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RESPONSE TO COMMENTS DRAFT WORK PLAN REMEDIAL ACTION SITE 12 NSWC
INDIAN HEAD MD

SHAW ENVIRONMENTAL, INC.

**Response to Comments
Draft Work Plan
Remedial Action
Site 12 – Town Gut Landfill
Indian Head, Maryland**

Indian Head Division – Naval Surface Warfare Center Comments

Comment 1: Page 3-1, Section 3.2.1, first paragraph, second sentence. Miss Utility has no jurisdiction at Indian Head Division, Naval Surface Warfare Center (IHDIV-NSWC). You will have to hire a utility locator to locate utilities. A dig permit, which includes a Geographic Information System (GIS) map of the area, must be obtained from the Public Works Department prior to digging. The GIS map contains locations of “known” utilities. If any utilities not shown on the GIS map and not traceable, i.e., non-metallic (PVC, concrete, vitrified clay), are hit during construction, the government will be responsible for repair or replacement of the damaged portion of that utility (Activity personnel will repair them at no cost to you). All other utility repairs (those that are on the GIS map and/or those that are traceable and should have been located prior to digging) will be the responsibility of the contractor.

Response: The text will be revised to indicate that Shaw Environmental, Inc. will perform utility searches by passive detection methods and obtain a Dig Permit and GIS map from the Public Works Department prior to ground disturbance.

Comment 2: Page 3-2, Section 3.2.4, third sentence. Per Jeff Bossart, our Natural Resources Manager, the beaver dam is located at the weir, i.e., the beaver is using the weir as part of his dam. However, there typically is build up of sticks and twigs inside the culvert pipe downgradient of the weir, so even if the sticks are removed from the weir, confined space entry is required to clear the culvert. The culvert pipe is about 100 feet long and 7 feet in diameter.

Opening the valve on the weir (if it can be opened) may not lower the water level enough to expose all of the solid waste along the shoreline. When the weir was installed, a hole was dug in front of the culvert and a 55-gallon drum was placed in the hole. Water was then pumped into the drum out to the Creek, bypassing the culvert. The weir, which is a 1/2" to 5/8" thick steel plate with a V-notch (about 18 inches wide opening and about 18 inches deep at the bottom of the V-notch, was welded into the culvert pipe and braced with 2 angle irons (also welded). The plate itself is about 26 inches wide at the top. Removing a portion of the weir will most likely not be an easy effort.

I should also mention that the valve is a butterfly valve, so items flowing downstream will get lodged in the valve, which will have to be cleaned regularly. Removing the valve may be an easier method the removing a portion of the weir, or the entire weir. After the project is over, replacing the valve with a different type valve would be helpful to us.

Response: *Initially, Shaw Environmental, Inc. will lower the water level in the pond using 5-inch or 6-inch trash pumps and pumping the water over the weir. The pond water will be lowered to an elevation slightly lower than the work elevation. A cutting torch will then be used (after a hot work permit is obtained) to remove the portion of the weir. While this work is being completed, the beaver dam will be removed and the culvert will be unblocked. After the remedial work is complete, a steel plate will be welded back onto the existing weir. If the Base would like to replace the existing valve, arrangements can be made while the weir is being repaired.*

Comment 3: **Page 3-8, Section 3.11.4 Final Survey. Would it be possible to get the topography survey information electronically, such as in an ASCII file? We can add this information to our GIS if we have it electronically.**

Response: *Electronic and hard copies of the as-built drawings will be provided to the Base with the Closeout Report. An ASCII file with survey data can also be included.*

Appendix A

Comment 4: **Page 1-1, Section 1.2. See comment 2.**

Response: *See response to Comment 2.*

Comment 5: **Page 1-2, Section 1.3. Two-way radios can only be used on approval from our Safety Department. You must supply power (wattage) and frequency information to the Safety Department to obtain approval. Please note that approval can take several days.**

