JULY 2 4 1995

In-Active Installation Section

Mr. Clint Adler
State of Alaska
Department of Environmental
Conservation
610 University Avenue
Fairbanks, Alaska 99709-3643

Dear Mr. Adler:

The purpose of this letter is to explain how the United States Army Engineering District, Alaska (Alaska District) proposes to handle the Investigative-Derived Waste (IDW) generated during the 1994 Remedial Investigations (RI) at Gambell and Northeast Cape, St. Lawrence Island, Alaska.

During the 1994 RIs cuttings from the installation of monitoring wells and boreholes were placed in polypropylene bulk bags referred to as supersacks and were left on site in accordance with IDW management plan contained in the work plan. The 1994 IDW management plan also states that if laboratory analyses indicate remediation of IDW soils is required, that the soils would be remediated at the same time as the rest of the site. Based on the results from the 1994 investigations the Alaska District proposes the following actions based on the attached IDW Plan and supporting information.

At Gambell there are twenty-three supersacks which were left at ten different sites. Based on the analytical results from the 1994 RI the risk based concentration (RBC) of diesel range organics (DRO) for the Gambell area is 8760 mg/kg (calculations attached). Twenty of the twenty-three supersacks of cuttings have DRO results less than the risk based concentration and maximum total lead concentrations less than 100 mg/kg; the Alaska District proposes to spread the contents of these sacks adjacent to the boring. If the final cleanup level is determined to be something other than the RBC, the site will be remediated as appropriate during the remediation implementation stage.

Analytical results of the soil samples from monitoring well number six (MW-6) indicated that at least one sample had a maximum total lead concentration of 117 mg/kg and DRO concentrations less than 10 mg/kg. The cuttings from this monitoring well are contained in one supersack, located at Site 1B. The Alaska District proposes to sample these cuttings and perform the EPA toxicity characteristic leaching procedure (TCLP) to determine if the cuttings meet the definition of a hazardous waste. If the contents are determined to be a hazardous waste the cuttings will be packaged and sent off-site to an approved disposal facility. If the cuttings do not meet the definition of a hazardous waste then the cuttings will be spread adjacent to the boring.

There are two supersacks of cuttings in the Gambell area which do not have any analytical results for DRO. These sacks are located at Sites 6 and 17. The Alaska District proposes to take samples from these sacks and to obtain analytical DRO results to document the DRO concentrations. However, because each supersack contains less than one (1) cubic yard of material, the Alaska District proposes to spread the contents of these sacks at the sites, irregardless of the analytical results, in

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accordance with the guidance for the Treatment and Disposal of Small Quantities of Soil given in the State of Alaska, Department of Environmental Conservation Guidance Manual for Underground Storage Tank Regulations. The Alaska District believes this guidance is appropriate and relevant to the treatment of soil cuttings from monitoring wells and boreholes. As discussed above, once the cleanup levels for the site have been determined, the site will be remediated as appropriate.

At Northeast Cape there are twenty-one supersacks which were left at eleven different sites. Based on the analytical results from the 1994 RI the risk based concentration of diesel range organics for the Northeast Cape area is also 8760 mg/kg (calculations attached). Sixteen of the twenty-one supersacks of cuttings have DRO results less than the risk based concentration and maximum total lead concentrations less than 100 mg/kg; the Alaska District proposes to spread the contents of these sacks adjacent to the boring. If the final cleanup level is determined to be something other than the risk based concentration, the site will be remediated as appropriate during the remediation implementation stage.

One supersack, located at Site 16, has cuttings from a monitoring well which had at least one soil sample with a maximum total lead concentration of 157 mg/kg. The Alaska District proposes to sample the contents of this sack and perform the TCLP for lead. This supersack will be treated in the same manner as the supersack with a maximum total lead level of 117 mg/kg at Gambell.

Four supersacks, located at Sites 11, 19, 27, and 13, have maximum DRO concentrations which exceed the risk based concentration level for the site. However, as discussed above, each supersack is less than one cubic yard of material and the Alaska District proposes to also spread the contents of these sacks adjacent to the boring in accordance with the Treatment and Disposal of Small Quantities of Soil in the Guidance Manual for Underground Storage Tank Regulations.

Please let me know if you concur with this proposed method for handling of the IDW at Gambell and Northeast Cape, St. Lawrence Island, Alaska. You can contact me at 753-5656 if you have any questions regarding this plan or the 1994 Remedial Investigations at these locations.

Sincerely,

Suzanne Beauchamp

Suzanne Beauchamp
Engineering Manager

CONCUR:
~~JRB Baker~~
Volz
Vining

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