



U.S. DEPARTMENT OF COMMERCE
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National Ocean Service
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Pribilof Project Office
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February 7, 2005

Mr. Louis Howard
Project Manager
Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
555 Cordova Street
Anchorage, AK 99501-2617

**Subject: Letter Report and Conditional Closure Request
Public Health Service Project Soil Pile/non-TPA Site 34
St. George Island, Alaska**

Dear Mr. Howard:

This letter report provides a summary of confirmation sampling and analysis of soils excavated during an upgrade to the City of St. George, Alaska sewer system (ca. 1986). These soils were presumably piled at a location currently referred to as National Oceanic and Atmospheric Administration (NOAA) non-Two Party Agreement (TPA) Site 34 or Site 34 (56° 36' 6.01" N, 169° 32' 18.76" W; Figures 1 and 2). Included herein are a summary of sampling activities, maps and photographs of the sampling location, and fixed-laboratory sample results. Based on the data and information presented, NOAA is requesting a conditional closure determination from the Alaska Department of Environmental Conservation (ADEC) for this site.

The U.S. Department of Health and Human Services, Public Health Service (PHS) and the City of St. George, under a work order with the PHS, conducted the City of St. George sewer upgrade. The City and the PHS encountered suspected petroleum-contaminated soils (PCS) while upgrading the sewer system. Workers subsequently removed these soils, placing them in a pile at Site 34. This site is located in Tract 52 of Township 41 south, Range 129 west, Section 29 of the Seward Meridian, Alaska, as shown on the plat of rectangular net survey, officially filed February 15, 1985, adjacent to TPA Site 6, also known as Site 6 and the Open Pit Site (Figure 2). The Tanaq Corporation owns the surface estate and The Aleut Corporation owns the subsurface estate of Site 34.

At the urging of the St. George Restoration Advisory Board members, NOAA agreed to characterize the soils suspected to be contaminated. In 2003, NOAA working with Alvin Mercurief, Mayor of the City of St. George, identified the pile believed to have come from the PHS project (Figures 3 and 4). NOAA subsequently estimated the volume of the pile at 540



cubic yards using its survey-grade Trimble Total Station 5700 differential global positioning system (GPS). On June 26, 2004, NOAA and Chadux Corporation dug 12 test pits to approximately 3 feet below ground surface at the suspected PCS pile and collected screening samples. Samples were analyzed for diesel-range organics (DRO) by thin-layer chromatography at NOAA's laboratory in Seattle, Washington. Thin-layer chromatography results indicated that DRO concentrations did not exceed the ADEC Method Two cleanup level (ADEC 2003¹) of 250 mg/kg in any samples.

On July 16, 2004, NOAA and Chadux Corporation collected 12 confirmation samples and 2 duplicate samples from the locations of the 12 previously excavated test pits according to an ADEC-approved sampling plan (Figure 3; NOAA 2004²). The test pits were left open following the June 26, 2004 characterization sampling; thus, confirmation soil samples were collected from 18-24 inches below the exposed soil surface. Consistent with NOAA's Master Quality Assurance Plan (NOAA 2003³), the samples were homogenized and field preserved, as appropriate, and placed in an appropriate type of jar for subsequent fixed-laboratory analysis at SGS Environmental Service Inc. (Anchorage, Alaska), an ADEC-approved laboratory. Samples were stored and shipped at 4 ± 2 °C. All samples were analyzed for gasoline-range organics (GRO), DRO, residual-range organics (RRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX) consistent with NOAA's Master Quality Assurance Plan.

NOAA surveyed all sampling locations using its survey-GPS equipment. Sample locations and results have been added to NOAA's Pribilof Project Office database.

NOAA applied ADEC Method Two cleanup criteria, discussed at 18 AAC 75.341(c) (ADEC 2003⁴). For benzene, under the TPA (NOAA 1996⁵), NOAA had the option to cleanup to the less stringent State of Alaska cleanup level of 0.5 mg/kg in effect in 1991 (ADEC 1991⁶). Validated fixed-laboratory results indicated that no analytes exceeded their site cleanup levels (Table 1). Accordingly, NOAA does not plan to conduct a remedial action at this site.

In accordance with paragraph 59 of the TPA, NOAA requests written confirmation that NOAA completed all appropriate action at the PHS project soil pile, NOAA non-TPA Site 34/Site 34 in accordance with the Agreement and that ADEC grant a conditional closure not requiring further action from NOAA. NOAA understands ADEC will/may require additional containment, investigation, or cleanup if subsequent information indicates a level of contamination at the site that does not protect human health, safety, or welfare, or the environment.

