

SUBJECT: NORTHEAST CAPE, ST. LAWRENCE ISLAND
REVIEW COMMENTS MEETING MINUTES
January 23, 1995
(Responses to Comments are shown in italics)

Present:

Doug Blaisdale, COE
Kerry Walker, COE
Andy Ferguson, COE
Suzanne Beauchamp, COE
Doug Quist, MW
Bonnie McLean, MW
Randy Romanesko, ADEC, Nome, Alaska

1300

Introductions

Review written comments:

Kerry Walker -
See written responses
Additional comments:

- Ref. #7 MW to check paint on all tanks at NEC which might be cut up during remediation. Take core lead paint sample.
- Ref. #8 Does HAZCAT allow for removal of waste?
 MW - No, only allows for bulking of like product.
- Did we flag containers?
 MW - No, did mark vessels with vol. lines.
- Why did MW do HAZCAT and not NW?
 MW - MW was in SOW - we do not know NW responsibility to materials found - any potential dangerous materials found by MW were reported to COE rep. on site, Ron Broils, i.e., DS-2 and STP found in building.
- Ref. #17/22 What should disposal areas reg. be?
 MW & Kerry - Fed Regs RCRA Subtitle D are more stringent than ADEC draft which allows for Class III SW disposal areas. Kerry reluctant to go with draft ADEC, since it is draft.
- Ref. #19 Eliminate "Estimated" vs. "Potential" references.
 MW will use "Potential."
- Ref. #25b W

Ref. #29 W

Ref. #32 "Biogenic in nature"
MW will add to text.

Comments: written review from Andrew Ferguson

Ref. #11 Clarify why E&E stated not DERP elig.
Remove all references to DERP/FUDS
ineligibility to belay future confusion.

Ref. #16/20 Transformers were all to be removed by NW in 1994 -
Doug wants MW to remove or ghost all fig. reference
to transformers.
MW - We are not sure all were removed - would
need written verification from Doug (per NW
conversation) before MW can state info.

Comments: Verbal

Suzanne

1 Pg. 4-4, Section 4.1.5 and Table 4-1, action levels
not addressed in text.
MW will add.

2 Ppg. 3-8, 3-9, ref:
a: "COE" as owner. Request change to "NEC."
MW changed to NEC.
b: MW to change "Superfund" to "CERCLA."
MW changed "Superfund" to "CERCLA."

Committee discussion of:

One supersack with lead = 159 mg/kg. Kerry wants to know why
we use 100 mg/kg as action level when residential levels can
be 400 mg/kg.

MW - Bag in question involves 14.1" of tailings ~40 gal.,
<1 drum from MW16-3, pg. 4-85 placed near Paint Dope
Bldg.

Discussion back and forth on supersack = container.

MW assured ADEC materials remain at point of origin.

Conclusion per Randy Romanesko, ADEC, Nome, Alaska: Bag 16-3
shall remain on site as is until remediation action is
complete. DRO contaminated soil in supersack, handled for
"DRO" as "containers," can remain until remediation action is
completed.

End NEC discussions.

Minutes submitted by B. McClean, Montgomery Watson.

/dw

**SUBJECT: COMMENTS ON DRAFT REMEDIAL INVESTIGATION REPORT,
NORTHEAST CAPE, ST. LAWRENCE ISLAND,
DATED DECEMBER, 1994
FROM: KERRY WALKER, EN-EE-TE**

(Responses to Comments are shown in italics)

1. The Summary Table of Remediation Alternatives beginning on page 5-4 is excellent and summarizes the entire Release Investigation very effectively. Place a copy of it in the Executive Summary as it provides a lot of information in a comprehensible format for the quick review by the managers.

Accepted: Added Table 5-4 to the end of Executive Summary.

2. In general the report was well organized and quite readable. The specific comments are fairly minor.

Accepted

3. Page 1-9, Figure 1-2. This map is good. An additional map needs to be added showing the distance to the nearest village/ town with a population base.

