Per the Federal Facility Agreement for Iowa Army Ammunition Plant, Article X.B.1, the attached document is the final version of the submitted document.
September 12, 2008

U.S. Army Corps of Engineers
CENWO-PM-HB, Mr. Terry Samson
1616 Capitol Avenue
Omaha, Nebraska  68102-1618

Subject:  Draft Final Geophysical Investigation Letter Work Plan Addendum
Military Munitions Response Program Remedial Investigation
Iowa Army Ammunition Plant, Middletown, Iowa
Contract W9128F-04-D-0001, Delivery Order 0055 and Modification No. 1

Dear Mr. Samson:

This Draft Final Geophysical Investigation Letter Work Plan (WP) Addendum was prepared by URS Group, Inc. (URS), in accordance with the performance work statement (PWS) for the United States (U.S.) Army Corps of Engineers (USACE) Omaha District contract W9128F-04-D-0001, Task Order 0055, Modification No. 1 to support the U.S. Active Army Military Munitions Response Program (MMRP) at Iowa Army Ammunition Plant (IAAAP), Middletown, Iowa. This Draft Final Geophysical Investigation Letter WP Addendum incorporates USACE, United States Army Environmental Command (USAEC), IAAAP, and United States Environmental Protection Agency (USEPA) comments on the Draft Geophysical Investigation Letter WP Addendum.

This Draft Final Geophysical Investigation Letter WP Addendum was prepared to detail modifications to the geophysical survey methodology and proposed survey areas listed in the Draft Final Remedial Investigation (RI) WP (URS 2008). Based on the results of the Geophysical Prove-Out (GPO) and Visual Survey completed at the Maneuver Area Munitions Response Site (MRS) (IAAAP-006-R-02), only minor modifications to the USEPA-approved Draft Final RI WP (URS 2008) were required.

This Draft Final Letter WP Addendum presents the results of the Visual Survey completed at the Maneuver Area MRS (IAAAP-006-R-02), details the minor modifications to the previous Draft Final RI WP (URS 2008), presents the increased geophysical survey area at the Incendiary Disposal Area MRS (IAAAP-006-R-01), and briefly describes the general field activities to be completed for the Geophysical Investigation phase of the RI.

Maneuver Area MRS Visual Survey Results

The Maneuver Area MRS (IAAAP-006-R-02) was not identified as an Active Army MMRP site in the Closed, Transferring, and Transferred Range/Site Inventory Report (e2M 2003). Based on the Historical Records Review (URS 2007a), the Maneuver Area MRS (IAAAP-006-R-02) is located along the east boundary of IAAAP within the East Training Range Munitions Response Area (MRA). The Iowa Army Reserve National Guard (IA ARNG) was authorized to perform training
exercises at the Maneuver Area MRS (IAAP-006-R-02) since at least 1969. Training exercises have, at a minimum, included dismounted movement, construction of bivouac sites, and night convoy operations. In addition, IA ARNG has historically been authorized to use ammunition blanks and pyrotechnics during training activities.

Dismounted troop training included navigation training, common task training, dismounted patrols and reconnaissance missions, and secure-and-defend missions in bivouac areas. It also included collective training for tasks such as emplacement and breaching of obstacles, inert minefield emplacement, inert demolition training, and simulated nuclear-biological-chemical training. Construction of bivouac sites at the Maneuver Area MRS (IAAP-006-R-02) included setting up field mess (kitchens), tactical operation centers, and sleep sites. Night convoy operations included personnel proficiency training with night vision devices, reconnaissance patrols, and perimeter security operations. IA ARNG units permitted to train at IAAP included the 224th Engineer Battalion, 185th Regional Training Institute, 19th Area Support Medical Battalion, 134th Medical Company, 109th Aviation Detachment, and 234th Signal Battalion.

On November 22, 2006, the Department of the Army Management Office - Training Simulations granted the Request for Reclassification of the East Training Range MRA (referred to as the Land Navigation Range in the Department of Army Memorandum), which includes the Maneuver Area MRS (IAAP-006-R-02) and Incendiary Disposal Area MRS (IAAP-006-R-01). This reclassification resulted in the East Training Range MRA’s status being changed from active to closed. In addition, the memorandum stated that the East Training Range MRA training areas (i.e., Maneuver Area MRS, IAAP-006-R-02) have not been used for live fire since September 28, 2001.

