



## State of New Jersey

Department of Environmental Protection  
SITE REMEDIATION AND WASTE MANAGEMENT PROGRAM  
Division of Remediation Management  
Remediation Oversight Element  
Mail Code 401-05A  
P.O. Box 420  
Trenton, NJ 08625  
609-984-1351  
Fax: 609-984-6514

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

CATHERINE R. MCCABE  
*Acting Commissioner*

Honeywell  
Ms. Maria Kaouris  
Remediation Manager  
115 Tabor Road, 4-D4  
Morris Plains, NJ 07950  
via email

September 18, 2018

### Approval

Re: Consent Judgment Compliance Letter

Remedial Action Type: Restricted Use

Scope of Remediation: Entire Site (Soil and Groundwater) - Chromate Chemical Processing Waste (CCPW) and CCPW-Related Metals

Hudson County Chromate (HCC) Study Area 6 North and Study Area 6 South Chromium Remedies – Allied

HCC Sites 073, 087, 088, 124, 125, 134, 140 and 163 (See Attachment 1 for details)

Program Interest Numbers: G000000927, G000008710, G000008711, G000008741, G000008742, 033312, 003846, and 010374

Blocks/Lots: 21901/4, 5, 9, and 10 and 24601/1 through 12  
Jersey City, Hudson County, NJ

Dear Ms. Kaouris:

The New Jersey Department of Environmental Protection (Department) has reviewed the site soil and groundwater remediation documents submitted by Honeywell pursuant to Paragraph 23.E of the 2011 Consent Judgment, and associated documents regarding remediation of chromate chemical production waste (CCPW) and CCPW-related metals (defined as hexavalent chromium, antimony, chromium, nickel, thallium, and vanadium) in soil at HCC Sites 073, 087, 088, 124, 125, 134, 140 and 163 (See Attachment 1 for details), information in the Department's case file, and the certified representations and information provided to the Department.

Based on the information provided, the Department concludes that the remediation of the CCPW and CCPW-related metals in soil and groundwater is protective of public health, safety, and the

environment. The Department further concludes that the remediation satisfies the requirements of the Consent Judgment in New Jersey Department of Environmental Protection, et al. v. Honeywell International Inc., et al., Docket No C-77-05, Superior Court of New Jersey, Chancery Division-Hudson County (filed September 7, 2011) ("Consent Judgment"), the Technical Requirements for Site Remediation at N.J.A.C. 7:26E, and the Administrative Requirements for Remediation of Contaminated Sites at N.J.A.C. 7:26C. As a result, the Department has determined that the remediation of the CCPW and CCPW-related metals in soil and groundwater are not subject to further review pursuant to N.J.S.A. 58:10C-21 and 58:10C-25.

By operation of law, a Covenant Not to Sue pursuant to N.J.S.A. 58:10B-13.2 applies to this remediation of CCPW and CCPW-related metals in soil and groundwater. The Covenant Not to Sue is subject to any conditions and limitations contained herein, and remains effective as long as the real property referenced above continues to meet those conditions. This includes the need to continue to comply with any permit Honeywell is required to obtain or has obtained (See Attachment 1 for details). Anticipated permits include those listed in Attachment 1, and monitoring well installation permits for any new monitoring wells and well decommissioning notice per N.J.A.C. 7:9D-3 for the eventual decommissioning of any site monitoring wells.

This letter serves as the functional equivalent to No Further Action ("NFA") letters issued pursuant to N.J.S.A. §58:10B-13.1 and N.J.A.C. 7:26C before those provisions were amended effective in 2012 to no longer authorize NFA letters. The Department recognizes this letter as serving the same function as previously served by NFA letters, and satisfies the same legal obligations formerly met by NFA letters, for sites regulated directly by NJDEP.

The Department requests Honeywell submit copies of this letter to the appropriate parties. If you have any questions regarding this matter, please contact me at (609) 984-1351.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne C. Howitz", with a long, sweeping horizontal line extending to the right.

