



**Picatinny - Group 1 Sites Remedial Action Work Plan (UNCLASSIFIED)**

Wednesday, August 25, 2010 4:37 PM

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

**To:** Roach.Bill@epamail.epa.gov

**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>, "Crone, Thomas" <Thomas.Crone@arcadis-us.com>, michaelglaab@worldnet.att.net

1 File (26KB)



PICA 079 D

Classification: **UNCLASSIFIED**

Caveats: NONE

Bill:

Attached for your review and approval are the responses to comments on PICA 079 Remedial Design that you sent earlier today. Our response are compliant with your requests.

Although, we are still awaiting any comments (or approval) from NJDEP and we do have an EPA-signed Record of Decision, we (ARCADIS) will be going forward with the action as defined in the RD - most likely starting early next week.

I will be out tomorrow through next Wednesday, if you have any technical questions or require clarifications on this response to comments or the workplan in generally, please email Tom Crone (email address above) and copy me\* before my return. This subject is already on the agenda for next week meeting on Thursday.

- This includes my home email at [REDACTED]

Ted Gabel  
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**From:** Gabel, Ted Mr CIV USA IMCOM [mailto:ted.gabel@us.army.mil]

**Sent:** Wednesday, August 25, 2010 3:27 PM

**To:** Crone, Thomas

**Cc:** Coulters, Francis J LTC NG USA; Flaherty, Nancy E NAB02; Schiffmacher, Emily NAB; Llewellyn, Tim

**Subject:** RE: Picatinny - Group 1 Sites Remedial Action Work Plan (UNCLASSIFIED)

Classification: **UNCLASSIFIED**

Caveats: NONE

Tom/Tim:

As discussed, if you cannot get the RtCs in today to me, please send directly to Bill (copy Greg, Jim, Joe and Mike & me).

Thanks.

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**From:** Crone, Thomas [mailto:Thomas.Crone@arcadis-us.com]  
**Sent:** Wednesday, August 25, 2010 11:31 AM  
**To:** Gabel, Ted Mr CIV USA IMCOM  
**Cc:** Coulters, Francis J LTC NG USA; Flaherty, Nancy E NAB02; Schiffmacher, Emily NAB; Llewellyn, Tim  
**Subject:** RE: Picatinny - Group 1 Sites Remedial Action Work Plan (UNCLASSIFIED)

Thanks Ted.

We'll start preparing responses right away. In your absence tomorrow, may I send directly to EPA (assuming I have Fran's approval of our responses)?

Tom

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**From:** Gabel, Ted Mr CIV USA IMCOM [mailto:ted.gabel@us.army.mil]  
**Sent:** Wednesday, August 25, 2010 11:23 AM  
**To:** Crone, Thomas; Llewellyn, Tim  
**Cc:** Coulters, Francis J LTC NG USA; Flaherty, Nancy E NAB02; Schiffmacher, Emily NAB  
**Subject:** FW: Picatinny - Group 1 Sites Remedial Action Work Plan (UNCLASSIFIED)

Classification: **UNCLASSIFIED**

Caveats: NONE

Not much. First time I heard of EPA EDDs.

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**From:** Roach.Bill@epamail.epa.gov [mailto:Roach.Bill@epamail.epa.gov]  
**Sent:** Wednesday, August 25, 2010 11:19 AM  
**To:** Gabel, Ted Mr CIV USA IMCOM  
**Cc:** michaelglaab@worldnet.att.net; gzalasku@dep.state.nj.us  
**Subject:** Picatinny - Group 1 Sites Remedial Action Work Plan

Ted, attached are EPA comments on the Group 1 Remedial Design. Hard copy to follow. Bill

Classification: **UNCLASSIFIED**  
Caveats: NONE

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Classification: **UNCLASSIFIED**  
Caveats: NONE  
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Caveats: NONE

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**Comments and Responses on the Draft Final Remedial Action Work Plan  
for U.S. Army Garrison Picatinny Arsenal, New Jersey  
Group 1 Sites (PICA 079)  
Picatinny Arsenal, Morris County, New Jersey  
August 2010**

**Commenter: Bill Roach, United States Environmental Protection Agency  
Comments Dated: August 25, 2010**

Item No.	Report Reference	Comment	Response
1.	Section 4.1, Media and Constituents of Concern, second paragraph, page 8	In the third sentence change "IN" to "in".	<i>Agreed. Update has been made as requested.</i>
2.	Section 4.1, Media and Constituents of Concern, second paragraph, page 8	In the fourth sentence revise the ending clause of the sentence to "...however, SCLs were not established for these media."	<i>Agreed. Update has been made as requested.</i>
3.	Section 5.2.2 and Section 5.2.4	Section 5.2.2 and Section 5.2.4 refer to a staging/storage area location shown of Figure 2. However, Figure 2 does not appear to show such an area.	<i>Disagree. The staging/storage area is depicted on Figure 2 in the lower southwest portion of the site. It is a hatched box with arrows depicting the access paths from the staging/storage area to the excavations.</i>
4.	Section 7.1.2, Construction, page 31	The first bullet states that: "Common fill shall be compacted with the bucket of the backhoe until there is no visible movement of compacted soil." This is not an industry standard for compacting soil. It is understood that this soil will not serve as a foundation for a structure, but it merits more than being tapped by a backhoe bucket (ie., a vibrating compactor that can be operated by one man).	<i>Agreed. The text will be revised to state Common Fill shall be compacted with a vibrating compactor prior to placing topsoil.</i>
5.	Figure 6, Land Use Control Plan	It is requested that the red lines surrounding the Group 1 Sites be identified in the legend as representing the respective LUC boundaries of the Group 1 Sites.	<i>Agreed. Update has been made as requested.</i>
Hydro-Geological Comments			