The Visual Survey of the Maneuver Area MRS (IAAP-006-R-02) began on June 17, 2008 and was completed on June 28, 2008. Two crews, each with an unexploded ordnance (UXO) specialist and a scientist, completed the Visual Survey (at an average of 100-foot transect line spacing) of the 508-acre area identified as the Maneuver Area MRS (IAAP-006-R-02). Approximately 56.5 linear miles were visually surveyed to identify any possible surface features associated with former training activities (i.e., berms and craters). All metals detectors (e.g., White’s XLT) were used to assist in the detection of metallic items that may have been munitions-related items or debris associated with former training activities (i.e., small arms and pyrotechnics) during the visual survey. No MEC nor munitions debris were observed on the surface of the Maneuver Area MRS (IAAP-006-R-02). However, munitions-related debris was visually observed both inside and outside of the previous boundaries of the Incendiary Disposal Area MRS (IAAP-006-R-01), which is located within the Maneuver Area MRS (IAAP-006-R-02).

Recommendations based on the visual survey results are as follows:

- The acreage of the Incendiary Disposal Area MRS (IAAP-006-R-01) will need to be increased 21 acres (from 12 acres to 33 acres) to include the area outside the existing boundary where munitions-related debris was visually observed. The acreage of the Maneuver Area MRS (IAAP-006-R-02) will need to be decreased by 21 acres (from 508 acres to 487 acres) to account for the acres transferred to the Incendiary Disposal Area MRS (IAAP-006-R-01).
• The geophysical survey area at the Incendiary Disposal Area MRS (IAAP-006-R-01) will be increased to include the additional acreage (21 acres) where munitions-related debris was identified.

• Since neither munitions-related surface features nor munitions debris were encountered in the remaining acreage for the Maneuver Area MRS (IAAP-006-R-02) (487 acres), no further geophysical investigation is required for this area.

• Include the two subsurface anomalies identified in Tract No. 153 on the target list developed for the intrusive investigation.

The June 2008 visual survey observations of the Maneuver Area MRS (IAAP-006-R-02) (Figure 1) and Incendiary Disposal Area MRS (IAAP-006-R-01) (Figure 2) are presented in Attachment A. Photographic documentation of the observations made during the visual survey is also presented in Attachment A.

**Planned Clearing and Grubbing Geophysical Investigation Activities**

UXO Technicians will conduct a surface sweep at each MRS prior to clearing and grubbing the vegetation. The surface sweep will be completed using hand-held equipment (i.e., all metals detectors) to ensure that MEC and munitions-related debris are not present at the surface of the MRS. Any identified MEC and munitions-related debris will be removed from the surface of the MRS and disposed of in accordance with the Draft Final RI WP (URS 2008).

After the surface sweeps have been completed and prior to the geophysical investigation, clearing and grubbing will be completed at the MRSs. Grass, tree, and shrub removal will be required to complete the geophysical surveys. Vegetation removed during the clearing and grubbing process will be chipped and left at each MRS location. A reasonable effort will be made to avoid cutting trees with a diameter of greater than 6 inches. Vegetation greater than 6 inches that is removed during the clearing and grubbing process will be replaced with native vegetation following the completion of the intrusive investigation field activities.

**Planned Geophysical Investigation Survey Activities**

Based on the results of the GPO, and in accordance with the Draft Final RI WP (URS 2008), an EM61-MK2A will be used to complete the geophysical surveys at each MRS. Based on the GPO results, the EM61-MK2A provides the best available technology for detecting buried metallic items (both ferrous and non-ferrous) that may be indicative of possible subsurface MEC items. The geophysical survey methodology will be the same as presented in the Draft Final RI WP (URS 2008). The resulting geophysical data will be used to identify potential MEC-related anomalies that may be intrusively investigated during the “dig and verify” phase of the RI field investigation.