Withdrawn: Figure 1-1 provides this already.

4. Page 2-3, top line: Add units to the number "150".

Accepted: Page 2-3, added "feet" after 150.

5. Page 2-7, Section 2.1.18 Site 18: Housing Facilities and Squad Headquarters: This description does not match up with the area shown as Site 18 on Figure 2-8. I believe that the numbers 18 and 20 are swapped on the figure. Coordinate.

Accepted: Figure 2-8, page 2-31, correction made to reflect true site locations.

6. Page 2-8, Section 2.1.21 Site 21: Wastewater Treatment Facility: This section discusses "two side-by-side settling tanks": If location is known please add them to Figure 2-9.

Accepted: Section 2.1.21, page 2-8, added reference to septic tanks shown on Figure 2-9.

7. Page 2-18, Section 2.2.13 Lead-Based Paint Sampling: This section cites the reason for sampling lead chips as Guidelines in HUD, 1990. This implies to me there are plans for the housing to be occupied and we are trying to determine whether the lead- base paint needs to be removed prior to occupation. Clarify the reason behind the chip samples. If the intent is to demolish the buildings

then TCLP cores would be required representing the building if we were planning to landfill the debris. Clarify intent of sampling.

Accepted: Section 2.2.13, page 2-18, added reference to need of TCLP core sample if demolition of buildings is deemed necessary.

8. Page 2-18, Section 2.2.14 HAZCAT SAMPLING: Clarify in this section the intent of the HAZCAT Sampling. What use is the data for future action? Is the intent that we are going to 'bulk' all of the liquids from the site and we wanted to know if they are compatible for bulking? Is the intent that we are to transport all the liquid waste off-site? If so, HAZCAT sampling will not be sufficient for waste profile analysis for manifesting. Clarify the purpose of the testing performed. Tests seem to indicate some of the liquids may be water. Do we have enough information to be able to run this water out onto the ground. If not, what else do we need?

Accepted: Section 2.2.15, page 2-18, added reference to rationale behind sampling.

9. Page 2-24, Figure 2-1: This is an excellent figure. Add a legend of site names with numbers just above the north arrow.

Accepted: Figure 2-1, added legend of site names.

10. Page 2-34, Figure 2-11, Site 22 Location Map. This map shows 4 water storage tanks. Add well locations as well.

Accepted: Figure 2-12, added well locations.

11. Page 4-4, last paragraph. I agree with the conclusion stated!

Accepted.

12. Page 4-8, top of page section "Metals". Good analysis!

Accepted.

13. Page 4-8, section titled "PCBs". Good analysis!

Accepted.

14. Page 4-8, last sentence states "Five of the seven areas were below the ADEC action levels ..." This does not jive with Figure 4-3 which shows all 7 areas as areas of concern. Coordinate.

Accepted: Section 4.2.6, page 4-8, added reference to all seven areas of concern.

15. Page 4-10, Figure 4-3. In this figure and others there are 2 legend items: one states "Potential extent of POL contamination above benchmark" and shows shading surrounded with dashed lines;

the other one states "Estimated extent of POL contamination above benchmark criteria" and shows shading surrounded with solid line. The difference between these 2 items is not clear to me. Please clarify in text or redo legends.

Accepted: Entire text and figures, all reference to Estimated deleted.

16. Page 4-14, top section titled "Dioxins". Good analysis! Add the calculations that were performed as an appendix.

Accepted: Calculations added in G tables.

17. Page 4-16, Section 4.3.6 Remedial Options. Under section titled "Soils" there is discussion of cleaning up the site to ADEC matrix for petroleum contamination. This site is a landfill and should be looked at as closing it under landfill regs not oil contamination regs. Discuss at review conference and clarify in text.

Accepted at conference: Change reference to cleanup levels to appropriate 18AAC60.

Later, in conference with Brett Jokela, Montgomery Watson, Anchorage Solid Waste Management, Professional Supervising Engineer, ADEC Solid Waste regulations 18AAC60 only apply to areas used as landfills that were permitted by ADEC.

