



## TETRA TECH

PITT-03-11-016

March 10, 2011

Project Number 112G00958

Mr. Adolph Everett, P.E.  
Chief, RCRA Programs Branch  
U.S. Environmental Protection Agency - Region II  
290 Broadway - 22<sup>nd</sup> Floor  
New York, New York 10007-1866

Reference: Contract N62470-08-D-1001  
Contract Task Order (CTO) JM29  
U.S. Naval Activity Puerto Rico (NAPR)  
EPA I.D. No. PR2170032703

Subject: Final Sampling and Analysis Plan for On-Site Construction Support for Debris Removal  
SWMU 1 [Former Army Cremator Disposal Site] and comment response letter

Dear Mr. Everett:

Tetra Tech NUS, Inc., on behalf of the Navy, is pleased to provide you with one hard copy and one electronic copy provided on CD of the Final Sampling and Analysis Plan (SAP) for On-Site Construction Support for Debris Removal for Naval Activity Puerto Rico (NAPR) SWMU 1 [Former Army Cremator Disposal Site]. The associated comment response letter addressing comments on the draft version of the document is attached.

If you have questions regarding this submittal, please contact Mr. Stacin Martin, BRAC PMO SE Remedial Project Manager (RPM) at 757-322-4780.

Sincerely,

Linda Klink, P.E.  
Project Manager

LEK/clm  
Attachments

cc: Ms. Debra Evans-Ripley, NAVFAC SE (letter only)  
Mr. David Criswell, BRAC PMO SE (letter only)  
Mr. Mark Davidson, BRAC PMO SE (1 hard copy and 1 CD)  
Mr. Stacin Martin, NAVFAC Atlantic (1 hard copy and 1 CD)  
Mr. Pedro Ruiz, NAPR (1 CD)  
Mr. Tim Gordon, US EPA Region II (2 hard copies and 2 CDs)  
Mr. Carl Soderberg, US EPA Caribbean office (1 CD)  
Ms. Wilmarie Rivera, PR EQB (1 hard copy and 1 CD)  
Ms. Gloria Toro-Agrait, PR EQB (1 hard copy and 1 CD)  
Mr. Felix Lopez, US F&WS (1 CD)  
Ms. Brenda Smith, TechLaw, Inc (1 CD)  
Mr. James Pastoric, UXO Pro (1 CD)  
Ms. Karen Vetrano, TRC Environmental (1 CD)  
Mr. Mark Kimes, Baker Environmental (1 CD)  
Ms. Bonnie Capito (Librarian), NAVFAC LANT (1 hard copy and 1 CD for Admin Record)  
File N62470-08-D-1001, CTO JM29 112G02761 (1 hard copy and 1 CD)

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**RESPONSE TO USEPA COMMENTS DATED FEBRUARY 24, 2011  
DRAFT SAMPLING AND ANALYSIS PLAN (SAP) DATED DECEMBER 2010  
ON-SITE CONSTRUCTION SUPPORT FOR DEBRIS REMOVAL  
SWMU 1 – FORMER ARMY CREMATOR DISPOSAL SITE  
NAVAL ACTIVITY PUERTO RICO (NAPR), CEIBA, PUERTO RICO  
EPA ID No. PR2170027203**

**GENERAL COMMENTS**

1. **Comment:** The on-site construction support for debris removal described in this SAP presents Unexploded Ordnance (UXO) Technicians investigating and removing Munitions and Explosives of Concern (MEC) and Material Potentially Presenting an Explosive Hazard (MPPEH) so that the debris removal contractor will have a safe working environment. No sampling and analysis is specified for this clearance/avoidance phase of work. Ensure that, once this process is completed, a thorough sampling process for all potential MEC related contaminants is conducted in Solid Waste Management Unit (SWMU) 1.

**Response:** Agree although no changes to the document were necessary. As already stated in the Executive Summary: "U.S. EPA and PREQB fully participated in review/approval of the subject SAP and will fully participate in planning future phases of a Phase 1 RFI for MEC and MC in both the surface and subsurface, as well as a future Full RFI." Also, as already stated in Worksheet #11, Section 11.4: "Because the presence of MPPEH is known, only one decision rule is needed; proceed with Phase 1 RFI for MEC/MPPEH for the remaining surface and for the subsurface, as well as for MC in appropriate media to determine nature and extent of any munitions-related contamination." Finally, as already stated in Worksheet #17: "No MC sampling is currently planned for the site. Information on MEC/MPPEH found during the debris removal will be evaluated to provide guidance in decisions regarding the necessity for, and the scope and extent of continued investigation of the site for MEC/MPPEH and MC (see Worksheet #11)."

