

Memorandum

To	Thomas Gibbons (CB&I)	Page	1
CC	Keith Prins (PPG), Mark Terril (PPG), Scott Mikaelian (AECOM)		
Subject	Site 186 RAWP Addendum - Soil Remedial Action at Metropolitan Family Health Network		
From	Alfred LoPilato (AECOM)		
Date	October 25, 2013		

RE: Hudson County Chromate Site 186 - Remedial Action Work Plan (RAWP) – Proposed RAWP Addendum - Soil Remedial Action at Metropolitan Family Health Network, 935 Garfield Avenue, Jersey City, NJ

Tom –

As you know, on Saturday October 12, 2013, PPG/AECOM/ENTACT implemented a Remedial Investigation (RI) at the Metropolitan Family Health Network (MFHN) property, adjacent and south of Site 186.

The purpose of the RI was to investigate the presence/non-presence of visible Chromate Chemical Production Waste (CCPW) on the MFHN side of the fence/property boundary, since visible CCPW was observed at the property boundary on Site 186.

The scope of the RI potentially included both “initial” and “contingency” investigation activities, as presented in AECOM’s Technical Memorandum dated September 16, 2013, and as approved by the New Jersey Department of Environmental Protection (NJDEP). A summary of the investigation results and proposed additional actions is provided below.

Initial Investigation Results

The initial investigation activities included excavation of a narrow trench (approximately 3-feet wide) along the fence line/property boundary to a depth of approximately 3-feet below ground surface. The trench was excavated starting at the east side of the property, and continued west along the fence towards the sidewalk adjacent to the MFHN building (Figure 1, attached)

Visible CCPW was not observed by PPG/AECOM or Weston/NJDEP personnel in either the soils excavated from the trench, nor on the excavation sidewalls. As a result, “contingency” RI activities (i.e. expanded excavation) were not required to be implemented.

A total of four confirmatory soil samples were collected (MFHT1-2.0-2.5 through MFHT1-4-2.0-2.5) from within the excavated trench (as depicted on Figure 1), and analyzed for hexavalent chromium (Cr+6) by Accutest Laboratories in Dayton, NJ. One duplicate sample (186-MFHT1-2.0-2.5X) was also collected.

Analytical results indicate Cr+6 concentrations ranged from 1.4 mg/kg to 24.1 mg/kg, as presented in Table 1 below:

**TABLE 1
Hexavalent Chromium Analytical Results
Soil Samples Collected at MFHN
October 12, 2013**

Lab Sample ID	Client Sample ID	Sample Depth (feet bgs)	Analytical Result (Cr+6 mg/kg)
JB50090-6	186-MFHT1-2.0-2.5	2.0-2.5	4.7
JB50090-5	186-MFHT1-2.0-2.5X	2.0-2.5	5.6
JB50090-4R	186-MFHT1-2-2.0-2.5	2.0-2.5	1.4
JB50090-3	186-MFHT1-3-2.0-2.5	2.0-2.5	24.1
JB50090-2	186-MFHT1-4-2.0-2.5	2.0-2.5	5.8

BOLD results exceed the NJDEP Chromium Soil Cleanup Criteria of 20.0 mg/kg.

The laboratory data packages are included in Appendix A. The analytical results were subsequently validated by AECOM and determined to be useable for their intended purpose. AECOM's Validation Report is included as Appendix B.

Based on these findings, a presumably small area of actionable Cr+6 impacted soil exists on MFHN property, in the vicinity of sample location 186-MFHT1-3-2.0-2.5.

This sample exceedence is already delineated to the NORTH (via clean fill previously placed on Site 186), to the WEST via Sample 186-MFHT-2-2.0-2.5, and to the EAST by Sample 186-MFHT1-4-2.0-2.5. At a minimum, additional delineation sampling is required to the SOUTH, and also vertically (2.5-3.0 feet).

Proposed Remedial Action

PPG's proposed remedial action for soils near this sample location is excavation/removal, and off-site disposal. Prior to excavation, PPG proposes to collect four additional "Pre-Post-Excavation" delineation soil samples, as depicted in Figure 1. Assuming the analytical results exhibit Cr+6 concentrations below 20.0 mg/kg, this will allow for a smaller overall excavation area, and also allow for site restoration immediately following excavation.

The Pre-Post Excavation samples will be collected via hand auger at the locations and depths depicted on Figure 1. Analysis for Cr+6 will be requested on an expedited turnaround basis.

Note that during investigation activities, a subsurface concrete foundation structure was observed near the exceedence sample 186-MFHT1-3-2.0-2.5. Therefore, a sample of this concrete will be collected for Cr+6 analysis, and analyzed with the pre-post excavation samples.

Note that all of the applicable Health and Safety (H&S), air monitoring and disposal requirements stipulated in the Site 186 RAWP apply, and will be implemented, during the activities at MFHN, as well as Site 186. Additionally, the new temporary fencing at MFHN will be fitted with privacy screen to secure the work area during excavation activities. The excavated area will be backfilled with clean fill pursuant to NJDEP requirements, and the sod will be repaired/replaced.

Related Concerns

MFHN Fence Removal

Note that the current MFHN fencing along the property boundary will have to be removed to conduct the remedial activity proposed herein, as well as the removal of remaining visible CCPW material along the fence line on Site 186. PPG/ENTACT will request approval from MFHN to install temporary construction fencing, remove the existing fence, then re-install the original fencing upon completion of remediation activities. Note that it is likely the concrete footings for the existing fence will need to be re-poured, and depending on weather conditions, a few days' time for this concrete to set may be needed.

