



Re: Picatinny 25 Sites FS (Shaw document)

Thursday, September 9, 2010 2:38 PM

From: "Joe Marchesani" <Joe.Marchesani@dep.state.nj.us>

To: "Jim Kealy" <Jim.Kealy@dep.state.nj.us>

Cc: "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>, Roach.Bill@epamail.epa.gov, ted.gabel@us.army.mil, michaelglaab@worldnet.att.net

Nice job Jim.

>>> <Roach.Bill@epamail.epa.gov> 9/9/2010 2:18 PM >>>

Ted, I shared this e-mail with my branch chief, Angela Carpenter, and she thought that Jim's suggestion regarding a worksheet describing how the maintenance of existing engineering controls at these sites is protective was an excellent idea. Bill

From: "Jim Kealy" <Jim.Kealy@dep.state.nj.us>

To: "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>, "Jim Kealy" <Jim.Kealy@dep.state.nj.us>, <ted.gabel@us.army.mil>

Cc: "Joe Marchesani" <Joe.Marchesani@dep.state.nj.us>, Bill

Roach/R2/USEPA/US@EPA

Date: 09/09/2010 02:04 PM

Subject: Re: Picatinny 25 Sites FS (Shaw document)

>>> Jim Kealy 09/08/10 12:31 PM >>>

Greg, Ted

I have reviewed the tracked changes document and final 25 site FS. The responses to previous BEERA comments is acceptable. The FS document is acceptable to BEERA. However, as noted in Ted's 9/7/10 letter, the remaining issue regarding the nature of the remedial action (engineering controls/ LUCs) for areas with exceedances of ARARs / NJ soil remediation standards (SRS) must be worked out prior to the submittal of the Proposed Plan.

To assist in getting this 'issue' resolved for this and other FS documents, I think it would be helpful if the Army would put together a worksheet / document to go along with the FS that lists all the sites with ARAR/ SRS exceedances that have proposed remedies of LUCs and/ or 'maintenance of existing engineering controls'. The worksheet should include a short summary presenting the contaminant name, number of exceedances, concentration range, average and spatial distribution of each ARAR exceedance. The document / worksheet should also include a short description of the nature of the existing engineering controls at these sites with a rationale explaining why the Army considers the proposed remedy protective for that specific area of concern. That document would provide DEP and EPA staff and management a useful reference tool for discussion / decision making regarding moving these sites forward.

What do you think?

Jim