Moreover, while no pre- or post- sampling is included as part of the subject effort, all pertinent locations will be documented via a sub-meter accuracy GPS unit. This includes documentation of the location of any MEC/MPPEH item, including any item requiring blow-in-place procedures (as per Worksheet #17, Section 17.5. Also, for MEC/MPPEH items safe to move, a secure treatment (detonation) area will be established and the location documented using the GPS. GPS information collected will aid in planning future sampling locations. Of note, the Navy is planning on a future analytical sampling planned to support ecological risk and that would likely be the best time to conduct any or all MC sampling related to this effort.

2. **Comment:** The SWMU 1 MEC related work is surface clearance only (Phase 1), concentrating on the debris piles, access routes and equipment lay-down yards. SWMU 1 is referred to as a "landfill" many times in this document, and many similar SWMU areas on other Base Realignment and Closure sites have had relatively shallow burial trenches and pits. These types of trenches and pits could be initially identified with the magnetometers listed for use in this SAP. Revise the SAP to ensure that any areas where the UXO Technicians suspect any burial trenches/pits to be present are recorded, to include global positioning system (GPS) positional data for use in later analysis.

**Response:** Agree. Pertinent worksheets were revised such that after removal of a given debris pile, the Schonstedts and Whites will be utilized to scan over the ground surface and qualitatively determine if shallow subsurface anomalies are present indicative of burial pits or trenches, and, if so, to document the location(s) via sub-meter GPS.

The following worksheet changes were incorporated:

Worksheet #11:

Section 11.3, following 2<sup>nd</sup> sentence, the following was added: *"After completion of the debris removal at a given debris pile, a detector-aided survey of each debris pile footprint will be conducted to search for possible burial pits or trenches."*

Section 11.5, following 2<sup>nd</sup> sentence, the following was added: *"If a suspect burial pit or trench is discovered during the detector-aided survey of any of the debris pile footprints, that information will be recorded with the GPS and in the team leader's logbook."*

Worksheet #14:

Added two tasks added to Detector-Aided Visual Survey definable feature of work as follows:

- *"Perform detector survey of debris pile footprint for the presence of burial trenches or pits"*
- *"GPS the boundaries of suspect burial trenches or pits"*

Worksheet #17:

Section 17.5, 2<sup>nd</sup> sentence, was revised as follows: *"The GPS data will be used to accurately record the positions of suspect MEC/MPPEH and suspect burial trenches or pits."*

Section 17.6, end of 1<sup>st</sup> paragraph, added the following: *"After each debris pile has been removed, a detector survey of the debris pile footprint will be conducted to detect the presence of suspect burial pits or trenches. If a target large enough to be a suspect burial trench or pit is detected, the boundaries of the suspect burial area will be surveyed using the GPS, recorded in the team leader logbook, and reported to the SUXOS for inclusion in the daily report."*

Section 17.7, 6<sup>th</sup> paragraph, 1<sup>st</sup> sentence was revised to read: *"...a description of each MEC/MPPEH item removed, boundaries of suspect burial trenches and pits, and general ..."*

Section 17.11.2, last sentence, was revised to read: *"...field notes, checklists, suspect burial locations, and QC data."*

Worksheet #37:

The 2<sup>nd</sup> sentence was revised to read: *"The UXO team is required to collect information on MEC/MPPEH including suspect burial locations....."*

3. **Comment:** Worksheet #7 indicates that the Tetra Tech Project Quality Assurance Manager (QAM) will perform the data quality review; however, Worksheets #34 and #35 list the

Project Manager and UXO Manager but not the QAM for the data quality tasks. As such, it is unclear if the data quality tasks will be performed by an independent party. Revise the SAP to clarify this information and ensure that data quality reviews will be conducted by an independent party that has not participated in field activities.

**Response:** Internally to Tetra Tech, the QAM serves to ensure that the data quality review process takes place and also provides guidance; the actual data quality review is not conducted by the QAM. The data quality review will be conducted by a technical specialist(s) independent of field data collection. External to Tetra Tech, the Navy RPM will arrange for an independent third-party QA audit of the field work.

