Work Plan

Time-Critical Removal
North River *Former* Radio Relay Site, Alaska
April 2004

Prepared for:
611 CES/CEVR
Elmendorf AFB, Alaska

Preface

This work plan describes the activities planned to accomplish a time-critical removal of PCB and POL contaminated soil and investigation of possible vegetation contamination at the North River Radio Relay Site (RRS) (figures 1&2). The 2004 project tasks will consist of contaminated soil removal, additional soil and vegetation sampling to further define the extent of contamination and assure that all contaminated materials are removed, and restoration of the land surface by backfilling with clean soil. This work is a continuation of excavation and investigation begun in 2003.

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Introduction

Background

This project began with the identification in June 2002 by the U.S. Army Corps of Engineers (USACE) of three drums of unknown product in a location outside the area where a USACE contractor was removing approximately 3300 drums. In August 2002 the possibility of more drums existing in the vicinity of these three was reported (Patrice Buck, AKDEC, personal communication). Because of the potential for environmental contamination, USAF conducted a time-critical removal of the drums and 25 cubic yards of POL-contaminated soil in 2003 from area B (figure 3). Four soil samples, taken from the vicinity of the drums, indicated that the soil remains contaminated (DRO/RRO).

During the investigation of drums two other areas of possible contamination were discovered (Areas A & C). Further investigation identified an area of high concentration PCB contamination in soil and associated low-concentration areas (Area C). A separate area (Area A) of POL and PCB contaminated soil was identified and partially delineated. One-hundred-eighty-one soil, surface wipe, vegetation, and oil samples were collected from areas A and C to identify the nature and extent of contamination at the site. Analysis of these samples indicated that these two areas remain contaminated. Area A contains approximately 175 cu yd of soil contaminated with PCB (Aroclor 1260) and 6 cu yd of soil contaminated with POL (DRO/RRO). Area C contains approximately 220 cu yd of soil contaminated with PCB (Aroclor 1260).

Project goals for 2004 are removal of all identified PCB- and POL-contaminated soil, sampling of soil and vegetation to document cleanup, and backfilling of the excavated areas to original grade with clean fill. This project is a continuation of work done in 2003 (U.S. Air Force, 2002; U.S. Air Force, 2004(a)).

Time-Critical Removals

CERCLA Section 104(a)(1) describes time critical removals. These are actions that can be planned in less than 6 months and have the following characteristics:

- A release or threat of release requires near-term action.
- The required response is fairly obvious and straightforward.
- Temporary or final waste management capacity is available.

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) also provides a bias for early action.

Site Description

The Native Village of Unalakleet, Alaska, is located on the shores of the Norton Sound, on the west coast of Alaska, approximately 400 miles northwest of Anchorage (figure 1). The former North River RRS was located on a hilltop about 7 miles, by road, southeast of and overlooking Norton Sound and Unalakleet (figure 2). The RRS is accessed by an un-maintained gravel road from Unalakleet. The land is an open, level field on the hilltop. Vegetation is tundra.

The soil removal sites are approximately 1/2 mile from the former USAF North River RRS site, between the North River bridge and the USAF former site.

Wildlife in the Unalakleet area includes moose, caribou, bear, fox, and nesting birds (including osprey and bald eagles).
After the station was dismantled and razed in 1995, the land had been used for subsistence food gathering, specifically hunting. For recreation, the high hilltop location is occasionally visited to view the area.

A Notice of Intention to Relinquish the Unalakleet Aircraft Control and Warning (AC&W) site was filed with the Bureau of Land Management (BLM) on 9 February 1970. On 1 December 1970, 618.01 acres were reported excess to General Services Administration (GSA) which subsequently retransferred the acreage to BLM for disposal. The former site is currently under the jurisdiction of BLM, subject to a village selection application by the Unalakleet Native Corporation.

Site History

From 1958 to 1978, the USAF operated an AC&W station and the North River Radio Relay Station (RRS) near Unalakleet. As a result of these military activities, buildings, debris, and thousands of 55-gallon fuel drums were left in the area.

Investigative, remedial and restoration projects for all Formerly Used Defense Sites (FUDS) in Unalakleet, Alaska by the United States Air Force (USAF) and the USACE Alaska District have occurred during 1984-1986, 1989, 1993, 1995, and 1999-2002.

In 1984 and 1985, hazardous and toxic wastes were removed from the Unalakleet AC&W Site by the Department of the Air Force.

In 1986, the USACE Alaska District investigated the site and published three sampling reports in 1989. An inventory report was published by Woodward-Clyde in March 1986.

In 1989, a Remedial Investigation (RI)/Feasibility Study was conducted, with options to include design work.

In 1993 and 1995, two USACE contractors demolished buildings at the Unalakleet AC&W Site and the North River RRS and buried all debris in an on-site landfill. However, according to the USACE Trip Report dated 10 July 2001, these cleanup projects did not dispose of all the fuel drums and miscellaneous debris scattered in the vicinity of Unalakleet.

In 2001, the USACE performed a preliminary investigation of the sites that reportedly had fuels drums or debris. “Of 15 sites investigated, based on sample results and the site inspection, the team determined that six sites or areas had debris and contamination that could be cleaned up under DERP-FUDS.”

