

## Memorandum

To Michael McCabe File: 60149955.4010A

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CC Dave Claassen, PPG; Richard Feinberg, AECOM; Scott Mikaelian, AECOM; Mark Terrill, PPG; Brian McPeak, PP, LLC

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Subject PPG Industries, Inc. – Hudson County Chromate Sites 202, 203, and 204

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From Alfred LoPilato and William D. Spronz

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Date January 24, 2011

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AECOM has prepared this DRAFT memorandum on behalf of PPG Industries, Inc. (“PPG”), to present information regarding Hudson County Chromate (“HCC”) Sites 202, 203, and 204 related to the potential presence of Chromate Chemical Processing Waste (“CCPW”) and CCPW-impacted material.

HCC Sites 202, 203, and 204 are located in Jersey City, New Jersey (Figure 1), and are identified by the Jersey City Tax Assessor as follows:

- Chrome Site 202: NJ Transit Parcel No. 205, Group 1, Communipaw Shop and Yard, Tax Block 2033 current Lot 13, **old Lot 7** (Figure 2)
- Chrome Site 203: NJ Transit Parcel No. 76, Claremont Associates Tax Block 1781, Lot A1 (Figure 3)
- Chrome Site 204: NJ Transit Parcel No. 5E Tax Block 2145, current Lots 62 and 41.C.99, **old Lots 41C, 56, & 62** (Figure 4)

Inquiries to the NJDEP and a records search indicated that the Sites were added to the NJDEP list of HCC sites based upon the results of environmental investigations conducted by BEM Systems (“BEM”) for the construction of the New Jersey Transit’s (“NJT”) Hudson-Bergen Light Rail line (“Light Rail”). Each Site was added to the NJDEP’s HCC list based upon one or two soil samples where the analytical results for hexavalent chromium (“Cr<sup>+6</sup>”) exceeded the interim NJDEP Cr<sup>+6</sup> chromium soil cleanup criteria (“CrSCC”) of 10 milligrams per kilogram (“mg/kg”) that was in effect at the time the work was done. NJDEP’s current interim CrSCC for Cr<sup>+6</sup> is 20 mg/kg.

Information regarding these three sites was provided by the following sources:

- NJDEP Chrome Site Database (Table 1)
- NJDEP File Review
- Light Rail MOS-1 Group 1, Group 1A, and Group 3 RIRs by BEM
- Hard copy version of the Light Rail MOS-1 Electronic Remedial Action Report (“eRAR”) by BEM
- Additional data provided by BEM and discussions with BEM
- Discussion with Anthony Findley, NJDEP Case Manager for the Light Rail

This information indicated the following:

- The areas assigned to PPG for chrome sites 202, 203, and 204 were investigated by NJ Transit in accordance with the Technical Requirements for Site Remediation
- $\text{Cr}^{+6} > 10 \text{ mg/kg}$  was reported in isolated portions of sites 202, 203, and 204
- Additional delineation to define the limits of  $\text{Cr}^{+6}$  was conducted on sites 202 and 203
- $\text{Cr}^{+6} > 10 \text{ mg/kg}$  on sites 202 and 203 was remediated by excavation and off-site disposal
- Post-excavation sampling confirmed that no  $\text{Cr}^{+6} > 10 \text{ mg/kg}$  remains on sites 202 and 203
- The  $\text{Cr}^{+6}$  detected on Site 204 is  $<$  the current CrSCC of 20 mg/kg. No  $\text{Cr}^{+6} >$  the current CrSCC of 20 mg/kg remains on Site 204
- The  $\text{Cr}^{+6}$  detected on Site 204 may be related to neighboring chrome sites 91, 92, and 165

AECOM spoke with Anthony Findley, the NJDEP Case Manager for the Light Rail project, on December 9, 2010. Mr. Findley indicated that a no further action (“NFA”) determination for the Light Rail corridor is pending and will soon be approved. He stated that this NFA determination will include chrome Sites 202 and 203, where  $\text{Cr}^{+6}$  was previously delineated, excavated, and remediated by others. We understand that, prior to NFA determinations on the HCC sites, that the lots and blocks and site boundaries need to be confirmed; this memo provides that information. Mr. Findley also mentioned that a deed notice was also approved by NJDEP for soil in the Light Rail right-of-way and a Classification Exception Area (“CEA”) was approved for groundwater. A copy of the conditional eRAR and deed notice approval letter for the Light Rail, including sites 202 and 203, is included as Attachment A.

The following sections provide additional information and recommendations for these three HCC sites:

#### Site 202

HCC Site 202 is associated with NJ Transit property Parcel Number 205 and was previously owned by Caven Point Realty. It is located on Tax Block 2033, Lot 7. Site 202 was deemed to be an HCC site by NJDEP based upon the results of analysis of two soil samples that exceeded the former CrSCC of 10 mg/kg. The boring locations and sampling results are presented in Figure 5 and Table 2.

The sample locations, depths, and analytical results for samples that exceeded the former CrSCC of 10 mg/kg are summarized in the table below:

Boring ID	Contaminant of Concern	Depth of Contaminant of Concern	Analytical Result (mg/kg)	Former CrSCC (mg/kg)	Current CrSCC (mg/kg)
G01-B77A	Hexavalent Chromium	0' – 1.5'	12.8	10	20
G01-B13A	Hexavalent Chromium	0' – 2'	23.3	10	20

The areas where these samples were collected were excavated and the materials transported offsite for disposal. A total of 12.2 cubic yards of material were excavated from the area surrounding boring G01-B77 and 8.3 cubic yards of material were excavated from the area surrounding boring G01-B13. Both of these excavations were completed on August 7, 1997. Post-excavation sampling was completed to verify that the remediation had been successfully conducted. Post-excavation Cr<sup>+6</sup> concentrations ranged from not detected (“ND”) to 4.4 mg/kg, well below the current CrSCC. None of the post-excavation samples exceeded the former 10 mg/kg or the current 20 mg/kg CrSCC. Therefore no further action is recommended for HCC Site 202.

#### Site 203

HCC Site 203 is associated with NJ Transit property Parcel Number 76 and is currently owned by 346 Claremont Associates. It is located at the corner of Westside Avenue and Claremont Avenue in a commercial and residential area of Jersey City on Tax Block 1781, Lot A1, currently occupied by the Jersey City Board of Education. Site 203 was deemed a HCC by NJDEP based upon the results of analysis of two soil samples that exceeded the former CrSCC of 10 mg/kg. The boring locations and sampling results are presented in Figure 6 and Table 3.

The sample locations, depths, and analytical results for samples that exceeded the former CrSCC of 10 mg/kg are summarized in the table below:

Boring ID	Contaminant of Concern	Depth of Contaminant of Concern	Analytical Result (mg/kg)	Former CrSCC (mg/kg)	Current CrSCC (mg/kg)
G03-B58A	Hexavalent Chromium	0' – 1.5'	17	10	20
G03-DB100.30A	Hexavalent Chromium	2' – 4'	12.5	10	20

The areas where these samples were collected were excavated and the materials transported offsite for disposal. A total of 17 cubic yards of material was excavated from the areas surrounding borings G03-DB58A and G03-DB100.30A. Both of these excavations were completed in September, 1997. Post-excavation sampling was completed to verify that the remediation had been successfully conducted. None of the post-excavation samples exceeded the former 10 mg/kg or the current 20 mg/kg CrSCC. Therefore no further action is recommended for HCC Site 203.

