

**Attachment E**  
**NJDEP Comment Letter on 5.18.12**



## 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

5/18/12

Re: Remedial Investigation Report  
Non-Residential Chromate Chemical Production Waste Site 108  
Jersey City, New Jersey

Dear Mr. McCabe:

The New Jersey Department of Environmental Protection (Department) has completed review of the *Remedial Investigation Report; Non-Residential Chromate Chemical Production Waste Site 108; Jersey City, New Jersey (RIR)*, prepared by Dresdner Robin for PPG Industries, Inc. (PPG), and dated February 2012.

The Department notes that delineation has not been completed for Site 108 (the Site) to date as described below. In order to expedite progress at this Site and avoid an additional submittal, the Department recommends that a revised RIR not be provided to address these comments at this time. Rather, the revised RIR should be submitted consistent with comments provided below.

#### General Comments

1. Comments to the RIR, submitted via email on April 17, 2012 provided by Environmental Remediation and Financial Services, LLC (ERFS, consultant to Jersey City) were considered during development of these comments. ERFS administrative/editorial comments submitted in the email should be incorporated into the revised RIR.
2. Soil and groundwater delineation has not been completed for chromate chemical processing waste (CCPW) and CCPW-related contamination present at Site 108. Pursuant to New Jersey Administrative Code (N.J.A.C.) 7:26E-4.2 *et seq.* (formerly N.J.A.C. 7:26E-4.1 *et seq.*), additional investigation is required (see specific comments) to complete delineation to the Residential Direct Contact Soil Remediation Standard (RDCSR) and Impact to Groundwater Soil Remediation Standards (IGWSRS) on- and off-site. Historic (off-site) data may be used to supplement the information collected during the Site 108 Remedial Investigation to support this delineation. Alternately, PPG may wish to develop site-specific IGWSRS, consistent with one of the Department-approved methods identified at <http://www.nj.gov/dep/srp/guidance/rs/>. The discussions of IGWSRS exceedances should

include evaluation of the groundwater elevation, as IGWSRS only apply to soils in the vadose zone.

3. Two general concerns on groundwater delineation have been identified. There was one location identified in the temporary well points (108\_TMW\_M006) which should have been completed with a permanent monitoring well. Additionally, vertical delineation must be provided for exceedances detected in shallow groundwater well samples. Since groundwater contamination on Site 108 appears to be emanating from Site 107, it is suggested that these issues be incorporated into the Site 107 groundwater investigation.
4. As per the Department Adequacy of Response to the September 2010 Remedial Investigation Work Plan letter, a utility assessment to compare locations and invert depths with the limits of the groundwater contamination was required upon determination of groundwater contamination. This assessment was not provided, and must be included with the Site 107 groundwater investigation.
5. Pursuant to N.J.A.C. 7:26E-4.9(a)2, an updated receptor evaluation is required to accompany the final RIR.
6. The data qualifiers established by the data validation (provided in Appendix G) must be incorporated into the tables and figures of the RIR.

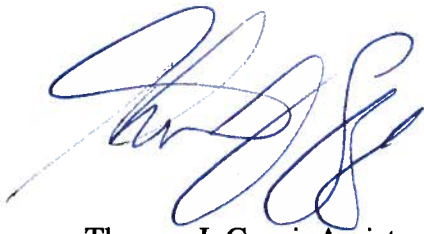
### **Section-Specific Comments**

1. Section 2.1.6, page 3, second bullet: Please ensure meadow mat is defined consistent with previously-approved documents.
2. Section 4.2, page 10, last sentence: Please remove the reference to hexavalent chromium, since a groundwater quality standard for hexavalent chromium does not exist.
3. Section 6.1.1, page 13, first paragraph, last sentence: Please revise the text to state that additional off-site delineation of CCPW, along the adjacent Conrail property, will be performed as part of the remedial investigation of Site 107. See General Comment 2.
4. Section 6.1.3, page 13, second paragraph: Please revise the text to state that additional off-site delineation of antimony, along the adjacent Conrail property, will be performed as part of the remedial investigation of Site 107. See General Comment 2.
5. Section 6.1.3, page 13, third paragraph, first and second bullet: Please revise the text to state that additional off-site delineation of vanadium, along the adjacent Conrail property, will be performed as part of the remedial investigation of Site 107. See General Comment 2.
6. Section 6.1.3, page 13, third paragraph, fourth bullet: See General Comment 2. The Department either requires a minimum of one sample for vanadium in the vicinity of 108\_D012 between the building edge and the property boundary, or a deed notice (including property owner consent) to the property boundary.

7. Section 6.1.3, page 14, first and second paragraphs: See General Comment 2.
8. Section 6.2, page 14, last paragraph: The Department does not agree with the conclusions presented within this paragraph. See General Comment 3. Note that groundwater flow maps must be provided in the Site 107 groundwater investigation.
9. Table 2: Please include the established chromium Residential Direct Contact Soil Cleanup Criterion.
10. Attachment A: Table 1 lists sample 108\_M018\_3.5 (from 3.5' - 4.0' below grade), which does not appear on either the boring log for 108\_M018, which is included in Attachment A, or the monitoring well log, included in Attachment D. Please correct these logs to depict this sample.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Cozzi', written in a cursive style.

Thomas J. Cozzi, Assistant Director  
Site Remediation DEP

C: Brian McPeak, Project Manager  
Dave Doyle, DEP