

# STATE OF ALASKA

## DEPT. OF ENVIRONMENTAL CONSERVATION

WALTER J. HICKEL, GOVERNOR

*RJV* 12/24/92  
CP 12/28/92

WESTERN DISTRICT OFFICE  
800 E. DIMOND, SUITE 3-470  
ANCHORAGE, ALASKA 99515

'92 DEC 23 P1:53

CAMPBELL TRACT FACILITY

349-7755

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

December 21, 1992

Richard Vernamin, District Manager  
Bureau of Land Management  
6881 Abbott Loop Road  
Anchorage, AK 99507

SUBJECT: Notice of Violation/Request for Corrective Action (NOV/RCA),  
Contaminated Site No. 92-259-286-01 (Wood River mercury retort site)

Dear Mr. Vernimen:

Property owned by the U.S. Bureau of Land Management (BLM) adjacent to the Wood River near Aleknagik, Alaska, on the parcel identified as SS A054326, has been found to be contaminated by mercury. The contamination is reportedly the result of a WWII mercury-ore processing operation and subsequent deterioration of structures at the site which appear to have contained elemental mercury. Soil sampling by residents of the Aleknagik area, under the direction of Greenpeace, and by the Department's Western District Office personnel showed high levels of mercury in soils in the vicinity of the mercury retort. In addition, in localized areas, soils at the site are reportedly contaminated with petroleum hydrocarbons from some of the approximately 15 drums in the immediate vicinity of the retort. The drums reportedly contain an estimated 1150 gallons of bunker C oil and possibly diesel.

The contamination constitutes violations of AS 46.03.710. (Pollution of the Air, Land, Subsurface Land or Water of the State Prohibited), and AS 46.03.740 (Discharge of Petroleum or Petroleum Products without a Permit Prohibited) and associated regulations.

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The Department requests that you submit a Contamination Assessment and Phase I Remedial Action Plan as one document to the Western District Office for approval **by February 28, 1993**. The Phase I Remedial Action Plan must include the commencement of cleanup of soils highly contaminated by mercury, and the containment of any drums showing evidence of leakage, **by July 1993**, to be **essentially completed by August 31, 1993**.

Site work should begin as soon after spring break-up as possible. The Department will provide to BLM a preliminary mercury cleanup level by January 31, 1993, based on the available sample analysis data and environmental considerations such as background mercury levels in the Wood River area. The cleanup level is subject to change as additional data becomes available. Extensive background sampling should be included as part of the contamination assessment work.

In addition, please include as part of the contamination assessment portion of the plan, a plan to **characterize the Red Top mine site**, identified as parcel SS A054326, **during the summer of 1993**.

The Contamination Assessment and Phase I Remedial Action Plan should include the following:

1. comprehensive site characterization plan including soil and groundwater sampling plan and QA/QC plan for sampling of soils
2. laboratory analytical methods with QA/QC plan
3. plans to contain drums showing evidence of leakage
4. contaminated soil treatment and/or disposal plans for both mercury and petroleum contaminated soils

All site activities must be performed in accordance with the following Department guidance (enclosed): **"Interim Guidance for Non-UST Contaminated Soil Cleanup Levels, Guidance No. 001 - Rev. No. 1,"** of July 17, 1991, and **"Guidance for Storage, Remediation, and Disposal of Non-UST Petroleum Contaminated Soils"** of July 29, 1991. (Note that the latter guidance includes "Interim Guidance for Surface and Groundwater Cleanup Levels," dated September 26, 1990). The plan must be approved by the Department prior to any sampling, clean-up or disposal activities.

If the Department determines that containment or cleanup activities are not adequate, it may direct the person engaged in the activities to cease and may undertake the

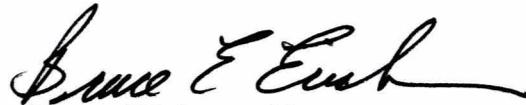
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activities itself through a contractor or its own resources or both. If the Department undertakes clean-up action, it must by law seek reimbursement through civil action for the expense it incurs in cleaning up or containing contamination.

The Department specifically reserves the right to require additional assessment or cleanup activities as information is developed during the course of the site evaluation and cleanup. The Department specifically reserves the right to take further action as provided for in Title 46 of the Alaska Statutes. Additionally, the Department reserves all its rights to pursue any and all other responsible parties involved in this incident.

Western District Office personnel will provide BLM with a complete copy of the Wood River mercury retort site file by December 31, 1992. If you have any questions or require additional information please call Eileen Olson at the Western District Office (349-7755).

Sincerely,



Bruce Erickson, Manager  
Western District Office

enclosures: **"Interim Guidance for Non-UST Contaminated Soil Cleanup Levels, Guidance No. 001 - Rev. No. 1,"** of July 17, 1991, and **"Guidance for Storage, Remediation, and Disposal of Non-UST Petroleum Contaminated Soils"** of July 29, 1991.

cc w/out enclosures:

Max Schwenne, ADEC/SCRO  
Bruce Erickson, ADEC/WDO  
Dennis Lundine, ADEC/WDO