would be encountered per surface MEC removal team per day. Seeding frequency would be determined at the onset of a project by projecting anticipated field team production. Seeding frequency would be modified, as necessary, throughout the duration of the project based on actual field team production to allow continued achievement of the target rate (03-016, AR# OE-0765B.3; 03-018, AR# OE-0626N).

 Modified the process for demonstrating geophysical system performance (MEC QAPP, KEMRON, 2016a).

The MEC QAPP removed the requirement for a geophysical prove-out and implemented the geophysical system verification approach for verification of system performance in accordance with *Geophysical System Verification (GSV): A Physics-Based Alternative to Geophysical Prove-Outs for Munitions Response* (Environmental Security Technology Certification Program [ESTCP], 2009). The GSV process is a rigorous physics-based program that verifies geophysical system performance using an instrument verification strip (IVS) seeded with industry standard objects (ISO) and an enhanced QC seeding program. Geophysical system response values over the IVS and QC seed items are compared to published response values of the ISO to verify performance of the system prior to and throughout the duration of geophysical mapping activities.

Advanced geophysical classification is addressed in *Final, Quality Assurance Project Plan, Superfund Response Actions, Former Fort Ord, California, Volume II, Munitions Response, Appendix B, Advanced Geophysical Classification for Munitions Response Quality Assurance Project Plan* (AGCMR-QAPP; KEMRON, 2016b).

# 5.4 Remaining Actions

The remaining RAs are summarized below:

- RA implementation and documentation in Units 5, 13, 17, 20, and 31;
- Complete the TM documentation for Ranges 43-48 South;
- Complete subsurface removal in the network of regularly-maintained fuel break system;
- Complete additional actions identified in TMs;
- Complete an evaluation of areas where there are high density anomalies associated with impact areas where military munitions with sensitive fuzes were fired; and

Conduct prescribed burning in required units. Post-remediation prescribed burns may continue to
be implemented after completing MEC removals and potentially after property transfer, as the
Army's ability to conduct a burn is dependent on many factors including weather conditions.

#### 6.0 REMEDIAL ACTION

This section describes general requirements for key work elements of the RA. Planned RAs for a unit or a group of units are presented in unit-specific SSWPs supplemented by TMs. Prescribed burns are described in unit-specific prescribed burn plans and after-action reports. When all work is completed in a unit or a group of units the completed actions are documented in unit-specific RARs. When all RAs are completed a RACR will be developed. A LUCIP will be developed prior to property transfer. Habitat monitoring and reporting will be implemented according to the established protocols.

#### 6.1 Site-Specific Work Plan

Unit-specific SSWPs identify planned work areas and procedures for vegetation clearance, surface MEC removal, subsurface MEC removal, and DGM. Subsurface MEC removal will be conducted in selected areas to address specific concerns regarding MEC risk or reuse needs, such as roads, fuel breaks, and habitat restoration sites. Known areas will be identified in the SSWP. If changes are required to the SSWP a fieldwork variance will be developed to document changes. Additional subsurface MEC removal areas may be identified after surface MEC removal and DGM are completed. These additional areas will be identified in unit-specific TMs.

# 6.2 Vegetation Clearance

Vegetation clearance is required to perform the MEC RA in the Impact Area MRA. Vegetation clearance will be accomplished using prescribed burning, and/or manual and mechanical cutting, depending on site conditions. These areas will be identified in the SSWP.

## 6.2.1 Mechanical and Manual Vegetation Cutting

Mechanical and manual vegetation cutting equipment will be used to cut the vegetation. Manual tools such as trimmers may be used in areas where the mechanical cutter cannot gain access, or to trim tree branches. Trees will be left in place while removing lower branches to allow access for MEC removal teams. Field procedures are described in the MEC QAPP (KEMRON, 2016a).

## 6.2.2 Prescribed Burning

Prescribed burning is the primary method of vegetation clearance in habitat reserve areas containing CMC. One or more areas will be prepared for burning in any given year. Multiple burn events may be conducted











