Explanation of Significant Differences

Tisbury Great Pond Munitions Response Site

FUDS Project No.
D01MA0453

Martha's Vineyard, MA

November 2024

U.S. Army Engineering and Support Center, Huntsville
U.S. Army Corps of Engineers, New England District

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ACRONYMS AND ABBREVIATIONS

AR	Administrative Record
bbs	below bathymetric surface
bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DD	Decision Document
DGM	digital geophysical mapping
ESD	Explanation of Significant Differences
FS	Feasibility Study
FUDS	Formerly Used Defense Site
IVS	Instrument Verification Strip
LUC	Land Use Control
MA	Massachusetts
MassDEP	Massachusetts Department of Environmental Protection
MD	munitions debris
MEC	munitions and explosives of concern
MHT	mean high tide
MPPEH	material potentially presenting an explosives hazard
MRS	munitions response site
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
RAO	remedial action objective
RI	Remedial Investigation
TOI	Targets of Interest
TTOR	The Trustees of Reservations
USACE	United States Army Corps of Engineers
UU/UE	unlimited use/unrestricted exposure
UXO	Unexploded Ordnance

1.0 INTRODUCTION

This Decision Document (DD) presents a description of the modification to the preferred remedy at Tisbury Great Pond (TGP), as originally detailed in the *Decision Document, Tisbury Great Pond Munitions Response Site,* Martha's Vineyard, Massachusetts [MA], U.S. Army Corpsof Engineers, New England District, May 2016. The DD was approved by Karen Baker, Acting Chief, Environmental Community of Practice on 22 June 2016.

1.1 Site Name and Location

The Formerly Used Defense Site (FUDS) TGP, FUDS Property No. D01MA0453, is located on Martha's Vineyard, MA. The munitions response site (MRS) covered under this DD is:

- TGP MRS (Project 01), 123 acres

The TGP Site is located in Dukes County in the town of West Tisbury and Chilmark, Martha's Vineyard, MA. TGP encompasses approximately 1,082 acres. The site was divided into two MRSs: TGP MRS (Project 01) (123 acres), which comprises the munitions and explosives of concern (MEC) contaminated land and water portion, and the Remaining Land and Water MRS (Project 02) (959 acres), which comprises the remaining uncontaminated land and water portion.

The TGP MRS is comprised of land, inland water, and ocean areas. The land portion contains upland brush, upland grass, beach, and dune areas. The upland brush area consists of knee-high scrub brush extending from the upland grass area inland. The upland grass area is the land area between the beach and upland brush areas. The beach area extends from the toe of the dune to TGP and the ocean's edge (mean high tide [MHT]). The dune area is surrounded by the beach area to the north and west and upland grass area to the east. The inland water and ocean areas are comprised of inland water in the pond and ocean surf zone that extends from MHT out to a maximum of 600 ft into the ocean. Currently, the MRS is owned by The Trustees of Reservations (TTOR), the Commonwealth of Massachusetts, and private landowners.

1.2 Lead and Support Agencies

The Department of the Army is the lead agency. The United States Army Corps of Engineers (USACE) is the executing agency for investigating, reporting, evaluating and implementing remedial actions at the TGP site. USACE, New England District is the FUDS project management District. The Massachusetts Department of Environmental Protection (MassDEP) is the lead regulatory agency.

1.3 Legal Authority for Explanation of Significant Differences

This Explanation of Significant Differences (ESD) has been prepared to provide the public with an explanation of and to document a USACE modification of the selected remedy for the FUDS TGP site. Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 United States Code §96 I 7(c), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) at Title 40 Code of Federal Regulations (CFR) §300.435(c)(2)(i) requires that an ESD be prepared when differences or changes in the remedial action significantly change, but do not fundamentally alter the remedy selected in the DD with respect to scope, performance, or cost.

1.4 Summary of Circumstances Requiring an Explanation of Significant Differences

The circumstances that have led to this ESD are detailed in Section 2.0. During the remedial investigation (RI), the geophysical equipment's limit of detection of items was a depth of 3 feet deep. As such, the selected remedy was for a subsurface remediation of MEC to a depth of 3 feet (Section 2.2). However, during the Remedial Action (RA), several MEC items were recovered at depths greater than 3 feet due to favorable orientation of items and/or pursuing and clearing in a particular excavation below 3 feet (Section 2.3), which is beyond the consistent detection depth of the geophysical detectors.

