

**Response to Comments**  
**DRAFT Technical Information Paper Parker Flats Munitions Response Area Phase II,**  
**dated September 21, 2012**  
**Review comments provided by Judy Huang of EPA, dated November 20, 2012**

| No. | Comment Type / Report Section | Comment/Response   |
|-----|-------------------------------|--|
| 1   | General                       | <p><b>Comment:</b></p> <p>The Fort Ord Reuse Authority (FORA) Environmental Services Cooperative Agreement (ESCA) Draft Technical Information Paper, Parker Flats Munitions Response Area (MRA) Phase II, Former Fort Ord, Monterey County, California, dated September 21, 2012 (hereinafter referred to as the Draft TIP PF MRA Phase II), presents a somewhat confusing identification of the munitions and explosives of concern recovered during the project execution.</p> <p>The total number of MEC and its sub-elements of DMM and UXO found during the Phase II activities is listed in Section 5.0 (MEC Investigation Results) as 1,042, 1,034, and 8, respectively. This is listed consistently in Table 5.1 (Parker Flats MRA Phase II MEC and MD Recovered). However, Section 6.0 (Conclusions) lists the total MEC recovered as 1,044 instead of the 1,042 shown in the cited section and table. Please revise the noted portions of the Draft TIP PF MRA Phase II to present a consistent total number of MEC recovered.</p> <p>Please review each of the listed statements and revise them as necessary to present the same basis and qualifying statements for the conclusion presented. If there is an underlying reason for the statements to vary, please provide that information to the EPA.</p> <p><b>Response:</b></p> <p>The listed statements summarizing the physical finds in Section 5.0 have been reviewed. One discrepancy was found between the small arms ammunition (SAA) items recorded in Section 5.3.1 DGM Survey Investigation Results and Table 5-1 Parker Flats MRA Phase II MEC and MD Recovered. Therefore, the bullet summarizing the SAA in Section 5.3.1 has been revised as follows:</p> <ul style="list-style-type: none"> <li>• <del>10995</del> SAA items</li> </ul> <p>The Executive Summary and Section 6.0 Conclusions have been revised to be consistent with Section 5.0 MEC Investigation Results and Table 5-1 Parker Flats MRA Phase II MEC and MD Recovered as follows:</p> <ul style="list-style-type: none"> <li>• <del>1,044</del><b>1,042</b> MEC items</li> <li>• <del>approximately 4,400</del> <b>4,093</b> lbs of MD</li> </ul> |

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|     |  | <ul style="list-style-type: none"> <li>• <del>approximately 358,100</del><b>38,086</b> SAA items</li> <li>• <del>approximately 173,100</del><b>173,096</b> lbs of other debris</li> </ul>   |
| 1   | Specific, Acronyms and Abbreviations, Page vii                   | <p><b>Comment:</b></p> <p>The definition of “EOD” reads “Explosives Ordnance Disposal.” The correct definition is “Explosive Ordnance Disposal.” Please correct the cited definition.</p> <p><b>Response:</b></p> <p>The definition of “EOD” has been corrected.</p>  |
| 2   | Specific, Section 2.2.3, Surface Water and Groundwater, Page 2-2 | <p><b>Comments:</b></p> <p>This section states that, “One known groundwater monitoring well is located in the northwestern portion of the Parker Flats MRA Phase I, and two groundwater monitoring wells are located northwest of the Parker Flats MRA.” Please explain the intent of the word “known” with respect to the identification of the first well and its absence from the reference to the two other wells.</p> <p><b>Response:</b></p> <p>The sentence has been revised as follows:</p> <p>“One <del>known</del> groundwater monitoring well is located in the northwestern portion of the Parker Flats MRA Phase I, and two groundwater monitoring wells are located northwest of the Parker Flats MRA.”</p>   |
| 3   | Specific, Section 2.3, Site History, Page 2-3                    | <p><b>Comment:</b></p> <p>This section notes that, “The former Fort Ord was used to train Army infantry, cavalry, and field artillery units until formal closure in 1993. In support of the training of soldiers, military munitions were used at the ranges throughout the former Fort Ord. As a result of the training activities, a wide variety of conventional MEC (related to infantry and artillery training) have been encountered in areas throughout the former Fort Ord.”</p> <p>It is unclear why the training noted includes “...Army infantry, cavalry, and field artillery units...” but the MEC recovered is only stated as being “...related to infantry and artillery training...” As the cavalry units were trained to function in combat using most of the same weapons used by the infantry, it is questionable that none of the MEC found was determined to</p> |

