



U.S. Army Corps of Engineers
Alaska District

Final Proposed Plan Building A-711 HTRW Kodiak Navy/Army Formerly Used Defense Site

Kodiak, Alaska
FUDS Project No. F10AK1007-04

July 2023

INTRODUCTION

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The United States (U.S.) Army Corps of Engineers (USACE) requests your comments on this Proposed Plan at the Building A-711 site located in the Kodiak Borough on Kodiak Island, Alaska.

The Proposed Plan was prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and follows the requirements from Engineer Regulation (ER) 200-3-1, Formerly Used Defense Sites (FUDS) Program Policy (USACE, 2020), and U.S. Environmental Protection Agency (USEPA) guidance. The Proposed Plan is a document that USACE is required to issue to fulfill the public participation requirements of Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), also known as Superfund [42 U.S. Code (U.S.C.) § 9601 et

seq.]. The site described in this Proposed Plan is a CERCLA site; however, it is not listed on the National Priority List. The A-711 site is also managed by Coast Guard Base Kodiak under a Resource Conservation and Recovery Act (RCRA) Permit.

The Department of Defense (DoD) is authorized to carry out a program of environmental restoration at former military sites under the Defense Environmental Restoration Program (DERP), which includes clean-up efforts at FUDS. FUDS are properties that were under the jurisdiction of the DoD and owned by, leased to, or otherwise possessed by the U.S. that were transferred from DoD control prior to 17 October 1986. FUDS properties range from privately owned lands to state or Federal lands such as national parks as well as residential land, schools, and industrial areas. The FUDS program includes former U.S. Army, Navy, Marine, Air Force, and other defense-used properties. Over 500 FUDS have been identified in Alaska.

The contaminants of concern (COCs) at the Building A-711 site that are DoD-related have been determined to be derived from petroleum, oil, and lubricants (POL) and are exempt from remedial action under CERCLA Section 101.

Continued investigation and cleanup of the POL contamination at the site is being addressed under a separate project, A711 POL, under the authority of the DERP, U.S.C. Title 10, Section 2701, et seq. The DERP provides authority to cleanup petroleum contamination if it poses an imminent and substantial endangerment to public health, welfare, or the environment. All remaining data gaps associated with the A711 site will be addressed under the newly created A711 POL project.

This Proposed Plan highlights key information from the *Remedial Investigation Report* (USACE, 2007) and the *Historical Data Compilation and Data Gap Investigation Report* (USACE, 2021). These reports are available for review at the Kodiak Public Library, 612 Egan Way, Kodiak, Alaska. Additional information on how to participate in the decision-making process is presented in the Community Participation section of this Proposed Plan.

A public comment period of no less than 30 days is being provided in accordance with ER 200-3-1 and following CERCLA § 117(a) and NCP § 300.430(f)(3). New information or recommendations received during the public comment period may result in a modification of the recommendations.

ACRONYMS

This Proposed Plan contains many acronyms that are used to represent complex terms, titles, and other words or phrases. The use of acronyms enables us to provide more information to the reader with less space and greater brevity. We have provided a list of acronyms and their meanings on page 9 of the Proposed Plan. Please refer to the list, as needed, to improve your understanding of the site.

PURPOSE

The purpose of this proposed plan is to:

- describe the environmental conditions at the site,
- describe the investigations, remedial actions, and removal actions conducted at the site pertaining to CERCLA, and
- provide information on how the public can be involved in the decision-making process.

SITE BACKGROUND AND CHARACTERISTICS

The Building A-711 site is located within the boundaries of the 26,000-acre U.S. Coast Guard (USCG) Base Kodiak on Kodiak Island, Alaska, north of the Kodiak Airport, approximately 4.5 miles southwest of the city of Kodiak, and approximately 400 feet northeast of the Buskin River (Figure 1). The site is located in the Buskin River Valley at the intersection of the Tom Stiles Road, Anton Larsen Bay Road, and Rezanof Drive. The site is located within three parcels owned by the USCG and leased to the following entities:

- 1500 Anton Larson Bay Road, leased to Alaska Department of Transportation and Public Facilities (AKDOT&PF)
- 5280 Tom Stiles Road, leased to AKDOT&PF and sub-leased to American President Lines (APL)
- 5152 Tom Stiles Road, leased to AKDOT&PF and sub-leased to Kodiak Transfer, Inc.

Building A-711 is a subarea to the Navy/Army FUDS property (F10AK1007), which includes land on both sides of West Rezanof Drive. The main features of the site include Building A-711 and the former Quartermaster Gas Station (Figure 2).

Building A-711 was originally constructed as an ordnance shop for the U.S. Army during World War II. The building was transferred to the U.S. Navy in 1953 for use as an automotive hobby shop; in June 1970, it was used for auto vehicle storage, and in August 1971 as a heavy-duty lube rack. In 1972, after all U.S. Navy operations ceased on Kodiak Island, the entire Base Kodiak was transferred from the U.S. Navy to the USCG; this transfer occurred after the building was leased to the AKDOT&PF in 1971 (USACE, 2021). The site had at least two 3,000-gallon aboveground storage tanks (ASTs) used to store gasoline and diesel fuel and one 2,000-gallon underground storage tank (UST), designated MA6, used to store heating oil. UST MA6, located southeast and adjacent to Building A-711, was installed in 1942 and removed in 1995.

The former Quartermaster Gas Station, located approximately 400 feet south of Building A-711, is also part of the site. The Quartermaster Gas Station was constructed and operated by the U.S. Army until Fort Greely was moved to Delta Junction, Alaska in 1952. The gas station was no longer in service upon transfer to the USCG in 1972. A total of fifteen 5,000-gallon USTs used to store gasoline, diesel fuel, and motor oil were located at the site and were removed in 1995 (USACE, 2009); waste oils and reportedly, industrial fluids, were also stored in the USTs at the former Quartermaster Gas Station. The concrete pad and concrete utilidors were also removed in 1995 and field screening indicated contamination in these soils was below regulatory criteria.

Building A-711 remains under lease to AKDOT&PF and is currently used as a maintenance shop. Current land use is industrial and will remain so by the lessee, AKDOT&PF, for the foreseeable future under federal land ownership (USACE, 2021). Drinking water for the building is provided by the USCG Base Kodiak, which is sourced from Buskin Lake.

PRIOR INVESTIGATIONS

The USACE has conducted Site Inspections (SI), Interim Removal Actions (IRA), and Remedial Investigations (RI) at the A-711 site since 1988 following the CERCLA 120(d) process for management and remediation at sites with media contaminated with hazardous substances. The following is a summary of historical inspections and investigations conducted under CERCLA at Building A-711. In addition to the list below, there have been multiple investigations at the site focusing on POL impacts. Those investigations are not listed here because a separate project has been created to address remaining POL impacts.

SI (1999): The SI involved excavating seventeen test pits to determine the lateral extent of contamination and collecting soil samples for laboratory analysis.

IRAs (1995 and 1999). The 1995 IRA included the installation of four groundwater monitoring wells, the removal of UST MA6, and fifteen 5,000-gallon USTs at the former Quartermaster Gas Station. The 1999 IRA involved assessing and removing contaminated soil from around UST MA6 and assessing the suspected contaminant pathway.

Groundwater Monitoring. Extensive groundwater monitoring activities have been conducted since 1995 to evaluate groundwater conditions and to determine whether contaminants were migrating to the Buskin River via groundwater or groundwater seeps along the river, or in groundwater flowing preferentially along abandoned wood-stave pipelines.

RI (2004). The RI included drilling soil borings to delineate an extensive separate-phase oily contamination (non-aqueous phase liquid [NAPL]) in the subsurface, collection and analysis of subsurface soil samples, and installation, sampling and analysis of groundwater monitoring wells (USACE, 2007).

