



DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, PICATINNY
PICATINNY ARSENAL, NEW JERSEY 07806-5000

June 19, 2014

REPLY TO ATTENTION OF
Environmental Affairs Division

SUBJECT: Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/Interagency Agreement (IAG) Administrative Docket No. II-CERCLA-FFA-001-04: Submittal of Revised **Draft Lakes Feasibility Study**: Reviews are ER,A-eligible

Mr. William Roach
U.S. Environmental Protection Agency
290 Broadway, 18th Floor
New York, NY 10007-1866

Ms. Anne Pavelka, Case Manager
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
401 East State Street, Floor 5
Trenton, New Jersey 08625-0028

Mr. Roach and Ms. Pavelka:

Attached for your review is a **Draft Lakes Feasibility Study (FS)**. Only sections addressing Lake Picatinny from the approved 2012 FS were changed based on agreements that were made at the February 6th strategy meeting:

1. Include an active "dig and haul" alternative for five hot spots;
2. Adds the 5th hot spot to the 4 hot spots originally identified. This was agreed when we discussed at the February 6th meeting the TNT-contaminated sediment data identified from Group 1's monitoring program;
3. Includes and refers to the "**Benthic Macroinvertebrate and Sediment Sampling Data Summary Report**" (Appendix 2) that was previously provided in a January 31st 2013 email and discussed at the February 6th meeting;
4. Uses both the sediment clean-up criteria from the Green Pond and Bear Swamp Brook Site Record of Decision and the previously-used TNT criteria that had not been discussed at the meeting. Both were used to develop the cost analysis to determine extent for a sediment removal. This cost estimate based on use of these criteria is over \$4M.

Unfortunately this version of the FS is the last iteration that will be revised by ARCADIS. The Army Team has determined it will be more efficient and appropriate in regard to the ARCADIS's PBC to require the next PBC contractor to make any changes to this FS. The changes to the FS will include changes based on your comments as well as comments developed by the Army as noted below. I ask that you take these comments in light of your review of this draft.

Comments from the Army include:

1. Any text regarding Alternative 2 Land Use or Institutional Controls control to prevent or limit exposure to the sediment is not an appropriate alternative: "critters' will not heed to government controls, signs and policy. Text on the LUC alternative will be stricken based on this comment;
2. Comments from the Environmental Health Risk Assessment Program of Army Institute of Public Health will be addressed and the text of the FS will change accordingly. The comments are attached to this letter; the most important comment being:

" , , that the need to further address areas of Picatinny Lake contamination is not justified, given that risks and hazards for the lake are shown to be acceptable."
3. Reference to the existing Picatinny regulations regarding fish consumption will need to be updated as the Picatinny regulations were updated recently. Also reference to the Picatinny website will be made: the website includes the table of the fish consumption restrictions suggested by the NJDEP specific to Picatinny water bodies.
4. Reference to permits needed for a dig and haul alternative would be changed. The text will note something to the effect that 'substantive requirements of the applicable regulation or ARAR will be complied with". Permits are not necessary for CERCLA actions.
5. References to DEH (Department of Engineering and Housing) will be changed to "Picatinny" as the DEH is not a correct acronym anymore.

As you know, I am opposed to the Army proposing an active dig and haul alternative.

Sincerely,



**Ted Gabel, Project Manager for
Environmental Restoration**

Enclosures

CC: Letter only

Mr. Jim Kealy, NJDEP Mr. Joe Marchesani, NJDEP

Ms. Barbara Dolce, TAPP Contractor (FTP site only)

Mr. Mike Clemston, EPA

Mr. Allan Motter, NJDEP