

Appendix H

Responses to Comments

APPENDIX H

RESPONSES TO COMMENTS

DRAFT RANGES 43–48 SITE-SPECIFIC WORK PLAN

H.1 REGULATORY AGENCY COMMENTS

H.1.1 ENVIRONMENTAL PROTECTION AGENCY, AUGUST 28, 2002.

Comment 1: Please review the IA document descriptions (e.g., Prescribed Burn Air Sampling and Analysis Plan) to ensure they are consistent with current approaches.

Response 1: comment accepted. The description of the Prescribed Burn Air Sampling and Analysis Plan has been updated to be consistent with current approach.

Comment 2: Figure 1-3 (a map/aerial photograph) has a series of notes in the bottom right corner of the page which describe the surface area of the listed sections of the site in acres. These listed sections are coded on the map using different colored borders and fills to identify each of the areas. Some of the listed sections, or portions thereof, have the acreage indicated in print on the map, while some do not. The numbers on the map differ from those in the notes, which is somewhat confusing. Please revise the map to eliminate the noted confusion and to ensure that the reader may easily identify the total area of each listed section and its subsections.

Response 2: comment accepted. Figure 1-3 and its text have been revised to make the acreages of the Ranges 43–48 IA site and its habitat and development areas more easily readable.

Comment 3: Section 2.3.5 (Visual Surface Removal) states that "This surface removal will not use geophysical equipment to locate UXO, UXO-like, OE-scrap, and non-OE-scrap items; instead, personnel will visually locate these items in accordance with section 2.3.6.2 of the PWP [Ref.9], which defines visual surface removal procedures." Since this removal is being done "to make the site safe for brushcutting operations," the possibility exists that some of the area to be visually searched may be covered with low vegetation and related debris. In addition, some of the areas where this work is to be done have been noted to contain UXO. This being the case, it would appear that the safety precaution/recommendation found in U.S. Army Engineering and Support Center, Huntsville, Safety Alert 99-02 would be applicable, unless it has been determined that no sensitive fuzes are expected to be present on the site where the removal will be conducted. The Safety Alert states that "The following precautions are provided for your use on project sites containing munitions with sensitive fuzing. Therefore, use magnetometers to the maximum extent possible when the ground surface cannot be seen."

Response 3: comment accepted. Section 2.3.5 has been revised to include the use of Schonstedt GA-52/Cx magnetometers in areas where the SUXOS and/or the OEFOM determine that the surface is obscured by brush.

Comment 4: Chapter 4 (Explosives Siting Plan) that "The locations of blow-in-place detonations will be recorded with a GPS; the locations of consolidated detonations will not." Since these sites may be of interest if UXO/OE or chemical contamination is discovered there at a later date, it would appear that the location and the items destroyed there would be of value to those conducting the investigation. Please explain why the location of consolidated detonations should not be recorded.

Response 4: comment accepted. Chapter 4 has been revised to state that consolidated shot locations will be recorded with a GPS, entered into the project database, and included in the AAR.

H.1.2 CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY (CAL EPA), DEPARTMENT OF TOXIC SUBSTANCES AND CONTROL (DTSC), AUGUST 26, 2002.

Comment 1: The Removal Depth Analysis in Appendix D (Chapter D.4) indicates that there has been discussion between the Army and the Bureau of Land Management (BLM) regarding the proposed remediation depth in the habitat reserve area. It is important that BLM be provided continuing opportunity to participate in the discussions on OE remediation depths for the property to be transferred to their control. Although the work performed as part of this interim OE remedial action will be reevaluated as part of the basewide OE RI/FS, a statement regarding BLM's level of acceptance of the proposed remediation depth should be added the draft final version of the work plan.

Response 1: comment accepted. A statement has been added to a new section 1.5 that discusses how the subsurface OE removal needs to be performed to depth in order to maximize public safety. The Army is coordinating the development of the interim action cleanup approach at Ranges 43–48 with BLM. The Draft SSWP was provided to BLM, and responses to the BLM comments are included this section. As indicated by BLM in its comment letter, there is a possibility that Monterey County and Monterey Peninsula College may receive parts of the Ranges 43–48 site in the future, and the Army is coordinating the cleanup of this site with these potential reuse entities as well to ensure that the interim cleanup approach is consistent with the long-term remedy and the reuse concepts of these agencies.