Temporary Re-Route of Pedestrian Traffic Along Garfield Avenue

The sidewalk along Garfield Avenue, adjacent to the east side of Site 186, will be closed during completion of Site 186 remediation activities. Pedestrian traffic will be re-routed, pursuant to the permit obtained from Jersey City by ENTACT, to a temporary walkway created using two rows of Jersey barriers, positioned adjacent to the current sidewalk and an appropriate distance into Garfield Avenue, respectively (see Figure 1). Although permission from MFHN to divert pedestrian traffic is not required, as a courtesy they will be notified, since this may affect patrons of their facility. Should the sidewalk become damaged or need to be removed during remediation activities, it will be repaired or replaced in accordance with Permit Requirements as issued by Jersey City. A copy of the permit is included in Appendix C. No excavation activity is planned beyond the sidewalk in Garfield Avenue

Schedule

NJDEP has requested that remedial action at MFHN be completed concurrent with the remaining remedial activities at Site 186, and that all activities be completed no later than November 2, 2013.

PPG believes this schedule requirement can be met so long as:

- NJDEP approves this RAWP Addendum no later than October 25, 2013;
- MFHN approves this RAWP Addendum, including site access approval for pre-post ex sampling, soil excavation and fence removal, no later than October 28, 2013;
- The pre-post-ex soil samples can be collected on or before October 28;
- The analytical laboratory can provide sample analysis by the afternoon of October 30, 2013.

Site 186 RAWP Addendum Approval

From: [Amin, Prabal](#)
To: [LoPilato, Alfred](#); [David Spader](#); bmcpeak@planningprogress.com
Cc: [Michael McCabe](#); [Thomas M. Gibbons](#); "Cozzi, Tom"; [Doyle, David](#); [Terril, Mark \(terril@ppg.com\)](mailto:Terril.Mark@ppg.com); prins@ppg.com; [Mikaelian, Scott](#)
Subject: RE: Site 186 - RAWP Addendum - MFHN Soil Remediation
Date: Friday, October 25, 2013 2:44:02 PM
Attachments: [image001.gif](#)

On behalf of NJDEP, the final version of the Site 186 RAWP Addendum presented in the e-mail below is acceptable. If you have any questions, please contact me.

Thanks.

Prabal

Prabal N. Amin, P.E.
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From: LoPilato, Alfred [<mailto:Alfred.LoPilato@aecom.com>]
Sent: Friday, October 25, 2013 12:53 PM
To: David Spader; bmcpeak@planningprogress.com; Amin, Prabal
Cc: Michael McCabe; Thomas M. Gibbons; 'Cozzi, Tom'; Doyle, David; Terril, Mark (terril@ppg.com); prins@ppg.com; Mikaelian, Scott
Subject: RE: Site 186 - RAWP Addendum - MFHN Soil Remediation

Team – see the attached revised document (FINAL_Rev1) with Dave Spaders' comments incorporated. Please let me know if you have any questions.

Al.

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From: David Spader [<mailto:dspader@erfs.com>]
Sent: Friday, October 25, 2013 12:40 PM
To: bmcpeak@planningprogress.com; Amin, Prabal
Cc: Michael McCabe; Thomas M. Gibbons; 'Cozzi, Tom'; Doyle, David; LoPilato, Alfred
Subject: RE: Site 186 - RAWP Addendum - MFHN Soil Remediation

Brian - my only comments are:

1. AECOM should include a short explanation of why the investigation of MFHN property was necessary.
2. A copy of the sidewalk closure permit should be provided with the addendum.
3. Change text to indicate that MFHN *will be* notified of the sidewalk closure; instead of *should be*.

David Spader, PG

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From: bmcpeak@planningprogress.com [<mailto:bmcpeak@planningprogress.com>]
Sent: Thursday, October 24, 2013 12:45 PM
To: Amin, Prabal
Cc: Michael McCabe; David Spader; Thomas M. Gibbons; 'Cozzi, Tom'; Doyle, David; LoPilato, Alfred
Subject: FW: Site 186 - RAWP Addendum - MFHN Soil Remediation

Prabal:

I am forwarding the referenced data validation reports provided by AECOM.

Brian McPeak
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From: LoPilato, Alfred [<mailto:Alfred.LoPilato@aecom.com>]
Sent: Thursday, October 24, 2013 12:18 PM
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Cc: McCabe, Michael (jcsiteadministrator@earthlink.net); Terril, Mark; Prins, Keith; Mikaelian, Scott
Subject: RE: Site 186 - RAWP Addendum - MFHN Soil Remediation

Brian – attached is the Data Validation Report for soil samples collected at MFHN. Please forward to Weston/NJDEP so they can include with their RAWP Addendum review.

Thanks.

Al.

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From: Gibbons, Thomas [<mailto:thomas.gibbons@cbi.com>]
Sent: Wednesday, October 23, 2013 7:29 PM
To: bmcpeak@planningprogress.com
Cc: McCabe, Michael (jcsiteadministrator@earthlink.net); Terril, Mark; Prins, Keith; LoPilato, Alfred
Subject: Site 186 - RAWP Addendum - MFHN Soil Remediation

Brian,

As discussed during our JCO Principal's call on Monday, we are providing the attached RAWP Addendum in connection with the remediation of soil on the MFHN property. This addendum also provides a summary of MFHN investigation results.

Please note that MFHN COO, Scott Carey has agreed to work with LeClair Ryan to expand the existing access agreement to include this remediation; however, he requested that we provide the work plan to him as soon as approved by NJDEP. In order to expedite this process, we would like to obtain any comments or conditions from Weston by Friday.

Please let me know if you have any questions or concerns. Thank you, Tom



Thomas M. Gibbons, PMP
PPG Project Manager, NGA Sites

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