

## North Lobe Dredging After Action Report Consolidated Response to Comments

There are two sets of comments and response to comments that built upon each other. The following is the key to the comment/response cycle.

USACE October 1, 2004 Comments

TTFWI Responses to USACE comments on October 1, 2004.

\* USACE Replies to TTFWI Responses on December 13, 2004.

- TTFWI responses to December 13, 2004 Comments.

1. Reference TTFWI's "Draft After Action Report for North Lobe Dredging" dated April 2004 (Trans. No. N1.02.06-02-001).

TtFW has updated the April 2004 draft North Lobe Dredging After Action Report incorporating the following USACE comments. The cost in Section 7 have been updated to reflect the costs in the updated cost report in Appendix F which included the final work performed at the DDA after the April 2004 draft was prepared.

2. I have reviewed the subject report and submit the following comments:

- Page iii, List of Tables: Change "Verification" to "Confirmatory".
  - o Changes made as indicated in the List of Tables and in other areas of the report as required.
  - \* Accepted
- Page iii, List of Appendices: After "Appendix C.5 Area D" insert "Appendix C.6 Plan View of All Areas" (as stamped & dated 1/03/04).
  - o Appendix C.6 was added as suggested. This is BCE Drawing 23468-02-01, dated 11/26/03. If USACE can supply a copy of the stamped and dated 1/03/04 drawing, then that version of the drawing will be included in the final report.
  - \* USACE will keep the original and supply a copy (attachment) to be inserted into the Report. Where is TTFWI's copy? TTFWI should have requested a copy prior to knowingly issuing an incomplete Report.
    - A copy of the drawing provided by the USACE has been included in the report.
- Page iii, List of Appendices, Appendix C: Before "As-Built Surveys" add "BCE's".
  - o Changes made as indicated. Also other references to Bourne Consulting

- Engineers (BCE) have been updated as required.
- \* Accepted.
  - Page iii, List of Appendices, Appendix E: Change “Water Quality Monitoring Data” to “ENSR’s Water Quality Monitoring Summary Report”.
    - o The title of Appendix E was changed. The USACE did provide a copy of the text for the ENSR report and has been included in the new draft for the NLD After Action Report. USACE did not provide any of the figures, tables or appendices to that report.
    - \* USACE will provide the copies (attachments). TTFWI should have requested the copies prior to knowingly issuing an incomplete Report.
      - *Copies of attachments provided by the USACE have been included in the report.*
  - Page iii, List of Appendices: Add “Appendix J Final Government Acceptance Inspections” (pre-final & final).
    - o This appendix was added to the List of Appendices. USACE did provide a copy of the final acceptance inspection dated December 15, 2003 and signed by the USACE on December 17, 2003, which is included in the updated NLD After Action Report.
    - \* The inspection form provided by USACE was actually a pre-final, since it contained items yet to be corrected. TTFWI should sign the pre-final inspection form and submit a signed final inspection form as well.
      - *G. Willant, TTFWI Project Manager signed the Pre-Final and Final Inspection form. Both are included in Appendix J.*
  - Page iii, List of Appendices: Add “Appendix K Photo Log”.
    - o This appendix was added to the List of Appendices. The appendix in the updated NLD After Action Report does include the six photographs which were taken for the NLD work.
    - \* There were more than six photos taken by TTFWI. USACE will forward these via E-mail.
      - *Copies of the photos provided by the USACE have been included in the report.*
  - Page iii, List of Appendices: Add “Appendix L Confirmatory Sampling Data”.
    - o This Appendix L was added to the List of Appendices. The Confirmatory Sampling Report was separate submittal made to the USACE, now included as an appendix to the NLD After Action Report.
    - \* Include a signed copy of the Eng. Form 4025 indicating that the Report has been approved. Figure B-1 of the Report is illegible and should be replaced.
      - *The signed Eng. Form 4025 has been included as well as a legible copy of Figure B-1.*

- Page iii, List of Appendices: Add “Debris Disposal Area As-Built”.
  - o This Appendix M was added to the List of Appendices. The as-built drawing for the as-built conditions as indicated by the USACE has been included for this appendix.
  - \* USACE provided TTFWI with a rough sketch indicating what information was missing from the original. It was not intended to be copied and used as the as-built. USACE requests that the actual survey data be utilized for the limits of steel debris placement and the elevation of the I-beam deadmen.
    - *The survey data can not be found. The drawing that was included with the draft report is all that is we have for the location of the deadmen and the steel debris. The following note will be added to the drawing, “Actual survey data is not available. Location of steel I beam deadmen and limits of steel debris placement are approximate.”*
  
- Page iii, List of Appendices, General: Use full-size drawings where applicable.
  - o Will do this where applicable and where full size drawings are available.
  - \* There are currently no full size drawings included. Appendices A, B & C.6 should be full size drawings.
    - *Full size drawings have been included in the report.*
  
- Page 1-1, Section 1.0, 2<sup>nd</sup> para., 2<sup>nd</sup> sent.: Change “Remediation” to “Remedial”.
  - o Changes made as indicated.
  - \* Accepted.
  
