STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN, GOVERNOR

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File: 2518.038.001

May 2, 2008

Lori Roy Remedial Project Manager 611 CES/CEVR 10471 20th St Ste 302 Elmendorf AFB AK 99506-2200

Re:

Draft Record of Decision for SS002, SS003, SS004, SS011, SS014, SS016, and

SS017 at the Big Mountain Radio Relay Station, Alaska

Dear Ms Roy:

The Alaska Department of Environmental Conservation (ADEC) Federal Facilities Oversight group received a copy of the Draft version of the Record of Decision (ROD) for SS002, SS003, SS004, SS011, SS014, SS016, and SS017 at the Big Mountain Radio Relay Station, Alaska in our office on March 21, 2008. We have completed our review of the Draft ROD and have provided comments within this letter.

In general, the state does concur with the decisions presented in this document, with a few exceptions and outstanding questions presented below.

In the section entitled Institutional Controls (ICs) the first bullet says that the USAF will delineate the boundaries with DRO above the Method Two Cleanup levels at Sites SS002 and SS014. Is there any additional sampling involved in this delineation process or will the existing information gathered from the 2005 excavations provide enough data to delineate the extent of remaining contamination? Will these boundaries be surveyed to give a more accurate picture of the area of remaining contamination above Method Two levels? If so, please indicate that the boundaries will be surveyed for the land records in this section of text. The language about delineating the boundaries is repeated on page 2-34 and so should be clarified in that section as well.

The state is concerned with the lack of any institutional controls at site SS003 as there is contamination remaining in place within the site boundaries. The Real Property Records should indicate that the contamination from SS002 has advanced into the site boundaries of SS003 and the previously mentioned surveyed boundaries should include this area of remaining contamination at SS003.

Section 2.6.2.5 states that the oversized material was used to backfill the excavation area. Were the excavations completely backfilled or just partially filled with the oversized material? If no other material was used, what is the depth of the excavation presently backfilled to? The text should describe the amount and thickness of the fill placed over the residual contamination.

In section 2.9.1 PCBs should be included as a chemical of potential concern (COPC) as it is listed in Table 2-8 as a COPC and it was detected at 0.44 mg/Kg, more than 10% of the ADEC 18 AAC 75.341 Method Two Tables B1 and B2. Please adjust the text in this section to reflect this change.

In section 2.9.2 please delete the text in parentheses (1 square foot), the language describing a very small area is adequate to depict the remaining contamination.

Thank you for providing a copy of the Draft version of the Record of Decision (ROD) for SS002, SS003, SS004, SS011, SS014, SS016, and SS017 at the Big Mountain Radio Relay Station, Alaska for our review. I look forward to a response to comments. If you have any questions regarding this letter, please contact me at (907) 269-3077 or jonathan.schick@alaska.gov.

Sincerely,

Jonathan Schick

Environmental Program Specialist