

# RECORD OF DECISION FOR 600 HILL WASTE PIT (PICA-058/SITE 12 and PICA-013-R-01)

PICATINNY ARSENAL NEW JERSEY

Final

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# TABLE OF CONTENTS

# Page

|     | LIST (<br>LIST (         | OF FIGURES  |
|-----|--------------------------|---|
| 1.0 | PART                     | 1: DECLARATION1-1   |
|     | 1.1<br>1.2<br>1.3<br>1.4 | SITE NAME AND LOCATION1-1STATEMENT OF BASIS AND PURPOSE1-2ASSESSMENT OF THE SITE1-2DESCRIPTION OF THE SELECTED REMEDY1-3  |
|     |                          | 1.4.1Munitions Waste Pit and TCE Source Material Removal1-31.4.2Soil Screening and Disposal1-41.4.3Munitions Inspection and Disposal1-51.4.4Carbon Substrate Amendment Application1-51.4.5Monitored Natural Attenuation Polishing1-51.4.6Land Use Controls1-61.4.7Land Use Control Inspections1-7   |
|     | 1.5                      | STATUTORY DETERMINATIONS1-8   |
|     |                          | 1.5.1   Five-Year Reviews   1-8   |
|     | 1.6                      | DATA CERTIFICATION CHECKLIST  |
| 2.0 | 1.7                      | AUTHORIZATION SIGNATURES  |
| 2.0 | PARI                     | 2: DECISION SUMMARY   |
|     | 2.1                      | SITE NAME, LOCATION AND DESCRIPTION   |
|     | 2.2                      | SITE HISTORY  |
|     |                          | <b>2.2.1</b> Picatinny Background         2-1 <b>2.2.2</b> 600 Area Background         2-2  |
|     |                          |   |
|     |                          |   |
|     |                          | 2.2.3       Site Investigations   |
|     | 2.3                      | 2.2.3 Site Investigations   |
|     | 2.4                      | <b>2.2.3</b> Site Investigations.2-3 <b>2.2.4</b> Enforcement Activities.2-3COMMUNITY PARTICIPATION.2-3SCOPE AND ROLE OF SELECTED REMEDY.2-4  |
|     |                          | 2.2.3Site Investigations  |
|     | 2.4                      | 2.2.3 Site Investigations2-32.2.4 Enforcement Activities2-3COMMUNITY PARTICIPATION2-3SCOPE AND ROLE OF SELECTED REMEDY2-4SITE CHARACTERISTICS2-52.5.1 Physical Characteristics2-5   |
|     | 2.4<br>2.5               | 2.2.3 Site Investigations.2-32.2.4 Enforcement Activities2-3COMMUNITY PARTICIPATION2-3SCOPE AND ROLE OF SELECTED REMEDY2-4SITE CHARACTERISTICS2-52.5.1 Physical Characteristics2-52.5.2 Summary of Site Information2-6  |
|     | 2.4<br>2.5<br>2.6        | 2.2.3 Site Investigations.2-32.2.4 Enforcement Activities2-3COMMUNITY PARTICIPATION2-3SCOPE AND ROLE OF SELECTED REMEDY2-4SITE CHARACTERISTICS2-52.5.1 Physical Characteristics2-52.5.2 Summary of Site Information2-6CURRENT AND POTENTIAL FUTURE LAND USE2-12   |
|     | 2.4<br>2.5               | 2.2.3 Site Investigations.2-32.2.4 Enforcement Activities2-3COMMUNITY PARTICIPATION2-3SCOPE AND ROLE OF SELECTED REMEDY2-4SITE CHARACTERISTICS2-52.5.1 Physical Characteristics2-52.5.2 Summary of Site Information2-6  |
|     | 2.4<br>2.5<br>2.6        | 2.2.3Site Investigations.2-32.2.4Enforcement Activities2-3COMMUNITY PARTICIPATION2-3SCOPE AND ROLE OF SELECTED REMEDY2-4SITE CHARACTERISTICS2-52.5.1Physical Characteristics2-52.5.2Summary of Site Information2-6CURRENT AND POTENTIAL FUTURE LAND USE2-12SUMMARY OF SITE RISKS2-132.7.1Human Health Risks2-132.7.2Ecological Risk2-152.7.3Munitions and Explosives of Concern Hazards2-15 |

|     |      | 2.9.1  | Alternative 1 – No Action   |              |
|-----|------|--------|---|--------------|
|     |      | 2.9.2  | Alternative 2 – MNA and LUCs  |              |
|     |      | 2.9.3  | Alternative 3 – ISCO, MNA Polishing and LUCs  |              |
|     |      | 2.9.4  | Alternative 4 – In-Situ Enhanced Anaerobic Bioremediation, MNA Polishin and LUCs          | $\mathbf{c}$ |
|     |      | 2.9.5  | Alternative 5 – TCE Source Material Removal, MNA Polishing and LUCs.                      |              |
|     |      | 2.9.6  | Alternative 6 – Total Munitions Waste Pit Removal, TCE Source Material                    |              |
|     |      |        | Removal, MNA Polishing and LUCs   |              |
|     |      | 2.9.7  | Alternative 7 – Total Munitions Waste Pit Removal, TCE Source Material                    |              |
|     |      |        | Removal, MNA Polishing, LUCs and Removal of DoD Military Munitions                        |              |
|     |      |        | within the Entire MRS   |              |
|     | 2.10 | COMF   | PARATIVE ANALYSIS OF REMEDIAL ALTERNATIVES  | 2-26         |
|     |      | 2.10.1 | Threshold Criteria  |              |
|     |      |        | Primary Balancing Criteria  |              |
|     |      |        | Modifying Criteria  |              |
|     | 2.11 |        | CIPAL THREAT WASTE  |              |
|     | 2.12 |        | CTED REMEDY   |              |
|     |      |        | Summary of the Rationale for the Selected Remedy  |              |
|     |      |        | Summary of Estimated Costs for the Selected Remedy  |              |
|     |      |        | Expected Outcomes of the Selected Remedy  |              |
|     | 2.13 |        | UTORY DETERMINATIONS  |              |
|     |      |        | Protection of Human Health and the Environment  |              |
|     |      |        | Compliance with Applicable or Relevant and Appropriate Requirements                       |              |
|     |      |        | Cost Effectiveness  |              |
|     |      |        | Long-Term Effectiveness and Permanence<br>Preference for Treatment as a Principal Element |              |
|     | 2.14 |        | MENTATION OF SIGNIFICANT CHANGES FROM SELECTED REME                                       |              |
|     | 2.14 |        | I PROPOSED PLAN   |              |
| 3.0 | PART |        | SPONSIVENESS SUMMARY  |              |
|     | 3.1  | PUBL   | IC ISSUES AND LEAD AGENCY RESPONSES   | 3-1          |
|     |      | 3.1.1  | Summary of Written Comments Received during the Public Comment Period                     | od 3-1       |
|     |      | 3.1.2  | Summary of Comments Received during the Public Meeting                                    |              |
|     | 3.2  | TECH   | NICAL AND LEGAL ISSUES  | 3-2          |
| 4.0 | REFE | RENCE  | S   | 4-1          |

## LIST OF FIGURES

| Number | Title  |
|--------|--|
| 1      | Picatinny Arsenal Location, Morris County, New Jersey  |
| 2      | Inactive Munitions Waste Pit Munitions Response Site (PICA-013-R-01) and 600 Area Groundwater Plume (PICA-058) Location, 600 Area  |
| 3      | 600 Hill Waste Pit, Site Boundary, 600 Area  |
| 4      | 600 Hill Waste Pit Site Features, 600 Area   |
| 5      | Summary of Groundwater Sample Results, April 2004 – February 2011, 600<br>Area   |
| 6      | Summary of Surface Water and Sediment Sampling Results, 600 Area   |
| 7      | Source Area Investigation Soil and Soil-Gas Results, Munitions Waste Pit, 600 Area   |
| 8      | Remedial Alternative 6: Munitions Waste Pit Removal, Monitored Natural Attenuation and Land Use Controls, 600 Area   |
| 9      | Remedial Alternative 2: Groundwater and DoD Military Munitions Land Use Controls, 600 Area   |
| 10     | Digital Geophysical Mapping (DGM) Results, Inactive Munitions Waste Pit,<br>Munitions Response Site, 600 Area  |
| 11     | Remedial Alternative 3: In-Situ Treatment, Injection Points and Monitored Natural Attenuation Sampling Locations, 600 Area   |
| 12     | Remedial Alternative 4: In-Situ Enhanced Anaerobic Bioremediation and<br>Monitored Natural Attenuation Polishing and Land Use Controls, 600 Area   |
| 13     | Remedial Alternative 5: Source Removal, Monitored Natural Attenuation and Land Use Controls, 600 Area  |
| 14     | Remedial Alternative 7: Munitions Waste Pit Removal, Monitored Natural<br>Attenuation, Land Use Controls, and Munitions and Explosives of Concern<br>Clearance of Entire Munitions Response Site, 600 Area |

## LIST OF TABLES

# <u>Number</u>

# <u>Title</u>

| 1 | Chronology of Investigations at the 600 Area, Picatinny Arsenal, New Jersey             |
|---|---|
| 2 | Contaminant of Concern (COC) 600 Area Groundwater, Picatinny Arsenal,<br>New Jersey     |
| 3 | Existing Monitoring Well Construction Summary, 600 Hill Waste Pit, 600 Area Groundwater |

| 4 | Chemical-Specific Groundwater Applicable or Relevant and Appropriate Requirements, 600 Area Groundwater, Picatinny Arsenal, New Jersey                                     |
|---|--|
| 5 | Action-Specific Applicable or Relevant and Appropriate Requirements for 600<br>Hill Waste Pit, Picatinny Arsenal, New Jersey   |
| 6 | Location-Specific Applicable or Relevant and Appropriate Requirements for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey  |
| 7 | Summary of DoD Military Munitions and Munitions Debris Identified in June 2011 Source Area Investigation, 600 Hill Waste Pit, Picatinny Arsenal, New Jersey                |
| 8 | Summary of Estimated Risk and Hazards from 600 Area Groundwater, Surface Water and Vapor Intrusion from In-Situ Groundwater to Building 660, Picatinny Arsenal, New Jersey |
| 9 | Comparative Analysis of Remedial Alternatives for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey  |

# LIST OF APPENDICES

# Appendix

<u>Title</u>

- A NJDEP and USEPA Proposed Plan Concurrence Letters
- B Mid-Valley Groundwater Dispute Resolution Letter (July 2009)
- C Certificates of Publication for Public Notices
- D Cost Comparison Summary for Remedial Alternatives Evaluated and Detailed Cost Tables
- E Public Comment Letters Received

# LIST OF ACRONYMS AND ABBREVIATIONS

| μg/L   | microgram(s) per liter   |
|--|--|
| μg/m <sup>3</sup>                                    | microgram(s) per cubic meter   |
| °F   | degrees Fahrenheit   |
| %  | percent  |
| AA   | Area of Attainment   |
| AECOM  | AECOM Joint Venture  |
| ANL  | Argonne National Laboratory  |
| AOC  | Area of Concern  |
| AOI  | Area of Interest   |
| ARAR   | Applicable or Relevant and Appropriate Requirement   |
| ARDEC  | Armament Research, Development and Engineering Center  |
| Army   | United States Department of the Army   |
| AWDF   | Advanced Warhead Development Facility  |
| bgs  | below ground surface   |
| CEA<br>CERCLA<br>CERCLIS<br>CFR<br>CN<br>COC<br>COPC | Classification Exemption Area<br>Comprehensive Environmental Response, Compensation, and Liability Act<br>Comprehensive Environmental Response, Compensation and Liability<br>Identification System<br>Code of Federal Regulations<br>chloroacetophenone<br>contaminant of concern<br>contaminant of potential concern |
| COPEC  | contaminant of potential ecological concern  |
| CS   | o-Chlorobenzylidenemalononitrile   |
| cy   | cubic yard   |
| DCE  | dichloroethene   |
| DDESB  | Department of Defense Explosives Safety Board  |
| DERP   | Defense Environmental Restoration Program  |
| DGM  | digital geophysical mapping  |
| DMM  | discarded military munition  |
| DoD  | Department of Defense  |
| ECC  | Environmental Chemical Corporation   |
| EOD  | Explosives Ordnance Disposal   |
| ERA  | Ecological Risk Assessment   |
| ESP  | Explosives Site Plan   |
| ESS  | Explosives Safety Submission   |
| EVO  | emulsified vegetable oil   |
| FFA  | Federal Facility Agreement   |

| FS              | Feasibility Study  |
|-----------------|--|
| ft              | foot/feet  |
| ft <sup>2</sup> | square feet  |
|                 | •  |
| GIS             | Geographic Information System                                      |
| GWSL            | Groundwater Screening Level  |
| GWQS            | Groundwater Quality Standard                                       |
| 5 m <b>Q</b> 2  |  |
| HA              | Hazard Assessment  |
| HHRA            | Human Health Risk Assessment                                       |
| HI              | Hazard Index   |
|                 |  |
| ICFKE           | ICF Kaiser Engineers, Inc.   |
| IRP             | Installation Restoration Program                                   |
| ISCO            | In-Situ Chemical Oxidation   |
|                 |  |
| IT              | IT Corporation   |
| I               | Data qualifier detected value is an estimate of the concentration  |
| J<br>L&E Madal  | Data qualifier, detected value is an estimate of the concentration |
| J&E Model       | Johnson and Ettinger Vapor Intrusion Model                         |
| LOC             | level of concern   |
| LOC             |  |
| LUC             | Land use control   |
| MC              | munitions constituents   |
| MD              | munitions debris   |
|                 |  |
| MEC             | munitions and explosives of concern                                |
| mg/kg           | milligram(s) per kilogram  |
| mm              | millimeter(s)  |
| MMRP            | Military Munitions Response Program                                |
| MNA             | Monitored Natural Attenuation                                      |
| MRS             | Munitions Response Site  |
| msl             | mean sea level   |
| MTBE            | methyl tertiary-butyl ether  |
| <b>N 1</b>      |  |
| NA              | Not Available/Not Applicable                                       |
| NCP             | National Oil and Hazardous Substances Pollution Contingency Plan   |
| NESHAPS         | National Emission Standards for Hazardous Air Pollutants           |
| NFA             | No Further Action  |
| N.J.A.C.        | New Jersey Administrative Code                                     |
| NJDEP           | New Jersey Department of Environmental Protection                  |
| NJPDES          | New Jersey Pollutant Discharge Elimination System                  |
| NPL             | National Priorities List   |
| NTCRA           | Non-Time Critical Removal Action                                   |
| O&M             | Operation and maintenance  |
| OSWER           | Office of Solid Waste and Emergency Response                       |
|                 |  |

| T teatting Theorian,                                 |  |
|--|--|
| PAERAB<br>PD<br>Picatinny<br>PID<br>PP<br>ppm<br>PTW | Picatinny Arsenal Environmental Restoration Advisory Board<br>Point Detonating<br>Picatinny Arsenal<br>photoionization detector<br>Proposed Plan<br>part per million<br>Principal Threat Waste |
| RAO  | Remedial Action Objective  |
| RCRA   | Resource Conservation and Recovery Act   |
| RDX  | Research Department Formula X (Cyclotrimethylenetrinitramine)  |
| RI   | Remedial Investigation   |
| RME  | reasonable maximum exposure  |
| ROD  | Record of Decision   |
| RSL  | Regional Screening Level   |
|  |  |
| SARA   | Superfund Amendments and Reauthorization Act   |
| SGSL   | Soil Gas Screening Level   |
| Shaw   | Shaw Environmental, Inc.   |
| SI   | Site Investigation   |
| SLERA  | Screening-Level Ecological Risk Assessment   |
| SRS  | Soil Remediation Standard  |
| SVOC   | semivolatile organic compound  |
| SWQC   | surface water quality criteria   |
| TBC  | To-Be-Considered   |
| TCE  | trichloroethene  |
| ICL  |  |
| US   | United States  |
| USACE  | U.S. Army Corps of Engineers   |
| USATHAMA   | U.S. Army Toxic and Hazardous Materials Agency   |
| USEPA  | U.S. Environmental Protection Agency   |
| UU/UE  | unlimited use/unrestricted exposure  |
| UXO  | unexploded ordnance  |
| 3.77   |  |
| VI   | Vapor Intrusion  |
| VISL   | Vapor Intrusion Screening Level  |
| VOC  | volatile organic compound  |
| WES  | Waterways Experiment Station   |
| WESTON   | Weston Solutions, Inc.   |
| WRA  | Well Restriction Area  |
| WWI  | World War I  |
| WWII   | World War II   |
|  |  |

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#### **1.0 PART 1: DECLARATION**

#### 1.1 SITE NAME AND LOCATION

Picatinny Arsenal (Picatinny) formally designated as United States (US) Department of the Army (Army), Installation Management Command, Northeast Region, Garrison Office, is located in north central New Jersey in Morris County near the city of Dover (**Figure 1**). Picatinny was included on the National Priorities List (NPL) in March 1990 and assigned a Comprehensive Environmental Response, Compensation, and Liability Identification System (CERCLIS) number of NJ3210020704. The Army signed a Federal Facility Agreement (FFA) with the US Environmental Protection Agency (USEPA) in 1991.

This Record of Decision (ROD) addresses contaminated groundwater and the explosive hazards associated with the presence of Department of Defense (DoD) military munitions in the surface and subsurface soil at 600 Hill Waste Pit. The Site is the combined acreage of the 600 Area Groundwater Plume (PICA-058/Site 12) and the Inactive Munitions Waste Pit Munitions Response Site (MRS) (PICA-013-R-01), located in Dover, New Jersey (**Figure 1**). Generally, Picatinny sites have two numbers assigned to them. The "site" numbers are individual, unique identifiers for each site that were assigned during the Site Inspection (SI)/Remedial Investigation (RI) phase of work. The "PICA" numbers were assigned to individual sites or to groups of sites in order for the Army to track progress on environmental sites on a national basis in the Army Environmental Database. Picatinny sites geographic locations are also identified by their area.

To ensure that the areas with the greatest potential for environmental contamination were addressed first, the Army categorized the sixteen areas of the base into Areas, A (greatest potential) through P (least potential). These areas were delineated in the RI Concept Plan (Argonne National Laboratory [ANL], 1991). The Army further grouped these Areas into three phases, with Area A investigated separately. Phase I included Areas B though G, Phase II included Areas H through K, and Phase III included Areas L through P. Picatinny Arsenal RI Concept Plan Areas are shown on **Figure 1**.

The 600 Hill Waste Pit addressed in this ROD is comprised of the following two sites located in Area N, which are shown separately on **Figure 2**:

- The 600 Area Groundwater Plume (PICA-058), which covers the trichloroethene (TCE)impacted groundwater in the vicinity of the Advanced Warhead Development Facility (AWDF). The plume encompasses approximately 28 acres. This site was investigated under the Army's Installation Restoration Program (IRP).
- The Inactive Munitions Waste Pit MRS (PICA-013-R-01), a 21-acre area that partially overlaps the area of the 600 Area Groundwater Plume (PICA-058) and determined to be the source of the TCE-impacted groundwater. The MRS encompasses the 0.24-acre Munitions Waste Pit (depicted on **Figure 2** as the extent of the waste material). This MRS was investigated under the Army's Military Munitions Response Program (MMRP).

The Site boundary for the 600 Hill Waste Pit is shown in **Figure 3** and the Site features are depicted in **Figure 4**.

# **1.2 STATEMENT OF BASIS AND PURPOSE**

This ROD for 600 Hill Waste Pit presents the Selected Remedy for the site. The Selected Remedy was chosen by the Army, as the Lead Agency, in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, Executive Order 12580, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) as required by the Defense Environmental Restoration Program (DERP). The USEPA is the lead regulatory agency. The information supporting the decisions on the Selected Remedy presented in this ROD is contained in the Administrative Record for the site. The Administrative Record is available at the locations listed in Section 2.3 of this ROD. The USEPA and New Jersey Department of Environmental Protection (NJDEP) concur with the Selected Remedy, as presented in the September 2018 Final Proposed Plan (PP) (Army, 2018). Copies of the concurrence letters are included in Appendix A.

## **1.3** ASSESSMENT OF THE SITE

The Selected Remedy presented in this ROD is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment at 600 Hill Waste Pit. The Selected Remedy addresses contaminated groundwater and the explosive hazards associated with the presence of DoD military munitions, herein referred to as "*munitions*", (i.e., unexploded ordnance [UXO] and discarded military munitions [DMM]), evaluated by military explosive ordnance disposal (EOD) personnel or similarly qualified personnel and determined to pose an explosive hazard, are referred to as munitions and explosives of concern (MEC). The environmental media at 600 Hill Waste Pit was investigated under the Army's IRP and the munitions and munitions constituents (MC) were investigated under the Army's MMRP. The key findings of these investigations are summarized in this Section and presented in more detail in **Part 2** of this ROD.

Previous investigations at the 600 Hill Waste Pit (**Table 1**) indicate that TCE is present in groundwater and surface water at concentrations above the levels of concern (LOCs) at the 600 Hill Waste Pit. The configuration of the TCE-impacted groundwater plume (approximately 28 acres) is primarily centralized along the axis of a prominent bedrock fold within the 600 Area and follows the direction of the regional groundwater flow from the source area to the southeast (**Figure 4**). TCE concentrations in groundwater have been as high as 210 micrograms per liter ( $\mu$ g/L), exceeding the LOC (1  $\mu$ g/L) between May 2005 and February 2011 southwest and downgradient of the source area of the munitions waste pit at monitoring well 13MW-2 (**Figure 5**). The TCE groundwater plume extends into the wetland areas along the northeast and southwest plume boundaries, where TCE is discharging to surface water (**Figure 6**). TCE concentrations in surface water have been detected as high as 14.0  $\mu$ g/L in a sample (11SW-3) collected October 2007 within the wetland area located at the northeast plume boundary and has been historically reported at concentrations exceeding the LOC (1  $\mu$ g/L).

The human health contaminants of potential concern (COPCs) were selected from the detected chemicals in groundwater and surface water that exceeded the appropriate LOC. These compounds were also screened using the results of the Human Health Risk Assessment (HHRA) and, where available, chemical-specific Applicable or Relevant and Appropriate Requirements

(ARARs). Based on this screening process, TCE was identified as the sole contaminant of concern (COC) for 600 Area groundwater (**Table 2**). No unacceptable human health or ecological risks were identified for exposure to 600 Area surface water, sediment, or soil.

The May 2012 trenching conducted within the source area (13TR1-1) for the 600 Hill Waste Pit reported TCE at a concentration of 23.9 milligrams per kilogram (mg/kg) in soil collected between 24 feet (ft) and 24.5 ft below ground surface (bgs), directly on top of bedrock (**Figure** 7). No constituents were reported in surface soil exceeding the LOCs and therefore surface soil is not identified as a media of concern. No HHRA was completed for sediment because the results of sediment sampling during the 1989 SI and in 2004 and 2006 identified no contaminants exceeding human health screening criteria, and therefore sediment is not a media of concern at the Site. One MEC item, a CDU-10 (T-1)/B Canister with XM39E and XM44 (Gravel Mines), and munitions debris (MD) were encountered in subsurface soil during the source area investigations at the 600 Hill Waste Pit. The one MEC item, encountered at 4.5 ft bgs, was evaluated by EOD or similarly qualified personnel and determined to be MEC, and the majority of the MD was encountered between 10 and 20 ft bgs. Additional information on site characterization is provided in **Section 2.5** of this ROD.

# 1.4 DESCRIPTION OF THE SELECTED REMEDY

The Selected Remedy for TCE-impacted groundwater and the explosive hazards associated with munitions in the surface and subsurface soil at 600 Hill Waste Pit, pursuant to this ROD, is part of a comprehensive environmental investigation and remediation process currently being performed at Picatinny. Alternative 6 was selected over other remedial alternatives evaluated, because it provides the best combination of primary balancing criteria, is protective of human health and the environment, while meeting the CERCLA threshold criteria, as detailed in the Final Feasibility Study (FS) (ECC, 2017).

The Selected Remedy is Alternative 6 – Total Munitions Waste Pit Removal, TCE Source Material Removal, Monitored Natural Attenuation (MNA) Polishing, and Land Use Controls (LUCs). Alternative 6 consists of excavation and off-site disposal of the entire 0.24-acre Munitions Waste Pit, to include the TCE-contaminated source area soil, and the sidewall cutback area extending 50 feet from the limits of the excavation area (Figure 8) and land use controls (LUCs). The description of Alternative 6, as provided in this Section, describes the implementation of the Selected Remedy to achieve the Remedial Action Objectives (RAOs) based on the available site data and as was presented in the Final approved FS (ECC, 2017). The site-specific details of the Selected Remedy will be developed and presented in a Remedial Action Work Plan during the remedial design phase. All munitions and related MD encountered will be removed within the 0.24-acre excavation area. The remaining areas in Picatinny are being considered separately, and remedies for these areas are presented in separate documents.

# 1.4.1 Munitions Waste Pit and TCE Source Material Removal

The entire 0.24-acre Munitions Waste Pit, including the TCE-impacted soil will be excavated to an estimated depth of 20 to 25 ft bgs since it is acting as a source of groundwater contamination and incidental surface water impacts. Based on the source area investigations completed at the site, the volume of the material is expected to total approximately 9,526 cubic yards (cy),

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 1-4       |

including approximately 1,334 cy of TCE-contaminated soil. In addition, an estimated 16,200 cy of clean overburden, sidewall cutback soils, and stockpiled gravel and debris will need to be excavated and staged near the Site in order to facilitate the removal of TCE-contaminated soil. The total disturbed area is estimated to be approximately 42,000 square ft (ft<sup>2</sup>), with an additional two acres needed for stockpiling, staging, and sorting munitions. During excavation of the waste pit, all material soil will be inspected for munitions and MD by qualified technicians in accordance with the inspection standards of the Department of Defense Explosives Safety Board (DDESB). It is assumed that the majority of munitions and MD will be located within the waste pit itself, at a depth of 20 to 25 ft within the disposal area, and not in the overlying or cutback material.

Following the excavation activities, post-excavation confirmatory soil samples will be collected from the sidewalls and bottom of the excavation. Confirmation sample locations will be biased toward locations and depths of the highest expected contamination, utilizing an organic vapor analyzer as a field indicator. The samples collected will be sent to an offsite laboratory for volatile organic compound (VOC) analysis. Sampling procedures outlined in the NJDEP *Technical Guidance for Site Investigation of Soil, Remedial Investigation of Soil, and Remedial Action Verification for Soil* (NJDEP, 2015) will be used for confirmation soil sampling. During the design phase, NJDEP Impact to Groundwater Guidance (NJDEP, 2008) will be used to determine the Impact to Groundwater. The details regarding post-excavation confirmatory sampling will be included in the Remedial Action Work Plan and will be submitted for review and approval by the appropriate agencies prior to initiation of remedial activities.

Post-excavation confirmatory soil samples will be collected at a frequency of every 30 ft of sidewall and every 900 ft<sup>2</sup> of the excavation bottom, which is considered representative of post-excavation conditions. Bedrock is expected to be encountered at the base of the excavation in some areas, which will reduce the number of confirmation samples collected from the bottom of excavation. The excavation will be kept open while awaiting laboratory confirmatory results. If the results of one or more of the sidewall samples exceed the site-specific Impact to Groundwater SRS, additional soil will be excavated in the direction of the exceedance, and additional confirmatory samples subsequently collected until the analytical results are below the criteria. Details regarding the confirmatory sampling will be included in the Remedial Action Work Plan.

## 1.4.2 Soil Screening and Disposal

During the soil removal phase, a Spread and Scan Method will be used to screen and sort any MEC in the soil and excavated debris. This method generally includes the following:

- a. UXO Technicians should sweep the surface and subsurface to a minimum of 6-inches prior to the first and subsequent 6-inch lifts. The UXO Technicians will then investigate all anomalies detected.
- b. Upon completion of the UXO technician sweep and removal of surface and/or subsurface anomalies, the 6-inch lift is conducted.
- c. Following the lift, the UXO technicians inspect the spoils removed during the 6-inch lift to confirm no additional MEC and/or MD has been collected in the spoils.

The cleared soil will then be removed by a loader and stockpiled for disposal. The process would repeat every six inches in depth until soil is excavated and cleared. The UXO Technicians will certify the screened soil is safe prior to being loaded into dump trucks and transported to off-site landfills (Resource Conservation and Recovery Act [RCRA] Subtitle C or D). The soil screening process will be detailed in the Remedial Action Work Plan and in the Explosives Safety Submission (ESS).

# 1.4.3 Munitions Inspection and Disposal

UXO Technicians will make every effort to identify the munitions encountered during the excavation through visual examination of items for markings and other identifying features such as shape, size, and external fittings. All MEC and MD identified at the site will be carefully cataloged and the location accurately recorded. Items will not be moved during the inspection/ identification until the nature and condition of the item can be ascertained. All MEC disposal activities will be performed in accordance with Engineer Manual-385-1-97 (USACE, 2008), in addition to Federal, State, and local regulations. All MEC will be subjected to demolition procedures, which will be conducted through blow-in-place operations or consolidated shots. If an item is safe to move, the item may be relocated for disposal due to safety concerns or to consolidate shots. Details regarding the confirmatory sampling will be included in the Remedial Action Work Plan.

# 1.4.4 Carbon Substrate Amendment Application

Following the excavation of the munitions waste pit, including the TCE-contaminated source area soil, a carbon substrate amendment will be added to the bottom of the open excavation to further enhance degradation of any residual TCE contamination within the saturated zone in the source area. The excavation will then be backfilled with clean fill from an approved off-post source, and clean overburden and sidewall cutback soil, to restore the area to the existing site contours. As was requested by NJDEP in their April 26, 2018 comment letter on the Preferred Alternative, the Army will obtain a NJDEP Discharge to Groundwater Permit-by-Rule Equivalent, through the CERCLA process documentation, such as the Remedial Action Work Plan, which will detail the discharge of the carbon substrate amendment to the groundwater within the open excavation, as required for the Selected Remedy (**Appendix A**).

# 1.4.5 Monitored Natural Attenuation Polishing

MNA of groundwater and surface water is included in the Selected Remedy as a polishing step, upon completion of the waste pit excavation and soil removal. MNA polishing will continue until the ARAR for TCE in groundwater (NJDEP Groundwater Quality Standards [GWQS] of 1  $\mu$ g/L) is achieved and the comparison criteria for surface water will be based on the New Jersey Surface Water Quality Criteria (SWQC) of 1  $\mu$ g/L for TCE. Surface water will be monitored until the groundwater achieves the cleanup goal for TCE. Although no RAOs were established for surface water, it is included in the Selected Remedy based on previous agreements reached between the USEPA and the Army regarding differing approaches to addressing contaminated groundwater and surface water at Mid-Valley Groundwater (PICA-204) (Army, 2012). In the Mid-Valley Dispute Resolution, the Army and USEPA agreed that the impact to surface water

was a secondary issue for which the Army agreed to monitor surface water as part of the remedy but did not recognize the surface water criteria as ARARs since there was no unacceptable risk from surface water (**Appendix B**). The groundwater Area of Attainment (AA) is the area throughout which the groundwater cleanup goal ( $1 \mu g/L$  for TCE) will be attained. The groundwater AA encompasses the TCE-impacted groundwater and surface water sampling area (**Figure 8**).

The MNA polishing will include the existing 20 on-site monitoring wells and the 10 surface water sampling locations (as shown in **Figures 5** and **6**). **Table 3** provides a summary of the well construction information of the on-site monitoring wells. Following the excavation, the on-site downgradient monitoring wells and surface water will be monitored. The length of time required for the groundwater and surface water monitoring may be modified once the remedy is implemented on the basis of the analytical results and in collaboration with the regulators. The MNA program will be detailed in the Remedial Action Work Plan for the 600 Hill Waste Pit and will be conducted in accordance with the NJDEP field sampling guidelines and protocol (NJDEP, 2005b).

# 1.4.6 Land Use Controls

The objective of the LUC component of the Selected Remedy is to safeguard human health. LUCs will achieve this objective by restricting access to hazards associated with munitions and to TCE in groundwater, surface water, and subsurface soil. **Figure 9** depicts the groundwater and munitions LUC boundaries. LUCs include restrictions on groundwater use and intrusive activities, and safety programs, some of which are currently in place at the 600 Hill Waste Pit and summarized in this section. LUCs also include annual inspections, as discussed in **Section 1.4.7**.

Picatinny also has internal Army measures in place as components of regular facility operations, which prevent unlimited use/unrestricted exposure (UU/UE). These internal measures include the following:

*Site Clearance/Soil Management Procedures*—Prior to all soil movement, the Picatinny Environmental Affairs Office must be notified and give approval.

*UXO Clearance Procedures*—Intrusive activities require a permit from the Picatinny Safety Office and are subject to Picatinny UXO Safety requirements. Construction support is required for any planned excavations. Identified UXO is handled in accordance with Picatinny UXO safety requirements.

*Master Plan Regulations (Army Regulation 210-20)*—Land use restrictions are memorialized in the Picatinny Arsenal Real Property Vision Plan (AECOM Joint Venture [AECOM], 2015).

*Geographic Information System (GIS) Database*—The GIS database contains a record of the Site location/boundaries, size, chemical analytical data (and screening criteria for the Site COCs), and any land use restrictions. The GIS database is used by the Environmental Affairs Office to administer procedures for site clearance and soil management.

*Base Access Restrictions (Security)*—The Base is surrounded by a fence and entrances are guarded 24 hours per day. The entire 600 Area lies entirely within the Robinson Enclosure, a secure part the Base, which has restricted access, a security system, and fence with a locked entrance gate.

*Safety Programs*—All contractors are required to attend safety training conducted by the Picatinny Safety Office.

Picatinny also has media-specific restrictions, including the base-wide New Jersey Department of Environmental Protection Classification Exception Area (CEA), which is an existing measure at Picatinny to guard against unauthorized use of groundwater. As part of the CEA, there is a Well Restriction Area (WRA), which establishes well installation and groundwater use restrictions with proper controls and authorization by the Army and NJDEP.

In addition, the Army has issued a Non-Time Critical Removal Action (NTCRA) Interim Land Use Control Plan, Picatinny Arsenal, specifically for the five MRSs, which include the Inactive Munitions Waste Pit (PICA-013-R-01) (Army, 2013). The interim Land Use Control Plan is currently in place and consists of interim measures for achieving the RAOs for explosive hazards and other risks from munitions.

The measures currently included in the NTCRA Interim LUC Plan will be incorporated into the final Selected Remedy and applied to the 21-acre Inactive Munitions Waste Pit MRS, which encompasses the 0.24-acre waste pit area (**Figure 8**). These LUCs include the following:

- Notification of intrusive activities and on-site UXO Clearance Procedures by UXO contractors for intrusive activities, per DoD 6055.09-M Volume 7.
- Safety program and UXO training prior to initiating any intrusive operations. All contractors are required to attend a safety and UXO briefing. Safety training also includes use of educational materials, such as a web-based UXO safety classes available to Arsenal personnel and UXO briefings, as applicable for site access. Educational programs will be tailored to the community needs and could include public meetings, distribution of fact sheets, exhibits, videos, and educational signage placed at the MRS (ECC, 2017; Army, 2013).

The Selected Remedy also includes the following additional LUC for vapor intrusion (VI) potential:

• Completion of an assessment for VI potential for any proposed future building construction at the Site.

The site-specific details of the VI assessments for future construction will be included in the Remedial Action Work Plan.

# 1.4.7 Land Use Control Inspections

Annual inspections are included in the Selected Remedy to ensure that LUCs remain in effect and are being properly implemented. The inspections will determine whether the fencing or

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 1-8       |

signage is uncompromised or in need of repair or replacement, whether the safety and UXO training programs are being properly implemented, and that the groundwater and surface water monitoring wells and sample areas within the AA are intact and accessible. In addition, the inspections will document whether erosion has exposed munitions to the surface (0 to 6 inches bgs). Following annual inspections and maintenance, one annual report will be completed describing the inspection results, needed maintenance or repairs, evaluation of erosion and potential migration of munitions, and assessment of the effectiveness of the administrative LUCs to prevent exposure and trespassing. The Army is responsible for implementing, maintaining, reporting on and enforcing LUCs.

# 1.5 STATUTORY DETERMINATIONS

The Selected Remedy for the 600 Hill Waste Pit site is protective of human health and the environment, complies with Federal and State requirements that are ARAR to the remedial action, is cost-effective, and uses permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable.

The Army will remain responsible for ensuring that the Selected Remedy remains protective of human health and the environment. Because the Selected Remedy will result in hazardous substances, pollutants, or contaminants remaining on the site above levels that allow for UU/UE, the Army will conduct a statutory review within five years after initiation of the response action to ensure that the Selected Remedy is, or will be, protective of human health and the environment.

The Selected Remedy satisfies the chemical-specific cleanup levels and complies with the chemical-, action and location-specific ARARs as are presented in **Tables 4** through **6** in this ROD. The Selected Remedy will also meet the comparison criteria for surface water based on the New Jersey SWQC.

# 1.5.1 Five-Year Reviews

Alternative 6 will result in hazardous substances, pollutants or contaminants remaining on-site above levels that allow for UU/UE. Therefore, statutory reviews will be conducted every five years after the initiation of the remedial action, pursuant to CERCLA §121(c) and NCP §300.430(f)(5)(iii)(C). Five-year reviews will continue as long as contaminants remain onsite at concentrations greater than levels that allow for UU/UE.

In compliance with CERCLA and the NCP, Five-Year Reviews will be conducted as part of the Selected Remedy to evaluate the implementation and performance in order to determine if the remedy continues to be protective of human health and the environment.

# 1.6 DATA CERTIFICATION CHECKLIST

The following information is included in the Part 2: Decision Summary (Section 2) of this ROD. Additional information can be found in the Administrative Record for this site.

Record of Decision for 600 Hill Waste Pit (PICA-058/Site 12 and PICA-013-R-01) Picatinny Arsenal, New Jersey Version: Final July 2019 Page 1-9

| Criterion  | Section/Table No.         | Page No.   |
|--|---------------------------|------------|
| Contaminants of concern (COCs) and their respective concentrations   | Section 2.5.2 and Table 2 | 2-6        |
| Baseline risk represented by the contaminants of concern   | Section 2.7/Table 9       | 2-13       |
| Cleanup levels established for COCs and the basis for these levels   | Section 2.7.4/Table 4     | 2-16       |
| How source materials constituting principal threats will be addressed  | Section 2.11              | 2-30       |
| Current and reasonably anticipated future land use assumptions used in baseline risk assessment and Record of Decision (ROD) | Section 2.6               | 2-12       |
| Potential land and groundwater use available as a result of the Selected Remedy  | Section 2.12.3            | 2-32       |
| Estimated capital, annual operation and maintenance (O&M) and total present worth costs, for the Selected Remedy             | Section 2.12.2            | 2-32       |
| Key factors leading to selection of Selected Remedy  | Sections 2.10 and 2.12    | 2-26, 2-31 |

NA-Not Applicable

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Record of Decision for 600 Hill Waste Pit (PICA-058/Site 12 and PICA-013-R-01) Picatinny Arsenal, New Jersey

**AUTHORIZATION SIGNATURES** 1.7

12

Isaac C. Manigault Colonel, Commander US Army Environmental Command

Sep 2019 Date

Version: Final July 2019 Page 1-11

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Version: Final July 2019 Page 1-13

19/31/19 Date

Pat Evangelista, Acting Director Superfund and Emergency Management Division United States Environmental Protection Agency, Region 2

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## 2.0 PART 2: DECISION SUMMARY

#### 2.1 SITE NAME, LOCATION AND DESCRIPTION

The 600 Hill Waste Pit, (herein referred to as the "Site") is located on the grounds of Picatinny Arsenal in Rockaway Township, Morris County, New Jersey. Picatinny is an NPL site and is registered under CERCLIS number NJ3210020704.

The installation encompasses approximately 5,900-acres and is located about 40 miles west of New York City and four miles northeast of Dover, New Jersey. The Site location within Picatinny Arsenal is presented in **Figure 1**. The Site is a combination the following two areas (as shown in **Figure 2**):

- The 600 Area Groundwater Plume (PICA-058), which covers the TCE-impacted groundwater in the vicinity of AWDF. The plume area is approximately 28 acres.
- The Inactive Munitions Waste Pit MRS (PICA-013-R-01), a 21-acre area that partially overlaps the area of the 600 Area Groundwater Plume (PICA-058) and identified as the source of the TCE-impacted groundwater in the 600 Area.

The total area of the 600 Hill Waste Pit site is approximately 44 acres (Figure 3).

# 2.2 SITE HISTORY

#### 2.2.1 Picatinny Background

The US War Department established Picatinny in 1880 as a storage and powder depot. Later, the facility was expanded to assemble powder charges for cannons and to fill projectiles with maximite (a propellant). During World War I (WWI), Picatinny produced all sizes of projectiles. In the years following WWI, Picatinny began projectile melt-loading operations and began to manufacture pyrotechnic signals and flares on a production basis. During World War II (WWII), Picatinny produced artillery ammunition, bombs, high explosives, pyrotechnics, and other ordnance. After WWII, the installation's primary role became the research and engineering of new ordnance. However, during the Korean and Vietnam conflicts, Picatinny resumed the production and development of explosives, ammunition and mine systems.

In recent years, the mission of Picatinny Arsenal has shifted to conducting and managing research development, life-cycle engineering and support of other military weapons and weapon systems. The facility has responsibility for the research and development of armament items. The Base Realignment and Closure process in 2005 resulted in Picatinny being designated to remain open and to expand in mission.

The facility houses government-operated munitions research and development facilities, operational ranges for munitions testing, residential housing, and recreational facilities that include a golf course and water park. Picatinny will continue to be used for military research and development, industrial, residential housing and recreational activities (fishing, boating, hunting and golfing) in the foreseeable future. Picatinny is not closed to the public, but access is strictly controlled. Trespassing and unauthorized activities are illegal.

# 2.2.2 600 Area Background

The 600 Hill Waste Pit is located in the 600 Area, which has been investigated extensively under both the IRP and MMRP. The 600 Area is approximately 450 acres in size and lies on the northwest boundary of Picatinny in a remote portion of the Arsenal amidst several test ranges that are currently used by the military for research and development. The 600 Area is partially enclosed within the Robinson Enclosure, and access is restricted.

As shown in **Figure 3** the 600 Area overlaps into the northeastern portion of the Area of Interest (AOI) Code 300 Area (975 acres), which is an area once used as a former artillery firing and fragmentation pattern testing area for munitions as large as 155-millimeter (mm) projectiles. The 600 Area contains approximately 100 small structures associated with explosive testing activities that take place in this portion of Picatinny. Building 660 is the currently active AWDF located near the top of Green Pond Mountain. The AWDF was constructed in 1999 and became operational in 2000 to test experimental warheads in support of Armament Research, Development and Engineering Center's (ARDEC) research and development mission.

The Army has completed various studies in the 600 Area including the RI Concept Plan for Picatinny (U.S. Army Toxic and Hazardous Materials Agency [USATHAMA], 1991), which identified three RI sites in the 600 Area (**Figure 4**), as follows:

- Site 11 Buildings 647, 649, and 650, Munitions Test Range
- Site 12 Building 656, Munitions Waste Pit
- Site 13 Building 640, Munitions/Pyrotechnics Test Area

Of these three sites identified, Site 12, the Munitions Waste Pit, identified as former investigation Area of Concern (AOC) 1 is the known source of the TCE plume (600 Hill Groundwater Plume [PICA-058]). Sites 11 and 13 are not part of the 600 Hill Waste Pit and are not discussed in this ROD. Both Site 11 and Site 13 were once part of the IRP back in the 1990s but were removed from the Program since they are ineligible as they are active ranges. The Munitions Waste Pit is approximately seven acres and is located approximately 700 ft north of the AWDF (Building 660) within the 600 Area. Previous investigations reported that steel armor plate, metal parts, and other metallic objects were disposed at Site 12 (Shaw Environmental, Inc. [Shaw], 2013). Interviews conducted of Picatinny personal during the ANL 1991 RI, reported that munitions testing was historically conducted at the Munitions Waste Pit. In 1989, Dames and Moore noted that static testing of explosives and propellants occurred at the Munitions Waste Pit (Site 12) (Dames and Moore, 1989).

Site investigations at the Munitions Waste Pit indicated that although no munitions or MD were observed, evidence of historical range activity was observed, and structures were observed such as a burn cage and gun turret (**Figure 4**). Additional investigations were recommended to determine whether munitions and/or MC-related contamination were present at the site (see **Section 2.2.3**).

Historically large amounts of blasted rock from the construction of Building 660 were deposited in the Munitions Waste Pit area beginning in the late-1990s. Based on review of aerial photographs, the more recent fill material was located immediately surrounding the burning cage

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-3       |

and to the south and west, where the drum and other debris are located (ECC, 2017). An inspection of the Site in 2005 encountered a partially buried drum and other canisters in the 1970-era filled areas, in addition to discarded light anti-tank weapon rocket tubes and 81- mm mortar shells. The maximum vertical extent of the late-1990s blasted rock fill exceeded 20 ft when it was in place. The blasted rock fill was removed between 2010 and 2011.

# 2.2.3 Site Investigations

Several investigations have been conducted within the 600 Hill Waste Pit and are listed in **Table 1**. The investigations were conducted within the 600 Area under IRP, as summarized in the 600 Area Data Report/Feasibility Study for 600 Area Groundwater Plume (Shaw, 2013), and under the MMRP as summarized in the Military Munitions Response Program Remedial Investigation for the Inactive Munitions Waste Pit MRS (PICA-013- R-01) (Weston Solutions, Inc. [WESTON], 2014). The various investigations conducted under both Army programs are summarized in **Table 1**.

## 2.2.4 Enforcement Activities

No formal enforcement activities have been conducted for the 600 Hill Waste Pit site. Picatinny is working in cooperation with the USEPA and the NJDEP to apply an appropriate remedy to the 600 Hill Waste Pit site that will preclude the necessity of formalized enforcement actions, such as Notices of Violation.

## 2.3 COMMUNITY PARTICIPATION

The site addressed in this ROD has been the topic of presentations at the Picatinny Arsenal Environmental Restoration Advisory Board (PAERAB). PAERAB members have provided comments regarding the Selected Remedy. A copy of the *Final Proposed Plan for 600 Hill Waste Pit (600 Area Groundwater Plume [PICA-058/Site 12] and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01])* (Army, 2018) was given to the PAERAB's co-chair, and a copy was offered to all PAERAB members. The Final 600 Hill Waste Pit PP was completed and released to the public on September 10, 2018 at the information repositories listed below:

**Installation Restoration Program Office** Building 319 Picatinny Arsenal, New Jersey 07806 Morris County Library 30 East Hanover Avenue Whippany, New Jersey 07981

Rockaway Township Library 61 Mount Hope Road Rockaway Township, New Jersey 07866

An electronic version of the document has also been placed on the Picatinny Environmental Restoration web page at: <u>https://www.pica.army.mil/envRestore/PublicNotice.aspx</u>

Multiple newspaper notifications were made to inform the public of the start of the PP comment period, to solicit comments from the public, and to announce the public meeting. The

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (P1CA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-4       |

notification was placed in *The Daily Record* (September 7, 2018), *The Star Ledger* (September 10, 2018) and *The Picatinny Voice* (September 14, 2018). Copies of the certificates of publication are provided in **Appendix C**. The Army held a public meeting on September 26, 2018 to inform the attendees of the remedial alternatives considered and the Preferred Alternative for the 600 Hill Waste Pit, and to seek comments on the remedy. At this meeting, representatives from the Army, NJDEP, USEPA, and the Army's contractor, ECC, were present to answer questions about the Site and the Preferred Alternative under consideration. Following the public meeting, a 30-day public comment period was held from September 26, 2018 to October 25, 2018 during which written comments were received from the public. Public comments and prepared responses from the public meeting are presented in **Section 3.0** of this ROD.

