

Appendix D
Responses to Comments



D.1 ENVIRONMENTAL PROTECTION AGENCY (EPA), DECEMBER 19, 2005

Comment 1: Section 2.1.4.5 MRS-59/MRS-59A, page 6: The last sentence in the first paragraph of the section states that, “MRS-59A contains a small portion of the of the identified 2.36-inch rocket range area.” While MRS-59A does contain a portion of the area that was suspected as potentially containing a 2.36-inch rocket range, subsequent investigation has produced no evidence that a range existed in the area. This is reflected in the Final Track 1 Ordnance and Explosives Remedial Investigation/Feasibility Study dated June 21, 2004. It would, therefore, seem prudent to refer to the 2.36-inch rocket range in question as a previously suspected range instead of using the word “identified” to describe its status. Please change the word “identified” to “previously suspected” in the noted section.

Response 1: Paragraph has been revised to state the following “MRS-59A is a Track 1, Category 3 site. It was originally a part of MRS-59. MRS-59 was identified by interviews conducted during the preliminary assessment/site investigation (PA/SI) phase of the 1997 ASR. The site reportedly included a 2.36-in. rocket range (type not stated) in the early 1940s, although no evidence of a range was found in the area during subsequent investigations. In 1996, MRS-59 was subdivided into MRS-59 and MRS-59A for property transfer purposes. The Army retained MRS-59A and transferred MRS-59 to BLM. MRS-59A contains a small portion of the previously suspected 2.36-in. rocket range area.”

Comment 2. Section 2.2.4.6 2005 Site Walk, page 11: The third, fourth, and fifth paragraphs of this section found on page 11 list a number of potential rifle launched high explosives and smoke grenade models which might have been the source of the tail fin assembly discovered during the subject site walk. The M23 series of rifle smoke grenades is not included in the listing or in the narrative description in Section 3.2.5 Potential Exposure Pathway Analysis. It is also not included in Section 4.2.3.2 Results or Section 5.2 EGA4 NE. This seems unusual, as the tail fin assembly of the M23 is almost identical to that of the M20 and M22 series rifle smoke grenades (fuze and associated attaching screws excepted). If there is some reason for this omission, please provide this information to the EPA. If not, please include the M23 series rifle smoke grenade in the appropriate portions of the Draft EGA2 & 4NE Track 1 PIAM.

Response 2: The M23 smoke rifle grenade has been added as a potential source of the tail fin assembly found in EGA4 NE. The document has been updated throughout to reflect this.

Comment 3: Section 3.1.5.3 Smoke Pyrotechnic Mixture (40mm M680 series smoke canopy projectile), page 16: The section reads, “Smoke pyrotechnic mixture (MEC) was found next to a 40mm cartridge case (MD) in the southwest portion of EGA2 during the 2005 site walk. It is likely that the cartridge case contained the smoke pyrotechnic mixture. The smoke pyrotechnic mixture therefore could have originated from a 40mm M680 series smoke canopy projectile.”

The description of the item found is somewhat confusing as to exactly what is present. A complete round of the M680 consists of a projectile that contains the pyrotechnic smoke mixture in an aluminum canister and a cartridge case that contains the propellant required to launch the projectile. The cited section states that the pyrotechnic mixture was found next to a cartridge case. This is unlikely, as the projectile normally lands a significant distance from the cartridge case, which is normally ejected from the launcher at the firing point by the individual that fired the cartridge. Also, the cartridge case does not at any time contain the pyrotechnic smoke mixture. That is contained in the aluminum canister that is ejected from the projectile approximately 2 seconds after it is launched.

Please review the cited section and correct the description of the MEC and MD as necessary to accurately reflect the components of the Cartridge, 40mm, Canopy White Smoke, M680 that were found in the noted location.

Response 3: Parsons UXOQC further researched this finding in EGA2 and determined that the item was actually an M74 series airburst simulator. The approval memo has been updated throughout to reflect this correction.

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Comment 4: Section 3.1.5.3 Smoke Pyrotechnic Mixture (40mm M680 series smoke canopy projectile), page 16: Subsection C states that, “The 40mm M680 series smoke canopy projectile contains no explosives.” This is technically incorrect, as the projectile contains a black powder ejection charge. Black powder is normally classed as low explosives. The statement cited would be correct if the word “high” were inserted between the words “no” and “explosives.” Please make this correction or delete the cited sentence in its entirety.

