

Pribilof Islands Restoration Advisory Board Meeting Notes

St. George, Alaska

November 9, 2006

Co-Chairs: Mr. Alvin Mercurief (City of St. George) and Mr. Bernie Denno (National Oceanic Atmospheric Administration [NOAA])

Participants

Ellen Clark, NOAA

Bernie Denno, NOAA

Karin Holser, community member

Louis Howard, Alaska Department of Environmental Conservation (ADEC)

Andy Kashevarof, Tanaq

John Lindsay, NOAA

Steven McCain, Chemtrack

Alvin Mercurief, City of St. George

Chris Mercurief, St. George Traditional Council

Paula Souik, NOAA

Jim Wright, NOAA

Welcome and Introductions

- Alvin Mercurief called the meeting to order at 2:15 pm. Restoration Advisory Board (RAB) members did not request any additions to the agenda.

Distribution of March RAB Notes for Review and Approval (Co-chairs)

- Following a brief discussion, Alvin Mercurief asked to table the approval of the meeting notes from the March 2006 agenda until the next time the St. Paul and St. George RABs are convened together in Anchorage. The motion was seconded and approved.

Oceanfront Sites Cleanup (Wright)

- Jim Wright showed a figure of the oceanfront areas excavated this field season.
- Excavation of petroleum-contaminated soil (PCS) at Two Party Agreement (TPA) Sites 1 and 2 is complete. One hot spot area at TPA Site 25-1 still requires removal. NOAA will complete work at TPA Site 25-1 in 2007 provided funding is available.
- Accomplishments include the removal of 16,000 cubic yards of PCS. NOAA's estimate had been that 13,500 cubic yards required removal.
- A dilapidated trailer was removed from the site in order to clear the area for excavation.
- NOAA estimates remaining hotspot at TPA Site 25-1 will require the removal of up to 2,000 cubic yards.
- Portions of Two Party Agreement (TPA) Sites 1 and 2 could not be excavated because they were at refusal (bedrock), under the road, or near utilities that could not be properly located prior to excavation.
- Generally, excavation continued until encountering bedrock, septic systems, or groundwater or until sample results indicated the soil was below cleanup levels. Also, the excavation was halted at a line parallel to the shore, several feet south of where the bank drops off to the rocky beach to maintain a buffer of consolidated soil that will better resist erosion in the event of a storm surge.

- At TPA Site 1 groundwater was encountered at about 15 feet below ground surface.
- In some areas where screening and lab results showed an exceedance of the cleanup level, it was not feasible to further excavate (e.g., due to refusal, the septic system, the shoreline buffer, and utilities).
- During excavation, several old, crushed, empty drums were unearthed.
- The 16,000 cubic yards of PCS removed from the sites was spread at the new city landfill to a depth of about 5 feet. This PCS had an average diesel concentration of 2,703 ppm.
- The computer model NOAA used to show that groundwater would not be impacted calculated that soil contaminated at 3,478 ppm diesel could be spread to a maximum thickness of 5.7 feet. The depth and concentration of PCS NOAA placed at the landfill are less than these amounts; therefore, the landspread PCS should not contaminate the groundwater.
- The model accounts for some petroleum contamination dissolving into groundwater and some evaporating. It does not take into account natural breakdown (biodegradation), which would further reduce the ability of the petroleum contamination to reach the groundwater.

Question: What is the cleanup level to which NOAA must remove contamination?

Response: The soil cleanup levels are 250 parts per million (ppm) diesel range organics and 300 ppm gasoline range organics.

Question: What ambient temperature does the model assume?

Response: Jim Wright said that the model assumed temperatures based on actual weather data on the Pribilof Islands.

Question: How deep can evaporation [volatilization of petroleum constituents] occur?

Response: Jim Wright stated that he was not certain about the depth of evaporation.

Question: Will moving of the PCS for use as day cover increase the rates of evaporation?

Response: Yes, the evaporation rates will increase if the soils are moved around.

