

Appendix G

Response to Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
- REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 27, 2007

Mr. Stan Cook
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Re: Draft Addendum to Final OE-15SEA.1-4 Site Specific Work Plan, Phase II Seaside Munitions Response Area (MRA) Removal Action, Former Fort Ord, California, dated October 31, 2007

Dear Stan:

Attached are EPA comments on the Draft Addendum to Final OE-15SEA.1-4 Site Specific Work Plan, Phase II Seaside Munitions Response Area (MRA) Removal Action, Former Fort Ord, California, dated October 31, 2007.

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Judy C. Huang".

Judy C. Huang
Remedial Project Manager

Attachment: Munitions Response Terminology Memo. Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health), April 21, 2005

cc:

Dan Ward (DTSC)
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Mr. Thomas Hall (via E-mail)

**REVIEW OF THE
DRAFT ADDENDUM
TO THE
FINAL OE-15SEA.1-4 SITE SPECIFIC WORK PLAN
SEASIDE MUNITIONS RESPONSE AREA (MRS-15SEA.1-4)
FORMER FORT ORD, CALIFORNIA
OCTOBER 31, 2007**

GENERAL COMMENTS

1. The Draft Addendum to the Final OE-15SEA.1-4 Site Specific Work Plan, Seaside Munitions Response Area (MRS-15SEA.1-4), dated October 31, 2007, (hereinafter referred to as the "Draft Seaside WP Addendum"), is a significantly improved document when compared with the previous draft. All of the October 5, 2007, EPA comments have been addressed, with the exception of Specific Comment 8. That comment and the Fort Ord Reuse Authority (FORA) response are provided below:

Specific Comment #8:

Section 6.4, Field Activities, Page 25: This section contains a statement that reads, "Except for low risk MEC escort activities, only essential personnel will be allowed in the work zone." No provision appears to have been made for authorized visitors who need access to the site during the conduct of MEC operations to successfully perform their assigned duties. This seems to be in opposition to the intent of Sections 13 and 14 of EP 385-1-95a (Basic Safety Concepts and Considerations for Munitions and Explosives of Concern Response Action Operations), which allow authorized visitors to be present during MEC operations. Please explain how the regulatory agencies will be able to perform their oversight functions during MEC operations in compliance with this section as it is currently written, or revise the section to allow such access and observation.

Response to Specific Comment #8:

The following sentence is included at Section 6.9: "Representatives from regulatory agencies are permitted to enter the site at any time during business hours or any other reasonable times with an escort." This will allow regulatory agencies to perform their oversight functions during MEC operations.

While the response provided above is acceptable, the implementation thereof in the third paragraph of Section 6.9, Site Control, is unacceptable as written. Of specific concern is that portion of third paragraph of Section 6.9 that reads, "Representatives from regulatory agencies are permitted to enter the site at any time during business hours or any other reasonable times with an escort. Site controls to ensure their safety are as follows:" This sentence is followed by a series of bullets that are all proper and reasonable, with the exception of the second and third bullets.

The second bullet reads, "Hazardous MEC operations in the EZ cease if non UXO trained personnel are present." This restriction is not found in Sections 13 and 14 of EP 385-1-95a (Basic Safety Concepts and Considerations for Munitions and Explosives of Concern Response Action Operations), which allow authorized visitors to be present during MEC operations with no restriction due to any UXO training, or lack thereof. If this restriction, which is not mandated by the COE, is retained, none of the EPA personnel currently associated with the Former Fort Ord remediation will be able to view MEC operations from within the EZ.

The third bullet reads, "UXO trained personnel must escort all authorized visitors to the site." As UXO Technician I personnel are "UXO trained," this would appear to be a violation of the restriction that only allows personnel in the grade of UXO Technician II or higher (i.e., UXO-Qualified Personnel) to serve as escorts within an exclusion area. (See Paragraph C2.1.3 of Department of Defense Explosives Safety Board Technical Paper [TP] 18, Minimum Qualifications for Unexploded Ordnance [UXO] Technicians and Personnel.)

It was also noted in the latest version of the Draft Seaside WP Addendum that Section 6.4, Field Activities, presents a list of site controls in the subsection entitled "Activity 5: MEC Operations" that differs somewhat in content from that provided in Section 6.9, Site Controls. The reason for these differing requirements is not understood.

Please revise the cited paragraph of Section 6.9 to remove the "UXO trained" qualification as a criterion for observing ongoing MEC related operations, or provide a current regulatory cite that mandates such restrictions. Also, please change the words "UXO trained" to read "UXO-Qualified" in the third bullet of the paragraph. In addition, please explain the reasons for the different access requirements found in Section 6.4 and Section 6.9. If no reasons exist, please revise the two sections as necessary to make them consistent.

2. Some of the Military Munitions Response Program (MMRP) definitions found in the Glossary do not correspond with those promulgated by the April 21, 2005, memorandum from the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health), Subject: Munitions Response Terminology. In some of the definitions, words have been changed, deleted or added. A significant effort has been made to ensure that consistent definitions are used in all MMRP related documents at the Former Fort Ord, and it is necessary that this effort be continued. Please review the MMRP related definitions found in the Glossary and revise any that do not match those found in the cited memorandum, a copy of which is attached for your information.

In addition, the acronym "BATF" is defined in the Glossary as Bureau of Alcohol, Tobacco and Firearms. The official acronym is ATF, with BATFE often used as an unofficial abbreviation in some documents. The correct definition of these acronyms is Bureau of Alcohol, Tobacco, Firearms, and Explosives, as per the name change made by the enactment

of the Homeland Security Act of 2002 on November 25, 2002. Please correct the definition and the acronym as necessary.

SPECIFIC COMMENTS

- 1. Contents, page x:** This last page of the Contents section lists three sections of the document entitled "Tables," "Figures," and "Appendices." No subdivision of these sections is provided on this page. It would assist the reader if each table, figure, and appendix were listed by identification number/letter and if titles were provided under their respective section headings. Please make this change.
- 2. Section 3.7.4, Signage/Placarding, page 21:** This section states that, "Magazines will be placarded in accordance with DOD 4145.26-M and DA PAM 385-64. In most instances, this will require a Fire Division Class 1 for the recovered MEC magazines and a Fire Division Class 3 for the demolition material, excluding detonators, which are Fire Division Class 4." This appears to be somewhat different from the information in Table 4-1, NEW and Hazard Division of Stored Explosives. The table states that the magazine containing the demolition material will contain Detonating Cord, 80 Grain (Hazard Class/Division 1.1D), Shape Charge, 19.5 Grams (Hazard Class/Division 1.4S), and Booster, 1/4 Pound (Class/Division 1.1D). If these three materials are stored together in the demolition material magazine, it should be placarded with the highest hazard Class/Division symbol (i.e., Class/Division 1.1D), which will require a Fire Division Class 1 placard. However, Section 3.7.4 indicates that the placarding usually required for demolition materials is "a Fire Division Class 3." Please review the cited section/table and correct them as needed.



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
INSTALLATIONS AND ENVIRONMENT
110 ARMY PENTAGON
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APR 21 2009

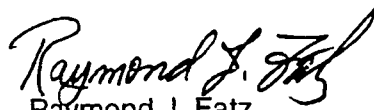
MEMORANDUM FOR THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION
MANAGEMENT

SUBJECT: Munitions Response Terminology

1. This memorandum replaces my October 28, 2003 memorandum, subject: Definitions Related to Munitions Response Terms, and requests your office ensure that the enclosed terms and their definitions (Enclosure 1) are used, when appropriate, in correspondence (e.g., policies, guidance) and briefings concerning the Army's implementations of its Military Munitions Response Program (MMRP), Sustainable Range Management Program (SRMP) and, as appropriate, in other munitions-related matters.
2. In the past three years, the Department of Defense (DoD) has developed policies and guidance to implement its MMRP and SRMP. It has also worked to close a policy gap related to the management of material that may pose explosives hazards to DoD personnel and/or the public. During this period, DoD has been actively engaged, through the Munitions Response Committee (MRC), with the U.S. Environmental Protection Agency, Federal Land Managers, states, and with American Indians and Alaska Natives, to address issues related to the cleanup of munitions response sites.
3. To provide clarity and consistency in these efforts and in internal and external discussions, DoD has been working to establish and use common terms and definitions. The consistent use of accurate, descriptive terms, the definitions of which are commonly understood, is important to our dialogue with environmental regulators and safety officials, stakeholders, and the public.
4. Many of the terms that DoD has adopted for use in addressing munitions-related issues are now codified in Federal statute. On December 14, 2004, the Department of Defense Explosives Safety Board approved revisions to DoD 6055.9-STD, Ammunition and Explosives Safety Standards, using the enclosed terms.
5. The U.S. Army Technical Center for Explosives Safety, in coordination with other agencies, developed the enclosed matrix (Enclosure 2) to help the communities (e.g., operational, explosives safety, logistical, and cleanup) involved in addressing munitions-related operations to better understand how some of the new terms apply to actions they conduct.

6. Use of this terminology does not imply any specific funding authority, nor does it alter the DERP Management Guidance's program eligibility criteria.

7. My staff point of contact is J. C. King at (703) 697-5564 or jc.king@us.army.mil.



Raymond J. Fatz

Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)
OASA(I&E)

Enclosures

cf:

G-3

G-4

DAIM-BD

SFIM-OP

SAGC

OTJAG-ELD

NGB

CEMP-R

USACE

AEC

Enclosure 1: Military Munitions-Related Terms and Definitions

<u>Consolidated Definitions</u>
Anomaly Avoidance. Techniques employed on property known or suspected to contain UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituents in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, to avoid contact with potential surface or subsurface explosive or CA hazards, to allow entry to the area for the performance of required operations.
Chain of Custody. The activities and procedures taken throughout the inspection, re-inspection and documentation process to maintain positive control of MPPEH to ensure the veracity of the process used to determine the status of material as to its explosive hazard. This includes all such activities from the time of collection through final disposition.
Chemical Agent (CA). A chemical compound (to include experimental compounds) that, through its chemical properties produces lethal or other damaging effects on human beings, is intended for use in military operations to kill, seriously injure, or incapacitate persons through its physiological effects. Excluded are research, development, testing and evaluation (RDTE) solutions; riot control agents; chemical defoliants and herbicides; smoke and other obscuration materials; flame and incendiary materials; and industrial chemicals.
Chemical Agent (CA) Hazard. A condition where danger exists because CA is present in a concentration high enough to present potential unacceptable effects (e.g., death, injury, damage) to people, operational capability, or the environment.
Chemical Agent (CA) Safety. A condition where operational capability and readiness, people, property, and the environment are protected from the unacceptable effects or risks of a mishap involving chemical warfare material (CWM) and CA in other than munitions configurations.
Chemical Warfare Material (CWM). Items generally configured as a munition containing a chemical compound that is intended to kill, seriously injure, or incapacitate a person through its physiological effects. CWM includes V- and G-series nerve agents or H-series (mustard) and L-series (lewisite) blister agents in other-than-munition configurations; and certain industrial chemicals (e.g., hydrogen cyanide (AC), cyanogen chloride (CK), or carbonyl dichloride (called phosgene or CG)) configured as a military munition. Due to their hazards, prevalence, and military-unique application, chemical agent identification sets (CAIS) are also considered CWM. CWM does not include: riot control devices; chemical defoliants and herbicides; industrial chemicals (e.g., AC, CK, or CG) not configured as a munition; smoke and other obscuration producing items; flame and incendiary producing items; or soil, water, debris or other media contaminated with low concentrations of chemical agents where no CA hazards exist.
Chemical Warfare Material (CWM) Response. Munitions responses and other responses to address the chemical safety; explosives safety, when applicable; human health; or environmental risks presented by CA-filled munitions and CA in other than munitions configurations. (See munitions response.)
Construction Support. Assistance provided by DoD EOD or UXO-qualified personnel and/or by personnel trained and qualified for operations involving CA, regardless of configuration, during intrusive construction activities on property known or suspected to contain UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituents in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, to ensure the safety of personnel or resources from any potential explosive or CA hazards.
Cultural Debris. Debris found on operational ranges or munitions response sites, which may be removed to facilitate a range clearance or munitions response, that is not related to munitions or range operations. Such debris includes, but is not limited to: rebar, household items (refrigerators, washing machines, etc.), automobile parts and automobiles that were not associated with range targets, fence posts, and fence wire.
Defense Sites. Locations that are or were owned by, leased to, or otherwise possessed or used by the Department of Defense. The term does not include any operational range, operating storage or manufacturing facility, or facility that is used for or was permitted for the treatment or disposal of military munitions. (10 U.S.C. 2710(e)(1))
Discarded Military Munitions (DMM). Military munitions that have been abandoned without proper disposal or removed from storage in a military magazine or other storage area for the purpose of disposal. The term does not include unexploded ordnance, military munitions that are being held for future use or planned disposal, or military munitions that have been properly disposed of, consistent with applicable environmental laws and regulations. (10 U.S.C. 2710(e)(2))
Disposal. End of life tasks or actions for residual materials resulting from demilitarization or disposition operations.
Disposition. The process of reusing, recycling, converting, redistributing, transferring, donating, selling, demilitarizing, treating, destroying, or fulfilling other life-cycle guidance, for DoD property.

