### Pribilof Islands Restoration Advisory Board Meeting April 4, 2002 Westcoast International Inn, Anchorage, Alaska

### Meeting Agenda

8:00 a.m 8:20 a.m.	Opening and Introductions	RAB Co-Chairs
8:20 a.m 8:30 a.m.	Public Comments	
8:30 a.m 8:45 a.m.	Approval of Previous Meeting Minutes	RAB
8:45 a.m 9:00 a.m.	New Hire Status	NOAA
9:00 a.m 9:15 a.m.	Economic Development	EDA
9:15 a.m 9:30 a.m.	Coast Guard Status Report	USCG
9:30 a.m 9:45 a.m.	Landfill Planning and Design Grant	ADEC
9:45 a.m 10:00 a.m.	St. Paul Landfill Status - Community Use of Landfill - Landfill Closure Design	NOAA Polarconsult
10:00 a.m 10:15 a.m.	Break	
10:15 a.m 11:00 a.m.	St. Paul Site List Update	NOAA
11:00 a.m 11:15 a.m.	St. Paul Tract 46 "Hot Spots"	NOAA
11:15 a.m 12:00 p.m.	Priority Projects on St. Paul	NOAA
12:00 p.m 1:00 p.m.	Lunch	
1:00 p.m 2:00 p.m.	Priority Project on St. Paul	NOAA
2:00 p.m 2:15 p.m.	St. George Site List Update	NOAA
2:15 p.m 2:30 p.m	Break	
2:30 p.m 4:00 p.m.	Priority Projects on St. George - Village Groundwater - CAP Former Gas Tank Farm	NOAA TTEMI Polarconsult
4:00 p.m 4:15 p.m.	Applying the 10x Rule	NOAA
4:15 p.m 4:30 p.m.	GPS Activities During 2002 Field Session	NOAA
4:30 p.m 5:00 p.m.	National Historic Preservation Act	Video
5:00 p.m 5:15 p.m.	Public Comments/Adjourn	



550 West Seventh Avenue, Suite 1780 Anchorage, Alaska 99501

### **Economic Development Partnerships**

...Begin Locally

Economic Development Districts and Alaska Regional Development Organizations represent the bringing together of Private and Public interests to build consensus, articulate an Economic Development Strategy, and invest in the future of their communities.

These market-based investments should lead to long-term private sector jobs, an educated and skilled workforce, diversification of industry and business, and strengthened economies and lives for the people of their communities. Working together, local and regional interests combine their talents to better draw upon local, state, and federal resources.

Partnerships improve the ability to meet training and technical assistance needs of communities, thereby improving the effectiveness of local and regional strategies and increasing the likelihood of successful development efforts. The EDA staff in Anchorage, Seattle and Headquarters appreciate your local efforts. Thank you!

Bernhard Richert, Director Alaska Field Office

Ton Para J

Program Specialist

Wesley Campbell
Civil Engineer

Joyce Sullivan
Secretary



### UNITED STATES DEPARTMENT OF COMMERCE ECONOMIC DEVELOPMENT ADMINISTRATION

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### **EDA PROGRAM SCOPING AND PROCESS**

The Economic Development Administration (EDA) is interested in helping to create or retain long-term, private sector jobs. EDA tends to use a "Discovery" form of investment selection rather than of formal competition. EDA likes to select investments which will help those areas which are suffering the highest degree of economic distress, as is shown by high unemployment, low per capita income, out-migration and due to economic disasters, but in areas where an investment will work. Grants go to Public Bodies such as Tribal or municipal governments, and some categories of non-profit organizations are also eligible applicants.

Eligibility for assistance requires that a Comprehensive Economic Development Strategy (CEDS) is in place. Usually a public-private sector partnership decides: this is where we are; this is where we want to go; and this is how we are going to get there. A guide to CEDS is available on EDA's website at <a href="https://www.doc.gov/eda/">www.doc.gov/eda/</a>, look under "Planning" and "Planning for Economic Development."

In general, communities must have an average unemployment for the previous 24-month period of at least one percentage point above the national average for that period. Even higher unemployment rate may permit a higher percentage of Federal Grant Dollars. Low per capita income or out-migration may also help establish eligibility.

EDA uses a two-step application process. First, discuss the potential request with local EDA staff to determine if the investment is legal and sounds like a deal EDA can do. Next, a Pre-Application is submitted to the Anchorage Office where it is reviewed and forwarded to the Regional Office. If the Seattle Regional Office agrees with our recommendation, the applicant is advised or "authorized" to submit the actual, detailed Application.

At the Pre-Application stage, the applicant needs to know what the investment is expected to do and how much it will cost. EDA's Anchorage staff and other parties, will be happy to provide suggestions - even in the fairly early stages of defining the investment.

Special considerations in defining the investment include:

- How many long-term, private sector jobs are created or saved by the investment? (A rule-of-thumb standard is that for every \$10,000 of Federal Grant Funding there should be created or saved one year-round, full-time private sector job.) EDA does not really always expect this standard to be met; but it is a target or "standard."
- The immediate construction jobs, while extremely important, do not carry the same weight as the long-term jobs.
- Will the facility or program work?

Is a feasibility study needed?

Should business, operating, administrative or construction plans be developed?

- Is the investment sustainable?
- Are there historical or environmental issues which must be addressed?
- Are matching funds available?

Are all financial resources being maximized?

• Is training part of the investment?

If so, is this aspect being developed in a timely way?

Will trained individuals have jobs upon completion of training?

Are employers identified?

Who is going to own and operate the project?

Are agreements needed?

Are operation and maintenance covered?

• Is there site control?

Who owns the property?

Is a lease required?

 A survey of interest or skills within the community may be desirable for certain proposed investments such as multi-purpose or training facilities.



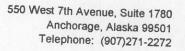
Amended Investment Policy Guidelines were received in a memorandum from Dr. David A. Sampson, Assistant Secretary for Economic Development, effective October 1, 2001.

The Investment Priorities are the criteria EDA will be using to evaluate proposed investments.

