

# **U.S. Army Corps of Engineers Alaska District**



## **FIRST PERIODIC REVIEW REPORT**

### **SITE 7 CARGO BEACH ROAD LANDFILL NORTHEAST CAPE FUDS ST. LAWRENCE ISLAND, ALASKA**

**Formerly Used Defense Site No. F10AK0969-05**

**FINAL  
FEBRUARY 2015**

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**FINAL  
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**APPROVED BY:**

  
\_\_\_\_\_  
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District Commander

**DATE:**

\_\_\_\_\_  
FEB 24 2015

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## ACRONYMS AND ABBREVIATIONS

|          |   |
|----------|---|
| °F       | degrees Fahrenheit  |
| AAC      | Alaska Administrative Code  |
| AC&WS    | Aircraft Control and Warning Station                                  |
| ACAT     | Alaska Community Action on Toxics                                     |
| ADEC     | Alaska Department of Environmental Conservation                       |
| ARAR     | applicable or relevant and appropriate requirements                   |
| bgs      | below ground surface  |
| Bristol  | Bristol Environmental Remediation Services, LLC                       |
| BTEX     | benzene, toluene, ethylbenzene, and xylenes                           |
| CERCLA   | Comprehensive Environmental Response, Compensation, and Liability Act |
| COC      | contaminant of concern  |
| CON/HTRW | containerized hazardous, toxic, or radioactive wastes                 |
| COPC     | contaminant of potential concern                                      |
| DD       | decision document   |
| DHHS     | U.S. Department of Health and Human Services                          |
| DRO      | diesel-range organics   |
| EPA      | U.S. Environmental Protection Agency                                  |
| FUDS     | Formerly Used Defense Site  |
| GRO      | gasoline-range organics   |
| HWAP     | hazardous waste accumulation point                                    |
| Jacobs   | Jacobs Engineering Group Inc.   |
| LUC      | land use controls   |
| mg/kg    | milligrams per kilogram   |
| mg/L     | milligrams per liter  |
| MOC      | Main Operations Complex   |
| PAH      | polycyclic aromatic hydrocarbon                                       |
| PCB      | polychlorinated biphenyl  |
| POL      | petroleum, oil, and lubricants  |
| RAB      | Restoration Advisory Board  |
| RAO      | removal action objective  |
| RCRA     | Resource Conservation and Recovery Act                                |
| RecKey   | record key  |
| RI       | remedial investigation  |
| ROD      | Record of Decision  |
| RRO      | residual-range organics   |
| TAH      | total aromatic hydrocarbon  |

## **ACRONYMS AND ABBREVIATIONS (Continued)**

|       |                                   |
|-------|-----------------------------------|
| TAqH  | total aqueous hydrocarbon         |
| TBC   | to be considered                  |
| USACE | U.S. Army Corps of Engineers      |
| WACS  | White Alice Communications System |

## EXECUTIVE SUMMARY

The U.S. Army Corps of Engineers contracted Jacobs Engineering Group Inc. to conduct the first Periodic Review of the selected remedy for Site 7 Cargo Beach Road Landfill (Site 7) at the Northeast Cape Formerly Used Defense Site on St. Lawrence Island, Alaska, in September 2013. This Report presents the results of the review.

The purpose of this review is to ensure the remedy selected in *Decision Document: Site 7 Cargo Beach Road Landfill, Containerized Hazardous, Toxic, and Radioactive Waste (CON/HTRW) Project #F10AK0969-05* (USACE 2009a), signed 19 June 2009, has been put into action, is performing effectively, and continues to be protective of human health and the environment. Data considered during this review included sample results and site inspections available as of April 2014. The Summary Form on the following pages presents the issues that were identified during the review, associated recommendations, follow-up actions, and the protectiveness statement.

Overall, this Periodic Review found the selected remedy for Site 7 will be protective when remedy implementation is complete.

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## PERIODIC REVIEW SUMMARY FORM

| SITE IDENTIFICATION  |  |   |
|--|--|---|
| <b>Site Name:</b> Site 7 Cargo Beach Road Landfill, Northeast Cape (St. Lawrence Island)<br><b>FUDS ID:</b> F10AK0969-05   |  |   |
| <b>EPA ID:</b> AK9799F2999   |  |   |
| <b>Region:</b> 10  | <b>State:</b> Alaska                                     | <b>City/County:</b> St. Lawrence Island |
| SITE STATUS  |  |   |
| <b>NPL Status:</b> Non-NPL Site  |  |   |
| <b>Multiple OUs?</b> No  | <b>Has the site achieved construction completion?</b> No |   |
| REVIEW STATUS  |  |   |
| <b>Lead agency:</b> Other Federal Agency<br><b>If “Other Federal Agency” was selected above, enter Agency name:</b> USACE  |  |   |
| <b>Author name (Federal or State Project Manager):</b><br>Jacobs Engineering Group Inc.<br>on behalf of USACE, Alaska District<br>Federal Project Manager Valerie Palmer |  |   |
| <b>Author affiliation:</b> Contractor  |  |   |
| <b>Review period:</b> September 2009 – April 2014  |  |   |
| <b>Date of site inspection:</b> 13 September 2013 – 15 September 2013  |  |   |
| <b>Type of review:</b> Periodic Review   |  |   |
| <b>Review number:</b> 1 (one)  |  |   |
| <b>Triggering action date:</b> 19 June 2009  |  |   |
| <b>Due date (<i>five years after triggering action date</i>):</b> 19 June 2014   |  |   |

## ISSUES/RECOMMENDATIONS

|                                      |  |                           |                         |                       |
|--------------------------------------|--|---------------------------|-------------------------|-----------------------|
| <b>Site: 7</b>                       | <b>Issue Category:</b> Remedy Completion   |                           |                         |                       |
|                                      | <b>Issue:</b> Land use controls to limit groundwater use and prevent construction of buildings on top of the landfill are not implemented. |                           |                         |                       |
|                                      | <b>Recommendation:</b> Implement LUCs following completion of the remedial action field work as described in the DD.                       |                           |                         |                       |
| <b>Affect Current Protectiveness</b> | <b>Affect Future Protectiveness</b>  | <b>Implementing Party</b> | <b>Regulatory Party</b> | <b>Milestone Date</b> |
| No                                   | Yes  | USACE                     | ADEC                    | 2018                  |
| <b>Site: 7</b>                       | <b>Issue Category:</b> Remedy Implementation   |                           |                         |                       |
|                                      | <b>Issue:</b> The 2013 site inspection identified debris protruding from the landfill cap.   |                           |                         |                       |
|                                      | <b>Recommendation:</b> Remove debris protruding from the landfill cap.   |                           |                         |                       |
| <b>Affect Current Protectiveness</b> | <b>Affect Future Protectiveness</b>  | <b>Implementing Party</b> | <b>Regulatory Party</b> | <b>Milestone Date</b> |
| No                                   | No   | USACE                     | ADEC                    | 2018                  |
| <b>Site: 7</b>                       | <b>Issue Category:</b> Remedy Implementation   |                           |                         |                       |
|                                      | <b>Issue:</b> The 2013 site inspection identified metal and wood debris in and around ponds adjacent to the landfill cap.                  |                           |                         |                       |
|                                      | <b>Recommendation:</b> Remove debris identified in and around ponds adjacent to the landfill cap.  |                           |                         |                       |
| <b>Affect Current Protectiveness</b> | <b>Affect Future Protectiveness</b>  | <b>Implementing Party</b> | <b>Regulatory Party</b> | <b>Milestone Date</b> |
| No                                   | No   | USACE                     | ADEC                    | 2018                  |

## PROTECTIVENESS STATEMENT

|   |  |   |
|---|--|---|
| <i>Site:</i> Site 7 Cargo Beach Road Landfill   | <i>Protectiveness Determination:</i><br>Will be Protective | <i>Addendum Due Date (if applicable):</i> |
| <i>Protectiveness Statement:</i> The remedy at Site 7 is expected to be protective of human health and the environment upon completion. In the interim, no exposure pathways that could result in unacceptable risks have been noted. |  |   |



## **1.0 INTRODUCTION**

The U.S. Army Corps of Engineers (USACE) contracted Jacobs Engineering Group Inc. (Jacobs) to conduct the first Periodic Review of the selected remedy at Site 7 Cargo Beach Road Landfill (Site 7) at Northeast Cape on St. Lawrence Island, Alaska (Figure A-1), in September 2013.

### **1.1 PURPOSE OF THIS REVIEW**

The purpose of this Periodic Review is twofold: to evaluate the implementation and performance of the remedial action that was selected for Site 7 and to determine if this action is protective of human health and the environment. The methods, findings, and conclusions of this Periodic Review identify issues found through an examination of the data collected over the past five years and provide recommendations to address them. This is the first Periodic Review for Site 7.

The Periodic Review process for Site 7 was triggered by the signing of *Decision Document: Site 7 Cargo Beach Road Landfill, CON/HTRW Project #F10AK0969-05* (USACE 2009a), 19 June 2009.

### **1.2 RESPONSIBILITIES**

USACE, Alaska District, is the lead agency for remedial actions at Site 7, located within the Northeast Cape Formerly Used Defense Site (FUDS). USACE contracted Jacobs to conduct and prepare this Periodic Review Report. The selected final remedial actions for Site 7 were chosen in accordance with the Defense Environmental Restoration Program, United States Code, Title 10, Section 2701, et seq.

Per FUDS Program Policy ER 200-3-1 (USACE 2004a), containerized hazardous, toxic, or radioactive wastes projects involving tanks, transformers, and other containers generally are not regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. However, this project has followed the CERCLA process as

a matter of administrative consistency to foster community trust and preserve good public relations with an ongoing project at the same location (USACE 2009a).

The primary concern at Site 7 is drums and other containers containing petroleum, oil, and lubricants (POL). However, with any unpermitted dump site, there is the potential for unknown hazardous wastes to be discovered. If an actual or threatened release of a CERCLA hazardous substance, pollutant, and/or contaminant is identified during the performance of this CON/HTRW cleanup, the situation will need to be assessed to determine if the project needs to transition to a CERCLA response action. An evaluation will be made, in accordance with CERCLA and the National Contingency Plan, to determine if a removal action is warranted to protect human health and the environment.

### **1.3 OVERVIEW**

The Periodic Review was conducted with all data available in the information repositories as of February 2014. The project team consisted of the USACE project manager, technical representatives, and contracted environmental engineering support. This effort included a review of the decision document (DD) requirements and work that has been done to satisfy those requirements, current and past monitoring data, and the current status of the remedy and the physical condition of the site. The general public was notified of the review with public notices placed in the *Nome Nugget* on 18 and 19 August 2013. In addition, a flyer containing the same information was mailed to community members and Alaska Department of Environmental Conservation (ADEC) in September 2013. Site 7 was visited and a site inspection was performed on 13 September 2013.

## 2.0 SITE CHRONOLOGY

Important events and relevant dates for Northeast Cape are shown in Table 2-1.

**Table 2-1  
Chronology of Site Events**

| Event  | Date           |
|--|----------------|
| Northeast Cape site acquired by the U.S. Air Force   | 1952           |
| Aircraft Control and Warning Station constructed   | 1951-1952      |
| WACS constructed   | 1954           |
| Aircraft Control and Warning Station operations terminated   | 1969           |
| WACS operations terminated   | 1972           |
| Bureau of Land Management obtained ownership of Northeast Cape                                     | August 1975    |
| Alaska Native Claims Settlement Act transferred land ownership to Sivuqaq, Inc. and Kukulget, Inc. | June 1979      |
| Environmental Assessment conducted   | 1985           |
| Site Assessment conducted  | 1991 and 1992  |
| Phase I RI conducted   | 1994           |
| All electrical transformers removed  | 1994           |
| Phase II RI/Feasibility Study and Human Health and Ecological Risk Assessment drafted              | 1996           |
| Remedial Action conducted to remove communications wire and cable on the tundra                    | 1997           |
| Phase II RI/Feasibility Study finalized  | September 1998 |
| Site Assessment conducted  | 1999           |
| Debris, hazardous waste, aboveground storage tank, and fuel pipeline removed                       | 2000           |
| Underground storage tanks, PCB- and POL-contaminated soil removed, buildings demolished            | 2001           |
| Phase III Remedial Investigation conducted   | 2001 – 2002    |
| 30 buildings and utilidor demolished; drums, communication poles, and wire removed                 | 2003           |
| Human Health and Environmental Risk Assessment finalized   | 2004           |
| Feasibility Study prepared   | 2007           |
| Groundwater Use Determination (18 AAC 350) submitted to ADEC                                       | April 2007     |
| ADEC comments on the Northeast Cape 350 Determination received (ADEC 2007b)                        | May 2007       |

**Table 2-1  
Chronology of Site Events (Continued)**

| Event   | Date           |
|---|----------------|
| DD selecting remedy for Sites 1 through 6 and 8 through 34 approved by HQ USACE | September 2009 |
| DD selecting remedy for Site 7 approved by USACE-POA                            | June 2009      |
| Remedial action begun to implement remedy for Site 7                            | June 2009      |
| Bristol requested landfill closure by ADEC for Site 7                           | November 2009  |
| Site 7 Landfill Cap Construction Report prepared                                | May 2010       |
| EPA evaluated USACE Cleanup of FUDS at Northeast Cape and Gambell               | February 2013  |
| Public notice of Five-Year Review published and public comment period opened    | August 2013    |
| Five-Year Review site visit   | September 2013 |
| Public comment period closed  | February 2014  |

**Note:**

For definitions, see the Acronyms and Abbreviations section.

### **3.0 BACKGROUND**

This is the first Periodic Review for Site 7. The section below is intended to describe the general conditions of the Northeast Cape Site in its entirety; the individual Site 7 history, physical characteristics, and land uses are discussed in detail in Section 3.2.1.

#### **3.1 NORTHEAST CAPE**

The project number for Site 7, located within the Northeast Cape FUDS is F10AK0969-05. The ADEC contaminated sites record key (RecKey) number for the entire Northeast Cape Site is 198532X917901. Site 7 is tracked with a separate RecKey (198532X917907) and File Number (475.38.013). The ADEC Hazard ID number for Site 7 is 213. The Environmental Protection Agency (EPA) site identification number for Northeast Cape is AK9799F2999. The Northeast Cape FUDS is not listed on the National Priorities List.

##### **3.1.1 Physical Characteristics**

The Northeast Cape FUDS is located on St. Lawrence Island, Alaska, in the western portion of the Bering Sea, approximately 135 air-miles southwest of Nome (Figure A-1). It is 9 miles west of the northeastern cape of St. Lawrence Island at 63°19' north, 168°58' west. The Northeast Cape property originally encompassed approximately 4,800 acres (7.5 square miles) and is bounded by Kitnagak Bay to the northeast, Kangighsak Point to the northwest, and the Kinipaghulghat Mountains to the south.

The Northeast Cape FUDS consists mainly of rolling tundra, which rises from the Bering Sea toward the base of the Kinipaghulghat Mountains. These mountains rise abruptly to an elevation of approximately 1,800 feet above sea level roughly 3 miles from the coastline. The Northeast Cape FUDS is not connected to other permanent communities on the island by road and is only accessible by air, water, or all-terrain vehicle trails. The Village of Savoonga, the closest community, is located approximately 60 miles to the northwest (Figure A-1). Savoonga has a subarctic maritime climate with some continental influences during the winter. Summer temperatures average between 40 to 51 degrees Fahrenheit (°F) and winter

temperatures average between -7 to 11 °F. Temperature extremes have been recorded at -34 and 67 °F. Average annual precipitation is 10 inches, with 58 inches of snowfall. The island is subject to prevailing winds, averaging 18 miles per hour.

### **3.1.2 Geology**

As presented in the DDs (USACE 2009a, b), St. Lawrence Island consists of isolated bedrock highlands of igneous, metamorphic, and older sedimentary rocks surrounded by unconsolidated surficial deposits overlying a relatively shallow erosional bedrock surface. The main area of operation, known as the Main Operations Complex (MOC), is located at an elevation of approximately 100 feet. In the area of the MOC, shallow, unconsolidated surficial materials overlie quartz monzonitic rocks of the Kinipaghulghat Pluton (Patton and Csejtey 1980). The pluton forms the mountainous area south of the Northeast Cape FUDS, which includes Kangukhsam Mountain. The Suqitughneq River drainage in the Kinipaghulghat Pluton has created an erosional valley and alluvial fan of unconsolidated sediments. The Northeast Cape FUDS is located on this alluvial fan, which protrudes north from the mountain front toward the Bering Sea. Granitic bedrock materials are exposed at the coast north of the site at Kitnagak Bay, which suggests the quartz monzonitic bedrock underlies the unconsolidated materials at a relatively shallow depth on a wave-cut erosional platform.

In general, the native soil stratigraphy at Northeast Cape is characterized by silts near the surface, overlying more sand-dominated soils at depth. The silt contains varying quantities of clay/sand/gravel, and varies from 0 to 10 feet in thickness. The silt is dark brown to dark green and sometimes exhibits a mottled texture. In some areas, the silt exhibits an aqua-green or blue color. Dark brown silts are observed in outcrops. The sand at depth contains varying degrees of silt/gravel/cobbles that range from 2 feet to greater than 20 feet in thickness. These deeper, coarse-grained materials generally are unsorted and likely to be of glaciofluvial origin. The depth to bedrock at the Northeast Cape FUDS is unknown (USACE 2009a, b).

### **3.1.3 Land and Resource Use**

St. Lawrence Island residents from the villages of Gambell and Savoonga engage in subsistence fishing, hunting, and gathering in the Northeast Cape FUDS area year-round. Currently, there are not any permanent residents of the Northeast Cape area; however, representatives of the Native Village of Savoonga have indicated a desire to re-establish a permanent residential community at the site in the future.

St. Lawrence Island supports habitats for the following endangered or threatened species: the polar bear (threatened); spectacled eider (endangered); Steller's eider (threatened); and the Western Distinct Population Segment of Steller sea lion (endangered). Walrus are protected under the Marine Mammal Protection Act. The area of Northeast Cape FUDS is used for the collection of berries and subsistence hunting of reindeer. The Suqitugheq River, which is located within the Northeast Cape FUDS, is used for subsistence fishing. The ocean surrounding the Northeast Cape FUDS is used extensively for subsistence activities, including fishing and hunting of whales, walrus, seals, and sea birds.

## **3.2 NORTHEAST CAPE SITE HISTORY**

The Northeast Cape FUDS was constructed as an Aircraft Control and Warning Station (AC&WS) during 1950 and 1951 to provide radar coverage and surveillance for the Alaskan Air Command, and later for the North American Air Defense Command, as part of the Alaska Early Warning System. The site was activated in 1952 and a White Alice Communications System (WACS) station was added to the site in 1954. The AC&WS and WACS operations supported 212 personnel and were terminated in 1969 and 1972, respectively. The majority of military personnel were removed from the site by the end of 1969.

The Northeast Cape site included areas for housing site personnel, power plant facilities, fuel storage tanks, distribution lines, maintenance shops, wastewater treatment facilities, and landfills. The buildings and majority of furnishings and equipment related to the AC&WS were abandoned in place initially due to the high cost of off-island transport.

In 1971, the villages of Gambell and Savoonga opted out of the Alaska Native Claims Settlement Act, which allowed for title to 1.136 million acres of land in the former St. Lawrence Island Reindeer Reserve established in 1903. The Gambell Native Corporation and Savoonga Native Corporation (now known as Sivuqaq, Inc. and Kukulget, Inc., respectively) received titles to all of St. Lawrence Island (except U.S. Surveys 4235, 4237, 4340, 4369, 3728) by Interim Conveyance No. 203 dated 21 June 1979. In 1982, the Navy obtained approximately 26 acres of land containing the former WACS. The land transfer later was deemed invalid and property ownership was reverted to Sivuqaq, Inc., and Kukulget, Inc.

### **3.2.1 History of Contamination**

Environmental investigations at Northeast Cape FUDS began in the mid-1980s, and subsequent phased remedial investigations (RI) were conducted between 1994 and 2004. The studies divided the concerns at Northeast Cape among 34 separate sites (USACE 2009a, b). One of these sites, Site 7, is an unpermitted landfill that was used as the installation's primary solid waste disposal area from 1965 until closure in 1974. Site 7 is located 0.8 miles south of Cargo Beach, midway between the MOC and the beach at Kitnagak Bay. The dump contains a variety of unknown materials. The landfill appears to have been created by dumping debris off the sides of a topographic mound. The debris then was covered by grading soil out from the top of the mound.

Environmental sampling activities at Site 7 have included the collection of soil, sediment, surface, and shallow groundwater samples. Detected analytes were compared to background concentration and the most conservative ADEC Method Two cleanup levels to determine the contaminants of concern (COC) (USACE 2009a). Chemical analyses were conducted for petroleum-related compounds, volatile organic compounds, semivolatile organic compounds, metals, pesticides, and polychlorinated biphenyls (PCB). Based on the results of the phased RIs, contaminants exceeding action levels in soil were identified in a limited amount of soil and included diesel-range organics (DRO), residual-range organics (RRO), PCBs, arsenic, chromium, and lead.



In soil, the maximum DRO concentration was detected approximately 75 feet east of Cargo Beach Road at a concentration of 32,000 milligrams per kilogram (mg/kg) (USACE 2009a). At all other sampling locations, DRO concentrations ranged from nondetect to 2,300 mg/kg, which is below the site-specific cleanup level of 9,200 mg/kg. PCBs were detected in soil along the southeastern edge of the landfill at concentrations ranging from nondetect to 50.8 mg/kg (USACE 2009a). In 2005, six locations with PCBs concentrations greater than 1 mg/kg were excavated and disposed offsite. Confirmation sampling results demonstrated that PCBs were successfully removed to concentrations below 1 mg/kg at four of the six locations. Two locations (7A and 7E), located on the southeastern slope of the landfill, still may contain PCB concentrations greater than 1 mg/kg between 2 and 3.5 feet below ground surface (bgs).

In sediment, chromium and PCBs were detected above cleanup levels at one location (SD301) with concentrations of 100 mg/kg and 1.78 mg/kg, respectively (USACE 2009a). DRO were detected at location SD301 at a maximum concentration of 4,900 mg/kg (USACE 2009a). In surface water, DRO were detected in one sample (SW101) northeast of the landfill in 1994 with an average triplicate concentration of 8.9 milligrams per liter (mg/L). No other exceedances were detected in surface water in 1994.

During the Phase I RI in 1994, four boreholes were placed around the landfill in an attempt to locate groundwater and characterize migration of contaminants around the landfill. Boreholes were drilled to a maximum depth of 31 feet and one borehole was terminated at 15 feet bgs and converted to monitoring well MW7-4 located east of the landfill and adjacent to a pond (USACE 2009a). Groundwater was not encountered at the other three boreholes. The lack of groundwater in these boreholes was attributed to frozen soil conditions. A thin layer of perched groundwater may be present immediately above the frozen soil during the warmer summer months (USACE 2009a). In 2001, several temporary well points were advanced in the areas surrounding the landfill. These well points generally confirmed the lack of groundwater. One location (WP7-1), located west of the landfill, contained anomalous levels of several metals, including arsenic, chromium, and lead, as well as low levels of DRO and RRO. The water samples were not filtered and turbid, suggesting the metals detected were

likely originating from the suspended sediments in the water column and are not representative of dissolved phase shallow groundwater conditions at the site. Groundwater also was collected from temporary well point WP7-3, which did not identify contaminants greater than cleanup levels (USACE 2009a). Groundwater migration from the site likely is limited because of the low permeability of the shallow, partially frozen soils. Groundwater probably remains in a relatively localized area with any migration occurring in a northeasterly direction, corresponding to surface topography.

Sampling of shallow groundwater is problematic at Site 7 due to the tundra/wetland environment, and sample collection is difficult because water is intermittent, slow to recharge, and highly turbid. Groundwater exposure at Site 7 is incomplete because there is not a sufficient quantity of water produced to be considered a reasonable potential future source for drinking water.

### **3.2.2 Initial Response**

Several non-time-critical interim removal actions were performed throughout Northeast Cape to address the removal of containerized hazardous/toxic waste items, buildings and miscellaneous debris, and hotspots of contaminated soils (USACE 2009a). Remedial actions specific to Site 7 are as follows:

- In 2000, more than 6,000 55-gallon drums were removed from the surrounding area.
- In 2003, 15 tons of scrap metal were removed from the area east of Cargo Beach Road.
- In 2005, approximately 14 tons of PCB-contaminated soil from six areas along the southeastern edge of the landfill, as well as exposed drums and miscellaneous debris from the landfill perimeter edges were removed (USACE 2009a).
- In 2007, a geophysical survey (USACE 2007a) was conducted to map the extent of buried metallic anomalies. The geophysical data were consistent with side-cast debris around the edges of a natural topographic mound. Most of the remaining debris identified was located at the northwest and southeast edges of the topographic mound. Buried debris was not identified to extend beneath Cargo Beach Road.

### **3.2.3 Basis for Taking Action**

The response actions selected in the DD are necessary to protect the public health and welfare or the environment from actual or threatened releases of hazardous substances into the environment, including unknown liquid contents of buried and partially exposed drums (USACE 2009a).

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## **4.0 SITE 7 REMEDIAL ACTIONS**

Removal action objectives (RAO) and the selected remedy are presented in this section. Details regarding the initial plans, remedy implementation, and current status of the remedy are provided.

### **4.1 REMEDY SELECTION**

The DD addressing Site 7 was approved on 19 June 2009 (USACE 2009a). The goal of the Defense Environmental Restoration FUDS Program is to reduce the risk resulting from past military activities to safe levels, in a timely, cost-effective manner.

#### **4.1.1 Removal Action Objectives**

Specific response action alternatives were developed and evaluated for Site 7. The RAOs for Site 7 are as follows:

- Reduce threats to human health, safety, and the environment.
- Remove drums containing POL, hazardous substances, pollutants, or contaminants, as necessary, to reduce the likelihood of future spillage, leakage, and exposure to humans, animals, and the food chain.
- Prevent current and future exposure to humans by ingestion, inhalation, and dermal contact with contaminated soils at levels above risk-based cleanup levels.
- Prevent exposure to ecological receptors by direct contact with contaminated soils/sediment above risk-based cleanup levels.

Cleanup levels for identified COCs in various media at Site 7 established in the DD are presented in Table 4-1. Soil cleanup levels were developed based on the Human Health and Ecological Risk Assessment (USACE 2004b) to be protective of future permanent residents with an assumed lifetime exposure to contaminated soils through incidental ingestion, inhalation, or dermal contact. Sediments that are intermittently submerged (i.e., ephemeral ponds, wet tundra) are considered soil, including all areas adjacent to Site 7. Surface water must meet water quality standards promulgated by the State of Alaska under Title 18 of the Alaska Administrative Code (AAC), Section 70 (18 AAC 70). The water quality criteria for

petroleum hydrocarbons, oil, and grease are described in 18 AAC 70.020(b) and stipulate these compounds may not cause a visible sheen upon the surface of the water. In addition, the regulations provide acceptable levels for total aromatic hydrocarbons (TAH) and total aqueous hydrocarbons (TAqH).

**Table 4-1  
Northeast Cape Cleanup Levels**

| Contaminant of Concern | Soil<br>(mg/kg)    | Surface Water<br>(mg/L) |
|------------------------|--------------------|-------------------------|
| Arsenic                | 11 <sup>a</sup>    | --                      |
| PCBs                   | 1 <sup>b</sup>     | --                      |
| DRO                    | 9,200 <sup>c</sup> | no sheen                |
| GRO                    | --                 | no sheen                |
| RRO                    | 9,200 <sup>c</sup> | no sheen                |
| TAH <sup>1</sup>       | --                 | 0.010                   |
| TAqH <sup>2</sup>      | --                 | 0.015                   |

**Notes:**

-- Cleanup level not specified in the DDs (USACE 2009b)

<sup>1</sup> TAH is the sum of BTEX.

<sup>2</sup> TAqH is the sum of BTEX and PAH.

<sup>a</sup> Site-specific background value

<sup>b</sup> 18 AAC 75, Table B1, over 40 inch Zone, direct contact pathway (as updated 9 October 2008)

<sup>c</sup> Risk-based cleanup level derived from site-specific risk assessment, ingestion/inhalation pathways, future residential use (USACE 2009b).

#### 4.1.2 Selected Remedy

Response action alternatives considered for Site 7 included: no further action; land use controls (LUC); natural attenuation; long-term monitoring; capping; and excavation and offsite disposal (USACE 2009a). Alternatives were evaluated for their ability to provide overall protection of human health and the environment; compliance with risk-based standards; short- and long-term effectiveness and performance; reduction in toxicity, mobility, and volume; implementability; and cost (USACE 2009a). The selected remedy for Site 7 contains several components and includes capping with intrusive removal action and incidental removal of contaminated soil. The selected remedial components for Site 7 and their current status are presented in Table 4-2.

