EPA Comments – T4 Phase 1 Removal Action Final Design Analysis Report

Comment No.	Page No.	Section No.	Directed Comment (Yes/No)	Comment	Port Response
1.		General		The current schedule provided by the Port is dated 1/9/08. Please update the schedule as appropriate considering revised contracting methods and expected timeframes for the RA Work Plan, construction activities, etc. Please provide monthly schedule updates beginning 4/30/08 through the end of Phase I Removal Action construction.	The Port will update the schedule on a more regular basis as suggested.
2.	none	List of Acronyms and Abbreviations		For TEC, change "Total Effects Concentration" to "Threshold Effects Concentration."	The Port will make the suggested change.
3.	7	2.3		Item 1, first bullet. Please revise the text to state that the cap layer will be 6-inches minimum in thickness.	The Port will make the suggested changes.
4.	11	2.5.3		Saying "…and/or pesticides" is unnecessarily vague. Please revise to state specific results per the source control report.	This section will be revised to read: "As part of the RI/FS and Source Control Measure Voluntary Cleanup Program (VCP) Agreement between DEQ and the Port, five composite soil samples were collected from potentially erodible river bank soil along Wheeler Bay. Soil samples from all five composite areas contained concentrations of PAHs, cadmium, copper, selenium, zinc, and DDT above screening levels for human or ecological receptors (Source Control Alternative Evaluation, Terminal 4 Slip 1 Upland Facility Operable Unit 2. Ash Creek/Newfields, February 2007). Therefore, the river bank area was identified as requiring a source control measure. The Wheeler Bay shoreline will be graded to a more stable configuration and further stabilized with surface erosion control measures to isolate remaining contaminants."
5.	37	4.7		Additional fish protection measures may be identified pending further input from NOAA.	Noted.

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6.	49	5.2		Please add a reference to the *Source Control Alternative Evaluation, Terminal 4 Slip 1 Upland Facility, Operable Unit 2,* prepared by Ash Creek for the Port of Portland, February 2007. Please add a brief discussion of the alternatives evaluated and the conclusions reached. EPA is disappointed that the Port's response to EPA Comment 5 on the draft DAR was incomplete in regard to fully identifying relevant project issues.	The Port will make the suggested changes.
7.	50	5.2.1.1	Yes	Please revise the performance standards consistent with the conclusions of the source control report. Specifically, that contamination must be capped in place with a minimum of 12 inches of clean cover material. Please add that the cover over the contaminated soil is a "cap," and, therefore, both institutional controls and demarcation of the base of the cap with geotextile is needed.	The Port agrees with the 12 inches of minimum clean cover. The Port will propose to use a material type as demarcation of the cap area that will not produce a slip plane at the soil/material interface. The DAR text will be updated accordingly. As part of the upland property, this area will be under an institutional control.
8.	50	5.2.1.1		Fourth Bullet: Please clarify that contaminated material will be regraded and capped in place. This bullet implies that import material will be used for fill and grading for shoreline stabilization in Wheeler Bay. In contrast, the drawings and specifications instruct the contractor to backfill with common excavation (i.e., material excavated from the upper bank) to the extent possible.	This bullet will be revised to read: "Any import materials used for fill (topsoil, select fill, etc) shall meet defined chemical goals (presented in Table 5)."
9.	51	5.2.2		Second Bullet. Please clarify the rationale for not regrading the slope from STA 7+42 south to 3:1? Why is a 2:1 slope necessary? This needs to be justified, or changed to 3:1. Please coordinate this issue with NOAA regarding the biological opinion.	The presence of upland structures and pavements adjacent to the slope prevent cutting the slope back. Building the slope out into the water will cause loss of habitat and impact the existing outfall in the area. The slope shows no indications of instability. This additional justification will be added to the DAR.