1.5 Administrative Record

This ESD will become part of the administrative record (AR) file for the TGP site, Project D01MA0453, in accordance with the NCP at 40 CFR §300.825(a). For the TGP site, an AR has been established at the West Tisbury Public Library (open Mon-Wed 10am – 6pm, Thurs 9am-6pm, Fri 10am-5pm, Sat 9am-5pm, and Sun 12pm-4pm), 1042 State Rd, West Tisbury, MA 02575, and in Concord, MA, at the New England District Office. Public notice of the ESD will be published in *The Martha's Vineyard Times and the Vineyard Gazette*.

2.0 SUMMARY OF SITE HISTORY, CONTAMINATION AND SELECTED REMEDY

This section provides a summary of site history, contamination issues, and the selected remedy being implemented.

2.1 Site History and Contamination

Site Description. Freshwater from adjacent lands flow into TGP, a brackish pond. Several times to as many as 5 times or more a year, the barrier beach is manually breached by the Riparian Owners Association to hydraulically connect the pond to the ocean to allow the pond to discharge freshwater to the Atlantic Ocean and allow saltwater to enter the pond, thereby increasing the pond's salinity, lowering the pond's water level, and improving the overall health of the pond. The barrier beach breach (also known as "the Cut") closes naturally after each of these events. The breach locations were initially started on the western edge of the barrier beach/pond and gradually over time moved eastward with each successive breach east of the previous one. In addition to the scheduled breach openings, natural breaches have also occurred as a result of storms. The breach closes naturally after several days, weeks, or months.

Site History. Between 1943 and 1947, the TGP MRS was used as a practice bombing and strafing range. The site was utilized to support the U.S. Navy's fighter training program at Quonset Point Naval Air Station, Rhode Island and the Naval Auxiliary Air Station, Martha's Vineyard, MA. Military practice ordnance potentially used at the site included 0.30 and 0.50 caliber ammunition, miniature (3-5 pounds [lbs]) practice bomb series including AN-Mark (MK)5 Mod1, MK23, and MK43; and large (100-500 lbs) practice bomb series including AN MK5, MK15, and AN-MK21. A site inspection and historical photographs confirmed the presence of ordnance on 24 acres of land located around the practice bombing and strafing target area. The site inspection team discovered what appeared to be an MK15 series 100-lb sand or water-filled bomb.

Site Inspection (SI). The SI was conducted to determine the presence or absence of MEC or munitions constituents (MC) related to the historical use of the property. A qualitative site reconnaissance was conducted on 29 January 2008 on approximately 4.49 acres of land and water. The site reconnaissance

included a magnetometer-assisted survey following a meandering path in and around sampling locations to document the practice bombing and strafing target locations, as well as MEC, munitions debris (MD), or other features of interest. During the reconnaissance, one underwater anomaly was detected in approximately 4 ft of water in the eastern portion of the pond, and one subsurface anomaly was detected. No MEC or MD were found. MC sampling for explosives and metals (antimony, copper, lead, nickel, strontium, and zinc) analysis was conducted for the site. Sampling activities consisted of collecting seven (including one duplicate) discrete surface (0 to 6 inches below ground surface [bgs]) soil samples, two background surface soil samples, one discrete subsurface (20 to 26 inches bgs) soil sample, six (including one duplicate) sediment samples, two background sediment samples, and three (including one duplicate) surface water samples. Based on the screening level human health and ecological risk assessments, the SI Report recommended an RI be conducted to determine the nature and extent of MEC and MC at the site.

Emergency Responses. Between 24 February 2009 and 13 July 2011, Navy EOD and the Massachusetts State Police Bomb Squad responded to nine emergency calls associated with potential ordnance. Four MEC items were discovered and destroyed. In addition, multiple MD items were identified, inspected, determined to be free of explosive hazard, and removed and secured.

