



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Response and Restoration
Pribilof Project Office
7600 Sand Point Way N.E.
Seattle, Washington 98115

September 26, 2008

Jennifer Roberts
Federal Facilities Program Manager
Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
555 Cordova Street
Anchorage, AK 99501-2617

Subject: Closure of the St. George Island, Alaska Operable Unit.

Dear Ms. Roberts:

In accordance with paragraph 59 of the Pribilof Islands Environmental Restoration Agreement (Two-Party Agreement or TPA) signed in January 1996 by designated officials of the State of Alaska and the National Oceanic and Atmospheric Administration (NOAA), NOAA requests Alaska Department of Environmental Conservation (ADEC), as the duly authorized representative of the State of Alaska, certification of NOAA's completion of corrective action for the St. George Island Operable Unit (OU).

NOAA and the ADEC identified a total of thirty-six (36) sites at St. George Island (Table 1). This number (36) exceeded the twenty-five (25) source areas identified in the TPA (Attachment A, St. George Island) due to agreed upon changes in the manner of site designation and the finding of new sites during various phases of site investigation. NOAA notes that one site, TPA 11 Cottage C UST is not subject to the TPA, and will be evaluated under NOAA's environmental safety compliance program in coordination with ADEC. However, NOAA remediated contamination at Cottage C to the maximum extent practicable. NOAA also notes that Oceanfront Site 36 (Table 1) free-phase product (refer to: 18 AAC 75.990 (43)) expressed itself as a light sheen on the water table following removal of the



overlying vadose zone. In the *Corrective Action Report and Conditional Closure Request for St. George Island TPA Site 1/Former Diesel Tank Farm, and the Former Drum Storage Area, TPA Site 2*, NOAA determined that it (NOAA) had met its obligation to recover the free-phase product to the maximum extent practicable (refer to: 18 AAC 75.325 (f) (1)). Consequently, NOAA in its closure request for TPA 1 and 2 requested that the contaminated groundwater at the site be considered not to have recoverable free phase product. Subsequently, on November 2, 2007, ADEC approved NOAA's request and granted a no further action planned (NFRAP) determination for TPA Sites 1 and 2, which included a determination on the contaminated groundwater that NOAA designated as its Site 36. Also, in a letter dated August 8, 2005, ADEC approved NOAA's *Draft Long-term Groundwater Monitoring Plan, St. George Island, Alaska*, (Plan). NOAA issued its Plan on August 19, 2005. The Plan included NOAA's long-term commitment to monitor groundwater at the aforementioned sites in addition to other sites on the island.

NOAA asserts that it has completed in accordance with the TPA all investigations and corrective actions approved by ADEC to the maximum extent practicable by:

- removing drums and debris
- removing underground storage tanks (USTs) and above ground storage tanks (ASTs)
- removing fuel pipelines
- removing contaminated soil
- closing solid waste sites,
- characterizing surface water, and
- characterizing and monitoring groundwater.

Table 1 summarizes specific environmental quality parameters at each site. Parameters in Table 1 include type of contamination (drums, surface debris and solid wastes), media contaminated (soil, surface water, and groundwater), presence or absence of residual contamination with succinct comments regards land use (aka institutional) controls, as appropriate, the date ADEC signed the NFRAP determination per TPA paragraph 59, and the current property owner.

Appendix I includes copies of all deed notices recorded with the Alaska Recorder's Office, Aleutian District, for twenty-seven (27) properties affected by residual contamination, and/or buried debris remaining in-situ at three (3) sites listed in Table 1. In addition, notice of residual contamination and/or buried debris will be identified in quitclaim deeds NOAA is drafting as it continues to transfer real property to St. George Island entities in accordance with the Transfer of Property Agreement signed by NOAA and various Pribilof Islands' entities in 1984.

Appendix II includes photocopies of the following three document types. (1) NFRAPs including signatures of both the ADEC and NOAA project managers (TPA paragraphs 42-47) for each site listed in Table 1; the photocopies are sorted in the same order as the site listing in Table 1, excepting NOAA Sites 11 (Cottage C) and 36, which

Verification of NFRAP
St. George Island Operable Unit
St. George Island, Alaska

do not have NFRAPs as discussed above. TPA paragraph 59 states: "ADEC shall not deny certification that corrective action is complete at any site(s) solely on the basis that post-remedial measures, such as monitoring, shall remain in place for a period of months or years." The NFRAP photocopies generally exclude report appendices containing items such as quantitative laboratory data and daily logs that are available to ADEC with NOAA's initial site submittals. (2) A St. George Village long-term groundwater monitoring plan. (3) A summary document describing in-situ residual soil and groundwater contamination.

