

Morgan RI/FS							
Revised Draft Final MR-QAPP (June 2025)							
NJDEP Comments and PDT Responses							
Number	Commenter	Page	Section	Type	Comment	USACE Response (7/2/25)	NJDEP Response (8/18/25)
1	MEC	20	1	Site Overview	Please provide information on where the Morgan General Ordnance Depot conducted their production quality control testing (i.e. proving grounds).	The Morgan Ordnance Depot consisted of loading and storage areas. Production quality control testing areas (proving grounds) at Morgan are not reported in any of the archive or historical documents.	Accepted
2	MEC	20	1	Site Overview	Please advise whether there were any records of munitions and explosives of concern (MEC) being identified during the construction of the Garden State Parkway.	Archive or historical documents, to include the ASR and HDR, do not report any records of MEC associated with construction of the Parkway.	Accepted
3	MEC	22, 25	WS1, WS3, WS5	Lead Organization's QA Manager	Please provide the name and contact information for the US Army Corps of Engineers Baltimore District (CENAB's) Quality Assurance (QA) Manager or QA Geophysicist.	Revised per comment.	Accepted
4	MEC		WS3, WS5	QC Geophysicist	Please reconcile Quality Control (QC) Geophysicist with Project Organization Chart (Harry Wagner vs. Kyrian Onyekwue).	Revised per comment.	Accepted
5	MEC	33	WS6		Please specify that Major QAPP Changes are any revisions to the QAPP that may impact the Data Quality Objectives (DQO), Measurement Quality Objectives (MQO), Quality Control or Technical aspects of a Standard Operating Procedure (SOP).	Additional text included: "Major changes include revisions that may impact DQO, MQO, QC, or technical aspects of a SOP."	Accepted
6	MEC	38	Table 10-1		Potential or Suspected Location and Distribution-Please note that the last sentence is incomplete. Recommend revising to, "It is currently noted that exposure to surface MEC is very unlikely." Please revise accordingly.	Revised per comment.	Accepted
7	MEC	38	Table 10-1		Source or Exposure Medium does not include the MRS-02 water bodies. This is a global CSM comment. There are no identified site users/receptors for the water bodies. Please identify underwater receptors (i.e. hunters, swimmers, fishermen, etc.) Recommend, "Surface, below	Revised. Added receptors for the water bodies and also revised Table 10.1 to match text and CDM figures.	Accepted
8	MEC	38	Table 10-1		Potential Complete Exposure Pathway does not include the water bodies. This is a global conceptual site model (CSM) comment. Recommend adding, "In surface and subsurface soil and underwater, human receptors' exposure pathways are potentially complete."	Revised per comment.	Accepted
9	MEC	39	Table 10-1		Potentially Complete Pathway does no include water areas and has some grammatical errors. Recommend, "In surface and subsurface soils, the presence of explosives could result... In underwater sediment, the presence of explosives could result ..."	Revised per comment.	Accepted
10	MEC	42	10.2.4.3		The last Paragraph states that Sectors 4, 7 and 15 can be found in Figure 10-4. Please add Sector 15 to Figure 10-4.	Revised per comment.	Accepted
11	MEC	42	10.2.4.4, 10.2.4.5		In 1994, a Time Critical Removal Action (TCRA) removed MEC to a depth of 2-ft in the Eisenhower School area and the 60-acre area south of Erntson Road. 2,625 MEC were removed. Then in 1994 to 1997, the same 60-acre TCRA boundary had a MEC removal down to 4 ft with 2,379 additional MEC removed. There were no additional removal actions for the Eisenhower School area, however, it is likely that MEC remains in higher densities in the school area below 2 ft and per the "Certificate of Clearance" MEC should be suspected below the depth of 4-ft. Section 10.2.4.1 acknowledges the depth profile for MEC is 6-ft below grade surface (bgs). Please explain why the project design does not use the previous higher anomaly density areas on the school grounds where the TCRA took place to add grids to ensure that MEC in this public area has been fully characterized. AGC Grids should also be added to the 60-acre clearance depth to determine if MEC exists below 4-ft to understand the vertical depth profile for MEC in these two areas. Accordingly, please add a grid to the high-density areas identified by the TCRA at the Eisenhower School and the 60-aacre TCRA area to fully characterize the areas where MEC were removed down to 2-ft and 4 ft, respectively.	AGC geophysical surveys will be conducted on the Eisenhower School grounds as part of the developed properties outlined in 17.2.3. Figure 17-1 was revised to include six 100' grid surveys on the school property. Additionally, ROE agreements will be requested for AGC geophysical surveys within the 60-acre TCRA footprint. Note green space within the 60-acre TCRA footprint is very limited and the primary property owner (housing developer) has not been receptive to previous ROE agreement requests.	Accepted
