

**Response to NJDEP Comments Dated June 4, 2012
March 2012 Remedial Investigation Report
Site 16; Jersey City, New Jersey**

Tetra Tech, on behalf of PPG Industries, Inc. (PPG) and Shaw have prepared the following responses to the NJDEP comments for the Site 16 Remedial Investigation Report. A response to each of the comments has been provided below each comment in bold text.

The RI report did not include any discussion of the presence of CCPW (including chromate ore processing residue [COPR]) other than identification of COPR in the boring logs provided in Appendix B. This issue of not identifying CCPW/COPR within the body of RI reports has been brought to the attention of PPG in the past on other sites (e.g., Site 114 off-site borings, Site 63/65 RIR). The presence and/or absence of CCPW (including COPR) needs to be identified, pursuant to Judicial Consent Order (JCO), in the text, tables, and figures in this, and subsequent reports, for all sites.

Response: The presence of CCPW/COPR has been added to the text, figures, and appendix of this report.

GENERAL COMMENTS

1. Comments to the RIR, dated May 11, 2012 provided by Environmental Remediation and Financial Services, LLC (ERFS, consultant to Jersey City), were considered during development of these comments. Administrative/Editorial comments included in ERFS' email, forwarded by the Site Administrator's project manager on May 11, 2012 to PPG should be incorporated into the revised RIR.

Response: The comments from ERFS will be incorporated into the revised RIR.

2. Delineation has not been completed for CCPW-related contamination in soil present at Site 16. There were no clean hexavalent chromium samples (less than 20 milligrams per kilogram) between specific samples and property boundaries, there were multiple borings containing COPR (as noted in the boring logs) along the property boundaries, and there were multiple samples which contained vanadium and thallium at concentrations greater than the residential direct contact soil remediation standards (RDCSRS) along the property boundaries. Full delineation to the RDCSRS is required.

Response: Based on the technical memorandum, conference calls, and discussions with NJDEP further delineation was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2012 with minor revisions as discussed with NJDEP. The delineation included the collection of soil samples from additional soil borings, installation and sampling of monitoring wells (deep and shallow), and the collection of soil samples for SPLP analysis. The results of the delineation are incorporated into the revised RIR in a separate section. In addition, historical samples and lines of remediation have been added to the figures to assist in the delineation.

3. A significant number of samples exceeded the Department's default impact to groundwater soil remediation standards (IGWSRS). PPG may wish to develop site-specific IGWSRS,

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consistent with one of the Department-approved methods identified at <http://www.nj.gov/dep/srp/guidance/rs/> rather than rely on the default values. In addition, the discussions of IGWSRS exceedances should include evaluation of the groundwater elevation, as IGWSRS only apply to soils in the vadose zone. As per New Jersey Administrative Code (N.J.A.C.) 7:26E-4.2(a)3, contamination at the site must be delineated to whichever IGWSRS is established for the site.

Response: Site Specific IGWs were calculated with data obtained from the delineation sampling in December 2012. Text regarding this site specific IGW will be found in Section 4 as well in the calculations in an appendix.

4. Exceedances (at a minimum) of current remedial standards in historic soil samples (e.g., information referenced in the Remedial Investigation Work Plan) which have not previously been remediated by excavation (e.g., PE11-001), should be included in the text, tables, and figures of the RIR to ensure that a complete picture of the site-related contamination is presented.

Response: Historical data has been incorporated in Figures 6, 7a, and 7b of the RIR. Text has been updated to incorporate historical data. An Appendix will present the historical figures.

5. The presence, location, and volume of waste material (COPR), identified in the boring logs, should have been presented within the body of the RIR document. Identification of this information is critical to understanding the scope of contamination present at the site.

Response: References to locations where COPR/CCPW was located will be incorporated throughout the document (mainly in Section 4.0) and figures.

6. CCPW (e.g., COPR) was identified in several borings without there being “clean” (non-CCPW-containing) borings between the boring location and the site perimeter. The extent of all CCPW must be fully identified, and be addressed in the Remedial Action Work Plan.

Response: Further delineation was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2013 with minor revisions as discussed with NJDEP. Figures have been revised to present the information of possible clean borings with COPR along with and lines of remediation.