In general, the geophysical surveys will be completed as complete grid surveys (100 percent coverage) using parallel survey lines spaced at 2.5 feet. The boundaries of the geophysical surveys...
are based on the MRS boundaries shown in the Draft Final RI WP (URS 2008), with the exception of the Incendiary Disposal Area MRS (IAAP-006-R-01). The planned threshold value for anomaly selection will be 5.5 milliVolts. The geophysical survey data will be used to evaluate the depth, distribution, and density of anomalies that may be indicative of MEC at each MRS. The MRSs and planned geophysical investigations are listed in the table below. The complete grid geophysical surveys that will be completed for each MRS are depicted on Figures 3-1 through 3-7 (presented in Attachment B) and are summarized on the following table.

### Summary of Planned Geophysical Investigations at the MRSs

<table>
<thead>
<tr>
<th>Munitions Response Site Name</th>
<th>Geophysical Survey Acreage</th>
<th>Threshold Value (milliVolts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Test Area (IAAP-001-R-01) (Figure 3-1)</td>
<td>15</td>
<td>5.5 mV</td>
</tr>
<tr>
<td>Line 6 Ammo Production (IAAP-002-R-01) (Figure 3-2)</td>
<td>0</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>West Burn Pads (IAAP-003-R-01) (Figure 3-3)</td>
<td>&lt;1</td>
<td>5.5 mV</td>
</tr>
<tr>
<td>Possible Demolition Site (IAAP-004-R-01) (Figure 3-4)</td>
<td>15</td>
<td>5.5 mV</td>
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<td>West Burn Pads Area South of the Road (IAAP-005-R-01) (Figure 3-5)</td>
<td>10.58</td>
<td>5.5 mV</td>
</tr>
<tr>
<td>Maneuver Area (IAAP-006-R-02) (Figure 3-6)</td>
<td>0</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Incendiary Disposal Area (IAAP-006-R-01) (Figure 3-7)</td>
<td>33</td>
<td>5.5 mV</td>
</tr>
</tbody>
</table>

Geophysical characterization has been completed over a significant portion of the Central Test Area MRS (IAAP-001-R-01) (Figure 3-1, Attachment B) and all of the Line 6 Ammo Production MRS (IAAP-002-R-01) (Figure 3-2, Attachment B) by MKM in 2005. Only 15 acres at the Central Test Area MRS (IAAP-006-R-01) that did not undergo geophysical survey in 2005 will be surveyed during this geophysical survey. No further geophysical characterization is required at Line 6 Ammo Production MRS (IAAP-002-R-01) or the Maneuver Area MRS (IAAP-006-R-02).

All work regarding the geophysical investigation during this phase of the RI will be conducted in accordance with this Letter WP Addendum, the Draft Final RI WP (URS 2008), and applicable USACE Data Item Descriptions.

### Planned Geophysical Investigation Schedule

The clearing and grubbing process is scheduled to begin on September 15, 2008 and will be completed in approximately three to four weeks. The geophysical mapping activities are
scheduled to begin on September 29, 2008 and be completed in approximately six to eight weeks (weather permitting).

Field personnel will mobilize to IAAAP in September to obtain security badges, camera passes, telephone passes, and to establish the temporary field office. Project Team Members associated with the geophysical investigation are identified in the Draft Final RI WP (URS 2008), Section 2, Table 2-1.

The enclosed copies (3 hard copies and 3 electronic copies) of the Draft Final Geophysical Investigation Letter WP Addendum are provided for your files and distribution.

Terry Thonen
Program Manager
URS Group, Inc.
(402) 952-2541

Jacquelyn Harrington, CHMM
Project Manager
URS Group, Inc.
(402) 952-2533

Attachments: Attachment A – Maneuver Area MRS and Incendiary Disposal Area MRS Visual Survey Results and Maneuver Area MRS Visual Survey Photographic Log
Attachment B – Revised Remedial Investigation Field Activities Figures (errata pages)

cc: Rodger Allison – IAAAP (10 hard copies, 5 electronic copies)
ATTACHMENT A

Figure 1 - Maneuver Area MRS Visual Survey Results
Figure 2 - Incendiary Disposal Area MRS Visual Survey Results
Maneuver Area MRS Visual Survey Photographic Log
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>June 2008</td>
<td>Transect 62, Sector 1, Barbwire</td>
</tr>
<tr>
<td>02</td>
<td>June 2008</td>
<td>Transect 76, Sector 2, Munitions Debris - Frag</td>
</tr>
</tbody>
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## MANEUVER AREA MRS VISUAL SURVEY PHOTOGRAPHIC LOG

