




Response to Comments on ICM Report (UNCLASSIFIED)

Wednesday, December 1, 2010 10:23 AM

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

To: "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>

Cc: "Jim Pastorick" <>, "Jim Kealy" <Jim.Kealy@dep.state.nj.us>, Roach.Bill@epamail.epa.gov, subsurfacesolns@earthlink.net, michaelglaab@worldnet.att.net

 2 Files (64KB)



RtC for Jim



4.5\_inch\_roc

Classification: UNCLASSIFIED

Caveats: NONE

Greg:

Attached are Army=approved responses to your comments on the 'Former DRMO ICM Report'.

Once you accept them, we will provide a revised report incorporating the agreed-to changes.

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Classification: UNCLASSIFIED

Caveats: NONE

**Comments and Responses on the  
Draft Final Interim Remedial Action Report for U.S. Army Garrison Picatinny Arsenal, New Jersey  
Former DRMO Yard ICM Site at Picatinny Arsenal  
Picatinny Arsenal, Morris County, New Jersey  
September 2010**

**Commenter: Mr. Jim Pastorick  
Comments Dated: October 23, 2010**

Item No.	Report Reference	Comment	Response
1.	General	Adding line numbers to draft documents is recommended to assist reviewers in identifying the specific reference location in the document.	<i>Noted. We will consider this request and evaluate if it can be easily implemented.</i>
2.		Page 1, forth bullet: This text references the requirement for a 4-ft. cap on the ICM Area. Later, Section 3.3.9 notes that the requirement was reduced to a 2-ft. cap and that this was agreed to by EPA and NJDEP in an E-mail. Since the 4-ft. cap was a requirement of the Action Memorandum (AM), NJDEP recommends documenting this change in an addendum to the AM to ensure that this decision is clearly documented for inclusion in the final Record of Decision (ROD) for this site when the final ROD is developed.	<i>USEPA has approved this Draft Final Interim Remedial Action Report as written and has not requested additional documentation of this change. This Interim Remedial Report documents the change and this report can be referenced in the final ROD for this site.</i>
3.		<p>There is non-standard terminology used throughout the document. For example:</p> <ul style="list-style-type: none"> <li>• The terms “screening surveys” and “clearing of ICMs” are used in Section 3.2 and elsewhere when the more standard “instrument-assisted removal of surface MEC” is used in Section 3.3.3 and Appendix C.</li> <li>• There are numerous references to items that are “free on the surface” (see 3.3.5 and numerous instances in Appendix C). This term has not been seen in MEC-related reports and should be explained.</li> <li>• The references to “demolition procures” in the photo captions in Appendix B (see page 5 and 8) is not understood. Perhaps this should refer to “demolition procedures”.</li> </ul>	<p><i>Agreed the text in section 3.2 has been revised to the more standard “instrument assisted removal of surface MEC”</i></p> <p><i>The term “free on the surface” is specific to cultural debris (non MEC metal scrap). To limit subsurface disturbance, partially buried metallic scrap was not excavated and removed. Only cultural debris which was lying freely on the surface (i.e. not partially buried) was removed. The text in Section 3.3.5 has been revised to clarify this point.</i></p> <p><i>Agreed. This typo has been corrected.</i></p>

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4.	Section 3.3.4	<p>Section 3.3.4 describes thirteen explosive disposal events during which 192 ICMs were destroyed. The Daily Operations Reports in Appendix B of Appendix C to the main report do not contain documentation of finding these ICMs and the other ordnance items during the project. This may be because “attached sheets” referenced in Section 3 of some of the reports (see reports for 7/4/09 and 7/10/09) are not included. NJDEP recommends including the daily accounting for ordnance items found in the report.</p> <p>Other deficiencies in the subcontractor Daily Operations Reports are:</p> <ul style="list-style-type: none"> <li>• Page 1 of the report before 7/10/09 is missing.</li> <li>• The report for 7/17/09 says that four 4.5-in. rockets were found while Table 3-1 of the subcontractor's report says only one was found.</li> <li>• Also, please provide additional information on the 4.5-in. rocket. A quick search of Ordata doesn't show any U.S. 4.5-in rockets.</li> <li>• The note on the report for 7/17/09 refers to actions that occurred in the future on 7/19/09. These are daily reports and should contain only activities that occurred on the day of the report. Actions that took place on 7/19 should be documented on the report for that day.</li> </ul>	<p><i>Agreed. ARCADIS requested the summary sheets for 7/4/09 and 7/10/09 from USA Environmental and they have provided the requested information. These attachments have been added to the report.</i></p> <p><i>Regarding the other deficiencies noted:</i></p> <ul style="list-style-type: none"> <li>• <i>Page 1 of the 7/10/09 is included. See top of page labeled “Page 1 of 5 Pages”. Perhaps the confusion stems from the bottom of the page labeled “Page 2 of 5 Pages” which is a typo. Further review found that Page 1 of the 7/06/10 report is actually missing. It has been located and will be included.</i></li> <li>• <i>Table 3-1 will be updated.</i></li> <li>• <i>Additional information on the 4.5 in rocket has been provided by USA Environmental has been added to the report. The information on the developmental 4.5 in rocket is also included with this response to comment form.</i></li> <li>• <i>Agreed demolition of these items was already documented on the 7/19/09 Daily Report, therefore annotation of this report was not required. However, at the Army's request the 07/17/09 Daily report was annotated to document the final disposition of the two unidentified items. No revision required.</i></li> </ul>

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5.	Section 9	Section 9 refers to a program to measure the loudness and blast pressure from the detonations. However, this program and the results are not mentioned in the report. If the program is referenced in "lessons learned" it should first be described in the report and the data from the sound and blast monitoring program should be included in the report.	<i>Agreed. Photos of the instruments used are already included in Appendix B and discussed in Section 2.5 of Appendix C. Text describing the program will also be added to Section 3.3.4 of the main report.</i>
6.	Appendix C	<p>In Appendix C:</p> <ul style="list-style-type: none"> <li>• Section 2.2 says that work was conducted Monday through Friday. This conflicts with Section 2.3 which says work was also conducted on weekends and holidays.</li> <li>• Were any explosively loaded MEC found during the project? Section 3.2 refers to "live/explosive filled items" while Table 3-1 implies that all ordnance found was inert (see the heading on the first column of this table). Clearly identifying the number and type of explosively filled MEC in the main report and the subcontractor's report is recommended.</li> <li>• There are numerous abbreviations in Table 3-1 that are not defined or included in the list of abbreviations in the beginning of Appendix C including BLU, BDU, M, and PD. All abbreviations should be defined.</li> <li>• It is difficult to see the details noted in the color photos reproduced as black and white in Appendix A. Communication of the details in the photos would be improved if they were reproduced in their original color.</li> <li>• The "Explosives Usage Record" for 7/6/09, "3rd Shot" is not signed and dated.</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Disagree. Section 2.2 states "...work days from Friday through Monday". No revision required.</i></li> <li>• <i>No live/explosive filled items were found. The sentence in questions is clarifying that some items were initially designated by nomenclature representing the status live/explosive filled (i.e. BLU-3), however all items were inert. Therefore, where possible the training versions nomenclature has been provided (i.e. BDU 28/B).</i></li> <li>• <i>Agreed. All abbreviations have been defined.</i></li> <li>• <i>Agreed. Final hard copies to NJDEP will be provided in full color.</i></li> <li>• <i>Agreed. USA Environmental has provided the signed copy to ARCADIS. It has been added to the report.</i></li> </ul>