The following worksheet clarifications were incorporated:

Worksheet #7:

Responsibilities, Navy RPM bullet, added;

- *"Provides third party QA oversight based on NOSSA audit standards."*

Responsibilities, Project QAM first sentence, revised to read: "Reviews SAP and *provides guidance in* data quality review."

Worksheet #34:

Site-Specific Final Report Preparation and Approval Definable Feature of Work, Responsible for Verification, added: "*Stacin Martin – RPM, Navy.*"

Worksheet #37:

Identify the personnel responsible for performing the usability assessment, 1<sup>st</sup> sentence, was clarified as follows: "The Tetra Tech PM will be responsible for conducting ~~oversee~~ the listed data usability assessments, which will be conducted by a technical specialist who is independent of field data collection."

4. **Comment:** The corrective action presented in the SAP is insufficiently detailed. For example, the SAP does not indicate that EPA will be notified of any significant changes or corrective action. Revise worksheets #6 and #32 to indicate that EPA will be notified of any significant changes or corrective action and provide the timeframe for this notification.

**Response:** The following worksheet change was incorporated:

Worksheet #6:

Last row of table, Corrective action for field program, Procedure, added; "*Navy RPM will then notify EPA/PREQB of any significant changes or corrective actions within 5 days.*"

Other worksheets did not warrant modification, because the worksheet is internal or regulatory notification is already addressed, detailed as follows:

Worksheet #32 not changed as this worksheet identifies internal assessment findings and corrective actions. Significant corrective actions taken as part of Worksheet 32 will be

documented in the Final Report.

Worksheet #17, Section 17.11.1 already states that, "Any unanticipated findings that warrant modification of the UFP-SAP will be brought to the attention of those individuals stated above and the Stakeholders."

Worksheet #37 already states that "The data usability assessments will be reviewed with the Navy RPM, PREAB, and U.S. EPA. The review will take place either in a face-to-face meeting or teleconference depending on the extent of identified deficiencies. If no significant deficiencies are identified, the data usability assessment will simply be documented in the project report and reviewed during the normal document review cycle."

## SPECIFIC COMMENTS

1. **Comment:** Worksheet #10, Section 10.4, SWMU 1 CSM Summary for MEC, page 35: This paragraph states that "chemical contamination at SWMU 1 is being addressed independently; however, although metals contamination was investigated, other munitions-related chemical constituents associated with the site may not have been addressed, and so future Munitions Constituents (MC) sampling may be required." As is noted, this site will require further sampling for MC as well as hazardous toxic waste products. Ensure that this requirement is reflected in any succeeding versions of the SAP.

**Response:** Please see the response to General Comment #1. For the cited comment, the sentence has been revised to read ".....chemical contamination at SWMU 1 is being addressed independently; however, although metals contamination was investigated, other munitions-related chemical constituents associated with the site may not have been addressed, and so *in addition to sampling for hazardous toxic waste products*, future Munitions Constituents (MC) sampling may will be required.

2. **Comment:** Worksheet #12, Measurement Performance Criteria Table, page 45: The Detector-Aided Visual Survey and Manual MEC/MPPEH Operations row and the Measurement Performance Criteria column states "non-detection of MEC/MPPEH would result in failure of QC." As this phrase could be confusing to the reader, revise it to state that, "discovery of any MEC/MPPEH not previously detected would result in failure of QC."

A similar phrase that reads, "non-observation of MEC/MPPEH would result in failure of QC," is found in the Mechanized (low-input) Operations row (page 46). This would be easier to understand if it read, "observation of MEC/MPPEH by QC would result in failure of QC." These phrases are repeated on Worksheet #20 (page 74). Perform a global search for the above phrases and correct them as necessary.

**Response:** Agree. The changes to Worksheets #12 and #20 have been incorporated as requested.

3. **Comment:** Worksheet #17, Section 17.6, Detector-Aided Visual Survey and Manual MEC/MPPEH Operations, page 63: The last paragraph of this section notes that MDAS (material documented as safe) will be demilitarized by crushing the item with the excavator on site. Some ordnance items may be encountered (e.g., a Mk 76 practice bomb) that will

not be crushable. Revise the cited worksheet to describe any other demilitarizing processes that would be used for such items.

