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LETTER AND RESPONSE FROM TETRA TECH REGARDING U S NAVY COMMENTS TO
DRAFT INCINERATOR DISPOSAL SITE WORK, SAFETY AND MUNITIONS AND
EXPLOSIVES OF CONCERN WORK PLAN AT UXO 4 NAS CORPUS CHRISTI TX
01/02/2008
TETRA TECH NUS, INC.



TETRA TECH

January 2, 2008

Project Number 112G00356

Helen S. Lockard
NAVFAC SE (OPG6)
PO Box 30, Bldg 103
NAS Jacksonville
Jacksonville, FL 32212-0030

Reference: CLEAN Contract N62467-04-D-0055
Contract Task Order No. 0023

Subject: Transmittal of Response to Comments to Draft Incinerator Disposal Site
Work Plan, Health and Safety Plan and
Munitions and Explosives of Concern Work Plan
Naval Auxiliary Landing Field Cabaniss
Corpus Christi, Texas

Dear Ms. Lockard:

Enclosed please find one copy of Tetra Tech NUS, Inc (TtNUS) responses to Texas Commission on Environmental Quality (TCEQ) comments to the Draft Work Plan Documents (Work Plan, MEC Work Plan, Health and Safety Plan) for the Incinerator Disposal Site at Naval Auxiliary Landing Field (NALF) Cabaniss, Corpus Christi, Texas.

If you have any questions, please contact Kenneth Grim at (832) 251-6023.

Sincerely,

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

LB

Enclosure

c: Mr. C. Siegel, TCEQ, Austin, TX
Mr. M. Singletary, EPA, Dallas, TX
Mr. G. Leflore, NAS Corpus Christi, TX
Mr. H. Resides, NAS Corpus Christi, TX
Mr. M. Perry, TtNUS, Pittsburgh, PA
File 112G00356 (4.1)

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**Response to Comments on Draft Incinerator Disposal Site Work Plan Documents
NALF Cabaniss, Corpus Christi, Texas**

I. Reviewer: Chris Siegel, TCEQ

Comment #	Section/Page	Paragraph/Line	Comment	C,D,E ⁽¹⁾	Response	A or D ⁽²⁾
1	Work Plan Sect. 3.1.2		<p>It was stated in the last paragraph on page 3-2 that little is known about the operations of the sanitary landfill or the incinerator disposal site. It also states that aerial photography indicated that the site was disturbed as early as 1942 and that the area was identified as "sanitary fill". In Section 3.1.2, it then states that only areas near the boiler and perimeter road are suspect to contain MEC/MC due to the fact that visual inspection turned up some scrap. It would appear that historical land disturbance as well as the fact that little is known about the incinerator disposal site or sanitary landfill other than some conjecture would also make it suspect to further investigation. These areas should not be discounted or cleared for further use without a more detailed investigation. This comment may be addressed by future investigation(s).</p>	C	<p>The Initial Assessment Study of February 1984 identified IR Site 11, Cabaniss Sanitary Landfill, which was located near the south end of Runway 31 at NALF Cabaniss. The landfill covers approximately six acres and was primarily used for disposal of sanitary wastes generated at NALF Cabaniss. The landfill also received debris disposed of by the City of Corpus Christi resulting from Hurricane Celia.</p> <p>In addition to sanitary waste, the City of Corpus Christi and the Army used a portion of the site until approximately 1980 for incineration of confiscated drug material and burning small ordnance. A boiler, eight feet long by five-feet in diameter, was located at the site and modified to handle burning of 30 and 50 caliber ammunition, old flares, explosive cartridges from ejection seats and possibly 80 mm rockets. At some point during repair of the Patrol Road, the boiler was pushed over the bank toward Oso Creek. The site affected by incineration operations covered less than 200 square feet. Only small quantities of non-hazardous ash were generated from the boiler operations.</p> <p>Since no hazardous materials were reportedly disposed of at this site and only limited ordnance burning operations were conducted and little residual generated, no confirmation study was recommended for this site in the IAS. Due to the recommendations of the IAS, there is no remaining work planned for the landfill portion of this site. However, the work</p>	