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|     |  | <p>be related to the cavalry training.</p> <p>Please review the noted section and revise it as necessary to resolve the discrepancy noted.</p> <p><b>Response:</b></p> <p>The cited section, first paragraph, has been revised as follows:</p> <p style="padding-left: 40px;">“...As a result of the training activities, a wide variety of conventional MEC (<del>related to infantry and artillery training</del>) have been encountered in areas throughout the former Fort Ord. The MEC encountered at the former Fort Ord have been either unexploded ordnance (UXO) or discarded military munitions (DMM).”</p>   |
| 4   | Specific, Section 2.4, Previous MEC Investigations and Removal Actions, Page 2-3 and 2-4 | <p><b>Comment:</b></p> <p>The listing of the removal actions presented in the 8<sup>th</sup> through 14<sup>th</sup> bullets of this section all provide either the depth of removal or state that the removal was a surface removal. However, the two removal actions listed on the 15<sup>th</sup> and 16<sup>th</sup> bullets do not state the removal depth. Please correct this omission. If the removal was to depth of detection, please so state.</p> <p><b>Response:</b></p> <p>The 15<sup>th</sup> and 16<sup>th</sup> bullets have been revised as follows:</p> <ul style="list-style-type: none"> <li>• Non-time critical removal action (Phase 1) <i>to depth of detection</i> at MRS-15 MOCO.02 in 2003 (Parsons 2004)</li> <li>• Non-time critical removal action (Phase 2) <i>to depth of detection</i> at MRS-15 MOCO.02 in 2005 (Parsons 2006)</li> </ul> |
| 5   | Specific, Section 3.1, Extent of MEC Remedial Investigation Activities, Page 3-1         | <p><b>Comment:</b></p> <p>This section states that, “Improved roads were not intrusively investigated.” However, Section 3.2, General Approach, states in the first black bullet on page 3-2 that, “In addition, the roads and trails, including 5-foot buffer areas, within the habitat reserve area were investigated using DGM.” Further confusion is added by the statement in the next to last paragraph of Section 5.2.1 (DGM Survey Investigation Results), where it is noted that, “Along the gravel improved dirt road in the southern non-residential development area of Parcels E18.1.1 and E18.1.2, a total of 424 targets locations were identified by the project geophysicist.”</p>   |

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|     |  | <p>To avoid potential misinterpretation of these statements and the resulting confusion as to what constitutes an “improved road,” please define the term and indicate that the roads that were digitally investigated were not ‘improved roads.’ If this is not the case, please revise all statements concerning “improved roads” to ensure that they are consistent.</p> <p><b>Response:</b></p> <p>The term “improved roads” in this document refers to roads that have been paved with asphalt; therefore, the following information has been added to the document where the term has been used:</p> <p style="padding-left: 40px;">“Improved roads (<i>i.e., consisting of asphalt pavement</i>) were not intrusively investigated.”</p> <p>References to other roads, which consist of either gravel or dirt material, in this document have been revised for clarification as provided in the following examples:</p> <p style="padding-left: 40px;">“In addition, <i>unpaved</i> roads and trails, including 5-foot buffer areas, within the habitat reserve area were investigated using DGM.”</p> <p style="padding-left: 40px;">“Along the <del>gravel improved dirt</del> <i>unpaved</i> road in the southern non-residential development area of Parcels E18.1.1 and E18.1.2, a total of 424 target locations were identified by the project geophysicist.”</p> |
| 6   | Specific, Section 3.4.1.2, EM61-Mk2 Cart, Page 3-7 | <p><b>Comment:</b></p> <p>It is noted here that, “The operating height of the manually towed single-array EM61-MK2 cart was either 16 inches or 7.9 inches above ground surface depending on site conditions such as terrain or vegetation.” No statement is presented indicating any effect this change in instrument height may have had on the digital geophysical mapping (DGM) results. Please provide a statement identifying that effect, or include a statement that none occurred.</p> <p><b>Response:</b></p> <p>In Section 3.4.5 Digital Geophysical Mapping Surveys, first solid bullet, third sentence, the following statement is provided to describe the</p>   |

