

Response to Comments
 DRAFT Technical Information Paper Phase II Seaside Munitions Response Area
 Roadway Alignment and Utility Corridor, dated August 5, 2008
 Review comments provided by Judy Huang of EPA, dated September 5, 2008

No.	Comment Type / Report Section	Comment/Response
1	General Comment	<p>Comment:</p> <p>The Draft Technical Information Paper, Phase II Seaside Munitions Response Area (MRA) Roadway Alignment and Utility Corridor, dated August 5, 2008, (hereinafter referred to as the Draft TIP), fulfills the Administrative Order on Consent for Cleanup of Portions of the Former Fort Ord (AOC) Task 10 requirements for the submittal of Pollution Reports (POLREPS), and Removal Action Activity Report. Please re-title the report and modify the Executive Summary to include references to the POLREPS and the Removal Action Activity Report.</p> <p>Response:</p> <p>The report has been re-titled and the Executive Summary has been modified to include references to the POLREPS and Removal Action Activity Report as required by the AOC under Task 10.</p>
2	General Comment	<p>Comment:</p> <p>The Draft TIP does not fully explain the disposition of some of the special case areas (SCAs). In some instances, the information presented in succeeding portions of the document appears to be inconsistent. For example, the last bullet of Section 3.2, General Approach, reads as follows: “SCA_W014, SCA_W035, SCA_W037, SCA_W039, SCA_W041, SCA_W048, SCA_W055, SCA_W057, SCA_W066, SCA_W074, SCA_W118, SCA_W119, SCA_W112, SCA_W123, SCA_W124, SCA_W125, SCA_W129, SCA_W130, SCA_W143, SCA_W151, SCA_W158, SCA_W159, SCA_W161, and SCA_W162: These SCA polygons presented a variety of terrain, steep slopes, proximity to existing fences, gates, and other challenges that prevented the collection of DGM data using geophysical equipment.” As this reads, it appears to indicate that no geophysical data was collected from any portion of these SCA polygons.</p> <p>However, Section 3.9.6.3, Various SCAs, reads as follows: “DGM surveys could not be completed in small portions of 24 SCA polygons, including SCA_W014, SCA_W035, SCA_W037, SCA_W039, SCA_W041, SCA_W055, SCA_W057, SCA_W066, SCA_W074, SCA_W118, SCA_W119, SCA_W112, SCA_W123, SCA_W124, SCA_W125, SCA_W129, SCA_W130, SCA_W143, SCA_W151, SCA_W158, SCA_W159, SCA_W161, and SCA_W162. These SCA polygons presented a variety of terrain, steep slopes, proximity to existing fences, gates, and other challenges that prevented the collection of DGM data using geophysical equipment. UXO Technicians conducted analog surveys and removal actions</p>

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		<p>as described above. The locations where the analog surveys were completed are shown on Figures 3-20 and 3-21 and on more detailed maps provided in Appendix E.” As this section reads, it appears that limited DGM data was gathered from each of the listed SCAs, and analog geophysical data was used to supplement the incomplete digital surveys. This differs from Section 3.2 as cited in the previous paragraph, which appears to state that no DGM data was to be gathered from the listed SCAs.</p> <p>A review of Table 5-5, DGM Investigation Results for SCA Polygons and Hillside West of General Jim Moore Boulevard, omits SCA_W041 from the listing of SCAs that had portions surveyed using digital geophysical instruments. However, Table 4-1, Summary of Known and Blind QC Seed Items for DGM Surveys, lists SCA-041 as having a seed item located therein for the geophysical survey conducted on this SCA. This disagrees with the previously cited Section 3.2, which indicated that SCA-041 could not be digitally surveyed.</p> <p>Please review the listed sections and tables and revise them as needed to make them read consistently. In addition, SCA-112 is not listed in numerical sequence in Section 3.2 and Section 3.9.6.3. Please determine if this was intended for some unstated purpose or is a typographical error that needs correction.</p> <p>Response:</p> <p>The majority of the SCA polygons at the site underwent a DGM survey within at least some portion of the polygon area and analog surveys were conducted to supplement the incomplete datasets when necessary. Section 3.2 has been revised to clarify these activities.</p> <p>As such, the last bullet of Section 3.2 has been revised as follows:</p> <ul style="list-style-type: none"> • SCA_W014, SCA_W035, SCA_W037, SCA_W039, SCA_W041, SCA_W048, SCA_W055, SCA_W057, SCA_W066, SCA_W074, SCA_W112, SCA_W118, SCA_W119, SCA_W112, SCA_W123, SCA_W124, SCA_W125, SCA_W129, SCA_W130, SCA_W143, SCA_W151, SCA_W158, SCA_W159, SCA_W161, and SCA_W162: These SCA polygons presented a variety of terrain, steep slopes, proximity to existing fences, gates, and other challenges that prevented the collection of DGM data <i>in portions of the SCAs</i> using geophysical equipment.