**Table 4-2  
Site 7 Selected Remedies and Current Status**

| <b>Remedial Component</b>   | <b>Status</b>   |
|---|---|
| Expose underlying drums/debris by disturbing the upper approximately 1 foot of fill across the areas with mapped metallic anomalies (estimated 150,000 square feet) to determine if near-surface drums are present.   | Completed in 2009.<br><br>Ten test pits (10 feet by 10 feet by 4 feet) and 72 shallow potholes were advanced at Site 7 (USACE 2010a).   |
| Excavate test pits or trenches distributed across the areas of known metallic anomalies to determine if large caches of drums are present.  | Completed in 2009.<br><br>Excavation during drum removal overlapped the areas with magnetic anomalies (129,000 square feet). Final excavation depth was not reported (USACE 2010a).   |
| Remove or drain identified drums with liquid content; characterize the waste contents; transport offsite for proper disposal.   | Completed in 2009.<br><br>182 drums located in the test pits and potholes were drained, cleaned, and crushed before burial under the landfill cap. Drum contents were comingled and sent to an offsite disposal facility (USACE 2010a). |
| Remove incidental contaminated soils associated with identified drums to the extent grossly stained soils are determined by the contractor and USACE Quality Assurance Representative; characterize the soil for disposal; transport offsite for proper disposal. | Completed in 2009.<br><br>100 tons of soil was removed from 1 to 2 feet below the drums during excavation and sent to an offsite disposal facility (USACE 2010a).   |
| Cap the debris with a minimum 2 feet of fill.   | Completed in 2009.<br><br>Landfill cap material (28,994 cubic yards) was transported to the site from a local borrow source and spread across the site (USACE 2010a).   |
| Re-vegetate the site.   | Initiated in 2009 (USACE 2010a).  |
| Survey the landfill boundary with map and text description.   | Completed in 2009 (USACE 2010a).  |
| Deed notation   | Not yet completed.  |
| Implement LUCs to limit groundwater use and prevent construction of buildings on top of the landfill.   | LUCs to limit groundwater use and prevent construction of buildings on top of the landfill have not been implemented.   |
| Visual monitoring of the cap for settlement and erosion over a period of 5 years, with additional periodic reviews as necessary.  | Ongoing.<br><br>Conducted in 2011, 2012, and 2013 (Craner 2011; Shewman 2012; Geist 2013).  |

## **4.2 REMEDY IMPLEMENTATION**

This section presents a brief description of the selected remedy, its implementation history, current status, and operations and maintenance plan.

### **4.2.1 Remedy Implementation and Status**

The DD-selected remedy for Site 7 was to excavate test pits across the areas of known metallic anomalies to expose underlying drums and debris, remove or drain near-surface drums, install a landfill cap, conduct periodic visual monitoring for settlement and erosion over a period of five years, survey the landfill boundary, and implement LUCs to limit groundwater use and prevent construction of buildings on top of the landfill.

Remedy implementation was initiated in 2009. Metallic anomalies identified by geophysical investigation in 2007 were located by survey and investigated. The top 1 foot of soil was uncovered to locate drums within the shallow subsurface. Excavations included 73 shallow “potholes” across the surface of the landfill, 10 test pits (at least an area of 100 square feet and a depth of 4 feet), and previously delineated magnetic anomaly areas covering approximately 129,000 square feet (USACE 2010a). Excavation efforts encountered and disposed of approximately 201 pounds of PCB light ballasts, 350 pounds of lead batteries, 4,100 pounds of lead debris, and approximately 10 gallons of antifreeze. Contents recovered from drums at Site 7 (approximately 2,150 gallons) were containerized and shipped offsite for disposal. Approximately 100 tons of petroleum-stained soil encountered during excavation efforts was excavated and containerized for offsite disposal.

At the conclusion of the 2009 field season, approximately 136 tons of nonhazardous waste, 2.7 tons of hazardous waste, and 182 filled drums were removed from the landfill (USACE 2010a). Fifty of the filled drums were transported offsite after being emptied and cleaned and more than 1,000 empty drums were cleaned, crushed, and returned to the landfill.

Waste encountered at Site 7 was consolidated and cleaned at a Hazardous Waste Accumulation Point (HWAP) on the gravel pad at Site 6. Drums containing liquid product



were transported to the HWAP, cut open, and pumped of their contents. Drums then were washed with a high-pressure hot water rinse within an open-top container express unit. Waste streams processed at the HWAP included DRO-contaminated soil, oil waste, PCB light ballasts, batteries, lead debris, antifreeze, and wash-water (USACE 2010a).

A 2-foot minimum landfill cap was constructed using material from an on-island borrow source south of Site 31. The cap was graded to promote surface runoff and prevent erosion. The landfill cap boundaries are shown on Figure A-6. Locations where debris was not encountered are noted as potentially having less than a 2-foot cap in order to maintain grade (USACE 2010a). On 20 November 2009, site closure was requested (Bristol Environmental Remediation Services [Bristol] 2009). On 7 December 2009, site closure was considered premature and denied by ADEC (USACE 2010a). In 2011, Site 7 was re-seeded and fertilized to assist vegetation growing on the surface of the landfill cap. A stabilization analysis was conducted by Bristol and determined the landfill cap met non-vegetative permanent stabilization requirements established in the 2011 Alaska Construction General Permit (USACE 2012).

In 2013, surface water was collected from three locations adjacent to the landfill cap and submitted to an offsite analytical laboratory for analysis of gasoline-range organics (GRO), DRO, RRO, benzene, toluene, ethylbenzene, and xylenes (BTEX), polycyclic aromatic hydrocarbons (PAH), PCBs, and both dissolved phase and total Resource Conservation and Recovery Act (RCRA) metals with nickel and zinc. The collection of shallow groundwater samples was attempted using a screened drive point and hand tools. Refusal was met between 1 and 3 feet bgs at four different locations northeast of the landfill cap. Surface water and attempted groundwater locations are shown on Figure A-6. Surface water sample results were compared to the applicable surface water criteria (18 AAC 70) listed in the DD for TAH, TAqH, and no sheen (USACE 2009a). No exceedances of the criteria were found (USACE 2014b). Furthermore, the surface water results for metals, PCBs, VOCs, and PAHs did not exceed any screening criteria for drinking water.

At the time of this review, LUCs to limit groundwater use and prevent construction of buildings on top of the landfill had not been implemented.

#### **4.2.2 Operations and Maintenance**

Visual monitoring of the landfill cap by the USACE quality assurance representative occurred in September 2011, July 2012, and August 2013; observations are noted in the 2011, 2012, and 2013 Site Inspection Checklists (Craner 2011; Shewman 2012; Geist 2013). During site inspections, ponded water was observed against the north, west, and south sides of the landfill cap. Vegetative cover was estimated at 70 percent on the cap surface and 60 percent on the side slopes. The cap was noted as appearing structurally sound and stable with no visible erosion, leakage, or debris. Grass seed was spread by Bristol on 13 September 2011 to encourage vegetative re-growth in areas noted as bare (Craner 2011). A visual inspection of the landfill cap also was conducted as part of this review in September 2013 and is described in Section 6.9.

## **5.0      PROGRESS SINCE THE LAST REVIEW**

This is the first Periodic Review for Site 7.

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## **6.0 PERIODIC REVIEW PROCESS**

As previously stated, this site is not regulated under CERCLA; however, to maintain administrative consistency, this Periodic Review was conducted using the following guidelines:

- EPA *Comprehensive Five-Year Review Guidance* (EPA 2001)
- *Clarifying the Use of Protectiveness Determinations for CERCLA Five-Year Reviews*. (EPA 2012b)
- EPA Five-Year Review Summary Form Template (EPA 2001)

### **6.1 ADMINISTRATIVE COMPONENTS OF THE PERIODIC REVIEW PROCESS**

USACE notified potentially interested parties of the occurrence of the review using newspaper notices, emails, and distribution of a fact sheet (described in Section 6.2) in the fall of 2013. The Periodic Review team consisted of individuals from USACE with technical support provided by Jacobs. The Periodic Review included the following components: document reviews; site inspection; interviews with the state regulatory agency and community members; an assessment of protectiveness of the remedies; community notification and involvement; and development of this Periodic Review Report. Documentation of the site inspection is located in Appendices C and D. Interview documentation is included in Appendix E.

### **6.2 COMMUNITY NOTIFICATION AND INVOLVEMENT**

Public participation has been an important component of the remediation process at the Northeast Cape FUDS. A Restoration Advisory Board (RAB), comprised of community members and other interested parties, was established January 2000. Biannual RAB meetings are held to keep the public informed of ongoing project activities at the Northeast Cape FUDS. In the past, RAB meetings have been held more frequently, as needed. Detailed minutes are recorded and distributed following each meeting. Under the Technical Assistance for Public Participation program, the RAB is served by a technical advisor to provide

technical guidance and comments on work plans, reports, proposed remedies, and potential environmental and human health impacts.

The community was notified of, and given opportunity to provide input to, the Periodic Review. The general public was notified of the Periodic Review with public notices placed in the *Nome Nugget*, 18 and 19 August 2013. In addition, a flyer containing the same information was mailed to select community members and ADEC in September 2013. The public notices and flyer included information regarding the simultaneous Five-Year Reviews and Periodic Reviews occurring at 17 other Northeast Cape sites.

Community interviews for this Periodic Review were conducted (in conjunction with community interviews for the simultaneous Periodic Reviews and Five-Year Reviews) by Jacobs personnel at the first 2014 RAB meeting, 15 and 16 January. Additional phone interviews were conducted by Jacobs personnel, 4 and 6 February 2014. The interview concerns related specifically to Site 7 or describing sitewide concerns are summarized in Section 6.10. The complete interview record, public notices, and flyer are provided in Appendices E and F.

Following USACE signature of the final review and distribution of the final report, a second fact sheet describing the findings of the review will be distributed in combination with the results of the Periodic Review. A copy of this Periodic Review Report will be added to three information repositories (Sivuqaq Corporation Building (Lodge) in Gambell, Alaska; Savoonga City Hall, Savoonga, Alaska; Alaska Resource Library and Information Services, Anchorage, Alaska).

### **6.3 DOCUMENT REVIEW**

The DD for Site 7 was reviewed for the site history and to identify RAOs, contaminants of potential concern (COPC), COCs, and cleanup levels. The potential for changes to standards identified as applicable requirements in the DD and/or newly promulgated standards that may affect the protectiveness of the remedies are evaluated in Appendix B and discussed in

Section 7.0. The following documents were reviewed for updates to applicable requirements and new toxicity information:

- ADEC 18 AAC 75, *Oil and Other Hazardous Substances Pollution Control* (ADEC 2012)
- ADEC *Cleanup Levels Guidance* (ADEC 2008)
- EPA Integrated Risk Information System retrieved from <http://www.epa.gov/iris/> (EPA 2013)

In addition to the documents mentioned above, the following documents also were reviewed to assess the protectiveness of the remedy:

- RI/feasibility study reports (when necessary to clarify information in the DD)
- The *Human Health and Ecological Risk Assessment* (USACE 2004b)
- Removal action report
- Monitoring reports

Key documents referenced during this Periodic Review are listed in Section 12.0 of this Report.

## **6.4 DATA REVIEW**

The remedy at Site 7 is to expose underlying drums/debris by disturbing the upper approximately 1 foot of fill across the areas with mapped metallic anomalies to determine if near-surface drums are present, remove identified drums and incidental contaminated soils, cap the landfill, conduct periodic visual monitoring of the cap for settlement and erosion for five years, and implement LUCs. The remedy was initiated in 2009. During drum removal efforts, several waste streams were encountered. Waste characterization samples were collected from excavated soil and drums containing drilling cuttings and recovered product. Waste characterization sample results were reviewed to identify any previously unidentified contaminants and/or changes in maximum detected concentrations of known COCs.

## **6.5 RECOVERED PRODUCT WASTE CHARACTERIZATION**

A total of 24 liquid-containing accumulation drums resulted from the removal activities at Site 7. Each drum was field screened using CLOR-D-TECT test kits and results greater than 1,000 parts per million required fixed laboratory analysis. Three drums failed the field screening test and one primary and one duplicate sample were composited for analysis. Sample results identified lead at 200 mg/kg. The three drums were classified as hazardous waste due to lead results and the presence of chlorinated paraffins in excess of 1,000 mg/kg. A fourth drum was verified to contain nearly 100 percent ethylene glycol antifreeze.

In addition to liquid wastes, oil sludge and kitty litter contaminated with oil were managed at the HWAP. Three primary samples and one duplicate sample were collected from a combination of two oil sludge drums and 17 drums of kitty litter contaminated with oil. These samples indicated the presence of Aroclor 1248 up to 2.4 mg/kg and Aroclor 1254 at 1.1 mg/kg.

## **6.6 EXCAVATED SOIL**

COPCs in soil at Site 7 identified in the DD include DRO, arsenic, chromium, lead, and PCBs. At the time of the DD (USACE 2009a) these contaminants were believed to be limited and were planned to be capped or removed as grossly contaminated soils. Grossly contaminated soils encountered during drum removal efforts were excavated in 2009. Confirmation samples were not collected following removal of grossly stained soils (USACE 2010a). Table 6-1 presents maximum known concentrations at the time of the DD and the maximum concentrations detected in excavated soil waste accumulated at the HWAP.



**Table 6-1**  
**Site 7 Maximum Detected Concentrations in Excavated Soil**

| <b>Analyte</b> | <b>Cleanup Level<sup>a</sup></b> | <b>Unit</b> | <b>DD Maximum Concentration</b> | <b>Maximum Concentration in Excavated Soil</b> |
|----------------|----------------------------------|-------------|---------------------------------|--|
| DRO            | 9,200                            | mg/kg       | <b>32,000</b>                   | <b>11,000</b>                                  |
| Arsenic        | 11                               | mg/kg       | <b>17.3</b>                     | 0.0052 J                                       |
| Chromium       | 50                               | mg/kg       | <b>75</b>                       | 0.0053 J                                       |
| Lead           | 400                              | mg/kg       | <b>460</b>                      | 1.4  |
| PCBs           | 1                                | mg/kg       | <b>&gt; 0.5</b>                 | 1 J  |

**Notes:**

<sup>a</sup> Cleanup level reported in the DD (USACE 2009a)

**BOLD** = result exceeds cleanup level

J = The analyte was positively identified; the quantitation is an estimation

## 6.7 SURFACE WATER

The COC in surface water is DRO. In 1994, DRO was detected in a collocated surface water and sediment sample at concentrations of 8.9 mg/L (average of triplicate samples) and 4,900 mg/kg, respectively (USACE 2007c). Groundwater grab samples collected in 2001, approximately 200 feet downgradient of the surface water exceedance, did not contain DRO greater than cleanup levels.

In 2013, additional surface water sampling was conducted to evaluate existing surface water conditions at Site 7 (USACE 2014b). The 1994 surface water sampling location was not available for resampling in 2013 because the area previously had been covered by the landfill cap in 2009. As an alternative, site surface water was collected from three ponds located near the base of the landfill cap. The locations were selected as a representative subset of site surface water. Surface water sampling locations are shown in Figure A-2. Surface water samples were analyzed for DRO, RRO, GRO, BTEX, PAHs, PCBs, RCRA metals, nickel, and zinc. Analytical results did not exceed the surface water criteria for TAH/TAqH and no sheen specified in the DD. Furthermore, the surface water results for metals, PCBs, VOCs, and PAHs did not exceed any screening criteria for drinking water (USACE 2014b).

## **6.8 GROUNDWATER**

RRO, chromium, lead, and nickel previously have been detected in shallow groundwater above ADEC drinking water standards at Site 7 (USACE 2009a). The DD did not include a remedy for groundwater contamination at Site 7 because shallow groundwater at Site 7 was not a current or reasonably expected potential future source for drinking water. At the time of this Periodic Review, LUCs to limit groundwater use and prevent construction of buildings on top of the landfill had not been implemented. In 2013, groundwater sampling was attempted northeast of the landfill cap (USACE 2014b). Drive point refusal was encountered at depths ranging from 6 to 30 inches bgs, due to large rocks. Groundwater was not encountered during the attempts, and it is not clear whether groundwater is present onsite.

Historically, sampling groundwater at this site has been difficult. Previous efforts to install temporary well points were successful at location WP 7-1 in 2001, yet required approximately three days before sampling could take place due to a low groundwater production rate. In some cases, the sampling points purged dry after 48 hours, without producing the required sampling volume (USACE 2007c). Two groundwater grab samples (WP7-2 and WP7-3) collected in 2001 were obtained by digging “pits” 36 to 40 inches bgs and allowing them to fill with water prior to sampling.

Significant effort will be required to install and maintain permanent monitoring wells at Site 7. The use of a tracked drill rig, in addition to air rotary or sonic drilling methods, likely would be needed for the successful installation of a monitoring well at this location. Walking the needed drill rig to boring locations would subject the fragile tundra and surface vegetation to disturbance. Additionally, any monitoring wells likely would be subject to frost jacking due to the extreme variability of seasonal conditions.

## **6.9 RECOMMENDATIONS FOR SITE 7**

The site inspection for this Periodic Review was conducted on 13 September 2013. The site inspection team consisted of USACE consultants from Jacobs. The team did not identify any

active monitoring wells, signs of site disturbance (such as excavations), or changes in land use from those described in the DD. The site inspection checklist is located in Appendix C.

The site inspection team made the following recommendations:

- Implement LUCs to limit groundwater use and prevent construction of buildings on top of the landfill as described in the DD (USACE 2009a) within five years of this review. The timeframe for implementing this milestone will coincide with the remedy implementation of LUCs at other Northeast Cape sites.
- Conduct an additional Periodic Review to evaluate remedy implementation no later than five years from the date of this review. The second Periodic Review could occur sooner if removal of the debris protruding through the surface of the southeastern edge of the landfill and the implementation of LUCs occurs. The second Periodic Review will make recommendations regarding future periodic reviews as Site 7.

The landfill cap at Site 7 was observed in good condition with no apparent signs of erosion or cracking. The soil used for vegetative cover was observed to be very coarse, making vegetative growth difficult and sparse. There was a small amount of debris protruding from the cap on the southern side of the cap near the armored rock (Photo No. 15, Appendix D). Several metal items were observed in ponds located immediately north of the landfill cap (Photo Nos. 6, 7, 9, 10, 11, 18, and 19, Appendix D). A few rusted open drums were observed in ponds located to the north and southeast of the landfill cap (Photo Nos. 6 and 19, Appendix D). Bentonite was observed on the ground surface and thought to be an abandoned monitoring well southeast of the landfill cap (Photo No. 17, Appendix D).

## **6.10 INTERVIEWS**

During the course of this Periodic Review, interviews were conducted with representatives from several agencies and community members associated with the Northeast Cape FUDS to incorporate all sites within Northeast Cape requiring a Five-Year Review or Periodic Review. Concerns related specifically to Site 7 are summarized below. The complete Interview Record Forms are provided in Appendix E.

**Five members of the Kukulget Inc. Board of Directors provided responses to interview questions in a group format. Their general impressions of the cleanup efforts at the Northeast Cape FUDS were good, but they had several remaining questions, concerns, and suggestions. Issues discussed during this group interview are summarized by topic below.**

- Landfills were capped and reseeded with what was referred to as “local grass.” The community members expressed concern with the lack of vegetative re-growth on the landfill cap and stated, “Grass can’t grow on rocks.”
- One member, who previously had worked with Bristol during the remedial actions at Site 7 in 2009, said engines, an airplane, transformers, batteries, a road grader, and barrels were all seen beneath the area that was excavated. He indicated excavation efforts were limited to the surface, and these items remain onsite beneath the cap. He stated he did not understand the rationale behind removing large amounts of contaminated soil throughout Northeast Cape while significant quantities of potentially hazardous debris in the landfills remained and recommended opening up the cap to remove all remaining debris, as well as changing the cap material to soil, where vegetation can grow.
- Several members suggested adding signage to the perimeter of the landfills to notify site visitors of the presence of the landfill. They also suggested adding monitoring wells to landfills and the MOC for continued groundwater monitoring and requested the monitoring wells be well marked to avoid being hit during the winter months when visibility of the stickup mounts may be obscured by snow.

**Alaska Community Action on Toxics (ACAT) and Native Village of Savoonga Tribal Member Executive Director (Pamela Miller) and Environmental Health and Justice Program Director (Vi Waghiyi) provided responses to interview questions via email. Ms. Miller and Ms. Waghiyi indicated the tribe should be an official signatory to the DDs. Their general impression was that cleanup efforts at Northeast Cape were far from complete and, additionally, not protective of the health of the people living on the island. They had several additional questions, concerns, and suggestions, which are summarized by topic below.**

- Ms. Miller and Ms. Waghiyi stated they believed contamination to persist beneath the landfill caps installed at Sites 7 and 9. They indicated this is of great concern for human health and expressed worry regarding leachate from the landfills affecting the Suqitugheq River watershed, fish and wildlife, and human health.
- Long-term monitoring of groundwater is requested to occur at sites where monitoring wells have been removed, as well as installation of new monitoring wells at key locations, such as downgradient of the MOC and landfill sites.

**Various other community members also voiced concerns. Issues discussed during these individual interviews related specifically to Site 7 are summarized below.**

- Mitchell Kiyuklook, President of the Native Village of Savoonga: Mr. Kiyuklook indicated the Northeast Cape FUDS has had significant impacts on the surrounding community, including increased incidences of cancer, high blood levels of PCBs, and decreases in the number of seals on the island and fish in the Suqitughneq River. Mr. Kiyuklook had concerns regarding remedies identified in the DDs, including the site-specific cleanup levels established for petroleum hydrocarbons and capping the Site 7 landfill while it still contains a large number of remaining buried drums. Mr. Kiyuklook indicated materials were collected from the Northeast Cape FUDS for construction around the island. Thus, contaminants may be present throughout St. Lawrence Island. Mr. Kiyuklook did not feel as though he was well informed about the activities and progress at Northeast Cape. He indicated that, although the information may have been presented at meetings, the community required a better explanation of what the regulations mean and how the cleanup levels were established. He suggested information be provided to the community before the reports are finalized, which can sometimes be up to a year after work has been completed. Mr. Kiyuklook requested reindeer on the island be re-sampled for levels of PCBs now that PCB cleanup efforts have been completed. Lastly, Mr. Kiyuklook mentioned a recent conference call with Native American Lands Environmental Mitigation Program, ACAT, and Ron Scurdato, during which was discussed trace levels of radiation that were identified on metals shipped from Northeast Cape for recycling. He indicated he would like this new information investigated further.

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## 7.0 TECHNICAL ASSESSMENT

The protectiveness of the selected remedy is analyzed in this technical assessment, which was completed by answering three questions, as described below.

### 7.1 QUESTION A

*Question A: Is the remedy functioning as intended by the DD?*

*Answer: Yes.*

This question was answered by considering the remedy's implementation status outlined in Section 4.0 and available information reviewed in Section 6.0 and comparing the remedy to the requirements in the DD. Remedial action performance, monitoring, LUCs, and indicators of potential problems were assessed as applicable.

#### **Remedial Action Performance**

The selected remedy for Site 7 has several components, including drum removal and installation of a 24-inch minimum soil cap. The site inspection, conducted on 13 September 2013, verified the construction of a landfill cap and noted the integrity of the cap was in good condition without evidence of erosion or cracking. A small amount of debris was identified protruding through the surface of the southeastern edge of the landfill. The site inspection also identified metal debris in several surface water bodies adjacent to the landfill cap that may pose safety risks to future site visitors.

#### **System Operations and Maintenance**

An additional visual inspection event is recommended for the Site 7 landfill cap. The inspection is recommended to occur following the removal of the identified debris protruding through the surface of the southeastern edge of the landfill and implementation of LUCs. The second event is recommended to occur within five years of this review. Additional monitoring events should be documented within the second Periodic Review, at which time, the need for future reviews will be evaluated.

## **Implementation of Institutional Controls and Other Measures**

The selected remedy for Site 7 included the implementation of LUCs to limit groundwater use and prevent construction of buildings of top of the landfill. At the time of this review, LUCs had not been implemented.

## **Opportunities for Optimization**

Identified debris on the surface of the southeastern edge of the landfill cap should be removed. Metal debris identified in adjacent water bodies should be removed.

## **Early Indicators of Potential Issues**

None.

## **7.2 QUESTION B**

*Question B: Are the exposure assumptions, toxicity data, cleanup levels, and RAOs used at the time of the remedy selection still valid?*

*Answer: Yes.*

Question B was answered by evaluating the effects of cleanup level or action limit changes in applicable requirements and exposure assumptions that were used at the time of remedy selection that may affect its protectiveness. In addition, COCs listed in the applicable DD were evaluated to determine whether new standards or new data obtained after the DDs were signed to become COPCs (Appendix B).

This evaluation was completed according to EPA's guidance for applicable or relevant and appropriate requirements (ARAR) (EPA 2001):

*“Generally you should only consider changes in standards that were identified as ARARs in the Record of Decision (ROD), then identify any newly promulgated standards for COPCs, and TBCs [To Be Considered] identified in the ROD that bear on the protectiveness of the remedy. As such, you should review any newly promulgated standards, including revised chemical-specific requirements (such as MCLs [maximum contaminant levels], ambient water quality criteria), revised action and location-specific requirements, and state standards if there were considered ARARs in the ROD. In evaluating a change*



*in a standard that was identified as an ARAR in the ROD, or a newly promulgated standard or TBC, you should establish whether the new requirement indicates that the remedy is no longer protective.”*

The evaluation of new or changed standards was accomplished by first identifying the applicable standard and then comparing it to the current standard. Potential cleanup levels for COPCs not identified in the DD were compared to current applicable state cleanup standards. Table B-1 in Appendix B summarizes the evaluation of COCs and COPCs.

#### **Changes in Standards and To Be Considered**

The DD listed 18 AAC 75.341 as the applicable requirement for soil and 18 AAC 75.345 and 18 AAC 70.020(b) for groundwater. For those compounds listed as COCs, the cleanup level either has not changed or the site-specific values were calculated using a Method Four risk assessment.

#### **Changes in Exposure Pathways**

None identified.

#### **Changes in Toxicity and Other Contaminant Characteristics**

None identified.

#### **Changes in Risk Assessment Methods**

None identified.

#### **Expected Progress Toward Meeting Removal Action Objectives**

RAOs are expected to be met following removal of debris identified during the 2013 Site Inspection and the implementation of LUCs to limit groundwater use and prevent construction of buildings on top of the landfill.

### 7.3 QUESTION C

*Question C: Has any other information come to light that could call into question the protectiveness of the remedy?*

*Answer: No.*

This question was answered by considering whether ecological risks have been addressed adequately at the site, if the site is subject to natural disasters, and any plans for potential land use or land use changes.

### 7.4 TECHNICAL ASSESSMENT SUMMARY

Attainment of RAOs is measured through collection of empirical data, and data were compared against applicable requirements. The remedy selected for Site 7 is functioning as intended by the DD, but implementation is not yet complete. It is expected to be protective upon completion.

## 8.0 ISSUES

This section summarizes issues and concerns related to current site operations, conditions, or activities that were identified during this Periodic Review. Issues were evaluated to determine whether they affected the current or future protectiveness of the associated remedy. Table 8-1 summarizes issues identified that affect the protectiveness of the remedy (Issue 1) and issues identified as not affecting the protectiveness of the remedy (Issues 2 and 3). Unresolved concerns raised by the community also are summarized and discussed.

**Table 8-1**  
**Issues Identified**

| <b>Issue No:</b> | <b>Issue</b>   | <b>Reference</b>                  | <b>Affects Current Protectiveness? (Yes/No)</b> | <b>Affects Future Protectiveness? (Yes/No)</b> |
|------------------|--|-----------------------------------|---|--|
| 1                | LUCs to limit drinking water use and prevent construction of buildings on top of the landfill have not been implemented. | USACE 2009a<br>USACE 2009b        | No  | Yes  |
| 2                | The 2013 site inspection identified debris protruding from the landfill cap.   | 2013 Site Inspection (Appendix C) | No  | No   |
| 3                | The 2013 site inspection identified metal and wood debris in and around ponds adjacent to the landfill cap.              | 2013 Site Inspection (Appendix C) | No  | No   |

## 8.1 COMMUNITY ISSUES

Issues raised by the community regarding cleanup activities at Northeast Cape FUDS were identified through community interviews, RAB meeting minutes, public meeting minutes, and letters to the EPA. Issues related specifically to Site 7 or describing sitewide concerns have been summarized below with their current status.

**The communities of St. Lawrence Island would like the tribes instituted as official signatories/Parties to any RODs (ACAT 2009; Community Interview 2013, Appendix E)**

The Corps cannot seek Tribal signatures on RODs because the tribe does not have jurisdiction over the land itself. CERCLA regulations require that Indian tribes have jurisdiction over the site in order to be afforded substantially the same treatment as states (USACE 2010b).

**Lichen is prominent throughout the site and has not been sampled for contaminants. Reindeer populations frequent this area and are used for subsistence (RAB 2012a).**

Lichen has not been evaluated for contaminants at Northeast Cape. The U.S. Department of Health and Human Services (DHHS) performed a health consultation in 2001 and determined reindeer exposures to site-related contaminants are low. Detectable health effects are not expected in individuals consuming reindeer muscle and fat on St. Lawrence Island (DHHS 2001). The risk assessment conducted for Northeast Cape evaluated reindeer as an ecological endpoint and determined the cross fox represented a more highly exposed terrestrial mammal because it has a smaller home range than reindeer and, as a carnivore, is at a higher trophic level. The results of the evaluation indicated the ecological hazard estimate for the cross fox was below the departure criterion of 1.0 for all sites (USACE 2004b).

