3.0 IDENTIFICATION OF REMOVAL ACTION OBJECTIVES

3.0.0.0.1 This section summarizes the statutory framework within which this EE/CA has been prepared, outlines the scope and schedule for the removal action, identifies ARARs for the removal action, and discusses the removal action objectives.

3.1 STATUTORY LIMITATIONS OF REMOVAL ACTIONS

3.1.0.0.1 Ordnance and explosive waste, which may be present in the East Elliott area, is included in the CERCLA definition of pollutants and contaminants that require a remedial response (Department of the Army, 1993b). In addition, the California Department of Toxic Substances Control (DTSC) considers UXO to be a hazardous waste under Division 20, Chapter 6.5 of the California Health and Safety Code (HSC). This EE/CA has been prepared in accordance with *Removal Action Planning for Ordnance and Explosive Waste Sites Procedural Document* (CEHNC, 1995), which identifies factors to be considered in determining the appropriateness of a removal action. This EE/CA was prepared in substantial agreement with the requirements of CERCLA, SARA, the NCP as codified in 40 CFR Part 300, and DERP at 10 USC 2701, et seq., and the California HSC, Division 20, chapters 6.5 and 6.8.

3.1.0.0.2 During selection of an appropriate removal action alternative for East Elliott in this EE/CA, the requirements of *Removal Action Planning for Ordnance and Explosive Waste Sites Procedural Document* (CEHNC, 1995) were considered to "…identify the objectives of the Removal Action and to analyze the various alternatives to be used to satisfy these objectives for effectiveness, implementability, and cost." In addition, the requirements of Section 104(c)(4) of CERCLA were considered to "select appropriate remedial actions determined to be necessary . . . which are to the extent practicable . . . and which provide for that cost-effective response which provides a balance between the need for protection of public health and welfare and the environment, and the availability of [funds]."

3.1.0.0.3 The requirements for this EE/CA and its mandated public comment period provide opportunity for public input to the remediation process. The public is encouraged to review and comment on the proposed removal action activities described in this EE/CA. To gain a more thorough understanding of the activities associated with the selected removal action, the public is encouraged to review relevant documents maintained in the information repositories for East Elliott at the Tierrasanta Branch of the San Diego City Library and the Santee Branch of the San Diego County Public Library. Section 2.2 of this EE/CA provides a summary of some of the relevant documents maintained at the information repositories.

3.1.0.0.4 The overall removal action to be implemented for the East Elliott area, pursuant to CEHNC Removal Action Planning guidance (1995), has been designated non-time-critical, which will allow for a public comment period. A non-time-critical removal action is one for which more than 6 months of planning time is available. A time-critical removal action was originally proposed in the draft version of this document, as described in Section 7.1.1 of the CEHNC Removal Action Planning guidance (CEHNC, 1995) and the NCP. However, surface clearance was completed for 900 acres of trails, roads, and open areas in Sector 4 as a Time-Critical Removal Action in February 1999, so no Time-Critical Removal Actions are recommended as part of this EE/CA.

3.2 DETERMINATION OF REMOVAL ACTION SCOPE

3.2.0.0.1 The scope of this EE/CA is to evaluate removal actions that will reduce currently unacceptable risk levels associated with UXO at East Elliott to acceptable levels. Section 4.0 of this document identifies a series of removal actions, ranging from “no action” to full-scale site cleanup (i.e., UXO removal and disposal). The alternatives presented in Section 4.0 are comparatively evaluated based on effectiveness, implementability, and cost (Section 5.0). While the removal action(s) is intended to be the final action, additional removal or remedial actions may be required if land uses change significantly from the assumptions presented in Section 2.1. For comparative purposes, site risks have been calculated for both the current recreational use

and a future construction scenario based on a compilation of available planning documents and information.

3.3 DETERMINATION OF REMOVAL ACTION SCHEDULE

3.3.0.0.1 The schedule for conducting the removal action for East Elliott is dependent upon submittal of the EE/CA Action Memorandum and its review by the regulatory authorities and the public. Public comments/concerns will be considered and incorporated into the Action Memorandum before the removal action is finalized and initiated. The public meeting is tentatively scheduled for late 1999, and the Final Action Memorandum is tentatively scheduled for submittal in January 2000. The removal action schedule will be established during the remedial action design phase, following approval of the Action Memorandum.