The previous investigations and remedial action locations pertaining to potential CERCLA COCs are shown on Figure 3.

SITE CHARACTERIZATION

Numerous soil and groundwater characterization activities have occurred at the Building A-711 site since 1995. Previous investigations conducted determined that contamination at the site is derived from POLs and although CERCLA hazardous substances, namely polychlorinated biphenyls (PCBs) and chlorinated solvents, have historically been detected above USEPA screening levels, there is no record of a DoD release of those contaminants at this site. Additionally, there are multiple non-DoD sources onsite from post abandonment use that may have contributed to the release of PCBs and chlorinated solvents near Building A711, for example from the maintenance shop, from parked cars and fleet equipment, and from documented poor storage of paint cans, drums, and fuel storage tanks. The following activities described below briefly summarize characterization of the site, relevant only to CERCLA.

Soil

An IRA was conducted in 1995 to remove USTs no longer in use near building A711 and from the former quartermaster gas station. The UST MA6, used to store heating oil adjacent to Building A-711, was removed, as well as fifteen 5,000-gallon USTs at the former Quartermaster Gas Station (USACE, 2000). A thick oil was observed seeping into the upgradient sidewall (towards Building A-711) during removal activities at the former quartermaster gas station. Test pits were excavated to evaluate the source of oil, and it was determined that the oil likely originated closer to Building A-711. Over 55,000 gallons of contaminated liquids, approximately 540 cubic yards (CY) of contaminated soil, and 313 tons of debris were removed. The excavation extent from the IRA activities is presented on Figure 3. The oily material was characterized through laboratory analysis as petroleum hydrocarbons consistent with lubricating oil, possible bunker fuel, and diesel fuel. Soil samples were collected for analysis from the stockpiled soil and from the excavation prior to backfilling. Three samples were collected at the soil-groundwater interface and one sample was collected from the excavation sidewall closest to Building A-711 at approximately 5.5 feet below ground surface (bgs). Analytical samples were analyzed for PCBs, a CERCLA contaminant, as well as limited POL constituents. The PCB, Aroclor 1260, was detected in the sidewall sample at a concentration of 0.00074 milligrams per kilogram (mg/kg) and in the stockpiled soil at 0.0026 mg/kg, but below the industrial and regional USEPA Regional Screening Levels of 0.24 and 0.99 mg/kg, respectively. All other soil samples analyzed for Total PCBs were below the 1.0 mg/kg USEPA screening level. PCBs were additionally analyzed in a fluid sample collected from UST MA6 and were not detected.

During a 1999 IRA and SI, the perimeter of the former UST MA6 location was excavated more accurately to assess the concentrations of PCB contamination and hydrocarbons (USACE, 2000). Soils at a depth of approximately 6.5 feet bgs at a location beneath the wood stove piping were field screened for PCBs in conjunction with laboratory analysis. Four soil samples were collected and analyzed for PCBs during the UST MA6 removal; only PCB Aroclor 1260 was detected in one sample near the former MA6 UST (1.72 mg/kg), which exceeded both the industrial and residential USEPA Regional Screening Levels (Table 1). All other PCB sample results were non-detect. The extent of soil contamination was estimated as 105,000 square feet, and 128 CY of contaminated soil was removed, including previously stockpiled soil (80 CY) from the 1995 IRA and from the vicinity of the former UST MA6 and the former Quartermaster Gas Station.

Twenty-four (24) soil borings were advanced at the site during a 2004 RI to delineate the extent of contamination (USACE, 2007). Soil samples collected from the borings were analyzed for RCRA metals, volatile organic carbons (VOCs), and PCBs. The detected concentrations of metals were determined to be attributed to naturally occurring background levels (USACE, 2007). Limited low-level detections of methylene chloride have been detected in soil that are assumed to be the result from laboratory contamination. Other CERCLA contaminants, including chlorinated VOCs, were detected in soil, but below USEPA Regional Screening Levels (USACE, 2007). PCBs, as Aroclors, have been sampled in 16 soil samples and four sediment samples at the site in 1995, 1999 and 2004. PCBs were ruled out during the 2004 RI as three detections from 13 soil samples analyzed were below the USEPA Regional Screening Level of 1.0 mg/kg for Total PCBs. Additionally, the CERCLA COCs which have been detected in soil at the MA6 AKDOT&PF maintenance building are not related to DoD activities.

The greatest CERCLA contaminant soil detection results remaining onsite at the Building A-711 site are listed below in Table 1.

Table 1. CERCLA Contaminant Soil Sample Results Remaining Onsite

Analyte	Greatest Soil Detection (mg/kg)	USEPA Soil Screening Level ¹ (mg/kg)
Tetrachloroethylene (PCE)	0.023	24 / 100
Trichloroethylene (TCE)	0.0076	0.94 / 6.0
Methylene Chloride	1.5	57 / 1000
PCB (Aroclor 1260)	1.72	0.24 / 0.99
Vinyl Chloride	ND	0.059 / 1.7

Notes:

See Acronyms and Abbreviations for definitions

¹ = USEPA Regional Screening Level (Industrial / Residential)

Highlighted = Exceeds USEPA Screening Level

ND = Analyte is not detected above the Limit of Detection (LOD)

Groundwater

Between 1994 and 2010, a total of 30 groundwater monitoring wells (one well was abandoned in 1999) have been installed at the site to evaluate groundwater conditions by sampling and laboratory analysis. The locations of the 29 monitoring wells currently at the site are presented on Figure 3. Groundwater concentrations are compared to USEPA Regional Screening Levels for Tap Water.

Vinyl chloride was identified above the screening level in groundwater in 2004 in two groundwater monitoring wells, MW-14-002 (1.2 micrograms per liter [µg/L]) and MW-14-003 (0.42 µg/L). Well MW-14-002 has been sampled for vinyl chloride 17 times between 2005 and 2014, all results were non-detect. Well MW-14-003 was decommissioned during a removal action in 2007 and was not resampled, but an adjacent well, MW-34-013, also sampled in 2004 did not have detections of vinyl chloride. As a result of the 2007 removal action, and because all other groundwater samples collected before and after 2004 from all wells onsite have had no detections of vinyl chloride, it is assumed that the vinyl chloride detected in MW-14-003 is no longer present in the groundwater.

Methylene chloride, PCE and TCE have also been detected in groundwater at the site, but consistently below the USEPA Regional Screening Levels for Tap Water. The sample results are listed in Table 2.

No other CERCLA contaminants have been detected in any of the sampling events above applicable regulatory criteria.

Table 2. CERCLA Contaminant Groundwater Sample Results Remaining Onsite

Analyte	Greatest Groundwater Detection (µg/L)	USEPA Regional Screening Level for Tap Water ¹ (µg/L)
Methylene Chloride ²	0.18	11
PCBs (Aroclor 1260)	ND	0.0078
Tetrachloroethylene (PCE)	0.46	11
Trichloroethylene (TCE)	0.23	0.49
Vinyl Chloride	ND	0.019

Notes:

See Acronyms and Abbreviations for definitions

¹ = USEPA Regional Screening Level (Tap Water)

² = Methylene chloride was determined to be a laboratory contaminant

Sediment, Surface Soil and Surface Water

The RI report (USACE, 2007) did not specifically identify any analytes in surface soil or surface water as COCs from samples collected from hand-dug seepage pits along the banks of the Buskin River. Low level polycyclic aromatic hydrocarbons (PAHs) were detected in the surface soil and surface water, but below regulatory criteria.