**A community member indicated there was a pipeline break between the Native Village of Northeast Cape and the Site 7 Landfill. He would like this area located and tested (RAB 2012a)**

The area (identified as an additional pipeline break site during the 2012 December RAB meeting) was included as an area of investigation during the 2013 field season. Analytes were not identified at concentrations greater than site-specific cleanup levels (USACE 2014a).

**ACAT would like cleanup levels to be reevaluated given the multiple health burdens that affect the community (EPA 2012c).**

Cleanup levels used for the Northeast Cape were developed based on the Human Health and Ecological Risk Assessment, Washington Administrative Code, and AAC. They are considered protective of future residential use (USACE 2009a, 2009b, 2004b).

**Sampling was not conducted within the landfill at Site 7 following remedial activities in 2009. It is not clear whether contaminants remain above cleanup levels below the landfill cap at Site 7 (USACE 2010a; EPA 2012a).**

Visual monitoring of Site 7 is recommended to ensure the remedy remains protective of human health and the environment. As previously established, shallow groundwater near the landfill cap is slow to recharge and does not produce water in sufficient quantities to provide drinking water. As a result, groundwater monitoring is considered unnecessary; however, monitoring of nearby surface water is recommended (EPA 2012a).

**Responses to questionnaires identified a few areas where additional contamination related to FUDS activities may be present. Community members identified potentially hazardous debris beneath the landfill cap at Site 7 (Section 6.9 and Appendix E).**

As part of the selected remedy, an intrusive investigation was conducted in 2009 to identify and remove any large caches of drums with potentially hazardous contents from the Site 7 landfill. This investigation is detailed in Section 3.2.1.

(intentionally blank)

## 9.0 RECOMMENDATIONS AND FOLLOW-UP ACTIONS

Recommendations and follow-up actions have been identified to address the issues presented in Section 8.0. Table 9-1 presents these recommendations and identifies Issue 1 as affecting protectiveness and Issues 2 and 3 as not affecting protectiveness.

**Table 9-1**  
**Recommendations and Follow-up Actions**

| Issue No. | Recommendations/<br>Follow-up Actions   | Party Responsible | Regulatory Party | Milestone Date | Affects Protectiveness? (Yes/No) |        |
|-----------|---|-------------------|------------------|----------------|----------------------------------|--------|
|           |   |                   |                  |                | Current                          | Future |
| 1         | Implement LUCs following completion of the remedial action fieldwork, as described in the DD. | USACE             | ADEC             | 2018           | No                               | Yes    |
| 2         | Remove debris protruding from the landfill cap.   | USACE             | ADEC             | 2018           | No                               | No     |
| 3         | Remove debris identified in and around ponds adjacent to the landfill cap.                    | USACE             | ADEC             | 2018           | No                               | No     |
| 1,2,3     | Conduct an additional Periodic Review of Site 7   | USACE             | ADEC             | 2019           | No                               | No     |

(intentionally blank)



## **10.0 PROTECTIVENESS STATEMENT(S)**

The remedy at Site 7 is expected to be protective of human health and the environment upon its completion. In the interim, no exposure pathways that could result in unacceptable risks have been noted.

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## **11.0 NEXT REVIEW**

Future periodic reviews for Site 7 are necessary to evaluate remedy completion. The next Periodic Review is due on or before 19 June 2019.

(intentionally blank)

## 12.0 REFERENCES

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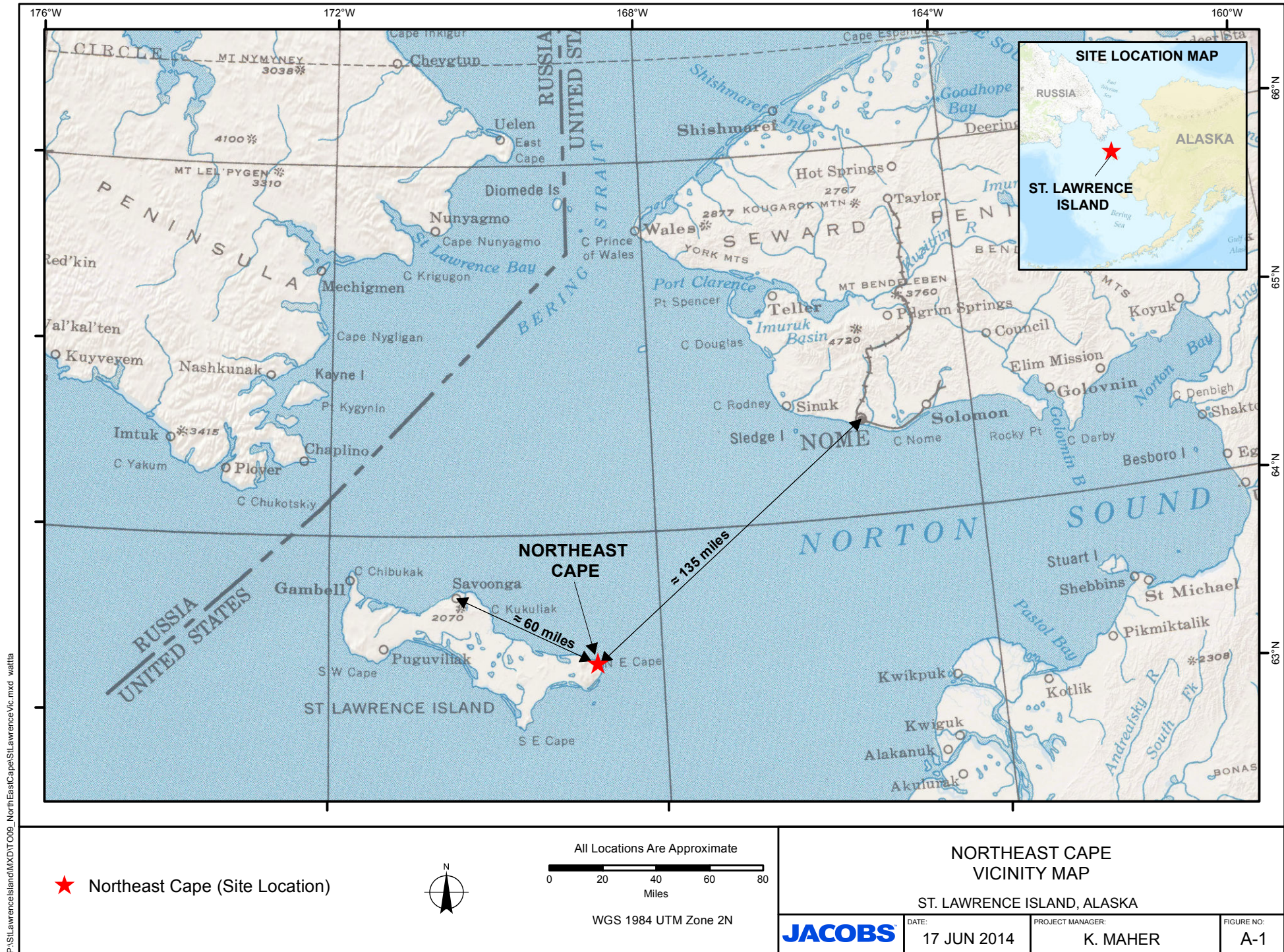
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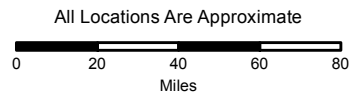
## **APPENDIX A**

### **Figures**





★ Northeast Cape (Site Location)



WGS 1984 UTM Zone 2N

## NORTHEAST CAPE VICINITY MAP

ST. LAWRENCE ISLAND, ALASKA

**JACOBS**

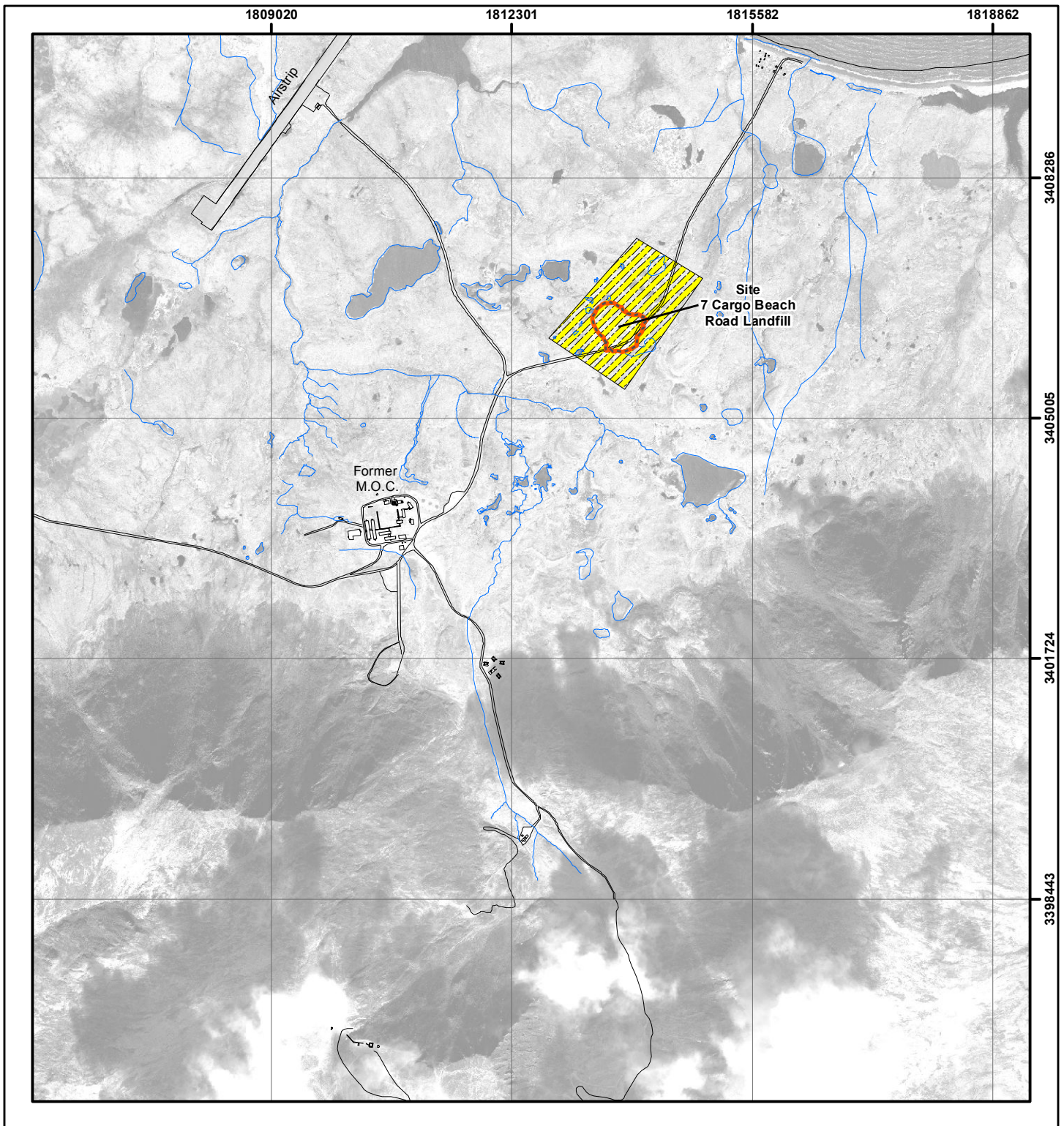
DATE:  
17 JUN 2014





PROJECT MANAGER:  
K. MAHER

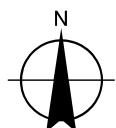
FIGURE NO.:  
A-1



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-  Site Location
-  Surface Water Feature
-  Roads and Buildings
-  Non-Drinking Water Area



All Locations Are Approximate

0 0.25 0.5

Miles

NAD 1983 StatePlane Alaska 9 FIPS 5009 Feet

**NORTHEAST CAPE**  
**SITE 7 - CARGO BEACH ROAD LANDFILL LOCATION**  
NORTH EAST CAPE, SAINT LAWRENCE ISLAND, ALASKA

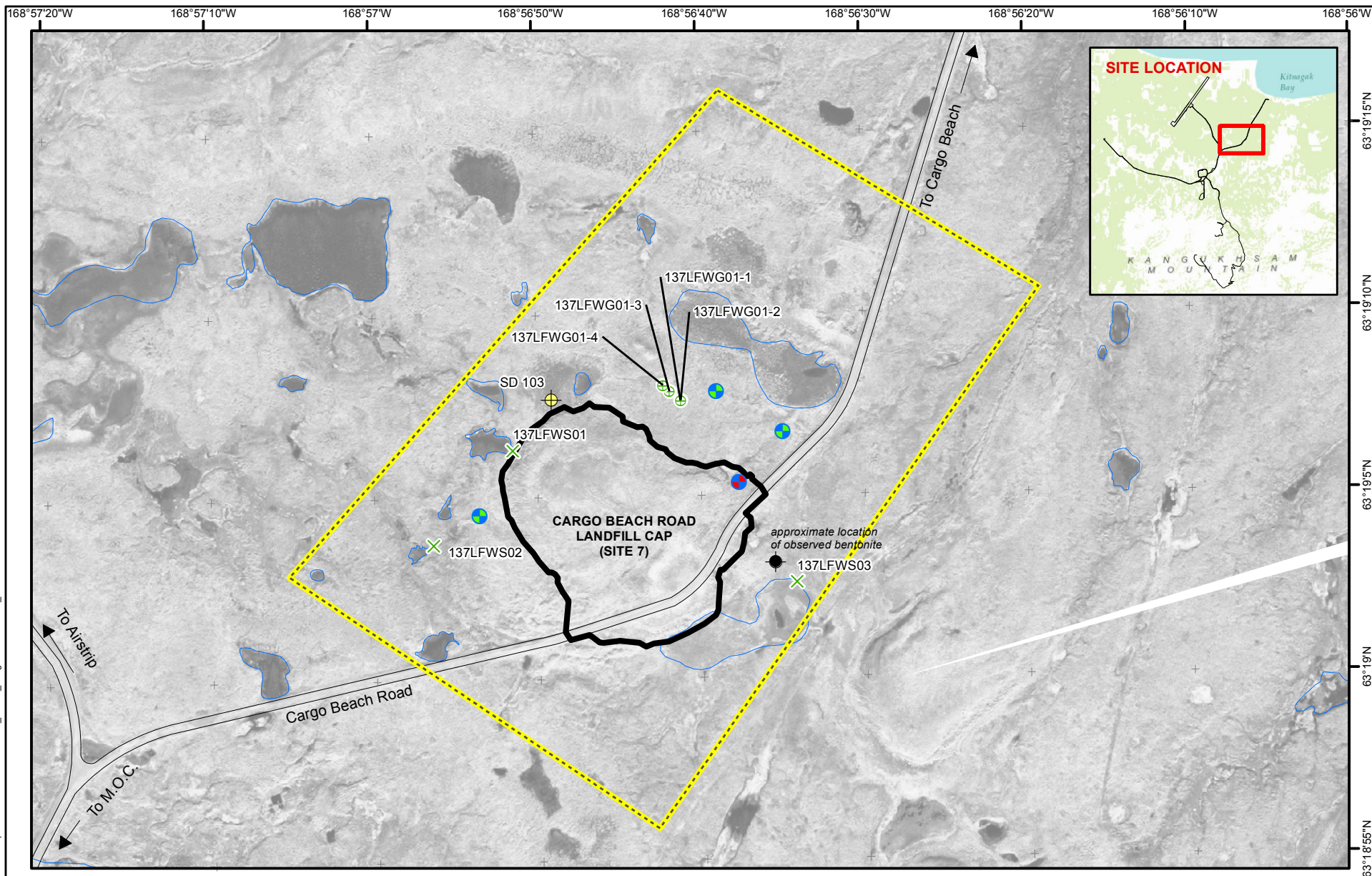
**JACOBS**

DATE:  
09 FEB 2015

PROJECT MANAGER:  
K. MAHER

FIGURE NO.:  
A-2





- ⊕ 2013 Attempted Groundwater Sample
- 2001 Historic Monitoring Well (Approx. Location)
- × 2013 Surface Water Sample
- ⊕ 1994 Historic Sediment Sample (approximate location)
- 1994 Historic Monitoring Well (Approx. Location)
- Approximate location of observed bentonite
- Non-Drinking Water
- Landfill Cap Boundary



All Locations Are Approximate

0 100 200 300 400  
Feet

NAD 1983 StatePlane Alaska 9 FIPS 5009 Feet

## NORTHEAST CAPE SITE 7 - CARGO BEACH LANDFILL

ST. LAWRENCE ISLAND, ALASKA

|               |                      |                              |                    |
|---------------|----------------------|------------------------------|--------------------|
| <b>JACOBS</b> | DATE:<br>17 JUN 2014 | PROJECT MANAGER:<br>K. MAHER | FIGURE NO.:<br>A-3 |
|---------------|----------------------|------------------------------|--------------------|

**APPENDIX B**  
**Cleanup Levels, Toxicity, and Risk Evaluation**

**U.S. Army Corps of Engineers  
Alaska District**

**SITE 7 CARGO BEACH ROAD LANDFILL  
FIRST PERIODIC REVIEW REPORT**

**NORTHEAST CAPE FUDS  
ST. LAWRENCE ISLAND, ALASKA**

**APPENDIX B  
CLEANUP LEVELS, TOXICITY, AND  
RISK EVALUATION**

**Formerly Used Defense Site F10AK0969-05**

**FINAL  
FEBRUARY 2015**

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## ACRONYMS AND ABBREVIATIONS

|       |   |
|-------|---|
| AAC   | Alaska Administrative Code                      |
| ADEC  | Alaska Department of Environmental Conservation |
| COC   | contaminant of concern                          |
| COPC  | contaminant of potential concern                |
| DD    | Decision Document                               |
| mg/kg | milligrams per kilogram                         |
| mg/L  | milligrams per liter                            |
| NA    | not applicable                                  |
| PCB   | polychlorinated biphenyl                        |
| TAH   | total aromatic hydrocarbon                      |
| TAqH  | total aqueous hydrocarbon                       |

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## **INTRODUCTION**

Updates to regulations and chemical-specific toxicity data may occur over time. The effects of those changes are evaluated as part of the technical assessment conducted for the Site 7 Cargo Beach Road Landfill Periodic Review to ensure the selected remedy remains protective of human health. The evaluation of regulatory updates involves a two-step process followed by the evaluation of chemical-specific toxicity data updates (risk evaluation), if necessary. The evaluation process summarized below is explained in greater detail in the Periodic Review Report.

- The evaluation begins by determining whether any contaminants of potential concern (COPC) or contaminants of concern (COC) have new or changed standards since the time of the Decision Document (DD) (USACE 2009). All compounds identified in the DD are presented in Table B-1, below. Additionally, any compounds detected during remedy implementation that exceed the cleanup levels listed in the applicable or relevant and appropriate regulations have been included; therefore, Table B-1 includes more compounds than the DD list of COPCs and COCs.
- If a new or more stringent standard was identified, the COPC or COC was evaluated further. No new or more stringent standards were identified for Site 7 Cargo Beach Road; therefore, no COPCs or COCs were carried forward for the risk evaluation.

## **ADEC CLEANUP LEVELS USED FOR SOIL**

For soil cleanup levels, the ADEC Method Two under 40-inch zone, migration to groundwater cleanup level (Title 18 of the Alaska Administrative Code [AAC], Chapter 75, Table B1), was applied for all compounds not listed in the DD as COCs. For those compounds listed as COCs, the cleanup level has either not changed or the site-specific values were calculated using a Method Four risk assessment.

## **CLEANUP LEVELS USED FOR SURFACE WATER**

For surface water cleanup levels, the strictest cleanup levels or standards listed in 18 AAC 70 were used.

**Table B-1**  
**Evaluation of Changes in Chemical-Specific Standards**

| COPCs/ COCs  | DD-<br>Established<br>RAO for<br>COCs | Source <sup>a</sup>                     | Current Alaska<br>Cleanup Level | Is There A<br>Newly<br>Promulgated<br>Cleanup Level<br>Since Previous<br>Review? | Is the New<br>Level More<br>Stringent than<br>the Previous<br>Standard? |
|--|---------------------------------------|---|---------------------------------|--|---|
| <b>Surface Water (mg/L)</b>                                      |                                       |   |                                 |  |   |
| Diesel-range<br>organics<br>C <sub>10</sub> to C <sub>25</sub>   | No Sheen                              | 18 AAC 70                               | --                              | No   | NA  |
| Residual-range<br>organics<br>C <sub>25</sub> to C <sub>36</sub> | No Sheen                              | 18 AAC 70                               | --                              | No   | NA  |
| Total aromatic<br>hydrocarbons                                   | 0.01                                  | 18 AAC 70                               | 0.01                            | No   | NA  |
| Total aqueous<br>hydrocarbons                                    | 0.015                                 | 18 AAC 70                               | 0.015                           | No   | NA  |
| <b>Soil (mg/kg)</b>  |                                       |   |                                 |  |   |
| Diesel-range<br>organics<br>C <sub>10</sub> to C <sub>25</sub>   | 9,200                                 | 18 AAC 75<br>Method 4<br>/site-specific | 250                             | No   | NA  |
| Residual-range<br>organics<br>C <sub>25</sub> to C <sub>36</sub> | 9,200                                 | 18 AAC 75<br>Method 4<br>/site-specific | 10,000                          | No   | NA  |
| Arsenic  | 11 <sup>b</sup>                       | Site-specific<br>Background             | 3.9                             | No   | NA  |
| PCBs (sum)   | 1                                     | 18 AAC 75                               | 1                               | No   | NA  |

**Notes:**

<sup>a</sup> Sources listed in the DD include the following:

18 AAC 75 Table C;

18 AAC 75 Table B1;

18 AAC 75 Method 4 risk-based residential cleanup level from the *Feasibility Study* (U.S. Army Corps of Engineers 2007)

<sup>b</sup> DD-specified limit based on elevated background concentrations.

## REFERENCES

- ADEC (Alaska Department of Environmental Conservation). 2008 (June). *Cleanup Levels Guidance*. Division of Spill Prevention and Response. Contaminated Sites Program.
- U.S. Army Corps of Engineers. 2009 (June). Decision Document: *Site 7 Cargo Beach Road Landfill, Containerized Hazardous, Toxic, and Radioactive Waste (CON-HTRW) Project #F10AK096905, Northeast Cape Formerly Used Defense Site (FUDS)*. St. Lawrence Island, Alaska. Prepared by USACE-Alaska District, June 2009.
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**APPENDIX C**  
**Site Inspection Checklists and Logbook**



## Five-Year Review Site Inspection Checklist

| I. SITE INFORMATION   |   |
|---|---|
| Site name: <u>Site 7 - Cargo Beach Road</u>   | Date of Inspection: <u>9/13/13</u>                              |
| Location and Region: <u>NE Cape landfill</u>  | EPA ID: <u>AK9799F2999</u>                                      |
| Agency, office, or company leading the five-year review: <u>USACE</u>   | Weather/temperature: <u>Overcast ~40°F</u>                      |
| Remedy Includes: (Check all that apply)   |   |
| <input checked="" type="checkbox"/> Landfill cover/containment  | <input type="checkbox"/> Monitored natural attenuation          |
| <input type="checkbox"/> Access controls  | <input type="checkbox"/> Groundwater containment                |
| <input type="checkbox"/> Institutional controls   | <input type="checkbox"/> Vertical barrier walls                 |
| <input type="checkbox"/> Groundwater pump and treatment   | <input type="checkbox"/> Surface water collection and treatment |
| <input checked="" type="checkbox"/> Other: <u>Capping with land use controls</u>  |   |
| Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input type="checkbox"/> Site map attached   |   |
| II. INTERVIEWS (CHECK ALL THAT APPLY)   |   |
| 1. O&M site manager <u>NONE</u> <u>NONE</u>   |   |
| Name Title Date   |   |
| Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone (Phone no. _____)   |   |
| Problems, suggestions ( <input type="checkbox"/> Report attached) _____   |   |
| 2. O&M staff <u>NONE</u> <u>NONE</u>  |   |
| Name Title Date   |   |
| Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone (Phone no. _____)   |   |
| Problems, suggestions ( <input type="checkbox"/> Report attached) _____   |   |
| 3. Local regulatory authorities and response agencies (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply. |   |
| Agency <u>ADEC</u>  |   |
| Contact <u>Curtis Dunkin</u> <u>Project Manager</u> <u>01/2014</u>  |   |
| Name Title Date   |   |
| Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone (Phone no. _____)   |   |
| Problems, suggestions ( <input checked="" type="checkbox"/> Report attached) _____  |   |
| Agency _____  |   |
| Contact _____   |   |
| Name Title Date   |   |
| Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone (Phone no. _____)   |   |
| Problems, suggestions ( <input type="checkbox"/> Report attached) _____   |   |
| 4. Other interviews (optional) ( <input checked="" type="checkbox"/> Report attached) _____   |   |
| _____   |   |
| _____   |   |
| _____   |   |



## III. ONSITE DOCUMENTS &amp; RECORDS VERIFIED

## 1. O&amp;M Documents

O&amp;M manual

☐ Readily available☐ Up to date☒ N/A

As-built drawings

☐ Readily available☐ Up to date☒ N/A

Maintenance logs

Doc

☐ Readily available☐ Up to date☒ N/ARemarks: Record of Decision used for site information and site maps.

## 2. Site-Specific Health and Safety Plan

☐ Readily available☐ Up to date☒ N/A

Contingency plan/emergency response plan

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 3. O&amp;M and OSHA Training Records

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 4. Permits and Service Agreements

Air discharge permit

☐ Readily available☐ Up to date☒ N/A

Effluent discharge

☐ Readily available☐ Up to date☒ N/A

Waste disposal, POTW

☐ Readily available☐ Up to date☒ N/A

Other permits: \_\_\_\_\_

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 5. Gas Generation Records

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 7. Groundwater Monitoring Records

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 8. Leachate Extraction Records

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 9. Discharge Compliance Records

Air

☐ Readily available☐ Up to date☒ N/A

Water (effluent)

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## 10. Daily Access/Security Logs

☐ Readily available☐ Up to date☒ N/A

Remarks: \_\_\_\_\_

## IV. O&amp;M COSTS

## 1. O&amp;M Organization

- ☐ State in-house  
☐ PRP in-house  
☐ Federal Facility in-house  
☒ Other USACE
- ☐ Contractor for State  
☐ Contractor for PRP  
☐ Contractor for Federal Facility

## 2. O&amp;M Cost Records

- ☐ Readily available  
☐ Funding mechanism/agreement in place  
☒ Up to date 6-54 reviews  
 Original O&M cost estimate \$5851,587 → for all NE Cape Sites Breakdown attached

## Total annual cost by year for review period if available

|            |          |            |                    |
|------------|----------|------------|--------------------|
| From _____ | To _____ | _____      | Breakdown attached |
| Date       | Date     | Total cost |                    |
| From _____ | To _____ | _____      | Breakdown attached |
| Date       | Date     | Total cost |                    |
| From _____ | To _____ | _____      | Breakdown attached |
| Date       | Date     | Total cost |                    |
| From _____ | To _____ | _____      | Breakdown attached |
| Date       | Date     | Total cost |                    |
| From _____ | To _____ | _____      | Breakdown attached |
| Date       | Date     | Total cost |                    |

## 3. Unanticipated or Unusually High O&amp;M Costs During Review Period

Describe costs and reasons: NOT AVAILABLE NONE

## V. ACCESS AND INSTITUTIONAL CONTROLS

☒ Applicable      ☐ N/A

## A. Fencing

## 1. Fencing damaged

- ☐ Location shown on site map  
☐ Gates secured  
☒ N/A

Remarks \_\_\_\_\_

## B. Other Access Restrictions

## 1. Signs and other security measures

- ☐ Location shown on site map  
☒ N/A

Remarks Site 7 cargo beach landfill has existing remedy includes land use controls to ensure no buildings are constructed on landfillcap and to prevent use of groundwater. Site 7 is located on Village property on a remote island. There is currently no road access to site from either on-island Village.

WCS in progress



## VI. GENERAL SITE CONDITIONS

A. Landfill Surface ☒ Applicable ☐ N/A

1. Roads damaged
- ☒
- Location shown on site map
- ☒
- Roads adequate
- ☐
- N/A

Remarks Cargo beach Road crosses over landfill cap.

## B. Other Site Conditions

Remarks \_\_\_\_\_

## VII. LANDFILL COVERS

☒ Applicable ☐ N/A

## A. Landfill Surface

1. Settlement (Low spots)
- ☐
- Location shown on site map
- ☒
- Settlement not evident

Areal extent \_\_\_\_\_ Depth \_\_\_\_\_

Remarks \_\_\_\_\_

2. Cracks
- ☐
- Location shown on site map
- ☒
- Cracking not evident

Lengths \_\_\_\_\_ Widths \_\_\_\_\_ Depths \_\_\_\_\_

Remarks \_\_\_\_\_

3. Erosion
- ☐
- Location shown on site map
- ☒
- Erosion not evident

Areal extent \_\_\_\_\_ Depth \_\_\_\_\_

Remarks \_\_\_\_\_

4. Holes
- ☐
- Location shown on site map
- ☒
- Holes not evident

Areal extent \_\_\_\_\_ Depth \_\_\_\_\_

Remarks \_\_\_\_\_

5. Vegetative Cover
- ☒
- Grass Cover properly established
- ☐
- No signs of stress

☐ Trees/Shrubs (indicate size and locations on a diagram)Remarks Soil is very coarse making vegetative growth difficult

6. Alternative Cover (armored rock, concrete, etc.)
- ☐
- N/A

Remarks Southern border of cap consist of armored rock on slope.

