



## State of New Jersey

**PHILIP D. MURPHY**  
Governor

**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
Division of Waste & UST Compliance & Enforcement  
Bureau of Solid Waste Compliance & Enforcement  
9 Ewing Street  
P.O. Box 420, Mail-Code 09-01  
Trenton, NJ 08625-0420  
Tel.: (609) 292-6305 Fax: (609) 292-4539

**SHAWN M. LATOURETTE**  
Commissioner

**TAHESHA L. WAY**  
Lt. Governor

Sent via email to:

[Keith Kazmark: kkazmark@ridgewoodnj.net](mailto:kkazmark@ridgewoodnj.net)

[Christopher Rutishauser: crutishauser@ridgewoodnj.net](mailto:crutishauser@ridgewoodnj.net)

December 11, 2023

**CERTIFIED MAIL – RRR**  
7022 3330 0001 3350 2709

**RE: Ridgewood Village Historic Site at 460 West Saddle River Road**  
**Issues with reported data associated with imported fill**  
**EA ID#: U4347**

Gentlemen:

The following evaluation of the analytical data reportedly associated with the soils imported to the referenced site reiterates information from Mr. Chris Rutishauser, Ridgewood Village's Director of Public Works/Village Engineer, followed by a response from NJDEP's Bureau of Solid Waste Compliance & Enforcement (BSWC&E). Further appropriate actions necessary to pursue closure of this solid waste case are also presented.

**Ridgewood Explanation for South Broad Street Fill Source:**

*"I visited this site when the offer of the soil became available. I did not observe an[y] indications of contamination in the soils. The development that generated the material was reviewed by the Village's planning board, for which I am the licensed review engineer. The material required and received a Village of Ridgewood major soil moving permit (planning board approves the permit followed by Village Council approval of the permit). Testing was done on the material in 2018 by Peak Environmental. Peak estimated the quantity of soil at 8,000 cubic yards. Peak collected 14 samples for testing under a reduce[d] sample quantity due to justification. Peak did not note any impacts to the soils sampled. The first three pages of their report submitted explains their protocol and observations. We used this soil as the bulk of the material for the berm construction. The berm was constructed by the Village's Streets Division using several of the Village's rubber tire front end loaders."*

**BSWC&E Response for Ridgewood Dayton, LLC – 152 South Broad Street fill source:**

The estimated 8,000 cubic yard soil source was indicated to be from excavations associated with the demolition of a building at a site that underwent remediation. No description of the remediation nor the potential of environmental impacts from the remediated discharge(s) to have impacted the soils taken to 460 Saddle River Road were discussed, yet the sampling and analyses protocol was reduced by relying on such data to reduce the analytical frequencies per cubic yard as compared to the NJDEP Guidance Document: "Fill Material Guidance for SRP Sites". Based on yet to be explained judgements, the analytical parameters were also further reduced. For example, for a volume of 8,000 cubic yards the aforementioned guidance document suggests that 21 samples be collected and analyzed unless information can be used to reduce such frequency to 14 samples to be analyzed. Yet, the consultant secured analyses from only 4 samples for polychlorinated biphenyls (PCBs, a.k.a. "Aroclors") and only 4 samples for pesticides while providing 14 samples for analyses for EPH, PAHs and Metals. While only 5 samples were analyzed for volatile organic compounds (VOC), field screening using a photoionization detector (PID) revealed no responses and therefore the BSWC&E does not disagree with the limitation of the VOC analyses. However, an explanation regarding the use of the reduced sampling frequencies and further reduction of analytes below those noted in NJDEP guidance has not been provided.

The Conformance/Non-Conformance Summary within the laboratory report submitted to the BSWC&E revealed that, while the instrumentation was operating correctly, sample matrix interference was observed which caused the surrogate recoveries of several of the metals analyzed via method 6010D and several of the semi-volatile organic compounds to produce analytical data which may be biased low.

