

**TECHNICAL REVIEW COMMENTS and RESPONSES**  
**Draft Final Work Plan**  
**2010 Powder House Assessment and Removal, Red Devil Mine**  
**September 2010**

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**Specific Comments:**

Item	Section/Page	Comment	Response
1.		DEC does not review the health and safety portions of work plans, however please be advised that if old explosives are present which may be shock sensitive due to age, leakage, and degeneration, removing the roof off the collapsed building may not be a safe course of action.	The text will be revised to indicate that some debris may need to be removed in order to allow the Senior Unexploded Ordnance Supervisor (SUXOS) access to the structure. Any debris that is removed prior to inspection for potential explosive hazards will be done remotely through the use of cables and pulleys with equipment and personnel at a safe distance. Only after inspection of the structure by the SUXOS will heavy equipment be utilized around the building. This process will be described in the text.
2.	Section 2.0	Where is the section for Task 1? Is this the removal of the building? Where is the proposed location for on-site disposal?	The process for removal of the building (Task 1) will be described in the text. The structural debris that is removed will be buried at a location near the former structure. The actual location of where the debris will be buried will be determined in the field. The chosen location will impose the least environmental impact to the area and will be GPS surveyed.

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3.	Section 2.1	Section 2.1 – Have you contacted any federal EOD units to alert them as to the possibility that you might find something? What is the timeframe in which they would be able to respond?	Federal EOD unit may not be able to support the project. We are currently assessing whether we can have Weston conduct the demolition of any explosives discovered. Weston has experienced UXO Technicians who perform this type of work all the time in the Lower 48. This will be revised in the text.
4.	Page 2-2	Page 2-2, paragraph 3: A PID is not an appropriate field-screening device for explosives. Please use an appropriate colorimetric EPA-approved field-screening method.	Our plan is to use the PID (in conjunction with analytical samples) to assess the potential for POL contamination and use analytical samples to characterize the site for explosives. Since the site is extremely small, we feel that screening for explosives will not be necessary since they will be limited to surface soil, but since POL constituents can migrate to the subsurface easily, screening for POL could be used to guide the subsurface sampling effort. This will be clarified in the text.
5.	Page 2-2	Page 2-2, paragraph 3: what is the rationale to suspect that petroleum is a contaminant of concern at the powder house?	While we have no information currently that suggests the potential for petroleum contamination, we have conservatively included sampling for POL in the event fuel was stored in the building. This will be clarified in the text.
6.	Page 2-2	Page 2-2, Soil Remediation (OPTIONAL): Please state that if impacts are identified, alternatives will be discussed over the winter and a cleanup implemented during summer 2011.	The following sentence will be added to the end of this paragraph: “If impacted soil is discovered during the 2010 assessment, alternatives will be discussed over the winter and a cleanup will be implemented during the summer of 2011.”
7.	Section 2.4	DEC recommends use of EPA Method 8330(b) which requires a multi-increment sampling approach instead of Method 8330. This needs to be included in the scope of work. <a href="https://www.denix.osd.mil/portal/page/portal/EDQW/Final%208330B%20Implementation%20Guide%20070708%5B1%5D.pdf">https://www.denix.osd.mil/portal/page/portal/EDQW/Final%208330B%20Implementation%20Guide%20070708%5B1%5D.pdf</a>	We will revise the analytical method to Method 8330B and we suggest that surface soil within the entire structure (we believe the structure to be approximately 20 feet by 30 feet in size) be considered one decision unit. For subsurface soil samples, only limited soil volumes will be available using a hand auger. We recommend collecting discrete samples for explosives from the subsurface, but requesting the lab conduct sub sampling required under 8330B.
8.	Section 2.4	What laboratory will be analyzing the samples?	The lab will be TestAmerica in Arvada, CO. This will be added to the text.

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9.	Section 3.1	Screening levels should be the default method 2 cleanup levels from 18 AAC 75.341, Tables B1 and B2 for both explosives and petroleum. If contaminants of concern are present at concentrations exceeding the default levels, an evaluation can be conducted to determine if the alternative cleanup levels approved for the AST area would be appropriate for this area. Include a list of all potential contaminants of concern and the respective cleanup level.	Screening criteria in Section 3.1 will be changed to ADEC Method Two soil cleanup levels. A table will be included with Method Two soil cleanup levels for all contaminants of potential concern.

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