Phone call to Chris McCumby, ADEC, Fairbanks, Alaska. No record of permitting found for NEC area. Since no landfill permit was issued, no obligation to clean up under ADEC 18AAC60 regulations exists.

Spoke with Kerry on Feb. 3, 1995. Agreed to "W."

18. Page 4-19, Figure 4-4-3, Site 6 Sampling Locations. This figure is excellent! I like the display by depth of the contaminants.

Accepted.

19. Page 4-19, Figure 4-4-3. Add inset with cross-section of contamination plume on this figure and all other figures showing plan views of plumes.

Withdrawn: Cross sections and axis of section view provided.

20. Page 4-20 Figure 4-5-1. Great figure! I like the numbering system used to differentiate which boreholes and monitoring wells were at each site.

Accepted.

21. Page 4-22, Figure 4-5-3. Fix the number "293,00" (sic) at SW/SD 101. Elsewise, great way of presenting the data!

Accepted: Figure 4-5-3, page 4-22, added 0 to yield 293,000.

22. Page 4-33, only paragraph. Again this paragraph discusses cleanup of a landfill using Oil Pollution Regs. See comment #17. Clarify.

See #17.

23. Page 4-35. There are 2 pages with this number. Coordinate.

Accepted: Entire text, coordinate all page numbers.

24. Page 4-48, Figure 4-7-3. Good display of table with analytical results on this figure.

Accepted.

25a. Page 4-48, Figure 4-7-3. The legend states that the shaded area is POL above the benchmark criteria. State this level in PPM on every figure it is used (i.e. add to legend item).

Accepted: All appropriate figures, list benchmark criteria in legend.

25b. Page 4-61, Section titled: "Groundwater". Need an overview crosssection figure of the plume in areas 13, 15, 19, 27, and 22.

Withdrawn: Provided.

26. Page 4-64, Figure 4-8-2. Coordinate this figure with Figure 4.8.3. Figure 4.8.3 shows contamination at MW 19-2. This figure shows no contamination.

Accepted: Figure 4.8.3 shows contamination level in MW 19-2.

27. Page 4-65, Figure 4-8-3. Coordinate with text on page 4-58. Text says 58,000 ug/kg Aroclor 1260 at SS 145. This figure says its at BH 13-3 4-6'. Also, Data table on this figure is missing SW/SD 107 shown in plan view on this figure. In legend direct reader to Figure 4-7-4 for this data.

Accepted: Figure 4-8-3, changed table to reflect values as SS 145.

28. Page 4-78, Section titled Soils, Surface Water and Sediment. Coordinate "Area 21-a..." (sic) with Figure 4-9-2 which has an area called "21-A". No I'm not being nitpicky, I'm being rigorous.

Accepted: Section 4.7.6, page 4-78, changed 21-a to 21-A.

29. Page 4-95, Section 4.9.3 discusses an UST found during GPR profiling. Add UST on Figure 4-11.

Withdrawn: UST already on Figure 4-11.

30. Page 4-96. Last paragraph says the floor is stained. Coordinate with Figure 4-11 which shows that it is soil contamination at DRO levels of 2640 PPM. Clarify and coordinate whether the sampling was of the floor of the soil outside the building.

Accepted: Section 4.9.4, page 4-96, clarify that the floors inside the buildings are soil.

31. Page 4-97, last paragraph. Same as comment #30. It appears floor and soil samples are not coordinated.

Accepted: Section 4.9.4, page 4-96, clarify that the floors inside the buildings are soil.

32. Page 4-101, top paragraph. Was all data reviewed for biogenic potential? If so, add section to appendices with results and a table showing which hits on all sites were potentially biogenic.

Accepted: Add appendix section for biogenic results.

33. Page 4-112, top paragraph. Good field work on finding appropriate background information! Interesting that there appears to be dioxin in the background water samples, as well as DRO and TRPH.