3.4 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

3.4.0.0.1 As described in Section 3.1, this EE/CA has been prepared in substantial compliance with the NCP (CEHNC, 1995). The NCP (40 CFR 300) states "Removal actions . . . shall to the extent practicable considering the exigencies of the situation, attain applicable or relevant and appropriate requirements (ARARs) under federal environmental or state environmental or facility siting laws" [40 CFR Part 300.415(I)]. According to the NCP, "applicable," "relevant and appropriate," and "to be considered" are defined as follows:

- Applicable requirements are those cleanup standards, standards of control, or other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a CERCLA site. Only those state standards that are identified in a timely manner and that are more stringent than federal requirements may be applicable.

- Relevant and appropriate requirements are those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state environmental or facility siting laws that, while not "applicable" to a hazardous substance, pollutant, contaminant,

remedial action, location, or other circumstance at a CERCLA site, address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well suited to the particular site. Only those state standards that are identified in a timely manner and that are more stringent than federal requirements may be relevant and appropriate. The relevance and appropriateness of a requirement can be assessed by comparing factors such as the characteristics of the remedial action, the type of hazardous materials encountered, or the characteristics of the site.

- Advisories, criteria, guidance, or proposed standards to be considered (TBC) consist of nonpromulgated advisories, criteria, or guidance documents that were developed by the USEPA, other federal agencies, or states that may be useful in developing CERCLA remedies. TBCs may provide health effects information with a high degree of credibility, technical information on performing or evaluating site investigations or remedial actions, and useful policies for dealing with hazardous substances. Although TBC requirements are not legally binding, they may be evaluated along with ARARs as part of the risk assessment to establish protective target clean-up requirements.

3.4.0.0.2 Further, the CEHNC must select a removal action which substantially complies with CERCLA §121(d)(1) and Division 20, Chapter 6.8 of the California HSC. Pursuant to CERCLA §121(d)(1), as amended by SARA of 1986, removal actions must attain a degree of cleanup that assures protection of human health and the environment. Removal actions that leave hazardous substances, pollutants, or contaminants on site must meet standards, requirements, limitations, or criteria that are ARARs. In addition, the *Removal Action Planning for Ordnance and Explosive Waste Sites Procedural Document* (CEHNC, 1995) requires substantial compliance with ARARs during the course of the removal action to the "extent practicable considering urgency of the situation and the scope of the removal." Federal ARARs for any site may include requirements under any federal environmental laws. State ARARs include promulgated requirements under state environmental or facility-siting laws that are more stringent than any federal ARARs and that have been identified by the state in a timely manner. The NCP provides that where ARARs do not exist, nonpromulgated advisories and guidance issued by the state or federal government programs are "to-be-considered" useful "in helping to determine what is protective at a site or how to carry out certain actions or requirements" [40 CFR Part 300.400(g)(3)].

3.4.0.0.3 To the extent consistent with CERCLA and the NCP, the USACE is not required to obtain federal, state, or local permits for those portions of a removal action conducted entirely on-site, but need only comply with the substantive, not procedural, provisions which would have been included in any such permit.

3.4.0.0.4 ARARs are identified on a site-specific basis from information about specific chemicals at the site, specific actions that are being considered as remedies, and specific features of the site location. There are three types of ARARs:

- **Chemical-specific ARARs** are health- or risk-based numerical values or methodologies that, when applied to site-specific conditions, result in the establishment of numerical values. These values establish the acceptable amount or concentration of a chemical that may be found in, or discharged to, the ambient environment.

- **Location-specific ARARs** are restrictions placed on the concentration of a chemical or the activities to be conducted solely because they are in a specific location. Examples of special locations possibly requiring location-specific restrictions include floodplains, wetlands, historic places, and sensitive ecosystems or habitats.

- **Action-specific ARARs** are usually technology- or activity-based restrictions or requirements for remedial actions. These ARARs do not determine the alternative to be applied at a site; rather, they indicate how a selected alternative will be implemented. The potential action-specific ARARs will vary depending on the alternatives selected for the sites.