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		<p>In addition, the following bullet has been added to the section:</p> <ul style="list-style-type: none"> • <i>SCA_W137 and SCA_W165: These SCAs contained asphalt that was left in place because the asphalt was part of an existing road or apron at gated entrances to the MRA. The asphalt was kept in place to provide stabilized construction site entrances and to minimize erosion and dirt track-out onto public streets. As a result, DGM surveys were not performed in the portions of these SCAs located within the roadway alignment. These SCAs are discussed in Section 5.7.</i> <p>As shown on Map B-3 in Appendix B, SCA_W041 is actually located outside of the boundaries of the roadway alignment. Therefore, any reference to this SCA in the text or tables of the TIP has been removed.</p> <p>SCA_W112 appeared out of numerical order in error and the appropriate sections have been revised.</p>
1	Specific Comment	<p>Comment:</p> <p>Glossary, Page ix: The acronym “OE” is an obsolete term and should be identified as such. However, it is understood that it is used in historical documents, and the definition is necessary to avoid confusion. Please identify it as an obsolete term by footnote or any other appropriate means selected.</p> <p>The first paragraph of the text used to define the term “Construction Support” matches the verbiage found in Appendix 1, Glossary, of DoD 6055.9-STD (DoD Ammunition and Explosives Safety Standards, 29 February 2008). However, the source of the verbiage in the second paragraph of the definition appears to be any of a number of U.S. Army Corps of Engineers (COE) publications with some of the wording having been modified.</p> <p>It has been the generally accepted practice for documents related to the Military Munitions Response Program (MMRP) to use the official definitions provided by the Department of Defense or its subordinate agencies (i.e., Army, COE). These definitions should be used as provided without modification unless there is some overriding reason to develop a site-specific version of the definition.</p> <p>Please review the cited definition of Construction Support and change it as necessary to correspond to an official version thereof. If a site-specific definition of the term is deemed necessary, please provide the justification for this and annotate the definition as site-specific.</p>

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		<p>Response:</p> <p>The definition of OE has been revised as follows: <i>“Ordnance and explosives (OE) is an obsolete term replaced by munitions and explosives of concern (MEC). See MEC in the glossary for further definition.”</i></p> <p>The cited definition of Construction Support has been reviewed. The second paragraph of the definition for Construction Support has been deleted.</p>
2	Specific Comment	<p>Comment:</p> <p>Executive Summary, Page xiii: The second bullet of the third paragraph in the Executive Summary states that the scope of work for the action included, “Scraping and sifting of surface soils within the areas previously identified as special case areas (SCAs) by the Army where MEC removal actions could not be completed.” The use of the previously undefined term “surface soils” raises a question as to exactly what is intended by the use of the term. While this is later defined in Section 3.2, General Approach, of the Draft TIP, it would be helpful if it were either defined here or if Section 3.2 were referenced. Please make this change in a manner deemed appropriate.</p> <p>Response:</p> <p>The bullet has been revised as follows:</p> <ul style="list-style-type: none"> • <i>Scraping and sifting of surface soils and/or excavating soils within the areas previously identified as special case areas (SCAs) by the Army where MEC removal actions could not be completed. A minimum of the top 6 inches of surface soils were scraped within the SCAs located in the roadway alignment and utility corridor. The SCAs were scraped to greater depths (generally 12 inches but in some cases down to 10 feet) where additional removal of soil was necessary to minimize the number of discrete anomalies from the subsequent DGM survey;</i>
3	Specific Comment	<p>Comment:</p> <p>Executive Summary, Page xiv: The last two sentences of the second paragraph on this page of the Executive Summary state that, “All subsurface target anomalies that potentially represented MEC were intrusively investigated and removed, except in a few cases where anomalies were left in place. These anomaly locations were defined as “left in place” because the areas could not be adequately investigated using the best available (and</p>

