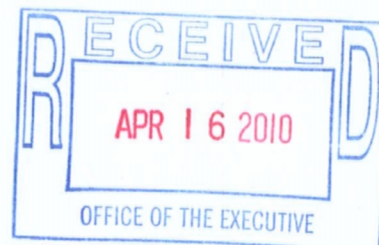




REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898

APR 9 2010



NGCSF 1.1.1
4/9/2010

Programs and Project Management Division
Environmental Special Projects

Mr. Dan Opalski, Director
Office of Environmental Cleanup
Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

Dear Mr. Opalski:

We received a letter from the EPA Regional Administrator, Dennis J. McLerran, dated March 23, 2010. Mr. McLerran requested that we respond to you on three specific points regarding the USACE Formerly Used Defense Sites (FUDS) on St. Lawrence Island, Alaska.

The Alaska Community Action on Toxics (ACAT) group has been involved for many years with FUDS projects on St. Lawrence Island, specifically our Gambell and Northeast Cape Projects. ACAT has consulted with the two Tribal IRA Councils in Gambell and Savoonga, and they appear to have a great deal of influence with the Tribal leaders.

We understand the need to be responsive to Tribal concerns. We recognize the trust responsibility we have for the Tribes and the open dialogue we must maintain with their chosen advisors. We welcome your inquiries and are pleased to provide the information requested in EPA's March 23 letter.

The following paragraphs are the USACE Alaska District's responses to the 10 bulleted issues ACAT presented in their November 11, 2009, letter to the EPA. These are the same issues that ACAT sent by letter November 4, 2010, to USACE Headquarters (Mr. Stacey Hirata) in Washington, D.C.

- *Complete removal of the solid and hazardous waste materials at the Northeast Cape Site 7 landfill*

We believe that the excavations and capping of the Site 7 landfill accomplished during the summer of 2009 removed the contamination sources from this site. Previous investigations indicated that little if any leachate migrates from the landfill, and the groundwater results were

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essentially clean. The effort completed this past summer exceeded our expectations. Drum removal was extremely thorough, batteries and PCB-ballasts were completely removed, and 50 tons of visibly-stained soils were removed. Based on the completed cleanup efforts and new cap, we are confident Site 7 meets protective health-based standards.

- *Removal and treatment of the White Alice site soils and groundwater to effectively remove associated contaminants*

Removal of remaining PCB-contaminated soils at the White Alice Site is planned for 2010. The groundwater near the former White Alice site is not contaminated.

- *Removal/remediation of contaminants in the Northeast Cape Main Complex soils and groundwater, as well as on-going monitoring to ensure safe drinking water supplies*

Removal of PCB-contaminated soils at the Main Operations Complex is scheduled for 2010. Cleanup of the petroleum-contaminated soils at the Main Operations Complex is planned for 2011. We tested chemical oxidation techniques for both soil and groundwater in 2009 (at the advice of the Restoration Advisory Board (RAB) meetings). However, it does not appear that the oxidation techniques will be effective in the peat-rich soils that are petroleum contaminated at the northern edge of the Main Operations Complex. Since chemical oxidation processes were not successful, the contingency approach of soil excavation will be implemented. Our remediation objective remains the same: cleanup of petroleum contaminated soils (maximum depth of 15 feet, as required for future unrestricted use), to meet the site-specific, risk-based cleanup levels approved by the Alaska Department of Environmental Conservation and specified in our approved Decision Document. After source removal is completed, monitored natural attenuation of the groundwater will be implemented. The Main Operations Complex should not be considered a good source for drinking water in the near future. A restriction on installing a drinking water source within the contaminated zone of the Main Complex should be made unless future data confirms cleanup levels are achieved. Clean sources of groundwater for a future community exist up gradient from the Main Operations Complex.

- *Effective remediation and long term monitoring of the Suqi River drainage basin sediments and surface water (fuels and PCB contamination)*

Testing conducted by USACE has demonstrated that the Suqi River drainage basin does not exhibit significant levels of contamination in sediments, except near the Main Operations Complex. The approved Decision Document includes a plan to excavate the contaminated sediments immediately adjacent to the Main Complex and a portion of the narrow down-gradient channel.