**Response:** Agree. The following text has been added to Section 17.6, last paragraph: *"If a given MDAS item cannot be crushed by the excavator, it will be treated with explosives in order to affect a demilitarization of the item. MDAS items that cannot be treated in this manner will be secured on site to be addressed during future operations. Any MDAS item left on site will be reported to the NAPR POC and security will be provided with the item's location and description."*

4. **Comment:** Worksheet #17, Section 17.8, MEC Management/Treatment, page 66: A secure treatment area for explosive treatment of MEC/MPPEH and Blow-in Place (BIP) procedures is described in paragraphs 17.8.1 and 17.8.3 (page 69). However, these sections lack detail regarding contamination evaluations. Revise the sections to describe any site evaluations for current contamination and controls to prevent continued contamination at the demolition site(s). Also, state whether soil samples will be collected at the beginning and end of demolition operations.

**Response:** Soil samples will not be collected at any time during the subject work effort. However, as noted in the response to General Comment #1, detonation locations will be documented with a sub-meter capability GPS such to aid in planning a future sampling event(s), if agreed upon between the Navy and EPA/PREQB.

5. **Comment:** Worksheet #17, Section 17.8.3, MEC Treatment, page 69: The described treatment for MEC/MPPEH is by detonation, although this process may not be fully effective on propellant filled munitions such as rocket motors. Revise the worksheet to describe any additional procedures, such as burning, that will be required to remove all energetic material and subsequently certify the ordnance as safe.

**Response:** Although it is agreed in general that burning is a more effective procedure for rocket motors in large quantities and disposed of all at once, for this particular project at SWMU 1, items encountered during this phase of operation are expected to be in small number and are to be disposed of each day if possible. This makes disposal by detonation the more efficient procedure because it takes less preparation time and, therefore, would consume less time each day to complete. The issue about what to do with propellant that survives the first detonation is already addressed in Tetra Tech SOP 7 for demolition operations, section 5.1, 9<sup>th</sup> bullet, which states *"After each series of detonations, a search shall be made of the surrounding area for hazardous items. Items such as lumps of explosives or unfuzed ammunition may be picked up and prepared for the next shot. Fuzed ammunition or items that may have internally damaged components will be detonated in place, if possible."* SOP 7 is included as part of Appendix C to this SAP. Moreover, as stated in the Conceptual Site Model of Worksheet #10, Section 10.4.2, only inert ordnance was disposed of at SWMU 1 and so propellant, if present at all, is expected in only small quantities.

6. **Comment:** SAP Worksheet #29 – Project Documents and Records Table, Pages 85-86: This table indicates that certain documents will be maintained in the Project File, but does

not indicate where the project file is located or how long project files will be stored. Revise the table to provide this information.

**Response:** The project data and records are stored for the life of the Navy CLEAN Tetra Tech contract prior to archiving in secure project files audited for accuracy and completeness, and eventually handed over to the Navy for long-term storage. (Also of note, an Administrative Record is maintained for NAPR). The following footnote will be added to Worksheet #29 associated with the last column header "Location/Where Maintained" as follows: "(1) The secure project documents and records will be stored and secured by Tetra Tech at a third-party professional document storage firm, Business Records Management (BRM). The BRM repository is located at 651 Mansfield Ave., Pittsburgh, PA 15220. The secure project documents and records will be stored indefinitely or until EPA/PREQB approves of disposing of the files."

## MINOR COMMENTS

1. **Comment:** Acronyms, page 2: Some of the listed acronyms have minor issues with their definitions. These acronyms and the correct definitions are:

ATF: Bureau of Alcohol, Tobacco, Firearms, and Explosives  
DDESB: Department of Defense Explosives Safety Board  
HFD: Hazardous Fragment Distance

Correct these acronyms as noted.

**Response:** Agree. The main text instances have also been corrected.

2. **Comment:** References, page 5: The reference which reads as follows is out of date: "Department of Defense (DoD), Feb 2008. *DOD Ammunitions and Explosives Safety Standards DOD 6055.9-STD.*" The correct cite is: "Department of Defense (DoD), Feb 2008 (administratively reissued August 4, 2010). *DOD Ammunitions and Explosives Safety Standards DoDM 6055.09-M.*" Revise this reference as noted.

