

September 2, 2010 Picatinny Team Meeting

Edison, New Jersey



MULTI SITE FS Discussion

PROPOSED ARAR LANGUAGE

- *USEPA position stated in the May 12, 2010 letter has been reflected in the revised PP*
- *That the NJDEP SRS calculated for the dermal/ingestion pathway are potential ARARs and identified as such*
- *That the selected remedies comply with these chemical specific ARARs through existing engineering controls and land use controls.*
- *That the NJDEP SRS calculated for the inhalation pathway are not ARARs but that the Army has used them as information to be considered TBCs.*

STATUS OF ARAR LANGUAGE

- Response to EPA comments submitted for both SHAW 25 site FS and ARCADIS 25 PP
- SHAW RTCs submitted to EPA and DEP 8/25 and approved by EPA 8/25
- ARCADIS RTCs also submitted to EPA and DEP but not yet approved

PROPOSED ARAR LANGUAGE

Compliance with ARARs Section

The promulgated NJ Site Remediation Standards were used at these sites to establish chemical-specific screening levels, inclusive of all criteria including those based on inhalation and lead standards. A May 12 2010 letter from USEPA indicated that the NJSRS for the dermal/ingestion pathways are potential ARARs, and the NJSRS for the inhalation pathway and lead standards are to-be-considered criteria. USEPA also indicated that in cases where the site risks were acceptable for the current and reasonably anticipated future use these ARARs and TBCs can be met through land use controls.

PROPOSED ARAR LANGUAGE

Alternative SL-1/SD-1 does not meet potential chemical-specific ARARs. All other alternatives meet potential ARARs through implementation of LUCs which both control exposure to residual contaminants, and changes in land-use that may lead to unacceptable risk in the future. SL-3/SD-3 and SL4/SD-4 evaluate additional actions designed to cover or remove soils.

ARAR LANGUAGE

- EPA noted in the approval of the Shaw 25 site FS that the PP should document why an active remedy is not practicable for a site. Not just consider an active remedy.
- Active remedies are not practicable to address risks that are currently within the generally acceptable range for the current and reasonable anticipated use
- There are no risks to address therefore meaningful evaluation and implementation of an active remedy is not possible.

ARAR LANGUAGE

- The only practicable remedy to meet the RAO of
 - Maintain a use consistent with the assumptions and results of the risk assessments which identified risk within the CERCLA generally accepted risk range for the current and reasonably anticipated future use (military/industrial) following NCP guidance.
- Is LUCs—with the following exceptions as agreed with EPA and DEP on 8 December 2009

PROPOSED REMEDIES

- LUCs at all sites. Additionally the following will be proposed at the following sites in response to EPA comments:
 - Focused lead hot-spot removals at Site 35 (NC Processing Area); and Site 199 (Former Pistol Range)
 - Focused soil removal of elevated RDX at Site 162 (Buildings 1070, 1071, 1071C)
 - Focused action to address elevated 2,4-DNT at Site 16 (GCL)
 - Focused action to address elevated mercury at Site 108 (Flare Island)
 - GW LTM for lead at Sites 32 (Storage Tanks); Site147 (Poach House); and Site150 (Propellant Plant).
 - GW LTM for TCE and radium at Site 50 (Still House) if the wells are still in-place

PROPOSED REMEDIES

- LUCs at all sites. Additionally the following will be proposed at the following sites in response to agreements made with DEP during the 8 December meeting:
 - Site 189 (Apple Tree Recreational Area)—Maintain grass cover
 - Site 150 (Propellant Plant)—LUCs will ensure berm created during site redevelopment covering lead soils will remain in place
 - Site 18 (Southern Teteryl Pits)—Maintain existing vegetative cover
 - Site 148 (NC Production Facility)—Maintain existing vegetative cover
 - Site 168 (Buildings 1400, 1402, 1403)— Maintain existing vegetative cover

PROPOSED PATH FORWARD

- The ARCADIS 25 Site FS approved by EPA on proposed to remain unchanged
- PP will summarize language and remedy changes since the FS in the up-front language and within the body of the PP

PROPOSED PATH FORWARD

- Future FS and Decision Documents for multi-sites will:
 - Reflect the agreed language
 - Be broken into 25 site Decision Documents
 - Will be submitted (FS) after meetings to review site data on a site-by-site basis
 - Decision Document language will be standardized and the 25 site RODs submitted concurrently to the extent possible

Multi-Site FS/DD

PICA 001 25 Site FS

Final PP October 2010

Final ROD May 2011

PICA 001 5-site FS

Final PP February 2011

Final ROD September 2011

PICA 011 45 (70) Site FS

Final PP February 2011

Final ROD August 2011

PICA 057 Non-Lakes FS

Final PP March 2011

Final ROD September 2011

LAKEFS Discussion

Lakes FS

Initially submitted with LUCs for all SW bodies
(Denmark, EOD Pond, Picatinny)

EPA commented the risks were acceptable for
unrestricted use at Denmark and EOD Pond
and NFA should be proposed

In final review of FS Picatinny Lake also has
acceptable risks for unrestricted use
(recreational) (but very high explosives in
sediment at Site 40)

Plan to submit revised FS

Lake Denmark NFA

EOD Pond NFA

Picatinny Lake focused sediment removal at
Site 40 with NFA following the action

EPA Priority

PICA 79 ROD

PICA 013 (Site 78) ROD/RD

PICA 72 (DRMO) RAR

Lakes FS Redline and RTC

PICA 001 25 Site PP

Multi-Site FS's as they come in

Quarterly/Semi Annual Data Reports

DEP Priority

Jim

PICA 72 (DRMO) RAR

PICA 001 25 Site PP

Lakes FS Redline and RTC

Multisite FS's as they come in

Joe

PICA 79 (Group 1)RD

PICA 013 (Site 78) ROD/RD

PICA 008 RD

Quarterly and Semi-Annual Reports