**Ridgewood Explanation for Bergen Community College Site fill source:**

*“Through a contact, Bergen Community reached out to the Village and inquired if we would like some fill soil. I examined the soils at the college. I did not observe any indication of contamination. On September 27, 2019 ANS Consultants collected 5-point grab samples and subjected them to laboratory analysis. Laboratory results indicated the soils were suitable for the intended use at the Schedler site. The Village received approximately 500 cubic yards of material from the college.”*

**BSWC&E Response for Bergen County Community College fill source:**

No discussion on the reason for the excavation at this site was provided. The volume of soil represented by the 5-point composite to one sample is reported at 500 cubic yards. Compositing of such sample, although not preferred, may be acceptable, depending upon the reason for the excavation. The cover letter to the tabulated data indicates that the Department (NJDEP) does not require the Mercury found at 0.615 ppm, which is over the Migration to Ground Water Standard of 0.1 ppm as noted in N.J.A.C. 7:26D, to be addressed unless there is cause to believe that its presence is due to a discharge. However, such policy is applicable only for background conditions or historical fill scenarios where the subject fill is proposed to remain in place and does not address the movement of such fill to another site without a requisite evaluation of the potential impacts of such fill material. That is, the property at 460 Saddle River Road was not undergoing a remediation approved by a Licensed Site Remediation Professional (LSRP) retained pursuant to N.J.A.C. 7:26C at the time the fill was imported. As such, fill was not integrated into a remedial process pursuant to the “Like on Like” – 75 percentile assessment as noted in N.J.A.C. 7:26E-5.2 nor was a site-specific Migration to Ground Water pathway soil remediation standard established pursuant to N.J.A.C. 7:26D. Accordingly, no information has been presented to justify bringing in contaminated fill to a site that may have been uncontaminated prior to the importation of the subject fill materials.

The area(s) at the 460 Saddle River Road site where these soils were distributed are currently unknown to the BSWC&E. Further, there was no laboratory report or Non-Conformance Summary submitted with this data, therefore the integrity of the analytical results cannot be evaluated if limited to the information provided.

**Ridgewood Explanation for 533 Wyndmere fill source:**

*“This location was a residential house that was constructing a large addition and reached out to us to see if we were interested in their surplus material. I examined the soil in the field. It was a fine to medium sand, trace silt and would be excellent grading fill for the Schedler project. The site’s soil moving permit indicated approximately 280 cubic yards of cut and 40 cubic yards of fill. ANS Consultants collected one sample and subjected it to laboratory analysis on or about May 19, 2021. The results were acceptable for the intended use of the material.”*

**BSWC&E Response for 533 Wyndmere fill source:**

One sample from 320 cubic yards of soil and fill excavated from a residential home was analyzed for Target Analyte List and Target Compound List compounds for which the results did not indicate a concern.

The area(s) at the 460 Saddle River Road site where these soils were distributed are currently unknown to the BSWC&E.

There was no laboratory report or Non-Conformance Summary submitted with this data, therefore the integrity of the analytical results cannot be evaluated if limited to the information provided.

**Ridgewood Water DeBoer Avenue and Route 208 Water Main Installation:**

*“Trench spoil from this project was made available. On August 9, 2021 Aqua Pro-Tech Laboratories tested one grab sample. The soil was found to be acceptable for its intended use. The site provided approximately 200 cubic yards of fill. This is the one location I did not personally observe the material at its generating source.”*

**BSWC&E Response for Ridgewood Water DeBoer Ave and Rt. 208 Water Main Installation:**

It appears that one sample from a reported 200 cubic yard source was analyzed for volatile organic compounds, metals, PCBs and pesticides. No Chain of Custody was submitted. It is not known when the date of analysis was. There was no Non-Conformance Summary submitted with this data, therefore the integrity of the analytical results cannot be completely evaluated if limited to the information provided.

However, a concern is noted for sample # 1080405-01 as it displayed a benzo[a]pyrene concentration of at least 0.48 parts per million (ppm) while the Residential Ingestion-Dermal pathway soil remediation standard for this compound is 0.51 ppm. Although the reported result is below the Residential Soil Remediation Standard that triggers the definition of solid waste, because this sample was diluted, presumably to rectify some matrix interference, the result is biased low.

This sample also displayed a mercury concentration of 0.105 ppm. N.J.A.C. 7:26D denotes a Migration to Ground Water pathway standard for Mercury of 0.1 ppm.

This sample also displayed a benzo[a]anthracene concentration of at least 2.60 ppm while N.J.A.C. 7:26D denotes a Migration to Ground Water pathway standard for this compound is 0.71 ppm.

Again, without LSRP interaction pursuant to N.J.A.C. 7:26 C, there was no evaluation of the appropriateness of bringing in contaminated fill to the 460 West Saddle River Road site.

The location(s) where this fill was distributed at 460 West Saddle River Road site has not been disclosed to the BSWC&E.