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10.	56	6.1.1		Please clarify the language in this section. Will turbidity exceedences trigger a review of BMPs or merely require looking at TSS measurements? If the latter, an expedited turnaround time should be requested. The turbidity criteria were increased and the compliance boundary moved farther out so that turbidity criteria are reasonable to meet and in line with TSS concentrations of concern. The language here seems to suggest that turbidity exceedences will still not be enough to trigger any additional contingency actions. This is inconsistent with section 6.2 of Appendix B.	Turbidity exceedances at the compliance boundary will trigger contingency response actions. Additional text will be added to clarify this requirement in Section 6.1.1.
11.	56	6.1.1		If TSS is a component of the weight of evidence when evaluating the environmental significance of turbidity exceedances, please indicate the proposed construction water quality criterion or at least a "screening level" for TSS. If the background TSS in the Willamette River is to be the screening level, indicate so.	TSS is a component of the weight of evidence when evaluating the environmental significance of Turbidity exceedences as stated in this section. Background criteria, including TSS, are presented in Section 6.1.4 and presented in Table 7. No changes to the text or tables are proposed.
12.	58	6.2		Please reference the Supplemental Turbidity Analysis Memorandum (3/21/08) and more accurately summarize the rationale behind proposing 100 m from the mouth of Slip 3 for the turbidity compliance boundary.	The Port will reference the Supplemental Turbidity Analysis Memorandum (3/21/08) and more accurately summarize the rationale behind proposing 100 m from the mouth of Slip 3 for the turbidity compliance boundary.
13.	59	6.4		Provide a decision tree to show how water quality monitoring data would be used given potential outcomes (e.g., if turbidity exceeds 5 NTU or 10% of background 100 m from the mouth of the Slip during Slip 3 dredging, show on a decision tree what activities may occur and what would trigger them). The decision tree should incorporate some realistic contingency planning, particularly for the scenario where implementing BMPs does not reduce the point of compliance turbidity to below its compliance standard. This would also supplement Table 3 in Appendix B. The decision tree should identify the specific BMPs to be implemented during normal operations, and as contingency measures in event of water quality exceedances (chronic as indicator for additional BMPs and acute as "not to exceed").	The Port will provide additional text in Appendix B, Section 6 (Contingency Plan) and a related decision tree figure to show how water quality monitoring data would be used given potential outcomes, what activities would occur and what would trigger them, as suggested.

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14.	60	6.4.1		Include the DRET results for predicting TSS at the dredge, and indicate that these two lines of evidence (a model result and a laboratory bench scale simulation) were used to estimate a range of expected TSS concentrations at the point of dredging (approximately 200 to 800 mg/L). Linear interpolation of the EPA PLUMES modeling results indicates that the predicted turbidity 100 m from the dredge may exceed its project-specific construction water quality criteria whenever turbidity at the dredge exceeds approximately 30 NTU above background, or approximately 270 mg/L TSS, based on interpolating DRET results. While the DREDGE model indicates concentrations of suspended sediment drop off rapidly within 25 m from the dredge, the DRET and PLUMES data suggest an 83% drop within 100 m but only a total 88% drop within 200 m. This suggests an asymptote is being approached. If the TSS concentration or turbidity at the dredge is too high (e.g., greater than 270 mg/L or 30 NTU), the suspended sediment turbidity (or other parameters) may not drop off to below its compliance standard at the point of compliance.	The DRET results will be incorporated into the Phase I DAR by reference to the Supplemental Turbidity Analysis Memorandum. Additional text related to the Supplemental Turbidity Analysis will be included in Section 6 and Appendix B.
15.	64	7.3		In bullet 2, please add a description of the procedure for looking for injured, sick or dead listed species. Will the area downstream of dredging be investigated daily, during dredging activity, or at some other interval? A casual effort (e.g. if someone happens to notice a fish) is not sufficient.	The water quality monitoring team will look for injured, sick, or dead listed species during water quality monitoring activities, which will occur on a regular basis downstream and upstream of the construction activities. Monitoring activities will occur every 1 to 4 hours during construction activities.
16.	2	Table 5		Please change the Import Material Chemical Goal criteria for both TPH parameters to 50 mg/kg. This value is being set by EPA as reasonable, given that the proposed native quarry material should be reasonably expected to have no TPH contamination.	The Port would like to know what rationale was used to select 50 mg/kg for these criteria. Regardless, the Port will make the suggested revisions.
17.		Figure 5		Please clarify the location of the mesh lead panels vs. the harbor line. Does the panel end at the harbor line or turn and run along the harbor line? Please add appropriate line types to the legend.	The mesh lead panels extend to the harbor line and end at the harbor line. No panels will extend and run along the harbor line. The line type will be added to the legend.
18.		Table 10		Please note that NOAA has previously identified that mitigation may be required for the Wheeler Bay shoreline stabilization work. This issue remains to be resolved.	Comment noted.