Enclosure 1: Military Munitions-Related Terms and Definitions

<p>Documentation of the Explosives Safety Status of Material. Documentation attesting that material: (1) does not present an explosive hazard and is consequently safe for unrestricted transfer within or release from DoD control, or (2) is MPPEH, with the known or suspected explosive hazards stated, that is only transferable or releasable to a qualified receiver. This documentation must be signed by a technically qualified individual with direct knowledge of: (1) the results of both the material's 100 percent inspection and 100 percent re-inspection or of the approved process used and the appropriate level of re-inspection, and (2) the veracity of the chain-of-custody for the material. This signature is followed by the signature of another technically qualified individual who inspects the material on a sampling basis (sampling procedures are determined by DoD entity that is inspecting the material).</p>
<p>Environmental Regulators and Safety Officials. Include, but may not be limited to environmental regulators, environmental coordinators or hazardous material coordinators, law enforcement officers, and safety personnel of the U.S. Environmental Protection Agency (USEPA), American Indians and Alaska Natives, other Federal Land Managers, and/or the States. When appropriate, public health officials of various agencies may also be involved.</p>
<p>Explosive Hazard. A condition where danger exists because explosives are present that may react (e.g., detonate, deflagrate) in a mishap with potential unacceptable effects (e.g., death, injury, damage) to people, property, operational capability, or the environment.</p>
<p>Explosive Ordnance Disposal (EOD). The detection, identification, on-site evaluation, rendering safe, recovery, and final disposal of unexploded ordnance and of other munitions that have become an imposing danger, for example, by damage or deterioration.</p>
<p>Explosive Ordnance Disposal (EOD) Personnel. Military personnel who have graduated from the Naval School, Explosive Ordnance Disposal; are assigned to a military unit with a Service-defined EOD mission; and meet Service and assigned unit requirements to perform EOD duties. EOD personnel have received specialized training to address explosive and certain CA hazards during both peacetime and wartime. EOD personnel are trained and equipped to perform Render Safe Procedures (RSP) on nuclear, biological, chemical, and conventional munitions, and on improvised explosive devices.</p>
<p>Explosive Ordnance Disposal (EOD) Unit. A military organization constituted by proper authority; manned with EOD personnel; outfitted with equipment required to perform EOD functions; and assigned an EOD mission.</p>
<p>Explosives or Munitions Emergency Response. All immediate response activities by an explosives and munitions emergency response specialist to control, mitigate, or eliminate the actual or potential threat encountered during an explosives or munitions emergency. An explosives or munitions emergency response may include in-place render-safe procedures, treatment or destruction of the explosives or munitions, and/or transporting those items to another location to be rendered safe, treated, or destroyed. Any reasonable delay in the completion of an explosives or munitions emergency response caused by a necessary, unforeseen, or uncontrollable circumstance will not terminate the explosives or munitions emergency. Explosives and munitions emergency responses can occur on either public or private lands and are not limited to responses at RCRA facilities. (Military Munitions Rule, 40 CFR 260.10)</p>
<p>Explosives Safety. A condition where operational capability and readiness, people, property, and the environment are protected from the unacceptable effects or risks of potential mishaps involving military munitions.</p>
<p>Interim Holding Facility (IHF). A temporary storage facility designed to hold recovered chemical warfare material (RCWM).</p>
<p>Land Use Controls (LUC). LUC are physical, legal, or administrative mechanisms that restrict the use of, or limit access to, real property, to manage risks to human health and the environment. Physical mechanisms encompass a variety of engineered remedies to contain or reduce contamination and/or physical barriers to limit access to real property, such as fences or signs.</p>
<p>Long-Term Management (LTMgt). The period of site management (including maintenance, monitoring, record keeping, 5-year reviews, etc.) initiated after response (removal or remedial) objectives have been met (i.e., after Response Complete).</p>
<p>Material Potentially Presenting an Explosive Hazard (MPPEH). Material potentially containing explosives or munitions (e.g., munitions containers and packaging material; munitions debris remaining after munitions use, demilitarization, or disposal; and range-related debris); or material potentially containing a high enough concentration of explosives such that the material presents an explosive hazard (e.g., equipment, drainage systems, holding tanks, piping, or ventilation ducts that were associated with munitions production, demilitarization or disposal operations). Excluded from MPPEH are munitions within DoD's established munitions management system and other hazardous items that may present explosion hazards (e.g., gasoline cans, compressed gas cylinders) that are not munitions and are not intended for use as munitions.</p>

Enclosure 1: Military Munitions-Related Terms and Definitions

<p>Military Munitions. Military munitions means all ammunition products and components produced for or used by the armed forces for national defense and security, including ammunition products or components under the control of the Department of Defense, the Coast Guard, the Department of Energy, and the National Guard. The term includes confined gaseous, liquid, and solid propellants; explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries, including bulk explosives, and chemical warfare agents; chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges; and devices and components thereof.</p> <p>The term does not include wholly inert items; improvised explosive devices; and nuclear weapons, nuclear devices, and nuclear components, other than nonnuclear components of nuclear devices that are managed under the nuclear weapons program of the Department of Energy after all required sanitization operations under the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.) have been completed. (10 U.S.C. 101(e)(4)(A) through (C))</p>
<p>Military Munitions Burial Site. A site, regardless of location, where military munitions or CA, regardless of configuration, were intentionally buried, with the intent to abandon or discard. This term includes burial sites used to dispose of military munitions or CA, regardless of configuration, in a manner consistent with applicable environmental laws and regulations or the national practice at the time of burial. It does not include sites where munitions were intentionally covered with earth during authorized destruction by detonation, or where in-situ capping is implemented as an engineered remedy under an authorized response action.</p>
<p>Minimum Separation Distance (MSD). MSD is the distance at which personnel in the open must be from an intentional or unintentional detonation.</p>
<p>Munition with the Greatest Fragmentation Distance (MGFD). The munition with the greatest fragment distance that is reasonably expected (based on research or characterization) to be encountered in any particular area.</p>
<p>Munitions and Explosives of Concern (MEC). This term, which distinguishes specific categories of military munitions that may pose unique explosives safety risks means: (A) Unexploded ordnance (UXO), as defined in 10 U.S.C. 101(e)(5); (B) Discarded military munitions (DMM), as defined in 10 U.S.C. 2710(e)(2); or (C) Munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. 2710(e)(3), present in high enough concentrations to pose an explosive hazard.</p>
<p>Munitions Constituents (MC). Any materials originating from unexploded ordnance (UXO), discarded military munitions (DMM), or other military munitions, including explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions. (10 U.S.C. 2710(e)(3)).</p>
<p>Munitions Debris. Remnants of munitions (e.g., fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal.</p>
<p>Munitions Response. Response actions, including investigation, removal actions and remedial actions to address the explosives safety, human health, or environmental risks presented by unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC), or to support a determination that no removal or remedial action is required.</p>
<p>Munitions Response Area (MRA). Any area on a defense site that is known or suspected to contain UXO, DMM, or MC. Examples include former ranges and munitions burial areas. A munitions response area is comprised of one or more munitions response sites.</p>
<p>Munitions Response Site (MRS). A discrete location within an MRA that is known to require a munitions response.</p>
<p>Mutual Agreement. A meeting of the minds on a specific subject, and a manifestation of intent of the parties to do or refrain from doing some specific act or acts. Inherent in any mutual agreement or collaborative process are the acknowledgement of each member's role in the process and their differing views of their authorities. The mutual agreement process will provide a means of resolving differences without denying the parties an opportunity to exercise their respective authorities should mutual agreement fail to be achieved.</p>
<p>One Percent Lethality Distance. A distance calculated from a given CA Maximum Credible Event (MCE) and meteorological conditions (temperature, wind speed, Pasquill stability factor) and established as the distance at which dosage from that MCE agent release would be 150 mg-min/m³ for H and HD agents, 75 mg-min/m³ for HT agent, 150 mg-min/m³ for Lewisite, 10 mg-min/m³ for GB agent, 4.3 mg-min/m³ for VX vapor, and 0.1 mg-min/m³ for inhalation and deposition of liquid VX.</p>

Enclosure 1: Military Munitions-Related Terms and Definitions

<p>On-call Construction Support. Construction support provided, on an as needed basis, where the probability of encountering UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituents in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, has been determined to be low. This support can respond from off-site when called, or be on-site and available to provide required construction support.</p>
<p>On-site Construction Support. Dedicated construction support, where the probability of encountering UXO, other munitions that may have experienced abnormal environments (e.g., DMM), munitions constituents in high enough concentrations to pose an explosive hazard, or CA, regardless of configuration, has been determined to be moderate to high.</p>
<p>On-the-Surface. A situation in which UXO, DMM or CA, regardless of configuration, are: (A) entirely or partially exposed above the ground surface (i.e., the top of the soil layer); or (B) entirely or partially exposed above the surface of a water body (e.g., because of tidal activity).</p>
<p>Open Burn (OB). An open-air combustion process by which excess, unserviceable, or obsolete munitions are destroyed to eliminate their inherent explosive hazards.</p>
<p>Open Detonation (OD). An open-air process used for the treatment of excess, unserviceable or obsolete munitions whereby an explosive donor charge initiates the munitions being treated.</p>
<p>Operational Range. A range that is under the jurisdiction, custody, or control of the Secretary of Defense and that is used for range activities; or although not currently being used for range activities, that is still considered by the Secretary to be a range and has not been put to a new use that is incompatible with range activities. (10 U.S.C. 101(e)(3)(A) and (B)). Also includes "military range," "active range," and "inactive range" as those terms are defined in 40 CFR §266.201.</p>
<p>Primary Explosives. Primary explosives are highly sensitive compounds that are typically used in detonators and primers. A reaction is easily triggered by heat, spark, impact or friction. Examples of primary explosives are lead azide and mercury fulminate.</p>
<p>Public Access Exclusion Distance (PAED). The PAED is defined as longest distance of the hazardous fragment distance, inhabited building distance (IBD) for overpressure, or the One Percent Lethality Distance. For siting purposes, the PAED is analogous to the IBD for explosives; therefore, personnel not directly associated with the chemical operations are not to be allowed within the PAED.</p>
<p>Qualified Receiver. Entities that have personnel who are, or individuals who are, trained and experienced in the identification and safe handling of used and unused military munitions, and any known or potential explosive hazards that may be associated with the MPPEH they receive; and are licensed and permitted or otherwise qualified to receive, manage, and process MPPEH.</p>
<p>Range. A designated land or water area that is set aside, managed, and used for range activities of the Department of Defense. The term includes firing lines and positions, maneuver areas, firing lanes, test pads, detonation pads, impact areas, electronic scoring sites, buffer zones with restricted access, and exclusionary areas. The term also includes airspace areas designated for military use in accordance with regulations and procedures prescribed by the Administrator of the Federal Aviation Administration. (10 U.S.C. 101(e)(1)(A) and (B))</p>
<p>Range activities. Research, development, testing, and evaluation of military munitions, other ordnance, and weapons systems; and the training of members of the armed forces in the use and handling of military munitions, other ordnance, and weapons systems. (10 U.S.C. 101(e)(2)(A) and (B))</p>
<p>Range Clearance. The destruction, or removal and proper disposition of used military munitions (e.g., unexploded ordnance (UXO) and munitions debris) and other range-related debris (e.g., target debris, military munitions packaging and crating material) to maintain or enhance operational range safety or prevent the accumulation of such material from impairing or preventing operational range use. "Range clearance" does not include removal, treatment, or remediation of chemical residues or munitions constituents from environmental media, nor actions to address discarded military munitions (e.g., burial pits) on operational ranges.</p>
<p>Range-Related Debris. Debris, other than munitions debris, collected from operational ranges or from former ranges (e.g., target debris, military munitions packaging and crating material).</p>
<p>Recovered Chemical Warfare Material (RCWM). CWM used for its intended purpose or previously disposed of as waste, which has been discovered during a CWM response or by chance (e.g., accidental discovery by a member of the public), that DoD has either secured in place or placed under DoD control, normally in a DDESB-approved storage location or interim holding facility, pending final disposition.</p>