¹ Alaska Department of Environmental Conservation (ADEC). 2003. 18 AAC 75, Articles 3 and 9. *Oil and Hazardous Substances Pollution Control Regulations*. State of Alaska. Effective date January 30, 2003.

² National Oceanic and Atmospheric Administration (NOAA). 2004. *Final Confirmation Sampling Plan, Open Pit Site – Two-Party Agreement Site No. 6/Site No. 6, St. George Island, Alaska*. July 14.

³ NOAA. 2003. *Master Quality Assurance Plan*. Pribilof Islands Environmental Restoration Project. National Oceanic and Atmospheric Administration, Pribilof Project Office. April.

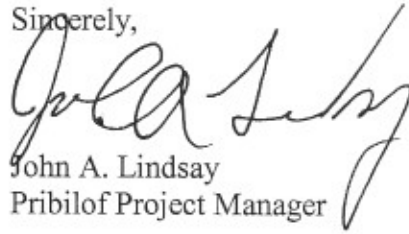
⁴ Alaska Department of Environmental Conservation (ADEC). 2003. 18 AAC 75, Articles 3 and 9. *Oil and Hazardous Substances Pollution Control Regulations*. State of Alaska. Effective date January 30, 2003.

⁵ NOAA. 1996. *Pribilof Islands Environmental Restoration Two-Party Agreement*, Attorney General's Office File No. 66 1-95-0126. National Oceanic and Atmospheric Administration. January 26.

⁶ ADEC. 1991. *Interim Guidance for Non-UST Contaminated Soil Cleanup Levels, Contaminated Sites Program*. July 17.

Please contact me at (206) 526-4560 if you have questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Lindsay". The signature is fluid and cursive, with the first name "John" being the most prominent.

John A. Lindsay
Pribilof Project Manager

Attachments: Table 1
 Figures 1-4

cc: St. George Restoration Advisory Board members

Table 1. Analytical Data for Soil Confirmation Samples^a, NOAA Site 34, non-TPA, St. George Island, Alaska

Sample ID	Benzene	Toluene	Ethyl-benzene	Total Xylenes ^b	Gasoline-range Organics	Diesel-range Organics	Residual-range Organics
SG06-CS-001-040	0.0217 U	0.0869 U	0.0869 U	0.1738 U	4.34 U	52.3	538
SG06-CS-002-050	0.0297 U	0.119 U	0.119 U	0.238 U	5.95 U	59.3	710
SG06-CS-003-050	0.0293 U	0.117 U	0.117 U	0.238 U	5.86 U	29.3	308
SG06-CS-003-250 ^c	0.0238 U	0.0952 U	0.0952 U	0.1904 U	4.76 U	46.5	478
SG06-CS-004-040	0.0221 U	0.0882 U	0.0882 U	0.1764 U	4.41 U	37.2	359
SG06-CS-005-040	0.026 U	0.104 U	0.104 U	0.208 U	5.2 U	40	418
SG06-CS-006-050	0.0278 U	0.111 U	0.111 U	0.222 U	5.56 U	64.5	651 J
SG06-CS-006-250 ^d	0.0263 U	0.105 U	0.105 U	0.21 U	5.26 U	143	1090
SG06-CS-007-050	0.017 U	0.0741 U	0.0682 U	0.1154 UJ	3.41 UJ	21.6 J	216
SG06-CS-008-030	0.0161 U	0.0646 U	0.0646 U	0.108 UJ	3.23 UJ	34.9	143
SG06-CS-009-060	0.021 U	0.084 U	0.084 U	0.168 U	4.2 UJ	9.81 J	55.9
SG06-CS-010-020	0.0224 U	0.0894 U	0.0894 U	0.1788 U	4.47 U	29.4	356
SG06-CS-011-020	0.0184 U	0.0734 U	0.0734 U	0.1468 U	3.67 U	27.2	282
SG06-CS-012-020	0.0325 U	0.13 U	0.13 U	0.26 U	6.5 U	42.2	597
Trip Blank	0.0344 U	0.138 U	0.138 U	0.276 U	6.88 U		
<i>Method Two Cleanup Level^e</i>	0.5 ^f	5.4	5.5	78	300	250	10,000

^a All concentrations in milligrams per kilogram

^b o-xylene and p&m-xylene were analyzed separately. Results were added together for total xylenes and any data flags were retained.