3.4.0.0.5 According to the NCP, an ARAR may be waived under the following circumstances:

- The alternative is an interim measure and will become part of a total remedial action that will attain the applicable or relevant and appropriate federal or state requirement.

- Compliance with the ARAR will result in greater risk to human health and the environment than other alternatives.

- Compliance with the ARAR is technically impracticable from an engineering perspective.

- The alternative will attain a standard of performance that is equivalent to that required under the otherwise applicable standard, requirement, or limitation, through use of another method or approach.

- With respect to a state ARAR, the state has not consistently applied or demonstrated the intention to consistently apply the standard, requirement, criteria, or limitation in similar circumstances at other remedial action sites within the state.

3.4.0.0.6 CERCLA, the NCP, and the California HSC do not provide across-the-board standards for determining whether a particular remedy will result in an adequate cleanup at a particular site. Rather, the process recognizes that each site will have unique characteristics that must be evaluated and compared to those requirements that apply under the given circumstances. Therefore, identification of ARARs is done on a site-specific basis. The proposed removal action, the hazardous substances present at the site and their physical characteristics, the physical characteristics of the site itself, and the potential receptor population(s) must all be considered when determining which requirements are applicable or relevant and appropriate to the selected removal action for East Elliott. Potential chemical-, location-, and action-specific ARARs and TBCs for East Elliott have been identified by reviewing the federal regulations databases and miscellaneous guidance documents, CEHNC guidance documents, and state regulations and criteria. The following sections discuss the ARARs and TBCs that were considered for East Elliott.

3.4.1 Chemical-Specific ARARs

3.4.1.0.1 Chemical-specific ARARs are health- or risk-based concentration limits or limits specified by treatment methodologies for various environmental media (e.g., groundwater, surface water, air, soil, and sediment) that are established for a specific chemical that may be present in a specific medium at the site, or that may be discharged to the site during remedial activities. The U.S. Environmental Protection Agency (USEPA) does not provide chemical-specific ARARs, advisories, criteria, or guidance for the detection, removal, destruction and disposal of UXO. The Army and DOD maintain “performance standard” type regulations

regarding ordnance removals; however, these potential ARARs are considered action-specific (Section 3.4.3).

3.4.1.0.2 In response to Section 107 of the Federal Facility Compliance Act of 1992 (Public Law 102-386), USEPA finalized the Military Munitions Rule (40 CFR Part 260 et. al.) which identifies when conventional and chemical military munitions become a hazardous waste under RCRA. OE may be considered a hazardous waste because it meets the reactivity characteristics as discussed in 40 CFR Part 261.23; however, materials used for their intended purpose are not considered wastes under RCRA Subtitle C. According to the Military Munitions Rule, military munitions used for their intended purpose, including the training of military personnel, are not a solid waste. Furthermore, the USEPA postponed final action on a provision that would have identified a military munition left on a range transferred from military control (e.g., FUDS) as meeting the statutory definition of solid waste in RCRA section 1004(27). However, the rule clarifies that used or fired munitions are solid wastes when they are removed from their landing spot and transported off range. Therefore, any munition debris or UXO shipped off site for treatment or disposal is a solid waste, and if a hazardous waste (i.e., UXO), would be subject to the requirements of RCRA Subtitle C. This rule is consistent with Army policy that OE recovered from a FUDS is subject to applicable federal, state, and local hazardous waste management and cleanup requirements (CEHNC, 1995).

3.4.1.0.3 The Military Munitions Rule also sets forth requirements for explosives and munitions emergency response. The definition of an explosives and munitions emergency includes a situation involving the suspected or detected presence of UXO "that creates an actual or potential imminent threat to human health, including safety, or the environment, including property, as determined by an explosives or munitions emergency response specialist." According to the Military Munitions Rules, explosives and munitions emergency responses are exempt from RCRA permitting and other substantial requirements (40 CFR Part 264).