In 2002, a USACE contractor removed approximately 3,300 drums scattered in various areas across a 10 square mile area on ANCSA property as well as several Native allotments near Unalakleet.

In 2003 USAF 611CES/CEVO activities consisted of soil removal in the vicinity of the removed drums at area B (figure 3), removal of drums and some soil from area A, minor soil removal and sampling of PCB contaminated soil at the area C, and later full scale removal of 7.5 cubic yards of soil from area C (USAF, 2004, *in draft*).

Current Project

The objective of this project is to mitigate the potential for spread of contamination from soil contaminated with PCB and POL. Each major task is described below. Provisions for PPE and other health and safety issues are addressed in the Site Health and Safety Plan. The 611 CES/CEVO will plan, construct, operate, maintain, and decommission temporary storage facilities for excavated soil and drum related materials and wastewater.

All activities shall be planned and implemented in a manner that protects existing site utilities, structures, surface features, service operations, environment, and health and safety. This includes the protection of trees, and other vegetation not in the excavation zone from dust damage, compaction of soil, and physical hazards. All reasonable measures will be taken to minimize and suppress fugitive emissions of dust, vapors, decontamination water, and other materials during excavation. The soil is damp and excavation will probably reach permafrost, so dust emission is not expected. If blowing dust is visible, operations will be curtailed. Decontamination will be conducted in a pit consisting of a thick hypalon lining and soil bermed edges. Decontamination fluids will be retained in this area and collected. Some diesel fuel may be used to remove PCB contamination on machinery. This will be applied by brush or cloth and will be collected before reaching the pit floor. Steam or high pressure hot water will be used for final decontamination of equipment. This water will be collected in the pit, pumped to storage tanks, filtered through granulated, activated carbon, and reused.

Drums will be transported and stored on wooden pallets. Soil supersacks will be marked and stored in “Conex” type shipping containers. All containers will be labeled with the numbers of the supersacks they contain and the total weight. All drums and shipping containers will be properly labeled with ADEC & DOT acceptable labeling including container number, contents, and handling information. The drum and container storage area will be secured and signed to prevent access to unauthorized personnel.

The general sequence of work planned is:

- Minimal mobilization to main road at Area A
- Sample main road between Area A and previous samples on the road at Area C and excavate soil from areas with PCB contamination
- Complete mobilization and setup at West side of Area C
- Removal of clean soil cap and liner on the main road and trail, excavation, sampling, and backfill of contaminated soil area on the main road and first 100’ of the trail
- Excavation of contaminated soil, sampling, and backfill of the last 400’ of trail

- Excavation of contaminated soil, sampling, and backfill of the "hot spot" area
- Decontamination of equipment
- Excavation of contaminated soil, sampling, and backfill of Area A
- Sample previously excavated sites in Area B, excavation of identified contaminated soil, confirmation sampling, backfill
- Decontamination and demobilization

Soil and Vegetation Removal

U.S. Air Force 611 Civil Engineer Squadron Environmental Operations Section (611 CES/CEVO) will remove contaminated soil from two areas (areas A and C, figure 3). Soil removal will be accomplished using a track mounted excavator and hand tools. Soil will be placed in 1 cubic yard "supersacks" (<50ppm PCB) or new metal open-top 50-gallon drums (>50ppm PCB). The supersacks will be placed in sea vans. Sea vans and drums will be staged in Unalakleet and shipped by barge or airplane to Defense Reutilization and Marketing Organization (DRMO) or directly to a disposal facility. Confirmatory samples will then be collected as described below and in the Sampling and Analysis Plan.

Vegetation removed from the surface over the excavated areas and any other vegetation identified as potentially contaminated will be chipped and placed in 1-cubic yard "supersacks".

Area A

This area contains separate areas of PCB- and POL-contaminated soils. POL-contaminated soils will be removed first because they are closer to the road. These soils will be sampled as excavation progresses, to assure that no PCB contamination is included in this excavation. PCB-contaminated soil in the vicinity of 2003 sample #5 will be removed separately after the boundaries of this small area are established by sampling. Approximately 180 cubic yards of soil will be excavated.

This area is densely vegetated. An unknown volume of vegetation over the PCB-contaminated area will removed, chipped and treated as low level (<50ppm) PCB-contaminated material.

Area B

This is the location of the 2002 drum discovery. Soil was removed in 2002 as described above, but POL-contaminated soil probably remains. If sampling identifies remaining contaminated soil, this will be removed and handled as with area A & C.

Area C

In this area, the initial task will be removal of liner and clean fill placed over contaminated surfaces on the main road and first 100' of the trail in 2003. The fill will be removed by scraping with excavator and hand tools. This material will be placed in a stockpile for later use. The liner will be removed and disposed in supersacks. Identified contaminated soil in this area will then be removed. The excavation will be sampled and if verified clean will be filled with clean soil. Contaminated soil will be removed from the trail and hot spot. The entire excavation will then be sampled, as described below, to confirm cleanup and the

excavation backfilled with clean fill. An estimated 70 cubic yards of soil with PCB>50ppm and 150 cubic yards with PCB<50ppm will be excavated.

The fence, installed outside the contaminated area in 2003, will be removed as necessary and reused.

