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June 16, 2011

Mr. Tim Gordon
U.S. Environmental Protection Agency
290 Broadway- 22nd Floor
New York, NY 10007-1866

Subject: *Final Addendum No. 2 – Underwater Intrusive Investigation; Work Plan to Conduct Phase I RCRA Facility Investigation; Piñeros and Cabeza de Perro Islands, Naval Activity Puerto Rico (June 2011)*

Dear Mr. Gordon:

On behalf of NAVFAC and Navy BRAC PMO SE, we are pleased to submit the enclosed document, referenced above. This document incorporates USEPA and PREQB comments on the December 2010 draft version of this document. Responses to those comments are also enclosed.

If you have any questions regarding this work plan please contact Mr. Mark Davidson, BRAC PMO SE, at 843-743-2124 or at mark.e.davidson@navy.mil; or Mr. Stacin Martin, NAVFAC Atlantic, at 757-322-4780 or at stacin.martin@navy.mil.

Sincerely,

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A handwritten signature in black ink, appearing to read "Thomas M. Roth".

Thomas M. Roth
Principal Project Manager

cc: Mr. Mark Davidson, BRAC PMO SE
Mr. Stacin Martin, NAVFAC

Response to Comments

Draft Addendum No. 2 Underwater Intrusive Investigation Work Plan to Conduct Phase I RCRA Facility Investigation

Piñeros and Cabeza de Perro Islands, Naval Activity Puerto Rico (December 2010)

PREQB Comments (dated January 13, 2011, from Wilmarie Rivera):

Comment No. 1

Section 1.1 on Page 1-1 notes that UW-4 is not included in this investigation because the conditions in this area make it unlikely that there will be unauthorized recreational use of this site. Prior to PREQB concurrence with the exclusion of UW-4 from this investigation, PREQB requests the following information or clarification:

- a. Request that an underwater inspection of UW-4 be conducted similar to the inspections conducted at the other three sites.

RESPONSE: *The investigation of UW-4 is not feasible due to the technical difficulties associated with diving in the rough seas and strong currents that are expected at this location. Additionally, there is a low potential for human contact with MEC at this site, low likelihood of this site being used for recreational purposes, and lack of historical evidence that UW-4 was actually used for underwater demolitions. (See response to comment 1b below.)*

- b. Additional information is needed as to why recreational use is not likely at the site (e.g. scuba diving)

RESPONSE: *Inquiries about diving and boating in the vicinity of UW-4 were made with charter boat captains at Marina Del Rey and with avid divers in the area. This area is not amenable to boat anchoring and diving because of its unprotected location on the northeast side of the island. More favorable conditions for anchoring and diving exist on the south side of Piñeros Island. Furthermore, NOAA reports that there are strong tidal currents around Cabeza de Perro, further hindering boat anchoring and diving.*

- c. The goal for controlling the height of the sensor above the bottom during the previous DGM survey of the four underwater sites was 5-ft. to 10-ft. above the bottom (see Appendix A, Page 4). It is also stated at the bottom of Page 6 of Appendix A that the towfish was maintained at a height of 10-ft. above the bottom in UW-4. At this sensor height it is likely that small individual MEC were missed and the 32 anomalies (see Table 1-1 on page 1-5 of the work plan) identified in UW-4 are likely to be medium to large in size. This is an indication that significant underwater objects exist in UW-4 that need to be investigated.

RESPONSE: *The number and size of geophysical anomalies were not factors in determining areas for investigation. The investigation areas were selected on the basis of suspected historical use and the likelihood of human contact with any MEC that may be present. As stated above, the potential for human contact with MEC at UW-4 is very low. It is also unknown whether underwater demolition was actually conducted at UW-*

4. The only reference to the area now designated as UW-4 is in the 1992 Draft Environmental Assessment, in which it is noted that this is an area that the Navy and USFWS agreed could be used for underwater demolition training in 1987. However, there are no records showing that this area was used for underwater demolition.

- d. Section 1.3 on Page 1-3 provides the following justification for excluding UW-4:
- i. Deep water: According to Page 5 of Appendix A that water depth varies from 25-ft. to 35-ft. deep which is comparable to UW-1 (20 ft. to 25 ft.) and UW-3((15 ft.) which is well within the depth capabilities of any recreational or subsistence diver. Please clarify the apparent discrepancy.

