Response to Comments
Draft Technical Information Paper Phase II Seaside Munitions Response Area (MRA) Outside Roadway Alignment and Utility Corridor, dated October 18, 2010
Review Comments Provided by Gail Youngblood of the Army, dated November 8, 2010

No.	Comment Type / Report Section	Comment/Response
1	Specific Comment, p. 3-2, Section 3.2 Recategorization of the Special Case Areas	**Comment:** The Section describes how the SCAs were Categorized by type. • Berms-The second bullet on this page describes the berms prevented geophysical surveys from being completed in their vicinity, and the eight berms were identified in the site, outside the roadway alignment and utility corridor. However, the report does not describe what work was done to complete the removal action in these areas. Table 3-1, SCA Point Location Outside Roadway Alignment and Utility corridor lists more than eight SCA points described as "berm" Please update the report to clarify. • Structures-The second to the last bullet indicates five range structures and seven field latrines were identified outside the roadway alignment and utility corridor. It also suggests that removal of these structures were necessary in order to conduct geophysical surveys. However, the report does not provide information that shows that these buildings were in fact removed. Please describe this work in a relevant section of the document for completeness. • Debris Piles – The last bullet indicates that several debris piles were identified in the site, outside the roadway alignment and utility corridor. However, the report does not describe subsequent actions to address the debris piles. It is noted final Technical Information Paper Phase II Seaside MRA Inside Roadway Alignment and Utility Corridor, dated September, 26 2008, describes that debris piles form the entire Seaside MRA were inspected for potential presence of MEC, segregated and disposed. Please include this information in a relevant section of this document for completeness. **Response:** The sixth bullet in Section 3.2 has been modified as follows: • Berms/***Retaining Walls*** – The metal connections on the wooden retaining walls of the berms located on the Seaside MRA prevented geophysical surveys from being successfully completed in the vicinity of the berms. ~~Eight berms were identified outside the roadway alignment and utility corridor.~~ ***A total of 31 points were identified as berms or retaining walls in the Army's dataset located outside of the roadway alignment and utility corridor, although in some cases the points were part of the same***

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		berm/retaining wall. Section 3.5.3 "Berm Removal Activities" was added to the report to address the relevant work that was performed to remove the berms as follows: *"3.5.3 Berm Removal* ***"Several SCA points were identified as berms/retaining walls in the Seaside MRA outside the roadway alignment and utility corridor. During previous Army removal actions, the metal connectors of the retaining walls prevented geophysical surveys from being conducted near the berms and the material in the berms was too thick to effectively detect MEC at or below the original ground surface. As part of the ESCA RP Team activities, the retaining walls were removed and the berms were deconstructed. Construction support was provided and excavators were used to remove the soil from the berm until the field crews were able to determine that the level of the berm matched the existing terrain or that the native soil levels had been reached. The excavated surface was cleared to depth using BADT and the soil from the berm was sifted and stockpiled on site as described in Section 3.8 of this report."*** A total of 14 structures and latrines and 24 debris piles were identified in the site, outside the roadway alignment and utility corridor. This number has been updated in the text of the document. Section 3.5.4 "Structure Demolition and Debris Removal Activities" has been added to the report to address the relevant work that was performed to remove the structures and debris piles as follows: *"3.5.4 Structure Demolition and Debris Removal Activities* ***"Fourteen structures were present outside the roadway alignment and/or utility corridor. These structures had previously been identified as buildings 9210, 9220, 9221, 9230, 9190, 9181, 8302, 8301A, 9482, 9481, 3940, 3939, 9460 and 9463. These structures were demolished and removed in order for DGM survey to be completed in the areas beneath the structures. In addition, numerous debris piles were located throughout the Seaside MRA;***