Enclosure 1: Military Munitions-Related Terms and Definitions

<p>Render Safe Procedures (RSP). The portion of EOD procedures that involves the application of special disposal methods or tools to interrupt the functioning or otherwise defeat the firing train of UXO from triggering an unacceptable detonation.</p>
<p>Secondary Explosives. Secondary explosives are generally less sensitive to initiation than primary explosives and are typically used in booster and main charge applications. A severe shock is usually required to trigger a reaction. Examples are TNT, cyclo-1,3,5-trimethylene-2,4,6-trinitramine (RDX or cyclonite), HMX, and tetryl.</p>
<p>Small Arms Ammunition. Ammunition, without projectiles that contain explosives (other than tracers), that is .50 caliber or smaller, or for shotguns.</p>
<p>Team Separation Distance (TSD). The distance that munitions response teams must be separated from each other during munitions response activities involving intrusive operations.</p>
<p>Technical Escort Unit (TEU). A DoD organization manned with specially trained personnel that provide verification, sampling, detection, mitigation, render safe, decontamination, packaging, escort and remediation of chemical, biological and industrial devices or hazardous material.</p>
<p>Technology-aided Surface Removal. A removal of UXO, DMM or CWM on the surface (i.e., the top of the soil layer) only, in which the detection process is primarily performed visually, but is augmented by technology aids (e.g., hand-held magnetometers or metal detectors) because vegetation, the weathering of UXO, DMM or CWM, or other factors make visual detection difficult.</p>
<p>Time Critical Removal Action (TCRA). Removal actions where, based on the site evaluation, a determination is made that a removal is appropriate, and that less than 6 months exists before on-site removal activity must begin. (40 CFR 300.5)</p>
<p>Unexploded Ordnance (UXO). Military munitions that (A) have been primed, fuzed, armed, or otherwise prepared for action; (B) have been fired, dropped, launched, projected, or placed in such a manner as to constitute a hazard to operations, installations, personnel, or material; and (C) remain unexploded whether by malfunction, design, or any other cause. (10 U.S.C. 101(e)(5)(A) through (C))</p>
<p>UXO Technicians. Personnel who are qualified for and filling Department of Labor, Service Contract Act, Directory of Occupations, contractor positions of UXO Technician I, UXO Technician II, and UXO Technician III.</p>
<p>UXO-Qualified Personnel. Personnel who have performed successfully in military EOD positions, or are qualified to perform in the following Department of Labor, Service Contract Act, Directory of Occupations, contractor positions: UXO Technician II, UXO Technician III, UXO Safety Officer, UXO Quality Control Specialist, or Senior UXO Supervisor.</p>
<p>Venting. Exposing any internal cavities of MPPEH, to include training or practice munitions (e.g., concrete bombs), using DDESB- or DoD Component-approved procedures, to confirm that an explosive hazard is not present.</p>

Military Munitions-Related Terms (1)
How do they apply to specific types of material?

Type of Material (These are only examples.)	What is it BEFORE it is inspected for explosives hazards? (2)		What is it AFTER it is inspected for explosive hazards?					
	What is it BEFORE it is inspected? (16)		If it presents an explosive hazards?			If it does not present an explosive hazards?		
	MPPEH	Other	MEC			MC (5)	Munitions Debris	Other
			UXO	DMM (3)	MC (4)			
Used military munition, on a range, fired	X		X				X	
Unused military munition, on a range, apparently discarded	X			X			X	
Used military munition, in a burial pit, on an operational range or on former ranges	X		X (6)				X	
Unused military munition, in a burial pit on an operational range or on former ranges	X			X (6)			X	
Explosives in the soil	X				X (7)	X		
Refrigerator, nails, soft drink cans, old fence wire, etc.		(8)	NA	NA	NA			(8)
Used cartridge cases, from a range, with live unused munitions possibly mixed in	X			X			(9)	
Target from a range (other than small arms range)	X		(10)	(10)	(10)			(11)
Remnants of munitions from an operational range or former range	X		X (12)	X (12)	X (12)		X (13)	
Kicked out military munition from a former open burn or open detonation ground	X			X (14)			X	
Residual MC in a melt kettle of a former (closed) explosive cast loading building	X		(15)	(15)	X (15)	X		X (16)
Residual MC in a floor drain pipe from an explosives-laden wash water drain of a former (closed) explosives cast loading facility.	X		(15)	(15)	X (15)			X (16)
Residual MC in cracks in floor slab (and in soil underneath floor cracks) in a former explosives manufacturing building	X		(15)	(15)	X (15)	X		X (16)
Small arms bullets or lead particulates in the soil from small arms use at a former small arms range used only for firing small arms ammunition		X (17)	Not Applicable (17)			X		

Note: The examples in this table are not all inclusive. The numbers in the table refer to footnotes that are found on the next page. It is important to read the footnotes, as they provide additional information of importance to understanding.

E.M. 10.10.05 2

Endnotes:

- (1) DoD has been working to standardize terms related to military munitions.
- (2) Before material that is considered MPPEH can be either transferred within or released from DoD, its explosives safety status must be determined (see definition--Documentation of the Explosives Safety Status of Material). The type material involved determines the type of inspection (e.g., visual examination, chemical analysis, X-ray) required. Personnel qualified to determine the status of the particular material being examined must perform required inspections. For example, EOD and UXO-qualified personnel may inspect UXO and DMM during a munitions response or during range clearance activities. A QASAS or certified Wage Grade ammunition operator may inspect steamed-out projectiles at a depot's steam-out operation. A laboratory technician may perform a chemical analysis of soil to determine the percent explosives in the soil.
- (3) Munitions generally considered as DMM include: buried munitions; un-recovered kick outs from open detonations; munitions left behind or discarded accidentally during munitions-related activities; munitions intentionally disposed of without authorization during munitions-related activities. Munitions removed from storage for the purpose of disposal that are awaiting disposal are not DMM.
- (4) This is MC that is both (a) an explosive; and (b) present in sufficient concentrations to present explosive hazards.
- (5) This is MC that is either (a) not an explosive (e.g., lead, beryllium, and cadmium); or (b) an explosive not present in sufficient concentrations to present explosive hazards.
- (6) Although military munitions in a burial pit will normally be DMM, some may be UXO. For explosives safety reasons, munitions in a burial pit should be approached as UXO until assessed by technically qualified personnel (e.g., EOD personnel, UXO-qualified personnel) and determined that they are not UXO or that they do not present explosive hazards similar to UXO.
- (7) Explosive soil is typically found in sumps and settling lagoons for explosives-laden wastewater, and in and around drainage ditches and pipes that carry the wastewater to such sumps and lagoons.
- (8) These items are cultural debris.
- (9) After determination of their explosives safety status, used cartridge cases documented as safe would, after any demilitarization required to remove their military characteristics, be available for release from DoD. In addition to these DoD requirements, other regulatory criteria may apply.
- (10) A target is a type of range-related debris. Although a target is not MEC, it may contain UXO, DMM, or MC. Prior to its release from DoD control, its explosives safety status must be documented.

- (11) A target's explosives safety status must be documented and any demilitarization required to remove its military characteristics must be performed prior to its release from DoD control.
- (12) UXO, DMM, or MC may be found on operational ranges and on former ranges (previously referred to as closed, transferring or transferred ranges). An inspection of the material will determine into which category this material falls. For example, if a projectile breaks apart on impact, one could find (a) a sheared-off fuze, which would be UXO or (b) explosive filler, which would be MC, that broke away from the projectile's open body. If during an open detonation of an unserviceable munition that is conducted on an operational range, the donor charge detonates, but the munition being destroyed breaks up, but does not detonate, the remnants of the munition would be DMM or, if explosive residue (e.g., clumps of TNT), MC.
- (13) After determination of its explosives safety status, scrap metal from used munitions on a range that is documented as safe would, after any demilitarization required to remove its military characteristics, be available for release from DoD control. In addition to these DoD requirements, other regulatory criteria may apply.
- (14) Prudent safety practice is to consider kick outs, which have experienced an unknown environment, to be equally dangerous and managed like UXO until technically qualified personnel assess and determine that they are not UXO or do not present explosive hazards similar to UXO.
- (15) Of itself, such material (e.g., mettle kettle, drainpipes, floor slabs) do not present an explosive hazard and would not be classified as UXO, DMM or MC. However, residual MC (e.g., TNT, RDX, HMX) could remain in such material in high enough concentrations to present an explosive hazard.
- (16) After determination of its explosives safety status, such material (e.g., mettle kettle, drainpipes, floor slabs) when documented as safe would be available for release from DoD control. In addition to this DoD requirement, other regulatory criteria may apply.
- (17) At operational ranges or former ranges used exclusively for live fire of small arms ammunition, some unfired small arms ammunition may be found. Although this ammunition is considered DMM and would be MPPEH, it is not considered to present a significant explosive hazard.

ESCA Document control

From: Jeff Swanson [jswanson@westcliffe-engineers.com]
Sent: Wednesday, April 16, 2008 9:52 AM
To: Spill, Chris; ESCA Document control
Subject: FW: Roman's DTSC comments on the Seaside Site Specific Work Plan Amendment.

Attachments: FORA 120307 Findings.doc



FORA 120307
Findings.doc (223 ...)

-----Original Message-----

From: Stan Cook [mailto:stan@fora.org]
Sent: Tuesday, December 11, 2007 3:52 PM
To: Reimer, Kristie; Temple, Linda; Laura Baldwin; Aimee Houghton; jswanson@westcliffe-engineers.com; Alexander, Lindsay
Subject: Roman's DTSC comments on the Seaside Site Specific Work Plan Amendment.

-----Original Message-----

From: Roman Racca [mailto:RRacca@dtsc.ca.gov]
Sent: Tuesday, December 11, 2007 1:37 PM
To: Stan Cook
Cc: Judy Huang
Subject: Re: Can you share the status of the DTSC comments on the Seaside Site Specific Work Plan Amendment D

Stan,

Given the computer problems this morning, I am forwarding the comments provided in a memorandum to me from EcoMunitions, for discussion today. EcoMunitions provided the comments to me as focus points and as such may need additional clarification in today's call. I have some general comments that will be forwarded in an official transmittal. The comments following can be discussions points for today.

In general the document is an improvement from the previous version; however, there are a number of typographical errors and vague statements that should not remain in a draft final version. Corrections will need to be incorporated before document finalization.

1. The Acronym List should be checked for correctness such as AOC is listed as Order on Consent. The correct reference is Administrative Order on Consent. CHOMP does not stand for Code of Federal Regulations and should read Community Hospital of Monterey Peninsula. Is the reference to FLD correct?
2. Include a definition of SCA's (Special Case Areas) in the Glossary.
3. Section 2.2.2 Roadway Alignment. Reference the plate as to the location of this area (Plate 1-2) of Figures.
4. Section 2.3.7 last paragraph states that FORA will provide independent Quality Assurance of MEC removal action processes and products. This appears to be an afterthought statement and does not provide the details, methods or assurances as to what these procedure entails. Regulatory agencies were concerned that the QA work would be accomplished by the same contractor that is also validating the QC work, which infer a conflict of interest. The QA process has been the subject of regulatory concern and field work should not begin until this concern is resolved satisfactory. Please provide this information regarding the FORA QA prior to conducting the field work.
5. Section 3.8.5 states that remaining explosives remaining will be abandoned by detonation at project completion. This would not be allowed

by DTSC, since this constitutes the generation of hazardous waste.
Please correct this statement.

6. Section 4.3.1 Minimum Separation Distance. This distance is based on what present criteria. The 238 foot distance was recently updated by DOD for fragmentation distance. Please review the basis for this distance and correct. In addition, if MEC is found that is different than previously identified, then a new MSD may need to be calculated.

7. Please include a signature page as to who is responsible for preparation of this document and who ultimately has responsibility for the work.

8. Please include resumes of key personnel that will be implementing the work plan.

Please forward these comments to your contractors.

Thanks.

Roman

Can you share the status of the DTSC comments on the Seaside Site Specific Work Plan Amendment Draft?

Stan

Roman Racca, P.G.
Project Manager
Cal EPA/Department of Toxic Substances Control
Site Mitigation/Office of Military Facilities
8800 Cal Center Drive
Sacramento, CA 95826
Office: 916-255-6407
Cell: 916-203-6124
Fax: 916-255-3734
rracca@dtsc.ca.gov

3 December, 2007

Department of Toxic Substances Control
Office of Military Facilities
Roman Racca, P.G.
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Racca:

Subject: Findings Concerning Final OE-15 SEA.1-4 Site-Specific Work Plan, 31 October 2007

The revised plan dated 31 October 2007, was received and reviewed in hard copy. The plan could be checked against the previous plan for changes.

