

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

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December 21, 2004

U.S. Army Engineer District, Alaska
Attn: Carey Cossaboom
P.O. Box 6898
Anchorage, AK 99506-6898

RE: Draft Decision Document, Gambell Site, St. Lawrence Island, Alaska

Dear Mr. Cossaboom:

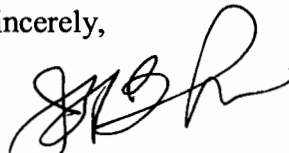
Thank you for providing a copy of the subject document for department review. We received it on November 3, 2004. Typically the draft Record of Decision (ROD) is reviewed by the ADEC project manager then the revised ROD is reviewed with Contaminated Sites management. This ROD had little in the way of structural or substantive comments so management was briefed with the draft copy.

The most significant issue that should be further addressed in the final ROD is the lack of community acceptance of the No Further Action determinations for the majority of sites. Providing a few alternative solutions to perceived problems may help positively influence opinion such as:

- Reiterating the reopen clause in the document in Section 1.10.3.
- Emphasize NALEMP involvement with debris projects and future involvement in the community (as applicable)
- Possible assistance from other agency programs that can address issues that FUDS can not (CAA Housing asbestos with the BIA, Village Safe Water monitoring of the pump well)
- Provide a more formal vehicle for the institutional controls such as a map of buried debris that can be used during future meetings and community construction efforts.

If you have any questions concerning these comments or would like to meet to discuss them, please contact me at 269-3053.

Sincerely,



Jeff Brownlee
Environmental Specialist

**REVIEW
COMMENTS**

PROJECT: Gambell, Alaska

DOCUMENT: Draft Decision Document

LOCATION: Gambell, Saint Lawrence Island, Alaska

U.S. ARMY CORPS OF ENGINEERS CEPOA-EN-EE-TE		DATE: 12/20/04 REVIEWER: Jeff Brownlee (ADEC) PHONE: (907) 269-3053	Action taken on comment by:		
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	MW RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)

1	Declaration Site Name and Location	Please clarify whether the Decision Documents is specific for the individual projects or the entire property. Please note that there are multiple Reckeyes for Gambell in the ADEC database.				
2	Declaration Description of Selected Remedy	In the first sentence please change the "or" to "and" as in "arsenic and lead". With the continued groundwater sampling at Site 5, please explain what will happen if the monitoring wells are clean and what would happen if monitoring well(s) were impacted; NFA or continued sampling rather than open ended. In the last bullet please make a note that the NFA sites have been inspected and/or cleaned up during previous investigations/removal actions. The list of NFA sites looks disturbingly long without some sort of explanation that they have been previously addressed.				
3	Statutory Determinations	The third sentence in this section seems out of place. The sentence seems to be referring to an alternatively considered remedy (in-situ). Please review.				
4	Declaration Signature page – reopen clause	In the first sentence of the last paragraph please add "Formerly Used Defense" between Gambell and Site. In the Jennifer Roberts signature block please change the "DOD" to "Federal Facilities".				
5	Section 1.2 Site History	In the fifth paragraph, please specify the institutional controls that were implemented and the vehicle used; education with public meetings. Is this ongoing? Is there any land management plan established in the community?				
6	Section 1.2 Site History	In the sixth paragraph four new sites are mentioned. Please reference the source of discovery for these sites (SPIP, TEC Report, etc.) Finding new sites this late in the process could diminish a reader's confidence in the earlier investigative work.				

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7	Community Participation	You may want to mention under the RAB bullet or separately that there was (is) a village liaison available to help community members with accessing technical information and agency communication.			
8	Section 1.5.2	Please note that early maps of the village show a drinking water well in the middle of the old village. This well was abandoned either because of poor water quality (salt water intrusion) or poor water quantity. Either way it may be worth mentioning as supporting evidence for using the ingestion cleanup levels.			
9	Section 1.7.1	In the second sentence, please add "may" before "pose".			
10	Section 1.7.2	The first paragraph mentions a tar-stained area. The third paragraph mentions a rust stained area I believe referring to the same location. Please clarify.			
11	Table 5	Please clarify the Dioxin units. These are usually in parts per trillion. The cleanup level could be referenced as EPA Region 9 Preliminary Remediation Goals for Residential Soil = 39 ppt. Please clarify if there were any post-excavation samples taken in 2001.			
12	Table 10	Please add the arsenic in soil samples that are a concern at Site 7 to this table.			
13	Section 1.7.15	In the second sentence, please add "of" after "Drums".			
14	Section 1.7.32	Please clarify if 18 AAC 75, Table B is the screening level referred to at the end of the second paragraph.			
15	General – Page Breaks	The document may be a bit more presentable to the reader with some negative space between sections, for example between the end of section 1.7.35 and 1.8.			
16	Section 1.8, Sites	The last sentence of the second paragraph states that sites 7 and 12			

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	7 and 12 and general	are available for unrestricted use. These locations and other known debris sites should be documented on a map for use by the community to avoid situations like that which occurred when the high school foundation was excavated. The map could serve as an institutional control with soil management information at those sites where the migration to groundwater cleanup level is not used.			
17	Table 14	Please add another note "c" = Table B – ingestion level and change the note on RRO from b to c. In the short paragraph prior to Table 14, please add "and ingestion" after "groundwater" for "... groundwater and ingestion pathways soil cleanup levels.			
18	Section 1.10.3 Community Acceptance	Please expand on this response. Was the public disagreement primarily from Gambell residents or nonprofit watchdog groups? Was the disagreement centered on the FUDS program not being able address buried debris or are the alternative cleanup levels a difficulty? Alternative solutions toward community acceptance could be discussed such as the previously mentioned buried debris map, the use of NALEMP to address some of the debris problems and the possibility of BIA participation of asbestos problems if any at Site 22 – CAA Housing.			
19	Figures	Please put the Site Vicinity and Site Location Maps toward the front of the document and place the more specific figures at the most applicable sections. One or two higher resolution maps of the individual sites would aid a reader in visualizing the site locations and interactions.			
20	Responsiveness Summary – Scrudato #43	Can the NALEMP program address monitoring well or drinking water well monitoring at Site 5?			