

**Response to
Alaska Department of Environmental Conservation
Comments on the *Draft RDM EECA Dec. 2013***

Comment 1: "Consistent with EPA Risk Assessment Guidelines for Superfund, Part A (1989), data from unfiltered water samples were used to estimate exposure in the HHRA."

The guidance is also consistent with ADEC regulation 18 AAC 75.380 (c) 2, which states "groundwater cleanup levels, based on an analysis of unfiltered groundwater samples unless a responsible person demonstrates that a filtered sample provides a more representative measure of groundwater quality. Please include ADEC reference

Response 1: Based on US EPA comments, chemical specific ARARs are not applicable with the EE/CA removal action alternatives. Therefore, they have been removed from the document.

Comment 2: Final cleanup levels should not be presented in the report as the objective of the EECA is to minimize migration of contaminated sediment. The current objective is not to remove sediment from Red Devil Creek to a RBCL. Section 3 should also be updated accordingly.

Response 2: Appropriate changes to the text were made.

Comment 3: The table is incorrect as surface water screening results are being presented but soil human health screening levels is in the title of the column used for screening. Screening should be based off surface water and not soil values.

Response 3: The majority of the risk assessment findings were removed from the document, and the removal alternatives are not being compared to chemical-specific ARARs.

Comment 4: Table 2-5 should be removed as the goal of the early action is to limit migration of sediment contaminants from Red Devil Creek to Kuskokwim River and not based on removing contaminated sediment to a RBCL. RBCL for the sediment in the creek is currently not the specific objective of the EECA.

Response 4: Table 2-5 has been deleted.