Wayne C. Howitz, Assistant Director  
NJDEP

cc: John Morris, Honeywell  
William Hague, Honeywell  
Jersey City Department of Health & Human Services  
Municipal Clerk, City of Jersey City  
Hudson County Regional Health Commission  
David Doyle, NJDEP Case Manager  
Kirstin Pointin-Hahn, NJDEP BCAIN

**ATTACHMENT 1**





THE POWER OF CONNECTED

Health, Safety, Environmental, Product Stewardship and Sustainability  
115 Tabor Road, 4-D4  
Morris Plains, New Jersey 07950  
www.honeywell.com

September 14, 2018  
via electronic delivery

Mr. David Doyle, Case Manager  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
401 East State Street, Mail Code 401-06  
Trenton, NJ 08625-0420

**Re: Request for Letter of Compliance  
SA-6 North and SA-6 South Chromium Remedies  
Jersey City, New Jersey**

Dear Mr. Doyle:

As you requested during our telephone conversation on August 30, 2018, Honeywell is submitting this letter to request that NJDEP issue a Letter of Compliance for the SA-6 North and SA-6 South Chromium Remedies. The following are the Remedial Action Reports (RARs) submitted to NJDEP that document completion of the Chromium Remedies at SA-6 North and SA-6 South:

1. Remedial Action Report SA-6 South Chromium Remedy, February 8, 2017 (NJDEP approval letter dated March 30, 2017);
2. Remedial Action Report SA-6 North Chromium Remedy, March 16, 2017 (NJDEP approval letter dated June 1, 2017);
3. Shallow Groundwater RAR, SA-6 South Development AOC, July 20, 2018 (NJDEP approval letter dated September 13, 2018); and
4. Addendum to March 2017 Remedial Action Report, Focused Excavation Implementation at TA-10-1, SA-6 North, July 24, 2018 (NJDEP approval letter dated September 13, 2018).

As indicated on the attached tables, all Remedial Action Permits for soil and groundwater related to SA-6 North and SA-6 South have been issued by NJDEP. The Blocks/Lots and Program Interest Numbers related to each Remedial Action Permit are also listed on the tables. In addition, we have included a figure showing the ten chromium deed notice areas that correspond to the ten RA Permits for soil and figures showing the two shallow groundwater classification exception areas for chromium that correspond to the two RA Permits for groundwater.

We assume that for the Letter of Compliance, NJDEP will use the attached form "Form Closure Letter in Place of NJDEP No Further Action Letter for Remediated Chrome Sites Under Consent Decrees", agreed to by NJDEP and the Chrome Parties in 2013.

If you have any questions, please call me at (973) 455-3302.

Sincerely,

Maria Kaouris  
Remediation Manager

MK:dn/sgf

September 14, 2018  
Mr. David Doyle  
Request for Letter of Compliance  
SA-6 North and SA-6 South Chromium Remedies  
Page 2 of 2

Attached:       Summary of Remedial Action Permits-Soil and Groundwater  
                  Figure Showing Chromium Deed Notice Areas  
                  Figures Showing Shallow Groundwater Classification Exception Areas  
                  NJDEP Form Closure Letter for Chrome Sites

cc:           (electronic copy only)  
              Michael Daneker - Arnold & Porter Kaye Scholer, LLP  
              Jeremy Karpatkin - Arnold & Porter Kaye Scholer, LLP  
              Tom Byrne - Honeywell  
              Bill Hague - Honeywell  
              John Morris - Honeywell  
              Joe Clifford - Wood Environment and Infrastructure Solutions, Inc.