Sampling

Sample acquisition, handling, analysis, and quality control are described in the Sampling and Analysis Plan.

Field screening will be conducted using one of two methods. For PCB sampling, an on-site mobile laboratory provided by SGS/CT&E Environmental Services will be used to provide 24-hour turn-around analyses. Dexcil Clor-n-Soil or a similar field screen technique may also be used on occasion. Dexcil PetroFLAG or a similar field screening tool will be used to determine when excavation in POL contaminated areas is likely to be sufficient.

For confirmation that all soil exceeding cleanup goals has been removed, samples will be collected for analysis at an ADEC approved laboratory (SGS CTE Environmental Services, Inc). All samples will be collected using ADEC guidelines.

Sample locations will be marked by pin flags and the location recorded using GPS. Sample material characteristics and any other pertinent information will be recorded in a field notebook.

Area A

Excavated areas determined to be vacant of soils above cleanup goals will be sampled on a regular grid and these samples analyzed at an ADEC approved lab for contaminants of concern.

Area B

Soil in the area excavated in 2002 will be sampled for confirmation of cleanup. Samples will be analyzed for DRO/RRO, PCB, and 8270SIMS.

Area C

Excavated areas determined to be vacant of soils above cleanup goals will be sampled on a regular grid and these samples analyzed at an ADEC approved lab for contaminants of concern (primarily PCB).

Soil and vegetation sampling for non-excavated areas is described in the Site Investigation section (p.8).

Estimated Number of Samples	Type of Analysis	Purpose of Analysis
400-600	PCB by on-site laboratory	Guide excavation
400	PCB by ADEC approved laboratory	Confirmation of cleanup
100	POL by PetroFlag	Guide excavation
75	DRO/RRO by ADEC approved laboratory	Confirmation of cleanup
80	8270 PAH SIM	Confirmation of cleanup
100	Vegetation PCB	Site Characterization

Data Quality Objectives

A summary of the objectives for this project are presented in Table 1. A complete description of planned sampling and analysis is presented in the Sampling and Analysis Plan (SAP) which is attached. The SAP includes the Field Sampling Plan (FSP) and the Quality Assurance Project Plan (QAPP). The FSP defines the general sampling procedures to be followed and includes project analytical DQO's. Projected sample frequency, sample handling and documentation are also described. The QAPP describes the analytical methods to be used as well as methods for verifying sample analysis validity.

Table 1. Project Data Quality Objectives

Objective	Data to be Collected	Analytes of Concern	Data Use	Decision Criteria
Identify area to be excavated	Soil analytical samples	PCB, DRO, RRO	Determine area to be excavated and analytes of concern for confirmation sampling	Areas represented by samples with analyses above cleanup goals (see below) will be excavated.
Excavate PCB-contaminated soil	Samples for analysis by portable lab	PCB	Determine areas where continued excavation or confirmation sampling is needed	PCB analyses below 1.0 mg/kg indicate sufficient excavation of contaminated soil.
Excavate POL-contaminated soil	PetroFLAG screening	Total Hydrocarbons	Determine areas where continued excavation or confirmation sampling is needed	PetroFLAG values below 250 mg/kg indicate complete excavation of POL.
Confirm complete excavation	Soil Analytical samples	DRO/RRO, PCB, as indicated by initial sampling	Samples will confirm that remaining soil contains no POL or PCB above cleanup goals	18AAC 75 Less than 40" migration-to-groundwater, PCB less than 1.0 PPM

Soil Cleanup Goals

Project cleanup goals for areas A, B and C are taken from 18AAC 75 Method 2, Table 2, Less-than-40-inch Migration to Groundwater. These are:

Analyte	Cleanup Goal (mg/kg)
DRO (C_{10}-C_{25})using AK 102	250
RRO (C_{25}-C_{36}) using AK 103	11000
PCB (Aroclor 1260)	1.0

Site Investigation

611 CES/CEVO personnel will investigate the possibility of soil contamination outside the road and trail surfaces and the possibility of vegetation contamination near PCB contaminated soil on and around the trail to a native allotment in area C.

Soil samples will be collected approximately every 50 feet along the edge of the road and trail, and within 20 feet of the centerline, to verify that contamination is confined to the road surface itself. Vegetation samples will also be taken along the side of the road and trail to determine if these plants have taken up PCB. Specifically, the vegetation sampled will be berry bushes, berries, willow, birch or alder, and any other vegetation that could, if contaminated, affect unrestricted use of the area. Sample interval for vegetation will not necessarily be consistent, being governed by vegetation distribution. Vegetation samples will be taken within 25 feet of the road. Soil samples will be analyzed at the on-site laboratory; vegetation samples will be submitted for laboratory analysis.

Additional soil samples will be taken in the vicinity of drums removed from area B in 2002 (near samples UNK22554SOIL003 and UNK22554SOIL004) to determine whether all contaminated soil has been removed from this site.