The RI report also did not identify sediment collected along the banks of the Buskin River as media warranting the development of remedial alternatives via the 2007 Feasibility Study (FS) (USACE 2008). Only one sample contained a PAH concentration above the lowest threshold effect level (TEL) sediment screening level. Phenanthrene in sediment sample SD-34-003 slightly exceeded the TEL criteria by 1.27 microgram per kilogram ($\mu\text{g}/\text{kg}$); however, low molecular-weight and high-molecular-weight PAH concentrations were below the lowest TELs in this sample, as well as in the remaining samples. Other low concentrations of PCBs, PAHs, and metals were reported in all four sediment samples, but were well below the lowest TEL sediment screening-level criteria.

The RI report did not identify any COCs in sediment, surface soil or surface water at the A-711 site.

Soil Vapor

Volatile compounds are present in both soil and groundwater; therefore, outdoor air is considered a complete exposure pathway for the site. Indoor air is considered a complete pathway for the site both currently and in the future. However, there are no volatile CERCLA COCs remaining above applicable regulatory levels. Any remaining contamination associated with this site will continue to be addressed under a separate project that has been created to address the POL-derived contamination.

SCOPE AND ROLE OF RESPONSE ACTIONS

Chemical concentrations detected in environmental media at the site have been compared to screening levels established by federal and/or state guidance. The COCs that are DoD-related have been determined to be derived from POLs and are exempt from remedial action under CERCLA Section 101. The CERCLA COCs which have been detected are not related to DoD activities or the NAPL since there is no record of a DoD release of the CERCLA COCs at this site, and because there are multiple non-DoD sources onsite from post abandonment use that may have contributed to the release of PCBs and chlorinated solvents near Building A711; for example from the maintenance shop, from parked cars and fleet equipment, and from documented poor storage of paint cans, drums, and fuel storage tanks. As a result, no CERCLA action will be taken by DoD at the site; however, continued actions to address the POLs under the DERP is currently underway as a separate FUDS project, "A711 POL."

SUMMARY OF SITE RISKS

The previous investigations conducted determined that contamination at the site is derived from POLs and although CERCLA hazardous substances were detected above USEPA screening levels, these are unrelated to DoD activities. No action will be taken under CERCLA. A new FUDS project, A711 POL, has been created to address the DoD POL-derived contamination.

BASIS OF PROPOSED DECISION

Under CERCLA Section 101(14), the term "hazardous substance" includes approximately 800 toxic substances listed under four other environmental statutes. Under Section 104(a)(2), both the definition of hazardous substance and the definition of "pollutant or contaminant" exclude "petroleum, including crude oil or any fraction thereof," unless specifically listed under those statutes (USEPA, 1987).

The COCs at the Building A-711 site that are DoD-related have been determined to be derived from POLs and are exempt from remedial action under CERCLA Section 101.

COMMUNITY PARTICIPATION

The NCP specifies the lead agency must provide a reasonable opportunity, not less than 30 calendar days, for submission of written and oral comments on the proposed plan and the supporting analysis and information located in the information repository. The public is encouraged to provide comments on the proposed decision presented in this Proposed Plan for A-711.

Public input is important to the decision-making process. Interested parties are encouraged by USACE and Alaska Department of Environmental Conservation (ADEC) to use the comment period to review the Proposed Plan and to provide their comments to the USACE.

In accordance with CERCLA Section 117(a), a public comment period of no less than 30 days for this Proposed Plan has been provided.

The public comment period will be from **31 July through 2 September 2023**.

Comments can be submitted to USACE by any of the following methods:

- Call: (907) 753-5680
- Email: Joshua.Barsis@usace.army.mil
- Mail a written comment to the following address:

**ATTN: Mr. Joshua Barsis, FUDS Project Manager
USACE, Alaska District
P.O. Box 6898
JBER, Alaska 99506-0898**

A final decision for the site will be made only after public comments are considered. Evaluation of public comments is a significant factor in the decision. USACE will provide a written response to all significant comments. A summary of the responses will accompany the Decision Document and will be made available in the Administrative Record located at the Information Repository.

Contact Information

For additional information, please contact:

**Mr. Joshua Barsis
FUDS Project Manager
(907) 753-5680**

Information Repository Location

Additional detailed information regarding the Buskin Beach Building A-711 site is available for your review. The Administrative Record file includes reports summarizing the results and data from previous investigations and remedial actions performed at the site. Please refer to the Information Repository located at the Kodiak Public Library, 612 Egan Way, Kodiak, Alaska. The Public Library can be reached at (907) 486-8686.

Electronic Copy

An electronic copy of this Proposed Plan is available during the public comment period at <https://www.poa.usace.army.mil/Library/Reports-and-Studies>.

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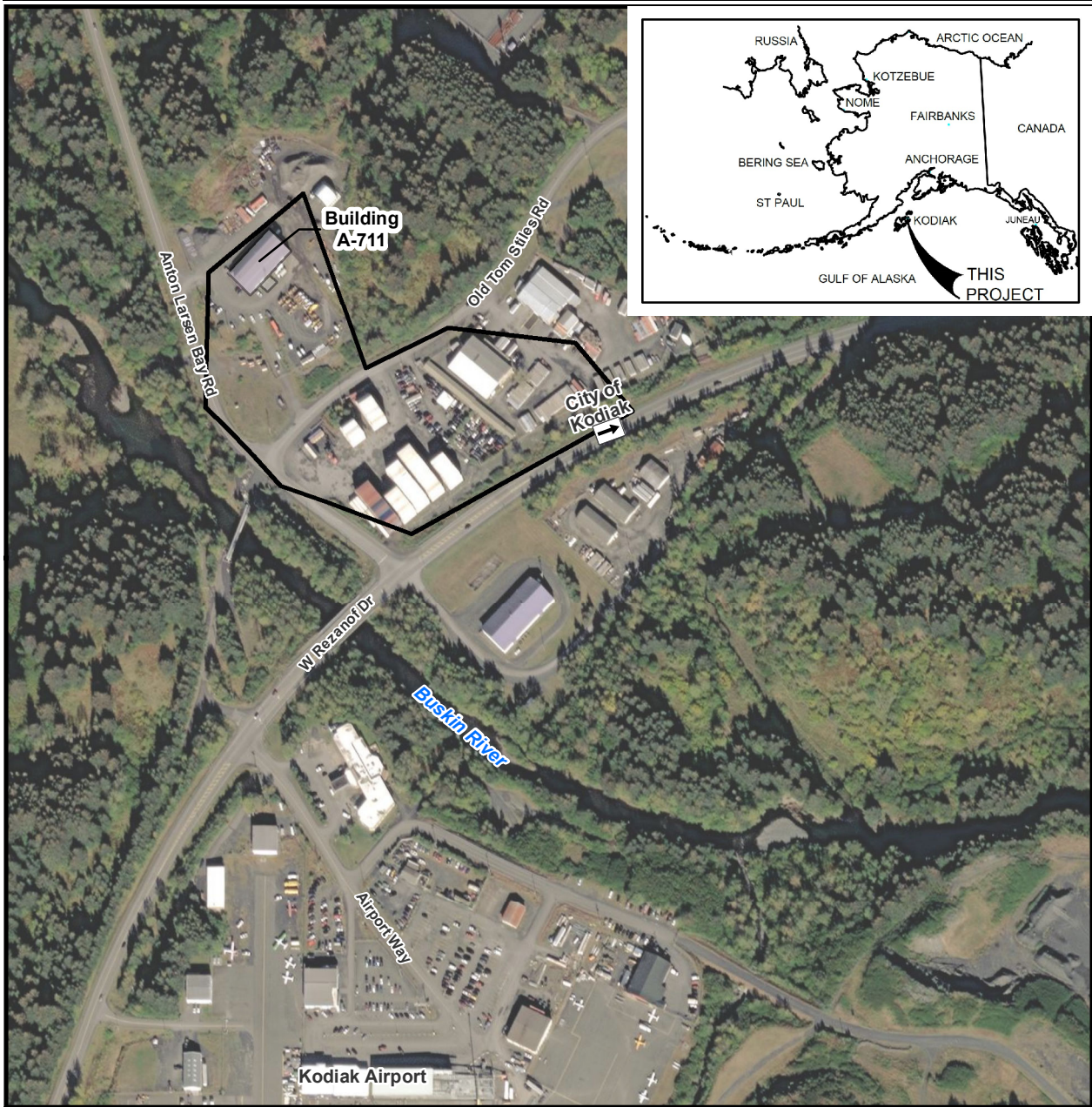
ACRONYMS