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19.		Figure 11	Yes	Typical Section: Please revise the typical section to indicate placement of a demarcation fabric/barrier and 12 inches minimum of topsoil over regraded contaminated soils on the upper bank (elevation +20 to 30 ft). EPA does not concur that amending contaminated soils with compost and hydroseeding is adequate. Please clarify backfill requirements (select fill, common excavation) throughout the document based on other EPA comments on this issue.	Please see response to comment 5. The thickness of topsoil will be increased to 12 inches in the 20 to 30 foot elevation zone. Please see response to comment 46 for clarification of backfill requirements.
20.		Figure 11		Please include the detailed cross sections including typical plantings and armoring for Section F-F' for the 2:1 shoreline stabilization work. Presently this is only presented for the 3:1 work in Section E-E'. This comment applies to Section STA 8+20 on Sheet C-3 of the Wheeler Bay drawings as well.	There are no plantings in the section F-F' area due to the existing presence of riprap. The slope is currently armored with riprap.
21.	26	Appendix A, 5.2		Last sentence, please change "Construction drawings" to "Record drawings".	The Port will make the suggested revision.
22.		Appendix A, Figure 1		In the RA Work Plan, please update this Figure with the names of the persons holding these positions.	The Port will include this figure in the RAWP with the suggested update.
23.	B-12	Appendix B, 3.1.4		Clarify whether the clock for the first 4 hour monitoring period begins immediately upon the start of work on a particular day, or 1 hour after dredging begins. Also, recommend re-wording or revising the schedule to indicate during Tier I monitoring there will be a minimum of 1 conventional parameter measurement for each 4 hour period of activity. For example, if a work day had a total of 9 hours of dredging activity there would be three 4 hour periods, noting the last period is really only 1 hour in duration; measurements would be taken three different times, consistent with the number of 4 hour periods. This comment also applies to Appendix B sections 3.2.3, 3.3.3, 3.4.4, 3.5.4, and 3.6.5.	The text of Section 3.1.4 currently states, "…will be measured once every 4 hours (Tier I) at the start of dredging activities (i.e., beginning 1 hour after dredging begins) or if construction methods drastically change. The text of Sections 3.2.3, 3.3.3, 3.4.4, 3.5.4, and 3.6.5 will be clarified to state that there will be a minimum of 1 conventional parameter measurement for each 4 hour period of activity.
24.	B-20	Appendix B, 4.3		Clarify that the van Dorn will be decontaminated between sampling locations; as presently written it is not clear if any decontamination would occur between sample collection stations during a particular sampling event.	The Port will make it clear in the text that the van Dorn will be decontaminated between sampling locations.