## 2.4 SCOPE AND ROLE OF SELECTED REMEDY

This ROD addresses the Selected Remedy for the TCE-impacted groundwater and the explosive hazards associated with munitions in the surface and subsurface soil at 600 Hill Waste Pit. The Selected Remedy addresses TCE in groundwater, which was identified as the COC during previous investigations conducted at the Site within the 600 Area (**Table 1**). The Selected Remedy (*Alternative 6 – Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing and LUCs*) is designed to provide protection to human health for both the current and reasonably anticipated future site uses (i.e., military/industrial and recreational) and to the environment. The COCs at the Site are discussed in detail in Section 2.7.4.

The Selected Remedy is a combination of actions that address the TCE in groundwater and surface water in the 600 Area, through the removal of the TCE-impacted soil in the source area. Confirmatory soil sampling will be completed of the limits of excavation and a carbon substrate amendment will be applied to the excavation to enhance degradation of any residual TCE-contamination in the source area, prior to back filling with clean fill material from a pre-approved location. To address the munitions with the 600 Hill Waste Pit, all munitions will be removed if encountered within the 0.24-acre Munitions Waste Pit. Soil screening will be conducted in areas where munitions and MD, or significant quantities of cultural debris (drums, vehicles, materials potentially presenting an explosives hazard, etc.) are encountered.

MNA of groundwater and surface water in the 600 Area is included in the Selected Remedy as a polishing step upon completion of the removal of the waste pit and the collocated TCE-contaminated source area soil and would continue until the TCE remediation goal for groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved. Alternative 6 includes the implementation of LUCs for groundwater use with the groundwater AA and to address the explosive hazards and the risks from munitions within the MRS, as previous detailed in **Section 1.4**.

The Selected Remedy also involves performing any site maintenance required to maintain the protectiveness. The LUCs and any maintenance that will be implemented by the Army will be detailed in the Remedial Action Work Plan. The Army is the Lead Agency for this response action and has the primary responsibility for coordinating the implementation of the Selected Remedy under CERCLA.

## 2.5 SITE CHARACTERISTICS

## 2.5.1 Physical Characteristics

## 2.5.1.1 Size, Topography and Geology/Hydrogeology

Picatinny consists of approximately 5,900 acres of improved and unimproved property. Picatinny is located in an elongated, U-shaped valley between Green Pond Mountain and Copperas Mountain to the northwest and an unnamed hill to the southeast. Most of the buildings and other facilities at Picatinny are located on the valley floor or on the slopes along the southeast side of the property. Several firing and testing ranges are located on Green Pond Mountain.

Picatinny lies within Green Pond Valley, a glaciated river valley bounded by Green Pond Mountain to the northwest and Copperas Mountain to the southeast. Elevations at Picatinny range from approximately 1,000 ft above mean sea level (msl) to 700 ft above msl at Green Pond Brook at the southern boundary. Green Pond Valley is filled with a thin layer of soil and glacially derived sediments underlain by bedrock, which is a massive-bedded pebble conglomerate and sandstone known as the Green Pond Conglomerate. The bedrock is faulted by a series of steeply dipping northeast/southwest trending faults.

The principal source of groundwater in the Green Pond Valley is the glacial deposits filling the valley floor. The low-permeability and the steep slopes of Green Pond Mountain and Copperas Mountain restrict infiltration of precipitation in these mountains. As a result, most precipitation flows overland and into the permeable valley glacial fill deposits in the valley center. The small amount of precipitation that enters Green Pond and Copperas Mountains flows down through shallow fractures to the glacial sediments in the valley. Four separate aquifers have been identified beneath Picatinny. The aquifers include an unconfined glacial aquifer, an upper semiconfined glacial aquifer, a lower semi-confined glacial aquifer and a dolomitic bedrock aquifer (Dames and Moore, 1989, 1991 and 1998). Groundwater beneath Picatinny is classified as Class IIA, which is potable water or water potable after conventional treatment.

## 2.5.1.2 Surface Water

600 Area drainage features and wetlands are shown on **Figure 6**. Upland 600 Area drainage is toward the southwest, where surface runoff is captured by a string of northeast-southwest trending wetlands, ponds and drainages. Drainage features include a small spring fed pond located at Site 11 (near Building 650) in northeast portion of the 600 Area, which discharges to a culvert under the test range and into an unnamed stream. The unnamed stream flows southwest into a 0.46-acre wetland (located near Building 647), mapped by the US Army Corps of Engineers (USACE) Water Experiment Station (WES) in 1994. This wetland also receives runoff from a portion of the AWDF (Building 660) as well as seasonal spring(s) located to the northwest of the wetland. The unnamed stream gains substantial flow volume from its origin at the pond to the discharge structure under Bear Swamp Road. This perennial stream discharges to Picatinny Lake.

A second wetland area is mapped in Site 13 (located southwest of Building 660) and receives runoff via a culvert and drainage ditch from the western portion of the AWDF. This wetland is

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-6       |

at least seasonally spring fed, since the discharge stream flows during dry weather. The Site 13 wetland area totals 2.84 acres (WES, 1994), and is mapped as part man made (1.51 acres) and red maple (1.33 acres). Discharge from the wetland is seasonal, although water is retained year-round in a small wetland pond. The wetland stream discharges to a culvert under Bear Swamp Road, and into Picatinny Lake.

# 2.5.1.3 Climate

Northern New Jersey has a continental temperate climate controlled by weather patterns from the continental interior. Prevailing winds blow from the northwest from October to April and from the southwest from May to September. The average monthly temperature ranges from a high of about 72 degrees Fahrenheit (°F) in July to a low of about 27°F in January and February. The average date of the last freeze is May 2, and the average date of the first freeze is October 8. Average annual precipitation at the Boonton monitoring station located approximately five miles east of Picatinny is 48 inches and is evenly distributed throughout the year.

# 2.5.2 Summary of Site Information

The information presented in this section is presented in more detail in the Final FS (ECC, 2017) and the other investigations and studies conducted at the 600 Hill Waste Pit, as listed in **Table 1**.

## 2.5.2.1 600 Area Groundwater Plume Source Area

As discussed, **Section 2.2.2**, the source of TCE comprising the 600 Area Groundwater Plume in bedrock is the leaching of impacted soils/fill associated with the 1970s debris disposal activity in Munitions Waste Pit (i.e., Site 12). This finding is supported by the presence of crushed drums seen in the fill material during test pit excavations (at least one of which was labeled as containing TCE), soil gas results and the detection of TCE in monitoring well 13MW-1, immediately downgradient of the 1970s fill material. After its installation in 1994, initial sampling of the AWDF well (labeled in **Figure 4**) resulted in the detection of TCE at 1.3  $\mu$ g/L. As a result, bottled water was provided for drinking and a water treatment system was installed for non-potable uses such as flushing toilets and fire suppression. The AWDF has since been connected to the base water supply system; therefore, the treatment system is no longer in use. The AWDF well is a 430 ft deep open borehole well and is retained for use only as a groundwater monitoring well.

Increases in TCE concentrations at the AWDF well were reported in 2000 (39  $\mu$ g/L), 2002 (82  $\mu$ g/L) and 2003 (110  $\mu$ g/L). However, it was unclear whether the fluctuations in the elevated TCE concentrations detected after that time (ranging from 58  $\mu$ g/L in October 2007 to 120  $\mu$ g/L in March 2007) reflect the migration of an incipient TCE plume or capture of existing side gradient plumes(s) via pumping. The wide lateral extent and depth of the current plume indicate that TCE is dispersed within the bedrock aquifer and suggest that the plume would have migrated within a broad front toward the AWDF well (ECC, 2017).

Generally, the configuration of the TCE-impacted groundwater plume (approximately 28 acres) is centralized following the surface axis of a prominent bedrock fold, which is located along the length of the 600 Area (**Figure 4**). The plume discharges into the 0.46-acre wetland area located along the northeast plume boundary (near Building 647) and the larger wetland area located

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-7       |

southwest of Building 660, as shown in **Figure 4**. The groundwater TCE plume from the source follows the direction of the regional groundwater flow from the source area to the southeast, but upon encountering the bedrock fold, which trends northeast/southwest, the plume migrates along the preferential flow pathways, following the surface axis of the bedrock fold (ECC, 2017; Shaw, 2013).

# 2.5.2.2 Source Area Investigation Findings

Several investigations have been conducted in the 600 Area to investigate the groundwater contamination, as listed in **Table 1**. A source area investigation was conducted in the Munitions Waste Pit in June 2011 and May 2012 to further investigate the source for the 600 Area TCE groundwater plume (Shaw, 2013). Four objectives were established for the source area investigation: (1) determine if an active source of TCE is present (fill earth or containers); (2) determine the thickness of the 1970s fill; (3) determine the presence or absence of contamination other than VOCs; and (4) determine the size of the TCE source area (if identified). Test pit and trenching activities were conducted during this investigation within the former testing area at the center of the Munitions Waste Pit (Shaw, 2010b).

Two 10-ft by 10-ft test pits were completed at isolated detections of TCE in site soil gas, and two additional cross trenches were planned. However, while excavating the trench (TR2) in June 2011, UXO Technicians encountered a MEC item at a depth of approximately 4.5 ft bgs (Shaw, 2013). The item, a CDU-10 (T-1)/B Canister with XM39E and XM44 (Gravel Mines), was identified as potentially explosive and excavation trenching activities ceased immediately. Numerous MD was also encountered including an expended M72 Rocket Launcher for 66-mm (light anti-tank weapon) rockets, chloroacetophenone/o-chlorobenzylidenemalononitrile (CN/CS) tear gas canisters (inert), expended 40-mm grenade cartridge cases, an exploded XM31 antitank landmine, 155-mm fragments, expended MK45 aircraft flare and expended Point Detonating (PD) fuzes (Shaw, 2013). **Figure 7** shows the locations of the one MEC item and the MD discovered during the source area investigation at the Munitions Waste Pit. The specific items encountered within the source area are listed in **Table 7**.

After completion of an Explosives Site Plan (ESP) in December 2011, the Army continued the source area investigation in May 2012, and additional trenching was completed throughout the source area (Army, 2011). Trenching continued and extended into clean native soil or top of bedrock, to a final depth of 24.5 ft bgs terminating at the bedrock interface (Shaw, 2013). During the investigation, multiple drums and significant quantities of MD were excavated from the 10-ft to 20-ft bgs interval within the source area of the Munitions Waste Pit. All of the drums were crushed, exhibited no photoionization detector (PID) response, and contained no free phase liquid. A label on one of the excavated drums clearly identified its former contents as TCE. Soil in the 20-ft to 24.5-ft bgs interval exhibited PID responses from 700 to 1,000 parts per million (ppm) total VOCs, with the highest PID reading from soil collected directly on top of bedrock. A soil sample was collected from the trench (13TR1-1) at a depth of 24-ft to 24.5 ft bgs and contained TCE at 23.9 mg/kg (**Figure 7**).

## 2.5.2.3 Summary of Environmental Media

#### Groundwater

**Figure 5** shows historical sampling locations and the constituents reported in groundwater between April 2004 and February 2011 (Shaw, 2013). A total of four VOCs and one explosive compound (research department formula X, cyclotrimethylenetrinitramine [RDX]) have historically exceeded applicable LOCs. The constituents reported were further evaluated in the HHRA. The compounds reported in groundwater at concentrations exceeding their respective LOCs are as follows:

- 1,2-Dichloroethane
- Methyl tertiary-butyl ether (MTBE)
- RDX
- 1,1,2,2-Tetrachloroethane
- TCE

As shown in **Figure 5**, the highest TCE concentrations (up to 210  $\mu$ g/L, exceeding the LOC of 1  $\mu$ g/L) were detected between June 2006 and February 2011 at well 13MW-2 located southwest and downgradient of the source area of the munitions waste pit. The next highest TCE concentrations (up to 170  $\mu$ g/L) were reported between May 2005 and May 2010 at well 13MW-1, just south of the munitions waste disposal area. The vertical extent of TCE contamination has been investigated through packer testing completed on the site wells, which indicated that the maximum TCE concentration (71.0  $\mu$ g/L) at the AWDF bedrock well is at 140 to 160 ft bgs and declines with depth to 11.0  $\mu$ g/L at 416 to 436 ft bgs (Shaw, 2013 and ECC, 2017).

RDX was detected in several groundwater samples at concentrations exceeding the NJDEP Interim GWQS (0.50  $\mu$ g/L). An additional investigation was conducted to determine the potential source of RDX within the 600 Area in 2008. The results of the RDX investigation were presented in the 600 Area RDX Investigation Data Report (Shaw, 2009), and No Further Action (NFA) was recommended. NJDEP and USEPA approved the RDX Investigation Data Report and agreed to the NFA recommendation for RDX in groundwater.

An MNA assessment of the TCE Plume was conducted during a previous investigation of the 600 Area Groundwater. As detailed in the Final FS for the 600 Hill Waste Pit, the MNA Assessment indicated evidence of degradation of TCE in the aquifer (Shaw, 2013; ECC, 2017). Overall, the groundwater results from samples collected between 2004 and 2011 in the 600 Area indicate low frequency of detections of daughter products cis-1,2-DCE, vinyl chloride, and ethane. The infrequent detection of cis-1,2-DCE and ethene in TCE-impacted wells indicates limited anaerobic degradation. The observed limited/incomplete degradation of TCE is consistent with the overall slightly reducing conditions in the aquifer (ECC, 2017). Groundwater modeling has been completed and included in the Final FS, which uses the hypothetical leaching rate of TCE to predict the length of time required for concentrations to reach the cleanup goal in groundwater through natural attenuation (ECC, 2017 [Appendix D]).

# Surface Water

600 Area drainage features and wetlands are shown on **Figure 6** and discussed in **Section 2.5.1.2**. Surface water samples have been collected from the unnamed tributary, the two wetland areas, and surface water within the 600 Area and analyzed for VOCs, RDX and MTBE. TCE was detected at one sample location (11SW-3) on multiple occasions, at concentrations ranging from 2.8  $\mu$ g/L (November 2006) to 14.0  $\mu$ g/L (October 2007). TCE was also detected in a downgradient sample at 2.2  $\mu$ g/L in 13SW-6 (January 2006). As shown in **Figure 6**, surface water data collected in January 2011 indicate the 600 Area TCE groundwater plume extends into the wetland areas adjacent to sample locations 11SW-3 (located along the northeast plume boundary) and 13SW-4 (located along the southwest plume boundary). Surface water samples collected from these locations between June 2005 and January 2011 indicate that the TCE plume is discharging to surface water in these wetland areas.

## Sediment

As shown in **Figure 6**, two sediment samples were collected during the 1989 SI (Dames and Moore, 1989) at the Munitions Waste Pit. The two samples (SD12-1 and SD-12-2) were analyzed for propellants, metals, and explosives. There were no reported exceedances in one sample (SD12-2), and mercury was reported in the other sample (SD12-1) at a concentration of 0.266 mg/kg, which is slightly above the NJDEP criteria (0.15 mg/kg) and slightly above the background value of 0.246 mg/kg for sediment (IT Corporation [IT], 2002). No other VOCs were detected at concentrations exceeding LOCs; therefore, a risk assessment was not warranted for sediment.

## Soil

As shown in **Figure 7**, four surface soil samples (0.5 to 1 ft bgs) were collected during the 1989 SI (Dames and Moore, 1989) at the Munitions Waste Pit (Site 12). The samples were analyzed for propellants, metals and explosives. Two surface soil samples (SS12-1 and SS12-2) were collected around the perimeter of the metal burn cage, used for former testing activities (**Figure** 7) and two samples (SS12-3 and SS12-4) were collected from other areas exhibiting evidence of testing activities. Nitroglycerine and other explosives were detected in three of the four surface soil samples (SS12-2, SS12-3 and SS12-4), with 2,4-dinitrotoluene and nitroglycerin reported in one sample (SS12-2) at concentrations slightly exceeding the NJDEP Non-Residential SRS. All other detections of explosives were below standards, and explosives in surface soil samples and were attributed to past activities conducted outside the metal burn cage, other testing activities, or the possible decay of metal debris present at the Site (Dames and Moore, 1989). However, all metals concentrations were below the NJDEP Non-Residential SRSs.

During the 2011 to 2012 source area investigation (Shaw, 2013), shallow subsurface soil samples were collected from the test pits (13TP-1 and 13TP-2) between 1 and 1.5 ft bgs and test trenches (13TR1-1 and 13TR2-1) between 1 and 1.5 ft bgs completed in the source area. These shallow subsurface soil samples were analyzed for VOCs as shown in **Figure 7**. Two samples 13TP-1 and 13TR2-1 were also analyzed for metals, explosives, and semivolatile organic compounds (SVOCs). Benzo(a)pyrene was detected in one test pit soil sample (13TP-1) at an estimated concentration of 0.601 J mg/kg, which at the time of the writing of the 2017 FS, slightly exceeded the NJDEP Non-Residential SRS and the USEPA Industrial Regional

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-10      |

Screening Level (RSL). However, in September 2017 the NJDEP SRS was updated from 0.2 mg/kg to 2.0 mg/kg and the USEPA RSL was updated in June 2017 from 0.21 mg/kg to 2.1 mg/kg. Therefore, the reported concentration of benzo(a)pyrene is shown on **Figure 7** only as reference for consistency with the FS, since the concentration no longer exceeds the applicable screening criteria.

Nine additional subsurface soil samples were collected during the June 2011 and May 2012 source area investigation, as shown on **Figure 7** (Shaw, 2013). All samples were analyzed for VOCs. Five samples were also analyzed for explosives, metals, and SVOCs. The results of the source area investigation within the Munitions Waste Pit boundaries are shown in **Figure 7**. TCE was reported in subsurface soil during the trenching investigation in the source area conducted in May 2012 (13TR1-1) between 24 ft and 24.5 ft bgs at a concentration of 23.9 mg/kg, which is above the NJDEP Non-Residential SRS and USEPA Industrial Soil RSL. There were no explosives detected in subsurface soils, and detected metals were at concentrations below the NJDEP Non-Residential SRS, USEPA RSLs and/or established background. Notably, as further discussed under **Section 2.7.1.1** of this ROD, although the reported concentrations of contaminants in soil at the Site did not trigger the need for a risk assessment, the TCE-impacted soil, reported between 24 ft and 24.5 ft bgs within the source area, presents a potential impact to groundwater due to the leaching through the waste pit. Therefore, contaminated soil beneath the waste pit is addressed in the Selected Remedy for this site.

# Vapor Intrusion

As part of the source area investigations within the Munitions Waste Pit, a VI investigation was conducted in the spring of 2011. VI at the AWDF Building 660 was evaluated through the collection of near-slab soil gas samples and indoor air samples to investigate the potential for VI from the TCE groundwater plume (Shaw, 2010b). "Near-slab" soil gas samples were collected in lieu of "subslab" soil gas samples, based on the review of the as-built drawings for Building 660, which indicated a minimum concrete foundation thickness of 20 inches with many areas significantly in excess of that value, as well as presence of a vapor barrier surrounding the foundation. In addition, the building foundation was constructed directly on top of bedrock, minimizing the possibility of the presence of a vapor collection area facilitating sub-slab soil gas sampling (Shaw, 2011).

VI was determined to be a potential concern at Building 660, as the building footprint (covering approximately 23,000 ft<sup>2</sup>) overlies the 600 Area TCE plume, between source area well 13MW-1 and the AWDF (Building 660) well. The potential for VI to enter into buildings was evaluated in accordance with the DoD, NJDEP and USEPA protocols (DoD, 2009; NJDEP, 2005a and USEPA, 2002). The findings of this VI investigation were summarized in the *Building 660 VI Investigation Report* (Shaw, 2011). However, since the USEPA VI Guidance was updated in 2015, (USEPA, 2015), the VI data was re-evaluated using the current criteria and was included in the Final FS (ECC, 2017). The results were as follows:

<u>Near-slab Sampling Results</u>-TCE was detected in soil gas in only one of three near-slab soil gas samples at a concentration of 17 micrograms per cubic meter (μg/m<sup>3</sup>), below both the NJDEP Non-Residential Soil Gas Screening Level (SGSL) of 27 μg/m<sup>3</sup> and the USEPA commercial Vapor Intrusion Screening Level (VISL) level of 100 μg/m<sup>3</sup>. In addition, the TCE daughter product trans-1,2-dichloroethene (DCE) was detected at a

concentration of 8  $\mu$ g/m<sup>3</sup>, below the NJDEP Non-Residential SGSL of 5,100  $\mu$ g/m<sup>3</sup>. There is no USEPA VISL value for this compound. All other detected VOCs were below both the NJDEP and USEPA VISLs.

• Indoor Air Sampling Results- Neither TCE nor its daughter products (1,2-DCE [cis] or vinyl chloride) were detected in the four indoor air samples. Low-levels of other VOCs were detected at concentrations well below the applicable screening levels (NJDEP non-residential SGSL and USEPA commercial VISL values). Benzene was detected in one sample at 3 µg/m<sup>3</sup>, exceeding both the NJDEP criteria of 2.0 µg/m<sup>3</sup> and the USEPA criteria of 1.6 µg/m<sup>3</sup>. However, benzene is not associated with the 600 Area Groundwater Plume and is considered attributable to building operations.

The potential future risks and hazard from VI of VOCs in 600 Area groundwater is within acceptable risk range and VI is not a concern at AWDF Building 660. However, it was recommended in the 2011 VI Assessment that any future construction of buildings in the 600 Area should be assessed for VI concerns (Shaw, 2011).

# 2.5.2.4 Summary of Munitions and Explosive of Concern and Munition Constituents

An SI was completed at the 600 Hill Waste Pit (as the Inactive Munitions Waste Pit MRS) under the MMRP in July 2007 (Malcom Pirnie, Inc., 2008). As shown in **Figure 2**, the Inactive Munitions Waste Pit MRS was initially a circle; however, for the SI it was separated into on-post (PICA-013- R-01) and off-post (PICA-014-R-01) portions. Additionally, other portions of the PICA-013-R-01 MRS were deemed ineligible for the MMRP due to their use as operational range areas. These factors resulted in the current MRS boundary. Although no munitions or MD were observed during the SI fieldwork, evidence of historical range activity was observed, including structures such as a burn cage and gun turret (**Figure 4**). As a result, an RI/FS was recommended at the MRS to determine whether munitions and/or MC-related contamination were present at the site. The MMRP RI for 600 Hill Waste Pit was completed between 2012 and 2013 (WESTON, 2014).

During the RI in January 2012, the Army completed digital geophysical mapping (DGM) transect surveys over the central portion of the Inactive Munitions Waste Pit MRS to detect subsurface anomalies and determine lateral and vertical extent of the waste pit (**Figure 10**). Based on a total of 6,163 linear ft of DGM transects surveys, the munitions waste pit area is estimated to extend laterally over 0.24 acres (10,498 ft<sup>2</sup>) and vertically from ground surface down to bedrock, at approximately 24.5 ft bgs. Assuming an even distribution of buried fill material, the approximate volume of the waste pit has been estimated at 9,526 cy of fill material with debris, containing at least one MEC item, a CDU-10 (T-1)/B Canister with XM39E and XM44 (Gravel Mines), and numerous MD (WESTON, 2014). Although a small portion of the AOI Code 300 Area (**Figure 3**) overlaps the MRS, no 155-mm projectiles from testing at the 300 Area were identified within the 600 Area. MD was recovered at ground surface from the portion of the MRS that overlaps with the AOI Code 300 Area only (WESTON, 2014).

Based on findings of the RI, the bulk of buried debris containing munitions is located from 10 to 20 ft bgs, although one MEC item was encountered within the Munitions Waste Pit at 4.5 ft bgs and numerous MD was encountered, as listed in **Table 7**.

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-12      |

#### **Munitions Constituents**

As discussed above, soil samples were collected and analyzed for MC-related contamination during the trenching activities as part of the source area investigation. The soil samples (IMWP-002, IMWP-003 and IMWP-004) were collected from observed areas of contamination, such as below a drum containing MD and below leaking fluids (Figure 10). As part of the MMRP RI, these analytical soil sampling results were further evaluated (WESTON, 2014) to determine if any MC-related COPCs or contaminants of potential ecological concern (COPECs) were present and warranted a quantitative risk assessment. No COPCs or COPECs were identified in soil and no quantitative risk assessment was performed.

## **DoD Military Munitions Hazards**

During the June 2011 intrusive source area investigation conducted under the Army's IRP, one MEC item, a CDU-10 (T-1)/B Canister with XM39E and XM44 (Gravel Mines), and MD were encountered at the 600 Hill Waste Pit (**Table 7**).

The bulk source for munitions and MD was encountered approximately 10 to 20 ft bgs within the waste pit. However, MD was encountered within the waste pit and one MEC item was discovered at approximately 4.5 ft bgs within the 600 Hill Waste Pit. Surface MEC exposure pathways are not anticipated to be present to human receptors, given that MEC and MD was not detected above the frost line (3 ft bgs), where environmental factors (e.g., frost) may bring subsurface munitions to the surface. Impact and/or displacement through human activities (e.g., intrusive activities) are considered the only potential factor that could expose human receptors to explosive hazards (MEC) suspected to exist within the waste pit (WESTON, 2014; ECC, 2017).

# 2.6 CURRENT AND POTENTIAL FUTURE LAND USE

The Picatinny Arsenal Real Property Vision Plan (AECOM, 2015) designates future use of the area encompassing the 600 Hill Waste Pit (Area N) consistent with its current use as a secured military and industrial operations area, where access is restricted to on-site research workers, other authorized personnel and limited recreational users (hunters). At this time, the current and foreseeable future users are considered to consist of authorized Picatinny personnel, contractors, visitors (e.g., regulatory personnel) and occasional recreational users (hunters). Unauthorized trespassers are highly unlikely, given the controlled access to the site. The 600 Hill Waste Pit is a restricted access area, as it is fully fenced by the Robinson Enclosure and abuts operational range areas to the east, west, and south. The installation boundary forms the northwestern extent of the Site.

Internal Army measures include fencing, guarded access points, warning signage for explosive hazards, pre-authorization requirements for access and escorts for visitors in the restricted area. The current access restrictions are not anticipated to change in the future, and the 600 Hill Waste Pit is not currently included in any future overall redevelopment plans for Picatinny because of its proximity to operational range areas, although plans could change in the future. Future military housing is unlikely in the 600 Area due to long-term projected range operation. Initially the preferred remedy for the 600 Hill Waste Pit was LUCs; however, upon further discussions with Picatinny leadership, Alternative 6 was selected since the Site was identified as a prime building area and it was preferred that the area remain available for use in the future.

## 2.7 SUMMARY OF SITE RISKS

This section provides a summary of the risk and hazard assessments completed for the 600 Hill Waste Pit. The estimated human health risk and hazards from 600 area groundwater, surface water, and vapor intrusion from in-situ groundwater to Building 660 are summarized in **Table 8**. An ecological risk assessment (ERA) for surface water and a MEC Hazard Assessment (HA) for the 600 Area were also completed for the 600 Hill Waste Pit and are summarized in this section.

No HHRA was conducted for sediment because the results of sediment sampling at the 600 Area identified no contaminants exceeding human health screening criteria. No HHRA was completed under the IRP investigations for soil since no COPCs were identified in the surface or subsurface soil and the TCE reported in soil (23.9 mg/kg) at 24 ft bgs did not constitute a complete exposure pathway (Shaw, 2013; ECC, 2017). Likewise, no COPCs were identified in soil under the MMRP using all available site soil data and therefore no quantitative risk assessment was performed as part of the MMRP RI (WESTON, 2014). All MC-related contamination pathways to potential receptors at the Site were determined to be incomplete.

## 2.7.1 Human Health Risks

## 2.7.1.1 Groundwater

Risks to anticipated current and future receptors (industrial research worker and construction excavation worker) were evaluated for groundwater in the HHRA. A military residential scenario was not evaluated because the 600 Area is located in a secure part of Picatinny and is restricted to on-site research workers and construction excavation workers. Future military housing is unlikely in the 600 Area due to the long-term projected range operations. The estimated cancer risks and non-cancer hazards were quantified for exposure scenarios for on-site industrial research workers and on-site construction excavation workers. It was assumed these receptors would be exposed to untreated groundwater if it were hypothetically used as a drinking water supply. For these receptors, groundwater routes of exposure evaluated included ingestion and dermal contact, inhalation of VOCs during washroom use and volatilization of constituents from in-situ groundwater to indoor air followed by inhalation. However, these exposure scenarios should be considered future scenarios, except for the inhalation of VOCs from in-situ groundwater, since no workers currently use 600 Area Groundwater.

Based on the risk assessments performed for groundwater for the current and reasonably anticipated future exposure scenarios for 600 Area, the summary of human health risks is provided in **Table 8** and are as follows:

• The estimated total reasonable maximum exposure (RME) cancer risk of 1.1E-05 for the future industrial research worker scenario is based upon the following risks associated with the three exposure pathways evaluated and totaled: 9.8E-06 for ingestion, 5.8E-07 for inhalation and 1.8E-07 for dermal contact. The estimated RME risk for the future industrial research worker is within the USEPA's cancer risk range of 1E-04 to 1E-06. The cancer risk driver was TCE in groundwater.

- The estimated total RME cancer risk is 2.2E-08 for the future construction excavation worker scenario, which is based entirely on the evaluated dermal exposure pathway and is below the USEPA's acceptable risk range.
- The estimated total RME non-cancer hazard of 0.005 for the future industrial research worker scenario and the estimated total RME non-cancer hazard of 0.0001 for the future construction excavation worker scenario are both less than the USEPA's target non-cancer hazard index (HI) of 1.

# 2.7.1.2 Surface Water

For surface water, human routes of exposure were limited to dermal contact with surface water by future industrial research workers, since surface water is not currently used by on-site workers or any other human receptor populations. Based on the risk assessments performed for surface water for the current and reasonably anticipated future exposure scenarios, the summary of human health risks are provided in **Table 8** and are as follows:

- The estimated total RME cancer risk of 1.1E-09 for the current and future industrial research worker scenario is below the USEPA's target cancer risk range of 1E-04 to 1E-06.
- The estimated total surface water RME non-cancer hazard of 0.000009 for the current and future industrial research worker scenario is below the USEPA's target non-cancer HI of 1.
- No unacceptable human health risks have been identified associated with exposure to 600 Area surface water.

# 2.7.1.3 Vapor Intrusion

As discussed in **Section 2.5.2.2** of this ROD, the future risks and hazards from VI of the VOCs in 600 Area groundwater for the future industrial research worker receptor are within the acceptable risk range, and VI is not a concern at AWDF Building 660 (Shaw, 2011 and 2013). Since the USEPA VI Guidance was updated in 2015, (USEPA, 2015), the VI data from Building 660 was re-evaluated using the current USEPA criteria and included in the Final FS (ECC, 2017), which also indicated VI is not a concern at the AWDF Building 660.

The Johnson and Ettinger VI Model (J&E Model) was used to evaluate risks and hazards from the inhalation of organics that may migrate from in-situ groundwater to indoor air at Building 660. The results of the VI potential risk evaluation are summarized in **Table 8** and are as follows:

- The estimated cancer risk from the off-gassing of organics from in-situ groundwater to indoor air for the current and future industrial research worker of 6.3E-06 is within the USEPA's target cancer risk range of 1E-04 to 1E-06.
- The estimated non-cancer hazard of 0.002 is below the USEPA's target HI of 1.
- No unacceptable human health risks have been identified associated with VI exposure at Building 660. However, the 2011 VI Assessment recommended that any future building construction within the 600 Area should be assessed for VI concerns.

#### 2.7.2 Ecological Risk

Ecological concerns for surface water were assessed using the surface water data collected at the Site between November 2004 and January 2011 (Shaw, 2013). Results were compared to the ecological screening criteria derived in the Phase II (ERA (IT, 2000) and in the Phase III Screening Level Ecological Risk Assessment (SLERA) (Shaw, 2005b). These screening values were compared to concentrations of COPECs in surface water to determine if there is any potential for an ecological impact. The risk to aquatic receptors (e.g., fish and macroinvertebrates), which may be exposed to COPECs from groundwater discharging into flowages via seeps or springs, was evaluated (Shaw, 2013). The chemicals reported in the surface water at concentrations exceeding their respective screening criteria included RDX, MTBE and TCE.

The ERA results indicated that the reported concentrations of contaminants, both within and downstream of the 600 Area, as well as in the groundwater-to-surface water discharge areas, were all below the screening values and are not expected to pose any adverse effects on aquatic life (Shaw, 2013 [Appendix M]).

#### 2.7.3 Munitions and Explosives of Concern Hazards

As part of the MMRP RI, the Army completed a MEC HA to evaluate the explosive hazards associated with conventional munitions at the MRS (WESTON, 2014). The MEC HA was completed for the 600 Hill Waste Pit in accordance with the Interim MEC HA Methodology (USEPA, 2008). As discussed in **Section 2.5**, one MEC item, a CDU-10 (T-1)/B Canister with XM39E and XM44 (Gravel Mines), was discovered in the subsurface of the 600 Hill Waste Pit during the June 2011 intrusive source area investigation, along with numerous MD.

As discussed in **Section 2.6**, the human receptors on the MRS include authorized Picatinny personnel, contractors, visitors (e.g., regulatory personnel) and recreational users. The MRS is in a restricted access area (fully fenced) within Picatinny that abuts operational ranges to the east and south and the installation boundary to the northwest. Therefore, site accessibility was rated as "limited" in the MEC HA scoring. The current access restrictions are not anticipated to change in the future. Potential contact hours are estimated to be between 10,000 and 99,999 receptor hours per year, and the migration potential was rated as unlikely (ECC, 2017). Based on these and other factors, the baseline MEC HA resulted in a hazard level of 3 (with a total score of 560) for the MRS, which is a moderate potential explosive hazard condition, as shown in the Table below:

| Hazard Level | Maximum/Minimum<br>MEC HA Score | Description                                   |
|--------------|---------------------------------|---|
| 1            | 1000/840                        | Highest potential explosive hazard condition  |
| 2            | 835/725                         | High potential explosive hazard condition     |
| 3            | 720/530                         | Moderate potential explosive hazard condition |
| 4            | 535/125                         | Low potential explosive hazard condition      |

Summary of the MEC HA Hazard Levels

Source: USEPA, 2008.

# 2.7.4 Basis for Taking Action

The Selected Remedy presented in this ROD for the 600 Hill Waste Pit, *Alternative 6 – Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing and LUCs* is necessary to protect the public health or welfare from actual or threatened releases of hazardous substances into the environment. Specifically, the presence of TCE in the groundwater and potential presence of MEC warrant further action based on the potential risks to current and future human receptors.

In July 2009, a resolution was reached between USEPA and the Army regarding the Selected Remedy for the Mid-Valley Groundwater. The Mid-Valley Dispute Agreement (**Appendix B**) involved the recognition of USEPA policy of returning groundwater to its beneficial use, where the Army agreed to recognize promulgated groundwater criteria as the ARAR even when sites have excess risk levels less than 1E-4 for exposure to groundwater. Surface water was considered a secondary issue, whereby the Army agreed to monitor surface water but not recognize surface water criteria as ARARs without an unacceptable risk. Based on the July 2009 Mid-Valley Groundwater, and the agreed upon approach was applied to the Selected Remedy for the 600 Hill Waste Pit (Army, 2012; Shaw, 2013).

The information supporting the decisions on the Selected Remedy is contained in the administrative record file for the site.

# 2.8 REMEDIAL ACTION OBJECTIVES

RAOs are site-specific cleanup objectives that are established based on the nature and extent of contamination, potential for human and environmental exposure, and ARARs. RAOs specify the item/COCs, media of concern, exposure routes and receptors and an acceptable contaminant level or range of levels for each exposure route. The COC for the 600 Hill Waste Pit is TCE in groundwater. However, as detailed in **Section 2.7.1**, estimated cancer risks calculated in the HHRA for the future industrial research worker and the future construction excavation worker are below the USEPA's acceptable risk range. In addition, the estimated non-cancer hazards for both receptors are both less than the USEPA's target non-cancer HI of 1. Although there were no unacceptable human health or ecological risks identified for either groundwater or surface water, both medium are addressed in the Selected Remedy via MNA of groundwater and surface water as a polishing step, upon completion of the removal of the waste pit and the collocated TCE-contaminated source area soil. The evaluation of ARARs identified the most stringent cleanup level for TCE in groundwater is the NJDEP GWQS (1.0  $\mu$ g/L), which is geared toward restoring groundwater to its beneficial use as a drinking water source.

The RAOs were developed based on criteria outlined in Section 300.430(e)(2) of the NCP and Section 121 of CERCLA. The following RAOs were developed for the 600 Hill Waste Pit to address both the TCE-impacted groundwater and the potential explosive hazards related to the occurrence of munitions at the site:

 Prevent exposure to TCE-contaminated groundwater (TCE greater than 1 µg/L) via ingestion, dermal contact or inhalation, that would cause unacceptable risk (greater than 1E-04) over the duration of the response action.

- Achieve the TCE New Jersey GWQS to restore groundwater to meet the GWQS cleanup goal for TCE (1 µg/L) in a reasonable timeframe (less than 50 years), thereby restoring groundwater to its beneficial use as a drinking water source. This estimated reasonable cleanup timeframe is site-specific and not applicable to other groundwater remediation projects.
- Prevent Picatinny personnel (military and civilian), contractors, visitors and recreational hunters from contact with munitions potentially present in the surface soil (0 to 6 inches bgs) and subsurface soil (greater than 6 inches bgs).

The RAO developed for munitions is based on the finding of the one MEC item, a CDU-10 (T-1)/B Canister with XM39E and XM44 (Gravel Mines), within subsurface soil; no munitions were found in the surface soil. The RAO is, however, protective of the both surface and subsurface soil exposure pathways through the implementation of LUCs.

## 2.9 DESCRIPTION OF REMEDIAL ALTERNATIVES

This ROD provides a summary of the RAs that were considered for the 600 Hill Waste Pit in the FS conducted for the Site (ECC, 2017) in accordance with the CERCLA process.

The Army assembled the following alternatives to satisfy the RAOs:

- Alternative 1 No Action
- Alternative 2 MNA, and LUCs
- Alternative 3 In-Situ Chemical Oxidation (ISCO), MNA Polishing and LUCs
- Alternative 4 In-Situ Enhanced Anaerobic Bioremediation, MNA Polishing, and LUCs
- Alternative 5 TCE Source Material Removal, MNA Polishing, and LUCs,
- Alternative 6 Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing, and LUCs
- Alternative 7 Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing, LUCs, and MEC Clearance of Entire MRS.

In accordance with Section 300.430(e) of the NCP, nine CERCLA criteria were used to evaluate the different Remedial Alternatives, as presented in the Final FS (ECC, 2017). The seven Remedial Alternatives evaluated in the Final FS are described below with their respective estimated capital costs, estimated cost for operation and maintenance (O&M) activities, and an estimate of the present worth costs for the each of the RAs. For the cost evaluation presented in the Final FS, a discount rate of 3.5 % was used to estimate the present value of the alternative costs. The selected remedy is *Alternative* 6 - Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing and LUCs.

The estimated costs for each of the Remedial Alternatives evaluated for 600 Hill Waste Pit are presented in **Table 9**. A cost comparison summary for each alternative evaluated in the FS is provided in **Appendix D** of this ROD.

#### 2.9.1 Alternative 1 – No Action

## Estimated Capital Cost: \$0 Estimated O&M Cost Discounted Over 30 Years: \$0 Estimated Present Worth Cost: \$0

CERCLA and the NCP require that a No Action alternative be evaluated at every site to establish a baseline for comparison of other remedial alternatives. Under Alternative 1, no efforts would be undertaken to contain, remove, monitor or treat the TCE-contaminated groundwater or remove munitions contained within the Inactive Munitions Waste Pit MRS or potential hazards from munitions encountered within the remaining portions of the MRS. In addition, the LUCs implemented at the MRS as part of the *Non-Time Critical Removal Action Land Use Control Plan* (Army, 2013) would be allowed to expire. According to the NCP, the level of treatment achieved must be compared to the required expenditures of time and materials as an integral portion of the remedy selection process. The No Action alternative is intended to serve as a baseline by which to compare the risk reduction effectiveness of other potential alternatives. In this alternative, no remedial actions will be performed, and the Site will essentially be left as is with no additional actions taken. The MEC HA score associated with the implementation of Alternative 1 is 560, (no change from baseline) indicating a moderate explosive hazard with a hazard level of 3 since no action is included to address the hazards related to munitions (ECC, 2017 [Appendix E]).

## 2.9.2 Alternative 2 – MNA and LUCs

## Estimated Capital Costs: \$71,600 Estimated O&M Cost Discounted Over 30 Years: \$602,905 Estimated Present Worth Cost: \$674,505

Alternative 2 includes the following components:

- MNA, including groundwater and surface water sampling and the assessment of contaminant trends.
- LUCs, including groundwater and land use restrictions, safety program, annual inspections and assessment for VI potential during future building construction.
- Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosives safety.

Alternative 2 includes use of MNA to clean up groundwater and surface water within the 600 Area, and the continuous implementation of LUCs to prevent exposure to groundwater and munitions hazards. Note that the MNA program and groundwater LUCs detailed for Alternative 2 would be included in Alternative 3 through 7, which are presented in this Section. The groundwater AA, which is the area throughout which the groundwater cleanup goal (1  $\mu$ g/L) will be attained, would include the area of the TCE-impacted groundwater plume. MNA would continue until the TCE ARAR for groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved. LUCs related to groundwater use would be implemented within the groundwater AA boundary and

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-19      |

LUCs would be implemented within the MRS portion of the Site to achieve the munitionsrelated RAO (Figure 9).

Alternative 2 would include implementation of LUCs, in particular, notification of groundwater standards' exceedances and potential restrictions on well installations through the base-wide CEA/WRA, restrictions on intrusive activities, access control, fencing and signage requirements, safety programs, on-site Construction Support for intrusive activities, per DoD 6055.09-M Volume 7 and assessment for VI potential during future building construction. Warning signs are required to prohibit entrance to unauthorized personnel, warn of potential MEC hazards, and provide a telephone number to contact if potential MEC are observed. Existing signage and fencing (both the Garrison fencing and Robinson Enclosure) are considered adequate to prevent unauthorized access. The LUC areas for both groundwater and the MRS portion of the Site are shown in Figure 9. Annual inspections are included to ensure that LUCs remain in effect and are being properly implemented. The inspections will determine that the fencing or signage is uncompromised or in need of repair or replacement, and that erosion has not exposed munitions or that migration of munitions to the surface (0 to 6 inches bgs) has not occurred within the MRS. Any breaks in the fence will need to be repaired quickly to prevent unauthorized entry. Following annual inspections and maintenance, one annual report will be completed describing the inspection results, needed maintenance or repairs, evaluation of erosion and potential migration of MEC, and assessment of the effectiveness of the administrative LUCs to prevent exposure and trespassing. The LUCs and any maintenance that would be implemented by the Army would be detailed in the Remedial Action Work Plan. Five-Year Reviews would be conducted no less than every five years after initiation of the remedial action to evaluate the remedy implementation and performance in order to determine if the remedy continues to be protective of human health and the environment.

The MEC HA Hazard Level associated with the implementation of Alternative 2 is 3. The MEC HA score would remain at 560 (no change from baseline) since Site access is currently restricted. This score indicates a moderate hazard potential with a hazard level of 3 since no munitions clearance is included (ECC, 2017 [Appendix E]).

## 2.9.3 Alternative 3 – ISCO, MNA Polishing and LUCs

#### Estimated Capital Cost: \$451,412 Estimated O&M Cost Discounted Over 30 Years: \$1,018,902 Estimated Present Worth Cost: \$1,470,313

Alternative 3 includes the following components:

- In situ treatment using chemical oxidants to reduce TCE concentrations in groundwater.
- MNA, including groundwater and surface water sampling, and assessment of contaminant trends.
- LUCs, including groundwater and land use restrictions, safety training, annual inspections and assessment for VI potential during future building construction.
- Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosives safety.

Alternative 3 includes in-situ treatment using chemical oxidants to reduce TCE concentrations in groundwater, followed by MNA of groundwater and surface water in the 600 Area as a polishing step after active remediation has reduced TCE contamination concentrations (**Figure 11**), as described in Alternative 2. This alternative would involve up to three injections (1 injection per year for a 3-year period) of a chemical oxidizer in six wells (three upgradient of the source area of the plume and three downgradient) for the in-situ treatment of TCE concentrations in groundwater, thereby decreasing contaminant discharge into downgradient well and wetland receptors.

Performance monitoring would be conducted at source injection wells and upgradient monitoring wells to evaluate the effectiveness of the remedy. Active treatment in the form of ISCO would be conducted over a three-year period, followed by MNA polishing for the remainder of the TCE-contaminated groundwater within the AA. MNA would continue until the TCE remediation goal for groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved. Alternative 3 would include implementation of LUCs, as specified for Alternative 2. LUCs will involve performing any site maintenance required to maintain the protectiveness of the remedy. The LUCs and any maintenance that would be implemented by the Army would be detailed in the Remedial Action Work Plan. Five-Year Reviews would be conducted no less than every five years after initiation of the remedial action to evaluate the remedy implementation and performance in order to determine if the remedy continues to be protective of human health and the environment.

The MEC HA Hazard Level associated with the implementation of Alternative 3 is 3. The MEC HA score will remain at 560 (no change from baseline), indicating a moderate hazard potential with a hazard level of 3 because no munition clearance is included (ECC, 2017 [Appendix E]).

# 2.9.4 Alternative 4 – In-Situ Enhanced Anaerobic Bioremediation, MNA Polishing and LUCs

## Estimated Capital Cost: \$622,326 Estimated O&M Cost Discounted Over 30 Years: \$985,682 Estimated Present Worth Cost: \$1,608,008

Alternative 4 includes the following components:

- In situ treatment using carbon substrate amendment<sup>1</sup> to reduce TCE concentrations in groundwater;
- MNA, including groundwater and surface water sampling and assessment of contaminant trends.
- LUCs, including groundwater and land use restrictions, safety training, annual inspections and assessment for VI potential during future building construction.

<sup>&</sup>lt;sup>1</sup> Note that the term carbon substrate indicates a generic type of amendment that is a carbon source (electron donor), which is injected into the groundwater to enhance bioremediation through reductive dechlorination of the TCE. The carbon substrate can be emulsified vegetable oil (EVO), molasses, or other carbon source. The type of carbon substrate would be identified during the design phase if this Alternative was selected.

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-21      |

• Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosives safety.

Alternative 4 includes in-situ treatment using carbon substrate to reduce TCE concentrations in groundwater, followed by MNA polishing of groundwater and surface water in the 600 Area for the remainder of the TCE (**Figure 12**). This alternative would involve up to two applications of an organic carbon substrate amendment into the soil above the source area of the plume for the in-situ treatment of TCE-contaminated soil, which is the source of the groundwater contamination. Sufficient quantities of carbon substrate would be injected to saturate the vadose zone soils and fractured bedrock down to the water table. A second application of the carbon substrate would be included in the remedy as a contingency, depending on the contaminant trend and results of the performance groundwater monitoring. The organic carbon solution would be introduced into the source area through an infiltration gallery, which would be the same size as the source of water to trickle over the infiltration gallery and further distribute the amendment through the vadose and saturated zones, after the initial amendment application in the source area.

Performance monitoring would be conducted at source area wells and select downgradient wells to evaluate the effectiveness of the remedy, and a source area bedrock well would be installed and included in the performance monitoring. After active treatment is complete, MNA polishing for the remainder of the TCE-contaminated groundwater would be performed within the AA. MNA would continue until the TCE remediation goal for groundwater (NJDEP GWQS 1 µg/L) is achieved. Alternative 4 would include implementation of LUCs, as specified for Alternative 2. LUCs would involve performing any site maintenance required to maintain the protectiveness of the remedy. The LUCs and any maintenance that would be implemented by the Army would be detailed in the Remedial Action Work Plan. Five-Year Reviews would be conducted no less than every five years after initiation of the remedial action to evaluate the remedy implementation and performance in order to determine if the remedy continues to be protective of human health and the environment.

The MEC HA Hazard Level associated with the implementation of Alternative 4 is 3. The MEC HA score would remain at 560 (no change from baseline), indicating a moderate hazard potential with a hazard level of 3 since there is no munitions clearance is included (ECC, 2017 [Appendix E]).

