REVIEW COMMENT

PROJECT: Phase IV Remedial Investigation **LOCATION:** Northeast Cape, St. Lawrence Is., AK

DOCUMENT: Draft Work Plan (S&W 2004)

U.S. ARMY CORPS OF ENGINEERS CEPOA-EN-ES	DATE: 17 June, 2004 REVIEWER: Jeff Brownlee, ADEC PHONE: (907) 269-3053	Response By: Randy Hessong, Shannon & Wilson Field Team Leader; 21 June 2004

Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	Response / Recommended Responder	Correction to Document	Back check by: (Initials)
1.	Section 4.1.2	Please clarify how the field screening locations will be decided.	Accepted / S&W author	Add text: "Field screening samples will be distributed across the area represented in Figure 3, with an emphasis on locations where vegetative distress, soil staining, or other visual clues suggest soil impacts may exist."	
2.	Section 4.3.2 General	Please explain the strategy for boring placement. If obvious contamination is present will the boring be logged for characterization purposes or will there be a step out to try and bound the impacted area?	As discussed in the Review Conference, some adjustment of borings could be made. Because borings along the western edge of the stained area were basically at the edge of the gravel pad, an approach was discussed whereby borings on the eastern portion would be drilled first. If stepping out from the last borehole was deemed necessary to delineate the extent of contamination, this would be done and the borings along the western edge of the staining would be adjusted or dropped, as appropriate.	A statement will added to Section 4.3.2 stating that borings on the eastern portion would be drilled first. If stepping out from the previous borehole is deemed necessary to better assess the extent of contamination, this will be done and the borings along the western edge of the staining will be adjusted or dropped, as appropriate.	
3.	Section 4.4.2, 4.8.2 All PCB sample areas	Please discuss the use of immunoassay screening kits for PCB sample locations. Collecting a limited number of samples may not adequately delineate clean/impacted boundaries.	The SOW originally called for immunoassay screening at 10 locations to select 6 laboratory samples at Site 7. The combined cost of the test kits and laboratory analysis significantly exceeded the cost submitting all 10 samples to the laboratory for analysis. – Screening is not in SOW for other PCB sample areas / USACE – The PCB sampling is targeted towards		

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			refining areas for remedial design purposes, additional confirmation sampling will still be needed during any soil removal activities.		
4.	Section 4.6.2	See comment 2.	The SOW calls for drilling in 2 specified locations. / USACE – The primary purpose of the soil borings is to delineate total depth of contamination for remedial design purposes.		
5(a).	Section 4.9.2	Last paragraph: Please specify that (analytical) samples will be collected even if below the water table.	Accepted / S&W author. As discussed in the Review Conference, the concern is that soil collected from or below the groundwater smear zone often has low headspace readings, but analytical data from that area can be important.	Alter text to note that the sampling goal is to determine the limits if contaminants, and analytic sample selection will take more than headspace results into account.	
5(b).	Section 4.9.2	Please sample all ten of the wells installed in 2001 if they are viable. The data is useful for trend analysis and contributes a data point to the regulatory criteria of four (seasonal at most sites) sample events for a contaminated site groundwater characterization	Based on Task Order 006, Modification 1, all 10 of the wells installed in 2002 (MW 88-1 through MW 88-10) will be sampled.	Section 4.9.2 and related sections will be revised to reflect the change in scope.	
6.	Figure 9	Please indicate the previous sample locations that are over the cleanup criteria of 1mg/kg. Please indicate where excavations have taken place and their approximate boundaries.	Accepted, we understand one of the maps developed and provided to us by the USACE contains this information in a digital layer.	Figure 9 will be revised to incorporate the requested information.	
7.	General	It would provide valuable data to sample all the viable wells and well points at the sites at the Cape. We can use the trend analysis information in the feasibility study.	Not in SOW / USACE - Sampling all existing monitoring wells and well points is beyond the scope of this investigation and would nearly double the level of effort in the field. However, sampling of the 10 MWs installed in 2002 at the Main Complex has been added.		