

United States Army
Corps of Engineers

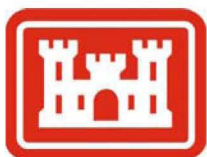
Formerly Used Defense Sites Program

Project Closeout Report

Hazardous, Toxic, and Radioactive Waste (HTRW)
Project # F10AK069603
Gambell FUDS
St. Lawrence Island, Alaska

September 2008

F10AK069603_07.12_0500_a
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Prepared By:
U.S. Army Corps of Engineers - Alaska District
Environmental Engineering Branch
P.O. Box 6898
Elmendorf AFB, Alaska 99506-0898



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REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-0898

October 6, 2009

Environmental Special Programs
Programs and Project Management

«Title» «FirstName» «LastName»
«Company»
«Address1»
«City», «State» «PostalCode»

Dear «Title» «LastName»:

It has come to our attention through Sivuqaq, Inc., based in Gambell, Alaska, that a few statements regarding land usage in Gambell that were written in the HTRW Project Closeout Report (Gambell FUDS) are in error. Errors occur specifically, in Section 2.0 on page 2, within the third paragraph. That third paragraph is hereby corrected by amendment as follows:

The Gambell site was used by the military from 1948 until the late ~~1950's~~1960's. Various facilities were constructed by the U.S. Army and the U.S. Air Force near the village of Gambell to provide housing and operations, aircraft radar, communications, and other functions. The ~~military leased~~Army/Air Force used approximately 2,543 acres in Gambell under Special Use Permits and Public Land Order, ~~of which the U.S. Air Force leased 1,807 acres and the U.S. Army leased the remaining acreage~~. The Air Force built a base camp in 1950 at the foot of Sevuokuk Mountain and a radar site directly above on the mountain top (both abandoned in 1956). The Army occupied several sites during the late 1950s, with a main base camp located just north of Troutman Lake. The Gambell Annex, Gambell Army Site No 1, Gambell Site No 2, and Gambell Army Station were not relinquished to BLM until 1965. The Navy also laid communications cables from the village of Gambell, up Sevuokuk Mountain, and south to Brunnell Cape.

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Please add this letter amendment to the Gambell HTRW Project Closeout Report dated June 2009. If you have any questions, please contact me at (907) 753-2689, or by e-mail at carey.c.cossaboom@usace.army.mil.

Sincerely,



Carey Cossaboom
Project Manager

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LIST OF ACRONYMS

| | |
|--------|--|
| ADEC | Alaska Department of Environmental Conservation |
| BCS | Bristol Construction Services, LLC |
| CERCLA | Comprehensive Environmental Response, Compensation and Liability Act |
| DERP | Defense Environmental Restoration Program |
| EPA | U.S. Environmental Protection Agency |
| DOD | Department of Defense |
| FS | Feasibility Study |
| FUDS | Formerly Used Defense Site |
| HTRW | Hazardous, Toxic, or Radioactive Waste |
| IRA | Indian Restoration Act |
| MW | monitoring well |
| MWH | Montgomery Watson Harza |
| NALEMP | Native American Lands Environmental Mitigation Program |
| NCP | National Oil and Hazardous Substances Pollution Contingency Plan |
| NDAI | No Defense Action Indicated |
| OSCI | Oil Spill Consultants, Inc. |
| PID | photoionization detector |
| POL | petroleum, oil, or lubricants |
| RAB | Restoration Advisory Board |
| USACE | U.S. Army Corps of Engineers |

1.0 STATEMENT OF BASIS

Authority for the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), Hazardous, Toxic, and Radioactive Wastes (HTRW) projects is derived from the Defense Environmental Restoration Program, 10 USC 2701-2707. The Gambell FUDS property number is F10AK0696. The HTRW project number is F10AK069603.

The response was consistent with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the National Oil and Hazardous Substances Pollution Contingency Policy (NCP) and the Defense Environmental Restoration Program (DERP). Under the DERP, HTRW projects include environmental response actions at an area of an eligible FUDS property as the result of Department of Defense (DoD) activities related to hazardous substances, pollutants, and contaminants as defined in CERCLA, petroleum, oil, or lubricants (POL), hazardous wastes or hazardous waste constituents. HTRW restoration activities can involve the cleanup of petroleum in soils or groundwater, even though it may not be subject to regulation under CERCLA, where the Secretary of Defense determines that such activities will result in correction of environmental damage posing imminent and substantial endangerment to the public health or welfare or to the environment.

The decision to closeout this HTRW project is based on the results of a Remedial Investigation, Feasibility Study, implementation of remedial actions as selected in two Decision Documents, and other removal action activities conducted between 1994 and 2006.

2.0 SITE LOCATION AND DESCRIPTION

The Native Village of Gambell is located on St. Lawrence Island, in the western portion of the Bering Sea, approximately 200 air miles southwest of Nome, Alaska (see Figure 1). Gambell is located at latitude 63° 46' 49" North and longitude 171° 43' 46" West. The village is situated on a gravel spit characterized by wave terraced beach areas with an elevation of approximately 30 feet above mean sea level (MSL). Troutman Lake is located south of the village. Sivuqaq Mountain borders the gravel spit and Troutman Lake on the east, rising to an elevation of 619 feet above MSL. St. Lawrence Island is currently owned jointly by Sivuqaq, Inc., in Gambell, Alaska, and the Kikulget, Inc., in Savoonga, Alaska. Non-Native land on St. Lawrence Island is limited to state land used for airstrips and related facilities in Gambell and Savoonga.