- Page 1-1, Section 1.0, 3<sup>rd</sup> para., 1<sup>st</sup> sent.: Add “of” between “removal” and “about”.
  - o Changes made as indicated.
  - \* Accepted.
  
- Page 1-1, Section 1.0, 3<sup>rd</sup> para., last sent.: Delete “is to be” and add “was”; delete “March 2004” and add “April 2004”.
  - o Changes made as indicated.
  - \* Accepted.
  
- Page 1-1, Section 1.0, last sent.: Change “latter” to “later”.
  - o Changes made as indicated.
  - \* Accepted
  
- Page 1-2, 1<sup>st</sup> para., 3<sup>rd</sup> sent.: Add “and water treatment” after “dewatering”.
  - o Changes made as indicated. Deletion of new water treatment plant at Area C was deleted after the Draft NLD AAR was written.
  - \* Accepted.
  
- Page 1-2, 2<sup>nd</sup> para.: Figures 1-2 and 1-3 are not included.

- These figures are in final report.
  - \* Accepted.
- Page 1-2, 2<sup>nd</sup> para., 4<sup>th</sup> sent.: Change “After Action” to “Remedial Action Completion Report”.
  - Changes made as indicated.
  - \* Accepted.
- Page 1-2, 2<sup>nd</sup> para., 5<sup>th</sup> sent.: Change “will be” to “is”.
  - Changes made as indicated. Packer is now in the process of constructing the new docking facilities at the North Lobe.
  - \* Accepted.
- Page 1-2, 2<sup>nd</sup> para., last sent.: Figure 1-4 is labeled “Sawyer Street Facilities” in the Table of Contents which does not seem to fit this text reference. It is also not included.
  - Figure 1-4 will be in final report. Text is added in Section 1.2 to provide explanation of the DDA and Cell No. 1 at Sawyer Street, and how these areas were used for processing/storing materials dredged from the North Lobe.
  - \* Accepted.
- Page 1-7, 1<sup>st</sup> sent.: Reference the report (with Trans. #) that contains the sediment characterization data for this area.
  - Did provide the document name, transmittal number and report date that provides the characterization sampling performed from August 2001 to May 2003.
  - \* Disagree. Transmittal number was not provided.
    - *Transmittal numbers have been included.*
- Page 1-7, 1<sup>st</sup> para.: Figures 1-5 and 1-6 are not included.
  - Figures 1-5 and 1-6 are included in the updated draft report.
  - \* Accepted.
- Page 1-7, last para., 1<sup>st</sup> sent.: Was “material characterization report” the official title? If so, capitalize it and include the Trans. #.
  - The official name was “North Lobe Dredging Area Characterization Report”, prepared by ENSR Corporation for the USACE, and was dated August 7, 2003. The USACE transmitted a copy of this report to TTFW on August 11, 2003. Name of report was corrected.
  - \* Accepted.
- Page 1-10, 2<sup>nd</sup> bullet: Delete “egg-shaped”.
  - Changes made as indicated.
  - \* Accepted.
- Page 1-10, Section 1.4, 1<sup>st</sup> sent.: Include the Trans. #s.

- Provided Transmittal numbers and dates that (1) the North Lobe Dredging Confirmation Sampling Plan and (2) Draft North Lobe Confirmatory Sample Results reports were transmitted to the USACE.
- \* Disagree. The Results Report was referenced as Appendix L; please provide a signed approval sheet. The Plan, however, was removed from the text without request; please reinsert and include transmittal number.
  - *A signed approval sheet has been included in Appendix L and the transmittal number has been included in the first sentence of Section 1.4.*
- Page 1-10, Section 1.4, 2<sup>nd</sup> para., last sent.: Change “Bourne” to “BCE”.
  - Changes made as indicated.
  - \* Accepted.
- Page 1-10, Section 1.4, 3<sup>rd</sup> para., last sent.: Change “testing” to “analysis”. Add the following sentence “All confirmatory sampling results are summarized in Appendix L.”.
  - Changes made as indicated.
  - \* Accepted.
- Page 1-11, Section 1.6, last sent.: “Axys” is not listed in “Abbreviations and Acronyms”.
  - “Axys” is the name of the company that tested the collected air samples for Kevric. TTFW to provide full name for “Axys”.
  - \* Accepted.
- Page 2-1, 1<sup>st</sup> sent.: Delete “of Wood Street Remediation work” and add “Lobe Environmental Dredging project”.
  - Corrections were made as indicated.
  - \* Accepted.
- Page 2-1, Table 2-1, Date 8/25/03: Change “Setup” to “Install”.
  - Changes made as indicated.
  - \* Accepted.
- Page 2-1, Table 2-1, Date 8/26/03 – 9/30/03: Change “Setting up” to “Install”.
  - Changes made as indicated.
  - \* Accepted.
- Page 2-1, Table 2-1: Change “March 2004” to “April 21, 2004”.
  - Changes made as indicated. It is noted that the Draft NLD AAR was written in March before the final grading of the DDA was performed.
  - \* Accepted.
- Page 3-1, Section 3.0: Include subsections describing the Performance Standards for