3.4.1.0.4 Removal response authority with respect to military munitions is under the jurisdiction of the DOD as prescribed by 40 CFR Part 300.120. Under this authority, the DOD is

proposing a rule that identifies a process for evaluating appropriate response actions on closed, transferred, and transferring Military Ranges. According to the proposed DOD Range Rule (32 CFR Part 178), transferred ranges are ranges that have been transferred to nonmilitary entities and include FUDS. The proposed Range Rule states that it would not apply to "any closed, transferred, or transferring range that, upon the effective date of the [Range Rule]," ..." is undergoing response activities pursuant to any specific statutory authority or pursuant to any cleanup agreement that has taken effect prior to the effective date of the [Range Rule]. Should, however, any aspects of these regulations be useful in making a given response more efficient, effective, or protective, then nothing in this [Range Rule] shall prohibit their application upon mutual consent of the parties." The proposed DOD Range Rule is therefore TBC guidance for the response actions at East Elliott. One of the most significant aspects of the proposed range rule is that DOD may determine that a response "fails" if too many people move close to munitions-contaminated ranges (e.g., an unanticipated change in future land use) and would therefore require that a new, more protective response be implemented (Pacific Studies Center, 1997).

3.4.1.0.5 The California DTSC has deferred adopting the Military Munitions Rule. This deferral is based upon the "due diligence of the U.S. EPA and DOD in adopting regulations for military munitions" (Harris and Stack, 1996). However, the California DTSC has taken the position that OE on closed, transferred, and transferring ranges meets the definition of a solid waste, and can therefore be defined as a hazardous waste if reactive characteristics are present, such as for UXO.

3.4.2 Location-Specific ARARs

3.4.2.0.1 Location-specific ARARs set restrictions on remediation activities, depending on the location of a site and conditions in its immediate vicinity. None of the location-specific ARARs for the protection of wetlands or farmlands apply at this site because no wetlands or farmlands are present within East Elliott area. However, the following location-specific ARARs may apply to any response actions at East Elliott:

- National Environmental Policy Act (NEPA) of 1969
- Endangered Species Act of 1973 as amended
- National Historic Preservation Act of 1966
- Army Regulation (AR) 200-1, Environmental Protection and Enhancement
- California HSC
- California Endangered Species Act
- California Environmental Quality Act (CEQA)
- California Natural Community Conservation Program (NCCP) Act of 1991

Potential location-specific ARARs are described in Table 3-1.

3.4.2.0.2 The MSCP Plan for Northwestern San Diego County (Ogden Environmental, 1996) is TBC guidance for any remedial actions performed at East Elliott. As described in Section 2.1.3, the MSCP is a comprehensive habitat conservation planning program for southwestern San Diego County developed cooperatively by participating jurisdictions, special districts, wildlife agencies, property owners, and representatives of the development industry and environmental groups. The purposes of the MSCP are to protect biodiversity and to identify priority areas for conservation. The MSCP Plan will also serve as: 1) a multiple species Habitat Conservation Plan pursuant to Section 10(a) of the federal Endangered Species Act and 2) a Natural Community Conservation Program pursuant to the California NCCP Act of 1991 and the state Endangered Species Act. The Elliott Community Plan (City of San Diego Planning Department, 1971) is incorporated into the MSCP by reference and includes provisions for habitat conservation.

3.4.3 Action-Specific ARARs

3.4.3.0.1 Action-specific ARARs are technology- or activity-based requirements or limitations for actions conducted at a site during remediation. Performance, design, and other action-specific requirements set controls or restrictions on certain kinds of remedial activities related to management of hazardous substances, pollutants, and contaminants. The following action-specific ARARs have been identified as potentially applicable to any removal action at East Elliott:

TABLE 3-1

LOCATION-SPECIFIC ARARs
EAST ELLIOTT
(Page 1 of 2)

