

ENVIRONMENTAL HAPPENINGS AT PICATINNY ARSENAL

VOLUME 5, ISSUE 4 FALL 2007

VIOLATORS TO HEAR FROM NJDEP

The NJDEP issued an enforcement alert (#2007-12) in September 2007 that described the Site Remediation Program's effort to enforce monitoring and reporting requirements. The diverse subject offenders were those that were required to monitor the effectiveness of a remedial action (including engineering and/or institutional controls) and submit a biennial certification and report to the NJDEP but had failed to do so. The enforcement alert can be accessed at <http://www.nj.gov/dep/enforcement/advisories-sr.htm>. In the alert the NJDEP provided the following definitions of engineering controls and institutional controls and explained the reasons for targeting violations:

'Engineering controls include any physical mechanism to contain or stabilize contamination or ensure the effectiveness of a remedial action, including but not limited to caps, signs, fences, ground water containment systems, slurry walls and ground water pumping systems. Institutional controls include mechanisms used to limit human activities at or near a contaminated site or to ensure the effectiveness of the remedial action over time when contaminants remain at levels above the applicable remediation standards that allow for the unrestricted

use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, ground water classification exception areas, deed notices, and declarations of environmental restrictions.

The Department's receipt of biennial certifications and monitoring reports is the only means through which the Department can ensure that long-term monitoring and maintenance occurs and that the implemented remedy remains protective over time. The Department must rely on self-monitoring and reporting by those responsible due to the volume of such sites with respect to available Departmental resources. Monitoring the protectiveness of the remedy is critical particularly in light of potential exposure in the event that the property use changes to one that is inconsistent with the restrictions specified in the remedy.'

It was reported in the alert that the NJDEP had notified responsible parties in March 2007 and would begin issuing enforcement

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IN THE FIELD.....

Recent field activities for September, October, and November 2007 included the following:

Site 25/26: Placement and grading of top soil; site maintenance. (September)

Area E/Near Bldg 80 Wastewater Treatment

Plant: Monitoring well installation and groundwater sampling. (September)

200 Area/Robinson Enclosures/Bear Swamp Brook between Bldgs 234 & 235: Backfilling and restoring stream.

Area D: Excavation at oil-

water separator; building

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Editorial Reviewers

David Forti, Michael Glaab,
Courtenay Huff

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Ted Gabel, William Roach,
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POINTS OF INTEREST:

•The next RAB meeting is tentatively scheduled for January of 2008 at either the Hilton Garden Inn in Rockaway, New Jersey or at Picatinny Arsenal. Once confirmed the date and location will be posted on the PAERAB's website and in local newspapers.

•ARCADIS conducted a technical meeting to discuss issues relating to their investigative and remedial activities at Picatinny Arsenal on October 24, 2007. Representatives of Picatinny Arsenal, the Army Environmental Command, USEPA, NJDEP, and the RAB were present. The next technical meeting is tentatively scheduled for December 12th.

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NEED FOR FOSL REITERATED BY EPA

At the October 2007 technical meeting the EPA reiterated its requirement for a Finding of Suitability to Lease (FOSL) before certain facilities at Picatinny Arsenal may be approved for leasing. The same topic had been discussed at the July 19, 2007 technical meeting after an e-mail communication from the EPA dated July 11, 2007 broached this topic. Picatinny Arsenal submitted a FOSL in a timely manner but subsequent to that submittal changes were necessitated. For example, the original submittal for a FOSL covered only the buildings in the affected area and not the land itself. After the technical meeting Mr. Bill Roach, the USEPA Project Manager responsible for Picatinny Arsenal, elaborated on the FOSL requirements in two different transmittals to Picatinny Arsenal.



The EPA noted that the Federal Facility Agreement, Section XXVIII, Transfer of Property states: "In the event the Army determines to enter into any contract for the sale or transfer of any portion of the Site, the Army will comply with the requirements of CERCLA Section 120(h), 42 U.S.C. Section 9620(h), in effectuating that sale or transfer, including all notice requirements. In addition, the Army shall include notice of this Agreement in any document transferring ownership or operation of the Site to any subsequent owner and/or operator of any portion of the Site and shall notify USEPA of any such sale or transfer and the provisions made for any additional remedial action measures, if required, at least ninety (90) days prior to such transfer." CERCLA Section 120(h) pertains to property transfers.