7. Bulges
- ☐
- Location shown on site map
- ☒
- Bulges not evident

Areal extent \_\_\_\_\_ Height \_\_\_\_\_

Remarks \_\_\_\_\_

8. Wet Areas/Water Damage
- ☒
- Wet areas/water damage not evident

☐ Wet areas location shown on site map Areal extent \_\_\_\_\_☐ Ponding location shown on site map Areal extent \_\_\_\_\_☐ Seeps location shown on site map Areal extent \_\_\_\_\_☐ Soft subgrade location shown on site map Areal extent \_\_\_\_\_

Remarks \_\_\_\_\_

## 9. Slope Instability

☐ Slides☐ Location shown on site map☒ No evidence of slope instability

Areal extent \_\_\_\_\_

Remarks \_\_\_\_\_

**B. Benches**☐ Applicable☒ N/A

(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)

1. **Flows Bypass Bench**☐ Location shown on site map☐ N/A or okay

Remarks \_\_\_\_\_

2. **Bench Breached**☐ Location shown on site map☐ N/A or okay

Remarks \_\_\_\_\_

3. **Bench Overtopped**☐ Location shown on site map☐ N/A or okay

Remarks \_\_\_\_\_

**C. Letdown Channels**☐ Applicable☒ N/A

(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)

1. **Settlement**☐ Location shown on site map☐ No evidence of settlement

Areal extent \_\_\_\_\_

Depth \_\_\_\_\_

Remarks \_\_\_\_\_

2. **Material Degradation**☐ Location shown on site map☐ No evidence of degradation

Material type \_\_\_\_\_

Areal extent \_\_\_\_\_

Remarks \_\_\_\_\_

3. **Erosion**☐ Location shown on site map☐ No evidence of erosion

Areal extent \_\_\_\_\_

Depth \_\_\_\_\_

Remarks \_\_\_\_\_

4. **Undercutting**☐ Location shown on site map☐ No evidence of undercutting

Areal extent \_\_\_\_\_

Depth \_\_\_\_\_

Remarks \_\_\_\_\_

5. **Obstructions** Type \_\_\_\_\_☐ No obstructions☐ Location shown on site map

Areal extent \_\_\_\_\_

Size \_\_\_\_\_

Remarks \_\_\_\_\_

6. **Excessive Vegetative Growth**

Type \_\_\_\_\_

☐ No evidence of excessive growth☐ Vegetation in channels does not obstruct flow☐ Location shown on site map

Areal extent \_\_\_\_\_

Remarks \_\_\_\_\_

- D. Cover Penetrations**    ☐ Applicable    ☒ N/A
1. **Gas Vents**    ☐ Active    ☐ Passive    ☐ Properly secured/locked  
                          ☐ Functioning    ☐ Routinely sampled    ☐ Good condition  
                          ☐ Needs maintenance    ☐ Evidence of leakage at penetration  
                          ☐ N/A

Remarks \_\_\_\_\_

2. **Gas Monitoring Probes**  
                          ☐ Properly secured/locked    ☐ Functioning    ☐ Routinely sampled  
                          ☐ Good condition    ☐ Evidence of leakage at penetration  
                          ☐ Needs maintenance    ☒ N/A

Remarks \_\_\_\_\_

3. **Monitoring Wells** (within surface area of landfill)  
                          ☐ Properly secured/locked    ☐ Functioning    ☐ Routinely sampled  
                          ☐ Good condition    ☐ Evidence of leakage at penetration  
                          ☐ Needs Maintenance    ☒ N/A

Remarks \_\_\_\_\_

4. **Leachate Extraction Wells**  
                          ☐ Properly secured/locked    ☐ Functioning    ☐ Routinely sampled  
                          ☐ Good condition    ☐ Evidence of leakage at penetration  
                          ☐ Needs Maintenance    ☒ N/A

Remarks \_\_\_\_\_

5. **Settlement Monuments**    ☐ Located    ☐ Routinely surveyed    ☐ N/A

Remarks \_\_\_\_\_

- E. Gas Collection and Treatment**    ☐ Applicable    ☒ N/A

1. **Gas Treatment Facilities**  
                          ☐ Flaring    ☐ Thermal destruction    ☐ Collection for reuse  
                          ☐ Good condition    ☐ Needs Maintenance    ☐ N/A

Remarks \_\_\_\_\_

2. **Gas Collection Wells, Manifolds and Piping**  
                          ☐ Good condition    ☐ Needs Maintenance    ☒ N/A

Remarks \_\_\_\_\_

3. **Gas Monitoring Facilities** (e.g., gas monitoring of adjacent homes or buildings)  
                          ☐ Good condition    ☐ Needs Maintenance    ☒ N/A

Remarks \_\_\_\_\_



|   |  |                                      |   |
|---|--|--------------------------------------|---|
| <b>F. Cover Drainage Layer</b>  |  | <input type="checkbox"/> Applicable  | <input checked="" type="checkbox"/> N/A |
| 1. <b>Outlet Pipes Inspected</b>  |  | <input type="checkbox"/> Functioning | <input checked="" type="checkbox"/> N/A |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| 2. <b>Outlet Rock Inspected</b>   |  | <input type="checkbox"/> Applicable  | <input checked="" type="checkbox"/> N/A |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| <b>G. Detention/Sedimentation Ponds</b>   |  | <input type="checkbox"/> Applicable  | <input checked="" type="checkbox"/> N/A |
| 1. <b>Siltation</b> Areal extent _____ Depth _____  |  | (N/A)                                |   |
| <input type="checkbox"/> Siltation not evident  |  |                                      |   |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| 2. <b>Erosion</b> Areal extent _____ Depth _____  |  |                                      |   |
| <input type="checkbox"/> Erosion not evident  |  |                                      |   |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| 3. <b>Outlet Works</b>  |  | <input type="checkbox"/> Applicable  | <input checked="" type="checkbox"/> N/A |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| 4. <b>Dam</b>   |  | <input type="checkbox"/> Applicable  | <input checked="" type="checkbox"/> N/A |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| <b>H. Retaining Walls</b>   |  | <input type="checkbox"/> Applicable  | <input checked="" type="checkbox"/> N/A |
| 1. <b>Deformations</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Deformation not evident |  |                                      |   |
| Horizontal displacement _____ Vertical displacement _____   |  |                                      |   |
| Rotational displacement _____   |  |                                      |   |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |
| 2. <b>Degradation</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Degradation not evident  |  |                                      |   |
| Remarks _____   |  |                                      |   |
|   |  |                                      |   |

|   |                 |  |
|---|-----------------|--|
| <b>I. Perimeter Ditches/Off-Site Discharge</b> <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A  |                 |  |
| <b>1. Siltation</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Siltation not evident  |                 |  |
| Areal extent _____  | Depth _____     |  |
| Remarks _____   |                 |  |
|   |                 |  |
| <b>2. Vegetative Growth</b> <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> N/A<br><input type="checkbox"/> Vegetation does not impede flow |                 |  |
| Areal extent _____  | Type _____      |  |
| Remarks _____   |                 |  |
|   |                 |  |
| <b>3. Erosion</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Erosion not evident  |                 |  |
| Areal extent _____  | Depth _____     |  |
| Remarks _____   |                 |  |
|   |                 |  |
| <b>4. Discharge Structure</b> <input type="checkbox"/> Functioning <input checked="" type="checkbox"/> N/A  |                 |  |
| Remarks _____   |                 |  |
|   |                 |  |
| <b>VIII. VERTICAL BARRIER WALLS</b>   |                 |  |
| <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A   |                 |  |
| <b>1. Settlement</b> Location <u>shown</u> on site map    Settlement not evident  |                 |  |
| Areal extent _____  | Depth _____     |  |
| Remarks: _____  |                 |  |
|   |                 |  |
| <b>2. Performance Monitoring</b>  |                 |  |
| Type of monitoring _____  |                 |  |
| <input type="checkbox"/> Performance not monitored  | Frequency _____ |  |
| <input type="checkbox"/> Evidence of breaching  |                 |  |
| Head differential _____   |                 |  |
| Remarks: _____  |                 |  |

## IX. GROUNDWATER/SURFACE WATER REMEDIES

☒ Applicable ☐ N/AA. Groundwater Extraction Wells, Pumps, and Pipelines ☐ Applicable ☒ N/A

## 1. Pumps, Wellhead Plumbing, and Electrical

- ☐ Good condition ☐ All required wells properly operating  
☐ Needs Maintenance ☒ N/A

Remarks An abandoned well location was observed on southern side of Site. 9/13/13

## 2. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances

- ☐ Good condition ☐ Needs Maintenance

Remarks NOT APPLICABLE

## 3. Spare Parts and Equipment

- ☐ Readily available ☐ Good condition  
☐ Requires upgrade ☐ Needs to be provided

Remarks NOT APPLICABLE

B. Surface Water Collection Structures, Pumps, and Pipelines Applicable ☒ N/A

## 1. Collection Structures, Pumps, and Electrical

- ☐ Good condition ☐ Needs Maintenance

Remarks \_\_\_\_\_

## 2. Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances

- ☐ Good condition ☐ Needs Maintenance

Remarks \_\_\_\_\_

## 3. Spare Parts and Equipment

- ☐ Readily available ☐ Good condition  
☐ Requires upgrade ☐ Needs to be provided

Remarks \_\_\_\_\_



**C. Treatment System Applicable** ☒ N/A**1. Treatment Train** (Check components that apply)

- ☐ Metals removal      ☐ Oil/water separation      ☐ Bioremediation  
☐ Air stripping      ☐ Carbon adsorbers  
☐ Filters \_\_\_\_\_  
☐ Additive (e.g., chelation agent, flocculent) \_\_\_\_\_  
☐ Others \_\_\_\_\_  
☐ Good condition      ☐ Needs Maintenance  
☐ Sampling ports properly marked and functional  
☐ Sampling/maintenance log displayed and up to date  
☐ Equipment properly identified  
☐ Quantity of groundwater treated annually \_\_\_\_\_  
☐ Quantity of surface water treated annually \_\_\_\_\_

Remarks \_\_\_\_\_

**2. Electrical Enclosures and Panels** (properly rated and functional)

- ☒ N/A      ☐ Good condition      ☐ Needs Maintenance

Remarks \_\_\_\_\_

**3. Tanks, Vaults, Storage Vessels**

- ☒ N/A      ☐ Good condition  
☐ Proper secondary containment      ☐ Needs Maintenance

Remarks \_\_\_\_\_

**4. Discharge Structure and Appurtenances**

- ☒ N/A      ☐ Good condition      ☐ Needs Maintenance

Remarks \_\_\_\_\_

**5. Treatment Building(s)**

- ☒ N/A      ☐ Good condition (esp. roof and doorways)      ☐ Needs repair  
☐ Chemicals and equipment properly stored

Remarks \_\_\_\_\_

**6. Monitoring Wells** (pump and treatment remedy)

- ☐ Properly secured/locked      ☐ Functioning      ☐ Routinely sampled  
☐ Good condition      ☐ All required wells located      ☐ Needs Maintenance

☒ N/A

Remarks One abandoned well location was observed on site. WAS NOT PART OF A TREATMENT SYSTEM. Bentonite used. 9/16/13

**D. Monitoring Data**

NOT APPLICABLE

**1. Monitoring Data**

- ☐ Is routinely submitted on time      ☐ Is of acceptable quality

**2. Monitoring data suggests:**

- ☐ Groundwater plume is effectively contained      ☐ Contaminant concentrations are declining

**E. Monitoring Natural Attenuation****1. Monitoring Wells (natural attenuation remedy)**

- ☐ Properly secured/locked    ☐ Functioning    ☐ Routinely sampled  
☐ Good condition    ☐ All required wells located    ☐ Needs Maintenance

☒ N/A

Remarks One abandoned well location left 9/13/13  
observed onsite

**X. OTHER REMEDIES**

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

**XI. OVERALL OBSERVATIONS****A. Implementation of the Remedy**

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

The remedy at Site 7 Cargo beach Road  
landfill was intended to place a 2' cap over  
the landfill and implement land use controls.  
The selected remedy is effective in general.  
The cap remains in good condition however  
debris was noted along the perimeter. There  
was a small amount of debris protruding  
from the cap on the southern side near  
the armored rock. Debris was also observed in  
the nearby ponds.

**B. Adequacy of O&M**

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

Site 7 has been graded to promote positive  
drainage and mitigate erosion.

**C. Early Indicators of Potential Remedy Problems**

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future.

NONE OBSERVED.

**D. Opportunities for Optimization**

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.

Add additional fill to the southern side of the cap to ensure a 2' cover. Remove additional debris remaining outside of cap including a few rusted 55gal drums.

Implement LUCS, obtain 18 AAC 75.350 formal documentation/approval

7-5  
7-5 9/13/13

SSG training +  
SSG review  
Bentonite well  
mention drainage  
ditch condition

p23  
p116  
p24  
p26

9/13/13



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ISBN: 978-1-932149-87-6

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6 3 2 2 8 1 3 7 3 1 1 7

NE CAPE 5-YR REVIEW  
LOGBOOK #11 SITE NOTES

9/11/13 TO 9/16/13



*Rite in the Rain*

ALL-WEATHER  
**UNIVERSAL**

No 373

C. FELL  
J. ORCZEWSKI  
K. MAHER

HTRW-107-05F45902-H04-0001  
05F45902

Did you remember ... ???

### Daily Logbook Checklist

- ☐ Project name / Site ID / Client
- ☐ Date
- ☐ Weather, site conditions, and other salient observations
- ☐ Level of PPE used
- ☐ Full names of onsite personnel and affiliations (including all visitors)
- ☐ Daily objectives
- ☐ Field measurements and calibrations
- ☐ Time and location of activity
- ☐ Field observations and comments
- ☐ Deviations from the Work Plan
- ☐ Site photographs
- ☐ Site sketches (with reference i.e. "N" arrow)
- ☐ Survey and location i.e. samples or debris (GPS coordinates when possible)
- ☐ For each sample record:
  - Date, time, sampler(s)
  - Sample ID
  - Media, container(s), preservatives
  - QC (dup/MS/MSD)
  - Analysis
  - MeOH lot #
  - Tare weight
- ☐ Sample shipments (when, what, destination)
- ☐ Waste tracking (when, how much, destination)
- ☐ Daily summary of activities (i.e. # of samples collected)



LOGBOOK #1 SITE NOTES

*Rite in the Rain*  
ALL-WEATHER WRITING PAPER

DCU

HTRW-J07-05F45902-H04-0001

Name JACOBS ENGINEERING

Address 4300 B STREET SUITE 600  
ANCHORAGE AK 99503

Phone 907 563 3322

Project NE CAPE 5-YR REVIEW  
05F45902

C. FELL

J. ORCZEWSKI

K. MAHER

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| 20-21    | DAY 3: SITE 31 SITE WALK (WACS)                         | 9/13/13   |
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| 50       | SITE 15 SITE WALK (FUEL PIPELINE)                       | 9/15/13   |
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NE CAPE, 5-YR REVIEW, USACE

9/11/13

~1240 LEFT HOME FOR NE CAPE ON BERING AIR  
~1400 ARRIVED AT BRISTOL ENG. CAMP ON NE CAPE

SITE ORIENTATION W/ CHUCK CROLEY

PERSONNEL (LEVEL D PPE)

|         |              |            |
|---------|--------------|------------|
| JACOBS  | K. MAHER     | P.M.       |
| JACOBS  | J. ORCZEWSKA | BIOLOGIST  |
| JACOBS  | C. FELL      | GEOLOGIST  |
| BRISTOL | C. CROLEY    | SITE SUPER |
| USACE   | J. CRANER    | QAR        |

1430 GOT SITUATED IN LODGING AND PREPARED  
SOME OF THE FIELD GEAR  
↳ GEL ICE IN FREEZER  
↳ ONLY 12 COOLERS → SPACE ISSUE?

NOTE PLAN TO SPEND REMAINDER OF DAY  
SCOUTING SITES AND FLAGGING SAMPLING  
LOCATIONS

WX: MOSTLY CLOUDY TO OVERCAST  
SOUTH WIND 5-10 mph temp mid 40s

Scale: 1 square =

PAGE 1

Write in the Rain.

9/11/13 NE CAPE  
S-YR REVIEW USAGE

1521 SITE DRIVE W/ THE CAR (USAGE)  
↳ SITE 8 IS THE LOW LYING AREA ALONG  
THE RIGHT SIDE OF THE ROAD (CAMP)  
↳ SITE 7 IS THE THICKLY VEGETATED HILL  
LEFT FROM SITE 8  
↳ SITE 6 IS WHERE INTERMODAL CONTAINERS  
ARE STAGED  
↳ SITE 3 IS ON THE RIGHT JUST BEFORE BEACH  
↳ SITE 4 IS ON THE LEFT JUST BEFORE BEACH  
↳ SITE 5 IS ON THE BEACH

NOTE MARK BOUNDARIES OF SITES WHERE  
OBSERVED OR MAKE SKETCHES

1612 ↳ SITE 9 IS THE BARE AREA ON LEFT  
SIDE OF ROAD JUST BEFORE INTERMODAL CONTAINER  
STAGING AREA ON THE RIGHT  
↳ SITE 10 IS THE NEWLY GRADED AREA JUST PAST  
CONTAINER STAGING AREA  
↳ SITE 11 IS THE NEWLY DISTURBED AREA JUST  
DOWNHILL OF THE <sup>CF</sup> 11/13 SITE 10  
↳ SITE 28 IS THE LOW AREA BELOW SITE 10  
↳ SITE 31 & 32 ARE UP THE ROAD TOWARD QUARRIES  
↳ 32 IS FOUNDATION AT BASE OF HILL

Scale: 1 square = \_\_\_\_\_

PAGE 2

NE CAPE  
S-YR REVIEW USAGE 9/11/13

1711 ↳ SITE 16 IS ESSENTIALLY AT THE GAC STATION  
JUST BEFORE THE GAC STATION

\* DIRECTIONS ARE BASED ON COMING FROM CAMP

1742 END OF SITE WALK

1745 TO DINNER

1815

1820 GEAR ORGANIZATION & COOLER PREP

| Butte Count                     | From WP | US 19       |
|---------------------------------|---------|-------------|
| Coolers = 12                    |         |             |
| 250 HNO <sub>3</sub> Polys = 33 | 3 35    | Flask found |
| 1 L HCL = 35                    | 5 30    | 710         |
| 1 L No pres = 1240              | 50 45   |             |
| 40 mL HCL VOA = 128             | 60      |             |

Per cooler Sample Location

- Ground water + SW

- 6 x 40 mL VOA

- 2 x 1 L HCL amber

- 3 x 1 L No pres amber

- 2 x 250 mL HNO<sub>3</sub> [Flask found]

2005 END OF DAY

Scale: 1 square = \_\_\_\_\_

PAGE 3

Rite in the Rain



NE CAPE  
5-YEAR REVIEW

USACE  
9/12/13

0655 HEALTH AND SAFETY MEETING (BRISTOL)

0715 DAILY TAIL GATE (JACOBS)

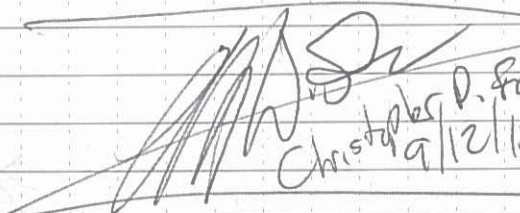
↳ PERSONNEL (LEVEL D PPE)

|        |              |           |
|--------|--------------|-----------|
| JACOBS | K. MAHER     | SITE LEAD |
| JACOBS | C. FELL      | SSHO/TECH |
| JACOBS | J. ORCZEWSKA | TECH      |

WX: PARTLY TO MOSTLY CLOUDY  
35°F TO 40°F  
CALM TO LIGHT BREEZE

0752 DAILY OBJECTIVES:

- COMPLETE GW/SURFACE WATER SAMPLING
- SITE WALKS FOR SITE 7 & 9 (LANDFILL)

  
Christopher D. Fell  
9/12/13

Scale: 1 square = \_\_\_\_\_

PAGE 4

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

0754 TURBIDIMETER (S/N 6192)

↳ CALIBRATED ON 9/6/13 BY TIT ENVIRO

0905 YSI (S/N 100449) CALIBRATION VERIFICATION

↳ CALIBRATED ON 9/6/13 BY TIT ENVIRO

↳ BAROMETER CAL: 29.72 inHg

↳ CAL VERIFICATION

→ ORP: 240mV exp. 12/17 = 256.8mV OK

→ COND: 1413 <sup>25°C</sup>  $\mu\text{m/cm}$  / 1020  $\mu\text{m/cm}$  = 9.29 OK

→ pH 7.0: 6.95 OK

→ pH 10.01: 10.01 OK

→ pH 4.01: 3.95 OK

0940 LOADED SUPPLIES IN PICKED AND  
TRAVELLED TO SITE 9

0945 ARRIVED AT SITE 9 LANDFILL

↳ BEGAN SAMPLING PROCEDURE AT  
LOCATIONS 9LF-WS01 &  
9LF-WS02

0950 ADVANCED DRIVE POINT

Scale: 1 square = \_\_\_\_\_

PAGE 5

*Rite in the Rain*



NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1000 \*SAMPLE: 13-9LF-WS01-0  
PRIMARY  
MS/MSD

↳ COLLECTED WITH DEDICATED DIPPER  
↳ 4 40ml VOAs (HCl) AK101/BTEX SW8260  
unfiltered ↳ 1 250poly (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY  
filtered ↳ 1 250poly (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

CF/KM/JO ↳ 2 IL AMBER (HCl) AK102/AK103  
↳ 3 IL AMBER (none) SW8270 SIM/SW8082  
→ SURFACE WATER

X 3 FOR MS/MSD  
— FILTERED METALS COLLECTED W/PERISTALTIC

1000 \*SAMPLE: 13-9LF-WS02-0  
↳ COLLECTED WITH DEDICATED DIPPER

DUPLICATE ↳ 4 40ml VOAs (HCl) AK101/BTEX SW8260  
unfiltered ↳ 1 250poly (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY  
filtered ↳ 1 250poly (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

CF/KM/JO ↳ 2 IL AMBER (HCl) AK102/AK103  
↳ 3 IL AMBER (none) SW8270 SIM/SW8082  
→ SURFACE WATER

— FILTERED METALS COLLECTED W/PERISTALTIC

1135 FINISHED SAMPLING 9LF-WS01  
9LF-WS02

\* SAMPLES MAINTAINED AT  $4 \pm 2^{\circ}\text{C}$  AFTER  
COLLECTION

Scale: 1 square = \_\_\_\_\_

PAGE 6

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1149 BEGAN SAMPLING PROCEDURE AT  
LOCATION 9LF-SW03

1155 \*SAMPLE: 13-9LF-WS03-0  
CF/KM/JO PRIMARY  
↳ COLLECTED WITH DEDICATED DIPPER  
↳ 4 40ml VOAs (HCl) AK101/SW8260

unfiltered ↳ 1 250poly (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY  
filtered ↳ 1 250poly (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

↳ 2 IL AMBER (HCl) AK102/AK103  
↳ 3 IL AMBER (none) SW8270 SIM/SW8082  
→ SURFACE WATER

→ FILTERED METALS COLLECTED W/PERISTALTIC

1211 FINISHED SAMPLING AT LOCATION  
9LF-WS03

1212 SAMPLING LOCATIONS ARE  
RECORDED ON APPENDIX A FIGURES  
IN THE WORK PLAN (FIELD COPY)  
AND ON PAGE 8

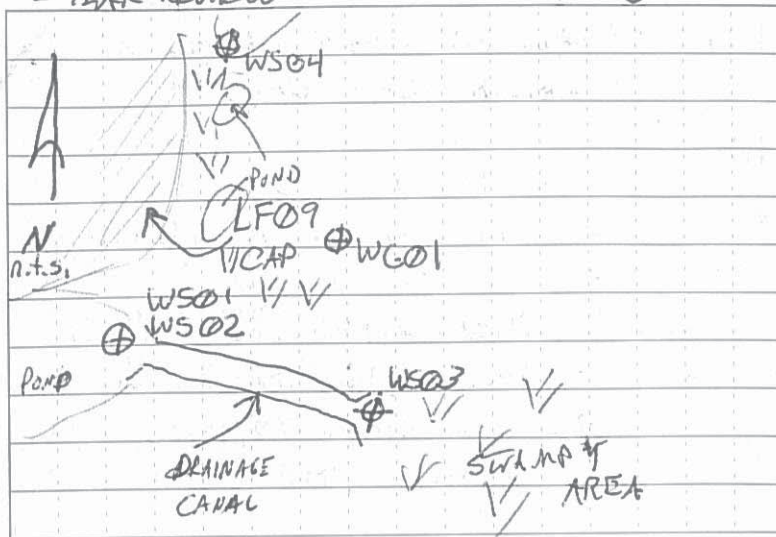
1215 LEFT FOR LUNCH

Scale: 1 square = \_\_\_\_\_

PAGE 7 *Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13



1305 HEADED BACK TO SITE

1310 ADVANCED DRIVE POINT AT  
SITE 7 LAND FILL

↳ REFUSAL AT APPROX 4-6 INCHES 365

↳ STEPPED OUT APPROX. 1 FT → REFUSAL AT 6 IN

↳ STEPPED OUT APPROX 10 FT NORTH → REFUSAL AT 6 IN

↳ STEPPED OUT APPROX 20 FT NORTH → REFUSAL AT 30 IN

1340 BEGAN SAMPLING AT 9LF-WG01

1348 BEGAN SAMPLING PROCEDURE AT  
LOCATION 9LF-WS04

Scale: 1 square =

PAGE 8

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1350 \*SAMPLE: 13-9LF-WS04-0

PRIMARY  
↳ COLLECTED W/ DEDICATED  
DIPPER, FILTERED METALS  
COLLECTED W/ PERISTALTIC  
↳ 4 40ml VOAs (HCL) AK101/SW8260 (BTEX)  
↳ 2 1L AMBER (HCL) AK102/AK103  
FILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY  
UNFILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY  
↳ 3 1L AMBER (none) SW8270 SIM/SW8082  
→ SURFACE WATER

1351 \*SAMPLE: 13-9LF-WS04-1

PRIMARY  
13-9LF-WG01-2  
↳ COLLECTED W/ PERISTALTIC PUMP

1416 ↳ 4 40ml VOAs (HCL) AK101/SW8260 (BTEX)  
1550 FILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY  
↳ 250ml POLY (HNO<sub>3</sub>) 9/12

Christopher D Fell  
9/12/13

Scale: 1 square =

PAGE 9

Rite in the Rain



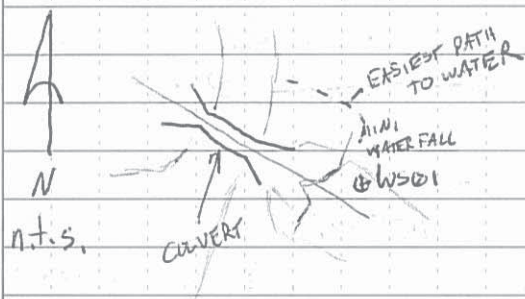
NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1437 GROUNDWATER GRAB SAMPLING AT  
LOCATION 9LF-WG01  
- WATER EXTREMELY TURBID W/  
SILT/FINE SAND & ORGANICS.  
- SCREEN CONTINUALLY PLUGS WITH  
FINE ORGANICS & SEDIMENT  
- PRODUCTION RATE MUCH LOWER  
THAN 250ml/min  
- 4 40ml VOAs IN ONE HOUR

1450 FINISHED SAMPLING 9LF-WS04

1504 ARRIVED AT KANGUKSHAM MOUNTAIN  
SPRING SAMPLING LOCATION (KMS)



Scale: 1 square = \_\_\_\_\_

PAGE 10

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1516 STARTED SAMPLING PROCEDURE  
AT THE KANGUKSHAM MOUNTAIN  
SPRING

1521 \*SAMPLE: 13-KMS-WS01-0

PRIMARY

CF/JO

↳ COLLECTED WITH DEDICATED DIPPER,  
FILTERED ~~W/~~ <sup>CF</sup> 9/12 METALS COLLECTED  
WITH PERISTALTIC PUMP

↳ 4 40ml VOAs (HCl) AK101/SWB260(BTEX)

↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 PCRA METALS SW 7471 MERCURY

↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 PCRA METALS SW 7471 MERCURY

↳ 2 1L AMBER (HCl) AK102/AK103

↳ 3 1L AMBER (none) SWB27051N/SWB2082

→ SURFACE WATER

1539 FINISHED SAMPLING AT  
KANGUKSHAM MOUNTAIN SPRING

1550 FINISHED SAMPLING AT  
~~9LF-WS01~~ <sup>CF</sup> 9/12  
9LF-WG01-2 DUE TO EXTREMELY  
LOW WATER PRODUCTION FROM THE  
WELL POINT

Scale: 1 square = \_\_\_\_\_

PAGE 11 *Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1600 ARRIVED AT SITE 7 LANDFILL

