



Final Minutes and IAG schedule (UNCLASSIFIED)

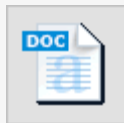
Wednesday, September 22, 2010 11:45 AM

From: "Gabel, Ted Mr CIV USA IMCOM" <ted.gabel@us.army.mil>

To: Roach.Bill@epamail.epa.gov, "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>, "Jim Kealy" <Jim.Kealy@dep.state.nj.us>, "Joe Marchesani" <Joe.Marchesani@dep.state.nj.us>

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 3 Files (417KB)



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Classification: UNCLASSIFIED

Caveats: NONE

Only Bill get hard copy unless requested.

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DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, PICATINNY
PICATINNY ARSENAL, NEW JERSEY 07806-5000
September 20, 2010



REPLY TO
ATTENTION OF

Environmental Affairs Division

SUBJECT: Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/Interagency Agreement (IAG) Administrative Docket No. II-CERCLA-FFA-001-04: Submittal of October IAG Schedule and Final minutes from September 17th: Review is ER,A-eligible

Mr. William Roach
U.S. Environmental Protection Agency
Region 2
290 Broadway, 18th Floor
New York, NY 10007-1866

Mr. Gregory Zalaskus
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
Bureau of Case Management,
401 East State Street, Floor 5
P.O. Box 028
Trenton, New Jersey 08625-0028

Dear Sirs:

Enclosed for your records are final minutes from our technical meeting of September 2nd in Edison. The draft Army-approved document was submitted electronically on 8 September was revised based on comments from Tracy Grabiak and Joe Marchesani of the NJDEP and EPA.

Also enclosed is an updated version of the **IAG Schedule** for October. I ask you both to review for accuracy regarding the status of your reviews of documents. We will be providing a priority list for your reviews shortly. Please note that the Army/ARCADIS will not be providing responses to EPA comments on a number of soil related feasibility studies until the latest issue is resolved. Any questions or comments please call or email me.

Sincerely,

Project Manager for
Environmental Restoration

Enclosures

CC (electronically only):
Mr. Jim Kealy, NJDEP
Mr. Joe Marchesani, NJDEP
Ms. Barbara Dolce, TAPP Contractor\
Mike Glabb

**Picatinny Arsenal
EPA/DEP Team Meeting
September 2, 2010**

Final Meeting Minutes

Attendees: Francis Coulters – USAEC
Tom Crone – ARCADIS
Nancy Flaherty – USACE
Ted Gabel - Picatinny
Tracy Grabiak – NJDEP
Jim Kealy - NJDEP
Tim Llewellyn – ARCADIS
Joe Marchesani – NJDEP
William Roach – USEPA
Emily Schiffmacher – USACE

Via Phone: Nadine Weinberg – ARCADIS
Chuck Nace - USEPA

Agenda Items: The following sites were discussed and decisions reached

PICA 013 (Site 78):

- Vapor Intrusion (VI) at Building 91
 - Ms. Weinberg summarized the actions taken thus far to evaluate if a potential VI problem exists at PICA 013 (Site 78). These actions and subsequent findings are summarized in the VI Memo, prepared by ARCADIS. Ms. Weinberg summarized the memo, including the sampling methodology, the data set, and the three lines of evidence presented.
 - Mr. Gabel also pointed out that he recalled vapor intrusion calculations being performed at the remedial investigation (RI) stage. He recalled they demonstrated an incomplete pathway. Mr. Gabel after making the statement showed Mr. Kealy the 3rd paragraph of Section 2.8,1 of the draft ROD (page 2-7) that stated that “a supplemental risk assessment was performed subsequent to the sodium lactate study to re-evaluate the exposure risk for an on-site worker associated with exposure to the then (2007) current concentrations of VC in the gw via ingestion, dermal and **inhalation of indoor air.**
 - Ms. Grabiak stated concerns stem looking at the overall site conceptual model, as indicated in the email from NJDEP on 8/19/10. Specifically she voiced concerns about the following:
 - the possible meaning of the indoor air data given the sampling method
 - that the location of the original source area is unknown, and TCE may have been used in the building in the past;
 - NJDEP has seen that in some situations soil gas levels can remain quite high for longer than usual, even though groundwater levels have decreased (due to a remedial action);
 - the location of the small machine shop and loading docks and the scarcity of groundwater data between those possible source areas and the highest of VOCs levels now in the plume; and, that there are no groundwater sampling points within 100 feet of building on the entire southern side of the building; and,
 - the age of the groundwater data.
 - Ms. Weinberg pointed out that following NJDEP guidance and using the revised screening level (which incorporates the newer USEPA toxicity value) there is no reason to pursue sub-slab sampling at this site. Ms. Grabiak stated that NJDEP has not reviewed the revised screening level.
 - Regarding additional sampling and the USEPA review of the VI Memo, Mr. Nace referenced USEPA VI guidance (2002) which defaults to the MCL as a screening value

