

Responses to the Comments from the Lead RPM, RPM, and ROICC

Dave Godsey's (Lead RPM) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
Draft Work Plan					
1.	1.4	1-13		Section refers to a figure 1-6, which is missing. The figure in question is also found in App C as figure 2-1.	Comment noted and corrected.
2.	4.5	4-3		Need to add to this section sensitive habitat avoidance awareness training for site workers.	Comment noted and corrected.
3.	4.7.3	4-7		2nd line - typo "he" should be "the"	Comment noted and corrected.
4.	4.10.4	4-23		The use of non-Navy soil from ponds 4M or 4S for backfilling needs to be run by Navy attorneys to see if we can accept such soil at no cost. See also App A, section 2.8, page A2-5 and App H, page H6-6, sec 6.8	Text will be left as is to allow flexibility, pending future determination by the DON.
5.	4.12.1	4-24		Need to state that RCRA hazardous waste will first be treated to become non-RCRA haz waste then placed in the CAMU.	Document text has been revised to reflect the following for all excavated MCFR and 4S Outfall soil: characterization (DI WET), stabilization (for waste with a DI WET lead solubility above 7.5 mg/L only), and transportation to IA H1 for placement as landfill cap fill within the containment area.
6.	Appendix D			Why are the pages in this section numbered starting with "A".	Comment noted and corrected.
7.	Appendix D Section 2.1.1	A.2-2	2nd	There are sensitive habitats within the MCFR (two locations). See App f page F3-3.	Comment noted and corrected.

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8.	Appendix F	F2-2		Substitute John Kowalczyk for Duane Rollefson.	Comment noted and corrected.
9.	Appendix F Section 10.2	F10-1		Substitute John Kowalczyk for David Godsey	Comment noted and corrected.
10.	Appendix H Section 1.6	H1-4		Change David Godsey's area code to 619 vs 707	Comment noted and corrected.
11.	Appendix H Section 6.10	H6-10	1st	A-180 keys will be maintained by the CSO. A duplicate set will be issued to the SUXOS at the start of field operations and returned at completion.	Comment noted and corrected.

John Kowalczyk's (RPM) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
Draft Work Plan					
1.		binder cover		Add latest NAVFAC logo to binder and cover page.	Comment noted and corrected.
2.		Title page		Provide signature page signed by registered professional.	Comment noted and corrected.
3.	TOC	ii		Change Section 4.8.1 to title case.	Comment noted and corrected.
4.	TOC	iii		Section 5.0 page numbers should start at "5-1" to be consistent with other sections.	Comment noted and corrected.
5.	List of Appendices	iv		In title of Appendix A, change "Recovery" to "Removal".	Comment noted and corrected.
6.	List of Figures	v		Change title of Fig. 4-1 to "Decision Flow Diagram".	Comment noted and corrected.
7.	Abbrev.	vii		NFECSW is "Naval Facilities Engineering Command Southwest", i.e., remove "Division". Do a global change throughout document text and title blocks on figures.	Comment noted and corrected.
8.	1.0	1-1	3	See comment above.	Comment noted and corrected.
9.	1.0	1-2	1	In first sentence, replace "}" with "J".	Comment noted and corrected.
10.	1.1	1-2	1	In first sentence, update reference to "Final Status Summary Report". Date is November 30, 2004.	Comment noted and corrected.
11.	1.2.2	1-8	1	See comment # 11.	Comment noted and corrected.

John Kowalczyk's (RPM) Comments

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12.	Figure 1-3			My Figure 1-3 appears out of focus and the distinction between "1-foot excavation" and "2-foot excavation" grids is not clear—particularly at the rifle range. Figure D.4-1 in the SAP is much more clear and focused.	Comment noted and corrected.
13.	1.2.2	1-10		This section discusses "high-risk" and "low-risk" areas and refers to grids on Figure 1-3. However, the grids on the figure are color-coded for depth of excavation and are not characterized as "high-risk" and "low-risk". Are the 1-foot excavation areas designated "low-risk" and everything else "high-risk"?	References to "high risk" and "low-risk" have been deleted from the text.
14.	1.2.2	1-10		Specific Task 3. I assume that "low-risk" areas are the green grids with the purple border (excavation to 1 foot). I do not count 13 of these grids in the central and north pistol range and rifle range. Some grids appear to have both black and purple borders at the rifle range.	References to "high risk" and "low-risk" have been deleted from the text. Figure has been modified to better delineate grid excavation depths.
15.	2.0	2-1	1	Change "AM" to "Final AM."	Comment noted and corrected.
16.	2.0	2-1	2	First sentence refers to an HHRA but the reference list indicates the document is an EE/CA.	Reference to the EE/CA HHRA has been clarified.
17.	3.3	3-5	2	SOP-MCFR-01 is "MEC Removal, Storage, and Disposal."	Comment noted and corrected.

