

Appendix D

Response to NJDEP Comments May 2017 Draft *Interim Remedial Action Report*

July 14, 2017 NJDEP Comments on May 2017 Draft Interim Remedial Action Report; Hudson County Non-Residential Chromate Chemical Production Waste Sites; Hudson County Chrome Site 174; Dennis P. Collins Park; West First Street; Bayonne, Hudson County, New Jersey (IRAR)

Comment #	Comment	Response	Location in NGA Document 174-022 Remedial Action Report for Soil
General Comment 1	The IRAR documents the presence of CCPW-related impacts beyond the limits of the interim remedial excavation described in the report. Please note that the future Remedial Action Work Plan must include a draft deed notice for the engineering control.	A draft deed notice (DN) and draft notice in lieu of deed notice (NILDN) were submitted to the NJDEP in May 2019. The NJDEP issued comments on the DN and NILDN on July 12, 2019. Revisions to the DN and NILDN, as requested by the NJDEP, have been incorporated into NGA Document 174-022 Remedial Action Report for Soil	Deed Notice - Appendix I Notice in Lieu of Deed Notice - Appendix J
General Comment 2	The following required items were not included in the IRAR as required per the identified citation: 1. Certification, per N.J.A.C. 7:26E-1.6(a)2; 2. Case Inventory Document, per N.J.A.C. 7:26E-1.6(a)3; 3. Quality Assurance Project Plan, per N.J.A.C. 7:26E-1.6(a)4, either as an attachment or by reference; 4. Documentation that electronic data deliverable packages have been uploaded pursuant to N.J.A.C. 7:26E-1.6(a)5. 5. GIS-compatible site plan, per N.J.A.C. 7:26E-1.6(a)6; 6. Discussion of significant events/seasonal variations, per N.J.A.C. 7:26E-1.6(b)2; 7. Results and implications of field measurements, per N.J.A.C. 7:26E-1.6(b)3; 8. Since more than 25 data points were collected, maps with isopleths/cross sections, per N.J.A.C. 7:26E-1.6(b)8; 9. Total remedial action cost through implementation of remedial action, per N.J.A.C. 7:26E-5.7(b)10; and 10. Description of each permit required/obtained to implement remedial action, per N.J.A.C. 7:26E-5.7(b)13. Please note that these items must be included in the Remedial Action Report prepared for the site-wide remedy.	1. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 2. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 3. The submission of a Quality Assurance Project Plan is not applicable for a Remedial Action Report, per N.J.A.C. 7:26E-1.6(a)4. Samples obtained for analysis were collected in accordance with the NJDEP <i>Field Sampling Procedures Manual</i> (last revised August 2005) and the program-wide <i>Field Sampling Plan/Quality Assurance Project Plan</i> (FSP-QAPP, AECOM, 2010). 4. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 5. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 6. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 7. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 8. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 9. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil 10. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil	1. The Cover/Certification Form is included with the Regulatory Forms. 2. The Case Inventory Document (CID) is included with the Regulatory Forms. 3. Not applicable. 4. Appendix E 5. The GIS compatible site plan is Figure 2 6. Section 4.2.2 and Section 4.3.10 7. Not applicable for this site. 8. Figure 7 9. Section 6.3 10. Section 4.1 and Section 6.6
Section-Specific Comment 1	Executive Summary, page vii, third bullet: The text states that "certain portions of the site have been found to be contaminated with total and/or hexavalent chromium in excess of the Chromium Soil Cleanup Criteria (CrSCC)..." Please note that there is no remedial standard or CrSCC for total chromium, and analytical results show the CrSCC for trivalent chromium has not been exceeded in site soil samples. Please correct the text. In addition, CCPW metals are defined in the text as antimony, nickel, thallium, and vanadium. Please note that CCPW metals include total chromium.	Total chromium results are compared to the interim NJDEP Residential SCC for trivalent chromium of 120,000 mg/kg as the cleanup criteria for soil at this site. There is no non-residential SCC for trivalent chromium. The text, tables, and figures of NGA Document 174-022 Remedial Action Report for Soil have been revised accordingly.	Section 3.2 Tables 1 through 3 Figures 4 - 6; Figure 8