#### Site 204

HCC Site 204 is associated with NJ Transit property Parcel Number 5E and was previously owned by Conrail as part of its Edgewater Branch. At the time the site was deemed an HCC site by NJDEP, the overall area of the parcels included approximately 7-acres. The current configuration of the parcels totals approximately 9-acres.

Site 204 was deemed an HCC site by NJDEP based upon the results of analysis of three soil samples that exceeded the former CrSCC of 10 mg/kg. The Cr<sup>+6</sup> concentrations for these three samples, and all other samples collected at this site, are all below the current CrSCC of 20 mg/kg.

Boring ID	Contaminant of Concern	Depth of Contaminant of Concern	Analytical Result (mg/kg)	Former CrSCC (mg/kg)	Current CrSCC (mg/kg)
G01A-B09B	Hexavalent Chromium	2' – 3.5'	14.7	10	20
G01A-B09D	Hexavalent Chromium	8' – 9.5'	11.2	10	20
G01A-B10C	Hexavalent Chromium	4' – 5.5'	12.2	10	20

These samples were collected as part of a larger investigation conducted by BEM systems in mid-1990's, which included advancement of a total of 18 soil borings and the collection of 36 soil samples at Site 204. Of the 33 soil samples analyzed for hexavalent chromium, no results exceed the current CrSCC of 20 mg/kg. A map illustrating these boring locations is included as Figure 4. Table 4 presents the hexavalent and total chromium results from the BEM investigation.

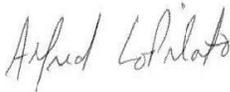
Based upon the number of soil borings advanced, and the overall acreage of the parcels, BEM advanced approximately 2 soil borings per acre of land. This frequency exceeds the NJDEP minimum standard, as defined at NJAC 7:26E-3.9 (f), which requires a minimum of one sample for every two acres at properties less than 10-acres in size.

Based on the frequency and location of the borings advanced, the overall number of samples collected and analyzed, and the analytical results, PPG proposes no further action for Site 204 with regard to additional investigation of chromium issues, and also requests that Site 204 be removed from the NJDEP's HCC list.

Please note that the data presented in this memorandum were compiled from various hard copy and electronic files provided by BEM from their archived project files. A full electronic summary of the data collected along the Light Rail Corridor including HHC sites 202, 203, and 204 is available in the eRAR that BEM provided to NJDEP. NJ Transit and BEM cannot provide this electronic version of this eRAR with the full set of analytical data to AECOM and PPG due to homeland security issues. NJDEP currently possesses the electronic version of the eRAR and will be able to verify the analytical results presented in this memo for all three of these HHC sites.

Please call or e-mail if you have any questions or would like to discuss this matter further.

Sincerely yours,



**Alfred LoPilato**

Project Manager

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**William D. Spronz**

RI Lead

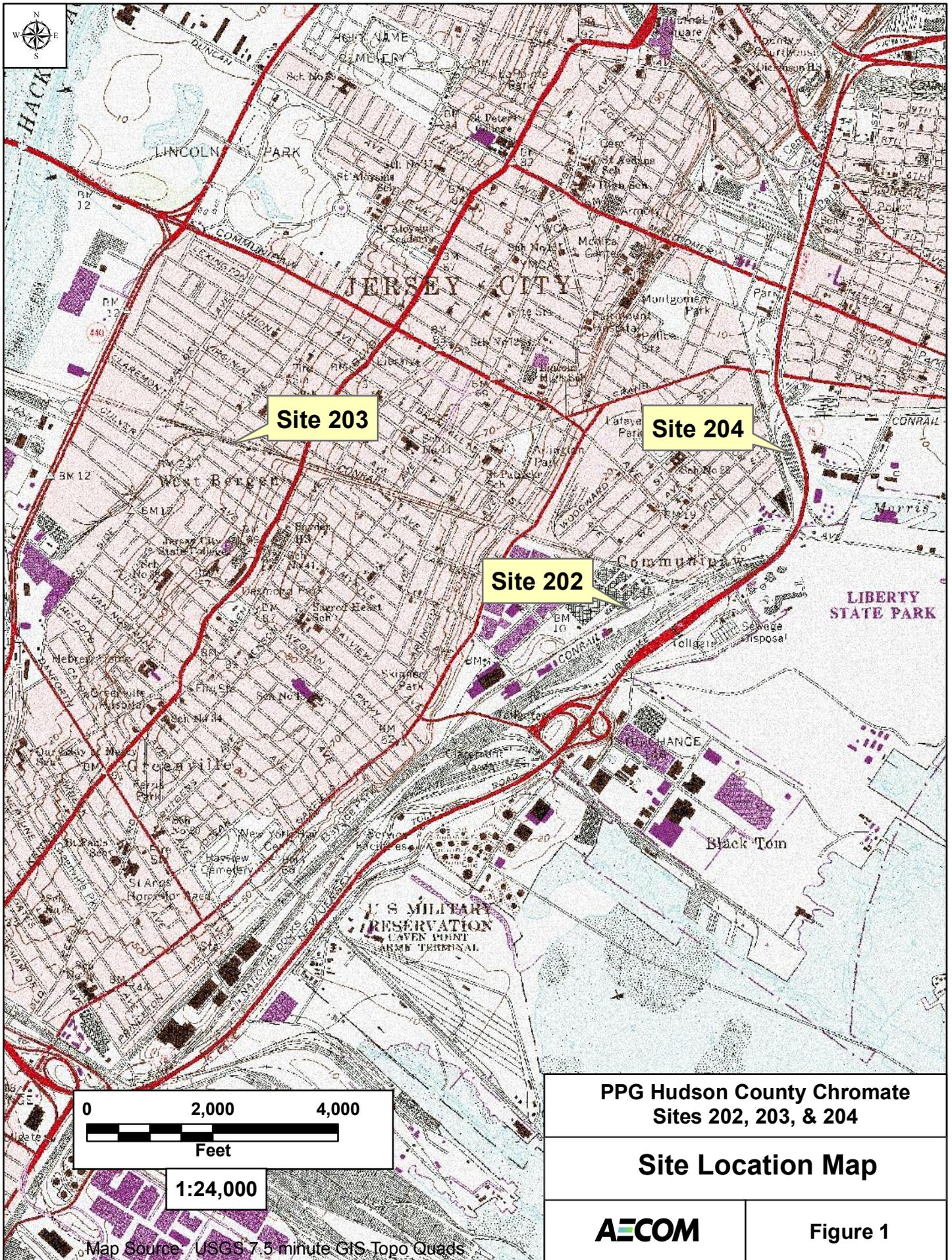
732-564-3917

[bill.spronz@aecom.com](mailto:bill.spronz@aecom.com)

