



811 Duke St.  
Alexandria, VA 22314  
Phone: (703) 548-5300  
E-mail: jim@uxopro.com  
E-mail: jim@uxopro.com

## Memorandum

**From:** Jim Pastorick  
**To:** Greg Zalaskus  
**Date:** October 23, 2010  
**Subject:** Review of the *Draft Final Interim Remedial Action Report for the Former DRMO Yard ICM Site at Picatinny Arsenal*, Dated September 2010

Greg:

I reviewed the subject document. My comments are attached.

Please contact me if you have comments or questions on this document review.

Thank you,

A handwritten signature in black ink that reads 'Jim Pastorick'.

NJDEP Review of the *Draft Final Interim Remedial Action Report*  
for the Former DRMO Yard ICM Site at Picatinny Arsenal,  
Dated September 2010

1. Adding line numbers to draft documents is recommended to assist reviewers in identifying the specific reference location in the document.
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.
3. There is non-standard terminology used throughout the document. For example:
  - 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.
  - 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.
  - 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”.
4. 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.

Other deficiencies in the subcontractor Daily Operations Reports are:

- Page 1 of the report before 7/10/09 is missing.
- 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.
- 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.
- 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.

5. 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.
6. In Appendix C:
  - 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.
  - 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.
  - 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.
  - 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.
  - The “Explosives Usage Record” for 7/6/09, “3<sup>rd</sup> Shot” is not signed and dated.