RESPONSE: *The reference to deeper water at UW-4 was not intended to apply only to divers. At UW-1, UW-2, and UW-3, the listed depths are the maximum depths of the investigation areas. Because these investigation areas extend from the suspected demolition areas landward to the beaches, it is possible (and has been observed) that boats will anchor in these areas to allow their occupants to swim, snorkel, and access the beaches. At UW-4, there are no shallower areas, so (when considered with above site condition information) it is less likely that swimmers would use this area.*

- ii. Lack of adjacent beaches: this is not relevant criteria since any divers to the area of Piñeros and Cabeza de Perro will arrive at the site via boat from mainland Puerto Rico. This means that UW-4 is no less likely to be selected as a dive site than the other three underwater sites.

RESPONSE: *The lack of adjacent beaches is mentioned because it lessens the likelihood of boats anchoring and people swimming in this area. The presence or absence of beaches does not affect the likelihood of divers; however, as discussed under 1.b. above, other factors limit diving at or in the vicinity of UW-4, and this lack of diving has been confirmed through discussions with local boat captains and divers.*

- iii. Inaccessibility of Cabeza de Perro – As noted above, all visitors to any of the found underwater sites will arrive via boat. None of the four sites are less likely than others to receive visitors.

RESPONSE: *The inaccessibility of Cabeza de Perro is mentioned because it lessens the likelihood of boats anchoring in this area. As discussed under 1.b. above, other factors limit diving at or in the vicinity of UW-4, and this lack of diving has been confirmed through discussions with local boat captains and divers.*

In addition, the sidescan sonar survey of UW_4 detected the wreck of a large landing craft vessel just east of UW-4 (see Appendix A, Page 5). This makes UW-4 a desirable diving location because it has a large nearby wreck that attracts sea life and recreational users.

RESPONSE: *As discussed under 1.b. above, inquiries about diving and boating in the vicinity of UW-4 were made with charter boat captains at Marina Del Rey and with avid divers in the area, and they reported that they are not aware of sport dive operations at the site. The lack of diving at this wreck is expected to continue due to conditions mentioned above, including strong currents and rough waters due to the unprotected location northeast of the island.*

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- e. Figure 1-1 shows UW-4 to be very near the other three underwater sites and easily accessible by boat.

RESPONSE: *Although UW-4 is accessible by boat, it is unlikely that boats will anchor at this location, or that swimmers, divers, divers, or snorkelers will enter the water at UW-4, due to unfavorable conditions discussed above.*

- f. Figure 1-6 shows the anomalies at UW-4 to be clustered at an easily divable near-shore channel.

RESPONSE: *NOAA nautical charts reports strong currents along Cabeza de Perro Island, and rough waters were noted during previous field trips to UW-4. For these reasons, diving conditions are expected to be difficult for the intrusive investigation operations planned for the other underwater investigation areas. These operations require calms seas and no more than weak currents in order to safely and effectively conduct underwater intrusive operations.*

Comment No. 2

Section 2.2.3 on Page 2-3 says that MEC that is not safe to be moved will be covered by sandbags. This may be an appropriate procedure, but there is no explanation for why this is being done. Please explain the reason for this procedure.

Response: *After further consideration of the planned investigation procedures, sandbagging is no longer planned and references to this have been removed from the work plan.*

Comment No. 3

Section 3.3.4 on Page 3-4 says that the transect configuration is designed to achieve 10% coverage of the investigation area. Please clarify why 10% coverage is adequate to investigate these sites and why some targeted investigation of large anomalies or high density anomaly areas identified during the previous DGM survey isn't included.

Response: *A statistical approach for determining areal coverage of the site (and ensuring a specific degree of confidence that no MEC is located within the subsurface) cannot be appropriately applied to these suspected underwater demolition areas because the historical operations have no target; training activities may have occurred anywhere within the site boundaries. In the absence of a statistical approach, the industry-accepted practice for evaluating the presence or absence of MEC is to provide coverage over 5% to 10% of the area. As such transects over 10% of each area provide representative areal coverage of each site.*

Targeted investigation of anomalies identified during the previous DGM survey was evaluated but determined not to be feasible because anomaly sources may have shifted on the sea floor due to tidal movement and wave action. The ability to accurately locate all previously identified anomalies within the underwater areas is uncertain.

Comment No. 4

There is a minor typo in Section 3.4.5 on Page 3.6. It appears that the words "Data Reporting" at the end of the next-to-last paragraph are intended to be the heading for a new section.

Response: *The heading for “Data Reporting” has been corrected as suggested.*

Comment No. 5

Section 3.4.6. on Page 3-7 says that Table 3-2 shows that the TSD for unintentional detonations is 35-ft. However, Table 3-2 doesn't contain any reference to 35-ft. Perhaps the reference in Section 3.4.6 should be to the K40 distance in Table 3-1.

