

## **Response to City Comments of 3-5-21 and March 2021 Revisions to Excavation Management Plan (EMP)**

**City Comment:** For the SWPPP. One of the comments indicated, the map in Appendix B should identify storage, use, and operational locations for non-visible pollutants and the areas of known contaminated soil to be excavated. Based on our review, only the contaminated locations are shown. We do not see the location for the storage or how the pollutants are to be handled.

**Response:** *The EMP notes that contaminated soils will be direct loaded into trucks during excavation and no stockpiling is anticipated.*

**City Comment:** For CMP. The comments indicate CMP should be replaced with a CMP that applies to the activities and areas addressed by the EMP. The existing DEVCON CMP in the EMP addresses demolition activities related to Phase A2. This should be replaced with a CMP that applies to the activities and areas addressed by the EMP.

**Response:** *A revised Devcon CMP dated February 8, 2021 has been included in the Revised March 2021 EMP as Appendix E.*

The following list notes the changes within the March 2021 Revised EMP:

- Dates have been changed for EMP, Dust and Vapor Control Plan, and Sampling and Analysis Plan (SAP). The date for the letter Summary Report (Appendix A to the previous three documents) has also been changed
- As noted above, the Revised CMP of February 8, 2021 has replaced the previous CMP as Appendix F.
- Section 1.3 Storm Water Pollution Prevention Plan (SWPPP) of the EMP has been revised to be consistent concerning the SWPPP.
- Summary Report -Language changes on page 5, top partial paragraph have been made to ensure accuracy of confirmation sampling process.
- Summary Report- Language of last complete paragraph on page 5 has been changed to note submission of the Soil Vapor Investigation Report to the SCCDEH .
- In the SAP, Section 4.1 Sampling Procedures, the 2nd and 3rd paragraphs have been edited to reflect consistency with the changes to page 5 of the Summary Report.

## **Response to City Comments of 3-11-21**

Changes have been made to the PCBs Plan on pages 4 and 5 and Sections 3.1 and 3.2 of the SAP was updated to be consistent with the excavation activities described on pages 4 and 5 of the PCBs Plan, and Section 4.1 of the SAP was updated to be consistent with the confirmation sampling and waste disposal procedures described on pages 4 and 5 of the PCBs Plan.