- to be applied within the 100 feet buffer area around the building. However, Region II policy (since 2002) includes using a guidance number of 0.25 ppb, although this has not been publicly released. Ms. Weinberg requested clarification on the origin of this guidance and its applicability given this policy is not public knowledge.
- Upon further review of the guidance, Mr. Nace referenced “page 31 secondary screening question #2, (a.k.a. the 50X rule)” which increases the screening level from 0.25 ppb to 12.5 ppb and would effectively screen out this site as the 12.5 ppb contour is well outside the 100 feet buffer.
 - In conclusion, Mr. Nace stated that based on the secondary criteria, the site could be screened out but he was also concerned with public comment and lack of sub-slab data..
 - Following a group discussion, there was a consensus that the vapor intrusion risk at this Site seems quite low. However, given all other factors (the age of the data, the lack of a source area, and public concern), the group agreed that three sub-slab samples should be collected.
 - Sampling will include one sample near the former underground storage tanks (USTs), one near the machine shop, and one at the other end of the building. Final locations will be biased toward occupancy. No ambient air sample will be collected.
 - NJDEP has a specific analyte list with specific procedures and approved laboratory, which is slightly different than USEPA’s analyte list and laboratory requirements
 - The group agreed to use the NJDEP analyte list and NJDEP certified laboratory. Samples will be collected over a 24 hour period and a 6 liter bottle will be used (although this is ultimately dependent on detection limits).
 - The group agreed that if sub-slab data indicates no there is no VI pathway, then the Site is considered remedy in place (RIP) and CERCLA documents (ROD and Remedial Design) can be finalized. However, if the sub-slab data indicates a VI problem may exist, the final remedy will need to be revised to account for VI.
 - In preparation of briefing the Building 91 occupants, Mr. Gabel requested information from USEPA outlining why USEPA screening levels differ between programs (OSHA and CERCLA). USEPA stated that the timing of the request (during the close of the fiscal year) would make it difficult to provide this but provided the following information at the meeting.
 - The difference between OSHA and CERCLA screening levels is chemical specific. The majority of OSHA values date to 1960, assume personal protective equipment (PPE) will be worn, and neglect current toxicity values. The CERCLA program is trying to update screening levels using current toxicity values and the assumption that no PPE is worn. The two different screening values (OSHA and CERCLA) represent a difference of 1×10^{-2} versus 1×10^{-6} cancer risk.
 - The group agreed that the Draft Final ROD can be revised to remove the Industrial Hygiene level air sampling conducted inside the building by the Army, and focus on the CERCLA studies including provision of the findings of the sub-slab sampling.
 - Remedial Design (RD)
 - Mr. Llewellyn summarized the RD for monitored natural attenuation (MNA). The remedial action is planned for September 2010. He highlighted the findings of a recent site inspection, during which two marsh piezometers in Green Pond Brook could not be located and the other piezometer is currently in the middle Green Pond Brook (GPB) and difficult to access safely.
 - After reviewing the rest of the MNA network, NJDEP agreed with removing the three piezometers from the MNA network. The group concluded that surface water samples will still demonstrate that the receptor (GPB) is protected.