The FUDS program has assigned the Gambell site property number # F10AK0696. The HTRW project number for Gambell is #F10AK069603. The State of Alaska, Department of Environmental Conservation (ADEC) tracks the entire site with rekey # 198532X917919, and also lists individual areas of concern by separate rekeys. The United States Environmental Protection Agency (EPA) identification number for Gambell is AKD981765894.

Gambell is inhabited primarily by Native St. Lawrence Island Yupik people, who lead a subsistence-based lifestyle. The population of Gambell has been slowly increasing (2 percent per year growth) since 1990; this trend is expected to continue. U.S. Census data from 2000

reports the total population at 649 residents. Residential development is planned to expand to the east of the Village of Gambell; supporting infrastructure for the village may expand to the south of Troutman Lake. Land use at the Gambell site is residential, recreational, and open space or undeveloped. The recreational and open space lands are primarily used for subsistence hunting, gathering, and eco-tourism.

The Gambell area supports habitat for a variety of seabirds, waterfowl, and mammals that either breed in or visit the area. The area surrounding the top of Sevuokuk Mountain, above the Village of Gambell, supports a large bird rookery. The birds and bird eggs serve as a subsistence food source for local inhabitants. The ocean surrounding the Gambell area is used extensively for subsistence hunting of whales, walrus, seals, sea birds, and fish.

The Gambell site was used by the military from 1948 until the late 1950's. Various facilities were constructed by the U.S. Army and the U.S. Air Force near the village of Gambell to provide housing and operations, aircraft radar, communications, and other functions. The military leased approximately 2,543 acres in Gambell, of which the U.S. Air Force leased 1,807 acres and the U.S. Army leased the remaining acreage. The Air Force built a base camp in 1950 at the foot of Sevuokuk Mountain and a radar site directly above on the mountain top (both abandoned in 1956). The Army occupied several sites during the late 1950s, with a main base camp located just north of Troutman Lake. The Navy also laid communications cables from the village of Gambell, up Sevuokuk Mountain, and south to Brunnell Cape.

3.0 DESCRIPTION OF THE SELECTED REMEDY AND IMPLEMENTATION

This project closure report covers impacts identified as HTRW. A total of 38 sites were identified in Gambell. A remedial response was selected for 37 of these sites under a Decision Document dated June 2005. A decision on Site 5 was postponed until after additional monitoring was conducted in 2005 and 2006. Site 5 was addressed in a Decision Document dated September 2007. No further action was the selected response for 35 of these sites (Table 1). Sites 7 and 12 required excavation of contaminated soil. Site 8A required debris removal. The sites discussed in this document are listed in Table 1 and depicted on Figure 2.

Table 1 – Remedial Responses by Site Location

| Site | Selected Remedial Response |
|---------------------------------|-----------------------------------|
| 1A North Beach | No Further Action |
| 1B Army Landing Area | No Further Action |
| 1C Air Force Landing Area | No Further Action |
| 2 Military Burial Site | No Further Action |
| 3 Communications Facility | No Further Action |
| 4A Air Force Radar Site | No Further Action |
| 4B Former Quonset Huts | No Further Action |
| 4C Discarded Drums | No Further Action |
| 4D Former Transformers | No Further Action |
| 4E Western Face of Sevuokuk Mtn | No Further Action |

| | | |
|-----|-------------------------------|---|
| 5 | Tramway/Water Supply | No Further Action |
| 6 | Military Landfill | No Further Action |
| 7 | Military Power Facility | Excavation and off-site disposal of arsenic-contaminated soil |
| 8A | Marston Matting | Removal and off-site recycling/disposal of exposed metal debris |
| 8B | Buried Debris | No Further Action |
| 8C | Navy Landfill | No Further Action |
| 8D | Beach Ammunition | No Further Action |
| 9 | Asphalt Drums | No Further Action |
| 10 | Army/Air Force Trails | No Further Action |
| 11 | Communication Cable Route | No Further Action |
| 12 | Nayvaghat Lakes Disposal Site | Excavation and off-site disposal of lead-contaminated soil |
| 13 | Radar Power Station | No Further Action |
| 14 | Navy Plane Crash Site | No Further Action |
| 15 | Troutman Lake Disposal Site | No Further Action |
| 16 | Municipal Building Site | No Further Action |
| 17 | Army Landfills | No Further Action |
| 18 | Main Camp | No Further Action |
| 19 | Diatomaceous Earth | No Further Action |
| 20 | Schoolyard | No Further Action |
| 21 | Toe of Sevuokuk Mountain | No Further Action |
| 22 | Former CAA Housing | No Further Action |
| 23 | Debris from High School | No Further Action |
| 24 | South of Municipal Building | No Further Action |
| 25A | Gambell South Housing Units | No Further Action |
| 25B | Low Drainage Area | No Further Action |
| 26 | Possible Debris Burial Site | No Further Action |
| 27 | Drum Storage Area | No Further Action |
| 28 | Disturbed Ground | No Further Action |

The Feasibility Study (USACE, 2004a) documented the processes by which environmental response actions were identified and evaluated for the Gambell site. The Feasibility Study was conducted in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), using the standard evaluation criteria. The study provided information to support an informed risk management decision regarding the most appropriate remedy for each Gambell site.

A series of Remedial Investigations were performed prior to completing the Feasibility Study. During the remedial investigation process, soil, sediment, and shallow-aquifer groundwater were sampled and analyzed for a wide range of organic and inorganic constituents. Contaminants detected in the soil and shallow-aquifer groundwater were primarily fuels and metals.