WDS/ajl

Enclosures: Figure 1 through 6  
Tables 1 through 4  
Attachment A

# **ATTACHMENT A**



PPG Hudson County Chromate  
Sites 202, 203, & 204

**Site Location Map**

**AECOM**

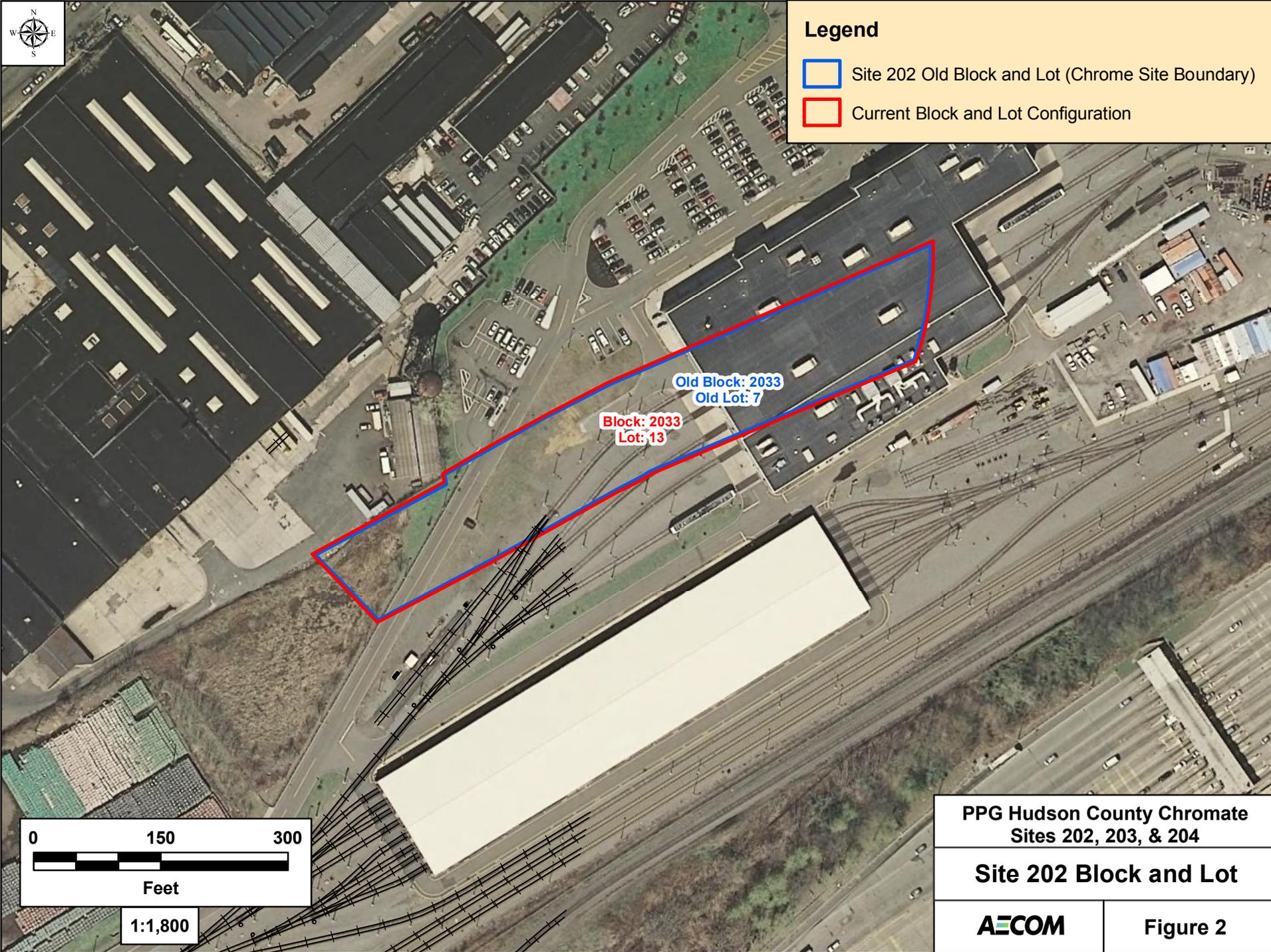
Figure 1

Map Source: USGS 7.5 minute GIS Topo Quads



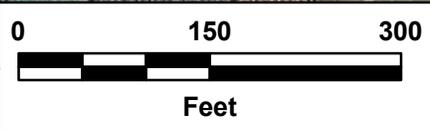
**Legend**

-  Site 202 Old Block and Lot (Chrome Site Boundary)
-  Current Block and Lot Configuration



Old Block: 2033  
Old Lot: 7

Block: 2033  
Lot: 13



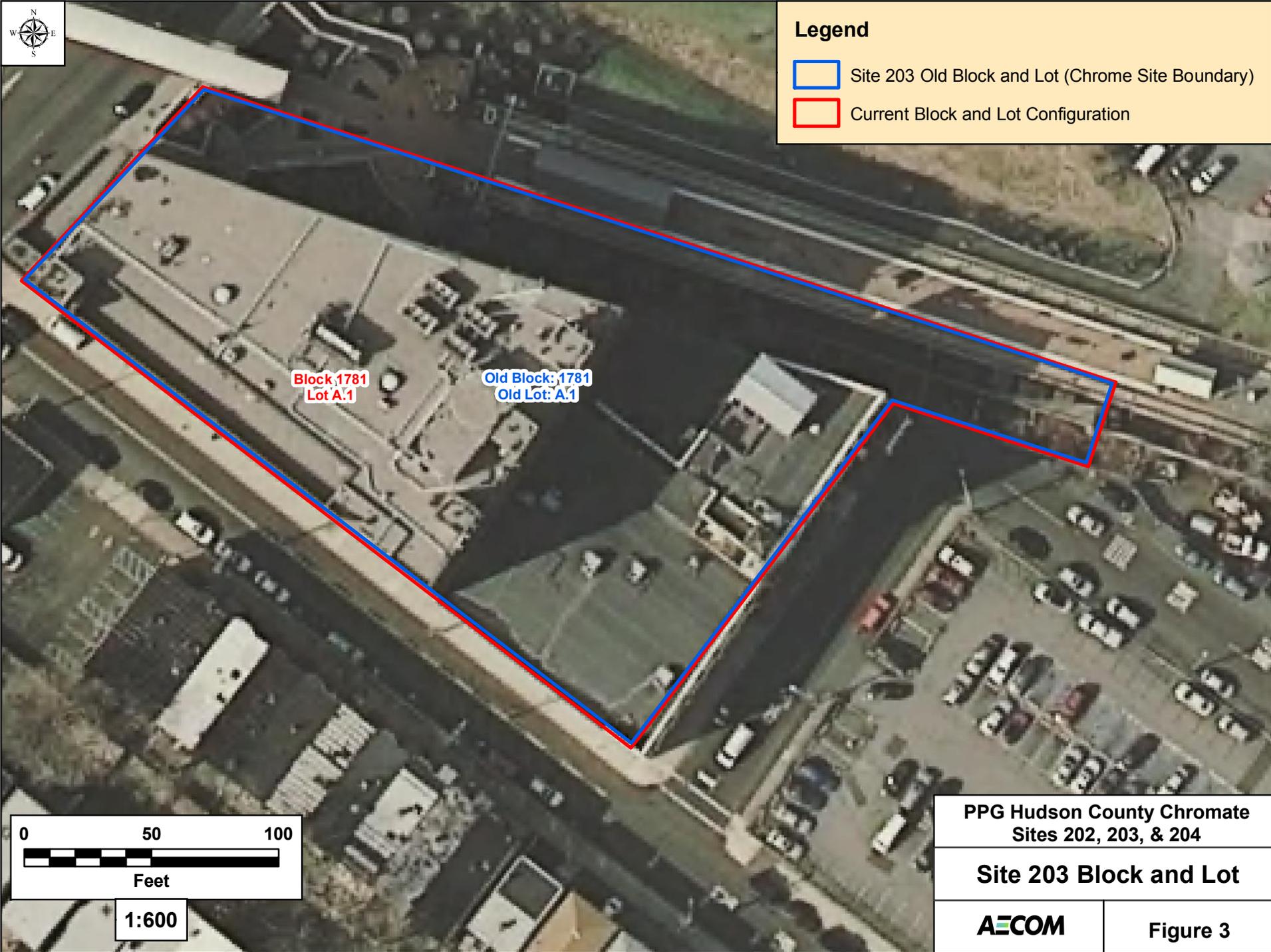
1:1,800

PPG Hudson County Chromate  
Sites 202, 203, & 204

Site 202 Block and Lot

**AECOM**

Figure 2

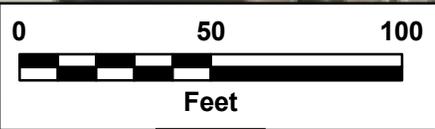


**Legend**

-  Site 203 Old Block and Lot (Chrome Site Boundary)
-  Current Block and Lot Configuration

