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**DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM**

August 14, 2000

Richard Jackson
Headquarters, Alaska District
U.S. Army Corps of Engineer
P.O. Box 898
Anchorage, Alaska 99506

RE: Preliminary Comments on the Northeast Cape Draft Work Plan, 2000 Remedial Investigation/Feasibility Study

Dear Mr. Jackson:

The Alaska Department of Environmental Conservation (DEC) is concerned about the limited schedule for review and implementation of the subject document. The Work Plan was received at our office August 10, 2000. This Remedial Investigation/Feasibility Study (RI/FS) is an important part of the cleanup process at Northeast Cape and should include a thorough review by all interested stakeholders and an adequate review time. The community should have sufficient time to review the document. I mentioned at the June 26th Restoration Advisory Board (RAB) meeting that the DEC would hold a technical briefing for interested community members on the subject work plan. Community interest in this site is high and a technical support meeting should be held before the comment resolution meeting.

A Technical Assistance for Public Participation (TAPP) grant has been requested by the RAB. It seems logical that the RAB have the opportunity to utilize the TAPP grant for this document review, considering the effort that the Corps has invested in community involvement at this FUDS.

Part of the objective of the RI/FS is to gather enough data to perform human health and ecological risk assessments. The Data Quality Objectives (DQOs) for the risk assessments have not been scoped with the DEC. Please plan on scheduling a scoping meeting for the risk assessments. I will include the DEC risk assessor in the discussions. The previous risk assessments will need to be reviewed by our risk assessor prior to the scoping meeting.

The Agency Toxic Substance and Disease Registry (ATSDR) has been involved in a Health Consultation for the Northeast Cape site and has been involved in community discussions on

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contaminant and health issues at the site. ATSDR may have an interest in providing comments on the work plan and may be able to contribute to the development of DQOs for the risk assessments.

The present schedule calls for a comment resolution meeting the day after comments are due. This will not allow time for responses to comments to be prepared, or for the reviewers to have time to go over them. This approach decreases the quality and efficiency of the meeting and does not allow for a consistent written record of the decisions agreed on by the participants.

The above issues suggest that the RI/FS be delayed until the 2001 field season or a phased approach implemented for the RI/FS portion of the cleanup. If a field effort is performed this fall, it should include only those aspects of the job where there is a high confidence that the DQOs will meet ARARs and endpoint goals. The presented schedule does not allow for adequate review time for all the interested stakeholders, or for scoping of the risk assessment DQOs. Performing the investigation without an adequate review will likely require additional investigative work.

The Northeast Cape Site and Saint Lawrence Island have been the focus of additional interest recently. The Governor and Deputy Secretary of State are scheduled to visit the island this week. I believe a National Science Foundation grant was also awarded to Alaska Community Action on Toxins and the subject of study will be Northeast Cape. A thorough RI/FS should make the cleanup of the site easier for the community, COE, ADEC and these additional interests.

Please note that I will be out of the office the weeks of August 21 and September 4th, so will not be available for the comment resolution meeting as scheduled. Please contact me at 269-3053, so we can discuss the schedule for this work plan.

Sincerely,

Jeff Brownlee
Environmental Specialist

CC: will include all the RAB members listed on the document distrib. list, ATSDR, Jerry Reichlan and ACAT (Pam Miller).