

FINAL

**Decision Document Amendment
for
CC Site 03
36 Acre Uncontaminated Parcel**

**Sievers Sandberg
United States Army Reserve Center
Oldmans Township
Salem County, NJ**

March 2016

TABLE OF CONTENTS

1.0 INTRODUCTION TO THE SITE AND STATEMENT OF PURPOSE.....	1
2.0 SUMMARY OF SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY	2
2.1 SITE HISTORY.....	2
2.2 CONTAMINATION.....	2
2.3 SELECTED REMEDY IN THE 2012 DD	3
3.0 BASIS FOR THE DD AMENDMENT.....	4
3.1 CONTAMINATION AND RISK AT SIEVERS SANDBERG	4
3.2 RE-EVALUATION OF RISK AT CC SITE 03 (OU1).....	5
3.3 RISK ASSESSMENT FOR NEW SITE CC SITE 04 (OU2).....	7
4.0 DESCRIPTION OF NEW ALTERNATIVE.....	8
4.1 BACKGROUND.....	8
4.2 COMPARISON OF ORIGINAL AND NEW REMEDY	8
5.0 EVALUATION OF NEW REMEDY	10
5.1 ANALYSIS OF ORIGINAL AND NEW ALTERNATIVES	11
6.0 LEAD AND SUPPORT AGENCY COMMENTS	13
7.0 AFFIRMATION OF THE STATUTORY DETERMINATIONS.....	14
7.1 AUTHORIZING SIGNATURE.....	14
8.0 PUBLIC PARTICIPATION COMPLIANCE/ACTIVITIES	15
8.1 RESPONSIVENESS SUMMARY	15
9.0 REFERENCES	21

APPENDIX A CERTIFICATIONS OF PUBLICATION

LIST OF FIGURES

Figure

1. Site Location Map of Sievers Sandberg USARC, NJ
2. Sievers Sandberg USARC
3. Historical Soil Analytical Results, Camp Pedricktown, NJ
4. Soil Analytical Results Map, Sievers Sandberg USARC
5. Site Names and Operable Units

LIST OF TABLES

Table

- 1 Non-Carcinogenic Risk Assessment Results for CC Site 03
- 2 Carcinogenic Risk Assessment Results for CC Site 03
- 3 Non-Carcinogenic Risk Assessment Results for CC Site 04
- 4 Carcinogenic Risk Assessment Results for CC Site 04
- 5 Comparison of Original and New Remedy for CC Site 03
- 6 Analysis of Alternatives as Applied to the Evaluation Criteria

LIST OF ACRONYMS AND ABBREVIATIONS

AOPEC	Area of Potential Environmental Concern
ARAR	Applicable or Relevant and Appropriate Requirements
Army	United States Army
BRAC	Base Realignment and Closure
CC	Cleanup Compliance
CEA	Classified Exemption Area
CERLCA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulation
COC	Contaminant of Concern
DD	Decision Document
DERP	Defense Environmental Restoration Program
DOE	Department of Education
DSMOA	Defense State Memorandum of Agreement
FUDS	Formerly Used Defense Sites
GSA	General Services Administration
HI	Hazard Index
HHRA	Human Health Risk Assessment
LUC	Land Use Control
MEC	Munitions and Explosives of Concern
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
NJ	New Jersey
NJDEP	New Jersey Department of Environmental Protection
OU	Operable Unit
PCE	Tetrachloroethene
PPB	Parts per Billion
RA	Remedial Action
RAO	Remedial Action Objective
ROD	Record of Decision
RSC	Regional Support Command
SRS	Soil Remediation Standards
U.S.	United States
USACHPPM	United States Army Center for Health Protection and Preventative Medicine
USARC	United States Army Reserve Command
USEPA	United State Environmental Protection Agency
UU/UE	Unlimited Use/ Unrestricted Exposure
UXO	Unexploded Ordinance

1.0 INTRODUCTION TO THE SITE AND STATEMENT OF PURPOSE

The Sievers Sandberg United States Army Reserve Center (USARC), also known as the Camp Pedricktown Reserve Enclave, is part of the 99th United States Army Reserve Command. It is located on U.S. Route 130 in Oldmans Township, Salem County, New Jersey (**Figure 1**). The United States Army, as the lead agency, is conducting a response action at the Sievers Sandberg USARC in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Act (NCP) through the Defense Restoration Program (DERP) and Executive Order 12580. The New Jersey Department of Environmental Protection (NJDEP) is the supporting regulatory agency.

This Decision Document (DD) Amendment is submitted to provide notification of a proposed change in the original remedy described in the DD signed September 2012 for CC Site 03 (36 Acre Uncontaminated Parcel) at Sievers Sandberg USARC. The Army considers the proposed change to be fundamentally different from the selected remedy in the September 2012 DD. This DD Amendment is prepared in accordance with 40 CFR Sec 300.435(c)(2)(i) and explains the fundamental difference between the remedy being undertaken and the selected remedy set forth in the original DD and the reasons such changes are being made.

This DD Amendment will become part of the administrative record file for CC Site 03, 40 CFR 300.800. This DD Amendment and all documents supporting the decisions of the selected remedy are contained in the Administrative Record, which is available at the following location:

99th Regional Support Command
Public Affairs Office
5231 South Scott Plaza
Joint Base MDL, NJ 08641

The modified remedy detailed herein is intended to meet the agreed Remedial Action Objectives (RAOs) established for CC Site 03. The proposed changes fundamentally alter the original DD and the proposed remedy continues to be protective and continues to meet Applicable or Relevant and Appropriate Requirements (ARARs) (40 CFR 300.430(f)(1)(ii)(B)(1) and (2)).

2.0 SUMMARY OF SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

2.1 SITE HISTORY

The 1995 Base Realignment and Closure (BRAC) Commission recommended Camp Pedricktown for closure. The United States Department of the Army retained a portion of Camp Pedricktown (known as both the Camp Pedricktown Enclave and the Sievers Sandberg USARC) to support the missions of the United States Army Reserve. The Sievers Sandberg USARC is an approximate 40 acre parcel located in the northwest section of Oldmans Township, Salem County, New Jersey (NJ) (**Figure 2**).

Site CC Site 03 was originally comprised of all 40 acres at the Sievers Sandberg USARC. The site included all four main areas of the facility, the Administration Area, the Housing and Recreation Area, the Military Vehicle Parking Area, and the Warehousing Area. The Warehousing Area includes Buildings 434 and 464 and the surrounding area. From World War 1 (1914-1918) to 1958, the site was part of the Delaware Ordnance Depot and used to store munitions. From 1960-1966, the site, then called Camp Pedricktown, was part of the Headquarters of the 42nd and 43rd Artillery and activities at the site controlled all the NIKE missile sites in the Philadelphia area. In the late 1960s, the Army Reserve Command took control and performed unit training activities. Under the 1995 BRAC legislation, Camp Pedricktown, except for the Sievers-Sandberg USARC, was recommended for closure and eventually 46 acres were conveyed to other entities under the BRAC process. The Army Reserve Command is now in the process of excessing the land at Sievers Sandberg and transferring it to non-Army owners.

2.2 CONTAMINATION

Eighteen environmental investigations were performed at CC Site 03 between 1991 and 2010 at 50 areas of concern, 27 of which were at underground storage tanks. Groundwater and soil sampling and testing were the primary activities conducted as there are no surface water bodies or streams on the property. The contaminants of concern (COCs) detected within site CC Site 03 were identified as the following:

- Soils: Arsenic, Cadmium, Chromium, Copper, lead, Molybdenum, and Zinc
- Groundwater: Boron, lead, 1,1,2-Trichloroethane, Tetrachloroethene, and Heptachlor Epoxide

The risk assessment results for CC Site 03 showed there were no unacceptable risks for Industrial Workers, Construction Workers or Adult Residents, but there was an unacceptable risk to the Child Resident (USACHPPM, 2008). The Risk Assessment also showed that arsenic in soil was the only constituent at the site driving an unacceptable risk. No constituents in groundwater produced unacceptable risks for any pathway.

2.3 SELECTED REMEDY IN THE 2012 DD

The selected remedy for CC Site 03 outlined within the DD and its associated Land Use Control (LUC) Implementation Plan includes the following components:

- No Action for Groundwater
- Implementation of Land Use Controls for soils
 - Prohibit or manage all construction and excavation activities that result in the disturbance of surface soils and subsurface soils
 - Restrict land use so that no residential development or any other uses that would result in child occupancy may occur

The LUC objectives established for site CC Site 03 include preventing dermal contact with, incidental injection of, and inhalation of dust from surface soils above risk-based concentrations of arsenic to remain protective of a residential child or recreational property user and to prevent dermal contact with, and incidental ingestion of, subsurface soils above risk-based concentrations of arsenic to remain protective of a residential child or recreational property user.

3.0 BASIS FOR THE DD AMENDMENT

The 2012 DD selected the preferred remedy of LUCs for the entire 40 acre parcel of CC Site 03 in response to the risk associated with a future hypothetical child resident. However, the LUCs chosen to keep the site protective overstepped their goal by (1) applying the LUCs to the entire 40 acre property when the contamination driving the risk was present within an area only one tenth that size; and (2) applying stricter controls than needed in order to prevent residential use of the site. These unnecessarily restrictive LUCs are also interfering with the sale and transfer of the Sievers Sandberg property to non-Army use.