7. The RIR must discuss data quality issues, including how those issues impact the findings of the Remedial Investigation. The RIR should discuss the impact of quantitation levels exceeding remedial standards (e.g., thallium) on the remedial investigation findings. The RIR should also discuss how the outcome of the validation reports presented in Appendix E impact the findings, and what impact samples having detection limits that were greater than remedial standards have on the conclusions presented in the RIR.

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Response: The investigation was conducted in accordance with the approved RIWP and uses USEPA SW-846 Method 6010C. The laboratory reported the results to the Reporting Limit initially and after discussions with NJDEP and the laboratory the results of the laboratory analysis were reported to the Method Detection Limit and there are few concerns related to the impact of quantitation levels for thallium. Additional text has been added to Section 2. The delineation sampling conducted in December 2012 and January 2013 used USEPA SW-846 Method 6020A that has a lower quantitation level for the metals of concern.

8. Pursuant to N.J.A.C. 7:26E-1.12(e)2, an updated receptor evaluation is required to accompany any submitted RIR. Please ensure all receptor evaluation updates are submitted in accordance with the timeframes and at the milestones established under the applicable regulations. Based on the information presented within the RIR, further evaluation, specifically, surface water and sediment sampling within Claremont Creek/Ditch would be required to eliminate the potential contaminant exposure pathway and support the conclusion that an ecological risk assessment is not required.

Response: An updated receptor evaluation has been added to the RIR based on the NJDEP Receptor Evaluation Forms submitted by AECOM. An evaluation of the groundwater data was added to Section 5.3 of the RIR. Based on the results of that evaluation, it does not appear likely that contaminants from the groundwater would impact the surface water or sediment in Claremont Creek/Ditch. Therefore, this evaluation supports the conclusion that an ecological risk assessment is not required.

9. Delineation has not been completed for CCPW-related contamination in groundwater at Site 16. Total chromium in groundwater has not been delineated horizontally to the east of 016_MW08 and no vertical delineation sampling has been conducted at the site to date. Please complete delineation and submit the findings of the groundwater investigation within the revised RIR.

Response: Further delineation was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2013 with minor revisions as discussed with NJDEP. Figures have been revised to present the groundwater data from the January 2013 sampling event.

10. Since groundwater contamination has been detected at Site 16, PPG must determine the locations and invert depths of all utilities at the site and compare those data to the horizontal and vertical limits of the groundwater plume to determine if there is a potential for contaminant migration along utility bedding and/or infiltration into utilities. This assessment should be done concurrently with delineation (horizontal and vertical) for chromium exceedances in groundwater detected at Site 16.

Response: The location of the utilities at the site and the surrounding streets will be provided in an appendix. Text will be added to the RIR that will indicate if there is a

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potential of contaminant migration along the utilities. Appendix K has information regarding utilities.

11. As per N.J.A.C. 7:26E-1.6(a)3, a completed case inventory document is required.

Response: A case inventory document will be submitted with the RIR.

SECTION-SPECIFIC COMMENTS

1. Remedial Investigation Report Form Several issues were noted on the Remedial Investigation Report Form, as presented below:

a. Section E, items 1 through 3: Since this RIR is for CCPW-related contamination only, item 1 should have the “Area(s) of Concern (AOCs) Only” box checked rather than the “Entire Site (based on a completed and submitted Preliminary Assessment/Site Investigation)” box. Also please fill in items 2 and 3.

Response: Comment noted

b. Section E, item 4: Please change “Yes” to “No” for the question “Is the Remedial Investigation Complete.” See General Comment 2.

Response: Comment noted, however the results of the delineation investigation will determine the box that will be checked.

c. Section F, item 4: Please also check the “contaminated soil in the saturated zone” box, as this reflects conditions described in the RIR.

Response: Comment noted

d. Section G, item 1: Item 1 specifies that default remediation standards were used for direct contact soil standards, impact to groundwater soil screening levels, and ecological screening levels. The ecological screening levels were discussed in Section 5 of the RIR.

Response: Comment noted. Item 6 was checked since Site-specific IGW SSL for nickel was calculated during the delineation investigation.

e. Section J, Item 3: Based on the information presented in the RIR, the CCPW-related contaminants (including COPR identified in boring logs) is “located within the defined boundaries of the historic fill.” Please change response for this item from “No” to “Yes.”