SUMMARY OF REMEDIAL ACTION PERMITS – SOIL AND GROUNDWATER

**SUMMARY OF REMEDIAL ACTION PERMITS - SOIL**

HONEYWELL INTERNATIONAL INC.  
JERSEY CITY, NEW JERSEY

DN No. (Soil Permits Only)	Permit Description	NJDEP Site Nos.	Contaminant(s)	Permit No.	PI No. Assigned to Permit	Block/Lot	NJDEP Approval (Received Date)	Effective Date	Biennial Certification Date
<b>CHROMIUM SOIL PERMITS</b>									
1**	SA-6 South Open Space Area (Includes Non-Cr COCs and HF)	073, 124, 125, 134, & 140	Cr, HF, & xylenes	RAP180002	033312	24601/1, 2, 3, 4, 5, 6, 7, 8 21901/8	7/6/2018	7/13/2018	7/13/2020
2	SA-6 South, Site 124 Route 440/lughandle - Deferred Area	124	Cr	RAP180001	G000008741	24601/8	6/12/2018	6/19/2018	6/19/2020
3	SA-6 South, Site 163 (Portion of Kellogg St/Riverside Dr)	163	Cr & HF	RAP180001	010374	24601/11	6/29/2018	7/6/2018	7/6/2020
4B	SA-6 South South, Site 073 - Deferred Area	073	Cr	RAP180001	G000000927	21901/8, 10	6/1/2018	6/8/2018	6/8/2020
5**	SA-6 North Open Space AOC (Includes Non-Cr COCs and HF)	087 & 088	Cr, HF, benzene & MTBE	RAP180004	G000008710	21901/5, 6, 7, 8, 9, 10	7/5/2018	7/12/2018*	7/12/2020
6	SA-6 North, Route 440 Deferred Area - Adjacent to EA2/3	088	Cr	RAP180001	G000008711	21901/5	6/18/2018	6/25/2018	6/25/2020
7	SA-6 North, TA-10 Area - South of Stegman Curb	087	Cr	RAP180003	G000008710	21901/9	6/13/2018	6/20/2018	6/20/2020
9	SA-6 North, Route 440 Deferred Area - Adjacent to EA1 & Adjacent to EA2/3	087	Cr	RAP180005	G000008710	21901/4	7/2/2018	7/9/2018	7/9/2020
10	SA-6 North, TA-7 / Block 6	087	Cr	RAP180001	G000008710	21901/10	6/13/2018	6/20/2018	6/20/2020

Note:

\*Effective Date on RA Permit says 07/12/2017 and first biennial certification date is listed as 07/12/2019.

\*\*Remedial Action Permits for DN #1 and DN #5 include portions of Block 21901/Lots 6, 7, & 8 (Study Area 7, Site 115); however, these Block/Lots are not included in the NJDEP Compliance Letter for Study Area 6.

SUMMARY OF REMEDIAL ACTION PERMITS - GROUNDWATER

HONEYWELL INTERNATIONAL INC.  
 JERSEY CITY, NEW JERSEY

CEA No. (GW Permits Only)	Permit Description	NIDEP Site Nos.	Contaminant(s)	Permit No.	PI No. Assigned to Permit	Block/Lot	NIDEP Approval (Received Date)	Effective Date	Biennial Certification Date
<b>CHROMIUM GROUNDWATER PERMITS</b>									
CEA100167476 [CEA A]	SA-6 North Open Space AOC Shallow Groundwater Zone	087 & 088	Cr	RAP180002	G000008710	21901/5, 9, & 10	8/1/2018	8/8/2018	8/20/2020
CEA100167476 [CEA B]	SA-6 South Open Space Area Shallow Groundwater Zone	073, 124, 125, 134, 140	Cr	RAP180001	033312	24601/1 through 8	7/30/2018	8/6/2018	8/6/2020

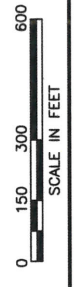
FIGURE SHOWING CHROMIUM DEED NOTICE AREAS



**LEGEND**

- 72-INCH FORCE MAIN
- STORMWATER / 96-INCH CSO
- GROUNDWATER COLLECTION PIPING /
- TEMPORARY TREATMENT PLANT LOCATION (ACCESS MANHOLE, EXTRACTION PUMP STATION OR CLEANOUT)
- SA-7 PERIMETER POOL
- SA-6 NORTH & SA-6 SOUTH VERTICAL STEEL HYDRAULIC BARRIER
- SA-7 SOIL/CEMENT BENTONITE BARRIER
- APPROXIMATE LOCATION OF HEXAVALENT CHROMIUM SOIL > 20 MILLIGRAMS PER KILOGRAM ON SA-7
- OPEN SPACE AREA WITH DEED NOTICE AND CONSERVATION RESTRICTION
- BLOCK 6 JCMUA PROPERTY
- BAYFRONT TRAILERS
- GROUNDWATER TREATMENT PLANT
- DEFERRED AREAS TO BE COMPLETED AFTER BULKHEAD REPLACEMENT / ROAD WIDENING/ JCMUA FUEL ISLAND RELOCATION
- AREA SUBJECT TO DEED NOTICE
- AREA SUBJECT TO A DEED NOTICE AND CONSERVATION RESTRICTION UNDER RIVER FRONT PARK, RIVERSIDE DRIVE AND KELLOGG STREET
- AREA GETS CONSERVATION RESTRICTION

NOTES:  
1. NFA = NO FURTHER ACTION  
2. SITE-WIDE SHALLOW GROUNDWATER IS SUBJECT TO A CLASSIFICATION EXCEPTION AREA (CEA) FOR BOTH CHROMIUM & NON-CHROMIUM CONTAMINANTS  
3. SA-6 NORTH AND SA-6 SOUTH WILL BE SUBJECT TO A DEED NOTICE FOR BOTH CHROMIUM AND NON-CHROMIUM CONTAMINANTS  
4. FOR SITE BOUNDARIES SEE FIGURE 4A+4B.