Upon a closer examination of the site contamination data and risk assessment, the Army is proposing in this DD Amendment to separate original site CC Site 03 into two sites and two response areas or operable units (OUs) to better address site risks.

3.1 CONTAMINATION AND RISK AT SIEVERS SANDBERG

Arsenic in soil was the only contaminant of concern and media that produced exceedances of the U.S. Environmental Protection Agency's (USEPA) acceptable non-carcinogenic hazard level of 1.0 (hazard level of 3.43) and exceedances of the acceptable carcinogenic risk range of $1E-04$ – $1E-06$ (risk assessment result of $1.3E-04$). In both instances it was the future child resident pathway that produced the exceedances. The risk assessment pulled data from 3 sources, the Site Investigation Report (Kemron, 2005), the Final Sampling Summary Report (CATI, 2006) and the Continued Site Investigation Addendum Report (USACHPPM, 2006). A review of these reports found that all exceedances of arsenic above the NJ criteria were located around Buildings 434 and 464 in the Warehousing Area. Thus, the only area with contamination above the level allowing unrestricted site use is in and around Buildings 434 and 464.

In 2013-2014, the Army conducted an additional investigation to delineate the horizontal and vertical extent of arsenic contamination in the Building 434 and 464 area, focusing on the gravel access road located immediately north of the buildings. Twenty-five 4 foot borings were drilled and soil samples were collected every 0.5 foot increment. At most locations, the contamination was vertically delineated. Above background levels of arsenic appear to extend slightly beyond the current sampling area, to the southeast of Building 434, but concentrations are decreasing in that direction. Additionally, Building 404 is approximately 160 feet southeast of Building 434 and blocks the continuation of the old gravel access road presumed to be the source of the arsenic. **Figures 3 and 4** show the sampling results included in the Focused Investigation Report, PARS 2014 report.

The Army decided to separate the original 40 acre site, CC Site 03, into two sites and two OUs. One site contains the arsenic contaminated soils and the other site does not contain any arsenic contamination. This configuration will facilitate the selling and transferring of uncontaminated property while allowing more time to address the contamination in the warehouse area. The area with the high concentration of arsenic in soil, the area around Buildings 434 and 464, will

become a separate, 4 acre site identified as new site CC Site 04, Arsenic in Soil, and be located within OU2. The Arsenic in Soil site will continue to be subject to the existing LUCs pending further investigation by the Army. **Figure 5** shows the boundaries of new CC Site 04 and existing site CC Site 03. The CC Site 04 site boundary runs along the installation's western and northern boundary adjacent to the former BRAC parcel, cuts southeast down to Central Road, follows Central Road in a southwestern direction to Depot Avenue and then follows Depot Avenue in a northwestern direction up to the installation boundary. This footprint is probably larger than needed, but was designed to accommodate an uncertain arsenic contaminated area. This site configuration allows ample room between the known contamination area and the southeastern extent of the site, which runs to the southeast side of Building 404 to Central Avenue.

Site CC Site 03 now represents the remaining 36 acres that were not impacted or contaminated by arsenic and has no unacceptable levels of contaminants, as determined by the past investigations and the risk assessment. CC Site 03, named 36 Acre Uncontaminated Parcel, is located in OU1 and its footprint is shown in Figure 4. A new remedy is recommended for CC Site 03 and is described in this DD Amendment.

3.2 RE-EVALUATION OF RISK AT CC SITE 03 (OU1)

Since arsenic was found only in the limited area around Buildings 434 and 464 (a 4 acre area), re-running the Human Health Risk Assessment (HHRA) without the arsenic data results in a risk assessment evaluation of the larger, 36 acre area of site CC Site 03. With arsenic removed, the non-carcinogenic hazard index (HI) for the resident child, the only pathway that previously had unacceptable results, is now 0.05, well below the acceptable level of one. With arsenic removed, the carcinogenic risk to the resident child in the revised CC Site 03 is 6.95E-09, well under the acceptable risk range of 1E-04 to 1E-06. Thus, the overall risk assessment result for site CC Site 03 results in no unacceptable exceedances of the USEPA risk range, qualifying the 36 acre site for unrestricted site use and a remedy of No Action.

The revised footprint of site CC Site 03 (36 acres) was not impacted or contaminated by arsenic (or any other contaminants), as determined by past environmental studies and the risk assessment. These 36 acres qualify for unlimited use and unrestricted exposure (UU/UE). A new remedy of No Action is being proposed for CC Site 03. The revised HHRA results for CC Site 03 are in **Tables 1 and 2**.

**Table 1: Non-Carcinogenic Risk Assessment Results for CC Site 03
36 Acre Uncontaminated Parcel**

Pathway	Industrial Worker	Construction Worker	Adult Resident	Child Resident
Soil				
Ingestion	6.01E-04	1.25E-02	5.28E-03	4.92E-02
Dermal	4.13E-05	3.73E-05	2.11E-05	1.38E-04
Inhalation	1.74E-04	2.15E-06	2.43E-04	2.43E-04
TOTAL SITE RISK	3.16E-04	1.25E-02	5.54E-03	4.96E-02
Groundwater				
Ingestion	3.04E-02	Not Applicable	4.28E-02	9.75E-02
Dermal	4.74E-06	Not Applicable	7.74E-05	2.29E-04
TOTAL SITE RISK	3.04E-02	Not Applicable	4.28E-02	9.78E-02

**Table 2: Carcinogenic Risk Assessment Results for CC Site 03
36 Acre Uncontaminated Parcel**

Pathway	Industrial Worker	Construction Worker	Adult Resident	Child Resident
Soil				
Ingestion	Not Applicable*	Not Applicable*	Not Applicable*	Not Applicable*
Dermal	Not Applicable*	Not Applicable*	Not Applicable*	Not Applicable*
Inhalation	2.12E-08	2.62E-09	3.57E-08	6.96E-09
TOTAL SITE RISK	2.12E-08	2.62E-09	3.57E-08	6.96E-09
Groundwater				
Ingestion	2.51E-06	Not Applicable	4.22E-06	2.01E-06
Dermal	1.06E-09	Not Applicable	6.22E-08	1.58E-08
TOTAL SITE RISK	2.51E-06	Not Applicable	4.28E-06	2.03E-06

Notes: *With the removal of Arsenic from the original risk assessment, no other carcinogenic COCs for the ingestion or dermal pathways remained, resulting in no calculated risk number for those pathways.

3.3 Risk Assessment for New Site CC SITE 04 (OU2)

All arsenic contaminated soils at Sievers-Sandberg are located in the vicinity of Buildings 434 and 464 in the Warehousing Area. This contaminated area encompasses an area approximately 4 acres in size and has been designated as new site CC Site 04 and OU2, which is shown in Figure 2. This site is named Arsenic in Soil. The risk assessment results from the original risk assessment (USACHPPM, 2008) are still applicable to this site and are in **Tables 3 and 4**. The only pathway with unacceptable risk results is the future child resident with a hazard index of 3.4 and a carcinogenic risk of 1.31E-04. The Army plans to continue to apply the existing LUCs to new site CC Site 04 while further evaluation of the soil contamination and site remediation alternatives are re-evaluated.

Table 3: Non-Carcinogenic Risk Assessment Results for CC Site 04

Pathway	Industrial Worker	Construction Worker	Adult Resident	Child Resident
Soil				
Ingestion	2.43E-01	7.09E-02	3.39E-01	3.17E+00
Dermal	4.72E-02	2.40E-03	4.00E-02	2.62E-01
Inhalation	1.74E-04	2.18E-06	2.43E-04	2.43E-04
TOTAL SITE RISK	2.09E-01	8.71E-01	3.79E-01	3.43+00
Groundwater				
Ingestion	3.05E-02	Not Applicable	4.27E-02	9.76E-02
Dermal	1.47E-05	Not Applicable	4.22E-06	7.33E-04
TOTAL SITE RISK	3.05E-02	Not Applicable	4.30E-02	9.83E-02

Table 4: Carcinogenic Risk Assessment Results for CC Site 04

Pathway	Industrial Worker	Construction Worker	Adult Resident	Child Resident
Soil				
Ingestion	3.84E-05	5.07E-06	6.45E-05	1.20E-04
Dermal	7.60E-06	4.56E-07	7.72E-06	1.01E-05
Inhalation	7.77E-08	9.60E-09	1.31E-07	2.61E-08
TOTAL SITE RISK	4.61E05	5.53E-06	7.23E-05	1.31E-04
Groundwater				
Ingestion	2.51E-06	Not Applicable	3.26E-04	1.97E-06
Dermal	1.39E-09	Not Applicable	9.16E-08	1.77E-08
TOTAL SITE RISK	2.51E-06	Not Applicable	4.31E-06	1.99E-06

4.0 DESCRIPTION OF NEW ALTERNATIVE

4.1 BACKGROUND

The Army signed the original CC Site 03 DD in September 2012 and selected LUCs as the preferred remedy. This DD Amendment proposes a new remedy for the site. A re-evaluation of the soil and groundwater contamination data and risk assessment results support the separation of CC Site 03 into two separate OUs; one that poses no risk to human health and the environment (designated OU1, the revised footprint of CC Site 03) and one that retains LUCs as the selected remedial action until the Army can conduct further investigations to properly evaluate the site (new site CC Site 04).