Response 4: Parsons UXOQC further researched this finding in EGA2 and determined that the item was actually an M74 series airburst simulator projectile. The text regarding the 40mm M680 series smoke canopy projectile has been deleted.

Comment 5. Section 4.2.1.1 Type of Training and Military Munitions Expected, page 24: The subsection labeled A. Military Munitions Burial Site (MRS-33, OE Cache) contains a statement that, “A single burial site containing military munitions was identified in the northeast portion of EGA4 near Reservation Road.” As EGA4 is no longer adjacent to Reservation Road and MRS-33 is currently found in EGA4 NE, please correct this narrative as noted.

Response 5: “EGA4” has been changed to “EGA4 NE”.

Comment 6. Section 4.2.1.1 Type of Training and Military Munitions Expected, page 24: The subsections labeled B. Mechanic Training Area, C. Engineer Training Area “B”, and D. Demolition Area all discuss MRS-23 and munitions items found therein. However, none of these narratives specifically state that these three locations, as well as MRS-23, are not located in EGA4 NE. Please revise the cited subsections to ensure that it is specifically stated that the three cited areas and MRS-23 are not found within the boundaries of EGA4 NE.

Response 6: Sections 4.2.1.1 B through D have all been revised stating their location relative to EGA4 NE. For the mechanic training area, the text states that Interviews indicate there was a concrete pit just outside EGA4 NE to the south, near Crescent Bluff Road. For Engineer Training Area B it states that an engineer training area “B” is marked on a 1957 training areas and facilities map outside EGA4 NE to the south, just northwest of the mechanic training area. For the demolition area it states that a demolition area approximately 400 ft to the west of EGA4 NE and MRS-23 is indicated on 1945 and 1946 training areas and facilities maps.

Comment 7: Section 4.2.1.1 Type of Training and Military Munitions Expected, page 24: The second paragraph of the subsection labeled B. Mechanic Training Area states, “This area was identified as IA Site 41 during the site characterization phase of the basewide RI/FS due to limited surface soil contamination.” The following paragraph notes that, “In 1997, a four-foot removal was conducted on the area (designated MRS-23).” Inspection of Maps 1-7 of Appendix A reveals that the areas of IA Site 41 and MRS-23 are incongruent, with MRS-23 located outside of EGA4 NE and portions of IA Site 41 overlapping EGA4 NE. However, as the cited paragraphs are currently written, it would appear that the two sites (IA Site 41 and MRS-23) are one and the same. Please revise/expand the listed paragraphs to include information that the two sites (IA Site 41 and MRS-23) overlap but are not congruent.

Response 7: Text has been added that the northern portion of MRS-23 is coincident with Site 41.

Comment 8. Appendix B Evaluation of Previous Work: EGA4 NE Evaluation Checklist Part 2: Munitions Response Review (MRS-33), page B-17: Checklist question 2 asks, “Is there evidence that training involved use of High Explosive (HE) or Low Explosive (LE) items?” In response, the last sentence under Sources Reviewed and Comments states that, “Items removed from MRS-33 did not include HE or LE items.” While this is a correct statement as to the item types, a comparison of this comment with that found on page B-6 in response to the same question concerning EGA2 reads, “The fuze primer of the M1 AT practice mine contains small amounts of low and/or high explosives.” As consistency is a prime concern with respect to determinations of this type, it should be noted that the primers for the 40mm cartridges found in the burial pit (MRS-33) also contain small amounts of low

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and/or high explosives. Both cited comments should, in general, reflect the same type information. However, it is appropriate for question 2 to be answered “No” on page B-17 as the buried items were determined to have no relation to, and were not used in, training conducted in EGA4 NE. (The question was correctly answered “Yes” on page B-6, as the items under discussion there were used in training conducted in EGA2.) Please review the two cited portions of Appendix B and correct them as deemed necessary to achieve consistency. In addition, please correct the title of page B-6 to read “Appendix B” instead of “Appendix A” as it currently reads.

Response 8: Response to question 2 has been revised to state that items removed from MRS-33 did include 40mm cartridges, which have primers that contain a small amount of low and/or high explosives. The title of page B-6 has been corrected to “Appendix B”.