^c Sample is a duplicate of SG06-CS-003-050.

^d Sample is a duplicate of SG06-CS-006-050.

^e Unless otherwise indicated, cleanup level is from Title 18 of the Alaska Administrative Code 75, Oil and Hazardous Substances Pollution Control Regulations, effective date January 30, 2003.

^f For benzene, under the Two-Party Agreement, NOAA had the option to cleanup to the less stringent 1991 State of Alaska cleanup level of 0.5 mg/kg.

U Indicates the analyte was analyzed for but not detected. The concentration listed is the reporting limit.

J The quantitation is an estimation.

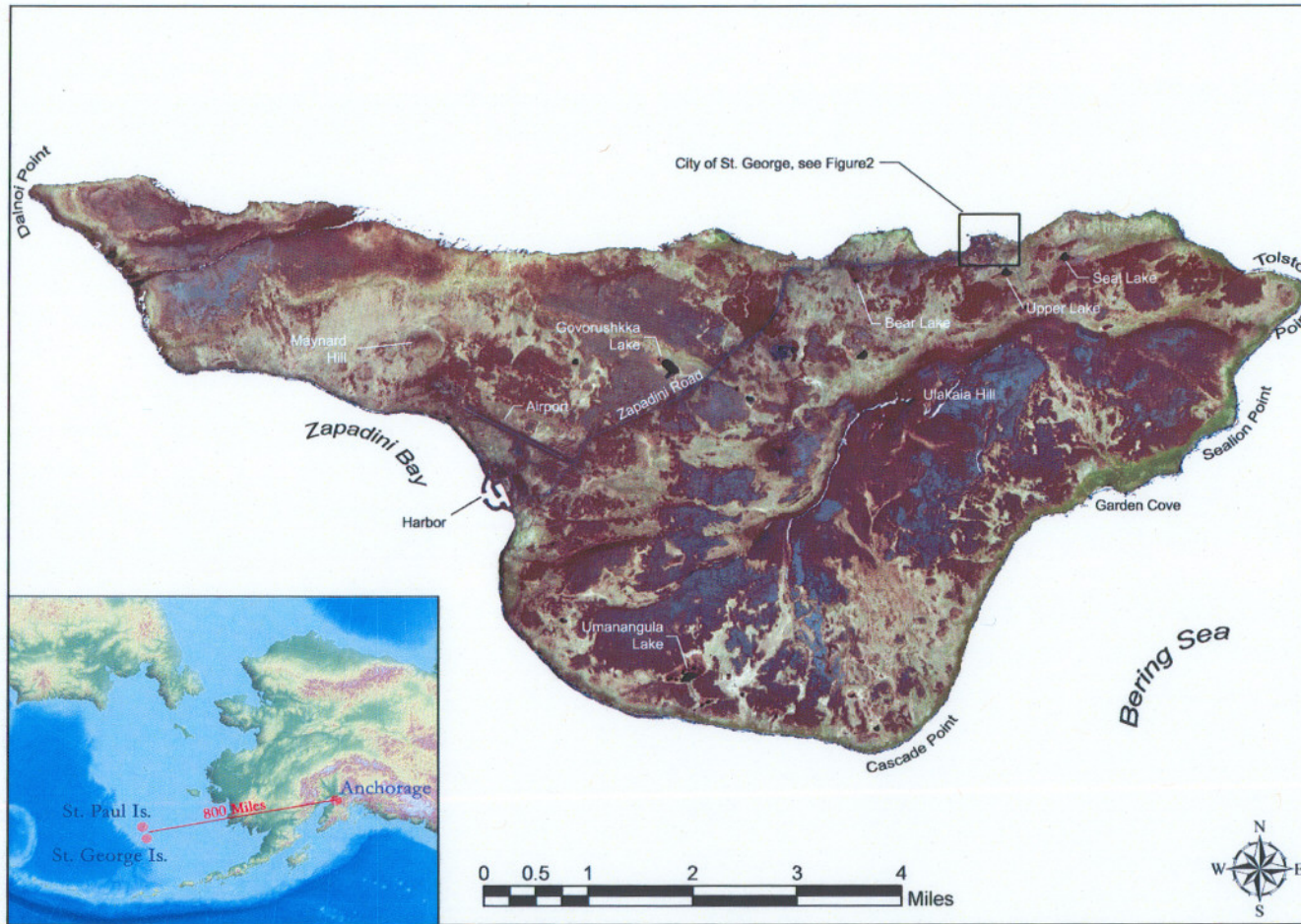


Figure
1

**St. George Island Vicinity Map
Public Health Service PCS Stockpile
NOAA Site 24/Non-TPA
St. George Island, Alaska**

Source: Ikonos 2001 Satellite Image





Figure
2

**Legal Property Description Map
Public Health Service PCS Stockpile
NOAA Site 34/Non-TPA
St. George Island, Alaska**

Source: AeroMap U.S. 9/28/96 Aerial Photograph; Bureau of Land Management Land Survey Filed February 15, 1985



