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NAS CORPUS CHRISTI
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LETTER AND RESPONSE FROM TETRA TECH REGARDING U S NAVY COMMENTS TO
DRAFT SITE INSPECTION REPORT AT GUNNERY TRAINING COMPLEX NAS CORPUS
CHRISTI TX
06/07/2010
TETRA TECH NUS, INC.



July 7, 2010

Project Number 112G00866

Ms. Leanna Woods Poon
NAVFAC SE
Environmental Restoration
Building 903, P.O. Box 30
Jacksonville, FL 32212

Reference: CLEAN Contract N62467-04-D-0055
Contract Task Order No. 0087

Subject: Transmittal of Response to Navy Comments to the Draft Site Inspection Report for
Gunnery Training Complex
Naval Air Station Corpus Christi
Corpus Christi, Texas

Dear Ms. Woods Poon:

Enclosed please find one copy of Tetra Tech NUS, Inc. (TtNUS) responses to Navy comments to the Draft Site Inspection Report for the Gunnery Training Complex at Naval Air Station Corpus Christi, Corpus Christi, Texas.

If you have any questions, please contact Larry Basilio (832-251-6018) or me at (832) 251-6023.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Grim' with a flourish at the end.

G. Kenneth Grim, P.G.
Task Order Manager

GKG:LB:llg

Enclosure

c: Mr. Gary LeFlore, NASCC (electronic)
Mr. L. Basilio, TtNUS, Houston, TX (electronic)
Mr. C. Pike, TtNUS, Pittsburgh, PA (electronic)
File 112G00866 (4.1)

**Response to Comments on Draft Site Inspection Report for the Gunnery Training Complex
NAS Corpus Christi, Corpus Christi, Texas**

I. Reviewer: Leanna Woods Poon, Navy RPM

Comment #	Section/Page	Paragraph / Line/Issue	Comment	C,D,E ⁽¹⁾	Response	A or D ⁽²⁾
1	Sec. 2.4		<p>3 buildings devoted to chemical warfare training.</p> <p>Where were these?</p>	E	<p>According to a 1942 drawing provided in the Preliminary Assessment, the buildings were located approximately 250 feet southeast of the Air Blast/Synchronized Gun Range.</p> <p>The former building locations were not included in any of the areas sampled during the SI.</p> <p>The PA also stated, "The former chemical warfare training area will not be assessed as part of this PA. However, during the site visit, the Malcolm Pirnie field team did perform site reconnaissance of the former chemical warfare training area. The field team walked the entire site area and did not observe any evidence of the former structures associated with the site, and no chemical warfare materiel was observed. The area is currently covered in grasses that are periodically maintained. however "</p>	
2	Sec. 2.4		<p>The complex was constructed with a service road running down the center of the complex.</p> <p>Is this the road that Tara pointed out during the partnering meeting?</p>	E	<p>Tetra Tech is not sure if this is the road Tara referred to.</p>	

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3	Sec. 2.4.6		Also remobilized to do confirmatory sampling.	C	The text will be revised accordingly.	
4	Sec. 3.2.1		Where was the asphalt in the collection area?	C	The text will be revised to indicate that samples SAR 29, 30, 36, and 37 were moved or not sampled because the planned locations were inaccessible due to standing water.	
5	Sec. 3.2.1		Sieved in the lab after drying out?	E	Soil samples were not sieved at the laboratory. The samples were analyzed as-is at the laboratory. Moisture content is noted in the laboratory reports and the samples are reported on a dry weight corrected basis.	
6	Sec. 3.2.2		Sieved in the lab after drying out?	E	Refer to response to Comment #5.	
7	Sec. 3.2.2		Based on XRF results, Project Team selected 19 samples for laboratory analysis. Samples were then sent to lab (on ice) <ol style="list-style-type: none"> 1. 2 firing line composite samples 2. 2 locations where field duplicate samples were collected 3. 16 other locations that exhibited elevated field XRF lead readings Doesn't add up (2+2+16)	C	Text will be revised to indicate 15 other locations were selected.	
8	Sec. 3.2.3		Sieved in the lab after drying out?	E	Refer to response to Comment #5.	

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9	Sec. 3.2.3		4 samples on hold were analyzed for lead exceedance ABSSS003, 006, 025, and 026 Additional 4 or repeat?	E	ABSSS003, 006, 025, and 026 are four additional samples that were removed from hold and analyzed.	
10	Sec. 3.2.4		Where was the asphalt in the collection area?	C	The text will be revised to indicate that sample 2C was moved due to vegetation and samples NTR5A, 5B, 5C, 5D, 12E, and 13A were moved because the planned locations were inaccessible due to standing water.	
11	Sec. 3.2.4		Sieved in the lab after drying out?	E	Refer to response to Comment #5.	
12	Sec. 3.2.5		Where was the asphalt in the collection area?	C	The text will be revised to indicate that samples STR5C and 6C were moved off of Perimeter Road to the side of the road.	
13	Sec. 3.2.5		Sieved in the lab after drying out?	E	Refer to response to Comment #5.	
14	Sec. 3.2.6		Where was the asphalt in the collection area?	C	The text will be revised to indicate that samples SKR 5D, 6B, 6E, 9A, 9C, and 9D were moved because the planned locations were inaccessible due to asphalt, concrete and rubble piles; samples 7C, 9B, 10C, and 11A were moved off of the road to the side of the road; samples 7E and 12B were moved due to vegetation.	
15	Sec. 3.2.6		Sieved in the lab after drying out?	E	Refer to response to Comment #5.	
16	Sec. 3.2.7		Where was the asphalt in the collection area?	C	The text will be revised to indicate that samples CSR17C, 22C, and 22D were not sampled due to vegetation; samples 9B, 9C, 11B,	