John Kowalczyk's (RPM) Comments

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18.	4.6.1	4-5		Three bullet items. See comment # 14.	Comment noted and corrected.
19.	4.7.3	4-7	1	In first sentence change "he" to "the".	Comment noted and corrected.
20.	4.7.4	4-7		Did the levee material originate from the dredge spoils? How high is the levee now? Why max. depth of 4 feet for this work?	Text has been changed to reflect the removal of all "MEC-like" anomalies below 4 feet (note that the statement of Work specified a 4 ft maximum clearance depth). Other comments noted and corrected.
21.	4.7.5	4-8		How deep are we prepared to go in the outfall area for this work?	Workplan assumes that all anomalies are removed, regardless of depth.
22.	4.8.1	4-11		Change case of title to title case. See comment # 3.	Comment noted and corrected.
23.	4.8.8	4-18		Based upon Figure 1-3, the grid lines are not oriented to true north but more likely to some "base north" or "reference north" for convenience. This is fine, but specify that the geophysical survey transects will be parallel to the established grid lines and not conducted on "North/South" transects.	Comment noted and corrected.

John Kowalczyk's (RPM) Comments

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24.	4.10.3	4-22		Discuss the purpose of collecting twenty grab water samples where we have no applicable numerical standards and the samples may not be representative of the site groundwater. Is there a benefit associated with the cost of this task? We do not specify decision rules in the DQOs.	Groundwater sampling was required by the Statement of Work, Item 4.3.2. The purpose is preliminary characterization that will allow further decision-making. The groundwater issues are clarified in the Data Quality Objectives presented in the SAP Table D.1.-2. The DQO Step 5 addresses decision-making as follows: If groundwater sample results show that groundwater at the site may be contaminated, then a recommendation may be made for the installation of permanent groundwater monitoring wells. If groundwater sample results do not indicate that contamination may be present, then no further groundwater monitoring may be required.
25.	4.11	4-23	2	Is the stabilizing agent specified elsewhere? Are the likely agents lime or cement?	Changed to reflect Portland cement or similar agent, based on treatability study.
26.	4.12.6	4-26	2	Without quantifying, what are the expected liquid waste sources? Will the disposition for different sources be different?	Waste sources could be decontamination water, purge water, etc. that would be disposed of according to characterization data.
27.	5.0	5-28		Start page number at 5-1.	Comment noted and corrected.
28.	5.0	5-28		FWENC. 2003c. Update this to "Final Action Memorandum." Update date to September 16.	Comment noted and corrected.
29.	5.0	5-28		TtFW. 2004. Update this to "Final." Update date to November 30.	Comment noted and corrected.

John Kowalczyk's (RPM) Comments

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30.	5.0	5-29		Specify month of the draft Site-Specific Health and Safety Plan.	Comment noted and corrected.
31.	Figure 1-3			Remove inaccurate scale note: "SCALE: 1"=100' ". Original map may have been reduced for this work plan.	Comment noted and corrected.
32.	Figure 1-5			Update schedule dates as necessary.	Comment noted and corrected.
Appendix A: SOP MCFR-01					
33.	Attach. 3			Should motor vehicle inspections, in this context, include a check for seat belts?	Although vehicle inspection points conform with the requirements of DD Form 626 (Motor Vehicle Inspection-Transporting Hazardous Materials), a seat belt inspection point has been added.
Appendix D: SAP					
34.	TOC	A.i		Page number prefixes should be "D" not "A".	Comment noted and corrected.
35.	TOC	A.iii		References section should start page numbering at D.13-1.	Comment noted and corrected.
36.	List of Tables	A.iv		Table is missing from list. Insert Table D.4-1 Summary of Sampling and Analysis.	Comment noted and corrected.
37.	List of Figures	A.iv		Figure is missing. Insert Figure D.6-1 Chain-of-Custody Form.	Comment noted and corrected.
38.	Abbrev.	A.vi		NFECSW is "Naval Facilities Engineering Command Southwest", i.e., remove "Division". Do a global change throughout document text and title blocks on figures.	Comment noted and corrected.