- NJDEP requested that the remaining piezometer be removed as it will no longer be needed. ARCADIS agreed.
- USEPA deferred to NJDEP's assessment and concurred.

PICA 001/011/057 – Discussion of ARAR Language:

- Mr. Llewellyn summarized Army's position, proposed language, and proposed agreements (which include agreements to all USEPA and NJDEP requests regarding ARAR language and remedy selection); and asked if all the sites may now move forward.
- Mr. Roach informed the group that the current USEPA clarifications and guidance on ARAR language provided from Walter Mugdan (Director of the Emergency and Remedial Response Division at EPA Region 2) on 19 May 2010 is no longer valid. Document approvals (as recently as August 2010) are being reevaluated which includes the signing of the Group 1 ROD.
 - EPA stated that in a recent telephone conversation between upper management, that NJDEP maintained that once risk was exceeded (greater than 10-4) at one single operable unit at Picatinny, then ARARs would need to be addressed facility wide. Furthermore, EPA HQs has stated that LUCs (other than some type of installed cover) do not address chemical-specific ARARs.
 - ARCADIS pointed out that under CERCLA the SRS should not be recognized as ARARs as there is no unacceptable risk for the current and reasonably anticipated use (industrial) at these sites. The only reason the SRS are stated to be ARARs was as a result of negotiations with NJDEP and USEPA over the past year in order to break a deadlock on language within the Decision Documents. It was noted that USEPA had indicated on several occasions previously that calling the SRS ARARs as part of a negotiated settlement would not lead to remedy changes as stated in the 13 July email from EPA to the Army, and as part of the approval of the Shaw 25 Site FS on 25 August. ARCADIS further pointed out that the remedies proposed had been accepted by all parties in the past and go substantially beyond simple land-use controls with several sites proposed for removal actions or soil cover. The Army team expressed frustration at the continued inability to reach a negotiated settlement on these sites despite conceding to a series of requests from both USEPA and NJDEP over the past several years.
 - Mr. Roach briefed the group that USEPA and NJDEP upper management are scheduling discussions. USEPA and the Army (USAEC) are also trying to schedule a meeting to determine the application of Land Use Controls.
 - USEPA has been told by NJDEP management that NJDEP may not be concurring on these remedies which may prevent construction completion at Picatinny since the state would presumably not concur.
 - After reviewing the Army's current position, proposed language, and proposed remedies which incorporated hotspot removals and engineering controls that NJDEP requested in December 2009, Mr. Kealy was going to discuss NJDEP's position with his management in hopes of reversing NJDEP's non-concurrence position.
- The group agreed that ARCADIS can email out the meeting slides for use at regulator management meetings. These slides present the Army's position, proposed ARAR language, and proposed remedies.
- It was agreed that USEPA needs to provide a final position on ARARs and how to apply LUCs for there to be any further progress at these sites.
- ARCADIS and the Army will discuss proceeding with public noticing the 25 Site Group PP, regardless of USEPA's disapproval of the language, and possibly, the remedies.

PICA 057 – Lakes Feasibility Study:

- Per previous USEPA comments, the resubmitted submitted Feasibility Study (FS) will recommend NFA as the remedy for the EOD Pond and Lake Denmark. Additionally, it was

noted that on further review NFA would also be appropriate at Lake Picatinny following removal of sediments at Site 40. These revisions are based on the lack of unacceptable risk for unrestricted use (recreational) at Picatinny Lake after sediment removal. This approach for Picatinny Lake is consistent with USEPA comments on the NFA remedy for the EOD Pond and Lake Denmark.

- NJDEP would likely concur on revision and remedy. Mr. Kealy plans to review document in the next few weeks.
- USEPA agreed with resubmitting the document as ARCADIS proposes.

