

**Comments and Responses on the Draft Final Record of Decision  
for U.S. Army Garrison Picatinny Arsenal, New Jersey  
Group 1 Sites (PICA 079)  
Picatinny Arsenal, Morris County, New Jersey  
March 2010**

**Commenter: William Roach, Remedial Project Manager, EPA  
Comments Dated: June 24, 2010**

Item No.	Report Reference	Comment	Response
1.	General Comment	Add a figure showing the boundaries of the LUCs.	<p><i>Agreed. A figure depicting the LUC boundaries has been added as Figure 12. In addition, the following text has been added after the second sentence of the first paragraph within Section 2.14.3:</i></p> <p><i>“The area of LUC applicability for Group 1 Sites is depicted on Figure 12.”</i></p>
2.	General Comment	The Group 1 Sites ROD addresses contaminated soil and groundwater. However, Table 5, Human Health Risk Assessment Results, and Section 2.8.1.3, Risk Characterization do not list or discuss risk resulting from exposure to contaminated groundwater. It is requested that risk associated with this exposure pathway be fully discussed and added to the relevant table.	<p><i>Agree, with exception. Risk associated with groundwater exposure is included in Section 2.2.8.1, where applicable. Cumulative risk, including future industrial research worker (ingestion) and construction/excavation worker (dermal absorption) exposure is discussed in the text and Table 5.</i></p> <p><i>As documented in the FS, ingestion of groundwater was evaluated for the future industrial research worker for only Site 40 and 157, as these two sites are above unconsolidated aquifers with sufficient well yields. Risk associated with this exposure pathway has been incorporated into the Excess Lifetime Cancer Risk on Table 5 and the following sentences have been added the text:</i></p> <p><i>Inserted as fourth sentence for Site 40: “Exposure to TNT in groundwater results in a cancer risk of <math>4.6 \times 10^{-5}</math>.”</i></p> <p><i>Inserted as fourth sentence for Site 157: “Exposure to RDX in groundwater results in a cancer risk of <math>1.9 \times 10^{-5}</math>.”</i></p>

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3.	General Comment	The selected remedy for contamination in soil at Site 40 includes the removal and off-site disposal of explosives and the implementation of land use controls for arsenic, PCBs, PAHs and residual explosives. However, it is not indicated in the ROD that risk levels will be acceptable after explosive-contaminated soils are removed from the site. Therefore, it is requested that language be added to the ROD indicating that risk levels due to exposure to soils will be acceptable at Site 40 following the implementation of the remedy.	<i>Agreed. Similar to the resolution of USEPA Comment #2 on the Proposed Plan, the following text has been inserted added to the at the end of Section 2.14.2:</i>  <i>“Upon the completion of the Selected Response Actions the cumulative cancer risk at each Group 1 site will be within, or below, the generally acceptable risk range of <math>1 \times 10^{-4}</math> to <math>1 \times 10^{-6}</math>.”</i>
4.	Section 1.5, Statutory Determinations, third paragraph, page 1-2	Insert “the” between “and” and “NCP”.	<i>The third paragraph of Section 1.5 has been updated as requested.</i>
5.	Section 1.6, Data Certification Checklist, page 1-2	The page number for Baseline risk represented by the contaminants of concern (COCs) should be page number 2-5.	<i>Agreed. The referenced page number has been updated as requested.</i>
6.	Section 1.7, Authorizing Signature, page 1-3	Change “Emergency and Response Division” to “Emergency and Remedial Response Division”.	<i>“Emergency and Response Division” has been updated to “Emergency and Remedial Response Division” as requested.</i>
7.	Section 2.1, Site Name, Location, and Description, third paragraph, age 2-1	In the second sentence, it is apparent that “Area I” should be replaced with “Group 1”.	<i>Agreed. “Area I” has been replaced with “Group 1”.</i>

