




Picatinny - Group 1 Sites Remedial Action Work Plan

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From: "Roach.Bill@epamail.epa.gov" <Roach.Bill@epamail.epa.gov>

To: ted.gabel@us.army.mil

Cc: michaelglaab@worldnet.att.net, gzalasku@dep.state.nj.us

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EPA Comme

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

EPA Comments on the
Group 1 Sites Remedial Action Work Plan, August 2010
Picatinny Arsenal, NJ
August 25, 2010

Specific Comments

1. Section 4.1, Media and Constituents of Concern, second paragraph, page 8 – In the third sentence change “IN” to “in”.
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.”
3. 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.
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).
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.

Hydro-geological Comments

1. 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.
2. 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.
3. 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.

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.

5. 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. (page 35)

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.

7. 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.

8. 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.

9. 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.

10. 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.