This SSWP describes the procedures, methods and resources that Parsons and its subcontractors will use while performing the surface and subsurface OE removal and OE detonation with engineering controls as part of the interim remedial action at Ranges 43–48. The cleanup approach described herein is designed to meet the objectives of the Interim Action, and the future reuse concepts for this area have been considered extensively in the development of the cleanup approach. Since this work is conducted as an interim action and will be re-evaluated under the OE RI/FS, the Army will continue to coordinate the cleanup and evaluation of Range 43–48 area with the anticipated property recipients and the regulatory agencies.

Comment 2: The work plan and Removal Depth Analysis uses language that is inconsistent with previous definitions provided to DTSC and the definition in Section 2.3.11 of the Preliminary Draft version of the work plan. A 2-foot (to depth) or 4-foot (to depth) removal is defined as "chasing anomalies to the designated 2- or 4-ft depths, and if they are still not found while geophysical instrument signals are strong, an approval from the USACE is obtained before digging any deeper". It has been DTSC's past understanding that "chasing an item to depth" means excavation to locate an anomaly is continued past the specified removal depth whenever geophysical instrument signals are strong, with a virtually automatic verbal approval by the on-site SUXOS, so that no unresolved anomalies are left in place. This understanding was also agreed to at the SMART meeting on August 7, 2002 that all anomalies will be investigated to depth or until the signal from the geophysical instrument is resolved. The definition of "chasing an item to depth" should be standardized (with the agreement of all parties to the FFA) to avoid

future confusion. The agreed upon definition should be incorporated into the next revision of the Programmatic Work Plan.

Response 2: The inclusion of the definition of "chasing an item to depth" in the next revision of the PWP will be discussed by the BCT.

Comment 3: The current method for this remedial action is to perform the subsurface OE removal to depth; therefore, all anomalies will be dug until they are found and no anomaly will be left unresolved. However, in the event that performing this subsurface OE removal to depth adversely impacts the habitat or the operation's schedule (the operation needs to be completed before the maritime chaparral regrows and makes the surface inaccessible for geophysical surveys) and, as a result, requires the regulatory agencies to approve a proposed change to the operation's procedures, that approval will be expedited. This information has been included in a new section 1.5 (Removal Process Selected for Site).

Response 3: The current method for this remedial action is to perform the subsurface OE removal to depth; therefore, all detectable anomalies will be dug/resolved until they are found and no anomaly will be left unresolved. Because the subsurface OE removal is now being performed to depth, discussion of the 2-ft and 4-ft removals is moot.

Comment 4: The work plan methodology does not appear to consider using dual technologies (i.e. the use of two complementary instruments to survey the same area) for the geophysical survey. Based upon the results of the ODDS, the use of dual technologies for investigation purposes is advisable. Additionally, previous geophysical surveys of the Del Rey Oaks group indicated that multiple sweeps can yield additional UXO discoveries. Please discuss how dual technologies can be used effectively at Ranges 43–48.

Response 4: It is expected that the major goals of this remedial action—protecting the public from the imminent threat posed by the presence of OE and performing the work to be consistent with the long-term remedy for the site—will be achieved by implementing the PWP process. The PWP is a primary document under the Fort Ord Federal Facilities Agreement (FFA) that has been approved by the regulatory agencies. This SSWP implements the PWP process of using the most appropriate technology with rigorous QC procedures. It should be noted that Parsons did present dual-instrument technology as one of the possible methods to perform the remedial action in the Ranges 43–48 IA site, but it was determined that the single BAT instrument process would be used.

Comment 5: The location where each individual UXO/OE item blown in place, and/or consolidated shot are detonated should be recorded using GPS and entered into the project database. A record of what types of items required detonation in place should also be included.

Response 5: comment accepted. The locations of blow-in-place and consolidated detonations will be recorded with a GPS, entered into the project database, and included in the AAR.

Comment 6: The work plan should be revised to include pre- and post-detonation soil sampling. Given the large number of items detonated in the recent BIP and consolidation shots at Riso Ridge, and the large number of items expected to be encountered in Ranges 43–48, it would be prudent to conduct pre- and post-detonation soil sampling to document the presence or absence of soil impacts. This information could also be used to support the basewide OE RI/FS effort.