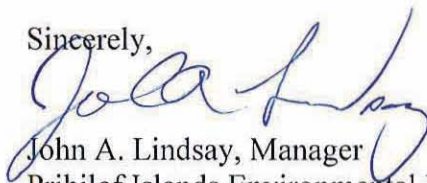
In addition, pursuant to TPA paragraph 57, NOAA maintains an administrative record (AR) for the St. George Island OU at the following four locations: St. George Island Tribal Government Center; ARLIS, Anchorage, AK; NOAA Sand Point, Seattle, WA; and the National Archives and Records Administration, Seattle, WA. Currently, the AR is complete through fiscal year 2007. Fiscal year 2008 documents will be added to the AR by the end of November 2008.

Per this submission, including Appendices I and II, NOAA requests ADEC concurrence that all corrective actions pursuant to the TPA between ADEC and NOAA signed in 1996 for the St. George Island Operable Unit are complete. Enclosed are two copies of a signature page attesting to the fact that no further remedial action is planned ("conditional closure status") for the St. George Island Operable Unit. I have signed both copies as NOAA's project manager pursuant to TPA paragraph 42.

If you concur, please sign both copies on behalf of ADEC, returning one signed copy to me and retaining the other copy for ADEC's records.

If you have any questions, please do not hesitate to contact me either in writing, or at (206) 526-4560.

Sincerely,




John A. Lindsay, Manager
Pribilof Islands Environmental Restoration Project Office

Enclosures: Appendices I and II

cc: St. George RAB Members (DVD only)
David Kennedy, Pribilof Program Director
William Broglie, NOAA OCAO
James Barrows, NOAA OCAO
Nancy Briscoe, NOAA GCNR
Craig O'Connor, NOAA GCNR
Robert Taylor, NOAA GCNR
NOAA Administrative Record

For the National Oceanic and Atmospheric Administration



John Lindsay
NOAA, Manager, Pribilof Islands Environmental Restoration Project Office




Date


Approvals:

In accordance with Paragraph 59 of the Two Party Agreement (TPA), this is to confirm that all corrective action has been completed to the maximum extent practicable for all environmental media at NOAA's TPA and Non-TPA sites comprising the St. George Island Operable Unit, in accordance with the Agreement and that no further remedial action is required as a part of this conditional closure granted by ADEC.

For the Alaska Department of Environmental Conservation



Jennifer Roberts
Alaska Department of Environmental Conservation
Federal Facilities Program Manager



Date

Table 1. Summary of Residual Soil Contamination and Buried Solid Wastes at NOAA Cleanup Sites on St. George Island, Alaska

NOAA Site No.	TPA Site No.	Site Name	Drums	Surface Debris	Solid Waste	Soil	Ground-water	Surface Water	UST/AST/Pipeline	Clean Closure	Site Conditions as of August 6, 2008	Site Status as of September 26, 2008	Property Owner(s) as of August 2008
1	1	Former Diesel Tank Farm		X		X	X		X		Diesel range organics (DRO) contaminated soil remains in the following locations: just north of and parallel to the City sewer system at depths of 5 feet below ground surface (bgs) and deeper; in an unexcavated buffer zone along the Bering Sea from the beach line inland approximately 10 to 15 feet at depths of 3 feet bgs and deeper; in the western portion of the site, at equipment refusal (due to bed rock) at depths of 7 to 14 feet bgs; and in the eastern portion of the site at the bottom of the vadose zone at 14 to 15 feet bgs. DRO, gaso-line range organics (GRO), benzene, ethylbenzene and total xylene remain in one area in the western portion of the site at bed rock depth of 14 feet bgs. Groundwater is contaminated with DRO, GRO and benzene in this area; see Site 36 below for information. Deed notice.	NFRAP 11/2/07	City of St. George; St. George Tanaq Corporation (Tanaq)
2	2	Former Drum Storage Area	X	X		X	X		X		DRO contaminated soil remains in the western-most portion of the site only in the following locations: just north of and parallel to the City sewer system at depths of 8 feet bgs and deeper; at equipment refusal (due to bed rock) at a depth of 13 feet bgs; and at the bottom of the vadose zone (in areas of deeper bedrock) at 14 to 15 feet bgs. Groundwater is contaminated with DRO, GRO and benzene in this area; see Site 36 below for information. Deed notice.	NFRAP 11/2/07	City of St. George; Tanaq
3	3	Inactive Gas Station				X	X		X		DRO contaminated soil remains just south of and parallel to the City sewer system at depths of 3.5 feet bgs and deeper. Perchloroethylene (PCE) remains in one location just south of the City sewer system from 2 to 4 feet bgs. DRO, GRO, benzene, toluene, ethylbenzene and total xylene remain in the area beneath the past location of the dispensing station at equipment refusal/bed rock depth of approximately 14 feet bgs. Groundwater is contaminated with DRO, GRO, and benzene in this area; see Site 36 below for information. Deed notice.	NFRAP 07/25/05	City of St. George; Tanaq