**FIGURE 5**  
CHROMIUM DEED NOTICE AND CONSERVATION RESTRICTION AREAS STUDY AREA SA-6 NORTH & 7 JERSEY CITY, NEW JERSEY



Amec Foster Wheeler PROJECT No. 3480720562 DRAWING: 3480720562-6100-DR60-0003	CHECKED/DATE: DEN 10/12/17
PREPARED/DATE: STR 10/12/17	

REV.	DATE	STATUS	BY

SA 6 NORTH EA-1	PART OF DN # 9
SA 6 NORTH EA-2/3	PART OF DN # 6 & 9
SA 6 NORTH TA 7	PART OF DN # 10
SA 6 SOUTH RT 440	PART OF DN # 2
SA 6 SOUTH BULKHEAD	PART OF DN # 4

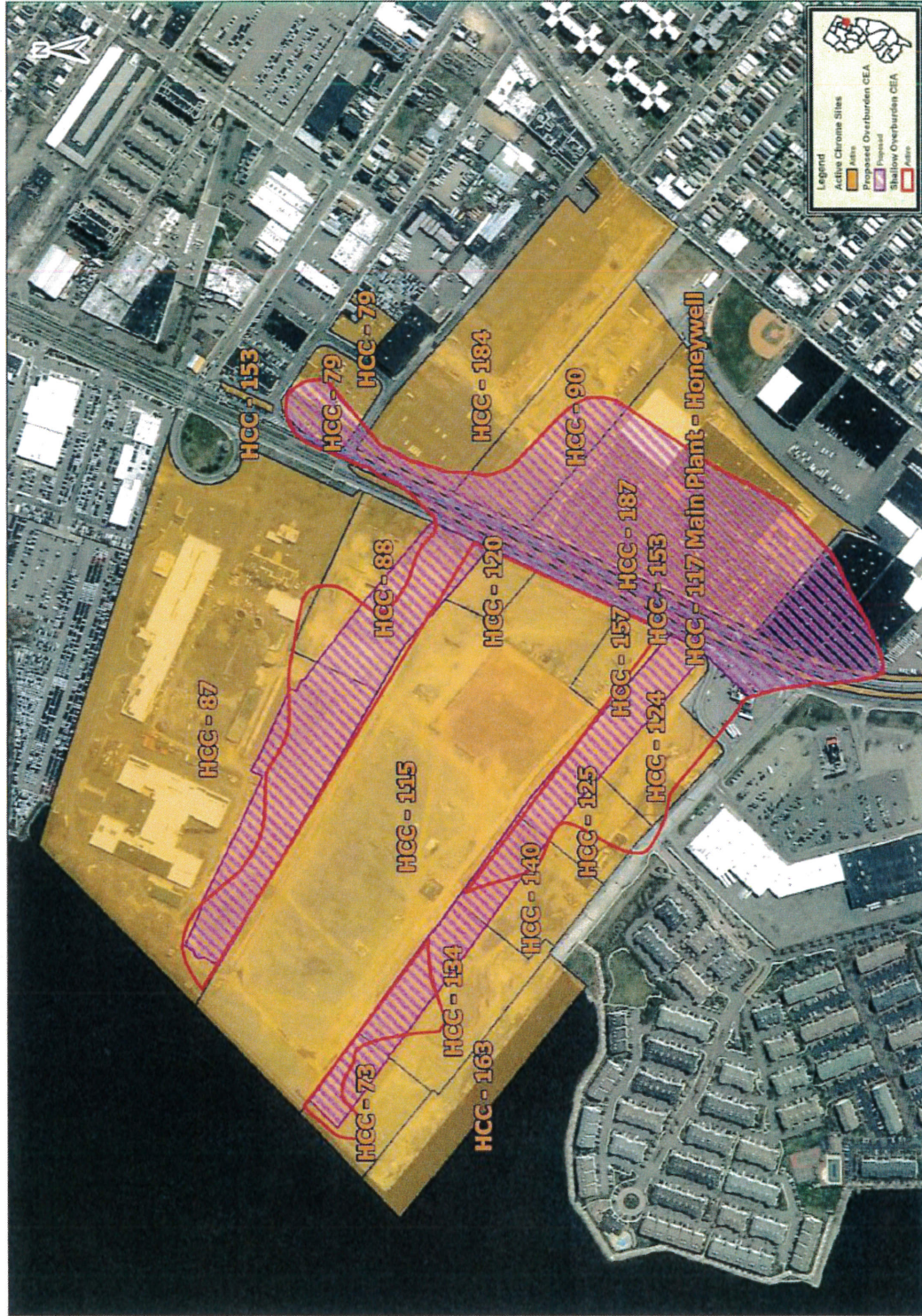
Copyright © 2017 by Amec Foster Wheeler. All rights reserved. This drawing is the property of Amec Foster Wheeler and is not to be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, without the prior written consent of Amec Foster Wheeler. This drawing is not to be used for any purpose other than that for which it was prepared. The user of this drawing is responsible for ensuring that it is used in accordance with the terms of the license agreement and for obtaining any necessary permits. The user of this drawing is also responsible for ensuring that it is used in accordance with the terms of the license agreement and for obtaining any necessary permits. The user of this drawing is also responsible for ensuring that it is used in accordance with the terms of the license agreement and for obtaining any necessary permits.