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					programmed under the Munitions Response Program should cover the portion of the site where incineration activities occurred..	
2	Work Plan Sect. 6.3.1		Please provide a list that includes specific names of the explosives and metals to be sampled.	C	A Table listing the specific constituents (explosives, metals, PAHs) sampled for will be added to Section 6.0 of the Field Sampling Plan.	
3	Work Plan Sect. 6.3.5		Please be aware soil sampling may necessitate further groundwater study. This comment may be addressed in future investigation(s) once source areas have been identified and the MEC locations are better defined.	C	Noted. Additional investigations if required will be conducted during the RI phase of the project.	
4	Field Sampling Plan Sect. 4.2 and 4.3		These sections state that "samples will be analyzed for explosives, metals and perchlorate." These are families of chemicals and not the chemicals themselves. Please provide a more specific list that includes specific names of the explosives and metals that are to be sampled and analyzed.	C	A Table listing the specific constituents (explosives, metals, PAHs) sampled for will be added to Section 6.0 of the Field Sampling Plan.	
5	Field Sampling Plan Sect. 4.2		Surface water samples are only being collected from Oso Creek. However, in Section 5.3 (page 5-10), an exposure pathway via surface water could carry MC to the wetland areas as well as Oso Creek. The wetland areas are also considered ecologically sensitive. Please clarify the investigation in the wetland areas and justify whether surface water and or sediment sampling is needed in this area as well.	C	Sampling activities are not scheduled for wetland areas at this time. The results of the SI will be used to determine the need for additional investigations. Additional investigations if required will be conducted during the RI phase of the project.	
6	Field Sampling Plan Sect. 4.4		Soil sampling in this section does not cover the sanitary landfill area. This area will need to be investigated and would require a broader range of target chemicals of concern than just the MC constituents. This comment may be addressed by future investigation(s).	C	Refer to response to Comment No. 1.	

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7	Field Sampling Plan Sect. 4.5.2		It appears that subsurface soil samples are being collected for geotechnical analysis only (PH, fraction organic content and porosity). Since there is a justifiable risk that MC may have migrated into the subsurface, MC should be tested from subsurface soils. This comment may be addressed by future investigation(s) once source areas have been identified and the MEC locations are better defined.	C	Noted. Additional investigations if required will be conducted during the RI phase of the project.	
8	QAPP Sect. 6.0, Table 6.1 and Attachment A		Text states that analyses for explosives in soil, sediments, and surface water samples will be by Method 8330. The current Analytical Method is 8330B (October 2006). This method utilizes a different collection and preparation procedure which results in greater reproducibility.	E	Method 8330B is a new analytical method. As this is a new methodology many labs, including the navy certified lab selected for this project, have not yet conducted the necessary MDL testing or obtained Navy certification for use of this analytical method. The goal of the investigation is to determine the presence or absence of MC. This can be accomplished using Method 8330.	
9	QAPP Table 6.1		This table does not list the method for foc. Please be aware that the Walkley Black is the preferred method for foc if this method is applicable for the soil type. If another method is used, justification for this method will be required.	C	FOC will be analyzed using Walkley-Black.	

1. C = concur, D = disagree, E = Exception
2. A = agree, D = disagree

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II. Reviewer: Jim Pastorick, UXOPro

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1			General comment: The organization of the document is confusing. The overall work plan is tabbed "1". Then there are tabs for Attachment "A" followed by "1" and "2". Then there are appendices "B" and "C" (what happened to Appendix "A") followed by second tab "2" which is the MEC Work Plan. This tab "2" is the same as the previous tab "2" which is the Attachment A.2. to the FSP. This organization makes it difficult to find one's way through the document and to easily refer to specific locations in the document.	C	The Work Plan documents were incorporated into one volume for ease of handling during review process. For the final document, stand-alone copies of the WP, MEC WP, and HASP will be produced.	
2	Work Plan Sect. 3.1.3/ p. 3-7		This section says, "... it was concluded that no areas other than the boiler location, the ground surface just off Perimeter Road, and the land between these two locations were suspected to contain MEC." This is a premature conclusion since this work plan includes investigation procedures for the entire site, not just the area described in the quote. Several other locations in the document note that the past use of the site and the location of the landfill are not known. For example, see the statement on Page 5-3, Section 5.2.2 that, "... it is possible that residual ash, munitions scrap, or MEC are buried in the subsurface at the site". Another example is Section 1.3.6.2 of the MEC Work Plan which says, "Very little is known about the operation of the Incinerator Disposal Site, including period of operation, frequency of incineration of munitions items, potential for buried or abandoned munitions items, and whether any closure activities were performed." Therefore, it is premature to make such "conclusions" and it is recommended that this statement, and other similar statements, be revised to indicate that the results of the site investigation will be used to determine the areas of MEC contamination.	C	Section 3:0 is a background section that reiterates the findings and conclusions of the Preliminary Assessment. The SI will determine if additional MEC is present.	