ARAR	Standard, Requirement, Criterion, or Limitation	Description	Comments
National Environmental Policy Act (NEPA) (42 USC 386 et seq), under Army Regulation 200-2 Environmental Effects of Army Actions	Public Law 91-190, AR 200-2	Requires all Federal agencies to consider environmental effects of programs, projects, and actions before initiating them. Requires the Army to analyze and to document the environmental impacts of alternatives before implementation.	NEPA requirements have previously been met through the preparation of an environmental assessment of East Elliott.
Endangered Species Act of 1973 (16 USC 1551), under Army Regulation 200-3, Natural Resources - Land, Forest, and Wildlife Management	50 CFR 17, Public Law 93-205, AR 200-3 Ch. 11	Requires consultation with the U.S. Fish and Wildlife Service to determine if a Federal action will affect threatened or endangered wildlife species, and to ensure that any action not jeopardize the continued existence or result in the destruction of habitat of any endangered or threatened species. Provides policy and guidance to avoid and to minimize any adverse impacts on protected animal and plant species and their habitat under the federal and state endangered species acts.	Several species on the federal and state endangered or threatened species lists are found within East Elliott. Any removal actions taken at the site must not jeopardize these species.
National Historic Preservation Act of 1966, as amended 1980 (16 USC §470)	Public Law 89-665, 300 CFR 800 Sec. 106	Requires action to locate, identify, evaluate, and protect cultural resources.	May apply if clearance activities are performed within or around the archaeological site (extensive base camp, Site CA-SDI-10, 054, associated with a larger Native American village site) in Sector 4.
Army Regulation, Environmental Protection and Enhancement	AR 200-1	Prescribes Army responsibilities, policies, and procedures to preserve, protect, and enhance environmental resources, including valued habitat, sensitive species, etc.	Will require any response action at East Elliott to minimize adverse environmental impacts and to select actions that enhance natural resources.

TABLE 3-1

LOCATION-SPECIFIC ARARs
EAST ELLIOTT
(Page 2 of 2)

ARAR	Standard, Requirement, Criterion, or Limitation	Description	Comments
California Health and Safety Code	California HSC, Div. 20, Ch. 6.5 and 6.8	Adopts provisions of RCRA and CERCLA.	Under this code, the State of California considers OE to be a hazardous waste.
California Endangered Species Act	California Fish and Game Code 2050-2098	Sets state policy to conserve, protect, restore, and enhance any endangered or threatened species and its habitat, including acquisition of lands for this purpose.	Any removal actions taken at the site must not jeopardize federal and state endangered or threatened species at East Elliott.
California Environmental Quality Act (CEQA)	Public Resources Code §21000 et seq.	Requires public agency decision makers to document and to consider the environmental implications of their actions.	Will require any removal action to minimize environmental impacts.
California NCCP Act of 1991	California Fish and Game Code 2800-2840	Identifies and provides for the regional protection and perpetuation of natural wildlife diversity, while allowing compatible and appropriate development and growth.	The MSCP for San Diego County meets the requirements of the NCCP Act.

AR Army Regulation
CFR Code of Federal Regulations
USC United States Code

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980
- Standards Applicable to Generators of Hazardous Waste (40 CFR Part 262)
- Standards Applicable to Transporters of Hazardous Waste (40 CFR Part 263)
- Department of Transportation (DOT) Hazardous Material Transportation Regulations (49 CFR Parts 107, 171-177, and 100-199)
- Federal Occupational Safety and Health Act (OSHA) of 1970, as amended
- Hazardous Waste Operations and Emergency Response (29 CFR Part 1910.120) under Engineer Regulation (ER) 385-1, Application of the Hazardous Waste Operations and Emergency Response Regulation to Ordnance and Explosives Sites
- AR 385-10, Army Safety Program
- DOD Ammunition and Explosive Safety Standards (DOD 6055.9-STD)
- AR 200-1, Environmental Restoration and Enhancement
- Clean Air Act, as amended
- Clean Water Act of 1977
- California Health and Safety Code (HSC), Division 20, Chapter 6.5
- Rules and Regulations, San Diego Air Pollution Control District

Potential action-specific ARARs are described in Table 3-2.

3.4.3.0.2 Federal, state, and local permits are not required by CERCLA or the NCP if the OE response actions are conducted entirely on site and the requirements of the NCP (40 CFR Part 300) are substantially followed. Permits may be required if the OE is moved off site (CEHNC, 1995). Transportation, storage, and destruction permits are not required when performing an explosives and munitions emergency response as described in 40 CFR Part 264. CERCLA Section 121(e)(1) guarantees the state the right to enforce any federal or state standard, criteria, etc., applicable to the response action.