FIGURES SHOWING SHALLOW GROUNDWATER  
CLASSIFICATION EXCEPTION AREAS

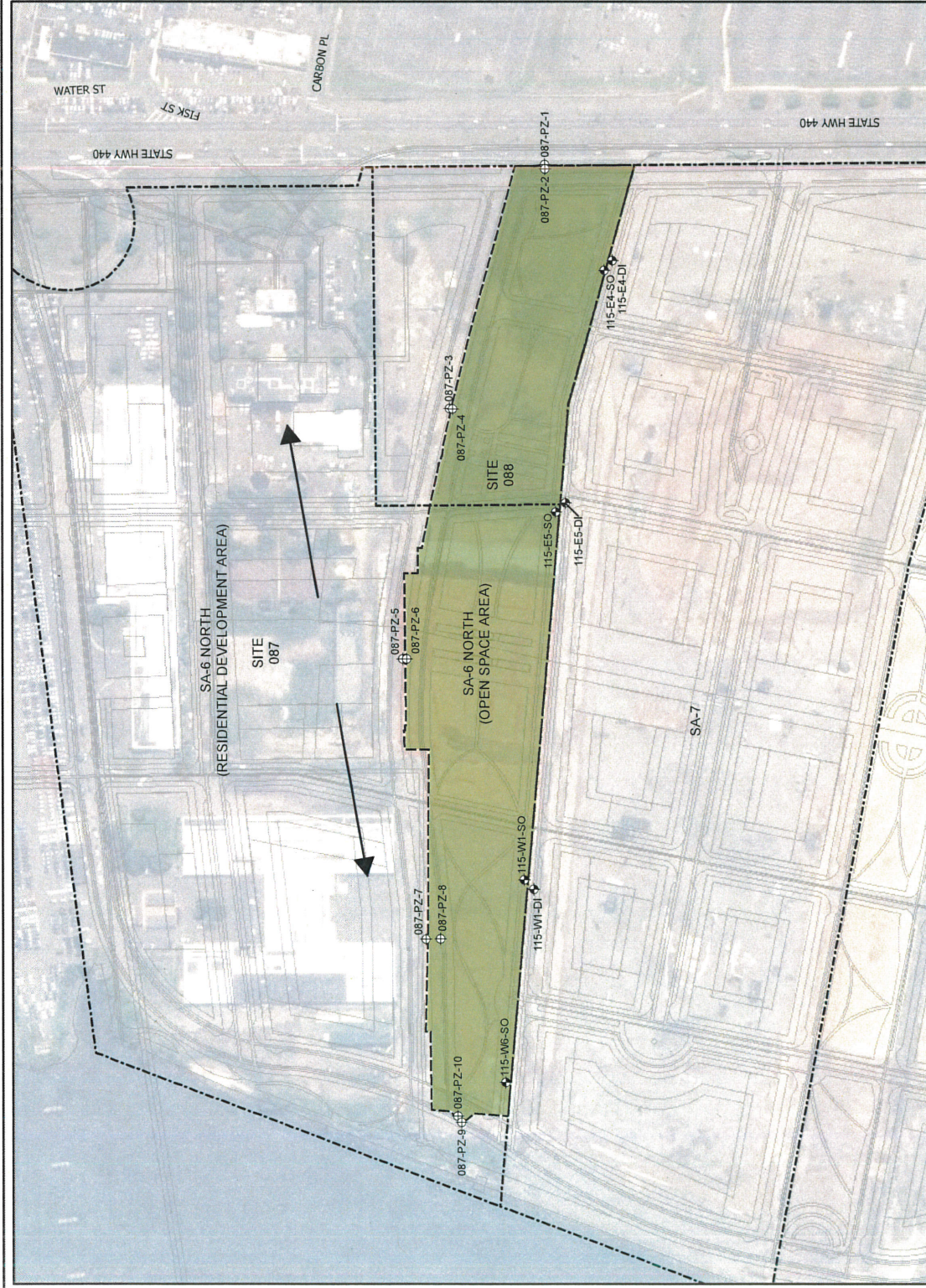




# Honeywell Main Facility Shallow Overburden Aquifer - PI #008809; Subject Item ID 167476







**LEGEND**

- ◊ EXISTING SHALLOW MONITORING WELL (FOR CHROMIUM REMEDY)
- ⊕ PIEZOMETER (FOR CHROMIUM REMEDY)
- VERTICAL HYDRAULIC BARRIER
- EXTENT OF CHROMIUM CEA
- - - SITE BOUNDARIES
- ➔ PREVAILING GROUNDWATER FLOW

**NOTES -**

1. HYDRAULIC BARRIER WALL PREVENTS GROUNDWATER FLOW.
