

**St. George and St. Paul
Restoration Advisory Board (RAB) Meeting**

Date: March 4, 2004
Time: 8:30am to 3:00 pm

Location: Aleutian/Pribilof Islands Association Board Room
201 East 3rd Avenue, Anchorage

Agenda

Co-Chairs: Mr. Jason Bourdukofsky and Mr. Bernie Denno (NOAA)

- 8:30-8:40 Welcome and Introductions
- Circulate Sign-in Sheet
- 8:40-9:00 Distribution of RAB Minutes for Review and Approval
- June 2003
 - November 2004, St. George
 - November 2004, St. Paul
- 9:00-9:10 Modifications to Agenda
- 9:10-9:30 Review of Membership and Membership Guidelines
- 9:30-10:30 Additional Results of 2003 Cleanup Activities Since last RAB (NOAA Staff)
- St. George
 - Ballfield
 - St. Paul
 - Blubber Dump
 - Vehicle Boneyard
 - AST Saddles
 - Cascade Building
 - Machine Shop
 - Diesel Tank Farm
 - Landfill
- 10:30-10:50 Fall 2003 Groundwater Sampling Results
- St. George
 - St. Paul
- 10:50-11:10 St. Paul Critical Water Management Area
- 11:10-11:45 PCS Disposal
- St. George
 - St. Paul
- 11:45-12:00 Regional Federal Sites Restoration (P. Zavadil)
- 12:00-1:00 Break for Lunch
- 1:00-1:15 St. Paul: Coast Guard groundwater monitoring data, future monitoring plans, & plans for HVE system

- 1:15-2:00 2004 Field Activities
- St. George
 - St. Paul
- 2:00-2:30 Source(s) of Clean Backfill
- 2:30- 3:00 Public Comments/2004 Meeting Schedule/Adjourn

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Restoration Advisory Board (RAB) Meeting
Thursday, March 4, 2004**

Aleutian/Pribilof Islands Association Board Room
201 East 3rd Avenue, Anchorage

Meeting Notes*

**Note: All responses to questions or comments set out in these notes are provided by NOAA representatives, unless stated otherwise in conjunction with the particular response.*

Co-Chairs: Mr. Jason Bourdukofsky, Pribilof Islands; Mr. Bernie Denno, NOAA.

Call to order: The meeting was called to order at 8:40 a.m.

Participants:

Jason Bourdukofsky, St. Paul Island, At Large
Andrew Malavansky, St. George Traditional Council (by phone)
Gregory McGlashan, St. George Traditional Council (by phone)
Anthony B. Merculief, St. George Traditional Council (by phone)
Max Malavansky, Jr, St. George Traditional Council (by phone)
John R. Merculief, City Manager, City of St. Paul
Max Malavansky, City Administrator, City of St. George
Mark Merculief, Sr., St. George Chadux Corporation (Chadux)
Laurence Lestenkof, St. George Tanaq Corporation (Tanaq)
Andronik Kashevarof, Jr., Tanaq
Leland Little, Tanaq
Ron Philemonoff, Tanadgusix Corporation (TDX)
Victor Merculief, Sr., TDX
Anthony Philemonoff, TDX
William N. Arterburn, Bering Sea Ecotech, Inc. (BSE)
Melvin Smith (for Elary Gromoff), The Aleut Corporation
Chris Riggio, Aleutian/Pribilof Islands Association (APIA)
Mahri Lowinger, APIA
Louis Howard, Alaska Department of Environmental Conservation (ADEC)
Bob Blankenburg, ADEC
Marti Early, ADEC
Lindsay Smith, ADEC
Mark Ridgway, US Coast Guard, Civil Engineering Unit, Juneau
Heather K. Vick, Tetra Tech EM, Inc.
David Ausman, Polarconsult-Alaska, Inc.
Bernie Denno, NOAA
John Lindsay, NOAA
Craig O'Connor, NOAA
Greg Gervais, NOAA
Paula Souik, NOAA
Nir Barnea, NOAA
David B. Winandy, NOAA
James P. Wright, NOAA
Jim Malchow, NOAA
Laura Murray, NOAA
Thanh M. Trinh, NOAA
Ellen Clark, NOAA
Richard Legatski, NOAA