TABLE 3-2

ACTION-SPECIFIC ARARs
EAST ELLIOTT
(Page 1 of 3)

ARAR	Standard, Requirement, Criterion, or Limitation	Description	Comments
CERCLA as amended by SARA (42 USC 9601 et seq, Sec 103-103, 107,119)	Public Law 102-386	Requires that certain factors be considered in selecting the response action(s).	Will impact implementation of any removal action.
Standards Applicable to Generators of Hazardous Waste	40 CFR 260	Provides standards that apply to people and companies generating hazardous wastes within the U.S., including UXO.	Will impact the proposed removal action only if UXO is removed from the site.
Standards Applicable to Transporters of Hazardous Waste	40 CFR 263	Provides standards that apply to people and companies transporting hazardous wastes within the U.S., and determines if the transportation requires a manifest.	Any UXO removed from the site shall be manifested and transported in accordance with these regulations. The transporter of such materials is required to have an EPA identification number and cannot accept hazardous waste for transport unless it is accompanied by a completed manifest.
DOT Hazardous Material Transportation Regulations	49 CFR 107, 171-177, and 100-199	Sets forth requirements for transporters of hazardous wastes off-site, including completion of manifests.	Any transporter handling OE removed from the site is required to adhere to DOT regulations.
Federal Occupational Health and Safety Act (OSHA) of 1970, as amended	29 CFR Sec. 1919.1200	Provides health and safety regulations applicable to hazardous waste and emergency response operations.	Topics addressed in these regulations include training, hazard communication, personal protective equipment (PPE), and use of qualified personnel.

TABLE 3-2

ACTION-SPECIFIC ARARs
EAST ELLIOTT
(Page 2 of 3)

ARAR	Standard, Requirement, Criterion, or Limitation	Description	Comments
Hazardous Waste Operations and Emergency Response under Application of the Hazardous Waste Operations and Emergency Response Regulation to OE Sites	29 CFR Part 1910.120, ER 385-1	Addresses worker health and safety issues and requires all site workers to have 40 hours of certified Hazardous Waste Operations and Emergency Response (HAZWOPER) instruction.	Will impact workers involved in site removal actions by mandating that only HAZWOPER-certified personnel be allowed to do field work.
Army Safety Program	AR 385-10	Sets forth safety and health requirements for Army activities, including environmental restoration.	Applies to any action taken at East Elliott.
DOD Ammunition and Explosive Safety Standards	DOD 6055.9-STD	Requires use of UXO-qualified personnel for detection, removal, and disposal of OE and requires specific safety procedures be followed during disposal operations.	These standards will be followed in the event that suspected UXO are recovered in East Elliott. Only personnel essential to operation will be allowed in the restricted area during UXO activities.
Environmental Restoration and Enhancement	AR 200-1	Provides requirements for hazardous materials management, oil and hazardous substances spills, waste management, pollution prevention, and environmental restoration.	Has a broad application to any restoration or removal action performed at East Elliott.

TABLE 3-2

ACTION-SPECIFIC ARARs
EAST ELLIOTT
(Page 3 of 3)

ARAR	Standard, Requirement, Criterion, or Limitation	Description	Comments
Clean Air Act, as amended (42 USC 7401 et seq) per AR 200-1 (Ch. 6)	Public Law 91-604, 40 CFR 50 et seq	Requires compliance with all federal, state, interstate, and local requirements respecting the control and abatement of air emissions, including establishment of air quality standards to promote and to maintain public health and welfare.	Affects use of brush cutting tools such as chain-saws and brush clearance by prescribed burns.
Clean Water Act of 1977 (33 USC 1151 et seq, 1251 et seq, 40 USC 3906 et seq) per AR 200-1 (Ch. 2)	Public Law 95-217	Establishes standards for the protection of surface and ground water quality, and for restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters.	Removal actions will not result in the degradation of any surface water through the discharge of potential contaminants or increased erosion. May require preparation of a Storm Water Pollution Prevention Plan.
California Health and Safety Code	California HSC, Div. 20, Ch. 6.5 and 6.8	Adopts provisions of RCRA and CERCLA.	Under this code, the State of California considers OE to be a hazardous waste.
Rules and Regulations, San Diego Air Pollution Control District	NA	Requires compliance with all requirements respecting the control and abatement of air pollution.	Affects use of brush cutting tools, such as chain-saws, and brush clearance by prescribed burns.

