.4 U
BS-F9	15.1	14.6	5.6	6.1	< 2.3 U
BS-H12	10.4	9.9	10.2	10.7	< 2.3 UJ-
BS-G10A	11.7	11.2	9.0	9.5	< 2.3 U
BS-G11A	11.9	11.4	8.8	9.3	< 2.4 U
BS-G12	10.6	10.1	10.1	10.6	< 2.6 UJ-
BS-G12	10.6	10.1	10.1	10.6	< 2.5 UJ-
BS-G5	15.0	14.5	5.7	6.2	< 2.2 U
BS-G5T	14.0	13.5	6.9	7.4	< 2.4 U
FI001	10.0	9.5	8.0	8.5	< 4.5 U
BS-G6A	12.5	12.0	8.4	8.9	< 2.2 U
BS-G7A	14.5	14.0	6.4	6.9	< 2.3 U
BS-G8	15.0	14.5	5.9	6.4	< 2.4 U
BS-G9	14.5	14.0	6.3	6.8	< 2.7 U
BS-G9	14.5	14.0	6.3	6.8	< 2.6 U
BS-H10A	12.0	11.5	8.7	9.2	< 2.4 U
BS-H11	11.8	11.3	8.9	9.4	< 2.3 U
BS-H11D	10.0	9.5	10.6	11.1	< 2.4 UJ-
BS-H12	10.4	9.9	10.2	10.7	< 2.6 UJ-
BS-H5	13.9	13.4	3.3	3.8	< 2.2 UJ-
BS-H5T	12.0	11.5	4.9	5.4	< 2.4 U
FI002	14.0	13.5	4.0	4.5	< 4.1 U
FI002	12.0	11.5	6.0	6.5	< 4.1 U
FI002	10.0	9.5	8.0	8.5	< 3.8 U
BS-H6	15.4	14.9	2.0	2.5	< 2.2 UJ-
BS-H6T	11.8	11.3	7.8	8.3	< 2.9 U
BS-H6TT	11.9	11.4	9.0	9.5	< 2.4 U
BS-H8	14.8	14.3	6.1	6.6	< 2.5 U
BS-H9	14.2	13.7	6.7	7.2	< 2.3 U
SW-A60 (6.0-6.5)	12.8	12.3	5.1	5.6	< 2.5 U
SW-A61 (6.0 - 6.5)	13.7	13.2	6.9	7.4	< 2.3 U
BS-E30 (8.0-8.5)A	11.0	10.5	8.5	9.0	< 2.3 UJ-
BS-I5A	11.4	10.9	5.7	6.2	< 2.3 U
BS-I5T	11.8	11.3	5.6	6.1	< 2.4 U
BS-I6A	12.7	12.2	4.4	4.9	< 2.2 UJ-
BS-I6T	11.4	10.9	8.1	8.6	< 3.0 U
BS-I7A	13.2	12.7	6.5	7.0	< 2.5 UJ-
BS-I8A	12.7	12.2	5.9	6.4	< 4.6 UJ-

