

# 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 14, 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 Site 5 Decision Document

Dear Carey:

Contaminated Sites Management and I have completed review of the Site 5 Decision Document for the Gambell Formerly Used Defense Site on Saint Lawrence Island. We received the document on August 24, 2007.

I have a few specific comments on the document:

1. Page 3, Assessment of Site: Please add a sentence or two that specifically describes Site 5, such as, "Site 5 is the former tramway corridor that provided access to the radar site on top of Sevuokuk Mountain. The site also incorporates the current village water supply well at the base of the mountain and an associated groundwater monitoring well array."
2. Page 3, Description of Selected Remedy: Please change "potential" to "unacceptable" in the second sentence.
3. Page 5, Signature page: In the second paragraph between signatures, please delete "previously undiscovered" in the last sentence. Please add the text "Site 5 will be listed as Conditionally Closed in the DEC Contaminated Sites Database. Soil that contains DRO at concentrations above the migration to groundwater cleanup level (230 mg/kg DRO) should not be moved off-site without prior DEC approval."
4. Page 5: Please change the signature name for the DEC to John Halverson, Department of Defense Cleanup Unit Lead.
5. Page 13, Hydrology: In the second paragraph, please explain the proximity of the drinking water well to Site 5. Is it considered part of the site? Relates back to comment #1.
6. Page 15, Soil: Sum up the justification for not addressing the soil contamination discovered in MW16 in 1994. Put in a sentence or two describing the additional investigation (1998) and several subsequent groundwater sampling events indicate that the DRO impacts were an isolated occurrence and do not appear to be impacting the unconsolidated aquifer.

7. Page 16, Groundwater: Was the 1997 sampling event sampled for VOCs as it was in 1996? Please reference the reports where all the analyses not listed in Table 2 can be found.
8. Page 18, Risk Summary: At the end of the second sentence after "10,250 mg/kg," please add "although some soil contains DRO above the 230 mg/kg migration to groundwater cleanup level, the soil does not pose an unacceptable risk to human..." And merge with the next sentence. In this sentence replace "DRO contamination is de-minimus" with "small".
9. Page 18, last paragraph: In the sentence that starts with "Site 5", please replace "potential" with "unacceptable".
10. Page 19, Last paragraph of Section 5.0: In the second sentence, after  $1 \times 10^5$ , add "for carcinogenic risk and 1.0 for a hazard index".
11. Page 19, Section 6.0: Please change the first sentence to The Corps of Engineers determines No Further Action is appropriate for the Site 5 Tramway.
12. Page 20, State Acceptance: In the last sentence delete "previously undiscovered".
13. Page 20, State Acceptance: Please add the paragraph, "Site 5 will be listed as Conditionally Closed in the DEC Contaminated Sites Database. Soil that contains DRO at concentrations above the migration to groundwater cleanup level (230 mg/kg DRO) should not be moved off-site without prior DEC approval".

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

Sincerely,



Jeff Brownlee  
Environmental Program Specialist