**Ridgewood Explanation for Water Main Replacement Jefferson, William and Salem Streets fill source:**

*"The source of this material was the spoil from a water main replacement project in the following Village streets: Jefferson Street, William Street, and Salem Street. Work was done by a contractor working for Ridgewood Water Company. I observed the trenching work on several occasions. I did not note any contamination concerns. Three samples were collected, one from each street, and tested by Aqua Pro-tech Laboratories on or about September 22, 2020. Trench was approximately 4,100 linear feet, 2.5-feet wide and 4.5-feet deep for a volume of approximately 1,700 cubic yards of soil."*

**BSWC&E Response for Jefferson, William and Salem Streets fill source:**

There was no Non-Conformance Summary submitted with this data, therefore the integrity of the analytical results cannot be completely evaluated if limited to the information provided.

**Ridgewood Explanation for the Ridgewood Water Company Spoil Pile:**

*"The Village's Water Company had excess soil from their water main break repairs. On January 12, 2021 SGS North America collected three grab soil samples for analysis. This testing was a follow up to testing Eurofins had done on December 22, 2016 of a single grab sample of soil. With the test results being acceptable for use, the Village trucked approximately 300 cubic yards of material from the spoil pile to Schedler. I observed this spoil pile before it was trucked and did not note any indications of contamination."*

**SWC&E Response for the Ridgewood Water Company Spoil Pile:**

The 2016 sample results revealed detection limits that were higher than the remediation standards. For example, the sample analyzed for benzo[a]pyrene was diluted ten-fold yielding a detection limit of 0.94 ppm while the Residential Ingestion-Dermal pathway remediation standard for this compound is 0.51 ppm. Further, the laboratory Case Narrative disclosed surrogate recovery issues with several organic compounds and metals. The follow-up analyses reported for the subject materials revealed that benzo[a]anthracene was detected in sample S-15R at 0.75 ppm which is above the Migration to Ground Water Pathway soil remediation standard for this compound which is 0.71 ppm. Further, benzo[a]pyrene in this sample was reported at a concentration of 0.744 ppm while the Residential Ingestion-Dermal Pathway remediation standard for this compound is 0.51 ppm, thus triggering the definition of solid waste. Sample S-18R revealed similar elevated concentrations of benzo[a]anthracene of 0.873 ppm and 0.852 ppm respectively. BSWC&E's interpretation of the Case Narrative/Conformance Summary did not raise concerns regarding the accuracy of the compounds found at concentrations over the noted remediation standards.

No locations where the subject materials were deposited have been provided. Further, given the exceedance of the remediation standards, no explanation regarding the suitability of the subject material for the 460 West Saddle River Road site was provided.

**REQUIRED FURTHER ACTIONS TO DOCUMENT FILL QUALITY:**

Berm Along Route 17:

With respect to the soils used to construct the berm, the following actions are necessary to further evaluate the suitability of such materials for the site at 460 Saddle River Road:

1. Provide a detailed explanation describing how the previous analytical data collected for the remediation case that was the source of the fill along with the physical distances or barriers between the contaminated materials and the materials brought to the 460 West Saddle River Road site to justify employing a reduction in the analytical frequencies published in NJDEP guidance.
2. Assuming that, in the opinion of the BSWC&E, such explanation is acceptable, provide a Sampling and Analysis Plan (SAP) that incorporates the following scope of work: collect ten discrete grab (non-composited) samples from the soil berm at equally distributed aerial and vertical locations representing a full cross section of the berm. Using an NJDEP certified laboratory who are also certified by the NJDEP for the test methods employed, analyze each of these samples for those Pesticides and PCBs from the Target Compound List and in accordance with the test methods noted therein as defined in N.J.A.C. 7:26E-1.8. Further, for the data already submitted to the BSWC&E, perform a comprehensive review of the Conformance/Non-Conformance Summary to determine which samples displayed biased low results for metals and semi-volatile organic compounds and add such analytes to similarly equally spaced samples such that there will be at least 14 samples representing Target Analyte List metals and Target Compound List semi-volatile organics, each as defined and in accordance with the analytical procedures noted in N.J.A.C. 7:26E-1.8, for which reliable data is generated. Provide a detailed explanation on this review and analyte selection process. For the purposes of compliance with the solid waste issue, it is not necessary to perform analyses for Tentatively Identified Compounds.

The SAP shall include a scaled site map noting the proposed sampling locations and analytical parameters. The plan should not be implemented until approved in writing by the BSWC&E.