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Site 107
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Sample ID	Sample Start Elevation (NAVD 88)	Sample End Elevation (NAVD 88)	Sample Start Depth (feet bgs)	Sample End Depth (feet bgs)	Antimony (mg/kg)
BS-I9S	13.4	12.9	7.4	7.9	< 2.6 U
BS-J5	13.2	12.7	4.7	5.2	< 2.1 UJ-
DD003	12.0	11.5	6.0	6.5	< 0.91 U
DD003	10.0	9.5	8.0	8.5	< 8.6 U
DD004	12.0	11.5	6.0	6.5	< 0.96 U
DD004	10.0	9.5	8.0	8.5	< 8.0 U
BS-J6	12.5	12.0	5.4	5.9	< 2.5 UJ-
BS-J6T	10.0	9.5	7.9	8.4	< 2.3 U
107_D021	11.5	11.0	6.5	7.0	< 2.4 U
BS-J7	13.2	12.7	4.8	5.3	< 2.5 UJ-
BS-J7T	10.2	9.7	8.0	8.5	< 2.6 UJ-
BS-J8A	12.7	12.2	5.4	5.9	< 2.3 UJ-
BS-K5	11.4	10.9	6.5	7.0	< 2.4 U
BS-K5T	10.9	10.4	7.1	7.6	< 2.6 U
BS-K6	12.8	12.3	5.1	5.6	< 2.4 UJ-
BS-K6T	11.7	11.2	6.2	6.7	< 2.5 UJ-
BS-K7	13.0	12.5	4.9	5.4	< 2.5 UJ-
BS-K7T	11.8	11.3	6.0	6.5	< 2.6 UJ-
BS-K8A	11.3	10.8	6.7	7.2	< 2.4 UJ-
SW-D1 (10.0-10.5)	10.4	9.9	10.1	10.6	< 2.5 UJ-
SW-D1 (8.0-8.5)	12.4	11.9	8.2	8.7	< 2.2 UJ-
SW-D11 (8.0-8.5)	11.9	11.4	8.5	9.0	< 3.0 UJ-
SW-D13 (8.0-8.5)	10.9	10.4	8.6	9.1	< 2.4 UJ-
SW-D2 (10.0-10.5)A	10.4	9.9	9.8	10.3	< 2.4 UJ-
SW-D1 (0.0-0.5)	20.3	19.8	0.5	1.0	< 2.1 UJ-
SW-D2 (8.0-8.5)A	12.3	11.8	8.0	8.5	< 2.4 UJ-
SW-D1 (2.0-2.5)	18.4	17.9	2.3	2.8	< 2.3 UJ-
SW-D3 (10.0-10.5)A	10.1	9.6	9.7	10.2	< 2.5 UJ-
SW-D1 (4.0-4.5)	16.4	15.9	4.2	4.7	< 2.3 UJ-
SW-D1 (6.0-6.5)	14.5	14.0	6.2	6.7	< 2.3 UJ-
SW-D11 (0.0-0.5)	19.9	19.4	0.7	1.2	< 2.2 UJ-
SW-D3 (8.0-8.5)A	12.1	11.6	7.9	8.4	< 2.4 UJ-
SW-D11 (2.0-2.5)	17.9	17.4	2.6	3.1	< 2.2 UJ-
SW-D4 (10.0-10.5)A	10.0	9.5	9.8	10.3	< 2.4 U
SW-D11 (4.0-4.5)	15.9	15.4	4.6	5.1	< 2.3 UJ-
SW-D11 (6.0-6.5)	13.9	13.4	6.5	7.0	< 2.2 UJ-
SW-D12 (2.2-2.7)	17.9	17.4	2.8	3.3	< 2.2 U
SW-D4 (8.0-8.5)A	11.9	11.4	8.0	8.5	< 2.4 U
SW-D12 (4.0-4.5)	16.6	16.1	4.1	4.6	< 2.2 U
SW-D12 (6.0-6.5)	14.7	14.2	6.0	6.5	< 2.2 U
SW-D5 (8.0-8.5)	10.9	10.4	8.9	9.4	< 2.4 UJ-
SW-D13 (0.0-0.5)	18.9	18.4	0.8	1.3	< 2.3 UJ-
SW-D8 (8.0-8.5)	10.1	9.6	8.8	9.3	< 2.3 U
SW-D9 (8.0-8.5)	10.2	9.7	8.8	9.3	< 2.3 UJ-

Table E-1
Compliance Averaging Evaluation - Antimony
Site 107
18 Chapel Avenue
Jersey City, New Jersey