Accepted: Flag data as blank and lab contamination in text.

34. Page 5-4. Excellent table! Complete column information even if its with a code explaining why it's unknown. Also add a column referring to appropriate figure to show the site.

Accepted: Added reference to appropriate figure beneath each area of concern.

I enjoyed reviewing this report.
If you have any questions please call.

Kerry Walker
753-5725
x1725

**REVIEW
COMMENTS**

PROJECT: Remedial Investigation
DOCUMENT: Northeast Cape, St Lawrence Island, Alaska

<p>U.S. ARMY CORPS OF ENGINEERS CENPA-EN- EE-TE</p>		<p>DATE: 17 Jan 1994 REVIEWER: Andrew Ferguson PHONE: 753-5725</p>	<p>Action taken on comment by: _____</p>		
<p>Item No.</p>	<p>Page No. Para No.</p>	<p>COMMENTS</p>	<p>REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)</p>	<p>DESIGN OFFICE C - correction made (if not, explain)</p>	<p>Back check by: (Initial s)</p>
<p>1</p>	<p>p. i</p>	<p>Excellent job in organizing Table of Contents especially section 4. By combining site locations with site conditions (geology, hydrology, geophysical survey, nature & extent of contamination, fate & transport, and remedial options), continuity is maintained considering the numerous (24) investigative site locations.</p>	<p>A</p>		
<p>2</p>	<p>p. E-1 Listing of sites</p>	<p>Include sites 1, 8, 12, and 26 in listing of sites and state 'ineligible for DERP cleanup'</p>	<p>A - Sites added.</p>		
<p>3</p>	<p>p. E-3 Fig ES-1</p>	<p>Include sites 1,8,12, and 26. There are two site 23 areas--suggest labeling them 23(a) and 23(b). List Background as reference in text: Site 00 (a) and Site 00 (b)</p>	<p>A - Sites added.</p>		
<p>4</p>	<p>p. E-5 Fig ES-2</p>	<p>Include additional arrow or comment for description of lower left photo</p>	<p>W - Provided.</p>		
<p>5</p>	<p>p. 1-6 1.3.7.1 Last sentence</p>	<p>Change area to 'areas' followed by comma.</p>	<p>A - Changed to plural form.</p>		

6	p. 2-1 2.1.1	Is the Burn site locations at Site 1 easily identifiable? No concern for dioxins/furans were mentioned during the 1993 E&E report?	No indication was observed during the 1994 RI. NO distressed vegetation was noted at that time.		
7	p. 2-3 2.1.7 Under objective	The first paragraph indicates a concern over dioxins and furans at site 7 and tests were performed to determine their presence. State additional objective such as 'Determine the absence or presence of dioxins and furans.'	A - Added bullet pertaining to dioxins and furans.		
8	p. 2-4	What source suggested an actual spill occurred at site 8? What was the suggested volume of the spill and when did it occur?	A - Added sentence stating unknown source.		
9	p. 2-4 2.1.9, first sentence	State the year when construction began at the base (1952) within the first sentence.	A - Added year.		
10	p. 2-5 2.1.11, 4th sentence	State year, if known, for fuel spill (180,000 gallons) during snow removal operations. Late sixties--I'm assuming 1968 or 1969.	W - Year not known.		
11	p. 2-5 2.1.12	Are there any gasoline tanks that remain at Site 12: Gasoline Tank Area? If so, state the number and size of tanks. If not, state that no gasoline tanks remain.	A - Added statement correlating size and disposition of tanks.		
12	p. 2-6 2.1.15 2nd sentence	State when break in fuel line occurred which resulted in 40,000 gallon diesel fuel spill.	A - Added statement regarding unknown date of rupture.		
13	p. 2-9 2.1.22	2nd objective from top of page 2-9. change 'of' to 'or'	A - Changed "of" to "or".		