**Response:** Agree. The main text instances have also been corrected.

3. **Comment:** SAP Worksheet #22 – Field Equipment Calibration, Maintenance, Testing, and Inspection Table, Page 76: There is an undefined table note placed after the "Activity" column-header. Revise the table to define this table note or remove it from the table.

**Response:** The "(1)" has been removed from the Activity table header.

**RESPONSE TO PREQB COMMENTS DATED JANUARY 14, 2011  
DRAFT SAMPLING AND ANALYSIS PLAN (SAP) DATED DECEMBER 2010  
ON-SITE CONSTRUCTION SUPPORT FOR DEBRIS REMOVAL  
SWMU 1 – FORMER ARMY CREMATOR DISPOSAL SITE  
NAVAL ACTIVITY PUERTO RICO (NAPR), CEIBA, PUERTO RICO  
EPA ID No. PR2170027203**

1. **Comment:** SAP Worksheet #3, Distribution List, Page 17: Please change the phone extension of PREQB RPM, Wilmarie Rivera. The phone extension is 6129.

**Response:** Agree.

2. **Comment:** Page 58, Section 17.2.4: The statement in this section that, "If non-site personnel or non-essential non-UXO personnel enter an EZ, all MEC operations will cease until the EZ is re-established", is incorrect. Both the U.S. Navy and the U.S. Army Corps of Engineers allow a specific category of personnel, "authorized visitors", to enter a munitions response EZ under certain specific conditions. The U.S. Navy requirements for entry into a munitions response EZ are contained in Enclosure 3, "Guide for Preparing an Explosives Safety Submission", to NOSSA Instruction 8020.15B "Explosives Safety Review, Oversight, and Verification of Munitions Responses" (January 26, 2009) and are copied below:

"6.2.4. Describe the MRS EZ access protocol. In general, access to EZs is limited to personnel essential to the operation being conducted. However, under specific conditions and on a case-by-case basis, authorized visitors may be granted access to the EZ when operations are being conducted. In addition to general munitions response site access requirements, formal written procedures addressing EZ access, including authorized visitor access, must be developed in support of response actions involving MEC and must address the following requirements:

Access to an EZ while munitions response operations are occurring is limited to essential personnel and authorized visitors.

The Unexploded Ordnance Safety Officer (UXOSO) is responsible for conducting an operational risk management (ORM) assessment in accordance with reference (f) prior to initiating response actions involving MEC. In addition, the UXOSO must determine the maximum number of persons (essential personnel and authorized visitors) that can be in the EZ at one time. The ratio of UXO-qualified escorts to visitors will be determined by the UXOSO based on this site-specific operational risk analysis.

Based on the risk posed by the munitions response operation underway, the UXOSO may determine that access to the EZ is unsafe for visitors. However, every effort should be made to accommodate the authorized visitor's needs.

With concurrence of the responsible project manager, the UXOSO will grant EZ access to authorized visitors. Access to the site will be based upon the operational risk analysis of the scheduled MEC operations and availability of escorts, as well as a demonstrated visitor need and subsequent completion of visitor safety briefings.

Persons requiring access to the EZ must demonstrate a legitimate need for access and obtain authorization from the responsible project manager and UXOSO. At a minimum, the request for authorization will include: names of the individual requesting access, the identification of emergency contacts for these individuals, purpose of visit; task(s) to be performed; and rationale to support EZ access. Persons requesting access must submit their request to the responsible project manager and UXOSO prior to the proposed date of the site visit. This advance notice will allow time for the UXOSO to support the visit request by assigning a qualified escort, conducting an operational risk analysis on the operations planned for the date of the site visit, and preparing a visitor site-specific safety briefing for the planned operations.

Prior to entry, all authorized visitors must receive a site-specific safety briefing describing the specific hazards and safety procedures to be followed within the EZ for operations underway that work day. Each authorized visitor must acknowledge receipt of this briefing in writing.

Authorized visitors to the EZ must be escorted at all times by a UXO-qualified person assigned to the project.

Any authorized visitor that violates the established safety procedures will be immediately escorted out of the EZ and/or site for their own protection and to protect essential personnel working at the site.

Other requirements, such as Occupational Safety and Health Administration (OSHA), may also apply."

PREQB intends to comply with this guidance and may request entry into the EZ in our official capacity as environmental regulators. Please clarify this in the work plan and include the requirements for potential PREQB entry into the EZ during site operations as authorized visitors.