The selected remedy for the Gambell site was documented in two separate Decision Documents (USACE, 2005 and 2007) and supported by the Administrative Record for the site. This record is available at the Information Repository within the Sivuqaq Lodge in Gambell, Alaska. The debris and contaminated soil excavated per the June 2005 Decision Document was shipped off-Island for recycling or disposal at a permitted landfill. Additional water sampling at Site 5 was conducted during 2005-2006. The results of the water sampling demonstrated that no further action was needed.

3.1 NO DOD ACTION INDICATED (NDAI)

No further Department Defense action indicated was selected as the response for 35 out of the 38 sites because there was no evidence of any remaining environmental hazards at these sites. A detailed summary of the remedial investigation results, removal of debris and hazardous materials, and other previous activities is found in the Decision Documents dated June 2005 and September 2007. Environmental investigations and cleanup activities at Gambell began in the mid 1980's. The first major environmental study, the remedial investigation, was performed at Gambell in 1994. In 1996, the second phase of remedial investigation was performed.

In 1997, a USACE contractor, Montgomery Watson, removed visible surface debris from various sites around Gambell (MW, 1997). During the 1999 field season, Oil Spill Consultants, Inc. (OSCI) performed further cleanup activities in Gambell, including the removal of additional debris exposed by frost jacking after the 1997 cleanup activity (OSCI, 2001). OSCI removed a total of 26.8 tons of hazardous and non-hazardous containerized wastes such as asphalt drums, paint, generators, batteries, empty drums, and transformer carcasses. OSCI also removed 71 tons of exposed metal debris such as runway Martson matting, cable, fuel tanks and equipment parts; and excavated 72 tons of contaminated soil.

A supplemental remedial investigation was conducted by Montgomery Watson Harza during the 2001 field season, to verify previously collected confirmation data and investigate the nature and extent of contamination at four newly identified sites (MWH, 2002). The Corps of Engineers completed a Feasibility Study (FS) in February 2004 (USACE, 2004a). A Proposed Plan was distributed to the public in July 2004 which summarized site conditions, investigation results, and described the remedial alternatives evaluated in the FS (USACE, 2004b).

Thirty two monitoring wells were installed throughout the Gambell FUDS during the remedial investigation. One well (MW26) was removed upon installation in 1994 due to lack of water, a second well (MW23) was not constructed. One well (MW16) was removed between the Phase I and Phase II remedial investigation (1996-1998), a second well (MW24) was removed by MWH during on site removal actions in 2003. Seven wells surrounding Site 5 (MW 14, 15, 28, 29, 30, 31, 32) were decommissioned by Village Safe Water in October 2007. Bristol Environmental Remediation Service, Inc. searched for, removed and properly decommissioned all remaining wells according to ADEC procedures during August 2008 (BERS, 2008). According to field observations, MW5 and MW7 had already been reclaimed by the ocean and were not recoverable. MW25 and MW27 were flush mounted wells in the vicinity of Site 7 and could not be located with a metal detector.

3.1.1 Site 5

A Site 5 Decision Document was approved in September 2007 (USACE, 2007). The selected remedy was no further action. Three additional rounds of well sampling around Site 5 were conducted prior to the selection of the final remedy. There is no unacceptable risk to human

health and the environment caused by the current or future exposure of a resident to contaminated soils or groundwater at Site 5.

Site 5 is located at the base of Sevuokuk Mountain, northeast of Troutman Lake. Site 5 is the former tramway corridor that provided access to the radar site on top of the mountain. The site also incorporates the current village water supply well at the base of the mountain and an associated groundwater monitoring well array.

Groundwater sampling conducted in 1998 at Site 5 indicated the potential for contamination with petroleum (diesel) (MW, 1999a). Subsequent sampling of the monitoring wells surrounding the public water supply was conducted in 1999 (July, October), 2005 (September), and 2006 (July, August). These groundwater sampling events confirmed the aquifer is not contaminated with petroleum hydrocarbons above regulatory cleanup levels. There is no evidence of a spill or source area of contaminated soils. Additional details on the sampling results can be found in the Groundwater Sampling Reports (BCS, 2006a, 2006b, 2007), and the Decision Document (USACE, 2007).

The 7 monitoring wells (MW 14, 15, 28, 29, 30, 31, 32) surrounding Site 5 (see Figure 3) were pulled and decommissioned in October 2007, by personnel with Alaska Village Safe Water Program.

3.2 REMEDIAL ACTIONS COMPLETED

The Decision Document (USACE, 2005) selected a response action for two areas, Sites 7 and 12, based on the presence of contaminants at levels which may pose a risk to human health and the environment. The selected remedy was excavation and off-site disposal of contaminated soils. In addition, removal of exposed Marston matting metallic debris was the selected response action for Site 8A.

3.2.1 Site 7

Site 7 is located north of the Gambell Municipal Building, and west of the Gambell School. A military power facility was reportedly demolished and buried in this location. A military motor pool building was also believed to be located in this vicinity. Montgomery Watson removed all exposed surface debris in 1996. During 2003, MWH removed the concrete pad, underlying support timbers, a buried 55-gallon drum, and 1 cubic yard of incidental contaminated soils (MWH, 2004). Soil confirmation samples collected from beneath the removed concrete pad and support materials indicated arsenic contamination was still present.