Sample ID	Sample Start Elevation (NAVD 88)	Sample End Elevation (NAVD 88)	Sample Start Depth (feet bgs)	Sample End Depth (feet bgs)	Antimony (mg/kg)
107_M028W	13.4	12.9	6.9	7.4	< 2.4 UJ-
SW-D13 (2.0-2.5)	16.8	16.3	2.8	3.3	< 2.4 UJ-
SW-D13 (4.0-4.5)	14.9	14.4	4.7	5.2	< 2.3 UJ-
SW-D13 (6.0-6.5)	12.9	12.4	6.7	7.2	< 2.4 UJ-
SW-D2 (0.0-0.5)A	20.1	19.6	0.3	0.8	< 2.2 UJ-
SW-D2 (2.0-2.5)A	18.3	17.8	2.1	2.6	< 2.4 UJ-
SW-D2 (4.0-4.5)A	16.3	15.8	4.0	4.5	< 2.3 UJ-
SW-D2 (6.0-6.5)A	14.3	13.8	6.0	6.5	< 2.4 UJ-
SW-D3 (0.0-0.5)A	20.1	19.6	9.7	10.2	< 2.1 UJ-
SW-D3 (2.0-2.5)A	18.1	17.6	2.3	2.8	< 2.4 UJ-
SW-D3 (4.0-4.5)A	16.1	15.6	4.1	4.6	< 2.2 UJ-
SW-D3 (6.0-6.5)A	14.1	13.6	6.0	6.5	< 2.3 UJ-
SW-D4 (0.0-0.5)A	19.9	19.4	0.4	0.9	< 2.4 U
SW-D4 (2.0-2.5)A	17.8	17.3	2.3	2.8	< 2.1 U
SW-D4 (4.0-4.5)A	15.9	15.4	4.2	4.7	< 2.3 U
SW-D4 (6.0-6.5)A	13.8	13.3	6.2	6.7	< 2.2 U
SW-D5 (4.0-4.5)	14.6	14.1	5.1	5.6	< 2.3 UJ-
SW-D5 (6.0-6.5)	12.9	12.4	6.9	7.4	< 2.4 UJ-
SW-D6 (6.0-6.5)	11.1	10.6	8.2	8.7	< 2.5 UJ-
SW-D13 (8.0-8.5)	10.9	10.4	8.6	9.1	< 2.4 UJ-
SW-D3 (10.0-10.5)A	10.1	9.6	9.7	10.2	< 2.6 UJ-
SW-D6 (6.0-6.5)	11.1	10.6	8.2	8.7	< 2.3 UJ-

Total number of soil samples within the Area of Concern (the excavated area within the unsaturated zone)	198	
Volume of unsaturated soil that was excavated within the Area of Concern	49,077	cubic yards
Number of soil samples below the IGWSSL of 6 mg/kg	195	
Percentage of samples below the IGWSSL	98%	
Number of samples greater than 10 times the IGWSSL	0	

More than 75% of the samples are below the IGWSSL, and no samples are above 10 times the IGWSSL; therefore, compliance averaging using the 75%/10x methodology indicates no additional remedial action is required for antimony for the impact to groundwater pathway at BS-E11, DD003 and DD004.

Notes:

bgs: below ground surface

mg/kg: milligrams per kilogram

IGWSSL: Impact to Groundwater Soil Screening Level

19.5

< 8.6 U

Antimony's concentration is above the IGWSSL of 6 mg/kg

Antimony was analyzed for but not detected. The associated value is the analyte instrument detection limit, which is greater than antimony's IGWSSL of 6 mg/kg

The analyte was analyzed for but not detected. The associated value is the analyte instrument

U: detection limit

J-: The result is an estimated quantity, but the result may be biased low

Table E-2
Compliance Averaging Evaluation - Nickel
Site 107
18 Chapel Avenue
Jersey City, New Jersey