John Kowalczyk's (RPM) Comments

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39.	1.0	A.1-1	1	See comment above.	Comment noted and corrected.
40.	1.1	A.1-1	1	At first bullet, remove stray "e".	Comment noted and corrected.
41.	1.2	A.1-4	1	The organization of tasks is unclear. The first set of bullet items is called "General Tasks" and the next set is called "Task 2".	Comment noted and corrected.
42.	1.2	A.1-4		Under General Tasks, change the groundwater bullet to: Preliminary characterization of groundwater at the site.	Comment noted; text corrected as follows: "Collect groundwater at the site for preliminary characterization."
43.	1.2	A.1-5		Under Task 4. I count 47 grids not 46.	Forty six characterization sampling points are identified as black dots on Figure D.4-1.
44.	4.3	A.4-2	3	See comment above regarding the number of grids.	Forty six characterization sampling points are identified as black dots on Figure D.4-1.
45.	4.3	A.4-2	4	Section 4.1 states heterogeneity of soils in stockpiles precludes collecting duplicate soil samples. Duplicate soil samples for assessment and confirmation sampling can also provide ambiguous results.	Comment noted with exception. Heterogeneity of stockpiled soil has been established during previous TCRA. The same extreme heterogeneity is <u>unlikely</u> to be encountered in the excavated surface soil. Field duplicates of soil are always ambiguous, particularly for metal analysis, however they must be collected for confirmation and assessment projects to satisfy the EPA data quality requirements. That is why confirmation soil samples will be collected from the surface of the soil that has undergone the removal of contamination. It would be safe to assume the surface soil does not have any metal contamination and is in this sense a homogeneous medium.
46.	5.3.2	A.5-2	1	See comment above.	See response above.

John Kowalczyk's (RPM) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
47.	8.2.2	A.8-3	1	Reporting limits are specified in Table D.8-1	Comment noted and corrected.
48.	8.2.3	A.8-3	1	QC limits are specified in Table D.8-2.	Comment noted and corrected.
49.	9.5.5	A.9-6	2	Replace FWENC with Weston.	Comment noted and corrected.
50.	9.6	A.9-6	1	Replace FWENC with Weston.	Comment noted and corrected.
51.	10.3	A.10-2	1	Replace FWENC with Weston.	Comment noted and corrected.
52.	13.0	A13-2		Start numbering at page D.13-1.	Comment noted and corrected.
53.	Figure D.4-1			Remove inaccurate scale note: "SCALE: 1"=100' ". Original map may have been reduced for this work plan.	Comment noted and corrected.
54.	Figure D.7-1			In Organization Chart, replace "Southwest Division" with "NFEC SW".	Comment noted and corrected.
55.	Table D.1-3			Step 2, Item 3. The proposed lead treatment standard is 7.5 mg/l.	Comment noted and corrected.
56.	Table D.1-3			Step 1. There should be some mention that groundwater is potentially affected by range operations.	Comment noted. The following has been added: 6. Sample groundwater at the site to determine if it may have been affected by MCFR operations..
57.	Table D.1-3			Step 2. No numerical standards apply to the grab groundwater samples as the collection method is not designed to retrieve representative groundwater.	Comment noted. The following has been added: No numerical standards apply to the grab groundwater samples as the collection method does not allow the collection of samples representative of the formation water.

John Kowalczyk's (RPM) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
58.	Table D.1-3			Step 3. Results for the grab groundwater samples will be used to preliminarily characterize groundwater in the immediate area of the former ranges.	Comment noted and corrected.
59.	Table D.1-3			Step 5, Item 3 states that no decisions will be made based upon the results of the preliminary groundwater characterization. There could be something such as a recommendation to install permanent GW monitoring wells if elevated metals are reported or recommendation to not conduct further GW sampling in the area if results are not elevated above background.	<p>Comment noted with exception. A comparison of groundwater metal results to background levels constitutes the application of numerical standards, which is contrary to Step 2. In addition, this comparison is not required by the Scope of Work. The text has been amended as follows:</p> <p>3a. If groundwater sample results show that groundwater at the site may be contaminated, then a recommendation may be made for the installation of permanent groundwater monitoring wells.</p> <p>3b. If groundwater sample results do not indicate that contamination may be present, then no further groundwater monitoring may be required.</p>
60.	Table D.5-1			For groundwater, specify that the samples for Title 22 metals will be filtered in the field.	Comment noted and corrected.
Appendix H: Explosives Safety Submission					
61.	List of Figures	H-iii		Title of Fig. 2-5 should be "Project Q-D Arcs".	Verified and corrected figure titles throughout document for consistency.

