

STATE OF ALASKA

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

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File # 475.38.013

September 8, 2006

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 Northeast Cape Feasibility Study

Dear Mr. Cossaboom:

I have completed review of the document title *Feasibility Study, Northeast Cape FUDS, Saint Lawrence Island, Alaska, Draft (June 2006)*. The study is thorough and well written. The DEC received the document on July 7, 2006.

The alternative analysis appears thorough and objective. As you know there will be a number of sites where in choosing the best alternative the cleanup team will end up deciding on a combination approach. For example in the drainage basin it may be best to do limited removal of impacted sediment (Scenario A or B) in combination with monitored natural attenuation and institutional controls. Please discuss this approach in the document so that the reader knows this combination approach is likely to happen or a viable choice. Costs for these combination options will of course then have to be modified.

1. Section 3.1: Please include TSCA in the table for chemical specific ARARs. Please remove the word "Potential" from the table heading.
2. Section 3.1: Please include the "Identification and Listing of Hazardous Waste (40 CFR Part 261; 18 AAC 62) in the ARARs table.
3. Section 3.5: At the end of the first paragraph please briefly explain why lead and the petroleum compounds aren't included in cumulative risk.
4. Section 3.6.3: The DEC doesn't typically endorse alternative cleanup levels for groundwater. It appears that the calculated ACL values are close to or below the published Table C values. Perhaps it would be a cleaner approach to just use Table C.
5. Table 3-6B: Please clarify the use of the aliphatic/aromatic split for groundwater. The DEC has not approved the AA methods. Most of our historic data is in totals.
6. Section 3.6.4: Surface water standards are promulgated in 18 AAC 70. For petroleum the cleanup levels are 10 parts per billion total aromatic hydrocarbons (TAH) and 15 parts per billion total aqueous hydrocarbons (TaqH). Please include.

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7. Table 3-7: We should discuss the sediment cleanup levels. It will be difficult to justify using numbers above the NOAA screening tables, Probable Effects Level (PEL) as the cleanup criteria for sediment especially for PCBs. Please clarify the use of the Washington State criteria. Are these levels adjusted for carbon?
8. Section 8.0: Please clarify if there will be an interim action to address the screening for and removal/disposal of possible additional drums of product in the landfill. We could also include a screening process in the selected alternative to be implemented at a later date.
9. Section 8.0: Please note depending on the selected remedy for the Landfill 7 additional screening for PCBs may be necessary.
10. Section 11.1.3.1: Please explain that the reason higher trophic level species are generally not affected by elevated levels of petroleum or other contaminants is due to the brief time duration of interaction with the impacted media (they move around a lot).
11. Section 11.1.5, page 140 Sediment ACLs: Please correct the sentence that says the sediment cleanup levels are based on ADEC Table C standards. They are based on criteria listed in 18 AAC 70.
12. Section 11.3.8: Please discuss if the reactive matting has been tested in frozen conditions and level of possible flooding it can handle.
13. Figure 4-1: Please include the ecological conceptual site model diagram.
14. Figure 11-1: The drainage basin area has red squares over the DRO cleanup level within the Scenario B cleanup zone. Please explain the criteria to determine the decision unit surrounding these red squares.

If you have any questions, please call me at (907) 269-3053.

Sincerely,



Jeff Brownlee
Environmental Specialist

CC: Lisa Giest, COE, Anchorage