Section-Specific Comment 2	Section 1.0, page 1: The tax block/lot descriptors provided do not agree with those shown on Figure 2. Specifically, the text includes Block 383 Lots 1 and 3 which were not observed on Figure 3, and Figure 3 identifies Block 385 Lots 1, 2, 3, and 6 and Block 392 Lot 5 which are not included in the text description. Please ensure that the property description is correct and consistent throughout the document and on applicable forms.	This discrepancy was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP), which was approved by the NJDEP in August 2019.	Section 1.0 Figure 2, Sheet 1
Section-Specific Comment 3	Section 2.4, page 4, 1st paragraph: The text refers to Figure 4 for the locations of monitoring wells installed by Kimball in 1999. These well locations were not shown on Figure 4, however, it appears they were provided on Figure 2 within Appendix A as well as on Figure 2 in the Kimball report excerpt in Appendix A. Please ensure that internal references are correct.	This information was submitted with the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP), which was approved by the NJDEP in August 2019.	Figure 2, Sheet 2 Figure 3 Appendix A
Section-Specific Comment 4	Section 3.0, page 5, 2nd paragraph after bullets: Please note that by statute, historic fill excludes CCPW. References to historic fill as relates to CCPW-impacted material should be removed from the report.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP) by creating a separate area of concern (AOC) for Historic-Fill Impacted Soil (AOC-2).	Not Applicable
Section-Specific Comment 5	Section 3.4, page 11, fifth bullet: the text states the lowest nickel concentration was non-detect. All of the samples presented in Appendix A Table 7A had detectable concentrations of nickel; the lowest reported (estimated) concentration was 6.7 milligrams per kilogram (mg/kg) at location 174S03 at both 9-10 and 10-11 feet depth. Please ensure statements in text are consistent with the data.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Not Applicable
Section-Specific Comment 6	Section 3.5, page 12, second bullet: The highest total chromium concentration reported in the text was 193 mg/kg; however, Table 8A in Appendix A reported 194J mg/kg chromium in in sample 174-S123-0.0.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Not Applicable
Section-Specific Comment 7	Section 3.6, page 13: The IRAR should include a figure depicting the location/extent of the limited remedial excavation performed in 2013, or show the limits on one of the figures provided with the document. Additionally, the locations of the test holes mentioned in the text should be presented on one of the figures provided with the IRAR and boring logs provided in Appendix B.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Figure - not applicable Boring logs - Appendix K
Section-Specific Comment 8	Section 3.7, pages 13-14: a. The discussion of analytical results should include CCPW metals analysis, including comparison to impact to groundwater soil screening levels, and those instances where detection levels are elevated above applicable remedial limits. b. Since the boring logs for test holes TH-8 through TH-22, discussed in the third paragraph refer to "suspected COPR," it is recommended that the text use consistent reference. c. The text of the fifth paragraph refers to boring TH-41. Please ensure soil boring logs for all installed borings are provided in Appendix B.	a. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil b. This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP). c. This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	a. Section 6.0; Tables 2 and 3 b. Not applicable c. Not applicable
Section-Specific Comment 9	Section 3.9, page 16: The text in the fourth paragraph reports exceedances of Residential Direct Contact Soil Remediation Standards (RDCSRS) for antimony (Sb) and vanadium (V) in borings SDL_01, SDL_04, SDL_05, and SDL_32. Table 3 shows one exceedance of RDSCRS (SDL_19 for Nickel [Ni]) and exceedances of impact to groundwater soil screening levels (IGWSSL) in borings SDL_01 (Sb), SDL_04 (Sb), SDL_05 (Sb), SDL_19 (Ni), as well as a non-detected concentration of thallium (Tl) in SDL_26 where the detection level was elevated above the IGWSSL. Please ensure the text is consistent with the data. Also, the text of the paragraph following the bullets discusses a vanadium exceedance of the RDCSRS. Upon approval of the alternative remedial standard for vanadium, the RDCSRS no longer applies. Please update the text.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Not Applicable

