

STATE OF ALASKA

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

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March 282000

Mr. John Lindsay
Pribilof Island Project Manager
U.S. Department of Commerce, NOAA
National Ocean Service
Office of Response and Restoration
7600 Sand Point Way, NE BIN C15700
Seattle, Washington 98 115-0070

RECEIVED

APR 3 , 2000

RE: Draft Site Characterization Report for Oil Drum Dump Site Two Party Agreement Site No. 1 Pribilof Islands Site Restoration St. Paul Island, Alaska Contract # 50WCNA906018 dated February 28, 2000

Dear Mr. Lindsay:

The Department of Environmental Conservation (DEC) has received and reviewed the above document on March 1, 2000. Below are DEC's comments.

6.2.1 Residual Sample Results Page 19

The text refers to the Risk Assessment Procedure Manual (effective Nov. 24, 1998) for defining soil within 2 feet of the ground surface as susceptible to disturbance by recreational use. Section 3.2.2.5 of the manual states that *the risk assessment workplan* should identify soil exposure areas for the various land uses. The manual does not have a specific default value for defining soil disturbed by recreational use.

There appears to be a discrepancy between 18 AAC 75(j)(2) states that cleanup must be achieved in the subsurface soil to a depth of at least 15 feet and section 3.2.2.5 of the manual. Section 3.2.2.5 states that for all land uses, ADEC will generally use a default value 10 feet to define subsurface soil to which residents will have a reasonable potential to be exposed (ingestion, dermal contact, and inhalation). Until the issue can be corrected in the manual at a later date, DEC will require NOAA to meet cleanup levels which prevent human exposure from ingestion or inhalation of a volatile hazardous substance in the surface soil and the subsurface soil to a depth of *at least 15 feet*. Fifteen feet is the depth above which DEC considers it is reasonably likely for affected soils to be excavated and brought to the surface during the installation of septic systems, utilities, construction of basements, etc.

The soil cleanup levels provided under method one and method two apply at this site unless DEC approves an alternative site-specific cleanup level that NOAA has proposed under method three ~~through~~ ~~method four~~ ~~methods~~ that utilize method three/method four or do not allow for unrestricted use or which have institutional controls placed on them, DEC will require NOAA to obtain the consent of each *landowner* who is affected by the contamination at the site (see 18 AAC 75.340(e)(3)(D), 18 AAC 75.340(f)(2) and 18 AAC 75.375(a)).

7.0 Conclusions Page 21

The text states that the cleanup level for residual range organics (RRO) exceeds the respective site-specific Method Two cleanup levels of 11,000 mg/kg. However, since the cleanup criteria for RRO listed in Table B2 for ingestion is more stringent, DEC will require that this lower cleanup level be used for the RRO contamination at the site.

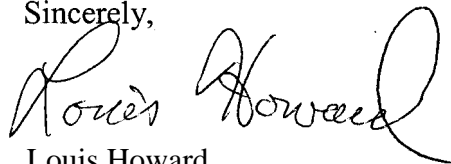
8.0 Recommendations Page 22

The text states that the groundwater contamination will be expected to attenuate by a variety of physicochemical processes. To demonstrate that these processes are-actually occurring, DEC requests NOAA submit a workplan for DEC review and approval to install and sample groundwater monitoring wells at the site. NOAA will need to determine the extent of the groundwater contamination at the site, which is above the Table C value for the diesel range organics at sample location 01GW18-130.

With regards to the formerly used defense sites (FUDs) issues at this site, DEC will not require NOAA to pursue cleanup at the site at this time pending the outcome of a future joint meeting with the Corps of Engineers. If the Corps of Engineers determines that this site is not eligible for funding under the FUDs cleanup program, then DEC will be requesting NOAA address the contamination at the site.

If you have any questions regarding this letter, please call me at (907) 269-7552.

Sincerely,



Louis Howard
Project Manager

cc: John Halverson, ADEC Anchorage
Jennifer Roberts, ADEC Anchorage
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