## 2.9.5 Alternative 5 – TCE Source Material Removal, MNA Polishing and LUCs

#### Estimated Capital Cost: \$1,525,182 Estimated O&M Cost Discounted Over 30 Years: \$602,129 Estimated Present Worth Cost: \$2,127,311

Alternative 5 includes the following components:

• Excavation and off-site disposal of TCE-contaminated soil, carbon substrate amendment<sup>1</sup> and removal of MEC located within the limits of the excavation;

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-22      |

- MNA, including groundwater and surface water sampling and an assessment of contaminant trends;
- LUCs, including groundwater and land use restrictions, safety training, annual inspections and assessment for VI potential during future building construction.
- Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosive safety.

Alternative 5 includes excavation and off-site disposal of TCE-contaminated soil, carbon substrate application, and removal of munitions located within the limits of the source area (TCE-impacted soil) excavation (**Figure 13**). The area of excavation would be approximately 200 ft by 160 ft to include the sidewall cutback area extended from the source area excavation (120 ft by 60 ft), as shown in **Figure 13**. This alternative entails excavation of TCE-contaminated soil, which is estimated at approximately 1,334 cy. In addition, an estimated 5,334 cy of clean overburden and 11,539 cy of sidewall cutback soils will need to be excavated and staged near the Site in order to facilitate excavation of TCE-contaminated soil. The clean overburden volume was based on the same area estimate of 120 ft by 60 ft, with a 20-ft thickness (ECC, 2017).

This alternative would involve removal of munitions and MD that is encountered within the TCE-contaminated soil excavation. During the excavation, a UXO-qualified team would provide construction support. Soil screening would be conducted for material where munitions and MD, or significant quantities of cultural debris (drums, vehicles, materials potentially presenting an explosives hazard, etc.) are encountered. This alternative would include confirmatory soil sampling of the limits of excavation followed by backfilling with clean fill to restore existing site contours. During the design phase, NJDEP Impact to Groundwater Guidance (NJDEP, 2008) would be used to determine the Impact to Groundwater SRS to be used as the cleanup criteria during soil excavation for the protection of groundwater. The details regarding post-excavation confirmatory sampling would be included in the Remedial Action Work Plan and would be submitted for review and approval by the appropriate agencies prior to initiation of remedial activities. Following the excavation of collocated MEC/MD and TCE-contaminated source soil, a carbon substrate amendment (estimated at 3,500 gallons) would be added to the excavation to enhance degradation of any residual contamination in the source area. Subsequently, the excavation will be backfilled with clean fill to restore existing site contours.

MNA of groundwater and surface water in the 600 Area is included in this alternative as a polishing step upon completion of the source material removal and would continue until the TCE remediation goal for groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved. Alternative 5 would include implementation of LUCs, as specified for Alternative 2. LUCs would involve performing any site maintenance required to maintain the protectiveness of the remedy. The LUCs and any maintenance that would be implemented by the Army would be detailed in the Remedial Action Work Plan. Five-Year Reviews would be conducted no less than every five years after initiation of the remedial action to evaluate the remedy implementation and performance in order to determine if the remedy continues to be protective of human health and the environment.

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (P1CA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-23      |

The MEC HA Hazard Level associated with implementation of Alternative 5 is 4 (a lower hazard than baseline). The MEC HA score would be at 365, a low hazard potential with a hazard level of 4. This alternative would have the lowest MEC HA score and would achieve the lowest MEC hazard potential due to the partial removal of subsurface MEC at the TCE source area only, combined with LUCs.

## 2.9.6 Alternative 6 – Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing and LUCs

#### Estimated Capital Cost: \$2,708,303 Estimated O&M Cost Discounted Over 30 Years: \$602,128 Estimated Present Worth Cost: \$3,310,431

Alternative 6 is the Selected Remedy for the 600 Hill Waste Pit and includes the following components:

- Excavation and off-site disposal of the Munitions Waste Pit, including the TCEcontaminated soil, carbon substrate amendment<sup>2</sup> and MEC removal within the entire 0.24-acre Munitions Waste Pit;
- MNA, including groundwater and surface water sampling and an assessment of contaminant trends;
- LUCs, including groundwater and land use restrictions, safety training, annual inspections and assessment for VI potential during future building construction.
- Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosives safety.

Alternative 6 includes excavation and off-site disposal of the entire 0.24-acre Munitions Waste Pit (approximately 9,526 cy of material), including the TCE-contaminated soil (estimated at approximately 1,334 cy), and the sidewall cutback area extending from the Munitions Waste Pit (as shown in **Figure 8**). In addition, an estimated 16,200 cy of clean overburden, sidewall cutback soils and stockpiled gravel and debris will need to be excavated and staged near the Site in order to facilitate excavation of TCE-contaminated soil. During excavation, all soil would be assessed for MEC. It is assumed that the majority of MEC items would be located within the waste pit itself at a depth of 20 to 25 ft and not in the cutback material. Assuming MEC and other MD will account for approximately 30 percent (%) of the Munitions Waste Pit volume, approximately 2,857 cy of MEC and other debris are anticipated at the site. If encountered, all munitions and MD will be removed within the 0.24-acre munitions waste pit area. Munitions and MD may remain in the uncleared areas of the MRS portion of the Site area (20.76 acres). During the excavation, a UXO-qualified team will provide construction support. Soil screening will be conducted for material where munitions and MD, or significant quantities of cultural

 $<sup>^2</sup>$  Note that the term carbon substrate indicates a generic type of amendment that is a carbon source (electron donor), which is injected into the groundwater to enhance bioremediation through reductive dechlorination of the TCE. The carbon substrate can be EVO, molasses, or other carbon source. The type of carbon substrate will be identified during the design phase for Alternative 6, which is the Selected Remedy for 600 Hill Waste Pit.

debris (drums, vehicles, materials potentially presenting an explosives hazard, etc.) are encountered.

This alternative includes confirmatory soil sampling of the limits of excavation and the application of carbon substrate to the excavation to enhance degradation of any residual TCE-contamination in the source area. The excavation will then be backfilled with clean fill from a designated pre-approved location to restore the Site to the existing conditions. During the design phase, NJDEP Impact to Groundwater Guidance (NJDEP, 2008) will be used to determine the Impact to Groundwater SRS to be used as the cleanup criteria during soil excavation for the protection of groundwater. The details regarding post-excavation confirmatory sampling will be included in the Remedial Action Work Plan and will be submitted for review and approval by the appropriate agencies prior to initiation of remedial activities.

MNA of groundwater and surface water in the 600 Area is included in this alternative as a polishing step upon completion of the removal of the munitions waste pit and TCE-contaminated soil and will continue until the remediation goal for TCE in groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved. Surface water within the 600 Area will be monitored throughout the duration of groundwater monitoring as part of the MNA polishing component of the remedy until the groundwater cleanup goal for TCE (1  $\mu$ g/L) is achieved.

Alternative 6 will include implementation of LUCs, as specified for Alternative 2. LUCs will involve performing any site maintenance required to maintain the protectiveness of the remedy. The LUCs and any maintenance that will be implemented by the Army will be detailed in the Remedial Action Work Plan. Five-Year Reviews will be conducted no less than every five years after initiation of the remedial action to evaluate the remedy implementation and performance in order to determine if the remedy continues to be protective of human health and the environment.

The MEC HA Hazard Level associated with the implementation of Alternative 6 is 4 (lower hazard than baseline). The MEC HA score is 365, indicating a low hazard potential (ECC, 2017 [Appendix E]). This alternative has the lowest score and achieves the lowest hazard potential since it includes the clearance of subsurface munitions within the 0.24-acre munitions waste pit down to the bedrock. Notably, the MEC HA score for Alternative 6 is the same as that for Alternative 5 since they both partially mitigate the hazards associated with MEC, as the entire Inactive Munitions Waste Pit MRS would not be addressed and LUCs would be implemented to reduce the hazards associated with the presence of MEC.

## 2.9.7 Alternative 7 – Total Munitions Waste Pit Removal, TCE Source Material Removal, MNA Polishing, LUCs and Removal of DoD Military Munitions within the Entire MRS

Estimated Capital Cost: \$3,787,256 Estimated O&M Cost Discounted Over 30 Years: \$332,124 Estimated Present Worth Cost: \$4,119,380

Alternative 7 includes the following components:

- Excavation and off-site disposal of TCE-contaminated soil, and MEC removal within the 0.24-acre Munitions Waste Pit.
- Surface and subsurface (up to 2 ft bgs) MEC removal from the entire MRS.
- MNA, including groundwater and surface water sampling and an assessment of contaminant trends.
- LUCs, including access control, groundwater and land use restrictions, fencing and signage, safety training and annual inspections and assessment for VI potential during future building construction.
- Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosive safety.

Alternative 7 includes excavation and off-site disposal of the entire 0.24-acre Munitions Waste Pit, including the transport and disposal of approximately 1,334 cy of TCE-contaminated soil, and the sidewall cutback area extending from the waste pit. If encountered, all munitions and MD would be removed within the limits of the 0.24-acre munitions waste pit area. Additionally, this alternative includes surface and subsurface clearance (to an average depth of 2 ft bgs) and removal of munitions in the remaining 20.76-acre Inactive Munitions Waste Pit MRS portion of the Site (**Figure 14**). However, anomalies would be removed to depth and may be discovered to extend deeper than 2 ft bgs in some areas.

This alternative would include confirmatory soil sampling of the limits of excavation followed by backfilling with clean fill to restore existing site contours. During the design phase, NJDEP Impact to Groundwater Guidance (NJDEP, 2008) would be used to determine the Impact to Groundwater SRS to be used as the cleanup criteria during soil excavation for the protection of groundwater. The details regarding post-excavation confirmatory sampling would be included in the Remedial Action Work Plan and would be submitted for review and approval by the appropriate agencies prior to initiation of remedial activities.

MNA of groundwater and surface water in the 600 Area is included in this alternative as a polishing step upon completion of the removal of the waste pit and the TCE-contaminated soil and would continue until the remediation goal for TCE in groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved.

Alternative 7 would include implementation of temporary LUCs for groundwater until the TCE groundwater remediation goal for TCE (1  $\mu$ g/L) is achieved. Alternative 7 would involve continuous implementation of LUCs, in particular, restrictions on groundwater use. The long-term groundwater monitoring program for this area would be used to determine whether subsequent actions were required and determine if MNA is progressing as anticipated following completion of the source remediation, if it is required. The MNA, LUCs, and CERCLA Five-Year Review components of this alternative are presented under Alternative 2. Because the entire MRS would be cleared of MEC to a level where the risk of encountering MEC is negligible, MEC-related LUCs would be included for ten years. Five-Year Reviews would be required as part of Alternative 7 to document the remedy's protectiveness for both groundwater and the explosive hazards at the Site. For groundwater, Five-Year Reviews are required until the remediation goal for TCE (1  $\mu$ g/L) is achieved. Additionally, Five-Year Reviews would be

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-26      |

proposed for only two review periods to document that the remedy remains protective with regard to the explosive hazards. After the two five-year periods, the need for construction support, or LUCs associated with limiting exposure to MEC hazards, would be evaluated and would no longer be required. Implementation of Alternative 7 would achieve the UU/UE after a minimum of ten years, and once the TCE remediation goal in groundwater is achieved.

Alternative 7 would provide long-term effectiveness and permanence related to MEC explosive hazards because the MEC within the MRS would be removed. The MEC HA Hazard Level associated with the implementation of Alternative 7 is 4. The MEC HA score would be 430, indicating a low hazard potential with a hazard level of 4 (ECC, 2017 [Appendix E]). This alternative would achieve the lowest hazard potential. The Hazard Level for Alternative 7 is the same as for Alternatives 5 and 6, but the score is slightly higher, as long-term LUCs are not included in Alternative 7.

# 2.10 COMPARATIVE ANALYSIS OF REMEDIAL ALTERNATIVES

This section summarizes the comparative analysis of the expected performance of each remedial alternative to identify the respective advantages and disadvantages of each remedy, as was presented in detail in Section 7.2.2 of the Final FS. In accordance with Section 300.430(e) of the NCP, nine CERCLA criteria were used to evaluate the different Remedial Alternatives considered for the site (ECC, 2017). The nine CERCLA criteria are as follows:

- 1) Protection of human health and environment is used to determine whether an alternative eliminates, reduces, or controls threats to public health and the environment through LUCs, engineering controls, or treatment.
- 2) Compliance with ARARs is used to evaluate whether the alternative meets Federal and State environmental statutes, regulations, and other requirements that pertain to the site(s), or whether a waiver is justified.
- 3) Long-term effectiveness and permanence is used to consider the ability of an alternative to maintain protection of human health and the environment over time.
- 4) Reduction of toxicity, mobility, or volume through treatment is used to evaluate an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.
- 5) Short-term effectiveness is used to consider the length of time needed to implement an alternative and the risks the alternative poses to workers, residents, and the environment during implementation.
- 6) Implementability is used to consider the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.
- 7) Cost is used to evaluate the estimated capital and O&M costs, as well present-worth costs for the alternatives considered.
- 8) State acceptance is used to consider whether the State agrees with the analyses and recommendations and to assess that the State's key concerns related to the preferred alternative are addressed.

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-27      |

9) Community acceptance is used to consider whether the local community agrees with the analyses and the preferred alternative as presented in the Proposed Plan.

The nine CERCLA evaluation criteria are divided into threshold criteria, primary balancing criteria and modifying criteria. An overview of the comparative analysis of threshold and balancing criteria is provided in **Table 9**.

#### 2.10.1 Threshold Criteria

These criteria are standards that an alternative must meet to be eligible for the Selected Remedy. There is little flexibility in meeting the threshold criteria, whereas the alternative must meet the criteria or it is unacceptable.

- 1. Overall protection of human health and the environment
- 2. Compliance with ARARs

#### 2.10.1.1 Protection of Human Health and the Environment

All alternatives except for Alternative 1 – No Action provide protection of human health and the environment. Alternative 2 provides an adequate protection of the human health and the environment through the implementation of LUCs and groundwater controls, primarily through groundwater use restrictions. Alternatives 2 through 7 meet this threshold criterion because they provide protection to human health and the environment through a combination of treatment or removal and LUCs. Alternatives 3 and 4 provide an active remedy to reduce TCE groundwater concentrations in the source area and over time, reduce TCE concentrations in the downgradient plume and receptor areas, and by the groundwater LUC. Alternatives 3 and 4 provide protection to human health for the potential explosive hazards related to MEC through the implementation of LUCs and by requiring construction support. Alternatives 5 through 7 provide an adequate protection from TCE-impacted groundwater and explosive hazards related to munitions through the implementation of groundwater LUCs, construction support, and through clearance of munitions within the entire Inactive Munitions Waste Pit MRS included in Alternative 7.

#### 2.10.1.2 Compliance with Applicable or Relevant and Appropriate Requirements

All alternatives except for Alternative 1 – No Action, will achieve the ARARs. Alternatives 2 through 7 will meet the chemical-specific ARARs for groundwater contaminants at the end of the remedial action, when contaminants levels fall below the NJDEP GWQS ( $1\mu g/L$ ), the most stringent groundwater ARAR, and will comply with all location- and action-specific ARARs.

## 2.10.2 Primary Balancing Criteria

These criteria weigh the tradeoffs between alternatives and represent the standards upon which the detailed evaluation and comparative analysis of alternatives are based. In general, a high rating on one criterion can offset a low rating on another balancing criterion.

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-28      |

## 2.10.2.1 Long-term Effectiveness and Permanence

Alternative 2 is effective, as TCE concentrations will decrease over time through MNA; however, the residual risks in groundwater will remain unchanged. Alternatives 3 and 4 are effective, as upon completion of the application of the ISCO treatment (Alternative 3) or the organic carbon substrate amendment (Alternative 4), the groundwater is expected to show rapid decreases in TCE concentrations within the treatment area. Alternative 4 provides greater longterm effectiveness than Alternatives 2 and 3 through treatment of the Munitions Waste Pit source area resulting in the reduction of downgradient groundwater and surface water TCE concentrations. The long-term effectiveness and permanence of Alternative 3 is compromised by an active source in the Munitions Waste Pit and is limited due to the rebound effects of TCE concentrations in groundwater. The groundwater restoration timeframe for Alternatives 2 and 3 is 35 years; as Alternative 4 targets the TCE-impacted soil, the groundwater restoration timeframe is estimated at 14 years. Alternatives 5 and 6 are effective, as upon completion of the excavation, the groundwater is expected to show a gradual TCE concentration decrease within the AA. The TCE-impacted soil excavation (included in Alternatives 5, 6 and 7) will permanently remove TCE contamination likely resulting in a significantly reduced MNA timeperiod to cleanup. With Alternatives 6 and 7, the munitions would be permanently removed from within the limits of the excavation. The groundwater restoration timeframe for Alternatives 5, 6 and 7 to achieve the groundwater RAO is estimated to be within eight years, after the source area TCE-impacted soils are removed (ECC, 2017).

Alternative 7 provides the most long-term effectiveness and permanence related to munitions hazards because the MEC items discovered within the entire Inactive Munitions Waste Pit MRS would be removed.

## 2.10.2.2 Reduction in Toxicity, Mobility or Volume through Treatment

Alternatives 1 and 2 do not employ any treatment to contribute to the reduction in the toxicity, mobility, or volume of COCs in groundwater or munitions at the site. Alternative 3 should result in the rapid destruction of groundwater TCE within the treatment zone, reducing both toxicity and volume of TCE at the site. However, because the ISCO treatment targets the areas upgradient and downgradient of the source only, there is not a significant amount of reduction in the volume of TCE, because the majority of the source will remain untreated.

Alternative 4 provides effective reduction of toxicity, mobility, or volume of contamination within the treatment zone by reduction of groundwater TCE concentrations; however, Alternatives 2, 3, and 4 provide no actions that will reduce the hazards of munitions at the Site. Alternatives 5 and 6 effectively reduce the toxicity and mobility of TCE in groundwater through removal of the TCE-impacted soil, and the explosive hazards associated with MEC would be addressed within the excavation area of Munitions Waste Pit. However, Alternatives 5 and 6 will not address munitions in other portions of the MRS.

Alternative 7 would be most effective at reducing the volume of munitions through clearance and removal within the entire MRS, thereby eliminating the explosive hazards associated with MEC. Toxicity, mobility, and volume of TCE-contaminated soil in the source area would be reduced; however, the waste would be transferred from the Site to a disposal facility rather than eliminated.

## 2.10.2.3 Short-term Effectiveness

For Alternatives 2 and 3, modeling predictions estimate the time to achieve the groundwater RAO to be 35 years, and for Alternative 4, remediation of the downgradient TCE plume extending 1,100 ft downgradient is estimated to occur approximately 14 years after the treatment is initiated. Alternative 2 does not pose any additional risks to the surrounding community, the workers, or the environment that cannot be mitigated through LUCs or construction support; however, the short-term effectiveness of Alternative 2 is more favorable than for Alternatives 3, 4, 5, 6 and 7, which include an active remedy such as treatment or excavation.

For Alternatives 3 and 4, there is a risk that site workers may be exposed to contaminated groundwater; however, these risks would be minimized using proper personal protection equipment and field techniques. The short-term effectiveness of Alternatives 5, 6 and 7 are adequate, and the modeling predictions estimate the time to achieve the groundwater RAO to be eight years. Excavation activities included in Alternatives 5, 6 and 7 would require significant material handling, and could result in dust generation and potential volatilization of TCE, posing a risk that site workers may be exposed to contaminated soil; however, these potential risks would be minimized through the use of proper personal protection equipment, good construction practices and standard dust suppression techniques.

There is the potential to encounter munitions during the excavation activities included in Alternatives 5, 6 and 7, posing additional risks to site workers and the surrounding community. These risks would be minimized by proper site worker training in MEC safety procedures, construction support and following construction and MEC-safety protocols during excavation and transportation of munitions.

## 2.10.2.4 Implementability

Alternatives 1 and 2 are the most implementable. Alternatives 4, 5 and 6 are readily implementable. Implementability for Alternative 3 is compromised by the use of a chemical oxidant in an environment where there is a potential for munitions, which presents a potential safety hazard and risk. Additionally, large amounts of buried metal and potential munitions present additional challenges for the implementation of Alternative 3, and as a result the injection points for the chemical amendment must be installed outside the limits of the Munitions Waste Pit to avoid the potential explosive hazards, reducing the effectiveness of this alternative. Alternative 4 is more implementable due to the use of the infiltration gallery technology for the application of the organic substrate amendment to treat the source area and downgradient groundwater plume. Alternatives 5, 6, and 7 involve logistical considerations such as coordinating the construction activities with the active range operations, the potential to encounter munitions during excavation, the handling of contaminated soil, and dust generation. Alternative 7 implementability is limited due to the area required for the large volume of stockpiled materials and tree clearing (on steep terrain) to support the larger excavation and associated staging area. Additionally, access restrictions and work delays would be anticipated during munitions testing within the adjacent active range areas.

# 2.10.2.5 Cost

Alternative 1 is the least costly option, followed by Alternative 2. Alternative 3 is slightly less expensive than Alternative 4. Alternative 4 is less expensive than Alternatives 5, 6 and 7. Alternative 7 involves the highest cost including the greatest initial capital costs, followed by Alternatives 5 and 6. The costs associated with the removal of the entire munitions waste pit under Alternatives 6 and 7 are much higher than those for Alternative 5 due to the presence of stockpiled soil and debris above the larger excavation footprint and staging area. The total present worth cost for each alternative is provided in **Table 9** and a cost comparison summary for each alternative is provided in **Appendix D**.

# 2.10.3 Modifying Criteria

These are criteria that have been considered based on the public and regulator comments received during the public comment period.

# 2.10.3.1 State/Agency Acceptance

This document was prepared in partnership with USEPA and NJDEP representatives. The USEPA and NJDEP have expressed their support for Alternative 6.

# 2.10.3.2 Community Acceptance

During the public comment period (ending on October 25, 2018), the community generally expressed its support for the Selected Remedy and is in favor of Alternative 6 for the 600 Hill Waste Pit remedy.

# 2.11 PRINCIPAL THREAT WASTE

The NCP establishes an expectation that USEPA will use treatment to address the principal threats posed by a site wherever practicable (NCP 300.430(a)(1)(iii)(A)). Identifying principal threat wastes (PTWs) combines concepts of both hazard and risk. In general, PTWs are those source materials considered to be highly toxic or highly mobile that generally cannot be contained in a reliable manner or would present a significant risk to human health or the environment should exposure occur. Conversely, non-PTWs are those source materials that generally can be reliably contained and would present only a low risk in the event of exposure. The manner in which principal threats are addressed generally will determine whether the statutory preference for treatment as a principal element is satisfied. For the 600 Hill Waste Pit, the principal threats are identified as TCE in source soils, because it is at high levels and is considered a continuing source to groundwater, and the explosive hazards related to munitions, (UXO or DMM) (ECC, 2017).

DMM or UXO, if any that remain present at the Site may constitute a principal threat to human health due to the potential for an explosive hazard if the material is moved, handled, or disturbed. If UXO or DMM are later encountered on surfaces in those areas originally addressed by the selected remedy, DoD explosive ordnance disposal personnel or similarly UXO-qualified personnel will evaluate the material to determine if it poses an explosive hazard. Such material that is determined to pose an explosive hazard, which may also be categorized as MEC, will

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-31      |

normally be treated on-site or removed for destruction per applicable DoD explosives safety standards and environmental laws and regulations. The Army and the USEPA will consult, in accordance with the terms of the March 1991 FFA, to make a determination as to whether the material encountered and determined to pose an explosive hazard should be classified as a PTW, as defined by CERCLA, the NCP and USEPA guidance. If the material is determined to be a PTW, the Army will take the necessary actions to ensure protectiveness of human health and the environment to address unacceptable risks posed by the material designated as a PTW.

## 2.12 SELECTED REMEDY

As a result of the comparative analysis, the Army selects: *Alternative 6 - Total Munitions Waste Pit Removal, TCE Source Material Removal, Monitored Natural Attenuation Polishing and LUCs* for the 600 Hill Waste Pit. This Selected Remedy was developed in accordance with CERCLA, as amended and consistent with the NCP, and includes the following components:

- Excavation and off-site disposal of TCE-contaminated soil, carbon substrate application<sup>3</sup> and MEC removal within the entire 0.24-acre Munitions Waste Pit;
- MNA, including groundwater and surface water sampling and an assessment of contaminant trends;
- LUCs, including access control, groundwater and land use restrictions, fencing and signage, safety training and annual inspections, and assessment for VI potential during future building construction; and
- Construction support, which requires the presence of UXO-qualified personnel during all intrusive activities for explosive safety

As presented in more detail in **Section 2.9.6**, Alternative 6 includes excavation and off-site disposal of the entire 0.24-acre Munitions Waste Pit, including the TCE-impacted soil. If encountered, all MEC and MD will be removed within the 0.24-acre munitions waste pit area. Munitions and MD may remain in the uncleared areas of the MRS portion of the Site area (20.76 acres). During the excavation, a UXO-qualified team will provide construction support. Soil screening will be conducted for material where munitions and MD, or significant quantities of cultural debris (drums, vehicles, etc.) are encountered.

This alternative includes confirmatory soil sampling of the limits of excavation and the application of carbon substrate to the excavation to enhance degradation of any residual TCE-contamination in the source area. During the design phase, the NJDEP Impact to Groundwater Guidance (NJDEP, 2008) will be used to determine the Impact to Groundwater SRS to be used as the cleanup criteria during soil excavation for the protection of groundwater. MNA of groundwater and surface water in the 600 Area is included in Alternative 6 as a polishing step

<sup>&</sup>lt;sup>3</sup> Note that the term carbon substrate indicates a generic type of amendment that is a carbon source (electron donors), which is injected into the groundwater to enhance bioremediation through reductive dechlorination of the TCE. The carbon substrate can be EVO, molasses, or other carbon source. The type of carbon substrate will be identified during the design phase for Alternative 6 for the 600 Hill Waste Pit.

upon completion of the removal of the munitions waste pit and TCE-contaminated soil and will continue until the remediation goal for TCE in groundwater (NJDEP GWQS 1  $\mu$ g/L) is achieved.

Alternative 6 will include implementation of LUCs, as specified for Alternative 2 in Section 2.9.2. LUCs will involve performing any site maintenance required to maintain the protectiveness of the remedy. The LUCs and any maintenance that will be implemented by the Army will be detailed in the Remedial Action Work Plan, which will include a Site Health and Safety Plan. An ESS will be prepared to describe the explosive safety considerations for the Selected Remedy, including construction support and handling, and disposal and demolition of any munitions encountered during the construction phase, in accordance with Engineer Manual 385-1-97 and DoD 6055.09M. The ESS will be submitted to and approved by the DDESB prior to beginning work.

# 2.12.1 Summary of the Rationale for the Selected Remedy

The Selected Remedy achieves the RAOs, meets the threshold criteria and provides the best balance of tradeoffs with respect to the balancing and modifying criteria, as detailed in Section 2.10. Alternative 6 is implementable, effective in meeting the RAOs and cost effective for addressing the TCE-impacted groundwater and the explosive hazards related to munitions (UXO and DMM) within the 0.24-acre Munitions Waste Pit. The Selected Remedy is consistent with CERCLA.

# 2.12.2 Summary of Estimated Costs for the Selected Remedy

The costs associated with Alternative 6 are provided in detailed cost tables provided in **Appendix D**, with the totals summarized below:

Estimated Capital Cost: \$2,708,303 Estimated O&M Cost Discounted Over 30 Years: \$602,128 Estimated Present Worth Cost: \$3,310,431

# 2.12.3 Expected Outcomes of the Selected Remedy

It is expected that implementation of Alternative 6 will meet the RAOs for the 600 Hill Waste Pit developed to address the TCE-contaminated groundwater and the explosives hazards associated with munitions within the surface (0 to 6 inches bgs) and subsurface soil (greater than 6 inches bgs) and will provide protection to human health and the environment. The current access restrictions for the 600 Hill Waste Pit are not anticipated to change in the future, and the Site is not currently included in any future overall redevelopment plans, although plans could change in the future. As noted in **Section 2.6** of this ROD, the Site was identified as a prime building area and Alternative 6 was the Army's preferred alternative to enable the land to remain available for future use.

# 2.13 STATUTORY DETERMINATIONS

Under CERCLA §121 and the NCP, the lead agency must select remedies that are protective of human health and the environment and comply with ARARs (unless a statutory waiver is

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-33      |

justified), are cost effective and utilize permanent solutions and remedial action treatment technologies or resource recovery technologies to the maximum extent practicable. In addition, CERCLA includes a preference for remedies that employ treatment and permanently and significantly reduce the volume, toxicity or mobility of hazardous wastes as a principal element and are biased against off-site disposal of untreated wastes. The following sections discuss how the Selected Remedy meets these statutory requirements.

## 2.13.1 Protection of Human Health and the Environment

Alternative 6 provides an adequate protection of human health through removal of MEC and TCE-contaminated soil in the 0.24-acre Inactive Munitions Waste Pit, as well as the implementation of LUCs for groundwater and MEC through groundwater use restrictions and construction support, respectively; therefore, the Selected Remedy meets this criterion.

## 2.13.2 Compliance with Applicable or Relevant and Appropriate Requirements

Alternative 6 meets this threshold criterion. The chemical-specific ARAR for groundwater will be met at the end of the remedial action, when the contaminant levels for TCE fall below the NJDEP GWQS (1 µg/L), which is the most stringent ARAR for TCE in groundwater (Table 4). During the Remedial Design phase of the Selected Remedy, a Site-Specific Impact to Groundwater standard will be established for use during the soil excavation for the protection of groundwater. Alternative 6 complies with the action- and location -specific ARARs (Tables 5 and 6, respectively). The action-specific ARARs are associated with the potential discharge of groundwater to surface water features during groundwater sampling; however, this ARAR will be complied with by disposing all contaminated purge water off-site. Other action-specific ARARs (Table 5) are associated with the requirements for general remediation, including confirmatory sampling, well installation (if determined to be required), as well as the management of any recovered munitions and hazardous waste generated as a result of the remedial action, and for the control and discharge of stormwater resulting from the remedial activities. The only location-specific ARAR (Table 6) is the wetland regulations within the Clean Water Act (Section 402), which regulates construction sites on an acre or greater of land discharging wastewater or stormwater directly from a point source into a surface water feature (such as a stream, waterbody or wetland or wetland transition zone). However, no impacts are anticipated to any wetland area within the 600 Area for the implementation of the Selected Remedy. Actions will be taken to avoid degradation or destruction of wetlands, and wetland transition zones, within the 600 Area during the remedial activities required for implementation of the Selected Remedy. These regulations will be complied with by best management practices to minimize any disturbance or impacts to wetlands or the wetland transition zones within the Site Boundary.

## 2.13.3 Cost Effectiveness

In the lead agency's judgment, the Selected Remedy is cost-effective and represents a reasonable value in the money to be spent. In making this determination, the following definition was used: "A remedy shall be cost-effective if its costs are proportional to its overall effectiveness" (NCP §300.430(f)(1)(ii)(D)). This determination was accomplished by evaluating the "overall

effectiveness" of those RAs that satisfied the threshold criteria (i.e., were both protective of human health and the environment and ARAR-compliant). Overall effectiveness was evaluated by assessing the five balancing criteria in combination (long-term effectiveness and permanence, reduction in toxicity, mobility and volume through treatment, short-term effectiveness, and implementability) and a comparison of the costs to the overall effectiveness was conducted to determine cost effectiveness. The relationship of the overall effectiveness of the Selected Remedy was determined to be proportional to its costs, and hence the Selected Remedy represents a reasonable value for the money to be spent.

The total estimated cost for Alternative 6 is \$3,310,431, including \$2,708,303 in capital costs and \$602,128 in O&M costs. Detailed costs for Alternative 6 are provided in **Appendix D**. The Army believes that the Selected Remedy is cost-effective and is protective of human health and the environment.

# 2.13.4 Long-Term Effectiveness and Permanence

Upon completion of the excavation, the groundwater is expected to show a gradual TCE concentration decrease within the AA. The source material excavation will permanently remove TCE contamination from the site soil, likely resulting in a significantly reduced MNA time period to cleanup. MEC will also be permanently removed from within the limits of excavation. Long-term TCE groundwater concentrations are expected to decrease to the RAO within eight years. Long-term effectiveness will also be dictated by the success of LUCs implemented under the Selected Remedy until the TCE groundwater RAO is achieved. These LUCs are adequate to ensure that any exposure to receptors is within protective levels. LUCs include construction support for subsurface excavations, the base-wide CEA with corresponding WRA and groundwater use restrictions, as evaluated during the CERCLA Five-Year Review. Although the LUC aspects of Alternative 6 provide some long-term effectiveness, potential risk to explosive hazards will remain within the MRS. Alternative 6 meets the RAOs by minimizing unacceptable risks posed by exposure to MEC and supporting future military and limited recreational land use (military training and hunting). LUCs are an adequate and reliable control method to reduce long-term risk associated with potential exposure to MEC. Existing interim LUCs already implemented at Picatinny have demonstrated that they are capable of adequately addressing the long-term risk.

# 2.13.5 Preference for Treatment as a Principal Element

The PTWs for 600 Hill Waste Pit are identified as TCE in source soils and munitions. Alternative 6 satisfies the statutory requirement for treatment of a principal threat, since the remedy is expected to effectively reduce the volume of munitions and MD within the excavated soils through removal, destruction and disposal, thereby reducing the explosive hazards associated with MEC at the site. All encountered munitions will be treated. Alternative 6 includes treatment actions that will reduce the mobility or volume of munitions in the Munitions Waste Pit, but will not address potential munitions in other portions of the MRS.

Alternative 6 is expected to remove up to 95% of the volume of the TCE source soil, thereby reducing the toxicity and mobility of TCE in groundwater through removal of the TCE source. However, the toxicity and volume of soil removed from the Site will be transferred to the

| Record of Decision for 600 Hill Waste Pit | Version: Final |
|---|----------------|
| (PICA-058/Site 12 and PICA-013-R-01)      | July 2019      |
| Picatinny Arsenal, New Jersey             | Page 2-35      |

disposal facility rather than eliminated. Alternative 6 does not employ any treatment that will directly reduce the toxicity, mobility or volume of TCE in groundwater; however, following source area excavation, MNA is expected to treat the remaining groundwater contamination to the TCE remediation goal (NJDEP GWQS 1  $\mu$ g/L) within a 10-year period. The 10-year time period is based on the results of USEPA Bioscreen® simulations that indicate MNA will result in TCE groundwater concentrations below the RAO in approximately eight years, following TCE source removal, with two additional years of MNA monitoring to demonstrate complete restoration (ECC, 2017).

#### 2.14 DOCUMENTATION OF SIGNIFICANT CHANGES FROM SELECTED REMEDY FROM PROPOSED PLAN

The Selected Remedy in this ROD was presented as the Army's Preferred Remedy for the 600 Hill Waste Pit in the Final PP (Army, 2018). No significant changes have been made.

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#### 3.0 PART 3: RESPONSIVENESS SUMMARY

The purpose of the Responsiveness Summary is to provide a summary of the stakeholders' comments, concerns and questions about the Selected Remedy for the 600 Hill Waste Pit and the Army's responses to these concerns.

The Army has fulfilled the public participation requirements identified in 40 CFR 300.430(f) and Title 10 United States Code 2705(b)(2), and maintains an administrative record, which is available for the public, in accordance with 40 CFR 300.800. The remedy for the 600 Hill Waste Pit has been the topic of presentations at the PAERAB. A copy of the *Final Proposed Plan for* 600 Hill Waste Pit (600 Area Groundwater Plume [PICA-058/Site 12] and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01]) (Army, 2018) was given to the PAERAB's co-chair, and a copy was offered to all PAERAB members. The Final 600 Hill Waste Pit PP was completed and released to the public on September 10, 2018 at the information repositories listed in Section 2.3.

The Army held a public meeting on September 26, 2018 to inform the attendees of the remedial alternatives considered and the Selected Remedy for the 600 Hill Waste Pit and to seek comments on the remedy. At this meeting, representatives from the Army, NJDEP, USEPA and the Army's contractor, ECC, were present to answer questions about the Site and the remedial action under consideration.

Following the public meeting, a 30-day public comment period was held from September 26, 2018 to October 25, 2018 during which written comments were received from the public. Comments and responses from the public meeting are presented in **Section 3.1** and the written comments received are provided in **Appendix E** of this ROD.

The Army and USEPA have considered all comments and concerns provided during the public comment period, summarized below, in selecting the final remedy for the Site. The Army and USEPA have made these decisions. Comments received from the NJDEP were considered in selecting the final Selected Remedy. NJDEP concurred with the Selected Remedy, and copies of the concurrence letters for site remedy are included in **Appendix A**.

## 3.1 PUBLIC ISSUES AND LEAD AGENCY RESPONSES

As of the date of this ROD, the Army, USEPA and NJDEP endorse the Selected Remedy for the 600 Hill Waste Pit included herein. Comments received during the public comment period on the PP are summarized below and the written comments received are provided in **Appendix E**. The comments are categorized by source.

## 3.1.1 Summary of Written Comments Received during the Public Comment Period

**Comment No. 1, Mark Hiler, 64 Lyonsville Road, Rockaway Twp, Boonton, New Jersey.** Letter emailed to Mr. Ted Gabel dated September 28, 2018 (**Appendix E**). *As a resident of Rockaway Township, and a member of the Township's Environmental Commission, I attended the presentation of the proposed plan for 600 Hill Waste Pit. It was a clear and concise overview of the environmental issues, and a complete evaluation of the Alternatives. I am in*  total agreement with the Army's recommended Alternative #6. I am always in favor of removal actions when they are possible. It seems lately there have been more Monitored Natural Attenuation and Land Use Controls solutions used, than removal actions. I understand it not always economically possible depending on the risk factors, but I favor "when in doubt dig it out".

I understand the complexity of the environmental cleanup, but it seems the process has slowed down in the last several years. I would like to encourage all stakeholders, Army, Contractors, Regulators, and the Public to think of ways to expedite the process of cleanup.

Army Response to Comment No. 1: No formal response required.

## 3.1.2 Summary of Comments Received during the Public Meeting

**Comment No. 1, Doug Pocze, United States Environmental Protection Agency, Region II, New York, New York.** We support the release of the Proposed Plan for public comment. Final approval of the preferred alternative is given after the public comment period, after public comments are reviewed.

Army Response to Comment No. 1: No formal response required.

**Comment No. 2, Mark Hiler, 64 Lyonsville Road, Rockaway Twp, Boonton, New Jersey.** I'd just like to say as a resident of Rockaway Township and a member of the Restoration Advisory Board that we are always ecstatic when removals are proposed. I know removals are not always practical, but it seems like the last few years, there were more sites with monitored natural attenuation and land use controls.

Army Response to Comment No. 2: No formal response required.

## **3.2 TECHNICAL AND LEGAL ISSUES**

No technical or legal issues were raised on the Selected Remedy.

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Figures

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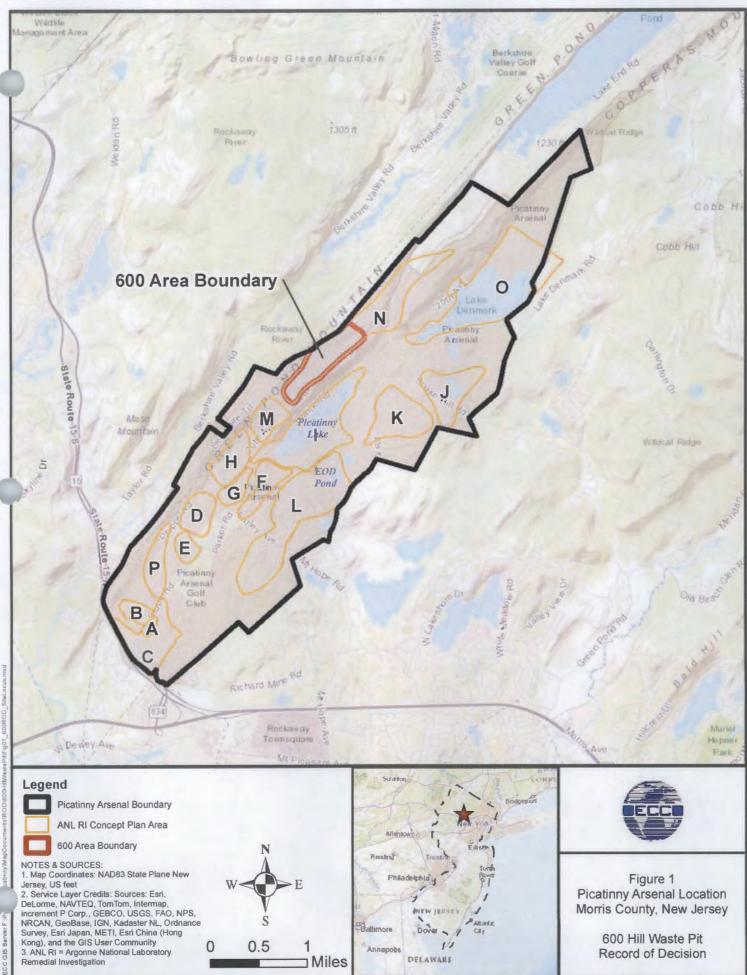
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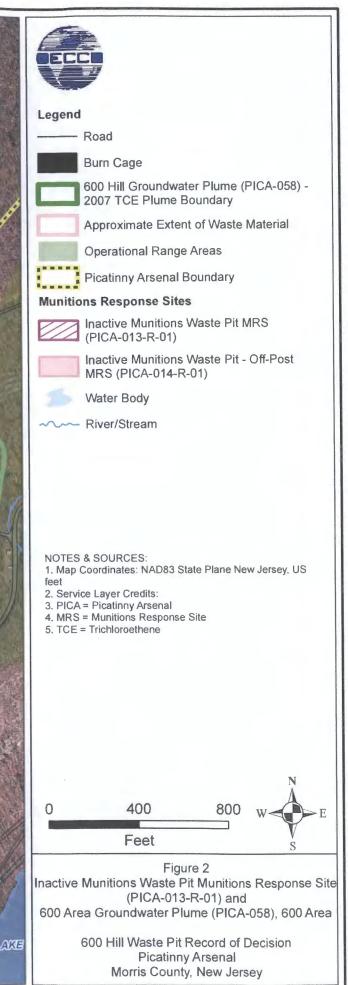
| Number | Title  |
|--------|--|
| 1      | Picatinny Arsenal Location, Morris County, New Jersey  |
| 2      | Inactive Munitions Waste Pit Munitions Response Site (PICA-013-R-01) and 600 Area Groundwater Plume (PICA-058), 600 Area   |
| 3      | 600 Hill Waste Pit, Site Boundary, 600 Area  |
| 4      | 600 Hill Waste Pit, Site Features, 600 Area  |
| 5      | Summary of Groundwater Sample Results, April 2004 – February 2011, 600 Area  |
| 6      | Summary of Surface Water and Sediment Sampling Results, 600 Area   |
| 7      | Source Area Investigation Soil and Soil-Gas Results, 600 Hill Waste Pit, 600<br>Area   |
| 8      | Remedial Alternative 6: Munitions Waste Pit Removal, Monitored Natural Attenuation and Land Use Controls, 600 Area   |
| 9      | Remedial Alternative 2: Groundwater and DoD Military Munitions Land Use Controls, 600 Area   |
| 10     | Digital Geophysical Mapping (DGM) Results, Inactive Munitions Waste Pit,<br>Munitions Response Site, 600 Area  |
| 11     | Remedial Alternative 3: In-Situ Treatment, Injection Points and Monitored Natural Attenuation Sampling Locations, 600 Area   |
| 12     | Remedial Alternative 4: In-Situ Enhanced Anaerobic Bioremediation and<br>Monitored Natural Attenuation Polishing and Land Use Controls, 600 Area   |
| 13     | Remedial Alternative 5: Source Removal, Monitored Natural Attenuation and Land Use Controls, 600 Area  |
| 14     | Remedial Alternative 7: Munitions Waste Pit Removal, Monitored Natural<br>Attenuation, Land Use Controls, and Munitions and Explosives of Concern<br>Clearance of Entire Munitions Response Site, 600 Area |

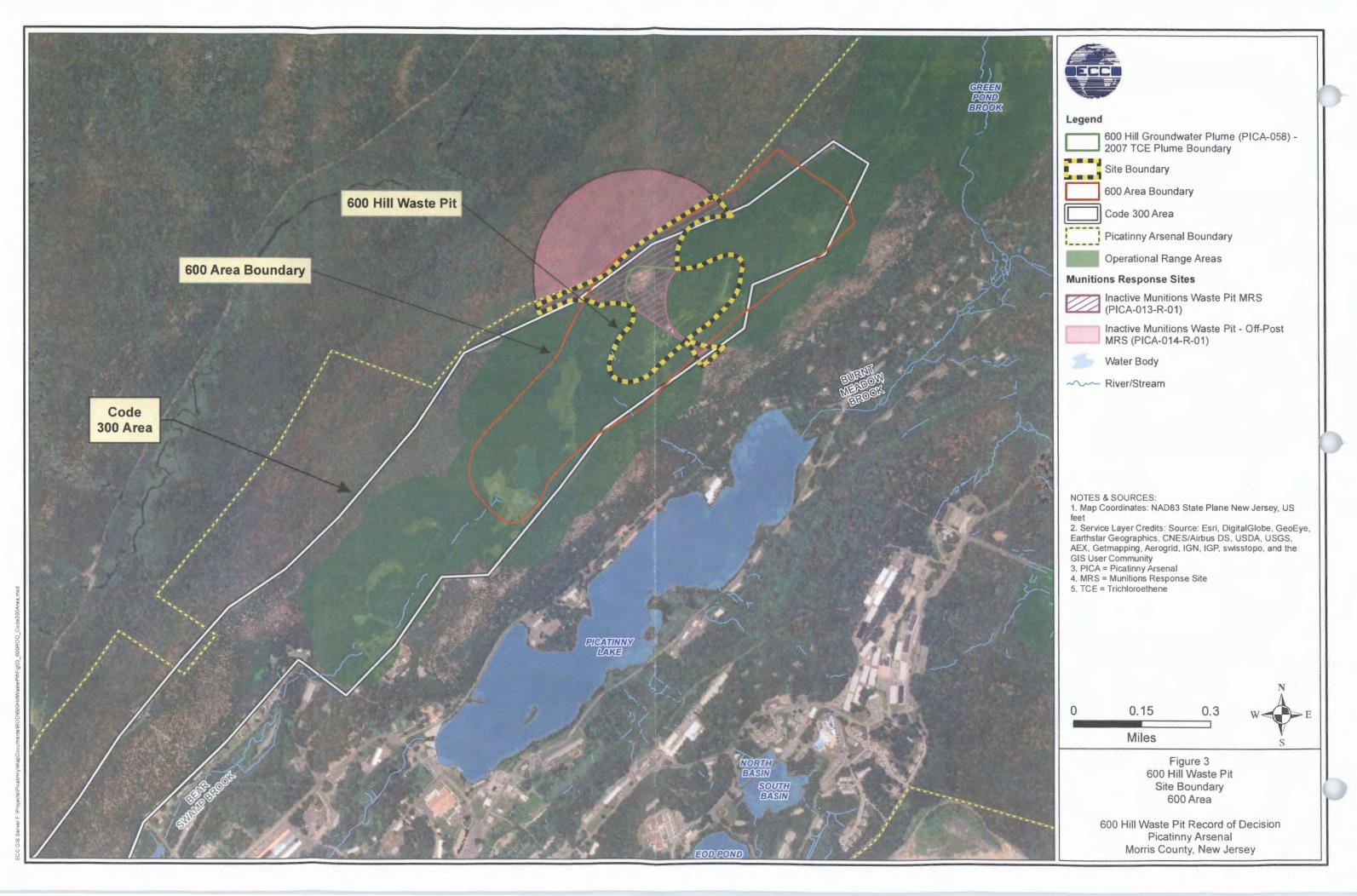
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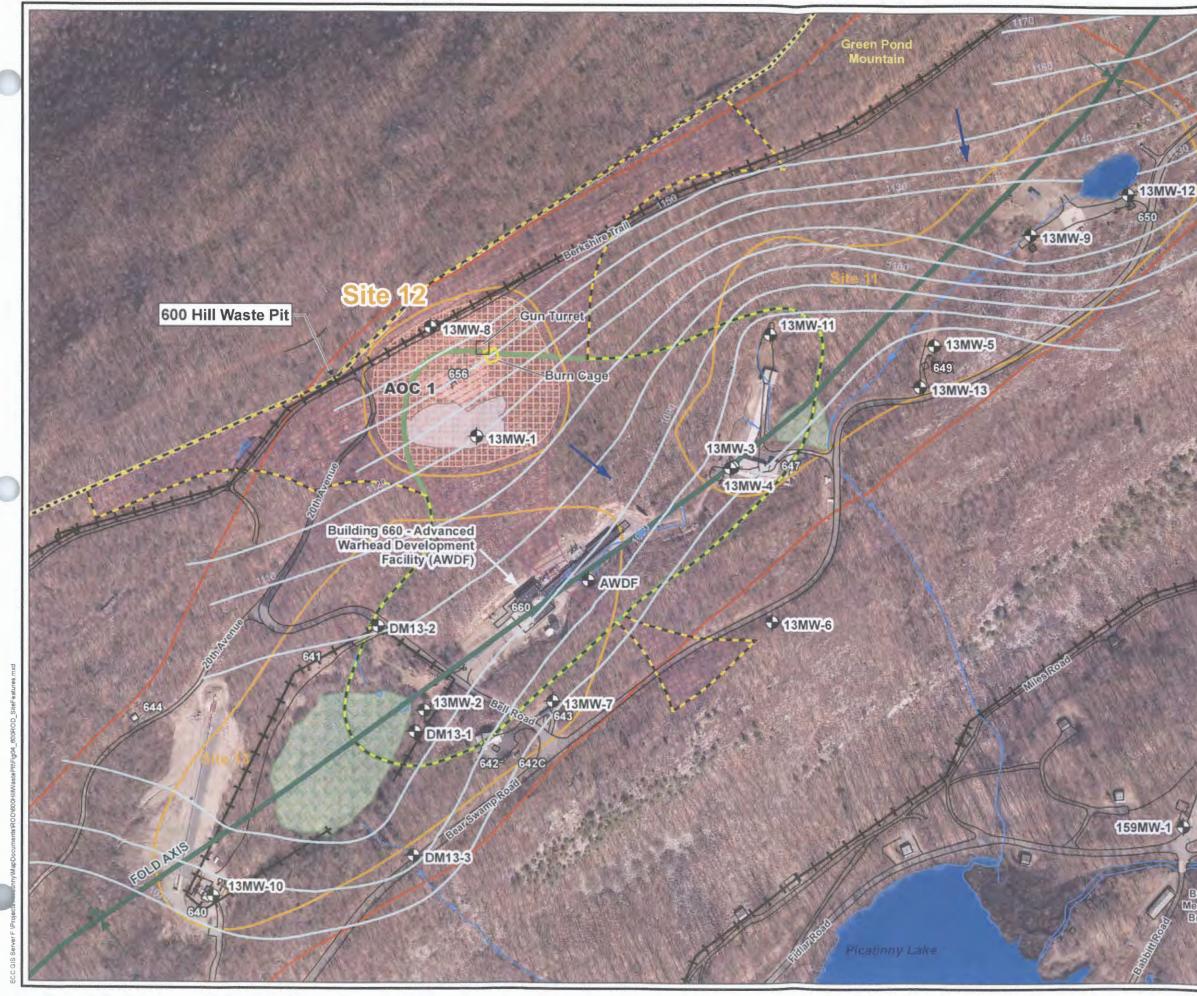