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|     |  | <p>procedural modification (i.e., effect) of using the EM61-MK2 cart at a 16-inch coil height, which was lowering the target selection threshold from 20mV to 3mV:</p> <p style="padding-left: 40px;">“For the 1.2 acres where the 16-inch coil height was used the targets were selected at a 3mV stacked (i.e., summed) channel response.”</p> <p>Operating the EM61-MK2 cart at a 16-inch coil height with a lowered target selection threshold did not impact the quality of the DGM survey results. For clarification, the following sentence has been added to the second paragraph of Section 3.4.1.2:</p> <p style="text-align: center;"><i>“Information on the DGM survey procedures with the EM61-MK2 cart is provided in Section 3.4.5.”</i></p>  |
| 7   | Specific, Section 3.7, MD Recycling, Page 3-20 | <p><b>Comment:</b></p> <p>This section indicates that, “Following completion of MEC remedial investigation in the Parker Flats MRA Phase II, MD will be disposed of at a foundry or recycler where it will be processed through a smelter, shredder, or furnace prior to resale or release. Disposal in a landfill or to a scrap dealer where it may sit in a scrap pile is not approved. Recovered MD is secured in lockable containers after discovery and the containers will remain locked until they are delivered to and signed for by a foundry and/or recycler.”</p> <p>This does not present the current process for disposing of items determined to be MD in the terms used in DoDM 6055.09-M, V7, Enclosure 6 (Department of Defense Ammunition and Explosives Safety Standards, Volume 7, Criteria for Unexploded Ordnance, Munitions Response, Waste Military Munitions, and Material Potentially Presenting an Explosive Hazard; Enclosure 6, Material Potentially Presenting an Explosive Hazard [MPPEH]). That document prescribes the following concerning MD, which is classified as MPPEH until it is processed as follows and is placed under evidentiary control:</p> <p>“Prior to its transfer within the Department of Defense or release from DoD control, personnel certified by the responsible authority (e.g., installation commander) as technically qualified to act as signatories in determining the materials explosives safety status shall determine in writing the material’s characterization as safe (i.e., material documented as safe [MDAS]) or explosively hazardous (i.e., material documented as an</p> |

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|     |   | <p>explosive hazard [MDEH]) is proper...”</p> <p>“Containers and holding areas for material being processed shall be secured and clearly marked as to the explosive hazard, if any that may be present. MPPEH processing shall be managed in a manner (see definition of “chain of custody” in Volume 8 of this Manual) that prevents:</p> <ul style="list-style-type: none"> <li>• MDEH from being commingled with MPPEH or MDAS.</li> <li>• MDEH from being misidentified, as MPPEH or MDAS once the explosive hazards it presents have been determined.</li> <li>• MDAS from being commingled with MPPEH or MDEH.</li> <li>• MDAS from being misidentified as MPPEH or MDEH once it has been determined to be safe.”</li> </ul> <p>Please revise the cited section to include the terminology noted above and to express the procedure as noted in the DoD Standard cited.</p> <p><b>Response:</b></p> <p>Section 3.7 has been revised as follows:</p> <p style="padding-left: 40px;">“Following completion of MEC remedial investigation in the Parker Flats MRA Phase II, <i>recovered MD, which has been characterized by the SUXOS and UXOQCS as material documented as safe (MDAS) in accordance with Department of Defense (DOD) standards and free from explosives (FFE) in accordance with the Final Group 1 RI/FS Work Plan,</i> will be disposed of at a foundry or recycler where it will be processed through a smelter, shredder, or furnace prior to resale or release. Disposal in a landfill or to a scrap dealer where it may sit in a scrap pile is not approved. Recovered MD, <i>characterized as MDAS and FFE,</i> is secured in <i>clearly marked</i> lockable containers after discovery <i>to prevent misidentification and potential commingling of materials that have been documented as having an explosive hazard (MDEH) or characterized as potentially having an explosive hazard (i.e., MPPEH) prior to demolition.</i> <del>and</del> The containers will remain locked until they are delivered to and signed for by a foundry and/or recycler.”</p> |
| 8   | Specific, Appendix I, MEC Photographs, Parker Flats | <p><b>Comment:</b></p> <p>The photographs are, in general, fairly good, but the identity of the munitions items is either incomplete, or in some instances, missing completely in a significant number of the photographs. The following are</p>  |