Response: *The value in the text has been corrected to 37 feet. On Table 3-1, the K-40 distance has also been corrected to 37 feet. The reference in Section 3.4.6 has been updated in the Final Work Plan to Table 3-3 (originally Table 3-2), Controlling Exclusion Zones.*

Comment No. 6

Table 4-1: Please clarify the purpose of the titled “2% of Total Area Surveyed”. Note that there is a requirement for reinspection of 10% of the transects later in this section. But no other reference to 2%.

Response: *This item, listed under equipment quality control, has been deleted.*

Comment No. 7

Section 4.4.2: Please provide guidance on how the 10% reinspection of the transects will be performed. How will the 10% be selected? Will the transect lines remain in place until the 10% reinspection is completed? If so, is there a time limit to conduct the 10% reinspection to ensure that the lines remain undisturbed?

Response: *The last paragraph in Section 4.4.1 has been revised to read “As a continuing part of the QC process, 10 percent of each transect will be re-inspected by the UXOQCS to confirm that the methodology is effective in recovering anomalies. The locations checked will be distributed in a randomly selected, spatially representative sample across each transect. If the re-inspected area fails QC, the transect will be reinvestigated. Transect lines will remain in place until the QC re-inspection is completed and approved by the UXOQCS. (It is anticipated that the transect lines will remain undisturbed for the duration of the investigation at each underwater area. If this is not the case, more frequent QC inspection may be performed.)”*

Comment No. 8

Section 4.4.2 lists numerous QC inspection forms, checklists, and tracking forms that will be used. Please provide the forms and the QC inspection procedures for review.

Response: *QC inspection forms, checklists, and other project forms will be included as Appendix D. Diving checklists are included in Appendix C, the Dive Operations Plan.*

Comment No. 9

Section 4.4.2: What is the “final acceptance audit”? Is this an “in-water” inspection of the area? Or is it documentation review? Please provide additional guidance on the “final acceptance audit”.

Response: The text has been revised to reflect that the Final Acceptance Inspection is a documentation review exercise. A checklist for the inspection is provided in Appendix D (form D-10) of the revised Work Plan.

Comment No. 10

Section 5 doesn't reference the Puerto Rico Explosives Law. The complete name of this law is: "TITLE 25. INTERNAL SECURITY, SUBTITLE 1. GENERALLY, PART V. REGULATION OF FIREARMS, EXPLOSIVES, AND OTHER DANGEROUS DEVICES CHAPTER 59, EXPLOSIVES ACT". Compliance with this law is required for all users or explosives in Puerto Rico and should be referenced in the work plan. PREQB can forward a copy of this document if that is requested.

Response: Reference to Puerto Rico's Explosives Act has been provided in the leading paragraph of Chapter 5, Explosives Management Plan. USA Environmental and the licensed blaster will comply with this law.

EPA Comments (dated April 29, 2011, submitted by TechLaw, Inc):

General Comment No. 1

The Work Plan is based on industry standards for munitions and explosives of concern (MEC) investigations on land. Since this work plan involves unexploded ordnance (UXO) divers performing intrusive investigations at three separate underwater sites, the practices used on land will not be effective underwater. The contractor will likely encounter many difficulties and require constant corrections relating to their Quality Control Deficiency Management Process and Lessons Learned found in Section 4, Quality Control Plan. Many types of diving gear and diving techniques affect underwater magnetometer use that will have a direct outcome in the anomaly sweeps as well as in the quality control inspections. The Work Plan is too vague with respect to how the underwater work will be performed and the diving practices that will be used. Revise the Work Plan to provide specific procedures for conducting the work under water. See the specific comments for examples.

Response: The ESS and Work Plan have been revised to reflect recent changes in NOSSA requirements for underwater intrusive operations. For underwater operations, Small Risk Injury Tables from Navy EODB 60A-1-1-37, Underwater Ordnance Operations and Procedures, have been used to establish exclusion zones in the Final Work Plan. The Dive Plan, which contains details of the dive practices, will be included as part of the Final Work Plan. Quality control concerns are addressed individually below. Additional detail has been added to the Work Plan regarding underwater work.