Response 6: The same objective can be achieved by (1) recording the locations of detonations at Ranges 43–48, and (2) investigating the potential soil impacts from detonation utilizing the process developed in the Detonation SAP. If significant soil impacts are found, further investigation will be aided by the detonation location information.

As documented in OE IA ROD Section 2.14.3 (Selected Remedies, page 36), “emissions and potential chemical contamination from detonated OE are expected to be insignificant and not of concern in terms of human health based on information evaluated for the Detonation SAP and Basewide RI/FS. The effectiveness of detonation methods will be evaluated based on the analysis of the data gathered during the remedial action at Ranges 43–48 and/or ongoing actions performed as part of the basewide OE RI/FS.” Potential soil impacts from ordnance detonation will be investigated utilizing the process developed in the Detonation SAP as part of the basewide OE RI/FS. Soil sampling activity at Ranges 43–48 will be conducted in coordination with the OE BCT.

Since the Detonation SAP was finalized in 2000, the areas where most OE actions are taken have shifted from training areas outside the MRA into inside the MRA. Cleanup actions inside the MRA generate types of OE items that are quite different from the types of OE items that the Detonation SAP was developed to address. Substantially fewer would be transportable. Additionally, new information from soil sampling activities, from other ordnance sites, to investigate the potential soil impacts from ordnance detonations has become available in recent years, and it would be prudent to evaluate such new information prior to conducting actual field sampling. The soil investigation-portion of the Detonation SAP will be refined to incorporate the recent information. Investigation based on the Detonation SAP will be conducted as part of the basewide OE RI/FS.

Regarding the issue of waste characterization, the Army agreed to amend the Programmatic Work Plan to specify procedures by which each item discovered will be subject to waste characterization using California’s regulations, and those items determined to be hazardous waste pursuant to the definition of hazardous waste will be managed in accord with such regulations (OE IA ROD Section 1.4). The Army is in the process of drafting such a procedure, for regulatory agency review, to determine which items discovered during an OE response action at the former Fort Ord would be handled as a hazardous waste, and what California requirements apply. The Army has not proposed soil sampling as part of the waste characterization procedure, nor does it view the soil at any OE site to be considered as a “discovered item.” The Army intends to provide a waste characterization procedure for regulatory agency review shortly.

Comment 7: Please provide (as a separate deliverable, if preferred) information regarding the number and type of QA seeded items to be planted within the Ranges 43–48 area prior to the geophysical survey.

Response 7: At least one item will be seeded for every 4 acres within a site; the limit of 20 seeded items per site listed in the QC Seeding SOP in the PWP has been removed. FVF 017 in (included in Appendix F) addresses this change. This information has been included in Chapter 11.

Comment 8: Change "confirm or refine" to "evaluation" in the description of the Prescribed Burn Air Sampling and Analysis Plan. The current language implies that the outcome is predetermined.

Response 8: The text included was based on the last sentence of section 3.1 of the Prescribed Burn Air Sampling and Analysis Plan.

Comment 9: Section 1.2 (Scope) indicates that any deviation from the SSWP or PWP requires prior approval of both Parsons and CESP. Both the SSWP and PWP are primary documents under the FFA and changes to the procedures described in the PWP are subject to review and approval of the full BCT, which includes the EPA and DTSC. Please revise the text to clarify the need for full BCT approval for any changes in the work plan.

Response 9: comment accepted. Section 1.2 has been revised to state that any deviation from either the PWP or SSWP requires an approved FVF. Draft FVFs will be prepared by Parsons and distributed to the USACE, DENR, EPA and DTSC for discussion. Following approval by the BCT, Parsons will prepare final FVFs and incorporate them into the SSWP.

Comment 10: The changed acreages on Figure 1-3 do not appear to match the description in section 1.4 (Site Description).

Response 10: comment accepted. The changed acreages actually do match those listed in section 1.4. The goal of this map was to show the revised IA site and reuse boundaries and highlight the areas where the reuse changed. However, OE-15SEA.4 and the portion of OE-15MOCO.2 not included in the Ranges 43–48 IA site should not have been shaded and the inclusion of the 7 and 9 acres printed on the map may have also been confusing. Therefore, Figure 1-3 has been revised to only shade those areas included in the Ranges 43–48 IA site, 473 acres is now printed on the center of the green habitat area of the map and 25 acres is now printed on the center of the blue development area on the map.