Response: *Radio information, along with information from other transmitting devices, will be supplied to the Safety Department for approval prior to mobilization.*

Comment 6: **Page 2-1, Section 2.1, first paragraph. Correct me if I'm wrong, but doesn't this say that you will leave waste in the pond if the water cannot be lowered enough to expose all of the waste? I believe that the pond should be lowered by alternate means, if necessary, to ensure that all waste in the pond is removed. There is a finite end to the waste in the pond from the landfill and we should try to get it all out, if possible.**

Response: *The information in this paragraph was taken from the Sequence of Construction on Sheet C-3 of the Final Submission Remedial Action Design*

drawings. Item 11 states: "In the event that the pool elevation can not be lowered to expose the indicated waste limits, excavate to the edge of water removing large items of exposed waste and debris along the edges of the pond." Shaw Environmental, Inc. will employ the means described in Comment 2 to lower the water level to expose and excavate as much waste as possible.

Comment 7: Page 2-1, Section 2.2.1, first paragraph, last sentence. The decision to remove or not remove waste should not be left with the ROICC. If anything, the Indian Head Installation Restoration Team should make that decision. In fact, my opinion is that it should be removed.

Response: The text will be revised to indicate that the Indian Head Restoration Team can direct the removal of waste.

Comment 8: Page 2-2, Section 2.4, last paragraph on page. Just for your information, the maximum driving speed on-site is 25 mph. This limit is posted everywhere. There are a couple of areas where the speed limit is less than 25 mph (the limit's 15 mph in these areas), but your trucks should not be in those areas.

Response: A sentence stating that the trucks will obey posted speed limits and all other traffic signs will be added after the first sentence of the paragraph.

Appendix B

Comment 9: Page 2-1, Section 2.1. Please add an additional sentence to the end of the opening paragraph. The sentence should say: "For all spills, contact the Fire Protection Division on (301) 744-4333 immediately."

Response: The text will be changed accordingly.

Comment 10: Page 2-1, Section 2.2.1. Please change "Police" to "Security". Please change "local police" to "Security Department" and add the telephone number for security, (301) 744-4381 or (301) 744-4565, to the paragraph.

Response: The text will be changed accordingly.

Comment 11: Page 2-1, Section 2.2.2. Please add "on (301) 744-4333" to the end of the sentence.

Response: The text will be changed accordingly.

Comment 12: Page 2-2, Section 2.3.4, second sentence. Please add "notify the Fire Protection Division" between "...activate alarm systems," and " notify the ROICC,..."

Response: The text will be changed accordingly.

Comment 13: Page 5-1, Section 5.2, second paragraph. Please add "Fire Protection Division and the" between "The EC will contact the" and "Navy ROICC to inform..."

Response: The text will be changed accordingly.

Comment 14: Page 6-1, Section 6.3, last sentence. This sentence can be removed or changed. Since the base already stores petroleum in large quantities, we have an SPCC Plan and contractors are covered under this plan. There is no need to prepare a separate plan.

Response: The sentence will be removed as requested.

Comment 15: Page 7-2, Section 7.4.1, next to last sentence. Please change the sentence to read "The EC will notify the Fire Protection Division on (301) 744-4333 and the ROICC in the event of any spill of hazardous material or petroleum product." Spill reporting is not limited by size. For example, a drop of oil on the ground or in the water is reportable. The Fire Protection Division will contact the appropriate Activity personnel who will determine if the spill is reportable to an outside authority and report it, as necessary.

Response: The text will be changed accordingly.

Appendix C

Comment 16: Are there exhibits VII-1, IX-1, and X-1? If so, they are not mentioned in the text and are not in the Figures or Exhibits section.

Response: There are no exhibits VII-1, IX-1, and X-1. The exhibits are named based on the sections in which they are referred. Sections V, VII, IX, and X do not have exhibits.

Appendix D – Review of Chapter 9 only

General Comment #1: Please change "fire department" to "Fire Protection Division" throughout the document.