Other Imported Fill Areas of Deposition:

With respect to the soils/fill deposited in other areas of the property at 460 West Saddle River Road, the BSWC&E has observed that such fill contains materials that, at least from a geotechnical consideration, may not be suitable base material for the artificial turf which the BSWC&E understands is being contemplated for this site. As such, should any of the fill deposited outside of the berm be removed from the property, appropriate characterization of same is needed to ensure that its use, or disposal is consistent with NJDEP regulations. If any of this fill is contemplated to remain in place, without knowing the locations of the deposition of the various sources of the fill material and because the data for at least some of the fill material is suspect, the aforementioned SAP should be expanded to incorporate sampling of the remaining areas of imported fill deposition. Such expanded plan should incorporate a scaled site map depicting a grid pattern denoting where discrete (non-composited) samples will be collected for analyses for Target Analyte List and Target Compound List analytes as defined and in accordance with the analytical methods noted in N.J.A.C. 7:26E -1.8 (minus volatile organic analyses if appropriate soil gas screening confirms such analyses is not necessary). The expanded SAP should not be implemented until approved in writing by the BSWC&E.

Case Management:

In order to close the solid waste issue associated with the imported fill materials, any such fill that exceeds the Residential Ingestion-Dermal/Inhalation soil remediation standards (without performing data averaging) must be removed. Accordingly, following review of the data to be generated from the SAP, the BSWC&E will advise Ridgewood Village of the scope of work needed to incorporate into a Corrective Action Plan (CAP) designed to address any residual solid waste as determined by both the physical and chemical triggers noted in N.J.A.C. 7:26 -1.6(a)6. The CAP should not be conducted until approved in writing by the SWC&E.

Once the BSWC&E is satisfied that appropriate removal of the fill materials that trigger the definition of solid waste at N.J.A.C. 7:26-1.6(a)6 has been achieved, a letter will be issued noting that the subject solid waste issue has been resolved.

Please note that the BSWC&E does not offer opinions on whether or not a site has been remediated or if a site is suitable to allow leaving fill materials in place that do not trigger the definition of solid waste, but have a contaminant within them at a concentration greater than the respective default Migration to Ground Water soil remediation standard at N.J.A.C. 7:26D. Accordingly, if it is desired to pursue further evaluation of the suitability to leave such soils in place, alternative, site specific Migration to Ground Water pathway standards can be generated as afforded by N.J.A.C. 7:26D if approved by a Licensed Site Remediation Professional (LSRP) retained pursuant to the Administrative Requirements for the Remediation of Contaminated Sites as noted in N.J.A.C. 7:26C. Accordingly, Ridgewood Village may want to consider performing additional testing approved by such LSRP to address such pathway during the mobilization addressing the requisite sampling to further evaluate the solid waste issues.

Enforcement:

Please be advised that Ridgewood Village's documented use of contaminated fill at this site is in violation of the Solid Waste Management Act, particularly N.J.A.C. 7:26-2.8(e). As such, the BSWC&E expects full cooperation from Ridgewood Village at this time to facilitate the BSWC&E's discretionary authority to minimize any enforcement actions/penalty assessments. **As such, please provide the requisite Sampling and Analysis Plan within sixty (60) days upon receipt of this correspondence.**

Attached to this letter please find generic guidance from the BSWC&E addressing our expectations associated with data collection. Should you have any questions, please promptly contact me.

Regards,



Tom Farrell, Chief  
Bureau of Solid Waste Compliance & Enforcement

- c: Dave Ongaro, BSWC&E  
Gina Lugo, BSWC&E  
Mike Hastry, DW&USTC&E  
Kate Marcopul, DEP – Historic Preservation Office  
Keona Miller, DEP – Local Government Affairs



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TRENTON NJ 08625-0420
Tel. (609) 292-6305
Fax. (609) 292-4539

DATA REVIEW DOCUMENTATION FORM

page 1 of 4 (last updated October 2023)

The following information should accompany analytical data submitted to the Bureau of Solid Waste Compliance and Enforcement (BSWC&E) for a determination that is limited to whether or not the materials represented by such data trigger the definition of solid waste pursuant to N.J.A.C. 7:26 - 1.6(a)6. BSWC&E's acknowledgement of such data shall not be construed to suggest that the New Jersey Department of Environmental Protection considers that the site represented by this data has been fully remediated in whole or in part. As this form is not designed for any one particular site, not all sections may be applicable.

[ ] Current Name and Address of site:

Two horizontal lines for text entry.

[ ] Specific Historical uses of property:

Two horizontal lines for text entry.