Points for Thiessen Polygon - Direct Contact Pathway (Subsurface Zone)							
Sample ID	Sample Start Elevation (NAVD 88)	Sample End Elevation (NAVD 88)	Sample Start Depth (feet bgs)	Sample End Depth (feet bgs)	Nickel (mg/kg)	Area (sq. ft)	Area * Concentration
107_I038	3.3	2.8	17.0	17.5	834	301.32	251,303
BS-D22	4.3	3.8	16.5	17.0	11.5	473.33	5,443
BS-D23	5.3	4.8	15.7	16.2	65.1	801.27	52,163
BS-D24	5.4	4.9	15.5	16.0	33.2	588.14	19,526
BS-D25	11.6	11.1	9.3	9.8	61.6	488.78	30,109
BS-E22	3.5	3.0	16.8	17.3	7.5	731.71	5,488
BS-E23	4.7	4.2	15.8	16.3	3,700	644.33	2,384,030
BS-E24	5.1	4.6	15.4	15.9	217	527.96	114,567
BS-E25	11.7	11.2	8.7	9.2	54.7	620.15	33,922
BS-F22	2.5	2.0	17.5	18.0	23.4	878.99	20,568
BS-F23	4.4	3.9	15.1	15.6	209	809.33	169,151
BS-F24	4.9	4.4	14.7	15.2	7,520	768.45	5,778,778
BS-F25	10.8	10.3	8.7	9.2	36.4	580.24	21,121
BS-G22	5.9	5.4	12.9	13.4	85.3	640.17	54,606
BS-G23	5.6	5.1	13.0	13.5	61.2	764.38	46,780
BS-G24	5.3	4.8	13.1	13.6	16.2	705.11	11,423
BS-G25	5.3	4.8	12.9	13.4	22.1	535.77	11,840
Total						10,859.42	9,010,818
Area-Weighted Average (mg/kg) = (Sum of Area*Concentration)/(Total Area)						829.8	
Conclusion						No Remediation Required	

The Area-Weighted Average represents the average nickel concentration, which is less than the RDCSRS of 1,600 mg/kg; therefore, compliance averaging using the spatially weighted average indicates that no additional remedial action is required for nickel at BS-E23 and BS-F24

Notes:

bgs: below ground surface

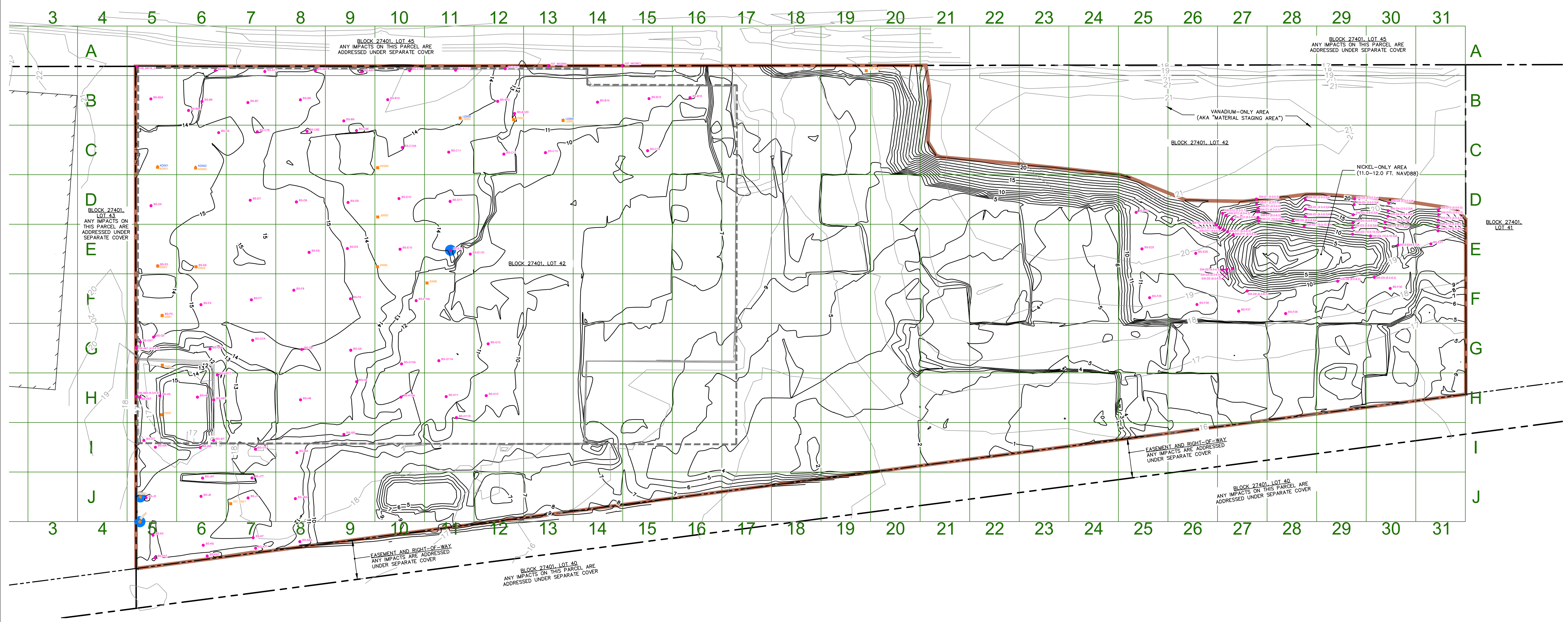
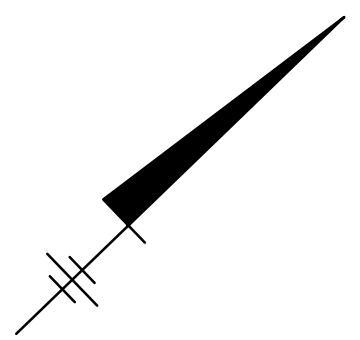
mg/kg: milligrams per kilogram