Remedial Investigation. The RI was initiated in 2009 and was completed in 2014. It was conducted to determine the nature and extent of potential MEC and MC resulting from historical military activities at the TGP site. Key findings of the RI included 8 MEC, 31 MD, and 254 non- munitions related debris (NMRD) items were recovered from the land, beach, inland water, and ocean areas, with the highest density of munitions items near the "Cut" area. MEC items encountered included AN-MK23 3-pound practice bombs with intact spotting charges. MD items included expended AN-MK23s and remnants of 100-pound practice bombs, including an inert spotting charge. Within the investigation area, MEC was found between 6 inches and 3 ft bgs. Soil, sediment, and groundwater samples were collected and analyzed for explosives and metals (i.e., antimony, copper, lead, nickel, and zinc). A Human Health Risk Assessment (HHRA) and Screening Level Ecological Risk Assessment (SLERA) were also performed to evaluate risks due to potential MC contamination. The HHRA concluded that there are no unacceptable risks to human health from MC and the SLERA concluded that MC does not pose unacceptable risks to ecological receptors. The RI recommended that the TGP site be subdivided into two MRSs: TGP MRS (123 acres) and the Remaining Land and Water MRS (959 acres). The TGP MRS was recommended for further evaluation in the FS due to the MEC hazards. The RI also concluded that only MEC remedial alternatives would be developed since MC risk to both human and ecological receptors was determined to be negligible. Because there was no evidence of MEC hazards within the Remaining Land and Water MRS, a No Further Action recommendation was made at the completion of the RI and that MRS was not carried forward to the FS.

Feasibility Study (FS). A FS was conducted to identify, develop, and evaluate potential remedial alternatives that would meet the remedial action objective (RAO) for the TGP MRS. The RAO identified was "to reduce the unacceptable probability of MEC encounter at the MRS such that a negligible probability of encounter can be supported for recreational users, landowners, visitors, and workers conducting activities such as boating, fishing, periodic excavation of beach to open the pond to the ocean, and swimming at the MRS from explosive hazards associated with MEC exposure:

- in and below the dunes (potentially up to 6 ft)
- in the top 3 ft of subsurface soil or sediment
- during intrusive activities

- dune erosion.

Four remedial alternatives were evaluated during the FS including Alternative 1: No Action, Alternative 2: Land Use Controls (LUCs), Alternative 3: Partial Subsurface Clearance with LUCs, and Alternative 4: Subsurface Clearance. Alternative 4, Subsurface Clearance, most favorably met all of the NCP evaluation criteria as compared to other remedial alternatives (USACE, 2015b).

2.2 Remedy Selection

As documented in the 2016 DD, the selected remedy by the USACE was Alternative 4 Subsurface Clearance, which includes: "subsurface detection, removal, and disposal of munitions located within the MRS (123.1 acres); and interim LUCs in the form of public education and notification until UU/UE (unlimited use/unrestricted exposure) is achieved….After all clearance operations are complete, a review of the site will be made (similar to a CERCLA 5 Year Review) that will ensure the effectiveness of the remedial actions for UU/UE."

2.3 Remedy Implementation

The selected remedy for TGP was implemented in 2018 and concluded in 2021. The following paragraphs describe pertinent details of the RA.

The specific components of the selected remedy were:

- Mobilization
- Site management
- Survey and Positioning
- Environmental coordination
- Brush clearing (where needed)
- Dune excavation and sifting/inspection
- 'Mag and dig' within the ocean area
- Digital geophysical mapping (DGM) and data analysis
- Anomaly reacquisition and resolution
- Anomaly and MEC removal
- Material potentially presenting an explosives hazard (MPPEH) disposal
- MDAS waste stream treatment offsite disposal
- Site Restoration
- Demobilization
- Post construction vegetation monitoring
- Development and reproduction of training materials
- Annual Interim LUCs which included annual ordnance training, site inspections, and sign maintenance.

Prior to the collection of DGM data, Instrument Verification Strips (IVSs) for land and water were established. For the land IVS, it was established (between direct comparisons among data acquired for both Cape Poge and Tisbury Great Pond) that the smallest Target of Interest (TOI), the MK23 practice bomb, could be detected by the DGM sensors up to 36-inches bgs at the worst-case orientation (i.e., horizontal). Therefore, 36-inches bgs was determined as the minimum detection and clearance depth benchmark on land to which greater depths may be achieved from more favorable TOI orientations (i.e.,

vertical) or preferential environments (e.g., benign clean sand, salt water intrusions). Through similar comparative analyses between Cape Poge and Tisbury Great Pond for the water IVS, the MK23 practice bomb TOI could be detected at 32-inches below bathymetric surface (bbs) at the worst-case orientation from an estimated flight height of 18-inches above the saltwater-sediment surface. Dissimilar to the land operations which the sensor was a stable height above ground surface (for the most part except small jumps/bumps), the underwater array had a variable height above sediment surface between one and two feet (nominally 18-inches) and the distance was tracked during collection for clear understanding where detection to 3 feet was definitely met, could have been met, and/or likely wasn't met, pending the favorability of the TOI orientations, environmental conditions, or whether the platform was raised to avoid an obstacle. Thus, common to both land and marine surveys, a minimum detection and clearance depth was established to which greater depths can be achieved, primarily from more favorable orientations or reduced sensor height above ground or bathymetric surface.