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		<p>appropriate) detection technology (BADT) due to the metallic content of these features.” The Executive Summary does not provide or reference an explanation as to what further action will be taken to protect the public from the potential MEC that may be present at these locations after all construction activities have been completed. Please expand the Executive Summary to provide a statement as to what is planned for these uninvestigated areas, or reference where it may be found elsewhere.</p> <p>Response:</p> <p>The end the of the paragraph has been revised as follows: “These anomaly locations were defined as “left in place” because the areas could not be adequately investigated using the best available (and appropriate) detection technology (BADT) due to the metallic content of these features. <i>As discussed below, active UXO construction support will be utilized for construction or any other intrusive activities within the left in place anomaly locations.</i>”</p>
4	Specific Comment	<p>Comment:</p> <p>Section 2.2, Site History, Page 2-3: The last paragraph of this section refers to activities involving munitions on the ranges that were present in the Seaside Munitions Response Area (MRA) and states that, “It is expected that munitions activity associated with these ranges would have occurred at the firing points.” While this is a generally correct statement, it should not be interpreted to indicate that areas behind or in the general vicinity of the firing lines should be free of discarded military munitions (DMM) or other MEC. Department of the Army Pamphlet (DA Pam) 385-63, Range Safety, contains the following statement: “3-2. Positioning and issuing ammunition and explosives: <i>a.</i> Ammunition and explosives (to include pyrotechnics) will be positioned to minimize the potential for ignition from external sources, explosion, rapid burning, or sympathetic detonation and will be located and stored in accordance with this pamphlet and requirements of AR/DA PAM 385-64 (Army) or NAVSEA OP5 (Marine Corps) as appropriate.” As a result, units often do not position all of the ammunition to be used during the firing activities (particularly items containing high explosives) on the firing line, but maintain a distance between the ammunition in use and the ready stacks of munitions. Based upon this, the cited sentence would better express the actual conditions that likely existed on the ranges if it were modified to read, “It is expected that munitions activity associated with these ranges would have occurred at, <i>or in the general vicinity of,</i> the firing points.” Please make this change.</p>

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		<p>Response:</p> <p>The sentence has been revised as follows: “It is expected that munitions activity associated with these ranges would have occurred at, <i>or in the general vicinity of</i>, the firing points.”</p>