PICA 204 Mid-Valley Groundwater:

- Mr. Llewellyn summarized the current CSM at Mid-Valley and the field activities completed to date.
- Data indicates that 171MW-12 is a clean, up-gradient well, and 171MW11B, screened at 180 to 200 feet below ground surface provides vertical delineation of the plume. Mr. Marchesani concurred.
- Mr. Marchesani shared his observation that more water was encountered during March drilling than compared to the June drilling event. He hypothesized the flow in fractured zones may vary seasonally and should be accounted for during remedy design.
- Mr. Marchesani asked why both hydrasleeve and PDBs are being used. ARCADIS confirmed this practice is consistent with the procedures used in the past at this site and allows ARCADIS to get data quickly (with the hydrasleeve and local laboratory) and then confirm the data with samples from the PDBs two weeks later.
- After reviewing the proposed pump test, Mr. Marchesani would like to see a pressure transducer added to 171MW-12. ARCADIS agreed.
- Mr. Marchesani pointed out that because the conceptual remedy re-injects into fractured rock and re-circulates, the design is technically a closed loop system and there is some additional flexibility to re-inject TCE above 1 ug/L. ARCADIS will review this and incorporate into the RD if appropriate.
- Mr. Gabel questioned if the regulators foresee a problem with VI at this site, similar to the issue that was raised during the ROD preparation at PICA 013 (Site 78). Without a CSM, USEPA and NJDEP were unable to comment. ARCADIS will include VI in the new CSM.

PICA 008 (Group 3) Groundwater:

- Mr. Llewellyn summarized remedy activities completed to date and summarized the planned injection event.
- The group concurred on the planned remedy and the injection schedule for the EVO.
- Mr. Llewellyn asked USEPA and NJDEP if there is a mechanism which would allow for the RD and Interim Remedial Action Report (IRAR) to be submitted as a single document.
 - USEPA requested a RD be submitted separate from the IRAR and Arcadis concurred.

Area D GW (PICA 076) – Discussion of Pump and Treat System Decommissioning:

- Mr. Llewellyn summarized the pump and treat (P&T) decommissioning process to date.
- Mr. Llewellyn asked the group for guidance on closing the discharge and allocation permit equivalence which previously governed operations of the P&T system.
 - Mr. Marchesani suggested preparing a letter stating that the Army's wishes to cease discharge.
 - Mr. Gabel provided the permit to NJDEP and Mr. Marchesani offered to contact the appropriate group at NJDEP for guidance.
 - Note that following the meeting Mr Marchesani informed the Army that the permit cannot be closed until the pumps are pulled from the wells and photographic evidence of the action was provided to NJDEP. ARCADIS agreed to evaluate pulling these pumps and will discuss closing out the permit with the Army.

PICA 079 (Group 1) Remedial Design/Action:

- Mr. Crone presented the status of the ROD and RD for the site.
- Mr. Roach stated that he was unsure if the PICA 079 (Group 1) ROD would be signed, or if signature would be tied the emerging USEPA guidance on ARAR language and LUC application.
- Arcadis noted this development.
- Mr. Crone then reviewed the NJDEP and USEAP comments and approved responses on the RD. All responses were agreed to and the RD can be finalized. If USEPA provides additional comments on the ROD a “Final, Revision 1” RD will be produced at that time.
- Mr Marchesani noted that if the MNA data over the first year did not indicate contaminant concentration reduction then an injection system may be requested. Arcadis noted that if a remedy is ineffective then contingency plans would be required but also suggested a longer time period be considered before changing the remedy.
- Remedial Action (soil excavation and off-site disposal with LUCs) is underway and should be completed September 10, 2010.

5-Year Review:

- Mr. Crone presented the proposed schedule and format of the 5 year review. Both the schedule and the format were acceptable to USEPA. The accepted format will present Arsenal-wide information in the first three sections (Introduction, Site Chronology, and Site Background), other Five-Year Review required sections (Remedial Actions, Progress Since Last Review, Document Review, Data Review and Evaluation, Summary of Technical Assessment, Issues, and Recommendations) will be grouped by specific site, and the document will conclude with three Arsenal-wide sections (Protectiveness Statement, Five-Year Review Process, and Next Five-Year Review).
- A brief site-specific protectiveness statement will be included in each site discussion as well as the overall facility-wide protectiveness statement

Brief Updates on all Other Sites

- Mr. Llewellyn and Mr. Crone provided a brief summary of the progress several other remaining PBC sites. No new data was presented.