For the land portion of the MRS, DGM surveys were performed across the original MRS and MRS stepout areas where MEC was found near the MRS boundaries and the 100 foot 360 degree clearance in all directions from the last known MEC find were not met. A total of 43 acres were geophysically mapped and 3,482 geophysical anomalies were investigated by Unexploded Ordnance (UXO)-qualified teams. For the Land MRS, a total of 43 acres were cleared of MEC to 3 ft bgs. Items recovered included 10 MEC/UXO items (AN-MK23 practice bombs, one AN-M46 Photoflash Bomb and an unspecified flare fuze) and approximately 151 pounds of MD (MK15, AN-MK23, and AN-MK6), 7 pounds of small arms debris (0.50 caliber and shotgun debris) and 9,710 pounds of non-munitions related debris. The MEC/UXO items were recovered at depths ranging from the surface to forty inches bgs with 90 percent (%) of the items found within three feet.

For the inland water portion of the MRS, DGM surveys were performed across the majority of the original MRS boundary and MRS stepout areas to attain the 100 foot 360 degree clearance in all directions from the last known MEC find, while areas unsuitable for DGM were surveyed via analog methods. A total of 75 acres were geophysically mapped and 1,007 geophysical anomalies were investigated and resolved by UXO qualified divers. Items recovered included 235 MEC/UXO items (AN-MK23 practice bombs and AN-MK6 flare fuze) and approximately 57 pounds of MD (MK15 and AN-MK23), and 4,422 pounds of non-munitions related debris. The MEC/UXO items were recovered at depths ranging from the surface to 40 inches (bbs) with 99% of the MEC/UXO items found within the top three feet.

For the ocean water portion of the MRS, 33 acres were surveyed via analog methods as DGM surveys were unsuitable. A total of 34 acres were geophysically mapped and 105 geophysical anomalies were investigated and resolved by UXO qualified divers. Items recovered included 40 MEC/UXO items (AN-MK23 practice bombs) and approximately 25 pounds of MD (AN-MK23), 2 pounds of small arms debris (0.50 caliber and shotgun debris) and 905 pounds of non-munitions related debris. The MEC/UXO items were recovered at depths ranging from the surface to 18 inches (bbs) with 100% of the MEC/UXO items found within the top three feet.

3.0 BASIS FOR SIGNIFICANT DIFFERENCES

Several MEC items were recovered deeper than demonstrated as detectable by the technological equipment applications in the land and water IVSs at the orientations and depths tested. For the Land portion of the MRS, 1 of the 10 MEC items were recovered at depths greater than 36 inches. For the Inland water portion of the MRS, 1 of the 235 MEC items were recovered at depths greater than 36

inches. In addition, many MEC items were reported at depths of exactly 36 inches. For the ocean portion of the MRS none of the 40 MEC items were recovered at depths greater than 36 inches. Deeper items could have been detected and then removed through one of three common scenarios: 1) removal of overburden during investigation creating a shallower path to deeper items; 2) incidental recovery of deeper items after recovery of shallower items; or 3) detection/recovery easement due to preferential orientation (i.e., vertical) generating a larger digital response signal than otherwise possible (i.e., worst-case horizontal).

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES

Difference #1 MRS vs Remedial Action (RA) Acreage.

The text of the 2016 DD stated that the TGP MRS size was 123.1 acres in size and the entire MRS would be remediated. Figure 2-2 of the DD has the total acreage of the RA as 119.6 acres. This acreage is the sum of the different feature areas of the MRS, which include Upland Brush (15.5 acres), Upland Grass (9.7 acres), West Dune (0.2 acres), East Dune (1.2 acres), Beach (25.2 acres), Long Cove (2.8 acres), Tisbury Great Pond (36.5 acres), and Ocean (28.5 acres). This difference of 3.5 acres consists of several beach parcels. The reduction in RA acreage, which occurred during the DD approval process, was due to the fact that ROEs could not be obtained. The DD was approved, but the RA acreage was not carried out in the DD text. The RA contract was awarded for 119.6 acres.