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		24 of these piles were located outside the roadway alignment and/or utility corridor, which needed to be moved in order to complete the DGM survey, identified as Pile No. 1, 2, 3, 11, 12, 14, 16, 17, 31, 5A-5D, 19, 20, 7, 8, 21, 23, 24, 25, 28, 29 and 30 (Figures 3-5 through 3-8). ***Prior to demolishing of existing structures, asbestos abatement and lead-based paint (LBP) stabilization was conducted. Asbestos abatement and LBP stabilization activities for the existing structures began in December 2007 and were performed by the subcontractor Performance Abatement Services of Richmond, California under the oversight of a California-Certified Asbestos Consultant and California Department of Public Health-Certified Lead Inspector/Assessor and Project Monitor. Following the asbestos abatement and LBP stabilization, the structures were demolished. Demolition activities were completed by the subcontractor Soil Enterprises Inc. of Brentwood, California. Asbestos abatement, LBP stabilization, and demolition activities were complete in January 2008.*** ***The debris piles from the entire MRA were inspected by UXO Technicians to ensure no MEC hazards were present. The piles were then consolidated into one central area and were segregated according to waste stream and transported off site to appropriate receiving facilities. A complete summary of demolition and debris pile removal activities for the entire Seaside MRA, including waste manifests and detailed disposal information, will be included in the RI/FS report."***
2	Specific Comment, p.3-21. Section 3.10.6.1 SCA_W140	**Comment**: The section refers to "the existing GJMB, which is still in use" as the reason for leaving some fence posts in place. Please consider modifying the description as it could be confusing once the new, realigned GJMB is opened for use. **Response**: This sentence in Section 3.10.6.1 was modified to read: "Removing the fence posts in this area would have caused damage to the asphalt and could have undermined the ***originally*** existing GJMB, which ~~is~~ ***was*** still in use ***at the time the ESCA RP Team completed the removal activities in the Seaside MRA."***

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3	Specific Comment, p.3-22. Section 3.11.2 Explosive Storage.	**Comment**: The section describes that a government-supplied explosives storage facilities are being used by the ESCA team in accordance with an approved explosives safety submission and a Right of Entry. Please consider, for clarification, modifying the sentence since this arrangement is no longer being utilized. **Response**: This sentence in Section 3.11.2 was modified to read: ***"During the Phase II removal activities in the Seaside MRA,*** ~~T~~***t***he ESCA RP Team ~~is using~~ ***used the*** government-supplied explosives storage facilities at the former Fort Ord in accordance with the approved LDSP and a Right of Entry agreement from the Army."
4	Specific Comment, Table 4-2 Summary of QC-2 Survey Results	**Comment**: The modified QC-2 process for the project included 100% QC-2 resurvey coverage in 30% of small SCAs and 10% QC-2 resurvey coverage in all of the large SCAs. However, the table shows the QC-2 coverage was smaller in some instances. It might be possible that the coverage was not correctly identified for SCA polygons that overlap the roadway alignment of the utility corridor. Please review the table and update it if necessary. **Response**: Table 4-2 has been revised. A column has been added to the table to show the portions of QC-2 survey that were conducted inside the roadway (for applicable SCAs) and the QC-2 survey column has been revised to show the total QC-2 resurvey area. With this revision, the QC-2 coverage for SCAs that received a QC-2 resurvey meets the modified QC-2 process requirements.
5	Specific Comment, p.4-6. Section 4.3.6.2 QC-2	**Comment:** 20 Small SCA polygons and 55 large SCA polygons are noted as being either partially or completely outside the roadway alignment and utility corridor. However, on p. 3-2 of the document, the total number of such polygons is 137. Please review the information and text, and update these sections as necessary. **Response:** The total number of SCA polygons is 129. Appropriate sections of the text have been revised. In addition, the first paragraph of Section 4.3.6.2 has been modified as follows: "The QC-2 process provided in the SSWP Addendum was revised

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		through a field variance dated July 28, 2008, and approved on July 30, 2008 (Appendix I, FVFSEA-006). QC-2 resurvey requirements for small and large SCAs are defined in Section 3.13.6 of this TIP. ***In total, 103 small SCA polygons (defined as being less than or equal to 1,000 square feet in size) were identified on the Seaside MRA (both inside and outside the roadway alignment and utility corridor) and a total of 33 of these small SCA polygons received a DGM QC-2 resurvey equivalent to 32% of the number of small SCAs. Of the 103 small SCA polygons, 70 were identified as being completely or partially outside the roadway alignment and utility corridor.*** ~~A total of 20 small SCA polygons (defined as being less than or equal to 1,000 square feet in size) were identified outside the roadway alignment and utility corridor.~~ ***Of the 70 small SCA polygons identified as being completely or partially outside the roadway alignment and utility corridor, DGM surveys were completed over 69 of them*** for a total area of 0.~~16~~***57*** acre. ***Of the 69 small SCA polygons, 18 received a DGM QC-2 resurvey for a total area of 0.17 acre, equivalent to 30% of the total area of small SCA polygons located completely or partially outside the roadway alignment and utility corridor (for the small SCA polygons that were located partially outside the roadway alignment and utility corridor, some of the QC-2 DGM resurvey was conducted within the portion of the SCA located inside the roadway alignment or utility corridor; therefore, Table 4-2 shows the acreage of DGM QC-2 survey conducted both inside and outside the roadway alignment or utility corridor).*** A total of ~~55~~***59*** large SCA polygons (defined as being greater than 1,000 square feet) were identified as being either partially or completely outside the roadway alignment and utility corridor for a total area of approximately 21.9 acres. ~~In accordance with the revised QC-2 process, the 20 small SCA polygons received a DGM QC-2 resurvey over all or a potion of each SCA for a total area of 0.15 acre, equivalent to 94% of the total area of small SCA polygons located partially or entirely outside the roadway alignment and utility corridor.~~ ~~For the 55~~ ***For the 59*** large SCA polygons, at least 10% of the surface area of the large SCA polygons received a QC-2 DGM resurvey. ~~This percentage includes SCA polygons with portions located within the roadway alignment and/or utility corridor.~~ In many cases, the large SCA polygons received a DGM resurvey over greater than 10% of the surface area. A total of 4.6 acres of the large SCA polygons ***located outside of the roadway alignment and utility corridor*** received a DGM resurvey, equivalent to 21% of the total large polygon SCA acreage. ***Table 4-***