AREA B'S FATE YET TO BE DETERMINED.....

At the technical meeting on September 12th, ARCADIS presented another approach for Area B. Work at the site had been suspended several months prior due to the detection of munitions explosives constituents (MEC) during drilling for injection well installation. Previous detections of MEC by Shaw Engineering (Shaw) had been at the pe-

rimeter of the area near the truck entrance. However, a driller retained by ARCADIS had recovered an aluminum fuze during drilling. As a result ARCADIS proposed at the spring technical meeting to abandon the previously decided on remedy and to instead pursue monitored natural attenuation (MNA) of groundwater at the site. ARCADIS cited safety con-

cerns to justify the use of MNA. However, the MNA approach was rejected during a heated discussion by regulators who questioned abandoning an active approach. The USEPA also requested that costs for MEC clearance be presented before a final decision is made. Extensive prior intrusive field work by Dames & Moore and also by Shaw had been completed without incident with

the exception of a detection near the truck entrance by Shaw.

At the September 2007 meeting ARCADIS presented best- and worst-case scenarios for MEC clearance with costs ranging from \$250,000 to \$2 million. It was agreed that the path

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TRAINING OPPORTUNITIES



The Interstate Technical Regulatory Council (ITRC) has scheduled the following on-line courses:

- "Planning and Promoting of Ecological Land Reuse of Remediated Sites," November 15th from 11 am to 1:15 pm

- "Protocol for Use of Five Passive Samplers," November 29th from 11 am to 1:15 pm
- "Vapor Intrusion Pathway: A Practical Guideline," December 4th from 2 to 4:15 pm

The courses are free. Register

on-line at www.itrcweb.org/ibt.asp.

The USEPA Technology Innovation Program has internet courses scheduled as follows:

- "Resources for Ecological Revitalization at Federal

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PROGRESS MEASURED IN PAST YEAR

ARCADIS reported that there had been eight sites that were taken to Remedial Action in Place (RIP) in Fiscal Year 2007 (FY '07). These sites are as follows:

- PICA 065 Post Farm Landfill
- PICA 066 Site 20/24
- PICA 067 Site 25/26
- PICA 093 Site 180
- PICA 193 Green Pond Brook/Bear Swamp Brook
- PICA 076 Area D

- PICA 077 Area E
- PICA 020 13 Sites

Three of the sites (PICA 067, PICA 093, and PICA 077) had Records of Decision (RODs) signed in FY'07.



MORE REORGANIZATION AT NJDEP

The NJDEP is currently implementing several initiatives — including reorganization - to improve itself. Future RAB correspondence with the NJDEP will reflect these changes. For example, one initiative which may not affect Picatinny Arsenal is the unregulated tank program. In October and November of 2007 the NJDEP is holding training orientations and soliciting applications from consultants for a new

program to replace the Cleanup Star program. This program will apply only to certain types of unregulated underground storage tanks (USTs) and is an attempt to alleviate the case burden of DEP project managers who are being overwhelmed by homeowner UST projects. Other changes have involved reorganization within different groups of the NJDEP. Following is the new chain of command in the Site Remediation Group with which Msrs. Greg Zalaskus,

Joe Marchesani, and Jim Kealy are all affiliated with :

1. Lisa Jackson, NJDEP Commissioner
2. Irene Kropp, Assistant Commissioner, Site Remediation and Waste Management Program
3. Len Romino, Assistant Director, Division of Remedial Management and Response
4. Steve Maybury, Bureau Chief, Bureau of Case Management

5. Roman Luzecky, Section Chief, Bureau of Case Management
6. Greg Zalaskus, Case Manager, Bureau of Case Management

The RAB was unofficially informed that Mr. Maybury may attend a RAB meeting. PAERAB Co-chmn. Michael Glaab stated that “Mr. Maybury and any or all of the above are welcome to attend RAB meetings...”

