

**- REVIEW
COMMENTS**

**PROJECT: Focused Remedial Investigation Former Yakutat Air Force Base
DOCUMENT: Draft Work Plan May 2004**

U.S. ARMY CORPS OF ENGINEERS CEPOA-EN-EE-TE		DATE: 6/3/2004 REVIEWER: Deb Caillouet PHONE: (907) 269-0298	Action taken on comment by:		
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)

1	1.3, 2 nd paragraph	Please correct the reference to Alaska Department of Environmental Conservation (DEC) cleanup standards. Method 2 is for soil and is found in 18 AAC 75.341. The groundwater standards are in 18 AAC 75.345 Table C.			
2	1.3 and general	DEC has not established screening level criteria for dioxins. The discussion referenced in the FSP is specific to the Haines-Fairbanks Pipeline investigation and can not be applied to another site without a site specific risk assessment. (18 AAC 75.341, Note 8, Tables B1 and B2). The Culture Camp area at Yakutat has subsistence usage that is significantly different from the Haines-Fairbanks Pipeline and the potential overland transport of contaminants into surface water or sediments must be considered. Throughout the document this should be corrected.			
3	4.1 (7.)	The frequency of analysis for PAH's and lead should be included in this paragraph.			
4	4.3.2	Analytica Alaska does not analyze for dioxins. Please provide the laboratory they will subcontract to.			
5	6.3.7	The survey data should be used to show groundwater elevations referenced to a standard, such as mean sea level, to allow meaningful interpretation of the data.			
6	6.3.8	DEC guidance found at http://www.state.ak.us/dec/spar/csp/guidance/decom.pdf states in 4.5(4) "All permanent monitoring wells should be installed with an annular space seal that has a permeability of 1 x 10 ⁻⁷ centimeters per second or less." It then goes on to describe the acceptable materials. The drill cuttings are			

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		not to be used as well packing material. Please correct well construction throughout the work plan to comply with the guidance.			
7	7.1.5.1	The Toxicological Profile for Chlorinated Dibenzo-p-Dioxins (ATSDR 1998) in Chapter 5, Potential for Human Exposure, cites several studies indicating that the bioaccumulation in plants is insignificant. In general dioxins detected have been associated with atmospheric deposition on the plant surfaces. Please correct the potential exposure pathways to reflect this throughout the conceptual site model (Figure 8) and descriptions. The off-site receptors should include the ingestion of shellfish harvested from the slough that contain dioxins.			
8	7.1.5.2	The first bullet item, direct uptake and dermal contact by plants should be removed as an ecological exposure pathway.			
9	Figure 7	If there are any well logs available from the installation of the city drinking water wells (or any others in the area) they should be referenced and included here to support the model.			

APPENDIX A 1 FIELD SAMPLING PLAN

11	3.3.1	The groundwater cleanup levels in 18 AAC 75.345 Table C should not be referred to as MCLs as they are not all derived from MCLs.			
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12	3.3.2	The source of the TEFs that will be used should be included here. DEC recommends using http://www.who.int/pes/docs/dioxin-exec-sum/exe-sum-final.html Please remove the reference to DEC screening levels.			
13	5.1.2	Samples for TOC are to be taken in areas that are similar to those that are contaminated (depth, soil structure) as stated but also should be taken from non-contaminated areas. Please be more specific on how the samples for TOC analysis will be chosen.			
14	5.2.1	If the aerial photograph mentioned in this paragraph is the one I pointed out to the Corp, it was found in the 1970's section of the Admin Record, Volume 4.			
15	10.0 and all other reference sections	Please list the references in alphabetic order.			

APPENDIX B WASTE MANAGEMENT PLAN

17	3.1.1	Drill cuttings should not be used as annular packing.			
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