↳ LAND OUT LOCATIONS

1625 STARTED SAMPLING PROCEDURE AT  
7LF-WS01

1630 \*SAMPLE! 13-7LF-WS01-0

PRIMARY  
CF/JO/KM  
↳ COLLECTED w/ DEDICATED DIPPER,  
FILTERED METALS COLLECTED w/  
PERISTALTIC PUMP

↳ 4 40ml VOAs (HCl) AK101/SW8260 (BTEX)

FILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

UNFILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

↳ 2 1L AMBER (HCl) AK102/AK103

↳ 3 1L AMBER (none) SW8270 SIM/SW8082

- SURFACE WATER

1650 FINISHED SAMPLING AT 7LF-WS01

1640 STARTED SAMPLING PROCEDURE AT  
7LF-WS02

Scale: 1 square = \_\_\_\_\_

PAGE 12

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1644 \*SAMPLE! 13-7LF-WS02-0

PRIMARY  
JO/CF/KM  
↳ COLLECTED w/ DEDICATED DIPPER,  
FILTERED METALS COLLECTED WITH  
PERISTALTIC PUMP

↳ 4 40ml VOAs (HCl) AK101/SW8260 (BTEX)

FILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

UNFILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

↳ 2 1L AMBER (HCl) AK102/AK103

↳ 3 1L AMBER (none) SW8270 SIM/SW8082

→ SURFACE WATER

1653 STARTED SAMPLING PROCEDURE AT  
7LF-WS03-0

PRIME  
CF/JO/KM

1654 \*SAMPLE! 13-7LF-WS03-0

PRIMARY  
JO/CF/KM  
↳ COLLECTED w/ DEDICATED DIPPER, FILTERED METALS  
WITH PERISTALTIC PUMP

↳ 4 40ml VOAs (HCl) AK101/SW8260 (BTEX)

FILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

UNFILTERED ↳ 1 250ml POLY (HNO<sub>3</sub>) SW6020 RCRA METALS SW7471 MERCURY

↳ 2 1L AMBER (HCl) AK102/AK103

↳ 3 1L AMBER (none) SW8270 SIM/SW8082

→ SURFACE WATER

Scale: 1 square = \_\_\_\_\_

PAGE 13

Rite in the Rain



NE CAPE  
5 YEAR REVIEW

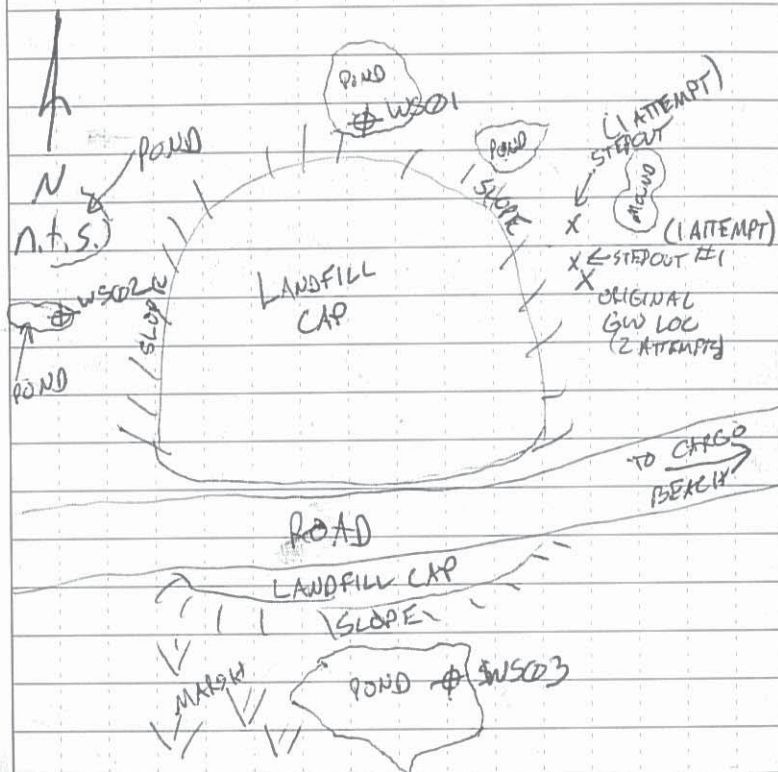
USACE  
9/12/13

1720 FINISHED SAMPLING AT 7LF-WS02

1738 FINISHED SAMPLING AT 7LF-WS03

~~LEFT SITE FOR THE DAY~~ (P) 9/12

1736 7LF GW SAMPLING LOCATION



Scale: 1 square = \_\_\_\_\_

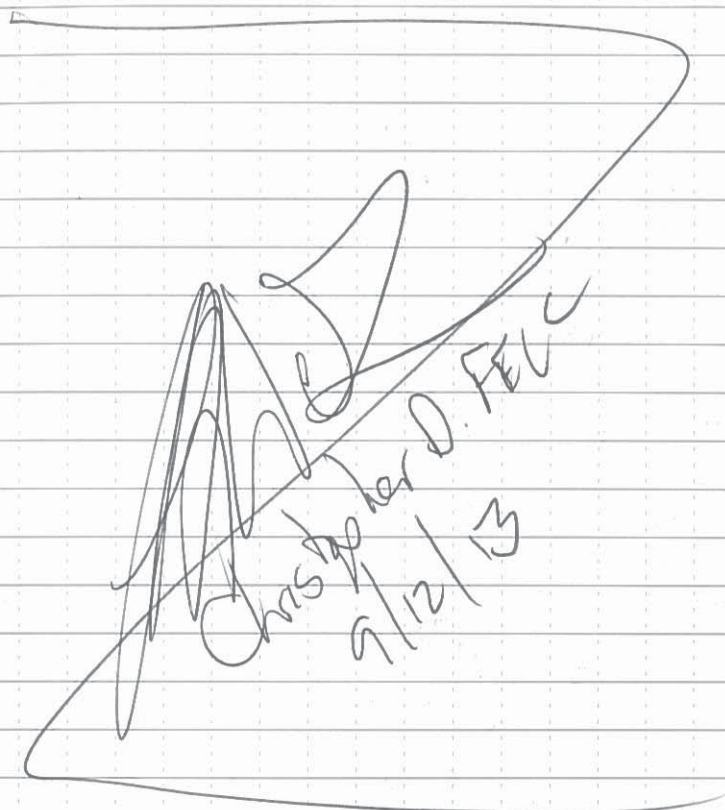
PAGE 14

NE CAPE  
5 YEAR REVIEW

USACE  
9/12/13

1749 LEFT SITE FOR THE DAY

↳ TRANSFERRED SAMPLES BACK TO CAMP  
↳ SAMPLING WASTE/IDW TRANSFERRED  
BACK TO CAMP IN 5 GALLON  
BUCKETS (PAGE 62)



Scale: 1 square = \_\_\_\_\_

PAGE 15

Rite in the Rain

NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

0700 JACOBS TAILGATE

PERSONNEL

|        |              |           |
|--------|--------------|-----------|
| JACOBS | K. MAHER     | SHELEAD   |
| JACOBS | C. FELL      | SSHO/TECH |
| JACOBS | J. ORCZEWSKA | TECH      |

→ K. MAHER DEPARTED AT APPROX 1140

WX: WINDY 10-20mph gusts  
30°F TO 40°F  
OVERCAST

0720 DAILY OBJECTIVES

- COOLER PACKING
- RENTAL DEMONSTRATION
- 5YR REVIEW TRAINING
- BEGIN 5YR REVIEWS

0800 BRISTOL TAILGATE

Scale: 1 square = \_\_\_\_\_

PAGE 16

NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

0830 PREPARED CHAINS OF CUSTODY  
TO FOR 8 COOLERS WITH  
1140 SAMPLES COLLECTED ON  
9/12/13

COOLERS

- KILO
- JULIETT
- CHARLIE
- MIKE
- ALFA
- HOTEL
- ECHO
- ROMEO

1140 5 YEAR REVIEW CHECKLIST  
TRAINING

1200 LUNCH

1230 BACK FROM LUNCH - GOING TO  
START SITE WALKS

→ K. MAHER WAITING IN CAMP FOR  
AIRPLANE TO HOME

Scale: 1 square = \_\_\_\_\_ PAGE 17

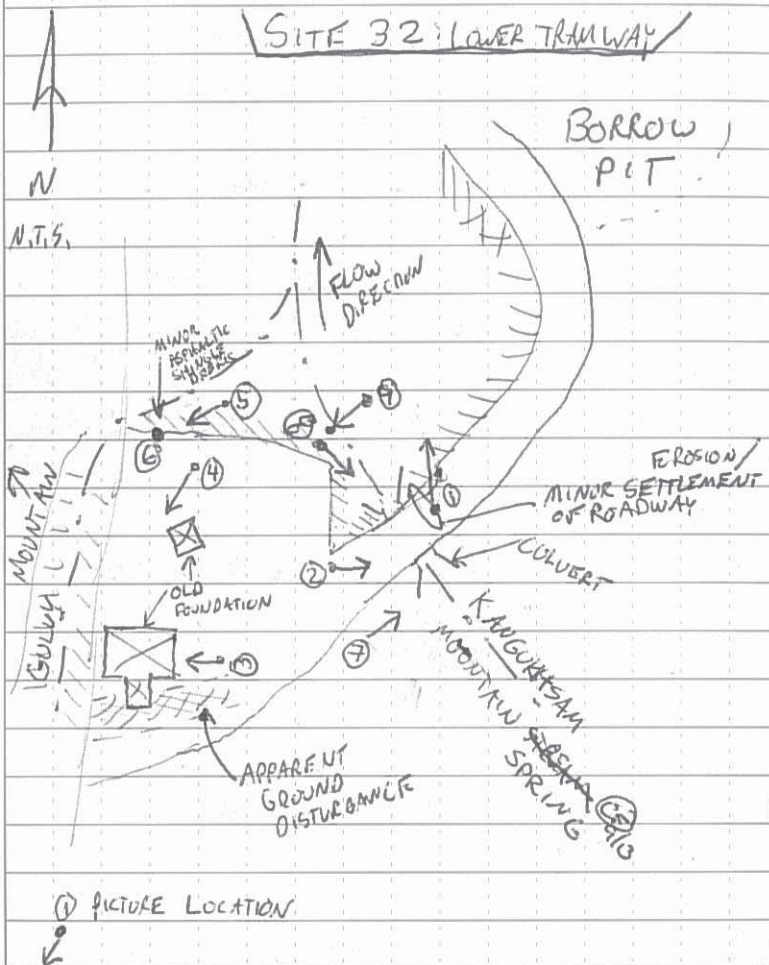
*Rite in the Rain*



NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

1240 SITE WALK OF SITE 32 - LOWER TRAMWAY  
SEE CHECKLIST FOR FURTHER  
INFORMATION



Scale: 1 square = \_\_\_\_\_

PAGE 18

NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

1313 OBSERVED MINOR WOOD AND METAL DEBRIS  
ON SITE

1321 OBSERVED MINOR ASPHALTIC SHINGLE DEBRIS  
1x2 FT TO 2x2 FT (APPROX) DIMENSIONS ON THE  
GROUND WEST OF THE OLD FOUNDATION

1325 OBSERVED APPARENT GROUND DISTURBANCE (RECENT)  
TO THE EAST OF THE OLD FOUNDATION,  
THIN VEGETATION IS GROWING ON THE  
EXTREMELY ROCKY SOIL

1327 NO GROUNDWATER MONITORING WELLS WERE  
OBSERVED

1330 CULVERT UNDER ROAD AT THE SITE IS APPROX  
5 TO 6 FT IN DIAMETER

1332 ONGOING REMEDIAL ACTIVITY IS MINING  
BORROW FOR BACK FILL ADJACENT TO THE  
SITE ON THE OPPOSITE SIDE OF  
KANUKHSAM MOUNTAIN SPRING

1343 LEFT SITE 32: LOWER TRAMWAY

Scale: 1 square = \_\_\_\_\_

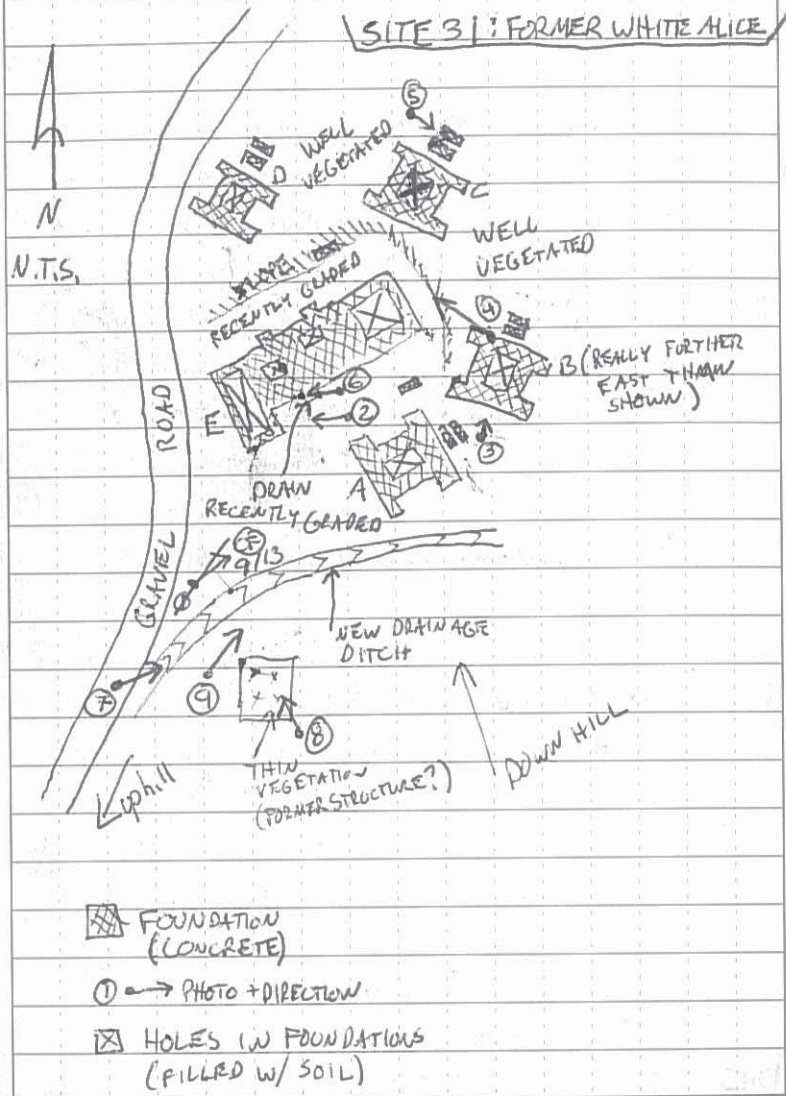
PAGE 19

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

1347 ARRIVED AT SITE 31: FORMER WHITE ALICE



PAGE 20

NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

1404 OBSERVED MINOR WOOD/METAL/WIRING DEBRIS NEAR ANTENNA FOUNDATION "C"

1405 OBSERVED A DRAIN COVER (RUSTED) ON THE SOUTH-SIDE OF FOUNDATION "E" WITH AN UNFILLED VOID UNDERNEATH (APPROX 6 FT DEEP, 5 WIDE, 9 FT LENGTH). DRAIN IS APPROX 4 FT LONG & 6 INCHES WIDE.

1415 AREA AROUND FOUNDATION "E" AND ANTENNA FOUNDATION "A" HAVE BEEN RECENTLY GRADED, COMPACTED, AND SEEDED. NEW VEGETATION IS JUST SPROUTING. AREA APPEARS TO BE GRADED TO PROMOTE POSITIVE DRAINAGE AND MITIGATE EROSION

1416 HOLES IN FOUNDATIONS HAVE BEEN FILLED WITH SOIL  
↳ NO STAINING OF CONCRETE OBSERVED

1420 AREA OF STUNTED VEGETATION ~~AT~~ <sup>9/13</sup> UPHILL FROM THE WACS SITE (APPROX 20 FT BY 30 FT RECTANGLE)

1424 NO GROUNDWATER MONITORING WELLS OBSERVED

1440 LEFT SITE 31: WHITE ALICE  
↳ CHECKLIST ON SEPARATE FORM

Scale: 1 square = \_\_\_\_\_ PAGE 21

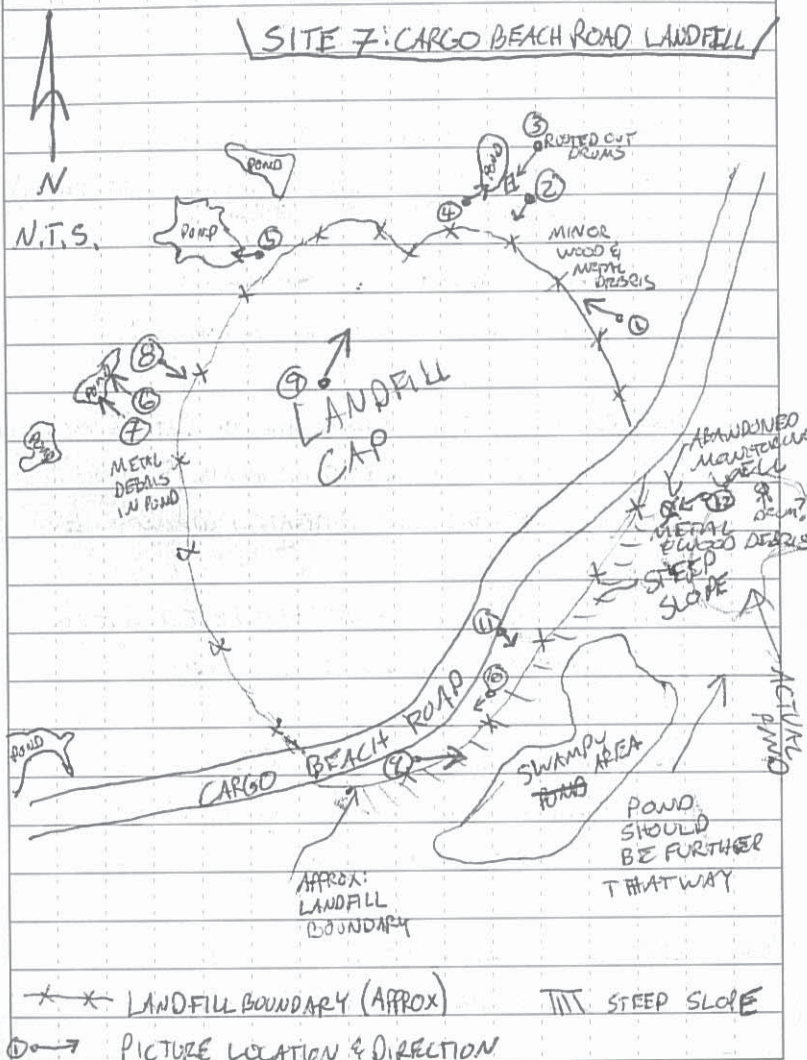
*Rite in the Rain*



NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

1509 ARRIVED AT SITE 7: CARGO BEACH ROAD LANDFILL



Scale: 1 square =

PAGE 22

NE CAPE  
5 YR REVIEW

USACE  
9/13/13

1517 THE LANDFILL COVER APPEARS TO CONSIST OF FINE AND COARSE GRAVEL AT THE SURFACE WITH PATCHY GRASS COVER

1523 CARGO BEACH ROAD CROSSES THE LANDFILL CAP. NO SETTLEMENT OBSERVED GRADING/DRAINAGE APPEARS ADEQUATE

1528 WOOD DEBRIS AT PICTURE ① LOCATION (MINOR) WITH OTHER WOOD AND METAL DEBRIS NEARBY

1546 OBSERVED 2 RUSTED OUT DRUMS NEAR THE EDGE OF THE POND NEAR THE NE CORNER OF THE LANDFILL (SSgal?)

1547 OBSERVED METAL/WOOD/PLASTIC DEBRIS IN THE NORTHEAST POND

1552 OBSERVED METAL DEBRIS IN THE POND AT THE NW CORNER OF THE LANDFILL WHERE PICTURE ⑤ WAS TAKEN

1553 LANDFILL CAP DOES NOT HAVE OBSERVED SIGNS OF SETTLEMENT/EROSION OR LANDFILL DEBRIS STICKING THROUGH THE CAP

1559 OBSERVED METAL DEBRIS IN THE POND TO THE WEST OF THE LANDFILL (METAL ROOFING?) → PICTURES 6 & 7

Scale: 1 square =

PAGE 23

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

1607 RUBBER HOSE STICKING THROUGH LANDFILL CAP  
ALONG WITH SOME METAL DEBRIS NEAR  
PICTURES 10 & 11

1615 OBSERVED AN ABANDONED MONITORING WELL NEAR  
THE SE CORNER OF THE LANDFILL - ABANDONED  
WITH HYDRATED BENTONITE

1616 OBSERVED <sup>CP 9/13</sup> ~~MAJOR~~ METAL DEBRIS AND OTHER DEBRIS  
IN THE POND NEAR THE SE CORNER OF THE LANDFILL  
↳ OBSERVED A SUBMERGED OBJECT W/ A ROUND  
OPENING (DRUM?)

### 1633 \* ITEMS OF INTEREST \*

- DEBRIS PROTRUDING THROUGH CAP ON S SIDE (MINOR)
- SIGNIFICANT METAL & WOOD DEBRIS IN THE  
SURROUNDING PONDS (INCLUDING A FEW RUSTED  
OUT DRUMS)

1637 LEFT SITE 7 LANDFILL  
↳ 5 YR REVIEW CHECKLIST ON SEPARATE FORM

1640 ARRIVED AT SITE 9: HOUSING &  
OPERATIONS LANDFILL  
↳ 5 YR REVIEW CHECKLIST INCLUDED ON  
A SEPARATE FORM

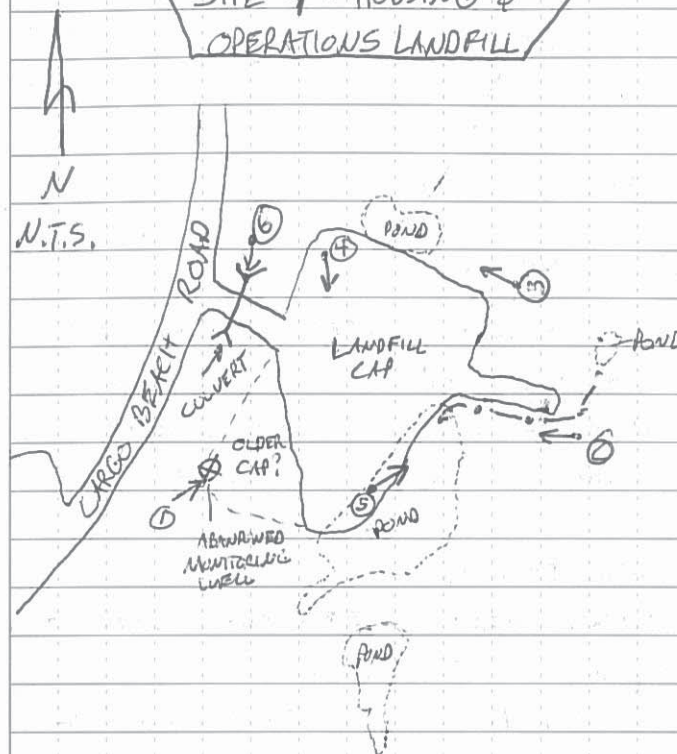
Scale: 1 square =

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NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

### SITE 9: HOUSING & OPERATIONS LANDFILL



① → PICTURE LOCATION & DIRECTION

○ POND BOUNDARY

- - - DIVERSION DITCH

→ CULVERT

1642 DRAINAGE IN EXCELLENT CONDITION -  
NO VEGETATION IN DITCH

Scale: 1 square =

PAGE 25

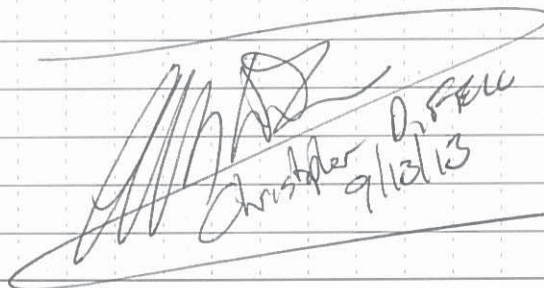
*Rate in the Rain*



NE CAPE  
5 YEAR REVIEW

USACE  
9/13/13

- 1649 LANDFILL CAP APPEARS TO BE IN GOOD  
CONDITION WITH THIN GRASSY VEGETATION.  
CAP IS COMPOSED OF COARSE MATERIAL  
(GRAVEL) THAT MAKES VEGETATION GROWTH  
DIFFICULT.
- 1651 EROSION & SETTLEMENT WERE NOT  
OBSERVED. GRADING APPEARS TO ALLOW DRAINAGE
- 1657 OBSERVED AN ABANDONED MONITORING WELL AT  
THE SW CORNER OF THE OLD LANDFILL CAP.  
↳ COULD NOT FIND THE OTHER 2 MONITORING  
WELLS SHOWN IN THE DECISION DOCUMENT
- 1734 LEFT SITE 9: HOUSING & OPERATIONS LANDFILL
- END OF DAY

  
Christopher D. Fell  
9/13/13

Scale: 1 square = \_\_\_\_\_

PAGE 26

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

- 0800 BRISTOL TAILGATE
- 0830 JACOBS TAILGATE

PERSONNEL

|        |              |           |
|--------|--------------|-----------|
| JACOBS | C. FELL      | SITE LEAD |
| JACOBS | J. ORCZEWSKA | SSHG/TECH |

WX: CALM  
30s TO 40s F  
OVERCAST

- 0850 DAILY OBJECTIVES
- 5 YEAR REVIEW SITE WALKS
  - PAPERWORK CRC
  - CONTINUE PREP FOR DEMOBE

0850 SITE HISTORY REVIEW  
to

Scale: 1 square = \_\_\_\_\_

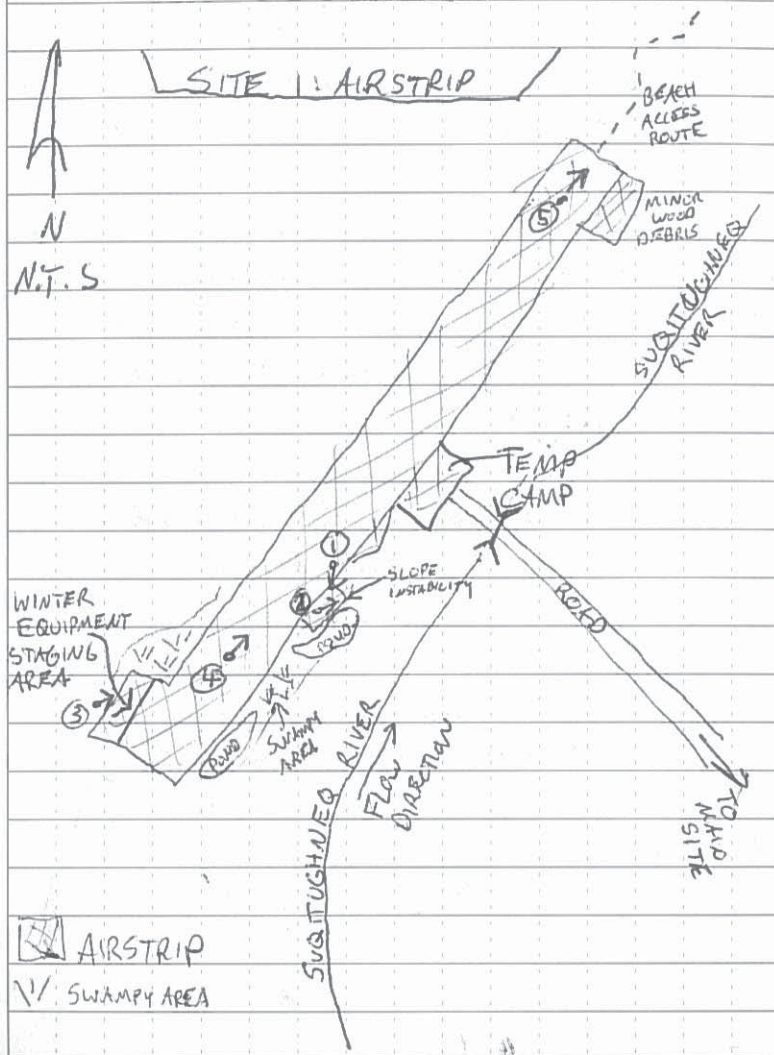
PAGE 27

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

0944 LEFT CAMP TO CONDUCT SITE WALK  
FOR SITE 1 AIRSTRIP.



Scale: 1 square = \_\_\_\_\_

PAGE 28

# NE CAPE 5 YEAR REVIEW

USACE  
9/14/13

0955 OBSERVED 1 TO 6 INCH TENSION CRACKS IN THE  
SLOPE OF A SIDING OFF THE SIDE OF THE  
RUNWAY. THE NORTHEAST CORNER OF  
THE PAD HAS APPROXIMATELY 1 FT OF  
SETTLEMENT AT THE TOP OF THE  
SLOPE.