Comment 11: The description of the preparatory action to remove tires etc. needs to be changed to note that only accessible areas of the site will be included in the preparatory action since the prescribed burn will not yet have taken place.

Response 11: comment accepted. The wording in the preparatory action description has been revised to state that the preparatory action will be performed in the site's accessible areas. Discussion of the preparatory action throughout the document reflects the fact that it will be performed in this manner.

Comment 12: The sentence on lines 24–26 in Section 2.3.8.3 (Identifying Special-Case Areas) lines should be clarified by replacing "document" with "work plan", and including the protocol for regulatory agency involvement in review of the separate special-case area work plans.

Response 12: Documentation will be submitted by Parsons for special-case areas; however, the exact format (e.g., work plan or technical memorandum) used to deliver this documentation is still being determined. Parsons will submit the procedures to be used for special-case areas, and they will be reviewed for approval by USACE, DENR, and the regulatory agencies. This information is provided in sections 2.3.8.3 and 5.16.5.

Comment 13: Section 2.3.7 (Preparatory Inspection/Most appropriate technology Walk-through) should describe how the regulatory agencies will be notified (prior to the initiation of the field portion of the geophysical investigation) of the instrument selection for each area should also be included.

Response 13: comment accepted. Section 2.3.7 has been revised to state that after the geophysical (BAT) walk-through, a map will be delivered to the USACE within 14 days that shows the instrument selection for each area within the site and that this map will then be forwarded to the regulatory agencies.

Comment 14: Grids surveyed with an analog instrument should be subject to the same QC step-down survey as the digital instruments. The PWP does not exempt analog instruments from the QC step-down procedure.

Response 14: comment accepted. A step-down QC survey will be performed with the instrument initially used to survey the site on all surveyed grids, whether the grids were initially surveyed with a digital or analog instrument.

Comment 15: The QA Evaluation described in Section 11.15.8 of the PWP should be conducted. The phrase "may be conducted, at the discretion of the USACE" should be removed from the end of the last sentence. A Quality Assurance Technical Analysis Technical Memorandum (similar to the memorandum provided for the previous Del Rey Oaks geophysical investigation sampling and removal) should be prepared.

Response 15: comment accepted. The QA process listed throughout the SSWP has been changed consistently to state that the other QA activities listed in PWP Section 11.15.8 of the PWP will be conducted. A description of the digital QA procedures that are currently being performed is now included as Appendix G in the back of this SSWP.

Comment 16: The box in the Figure 2-3 (flow chart) describing "Analog 10% QC Survey" should be deleted and the reference to BAIT should be deleted in favor of the preferred term BAT.

Response 16: comment accepted. The figure 2-3 has been revised to show that an analog step-down QC survey will be performed on grids initially surveyed with an analog instrument. All references to BAIT have been changed to BAT throughout the document.

Comment 17: The Removal Depth Analysis in Appendix D includes a limitation on the amount of work that can be done before the regrowth of site vegetation. A discussion of how many work teams can safely operate on site at the same time and why should be included both in this section and in Appendix D to support the Removal Depth Analysis. Discuss what options are available (such as limiting the burn size or phased approach) if an adequate number of teams can not safely operate at the same time on site to meet the cleanup objectives.

Response 17: Preliminary evaluations have been undertaken on the optimum loading of field crews at Ranges 43–48 IA site, and a mobilization schedule is planned to be completed before the prescribed burn. The OEFOM is responsible for all team coordination. The sequence of events will allow maximum team participation and maintain safe separation distance. These activities will be coordinated with the Parsons UXOSO and USACE OESS. Invariably there will come a time as we near completion of this operation that space will become limited. At that time teams will either be reassigned to other sites or demobilized.

Comment 18: The category and group terminology from the ODDS should be included in the table.

Response 18: As a result of the Section 2 Static Test included in the ODDS Final Report (Volume 1), it was determined that the category/group terminology was not appropriate because of the way they had been defined (i.e., depth plus lift).

Comment 19: Were any of the latrines at Ranges 43–48 included in previous investigations? If not, the work plan must discuss how the latrines will be investigated.

Response 19: comment accepted. Not all of the latrines have been investigated; therefore, Section A.4.2 of Appendix A, Preparatory Action, has been revised to state that the pits of the field latrines that are moved onto asphalt range pads will be investigated IAW the field latrine SOP in Appendix G of the PWP.