The following findings were noted when reviewing the subject work plan:

A signature page identifying responsible parties was not observed. Additionally, resumes of key personnel were not observed in the plan.

2.3.5.3 Near-Surface Anomalies, Line 4

There should not be any overburden on a near-surface anomaly existing at 0"- 6" bgs.

2.3.6 Quality Control and 2.3.7 Quality Assurance

The quality functions are in ethics conflict when performed within the same organization. Quality Assurance should be an independent entity external to the production company (Weston).

3.8.5 Disposal of Remaining Explosives

This paragraph indicates the intent to abandon explosives and dispose by detonation.

4.3.1 Minimum Separation Distance

What is the basis of the MEC review and resulting 238 foot distance?

11-1 Quality Control Plan Introduction, 3rd paragraph

There is a conflict of interest because UXOQC personnel report directly to the UXOQA Manager.

11.2.2 Authority and Responsibility

QCMs report to corporate QA. All UXOQC personnel report to the Weston QCM and Weston UXOQA Manager on quality matters.

11.3.5 Geophysical Survey Quality Assurance

The QA process presented is not external to the production process and product.

Table 11-2, Page 10, Geophysical QC Steps

Analog QC Surveys are conducted by QC and overseen by UXO QA

Figure 2-2, Organizational Chart

Shows the UXOQC reporting directing to the UXOQA manager. The charts shows several layers of corporate and UXO QC and QA. The chart does not show independent UXO and geophysical QA.

Review of the work plan has raised concern with the viability of the FORA quality program and the ability of FORA and their contractors to effectively manage project quality. The concept of quality presented by the contractor is not defensible by way of reason, conflict of interest, or liability of product. The requirement of Weston UXOQA is excessive and not required. A strong QC function is more important for project success. The FORA 3rd Party QA should be the sole, responsible entity for project Quality Assurance.

Sincerely,



Jeffrey D. Anderson, SUXOS
EcoMunition Corporation



DEPARTMENT OF THE ARMY
FORT ORD OFFICE, ARMY BASE REALIGNMENT AND CLOSURE
P.O. BOX 5008, BUILDING #4463 GIGLING ROAD
MONTEREY, CALIFORNIA 93944-5008

30 November 2007

REPLY TO
ATTENTION OF:

Base Realignment and Closure

Stan Cook
ESCA Remediation Program Manager
Fort Ord Reuse Authority
100 12th Street,
Marina, CA 93933

Subject: Comments to *Draft Addendum to Final OE-15SEA1-4 Site Specific Workplan*, October 31, 2007

Dear Mr. Cook:

Thank you for the opportunity to comment on the subject document. The Army's comments are enclosed. Please note that our comments focused on 'big picture' issues such as compliance with existing Biological Opinions, and consistency with documents previously produced under the Army's cleanup program.

Thank you again for the opportunity to comment on this document, as well as your continuing participation in the environmental cleanup of the former Fort Ord. A copy of this letter will be furnished to US Environmental Protection Agency (Judy Huang) and to California Department of Toxic Substances Control (Roman Racca).

Sincerely,

Gail Youngblood
BRAC Environmental Coordinator
Fort Ord Field Office

Enclosure

DRAFT Addendum to Final OE-15SEA.1-4 Site-Specific Work Plan

Phase II Seaside Munitions Response Area (MRA) Removal Action

Army Comments:

1. Page 7, Section 2.0. The PWP itself cannot be revised since it was finalized long ago. This document should instead identify any changes in procedures, etc., from the PWP.
2. Page 9, Section 2.2.1.7. We believe that latrines were previously investigated by Parsons. Please check administrative record documentation.
3. Page 9, Section 2.2.2. Once SCA's are addressed, the entire road corridor should have little or no munitions / explosive related concerns. Activities that are meant to facilitate roadway construction are not necessarily munitions response/remedial actions. Please describe why this action is needed before the road corridor is "cleared" for construction under AOC. Also, MRS15 SEA 1-4 does not extend west of General Jim Moore Boulevard. Note that there appears to be an internal conflict with the Figure 1-2 and Appendix A. Figure 1-2 correctly defines the boundaries of MRS15 SEA1-4 as along the eastern side of Gen Jim Moore Road, while the maps at Appendix A show the western boundary of the MRS as the parcel boundary, which is not consistent with previously published documents.
4. Page 11, Section 2.3.1.2. Please include these additional standards for fence construction: "The eastern fence will be posted with warning signs consistent with other portions of the Impact Area perimeter fence, and installed with access gates that meet the requirements of the POM FD."
5. Page 13. Please include some additional specifics for soil sifting and UXO safety precautions. As a separate matter, the Fort Ord Reuse Authority is responsible for completing an Explosive Safety Submission and obtaining DDESB approval prior to beginning work. Please provide the Army with a verbal status report on this action.
6. Page 16, Section 2.3.7. The description of QA seems to put QA responsibilities on two entities – WESTON and FORA, but few details are included. We suggest that including additional details, particularly with regards to the role of FORA's independent QA, would make this a stronger document.
7. Page 17, Section 2.4. The Community Safety Plan (Reference 15) itself is considered final. Weston/LFR Team may update the procedures, however. This section notes that updates are at least under consideration, but doesn't describe how/when this task will be done. Is this described elsewhere?
8. Page 29, Section 4.2. FORA/LFR is currently allowed to use the ASP for office use only. Before the ASP magazines are used for explosive storage, FORA/LFR will need to obtain appropriate DDESB approval and a revised Right of Entry from the Army.
9. Page 30, Section 4.3.1. See comment 5. above, reference Explosive Safety Submissions.
10. Page 31, Section 4.4.2. Will ordnance demolitions include Fire Department support and include some notification to the community? According to Army procedures, and while the Army still owns the property, Fire Department Support and Detonation Notifications are to be conducted during Army MEC Actions. This is based on past experience which has shown that demolition operations may result in wildfire risks. We would also recommend that demolition operations be conducted in this manner even after the property transfers to FORA and emergency response becomes the responsibility of the City of Seaside.
11. Pages 70 and 71, Section 6.5.2.3. No fire ants occur at former Fort Ord.

12. Page 75. Section 6.5.2.5. Please see the referenced information that indicates there are no brown recluse spiders at or near our project area.
<http://dermatology.cdlib.org/DOJvol15num2/special/recluse.html>
13. Page 94. Section 6.9. In case of emergency, while the Army owns the property. contact POM FD at 242-7851/7852.
14. Page 94. Section 6.10. Is there a particular reference for the lead management plan? Hazards from lead exposure due to small arms ranges are not expected in the Seaside Parcels since cleanup of the small arms ranges has been completed.
15. Page 96. Section 6.12.3. WestMed is current provider for ambulance services. Also, we suggest identifying another landmark, since the Fort Ord gate no longer exists.
16. Pages 96 and 98. Table 6-7 (Table 6-6?) lists POM FD and POM PD at phone numbers 242-7701/242-7702. Replace with 7851 or 7852 and reference the correct Table number in the text. Note that once the parcels transfer to FORA, the City of Seaside will assume emergency response responsibilities.
17. Page 165. Section 12.2. All vegetation within the Seaside MRS sites was mechanically or manually cut to support the TCRA/Non-TCRA Removal Actions that were conducted by the Army in the late 90's. We suggest revising this to describe the current site conditions and not what was present prior to the previous removal actions.
18. Page 166. Section 12.2.2. This site is also located within the 2 Kilometer range of the California Tiger Salamander (CTS). The CTS is listed as a threatened species and protected by the Endangered Species Act. This paragraph needs to recognize that CTS may occur and therefore the applicable Terms and Conditions of the 2005 Biological Opinion need to be implemented during MEC actions.
19. Page 166. Section 12.2.2. Again, all vegetation within these sites was cut to support the TCRA/Non-TCRA actions conducted by the Army.
20. Page 166. Section 12.2.3. The vegetation is not mid-seral stage since it had been cut in the late 1990's to support the removal actions.
21. Page 166. Section 12.2.4. There are no mature stands of CMC since the area had been cut to support the removal actions.
22. Page 166, section 12.2.4. The HMP species are not the same as SEA.1. The 2 Kilometer range of CTS from the nearest vernal pool only overlaps SEA.1 and therefore CTS are not expected to occur at SEA2 - 4.
23. Page 167, Section 12.3. Replace DENR with the Fort Ord BRAC Office. DENR is no longer involved in the BRAC actions.
24. Page 168, Section 12.3.2.2. Revise the sentence "Relevant conservation measures in the 1999 and 2004 BOs are addressed in the HMP." The 99 - 2005 opinions are not addressed in the HMP since the HMP was published in 1997. The sentence should state that the relevant conservation measures described in the biological opinions will be implemented in addition to the requirements identified in the HMP. There is no 2004 opinion.
25. Page 168. Section 12.3.2.2. Critical Habitat for CCG no longer exists on former Fort Ord. USFWS removed CCG critical habitat at Fort Ord. However, there are known populations at former Fort Ord that need to be managed similar to the populations of sand gilia, Monterey spineflower, and seaside bird's beak. No known populations of CCG occur in the Impact Area.

26. Page 169, Section 12.3.2.3. Not sure why 50% non-invasive cover is the criteria to stop monitoring. Invasive weed control will be a long-term requirement per the HMP/HCP since these are Borderland Parcels. Please remove reference to the 50% criteria since it is not based on the HMP nor biological opinions.
27. Page 173. The Biological Opinions need to be included as references.
28. Figure 1-1 and subsequent figures. There seems to be some inconsistency with the Army's previously produced documentation. The Workplan Addendum defines an MRA, which was not done previously. An MRA consists, by definition, of one or more MRSs, which were defined in previously produced Army documents. Therefore, the western boundary of the MRA is not the same as the property transfer boundary. The MRA should more properly be defined as along the eastern side of General Jim Moore Blvd. and southern side of Eucalyptus Road. The MRA does not extend to the west and north of these roads. There is also an internal inconsistency with the figures/maps themselves with regards to boundaries of the MRSs.
29. Figure 2-2. The Project Organization Chart does not identify Senior UXO Technical Manager, QC Geophysicist, Senior Geophysicist, and Database Manager who have QC roles identified in the Quality Control Plan and related tables.
30. Map A-5. In the pdf version, this map indicates that FORA intends to apply minimum separation distance to the property boundary rather than the MRS boundary, which may result in undue disturbance to residents of Seaside. In the hard copy received at the BRAC office, the minimum separation distance is not included in this map.
31. Appendix C, page 4, Section 2.2.3. Activities involving soil disturbance need MEC avoidance measures or construction support if appropriate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

DCN: 09597-07-800-014

January 7, 2008

Mr. Michael A. Houlemard, Jr.
Executive Officer
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Re: Draft Final Addendum to Final OE-15SEA.1-4 Site Specific Work Plan, Phase II Seaside Munitions Response Area (MRA) Removal Action, Former Fort Ord, California, dated December 21, 2007

Dear Mr. Houlemard:

Attached are EPA comments on the Draft Final Addendum to Final OE-15SEA.1-4 Site Specific Work Plan, Phase II Seaside Munitions Response Area (MRA) Removal Action, Former Fort Ord, California, dated December 21, 2007.

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Judy C. Huang". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Judy C. Huang
Remedial Project Manager

cc:

Dan Ward (DTSC)
Site Mitigation/Office of Military Facilities
8800 Cal Center Drive
Sacramento, CA 95826

Roman Racca (DTSC)
Site Mitigation/Office of Military Facilities
8800 Cal Center Drive
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Kristie Reimer, AICP
Principal Planner
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Mr. Berry P. Steinerg
Kutak Rock LLP
1101 Connecticut Ave. NW, Suite 1000
Washington D.C. 20036

Ms. Gail Youngblood
Fort Ord Base Realignment and Closure Office
P.O. Box 5008
Monterey, CA 93944-5004

Mr. Thomas Hall (via E-mail)

**REVIEW OF THE
DRAFT FINAL ADDENDUM
TO THE
FINAL OE-15SEA.1-4 SITE SPECIFIC WORK PLAN
SEASIDE MUNITIONS RESPONSE AREA (MRS-15SEA.1-4)
FORMER FORT ORD, CALIFORNIA
DECEMBER 21, 2007**

SPECIFIC COMMENTS

1. **Section 2.3.2, SCA Removal and Soil Sifting, page 13:** This section reads as follows:

“The removal of MEC from SCAs may include excavations and sifting of affected soil. A final screen size of 1 inch or smaller will be used for sifting operations. Such operations will be conducted in accordance with HNC-ED-CS-S-96-8 to protect equipment operators from MEC hazards while excavating and sifting material. This directive outlines barricades to be used to protect personnel from blast and fragmentation while operating equipment within an MEC site. The depth of the barricades will be determined by the MEC expected to be encountered in the SCAs.

