

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

**SARAH PALIN, GOVERNOR**

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Anchorage, AK 99501  
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File: 475.38.013

June 22, 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: Work plan approval for the Northeast Cape Chemical Oxidation and  
Intrusive Drum Removal/Landfill Cap

Dear Carey:

I have completed review of the work plan documents titled, *In-situ Chemical Oxidation and Intrusive Drum Removal/Landfill Cap Northeast Cape, Saint Lawrence Island Alaska*. We received the document on May 18, 2009. The work plans meet the substantive requirements of the site cleanup rules and are conditionally approved pending the decision documents being signed so we can ensure consistency. The wastewater general permit and variance request are approved. Please address the following comments prior to issuing a final work plan.

1. Section 4.2.7: Please define "severely stained soil" as that soil to be removed will be agreed to with the COE Quality Assurance Representative.
2. Section 4.2.11: In the event the cap is not completed to 24 inches do to a lack of borrow material budget, clarify if the top six inches of higher fines will be stockpiled to be placed later.
3. Section 4.3.5: Please clarify how PCB soils will be discovered. Is screening planned?
4. Insitu Chemical Oxidation work plan, Table 1: There is an alternative cleanup level for RRO at 9,200 mg/kg and I believe there is one for GRO but I'm not sure of the number. Please double check.
5. ISCO work plan, general: Please discuss the overall statistical uncertainty of post injection soil sampling.
6. ISCO, Section 3.6.3: Specify the number of borings and samples and distances from original borings that the post injection sampling will be performed (add more detail).

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Brownlee', written in a cursive style.

Jeff Brownlee  
Environmental Program Specialist

Copy: Lisa Geist, COE - Anchorage  
Molly Welker, Bristol Environmental, Anchorage  
John Halverson, ADEC, Anchorage