Comment 20: The line spacing used for the G-858 should be specified.

Response 20: comment accepted. The work plan now states that the G-858 will be used with 2-ft line spacing.

Comment 21: The work plan indicates that once the coordinates of an anomaly have been found, a sweep will be conducted within a 2-ft radius. Chapter 5.13 of the PWP specifies a sweep with a 3-foot radius. The SSWP should be revised to be consistent with the 3-ft radius specified in the PWP. Also, it should be noted that in accordance with Chapter 2.3.8.3 of the PWP, the intrusive investigation teams will search a 5-ft radius if the anomaly is not found at the location indicated on the dig sheets.

Response 21: The RTK GPS is consistently being used and it is accurate to a minimum of inches, reducing positional errors greater than 2 ft (e.g., instrument bounce and data anomaly selection). Therefore, a 2-ft search radius has been determined to be appropriate for finding any anomaly sources. If nothing is still found, the QC geophysicist will see this data when reviewing the results and may investigate the location to confirm whether there is an anomaly present.

Comment 22: The change described in the data point spacing is acceptable provided that the allowable 2% data gap is not one continuous area, and no single data gap shall exceed one-half the size of the anomaly representing the smallest target.

Response 22: Chapter 11 has been revised to state that the sum of the lengths of all transect segments that are further than 0.35 ft. from an adjacent data point along the transect will not exceed 2% of the sum of the transect lengths in a given gridblock.

Comment 23: How "new terrain" will be defined needs to be documented.

Response 23: comment accepted. Terrain will be considered "new" if the slope, surface roughness, or vegetation is significantly different from what has been encountered in the past. This information has been added to Chapter 11.

Comment 24: The change described in instrument standardization should include a description of the procedures to be followed in the event that the geophysical equipment fails the test at the end of the day or the completion of the gridblock.

Response 24: comment accepted. If the equipment fails the standardization test (the end test response is not within 20% of the start test response), it will be discussed with CESPK and a resolution will be determined. This information has been added to Chapter 11.

Comment 25: An explanation of how tires will be "moved remotely" should be included.

Response 25: comment accepted. Removing tires remotely entails attaching a 300-ft cable to the tires, hooking the cable to a backhoe, and then driving the backhoe to haul the tires away. This information has been added to Appendix A.

H.2 COMMENTS FROM OTHER ORGANIZATIONS AND THE PUBLIC

H.2.1 MONTEREY BAY TOXICS PROJECT, SEPTEMBER 2, 2002

The Army received comments from the Monterey Bay Toxics Project via a letter dated 2 September 2002. This letter was identical to the letter received 12 May 2002 for comments on the Proposed Plan, except for citizenship issues that will be addressed by the Voluntary Relocation Plan

This 2 September 2002 letter included two attachments:

- (1) A letter from the Monterey Bay Toxics Project that was originally submitted 13 June 2002 in response to OE detonations in the Proposed Plan. The issues described in this letter are addressed by the ROD, which is available in the Fort Ord Administrative Record.
- (2) Comments from Bill Mitchell and Associates submitted 15 August 2002. These comments include the following:
 - (a) A summary of comments previously submitted in response to other Fort Ord documents including the three other separately prepared Ranges 43–48 IA RD/RAWP documents (Voluntary Relocation Plan, Prescribed Burn Plan, and Prescribed Burn Air Sampling and Analysis Plan), the IA OE RI/FS, ODDS, and the Ordnance Detonation SAP. Many of these issues were already raised in a letter dated 26 March 2002 that was submitted through the Monterey Bay Toxics Project letter in response to the proposed plan, dated 12 May 2002. These comments are addressed by the ROD, which is available in the Fort Ord Administrative Record.
 - (b) Seven specific comments and questions concerning the SSWP, which are addressed below:

Comment 1: Will the PB sufficiently remove the vegetation on Ranges 43–48 to Permit UXO detection and removal in 15-months?