Block 1781  
Lot A.1

Old Block: 1781  
Old Lot: A.1



1:600

PPG Hudson County Chromate  
Sites 202, 203, & 204

Site 203 Block and Lot

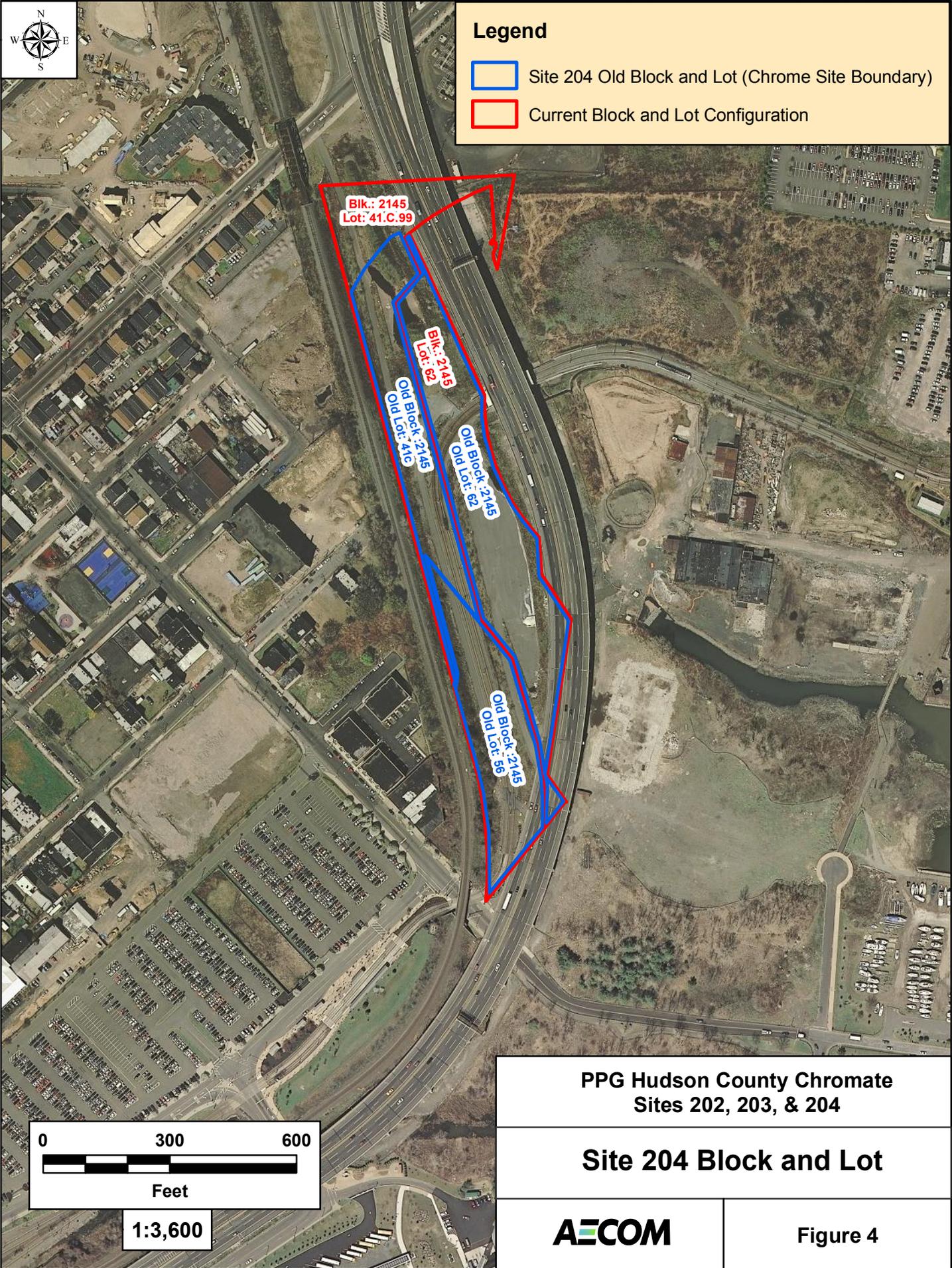
**AECOM**

Figure 3



**Legend**

-  Site 204 Old Block and Lot (Chrome Site Boundary)
-  Current Block and Lot Configuration