TRAINING OPPORTUNITIES (CONT'D)

- Agencies,” November 27th from 1 to 3 pm
- “Ecological Revitalization Resources Available through EPA - Part 1,” December 3 from 1 to 3:00 pm
- “Ecological Revitalization Resources Available through EPA - Part 2,” December 5th from 2 to 4 pm

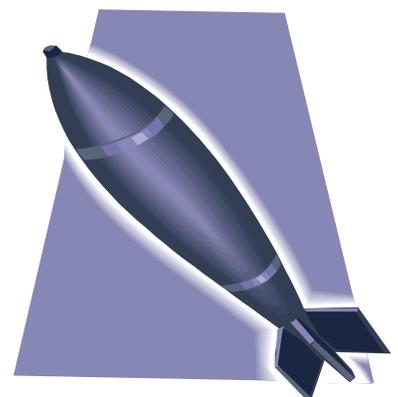
Register for the free classes at <http://clu-in.org/training> .

AREA B (CONTINUED)

forward would be to initiate MEC clearance only in those locations designated for pre-design well installation. Eight such locations have been established. At a future “Remedy Re-evaluation Decision Point” a decision to clear or not to clear addi-

tional areas is expected to be made. This decision will be based on the MEC findings during the work at the eight locations. After the new wells have been sampled and after the data previously collected via Hydropunch has been analyzed, another deci-

sion point will occur at which the focus of deliberation will be the concentration and distribution of constituents of concern (COC). No further work had taken place as of the October 24, 2007 meeting.



DEP VISITS PICATINNY ARSENAL TO HEAR WATERWAY CONCERNS

The NJDEP Commissioner, Ms. Lisa Jackson, accompanied by NJDEP personnel and such elected representatives as NJ State Senator Anthony Bucco, visited Picatinny Arsenal to meet with Army representatives and to hear their concerns about the impact of proposed NJDEP rules concerning C-1 waterways. Mr. Tom Solecki of the Picatinny Arsenal Environmental Affairs Office reported at the

last RAB meeting that the Army had submitted comments to the NJDEP on the rule proposal. Mr. Solecki said that Picatinny Arsenal was the only Army installation to be affected and that the rule if enacted would affect building on over 1,200 acres at the facility. Few details about the visit were available at the time of writing this article .



The NJDEP will either adopt the waterway rules with minor changes or it will have to repropose the rules if extensive changes are incorporated as a result of comments having been received from the public. Two other groups which submitted comments are the New Jersey Builders Association

and the New Jersey Business and Industry Association. Based on the widespread reach of the rule proposal it is likely that the NJDEP was deluged with comments. In addition to affecting proposed development at Picatinny Arsenal the rule proposal could affect upcoming remediation at sites in close proximity to the numerous drainages and streams at the facility.

NEW PUBLICATIONS OF INTEREST

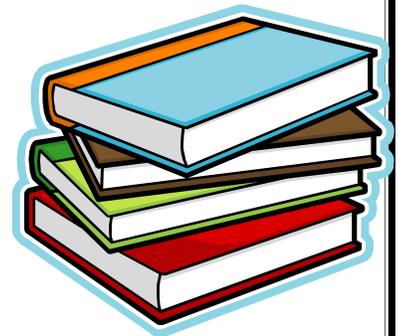
TechDirect (November 1, 2007), a service of the U.S. Environmental Protection Agency, reported the following new documents and web resources that may be of interest to readers:

- Protocol for In Site

Bioremediation of Chlorinated Solvents Using Edible Oil. View or download at <http://clu-in.org/techpubs.htm>

- Perchlorate Removal, Destruction, and Field Monitoring

Demonstration (CU-0312). View or download at <http://www.estcp.org/viewfile.cfm?Doc=ER%2D0312%2DFR%2Epdf> or at <http://clu-in.org/techpubs.htm>



IN THE FIELD...(CONTINUED FROM P. 1)

survey for indoor air sampling at Buildings 102, 34, 61, and 62.

