

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM**

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File # 475.38.013

March 24, 2005

U.S. Army Engineer District, Alaska
Attn: Carey Cossaboom
P.O. Box 6898
Anchorage, AK 99506-6898

RE: ADEC Comments of the Phase IV Investigation, Northeast Cape, St. Lawrence Island, Alaska

Dear Mr. Cossaboom:

Thank you for providing a copy of the subject document for department review. We received it on March 18, 2005. The report is well written and organized and the data gathered should contribute valuable information to the Feasibility Study. The main item I see that would make reviewing the report easier is including sample results over action levels on the figures. This is not a comment that is critical for the final version of the report as it would take some effort to change, and all the data can be gathered from the tables. The biogenic evaluation of the petroleum analysis was helpful. Some specific comments on the report:

- 1.) Section 3.2; please explain how human waste was handled at the temporary camp.
- 2.) Section 5.6; please note if stained soils or evidence of soil disturbance were observed at this site.
- 3.) Table 5-7b, c; in my version of the report both these tables seem to be identical. Please check.
- 4.) Section 5.11.3; please note in the text if the three wells with poor recovery that weren't sampled showed any coincidental evidence of contamination (odor, sheen).
- 5.) Table 5-16b; several sediment samples show somewhat elevated benzene concentrations, yet the petroleum fraction in the analysis appears to be biogenic. Please hypothesize on the origin of the benzene.
- 6.) Please include the lab analyticals in the final, preferably on CD.
- 7.) Please note it appears that surface soils at some of the known PCB areas at the Main Operation Complex were regraded. This could present a challenge during future work. It may be worth discussing with the previous contractor to see if these known PCB areas were excluded from grading as was discussed in comments on the 2003 workplan.

If you have any questions concerning these comments or would like to meet to discuss them, please contact me at 269-3053.

Sincerely,



Jeff Brownlee
Environmental Specialist

CC: Lisa Giest, USACE, via email
Loretta Downs, USACE, via email

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