µ/L	microgram per liter
ADEC	Alaska Department of Environmental Conservation
AKDOT&PF	Alaska Department of Transportation and Public Facilities
APL	American President Lines
AST	aboveground storage tank
bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	contaminant of concern
CY	cubic yard
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
ER	Engineer Regulation
FS	Feasibility Study
FUDS	Formerly Used Defense Sites
IRA	Interim Removal Action
mg/kg	milligram per kilogram
NAPL	non-aqueous phase liquid
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
PAH	polycyclic aromatic hydrocarbons
PCB	polychlorinated biphenyls
PCE	tetrachloroethylene
POL	petroleum, oil, and lubricants
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
SI	Site Inspection
TCE	trichloroethylene
TEL	threshold effect level
U.S.	United States
UST	underground storage tank
USACE	U.S. Army Corps of Engineers
U.S.C.	U.S. States Code
USCG	U.S. Coast Guard
USEPA	U.S. Environmental Protection Agency
VOC	volatile organic compound

REFERENCES

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- USACE, 2007 (September). *Final 2004 Remedial Investigation Report, Building A-711, Kodiak, Alaska*. F10AK100704_07.08_0005_p.
- USACE, 2000 (May). *Final 1999 Interim Removal Action Report, Site 34 (Building A-711), Kodiak Island, Alaska*. F10AK100704_02.02_0501_a.
- USEPA, 1987 (July). *Memorandum. Scope of the CERCLA Petroleum Exclusion Under Sections 101(14) and 104(a)(2)*.