A Feasibility Study was completed by USACE in 2004 which evaluated a range of remedial alternatives. A Decision Document (USACE, 2005) selected the final remedy as excavation and off-site disposal of arsenic-contaminated soils at Site 7. During the summer of 2006, Bristol Construction Services (BCS) excavated an area approximately 10 by 20 feet and removed 6.93

tons of arsenic-contaminated soils from Site 7 (see Figure 4). The soil was transported to a permitted disposal facility in Arlington, Oregon. Soil confirmation samples were collected from the base of the excavation and all the results were below the site-specific cleanup level. Additional details regarding the removal action are presented in the Soil and Debris Removal Action Report (BCS 2007b).

3.2.2 Site 8A

Site 8A is located along the eastern edge of the airport runway. The Marston matting at Site 8A was abandoned in place when the military demobilized from the area in the late 1950s. The debris posed a clear danger to local residents who frequently traverse the area on all-terrain vehicles (ATVs) and snowmachines due to the sharp and jagged edges which protrude above the ground surface and create a navigation hazard during the winter. In 1999, OSCI removed some surface debris from Site 8A, including scattered metal, small quantities of wood and concrete, and an exposed layer of Marston matting. However, the planned removal of the Marston matting was not completed because buried electrical lines prevented safe implementation of the field activities.

BCS completed the removal of Marston matting debris and old partially buried drums during the summer of 2006. A total of 58.6 tons of metallic debris was removed and shipped offsite for recycling. Approximately 14 drums were present within a 20 by 20 foot area. The drums were crushed and initially thought to be empty. However upon arrival at the scrap metal recycling facility, it was discovered that some drums had a small amount of residual tar. The drums were properly disposed by General Environmental Management, Inc., in November 2006. Field screening of the soil beneath the drums was conducted using a photoionization detector (PID) and did not indicate the presence of contamination. Three soil confirmation samples were also collected and analyzed for metals, gasoline range organics, diesel range organics, and residual range organics. No contaminants exceeded site cleanup levels. Additional details are presented in the Soil and Debris Removal Action Report (BCS 2007b).

3.2.3 Site 12

Site 12 is located north of Nayvaghat Lakes on the southwest side of an ATV trail. The site is divided into a north and a south area. The area south of Troutman Lake is within the City of Gambell boundary. The area is currently used primarily for recreation, subsistence food gathering, and as a gravel borrow source. However, this site has the potential to be developed for residential use in the future, given the flat topography and close proximity to a new drinking water source.

In 1999, OSCI removed contaminated soil and debris from the site including drums, dried paint, and batteries from large vehicles consistent with former military use (OSCI, 2001). OSCI removed 798 pounds of miscellaneous metal debris; 7,104 pounds of drums; 1,598 pounds of RCRA hazardous materials (lead contaminated soil, lead acid batteries, and lead paint); and

7,237 pounds of petroleum-stained soil associated with the drums.

Soil confirmation samples and a supplemental remedial investigation conducted in 2001 (MWH, 2002) indicated soils remained with chromium and lead contamination. A Feasibility Study was completed by USACE in 2004 which evaluated a range of remedial alternatives. A Decision Document (USACE, 2005) selected the final remedy as excavation and off-site disposal of chromium and lead contaminated soils at Site 12. During the summer of 2006, Bristol Construction Services (BCS) excavated an area approximately 10 by 20 feet and removed 7.0 tons of chromium and lead contaminated soils from Site 12 (see Figure 5). The soil was transported to a permitted disposal facility in Arlington, Oregon. Soil confirmation samples were collected from the base of the excavation and all the results were below the site-specific cleanup level. Additional details regarding the removal action are presented in the Soil and Debris Removal Action Report (BCS, 2007b).

4.0 HIGHLIGHTS OF COMMUNITY PARTICIPATION

The USACE, Alaska District coordinated all community relations activities and ensured that the local community was informed about project-related activities and status by conducting periodic public meetings. A Restoration Advisory Board (RAB) comprised of concerned citizens of Gambell, Savoonga, Nome, and Anchorage was formed in 2000 and continues to meet 2 to 3 times per year. Subsequent RAB meetings¹ were held to update the community on ordnance awareness, hazardous and toxic waste remediation activities in Gambell and Northeast Cape, and other building debris and demolition removal work.

5.0 CONCLUSION

All identified hazardous/toxic/radioactive wastes (HTRW) have been removed from the Gambell FUDS. Contaminated soils were excavated and removed at various locations across the site. All monitoring wells installed during the remedial investigations have been searched for and properly decommissioned to the extent practicable. There is no evidence of any additional hazardous substances based on previous military use of the area. The DoD has completed all necessary remedial actions at the Gambell FUDS. No further DoD actions are necessary at this site.

¹ RAB meetings were held January 15, 2004 (Savoonga); March 31, 2004 (Gambell); September 9, 2004 (Savoonga); February 1, 2005 (Gambell); June 1, 2005 (Savoonga); September 15, 2005 (Gambell); January 25, 2006 (Savoonga); July 18, 2006 (Gambell); January 25, 2007 (Gambell), July 24, 2007 (Savoonga); January 8, 2008 (Savoonga); June 25, 2008 (Savoonga).