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8.	Section 2.4, Scope and Role of Response Action, second paragraph, page 2-3	In the second sentence place "explosives in" before "groundwater"	<i>Agreed. The second sentence of the second paragraph within Section 2.4 has been updated as requested.</i>
9.	Section 2.4, Scope and Role of the Response Action, fifth paragraph, page 2-3	Revise the first sentence as follows: "The RA selected for explosives in groundwater at Group 1 Sites...."	<i>Agreed. The first sentence of the fifth paragraph within Section 2.4 has been updated as requested.</i>
10.	Section 2.4, Scope and Role of Response Action, sixth paragraph, page 2-3	Revise the paragraph as follows: "Land use controls (LUCs) for soil and groundwater will be implemented to control current and future activities at Group 1 Sites that could result in unacceptable risk to human health." It should be noted that land use controls include institutional controls and engineering controls.	<i>Agreed. Comment noted.  The sixth paragraph of Section 2.4 has been updated.</i>
11.	Section 2.4, Scope and Role of Response Action, seventh paragraph, page 2-3	In the last sentence in the paragraph replace "beneficial use" with "unrestricted use".	<i>Agreed. The last sentence of the seventh paragraph within Section 2.4 has been updated as requested.</i>
12.	Section 2.6.1, Physical Characteristics, Size, Topography, and Surface Water Hydrology, first paragraph, page 2-3	In the second sentence, it is apparent that "Area I" should be replaced with "Group 1". It should be noted that according to the Lakes FS, Picatinny Lake is 108 acres in area.	<i>Agreed. "Area I" has been replaced with "Group 1" and the reference to Picatinny Lake has been removed.</i>

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13.	Section 2.6.2, Summary and Findings of Site Investigations, Extent of Ground Water Contamination, page 2-5	To be consistent with the text, "Ground Water" in the section title should be "Groundwater".	<i>Agreed. The referenced section title within Section 2.6.2 has been updated as requested.</i>
14.	Section 2.6.2, Summary and Findings of Site Investigations, Extent of Ground Water Contamination, first paragraph, page 2-5	In the last sentence of the paragraph replace "effected" with "affected".	<i>Agreed. The last sentence of the first paragraph within Section 2.6.2 has been updated as requested.</i>
15.	Section 2.7, Current and Potential Future Land Use, second paragraph, page 2-5	Revise the second to last sentence of the paragraph as follows: "The WRA functions as an institutional control...."	<i>The second to last sentence of the second paragraph within Section 2.7 has been updated as requested.</i>

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16.	Section 2.8.1, page 2-6	The second sentence states: "Potential risk associated with exposure to chemicals in soil, sediment, groundwater and surface water were quantified for current and future outdoor maintenance workers, current and future industrial/research workers, and future construction/excavation workers". Site Worker along with an Onsite Youth Visitor are two additional receptors which were evaluated and should be included in the text.	<p><i>Agreed. Section 2.8.1 has been updated to read as follows:</i></p> <p><i>"A human health risk assessment was conducted by IT Corporation, Inc. for the Group 1 Sites (PICA 079) as part of the Phase II RI (IT, 2002). The Phase II Sites went through an initial multi-phased risk assessment process that consisted of a three-step approach in order to streamline the risk assessment process. The first step of the process was the Screening-Level HHRA which implemented a generalized screening approach to identify sites with existing chemical concentrations exceeding their respective screening levels. Those sites retained during the Screening-Level HHRA moved on to the second step of the process and were evaluated during the default risk assessment. Any sites identified during the default risk assessment as being associated with unacceptable risks were then carried through to the third step of the risk assessment process, a site-specific multi-pathway risk assessment. Potential risks associated with exposure to chemicals in soil, groundwater, sediment, and surface water were quantified for current and future outdoor maintenance workers, current and future industrial/research workers, current and future site workers, and future construction/excavation workers.</i></p>

