

**Table 1-1**  
**Achievement of NJDEP Conditions for Approval**  
**Final GA Group RAWP Rev. 4**  
**PPG, Jersey City, New Jersey**

On May 14, 2012, NJDEP issued a Conditional Approval letter for the *Remedial Action Work Plan (Soil), Rev. 2 Garfield Avenue Group – Sites 114, 132, 133, 135, 137 and 143, Jersey City, New Jersey*. The letter stated that NJDEP had determined that the RAWP was administratively complete and approvable provided that the following conditions were met. This table documents achievement of the conditions.

NJDEP CONDITION FOR APPROVAL	PPG RESPONSE
PPG/AECOM will submit a final RAWP, which incorporates all of the below conditions, to the Department consistent with the time established in the Master Schedule.	The FINAL RAWP Rev. 4 achieves NJDEP's conditions, as documented herein.
PPG obtains property owner's consent to accept a deed notice for each parcel where a deed notice is required as a component of the remedial action, pursuant to N.J.A.C. 7:26E-6.2(a)16. If the owner of any real property covered in this RAWP does not consent to the recording of the deed notice required for the proposed remedial action described here-in; PPG will remediate that property to the conditions established in the Chromium Moratorium memo (February 8, 2007) for an unconditional NFA for soils.  Those conditions are as follows: "An unconditional NFA approval relative to chromium can be issued for soils if 1) hexavalent chromium contamination in excess of 20 ppm is excavated and removed from the site and 2) any remaining chromium contamination that fails the SPLP test for impact to ground water is excavated and removed, from the site or treated and left on site provided the treated chromium will not fail the SPLP test in the future. An unconditional NFA approval relative to chromium can also be issued for soils if hexavalent chromium contamination in excess of 20 ppm is treated and left on site provided the resulting concentration of hexavalent chromium in the soil remains below 20 ppm (i.e., no "rebound effect" for hexavalent chromium)."	On May 7, 2012, NJDEP updated the TRSR, N.J.A.C. 7:26E (NJDEP, 2012) to implement the Site Remediation Reform Act, N.J.S.A. 58:10C-1 et seq. The May 7, 2012 updated version of the TRSR does not include (former) 7:26E-6.2, Remedial Action Workplan, which NJDEP references in their May 14, 2012 conditional approval of the DRAFT RAWP Rev. 2. Requirements for remedial action work plans are now provided in the May 7, 2012 updated TRSR in 7:26E-5.5, which does not include the requirement that a RAWP shall include a copy of the property owner's written agreement to record the deed notice whenever a deed notice is required as a component of the remedial action.  PPG will continue to seek the property owners' acceptance of deed notices for remaining parameters that are PPG's responsibility, as required for the issuance of RAPs. Note that PPG has remediated, or is remediating, chromium-impacted soil at the GA Group Sites in accordance with the Chromium Moratorium, except in special instances covered by RAWP Addenda. As such, deed notices are expected to be primarily limited to non-chromium parameters on a subset of the GA Group Sites.
The installation of a capillary break cannot be deferred until redevelopment activities at the site and must be completed immediately upon completion of backfilling activities, unless the redevelopment of the site will proceed immediately following backfilling.	Acknowledged. The capillary break (a groundwater engineering control) is being installed where required per the Master Schedule as part of the Restoration Complete Milestone.
The Excavation Decision Tree (Figure 3-1) shall be revised to mirror the text outlined in Sections 3.3, 3.4, and 6.5 of the RAWP. In lieu of modifying Figure 3-1, PPG/AECOM can choose to accept a revised Figure 3-1, developed by Weston to match the RAWP text, presented as an attachment to this correspondence.	This comment no longer applies as Excavation Decision Tree Figure 3-1 developed by Weston has since been replaced by a revised Figure 3-1, Figure 3-1A and Figure 3-2 in accordance with the <i>NJDEP Updated Method to Determine Compliance with the Department's Chromium Policy dated August 13, 2013</i> , and is currently used in the determination of terminal excavation elevations. <b>Appendix F</b> provides the current Excavation Decision Trees.
In addition to cells J8B and C8B, PPG shall re-excavate cell B8B (which is adjacent to C8B) since hexavalent chromium concentration were detected at concentrations exceeding 20 ppm at depths of less than 20 feet below grade. According to field observations during excavation, meadow mat was encountered during excavation activities; however, the sample was collected from Impacted Soil left in place above the meadow mat. Therefore, re-excavation to the meadow mat is required.	This exceedance was removed in the IRM #1 Northwest Grid Excavation, which was completed on June 20, 2014.
Consistent with the original post-excavation sampling approach for sidewall samples, in areas where sidewall samples will be collected, they shall be collected at a frequency of every 30 linear feet and every 2-foot depth interval to the base of the excavation and shall be analyzed for hexavalent chromium, pH and Eh and 10% of those samples shall be analyzed for TAL Metals, VOCs and SVOCs.	Acknowledged. <b>Section 5</b> reflects this requirement.
Although acknowledged in PPG's response-to-comment table, the RAWP text shall be revised to document that in areas where CCPW remains, PPG shall use a grinding and blending procedure to ensure that the sample is representative of the entire matrix (including COPR nodules) in determining compliance with the remedial limit of 20 mg/kg Cr <sup>+6</sup> . The grinding/blending method developed with the analytical laboratory(ies) shall be provided to the Department for review.	This comment is no longer applicable. PPG is conducting excavation to remove visual CCPW, and as such, the procedure for grinding and blending samples has not been utilized. References to this procedure have been removed from the RAWP.
An evaluation of the potential flooding due to installation of sheet piling will be provided in TEPs as each area is addressed. In the event that the proposed sheet piling exacerbates flooding during storm events, PPG/AECOM will implement additional engineering controls to mitigate the flooding to the extent practicable. In addition, Appendix G of the RAWP and all references to it within the document shall be removed in its entirety. Furthermore, PPG/AECOM will coordinate with JCMUA and the City of Jersey City on all stormwater management issues at the site.	Acknowledged. The former <b>Appendix G, Conceptual Dewater Plan for Southwestern Area of Site 114</b> , was removed from the RAWP.
While the Department acknowledges the schedule assumptions, its duty as a regulatory agency is to assure that the documents shall be administratively complete and technically compliant. PPG's obligation as a responsible party is to ensure that their submittals are compliant with the Department's rules and guidance documents. Since TEPs will contain information which has been deferred from the RAWP, the Department will review all TEPs and provide comments, but will not require approval except as otherwise specified in writing by the Department.	Acknowledged.

CCPW - Chromium Chemical Production Waste  
COPR - Chromite Ore Processing Residue  
Cr+6 - Hexavalent chromium  
GA - Garfield Avenue  
IRM - Interim Remedial Measure  
JCMUA - Jersey City Municipal Utilities Authority  
NFA - No Further Action  
NJDEP - New Jersey Department of Environmental Protection  
ppm - parts per million  
RAWP - Remedial Action Work Plan  
SPLP - Synthetic Precipitations Leaching Procedure  
SVOCs - Semi-volatile Organic Compounds  
TAL - Target Analyte List  
TEP - Technical Execution Plan  
TRSR - Technical Requirements for Site Remediation  
VOCs - Volatile Organic Compounds