6.0 REFERENCES

- Bristol Construction Services, LLC (BCS). 2006a. Groundwater Monitoring Report, Gambell FUDS Remedial Action, Gambell, Alaska. Revision 1. February.
- BCS. 2006b. July 2006 Groundwater Sampling Report. Gambell FUDS Remedial Action, Gambell, Alaska. Revision 1. December.
- BCS. 2007a. August 2006 Groundwater Sampling Report. Gambell FUDS Remedial Investigation, Gambell, Alaska. Final. May.
- BCS. 2007b. Gambell FUDS Remedial Action, Soil and Debris Removal Action Report. Revised Final. September.
- Bristol Environmental Remediation Services, Inc. (BERS). 2008. Technical Memorandum, Monitoring Well Decommissioning Report, Gambell, Alaska. September.
- Montgomery Watson (MW). 1995. Remedial Investigation, Gambell, St. Lawrence Island, Alaska. January.
- MW. 1997. Debris Inventory Update, Gambell, St. Lawrence Island, Alaska. October.
- MW. 1998. Phase II Remedial Investigation, Gambell, St. Lawrence Island. Final. December.
- MW. 1999a. Remedial Investigation, Groundwater Sampling, Site 5, Gambell, St. Lawrence Island, Alaska. March.
- MW. 1999b. Phase II Remedial Investigation, Site 5, Gambell, St. Lawrence Island, Alaska. Final. May.
- MW. 1999c. Remedial Investigation, July 1999 Groundwater Sampling, Site 5, Gambell, St. Lawrence Island, Alaska. December.
- MW. 1999d. Remedial Investigation, October 1999 Groundwater Sampling, Site 5, Gambell, St. Lawrence Island, Alaska. December.
- Montgomery Watson Harza (MWH). 2002. Summary Report, 2001 Supplemental Remedial Investigation, Gambell, St. Lawrence Island, Alaska. Final. May.
- MWH. 2004. Gambell NALEMP Removal Action Report, Gambell, St. Lawrence Island, Alaska. Final. February.
- Native Village of Gambell. 2008. Gambell NALEMP Cleanup Summary Report. Gambell, St. Lawrence Island, Alaska. In association with Travis/Peterson Environmental Consulting, Inc. February.

Oil Spill Consultants, Inc. (OSCI). 2001. Remedial Action Report for Debris Removal and Containerized Hazardous Waste and Toxic Waste Removal, Gambell, Alaska. Final. February 15.

United States Army Corps of Engineers (USACE). 2004a. Feasibility Study, Gambell, St. Lawrence Island, Alaska. February.

USACE. 2004b. Proposed Plan for Remedial Action, Gambell Formerly Used Defense Site, St. Lawrence Island, Alaska. July.

USACE. 2005. Decision Document, Gambell Formerly Used Defense Site F10AK0696, St. Lawrence Island, Alaska. June.

