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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: ECL-115

Gerald Soonagrook Sr., President
Native Village of Gambell
P.O. Box 90
Gambell, Alaska 99742

RE: Government-to-Government Consultation for the NE Cape Air Force Facility,
St. Lawrence Island

Dear President Soonagrook:

We appreciated the opportunity to meet with you in Anchorage on August 8, 2001. This meeting provided a good opportunity for EPA to gain a better understanding of your concerns over the NE Cape site as well as the other Formally Used Defense (FUD) site at Gambell. We found this meeting to play a valuable role in our government-to-government consultation concerning the NE Cape site. The purpose of this letter is to acknowledge many of the concerns you raised and to outline the next steps EPA will take concerning the NE Cape site.

The Villages raised many concerns about the current work being conducted by the U.S. Army Corps of Engineers (ACOE). These concerns include:

- The site clean up at the NE Cape site needs to occur much more quickly. While there are many studies being done on the NE Cape site, little is being done to actually clean up the site.
- The cancer rates among the native people on St. Lawrence are quite high. There is concern that these cancer rates are associated with the NE Cape site.
- There is concern that the food supply is contaminated. Of particular concern is that the fish collected from the Suqi River were contaminated with PCBs, and that they might migrate to other areas and be consumed by marine mammals where the PCBs would bioaccumulate. Marine mammals make up a large part of the native people's diet.
- The Native Villages do not have adequate input to the ACOE's planning for the NE Cape site. Sample plans are almost in their final version when they are made available for comments.
- The technical reports produced by the ACOE are difficult for the Villagers understand. Without that understanding, the Villagers cannot participate fully in discussions w

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- The Restoration Advisory Board (RAB) meetings are quite long and at inconvenient times. It is also questionable if the ACOE is really trying to address concerns.
- Nothing is being done about debris that is underground unless there is a release of hazardous substances, which is difficult to prove.
- There is a FUD site at Gambell which includes a lot of buried debris. Some of this debris is now at the surface and is posing a safety problem. There is also concern that new homes are being built on top of the debris and it is not known if this debris contains hazardous substances.
- The ACOE has been unable to locate unexploded ordinance deposited by the military in Troutman Lake, at Gambell.

In response to these concerns, EPA has agreed to review and evaluate existing reports and plans on the NE Cape site that were prepared by the ACOE. Because of the limits of our authority, our review and evaluation will focus the ACOE's hazardous waste cleanup activities, not debris removal, health evaluations or petroleum contamination. Once this review is complete, EPA will provide a written evaluation to the Villages of Gambell and Savoonga. It is estimated that this will take two to three months. EPA will discuss the ongoing cleanup activities with the ACOE to determine the schedule for site clean up. EPA will also inquire with the Alaska Department of Environmental Conservation (ADEC), the current agency overseeing the ACOE, to learn their perspective on the ACOE's activities at the NE Cape site.

EPA has reevaluated the NE Cape site using the Hazard Ranking System (HRS). While the numerical score did indicate that this site could qualify for the NPL, EPA will need to consider additional factors to determine whether placement on the NPL is the best approach for cleaning up the site. For the NE Cape site, it will be necessary to determine if EPA involvement will improve the current activities at the site and promote a quicker cleanup. As was mentioned during the meeting, even if EPA were to list the site on the NPL, EPA could not provide additional funding for site investigation and cleanup. The ACOE must continue to provide the funding for cleanup. The effect of NPL listing is that EPA, with ADEC, would oversee the ACOE's cleanup work at NE Cape.

As a federal agency, like EPA, the ACOE also has a unique legal relationship with Tribal governments. While EPA is encouraged that the Villages of Gambell and Savoonga have had the opportunity to interact with the ACOE through the RAB meetings, we encourage the Villages to pursue formal Government to Government Consultations with the ACOE.

Again, we appreciated the opportunity to meet with you. Should you have any additional questions or concerns regarding consultation or the site please do not hesitate to call me at (206) 553-1234, or Michelle Pirzadeh, Associate Director of the Office of Environmental Cleanup, at (206) 553-1272. Joanne LaBaw, the staff person assigned to the site, can be reached at (206) 553-2594.

Sincerely,

Ron Kreizenbeck
Deputy Regional Administrator

cc: Scott Sufficool, EPA
Marcia Combes, EPA, Alaska Operations Office
Richard Porter, EPA Alaska Operations Office
Jerald M. Reichlin, Fortier & Mikko