



**June 20, 2003**

Mr. Thanh Minh Trinh, P.E.  
Regional Environmental Compliance Officer  
U.S. Department of Commerce  
National Oceanic & Atmospheric Administration  
Western Administrative Support Center  
Facilities & Logistics Division  
7600 Sand Point Way Northeast  
Seattle, WA 98115-0070

Re: Letter Report  
Battery Debris Removal  
Auke Bay Laboratory  
Juneau, Alaska

Dear Mr. Trinh:

The following CCI, Inc. (CCI) letter report documents the removal of surface debris located near the northeast property boundary corner of the National Oceanic & Atmospheric Administration's (NOAA) Auke Bay laboratory in Juneau, Alaska ([Figure 1](#)). The debris consisted predominantly of lead automobile batteries (whole and broken fragments), and miscellaneous metal (steel and aluminum), lumber, vehicle tires, and household solid waste ([Photographs 1 and 2](#)). The debris was concentrated in a mounded (main) debris field located adjacent to a surveyed and marked property boundary point between NOAA's laboratory property and the adjoining property to the north. Other surface debris was found scattered on a slope leading up to a garage located on the adjoining property to the north, and in and adjacent to a small intermittent stream drainage all within an approximately twenty-foot of the center of the mounded debris field ([Figure 2](#)).

#### Preliminary Activities

CCI's subcontractor, Bristol Environmental & Engineering Services Inc. (BEESC) completed a site visit on February 13, 2003. The objective of the visit was to confirm the volume of debris present and to generate an action plan to efficiently and safely remove the debris.

Prior to initiation of any removal-related activities, BEESC acting on behalf of NOAA, obtained written permission from the adjoining property (north) owner, Lee and Christy Hagmeier, to remove existing surface debris located in close proximity to the common boundary between the two properties near the aforementioned marked survey point. The permission letter, dated February 25, 2003, is included in [Attachment A](#).

Also prior to the initiation of any physical removal activities, CCI completed, submitted, and had approved by NOAA on May 12, 2003 a site-specific work plan, a health and safety plan, and a sampling and analysis plan for the debris removal project.



Tri-wall boxes to be utilized for the transport of lead batteries and broken battery fragments were purchased and shipped to the Auke Bay laboratory prior to mobilization of personnel to Juneau.

#### Field Activities

CCI mobilized personnel, consisting of one site supervisor/equipment operator, two laborers, and one staff professional/sampler, to Juneau on May 13, 2003. Project equipment, consisting of one tracked excavator and pick up truck, were mobilized to the work site on May 13, 2003.

In the morning of May 13, 2003, CCI's site supervisor conducted a site orientation/health and safety meeting, and CCI's personnel demarcated an exclusion zone around the work area with warning tape to limit public access to the work area. CCI personnel also mounted the tri-wall boxes on wooden pallets in preparation for containerizing the lead-containing material for transport to a recycling facility.

CCI initiated debris removal operations in the late afternoon of May 13, 2003 and completed field removal operations on May 15, 2003. Removal operations consisted of exposing the debris with the excavator ([Photograph 3](#)), and hand sorting and segregating the various types of debris ([Photograph 4](#)). Lead batteries and battery fragments were placed into the excavator's bucket and loaded directly into tri-wall containers temporarily staged in the adjoining property's garage driveway located adjacent to the Glacier Highway ([Photograph 5](#)). Full tri-wall boxes were transported to a temporary holding area in the laboratory parking lot located approximately 200 feet south of the work site and covered with tarps ([Photographs 6](#)). The remaining types of debris were loaded into a pick up truck that was staged in the aforementioned garage driveway and covered with a tarp for transport to the disposal facility. The pick up loads (5) of the collected debris (approximately 4,000 pounds) were transported to the Capitol Disposal's (Capitol) incinerator/landfill facility in Juneau between May 13 and May 15, 2003 where they were off loaded in areas designated by Capitol either for metal, wood, or material to be incinerated. The disposal receipts are included in [Attachment B](#).

After completion of removal operations on May 15, 2003 ([Photographs 7 and 8](#)), Mr. Tom Dress, NOAA's on site project coordinator, inspected the completed site work. Mr. Dress issued no oral or written deficiency corrections or any other additional clean up directives to CCI.

After Mr. Dress's inspection, a BEESC State of Alaska Qualified Person established a grid over the work area and collected ten soil samples at grid spacing ranging from approximately 9 to 11 feet (Figure 1). The samples were collected using clean sampling equipment, placed in new laboratory supplied glass jars, labeled, and cold packed in a portable container. The container was transported under chain-of-custody manifest to CCI Analytical Laboratories, Inc., an Alaska Department of Environmental Conservation recognized laboratory in Everett, Washington on May 19, 2003. Once sample collection was completed, a Jute fabric matting was laid over the disturbed debris removal work area to prevent soil erosion ([Photographs 9 and 10](#)).

Approximately 6 cubic yards of lead battery debris were collected and placed in tri wall boxes. The tri wall boxes were picked up by a Clean Harbors Environmental Services Inc. (Clean Harbors) contracted hauler, Alaska Marine Lines, on May 16, 2003 and transported to Clean



Harbors' Juneau hazardous waste collection facility for subsequent marine and overland transport to a designated lead recycling facility. The Clean Harbors transport manifest is included in [Attachment C](#).

The lead results of the soil samples in milligrams per kilogram are summarized in the following table. Lead soil cleanup levels are based site-specifically on land use determinations. For residential land use, the soil cleanup level is set at 400mg/kg. For commercial or industrial land use, the cleanup level is set at 1,000 mg/kg. An alternative cleanup level may be proposed through an approved risk assessment.

Sample	1	2	3	4	5	6	7	8	9	10*
Analyses	8300	58000	1400	11000	190	750	260	170	260	620
*Duplicate sample of sample # 9      Analyses are in mg/kg										

The laboratory report is included in [Attachment D](#).

All project equipment and personnel were demobilized from the site on May 16, 2003.

Final disposal of lead material by Clean Harbors occurred on 07 July 2003. The disposal certificate is included as [Attachment E](#).

Sincerely,

*Samuel Pelant*

Samuel Pelant  
Construction Manager,  
CCI, Inc.

CC: Hank Seipt – BEESC  
Mike Kaminski - CCI

Enclosures:

Figure 1 – Auk Bay Laboratory site  
Figure 2 – Debris Field Location  
Attachment A – Site Permission Letter  
Attachment B – Solid Waste Disposal Receipts  
Attachment C – Hazardous Waste Transport Manifest  
Attachment D – Lead Sampling Laboratory Report  
Attachment E – Certificate of Disposal