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|     | Phase II                      | <p>examples of these issues:</p> <ul style="list-style-type: none"> <li>• Page 3: There are numerous items displayed on this photograph, but only one nomenclature is provided. Most readers will not be able to identify the item of concern using the nomenclature provided.</li> <li>• Page 4: There are numerous items displayed on this photograph, but only one nomenclature is provided. Most readers will not be able to identify the item of concern using the nomenclature provided.</li> <li>• Page 40: There are a number of items displayed on this photograph. However, no nomenclature is provided for any. Most readers will not be able to identify the items as to type and/or hazards presented.</li> <li>• Page 41: The item displayed appears to be a cartridge misidentified as a projectile.</li> </ul> <p>Please review all of the photographs and ensure that all visible ordnance is correctly identified. If multiple items are present, please provide the nomenclature of each MEC item or MPPEH item of concern. If the item(s) of concern is/are not obvious, please modify the photographs to highlight the item(s) in an appropriate manner (e.g., mark the item with an arrow and its nomenclature or circle it).</p> <p><b>Response:</b></p> <p>MEC photographs have been reviewed and, where applicable, captions have been revised to include identification of all visible ordnance, where applicable and page numbers have been added. In addition, Pages 3, 4, 40, and 41 were revised as follows:</p> <ul style="list-style-type: none"> <li>• Page 3 and page 4: The two photographs have been removed from the appendix because there were numerous munitions items displayed in the photographs and nomenclature for only one munitions item was provided in each photograph. Better examples of the munitions items (i.e., “Simulator, Flash Artillery, M10” and “Squib, Electric”) are displayed in the photograph on Page 34 of 42 of the appendix.</li> <li>• Page 40 (currently Page 37 of 42): The photograph caption has been revised to provide the nomenclature for each items displayed in the photograph.</li> <li>• Page 41 (currently Page 38 of 42): The photograph caption has been revised to “Cartridge, 40mm, HE, M383” in accordance with Army nomenclature for a complete cartridge.</li> </ul> |

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| 1   | Specific, p. xix. Executive Summary | <p><b>Comment:</b></p> <ul style="list-style-type: none"> <li>• Third paragraph states “approximately 482 acres of the Parker Flats MRA Phase II were investigated.” However on page 2-1, Section 2.1 Parker Flats MRA Phase II Location, describes that approximately 426 acres of the 482-acre Phase II area were investigated for the presence of munitions and explosives of concern (MEC). Please check information and update the report as appropriate.</li> <li>• In the bullets that follow, materials recovered during the investigation are summarized, including 1,044 MEC items (same information appears on page 6-1, Section 6.0 Conclusions). However in Table 5-1, Parker Flats MRA Phase II MEC and MD Recovered, 1,034 DMM and 8 UXO items are reported, with a total of 1,042 MEC items. Please check information and update the report as appropriate.</li> </ul> <p><b>Response:</b></p> <p>The third paragraph, first sentence has been revised as follows:</p> <p style="padding-left: 40px;">“Approximately <del>482</del> <b>426</b> acres of the Parker Flats MRA Phase II were investigated <i>by FORA</i> and associated anomalies that potentially represented MEC and <i>munitions debris (MD)</i> were removed. In total, the Phase II MEC remedial investigation <i>conducted by FORA</i> resulted in the recovery of the following:”</p> <p>Section 2.1 (third paragraph) was also revised to reflect the portions of Parker Flats Phase II fieldwork that was conducted by FORA.</p> <p>The bullets for the third paragraph have been revised as follows in coordination with the response to EPA General Comment No. 1:</p> <ul style="list-style-type: none"> <li>• <del>1,044</del>, <b>1,042</b> MEC items</li> <li>• <del>approximately 4,400</del> <b>4,093</b> lbs of MD</li> <li>• <del>approximately 358,100</del> <b>38,086</b> SAA items</li> <li>• <del>approximately 173,100</del> <b>173,096</b> lbs of other debris</li> </ul> |
| 2   | Specific, p. 1-1. Section 1.0       | <p><b>Comment:</b></p> <p>The fourth paragraph notes that the remedial investigation activities</p>  |