[ ] Mapped on NJ GeoWeb as located in an area of Historical Fill? \_\_\_\_\_

[ ] Have the subject materials been in contact with any construction and demolition debris or historical discharge of a hazardous substance or historical fill? \_\_\_\_\_

**SAMPLE COLLECTION INFORMATION:**

- Was the sampling conducted in conformance with the Technical Requirements for Site Remediation at N.J.A.C. 7:26E and the most recent version of the NJDEP Field Sampling Procedures Manual? \_\_\_\_\_. If no, please explain:
- 
- 

- Was the sampling conducted to address a known volume of materials? \_\_\_\_\_. If so, what is the total volume of materials addressed by this project? \_\_\_\_\_ cubic yards.

- If the sampling addressed an area wherein the volume of potentially contaminated materials was not known, how many square feet is such Area of Concern? \_\_\_\_\_ square feet.

- Only for sites where no VOCs are expected:** Were Target Compound List Volatile Organic Compounds (VOCs) eliminated from the analyses based on the response from a photoionization detector (PID)? \_\_\_\_\_

- If a PID was used, how, when and by whom was it calibrated (please include the type of calibration gas used)?
- 
- 

- What was the eV value of the bulb used in the PID? \_\_\_\_\_.

- At what units in parts per million (ppm) of response on the PID was the fill considered to not require analysis for VOCs? \_\_\_\_\_.

Describe the process used to screen the materials with the PID. If screening was conducted within in situ materials, please include areal frequency in square feet and depths (from surface grade). If screening was conducted within stockpiled materials, please include the distances within the stockpile and frequency of screening per cubic yards.

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- If other information was used to eliminate volatile organics from the testing methods of the subject fill besides PID screening, please note same here:

Please complete the following table:

Analytical Group	Analytical Frequency per cubic yard of stockpiled materials (if applicable)	Analytical Frequency per square foot of in situ materials in Area of Concern (if applicable)	Reason for Noted Analytical Frequency
Target Analyte Metals			
Target Compound List Volatile Organic Compounds			
Target Compound List Semi- Volatile Organic Compounds			
Target Compound List Pesticides			
Target Compound List PCBs			

- Has a Sample Location Map been provided noting the sample identification numbers in a manner that one who had not seen the site could readily understand where the samples were collected?

- If there was any deviation from the Department's most recent version of the Guidance Documents: *Fill Materials Guidance for SRP Sites, October 2021* or *Understanding DEP's Requirements for Soil and Fill Materials*, please provide your justification for same here:

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**SAMPLE ANALYSIS INFORMATION:**

List the name and the New Jersey Laboratory Certification number(s) for the laboratory(ies) used:

\_\_\_\_\_

Were there any analyses conducted for which the laboratory did not have a specific New Jersey certification to perform same (note: In addition to the NJ Laboratory Certification, laboratories are required to hold a certification from NJDEP for each analytical method)?

If yes, please specify which test method and affected analytes was/were not certified by NJDEP: \_\_\_\_\_

Has the analyses been performed in accordance with N.J.A.C. 7:26E-2 and accompanied by the applicable Reduced Regulatory Deliverables pursuant to Attachment A-II of N.J.A.C. 7:26E?

\_\_\_\_\_

Does each laboratory report contain a summary of the samples received noting any deficiencies with, at a minimum: temperature of the samples upon receipt, condition of the sample bottles, appropriate Chain of Custody documentation, compliance with sample holding times? If any such deficiencies were noted, please list them here:

\_\_\_\_\_

\_\_\_\_\_

Was a Conformance/Non-Conformance Summary included for each laboratory report? \_\_\_\_\_

Did the Conformance/Non-Conformance Summary suggest data that could not be relied upon? \_\_\_\_\_ . If yes, please specify which analytes for which samples were not usable:

\_\_\_\_\_

\_\_\_\_\_

Has any data averaging been employed in an Area of Concern to generate the conclusions drawn? \_\_\_\_\_ If so, specify which Area of Concern employed data averaging and include the computations for same in the report of findings.

Has the data been tabulated with comparison to NJDEP Remediation Standards at N.J.A.C. 7:26D? \_\_\_\_\_

Per my signature below, I certify that the information provided on this form is true and accurate to the best of my knowledge.