### **INVESTMENT PRIORITIES:**

EDA's due diligence process will evaluate proposed investments based on current statutory and regulatory requirements including consideration of whether:

- a. The proposed investments are market based.
- b. The proposed investments are proactive in nature and scope.
- c. The proposed investments look beyond the immediate economic horizon, anticipate economic changes, and diversify the local and regional economy.
- d. The proposed investments maximize the attraction of private sector and would not otherwise come to fruition absent EDA's investment.
- e. The proposed investments have a high probability of success and include:
  - A high level of local, state, and private matching funds;
  - A high degree of commitment of local political "capital" by elected officials; and
  - A high level of commitment of human resources talent to project outcomes.
- f. The proposed investments result in an environment where higher paying lucrative jobs are created.
- g. The proposed investments maximize Return on Taxpayer Investment.





### **FY2001 FUNDING RECAP**

### ALASKA EDA INVESTMENTS - FY2001

APPLICANT	(AD /5071171			
Seldovia Native Assoc/City of Seldovia	INVESTMENT NO	" TO I MEN	EDA \$	TOTAL \$
Seward, City of	07-01-04930	Commercial/Visitor/Dock Develop.	2,300,000	2,500,000
	07-01-05009	Municipal Small Boat Harbor	1,300,000	1,715,000
PLANNING GRANTS			3,600,000	4,215,000
Bristol Bay Native Association	07-84-05093			
Tanana Chiefs Conference	07-84-04948	Indian Continuation Planning Grant	59,000	59,000
Tlingit/Haida Tribes	07-84-04947	Indian Continuation Planning Grant	59,000	59,000
SW Alaska Municipal Conference	07-83-05077	Indian Continuation Planning Grant	53,000	53,000
Kenai Peninsula Borough EDD	07-83-05068	District Continuation Planning Grant	59,000	78,667
Kawerak, Inc.	07-84-05066	District Continuation Planning Grant	59,000	78,667
Anchorage, Municipality of	07-87-05128	Indian Continuation Planning Grant	59,000	59,000
	0. 0. 00120	Development of CEDS	60,000	120,000
TECHNICAL ASSISTANCE			408,000	507,334
Alaska, University of	07-66-05054	University Contex Continue		
AK State Council on the Arts	07-06-05012	University Center Continuation Local Technical Assistance Grant	110,000	146,667
		Local Technical Assistance Grant	50,000	66,667
ECONOMIC ADJUSTMENT ASSISTANCE			160,000	213,334
Kenai, City of	07-79-04943	Water/Sewer Study		
Alaska, University of	07-69-04961	Education for planning	25,000	50,000
		Education for planning	35,000	48,810
DEFENSE ADJUSTMENT ASSISTANCE			60,000	98,810
Adak Reuse Corporation	07-49-05052	Base Operations & Maintenance		
City of Delta Junction	07-49-05148	Community Facility Maintenance	6,775,062	6,852,372
		ooming racinty Maintenance	997,800	110,867
TIMBER IMPACTED COMMUNITIES			7,772,862	6,963,239
Haines, City of	07-79-04967	Popovete Lutale David		
Craig, City of	07-79-05135	Renovate Lutak Dock Purchase of Vessel Haul-out Trailer	2,000,000	2,500,000
			75,000	100,000
NORTON SOUND DISASTER INVESTM	IENTS - EV2001		2,075,000	2,600,000
Native Village of Wales	07-79-54004			
Native Village of Savoonga	07-79-54004	Multi-purpose Community Center Bldg.	1,000,000	1,000,000
King Island (Nome)	07-79-54008	Multi-purpose Community Center Bldg.	1,000,000	1,000,000
Golovin (Chignik Eskimo Community)	07-79-54005	Community Center Bldg.	1,000,000	1,000,000
Stebbins (IRA)	07-79-54005	Multi-purpose Community Center Bldg.	990,000	990,000
White Mountain (Native Village)	07-79-54002	Multi-purpose Community Center Bldg.	1,000,000	1,000,000
Kawerak, Inc.(for 8 communities)	07-79-54007	Multi-purpose Community Center Bldg.	850,000	850,000
City of Elim	07-79-54007	Area-wide engineering & design	500,000	500,000
Native Village of Unalakleet	07-69-54009	Feasibility study for rock quarry	35,000	35,350
Native Village of Solomon	07-69-54010	Multi-purpose Center	1,100,000	1,100,000
	07-09-04010	Multi-purpose Center	400,000	400,000
EDA'S WESTERN ALASKA FISHERIE	S DISASTED DE	OCRAM INVESTMENTS -	7,875,000	7,875,350
AK State, DOT/Lake & Peninsula Borough	07 70 50000	ROGRAM INVESTMENTS FUNDE	D FY2001	
Aleutian E Borough-False Pass, City of	07-79-56060	Williamsport-Pile Bay Road Improvements	250,000	470,000
Aleutian E Borough-Nelson Lagoon, Native Village	07-79-56061	Water System Improvements	250,000	564,800
Allakaket Village Council	07-79-56062	Water System Improvements	250,000	550,000
Circle Traditional Council	07-79-56069	Construction of Visitor's Center	300,000	582,000
City of Egegik	07-79-56063	Visitors Facility-Hotel	725,000	1,325,000
Galena, Vocation Education Hub	07-79-56065	Elec. Power Acquisition, Gen. & Distr.	750,000	1,553,643
Kipnuk Traditional Council	07-79-56066	Regional Hub Training Center	1,300,000	1,780,000
Nilavena Tribal Consortium (Iliamna, Pedro Bay)	07-79-56067	Halibut Processing Facility	200,000	255,000
*St. Mary's - Vocational Education Hub	07-79-56070	Multi-purpose center	400,000	630,000
UA - Fairbanks - Yukon Flats Career Training Ce	07-79-56071	Regional Hub Training Center(Pending)	1,400,000	3,800,000
Yukon Delta Fisheries Development Assoc.	07-79-56068	Regional Hub Training Center	1,200,000	1,560,000
- Shortes Development Assoc.	07-79-56064	Ice Machines in 3 villages	191,000	255,000
			7,216,000	13,325,443

### Pribilof Islands Restoration Advisory Board

West Coast International Hotel
January 31, 2001

Attending: Richard Legatski, John Lindsay, Dennis Hall, Tom Simon, Celestia Mayasleca, NOAA; Victor Merculief Sr., Anthony Merculief, TDX; Max Malavansky, City of St. George, Laurence Lestenkof, Andy Kashevarof, Bret Coburn, St. George Tanaq Corp; Louis Howard, ADEC; Martha Malavansky, St. George Member-at-Large; Jason Bourdukofsky Sr., St. Paul Member-at-Large; David Ausman, PolarConsult; Darren Burks, IT Corporation; Robert Taylor, NOAA Office of General Counsel; John Olson, Island Herder's Association; Bill Arterburn, BSE; Mike Zacharof, St. Paul Tribe; Boris Merculief, St. George Traditional Council. John R. Merculief and Myron Melividov from the City of St. Paul participated by conference call.

