

APPENDIX S

Trivalent Chromium Memorandum



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MEMORANDUM

To: New York State Department of Environmental Conservation (NYSDEC)

From: Integral Engineering, P.C.

Date: November 17, 2014

Subject: 520 West 28th Street Use of Trivalent Chromium SCO

Project No.: C231082

During the Supplemental Investigation and subsequent Remedial Investigation (RI) for the above-referenced project 31 soil samples were collected from within the material to be excavated as part of the Remedial Action. Samples from the Supplemental Investigation included 10 samples collected from 1-13.5 feet (ft) below grade, with the RI consisting of 21 samples collected from 0-10 ft below grade. Each of these samples were analyzed for speciated chromium.

Laboratory analysis indicated that no detectable concentration of hexavalent chromium was present in 25 samples. The remaining 6 samples were reported to have detections below the quantitation limit and were reported as estimated, well below the Unrestricted SCO even as estimated concentrations. These sample results from the entire site fill and soil volume show there is no hexavalent chromium impact present onsite.

The trivalent chromium data was also below the unrestricted SCO for all samples throughout the entire Site and shows that chromium impacts were not present in any site soil or fill using even the most stringent criteria.

Based upon this data for the entire Site, Integral discussed and agreed with the Department Project Engineer, the use of the trivalent Unrestricted SCO (30 mg/kg) for purposes of the end-point sampling comparison.

The FER will include a reference and description of the comparison to this SCO as well as reference to this memo.