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3	Work Plan Sect. 5.3/ p. 5-8		This section makes the statement, "... risk of MEC exposure to Navy personnel can be controlled by making personnel aware of the presence of MEC in the area." This determination appears to be beyond the scope of this work plan. What analysis was performed to determine that simply making Navy personnel aware of the presence of MEC in the area will control MEC exposure? Analysis of appropriate institutional controls will be appropriate following completion of the site characterization, not in the work plan. It is recommended that this statement be revised or removed.	C	The purpose of the Work Plan is not to make Navy personnel aware of MEC in the area. The statement reflects the Conceptual Site Model exposure pathway analysis as described in the Preliminary Assessment.	
4	Work Plan Sect. 5.4/ p. 5-11		This Summary section appears to contradict itself. First, it says, "... MEC and MC are suspected to be present at other locations within the site." Then, in the next sentence, it says, "The acreage of known MEC areas is approximately 0.4 acres, and the acreage suspected to contain MEC is approximately three acres." It is recommended, since it is established that MEC can be buried at unknown locations and that the site characterization covered under this work plan will investigate the entire site, it is not necessary to make premature conclusions concerning the boundary of contamination unless there is some substantial evidence indicating the location of the contamination boundary that is material to the performance of the site characterization work that is covered under this work plan.	C	The sentence identifies size of the area which is known to contain MEC and the size of the area that is suspected to contain MEC. This information is from the PA and may change as data is collected during the SI. The SI Report will summarize the known MEC areas and the suspect MEC areas for cost to complete estimating by the Navy. No change made to the MEC Work Plan.	
5	MEC Work Plan		General comment: Numerous locations throughout the MEC Work Plan refer to "Army" use of the site (see the bottom of Page 1-1 for examples). However, there is no evidence presented for use of the site by the Army. This may be a typo that needs to be corrected.	E	This statement came from the Initial Assessment Study. The text will not be revised.	

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6	MEC Work Plan Sect. 1.3.6.3/ p. 1-13		This section says, "... it was concluded that no areas other than the boiler location, the ground surface just off Perimeter Road, and the land between these two locations were suspected of containing MEC." See comment #2 above for a detailed description why this conclusion is not appropriate prior to performing the site characterization.	C	Refer to response to Comment No. 2.	
7	MEC Work Plan Table 1-1/ p. 1-19		This table lists several "State Threatened Texas" species. Does the fact that these species have been identified as possibly being on the site have implications for the use of the site? For example, should access to the site for management of state threatened species be added to the list of site uses and potential receptors in the conceptual site model in Section 5 and Figure 5-1 of the Work Plan? Should more information be added to Chapter 11 of the MEC Work Plan, the Environmental Protection Plan, to ensure that threatened species potentially existing on the site are not harmed?	C	The PA cited surveys that listed several species that may be present in the area. The surveys did not indicate occurrences of threatened or endangered species at NALF Cabaniss. No change made to the MEC Work Plan.	
8	MEC Work Plan Sect. 2.2.1/ p. 2-3		This section says, "If non-site personnel or non-essential non-UXO personnel enter the exclusion zone, all MEC operations will cease, until the exclusion zone is reestablished." This statement doesn't allow for "authorized visitors" to enter the exclusion zone. "Authorized visitors" are allowed in the EZ according to Section 14 of EP 385-1-95a "Basic Safety Concepts and Considerations for Munitions and Explosives of Concern (MEC) Response Action Operations", which says, "(c) Personnel not needed for the operation will be prohibited from visiting. (For <u>USACE MMRP projects, essential personnel and authorized visitors, as defined in this guidance, may visit the EZ while MEC procedures are being conducted.</u>)" [emphasis added]. Please revise this section to allow authorized visitors, including TCEQ regulators performing necessary project regulatory oversight, to enter the EZ in accordance with this guidance.	C	Section is changed to allow authorized visitors as determined by the Navy RPM and the Tetra Tech TOM with SUXOS recommendations.	

