

STATE OF ALASKA

WALTER J. HICKEL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

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

349-7755

RECEIVED

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May 5, 1993

CAMPBELL TRACT FACILITY

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

SUBJECT: Review of site characterization sampling and analysis plan for the Red Top Mercury Retort site near Aleknagik, Alaska (ADEC C.S. 92-259-286-1; NRC No. 151600)

Dear Mr. Vernimen:

The department has reviewed the Bureau of Land Management (BLM) plan, "Red Top Mercury Retort, Sampling and Analysis Plan, Near Dillingham, Alaska" received April 1, 1993 by the Western District Office (WDO). The department finds that the plan has adequately addressed the requirements of the department's December 21, 1993 Notice of Violation (NOV) letter to BLM. As discussed during April 30th and May 4th telephone conversations between Eileen Olson/WDO and Mac Wheeler/BLM, the plan is approved contingent upon the department receiving the information requested below, and on the following changes and clarifications being made:

It was agreed that the plan submitted is essentially the contamination assessment portion of the requested contamination assessment and phase I remedial action plan, and should be retitled and referred to after this as the Red Top Mercury Retort Site Characterization Plan. The remedial action plan will still be submitted during summer of 1993 but not until after completion of the site characterization work. The department's NOV also included a request for a plan to characterize the Red Top mine site, identified as parcel SS A054326, during the summer of 1993. Please indicate when that plan will be submitted.

Since the task orders for the Red Top work are essentially part of the site characterization plan, please provide the department with a copy of the task orders as soon as they are finalized.

The department recommends that the proposed test holes be dug and sampled to a depth of three feet rather than variously to depths of two and three feet, with the exception of the holes along the river shore adjacent to the bank. The proposed

depths selected for the latter holes are appropriate for that location. Also, the department does not require river water samples at this time, and recommends that instead, the upper six inches of river sediment be sampled at the proposed locations for river-water sampling.

If the drums of petroleum products are moved as indicated on page 10 of the plan, the department recommends that they be placed on petroleum-resistant liner rather than on absorbant pads. Field screening by photoionization meter or other method (such as the ELISA method indicated in the plan) is acceptable as long as BLM's consultant provides information to the department on the technique to be used prior to beginning work, and if the method detection limit is below the site-specific cleanup level for petroleum hydrocarbons.

Unless BLM or its contractor can demonstrate to the department's satisfaction that the bunker C fuel can be burned without producing black smoke, the bunker C cannot be burned on-site either as a heat source or as a means of disposal. Please contact Bill MacClarence of the department's Air Quality Section at 563-6529 for further information.

Mr. Wheeler indicated that the statement, on page 13 of the plan, that "the first step will be the careful dismantling and retrieval by a suction pump of all free mercury that is located in the retort furnace" should also include the removal of free mercury in soils that can be practically removed by application of a suction pump.

If you have any questions or require additional information please call me at the Western District Office (349-7755), or Max Schwenne, Contaminated Sites Program Manager, at the South Central Regional Office (563-6529).

Sincerely,



Eileen Olson
WDO Hydrologist

cc: Max Schwenne/SCRO
Bruce Erickson/WDO
Scott Rose/SCRO