All mechanized operations will maintain a K24 separation distance between the operator of the equipment, sifting screens, and potential MEC. The maximum fragmentation distance will be maintained between the sifting operations and all nonessential personnel. Soil sifting will begin after approval of the Explosive Safety Submission.”

The first sentence in the second paragraph of this section states that, “All mechanized operations will maintain a K24 separation distance between the operator of the equipment, sifting screens, and potential MEC.” It is unclear as to how this will be accomplished for backhoe operators. For example, if the MEC item of concern is an M43 series 81mm HE mortar, this item will contain approximately 1.3 pounds of explosives filler. This would require that the backhoe operator be separated by a minimum of 26 feet from one of these mortars while it is being excavated.

While this distance can be maintained for the operator(s) of the screening equipment, it appears that it cannot be accomplished for the backhoe operator(s). Please review the cited section and determine if the noted separation distance is to be maintained for all equipment operators or only for the screening equipment personnel. If only the screening equipment personnel require the K24 distance, please revise Section 2.3.2 to reflect this. If it is not the intent, and all equipment operators are to be afforded the K24 distance, please revise Section 2.3.2 to explain how this will be accomplished for personnel excavating MEC with a backhoe.

2. **Table 4-2, Minimum Separation Distance by Area:** Footnote number 4 to this table reads as follows: "To obtain the K328 for intentional detonation, add the donor charge NEW to the NEW of the grenade (determine the TNT equivalent weight of the explosive), multiply by the safety factor of 1.2, obtain the cube root of that product and multiply by 328 to get the actual intentional detonations MSD for intentional detonations." The intent of this footnote is unclear because of the inclusion of the word "grenade" therein. It appears that the word "grenade" should be replaced by the term "MEC item." If this is the case, please make this correction. If not, please explain why the use of the word "grenade" is appropriate.

Also, the footnote ends with, "...the actual intentional detonations MSD for intentional detonations." It appears that there are too many "intentional detonations" in this sentence. Please correct this.

In addition, footnote 4 is not referenced anywhere in the body of the table. Please insert the footnote number "4" at the appropriate location in Table 4-2, or delete it from the list of footnotes.

ESCA Document control

From: Temple, Linda [Linda.Temple@WestonSolutions.com]
Sent: Tuesday, April 15, 2008 5:25 PM
To: ESCA Document control
Subject: FW: DTSC comments on the Draft Final SEA.1-4 SSWP Addendum

-----Original Message-----

From: Stan Cook [mailto:stan@fora.org]
Sent: Monday, January 14, 2008 2:45 PM
To: Roman Racca
Cc: Judy Huang; Reimer, Kristie; Temple, Linda; Laura Baldwin
Subject: RE: DTSC comments on the Draft Final SEA.1-4 SSWP Addendum

Roman,

Thank you for your comments. I will share these with LFR immediately.

Stan

-----Original Message-----

From: Roman Racca [mailto:RRacca@dtsc.ca.gov]
Sent: Monday, January 14, 2008 2:38 PM
To: Stan Cook
Cc: Judy Huang
Subject: DTSC comments on the Draft Final SEA.1-4 SSWP Addendum

Stan,

DTSC has completed review of the Draft Final Addendum to OE-15SEA. 1-4 Site-Specific Work Plan Phase II Seaside MRA and have the following comments for incorporation in the Final version.

General Comments:

1. DTSC provided comments to the draft version of this document and concurs with the revisions provided in the Response to Comments in Appendix G.
2. DTSC was provided revisions (Draft Final-Seaside_Adden-Dec2007-09597.doc) to the Draft Final SSWP on January 9, 2008 at the ESCA RP meeting. The revisions proposed are acceptable.

Specific Comments:

1. Signature Page- Please provide signature page in the Final version that includes Mr. Stan Cook representing FORA.
2. Glossary, Page xx, Small Arms Ammunition. Delete the phrase "Replaces Small Arms" at end of definition. This appears to be a place holder.
3. Section 1.3, Site Location, 2nd paragraph. The first sentence reports that the reuse parcels are USACE. Transfer deeds will generally list these parcels as Army reuse parcels. Please correct if this is the case.
4. Figure 2-2, Project Organization Chart. DTSC has been informed that a Quality Assurance contractor will be hired by the FORA to conduct MEC quality assurance independent of LFR and Weston. Please insert the FORA Quality Assurance contractor in the appropriate location that reflects this project relationship.

A letter transmittal will follow for the administrative record.

Please feel free to call me at 916-255-6407 if you have any questions.

Thank you.

Roman

Roman Racca, P.G.

Project Manager

Cal EPA/Department of Toxic Substances Control Site Mitigation/Office of Military Facilities 8800 Cal Center Drive Sacramento, CA 95826

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DEPARTMENT OF THE ARMY
FORT ORD OFFICE, ARMY BASE REALIGNMENT AND CLOSURE
P.O. BOX 5008, BUILDING #4463 GIGLING ROAD
MONTEREY, CALIFORNIA 93944-5008

ESCA-0050
ESCA AR

REPLY TO
ATTENTION OF

DCN: 09597-07-800-015

Base Realignment and Closure

JAN 10 2008

Stan Cook
ESCA Remediation Program Manager
Fort Ord Reuse Authority
100 12th Street
Marina, CA 93933

Subject: Comments to *Draft Final Addendum to Final OE-15SEA1-4 Site Specific Work Plan*, dated December 21, 2007 (received December 28, 2007)

Thank you for the opportunity to review the subject document, including responses to our comments on the previous version. Several of our comments have been incorporated; however, we find two items still requires your attention.

(1) Page 13, Section 2.3.1.5. The second to the last paragraph of this section references *Administrative Draft Addendum to the General Jim Moore Boulevard/Eucalyptus Road Improvement Project, Environmental Assessment (EA)/Initial Study (IS)*, prepared for FPRA by Pacific Municipal Consultants, June 2007 [Ref 24]. This document has been finalized, therefore, the final, signed version (dated July 2, 2007) of the Addendum should be referenced.

(2) Page 11, Section 2.3.1.2 and response to the Army's comments on page G-7. We appreciate the additional information provided in the draft final version regarding the specification of the fence that will be installed along the eastern perimeter of the sites, to include gates and signs, and your commitment to coordinate the fence and gate requirements with the Presidio of Monterey (POM) Fire Department. However, as previously communicated to you and the LFR Team, the POM Fire Department requires five gates along this stretch of the Blue Line fuelbreak (at entrances to regularly-maintained fuel breaks) for emergency access to and from the Impact Area. These access gates are required for the safety of emergency response personnel who may be working in the Impact Area. Please revise the subject work plan so as to meet this requirement.

In addition, we understand that the minimum separation distances for explosives safety will be updated; therefore, we plan to comment on that information in the next version of the document. Thank you again for the opportunity to review the improved document. A copy of this letter will be furnished to U.S. Environmental Protection Agency (Judy Huang) and California Department of Toxic Substances Control (Roman Racca).

Sincerely,

Gail Youngblood
BRAC Environmental Coordinator
Fort Ord Field Office

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
1	General Comment	Judy Huang, EPA	<p>Comment:</p> <p>Please revise the cited paragraph of Section 6.9 to remove the “UXO trained” qualification as a criterion for observing ongoing MEC related operations, or provide a current regulatory cite that mandates such restrictions. Also, please change the words “UXO trained” to read “UXO-Qualified” in the third bullet of the paragraph. In addition, please explain the reasons for the different access requirements found in Section 6.4 and Section 6.9. If no reasons exist, please revise the two sections as necessary to make them consistent.</p> <p>Response:</p> <p>Pages 93 and 94 of the SSWP Addendum were revised to clarify the intent to allow regulatory representatives access to perform oversight functions. The following sentence is added: "Regulatory agencies will be allowed to perform their oversight functions during MEC operations, and are considered essential personnel" and the subsequent bullet items were deleted, instead referring to Section 6.4, Activity 5: MEC Operations.</p>
2	General Comment, Glossary	Judy Huang, EPA	<p>Comment:</p> <p>Some of the Military Munitions Response Program (MMRP) definitions found in the Glossary do not correspond with those promulgated by the April 21, 2005, memorandum from the Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health), Subject: Munitions Response Terminology. In some of the definitions, words have been changed, deleted or added. A significant effort has been made to ensure that consistent definitions are used in all MMRP related documents at the Former Fort Ord, and it is necessary that this effort be continued. Please review the MMRP related definitions found in the Glossary and revise any that do not match those found in the cited memorandum, a copy of which is attached for your information.</p> <p>In addition, the acronym “BATF” is defined in the Glossary as Bureau of Alcohol, Tobacco and Firearms. The official acronym is ATF, with BATFE often used as an unofficial abbreviation in some documents. The correct definition of these acronyms is Bureau of Alcohol, Tobacco, Firearms, and Explosives, as per the name change made by the enactment of the Homeland Security Act of 2002 on November 25, 2002. Please correct the definition and the acronym as necessary.</p> <p>Response:</p> <p>The Glossary and Acronym list is revised with respect to this comment.</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
			Revisions are related to MMRP definitions and ATF. References to ATF were revised throughout the document on the following pages: 37, 38, 39 (two occurrences), 40, 41 (two occurrences), 44 (two occurrences), 45, 47, 48 (four occurrences), and 143.
1	Contents	Judy Huang, EPA	<p>Comment:</p> <p>Contents, page x: This last page of the Contents section lists three sections of the document entitled “Tables,” “Figures,” and “Appendices.” No subdivision of these sections is provided on this page. It would assist the reader if each table, figure, and appendix were listed by identification number/letter and if titles were provided under their respective section headings. Please make this change.</p> <p>Response:</p> <p>Listings of Tables, Figures, and Appendices have been added to the Contents and include identification numbers/letters and titles.</p>
2	3.7.4	Judy Huang, EPA	<p>Comment:</p> <p>Signage/Placarding, page 21: This section states that, “Magazines will be placarded in accordance with DOD 4145.26-M and DA PAM 385-64. In most instances, this will require a Fire Division Class 1 for the recovered MEC magazines and Fire Division Class 3 for the demolition material, excluding detonators, which are Fire Division Class 4.” This appears to be somewhat different from the information in Table 4-1, NEW and Hazard Division of Stored Explosives. The table states that the magazine containing the demolition material will contain Detonating Cord, 80 Grain (Hazard Class/Division 1.1D), Shape Charge, 19.5 Grams (Hazard Class/Division 1.4S), and Booster, ¼ Pound (Class/Division 1.1D). If these three materials are stored together in the demolition material magazine, it should be placarded with the highest hazard Class/Division symbol (i.e., Class/Division 1.1D), which will require a Fire Division Class 1 placard. However, Section 3.7.4 indicates that the Placarding usually required for demolition materials is “a Fire Division Class 3.” Please review the cited section/table and correct them as needed.</p> <p>Response:</p> <p>Page 22 of the SSWP Addendum is revised to include the following: “The proposed storage configuration for demolition material will require a Fire Division Class 1.”</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
	General Comment	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>In general the document is an improvement from the previous version; however, there are a number of typographical errors and vague statements that should not remain in a draft final version. Corrections will need to be incorporated before document finalization.</p> <p>Response:</p> <p>The document has been reviewed to correct typographical errors and vague statements prior to finalizing.</p>
1	Acronym List	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>The Acronym List should be checked for correctness such as AOC is listed as Order on Consent. The correct reference is Administrative Order on Consent. CHOMP does not stand for Code of Federal Regulations and should read Community Hospital of Monterey Peninsula. Is the reference to FLD correct?</p> <p>Response:</p> <p>The Acronym list has been checked and revised.</p>
2	Glossary	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Include a definition of SCA's (Special Case Areas) in the Glossary.</p> <p>Response:</p> <p>The following definition for Special Case Areas (SCAs) will be added to the Glossary:</p> <p>SCAs were identified by the Army for a variety of reasons, such as dense metallic clutter that prevented digital detection instruments or interference due to nearby metal structure or features. SCAs include historical and current fencing; asphalt/concrete range pads, roads, and walkways; areas under existing structures (i.e., field latrines and range-related structures); berms and culverts; and areas requiring excavation by heavy equipment (i.e., scrape areas).</p>
3	2.2.2	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Roadway Alignment. Reference the plate as to the location of this area (Plate 1-2) of Figures.</p>