12	MEC		WS10, WS11		In Section 10.2.4.1 the depth profile for MEC is stated as 6 ft. Please advise what the detectable depths are for each of the suspected MEC Types for past technologies used during the TCRA's and engineering evaluation/cost analysis (EE/CA) included for comparison to the technologies depth of detection being proposed for the RI field work. As data deliverables in the RIR, the vertical CSM should be updated with the depths of discovered MEC/munitions debris (MD). Vertical CSMs should be established from the TCRA and EE/CA results and then updated with the RI field work results. A separate vertical CSM should be established for the craters as the MEC profile will likely be significantly different than other areas impacted by kickouts.	Table 10-2 updated to include maximum depth of MEC recovery for previous investigations. Vertical CSMs for subdivided or delineated sections of the MRS will be further established and can be presented separately based on RI data.	Accepted
13	MEC	49	10.3.5.1		Please include a section that discusses Apache Lake and its current and seasonal water levels. Worksheet (WS) 17 and elsewhere indicates that the lake may be dry and the mode for investigation will be altered to a land-based survey rather than a water born survey.	Text added: "West of the Garden State Parkway, a tributary of Cheesapeake Creek flows southeast through a series of wetlands with seasonal or intermittent inundation. Apache Lake occurs along this wetland complex. In its current state, the Apache Lake basin is filled in with sediment and is dominated by the invasive common reed (<i>Phragmites australis</i>). The Apache Lake water level is expected to be a few inches to 1-foot deep depending on season and precipitation patterns."	Accepted
14	MEC	58	10.5.2.2	Potential Receptors Water	No human receptors are identified. Only the Cheesapeake Creek is identified, omitting Apache Lake and the pond on the Carriage House Nursing Home, both suspected MEC disposal areas. Please identify potential human receptors in the water areas and what their likely activities might be (i.e. fishing, swimming clamming, hunting, etc.). Include any intrusive activity in which site users disturb the bottom sediment and the depths of those activities.	Text revised: "Surface water and sediment are potential media of concern, as Cheesapeake Creek and Apache Lake are present within the project boundary. Human receptors within the water bodies and sediment include residents, visitors/trespassers, commercial/industrial workers, construction workers, park workers, and recreational users (i.e. swimmers, fishers, hunters)."	Accepted

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15	MEC	58	10.5.3.1	Exposure pathway Land	Please list the intrusive activities expected for the various land activities. Maximum suspected depth profile for MEC is 6- ft. The CSM should clearly identify all activities and the intrusive depths for those activities to demonstrate where potential interaction with MEC may occur. The CSM should account for the removal actions that have occurred and clarify the interaction zones for the intrusive activities that may occur below the depths of clearance.	