NJDEP VIOLATION (CONTINUED FROM P. 1)

actions in October of 2007. Responsible parties affected by this action could include those that are party to a Declaration of Environmental Restriction or Classification Exception Area (CEA). On a separate site (http://datamine2.state.nj.us/dep/DEP_OPRA/Intro.htm) the NJDEP provided a list of biennial certification requirement violators. Picatinny

Arsenal was able to avoid any penalties related to the biennial certification requirement for the CEA by requesting an extension for submittal of the certification. The CEA was originally submitted to the NJDEP in 2002. The reporting requirement was a topic of discussion at the September 2007 technical meeting. After discussion the Army decided to file for an extension

from the NJDEP. This permits the Army more time to revise the CEA and to conform to public notice requirements. The revised CEA is expected to be completed in December 2007.

NEW COMMANDER ATTENDS RAB MEETING

Lieutenant Colonel John Stack attended the most recent RAB meeting on September 20, 2007. LTC Stack introduced himself to the attendees and explained his interest in land stewardship issues. The commander's biography from the Picatinny Arsenal Garrison webpage is as follows: "Lieutenant Colonel John P. Stack was commissioned as an Infantry Officer in 1989 following graduation from Rutgers University. He comes most recently from Tampa, Florida, where he served as a J-3 Operations Officer for the CENTCOM AOR focused Regional Working Group while

assigned to the Center for Special Operations, United States Special Operations Command, MacDill AFB, FL.

Previous assignments include:

Executive Officer, 2d Battalion, 3d Special Forces Group (Airborne), Commander, Bravo Company, 2d Battalion, 3d Operations Command, Fort Bragg, NC; Chief, Special Operations Forces Readiness Training Center, Fort Polk, LA; commander, Special Forces Operational Detachment Alpha (SFODA) 794, and Commander SFODA 796, Charlie Company, 3d Battalion, 7th Special Forces Group, Panama;



Commander, SFODA 742, Alpha Company, 2d Battalion, 7th Special Forces Group, Fort Bragg, NC. LTC Stack's assignments in the Infantry include Battalion

Support Platoon Leader, Company Executive Officer, and Rifle Platoon Leader in the 3d Battalion, 7th Infantry Regiment, 24th Infantry Division, Fort Stewart, GA."

LTC Stack said that his previous assignments had focused on the tactical portion of the Army's mission and that he was looking forward to the challenge of land and environmental stewardship. He also noted that he is a former New Jersey resident

and that his wife and three children were at the base with him. Finally LTC Stack noted that every action not only affects the workforce but families on-post and neighbors off-post.

The PAERAB welcomed LTC Stack to Picatinny Arsenal and it expressed its sincere appreciation of his interest. According to RAB Co-chmn. Michael Glaab, "LTC Stack's attendance and participation in future RAB deliberations is most welcome and we consider it an honor to have him join us and contribute synergistically to our efforts".

AMBITIOUS SCHEDULE FOR ARCADIS IN FY'08

At the recent October 2007 technical meeting ARCADIS stated that their goal for Fiscal Year 2008 (FY'08) is to complete 11 Records of Decision (RODs). Following is the list of sites that will be the focus:

- PICA 013 Optics Lab
- PICA 204 Mid-Valley
- PICA 057 Picatinny Lake/Lake Denmark
- PICA 102 Site 61/104
- PICA 008 Group 3 Sites
- PICA 079 Group 1 Sites
- PICA 072 Former DRMO Yard
- PICA 020 13 Sites
- PICA 205 Area B

FY'08; those sites are the 600 Area and the Perchlorate Area.

Two other sites are being worked on by Shaw Engineering and are part of the goal for

TCRA IN RESIDENTIAL AREA TO PROCEED SOON

The contract for the time-critical removal action (TCRA) in the area slated for new residential housing was

awarded in October 2007 and work on the project will begin shortly. The same team that performed the munitions ex-

plosives constituents (MEC) removal at Tilcon Quarry will return to work in the residential area.

MORRIS COUNTY REPRESENTATIVE

During the September 20th meeting of the Picatinny Arsenal Environmental Restoration Advisory Board (PAERAB) Ms. Virginia Michelin was formally ap-

proved by unanimous vote to be the official County of Morris representative to the PAERAB. Mr. Glaab stated that "Ms. Michelin replaces Ms. Cynthia Sopke who had

ably served in that capacity after the departure of Mr. Walter Kritch a long standing and esteemed member of the RAB whose knowledge, experience and insight

contributed significantly to the environmental remediation effort at Picatinny Arsenal."