**Response:** EPA/PREQB and others as applicable are welcome to visit the site during field operations. EZ access protocol is addressed in detail in the ESS (internal Navy document not provided for regulatory review) and that text has now been copied to SAP Worksheet #17, paragraph 17.2.4, as follows:

"EZ Access Protocol

*Access to the EZ will be limited to personnel essential to the operation being conducted. However, under specific conditions and on a case-by-case basis, authorized visitors may be granted access to the EZ when operations are being conducted. In addition to general Munitions Response Site (MRS) access requirements, the following procedures addressing EZ access, including authorized visitor access, will be enforced:*

*a. Access to the EZ while munitions response operations are occurring is limited to essential personnel and authorized visitors.*

*b. The UXOSO will conduct an Operational Risk Management (ORM) assessment in accordance with OPNAVINST 3500.39 series (Department of the Navy) prior to initiating response actions involving MEC. In addition, the UXOSO will determine the maximum number of people (essential personnel and authorized visitors) that can be in the EZ at one*

time. The ratio of UXO-qualified escorts to visitors will be determined by the UXOSO based on this site-specific operational risk analysis.

c. Based on the risk posed by the munitions response operation underway, the Unexploded Ordnance Safety Officer (UXOSO) may determine that access to the EZ is unsafe for visitors. However, every effort will be made to accommodate authorized visitors' needs.

d. With the concurrence of the NAPR POC, the UXOSO will grant EZ access to authorized visitors. Access to the site will be based on the operational risk analysis of the scheduled MEC operations and availability of escorts, as well as a demonstrated visitor need and subsequent completion of visitor safety briefings.

e. People requiring access to the EZ must demonstrate a legitimate need for access and obtain authorization from the NAPR POC (Environmental Office) and UXOSO. At a minimum, the request for authorization will include the name of the individual requesting access, identification of emergency contacts for the individual, purpose of visit, task(s) to be performed, and rationale to support EZ access. Persons requesting access must submit their request to the NAPR POC and UXOSO prior to the proposed date of the site visit. This advanced notice will allow time for the UXOSO to support the visit request by assigning a qualified escort, conducting an operational risk analysis on the operations planned for the date of the site visit, and preparing a visitor site-specific safety briefing for the planned operations.

f. Prior to entry, all authorized visitors must receive a site-specific safety briefing describing the specific hazards and safety procedures to be followed within the EZ for operations underway that work day. Each authorized visitor must acknowledge receipt of this briefing in writing.

g. Authorized visitors to the EZ must be escorted at all times by a UXO-qualified person.

h. Any authorized visitor that violates the established safety procedures will be immediately escorted out of the EZ and/or site for his/her own protection and to protect essential personnel working at the site."

3. **Comment:** Worksheet #31, Page 89: The entries for the assessment "Manual MEC/MPPEH Removal" need to be filled in.

**Response:** Nothing is missing; the row at the top of Page 89 was split from the bottom of the previous page. The table has been reformatted.

**ADDITIONAL NAVY CHANGES CONSISTENT WITH FINALIZATION OF THE ESS  
DRAFT SAMPLING AND ANALYSIS PLAN (SAP) DATED DECEMBER 2010  
ON-SITE CONSTRUCTION SUPPORT FOR DEBRIS REMOVAL  
SWMU 1 – FORMER ARMY CREMATOR DISPOSAL SITE  
NAVAL ACTIVITY PUERTO RICO (NAPR), CEIBA, PUERTO RICO  
EPA ID No. PR2170027203**

*Concurrent with regulatory agency review of the draft SAP, the Department of Defense Explosives Safety Board (DDESB) was reviewing the Explosives Safety Submission (ESS), an internal Navy safety document. As a result, one significant change to the ESS warranted corresponding changes to the SAP concerning remote pull by the excavator, as follows:*

For the remote pull by the excavator of debris in any pile that is too heavy to remove items manually, the K24 with excavator shielding rather than the K40 with no excavator shielding will be the governing ESQD (SAP Worksheet #14, Worksheet #17 and Table 17-1 were changed). Also, the following text was added to Section 17.6, middle of the 1<sup>st</sup> paragraph: *"The debris removal equipment will be shielded using the standards provided in the fragmentation data review form for the MGF. UXO technicians observing the remote pull will watch from behind a shield located at the K24 (64-foot) mark; this shield will also use the standards given in the fragmentation data review form for the MGF."*