8:40 - Welcome and Introductions

- Potential dates for remaining 2004 RAB meetings: weeks of June 14-18 or 21-25, September 13-17 or 20-24, and December 6-10 or 13-17.
- Bernie Denno is the new NOAA co-chair, and he also will be working with the island communities long term on monitoring of groundwater wells.
- Minutes distributed from meetings February 2003, St. George and St. Paul; June 2003, St. Paul; November 2003, St. George; and November 2003, St. Paul, for review and approval at end of this meeting.
- Modifications to the agenda were invited; none were submitted.
- Questions should be e-mailed to Richard Legatski (*Richard.Legatski@noaa.gov*), who is NOAA's RAB Coordinator. He will forward questions to the appropriate NOAA office.
- Membership and membership guidelines were discussed briefly. Anthony Philemonof stated he is a voting member when Victor Mercurief is not present.

9:30 - Results of 2003 Cleanup Activities

St. George

Ball Field: work summarized by David Winandy, NOAA.

St. Paul

Blubber Dump: work summarized by Nir Barnea, NOAA.

- Question: Were the samples all taken at the same depth? Answer: Samples were all taken at 6 inches. The State has different requirements for an Enhanced Thermal Conduction (ETC) site versus some other TPA sites. NOAA conducted the sampling per State regulations.

St. Paul Vehicle Boneyard: work summarized by Jim Wright, NOAA.

- Question: Vehicles that were buried there were not removed. What is the state's opinion on this issue? Answer: The state feels that the vehicles are sufficiently contained within the buried area.
- Question: Did NOAA do sampling of scrap metal? Answer: Yes, NOAA was looking for debris with this testing. State regulations say solid waste can be left in place with a minimum 2-foot cap. NOAA complied with this state regulation.
- Question: From the State point of view would there be any restrictions placed on the owner of this land? Answer: This area is being classified as a landfill.
- Question: Is it allowable under ANSCA for this to be classified as a landfill? Answer: NOAA will look into this

AST Saddles: work summarized by Greg Gervais, NOAA.

- Question: Did you test for contamination to the east? Answer: NOAA excavated to the road and found the area to be clean, with confirmation samples.
- Question: Did you do any testing north of the area? Answer: Due to steep hill and houses above the site, we were not able to dig anymore. NOAA contractors previously sampled the area and they came up clean.
- Question: Are there any plans to re-vegetate this area? Answer: We have not yet discussed that. If there is an erosion issue, the City would be welcome to raise it with NOAA and we could work something out.

Cascade Building: work summarized by Greg Gervais, NOAA.

- Question: This area has been cleaned twice. Are you sure that you have addressed the source and not the symptoms? Answer: We understand that the storage tank was previously removed and the contamination levels were still high there when we finished last time. Back then the scope of work was to remove the UST. This time we got in there and chased the contamination through all the utility lines and took confirmation samples.

- Question: Is NOAA planning on coming back in 2 years to see if it is clean? ADEC answer: The groundwater will be monitored in the future with the wells.
- Question: What about the Cascade building itself? Answer: Sampling in the inside shows some contamination, but we are not going to be digging anything up because the building was constructed in such a way that there are cross-ties. Any digging could be detrimental to the structure of the building. There may be other contributors to the cleanup as others are using the site for storage of equipment.

Machine Shop: work summarized by Greg Gervais, NOAA.

- Question: In the event that the future owner was to remove the building, who would be responsible for cleaning up the property? What are the future liabilities involved?
Answer: That will be discussed in the TOPA discussions.

Diesel Tank Farm: work summarized by Nir Barnea, NOAA.

Landfill: work summarized by Jim Wright, NOAA.

- Question: What about harmful emissions from burning of materials? ADEC answer: A good burn box burns hot enough to avoid harmful emissions. The State will look into this issue.

Miscellaneous Questions:

- Question: Some PCS came from Polovina stockpile area. Was the footprint clean?
Answer: Polovina stockpile PCS material footprint came back clean. The report is going to be made available. The report will be sent to the state for a NFRAP.