The DD states “For parcels where ROE is refused, interim LUCs will be implemented on abutting properties where ROE has been obtained, to minimize hazards to the public. The interim LUCs will be maintained until such time as the remedy is fully implemented and UU/UE is achieved on those properties.” As UU/UE cannot be achieve at the MRS and LUCs are becoming permanent, this ESD change removes the need to attempt to get ROE at the remaining beach parcels and complete MEC removal. The MRS acreage does not change.

Difference #2 Item Depth.

Per the 2016 DD, after all clearance operations were complete, a review of the site was to be made to ensure the effectiveness of the remedial actions for UU/UE.

The maximum depth that items were recovered during the RI was 3 feet bgs. Based on these findings, coupled with the limitations of the geophysical equipment to detect items down to a maximum of 3 feet, and the anticipated depth of receptor interaction, the selected remedy of a subsurface remediation of MEC to a depth of 3 feet bgs in upland areas and a depth of 3 feet bbs in inland water and ocean areas was selected. During remedial action activities, the consistent detection depth of the geophysical sensors met these criteria. However, a total of 2 MEC items were recovered at depths greater than 3 feet and many MEC items were encountered at a depth of 3 feet. Since items were recovered below the consistent detection depth, and many were recovered exactly at 3 feet, it cannot be stated with certainty that additional deeper items do not remain. Also, due to the dynamic site conditions resulting in significant ocean and shoreline erosion and accretion, these deeper items could potentially become more shallow or be exposed over time.

Therefore, while the remedial action was successfully implemented in accordance with the selected remedy as stated in the 2016 DD, potential residual risks from MEC remain, necessitating a revision to the RAO and the remedy. The revised RAO is as follows: to reduce the unacceptable probability of MEC encounter at the MRS such that a negligible probability of encounter can be supported for recreational users, landowners, visitors, and workers conducting activities such as boating, fishing, periodic excavation of beach to open the pond to the ocean, and swimming at the MRS from explosive hazards associated with MEC exposure in and below the dunes; during intrusive activities; and due to dune erosion. The remedy is revised from interim LUCs to permanent LUCs. LUC measures include conducting UXO awareness training sessions for TToR and local first responders (police and fire department personnel), distributing explosives safety educational materials messaging the 3Rs of Explosives Safety Education provided by USACE to first responders and to TToR, conducting interviews

with local officials and property owners, obtaining a summary of UXO related activity at the MRS, and inspecting and maintaining UXO hazard awareness signs. Currently, there are four signs, located at the main entrance parking lot, the beach entrance at Summer Beach, the beach entrance at Winter Beach, and at the Western Beach however, the number of signs may change in the future in order to adequately cover additional beach access pathways as they are established.

A LUCIP has been in place since 2019 and will be updated by September 30, 2025. All signs as described in the LUCIP were installed in 2019 and continue to be monitored annually. Training was initiated in 2019 and continues annually. The safety brochures have been delivered.

Because UU/UE was not achieved, Five Year Reviews will continue to be conducted to evaluate the site and to determine if the remedy is protective of human health and the environment.

The approximate cost for annual site inspection, sign maintenance, and educational awareness training is $21,500; the approximate cost for the Five Year Review is $63,675; and the approximate cost for a sign replacement (including mobilization for replacement) is $21,000. The total cost change for a 30 year period is approximately $1,700,000.

5.0 SUPPPORT AGENCY'S COMMENTS ON ESD

The United States Army consulted with MassDEP affording them the opportunity to review and comment on this ESD for TGP site in accordance with 40 CFR § 300.435(c) (2). MassDEP reviewed this ESD and had no regulatory comments. There were no regulatory comments. The MassDEP concurrence will be sought with this ESD and documented in Appendix A.

6.0 STATUTORY DETERMINATIONS

The selected remedy is protective of human health and the environment, complies with Federal and State laws and regulations that are applicable or relevant and appropriate to the remedial action, and is cost effective. The selected remedy utilized permanent solutions to the maximum extent practicable.