14	p. 2-9 2.1.23	As mentioned above, suggest relabeling site 23 into 23(a) and 23(b).	A - Changed to 23(a) and 23(b).		
15	p. 2-15 2.2.7 2nd par, 12th sentence	Water levels rose in completed wells to a higher elevation than noted during drilling. Good explanation. Is there any way to predict when this may occur (artesian conditions/melted frozen pore water)?	W - There isn't a way to anticipate these conditions in an area of unfamiliar hydrogeological conditions. Pg. 2-16.		
16	p. 2-25 Fig 2-2	Are there transformers within the transformer shed at site 2? If so, Insert location of transformers. If no transformers, state so in section 2.1.2.	A - Transformer locations added.		
17	p. 2-26 Fig 2-3	Are the abandoned vehicles at site 4 of military origin? If so, state in section 2.1.4.	W		
18	p. 2-27 Fig 2-4	Insert location of empty 500 gallon (4'x6') storage tank at site 6.	A - Added location to figure.		
19	p. 2-31 Fig 2-8	Insert fuel line (estimated or actual) at site 15. Insert grease pit location at site 19.	A - Added fuel line and grease pit.		
20	p. 2-32 Fig 2-9	Insert transformer locations at site 14.	A - Added Transformer locations.		
21	p. 2-33 Fig 2-10	Insert location of leaking drum at site 17.	W - Present.		
22	p. 2-43 Table 2-3	Useful explanation of 'Field Activities' for lay person.	A		

23	p. 2-45	IDW results recommend disposal action for those results exceeding ADEC level A. Why not treat similar results from MW 21-1 (spread soil at site, dispose of bag at landfill) for MW 10-1, BH 11-1, MW 19-2, MW 13-1, BH 7-3, 7-4, MW 7-4, etc? IF appropriate, change 'recommended disposal actions' in Table 2-5.	A - Table 2-5 suggested action for 21-1 to transport to landfill.		
24	p. 3-7, 3.1.4	Good explanation of Dioxins and Furans	A		
25	p. 3-10 3.3	Under Soil benchmark criteria references, 3rd bullet. Most current 'Risk Based Concentration Table' from Region III has a Nov 1994 date. Change to reflect current reference and RBCs if appropriate.	A - Global change for RBC table to Nov. 1994.		
26	p. 3-11 3.3	Under surface and groundwater, change reference for 4th bullet as mentioned above.	A - Global change for RBC table to Nov. 1994.		
27	p. 3-11 3.4	Good discussion on Remediation Options.	A		
28	p. 3-19 Table 3-1	In section 3.1.4 (3rd paragraph), the text mentions that TEQ factors have been developed with respect to 30 compounds. However, Table 3-1 shows TEQ factors for only 25 isomers. Change if appropriate.	A - Removed reference to 30 compounds in Section 3.1.4. Page 3-7.		
29	p.4-1, Section	Logical grouping of site locations.	A		
30	p. 4-1 4.1	Move 4.1 to page 4-3 to improve flow of reading.	A - Changed.		
31	p. 4-8 4.2.4	Last sentence under Metals. change 'within benchmark' to 'below benchmark'	A - Changed.		

32	p. 4-12 4.3.2	2nd paragraph, 2nd to last sentence. State depth below ground surface where groundwater was encountered.	A - BGS (after development) 9.25' added to 4.3.2.		
33	p. 4-19 Fig 4-4-3	Show results from SW/SD 103 (PCBs).	A - Results added for SW/SD103 on Figure 4-5-1.		
34	p.4-35 Fig 4-6-3	Is it justified in connecting the POL plume from MW 9-1 down to SS141 and SS 138? How do you determine what is 'estimated' vs. 'potential' extent of POL contamination above benchmark criteria?	A - Deleted reference to "Estimated," yes it is justified by field observations.		
35	p. 4-40 4.5.3	Any clue where these 29,500 buried drums are located? They were not found at site 10 using GPR. What description was provided in the 1993 E&E report.	W - Location not known.		
36	p. 4-48 Fig 4-7-3	Assuming the A after 10/11A stands for Basin A. Define this in the text (section 4.5)	A - 4-1.		
37	p. 4-58 4.6.3	Did GPR detect any underground piping? State whether GPR detected underground piping or did not detect underground piping.	A - Added reference to detected underground piping.		
38	p. 4-60 4.6.4	Under HAZCAT Sampling Section 2.1.13 states that site 13 has a 20,000 gallon UST but this text states 22,000 gallon UST. Correct the one in error. Was the unknown UST at site 13 the one located within the concrete vault? What are the dimensions of this tank?	A - Corrected to 20,000. Yes it is the one in the concrete vault and the dimensions are not known.		