sq. ft: square feet

RDCSRS: Residential Direct Contact Soil Remediation Standard

7,520 Nickel concentration is above the RDCSRS of 1,600 mg/kg

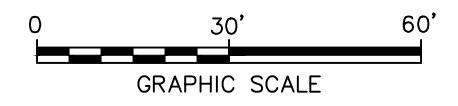
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 PLOTTED: 10/22/2021 9:12 AM BY: STEINBERGER, GEORGE
 XREFS: IMAGES: PROJECTNAME: GEN-X-TITLE



LEGEND:

	POST-EXCAVATION SOIL SAMPLE LOCATION
	RI/SI SAMPLE USED AS POST-EX SAMPLE
	REMAINING RI/SI SAMPLE LOCATION
	SAMPLES WITH ANTIMONY EXCEEDANCE ABOVE THE IMPACT TO GROUNDWATER SOIL SCREENING LEVEL
	PRE-EXCAVATION GROUND SURFACE ELEVATION (1-FT INTERVAL NAVD-88)
	AS-BUILT EXCAVATION ELEVATION (1-FT INTERVAL IN NAVD-88)
	LIMITS OF SITE 107 EXCAVATION
	FORMER BUILDING
	EXCAVATION GRID
	PROPERTY BOUNDARY

- NOTES:**
- ELEVATION VERTICAL DATUM IS NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88), IN US SURVEY FEET.
 - EXCAVATION ELEVATION CONTOURS FROM POST EXCAVATION SURVEY BY MASER CONSULTING, FILENAME V-POST-EX.DWG, DATED 8/13/2020.
 - LOT/BLOCK INFORMATION FROM CITY OF JERSEY CITY TAX MAP, SHEET 274, DATED AUGUST 2006 AT A SCALE OF 1" = 200'.
 - PRE-REMEDATION ELEVATION CONTOURS FROM ENTACT, DRAWING FILE "PPG Site 107_PRE TOPO Surf_3.20.19.dwg" DATED 11/14/2018.