2. LAYER OF STRATUM D/MEADOW MAT PREVENTS VERTICAL MIGRATION.



**wood.**  
 ENVIRONMENT & INFRASTRUCTURE  
 SOLUTIONS, INC.  
 200 AMERICAN MERIDIAN, SUITE 113  
 HAMILTON, NEW JERSEY 08619

PROJECT NUMBER:  
3480160524

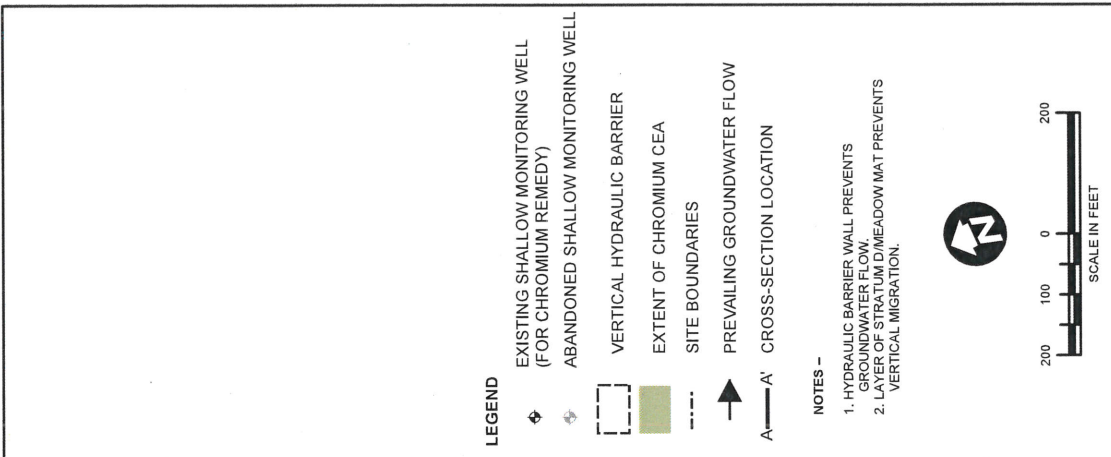
PREPARED/DATE:  
WSL/07/24/2016

CHECKED/DATE:  
NAW/07/24/2016

REV	NO.	DATE	STATUS	CHECKED BY	APPROVED BY

**EXHIBIT B-1A**  
**CLASSIFICATION EXCEPTION AREA MAP**  
 OPEN SPACE AREA  
 STUDY AREA 6 NORTH  
 JERSEY CITY, NEW JERSEY