Opening and Introductions

**Public Comments** 

Approval of Previous Meeting Minutes. Deferred until later in the meeting.

**Communities Member Communications** 

**Activities Report** 

**Budget Report - FY00 Spending and Project Spending History** 

Mr. John Lindsay, Pribilof Islands Environmental Restoration Project Manager, went over the spending table (contracts expenditures and administrative costs) covering the period from 1994 through 1999 when the Western Administrative Service Center (WASC) headed the cleanup project, and from April 1999 to the present when the Office of Response and Restoration headed the cleanup project. Mr. Lindsay told the RAB that unless more help was hired he would be unable to spend much of the approximate \$7 million funding available for FY 01 field season. There is a backlog of site characterization reports from 1999, and approximately 60 reports pending from 2000 that must be reviewed. There are only two NOAA staff members with a regulatory background available now to perform this work, in addition to initiating and overseeing FY01 work. In addition, Mr. Lindsay pointed out that not all of the \$7 million would be obligated to project activities as some funds must be retained to cover unanticipated expenses and salaries for at least the first part of the next fiscal year beginning in October as approval of the federal budget is frequently delayed several months. The Project intends to enter into negotiations on a project priority basis. Following these initial negotiations, NOAA will determine if additional contractual activities could be possibly initiated this fiscal year. If the answer is yes, then NOAA will consider tasking second priority projects.

The effects of the Presidential hiring freeze on the project were discussed. RAB members expressed concern that the freeze would affect the on-islands work schedule. Mr. Lindsay agreed that this was a concern that he shared. The hiring freeze is hoped to end within two or three months. Mr. Lindsay explained that any new hires would be short-term employees hired for the duration of the most concerted period of the cleanup effort only.

A question was asked about the amount of funding. There was concern that it was inadequate for the work effort required in the short-term of FYO1. Mr. Lindsay agreed and told the board that additional work could be added during FYO1 if greater funding and the additional staffing were provided.

### Review and Discussion of PL 106-562

### Requirements and NOAA Action Plan

Mr. Legatski provided a summary of the PL for RAB member review and discussion. The Act's authorization of economic development funds is for a maximum of \$28M over 5 years. Any funds appropriated under this authorization will be transferred to the Department of Interior, which will administer grants to the communities.

For landfill construction, a maximum of \$6.5M has been authorized for St. Paul and a maximum of \$3.5M has been authorized for St. George. Legatski reminded the board that the Cities of St. George and St. Paul have until June 21, 2001, to enter into a written agreement with the state specifying the parcel or parcels of land to be used for new landfills, or the funds cannot be provided.

Section 104. Disposal of property. Legatski told the board that NOAA was well on its way to providing a report on the status of properties that have been, or are to be, transferred.

Section 105. Termination of Responsibilities. Mr. Legatski clarified that the termination clause would only apply to property after the property has been cleaned up to the point that it can be offered for transfer of ownership. Mr. Taylor explained to the board that parties who dispose of any materials, not just hazardous materials, after cleanup may be liable for contribution to any cleanup costs resulting from that disposal.

Section 106. There were no comments from the RAB.

Section 107. Mr. Bourdukofsky asked if NOAA would expend funds to assist with cleanup of contaminated soils from sites such as removal of USTs at private homes. Mr. Lindsay said that while NOAA had to give priority to its mandated requirements, it was possible that the ETC units could be used to assist with such issues. Mr. Legatski commented that the cost of treating soils from private home sites might have to be paid from funds other than the cleanup funds authorized under PL 104-91 and 106-562. Mr. Coburn asked about the interest rate on loans under Section 107. The interest rate on loans under Sec. 107 will be dependent on the mechanism used by AK to distribute the funds. Board members were concerned that funding appropriations would be reduced compared to authorizations. Mr. Legatski agreed that could be the case, and explained the federal funding process and issues related to the new Presidential administration to the board. There was a question about the supplemental appropriations process and when it would begin. Mr. Legatski explained the process. The cleanup funds authorized in section 107 are specific to the Pribilof Islands restoration effort.

### Break

Landfill Closures. NOAA gave a video presentation on landfill closure activities. The active landfill, Cell C, on St. Paul Island has only about six months capacity left based on determinations from ADEC and the City of St. Paul. TDX stated that the platting is being sent to the City of St. Paul for consideration of an adjacent 25-acre parcel of land for an interim landfill and transfer station. The City still has to vote on its willingness to accept the land. NOAA is also intending to transfer the existing landfill property (Cell C) to the City after it is closed per a pre-existing agreement. Mr. Lindsay had offered the cities of St. Paul and St. George the opportunity to provide funding through a cooperative agreement to develop a permit for the interim landfill, but Public Law 106-562 recently passed prohibits the use of cleanup funds for activities directly related to landfill redevelopment. NOAA created a pad at Cell A adjacent to the active landfill for the City of St. Paul's scrap metal storage. NOAA is awaiting a response from ADEC stating that the area under the pad has been properly closed. Mr. Lindsay told the RAB that while the site has been characterized and cleaned, there is no guarantee that more drums aren't out there.

The City of St. Paul called in to the meeting at this time. Mr. Legatski reiterated that there was a deadline of June 21 for the City to provide a plan to the state for landfill. A copy of the letter that had been sent out on January 11 explaining this to the City was faxed to Mr. Melividov during the lunch break. The mail delivery of the January 11<sup>th</sup> letter had not yet arrived on St. Paul apparently due to the interruption in normal service related to the bankruptcy of Reeve Aleutian Airways.

Louis Howard, Mr. Legatski, and Max Malavansky, discussed the requirements for providing a landfill plan to the state in detail.

### New Landfill Developments.

St. Paul Island. Mr. Lindsay provided a slide showing the proposed sites for the new landfill within the 25-acre area at Polovina proposed by TDX for landfill use. He talked about the problems that had been found (disruption of view, soil contamination, distance from the airport, proximity to lakes) with the various site iterations. The most recent proposal was a site within the sand dune environment with low to no contamination levels and out of public view.

