

**Comments and Responses on the 2008 Annual Surface Water and Sediment Monitoring Report
for U.S. Army Garrison Picatinny Arsenal, New Jersey
Green Pond Brook/Bear Swamp Brook (PICA 193)
Picatinny Arsenal, Morris County, New Jersey
November 2009**

**Commenter: Vince Pitruzzello, Chair, Region II Biological Technical Assistance Team (ERRD-PSB)
Comments Dated: January 26, 2010**

Item No.	Report Reference	Comment	Response
1.	Section 5.3	<p>The Exit Strategy section indicates that sample location GPBSD-26 is the single location where the contaminants of concern (COCs) exceed remediation goals (RGs) and toxicity tests show severe toxicity. However, there are several sample locations (e.g., SDBS-23, SDBS-24, C-34-SD-3, C-34-SD-4) with contaminant concentrations which exceed the RGs where no toxicity testing was conducted. These locations should be addressed in the Exit Strategy section.</p>	<p><i>Agreed. However, the commenter incorrectly references C-34-SD-3 as a sample with COCs above RGs. After reviewing Table 5, there are no contaminant concentrations that exceed RGs for this sample location. Therefore, the second paragraph of Section 5.3 has been updated to read as follows:</i></p> <p><i>“COCs that exceeded RGs were also documented at three other sampling locations: SDBS-23, SDBS-24 and C-34-SD-4. Samples collected at these locations were only evaluated for chemical analysis. However, the remaining biological sampling locations within Regions 2, 3, and 4 appear to show stable, if not improved, results in 2008 compared to 2007, and none of these locations display all of the criteria for potential biological impacts indicated above. Data from the toxicity test sampling locations within Regions 3 and 4 and a discussion of these analytical results represents the biological evaluation conducted in the vicinity of the three samples identified above and can be found in Sections 3.2 and 3.3.</i></p> <p><i>Because the Exit Strategy criteria listed in the matrix typically require a comparison of 2 or more years of data out of a 5-year monitoring period, and these sampling locations do not currently meet the criteria for discontinuing the monitoring, they will all be monitored in 2009 for the same parameters evaluated in 2007 and 2008. Results of the 2009 monitoring event will be compared to the Exit Strategy criteria and a decision regarding future monitoring will be made at that time.”</i></p>

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2.	General	The chemical monitoring summaries indicate that the contaminant concentrations in some of the sediment sampling locations have decreased. Further information should be included in the document regarding why these concentrations have decreased.	<i>Noted. The likely reason for concentration decreases is dilution, as all known contamination source areas have been addressed. However, as Green Pond Brook is the main surface water body for drainage at the Picatinny Installation, with various water sources and numerous stream characteristics, it is difficult to identify exact causes for decreasing contaminant concentrations. However, in accordance with the long-term monitoring program GPB will continue to be monitored until 2012 in order to complete 5 years of monitoring and fully document stable or decreasing concentrations.</i>
3.	Table 2	Table 2 indicates that sample location 31SD-4 contained 565 mg/kg of zinc which exceeds the RG (456 mg/kg). However, the value is not shaded as per the instruction on the footnote of the table.	<i>Table 2 has been updated to include the shaded value of 565 mg/kg of zinc for sample location 31SD-4.</i>

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4.	Table 3	The sampling location SDBS-23 appears to have a concentration of 382,000 ppb of Aroclor 1242 according to Table 3. This significant PCB detection should be discussed in the document	<p><i>Agreed. The following text has been inserted as the second paragraph of Section 3.2.1, below the bulleted RG exceedances:</i></p> <p><i>“Although an RG does not exist for the PCB Aroclor 1242, it should be noted that a high concentration of this contaminant (382,000 ug/kg) was detected at sampling location SDBS-23.”</i></p> <p><i>In addition, the third bullet of Section 4.2.1 will be updated to read as follows:</i></p> <p><i>“All other COCs in Region 3 appear to have stable or decreasing concentrations. Although not a COC, the detection of Aroclor 1242 at SDBS-23 at 382,000 ug/kg is believed to be an isolated event and will be monitored closely during future sampling events.”</i></p>