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|     | Introduction   | <p>reported in this document occurred between October 2008 and November 2010. However, daily reports in Appendix A indicate brush cutting and digital geophysical anomaly investigation occurred in Parcel E20c.2 in August 2012. The FORA independent quality assurance report for this area, included in Appendix E, is dated July 2010. Please provide a description of the site work that occurred in August 2012.</p> <p><b>Response:</b></p> <p>During the ESCA RP data review process for Parcel E20c.2, it was determined that DGM survey was conducted to the westernmost parcel boundary; however, there was a discrepancy between the westernmost parcel boundary and the parcel boundary GIS layer used by the data processing geophysicist and targets within the area of the discrepancy were not provided on dig lists for investigation. The DGM survey targets were added to a dig list in August 2012 for reacquisition and investigation following brush cutting of vegetation re-growth in the area. Analog survey was also conducted in this area because DGM data could not be obtained due to RTK GPS signal loss caused by tree canopies located off ESCA property.</p> <p>In response, the first sentence of the fourth paragraph has been revised as follows:</p> <p style="padding-left: 40px;">“The activities discussed in this TIP <i>were conducted from</i> <del>began in</del> October 2008 <del>completed in</del> <i>to</i> November 2010 <i>and in August 2012.</i>”</p> <p>Sections 3.0, 3.3 (second paragraph), 3.3.2 (first paragraph), 3.4.5.3 (first paragraph), and 5.3 were also revised to include August 2012.</p> |
| 3   | Specific, p. 2-1. Section 2.1 Parker Flats MRA Phase II Location | <p><b>Comment:</b></p> <p>The fourth paragraph describes the proposed future land uses Phase II area, and cites the 1997 Fort Ord Reuse Plane and the 1995 Site Use Management Plan (SUMP; Administrative Record [AR] number: OE-0006) as primary sources of this information. The 1997 Habitat Management Plan is also cited as part of “other sources of information.” The 1995 SUMP is a document that supports the eventual transfer to the former Impact Area property to the U.S. Department of the Interior (DOI), Bureau of Land Management (BLM), and relied on information available at the time. Since then, Fort Ord Reuse Plan and the HMP were updated (1997), and the <i>Assessment of East Garrison-Parker Flats Land Use</i></p>   |

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|     |  | <p><i>Modification</i> (Zander Associates; AR number BW-1280) was developed in 2002 resulting in a revision to the HMP map. The section would be more complete if the Zander document is also noted, as it was in the Group 1 work plan.</p> <p><b>Response:</b></p> <p>The fourth paragraph, third sentence has been updated to include the reference to the <i>Assessment of East Garrison-Parker Flats Land Use Modification</i> (Zander 2002) as follows:</p> <p style="padding-left: 40px;">“Other sources of future land use information include public benefit conveyance, negotiated sale requests, transfer documents, <del>and</del> the Installation-Wide Multispecies Habitat Management Plan (HMP; USACE, 1997a), <i>and the Assessment East Garrison – Parker Flats Land Use Modifications (Zander 2002).</i>”</p> <p>Section 7.0 References has also been updated to include the Zander 2002 document.</p> |
| 4   | Specific, p. 2-3. Section 2.3 Site History. First Paragraph    | <p><b>Comment:</b></p> <p>Please revise the first sentence to note that Fort Ord was officially closed in 1994.</p> <p><b>Response:</b></p> <p>The first paragraph, first sentence has been revised as follows:</p> <p>“The former Fort Ord was used to train Army infantry, cavalry, and field artillery units until <del>formal</del> <b>official</b> closure in <del>1993</del> <b>1994</b>.”</p>  |
| 5   | Specific, p. 3-3. Section 3.3.2 Vegetation Cutting and Removal | <p><b>Comment:</b></p> <p>The Group 1 work plan, Section 2.3.1.3, stated that vegetation activities would be conducted with oversight of the ESCA RP Team Field Biologist. Please state if the ESCA biologist provided oversight of vegetation cutting activities.</p> <p><b>Response:</b></p> <p>The first paragraph has been revised as follows:</p> <p>“<i>An ESCA RP Biologist oversaw the</i> vegetation cutting and removal</p>   |