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		2 summarizes the QC-2 results for the SCAs located completely or partially outside the roadway alignment and utility corridor. Appendix J includes a table that provides the QC-2 results for all SCA polygons located in the Seaside MRA. Figures 4-5 through 4-8 show the QC-2 DGM areas ***located outside the roadway alignment and utility corridor.***"
6	Specific Comment p.2-6. Section 2.4.2 Seaside MRA Investigation and Removal Activities Inside Roadway Alignment and Utility Corridor	**Comment:** The second to the last paragraph notes that a total of 21 MEC items were removed during the work within the roadway alignment and utility corridor. However, the number reported in the *Final Technical information paper Phase II Seaside MRA Inside Roadway Alignment and Utility Corridor* was 22. Please review the information and update the text as necessary. **Response:** The text has been revised as follows: "In total, 111 SCA points and 78 SCA polygons or portions of polygons were investigated as part of the work conducted inside the roadway alignment and utility corridor. A total of ~~21~~***22*** MEC items, 208 pounds (lbs) of munitions debris (MD), and more than 6,000 lbs of cultural debris were removed as part of the investigation and removal action activities. Of the ~~21~~***22*** MEC items, six items were recovered during the roadway clearing and grubbing activities, ~~11~~ ***12*** items were recovered during soil sifting operations (as stated above, the soil scraped from the SCA polygons located within the roadway and utility corridor was not segregated from the soil scraped from the SCA polygons that are the subject of this TIP), and four items were recovered during intrusive investigations of targets identified during digital geophysical mapping (DGM) surveys."

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1	General	**Comment:** • The Glossary has an outdated definition of the term "Material Potentially Presenting an Explosive Hazard (MPPEH)." The current definition may be found in DoDM 6055.09-M-Ve (Department of Defense Ammunition and Explosives Safety Standards 6055.09-M, Volume 8, Glossary, February 29, 2008 [Administratively Reissued August 4, 2010]). It should be noted that the current version of the MPPEH definition results in MPPEH becoming either MDAS or MDEH (material documented as safe, or material documented as and explosive hazard, respectively) after it is inspected. It should also be noted that my MPPEH released to a disposal contractor must be determined to be MDAS In addition, not all of the definitions in the Glossary are arranged in Alphabetical order (i.e., Potential Explosion Site [PES], Small Arms Ammunitions [SAA], and ESCA RP Team), which could result in definitions being missed during a search of the Glossary • The use of the term "buried" to describe items that are present under the surface of the soil and which did not arrive there by intentional burial may cause confusion as to what the item is. For example, if you intentionally bury a munition as a disposal action, it becomes a discarded military munition (DMM) that is a Resource Conservation and Recovery Act (RCRA solid waste per the Military Munitions Rule (40 CFR 266). It would be more appropriate to use the term "buried" only in reference to items intentionally placed under the surface of the soil for disposal/abandonments, and to use the term "subsurface: for all items that arrived there due to normal use and unintentional occurrences (e.g., erosion). • The munitions identified as "Stokes Mortars" are inconsistently identified at a number of locations in the document. Examples of the terminology variants are as follows: o The document identifies Stokes Mortars as a type using three terms – "Stokes Mortars," "Stokes Trench Mortars," and "Stokes projectiles." o The format and nomenclature variants used to identify the Stokes Mortars in the document include "Projectile, 3-inch, trench mortar, practice, MK I (Stokes), "4-inch practice Stokes smoke projectile" (Note; although the 4-inch projectile described here, if it actually is a practice projectile, emits smoke when it functions, it is not classed as a "smoke projectile, which is a separate category. The correct type description should be determined and applied here.);