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1	Specific Comment, Page 2-5	<p>Comment:</p> <p>Text states: “These actions resulted in the complete removal of detected MEC to a depth of 4 feet.” (emphasis added).</p> <p>Comment: While a stringent criteria, including the anomaly selection process was employed, it's possible that some of the anomalies not investigated could be MEC items. The absence of 100% detection and removal is reinforced in the document by acknowledging the technical limitations. As stated on page xiv of the Executive Summary – “Based on the results of the removal actions, the potential fro residual MEC risks remain within the roadway alignment and utility corridor.”</p> <p>Response:</p> <p>The text on Page 2-5 has been revised as follows: “These actions resulted in the complete removal of detected <i>anomalies selected as potentially representing</i> MEC to the a depth of detection-4 feet, with the exception of the SCAs and the hillside west of GJMB.”</p>
2	Specific Comment, Pages 3-4 and 3-5	<p>Comment:</p> <p>Text states: “In a few cases the approach was modified...” and goes on to describe what special case areas where this modified approach took place.</p> <p>Comment: It would be helpful to define what was found as a result of this modified approach rather than limiting text to the description of why and what the modification was.</p> <p>Response:</p> <p>Based on discussions with the regulatory agencies, a more detailed discussion of the items found as a result of this modified approach will be provided as part of the Group 1 RI/FS.</p>
3	Specific Comment, Appendix F	<p>Comment:</p> <p>Comment: I did not go through every page of this appendix but was concerned that erroneous units were listed for depth of the items investigated. The column under Depth shows "lbs" not inches, feet, centimeter or fractions/multiples thereof.</p> <p>Similarly, the amplitude of signal strength was missing in the first few pages</p>

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		<p>as well as any notation that QC was performed.</p> <p>Response:</p> <p>The column heading for Depth in the database table provided in Appendix F has been revised to correctly indicate depth in “inches”.</p> <p>The amplitude of signal strength has been added to the first few pages of the database table in Appendix F to be consistent with the remainder of the table. In addition, notations related to performing QC operations have also been added to the database table in Appendix F.</p>
4	Specific Comment, Quality Control	<p>Comment:</p> <p>Regarding QC: I question the use of such high value millivolt (mV) seeds. As stated on page 3-26 – “Target selection thresholds would initially be based on analysis of a portion of background data in each dataset. This background data would be examined to calculate a threshold of three times the standard deviation.”</p> <p>Further explanation should be provided as to why seeds with 676mV (Appendix F, SCA 005 target 34), 555mV (SCAW003, target 13) are used rather than seeds with millivolts representing smaller targets of interest.</p> <p>Response:</p> <p>The high millivolt seeds that appear in the database are the QC “Spikes” that are identified in Section 4.3.4 of the TIP as Known QC Seeds. Known QC seed items were used to quantify the positional accuracy of each dataset. The geophysicists were aware of the location of the Known QC seed items throughout the DGM survey and data processing activities. The Known QC spikes were not intended to represent items of concern, but only to verify the positional accuracy of the GPS and geophysical processing.</p> <p>In addition, Blind QC items were placed in various locations throughout the MRA where geophysical operations occurred. The locations of the Blind seed items were not known to the geophysicists during the DGM survey or data processing activities. The Blind seed items were also not known to the UXO Teams. The four Blind QC seeds placed in the roadway alignment and utility corridor portions of the Seaside MRA are summarized at the bottom of Table 4-1. The response amplitudes for the Blind QC seed items ranged from 39-155 mV. Additional Blind QC seed items were placed in Special Case Areas located outside of the roadway alignment and utility corridor. The results of</p>

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		<p>those Blind QC seed items will be reported as part of the Group 1 RI/FS.</p> <p>In addition, the database table in Appendix F has been revised to indicate whether a QC seed item was “Known” or “Blind”, which appears in the “Item Category” column of the database table in Appendix F of the Final TIP.</p>

