



RE: Picatinny - Group 1 Sites Remedial Action Work Plan

Friday, August 27, 2010 5:35 PM

From: "Jim Kealy" <Jim.Kealy@dep.state.nj.us>

To: Thomas.Crone@arcadis-us.com, "Greg Zalaskus" <Greg.Zalaskus@dep.state.nj.us>

Cc: Tim.Llewellyn@arcadis-us.com, "Joe Marchesani" <Joe.Marchesani@dep.state.nj.us>, Roach.Bill@epamail.epa.gov, tedgabel07@msn.com, francis.coulters@us.army.mil, ted.gabel@us.army.mil, Emily.N.Schiffmacher@usace.army.mil, Nancy.E.Flaherty@usace.army.mil, michaelglaab@worldnet.att.net

Greg, Ted, Tom etc,

Thanks for the quick response Tom. I have reviewed Arcadis response to NJDEP comments on the Group 1 sites Remedial Action Workplan. The responses are acceptable. With these changes the RAW is acceptable to NJDEP.

Jim

>>> "Crone, Thomas" <Thomas.Crone@arcadis-us.com> 08/27/10 5:02 PM >>>

Jim,

Thank you for the comments. I attach our responses. I must point out that in Ted's absence these responses have not been reviewed and approved by the Army. However, given the nature of the comments and our agreement to conduct additional sampling, I see no harm in sending these to you now (especially since we are mobilizing on Monday).

We can discuss in detail at our meeting next week. Have a great weekend!

Tom

-----Original Message-----

From: Jim Kealy [mailto:Jim.Kealy@dep.state.nj.us]

Sent: Thursday, August 26, 2010 12:42 PM

To: Greg Zalaskus; ted.gabel@us.army.mil

Cc: Crone, Thomas; Joe Marchesani; Roach.Bill@epamail.epa.gov; tedgabel07@msn.com; michaelglaab@worldnet.att.net

Subject: Re: Picatinny - Group 1 Sites Remedial Action Work Plan

Hi Greg,

See attached comments regarding the Remedial Action Workplan for Group 1 sites. Let me know if you have any questions or would like to discuss.

Jim

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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: Jim Kealy, Technical Coordinator, BEERA
Comments Dated: August 25, 2010**

Item No.	Report Reference	Comment	Response
1.	General Comment	The pre-excavation sampling conducted by Arcadis may not adequately represent current conditions at the site and future post excavation conditions. The pre-excavation samples should have been collected from below the proposed ROD approved excavation areas. Instead Arcadis has attempted to re-delineate the site, by going back to the areas sampled 13 years ago and attempted to resample those hotspots. Based on the new data, Arcadis has redefined the extent of the ROD approved excavations. The 4 redefined excavation areas are all proposed to extend to 2 feet depth. Yet all pre-excavation samples are 0-1' samples. Therefore, the post excavation soil depth (2') has not been properly characterized. To resolve this issue, NJDEP requires post excavation bottom sampling in areas A, B, C, and D as required per the tech regs.	<i>Agreed. ARCADIS will collect samples from the excavation bottom in Areas A, B, C, and D from 2 to 2.5 feet below ground surface (bgs).</i>
2.	General Comment	Arcadis has made the assumption that the contamination detected in 1996 has not migrated in vertically in the 13 years since the RI sampling. Most of the 2009 pre-excavation samples were collected from the same depth as the 1996 samples. Unless adequate rationale is provided, NJDEP requires that appropriate horizontal and vertical delineation is required before eliminating a previously delineated AA from the remedial action. To resolve this issue, NJDEP requires at least one deeper sample (2-2.5') from each former AA that was removed from the remedial action to confirm that contamination has not migrated vertically.	<i>Agreed. ARCADIS will collect one additional sample from an interval of 2 to 2.5 feet bgs from each former AA previously removed from the remedial action.</i>

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for U.S. Army Garrison Picatinny Arsenal, New Jersey
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**Commenter: Jim Kealy, Technical Coordinator, BEERA
Comments Dated: August 25, 2010**

Item No.	Report Reference	Comment	Response
3.	General Comment	There is insufficient data presented to separate Excavation areas C and D into 2 separate areas as proposed. An additional surface and subsurface sample is required between these 2 areas.	<p><i>Agreed. Two subsurface samples will be collected from beneath the covered walkway which separates Excavation Areas C and D. If COCs exceed COCs, the walkway will be designated as an engineered control in Picatinny's GIS.</i></p> <p><i>The work plan currently includes a confirmation sample collected from the northern sidewall of Excavation C, I-CSS004 and a confirmation sample collected from the eastern sidewall of Excavation D, I-CSS006, both reported COC concentrations below the respective SCLs.</i></p>
4.	General Comment	Additional post excavation samples are required to delineate the area west of 1-GSS008, including the area beneath the covered walkway.	<p><i>Agreed. Additional sampling west of sample location 1-GSS008 will be conducted to delineate the western extent of the excavation, including the collection of a sample from beneath the walkway. In addition, a sample will be collected at 1-GSS008 from an interval of 3 to 4 feet bgs.</i></p>