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		"Projectile, 4-inch, mortar, screening smoke, FM (Stokes);" "Projectile, 4-inch, mortar, smoke, HC (Stokes);" "Projectile, 4-inch, trench mortar, practice, MK I (Stokes and "Projectile, 4-inch, trench mortar, smoke, white phosphorous, MK I (Stokes)." Although it is recognized that the format for the narrative presentation and the tabular listing may of necessity differ, multiple titles for the same munition in each format should be eliminated where possible to prevent potential confusion. It is conceded that the nomenclature in Table 2-1, Historical Types of MEC Removed, is the result of verbatim extraction from other sources, as is duly noted in the footnote to the table. However, there is no logical reason to perpetuate easily identifiable conflicts, and these should be corrected (i.e., such as decide on a standard term for the Stokes Mortar [either Stokes Mortar or Stokes Trench Mortar] and use it throughout the Draft TIP SS ORA&UX [PR&RAAR]). Please decide on a standard tabular format and use it in all tables in the document (i.e., item name, item size, item type, item model [examples: "Stokes Mortar, 4-inch, Practice, MK I" or "Projectile, 4-inch Stokes Mortar, Practice, MKI"]) **Response:** • The definition of the term "Material Potentially Presenting an Explosive Hazard (MPPEH) has been corrected to reflect the current definition found in DoD 6055.09-M-V8, Volume, 8 Glossary, February 29, 2008 (Administratively Reissued August 4, 2010). • Where applicable, the term "buried" has been changed to "subsurface." • When referring to the item in question, in general context the text has been standardized to read "Stokes Mortar". However when the item in question is in reference to a particular type of Stokes Mortar, i.e., Projectile 4-inch, mortar, screening smoke; Projectile, 4-inch, mortar, smoke HC etc., the text will reflect the particular item in question. Table 2-1 is pulled directly from the MMRP Database and will not be changed at this time.
2	General	**Comment:** The Draft TIP SS ORA&UC (PP&RAAR) contains Section 6.0, Conclusions and Recommendations. However, a review of this section revealed a number of logical conclusions, but no recommendations were presented. Please review this section and revise its contents or its title to reflect the noted situation present therein.

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		Response: The following text has been added to the end of Section 6.0: ***"Based upon the results of the removal action, no further removal activities are recommended for the Phase II, Seaside Munitions Response Area, Outside Roadway Alignment and Utility Corridor. The Group 1 RI/FS report will evaluate the remaining explosive risks and the work completed at the Seaside MRA. This evaluation will consider the future reuse of the Seaside MRA."***
1	Specific Pg. 2-3, Section 2.3, Site History	**Comment:** The second paragraph of this section states that, "The Seaside MRA contained the former firing points and some of the former targets associated with the following military activities: • Small arms ammunition (SAA) training-Ranges 18, 19, 20, 21, 22, 23, and 46 and Historical Area 59 • Non-firing target range training – Old Range 22 and Range 23M • Mortar and antitank training – Range 48 • Booby trap training – Historical Area 50 While it is understood that the area may have contained firing points for the activities noted in the first and third bullets, it is unclear as to why a non-firing activity as listed in the second bullet would have a firing point. The "Booby trap training" site should not have a firing point or targets as such. Please revise the cited paragraph to eliminate the potential confusion that may result if it remains as it is currently constructed. **Response:** The second paragraph of Section 2.3 has been revised as follows: "By 1945, the Army established 18 firing ranges and training sites within the boundaries of the 8,000-acre former impact area. The Seaside MRA lies on the westernmost part of the former impact area. The Seaside MRA contained ~~the former firing points and some of the former targets~~ ***former training sites*** associated with the following military activities: • Small arms ammunition (SAA) training - Ranges 18, 19, 20, 21, 22, 23, and 46 and Historical Area 59 • Non-firing target range training - Old Range 22 and Range 23M • Mortar and antitank training - Range 48 • Booby trap training - Historical Area 50

