

John Stone

From: Ashton, William S (DEC) [william.ashton@alaska.gov]
Sent: Thursday, November 13, 2008 3:20 PM
To: Dick Somerville; Jack Q. Word
Cc: Bohan, Carrie D (DNR); Batac, Claire C (DNR); deborah_rudis@fws.gov; Meg Pinza; Walter Berry; Chris Meade; Bret Walters; Andrew Schicht; Richard Jackson; John Leeds; Gary Gillette; John Stone; Heffern, Richard K (DEC)
Subject: RE: Douglas Harbor SAP

Dear Mr. Somerville and Mr. Word:

ADEC conditionally approves proceeding with sample collection of the Douglas Harbor sediment samples provided (a) the reference sample location is amended as per EPA's comments (Email from Chris Meade 11/10/2008), (b) the Sampling and Analysis Plan (SAP) is revised and approved prior to testing and (c) subject to the following comments:

1. In the revised SAP please include a discussion of how test data will be evaluated and the testing criteria to be used to validate project findings. Please characterize in terms of the criteria for both the Inland Testing Manual (ITM) and the Dredged Material Evaluation and Disposal Procedures (User's Manual) July 2008 (DMMP).
2. In the ITM, the standard test duration is 28 days. ADEC believes this test duration may be insufficient to fully allow for potential mercury toxicity to express itself and suggests a minimum 45 day testing protocol. In the revised SAP please provide discussion of limitations of the testing method on fully describing the potential mercury toxicity.
3. For the Tier IV testing provide a detailed description of the process and criteria NewFields/CBJ will use to evaluate the test results in the draft report.
4. Fish consumption in Alaska is much greater than the fish consumption rates used to develop the FDA action levels for mercury. The SAP needs to include a brief discussion of the differences in fish consumption rates and how this affects the use of the FDA mercury in fish tissue action level for use in Alaska and subsequent interpretation of the project's Hg in tissue results.
5. Provide an electronic or paper copy of the referenced AVS/SEM method.
6. Please revise Sections 7.9 to 7.12 of SAP to state that an internal systems audit will be performed by the lead contractor's QA/QC officer to ensure all SAP guidelines and requirements are being met by the project participants (including contract and subcontracted labs). Results of systems and performance audits will be provided to ADEC's QA Officer and Project Manager and included as attachments in the final report. Performance audit criteria (analytical method, number of blind samples, frequency, range (e.g. representative of expected sample measurement range), acceptance criteria, etc.) needs to be included in the revised SAP and should mirror stated QC criteria for data validation.
7. In the revised SAP include a copy of the distribution list in table format for all major project participants (e.g. contract lab, sub-contract lab, lead sampling personnel, agencies/personnel involved in approval process). Table should include person's name, title, affiliation, phone number and email address.
8. In the revised SAP include a signatory approval page. Include person's name, title, affiliation and place for dated signature for the applicant, lead contractor and agencies providing regulatory approval.

Thanks.

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From: Dick Somerville [mailto:DSomerville@pndengineers.com]

Sent: Tuesday, October 21, 2008 2:57 PM

To: John Stone; Gary Gillette; Andrew Schicht; John Leeds; Richard Jackson; Bret Walters; Chris Meade; Walter Berry; Meg Pinza; Jack Q. Word; deborah_rudis@fws.gov; Krauss, Brenda K (DEC); Ashton, William S (DEC); Batac, Claire C (DNR); Bohan, Carrie D (DNR)

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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