

**Comments Submitted by Vi Waghiyi For
Proposed Plan for Remedial Action
GAMBELL FUDS SLI July 04 Report**

Pg. 5, Table 1. Soil and Groundwater Cleanup Levels for All Sites and Sites 5 & 12: Why are the Cleanup Levels different for DRO, RRO, Arsenic, Cadmium and Chromium different as noted in Table 1 for All Sites and Sites 5 & 12?

Pg. 9, Site 1A-North Beach, Army Land Area, Investigation Summary: It does not disclose how many soil and groundwater samples were collected in 1994. The one surface soil sample does not seem enough, the geophysical survey boundaries for the landfill are not noted, does this one surface soil sample denotes that is sufficient for the Army landfill?

Pg. 9, Site 1B-North Beach, Air Force Landing Area: Do empty drums/barrels have to be tested to see what they contained?

Pg. 10, Former Military Housing/Operations Burial Site: The discolored gravel, was it sampled?

Pg. 11, Former Military Housing/Operations Burial Site: Investigation Summary: 2nd paragraph, the sample from 1994 that exceeded the screening levels for chromium and lead. Which form of chromium is it? Form VI is a dangerous form of chromium and is very mobile in groundwater and is almost always the result of human releases.

The arsenic levels that exceed the ADEC cleanup level, and that are determined “consistent across sites in Gambell, and do not appear associated w/past military activity” The many sites that are referred to, the “consistent across sites in Gambell”, are they military sites in question? And has samples of arsenic ever been taken for background levels outside of the boundaries of the military bases in Gambell?

Pg. 12, Preferred Alternative: Chromium VI is dangerous, the single chromium exceedance that is considered an outlier, what form is it and have background levels of chromium been sampled outside of military boundaries to determine if the single chromium exceedance is an outlier indeed?

Pg. 12, Preferred Alternative: NFA, The village drinking water source is down gradient of site 2 & 3, warrants further sampling and monitoring.

Pg. 12, Investigation Summary, 3rd paragraph: Are beryllium and tallium (site 3 levels) dangerous?

Pg. 15 Site 4B-Former USAF Radar Station, Investigation Summary: 2nd Paragraph, Do EPA regions have different “risk-based concentrations”? Since we are in Region 10, does this US EPA, Region 3 risk-based concentration apply?

Pg. 16, Site 4B-Former USAF Radar Station, Preferred Alternative: Were off military boundary background samples taken to see if the elevated copper is an isolated occurrence?

Pg. 18, Site 5-Former Tramway Site, Investigation Summary: Since the only evident activity is from the military, and this site is by the Village water supply, the exceeded level of DRO needs to be monitored and addressed.

Pg. 20, Site 6-Military Landfill, Investigation Summary: Have off military boundary background samples of metals been taken to determine that the levels of metals are naturally occurring?

Pg. 21, Site 7-Former Military Power Facility, Investigation Summary, 4th paragraph: Since this site is by the Gambell School and the DRO and benzene results exceed the ADEC Table C groundwater cleanup levels, this site needs to be addressed. Benzene is a long term contaminant in groundwater, it cannot readily evaporate underground and since little microbial activity occurs in underground water, it is not degraded.

Pg. 27, Site 12, North Nayvaghat Lakes Disposal Site, Investigation Summary, 2nd paragraph: The background levels for groundwater and surface water taken from MW-14 located at the base of Sevoukuk Mt. are from Site 5, so therefore NOT BACKGROUND.

Pg. 32, Site 22-Former CAA Housing, Preferred Alternative: Since the housing has the possibility that asbestos-containing materials may be present in the structures, this site needs to be addressed to determine if the buildings do indeed pose a risk to the occupants or local resident owners, they have a right to know!!

Pg. 34, Site 26-Possible Debris Burial Site: Since this site is by the Gambell School, it warrants cleanup since Local residents reported finding metal debris, machinery, oily debris, and TRANSFORMERS in the vicinity, NFA is not an option due to the risk associated with the site.

Pg. 35, Site 28-Disturbed Ground, Site Description: The Army's use of the land leased January 1955 to May 1958 needs to be determined, the community has a right to know if it poses a risk!

Until credible samples of background arsenic levels are collected outside of the military boundaries in Gambell, Sites 1A, 1B, 2, 6, 7, 9, 12, 13, 16, 17, 18, 25A, 26 and 28 need to be taken off of "Preferred remedial alternatives NFA" proposed plans until if indeed the arsenic levels are not associated w/past military activity.

Are the following sites with buried debris scoped under NALEMP and will be removed?
Sites 1A, 1B, 1C, 2, 3, 11, 13, 14, 15, 16, 17, 18, 21, 23 & 24.

Sites 3, 4A, 4B, 5, and any other site that had samples that initially had elevated levels and are a risk to human health and the environment, and after additional samples were taken a year or years later, the results showed decreased levels, goes to show that the communities knowledge that the groundwater migrates and as a result the differences in the contaminant levels needs to addressed and long term monitoring are warranted and must remediate and cleanup the contaminants when concentration levels are above risk to human health and the environmentl

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