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		According to the known configuration of the ranges, weapons were fired to the east and southeast from ~~these firing points~~ ***the SAA training Ranges 18,19,20,21,23, and 46 and Historical Area 59, and the mortar and antitank training Range 48 area,*** toward the center of the impact area. It is expected that munitions activity associated with these ranges would have occurred at, or in the general vicinity of, the firing points. To facilitate previous MEC investigations and removal activities, these locations were divided into four MRSs, MRS-15SEA.1 through MRS-15SEA.4. The boundaries of each of these MRSs are shown on Figure 1-2."
2	Specific Pg. 3-2 Section 3.2 Recategorization of the Special Case Areas	The second paragraph of this section states that, "The SCA point locations were identified as discrete Global Positioning System (GPS) coordinates provided by the Army and were renumbered 1 through 534 (422 of these locations were located outside the roadway alignment and the utility corridor)." This same 422 number is repeated in the first page 3-4 paragraph of Section 3.3, General Approach. However, Table 3-1, SCA point l Locations Outside Roadway Alignment and Utility Corridor, list 535 points. In addition, the same paragraph of Section 3.3 notes that, Table 3-2 lists the 137 SCA polygon locations located either entirely or partially outside the roadway alignment and utility corridor." However, the actual number of listings in the cited table is 134. Please review these discrepancies and correct or explain them. **Response:** To clarify the total number of SCA points, a table has been added to Appendix A listing the total number of SCA points in the Seaside MRA and highlighting the points located outside the roadway and utility corridor. Please note that no point was numbered 435. Therefore, the total number of SCA points at the Seaside MRA is 534. Of these 534 points, 423 points were located outside the roadway alignment and utility corridor and are the subject of this report. The text has been revised to reflect the correct number of SCA points in the appropriate sections of the report. Similarly, a table has been added to Appendix B, which identifies the total number of SCA polygons on the Seaside MRA and highlights the SCA polygons located completely or partially outside the roadway and utility corridor. A total of 167 SCA polygons were identified in the Seaside MRA. Of these 167 polygons, a total of 129 were located either completely or partially outside the roadway and utility corridor. The text has been revised

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		to reflect the correct number of SCA polygons in the appropriate sections of the report.
3	Specific Pg. 3-7, Section 3.9, Oversized Material	**Comment:** The third paragraph of this section states that, "On august 11, 2008, an aluminum 40mm M407 A1 Practice projectile was found during spreading of the material by the Army." It is true that the outer covering of this projectile is aluminum. However, the most prevalent material present in the 170-gram projectile is the 84 grams of a phenolic resin in the ball of the 110-gram ball and skirt assembly that is internal to the projectile. In addition, the projectile contains additional components that include approximately 14.5 grams of steel and approximately 3.5 grams of brass. Small less-than-gram amounts of other materials are included in the item As the cited statement might result in the mistaken belief that the projectile was constructed wholly of aluminum, it should be revised in a manner that reflects that it is aluminum covered or is constructed primarlily of non-ferrous materials with an aluminum covering. It should also be noted that the M407 A1 projectile contains approximately 0.38 grams of high explosives. Please revise section 3.9 to reflect this information and revise all references to the M407 A1 projectile that might infer that it is constructed only of aluminum. **Response:** The following text was added to Section 3.9: "On August 11, 2008, ~~an aluminum~~ ***a non-ferrous*** 40mm M407 A1 practice projectile ***with an aluminum cover*** was found during spreading of the material by the Army."
4	Specific Pg. 3-19 Section 3.10.5, Excavation of DGM Anomalies	**Comment:** The first paragraph of this section ends with a statement that, "The following nomenclature was used to categorize the items discovered by the dig teams." It then lists Unexploded Ordnance (UXO), Discarded Military Munitions (DMM), Munitions Constituents (MC), Munitions Debris (MD), Cultural Debris, and No Contact (NC) as the subject nomenclature. Definitions of each of these terms are provided. However, the definitions of DMM and MD differ from the definitions provided in the Glossary section of the Draft TIP SS ORA&UC (PR&RAAR). Please correct the definitions in Section 3.10.5 to comply with those provided in the glossary or include a notation in Section 3.10.5 that explains that these are abbreviated definitions and do not match the official Department of Defense definitions (Note: The modified definition of MD includes the work Shrapnel." If this is included to specify components of Shrapnel munitions, the use is correct. However, if this is the common misuse of the word (perpetuated in non-

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		technical dictionaries) to describe fragments from non-Shrapnel munitions, it should be removed from the abbreviated definition.) **Response:** The definition of DMM was adjusted to comply with the definition provided in the glossary: ***"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 UXO, 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))"*** The definition of MD was adjusted to comply with the definition provided in the glossary: ***"Remnants of munitions (e.g., fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal."***
5	Specific Fig. 3-13 Location of Sifting Plant Operations and Air Monitoring Detectors	**Comment:** The legend of the figure displays a red line that is identifies as the "1127-Foot Exclusion Zone Boundary." However, the figure displays two concentric red circles that appear to represent the 1127-foot boundary, which would seem to be impossible. Please review the cited circles and either correct the figure or provide an explanation as to why the two concentric circles both represent a 1127-foot distance from the same location. **Response:** Figure 3-13 has been revised to display only one "1,127-Foot Exclusion Zone Boundary."