IAG Schedule and Soil Management

- Mr. Gabel provided a hard copy of the IAG schedule that had been provided in August and asked that it be reviewed.
- Mr. Gabel discussed soils management issues particularly with Mr. Kealy including the following:
 - GIS Data base of excavated excess soils is being developed by Chugach
 - Recent soil piles data show incidental level of NJDEP exceedances. These soils are now ‘stored’ at the heliport

Next Meeting:

- Next RAB meeting is on October 7, 2010 at 6:30 PM at the Hilton Garden Inn, Rockaway, NJ
- The date of the next technical meeting was not discussed.

Action Items:

Action	Responsible Individual(s)	Due Date
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Action	Responsible Individual(s)	Due Date
ARCADIS will collect three sub-slab samples, work plan will be submitted first	Llewellyn/Weinberg	ASAP
USEPA to provide information in writing to Mr. Gabel describe difference b/w CERCLA and OSHA.	Nace/Roach	Completed – verbally at meeting via phone
NJDEP will discuss current status and remedial strategies with management	Kealy	
ARCADIS will submit slides to USEPA and NJDEP for use in management meetings	Llewellyn	9/9/10
Mr. Marchesani will send email to NJDEP obtain guidance on closing out water allocation and discharge permits	Marchesani	Guidance provided via email on 9/3/10

**Installation Restoration Program
IAG Schedule for
September submittal
Picatinny Arsenal**

Name of Document	Date or Proposed Date	Comment or Army status or update based on last IAG Schedule	EPA status	NJDEP status
I. Remedial Investigative Workplans and Reports				
1. Remedial Investigation Workplan for the MMRP for Picatinny	September Meeting canceled; expected in October.	Task has been awarded to WESTON INC.		
2. MTBE Groundwater Report	9/7/'10	Wells sampled during week ending May 14 including 600 Gw wells MTBE data report submitted for concurrent Army and regulatory review.	Report needs review. EPA requests that MTBE be addressed within 600 Hill Proposed Plan and ROD. Army will comply. Workplan approved.	Report needs review Workplan approved.
3. Skeet Range SI Data Report	9/8/2010	SI data report prepared for soil, sediment and groundwater samples collected in June. Skeet range data report submitted for concurrent Army and regulatory review.	Report needs review.	Report needs review.
4, Skeet Range RI WP	10/2010	RIWP will include additional sampling to delineate the extent of contamination and to characterize the risks at the site.		
5. Site 34 Burning Grounds Sampling Results	10/'10	Last groundwater data being collected on 8/17.		
6. Supplemental pre-design work plan for Mid-Valley Groundwater	Emailed July 22 nd 2010	Emailed July 22 nd 2010. Work ongoing. Army responded to NJDEP request in July.	Discussed at technical meeting.	NJDEP conducted site visit and request table of recent results of sampling.

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7, 600 Hill Pre-design investigative Workplan	09/2010//	Based on EPA's request for investigation under the rock pile		
II. Feasibility Studies				
8. Feasibility study for 25 Sites	Final FS submitted 9/3/10	<p>Issues brought up on 2 September meeting will not affect the finalization of this report.</p> <p>Army provides responses to comments including recent EPA -NJDEP position ARARS.</p> <p>Tracked changes supplied to EPA and NJDEP.</p> <p>Shaw has finalized changes based on programmatic agreements will be submitted by early May.</p>	Approval provided in August 25, 2010 email.	<p>NJDEP provides conditional approval in 9/9/'1 email from Jim Kealy.</p> <p>NJDEP approves Dog Pound report on June 8th.</p>