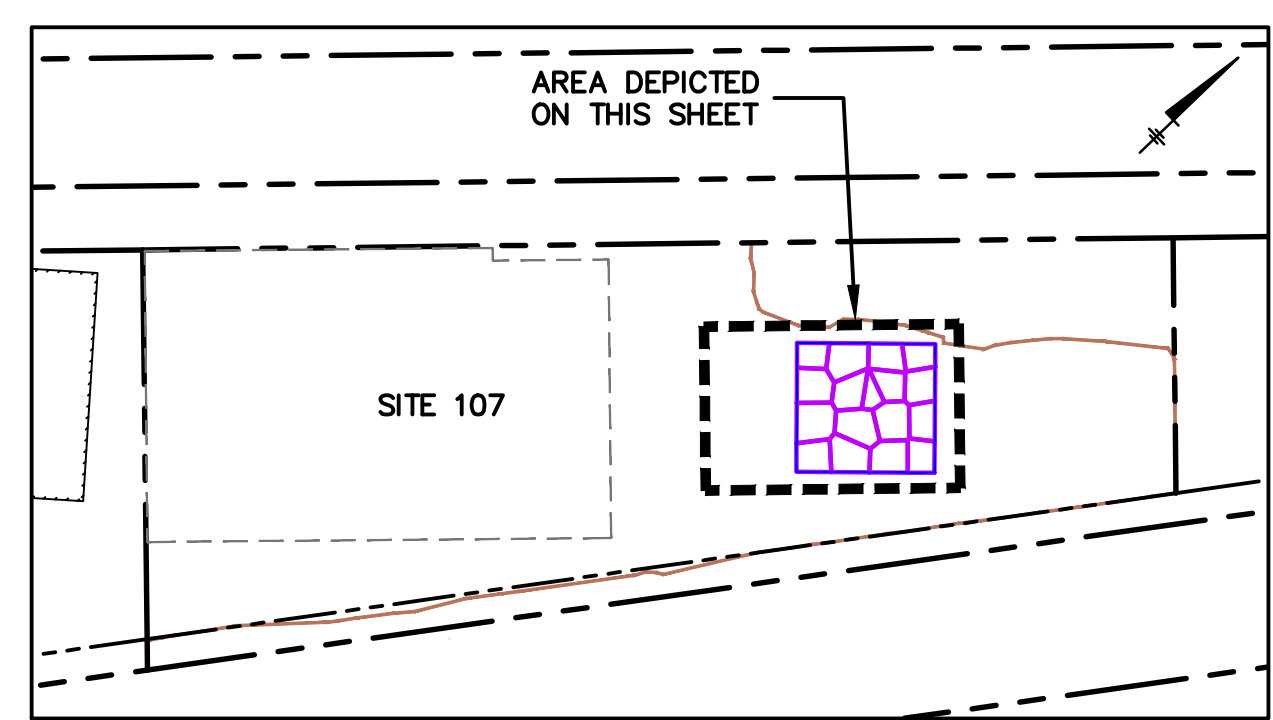
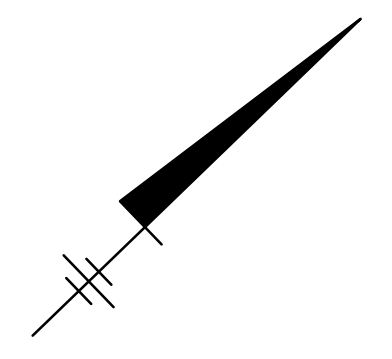


PPG
 18 CHAPEL AVENUE, JERSEY CITY, NEW JERSEY

**SOIL AOC-1A- ANTIMONY
 EXCEEDANCES IN REMAINING VADOSE
 ZONE SOIL SAMPLES**

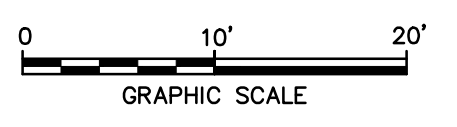
ARCADIS

FIGURE
E-1



KEY MAP
NOT TO SCALE

- LEGEND:**
- POST-EXCAVATION SOIL SAMPLE LOCATION
 - ▲ RI/SI SAMPLE USED AS POST-EX SAMPLE
 - REMAINING RI/SI SAMPLE LOCATION
 - SAMPLES WITH NICKEL EXCEEDANCE ABOVE THE RESIDENTIAL DIRECT CONTACT SOIL REMEDIATION STANDARD
 - 15— PRE-EXCAVATION GROUND SURFACE ELEVATION (1-FT INTERVAL NAVD-88)
 - 16— AS-BUILT EXCAVATION ELEVATION (1-FT INTERVAL IN NAVD-88)
 - — LIMITS OF SITE 107 EXCAVATION
 - - - - FUNCTIONAL AREA
 - — THIESSEN POLYGON NETWORK