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

REPLY TO
ATTENTION OF

November 8, 2010

Fort Ord BRAC Field Office

Stan Cook
ESCA Remediation Program Manager
Fort Ord Reuse Authority
100 12th Street, Building 2880
Marina, CA 93933

Subject: *Draft Technical Information Paper Phase II Seaside Munitions Response Area (MRA) Outside Roadway Alignment and Utility Corridor*, dated October 18, 2010, received on October 20, 2010.

Dear Mr. Cook:

Thank you for an opportunity to review and comment on the subject document. We also appreciate clarifications provided during a conference call with the ESCA Remediation Program Team on November 3, 2010. The Army's comments are enclosed. 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

Enclosure

DRAFT Technical Information Paper Phase II Seaside Munitions Response Area (MRA) Outside Roadway Alignment and Utility Corridor

October 18, 2010

Army Comments:

1. p. 3-2. Section 3.2 Recategorization of the Special Case Areas. The section describes how the SCAs were categorized by type.
    - Berms – The second bullet on this page describes that berms prevented geophysical surveys from being completed in their vicinity, and that eight berms were identified in the site, outside the roadway alignment and utility corridor. However, the report does not describe what work was done to complete the removal action in these areas. Table 3-1, SCA Point Locations Outside Roadway Alignment and Utility Corridor lists more than eight SCA points described as "berm." Please update the report to clarify.
    - Structures – The second to the last bullet indicates five range structures and seven field latrines were identified outside the roadway alignment and utility corridor. It also suggests that removal of these structures were necessary in order to conduct geophysical surveys. However, the report does not provide information that shows that these buildings were in fact removed. Please describe this work in a relevant section of the document for completeness.
    - Debris Piles – The last bullet indicates that several debris piles were identified in the site, outside the roadway alignment and utility corridor. However, the report does not describe subsequent actions to address the debris piles. It is noted *Final Technical Information Paper Phase II Seaside MRA Inside Roadway Alignment and Utility Corridor*, dated September 26, 2008, describes that debris piles from the entire Seaside MRA were inspected for potential presence of MEC, segregated and disposed. Please include this information in a relevant section of this document for completeness.

2. p.3-21. Section 3.10.6.1 SCA_W140. The section refers to "the existing GJMB, which is still in use" as the reason for leaving some fence posts in place. Please consider modifying the description as it could be confusing once the new, realigned GJMB is opened for use.

3. p.3-22. Section 3.11.2 Explosive Storage. The section describes that a government-supplied explosives storage facilities are being used by the ESCA team in accordance with an approved explosives safety submission and a Right of Entry. Please consider, for clarification, modifying the sentence since this arrangement is no longer being utilized.

4. Table 4-2 Summary of QC-2 Survey Results. The modified QC-2 process for the project included: 100% QC-2 resurvey coverage in 30% of small SCAs and 10% QC-2 resurvey coverage in all of the large SCAs. However, the table shows the QC-2 coverage was smaller in some instances. It might be possible that the coverage was not correctly identified for SCA polygons that overlap the roadway alignment or the utility corridor. Please review the table and update it if necessary.

5. p.4-6 Section 4.3.6.2 QC-2, 20 small SCA polygons and 55 large SCA polygons are noted as being either partially or completely outside the roadway alignment and utility corridor. However, on p. 3-2 of the document, the total number of such polygons is 137. Please review the information and text, and update these sections as necessary.

6. p.2-6. Section 2.4.2 Seaside MRA Investigation and Removal Activities Inside Roadway Alignment and Utility Corridor. The second to the last paragraph notes that a total of 21 MEC items were removed during the work within the roadway alignment and utility corridor. However, the number reported in *Final Technical Information Paper Phase II Seaside MRA Inside Roadway Alignment and Utility Corridor* was 22. Please review the information and update the text as necessary.