St. George Island. Mr. Lindsay showed a slide giving a rough description of the existing landfill area and sites discussed with the City to date. Mr. Lindsay expressed NOAA's desire to work with the state and the City for a solution to the final closure of the existing landfill and the interim solid waste disposal problem. NOAA desires to conclude its approved activities to close the existing landfill during 2001. However, NOAA will continue to work with the City on finding a solution to the alternative disposal problem while redevelopment plans are on hold pending the appropriation of funds. Mr. Malavansky said that the City is keeping tight control of what is being placed in the

landfill, and agreed that there was a need to continue discussions on how to resolve interim and final disposal solutions with NOAA and ADEC. Mr. Howard affirmed the State's willingness to assist with the process. NOAA is also precluded from giving funds it has received under the new legislation to the State for new landfill development.

### Island Project Status Report - St. Paul Island, Summary of FY00 Activities.

NOAA spent \$10M during FY00 on cleanup activities on the islands. Most work was done on St. Paul. More work will be done on St. George in FY01, however the extent of field activities on both islands in 2001 will be dependent on whether or not new NOAA staff are hired. Mr. Lindsay reiterated what he had stated at the beginning of the meeting in that the Project's present staffing levels are wholly inadequate to allow the overall project to continue at the pace conducted over the past two field seasons. Mr. Lindsay showed slides of site distributions over the island and listing the various projects. He showed a video on GPS training provided by NOAA to interested local individuals and the establishment of geodetic control. Mr. Lindsay pointed out that resulting effort led to the finding that the NOAA navigational charts were off by approximately 180 meters to the northeast. This finding led NOAA to issue new navigational charts for the islands within approximately the last two weeks. Mr. Lindsay discussed the island-wide debris removal effort and showed a video. This was not a TPA requirement, but rather a general cleanup as required under PL 104-91. He also discussed how he had recognized a need to address materials stored in buildings on NOAA-owned sites. Over 800 barrels of used oil and hazardous materials were removed from the island. He explained the Blubber Dump PCS ETC soil treatment process and showed a video on the work. Stockpile treatment will be a continuing project. Island stratigraphy is a concern because of potential contamination of ground water supplies. NOAA has entered into an agreement with USGS to perform the stratigraphic survey during the 2000 field season on each island, and USGS is continuing to finalize its report. Mr. Lindsay discussed the prohibition by PL 106-562 to expend cleanup funds on Formerly Used Defense Sites on the Pribilofs. He went on to discuss the findings of contamination at the oil drum dump site located NW of the weather station. He pointed out that NOAA considers the Oil Drum Dump Site as a FUDS. Mr. Lindsay talked about the COE's cleanup efforts, which included moving most but not all drums from the site which resulted in further releases at the site.

Mr. Lindsay discussed groundwater investigations at the Vehicle Boneyard Site. Contamination was found in all but one monitoring well. While there is concern that the contaminant source is unknown, the contaminant levels are very low and do not exceed State regulatory cleanup levels. Mr. Lindsay again pointed out that the barrel disposal site adjacent to the Vehicle Boneyard Site and the proposed new landfill site is a FUDS, and that NOAA is not taking any further responsibility for that barrel disposal site. Mr. Lindsay noted that NOAA considers Telegraph Hill and the Ridge Wall Scoria Pit FUDS as well. At Telegraph Hill, some barrels were removed and the soil was tested for diesel contamination. The levels were not high enough to require remediation. NOAA is taking additional groundwater monitoring well samples this winter at Telegraphy Hill only because of the proximity to the drinking water well field.

Mr. Lindsay showed a video of the removal action at the Dune Vehicle Boneyard Site. Mr. Bourdukofsky asked about the Ocean Clipper. Mr. Lindsay commented that he understood that the US Department of Justice initiated action against the owner of the Ocean Clipper to get them to clean it up. However, the owner declared bankruptcy. Mr. Bourdukofsky believes that since this is on NOAA property (a fur seal rookery) the removal of the Ocean Clipper should be NOAA's responsibility. The NOAA attorneys present both stated that NOAA is specifically precluded from using appropriated funds for cleanup of this vessel. Alternatives such as talking to NMFS or the owner were discussed.

Mr. Lindsay also briefly discussed the following sites on St. Paul:

Cell B Hill Side Barrel video of removal action.

Cell B. Site characterization performed.

Pumphouse Lake. A NFA letter will be requested.

NMFS Fuel Barges - Removal. Video.

Cliffside Landfills. Debris at base of Village Hill left behind by NMFS. Debris found on Reef Point site was removed. Some debris is lodged in cliff side crevices will be left there. An NFA letter will be requested.

Tract 46. 28 wells were installed in Tract 46. There are two primary plumes, one gasoline and a second one that was discovered late in the FY00 work season. More wells need to be installed to determine the extent of contamination at the second plume associated with the tank saddles in Tract A.

Former Gas Tank Farm. NFA letter received.

Diesel Tank Farm. Some soil removal will probably be required. Contamination goes down to the bedrock.

Lukanin Bay Debris. An old hot spot of oil was noted in an old report and a removal action is pending during 2001. A video was shown of a tank removal. Vegetation was replanted on the site by BSE.

Salt Lagoon Diesel Seep. CESI found contamination covering 2-3 acres where the crab pots are being stored. Low-level contamination also extends from the mouth of the lagoon down to the entrance to the lagoon channel. NOAA is working with the COE to try to overlap their salt lagoon channel improvement project with NOAA's cleanup project. NOAA intends to do a remedial design for the upland portion of the site this season.

Icehouse Lake. An NFA had been received, however, some stains looked suspicious and Mr. Lindsay found documentation indicating that contamination exists at the site. NOAA ordered a limited removal action and fairly extensive contamination was found. Further site characterization and removal action is intended for 2001.

Scoria Pit – Lake Hill. Appears to have been a debris site and is apparently clean. An NFA letter will be requested.

Non-TPA sites.

Aleut Bunkhouse. NOAA removed the building and NOAA will request an NFA letter. Bulldozer in Bog. The bulldozer was removed and NOAA will request an NFA letter.

Barrels at North End of Salt Lagoon. 26 or 27 abused barrels were identified and marked in 1999 and removed in 2000.

Debris Below Big Polovina. Barrels and a dump truck were removed, and NOAA will request an NFA letter.

SW Point Former LORAN Station. This is a FUDS site. However, NOAA cleaned it up last year. An NFA letter will be requested.

Blasting Cap Site. Army personnel disposed of the blasting caps and NOAA will request an NFA letter.