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16. cont.			<p><i>On-site visitors were not evaluated as a receptor during the site-specific risk assessments because it was assumed their exposures would be lower than those of site workers who were being evaluated. However, a supplemental risk assessment (IT, 2001b) was later performed to address concerns related to an on-site youth visitor coming in direct contact with impacted surface water and sediment. In addition, a second supplemental risk assessment was conducted to evaluate risks associated with exposure to chemicals via ingestion of fish caught in water bodies near the Group 1 Sites. The results of the supplemental fish assessment are included as part of the Picatinny Lake (PICA 057) CERCLA Documents.”</i></p> <p><i>The appropriate references have been added to Section 4.</i></p>
17.	Section 2.8.1.2, page 2-6 – 2-7	This section should be edited to include the Site Worker and an Onsite Youth Visitor as receptor populations for whom estimated risk and hazards were calculated.	<p><i>Agreed. “Site workers” was added to the current exposed populations list and “onsite youth visitors” was added to the current and future exposed populations list.</i></p>

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18.	Section 2.8.1.3, Risk Characterization, page 2-7 – 2-9	<p>This section has several inconsistencies when compared to Table 5. These include:</p> <p><u>Site 40:</u> "The cumulative cancer risk for the future industrial/research worker was <math>4 \times 10^{-4}</math> which is greater than the USEPA cancer risk range." Table 5 data shows that the cancer risk was estimated at <math>3 \times 10^{-4}</math></p> <p><u>Site 93:</u> "The non-cancer hazard for a construction worker was calculated to be greater than the hazard threshold of 1 (HI=2)." Table 5 states the HI=6. Additionally, as shown in Table 5, the HI for an onsite youth visitor is 3. This should be mentioned/discussed in the ROD text since it is above 1 and hence in the unacceptable risk range.</p> <p><u>Site 156:</u> "Cumulative cancer risk associated with the exposure of a current and future industrial/research worker exposure to soil at Site 156 was found to be <math>2 \times 10^{-4}</math>. The receptor "Industrial research worker" is not found on Table 5, however there is a Site worker listed. The reference to the receptor should be the same in both places. This also applies later in the paragraph when the non-cancer effect is discussed and again in the following paragraph when dermal absorption of arsenic is discussed. Changing the language in the ROD to be consistent with Table 5 would serve to diminish any confusion.</p>	<p><i>Agreed. Section 2.8.1.3 has been updated to be consistent with Table 5.</i></p> <p><i>The cumulative cancer risk for the future industrial/research worker at Site 40 was updated to <math>3 \times 10^{-4}</math>.</i></p> <p><i>The HI for a future construction/excavation worker at Site 93 was updated to 6. In addition, the following text was added at the end of the first paragraph for Site 93 to discuss the onsite youth visitor HI of 3:</i></p> <p><i>"The non-cancer hazard for an onsite youth visitor was calculated to be greater than the hazard threshold of 1 (HI=3). The onsite youth visitor HI is associated with sediment samples collected from two sumps, one of which has been removed and the other of which is located beneath a metal cover preventing contact to sediments; thus, the risk of actual exposure is less than that assumed for the HHRA."</i></p> <p><i>The risk characterization discussion for Site 156 was updated to reference "site workers" as a receptor as opposed to "industrial/research workers".</i></p>

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19.	Section 2.8.2.1, Summary of Findings for Soil and Terrestrial Food Chain Exposures, first paragraph, page 2-9	It is stated that "...surface soils at Sites 40 and 157 were toxic and likely to pose a risk to terrestrial plants and soil invertebrates." Additionally, it is noted that the Feasibility Study identified ecological risk drivers and derived ecological cleanup goals for surface soil through a weight of evidence approach. However, the Remedial Action Objectives (RAOs) provided in the Record of Decision do not address the protection of ecological receptors. Therefore, it may be appropriate to include an RAO which prevents ecological exposure to contaminated soil that would cause unacceptable risk.	<i>Agreed, with exception. The commenter is correct in that the FS identifies ecological clean-up goals (Table 5-3). These clean-up goals are incorporated into the Final Site Cleanup Levels (SCLs) presented in Table 7 of the ROD, where applicable. For some COCs, the permissible exposure limit (PEL) was undefined or determined unreliable as it is less than the literature toxicity reference value (TRV) or level of concern (LOC). In these cases the SCL was set above the ecological risk based level. Therefore, as the SCLs were established based on a variety of factors (human health, ecological risk, state criteria for direct contact, federal MCLs) it is not recommended that a RAO be added solely for ecological risk. The selected RA, which meets the current RAOs, includes excavation of explosive contaminated soils thereby eliminating ecological risk posed by 7 of the 9 eco-COCs identified in the FS. The other two eco-COCs (barium and copper) identified in the FS do not exist at the site above the SCLs. No revision required.</i>
20.	Section 2.10.1.2, Response Action S1-2: Excavation and On-Site Treatment by Composting, Implementation and Maintenance of LUCs, page 2-12	Revise the first sentence as follows: "Response Action S1-2 would be achieved in conjunction with the implementation and maintenance of LUCs, which are administrative and engineering measures put in place to maintain the current land use."	<i>Agreed. The first sentence of the referenced section has been revised as requested.</i>