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No.	Section / Figure	Comment by	Comment/Response
			<p>Response:</p> <p>A reference to Figure 1-2 was added to the first sentence of Section 2.2.2.</p>
4	2.3.7	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>(Last paragraph) states that FORA will provide independent Quality Assurance of MEC removal action processes and products. This appears to be an afterthought statement and does not provide the details, methods or assurances as to what these procedures entail. Regulatory agencies were concerned that the QA work would be accomplished by the same contractor that is also validating the QC work, which infer a conflict of interest. The QA process has been the subject of regulatory concern and field work should not begin until this concern is resolved satisfactory. Please provide this information regarding the FORA QA prior to conducting the field work.</p> <p>Response:</p> <p>We are in agreement that QA responsibilities need to be defined in detail. As discussed during the December 12, 2007 meeting with regulatory agency representatives, an independent QA program will be prepared and provided to the regulatory agencies for review and approval prior to starting MEC clearance activities related to the SSWP Addendum.</p>
5	3.8.5	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>States that remaining explosives remaining will be abandoned by detonation at project completion. This would not be allowed by DTSC, since this constitutes the generation of hazardous waste. Please correct this statement.</p> <p>Response:</p> <p>The second sentence in Section 3.8.5 was removed and replaced as follows, "Following completion of work in the Seaside MRA, all unused explosives will be retained for usage in subsequent MRAs. Explosives remaining upon completion of all MRAs will be returned to the supplier."</p>
6	4.3.1	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Minimum Separation Distance. This distance is based on what present criteria. The 238 foot distance was recently updated by DOD for fragmentation distance. Please review the basis for this distance and correct. In addition, if MEC is found that is different than previously</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
			<p>identified, then a new MSD may need to be calculated.</p> <p>Response:</p> <p>Minimum Separation Distance is based on Department of Defense Explosives Safety Board's (DDESB's) Technical Paper No. 16, Revision 2, "Methodologies for Calculating Primary Fragment Characteristics," dated October 2005 and the DDESB fragmentation characteristics database which provides revisions to the table in Technical Paper No. 16.</p> <p>The approximate 238 foot distance identified in the SSWP Addendum has been removed and was replaced by Table 4-2, which includes all anticipated MSDs for munitions response sites (MRSs) within the Seaside MRA. If MEC is found that is different than previously identified, then a new MSD will be calculated.</p>
7	Signatory	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Please include a signature page as to who is responsible for preparation of this document and who ultimately has responsibility for the work.</p> <p>Response:</p> <p>A signature page was added to the SSWP Addendum immediately following the cover page to identify individuals responsible for preparing this work plan and implementing the scope of work.</p>
8	Resumes	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Please include resumes of key personnel that will be implementing the work plan.</p> <p>Response:</p> <p>Resumes of key personnel (SUXOS, UXOQCS and UXOSO) have been included as an appendix to the SSWP Addendum.</p>
1	2.0	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The PWP itself cannot be revised since it was finalized long ago. This document should instead identify any changes in procedures, etc., from the PWP.</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
			<p>Response:</p> <p>The third sentence of Section 2.0 was revised as follows: “Updates Revisions to the PWP are included in this SSWP Addendum.”</p>
2	2.2.1.7	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>We believe that latrines were previously investigated by Parsons. Please check administrative record documentation.</p> <p>Response:</p> <p>We recognize that the report summarizing the previously investigation conducted at the field latrines by USA Environmental, Inc. focused on checking the latrine pits with hand-held magnetometers and visual inspection to locate OE and suspect items. Section 2.2.1.7 of this SSWP Addendum is intended to focus on the soil around and beneath the latrines once the latrines and associated foundation have been removed. Therefore, the fourth and fifth sentences of Section 2.2.1.7 were revised as follows:</p> <p>“The latrine pits will be investigated in accordance with the latrine clearance standard operating procedure (SOP) in the PWP [Ref.1, Appendix G]. The uncovered areas and the affected areas around the structures and latrines will be cleared to depth using BADT in accordance with the latrine clearance standard operating procedure (SOP) in the PWP [Ref.1, Appendix G].</p>
3	2.2.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Once SCA's are addressed, the entire road corridor should have little or no munitions response/remedial actions. Please describe why this action is needed before the road corridor is “cleared” for construction under AOC. Also, MRS15 SEA 1-4 does not extend west of General Jim Moore Boulevard. Note that there appears to be an internal conflict with the Figure 1-2 and Appendix A. Figure 1-2 correctly defines the boundaries of MRS15 SEA 1-4 as along the eastern side of Gen Jim Moore Road, while the maps at Appendix A show the western boundary of the MRS as the parcel boundary, which is not consistent with previously published documents.</p> <p>Response:</p> <p>The visual surface inspection for MEC within the roadway alignment will be performed under construction oversight and not as part of a munitions response/remedial action. Section 2.2.2 Roadway Alignment will be changed as follows:</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
			<ul style="list-style-type: none"> • Visual surface inspection for MEC as an extra safety measure within the roadway alignment. • <i>Visual surface inspection for MEC within the roadway alignment will be performed as part of construction oversight.</i> <p>The associated figures in Appendix A have been corrected to clarify the MRS and MRA boundaries. The western boundary of MRS-15SEA.1 and MRS-15SEA.2 do not extend west of General Jim Moore Boulevard as correctly stated in the comment. The western boundaries of the property transfer parcels extend west of General Jim Moore Boulevard and, therefore, have been included as part of the Seaside MRA as required by the FORA ESCA RP.</p>
4	2.3.1.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Please include these additional standards for fence construction: "The eastern fence will be posted with warning signs consistent with other portions of the Impact Area perimeter fence and installed with access gates that meet the requirements of the POM FD."</p> <p>Response:</p> <p>This comment is recognized as a logistical item to be addressed by the appropriate representatives of FORA, the U.S Army, and interested stakeholders, such as the Bureau of Land Management and the POM Fire Department. A final resolution regarding access, fencing, and gates is independent of the scope of this SSWP Addendum.</p> <p>To clarify the fencing requirements, the following will be added to Section 2.3.1.2 Fence Removal and Installation.</p> <p><i>Fencing will be installed along the eastern boundary of the Seaside MRA, 3 feet off the boundary. The fencing specifications are based on Army Specifications for barbed wire fencing (Spec No. 9705, Section 02832). The fencing will include four-strand galvanized barbed wire with posts every 10 feet and pole posts every 500 feet. Appropriate signage will be posted along perimeter fencing. As an additional measure to restrict public access, concertina wire coils will be attached to the barbed wire fencing on the eastern side. To allow for access to the inland range, 25-foot wide swing gates with posts and concertina wire strung on top will also be installed. Gates and perimeter fencing requirements will be coordinated with Presidio of</i></p>

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No.	Section / Figure	Comment by	Comment/Response
			<i>Monterey (POM) Fire Department (FD).</i>
5	2.3.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Please include some additional specifics for soil sifting and UXO safety precautions. As a separate matter, the Fort Ord Reuse Authority is responsible for completing an Explosive Safety Submission and obtaining DDESB approval prior to beginning work. Please provide the Army with a verbal status report on this action.</p> <p>Response:</p> <p>The following sentences were added to this section as additional safety information for soil sifting operations: “All mechanized operations will maintain a K24 separation distance between the operator of the equipment, sifting screens, and potential MEC. The maximum fragmentation distance will be maintained between the sifting operations and all non-essential personnel. <i>Soil sifting will begin after approval of the Explosive Safety Submission.</i>”</p> <p>In addition, a Minimum Separation Distance table is included in the SSWP Addendum as Table 4-2.</p>
6	2.3.7	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The description of QA seems to put QA responsibilities on two entities - WESTON and FORA, but few details are included. We suggest that including additional details, particularly with regards to the role of FORA's independent QA, would make this a stronger document.</p> <p>Response:</p> <p>We are in agreement that QA responsibilities need to be defined in detail. As discussed with the regulatory agency representatives during the December 12, 2007 meeting, an independent QA program will be prepared and provided to the regulatory agencies for review and approval prior to starting MEC clearance activities related to the SSWP Addendum. This information will also be provided to the U.S. Army for review and approval.</p>
7	2.4	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The Community Safety Plan (Reference 15) itself is considered final, Weston/LFR Team may update the procedures, however. This section notes that updates are at least under consideration, but doesn't describe</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
			<p>how/when this task will be done. Is this described elsewhere?</p> <p>Response:</p> <p>The text in Section 2.4 was replaced as follows: “A Community Safety Plan similar to the Army's City of Seaside Community Safety Plan (CSP) [Ref. 15] is being developed and will be implemented when necessary to ensure the safety of the community.”</p>
8	4.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>FORA/LFR is currently allowed to use the ASP for office use only. Before the ASP magazines are used for explosive storage. FORA/LFR will need to obtain appropriate DDESB approval and a revised Right of Entry from the Army.</p> <p>Response:</p> <p>The following sentence was added to Section 4.2, “Use of the explosive storage facility requires prior approval of the Explosive Safety Submission and a Right of Entry agreement from the U.S. Army.”</p>
9	4.3.1	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>See comment 5 above, reference Explosive Safety Submissions.</p> <p>Response:</p> <p>The following sentence was added to Section 4.3.1, “Intrusive MEC removal activities will not be conducted prior to approval of the explosives safety submission.”</p>
10	4.4.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Will ordnance demolitions include Fire Department support and include some notification to the community? According to Army procedures, and while the Army still owns the property. Fire Department Support and Detonation Notifications are to be conducted during Army MEC Actions. This is based on past experience which has shown that demolition operations may result in wildfire risks. We would also recommend that demolition operations be conducted in this manner even after the property transfers to FORA and emergency response becomes the responsibility of the City of Seaside.</p> <p>Response:</p> <p>The following was added to Section 4.4.2 Blow In-Place:</p>

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No.	Section / Figure	Comment by	Comment/Response
			<p><i>Prior to any detonation, the SUXOS will initiate the appropriate notification and approval procedure. The SUXOS will schedule the demolition to allow sufficient time to complete all notifications and approvals.</i></p> <p><i>Notifications and approvals will be conducted as follows:</i></p> <ul style="list-style-type: none"> • <i>Complete the MEC Disposal Checklists and notifications for each disposal operation</i> • <i>Request POMFD to perform an on-site fire risk assessment. For planned detonations, risk assessments require a 3-day notification and demolition shots require a 5-day notification. POMFD will expedite risk assessments for demolition shots that can not be delayed. Following property transfer, requirements for risk assessments will be determined by the City of Seaside Fire Department.</i> • <i>Complete a Detonation Approval Checklist/Risk Assessment and submit to the FORA ESCA RPM for approval.</i> • <i>Coordinate mass detonations with the Federal Aviation Administration (FAA). Mass detonations are not expected for this project. If necessary, the UXOSO will contact FAA for air clearance and will hold on line until the shot is fired.</i>
11	6.5.2.3	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>No fire ants occur at former Fort Ord.</p> <p>Response:</p> <p>Although it is understood that fire ants do not occur at the former Fort Ord, this section will remain as a contingency.</p>
12	6.5.2.5	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Please see the referenced information that indicates there are no brown recluse spiders at or near our project area: http://dermatology.cdlib.org/DOJvol5num2/special/recluse.html</p> <p>Response:</p> <p>Although it is understood that there are no brown recluse at or near the project area, this section will remain as a contingency in case brown recluse enter the area with project facilities. The following sentence</p>

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No.	Section / Figure	Comment by	Comment/Response
			<p>has been added to Section 6.5.2.5 to address this comment:</p> <p>“The brown recluse spider has not been reported at or near the project area [Ref. 25].”</p> <p>The following reference has been added to the reference section in support of this response:</p> <p style="padding-left: 40px;">25. Identifying and Misidentifying the Brown Recluse Spider, <i>Dermatology Online Journal</i> 5(2):7, http://dermatology.cdlib.org/DOJvol5num2/special/recluse.html (accessed 12/3/07), Vetter, Rick, 1999</p>
13	6.9	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>In case of emergency, while the Army owns the property contact POM FD at 242-7851/7852.</p> <p>Response:</p> <p>The requested comment has been incorporated as follows:</p> <p>“If the emergency warrants site evacuation the UXOSO or SUXOS will notify the Presidio of Monterey (POM) Police Department <i>Fire Department</i> and the proper authorities.”</p> <p>In addition, the telephone number for the POM Fire Department has been corrected in Table 6-6.</p>
14	6.10.0	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Is there a particular reference for the lead management plan? Hazards from lead exposure due to small arms ranges are not expected in the Seaside Parcels since cleanup of the small arms ranges has been completed.</p> <p>Response:</p> <p>In response to this comment, the following sentence was deleted from Section 6.10 since suspected lead hazards are not anticipated during MEC clearance activities:</p> <p>“However, entry into sites with suspected lead hazards will require decontamination per procedures defined in the Lead Management Plan.”</p>