→ SLOPE INSTABILITY IS APPROX 30-40 FT FROM THE EDGE OF THE RUNWAY AND WILL NOT AFFECT OPERATIONS ON THE RUNWAY

10000 RUNWAY SURFACE WAS OBSERVED TO BE IN  
GOOD CONDITION AND WAS FREE OF  
RUTTING, SETTLEMENT, OR EROSION DAMAGE

→ SLOPES IMMEDIATELY ADJOINING THE RUNWAY SURFACE WERE <sup>GENERALLY</sup> FREE OF SIGNS OF SLOPE INSTABILITY, HOWEVER ARE SLOPED BETWEEN  $1\frac{1}{2}$  TO 1 AND  $3\frac{1}{4}$  TO 1 WHICH MAY LEAD TO EROSION DAMAGE OVER TIME

↳ SMALL TENSION CRACKS ON  $3/4$  TO 1 SECTIONS

Scale: 1 square = 1000000 PAGE 29

PAGE 29

Rite in the Rain



NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

1014 A FEW SHIPPING RACKS ARE STAGED ON THE END OF THE RUNWAY AT THE WINTER STORAGE AREA  
↳ NO SOIL STAINING OBSERVED AT STORAGE AREA

1033 MINOR WOOD DEBRIS NOTED ALONG THE EAST SIDE OF THE RUNWAY NEAR THE NORTH END

1038 A TRAIL HAS BEEN FORMED OFF THE NORTH END OF THE RUNWAY LEADING TO THE BEACH.

1044 LEFT SITE 1 AIRSTRIP

↳ 5 YEAR REVIEW CHECKLIST ON A SEPARATE FORM 9/14

\*ITEMS OF INTEREST\*

- MINOR SLOPE STABILITIES ISSUES ON THE RUNWAY EDGES.

*[Signature]*  
D. Fell  
9/14/13

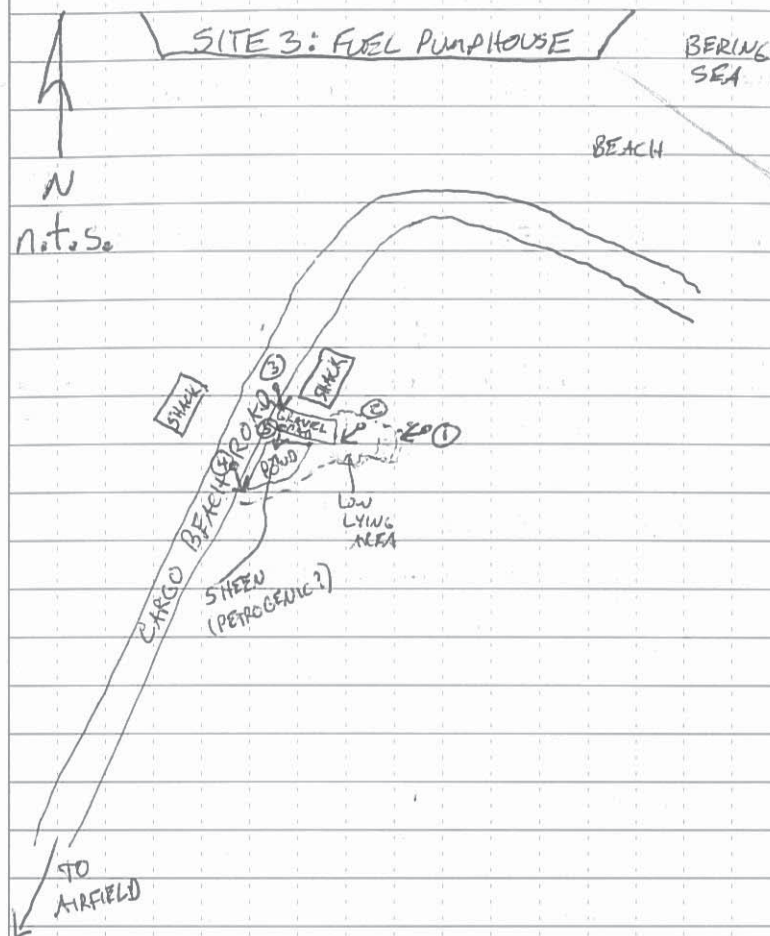
Scale: 1 square =

PAGE 30

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

1055 ARRIVED AT SITE 3: FUEL PUMPHOUSE



Scale: 1 square =

PAGE 31

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

- 1112 OBSERVED A SALVAGED PIECE OF RUSTED OUT EQUIPMENT STAGED FOR REMOVAL
- 1113 EXCAVATION AREA NOTED IN THE ROD APPEARS TO NOW BE A ROAD
- 1114 BIOGENIC SHEEN (BRITTLE) NOTED ON SOME WATER IN FROM THE ROAD
- 1116 FORMER PIPELINE WAS NOT OBSERVED (REMOVED?) FORMER PUMPHOUSE STRUCTURE HAS BEEN REMOVED.
- 1119 SHEEN NOTED ON PONDED WATER NEAR THE GRAVEL PAD. SHEEN WAS NOT BRITTLE AND FLOWED BACK TOGETHER AFTER BEING DISTURBED (LIGHT SHEEN)
- 1126 VEGETATION IS GROWING WELL ON SITE EXCEPT ON A NEW GRAVEL PAD
- 1132 LEFT SITE 3: FUEL PUMPHOUSE
- 1133 ARRIVED AT SITE 6: GRAVEL PAD  
↳ 5 YEAR REVIEW CHECKLIST ON A SEPARATE FORM

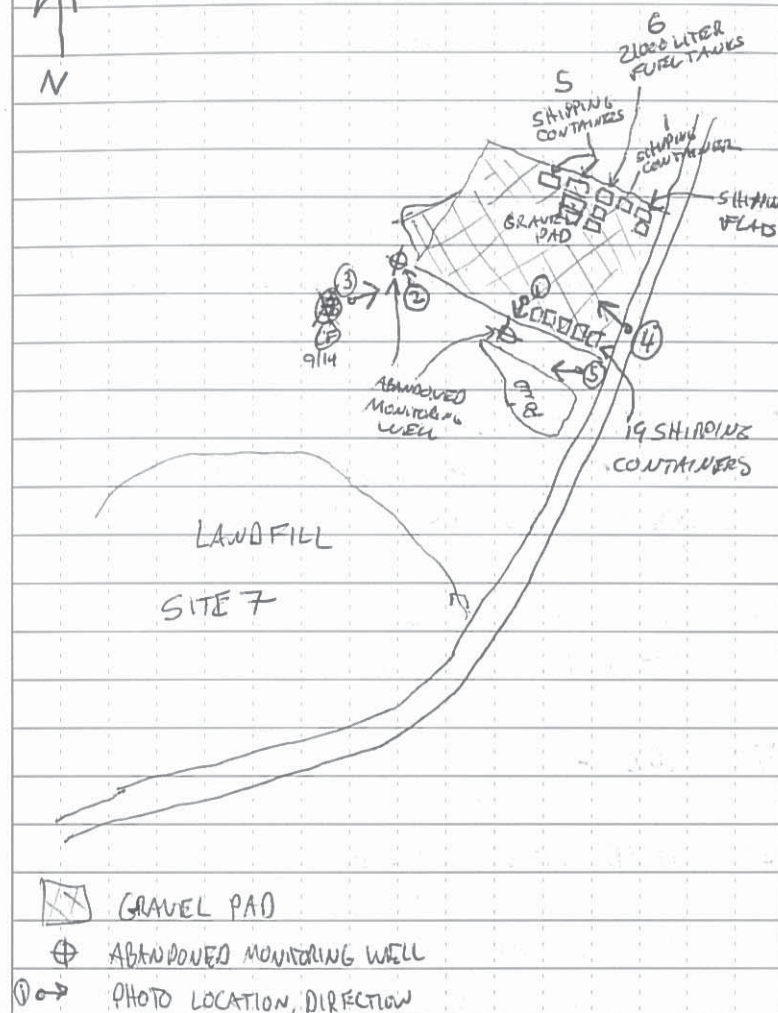
Scale: 1 square =

PAGE 32

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

SITE 6: GRAVEL PAD



Scale: 1 square =

PAGE 33

Rite in the Rain



NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

1140 OBSERVED AN ABANDONED MONITORING WELL ON THE SW SIDE OF THE SITE. (HYDRATED BENTONITE)

1143 A SECOND ABANDONED MONITORING WELL OBSERVED ON THE WEST CORNER OF THE PAD (HYDRATED BENTONITE)

1148 DID NOT OBSERVE STAINING ON THE NEWLY GRADED GRAVEL PAD THAT IS CURRENTLY BEING USED TO STORE SHIPPING CONTAINERS.

↳ PAD APPEARS TO HAVE BEEN RECENTLY SAMPLED

↳ GRID SAMPLING

↳ PAD GRADED TO PROMOTE DRAINAGE AND MITIGATE EROSION

1153 DID NOT OBSERVE DEBRIS OR ASHEEN IN THE POND TO THE SOUTH OF THE SITE

1155 LEFT SITE 6: GRAVEL PAD

1206 LUNCH

1230 DINE WITH LUNCH

1230 VIEWED HISTORICAL PHOTOS WITH

1340 JEREMY CRANER (USACE)

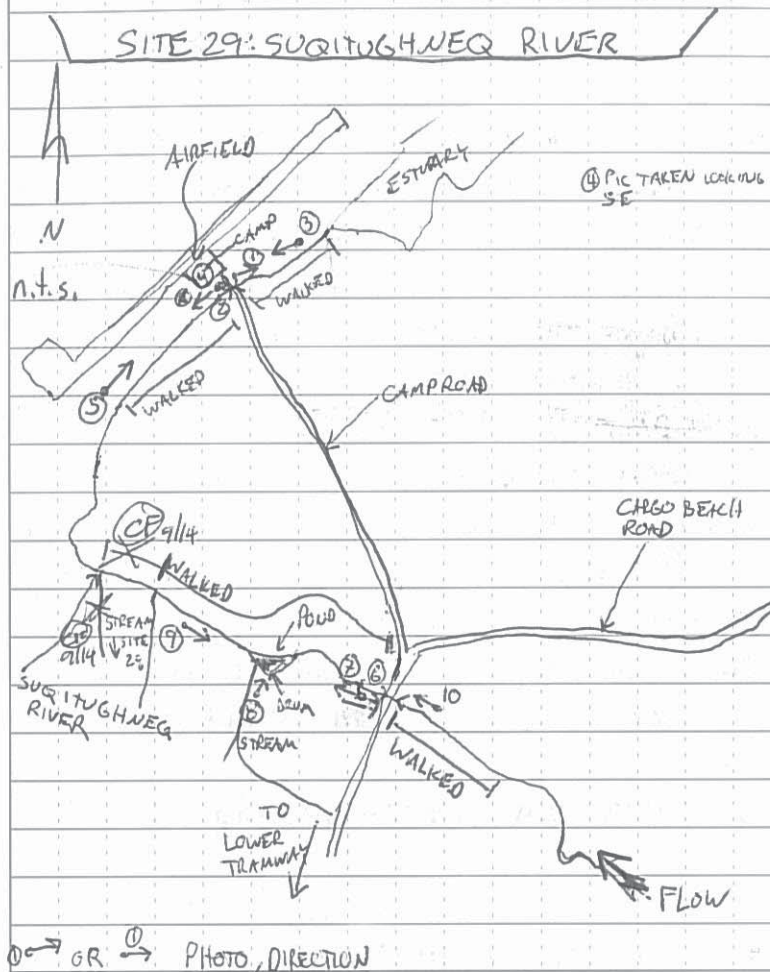
Scale: 1 square =

PAGE 34

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

1341 SITE WALK FOR SITE 29: SUQITUGHNEQ RIVER  
↳ 5 YEAR REVIEW CHECKLIST ON A SEPERATE FORM.



Scale: 1 square =

PAGE 35

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

- 1352 WALKED THE SUQUITUGHNEQ RIVER FROM CAMP ROAD TO THE ESTUARY
- 1357 DID NOT OBSERVE ANY DEBRIS OR SHEEN <sup>(PETROGENIC)</sup>. LOOKS LIKE A RIVER
- 1402 CONSTRUCTION CAMP IS PUMPING WATER FROM THE SUQUITUGHNEQ RIVER FOR GENERAL USE (SOUTH OF ROAD)
- 1411 WALKED THE SUQUITUGHNEQ RIVER FROM CAMP ROAD TO THE END OF THE RUNWAY
- 1412 ~~DID NOT~~ <sup>OBSERVE</sup> ~~ANY~~ <sup>CERTAIN</sup> DEBRIS OR SHEEN (PETROGENIC).
- TRAVELLED UP RIVER
- 1426 WALKED THE SUQUITUGHNEQ RIVER FROM CARGO BEACH ROAD TOWARDS THE AIRFIELD
- 1433 OBSERVED A DRUM IN A POND → VERY RUSTED, NO SHEEN OBSERVED
- 1445 DID NOT SEE DEBRIS/SHEEN (PETROGENIC) TO SOUTH OF SITE 28 DRAINAGE

Scale: 1 square = \_\_\_\_\_

PAGE 36

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

- 1450 WALKED THE SUQUITUGHNEQ RIVER FROM CARGO BEACH ROAD UPSTREAM
- ↳ WATER HOSE (4 inch) IN THE WATER AT THE CULVERT FOR CARGO BEACH ROAD. MAY BE IN USE AS A WATER SOURCE FOR CONSTRUCTION/REMEDIATION ACTIVITIES.
- 1500 DID NOT SEE DEBRIS/SHEEN (PETROGENIC) ALONG THE SUQUITUGHNEQ RIVER
- 1512 LEFT SITE 29: SUQUITUGHNEQ RIVER
- 1515 SITE WALK FOR SITE 8: POL SPILL
- ↳ 5 YEAR CHECKLIST ON A SEPARATE FORM
- 1522 VEGETATION IS THICK AND HEALTHY
- NO ODOR OBSERVED
- NO SHEEN (PETROGENIC) OBSERVED
- NO DEBRIS OBSERVED
- 1533 LEFT SITE 8: POL SPILL

Scale: 1 square = \_\_\_\_\_ PAGE 37

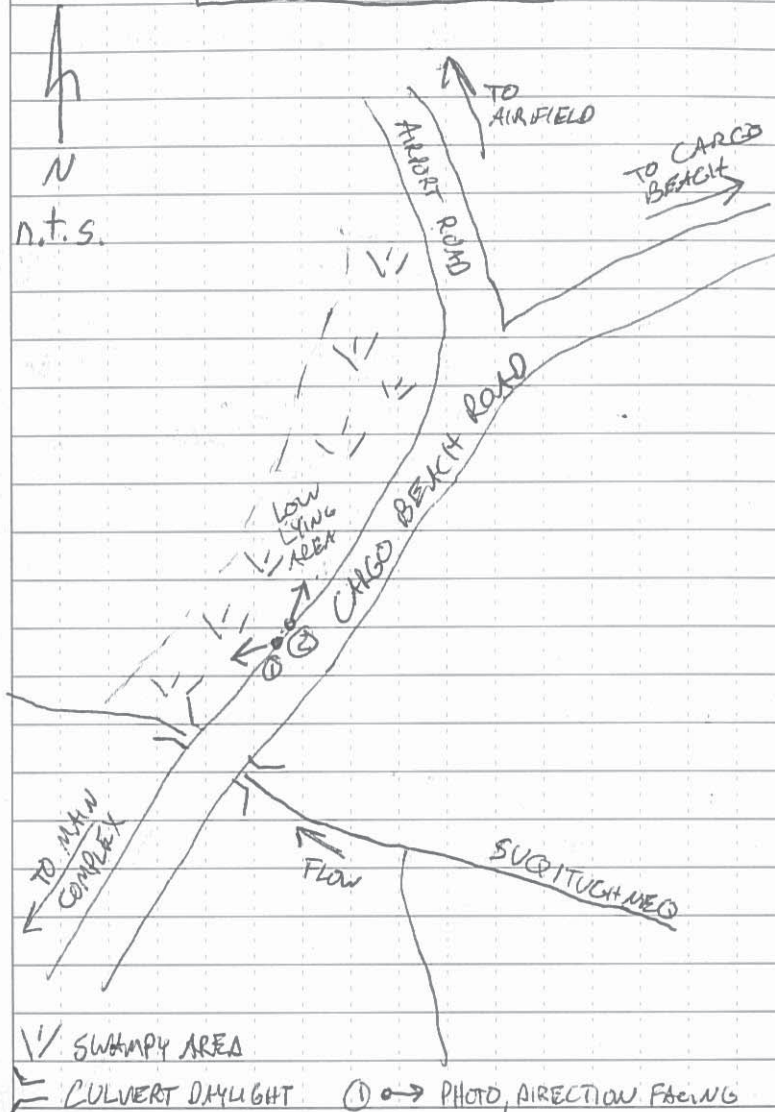
Rite in the Rain



NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

SITE 8: POL SPILL



Scale: 1 square =

PAGE 38

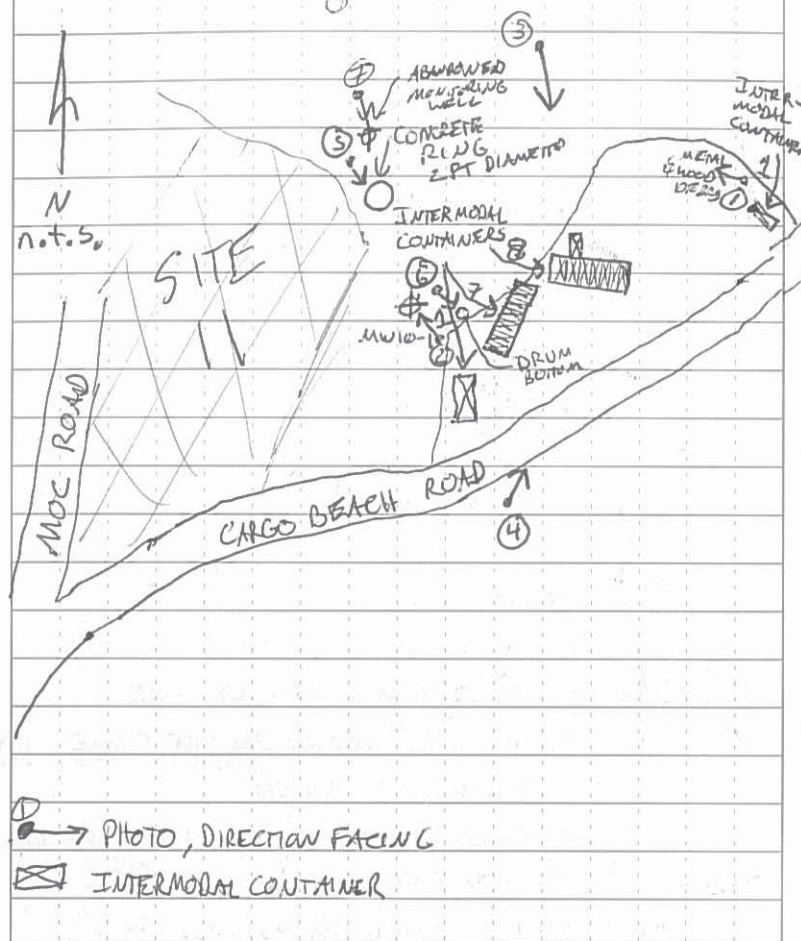
NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

1534 ARRIVED AT SITE 10: BURIED DRUMS

5 YEAR REVIEW CHECKLIST ON A SEPARATE FORM

SITE 10: BURIED DRUMS



Scale: 1 square =

PAGE 39

Rite in the Rain

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13

1547 OBSERVED WOOD AND METAL DEBRIS (MINOR) AT THE NE CORNER OF THE SITE

1550 OBSERVED MONITORING WELL (0-1) WELL CASING HAS JACKED 1 FOOT ABOVE THE PROTECTIVE STEEL CASING, NO LOCKING CAP OR PROTECTIVE BOLLARDS.

1554 ~~ENHANCED~~ 9/14 OBSERVED EVIDENCE OF RECENT SOIL BORINGS & SAMPLING ACTIVITY

1558 SITE IS CURRENTLY BEING USED AS A LAYDOWN AREA BY THE REMEDIAL CONTRACTOR (BRISTOL). SITE IS GRADED AND COMPACTED TO PROMOTE POSITIVE DRAINAGE AND MITIGATE EROSION

↳ NO VEGETATION PRESENT ON THE GRAVEL PAD. VEGETATION AROUND THE PAD APPEARS HEALTHY

1604 OBSERVED A DRUM BOTTOM AT BASE OF SLOPE

1608 2ND MONITORING WELL SHOWN ON THE FIGURE IN THE ROD WAS NOT FOUND.

↳ JEREMY CRAWLER INDICATES IT WAS DECOMMISSIONED (USACE) ↳ OBSERVED THE ABANDONED WELL

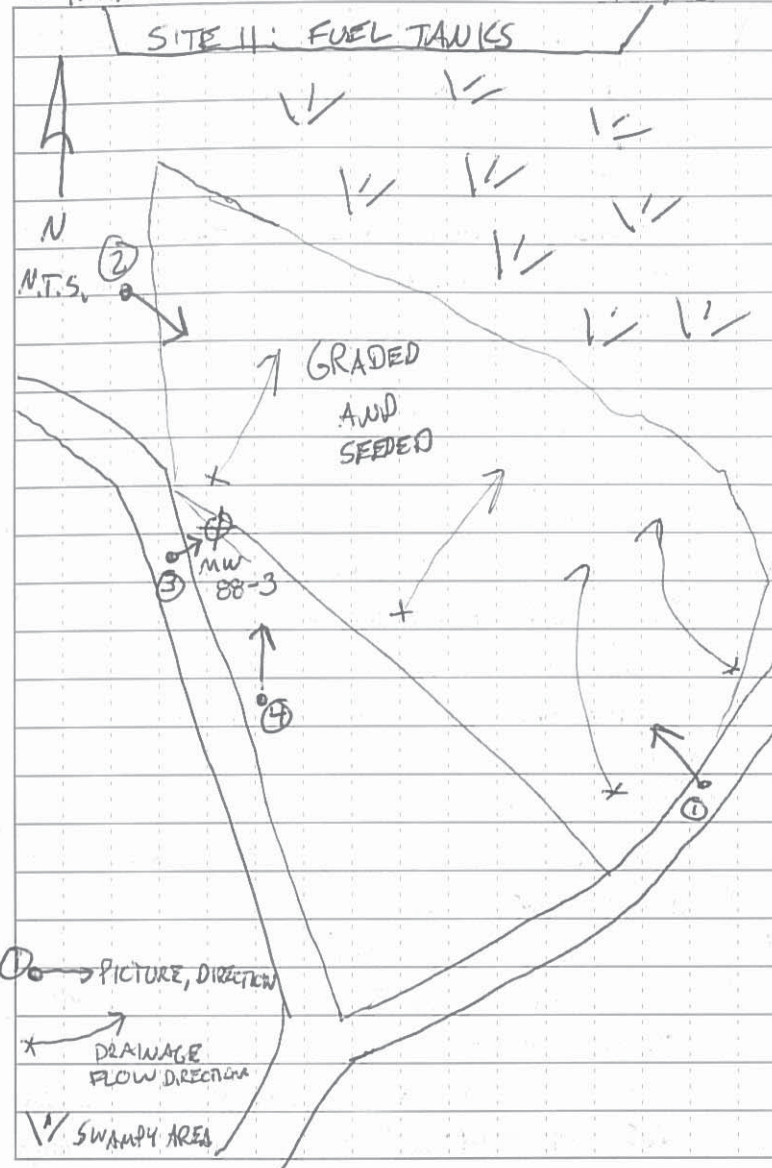
1624 LEFT SITE 10: BURIED DRUMS

Scale: 1 square = \_\_\_\_\_

PAGE 40

NE CAPE  
5 YEAR REVIEW

USACE  
9/14/13



Scale: 1 square = \_\_\_\_\_ PAGE 41

*Rite in the Rain*



NE CAPE

5 YEAR REVIEW

USACE

9/14/13

1625 ARRIVED AT SITE ~~1630~~ 9/14 11: FUEL TANKS

FOR A SITE WALK

↳ 5 YEAR REVIEW CHECKLIST ON A SEPERATE FORM

1635 OBSERVED MONITORING WELL MW88-3,

↳ CASING HAS A LOCKING CAP - WITH NO LOCK

↳ FLUSH MOUNT MONUMENT DOES NOT CLOSE

AS THE WELL APPEARS TO HAVE FROST

JACKED

1643 SITE HAS BEEN GRADED/COMPACTED/AND

SEEDED TO PROMOTE POSITIVE DRAINAGE

AND MITIGATE EROSION.

↳ OBSERVED THE REMEDIAL CONTRACTOR (BRISTOL)  
SPREADING SEED ON THE AREA

1645 LOCATIONS OF THE FORMER ASTS ARE

NOT APPARANT

1650 DEBRIS NOT OBSERVED ON SITE OR AROUND  
THE PERIMETER

1715 LEFT THE SITE  Christopher D. Fell 9/14/13

Scale: 1 square =

PAGE 42

NE CAPE

5 YEAR REVIEW

USACE

9/15/13

0730 PAPERWORK & SITREP

0745 BREAKFAST

0800 BRISTOL TAILGATE

0830 JACOBS TAILGATE

### PERSONNEL

JACOBS J. ORCZEWSKA SSHO/TECH

JACOBS C. FELL SITE LEAD

### WX:

OVERCAST

LIGHT BREEZE

LOW 40s F

PAZ: LEVEL D MODIFIED

### DAILY OBJECTIVES

- SITEWALK REMAINING 7 SITES

- PREP FOR DEMOBE

Scale: 1 square =

PAGE 43

*Rite in the Rain*

NE CAPE

## 5 YEAR REVIEW

USAEVE

9/15/13

0931 ARRIVED AT SITE 28: DRAINAGE BASIN

↳ 5 YEAR REVIEW CHECKLIST ON A SEPERATE FORM

0950 OBSERVED 5 30 FT BY 60 FT SETTLING PANS FOR  
COLLECTING WATER & SEDIMENT FROM DREDGE OPERATIONS

15) 11 SEDIMENT COLLECTION BAGS (25FT X 6FT X 1 1/2 FT)  
PRESENT IN THE PONDS

↳ GAC SYSTEM BY PRO ACT BEING USED TO TREAT WATER PRIOR TO ONSITE DISPOSAL (OUT TO RUN DRA)

Q156 INTERMEDIATE POUNDS ARE BEING USED TO LIFT WATER <sup>1</sup> SER IN BUT  
UPHILL WITH PUMP STATIONS

10009 A SEDIMENT TRAP (STEEL WALL, 6FT WITH 3FT LINES)

1014 A SMALL DREDGE WAS BEING USED TO REMOVE SEDIMENT  
(ON PONTOONS)

1017 A JUTT MAT SEDIMENT TRAP WAS AT THE MOUTH  
OF THE DRAINAGE, DID NOT OBSERVE SEDIMENT  
ESCAPING INTO THE SUQUITAHNE RIVER

10/8 DID NOT OBSERVE DEBRIS IN THE DRAINAGE

Scale: 1 square =

PAGE 44

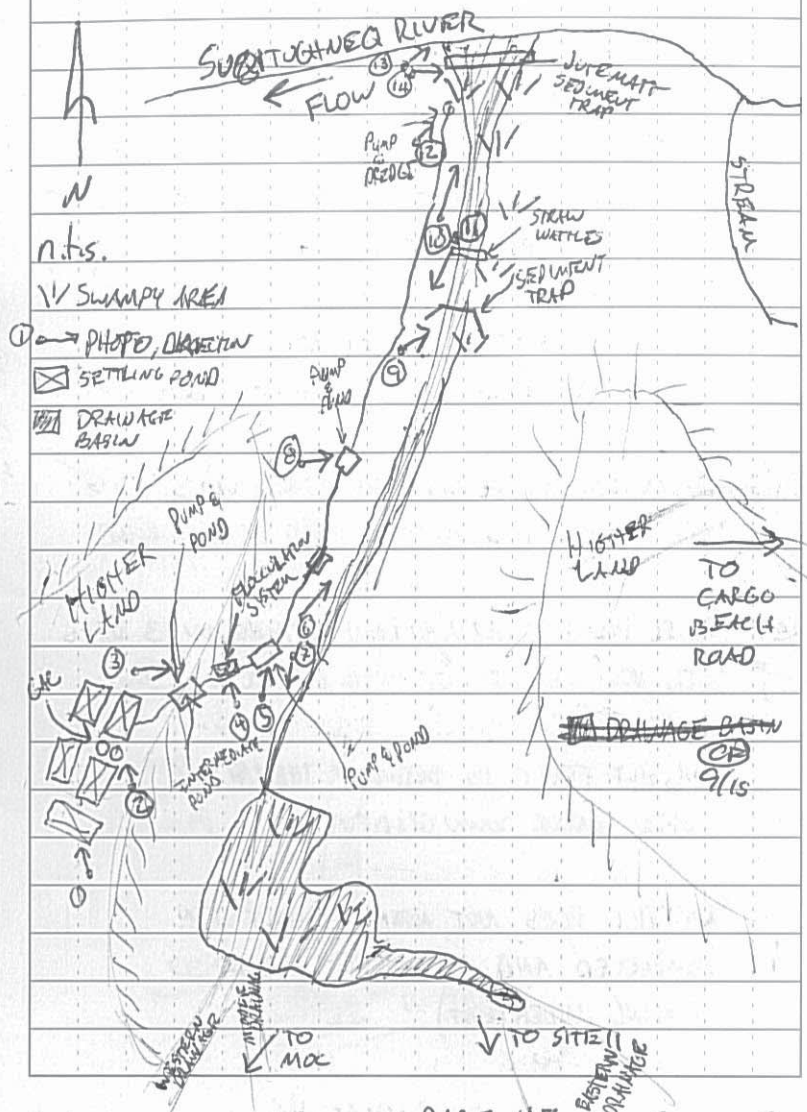
NFL CAPT

## 5 YEAR REVIEW

USA-E-E

9/15/13

## SITE 20: DRAINAGE BASIN



Scale: 1 square =

PAGE 45

Rite in the Rain

Estadística



NE CAPE  
5 YEAR REVIEW

USACE  
9/15/13

1027 LEFT SITE 28: DRAINAGE BASIN

1030 MET W/ ECO LAND SURVEYING ABOUT SURVEY  
OF SAMPLING LOCATIONS FROM 9/12/13

↳ NEED TO REMARK SITE 32

↳ WILL VISIT SITE 7 & SITE 9 WITH THE  
SURVEYOR BEFORE LUNCH

1050 ARRIVED AT SITE 21: WASTEWATER TANK

↳ 5 YEAR REVIEW FORM ON A SEPARATE FORM

1105 OBSERVED BRISTOL (REMEDIAL CONTRACTOR) SETTING  
THE GRAVEL PAD AT THE END OF THE ROAD

1109 GRAVEL PAD HAD BEEN AN OPEN EXCAVATION 3 DAYS  
AGO. NOW IS BACKFILLED WITH GRAVEL WITH ~~WITH~~ <sup>9/15</sup>  
LITTLE SILT.

