



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Site Remediation Program
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

W. Michael McCabe
Site Administrator
Jersey City PPG Chromium Sites

4/1/13

Re: Remedial Investigation Report
Non-Residential Chromate Chemical Production Waste Site – Site 016; Linden
Avenue East, Jersey City, New Jersey

Dear Mr. McCabe:

The New Jersey Department of Environmental Protection (Department) has completed review of the *Remedial Investigation Report, Site 016; Jersey City, New Jersey* (RIR) prepared by Tetra Tech for PPG Industries dated March 2013.

The Department has determined that the RIR is administratively complete and is approvable provided that the following conditions are met. Note that each of the below-listed conditions must be addressed as identified in the specific bullet:

- PPG/Tetra Tech will finalize and resubmit the RIR to include the below listed corrections and submit the final RIR to the Department consistent with the timeframes established in the Master Schedule. Items to be addressed in the final RIR include:
 - Submittal of an updated Case Inventory Document stating that additional remedial investigation is being conducted;
 - Submittal of an updated RIR form consistent with the delineation limitations identified below;
 - Inclusion and identification of the asphalt cap interim remedial measure (IRM) located on the north side of the warehouse building on a figure in the report;
 - Identification of COPR in boring 016_K013 on Figure 7A;
 - Identification of the vanadium exceedance in monitoring well 016_MW07 on Figure 9;
 - Submittal of full data deliverable packages and electronic data deliverables pursuant to N.J.A.C. 7:26E-1.6(a)5.
- Since PPG indicated during a February 19, 2013 meeting that the remedial action beyond the building footprint would be comprised of full excavation, the following needs to be completed during the pre-design phase of the remedy. The results of the pre-design investigation (PDI) must be incorporated into the Remedial Action Workplan/remedial design and submitted to the Department consistent with the timeframes established in the Master Schedule.

- **Soil:** Refine via pre-excavation or pre-design sampling the remedial limits to the south of boring 016_H016 (vanadium, hexavalent chromium, and visible CCPW), to the south/southeast of boring 016_J020 (vanadium), and to the south, east and west of boring 016_L020 (visible CCPW). Additional pre-excavation soil sampling may also be required to refine the soil excavation limits to the north and east of soil borings 016_K007 and 016_K009, since visible CCPW is present within these borings;
 - **Impact to Groundwater (IGW):** Develop a site-specific IGW standard for thallium and antimony, or incorporate the remediation of IGW exceedances into the RAWP/remedial design;
 - **Ecological Evaluation:** The Department disagrees with the conclusion stated within the March 2013 RIR that an ecological risk assessment is not required. PPG/Tetra Tech shall collect surface water and sediment samples within Claremont Creek/Ditch, pursuant to the Department's June 4, 2012 RIR comment letter and the Department's *Ecological Evaluation Technical Guidance* dated August 2012, to determine whether a pathway to the identified Environmentally Sensitive Natural Resources exists.
- Since groundwater contamination has been confirmed, additional groundwater remedial investigation is required. The findings may be reported in a groundwater RIR addendum. The groundwater delineation may be completed following implementation of the soil remedy. During the investigation of groundwater, PPG must determine the locations and invert depths of all utilities in the vicinity of impacted groundwater and compare those data to the horizontal and vertical limits of the impacted plume to determine if there is a potential for contaminant migration along utility bedding and/or infiltration into utilities.

If you have any questions regarding this matter, contact me at (609) 984-2905.

Sincerely,



Thomas J. Cozzi, Assistant Director
Site Remediation DEP

C: Brian McPeak, Project Manager
Dave Doyle, DEP