Investigation Derived Waste

Investigation derived wastes (IDW) anticipated for this project include disposable PPE, decontamination fuel oil, pads, and water, disposable sampling tools, bags and expendable field test supplies. All IDW solids will be placed in open-top drums, lidded, and shipped by barge to an appropriate subtitle D landfill (probably Chemical Waste Management Inc., Columbia Ridge facility. Decontamination water will be treated in a granulated activated carbon (GAC) system, tested for contaminants and discharged. The anticipated quantity of IDW water is 1000 gallons. Water samples will be analyzed by the following methods:

Analyte	Method	MDL	PQL
PCB	SW8082	.031 µg/L	1.0 µg/L
VOC	SW8260A	0.31 µg/L	0.1 µg/L
SVOC	SW8270 SIMS	3.1 µg/L	10 µg/L

MDL = minimum detection limit
PQL = practical quantitation limit

All water will be held in 300 gallon tanks until analyses are received from the lab. Any water containing constituents greater than the PQL will be drummed and flown to DRMO at Elmendorf AFB for disposal. All water containing constituents less than the PQL will be discharged to the land surface in the vicinity of the decontamination area which is on high, flat ground more than 1000 feet from any water body.

Schedule

Soil removal and site investigation is expected to begin in mid-June 2004 and is anticipated to last for two to three months. The first task will be excavation, sampling and backfilling of the main road and first 100' of the trail in Area C. After this is accomplished, a staging area and decontamination area will be established west of the contaminated area. Excavation of the contaminated soil on the trail is projected to begin at the cabin end in order to remove lower concentration material first. Excavation is expected to proceed toward the hot spot and final excavation will be at this location.

After staging area and decontamination area setup at Area C, a small staging and decontamination area will be set up at Area A. After Area C excavation is complete and equipment is decontaminated, contaminated soils in Area A will be removed. While this area is excavated, Area B will be sampled to determine whether contaminated soils remain. If contaminated soil remains in area B, it will be removed after excavation in Area A is complete. After confirmation sampling, all areas will be backfilled with clean fill.

Report

A summary of field activities and copies of sample analyses and sample location maps will be submitted to 611 CEVR and ADEC by March 30, 2005.

References

CH_2MHILL, 1994 *Preliminary Assessment, North River*, United States Air Force, 11th Air Control Wing, 11th Civil Engineering Operations Squadron, January 1984

EPA, 1986 *Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup*, United States Environmental Protection Agency 560/5-86-017, May, 1986

Sloan, Charles E., et al. *Hydrologic Reconnaissance of the Unalakleet River Basin, Alaska, 1982 to 1983.* U.S. Geological Survey Water Resources Investigation Report 86-4089. 1986.

U.S Air Force, 2002 *Work Plan Time-Critical Removal North River (former) Radio Relay Site, Alaska,* 611 Civil Engineering Squadron, Elmendorf AFB, AK, May 2003

U.S Air Force, 2004(a) *Time-Critical Removal, North River (former) Radio Relay Site, Alaska*, 611 Civil Engineering Squadron, Elmendorf AFB, AK, *in draft*

U.S Air Force, 2004(b) *Sampling and Analysis, Plan North River RRS 2004*, 611 Civil Engineering Squadron, Elmendorf AFB, AK, *in draft*

U.S Air Force, 2004(c) *Health and Safety Plan, North River RRS 2004*, 611 Civil Engineering Squadron, Elmendorf AFB, AK, *in progress*