Mr. Lindsay noted that NOAA's contractors found low levels of diesel oil contamination in the drinking water taken from taps on the island. In addition, bromoform was found at levels that will be considered unsafe in the next few years. Mr. Lindsay noted that he had informed in writing ADEC and the City of St. Paul of this contamination.

### Lunch

### Island Project Status Report - St. George Island

NOAA's Mr. Dennis Hall provided an overview of last season's activities on St. George.

Boneyard B. Sampling showed some contamination still there. Contaminated soils were excavated and taken to the ETC system for treatment. NFA will be requested.

Oil Drum Dump Site. Contaminated soils were removed to removal. Site still contaminated. Further characterization is planned for this field season.

Rest of sites (16-25) had no activity.

Former ballfield will be characterized this field season.

NFA requests will be requested for St. George TPA sites 12, 15, 16, 19, 22-4, and 22-5.

### Review of minutes from March 7, 2000 and May 11, 2000 RAB meetings.

Remove "not" from 3/7/2000 minutes, page 4, paragraph 2, PCS Stockpile Treatment, last sentence. Motion made and carried to approve minutes from 3/7/2000 St. George meeting with the recommended change.

Motion to approve minutes from 5/11/2000 St. Paul meeting carried.

### Clean-up Program Status and FY01 Schedule.

TPA Sites

Oil drum dumpsite. NOAA considers this site a FUDS and therefore in accordance with PL106-562, NOAA does not intend to conduct any further action at this site. Vehicle Boneyard. If buried debris is not found then an NFA letter will be requested. If buried debris is found NOAA will evaluate whether excavation will more easily enable site closure than placement of a soil cover.

Little Polovina Boneyard. Closed, NFA letter received.

Dune Vehicle Boneyard. NFA letter requested.

Landfill, Cells A, B, C. NOAA intends to enter into a cooperative agreement with the City of St. Paul to develop a closure plan for Landfill Cell C and Cells A and B. NOAA intends to enter into an 8a contract with BSE to perform a corrective action at Cell B.

Pumphouse Lake. NFA request pending.

NMFS Fuel barges. NFA request pending. Cliffside Landfills. NFA request pending.

<u>Tract 46</u>. additional site characterization will be performed, followed by corrective actions, if funds are available.

Former Gas Tank Farm. NFA letter received.

Diesel Tank Farm. corrective action pending.

<u>Lukanin Bay Debris</u>. limited site characterization followed by a removal action. <u>Salt Lagoon Diesel Seep</u>. working on remedial design to be in sync with COE work on channel dredging. Environmental assessment of lagoon will be required. Ice House Lake. Site voluntarily reopened by NOAA when contamination found.

Scoria Pits. Telegraph Hill and Ridgewall are FUDS sites.

Lake Hill. NFA request pending.

PCS Treatment. PCS Treatment will continue at the Blubber Dump stockpile site.

NOAA intends to enter into an 8(a) contract with BSE to continue work. Treated 1600 yards last year. Some asphalt contamination present that seems to have caused difficulties with treatment. Need to see if more treatment required for previously treated soils still showing contamination signs. If asphalt contaminated soil can't be treated this year it will be shipped off island.

Groundwater Well Monitoring. 40 wells will be monitored on a quarterly basis.

Jason Bourdukofsky commented that a local entity should be allowed to perform the quarterly monitoring. Mr. Lindsay and Louis Howard (ADEC) noted that by regulation such work could only be performed by a qualified individual. Qualifications include at least a four-year college science degree, two years of environmental experience, and certified by ADEC. So far no individuals on St. Paul have been identified that meet these qualifications. NOAA indicated that it is willing to entertain any proposals from qualified individuals or on island firms.

<u>FUDS Sites, St. Paul</u>. There were several reports reviewed by Mr. Lindsay. Results are shown in the FUDS table found on the Closure Status on St. Paul Island slide.

St. George. PCS stockpile treatment remains a priority on St. George. Approximately 4,350 yards of PCS were successfully treated last year. Mr. Lindsay noted that from now on NOAA will follow the two-party agreement that limits NOAA's cleanup responsibilities to regulations in force as of 1991. Consequently, benzene cleanup levels in treated soils will be set at 0.5 ppm instead of the newer regulatory standard of 0.02 ppm. Mr. Lindsay noted that the 0.02 ppm standard is being nearly achieved with the present treatment system, but achieving the lower standard for a relatively small amount of soils is becoming cost prohibitive.

Mr. Lindsay reviewed TPA Site Status and schedule of activities on St. George as of 31 January 2001. No dissenting comments were aired by RAB members.

The number of corrective actions implemented during FY 01 will be dependent on funding and project staffing. While NOAA intends to conduct some removal actions on St. George this coming field season, NOAA staff first needs to review earlier site investigations reports and discuss these with its intended contractor, Tanaq Corporation (or its 8a subsidiary).

Open Pit Site – a likely candidate for corrective action this year.

Ballfield/Former Landfill – NOAA will conduct a site investigation this year.

St. George Schoolyard Landfill – NOAA has an NFA letter on part of the area. Another part of the area is a non-TPA site and is still in need of closure. NOAA has pulled this property out of the transfer until cleanup issues are resolved.

FUDS Sites, St. George. Three sites, closed. No further problems known.

Other Issues. National Historic Preservation Act (NHPA) requirements must be met, and they will be very demanding. While Mr. Lindsay had sought input from St. Paul entities regarding NHPA compliance, he admitted that he failed to bring this matter to the attention of St. George Island. Mr. Lindsay stated that he would do so in the near future. NHPA compliance was not anticipated and is an additional workload. NOAA needs more help to perform the work required under this Act.

Coastal Zone Consistency Determination. This is another unanticipated requirement. NOAA will be working on this as resources permit.

Mapping. There were no adequate maps of the islands available. NOAA shared equally with a contribution by USGS to create new topographic maps of the islands, excepting Walrus Island. Mr. Lindsay noted that St. Paul Island, through Mr. Victor Merculief (TDX Vice President of Real Estate) will submit Aleut place names for inclusion on the topographic maps. Mr. Lindsay encouraged St. George Island to similarly take advantage of this opportunity and provide Aleut place names. Bret Coburn (Tanaq Corporation) stated that Mr. Iliodor Philemonof had initiated naming. Mr. Coburn will attempt to submit place names for St. George. Mr. Lindsay provided RAB members with the point of contact, Mr. A.C. Brown, for USGS (Anchorage office) in this regard.

