

**Comments on the Proposed Plan for Remedial Action
Gambell Formerly Used Defense Site, St. Lawrence Island, AK**

Reviewed by Pamela Miller, St. Lawrence Island RAB member and
Director of Alaska Community Action on Toxics

August 31, 2004

Thank you for extending the comment period on the Proposed Plan for Remedial Action. However, I remain concerned that residents of St. Lawrence Island (SLI) have not had sufficient opportunity or time to review and formally comment on this document. It is especially critical that people of SLI be given ample opportunity to comment, as this is a critical phase of the CERCLA process. I suggest that the Corps of Engineers provide time at the September 9 RAB meeting for additional public comments from RAB members and other residents on the proposed plan.

The proposed plan for remedial action does not sufficiently respond to community concerns and some suggested courses of action. Particularly, the proposed plan does not provide measures to ensure proper monitoring and protection of the community drinking water source. At least once yearly, water from monitoring wells in and around the vicinity of the community drinking water source should be sampled and analyzed for heavy metals, VOCs, pesticides, and PCBs. During the public meeting, a Gambell resident raised a significant point about the vulnerability of the drinking water source because of the permeability of the gravel substrate and susceptibility to contamination from storm surges and flooding. Contamination can readily migrate in this environment. The sites cannot be viewed as isolated from one another because the potential for cross contamination is high given the permeability of the substrate.

The proposed plan does not include adequate data to justify no further action determinations for all but 4 of the 38 sites. Many of the sites warrant further investigation and cleanup. The document must identify sources of contamination, including thallium, beryllium, arsenic, lead, chromium, VOCs, benzene, fuels, and PCBs. Pesticides should be included among the potential contaminants of concern (including DDT metabolites, mirex, endosulfan, lindane, and other pesticides known to be used during the time of the military occupation) especially since we have reason to assume that DDT and possibly other pesticides were used at the site. Analysis of historical records and interviews with former military personnel should be thoroughly conducted to determine other possible sources of contamination and contaminants of concern. The perception of most community members is that the Corps of Engineers has not adequately investigated reports of buried hazardous materials, including reports of munitions (including grenades and larger caliber UXO). Contamination may pose a hazard to health and safety, yet the concerns of the community have been too easily dismissed. In addition, although the Corps states that buried debris is not subject to remedial action under the FUDs program, the proposed plan must make provisions to remediate debris and other hazardous material should it surface through erosion or frost heaving.

The proposed plan for remedial action must include provisions for sampling of indoor air for volatile organics in the Gambell High School, other community buildings, and homes in the vicinity of the landfill and power facility sites (including sites 6,7, and 17).

Throughout the document, arsenic levels are considered "attributable to background" and not of military source. In some cases, arsenic levels are averaged and no further action is justified based

on an average concentration. This is inappropriate and unjustified. True background levels are not provided. Often arsenic levels exceed ADEC cleanup standards. These sites should be remediated so that arsenic levels are below ADEC cleanup standards.

The document should cite screening levels for all contaminants of concern. Further, it is incorrect to make the assumption that certain data points are simply outliers. For example, the Site 2 sampling in 1994 indicated that levels for lead and chromium exceeded screening levels. 1996 samples were tested for lead only and do not provide a basis for assuming that levels for other contaminants are below the ADEC cleanup threshold. Site 2 requires further investigation and cleanup. The NFA determination is unjustified.

Site 3, p 12. Thallium and beryllium exceeded screening levels and other metals (including mercury and others) have been detected. Results cannot be dismissed as anomalies. This site warrants further investigation and cleanup.

Site 4 A, p 14. Although the document states that no significant volume of contaminated soil remains at the site, elevated levels of contaminants are present. Remedial action should include complete removal of all contaminated soil and coverage/reclamation of the area with clean soils and re-vegetation.

Site 4 B, p 14. The document states that "The concentration of dioxins decreased significantly as a result of removing the soils." However, dioxins and additional contaminants remain at levels of concern. Further removal actions are warranted here because of the potential for downgradient contamination. Dioxin contamination warrants special remedial actions due to the extreme health hazards posed by even low concentrations.

Site 5, p 18. Further action to identify and remove the source of DRO contamination must be taken. Monitoring of water for PAHs, DRO, solvents/VOCs, and PCBs from a close series of monitoring wells in the vicinity of the drinking water source is mandatory.

Site 7, p 21. Benzene sources and other contamination must be remediated at this site, and not just arsenic.

Site 12, p 26. I support the proposed alternative to remove sources of heavy metal contamination. Additional sampling should be done to delineate the full extent of contamination.

Site 14, p 28. Further investigation is necessary to determine whether the plane was carrying hazardous and/or radioactive material.

Cc ADEC
 RAB Members