



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE

Contaminated Sites Program

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September 18, 2019

Mr. Larry Beck
Bureau of Land Management
4700 BLM Road
Anchorage, Alaska 99507

Re: Approval of 2019 Petroleum-Contaminated Soil Landspread Monitoring Report
Red Devil Mine, Red Devil

Dear Mr. Beck:

The Alaska Department of Environmental Conservation (DEC) has reviewed the *2019 Maintenance and Monitoring Report* for the Contaminated Soil Landspread Area at the Red Devil Mine, prepared by Environmental Management, Inc. and dated September 11, 2019. This report is approved in accordance with 18 Alaska Administrative Code (AAC) 75.380.

In 2010, the Bureau of Land Management (BLM) established an unlined petroleum-contaminated soil landspread area to treat contaminated soil from several locations at the Red Devil Mine site. Four (4) decision units (DU1, DU3, DU5 and DU6) were created with the original 1,945 cubic yards of soil from the former bulk fuel tanks and pipeline area. In 2011, 300 cubic yards of petroleum-contaminated soil was excavated from the box spill area and placed in DU4. The approved cleanup level for diesel range organics (DRO) is 250 milligrams per kilogram (mg/kg). In 2013, the analytical sample result showed that DRO concentrations from DU5 were below the cleanup level, and, in 2014, BLM excavated an additional 250 cubic yards of petroleum-contaminated soil from the box spill area and placed it in DU5. Monitoring samples collected in 2014 and 2017 showed that DRO concentrations were below the approved cleanup levels in DU1 and DU3, respectively.

As documented in the *2019 Maintenance and Monitoring Report*, in July 2019, BLM collected monitoring samples from DU4, DU5, and DU6. Consistent with previous sampling events, BLM used the incremental sampling methodology (ISM) and collected 36 sub-samples across each the gridded cell in order to create a primary bulk sample. For quality assurance and quality control (QA/QC) purposes, in DU4, duplicate and triplicate samples were collected using the same process. The sample results showed that the DRO concentrations in DU6 are below the approved cleanup level, but the DRO concentrations in DU4 and DU5 are above the cleanup level.

Determination


DEC hereby determines that no additional action is required in regards to the soil in DU6 as the soil contamination has been cleaned up to concentrations below cleanup levels suitable for residential land use. Cleanup is complete as long as no new information becomes available that indicates residual contamination may pose an unacceptable risk and the soil remains on-site. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that the contamination poses an unacceptable risk to human health or to the environment.

Additional action is required for the soils in DU4 and DU5, as well as the remaining in-situ contaminated soil at the box spill.

Please contact me if you have any questions or concerns about this site.

Sincerely,



Anne Marie Palmieri
Environmental Program Specialist

Electronic cc:

Andy Colson, EMI
Mike McCrum, BLM