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9	MEC Work Plan Sect. 2.2.1/ p. 2-3		The section on Phase 1-1 says, "The UXO Team will establish the northern boundary of the area of concern as the center line of Perimeter Road along the northern and eastern edge of the former Incinerator Disposal Site," and that, "... the UXO Team will conduct a detector-aided surface sweep of the area south of the center line of Perimeter Road ...". Please explain why the surface clearance is only going up to the center line of Perimeter Road and does not include the entire width of the road. How will the extent of the surface clearance be marked to ensure that the boundary of the clearance (the center line of the road) is marked and enforced in the future?	C	The road has varying widths and is not clearly defined in some locations. The centerline is clearly defined as the area between the two tracks where the vehicles now travel. The objective is to find and remove surface MEC from the centerline to the tree line on the south of the road as a safety to personnel traveling the road. The boundary is already marked by the road and the tracks in the road. Decision made by representatives from Navy, State, and contractor during Kickoff/DQO meeting held last July. No change made to the MEC Work Plan.	
10	MEC Work Plan Sect. 2.2.2/ p. 2-4		Both the sections on Phase 1-2 and 1-3 describe the surface clearance as being done "along radials". Please explain what this means? How will the surface clearance be performed?	C	Radial transects from the boiler at the center of the AOC to the tree line. Second sentence in Phase 1-2 changed to read: Using the boiler as the center of the area of concern, the UXO Team will conduct a detector-aided surface sweep of the open area from the boiler to the tree line in all directions. Second sentence in Phase 1-3 changed to read: The UXO Team will conduct a detector-aided surface sweep of the open area from the center of the known MEC area near Perimeter Road to the tree line in the south, east, and west directions and to the center of Perimeter Road to the north direction.	

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11	MEC Work Plan Sect. 2.2.3/ p. 2-5		This section says that the detector-aided surface sweep will be conducted on, "5 – 10 feet (approximate) wide transect". This allows a variance of 100% in the amount of area investigated. It is recommended that the width of the search transects be specified based on the amount of area determined to be necessary for adequate investigation data to support future decision making. It would be beneficial to base the transect spacing and transect width on a data quality objective that needs to be met in order to achieve adequate data to support future decision making.	C	The 5-ft. wide (approximate) transect is based on the standard procedure used by the UXO technician during a transect survey. The data collected will aide in Navy cost to complete estimates. The decision to move to a RI/FS will be made using the fact that MEC is present on the surface at the site. Decision made by representatives from Navy, State, and contractor during Kickoff/DQO meeting held last July. No change made to the MEC Work Plan.	
12	MEC Work Plan Sect. 2.2.3/ p. 2-5		The first paragraph describes the data that will be collected during the detector-aided surface sweep. It is recommended that data on subsurface anomalies also be recorded. This data can help to find the locations for the follow-on geophysical surveys of likely MEC and burial areas.	C	The last three sentences refer to other information which will be collected. Other than the information recorded in the UXO Log book, other subsurface anomaly data will be collected during the geophysical survey as stated in Section 6. No change made to the MEC Work Plan.	
13	MEC Work Plan Sect. 2.2.5/ p. 2-7		This section contains the first mention of vegetation removal. This task should be described in more detail. How will vegetation be removed (with mowers, by hand, using chain saws and weed whackers)? Are precautions being taken to protect threatened plants and animals identified in previous sections of the work plan? Is vegetation removal also going to be performed for the detector-aided surface sweep (Section 2.2.3)?	C	While there is no organized vegetation removal planned, at the kickoff meeting, it was discussed that some removal may occur, if necessary, in order to walk the site with the geophysical equipment and to collect samples. The discussion included using hand removal or weed whackers but the removal would be done by the UXO technicians.	
14	MEC Work Plan Sect. 2.7/ p. 2-16		This section says, "The suspected type of ordnance contamination at the site is MEC reportedly consisting of 2.75 inch Rockets." However, numerous other types of ordnance are suspected to exist on the site. It is recommended that the list of MEC previously appearing in the document be referenced instead of only referring to 2.75-in. rockets.	C	Sentence changed to refer to Section 1.1.	