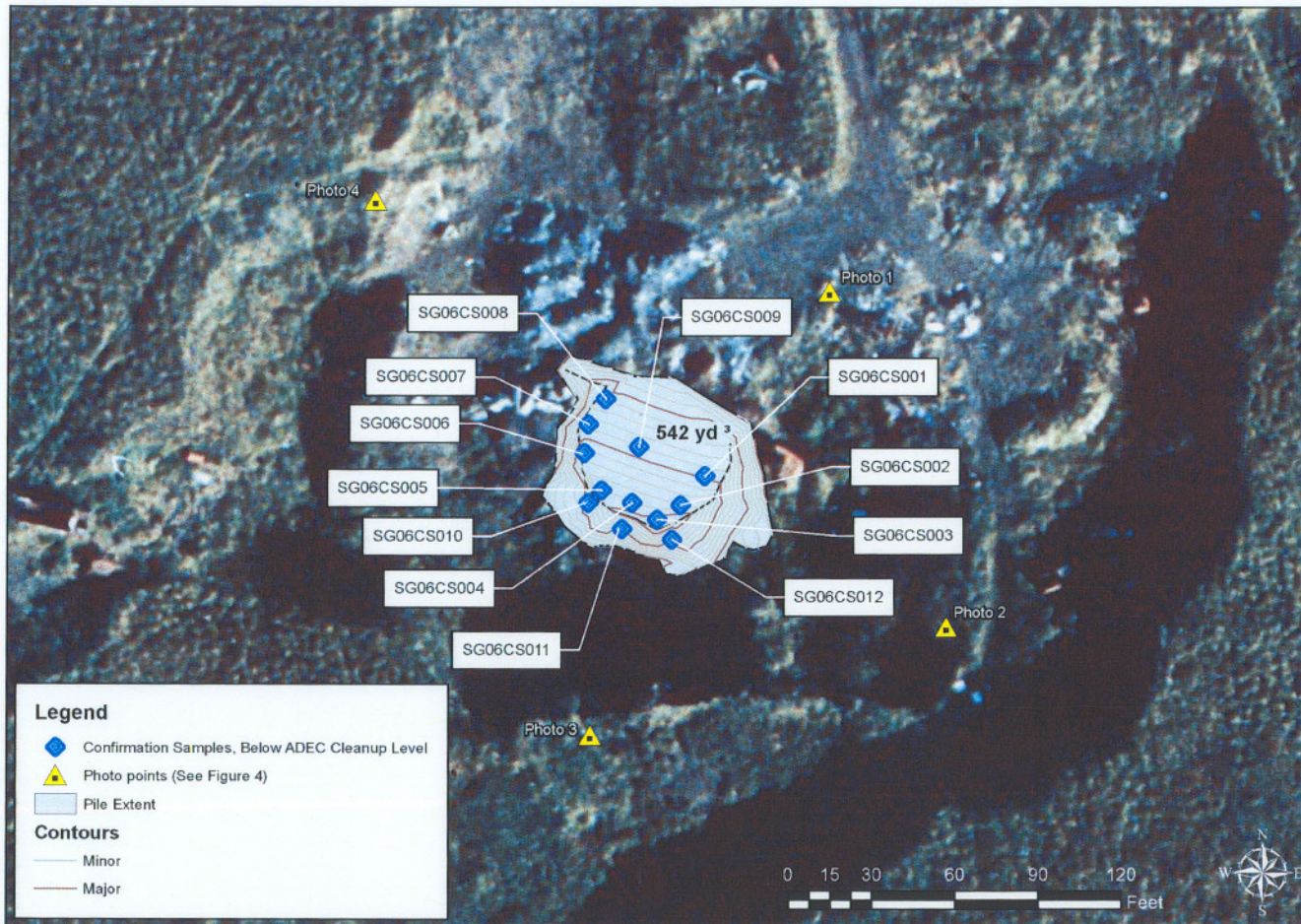
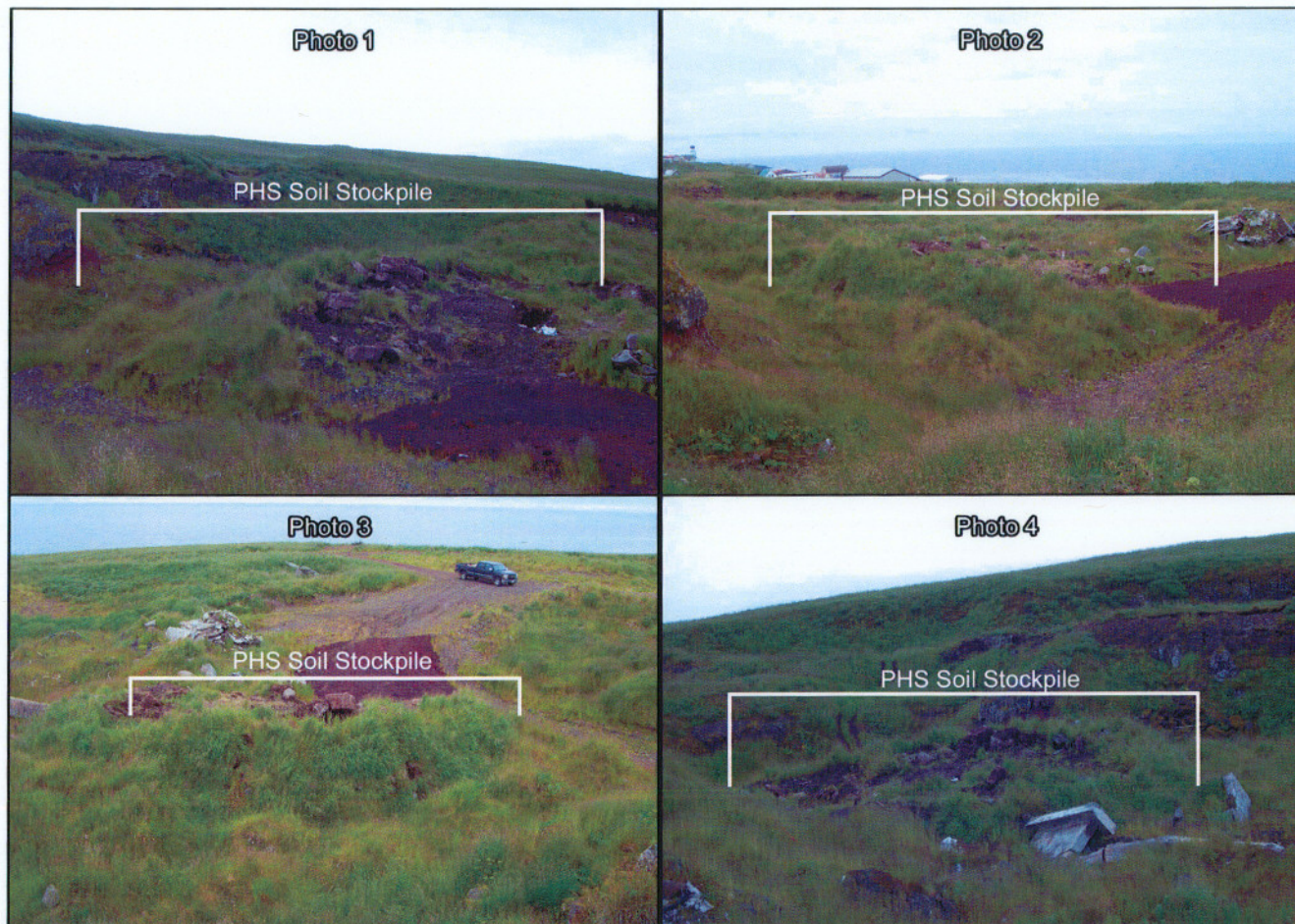


Figure
3

**Confirmation Sample Location Map
Public Health Service PCS Stockpile
NOAA Site 34/Non-TPA
St. George Island, Alaska**

Source: GPS Survey of Soil Completed by Pribilof Project Staff May 2004;
Photos & Photo Location Survey Completed by Pribilof Project Staff August 7, 2004.





Figure

4

**Public Health Service PCS Stockpile
NOAA Site 34/Non-TPA
St. George Island, Alaska**

Photos Taken by Pribilof Project
Staff August 7, 2004. See Figure
3 for Map of Photo Locations

