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1700  
Aug 9 1995

In-Active Installation Section

Mr. Clint Adler  
State of Alaska  
Department of Environmental  
Conservation  
610 University Avenue  
Fairbanks, Alaska 99709-3643

Dear Mr. Adler:

The purpose of this letter is to confirm my understanding of our August 4, 1995, meeting discussing the Investigative-Derived Waste (IDW) Handling Plan for Gambell and Northeast Cape, St. Lawrence Island, Alaska. Present at the meeting were you and John Halverson of the Alaska Department of Environmental Conservation and myself.

Based on the discussions during that meeting the IDW Handling Plan will be changed to leave on site, in the present supersacks, any soil with diesel range organics (DRO) over the calculated risk based concentration of 8,760 mg/kg.

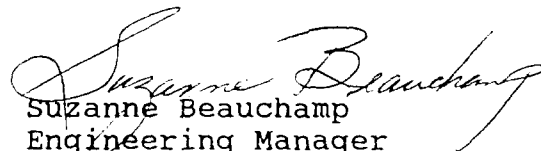
In summary the following actions will be taken at each site. At Gambell there were twenty-three (23) supersacks left at ten different sites. Twenty (20) of the twenty-three supersacks of cuttings have DRO results less than the risk based concentration and maximum total lead concentrations less than 100 mg/kg and these cuttings will be spread adjacent to the boring and at least 100 feet from surface water or drinking water well points. The one (1) supersack with a total lead concentration 117 mg/kg will be sampled and the EPA toxicity characteristic leaching procedure (TCLP) will be performed to determine if the cuttings meet the definition of a hazardous waste. If the contents are determined to be a hazardous waste the cuttings will be packaged and sent off-site to an approved disposal facility. If the cuttings do not meet the definition of a hazardous waste then the cuttings will be spread adjacent to the boring. The two (2) supersacks of cuttings in the Gambell area which do not have any analytical results for DRO will be tested for DRO. If the cuttings do not exceed the risk based concentration for DRO the cuttings will be spread on-site; otherwise the cuttings will be left in the supersack until the appropriate remedial activity has been determined.

At Northeast Cape there were twenty-one (21) supersacks which were left at eleven different sites. Sixteen (16) of the

twenty-one supersacks of cuttings have DRO results less than the risk based concentration and maximum total lead concentrations less than 100 mg/kg; these cuttings will be spread adjacent to the boring and at least 100 feet from surface water or drinking water well points. The one (1) supersack with a total lead concentration 157 mg/kg will be sampled and the EPA toxicity characteristic leaching procedure (TCLP) will be performed to determine if the cuttings meet the definition of a hazardous waste. If the contents are determined to be a hazardous waste the cuttings will be packaged and sent off-site to an approved disposal facility. If the cuttings do not meet the definition of a hazardous waste then the cuttings will be spread adjacent to the boring. The remaining four (4) supersacks, located at Sites 11, 19, 27, and 13, have maximum DRO concentrations which exceed the risk based concentration level for the site; these cuttings will remain in the supersacks on site until the appropriate remedial activity has been determined.

The Alaska District's contractor is expected to be on-site performing the IDW handling work about the third week of August. Based on our discussions of August 4, 1995, it is my understanding that the Alaska Department of Environmental Conservation has no objections to the proposed method of handling investigative-derived waste summarized above. If you have any other comments or questions about the IDW Handling plan, please contact me at 753-5656.

Sincerely,

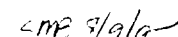
  
Suzanne Beauchamp  
Engineering Manager

cc John Halverson, ADEC-Anchorage

CONCUR:

Rowe 

 Volz

  
BEAUCHAMP/bfk/X1656/SUZANNE/ADECIDW2.LTR  
9 August 1995