4.2 COMPARISON OF ORIGINAL AND NEW REMEDY

A side-by-side comparison of the remedial action objectives (RAOs) and the remedy components of the original remedy included in the DD and the proposed new remedy included in this DD Amendment are shown in **Table 5**.

Table 5. Comparison of Original and New Remedy for CC Site 03

	Original Remedy - LUCs	New Remedy – No Action
RAOs	Prevent dermal contact with, incidental ingestion of, and inhalation of dust from surface soils above risk-based concentrations of arsenic to remain protective of a residential child or recreational property user and to prevent dermal contact with, and incidental ingestion of, subsurface soils above risk-based concentrations of arsenic to remain protective of a residential child or recreational property user.	No risk. No RAOs needed.
Remedy Components	Prohibit or manage all construction and excavation activities that result in the disturbance of surface soils and subsurface soils. Restrict land use so that no residential development or any other uses that would result in child occupancy may occur.	No Action. No remedy components.

4.3 DESCRIPTION OF CHANGES

The 2012 DD selected the remedy of LUCs for the entire 40 acre parcel of CC Site 03 in response to the risk associated with a future hypothetical child resident. Upon a closer examination of the HHRA and site evaluation data, the Army is proposing in this amendment to separate CC Site 03 into two sites and 2 OUs.

The area with the arsenic contamination in the soil will continue to be subject to LUCs pending further investigation by the Army (i.e., the area around Buildings 434 and 464). This 4 acre parcel is now identified as new site CC Site 04 which is located within OU2. The remaining 36 acres (revised footprint site CC Site 03 located within OU1) was not impacted or contaminated by arsenic and has no unacceptable levels of contaminants, as determined by the past investigations and the risk assessment. Therefore, no response action is required. These 36 acres qualify for UU/UE.

5.0 EVALUATION OF NEW REMEDY

The NCP, at 40 CFR, 300.430(e), lists nine criteria against which each Remedial Action (RA) must be assessed. The first two criteria are threshold criteria that must be met by each alternative. The next five criteria are the primary balancing criteria upon which the analysis is based. The final two criteria are referred to as modifying criteria and are applied after the subsequent public comment period to evaluate state and community acceptance. The acceptability or performance of each RA against the criteria is evaluated individually so that relative strengths and weaknesses may be identified.

The two threshold criteria are:

- Protection of human health and the environment
- Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)

The five primary balancing criteria upon which the analysis is based on are:

- Long-term effectiveness and permanence
- Reduction of toxicity, mobility, or volume throughout treatment
- Short-term effectiveness
- Implementability
- Cost

The two modifying criteria are evaluated following comments on the Proposed Plan and will be described further in the document.

- State acceptance
- Community acceptance

Overall protection of Human Health and the Environment. This criterion addresses the extent and manner in which the RA achieves the protection of human health and the environment over time. Protection of human health and the environment is met if each human health and ecological exposure pathway identified in the risk assessment as potentially resulting in adverse effects is eliminated, reduced to an acceptable level, or controlled through treatment or engineering and land use controls. Site use restrictions after remediation are also considered under this criterion.

Compliance with ARARs. This criterion addresses whether the RA complies with ARARs or information to-be-considered.

Long-term Effectiveness and Permanence.

The long-term reliability criterion addresses the degree, extent, and manner in which the RA continues to protect human health and the environment in terms of residual risk remaining at the site after the remedial action has been implemented. This criterion considers the residuals

following completion of the actions, expected duration of the response action, and the degree and reliability of controls required to ensure protectiveness of the response action.

Reduction of Toxicity, Mobility, or Volume of Wastes. This criterion relates to the extent to which RAs permanently reduce the toxicity, mobility, and volume of contaminants present at the site. Factors for this criterion include the degree of permanence of the remedial action, the amount of hazardous materials destroyed, and the type and quantity of residuals remaining after treatment.

Short-term Effectiveness. Short-term effectiveness addresses the effects of the RA during construction and implementation until the corrective action objectives are met. This criterion considers the protection of the community and workers, including the air-quality effects and hazards from excavation, transportation, and on-site treatment. In addition, the expected length of time for completion of the remedial action is considered.

Implementability. The technical and administrative feasibility of implementing each RA and the availability of services and materials are addressed by this criterion. This criterion also considers the degree of coordination required by the regulatory agencies, successful implementation of the remedial action at similar sites, and research to realistically predict field implementability.

Cost. This criterion addresses the capital costs, the operation and maintenance costs, and the present worth analysis of costs anticipated for the implementation of the response action. Capital costs are divided into direct costs (construction) and indirect costs (non-construction and overhead). Direct capital costs include construction, equipment, land and site development, relocation, and disposal costs. Indirect capital costs include engineering expenses, legal fees, license or permit costs, start-up costs, and contingency allowances. Operation and maintenance costs consist of costs associated with post construction activities necessary to properly operate, maintain, and monitor a given response action.

5.1 ANALYSIS OF ORIGINAL AND NEW ALTERNATIVES

This section provides detailed analysis of the original remedy and the new proposed remedy as applied to the evaluation criteria. The evaluation of the two alternatives is in **Table 6**.

Table 6. Analysis of Alternatives as Applied to the Evaluation Criteria

Criteria	Original Remedy - LUCs	New Remedy – No Action
Overall Protection of Human Health and the Environment	Effective for human health by ensuring LUCs are implemented and maintained. No unacceptable ecological risk identified.	Because there are no unacceptable risks or hazards at the site to human health or the environment, the No Action alternative is protective for all current and future site uses.
Compliance with ARARs	Addresses RAOs for potential exposure to contaminants of concern (COCs) above site cleanup levels.	There are no unacceptable risks/hazards at the site; therefore ARARs are not triggered and do not apply to this alternative.
Long-Term Effectiveness and Permanence	The alternative is effective and permanent if LUCs are implemented and maintained properly.	The alternative is effective and permanent as there are no unacceptable risks or hazards.
Reduction of Toxicity, Mobility, and Volume of Waste	There is no reduction of toxicity, mobility or volume of waste.	As there are no COCs at this site, this alternative does not employ any treatment that would reduce the toxicity, mobility or volume of COCs.
Short-Term Effectiveness	Implementation of the remedy does not pose any additional risks to the community, the workers or the environment.	Implementation of the remedy does not pose any additional risks to the community, the workers or the environment since there is no action.
Implementability	Readily implemented.	The no action alternative does not include any actions to implement.
Cost	Undetermined as no cost data were included in the original DD.	\$0
State Acceptance	Unknown as no records of state review or comment of original DD was found.	Comments received from NJDEP questioned the appropriateness of the proposed remedy. NJDEP does not agree with the No Action remedy.
Community Acceptance	Unknown as no records regarding community participation in remedy selection was found.	A Public Meeting was held on 3 March 2015. No comments against the new remedy were voiced by the public comment.

6.0 LEAD AND SUPPORT AGENCY COMMENTS

The Army has worked with the NJDEP in developing the changes described in this Amendment document and comments received on the draft DD Amendment have been incorporated into this document.

NJDEP does not concur with this DD Amendment due to the fact that the Army conducted the project under the Federal CERCLA law rather than New Jersey State regulations and guidance.

The Army disagrees with NJDEP's position as the Army is required to conduct cleanup under the federal CERCLA requirements and follows promulgated USEPA guidance documents and standards for these types of projects. . After the investigation, if a site's risk assessment shows an unacceptable risk to the current and/or reasonably anticipated future land uses, state laws are included in addition to the CERCLA process in accordance with CERCLA §121(d) if more stringent and legally applicable or relevant and appropriate to the circumstances at a given site.

7.0 AFFIRMATION OF THE STATUTORY DETERMINATIONS

The new remedy proposed in this DD Amendment satisfies the relevant portions of CERCLA Section 121. The selected remedy remains protective and continues to meet ARARs (NCP Section 300.430(f)(1)(ii)(B)(1) and (2)). Following the re-evaluation of risk assessment, the Army, and NJDEP have determined that the remedy selected for site CC Site 03 (OU1) complies with Federal and State requirements that are applicable or relevant and appropriate to this remedial action, and is cost effective.

7.1 AUTHORIZING SIGNATURE



MARGARET W. BOOR
MAJOR GENERAL, USAF
COMMANDING
99TH REGIONAL SUPPORT COMMAND



Date

8.0 PUBLIC PARTICIPATION COMPLIANCE/ACTIVITIES

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 maintained an administrative record, which is available for the public, in accordance with 40 CFR 300.800. A final Proposed Plan for the remedy change was completed and released to the public on December 26, 2014 at the administrative record.

Newspaper notifications were made to inform the public of the start of the PP comment period, solicit comments from the public and announce the public meeting. The first notification ran in the South Jersey Times on December 26, 2014 and the second ran on February 19, 2015. A second notification was required as the first public meeting was postponed due to a snowstorm. Copies of the certificates of publication are provided in Appendix A. A public meeting was held on March 3, 2015 at Salem Community College to inform the public about the proposed new remedy for CC Site 03 and to seek public comments. At this meeting, representatives from the U.S. Army Reserve Command were present to answer questions about the site and the new remedy under consideration. The public comment period ran from December 26, 2014 to April 4, 2015 (extended due to snow storms) during which comments from the public were received and one written comment letter from NJDEP was received.