According to the SSWP and the PBP, the PB will be considered successful if the following results are achieved: First the fire is contained within Ranges 43–48. Second, 90% of the vegetation in areas known to contain high densities of UXO (Critical Areas) are reduced to a height less than 5 ft. and there are no unburned areas larger than one acre. Third, 50% of the vegetation in areas known to contain moderate densities of UXO (Required Areas) is reduced to a height of less than 5 ft. and there will be no unburned areas larger than two acres. Now, assume that 25% of the vegetation lies in Critical Areas and 60% lies in required Areas. Under these conditions, if the vegetation on 160 acres is still higher than 3 ft, the PB would still be considered to have been a success. Considering this and the significant performance degradation of the UXO detection equipment caused by rough terrain and vegetation cover, I do not see how the PB can be an effective means to remove the vegetation from the range to the degree required to conduct the proposed remediation effort in the manner outlined.

Response 1: Yes. The Army believes the burn will be performed effectively, clearing the majority of the vegetation and allowing access for the OE detection equipment so that the interim action can be completed within the 15-month timeframe.

Comment 2: Can the Army actually confine the prescribed burn to Ranges 43–48?

The SSWP implies that based on its experience with earlier PB's conducted on former Fort Ord ranges, the Army will be able to control the acreage burned during the PB. But little actual data from previous burns at former Fort Ord has been presented in the SSWP or its supporting documents. However, the SSWP notes that (to avoid shrapnel-related injuries caused by detonating ordnance) the required standoff distance during the PB will be 1,071 ft. In contrast, the PBP notes that helicopters equipped with fire-suppressing foam will be used to quench any fires that escape from Ranges 43–48. So, if the fire spreads to an area outside Ranges 43–48, which may contain UXO, will the Army allow a helicopter to fly close enough to the wildfire to effectively dispense fire-suppressing foam; that is, will the Army waive the 1,701 ft requirement? This issue is not even mentioned in the SSWP or the PBP.

Response 2: This comment applies to the Prescribed Burn Plan.

Comment 3: Why were the EM61 and G-858 selected for the post-prescribed burn UXO detection effort when based on the ODDS, the EM61 handheld would be the better unit to use?

According to the ODDS Study, the EM-61 and G858 have similar detection and discrimination capabilities and perform best for UXO lying from 2-4 ft bgs. The ODDS Study also concluded that the EM-61 HH was superior to these two units for detecting UXO lying just below the surface to 2 ft bgs. If the preliminary goal of the IA is to detect and remove all UXO down to a depth of 2 ft bgs, why was the EM-61 selected instead of the EM-61 HH? Also, wouldn't it be more appropriate to use the EM-61 and the EM-61 HH?

Response 3: The EM61 and the G-858 were selected because (1) some of the OE items that were found during previous investigations in Ranges 43–48 were large items that had penetration depths greater than 24 in, and the results of the ODDS seeded test proved that the EM61 and the G-858 were the best tools at detecting larger items at greater depths.

Comment 4: Can the UXO be detected and removed to a depth of two-feet below ground surface within 15-months after the PB?

The activity schedule in the SSWP implies that it will be possible to identify and remove UXO down to the 2 ft bgs within 15 months after the PB. However, according to the MAGNETIC ANOMOLY report, it took 90 days to identify just six potential UXO items and four of them were on or near the surface. In addition, the ODDS report mentions that the detection rate achieved by the primary UXO detection system that will be used after the PB detected between 66 and 75% of the UXO, which had been selected on the test site. In light of these facts and the likelihood that 25-35% of the vegetation remaining after the PB could be taller than 5 ft (PBP), it doesn't seem possible to complete the UXO detection and removal effort within 15 months after the PB.

Response 4: Sufficient resources will be allocated to this project to ensure that work can be completed within the 15-month timeframe. The depth distribution of the seeded test is not indicative of the items expected to be encountered in the Ranges 43–48 IA site. The majority of

the vegetation will be cleared through the prescribed burn; in the event there is leftover unburned vegetation, alternative solutions will be pursued.

Comment 5: Is there any credible evidence to support the Army's claim that the prescribed burn plume will not be harmful?

The SSWP uses the information in the AS&AP and the Tech Memo as primary sources for concluding that the materials released into the plume by UXO incidentally detonated during the PB would not adversely affect human health or the environment. However, as I discussed in detail in my comments submitted to the Army by the MBTP in May 2002, the methodology and arguments used in the AS&AP to support this claim are not valid. The additional documents issued since March 2002 do not provide any additional credible information. Further, there is no discussion about testing the plume samples to determine their potential toxicity to humans or ecosystems. Also, as I pointed out in these earlier comments, I have been told that there are clusters of poison oak plants present on the ranges being considered for the PB. But there is no mention in any of the Army-prepared documents about this. The emissions from burning poison oak can be highly toxic to sensitive individuals. Is poison oak present on the ranges? What credible evidence does the Army have to support its claim that the plume will be harmless?