FIGURES



Legend

- Building A-711
- Approximate Project Boundary

1 inch = 417 feet 1:5,000
 0 100 200 400 600
 Feet

Notes
 Imagery from Alaska Department of
 Natural Resources 2020

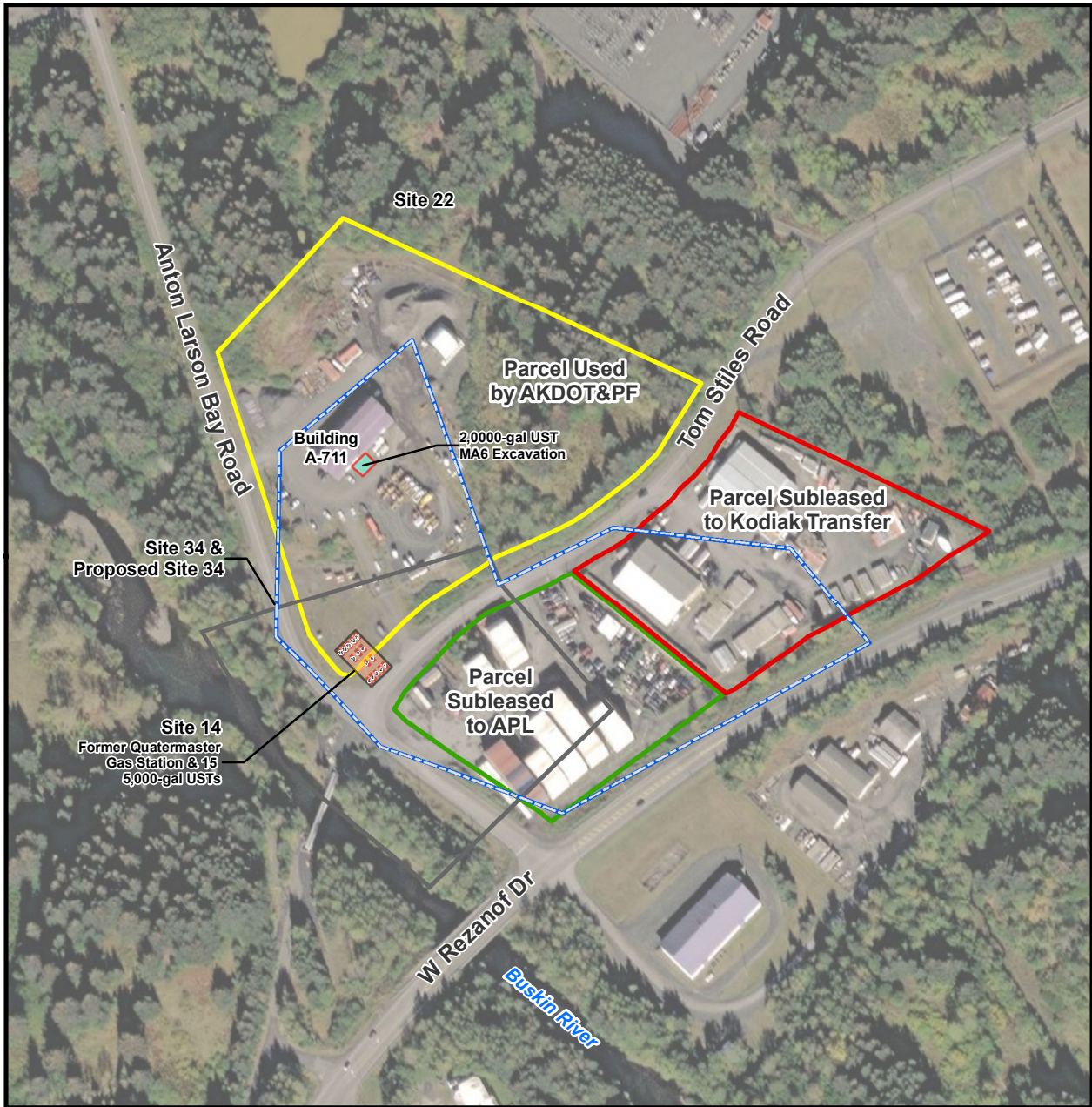
Project Location and Vicinity Map

Building A-711
 Property # F10AK10070-4
 Kodiak Island, Alaska

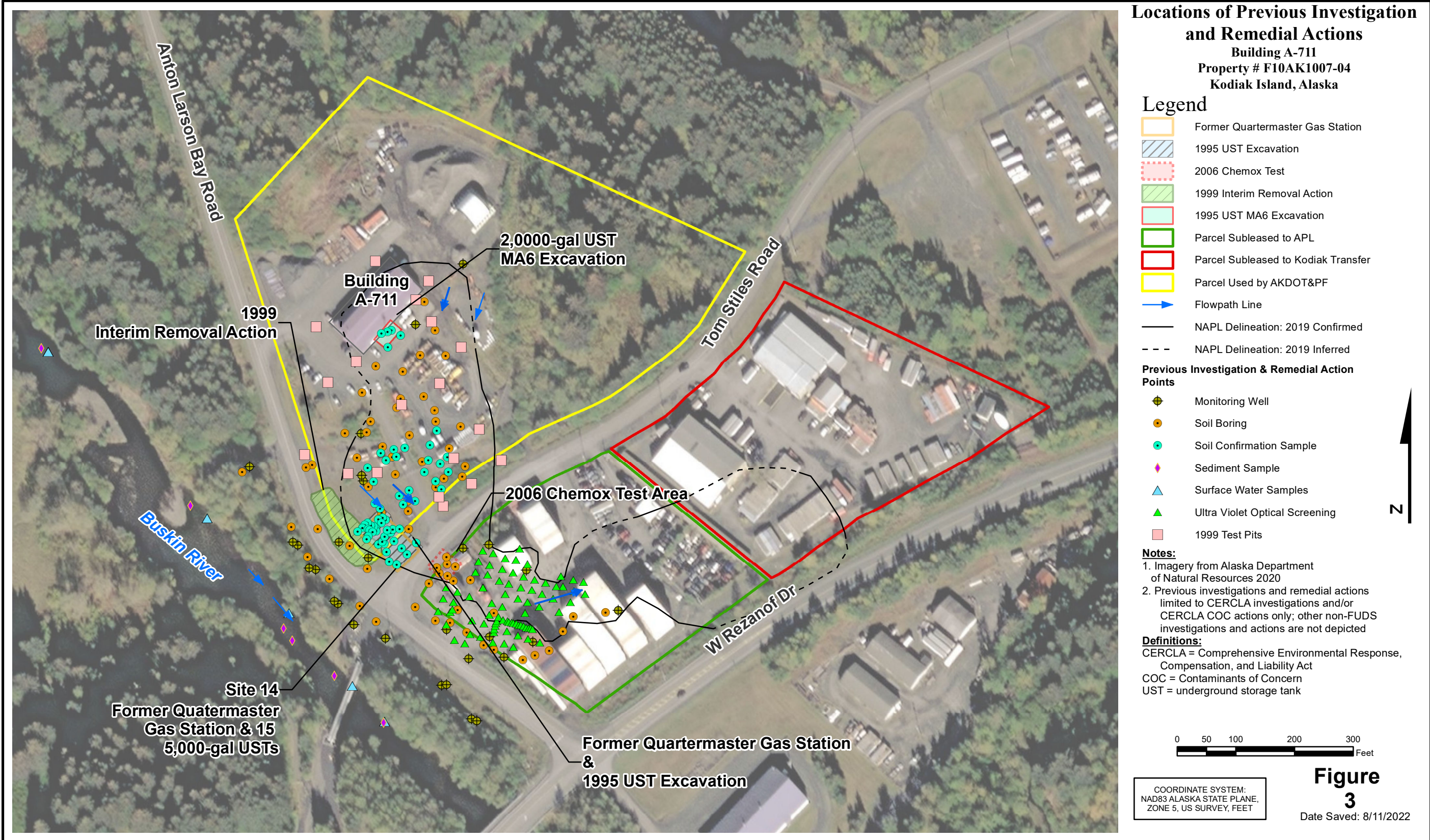
**Figure
1**

COORDINATE SYSTEM:
 NAD83 ALASKA STATE PLANE,
 ZONE 5, US SURVEY, FEET

Date: 8/11/2022



Legend		<p>USCG Property Parcels Within A-711 Project Area and Main Site Features Building A-711 Property # F10AK1007-04 Kodiak Island, Alaska</p> <p>Figure 2 Date: 8/11/2022</p>
<p>Approximate Project Boundary</p> <p>2,000-gal UST MA6 Excavation</p> <p>Former Quartermaster Gas Station</p> <p>1 inch = 300 feet 1:3,600</p> <p>0 50 100 200 300 400 500 Feet</p>	<p>5,000-gal UST</p> <p>Parcel Subleased to APL</p> <p>Parcel Subleased to Kodiak Transfer</p> <p>Parcel Used by AKDOT&PF</p>	
<p>COORDINATE SYSTEM: NAD83 ALASKA STATE PLANE, ZONE 5, US SURVEY, FEET</p>		<p>Notes 1. Imagery from Alaska Department of Natural Resources 2020</p> <p>Definitions AKDOT&PF = Alaska Department of Transportation and Public Facilities APL = American President Lines UST = underground storage tank</p>



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GLOSSARY OF TERMS

Alaska Department of Environmental Conservation (ADEC)	The ADEC provides regulatory oversight for the assessment and cleanup of contaminated sites in Alaska.
Administrative Record (AR)	The documents that are relied on for selecting a particular response at a site. This file is available for public review and a copy maintained near the site. The Kodiak Navy/Army A-711 Administrative Record file is maintained at the Kodiak Public Library.
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986.
CERCLA Contaminant	As defined by section 101(33), a pollutant or contaminant includes, but is not limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring. CERCLA section 101 excludes crude oil and fractions of crude oil - including the hazardous substances, such as benzene, that are indigenous in those petroleum substances - from the definition of hazardous substance.
Contaminant of Concern (COC)	Contaminants of Concern (COCs) are those contaminants which have been shown through analysis to be those that are likely to be causing risk to plants and animals at a site. Screening levels are selected based on the exposure pathways and media identified in the conceptual site model.
Decision Document	A public document that describes the remedy selected for a site, the basis for the choice of that remedy, and provides responses to public comments.
Defense Environmental Restoration Program (DERP)	Established law authorizing environmental investigation and cleanup at sites in the U.S. and its territories that the U.S. Department of Defense (DoD) either currently owns or owned in the past.
Department of Defense (DoD)	An executive branch department of the federal government of the U.S. charged with coordinating and supervising all agencies and functions of the government concerned directly with national security and the U.S. Armed Forces.
Feasibility Study (FS)	A study undertaken by the lead agency to develop and evaluate options for remedial action. The RI data are used to define the objectives of the response action, to develop remedial action alternatives, and to undertake an initial screening and detailed analysis of the alternatives. The term also refers to a report that describes the results of the study.

Formerly Used Defense Sites (FUDS)	Properties that, prior to October 16, 1986, were owned, leased, or otherwise possessed by the U.S. and under the jurisdiction of the U.S. Secretary of Defense prior to 1986. The Department of Defense is responsible for environmental restoration of these properties. The U.S. Army is the executive agent for the program and the U.S. Army Corps of Engineers manages and directs the program's administration.
Groundwater	Water found below the ground surface that fills the small openings in soil, between rocks, or in the cracks and openings of bedrock (fractured bedrock). Groundwater can be the source of drinking water through municipal or domestic wells.
Interim Removal Action (IRA)	Removal actions are interim actions to clean up or remove hazardous materials.
Monitoring Well	Wells used to collect chemical concentration information in groundwater over a period of time.
Nonaqueous-phase Liquid (NAPL)	Hydrocarbons that exist as a separate, immiscible phase when in contact with water and/or air. Light nonaqueous-phase liquids (LNAPLs) are undissolved chemicals, typically petroleum products, which float on the surface of groundwater rather than mix with it. A good analogy would be oil and vinegar salad dressing.
National Oil and Hazardous Substances Pollution Contingency Plan (NCP)	The plan revised pursuant to 42 U.S. Code (U.S.C.) 9605 and found at 40 CFR 300 that sets out the plan for hazardous substance remediation under CERCLA.
National Priorities List	The list, compiled by USEPA pursuant to CERCLA section 105, of uncontrolled hazardous substance releases in the U.S. that are priorities for long-term remedial evaluation and response.
Petroleum Hydrocarbons	A very broad range of chemicals that comprise oil and products refined from oil, such as gasoline and diesel. The main classes of petroleum hydrocarbons of environmental concern are aromatic hydrocarbons (e.g., benzene, ethylbenzene, toluene, and xylenes); polycyclic aromatic hydrocarbons (e.g., benzo(a)anthracene, benzo(a)pyrene, dibenzo(a,h)anthracene and naphthalene); gasoline additives; and combustion emissions from fuels. Total petroleum hydrocarbons will contain only some, or a mixture, of these chemicals.
Petroleum, Oil, and Lubricants (POLs)	A common abbreviation used to describe the contents of tanks and associated piping that contains these materials. It is a broad term used by the DoD and includes all petroleum and associated products. Finished petroleum products include non-hydrocarbon compounds, such as additives and detergents, after they have been blended into the products.
Proposed Plan	The Proposed Plan identifies the proposed decision for a site that best meets the requirements of CERCLA and the NCP. The purpose of the Proposed Plan is to summarize the preferred cleanup strategy, rationale for the preference, and provide the public with a reasonable opportunity to comment on the proposed decision and to participate in the final decision for a site.
Public Comment Period	The time allowed for the members of a community to express views and concerns regarding an action proposed to be taken by the USACE.