Comments received from the NJDEP were evaluated and considered in selecting the new remedy. The NJDEP submitted a letter expressing their concerns regarding the change in remedy. The NJDEP letter and responses to the letter are detailed in Section 8.1.

The Army has considered all comments and concerns summarized below in selecting the final remedy for the site.

8.1 RESPONSIVENESS SUMMARY

The final component of the DD Amendment is the Responsiveness Summary. The Responsiveness Summary's purpose is to provide a summary of the stakeholder' comments, concerns, and questions about the selected remedy for site CC Site 03. The comments received during the Public Comment Period, as well as the Army's response, is shown below.

Comments received from the NJDEP were evaluated and considered in selecting the final RA. The NJDEP submitted a letter expressing their concerns regarding the selected RA in this DD Amendment. In particular, the letter notes the following concerns: (a) Has arsenic in soil at the building 464 area been fully delineated; (b) The need for a groundwater Classification Exception Area (CEA); (c) The Army should use the NJ soil remediation standards (SRS) to determine if a remedial action is required at the site; and (d) Requesting whether any investigations on unexploded ordnance (UXO) and/or munitions and explosives of concern (MEC) have been conducted.

COMMENT NUMBER 1: LETTER RECEIVED FROM NJDEP (Letter to Ms Susan Shelton dated January 29, 2015).

Re: Camp Pedricktown
Oldmans Township, Salem County, New Jersey
SRP PI # 007199

Dear Ms Shelton:

The New Jersey Department of Environmental Protection (NJDEP or Department) has completed a review of the document titled "Proposed Plan Amendment Historical Site Investigation Document Submission and Decision Document" dated September 11, 2014, submitted pursuant to Department of Defense State Memorandum of Agreement (DSMOA) executed on April 3, 1992 and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E.

The NJDEP's comments on the submittal are provided below.

NJDEP Point #1: The Department is concerned with elevated arsenic in soils detected on the Enclave property along the northeast edge of building 464. It has been suggested that the elevated arsenic is tied to buried slag used as a sub-base for the path that runs along the northeast side of this building. When the location of elevated arsenic depicted on the Enclave property (AOPEC #10) is compared to the location of soils that were removed from the adjacent Camp Pedricktown BRAC site it is noted that the two areas are immediately adjacent to each other along the northeast side of building 464. While the impacted soil was removed from Camp Pedricktown BRAC portion of the site it is proposed to be left in place on the Enclave portion of the site.

Army Response to Point #1: *It is not the intent of the Army to use this DD Amendment to leave the soils in place adjacent to the BRAC portion of the site. Rather, the Army is separating the clean acres (36) that pose no risk to any receptor from the 4 acres that have high arsenic soil levels. The 4 acres with high arsenic levels will be evaluated via the CERCLA process, starting with a remedial investigation/feasibility study (RI/FS) in 2016.*

NJDEP Point #2: The Department has not seen any maps that clearly show the boundaries/limits of the arsenic contaminated soil, or the boundaries/limits of the coal slag that is believed to be the source of the arsenic contamination. A map showing the limits of the arsenic contaminated slag is necessary in order for the Department to concur with the proposed property modification.

Army Response to Point #2: *In 2014, the Army conducted an additional soil investigation in the Building 434 and 464 area to delineate the arsenic contamination.*

Figures 2 and 3 in Section 3.2 of this DD Addendum depicts the approximate extent of this contamination. Although contaminant levels were shown to be dropping to the southeast of Building 434, the extent of contamination was not fully defined in this direction. To accommodate this data gap, the southwestern edge of the arsenic contaminated area was drawn well beyond the sampled area, all the way to Central Road, which is southeast of Building 404. Building 404 is approximately 160 feet southeast of Building 434 and blocks the continuation of the old gravel access road which is thought to be the source of the arsenic contamination. This area has been separated from the rest of the site and is now designated as new site "CC Site 04". This new site will have an RI/FS initiated in 2016. The future remedy at CC Site 04 will depend on the results of the RI/FS.

NJDEP Point #3: As stated previously, significant arsenic soil contamination (up to 224 ppm) was detected in shallow soil that appears to be related to coal slag used as base material for the access road that runs parallel to buildings 464 and 434. The elevated arsenic concentrations appear to be focused in the 1 to 3 foot depth range. The Army has proposed to leave the contaminated soil onsite. Please be advised that for any contaminated soil remaining pursuant to N.J.A.C. 7:26C-7.2 and the Technical Requirements for Site Remediation, specifically N.J.A.C. 7:26E-5.1(d) and 5.1(f) a deed notice will be required for this area. In addition, it must be demonstrated that any remedial alternative will provide adequate protection, that contamination exposure can be controlled and all current and future uses of the site will be consistent with the remedial action. The Department has a model deed notice which must be used, and can be found on the Department's website at <http://www.state.nj.us/dep/srp/srra/forms/>.

The Department notes that a 2005 Site Investigation Report recommended excavating the arsenic-contaminated soils to a depth of five (5) feet.

Army Response to Point #3: *With regards to compliance with Technical Requirements for Site Remediation at N.J.A.C. 7:26E, the DoD/Army is not subject to this requirement. The Army is bound by the federal requirements of CERCLA and the NCP. We follow the promulgated USEPA guidance documents and standards. Absence of USEPA authority does not mean we are subject to state CERCLA-like regulations. The only time state risk numbers or state remediation regulations are applied to federal remediations is when the risk assessment shows an unacceptable risk that triggers a response. The contaminated soil is wholly located within new site CC Site 04. As part of the planned RI/FS at CC Site 04 in 2016, a CERCLA risk assessment will be performed. If unacceptable risks to the current and reasonably anticipated future land uses are found, then ARARs will be triggered and an appropriate remedy for the site will be implemented.*

NJDEP Point #4: It appears that neither the horizontal nor vertical extent of arsenic (and potentially lead) soil contamination is known. Delineation soil sampling to the current NJDEP Soil Remediation Standard of 19 ppm arsenic must be conducted to determine the extent of impacts. If excavation is the anticipated remedial action, pre-excavation soil sampling may be

acceptable; however, a remedial action work plan, submitted by the Army and approved by the Department, with the detailed analytical results and proposed remedial actions would be required prior to any excavation activities.

Army Response to Point #4: *Please see Army response to point #2.*

NJDEP Point #5: Groundwater sampling in the area of the former fueling station (area of potential environmental concern (AOPEC) #16) showed low level tetrachloroethene (PCE) contamination [i.e. <3 parts per billion (ppb)] and moderate arsenic (33 ppb) and lead (68 ppb) contamination. The highest concentrations of arsenic and lead were from temporary well points. The arsenic and lead groundwater quality exceedances from monitor wells were slightly above the NJDEP Ground Water Quality Standards in some cases. PCE contamination does not appear to be widespread.

A CEA will need to be implemented for the PCE, arsenic and lead. No CEA is proposed in the subject document.

Army Response to Point #5: *The CERCLA risk assessment results for the groundwater pathway showed acceptable risks for all receptors (i.e., HI less than 1 and cancer risks lower than 1.0E-04), including the residential scenario (HI = 0.09 and cancer risk = 4.31E-06). Under CERCLA, if there is no unacceptable risk, there is no requirement to look to state standards for an ARARs analysis, so even if the state standards are lower than the Federal cleanup levels, they do not trigger a risk that requires a remedial action or implementation of a CEA.*

NJDEP Point #6: If NJDEP concurrence is desired, the remedy must meet NJDEP's acceptable risk level of 1.0E 10-6. Additionally, the Department's Soil Remediation Standards (SRS) do not differentiate between adult and child residential use.

Army Response to Point #6: *The cleanup at site CC Site 03 at Sievers Sandberg USARC is being conducted under the federal CERCLA law. Under the CERCLA process, unacceptable site-related risks are required before restoration actions are needed and can be taken. Risk assessments have been conducted at site CC Site 03 in accordance with USEPA risk assessment guidance, and no unacceptable risk has been found for any current and/or reasonably anticipated future use. Further, there are no adverse impacts to ecological receptors. As such, no action is appropriately recommended under the CERCLA process.*

NJDEP Point #7: Documentation is requested regarding whether any investigation has been performed regarding UXO/MEC.

Army Response to Point #7: *In June 2003, the Army conducted an inventory of Closed, Transferred and Transferring Ranges on Camp Pedricktown. Three ranges were identified (CP-001-R-01, CP-002-R-01 and CP-003-R-01). Following the inventory of these sites with potential UXO/MEC, it was determined that all 3 sites were duplicates of existing Formerly Used Defense Sites (FUDS) sites. As such, the 3 sites were made*

Response Complete in the Active Army database and all actions required at the 3 sites will continue under the Formerly Used Defense Sites (FUDS) program. Unfortunately, at this time the Army's electronic document repository is not functioning and we have been unable to locate a paper copy of this document. When the document is located, it will be provided to NJDEP for your records.

NJDEP Point #8: Documentation currently provided by the Army provides insufficient sample data in support of the no response action alternative for OU1/CC Site 03.