Figures

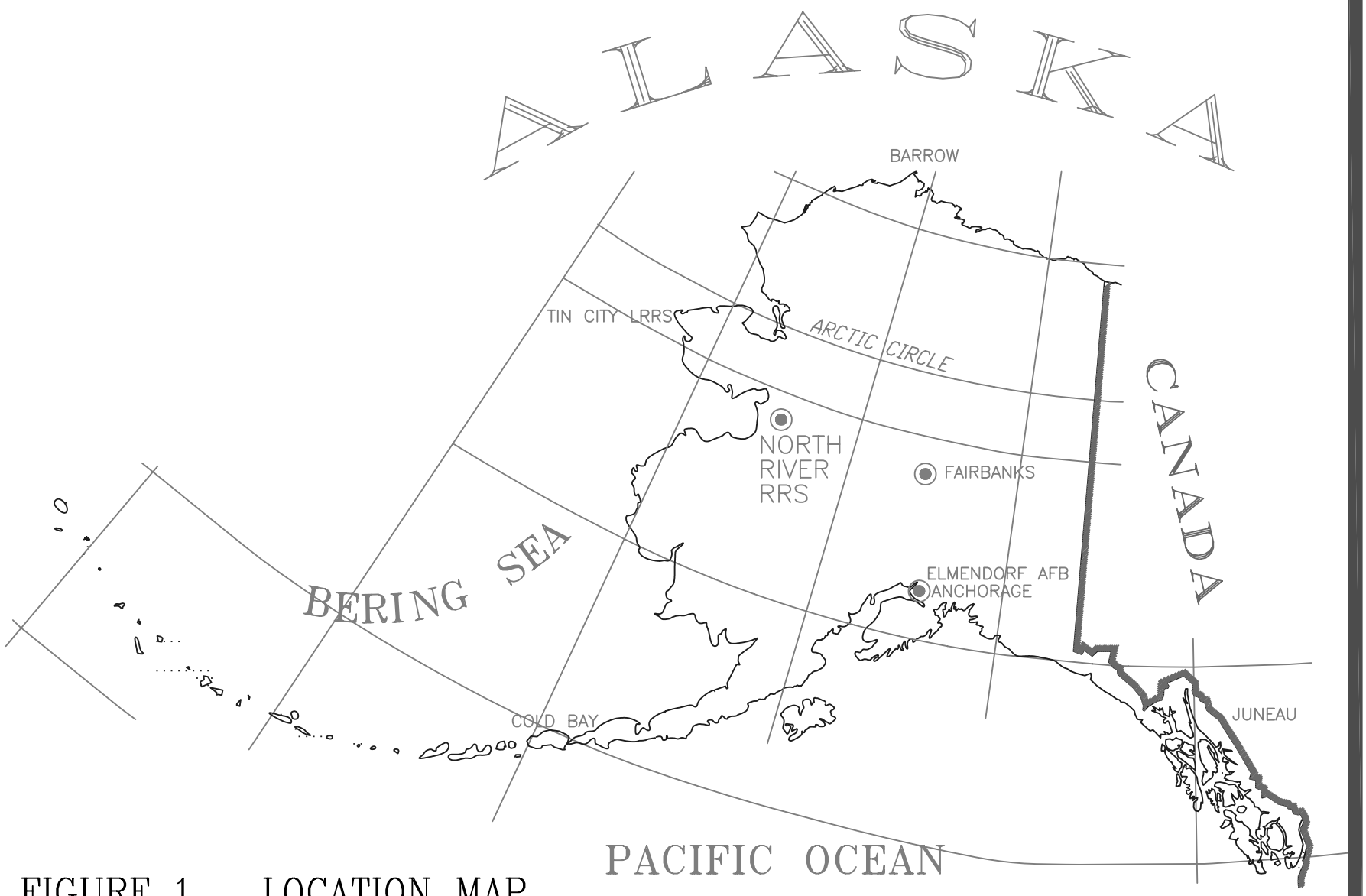
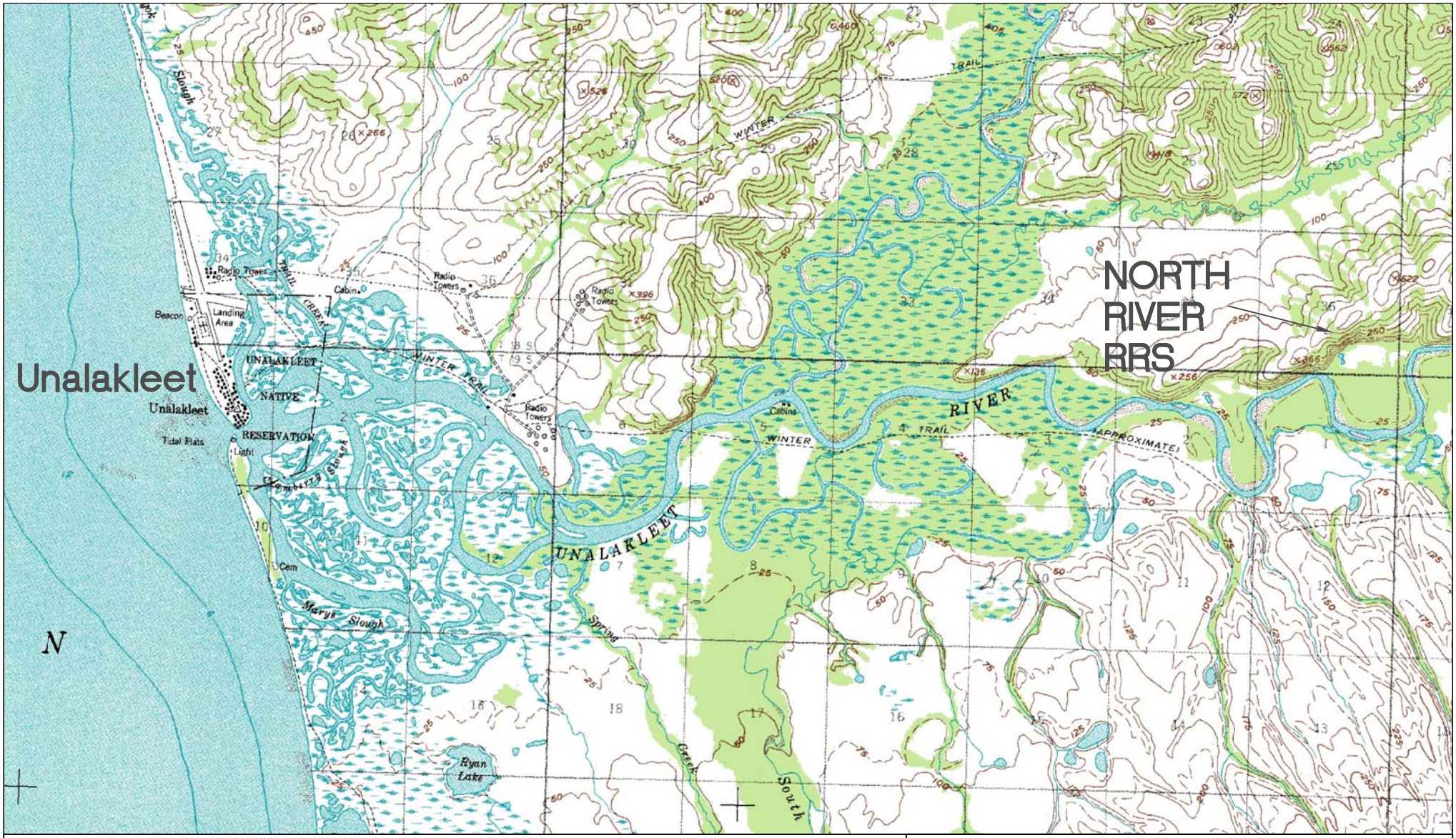