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Section-Specific Comment 10	Section 3.11: The text of the first paragraph on page 18 refers to Figure 15 for the locations of the two interim remedial measures IRMs installed by LMS on behalf of the NJDEP; however, Figure 15 shows only the IRM installed along the shoreline. Please ensure all figures present all information referenced in the document. The text of this section should also discuss IRM Areas 2 and 9 which are shown on Figure 15.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Section 2.2 Figure 3
Section-Specific Comment 11	Section 4.0: The limits of AOC-1 should be updated based on the current understanding of the site, and is expected to encompass the area within the clean site boundaries established by PPG's 2015 remedial investigation (i.e., bounded by the perimeter soil boring limits shown on Figure 14).	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Figure 2
Section-Specific Comment 12	Section 6: The text indicates hazardous materials were disposed of at EQ Industrial Services in Belleville, MI. Based on the manifests provided in Appendix F, EQ Industrial Services is the name of the transporter; the disposal facility is identified on the manifests as Michigan Disposal Waste Treatment Plant. Please correct the text.	Refer to Location in NGA Document 174-022 Remedial Action Report for Soil	Section 6.4.1 Appendix L
Section-Specific Comment 13	Section 6.1, pages 25-27: Please describe all permits obtained, as per N.J.A.C. 7:26E-5.7(b)13. Also, please provide a copy of the Project Air Monitoring Plan (AMP), and any data collected consistent with the AMP, as an appendix.	There is no regulatory requirement to submit data collected consistent with the AMP; however the AMPs for each scope of work indicated a final air monitoring report would be prepared. Refer to Location in NGA Document 174-022 Remedial Action Report for Soil.	Permits: Section 4.1 and Section 6.6 Air Monitoring: Section 4.1 Section 4.2.1 Section 4.3 Section 4.3.9.2 Appendix C
Section-Specific Comment 14	Section 6.2, page 27, first paragraph: The text indicates the remedial action was performed from April through October 2016, and that activities are described in the daily reports. Appendix E provides daily reports through 9/23/16. Please describe activities between that date and the end of the remedial action, or provide daily reports through October 2016.	There is no regulatory requirement to submit information documenting daily site activities. Intrusive site work was completed in September 2016. APTIM remained onsite through October 2016 to monitor the establishment of vegetation.	Section 4.2.1
Section-Specific Comment 15	Section 6.2.1, page 29, second paragraph: The text states "...the berm area excavation and the main excavation area... are joined to the southeast of the restroom building and are being treated as one excavation..." However, the Post-Excavation drawing in Appendix K depicts these two excavation areas as having separate and distinct excavation limits. Please ensure the remedial limits are accurately depicted on all drawings and accurately described in the text.	See NGA Document 174-022 Remedial Action Report for Soil	Figure 4 and 5 Appendix G
Section-Specific Comment 16	Section 6.2.3.2, page 34, second paragraph: Weston Solutions should be identified as the "Independent Technical Consultant" per the Judicial Consent Order, rather than as "NJDEP's technical consultant." Also, please remove references to Weston agreeing to an institutional control for the restroom; only the property owner and the Department have the authority to agree to such a remedial action. Please note that an engineering control may also be required in this area. Additionally, the impacted area should be shown on a figure in the IRAR.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Section 4.2.1 Section 4.3.9 Figures Appendix I
Section-Specific Comment 17	Section 6.2.3.3, page 34, second paragraph: See Section-Specific Comment 16.	This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).	Section 4.2.1 Section 4.3.9 Figures Appendix I
Section-Specific Comment 18	Section 6.3, page 35: Please identify the IRM number as shown on Figure 15 for the shoreline stabilization activities described herein.	Completion of the 2020-2021 RA eliminated IRMs in connection with the site.	Figure 3