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25.	8	Appendix B, 2.6.1		Please clarify the language in this section. Will turbidity exceedences trigger a review of BMPs or merely require looking at TSS measurements. If the latter, an expedited turnaround time should be requested. The turbidity criteria were increased and the compliance boundary moved farther out so that turbidity criteria are reasonable to meet and in line with TSS concentrations of concern. The language here seems to suggest that turbidity exceedences will still not be enough to trigger any additional contingency actions. This is inconsistent with section 6.2 of Appendix B.	Please see the response to Comment Number 11.
26.		Appendix B 5.2.1		Please add Item 3 from EPA Comment 49 on the draft DAR regarding notifying the Port about changes between preliminary and final results.	The Port will make the suggested revision.
27.	6	Appendix C, 4.2		Please revise the text to describe that slope stability and erosion will be assessed at all locations based on a visual survey, rather than only at transects.	The Port will make the suggested revision.
28.	7	Appendix C, 4.3		• Please separately discuss the two main vegetation zones: +15 to 20 ft elevation (trees) and +20 to 30 ft (grass). • Please add that grass coverage will be determined based on a visual assessment of area coverage rather than the proposed tape procedure. • Please indicate that the construction year is Year 1. • Please revise the Year 3 coverage goal to 50% for the tree zone and 80% for the grass zone. • Please add a Year 2 visual observation. • Please add that seasonally (at least twice per year), the Port will complete actions to remove non-native species, invasive species, and noxious weeds. • Please add that the Port will provide measures (string covers) as needed to prevent excessive vegetation destruction by geese.	• The Port will make the suggested revision • The Port will make the suggested revision • The Port will make the suggested revision • The Port will make the suggested revision • The Port will make the suggested revision. However, no formal reporting will occur in Year 2. • The Port will state that non-native species, invasive species, and noxious weeds will be removed twice a year during the 5 year monitoring period. • The Port will make the suggested revision.

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29.	8	Appendix C, 5		• Please add that vegetation observation will occur monthly during the first year. • Please add a reporting paragraph, including the following: Reports will be submitted to EPA yearly. Reports will consist of technical memorandum with color photos of a reasonable size to interpret the conditions, description of site conditions observed, data summaries, a statement of any deficiencies found, recommended corrective actions, and a schedule for implementing the corrective action.	• The Port will note that the observations will occur monthly during the first year, with reporting at the end of the first year. • The Port will make the suggested revision.
30.		Appendix C, Figure 1		Please increase the spacing between the survey locations in the Berth 411 area lengthwise (east-west) so that the east most survey locations lie in the middle of the sand "cap" area.	The Port will make the suggested revision.
31.		Appendix D Wheeler Bay Drawings C-1, C-4		Please clarify topsoil borrow area. Address EPA Comment 73 on the draft DAR regarding topsoil testing.	The topsoil borrow areas were incorrectly shown on the drawings. They have been deleted. Please see response to comment 48 regarding topsoil testing.
32.		Appendix D Dredge/Cap Drawing C-2		Please add the sand layer to Section 1.	The Port will make the suggested revision
33.		Appendix D Wheeler Bay Drawing C-3		• Typical Section: Please revise the typical section to indicate placement of a demarcation fabric/barrier and 12 inches minimum of topsoil over regraded contaminated soils on the upper bank (elevation +20 to 30 ft). EPA does not concur that amending contaminated soils with compost and hydroseeding is adequate. • Note that there is no Section 6 on Sheet L2, please add the section. Please clarify backfill requirements (select fill, common excavation) based on other EPA comments on this issue.	• Please see response to comment 9. • The Port will make the suggested revision. Please see response to comment 46 regarding clarification of backfill requirements.
34.		Appendix E1 12200		Please add the incentive language proposed by the Port in Marcel Hermans' email to EPA dated 3/27/08.	The incentive language is in the contract between the Port and the Contractor. The language is identical to Marcel Hermans' 3/27/08 email.
35.		Appendix E1 011100 1.3A2		Please change the document name to USEPA Water Quality Monitoring and Compliance Conditions Plan.	The Port will make the suggested revision.
36.		Appendix E1 0135929 1.2A		Please add: "The Port will provide a copy of its Health and Safety Plan to the contractor to aid the contractor in identifying important	The Port will make the suggested revision.