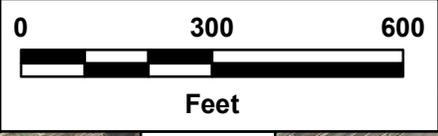


PPG Hudson County Chromate  
Sites 202, 203, & 204

Site 204 Block and Lot



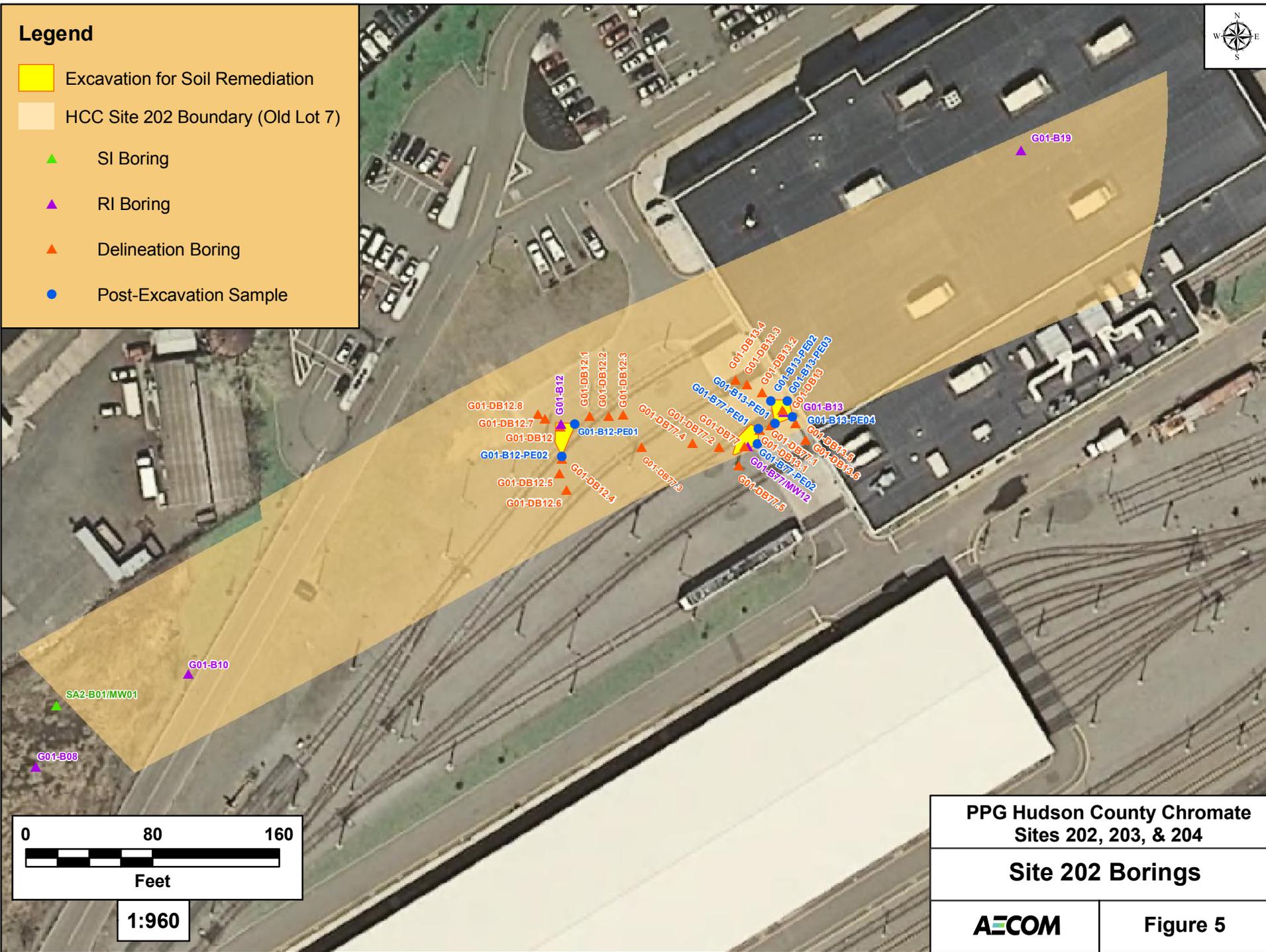
Figure 4



1:3,600

### Legend

- Excavation for Soil Remediation
- HCC Site 202 Boundary (Old Lot 7)
- SI Boring
- RI Boring
- Delineation Boring
- Post-Excavation Sample



PPG Hudson County Chromate  
Sites 202, 203, & 204

Site 202 Borings

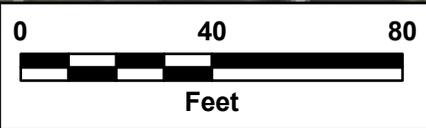
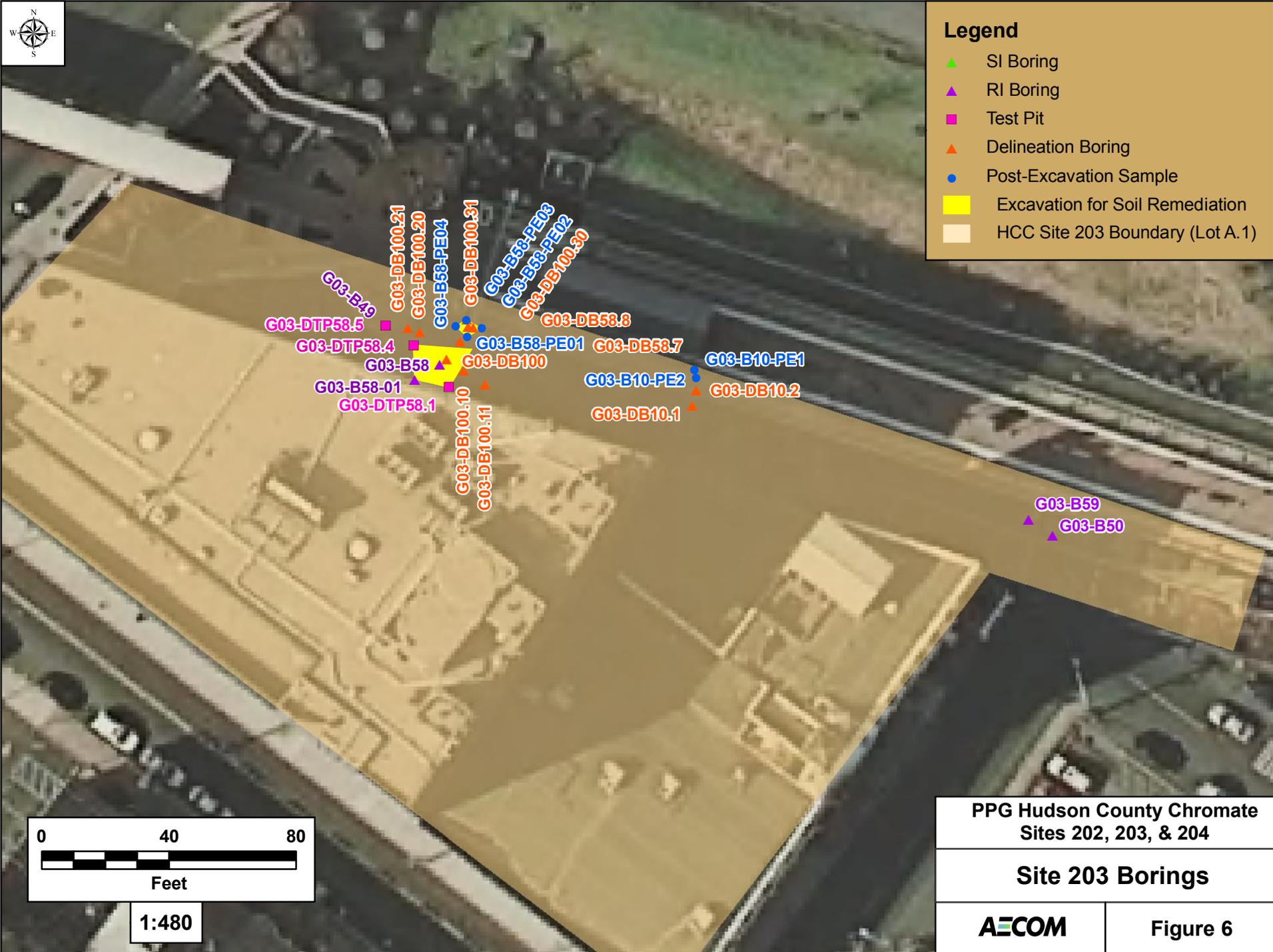
**AECOM**

Figure 5



### Legend

- ▲ SI Boring
- ▲ RI Boring
- Test Pit
- ▲ Delineation Boring
- Post-Excavation Sample
- Excavation for Soil Remediation
- HCC Site 203 Boundary (Lot A.1)