Section-Specific Comment 19	Section 6.4.1, page 35: The text indicates backfill was obtained from Tilcon's Mount Hope quarry; however, the weight tickets provided in Appendix G indicate fill was obtained from both the Mount Hope quarry and Tilcon's Pompton Lakes quarry. Additionally, the text states that "documentation of NJDEP review and acceptance of the [topsoil] material is provided in Appendix M"; however, no such documentation was included.	The discrepancies noted on sources of fill material have been addressed. Information pertaining to NJDEP's acceptance of the topsoil material for the 2016 RA has been included in NGA Document 174-022 Remedial Action Report for Soil.	Section 6.5 Appendix N
Section-Specific Comment 20	Section 7.0, page 39, last paragraph: The text states "no gross QC failures were noted for constituents of concern at the site" and "the laboratory data are usable for the intended purpose." However, there were several samples that were rejected. Please revise the text to be consistent with the data set presented in the document.	Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil	Section 5.0 Appendix F
Section-Specific Comment 21	Section 9, page 42, last paragraph: The text states "the locations targeted as part of this remedial action... have been remediated to the appropriate criteria and/or standards." It is noted that samples were not collected in proximity to the CCPW remaining in the bedding around the sewer line as discussed in Section 6.2.3.3 of the IRAR, and that impacted concrete remains in the bathroom foundation as discussed in Section 6.2.3.2 of the IRAR. The conclusions section of this report should make specific mention of these areas of known contamination and identify that these areas will be included in the site-wide remedy.	Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil	Section 4.4 Appendix I

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Section-Specific Comment 22	<p>Tables:</p> <p>a. Analytical data associated with soils removed during the course of the remedial action should not be presented in tables (e.g., Table 1) depicting "post-excavation" conditions. Discrepancies were noted on the analytical tables where shallow soil samples were excavated during the remedial action; however, some locations and/or intervals are reported as remaining onsite and representative of post-remedial conditions.</p> <p>b. Analytical results reported as non-detect but where the Method Detection Limit (MDL) is elevated above the applicable standards should be highlighted or footnoted throughout the tables. Non-detect results must be evaluated for usability of those results where reporting limit exceeds remedial standard. Additionally, several results were highlighted exceeding the IGWSSL standards, however, the sample intervals are located within the water table. Please revise accordingly.</p> <p>c. Rejected data should be evaluated for usability consistent with Department protocols and Guidance. There were observations where data were identified as rejected in the laboratory reports (e.g. SB-14 8-8.5, SB-18 10-10.5, and SB-19 0.33-0.83), but an evaluation of the data usability (or even documentation of their rejected status) was not provided. See Section-Specific Comment 20.</p> <p>d. Table 2 should be removed.</p> <p>e. Table 3 –The following locations are not reported in the table but were shown on Figure 14: SDL_27, SDL_28, SDL_29, SDL_30, SDL_36, SDL_37, and SDL_40.</p> <p>f. Table 6 – Sample ID PPG174-BERM-SW05 depth interval is reported as 6.3-6.8 feet below ground surface (ft bgs) but the excavation was shallow. Please ensure the depth interval is accurately presented.</p> <p>g. Table 8 – The hexavalent chromium analytical result for PPG174-MAIN-CC03 exceeds 20 mg/kg and should be highlighted.</p> <p>h. The Department recommends that PPG/CB&I and the Independent Technical Consultant participate in an in-person technical meeting to discuss detailed comments on the tables and figures.</p>	<p>a. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>b. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>c. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>d. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>e. This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).</p> <p>f. The depth interval of 6.3-6.8 ft bgs was a typographical error. The correct sample depth is 1.3-1.8 ft bgs.</p> <p>g. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>h. Information related to the 2016 remedial action is being resubmitted with NGA Document 174-022 Remedial Action Report for Soil. PPG is available for an in-person/virtual technical review, if warranted.</p>	<p>a. Tables 1, 2, and 3</p> <p>b. Tables 1, 2, and 3</p> <p>c. Section 5.0 and Appendix F</p> <p>d. Not applicable</p> <p>e. Not applicable</p> <p>f. Tables 1, 2, and 3</p> <p>g. Table 1. This concrete sample location was removed during the 2020-2021 remedial action activities to accommodate expansion of the parking area.</p> <p>h. Not applicable</p>