↳ A SILT FENCE IS BETWEEN THE PAD AND  
OPEN WATER DOWN GRADIENT

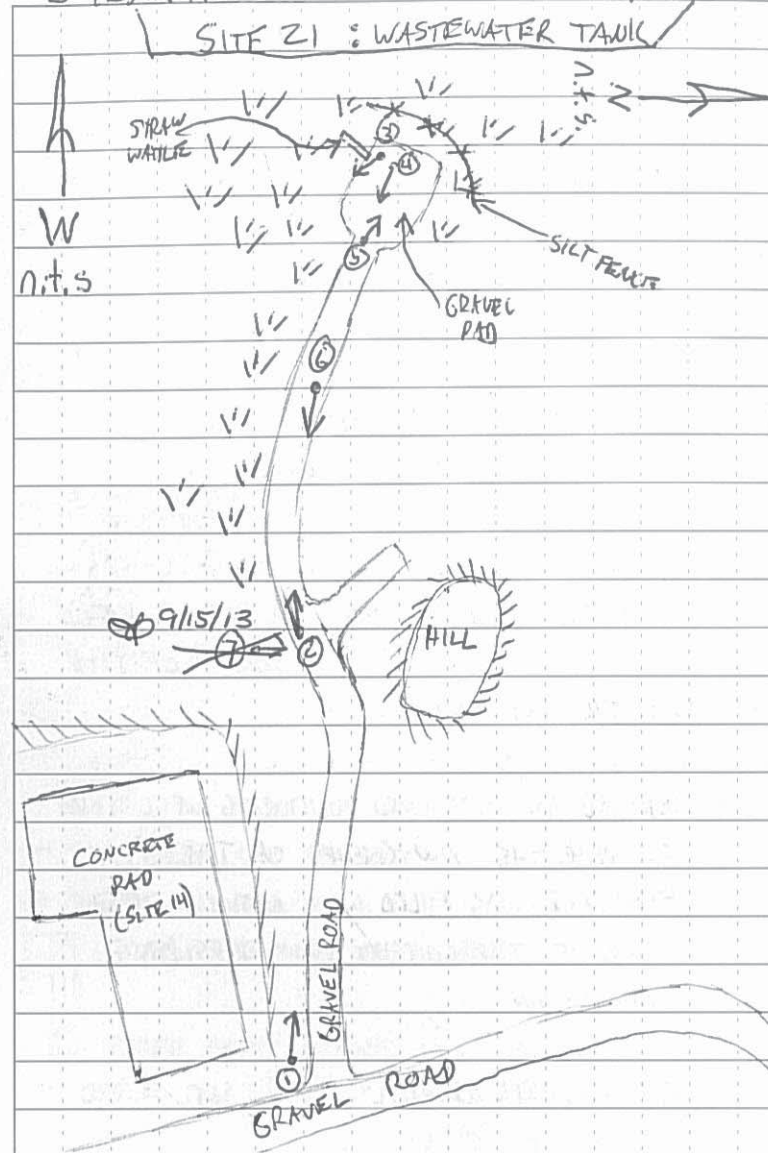
BACKFILL DOES NOT APPEAR TO HAVE BEEN  
COMPACTED AND IS TOO WET TO DO SO  
(PUMPING UNDER FOOT)

Scale: 1 square = \_\_\_\_\_

PAGE 46

NE CAPE  
5 YEAR REVIEW

USACE  
9/15/13



Scale: 1 square = \_\_\_\_\_ PAGE 47

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

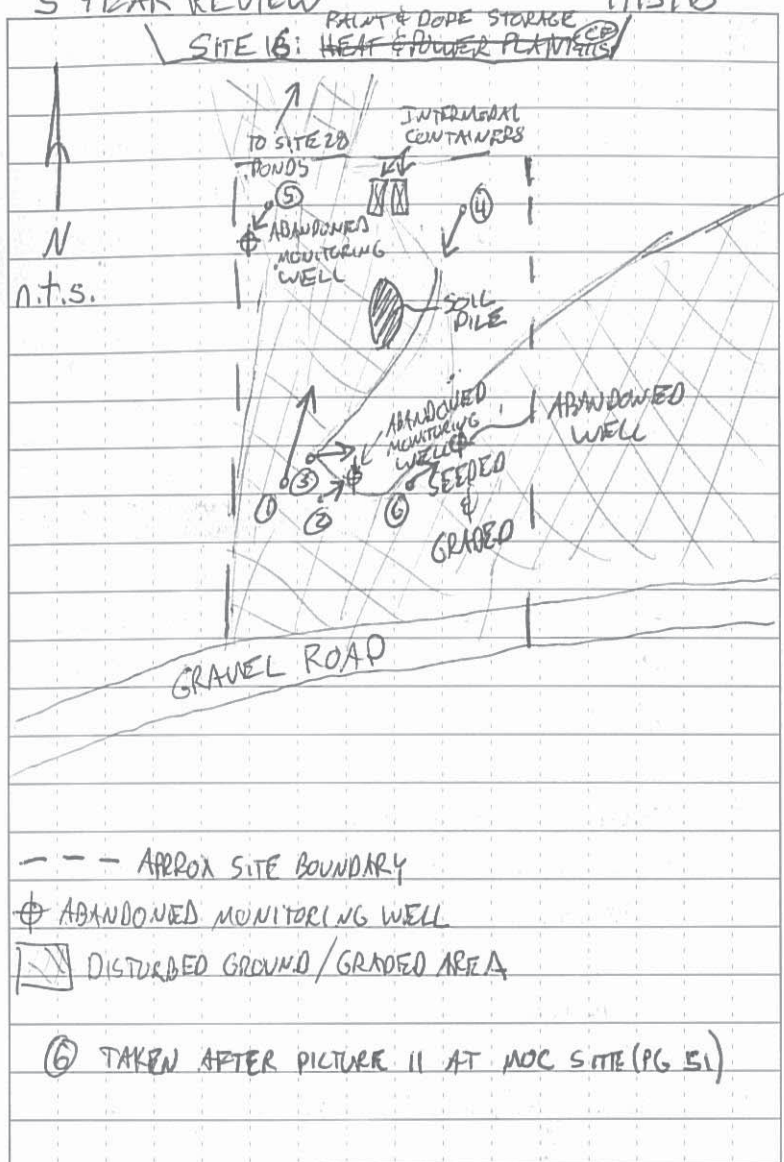
USACE  
9/15/13

- 1121 LEFT SITE 21: WASTEWATER TANK
- 1123 ARRIVED AT SITE 16: <sup>PAINT & ROPE STORAGE</sup> HEAT & POWER PLANT <sup>CD</sup> 9/15  
↳ 5 YEAR REVIEW FORM ON A SEPARATE FORM.
- 1125 MET WITH SURVEYORS TO SHOW WHERE  
TO SAMPLING LOCATIONS ARE
- 1155
- 1155 LEFT SITE FOR LUNCH
- 1230 LEFT CAMP FOR SITE
- 1241 ARRIVED ON SITE 16: <sup>PAINT & ROPE STORAGE</sup> HEAT & POWER PLANT <sup>CD</sup> 9/15
- 1251 OBSERVED AN ABANDONED MONITORING WELL  
THAT WAS NEAR THE SW CORNER OF THE  
FORMER BUILDING
- 1257 OBSERVED AN ABANDONED MONITORING WELL THAT  
WAS NEAR THE NW CORNER OF THE SITE.  
↳ SURFACE WAS FILLED WITH NATIVE MATERIAL  
SOME OF THE CONCRETE FROM THE SURFACE  
COMPLETION
- 1300 SITE HAS BEEN RECENTLY GRADED AND SEEDING  
ON THE SE PORTION

Scale: 1 square = \_\_\_\_\_ PAGE 48

NE CAPE  
5 YEAR REVIEW

USACE  
9/15/13



Scale: 1 square = \_\_\_\_\_ PAGE 49 *Site in the Rain*



NE CAPE

5 YEAR REVIEW

USACE

9/15/13

1301 MUCH OF THE WESTERN PORTION OF THE SITE IS BEING USED TO ACCESS SITE 28 OR AS AN EQUIPMENT STORAGE AREA - AN APPROX 3 YD PILE OF SOIL IS ON SITE

1302 GRADING OF THE SITE APPEARS TO PROMOTE POSITIVE DRAINAGE AND MITIGATE EROSION

1307 LEFT SITE 16: PAINT & ROPE STORAGE

1313 ON SITE (13, 15, 19, 27) FOR SITE WALKS  
↳ 5 YEAR REVIEW CHECKLIST ON SEPARATE FORMS

1325 MONITORING WELL \*<sup>NEEDS REPAIR</sup> MW88-10 → OK CONDITION

- WELL MONUMENT (FLUSH) CLOSES BUT NOT BOLTED
- WELL CASING IS OK AND FITTED WITH LOCKING CAP THAT IS NOT LOCKED

1332 MONITORING WELL MW 88-1 → POOR CONDITION

- WELL MONUMENT (FLUSH) DOES NOT CLOSE
- WELL CASING HAS FROST JACKED AND THE CAP IS NOT LOCKED

1335 MONITORING WELL MW88-3 → POOR CONDITION

- WELL MONUMENT (FLUSH) DOES NOT CLOSE
- WELL CASING HAS FROST JACKED AND THE CAP IS NOT LOCKED

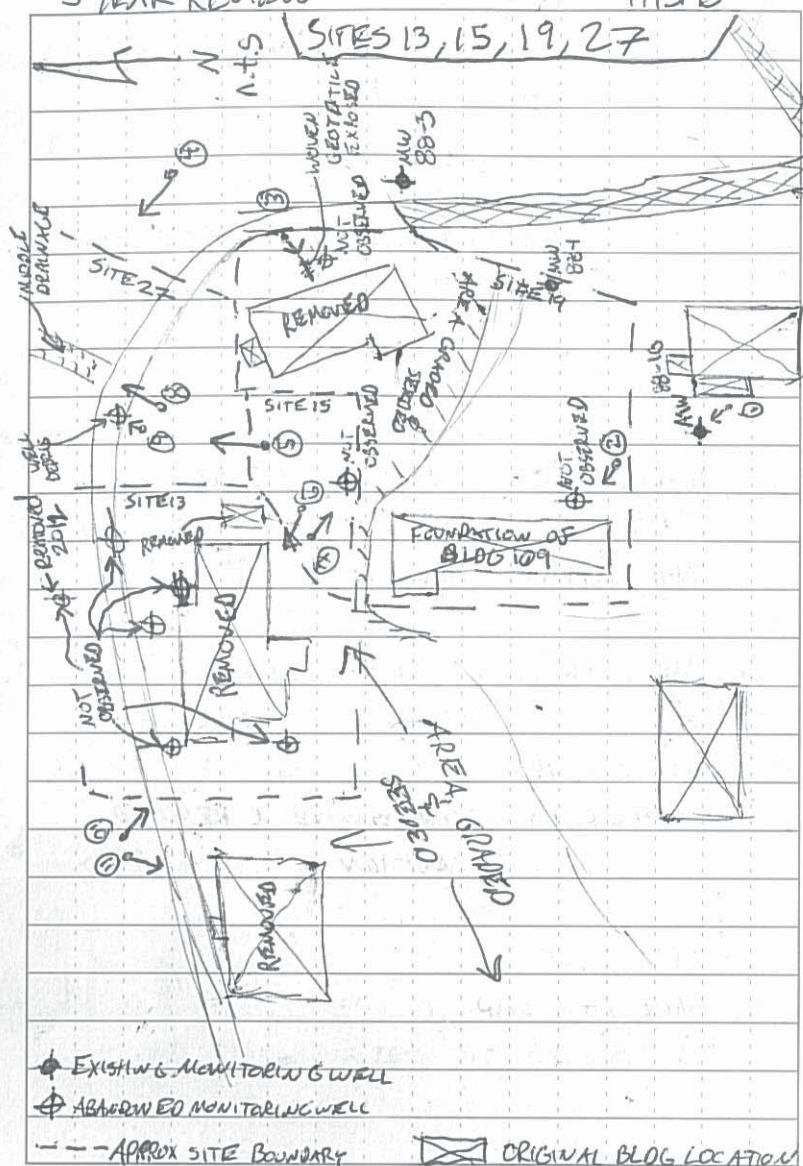
Scale: 1 square = \_\_\_\_\_ PAGE 50

NE CAPE

5 YEAR REVIEW

USACE

9/15/13



Scale: 1 square = \_\_\_\_\_ PAGE 51

*Rite in the Rain*

NE CAPE  
5 YEAR REVIEW

USACE  
9/15/13

1350 BUILDING AT SITE 13 HAS BEEN REMOVED  
ALONG WITH THE FOUNDATION

1353 BUILDING & FOUNDATION ON THE N/E PORTION OF  
SITE 19 HAS BEEN REMOVED. THE FOUNDATION  
FOR THE BUILDING ON THE SW PORTION OF  
SITE 19 REMAINS,

1355 SITES 13, 15, & 27 HAVE BEEN RECENTLY  
GRADED, AND SEEDED TO PROMOTE POSITIVE  
DRAINAGE AND MITIGATE EROSION ALONG WITH  
THE NORTHERN HALF OF SITE 19

1356, MONITORING WELLS IN THE CENTRAL PORTION  
OF THE MAIN OPERATIONS COMPLEX (MOC) WERE  
NOT OBSERVED

↳ LIKELY DECOMMISSIONED OR REMOVED  
DURING EXCAVATION

1400 LEFT SITE  
1415 BACK AT CAMP

Scale: 1 square = \_\_\_\_\_ PAGE 52

NE CAPE  
5 YEAR REVIEW

USACE  
9/15/13

1415 5 YEAR REVIEW PAPERWORK  
to and QC  
1800

End of Day

9/15/13

Scale: 1 square = \_\_\_\_\_ PAGE 53

*Rite in the Rain*



NE CAPE

5 YEAR REVIEW

USACE

9/16/13

Personnel: C. FELL  
J. ORCZEWSKA

Weather: Rain, 30-40°F  
light wind

PPE: Mod. Level D

Objectives: - Prep site for  
Demobe  
- QC paperwork  
- Interview QAR for  
any remaining  
questions

9/16/13

~~08~~ 0755: Bristol Tailgate

0800: Jacobs Tailgate

0830: Continue site paperwork  
and QC.

+300 CP 9/16/13

Scale: 1 square =

PAGE 54

NE CAPE

5 YEAR REVIEW

USACE

9/16/2013

1030 - Prep gear for Demob

~~1415 - FLIGHT TO HOME~~ CP 9/16/13

1300 - INTERVIEW W/ J. CRAWER (USACE)

↳ SITE 28 SEDIMENTATION POND(S)

- PLAN TO NOT CONSTRUCT  
AS SEDIMENT LOAD IN THE  
DRAINAGE IS LOW AND  
CONSTRUCTION WOULD LIKELY  
INCREASE RISK OF SPREADING  
CONTAMINATED SEDIMENT

↳ SITES W/ MNA REMEDIES

- PLAN TO REPAIR WELLS NEXT  
SEASON  
- PLAN TO AUGMENT NETWORK  
TO PROVIDE SUFFICIENT MONITORING  
NEXT YEAR

1415 - DEMOBE TO HOME

2000 - DEMOBE TO A/C

2130 - END OF DAY

Christopher D. Fell 9/16/13

Scale: 1 square =

PAGE 55

Rite in the Rain



NE CAPE  
5 YEAR REVIEW

USACE  
PHOTO LOG

\* CONTINUED FROM PS 61 \*

| Date    | Photo# | Dir. | Description             |
|---------|--------|------|-------------------------|
| 9/14/13 | Ø 7 Ø  | N/A  | Site 29 Drum in Pond    |
|         | Ø 7 1  | SE   | Site 29 Sugi River      |
|         | Ø 7 2  | NW   | Site 29 Sugi River      |
|         | Ø 7 3  | SW   | Site 8 South overview   |
|         | Ø 7 4  | NE   | Site 8 North Overview   |
|         | Ø 7 5  | W    | Site 10 Debris          |
|         | Ø 7 6  | N/A  | Site 10 Monitoring well |
|         | Ø 7 7  | S    | Site 10 Bristol Staging |
|         | Ø 7 8  | N    | Site 10 Bristol Staging |
|         | Ø 7 9  | N/A  | Site 10 Concrete Ring   |
|         | Ø 8 0  | N/A  | Site 10 drum lid        |
|         | Ø 8 1  | N/A  | Site 10 abandoned well  |
|         | Ø 8 2  | NW   | Site 11 overview        |
|         | Ø 8 3  | SW   | Site 11 overview        |
|         | Ø 8 4  | N/A  | Site 11 monitoring well |
| 9/14/13 | Ø 8 5  | N    | Site 11 seeding         |
| 9/15/13 | Ø 8 6  | N    | Site 28 Sedin Pond      |
|         | Ø 8 7  | W    | Site 28 Water filters   |
|         | Ø 8 8  | NW   | Site 28 Sediment Tubes  |
|         | Ø 8 9  | E    | Site 28 Intermid Pond   |
|         | Ø 9 0  | N    | Site 28 Flocculate add  |
|         | Ø 9 1  | N    | Site 28 Intermid Pond   |
| 9/15/13 | Ø 9 2  | NE   | Site 28 Overview.       |

Scale: 1 square =

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NE CAPE  
5 YEAR REVIEW

USACE  
PHOTO LOG

| Date    | Photo# | Dir | Description                            |
|---------|--------|-----|--|
| 9/15/13 | Ø 9 3  | SW  | Site 28 Overview                       |
|         | Ø 9 4  | E   | Site 28 Water Pump                     |
|         | Ø 9 5  | E   | Site 28 Sediment Trap                  |
|         | Ø 9 6  | N   | Site 28 Bristol Demob                  |
|         | Ø 9 7  | S   | Site 28 Overview                       |
|         | Ø 9 8  | S   | Site 28 Dredge                         |
|         | Ø 9 9  | E   | Site 28 Drainage to Sugi               |
|         | 1 Ø Ø  | E   | Site 28 Wattles before Sugi            |
|         | 1 Ø 1  | W   | Site 21 Road                           |
|         | 1 Ø 2  | W   | Site 21 Road                           |
|         | 1 Ø 3  | SE  | Site 21 Backfill                       |
|         | 1 Ø 4  | E   | Site 21 Backfill                       |
|         | 1 Ø 5  | W   | Site 21 Silt Fence                     |
|         | 1 Ø 6  | S   | Site 21 Seeding                        |
|         | 1 Ø 7  | E   | Site 21 Road                           |
|         | 1 Ø 8  | N   | Site 16 Overview <sup>S28</sup> Access |
|         | 1 Ø 9  | N/A | Site 16 Abandoned well                 |
|         | 1 1 Ø  | E   | Site 16 Overview                       |
|         | 1 1 1  | S   | Site 16 Overview                       |
|         | 1 1 2  | N/A | Site 16 abandoned well                 |
|         | 1 1 3  | N   | Site 16 Abandoned well                 |
|         | 1 1 4  | N   | MOC Overview                           |
| 9/15/13 | 1 1 5  | N   | MOC Overview                           |

Scale: 1 square =

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Rite in the Rain



USACE  
PHOTO LOG

Scale: 1 square = 250 m

USARE  
PHOTO LOG

Scale: 1 square = 200 ft

Rite in the Rain



NE CAPE  
5-YR REVIEW

USACE  
PHOTO LOG

| DATE    | PHOTO # | DIRECTION<br>FACING | DESCRIPTION                |
|---------|---------|---------------------|----------------------------|
| 9/13/13 | 024     | N                   | Site 31 Foundations NE     |
|         | 025     | N                   | Site 7 Debris              |
|         | 026     | N/A                 | Site 7 Metal Debris        |
|         | 027     | N/A                 | Site 7 Metal Debris        |
|         | 028     | N                   | Site 7 Rusted Drums        |
|         | 029     | N                   | Site 7 debris in Ponds     |
|         | 030     | W                   | Site 7 landfill cap        |
|         | 031     | N                   | Site 7 Debris in Pond      |
|         | 032     | NW                  | Site 7 Debris in Pond      |
|         | 033     | W                   | Site 7 Debris in Pond      |
|         | 034     | E                   | Site 7 landfill cap        |
|         | 035     | E                   | Site 7 top of cap          |
|         | 036     | E                   | Site 7 Armored rock        |
|         | 037     | N/A                 | Site 7 Debris              |
|         | 038     | S                   | Site 7 Debris              |
|         | 039     | N/A                 | Site 7 Abandoned well loc. |
|         | 040     | S                   | Site 7 Debris in Pond      |
|         | 041     | N/A                 | Site 7 Possible Drum       |
|         | 042     | N/A                 | Site 9 Abandoned well loc  |
|         | 043     | W                   | Site 9 Diversion trench    |
|         | 044     | W                   | Site 9 landfill cap        |
|         | 045     | E                   | Site 9 Vegetation          |
| 9/13/13 | 046     | N                   | Site 9 Pond near cap       |

Scale: 1 square =

PAGE 60

NE CAPE  
5-YR REVIEW

USACE  
PHOTO LOG

| DATE    | PHOTO # | DIRECTION<br>FACING | DESCRIPTION                               |
|---------|---------|---------------------|---|
| 9/13/13 | 047     | S                   | Site 9 Culvert                            |
| 9/14/13 | 048     | S                   | Site 1 Pond                               |
|         | 049     | E                   | Site 1 Cracking <sup>on</sup> edge        |
|         | 050     | E                   | Site 1 Loading equip                      |
|         | 051     | NE                  | Site 1 Runway                             |
|         | 052     | NE                  | Site 1 4-wheel trail off runway           |
|         | 053     | W                   | Site 3 Overview                           |
|         | 054     | SW                  | Site 3 Pond on site                       |
|         | 055     | S                   | Site 3 Pond on site                       |
|         | 056     | SE                  | Site 3 Recent excavation                  |
|         | 057     | N/A                 | Site 3 Sheen in Pond                      |
|         | 058     | N/A                 | Site 6 Abandoned well                     |
|         | 059     | N/A                 | Site 6 Abandoned well                     |
|         | 060     | E                   | Site 6 Bristol Staging                    |
|         | 061     | NW                  | Site 6 Bristol Staging                    |
|         | 062     | E                   | Site 6 Nearby Pond                        |
|         | 063     | E                   | Site 29 Overview <sup>from</sup> off Road |
|         | 064     | W                   | Site 29 Overview from Road                |
|         | 065     | E                   | Site 29 Sugi River                        |
|         | 066     | SE                  | Site 29 Bristol Water Intake              |
|         | 067     | E                   | Site 29 Sugi River                        |
|         | 068     | E                   | Site 29 Culvert                           |
| 9/14/13 | 069     | W                   | Site 29 Sugi River                        |

\* CONTINUED ON PAGE 56 \*

Scale: 1 square =

PAGE 61

Site in the Rain



## 5 YR REVIEW

USACR

## WASTE TRACKING

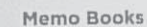
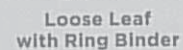
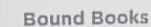
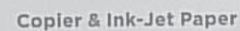
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**APPENDIX D**  
**Photograph Log**

**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**

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**Site 7 Cargo Beach Road Landfill**  
**Northeast Cape – St. Lawrence Island, Alaska**

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**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 1 – 7 August 2013  
Cargo Beach Road and Site 7 Landfill. View facing southwest.**



**Photo No. 2 – 7 August 2013  
Site 7 Landfill East. View facing northwest.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 3 – 7 August 2013  
Site 7 Landfill North Corner. View facing southeast.**



**Photo No. 4 – 7 August 2013  
Site 7 Landfill Southeast corner. View facing southwest.**

**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 5 – 12 September 2013  
Overview of Northeast Cape Site. View facing north.**



**Photo No. 6 – 14 September 2013  
View of a pond adjacent to Site 1. View facing south.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 7 – 13 September 2013  
Wood debris at Site 7. View facing north.**



**Photo No. 8 – 13 September 2013  
Metal debris at Site 7.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 9 – 13 September 2013  
Metal debris at Site 7.**



**Photo No. 10 – 13 September 2013  
Drum debris located near a pond at Site 7. View facing north.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 11 – 13 September 2013  
Debris in pond located adjacent to landfill cap at Site 7. View facing north.**



**Photo No. 12 – 13 September 2013  
Condition of northern edge of landfill cap at Site 7. View facing west.**

**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 13 – 13 September 2013  
Miscellaneous debris in pond adjacent to landfill cap at Site 7. View facing north.**



**Photo No. 14 – 13 September 2013  
Miscellaneous debris in pond near landfill cap at Site 7. View facing northwest.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 15 – 13 September 2013  
Metal debris in pond adjacent to landfill cap at Site 7. View facing north.**



**Photo No. 16 – 13 September 2013  
Condition of northern edge of landfill cap at Site 7. View facing west.**

**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 17 – 13 September 2013**  
**View standing on top of landfill cap at Site 7. View facing northwest.**



**Photo No. 18 – 13 September 2013**  
**Condition of armored rock on the southern border of landfill cap at Site 7. View facing east.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 19 – 13 September 2013  
Debris protruding through the southern side of landfill cap at Site 7.**



**Photo No. 20 – 13 September 2013  
Debris located with the armored rock at Site 7. View facing south.**



**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 21 – 13 September 2013  
Abandoned monitoring well filled with bentonite at Site 7.**



**Photo No. 22 – 13 September 2013  
Debris in pond south of landfill cap at Site 7. View facing south.**

**Site 7 Cargo Beach Road Landfill  
Northeast Cape – St. Lawrence Island, Alaska**



**Photo No. 23 – 13 September 2013  
Apparent drum located in pond south of landfill cap at Site 7.**

**APPENDIX E**  
**Completed Interview Questionnaire Forms**



### Interview Record

|                                      |   |
|--------------------------------------|---|
| Name: Robert Annogiyuk               | Date: 1-15-2014                                     |
| Organization: NALEMP Project Manager | Phone Number:                                       |
| Title:                               | Email:  |
| Interview Type: Mail/Email           | Phone/In Person <input checked="" type="checkbox"/> |
| Site (s) Name:                       | Northeast Cape, St. Lawrence Island                 |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

NALEMP - Program moves quickly. Sometimes too quickly

2. From your perspective, what effects have site operations had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

Not well informed Because of some of the Technical Terms.

Contaminants & what they mean.

- More Introductory information would be helpful so people can get a better perspective.

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

**6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?**

**7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?**

**8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?**

### Interview Record

|                                |   |
|--------------------------------|---|
| Name: <i>Orville Toolie</i>    | Date: <i>1-15-14</i>                            |
| Organization:                  | Phone Number:                                   |
| Title: <i>Community Member</i> | Email:  |
| Interview Type:                | Mail/Email                      Phone/In Person |
| Site (s) Name:                 | Northeast Cape, St. Lawrence Island             |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

*doing pretty good - a lot cleaner than  
Savannah*

2. From your perspective, what effects have site operations had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?



3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

No.

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

People of Sawoonga know what's going on.  
→ letters from the corps to update the community

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

use the area for local housing

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

- Would like to have more Evaluation of materials  
taken off the site + used as Building materials

ef

## Interview Record

|  |                                     |  |
|--|-------------------------------------|--|
| Name: <i>Kukulget Inc</i><br><i>members of Board of Directors.</i> |                                     | Date: <i>04/2014</i> <i>01/15/2014</i> |
| Organization:  |                                     | Phone Number:                          |
| Title:   |                                     | Email:                                 |
| Interview Type:  | Mail/Email                          | Phone/ <u>In Person</u>                |
| Site (s) Name:   | Northeast Cape, St. Lawrence Island |  |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

\* Cleanup is a good thing

→ \* How much of that backfilled gravel is contaminated or over contaminated soil?