See response to comment 12. The text in 10.5.3.1 was revised to read: "MEC is potentially present at the MRS on or beneath the ground surface. Surface and subsurface soil has the potential for complete MEC exposure pathways for human receptors (Figure 10-13). MEC at the surface may be encountered directly or through non-intrusive activities, such as handling or stepping on an item, or migration of MEC to the surface through erosion or frost heave. MEC at the surface is expected only in undeveloped portions of the MRS. MEC in the subsurface may be encountered through intrusive activities, such as excavation, digging, or burrowing (but this is not expected based on the limited site use). MEC has been found in the subsurface at depths ranging from just below the ground surface to 14 feet. For the purposes of the RI, receptor access to MEC in the shallow subsurface (less than 4 feet) is potentially complete for any receptor (i.e., property owners, workers, current and future residents, tenants, and visitors/respassers) conducting intrusive activities throughout the MRS. This includes previous removal action footprints due to uncertainties related to prior work (e.g., cut/fill, technology limitations). Receptor access to MEC at depths deeper than 4 feet is limited to those engaged in construction or mechanical earth moving activities. Inhalation (dust), dermal contact, and incidental ingestion of MC are potential exposure routes for exposure to MC in soil (Figure 10-14). Incidental ingestion and dermal contact are potential exposure routes for soil, sediment, and surface water. All receptors are anticipated to be exposed to surface soil. For MC present in subsurface soil (i.e., greater than 1 foot bgs and less than ten feet bgs), the receptor population with potentially complete pathways are construction or utility workers. In the future, residential receptors may contact subsurface soil contaminants that are brought to the surface from excavation or digging.	Accepted
16	MEC	58	10.5.3.2	Exposure pathway Water	Please provide CSM figures for the various water bodies found in MRS 2.	Figures 10-15 and 10-16 have been created to address the water areas under investigation within MRS-02. Note Apache Lake is currently marshland with varying levels of water throughout the year.	Accepted
17	MEC	59	10.6.3.a	Data Gaps and Spatial Data	Please include all potential water areas (i.e. missing the pond on the Carriage House Nursing Home).	The pond located near Carriage House Nursing Home referenced in some of the past investigations is currently named Apache Lake.	Accepted
18	MEC	61	11.1		Please explain why the pond on the Carriage House Nursing Home is omitted.	The pond located near Carriage House Nursing Home referenced in some of the past	Accepted
19	MEC	71	11.5.2		Please note that when determining high use area (HUA) and low use area (LUA) please include all of the past historical MEC discoveries in the densities along with the RI data collected.	Text revised: "Data generated during the geophysical and intrusive investigations will be used in combination with historic MEC finds to further characterize and define the Preliminary HUA and LUA."	Accepted
20	MEC	71	11.5.2		Please clarify if targets of interest (TOIs) in the advanced geophysical characterization(AGC) Parcel Surveys will be investigated.	Added text to indicate TOIs will be investigated in the Parcel Surveys.	Accepted
21	MEC	73	11.5.2.1.2		Decision Rule #2. Please clarify and provide details when stating "Weight of Evidence". Historical and reported discoveries along with RI data collected should be included when determining a HUA or extending the HUA boundaries outside of MRS 02 boundaries.	Added text to clarify weight of evidence: "(i.e. historic finds, RI data) "	Accepted
22	MEC	76	11.5.3		Please update the "Military Munitions Risk Management Methodology (RMM)" to the July 14, 2023, Final RMM. Note: The RMM is no longer in its trial period.	Revised per comment.	Accepted
23	MEC	92	WS12B.1		Please delete this row. Section 11.5.1 states that NEU characterization is not expected to be	Revised per comment.	Accepted
24	MEC	95	Table 14-1		Please be advised that scheduled dates need to be updated. This is a global comment (i.e. Header row of Project Workflow Diagram).	MR-QAPP was reviewed and dates updated as appropriate. Table 17-1 was updated to use weeks instead of months to avoid continuous updates associated with minor field schedule fluctuations.	Accepted
25	MEC	114		Project Workflow Diagram	Please assign this diagram a Figure#.	Revised per comment.	Accepted
26	MEC	120	17.2.1.6		Please note that the 1st paragraph, last sentence is incomplete. Please complete this sentence.	Revised per comment. Last sentence in paragraph removed.	Accepted