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21.	Section 2.10.4.2, Response Action GW-2: Implementation of Institutional Controls and Monitored Natural Attenuation, Land Use Controls, page 2-16	Revise the third sentence to state: "These LUC objectives will be met until such a time that contaminant levels are sufficiently reduced to allow for unrestricted use of groundwater."	<i>Agreed. The third sentence of the referenced section has been revised as requested.</i>
22.	Section 2.10.4.2, Response Action GW-2: Implementation of Institutional Controls and Monitored Natural Attenuation, Surface Water/Sediment Monitoring, page 2-17	The second sentence refers to screening criteria for surface water and sediment. It appears that the last part of the sentence should be rewritten as follows: "...and screened against the NJSWQC for surface water and the lower of the following for sediment: ISQW, ....".	<i>Agreed. The second sentence of the referenced section has been updated as requested.</i>

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23.	Section 2.10.4.7, Response Action GW-7: Nano-Scale ZVI Injection, MNA, and Implementation of ICs, second paragraph, page 2-20	The third sentence refers to a “noble metal catalyst”. It is requested that an example of a noble metal catalyst be added as in “a noble metal catalyst such as palladium....”.	<p><i>The third sentence of the referenced section has been updated to read as follows:</i></p> <p><i>“Bimetallic nano-scale particles couple a noble metal catalyst such as palladium, with the reactant ZVI to further increase the reactivity.”</i></p>
24.	Section 2.10.4.8, Response Action GW-8: Enhanced Anaerobic Bioremediation by Injection of Microbial Growth Substrate (Hydrogen Release Compound [HRC®], Emulsified Oil Substrate [EOS®], Sodium Lactate), MNA, and Implementation of ICs, second paragraph, page 2-21	In the last sentence of the paragraph, insert a hyphen between “area” and “specific” and “COC” and “fate”.	<p><i>Agreed. The last sentence of second paragraph within the referenced section has been updated as requested.</i></p>

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25.	Section 2.11.1, Protection of Human Health and the Environment, Soil, PCBs in Soil, page 2-21	Revise the latter part of the first sentence as follows: "...but RA S3-1 does not provide adequate protection for human health."	<i>Agreed. The first sentence of the referenced section has been updated as requested.</i>
26.	Section 2.11.2, Compliance with Applicable or Relevant and Appropriate Requirements, Soil, page 2-22	It is stated in this section that Response Action 2S-2, Implementation of Land Use Controls, will comply with chemical-specific ARARs for arsenic, PAHs, and PCBs in soil. EPA requests that language be added to this section explaining how the implementation of land use controls for these contaminants in soil will comply with chemical-specific ARARs.	<p><i>Agreed. Section 2.11.2 has been revised as follows:</i></p> <p><i>"Arsenic and PAHs in Soil: RAs S2-3, S2-4, and S2-5 will comply with chemical specific ARARs. S2-2 will comply with chemical specific ARARs by implementing ICs and ECs to control exposure to contaminants that may result in unacceptable risk to human health until such a time that unrestricted use and unlimited exposure may occur. RAs S2-2, S2-3, S2-4, and S2-5 will comply with action- and location-specific ARARs.</i></p> <p><i>PCBs in Soil: RA S2-3 will comply with chemical specific ARARs through active removal. S2-2 will comply with chemical specific ARARs by implementing ICs and ECs to control exposure to contaminants that may result in unacceptable risk to human health until such a time that unrestricted use and unlimited exposure may occur."</i></p>
27.	Section 2.12.2, Community Acceptance, page 2-25	Revise the sentence as follows: "Community acceptance is based on comments received during the public comment period on the Group 1 Sites Proposed Plan and is addressed in the Responsiveness Summary (Section 3) of this ROD.	<i>Agreed. Section 2.12.2 has been updated as requested.</i>