Army Response to Point #8: *Using the historical sampling data contained in the original risk assessment, the Army determined where contamination existed at the installation, which allowed us to associate that contamination with either the existing site (CC Site 03) or the new site (CC Site 04). All arsenic contamination was located in the building 434 and 464 area (i.e., within the new site) and this was the only contaminant that produced unacceptable risk results. The HHRA results for CC Site 04 were calculated after eliminating the arsenic data and produced risk levels that qualify the site for unrestricted use.*

COMMENT NUMBER 2: VERBAL COMMENT RECEIVED ON MARCH 3, 2015 FROM SEVERAL ATTENDEES AT THE PUBLIC MEETING: Several attendees requested clarification on the next steps to be engaged with the 99th and or the General Services Administration (GSA) in order to move forward in the property (OU1) acquisition process.

Army Response to Comment No. 2: *The Department of Education (DoE) has previously approved a small parcel on the east side of Artillery Ave be conveyed at no cost to Salem Community College. This parcel is contained within CC Site 03 (identified as "Tract 2" on the GSA survey of the property). Once Army has completed the environmental restoration process at CC Site 03, GSA will assign "Tract 2" to DOE and DOE will in turn deed "Tract 2" to Salem Community College. With regards to the remaining portion of CC Site 03, GSA will consider whether further parcelization is in the best interests of the Government. For the time being, GSA intends to sell the remainder of CC Site 03 (OU1) and CC Site 04 (OU2), upon the Army's completion of all required environmental restoration actions. Sara E. Massarello, GSA Real Property Utilization and Disposal Division, is managing the land acquisition/transfer/sale actions at the site.*

COMMENT NUMBER 3, VERBAL COMMENT RECEIVED ON MARCH 3, 2015 FROM MR CORDY TAYLOR, DEPUTY MAYOR, OLDMANS TOWNSHIP, AT THE PUBLIC MEETING: Mr. Taylor expressed interest in understanding the process and timeline associated with future site investigation and/or remedial actions to be performed on the remaining 4-acre parcel (designated as OU2- CC Site 04).

Army Response to Comment No. 3: *The Army plans to award a contract in fiscal year 2016 for the performance of an RI/FS and PP/DD at CC Site 04. It normally takes 2-4 years to investigate a site, perform the cleanup alternatives evaluation, perform the*

public participation requirements and decide on a remedy. Following the DD publication, the remedy is implemented. The average timeline is 2 years for remedy implementation.

9.0 REFERENCES

CATI Inc., 2006. CATI Incorporated. Final Sampling Summary Report Follow-On Closure Activities. Lanham, Maryland

Kemron Environmental Services, 2005. Final Site Investigation of Specific Areas of Potential Environmental Concern at the Reserve Enclave at Camp Pedricktown, Vienna, Virginia

PARS, 2014. Focused Investigation Report, Sievers Sandberg USARC (Camp Pedricktown Reserve Enclave), Oldmans Township, Salem County, New Jersey

USACHPPM, 2006. Continued Site Investigation Addendum No. 38-EH-0606-07, U.S. Army Reserve Command, Camp Pedricktown Reserve Enclave, Building 434 and AOPEC Nos. 12 and 16, Oldmans Township, New Jersey, 25 October - 14 December 2006

USACHPPM, 2008. Draft Final Health Risk Assessment NO. 39-DA-07ZE-08, Camp Pedricktown Reserve enclave, Oldmans Township, New Jersey, January 2008

FIGURES

Figure 1: Site Location Map of Sievers-Sandberg USARC, NJ

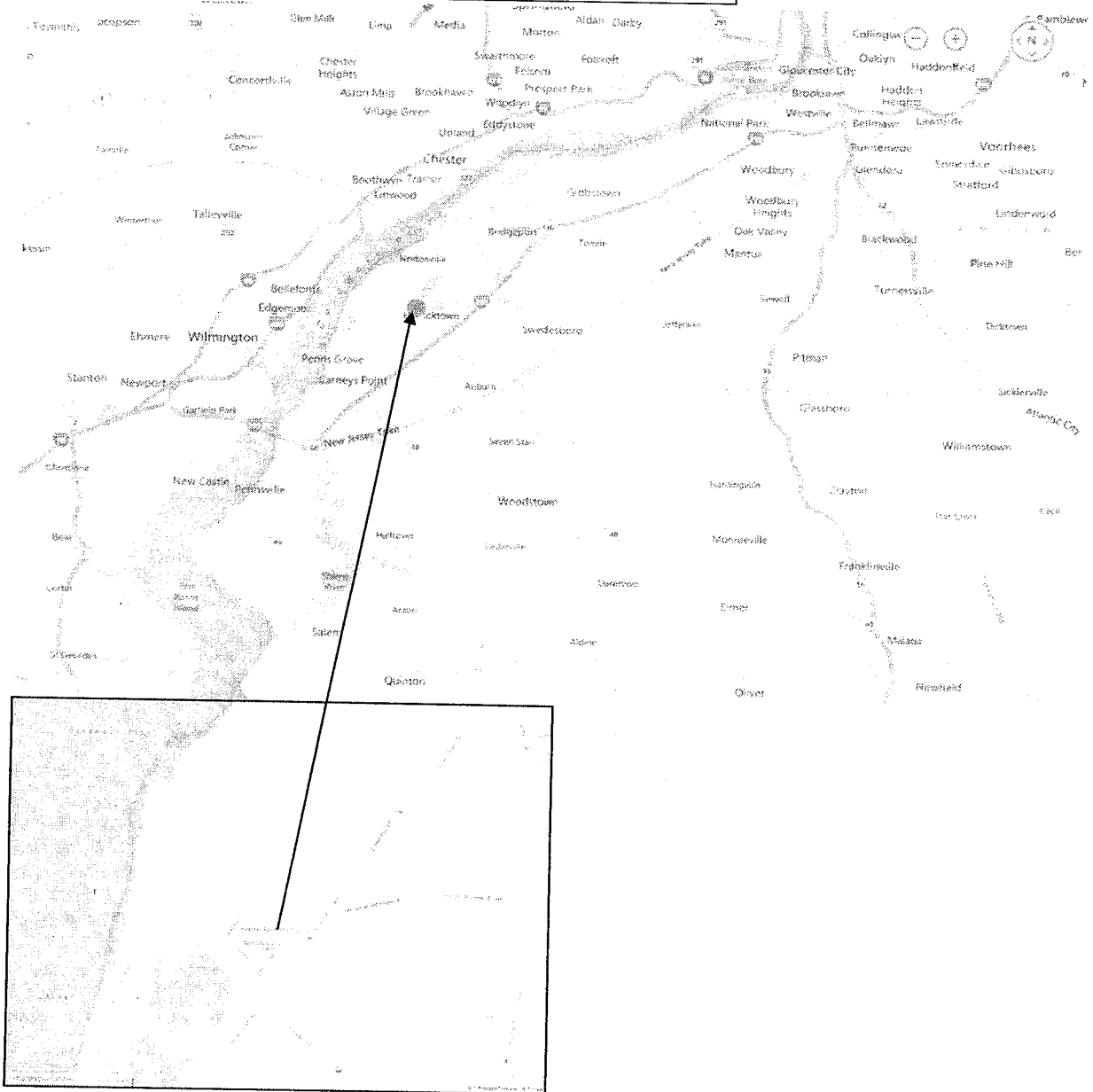
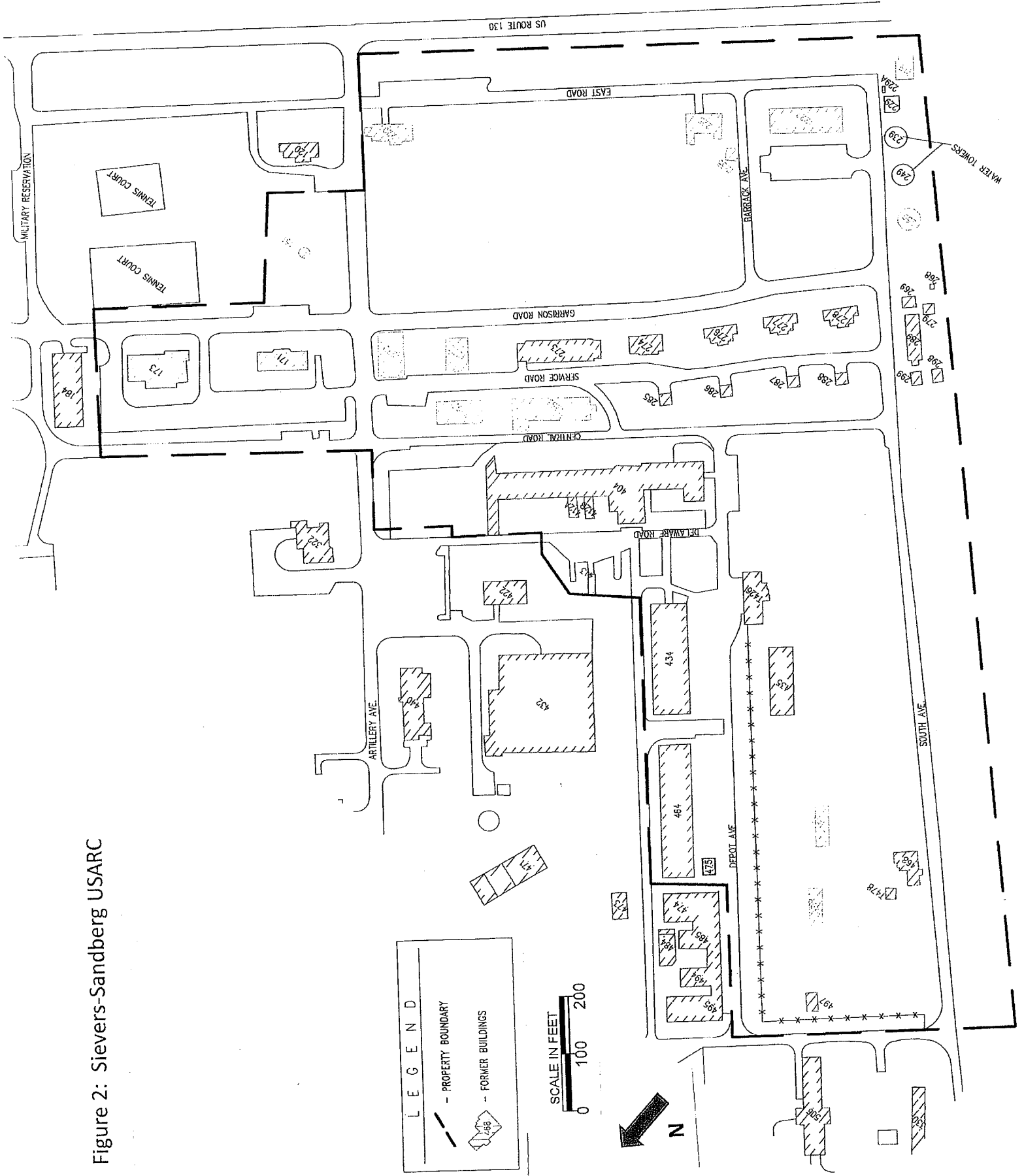


