

STATE OF ALASKA

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

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March 23, 2010

Carey Cossaboom
USACE; Environmental Engineering Branch
P.O. Box 6898
Elmendorf AFB, AK 99506-0898

Re: ADEC Comments to January 2010 Draft "Site 7 Landfill Cap
Construction Completion Report

Dear Mr. Cossaboom,

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites program has completed its review of the Site 7 Landfill Cap Construction Completion Draft Report. Please see my comments stated below.

1. Page ES-3, line 1: replace the word 'product-filled' with [drums that contained wastes].
2. Page ES-3, line 7:
Insert the word revegetated: 'Capped, graded, and [revegetated] ...'
3. Section 1.0, Page 1, line 7: Reword the phrase 'removal of liquid- filled drums'. Drum removal was not limited to 'filled'.
4. Section 4.1.2, Page 16, lines 6-8: Was there any characterization of the 'non-liquid sludge' before replacing the wiped drums back into the landfill (either from the drums or the pads)? And, what was the fate of the absorbent pads used to wipe the drums?
5. Section 4.1.2, Page 16, Lines 18-26: Please describe the volume of wastewater that was treated and discharged on-site and verify whether the discharge standards were met. Please include a copy of the permit in the final report.
6. Section 5.3.8, Page 31, lines 15-16: Was there sampling/characterization of oil/product separated from the water?
7. Section 5.3.10, Page 32: In regards to removal of additional waste streams, the Record of Decision dated June 2009, table 5 p. 33, lists specific soil cleanup levels which relate to the stated Removal Action Objectives; specifically: "A secondary objective is preventing migration of contaminants in soils to adjacent surface waters." Why was no sampling/characterization conducted for the soil/material that was not removed/left

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- behind in the landfill; particularly lead and PCB's in regards to the additional waste streams encountered?
8. Section 5.4.1, Page 33: Please describe handling and disposal actions regarding wastes from drums that screened as <1000ppm using Chlor-D-Tech as well as those that screened as >1000ppm chlor. The heading of this section is Waste Characterization and disposal, however the text only describes field screening, does not include details on laboratory analysis, and does not describe disposal.
 9. Section 5.4 General: The section should clearly describe all screening, sampling, segregation and disposal of wastes described in the section.
 10. Section 5.6.4, Page 36, line 22: Delete the word 'final'... (or was there more than one seed application?)
 11. Section 5.6.4, Page 36, lines 22-26: Rearrange wording to read: 'The landfill cap was revegetated based on recommendations provided by the Alaska Plant Materials Center. The seed mixture consisted of two different native grass species, both of which are adapted to the St. Lawrence Island environment. The seed mixture was proportioned by weight as presented in Table 5-2.'
 - 10a. Section 5.6.4, Page 36, lines 23-24: Delete the words '...in accordance with the manufacturer's instructions.' Or, reinsert it on page 37 line 3 '...of one pound per 100 square feet in accordance with the manufacturer's instructions.'
 12. Section 5.6.4, Page 37, line 5: Insert words 'Bristol did not [apply] water [to] seeded areas;...' Replace the word 'completed' with '...seeding was [conducted]...'
 13. Section 5.6.4, Page 37, line 7: Insert words '...[germinated] grass seed [was emerged] and growing on the landfill cap.'
 - 12a. Section 5.6.4, Page 37, line 7: Delete '...had taken root...'
 14. Section 5.10, Page 38: Although Bristol did send ADEC a request for site closure, ADEC responded that the land fill could not be closed until 1) the remedial action report was approved, and, 2) that institutional controls are developed, approved and implemented; and 3) IC's must be coordinated and agreed upon by the USACE, ADEC and the landowner.
 15. Section 5.10, Page 39, lines 1-2: Add the two additional institutional control objectives: 1) to prevent excavation into landfill, and 2) and to maintain the landfill cover.
 16. Section 6.2, Page 43, lines 9-10: Please clarify whether all wastewater generated during the project was processed through the final impound and whether representative samples were collected from the waste stream.
 17. Section 6.6, Page 44: Please insert tables 5-6 and 5-7 into the report.
 18. Section 6.8, Page 45 HWAP Soil Sample Results: Please insert a new figure and table for all sample data listed. Was this stained/contaminated soil addressed further/removed in accordance to the cleanup levels listed in Table 5 of the ROD – please explain; if no why not? Will it be addressed/removed in the future? Wasn't the

- intent of pre- and post sampling at the HWAP to demonstrate that cleanup activities did not cause secondary contamination?
19. Appendix D, Sheet No. C2.1, Notes # 1: Replace the word 'trash' with [solid waste/fill material]
 20. Appendix D, Sheet No. C2.1, Notes # 2: Is 'minimum' the intention here instead of maximum?
 21. Data Tables 1-6: Please insert all data tables, including applicable cleanup levels, discharge levels or action levels, and references thereto, into all appropriate and applicable narrative sections of the report.
 22. Table 5: Why are results for PCB's and 6020 metals reported in mg/kg in oil instead of micrograms/L.
 23. Regulatory Permits and Documentation of Reported Spill: Please insert/include all pertinent paperwork and documentation regarding all required permits.
 24. Potential Data Gaps regarding ROD cleanup levels and failure to sample remaining soils/material prior to capping the landfill:
 - 24a. Bulk soil waste characterization data listed on table 6 of the construction report lists no analysis data for Residual Range Organics; although soil cleanup levels stated in Table 5 of the ROD are 9,200 for RRO. Was RRO analysis conducted? If so please amend data table - if not please explain.
 - 24b. Bulk soil waste characterization data listed on table 6 states a DRO exceedance in sample NC007BW02 of 11,000 mg/kg; while analysis of two other bulk soil waste samples NC007BW06 and NC007BW08 (from two different containers) were characterized at 9,200 and 8,600 mg/kg respectively (ROD states a DRO cleanup level of 9,200 mg/kg). Why was the remaining landfill material not sampled/characterized for the purpose of verifying cleanup levels were achieved and documenting what remains on-site?

If you have any questions regarding this letter, please contact me at 907.269.3053 or Curtis.dunkin@alaska.gov.

Sincerely,



Curtis Dunkin
Environmental Program Specialist

Copy: Lisa Geist, COE - Anchorage
Molly Welker, Bristol Environmental, Anchorage
John Halverson, ADEC, Anchorage (via email)