Response: The text will be changed accordingly.

Comment 17: Page 9-2, Section 9.1, first and second paragraph on page. The use of radios and cellular phones is prohibited in the Restricted Area. Two-way radios may be used with prior approval from the Safety Department. I'm not so sure about cell phone use.

Response: The text will be changed to indicate that all transmitting devices will be submitted for approved use.

Comment 18: Page 9-3, Table 9-1, first row. The items on the list should be Fire Protection Division, Ambulance, Fire, and Security. The telephone number for all of these should be (301) 744-4333.

Fifth row. ROICC should include Lt. Russ Hime/Cathy Gardner. The phone number should be (301) 744-4112. Also, Jorgensen is spelled incorrectly.

Response: The table will be changed accordingly.

Comment 19: Page 9-4, Section 9.3.2, first paragraph, third bullet. Please change this bullet to read only the following: "Notify the Fire Protection Division on (301) 744-4333". The Fire Protection Division is our first responder and On-Scene Operations Team (OSOT), which was formerly called the HAZMAT. They would be the first to assist if assistance is needed.

Response: The text will be changed accordingly.

Comment 20: Page 9-4, Section 9.3.2, second paragraph, first sentence. Please change "ROICC" to "Fire Protection Division". The second sentence should read: "The Fire Protection Division will make all notifications, as appropriate, to initiate an evacuation of the surrounding area."

Response: The text will be changed accordingly.

Comment 21: Page 9-6, Section 9.6.1, first line on page. Please add "and report the spill to the Fire Protection Division on (301) 744-4333 immediately:" after "...pertaining to the following".

Response: The text will be changed accordingly.

Comment 22: Page 9-6, Section 9.6.2, third paragraph, second sentence. The on-site Emergency Coordinator will inform the Fire Protection Division. The Fire Protection Division will make all further notifications, as required.

Response: The text will be changed accordingly.

Tetra Tech NUS, Inc. Comments

Comment 1: Page 3-1, Section 3.2.1. Miss Utility of Maryland does not cover IHDIV-NSWC.

Response: Miss Utility will be removed from the text. A Dig Permit, including a GIS Map, will be obtained from the Public Works Department prior to ground disturbance.

Comment 2: Page 3-1, Section 3.2.1. Amplify "...field inspection to verify the locations and depths of utilities will be conducted to prepare the site for construction operations. ..."

Drawing T-2 note 9 states "...The Contractor shall verify utility locations prior to the beginning of any site work using a minimum of two passive detection methods (e.g. electromagnetic induction, ground penetrating radar, magnetic locators, acoustic survey, etc.) subject to approval of the ROICC."

Response: The text will be revised to indicate that Shaw Environmental, Inc. will verify utility locations using a minimum of two passive detection methods, subject to the approval of the ROICC.

Comment 3: Page 3-2, Section 3.2.4. Cite specific method to lower pond water level.

TtNUS understands that the pond water level is controlled by a steel plate attached to the upstream end of the culvert located at the southern end of the southern pond. The steel plate is not adjustable. A method of lowering the pond water level was discussed during the remedial design. The method consisted of removing a portion of the steel plate to the desired elevation; after construction the steel plate would be replaced to provide the original pond elevation.

TtNUS judges that the beaver dam should be removed.

Response: See response to Indian Head Division Comment 2

Comment 4: Page 3-3, Section 3.3.1. Drawing C-3 Note 9 requires that any sediment removed from the erosion and sediment control devices during maintenance activities prior to completing placement of the first lift of the soil cover shall be stockpiled for off-site disposal.

Drawing C-3 sequence of construction item 13 requires that during regrading and prior to placing the first lift of select fill, any sediment removed from the erosion and sediment control devices will be placed beneath the soil cover.