Figure 2: Sievers-Sandberg USARC



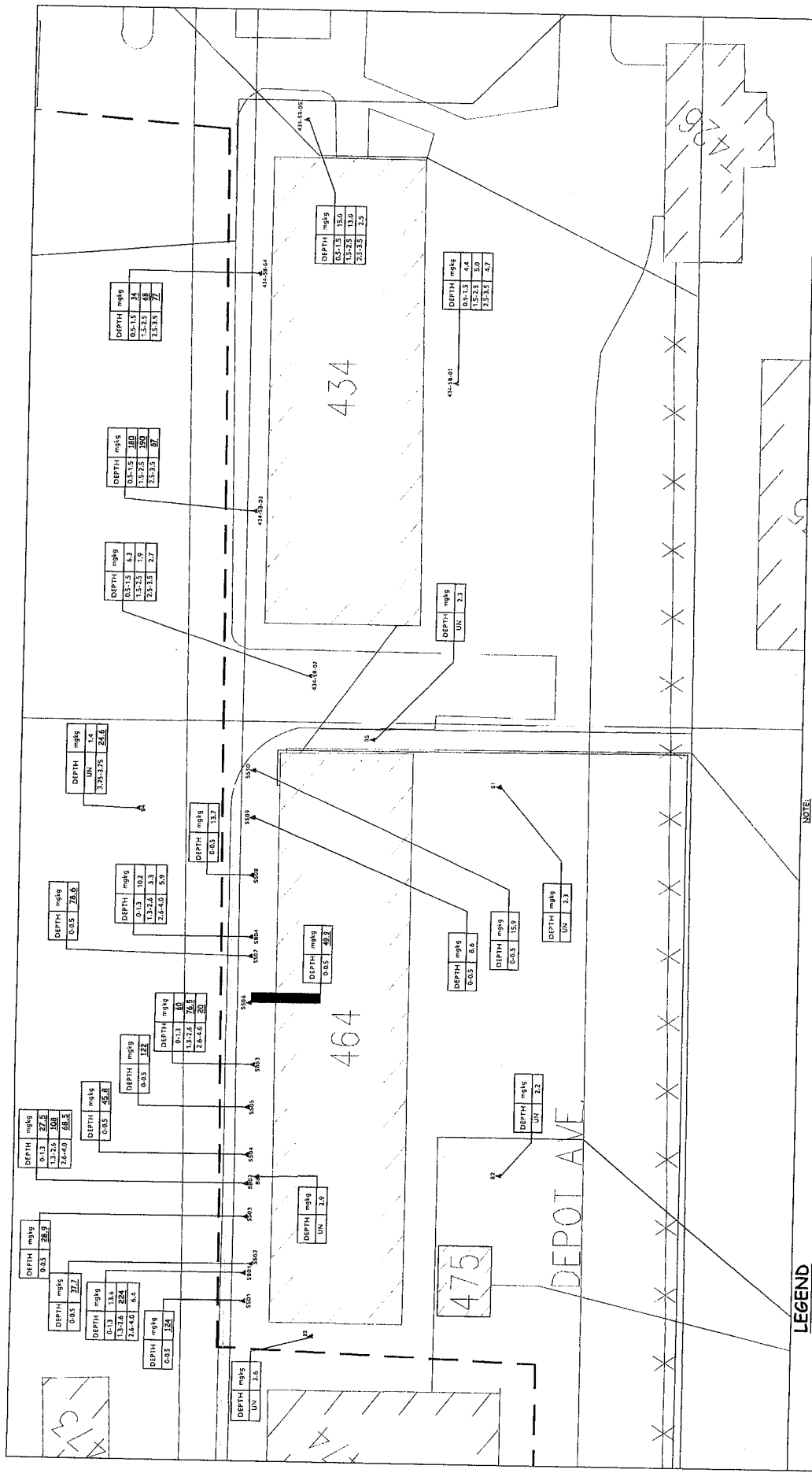
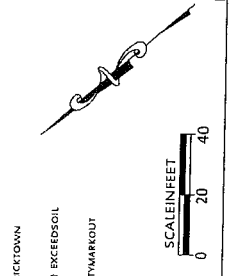


FIGURE XX. 3
HISTORICAL SOIL ANALYTICAL RESULTS
CAMP PEDRICKTOWN
OLDMANS TOWNSHIP, NEW JERSEY

PARS ENVIRONMENTAL, INC.
 ROBINSONVILLE, NEW JERSEY

DR. BY:	KH	SCALE:	1"=40'	JOB No.:	855-06
CK'D. BY:	AM	DATE:	10.17.13	FILE NO.:	855-06
REV. NO.:	--	REV. DATE:	10.24.13	FIGURE NO.:	3



- NOTE:**
- 1. UTILITIES BASED ON NJ & DIRECTORATE OF PUBLIC WORKS PEDRICKTOWN GENERAL UTILITY MAP (PAUG2005)
 - 2. CONCENTRATIONS HIGHLY VARIABLE IN UNSATURATED SOIL
 - 3. RECIPIENT STANDARD FOR RESIDENTIAL USE (mg/kg)
 - 4. TELECOMMUNICATIONS IDENTIFIED DURING PRIVATE UTILITY MARKOUT (1/16/13)

