




600 Area Source and VI WP RTCs\_USEPANJDEP (2) (UNCLASSIFIED)

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600 Area Si

Classification: UNCLASSIFIED

Caveats: NONE

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**Response to USEPA and NJDEP Comments on the  
600 Area Work Plan for Vapor Intrusion and Source Area Investigation  
Picatinny, New Jersey**

**I. NJDEP, Jim Kealy, Technical Coordinator, BEERA – 10/26/2010**

**Comment 1.**

**Comment:** The layer of surface rock fill that had previously covered all of Site 12 has been removed. Therefore, NJDEP requires that soils be fully characterized at the site. The proposed sampling at Site 12 must include characterization of surface and subsurface soil conditions according to the NJ. Technical Requirements for Site Remediation (N.J.A.C. 7:26E). In addition to the proposed source area delineation, soil characterization is needed for direct contact exposure assessment, since the site has apparently not been previously characterized.

**Response:** The focus of the proposed source area investigation is the potential source in soil for the 600 Area groundwater plume. As part of the source area investigation, 10 of the proposed soil samples (collected from both surface and subsurface locations) will also be analyzed for TAL Metals, Baseline Explosives, and PAHs. Sample locations will be determined based on field observations (including PID readings, soil staining, or debris indicative of a potential contaminant source) from proposed test pits, where the location of the test pits will be determined from the results of the passive soil gas survey. The 600 Area FS, Proposed Plan, and Record of Decision will be completed based on the results of the VOC source area delineation. The remaining sampling results will be evaluated and if contamination is identified the Army will follow up with a separate Site Investigation. The SI will address the fill materials deposited at the site during the 1970s. It should be noted that the remainder of the Munitions Testing Area is slated to be investigated under the Military Munitions Response Program. All of the additional analytical parameters will be provided for use in the MMRP evaluation.

**II. USEPA, Bill Roach – 11/2/2010**

**Comment 1.**

**Comment:** It is recommended that two more gore sorbers be added to those proposed; one each between the columns extending northward.

**Response:** Agreed. Two additional proposed Gore Module sample locations have been added as recommended.

**Comment 2.**

**Comment:** It is requested that the results of the gore sorbers and the proposed trenching locations be submitted to EPA/NJDEP before follow-up sampling commences.

**Response:** Agreed. The text has been revised to state that the Gore Survey results and proposed trenches and/or test pits will be submitted to USEPA and NJDEP for review prior to commencing excavation for soil sampling.

III. USEPA, Urszula Filipowicz – 11/12/2010

**Comment 3.**

**Comment:** As stated in the document (page 3-4), sub-slab soil gas results will be compared to NJDEP Nonresidential Soil Gas Screening Levels and the USEPA Industrial Air Regional Screening Levels. The indoor air results will be compared to the NJDEP Indoor Air Screening Levels and USEPA Industrial Air Regional Screening Levels. The investigation focuses on a select number of VOCs, including TCE and its degradation products, therefore the chemical specific screening values should be listed/tabulated in the work plan.

**Response:** **Agreed. The requested table of TCE and its degradation products with applicable indoor air and soil gas screening levels has been added to the text (Table 3-2).**