

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM

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January 2, 2002

Mr. John Lindsay
Pribilof Project Manager
U.S. Department of Commerce, NOAA
National Ocean Service
Office of Response and Restoration
7600 Sand Point Way NE BIN C15700
Seattle, WA 98115-0070

RE: Draft Site Closure Report Salt Lagoon Drum Removal NON-TPA Site St. Paul Island
November 2001

Dear Mr. Lindsay:

The Alaska Department of Environmental Conservation (ADEC) has received the above document on December 6, 2001. Below are ADEC's comments.

3.4 Previous Investigations and Other Activities Page 5

The text states NOAA's contractor does not know of any other previous environmental reports involving the Salt Lagoon Drum Removal Site. The ADEC wishes to inform the contractor that there are numerous previous investigations, studies, and documents produced by various agencies involving the Salt Lagoon. Here is a listing (not meant to be all inclusive) of documents that the ADEC is aware of:

- Corps Of Engineers Environmental Assessment St. Paul Harbor February 1988
- Corps Of Engineers Site Investigation Salt Lagoon Diesel Seep November 1989
- Corps Of Engineers State of Work Site Investigation Salt Lagoon Diesel Seep August 14, 1989
- NMFS St. Paul Island Salt Lagoon Diesel Seep Memorandum July 7, 1989 and companion document Engineer Site Visit June 20-22 1989-Report On National Marine Fisheries Service St. Paul Island Salt Lagoon Diesel Seep
- Corps of Engineers Final Site Investigation for Salt Lagoon Diesel Seep February 28, 1990
- NOAA Proposed Remediation for Salt Lagoon Diesel Seep June 25, 1991
- Work Plan for Remediation of Contaminated Ground Near Salt Lagoon January 13, 1992

- NOAA Oil Spill Consultants Final Report Diesel Fuel Spill Remediation June 29, 1992

- NOAA E & E Inc./Corps of Engineers Preliminary Assessment of NOAA Sites Pribilof Islands February 1993
- Corps of Engineers Environmental Assessment/Finding of No Significant Impact April 1998 for dredging project involving portions of the Salt Lagoon
- Corps of Engineers Woodward Clyde Consultants Draft Corrective Action Plan for Salt Lagoon Diesel Seep Site June 1994
- NOAA Oil Spill Consultants Work Plan for Hazardous and Toxic Waste Removal and Disposal August 15, 1994
- Corps of Engineers Site Inspection Report St. Paul Island September 1994
- USDOJ BLM St. Paul Island Land Conveyance letter dated August 16, 1994-which shows Diesel Seep Salt Lagoon land and "Seal By-Products Processing Plant" in Lot 1, T. 35 S., R. 132 W. Seward Meridian occurred on January 19, 1979 and Patents in 1990
- Corps of Engineers Woodward Clyde Consultants Technical Scope of Work Contaminated Soil Excavation and Stockpiling Salt Lagoon Diesel Seep August 1994
- NOAA Oil Spill Consultants Work Plan for Petroleum Contaminated Soil Excavation and Stockpiling St. Paul Island October 1, 1994
- USEPA Fed. Facilities Site Assessment manager letter to NOAA regarding the Site Inspection conducted for NMFS property on St. Paul Island stating No Further Action is required under the CERCLA Program
- NOAA Oil Spill Consultants Final Report for Contaminated Soil Excavation and Stockpiling April 6, 1995
- NOAA Draft Site Characterization Plan Diesel Seep Site July 2000

There may be more documents and reports concerning the Diesel Seep Salt Lagoon area on St. Paul Island that ADEC is not aware of which NOAA has in its possession in either draft or final form. Based on a review of the data presented in the report, the ADEC concurs that the drum removal action was successful and no additional remedial action is required for the drum removal at the NON-TPA site *Salt Lagoon Drum Removal Site*. This determination is only for the *Salt Lagoon Drum Removal Site* and it does not apply to any other site mentioned in the document (especially TPA Site No. 13-1 Salt Lagoon Diesel Seep).

However, if in the future, additional contamination or unacceptable risks to human health or the environment are discovered at this site, further investigation and/or remedial actions will be requested of NOAA by the ADEC. The ADEC reserves its rights, under 18 AAC 75 Oil and Other Hazardous Substances Pollution Control regulations and AS 46.03 to require NOAA to conduct additional assessment and/or corrective actions, if information indicates the site conditions pose an unacceptable risk to human health, safety, or welfare, or to the environment.

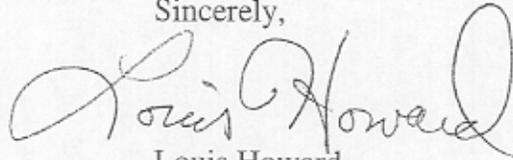
Mr. John Lindsay

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January 2, 2002

If you have any questions regarding this letter, please don't hesitate to call me at (907) 269-7552.

Sincerely,

A handwritten signature in black ink that reads "Louis Howard". The signature is fluid and cursive, with the first name "Louis" and last name "Howard" clearly distinguishable.

Louis Howard
Project Manager

cc: Jennifer Roberts, DEC Anchorage
Pribilof Islands RAB Members

lhoward\2002-NON TPA Salt lagoon drums.doc

NOAA Non-TPA Salt Lagoon Drums genl corr.