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37.		Appendix E1 0135929 3.3B7	Yes	Please add new Item 7: "Diver related heath and safety procedures, including dive plan preparation and submittal, safety protocols, PPE, decon, etc., consistent with EPA comments on Appendix J related to dive activities."	The Port will make the suggested revision.
38.		Appendix E1 015719 3.4A		Add "The Contractor shall comply with the Water Quality Monitoring and Compliance Conditions Plan."	The Port will make the suggested revision.
39.		Appendix E1 352023 2.1A		Please specify the net mesh opening size. This is an important detail to be worked out with NOAA, rather than left to the	The Port will make the suggested revision.
40.		Appendix E1 352025 2.5		Please address EPA Comment 72 on the draft DAR, regarding deletion of the word "granular" from the armor specification.	The Port will make the suggested revision
41.		Appendix E1 Table 1		Please change the Import Material Chemical Goal criteria for both TPH parameters to 50 mg/kg. This value is being set by EPA as reasonable, given that the proposed native quarry material should be reasonably expected to have no TPH contamination.	The Port would like to know what rationale was used to select 50 mg/kg for these criteria. Regardless, the Port will make the suggested revisions.
42.		Appendix E2 015719 3.4A		Add "The Contractor shall comply with the Water Quality Monitoring and Compliance Conditions Plan."	The Port will make the suggested revision.
43.		Appendix E2 312000 3.2C 329119 3.3B	Yes	As noted in *Source Control Alternative Evaluation, Terminal 4 Slip 1 Upland Facility, Operable Unit 2* document prepared by Ash Creek for the Port of Portland, February 2007, the bank is contaminated. Please revise the specifications to state that vegetation without adhering soil shall be sent for composting or disposed of at a Subtitle D landfill, and clearing and grubbing materials containing adhering soil shall be disposed of at a Subtitle D landfill.	The Port will make the suggested revision.
44.		Appendix E2 312000 3.3	Yes	Please revise to state that strippings shall be disposed of at a Subtitle D landfill.	The Port will make the suggested revision.
45.		Appendix E2 312000 3.6B		Please revise to "Shoreline grading shall be constructed from common excavation materials where shown on the drawings. Select fill shall be used for general backfill only under the select fill and topsoil layers shown on the drawings. Common excavation material shall not be placed in lieu of the specified select fill and topsoil layers. Excess common excavation shall be disposed of at a Subtitle D landfill."	The section will be rewritten as "Shoreline grading shall be constructed from common excavation only, unless insufficient common excavation is available. In the event insufficient common excavation is available to achieve subgrade, select fill may be used to achieve subgrade. Excess common excavation shall be disposed of in a Subtitle D landfill."

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46.		Appendix E2 312000 3.6I, 3.7 E, 3.8E 329119 3.4E 329113 3.1A, 3.1B, 3.2A, 3.3A		These sections appear to contain conflicting requirements for backfill placement, compaction subgrade scarification, and subgrade preparation. EPA previously provided Comment 74 on the draft DAR about this issue. EPA suggests the following: Compact common excavation used as embankment backfill to 92% of AASHTO T-180. Trim slope to grade and place demarcation fabric. Place select fill, armor, and topsoil per plan. When planting trees and shrubs, remove topsoil and cut an "X" in the demarcation fabric/barrier under each planting, and replace the topsoil. Please delete paragraphs 3.1A, 3.1B, 3.2A, and 3.3A. Paragraph 3.1A refers to placing 1 ft of sand over the subgrade, which is inconsistent with the drawings. Paragraph 3.1B, 3.2A, and 3.3A refer to tilling compost and topsoil into underlying contaminated soil, which EPA considers unacceptable.	The Port will make the suggested revision. Relevant parts of Section 329113 have been combined with 329119. Section 329113 has been deleted. The Port believes 85% compaction is suitable for slope stability and more appropriate for the given conditions. Please see response to comment 7 regarding the demarcation fabric.
47.		Appendix E2 Table 1		Please change the Import Material Chemical Goal criteria for both TPH parameters to 50 mg/kg. This value is being set by EPA as reasonable, given that the proposed native quarry material should be reasonably expected to have no TPH contamination.	The Port would like to know what rationale was used to select 50 mg/kg for these criteria. Regardless, the Port will make the suggested revisions.
48.		Appendix E2 329113 2.2A		Specify topsoil physical and chemical testing similar to other import materials (per Table 1 criteria). Clarify if on-site topsoil strippings will be used (and if so, indicate the CY available from on-site vs total CY needed). Address EPA Comment 73 on the draft DAR requesting testing of existing topsoils before reuse.	The Port will make the suggested revision.
49.		Appendix E2 329119 General		Earthwork requirements in this section (paragraphs 2.1A, 2.2, 3.3, 3.4) appear redundant with the previous section. EPA suggests deleting earthwork requirements in this section.	Please see response to comment 46 for revisions to earthwork specifications.