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28.	Section 2.14.1, Summary of the Rationale for the Selected Response Action, second paragraph, page 2-26	Change "Section 2.13.2" to "Section 2.14.2".	<i>Agreed. The section reference has been updated from "2.13.2" to "2.14.2".</i>
29.	Section 2.14.2, Detailed Description of Selected Response Action, page 2-25	It is requested that this section also include the selected response action for groundwater.	<i>Agreed. The first paragraph of Section 2.14.2 has been updated to read as follows:  "The Selected Response Action for remediation of soils at Group 1 Sites (PICA 079) includes the excavation of approximately 300 to 600 cubic yards of explosives-contaminated soil, the implementation and maintenance of land use controls for soil and groundwater contamination remaining above residential standards at the site, and the implementation of monitored natural attenuation for groundwater. The area of excavation is depicted on <b>Figure 11</b> and the area of LUC applicability is presented on <b>Figure 12</b>. Excavated soil would be transported off-site for disposal. In order to implement the Selected Response Action, the following actions will be required: "</i>
30.	Section 2.14.2, Detailed Description of Selected Response Action, page 2-25	Assuming soil contaminated with explosives is not [to] be removed to a residential levels, revise the fourth sentence as follows: "ICs would also be implemented because some arsenic, PAH, PCB and explosive contamination above residential standards would remain at the site."	<i>Agreed. The sentence has been revised as requested.</i>

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31.	Section 2.14.3, Institutional Controls, first paragraph, page 2-26	<p>a. In the first sentence, replace “during” with “following”.</p> <p>b. Add the following sentence to the end of the first paragraph: “Within 90 days of ROD signature, the Army shall prepare and submit to EPA for review and approval a LUC remedial design that shall contain implementation and maintenance actions, including periodic inspections.”</p>	<p><i>a. The first sentence has been updated as requested.</i></p> <p><i>b. Agreed. The last sentence of the first paragraph within Section 2.14.3 has been updated to read as follows:</i></p> <p><i>“The area of LUC applicability for Group 1 Sites is depicted on Figure 12. A change in land use would include notifying the regulators.”</i></p> <p><i>In addition, the following text has been added to replace the second paragraph within Section 2.14.3:</i></p> <p><i>“An LUC Remedial Design will be prepared as the land use component of the Remedial Design and will include the LUCs that will be implemented at the Group 1 Sites. Within 90 days of ROD signature, the Army shall prepare and submit to EPA for review and approval an LUC remedial design that shall contain implementation and maintenance actions, including periodic inspections.”</i></p>

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32.	Section 2.14.3, Institutional Controls, second paragraph, page 2-26	<p>It is requested that the second paragraph be replaced with the following:</p> <p>“The IC objectives for the Group 1 Sites are:</p> <ul style="list-style-type: none"> <li>• Maintain the CEA and prevent access or use of the groundwater until cleanup levels are met.</li> <li>• Maintain the integrity of any current or future monitoring system such as monitoring wells.</li> <li>• Prohibit the development and use of property for residential housing, elementary and secondary schools, child care facilities and playgrounds.</li> </ul> <p>These IC objectives will be met until such time as contaminant levels are sufficiently reduced to allow for unrestricted use and unlimited exposure.”</p>	<p><i>Agreed. The following text has been added as the third paragraph within Section 2.14.3:</i></p> <p><i>“The LUC objectives for the Group 1 Sites are as follows:</i></p> <ul style="list-style-type: none"> <li>• <i>Maintain the CEA and prevent access or use of the groundwater until cleanup levels are met.</i></li> <li>• <i>Maintain the integrity of any current or future monitoring system such as monitoring wells.</i></li> <li>• <i>Prohibit the development and use of property for residential housing, elementary and secondary schools, child care facilities and playgrounds.</i></li> </ul> <p><i>These LUC objectives will be met until such time as contaminant levels are sufficiently reduced to allow for unrestricted use and unlimited exposure.”</i></p> <p><i>The second paragraph has been updated per response to Comment #31.</i></p>