PPG
18 CHAPEL AVENUE, JERSEY CITY, NEW JERSEY

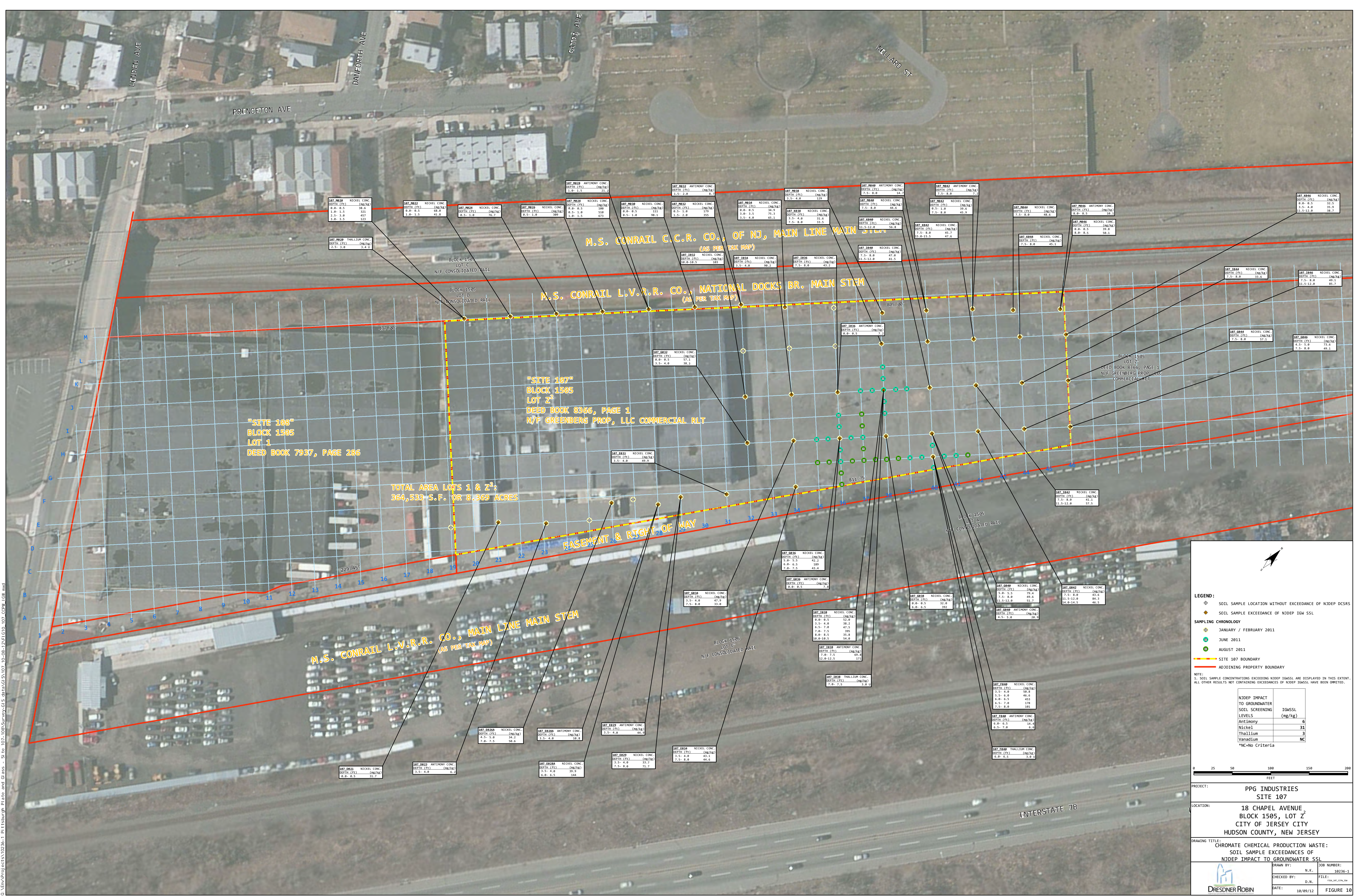
**FUNCTIONAL AREA AND THIESSEN
POLYGONS - NICKEL EXCEEDANCES IN
POST-EXCAVATION SOIL SAMPLES**