FIGURE 1 LOCATION MAP



NORTH

FIGURE 2

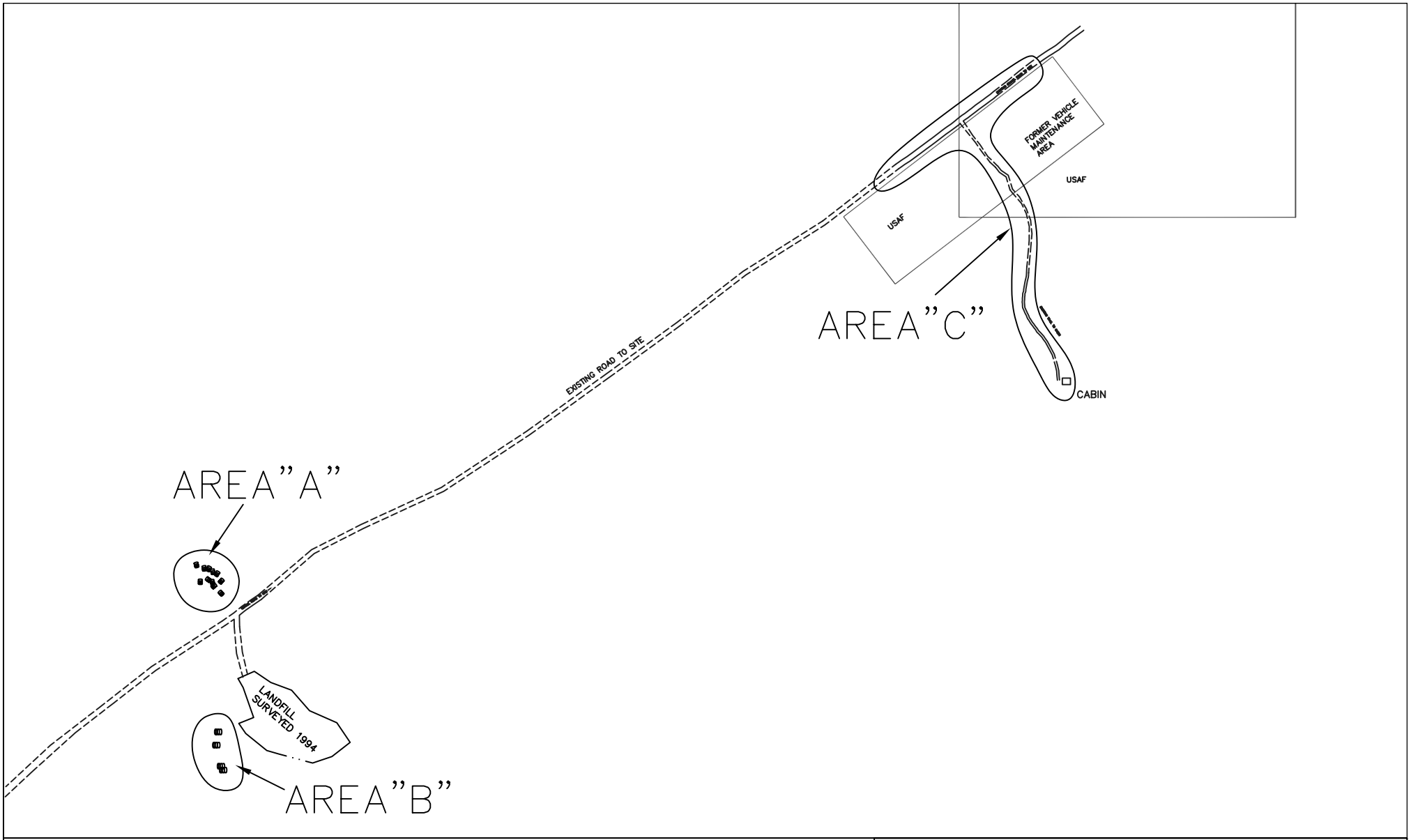
DEPARTMENT OF THE AIR FORCE
611th CIVIL ENGINEER SQUADRON
ELMENDORF AFB ALASKA 99506

611 CES
PRIDE IN PROGRESS

NORTH RIVER RRS, ALASKA

VICINITY MAP

PROJECT DATE:	SCALE:	DRAWING DATE:
SEP 2003	1"=APPROX. MILE	OCT 03
DRAWN BY:	FIELD DATE:	FIGURE No.:
JCB	SEP 03	2



LEGEND:

EXISTING DRUM REMOVED

GRAPHIC SCALE

150 0 75 150 300 600

(IN FEET)
1 inch = 300 ft.

