

From: [O'Rourke, Rory \(he/him/his\)](#)
To: [Jason Brune](#)
Cc: [Ogle, Kimberly \(she/her/hers\)](#); [Masters, Kyle](#); [cynthia.trapp](#); [Wade, Guy](#)
Subject: NSB Closure Plan Version 3, May 2024 EPA Comments
Date: Friday, May 10, 2024 4:15:00 PM
Importance: High

Hi Jason:

Apologies for the informal nature of these comments for North Slope Borough Quality Assurance Project Plan (QAPP) v3 from May 2024. I am trying to provide a quick turnaround due to our public comment period being scheduled to start next week. Would you be able to provide an updated QAPP or QAPP Addendum early next week that addresses these comments so we can post an updated version on our website in time for the public comment period?

1. We are greatly concerned that no Project Chemist is identified and many staff roles are listed as "TBD" in Table 3-1 and 4-1. The first closure is expected to start in 5 weeks. Please identify all staff and personnel roles in Tables 3-1 and 4-1 to help facilitate project communication and coordination.
2. The Response to Comment #11 from May 7, 2024, says you updated SW8082 to SW8082A in Tables B-1 and B-2, however there are no SW8082A references in Tables B-1 and B-2. Please update Tables B-1 and B-2 to include the method as appropriate in these tables.
3. No Table A-4 appears in Appendix A even though it is referenced in Response to Comment #15 from May 7, 2024. Please add Table A-4 or remove any reference to Table A-4.
4. Please ensure that the Tables B-1 and B-2 "Comparison of Laboratory DLs, LODs, and LOQs in with CPSs" for chromium is speciated chromium (III) and (VI) to adequately determine compliance with the soil closure performance standards. In addition, please check Table B-1 and update Table B-1 to include all hazardous substances regulated under 18 AAC 75 or justify why these hazardous substances are not included in analyses.

Please reach out if you have any questions. Thanks!

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