

LF – linear foot

6.1.1 Compliance Attainment by Averaging for CCPW Exceedances

The Sb concentration exceeded the DIGWSSL for the following samples: LA1-1 (3.0-3.5); 156-PE-57N_C0-6; 156-PE-82_B12-18; 156-B73B_1.5-2.0X; 156-B76W_3-4b; 156-B76W_3-4bd; 156-B76W_4-5c and 156-B97_A2-3. Compliance with the DIGWSSL was attained through compliance averaging. A memorandum documenting the averaging is provided in **Appendix O**.

6.2 Resolution of Compliance Exceptions

There are two locations where soil remaining in place exceeds the 20 mg/kg CrSCC for Cr⁺⁶. An explanation for these exceptions is provided below.

6.2.1 Discussion Regarding Samples B74 and PE-81

Soil sample results listed in **Table 5** exceed the NJDEP's CrSCC of 20 mg/kg Cr⁺⁶ and are located below the TEE, according to the final as-built survey prepared contours.

Table 5 Samples Remaining in Place with Cr⁺⁶ Concentrations Exceeding the 20 mg/kg CrSCC

Original Location ID	Grid ID	Layout Area	Sample Date	Cr ⁺⁶ (mg/kg)	Q	TEE (ft NAVD 88)	Sample Elevation (ft NAVD 88)
B74	N/A	1	8/31/2006	27.25	U	N/A	-6.7 to -7.2
PE-81	J1	3	9/29/2011	20.5		5.5	5.2 to 4.7

Notes:

Cr⁺⁶ – hexavalent chromium

ft - feet

N/A – not available

NAVD 88 – North American Vertical Datum of 1988

Q – qualifier

ID - identifier

mg/kg – milligrams per kilogram

U - The analyte was not detected above the sample reporting limit shown.

TEE – terminal excavation elevation

The sample from boring B74 was a pre-excavation sample; the Cr⁺⁶ result was not detected at a concentration exceeding the detection limit (which was greater than the 20 mg/kg CrSCC). The sample was not addressed in subsequent pre-excavation sampling and its location was not excavated. Sample 156-B74G-13.5-14.0, which correlates to boring B74, was diluted by the laboratory. No reason for the dilution was provided in the laboratory data package, or the data validation report. The raw data appears to indicate that this sample had a color or some type of interference, because the background absorbance is quite high for this sample compared to others in this sample delivery group. The results for three samples collected at depth intervals above this sample were non-detect (8-8.5 ft bgs [2.46 U mg/kg], 10-10.5 ft bgs [2.29 U mg/kg], and 12-12.5 ft bgs [2.36 U mg/kg]) with reporting limits less than 20 mg/kg. The boring log depicts a profile of fill material overlying native soil with native soil observed at 9.6 ft bgs (**Appendix N**). Sample 156-B74G-13.5-14.0 was collected in peat (**Appendix N**). The Cr⁺⁶ concentration profile and the boring log