

Response to Comments Table							
Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint							
Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken							
Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
1	NJDEP	4-2	4.5	1157 - 1162	This section makes the statement that not all of the Navy Hill site received DGM and intrusive investigation and goes on to say that, in some areas, magnetometer assisted surface sweep and construction support were conducted. These statements leave the reader wondering how much of the area was not investigated. If it is correct, inserting a statement such as, "MEC contamination on all of Navy Hill was evaluated in some appropriate way. The MEC contamination was either investigated with DGM and intrusive investigation of anomalies, surface sweep in difficult to access wetland areas, and construction support in areas that now contain structures" is recommended.	A	The suggested statement was inserted as recommended.
2	NJDEP	4-5	4.5.3.3	1296 - 1299	The following sentence is not easily understood and revision of this sentence is recommended: "The first two lines of each dataset were repeated as a test of the positioning accuracy unless those lines would not achieve approximately 4 percent data."	A	The sentence was revised as suggested.
3	NJDEP	4-6	4.5.4	N/A	This section describes a change to the work plan to the procedure for evaluating Type 2 anomalies. Although this change was approved by the USACE, it was not discussed with NJDEP following NJDEP's approval of the work plan. Was a field change request (FCR) developed for this change to the work plan? Did the work plan require development of an FCR to add this new procedure?  In addition, there are no FCRs referenced in the document or included in the appendices. Were no FCRs developed during the project? Were modifications made to the work plan that should have been documented in FCRs?	N	No formal FCRs, or corrective measure reports, were developed during the project and hence, have not been included in the EE/CA Report. Instead, corrective measures were informally requested to and approved by the USACE PM and the JV PM (as required by Section 3.4.29 of the Final Work Plan) via teleconference and/or e-mail. In the case of the type 2 anomalies, the informally requested and approved corrective measure for the type 2 anomalies was also approved by the USACE, Baltimore geotechnical specialist. The USACE PM approved the informal corrective measures approach, which was in compliance with Section 3.4.29 of the Final Work Plan, which did not outline a specific corrective measures report format. Section 3.4.29 also only requires that corrective measures be reported to the USACE, Baltimore District PM and the JV PM. The work plan did not specify that field changes would require amendments or modifications to the work plan.
4	NJDEP	4-8	4.5.5	1408 - 1409	Lines 1408 - 1409 describes excavating anomalies to a maximum depth of 4-ft. Were any anomalies found to be deeper than 4-ft. that were left in place? Please add this information to this section of the report.	A	Cultural debris (e.g., wires, concrete blocks with rebar) identified during the intrusive investigation, as well as anomalies that could not be reached (e.g., under roadway or sidewalk), are still in the ground at depths potentially greater than 4'. A statement to this affect was added to the report.
5	NJDEP	N/A	Table 4-1 and Table 4-3	N/A	In table 4-1 and 4-3 the discovery depths of three of the MEC are recorded as "unknown". Please explain why the depths are unknown. Since this information was required to be recorded it is possible that failure to record this information is a QC discrepancy that should have been identified and corrected following the first occurrence. Was this data collection part of the QC program and why wasn't the failure to record the MEC depth identified as a quality discrepancy?	A	The depths for the specific items identified as "Unknown" in Table 4-1 and 4-3 were known at the time they were discovered so no QC discrepancy existed that needed to be corrected. The inclusion of "Unknown" in the tables as the discovery depth was an administrative error made by the report writer. The known discovery depths will be included in the tables as follows: The item found in grid NHR14 was at 24"; the item found in grid CDC-D01 was at <1"; and the item found in grid CDC-B03 was found at 6".
6	NJDEP	4-12	Table 4-3	N/A	Does the entry "Practice BLU 26, 36, 59" refer to three different MEC that were found at one location. Please explain and modify this table entry to be more clear.	A	There was only one item found. The table entry was changed to "BLU 36" as reported in the Daily Report from 9 May 2008.
7	NJDEP	5-3	5.1.3.5	N/A	This section says, "... PTA's Safety Office requires that they be contacted prior to any personnel conducting intrusive/subsurface work at the installation." Page 5-7, section 5.1.6.1, lines 1950 - 1952 makes a similar statement. Please include the reference for this requirement (possibly a base instruction). It should also be referenced on Page 6-6 in the section on "alternative 3".	A	A reference to the Picatinny Arsenal Safety Office requirement was added in all three areas of the report identified. A specific requirement name or document is not included as the requirement has not been formally finalized.
8	NJDEP	6-1	6.1.1	2157-2167	Lines 2157 - 2167 gives basic information on the DGM survey, target selection and detection capabilities that appears to be out of place and not relevant to this discussion of Alternative 1. Deleting this paragraph is recommended because it confuses the reader by presenting information that was already covered in more detail in earlier chapters and because this information is relevant to the entire project and all alternatives, not just Alternative 1.	A	Paragraph was deleted as suggested.