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

December 20, 2010

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

Re: Draft Technical Information Paper, Phase II Seaside Munitions Response Area Outside Roadway Alignment and Utility Corridor (Pollution Report and Removal Action Activity Report), Former Fort Ord, Monterey, California, dated October 18, 2010

Dear Stan:

Attached are EPA comments on the *Draft Technical Information Paper, Phase II Seaside Munitions Response Area Outside Roadway Alignment and Utility Corridor (Pollution Report and Removal Action Activity Report), Former Fort Ord, Monterey, California*, dated October 18, 2010.

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,

Judy C. Huang
Remedial Project Manager

cc:

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Review Of The
Fort Ord Reuse Authority (FORA)
Draft Technical Information Paper
Seaside Munitions Response Area
Outside Roadway Alignment and Utility Corridor
(Pollution Report and Removal Action Activity Report)

Former Fort Ord, California
October 18, 2010

GENERAL COMMENTS

1. The Fort Ord Reuse Authority (FORA) Draft Technical Information Paper, Phase II Seaside Munitions Response Area Outside Roadway Alignment and Utility Corridor (Pollution Report and Removal Action Activity Report), Former Fort Ord, Monterey, California, dated October 18, 2010 (hereinafter referred to as the Draft TIP SS ORA&UC [PR&RAAR]), has some minor terminology issues that may affect the understanding of the information presented. These include:

- The Glossary has an outdated definition of the term "Material Potentially Presenting an Explosive Hazard (MPPEH)." The current definition may be found in DoDM 6055.09-M-V8 (Department of Defense Ammunition and Explosives Safety Standards 6055.09-M, Volume 8, Glossary, February 29, 2008 [Administratively Reissued August 4, 2010]). It should be noted that the current version of the MPPEH definition results in MPPEH becoming either MDAS or MDEH (material documented as safe, or material documented as an explosive hazard, respectively) after it is inspected. It should also be noted that any MPPEH released to a disposal contractor must be determined to be MDAS.

  In addition, not all of the definitions in the Glossary are arranged in alphabetical order (i.e., Potential Explosion Site [PES], Small Arms Ammunition [SAA], and ESCA RP Team), which could result in definitions being missed during a search of the Glossary.

- The use of the term "buried" to describe items that are present under the surface of the soil and which did not arrive there by intentional burial may cause confusion as to what the item is. For example, if you intentionally bury a munition as a disposal action, it becomes a discarded military munition (DMM) that is a Resource Conservation and Recovery Act (RCRA) solid waste per the Military Munitions Rule (40 CFR 266). It would be more appropriate to use the term "buried" only in reference to items intentionally placed under the surface of the soil for disposal/abandonment, and to use the term "subsurface" for all items that arrived there due to normal use and unintentional occurrences (e.g., erosion).

- The munitions identified as "Stokes Mortars" are inconsistently identified at a number of locations in the document. Examples of the terminology variants are as follows:

- The document identifies Stokes Mortars as a type using three terms - "Stokes Mortars," "Stokes Trench Mortars," and "Stokes projectiles."
- The format and nomenclature variants used to identify the Stokes Mortars in the document include "Projectile, 3-inch, trench mortar, practice, MK I (Stokes);" "4-inch practice Stokes smoke projectile" (Note; although the 4-inch projectile described here, if it actually is a practice projectile, emits smoke when it functions, it is not classed as a "smoke" projectile, which is a separate category. The correct type description should be determined and applied here.); "Projectile, 4-inch, mortar, screening smoke, FM (Stokes);" "Projectile, 4-inch, mortar, smoke, HC (Stokes);" "Projectile, 4-inch, trench mortar, practice, MK I (Stokes);" and "Projectile, 4-inch, trench mortar, smoke, white phosphorous, MK I (Stokes)."

Although it is recognized that the format for the narrative presentation and the tabular listing may of necessity differ, multiple titles for the same munition in each format should be eliminated where possible to prevent potential confusion. It is conceded that the nomenclature in Table 2-1, Historical Types of MEC Removed, is the result of verbatim extraction from other sources, as is duly noted in the footnote to the table. However, there is no logical reason to perpetuate easily identifiable conflicts, and these should be corrected (i.e., such as decide on a standard term for the Stokes Mortar [either Stokes Mortar or Stokes Trench Mortar] and use it throughout the Draft TIP SS ORA&UC [PR&RAAR]). Please decide on a standard tabular format and use it in all tables in the document (i.e., item name, item size, item type, item model [examples: "Stokes Mortar, 4-inch, Practice, MK I" or "Projectile, 4-inch Stokes Mortar, Practice, MK I"]).

