

Memorandum

To	Thomas Gibbons (CB&I)	Page	1
CC	Keiht Prins (PPG), Mark Terril (PPG), Scott Mikaelian (AECOM)		
Subject	Site 186 RAWP Addendum - Soil Investigation/Excavation at Metropolitan Family Heath Network		
From	Alfred LoPilato (AECOM)		
Date	September 16, 2013		

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

Tom –

As you know, implementation of the RAWP for Site 186 (947 Garfield Avenue) was initiated on August 19, 2013. The Scope of Work for the remedial action at Site 186 included the excavation of soils impacted with total chromium, hexavalent chromium and/or visible Chromate Chemical Production Waste (CCPW).

During the remedial action, it was discovered that the presence of CCPW material was more widespread on-site than anticipated, and some of the material observed exhibited a visible concentration of CCPW at percentages higher than previously observed. As a result, the remedial action at Site 186 was suspended to allow time for the preparation and approval of revised waste profiles so the material could be properly disposed of at the appropriate waste facilities.

During the remedial action, NJDEP and AECOM (as remediation oversight consultants to PPG) observed visible CCPW material, at generally low concentrations (on a percentage basis), along the southern excavation sidewall adjacent to the Metropolitan Family Health Network (MFHN) property boundary (see Figure 10a attached). The material was generally observed within the top two feet of the sidewall profile, between the top of a former stone building foundation and the asphalt pavement.

Although post-excavation soil sample analytical results indicate that chromium and hexavalent chromium concentrations along this sidewall are below the New Jersey Department of Environmental Protection (NJDEP) Residential Direct Contact Soil Remediation Standard (RDCSR), the presence of visible CCPW material warrants further investigation and remediation, since it appears that this thin layer of CCPW material, which was remediated on the Site 186 side of the property boundary, may extend beyond the boundary (i.e. beyond the existing fence line) and onto the adjacent MFHN property. As a result, NJDEP now requires that an investigation for the presence of CCPW be conducted in this area of the MFHN property. Investigative next-steps are described in detail below:

Initial Investigation:

To further investigate the presence/non-presence of CCPW on the MHFN side of the property boundary, PPG proposes to initially excavate a narrow trench (approximately 3-feet wide) along the property boundary, approximately 3-feet deep, starting at Garfield Avenue and continuing along the fence to the point at which CCPW was no longer observed on Site 186 (see attached Figure 10a). Access would be obtained from Garfield Avenue, through the gate near the NJ Transit bus stop, and we would utilize a small, rubber tire back hoe or mini-excavator to conduct the work to minimize disturbance to the existing grass/landscaping.

Contingency #1:

If actionable concentrations of CCPW are observed along the southern (outer) wall of the initial trench, the initial excavation will be expanded horizontally up to 5-feet to attempt to reach a clean zone.

Contingency #2:

Should CCPW continue to be observed along the expanded outer trench wall, PPG proposes to step further to the south approximately 10-feet and excavate 3 small, stand-alone test pits. If excavation of these test pits indicates no CCPW is present, the trench will be further expanded to complete the remedial action of visible CCPW.

Contingency #3:

If visible CCPW is present in the test pits, then investigation in this area by test pits would be stopped and PPG would proceed with a more comprehensive remedial investigation of the site.

During the investigation all excavated material will be temporarily stockpiled on plastic. If no CCPW is observed, the excavated material will be placed back in the trench/test pit, and the sod replaced.

If CCPW is observed, we will be prepared to remove the material for disposal, collect post-excavation soil samples pursuant to the Site 186 RAWP and NJDEP Guidance (if the limit of CCPW material has been reached), place a liner in the excavation, and backfill with clean fill material, and replace the sod.

At this time, we are not proposing to conduct any investigation/remediation activity beyond the Scope proposed herein. If additional investigation and or remedial action are required on the MFHN property, it will be conducted under a separate Scope of Work to be prepared by PPG and approved by the NJDEP and property owner.

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 these activities. Additionally, temporary fencing fitted with privacy screen will be utilized to secure the work area during excavation activities.

If the presence of CCPW is confirmed, CCPW and related metals will be fully delineated by PPG as described above and a remedial action work plan would be prepared for review and approval by NJDEP.