1:480

PPG Hudson County Chromate  
Sites 202, 203, & 204

**Site 203 Borings**

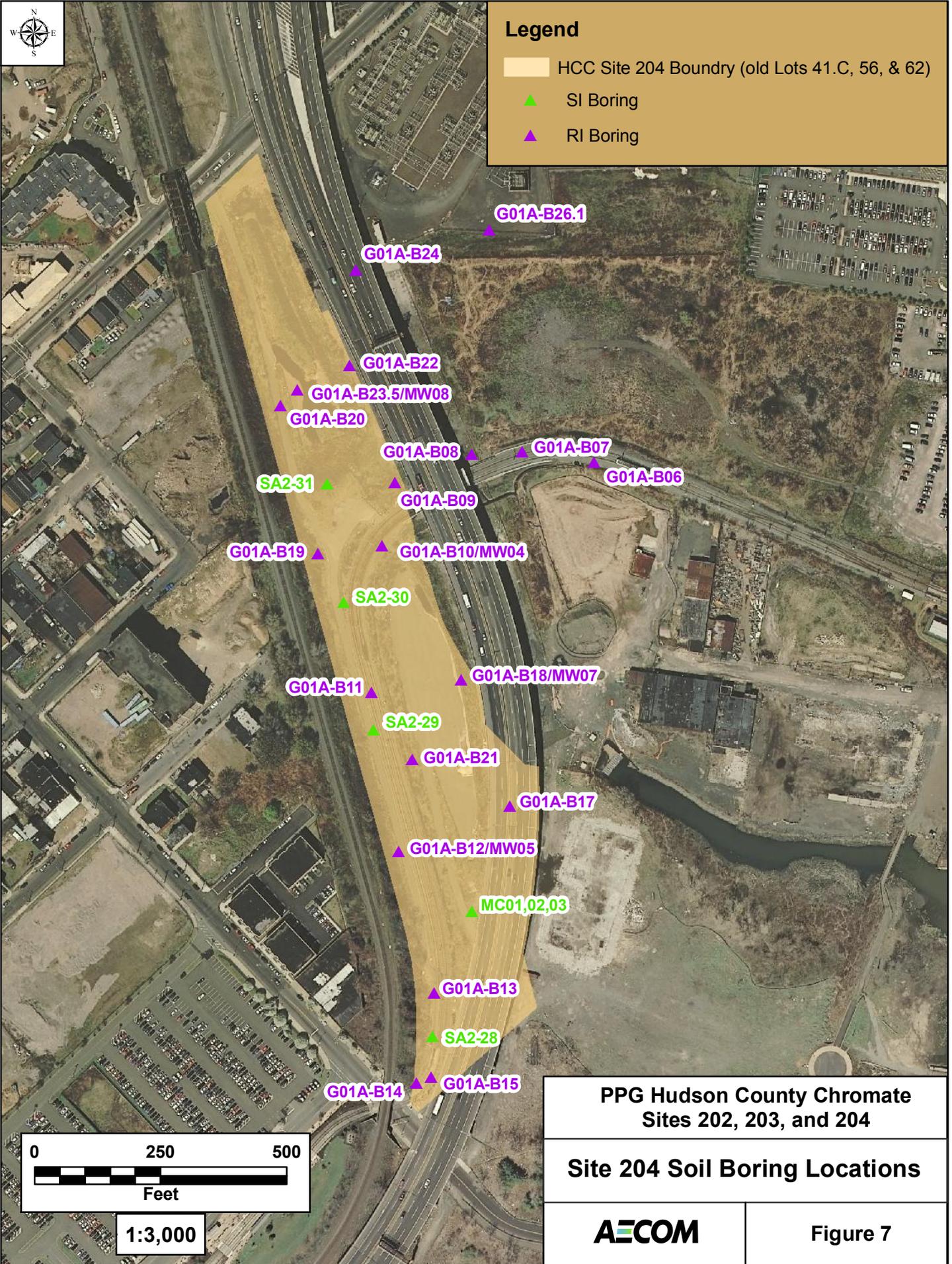
**AECOM**

**Figure 6**



### Legend

- HCC Site 204 Boundry (old Lots 41.C, 56, & 62)
- SI Boring
- RI Boring



G01A-B26.1

G01A-B24

G01A-B22

G01A-B23.5/MW08

G01A-B20

G01A-B08

G01A-B07

G01A-B06

SA2-31

G01A-B09

G01A-B19

G01A-B10/MW04

SA2-30

G01A-B18/MW07

G01A-B11

SA2-29

G01A-B21

G01A-B17

G01A-B12/MW05

MC01,02,03

G01A-B13

SA2-28

G01A-B14

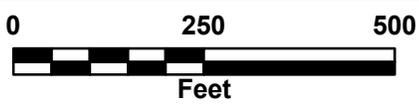
G01A-B15

PPG Hudson County Chromate Sites 202, 203, and 204

Site 204 Soil Boring Locations

AECOM

Figure 7



1:3,000

**Table 1**  
**NJDEP Chrome Site Database Entries for Sites 202, 203, and 204**  
**Provided by NJDEP in August 2010**

Into_NJEMS	In_KCS_NJ	Pref ID	SA_Status	SITE #	SITE NAME	STREET	TOWN	BLOCK	LOT	ACTIVE
TRUE	TRUE	G000044583	ATP 08/02/2000 checked March 2006	202	Caven Point Realty	Between Pacific Street and NJ	Jersey City	2033	7	Yes
TRUE	TRUE	G000044584	ATP 08/02/2000 checked March 2006	203	346 Claremont Associates	NJ Transit Light Rail, 200' East of West Side Avenue	Jersey City	1781	A1	Yes
TRUE	TRUE	G000044585	ATP 08/02/2000 checked March 2006	204	Conrail Edgewater Branch	West side of NJ Turnpike at the foot of Monitor Street	Jersey City	2145	41C, 56 & 62	Yes

**Table 1**  
**NJDEP Chrome Site Database Entries for Sites 202, 203, and 204**  
**Provided by NJDEP in August 2010**

SITE #	SITE NAME	LEAD	MANAGER	LAND USE	COMMENT	IRM	Site Category
202	Caven Point Realty	BSM	Wallace	Industrial	Site identified during the RI of NJTRANSIT in the delineation of their Light Rail Transit Project. (PPG & OCC Offer)	none	Industrial
203	346 Claremont Associates	BSM	Wallace	Industrial	Site identified during the RI of NJTRANSIT in the delineation of their Light Rail Transit Project. (PPG & OCC Offer)		Industrial
204	Conrail Edgewater Branch	BSM	Wallace		Site identified during the RI of NJTRANSIT in the delineation of their Light Rail Transit Project. (PPG & OCC Offer)		Industrial

**Table 1**  
**NJDEP Chrome Site Database Entries for Sites 202, 203, and 204**  
**Provided by NJDEP in August 2010**

SITE #	SITE NAME	Nexus	RP Category	Sampling Result	WHEN	Samplers	Status	Orphan Priority
202	Caven Point Realty	NJ Transit. Proximity to PPG Plant. Lawrence Construction. PROPOSED ASSIGNMENT: PPG / Occidental Acceptance (7/21/2006 letter).	NJDEP Orphan Site #2	23.3 ppm Cr6	1996	BEM Systems	RI	Medium
203	346 Claremont Associates	NJ Transit. Lawrence Construction. Proximity to PPG Plant. PROPOSED ASSIGNMENT: PPG / Occidental Acceptance (7/21/2006 letter).	NJDEP Orphan Site #2	17 ppm Cr6	1996	BEM Systems	RI	Low
204	Conrail Edgewater Branch	NJ Transit. Proximity to PPG Plant. No nexus. PROPOSED ASSIGNMENT: PPG / Occidental Acceptance (7/21/2006 letter).	NJDEP Orphan Site #2	14.7 ppm Cr6	1996	BEM Systems	RI	Low

**Table 2**  
**Hudson County Chrome Site 202**  
**NJ Transit Light Rail Remedial Investigation**  
**Soil Analytical Results in mg/kg**