RAB members were encouraged to contact Mr. Lindsay if they believe the work priority should be shifted elsewhere.

St. Paul Machine Shop Transformation to Public Safety Complex. This item is no longer relevant and was removed from the agenda.

**Next Meeting Agenda Items, Date, Location.** It was suggested that the next meeting be held during the first or second week of June with meetings held on each island, possibly on a Tuesday and Wednesday.

### Other Business/Comments.

RAB members raised concern over the adequacy of funding under the new appropriations legislation and they inquired as to the supplemental appropriations process.

Mr. Bill Arterburn (BSE) suggested that sites should be prioritized to ensure that the most important were addressed with available funding. Mr. Lindsay offered a draft prioritization and is looking for comments from RAB members. This could be an agenda item at the next meeting. Several members encouraged NOAA to hire additional staff to allow the greatest progress with the available funds.

Several RAB members complimented NOAA on the management of the project over the past year and a half. Ditto on the presentation.

### Handouts:

Agenda

Minutes, March 7, 2000, St. George RAB meeting

Minutes, May 11, 2000, St. Paul RAB meeting

Island Project Status Report – St. George Island, Summary of FY00 Activities

The Pribilof Islands Transition Act, Public Law 106-562, Title I, Enacted December 23, 2000, Summary of Provisions

CD, Pribilof Islands Project Office. There were not enough copies for all members at the meeting. Copies can be obtained from Mr. Tom Simon at NOAA's Office in Seattle.

### PRIBILOF RESTORATION ADVISORY BOARD

### **RAB Co-Chairs**

Elary Gromoff, Jr. Tony Pierpoint

### Island Co-Chairs

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Aquilina D. Lestenkof P.O. Box 107 St. Paul, AK 99660 Phone: (907) 546-2641 Fax: (907) 546-2655 \*Alternate: Simeon Swetsof

St. George Island Total number of Sites: 32 Sites Completed by FY01: 5 (16%) Site Completions Slated for FY02: 12 (55% total) Site Completions Slated for FY03: 7 (77% total)

## TPA SITES CLOSURE STATUS ON ST. GEORGE ISLAND

Site	TPA	Site Name	FYOI	FY02	FY03
No.	Site No.		Status	Status	Status
1	1	Former Diesel Tank Farm		Open	TBC
2	2	Former Drum Storage Area		Open	TBC
3	3	Inactive Gas Station		Open	TBC
4	4	Active Landfill		TBC	
5	5	Ocean Dump Site		TBC	
9	9	Open Pits Site		TBC	
7	7	Ballfield/Former Landfill		Open	Open
80	8	Active Power Plant		Open	Open
0	6	Old Power Plant		Open	TBC
10	10	Former Drum/AST Storage	NFA		
		Area			
11	11	Cottage C UST		Open	TBC
12	12	Former Hanger Bldg.		TBC	
13	13	Makushin Pit	NFA		
14	14	Oil Drum Dump		Open	TBC
15	15	Boneyard B		NFA	
16	16	Boneyard C		TBC	
17	17	Cross-Hill Dump	NFA		
18	18	Former Fuel Storage Area		Open	TBC
19	19	Old Carpenters Shop		TBC	
20	20	Old Coal House	NFA		
21	21	Abandoned City Diesel Tank Disposal Site		Open	Open
22	22-1	School UST		TBC	
23	22-2	Current Carpenter Shop USTs		Open	Open
24	22-3	Shop/Store UST		Open	Open
25	22-4	Old Airport Hangar		TBC	Open
26	22-5	Gas Station #1 UST .		TBC	
27	23	Abandoned Diesel Tank Farm		TBC	
28	24	Inactive Gas Tank Farm		TBC	
29	25-1	Port Fuel Supply Line E-W		Open	TBC
30	25-2	Port Fuel Supply Line N-S		TBC	
31	NTPA	St. George	NFA		,
32	NTPA	Petroleum Contaminated		Open	Open
		stockpile			

### NOAA's Project Priorities for St. George Island during 2002

PCS Stockpile Treatment

- estimated 1000 cyd<sup>3</sup>

Village Site Cleanup

Underground Utility Survey

Fill Abandoned Diesel Tank Farm - estimated 3,400 cyd<sup>3</sup> fill

Open Pits Site - estimated 100 cyd<sup>3</sup> DRO Inactive Gasoline Tank Farm

- estimated 85 cyd<sup>3</sup> DRO Schoolyard UST

- estimated 1000 cyd<sup>3</sup> DRO

Old Carpenter's Shop - estimated 3.9 cyd<sup>3</sup> lead Former Port Fuel Supply N-S Line Only - estimated 100 cyd<sup>3</sup> DRO

Focused Feasibility Studies:

Active Power Plant/Carpenter Shop UST

Old Power Plant and Former Fuel Storage Area (TPA Sites 9 and 18)

Complete Village Groundwater Characterization Install 4-5 monitor wells

Groundwater Monitoring – 2 quarters (e.g. June and September)

Pribilof Island Environmental Restoration Project Estimated (as/of 4/04/02) Budget in Millions of Dollars for FY02 [FY 01 Carryover: \$2.4 million. FY02 Appropriation \$4.0 million]

		Open Dite Site (TDA 6)
	Subtotal	ST. GEORGE REMEDIATION
		Old Power Plant and Former Fuel Storage Area (TPA Sites 9 and 18)
		Active Power Plant/Current Carpenter's Shop UST (TPA Sites 8 and 22-1)
		Underground Utility Survey
		ST. GEORGE REMEDIAL DESIGN
	Subtotal	
		Groundwater Sampling at 32 wells (2 quarters)
		St. Paul Groundwater
	Subtotal	
	3)	Decommissioned Power Plant and TCE Investigation (2100 yd3 PCS)
		Former Power Plant (Former Post Office) (260 yd3 PCS)
		Former Alaska Dormitory (400 yd <sup>3</sup> PCS and UST)
		Receiving Warehouse (150 yd <sup>3</sup> PCS)
		Gas Station and Machine Shop (700 yd <sup>3</sup> PCS)
		Old Movie Theater (50 yd <sup>3</sup> PCS)
		Tract 46 (TPA Site 9)
<b>\$0.00</b>	Outroid	CT DAIII DEMEDIATION
\$0.08	Subtotal	
\$0.08		Landfill Closure Plan (Cells A, B and C)
		ST. PAUL DUMP CLOSURE (TPA 5)
\$0.18	Subtotal	
		Lukanın Bay Well Installation/soil sampling
		Diesel Seep Upland Hemedial Design (TPA 13)
\$0.18		Disposition in the second contraction in the
0 10		Diesel Seen Characterization
		Underground Utility Survey
		Tract 46 (Old Machine Shop, Cascade Bldg. and AST Saddle Complex)
		ST. PAUL SITE CHARACTERIZATION - REMEDIAL DESIGN
	Subtotal	
		St. Paul PCS Stockpiles at Blubber Dump, Big Polovina (2500 cu. yd.)
		St. George PCS Stockpile Treatment On-Island (1000 cubic yd.)
		CO GIOCATICE INEMI
\$0.00	Suprorai	BCG STOCKBILE TREATMENT
*n 33	Subtotal	
\$0.05		St. Paul Misc. Used Oil/Hazmat Removal
\$0.03		St. Paul Misc. Debris Removal
\$0.24		St. Paul Misc. Debris Removal (overrun from FY01)
\$0.01		St. George Misc. Used Oil/Hazmat (Non-TPA)
-		ISLANDS DEBRIS AND HAZMAT CONTROL CONTINGENCY
FY02		Activity