Print name of person completing this form: \_\_\_\_\_; sign: \_\_\_\_\_; date: \_\_\_\_\_



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9 Ewing Street, Mail Code 09-01  
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TRENTON NJ 08625-0420  
Tel. (609) 292-6305  
Fax. (609) 292-4539

### STANDARD SAMPLING and ANALYSES PLAN APPROVAL

(page 1 of 2)

**Project Name:**  
**NJEMS PI#:**  
**Date of S&AP:**

*The following document contains standard conditions and limitations that accompany any communication from the Bureau of Solid Waste Compliance and Enforcement (BSWC&E) which indicate approvals of Sampling and Analysis Plans. Unless otherwise appended to or altered by official written correspondence from the BSWC&E, these conditions and limitations shall apply.*

- 1.) This approval is limited to determine whether or not the soil/fill materials being sampled meet the portion of the definition of solid waste that addresses contaminant concentrations as referred to in N.J.A.C. 7:26-1.6(a)6. As such, analytical results from **any one** sample that indicate concentrations of contaminants that are above the Residential Ingestion-Dermal or Residential Inhalation soil remediation standards at N.J.A.C. 7:26 D are indicative of solid waste. While delineation of such contamination is acceptable with a plan approved by BSWC&E, **no compliance averaging** is accepted.
- 2.) The BSWC&E does not make determinations regarding whether or not soils or materials can be considered as Clean Fill pursuant to N.J.A.C. 7:26E -1.8. As such, upon receipt of acceptable data that indicates contaminant concentrations that are compliant with the definition of solid waste at N.J.A.C. 7:29-1.6(a)6, the BSWC&E will acknowledge same by noting compliance has been achieved with respect to the particular solid waste violation associated with the quality of the soil/fill materials. The BSWC&E does not make determinations regarding whether or not a site has been remediated.
- 3.) All sampling must be performed in accordance with the latest version of the NJDEP's Field Sampling Procedures Manual and N.J.A.C. 7:26 E – The Technical Requirements for Site Remediation.
- 4.) All analyses must be performed by a laboratory that has at least the following two certifications:
  - a.) Overall Laboratory Certification from the State of New Jersey; and, (b) Certification from the State of New Jersey for the particular test method being employed.

Project Name:

NJEMS PI#:

Date of S&amp;AP:

- 5.) Any proposed analytes shall incorporate the test methods associated with EPA's Contract Laboratory Program (CLP) and shall be those analytes included in the respective Target Analyte List (TAL) or Target Compound List (TCL) of the CLP. For example, any proposal to analyze for "Metals" shall be inclusive of all metals in the TAL. It is not necessary to include Tentatively Identified Compounds (TICs) when analyzing for TCL compounds. BSWC&E does not interpret Extractable Petroleum Hydrocarbon (EPH) data.
- 6.) The Quality Assurance Plans shall incorporate quality control provisions and report same that are at least as comprehensive as the Reduced Regulatory Deliverables pursuant to Attachment A-II of N.J.A.C. 7:26 E. The locations of the Laboratory Non-Conformance Summary, Sample Receipt Form and Chain of Custody shall be readily identified in the laboratory report.
- 7.) To expedite the BSWC&E's data review, in addition to the full scale laboratory report, a separate table shall be submitted which compares the data to the Residential Ingestion-Dermal and Residential Inhalation soil remediation standards at N.J.A.C. 7:26D. In order to facilitate the BSWC&E determination on whether or not the site needs to be referred to the Department's Site Remediation Program, the data should also be compared to the default Migration to Ground Water pathway soil remediation standards at N.J.A.C. 7:26D. Any comparison to a site specific Migration to Ground Water pathway soil remediation standard would not be performed by the BSWC&E. Further, if the site is located in a wetlands or other area of ecological significance, the analytical results should also be compared to the Ecological Screening Criteria.

*Place an "X" or appropriate number next to the applicable statement(s):*

- 8.) The proposed sampling frequency is: \_\_\_ acceptable as proposed; \_\_\_ needs to be increased to one sample per \_\_\_ cubic yards (for sampling the subject fill) or, one sample per \_\_\_ square feet (for post-excavation analyses).
- 9.) The proposed analytes are: \_\_\_ acceptable as proposed; \_\_\_ needs to include all of the TAL metals; \_\_\_ needs to include all of the TCL semi-volatile organics; \_\_\_ needs to include all of the TCL pesticides; \_\_\_ needs to include all of the TCL PCBs; \_\_\_ needs to include all of the TCL VOCs.
- 10.) The proposed field screening for volatile organic compounds (VOCs): \_\_\_ is acceptable as proposed; \_\_\_ must perform field screening with the stated instrument at intervals of \_\_\_ cubic yards or \_\_\_ square feet (if post excavation sampling); \_\_\_ must provide documentation of proper calibration; \_\_\_ if a photoionization detector is to be used, must specify the electron voltage of the bulb used.

Plan Approved By: \_\_\_\_\_  
on \_\_\_\_\_