Response to Comments Table							
Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint							
Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken							
Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
9	NJDEP	6-2	6.1.3	N/A	<p>The following comments apply to this section:</p> <p>a. Table 6-1 provides multiple scenarios where the "required UXO support" is determined to be either "low" or "moderate-high". However, according to EP-75-1-2 this determination is solely dependent on whether the probability of encountering MEC is judged to be "low" or "moderate to high". The report states that the probability of encountering MEC in the area covered by the EE/CA is "low" in the following sections:  ES-2, line 303  ES-3, line 373  1-5, line 582  6-1, lines 2132 and 2133  6-4, lines 2233, 2255, and 2267  6-5, lines 2287, 2302, 2318  7-5, line 2852</p> <p>It appears to be a contradiction to say that the MEC probability is "low" throughout the sites yet the type of construction support required is "moderate – high". Revising either the statements throughout the document concerning MEC probability or Table 6-1 is recommended.</p> <p>b. This section (6.1.3) should reference EP 75-1-2 as the Army Corps of Engineers guidance document on the subject of construction support. Also, the text of this section and Table 6-1 should be checked to ensure that</p> <p>c. The decision criteria presented on Table 6-1 is very complex and it appears</p>	C	<p>a. Table 6-1 was taken directly from the approved ESS and provides guidance for the entire 1926 explosion area, not just the area covered by the EE/CA Report. The default for sites within the 1926 explosion area is "moderate to high" probability but evaluation/investigation allows reduction in the probability assessment to "low". All areas covered by the EE/CA Report are now considered to be "low" probability for encountering MEC.</p> <p>b. Reference to EP 75-1-2 was added to Section 6.1.3 and the text was checked to ensure it is in compliance with EP 75-1-2.</p> <p>c. EP-75-1-2 guidance was used to create Table 6-1. Because of the complexity and number of planned projects within the 1926 explosion area, a table was prepared to show USATCES and DDESB the decision process that would be used when determining construction support requirements within the area. The implementation process as the reviewer describes is already required for funding and planning purposes; therefore, it is used for evaluating the type of construction support required prior to the preparation of a MEC construction support p</p>
10	NJDEP	7-1	7.2	N/A	Adding a requirement to develop and enforce a site-wide instruction on construction support for PTA to page 7-1, section 7.2 is recommended.	A	Requirement to develop and enforce a site-wide instruction for construction support was added to the report as suggested.
11	NJDEP	N/A	9	N/A	There is no documentation of quality control activities performed during the project. NJDEP requests adding an appendix to the document that includes the QC reports required by the work plan and referencing that appendix in Chapter 9.	A	The following statement has been added to the Report, "Quality control activities for the project were recorded on 1) daily reports that discuss daily QA/QC activities, 2) 948 forms that show government's acceptance of completed grids, 3) UXO QC results included in the Anomaly Tracking Sheets, and 4) DGM Data and Dig Sheet QC Checklist. These are all included in the Appendices."
12	NJDEP	N/A	N/A	N/A	NJDEP concurs with the recommended alternative: Alternative 3 – Public education and MEC support for construction activities.	N	Comment does not require a response.
13	USEPA	N/A	General	N/A	It is assumed that the areas addressed by the EE/CA will be also be included in the future MMRP RI/FS. The selected remedy of education and MEC construction oversight is satisfactory as an interim remedy but eventually these cleared areas must also go through the CERCLA RI/FS process.	A	The EE/CA will be public noticed and an Action Memorandum prepared to close out the EE/CA process as an interim remedy. The results from the EE/CA will be incorporated into the RI/FS and a final remedial response will be incorporated for the investigation area into the ROD as part of the CERCLA process for the MMRP sites. However, it is not anticipated that further intrusive MEC investigation will be conducted in the areas specifically covered by the EE/CA because of the impact on residents and mission as well as the low probability of encountering MEC.
14	USEPA	N/A	5	MEC Exposure Pathway Analysis	According to this analysis, PTA personnel do not engage in intrusive activities such as digging or excavation. Is there actually a prohibition of Picatinny employees engaging in these activities?	A	There are dig restrictions requiring approved dig permits prior to any digging or excavation for all of Picatinny Arsenal. As a result of the EE/CA activities, the probability of encountering MEC in the investigated areas is low; however, based on the MEC found in the subsurface during the EE/CA, the MEC Exposure Pathway Analysis and report text will be adjusted to identify a potential complete pathway for subsurface MEC for all receptors other than biota. A surface clearance was conducted in the areas covered under this EE/CA; therefore, the MEC Exposure Pathway Analysis and report text will be adjusted to identify an incomplete pathway for surface soil for all receptors.
15							
16							
17							
18							
19							
20							

**Response to Comments Table**  
**Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint**

Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken

Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
32							
33							
34							
35							

Response to Comments Table							
Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint							
Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken							
Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
36							
37							
38							
39							
40							
41							
42							
43							
44							
45							
46							
47							
48							
49							
50							
51							

**Response to Comments Table**

**Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint**

Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken

Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
52							
53							
54							
55							
56							
57							
58							
59							
60							
61							
62							
63							
64							
65							
66							
67							

**Response to Comments Table**

**Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint**

Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken

Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79							

Response to Comments Table							
Draft Final EE/CA Report - Picatinny Arsenal RCI Housing Footprint							
Response Code: A = Agree with comment D = Disagree with comment C = Comment requires clarification N = Comment noted, no action required or taken							
Comment Number	Commenter	Page(s)	Section	Line(s)	Comment	Response Code	Response
80							
81							
82							
83							
84							
85							
86							
87							