Response 5: The current text reflects the purpose of the Prescribed Burn Plan.

Comment 6: Can the Army really collect representative plume samples from the prescribed burn and post-burn UXO destruction plumes?

The SSWP and other documents imply that the Army will collect samples from the plume to ensure that the emissions are harmless before they allow people to return to their homes. Even if the Army could collect samples, which provide an adequate, even semi-accurate characterization of the toxicity of the materials released (doubtful), the results could not be available until weeks later under the best conditions. Also, the Army does not seem to have actual data on the toxicity of the plume or the ash, which will be deposited over a wide area. This is a critical deficiency in the SSWP, particularly with respect to the schools and playgrounds in the area and with respect to the risk involved in working in the burned-over areas. As far as I know, the sampling equipment needed to collect a representative sample from these plumes doesn't exist and no one has been able to collect defensible, meaningful and representative samples from either type of plumes using ground based samplers. Yet, the Army continually claims that it will be able to accomplish this. As I noted earlier, the SSWP cites the AS&AP and the Tech Memo to support the Army's position that it can collect and interpret quickly representative PB plume samples using a single 8 top 10 hr sample collection period for a PB, which will last for 36-48 hours (PBP, RI/FS). The AS&AP assumes that the wind direction will be constant across the 36-48 hr. burn and the character and pollutant levels in the PB plume will not change over the duration of the plume. It does not even mention the land – sea breeze phenomenon, which is a normal daily event on the Monterey Peninsula. However, actual data from the Monterey Airport, which can be found contained in the ATDSR Report, shows that during an 8-hour daylight period the wind direction can change more than 90 degrees.

When I reviewed an earlier version of the AS&AP in 2000 (while I was employed by the US EPA), I concluded that the technical approach and procedures described in the AS&AP would not produce meaningful or defensible sample of the PB plume. The June 2002 version of the document is little changed from the version I reviewed earlier. Some of the problems I identified

and transmitted to the Army in 2000 remain in the AS&AP. For example, the Army still proposes to use a high volume sampler equipped with an 8 X 10 in Teflon filter to collect particulate samplers for subsequent analysis for toxic metals by XRF (the backing on these filters prevents them from being analyzed by the XRF). Another example is the statement that the preferred absorbent for energetics in the air is not Tenax (the flash desorption treatment used to remove materials from Tenax will destroy some or all of the energetic materials). Also, the OSHA low volume sampler will not collect sufficient samples for analysis for energetics and the real time filterable particulate matter sampler will only be accurate if it is calibrated before the PB using particles with physical and chemical characteristics like the ones that will result for the PB. Further, the plan still does not contain a procedure to determine the amount of time that the samplers were actually collecting a sample from the plume nor is there any discussion about testing the plume samples to determine their potential toxicity to humans or ecosystems or the pollutant distribution with the plume.

Based on the above discussion, how can the Army claim that it will monitor and assess the harmfulness of these plumes in a way that will protect human health and the environment?

Response 6: The current text reflects the purpose of the Prescribed Burn Air Sampling and Analysis Plan.

Comment 7: The urgency to conduct a prescribed burn with BIP is still not supported by credible documentation!

The SSWP cites the RI/FS and other documents as the basis for conducting the PB/BIP clearance of Ranges 43–48. The RI/FS and the PBP note that the history of trespassing incidents (and the Army’s inability to stop them) is the primary reason why the IA (PB/BIP) is needed, but it is still not apparent from the information presented to date that the areas being considered for the IA represent the type of imminent hazard to public health or safety that would justify an IA, which involved a PB approach. For example, in the last three years there have been five trespass events on Ranges 43–48 (RI/FS).

Based on the information in the SSWP and these other documents, I still believe that: (1) simply increasing the surveillance of the site until a viable technology for detecting the surface UXO (such as the Oak Ridge National Laboratories’ helicopter-based UXO detection system currently completing field validation) are available would adequately address the risks associated with these ranges; and (2) the PB/BIP approach is the one that is least likely to be protective of human health and the environment in the short and long-term and that there is no need to conduct an expedited IA on Ranges 43–48.

