

Alaska Inter-Tribal Council

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September 14, 1998

Rick Albright, Director
Alaska Operations Office
US EPA, AOO
222 W. 7th Avenue, Suite #19
Anchorage, Alaska 99513

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ANCHORAGE - 500/A

Subject: Red Devil Mine

Dear Mr. Albright:

AI-TC requests that the Red Devil Mine scope of work be re-examined to insure that the health and welfare of the 23 tribal communities on the Lower Kuskokwim River is not jeopardized. These communities have been continuously exposed to possible contaminants since 1933 continuing through mine closure in 1971, and then by site exposure to asbestos, POL, lead batteries, PCBs, antimony and arsenic.

It has been noted that the scope of work does not include soil testing and/or removal of contaminated soils (tailings since 1933). Contaminated soils have been exposed to rain leaching to the Lower Kuskokwim via Red Devil Creek, which runs through the center of the Red Devil Mine site. The 23 tribes on the Lower Kuskokwim are directly effected by this contamination - the 7 tribes on the north and south forks are indirectly contaminated by fish migrating up river that may have been exposed by ingestion of mercury and other contaminants, entering the food chain.

The scope of work, as prepared by BLM Site Contractor, has been reviewed by AI-TC and only reinforces short comings. Previous inspections include:

- 1988 Site Report (SI, Site Investigation) by Ray F. Weston
- US EPA (1971)
- US EPA (1979)
- DEC (1985)
- DEC (1987)
- Site has an EPA Hazard ranking score of 14.95 (BLM HAZ Waste site Class III Weston, 1989)
- No soil sample test for Petroleum, Oil, Lubricants (POL) contamination.
- No soil sample for lead contaminants.
- No soil for AACM asbestos.
- Per mercury (estimated) visible as surface soil equalling to one-55 gallon drum was collected.
- No soil sample will be taken for mercury and only 1 barrel of soil will be removed.

- Note ALL (18) transformers vs. two that contain PCB @ < 50 parts per million
- Page 1 of the Wilder report shows two transformers had PCB concentrations over 50 parts per million, which were removed.

Site Investigation Report Quotes by HLA/Wilder reveals the following quotes and the anticipation of completion:

- Tailing and sediment show mercury, antimony, arsenic (soil testing not included in work plan).
- Two of the 31 transformers had PCB concentration over 50 parts per million (remove from site).

Remove and dispose of :

- Chemical stored at site copper sulfate: sodium hydroxide, potassium carbonate.
- Five 100 lb. pound bags of copper sulfate
- Fifteen 50 pound bags of sodium hydroxide
- One Hundred Seventy-five 100 pound bags of potassium carbonate
- Oil from 21 transformers and 2 switch gears
- Thirty-three 55 gallon drums of unknown material
- One 55 gallon drum aero xanthate
- Eight 5 gallon buckets grease substance
- One 55 gallon drum visible free mercury *note: BLM quoted as entire site contains only 1 tsp. of mercury
- One Hundred Lead Acid batteries
- Yellow unidentified loose chemical present at site *note: scope of work shows no soil will be evacuated from site and no analytical samples will be taken after chemical removal.
- Composite sample will be analyzed at (CT&E) 2 switch gear will be drained of oil w/ sample taken.
- Transformers will be left on site. No samples from site will be taken.
- Three drum storage areas - no soil samples will be taken from site.
- Four 100+ lead acid batteries will be packaged whole in environmental packaged boxes. No soil samples will be taken from site.
- 22.5 asbestos (SCM) will not exceed two 55 gallon drums unless authorized by BLM Project Inspector. Friable loose asbestos will be gathered (complete ACM abatement is not in scope of work).
- 22.6 visible -free mercury on surface area in report area. A maximum quantity equivalent to one 55 gallon drum of mercury contaminated soil will be removed for disposal. Determination of level and quantity and taking of soil samples not included in the scope of work.

AI-TC review of the scope of work reveals that BLM (Land Owner) is not addressing this mine from a view point that the Red Devil Creek and entire Kuskokwim River drainage may have been contaminated. It is apparent from the scope of work agreement

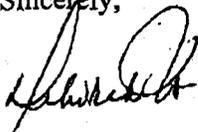
that only superficial remedial action is being proposed at this site, as no soil sampling or removal of contaminated soils is being addressed.

It is the contention of AI-TC that since 1933, contaminants have been generated at the Red Devil mine and the 23 communities on the Lower Kuskokwim were continually subject to contamination. The scope of work plan of BLM appears to superficially address normal site clean up priorities. It does not address soil contamination and does not address possible contamination of the watershed.

It is recommended by AI-TC that the scope of work be revisited, re-evaluated, and re-addressed to include subsurface waters contamination originating at Red Devil Creek that effect all 23 communities of the Kuskokwim River, to include the north, south forks and Stony River tributaries. These water ways have been exposed to the mentioned contaminants since 1933. It is also felt that fish migrating to the upper reaches of the Kuskokwim are contaminated (see site map attached wet lands and water sheds down river are also effected). On behalf of the 30 tribes that are conceivably effected by this scope of work is requested by AI-TC that this site revert to oversight by USEPA. AI-TC is concerned that continuing remedial work to remove known contamination until "next year" and then only addressing contractors "scope of work" is counter-productive.

It is our belief that US EPA is best suited to exercise trust responsibility on behalf of Alaska tribes that are effected by the Red Devil mine. The scope of work should include degree of contamination at Kuskokwim River community sites.

Sincerely,



Deborah Vo
Executive Director

cc: Senator Ted Stevens
Rick Albright, US EPA AOO
US BLM