- *Complete removal or destruction of the contaminants identified at the former village site at Northeast Cape*

The former village site at Northeast Cape was not a DoD facility and is, therefore, not eligible under the FUDS program. The DoD has shown a willingness to assess conditions at the former village site under the Native American Lands Environmental Mitigation Program (NALEMP).

- *Restoration of the Suqi River watershed and shallow groundwater resources within the area of the Main Complex and upgradient regions of the Main Complex to ensure adequate and safe drinking water at Northeast Cape*

Cleanup of contamination sources at the Main Operations Complex and the sediments in the nearby Drainage Basin will significantly improve the overall Suqi River watershed. We believe that our remediation efforts will improve the shallow groundwater at Northeast Cape, but we acknowledge that groundwater in the Main Operations Complex will not be suitable as potable water in the near future. However, the groundwater just up gradient of the Main Operations Complex is not contaminated and would be a suitable place for a potable water well that could serve a future community.

- *Removal of contaminant sources at the Village in Gambell including those up-gradient from the municipal water supplies and those beneath the residential areas, the school and community buildings*

USACE conducted active investigation and cleanup efforts in Gambell between 1994 and 2006. All known, eligible military sources of contaminants were removed. The State of Alaska Department of Environmental Conservation approved the investigation and cleanup reports and concurred that no further action is necessary at the site. Debris was cleared from beneath the school during its construction and moved to Site 8C near the city landfill. The NALEMP project removed the military debris material during the summers of 2008-09. We have heard reports that some houses were built on top of scrap wastes. Based on previous debris removal efforts, we have found that only rarely does buried debris in Gambell contain contamination. The NALEMP crew will address concerns about debris beneath residential areas as close as practical, but we cannot justify moving buildings to access debris that is not a source of contamination. The remaining buried debris does not constitute a health hazard or endangerment and is therefore not eligible under the FUDS program. The DoD continues to work with the Native Village of Gambell through NALEMP to assess conditions and cleanup additional military impacts or debris. This NALEMP project is run by the Tribe, and as such, they are responsible for mitigating environmental hazards associated with this buried debris.

- *Long term, bi-annual monitoring of contaminants of concern within the municipal water supply areas*

To our knowledge, the drinking water source in Gambell has never been compromised by activities attributed to the Department of Defense. One monitoring well cross-gradient from the community well showed fuel contamination in the past, but subsequent investigations demonstrated no significant contamination remains. To our knowledge, the community well in Gambell has never been contaminated except for one act of juvenile vandalism.

- *Establishment of a safe drinking water source at Gambell that is up-gradient of the contaminated sites*

The drinking water source in Gambell has not been compromised by activities attributed to the Department of Defense. Therefore, the DoD is not responsible for creating a new water source in Gambell.

- *Institute the tribes as official signatories/Parties to any Records of Decision (RODs)*

The Corps cannot seek tribal signatures on Records of Decision because the tribe does not have jurisdiction over the land itself. CERCLA (Comprehensive Environmental Response, Compensation and Liability Act of 1980) regulations (see 40 CFR 300.515) require that Indian tribes have jurisdiction over the site in order to be afforded substantially the same treatment as states. However, the State of Alaska maintains jurisdictional authority over territory other than Native allotments or other lands set aside under the superintendence of the federal government. Therefore, it would not be appropriate to request Tribal signatures on Decision Documents.

According to FUDS Program Policy (ER 200-3-1, May 2004), the Department of the Army, Assistant Chief of Staff for Installation Management (ACSIM) is the approval authority for all decision documents that have a selected remedy with a present worth cost estimate of more than \$10 million. Lt General Robert Wilson approved the overall cleanup plans (Decision Document) for the Northeast Cape Air Force Station FUDS on 3 September 2009.

The EPA March 23 letter requested us to provide a summary of site investigation and cleanup activities performed to date as well as future plans. We have enclosed two Project Closeout Reports (HTRW and CON/HTRW) for our Gambell Project and two Decision Documents for our Northeast Cape Project to summarize work completed on these projects.

