

John Stone

From: Meade.Chris@epamail.epa.gov
Sent: Monday, November 10, 2008 1:01 PM
To: Dick Somerville; Jack Q. Word
Cc: Andrew Schicht; Brenda Krauss; Bret Walters ; Carrie Bohan (Carrie.bohan@alaska.gov); Claire Batac; Deborah Rudis; Gary Gillette; John Leeds ; John Stone; Meg Pinza; Richard Jackson; Berry.Walter@epamail.epa.gov; William Ashton ; Richard Heffern
Subject: Re: Douglas Harbor SAP
Attachments: Gastineau Channel Metals.pdf; Douglas Harbor SAP October 21, 2008.pdf



Gastineau Channel Douglas Harbor SAP
Metals.pdf (... October 21,...

Dear Mr. Somerville and Mr. Word:

Thank you for addressing EPA's comments on the Draft Sampling and Analysis Plan (SAP). The revised SAP generally appears to be consistent with the Inland Testing Manual (ITM), with a few exceptions as noted below. EPA conditionally concurs with the revised SAP, subject to the following conditions and comments:

Signature Page: Delete the signature block for EPA. Insert an agency distribution list and add "Chris Meade, Environmental Scientist, EPA Region 10" to that list.

Reference Sediment Sampling (pages 5 and 9): EPA does not concur with the proposed reference area shown in Figure 4 on page 7 of the revised SAP for the following reasons. First, given the bathymetry, geomorphology and size of the proposed disposal site, the weight of the evidence suggests that the site is homogeneous (i.e., there is no evidence that the site is heterogeneous). Thus, the appropriate reference sediment sampling approach is the "Reference Point Approach," not the "Reference Area Approach" (see ITM, Section 3.2.1 Reference Sediment Sampling). Second, previous sediment sampling in Gastineau Channel has found elevated levels of mercury near the mouth of Sheep Creek (see Figure 1 and Table 3 in attachment below). Therefore, EPA recommends: using the Reference Point Approach (i.e., one sediment sample collected from a representative reference point); and that the SAP specify the reference point as "Station J1, the Dupont station," as described on page 6 of the attachment below.

Section 2.1 and Figure 6 (pages 9-11): Briefly describe the rationale for delineating Dredged Material Management Units (DMMU) 1, 2 and 4.

Section 5.4 (pages 22-23): Clarify that the acclimation test will include the Douglas Harbor sediment samples and the reference sediment sample. Also, clarify that using ammonia as a surrogate does not limit the scope of the acclimation test to ammonia toxicity; rather, the acclimation test is intended to address several potential contributing factors to toxicity (e.g., ammonia toxicity, sulfide toxicity, etc.).

Performance Criteria (pages 30-31): EPA does not concur with the performance criteria as stated in the revised SAP because the SAP criteria are inconsistent with the ITM criteria. Incorporate the ITM criteria by reference in the SAP, or alternatively, include the ITM criteria in the SAP verbatim. See Sections 6.1, 6.2 and 6.3 of the ITM.

Sincerely,

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Attachment:
(See attached file: Gastineau Channel Metals.pdf)

Dick Somerville
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10/21/2008 02:57
PM

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cc

Subject

Douglas Harbor SAP

All:

The CBJ, PND and Newfields have addressed agency review comments on the Draft SAP (August 2008) for proposed dredging and disposal activities at Douglas Harbor. The attached SAP/QAPP (October 2008) has been updated to address agency concerns and comments. We are planning another work session on November 5, 2008, 10 AM at PND Office, 9360 Glacier Highway, Juneau, 586-2093. Dr. Jack Word from Newfields will be attending this session to address any final comments. As suggested, we have included signature lines for agency sign off on this document before field sampling commences. We are hoping to receive the signatures at or in advance of the meeting. We plan to conduct field sampling either the week of November 10th or November 17th depending on the final comments received at this meeting. It is desirable to conduct sediment sampling as soon

as possible to avoid inclement weather conditions in Gastineau Channel.

Thank you in advance for reviewing the update SAP over the next two weeks and we look forward to your attendance on November 5th. Let us know if you are unable to attend but wish to teleconference into the meeting and we will make those arrangements.

Dick Somerville, P.E. | Vice President

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