Response: Comment noted

f. Section L, item 3: Since bedrock groundwater samples have not been collected, the answer of “No” to the question “Is ground water in the bedrock aquifer contaminated?” should be deleted/question left unanswered.

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Response: Comment noted

- g. Section L, item 4: It appears that vertical delineation has not been accomplished for the groundwater contamination identified in the RIR. Please revise this answer from “Yes” to “No.”

Response: Comment noted.

2. Executive Summary, page ES-1, third paragraph, third sentence: The sentence should be revised to clarify that it was the trivalent chromium soil cleanup criteria which was not exceeded at the site, as the next sentence indicates that the hexavalent chromium soil cleanup criteria (not screening criteria, as stated) was exceeded in 15 soil samples.

Response: The two sentences have been modified so that they state the following: “None of the samples containing chromium exceeded the New Jersey Department of Environmental Protection (NJDEP) Chromium Soil Cleanup Criteria for trivalent chromium. Hexavalent chromium was detected in 126 soil samples, where 15 samples had a concentration higher than the hexavalent chromium soil cleanup criteria.”

3. Executive Summary, page ES-1, fifth paragraph, last sentence: The text should be revised to clarify that, while antimony and thallium were not detected in the groundwater samples collected from the site, in every sample the detection limit exceeded its respective groundwater quality standard for these two contaminants of concern. See General Comment 7.

Response: See the response to General Comment 7.

4. Executive Summary, page ES-1, seventh paragraph: See General Comment 8.

Response: See the response to General Comment 8.

5. Section 1.2, page 2, second and third paragraph: The RIR should present on figures the locations of all Interim Remedial Measures (IRMs) still present, the locations and depths of all areas where remediation has taken place, and the locations of all samples collected historically with contaminant concentrations in excess of current remedial standards which were not previously remediated. The RIR should also provide a figure with the locations/extent of previously-conducted remedial actions for which No Further Action (NFA) determinations have been provided by the Department (and provide a copy of the NFA determinations as an appendix to the RIR).

Response: The Interim Remedial Measures and available historical data have also been incorporated in Figure 6, 7a, and 7b of the RIR. Text has been updated to incorporate available historical data. An Appendix will present the historical data as well as historical figures and will include copies of the NFA determinations.

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6. Section 2.1, page 4: Per the sixth bullet, the locations of foundation wall samples 016_I010FW, 016_I010aFW, 016_I011FW, and 016_I012FW have been adjusted from what was proposed through the approved field change request (dated 8/31/2011) from the work plan. These locations should be graphically depicted in the RIR. Additionally, deviations from the work plan (e.g., planned samples not collected, such as the 20-20.5 feet below ground surface [ft bgs] sample from boring 016-C009) should also be captured in Section 2.1 of the RIR.

Response: Foundation wall samples location will be added to Figure 2 and the deviation of planned samples not collected will be captured in Section 2.1.

7. Section 2.2.1, page 4: The text states that “geological cross sections using the new boring logs are shown in Figures 3 and 4.” The cross sections should be revised to incorporate presence of CCPW identified in the boring logs provided in Appendix B. See General Comment 5.

Response: The cross section figures will be updated showing COPR.

8. Section 2.2.3, page 6: Please provide, and reference, a figure which shows the location of the concrete foundation wall samples.

Response: Concrete foundation wall sample locations will be added to Figure 2.

9. Section 2.3.1, page 6, first paragraph, second sentence, and Appendix C: The monitoring well records provided in Appendix C do not meet the requirements of the Monitoring Well Certification Forms A and B, since they do not include the certification information by the licensed well driller and surveyor, respectively. Please include copies of the appropriately-certified forms. Also, please correct the discrepancy between the text (which states protective casings and protective covers were used for each well) and the Monitoring Well Records in Appendix C (which indicate that protective casings were not used on any well).

Response: Text will be added to correct the discrepancy with the casing protective covers. Appendix D (previously C) will be updated with the Monitoring Well Certification Forms provided by the driller and surveyor.

10. Section 2.6.4, page 9: See General Comment 7.

Response: See the response to General Comment 7.