General Comment No. 2

The Work Plan states that the Department of Defense Explosives Safety Board's (DDESB) approval of the Explosive Safety Submission (ESS) is to be obtained prior to the start of fieldwork (it is noted that the ESS is not provided as part of the Work Plan). With this review, DDESB then has the opportunity to prescribe corrections to the plan as a stipulation for approval. The explosives safety exclusion zones and separation distances reflected in Work Plan appear to be based on land formulas where any explosive detonations would be

in the air. This is appropriate for the explosive disposal phase. It does not appear that appropriate consideration has been given to the potential for an unintentional detonation in the water. The diver's exposure to this risk is as valid as that of individuals on land and must be considered. The formulas used to establish the safety zones used in this plan are inappropriate for an explosive detonation in the water. The Work Plan should be revised to include safety zones appropriate for explosive detonation underwater.

Response: *The ESS has been revised to account for unintentional underwater detonation.*

In addition, NOSSA has stated that they will provide Service Approval on ESS's for underwater operations. As such the project team has worked closely with the NOSSA to establish underwater exclusion zones. The revised ESQD arcs are provided in Chapter 6 of the Work Plan.

Specific Comment No. 1

Section 1.5, Previous Investigations, page 1-4: This section details a list of confirmed and unconfirmed ordnance. The M72A2 Light Antitank Weapon (LAW) rocket has been selected as the Munition with the Greatest Fragmentation Distance (MGFD) in Table 3-1. Revise the Work Plan to explain the decision to use the M72 rocket as the Most Probable Munition for these underwater investigation areas over the other listed munitions.

Response: *The MGFD is the 66mm M72A2 (LAW) Rocket. This was selected based on the MGFD for the terrestrial portion of Piñeros Island. The ESQDs were based on the MFGD including the underwater exclusion zones. The underwater distances for personnel in the water were obtained using a table from a Navy publication EODB 60A-1-1-37, Underwater Ordnance Operations and Procedures and are in increments of 0 to 25lbs, 25 to 50 lbs etc. In the unlikely event that an item with a greater fragment distance than the 66 mm M72 (LAW) Rocket or an item with a NEW greater than 25 lbs is encountered, work will stop and the ESS and work plan will be amended.*

The final paragraph of Section 6.1 has been revised to read: "If, during the course of this project, a MEC item with a greater fragmentation range than the MGFD, or with a NEW greater than 25 lbs, is encountered, work will stop, the ESQD arcs will be adjusted, and the ESS (CH2M HILL, 2010d) will be amended."

Specific Comment No. 2

Section 3.3.1, Diving Operations, page 3-2: Appendix C "Project Dive Plan" was not provided for review. Revise the work plan to describe the type of diving gear that will be utilized and the dive equipment's potential effects on the Vallon MW 1630B all-metals detector.

Response: *Appendix C, the Dive Operations Plan, has been included as part of the Final Work Plan. SCUBA gear will be utilized for the underwater work. Section 3.3.1 has been amended to include the statement: "SCUBA gear utilized for the diving operations will not have any effect or interference on the all metals detector, as divers will be separated 5 feet from front to back and the head of the instrument is located approximately three feet from the SCUBA gear."*

Specific Comment No. 3

Section 3.3.4, Detect-and-Dig, page 3-4: This section is vague as to the actual process the diver will perform in his sweeps. Section 3.3.3 states "The diver will search 3 feet on each side of the jackstay line, establishing a 6-foot search lane." This appears to be a very wide

sweep for a diver and may not be possible with the Vallon instrument in a single sweep. Additionally, it is unclear as to how lane stops will be marked when divers require a break, or when there is a change in divers. Revise the Work Plan to describe how the anomalies will be marked if /when the diver must stop to investigate an anomaly or to request the Senior UXO Supervisor (SUXOS) to confirm the diver's analysis. Also, explain in detail the process by which the UXO Quality Control Specialist (UXOQCS) will confirm that all anomalies were detected.

Response: *This section has been revised to indicate that, "While maintaining neutral buoyancy and while swimming close to the bottom, divers will conduct the visual and subsurface investigation along the transect lines previously laid down. Divers will sweep their metal detector in front of them so that coverage extends three feet on either side of the transect centerline. Once an anomaly is identified, the diver will intrusively investigate the anomaly using the methods described in Section 3.3.5. At stopping points, the divers will tie flagging ribbon on the transect line prior to stopping or surfacing. The flagging ribbon will be removed prior to continuing the investigation."*

A three foot sweep is reasonable, since the coil of the all metals detector (now revised to the Whites Dual Pro PI system) is mounted on a three foot long handle. Six foot wide search lanes have been achieved in practice.

