



DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, PICATINNY
PICATINNY ARSENAL, NEW JERSEY 07806-5000
September 3, 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 **Final 25 Sites Feasibility Study**: 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
Emergency Management Program
East State Street, Floor 5, P.O. Box 028
Trenton, New Jersey 08625-0028

Dear Sirs:

Enclosed for your records are copies of **Final 25 Sites Feasibility Study** developed by Shaw for the Army and Picatinny.

EPA had agreed to the tracked-changes document - based on the approved responses to comments (found in the jacket of this report) - per the attached 25 August email from Mr. Roach.

The document has been through a number of time-consuming policy changes since 2005 when the first draft was submitted and even though there may be a remaining issue per our meeting yesterday, I suggest it be handled within the Proposed Plan stage and not this Feasibility Study.

Sincerely,

Project Manager for
Environmental Restoration

Enclosure

Copies Furnished (PDF only):
NJDEP, Mr. Jim Kealy
RAB Co-chair, Mike Glaab

Attachment: 25 August email from Bill Roach

From: Roach.Bill@epamail.epa.gov [mailto:Roach.Bill@epamail.epa.gov]
Sent: Wednesday, August 25, 2010 4:03 PM
To: Gabel, Ted Mr CIV USA IMCOM
Cc: Greg Zalaskus; Jim Kealy; Joe Marchesani; michaelglaab@worldnet.att.net
Subject: Re: Tracked Changes of 25 Site FST (UNCLASSIFIED)

Ted, EPA finds the response to comments and the tracked changes to the FS to be acceptable. However, it should be noted that the proposed plan for these sites must document why an active remedy is not practicable for a particular site, not just consider an active remedy. Bill

From: "Gabel, Ted Mr CIV USA IMCOM" <ted.gabel@us.army.mil>
To: Bill Roach/R2/USEPA/US@EPA
Cc: "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>, "Jim Kealy" <Jim.Kealy@dep.state.nj.us>, "Joe Marchesani" <Joe.Marchesani@dep.state.nj.us>, <michaelglaab@worldnet.att.net>
Date: 08/25/2010 02:57 PM
Subject: Tracked Changes of 25 Site FST (UNCLASSIFIED)

Classification: **UNCLASSIFIED**

Caveats: NONE

Bill:

Attached are the tracked-changed Feasibility Study for the Shaw 25 Site FST (not the ARCADIS 25 Site Proposed Plan.) You had approved the responses to your comments in the email below.

Once you OK the tracked changes, we will get the hard copy to you for your records. At that point the next document will be a responsibility of ARCADIS's.

From: Roach.Bill@epamail.epa.gov [mailto:Roach.Bill@epamail.epa.gov]
Sent: Thursday, July 22, 2010 11:23 AM
To: Gabel, Ted Mr CIV USA IMCOM
Cc: Greg Zalaskus; Jim Kealy; Joe Marchesani; michaelglaab@worldnet.att.net
Subject: Re: Response to Comments (UNCLASSIFIED)

Ted, EPA finds the RTCs for the Shaw 25 Site FS to be satisfactory. Bill

From: "Gabel, Ted Mr CIV USA IMCOM" <ted.gabel@us.army.mil>
To: Bill Roach/R2/USEPA/US@EPA
Cc: "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>, "Jim Kealy" <Jim.Kealy@dep.state.nj.us>, "Joe Marchesani" <Joe.Marchesani@dep.state.nj.us>, <michaelglaab@worldnet.att.net>
Date: 07/22/2010 11:08 AM
Subject: Response to Comments (UNCLASSIFIED)

Classification: **UNCLASSIFIED**

Caveats: NONE

Bill:

Please see responses to responses to comments on the Shaw 25 Site FS (PICA 96). The Army team including both Shaw (Doug) and ARCADIS (Tim) and AEC (Fran) believe this complies with your recent email and one outstanding comment on the Lake FS plus the position stated in EPA's letter to the NJDEP on their standards as ARARs.

Basically it includes the following general positions so all the Picatinny sites can move forward:

1 - Screening of Soil Data. In the comment response we propose to continue the use of all of the NJDEP SRS criteria as Levels of Concern to be used in screening data. I think the USEPA should be amenable to this position as long as we don't call the NJDEP inhalation numbers ARAR at any point.

2 - Development of Site Cleanup Levels. In the comment responses we propose to not change the approach we have for the development of Site Cleanup Levels. In this approach we use all of the NJDEP SRS. However, in light of the USEPA comments we will make it clear that the NJDEP numbers based on dermal/ingestion are ARAR and the numbers based on inhalation are TBC.

3 - Compliance with Chemical-Specific ARARs. We will state in the compliance with ARARs section that the numbers based on dermal/ingestion are ARAR and that we comply with them through a combination of existing engineering controls and land use controls. This is only a wording change and does not change any of the proposed remedial alternatives.

Classification: **UNCLASSIFIED**

Caveats: NONE[attachment "RTCs - USEPA 25 Sites FS final rev 0.doc" deleted by Bill Roach/R2/USEPA/US]

Classification: **UNCLASSIFIED**

Caveats: NONE[attachment "25 Sites final FFS 081910.doc" deleted by Bill Roach/R2/USEPA/US] [attachment "RTCs - USEPA 25 Sites FS final rev 0.doc" deleted by Bill Roach/R2/USEPA/US] [attachment "NJ Soil Std.pdf" deleted by Bill Roach/R2/USEPA/US]