Boring ID	Sample ID	Cr <sup>+6</sup> Result	Total Cr Result
G01-B08	G01-B08B	NA	73.7
	G01-B08D	NA	45.3
G01-B10	G01-B10B	NA	20.8
	G01-B10D	NA	18.5
G01-B12	G01-B12B	NA	130
	G01-B12D	NA	43.8
G01-B13	G01-B13A	23.3	44.7
	G01-B13C	NA	18.3
G01-B13-PE01	G01-B13-PE01	2.5 ULN	NA
G01-B13-PE02	G01-B13-PE02	2.4 ULN	NA
G01-B13-PE03	G01-B13-PE03	2.4 BLN	NA
G01-B13-PE04	G01-B13-PE04	2.5 ULN	NA
G01-B77/MW12	G01-B77A	12.8 N	58
	G01-B77C	1.2 U	10.2
	G01-B77D	5.8	34.4
G01-B77-PE01	G01-B77-PE01	2.6 BNL	NA
G01-B77-PE02	G01-B77-PE02	2.4 UNL	NA
G01-DB12.1	G01-DB12.1A	4.6	NA
G01-DB12.2	G01-DB12.2A	5.9	NA
G01-DB12.3	G01-DB12.3A	9.7	NA
G01-DB13	G01-DB13B (12/31/96)	1.7 U	NA
	G01-DB13B (02/07/97)	2.4 U	NA
G01-DB13.1	G01-DB13.1A	4.4	NA
	G01-DB13.1B	4.1	NA
G01-DB13.2	G01-DB13.2A	1.2 U	NA
	G01-DB13.2B	1.2 U	NA
G01-DB13.3	G01-DB13.3A	1.3 U	NA
	G01-DB13.3B	1.3 U	NA
G01-DB13.4	G01-DB13.4A	1.1 U	NA
	G01-DB13.4B	1.2 U	NA
G01-DB13.5	G01-DB13.5A	2.5 U	NA
	G01-DB13.5B	2.6 U	NA
G01-DB13.6	G01-DB13.6A	4.6	NA
	G01-DB13.6B	3.2 U	NA
G01-DB77	G01-DB77	1.5 U	
G01-DB77.1	G01-DB77.1A	1.3 U	NA
	G01-DB77.1B	1.3 U	NA
G01-DB77.2	G01-DB77.2A	1.3 U	NA
	G01-DB77.2B	1.4 U	NA
G01-DB77.3	G01-DB77.3A	1.3 U	NA
	G01-DB77.3B	1.6 U	NA
G01-DB77.4	G01-DB77.4A	1.3 U	NA
	G01-DB77.4B	2.3 U	NA
G01-DB77.5	G01-DB77.5A	3 NJ	NA
	G01-DB77.5B	2.5 UNJ	NA
G01-DB77.6	G01-DB77.6A	2.5 UNJ	NA
	G01-DB77.6B	2.8 UNJ	NA
SA2-B01/MW01	SA2-B01A	NA	41.1 *NJ
	SA2-B01B	NA	12.3 *NJ

**Data Qualifiers:**

- B: Reported value is between contract required detection limit and instrument detection limit, therefore the result is estimated
- E: Inductively coupled plasma (ICP) serial dilution result not within control limits or furnace atomic absorption (AA) interference present
- J: Result is an estimated concentration
- L: Result is likely biased low, therefore the result is estimated
- N: Spiked Sample not within control limits, therefore the result is estimated
- U: Analyte analyzed for but undetected at the corresponding detection limit
- \*: Duplicate analysis not within control limits, therefore result is estimated
- NA: Not Analyzed for this compound

**Table 3**  
**Hudson County Chrome Site 203**  
**NJ Transit Light Rail Remedial Investigation**  
**Soil Analytical Results in mg/kg**

Boring ID	Sample ID	Cr <sup>+6</sup> Result	Total Cr Result
G03-B10	G03-B10A	NA	103 NJ
	G03-B10B	NA	14.9 NJ
G03-B49	G03-B49B	3.6	51.2
	G03-B49C	4.7	15.8
G03-B50	G03-B50B	1.4 B	15.5
	G03-B50C	1 B	11
G03-B58-01	G03-B58-01	4.2 NL	100 N
	G03-B58-01A	2.4 BN	14.4 *J
G03-B58	G03-B58A	17 NJ	711 N
G03-B58-PE01	G03-B58-PE01	0.457 UNJ	NA
G03-B58-PE02	G03-B58-PE02	2.7 UNJ	NA
G03-B58-PE03	G03-B58-PE03	1.7 BNUJ	NA
G03-B58-PE04	G03-B58-PE04	2.2 BNUJ	NA
G03-B59	G03-B59A	8.6 NJ	53.5
G03-B59-PE01	G03-B59-PE01	2.3 UNL	NA
G03-B59-PE02	G03-B59-PE02	2.6 UNL	NA
G03-DB100.10	G03-DB100.10A	3.2 NL	NA
	G03-DB100.10B	1.2 BLN	NA
G03-DB100.11	G03-DB100.11A	0.73 BLN	NA
	G03-DB100.11B	4.5 NL	NA
	G03-DB100.11C	1.8 BLN	NA
G03-DB100.20	G03-DB100.20A	0.72 BLN	NA
	G03-DB100.20B	0.27 ULN	NA
	G03-DB100.20C	0.39 ULN	NA
G03-DB100.21	G03-DB100.21A	1.3 BLN	NA
	G03-DB100.21B	1.9 BLN	NA
G03-DB100.30	G03-DB100.30A	2.9 NL	NA
	G03-DB100.30B	12.5 NL	NA
	G03-DB100.30C	2 BLN	NA
G03-DB100.30-PE01	G03-DB100.30-PE01	2.4 NUJ	NA
G03-DB100.31	G03-DB100.31A	2.8 NL	NA
	G03-DB100.31B	1.5 BLN	NA
	G03-DB100.31C	0.40 ULN	NA
G03-DB100	G03-DB100B	-0.06 ULN	NA
G03-DB58.7	G03-DB58.7A	1.9 BLN	NA
	G03-DB58.7B	2.4 ULN	NA
G03-DB58.8	G03-DB58.8A	2.3 NL	NA
	G03-DB58.8B	0.74 BLN	NA
G03-DTP58.1	G03-DTP58.1A	1.1 U	NA
	G03-DTP58.1B	1.2 U	NA
G03-DTP58.4	G03-DTP58.4A	1.2 U	NA
	G03-DTP58.4B	1.1 U	NA
G03-DTP58.5	G03-DTP58.5A	1.2 U	NA
	G03-DTP58.5B	1.2 U	NA
G03-DTP58	G03-DTP58B	1.2 U	NA

**Data Qualifiers:**

- B: Reported value is between contract required detection limit and instrument detection limit, therefore the result is estimated
- E: Inductively coupled plasma (ICP) serial dilution result not within control limits or furnace
- J: Result is an estimated concentration
- L: Result is likely biased low, therefore the result is estimated
- N: Spiked Sample not within control limits, therefore the result is estimated
- U: Analyte analyzed for but undetected at the corresponding detection limit
- \*: Duplicate analysis not within control limits, therefore result is estimated
- NA: Not Analyzed for this compound

**Table 4**  
**Hudson County Chrome Site 204**  
**NJ Transit Light Rail Remedial Investigation**  
**Soil Analytical Results in mg/kg**

