

STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

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September 8, 2008

File no.: 2510.38.002

Mr. Larry Beck
United States Bureau of Land Management
Anchorage Field Office
4700 BLM Road
Anchorage, AK 99507

Re: Approval of *Red Top Mill Assessment*
BLM Red Top Mercury Retort, rekey: 1992250928601

RECEIVED

SEP 10 2008

Anchorage Field Office

Dear Mr. Beck:

The Alaska Department of Environmental Conservation (department) has completed review of the *Red Top Mill Assessment*, BLM Red Top Mercury Retort, prepared by Shannon & Wilson, Inc, and dated April 2008. This report meets the requirements of 18 Alaska Administrative Code (AAC) 75.335(d) and is approved.

This assessment was conducted in response to a letter from the department dated September 21, 2005 which outlined several issues which needed to be resolved prior to the department concurring that no additional remedial actions are needed at this site. The assessment addressed three (3) of the six (6) issues in the 2005 letter, specifically: # 2 – evaluate and provide information on the potential for erosion of the site due to river currents and flooding; #3 – provide information regarding potential groundwater contamination; and #4 – provide information regarding waste rock or tailings on-site.

Potential for Erosion

An evaluation of aerial photographs over the past 30 years showed little change in the configuration of the river bank at the site. The site was inspected and the river bank showed little indication of high water erosion. Flooding of the site occurs occasionally, however photographs of the site show substantial vegetation which would prevent considerable surface erosion.

The department is satisfied that the soil with contamination remaining in place is likely not to be subject to significant erosion.

Groundwater Sampling

Three (3) temporary well points were installed downgradient of the remaining contamination under the liner and upgradient of the Wood River to determine if contamination was migrating in the groundwater to the river. Analytical sample results were non-detect for all samples demonstrating that mercury is not migrating in the groundwater to the river.

The department is satisfied with this evaluation of the groundwater to surface water exposure pathway.

Waste Rock and Tailings

A visual survey was conducted for piles of waste rock and tailings at the site and from the river looking back at the site. In addition, 18 shallow test pits were dug at the site and above on Marsh Mountain to try and locate waste rock or tailings. Neither waste rock nor tailings were found to be present.

The department is satisfied with the field investigation for the presence of waste rock and tailings.

There are three items remaining from the 2005 letter which need to be resolved prior to closure, specifically: #1 – institutional controls; #5 – clarification on land ownership; and #6 – public notice. The department is certain that these issues can be resolved fairly easily and the site can be closed in the near term. Please be aware that consistent with CERCLA, BLM will be responsible for conducting Five Year Reviews at the site as contamination will still be present.

If you have any questions about this site, please do not hesitate to contact me at 766-3184.

Sincerely,



Anne Marie Palmieri
Environmental Program Specialist