Figure 2. Gambell Sites Overview

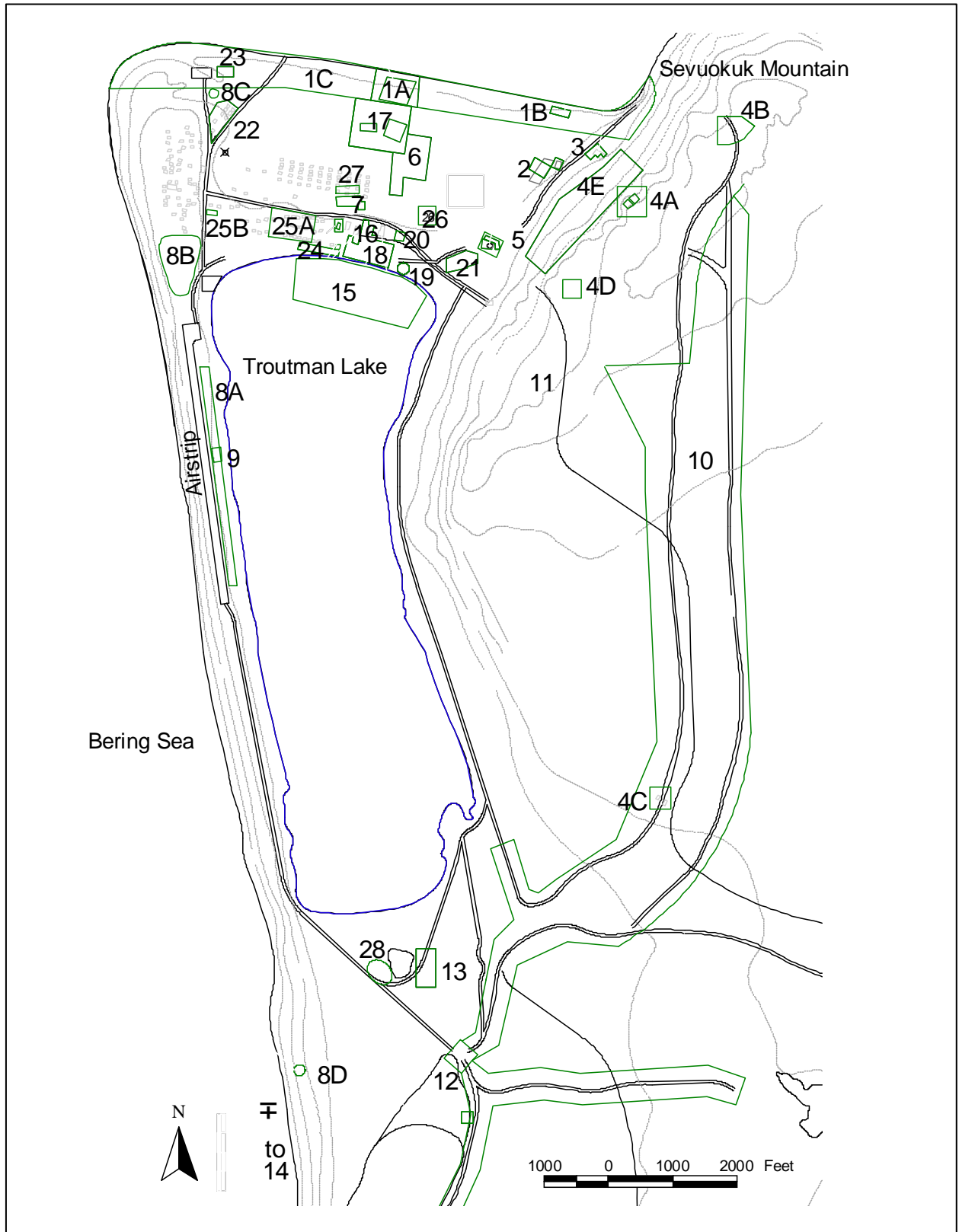
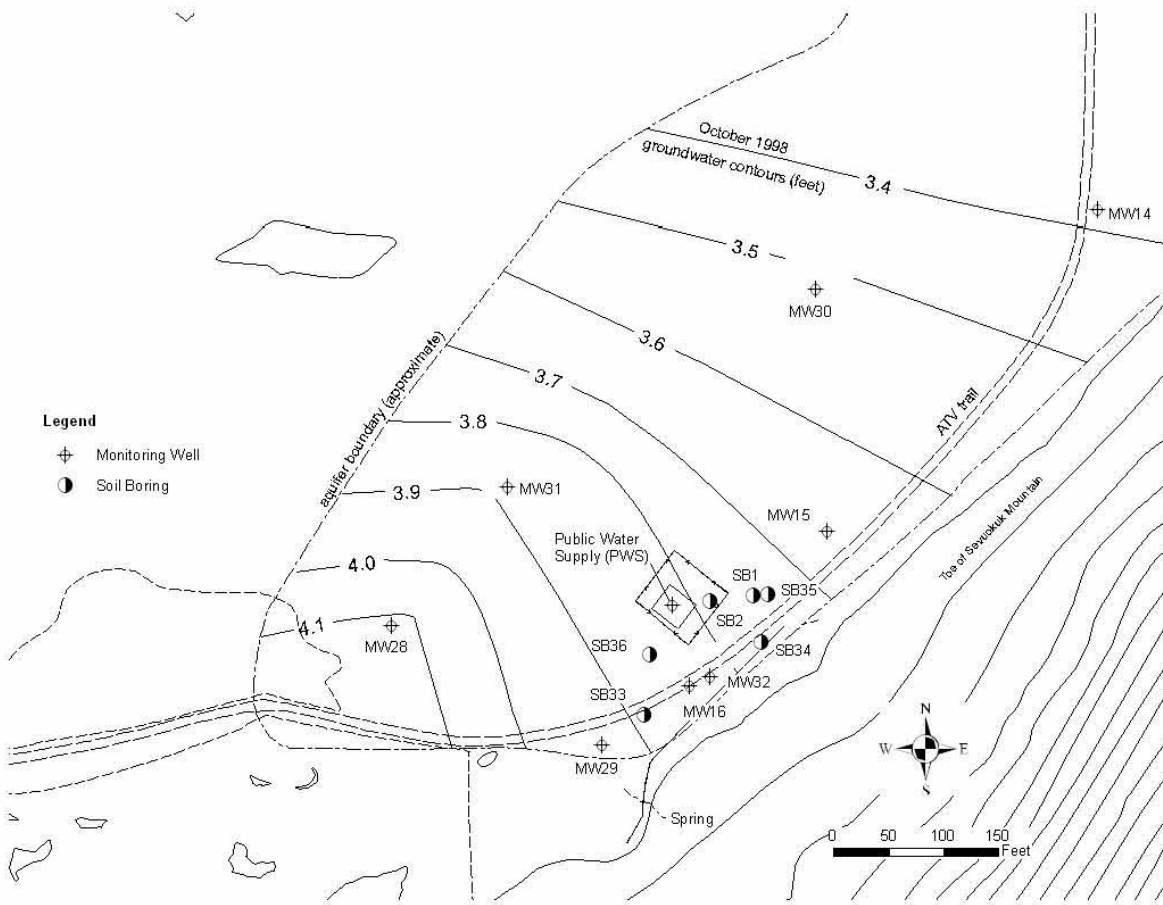


