



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVENUE
NEW ORLEANS LA 70118-3651

Estuado Silva, P.G., Administrator
Remediation Division
P.O. Box 4314
Baton Rouge, LA 70821-4314

RE: Response to Investigation Work Plan Approval
Former US Coast Guard Integrated Support Command; **AI Number 9009**
USACE Inner Harbor Navigational Canal (IHNC) Lock
4640 Urquhart Street, New Orleans
Orleans Parish, LA

Dear Mr. Silva,

I am writing to acknowledge receipt of the letter dated September 8, 2023, from Laura LeBouef regarding the Investigation Work Plan submitted on July 24, 2023. We appreciate the detailed review and are committed to addressing each stipulation as requested. To document our concurrence with the suggested improvements to the work plan, we have provided responses to each of the five items in the letter:

1. Depth of Borings: As requested, where feasible, borings will be advanced to 15 ft below ground surface (bgs). All sections of the work plan addressing boring depth will be revised to indicate a depth of 15 ft. Justification will be provided in the investigation report for any boring not extending to 15 ft bgs.

The work plan, as written, limited the boring depth to 13 ft. based upon the following information. For the 2019 investigation, seven borings were advanced at AOI-1 with six reaching a depth of 15 ft. (Boring B-3, placed within the former AST containment, hit refusal at 5 ft.). The other six borings were sampled at the 13 to 15 ft. interval. Except for a single hit on arsenic at boring B-1, of 12.1 mg/Kg, all samples at that depth were clean (less than the RECAP Screening Standard for all COCs). At AOI-2 thirteen borings were advanced to a depth of 15 ft. Eleven of the borings were sampled at the 13 to 15 ft interval (B-19 and B-20 were not sampled). All samples at that depth were clean. The 2019 investigation report and the submitted 2023 work plan concluded that there was sufficient data to indicate that the vertical extent of the COCs at both AOIs does not exceed 13 ft.

2. Background Samples: We will revise the work plan to add two additional background boring/sampling locations and the collection of four discrete samples in accordance with the requirements of RECAP 2.13.

3. Soil Sample Intervals: As required by RECAP B2.5.2, soil samples will be collected at each boring location from, at a minimum, the following locations and intervals: 1) soil interval with the highest organic vapor measurement; 2) soil-groundwater interface; 3)

the total depth of the boring; and 4) the 0-3 ft bgs interval. All sections of the work plan addressing sample depth and location will be revised to indicate these sampling locations and intervals. Justification will be provided in the investigation report for any deviation from this requirement. Additional samples may be taken to help delineate the vertical extent of contamination.

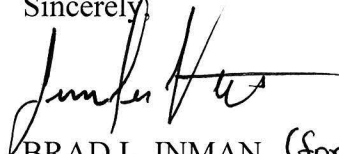
The work plan, as written, with the requirement to collect soil samples from the 6-8 ft interval was based upon the following information. As provided above, the work plan concluded that there was sufficient existing data to indicate that the extent of contamination does not exceed 13 ft. In preparing the work plan, we also concluded that there was sufficient data in the 2019 report to indicate that contamination exists from 0 to 5 ft., at both AOIs, across some yet to be determined horizontal area. Our existing data is insufficient to determine the extent of contamination in the 5 to 13 ft. interval. The 6 to 8 ft sampling interval was selected as being the upper extent of the 5 to 13 ft. interval of interest. We do not anticipate finding any SVOCs or petroleum fractions below the thin and shallow groundwater layer (approximately at 3-5 ft bgs for AOI-1 and 5- 7 ft for AOI-2, with a widening and deepening of the layer approaching the canal). However, samples will be collected below the groundwater layer to verify this assumption and to help determine the vertical extent of contamination.

4. Elevated Organic Vapor Measurement: The work plan sampling plan will be revised to require that if the bottom of any boring has an elevated organic vapor measurement, then that boring shall be extended deeper to support appropriate vertical delineation of the contamination.

5. Reporting of PAHs: The work plan will be revised to require that all 16 parent PAHs identifiable by method 8270D be reported with the analytical results and that the data be included in the investigation report.

We will continue to keep LDEQ informed of the status of the work plan implementation by providing yearly updates by October 30th of each year, as requested.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad L. Inman", with a stylized flourish at the end.

BRAD L. INMAN (Sor)

Chief, Projects and Restoration Branch