<table>
<thead>
<tr>
<th>Photo No.</th>
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<th>Description</th>
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</thead>
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<tr>
<td>03</td>
<td>June 2008</td>
<td>Transect 56, Sector 1, Farm Implementation - sprocket</td>
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<td>04</td>
<td>June 2008</td>
<td>Transect 78, Sector 2, Munitions Debris - 75mm Pusher Plate</td>
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</table>
## MANEUVER AREA MRS VISUAL SURVEY PHOTOGRAPHIC LOG

**MMRP RI**  
Iowa Army Ammunition Plant, Iowa  

**USACE – Omaha District**  

**Contract No. W9128F-04-D-0001**  
Task Order 55, Modification 1

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<td>June 2008</td>
<td>Transect S2, Sector 2, Munitions Debris - Frag</td>
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<td>06</td>
<td>June 2008</td>
<td>Transect S8, Sector 2, Munitions Debris - Bottom of fuze</td>
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<td>Photo No.</td>
<td>Date</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
<td>------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>07</td>
<td>June 2008</td>
<td>Transect S8, Sector 2, Munitions Debris - Frag</td>
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<tr>
<td>08</td>
<td>June 2008</td>
<td>Transect S10, Sector 2, Munitions Debris - Frag</td>
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<td>Date:</td>
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<tr>
<td></td>
<td>June 2008</td>
<td>Transect S18, Sector 2, Munitions Debris - Frag</td>
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<td>June 2008</td>
<td>Transect 21, Sector 1, Barbwire Fence.</td>
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<td>Photo No.</td>
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<td>Description</td>
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<tr>
<td>11</td>
<td>June 2008</td>
<td>Transect 50, Sector 1, Barbwire</td>
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<td>12</td>
<td>June 2008</td>
<td>Transect 38, Sector 2, Brick Wall of Former Homestead</td>
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<td>Photo No.</td>
<td>Date</td>
<td>Description</td>
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<tr>
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<td>------------</td>
<td>------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>13</td>
<td>June 2008</td>
<td>Transect 38, Sector 2, Concrete slab near the Brick Wall of Former Homestead</td>
</tr>
<tr>
<td>14</td>
<td>June 2008</td>
<td>Transect 42, Sector 2, Hogwire</td>
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### MANEUVER AREA MRS VISUAL SURVEY PHOTOGRAPHIC LOG

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<td>15</td>
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<td>Transect 64, Sector 2, Aluminum Air Vent</td>
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<td>16</td>
<td>June 2008</td>
<td>Transect 75, Sector 2, Munitions Debris - Point Detonating Fuze</td>
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<td>Photo No.</td>
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<td>-----------</td>
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<tr>
<td>17</td>
<td>June 2008</td>
<td>Transect 85, Sector 2, Munitions Debris - Frag</td>
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<tr>
<td>18</td>
<td>June 2008</td>
<td>Transect 87, Sector 2, Hogwire Fence</td>
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<td>Description</td>
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<td>Photo No. 19</td>
<td>Date: June 2008</td>
<td>Transect 74, Sector 2, Munitions Debris - Point Detonating Fuze</td>
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<tr>
<td>Photo No. 20</td>
<td>Date: June 2008</td>
<td>Transect 74, Sector 2, Munitions Debris - Frag</td>
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<td>Photo No.</td>
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<tr>
<td>21</td>
<td>June 2008</td>
<td>Example of signage on K Road near the Incendiary Disposal Area IAAP-006-R-01</td>
</tr>
<tr>
<td>22</td>
<td>June 2008</td>
<td>Transect 73, Sector 2, Unexploded Ordnance Do Not Enter Sign</td>
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</tbody>
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ATTACHMENT B

Revised Remedial Investigation Field Activities Figures (errata pages)
FIGURE 3-1
CENTRAL TEST AREA MRS
(IAAP-001-R-01)
RI FIELD ACTIVITIES

* MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED
BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL
BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS.