John Kowalczyk's (RPM) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
62.	Abbrev.	H-v		NFEC SW is "Naval Facilities Engineering Command Southwest", i.e., remove "Division". Do a global change throughout document text and title blocks on figures.	Comment noted and corrected.
63.	1.2	H1-1	1	Add the PRC, 1994 reference to the list of references in Section 13.	Corrected reference date to Sept 1995 and added to list of references.
64.	1.2	H1-2		Would a brief summary of the TtFW work be valuable here? If so, reference the TtFW Final Status Summary Report of 2004.	Added a summary of TtFW work referenced to the TtFW final report. Added the TtFW final status summary report to the list of references in Section 13.
65.	1.3	H1-3	2	Add reference to the TtFW Final Status Summary Report of 2004	Referenced TtFW final report.
66.	Figure 2-8			At this scale, the superimposed grid is larger than 50' by 50'.	Figure 2-8 scale was corrected.
67.	Figure 2-11			At least one of the draft work plan binders sent to the BRAC office did not have this figure in the ESS.	All figures will be included in future copies.

Izzat Amadea's (ROICC) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
Draft Work Plan					
1.	4.4	4-2	4.4	Change the title of this paragraph to: KICK-OFF/PRE-CONSTRUCTION MEETING. Also change the last sentence to read: ROICC will prepare and distribute meeting agenda and minutes.	Comment noted and corrected.
2.	Appendix C	C7-9	7.4	Change the title of this paragraph to: KICK-OFF/PRE-CONSTRUCTION MEETING. Also change the last sentence to read: ROICC will prepare and distribute meeting agenda and minutes. (assumption is that this is the same meeting referenced in Section 4.4 of Work Plan).	Comment noted and corrected.
3.	Appendix C	C2-2	Fig 2-1	Add to Project Organization Chart an Alternate Site QC Manager.	Comment noted and corrected.
4.	Appendix C		Attachment 2	Add a Letter of Designation for an Alternate Site QC Manager.	Letter of Designation added for the designated Alternate Site QC Manager, Matt Lumsden.
5.	Appendix F	F2-2	2.3	Replace Duane Rollefson with John Kowalczyk. Add cell phone number for Izzat Amadea: 510-755-5876.	Comment noted and corrected.
6.	Appendix F		Attachment 1	Third paragraph: Add: ROICC and CSO after (RPM).	Comment noted and corrected.

Izzat Amadea's (ROICC) Comments

No.	Section	Page	Para-graph	Comment	Comment Reply
Draft Site-Specific Health and Safety Plan					
7.	Acronyms	Vii		Change the acronym for ROICC to: Resident Officer.....instead of Regional Officer.	Comment noted and corrected.
8.	2.5	2-2	4 th bullet	Specifies is mis-spelled.	Comment noted and corrected.
9.	4.7	4-7		Documentation: NOI Form is not enclosed in Appendix A. Also add: Navy Contractor Significant Incident Report (CSIR) Form to Appendix A.	Comment noted and corrected.
10.	13.1	13-1		Bullets 5 through 9 do not seem to fall under expressly forbidden practices.	Comment noted and corrected.
11.	Tables		Table 1	Change US Navy Regional Officer in Charge of Construction to: US Navy Resident Officer Change spelling of Izzat Ahmadiyya to Izzat Amadea. Change Cell Phone Number from 510-915-4915 to 510-755-5876..	Comment noted and corrected.
12.	Tables		Table 2	Change: George Young to Bob Palmer and phone number to 707-333-8197	Comment noted and corrected.
13.	Appendix E			Add blast shield requirements where applicable to AHAs and equipment inspection checklists.	Comment noted and corrected.