NORTH

FIGURE 3

DEPARTMENT OF THE AIR FORCE
611th CIVIL ENGINEER SQUADRON
ELMENDORF AFB ALASKA 99506

611 CES
PRIDE IN PROGRESS

NORTH RIVER RRS, ALASKA

AREAS A, B, and C
SITE MAP

PROJECT DATE:	SCALE:	DRAWING DATE:
AUG\SEP 2003	1"=300'	OCT 03
DRAWN BY:	FIELD DATE:	FIGURE No.:
JCB	AUG\SEP 03	3

Appendix

610 University Avenue
Fairbanks, AK 99709-3643
PHONE: (907) 451-2181
FAX: (907) 451-5105
http://www.state.ak.us/dec/

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

File: 630.38.001

March 1, 2004

Mr. Douglas Wootten
USAF 611th CES/CEVR
10471 20th Street, Suite 348
Elmendorf AFB, AK 99506-2270

Re: Review Comments on:
1. Draft Work Plan-Time Critical Removal North River RRS (dated May 2004);
2. Draft Sampling and Analysis Plan North River RRS 2004

Dear Mr. Wootten:

The Alaska Department of Environmental Conservation (DEC or the Department) has completed review of the above-mentioned documents, which were received on February 18, 2004 via e-mail. The plans describe field work and sampling to be done at the North River site during the summer of 2004. DEC offers the following comments on these documents.

General

1. Please number the pages of these documents.
2. Please include a schedule for the 2004 project.
3. Please provide a waste management plan for handling, transporting, and disposing of investigation-derived waste.

Draft Work Plan-Time Critical Removal North River RRS

4. Preface. Please provide more explanation of how this work plan ties into the work that was done last summer. More detailed information is needed to describe this summer's work including:
    a. Description of how the geotech material and soil placed on the main road last summer will be removed.
    b. Please mention that the fence will be removed. Will the fence be decontaminated and reused?
    c. Description of how sampling will be done on the sides of the trail leading to the cabin.
5. Preface. Add to the first paragraph that Area B soil will be sampled to confirm all contamination has been removed. Also, in this section it would be helpful to describe the kinds of contamination found (i.e., PCBs).
6. Introduction. Please identify what "GSA" stands for.

7. Site History. The last paragraph states "In 2002 and 2003, a USACE contractor removed approximately 3,300 drums…" The drum removal by the United States Corps of Engineers (USACE) was actually done in 2002 only. Soil, contaminated by leaking drums is scheduled to be removed by the USACE contractor in 2004. Please change the text to accurately reflect the cleanup schedule.
8. Site History. It would be helpful for the reader to provide a summary of the 2003 PCB cleanup in this section because it is directly related to this summer's planned activities. (see comment 4)
9. Current Projects. You stated that "Reasonable measures will be taken to minimize and suppress fugitive emissions of dust, vapors, decontamination of water, and other materials during excavation." Please describe what specific measures will be taken.
10. Site Investigation. Please include estimates of the volume (cubic yards or tons) of the soil and vegetation to be removed from all the areas.
11. Please include a reference section in this document. This work plan is a continuation of last year's work plan and that should be mentioned in the text with a reference to last year's work plan and sampling report. For example, the 2003 Sampling and Analysis Plan could be used for this project, if it is referenced and an explanation of any changes to it is documented in this work plan.

Draft Sampling and Analysis Plan North River RRS 2004

12. In your February 9, 2004 letter, you requested a waiver of the 18 AAC 75.355 third-party requirements to allow Air Force personnel to perform field sampling at the site. The letter states that those workers are listed as "qualified persons" by DEC. On that basis, John Halverson, DoD Section Program Manager, has authorized me to grant the third-party waiver that you requested. If site workers change, please submit their resumes to DEC so that we may evaluate their qualifications.

If you have questions regarding this letter or Contaminated Sites Program regulations, please contact me at (907) 451-2181 or by e-mail at patrice_buck@dec.state.ak.us.

Sincerely,

Patrice Buck
Environmental Specialist

cc: James Linne, 611th
Art Ivanoff, Native Village of Unalakleet
Jacques Gusmano, EPA
John Halverson, ADEC

James Linne
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6260 Arctic Warrior Drive
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Art Ivanoff
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Jacques Gusmano
USEPA Region 10 - Alaska Operations Office
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Anchorage, AK 99513-7588

Response to

Review Comments on:

3. Draft Work Plan-Time Critical Removal North River RRS (dated May 2004);
4. Draft Sampling and Analysis Plan North River RRS 2004

General

1. Please number the pages of these documents.

Done

2. Please include a schedule for the 2004 project.

Done

3. Please provide a waste management plan for handling, transporting, and disposing of investigation-derived waste.

Done

Draft Work Plan-Time Critical Removal North River RRS

4. Preface. Please provide more explanation of how this work plan ties into the work that was done last summer.

   Background section added to Introduction to do this.

   More detailed information is needed to describe this summer's work including:

   a. Description of how the geotech material and soil placed on the main road last summer will be removed.

   See new section, P.5 – Soil Removal – Area C

   b. Please mention that the fence will be removed. Will the fence be decontaminated and reused?