Please review the noted concerns and correct them as appropriate.

2. The Draft TIP SS ORA&UC (PR&RAAR) contains Section 6.0, Conclusions and Recommendations. However, a review of this section revealed a number of logical conclusions, but no recommendations were presented. Please review this section and revise its contents or its title to reflect the noted situation present therein.

SPECIFIC COMMENTS

1. Section 2.3, Site History, Page 2-3: The second paragraph of this section states that, "The Seaside MRA contained the former firing points and some of the former targets associated with the following military activities:

- Small arms ammunition (SAA) training - Ranges 18, 19, 20, 21, 22, 23, and 46 and Historical Area 59
- Non-firing target range training - Old Range 22 and Range 23M
- Mortar and antitank training - Range 48
- Booby trap training - Historical Area 50"

While it is understood that the area may have contained firing points for the activities noted in the first and third bullets, it is unclear as to why a non-firing activity as listed in

the second bullet would have a firing point. The "Booby trap training" site should not have a firing point or targets as such. Please revise the cited paragraph to eliminate the potential confusion that may result if it remains as it is currently constructed.

2. **Section 3.2, Recategorization of the Special Case Areas, Page 3-2:** The second paragraph of this section states that, "The SCA point locations were identified as discrete Global Positioning System (GPS) coordinates provided by the Army and were renumbered 1 through 534 (422 of these locations were located outside the roadway alignment and the utility corridor)." This same 422 number is repeated in the first page 3-4 paragraph of Section 3.3, General Approach. However, Table 3-1, SCA Point Locations Outside Roadway Alignment and Utility Corridor, lists 535 points.

   In addition, the same paragraph of Section 3.3 notes that, "Table 3-2 lists the 137 SCA polygon locations located either entirely or partially outside the roadway alignment and utility corridor." However, the actual number of listings in the cited table is 134.

   Please review these discrepancies and correct or explain them.

3. **Section 3.9, Oversized Material, Page 3-14:** The third paragraph of this section states that, "On August 11, 2008, an aluminum 40mm M407 A1 practice projectile was found during spreading of the material by the Army." It is true that the outer covering of this projectile is aluminum. However, the most prevalent material present in the 170-gram projectile is the 84 grams of a phenolic resin in the ball of the 110-gram ball and skirt assembly that is internal to the projectile. In addition, the projectile contains additional components that include approximately 14.5 grams of steel and approximately 3.5 grams of brass. Small less-than-gram amounts of other materials are included in the item.

   As the cited statement might result in the mistaken belief that the projectile was constructed wholly of aluminum, it should be revised in a manner that reflects that it is aluminum covered or is constructed primarily of non-ferrous materials with an aluminum covering. It should also be noted that the M407 A1 projectile contains approximately 0.38 grams of high explosives. Please revise Section 3.9 to reflect this information and revise all references to the M407 A1 projectile that might infer that it is constructed only of aluminum.

4. **Section 3.10.5, Excavation of DGM Anomalies, Page 3-19:** The first paragraph of this section ends with a statement that, "The following nomenclature was used to categorize the items discovered by the dig teams." It then lists Unexploded Ordnance (UXO), Discarded Military Munitions (DMM), Munitions Constituents (MC), Munitions Debris (MD), Cultural Debris, and No Contact (NC) as the subject nomenclature. Definitions of each of these terms are provided. However, the definitions of DMM and MD differ from the definitions provided in the Glossary section of the Draft TIP SS ORA&UC (PR&RAAR). Please correct the definitions in Section 3.10.5 to comply with those provided in the glossary or include a notation in Section 3.10.5 that explains that these are abbreviated definitions and do not match the official Department of Defense definitions. (Note: The modified definition of MD includes the word "shrapnel." If this is included to specify components of Shrapnel munitions, the use is correct. However, if this is the common misuse of the word (perpetuated in non-technical dictionaries) to

describe fragments from non-Shrapnel munitions, it should be removed from the abbreviated definition.)

5. **Figure 3-13, Location of Sifting Plant Operations and Air Monitoring Detectors:** The legend of the figure displays a red line that is identified as the "1127-Foot Exclusion Zone Boundary." However, the figure displays two concentric red circles that appear to represent the 1127-foot boundary, which would seem to be impossible. Please review the cited circles and either correct the figure or provide an explanation as to why the two concentric circles both represent a 1127-foot distance from the same location.