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1	p.1-1. Section 1.0 Introduction	<p>Comment:</p> <p>Several documents are listed under the third paragraph. The final soil management plan is not currently in the Administrative Record but should be entered into the Record.</p> <p>Response:</p> <p>The Soil Management Plan will be uploaded to the Administrative Record before this report goes final.</p>
2	p.2-2. Section 2.2 Site History	<p>Comment:</p> <p>First paragraph describes the types of pre-WWII-era munitions previously found in the Seaside MRA: “These munitions included Livens projector shells, Stokes mortars, and 37 millimeter (mm) and 75mm projectiles.” To avoid unnecessary confusion, it should be clarified that that Livens projector and Stokes mortars (MEC) previously found at the former Fort Ord have been high explosive, practice or screening smoke (not CWM).</p> <p>Response:</p> <p>The following sentence has been added to the paragraph:</p> <p><i>“The Livens projector shells and Stokes mortars previously found at the former Fort Ord have been high explosive, practice, or screening smoke.”</i></p>
3	p.2-2. Section 2.2 Site History	<p>Comment:</p> <ul style="list-style-type: none"> • Second paragraph discusses “18 firing ranges and training sites within the boundaries of the 8,000-acre multi-range area, which was the area outside the perimeter of the former impact area.” This description is confusing since the 8,000-acre historical Impact Area was formerly called Multi-Range Area. Please revise. • The bullets at the bottom of the page identify “Range 59” and “Range 50” as part of historical activities within the Seaside MRA. The Army has identified “Historical Areas” numbered HA-59 and HA-50 within the Seaside MRA with the same descriptions (M-1 Table IX and Booby Traps Area, respectively), however these areas were not assigned range numbers. Please revise the descriptions of these areas to avoid confusion.

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		<p>Response:</p> <ul style="list-style-type: none"> • For clarification, the text has been revised as follows: “By 1945, the Army established 18 firing ranges and training sites within the boundaries of the 8,000-acre multi-range area, which was the area outside the perimeter of the former impact area. The Seaside MRA lies on the westernmost part of the former multi-range <i>impact</i> area.” • “Range” has been replaced with “Historical Area” to avoid confusion.
4	p.2-4. Section 2.3.4 Seaside MRA Ecological Profile. First paragraph	<p>Comment:</p> <p>The HMP identifies Seaside MRA as a development parcel, but does not state that development within the Seaside parcels includes residential reuse. Please modify the statement to avoid potential misinterpretation. Second paragraph, first sentence indicates that the “2005 Biological Opinion for the Cleanup and Reuse of the former Fort Ord required that an HMP be developed and implemented...” It was the 1993 Opinion that required the development of the HMP. Second paragraph, second sentence, actions that are described in the HMP are more than mere “guidelines” therefore we suggest the word “mitigations” instead.</p> <p>Response:</p> <p>The sentence regarding the development parcel has been revised as follows: “The Habitat Management Plan (HMP) identifies the Seaside MRA as a development parcel (which includes residential reuse) with a borderland development buffer area along the interface with the NRMA, which is designated as habitat reserve (USACE 1997).”</p> <p>The date of the BO requiring an HMP has been revised from 2005 to 1993.</p> <p>The second paragraph, second sentence has been revised as follows: “The HMP for the former Fort Ord complies with the USFWS BO and establishes the guidelines <i>mitigation measures</i> for the conservation and management of wildlife and plant species and habitats that largely depend on former Fort Ord land for survival.”</p>
5	p.2-5. The last paragraph (Section 2.4 Previous Investigations)	<p>Comment:</p> <p>The paragraph describes that the non-time critical removal action (NTCRA) conducted within MRS-SEA.1-4 resulted in “removal of detected MEC to a depth of 4 feet.” Please note that geophysical anomalies were investigated to the depths of detection; anomalies were investigated until they were resolved or removed even below the 4-ft depth</p>