27	MEC	122	17.2.4		In the 2nd paragraph, last sentence -Please specify the intended/most likely transect spacing for digital geophysical mapping (DGM) collected at Apache Lake and Cheesecake Creek.	Text revised: "DGM transect data will be collected over Apache Lake at a 6-m spacing and Cheesecake Creek at a 1-m spacing."	Accepted
28	MEC	129	17.2.4.3		Please explain in this section how Apache Lake will be intrusively investigated if water is present and is not deep enough to SCUBA dive or snorkel. If Apache Lake may have enough water to allow for SCUBA or snorkeling for intrusive investigations, please include this discussion.	DFW 9: Excavation of Subsurface Anomalies discusses intrusive operations. See response to comment #13 for information on Apache Lake. The first paragraph of 17.2.9 was revised to read "All anomalies placed on the finalized dig list will be reacquired using RTK and/or RTS for intrusive work. If subsurface anomalies are identified for intrusive investigation in Cheesecake Creek, the contractual option for a Dive Plan will be exercised, and the plan to address underwater anomalies will be developed, reviewed, approved, and provided under a separate cover. Water level in Apache Lake is expected to range between 1 inch and 1 foot and the sediment is anticipated to be approximately 2 feet deep. Anomalies in Apache Lake will be excavated as described below with UXO Technicians in waders working from plywood or other material laid across flattened intrusive reeds. Intrusive investigation in shallow water (< 2 feet) can be completed without a Dive Plan."	Accepted
29	MEC	133	17.2.10		"If material documented as an explosive hazard (MPPEH) is encountered, the Ordnance and Explosives Safety Specialist (OESS) will be notified, and the location secured until the government responds." Please explain what occurs when the government responds. Please advise if it is the responsibility of the USACE under this QAPP to dispose of MEC/MPPEH/MDRH or is it the USACE intentions to request assistance from Explosive Ordnance Disposal Units.	Text in 17.2.10 was revised to read: "IAW DoD Instruction (DoDI) 4140.62 and DoD Manual (DoDM) 4140.72, recovered MPPEH items will be visually inspected for the presence of explosive or other hazardous material and certified as either material documented as safe (MDAS) or material documented as an explosive hazard (MDRH). If MPPEH is encountered, the USACE OESS will be notified, and the location will be secured by the Contractor while disposal options are considered. In the unlikely event a fused munition is encountered that is deemed unsafe to move by both the SUXOS and UXOSO and cannot be destroyed in place, the SUXOS or OESS will initiate an emergency response through 911 or the local police. MEC/MPPEH deemed acceptable to move will be transferred by the Contractor to a pre-determined secure location for disposal or storage for later disposal. MEC/MPPEH will be explosively vented until it can be documented as MDAS in accordance with the CSRA and DoDM 4140.72. The Contractor will handle all the MDAS recovered items. The CSRA and DoDM 4140.72 was revised to read "Following fieldwork, a MEC risk assessment will be conducted using the MEC Risk Management Methodology (RMM) to address risks associated with explosive hazards and support the development of remedial action objectives (RAOs) for Morgan. The RMM will be used to evaluate the MEC exposure pathways and will consider site specific CSM factors developed from AGC data, TOI intrusive investigations, and well documented historical munitions finds (e.g., high use, low use, and no evidence of use areas; vertical MEC profile; and land use activities [e.g., coverage and frequency, intrusive activities, depths, and frequency]) that may influence risk associated with MEC exposure. Assessment areas will be defined for areas of different MEC characteristics and/or land use and risk scenarios will be developed for each assessment area based on receptor activities and interaction zones. Anomaly densities will be estimated across MRS 02 with data that will be used to develop detailed remedial action objectives (RAOs) for Morgan."	Accepted