11. Section 3.4.1, page 12, second paragraph: Please change the two references to “Sites 63 and 65” to “Site 16.” Also please update the industrial well information to refer to wells identified in the Receptor Evaluation for Site 16.

Response: The text has been changed according to the comment.

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12. Section 3.4.1, page 11, second to last sentence: Please provide additional information as to the location and status of the industrial groundwater well in relation to the site. In addition, the February 2011 draft Remedial Investigation Work Plan indicated “[a]n updated well search will be performed during the Site 016 RI and presented in the RI Report.” The updated well search is not included with the RIR.

Response: The RIR text was updated with a new well search. The well search from the Receptor Evaluation Form is presented in the RIR as Appendix G.

13. Section 3.4.2, page 12: The statement in the text that “groundwater flow is towards the east to the Upper New York Bay” is not supported by the groundwater contour map presented as Figure 5, which shows the groundwater flow direction to the north-northeast. Please revise.

Response: The text will be revised based on the comment.

14. Section 4.0 and subsequent subsections: The RIR should present information on the limits and extent of CCPW observed during installation of the Remedial Investigation sampling program. See General Comment 5. Additionally, a subsection specific to thallium should be added; see General Comments 3 and 7. Further, per the requirements of N.J.A.C. 7:26E-4.2(a), the limits of soils containing exceedances of the residential direct contact and impact to groundwater soil remediation standards must be fully delineated.

Response: See the responses to General Comments 3, 5, and 7. Further delineation was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2013 with minor revisions as discussed with NJDEP. The text of this section has been revised with the information obtained during the delineation sampling.

15. Section 4.1.1, page 13: It is noted that antimony contamination has not been fully delineated either vertically or horizontally. While antimony was undetected in samples along the perimeter boundary (e.g., 016_D005, 016_J005, 016_L005), the detection limits for these samples were an order or magnitude above the applicable remedial standard. Further, as indicated on Tables 6 through 8, forty-seven soil samples had non-detectable concentrations of antimony with detection limits greater than the default impact to groundwater soil remediation standard, and four soil samples had non-detectable concentrations of antimony with detection limits greater than the residential direct contact soil remediation standard. See General Comments 3 and 7.

Response: See the response to General Comments 3 and 7. The investigation was conducted in accordance with the approved RIWP that used of USEPA SW-846 Method 6010C. The laboratory reported the results to the Reporting Limit initially and after discussions with NJDEP and the laboratory the results of the laboratory analysis were reported to the Method Detection Limit and there are few concerns related to the impact of quantitation levels for antimony. Additional text has been added to Section 2. The delineation sampling conducted in December 2012 and January 2013 used USEPA

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SW-846 Method 6020A that has a lower quantitation level for the metals of concern. The text in Section 2 and 4 has been revised based on the change to how the laboratory reported the data.

16. Section 4.1.3, page 14: Hexavalent chromium contamination at Site 16 has not been fully delineated horizontally to the north, east, or south. Also, as indicated on Tables 6 and 8, sample 016_I012_2.5 had a non-detectable concentration of hexavalent chromium with a detection limit of 69.3 milligrams per kilogram (mg/kg), greater than its remedial criterion of 20 mg/kg. See General Comment 2 and General Comment 7.

Response: See the responses to General Comments 2 and 7. The figures have been revised to include the IRMs that provide the horizontal delineation to the north and east of the site. Further delineation to the south and southeast was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2013 with minor revisions as discussed with NJDEP.

17. Section 4.1.4, page 14: Nickel contamination has not been fully delineated at Site 16; however, with the exception of one sample, all exceedances of nickel were exceedances of the default IGWSRS. See General Comment 3.

Response: See the response to General Comment 3. The results of the Site-Specific IGW eliminated most of the exceedances of nickel.

18. Section 4.1.5, page 14: Vanadium contamination has not been fully delineated horizontally to the north, east, or south. See General Comment 2.

Response: See the response to General Comment 2 and Specific Comment 16.

19. Section 4.2, page 15: Groundwater contamination at the site (chromium and possibly antimony and thallium) has not been delineated vertically and horizontally as required per N.J.A.C. 7:26E-4.3(a)4.

Response: Further delineation for chromium was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2013 with minor revisions as discussed with NJDEP. See the response to General Comment 7 related to antimony and thallium.