7.0 PUBLIC PARTICIPATION AND COMPLANCE

When this ESD for TGP is finalized, a Notice of Availability and a brief description of the ESD will be published in *The Martha's Vineyard Times and Vineyard Gazette*. This ESD will also become part of the AR. These actions will fulfill the public participation and compliance requirements set out in the 40 CFR §300.435(c)(2)(i).

8.0 SIGNATURE

Approved:

AJODAH.RAVI.IAN.1269829466 Digitally signed by AJODAH.RAVI.IAN.1269829466 Date: 2024.12.06 15:11:14 -05'00'

_____ _____

RAVI I. AJODAH, SES
Regional Programs Director
North Atlantic Division

Date

9.0 REFERENCES

GSI Pacific, Inc., 2017, *Final Uniform Federal Policy Quality Assurance Project Plan, Remedial Action, Tisbury Great Pond (Project 01) Munitions Response Site, West Tisbury, Dukes County,Martha's Vineyard, Massachusetts*, *FUDS Property No. D01MA0453,* November.

GSI Pacific, Inc., 2021, *Draft Remedial Action Report, Tisbury Great Pond Munitions Response Site, Martha's Vineyard, Massachusetts,* August.

U.S. Army Corps of Engineers, 2016, *Decision Document, Former Tisbury Great Pond Munitions Response Site, Martha's Vineyard, Massachusetts*, New England District, May.

UXB International, 2014, *Final Remedial Investigation Report, Tisbury Great Pond InvestigationArea, Martha's Vineyard, Massachusetts, FUDS Property No. D01MA0453. 8 August.*

UXB International, Inc., 2015, *Final Feasibility Study Tisbury Great Pond Munitions Response Area, Martha's Vineyard, Massachusetts, FUDS Property No. D01MA0453, June.*

APPENDIX A

Regulatory Concurrence

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
100 Cambridge Street Suite 900 Boston, MA 02114 • 617-292-5500

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

Ms. Marie Esten, Project Manager
Programs/Project Management Division
U.S. Army Corps of Engineers, New England Division
696 Virginia Road
Concord, MA 01742-2751

September 24, 2024

RE: Explanation of Significant Differences
Tisbury Great Pond Munitions Response Site
West Tisbury, Massachusetts
D01MA0453

Dear Ms. Esten,

The Massachusetts Department of Environmental Protection (MassDEP) has reviewed the proposed Explanation of Significant Differences (ESD) prepared by the U.S. Army Corps of Engineers (USACE), dated July 12, 2024, for the Formerly Used Defense Site (FUDS) Tisbury Great Pond (TGP) Munitions Response Site (MRS) Project 01. The primary purposes of the ESD are to: (1) modify Remedial Action Objectives (RAOs) to reflect the fact that Unlimited Use/Unrestricted Exposure (UU/UE) has not been achieved; and (2) modify the existing remedy from interim Land Use Controls (LUCs) to permanent LUCs.

As you are aware, the remedy selected in the May 2016 Decision Document (DD) included subsurface removal of all munition items to a depth of three feet below ground surface (bgs), the geophysical equipment's limit of detection. This remedy included interim LUCs until such time that UU/UE was achieved. However, upon completion of the remedial action and the subsequent Five-Year Review, the determination was made that UU/UE was not met and that the interim LUCs should be made permanent. This determination was made due to several munition items being recovered at or below the three-foot bgs limit of detection. Since items were recovered below the consistent detection depth, and many were recovered exactly at three feet bgs, it cannot be stated with certainty that additional deeper items do not remain. Also, due to the dynamic site conditions resulting in significant ocean and shoreline erosion and accretion, these deeper items could potentially become shallower or be exposed over time.

Since munitions have been recovered below the consistent detection depth, USACE has determined that potential residual risks from munitions and explosives of concern (MEC) remain and an ESD is necessary in order to revise the RAOs and remedy for the Tisbury Great Pond MRS. MassDEP has reviewed the Remedial Investigation Report, Remedial Action Report, Annual Long Term Monitoring (LTM) Reports, and the First Five-Year Review. MassDEP concurs with USACE's decision to revise the RAOs and remedy through the proposed ESD.

If you have any questions concerning this letter, please contact the MassDEP project manager at joanne.dearden@mass.gov.

Sincerely,

Millie Garcia-Serrano, MPH
Assistant Commissioner, Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection

cc: Gerard Martin, SERO Regional Director
John Handrahan, SERO Deputy Regional Director