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15	MEC Work Plan Sect. 3.2.6/ p. 3-3		This section says that, "Proper authorities shall be notified in writing within 24 hours of the event." It is recommended that the work plan be modified to include a list of the proper authorities with their contact information and that the TCEQ Project Manager be included on this list.	C	Information will be added per ATF Regulation and TCEQ Project Manager will be added to the list.	
16	MEC Work Plan Sect. 3.2.7/ p. 3-3		This section says, "TINUS will use corporate designed forms and documents to comply with the requirements of this plan." Please specify which forms and documents are required to comply with the requirements of the plan.	C	Forms are located in Appendix G, Project Forms, of the Work Plan.	
17	MEC Work Plan Sect. 5.5/ p. 5-5		This section says, "Calibration, repair, or replacement records will be filed and maintained by the site Geophysicist and <u>may be subject to Audit</u> by the quality assurance (QA) manager. Data processing QC is required to assure data quality", [emphasis added]. Please add more information on QA and QC requirements by specifying whether or not the QA manager is required to conduct audits and what specific data processing QC is required to be performed, who will perform these QA and QC requirements and the frequency of these requirements.	C	<p>Section is changed to indicate that audits will be at the discretion of the Task Order Manager.</p> <p>Section is changed to provide detail regarding data processing QA - the field geophysicist (under the supervision of the project geophysicist) will manage, process, and interpret geophysical data from surveys. Standard data processing procedures, including standard corrections, will be followed correctly and tracked for QA. Fail criteria will be any data processed without following standard procedures or without generating QC tracking. QC tracking will be accomplished through daily QC reports, data processing logbooks, Geosoft Oasis Montaj Workflow and QC records, QC review by the Senior Geophysicist, and documentation on the data processing QC forms.</p> <p>The following forms are added to Appendix G, Project Forms, of the Work Plan:</p> <ul style="list-style-type: none"> • Field Editing Checklist • Data Processing Checklist • Data Storage and Transfer Checklist 	

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18	MEC Work Plan Sect. 5.6/ p. 5-5		Please specify who performs each of these required tests and how completion of the QC tests will be documented.	C	Section changed to indicate - The field geophysicist will ensure that all geophysical and associated navigational equipment checks are performed at the required frequency and meet acceptance criteria. QC Tests will be documented in the QC Logbook and on the daily equipment check form.	
19	MEC Work Plan Sect. 6.1/ p. 6-1		<p>This section contains two general statements on the geophysical program. But, these statements are not DQOs. The DQO process, as described in the EPA document, Guidance on Systematic Planning Using the Data Quality Objectives Process, (EPA QA/G-4), has not been adequately completed to determine how much investigation and how much data is necessary to support future decision making. How much of the site must be inspected during the detector-aided surface sweeps to locate possible subsurface MEC? Why are the 75-ft. transects adequate for this purpose? How wide will the investigated transects be and why? What navigation accuracy is required for the DGM surveys? What detection capability (size of MEC and depth) is required to locate the potential subsurface MEC at the site?</p> <p>All of these questions, and probably more, should be evaluated and the answers to these questions will form the basis for determining the DQOs that are required to be met to support future decision making at the site. Determining these DQOs now, and getting regulator concurrence, will help avoid questions in the future about the adequacy of the data.</p> <p>Note that Section 6.2 on Page 6-3 discusses navigation accuracy with a requirement for accuracy of +/- 2-ft. Is this a requirement that must be met in order for the data to be</p>	C	<p>The goal of the Site Inspection is to take the initial data from the Preliminary Assessment and expand on that data with field collected information.</p> <p>The data collected must be sufficient to support the decision to either continue with a remedial investigation and feasibility study or to remove the site from further investigation.</p> <p>MEC is visible on the surface at the site, therefore the site will continue in the CERCLA process to an RI/FS.</p> <p>The 75-ft. transects are used to establish a foot print of visible MEC of the surface and help the Navy with Cost to Complete estimates.</p> <p>The transects are approximately 5-ft. wide as this is the standard for the equipment used by the UXO technicians during the detector aided surface sweeps of the transects.</p> <p>Section 6.2 describes the accuracy for navigation during DGM surveys.</p> <p>There is little information about the site. The items identified in Section 6.1 is the initial MEC identified with the site and the Test Plot will be seeded as stated in Section 5.8 and</p>	