Figure 3. Site 5 Monitoring Well locations



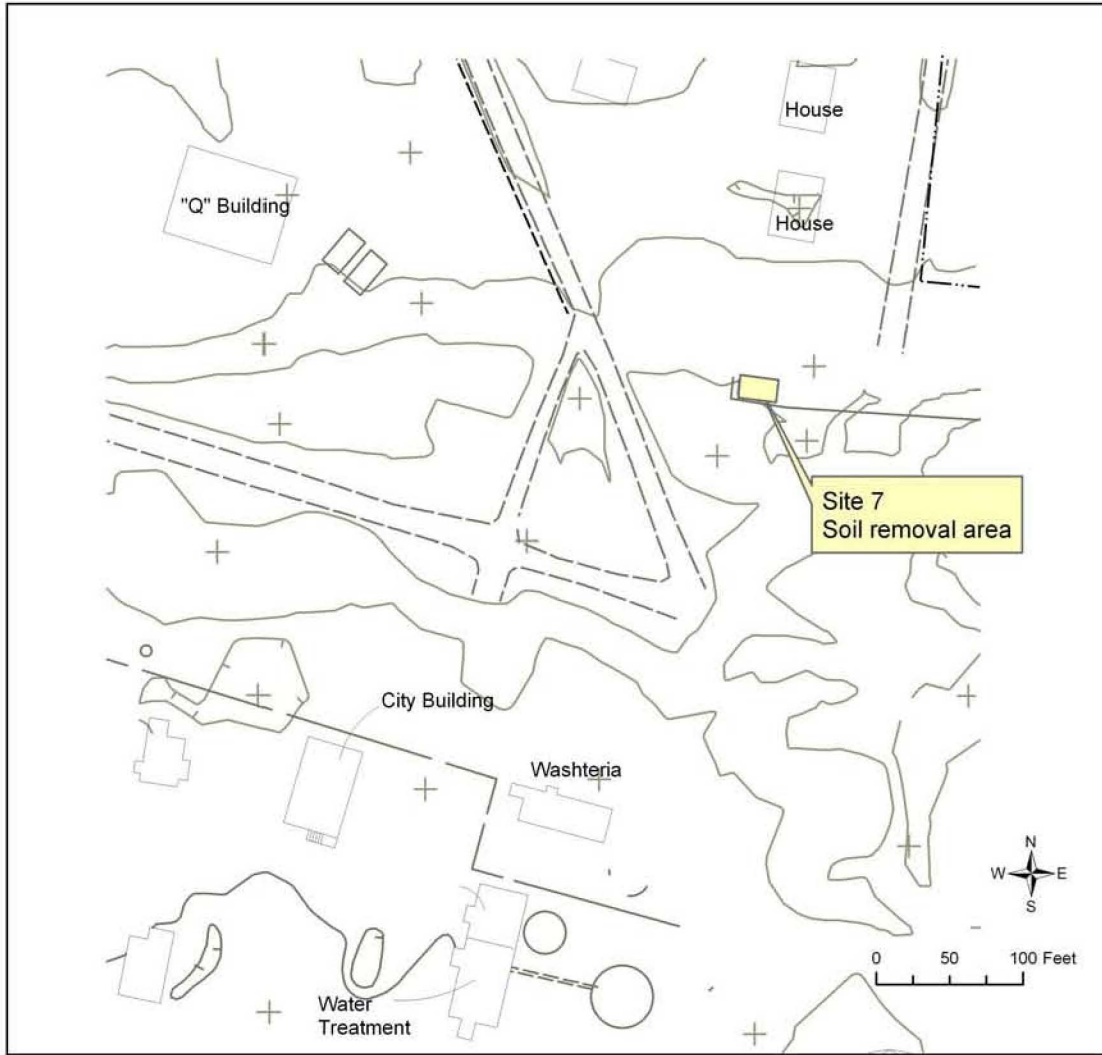


Figure 4. Site 7 Soil Removal Area

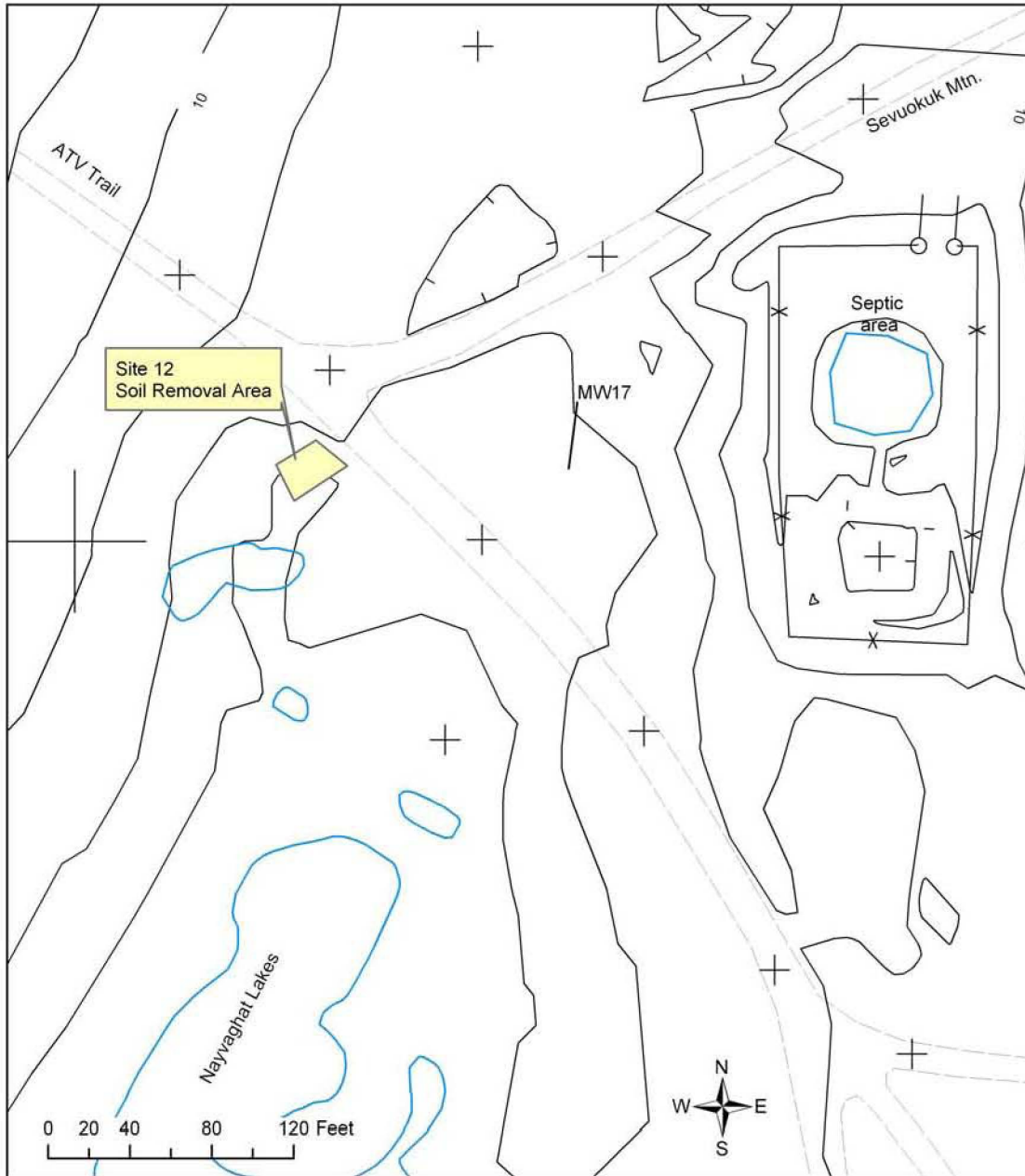


Figure 5. Site 12 Soil Removal Area

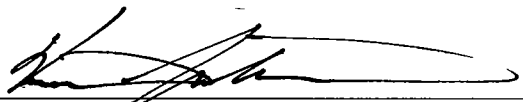
**HTRW Project Closeout
F10AK069603
Gambell Formerly Used Defense Site
St. Lawrence Island, Alaska**

DECLARATION

In accordance with the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), the U.S. Army Corps of Engineers (USACE), Alaska District, has completed all hazardous, toxic, and radioactive waste (HTRW) project activities for the selected remedy at the Gambell Formerly Used Defense Site (FUDS) on St. Lawrence Island (#F10AK069604). Based on the approved Decision Documents (USACE 2005 and 2007), remedial actions were completed to address potential risks for the Gambell site. The Decision Documents identified two areas with the potential for risk based on the presence of metals-contaminated soil. The soil removal actions were completed in 2006. No further actions are required to mitigate risk. The project reports referenced above support the conclusion that all hazardous and toxic waste concerns have been addressed and no further HTRW actions are required for this project.

This project closure document has been prepared and approved by the undersigned in accordance with the FUDS Program Policy, ER 200-3-1, 10 May 2004. If new information becomes available that indicates additional FUDS program eligible impacts occur at the Gambell property, the site may be re-evaluated for HTRW project eligibility.

APPROVED:

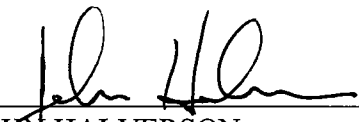


Date 10/15/08

KEVIN J. WILSON
Colonel, Corps of Engineers
District Commander

REVIEW AND CONCURRENCE