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50.		Appendix E2 329219 2.1B		Please revise to require that the seed mix contain 4 or more of the following *in roughly equal percentages.* Otherwise, the contractor could provide virtually all one type and minor amounts of 3 others.	The Port will modify the seed mix in the specifications as follows to reduce the potential for singular mixes: "Seed mix shall include the following species based on an application rate of 30 pounds per acre: -Bromus carinatus (California brome): 20% -Danthonia californica (California oatgrass): 5% -Elymus glaucus (blue wildrye): 20% -Festuca occidentalis (Western fescue): 20% -Lupinus rivularis (streambank lupine): 5% -Wheatgrass x wheat (Regreen, sterile wheat): 30%"
51.		Appendix F		Appendix F (Transportation and Disposal Plan) is little more than a shell at this point, with very few specifics as to where and how transportation and disposal will occur. Lacking these specifics, EPA may identify additional project BMPs and requirements after review of the RA Work Plan. EPA's expectation is that the Port will submit a detailed and complete RA Work Plan sufficiently in advance of the construction work to allow time for EPA review and comment that may result in substantive changes. The current schedule calls for the Port to submit a draft RAWP to EPA on 4/30/08, but it appears unlikely project transportation and disposal details will be known by this date. EPA anticipates that the Port will identify the transport and disposal method after contractor bidding. Please update the project schedule by April 30 indicating the anticipated schedule for submittal and finalization of the RAWP. EPA Comment 10 on the draft DAR identified that permits may be required for a sediment transloading facility. At this point, EPA believes there is unlikely to be sufficient time to obtain any permits, which narrows down the list of potential options.	Comment noted. Port will submit an updated schedule for submittal and finalization of the RAWP on 4/30/08.

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52.		Appendix H 3.3		Please revise the list of analytes for post dredging sampling to include a full suite of parameters, including metals, SVOC, pesticides, PCBs, and TOC.	Based on the April 24th meeting, the Port understands this is requested to evaluate post-dredge surface and baseline for phase II. The Port did not include PCBs and pesticides in the list of analytes for post dredging sampling because known concentrations of PCBs and pesticides in the Phase I dredging areas are either below the level of detection or have only been detected at very low concentrations within the proposed dredge area. Additional sediment sampling may occur as necessary to inform the design of Phase II.
53.		Appendix H 8		The text says that specific sampling and analysis procedures for water grab samples are contained in Appendix B. However, most of the information appears to be missing from Appendix B. Some of the information should be presented in the QAPP. Please review the status of the water quality sampling and analysis information and update the WQMP and QAPP so that all of the bulleted items are addressed. EPA Comment 96 on the draft DAR requested a schedule-based matrix, and the Port responded that it would provide a schedule-based matrix. EPA did not find a schedule-based matrix in the DAR. It appears that the paragraph at the end of Section 8 is intended to substitute for the schedule-based matrix. EPA does not find the paragraph to be responsive. Please provide a schedule-based matrix.	Most of the referenced sampling and analysis procedures are provided in Section 4 of the Appendix B WQMP. The remainder of the information (tables with specific methods, holding times, etc.) will be provided in the Appendix I QAPP. Schedule-based matrix: A schedule of the expected sampling and analysis dates will be prepared and submitted to EPA 2 weeks prior to in-water work beginning.
54.		Appendix H Table 1		Tables 1, 2, and 3 provide analytical methods, holding times, bottle types, etc. for sediment. Please add similar tables for water and soil to address needs for water quality monitoring and import material testing.	The Port assumes the USEPA meant to reference Appendix I (QAPP). The Port will make the suggested revision to Appendix I.