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|     |  | activities in support of DGM and analog surveys within the Parker Flats MRA Phase II work areas..."  |
| 6   | Specific, p. 3-13. Section 3.4.5 Digital Geophysical Mapping Surveys   | <p><b>Comment:</b></p> <p>The fifth paragraph discusses DGM investigations conducted in six specific types of areas. The first bullet describes a 1.7-acre tree-covered area. Fourth and fifth bullets describe a gravel improved dirt road and a portion of a berm in a future residential reuse area. Suggestion to update the referenced figures to more clearly communicate the locations and sizes of these areas. In the third bullet, the figure reference should be to Figure 3-3.</p> <p><b>Response:</b></p> <p>Figure 3-3 has been revised to more clearly identify the locations and sizes of the tree-covered area, the unpaved road, and the future residential reuse area berm.</p> <p>The figure reference in the third bullet has been revised to Figure 3-3.</p>   |
| 7   | Specific, p. 3-18. Section 3.4.7 Analog Instrument-Aided Surface and Near-Surface Investigation of Habitat Areas | <p><b>Comment:</b></p> <p>Second paragraph describes that "methods similar to those described in Section 3.4.6." Section 3.4.6 describes methods used in conducting analog subsurface investigations, and states that 3-ft search lanes were used. Please clarify if field procedures slightly different from the work plan was used. Group 1 work plan, Section 2.3.7, stated that the technology-aided surface and near-surface removal procedures would be similar to the process for surface debris removal process; and in Section 2.3.1.5, stated the personnel would be spread 5 feet apart while moving across the area to remove surface debris.</p> <p><b>Response:</b></p> <p>Field procedures for the analog instrument-aided surface and near surface investigation of the habitat reserve area were modified slightly to be consistent with the search lane width identified in Section 2.3.6 "Analog Magnetometer Searches" and the Quality Assurance Project Plan (QAPP) of the Group 1 Remedial Investigation/ Feasibility (RI/FS) Work Plan.</p> |
| 8   | Specific, p. 3-20. Section 3.7   | <p><b>Comment:</b></p> <p>The Group 1 RI/FS Work Plan indicated that munitions debris (MD) and</p>   |

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|     | MD Recycling  | <p>metal scrap would be inspected by SUXOS and UXOQCS to verify that it is free from explosives (FFE), and that material leaving the site will be certified as FFE using Form 1348. The text in this section indicates that disposal and/or recycling of MD recovered during the Parker Flats MRA Phase II remedial investigation has not occurred. Please ensure that the FFE certification is documented and included in a future report after these materials are shipped for disposal and/or recycling.</p> <p><b>Response:</b></p> <p>The following sentence has been added to the end of Section 3.7 MD Recycling to describe the FFE verification and documentation process:</p> <p style="text-align: center;"><i>“The lockable containers will also be certified as FFE by a SUXOS and a UXOQCS using Form 1348, which will accompany the locked containers when leaving the site for recycling. MD recycling efforts, to include FFE documentation, will be included in a future report.”</i></p> <p>In addition, please see the response to EPA Specific Comment No. 7.</p> |
| 9   | Specific, p. 3-20. Section 3.8.1 Environmental Protection Plan                  | <p><b>Comment:</b></p> <p>The Group 1 work plan, Section 12.3, stated that a habitat checklist would be prepared to support the fieldwork. Please state if one was completed.</p> <p><b>Response:</b></p> <p>The last paragraph of Section 3.8.1 has been revised as follows:</p> <p style="text-align: center;"><i>“The biological monitoring activities, to include <b>Natural Resource Impact Mitigation (NRIM) checklists</b>, were conducted in the Parker Flats MRA Phase II <b>and</b> documented in annual natural resources monitoring, mitigation, and management reports (ESCA RP Team 2009, 2010, 2011, and 2012).”</i></p>  |
| 10  | Specific, p. 4-7. Section 4.4 Seeding Program, Third full paragraph on the page | <p><b>Comment:</b></p> <p>The fifth sentence indicates that, for analog investigations, blind quality control (QC) seeds were placed on the ground surface. The statement suggests that there were no subsurface blind QC seeds in “areas in proposed residential and non-residential development areas where DGM surveys could not be completed.” However, Table 4-1 Parker Flats MRA Phase II Blind Quality Control Seeds report those seeds were located in the</p>   |