Remedial Action (RA)	Those actions consistent with permanent remedy taken instead of or in addition to removal actions in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release of hazardous substances so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment. The term includes, but is not limited to, such actions at the location of the release as storage, confinement, perimeter protection using dikes, trenches, or ditches, clay cover, neutralization, cleanup of released hazardous substances and associated contaminated materials, recycling or reuse, diversion, destruction, segregation of reactive wastes, dredging or excavations, repair or replacement of leaking containers, collection of leachate and runoff, onsite treatment or incineration, provision of alternative water supplies, and any monitoring reasonably required to assure that such actions protect the public health and welfare and the environment.
Remedial Investigation (RI)	A study performed at a site to determine if chemicals are present at a site and where, if the chemicals are moving in the environment, and if these chemicals pose an unacceptable risk to humans and animals.
Responsiveness Summary	A summary of responses to the public's comments and concerns regarding the Proposed Plan. These comments and concerns can be in writing. The Responsiveness Summary is included as part of the Decision Document.
Screening Level	Chemical concentrations established to protect human health under different land use scenarios (e.g., residential or industrial) for chemicals in soil, surface water, sediment, and groundwater.
Site Inspection (SI)	The SI tests air, water, and soil at the site to determine what hazardous substances are present and whether they are being released to the environment and are a threat to human health.

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STAKEHOLDER COMMENTS

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Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC)

Document Reviewed: Draft 2021 Kodiak Navy/Army Building A-711 HTRW Proposed Plan

Commenters: Curtis Dunkin-ADEC Project Manager

Date Submitted: March 14, 2022

USACE Response: August 1, 2022

#	Page #	Section	ADEC Comment	Response
1.	1	Intro.	Discussion in the last paragraph on this page should be revised/amended in order to better specify/clarify the following: 1) whether USACE-FUDS is proposing to manage/address the POL contamination under a separate project, conditional of determination and agency/stakeholder concurrence that no further action under CERCLA is appropriate or whether this process has already been initiated; 2) what that separate project mechanism under DERP authority will be and when and how will it be initiated and implemented; and 3) the last sentence should specify that the remaining contamination does represent a current and future imminent and substantial endangerment to public health and the environment and will require adequate land use controls, site management, monitoring, and potentially additional remedial action in the future.	<p>1 & 2. Comment noted. USACE is proposing to manage/address the POL contamination under a separate project, A711 POL, which has already been created. The process is well underway and USACE has submitted a draft work plan to ADEC that is currently in review. The introduction states that remaining POL contamination is being addressed under a separate project. Minor clarification, where necessary, will be made to other parts of the text to clarify.</p> <p>Added the following to sentence 2 of 4th paragraph: Continued investigation and cleanup of the POL contamination at the site is being addressed under a separate project, A711 POL...”</p> <p>3. Noted. This Proposed Plan is specific to only the CERCLA contamination, which does not pose any risk as it is non-existent. The future POL Decision Document will discuss risk from the POL.</p>
2.	1	Site Bkgd.	Revisions are necessary to better clarify and present what is being referenced as ‘property’ and/or ‘project’ boundaries in narrative discussions and in figure depictions throughout the document. ADEC	Thank you for the comment. Figure 3 will be revised to show the NAPL boundary.

			<p>disagrees with what is currently discussed in narratives and depicted in figures as the 'project boundary'. What is considered to be or legally defined as the actual 'contaminated site' boundary as determined by the respective stakeholders may be different than what the FUDS program considers to be a 'project boundary'. Given the complexities and dynamics of this site (including e.g. current and past land uses and activities, additional contaminated sites and areas of concern that are adjacent to the Building A-711 contaminated site, extent characterization data gaps, land use control boundaries, etc.), applicable figures and narrative sections should be revised/amended to accurately and consistently clarify the differences between 'project boundary' vs. 'contamination extent boundary' vs. 'contaminated site boundary'. ADEC's understanding is that there are soil and groundwater data gaps remaining in the southern/southeastern areas of concern. Additionally the 'project' and 'contaminated site' boundaries should extend westward all of the way to the Buskin River.</p> <p>References to 'Navy/Army' and 'Army/Navy' are used interchangeably and should be revised throughout the entire document for consistency.</p>	<p>Please note that the objective of the PP is to illustrate that no CERCLA contamination exists, and that all remaining impacts will be addressed under the new project, A711 POL. Further evaluation of the POL impacts, POL contaminant boundary, or POL remaining data gaps will be addressed in under the A711 POL project.</p> <p>References to Navy/Army FUDS property have been revised in this manner.</p>
3.	3	Site Bkgd.	<p>The last sentence of the first paragraph on this page should be revised to clarify that waste oils and industrial fluids (at least reportedly based on ADEC's understanding) were also stored in the USTs at the former Quartermaster Gas Station.</p>	<p>Included in the 4th paragraph under the Site Background section: waste oils and reportedly, industrial fluids, were also stored in the USTs at the former Quartermaster Gas Station.</p>
4.	3	Prior Invest.	<p>Re: the statement in the last sentence of the first paragraph of this section, please see and apply ADEC's comments above in the Introduction section. The document should better specify what specifically will be worked by the FUDS program under the DERP authority going forward, and how that transition process will be documented and presented to stakeholders.</p> <p>All of the prior investigation efforts that are both directly related to the Building A-711 contaminated site and those related to adjacent areas of concern should be summarized in this section, both FUDS and non-</p>	<p>Revised to include: "In addition to the list below, there have been multiple investigations at the site focusing on POL impacts. Those investigations are not listed here because a separate project has been created."</p> <p>There is no CERCLA contamination, thus there are no exposure pathways to</p>

			FUDS that are relevant to the contaminated site model (CSM) in conjunction with the implemented phases of the CERCLA process in order to clearly present and adequately demonstrate the basis for the proposed no further CERCLA action decision. This should also be applied to the discussions in other related narrative sections (e.g. in the following Site Characterization section) and applicable figures in order to adequately and accurately present the current CSM.	receptors related to CERCLA contaminants.
5.	3	Site Charact.	ADEC disagrees with the statement in the first paragraph of this section that ‘no CERCLA COCs have been identified’ and this is not consistent with either the CSM as well as other references to this subject throughout the document. This statement is inappropriate and potentially misrepresenting the fact that CERCLA COCs have been previously detected in soil and groundwater, including concentrations in soils that exceeded cleanup levels. Even though some of these are considered to not represent widespread CERCLA contamination at the site (e.g. metals concentrations that are considered to be background, PCB detections for which follow on sampling at the location(s) could not be replicated, and/or contamination was or may have been removed), many of the COCs have still been detected throughout the site cleanup history. This should be more thoroughly and clearly presented in conjunction with all such statements ‘no CERCLA COCs’ throughout the document.	The 1 st Paragraph of Site Characterization was modified to indicate any CERCLA COCs detected at the site were below applicable screening levels. All mentions of CERCLA contaminant detections were clarified as detected, but not above applicable screening levels.
6.	4	Site Charact.	<u>Soil</u> : Re: the discussion of detections in the first paragraph of this page, please see and apply comment above related to this section on page 3.	<u>Soil</u> : Revised to the following – “Analytical samples were analyzed for polychlorinated biphenyls (PCB), a CERCLA contaminant, as well as POLs. The PCB, Aroclor 1260, was detected in the sidewall sample at a concentration of 0.00074 milligrams per kilogram (mg/kg) and in the stockpiled soil at 0.0026 mg/kg, but below the 1.0 mg/kg EPA screening level.”