Source: 1998 Aerial
Site Location

Legend

- LINE 6 AMMO PRODUCTION MRS SITE BOUNDARY
- RADIUS FOR EXPLOSIVE ITEMS RECOVERED AFTER EACH RESPECTIVE EXPLOSION (1968 AND 1970)
- CARETAKER STATUS
- POTENTIAL EXCLUSION ZONES (200 - FOOT MSD)
- HISTORICAL GEOPHYSICAL SURVEY AREA (MKM 2005)
- BUILDING BOUNDARY
- INSTALLATION BOUNDARY

Military Munitions Response Program Remedial Investigation

IOWA ARMY AMMUNITION PLANT
U.S. ARMY CORPS OF ENGINEERS
OMAHA DISTRICT
CONTRACT W9128F-04-D-0001

FIGURE 3-2
LINE 6 AMMO PRODUCTION MRS (IAAP-002-R-01)
RI FIELD ACTIVITIES

Source: 1998 Aerial

*MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS.

RI FIELD ACTIVITIES INCLUDE:
- DIG/VERIFY BURIED ANOMALIES (10%)
- MUNITIONS CONSTITUENTS SAMPLING

Source: 1998 Aerial
FIGURE 3-3

WEST BURN PADS MRS
(IAAP-003-R-01)

RI FIELD ACTIVITIES INCLUDE:
GEOPHYSICAL INVESTIGATION SURVEY
DIG/VERIFY BURIED ANOMALIES (10%)
MUNITIONS CONSTITUENT'S SAMPLING

*MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED
BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL
BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS.

Source: 1998 Aerial

Date: JULY 21, 2008

Military Munitions Response Program
Remedial Investigation
IOWA ARMY AMMUNITION PLANT
U.S. ARMY CORPS OF ENGINEERS
OMAHA DISTRICT
CONTRACT W912W6-04-D-0001

Legend
WEST BURN PADS AREA SOUTH OF
THE ROAD MRS BOUNDARY
WEST BURN PADS MRS SITE
BOUNDARY
CARETAKER STATUS
EXCAVATION BOUNDARY
OPERATIONAL AREA (NOT
ELIGIBLE FOR MMRP)
FORMER SITE FEATURES
POTENTIAL EXCLUSION ZONES
(1,040 - FOOT MSD)
PLANNED GEOPHYSICAL
SURVEY AREA
STREAM
INSTALLATION BOUNDARY
BG-X Burning Ground-(Building Number)
FIGURE 3-4
POSSIBLEDEMOLITION SITE MRS (IAAP-004-R-01)
RI FIELD ACTIVITIES

Source: 1998 Aerial

"MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS."
**Site Location**

**Legend**
- THE APPROXIMATE LOCATION OF AREA WITH NO VEGETATION AND REDISH-BROWN DISCOLORATION (750,000 PPM TNT)
- WEST BURN PADS AREA SOUTH OF THE ROAD MRS SITE BOUNDARY
- WEST BURN PADS MRS SITE BOUNDARY
- CARETAKER STATUS
- OPERATIONAL AREA (NOT ELIGIBLE FOR MMRP)
- FORMER SITE FEATURES
- POTENTIAL EXCLUSION ZONES (1,040 FOOT MSD)
- PLANNED GEOPHYSICAL SURVEY AREA
- INSTALLATION BOUNDARY

**Military Munitions Response Program Remedial Investigation**

IOWA ARMY AMMUNITION PLANT
U.S. ARMY CORPS OF ENGINEERS
OMAHA DISTRICT
CONTRACT W9128F-04-D-0001

**FIGURE 3-5**
WEST BURN PADS AREA SOUTH OF THE ROAD MRS (IAAP-005-R-01)
RI FIELD ACTIVITIES

**RI FIELD ACTIVITIES INCLUDE:**
- GEOPHYSICAL INVESTIGATION SURVEY
- DIG/VERIFY BURIED ANOMALIES (10%)
- MUNITIONS CONSTITUENTS SAMPLING

*MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS.*

**Source:** 1998 Aerial
*GEOPHYSICAL INVESTIGATION SURVEY AREAS WILL BE DETERMINED BASED ON THE RESULTS OF THE HANDHELD EM VISUAL SURVEY. MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS.