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		<p>(except the Special Case Areas). This is described in the Parsons work plan that is referenced in the section.</p> <p>Response:</p> <p>The sentence has been revised as follows: “These actions resulted in complete removal of detected MEC to the a <i>depth of detection 4 feet</i>, with the exception of the SCAs and the hillside west of GJMB.”</p>
6	p.3-19. The last paragraph (Section 3.7 Scraping Operations of SCA Polygons within the Roadway Alignment and Utility Corridor)	<p>Comment:</p> <p>The last sentence uses a term “pre-sifted stockpile.” Please describe this material or use a different term since it is difficult to understand what it means.</p> <p>Response:</p> <p>To avoid confusion, the last paragraph has been revised as follows:</p> <p>“Scraped soil was loaded onto haul trucks and transported to a soil stockpile staging area in Seaside MRS-15SEA.1. The locations of the sifting plant and soil stockpile staging area are shown on Figure 3-13. <i>As shown on the figure, the locations of the sifting plant and soil stockpile staging area were located outside the limits of the roadway alignment and utility corridor.</i> The soil was staged in discrete stockpiles by MRS (MRS-15SEA1 through MRS-15SEA.4). The pre-sifted stockpiles were located outside the limits of the roadway alignment and utility corridor.”</p>
7	p.3-20. Section 3.8 Sifting Operation of SCA Scraped Soil	<p>Comment:</p> <p>This section should be updated to include the sifting operations that continued to be conducted after the issue date of the draft report.</p> <p>Response:</p> <p>A discussion of the continuing sifting operations has been added to the text; however, the volumes of sifted soil have not been changed as the soil that has been sifted since the issue date of the draft report has been from soil that was scraped from SCAs located outside the roadway alignment or utility corridor. The text on Page 3-20, second full paragraph, has been revised as follows:</p> <p>“Sifting operations <i>of scraped soil from SCAs within and outside the roadway alignment and utility corridor</i> began on April 9, 2008; <i>sifting operations of scraped soil from SCAs within the roadway alignment and</i></p>

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		<p><i>utility corridor</i> were completed on July 23, 2008. <i>After July 23, 2008 sifting continued for soil removed from SCAs outside of the roadway alignment and utility corridor.</i> There were a minimum of two UXO Technicians (UXO Technician II or equivalent) on site during active sifting operations. The UXO Technicians conducted an overall visual survey of the area prior to starting operations and inspected the sifted materials.”</p>
8	p.4-4. Section 4.3.4.1 Known Seed Items	<p>Comment:</p> <p>The section discusses the number of successfully recovered known QC seed items but does not state that any were missed. Please update the section to clearly state whether any known QC seed item was missed.</p> <p>Response:</p> <p>None of the known QC seed items were missed during the investigation and removal action conducted within the roadway alignment and utility corridor. The ESCA RP Team determined that one known QC seed item, however, was inadvertently removed during soil scraping activities. Therefore, it was not available for quality control purposes during the geophysical survey.</p> <p>Following submittal of the draft TIP, the ESCA RP Team discovered that several known QC seed items identified in Table 4-1 were actually located outside of the boundaries of the roadway alignment or utility corridor. Therefore, Table 4-1 has been revised to include only the known QC seed items that were positioned within the roadway alignment and utility corridor.</p> <p>The text in Section 4.3.4.1 has been revised as follows to address the above Army comment and to correct errors related to the number of known QC seeds within the roadway alignment and utility corridor:</p> <p>“A total of 6453 QC seed items <i>were</i> placed within the roadway alignment or utility corridor SCAs. <i>Of these 53 items, 49</i> were successfully recovered during the DGM. Of these 64 QC seed items mapped, 62 were excavated within the DQO metrics (2 feet from their original surveyed location). The two exceptions were SCA_W049 and SCA_W161. The location of seed SCA_W049 was incorrectly entered into the database and was recovered in a different location and an offset could not be determined. Seed SCA_W161 <i>Three known QC seed items (identified as SEA1-A12 located in SCA_W140, SEA2-A8a located in SCA_W160, and SEA2-A11 located in SCA_W048) were recovered</i></p>