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			<p>adequate to support future decision making? If it is, then this is an example of a DQO that should be added to this section.</p> <p>Another example of the need for specific DQOs is in the detection depth requirement. The document notes in several places that the detection depth requirement is 1-ft. However, Section 1.3.7 on Page 1-154 notes that, "Potential burial depths of thermally treated munitions scrap could reach six feet below ground surface." Why is 1-ft. detection adequate when burial to 6-ft. is noted in the work plan? Establishing specific DQOs for the project that are available for discussion and concurrence by the regulators will help to prevent future misunderstandings on the adequacy of the investigation.</p>		<p>designed as stated in Section 5.3. This establishes the baseline of the equipment at 1-ft bgs. for the items in the Test Plot. In addition, the 1-ft detection objective is appropriate for the technology demonstration – show that the equipment is working correctly and gain information regarding target signature characteristics. This is not a Prove-Out.</p> <p>The Geophysical Technology Demonstration we have planned is similar to a Geophysical Prove-out except it has less requirements. It was determined during the DQO process that the requirements of the GPO were excessive and would add unnecessary cost to the project at this time. When the SI is complete, the information collected during the GTD, detector-aided surface sweep and follow-on geophysical surveys will be used during the design and performance of the GPO for the RI/FS.</p> <p>These DQOs were discussed during the Kick-Off Meeting at which both the TCEQ and contractor were present and had the opportunity to clarify DQOs at that time. The information collected during the SI will be used during the DQO process for the RI/FS and other future decision points by the Navy and regulators.</p>	
20	MEC Work Plan Sect. 6.1/ p. 6-1		The Time Critical Removal Action is referred to in this section as an Emergency Response which is not correct and should be corrected.	C	Changed "Emergency Response" to "Time Critical Removal Action".	

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21	MEC Work Plan Sect. 6.1/ p. 6-1		Again, there is reference to removal of vegetation with no information on how this will be done. Please add more information on vegetation removal to support the various phases of the project where vegetation removal will be performed.	C	Refer to response to Comment No. 13.	
22	MEC Work Plan Sect. 6.2/ p. 6-3		This section discusses daily QC tests. Please provide information on how these tests will be recorded and who will perform them.	C	Section changed to modify paragraph 3 of Section 6.2 – text added to include “QC procedures” in the list of items provided in Section 5.6. (See response to comment 18 regarding changes to Section 5.6).	
23	MEC Work Plan Sect. 6.3/ p. 6-4		This section describes a geophysicist checking all downloaded data for accuracy and completeness. How will this requirement be documented and how will it be verified for QC?	C	Section changed to indicate the geophysicist will check the data for the various parameters defined in the Field Editing Checklist (see Response to Comment 17), and the verification will be documented on this form.	
24	MEC Work Plan Sect. 6.5/ p. 6-4		This section includes a requirement to test the GPS daily before use. What specification will be met, how will it be tested and who will perform and document this test? How will performance of this requirement be documented?	C	Add the following sentence: See Section 6.2 for daily checks. The GPS information will be compared to the known location data and the results recorded in the geophysical log book. Section 5.6, paragraph 1 changed to indicate the tests and checks will be conducted by the Field Geophysicist. Section 5.6 is referenced in Section 6.2 for this information.	

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25	MEC Work Plan Sect. 6.6/ p. 6-4		<p>This section describes placing surrogates at varying depths up to 1-ft. in the survey area and says that this will be done, "... at the discretion of the SUXOS, UXOQC, and UXO Team Lead". This is describing what is sometimes called a "blind seed" program where test objects are placed in the production area to see if they are found. Not finding the "blind seeds" will be an indicator of inadequate survey procedures.</p> <p>It is recommended that this program either be eliminated or made mandatory. It is very unusual to allow this important QC function to be left entirely to the discretion of project technical personnel. It is recommended that the project managers determine if a "blind seed" program is required and, if so, describe in detail in the work plan who will implement it, how it will be implemented, and what action will be taken if blind seeds are not found during the production geophysical survey.</p>	C	Blind seeds will not be used and are not required for the geophysical survey operations. Retain first sentence and remove all additional information in Section 6.6.	
26	MEC Work Plan Sect. 10.3/ p. 10-3		This section references three QC reporting forms. Where can copies of these forms be found? It is recommended that these forms be added to the document.	C	<p>The following forms will be added to Appendix G, Project Forms, of the Work Plan:</p> <ul style="list-style-type: none"> • Daily Equipment Checklist • Quality Control Daily Report • Field Activity Daily Log (Log Book) 	
27	MEC Work Plan Sect. 10.3/ p. 10-3		This section describes four bulleted items that will be included on the QC Daily Reports. It is recommended that this report also include a listing of the QC inspections performed each day, the results of the QC inspections, and final QC inspections of completed work sites.	C	<p>The following bullet are added:</p> <ul style="list-style-type: none"> • QC inspections performed • Results of QC inspections with corrective actions • Results of final QC inspections of completed work sites with running total of completed work to date. 	

