

February 6, 2012

Mr. Michael McCabe
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4 Normandy Drive
Chadds Ford, PA 19317

**Subject: Response to NJDEP Comments Letter, dated January 10, 2012
Comments on November 2011 Draft Remedial Investigation Report – Soil
Garfield Avenue Group Non-Residential Chromate Chemical Product Waste Sites
114, 132, 133, 135, 137, 143 and 186; Jersey City, New Jersey**

Dear Mr. McCabe:

AECOM, on behalf of PPG Industries, has reviewed the New Jersey Department of Environmental Protection's (NJDEP) January 10, 2012 comment letter pertaining to the submittal of the Remedial Investigation Report - Soil (RIR-Soil), dated November 2011 for the PPG Garfield Avenue group of sites (Sites 114, 132, 133, 135, 137, 143 and 186). The following presents PPG's response to the NJDEP January 10, 2012 comment letter.

Response to Garfield Avenue Group Sites

General Comments

1. Comments to the RIR dated December 19, 2011 from JM Sorge, Inc. (consultant to the property developer), and comments provided by Environmental Remediation and Financial Services, LLC (ERFS, consultant to Jersey City) on December 16, 2011, were considered during development of these comments.

Response: Acknowledged

2. While hexavalent chromium in soils has been delineated to 20 milligrams per kilogram (mg/kg) in all areas where access has been obtained, there were several perimeter borings where chromate chemical processing waste (CCPW) was observed. Specifically, soil borings containing CCPW were identified north and east of Site 114 along Forrest Street, east of Site 114 along Halladay Street and within Carteret Street, east of Halladay Street, even though hexavalent chromium was not detected at concentrations above 20 mg/kg. The extent of this CCPW must be fully identified and subsequently removed.

Response: PPG will delineate the extent of CCPW. The means, methods, and extent of remediation will be addressed in the Remedial Action Work Plan.

3. The Southern Canal Investigation was conducted as a visual inspection of soils to determine the presence/absence of CCPW. With the exception of two (2) samples co-located with samples collected as part of the National Resources Defense Council (NRDC) investigation, it appears as if no samples were collected for laboratory analysis. This is insufficient and additional soil samples will be required to confirm the absence of hexavalent chromium in soils within the southern Morris Canal.

Alternately, PPG may evaluate and use the data presented in the *Site Investigation Report*; 2. 20. 65 *Commercial Street; Jersey City, New Jersey* (included in Appendix B of the RIR).

Response: Section 4.5 of the RI report includes a paragraph stating that the Jersey City Redevelopment Authority (“JCRA”) conducted a Site Investigation (“SI”) in the former Morris Canal area south of Caven Point Avenue and that no Cr⁺⁶ was detected above the laboratory reporting limit or above the CrSCC. However, PPG will advance three soil borings at the canal transect located immediately south of Caven Point Avenue investigated during the RI. Soil samples will be collected in each soil boring at a frequency of one soil sample per four foot depth interval to the top of the meadow mat (about 20 feet deep) and analyzed for Cr+6, Eh, and pH.

4. Data from outstanding field investigation items (i.e., areas with ongoing access issues, and other requirements per this comment letter), including figures, tables, and revised text, may be provided in an Addendum to the RIR, or during the remedial design.

Response: The text, tables, and figures will be revised in accordance with the NJDEP comments provided herein and the RIR finalized for submittal to NJDEP. The results of the outstanding field investigation items will be presented later in an addendum to the RIR.

Section-Specific Comments

1. List of Acronyms/Definitions, page xii, “CCPW”: Please add green gray mud to the end of the definition of CCPW, such that the end of the sentence reads “...including, but not limited to chromium ore processing residue and green gray mud.”

Response: The text will be revised as requested.

2. List of Acronyms/Definitions, page xiii, “Impacted Soil”: Please remove the statement “Unless otherwise specifically stated Impacted Soil extends from the current ground surface (pre-excavation) to a depth of 20 feet below the ground surface.” from the definition provided for impacted soil.

Response: The text will be revised as requested.

3. List of Acronyms/Definitions, page xiii, “Inaccessible Soil”: The definition of inaccessible areas has not been agreed to; thereby the limits of excavation identified for the site boundaries (e.g., west of Interim Remedial Measure [IRM] #1 area, along rail and roadways) have not been established. Please remove the statement “and includes but is not limited to, Soil which is (a) under and within approximately 10 feet of Garfield Avenue, Halladay Street, Forrest Street, Carteret Street or any other street or adjacent to the Project Area and (b) under and within 50 feet of the light rail tracks and (c) under or adjacent (within 10 feet or such that closer excavation would damage the building) to buildings” from the definition provided for inaccessible soil, and replace it with “. Specific locations of inaccessible soil are being determined in cooperation with the Department and will be defined in the RAWP and/or specific Technical Execution Plan(s) developed for specific areas of the site in proximity to those potential inaccessible areas.”