20. Section 4.2.1, page 15: While it is agreed that antimony and thallium were not detected in any of the groundwater samples collected at Site 16, the detection limit for all samples exceeded the groundwater quality standard for both analytes. Per N.J.A.C. 7:26E-2.1(a)4, the detection limit must be sufficiently sensitive to accurately measure concentrations to meet the remedial standards. See General Comment 7.

Response: See the response to General Comment 7.

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21. Section 4.2.3, page 15: Please remove the sentence “None of the groundwater samples exceeded Groundwater Quality Standard” as the Department has not established a groundwater quality standard for hexavalent chromium.

Response: The sentence has been removed from text according to the comment.

22. Section 5.2, page 18, last paragraph: The text refers to the receptor evaluation report “found in Appendix H-2.” The receptor evaluation report was not included in the RIR. See Section-Specific Comment 42.

Response: The final Receptor Evaluation Forms will be included in the RIR. See the response to General Comment 8.

23. Section 5.3, page 18: A determination of whether thallium may be a contaminant of potential environmental concern (COPEC) should be evaluated against the detection limit achieved for thallium in the surface soil samples. See General Comment 7.

Response: See the response to General Comment 7.

24. Section 5.4, page 18: See General Comment 8.

Response: See the response to General Comment 8.

25. Section 6.0, pages 19-20: The “Conclusions” section of the RIR should describe the completeness of the delineation of all contaminants detected in each media at the Sites in concentrations in excess of remedial criteria, the limits of CCPW identified in the investigatory borings, and a summary of concerns arising from the data quality assessment. See General Comments 2, 6, and 7. The RIR must also include a recommendations section, per N.J.A.C. 7:26E-4.9(a)6, which determines whether remedial action is required for each area of concern. See General Comments 5 and 6.

Response: Section 6.0 has been revised based on the comment.

26. Section 6.0, page 19, Soil: As per N.J.A.C. 7:26E-4.2(b)1, the Remedial Investigation must include a sufficient number of soil samples to delineate the horizontal and vertical extent of soil contamination, yet delineation has not been completed at Site 16. See General Comments 2, 3, and 7. Additionally, the conclusions section should take into account all historic data for which remedial action(s) were not conducted to date. See General Comment 4.

Response: See the responses to the General Comments. Section 6.0 has been revised based on the comment and will take into account historic data.

27. Section 6.0, page 19-20, Groundwater: As per N.J.A.C. 7:26E-4.3(a)4, the Remedial Investigation for groundwater must include vertical as well as horizontal delineation of groundwater contamination.

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Response: Based on the technical memorandum, conference calls, and discussions with NJDEP further delineation was conducted in December 2012 and January 2013. Delineation was performed according to the Technical Memorandum sent to NJDEP on July 16, 2012 with minor revisions as discussed with NJDEP.

28. Section 6.0, page 19-20, Groundwater: As per N.J.A.C. 7:26E-4.3(a)7 and N.J.A.C. 7:26E-4.9(a)7, a proposed groundwater classification exception area is required.

Response: Comment noted.

29. Section 6.0, page 20, Groundwater, second bullet: See General Comment 7.

Response: See the response to General Comment 7.

30. Section 6.0, page 20, Groundwater, last bullet: Please delete the last sentence in this bullet.

Response: The sentence has been removed from the text based on the comment.

31. Section 6.0, page 20, last paragraph: See General Comment 8.

Response: See the response to General Comment 8.

32. Table 4 and Appendix C: The contour reporting form indicates “No” to the question “Are there any monitor wells in unconfined aquifers in which the water table elevation is higher than the top of the well screen?” However, the data presented in Table 4 (Monitoring Well Characteristics) show that the water elevation in every well was higher than the well screen for that respective well. Please address.

Response: Table 3 and Appendix D (previously C) will be reviewed and revised accordingly.

33. Tables 5A, 5B, 5C, , 9, 11, and 12: Tables 5, 9, 11, and 12 were provided as “positive hit/hits tables” for soil, groundwater core, and foundation samples, respectively (Table 5 was divided into three sub-tables, 5A, 5B, and 5C to compare results to residential, non-residential, and impact to groundwater soil standards, respectively). Please clarify that all data used to make remedial decisions have been validated.