30	MEC	143	17.2.15.2		Please include how historical MEC discoveries will be included in the RMM Tables in this section.	Section 17.2.15.2 was revised to read "Following fieldwork, a MEC risk assessment will be conducted using the MEC Risk Management Methodology (RMM) to address risks associated with explosive hazards and support the development of remedial action objectives (RAOs) for Morgan. The RMM will be used to evaluate the MEC exposure pathways and will consider site specific CSM factors developed from AGC data, TOI intrusive investigations, and well documented historical munitions finds (e.g., high use, low use, and no evidence of use areas; vertical MEC profile; and land use activities [e.g., coverage and frequency, intrusive activities, depths, and frequency]) that may influence risk associated with MEC exposure. Assessment areas will be defined for areas of different MEC characteristics and/or land use and risk scenarios will be developed for each assessment area based on receptor activities and interaction zones. Anomaly densities will be estimated across MRS 02 with data that will be used to develop detailed remedial action objectives (RAOs) for Morgan."	Accepted
31	MEC		Figure 10-4, 11-1		Please include call outs for EE/CA Sector 4/7 and the Eisenhower School MEC/MD quantiles removed during the TCRA.	Revised per comment.	Accepted
32	MEC	243	Figure 10-13		This figure does not include the potential for underwater MEC. Please revise accordingly.	Figures 10-15 and 10-16 have been created to address the water areas under investigation within MRS-02. Note Apache Lake is currently marshland with varying levels of water throughout the year.	Accepted
33	MEC	1087	Appendix E		Please update planned dates as necessary.	The schedule will be updated immediately prior to Final MR-QAPP submission to capture the planned baseline field schedule.	Accepted
34	MEC	1101	Appendix G		Please edit MRS from 01 to 02 on all applicable forms.	Revised per comment.	Accepted

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35	MEC	1365	Appendix N		Please edit MRS from 01 to 02 as applicable.	HDR is a Final document. A note will be added to the page that the correct reference is MRS 02.
36	MC		WK3, WK5		Please add Scott Vandy, scott.vondy@dep.16.gov, 609-940-4490 to the list of QAPP recipients.	Revised per comment.
37	MC		11.5.4.2	Surface Water Sampling	NJ Surface Water Quality Standards (SWQS) are promulgated standards and surface water samples should be compared to the SWQS per N.J.A.C. 7:9B. The decision to perform additional sampling should be based on a comparison of sample results to the SWQS and not the PALs.	Comment acknowledged. Also see response to comment 39. The surface water PALs are discussed in WS 15. N. J. A. C. 7:9B Surface Water Quality Standards will be considered as potential ARARs or TBC is the project proceeds to an FS. No changes needed.
38	MC		11.5.4.4	Groundwater	Pursuant to the Remediation Standards at N.J.A.C. 7:260-2.2, the Ground Water Quality Standards (GWQS) are the minimum remediation standards to which ground water shall be remediated. Any exceedances of the GWQS not attributable to natural background (demonstrated per NJDEP guidance) or offsite/1011-DoD sources will require an institution control in the form of a classification exception area and/or well restriction area (CEAWRA), or active remediation.	Comment acknowledged. Also see response to comment 39. The groundwater PALs are discussed in WS15. No changes needed.
39	MC		WS15		"NJDEP standards will be evaluated concurrently with the ARARs identification process in the FS." Please note that N.J.A.C. 7:26E-4.1 requires delineation to NJ standards during the Remedial Investigation (RI). If NJ standards are not considered during the RI phase, the Department cannot concur on the RI.	Comment acknowledged. In executing the FUDS program, USACE is required by Congress to perform the RI pursuant to CERCLA and the NCP. Compliance with state law and procedures only applies to remedial actions. In accordance with Paragraph 4.3.2.1 of the FUDS Handbook, the Army will initiate coordination with NJDEP regarding ARARs during the RI phase. ARARs and to-be-considered (TBC) criteria will be identified and evaluated in the Feasibility Study (FS). If the RI and risk assessment indicate need for an FS, this document has been prepared in accordance with CERCLA requirements, USACE requirements, and USEPA guidance. No changes needed.