Source: 1998 Aerial
RI FIELD ACTIVITIES INCLUDE:
- GEOPHYSICAL INVESTIGATION SURVEY
- DISCOVER BURIED ANOMALIES (10%)
- MUNITIONS CONSTITUENTS SAMPLING

*MUNITIONS CONSTITUENTS SAMPLE LOCATIONS WILL BE DETERMINED
BASED ON RESULTS OF THE INTRUSIVE INVESTIGATION. SAMPLES WILL
BE COLLECTED AT LOCATIONS CONFIRMED AS HAVING MEC OR MUNITIONS DEBRIS.

Source: 1998 Aerial
RESPONSE TO USEPA AND US ARMY COMMENTS
URS RESPONSE TO USEPA AND US ARMY COMMENTS

DRAFT GEOPHYSICAL WORK PLAN ADDENDUM MILITARY MUNITIONS RESPONSE PROGRAM AT IOWA ARMY AMMUNITION PLANT

Comments by Scott Marquess, USEPA, Federal Facilities and Special Emphasis Branch, Superfund Division, August 25, 2008

GENERAL COMMENTS

Comment 1. The letter report should summarize the basis for including the Maneuver Area in the Remedial Investigation (RI).

Response: Agree. The letter report will be revised to summarize the basis for including the Maneuver Area in the Remedial Investigation.

Comment 2. Figure 1 shows two subsurface anomalies identified within the historic “contaminated area” at the Maneuver Area. Please describe these anomalies and how they were investigated. The identification of anomalies in the contaminated area suggests that a higher density survey of this area may be warranted and that it may be premature to dismiss this area from further investigation.

Response: Agree. During the Intrusive Investigation field activities, the two subsurface anomalies identified in the Tract No. 153 visual survey will be added to the target list for dig and verify. If MEC or munitions-related debris is identified, then munitions constituent sampling will be completed. If cultural debris is identified, munitions constituent sampling will not be completed.

Comment 3. The new boundary for the geophysical investigation of the Incendiary Area should be shown on Figure 2.

Response: Agree. The new proposed boundary of the Incendiary Disposal Area MRS will be included on Figures 1 and 2.

SPECIFIC COMMENTS

Comment 1. Page 1, paragraph 4 – Please clarify whether a metal detector was used to supplement all of the walk-over visual survey.

Response: Agree. The text will be revised to indicate that a handheld all metals detector (e.g., White’s XLT) was used to assist the visual survey.

Comment 2. Page 3, Table – You have concluded that no further geophysical assessment is required for Line 6, however, there has been no assessment of the previous work in this area presented to determine whether that work satisfied the data quality
objectives of the RI and is suitable for use in decision-making. Until such an assessment is completed to EPA’s satisfaction, the Army should plan to perform survey work at Line 6.

Response: Comment noted. See response provided for General Comment Number 1, GPO Technical Memorandum.

Comment 3. Page 3, last paragraph – The report indicates that clearing and grubbing of the investigatory areas will not begin until September 15, and will take three to four weeks to complete. EPA encourages the Army to begin such clearing and grubbing work as early as feasible to expedite the work schedule.

Response: Agree. URS will coordinate clearing and grubbing field activities immediately. No changes to the text are required.


Comment 1. Figure Why is the Contaminated Area in sector 1 (that has 2 subsurface anomalies) not included as part of the geophysical survey?

Response: Agree. Tract No. 153 is incorrectly labeled as a “contaminated area”. Figure 1 will be revised to change the color of the Tract No. 153 boundary outline.

Comment 2. The site (Maneuver Area) appears to be misidentified.

Response: Agree. Figure 1 will be revised to include the entire boundary of the Maneuver Area MRS.