

N00174.AR.002020
NSWC INDIAN HEAD
5090.3a

MEMORANDUM REGARDING THE RESPONSES TO COMMENTS ON THE DRAFT
MUNITIONS AND EXPLOSIVES OF CONCERN QUALITY ASSURANCE PROJECT PLAN
FOR UNEXPLODED ORDNANCE 20 (UXO 20) SAFETY THERMAL TREATMENT POINT
REMEDIAL INVESTIGATION NSWC INDIAN HEAD MD

05/31/2016
CH2M HILL

Responses to Comments on Draft UXO 20 MEC QAPP

PREPARED FOR: Joe Rail/NAVFAC Washington Travis Wray/NSFIH
 Alex Scott/NAVFAC Washington Andrew Louder/NSFIH
 Robert Thompson/EPA Region III Curtis DeTore/MDE

PREPARED BY: CH2M

DATE: May 31, 2016

This memorandum provides responses to comments on the above referenced document. Comments are presented as received, followed by CH2M's responses shown in italics. Please review the responses to ensure they address your comments

Comments from Joe Rail (NAVFAC Washington) – Received on April 18, 2016

Mr. Rail had reviewed the pre-draft version and has no comments on the latest draft version dated February 2016.

Comments from Bill Lindsay (FEAD) – Received on April 26, 2016

Mr. Lindsay has no comments on the MEC QAPP.

Comments from Travis Wray (NSFIH) – Received on April 27, 2016

1. I didn't see any mention of utility location in Worksheet #14. If the intent is to use the results from the utility location conducted in 2013, then I would need to have the report from that effort when obtaining the dig permit for this project. If no utilities were located in 2013, then I would think we wouldn't need to do a utility location again in the same area. However, if some utilities were located, then we would need to locate those again.

Response: Though utilities were not identified during the fieldwork conducted in 2013, utility clearing will be performed as it has been 3 years since the last utility clearing. As a result, utility clearing has been added to the following worksheets: WS #5 (Project Organizational Chart), WS#12-2 (Definable Features of Work Auditing Procedure), WS#14 (Summary of Project Tasks), and WS#17 (Sampling Design and Rationale).

2. Page 50, Site Preparation and EZs, where is the marina and museum that is referred to in the beginning of the second paragraph. The Smallwood State Park marina and museum?

Response: It is the Smallwood State Park, which is not onsite, but on Stump Neck. The 2nd paragraph under "Site Preparation and EZs" has been deleted as it is not applicable to this site.

3. Page 51, Anomaly Removal Verification, there is mention that the hole will be left open until the UXOQCS can conduct the QC inspection. Is the QC done daily or weekly? Wondering how many holes will be left open and exposed and for how long?

Response: Each hole will be backfilled before the end of the workday. The UXOQCS will conduct the QC inspection simultaneously and no holes will be left open at the end of the workday. The word "demobilizing" at the end of the 3rd bullet under "Anomaly Removal Verification" has been replaced with "the end of the workday."

4. Page 56, Site Restoration, please add the seeding and stabilization requirements to this section if you haven't already.

Response: *The text under "Site Restoration" has been replaced with the following text:*

"All open excavations will be backfilled to grade at the end of each workday. In addition, the Navy has provided guidance on seeding of the mowed and un-mowed areas at the site. For the mowed areas, a temporary seed mix of annual rye grass mixed in with a permanent seed mix of Tall Fescue (75 percent), Canada Blue Grass (10 percent), Kentucky Blue Grass (10 percent), and Redtop (5 percent) at 150 lbs. per acre will be used. According to the Navy, the annual rye will germinate in a week and the permanent mix will germinate at about 4 to 6 weeks. For the un-mowed areas, the same annual rye grass mixed in with a permanent seed mix of switchgrass (85 percent), swamp milkweed (5 percent), ironweed (5 percent), and boneset (5 percent) at 150 lbs. per acre will be used. At the end of all excavation activities, hydro seeding of the seed mixes will be applied to the site before demobilizing from the site."

Comments from Robert Thompson (EPA) - Received on April 11, 2016

5. If significant excavation is going to occur (especially near the Potomac/surface water body) a soil and erosion management plan should be developed. Based on the description of intrusion activities, "The intrusive investigation of anomalies will be initiated by UXO technician IAW the ESS (CH2M HILL, 2015). Mechanical excavation with a backhoe, mini-excavator, or similar equipment will not occur within 12 inches of a target location." and the number of excavations, protection may be required.

Response: *A soil and erosion management plan is not required for this activity as each hole will be backfilled before moving to the next hole. There will be no open holes at the end of the workday and there will be no soil stockpile onsite. The site topography is flat and storm water BMPs will be used to prevent sediment mobilizing offsite.*

6. The draft Work Plan states that the area will undergo "vegetation reduction" before intrusive activities start. The area may be in the Chesapeake Bay Critical Area. Consultation with the Critical Area Commission may be required. This may require post excavation/study restoration requirements. See <http://dnr2.maryland.gov/criticalarea/pages/faqs.aspx#7>

Response: *As a federal entity, consultation with the Critical Area Commission is not required because the Navy does not have designated critical areas. The Navy does consult with MDE per the Memorandum of Understanding between the State of Maryland and the United States Department of Defense on the Coastal Zone Management Act (CZMA). However, CERCLA projects are exempt from meeting the substantive requirements of the CZMA.*

Comments from Curtis DeTore (MDE) – Received on May 31, 2016

Mr. DeTore has no comments on the MEC QAPP.