Response: The text will be revised as requested.

4. List of Acronyms/Definitions, page xiv, “Inaccessible Source Material”: The definition of inaccessible areas has not been agreed to; thereby the limits of excavation identified for the site boundaries (e.g., west of IRM 1, along rail and roadways) have not been established. Please remove the statement “and includes but is not limited to, Source Material which is (a) under and within approximately 10 feet of Garfield Avenue, Halladay Street, Forrest Street, Carteret Street or any other street or adjacent to the Project Area and (b) under and within 50 feet of the light rail tracks and (c) under or adjacent (within 10 feet or such that closer excavation would damage the building) to buildings” from the definition provided for inaccessible source material, and replace it with “. Specific locations of inaccessible Source Material are being determined in cooperation with the Department and will be defined in the Remedial Action Work Plan and/or specific Technical Execution Plans developed for specific areas of the site in proximity to those potential inaccessible areas.”

Response: The text will be revised as requested.

5. List of Acronyms/Definitions, page xv, “Soil”: The definition of soil should not be limited by depth. The investigation of soils deeper than 20 feet below grade is addressed in this RIR. Further, the RIR is not a Remedial Action Work Plan; therefore references to “this RAWP” in the definition and throughout the document should be removed. Please revise the definition to be consistent with the conceptual remedy presented to the court on July 15, 2011.

Response: The July 15, 2011 conceptual remedy does not specifically define “soil”; rather, it describes the remediation of contaminated materials including soil. Therefore, the text will be revised to say: “Soil: All solid material above bedrock (other than source material) including fill, gravel, sand, silt, and clay.”

6. Section 2.2.4.1.3, CVOCs: There appears to be no basis for the statement “The suspected source of these CVOCs is the former commercial businesses succeeding PPG’s operations at the site.” Please remove.

Response: The text will be revised as requested.

7. Table 4-2: The designations for borings EF-38 and EF-38A appear to be reversed. Please correct.

Response: The boring designations for EF-38 and EF-38A will be corrected in Table 4-2. Corrections will also be made in Tables II-1 and II-3 of Appendix I, and in the NJDEP HAZSITE EDD files.

8. Table 4-2 and Figure 5-1: Table 4-4 indicates that borings EF-42 and EF-43 were moved to the street; however, Figure 5-1 does not depict this. Please clarify and/or correct.

Response: Table 4-1 will be revised to state that the borings were moved to the edge of the sidewalk. The boring locations are correct on Figure 5-1.

9. Section 7, Recommendations: Please fully identify the limits of CCPW north and east of Site 114 along Forrest Street, east of Site 114 along Halladay Street and within Carteret Street, east of Halladay Street. See General Comment 2.

Response: PPG will delineate the CCPW in these areas.

10. Figures 5-1 through 5-33: Historic CCPW metals data for Site 186 (e.g., which was presented in the 2000 Kimball *Site Characterization Report* included as Appendix E of the February 2010 *Remedial Investigation Work Plan* for the Garfield Avenue Group sites) should be incorporated into Figures 5-1, 5-4, 5-6, and 5-9, and into the applicable tables. Alternately, if Site 186 will be addressed in a separate remedial investigation report and/or remedial action work plan, those data may be incorporated into the applicable figures and tables for the stand-alone RIR or remedial action work plan.

Response: PPG will be conducting additional Remedial Investigation at Site 186. This data will be presented in a future addendum to the Garfield Avenue Group Soil RI Report.

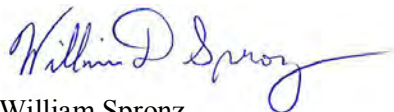
11. Remedial Investigation Report Form, Section J: Please provide an answer to Question 4.

Response: The RI Report Form will be revised as requested.

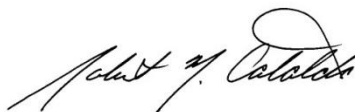
12. Remedial Investigation Report Form, Section K: Please add a note that the groundwater remedial investigation is being handled under a separate RIR.

Response: The RI Report Form will be revised as requested.

Sincerely,



William Spronz
RI Technical Lead



Robert M. Cataldo, PG
RI Program Lead

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