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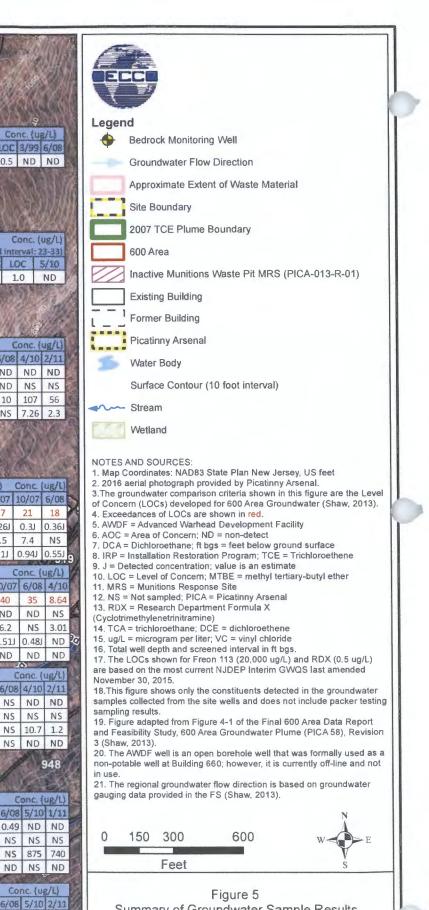






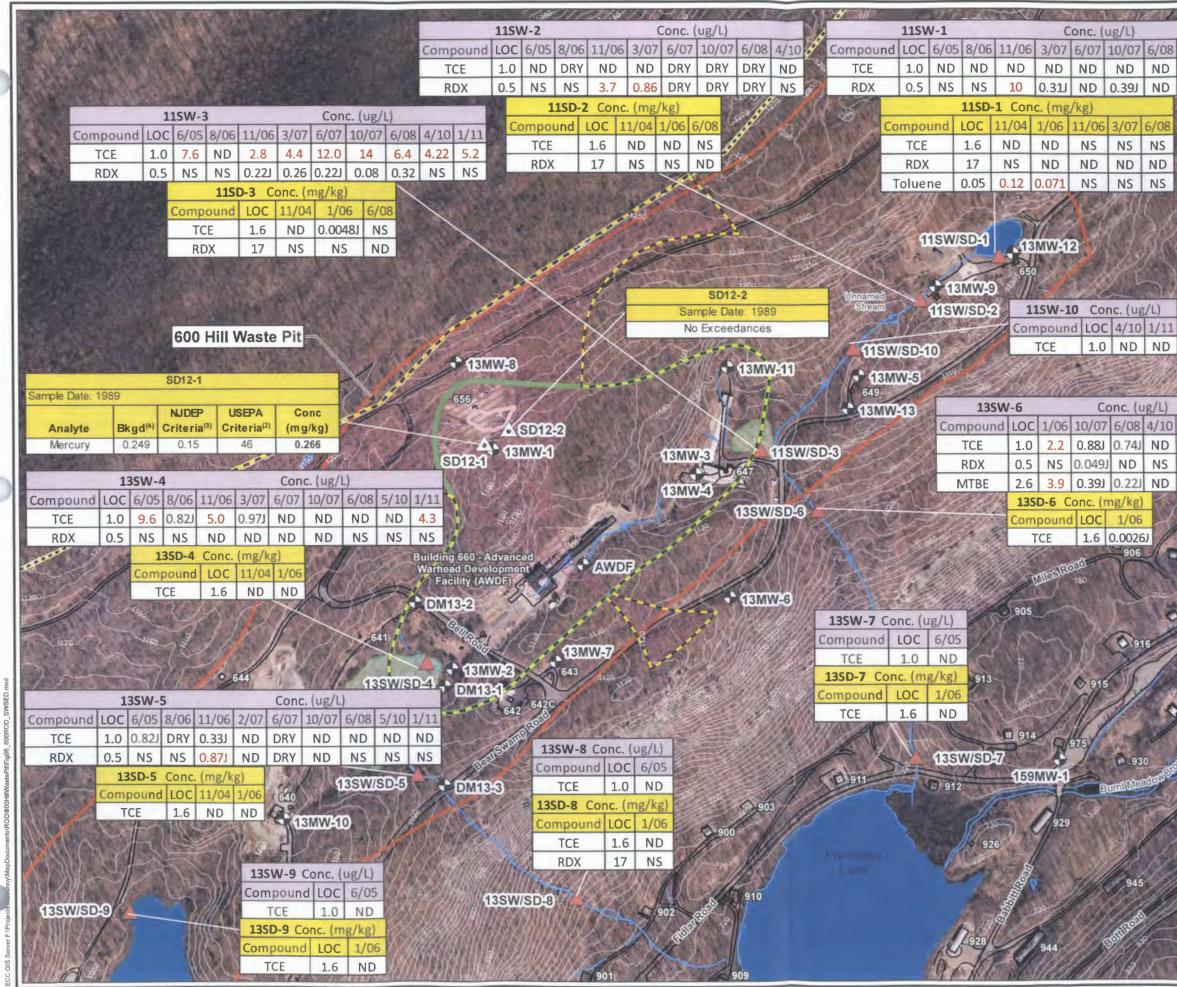
|               | Legend  |
|---------------|---|
|               | Monitoring Well   |
| 1             | Groundwater Contour, June 2007  |
|               | Groundwater Flow Direction  |
|               | Bedrock Fold Axis   |
| 1-3           | Site Boundary   |
| Start's       | 2007 TCE Plume Boundary   |
|               | Burn Cage   |
|               | Inactive Munitions Waste Pit MRS<br>(PICA-013-R-01)   |
| How Chi       | 600 Area  |
| 100           | IRP Site  |
| A.S.          | Area of Concern   |
|               | Approximate Limits of Large Rock Debris   |
|               | Existing Building   |
| A SAME        | E 533 Former Building   |
|               | Picatinny Arsenal   |
|               | S Water Body  |
|               | Stream  |
| No. 1         | Road  |
| Mar and       | Fence Line (Robinson Enclosure)   |
| 1             | Wetland   |
|               | NOTES & SOURCES:<br>1. Map Coordinates: NAD83 State Plane New Jersey, US feet<br>2. 2016 aerial photograph provided by Picatinny Arsenal.<br>3. IRP = Installation Restoration Program<br>4. PICA = Picatinny Arsenal<br>5. AOC = Area of Concern<br>6. AWDF = Advanced Warhead Development Facility<br>7. TCE = Trichloroethene<br>8. Figure adapted from Figure 2-1 of the Final 600 Area Data<br>Report and Feasibility Study, 600 Area Groundwater Plume<br>(PICA 58), Revision 3 (Shaw, 2013). Bedrock geology<br>features obtained from Figure 2-5 (Shaw, 2013).<br>9. The AWDF well is an open borehole well that was formally<br>used as a non-potable well at Building 660; however, it is<br>currently off-line and not in use.<br>10. The regional groundwater flow direction is based on<br>groundwater gauging data provided in the FS (Shaw, 2013). |
| " X           | 0 150 300 600 w   |
| 1             | Feet  |
|               | Figure 4  |
| A MAN         | 600 Hill Waste Pit  |
| turnt         | Site Features   |
| adow/<br>rook | 600 Area  |
| 1115 1        | 600 Hill Waste Pit Record of Decision   |
| S. C.S.       | Picatinny Arsenal   |
| be 1          | Morris County, New Jersey   |
|               |   |

| Sample ID - Depth (ft)         Compound         LOC         Date         Conc. (ug/L)           13MW14-128         TCE         1.0         1/13         ND           13MW14-270         TCE         1.0         1/13         ND           13MW14-325         TCE         1.0         1/13         ND           13MW14-325         TCE         1.0         1/13         ND           13MW-8 (Total Depth-103): Screened Interval. 78-103)         Conc. (ug/L)         Compound         LOC         7/06         3/07         6/07         10/07         6/08         5/10         1/11           TCE         1.0         ND         ND         ND         ND         ND         ND           RDX         0.5         NS         ND         ND         0.42         NS         NS           Freon113         20,000         0.601         1.0         0.491         0.651         NS         1.46         0.65           Toluene         600         1.5         1.1         0.291         0.191         ND         ND   |  | 6/08<br>ND<br>C. (ug/L)<br>6/08<br>ND<br>DM10-1<br>DM10-1<br>DM10-2<br>MW-2_N<br>Compound LQC 3/99 6/08  |
|---|--|--|
| 13MW-1 (Total Depth: 263, Screened interval: 228-253)       Conc. (ug/1)         Compound LOC 5/05 7/06 11/06 3/07 7/07 10/07 6/08 5/10 2/11         TCE 1.0 140 140 120 170 130 120 110 116 96         RDX 0.5 NS NS 0.55 0.62 0.62 0.67 NS NS NS         Freen113 20,000 28 32 43 93 56 52 NS 72.7 66         1,2-DCA 2.0 ND ND ND ND ND ND 20 ND ND ND         1,1,2,2-TCA 1.0 ND ND ND ND ND 5.1 ND ND ND         AWDF (Total Depth: 430, Screened Interval: NA)  | GOO Hill         Freen113         20,000         1.4         NS         0.3         8.9         81.0           Waste Pit         130         140         130         140   | NS 3.8<br>150<br>13MW-12 Conc. (ug/L)<br>Total Depth: 33, Screened Interval; 23-33)<br>Compound LOC 5/10<br>TCE 1.0 ND<br>13MW-9<br>13MW-9<br>13MW-5 (Total Depth: 150, Screened Interval; 125-150) Conc. (ug/L)   |
| Compound         LOC         4/04         7/06         11/06         3/07         6/07         10/07         6/08         5/10         1/11           TCE         1.0         110         81         87         120         61         58         86         95.9         62           RDX         0.5         0.49         NS         0.11J         0.34J         0.23J         0.2J         NS         NS         NS           Freon113         20,000         33         15         ND         2.9         8.0         6.4         NS         15.4         10           MTBE         70         0.31         ND         ND         ND         ND         ND         0.28J         NS         ND           DM13-2         (Total Depth: 18, Screened Interval: 8-18)         Conc. (ug/L)           Compound         LOC         4/04         5/05         7/06         11/06         3/07         6/07         10/07         6/08         5/10         1/11           TCE         1.0         15         5.2         8.6         0.771         0.401         2.6         NS         NS         NS           RDX         0.5         NS         NS         NS <td>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1<br/>13MW-1</td> <td>Campound         LOC         7/06         11/06         3/07         6/07         10/07         6/08         4/10         2/11           TCE         1.0         ND         ND</td> | 13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1<br>13MW-1   | Campound         LOC         7/06         11/06         3/07         6/07         10/07         6/08         4/10         2/11           TCE         1.0         ND         ND      |
| Compound         LOC         5/05         7/06         11/06         3/07         6/07         10/07         6/08         5/10         2/11           TCE         1.0         42         130         81         110         130         110         130         171         210           RDX         0.5         NS         NS         0.18J         0.23J         0.2J         0.18J         NS         NS         NS           Freon113         20,000         14         60         31         45         52         41         NS         81.3         64           Toluene         600         31         ND         A1         52         41         NS         81.3         64         A1         A1         A1         A1         A2         A2         A1         A1         A2         A1         A1 <t< td=""><td>Building 660 - Advanced<br/>Warhead Development<br/>Facility (AWDF)<br/>DM13-2<br/>15MW-2<br/>642<br/>643</td><td>RDX         0.5         NS         ND         0.12J         0.29J         0.26J         0.3J         0.36J           Freon113         20,000         4.7         2.4         2.8         9.0         5.5         7.4         NS           MTBE         70         3.8         2.9         3.6         2.3         1.1J         0.94J         0.55J         9.0           13MW-4         (Total Depth: 193, Screened Interval: 168-193)         Conc. (ug/L)           Compound         LOC         5/05         7/06         11/06         3/07         6/07         10/07         6/08         4/10           TCE         1.0         39         15         19         34         33         40         35         8.64           RDX         0.5         NS         NS         ND         ND         0.11J         ND         ND         NS           Freon113         20,000         28         7.4         31         9.3         9.8         6.2         NS         3.01           MTBE         70         1         0.33         0.51J         0.567         0.54J         0.51J         0.48J         ND           VC         1         ND</td></t<>  | Building 660 - Advanced<br>Warhead Development<br>Facility (AWDF)<br>DM13-2<br>15MW-2<br>642<br>643  | RDX         0.5         NS         ND         0.12J         0.29J         0.26J         0.3J         0.36J           Freon113         20,000         4.7         2.4         2.8         9.0         5.5         7.4         NS           MTBE         70         3.8         2.9         3.6         2.3         1.1J         0.94J         0.55J         9.0           13MW-4         (Total Depth: 193, Screened Interval: 168-193)         Conc. (ug/L)           Compound         LOC         5/05         7/06         11/06         3/07         6/07         10/07         6/08         4/10           TCE         1.0         39         15         19         34         33         40         35         8.64           RDX         0.5         NS         NS         ND         ND         0.11J         ND         ND         NS           Freon113         20,000         28         7.4         31         9.3         9.8         6.2         NS         3.01           MTBE         70         1         0.33         0.51J         0.567         0.54J         0.51J         0.48J         ND           VC         1         ND          |
| Torrently. mod  | DM13-3<br>DM13-3<br>DM13-3<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S564<br>DM13-3<br>S5 | Compound         LOC         7/06         12/05         3/07         10/07         10/07         4/15         4/15           TCE         1.0         ND         ND         ND         ND         ND         ND         NS         ND         ND           RDX         0.5         NS         ND         0.3         ND         ND         NS         NS         NS           Freen113         20,000         0.74J         ND         1.0         0.5         0.9J         NS         10.7         1.2           MTBE         70         ND                    |
| Signature         Compound           LOC         3/07         6/07         10/07         6/08         5/10         1/11         R   | B-3 (Total Depth: 27, Screened Interval: 17-27)         Conc. (ug/l)           Dound         LOC         4/04         5/05         7/06         11/06         3/07         6/07         10/07         6/08         5/10         1/11           CE         1.0         0.22         9.5         0.31         ND         ND <t< td=""><td>Houriss         20,000         470         340         120         70</td></t<>   | Houriss         20,000         470         340         120         70 |

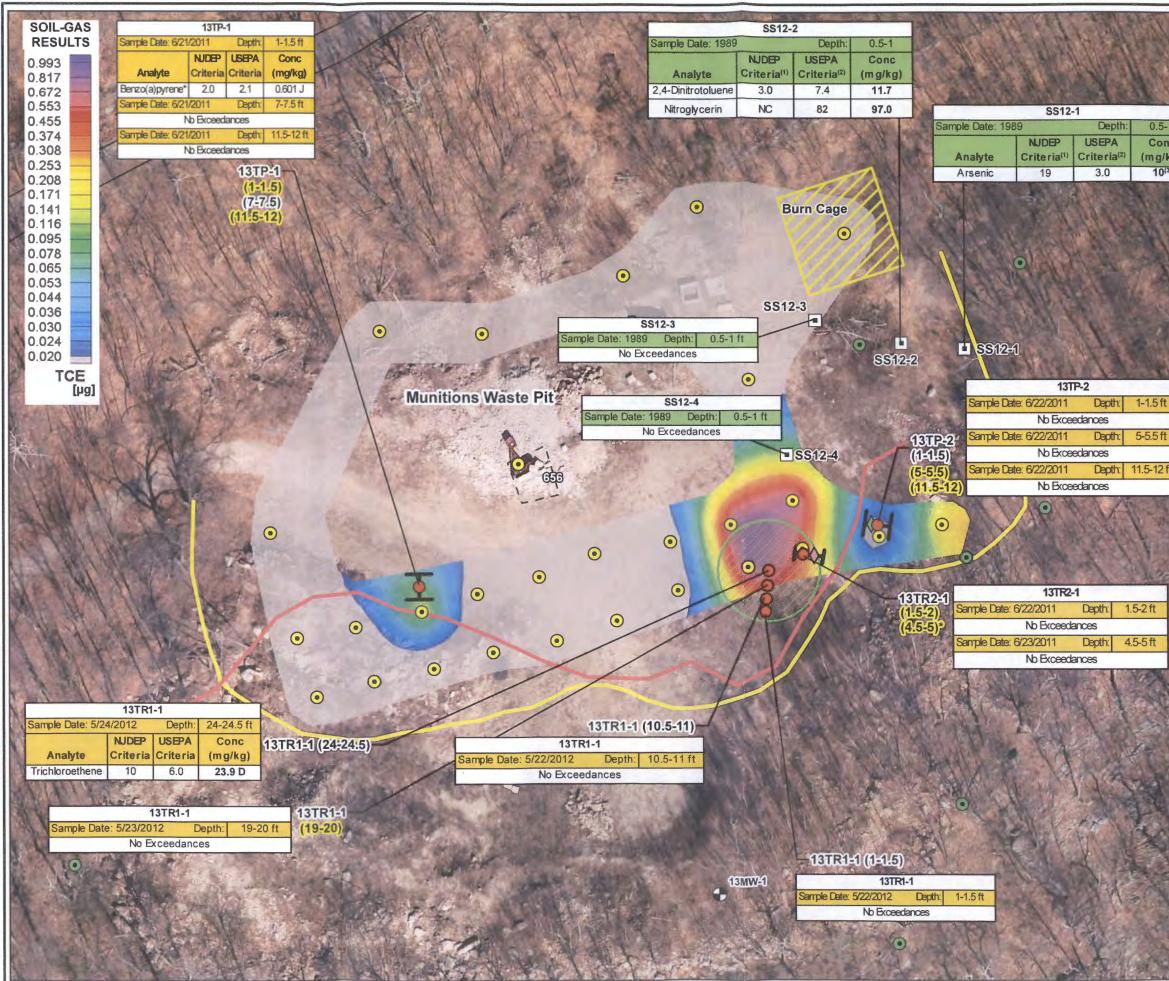


Summary of Groundwater Sample Results April 2004 - February 2011, 600 Area

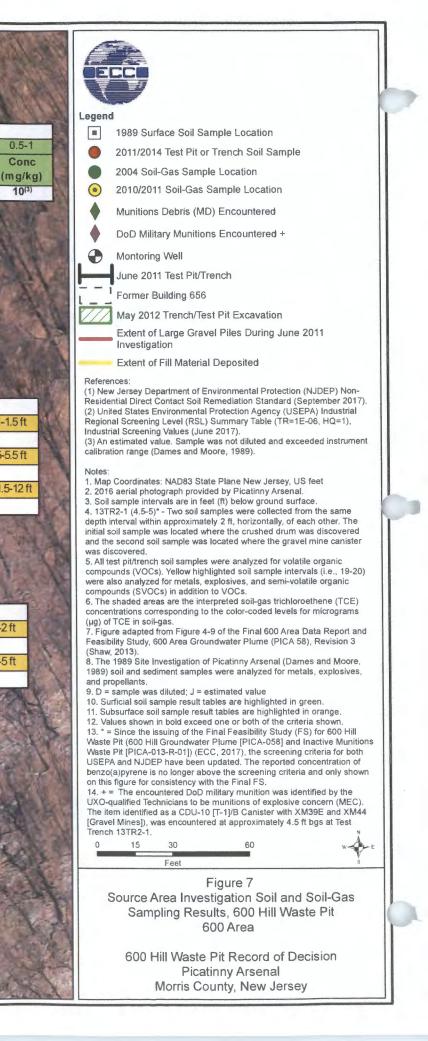
600 Hill Waste Pit Record of Decision Picatinny Arsenal Morris County, New Jersey

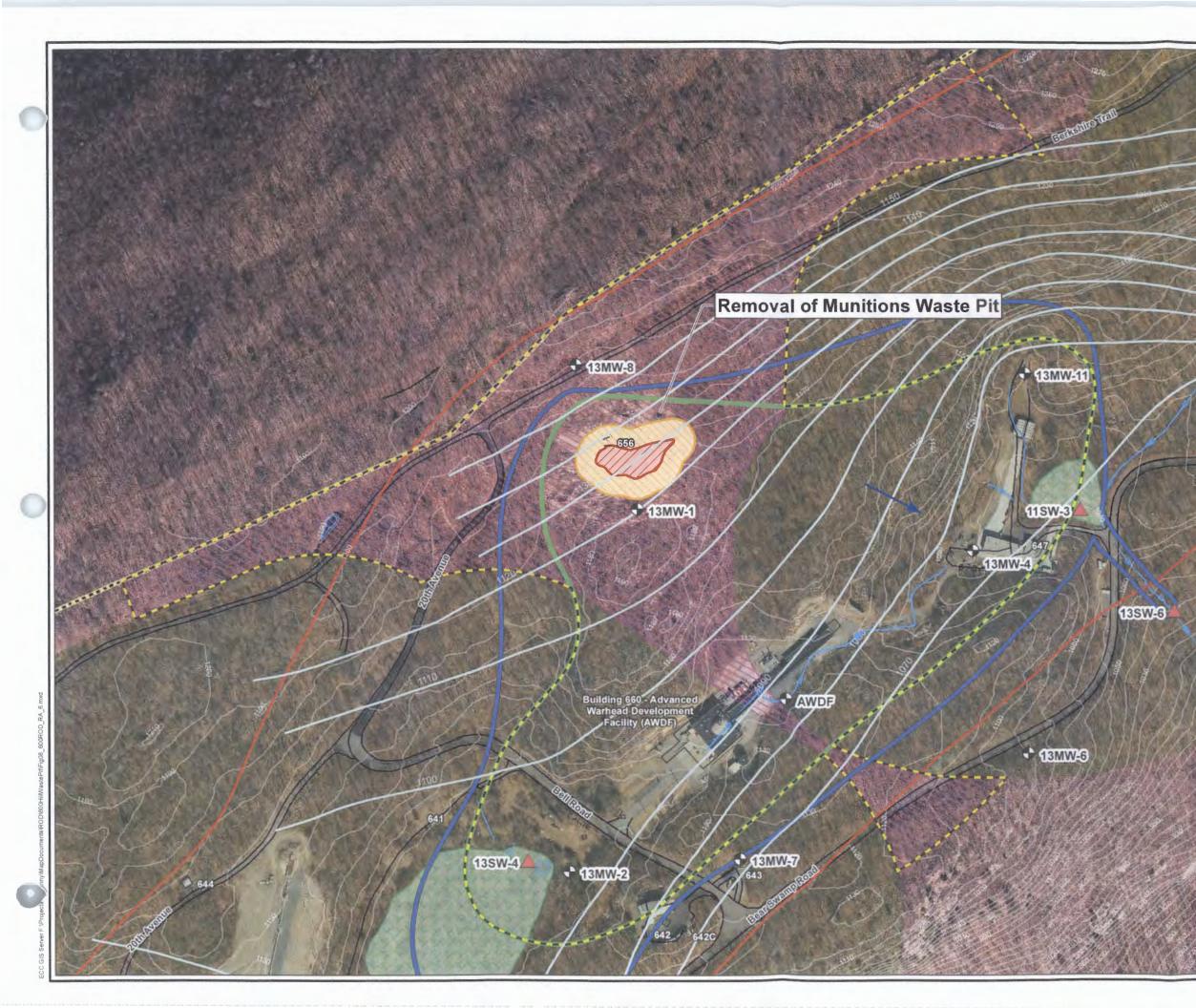


| 4/10<br>ND<br>NS | Legend  |
|------------------|---|
| Z h 0            | 1989 Sediment Sample Location   |
| <b>HOR</b>       | Surface Water/Sediment Sample Location  |
| C. S. O.S.       | •   |
| Constraints in   | MNA Monitoring and Compliance Well  |
| 1                | Site Boundary   |
| 15               | 2007 TCE Plume Boundary   |
| 31               | Inactive Munitions Waste Pit MRS (PICA-013-R-01)  |
| INC.             | 600 Area  |
| No.S.            | Approximate Extent of Waste Material  |
|                  | Existing Building   |
|                  | Former Building   |
| 10/201           | Picatinny Arsenal   |
| 09/11            | Water Body  |
| 1.2              | Surface Contour (10 foot interval)  |
|                  | Stream  |
| - 3              | Wetland   |
| /11              | NOTES AND SOURCES:  |
| 3.4              | Map Coordinates: NAD83 State Plane New Jersey, US feet     2. 2016 aerial photograph provided by Picatinny Arsenal.     The surface water comparison criteria (LOCs) shown in this figure are based on  |
| NS               | <ol> <li>The surface water comparison chief a (LOCs) shown in this ingute are based on<br/>NJDEP Surface Water Quality Standards (SWQS) last amended April 4, 2011 and<br/>the NJDEP Interim GWQS last updated November 30, 2015 (for RDX only). The</li> </ol> |
| ND               | sediment comparison criteria (LOCs) shown in this figure are based on the NJDEP<br>Ecological Screening Criteria - Effects Range -Low (ER-Ls) effective March 2009.   |
| 17               | The comparison criteria for RDX in sediment (17 mg/kg) is based on the NJDEP<br>Interim (Non-promulgated) Non-Residential Soil Remediation Standard. The  |
| D. A.            | comparison criteria for toluene in sediment (0.05 mg/kg) is based on the<br>Toxicological Benchmarks for Screening Contaminants of Potential Concern for  |
| 907              | Effects on Sediment-Associated Biota – Oak Ridge National Laboratory (ORNL).<br>November 1997, The screening criteria for MTBE (2.6 ug/L) in surface water is   |
| 1                | based on the USEPA Region III Tap Water Risk Based Criteria (RBC for<br>Carcinogen 1x10-6).<br>4. Note the NJDEP SWQS for TCE has been updated in April 2011 from 1.09 ug/L   |
| A                | to 1.0 ug/L which is shown in this figure.<br>5. The surface water LOC shown for RDX (0.5 ug/L) is based on the most current  |
| 1                | NJDEP Interim GWQS, last amended November 30, 2015.<br>6. Exceedances of LOCs are shown in red.   |
| 917              | 7. AWDF = Advanced Warhead Development Facility<br>8. ft bgs = feet below ground surface  |
| -                | <ol> <li>J = Detected concentration; value is an estimate</li> <li>LOC = Level of Concern; MTBE = methyl tertiary-butyl ether</li> </ol>  |
|                  | <ol> <li>MRS = Munitions Response Site; mg/kg = milligrams per kilogram</li> <li>ND = Not detected; NS= Not sampled</li> </ol>  |
| A                | 13. PICA = Picatinny Arsenal; TCE = Trichloroethene     14. RDX = Research Department Formula X (Cyclotrimethylenetrinitramine)     15. ug/L = microgram per liter  |
| 931              | <ol> <li>This figure shows only the constituents detected in the surface water and<br/>sediment samples collected.</li> </ol>   |
|                  | <ol> <li>Boxes for surface water results are highlighted in purple and boxes for sediment<br/>sample results are highlighted in yellow.</li> </ol>  |
| 1 1              | <ol> <li>Figure adapted from Figure 4-5 of the Final 600 Area Data Report and<br/>Feasibility Study, 600 Area Groundwater Plume (PICA 58), Revision 3 (Shaw,</li> </ol>   |
|                  | 2013).<br>19. The AWDF well is an open borehole well that was formally used as a non-<br>potable well at Building 660; however, it is currently off-line and not in use.  |
| 1/20             | N   |
| 2/11             | 0 200 400 W   |
| 946              | Feet S  |
| CALIS            | Figure 6  |
|                  | Summary of Surface Water  |
|                  | and Sediment Sampling Results   |
| 1                | 600 Area  |
| 1                | 600 Hill Waste Pit Record of Decision   |
| 1.15             | Picatinny Arsenal   |
| P.               | Morris County, New Jersey   |

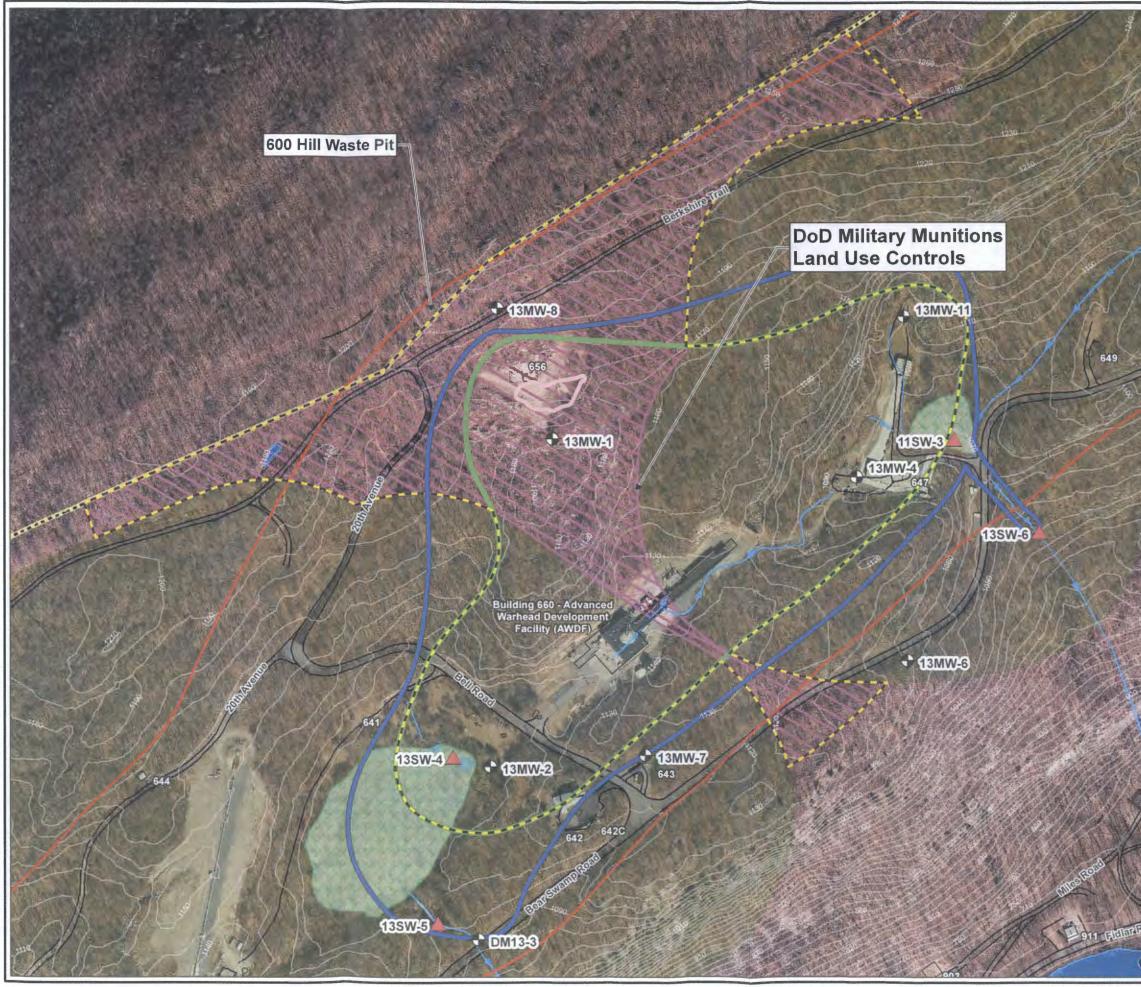


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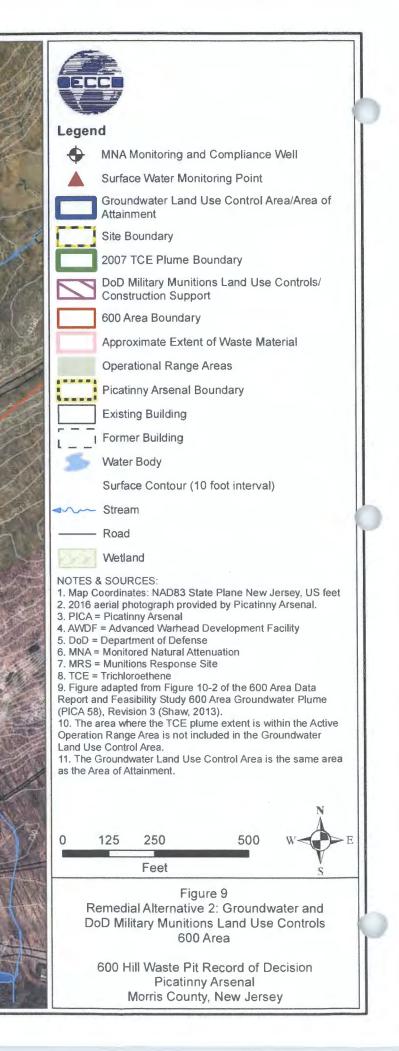


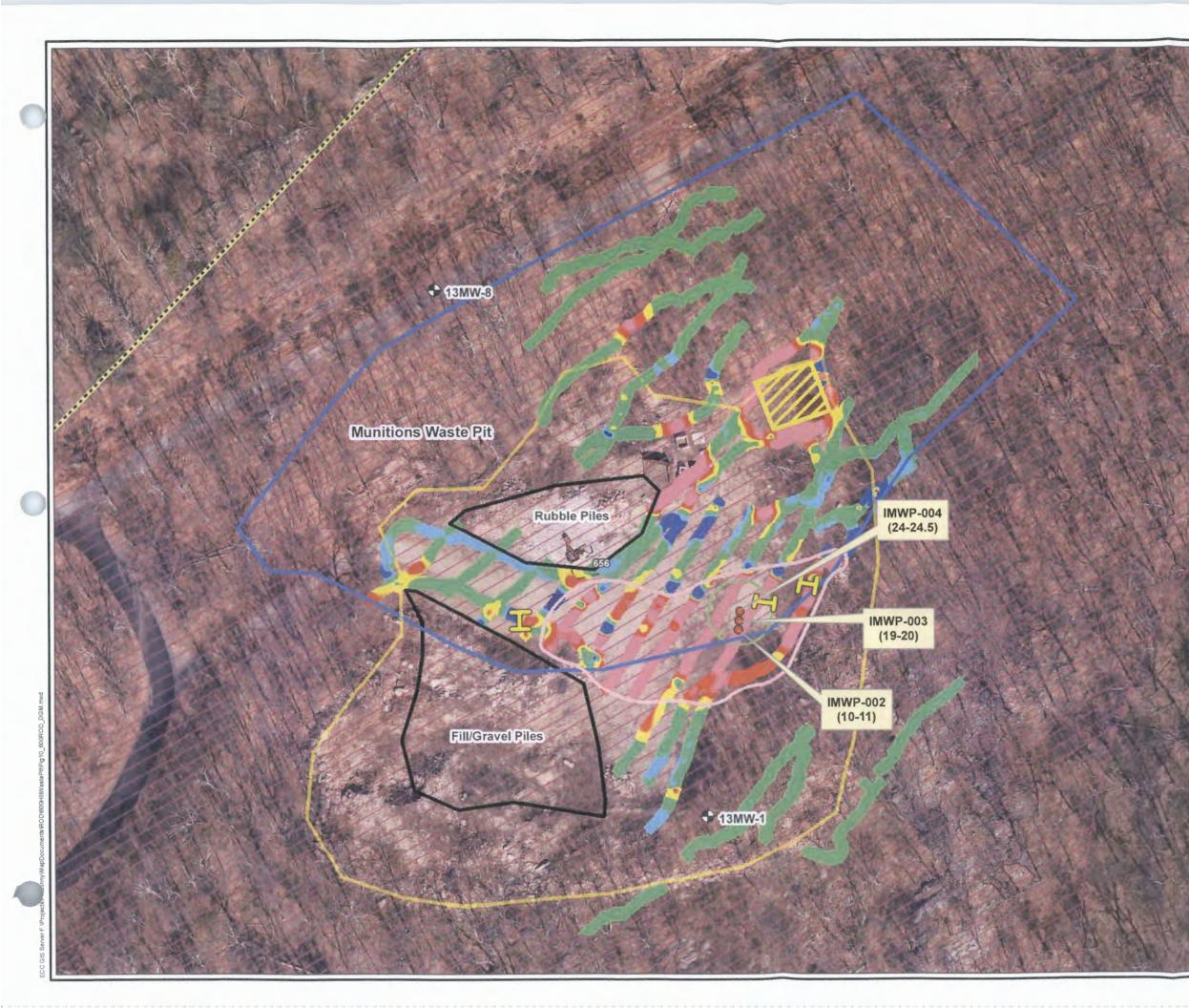


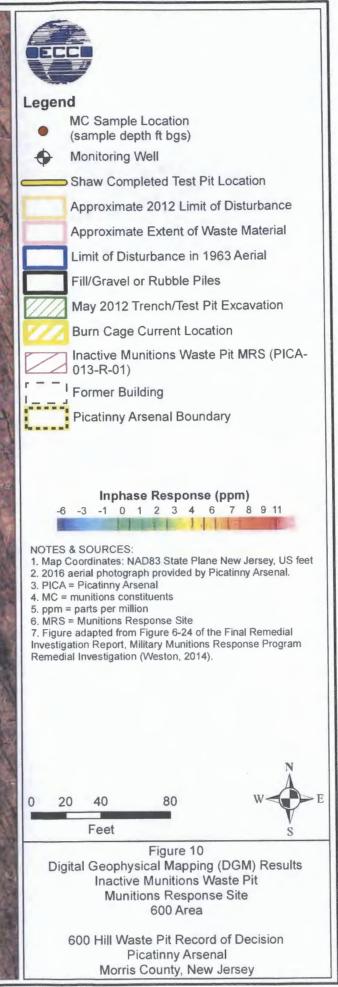
| Leger    |   |  |  |  |  |  |  |
|----------|---|--|--|--|--|--|--|
| Leger    | Surface Water Monitoring Point  |  |  |  |  |  |  |
|          |   |  |  |  |  |  |  |
| T        | MNA Monitoring and Compliance Well  |  |  |  |  |  |  |
|          | Groundwater Flow Direction  |  |  |  |  |  |  |
| 2        | Groundwater Contour, June 2007  |  |  |  |  |  |  |
|          | Groundwater Land Use Control Area/Area of Attainment  |  |  |  |  |  |  |
| Propos   | Proposed Remedial Alternatives Excavation Area/No UXO Related LUC/Construction  |  |  |  |  |  |  |
| 7772     | Support Required *  |  |  |  |  |  |  |
| 200      | Cutback Area (50' Buffer of Excavation Area)  |  |  |  |  |  |  |
|          | Site Boundary   |  |  |  |  |  |  |
|          | 2007 TCE Plume Boundary   |  |  |  |  |  |  |
|          | DoD Military Munitions Land Use Controls/Construction   |  |  |  |  |  |  |
|          | Support<br>600 Area Boundary  |  |  |  |  |  |  |
|          | Existing Building   |  |  |  |  |  |  |
|          | Former Building   |  |  |  |  |  |  |
|          | Operational Range Areas   |  |  |  |  |  |  |
|          | Picatinny Arsenal   |  |  |  |  |  |  |
|          | Boundary  |  |  |  |  |  |  |
|          | Surface Contour (10 foot interval)  |  |  |  |  |  |  |
|          | Stream  |  |  |  |  |  |  |
| 1.4.2    | Wetland   |  |  |  |  |  |  |
|          | NOTES & SOURCES:<br>1. Map Coordinates: NAD83 State Plane New Jersey, US feet   |  |  |  |  |  |  |
| 2. 2016  | <ol> <li>2.2016 aerial photograph provided by Picatinny Arsenal.</li> <li>* Excavation Area based on approximate location of munitions</li> </ol> |  |  |  |  |  |  |
| waste p  | waste pit identified in the Military Munitions Response Program<br>Remedial Investigation (Weston, 2014).   |  |  |  |  |  |  |
| 4. LUC   | = Land Use Controls<br>F = Advanced Warhead Development Facility  |  |  |  |  |  |  |
| 6. PICA  | A = Picatinny Arsenal<br>A = Monitored Natural Attenuation  |  |  |  |  |  |  |
| 8. UXO   | = Unexploded Ordnance<br>= Trichloroethene  |  |  |  |  |  |  |
| 10. Fig  | ure adapted from Figure 10-4 of the 600 Area Data Report and<br>ility Study 600 Area Groundwater Plume (PICA 58), Revision 3                      |  |  |  |  |  |  |
| (Shaw,   | 2013).  |  |  |  |  |  |  |
|          | area where the TCE plume extent is within the Active<br>ion Range Area is not included in the Groundwater Land Use                                |  |  |  |  |  |  |
| 12. The  | AWDF well is an open borehole well that was formally used as<br>obtable well at Building 660; however, it is currently off-line and               |  |  |  |  |  |  |
| not in u | ise.  |  |  |  |  |  |  |
| gaugin   | e regional groundwater flow direction is based on groundwater<br>g data provided in the FS (Shaw, 2013).  |  |  |  |  |  |  |
| amend    | ernative 6 includes the application of carbon substrate<br>ment to the excavation area in order to enhance the                                    |  |  |  |  |  |  |
| emulsit  | ation of TCE in the groundwater. The carbon substrate can be<br>fied vegetable oil (EVO), molasses, or other carbon source                        |  |  |  |  |  |  |
| which    | will be identified during the Design Phase for Alternative 6. N   |  |  |  |  |  |  |
|          | 125 250 500 W Fe  |  |  |  |  |  |  |
|          | Figure 8  |  |  |  |  |  |  |
| Re       | emedial Alternative 6: Munitions Waste Pit  |  |  |  |  |  |  |
| Remo     | oval, Monitored Natural Attenuation Polishing,  |  |  |  |  |  |  |
|          | and Land Use Controls, 600 Area   |  |  |  |  |  |  |
|          | 600 Hill Waste Pit Record of Decision   |  |  |  |  |  |  |
|          | Picatinny Arsenal   |  |  |  |  |  |  |
|          | Morris County, New Jersey   |  |  |  |  |  |  |

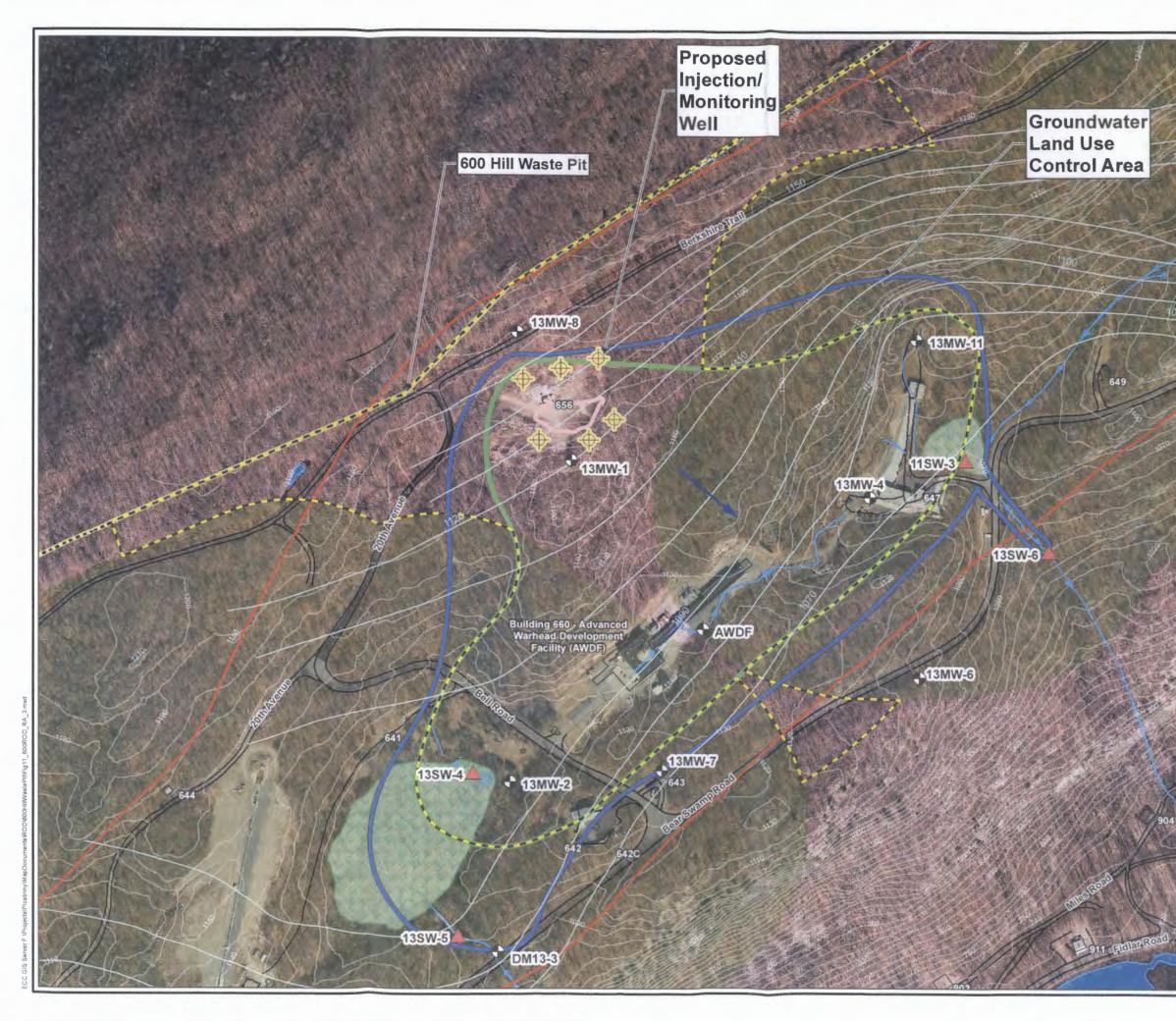


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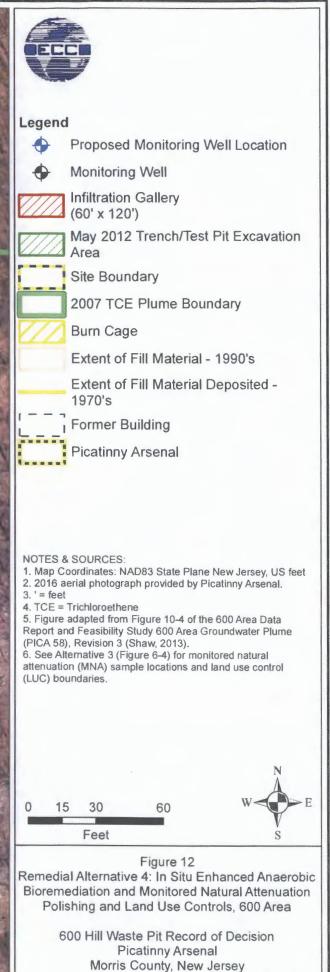