40	MC		WS15		"Although screening levels from USEPA Region 2 are preferred, no relevant ecological screening levels are available for this region. USEPA Headquarters Ecological Soil Screening Levels (EcoSSLs) are the most relevant and were prioritized for soil. For surface water and sediment, USEPA Region 3 screening levels will be prioritized because this region is geographically closest and the basis for development of the values is understood). Region 3 screening levels have been accepted by New York and New Jersey in the past; therefore, the values for Region 3 will be prioritized for surface water and sediment for MRS-02."	See response to Comment 39. There are only two explosives listed in the NJDEP ESC table and they are based on EPA Region 5 screening levels or surface water, sediment and wildlife for 2,4-DNT and nitrobenzene. See response to Comment 39. PALs were based on a hierarchy of EPA sources commonly used in CERCLA risk assessments (EPA Region 3 because it's geographically the closest; EPA region 4 and LANL because they are the most recent). There are only two explosives listed in the NJDEP ESC table and they are based on EPA Region 5 screening levels or surface water, sediment and wildlife for 2,4-DNT and nitrobenzene. Region 5 values are not included in the hierarchy of screening levels presented in QAPP because these values are older (2003) and values from more recent studies are available. NJDEP standards may be considered for inclusion during the identification of ARARs/TBCs during the Feasibility Study (FS) when developing remedial goals. No changes needed.
41	MC		17.2.12	L2836	The NJDEP Field Sampling Procedures Manual, Chapters 3, 5-13 were updated in 2024. Please reference and follow the most recent version of the Manual.	Updated reference in text.
42	MC		17.2.12.2	ISM Soil	N.J.A.C. 7:26E-3.4(a)(2) prohibits the use of composite sampling, which the Incremental Sampling Method (ISM) is a form of. Composite sampling is not permitted for conducting a site investigation nor is it routinely implemented an appropriate or adequate method for conducting a remedial investigation (Technical Guidance for Site Investigation of Soil, Remedial Investigation of Soil, and Remedial Action Verification Sampling for Soil 5.4.1.).	NJAC 7:26E-3.4(a)(2) indicates that "composite soil sampling shall not be used for site investigation sample collection". However, this study is a Remedial Investigation (RI) under CERCLA. Use of ISM in RI sampling is recognized as an appropriate sampling method by USEPA (for example, Incremental Sampling Methodology (ISM) at Polychlorinated Biphenyl (PCB) Cleanup Sites, August 8, 2019). In addition, Section 5.4.1 of the Technical Guidance states the following: "For the purposes of an RI, the Department does not typically accept this approach as it does not indicate spatial or temporal variability in contaminant concentrations. However, the Interstate Technology and Regulatory Council's (ITRC) Incremental Sampling Methodology Team has developed a modified approach, called Incremental Sampling Methodology (ISM). This sampling approach may be acceptable in certain situations." No changes needed.
43	MC		17.2.12.3	ISM Sediment	Lines 2944-2946 state "An ISM approach is planned for sampling sediment at MRS-02. The DU Depth interval is the land surface to 6 inches (0 to 6 inches bgs)" Per the Ecological Evaluation Technical Guidance (EETG) document, "if historical evidence indicates the potential for contamination to be present at intervals greater than six inches, sampling at depth should also be considered to evaluate potential future risks from the sediments, particularly if future dredging or scouring is likely to occur". Since the discharge is from historic source, the Department recommends sampling at deeper intervals, such as the six to twelve inch below ground surface interval or until the contamination is fully delineated pursuant to N.J.A.C. 7:26E-3.6.	Comment Acknowledged. As presented in Section 11.5.4, sediment sampling would be conducted if there is a surface water feature downgradient from a confirmed MEC source area (i.e., HUA) and an MC release to soil has been confirmed. The MEC source is a one time incident, not a long-term discharge, so significant contamination at deeper intervals (> 6 in bgs) is not anticipated. Additionally, based on USEPA's (2015) "Determination of the Biologically Relevant Sampling Depth for Terrestrial and Aquatic Ecological Risk Assessments" the biotic zone of sediment, using benthic abundance, is typically within the upper 6 inches across various aquatic habitats. This is where the exposure to aquatic receptors will occur. Nevertheless, the option for deeper sampling may be considered, as the QAPP indicates that the results will be evaluated for potential migration pathways to determine if additional sampling is necessary. Also see Response to Comment 39. No text changes needed.