The State of Alaska, through the Department of Environmental Conservation concurs with this USACE project closure. The decision may be reviewed and modified in the future if new information becomes available that indicates the presence of previously undiscovered military contamination or exposures that may cause unacceptable risk to human health or the environment.



Date 9/26/08

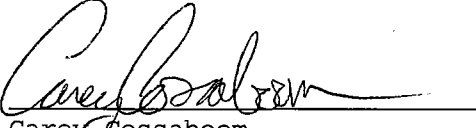
JOHN HALVERSON
Alaska Department of Environmental Conservation
Department of Defense Environmental Program Manager



Alaska District Corps of Engineers Staff / Action Sheet

Please initial concur or non & date

S: 16 OCT 08

| Division | Concur | Non | Date | SUBJECT: | Date: 10/02/08 |
|--------------------|--------------------|-----|----------|--|----------------|
| DC Wilson | <i>[Signature]</i> | | 10/6/08 | Project Closeout Report - Gambell FUDS, HTRW | |
| DDC Stone | <i>[Signature]</i> | | 10-14-08 | | |
| DR Hunt | <i>[Signature]</i> | | 10.12.08 | RECOMMENDATION: Sign/Approve (two copies) | |
| OC Varegal | <i>[Signature]</i> | | 10/6/08 | DISCUSSION: This PCO Report contains a Declaration that all hazardous and toxic waste concerns have been addressed and that no further HTRW actions are required of DoD. The Corps conducted extensive remedial investigations at this site and found only a few sites that needed remediation. Arsenic and lead-contaminated soil was excavated from these sites and hauled off island. Incidental contaminated soil was removed with debris under our former BDDR project. The Alaska Department of Environmental Conservation has concurred with our findings. | |
| ESP Jaeger | <i>[Signature]</i> | | 10/3/08 | | |
| FUDS Andruschko | <i>[Signature]</i> | | 10/2/08 | | |
| EE Kandall | <i>[Signature]</i> | | 10/2/08 | | |
| | | | | APPROVAL AUTHORITY'S COMMENTS: | |
| | | | | Approval ___ Disapproval ___ See Me ___ | |
| | | | |  Carey Cossaboom FUDS Project Manager x2689 | |
| | | | | | |

Div/Branch Chief's Signature

POC: Carey Cossaboom x2689

for Release: Clare L. Jaeger

Phone #: x 2855