Anomalies will not be marked if the diver must stop to investigate it. Investigation using hand tools will commence immediately after discovery of an anomaly. In Section 3.3.5 text has been added to explain that the divers will be in direct communication with the dive support team through the use of Ocean Technologies Systems (OTS) through water communications gear. The dive team will identify an item through consultation with the SUXOS and UXOSO/UXOQCS. The UXOQCS (or equivalent) will provide the final classification as to whether MEC is acceptable to move.

Specific Comment No. 4

Section 3.3.5, Manual Excavation of Anomalies, page 3-5: This section appears to be written for land-based excavations. The statement is made that, "Using progressively smaller and more-delicate tools to carefully remove the sediments, the diver will expand the sidewall to expose the anomaly source for inspection and identification without moving or disturbing the item." It should be noted that sand and mud would not normally retain enough structure for this process. Revise this section to provide a more feasible process for anomaly investigation.

Also, the fourth bullet in the section states that, "Once the item is exposed for inspection, the excavation team will determine whether the item is MEC/MPPEH. The UXOSO/UXOQCS will provide the final classification as to whether MEC is acceptable to move." Revise the Work Plan to describe how this process is to be performed (i.e., will the dive stop and the supervisor dive down for verification? If the item is confirmed as MEC, will the dive team reduce to a single tended diver to reduce personal injury? What underwater separation distances will be instituted?). (Notes: MPPEH is material potentially presenting an explosive hazard. The UXOSO is the Unexploded Ordnance Safety Officer.)

Additionally the last paragraph states that, "The anomaly identifier and location will be recorded as having a source deeper than 1 foot beneath the seafloor that was not characterized or removed". Revise the Work Plan to describe how this information will be recorded (i.e., will the divers be collecting and writing information while diving or will the

information be passed to the dive boat each and every time an anomaly is encountered?). Also, explain how the QC diver will be advised of each of these locations.

Response: *The text has been revised to read “Using small tools to carefully remove the sediments from the side of the anomaly, the diver will expose the anomaly source for inspection and identification without moving or disturbing the item.*

Once the item is exposed for inspection, the excavation team will determine whether the item is MEC/MPPEH. Since the divers are UXO Technicians II/IIIs, they are able to make the determination that an item is safe to move. They will be in direct communication with the dive support team through the use of Ocean Technologies Systems (OTS) through water communications gear. If the dive team is unable to identify an item, the UXO QC Diver will dive to inspect the item .If the item is identified as MEC/MPPEH it will be identified by two divers. The UXOSO/UXOQCS (or equivalent) will provide the final classification as to whether MEC/MPPEH is safe to move.

Recording MEC/MPPEH: The diver will communicate to the MRSIMS operator in the dive support team via OTS through water communications the item size, type, hazards, depth, orientation, the approximate location along the transect (using the 10- and 50-ft marked transect lines), etc.”

For items deeper than 1 foot beneath the seafloor, the text has also be revised to include that a 3-inch diameter washer that has been spray painted orange and tied with flagging ribbon will be placed where an anomaly is detected deeper than 1 foot, and will be left at the location until the UXOQCS completes QC inspection.

Specific Comment No. 5

Section 3.4.5, Disposition of MEC and MPPEH, page 3-6: This section states that, “At least 24 inches of sandbags will be placed over the item. Two to six inches of space will be required between the MEC item and the sand bag enclosure.” This process appears to be written for land-based excavations vs. a shifting seafloor. Review this process and revise it as necessary to ensure that it can be successfully employed underwater before actual sweeps are performed.

Response: *Reference to sandbagging of underwater items has been deleted.*

Specific Comment No. 6

Section 3.4.6, Exclusion Zones and Separation Distance, page 3-7: The Team Separation Distance (TSD) for unintentional detonations is listed as 35 feet. Per Table 3-2 this distance is established based on “in air” calculations, (see General Comment #2) and is not appropriate for divers in the water. Review the team separation distances for divers and make the appropriate corrections.

Response: *The project team has worked closely with the NOSSA to establish underwater exclusion zones. Exclusion zones and team separation distances in Chapter 3 have been revised and the revised ESQD arcs are provided in Chapter 6 of the Work Plan.*

Specific Comment No. 7

Section 3.4.7, Anomaly Tracking using MRS Information Management System (MISAIMS), page 3-7: The Work Plan states: “Because of the physical restrictions of underwater investigation, the individual locations of anomalies will not be recorded. For

MEC/MPPEH items, a buoy will be placed at the item location.” Revise the Work Plan to describe how the QC diver is to evaluate his 10% check in that lane if the anomalies are not recorded and how will he know what anomalies have been investigated and which have not. Also, with respect to the data collected and tracked in MISAIMS, include a discussion of the process by which the divers provide each anomaly’s orientation, type, and fuzing to the surface MRSIMS operator.