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Name of Document	Date or Proposed Date	Comment or Army status or update based on last IAG Schedule	EPA status	NJDEP status
9. Feasibility Study for Sites 142, 139, 106, 146, 144 or Consolidated Site PICA -111	Resubmitted on 5/11/2010.	<p>Considered Final. Last time mentioned in schedule</p> <p>Revision based on EPA comments to be submitted in May</p> <p>See older IAG schedules for information on history of document submittal.</p> <p>Revised based on MV dispute language and August 2009 PICA 01 FS language.</p>	<p>EPA approves FST on 5/18 after revision and tracked changed submittal by Army</p> <p>EPA provides comments that require modification and additional active alternative.</p> <p>Requires approval or comments</p>	NJDEP not reviewing until issues are resolved regarding NJDEP state number as ARARs.
10. Feasibility Studies (now called the 5 Site FS) (PICA 11, 85, 91, 97, and 108)	9/4/09	As a result information provided by EPA at the September 2, 2010 meeting responses to EPA comments and red lined strike out text will not be submitted until EPA provides clear and concise guidance on ARARs and application of LUCs or approval of the PICA LUC Group Proposed Plan (Item No. 16).	<p>EPA provided comment on 12/1/09</p> <p>Now affected by EPA position on NJDEP ARARs</p>	NJDEP not reviewing until issues are resolved regarding NJDEP state number as ARARs.

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11. Feasibility Study for PICA 11 LUC Group of Sites...Now called the '45 Site FS') (PICA 11, 50, 75, 91, 97, 108, 122, 134, 135, 136, 162, 175, 200, 209)	12/'09	Submitted 12/24/09 As a result information provided by EPA at the September 2, 2010 meeting responses to EPA comments and red lined strike out text will not be submitted until EPA provides clear and concise guidance on ARARs and application of LUCs or approval of the PICA LUC Group Proposed Plan (Item No. 16). .	EPA provides comments on April 7, 2010 Now affected by EPA position on NJDEP ARARs	NJDEP not reviewing until issues are resolved regarding NJDEP state number as ARARs.
12. Lake FS (PICA 15, 57, 195)	10/30/09 to be resubmitted in October 2010	Discussed at 2 September meeting Final FS will be submitted in October 2010 Responses to EPA comments submitted in July 2010 Draft Final Fst submitted to regulators 10/30/09	EPA provides OK to responses to comments except for one comment that had been addressed in 25 Site FST rtcs. Comments received 12/17/09	Approval by Joe Marchesani of NJDEP in March.

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13. Non Lakes Feasibility Study (which includes TECUP Buildings))	12/2009	Submitted to EPA/DEP on 12/30/09 As a result information provided by EPA at the September 2, 2010 meeting responses to EPA comments and red lined strike out text will not be submitted until EPA provides clear and concise guidance on ARARs and application of LUCs or approval of the PICA LUC Group Proposed Plan (Item No. 16). .	EPA comments provided on 3/10/10.	Needs DEP review.
III. Proposed Plans & Records of Decision and proposed plans (with Technical Memorandums)				
14. Proposed Plan for the PICA 1 LUC Group (Arcadis 25 Site FS)	1/2010	Based on RTCs and discussion on 2 September Proposed Plan public noticing is on hold. Army responded to EPA comment in August Submitted to EPA/DEP 2/26/10	EPA provides comments to response to comments and discussed critical LUC issue at 2 September meeting. EPA provides review on July 1 st .	Needs DEP review

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Name of Document	Date or Proposed Date	Comment or Army status or update based on last IAG Schedule	EPA status	NJDEP status
15. Group 1 Record of Decision	28 July	<p>Army signed ROD and sent to EPA on July 28th2010</p> <p>Signed ROD will be public noticed in October</p>	<p>Signed by EPA September 17, 2010</p> <p>EPA OK tracked changes will need to sign ROD</p>	<p>Letter sent in May dated in March concurring on Action</p>
16. Group 3 Record of Decision	12/2009	<p>Army signed ROD on July 9th</p> <p>Signed ROD will be public noticed in October</p>	<p>EPA signed ROD 8/2/10</p> <p>EPA provides concurrence on Tracked Changed document on June 22</p> <p>EPA provides comments on April 22, 2010</p>	<p>Letter sent in May dated in March concurring on Action</p>
17. Proposed Plan for PICA-111	Draft Final Proposed Plan was submitted to Regulators on 5/20/10	Fst was submitted in March.	Needs review	Needs review