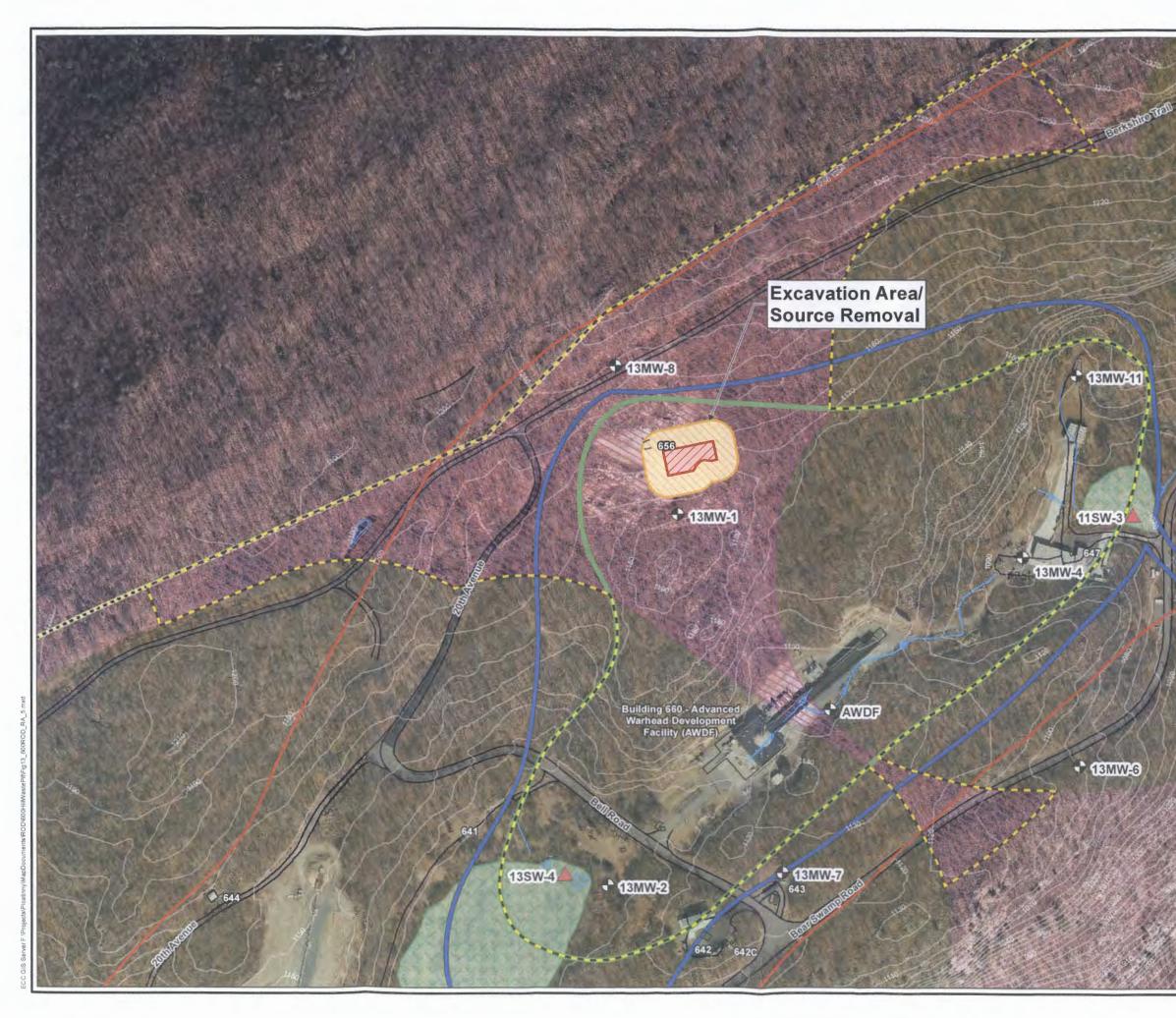




|                   |   | 1 |
|-------------------|---|---|
|                   |   |   |
| 21/               | Legend  | P |
| 30                | Proposed Injection/Monitoring Well  |   |
| A                 | Surface Water Monitoring Point  |   |
| 10                | MNA Monitoring and Compliance Well  |   |
|                   | Groundwater Flow Direction  |   |
| Ľ                 | Groundwater Contour, June 2007  |   |
|                   | Groundwater Land Use Control Area/Area of Attainment  |   |
| 10 -22            | Site Boundary   |   |
|                   | 2007 TCE Plume Boundary   |   |
| The second second | 600 Area Boundary   |   |
| 1                 | Approximate Extent of Waste Material  |   |
| 12                | Existing Building   |   |
| Z                 | F Former Building   |   |
| 1                 | Operational Range Areas   |   |
| 14                | Picatinny Arsenal Boundary  |   |
| Set               | Water Body  | 5 |
|                   | Surface Contour (10 foot interval)  | ۲ |
| V H               | Stream  |   |
| A.F.              | Wetland   |   |
|                   | <ul> <li>NOTES &amp; SOURCES:</li> <li>Map Coordinates: NAD83 State Plane New Jersey, US feet</li> <li>2016 aerial photograph provided by Picatinny Arsenal.</li> <li>PICA = Picatinny Arsenal</li> <li>AWDF = Advanced Warhead Development Facility</li> <li>MNA = Monitored Natural Attenuation</li> <li>TCE = Trichloroethene</li> <li>Figure adapted from Figure 10-3 of the 600 Area Data<br/>Report and Feasibility Study 600 Area Groundwater Plume<br/>(PICA 58), Revision 3 (Shaw, 2013).</li> <li>The area where the TCE plume extent is within the Active<br/>Operation Range Area is not included in the Groundwater<br/>Land Use Control Area.</li> <li>The AWDF well is an open borehole well that was formally<br/>used as a non-potable well at Building 660; however, it is</li> </ul> |   |
| 7                 | currently off-line and not in use.<br>10. The regional groundwater flow direction is based on<br>groundwater gauging data provided in the Final 600 Area<br>Data Report and Feasibility Study, 600 Area Groundwater<br>Plume (PICA 58), Revision 3 (Shaw, 2013).<br>0 125 250 500   |   |
| A                 | Feet  |   |
|                   | Figure 11<br>Remedial Alternative 3:<br>In-Situ Treatment, Injection Points and<br>Monitored Natural Attenuation Sampling Locations<br>600 Area   |   |
|                   | 600 Hill Waste Pit Record of Decision<br>Picatinny Arsenal<br>Morris County, New Jersey   |   |
|                   |   |   |

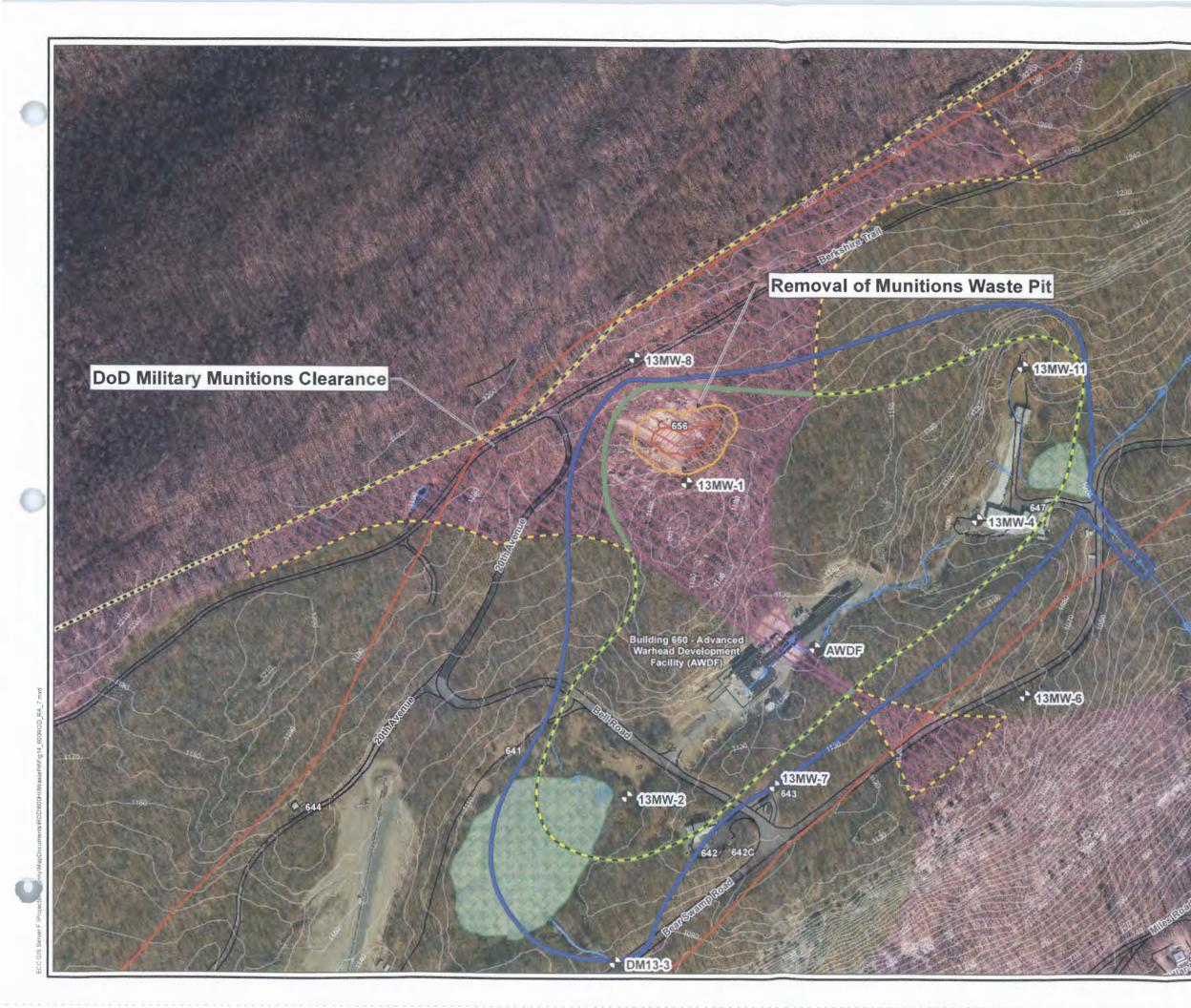






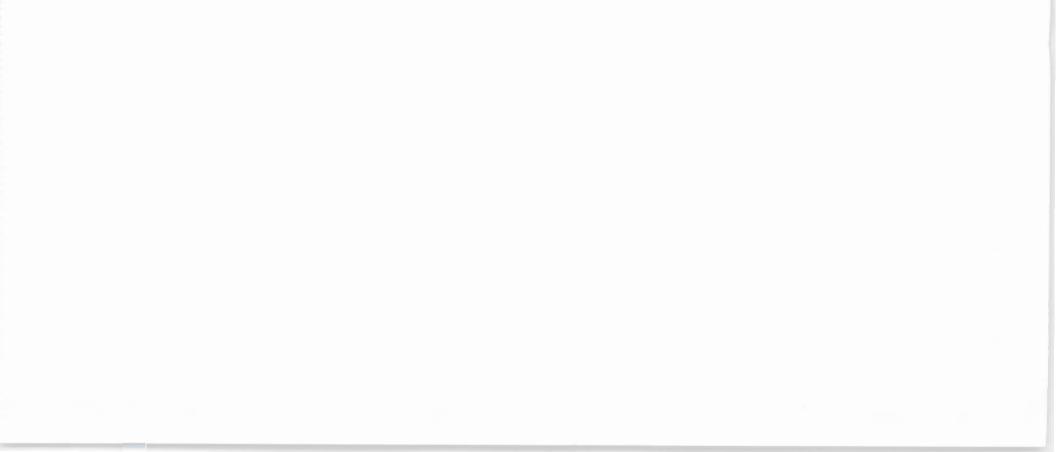
|  | The second second second second second |
|--|--|
|  |  |

| 14                                    |  |  |   |
|---------------------------------------|--|--|---|
| 1                                     |  |  | - |
|                                       | Legend   |  |   |
| 27                                    |  | Surface Water Monitoring Point   |   |
| 1230-                                 | •  | MNA Monitoring and Compliance Well   |   |
|                                       |  | Groundwater Land Use Control Area/Area of  |   |
|                                       |  | d Remedial Alternatives  |   |
|                                       |  | Excavation Area/No UXO Related LUC/Construction<br>Support Required (~60' x 120') (6,326 sq ft)  |   |
|                                       |  | Side Wall Cutback Area (~160' x 200') (25,432 sq ft)   |   |
| Real                                  |  | Site Boundary  |   |
| 1                                     |  | 2007 TCE Plume Boundary  |   |
|                                       |  | DoD Military Munitions Land Use<br>Controls/Construction Support   |   |
| Tor                                   |  | 500 Area   |   |
|                                       |  | Existing Building  |   |
|                                       | L  | Former Building  |   |
| A A A A A A A A A A A A A A A A A A A |  | Operational Range Areas  |   |
| X                                     |  | Picatinny Arsenal<br>Boundary  |   |
| J-                                    | 5  | Surface Contour (10 foot interval)   |   |
|                                       | m  | Stream   |   |
|                                       | 18.8   | Vetland  |   |
|                                       | 1. Map (<br>2. 2016<br>3. AWD)<br>4. PICA<br>5. MNA<br>6. LUC<br>7. sq ft<br>8. TCE<br>9. UXO<br>10. Figu<br>Report a<br>(PICA 5<br>11. The<br>Operation<br>Land Us<br>12. The<br>used as<br>currently | & SOURCES:<br>Coordinates: NAD83 State Plane New Jersey, US feet<br>aerial photograph provided by Picatinny Arsenal.<br>F = Advanced Warhead Development Facility<br>= Picatinny Arsenal<br>= Monitored Natural Attenuation<br>= Land Use Controls<br>= Square Feet<br>= Trichloroethene<br>= Unexploded Ordnance<br>tre adapted from Figure 10-4 of the 600 Area Data<br>and Feasibility Study 600 Area Groundwater Plume<br>8), Revision 3 (Shaw, 2013).<br>area where the TCE plume extent is within the Active<br>on Range Area is not included in the Groundwater<br>se Control Area.<br>AWDF well is an open borehole well that was formally<br>a non-potable well at Building 660; however, it is<br>y off-line and not in use. |   |
|                                       | 0  | 125 250 500 w  |   |
| 1/2                                   |  | Feet S   |   |
| -                                     |  | Figure 13<br>Remedial Alternative 5:<br>e Removal, Monitored Natural Attenuation<br>lishing and Land Use Controls, 600 Area  |   |
|                                       |  | 600 Hill Waste Pit Record of Decision<br>Picatinny Arsenal<br>Morris County, New Jersey  |   |
| and the second second                 |  |  | 1 |



| Lege  | nd  |  |  |  |  |
|---|---|--|--|--|--|
|   | MNA Monitoring and Compliance Well  |  |  |  |  |
|   |   |  |  |  |  |
| Propos  | Groundwater Land Use Control Area/Area of Attainment<br>ed Remedial Alternatives  |  |  |  |  |
| 777   | Excavation Area *   |  |  |  |  |
|   | Cutback Area (50' Buffer of Excavation Area)  |  |  |  |  |
|   | Site Boundary   |  |  |  |  |
|   | 2007 TCE Plume Boundary   |  |  |  |  |
|   | Surface and Subsurface Removal of DoD Military<br>Munitions/Land Use Controls/Construction Support  |  |  |  |  |
|   | 600 Area  |  |  |  |  |
|   | Operational Range Areas   |  |  |  |  |
| 100   | Picatinny Arsenal   |  |  |  |  |
|   | Existing Building   |  |  |  |  |
| <br>  | Former Building   |  |  |  |  |
| '   | Surface Contour (10 foot interval)  |  |  |  |  |
|   | Stream  |  |  |  |  |
|   | Wetland   |  |  |  |  |
| 2. 2016<br>3. * Exc<br>pit ident<br>4. ' = fer<br>5. AWD<br>6. PICA<br>7. MRS<br>8. DoD<br>9. TCE<br>10. Figu<br>Report<br>(PICA 5<br>11. The<br>Used as<br>current!<br>13. DoD<br>Support<br>periods<br>regards<br>14. The<br>to an av<br>anomali              | Coordinates: NAD83 State Plane New Jersey, US feet<br>aerial photograph provided by Picatinny Arsenal.<br>avation Area based on approximate location of waste<br>tiffied by Weston (2012).<br>et<br>F = Advanced Warhead Development Facility<br>= Picatinny Arsenal<br>= Munitions Response Site<br>= Department of Defense<br>= Trichloroethene<br>ure adapted from Figure 10-5 of the 600 Area Data<br>and Feasibility Study 600 Area Groundwater Plume<br>-8), Revision 3 (Shaw, 2013).<br>area where the TCE plume extent is within the Active<br>on Range Area is not included in the Groundwater<br>se Control Area.<br>AWDF well is an open borehole well that was formally<br>a non-potable well at Building 660; however, it is<br>y off-line and not in use.<br>Military Munitions Land Use Controls/Construction<br>are included in the remedy for two, five-year review<br>to document that the remedy remains protective with<br>to explosive hazards.<br>subsurface clearlance depth was assumed to extend<br>verage depth of 2 feet below ground surface; however,<br>ies will be removed to depth and may be found to<br>deeper than 2 feet in some areas. |  |  |  |  |
| 0   | 125 250 500   |  |  |  |  |
|   | Feet  |  |  |  |  |
| Figure 14<br>Remedial Alternative 7: Munitions Waste Pit Removal,<br>Monitored Natural Attenuation Polishing, Land<br>Use Controls and DoD Military Munitions Clearance<br>of Entire Munitions Response Site, 600 Area<br>600 Hill Waste Pit Record of Decision |   |  |  |  |  |
| <br>Picatinny Arsenal<br>Morris County, New Jersey  |   |  |  |  |  |

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Tables

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### LIST OF TABLES

| Number | Title  |
|--------|--|
| 1      | Chronology of Investigations at the 600 Area, Picatinny Arsenal, New Jersey  |
| 2      | Contaminant of Concern (COC) 600 Area Groundwater, Picatinny Arsenal,<br>New Jersey  |
| 3      | Existing Monitoring Well Construction Summary, 600 Hill Waste Pit, 600 Area Groundwater  |
| 4      | Chemical-Specific Groundwater Applicable or Relevant and Appropriate<br>Requirements and To Be Considered, 600 Area Groundwater, Picatinny<br>Arsenal, New Jersey          |
| 5      | Action-Specific Applicable or Relevant and Appropriate Requirements for 600<br>Hill Waste Pit, Picatinny Arsenal, New Jersey   |
| 6      | Location-Specific Applicable or Relevant and Appropriate Requirements for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey  |
| 7      | Summary of DoD Military Munitions and Munitions Debris Identified in June 2011 Source Area Investigation, 600 Hill Waste Pit, Picatinny Arsenal, New Jersey                |
| 8      | Summary of Estimated Risk and Hazards from 600 Area Groundwater, Surface Water and Vapor Intrusion from In-Situ Groundwater to Building 660, Picatinny Arsenal, New Jersey |
| 9      | Comparative Analysis of Remedial Alternatives for 600 Hill Waste Pit,<br>Picatinny Arsenal, New Jersey   |

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| ACTIVITY   | REPORT AUTHOR                  | DATE  |
|--|--------------------------------|-------|
| Facility-Wide  |                                |       |
| Site Investigation of Picatinny Arsenal, New Jersey Volume 1, Main Report and Appendices A through E   | Dames & Moore                  | 1989  |
| Remedial Investigation Concept Plan  | Argonne National<br>Laboratory | 1991  |
| Remedial Investigation Concept Plan for Picatinny Arsenal. Environmental Setting,<br>Applicable Regulations, Summaries of Site Sampling Plans, Sampling Priorities, and<br>Supporting Appendices, Volume 1   | Dames & Moore                  | 1991  |
| Site Investigation of Picatinny Arsenal, New Jersey, Volumes 1 and II  | Dames and Moore                | 1998  |
| Draft Final Picatinny Arsenal Phase II Ecological Risk Assessment  | IT Corporation                 | 2000  |
| Phase III-1A Human Health Risk Assessment Approach (Final)   | IT Corporation                 | 2001  |
| Picatinny Arsenal Facility-Wide Background Investigation   | IT Corporation                 | 2002  |
| 600 Area Groundwater   |                                |       |
| Final 600 Area Groundwater Remedial Investigation Work Plan  | Shaw Environmental, Inc.       | 2004  |
| 600 Area Work Plan Addendum  | Shaw Environmental, Inc.       | 2005a |
| Phase III and I 2A/3A Sites Ecological Risk Assessment   | Shaw Environmental, Inc.       | 2005b |
| 600 Area Groundwater Investigation Data Report   | Shaw Environmental, Inc.       | 2005c |
| Well Head Protection Plan (Final)  | Shaw Environmental, Inc.       | 2005d |
| 600 Area Groundwater Investigation – Supplemental Investigation Work Plan  | Shaw Environmental, Inc.       | 2006a |
| 600 Area Groundwater Investigation – Update on Additional Work   | Shaw Environmental, Inc.       | 2006b |
| 600 Area Groundwater Investigation – Pump Test Work Plan   | Shaw Environmental, Inc.       | 2007a |
| Facility-Wide  |                                |       |
| 600 Area Groundwater Investigation – Well Log and Isotope Data   | Shaw Environmental, Inc.       | 2007b |
| 600 Area Risk Assessment Revised Approach, email correspondence among Mr.<br>William Roach, USEPA Project Manager, Charles Nance, U.S. Environmental<br>Protection Agency Region 2 Toxicologist, and Mark Weisberg, Shaw Risk Assessor,<br>through Mr. Ted Gabel, Picatinny Arsenal Project Manager for Installation<br>Restoration, 30 June, 7 July, 24 July, and 13 August | Shaw Environmental, Inc.       | 2008  |
| Picatinny Arsenal Task Order 17 600 Area RDX Investigation Data Report, April  | Shaw Environmental, Inc.       | 2009  |
| 600 Area MTBE Groundwater Investigation Data Report  | Shaw Environmental, Inc.       | 2010a |
| 600 Area Work Plan for Vapor Intrusion and Source Area Investigation   | Shaw Environmental, Inc.       | 2010b |
| Building 660 Vapor Intrusion Investigation Report  | Shaw Environmental, Inc.       | 2011  |
| Final 600 Area Data Report and Feasibility Study, 600 Area Groundwater Plume (PICA-058), Volume I Report and Appendixes A through P, Final Revision 3  | Shaw Environmental, Inc.       | 2013  |
| Inactive Munitions Waste Pit Munitions Response  | Site                           |       |
| Executive Order 11508 Picatinny Arsenal Survey Report  | Dept. of Defense               | 1973  |
| Final Site Inspection  | Malcolm Pirnie, Inc.           | 2008  |
| Military Munitions Response Program Remedial Investigation   | Weston Solutions, Inc.         | 2012  |
| Final Remedial Investigation Report: Military Munitions Response Program<br>Remedial Investigation   | Weston Solutions, Inc.         | 2014  |

#### Table 1: Chronology of Investigations at the 600 Area, Picatinny Arsenal, New Jersey

Source: Final Feasibility Study (ECC, 2017) and Final Proposed Plan (Army, 2018).

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#### Table 2: Contaminant of Concern (COC) 600 Area Groundwater, Picatinny Arsenal, New Jersey

|                            | Historical Maximum                           |                | COC Screening Criteria              |                |                        |              |     |
|----------------------------|--|----------------|-------------------------------------|----------------|------------------------|--------------|-----|
| Chemical                   | Observed Concentration<br>600 Area<br>(µg/L) | ARAR<br>(µg/L) | Frequency of<br>ARAR<br>Exceedances | Above<br>ARAR? | Plume<br>Distribution? | Risk Driver? | сос |
| Volatile Organic Compounds |  |                |                                     |                |                        |              |     |
| Trichloroethene            | 210  | 1              | 67 / 124                            | Yes            | Yes                    | Yes          | Yes |

Notes:

µg/L = Microgram per liter

ARAR = Applicable or Relevant and Appropriate Requirement

COC = Contaminant of concern

Source: Modified Final FS (ECC, 2017).

| Well ID     | Well<br>Completion<br>Date  | Well<br>Design | Media   | Steel<br>Outer<br>Casing,<br>Diameter<br>(inches) | Casing<br>Depth,<br>(ft bgs) | Total<br>Depth<br>(ft) | PVC Screen<br>Size (inches) | Screen<br>length<br>(feet) | Screen<br>diameter<br>(inches) | Screened<br>Interval,<br>(ft. bgs) |
|-------------|---|----------------|---------|---|------------------------------|------------------------|-----------------------------|----------------------------|--------------------------------|------------------------------------|
| 13MW-1      | 4/13/2005   | Stick-up       | Bedrock | 8   | 26                           | 253                    | 0.020                       | 25                         | 4                              | 228-253                            |
| 13MW-2      | 4/13/2005   | Stick-up       | Bedrock | 8   | 36                           | 190                    | 0.020                       | 25                         | 4                              | 168-193                            |
| 13MW-3      | 4/13/2005   | Flush          | Bedrock | 6   | 19                           | 75                     | 0.020                       | 25                         | 2                              | 47-72                              |
| 13MW-4      | 4/13/2005   | Flush          | Bedrock | 8   | 19                           | 193                    | 0.020                       | 25                         | 4                              | 168-193                            |
| 13MW-5      | 7/5/2006  | Stick-up       | Bedrock | 8   | 20                           | 150                    | 0.010                       | 25                         | 4                              | 125-150                            |
| 13MW-6      | 7/18/2006   | Stick-up       | Bedrock | 8   | 16.5                         | 147                    | 0.010                       | 25                         | 4                              | 122-147                            |
| 13MW-7      | 7/18/2006   | Stick-up       | Bedrock | 8   | 17                           | 105                    | 0.010                       | 25                         | 4                              | 80-105                             |
| 13MW-8      | 7/18/2006   | Stick-up       | Bedrock | 8   | 17                           | 103                    | 0.010                       | 25                         | 4                              | 78-103                             |
| 13MW-9      | 7/10/2006   | Flush          | Bedrock | 6   | 20                           | 45                     | 0.010                       | 25                         | 2                              | 25-45                              |
| 13MW-10     | 2/26/2007   | Flush          | Bedrock | 6   | 17                           | 112.5                  | 0.010                       | 20                         | 2                              | 90-110                             |
| 13MW-11     | 2/26/2007   | Stick-up       | Bedrock | 6   | 14                           | 30                     | 0.010                       | 10                         | 2                              | 17.3-27.3                          |
| 13MW-12     | 2/26/2007   | Stick-up       | Bedrock | 6   | 12                           | 34                     | 0.010                       | 10                         | 2                              | 23-33                              |
| 13MW-13     | 2/26/2007   | Stick-up       | Bedrock | 6   | 17                           | 180                    | 0.010                       | 10                         | 2                              | 156-176                            |
| AWDF        | 6/3/1994  | Stick-up       | Bedrock | 6   | 40                           | 430                    | Open                        | NA                         | NA                             | NA                                 |
| MW-2_N      | 1/1/1981  | Stick-up       | Bedrock | 6   | 20                           | 48.5                   | 0.010                       | 10                         | 2                              | 38.5-48.5                          |
| DM13-1      | 3/7/1988  | Stick-up       | Bedrock | 6   | 2.5                          | 22                     | 0.020                       | 10                         | 4                              | 12-22                              |
| DM13-2      | 2/25/1988   | Stick-up       | Bedrock | 6   | 2.5                          | 18                     | 0.020                       | 10                         | 4                              | 8-18                               |
| DM13-3      | 2/26/1988   | Stick-up       | Bedrock | 6   | 2.5                          | 27                     | 0.020                       | 10                         | 4                              | 17-27                              |
| DM10-1      | 3/1/1988  | Stick-up       | Bedrock | 8   | 2.5                          | 45                     | 0.020                       | 10                         | 4                              | 35-45                              |
| DM10-2      | 2/26/1988   | Stick-up       | Bedrock | 8   | 2.5                          | 33                     | 0.020                       | 10                         | 4                              | 25-35                              |
| Source: 600 | Source: 600 Area Data Report/Feasibility Study Picatinny, New Jersey (Shaw 2013) and the Picatinny Geographic Information System (GIS) Database.<br>Final Document, Revision #3 |                |         |   |                              |                        |                             |                            |                                |                                    |

# Table 3: Existing Monitoring Well Construction Summary, 600 Hill Waste Pit, 600 Area Groundwater, Picatinny Arsenal, New Jersey

Notes

bgs – below ground surface

Ft – feet

NA – not applicable

### Table 4: Chemical-Specific Groundwater Applicable or Relevant and Appropriate Requirements and To Be Considered, 600 Area Groundwater, Picatinny Arsenal, New Jersey

| Media/Chemical                      | Requirement   | Requirement Synopsis   | Status |
|-------------------------------------|---|--|--------|
|                                     | Safe Drinking Water Act Maximum Contaminant<br>Levels, 40 CFR 141.61 through 141.62   | Maximum Contaminant Levels have been promulgated and regulate contaminants in public drinking water.                 | ARAR   |
|                                     | New Jersey Safe Drinking Water Act State<br>Maximum Contaminant Levels, N.J.A.C. 7:10-5.2<br>through 5.4  | Maximum Contaminant Levels have been promulgated by the State<br>and regulate contaminants in public drinking water. | ARAR   |
| Groundwater/TCE                     | New Jersey Groundwater Quality Standards,<br>N.J.A.C. 7:9C-1.7 and Table 1  | Groundwater quality standards have been promulgated and regulate contaminants in groundwater <sup>(1)</sup> .        | ARAR   |
| (See <b>Table 2)</b> <sup>[1]</sup> | New Jersey Site Remediation Program. Introduction<br>to Site-Specific Impact to Groundwater Soil<br>Remediation Standards Guidance Document,<br>December 2008 | Guidance on developing site-specific soil standards for the protection of groundwater.                               | ТВС    |
|                                     | Safe Drinking Water Act Maximum Contaminant<br>Level Goals, 40 CFR 141.50 through 141.51  | Promulgated health-based goals for drinking water sources.   | ARAR   |
|                                     | New Jersey Administrative Code NJAC 7:8,<br>Subchapter 5, 5.3 through 5.9   | Design and performance standards for stormwater management measures  | ARAR   |

Notes:

ARAR = Applicable or relevant and appropriate requirements

CFR = Code of Federal Regulations

N.J.A.C. = New Jersey Administrative Code

TCE = Trichloroethene

TBC = To Be Considered

 Note that TCE is the only chemical in groundwater for which a chemical-specific ARAR (1 μg/L) has been established based on the NJDEP Groundwater Quality Standards.

Source: Modified from Final FS (ECC, 2017).

# Table 5: Action-Specific Applicable or Relevant and Appropriate Requirements for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey

| Action   | Requirement  | Requirement Synopsis  | Status |  |
|--|--|---|--------|--|
|  | Technical Requirements for Site<br>Remediation N.J.A.C. 7:26E-5.1(d)3  | Specifies that remediation must not cause an uncontrolled discharge or transfer of contaminants to<br>another media. Requirement is substantive because it specified a standard of control for onsite remedial<br>action.   | ARAR   |  |
|  | Technical Requirements for Site<br>Remediation N.J.A.C. 7:26E-5.1(e)   | Requires that remediation must remove free product and residual product to the extent practicable or<br>contain free product and residual product when treatment or removal is not practicable. Requirement is<br>substantive because it provides a standard of control related to protectiveness of the onsite action                      | ARAR   |  |
| General  | Technical Requirements for Site Remediation<br>N.J.A.C. 7:26E- 1.5 (h)   | Excavated soil or drill cuttings may be returned to the original location provided neither free product nor residual product is present. Requirement is substantive because it provides a standard of control related to protectiveness of the onsite action.   |        |  |
| Remediation and<br>Institutional<br>Controls             | Technical Requirements for Site Remediation<br>N.J.A.C. 7:26E 5.2 (b) through (f)                                      | pecifies the requirements for using alternative fill from an onsite or offsite source for backfilling<br>xcavations. Specifies the requirements for utilizing clean fill for backfill allowable ing excavations.<br>equirement is substantive because it dictates constituent levels for the fill material allowable for use as<br>ackfill. |        |  |
|  | Technical Requirements for Site<br>Remediation N.J.A.C. 7:26E-4.2  | Specifies requirements of soil excavation, confirmatory and quality assurance sampling and analysis at<br>remediation sites.  |        |  |
|  | Well Construction and Maintenance; Sealing<br>of Abandoned Wells N.J.A.C 7:9D,<br>Subchapters 2 and 3                  | Technical requirements for the installation and abandonment of monitoring wells.  | ARAR   |  |
|  | New Jersey Pollutant Discharge Elimination<br>System (NJPDES) Discharge to Groundwater<br>Technical Manual (June 2007) | Provides on guidance on discharge of groundwater into surface water features.   | твс    |  |
| Management of<br>Military Munitions                      | RCRA, Subpart M (Military Munitions Rule). 40<br>CFR 266 (203 through 206)   | Provide relevant standards on the management of any recovered military munitions, including standards applicable for transportation of military munitions (40 CFR 266.203), emergency responses (40 CFR 266.205), storage (40 CFR 266.205) and treatment (40 CFR 266.206), as applicable.   | ARAR   |  |
| Discharge of<br>Aqueous Waste to<br>Surface Water        | Clean Water Act Effluent Guidelines<br>40 CFR 401. 13; 401.15; 401.16; and 401.17                                      | Provides requirements for point source (a pipe, ditch, or channel) discharges of pollutants to surface<br>water (or wetlands), where applicable.<br>Requirement is substantive because it specifies the level or standard of control for potential discharge of<br>stormwater resulting from the implementation of the selected remedy.     |        |  |
| Discharge of<br>Aqueous Waste to<br>Surface Water        | New Jersey Pollutant Discharge Elimination<br>System (NJPDES) (N.J.A.C. 7:14A- Subchapter<br>12)                       | Stormwater discharges into surface water from remediation sites is regulated via New Jersey Pollutant<br>Discharge Elimination System requirements.   |        |  |
| Packaging, Labeling<br>and Storage of<br>Hazardous Waste | RCRA Hazardous Waste Generation<br>40 CFR 262, Subpart C (Subchapters §262.30<br>- §262.33)                            | Specifies standards applicable to generators of hazardous waste, including the pre-transport requirements (packaging, labeling, marking, and placarding).   |        |  |

#### Table 5: Action-Specific Applicable or Relevant and Appropriate Requirements for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey (continued)

| Action                      | Requirement                                 | Requirement Synopsis  |     |  |  |
|-----------------------------|---|---|-----|--|--|
| Hazardous Waste             | RCRA Hazardous Waste                        | Requires the determination of whether a generated solid waste is a hazardous waste and specifies<br>citations for exclusions, lists of hazardous wastes, and testing for determination. |     |  |  |
| Disposal                    | Determination 40 CFR §262.11                |   |     |  |  |
|                             | Standards for Soil Erosion and Sediment     |   |     |  |  |
|                             | Control in New Jersey (New Jersey           | Vegetative and engineering standards for control soil and sediment erosion applicable during  | TBC |  |  |
| Deveeding                   | Department of Agriculture, State Soil       | excavation.   |     |  |  |
| Remedial                    | Conservation Committee January 2014)        |   |     |  |  |
| excavation/<br>construction | Agriculture State Soil Conservation         | Specifies management of soil erosion and sediment control for engaging in clearing or grading of more   |     |  |  |
|                             | Committee Soil Erosion and Sediment Control | than 5,000 square feet of land, unless such land disturbance is for agricultural or horticultural purposes.   | TBC |  |  |
|                             | Act Rules (N.J. A. C. 2:90-1.8) Clearing or | Implemented by the Department of Agriculture (NJDA) and the state's soil conservation districts. These standards are applicable during the clearing and excavation activites.           |     |  |  |
|                             | grading of land.                            |   |     |  |  |

Notes:

ARAR = Applicable or Relevant and Appropriate Requirement

CFR = Code of Federal Regulations

NESHAPS = National Emission Standards for Hazardous Air Pollutants

N.J.A.C. = New Jersey Administrative Code

NJDEP = New Jersey Department of Environmental Protection

NJPDES = New Jersey Pollutant Discharge Elimination System

RCRA = Resource Conservation and Recovery Act

Source: Modified from Final FS (ECC, 2017).

## Table 6: Location-Specific Applicable or Relevant and Appropriate Requirements for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey

| Location | Requirement                  | Requirement Synopsis                                    | Status |
|----------|------------------------------|---|--------|
| Wetlands | Clean Water Act, Section 402 | Section 402 of the Clean Water Act which regulates      | ARAR   |
|          |                              | construction sites on an acre or greater of land, as    |        |
|          |                              | well as municipal, industrial and commercial facilities |        |
|          |                              | discharging wastewater or stormwater directly from      |        |
|          |                              | a point source into a surface water feature (such as a  |        |
|          |                              | stream, waterbody or wetland). No impacts are           |        |
|          |                              | anticipated to any wetland area for the                 |        |
|          |                              | implementation of the selected remedy. Actions will     |        |
|          |                              | be taken to avoid degradation or destruction of         |        |
|          |                              | wetlands, and wetland transition zones, in the 600      |        |
|          |                              | Area during the remedial activities required for        |        |
|          |                              | implementation of the selected remedy.                  |        |

Notes:

ARAR = Applicable or relevant and appropriate requirement.

Source: Modified from Final FS (ECC, 2017).

### Table 7: Summary of DoD Military Munitions and Munitions Debris Identified in June 2011 Source Area Investigation,600 Hill Waste Pit, Picatinny Arsenal, New Jersey

| Description  | Quantity Test Pit/Trench Location |   | Comments  |  |  |  |  |  |
|--|-----------------------------------|---|---|--|--|--|--|--|
| Munitions Debris   |                                   |   |   |  |  |  |  |  |
| Cartridge, Photoflash: practice, M121, Expended  | 1                                 | TP-2, approximately 8 feet below<br>ground surface            |   |  |  |  |  |  |
| M72 Rocket Launcher for 66-millimeter Rocket (light anti-tank weapon), Empty – no sights | 13                                | TP-2, approximately 10-12 feet<br>below ground surface        | 3 sights were discovered, collected, and tested by Picatinny Radiation<br>Protection Office – not radiologically contaminated |  |  |  |  |  |
| XM31 Anti-Tank Land Mine, Expended   | 1                                 | TP-2  | Item recovered from within garbage can removed from TP-2  |  |  |  |  |  |
| 155-Millimeter Fragment (ogive)  | 1                                 | TP-2  | Item recovered from within garbage can removed from TP-2  |  |  |  |  |  |
| Aircraft Flare, MK45, Expended   | 1                                 | TR2*  |   |  |  |  |  |  |
| PD Fuze, Expended  | 1                                 | TR2*  | Photograph shows 2 pieces/ components of fuze   |  |  |  |  |  |
| BLU 3/B plate, CDU-10 canister cover   | 1                                 | TR2*  |   |  |  |  |  |  |
| BLU 39/B Skitters, CN/CS Tear Gas, Inert   | 3                                 | TR2*  |   |  |  |  |  |  |
| 40-Millimeter Grenade Cartridge Cases, Expended  | 7                                 | TR2*  |   |  |  |  |  |  |
| Electric Blasting Cap, Expended  | 1                                 | TR2*  |   |  |  |  |  |  |
| Fuzes M48, M51, M81 Series, M557 Series, and M572  | 12                                | TR2   | Several fuzes recovered folded into the side of a crushed drum  |  |  |  |  |  |
|  |                                   | Munitions and Explosives of Concern                           |   |  |  |  |  |  |
| CDU-10 (T-1)/B Canister with XM39E and XM44  | 1                                 | TR2, East End, approximately<br>4.5 feet below ground surface | Munitions and explosives of concern data sheet references approximately 680 XM40E5 and 48 XM44 mines per CDU-10/B             |  |  |  |  |  |

Notes:

No munitions debris discovered in TP1.

\*TR2 trench offset 8 feet to the south due to concentration of munitions debris encountered at initial location. Locations noted with an asterisk (TR2\*) refer to the location prior to the offset. Excavation of TR2 ceased upon encountering unexploded ordnance.

Source: Final FS (ECC, 2017) and Final PP (Army, 2018).

CN = Chloracetophenone

CS = o-Chlorobenzylidenemalononitrile

TP = Test Pit

TR = Test Trench

### Table 8: Summary of Estimated Risk and Hazards from 600 Area Groundwater, Surface Water and Vapor Intrusion from In-Situ Groundwater to Building 660, Picatinny Arsenal, New Jersey

| Receptor<br>(Future)   | Est. Totał Cancer Risk (RME)                                 | Cancer Risk Drivers                           | Pathway<br>Contributing to Risk |  |
|--|--|---|---------------------------------|--|
| Industrial Research Worker                                     | 1.1E-05  | TCE, PCE                                      | Ingestion                       |  |
| Construction Excavation Worker                                 | 2.2E-08  | None (Cancer Risk <1E-06)                     |                                 |  |
| Receptor<br>(Future)   | Est. Total Non-Cancer Hazard (RME)                           | Non-cancer Hazard Drivers                     | Not Applicable                  |  |
| Industrial Research Worker                                     | 0.005  | None (HI<1)                                   |                                 |  |
| Construction Excavation Worker                                 | 0.0001   | None (HI<1)                                   |                                 |  |
|  |  | None (Cancer Bisk <15-06)                     | Contributing to Risk            |  |
| Receptor<br>(Current and Future)<br>Industrial Research Worker | Est. Total Cancer Risk (RME)                                 | Cancer Risk Drivers None (Cancer Risk <1E-06) | Pathway<br>Contributing to Risk |  |
| Receptor<br>(Current and Future)                               | Est. Total Non-Cancer Hazard (RME) Non-cancer Hazard Drivers |   | Not Applicable                  |  |
| Industrial Research Worker                                     | 0.000009   | None (HI<1)                                   |                                 |  |
|  | Vapor Intrusion from In-Situ Groundwate                      | er (Building 660)                             |                                 |  |
| Receptor<br>(Current and Future)                               | Est. Total Cancer Risk (RME)                                 | Cancer Risk Drivers                           | Pathway<br>Contributing to Risk |  |
| Industrial Research Worker                                     | 6.3E-06  | TCE   | Indoor Air (inhalation          |  |
| Receptor   | Est. Total Non-Cancer Hazard (RME)                           | Non-cancer Hazard Drivers                     | Pathway                         |  |
| (Current and Future)   |  | Non cancer nazara brivers                     | Contributing to Risk            |  |

Source: Modified from Final FS (ECC, 2017) and Final PP (Army, 2018).

Notes:

HI = Hazard Index

TCE = Trichloroethene

PCE = Tetrachloroethene

RME = Reasonable Maximum Exposure

No Human Health Risk Assessment was conducted for soil or sediment since the sampling results indicated no contaminants of potential concern were identified and no contaminants exceeded the human health screening criteria.

| Screening Criterion   | Alternative<br>1<br>No Action | Alternative 2<br>MNA, LUCs, | Alternative 3<br>In-Situ Chemical<br>Oxidation, MNA<br>Polishing, LUCs | Alternative 4<br>In-Situ Enhanced<br>Anaerobic<br>Bioremediation, MNA<br>Polishing, LUCs | Alternative 5<br>TCE Source<br>Material<br>Removal, MNA<br>Polishing, LUCs | Alternative 6<br>Total Munitions<br>Waste Pit Removal,<br>TCE Source Material<br>Removal, MNA<br>Polishing, LUCs | Alternative 7<br>Total Munitions Waste Pit Removal,<br>TCE Source Material Removal, MNA<br>Polishing, LUCs, MEC Clearance of<br>Entire MRS (Achieving Unlimited<br>Use/ Unrestricted Exposure Criteria) |  |
|---|-------------------------------|-----------------------------|--|--|--|--|---|--|
|   |                               |                             |  | Threshold Criteria   |  |  |   |  |
| Protection of human<br>health and the<br>environment              | 0                             | •                           | •  | •  | •  | •  | •   |  |
| Compliance with ARARs   | 0                             | •                           | •  | •  | •  | •  | •   |  |
|   |                               |                             |  | Balancing Criteria   |  |  |   |  |
| Long-term effectiveness<br>and permanence                         | 0                             | 0                           | 0  | 0  | 0  | 0  | •   |  |
| Reduction of toxicity,<br>mobility or volume<br>through treatment | 0                             | 0                           | 0  | 0  | 0  | 0  | •   |  |
| Short-term<br>effectiveness                                       | 0                             | 0                           | 0  | 0  | 0  | 0  | 0   |  |
| Implementability  | •                             | •                           | 0  | 0  | 0  | 0  | 0   |  |
| Costs <sup>(a)</sup>  | \$0                           | \$674,505                   | \$1,470,313  | \$1,608,008  | \$2,127,311  | \$3,310,431 <sup>(b)</sup>   | \$4,119,380   |  |
| Modifying Criteria <sup>(c)</sup>                                 |                               |                             |  |  |  |  |   |  |
| State Acceptance  | TBD                           | TBD                         | TBD  | TBD  | TBD  | TBD  | TBD   |  |
| Community Acceptance  | TBD                           | TBD                         | TBD  | TBD  | TBD  | TBD  | TBD   |  |

#### Table 9: Comparative Analysis of Remedial Alternatives for 600 Hill Waste Pit, Picatinny Arsenal, New Jersey

Notes:

Favorable (Yes for threshold criteria)

O Moderately Favorable.

O Not Favorable (no for threshold criteria).

a. Costs (shown in this table as the total present worth costs) are detailed in Appendix C of Final FS (ECC, 2017).

b. The cost for **Alternative 6** in this Table was modified from the cost presented in the Final FS (ECC, 2017) by an additional \$36,390 to include the addition of a carbon substrate amendment to the excavation. The cost was also presented in the Final PP (Army, 2018).

c. The Modifying criteria of regulator and community acceptance are To Be Determined following review and input from these parties.

Source: Modified from Final FS, Table 7-3 (ECC, 2017).