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		<p><i>during analog surveys within the SCAs. One item (SEA1-A5 located in SCA_W034) was removed during soil scraping operations and, therefore, was not recovered as part of the DGM survey.</i></p> <p><i>Of the 49 QC seed items recovered during the DGM survey, 47 were excavated within the DQO metrics (2 feet from their original surveyed location). The two exceptions were SEA2-A12 located in SCA_W049 and SEA2-A35 located in SCA_W161. The location of seed SCA2-A12 was incorrectly entered into the database and was recovered in a different location and an offset could not be determined. Seed SEA2-A35 was reported at 2.67 feet from its original location. The area of SCA_W161 is steeply sloped, resulting in a terrain offset. This offset was within the 3-foot-radius criteria established for the anomaly excavation.</i></p> <p>A total of nine QC seed items were placed within the hillside west of GJMB area. <i>All nine of these seed items</i> were successfully recovered during the DGM <i>within the DQO metrics (2 feet from their original surveyed location)</i>. Three were detected during the initial EM61-MK2 survey while the remaining six were mapped using the G-858 magnetometer.</p> <p>Detection results of each QC seed item are detailed in Table 4-1. The minimum offset was 0.05 foot and the maximum was 1.40 feet (excluding SCA_W161). The average offset for the group was 0.65 foot. These values reflect the high level of accuracy achieved for the navigation, detection, and anomaly selection processes over the duration of the field effort.”</p>
9	p.5-3. Section 5.5.2.1 SCA Polygons	<p>Comment:</p> <p>The section discusses that the depths of surface soil scraping ranged from 6 inches to 10 feet. If any additional information is available regarding specific scraping depths within specific areas of the site, please include in the report.</p> <p>Response:</p> <p>Scraping was conducted to the required depths based upon instrument responses observed in the field and were not specifically measured. Additional details on scraping depths in specific areas were not recorded, other than in the area where the depth was approaching 10 feet (since this was such an atypical depth). To address this comment, the following text has been copied from Section 3.7 and placed into Section 5.5.2.1:</p>

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		<p><i>“As stated in Section 3.7, scraping was conducted to the required depth until minimal anomaly responses were detected by the handheld instruments. The scraping of SCA polygons is shown in Photographs 3-12 and 3-13. Typically, the depth of scraping was approximately 6 inches; however, in some areas scraping extended deeper. In the case of SCA_W160, scraping extended to an approximate depth of 10 feet due to the presence of significant asphalt debris.”</i></p>
10	p.5-4. Section 5.5.2.2 Hillside West of GJMB	<p>Comment:</p> <p>The section discusses the soil sampling conducted by the Army at the location where pieces of TNT were removed. The soil sample was analyzed for explosives using EPA Method 8330. The preliminary results determined that concentrations of the target analytes were below the designated screening levels for the former Fort Ord. Therefore, no further investigation regarding potential soil contamination was recommended for this location. The information was provided to EPA and DTSC in a letter report and is available in the Administrative Record (OE-0658).</p> <p>Response:</p> <p>The following text has been added to the last sentence of this paragraph to summarize the Army’s soil sampling results:</p> <p><i>“The discovery of the bulk explosive in the soil prompted the Army to collect a soil sample on July 9, 2008 and analyze for explosive compounds using EPA Method 8330 since the potential for MC in soil is an Army-retained condition. The preliminary results of the Army’s soil sampling activities were presented in a letter report submitted to the EPA and the DTSC on August 19, 2008 (Army 2008). The preliminary soil sampling results indicated that the residual concentrations of explosive compounds in soil in this area were below designated screening levels for the former Fort Ord. Based upon these results, no further investigation of the area has been recommended by the Army.”</i></p>
11	p.5-4. Section 5.6 Demolition Results	<p>Comment:</p> <p>The section should be updated to include the information concerning the practice 40mm projectile (UXO) associated with the sifting operations and discovered on August 11, 2008.</p> <p>Response:</p> <p>The first paragraph of this section has been updated to include the following bulleted item presenting information for the 40mm projectile</p>

