

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES REMEDIATION PROGRAM

TONY KNOWLES, GOVERNOR

555 Cordova Street
Anchorage, AK 99501-2617
Phone: (907) 269-7527
Fax: (907) 269-7649
<http://www.state.ak.us/dec/>

April 15, 1999

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

RECEIVED
APR 22 1999

BUREAU OF LAND MANAGEMENT

Subject: Review of "Limited Waste Removal Work Plan, Red Devil Mine, Red Devil, Alaska" dated March 12, 1999 and prepared by HLA/Wilder JV

Dear Mr. Alcorn,

The Department has reviewed the subject "Limited Waste Removal Work Plan" for the Red Devil Mine, with cover letter dated March 15, 1999, received on March 17th. Also submitted with the work plan were a Public Notice, the index to the Red Devil Mine Administrative Record, last updated on March 10, 1999, and the Red Devil Mine Community Relations Plan, dated March 8, 1999. This letter addresses only the work plan. Review of the other documents is still in progress.

The Department approves the work plan with the following comments and conditions:

- 1) Applicable regulations and guidance: Note that the Department's contaminated sites regulations have been finalized, and that the applicable regulatory standards and guidance for addressing soil and groundwater contamination at the subject site are Article 3 of 18 AAC 75, referred to as the contaminated sites regulations and titled "Oil and Hazardous Substances Pollution Control Regulations", dated January 22, 1999; and the UST Procedures Manual dated December 10, 1998. The UST Procedures Manual is adopted by reference in the contaminated sites regulations and provides guidance for remediation of petroleum-contaminated soil and water, and standard sampling procedures. The Procedures Manual supercedes the ADEC Interim Guidance for Storage, Remediation and Disposal of Non-UST Petroleum Contaminated Soils" dated July 29, 1991. The Department no longer approves Quality Assurance Project Plans (QAPPs), and information and procedures found in a QAPP do not take precedence over current regulations and guidance.

Mike Alcorn/BLM

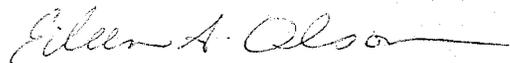
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- 2) Section 2.2.1 Chemicals: Following cleanup of chemical compounds, the plan proposes to collect one soil sample from the center of the storage area to assess the area for possible contamination from the stored compounds, which include copper sulphate, sodium hydroxide, potassium carbonate, and a yellow liquid compound which has not yet been identified. Sampling should be based on field observations, such that if these compounds are observable in soils, the area(s) where the compound(s) are observed are sampled rather than the center of the storage area. A single sample taken from the center of the storage area is acceptable if there is no visible or other field observable indication that residual compounds are present in soils. The Department understands that BLM is looking into on-site neutralization of the sodium hydroxide.
- 3) Section 2.2.2 Transformers and Switchgears: Stained soils in the vicinity of the switchgears and transformers, if present, should be sampled for PCBs, or at a minimum, the locations of stained areas should be documented for future investigation.
- 4) Section 2.2.6 Visible Mercury: Observations such as any visible mercury in soils which are excavated, and soils remaining in the excavation should be recorded. The excavation, including the sample locations, should be documented photographically.

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) 269-7527 if 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