ARAR = Applicable or relevant and appropriate requirement

LUC = Land use control

MEC = Munitions and explosives of concern

MNA = Monitored natural attenuation

MRS = Munitions response site

TBD = To Be Determined

TCE = Trichloroethene

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Appendix A NJDEP and USEPA Proposed Plan Concurrence Letters This page intentionally left blank.



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION Site Remediation and Waste Management Program 401 E. State Street PO Box 420, Mail Code 401-06 Trenton, New Jersey 08625 Tel: (609) 292-1250 Fax: (609) 777-1914

CATHERINE R. McCABE Commissioner

Mr. Ted Gabel U.S. Army Garrison-Picatinny Arsenal ATTN: IMPI-PW-E/Building 319 Picatinny, NJ 07806-5000

July 9, 2018

RE: Picatinny Arsenal - 600 Hill Waste Pit Proposed Plan

Dear Mr. Gabel:

The New Jersey Department of Environmental Protection (Department) has completed its review of the Proposed Plan for the Picatinny Arsenal - 600 Hill Waste Pit (600 Hill Groundwater Plume [PICA-058/SITE 12] and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01]) and concurs with the preferred alternative. The preferred alternative, which is Alternative 6 in the Proposed Plan, consists of the following:

- Total Munitions Waste Pit Removal, TCE Source Material Soils Removal, Monitored Natural Attenuation (MNA) Polishing, and Land Use Controls (LUCs).
- Military munitions and munitions debris (MD) will be removed in the 0.24-acre Munitions Waste Pit however, military munitions and MD may be potentially present in the remaining uncleared areas of the Munitions Response Site area (20.76 acres). LUCs will include fencing, signage and PICA safety and intrusive-activity programs.

The Department looks forward to working with the Army-PICA and EPA on the issuance of the Record of Decision and remediation of the Picatinny Arsenal – 600 Hill Waste Pit.

Sincerel

J. Pedersen Mark Assistant Commissioner

The State of New Jersey is an equal opportunity employer. Printed on recycled and recyclable paper.

PHILIP D. MURPHY Governor

SHEILA Y. OLIVER Lt. Governor This page intentionally left blank.

### Army Response to Follow-Up NJDEP Comment on Draft Proposed Plan

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### Follow-up NJDEP Comment on Draft Proposed Plan for 600 Hill Waste Pit (600 HILL Groundwater Plume [PICA-058/Site 12] and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01]) Picatinny Arsenal, New Jersey Submitted: February 6, 2018

Comment provided by Joe Marchesani, NJDEP on April 26, 2018 letter. Responses will be incorporated in the Final PP text in RLSO.

#### **General Comment**

A 6- inch diameter 430-foot-deep potable supply well was drilled in 1994 to provide water to the new building 660. Sampling of groundwater in the well indicated TCE contamination above NJDEP criteria. Subsequent investigations and sampling indicated MTBE and RDX contamination; however, it is not above applicable criteria. The source area for the TCE is identified as the inactive waste pit, containing at least one buried drum of TCE along with unexploded ordinance/ military munitions hazards.

The preferred remedy for the groundwater TCE contamination is *Alternative 6- Total Munitions Waste Pit Removal, TCE source Material Removal, MNA polishing and Land Use Controls.* The excavation would then be backfilled with clean fill. The remedial timeframe is listed as reasonable. Reasonable is explained in the report as less than 50 years.

Army Response: No response required.

**NJDEP Specific Comment** - The report is approvable. Picatinny should investigate modifying the clean backfill (if the water table is encountered) with amendments (to promote microbial degradation) across the water table which will help reduce the remedial timeframe. A permit by rule equivalent would be required to backfill with amendments with discharge to the water table.

**Army Response**: Following the excavation of the total munitions waste pit, including the TCEcontaminated source soil, a carbon substrate amendment will be added to the excavation to enhance degradation of any residual contamination in the source area and the excavation will then be backfilled with clean fill to restore existing site contours. The carbon substrate application language has been added to the PP under the description of Alternative 6, similar to the description under Alternative 5 in the SUMMARY OF REMEDIAL ALTERNATIVES section. The quantity of EVO will also be assumed to be the same as that for Alternative 5, and the cost in Table 10 for Alternative 6 has been updated to include the amendment application, with a note added to clarify this change from the FS cost. A discharge permit equivalent will be obtained, as noted in the comment.

Follow-up NJDEP Comment on Draft Proposed Plan for 600 Hill Waste Pit (600 Hill Groundwater Plume [PICA-058/Site 12] and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01]) Picatinny Arsenal, New Jersey Submitted: February 6, 2018 April 26, 2018 Page 1 of 1



REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

### AUG 1 3 2018

LTC Samuel W. Morgan III Garrison Commander U.S. Army TACOM-ARDEC Picatinny, New Jersey 07806-5000

Re: Final Proposed Plan for 600 Hill Waste Pit (600 Hill Groundwater Plume [PICA-058/Site 12] and Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01]) Picatinny Arsenal, New Jersey

Dear LTC Morgan:

The purpose of this letter is to notify the Army that the U.S. Environmental Protection Agency (EPA) has reviewed the Proposed Remedial Action Plan (PRAP) dated July 2018, for the 600 Hill Groundwater Plume [PICA-058/Site 12] and the Inactive Munitions Waste Pit, Munitions Response Site [PICA-013-R-01], at Picatinny Arsenal, a federal facility listed on the National Priorities List. The PRAP proposes a response action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §9601 *et seq.*, and by this letter I am notifying the Army that EPA concurs with the release of the PRAP for public review and comment.

The proposed preferred remedial action for these sites is Alternative 6 – Total Munitions Waste Pit Removal, TCE Source Material Removal, Monitored Natural Attenuation (MNA) Polishing, and Land Use Controls. The proposed preferred remedial action includes the following measures:

- Excavation and off-site disposal of the entire 0.24-acre Munitions Waste Pit, including the TCEcontaminated source area soil (an estimated 9,526 cubic yards of material). The alternative would involve confirmatory soil sampling of the limits of excavation, followed by backfilling with clean fill.
- MNA of groundwater and surface water is included, and would continue until the TCE groundwater concentration is at or below the New Jersey Department of Environmental Protection Groundwater Quality Standard (GWQS) of 1 µg/L, with an expected timeframe of eight years to achieve this level.
- Removal of all military munitions and munitions debris (MD) from the 0.24-acre Munitions Waste Pit, to reduce explosive hazards at the site.
- Implementation of Land Use Controls (LUCs) to control access to the site, and completion of CERCLA Five Year Reviews to ensure the remedy remains protective.

This preferred alternative will protect human health and the environment, and achieve the Remedial Action Objectives developed for the site, by preventing exposure to TCE-contaminated groundwater, restoring groundwater to the cleanup goal through monitored natural attenuation, and addressing potential explosive hazards through removal of the Inactive Munitions Waste Pit and implementation of LUCs.

EPA understands that the Army will release the PRAP to the public and arrange for publication of a notice of availability of the PRAP for public comment as provided in Section 117 of CERCLA. EPA will make a final determination on the selection of the final remedy after the close of the public comment period, when we have completed our review of the comments, the response to the comments, and the draft Record of Decision.

If you have any questions regarding the subject of this letter, please contact me at 212-637-4380 or your staff may contact Sharon Hartzell, EPA Project Manager, at 212-637-4132.

Sincerely,

John Prince, Acting Director Emergency and Remedial Response Division

cc: M. Pedersen, New Jersey Department of Environmental Protection

Appendix B Mid-Valley Groundwater Dispute Resolution Letter (July 2009)



JUL - 6 2009

LTC John P. Stack Garrison Commander Bldg. 176, Buffington Road Garrison Headquarters Picatinny Arsenal, NJ 07806-5000

Dear LTC Stack,

EPA is pleased to inform the Army that the formal dispute raised by EPA over the Mid-Valley Groundwater Feasibility Study (FS) is over. EPA originally invoked dispute resolution over the FS due to our different approaches in addressing contaminated groundwater and surface water. Since the meeting of the Dispute Resolution Committee held on July 24, 2008 our respective staffs have worked on compromise language in the FS that would be satisfactory to both parties. Compromise language for the FS was approved by EPA in an April 15, 2009 e-mail from Ms. Carpenter, Chief, Special Projects Branch to Mr. Daniels, Chief of Cleanup Division of the Army Environmental Command and a revised FS containing those revisions was received by this office on May 12, 2009. That being the case, EPA approves the Mid-Valley Groundwater FS and looks forward to the implementation of the remedy.

I would like to thank our respective staffs for working diligently to resolve this dispute and would also call on them to work in such a cooperative fashion in the future. If you have any questions regarding this matter you may call me at (212) 637- 4405.

Sincerely yours,

Mu & Javadal

John LaPadula, Deputy Director Emergency and Remedial Response Division

cc: I. Kropp, NJDEP

**Appendix C Certificates of Publication for Public Notices** 



## Star Ledger

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MEDINAH JONES being duly sworn, deposes that he/she is principal clerk of NJ Advance Media; that Star Ledger is a public newspaper, with general circulation in Atlantic, Burlington, Cape May, Essex, Hudson, Hunterdon, Mercer, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex, Union, and Warren Counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s): Star Ledger 09/10/2018

Principal Clerk of the Publisher

Swom to and subscribed before me this 4th day of October 2018

Notary Public

## PUBLIC NOTICE U.S. ARMY INVITES PUBLIC COMMENT ON PROPOSED PLAN FOR 600 HILL WASTE PIT

#### **PROPOSED PLAN FOR 600 HILL WASTE PIT**

The US Army's Environmental Program at Picatinny Arsenal invites public comment on a Proposed Plan for the 600 Hill Waste Pit which includes the 600 Hill Groundwater Plume, and the Inactive Munitions Waste Pit. The 600 Hill Groundwater Plume covers the approximately 26 acres of solvent-impacted groundwater in the vicinity of the Advanced Warhead Development Facility. The Inactive Munitions Waste Pit is a 21-acre area located between two operational ranges. Extensive environmental studies and sampling have been conducted at the 600 Hill sites.

The Army evaluated seven alternatives for addressing the sites including no action (as required by law), monitored natural attenuation and land use controls, in-situ chemical oxidation, in-situ enhanced anaerobic bioremediation, source material removal, and various combinations of these remedies. The Army's preferred response is: Total Munitions Waste Pit Removal, TCE (a solvent) Source Material Removal, Monitored Natural Attenuation Polishing, and Land Use Controls. The cost of the preferred response is \$3,274,041

#### **Proposed Plan Public Meeting**

The Army invites the public to attend a meeting on Wednesday, September 26, 2018, 6:30 p.m., Homewood Suites, 2 Commerce Center Drive, Dover, NJ, 07801 (near the Rockaway Townsquare Mall). The meeting location is wheelchair accessible.

#### Written Comments

Copies of the Feasibility Study, Remedial Investigations, and the Proposed Plan for 600 Hill Waste Pit are available for public review at the Environmental Affairs Directorate at Picatinny by contacting Mr. Ted Gabel at (973) 724-6748 or ted.b.gabel.civ@mail.mil in advance. A copy of the Proposed Plan and the PDF version of the Feasibility Study for these sites is available for review at the Rockaway Township Library (61 Mount Hope Road) and Morris County Library (30 East Hanover Avenue, Whippany). In addition, you can have the Proposed Plan emailed to you by contacting Mr. Ted Gabel by email.

### AFFIDAVIT OF PUBLICATION

### Publisher's Fee \$47.30 Affidavit \$35.00

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Of the **Daily Record**, a newspaper printed in Freehold. New Jersey and published in Parsippany. in said County and State, and of general circulation in said county, who being duly sworn, deposeth and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper I times, once in each issue as follows:

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#### OTHER HEADINGS

#### PUBLIC NOTICE

#### U.S. ARMY INVITES PUBLIC COMMENT ON PROPOSED PLAN FOR 600 HILL WASTE PIT

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The US Army's Environmental Program at Picatinny Arsenal invites public comment on a Proposed Plan for the 600 Hill Waste Pit which includes the 600 Hill Groundwater Plume, and the Inactive Munitions Waste Pit. The 600 Hill Groundwater Plume covers the approximately 26 acres of solvent-impacted groundwater in the vicinity of the Advanced Warhead Development Facility. The Inactive Munitions Waste Pit is a 21-acre area located between two operational ranges. Extensive environmental studies and sampling have been conducted at the 600 Hill sites.

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The public may submit written comments during the 30-day comment period (September 26 to October 25, 2018). Comments must be postmarked by October 25. 2018 and sent to Mr. Ted Gabel, U.S. Army Garrison, Picatinny Arsenal, IMPI-PWE, Building 319, Picatinny Arsenal, NJ, 07806-5000 or by email to ted.b.gabel.civ@mail.mil (\$47,30)

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Appendix D Cost Comparison Summary for Remedial Alternatives Evaluated and Detailed Cost Tables

(Source: ECC, 2017 [Appendix C in Final FS])

| Alternative | Description  | Capital Cost               | Discounted O&M | Total Present Worth        |
|-------------|--|----------------------------|----------------|----------------------------|
|             | 600 Hill Was   | ste Pit, 600 Are           | a              |                            |
| 1           | No Action  | \$0.00                     | \$0.00         | \$0.00                     |
| 2           | Monitored Natural Attenuation and Land Use<br>Controls   | \$71,600                   | \$602,905      | \$674,505                  |
| 3           | In Situ Chemical Oxidation, Monitored Natural Attenuation Polishing and Land Use Controls  | \$451,412                  | \$1,018,902    | \$1,470,313                |
| 4           | In Situ Enhanced Anaerobic Bioremediation,<br>Monitored Natural Attenuation Polishing and<br>Land Use Controls   | \$622,326                  | \$985,682      | \$1,608,008                |
| 5           | Trichloroethene Source Removal, Monitored<br>Natural Attenuation Polishing and Land Use<br>Controls  | \$1,525,182                | \$602,129      | \$2,127,311                |
| 6           | Total Munitions Waste Pit Removal,<br>Trichloroethene Source Material Removal,<br>Monitored Natural Attenuation Polishing and<br>Land Use Controls   | \$2,708,303 <sup>(a)</sup> | \$602,128      | \$3,310,431 <sup>(a)</sup> |
| 7           | Total Munitions Waste Pit Removal,<br>Trichloroethene Source Material Removal,<br>Monitored Natural Attenuation Polishing, Land<br>Use Controls and Munitions and Explosives of<br>Concern Clearance of Entire Munitions<br>Response Site (to achieve the Unlimited<br>Use/Unrestricted Exposure Criteria) | \$3,787,256                | \$332,124      | \$4,119,380                |

### Table ES-1 Summary of Group 1 Alternatives Analysis

Notes:

a. The cost for Alternative 6 has been modified from the cost presented in the Final FS (ECC, 2017) by an additional \$36,390 to include the addition of a carbon substrate amendment to the excavation, as included for Alternative 5 in the Final FS.

Alternative 2 involves MNA and the maintenance and enforcement of ICs, in particular the restrictions of groundwater uses, intrusive activities and long-term groundwater monitoring for all parameters that exceeded the SCLs. It is assumed that ICs and the long-term groundwater monitoring would be performed for 50 years. The anticipated length of MNA will be reevaluated following review of the groundwater sampling results, and reevaluation of site-specific attenuation rates. This alternative also includes the requirement for UXO Construction Support, Annual Inspections, maintenance and reporting for monitoring of Land Use.

#### CAPITAL COSTS

#### 1.0 Land Use Control Implementation Plan

#### 2.0

Land Use Restrictions: A site-specific Land Use Control Implementation Plan (LUCIP) will need to be written in order to place restrictions on activities that can be performed in areas of the plumes at the 600 Area Sites and within the Inactive Munitions Waste Pit MRS. These restrictions can be enforced through existing institutional controls and by restricting future land use. The land use restrictions will ensure that potential receptors are not exposed to contaminated groundwater from the 600 Area plumes or exposed to MEC hazards.

| Description                                | Unit Rate       | Number of units | Cost    |
|--|-----------------|-----------------|---------|
| LCUP Preparation                           | \$8,600         | Lump Sum        | \$8,600 |
| Total Cost For the Land Line Control Imple | montation Plan: |                 | \$8,600 |
| Total Cost For the Land Use Control Imple  | mentation Plan: |                 | \$8,000 |

#### 2.0 Planning, Permitting and Reporting

Deliverables will include work plan, health and safety plan and a closure report. In addition, the substantive requirements for a Classification Exemption Area submittal will need to be made.

| Total Cost for Reporting   |                      |                      | \$63,000         |
|--|----------------------|----------------------|------------------|
| FSP, QAPP, and DQOs<br>Closeout Report (Draft, Draft Final, Final) | \$17,000<br>\$12,000 | Lump Sum<br>Lump Sum | 17,000<br>12,000 |
| Health and Safety Plan   | \$9,000              | Lump Sum             | 9,000            |
| Work Plan  | \$20,000             | Lump Sum             | 20,000           |
| Permit equivalents   | \$5,000              | Lump Sum             | 5,000            |
| Description  | Unit Rate            | Number of Units      | Cost             |

#### Summary of Institutional Control/Planning Costs

| Description  | Cost     |
|--|----------|
| Total Cost For Institutional Controls Plan Amendments: | \$8,600  |
| Total Cost For Planning, Permitting, and Reporting     | \$63,000 |
| Total Capital Cost for Institutional Controls:         | \$71,600 |

#### **OPERATION AND MAINTENANCE (O&M) COSTS**

#### 3.0 Long-Term Groundwater and Surface Water Monitoring

The long-term groundwater monitoring would be designed to evaluate the extent to which natural attenuation of the COCs is occurring, ensure that the plume characteristics are not changing in an unexpected manner, no new source areas are apparent, regulatory levels are being met, and the plume as a whole is acting as predicted.

The analytical program for the long-term groundwater monitoring program will consist of all of the contaminants of concern and daughter products in addition to dissolved oxygen, ORP, nitrate, iron (II), sulfate, and methane. These parameters ensure monitoring of the plume for regulatory compliance as wells as monitoring for changing geochemical and oxidation reduction state. All quality control sample analysis (field duplicates, rinse blanks, trip blanks) are assumed to be 20% of the total number of samples collection (20% of analytical costs).

For each sampling event, the following unit costs and level of efforts (LOEs) will apply:

| Field Sampler:  | \$55.00 /hr/person |
|---|--------------------|
| Number of People:                                       | 2 people           |
| Hours worked per day:                                   | 8 hrs              |
| Anticipated time to collect GW samples per location:    | 3.0 hrs            |
| Number of Wells to Sample for the long-term monitoring: | 12 wells           |
| Number of Surface Water Samples Collected Per Event:    | 5 locations        |
| Anticipated time to collect SW samples per location:    | 1.5 hrs            |
| Data Management cost per sampling event: \$             | 3,000.00 per event |

| Description  | Unit Rate            | Number of units | Cost     |
|--|----------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                           |                      |                 |          |
| Labor for chemical sampling                        | \$55.00 /hr/person   | 44 hrs          | \$4,840  |
| Equipment (vehicle, pumps, water quality           |                      |                 |          |
| meter, etc.)                                       | \$1000.00 /event     | 1 event         | \$1,000  |
| Chemical Analysis Cost                             |                      |                 |          |
| VOCs (Including TCE, DCE, VC)                      | \$50.00              | 21 samples      | \$1,050  |
| alkalinity   | \$15.00              | 21 samples      | \$315    |
| Iron (II)  | \$10.00              | 21 samples      | \$210    |
| Sulfate  | \$20.00              | 21 samples      | \$420    |
| Methane, Ethane, Ethene                            | \$85.00              | 21 samples      | \$1,785  |
| TOTAL CHEMICAL ANALYSIS COST:                      |                      |                 | \$3,780  |
| Data Management and Annual Monitoring<br>Reporting | \$5,000.00 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per S           | ampling Event        |                 | \$14,620 |

It is assumed that following the first 10 years of the LTM program that the total number of wells to be sampled would be reduced from 12 to 8.

| Description                                     | Unit Rate            | Number of units | Cost     |
|---|----------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                      |                 |          |
| Labor for chemical sampling                     | \$55.00 /hr/person   | 32 hrs          | \$3,520  |
| Equipment (vehicle, pumps, water quality        | \$1000.00 /event     | 1 event         | \$1,000  |
| Chemical Analysis Cost                          |                      |                 |          |
| VOCs (Including TCE, DCE, VC)                   | \$50.00              | 16 samples      | \$800    |
| alkalinity                                      | \$15.00              | 16 samples      | \$240    |
| Iron (II)                                       | \$10.00              | 16 samples      | \$160    |
| Sulfate   | \$20.00              | 16 samples      | \$320    |
| Methane, Ethane, Ethene                         | \$85.00              | 16 samples      | \$1,360  |
| TOTAL CHEMICAL ANALYSIS COST:                   |                      |                 | \$2,880  |
| Data Management and Annual Monitoring<br>Report | \$5,000.00 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per S        | ampling Event        |                 | \$12,400 |

#### DESCRIPTION OF COSTS PER PHASE ADJUSTED TO PRESENT VALUE

| Using a discount rate of                                     | 3.5%     | for a period of | 15 years        | \$13,400  |
|--|----------|-----------------|-----------------|-----------|
| five years for 15 years)                                     |          | \$12,400 /event | 1 events        | \$12,400  |
| Cost for Years 21-35 (sampled once                           | every    |                 |                 |           |
| Description  |          | Unit Rate       | Number of units | Cost      |
| Using a discount rate of                                     | 3.5%     | for a period of | 10 years        | \$73,100  |
| Annual Cost for Years 11-20 (annua<br>sampling for 10 years) |          | \$12,400 /event | 1 events        | \$12,400  |
| Description  |          | Unit Rate       | Number of units | Cost      |
| Using a discount rate of                                     | 3.5%     | for a period of | 10 years        | \$243,200 |
| 1-10   | •        | \$14,600 /event | 2 events        | \$29,240  |
| Annual Cost for Semiannual Sampli                            | ng Years |                 |                 |           |
| Description  |          | Unit Rate       | Number of units | Cost      |

**Total Discounted Sampling Cost:** 

| Total        | \$329,700 |
|--------------|-----------|
| Years 21-60  | \$13,400  |
| Years 11-20  | \$73,100  |
| Years 1-10   | \$243,200 |
| mpning ooot. |           |

#### 4.0 Well Construction, Abandonment, and Maintenance

Since natural attenuation monitoring will occur over an anticipated period of 50 years, the groundwater monitoring wells will require maintenance to allow for accurate sampling of the aquifer. This will include inspections yearly with maintenance as needed.

| Description   | Unit Rate  | Number of units                      | Discounted Cost                         |
|---|--|--------------------------------------|---|
| Well inspection and maintenance   | \$2,158 /year                                    | 35 years                             | \$43,180                                |
| Future Well abandonment   | \$2,425 /well                                    | 25 wells                             | \$10,871                                |
| Well Replacement  |  |                                      |   |
| Well replacement will be performed periodical                                   | ly as needed. For the purp                       | oose of this FS, the well re         | placement is assumed to                 |
| , ,   | of the project. UXO support                      | t will be required for each          | well, assumed to take 2 day             |
| occur every five years for the entire duration to complete.<br>Well replacement | of the project. UXO support<br>\$16,865 / 5 year | t will be required for each 35 years | well, assumed to take 2 day<br>\$62,900 |

Discount Rate = 3.5%

#### 5.0 5-Year Review

Five-year reviews will be performed to assess the effectiveness of the remedy. For the purpose of this FS, the duration for these activities is assumed to be 50 years.

| Description  | Unit Rate          | Number of units | Cost     |
|--|--------------------|-----------------|----------|
| 5-Year Review (including draft, draft fina<br>and final reports) | al,<br>\$15,000    | lump sum        | \$15,000 |
| Using a discount rate of 3.                                      | 5% for a period of | 50 years        | \$73,771 |

#### 6.0 Land Use Control Inspections/Sign Repairs/ Construction Support

Construction Support will be required during all intrusive operations (sign replacement, utility repairs, etc). Assumes 40 hours/year of Construction support

| Description                                 | Unit Rate       | Number of units | Cost      |
|---|-----------------|-----------------|-----------|
| UXO Construction Support – (Tech III)       | \$4,750/year    | lump sum        | \$4,750   |
| Land Use Control Inspection/Sign<br>Repairs | \$5,575/year    | lump sum        | \$5.575   |
| Using a discount rate of 3.5%               | for a period of | 50 years        | \$242,104 |

| unted O&M Cost:<br>50-Year Sampling Cost<br>Well Construction, Abandonment, and Mainte<br>5-Year Reviews | nance | \$329,700<br>\$116,951<br>\$73,771 |
|--|-------|------------------------------------|
| Total  |       | \$520,422                          |
| TOTAL CAPITAL COST:  |       | \$71,600                           |
| DISCOUNTED O&M COST:   |       | \$520,422                          |
| Contingency of Scope:  | 5%    | \$27,494                           |
| Contingency of Bid:  | 10%   | \$54,989                           |
| TOTAL DISCOUNTED O&M COST:   |       | \$602,905                          |
| TOTAL PRESENT WORTH VALUE:   |       | \$674,505                          |

Alternative 3 would involve: 1) injection of a chemical oxidant (permanganate is generally the preferred oxidant for TCE remediation) within the source area of the contaminant concentrations, 2) monitored natural attenuation of the remainder of the TCE plume; 3) maintenance and enforcement of ICs for as long as groundwater concentrations remain above SCLs, and 4) Annual Inspections for land use controls and construction support for intrusive operations. Under Alternative 3, TCE concentrations in the source area of the plume would be chemically degraded, thereby decreasing contaminant discharge into downgradient receptors to below ARAR levels. Performance monitoring of selected source area wells would be performed monthly for the first 6 months to be followed by quarterly monitoring until one year after the final permanganate injection. Monitoring of downgradient wells and surface water would be performed semiannually during the performance monitoring period. MNA polishing of residual groundwater TCE concentrations in the aquifer once active treatment (to protect downgradient receptors) is complete. LUCs and construction support would be required due to the potential for MEC hazards.

Following the performance monitoring period, long term monitoring would consist of both source area and downgradient wells and surface water sampled semiannually to year 10 (from implementation of the remedy), annually to year 20, and once every 5 years to year 50.

#### **GENERAL ASSUMPTIONS**

1) The costs are adopted from, previous work conducted by ECC and professional judgment.

2) The costs are adjusted with a location factor for Dover, New Jersey

3) The costs and duration of the construction activities are based on an 8-hour 5-day per week working schedule, unless otherwise noted.

4) Work is to be conducted under a safety level D condition.

5) A two person UXO team will be used for all clearing, grubbing, and ground intrusive activities.

6) Dimensions of the Areas of Concern:

| AAs                 | G         | N Plume       | Surface Area |
|---------------------|-----------|---------------|--------------|
| AAS                 | Area (SF) | Volume (Gal.) | Area (SF)*   |
| AA <sub>1GW-1</sub> | 48,000    | 2,692,800     | 52,800       |
|                     |           |               |              |

\* Groundwater plume area multiplied by 1.1

#### CAPITAL COSTS

#### 1.0 Institutional Controls/Planning

Land Use Restrictions: A site-specific Land Use Control Implementation Plan (LUCIP) will need to be written in order to place restrictions on activities that can be performed in areas of the plumes at the 600 Area Sites and within the Inactive Munitions Waste Pit MRS. These restrictions can be enforced through existing institutional controls and by restricting future land use. The land use restrictions will ensure that potential receptors are not exposed to contaminated groundwater from the 600 Area plumes or exposed to MEC hazards.

| Description                               | Unit Rate       | Number of units | Cost    |
|---|-----------------|-----------------|---------|
| LCUP Preparation                          | \$8,600         | Lump Sum        | \$8,600 |
| Total Cost For the Land Use Control Imple | mentation Plan: |                 | \$8,600 |

#### 2.0 Planning, Permitting and Reporting

Permit equivalents required for this alternative will include drilling for injection wells and any additional groundwater monitoring wells (including replacement wells which may be necessary during the timeframe of the project). Deliverables will include a work plan, design drawings and specifications, a health and safety plan and a closure report. In addition, the substantive requirements for a Classification Exemption Area submittal will need to be made.

| Description  | Unit Rate                       | Number of Units                  | Cost                      |
|--|---------------------------------|----------------------------------|---------------------------|
| Permit equivalents   | \$5,300                         | Lump Sum                         | 5,300                     |
| Design documents (drawings, specifications,<br>design basis) - draft, draft final, and final | \$27,700                        | Lump Sum                         | 27,700                    |
| Pilot Tests (Oxidant Injections, ROI)<br>Work Plan<br>Health and Safety Plan                 | \$41,500<br>\$20,000<br>\$9,000 | Lump Sum<br>Lump Sum<br>Lump Sum | 41,500<br>20,000<br>9,000 |
| FSP, QAPP, and DQOs<br>Closeout Report (Draft, Draft Final, Final)                           | \$17,400<br>\$11,600            | Lump Sum<br>Lump Sum             | 17,400<br>11,600          |
| Total Cost for Reporting   |                                 |                                  | \$132,500                 |

#### Summary of Institutional Control/Planning Costs

| Description  | Cost      |
|--|-----------|
| Total Cost For Institutional Controls Plan Amendments: | \$8,600   |
| Total Cost For Planning, Permitting, and Reporting     | \$132,500 |
| Total Cost for Institutional Controls:                 | \$141,100 |

#### 3.0 Site Preparations

#### 3.1 Clearing

Negligible clearing will be required to allow drill rig access for the installation of injection wells.

#### 3.2 Erosion Control (Silt Fence Construction and Maintenance):

Prior to start of work, silt fence will be erected along the perimeter of the work areas.

Silt fence will be maintained in an erect position and cleaned as required to ensure efficiency.

Required length of silt fence:

#### 350 LF

|  |              |                 | Duration |         |
|--|--------------|-----------------|----------|---------|
| Description                                | Unit Rate    | Number of units | (days)   | Cost    |
| Silt fencing, polypropylene,               |              |                 |          |         |
| adverse conditions, 3' high                | \$3.39 /lf   | 350 lf          | 1        | \$1,187 |
| UXO Avoidance (2 person team) Professional | \$1,800 /day |                 | 1        | \$2,400 |
|  | 10%          |                 |          | \$2,969 |
| Total Erosion Control Cost                 |              |                 |          |         |

Estimated time required for Silt Fence Construction = 1 days

3.3 Layout and Construction Survey The purpose of a layout/construction survey is to assure that the proper amount of cover materials are in place. The work will consist of furnishing, placing, and maintaining the construction layout controls (stakes) necessary.

Assumptions:

1) Survey crew used to perform the construction layout survey will require a two person crew.

| Description                     | Unit Rate   | Number of units | Cost    |
|---------------------------------|-------------|-----------------|---------|
| Surveying Crew, 2 person survey | \$1,250/day | 5 days          | \$6,250 |
| Total Surveying Cost            |             |                 | \$6,250 |

Estimated Number of days required =

5 days

#### 4.0 Injections of Permanganate and Construction of Monitoring Wells

Injections of permanganate would involve: (1) installation of 6 injection wells and 2 monitoring wells; and (2) injection of approximately The initial stage would consist of installing approximately 8 wells, 6 injection wells and 2 monitoring wells, followed by a pilot test. UXO clearance is required for well installation.

| Total Cost with H&S markup 10%   |                                     |                                  | \$160,210                       |  |
|--|-------------------------------------|----------------------------------|---------------------------------|--|
| Total Cost for MW Installation and Lactate In  | ection                              |                                  | \$145,646                       |  |
| <u>Permanganate Injection</u><br>Field Scientist/Superintendent<br>Equipment (vehicle, poly tank, pump)<br>Sodium Permanganate | \$826 /day<br>\$7,808<br>\$2.18 /lb | 22 days<br>Iump sum<br>6,700 lbs | \$18,172<br>\$7,808<br>\$14,606 |  |
| UXO Avoidance (2 person team)  | \$1,560 /day                        | 16 days                          | \$24,960                        |  |
| <u>Well Installation</u><br>njection/Monitoring Well Installation  | \$10,015 /well                      | 8 wells                          | \$80,120                        |  |
| Description  | Unit Rate                           | Number of units                  | Cost                            |  |

#### Estimated construction time for the sodium permanganate injections:

#### 4.1 Performance Monitoring Following First Injection of Oxidizer

Performance monitoring for alternative 3 will consist of sampling selected source area monitoring wells. Samples will be collected

For each sampling event, the following unit costs and level of efforts (LOEs) will apply:

| Field Sampler:  | \$58 /hr/person |
|---|-----------------|
| Number of People:                                     | 2 people        |
| Anticipated time to collect samples per location:     | 3.0 hrs         |
| Number of Wells to Sample for performance monitoring: | 3 wells         |

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 8 hrs           | \$928    |
| Equipment (vehicle, pumps, water quality meter, | \$1,752.00 /event | 1 event         | \$1,752  |
| Chemical Analysis Cost and validation           |                   |                 |          |
| VOCs (including TCE, DCE, VC)                   | \$50              | 4 samples       | \$200    |
| Methane, ethane, ethene                         | \$85              | 4 samples       | \$340    |
| Total Sampling and Analysis Cost per event      |                   |                 | \$3,220  |
| TOTAL CHEMICAL ANALYSIS COST:                   | \$3,220.00 /month | 6 months        | \$19,320 |
| Monitoring Report Cost and Data Management      | \$8,995.00        | Lump Sum        | \$8,995  |
| Total Performance Monitoring Cost               |                   | •               | \$28,315 |

22 days

#### 5.0 Mobilization/Demobilization

Mobilization and demobilization consists of providing and removing all required equipment and materials to and from the site.

Mobilization is calculated as 10% of the direct capital costs, including site preparations and remedial system installations.

| Mobilization/Demobilization | 10% of capital | \$32,528 |
|-----------------------------|----------------|----------|
|                             |                |          |

#### 6.0 Construction and Technical Oversight

Enhanced anaerobic degradation will require technical oversight during the planning and design stages and during the

| Estimated total construction time | Site              |    |      |
|-----------------------------------|-------------------|----|------|
| frame:                            | preparations:     | 4  | days |
|                                   | Substrate Inject. | 22 | days |
|                                   | Mob/Demob         | 2  | days |

| Description                               | Unit Rate        | Number o | of units | Cost     |
|---|------------------|----------|----------|----------|
| Data Review                               | \$1,000.00       | lump s   | um       | \$1,000  |
| Site Visit and Meeting                    | \$5,000.00       | lump s   | um       | \$5,000  |
| Field Engineer                            | \$3,787.00 /week | 6        | weeks    | \$22,700 |
| H&S Engineer                              | \$5,020.00 /week | 1.2      | weeks    | \$6,040  |
| Total Cost for Construction and Oversight |                  |          |          | \$34,724 |

All work associated with Remedial Alternative GW-3 to be done using local workforce.

#### SUMMARY OF CAPITAL COSTS:

| 1) Land Use Restrictions & Inst    | \$8,600                             |           |
|------------------------------------|-------------------------------------|-----------|
| 2) Permits and Reports Writing     |                                     | \$132,500 |
| 3) Site Preparation                |                                     | \$9,219   |
| 4) Installation of Injection Point | s and Sodium Permanganate Injection | \$174,961 |
| 5) Mobilization/Demobilization     | \$32528                             |           |
| 6) Construction Oversight          |                                     | \$34,724  |
| Contingency of Scope               | 10%                                 | \$39,253  |
| Contingency of Bid                 | 5%                                  | \$19,626  |
| TOTAL CAPITAL COST                 | \$451,412                           |           |

#### **OPERATION AND MAINTENANCE COSTS**

O&M activities required under this alternative would include additional permanganate injections as necessary to ensure contaminant reduction in groundwater.

#### 7.0 Additional Injections of Sodium Permanganate

Additional injections of permanganate would be performed as necessary to protect downgradient receptors. The objective of additional Injection of permanganate would be performed by site personnel, using the existing injection/monitoring wells and therefore would not require additional well installation.

| Description                                  | Unit Rate  | Number of units | Cost     |
|--|------------|-----------------|----------|
| Field Scientist (2)                          | \$826 /day | 22 days         | \$18,172 |
| Equipment (vehicle, poly tank, pump)         | \$7,808    | lump sum        | \$7,808  |
| Sodium Permanganate                          | \$2.18 /lb | 6,700 lbs       | \$14,628 |
| Total Cost for Additional Lactate Injections |            |                 | \$40,608 |
| Total Cost with H&S markup of:               | 10%        |                 | \$44,668 |

#### Estimated construction time for the ISCO injections:

22 days

For the purpose of this cost estimate it is assumed that additional injections would be performed yearly for a period of three years.

| Using a discount rate of 3.5%                          | for a period of | 2 years         | \$84,855 |
|--|-----------------|-----------------|----------|
| Annual Costs for Additional Permanganate<br>Injections | \$44,668 /event | 1 events        | \$44,668 |
| Description  | Unit Rate       | Number of units | Cost     |

#### 8.0 Long-Term Groundwater Monitoring

The long-term groundwater monitoring would be designed to monitor the RA performance and ensure that the plume characteristics are meeting restoration goals.

The analytical program for the long-term groundwater monitoring program will consist of three parts:

- · Source area monitoring following permanganate injections
- Downgradient monitoring during ISCO Injection period
- · Long-term monitoring following completion of ISCO treatment

For each sampling event, the following unit costs and level of efforts (LOEs) will apply:

| Field Sampler:   | \$58 /hr/person |
|--|-----------------|
| Number of People:  | 2 people        |
| Hours worked per day:                                    | 10 hrs          |
| Anticipated time to collect samples per monitoring well: | 3.0 hrs         |
| Anticipated time to collect SW samples per location      | 1.5 hrs         |
|  |                 |

Data Management/Monitoring Report per sampling event: \$5,000 per event

#### 8.1 Source Area Monitoring Following Additional Permanganate Injections

Number of Wells to Sample for performance monitoring program: 4 wells

| Description                                     | Unit Rate         | Number of units   | Cost     |
|---|-------------------|-------------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                   |          |
| Labor for chemical sampling                     | \$58. /hr/person  | 12 hrs            | \$1,392  |
| Equipment (vehicle, pumps, water quality meter, | \$1,752 /event    | 1 event           | \$1,752  |
| Chemical Analysis Cost                          |                   |                   |          |
| VOCs (including TCE, DCE, VC)                   | \$50              | 5 samples         | \$250    |
| Methane, ethane, ethene                         | \$850             | 5 samples         | \$425    |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                   | \$3,819  |
| Monitoring Report Cost and Data Management      | \$5,000.00        | Lump sum          | \$5,000  |
| Total Source Area Monitoring Cost Per Event     |                   |                   | \$8,819  |
|   | Link Data         | Musel an of units | Orat     |
| Description                                     | Unit Rate         | Number of units   | Cost     |
| Annual Cost for Quarterly Sampling Years 1-3    | \$8,819.00 /event | 4 events          | \$35,276 |
| Using a discount rate of 3.5%                   | for a period of   | 3 years           | \$98,831 |

#### 8.2 Downgradient Monitoring During the ISCO Injection Period

Number of Wells to Sample for downgradient monitoring: Number of surface water samples collected per event

| Description   | Unit Rate          | Number of units | Cost                      |
|---|--------------------|-----------------|---------------------------|
| COSTS PER SAMPLING EVENT  |                    |                 |                           |
| Labor for chemical sampling   | \$58 /hr/person    | 40.5 hrs        | \$4,698                   |
| Equipment (vehicle, pumps, water quality meter,<br>Chemical Analysis Cost | \$1,752 /event     | 1 event         | \$1,752                   |
|   | 2405               |                 | <b>*</b> 2 <b>7</b> 00    |
| VOCs (including TCE, DCE, VC, ethene)                                     | \$135              | 20 samples      | \$2,700<br><b>\$2,700</b> |
| TO THE OTHER TO A COULT   |                    |                 | <i><b>Q</b>2,700</i>      |
| Monitoring Report Costs and Data Management per<br>Year                   | \$5,000 per event  | 1 event         | \$5,000                   |
| Total Downgradient Sampling and Reporting Costs                           | per Sampling Event |                 | \$14,150                  |
| Description   | Unit Rate          | Number of units | Cost                      |

| Description                    |                    | Unit Rate       | Number of units | Cost     |
|--------------------------------|--------------------|-----------------|-----------------|----------|
| Annual Cost for Semiannual Sam | pling Years 1-3 (3 | \$14,150 /event | 2 events        | \$28,300 |
| years                          |                    |                 |                 |          |
| Using a discount rate of       | 3.5%               | for a period of | 3 years         | \$79,286 |

#### 8.3 Long-Term Monitoring Following Completion of ISCO Treatment

It is assumed that the total number of monitoring wells to be sampled for the LTM program would be reduced from the performance

Number of Wells to Sample for the long-term monitoring program: Number of surface water samples collected per event 9 wells 5 locations

11 wells

5 locations

| Description                                       | Unit Rate         | Number of units | Cost             |
|---|-------------------|-----------------|------------------|
| COSTS PER SAMPLING EVENT                          |                   |                 |                  |
| Labor for chemical sampling                       | \$58 /hr/person   | 34.5 hrs        | \$4,002          |
| Equipment (vehicle, pumps, water quality meter,   | \$1,752 /event    | 1 event         | \$1, <b>7</b> 52 |
| Chemical Analysis Cost                            |                   |                 |                  |
| VOCs (including TCE, DCE, VC, ethene)             | \$135             | 17 samples      | \$2,295          |
| TOTAL CHEMICAL ANALYSIS COST:                     |                   |                 | \$2,295          |
| Monitoring Report and Data Management Costs per   | \$5,000 per event | 1 event         | \$5,000          |
| Total Sampling and Reporting Costs per Sampling I | Event             |                 | \$13,049         |

#### DESCRIPTION OF COSTS PER PHASE

| Description                      |                  | Unit Rate          | Number of units | Cost      |
|----------------------------------|------------------|--------------------|-----------------|-----------|
| Annual Cost for Semiannual Sam   | pling Years 4-10 | \$13,049 /event    | 2 events        | \$26,098  |
| Using a discount rate of         | 3.5%             | for a period of    | 7 years         | \$143,929 |
| Description                      |                  | Unit Rate          | Number of units | Cost      |
| Annual Sampling Costs for Year   | 11-20 (10 years) | \$13,049.00 /event | 1 events        | \$13,049  |
| Using a discount rate of         | 3.5%             | for a period of    | 10 years        | \$42,955  |
| Description                      |                  | Unit Rate          | Number of units | Cost      |
| Sampling Costs for Years 21-35 ( | 15 years)        | \$13,049.00 /event | 1 events        | \$13,049  |
| Using a discount rate of         | 3.5%             | for a period of    | 15 years        | \$14,085  |

**Total Discounted LTM Sampling Cost:** 

| Years 1-6   | \$178,116.95 |
|-------------|--------------|
| Years 7-10  | \$143,929.64 |
| Years 11-20 | \$42,955.78  |
| Years 21-60 | \$14,085.12  |
| Total       | \$379,087.49 |

#### 9.0 Well Abandonment, Replacement, and Maintenance

Since the long-term monitoring would occur over a period of 50 years, the groundwater monitoring wells will require maintenance to allow to allow for accurate sampling of the aquifer. This will include inspections yearly with maintenance as needed.

| Description Vell inspection and maintenance                   | \$2,158 /year                  | Number of units<br>35 years   | <u> </u>               |
|---|--------------------------------|-------------------------------|------------------------|
| Future Well abandonment                                       | \$2,425 /well                  | 31 wells                      | \$18,213               |
| Well replacement will be performed periodicall                | viac pooled . For the purpose  | of this EC, the wall realized |                        |
| every five yearsfor the entire duration of the p<br>complete. |                                |                               |                        |
| every five yearsfor the entire duration of the p              |                                |                               |                        |
| every five yearsfor the entire duration of the p<br>complete. | project. UXO support will be r | equired for each well, assu   | umed to take 2 days to |

Discount Rate = 3.5%

#### 10.0 5-Year Review

Five-year reviews will be performed to assess the effectiveness of the remedy. For the purpose of this FS, the duration for these remedies.

| Description   | Unit Rate              | Number of units | Cost     |
|---|------------------------|-----------------|----------|
| 5-Year Review (including draft, draft final, and final reports) | \$15,000               | lump sum        | \$15,000 |
| Using a discount rate of 3.5% for a p                           | eriod of 50 years \$73 | ,771.49         |          |

#### 11.0 Land Use Control Inspections/Sign Repairs/ Construction Support

Construction Support will be required during all intrusive operations (sign replacement, utility repairs, etc). Assumes 40 hours/year of Construction support.

| Description                              | Unit Rate              | Number of units | Cost    |
|--|------------------------|-----------------|---------|
| UXO Construction Support – (Tech III)    | \$4,750/year           | lump sum        | \$4,750 |
| Land Use Control Inspection/Sign Repairs | \$5,575/year           | lump sum        | \$5.575 |
| Using a discount rate of 3.5% for a pe   | eriod of 50 years \$24 | 2,104.08        |         |

#### Discounted O&M Cost:

| 11.0 – LUCs/construction Support<br>Total          | \$242,204 |
|--|-----------|
| 10.0 5-Year Reviews                                | \$73,771  |
| 9.0 Well Abandonment, Replacement, and Maintenance | \$106,085 |
| 8.0 Long Term Monitoring Program                   | \$379,087 |
| 7.0 Additional Injections of Permanganate          | \$84,855  |

|                            | · · |             |
|----------------------------|-----|-------------|
| DISCOUNTED O&M COST:       |     | \$886,002   |
| Contingency of Scope:      | 10% | \$88,600    |
| Contingency of Bid:        | 5%  | \$44,300    |
| TOTAL DISCOUNTED O&M COST: |     | \$1,018,902 |
| TOTAL PRESENT WORTH VALUE: |     | \$1,470,313 |

#### ALTERNATIVE 4 In Situ Enhanced Anaerobic Bioremediation, Monitored Natural Attenuation Polishing, and Land Use Controls

Alternative 4 would involve: 1) Construction of an infiltration gallery to apply a microbial growth substrate (for the purpose of this estimating costs it is assumed to be emulsified vegetable oil within the source area of the contaminant concentrations, 2) Installation of nested source area monitoring wells and an extraction well to use for infiltration 3) MNA of the remainder of the TCE plume; 4) maintenance and enforcement of ICs for as long as groundwater concentrations remain above SCLs, and 4) Annual Inspections for land use controls and construction support for intrusive operations. Under Alternative 4, TCE concentrations in the source area of the plume would be reduced, thereby decreasing contaminant discharge into downgradient receptors to below ARAR levels. Performance monitoring until one year after the final substrate injection. Monitoring of downgradient wells and surface water would be performed semiannually during the performance monitoring period. MNA polishing of residual groundwater TCE and daughter product concentrations in the aquifer once active treatment (to protect downgradient receptors) is complete.

Following the performance monitoring period, LTM would consist of both source area and downgradient wells and surface water sampled semiannually to year 10 (from implementation of the remedy), and annually to year 14. LUCs and construction support would be required due to the potential for MEC hazards.

Note: Injection of nano-scale zero-valent iron (ZVI) would be evaluated along with potential microbial growth substrates as part of the pilot study. Although abiotic, ZVI injection would involve nearly identical logistic requirements and result in reductive degradation of TCE (and its reductive daughter products). Sodium Lactate, the lowest cost (and most likely applied) substrate, is costed in this alternative.

#### **GENERAL ASSUMPTIONS**

1) The costs are adopted from, previous work conducted by ECC and professional judgment.

2) The costs are adjusted with a location factor for Dover, New Jersey

3) The costs and duration of the construction activities are based on an 8-hour 5-day per week working schedule, unless otherwise noted.

4) Work is to be conducted under a safety level D condition. However, a general health and safety markup of 10% will be used to account for modification of safety level condition, where appropriate.

5) A two person UXO team will be used for all clearing, grubbing, and ground intrusive activities.