→ 1952 agreement to Native Village of Saavoonga to return site to original conditions.

2. From your perspective, what effects have site operations had on the surrounding community?

Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

\* Concerns about what contaminants were left there near the camp.

\* Military use - leftovers were dumped and community during members picked through the dump to get to the air!

3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

- \* Reports that Bristol + employees were taking four wheelers and beachcombing which violated the agreement with the landowners. (Every summer since work has been performed)
- \* Medivac injured personell while cleanup going on (2012 and 2013)

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

Yes.

- Don't get too technical - put it in laymen's terms.
- more information about ~~how~~ what areas are clean and which aren't.

\* → Decision Document wasn't explained or presented to the community. } major concern

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

- \* Site walk to previous areas to get updates.  
Tribal Council or Corporation
- \* Add signage to the landfills (around the perimeter) to notify site visitors.
- \* Add monitoring wells to landfills and MOC. Include signs or flags to avoid hitting them in the winter.

would at least have a copy of the signed document.



6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

- Cap was seeded with "local grass"
- \* "Grass can't grow on rocks" & Open up cap take out debris and change cap material add soil.

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

- \* Don't drink water from NE Cape anymore
- \* No longer use Kangukhsam Htn Spring.

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

- \* Left 2 landfills; if you are already taking out all of that soil; why not remove the debris.
- \* Site 7; engine, airplane, transformers, batteries, road grader, barrel all seen beneath the surface, Cleanup was only at the surface.
- \* moc. all utilidors left in place 1999-2004; more utilidors left in place moc. one at Rd 98, loading frame was located.
- \* Septic tank between Site 21 and Site 28.  
→ Followup; with information to community or Remedial Efforts.

+ Another dump <sup>South of Radome Site</sup>  
<sub>Site located</sub> (Site 33?)

"Clean it up"

Community members observed helicopter activity around to the south side of the mountain. Believed to haul unknown

\* Commercial fishing hot spot outside of Sugi River Drainage. Close to land.

\* West side of mtn Kangukkam Mtn.  
10+ drums seen while hunting

\* Sludge at Site 24 below ponds.  
Barrels still remain.

\* Long-term monitoring of the Sugi River  
The lagoon at the ~~sub~~ end of Sugi  
freezes up. When it opens water  
movement increases

\* Corps should maintain the airstrip

\* POL sites limited to 2ft below ground  
water. Not getting to clean. Contamination  
Remains

\* Fragments of asbestos + concrete slabs  
left at Site 31 + MOC. would like them  
removed. → What is underneath them -  
what if we disturb them to use the land?

### Interview Record

|                                       |   |
|---------------------------------------|---|
| Name: <u>Dean Kolawiyi</u>            | Date: <u>1-15-2014</u>  |
| Organization: <u>community member</u> | Phone Number:   |
| Title:                                | Email:  |
| Interview Type:                       | Mail/Email <input checked="" type="checkbox"/> Phone/In Person <input type="checkbox"/> |
| Site (s) Name:                        | Northeast Cape, St. Lawrence Island   |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

Clean-up part is going ok. Happy work is moving Forward

2. From your perspective, what effects have site operations had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

**3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.**

**4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?**

**5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?**



6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

When can you get information. Why are taking so long?  
Feels like some community concerns are not being addressed.  
(Health)

Family members were put at risk by participating  
in clean-up prior to Hazwoper.

### Interview Record

|                                       |                                     |
|---------------------------------------|-------------------------------------|
| Name: <u>Name withheld.</u>           | Date: <u>1-15-2014</u>              |
| Organization: <u>Community member</u> | Phone Number:                       |
| Title:                                | Email:                              |
| Interview Type:                       | Mail/Email Phone/ <u>In Person</u>  |
| Site (s) Name:                        | Northeast Cape, St. Lawrence Island |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

Email maps of what areas are above the cleanup level.

2. From your perspective, what effects have site operations had on the surrounding community?  
Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

- Beschcombs are concern, because in my opinion I consider it trespassing.

3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

Liked the format of the RAS meetings. good information.

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

Would like to move out there in the future



### Interview Record

|  |   |
|--|---|
| Name:<br><i>Name Withheld</i>            | Date:<br><i>01/15/2014</i>              |
| Organization:<br><i>Community Member</i> | Phone Number:                           |
| Title:                                   | Email:                                  |
| Interview Type:                          | Mail/Email      Phone/ <u>In Person</u> |
| Site (s) Name:                           | Northeast Cape, St. Lawrence Island     |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

- want the whole area cleaned up - not just the individual site. lack of information / understanding
- concern about ammo, weapon storage at NE Cape - where location is, if contamination remains.

2. From your perspective, what effects have site operations had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

Collens of heating fuel -

Health problems in Savoonga -  
problems that didn't exist before

3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

NO

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

No - would like more information about what they have found

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

NO

6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

\* No good understanding of the DD and how it was signed etc.

\* SW Cape, Sipekapak Camps,  
— material used contain lead-based paint that originated at NE Cape. Paint and tar used.

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

NO

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

Do not have confidence that the land is clean.  
"I don't want to use that land! It might still be dirty."

### Interview Record

|  |  |
|--|--|
| Name: Pamela Miller and Vi Waghiyi   | Date: 1-24-14  |
| Organization: Alaska Community Action on Toxics and Native Village of Savoonga Tribal Member (Vi)                                  | Phone Number: (907) 222-7714   |
| Title: Executive Director (Pamela Miller) and Environmental Health and Justice Program Director and NVS Tribal Member (Vi Waghiyi) | Email: <a href="mailto:pamela@akaction.org">pamela@akaction.org</a> and <a href="mailto:vi@akaction.org">vi@akaction.org</a> |
| Interview Type: <b>Mail/Email</b>  |  |
| Site (s) Name:   | Northeast Cape, St. Lawrence Island  |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

#### **1. What is your overall impression of the project (general sentiment)?**

The clean-up of the Northeast Cape site is far from complete and not protective of the health of the people living on the Island. We believe that the site was not properly characterized and thus the remediation has not been fully informed enough to identify and remove important source areas of contamination. Source areas of contamination are still contaminating the Suqi River and ground water. We are concerned about continuing contamination of the Suqi River and estuary from fuel-related compounds from prior large spills, PCBs, and pesticides. The Suqi River, once a prime fishing location for the people of St. Lawrence Island, has not recovered because of the damage caused by the military occupation, activities, and on-going contamination from sources areas.

#### **2. From your perspective, what effects have site operations had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?**

The original community at NE Cape, the Native Village of Northeast Cape, was and continues to be displaced by the military operations at NE Cape. The people of St. Lawrence Island intend to re-establish the community at NE Cape, however cannot do so until they are assured that the cleanup is protective of health and well-being for a residential community and future generations. People cannot safely use the NE Cape area for traditional hunting and fishing or for the harvesting of food (greens and berries) and medicinal plants. The ground- and surface sources of drinking water sources are not safe.



Monitored Natural Attenuation is not an acceptable remedy as it will take decades for levels of contamination to reach “safe” levels. The contamination has already harmed the health of generations of families associated with NE Cape. Overall, we do not think the remedies are protective of health and the environment. We think and the tribe supports that other active remediation methods must be used, including additional and effective removal as well as active chemical oxidation as proposed by the RAB Technical Advisor.

Cleanup standards are far from adequate. For example, DRO cleanup standards for soil are 9,200 mg/kg. At those levels, contaminated soils will continue to serve as a source of contamination to ground- and surface waters. We believe that the contamination remaining in landfill sites at NE Cape is of great concern for health since they were simply capped and will remain in place and unabated. Leachate from these landfills will continue to harm and present hazards to the Suqi River watershed, fish and wildlife, and people’s health.

Detection limits used for analysis and Aroclor analysis rather PCB congener analysis are not adequate methods to properly characterize the nature and extent of contamination. The analytical methods are not sensitive enough to assess the range of contaminants known to exist in the sediments, soils, water at NE Cape. Analyses should include: congener-specific PCBs, mirex, HCB, dioxins/furans, DDE, BTEX, PAHs, and others. Also, we think that TCE and other solvents, as well as vinyl chloride should be included among the analytes. People are also concerned that there might be undisclosed information about what harmful substances were used and/or left at NEC, including the possible use of radionuclides/radiation hazards.

The Army Corps of Engineers has not conducted proper government-government consultation according to their legal obligations. The past Corps of Engineer’s Project Managers have not been culturally sensitive.

**3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.**

The military was not been responsible for posting proper signage in the Yupik language to warn people about the hazards of the site following their abandonment of the site. Therefore, people salvaged hazardous materials and used them for homes and cabins. Also, to this day, there are no warnings concerning the danger of consuming water from the Suqi River.

**4. Do you feel well informed about the site’s activities and progress? Have there been communications or activities regarding the site?**

We had to submit a petition to the Army Corps of Engineers to establish a Restoration Advisory Board (RAB). Although the RAB meetings provide information sharing, concerns and information requests expressed by community members and our technical advisor have not been respected or acted upon.

**5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?**

The site cleanup should not be closed at this stage because of the remaining contamination. Long-term monitoring should include re-installment at sites where monitoring wells have been removed and installment of new monitoring wells in key locations such as down gradient from

the Main Complex and the landfill sites (including sites 7, 9, 10, for example). Integrative sampling methods should be employed within the Suqi River (such as SPMDs), as well as sediments cores within the Suqi River and its estuary, biological sampling of fish and wildlife that use the NEC area. As mentioned above, proper analytical techniques and improved characterization must be done. As stated by the RAB technical advisor, the estuary needs improved characterization and should be subjected to innovative remedial measures to reduce the concentration and distribution of chlorinated (PCBs, mirex, DDE and others), non-chlorinated organics, and metals (e.g. Hg). The Corps of Engineers has disregarded the on-going contamination by PCBs in the Suqi River and effects to water quality of the soluble PCB congeners and input to the estuary.

**6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?**

Yes. The tribe should be an official signatory to the Decision Document. The site should continue to receive active remediation and not be closed – additional monitoring and remediation is needed as discussed above.

**7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?**

As described above, the remedial actions have not been sufficient to protect the health of people of St. Lawrence Island. Physical processes used to remove contaminated sediments are likely or will likely uncover additional contaminated sediments. This is not acceptable since previous sampling may not have included elevated concentrations. Disturbed samples are a new environment and may result in further exposures.

The cleanup is NOT complete and unless it is completed, it will continue to cause harmful exposures and prevent adequate health protections.

**8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?**

The RAB community members, tribal leaders, and RAB technical advisor's knowledge, concerns, and recommendations have not been followed or addressed by the Corps of Engineers or their contractors. Jacobs Engineering, as the third party independent reviewer, should review past RAB meeting minutes, RAB member statements/comments, and Technical Advisor statements and include these in the Review since most of these expressed concerns have not been addressed. These concerns and recommendations must be addressed for the protection of the health and well-being of the St. Lawrence Island Yupik people and future generations.

| INTERVIEW RECORD   |   |  |
|--|---|--|
| Site Name: Northeast Cape  |   | FUDS ID No.: F10AK096903   |
| Site Location: Northeast Cape, Saint Lawrence Island, Alaska   |   |  |
| Subject: First 5-Year Review   |   | Date: January 27, 2014   |
| Interview Type: <input type="checkbox"/> Telephone <input type="checkbox"/> Visit <input type="checkbox"/> Email <input checked="" type="checkbox"/> Questionnaire |   |  |
| Interviewee:   |   |  |
| Name: Curtis Dunkin  | Title: Environmental Program Specialist | Organization: Alaska Department of Environmental Conservation            |
| Telephone No: 907.269.3053<br>Fax No: 907.269.7649<br>E-Mail Address: Curtis.dunkin@alaska.gov   |   | Street Address: 555 Cordova St.<br>City, State, Zip: Anchorage, AK 99501 |

The following general questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

| INTERVIEW QUESTIONS   |
|---|
| <p><b>1. What is your overall impression of the project?</b></p> <p>Remedial activities at Northeast Cape (NEC) have been ongoing for over 15 years; of which mobilizations to conduct remedial actions and remedy implementations have been occurring at the site the past 5 consecutive field seasons. In the past six years the Army Corps of Engineers (Corps) has prioritized the resources necessary to implement the cleanup at NEC and it is ADEC's understanding that the Corps plans to continue doing so until all remedies are implemented and protectiveness is achieved at all NEC sites. Remedial actions at NEC have been a very large and complicated undertaking due to the remoteness of the site, the short field season, and the complexity of the contamination issues. Overall, ADEC perceives the remedial activities to have occurred in an adequate and timely manner that is in accordance and consistency with CERCLA law and ADEC regulations. To date, a large majority of the planned removal actions have been completed and it is ADEC's understanding that the Corps plans to continue mobilizing and conducting remedial actions in the 2014 field season as well as in future years to continue cleaning up and/or monitoring the contamination at the NEC sites.</p> <p>ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.</p> |
| <p><b>2. From your perspective, what effects have site operation had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?</b></p> <p>Saint Lawrence Island residents and community members have expressed both gratitude that the NEC FUDS is being cleaned up as well as concerns regarding the overall protectiveness of the remedies in the 2009 Decision Documents. From ADEC's perspective, the immediate effects of site operations on the surrounding community (Savoonga and the Native Village of NEC) have been positive mainly due to the decrease in human and environmental exposure risks via the removal and offsite disposal of extensive volumes of contaminated soil. ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.</p>  |
| <p><b>3. Are you aware of events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.</b></p> <p>ADEC is not aware of any events of vandalism, trespassing, or emergency responses from local authorities that have occurred in association with the NEC FUDS and/or its associated contamination issues.</p>  |

**4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?**

ADEC perceives that it is well informed about the remedial activities and progress associated with NEC. ADEC staff travel to Savoonga twice a year to attend the semi-annual Restoration Advisory Board meetings. ADEC staff travel to NEC at least once annually to conduct multi-day facility-wide site inspections of the remedial activities being conducted during the field season; and has in recent years conducted two separate site inspections. ADEC staff regularly participate in in-person meetings and teleconferences with project team members as needed. ADEC staff, per ADEC's CERCLA regulatory authority, review, submit comments, and grant approvals of work conducted in association with the contaminated sites issues at NEC. During field seasons when remedial activities are being conducted at NEC, the Corps has kept ADEC apprised with daily quality control and progress reports. The Corps has also notified ADEC in a timely manner whenever there has been a change in site conditions and/or when it has required ADEC's review, input, and approval to implement remedial activities.

**5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?**

Yes. ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.

**6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?**

ADEC is not aware of any problems which have required or will require changes to any of the selected remedies or the two 2009 Decision Documents. ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.

**7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?**

ADEC is not aware of any changes in land use, access, or site conditions associated with NEC which have occurred in the past five years that have had or may have an impact on protectiveness. ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.

**8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?**

ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.

**9. Miscellaneous Comments:**

ADEC will be submitting comments pertaining to each specific site being evaluated as part of this First Five-year Review for NEC to be considered and included in the draft 2014 Five-year Review Report after ADEC has received and reviewed the draft 2013 NEC Remedial Action Report.

|  |
|--|
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|  |
|  |



## Interview Record

|  |                                     |
|--|-------------------------------------|
| Name: <i>Mitchell Kiyuklook</i>  | Date: <i>4 Feb 2014</i>             |
| Organization: <i>Pres. of Native Village of</i>                        | Phone Number: <i>N/A</i>            |
| Title: <i>Sauvonga</i>   | Email:                              |
| Interview Type:                      Mail/Email <u>Phone</u> In Person |                                     |
| Site (s) Name:   | Northeast Cape, St. Lawrence Island |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

## Interview Questions

1. What is your overall impression of the project (general sentiment)?

*- looks like to be more cleaned up*  
*Buried drums - at the landfills - would like them cleaned up.*

*Recycling Metals place - found trace of radiation -*

*NALEMP coordinator*

*FOAT*

*EPA*

*Ron Scudato*

*Elders speak about dead walrus - Black, burned skin.*

*Conf. call.  
29 Jan 14?*

*Winifred James (Gambell)*

2. From your perspective, what effects have site operations had on the surrounding community?

Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

*- Increase incidence of cancer - concerned with the high rate of cancer on the island.*

*- High rate of PCB in the blood.*

3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

Collection of construction materials for use around the island.  
→ historic  
a lot of exposure occurred during this time.

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

Not really -

→ help to understand what cleanup levels mean.  
→ Better explanation of what the regulations mean and how the cleanup levels were established.

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

- Cleanup should be longer.  
- DRO spill at Site II → could smell the DRO approx 6-7 miles. — DRO level is too high.

6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

- Possible radiation that was identified on recycled metals. (Trace identified - unclear on location or source)
- Want it removed from the land.

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

- Sugi river ~~has~~ does not have as much fish as before
- Seal numbers have gone down - slowly returning
- Subsistence is affected. The area is not used as much as it used to. Slowly returning.

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

- \* Do more research and testing of the soil + water.
- Provide information before the reports come out. Native Village of Savoonga

- sampling of the reindeer again -
- now that cleanup efforts have been initiated.
- dust stirrup, leaching, etc.
- ↳ affecting lichen + grass.

## Interview Record

|                                       |                                     |                   |
|---------------------------------------|-------------------------------------|-------------------|
| Name: Paul Rookok                     |                                     | Date: 04 Feb 2014 |
| Organization: Tribal Gov. in Savoonga |                                     | Phone Number: N/A |
| Title:                                | Email:                              |                   |
| Interview Type:                       | Mail/Email                          | Phone/In Person   |
| Site (s) Name:                        | Northeast Cape, St. Lawrence Island |                   |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

## Interview Questions

1. What is your overall impression of the project (general sentiment)?
- \* Cleanup missed in areas that weren't included as a Sites
  - As a laborer we were told to only cleanup the areas that were within the site.
  - Wires and cables remain and were mostly covered by vegetation & water.
  - "overall it's a fair job - not a good one."
  - \* more sampling should have been done during the RIs to get a better sense of what's there.
  - Took a lot of talking to get an old truck remove from landfill east of if area
2. From your perspective, what effects have site operations had on the surrounding community? Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?
- only a handful of people know about the cleanup.
  - most shareholders don't have any ideas.
  - To get information out - more details are needed to be explained - USE byman's terms.
  - To the corporation



3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

Shareholders in Gambell complaining about recreational activities in their leisure time - Employees that were not shareholders were riding ATV offsite and rumors indicate they were taking artifacts, old ivory, etc. Things that belong to the Native Corp. These are cultural and traditional items.

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

- We need something that explains what's been cleaned up that everyone can understand.
- only a handful of people know - just people that worked there.
- Pictures are nice however it doesn't tell a complete story. What they are doing and why?

5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

- Work with Native Corp at Savoonga + Gambell and the IRA.
- protect the artifacts + respect environment

6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

need a better understanding of DD.

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

Site belongs to Gambell & Sauvconga.

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

Should be up to the Corporations  
& not any body

## Interview Record

|   |                                     |
|---|-------------------------------------|
| Name: <u>Deltbert Pungowiji</u>   | Date: <u>04 Feb 2014</u>            |
| Organization: <u>Community Member</u>   | Phone Number: <u>N/A</u>            |
| Title: <u>Former Pres of Nat. Village of Savonoga</u>   | Email: <u>—</u>                     |
| Interview Type: <input type="checkbox"/> Mail/Email <input checked="" type="checkbox"/> Phone/In Person |                                     |
| Site (s) Name:  | Northeast Cape, St. Lawrence Island |

The following interview questions are based on EPA guidance (EPA 540-R-01-007). Questions may be left unanswered if they do not apply to you.

### Interview Questions

1. What is your overall impression of the project (general sentiment)?

- Happy that Congress is moving forward and getting cleanup going
- Very disappointing.
- It has been a huge ordeal to get the Corps to clean up the site to Residential Cleanup levels.
- From the Beginning there is always been a concern with cost not safety. It's disappointing.

2. From your perspective, what effects have site operations had on the surrounding community?

Are you aware of any community concerns/complaints regarding site operations, administration, implementation, or overall protectiveness of the remedies in the Decision Documents?

- Concerns* →
- \* The Native Village of Savonoga should be included as a signatory on the Decision Document. Esp. given the agreement that took place on 1952. (Ratified by Sec. of State)
  - Health of the people on island particularly cancer. PCB levels are very high! Causes fear in the community. Common phrase is "Who's next?"

Health has been affected dramatically.

3. Are you aware of any events, incidents, or activities at the site such as vandalism, trespassing, or emergency responses from local authorities? If so, please provide details.

NO.

→ No - ACAT and Ron Scudato have been instrumental in getting information to the community. → Communication is lacking where are we at with the cleanup?

4. Do you feel well informed about the site's activities and progress? Have there been communications or activities regarding the site?

NO. lack of communication + honesty.

- Difficulty to deal w/ Corps Don't want to deal w/ Corps of AK - should be dealing with Washington. Government - to - Government relationships are non-existence.  
- Repatriation Act of Aleuts.

→ Eye to Eye. There No need to deal with Alaska. This is a federal issue.

→ 5. Do you have any suggestions regarding future operation, maintenance, and monitoring (OMM) at the site?

• This should be negotiated with tribal governments - they need to be involved.

• get the debris out of landfills - not satisfied - theres still possibility for things to migrate out. Its just gravel for a cap.



6. Have any problems been encountered which required, or will require, changes to the remedy or Decision Document?

- \* Metals taken off island to be recycled have shown levels of radiation
- \* Seal's ~~numbers~~ numbers have decreased in the area.
- \* Determining DOL was biogenic ~~no~~ was inaccurate ~~of~~ without a reasonable doubt.

7. Are you aware of any changes in land use, access, or other site conditions that have occurred in the past five years that you feel may impact the protectiveness of the site?

- People are scared of the area. Prior to the cleanup there was high levels of PCB -
- Wash all of the berries
  - Dust stirred up is a concern - did this result in spread of PCBs?

8. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

Most Imp. - It is illegal that they signed the DD and excluded the Native Village of Savoonga - we have strong opposition to the ~~remedies and the~~ document itself. I would like closure brought to this cleanup by including Native Village of Savoonga and have a Congressional hearing in Washington. The island needs recognition for the role they played for this country and the mistreatment of the people's human rights.

PCB as high as 7.5 ppm on the island.

→ Record of Decision Should be Native Village  
of Savoonga and the Commander  
and Chief not corps and state of AK.

**APPENDIX F**  
**Public Notice Documentation**

## **US Army Corps of Engineers Announces Start of Five-Year Review**

The United States Army Corps of Engineers at Joint Base Elmendorf-Richardson (JBER) announces the beginning of the Five-Year Review of cleanup remedies being implemented at the Northeast Cape Formerly Used Defense Site located on St. Lawrence Island, Alaska.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 121, and the National Contingency Plan requires that remedial actions which result in any hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure be subject to a five-year review.

The purpose of the Five-Year Review is to evaluate whether the remedies selected to clean up contaminated sites are operating as designed and remain protective of human health and the environment.

Detailed information concerning the Northeast Cape cleanup effort is available at the following information repositories :

**Alaska Resources Library & Information  
Services, University of Alaska, Anchorage  
3211 Providence Drive  
(907) 786-1871**

**Savoonga City Hall  
(907) 984-6614**

**Gambell Sivuqaq Lodge  
(907) 985-5335**

The findings of the Five-Year Review will be available for review after September 2014.

Interested persons can participate in the Five-Year Review process through December 2013 by responding to a questionnaire available from:

**Kevin Maher, Jacobs Engineering  
4300 B Street, Suite 600  
Anchorage, AK 99508  
kevin.maher@jacobs.com (907) 563-3322**

Information on the cleanup process is shared with interested persons through periodic Northeast Cape public meetings. If you would like to be added to the contact list, contact Valerie Palmer at (907) 753-2578 or [POA-FUDS@usace.army.mil](mailto:POA-FUDS@usace.army.mil)

# Publisher's Affidavit

UNITED STATES OF AMERICA,

State Of Alaska

Second Division

SS:

[Signature]

, being first duly

sworn on oath deposes and says:

That I am and was at all times herein this affidavit mentioned,

Administrator-ads

of THE NOME NUGGET, a

newspaper of general circulation and published weekly at

Nome, Second Division, State of Alaska, and online that

the start of 5-yr review

St Lawrence Island

a printed copy of which is hereto annexed, was published

in said paper once and every week for one

successive and consecutive weeks in the issues of the following

dates:

August 22, 2017

X [Signature]

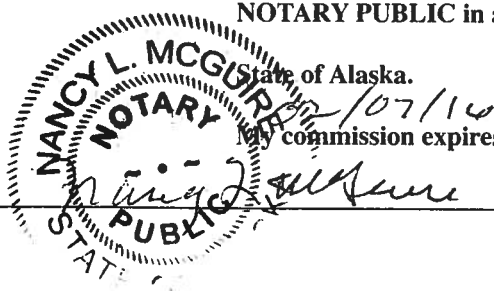
SUBSCRIBED and SWORN to before me this

2nd day of October, 2017

NOTARY PUBLIC in and for the

State of Alaska.

commission expires





# FIVE-YEAR REVIEW

## NORTHEAST CAPE FORMERLY USED DEFENSE SITE

### ST. LAWRENCE ISLAND, ALASKA



September 2013

#### FIVE-YEAR REVIEW

The United States Army Corps of Engineers (USACE) at Joint Base Elmendorf-Richardson is undergoing a five-year review of remedial actions implemented at the Northeast Cape Formerly Used Defense Site located on St. Lawrence Island, Alaska.

The five-year review is a detailed evaluation of the implementation and performance of the remedy selected to achieve environmental cleanup. The objective of the evaluation is to document if cleanup activities (or "remedies") are protecting people and the environment. If the remedies are not effective, the five-year review makes recommendations to improve protectiveness. This evaluation is required by federal regulations, and the Alaska Department of Environmental Conservation (ADEC) will review the process to ensure completeness and accuracy. This will be the first five-year review for Northeast Cape.

#### SITES INCLUDED IN THE FIVE YEAR REVIEW

Based on the signed decision documents, remedial actions were selected for various sites to address surface soil, subsurface soil, groundwater, and sediment contaminated with polychlorinated biphenyls (PCB), diesel-range organics (DRO), residual-range organics (RRO), arsenic, benzene, and naphthalene. The following table lists the sites and the remedial actions performed at each site.

| Site Number and Name                       | Action                        |
|--|-------------------------------|
| Site 1 Air Strip                           | EX/D                          |
| Site 3 Fuel Pumphouse                      | EX/D                          |
| Site 6 Gravel Pad                          | EX/D                          |
| Site 7 Cargo Beach Road Landfill           | C/LUC                         |
| Site 8 Petroleum, Oil, and Lubricant Spill | MNA/LUC                       |
| Site 9 Housing and Operations Landfill     | C/LUC                         |
| Site 10 Buried Drums                       | EX/D and MNA/LUC <sup>1</sup> |
| Site 11 Fuel Tanks                         | EX/D and MNA/LUC <sup>1</sup> |
| Site 13 Heat and Power Plant               | EX/D and MNA/LUC <sup>1</sup> |

| Site Number and Name               | Action                        |
|------------------------------------|-------------------------------|
| Site 15 Fuel Pipeline              | EX/D and MNA/LUC <sup>1</sup> |
| Site 16 Paint and Dope Storage     | EX/D                          |
| Site 19 Auto Maintenance           | EX/D and MNA/LUC <sup>1</sup> |
| Site 21 Wastewater Tank            | EX/D                          |
| Site 27 Diesel Fuel Pump           | EX/D and MNA/LUC <sup>1</sup> |
| Site 28 Drainage Basin             | EX/D                          |
| Site 29 Suqitughneq River          | Incidental Debris Removal     |
| Site 31 White Alice Communications | EX/D                          |
| Site 32 Lower Tramway              | EX/D                          |

Notes:

EX/D = Excavation with disposal or treatment

MNA/LUC = Monitored natural attenuation with land use controls

C/LUC = Capping with land use controls

<sup>1</sup>Although chemical oxidation was identified as the primary remedy in the decision documents, it was not implemented. The contingency remedy described in the decision documents, excavation of soil and monitored natural attenuation of groundwater, will be implemented.

#### COMMUNITY INVOLVEMENT

The community is encouraged to participate in the review process. Public comments may be provided by responding to a written questionnaire through December 2013, or in person following the December 2013 Restoration Advisory Board public meeting in Savoonga. The questionnaire can be requested from and comments submitted to:

Kevin Maher, Jacobs Engineering Group Inc.  
4300 B Street, Suite 600  
Anchorage, AK 99508  
kevin.maher@jacobs.com (907) 563-3322

#### **ADDITIONAL INFORMATION**

Documents pertaining to background information and the decision documents for Northeast Cape are on file at the following information repository locations:

Alaska Resources Library and Information  
Services, University of Alaska, Anchorage  
3211 Providence Drive  
(907) 786-1871

Savoonga City Hall  
(907) 984-6614

Gambell Sivuqaq Lodge  
(907) 985-5335

Information on the cleanup process is shared with interested persons through periodic public meetings. If you would like to be added to the contact list, contact Valerie Palmer at (907) 753-2578 or [POA-FUDS@usace.army.mil](mailto:POA-FUDS@usace.army.mil)

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#### **US ARMY CORPS OF ENGINEERS**

Alaska District  
P.O. Box 6898 (CEPOA-PM-ESP)  
JBER, AK 99506-0898

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