44	MC		17.2.12.4	Surface Water Sampling	Lines 2979-2981 "For Areas where tidal or changing flow direction conditions occur, surface water samples might be collected upstream as well as downstream of the locations where MC are suspected to enter the surface water body" Per section 5.3.2.2 of the EETG, multiple surface water samples are a requirement for sampling in tidal water areas; upstream, downstream, and at the point of discharge in addition to in the surrounding floodplains. Note that co-located sediment samples are also required	Comment Acknowledged. The UFP-QAPP indicates a judgmental sampling approach will be used for surface water sampling, with locations biased upstream/ downstream/at point of discharge from a potential soil source to determine presence/absence of MC in surface water. If MC are present, additional sampling will be recommended to evaluate extent and potential risk. A UFP-QAPP Addendum will be prepared for collection of a statistically robust surface water dataset to evaluate nature and extent of contamination as well as human health and ecological risks to wetlands and species of concern. Also see Response to Comment 39. No text changes needed.
45	MC		17.2.12.4	Surface Water Sampling	Lines 2990-9991 state "surface water samples will be collected using the procedures outlined in Field SOP G-16" Please refer to the N.J.A.C. 7:26E and the NJDEP Field Sampling Procedure Manual (PSPM) to ensure that the collection methods are compliant with the Department's Sampling Requirements	Comment Acknowledged. SOP G-16 was reviewed and confirmed to be substantially compliant with N.J.A.C. 7:26E and NJDEP Field Sampling Procedure Manual (PSPM) guidance.
46	MC		Section 10.4	Metals Constituents	Lines 767-769 state "The Munitions listed in Tables 10-1 and 10-2 are not expected to be a source of hazardous metals, including arsenic," and lines 772 through 774 state "Section G-1.b. in Appendix G of EM 200-1-15 states "...analysis for mercury cannot be used to infer the presence or absence of mercury fulminate" therefore, MC Metals will not be analyzed for in any sampling media" The department recommends sampling for metals since there are potential exposure routes in soil, sediment, and surface water for both human health and ecological receptors as noted in Section 10.5.3 of the QAPP.	Comment Acknowledged. While there are potential exposure routes in soil, sediment, and surface water, CERCLA hazardous metals, including mercury, are not expected at the site based on the MC metals (Table G-9 in EM 200-1-15 [2024]) associated with the munitions known to have been at the depot (Tables 10-1 and 10-2).
47	MC		WS 15		Lines 1872-1875 states "Tables 15-1 through 15-4 include human health and ecological screening criteria, PALs, LOCs, detection limits and QSM 5.4 LCS limits, where applicable for each target analyte in a chemical group and media" These tables were not provided in this document. While the Department may not have specific standards for the analytes in questions, it is necessary to review the proposed screening criteria for both human health and ecological receptors, in addition to the justification behind their selection, to determine if the remedial investigation will be completed pursuant to the Technical Rules (N.J.A.C. 7:26E). Please provide these tables for review	Comment Acknowledged. While the numerical tables were missing, the justification for selection of human health and ecological PALs is provided in WS 15 for each environmental medium. The PALs presented in the UFP-QAPP are primarily used to ensure that the analytical method will achieve DOCs. As indicated in the RAWP, the most recent RSLs will be updated to most recent values during preparation of the RI. Also see Response to Comment 39.
48	MEC					NJDEP 5/20/25 letter "MEC Review of the Intrusive Operations/Exclusion Zones (EZ) Meeting" was not addressed in this QAPP.