NOAA Site No.	TPA Site No.	Site Name	Drums	Surface Debris	Solid Waste	Soil	Ground-water	Surface Water	UST/AST/Pipeline	Clean Closure	Site Conditions as of August 6, 2008	Site Status as of September 26, 2008	Property Owner(s) as of August 2008
4	4	Active Landfill	X	X	X	X					Municipal solid waste (MSW) capped with geosynthetic clay and scoria throughout most of the landfill footprint; MSW open burning was conducted post-closure in the southern portion of the footprint until 2006 when this area and much of the rest of the landfill footprint was capped with petroleum-contaminated soil (PCS) from various Two-Party Agreement sites. DRO, GRO, residual range organics (RRO), benzene, toluene, ethylbenzene, and total xylenes are potential PCS cap contaminants. City of St. George is responsible for post-closure monitoring. Deed notice.	NFRAP 01/13/04 (City bears liability for long-term monitoring and O&M)	City of St. George
5	5	Ocean Dump Site		X						X		NFRAP 03/11/03	Tanaq; The Aleut Corporation (TAC)
6	6	Open Pits Site	X	X	X	X					DRO contaminated soil remains beyond 15 feet bgs at the coal subsite, and at refusal depth at the crane and coal subsites. Deed notice.	NFRAP 08/08/05	City of St. George
7	7	Ballfield/Former Landfill	X	X	X	X	X	X			MSW capped with scoria. Lead-contaminated soil remains at the north-northeast end of the landfill, beneath the 2 foot thick scoria cap. DRO contaminated soil can be found in areas at greater than 6 feet bgs; post-closure cap monitoring and maintenance until July 2010. Deed notice.	NFRAP 01/09/06	City of St. George
8	8	Active Power Plant				X			X		DRO contaminated soil remains adjacent to and beneath the City Municipal Building and at refusal to the south of the building; deed notice; groundwater at the site is contaminated with DRO; see Site 35 below for information. Deed Notice.	NFRAP 08/31/05	City of St. George
9	9	Old Power Plant				X			X		DRO contaminated soil remains near buried utilities, adjacent to and beneath the Old Power Plant building foundation, abutting a cliff to the north, and at equipment refusal encountered at between 1.5 and 4 feet bgs. RRO remains in an area next to the building foundation on the west side. Deed notice.	NFRAP 09/22/05	St. George Community Council
10	10	Former Drum/AST Storage Area	X						X	X		NFRAP 08/18/97	Tanaq/TAC

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11	11	Cottage C UST (Active Federal Facility)				X			X		DRO contaminated soil remains adjacent to the building and buried utilities at the south end of the building; this active NOAA facility was inadvertently included on the Two-Party Agreement list of sites in 1996. ADEC concurred that this site would be removed from the TPA, and would fall under NOAA NMFS responsibilities for complying with State of Alaska laws and regulations.	NFRAP 02/05/04	NOAA
12	12	Former Hangar Bldg.	X	X		X				X		NFRAP 03/11/03	City of St. George
13	13	Makushin Pit	X							X		NFRAP 08/18/97	Tanaq/TAC
14	14	Oil Drum Dump	X	X		X					DRO and RRO contaminated soil remains at refusal depths of 4 to 11 feet bgs. Deed notice.	NFRAP 11/17/04	Tanaq/TAC
15	15	Boneyard B	X	X		X			X	X		NFRAP 02/11/05	Tanaq/TAC
16	16	Boneyard C	X	X						X		NFRAP 09/14/04	Tanaq/TAC
17	17	Cross-Hill Dump	X							X		NFRAP 08/18/97	Tanaq/TAC
18	18	Former Fuel Storage Area	X			X					DRO contaminated soil remains adjacent to the roads, a buried electrical line, and at refusal depths of 10 to 11 feet bgs. Deed notice.	NFRAP 04/18/05	Tanaq/TAC
19	19	Old Carpenters Shop				X					Lead-contaminated soil remains in one location at the southeast corner of the buried foundation at a refusal depth of 8.5 feet bgs. Deed notice	NFRAP 01/25/06	Tanaq/TAC
20	20	Old Coal House		X		X				X		NFRAP 09/09/97	Tanaq
21	21	Abandoned City Diesel Tank Disposal Site							X	X		NFRAP 03/11/03	City of St. George
22	22-1	School UST				X			X		DRO contaminated soil remains adjacent to the southwest corner of the school at a refusal depth of approximately 9 feet bgs, and potentially beneath the school building. Deed restriction to future landowner (State of Alaska).	NFRAP 04/08/04; NFRAP 02/11/05	NOAA
23	22-2	Current Carpenter Shop USTs				X			X		DRO contaminated soil remains adjacent the east end of the Carpenter Shop building where further excavation could jeopardize foundation stability, and at depth exceeding 15 feet bgs. Deed notice.	NFRAP 08/19/03	Tanaq/TAC