AR Army Regulation
CFR Code of Federal Regulations
DOD Department of Defense
EM Engineer Manual
ER Engineer Regulation
NA Not Available
TM Technical Manual
USC United States Code

3.4.3.0.3 The following action-specific TBC guidance documents have been identified as potentially applicable to the removal action for East Elliott:

- *Removal Action Planning for Ordnance and Explosive Waste (OEW) Sites Procedural Document* (CEHND 1115-3-524)
- *OEW Management Plan* (CEHND 1105-1-9)
- Department of the Army TM 5-630, *Natural Resources - Land Management*
- Department of the Army, TM 5-633, *Natural Resources - Fish and Wildlife Management*
- Department of the Army, TM 5-801-2, *Historic Preservation Maintenance Procedures*
- *Draft Public Involvement Plan for Ordnance and Explosives Response* (ETL 1110-1-170)
- San Diego County Chaparral Management Program (1981)
- San Diego County Open Burn Program, San Diego Air Pollution Control District (1985) Department of Agriculture, Weights, and Measures

Potential action-specific TBC guidance documents are described in Table 3-3.

3.4.3.0.4 In addition to those ARARs and TBC guidance documents cited above, the Army and USACE have developed several safety standards that set forth guidance for handling, transporting, and disposing of explosive items. The Army regulations should be considered action-specific ARARs, and associated manuals and guidance documents as TBC. These safety standards include the following documents:

- AR 385-10, Army Safety Program
- AR 385-60, Coordination with DOD Explosives Safety Board
- AR 385-64, Ammunition and Explosives Safety Standards

TABLE 3-3

ACTION-SPECIFIC TBCs
EAST ELLIOTT

TBC	Reference	Description	Comments
Detection Technology	EP 110-1-16 (Draft)	Provides guidance for selecting technology for detection of OE based on physical properties and site conditions.	Affects implementation of all removal (clearance) actions.
Military Explosives	TM 9-1300-214	Prescribes procedures for the detection and identification of suspected explosive materials.	Applies to any removal action performed at East Elliott.
Removal Action Planning for OEW Sites Procedural Document	CEHND 1115-3-524	Presents the procedures for project planning and implementing CERCLA at OE sites.	Applies to all potential actions at East Elliott, including any actions that do not involve removal of OE.
Draft Public Involvement Plan for Ordnance and Explosives Response	ETL 1110-1-170	Sets forth site-specific program guidance for managing the communications strategy for OE response actions.	Applies to the public involvement aspect of any potential removal action.
San Diego County Chaparral Management Program (1981)	NA	Specifies methods for clearing and trimming brush.	May impact use of controlled burns to clear brush for removal actions.
San Diego County Open Burn Program, San Diego Air Pollution Control District (1985)	NA	Sets forth requirements for controlled burns, and requires submittal of a prescribed burn plan to the City of San Diego Fire Department. Also requires a permit be obtained.	May impact use of controlled burns to clear brush for removal actions.

EP Engineer Pamphlet
TM Technical Manual
ETL Engineer Technical Letter
NA Not Available

- AR 190-11, Physical Security of Arms, Ammunition, and Explosives
- ER 385-1-92, Department of the Army, Safety and Health Document Requirements for Hazardous, Toxic, and Radioactive Waste and Ordnance and Explosive Waste
- Engineer Manual (EM) 385-1-1, USACE Safety and Health Requirements Manual
- Department of the Army, Technical Manual (TM) 9-1300-206, Ammunition and Explosives Standards
- Department of the Army, TM 9-1300-214, Military Explosives
- Engineer Technical Letter (ETL) 385-1-1, Draft Safety Concepts and Basic Considerations for UXO Operations
- ETL 385-1-2, Draft Generic Scope of Work for Ordnance Avoidance Operations (OE CX Interim Guidance)

3.5 REMOVAL ACTION OBJECTIVE

3.5.0.0.1 The removal action objective for East Elliott is to achieve an acceptable level of risk to human health and the environment from potential exposure to UXO based on current and future land uses, while considering the practicality of the removal action with regard to cost, effectiveness, and implementability. In achieving this removal action objective, ARARs will be adhered to as practicable.