39	p. 4-73 Table 4-6	The key for 'Analytical Results Detected Above Benchmark Criteria' tables throughout section 4 does not have explanations of qualifier codes (BL, J, Jo, Ju). Correct all table keys in section 4. I did see these terms defined in Figure 2-16, p. 2-39 but most folks will not know to reference the Data Qualifier Flow Diagram.	A - All tables to include index to qualifiers in the key.		
40	p. 4-77 4.7.4	Under HAZCAT Sampling Missing zero in mentioning 5,000 gallon AST. Correct.	A - Added missing zero.		
41	p. 4-80 Fig 4-9-2	Is it justified in connection MW 21-3 and SS 167 to MW 21-1, MW 21-2 and SS 168 data to form potential extent of POL contaminated plum? If not appropriate, correct plum boundaries.	A - It is appropriate from field observations and lab data.		
42	p. 4-86 4.8.4	Under PCBs Mention values for SS163 in text to be consistent with previous section descriptions of PCB contaminated areas.	A - Values mentioned.		
43	p. 4-88 4.8.6	No BNA guidelines for contaminant benchmark criteria?	A - Section 4.0 delineate use of criteria when there is none.		
44	p. 4-97	Prior to 4.9.5 insert section on HAZCAT Sampling if any performed on UST (4'x6') located 5 feet south of the pumphouse.	A - Added section regarding HAZCAT. Pg. 4-96.		

45	p. 4-123 4.13.1	Were chip or core samples taken for the TCLP analysis?	A - Chip samples only. Need for TCLP if building demolition necessary explained in Section 2.2.13. "Chip" added to 4.13.1. Pg. 4-123.		
46	p. 5-3 5.5	Graphically estimate where current drinking water sources are located.	A - Added reference to Figure 1-4.		
47	p. 5-8 Table 5-1	Add calculated volume for site 21/A (PCBs)	A - Calculated.		
48		Overall, a well presented RI covering an assortment of site locations.	A		
49	Volume II App. E	Include calculated ADEC Matrix Score Sheets for all 24 site locations. Possibly group site locations as presented in Section 4.0.	A - Inserted.		
50		Add section discussing USTs, ASTs, and transformers that remain on NE Cape. A table listing site location, USTs, ASTs, and transformers would provide an effective summary. (Similar to Long Island section 6.2.9, p. 6-11). Insert at the end of section 4 or in section 5.	A - Added at the end of Section 5 as Table 5.1. Old 5.1 is now 5.2.		

**SUBJECT: COMMENTS ON DRAFT REMEDIAL INVESTIGATION REPORT,
NORTHEAST CAPE, ST. LAWRENCE ISLAND
VERBAL COMMENTS MADE BY SUSAN BEAUCHAMP AT THE REVIEW CONFERENCE:**

(Responses to Comments are shown in italics)

1. Section 3.2, page 3-8, first line change "COE" to "NEC."

Accepted: Changed.

2. Section 3.2.1, page 3-8, first line change "Superfund" to "CERCLA."

Accepted: Changed.

3. Section 4.1.5, address DRO in soils above benchmark criteria accordingly.

Accepted: Clarified reference to ADEC Matrix and referenced Appendix E calculations for dismissal from further investigation and remediation.