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No.	Section / Figure	Comment by	Comment/Response
15	6.12.3	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>WestMed is current provider for ambulance services. Also, we suggest identifying another landmark, since the Fort Ord gate no longer exists.</p> <p>Response:</p> <p>"American Medical Response" was replaced with "WestMed" in Section 6.12.3. The "Fort Ord gate" was replaced with "corner of General Jim Moore Boulevard and Eucalyptus Road".</p>
16		Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Table 6-7 (Table 6-6?) lists POM FD and POM PD at phone numbers 242-7701/242-7702. Replace with 7851 or 7852 and reference the correct Table number in the text. Note that once the parcels transfer to FORA, the City of Seaside will assume emergency response responsibilities.</p> <p>Response:</p> <p>The following sentence was added to Section 6.9, "After property transfer the UXOSO or SUXOS will notify the Seaside Fire Department, who will assume emergency response responsibility."</p> <p>The reference to Table 6-7 was change to "Table 6-6" in Section 6.12.4 on Page 96.</p> <p>Table 6-6 was revised to include Seaside Police and Fire Departments and to include the correct telephone numbers for POM Fire Department.</p>
17	12.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>All vegetation within the Seaside MRS sites was mechanically or manually cut to support the TCRA/Non-TCRA Removal Actions that were conducted by the Army in the late 90's. We suggest revising this to describe the current site conditions and not what was present prior to the previous removal actions.</p> <p>Response:</p> <p>The requested correction to describe the current site vegetation has been incorporated into Section 12.2 to describe the current site</p>

Response to Comments on the DRAFT SSWP Addendum

No.	Section / Figure	Comment by	Comment/Response
			<p>vegetation:</p> <p>“The Seaside MRA (MRS-15 SEA 1–4) is located in the southwestern portions of the former Fort Ord, and fall within the borderland development areas along the natural resources management area (NRMA) interface, as designated in the HMP. The four sites within the MRA form a contiguous narrow parcel along the west and north boundaries of the NRMA, ranging from the north boundary of the City of Del Rey Oaks, along General Jim Moore Boulevard and Eucalyptus Road on the north edge of the NRMA. The sites are dominated by maritime chaparral. All vegetation within the MRSs of the Seaside MRA was mechanically or manually cut to support the TCRA and NTCRA that were conducted by the Army in the late 90’s. Wetland or vernal pond areas are not present at any of the sites. Descriptions of the natural resources on the sites—including specific vegetation types and species listed in the HMP as rare, threatened, or endangered—are provided below.”</p>
18	12.2.1	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>This site is also located within the 2 Kilometer range of the California Tiger Salamander (CTS). The CTS is listed as a threatened species and protected by the Endangered Species Act of the 2005 Biological Opinion need to be implemented during MEC actions.</p> <p>Response:</p> <p>The requested correction identified in Comment No. 17 above has been incorporated into to Section 12.2.1 as follows:</p> <p>“The MRS-15SEA.1 site is approximately 198 acres and extends from the north boundary of MRS-15SEA.1 north to Broadway Road. The vegetation type in MRS-15SEA.1 is a mixture of mature and mid-seral stage maritime chaparral that is dominated by shaggy bark manzanita in the southern half of the site and sandmat manzanita in the northern half. Coast live oaks stands are scattered throughout MRS-15SEA.1. All vegetation within the MRSs of the Seaside MRA was mechanically or manually cut to support the TCRA and NTCRA that were conducted by the Army in the late 90’s. The current vegetation may include early seral stages of maritime chaparral. The topography of the site is flat to gently rolling terrain. HMP listed plant species include Monterey spineflower, sand gilia, seaside birdsbeak, sandmat manzanita, Monterey ceanothus, and low densities of Eastwood’s golden fleece. The site is likely to include occupied habitat for the black legless</p>

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			<p>lizard, even though the estimated population of this area is unknown.”</p> <p>In addition, the following sentence has been added as the last sentence of Section 12.2.1 to address the habitat of the California Tiger Salamander (CTS) as follows:</p> <p><i>“This MRS is located within 1 to 2 kilometers (km) of a known or potential breeding habitat of the California Tiger Salamander (CTS). The CTS is listed as a threatened species under the Endangered Species Act. Therefore, CTS may occur and the applicable Terms and Conditions of the 2005 Biological Opinion will be implemented during MEC removal actions (see Section 12.3.2.2 below).”</i></p>
19	12.2.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Again, all vegetation within these sites was cut to support the TCRA/Non-TCRA actions conducted by the Army.</p> <p>Response:</p> <p>The requested correction to Section 12.2.2 has been incorporated as follows:</p> <p><i>“The MRS-15SEA.2 site is approximately 97 acres and extends from Broadway Road north to the corner of Eucalyptus Road and General Jim Moore Boulevard. The vegetation type is similar to the vegetation type described in MRS-15SEA.1, except sandmat manzanita dominates the southern half of the site and shaggy bark manzanita dominates the northern half. Coast live oaks stands are scattered throughout MRS-15SEA.2. All vegetation within the MRSs of the Seaside MRA was mechanically or manually cut to support the TCRA and NTCRA that were conducted by the Army in the late 90's. The current vegetation may include early seral stages of maritime chaparral. The topography of the site is flat or gentle to moderately rolling terrain. HMP listed species include Monterey spineflower, sandmat manzanita, Monterey ceanothus, and low densities of Eastwood's golden fleece. The site is likely to include occupied habitat for the black legless lizard, even though the estimated population of for this area is unknown.”</i></p>
20	12.2.3	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The vegetation is not mid-seral stage since it had been cut in the late 1990's to support the removal actions.</p> <p>Response:</p> <p>The requested correction to Section 12.2.3 has been incorporated as</p>

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			<p>follows:</p> <p>“The MRS-15SEA.3 site is approximately 48 acres and is located at the corner of Eucalyptus Road and General Jim Moore Boulevard. Vegetation is mid-seral stage maritime chaparral that is dominated by shaggy bark manzanita. A stand of coast live oaks located in the northwest corner comprises approximately 15 percent of the site, and individual oaks are scattered throughout the site. All vegetation within the MRSs of the Seaside MRA was mechanically or manually cut to support the TCRA and NTCRA that were conducted by the Army in the late 90's. The current vegetation may include early seral stages of maritime chaparral. The terrain is flat to gently rolling. The HMP-listed species present are the same as those described for MRS-15SEA.1 and MRS-15SEA.2.”</p>
21	12.2.4	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>There are no mature stands of CMC since the area had been cut to support the removal actions.</p> <p>Response:</p> <p>The requested correction to Section 12.2.4 has been incorporated as follows:</p> <p>“The MRS-15SEA.4 is approximately 76 acres and extends from MRS-15SEA.3 to slightly past the eastern edge of Range 46. The site is comprised of approximately 50 percent coast live oak woodland, and 50 percent maritime chaparral that varies from dense mature stands to mid-seral stage stands. All vegetation within the MRSs of the Seaside MRA was mechanically or manually cut to support the TCRA and NTCRA that were conducted by the Army in the late 90's. The current vegetation may include early seral stages of maritime chaparral. The terrain is gentle rolling. The HMP-listed species present are the same as those described for MRS-15SEA.1 and MRS-15SEA.2.”</p>
22	12.2.4	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The HMP species are not the same as SEA.1. The 2 Kilometer range of CTS from the nearest vernal pool only overlaps SEA.1 and therefore CTS are not expected to occur at SEA2-4.</p> <p>Response:</p> <p>The following sentence was deleted from Section 12.2.4 in response to the requested correction:</p>

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			<p>“The HMP-listed species present are the same as those described for MRS-15 SEA.1 and MRS-15 SEA 2.”</p>
23	12.3	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Replace DENR with the Fort Ord BRAC Office. DENR is no longer involved in the BRAC actions.</p> <p>Response:</p> <p>The requested correction has been completed. DENR was replaced with Fort Ord BRAC.</p> <p>“The LFR Team will coordinate with the Directorate of Environmental and Natural Resources (DENR) Fort Ord BRAC Office as needed on environmental issues that are not addressed in the HMP.”</p>
24	12.3.2.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Revise the sentence "Relevant conservation measures in the 1999 and 2004 BOs are addressed in the HMP." The 99-2005 opinions are not addressed in the HMP since the HMP was published in 1997. The sentence should state that the relevant conservation measures described in the biological opinions will be implemented in addition to the requirements identified in the HMP. There is no 2004 opinion.</p> <p>Response:</p> <p>The requested correction to Section 12.3.2.2 has been incorporated as follows:</p> <p>“The mitigation measures listed in Chapter 3 of the HMP for “Ordnance and Explosives Removal” <i>are not required for development parcels. Most of the parcels within the Seaside MRA are designated for development, which do not require HMP mitigation. However, because the eastern boundary of the Seaside MRA is identified as ‘borderlands,’ mitigation measures as identified in Chapter 4 of the HMP will be implemented. will be implemented for relevant activities in this SSWP. The general mitigation measures listed are:</i></p> <ul style="list-style-type: none"> ● removal sites will be restricted to the smallest area possible ● where feasible, populations of sand gilia will be avoided ● removal will be coordinated with the burning and

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			<p style="text-align: center;">restoration program when feasible</p> <ul style="list-style-type: none"> • an employee education program will be conducted • vernal pools and ponds will be avoided whenever possible • the black legless lizard protocol will be implemented if animals are encountered <p>Since the HMP was developed, additional biological opinions potentially relevant to this SSWP have been issued by FWS [Ref. 26, 27, and 28] (FWS 1999, 2002, 2005). Relevant conservation measures in the 1999 and 2004 BOs are addressed in the HMP. Relevant mitigation measures from <i>these</i> the 2005 BOs not included in the HMP will be implemented as part of this SSWP as summarized below.”</p>
25	12.3.2.2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Critical Habitat for CCG no longer exists on former Fort Ord. USFWS removed CCG critical habitat at Fort Ord. However, there are known populations at former Fort Ord that need to be managed similar to the populations of sand gilia. Monterey spineflower and seaside bird's beak. No known populations of CCG occur in the Impact Area.</p> <p>Response:</p> <p>The following subsection entitled “Contra Costa Goldfields Critical Habitat Mitigation Measures” was deleted from Section 12.3.2.2 in response to the requested correction.</p>
26	12.3.2.3	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Not sure why 50% non-invasive cover is the criteria to stop monitoring. Invasive weed control will be a long-term requirement per the HMP/HCP since these are Borderland Parcels. Please remove reference to the 50% criteria since it is not based on the HMP or biological opinions.</p> <p>Response:</p> <p>The requested correction has been incorporated as follows:</p> <p>“Areas will be monitored at least once per year for five years, but monitoring will be terminated sooner if either of the following conditions occur: a) development construction begins or b) an area exhibits more than 50 percent projected cover of non- (invasive weed) vegetation in the area.”</p>

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27	14.0	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The Biological Opinions need to be included as references.</p> <p>Response:</p> <p>The requested Biological Opinions have been incorporated into Section 12, Environmental Protection Plan, as appropriate, and into the reference section as follows:</p> <ul style="list-style-type: none"> 26. Biological and Conference Opinion on the Closure and Reuse of Fort Ord, Monterey County, California (1-8-99-F/C-39R), United States Fish and Wildlife Service, March 30, 1999 27. Biological Opinion on the Closure and Reuse of Fort Ord, Monterey County, California, as it affects Monterey Spineflower Critical Habitat (1-8-01-F-70R), United States Fish and Wildlife Service, October 22, 2002 28. Cleanup and Reuse of Former Fort Ord, Monterey County, California as it affects California Tiger Salamander and Critical Habitat for Costa Contra Goldfields (1-8-04-F-25R), United States Fish and Wildlife Service, March 14, 2005
28	Fig. 1-1	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Figure 1-1 and subsequent figures. There seems to be some inconsistency with the Army's previously produced documentation. The Workplan Addendum defines an MRA which was not done previously. An MRA consists by definition of one or more MRSs, which were defined in previously produced Army documents. Therefore, the western boundary of the MRA is not the same as the property transfer boundary. The MRA should more properly be defined as along the eastern side of General Jim Moore Blvd. and southern side of Eucalyptus Road. The MRA does not extend to the west and north of these roads. There is also an internal inconsistency with the figures/maps themselves with regards to boundaries of the MRSs.</p> <p>Response:</p> <p>The associated figures in Appendix A have been corrected to clarify the MRS and MRA boundaries. The western boundary of MRS-15SEA.1 and MRS-15SEA.2 do not extend west of General Jim Moore</p>