water quality criteria and [PCB] cleanup goal of 50 ppm.

- **Did add Sections 3.5 and 3.6 to address these two points.**
- \* **There are errors in Section 3.5. Change “200” to “300”; change “10” to “50”; and add “above background levels” at the end of the sentence.**
  - *Errors have been fixed and the sentence has been revised accordingly.*
  
- Section 4.0, General: Insert references to appropriate photos in the photo log throughout this section.
  - **There were only six pictures of the North Lobe Dredging Operations. Five photos were of dredging Area D and one was of the scow used to transport the dredged materials to the DDA. Reference to these photos was added to Section 4.5. There were no photos of the DDA operations.**
  - \* **Disagree. Additional photos taken by TTFWI will be E-mailed separately.**
    - *USACE provided photographs are included in Appendix K. Reference to photographs of DDA operations has been inserted in Section 4.8.*
  
- Page 4-1, Section 4.1: After Item #10 insert “Redredge Area C”.
  - **Changes made as indicated.**
  - \* **Accepted.**
  
- Page 4-1, Section 4.1: Add “15. Cut and spread debris at DDA.” and “16. Cap and grade DDA.”.
  - **These were added as points 16 and 17.**
  - \* **Accepted.**
  
- Page 4-1, Section 4.3, 2<sup>nd</sup> para.: After the last sentence, add “See Appendix E for ENSR’s Water Quality Monitoring Summary Report”.
  - **Changes made as indicated.**
  - \* **Accepted.**
  
- Page 4-2, Section 4.5, 1<sup>st</sup> sent.: Change “-mount 100,000” to “-mounted 100,000 pound”; after “3-CY” delete “hydraulic”.
  - **Changes made as indicated.**
  - \* **Accepted.**
  
- Page 4-2, Section 4.5, 4<sup>th</sup> para., 1<sup>st</sup> sent.: Delete “clam” and change “equipped with GPS” to “mounted with a GPS antenna”.
  - **Changes made as indicated.**
  - \* **Accepted.**
  
- Page 4-3, Section 4.5, last para., last sent.: Change “pending” to “before receiving”.
  - **Changes made as indicated.**

- \* Accepted.
- Page 4-3, Section 4.5: After the last sentence, add “This could be done for all the areas except the final area, which was the rededge of Area C.”.
  - o Changes made as indicated.
  - \* Accepted.
- Page 4-3, Section 4.6: After the last sentence, add “See Appendix E for ENSR’s Water Quality Monitoring Summary Report”.
  - o Changes made as indicated.
  - \* Accepted.
- Page 4-4, Section 4.8, 3<sup>rd</sup> para., 2<sup>nd</sup> sent.: Delete “add water to the”; and after “sediments” add “from the +2” material”.
  - o Wording was revised to reflect this suggested change.
  - \* Accepted.
- Page 4-4, Section 4.9, 1<sup>st</sup> sent.: Include the Trans. #s.
  - o TTFW to add transmittal numbers for the FSP and QAPP plans there used for North Lobe sampling and testing.
  - \* Disagree. Transmittal numbers have not been included.
    - *Transmittal numbers have been included.*
- Page 4-4, section 4.9.1, 1<sup>st</sup> sent.: Figure 4-1 is not included.
  - o Figure 4-1 is included in the updated draft report.
  - \* Accepted.
- Page 4-4, Section 4.9.1, 2<sup>nd</sup> para.: Delete the first sentence.
  - o Sentence was deleted.
  - \* Accepted.
- Page 4-4, Section 4.9.1: After the last sentence, add “See Appendix D for complete Air Sampling Data.”.
  - o Sentence was added.
  - \* Accepted.
- Page 4-6, Section 4.9.2: In the title, change “Confirmation” to “Confirmatory”.
  - o Changes made as indicated.
  - \* Accepted.
- Page 4-6, Section 4.9.2, 2<sup>nd</sup> sent.: Figure 4-2 is not included.
  - o Figure 4-2 was included in the updated draft report.
  - \* Accepted.