As mentioned earlier, environmental remediation efforts under the FUDS program at Gambell have been completed. However, environmental mitigation efforts continue in Gambell under the DoD-funded NALEMP. NALEMP eligibility requirements are more liberal than FUDS criteria; buried debris in Gambell can be excavated even though it doesn't present an immediate hazard. The NALEMP Strategic Project Implementation Plan (SPIP) is being updated by the Native Village of Gambell's environmental contractor. The SPIP briefly covers the NALEMP history in Gambell from 2003 to present.

The remedial actions outlined in the Northeast Cape Site 7 Cargo Beach Road Landfill CON-HTRW Decision Document at Northeast Cape were completed in 2009. The final Construction Completion Report is pending. Our contractor went above and beyond the stated scope and dug through the entire landfill, removing all drums and stained soils, before placing a new cap on the Site 7 Landfill.

The remedial actions outlined within the Northeast Cape HTRW Decision Document were initiated in 2009 with the chemical oxidation pilot study for the petroleum-contaminated soils at the Main Operations Complex. Unfortunately, layers of peat at this location rendered chem-ox

treatment ineffective. Our Decision Document included a contingency scenario identified as the excavation of soils and monitored natural attenuation of groundwater. The remedial actions outlined in the Decision Document will be implemented starting this field season, and continue over the next several years as funding is available. Long-term monitoring and 5 years reviews will extend beyond 2012.

Another point the EPA March 23 letter requested that we address was to include a list of any waste and contaminants that will remain on St. Lawrence Island after completion of remediation, and the plans for long term monitoring. The following paragraphs address those areas.

Wastes and/or contaminants that are likely to remain behind in Gambell after completion of NALEMP remediation efforts include:

- Some debris, largely consisting of scrap metal, that exists under the city water tank
- Empty former latrine drums beneath the city snow fence
- Debris that is speculated to be beneath the new city housing area
- Scattered .30-caliber ammunition rounds at the bottom of Troutman Lake

No long term monitoring is slated for Gambell.

Wastes and/or contaminants that are likely to remain behind at Northeast Cape after completion of remediation efforts include:

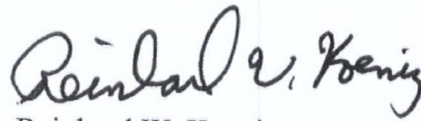
- Petroleum-contaminated soils deeper than 15 feet at the Main Operations Complex
- Petroleum-contaminated groundwater at the Main Operations Complex
- Small residual pockets of petroleum-contaminated soil/sediment within the wetland drainage basin below the Main Operations Complex
- DRO-contaminated soils in wetlands at Site 8 (monitored natural attenuation)
- Non-hazardous solid waste debris beneath the two newly-capped disposal areas (Site 7 and Site 9)

Long-term monitoring will occur at the Main Operations Complex, Site 8, and the Site 7 and Site 9 landfills.

The last area that the EPA March 23 letter requested that we address was to detail our efforts to honor the Government to Government consultation duties. To honor the Government to Government consultation with the Tribal leaderships on St. Lawrence Island, we routinely have our Project Manager meet separately with the Tribal President and IRA Council Members prior to scheduled Restoration Advisory Board (RAB) Meetings. In addition, several former Alaska District Commanders have met with Tribal Leaders in the past, both on St. Lawrence Island and here on Elmendorf Air Force Base. The most recent meetings took place in January 2007 (Col. Wilson traveled to Gambell), April 2006 (Col. Gallagher traveled to Savoonga), and July 2002 (Lt. Col Gingras here at Elmendorf AFB). I also intend to visit St. Lawrence Island this summer.

If you have any remaining questions or concerns, please contact our St. Lawrence Island Project Manager, Mr. Carey Cossaboom, at (907) 753-2689, or by e-mail at carey.c.cossaboom@usace.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "Reinhard W. Koenig". The signature is fluid and cursive, with the first name "Reinhard" being more prominent than the last name "Koenig".

Reinhard W. Koenig
Colonel, Corps of Engineers
District Commander

Enclosures

cc: S. Bainbridge, ADEC
J. Roberts, ADEC
J. Halverson, ADEC
C. Dunkin, ADEC
D. McLerran, EPA

3/31/10 Vi i Pam

PCB out of LF - leaching out
but very low levels

- Bullett
Foundation

Indigenous Foundation -

Study Suqi River - any reporting

grant - NIEHS

- EPA - Dr

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EJ small
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