**Response to Comments on Draft Incinerator Disposal Site Work Plan Documents
NALF Cabaniss, Corpus Christi, Texas**

II. Reviewer: Jim Pastorick, UXOPro

Comment #	Section/Page	Paragraph/Line	Comment	C,D,E ⁽¹⁾	Response	A or D ⁽²⁾
28	MEC Work Plan Table 10-1/ p. 10-4		This table should include information for the following two activities: vegetation removal and geophysical survey.	C	While there is no organized vegetation removal planned, at the kickoff meeting, it was discussed that some removal may occur, if necessary, in order to walk the site with the geophysical equipment and to collect samples. The discussion included using hand removal or weed whackers but the removal would be done by the UXO technicians. The QC of the UXO support to the geophysical survey is covered under the UXO Escort/Avoidance Operations on page 10-4. Blocks added to Table 10-1 to provide information for geophysical surveys and data processing	
29	MEC Work Plan Table 10-1/ p. 10-4		This table should include the "quality control verification" procedure of "QC observe field procedures" for "limited surface clearance" and "UXO site inspection operation" activities.	C	QC Observe field procedures and limited surface clearance are covered under the Time Critical Removal Action Limited Surface Sweep at the top of page 10-4. UXO site inspection operation is at the bottom of page 10-4. No change made to the MEC Work Plan.	
30	MEC Work Plan Table 10-1/ p. 10-4		There should be some QC requirements added to the "MEC disposal" activity for transportation of explosives. Appropriate QC requirements include inspection of the transportation vehicle, establishment of a formal explosives transportation route, and inspection of the qualifications for the explosives vehicle driver.	C	Added three bullets to the Quality Control Verification column: <ul style="list-style-type: none"> • QC check on transportation vehicle inspection • QC observation of established formal explosive transportation route • QC check on qualifications of explosive vehicle driver 	

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Comment #	Section/Page	Paragraph/Line	Comment	C,D,E ⁽¹⁾	Response	A or D ⁽²⁾
31	MEC Work Plan Table 10-1/ p. 10-4		There is very little information on inspection, certification and disposal of MPPEH. It is recommended that the requirements of DoD Instruction 4140.62, "Management and Disposition of Material Potentially Presenting an Explosive Hazard (MPPEH)" (December 2004), for 100% inspection and 100% reinspection of MPPEH be implemented as a QC requirement.	C	Section 2.7.1 identifies MPPEH Management Operations. This table is used to identify the quality checks which will be conducted at each phase. DoD Instruction 4140.62 will be added to the list of references in Section 15.	
32	MEC Work Plan Sect. 10.4/ p. 10-5		This section on quality audits says, "Procedures for auditing activities will be identified prior to implementation of the audits." It is recommended that these procedures be identified and planned now and included in this work plan as part of the project planning process.	E	NOSSA conducts the audits on Navy projects. Their normal procedure is to send the contractor a notice which identifies the procedures to be used during the audit and when the audit will be conducted. Mr. Doug Murray from NOSSA did not feel that a QA audit was necessary for this phase of the project. It might be necessary for further investigation at the site and will be identified and planned for during future work plans. No change made to the MEC Work Plan.	
33	MEC Work Plan Sect. 11.0/ p. 11-1		This section on environmental protection says that, "TtNUS will avoid all environmentally sensitive areas, such as wetlands and breeding areas, where possible." Have these areas been identified? If not, when will they be identified, by whom, and using what criteria? What action must be taken if it is not possible to avoid these areas?	E	This MEC Work plan is for the Time Critical Removal of MEC on the surface and the Site Inspection of the Incinerator Disposal Site. As such, TtNUS will avoid environmentally sensitive areas. The last sentence in this section addresses the actions to be taken if it is not possible to avoid these areas. Environmentally sensitive and wetland areas were identified in the preliminary assessment based on past reports. No change made to the MEC Work Plan.	

1. C = concur, D = disagree, E = Exception
2. A = agree, D = disagree