Section-Specific Comment 23	<p>Figures:</p> <p>a. In Figure 2, see Section-Specific Comment 2.</p> <p>b. Figures (e.g., Figures 3 through 13) should clearly depict the site boundary, the limits of the Park, and areas under investigation. Lot boundaries are depicted in three colors, and there are boundaries on the figure that are not represented in the legend. Title blocks and legends should be updated, and the note section should correlate to the notes from the corresponding tables. IRM areas are not representative of current conditions throughout several of the figures.</p> <p>c. Analytical data and boring locations associated with soils removed during the course of the remedial action should not be presented in figures (e.g., Figures 4 through 13) depicting "post-excavation" conditions. Discrepancies were noted on the figures and in call-out boxes where shallow soil samples had been excavated during the remedial action but where some locations and/or intervals are reported as remaining onsite and representative of post-remedial conditions. Call out boxes are missing for several locations that were not excavated (e.g., SB-22 and SB-23).</p> <p>d. Vanadium standard and analytical results reported below the standard should be revised on Figures 3 through 10.</p> <p>e. The locations of soil borings completed by Kimball, LMS, and Berger are shown on the figures but no historical analytical data or information was provided on the tables, nor were no call-out boxes provided on the figures.</p> <p>f. IRM areas are not representative of current conditions on Figure 14, and the legend needs to be updated to include additional information. Additionally, boring locations, SDL_42A and SDL_46A, are not depicted on the figure.</p> <p>g. The depth in ft bgs for PPG174-BERM-SW05 requires revision on Figure 18. PPG174-MAIN-SW01 and PPG174-MAIN-SW02 call out boxes are presented on Figure 18 but locations were excavated. Notes on Table 6 regarding some of the sample IDs should be reflected on the notes in Figure 18.</p> <p>h. Some of the call out boxes on Figure 20 are transposed between the two playground excavation areas; see Section-Specific Comment 22h.</p> <p>i. The IRAR should present a figure depicting the pre-excavation survey elevations, so that an evaluation of excavation depth and adequacy of excavation to address exceedances/CCPW observed in pre-remedial investigation borings can be made by comparing the post-excavation survey information with pre-excavation survey limits.</p> <p>j. The remedial excavation limit shown on Figures 16 through 18 do not agree with the excavation limits shown on the Post-Excavation As-Built Survey presented in Appendix K. Please ensure the remedial limits presented in all figures are accurate. See Section-Specific Comment 15.</p>	<p>a. This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).</p> <p>b. This was addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP).</p> <p>c. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>d. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>e. This information was included with the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP) and has been incorporated into the Deed Notice.</p> <p>f. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>g. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>h. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p> <p>i. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil.</p> <p>j. Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil</p>	<p>a. Figure 2</p> <p>b. Figure 2</p> <p>c. Tables 1, 2, and 3; Figures 4 - 6, 8</p> <p>d. Tables 1, 2, and 3; Figures 4 - 6, 8</p> <p>e. Not applicable</p> <p>f. Figure 3</p> <p>g. Figure 5, Tables 1, 2, and 3</p> <p>h. Figure 6</p> <p>i. Figure 2, Sheet 1 of 2; Tables 1, 2, and 3</p> <p>j. Figures 4 - 6 and Appendix G</p>