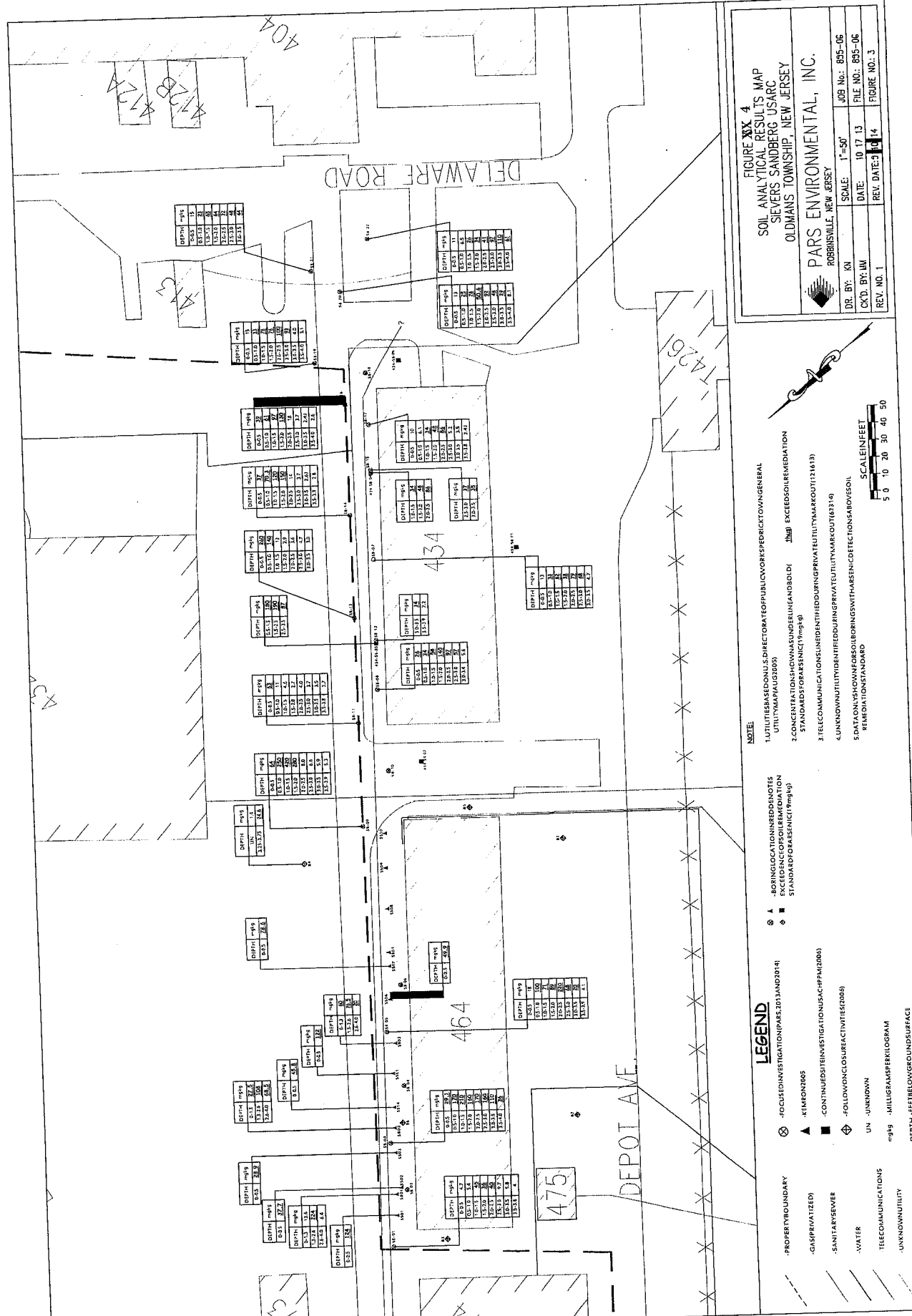
LEGEND

- PROPERTY BOUNDARY
- ELECTRIC
- GAS (PRIVATE)
- SANITARY SEWER
- WATER
- TELECOMMUNICATION
- KENONZD05
- CONTINUED SITE INVESTIGATION (SACHPPM2I6)
- FOLLOW-UP CONC. REACTIVITY (F009)
- UN - UNKNOWN
- MLLIGRAM FERTILIZER
- DEP. TH - FEET BELOW GROUND SURFACE

FIGURE XIX 4
SOIL ANALYTICAL RESULTS MAP
SIEVERS SANDBERG USARC
OLDMANS TOWNSHIP, NEW JERSEY

PARS ENVIRONMENTAL, INC.
ROBINSVILLE, NEW JERSEY

DR. BY: KN SCALE: 1"=50' JOB NO.: 895-06
CK'D. BY: UM DATE: 10.17.13 FILE NO.: 895-06
REV. NO. 1 REV. DATE: 05/14 FIGURE NO. 3



NOTE:
1. UTILITIES ARE SHOWN AS RECEIVED. CONTACT TOWNSHIP FOR PUBLIC WORKS DEPARTMENT FOR GENERAL UTILITIES (MAPALG2009).
2. CONCENTRATIONS SHOWN IN UNITS AS LISTED IN THE STANDARD FOR ARAISEN (Tmg/g).
3. TELECOMMUNICATIONS IDENTIFIED BY THE COMMUNICATIONS IDENTIFICATION AND MAPPING (T21613).
4. UNKNOWN UTILITIES IDENTIFIED BY THE COMMUNICATIONS IDENTIFICATION AND MAPPING (63314).
5. DATE ON WHICH WORK FOR SOIL BORING WITH ARSENIC DETECTION AND REMEDIATION STANDARD

LEGEND
- FOCUSED INVESTIGATION (IPARS.2013.AND.2014)
- BOREHOLE LOCATION (RED DENOTES EXCEEDENCE OF SOIL REMEDIATION STANDARD) (DRAISEN (Tmg/g))
- REMEDIATION
- CONTINUOUS REMEDIATION INVESTIGATION (SACHPAR.2008)
- FOLLOW-UP ON CLOSURE ACTIVITY (IESZ008)
UN - UNKNOWN
- TELECOMMUNICATIONS
- UNKNOWN UTILITY
DEPTH - FEET BELOW GROUND SURFACE

PROPERTY BOUNDARY
- GAS PIPER (UTILIZED)
- SANITARY SEWER
- WATER
- TELECOMMUNICATIONS
- UNKNOWN UTILITY

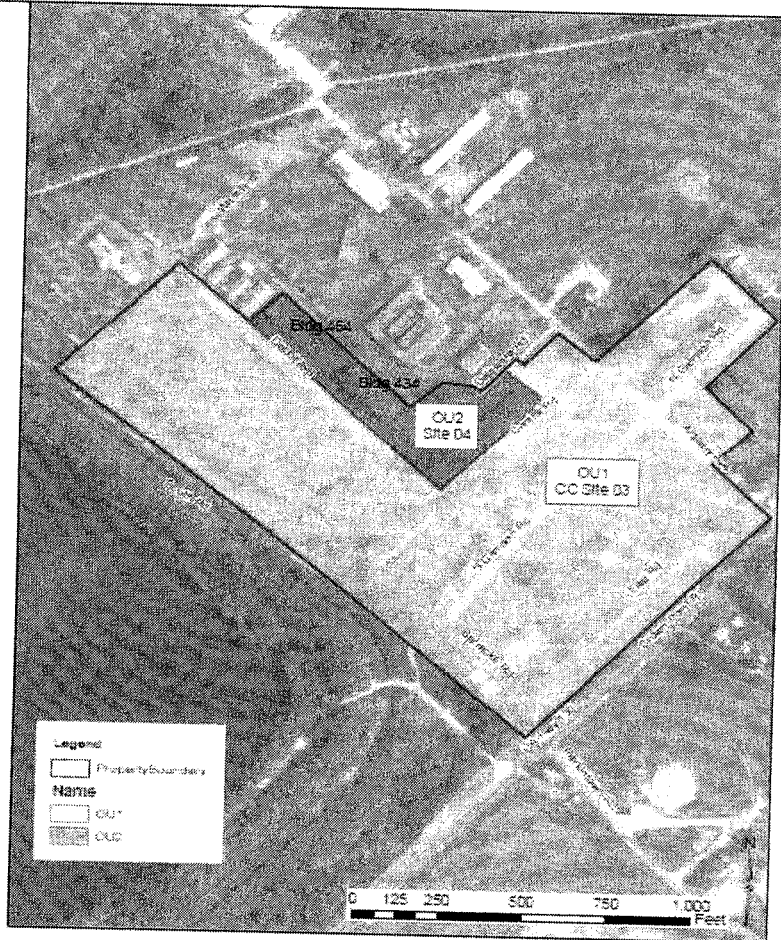
SCALE IN FEET
5 0 10 20 30 40 50

GENERAL PUBLIC WORKS DEPARTMENT FOR
TOWNSHIP OF ROBINSVILLE, NEW JERSEY

ROBINSVILLE, NEW JERSEY

DEPOT AVE

Figure 5: Site Names and Operable Units



Drawn by: Cynthia Judd
cynthiayjudd.dvw@gmail.com
August 8, 2012

APPENDIX A

Newspaper Notices

PROPOSED PLAN FOR CC SITE 03 SIEVERS SANDBERG UNITED STATES ARMY RESERVE CENTER

INTRODUCTION AND PURPOSE

This Proposed Plan (PP) provides information necessary to allow the public to participate with the U.S. Department of the Army (Army) in amending the 2012 Decision Document (DD) of Sievers Sandberg US Army Reserve Center (USARC) in Clinton Township, Salem County, NJ. Sievers Sandberg USARC (the Site) is not included on the National Priorities List.

This PP is issued in accordance with Section 117 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Section 40 of 40 CFR 300.402 (OSPL), of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), which states that the CO requires an amendment if the differences in the remedial action levels identified in the baseline of the selected remedy with respect to scope, performance, or cost. This Decision Document amendment will become part of the Administrative Record (AAR) (40 CFR 300.605(a)(3)).

The original DD for CC Site 03 was signed in September 2012 and selected Land Use Control (LUC) as the preferred remedy. This PP proposes an amendment to that remedy. A new addition to the site and site use that support the separation of CC Site 03 into two separate Operable Units (OU) are that: (1) OU Site 03a) human health and the environment (HHE) (OU), the original site (OU Site 03) and one that retains LUC as the original selected remedial action to prevent unacceptable risks to human health and the environment (OU); the new site (OU Site 03). This proposed DD Amendment also amends existing OU1 with No Further Action Necessary.

SCOPE AND ROLE OF THE RESPONSE ACTION

The 2012 DD for CC Site 03 selected LUC as the preferred remedy for the Sievers Sandberg USARC and site.

"LUC shall be maintained until the concentrations of arsenic in the soil are reduced to levels that allow for unlimited use and unrestricted exposure. It is the Army's current judgment that the Preferred Alternative (PA) is necessary to protect public health from releases of contaminants from the site which may present an imminent and substantial danger to public health or welfare. If the hydrogeologic area is subsequently re-evaluated to unrestricted use, the DD will be amended to allow the LUC as part of the remedy. CERCLA 117(d) 5-year reviews shall be conducted to assess the long-term effectiveness of the remedy including LUC.

