



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Emergency Management Program

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BOB MARTIN
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Charles H. Koehler, Lieutenant Colonel,
US Army Garrison Commander
Department of the Army
Installation Management Command
Headquarters, United States Army Garrison, Picatinny Arsenal
Picatinny Arsenal, New Jersey, 07806-5000

JUN 27 2011

RE: Record of Decision
Record of Decision – Site 78
Picatinny Arsenal, Morris County
CERCLIS - EPA ID# NJ3210020704

Dear LTC Koehler:

The New Jersey Department of Environmental Protection (NJDEP) has evaluated the selected final remedy for Site 78 at Picatinny Arsenal, and does not concur with the remedy as stated in the Record of Decision (ROD) dated March, 2010. Site 78 is designated in the Army Environmental Data Base-Restoration (AEDB-R) as PICA-013.

The Record of Decision for Site 78 pertains to groundwater and surface water and documents the selection of a remedial action involving Monitored Natural Attenuation, Surface Water Monitoring, and Land Use Controls for a thirteen year duration after remedy selection. However, the remedial action alternative involving in-situ chemical oxidation offers six years effectiveness after remedy implementation at relatively minimal additional expense. NJDEP believes that a more aggressive alternative can be implemented but there are concerns regarding the use of in-situ chemical oxidation in close proximity to wetlands. Since the sodium lactate treatment proved to be a success with the pilot study, it appears to be worth considering again as part of the final remedy. Sodium lactate, an organic carbon would fall under the Reductive Dechlorination alternative with a short restoration timeframe.

If you have any questions please feel free to contact me at 609-633-2168.

Sincerely,

Bob Van Fossen, Assistant Director
Emergency Management Element

c. Walter Mugdan, Director, Emergency and Remedial Response Division, USEPA Region II ✓