

# STATE OF ALASKA

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

**SARAH PALIN, GOVERNOR**

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File: 660.38.006

September 11, 2007

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 Gambell NALEMP Cleanup Summary Report

Dear Carey:

I have completed review of the Gambell Native American Lands Environmental Mitigation Program Cleanup Summary Report, Gambell, St. Lawrence Island, Alaska (August 2007). We received the report on August 18, 2007. I also looked over the work plan for the 2007 project which the ADEC received on July 20, 2007. It would be nice to see the work plan earlier in the season, at least a month before field work is planned to start.

The report documents that there was minimal contamination associated with the debris removals during the summer of 2006. I have a few specific comments on the report:

1. Section 2.18: Please clarify how we know that each excavation is completed. Is there screening for metallic debris with a hand held metal detector or is the crew just digging until the debris feathers out? Are the geophysical studies done in 2000 being referred to?
2. Table 19: I ran a 95% upper confidence limit calculation on the lead results for Site 6. Using the Gibbons Method the UCL came in at 288 mg/kg considering the whole excavation as the defined unit. The arsenic results are within what is typically seen for background in the area.
3. Conclusions; Site 21: Please clarify if the buried drums that were found are related to the construction of the new AVEC power plant or were they older drums discovered during excavation activities for the plant. It sounds like a joint effort with the city may be prudent for this site and perhaps a geophysics investigation to identify areas of concern.
4. Appendix C: Please have the contractor complete the ADEC Laboratory Data Review Checklist with submission of data analytical packages. The checklist can be found on our website at <http://www.dec.state.ak.us/spar/guidance.htm#csp>.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'JBH', with a stylized, flowing script.

Jeff Brownlee  
Environmental Program Specialist

CC: Gerald Soonagrook, Gambell NALEMP Program Manager  
Dave Miller, Travis/Peterson Environmental Consulting