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**Commenter: Bill Roach, United States Environmental Protection Agency  
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Item No.	Report Reference	Comment	Response
1.	General	Arcadis's work at Picatinny presently encompasses 47 PICA sites. An overall electronic base map of the entire facility indicating all of the sites, site features, and monitoring locations (primarily the monitoring wells) is needed, and should be updated as new submittals to the Region 2 EDD are made. Please note that the small size figures are basically illegible. While I appreciate their inclusion, this also includes the figures included in Appendix F.	<p><i>Noted. ARCADIS is currently implementing a Site-wide well inspection, abandonment, and repair program for the Army. This program is being implemented in a phased approach as sites are closed out under CERLCA and enter LTM. Well Inspection, Abandonment, and Repair Work Plans have been submitted to EPA previously.</i></p> <p><i>The Army or Arcadis was not aware of the Region 2 EDD requirement and this topic will be discussed at the September 2, 2010 meeting.</i></p>
2.	General	The response action was selected to "address elevated levels of explosives" and other constituents. (page 1) Please note that page 2 states that the response action selected does not address munitions. I am assuming that some munitions may be explosive. I suggest that an alternative means of defining the response action-- "to address elevated levels of soil and groundwater impacted by explosives" be considered.	<p><i>Agreed, with exception. The referenced sentence on Page 1 concludes with "found in the soil and groundwater at the Group 1 Sites (PICA 079)" and therefore already reflects the nature of the explosives (in soil and groundwater, rather than actual munitions). Any other instances of the phrase "address elevated levels of explosives" will be revised to "address elevated levels of explosives found in the soil and groundwater"</i></p>
3.	Page 5	Unless there is data to otherwise indicate, a phrase that the unconsolidated and shallow bedrock aquifers are directly connected and unconfined should be included in the text on page 5.	<p><i>Agreed. Update has been made as requested.</i></p>
4.	Page 7	The RAOs for the Group 1 sites are summarized. While the introductory paragraph references "ecological receptors and the environment in addition to continued protection of human health as the goals, the bulleted descriptions only refer to human exposure as RAO - ROD items. Please fill me in on whether "ecological receptors" were eliminated as a specific RAO.	<p><i>Agreed. Previously prepared CERCLA documents evaluated ecological risk and derived cleanup goals for ecological risk drivers. These cleanup goals have been factored into the SCLs. Therefore achievement of the fourth bullet includes protection of ecological receptors.</i></p>

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**Commenter: Bill Roach, United States Environmental Protection Agency  
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Item No.	Report Reference	Comment	Response
5.	Page 35	Section 4.22, page 9 estimated that it could take up to 11 years to achieve groundwater standards., but the MNA program has been designed to “evaluate long-term behavior of the plume”. I assume the current plume characterization has already been evaluated. The MNA program is designed to assess whether this evaluation and predicted dissolved plume degradation is correct. We are evaluating the effectiveness of MNA.	<i>Agreed. This text will be revised state “...evaluate long-term effectiveness of MNA”</i>
6.	Page 13	Paragraph 3 mentions that “super silt fence” will be used to control sediment migration. Can you supply some information as to what this material is? I did not include a detailed review of the Technical Specifications (Appendix D) submitted as part of the Work Plan.	<i>Agreed. Super silt fence is included in the Technical Specifications. It is standard engineering control that consists of regular silt fence reinforced with chain link fence. Generally super silt fence is required based on the angle and run of slope or used in difficult applications (such as adjacent to Picatinny Lake) where additional strength and long term effectiveness is needed.</i>
7.	General	The report states that an EDD for data sets associated with the sampling are being submitted to NJDEP (refer to page 18). Please note that EPA Region 2 has an EDD requirement and the EPA Region 2 EDD needs to also be submitted. Please advise what office and who the contact has been at NJDEP for their submittals. We will need to follow-up and coordinate this with NJDEP and the Army.	<i>Noted. The Army or Arcadis was not aware of the Region 2 EDD requirement and this topic will be discussed at the September 2, 2010 meeting.</i>
8.	General	There is some discussion on “background samples”, but this work plan does not include a reference or more definitive database and discussion of all of the samples used at Picatinny for determination of background levels. I would like to discuss this at a later point.	<i>Noted. However a search of the RAWP did not return any results for the word ‘background’.</i>
9.	General	A comprehensive monitoring well assessment should be conducted at the Picatinny facility. We need to ensure that all locations for each specific site are on the same locational database and plane.	<i>Agreed. This is being conducted under a Site-Wide program at Picatinny in a phased approach.</i>

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<b>Item No.</b>	<b>Report Reference</b>	<b>Comment</b>	<b>Response</b>
10.	Appendix I	The Schedule, Appendix I, states that the CERCLA 5 Year Review is scheduled to start June 1, 2011. An annual site inspection is also scheduled for December 7, 2010. That may comply with the requirements for a site visit in association with the 5 Year Review. However, I may be interested in visiting the site to observe the deployment or retrieval of hydrasleeves in September 2010. Please advise.	<i>Agreed. The deployment and retrieval of hydrasleeves is not currently scheduled but will be conducted sometime in September. Upon finalizing the schedule, USEPA will be notified and you may coordinate a site visit with the Army (Mr. Ted Gabel 973-724-6748) and Arcadis (Mr. Tom Crone 410 -923-7766).</i>