10:30 - Fall 2003 Groundwater Sampling Results

St. George – Sampling results discussed by Jim Malchow, NOAA.

- Question: In previous discussions there were some discrepancies with how much product is in there. Has this stabilized? Answer: The product quantity varies with the tides.
- Question: Are you seeking the “10 times” rule on St. George? Why different from St. Paul? Answer: The City is not planning to use this area for drinking water. The free product is consolidated and we are going to address it.
- Question: Have you dug down to free product on St. George? Answer: It is too deep to excavate down to.

St. Paul – Sampling results discussed by Jim Wright, NOAA.

- Question: Is there free product in the salt-water wells on St. Paul? Answer: There was some paint or “goo” that was taken out of the wells. There is no free product in the wells.

Note: As requested at the RAB meeting, a depiction of groundwater monitoring well locations is attached to these minutes.

10:50 - St. Paul Critical Water Management Area (CWMA) – John Lindsay, NOAA, discussed the CWMA proposal.

A 10x rule determination was requested, but TDX did not want the 10x rule extended up to Ice House Lake. However, TDX does want the 10x rule to cover the areas from the Village up to the By-Product Site near government staff quarters. NOAA spoke with ADEC about the issue. The 10x rule only applies to groundwater, not surface water. The State did not feel that it was appropriate for NOAA to request the CWMA that far up to Ice House Lake. TDX wanted to expand the 10x rule within the Village area.

- Question: What if someone wanted to process sea urchins that would require salt water?
Answer: The CWMA will not apply to surface water, and NOAA and the State will hold a public meeting to explain application of the CWMA.
- Comment: The State is amenable to have the 10x rule match the CWMA, but the City has to request it. There was discussion of holding a workshop in the April- May time frame to educate the community prior to the 30 day comment period and public hearings.
- Comment: The only other groundwater contamination is at Ice House Lake. The State feels this is not a threat, and that it should be monitored to make sure that it does not expand.

11:10 – PCS Disposal – John Lindsay, NOAA, discussed issues related to PCS disposal.

Originally NOAA wanted to remove PCS from the islands to treat it, but the communities objected. NOAA then explored the use of ETC systems to clean the PCS, but the cost of treating the soils increased and was about \$200 per cubic yard as opposed to much less in Anchorage. The amount of PCS was underestimated originally and the total amount to clean has increased. There is not enough money to treat high volumes of soil under the current authorization and still conduct the rest of the cleanup. To save money NOAA decided to look at the option of using a monofill. The communities were not content with this approach so NOAA examined the cost of any other options that were potentially feasible, including land spreading, land-farming, bio-piles, monofill, rotary kiln, encapsulation in asphalt, recycling in asphalt, slurry phase bioreactor, soil washing, and off-island landfill disposal.

Note: The final Mitretek Report evaluating PCS disposal and treatment options was recently completed and will be circulated to RAB members.

- Question: For the other cleanup options, is there a target cleanup level? ADEC answer: Model runs would be used to determine cleanup levels.
- Coast Guard Comment: Bio-piles have not worked for them to treat PCS. It is a risk and you don't know if it works until you are several years down the road.
- Question: How much money do you have allocated for each island for cleanup?
Answer: We don't want to address that because it could cause competition between the islands.
- Question: When do you expect to have an answer on remediation options? Answer: At the end of the month when we meet to discuss St. Paul Transfer of Property Agreement (TOPA) issues.
- Question: What is your preferred alternative for PCS? Answer: Monofills, but the PPO staff is not making the decision, just the recommendation. NOAA headquarters will make the final decision on how to treat or dispose of PCS, and at this time the options are still being evaluated.

11:45 – Regional Federal Sites Restoration – Chris Riggio with APIA discussed this program (on behalf of Phil Zavadil, who was unable to attend the RAB).

A non-profit group under the direction of the 13 Aleut Tribes is working to take a regional approach to federal site restoration. Concerns include how contaminants enter the environment and food chain, and that there are many sites and little money to address cleanup issues. In 1999 a Tribal Policy for Restoration of Federal sites was drafted and is in the process of being finalized. The goal is to look at sites in the region and give the tribes the tools to work with their organizations and delegation. An inventory of Federal Sites is also being created as a resource for tribes to use. A restoration oversight committee with members from each of the 13 tribes is

working to develop a prioritization list from the tribal perspective. The program seeks to speak with one united tribal voice, and not to take away tribal sovereignty.