Response 7: Alternatives for clearing vegetation and detonating OE were presented in the Army’s Proposed Plan. The responses to comments made regarding the Proposed Plan are provided in the ROD, which is available in the Fort Ord Administrative Record.

H.2.2 BLM HOLLISTER OFFICE, AUGUST 28, 2002

The BLM submitted a letter covering three topics: (1) future land use and management, (2) cleanup requirements, and (3) habitat impacts and restoration. For the purpose of addressing these comments, the following responses refer to the specific paragraphs where these topics appear.

Future Land Uses and Management (paragraphs 2–8)

The Army is aware that Monterey County and Monterey Peninsula College may receive parts of the Ranges 43–48 site in the future, and the Army is coordinating the cleanup of this site with these potential reuse entities as well as BLM to ensure that the interim cleanup approach is consistent with the long-term remedy and the reuse concepts of these agencies.

This SSWP describes the procedures, methods and resources that Parsons and its subcontractors will use while performing the surface and subsurface OE removal and OE detonation with engineering controls as part of the interim remedial action at Ranges 43–48. The cleanup approach described herein is designed to meet the objectives of the Interim Action, considering the future reuse concepts for this area. Specifically, the Draft Final SSWP calls for subsurface removal to depth, within the constraints of safety, habitat and resource considerations. Cleanup of areas of high anomaly density and large target items that are anticipated to involve significant soil disturbance beyond the scope allowed in the HMP will be set aside as special case areas. Procedures for addressing them will be developed after the burn when the scope of the potential disturbance and the habitat damage become clearer. The Army will coordinate with BLM, other potential reusers and USFWS, as well as EPA and DTSC during the development of such procedures. The Army expects that implementing the interim OE cleanup at Ranges 43–48 as described in the Draft Final SSWP is consistent with supporting BLM's current reuse concepts as described in your letter, including recreational, habitat management, and fire management activities. The AAR for this work will be made available to BLM so that the information from the interim action cleanup would be an input for BLM's refinement of its reuse concepts.

Since this work will be conducted as an interim action and will be re-evaluated under the OE RI/FS, the Army will continue to coordinate the cleanup and evaluation of Range 43–48 area with the anticipated property recipients and the regulatory agencies.

Cleanup Requirements (paragraphs 9–13)

The Draft Final SSWP calls for subsurface removal to depth, within the constraints of safety, habitat and resource considerations. Cleanup of areas of high anomaly density and large target items that are anticipated to involve significant soil disturbance beyond the scope allowed in the HMP will be set aside as special case areas. Procedures for addressing them will be developed after the burn when the scope of the potential disturbance and the habitat damage become clearer. The Army will coordinate with BLM, other potential reusers and US Fish and Wildlife Service, as well as EPA and DTSC during the development of such procedures.

The location, type and depth of each OE found will be recorded, except where soil sifting may be conducted. Field latrines will be investigated according to Parsons SOP. The information will be reported in the After Action Report.

Range target removal procedures will be performed in a manner that minimizes disturbances to the habitat.

Habitat Impacts and Restoration (paragraphs 14–18)

The Army looks forward to working with BLM on issues regarding impacts to the habitat and site restoration in the Ranges 43–48 IA site. These issues will be addressed in a separate correspondence in the near future.

The Ranges 43–48 Prescribed Burn Plan was developed separately to address the procedures for conducting the prescribed burn. Conducting the burn safely and controlling the burn within the site are two of the major objectives of the prescribed burn operations.

The extent of the tree removal/pruning operations are being determined by the Ord Military Community Fire Chief, who is deciding which trees to prune/remove on a case-by-case basis. The Army recognizes the need to minimize impacts to the habitat while performing actions to enhance the containment of the prescribed burn.

The only fire prevention measures that are currently being performed for the Watkins Gate Road fuel break are a vegetation clearance and a subsurface OE removal that are being completed under the Phase 3 defensible polygon fuel breaks technical memorandum. There are no immediate plans to disk this fuel break.

General Comments

paragraph 1: No response required.

paragraphs 18–19: The Army appreciates BLM's support of this important cleanup action. We look forward to continuing to work with you on the issues related to the environmental cleanup of the MRA.