		<p>Re: the statement in the second paragraph of this page ‘confirmed no PCBs’ please amend this and other related/similar statements throughout the document to specify whether this means non-detect or detected but below applicable regulatory criteria.</p> <p>The last statement of this section should be revised/amended to clarify whether CERCLA COCs were detected but below respective applicable screening levels, or if they were all non-detect; specify those CERCLA COCs that were detected and also the characterization efforts and/or decisions that supported the decision(s) to off-ramp those COCs from the next phases of the cleanup process.</p> <p><u>Groundwater:</u> Amend the last statement of this section re: ‘No CERCLA contaminants were detected’ similar to other prior comments above.</p> <p><u>Sediment and Surface Water:</u> The mention of the term ‘surface soil’ should be amended to specify ‘embankment’ in each reference for consistency.</p> <p><u>Soil Vapor:</u> The last sentence of this section should be revised. Why would this term be phrased ‘DoD-related CERCLA COCs’ given that multiple prior comments in the document state there are no CERCLA COCs? This should state e.g. ‘there are no CERCLA COCs remaining above applicable cleanup levels’. The remaining contamination including VOCs are currently understood by ADEC to be DoD-FUDS and the PP must be clear on this and that they will continue to be addressed by FUDS according to applicable regulatory requirements and that the FUDS contamination will continue to be adequately and appropriately managed by FUDS in the future</p>	<p>Amended all instances in the document to specify that detections were below applicable regulatory levels.</p> <p>Revised 2nd paragraph by removing “no PCBs” to the following: One soil sample was analyzed for PCBs during the UST MA6 removal; only PCB Aroclor 1260 was detected, but below applicable regulatory criteria.</p> <p><u>Groundwater:</u> Revised last sentence under Groundwater to include: No CERCLA contaminants were detected in any of the sampling events above applicable regulatory criteria.</p> <p><u>Sediment and Surface Water:</u> this section was revised to include Surface Soil to the Title. Changed embankment to “banks” as requested by USCG to simplify for the general public.</p> <p><u>Soil Vapor:</u> Revised the last sentence for soil vapor to the following: The remaining contaminants are DoD FUDS and will continue to be addressed under a FUDS project that has been created to address the DoD POL-derived contamination according to applicable regulatory requirements.</p>
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7.	5	Summary of Site Risks	<p>ADEC acknowledges that USACE-FUDS is not required to implement the CERCLA ‘process’ based on there being no CERCLA hazardous substances at the site above applicable cleanup levels. However CERCLA as well as other federal and state regulatory criteria still require the remaining contamination to be adequately managed. This needs to be specified clearly and consistently throughout the document in association with the statement ‘no action under CERCLA’.</p>	<p>Included/revised throughout the text that there will be no action under CERCLA, but that continued investigation will be completed under a separate project for the remaining impacts.</p>
8.		Figures	<p>Figures 1 and 2: Please see and apply related comments above, particularly comment pertaining to miscellaneous boundaries associated with the site and make revisions and amendments to these and other figures and related narrative sections accordingly.</p> <p>Figure 2: This figure is titled ‘main site features’ however only focuses on ‘parcel boundaries’. This figure title should be revised to e.g. ‘USCG Property Parcels Within A-711 Project Area’. The Buskin River should be labeled on all figures.</p> <p>A new figure should be included that actually identifies all of the relevant ‘main site features’ including both terrain (e.g. river and flow direction, roads, buildings, utilities) and constructed, and also depict the known extents of soil and groundwater contamination including those that are currently inferred as well as those for which USACE-FUDS is not the lead RP (e.g. the DOT Building, APL, etc.).</p> <p>General: The USCG recently completed its Buskin Waterline project and the current day site features and ground surface may differ from what is depicted in the imagery being used for the figures in this document. Are there newer aerial images that would provide a more current representation of the site? Please specify the date of the imagery in the figures.</p>	<p>Revised all figures to show property and project boundaries.</p> <p>Figure 2 title has been revised to: USCG Property Parcels within A-711 Project Area and Main Site Features. Buskin River has been labeled on all figures.</p> <p>The 2019 NAPL confirmed and inferred delineation was included on Figure 3.</p> <p>An aerial image from 2020 was used in the updated Figure 3; it is noted on the Figure</p> <p>Added all investigation points to Figure 3 and noted that the previous investigations and remedial actions limited to CERCLA investigations and/or CERCLA COC actions only; other non-FUDS investigations and actions are not depicted. The extend of NAPL from 2019 is depicted on Figure 3.</p>

			<p>Figure 3: ADEC's understanding is that more investigation points were conducted in the southern/southeastern portions of the site that are not depicted in this figure.</p> <p>Title should be amended and a figure note included to clarify whether these are limited to CERCLA investigations and/or CERCLA COC actions only, and that there are other 'non-FUDS' investigations and actions that are not depicted.</p> <p>The known and inferred extents of contamination in groundwater and soil should be depicted on this figure along with the current existing land use control boundaries.</p>	
9.			End of ADEC Comments	

**EPA Review Comments on
U.S. Army Corps of Engineers,
Alaska District,
Draft Proposed Plan
Building A-711, December 2021
U.S. Coast Guard Base Kodiak**

January 21, 2022

The EPA has reviewed the U.S. Army Corps of Engineers' (ACE) *Draft Proposed Plan for Building A-711* (Plan), dated December 2021, and received by email on December 8, 2021. EPA has the following comments on the Report. General comments are followed by specific comments.

General Comments

The EPA does not concur with issuing a “No Further Action” decision at this time, until the remaining data gaps that were identified in EPA, ADEC and US Coast Guard comments in the Corp’s *Draft Historical Data Compilation and Data Gap Investigation Report, Building A-711 Fuel Oil Leak, Appendix J (May 2020)* (Report) are addressed. EPA understands from conversations with the Corps that the purpose of issuing this decision is to close out one type of contract mechanism and to open another type, and that all the work remaining at the site will be addressed under the replacement contract. Therefore, a clear description of the remaining data gaps and work to be completed must be included in the Proposed Plan. Please see EPA’s comments, in Appendix J of the above-mentioned Report, for the remaining data gaps that must be addressed.

USACE Response (August 1, 2022)

Petroleum is exempt under CERCLA. USACE has determined that all contamination associated with the NAPL source at this site is from a petroleum source. The decision to close the Project -04 site is based on there being no CERCLA contamination present. The decision to open the -13 project for the same area, now known as A711 POL, was so that USACE could continue to address the data gaps identified in the historical data compilation report under the DERP. Minor revisions have been made to clarify this point in the existing proposed plan. This proposed plan is meant only to address CERCLA impacts, and it would not be appropriate to talk about the non-CERCLA POL data gaps in the current proposed plan.

Specific Comments

1. Page 1, Second Paragraph

The site is described as a CERCLA site here and throughout the Plan. However, this paragraph should also state that this site is also a RCRA site, managed under the Coast Guard’s RCRA Permit.

USACE Response (August 1, 2022):

Added a sentence at the end of paragraph 2 to clarify that site (known as Site 34) is also managed by Coast Guard Base Kodiak under a Resource Conservation and Recovery Act (RCRA) Permit.

2. Page 1, Third Paragraph

This section recommends that the Remedial Investigation Report should be reviewed to gain an understanding of the environmental investigation activities that support the “No Action” decision. For a more up to date and comprehensive understanding of the status of work at this site, the Report cited above, including its Appendix J, which includes remaining data gaps, is also recommended.

USACE Response (August 1, 2022)

Revised to the following: The USACE encourages the public to review the Remedial Investigation Report (USACE, 2007) and the Draft Historical Data Compilation and Data Gap Investigation Report (USACE, 2020), including its Appendix J, to gain a comprehensive understanding of the site.