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			<p>Boulevard as correctly stated in the comment. The western boundaries of the property transfer parcels extend west of General Jim Moore Boulevard and, therefore, have been included as part of the Seaside MRA as required by the FORA ESCA RP.</p>
29	Fig. 2-2	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Figure 2-2. The Project Organization Chart does not identify Senior UXO Technical Manager, QC Geophysicist, Senior Geophysicist, and Database Manager who have QC roles identified in the Quality Control Plan and related tables.</p> <p>Response:</p> <p>We recognize that these individuals were not identified on the organization chart; therefore, the roles and responsibilities of these individuals were defined within the text of the SSWP Addendum. No modifications to the organization chart have been implemented.</p>
30	Map A-5	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>In the PDF version, this map indicates that FORA intends to apply minimum separation distance to the property boundary rather than the MRS boundary which may result in undue disturbance to residents of Seaside. In the hard copy received at the BRAC office, the minimum separation distance is not included in this map.</p> <p>Response:</p> <p>The PDF version of the SSWP Addendum contains the wrong figures in Appendix A. The hard copy version of the SSWP Addendum contains the correct version of figures to support the MEC clearance activities at the Seaside parcels. Minimum separation distances (MSDs) will be enforced during MEC clearance activities at MRS-15SEA.1 and MRS-15SEA.2. Since the MSDs are expected to vary depending on location based on the anticipated type of MEC item to be encountered, the correct figures do not graphically illustrate MSDs. In lieu of graphically representation, a table of anticipated MSDs is included in the SSWP Addendum as Table 4-2.</p>

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31	2.2.3	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>Appendix C, Page 4 -- Activities involving soil disturbance need MEC avoidance measures or construction support if appropriate.</p> <p>Response:</p> <p>The following sentence has been added to Section 2.2.3 in response to this comment:</p> <p>“Activities involving soil disturbance will require MEC avoidance measures or construction support, if appropriate.”</p>

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1	2.3.2	Judy Huang, EPA	<p>Comment:</p> <p>SCA Removal and Soil Sifting, page 13: The first sentence in the second paragraph of this section states that “All mechanized operations will maintain a K24 separation distance between the operator of the equipment, sifting screens, and potential MEC.” It is unclear as to how this will be accomplished for backhoe operators. For example, if the MEC item of concern is an M43 series 81mm HE mortar, this item will contain approximately 1.3 pounds of explosives filler. This would require that the backhoe operator be separated by a minimum of 26 feet from one of these mortars while it is excavated.</p> <p>While this distance can be maintained for the operator(s) of the screening equipment, it appears that it cannot be accomplished for the backhoe operator(s). Please review the cited section and determine if the noted separation distance is to be maintained for all equipment operators or only for the screening equipment personnel. If only the screening equipment personnel require the K24 distance, please revise Section 2.3.2 to reflect this. If it is not the intent, and all equipment operators are to be afforded the k24 distance, please revise Section 2.3.2 to explain how this will be accomplished for personnel excavating MEC with a backhoe.</p> <p>Response:</p> <p>The first sentence of the paragraph has been replaced with the following:</p> <p>“The K24 distance will be maintained between the sifting plant operator and the sifting plant machinery.”</p>
2	Table 4-2	Judy Huang, EPA	<p>Comment:</p> <p>Minimum Separation Distance by Area: Footnote number 4 to this table reads as follows: “To obtain the K328 for intentional detonation, add the donor charge NEW to the NEW of the grenade (determine the TNT equivalent weight of the explosive), multiply by the safety factor of 1.2, obtain the cube root of that product and multiply by 328 to get the actual intentional detonation MSD for intentional detonations.” The intent of this footnote is unclear because of the inclusion of the word “grenade” therein. It appears that the word “grenade” should be replaced by the term “MEC item.” If this is the case, please make this correction. If not, please explain why the use of the word “grenade” is appropriate.</p> <p>Also, the footnote ends with, “...the actual intentional detonations</p>

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			<p>MSD for intentional detonations.” It appears that there are too many “intentional detonations” in this sentence. Please correct this.</p> <p>In addition, footnote 4 is not referenced anywhere in the body of the table. Please insert the footnote number “4” at the appropriate location in Table 4-2, or delete it from the list of footnotes.</p> <p>Response:</p> <p>The word “grenade” has been replaced with “MEC” in footnote 4.</p> <p>The end of footnote 4 has been changed as follows: “...the actual intentional detonations MSD for intentional detonations.”</p> <p>A number “4” has been inserted in the heading for the first column under the “For Intentional Detonations” portion of the table to support the footnote.</p>
1	Verbal Comment, Acronym List	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Provided a verbal comment to the LFR Team indicating that the acronym list still has errors, specifically “micrograms per square meter” should be “micrograms per cubic meter.” Please review and update as necessary.</p> <p>Response:</p> <p>The acronym list has been reviewed and revised as indicated above. There were no other errors located in the acronym list.</p>
2	Verbal Comment, 2.3.5.3	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Provided a verbal comment to the LFR Team indicating that the last sentence of Section 2.3.5.3 should be revised. There should not be any overburden on a near-surface anomaly existing at 0”- 6” bgs.</p> <p>Response:</p> <p>The last sentence of Section 2.3.5.3 has been deleted.</p>
3	Verbal Comment, Section 11.0 and Table 11-2	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Provided a verbal comment to the LFR Team indicating that a conflict of interest exists if the quality assurance (QA) functions are conducted by personnel within the same organization. Section needs to be revised to clarify the interaction between quality control (QC) personnel within</p>

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			<p>Weston, and the interaction between Weston’s QC personnel and QA personnel working for an independent entity.</p> <p>Response:</p> <p>Section 11 has been revised to clarify the interaction between QC personnel and QA personnel. QA functions will be conducted by an independent third party contracted by FORA and an independent QA program has been prepared and provided to the regulatory agencies for review. QC will be handled internally by Weston personnel; therefore, the references to “QA Manager” in the third paragraph of Section 11.1, the third paragraph of Section 11.2.2, and in the fourth, fifth, and sixth rows of Table 11-2 have been changed to indicate “QC Manager”. In addition, the reference to “Corporate QA representatives” in the first sentence of Section 11.10.1 has been changed to “Corporate QC representatives.”</p>
1	General Comment	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>DTSC provided comments to the draft version of this document and concurs with the revisions provided in the Response to Comments in Appendix G.</p> <p>Response:</p> <p>No response required.</p>
2	General Comment	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>DTSC was provided revisions (Draft Final-Seaside_Adden-Dec2007-09597.doc) to the Draft Final SSWP on January 9, 2008 at the ESCA RP meeting. The revisions proposed are acceptable.</p> <p>Response:</p> <p>No response required.</p>
1	Signature Page	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Please provide signature page in the Final version that includes Mr. Stan Cook representing FORA.</p> <p>Response:</p> <p>The signature page has been updated to include a signature line for Mr. Stan Cook of FORA.</p>

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2	Glossary	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Page xx, Small Arms Ammunition. Delete the phrase “Replaces Small Arms” at end of definition. This appears to be a place holder.</p> <p>Response:</p> <p>The phrase has been deleted from the definition.</p>
3	1.3	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Site Location, 2nd Paragraph. The first sentence reports that the reuse parcels are USACE. Transfer deeds will generally list these parcels as Army reuse parcels. Please correct if this is the case.</p> <p>Response:</p> <p>The LFR Team is in the process of determining the correct nomenclature for transfer parcels and will incorporate the nomenclature in subsequent documentation, if appropriate.</p>
4	Figure 2-2	Roman Racca, CAL EPA / DTSC	<p>Comment:</p> <p>Project Organization Chart. DTSC has been informed that a Quality Assurance contractor will be hired by the FORA to conduct MEC quality assurance independent of LFR and Weston. Please insert the FORA Quality Assurance contractor in the appropriate location that reflects this project relationship.</p> <p>Response:</p> <p>The Project Organization Chart has been updated to depict the relationship between the third party quality assurance contractor hired by FORA and the LFR Team.</p>
1	Verbal Comment, Appendix C	Therese McGarry, CAL EPA / DTSC	<p>Comment:</p> <p>Appendix C – Building Removal Plan. Provided a verbal comment to the LFR Team to include a section on quality control/quality assurance for sampling activities.</p> <p>Response:</p> <p>Section C-2.1.4, Soil Sampling Quality Control and Quality Assurance, has been added to the Building Removal Plan to indicate quality control and quality assurance procedures (field, laboratory, and</p>

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			documentation) to be implemented during pre- and post-demolition soil sampling activities. References to these quality control and quality assurance procedures have also been added to Section C-2.3.1, Post-Demolition Soil Sampling, and Section C-2.3.3, Post-Excavation Soil Sampling.
1	General Comment	Therese McGarry, CAL EPA / DTSC	<p>Comment:</p> <p>Please give us a brief synopsis of what you found and not just the raw data.</p> <p>Response:</p> <p>Section C-3.0, Closeout Report, has been updated to indicate that the results of the soil sampling activities will be summarized in the closeout letter report.</p>
1	2.3.1.5, Page 13	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>The second to the last paragraph of this section references <i>Administrative Draft Addendum to the General Jim Moore Boulevard/Eucalyptus Road Improvement Project, Environmental Assessment (EA)/Initial Study (IS)</i>, prepared for FORA by Pacific Municipal Consultants, June 2007 [Ref 24]. This document has been finalized, therefore, the final, signed version (dated July 2, 2007) of the Addendum should be referenced.</p> <p>Response:</p> <p>The reference in this section has been updated to indicate the final version of this document dated July 2, 2007. The “References” section of the SSWP Addendum has also been updated in response to this change.</p>
2	2.3.1.2, Page 11 and responses to the Army’s comments on page G-7	Gail Youngblood, U.S. Army	<p>Comment:</p> <p>We appreciate the additional information provided in the draft final version regarding the specification of the fence that will be installed along the eastern perimeter of the sites, to include gates and signs, and your commitment to coordinate the fence and gate requirements with the Presidio of Monterey (POM) Fire Department. However, as previously communicated to you and the LFR Team, the POM Fire Department requires five gates along this stretch of the Blue Line fuelbreak (at entrances to regularly-maintained fuel breaks) for emergency access to and from the Impact Area. These access gates are</p>

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			<p>required for the safety of emergency response personnel who may be working in the Impact Area. Please revise the subject work plan so as to meet this requirement.</p> <p>Response:</p> <p>Section 2.3.1.2, second to last sentence, has been updated to indicate “five” gates as follows:</p> <p>“To allow for access to the inland range, <i>five</i> 25-foot wide swing gates with posts and concertina wire strung on top will be installed.”</p>
c	Table 4-2	Explosives Safety Submission (ESS) content changes related to the SSWP Addendum	<p>Comment:</p> <p>The attached Table lists the munition with the greatest fragmentation distance (MGFD) for each portion of MRS15-SEA.4, the team separation distance (TSD), the minimum separation distance (MSD) for unintentional detonations for non-essential personnel, the MSD and net explosives weight (NEW) for intentional consolidated detonations for non-essential personnel, and the K24 and K18 distances.</p> <p>Response:</p> <p>The information provided in the table from DDESB has been incorporated into Table 4-2 of the final version of the SSWP Addendum. As indicated in the ESS, MGFDs were identified only in Seaside 4 (MRS15-SEA.4), which included a grenade (Mk II), a 60mm mortar (M49A2), and a 57mm projectile (M306); therefore, the rows referencing MGFDs for Seaside 1, Seaside 2, and Seaside 3 have been deleted. In addition, the corresponding values for the hazardous fragment distances (HFDs), K40 distances, K328 distances, and the TNT equivalent net explosives weight (NEW) for consolidated shots have been updated for the identified MGFDs in Seaside 4.</p>
f	Table 4-1 and Figure 4-1	ESS content changes related to the SSWP Addendum	<p>Comment:</p> <p>Standard earth-covered magazines 763, 764, and 765 are each site approved to store up to 100 pounds (lbs) NEW HD 1.1 and mission essential quantities of HD 1.4. The inhabited building distance for sides and rear are 250 feet (ft) and front is 500 ft; public transportation route distance for sides and rear are 150 ft and front is 300 ft; and intermagazine distance is 7 ft side-to-side, based in the HD 1.1 limits.</p> <p>Response:</p> <p>Table 4-1 has been revised to indicate the appropriate distances of</p>

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			<p>“250/500” ft for habited buildings and “150/300” ft for public transportation routes. In addition, table columns titled “Amount” and “Net Exp. Wt. (Lbs)” have been deleted because the information no longer applies.</p> <p>In support of the changes to Table 4-1, Figure 4-1 entitled “Explosives Storage Location (Buildings 763, 764, and 765) Quantity Distance Criteria” was deleted and replaced with three separate figures corresponding to Buildings 763, 764, and 765 (Figures 4-1, 4-2, and 4-3, respectively) that identify the appropriate minimum separation distances for inhabited buildings and public transportation routes.</p> <p>Based on this comment, the Figures list on Page xi of the Table of Contents has also been updated to include the three new figures (Figures 4-1, 4-2, and 4-3).</p>