Response: The data collected according to the approved RIWP for this RIR and used to make remedial decisions was validated. Text has been added to Section 2.6.4 discussing the data validation process. The samples collected during this investigation were validated.

34. Tables 5A and 5B: Note that the remedial criterion identified for “chromium” in Table 5A is for trivalent chromium only. The remedial criterion for “chromium” should be removed from Table 5B, as a non-residential criterion has not been developed for trivalent or total chromium.

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Response: Comment noted. Tables 5A and 5B will be revised as well as Figures 7A and 7B based on the comment.

35. Table 12: Table 12, identified as the “Positive Hits Table for Foundation Samples” identified as the second Table 11 should be renumbered as Table 12.

Response: Comment noted. The table will be revised based on the comment.

36. Table 13: Please provide a source for the “New Jersey Ecological Screening Criteria table” and include the source in the references section of the RIR.

Response: References and sources have been added to Table 13.

37. Figures 3 and 4: See General Comment 5 and Section-Specific Comment 7.

Response: See the response to General Comment 5 and Section Specific Comment 7.

38. Figures 7, 7A, 7B, and 7C: Figure 7, identified as Soil Sampling Exceedances, must be revised to include all exceedances, including historic exceedances (e.g., post-excavation sample PE011-001) which were not removed/remediated following sample collection. It appears as if the data presented on Figure 7 is limited to that data set collected during the 2011-2012 field mobilizations. This applies also to the information presented on Figures 7A, 7B, and 7C. See Section-Specific Comment 5.

Response: The figures have been revised to incorporate available historical data.

39. Figure 7C: As per current Department guidance, “the impact to groundwater pathway only pertains to the unsaturated zone” (*Frequently Asked Questions for the Impact to Ground Water Pathway in Soil Remediation Standards*, Ver 1.0, 1/27/2011). Therefore, it is not possible to exceed the impact to groundwater soil remediation standards at depths below the water table. Figure 7C should be revised to remove all references to impact to groundwater “exceedances” in soil samples below the water table, as established by the groundwater contour map provided as Figure 5. See General Comment 3. Also, Figure 7C should be revised to remove references to hexavalent chromium “exceedances” of the impact to groundwater soil remediation standards, as a default IGWSRS has not been developed for this substance.

Response: The figure will be revised based on the comment.

40. Appendix B: The boring logs appear internally inconsistent in some instances. One example: in boring 016-F005, the description of soil recovered from the 2.3-4.4 ft interval is described as “Very Dark Grayish Brown (10YR 3/2) medium SAND, little fine sand, trace coarse sand & silt, 80% COPR from 1.6’ – 2.1 ft, loose to medium dense, moist-wet, no odor (SP)” while the field notes section reports “80% COPR noted 1.5’ – 2.1’.” In addition to the depth intervals of reported COPR not being consistent between the Burmister System Soil

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Description column and the notes column, it is not understood why information on the presence of COPR in the 1.6' (or 1.5') -2.1 ft interval would be reported in a description for soil types reported in the 2.3-4.4 ft interval. Please review the boring logs as presented against the raw field notes to ensure accuracy and consistency of information presented, and revise the RIR, as needed, based on the findings of the review. See General Comment 5.

Response: Boring logs will be reviewed.

41. Appendix E: Analytical data packages, including full data deliverables for hexavalent chromium soil sample results, must be provided as per N.J.A.C. 7:26E-2.1(a)15. Electronic data deliverables (HazSite Data Deliverables format) must be provided as per N.J.A.C. 7:26E-1.6(a)5.

Response: Comment noted.

42. Appendix H: As per N.J.A.C. 7:26E-1.12(e)2 and N.J.A.C. 7:26E-4.9(a)2, an updated Receptor Evaluation form must be submitted with the Remedial Investigation Report. As was noted in an email from AECOM (A. LoPilato) to Weston (P. Amin) and Planning Progress (B. McPeak) dated January 20, 2012, the Receptor Evaluation was to be “updated based on the BEE [Baseline Ecological Evaluation] findings, and resubmitted with the Tetra Tech RI.” See General Comment 8.

Response: See response to General Comment 8.