Response: *The seventh sentence in this section will be revised to indicate that accumulated sediment removed prior to completing the first lift of the cover soil will be spread on the uncovered area. All sediment removed after the first lift of cover soil is placed will be stockpiled for off-site disposal.*

Comment 5: **Page 3-3, Section 3.3.2. Refer to comment 4.**

Response: *See response to Comment 4.*

Comment 6: **Identify Maryland equivalent to Virginia Department of Transportation (VDOT) #1 coarse aggregate.**

VDOT #1 coarse aggregate is the same as AASHTO #1 coarse aggregate. The Maryland State Highway Administration (MD SHA) standard specifications utilize the AASHTO coarse aggregate gradations by reference.

Response: *“AASHTO #1 coarse aggregate” will be added to the text.*

Comment 7: **Page 3-4, Section 3.3.5. Third sentence. Use of decontamination water for dust control absent chemical analytical data is judged inappropriate. Drawing C-3 note 8 states “...Decontamination water will be containerized prior to off-site disposal.”**

Response: *The decontamination water that is referred to in this section will consist of pond water that drains from the debris, sediment that drops off the debris or equipment during decontamination, and potable water that is used to supply the pressure washer. This combination of material and liquids is similar in nature to the sediment that will be removed from along the pond boundary and placed within the regraded existing soils. Since the material coming from the drying beds is allowed to infiltrate into the landfill, the decontamination water should be disposed of the same way until the off-site fill begins to be placed. This will reduce handling and disposal costs and will not inversely impact the present condition of the site.*

Comment 8: **Page 3-4, Section 3.3.6. The function of portable sediment tanks is as a flow-through device used to remove sediment and not to serve as a storage or collection device (other than storage of trapped sediment).**

Response: *The text will be modified to indicate that the portable sediment tanks will be used as necessary to drop out sediment during dewatering operations.*

Comment 9: **Page 3-4, Section 3.3.8. Erosion control matting should conform to the requirements of MDE SESC Section 22 and Specification Section 02951 paragraph 2.11.1. MD SHA CM Section 920 Type B soil stabilization matting (i.e. nondegradable soil stabilization matting) should satisfy these**

requirements as long as the selected soil stabilization matting can withstand velocities up to 6 fps.

Response: The text will be revised to indicate that ECM will be used that can withstand flow velocities up to 6 feet per second.

Comment 10: Note that chipped vegetation should not be used in the topsoil or select fill layers as a rapid influx of decaying vegetation in the soil will release a relatively large quantity of carbon into the soil and a relatively low quantity of nitrogen (i.e. cause a high C:N ratio). Microbial growth in response to the elevated carbon levels will rapidly deplete the available (fixed) nitrogen in the soil, causing a nitrogen shortage. The planted vegetation may therefore experience a nitrogen shortage and grow poorly. This effect may be offset by increased nitrogen fertilization, but similar effects with respect to micronutrients not included in complete fertilizers could still result. It is better to not incorporate large quantities of chipped vegetation into the soil of a restoration site if possible. The chipped vegetation may be used as mulch per page 3-7 of the Basis of Design and Specification Section 02315 paragraph 3.1.1. Mulch is laid on the soil surface but not incorporated. Thin layers of mulch around new plants can help shield them against competing grasses and weeds.

Response: The chipped vegetation will be used around the plants in the wetland restoration. Chipped vegetation in excess of what is needed around the wetland plants will be spread within the site under the cover.

Comment 11: Page 3-5, Section 3.7. Ninth sentence. Water from materials handling pad should infiltrate into the landfill. Water resulting from the materials handling pad should not be permitted to run-off into the ponds.

Response: Page 3-4, bullet 3 under "Remedy Modifications" of the Basis of Design Report states: "The excavated soil, sediment, and waste material that contains free liquids will be placed on a materials handling pad(s) located within the soil cover limits and allowed to dewater naturally (i.e., free liquids will be allowed to either run off to the ponds or infiltrate to the shallow water table)." During the site setup, Shaw Environmental, Inc. can provide a controlled drainage pathway to the pond from the pad if this is more desirable.

