

STATE OF ALASKA

SARAH PALIN, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-3053
FAX: (907) 269-7649
www.dec.state.ak.us

File: 475.38.013

January 14, 2009

Mr. Carey Cossaboom
U.S. Army Engineer District, Alaska
Mail Code CEPOA-PM-P
P.O. Box 6898
Elmendorf AFB, Alaska 99506-6898

Re: ADEC Comments on the Northeast Cape Site 7 Decision Document

Dear Carey:

Contaminated Sites management and I have completed review of the document titled *Decision Document, Site 7 Cargo Beach Road Landfill, Containerized Hazardous, Toxic, and Radioactive Waste (HTRW) Project # F10AK096905, Northeast Cape Formerly Used Defense Site (FUDS) Saint Lawrence Island Alaska*. We received the document in September, 2008. Below are our comments:

1. Section 1.2: A sentence in the third paragraph states "The removal of drums that may contain..." Drums are known to be in the landfill that contain petroleum product. Please delete "may contain".
2. Section 1.4: Please provide more detail on the intrusive investigation. 50 cubic yards of impacted soil and 50 fluid filled drums seem like low estimates. Please explain the plans for dealing with other encountered hazardous waste such as PCBs, batteries, capacitors, ballasts, transformers, or asbestos. There should be adequate provisions for screening, characterizing and segregating various waste streams. A strategy should be proposed to minimize possible secondary contamination from what is brought up from the excavations and minimize tracking of impacted soils and materials.
3. Section 1.5: The last paragraph in this section says that periodic reviews are not necessary for petroleum only sites. This site is a landfill and landfills are typically required to have monitoring to ensure cap integrity and monitor for contaminant migration. Please delete this text.
4. Section 2.5: The scope and role of the response action should also include adequate capping to mitigate any surface exposure pathways of contaminants and surface debris removal to lessen safety concerns of travelers in the area. Please add.
5. Section 2.6.4: I have always heard the figure of 180,000-gallons for the spill from the AST. Is there a reference for the 30,000-gallon figure? I haven't heard that marine subsistence harvests have dropped off since the spill. I thought subsistence harvest from the Suqi River dropped or ended since the spill.

6. Section 2.6.6, 3rd paragraph: What were the results for the PCB screening samples that were over 1 mg/kg?
7. Tables on page 25: Please add a table for sediment data.
8. Section 2.7.2: Please explain here or on page 25 about 18 AAC 75.350 groundwater determination criteria and how it applies to Site 7. The reader should know that the groundwater use determination is controlled by regulation and requires institutional controls (ICs).
9. Section 2.7.2: The past groundwater use at the facility should be described and how the groundwater at Site 7 differs. Information from the third paragraph should be included in Section 2.8.1.
10. Section 2.7.2: In the last paragraph mention that ICs will be developed for this and other areas on the facility to inform about and control groundwater use.
11. Section 2.8.1: Please delete the last sentence in the 5th paragraph (risk management decision).
12. Section 2.8.1, last paragraph: What depth was the sample with 1.78 mg/kg PCB? Is this area planned for additional soil cover?
13. Table 7: Please note that the arsenic cleanup level was derived from a site specific background study. Explain in the text that the other cleanup levels were derived from a site specific risk assessment. Please footnote the cleanup levels and list the basis for each. Surface water – add the “no sheen” criteria.
14. Section 2.9, Page 32, Surface Water: Please add “no sheen” criteria.
15. Section 2.10.2: Alternative 2 should also describe IC’s on groundwater use as a drinking water source along with documenting the location of the landfill and cautioning against excavation or construction within the boundaries.
16. Section 2.10.3: Please change to “Monitored Natural Attenuation”.
17. Section 2.10.6: This alternative appears to be complete removal. We should have an alternative for removing the drums containing waste.
18. Section 2.10.5: Please specify the depth of the cap. Solid waste regulations stipulate at least 2-feet.
19. Section 2.11.9: Please explain how the COE evaluated and addressed community concerns.
20. Section 2.13: Please add ICs to the selected remedy
21. Section 2.13.1: The selected remedy should be alternative 5 and 2 along with removal of drums containing wastes. Periodic reviews will be conducted more than once. Please change the text in the second paragraph. IC’s should be discussed in more detail including groundwater controls, and a landfill boundary map and associated restrictions with the landfill. Five year reviews should be discussed in relation to the broader HTRW project.
22. Section 2.13.2: Please add characterization of drum contents and any soil suspected of being contaminated.
23. Table 11: Table 10 lists Land Use Control Costs at \$480,000. This table says \$662,000? These costs seem excessive to implement controls for one site. Please clarify and provide supporting information. What is the basis for the estimate of 50 drums with fluid and 50 cubic yards of impacted soil? Please list separate costs for the mobilization, intrusive investigation and capping.
24. Section 2.13.5: Text here says incidental contaminated soils will be removed above cleanup levels which isn’t consistent with bullet 4 in Section 2.13.2.
25. Section 2.13.5, State Acceptance: Please add ICs to the selected remedy.
26. Section 2.13.5, significant changes: The drum removal and investigation should be a significant change. Please add.

If you have any questions regarding this letter, please contact me at 269-3053.

Sincerely,

A handwritten signature in black ink, appearing to read 'JBR', with a stylized, cursive flourish extending to the right.

Jeff Brownlee
Environmental Program Specialist

Copy: Lisa Geist, COE - Anchorage