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					and 17E were moved due to vegetation; samples 43, 44, 49, and 50 were moved from planned locations based on actual field conditions/observations.	
17	Sec. 3.2.7		Sieved in the lab after drying out?	E	Refer to response to Comment #5.	
18	Sec 3.5.3		Temperature Blanks Not collected? Could be helpful in proving samples were not compromised.	E	Temperature blanks were included in each cooler of samples sent to the laboratory.	
19	Sec 4.0		Do all the J flags represent samples extracted outside of the 14 day holding time? Are there no other reasons for a J? If there are other reasons, please identify holding time Js vs other Js.	C	The specific J flagged samples extracted outside of the holding times are discussed in Sections 4.3.3 and 4.3.7. Additional footnotes will be added to Tables 4-3 and 4-7 to identify the reason for the J flags for these samples. Some of the samples analyzed have been assigned J flags by the Data Validator. Reasons a J flag was assigned may include percent recoveries (%R) in the matrix spike/matrix spike duplicates (MS/MSD) being outside the QC limits, relative percent differences (RPDs) were outside the QC limit, or field duplicates precision was outside the QC limit. There may also be additional reasons why the Data Validator assigned J flags to	

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					samples. The Validator assigned flags are listed in the Data Validation reports. It should be noted that the data though flagged is considered valid and usable.	
20	Table 4-1		3 rd column should be Tier 2. Does not show NG results (55 and 54). Does not show results for 26,29,31,42,43,46,or 53.	C	The 3 rd column contains both Tier 1 and Tier 2 PCLs. The Tier 2 PCLs are footnoted. The column header will be changed to Tier 1/2. Page 2 of 2 was inadvertently left off. It will be added.	
21	Table 4-2		3 rd column should be Tier 2.	C	The 3 rd column contains both Tier 1 and Tier 2 PCLs. The Tier 2 PCLs are footnoted. The column header will be changed to Tier 1/2.	
22	Table 4-3		3 rd column should be Tier 2.	C	Refer to response to Comment #21.	
23	Section 5.3.2		And then NFA for PAHs?	E	Once the PAH exceedance is removed, the site can be recommended for no further action.	
24	Section 5.3.2		Do we need to remove 2810 mg/kg? Interim Removal?	E	The 95 percent UCL of 445.6 mg/kg is less than the TRRP Tier 1 TotSoilComb PCL and Tier 2 soil to groundwater PCL. Assuming the TCEQ accepts the 95 percent UCL rationale, no further action would be required. However if the TCEQ does not accept the argument, the size of	

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					the area is small enough that an interim removal action could be conducted.	
25	Table 4-4		3 rd column should be Tier 2.	C	Refer to response to Comment #21.	
26	Figure 4-4a		There are two 7As, one should be 7B 7C should be highlighted green	C	The figure will be revised.	
27	Figure 4-4b		The letters of 7A and 7E should not be highlighted green. The symbol of 18C should be highlighted green. There are two 18Es, eliminate one.	C	The figure will be revised. One of the 18E's is 12E which was moved due to standing water.	
28	Section 5.4.2		Can we drop out Indeno(1,2,3-cd)pyrene with an interim removal? Is this asphalt?	E	Indeno(1,2,3-cd)pyrene is one of four PAHs that exceed the PCL. Dropping this COC would still leave three other PAHs. An old asphalt road runs through the former trap range. Grid 7 is adjacent to the former road, so it is possible that the PAHs detected may be associated with the asphalt road.	
29	Section 5.4.2		And then NFA for Metals?	E	Once the metals exceedance is removed, the site can be recommended for no further action.	
30	Table 4-5		3 rd column should be Tier 2.	C	Refer to response to Comment #21.	
31	Sec. 5.5.2		Is this asphalt?	E	PAH exceedances were found in Grids 1, 4, and 5. Perimeter Road	

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					runs through these grids; therefore it is possible that PAHs from the road may be affecting the site.	
32	Sec. 5.5.2		Close. What is the regional background level for arsenic? Tier 2 is 50 mg/kg.	E	The Texas specific background concentration for arsenic is 5.9 mg/kg.	
32	Sec. 5.5.2		Can we drop out Arsenic? Copper?	E	The concentrations of arsenic and copper detected exceed the Tier 1 PCLs. It was speculated during Partnering Meetings that offsite activities (camp fires) may be the cause of metals exceedances.	
33	Table 4-6		3 rd column should be Tier 2.	C	Refer to response to Comment #21.	
34	Sec. 5.6.2		Is this asphalt?	E	There are no roads that run through these grids so it is unlikely that the PAHs detected are related to roads.	
33	Table 4-7		3 rd column should be Tier 2.	C	Refer to response to Comment #21.	
34	Sec. 5.7.2		Is this asphalt?	E	There are no roads that run through these grids so it is unlikely that the PAHs detected are related to roads.	

1. C = concur, D = disagree, E = Exception

2. A = agree, D = disagree