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		<p>found on August 11, 2008.</p> <ul style="list-style-type: none"> • <i>One 40mm projectile was found during spreading operations of the oversize reject material from the sifting plant that was being used by the Army for fuel break repairs within the Natural Resources Management Area.</i> <p>The following paragraph was also added to this section to provide information on demolition activities related to this 40mm projectile:</p> <p><i>“The second 40mm projectile was destroyed on August 14, 2008 at 14:58 using shaped charges (perforators) as indicated in Table 5-1.”</i></p> <p>Additional sections related to sifting operations and removal action results have been updated to include information on this 40mm projectile as appropriate. These additional sections include:</p> <ul style="list-style-type: none"> - Section 3.8, Sifting Operations of SCA Scraped Soil - Section 3.13, Project Field Variances - Section 5.0, Removal Action Results - Section 5.3, Soil Sifting Results
12	p.6-2. Section 6.0 Conclusions and Recommendations	<p>Comment:</p> <p>The second to last paragraph refers to a Finding of Suitability to Transfer as a document containing a requirement for construction personnel to complete the UXO recognition and avoidance training. The paragraph should instead refer to the Finding of Suitability for Early Transfer that applies to this property.</p> <p>Response:</p> <p>The reference has been revised from “Finding of Suitability to Transfer” to “Finding of Suitability for Early Transfer.”</p>
13	Tables	<p>Comment:</p> <p>The MRS designations are not used consistently (e.g. MRS-SEA15.1). Please use the designations consistent with the current Military Munitions Response Program database to avoid unnecessary confusion.</p> <p>Response:</p> <p>The MRS designations in the tables have been revised to use the designations consistent with the current MMRP database (i.e., MRS-15SEA.1 through MRS-15SEA.4).</p>

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14	Figure 1	<p>Comment:</p> <p>To reduce possible confusion, please consider updating the figures with the updated MRA names that were used in Draft Group 2 Remedial Investigation/Feasibility Study Work Plan, CSUMB Off-Campus and County North MRAs.</p> <p>Response:</p> <p>All of the figures which show the MRA names will be revised to include the updated names.</p>
15	Appendix H	<p>Comment:</p> <p>Attached are copies of the MEC incident forms reflecting the current (final) status of the incidental items noted in the Technical Information Paper. These forms have been made available to EPA and DTSC.</p> <p>Response:</p> <p>The MEC incident forms have been replaced with the forms provided by the Army, which reflect the final status.</p>

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 Review comments provided verbally by Roman Racca and Dan Ward of the DTSC during the
 FORA ESCA RP monthly regulatory meeting on August 28, 2008

No.	Comment Type / Report Section	Comment/Response
1	General Comment	<p>Comment:</p> <p>Provide Pages 15 and 16 of Appendix C - Subcontractor Daily Reports, which are missing from the PDF file on the CD.</p> <p>Response:</p> <p>A review of Pages 15 and 16 in Appendix C – Subcontractor Daily Reports indicated that the pages were not actually missing. These pages were extensions of Pages 13 and 14, respectively, which were converted incorrectly from excel format to PDF. In other words, Page 15 is the far right portion of Page 13 and Page 16 is the far right portion of Page 14. The PDF version of the daily reports has been corrected and will be provided as part of the Final submittal.</p>
2	General Comment	<p>Comment:</p> <p>Provide a summary of the daily reports in Appendix C (Contractor Daily Field Reports) that identifies key issues encountered during the fieldwork effort within the roadway alignment / utility corridor and the corresponding resolutions.</p> <p>Response:</p> <p>The summary of key issues and resolutions identified in the daily field reports have been incorporated into Appendix C of this report.</p>
3	General Comment (provided to FORA via email dated September 10, 2008).	<p>Comment:</p> <p>DTSC has reviewed the above referenced document and has similar concerns to those provided by EPA and the Army. Additional comments to be submitted by DTSC are related to clarification of specific areas within the Appendixes. DTSC will provide these additional comments by next week; however, is comfortable with the information as provided in the document and provided information as requested. DTSC has no issues which would prevent moving forward with the Roadway Alignment and Utility Corridor project. In order to avoid delays to the field work, DTSC comments can be addressed in the upcoming Seaside and Parker Flats RI/FS report.</p> <p>Response:</p> <p>DTSC comments will be addressed in the upcoming Remedial Investigation / Feasibility Study (RI/FS) for the Seaside and Parker Flats MRAs.</p>

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