- LEGEND**
- ◆ EXISTING SHALLOW MONITORING WELL (FOR CHROMIUM REMEDY)
  - ◆ ABANDONED SHALLOW MONITORING WELL
  - VERTICAL HYDRAULIC BARRIER
  - EXTENT OF CHROMIUM CEA
  - - - SITE BOUNDARIES
  - ➔ PREVAILING GROUNDWATER FLOW
  - A-A' CROSS-SECTION LOCATION

**NOTES -**

1. HYDRAULIC BARRIER WALL PREVENTS GROUNDWATER FLOW.
2. LAYER OF STRAW/FLY/MEADOW MAT PREVENTS VERTICAL MIGRATION.



**EXHIBIT B-1**  
**CLASSIFICATION EXCEPTION AREA MAP**  
 OPEN SPACE AOC  
 STUDY AREA 6 SOUTH  
 JERSEY CITY, NEW JERSEY

**wood.**  
 ENVIRONMENT & INFRASTRUCTURE  
 SOLUTIONS, INC.  
 200 AMERICAN METRO BLVD, SUITE 113  
 HAMILTON, NEW JERSEY 08619

PROJECT NUMBER: 3480160524	CHECKED/DATE: NAW 07/24/2018
PREPARED/DATE: WSL 07/24/2018	CHECKED/DATE: NAW 07/24/2018

REV. NO.	DATE	STATUS	CHECKED BY	APPROVED BY

NJDEP FORM CLOSURE LETTER FOR CHROME SITES



Form Closure Letter in Place of NJDEP No Further Action Letter  
for Remediated Chrome Sites Under Consent Decrees

\*\*Actual text will vary based on Site-specific considerations.\*\*

Company  
Name  
Address  
City, State Zip

Re: Hudson County Chromate Site -- Letter Confirming Completion of Remediation

Remedial Action Type: **[Restricted, Limited Restricted, or Unrestricted]**

**Scope of remediation: [Areas of Concern (followed by list of AOCs) and no other areas, or Entire Site ] {this section would also state if remediation is for CCPW only or includes other contaminants}**

COPR Site # (Study Area, Name)  
Site Address  
County  
Block(s) and Lot(s)  
Program Interest #  
Case Type: COPR

Dear [name]:

NJDEP has reviewed the [remediation documents] [company name] submitted on [date] regarding remediation of chromate chemical production waste (CCPW) at [site] or [areas of concern at site]. Based on the information provided, NJDEP concludes that the remediation of the CCPW is protective of public health, safety and the environment. NJDEP further concludes that the remediation of the CCPW satisfies the requirements of the Consent Judgment in [LITIGATION CAPTION] ("Consent Judgment"), the Technical Requirements for Site Remediation at N.J.A.C. 7:26E, and the Administrative Requirements for Remediation of Contaminated Sites at N.J.A.C. 7:26C. As a result, NJDEP has determined that the remediation of the CCPW is not subject to further review pursuant to N.J.S.A. 58:10C-21 and 58:10C-25.

By operation of law, a Covenant Not to Sue pursuant to N.J.S.A. 58:10B-13.2 applies to this CCPW remediation. The Covenant Not to Sue is subject to any conditions and limitations contained herein, and remains effective only as long as the real property referenced above continues to meet those conditions. This includes the need to continue to comply with any permit [name] is required to obtain. **[List Permit #s here (including Well Decommissioning Notice per N.J.A.C 7:9D-3, if applicable)]**

This letter serves as the functional equivalent to No Further Action letters issued by NJDEP pursuant to N.J.S.A. § 58:10B-13.1 and N.J.A.C. § 7:26C before those provisions were amended effective in 2012 to no longer authorize No Further Action letters. NJDEP recognizes this letter

as serving the same function as previously served by NFA letters, and satisfies the same legal obligations formerly met by NFA letters, for sites regulated directly by NJDEP.

Thank you for your attention to this matter. If you have any questions regarding this matter, please contact me at (609) 984-2905.

Sincerely,

Thomas J. Cozzi, Assistant Director  
Site Remediation NJDEP

**C: Local, County Environmental Health Act Agency and Regional Health Department(s)**  
**Mayor/Clerk/City/Township Council**  
**Municipal Clerk**  
David S. Doyle, NJDEP