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|     |   | <p>subsurface. Please review the information and update the report as appropriate.</p> <p><b>Response:</b></p> <p>The fifth sentence has been revised as follows:</p> <p style="padding-left: 40px;">“For analog <i>instrument-aided surface and near-surface</i> investigations (<i>habitat reserve area</i>), the blind QC seeds were placed on the ground surface. <i>For analog to depth investigations (proposed residential and non-residential development areas), the blind QC seeds were placed at depths ranging from 2 to 18 inches bgs.</i>”</p>   |
| 11  | Specific, p. 5-4. Section 5.2.1 DGM Survey Investigation Results, first and second paragraphs | <p><b>Comment:</b></p> <p>The number of digital geophysical mapping (DGM) targets is reported as 5,646 and 7,722, respectively. Please review the information and update the report as appropriate.</p> <p><b>Response:</b></p> <p>The first paragraph has been revised to indicate “...7,722 target locations...” which is the accurate total.</p>  |
| 12  | Specific, p. 6-1. Section 6.0 Conclusions   | <p><b>Comment:</b></p> <p>Third paragraph includes a statement “The QC and QA approach resulted in a quality level that was greater than or equivalent to that achieved by the Army during previous MEC response actions.” Please delete this statement as it is not supported by the information provided elsewhere in the document. The document reports on remedial investigation field activities conducted by the ESCA RP Team in a portion of the Parker Flats MRA Phase II where only limited investigation was previously conducted by the Army. The previous Army investigations and the work described in this document are different in nature and are not directly comparable in terms of their scope and quality objectives.</p> <p><b>Response:</b></p> <p>The cited sentence in the third paragraph has been deleted.</p> |
| 13  | Specific, Table 2-1 Parker Flats  | <p><b>Comment:</b></p> <p>The information is referenced to the Army’s MMRP Database. All of the</p>  |

**Response to Comments**  
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**dated September 21, 2012**  
**Review comments provided by Gail Youngblood of the Army, dated October 15, 2012**

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|-----|---|--|
|     | MRA<br>Historical<br>MEC Items<br>Recovered   | <p>listed items have numbers entered in the Hazard Classifications” column. However, several of the listed munitions types do not have risk codes assigned to them in the database. Please provide the actual source of the risk code entries for these items.</p> <p><b>Response:</b></p> <p>The hazard classifications provided in Table 2-1 have been revised to be consistent with the Army MMRP Database source data.</p>   |
| 14  | Specific,<br>Figure 3-7<br>Parker Flats<br>MRA Phase II<br>Soil Scrap Lay<br>down Areas | <p><b>Comment:</b></p> <ul style="list-style-type: none"> <li>• Two “soil lay down areas” are shown in orange bordered boxes. But a solid brown box is used in the legend, and two brown polygons appear in the figure. Please check information and update the figure as appropriate for clarity.</li> <li>• Four “current soil pile” locations are noted within the larger/northern soil lay down area. Please provide explanation as to how they relate to the remedial investigation.</li> </ul> <p><b>Response:</b></p> <p>The orange bordered boxes around the “Soil Lay Down Area” were used to frame the area where soil from soil scraping and screening operations (related to the removal of metallic debris) were placed. The orange bordered boxes have been removed from Figure 3-7 for clarification and the legend symbol for “Soil Lay Down Piles” have been used. The brown polygons are also soil lay down areas from soil scraping and screening operations (related to the removal of metallic debris). The legend for Figure 3-7 has been revised for clarification.</p> <p>The four current soil pile locations are soil lay down piles from soil scraping and screening operations (related to the removal of metallic debris). Figure 3-7 has been revised for clarification.</p> |

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