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24	22-3	Shop/Store UST				X			X		DRO contaminated soil remains near northwest corner of the building's foundation, near a cliff edge and at refusal depths of 7 to 14 feet bgs. Deed notice.	NFRAP 10/08/04	Tanaq/TAC
25	22-4	Old Airport Hangar UST		X		X			X	X		NFRAP 03/10/03	City of St. George
26	22-5	Gas Station #1 UST				X			X	X		NFRAP 03/10/03	Tanaq
27	23	Abandoned Diesel Tank Farm				X			X		DRO contaminated soil remains at concentrations greater than ADEC's cleanup levels for the protection of groundwater at refusal depths varying between 4.5 and 16 feet bgs and in some locations shallower than refusal at depths varying between 2.5 and 9.1 feet bgs. Results from six groundwater monitoring events indicated groundwater was not impacted by this soil contamination. Residual PCS concentrations are less than ADEC's cleanup levels for ingestion and inhalation. Deed notice.	NFRAP 02/28/05	Tanaq/TAC
28	24	Inactive Gas Tank Farm				X			X		DRO, GRO, Toluene, Ethylbenzene, and total xylenes contaminated soil remains at refusal depths varying between 9.6 and 16.5 feet bgs. Deed notice.	NFRAP 12/14/04	City of St. George; Tanaq
29	25-1	Port Fuel Supply Line E-W				X			X		DRO contaminated soil remains in one location at a refusal depth of 11 feet bgs, and in an unexcavated buffer zone along the Bering Sea from the beach line inland approximately 10 to 15 feet at depths 6 feet bgs or greater. Deed notice.	NFRAP 12/18/07	City of St. George; Tanaq; TAC
30	25-2	Port Fuel Supply Line N-S				X			X		DRO contaminated soil remains at equipment refusal depths varying from 3 to 10 bgs. Deed notice.	NFRAP 05/05/05	Tanaq
31	NTPA	St. George Schoolyard/landfill	X		X						PCE was detected in 1994 in one sample from 12 feet bgs at a concentration slightly above current ADEC Method Two criteria for migration to groundwater. Capped MSW may remain in areas not exposed after landfill operations ceased (date unknown); deed restriction to future landowner (State of Alaska).	NFRAP 11/21/95	NOAA
32	NTPA	Petroleum Contaminated Stockpile				X						NFRAP 01/08/08	NOAA

NOAA Site No.	TPA Site No.	Site Name	Drums	Surface Debris	Solid Waste	Soil	Ground-water	Surface Water	UST/AST/Pipeline	Clean Closure	Site Conditions as of August 6, 2008	Site Status as of September 26, 2008	Property Owner(s) as of August 2008
33	NTPA	School AST				X			X	X		NFRAP 5/24/05, NFRAP 6/20/2005	NOAA
34	NTPA	Public Health Service PCS –Open Pits Site				X				X		NFRAP 2/11/05	City of St. George/TAC
35	8b	Active Power Plant Free Phase					X				Groundwater is contaminated with free-phase and dissolved-phase DRO. Long-term groundwater monitoring is in progress, and a free-phase extraction system started removing product in September 2007. Deed notice.	NFRAP 09/18/08	City of St. George
36	1b & 25-1b	Oceanfront Sites Free Phase					X				Petroleum sheen observed on the water table surface during excavation activities in 2006. Dissolved-phase contaminants include DRO, GRO, and benzene. Long-term groundwater monitoring is in progress.	NFRAP 11/2/07	City of St. George; Tanaq

Notes:

- AST: Above ground storage tank
- DRO: Diesel-range organics
- FUDS: Formerly Used Defense Site
- NFRAP: No Further Remedial Action Planned (received from State of Alaska Department of Environmental Conservation)
- NMFS: National Marine Fisheries Service
- NOAA: National Oceanic and Atmospheric Administration
- NTPA: Non Two-Party Agreement site
- PCS: Petroleum-contaminated soil
- TAC: The Aleut Corporation (subsurface estate)
- Tanaq: St. George Tanaq Corporation (surface estate)
- TPA: Two-Party Agreement
- UST: Underground storage tank