Post Excavation Confirmation Samples:

Sample ID	Excavation Zone	Sample Type	Sample Depth (Feet)	Analytical
186-Z1B-2.0-2.5	Zone 1	Excavation Bottom	2.0-2.5	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z1S-N-1.0	Zone 1	Sidewall Sample	1	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z1S-W-1.0	Zone 1	Sidewall Sample	1	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z1S-S-1.0	Zone 1	Sidewall Sample	1	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2B-4.0-4.5	Zone 2	Excavation Bottom	4.0-4.5	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2S-W-2.0	Zone 2	Sidewall Sample	2	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2S-NW-2.0	Zone 2	Sidewall Sample	2	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2S-NE-2.0	Zone 2	Sidewall Sample	2	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2S-E-2.0	Zone 2	Sidewall Sample	2	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2S-SE-2.0	Zone 2	Sidewall Sample	2	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z2S-SW-2.0	Zone 2	Sidewall Sample	2	Cr ⁺⁶ , Eh, pH, and CCPW Metals
186-Z3B-2.0-2.5	Zone 3	Excavation Bottom	2.0-2.5	Cr ⁺⁶ , Eh, pH, and CCPW Metals

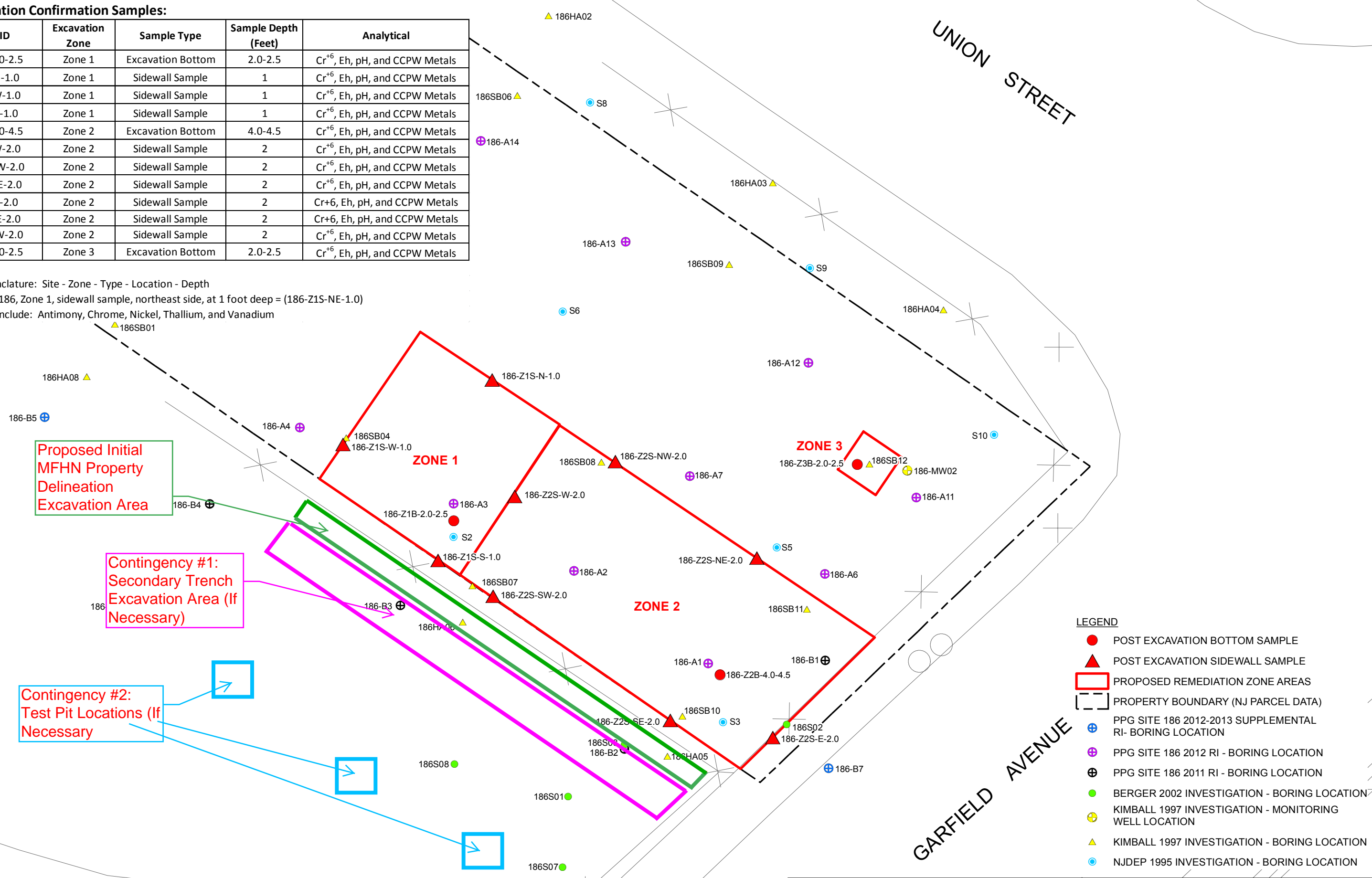
Notes:

Sample Nomenclature: Site - Zone - Type - Location - Depth

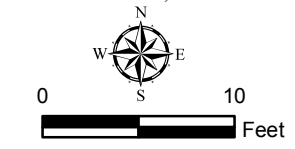
Example: Site 186, Zone 1, sidewall sample, northeast side, at 1 foot deep = (186-Z1S-NE-1.0)