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55.		Appendix J General	Yes	Please review EPA Comments 97 through 109 on the draft DAR and make appropriate revisions and resubmit the HASP to EPA for review. EPA finds that only Comments 98 and 108 have been addressed to EPA's satisfaction.	The Port has reviewed the Comments and provides the additional responses: **Comment #97**: This change has already been addressed in Section 8.6 and Table 5 on page 53. **Comment #98**: This change has already been addressed on page 1. **Comment #99**: The requested change distinguishing commercial diving from scientific diving has already been made in Section 3.3.2, page 13. The requirement to provide a dive plan (s) and diver safety manual to EPA 2 weeks prior to any diver operations is stated in Section 3.2.2.1, page 13. Requirements for diving will be specifically discussed in the documents prepared by the diving subcontractor (dive plan (s) and diver safety plan). **Comment #100**: Section 3.3.2.5, Page 16 requires the dive subcontractor to coordinate with USCG prior to conducting any diver operations. More detail will be added to state that, in addition to notification, the contractor shall request a determination from USCG regarding the need for a notice to mariners and submit a dive plan per USGS upon request. **Comment #101**: The number of required divers will be made clearer in Section 3.3.2.9. **Comment #102**: See response to #103. **Comment #103**: A bullet will be added to Section 4.1 (General Diving Safety Requirements) to address minimum diver decon and equipment requirements. **Comment #104**: The fourth bullet in Section 3.3.2.9 (Emergency Procedures) requiring each diver to carry their own backup air supply will be clarified as requested. **Comment #105**: AED training will be added to the cpr/first aid training. One AED will be present and available. **Comment #106**: This comment has already been addressed in Section 3.3.2.1, page 13. **Comment #107**: This comment has already been addressed on page 54, which states that the Diver Safety Manual will contain information on the nearest hyperbaric chamber. **Comment #108**: This change has already been made.. **Comment #109**: Nicole LaFranchise and Sean Sheldrake will be added to Table 1.

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56.		Appendix J 2.1, Table 1	Yes	Please expand Section 2.1 and Table 1 to address EPA Comments 97 and 109 on the draft DAR regarding identifying the EPA project manager and stating the role of the EPA project manager.	Sean Sheldrake's contact information will be added to Table 1 and a note will be added that for emergencies his cell phone number will be used but will only be provided to personnel as needed. Section 2.1 will be expanded to include Sean Sheldrake as the EPA PM, as well as the Port PM (Nicole LaFranchise)
57.		Appendix J 3.3.2	Yes	Please revise this section to more thoroughly address EPA Comment 99 on the draft DAR regarding commercial diving activities. Please prepare a specific list of activities to be completed under either commercial diving or scientific diving protocols.	The Port has already amended Section 3.3.2 to state that commercial diving will occur and that sampling activites are the only activities that fall under scientific exemption. The text will also be amended to state that all diving activities at this site will be conducted using commercial diving protocols.
58.		Appendix J 3.3.2.4	Yes	Please revise the plan to address EPA Comments 99 and 100 on the draft DAR. A specific item to add is that the Contractor will prepare a detailed dive plan for each dive, and submit the plan to EPA and the Coast Guard to review a minimum of 2 weeks prior to any dive operations.	The Port will make the requested change, however, please note: A two week minimum review period may not be logistically feasible in some situations.
59.		Appendix J 3.3.29	Yes	Please address EPA Comment 101 on the draft DAR regarding dive crews and crew members.	The Port will make the suggested revision.
60.		Appendix J 6.2	Yes	Please address EPA Comment 102 on the draft DAR regarding dive decon. While a contractor dive plan will address commercial diving activities, appropriate safety procedures including decon activities are still warranted for scientific diving.	The Port will make the suggested change.