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19. Proposed Plan for 600 Area	02/'10	<p>Proposed Plan on hold until Workplan and resulting FS amendment is approved.</p> <p>Army has agreed to clear rock pile in order to investigate area. See investigative plan above.</p> <p>Army provides responses to EPA comments on 5/18.</p> <p>Draft proposed plan was submitted to the regulators for concurrent Army/regulatory review. Hoping to Public Notice this year.</p>	<p>EPA respond to comments on 6/24</p> <p>EPA provides comments on April 22n PP that significantly would change the approval of the FST.</p>	Needs review.
20. ROD for PICA 13 or Site 78	07/26/'10	<p>Army will conduct VI study in building 91; discussed at 2 September meeting.</p> <p>Draft Final ROD submitted 7/26/10</p>	EPA requires VI study based on concern at public meeting.	<p>NJDEP provides correspondence asking for VI study before concurrence.</p> <p>Need concurrence letter. Briefing memo provided.</p>

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21. ROD for 600 Area	TBD	Completion of the ROD will be contingent upon approval and public notice of the Proposed Plan which will after the completion of the investigation.		
IV. Remedial Designs				
22. Wetland Mitigation Plan	9/3/09	Final planting to be in September 2010. Final Mitigation Plan will be submitted in October.	EPA (BTAG) comments received 9/10/09 and discussed at 9/17/09 meeting. Document can be finalized.	
23. Remedial Design for PICA 079 (Group 1)	9/20/10	Excavation completed at site.	EPA approves final design on 21 September EPA approves responses on 26 August Army provided responses to comments provided 25 August	NJDEP provides OK to responses on 27 August.
24. Remedial Design for PICA 013 (Site 78)	7/26/'10	Based on submitted ROD	Needs review	Needs review.

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24. Remedial Design for PICA 008 (Group 3)	4/6/'10	RTCs provided to EPA/DEP on August 3 rd , 2010. Design can be finalized upon receipt of baseline data (collected July 2010)	EPA provides review on June 22 based on Army responses to May 6 th comments.	NJDEP provides review April 22 nd with conditional approval.
IV. Remedial Reports, IRARs and Removal Action Reports				
25. ICM Removal Action Report	9/10	Report being completed by Arcadis		
26. Site 31/101 (PICA 72) Remedial Action Report	8/16/10	Submitted on August 16, 2010	Approved by EPA on 9/7/'10	Needs review
27. Group 1 (PICA 79) Interim Remedial Action Report	11/2010	New document being prepared by ARCADIS.		

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28. Group 2 3 (PICA 008) Interim Remedial Action Report	11/2010	New document being prepared by ARCADIS.		
29. GPB/BSB (PICA 193) 2008 Annual Report	11/'09	Responses provided to EPA on April 27, 2010. Page drops will be provided with submittal of the 2009 Annual Report. Submitted on November 16, 2009 Last time mentioned in schedule.	EPA approves responses on 5/05/'10 EPA (BTAG group) provides comments on 1/26/2010:	Report is acceptable per Kealy email dated April 28, 2010.
30. Annual LUC Certification Report	6/10/'10	Submitted white cover.	Needs review	Needs Review
31. Area B Annual Report	2/4/'10	Submitted white cover.	Needs Review	Needs Review
32. Area E Annual Report 2009	2/'10		Needs Review	Approved April 22, 2010
33. GPB/BSB (PICA 193) 2009 Annual Report	8/5//10		Needs review	Needs review
34. Area C Groundwater Interim Remedial Action Report	08/17/10	New report with GW data from the first LTM sampling event conducted in January	Approved by EPA September 7, 2010	Needs review

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Picatinny Arsenal**

Name of Document	Date or Proposed Date	Comment or Army status or update based on last IAG Schedule	EPA status	NJDEP status
35. Area C Semiannual Groundwater Data Report, Winter 2010.	05/10/2010	Not considered high priority review.		
IV. Other Documents and Submittals				
36. Revised CEA Biannual Report	7/2010	Report will need to be approved by NJDEP before sending to all neighboring communities		Needs review or approval.
37. Draft Five-Year Review for 2011	2/2011			