Comment 12: Page 3-6, Section 3.8.1. Delete reference to Proctor testing. The regraded cover soil and waste cannot be tested effectively due to material heterogeneity. Compaction performance criteria (i.e. equipment type and weight, coverage, lift thickness, etc) must be satisfied.

Response: The reference to Proctor Testing will be removed.

Comment 13: Page 3-6, Section 3.8.2.1. The top layer of the select fill should be scarified before placing the overlying topsoil layer.

Response: The select fill layer surface will be scarified with dozer cleats prior to the topsoil placement.

Comment 14: Page 3-7, Section 3.8.2.2. Revise topsoil organic content from 5.0 to 8.0 percent.

Response: The text will be revised accordingly.

Comment 15: Page 3-7, Section 3.10. Note that the location of new groundwater monitoring wells shown on Drawing C-7 have been revised with the publication of the Post-Closure Long-Term Monitoring Plan for Site 12. The revised groundwater monitoring well locations depicted in Long-Term Monitoring Plan are attached as page 11 for your reference (Figure 2-2).

Response: The text will be modified to refer to the Long-Term Monitoring Plan.

Comment 16: Page 3-7, Section 3.11. The site restoration plan does not include shrubs or trees.

Response: The text will be revised to indicate that wetland plants will be planted. Note that "Wetlands Restoration" on Page 3-6 of the Basis of Design Report states "Wetlands that are disturbed will be reestablished with wetland species of plants and shrubs..."

Comment 17: Appendix A - Excavation and Material Handling Plan
Page 1-1, Section 1.2. First Sentence. Refer to comment 3.

Response: See response under Indian Head Division Comment 2.

Comment 18: Appendix B - Environmental Protection/Pollution Prevention Plan
Revise title for TtNUS to "Tetra Tech NUS, Inc."

Response: The name will be corrected.

Comment 19: Appendix C - Quality Control Plan

Exhibit VIII-1, page 3 of 3.

Paragraph titled "Density Tests" (paragraph 3.8.1.2) of Specification Section 02742 "Pavement With a Bituminous Concrete Surface" should be revised to state the following "ASTM D 2922, as follows: one test per 100 square yards, with a minimum of three tests."

Paragraph titled “Density” (paragraph 3.8.2.2) of Specification Section 02742 “Pavement With a Bituminous Concrete Surface” should be revised to state the following “One field test for each 100 square yards of bituminous concrete binder course and wearing course, with a minimum of three tests each course, in accordance with ASTM D 2950. Thin layer nuclear density gauge readings shall be taken on a control strip to determine the number of coverages to obtain optimum density. Optimum density is defined with the average density does not change by more than 1.0 percent between successive coverages.”

Revise Testing Plan and Log items 02742.3.8.1.2 and 02742.3.8.2.2 accordingly.

Response: The ASTM number will be corrected in 3.8.1.2 and the nuclear density gauge readings will be added to 3.8.2.2.

Comment: Appendix D – Site Specific Health and Safety Plan

For the purposes of the Health and Safety Plan (H&S) review, the IT/OHM Draft Work Plan and H&S plan were evaluated for conformance to 29 CFR §1926.65, the OSHA “Hazardous Waste Operations and Emergency Response” standard for the Construction Industry. As such, this review focused on determining if the minimum-required elements for these types of documents (as specified in this regulatory reference) have been adequately addressed. It should be noted that the intent of this review was not to evaluate the adequacy of these documents to protect the safety or health of individuals who will participate in the planned activities. Instead, this was limited to only a review for regulatory adequacy.

Review criteria and comments are presented in two tables. Table 1 provides comments on the Draft Work Plan and Table 2 provides comments on the H&S Plan.

Response: A column containing Shaw Environmental, Inc.’s response has been added to each table.