Although the United States Army transferred its remedial responsibilities to another party by contract, presently the Army, or through other means, the United States Army retains responsibility for the site. It is the Army's intent to include (1) CERCLA 117(d) 5-year reviews; (2) notification of the appropriate regulatory and/or local government representatives of any known LUC deficiencies or violations; (3) provision of access to the property to conduct any necessary response; (4) the ability to change remedy; or (5) enforce LUC and any related deed or lease provisions; and (6) assurance that the LUC objectives are met to maintain remedy performance.

If the United States Army determines that there is no compliance with the LUC, the Army will address the site through the LUC, including any required notification and corrective measures."

SUMMARY OF THE SITE RISK

The baseline risk assessment and analysis, which risk the facility contained in place. If no actions were taken, it provides a baseline for future action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action. This section of the DD summarizes the HARA for the Site.

The contaminants of potential concern (COPCs) in soil and groundwater evaluated in the HARA are shown in the table below:

Arsenic	Polychlorinated Biphenyls
Cadmium	Nitrate
Chromium	Soil
Copper	Hexachloro epoxide
Lead	Toluene
Zinc	1,1,2,2-Tetrachloroethane

Exposure pathways were considered for all receptors by inhalation, ingestion, and dermal contact to soil. The hydrogeologic site conditions are that industrial workers, construction workers, and soil residents are exposed to soil. The LUC is acceptable range of 1.0 to 4.0 mg/kg for arsenic, 1.0 to 1.0 mg/kg for lead, 1.0 to 1.0 mg/kg for zinc, 1.0 to 1.0 mg/kg for copper, 1.0 to 1.0 mg/kg for chromium, 1.0 to 1.0 mg/kg for cadmium, 1.0 to 1.0 mg/kg for nickel, 1.0 to 1.0 mg/kg for hexachloro epoxide, 1.0 to 1.0 mg/kg for toluene, and 1.0 to 1.0 mg/kg for 1,1,2,2-tetrachloroethane.

The non-carcinogenic risk characterizations results for industrial workers, construction workers, and soil residents are shown in Tables 2.1, 2.2, and 2.3, respectively. These results do not exceed the LUC. The HARA for the Site shows that the non-carcinogenic risk exposure to soil was 0.04, which is less than the LUC. The soil concentration during the unacceptable risk was 0.04, which is less than the LUC. The soil concentration during the unacceptable risk was 0.04, which is less than the LUC.

The HARA concluded that there is no unacceptable risk to the current use of the site, industrial worker or construction worker, but there is risk to the future child resident.

DESCRIPTION OF SIGNIFICANT DIFFERENCES

The 2012 DD selected the preferred remedy of LUC for the entire 40-acre parcel of CC Site 03 in response to the risk associated with the future hypothetical child resident. Upon clearances of the HARA and the evaluation of the Site, the Army is proposing in this amendment to separate CC Site 03 into two separate areas: Operable Unit 1, or OU1.

The OU1 is the portion of the site (36 acres) was not impacted or controlled by arsenic, as determined by the HARA, and therefore, no response action is required. These 36 acres can be used for unrestricted use and unrestricted exposure (LUC). The boundary of OU1 (36 acres) is shown in Figure 1.

The evaluation of the HARA revealed the concentration of arsenic in the higher concentrations of arsenic only occur approximately 10% of the property (4 acres), OU2, the Building 464 and 464 Area, identified as Site 04 in AERDA (see Figure 1), will continue to be subject to LUC, while further evaluation of soil and the remediation alternatives are re-evaluated. The LUC associated with the proposed soil with the 4 acres of Site 04 will continue to apply to that sub-Parcel, now re-named as OU2.

COMMUNITY PARTICIPATION

Public participation is an important component of remedy selection. The Army, with support from NJDEP, is soliciting input from the community on the DD Amendment. The comment period ends from Dec. 22, 2014 (March 2, 2015 (90 days). The Army will accept written comments. The Army will provide a 30-day comment period to allow the public an opportunity for involvement in the decision-making process for the proposed amendment. The public is encouraged to review and comment on this PP. During the public comment period, the public is encouraged to review the Administrative Record for the Site. The Administrative Record is available at:

88th Regional Support Command
Public Affairs Office
5201 South Scott Place
John J. Bica MBL, NJ 08041

To obtain further information, the following representatives may be contacted:
SMA HW/MORRIS
Dapo P. PAC Command Information Chief
E-Mail: John.A.Morris@army.mil

If the public would like to comment in writing on the PP or other relevant issues, comments should be delivered to the Army or mailed to:

SMA HW/MORRIS
Dapo P. PAC Command Information Chief
88th Regional Support Command
5201 South Scott Place
John J. Bica MBL, NJ 08041

The Army will hold a public meeting to accept comments on this Proposed Plan (PP) to amend the 2012 Decision Document (DD) on March 2, 2015 from 6 p.m. at Salem Community College, 460 Holywood Avenue, Galloway Point, NJ 08041.

This meeting will provide an opportunity for the public to comment on the proposed amendment. Comments received at the meeting will be recorded. A copy of the transcript will be included in the DD Amendment. Summary and will be included in the Sievers Sandberg Administrative Record and Information Repository.

The Army will review the public comments as part of the process in reaching a final decision on the DD Amendment. The Army's final decision on the Amendment will be included in the DD Amendment. Comments received on the DD Amendment, and responding to written comments, will be included with the DD Amendment. Once comments response and input are received and the Army signs the DD Amendment, it will become part of the Administrative Record.

IMPORTANT DATES AND LOCATIONS

Public Meeting: March 2, 2015 from 6 p.m.
The Army will hold a public meeting to accept comments on this Proposed Plan (PP) Amendment and the significant differences in the current and proposed Response Action, presented in this document. Oral and written comments will also be accepted at the meeting. The meeting will be held at Salem Community College, 460 Holywood Avenue, Galloway Point, NJ 08041.

Public Comment Period:
Dec. 22, 2014 - March 2, 2015

The Army will accept written comments on the PP during the public comment period at the following address:

Dapo P. PAC Command Information Chief
88th Regional Support Command
5201 South Scott Place
John J. Bica MBL, NJ 08041

The Administrative Record, containing information used in selecting the preferred response action, is available for public review at the following location:

88th Regional Support Command
Public Affairs Office
5201 South Scott Place
John J. Bica MBL, NJ 08041

REMEDIATION ALTERNATIVES

Soil Remedial Alternatives:
2012 Remedial Alternative: LUC for entire Site

2014 Decision Document Proposed Amendment:

- Separate Site into two OUs
- OU1 poses no remedial action necessary to ensure protection of human health and the environment
- OU2 retains the original site as live of LUC to prevent unacceptable risks

SITE BACKGROUND

The 1965 Base Realignment and Closure (BRAC) Commission recommended Camp Patrick for closure. The United States Department of the Army retained a portion of Camp Patrick (known as the Site) to support the closure of the United States Army Reserve.

The Sievers Sandberg USARC is an approximately 40-acre parcel located in the northeast section of Clinton Township, Salem County, New Jersey. This DD Amendment addresses the proposed changes to remedy selection for the soil impacts of the Sievers Sandberg USARC, identified as Army Environmental Database-Action Unit (AEDB-Formerly CC Site 03).

The facility was originally part of the Delaware Ordnance Depot that was established in 1917. It is currently vacant. From the 1950s to 1970s, the facility was used to support administrative, supply, training and maintenance activities for the United States Army Reserve. Most of the buildings located at the Site were constructed prior to World War II.

The United States Army as the lead agency pursuant to Executive Order 12580, is proposing this DD Amendment for CC Site 03 at the Sievers Sandberg USARC in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), to the extent applicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the Delaware Environmental Remediation Program (DERP).

SITE CHARACTERISTICS

Buildings 464 and 464 are adjacent to each other and are part of the manufacturing area of the facility as shown in Figure 1. An asphalt road (Depot Avenue) is located in front of the buildings, while a gravel access road (Railroad Avenue) runs parallel and behind both buildings. The gravel access road contains coal slag, which was used as the base for the road. In 2005, 10 samples collected for surface soil and ten subsurface soil samples, each of Building 464, along Railroad Avenue. Seven soil samples and seven subsurface soil samples, contained concentrations of arsenic that exceeded the NUSOL Remedial Action Standard for Arsenic of 20 mg/kg.

In September 2006, OMT conducted an investigation of Building 464 and collected soil samples from six soil borings around the perimeter of the building. In addition, one sample was collected from the roadway (Depot Avenue) located adjacent to Building 464 and one sample was collected from the coal slag (identified as Railroad Avenue). Arsenic was detected in the coal slag sample at a concentration exceeding the Remedial Action Standard, but was not detected above the Remedial Action Standard in the other samples.

In December 2006, United States Army Center for Health Promotion and Preventive Medicine (USACHPPM) under Public Health Command, conducted an investigation of Building 464. Soil borings were collected in the local area and three soil samples were collected from each boring. Arsenic was detected at concentrations above the Remedial Action Standard in two samples.

In 2006 a USACHPPM Human Health Risk Assessment (HHRA) concluded that exposure to arsenic in soil at the Site was not a concern for residential risk exposure was 1.0E-10-4 which is slightly above the USEPA's acceptable risk range of 1.0E-10-4 to 1.0E-10-5. The total hazard index was 2.45, which is above threshold of 1. Most of the total risk is due to Arsenic.