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Section-Specific Comment 24	<p>Appendix B:</p> <p>a. Several locations of suspected COPR identified in the boring logs were beyond the excavation limits shown on Figures 16 through 18 (e.g., TH-9 @4-26 inches depth, TH-10 @ 3-20 inches depth, TH-11 @4-27 inches depth). Please ensure that all locations with suspected CCPW is adequately addressed in the future site-wide reports; see General Comment 1.</p> <p>b. The log for boring SB-29 suggests COPR present to a depth of 2 feet depth; however, the post-excavation survey suggests that the remedial excavation associated with the location of SB-29 was excavated to 1 feet depth. See General Comment 1.</p> <p>c. Not all boring logs are presented herein (e.g., SDL_42A, SDL_46A); please ensure that all applicable information is provided.</p>	Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil	<p>a. Appendix I</p> <p>b. Appendix I</p> <p>c. Appendix K</p> <p>i. Sample IDs beginning with SDL_42 and SDL_42A were collected from the same borehole. The boring log is titled SDL_42.</p> <p>ii. Sample IDs beginning with SDL_46 and SDL_46A were collected from the same borehole. The boring log is titled SDL_46.</p>
Section-Specific Comment 25	Appendix C: Please ensure the Alternative Remediation Standard request forms are certified as required. See General Comment 1. The IRAR should provide documentation of approval of the alternative remediation standard(s) when received.	These items were addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP). The NJDEP approved the ARS requests for the site on August 15, 2019.	Section 3.2 Appendix B
Section-Specific Comment 26	Appendix E: Please populate the photo log for the July 13, 2016 daily report.	Given that there is no regulatory requirement submit reports to document daily site activities, this information is not being resubmitted	Not Applicable
Section-Specific Comment 27	Appendix F: It is not necessary to include Time, Labor & Equipment Time Reports with the waste shipping records, as was done in several instances.	Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil	Time, Labor and Equipment Time Reports are not applicable Waste manifest records are provided in Appendix L and Appendix M
Section-Specific Comment 28	Appendix G: Weight tickets are provided for backfill loads delivered through 7/13/16, yet the daily reports in Appendix E indicate that backfill was delivered to the site through mid-August. Please ensure all appropriate documentation is provided in the IRAR.	Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil	Daily reports are not applicable Weight tickets are provided in Appendix N
Section-Specific Comment 29	Appendix H: The imported fill data provided in Appendix H is for a single sample collected on 6/14/15. Per the weight tickets shown in Appendix G, fill was imported to the site as early as 4/4/16, and from two locations (Tilcon's Mt Hope quarry and Pompton Lakes quarry). Please ensure representative data are provided for each of the fill sources used for the remedial action.	Acknowledged. See NGA Document 174-022 Remedial Action Report for Soil	Appendix N
Section-Specific Comment 30	Appendix K: The remedial limits shown on the As-Built Plan do not agree with those shown on the Post Excavation figure within Appendix K, nor on Figures 16 through 18 within the IRAR. Please ensure the horizontal and vertical remedial limits are accurately identified throughout the document and on the draft deed notice when one is generated for the remainder of the site. See also Section-Specific Comment 15 and Section-Specific Comment 23j.	See NGA Document 174-022 Remedial Action Report for Soil	Figures 4 - 6 Appendix G
Section-Specific Comment 31	Appendix M: Please include in this appendix appropriate information (e.g., analytical data) associated with the topsoil sample collected on July 14, 2016, as well as the documentation (via email on August 30, 2016) that the backfill was determined to be suitable for use at the site.	Information pertaining to NJDEP's acceptance of the topsoil material for the 2016 RA has been included in NGA Document 174-022 Remedial Action Report for Soil.	Appendix N
Section-Specific Comment 32	<p>Appendix N: Please confirm that the receptor evaluation has been updated from the 2012 version.</p> <p>a. The list of addresses, facility names, type of use, and a map depicting each location relative to the site was not included in the Receptor Evaluation as required in Section B of the form.</p> <p>b. The date the ecological evaluation was conducted was not provided in Section F question 1.</p> <p>c. The site boundaries, and identified sensitive populations/uses were not shown on the figure. It is not clear that the 200-ft area around the site boundary in all directions was identified (e.g., to east and west of park boundaries).</p>	These items were addressed in the August 2019 Remedial Investigation Report Addendum/Remedial Action Work Plan (August 2019 RIRA/RAWP) and have been updated for NGA Document 174-022 Remedial Action Report for Soil	Regulatory Forms