



United States Department of the Interior



FISH AND WILDLIFE SERVICE
1011 E. Tudor Rd.
Anchorage, Alaska 99503

IN REPLY REFER TO:

DEC

JAN 21 1992

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DEPARTMENT OF THE INTERIOR
ENVIRONMENTAL PROTECTION AGENCY
JAN 16 1992

U.S. Environmental Protection Agency, Region 10
Mr. Phillip G. Millam
Chief, Superfund Branch
Attn: HW-113
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Millam:

The U.S. Fish and Wildlife Service (Service) received your letter of January 7, 1992, requesting a Preliminary Assessment for the Kenai National Wildlife Refuge (Refuge).

After discussions with Mr. Mark Ader of your office, my staff has determined that you are requesting a Preliminary Assessment for the Polychlorinated Biphenyl (PCB) spill at the Swanson River Oil Field in the Refuge. The Service is surprised by this apparent change in the Environmental Protection Agency (EPA), Region 10 Superfund Program policy.

During the original negotiations for cleanup at the Swanson River Oil Field, the EPA determined that the spill did not qualify as a Superfund site (personal communication, Mr. Douglas Johnson, U.S. Army Sixth Infantry (Light), formerly of the EPA Anchorage Operations Office).

Since the EPA Superfund Office declined to be involved with cleanup, this project was conducted under an Order by Consent signed by Chevron Inc., the Service, the Bureau of Land Management (BLM) and the Alaska Department of Environmental Conservation (ADEC) (see enclosure). Furthermore, in order to assure that the EPA was involved in the cleanup, a Toxic Substance Control Act (TSCA) order was issued for the cleanup.

The Service and other signatories of the Order by Consent have worked with the EPA during the cleanup, to ensure compliance with all applicable regulations. Furthermore, an EPA representative has attended all meetings concerning the cleanup and the EPA Anchorage Operations Office has copies of all correspondence, agreements and data produced during this cleanup.

Therefore, we submit that requiring the Service to produce data to be used to rank the Swanson River Oil Field for inclusion on the Superfund National Priority List at this late date is counterproductive. Ranking the site serves no purpose as the cleanup is nearly completed under an Order by Consent. The EPA has previously agreed to cleanup concentrations, has issued a TSCA Order for the cleanup, and has participated in all decisions concerning this action. In addition, the EPA Anchorage Field Office has copies of all the data

produced before and during the cleanup and, therefore, already has data needed for the ranking.

In view of the above, the Service respectfully declines to submit the data requested by your letter.

If you have any questions about this matter, please contact Everett Robinson-Wilson at (907) 786-3493 commercial or 869-3493 FTS.

Sincerely,

Walter O. Stieglitz

Regional Director

Enclosure

cc: Mr. Alvin Ewing, EPA Alaska Operations Office
Mr. Doug Johnson, U.S. Army Sixth Infantry (Light)
Mr. Joseph Dygas, BLM
Mr. Jim Ives, ARCO Alaska Inc.
Mr. Sven Brandt-Erichson, ADEC, Anchorage
Manager, Kenai National Wildlife Refuge
Director, Division of Environmental Contaminants, Washington, D.C.