Boring ID	Sample ID	Cr <sup>+6</sup> Result	Total Cr Result
G01A-B06	G01A-B06B	1.3 U	10.7
	G01A-B06D	2.7 U	28.2
G01A-B07	G01A-B07A	6.7	53.8
	G01A-B07C	2.9 U	50
	G01A-B07D	2.2 U	56.2
G01A-B08	G01A-B08B	9.4	70.8
	G01A-B08D	14.8	99.5
G01A-B09	G01A-B09B	14.7	76 EJ
	G01A-B09D	11.2	60.2 EJ
G01A-B10/MW04	G01A-B10A	4.5	18.4 EJ
	G01A-B10C	12.2	10.1 EJ
	G01A-B10D	1.2 U	16.8 EJ
G01A-B11	G01A-B11B	3.9	10.2 EJ
	G01A-B11D	3.9	22.1 EJ
G01A-B12/MW05	G01A-B12A	4.9	28.1 EJ
	G01A-B12C	1.2 U	10.5 EJ
	G01A-B12D	1.2 U	10.2 EJ
G01A-B13	G01A-B13B	1.2 U	6 EJ
	G01A-B13D	2.4	12.4 EJ
G01A-B14	G01A-B14A	5.8	34.3 EJ
	G01A-B14C1	5.9	20.1 EJ
G01A-B15	G01A-B15C	1.1	10.7 EJ
	G01A-B15D	3.7	18.9 EJ
G01A-B17	G01A-B17B	1.1 U	14.7
	G01A-B17D	1.2 U	13.8
G01A-B18/MW07	G01A-B18A	1.6	23.1 J
	G01A-B18C	7.1	52.3 J
	G01A-B18D	1.4 U	21 J
G01A-B19	G01A-B19A	5.1	40.5
	G01A-B19C	1.1 U	12.2
G01A-B20	G01A-B20B	2.6	25
	G01A-B20D	1.4 U	11.3
G01A-B21	G01A-B21B	1.2 U	19.2
	G01A-B21D	1.3 U	11.6
G01A-B22	G01A-B22A	4.6	52.5
	G01A-B22C	1.2 U	24.9
G01A-B23/MW08	G01A-B23.3A	1.9	27.3
	G01A-B23.5C	3.9	51
	G01A-B23.5D	1.8 U	35.9
G01A-B24	G01A-B24B	1.1 U	6.8 J
	G01A-B24D	2.9 U	33 J
G01A-B26.1	G01A-B26.1A	4.3	63.2 J
	G01A-B26.1C	1.4	35.7 J
MC01, 02, 03	MC01, 02, 03	0.5 B	247
SA2-28	SA2-28	NA	20.6
SA2-29	SA2-29	NA	29.9
SA2-30	SA2-30	5.1	46.4
SA2-31	SA2-31	NA	27.9

**Data Qualifiers:**

- E: Inductively coupled plasma (ICP) serial dilution result not within control limits or furnace atomic absorption (AA) interference present
- J: Result is an estimated concentration
- U: Analyte analyzed for but undetected at the corresponding detection limit
- NA: Not Analyzed for this compound

# ATTACHMENT A



State of New Jersey  
Department of Environmental Protection

Richard J. Codey  
Acting Governor

Bradley M. Campbell  
Commissioner

May 2, 2005

Mr. Nicholas L. Marton, MRH  
New Jersey Transit  
Program Manager – Engineering, Construction & Environmental Compliance  
Office of New Rail Construction  
One Penn Plaza East  
Newark, New Jersey 07105-2246

**Re: River Line (Formerly New Jersey Light Rail Transit System)  
Hudson Bergen Light Rail Transit System – MOS 1  
Electronic – Remedial Action Reports**

Dear Mr. Marton:

The New Jersey Department of Environmental Protection (Department) has completed its review on the electronic-Remedial Action Reports (e-RARs) submitted for the River Line (Formerly Southern New Jersey Light Rail Transit System) and the Hudson Berger Light Rail Transit System –MOS1 (HBLRTS-MOS1) both dated October 2004 for the respective New Jersey Transit projects. BEMS Systems, Inc., on behalf of the New Jersey Transit Corporation (NJ TRANSIT), prepared these documents. The e-RARs were prepared pursuant to the terms and conditions of the Memorandum of Agreement (MOA) between NJ TRANSIT and the Department for the River Line and for the HBLRTS-MOS1 right-of-way, dated October 25, 1996 and April 20, 1992 respectively to document and certify that the selected remedial actions for the respective projects have been implemented in accordance to the approved Remedial Action Workplans.

**I. River Line (Formerly Southern New Jersey Light Rail Transit System)**

The e-RAR for the River Line project and the final draft deed notice for sites in Camden, Burlington and Mercer Counties are hereby approved. You may now proceed with filing the final deed notice with the Camden, Burlington and Mercer Counties Recording Office.

**II. Hudson Bergen Light Rail Transit System –MOS 1**

The e-RAR for the HBLRTS-MOS1 and final draft deed notice for the sites in MOS-1 segment right-of-way are also hereby approved. You may now proceed with filing the final deed notice with the Hudson County Recording Office. However, the proposed administrative Classification Exception Area (CEA) with the NFA for the sites in MOS-1 segment right-of-way is **only** conditionally

approved provided the followings are satisfactorily clarify, addressed or completed:

1. NJ Transit agrees to conduct ground water remediation at the 34<sup>th</sup> Street Station Park and Ride. This proposal is acceptable. NJ Transit must submit a remedial action workplan detailing the remediation proposal. The park and ride, which is located at the former Hicor Property, has free product and high concentrations of BTEX (i.e. 10200 ppb benzene, 5800 ppb toluene, 2500 ppb ethylbenzene and 5300 ppb xylene).
2. A CEA with NFA for ground water is proposed for all properties acquired for the MOS-1 section with the exception of the Hicor property. This is conditionally acceptable. The Department has questions about 2 of the acquired sites: the Eden Woods property and the Y & T property.

In May 1998 the Department approved BEM's proposal to install 3 monitoring wells at the Eden Wood property to assess ground water quality and flow direction. There is no indication from the e-RAR that these wells were ever installed. The chemical data report only shows test pit and soil data. No ground water data is listed. NJ Transit must clarify the status of any ground water investigations conducted at the property.

In June 1998 the Department recommended a ground water investigation at the Y & T property because sheen was observed on the water table during UST excavations, and 3 post-excavation samples exceeded the IGWSCC for TPHC and PCE. There is no indication from the e-RAR that a ground water investigation was conducted. NJ Transit must indicate whether or not a ground water investigation was conducted.

For all other properties, CEAs with NFAs are conditionally approvable provided that CEA proposals are submitted in accordance with N.J.A.C. 7:26E-8.3 of the Technical Requirements for Site Remediation.

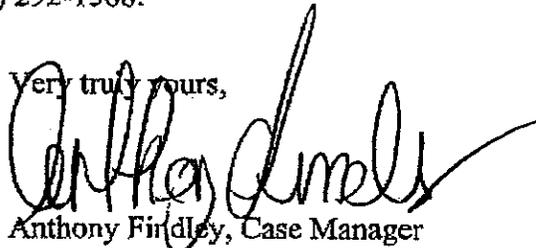
3. Appendix D of the e-RAR is supposed to show the extent of the proposed CEA for the MOS-1 section. However, the appendix is blank. NJ Transit shall provide an e-version of the appendix that shows the proposed CEA extent.

In addition to the above, please provide within 45 days of this letter a paper copy of the recorded deed notices and an electronic copy in read only format, including all exhibits, to the following:

1. The Department;
2. The municipal clerk, mayor and town council of the municipality in which the sites are located;
3. The local, county and regional health department in which the sites are located;
4. Each gas, electric, water, sewer, cable company and all other utilities that service the sites or have a license or easement to cross the sites;
5. The New Jersey Realtors Association; and
6. Any other person who requests a copy.

The Department will issue A No Further Action Letter and Covenant Not to Sue for the above two projects Area of Concerns as soon as a copy of the recorded deed notices has been received. Should you have any questions regarding the above please do not hesitate to contact me at the above or at (609) 292-1388.

Very truly yours,



Anthony Firdley, Case Manager  
Bureau of Case Management

Cc: Daryl Clark, BGWPA  
Steve Byrnes, BEERA  
NJTRANSIT project files