   The fence was placed outside the contaminated area. Text modified to mention removal of the fence.

   c. Description of how sampling will be done on the sides of the trail leading to the cabin.

   Now addressed in the sampling section under Current Project – Sampling - Area C

5. Preface. Add to the first paragraph that Area B soil will be sampled to confirm all contamination has been removed. Also, in this section it would be helpful to describe the kinds of contamination found (i.e., PCBs).

   Now covered under Current Project – Sampling – Area B

6. Introduction. Please identify what "GSA" stands for.

   Done

7. Site History. The last paragraph states "In 2002 and 2003, a USACE contractor removed approximately 3,300 drums…" The drum removal by the United States Corps of Engineers (USACE) was actually done in 2002 only. Soil, contaminated by leaking drums is scheduled to be removed by the USACE contractor in 2004. Please change the text to accurately reflect the cleanup schedule.

   Done

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   Background section added to Introduction to do this.

9. Current Projects. You stated that "Reasonable measures will be taken to minimize and suppress fugitive emissions of dust, vapors, decontamination of water, and other materials during excavation." Please describe what specific measures will be taken.
   Done

10. Site Investigation. Please include estimates of the volume (cubic yards or tons) of the soil and vegetation to be removed from all the areas.
    Included in the Current Project section.

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    Done

Draft Sampling and Analysis Plan North River RRS 2004

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    Noted, thank you.

From: Stephens, Tamar [mailto:Tamar_Stephens@dec.state.ak.us]
Sent: Thursday, May 06, 2004 3:13 PM
To: Wootten, Doug
Subject: North River Work Plan

Doug,
I have read through the Draft II Work Plan - Time Critical Removal, North River Former Radio Relay Site, and have three concerns that need to be addressed before I can approve the work plan.

1. The analytical laboratory needs to be identified before work starts. (See table on page 7 of work plan.) I can approve the work plan without this information, but you should be aware that DEC should be notified before the work starts.

2. Page 9 Investigation Derived Waste: This section says that decontamination water will be treated in a granulated activated carbon treatment system and discharged under the ADEC general permit. I do not think we have a general permit that covers PCBs. You don't actually need a permit, since an approved work plan will serve as the functional equivalent. In order for me to approve this discharge, I want the following:

a) the analytical methods you will use to analyze the water,
b) the detection limits of those methods (especially for PCBs);
c) provide a means of holding the water until analyticals confirm that it is clean;
d) water must be non-detect for PCBs;
e) tell me where you want to discharge the water.

3. Regarding use of PetroFLAG and Clor-n-Soil, provide information to show that the detection limits of the field sample materials will be adequate. It is especially important with the Clor-n-Soil that you do not overlook areas of PCB contamination because of non-detects on screening samples that could result from inappropriate detection limits, or from poor correlation with analytical results.

Please call me so we can discuss the most expedient way to resolve these concerns.

Thank you,
Tamar

Tamar Stephens
Department of Environmental Conservation
610 University Avenue
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STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

FRANK MURKOWSKI, GOVERNOR

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File: 630.38.001

May 11, 2004

Mr. Douglas Wootten
USAF 611th CES/CEVR
10471 20th Street, Suite 348
Elmendorf AFB, AK 99506-2270

Re: Review and approval of *Draft II Work Plan – Time Critical Removal, North River Former Radio Relay Site, Alaska*

Dear Mr. Wootten:

The Alaska Department of Environmental Conservation (DEC) has completed its review of the *Draft II Work Plan – Time Critical Removal, North River Former Radio Relay Site, Alaska*. DEC received this work plan on March 24, 2004. This work plan describes a time critical removal action to excavate an estimated 250 cubic yards of polychlorinated biphenyl (PCB)- and petroleum-contaminated soil and an unspecified volume of vegetation with potential PCB contamination from three areas associated with the North River Radio Relay Site near Unalakleet, Alaska, and to conduct additional sampling of soil and vegetation to further define the extent of contamination. Work is planned for the summer of 2004.

This work plan adequately meets the requirements of 18 AAC 75.360 and is therefore approved, on the condition that the final work plan will include the revised wording for the work plan section titled "Investigative Derived Waste" that Mr. James Linne of the Air Force submitted to DEC by e-mail on May 10, 2004. This section of the work plan will state that an estimated 1000 gallons of decontamination water will be generated during this project and will specify that all water will be held in 300-gallon tanks until analyses are received from the laboratory. Any water containing constituents greater than the practical quantitation limit (PQL)for PCBs, volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs) will be placed in drums and flown to Elmendorf Air Force Base for disposal. All water containing constituents less than the PQL will be discharged to the land surface in the vicinity of the decontamination area which is on high, flat ground more than 1000 feet from any water body. The PQLs are 1.0 µg/L for PCBs, 0.1 µg/L for VOCs, and 10 µg/L for SVOCs. Approval of this work plan is the functional equivalent of a wastewater disposal permit for the decontamination water.

If you have any questions about this letter, or wish to discuss any other matters related to this project, please call Tamar Stephens at (907) 451-2131.

Sincerely,

Tamar J. Stephens
Environmental Specialist

cc: James Linne, 611th
Art Ivanoff, Native Village of Unalakleet
Jacques Gusmano, EPA

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