CCPW Metals include: Antimony, Chrome, Nickel, Thallium, and Vanadium

J:\Water\ProjectFiles\5005510_PPG\100_JerseyCity\GIS\Projects\Site_186_Property\Proposed Post-Remediation Samples\Figure 5 Proposed Post-Remediation Samples.mxd



- LEGEND**
- POST EXCAVATION BOTTOM SAMPLE
 - ▲ POST EXCAVATION SIDEWALL SAMPLE
 - ▭ PROPOSED REMEDIATION ZONE AREAS
 - - - PROPERTY BOUNDARY (NJ PARCEL DATA)
 - ⊕ PPG SITE 186 2012-2013 SUPPLEMENTAL RI - BORING LOCATION
 - ⊕ PPG SITE 186 2012 RI - BORING LOCATION
 - ⊕ PPG SITE 186 2011 RI - BORING LOCATION
 - BERGER 2002 INVESTIGATION - BORING LOCATION
 - ⊕ KIMBALL 1997 INVESTIGATION - MONITORING WELL LOCATION
 - ▲ KIMBALL 1997 INVESTIGATION - BORING LOCATION
 - NJDEP 1995 INVESTIGATION - BORING LOCATION

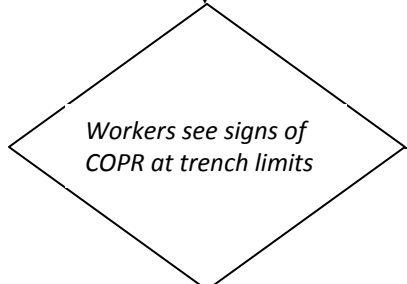


PPG INDUSTRIES
 GARFIELD AVENUE PROJECT AREA, JERSEY CITY
 SITE 186 PROPERTY
 HUDSON COUNTY, NEW JERSEY
 60238842
 Date 9/16/2013

FIGURE 10a
 POST-EX SAMPLING PLAN

Activities to be conducted following September 18th MFHN Board Meeting Authorization

Oct. 5-6: PPG digs 3-foot wide trench on northern side of Metro Family Health Network Property.

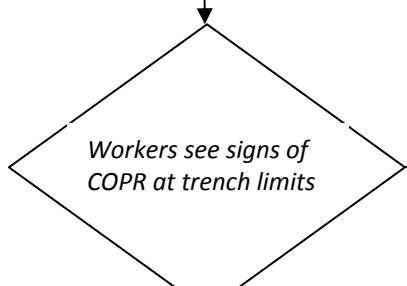


No

Any observed COPR is removed and samples are collected. Trench is closed.

Yes

Oct. 5-6: 3-foot wide trench is expanded to the south by up to an additional 5 feet.

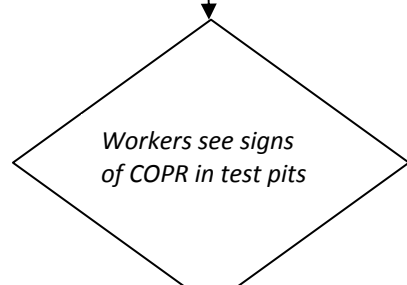


No

Any observed COPR is removed and samples are collected. Trench is closed.

Yes

Oct. 12-13: Three 4' by 4' test pits are installed south of trenching

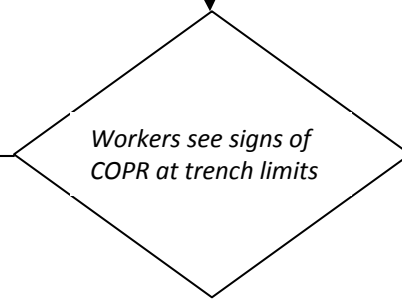


No

Oct. 12-13: Open trench is expanded to the south to attempt to complete COPR removal to the limits of grassy area

Yes

Any observed COPR is removed and samples are collected. Trench and test pits are closed.

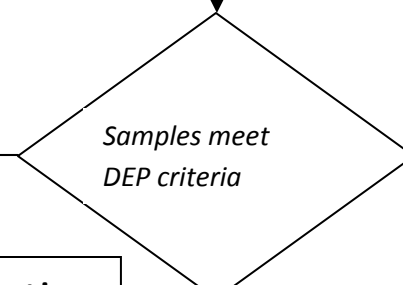


No

Any observed COPR is removed and samples are collected. Trench is closed.

Yes

No



Yes

Report on activities presented to MFHN Board in October Meeting to seek authorization for additional activities if necessary

PPG prepares a scope of work for investigation of entire Metro Family Health Network property.

Remedial Action Complete pending DEP review