TABLE 1
COMPLIANCE WITH OSHA 29 CFR 1926.65
IT/OHM DRAFT WORK PLAN

SITE 12 – TOWN GUT LANDFILL, IHDIV-NSWC

Primary Reference: 1926.65(b)(3) "Comprehensive work plan part of the site program."

Comment Number	IT/OHM Work Plan Reference	Regulatory Reference (29 CFR §1926.65)	Comment	Response
20.	Work Plan, Section 3.0, Description of Activities	(b)(3) "Comprehensive work plan part of the site program." The comprehensive work plan part of the program shall address the tasks and objectives of the site operations and the logistics and resources required to reach those tasks and objectives.	Adequate	Comment noted.
21.	Work Plan, Section 3.0, Description of Activities	(b)(3)(i) The comprehensive work plan shall address anticipated clean-up activities as well as normal operating procedures which need not repeat the employer's procedures available elsewhere.	Adequate. (Note: "normal operating procedures" as specified in this regulatory paragraph were not observed. It was assumed that these are addressed by IT/OHM "elsewhere".)	Comment noted.
22.	Work Plan, Sections 1.0 ("Introduction") and 3.0 ("Description of Activities")	(b)(3)(ii) The comprehensive work plan shall define work tasks and objectives and identify the methods for accomplishing those tasks and objectives.	Adequate	Comment noted.

Comment Number	IT/OHM Work Plan Reference	Regulatory Reference (29 CFR §1926.65)	Comment	Response
23.	Work Plan, Section 2.0, Organization of Project	(b)(3)(iii) The comprehensive work plan shall establish personnel requirements for implementing the plan.	Adequate	Comment noted.
24.	None	(b)(3)(iv) The comprehensive work plan shall provide for the implementation of the training required in paragraph (e) of this Section.	Not addressed in the Work Plan. However, based on the information on this subject found in the H&S Plan it was considered that this is most likely adequately addressed in the IT/OHM's corporate safety and health program.	Comment noted. The Site-Specific Health and Safety Plan (SSHASP) addresses Shaw Environmental, Inc.'s corporate safety and health program.
25.	None	(b)(3)(v) The comprehensive work plan shall provide for the implementation of the required informational programs required in paragraph (i) of this Section.	Not addressed in the Work Plan. However, based on the content of Section 10.0 of the H&S Plan, it is assumed that the intent of this regulatory paragraph would be adequately addressed in the site-specific training specified in that Section.	Comment noted. The SSHASP covers site training and informational programs.
26.	None	(b)(3)(vi) The comprehensive work plan shall provide for the implementation of the medical surveillance program described in paragraph (f) of this Section.	Not addressed in the Work Plan. However, based on the information on this subject found in the H&S Plan it was considered that this is most likely adequately addressed in the IT/OHM's corporate safety and health program.	Comment noted. The medical surveillance program is addressed in the SSHASP and Shaw Environmental, Inc.'s corporate safety and health program.

TABLE 2
COMPLIANCE WITH OSHA 29 CFR 1926.65
IT/OHM DRAFT HEALTH AND SAFETY PLAN

SITE 12 – TOWN GUT LANDFILL, IHDIV-NSWC

Primary Reference: §1926.65 (b)(4)(ii) “Elements. The site safety and health plan, as a minimum, shall address the following:”

Comment Number	IT/OHM Work Plan/H&S Plan Reference	Regulatory Reference (29 CFR §1926.65)	Comment	Response
27.	Work Plan, Section 3.0 H&S Plan, Section 4.0, and Appendix D, Activity Hazard Analysis	(b)(4)(ii)(A) A safety and health risk or hazard analysis for each site task and operation found in the work plan.	Marginally adequate. There are four tasks mentioned in the Work Plan that are not addressed in the Activity Hazard Analyses in Appendix D of the H&S Plan. These included: <ul style="list-style-type: none"> ➤ Stabilize construction entrances (Work Plan Section 3.3.3) ➤ Installation of materials handling pads (Work Plan Section 3.3.4) ➤ Installation of decontamination pads (Work Plan Section 3.3.5) ➤ Installation of erosion control matting (Work Plan Section 3.3.7) 	AHA’s will be added for the four tasks not covered.
28.	H&S Plan Section 10.0, Training Requirements	(b)(4)(ii)(B) Employee training assignments to assure compliance with paragraph (e) of this section.	Adequate	Comment noted.