- Page 4-6, Section 4.9.2, last sent.: Include Trans #s. After the last sentence, add “See Appendix L for Confirmatory Sampling Results”. Include in Appendix L a plan view of the actual sample locations and sample profiles showing results at half-foot intervals.
  - o Added the transmittal number for the NBH FSP and QAPP plans.
  - \* Disagree. Transmittal numbers are not included.
    - *Transmittal numbers have been included in the text.*
  - o Sentence was added as suggested.
  - \* Accepted.
  - o Appendix L in the updated draft report does include a copy of the Confirmatory Results for the North Lobe. Plan of actual sample locations has been included, but there were no sample profile drawings generated.
  - \* Sample profiles were previously generated by TTFWI for the re-dredge of Area C only and are requested to depict actual sample results and document the condition that was evaluated by USEPA for acceptance.
    - *The USACE has provided a copy of the referenced sample profiles. The following changes have been made to include this graphical depiction in the report: In Section 4.9.2, the last sentence has been revised to say “See Appendix L.1 for North Lobe Dredging Confirmatory Sampling Results Report. See Appendix L.2 for a Graphical Depiction of Confirmatory Sampling Results.” In addition, Appendix has been revised to include two sections described above.*
  
- Page 5-1, last sent.: Include Trans #. After the last sentence, add “See Appendix J for Pre-Final and Final Government Acceptance Inspection Forms.”
  - o Did provide transmittal number for the North Lobe Dredging Confirmation Sample Results Report.
  - \* Disagree. In fact, the sentence referring to the Results Report was deleted. Please reinsert and include transmittal number.
    - *The deleted sentence has been reinserted.*
  - o Sentence was added as suggested.
  - \* Disagree. Sentence was added but revised from what was requested. The inspection form included in Appendix J is a pre-final, since it refers to items required to be complete prior to final acceptance.
    - *Sentence has been revised as requested and a Final Inspection Report has been included in Appendix J.*
  
- Page 7-1, Section 7.1, 1<sup>st</sup> sent.: The cost report predates the current version of the After Action Report. Update the cost report and include as Appendix F once this After Action Report has been finalized.
  - o Did provide the October 2004 updated cost report. The cost values in Section 7 were updated to reflect the final cost report. Final NLD After Action Report will be updated to reflect the final costs for the After Action Report.
  - \* Accepted.

- Page 7-2, last Activity: Change “Remedial” to “After” for consistency.
  - o This change was made, but the title in the cost report for Activity N1.21.06.91 will remain “Remedial Action Report”.
  - \* Accepted.
  
- Page 7-6, Section 7.4, 1<sup>st</sup> sent.: Change “I” to “H”.
  - o Changes made as indicated.
  - \* Accepted.
  
- Page 8-3, Section 8.5, 2<sup>nd</sup> sent.: After “entitled” add “to”.
  - o Changes made as indicated.
  - \* Accepted.
  
- Page 9-1, Section 9.0, USACE info: Include pertinent info for Maurice Beaudoin and Robert Simeone. Change Chris Turek’s phone number to “978-318-8234”.
  - o Information added as requested. TTFW to confirm addresses and phone numbers for Mo and Bob.
  - \* Please change Maurice Beaudoin’s phone number to 978-318-8223.
  - o Turek’s phone number was changed.
  - \* Accepted.

Additional USACE comments, as of 12/13/04.

- Page 4-3, 3<sup>rd</sup> para, last sent.: Change “loaded into” to “segregated and loaded into separate”.
  - *Sentence has been revised accordingly.*
  
- Page 7-2, Section 7.2.3: This is new text which unfairly puts all the blame of the cost overrun for this report on USACE & USEPA. Review comments that were generated were warranted due to the quality of the product. Unnecessary review cycles have also contributed. By TTFWI’s own admission, the original draft was issued prior to project completion and the subject revised draft was issued knowing that certain attachments were missing and could be supplied by USACE. TTFWI has also acknowledged difficulty recovering its own information. The text should be revised to reflect TTFWI’s ownership of the cost overrun.
  - *Section has been revised to read as follows: “This activity had a \$23,794 (111.10%) cost overrun from what was originally estimated due the report being more detailed in terms of sediment sampling mapping and data presentation than originally anticipated in the original cost estimate and due to additional review cycles because of missing or incomplete data in original drafts”.*

Note that the previous version of this report was submitted through the submittal process

(Trans. No. N1.02.06-02-001). The current version was not. Please assure that the next and hopefully final version is a “resubmittal”.

- *A new Eng. Form 4025 will provided as a resubmittal.*