6) treatment area is assumed to be 120' x 60' x 52' =374,400 ft<sup>3</sup>

#### CAPITAL COSTS

#### 1.0 Land Use Control Implementation Plan

Land Use Restrictions: A site-specific Land Use Control Implementation Plan (LUCIP) will need to be written in order to place restrictions on activities that can be performed in areas of the groundwater plume and within the Inactive Munitions Waste Pit MRS. These restrictions can be enforced through existing institutional controls and by restricting future land use. The land use restrictions will ensure that potential receptors are not exposed to contaminated groundwater from the 600 Area plume or exposed to MEC hazards.

| Description                               | Unit Rate       | Number of units | Cost    |
|---|-----------------|-----------------|---------|
| LUCP Preparation                          | \$8,600         | Lump Sum        | \$8,600 |
| Total Cost For the Land Use Control Imple | mentation Plan: |                 | \$8,600 |

#### 2.0 Planning, Permitting and Reporting

Permit equivalents required for this alternative will include drilling replacement wells which may be necessary during the timeframe of the project. Deliverables will include a work plan, design drawings and specifications, a health and safety plan and a closure report. In addition, the substantive requirements for a Classification Exemption Area submittal will need to be made.

#### ALTERNATIVE 4 In Situ Enhanced Anaerobic Bioremediation, Monitored Natural Attenuation Polishing, and Land Use Controls

| Description  | Unit Rate            | Number of Units      | Cost                 |
|--|----------------------|----------------------|----------------------|
| Permit equivalents   | \$5,300              | Lump Sum             | \$5,300              |
| Design documents (drawings, specifications,<br>design basis) - draft, draft final, and final | \$27,700             | Lump Sum             | \$27,700             |
| Work Plan<br>Health and Safety Plan  | \$20,000<br>\$9,000  | Lump Sum<br>Lump Sum | \$20,000<br>\$9,000  |
| FSP, QAPP, and DQOs<br>Closeout Report (Draft, Draft Final, Final)                           | \$17,400<br>\$11,600 | Lump Sum<br>Lump Sum | \$17,400<br>\$11,600 |
| Total Cost for Reporting   |                      |                      | \$91,000             |

| Summary | y of Institutional Control/Planning Costs | 5 |
|---------|---|---|
|         |   |   |

| Description  | Cost     |
|--|----------|
| Total Cost For Institutional Controls Plan Amendments: | \$8,600  |
| Total Cost For Planning, Permitting, and Reporting     | \$91,000 |
| Total Cost for Institutional Controls:                 | \$99,600 |

#### 3.0 Site Preparations

#### 3.1 Clearing

Negligible clearing will be required to allow drill rig access for the installation of injection wells.

#### 3.2 Erosion Control (Silt Fence Construction and Maintenance):

Prior to start of work, silt fence will be erected along the perimeter of the work areas. Silt fence will be maintained in an erect position and cleaned as required to ensure efficiency.

Required length of silt fence:

350 LF

|  |              |                 | Duration |                 |
|--|--------------|-----------------|----------|-----------------|
| Description                                | Unit Rate    | Number of units | (days)   | Cost            |
| Silt fencing, polypropylene,               |              |                 |          |                 |
| adverse conditions, 3' high                | \$3.39 /lf   | 350 lf          | 1        | <b>\$1</b> ,187 |
| UXO Avoidance (2 person team) Professional | \$1,800 /day |                 | 1        | \$2,400         |
|  | 10%          |                 |          | \$2,969         |
| Total Erosion Control Cost                 |              |                 |          |                 |

Estimated time required for Silt Fence Construction = 1 days

#### 3.3 Layout and Construction Survey

The purpose of a layout/construction survey is to assure that the proper amount of cover materials are in place. The work will consist of furnishing, placing, and maintaining the construction layout controls (stakes) necessary.

#### Assumptions:

| <br>~ | <br> | <br>             |  |
|-------|------|------------------|--|
|       |      |                  |  |
|       |      | yout survey will |  |
|       |      |                  |  |

| Cost    |
|---------|
|         |
| \$6,250 |
| \$6,250 |
|         |

Estimated Number of days required =

W912DR-04-0026 Task Order 04 117969-01040000 Quantity and Cost Estimate Final Feasibility Study, Rev #2 600 Area Sites

5 days

# 4.0 Construction of an Infiltration Gallery, application of emulsified vegetable oil (EVO) and nested source monitoring we and extraction well.

Application of EVO would involve: (1) construction of a nested source monitoring well and on extraction well (2) application of approximately 55,900 lbs of sodium lactate diluted to yield 173,300 gallons of solution

UXO support would be required for well installation and construction of the infiltration gallery for avoidance. Injection of EVO would be performed by site personnel and therefore would not require subsequent mobilization. EVO requirement is based on a 374,400 ft<sup>3</sup> source area.

| otal Cost with H&S markup of:  | 10%                                      |                                 | \$369,587                        |
|--|--|---------------------------------|----------------------------------|
| Total Cost for MW Installation and Lactate Injection   | on                                       |                                 | \$335,988                        |
| <u>Sodium Lactate Injection</u><br>Engineer and Superintendent<br>Equipment (vehicle, poly tank, pump)<br>Emulsified vegetable oil             | \$2,271.00/day<br>\$20,533<br>\$9.79/gal | 40 days<br>lump sum<br>7300 gal | \$90,840<br>\$20,533<br>\$71,467 |
| Infiltration Gallery Installation<br>Construction of a 120 x 60 x 3 x gallery (PVC piping<br>and stone) and connect piping to extraction well. | \$45,645 each                            | 1                               | \$45,645                         |
| JXO Avoidance (2 person team)<br>Geologist   | \$1,560.00 /day<br>\$1,025/day           | 16 days<br>16 days              | \$24,960<br>\$16,410             |
| <u>Well Installation</u><br>Source Well<br>Extraction Well with pump and solar panel   | \$10,485 /well<br>\$45,168/well          | 2 wells<br>1 well               | \$20,965<br>\$45,168             |
| Description  | Unit Rate                                | Number of units                 | Cost                             |

Estimated construction time for the emulsified vegetable oil injections:

40 days

#### 4.1 Performance Monitoring Following Substrate Injection

Performance monitoring for alternative 4 will consist of sampling selected source area monitoring wells. Samples will be collected monthly for a period of 6-months and quarterly for the remainder of the year following evo application. Samples will be analyzed for VOCs, TOC, nitrate alkalinity, soluble iron, methane, ethane, and ethene in addition to measured geochemical parameters measured during sampling. Quality control samples (field duplicates, rinse blanks, trip blanks) are assumed to be an additional 20% of the total number of samples collected.

| Field Sampler:  | \$58.00 /hr/person |
|---|--------------------|
| Number of People:   | 2 people           |
| Anticipated time to collect samples per location:               | 3.0 hrs            |
| Number of Wells to Sample for the long-term monitoring program: | 3 wells            |

| Description                                     | Unit Rate       | Number of units | Cost     |
|---|-----------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                 |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person | 8 hrs           | \$928    |
| Equipment (vehicle, pumps, water quality meter, | \$1,7520 /event | 1 event         | \$1,752  |
| Chemical Analysis Cost                          |                 |                 |          |
| VOCs (including TCE, DCE, VC)                   | \$50            | 4 samples       | \$200    |
| TOC   | \$26            | 4 samples       | \$104    |
| alkalinity                                      | \$15            | 4 samples       | \$60     |
| Iron (II)                                       | \$10            | 4 samples       | \$40     |
| Sulfate   | \$20            | 4 samples       | \$80     |
| Methane, ethane, ethene                         | \$85            | 4 samples       | \$340    |
| Total Sampling and Analysis Cost per event      |                 |                 | \$3,504  |
| TOTAL CHEMICAL ANALYSIS COST:                   | \$3,504 /month  | 6 months        | \$21,024 |
| Monitoring Report and Data Management Cost      | \$5,000         | Lump sum        | \$5,000  |
| Total Performance Monitoring Cost               |                 |                 | \$26,024 |

#### 5.0 Mobilization/Demobilization

Mobilization and demobilization consists of providing and removing all required equipment and materials to and from the site. In addition, providing all required utilities is also included with mobilization.

Mobilization is calculated as 10% of the direct capital costs, including site preparations and remedial system installations.

| Mobilization/Demobilization | 10% of capital | \$32,528 |
|-----------------------------|----------------|----------|
|                             |                |          |

#### 6.0 Construction and Technical Oversight

Enhanced anaerobic degradation will require technical oversight during the planning and design stages and during the implementation.

| Estimated total construction time frame: | Site<br>preparations:<br>Substrate Inject.<br>Mob/Demob | 6<br>8<br>2 | days<br>days<br>days |
|--|---|-------------|----------------------|
|  | Mob/Demob   | 2           | days                 |

| Description                               | Unit Rate     | Number of units | Cost     |
|---|---------------|-----------------|----------|
| Data Review                               | \$1,000       | lump sum        | \$1,000  |
| Site Visit and Meeting                    | \$5,000       | lump sum        | \$5,000  |
| Field Engineer                            | \$3,787 /week | 8 weeks         | \$30,296 |
| H&S Engineer                              | \$5,020 /week | 0.8 weeks       | \$4,016  |
| Total Cost for Construction and Oversight |               |                 | \$40,312 |

All work associated with Remedial Alternative 4 to be done using local workforce.

SUMMARY OF CAPITAL COSTS:

| SUMMART OF CAFITAL COSTS.          |                                |           |
|------------------------------------|--------------------------------|-----------|
| 1) Land Use Restrictions & Inst    | itutional Controls             | \$8,600   |
| 2) Permits and Reports Writing     |                                | \$99.600  |
| 3) Site Preparation                |                                | \$9,219   |
| 4) Installation of Injection Point | s and Sodium Lactate Injection | \$369,587 |
| 5) Mobilization/Demobilization     |                                | \$32,528. |
| 6) Construction Oversight          |                                | \$40,312  |
| Contingency of Scope               | 10%                            | \$41,885  |
| Contingency of Bid                 | 5%                             | \$20,595  |
| TOTAL CAPITAL COST                 |                                | \$622,326 |
|                                    |                                |           |

#### **OPERATION AND MAINTENANCE COSTS**

O&M activities required under this alternative would include additional substrate injections as necessary to ensure contaminant concentrations do not rebound to the extent which continues to impact downgradient receptors, and long-term monitoring of groundwater to measure the performance of the remediation.

#### 7.0 Additional Injections of EVO

Additional injections of EVO (or other microbial growth substrate) would be performed as necessary to protect downgradient receptors. The objective of additional application is to prevent a rebound in contaminant concentrations to above the modeled concentration demonstrated to be protective of downgradient receptors.

Application of EVO would be performed by site personnel, using the existing infiltration gallery and therefore would not require subsequent driller mobilization. EVO requirement is based on required mass to achieve a concentration of 500 mg/L within the targeted region, although the final substrate quantity would be adjusted based on the results of previous injections and pilot testing.

|   | -          |                 |           |
|---|------------|-----------------|-----------|
| Description                                     | Unit Rate  | Number of units | Cost      |
| Field Engineer/Super (2)                        | \$2271/day | 20 days         | \$45,420  |
| Equipment (vehicle, poly tank, pump)            | \$20,533   | Lump sum        | \$20,533  |
| EOS   | \$9.79/gal | 3650 gal        | \$35,744  |
| Total Cost for MW Installation and Lactate Inje | ection     |                 | \$101,697 |
| Total Cost with H&S markup of:                  | 10%        |                 | \$111,867 |

Estimated construction time for the sodium lactate injections:

20 days

#### 8.0 Long-Term Groundwater Monitoring

The long-term groundwater monitoring would be designed to monitor the RA performance and ensure that the plume characteristics are not changing, no new source areas are apparent, regulatory levels are being met, and the plume as a whole is acting as predicted. Quality control samples (field duplicates, rinse blanks, trip blanks) are assumed to be an additional 20% of the total numbers of samples collected.

The analytical program for long term monitoring will consist of 3 parts:

- Source area monitoring following EVO injections
- Downgradient monitoring during EVO infiltration period
- Long-term monitoring following completion of treatment

3 wells

For each sampling event, the following unit costs and level of efforts (LOEs) will apply:

| Field Sampler:   | \$58.00 /hr/person   |
|--|----------------------|
| Number of People:  | 2 people             |
| Hours worked per day:                                    | 10 hrs               |
| Anticipated time to collect samples per monitoring well: | 3.0 hrs              |
| Anticipated time to collect SW samples per location      | 1.5 hrs              |
| Monitoring Report per sampling event:                    | \$5,000.00 per event |

#### 8.1 Source Area Monitoring Following Additional Substrate Injections:

Number of wells to sample for performance monitoring program:

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 10 hrs          | \$1,160  |
| Equipment (vehicle, pumps, water quality meter, | \$1,752 /event    | 1 event         | \$600    |
| Chemical Analysis Cost                          | 1                 |                 |          |
| VOCs (including TCE, DCE, VC, ethene)           | \$50              | 4 samples       | \$200    |
| TOC   | \$26              | 4 samples       | \$104    |
| alkalinity                                      | \$15              | 4 samples       | \$60     |
| Iron (II)                                       | \$10              | 4 samples       | \$40     |
| Sulfate   | \$20              | 4 samples       | \$80     |
| Methane, ethane, ethene                         | \$85              | 4 samples       | \$340    |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                 | \$2,584  |
| Monitoring Report Costs                         | \$5,000 per event | 1 event         | \$5,000  |
| Total Source Area Monitoring Cost Per Event     |                   |                 | \$7,584  |
|   |                   |                 |          |
| Description                                     | Unit Rate         | Number of units | Cost     |
| Annual Cost for Quarterly Sampling Years 1-3 (3 |                   |                 |          |
| years)  | \$7,584 /event    | 4 events        | \$30,336 |
| Using a discount rate of 3.5%                   | for a period of   | 3 years         | \$84,990 |

#### 8.2 Downgradient Monitoring During the EVO Infiltration Period

 Number of wells to sample for performance monitoring program:
 11 wells

 Number of surface water samples collected per event:
 5 locations

| Description                                      | Unit Rate         | Number of units | Cost      |
|--|-------------------|-----------------|-----------|
| COSTS PER SAMPLING EVENT                         |                   |                 |           |
| Labor for chemical sampling                      | \$58 /hr/person   | 40.5 hrs        | \$2,349   |
| Equipment (vehicle, pumps, water quality meter,  | \$1,752 /event    | 1 event         | \$1,752   |
| Chemical Analysis Cost                           |                   | 1               |           |
| VOCs (including TCE, DCE, VC, ethene)            | \$135             | 20 samples      | \$2,700   |
| TOTAL CHEMICAL ANALYSIS COST:                    |                   |                 | \$6,801   |
| Monitoring Report Costs                          | \$5,000 per event | 1 event         | \$5,000   |
| Total Source Area Monitoring Cost Per Event      |                   |                 | \$11,8010 |
|  |                   |                 |           |
| Description                                      | Unit Rate         | Number of units | Cost      |
| Annual Cost for Semiannual Sampling Years 1-3 (3 |                   |                 |           |
| years)   | \$11,801 /event   | 2 events        | \$23,602  |
| Using a discount rate of 3.5%                    | for a period of   | 3 years         | \$66.124  |

#### 8.3 Long-Term Monitoring Following EVO Treatment

It is assumed that the total number of monitoring wells to be sampled for the LTM program would be reduced from the performance monitoring sampling. Two of the 4 source area monitoring wells (those with the highest historic concentrations) would be selected as representative of the source area, and an additional 4 wells would be eliminated from the downgradient wells.

| Number of wells to sample for performance monitoring program: | 9 wells     |
|---|-------------|
| Number of surface water samples collected per event:          | 5 locations |

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 34.5 hrs        | \$4,002  |
| Equipment (vehicle, pumps, water quality meter, | \$1752 /event     | 1 event         | \$1752   |
| Chemical Analysis Cost                          |                   |                 |          |
| VOCs (including TCE, DCE, VC, ethene)           | \$135             | 17 samples      | \$2,295  |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                 | \$8,049  |
| Monitoring Report Costs                         | \$5,000 per event | 1 event         | \$5,000  |
| Total Source Area Monitoring Cost Per Event     |                   |                 | \$13,049 |

#### DESCRIPTION OF COSTS PER PHASE

| Description                     |                   | Unit Rate       | Number of units | Cost     |
|---------------------------------|-------------------|-----------------|-----------------|----------|
| Annual Costs for Semiannual Sa  | mpling Years 4-10 |                 |                 |          |
| (4 years)                       |                   | \$13,049 /event | 2 events        | \$26,098 |
| Using a discount rate of        | 3.5%              | for a period of | 7 years         | \$65,947 |
|                                 |                   |                 |                 |          |
| Description                     |                   | Unit Rate       | Number of units | Cost     |
| Annual Costs for Annual Samplin | g Years 11-14 (10 |                 |                 |          |
| years)                          |                   | \$13,049 /event | 1 events        | \$13,049 |
| Using a discount rate of        | 3.5%              | for a period of | 4 years         | \$33,978 |

#### Total Discounted Sampling Cost:

| Years 1-3   | \$151,114 |
|-------------|-----------|
| Years 4-10  | \$65,947  |
| Years 11-14 | \$76,934  |
|             |           |

Total \$293,995

#### 9.0 Well Abandonment, Replacement, and Maintenance

Since the long-term monitoring would occur over a period of 50 years, the groundwater monitoring wells will require maintenance to allow for accurate sampling of the aquifer. This will include inspections yearly with maintenance as needed.

| Description                     | Unit Rate     | Number of units | Cost     |
|---------------------------------|---------------|-----------------|----------|
| Well inspection and maintenance | \$2,158 /year | 50 years        | \$50,636 |
| Future Well abandonment         | \$2,425 /well | 31 wells        | \$10,871 |

#### Well Replacement

Well replacement will be performed periodically as needed. For the purpose of this FS, the well replacement is assumed to occur every five yearsfor the entire duration of the project. UXO support will be required for each well, assumed to take 2 days to complete.

| Description                         | Unit Rate               | Number of units | Cost      |
|-------------------------------------|-------------------------|-----------------|-----------|
| Well replacement                    | \$16,865 / 5 year       | 50 years        | \$73,771  |
| Total Well Abandonment, Replacement | t, and Maintenance Cost |                 | \$135,279 |

Discount Rate =

#### 10.0 5-Year Review

Five-year reviews will be performed to assess the effectiveness of the remedy. For the purpose of this FS, the duration for these activities is assumed to be 50 years.

| Description                         |                     | Unit Rate       | Number of units |         | Cost     |
|-------------------------------------|---------------------|-----------------|-----------------|---------|----------|
| 5-Year Review (including draft, dra | ft final, and final |                 |                 |         |          |
| reports)                            |                     | \$15,000        | 1               | reviews | \$15,000 |
|                                     |                     |                 |                 |         |          |
| Using a discount rate of            | 3.5%                | for a period of | 50 years        |         | \$73,771 |

#### 11.0 Land Use Control Inspections/Sign Repairs/ Construction Support

Construction Support will be required during all intrusive operations (sign replacement, utility repairs, etc). Assumes 40 hours/year of Construction support.

| Description   | Unit Rate    | Number of units | Cost    |  |
|---|--------------|-----------------|---------|--|
| UXO Construction Support – (Tech III)                               | \$4,750/year | lump sum        | \$4,750 |  |
| Land Use Control Inspection/Sign Repairs                            | \$5,575/year | lump sum        | \$5.575 |  |
| Using a discount rate of 3.5% for a period of 50 years \$242,104.08 |              |                 |         |  |

#### **Discounted O&M Cost:**

| Total  | \$857,116 |
|--|-----------|
| 11.0 LUC/Construction Support                      | 242,204   |
| 10.0 5-Year Reviews                                | \$73,771  |
| 9.0 Well Abandonment, Replacement, and Maintenance | \$135,279 |
| 8.0 Long Term Monitoring Program                   | \$293,995 |
| 7.0 Additional Injections of Sodium Lactate        | \$111,867 |
|  |           |

| TOTAL CAPITAL COST:        |     | \$622,326   |
|----------------------------|-----|-------------|
| DISCOUNTED O&M COST:       |     | \$857,116   |
| Contingency of Scope:      | 10% | \$85,711    |
| Contingency of Bid:        | 5%  | \$42,855    |
| TOTAL DISCOUNTED O&M COST: |     | \$985,682   |
| TOTAL PRESENT WORTH VALUE: |     | \$1,608,008 |

Alternative 5 involves excavation of the assumed source of the plume in the soil overburden; LTM; and the maintenance and enforcement of ICs, in particular the restrictions of groundwater uses and long-term groundwater monitoring for all parameters that exceeded the SCLs., and the requirement for construction support in the uncleared areas of the MRS. It is assumed that groundwater-related ICs and the long-term groundwater monitoring would be performed for 10 years, and that MEC related LUCs and construction support will be required for 50 years. The anticipated length of LTM will be reevaluated following review of the groundwater sampling results, and evaluation of site-specific attenuation rates.

#### GENERAL ASSUMPTIONS

1) The costs are adopted from R.S. Means 2007 Cost works - Site Work, previous work conducted by Shaw Environmental at PTA, and professional judgment.

2) The costs are adjusted with a location factor for Dover, New Jersey

3) The costs and duration of the construction activities are based on an 8-hour 5-day per week working schedule, unless otherwise noted.
 4) Work is to be conducted under a safety level D condition. However, a general health and safety markup of 10% will be used to account for modification of safety level condition when appropriate.

5) For activities requiring construction support, the team will consist of: 1 truck driver, 2 laborers, 1 Tech 3,1 Tech 2, and 2 Operators (Tech 2).

6) For activities requiring MEC screening, the team will consist of: 1 truck driver, 2 laborers, SUXOS, UXOSO/QCS, 1 Tech 3, 2 Tech 2, 2 Tech 2, and 3 Operators (Tech 2).

7) The source area is assumed to be located under 20' of clean overburden, with an area 60' x 120' and a thickness of 5'. Total excavated volume: 18,087 CY. Volume of source area (60' x 120' x5'): 1334 CY, volume of clean overburden (60'x120'x20'): 5334 CY, volume of excavation sidewall cutback (1:2 slope): 11,419 CY

#### CAPITAL COSTS

#### 1.0 Institutional Controls/Planning

Land Use Restrictions: A site-specific Land Use Control Implementation Plan (LUCIP) will need to be written in order to place restrictions on activities that can be performed in areas of the plumes at the 600 Area Sites. These restrictions can be enforced through existing institutional controls and by restricting future land use. The land use restrictions will ensure that potential receptors are not exposed to contaminated groundwater from the 600 Area plumes.

| Description                            | Unit Rate           | Number of units | Cost    |
|--|---------------------|-----------------|---------|
| LCUP Preparation                       | \$8,600             | Lump Sum        | \$8,600 |
|  |                     |                 |         |
| Total Cost For the Land Use Control In | nplementation Plan: |                 | \$8,600 |

#### 2.0 Planning, Permitting and Reporting

Deliverables will include work plan, health and safety plan and a closure report. In addition, the substantive requirements for a Classification Exemption Area submittal will need to be made.

| Description  | Unit Rate | Number of Units | Cost     |
|--|-----------|-----------------|----------|
| Permit equivalents                                 | \$2,000   | Lump Sum        | 5,300    |
| Design documents (drawings, specifications, design |           |                 |          |
| basis) - draft, draft final, and final             | \$27,700  | Lump Sum        | 27,700   |
| Work Plan  | \$20,000  | Lump Sum        | 20,000   |
| Explosive Safety Submission                        | \$6,700   | Lump Sum        | 6,700    |
| Health and Safety Plan                             | \$9,000   | Lump Sum        | 9,000    |
| FSP, QAPP, and DQOs                                | \$17,400  | Lump Sum        | 17,400   |
| Closeout Report (Draft, Draft Final, Final)        | \$11,600  | Lump Sum        | 11,600   |
| Total Cost for Reporting                           |           |                 | \$97,700 |

Summary of Institutional Control/Planning Costs

| Description  | Cost      |
|--|-----------|
| Total Cost For Institutional Controls Plan Amendments: | \$8,600   |
| Total Cost For Planning, Permitting, and Reporting     | \$97,700  |
| Total Capital Cost for Institutional Controls:         | \$106,300 |

#### 3.0 Site Preparation

3.1 Erosion Control

Prior to start of work, silt fence will be erected along the perimeter of the work areas. In addition to the assumed 60' x 120' source area, a 1:2 slope will be required for side wall stabilization. For an overall depth of 25' bgs, the resulting cutback is 50', yeilding a 160' x 220' work area.

Silt fence will be maintained in an erect position and cleaned as required to ensure efficiency

Required length of silt fence (110% of work area perimeter):

836 LF

| Description                 | Cost Code | Unit Rate    | Number of units | Duration | Cost    |  |
|-----------------------------|-----------|--------------|-----------------|----------|---------|--|
| Silt fencing, polypropylene | ),        | \$3.39 /lf   | 836 lf          | 1        | \$2834  |  |
| MEC Support (2 person te    | am)       | \$1,800 /day |                 | 1        | \$1,800 |  |
| Total Erosion Control Cost  |           |              |                 |          |         |  |

Estimated time required for Silt Fence Construction =

#### 3.2 Layout and Construction Survey

The purpose of a layout/construction survey is to assure that the proper amount of cover materials are in place. The work will consist of furnishing, placing, and maintaining the construction layout controls (stakes) necessary.

#### Assumptions:

1) Survey crew used to perform the construction layout survey will require a two person crew.

| Description                      | Cost Code | Unit Rate    | Number of units | Cost    |
|----------------------------------|-----------|--------------|-----------------|---------|
| Surveying Crew, 2 person survey  | /         | \$1,250 /day | 5 days          | \$6,250 |
| Total Cost for Survey Crew       |           |              | • • • • •       | \$6,250 |
| T                                |           |              |                 |         |
| Estimated Number of days require | red =     |              |                 | 5 days  |

Estimated Number of days required

#### 3.3 Site Setup/ Vehicle and Personnel Decontamination Area

The 4,000 sf decontamination facility will be constructed using a geomembrane liner to contain liquids generated during the decontamination activities. The liner will be placed directly on the ground surface. Sand will be used to smooth the existing terrain. Assumes no site trailer or utility hookups required, due to short duration of field work.

|   |           |                 | Duration |         |
|---|-----------|-----------------|----------|---------|
| Description   | Unit Rate | Number of units | (days)   | Cost    |
| Material and Installation costs for Decon Pad       |           |                 |          |         |
|   | \$8,700   | Lump Sum        |          | \$8,700 |
|   | Total     |                 |          | \$8,700 |
| Vehicle and Personnel Decon Area Cost               |           |                 |          |         |
| Estimated time required for Decon Area Construction | =         | 6 days          |          |         |

Estimated time required for Decon Area Construction

6 days

4.0 Excavation and Disposal of Source Material

4.1 Excavation of Material Requiring Construction Support

#### Assumptions:

Soil will be excavated using an excavator that will load directly into end dump trucks or staging area. The excavation rate and unit cost have been selected based on ECC experience and professional judgment to account for difficult terrain, site accessibility, and anticipated MEC clearance activities. In areas where the MEC/MD is not likely (i.e., clean overburden), construction support activities will be required. This will consist of having two UXO technicians visually observing the excavation. Excavation will proceed in six inch lifts such that debris will be observed if present. One UXO technicians visually observing the rear and upwind of the excavation equipment and will visually observe excavation. Assume 5,334 CY of clean overburden and 11,419 CY of cutback soil require construction support. Assume 700 CY/day during construction support activities.

CY CY CY

CY

Clean overburden and sidewall cutback spoils will be staged and used as backfill following confirmation sampling.

| Volume of source area requiring construction support:                 | 0     |
|---|-------|
| Volume of clean overburden requiring construction support:            | 5334  |
| Volume of excavation sidewall cutback requiring construction support: | 11419 |
| Total excavated volume requiring construction support:                | 16753 |

| Description   | Un       | it Rate | Dur | ation | Cost     |
|---|----------|---------|-----|-------|----------|
| Excavator, Track, 19 to 21 Metric Tons, JDeere<br>200CLC/Komstsu PC200  | \$314    | /day    | 23  | days  | \$7,222  |
| Two - Truck, 6X4,10-wheel End Dump, 12-14 CY,<br>70,000-lb. GVW, Diesel | \$410.00 | /day    | 23  | days  | \$9,430  |
| Misc Equipment/fuel   | \$540    | /day    | 23  | days  | \$12,420 |
| Carbon substrate application  | 9.79/g   | al      | 365 | 0 gal | \$36,390 |
| Construction Support Team   | \$4,198  | /day    | 23  | days  | \$95,554 |
| Total Cost for Source Material Excavation                               |          |         |     |       |          |

Estimated time required for Excavation =

23 days

#### 4.2 Excavation of Material Requiring Screening of Excavated Soil for MEC/MD

#### Assumptions:

TCE contaminated soil will require screening for MEC/MD and certification as safe prior to disposal. In addition, 914 CY of the excavated cutback will also require screening to remove MEC/MD. It is assumed that the screening process will involve laying out soil to be screened in 6-inch lifts and visually inspected (aided by the use of a Schonstedt) by a team of UXO Technicians. MEC/MD screening will take place simultaneously with the excavation. Assume 150 CY/day during construction support activities.

| Volume of source area:  | 1334 | CY |
|---|------|----|
| Volume of overburden expected to contain MEC/MD:                  | 0    | CY |
| Volume of excavation sidewall cutback expected to contain MEC/MD: | 914  | CY |
| Total excavated volume requiring MEC/MD screening:                | 2248 | CY |

| Description Cost Code   | Unit Ra     | ate  | Dur  | ation | Cost                  |
|---|-------------|------|------|-------|-----------------------|
| Excavator, Track, 19 to 21 Metric Tons, JDeere                                      |             |      | Duit |       | 0031                  |
| 200CLC/Komstsu PC200  | \$314/day   |      | 15   | days  | \$4,710               |
|   | \$410/day   |      | 15   | days  | \$6,150               |
| Two -Truck, 6X4,10-wheel End Dump, 12-14 CY,  |             |      |      |       | . ,                   |
| Loader, Articulating, 3.00 CY, (Rental) John Deere                                  | \$215       | /dav | 15   | days  | \$3,225               |
| Dozer, Standard Crawler, 90-99 HP, (Rental) John<br>Deere 650J, Cat D5 Komatsu D39P | \$200       | /day | 15   | days  | \$3,000               |
| Misc Equipment/fuel   | \$719       | /day | 15   | days  | \$10,787              |
| MEC and Construction Support Team   | \$7,995 /da | y    | 15   | days  | \$119,925             |
| Additional H & S Markup of<br>Total Cost for MEC/MD screening                       | 10%         | •    | •    | · · · | \$14,779<br>\$162,576 |
| Estimated time required for Excavation =  | -           | 15   | davs |       | · · · · ·             |

Estimated time required for Excavation

#### 4.3 MEC Destruction

#### Assumptions:

Since a subsurface investigation has not been performed over the entire excavation area, the number of MEC items anticipated remains unknown. Assume 1 BIP per 20 CY of MEC/MD/OD

| Description                     | Unit Rate    | Number of units | Cost     |
|---------------------------------|--------------|-----------------|----------|
| Explosives                      | \$76.70 /BIP | 34 BIPS         | \$2,608  |
| Total Cost for MEC Destruction  |              |                 | \$260.80 |
| Total Cost with H & S Markup of | 10%          |                 | \$2,869  |

#### 4.4 Transportation and Off-Site Disposal of Contaminated Soil

Note: Based on previous investigations, it is assumed that the TCE-contaminated soil will have to be disposed as hazardous.

| Description                                     | Unit Rate     | Number of units | Cost      |
|---|---------------|-----------------|-----------|
| Transportation and Disposal                     | \$165.00 /ton | 2.602 tons      | \$429,330 |
| Total Cost for Transportation and Off-Site Disp | osal          |                 | \$429,330 |
| Total Cost with H & S Markup of                 | 10%           |                 | \$472,263 |

#### 4.5 Transportation and Off-Site Disposal of Non-Hazardous Debris

Note: Based on previous investigations, it is assumed that the majority of MD/OD identified will be non-hazardous and will be recycled at no cost to contractor. Assume 675 CY of scrap metal.

| Subtitle D Landfill with transportation:<br>Estimated volume of non-hazardous waste:<br>Estimated unit weight of non-hazardous waste: |           |                 | \$0.00<br>675<br>0.375 | /ton<br>CY<br>ton/CY |
|---|-----------|-----------------|------------------------|----------------------|
| Tonnage of non-hazardous waste:   |           |                 | 254                    | ton                  |
| Description   | Unit Rate | Number of units |                        | Cost                 |

| Description                                       | Unit Rate   | Number of units | Cost   |
|---|-------------|-----------------|--------|
| Transportation and Disposal                       | \$0.00 /ton | 254 tons        | \$0.00 |
| Total Cost for Transportation and Off-Site Dispos | \$0.00      |                 |        |
| Total Cost with H & S Markup of                   | 10%         |                 | \$0.00 |

#### 4.6 Confirmation Sampling, Soil Profiling for Disposal, and Decon Water Profiling

| Waste Characterization Samples:   | 4  |
|---|----|
| 1 sample for 1st 100cy + 1ea per add'l 200cy  |    |
| Post excavation samples (1 sample per 30 ft of sidewall and 1 sample per 900 sf of excavation bottom) | 10 |
| Decon water:  | 1  |
| Total Number of Samples:  | 15 |

Note: Hazardous waste characterization sampling required under RCRA for disposal includes: TCLP VOCs, TCLP SVOCs, TCLP pesticides/herbicides, TCLP metals, reactivity, corrosivity, and ignitability.

| Description                                    | Unit Rate     | Number of units | Cost    |
|--|---------------|-----------------|---------|
| Post Excavation Sampling                       |               |                 |         |
| Analysis (VOCs only)                           | \$50 /sample  | 10 samples      | \$500   |
| Decon Water Waste                              |               |                 |         |
| Characterization                               | \$420 /sample | 1 samples       | \$420   |
| Hazardous Waste                                |               |                 |         |
| Characterization                               | \$982 /sample | 4 samples       | 3,840   |
| Field samplers and misc sample equipment       | \$125/sample  | 15 Samples      | \$1,875 |
| Total Cost for Confirmation/Profiling Sampling |               |                 | \$6,635 |
| Total Cost with H & S Markup of                | 10%           |                 | \$7,298 |

4

#### 4.7 Site Restoration

Site Restoration activities include backfilling the area with clean overburden, sidewall cutback spoils and certified clean fill; compaction; and slope stabilization.

| Estimated volume of certified clean fill required: | 1,334 CY  |
|--|-----------|
| Including 30% swelling factor                      | 1,734 CY  |
| Total backfill volume:                             | 18,087 CY |
|  |           |

|  |               |                 | Duration |                         |
|--|---------------|-----------------|----------|-------------------------|
| Description  | Unit Rate     | Number of units | (days)   | Cost                    |
| Backfill and compaction  | \$6.62 cy     | 18,087 CY       | 24       | \$119.736               |
| Certified Clean Fill (delivered)                                   | \$14.39/ ton  | 1,734 tons      |          | \$24,935                |
| Compaction testing tech and equipment                              | \$75/hr       |                 | 192 hrs  | \$14,400                |
| Hydromulching  | \$1,874 /acre | 18,087 CY       |          | \$1 874 00              |
| Total Cost for Site Restoration<br>Total Cost with H & S Markup of | 10%           |                 |          | \$160,975<br>\$177,0723 |
| Estimated time required for Site Restoration:                      | 24            | days            |          |                         |

Estimated time required for Site Restoration:

5.0 Mobilization / Demobilization

Mobilization and demobilization consists of providing and removing all required equipment and materials to and from the site. In addition, providing all required utilities is also included with mobilization.

Mobilization is calculated as 10% of the direct capital costs, including site preparations and remedial system installations.

| Mobilization/Demobilization | 10% of capital | \$117,145 |
|-----------------------------|----------------|-----------|
|                             |                |           |

#### 6.0 Construction and Technical Oversight

Field construction oversight will be required for the duration of the project. The duration of the project will include time to construct and remove support facilities (i.e. decon pad, erosion controls), excavation, and site restoration. An H&S Engineer is estimated to provide additional oversight at a rate of 1 day/wk. Due to the site location in an active range area, an additional 10% is applied to the work duration to account for anticipated work restrictions and delays. A similar cost is applied to UXO support for Characterization Sampling, Site Prep, and Excavation; however as base UXO support costs have already been applied in the preceding sections, only the additional 10% is applied here.

#### Estimated total construction time

frame:

| Site preparations:<br>Excavation/Restoration: | 8<br>62 | days<br>days |   |
|---|---------|--------------|---|
| Mob/Demob:                                    | 2       | days         |   |
| Duration (including 10% standby):             | 79      | days         | _ |

| \$5,000        | lump sum<br>lump sum | \$1,000<br>\$5,000 |
|----------------|----------------------|--------------------|
|                |                      | ,                  |
| 100 August 100 | t                    |                    |
| '90 /week   16 | 6 weeks              | \$60,640           |
| 20 /week 3.2   | 2 weeks              | \$16,064           |
|                |                      | \$82.704           |
|                |                      |                    |

All work associated with Remedial Alternative GW-5 to be done using local workforce.

| SUMMARY | OF CAPITAL | COSTS: |
|---------|------------|--------|
|         |            |        |

| 1) Institutional Controls/Planning |          | \$8,600     |
|------------------------------------|----------|-------------|
| 2) Planning, Permitting and Repo   | rting    | \$106,300   |
| 3) Site Preparation                |          | \$19,584    |
| 4) Excavation of Source Material   |          | \$996,658   |
| 5) Mobilization/Demobilization     |          | \$117,145   |
| 6) Construction and Technical O    | versight | \$82,704    |
| Contingency of Scope               | 10%      | \$129,460   |
| Contingency of Bid                 | 5%       | \$64,730    |
| TOTAL CAPITAL COST                 |          | \$1,525,182 |

#### **OPERATION AND MAINTENANCE (O&M) COSTS**

#### 7.0 Long-Term Groundwater and Surface Water Monitoring

The long-term groundwater monitoring would be designed to ensure that the plume characteristics are not changing in an unexpected manor, no new source areas are apparent, regulatory levels are being met, and the plume as a whole is acting as predicted.

The analytical program for the long-term groundwater monitoring program will consist of all of the contaminants of concern in addition to field parameters including dissolved oxygen, pH, Conductivity, Temperature, Turbidity, and ORP. These parameters ensure monitoring of the plume for regulatory compliance as wells as monitoring for changing geochemical and oxidation reduction state. All quality control sample analysis (field duplicates, rinse blanks, trip blanks) are assumed to be 20% of the total number of samples collection (20% of analytical costs).

| For each sampling event, the following unit costs and level of efforts (LOEs) will a | apply:             |
|--|--------------------|
| Field Sampler:   | \$58.00 /hr/person |

| Field Sampler:  | \$58.00  | /hr/person |
|---|----------|------------|
| Number of People:                                       | 2        | people     |
| Hours worked per day:                                   | 10       | hrs        |
| Anticipated time to collect GW samples per location:    | 3.0      | hrs        |
| Number of Wells to Sample for the long-term monitoring: | 12       | wells      |
| Number of Surface Water Samples Collected Per Event:    | 5        | locations  |
| Anticipated time to collect SW samples per location:    | 1.5      | hrs        |
| Data Management cost per sampling event: \$             | 3,000.00 | per event  |
|   |          |            |

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 44 hrs          | \$5,104  |
| Equipment (vehicle, pumps, water quality meter, |                   |                 |          |
| etc.)   | \$1,752 /event    | 1 event         | \$1,752  |
| Chemical Analysis Cost                          |                   |                 |          |
| VOCs (Including TCE, DCE, VC)                   | \$135             | 21 samples      | \$2,835  |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                 | \$2,835  |
| Data Management and Reporting cost              | \$5,000 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per Sampling | g Event           |                 | \$14,691 |

It is assumed that following the first 5 years of the LTM program that the total number of wells to be sampled would be reduced from 12 to 8.

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 32 hrs          | \$3,712  |
| Equipment (vehicle, pumps, water quality meter, | \$1,752 /event    | 1 event         | \$1,752  |
| Chemical Analysis Cost                          |                   |                 |          |
| VOCs (Including TCE, DCE, VC)                   | \$135             | 16 samples      | \$2,160  |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                 | \$2,160  |
| Data Management and Reporting cost              | \$5,000 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per Sampling | Event             |                 | \$12,084 |

#### DESCRIPTION OF COSTS PER PHASE ADJUSTED TO PRESENT VALUE

| Description                                 | Unit Rate           | Number of units | Cost     |
|---|---------------------|-----------------|----------|
| Annual Cost for Semiannual Sampling Years   | 1-5 \$14,691 /event | 2 events        | \$29,382 |
| Using a discount rate of 3.5 <sup>6</sup>   | % for a period of   | 5 years         | \$82,318 |
| Description                                 | Unit Rate           | Number of units | Cost     |
| Annual Cost for Years 6-10 (annual sampling | for 5               |                 |          |

| Annual Cost for Years 6-10 (annu | ual sampling for 5 |                 |          |          |
|----------------------------------|--------------------|-----------------|----------|----------|
| years)                           |                    | \$12,084 /event | 1 events | \$12,084 |
| Using a discount rate of         | 3.5%               | for a period of | 5 years  | \$45,938 |
|                                  |                    |                 |          |          |

Total Discounted Sampling Cost:

Years 1-5

| \$82, | ,31 | 7. | 00 | D |
|-------|-----|----|----|---|
|       |     |    |    |   |

| Years 6-10 | \$45,937.97  |
|------------|--------------|
| Total      | \$128,254.97 |

#### 8.0 Well Construction, Abandonment, and Maintenance

Since LTM will occur over an anticipated period of 10 years, the groundwater monitoring wells will require maintenance to allow for accurate sampling of the aquifer. This will include inspections yearly with maintenance as needed.

| Description   | Unit Rate         | Number of units | Discounted Cost |
|---|-------------------|-----------------|-----------------|
| Well inspection and maintenance   | \$2,158.00 /year  | 10 years        | \$11,901        |
| Future Well abandonment   | \$2,425.00 /well  | 23 wells        | \$39,539        |
| Well Replacement<br>Well replacement will be performed periodica<br>every 5 years for the entire duration of the pro<br>complete. |                   |                 |                 |
|   | Unit Rate         | Number of units | Discounted Cost |
| Description   | Unit Nate         | Number of unita | Discounted Cost |
| Description<br>Well replacement   | \$16,865 / 5 year | 10 years        | \$28,081        |

10.0 Land Use Control Inspections/Sign Repairs/ Construction Support

Construction Support will be required during all intrusive operations (sign replacement, utility repairs, etc). Assumes 40 hours/year of Construction support.

| Description   | Unit Rate    | Number of units | Cost    |  |
|---|--------------|-----------------|---------|--|
| UXO Construction Support – (Tech III)                               | \$4,750/year | lump sum        | \$4,750 |  |
| Land Use Control Inspection/Sign<br>Repairs                         | \$5,575/year | lump sum        | \$5.575 |  |
| Using a discount rate of 3.5% for a period of 50 years \$242,104.08 |              |                 |         |  |

#### 11.0 5-Year Review

Five-year reviews will be performed to assess the effectiveness of the remedy. For the purpose of this FS, the duration for these activities is assumed to be 10 years.

| ption                                  |                    | Unit Rate       | Number of units | Cost     |
|--|--------------------|-----------------|-----------------|----------|
| Review (including draft, draf<br>3)    | t final, and final | \$15,000        | lump sum        | \$15,000 |
| a discount rate of                     | 3.5%               | for a period of | 10 years        | \$73,771 |
| unted O&M Cost:                        |                    |                 |                 |          |
| 10-Year Sampling Cos                   | t                  |                 | \$\$128,255     |          |
| Well Construction, Ab                  |                    | laintenance     | \$79,460        |          |
| LUC Inspection/Constr                  | uction Support     |                 | \$242,1048      |          |
| 5-Year Reviews                         |                    |                 | \$73,771        |          |
| Total                                  |                    |                 | \$523,590       |          |
| TOTAL CAPITAL C                        | OST:               |                 | \$1,525,1       | 82       |
|  |                    |                 |                 | 500      |
| DISCOUNTED O&M                         | I COST:            |                 | \$523,5         | 590 I    |
| DISCOUNTED O&M<br>Contingency of Score |                    | 5%              |                 |          |
|  |                    | 59<br>109       | \$26,17         | 9        |
| Contingency of Scor                    | be:                |                 | \$26,17         | 9<br>9   |

#### ALTERNATIVE 6

#### TOTAL MUNITIONS WASTE PIT REMOVAL, TRICHLOROETHENE SOURCE MATERIAL REMOVAL, MONITORED NATURAL ATTENUATION POLISHING, AND LAND USE CONTROLS

Alternative 6 involves excavation of the entire Munitions Waste Pit, including the assumed source of the plume in the soil overburden; LTM; and the maintenance and enforcement of ICs, in particular the restrictions of groundwater uses and long-term groundwater monitoring for all parameters that exceeded the SCLs, and the requirement for construction support in the uncleared areas of the MRS. It is assumed that ICs and the long- term groundwater monitoring would be performed for 10 years. The anticipated length of LTM will be reevaluated following review of the groundwater sampling results, and evaluation of site-specific attenuation rates.

#### GENERAL ASSUMPTIONS

1) The costs are adopted from previous work conducted by ECC and professional judgment.

2) The costs are adjusted with a location factor for Dover, New Jersey

3) The costs and duration of the construction activities are based on an 8-hour 5-day per week working schedule, unless otherwise noted.

4) Work is to be conducted under a safety level D condition. However, a general health and safety markup of 10% will be used to account for modification of safety level condition, where appropriate

5) For activities requiring construction support, the team will consist of: 1 truck driver, 2 laborers, 1 Tech 3,1 Tech 2, and 2 Operators (Tech 2).

6) For activities requiring MEC screening, the team will consist of: 1 truck driver, 2 laborers, SUXOS, UXOSO/QCS, 1 Tech 3, 2 Tech 2, 2 Tech 2, and 3 Operators (Tech 2).

7) Preliminary estimate of the entire waste pit area is approximately 10,500 SF with a total depth of approximately 25 ft bgs. Volume of landfill: 9,723 CY, Volume of clean overburden and cutback: 26,852 CY

#### CAPITAL COSTS

#### 1.0 Institutional Controls/Planning

Land Use Restrictions: A site-specific Land Use Control Implementation Plan (LUCIP) will need to be written in order to place restrictions on activities that can be performed in areas of the plumes at the 600 Area Sites. These restrictions can be enforced through existing institutional controls and by restricting future land use. The land use restrictions will ensure that potential receptors are not exposed to contaminated groundwater from the 600 Area plumes.

| Description                               | Unit Rate       | Number of units | Cost    |
|---|-----------------|-----------------|---------|
| LCUP Preparation                          | \$8,600         | Lump Sum        | \$8,600 |
| Total Cost For the Land Use Control Imple | mentation Plan: |                 | \$8,600 |

#### 2.0 Planning, Permitting and Reporting

Deliverables will include work plan, health and safety plan and a closure report. In addition, the substantive requirements for a Classification Exemption Area submittal will need to be made.

| Description  | Unit Rate | Number of Units | Cost     |
|--|-----------|-----------------|----------|
| Permit equivalents                                 | \$2,000   | Lump Sum        | 5,300    |
| Design documents (drawings, specifications, design |           |                 |          |
| basis) - draft, draft final, and final             | \$27,700  | Lump Sum        | 27,700   |
| Work Plan  | \$20,000  | Lump Sum        | 20,000   |
| Explosive Safety Submission                        | \$6,700   | Lump Sum        | 6,700    |
| Health and Safety Plan                             | \$9,000   | Lump Sum        | 9,000    |
| FSP, QAPP, and DQOs                                | \$17,400  | Lump Sum        | 17,400   |
| Closeout Report (Draft, Draft Final, Final)        | \$11,600  | Lump Sum        | 11,600   |
| Total Cost for Reporting                           |           |                 | \$97,700 |

Summary of Institutional Control/Planning Costs

| Description  | Cost      |
|--|-----------|
| Total Cost For Institutional Controls Plan Amendments: | \$8,600   |
| Total Cost For Planning, Permitting, and Reporting     | \$97,700  |
| Total Capital Cost for Institutional Controls:         | \$106,300 |

#### 3.0 Site Preparation

#### 3.1 Erosion Control

Prior to start of work, silt fence will be erected along the perimeter of the work areas. In addition to the assumed 60' x 120' source area, a 1:2 slope will be required for side wall stabilization. For an overall depth of 25' bgs. the resulting cutback is 50', yielding a 160' x 220' work area.

