



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Response and Restoration
Pribilof Project Office
7600 Sand Point Way N.E.
Seattle, Washington 98115

June 4, 2008

Jennifer Roberts
Federal Facilities Program Manager
Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
555 Cordova Street
Anchorage, AK 99501-2617

Subject: Closure of the St. Paul Island, Alaska Operable Unit.

Dear Ms. Roberts:

In accordance with paragraph 59 of the Pribilof Islands Environmental Restoration Agreement (Two-Party Agreement or TPA) January 1996 by designated officials of the State of Alaska and the National Oceanic and Atmospheric Administration (NOAA), NOAA requests Alaska Department of Environmental Conservation (ADEC), as the duly authorized representative of the State of Alaska, certification of NOAA's completion of corrective action for the St. Paul Island Operable Unit (OU).

NOAA and the ADEC identified a total of sixty (60) sites at St. Paul Island (Table 1). This number (60) exceeded the number (15) of source areas identified in the TPA (Attachment A, St. Paul Island) due to agreed upon changes in the manner of site designation and the discovery of new sites during various phases of site investigation. Site 1 listed in TPA Attachment A and Table 1, and Sites 48 and 56 (Table 1), Windmill Wells and ATCO/Radio Building Barrel Storage Area, respectively, were subsequently recognized as formerly used defense sites (FUDS) in accordance with Public Law 106-562 legislated in 2000. While NOAA had conducted soil and groundwater assessments at these sites, PL106-562 precluded NOAA from undertaking any corrective action. Also, Site 57, Tract 46 Sheet Metal Garage (Table 1), did not include any hazardous materials, and general building demolition does not fall under the purview of ADEC regulations applicable to NOAA environmental restoration activities on the Pribilof Islands (TPA paragraph 2). Consequently, NOAA did not request a conditional closure or a no further action determination from ADEC for Sites 1, 48, 56, or 57. Appendix I contains copies of closure documents appropriate to each site in accordance with TPA paragraphs 42-47. Appendix II includes copies of NOAA's long-term groundwater monitoring plan approved by ADEC in 2005. NOAA considers groundwater and surface water corrective actions complete per TPA paragraph 59 with ADEC's approval of the plan and NOAA's on-going compliance with the plan.



NOAA asserts that it has completed in accordance with the TPA all investigations and corrective actions approved by ADEC, to the extent practicable by:

- removing drums and debris,
- removing underground storage tanks (USTs) and above ground storage tanks (ASTs),
- removing fuel pipelines,
- removing contaminated soil,
- closing solid waste sites, and
- characterizing and monitoring groundwater
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Table 1 summarizes specific environmental quality parameters at each site. Parameters in Table 1 include type of contamination (drums, surface debris and solid wastes), media contaminated (soil, surface water, and groundwater), presence or absence of residual contamination with succinct comments regarding land use (a.k.a. institutional) controls, as appropriate, the date ADEC signed its conditional closure or a no further remedial action planned (NFRAP) determination, as appropriate, per TPA paragraph 59, and the current property owner.

Appendix I also includes copies of deed notices recorded with the Alaska Recorder's Office, Aleutian District for ten sites where contamination and or buried debris remains in-situ. In addition, notice of residual contamination or buried solid waste will be identified in quitclaim deeds NOAA is drafting as it continues to transfer real property to St. Paul Island entities in accordance with the Transfer of Property Agreement signed by NOAA and various Pribilof Islands' entities in 1984.

Appendix II includes copies of the following and related documents: a St. Paul Village groundwater use and classification study; the long-term groundwater monitoring plan; ADEC's acceptance of the groundwater use and classification study and NOAA's request to apply the ten times rule; the ADNRC critical water management area determination; and a summary of in-situ residual soil and groundwater contamination.

In addition to the attached documentation and pursuant to TPA paragraph 57, NOAA maintains an administrative record (AR) for the St. Paul Island OU at the following four locations: St. Paul Island Tribal Government Center; Alaska Resources Library and Information Services, Anchorage, AK; NOAA Sand Point, Seattle, WA; and the National Archives and Records Administration, Seattle, WA. Currently, the AR is complete through calendar 2007. Calendar year 2008 documents will be added to the AR by the end of January 2009.

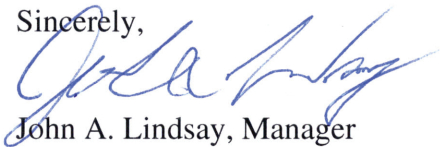


Per this submission, including Appendices I and II, NOAA requests ADEC concurrence that all corrective actions pursuant to the TPA between ADEC and NOAA signed in 1996 for the St. Paul Island Operable Unit are complete. Enclosed are two copies of a signature page attesting no further remedial action is planned ("conditional closure status") for the St. Paul Island Operable Unit. I have signed both copies as NOAA's project manager pursuant to TPA paragraph 42.

If you concur, please sign both copies on behalf of ADEC, returning one signed copy to me and retaining the other copy for ADEC's records.

If you have any questions, please do not hesitate to contact me either in writing, or at (206) 526-4560.

Sincerely,



John A. Lindsay, Manager
Pribilof Islands Environmental Restoration Project Office

Appendices: I and II

cc: St. Paul RAB Members (DVD only)
David Kennedy, Pribilof Program Director
William Broglie, NOAA OCAO
James Barrows, NOAA CAO
Nancy Briscoe, NOAA GCNR
Craig O'Connor, NOAA GCNR
Robert Taylor, NOAA GC





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For the National Oceanic and Atmospheric Administration



John A. Lindsay
NOAA, Manager, Pribilof Islands Environmental Restoration Project Office




Date

Approvals:

In accordance with Paragraph 59 of the Two Party Agreement (TPA), my signature confirms that all corrective action has been completed to the maximum extent practicable for all environmental media at NOAA's TPA and Non-TPA sites comprising the St. Paul Island Operable Unit, in accordance with the Agreement and that no further remedial action is required as a part of this conditional closure granted by ADEC.

For the Alaska Department of Environmental Conservation



Jennifer Roberts
Alaska Department of Environmental Conservation
Federal Facilities Program Manager



Date