ARCADIS

FIGURE
E-2

Attachment 1

Figure 10 of the 2013 RIR



"SITE 108"
BLOCK 1505
LOT 1
DEED BOOK 7937, PAGE 286

"SITE 107"
BLOCK 1505
LOT Z
DEED BOOK 8366, PAGE 1
N/Y GREENBERG PROP, LLC COMMERCIAL RLT

TOTAL AREA LOTS 1 & Z;
364,533 S.F. OR 8.369 ACRES

EASEMENT & RIGHT OF WAY

M.S. CONRAIL L.V.R.R. CO., MAIN LINE MAIN STEM
(AS PER TAX MAP)

M.S. CONRAIL C.C.R. CO., OF NJ, MAIN LINE MAIN STEM
(AS PER TAX MAP)

M.S. CONRAIL L.V.R.R. CO., NATIONAL DOCKS BR. MAIN STEM
(AS PER TAX MAP)

LEGEND:

- ⊕ SOIL SAMPLE LOCATION WITHOUT EXCEEDANCE OF NJDEP DCSSL
- ⊕ SOIL SAMPLE EXCEEDANCE OF NJDEP IGW SSL

SAMPLING CHRONOLOGY

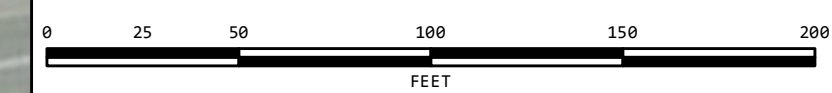
- ⊕ JANUARY / FEBRUARY 2011
- ⊕ JUNE 2011
- ⊕ AUGUST 2011

— SITE 107 BOUNDARY

— ADJOINING PROPERTY BOUNDARY

NOTE:
1. SOIL SAMPLE CONCENTRATIONS EXCEEDING NJDEP IGWSSL ARE DISPLAYED IN THIS EXTENT. ALL OTHER RESULTS NOT CONTAINING EXCEEDANCES OF NJDEP IGWSSL HAVE BEEN OMITTED.

NJDEP IMPACT TO GROUNDWATER SOIL SCREENING LEVELS	IGWSSL (mg/kg)
Antimony	6
Nickel	31
Thallium	3
Vanadium	NC
*NC=No Criteria	



PROJECT: PPG INDUSTRIES
SITE 107

LOCATION: 18 CHAPEL AVENUE
BLOCK 1505, LOT Z
CITY OF JERSEY CITY
HUDSON COUNTY, NEW JERSEY

DRAWING TITLE: CHROMATE CHEMICAL PRODUCTION WASTE:
SOIL SAMPLE EXCEEDANCES OF
NJDEP IMPACT TO GROUNDWATER SSL

DRAWN BY: N.K. **JOB NUMBER:** 10236-1
CHECKED BY: D.N. **FILE:** 10236-1
DATE: 10/09/12 **FIGURE 10**

DRESDNER ROBIN

C:\env\proj\ccts\10236-1\10236-1_PITTSBURGH_Plate and Glass_Site 107-108\Survey\GIS\dtan\GIS\107_10-08-12\F1010_107_CSPM_LCR.mxd

Reference: State of New Jersey Office of Information Technology (NJOIT) 2007-2008, Office of Geographic Information System (OGIS), New Jersey Department of Transportation