3. Page 3, last Paragraph

This figure appears to identify the previous excavations, but not the previous investigation areas. Please clarify. A Table showing the potential CERCLA COCs that have been detected and their maximum concentrations and locations on a figure would be useful to show the extent of the contaminants identified in the past investigations.

USACE Response (August 1, 2022)

Figure 3 was revised to show all investigation and remedial action points. A table listing the CERCLA COCs has been created in the document (Table 1). None exceed EPA screening levels. These soil boring sample locations are not identified by ID on Figure 3 since none of the COCs exceeded screening levels.

**REVIEW
COMMENTS**

PROJECT: Building A-711 HTRW FUDS, F10AK10070-4
DOCUMENT: Draft No Action Proposed Plan (December 2021)
LOCATION: Kodiak Island, Alaska

U.S. ARMY CORPS OF ENGINEERS CEPOA-EN-EE-TE		DATE: 03/15/2022 REVIEWER: USCG CEUJ EMB K. O'Connor PHONE: 907-463-2427	Action taken on comment by (August 1, 2022): USACE: Joshua Barsis North-Wind: Renee LaFata				
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	RESPONSE	USCG RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	ADDITIONAL RESPONSE	USCG RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)

1	General	<p>Suggest revising the Proposed Plan in a manner that will make it clear to the general public that FUDS is continuing to investigate POL contamination at the site and that this No Action is only for CERCLA compounds. As it is currently written, USCG does not believe the general public will understand what the purpose of this document is and what will continue to happen at the site.</p> <p>For example:</p> <p>(1) The last paragraph on Page 1 makes sense to FUDS and the PDT, but the general public will not understand what this means. Suggest stating in plain terms that this No Action PP is for CERCLA contaminants and that additional work on the POL contamination is continuing under the referenced DERP project.</p> <p>(2) In the Purpose section, the second bullet does mention CERCLA contaminants. However, the general public will not understand what that means without more context. Suggest adding a sentence in plain terms.</p> <p>(3) The Basis of No Action section should clarify that additional work is being done at the site to address POL contamination.</p>		<p>(1) Revisions have been made to the text in several locations to address this comment. For example, the introduction has been revised to state: The contaminants of concern (COCs) at the Building A-711 site that are DoD-related have been determined to be derived from petroleum, oil, and lubricants (POL) and are exempt from remedial action under CERCLA Section 101. Continued investigation and cleanup of the POL contamination at the site is being addressed under a separate project, A711 POL, under the authority of the DERP, U.S.C. Title 10, Section 2701, et seq. The DERP provides authority to cleanup petroleum contamination if it poses an imminent and substantial endangerment to public health, welfare, or the environment. All remaining data gaps associated with the A711 site will be addressed under the newly created A711 POL project.</p> <p>(2) Agree that the public may not understand the difference in cleaning up under CERCLA vs DERP. However, the introduction section talks about USACE responsibility under CERCLA, and later statements note that POL is exempt under CERCLA. Some minor revisions have been made in the text to hopefully clarify this, and at least make it clear that continued investigation will happen under a POL project. Also, added a definition to the glossary for "CERCLA contaminants."</p> <p>(3) Clarified in the 2nd paragraph of the Basis of No Action section to direct the reader to the introduction where it is discussed that additional work is being conducted.</p>	<p>1 A</p> <p>2 A</p> <p>3 A</p>		
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**REVIEW
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2	Site Background and Characteristics	Base Kodiak is no longer a Support Center. Please change Support Center to Base Kodiak.		Changed USCG Support Center to USCG Base Kodiak.	A		
3	Site Background and Characteristics	Suggest stating in the first paragraph of this section that the site is also managed under the Base Kodiak RCRA Permit.		The information regarding the Kodiak RCRA permit has been added to the introduction.	A		
4	Site Background and Characteristics	“Building A-711 is a subarea to the Army/Navy FUDS property (F10AK1007)...” The Army/Navy FUDS property has not yet been introduced. Further, the general public will not understand what the FUDS property ID number is. Suggest clarifying for public.		Made clarification in paragraph 5 of the Introduction indicating “the continued investigation and cleanup of the POL contamination...”	A		
5	Site Background and Characteristics	For the paragraph discussing the former Quartermaster Gas Station, suggest stating when it was demolished.		The Quartermaster Gas Station was demolished sometime between 1951 and 1964. An exact date is not known.	A		
6	Site Background and Characteristics	“The building remains under lease...” Suggest clarifying that this is Building A-711.		Clarified the leased building is A-711.	A		
7	Figure 1	Suggest adding the outline of the former Quartermaster Gas Station to the figure.		An outline of the former Quartermaster Gas Station has been added to Figure 2.	A		
8	Prior Investigations	“Any investigations focusing on POL impacts only are not discussed...” Suggest revising the sentence as follows:” In addition to the list below, there have been multiple investigations at the site focusing on		Revised sentence as suggested to: In addition to the list below, there have been multiple investigations at the site focusing on POL impacts. Those investigations are not listed here because a separate project has been created	A		

**REVIEW
COMMENTS**

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		POL impacts. Those investigations are not listed here because a separate project has been created..."					
9	Site Characterization - Soil	"...based on SI findings from 1998 through 1994." This sentence is unclear. Text in the section above implies the SI was performed in 1999.		Revised the sentence to the following: An IRA was conducted in 1995 based on SI and IRA findings from 1998 through 1994	A		
10	Site Characterization - Groundwater	"Between 1994 and 2010..." The previous section states that groundwater monitoring was performed between 1995 and 2019.		The MWs were installed at this time (1994 through 2010); added a sentence that indicated when monitoring was performed: Groundwater monitoring was performed since 1995 for POL and CERCLA COCs.	A		
11	Site Characterization - Sediment and Surface Water	The first paragraph uses the term "surface soil" multiple times. Based on the Section Heading, assuming this should be "surface water" instead?		Revised the heading to include Surface Soil in addition to Sediment and Surface Water. The following paragraphs were rewritten to clarify sample locations, media and results.	A		
12	Site Characterization - Sediment and Surface Water	"... nor did the RI report identify Buskin River embankment". Is the term "embankment" needed in this sentence? Consider simplifying for the general public.		Concur. Revised to indicate the samples were collected along the "banks" of the Buskin River.	A		
13	Site Characterization	Suggest adding a summary table showing the CERCLA COCs detected at the site and their corresponding EPA screening levels.		Created Table 1 under the Site Characterization section.	A		
14	Figure 2	Figure 2 is titled "Main Site Features", but it really just shows the land ownership at the site. Consider renaming the figure.		Figure 2 title was revised to: USCG Property Parcels Within A-711 Project Area and Main Site Features."	A		
15	Figures	Consider adding a figure that does depict the main site features that FUDS is cleaning up: the former Army structures and tanks that are referenced throughout the PP. <ul style="list-style-type: none"> Two 3,000-gal ASTs One 2,000-gal UST MA6 		The main site features have been revised on each of the figures.	A		

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		<ul style="list-style-type: none"> Quartermaster Gas Station (15 5,000-gal USTs) 					
16	Figure	There is no figure that summarizes the data that is discussed in the narrative. A figure would benefit the public's understanding of the site status, additionally the Coast Guard can utilize such a figure for communicating land use controls for the site.		Thank you for the comment. Figure 3 will be revised to show the NAPL boundary. The objective of the PP is to illustrate that no CERCLA contamination exists, and that all remaining impacts will be addressed under the new project, A711 POL. Further evaluation of the POL impacts, POL contaminant boundary, or POL remaining data gaps will be addressed under the A711 POL project.	A		
17	Information Repository	States that reports are available for review in the Buskin Beach A711 Administrative Record? A711 is not a Buskin Beach site?		Revised to indicate the reports can be reviewed in the Administrative Record file located at the Kodiak Library Information Repository, instead of the Buskin Beach A-711 Administrative Record.	A		