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33.	Section 2.14.3, Institutional Controls, third paragraph, page 2-26	It is requested that the third sentence listing exhibits in the Army's plans be embellished on to explain more fully how they contribute to the Army LUCs.	<p><i>Agreed. The reference to 'exhibits' is consistent with terminology used in the NJDEP Deed Restriction Policies. The intent of the third sentence was to state that many of these exhibits already exist in primarily CERCLA documents. The second and third sentence has been revised as follows:</i></p> <p><i>"Requirements of NJDEP Deed Restriction policies will be included in the LUC Remedial Design. Many of the exhibits required by these policies, such as site maps, engineering drawings, and location maps, are already incorporated into CERCLA documents (such as attached Figures 1 and 12 of this ROD) and will be included in the Remedial Design."</i></p>
34.	Section 2.14.3, Institutional Controls, third paragraph, page 2-26	The first bullet states: "Install and maintain engineering controls (typically signs) be the IC Remedial Design;" It should be noted institutional controls are administrative measures while engineering controls are physical measures such as signs, fences, covers, etcetera. As previously stated, land use controls include institutional controls and engineering controls.	<p><i>Comment noted. The first bullet has been updated to read as follows:</i></p> <p><i>"Install and maintain engineering controls (typically signs) per the LUC Remedial Design."</i></p> <p><i>In addition, the reference to ICs has been replaced with "LUCs" as appropriate.</i></p>
35.	Section 2.15, Statutory Determinations, page 2-27	In the next to last sentence of the paragraph, change "bias" to "biased".	<p><i>Agreed. The next to last sentence of the referenced section has been updated as requested.</i></p>

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36.	Section 3.1.2, Summary of Comments Received During the Public Meeting on the Proposed Plan and Agency Responses, page 3-30	Revise Mr. Gabel's response to Comment 2 as follows: "There is a fish advisory, as there are for most New Jersey lakes, due to the presence of PCBs and mercury."	<i>Agreed. Mr. Gabel's response to Comment 2 has been updated as requested.</i>						
37.	Table 5, Human Health Risk Assessment Results, Group 1 Sites	<p>Table 5 tabulates the Human Health Risk Assessment Results which is inconsistent in the Receptor Column with the ROD language.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><u>Receptors listed in Table 5 language</u></td> <td style="width: 50%; border: none;"><u>Receptors in ROD</u></td> </tr> <tr> <td style="border: none;">Industrial Research Worker</td> <td style="border: none;">Industrial/research worker</td> </tr> <tr> <td style="border: none;">Construction Worker</td> <td style="border: none;">Construction/excavation worker</td> </tr> </table>	<u>Receptors listed in Table 5 language</u>	<u>Receptors in ROD</u>	Industrial Research Worker	Industrial/research worker	Construction Worker	Construction/excavation worker	<i>Table 5 has been updated to be consistent with those receptors identified within the ROD text.</i>
<u>Receptors listed in Table 5 language</u>	<u>Receptors in ROD</u>								
Industrial Research Worker	Industrial/research worker								
Construction Worker	Construction/excavation worker								
38.	Table 13, Surface and Subsurface Soil Chemical-Specific TBCs	<p>a. Change "Proposed rule" to "Promulgated rule" for Soil cleanup criteria (SCC) NJAC 7:26D in the Requirement of Law/Regulation column.</p> <p>b. Change column heading "TBC Status" to "ARAR/TBC Status".</p> <p>c. Change TBC Status for Soil cleanup criteria (SCC) NJAC 7:26D to "ARAR for dermal/ingestion health based criterion only".</p>	<i>a., b., and c. Agreed. The requested changes have been made to Table 13.</i>						