Silt fence will be maintained in an erect position and cleaned as required to ensure efficiency.

Required length of silt fence (110% of work area perimeter): 1,276 LF

| Description                  | Unit Rate       | Number of units | Duration | Cost       |
|------------------------------|-----------------|-----------------|----------|------------|
| Silt fencing, polypropylene, | \$3.39 /lf      | 1,276 lf        | 2        | \$4,325    |
| MEC Support (2 person team)  | \$1,800.00 /day |                 | 2        | \$3,600.00 |
| Total Erosion Control Cost   |                 |                 |          | \$7,925    |
|                              |                 |                 |          |            |

2 days

Estimated time required for Silt Fence Construction =

3.2 Layout and Construction Survey

The purpose of a layout/construction survey is to assure that the proper amount of cover materials are in place. The work will consist of furnishing, placing, and maintaining the construction layout controls (stakes) necessary.

#### Assumptions:

1) Survey crew used to perform the construction layout survey will require a two person crew.

| - /.    |              |    |
|---------|--------------|----|
| 50 /day | 5 days \$6,2 | 50 |
| T T     | \$6,2        | 50 |
|         | 50 /uay      |    |

Estimated Number of days required =

5 days

#### 3.3 Site Setup/ Vehicle and Personnel Decontamination Area

The 4,000 sf decontamination facility will be constructed using a geomembrane liner to contain liquids generated during the decontamination activities. The liner will be placed directly on the ground surface. Sand will be used to smooth the existing terrain. Assumes no site trailer or utility hookups required, due to short duration of field work.

| Vehicle and Personnel Decon Area Cost         | Total     |                 |          | 40,700  |
|---|-----------|-----------------|----------|---------|
|   | Total     |                 |          | \$8,700 |
|   | \$8,700   | Lump Sum        |          | \$8,700 |
| Material and Installation costs for Decon Pad |           |                 |          |         |
| Description                                   | Unit Rate | Number of units | (days)   | Cost    |
|   |           |                 | Duration | -       |

Estimated time required for Decon Area Construction =

6 days

### 4.0 Excavation and Disposal of Source Material

#### 4.1 Excavation of Material Requiring Construction Support

#### Assumptions:

Soil will be excavated using an excavator that will load directly into end dump trucks or staging area. The excavation rate and unit cost have been selected based on ECC experience and professional judgment to account for difficult terrain, site accessibility, and anticipated MEC clearance activities. In areas where the MEC/MD is not likely (i.e., clean overburden and sidewall cutback), construction support activities will be required. This will consist of having two UXO technicians visually observing the excavation. Excavation will proceed in six inch lifts such that debris will be observed if present. One UXO team member will be located to the rear and upwind of the excavation equipment and will visually observe excavation. Assume 22,136 CY of clean overburden, sidewall cutback soil and existing stockpiled material require construction support. Assume 580 CY/day during construction support activities.

Clean overburden and sidewall cutback spoils will be staged and used as backfill following confirmation sampling. Total excavated volume requiring construction support: 22136 CY

| Description   | Unit Rate     | Dur | ation | Cost                  |
|---|---------------|-----|-------|-----------------------|
| Excavator, Track, 19 to 21 Metric Tons, JDeere<br>200CLC/Komstsu PC200  | \$314 /day    | 38  | days  | \$11,932              |
| Two - Truck, 6X4,10-wheel End Dump, 12-14 CY,<br>70,000-lb. GVW, Diesel | \$410/day     | 38  | days  | \$15,580              |
| Misc Equipment/fuel   | \$540.00 /day | 38  | days  | \$20,520              |
| Construction Support Team   | \$4,198 /day  | 38  | days  | \$159,524             |
| Total Cost for Source Material Excavation                               |               |     |       | \$20,755<br>\$228,312 |

#### 4.2 Excavation of Material Requiring Screening of Excavated Soil for MEC/MD

#### Assumptions:

Excavation of the entire Inactive Munitions Waste Pit landfill (approximately 9,526 CY), including transport and disposal of approximately 1,334 cubic yards (CY) of TCE contaminated soil will require screening for MEC/MD and certification as safe prior to disposal. It is assumed that the screening process will involve laying out soil to be screened in 6-inch lifts and visually inspected (aided by the use of a Schonstedt) by a team of UXO Technicians. MEC/MD screening will take place simultaneously with the excavation. Assume 150 CY/day during construction support activities.

| Total excavated volume requiring MEC/MD screening:                                  |          |        | 9526 | CY    |                       |
|---|----------|--------|------|-------|-----------------------|
| Description Cost Code   | Uni      | t Rate | Dura | ation | Cost                  |
| Excavator, Track, 19 to 21 Metric Tons, JDeere<br>200CLC/Komstsu PC200              | \$314/da | у      | 65   | days  | \$20,410              |
| Two -Truck, 6X4,10-wheel End Dump, 12-14 CY, 70,000-                                | \$410/da | y      | 65   | days  | \$26,650              |
| oader, Articulating, 3.00 CY, (Rental) John Deere 544J,                             | \$215    | /day   | 65   | days  | \$13,975              |
| Dozer, Standard Crawler, 90-99 HP, (Rental) John Deere<br>650J, Cat D5 Komatsu D39P | \$200    | /day   | 65   | days  | \$13,000              |
| /isc Equipment/fuel   | \$719    | /day   | 65   | days  | \$46,746              |
| IEC and Construction Support Team   | \$7,995  | /dav   | 65   | days  | \$519.675             |
| Additional H & S Markup of<br>Cost for MEC/MD screening                             | 10% To   |        |      |       | \$64,045<br>\$704,502 |

Estimated time required for Excavation =

#### 4.3 MEC Destruction

#### Assumptions:

Since a subsurface investigation has not been performed over the entire excavation area, the number of MEC items anticipated remains unknown. Assume 1 BIP per 20 CY of MEC/MD/OD

| Description                    | Unit Rate    | Number of units | Cost     |
|--------------------------------|--------------|-----------------|----------|
| Explosives                     | \$67.70 /BIP | 146 BIPS        | \$9,882  |
| Additional H & S Markup of     | 10%          |                 | \$982    |
| Total Cost for MEC Destruction |              |                 | \$10,880 |

#### 4.4 Transportation and Off-Site Disposal of Contaminated Soil

Note: Based on previous investigations, it is assumed that the TCE contaminated soil will have to be disposed as hazardous.

| Subtitle C Landfill with transportation:<br>Estimated unit weight of contaminated soil:<br>Tonnage of Subtitle C soil, including | 30% swelling t | factor:         | \$200.00<br>1.5<br>2,602 | /ton<br>ton/CY<br>ton |
|--|----------------|-----------------|--------------------------|-----------------------|
| Description  | Unit Rate      | Number of units |                          | Cost                  |
| Transportation and Disposal  | \$165 /ton     | 2,602 tons      |                          | \$420,330             |
| Additional H & S Markup of<br>Total Cost for MEC/MD screening  | 10%            |                 |                          | \$42,933<br>\$463,263 |

#### 4.5 Transportation and Off-Site Disposal of Non-Hazardous Debris

Note: Based on previous investigations, it is assumed that the majority of MD/OD identified will be non-hazardous and will be recycled at no cost to contractor. Assume 2917 CY of scrap metal.

| Subtitle D Landfill with transportation:<br>Estimated volume of non-hazardous waste:<br>Estimated unit weight of non-hazardous waste: |             |                 | \$0.00<br>2917<br>0.375 | /ton<br>CY<br>ton/CY |
|---|-------------|-----------------|-------------------------|----------------------|
| Tonnage of non-hazardous waste:   |             |                 | 1,094                   | ton                  |
| Description   | Unit Rate   | Number of units |                         | Cost                 |
| Transportation and Disposal   | \$0.00 /ton | 1,094 tons      |                         | \$0.00               |
| Total Cost for Transportation and Off-Site Dispose<br>Total Cost with H & S Markup of   | al<br>10%   |                 |                         | \$0.00<br>\$0.00     |

#### 4.6 Confirmation Sampling, Soil Profiling for Disposal, and Decon Water Profiling

| Waste Characterization Samples:   | 48 |
|---|----|
| 1 sample for 1st 100cy + 1ea per add'l 200cy  |    |
| Post excavation samples (1 sample per 30 ft of sidewall and 1 sample per 900 sf of excavation bottom) | 10 |
| Decon water:  | 1  |
| Total Number of Samples:  | 59 |
|   |    |

Note: Hazardous waste characterization sampling required under RCRA for disposal includes: TCLP VOCs, TCLP SVOCs, TCLP pesticides/herbicides, TCLP metals, reactivity, corrosivity, and ignitability.

| Description   | Unit Rate        | Number of units | Cost                 |
|---|------------------|-----------------|----------------------|
| Post Excavation Sampling  |                  |                 |                      |
| Analysis (VOCs only)  | \$50.00 /sample  | 10 samples      | \$500                |
| Decon Water Waste   |                  |                 |                      |
| Characterization  | \$420.00 /sample | 1 samples       | \$730                |
| Hazardous Waste   |                  |                 |                      |
| Characterization  | \$982.00 /sample | 48 samples      | \$47,136             |
| Field samplers and misc sample equipment  | \$125/sample     | 60 Samples      | \$7,500              |
| Total Cost for Confirmation/Profiling Sampling<br>Total Cost with H & S Markup of | 10%              |                 | \$55,966<br>\$61,453 |

#### 4.7 Site Restoration

Site Restoration activities include backfilling the area with clean overburden, sidewall cutback spoils and certified clean fill; compaction; and slope stabilization.

| Estimated volume of certified clean fill required: | 1,334 CY  |
|--|-----------|
| Including 30% swelling factor                      | 1,734 CY  |
| Total backfill volume:                             | 36,575 CY |

|  |               |                 | Duration |                        |
|--|---------------|-----------------|----------|------------------------|
| Description  | Unit Rate     | Number of units | (days)   | Cost                   |
| Backfill and compaction  | \$6.62 cy     | 36,575 CY       | 48       | \$242,126              |
| Certified Clean Fill (delivered)                                   | \$14.39/ ton  | 1,734 tons      |          | \$24,952               |
| Compaction testing tech and equipment                              | 75.00/hr      |                 | 384 hrs  | \$28,800               |
| Hydromulching  | \$1,874 /acre | 1 acre          |          | \$1,874                |
| Total Cost for Site Restoration<br>Total Cost with H & S Markup of | 10%           |                 |          | \$295,879<br>\$325,466 |

Estimated time required for Site Restoration:

48 days

#### 5.0 Mobilization / Demobilization

Mobilization and demobilization consists of providing and removing all required equipment and materials to and from the site. In addition, providing all required utilities is also included with mobilization.

Mobilization is calculated as 5% of the direct capital costs, including site preparations and remedial system installations.

| Mobilization/Demobilization | 10% of capital | \$157,448 |
|-----------------------------|----------------|-----------|
| INIODITZALION/DEMODILZALION |                | J 137,440 |
|                             |                |           |

#### 6.0 Construction and Technical Oversight

Field construction oversight will be required for the duration of the project. The duration of the project will include time to construct and remove support facilities (i.e. decon pad, erosion controls), excavation, MEC Clearance, and site restoration. An H&S Engineer is estimated to provide additional oversight at a rate of 1 day/wk. Due to the site location in an active range area, an additional 10% is applied to the work duration to account for anticipated work restrictions and delays. A similar cost is applied to UXO support for Characterization Sampling, Site Prep, and Excavation; however as base UXO support costs have already been applied in the preceding sections, only the additional 10% is applied here.

| Estimated total construction time<br>frame: | Site preparations:<br>Excavation/Resto | ration:         | 9<br>151 | days<br>days |           |
|---|--|-----------------|----------|--------------|-----------|
|   | Mob/Demob:                             |                 | 2        | days         |           |
|   | Duration (including                    | g 10% standby): | 179      | days         |           |
|   |  |                 |          |              |           |
| Description                                 |  | Unit Rate       | Numbe    | r of units   | Cost      |
| Data Review                                 |  | \$1,000         | lum      | p sum        | \$1,000   |
| Site Visit and Meeting                      |  | \$5,000         | lum      | p sum        | \$5,000   |
| Field Engineer                              |  | \$3,790/week    | 36       | weeks        | \$136,440 |
| H&S Engineer                                |  | \$5,020 /week   | 7.2      | weeks        | \$36,144  |

| Total Cost for Construction and Oversight | <br> | \$178,584 |
|---|------|-----------|

All work associated with Remedial Alternative 6 to be done using local workforce.

| SUMMARY OF CAPITAL COSTS:               |             |
|---|-------------|
| 1) Institutional Controls/Planning      | \$86000     |
| 2) Planning, Permitting and Reporting   | \$97,700    |
| 3) Site Preparation                     | \$22,875    |
| 4) Excavation of Source Material        | \$1,793,877 |
| 5) Mobilization/Demobilization          | \$165,425   |
| 6) Construction and Technical Oversight | \$157,448   |
| Contingency of Scope 10%                | \$232,392   |
| Contingency of Bid 5%                   | \$116,196   |
| TOTAL CAPITAL COST                      | \$2,671,913 |

#### OPERATION AND MAINTENANCE (O&M) COSTS

#### 7.0 Long-Term Groundwater and Surface Water Monitoring

The long-term groundwater monitoring would be designed to ensure that the plume characteristics are not changing in an unexpected manor, no new source areas are apparent, regulatory levels are being met, and the plume as a whole is acting as predicted.

The analytical program for the long-term groundwater monitoring program will consist of all of the contaminants of concern in addition to field parameters including dissolved oxygen, pH, Conductivity, Temperature, Turbidity, and ORP. These parameters ensure monitoring of the plume for regulatory compliance as wells as monitoring for changing geochemical and oxidation reduction state. All quality control sample analysis (field duplicates, rinse blanks, trip blanks) are assumed to be 20% of the total number of samples collection (20% of analytical costs).

For each sampling event, the following unit costs and level of efforts (LOEs) will apply:

| F | Field Sampler:  |
|---|---|
| ľ | Number of People:                                       |
| ł | lours worked per day:                                   |
| 1 | Anticipated time to collect GW samples per location:    |
| ľ | Number of Wells to Sample for the long-term monitoring: |
| 1 | Number of Surface Water Samples Collected Per Event:    |
| 1 | Anticipated time to collect SW samples per location:    |
| í | Data Management cost per sampling event:                |
|   |   |

| apply:     |            |
|------------|------------|
| \$58.00    | /hr/person |
| 2          | people     |
| 10         | hrs        |
| 3.0        | hrs        |
| 12         | wells      |
| 5          | locations  |
| 1.5        | hrs        |
| \$5,000.00 | per event  |

| Description   | Unit Rate            | Number of units | Cost     |
|---|----------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                              |                      |                 |          |
| Labor for chemical sampling                           | \$58 /hr/person      | 44 hrs          | \$5,104  |
| Equipment (vehicle, pumps, water quality meter,       | 1                    |                 |          |
| etc.)   | \$1,752 /event       | 1 event         | \$1,752  |
| Chemical Analysis Cost                                |                      |                 |          |
| VOCs (Including TCE, DCE, VC)                         | \$135                | 21 samples      | \$2,835  |
| TOTAL CHEMICAL ANALYSIS COST:                         |                      |                 | \$2,835  |
| Data Management and Reporting cost                    | \$5,000.00 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per Sampling Event |                      |                 | \$14,691 |

It is assumed that following the first 5 years of the LTM program that the total number of wells to be sampled would be reduced from 12 to 8.

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 32 hrs          | \$3,712  |
| Equipment (vehicle, pumps, water quality meter, | \$1,752 /event    | 1 event         | \$1,752  |
| Chemical Analysis Cost                          |                   |                 |          |
| VOCs (Including TCE, DCE, VC)                   | \$135.00          | 16 samples      | \$2,160  |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                 | \$2,160  |
| Data Management and Reporting cost              | \$5,000 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per Sampling | j Event           |                 | \$12,084 |

#### DESCRIPTION OF COSTS PER PHASE ADJUSTED TO PRESENT VALUE

|                                  |                   | for a period of |                 | \$45,938 |
|----------------------------------|-------------------|-----------------|-----------------|----------|
| years)                           |                   | \$12,084 /event | 1 events        | \$12,084 |
| Annual Cost for Years 6-10 (annu | al sampling for 5 |                 |                 |          |
| Description                      |                   | Unit Rate       | Number of units | Cost     |
| Using a discount rate of         | 3.5%              | for a period of | 5 years         | \$82,318 |
| Annual Cost for Semiannual Sam   | pling Years 1-5   | \$14,691 /event | 2 events        | \$29,382 |
| Description                      |                   | Unit Rate       | Number of units | Cost     |

Total Discounted Sampling Cost:

| Years 1-5  | \$82,318  |
|------------|-----------|
| Years 6-10 | \$45,938  |
| Total      | \$128,255 |

## 8.0 Well Construction, Abandonment, and Maintenance

Since LTM will occur over an anticipated period of 10 years, the groundwater monitoring wells will require maintenance to allow for accurate sampling of the aquifer. This will include inspections yearly with maintenance as needed.

| \$2,158 /year<br>\$2,425 /well<br>needed. For the purpose of<br>UXO support will be require: |                              |                           |
|--|------------------------------|---------------------------|
| needed. For the purpose of   | f this FS, the well replacem | ent is assumed to occu    |
|  |                              |                           |
|  |                              | take 2 days to            |
| Unit Rate  | Number of units              | Discounted Cost           |
|  | 10 years                     | \$28,081                  |
|  | Linit Rate                   | Unit Rate Number of units |

Discount Rate = 3.5%

#### 10.0 Land Use Control Inspections/Sign Repairs/ Construction Support

Construction Support will be required during all intrusive operations (sign replacement, utility repairs, etc). Assumes 40 hours/year of Construction support.

| Description   | Unit Rate    | Number of units | Cost    |  |
|---|--------------|-----------------|---------|--|
| UXO Construction Support – (Tech III)                                     | \$4,750/year | lump sum        | \$4,750 |  |
| Land Use Control Inspection/Sign \$5,575/year lump sum \$5.575<br>Repairs |              |                 |         |  |
| Using a discount rate of 3.5% for a period of 50 years \$242,105          |              |                 |         |  |

#### 11.0 5-Year Review

Five-year reviews will be performed to assess the effectiveness of the remedy. For the purpose of this FS, the duration for these activities is assumed to be 10 years.

| Description   | Unit Rate | Number of   | С        |
|---|-----------|-------------|----------|
| 5-Year Review (including draft, draft final, and final reports) | \$15,000  | lump<br>sum | \$15,000 |
| Using a discount rate of 3.5% for a period of                   |           |             |          |

Discounted O&M Cost:

| Year Sampling Cost<br>Il Construction, Abandonment, and Maintenance<br>C Inspection/Construction Support<br>/ear Reviews<br>tal |     | \$128,255<br>\$79,460<br>\$242,105<br>\$73,772<br>\$523,590 |  |
|---|-----|---|--|
| TOTAL CAPITAL COST:   |     | \$2,671,913   |  |
| DISCOUNTED O&M COST:  |     | \$523,590   |  |
| Contingency of Scope:   | 5 % | \$26,179  |  |
| Contingency of Bid:   | 10% | \$52,359  |  |
| TOTAL DISCOUNTED O&M COST:  |     | \$602,128   |  |
| TOTAL PRESENT WORTH VALUE:  |     | \$3,274,041   |  |

### ALTERNATIVE 7

#### TOTAL MUNITIONS WASTE PIT REMOVAL, TRICHLOROETHENE SOURCE MATERIAL REMOVAL, MONITORED NATURAL ATTENUATION POLISHING, LAND USE CONTROLS, AND MUNITIONS AND EXPLOSIVES OF CONCERN CLEARANCE OF ENTIRE MUNITIONS RESPONSE SITE

Alternative 7 involves excavation of the entire Munitions Waste Pit, including the assumed source of the plume in the soil overburden; LTM; and the maintenance and enforcement of ICs, in particular the restrictions of groundwater uses and long-term groundwater monitoring for all parameters that exceeded the SCLs. It is assumed that ICs and the long- term groundwater monitoring would be performed for 10 years. The anticipated length of LTM will be reevaluated following review of the groundwater sampling results, and evaluation of site-specific attenuation rates.

#### GENERAL ASSUMPTIONS

1) The costs are adopted from previous work conducted by ECC and professional judgment.

2) The costs are adjusted with a location factor for Dover, New Jersey

3) The costs and duration of the construction activities are based on an 8-hour 5-day per week working schedule, unless otherwise noted.

4) Work is to be conducted under a safety level D condition. However, a general health and safety markup of 10% will be used to account for modification of safety level condition, where appropriate 10%

5) For activities requiring construction support, the team will consist of: 1 truck driver, 2 laborers, 1 Tech 3,1 Tech 2, and 2 Operators (Tech 2).

6) For activities requiring MEC screening, the team will consist of: 1 truck driver, 2 laborers, SUXOS, UXOSO/QCS, 1 Tech 3, 2 Tech 2, 2 Tech 2, and 3 Operators (Tech 2).

7) Preliminary estimate of the entire waste pit area is approximately 10,500 SF with a total depth of approximately 25 ft bgs. Volume of landfill: 9,723 CY, Volume of clean overburden and cutback: 26,852 CY

#### CAPITAL COSTS

#### 1.0 Institutional Controls/Planning

Land Use Restrictions: A site-specific Land Use Control Implementation Plan (LUCIP) will need to be written in order to place restrictions on activities that can be performed in areas of the plumes at the 600 Area Sites. These restrictions can be enforced through existing institutional controls and by restricting future land use. The land use restrictions will ensure that potential receptors are not exposed to contaminated groundwater from the 600 Area plumes.

| Description                               | Unit Rate       | Number of units | Cost    |
|---|-----------------|-----------------|---------|
| LCUP Preparation                          | \$8,600         | Lump Sum        | \$8,600 |
| Total Cost For the Land Use Control Imple | mentation Plan: |                 | \$8,600 |

#### 2.0 Planning, Permitting and Reporting

Deliverables will include work plan, health and safety plan and a closure report. In addition, the substantive requirements for a Classification Exemption Area submittal will need to be made.

| Description  | Unit Rate | Number of Units                       | Cost     |
|--|-----------|---------------------------------------|----------|
| Permit equivalents                                 | \$2,000   | Lump Sum                              | 5,300    |
| Design documents (drawings, specifications, design |           |                                       |          |
| basis) - draft, draft final, and final             | \$27,700  | Lump Sum                              | 27,700   |
| Work Plan  | \$20,000  | Lump Sum                              | 20,000   |
| Explosive Safety Submission                        | \$6,700   | Lump Sum                              | 6,700    |
| Health and Safety Plan                             | \$9,000   | Lump Sum                              | 9,000    |
| FSP, QAPP, and DQOs                                | \$17,400  | Lump Sum                              | 17,400   |
| Closeout Report (Draft, Draft Final, Final)        | \$11,600  | Lump Sum                              | 11,600   |
| Total Cost for Reporting                           |           | · · · · · · · · · · · · · · · · · · · | \$97,700 |

Summary of Institutional Control/Planning Costs

| Description  | Cost      |
|--|-----------|
| Total Cost For Institutional Controls Plan Amendments: | \$8,600   |
| Total Cost For Planning, Permitting, and Reporting     | \$97,700  |
| Total Capital Cost for Institutional Controls:         | \$106,300 |

#### 3.0 Site Preparation

#### 3.1 Erosion Control

Prior to start of work, silt fence will be erected along the perimeter of the work areas. In addition to the assumed 60' x 120' source area, a 1:2 slope will be required for side wall stabilization. For an overall depth of 25' bgs, the resulting cutback is 50', yeilding a 160' x 220' work area.

Silt fence will be maintained in an erect position and cleaned as required to ensure efficiency.

Required length of silt fence (110% of work area perimeter): 1.276 LF

| Description                  | Unit Rate       | Number of units | Duration | Cost       |
|------------------------------|-----------------|-----------------|----------|------------|
| Silt fencing, polypropylene, | \$3.39 /lf      | 1,276 lf        | 2        | \$4,325    |
| MEC Support (2 person team)  | \$1,800.00 /day |                 | 2        | \$3,600.00 |
| Total Erosion Control Cost   |                 |                 |          | \$7,925    |
|                              |                 |                 |          |            |

Estimated time required for Silt Fence Construction =

2 days

#### 3.2 Layout and Construction Survey

The purpose of a layout/construction survey is to assure that the proper amount of cover materials are in place. The work will consist of furnishing, placing, and maintaining the construction layout controls (stakes) necessary.

#### Assumptions:

1) Survey crew used to perform the construction layout survey will require a two person crew.

| Description             | Cost Code | Unit Rate    | Number of units | Cost    |
|-------------------------|-----------|--------------|-----------------|---------|
| Surveying Crew, 2 perso | n survey  | \$1,250 /day | 5 days          | \$6,250 |
| Total Cost for Survey C | rew       |              |                 | \$6,250 |

Estimated Number of days required =

5 days

#### 3.3 Site Setup/ Vehicle and Personnel Decontamination Area

The 4,000 sf decontamination facility will be constructed using a geomembrane liner to contain liquids generated during the decontamination activities. The liner will be placed directly on the ground surface. Sand will be used to smooth the existing terrain. Assumes no site trailer or utility hookups required, due to short duration of field work.

| Description                                   | Unit Rate | Number of units | Duration<br>(days) | Cost    |
|---|-----------|-----------------|--------------------|---------|
| Material and Installation costs for Decon Pad | \$8,700   | Lump Sum        |                    | \$8,700 |
| Vehicle and Personnel Decon Area Cost         | Total     | Lump Sum        |                    | \$8,700 |

Estimated time required for Decon Area Construction =

6 days

#### ALTERNATIVE 7

#### TOTAL MUNITIONS WASTE PIT REMOVAL, TRICHLOROETHENE SOURCE MATERIAL REMOVAL, MONITORED NATURAL ATTENUATION POLISHING, LAND USE CONTROLS, AND MUNITIONS AND EXPLOSIVES OF CONCERN CLEARANCE OF ENTIRE MUNITIONS RESPONSE SITE

4.0 Excavation and Disposal of Source Material

4.1 Excavation of Material Requiring Construction Support

#### Assumptions:

Soil will be excavated using an excavator that will load directly into end dump trucks or staging area. The excavation rate and unit cost have been selected based on ECC experience and professional judgment to account for difficult terrain, site accessibility, and anticipated MEC clearance activities. In areas where the MEC/MD is not likely (i.e., clean overburden and sidewall cutback), construction support activities will be required. This will consist of having two UXO technicians visually observing the excavation. Excavation will proceed in six inch lifts such that debris will be observed if present. One UXO team member will be located to the rear and upwind of the excavation equipment and will visually observe excavation. Assume 22,136 CY of clean overburden, sidewall cutback and stockpiled soil require construction support. Assume 580 CY/day during construction support activities.

Clean overburden and sidewall cutback spoils will be staged and used as backfill following confirmation sampling. Total excavated volume requiring construction support: 22136 CY

| Description   | Unit Rate     | Dur | ation | Cost      |
|---|---------------|-----|-------|-----------|
| Excavator, Track, 19 to 21 Metric Tons, JDeere<br>200CLC/Komstsu PC200  | \$314 /day    | 38  | days  | \$11,932  |
| Two - Truck, 6X4,10-wheel End Dump, 12-14 CY,<br>70,000-lb. GVW, Diesel | \$410/day     | 38  | days  | \$15,580  |
| Misc Equipment/fuel   | \$540.00 /day | 38  | days  | \$20,520  |
| Construction Support Team   | \$4,198 /day  | 38  | days  | \$159,524 |
| Total Cost for Source Material Excavation                               |               |     |       |           |

#### 4.2 Excavation of Material Requiring Screening of Excavated Soil for MEC/MD

#### Assumptions:

Excavation of the entire Inactive Munitions Waste Pit landfill (approximately 9,625 CY), including transport and disposal of approximately 1,334 cubic yards (CY) of TCE contaminated soil will require screening for MEC/MD and certification as safe prior to disposal. It is assumed that the screening process will involve laying out soil to be screened in 6-inch lifts and visually inspected (aided by the use of a Schonstedt) by a team of UXO Technicians. MEC/MD screening will take place simultaneously with the excavation. Assume 150 CY/day during construction support activities.

| Total excavated volume requiring MEC/MD scree                                    | ning:             | 9526 CY  |                       |
|--|-------------------|----------|-----------------------|
| Description Cost Code  | Unit Rate         | Duration | Cost                  |
| Excavator, Track, 19 to 21 Metric Tons, JDeere 200CLC/Komstsu PC200              | \$314/day         | 65 days  | \$20,410              |
| Two -Truck, 6X4,10-wheel End Dump, 12-14 CY, 70,0                                | \$410/day<br>000- | 65 days  | \$26,650              |
| Loader, Articulating, 3.00 CY, (Rental) John Deere 54                            |                   | 65 davs  | \$13,975              |
| Dozer, Standard Crawler, 90-99 HP, (Rental) John De<br>650J, Cat D5 Komatsu D39P | sere \$200 /day   | 65 days  | \$13,000              |
| Misc Equipment/fuel  | \$719 /day        | 65 days  | \$46,746              |
| MEC and Construction Support Team  | \$7,995 /day      | 65 days  | \$519,675             |
| Additional H & S Markup of<br>Cost for MEC/MD screening                          | 10% Total         |          | \$64,045<br>\$704,502 |

Estimated time required for Excavation =

65 days

#### 4.3 MEC Destruction

#### Assumptions:

Since a subsurface investigation has not been performed over the entire excavation area, the number of MEC items anticipated remains unknown. Assume 1 BIP per 20 CY of MEC/MD/OD

| Description                    | Unit Rate    | Number of units | Cost     |
|--------------------------------|--------------|-----------------|----------|
| Explosives                     | \$67.70 /BIP | 146 BIPS        | \$9,882  |
| Additional H & S Markup of     | 10%          |                 | \$982    |
| Total Cost for MEC Destruction |              |                 | \$10,880 |

#### 4.4 Transportation and Off-Site Disposal of Contaminated Soil

Note: Based on previous investigations, it is assumed that the TCE contaminated soil will have to be disposed as hazardous.

| Subtitle C Landfill with transportation:<br>Estimated unit weight of contaminated soil:<br>Tonnage of Subtitle C soil, including | 30% swelling t | factor:         | \$200.00<br>1.5<br>2,602 | /ton<br>ton/CY<br>ton |
|--|----------------|-----------------|--------------------------|-----------------------|
| Description  | Unit Rate      | Number of units |                          | Cost                  |
| Transportation and Disposal  | \$165 /ton     | 2,602 tons      |                          | \$420,330             |
| Additional H & S Markup of<br>Total Cost for MEC/MD screening  | 10%            |                 |                          | \$42,933<br>\$463,263 |

#### 4.5 Transportation and Off-Site Disposal of Non-Hazardous Debris

Note: Based on previous investigations, it is assumed that the majority of MD/OD identified will be non-hazardous and will be recycled at no cost to contractor. Assume 2917 CY of scrap metal.

| Subtitle D Landfill with transportation:<br>Estimated volume of non-hazardous waste:<br>Estimated unit weight of non-hazardous waste:<br>Tonnage of non-hazardous waste: |                  |                 | \$0.00<br>2917<br>0.375<br>1,094 | /ton<br>CY<br>ton/CY<br>ton |
|--|------------------|-----------------|----------------------------------|-----------------------------|
| Description  | Unit Rate        | Number of units |                                  | Cost                        |
| Transportation and Disposal  | \$0.00 /ton      | 1,094 tons      |                                  | \$0.00                      |
| Total Cost for Transportation and Off-Site Dispos<br>Total Cost with H & S Markup of   | \$0.00<br>\$0.00 |                 |                                  |                             |

#### 4.6 Confirmation Sampling, Soil Profiling for Disposal, and Decon Water Profiling

| racterization Samples:   | 48      |
|--|---------|
| 1 sample for 1st 100cy + 1ea per add'l 200cy   |         |
| ation samples (1 sample per 30 ft of sidewall and 1 sample per 900 sf of excavation bottom)  | 10      |
| er:  | 1       |
| per of Samples:  | 59      |
| 1 sample for 1st 100cy + 1ea per add'l 200cy<br>ation samples (1 sample per 30 ft of sidewall and 1 sample per 900 sf of excavation bottom)<br>er: | 10<br>1 |

Note: Hazardous waste characterization sampling required under RCRA for disposal includes: TCLP VOCs, TCLP SVOCs, TCLP pesticides/herbicides, TCLP metals, reactivity, corrosivity, and ignitability.

| Description   | Unit Rate        | Number of units | Cost                 |
|---|------------------|-----------------|----------------------|
| Post Excavation Sampling  |                  |                 |                      |
| Analysis (VOCs only)  | \$50.00 /sample  | 10 samples      | \$500                |
| Decon Water Waste   |                  |                 |                      |
| Characterization  | \$420.00 /sample | 1 samples       | \$730                |
| Hazardous Waste   |                  |                 |                      |
| Characterization  | \$982.00 /sample | 48 samples      | \$47,136             |
| Field samplers and misc sample equipment  | \$125/sample     | 60 Samples      | \$7,500              |
| Total Cost for Confirmation/Profiling Sampling<br>Total Cost with H & S Markup of | 10%              |                 | \$55,966<br>\$61,453 |

#### 4.7 Site Restoration

Site Restoration activities include backfilling the area with clean overburden, sidewall cutback spoils and certified clean fill; compaction; and slope stabilization

| Estimated volume of certified clean fill required: | 1,334 CY  |
|--|-----------|
| Including 30% swelling factor                      | 1,734 CY  |
| Total backfill volume:                             | 36,575 CY |

|  |               |                 | Duration |                                    |
|--|---------------|-----------------|----------|------------------------------------|
| Description  | Unit Rate     | Number of units | (days)   | Cost                               |
| Backfill and compaction  | \$6.62 cy     | 36,575 CY       | 48       | \$242,126                          |
| Certified Clean Fill (delivered)                                   | \$14.39/ to n | 1,734 tons      |          | \$24,952                           |
| Compaction testing tech and equipment                              | 75.00/hr      |                 | 384 hrs  | \$28,800                           |
| Hydromulching  | \$1,874 /acre | 1 acre          |          | \$1,874                            |
| Total Cost for Site Restoration<br>Total Cost with H & S Markup of | 10%           |                 |          | \$295,87 <del>9</del><br>\$325,466 |

Estimated time required for Site Restoration:

48 days

20 days

#### 5.0 MEC/MD clearance of Remaining MRS

#### 5.1 Transect Layout

The purpose of a layout is to assure that the MRS has 100 % coverage during subsequent MEC removal activities. The work will consist of furnishing, placing, and maintaining the MEC clearance layout controls (stakes) necessary.

#### Assumptions:

1) a UXO Survey crew used to perform the construction layout survey will require a two person crew.

| Description           | Cost Code       | Unit Rate                               | Number of units | Cost     |
|-----------------------|-----------------|---|-----------------|----------|
| UXO Surveying Crew, 2 | 2 person survey | \$1,250 /day                            | 20 days         | \$25,000 |
| Total Cost for Survey | Crew            | • |                 | \$25,000 |

Estimated Number of days required =

#### 5.1 Vegetation Clearance

| Description   | Unit Rate       | Duration |      | Cost                  |
|---|-----------------|----------|------|-----------------------|
| UXO team clearance team                                 | \$7,400.00 /day | 5        | days | \$37,000              |
| Subcontractor - Clearing crew                           | 19,150          | 5        | days | \$95,750              |
| Equipment/supplies                                      | \$1,219/day     | 5        | days | \$6,069               |
| Misc Equipment/fuel                                     | \$719.18 /day   | 5        | days | \$3,596               |
| Additional H & S Markup of<br>Cost for MEC/MD screening | 10% Total       | L,       | I    | \$14,241<br>\$156,656 |

Estimated time required for Excavation = 5 days

#### 5.2 MEC Clearance

#### Assumptions:

Clearance of the remaining 20 acres of the Inactive Waste pit MRS will involve clearance to a depth of two feet below ground surface. It is assumed that the clearance process will use a mag and dig technique using Schonstedts, by a team of UXO Technicians (1 tech II, 3 Tech IIs and 3 Tech 1s), including one SUXO and one UXO QC/safety.

| Description | Unit Rate | Duration | ost |
|-------------|-----------|----------|-----|
|             |           |          |     |

| UXO team clearance team                                 | \$7,000.00 /day | 80 | days | \$560,000             |
|---|-----------------|----|------|-----------------------|
| Equipment/supplies                                      | \$1219.00 /day  | 80 | days | \$97,520              |
| Misc Equipment/fuel                                     | \$719.18 /day   | 80 | days | \$57,534              |
| Additional H & S Markup of<br>Cost for MEC/MD screening | 10% Total       |    |      | \$71,505<br>\$786,559 |

Estimated time required for Excavation =

80 days

#### 5.3 MEC Destruction

#### Assumptions:

Since a subsurface investigation has not been performed over the entire excavation area, the number of MEC items anticipated remains unknown. Assume 1 BIP per acre.

| Description                    | Unit Rate    | Number of units | Cost    |
|--------------------------------|--------------|-----------------|---------|
| Explosives                     | \$76.70 /BIP | 20 BIPS         | \$1,534 |
| Additional H & S Markup of     | 10%          |                 | \$153   |
| Total Cost for MEC Destruction |              |                 | \$1,687 |

#### 5.0 Mobilization / Demobilization

Mobilization and demobilization consists of providing and removing all required equipment and materials to and from the site. In addition, providing all required utilities is also included with mobilization.

Mobilization is calculated as 5% of the direct capital costs, including site preparations and remedial system installations.

| Mobilization/Demobilization | 10% of capital | \$157,448 |
|-----------------------------|----------------|-----------|
|                             |                |           |

#### 6.0 Construction and Technical Oversight

Field construction oversight will be required for the duration of the project. The duration of the project will include time to construct and remove support facilities (i.e. decon pad, erosion controls), excavation, MEC Clearance, and site restoration. An H&S Engineer is estimated to provide additional oversight at a rate of 1 day/wk. Due to the site location in an active range area, an additional 10% is applied to the work duration to account for anticipated work restrictions and delays. A similar cost is applied to UXO support for Characterization Sampling, Site Prep, and Excavation, however as base UXO support costs have already been applied in the preceding sections, only the additional 10% is applied here.

| Estimated total construction time<br>frame: | Site preparations:<br>Excavation/Restoration: | 9<br>151 | days<br>days |
|---|---|----------|--------------|
|   | Mob/Demob:                                    | 2        | days         |
|   | Duration (including 10% standby):             | 179      | days         |

| Description                               | Unit Rate     | Number of units |       | Cost      |
|---|---------------|-----------------|-------|-----------|
| Data Review                               | \$1,000       | lump sum        |       | \$1,000   |
| Site Visit and Meeting                    | \$5,000       | lump sum        |       | \$5,000   |
| Field Engineer                            | \$3,790/week  | 36              | weeks | \$136,440 |
| H&S Engineer                              | \$5,020 /week | 7.2             | weeks | \$36,144  |
|   |               |                 |       |           |
| Total Cont for Construction and Oversight |               |                 |       | \$178.584 |
| Total Cost for Construction and Oversight |               |                 |       | \$178,584 |

All work associated with Remedial Alternative GW-5 to be done using local workforce.

| SUMMARY OF CAPITAL COSTS:               |             |
|---|-------------|
| 1) Institutional Controls/Planning      | \$86000     |
| 2) Planning, Permitting and Reporting   | \$97,700    |
| 3) Site Preparation                     | \$22,875    |
| 4) Excavation of Source Material        | \$1,793,877 |
| 5) MEC Clearance of remaining MRS       | \$969,942   |
| 6) Mobilization/Demobilization          | \$165,425   |
| 7) Construction and Technical Oversight | \$157,448   |
| Contingency of Scope 10%                | \$329,326   |
| Contingency of Bid 5%                   | \$164,663   |
| TOTAL CAPITAL COST                      | \$3,787,256 |

#### **OPERATION AND MAINTENANCE (O&M) COSTS**

#### 7.0 Long-Term Groundwater and Surface Water Monitoring

The long-term groundwater monitoring would be designed to ensure that the plume characteristics are not changing in an unexpected manor, no new source areas are apparent, regulatory levels are being met, and the plume as a whole is acting as predicted.

The analytical program for the long-term groundwater monitoring program will consist of all of the contaminants of concern in addition to field parameters including dissolved oxygen, pH, Conductivity, Temperature, Turbidity, and ORP. These parameters ensure monitoring of the plume for regulatory compliance as wells as monitoring for changing geochemical and oxidation reduction state. All quality control sample analysis (field duplicates, rinse blanks, trip blanks) are assumed to be 20% of the total number of samples collection (20% of analytical costs).

For each sampling event, the following unit costs and level of efforts (LOEs) will apply:

Field Sampler: Number of People: Hours worked per day: Anticipated time to collect GW samples per location: Number of Wells to Sample for the long-term monitoring: Number of Surface Water Samples Collected Per Event: Anticipated time to collect SW samples per location: Data Management cost per sampling event:

\$58.00 /hr/person 2 people 10 hrs 3.0 hrs 12 wells 5 locations 1.5 hrs \$5,000.00 per event

| Description                                       | Unit Rate            | Number of units | Cost     |
|---|----------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                          |                      |                 |          |
| Labor for chemical sampling                       | \$58 /hr/person      | 44 hrs          | \$5,104  |
| Equipment (vehicle, pumps, water quality meter,   |                      |                 |          |
| etc.)   | \$1,752 /event       | 1 event         | \$1,752  |
| Chemical Analysis Cost                            |                      |                 |          |
| VOCs (Including TCE, DCE, VC)                     | \$135                | 21 samples      | \$2,835  |
| TOTAL CHEMICAL ANALYSIS COST:                     |                      |                 | \$2,835  |
| Data Management and Reporting cost                | \$5,000.00 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per Sampling E | vent                 |                 | \$14,691 |

It is assumed that following the first 5 years of the LTM program that the total number of wells to be sampled would be reduced from 12 to 8.

| Description                                     | Unit Rate         | Number of units | Cost     |
|---|-------------------|-----------------|----------|
| COSTS PER SAMPLING EVENT                        |                   |                 |          |
| Labor for chemical sampling                     | \$58 /hr/person   | 32 hrs          | \$3,712  |
| Equipment (vehicle, pumps, water quality meter, | \$1,752 /event    | 1 event         | \$1,752  |
| Chemical Analysis Cost                          |                   |                 |          |
| VOCs (Including TCE, DCE, VC)                   | \$135.00          | 16 samples      | \$2,160  |
| TOTAL CHEMICAL ANALYSIS COST:                   |                   |                 | \$2,160  |
| Data Management and Reporting cost              | \$5,000 per event | 1 event         | \$5,000  |
| Total Sampling and Reporting Costs per Sampling | g Event           |                 | \$12,084 |

#### DESCRIPTION OF COSTS PER PHASE ADJUSTED TO PRESENT VALUE

| Using a discount rate of          | 3.5%              | for a period of | 5 years         | \$45,938 |
|-----------------------------------|-------------------|-----------------|-----------------|----------|
| years)                            |                   | \$12,084 /event | 1 events        | \$12,084 |
| Annual Cost for Years 6-10 (annua | al sampling for 5 |                 |                 |          |
| Description                       |                   | Unit Rate       | Number of units | Cost     |
| Using a discount rate of          | 3.5%              | for a period of | 5 years         | \$82,318 |
| Annual Cost for Semiannual Samp   | ling Years 1-5    | \$14,691 /event | 2 events        | \$29,382 |
| Description                       |                   | Unit Rate       | Number of units | Cost     |

Total Discounted Sampling Cost:

Years 1-5

\$82,318

| Years 6-10 | \$45,938  |
|------------|-----------|
| Total      | \$128,255 |

#### 8.0 Well Construction, Abandonment, and Maintenance

Since LTM will occur over an anticipated period of 10 years, the groundwater monitoring wells will require maintenance to allow for accurate sampling of the aquifer. This will include inspections yearly with maintenance as needed.

| Description   | Unit Rate     | Number of units | Discounted Cost |
|---|---------------|-----------------|-----------------|
| Well inspection and maintenance   | \$2,158 /year | 10 years        | \$11,901        |
| Future Well abandonment   | \$2,425 /well | 23 wells        | \$39,539        |
| Nell replacement will be performed periodi  |               |                 |                 |
| Well replacement will be performed periodi<br>every 5 years for the entire duration of the<br>complete. |               |                 |                 |
| every 5 years for the entire duration of the  |               |                 |                 |

Discount Rate = 3.5%

#### 9.0 Land Use Control Inspections/Sign Repairs/ Construction Support

Construction Support will be required during all intrusive operations (sign replacement, utility repairs, etc). Assumes 40 hours/year of Construction support.

| Description                                 | Unit Rate            | Number of units | Cost    |
|---|----------------------|-----------------|---------|
| UXO Construction Support – (Tech III)       | \$4,750/year         | lump sum        | \$4,750 |
| Land Use Control Inspection/Sign<br>Repairs | \$5,575/year         | lump sum        | \$5.575 |
| Using a discount rate of 3.5%               | for a period of 10 v | ears \$7,317.31 |         |

#### 10.0 5-Year Review

Five-year reviews will be performed to assess the effectiveness of the remedy. For the purpose of this FS, the duration for these activities is assumed to be 10 years.

| Description   | Unit Rate | Number of   | C        |
|---|-----------|-------------|----------|
| 5-Year Review (including draft, draft final, and final reports) | \$15,000  | lump<br>sum | \$15,000 |
| Using a discount rate of 3.5% for a period of                   |           |             |          |

Discounted O&M Cost:

| 10-Year Sampling Cost                                   | \$128,255 |
|---|-----------|
| Well Construction, Abandonment, and Maintenance         | \$79,460  |
| Land Use Control Inspections/Sign Repairs/ Construction | \$7,317   |
| 5-Year Reviews  | \$73,772  |
| Total   | \$288,804 |
| Discounted O&M  | \$288,804 |

| TOTAL CAPITAL COST:        |     | \$3,787,256 |
|----------------------------|-----|-------------|
| DISCOUNTED O&M COST:       |     | \$288,804   |
| Contingency of Scope:      | 5 % | \$14,440    |
| Contingency of Bid:        | 10% | \$28,880    |
| TOTAL DISCOUNTED O&M COST: |     | \$332,124   |
| TOTAL PRESENT WORTH VALUE: |     | \$4,119,380 |

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# Appendix E Public Comment Letters Received

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From: Mark Hiler [mailto:dbear12@optonline.net]
Sent: Friday, September 28, 2018 4:04 PM
To: Gabel, Ted B CIV USARMY ID-SUSTAINMENT (US) <<u>ted.b.gabel.civ@mail.mil</u>>
Subject: [Non-DoD Source] Comments on the 600 Hill Waste Pit Proposed Plan

#### Dear Mr. Gabel

As a resident of Rockaway Township, and a member of the Township's Environmental Commission, I attended the presentation of the proposed plan for 600 Hill Waste Pit. It was a clear and concise overview of the environmental issues, and a complete evaluation of the Alternatives. I am in total agreement with the Army's recommended Alternative #6. I am always in favor of removal actions when they are possible. It seems lately there have been more Monitored Natural Attenuation and Land Use Controls solutions used than removal actions. I understand it not always economically possible depending on the risk factors, but I favor "when in doubt dig it out".

I understand the complexity of the environmental clean-up, but it seems the process has slowed down in the last several years. I would like to encourage all stakeholders, Army, Contractors, Regulators, and the Public to think of ways to expedite the process of cleanup.

Respectfully Mark Hiler 64 Lyonsville Road Rockaway Twp. (Boonton 07005 mailing address) This page intentionally left blank.