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PICATINNY ARSENAL IS ON
THE WEB

<http://www.pica.army.mil>

PICATINNY ARSENAL ENVIRONMENTAL RESTORATION ADVISORY BOARD

Community Representatives

Mr. Wesley Ackerson, dec.— Jefferson Twp. Rep.

Mr. Louis Correale – Rockaway Twp. Rep.,
Rockaway Township Health Department

Mr. Don Costanza – Town of Dover Rep.,
Dover Health Department

Mr. Robert Crothers – Twp. of Denville Rep.

Mr. David Forti, PE, CHMM – Community Rep.

Mr. Michael Glaab – Community Rep.,
RAB Co-Chair: Community

Mr. Mark Hiler – Community Rep., Rockaway
Twp. Environmental Commission

Ms. Courtenay Huff – Community Rep.

Dr. Peter Lederman, PE, DEE – NJIT Rep.

Mr. Paul McGinley – Borough of Wharton Rep.

Mr. Cliff Morris - Community Rep.,
Tilcon NY, Inc.

Ms. Virginia Michelin – County of Morris Rep.
County of Morris Planning,
Development and Technology

Dr. Raymond Westerdahl – Union Rep., NFFE

Exofficio Members

Mr. Ted Gabel – Project Manager for
Environmental Restoration,
RAB Co-Chair: DoD, US Army

Mr. William Roach – U.S. Environmental
Protection Agency

Mr. Gregory Zalaskus – New Jersey Department
of Environmental Protection

If you have any questions or require additional information on any of the subjects in this newsletter, please contact Barbara Dolce at Subsurface Solutions LLC. Subsurface Solutions LLC is the Technical Assistance for Public Participation (TAPP) contractor for the Picatinny Arsenal Environmental Restoration Advisory Board (PAERAB).

In accordance with federal regulations PAERAB meetings are open to the public and attendance by the community is encouraged. The date and time of an upcoming PAERAB meeting are advertised in local newspapers. For further information please contact Michael Glaab (PAERAB Community Co-Chair) at 973-663-9605 (michaelglaab@worldnet.att.net) or the Environmental Affairs office at Picatinny Arsenal (Ted Gabel, PAERAB Army Co-Chair at 973-724-6748).

The TAPP - Technical Assistance for Public Participation program is a DOD program that provides a mechanism for community members of Restoration Advisory Boards and Technical Review Committees to obtain technical assistance. Its purpose is to provide citizen and/or community groups with professionals to assist them in their review of environmental issues at military installations. For example, a TAPP process may involve helping the public understand environmental remediation alternatives by providing an unbiased technical analysis and recommendation.

The newsletter is intended to provide an update on newly drafted documents, field activities at Picatinny Arsenal, upcoming events related to environmental issues at the site, and discussions at technical meetings. In addition, notice of new or revised Federal or State regulations may also be included.

The PAERAB also maintains a website at <http://www.pacerab.us>.

HOT OFF THE PRESS....

● Remedial Action Work Plan - PICA 020 Group of Sites, Draft Final, August 20, 2007

● Land Use Control Plan - Area D Groundwater, Remedial Design Addendum 01, Draft Final, August 23, 2007

● Proposed Plan for Area C Groundwater, Final, September 18, 2007

● Remedial Action Report Site 23 (PICA 065) - the Post Farm Landfill, Draft, September 2007

● Time Critical Removal Action Report—Mount Hope Quarry, Morris County, NJ, Draft Final, September 2007

● Proposed Plan Sites 31 and 101 (PICA 072) Former DRMO Yard and Former Gas Station, Final, September 28, 2007

● Remedial Action Work Plan Site 180 (PICA 093), Waste Burial Area, Final, October 5, 2007

● Record of Decision Area E Groundwater and Site 22, signed, October 23, 2007

● Record of Decision for Site 180, signed, October 23, 2007



Documents can be reviewed by the public at the Rockaway Township Library and

Morris County Library

Both sites maintain a repository of Proposed Plans and Records of Decision. Other documents and final reports are in the Administrative Record which is maintained in Building 319 at Picatinny Arsenal. Call ahead to schedule to review the record.