Comment Number	IT/OHM Work Plan/H&S Plan Reference	Regulatory Reference (29 CFR §1926.65)	Comment	Response
29.	H&S Plan Section 6.0, Protective Equipment, and Appendix D, Activity Hazard Analysis	(b)(4)(ii)(C) Personal protective equipment to be used by employees for each of the site tasks and operations being conducted as required by the personal protective equipment program in paragraph (g)(5) of this section.	Adequate	Comment noted.
30.	H&S Plan Section 11.0, Medical Surveillance Program	(b)(4)(ii)(D) Medical surveillance requirements in accordance with the program in paragraph (f) of this section.	Adequate	Comment noted.
31.	H&S Plan Section 8.0, Air monitoring	(b)(4)(ii)(E) Frequency and types of air monitoring, personnel monitoring, and environmental sampling techniques and instrumentation to be used, including methods of maintenance and calibration of monitoring and sampling equipment to be used.	Adequate	Comment noted.
32.	Work Plan, Figure 1-1, Site Location Map H&S Plan Sections 5.0. (Work and Support Areas) and 9.0 (Emergency Response)	(b)(4)(ii)(F) Site control measures in accordance with the site control program required in paragraph (d) of this section.	Adequate	Comment noted.

Comment Number	IT/OHM Work Plan/H&S Plan Reference	Regulatory Reference (29 CFR §1926.65)	Comment	Response
33.	H&S Plan Section 7.0, Decontamination Procedures	(b)(4)(ii)(G) Decontamination procedures in accordance with paragraph (k) of this section.	Adequate	Comment noted.
34.	H&S Plan Section 9.0, Emergency Response	(b)(4)(ii)(H) An emergency response plan meeting the requirements of paragraph (l) of this section for safe and effective responses to emergencies, including the necessary PPE and other equipment.	Adequate	Comment noted.
35.	Reference not found	(b)(4)(ii)(I) Confined space entry procedures.	Inadequate. If there are no confined space activities anticipated in this work (e.g., entering excavations, vessels, etc.), then at least a statement to this effect should be included so that this minimum required H&S Plan element would be satisfied.	Confined space entry will be addressed and added as an activity.
36.	H&S Plan Section 9.11, "Spill/Release Contingency Measures"	(b)(4)(ii)(J) A spill containment program meeting the requirements of paragraph (j) of this section.	Adequate – providing that the scope of services do not involve a potential for a "major spill" (as referenced in 29 CFR §1926.65 [j][1][viii]).	Indian Head has a SPCC that covers contractors.

Appendix E -Design Drawings and Specifications

Comment: No comments (the Drawings and Specifications were prepared by TtNUS).

Appendix F -Unexploded Ordnance Support Plan

Comment: The Unexploded Ordnance Support Work Plan will be provided under separate cover.

Appendix XX -Erosion and Sediment Control Plan

Comment: No comments (the Erosion and Sediment Control Plan Report was prepared by TtNUS).

Appendix XX -Stormwater Pollution Prevention Plan

Comment: No comments (the Stormwater Pollution Prevention Plan was prepared by TtNUS).

Appendix XX -Project Schedule

Comment 37: The project schedule indicates restoration from June 12 through June 19. The preferred seeding dates for temporary and permanent seeding are provided on Drawing C-4.

Response: The project schedule will be revised to reflect a mid- to late-summer mobilization and the preferred seeding dates will be considered during preparation of the final schedule.