St. George Schoolyard/landfill (non-TPA)

Inactive Gasoline Tank Farm (TPA Site 24)  $85\ yd^3$  Former Port Fuel Supply N-S Line Only (TPA Site 25 )

Old Carpenter's Shop (TPA 19) 3.7 yd<sup>3</sup> lead Abandoned Diesel Tank Farm (TPA Site 23) restore site

Open Pits Site (TPA 6)

St. George Groundwater

New Well Installations (Schoolyard, Active Power Plant, Village) 20 Wells (TPA Sites 1,2,3,7 8, 9, 11, 18 22, 23 and school) 2 Quarters

ADEC Oversight	Equipment and supplies  National Historic Preservation Act Compliance	RAB Activities Utility Trucks Lease/Gas Vehicle Maintenance and Storage	*Contract Technical Support Contract Admin Support	HQ Admin PSG Admin Salaries On Isalnd Rents	NOAA ADMINISTRATIVE COSTS Administration (salaries)
Subtotal Total					Subtotal
\$0.09 <b>\$2.14</b> <b>\$6.40</b>	\$0.21	\$0.07	\$0.26 \$0.35 \$0.02	\$0.20 \$0.20 \$0.04	\$0.50
			_		

\*Contract technical costs have increased due to the lack of qualified staff.

## St. Paul Island Deliverables Status as of 4/03/02

Big Polovina Staging Area Salt Lagoon Debris Site NMFS Compound Airport Drum Storage	Telegraph Hill (TPA 15-1) SNP Landfill Drum Removal (TPA 5)	NORTECH TPA Lukanin Bay Debris (TPA 12)	Tract 46/Tract A Site Characterization Report Sections 1, 2, 3 Sections 4 Section 5 Section 6 Sections 7,8 Diesel Seep Site Characterization Report ODDS Site Characterization Report Vehicle Boneyard Site Characterization Report Telegraph Hill Site Reconnaisance Report St. Paul Landfill Groundwater Characteriazation Report Tract A SCP Tract A Old movie Theater SCR	Deliverables
			9/26/2001 8/20/2001 9/3/2001 9/3/2001 4/18/2001 4/25/2001 4/13/2001 4/11/2001 1/15/2001 5/13/2001 9/9/2001	Revised Proposed Delivery
3/1/2001 4/11/2001 4/2/2001 4/16/2001	3/19/2001 4/16/2001	3/9/2001	11/5/2001 11/19/01 Sec 4.1-4.3 11/28/2001 12/7/2001 12/7/2001 1/9/2002 5/1/2001 5/9/2001 5/1/2001 4/17/2001 4/17/2001 4/17/2001 4/17/2001 4/17/2001 4/17/2001 1/9/2002	Intial Draft to NOAA Con
3/19/2001 11/18/2001 12/18/2001 12/6/2001	4/18/2001 12/4/2001	11/18/2001	on hold 5/24/2001 5/24/2001 5/24/2001 5/24/2001 4/26/2001	NOAA Comments to
5/3/2001 11/29/2001 3/12/2002	NOAA Mailroom 12/4; 2nd set received 12/27/01 5/4/2001	Draft Lost by	on hold on hold 2/28/2002 on hold 5/8/2001	Draft to NOAA
5/4/2001 12/5/2001	5/8/2001		5/8/2001	Draft to
	6/4/2001		5/31/2001	ADEC Comments to NOAA

Decommissioned Power Plant Corrective Action Plan Old Movie Theater Corrective Action Plan Gas Station and Machine Shop Corrective Action Plan Former Power Plan (Frm Post Office) CAP Alaska Dormitory CAP Tract 50 Asbestos CAP 2002 Groundwater Monitoring Plan Lukanin Bay Supplemental Site Characterization Plan Tract 46 Groundwater Treatment Feasibility Study Diesel Seep Upland Soils Focused Feasibility Study Groundwater Use and Classification, St. Paul Island	City of St. Paul Landfill Closure Plan, St. Paul Island, Alaska	Foster Wheeler Petroleum Contaminated Soil Remediation	BSE ETC Closure Report for 2001	Lukanin Bay (TPA 12) Site Characterization Report 8/3 Windmill Wells Salt Lagoon Diesel Seep (TPA 13) Site Characterization Rpt	IT Corporation February Groundwater Monitoring Report May Groundwater Monitoring Report September Groundwater Monitoring Report Annual Groundwater Monitoring Report 2001 IceHouse Lake Site Characterization Report
			12/10/2001	8/30/2001 in Rpt	10/15/2001
3/209/2002	4/2/2002	7/27/2001	12/13/0`	11/3/2001 10/3/2001	4/13/2001 7/5/2001 ' 3/12/2002 3/12/2002 8/17/2001
4/1/2002				12/7/2001 None	
			3/5/2002	2/22/2002 2/22/2002	12/6/2001 w/o
				3/12/2002 12/5/2001 3/13/2002	3/27/2002 3/27/2002 3/27/2002 3/27/2002
				3/27/2002	

