

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

Spill Prevention and Response
Contaminated Sites Remediation Program
Site Remediation - Anchorage
555 Cordova Street
Anchorage, AK 99501

September 4, 1998

Mike Alcorn
U.S. Department of the Interior
Bureau of Land Management
6881 Abbott Loop Road
Anchorage, AK 99507

Subject: Review of "Draft Limited Waste Removal Work Plan, Red Devil Mine, Red Devil, Alaska" dated July 23, 1998 and prepared by HLA/Wilder JV

Dear Mr. Alcorn,

The Department has reviewed the Bureau of Land Management's (BLM) draft work plan for limited waste removal at the Red Devil Mine site, received by this office on August 3, 1998. The Department requests that you provide a revised plan or plan addendum based on the following comments:

- 1) The locations of all batteries, chemicals, mercury contaminated soils, and other hazardous substances or media containing hazardous substances which are removed from the site must be thoroughly documented both photographically and at a minimum by basic survey methods (swing-tie measurements) before removal. In particular, free mercury visible on the surface soil in the retort area must be photographically documented before removal.
- 2) The Department requires that soil samples from soils beneath the batteries be collected and analyzed for lead content at the time of removal.
- 3) BLM proposes to excavate a predetermined quantity of soils in the retort area which are contaminated with free mercury. The Department requires that a minimum of one sample be collected from the base of the excavation following soil removal and analyzed for total mercury. The sample should be selected based on maximum visible mercury present, and if no mercury is visible, should be collected directly beneath the most highly contaminated surface soils.

TONY KNOWLES, GOVERNOR

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Mike Alcorn, BLM
September 4, 1998
Page 2 of 2

- 4) The Department requests that soils beneath the transformers, drums and buckets be field screened and sampled at the time the transformers and switchgears are drained, and at the time drums and buckets are removed. However, sampling of these areas may be postponed if the sampling will be done before October 1999.

Please keep the Department notified of the field schedule. Also, note that a Department representative may elect to be on site to observe field activities during the planned site characterization and/or removal work. Please call me at (907) 269-7658 to you have questions or comments.

Sincerely,



Eileen A. Olson
Environmental Specialist

cc: Matt Carr, EPA R10/Anchorage
Jim Frechione, ADEC Anchorage
Kent Patrick-Riley, ADEC Watershed
Deborah Vo, Executive Director, Alaska Inter-Tribal Council