Response: All anomalies up to 1 foot in depth beneath the seafloor in the 6-foot wide transect lane (marked by the jackstay line down the center) will have been removed following a pass by the UXO divers. As stated in the response to EPA Specific Comment 6, a 3-inch diameter washer that has been spray painted orange and tied with flagging ribbon will be placed where an anomaly is detected deeper than 1 foot beneath the seafloor. During the QC Diver’s 10% reinspection, no anomalies except for those marked by washers should remain.

An explanation of diver communication with the MRSIMS operator (topside) has been added to Section 3.3.5.

Specific Comment No. 8

Section 3.5.1, Inspection and Segregation, page 3-9: Underwater segregation of MPPEH and non-MPPEH is described as swimming the items to an accumulation point located within that transect. The transects are shown in Figures 3-2 through 3-4 as being over 700 feet long. Revise the Work Plan to explain how one diver is to swim the item to an accumulation point without leaving his dive buddy. Also, if both divers move the item, revise the section to explain the process by which they will identify where the sweep paused when they return.

Response: The text has been revised to indicate that both divers will swim the item to the accumulation point together, after marking with flagging tape the location where the investigation stopped.

Specific Comment No. 9

Figures 3-2, 3-3 & 3-4, Planned Underwater Transects: These figures do not include a description of the methodology by which the transects are identified and include the spacing between transects at all three UW sites. Revise the figures to include this.

Response: The figures will be revised as recommended.

Specific Comment No. 10

Section 4.4.1, QC Procedures for the Vallon MW 1630B, page 4-3: This section notes that, “10% of the transects will be re-inspected by the UXOQCS to confirm that all anomalies were detected”. Revise the Work Plan to describe the actions that will be taken if the QC diver detects an anomaly (i.e., will the whole transect fail QC inspection? Will the QC diver investigate the anomaly or mark it (with a buoy) for the intrusive dive team? Will the QC transect dive be performed the same day as the transect sweep? Will the same jack line be used or lifted and reset later for the QC dive?).

Response: Transect QC procedures have been broken out into Section 4.4.2. Section 4.4.2 reads,

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1. **“10% Re-inspection of Transects:** As a continuing part of the QC process, 10 percent of each transect will be re-inspected by the QC diver (with oversight by the UXOQCS) to confirm that all anomalies were detected. The locations checked will be distributed in a randomly selected, spatially representative sample across each transect. Transect lines will remain in place until the QC re-inspection is completed and approved by the UXOQCS. (It is anticipated that the transect lines will remain undisturbed for the duration of the investigation at each underwater area. If this is not the case, more frequent QC inspection may be performed.) If anomalies one foot or less are identified in the re-inspected area, the transect will fail QC and will be re-investigated by the UXO divers, following root cause analysis.
 2. **QC Seeding:** the UXOQCS will place one seed item per transect per diver to ensure that all anomalies are identified. The seed item will be an ISO painted fluorescent orange (or equivalent). The seed item will be placed on the surface of the seafloor or no greater than one foot below the seafloor at a frequency of one seed item per transect per diver. UXO Divers will not be provided the location of the seed items. If the UXO Divers do not recover the seed item(s) for each transect, the transect will fail QC and will be re-investigated by the UXO divers, following root cause analysis.”

Specific Comment No. 11

Section 4.4.3, Audit Procedures, page 4-8: This section states that specific QC audit procedures are presented in Table 4-2, however Table 4-2 has not been provided. Revise the Work Plan include Table 4-2.

Response: Table 4-2 is provided in the Final Work Plan.

Specific Comment No. 12

Section 6.1, Munitions Response Site, page 6-1: The Work Plan states that “The TSD for unintentional detonations is 35 feet.” See specific comment #6 above.

Response: The project team has worked closely with the NOSSA to establish underwater exclusion zones. The revised ESQD arcs are provided in Chapter 6 of the Work Plan.

Minor Comment No. 1

Table 3-1, Exclusion Zone Parameters, page 3-7: The listed MGF “66-mm M7A2 (LAW) Rocket” conflicts with the M72A2 rocket listed in Section 1.5. Revise the Work Plan to correct the nomenclature to the proper ordnance item.

Response: Reference to the “M72A2” rocket in Section 1.5 has been revised to “M7A2”.