

**Attachment B**  
**Dresdner Robin Letter to NJDEP – May 31, 2011**

May 31, 2011

Mr. Thomas J. Cozzi  
Assistant Director  
NJDEP, Site Remediation  
P.O. Box 028  
Trenton, NJ 08625

**Re: PPG Industries, Inc.  
Proposed Hot Spot Remediation  
Site 108**

Dear Mr. Cozzi:

This letter is being submitted on behalf of PPG industries, Inc., for your information in regards to PPG's planned remediation of a single hexavalent chromium exceedance that was detected at the above referenced site during the performance of remedial investigations conducted in January-February 2011.

### Background

In conformance with AECOM's Remedial Investigation Workplan (RIW) dated October 2010, fifty three (53) borings were advanced to assess for the presence of hexavalent chromium. Approximately five (5) samples were collected from each boring and submitted to the laboratory for analysis.

### Findings

Review of the analytical results revealed the presence of hexavalent chromium at concentrations exceeding 20 mg/kg in one (1) of fifty three (53) borings. Sample 108-M018-3.5, collected at 3.5-4.0 ft below ground surface (ft bgs) revealed hexavalent chromium at a concentration of 20.2 mg/kg. The soil sample collected above this sample at 0.0-0.5 ft bgs was not detect and the sample collected below this sample at 4.0-4.5 ft bgs detected chromium at a concentration of 14.3 mg/kg. A figure depicting the soil boring locations and hexavalent chromium results is attached.

### Recommendations

Given that the marginal exceedance of hexavalent chromium is limited to only a single location on Site 108, and in an effort to fast track the investigation/remediation at this site, we plan to excavate and dispose of this soil at an appropriate off-site location in accordance with NJAC 7.26E-6.2(b). The planned excavation will measure approximately 5 ft in length by 5 ft in width by 5

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ft deep. Post excavation samples will be collected along each sidewall at a depth of 3.5-4.0 ft bgs. Given that the hexavalent chromium is already vertically delineated by existing deeper samples, a post excavation base sample is not planned. Also, we draw to your attention that the sample planned for remediation was collected on the property line and that the excavation will be extended onto the adjoining property (Conrail) to assure that all hexavalent chromium exceeding 20 mg/kg has been successfully remediated. We are currently coordinating an access agreement with Conrail for this purpose but anticipate that it may be months before access is granted. Therefore the proposed excavation will be entirely within the limits of Site 108 and will extend to the property boundary with the understanding that additional excavation and post remediation sampling will be performed on the Conrail property in the future. For this first phase of excavation work, post excavation sampling will be limited to the eastern, western and southern sidewalls; the northern sidewall sample will be collected from the Conrail property after access has been granted and the excavation has been performed.

### Schedule

We are currently scheduled to conduct further remedial investigations at Site 107 and Site 108 between June 6 and June 10, 2011. We will perform this limited remedial work during this mobilization. We expect the planned remedial work to take one (1) day to complete. Dust monitoring and health and safety measures would be implemented as set forth in AECOM's RIW dated October 2010 and Dresdner Robin's Health and Safety Plan and Quality Assurance Protocol Plan. No permits are necessary for the planned work.

Please contact me if you have any questions or concerns regarding our planned remedial work at 201.217.9200 x224.

Sincerely,  
Dresdner Robin



Douglas Neumann  
Director

cc: D. Claassen  
P. Amin  
Chrono  
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