- Question: To what extent do you include the corporations, as the major landholders? C. Riggio answer: Our next step is to finish the draft policy, then work with the corporations to find common ground between the groups.
- TDX Comment: Corporations should be included in the policy development as the corporations are the landholders.
- Comment: Prioritization should first focus on populated areas as opposed to the uninhabited ones. C. Riggio response: Habitation issues come up often as a way of prioritization by federal agencies. However, contaminants also can enter the food chain in uninhabited areas.
- Comment: A potential St. Paul Formerly Used Defense Sites (FUDS) Program site (Telegraph Hill) is above a water source.

[Break for lunch.]

1:00 – St. Paul: Coast Guard Groundwater Monitoring Data, Future Monitoring Plans, and Plans for the HVE System – Mark Ridgway, US Coast Guard, summarized activities of the Coast Guard’s groundwater cleanup and monitoring program on St. Paul.

1:15 – 2004 Field Activities – John Lindsay summarized 2004 field activity plans.

St. George: NOAA needs to begin work on the free product to get a handle on the quantity and a better understanding of the issue. The ocean front site has been moved off this year’s priority list for St. George, but depending how other projects go, we may be able to begin work there.

- Question: How do you characterize the free product issue, the volume? What is the game plan for this summer? Answer: The game plan is to conduct a pilot project to see how best to extract the free product from the ground. We are going to have to bring on a contractor who has the expertise in this area. We will need to put some money aside to see how the mechanics of this removal will work. We need to find out this year, because next year will be too late.
- Question: What is the quantity of fuel on St. George? Answer: 30,000 gallons at TPA-8 and 5,000- 17,000 gallons at TPA-1. Skimming won’t get you to the levels that you can achieve with other systems, but may be a useful first step.
- Question: Could this take 5 years? Answer: We’re not sure. The Coast Guard had 3-5 years

St. Paul: We expect salt water well closure in April. Cleanup work will take place at Lukanin Bay, the Diesel Seep, Ice House Lake, and the Blubber Dump PCS. The majority of cleanup work on St. Paul could be nearly complete this year, except for capping the St. Paul Landfill, and completing PCS treatment or monofilling.

- Question: Is Telegraph hill on the list? Answer: It is number 37, a FUD site.
- Question: How did Windmill wells area become a FUD site? Answer: NOAA found information that the Navy installed these wells, which need to be capped.
- Question: Why is the Radio Complex listed as a FUD site? Answer: A person from DOD looked at the site last year and declared it to be a FUD site. They state there is no problem, but if there is, it is the Navy’s issue.
- Question: What about a cover for Tract 42? Have you checked to see if the materials are running off? Answer: We have not checked this lately.

2:00 – Sources of Clean Backfill – John Lindsay, NOAA, addressed this topic.

There is not enough backfill material (sand and scoria) to place in excavations, especially on St. George. If we don't get some guarantee of availability of backfill material then we will not be able to begin work, since we don't want to make holes we are unable to fill. We are not sure why material that has been available in the past, is now in short supply.

- Comment: Perhaps you should talk with the ACOE about the sand that they remove from the St. Paul Harbor Improvement Project. Answer: We are trying to coordinate NOAA diesel seep work with the ACOE. If this occurs then we could use those materials. If not, then would have to find our own source of materials.

2:05 – St. George Traditional Council Issues – Discussion by phone with Greg McGlashan, Anthony Mercurief, Andrew Malavansky, and Max Malavansky, Jr.