### NOAA's Project Priorities for St. Paul Island during 2002

Landfill Closure Plan

PCS Stockpile Treatment

- estimated 2500 cyd<sup>3</sup>

Tract 46 Site Cleanup

Underground Utility Survey

Decommissioned Power Plant

- estimated 2100 cyd<sup>3</sup> DRO & Potential

TCE

Former Power Plant

Old Movie Theater Alaska Dormitory

Gas Station and Machine Shop

Receiving Warehouse

- estimated 260 cyd<sup>3</sup> DRO

- estimated 50 cyd<sup>3</sup> DRO

- estimated 100 cyd<sup>3</sup> DRO - estimated 700 cyd<sup>3</sup> DRO

- estimated 150 cyd<sup>3</sup> DRO

Focused Feasibility Studies:

Diesel Seep Site

Tract 46 Groundwater

DRO

GRO

Benzene

- estimated 12,000 cyd<sup>3</sup> DRO

Lukanin Bay Petroleum Contaminated Soils Site

Groundwater Monitoring – 2 quarters (e.g. June and September)

### SIGN-IN SHEET

NAME	ORGANIZATION	PHONE	E-MAIL
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NAME	BILL HATERBORN	Elary Gromoff Jr.	John Ray Field	Richaldo LEGATSK	DAVID AUTURN	Boris. R. Merculief	V	MAX WALSUANSICY	Jayid B. Winandy	N'IR BARNEA	John Lindsay	Tim Finnigan	Michael Dart			

	AGTN	Tract 50 asbestos in soil		Open	TBC
	d <sub>6</sub>	Receiving Wharehouse		LBC	7
	96	Former Gasoline/Diesel Drum Storage		Open	Open
	u <sub>6</sub>	Gas Station and Garage		TBC	
	AGTN	will Wells			IBC
	AGTN	Petroleum Contaminated Stockpile		Open	Open
	AgTN	Blubber Dump Debris	AHN		
	AgTN	SW Point Former LORAN	MEA		
	AGTN	Big Polovina Debris	AHN		
	AgTN	Barrels at North End of Salt Lagoon	NFA		
	AgTN	Explosives Storage Bunker	NEA		
	AgTN	Bulldozer in Bog	NEA		
(	AgTN	Aleut Bunkhouse	NEA		
- (	TPC	Scoria Pit - Ridge Wall		ENDS	
1	TSP	Scoria Pit - Lake Hill	EU EU E	TBC	
- 1	Test	Scoria Pit - Telegraph Hill	ENDS		
9	ÞΙ	Iceponse reke		uədo	Open
(	139	Salt Lagoon Diesel Seep (channel)		uədo	Open
1	139	Salt Lagoon Diesel Seep (uplands)		Open	TBC
8	12c	Lukanin Bay petroleum contaminated soil		Open	TBC
- 7	15P	Lukanin Bay Debris Area B		NEA	
1	128	Lukanin Bay Debris Area A		NEA	
(	II	Diesel Tank Farm		Open	uədo
6	OT	Former Gas Tank Farm	NEA		
8	w <sub>6</sub>	Contaminated Salt Water Wells		Open	TBC
- 1	T6	Old Sealing Plant (Barreling Shed)		Open	uədo
9	36	AST Saddle Complex		Open	Open
9	F6	5 Car Garage and Anderson Bldg.		Open	TBC
1	Ţ6	E-Shop/Radio Building and Duplex		Open	TBC
8	Ч6	Former Alaska Dormitory	10.75	TEC	
7	£6	Former Fouke Bunkhouse		nədo	uədo
I	36	Old Coal Shed (Cascade Bldg)	Salekalle	Open	obeu
C	96	Municipal Garage/Machine Shop		uədo	Open
- 6	P6	Decommissioned Power Plant Annex		IBC	
8	26	Decommissioned Power Plant		IBC	100
L	96	Former Power Plant (Former Post Office)		IBC	
9	66	Old Movie Theater		IBC	
9	वार	Village Landfill		NEA	
- 5	Ila	NMFS Landfill		NEA	
3	PL	NMFS Fuel Barge: East Landing		NEA	
2	27	NWFS Fuel Barge: Black Bluff		NEA	
I	qL qL	NMFS Fuel Barge: Lagoon Channel		NEA	
		NWES Enel Barge: North End Lagoon		NEA	
0	9	NMES End Barge. North End Lacon	NEA		
		Cell B solid waste	· ·	Open	IBC
	29	Cell B drum dump		uədo	TBC
	25			Open	TBC
	qg	Cell A	-	uədo	uədo
	58	St. Paul Landfill (active Cell C)	NEA		
	Đ	Dune Vehicle Boneyard		-	
	3	Little Polovina Boneyard	NEA	uədo	uədo
	2	Vehicle Boneyard	0000	4940	4640
	I	Oil Drum Dump	ENDS	Chama C	nma
.01	.oV		Status	Status	Status
			FYOI	EX05	EA.03

# St. George Island Deliverables Status as of 4/03/02

Deliverables

Comments to NOAA Draft to ADEC Draft to NOAA Comments to Contractor

Final Draft Final Draft to

Comments to to NOAA

Contractor

**Tetra Tech EMI** 

Ballfield/Former Landfill (TPA 7) Site Characterization

Oceanfront Sites (TPA 1, 2 and 3) Site

Characterization Report

Carpenter Shop (TPA 19) Site Characterization

Former Fuel Storage Area (TPA 18) Site

3/25/2002

3/20/2002

3/8/2002

3/5/2002

2/22/2002

3/8/2002

3/6/2002

2/19/2002

1/21/2002

1/10/2002

Characterization Report

Abandoned Diesel Tank Farm (TPA 23) Site

Characterization Report

Abandoned City Diesel Tank Disposal Site (TPA 21)

Site Characterization Report

Village Groundwater Model Plan (on hold pending

well data assessment)

Village Groundwater Report 2001

Tanaq Corporation (PolarConsult Alaska, Inc.)

Environmental Site Investigatgion TPA Sites 14 and

3/14/2002

3/8/2002

3/5/2002

12/31/2002

12/6/2001

3/24/2002

2/4/2002 3/14/2002

ETC Soil Remediation Report for FY 01 Tanaq -Corrective Action Plans

TPA Site 24 Inactive Gasoline Tank Farm

TPA Site 6 Open Pits Site

TPA Site 19 Old Carpenter's Shop

TPA Site 25 Port Fuel Supply Line N-S

TPA Site 22-1 Schoolyard UST

IT Alaska, Inc

TPA 8 Contaminant Groundwater Plume

Investigations

3/27/2002 2/22/2002