- Electrical and plumbing shop: Council wants NOAA to remove asbestos, pipe fittings. Response: The property was transferred in the 1980s, and ownership includes an obligation for its upkeep. Upkeep is not NOAA's responsibility.
- Comment: NOAA's responsibility is not just to clean up contamination, but to address hazards too. Response: NOAA realizes this. However, the property belongs to St. George. We will see what we are able to do.
- Concrete docks: The docks have deteriorated over the years. Rebar is sticking out, and is a threat to navigation and to children that play in the area. Response: The property was transferred in the 1980s. Ownership of the structure includes an obligation for its upkeep. Upkeep is not NOAA's responsibility.
- Decontamination of PCS hauling trucks: The past few years when NOAA is moving contaminated soil, there has been no decontamination for the trucks. There is decontamination for the crew, but not for the trucks, which carry the dirt into town. This poses a threat to everyone including the children living in town. The trucks have been leaving contaminated mud on the roads, especially at the PCS long-term stockpile. Response: As much as possible the trucks are kept outside the perimeter of the contaminated site. They are loaded with an excavator so the only area of the truck affected is the bed of the truck. We have a decontamination area where vehicles and equipment are decontaminated when switching from dirty to clean material, and we keep the trucks outside of the contamination. Because the island and site access roads are all unpaved, the trucks do get mud on their tires. At the PCS long-term stockpile, about 40 cubic yards of clean scoria were used to eliminate puddles and subsequent mud tracking onto the gravel road. NOAA will increase monitoring and do a better job of ensuring contamination is not tracked.
- Comment: We want a more stringent equipment decontamination plan. Response: We can brush dirt and mud off of the trucks if they do get into the contaminated areas, however, the trucks generally do not go there.
- PCS stockpile: This is too close to the seal rookeries and the road. Noise from the equipment seems to be disturbing the seals in the rookeries, and we are concerned that there is contamination drifting onto the berry fields. Response: We will cover the pile in the future with a temporary cover.
- Comment: It appears that the seal population has declined. The animals scurry when the equipment is started. Response: St. George should keep records of such incidents, and provide any documentation to NOAA.
- Question: How will you dispose of PCS this year? Answer: We will stockpile the PCS this year.

- Question: Is there a deadline for what you will do with the PCS? Answer: The money runs out at the end of FY2005 (September 30, 2005). We will continue to listen to the RAB, but the final decision is NOAA's and NOAA needs to get approval from the State.
- Comment: There are only two real alternatives; treat the PCS or take it off-island. Response: We have limited funds to address this issue. We cannot request money beyond the current authorization.
- Coast Guard Station: Has it been determined who is responsible for cleaning it up? NOAA response: We have walked around there, but this would not be an issue for NOAA to address. Coast Guard response: There was reference to an old LORAN station above the cemetery on St. George. An environmental due diligence audit was conducted in the summer of 2003. That report has not been finalized, but Mark Ridgway will make sure that it is circulated to the RAB. The report will most likely show that it is a FUDS issue, beyond the purview of the Coast Guard. The FUDS program went there in 1995 and removed debris.
- Comment: An ACOE representative should be invited to future RAB meetings. Response: NOAA will extend an invitation to the ACOE Alaska District.

2:40 – Review of Minutes of Previous RAB Meetings: The Co-chairs ask for review and approval of the minutes from the following RAB meetings, all of which were approved by voice vote without discussion:

- February 13, 2003 Joint Meeting
- June 9, 2003 - St. Paul
- November 1, 2003 - St. George
- November 4, 2003 - St. Paul

2:45 – Public Comments/Next Meeting:

- Public comments were invited, but none were offered.
- The next meetings will be on the islands in June 2004, and a suggested schedule will be circulated with the draft minutes of this meeting. If anyone is aware of June dates that may not be workable, please send an email to Richard.Legatski@noaa.gov.
- Comment: We are an advisory board who comes here and tells NOAA and the State what we would like to see done. It is up to them to take our comments into account. Response: NOAA seeks to avoid harming anyone or anything. If the State thinks that NOAA is causing any potential harm to the community then NOAA wants to hear those concerns and address them.
- Comment: There has been some reticence by NOAA to show how money was allocated between the islands. We would like to see at the next meeting an allocation of how the past moneys were spent, and the background on where we have been. Please add this to the agenda for the next meeting. Response: This will be addressed at the next meeting. For the currently available funds, salaries account for \$870K and contracts account for \$5.6 M.

The Meeting Adjourned at 2:45pm