Summary of Findings of Oceanfront Sites Archeological Investigation (Souik)

- As per the National Historic Preservation Act, NOAA consulted with the State Historic Preservation Office to determine if any adverse effects would result from activities/remediation at the oceanfront sites on St. George Island.
- NOAA hired an archeologist (Charles M. Mobley and Associates) to conduct a pre-remediation investigation of the site. The goal of the investigation was to determine the potential for disturbing significant archeological deposits during NOAA's cleanup activities. The findings would dictate whether NOAA needed an on-site archeological monitor throughout the duration of cleanup activities.
- Dr. Charles Mobley conducted a field investigation on St. George in June 2006.
- Dr. Mobley dug eight test trenches (five in the area of TPA Sites 1 and 2 and three near TPA Site 25-1), and the contents of the excavations were examined for artifacts.
- Items unearthed included a hatchet head, glass pieces, ceramic shards, seal bones, steel rod and rake fragment, leather scraps, and small jar with yellow liquid.
- Items were sealed in plastic bags and returned to the trench in which they were found.
- Some items appeared to be recently deposited based on the shallowness of where they were found.
- The investigation found that the oceanfront area was previously disturbed during the construction of the tank farm and drum storage pad. These disturbances mean that artifacts may have been moved from their original context, causing a loss of integrity.

- In his investigative conclusions, Dr. Mobely judged the archeological deposits not to be significant or contributing to the Seal Islands National Historic Landmark. Therefore, he further concluded that NOAA's cleanup actions on the oceanfront should have no effect on cultural resources and no archeological monitoring during cleanup actions is required.
- As such, NOAA was able to proceed with its work at the oceanfront sites without having an archaeological monitor on site.

Interim Landfill Closure and Relocation of NOAA's PCS Stockpile (Wright)

- NOAA contracted with the City of St. George to remove the remaining PCS at the former enhanced thermal conduction system (ETC) stockpile.
- The city transported 6,490 cubic yards of PCS from the ETC site to the "ash cell" area on top of the old landfill. Although the old landfill had already been capped and closed, the city had continued to operate in a small portion of the landfill for open burning.
- Burned debris in the old landfill ash cell was smoothed out and then capped with PCS.
- The PCS was also spread over other parts of the previously capped old landfill; the area where the PCS was spread is smaller than the original cap.
- The old landfill is now capped and closed.
- NOAA has begun the removal of the remnants of the liner from the ETC stockpile. Liner will be disposed in the new city landfill per recent permission from city.
- The ETC stockpile site was constructed using two liners with 6 inches of bedding material between them, making both the construction and removal challenging.
- Presently, the site is being backfilled with sand from the harbor. It will also be topped with scoria and returned to grade before the end of the 2006 field season.

Question: Is NOAA going to reseed the entire area?

Response: Yes, NOAA plans to reseed it next spring.

St. George Free Product Removal (Wright)

- NOAA is preparing a scope of work for two free product collection systems in the village.
- One collection system with two recovery wells is planned for the oceanfront. The other collection system will consist of four wells around the municipal building.
- Jim Wright showed a figure of recovery well locations illustrating how the recovery wells will connect with each other, a pump, and a recovery drum.
- It is not certain how long the systems will operate as it depends on how much free product the collection systems continue to gather. Also, if the pump can operate in a heated, dry building it will allow year round operations. Potentially, pumping equipment and recovery drums can be placed in the carpenter shop and the municipal building.
- It does not seem as though there is much free product to be removed from the oceanfront sites based on what was seen during this year's corrective actions at those sites. Jim Wright commented that wind had blown sheen to one end of the excavation and dipping a vial into the layer of water and oil resulted in ¼ of an inch or less of free product in the vial. This result suggested that the free product layer atop the exposed groundwater in the excavation was less than ¼ inch thick.

Question: Can the recovered product be reused?

Response: NOAA does not believe that the product will be usable.

Long-Term Groundwater Monitoring (Wright)

- NOAA will monitor 10 wells around the area of the recovery wells twice per year for at least five years to ensure that the product is not migrating.
- After five years, NOAA will have to reevaluate whether sampling is necessary, and if so, develop a new sampling plan.
- NOAA contracted Tanaq to collect two rounds of groundwater samples in the first year. Tanaq completed the first round in October, but some resampling is needed because samples froze causing their jars to break open.
- Another contract will be competed for out-year monitoring efforts.
- NOAA instructed Chemtrack not to excavate within one foot of groundwater level at oceanfront sites, except at selected spots to estimate the potential relative volume of free product available for recovery. NOAA restricted the limit of excavation because the most highly contaminated soil occurs right at the level of the groundwater, and NOAA is concerned that the DRO levels of this soil could exceed the 3,478 ppm level assumed in the mathematical model. If too much of this soil were removed and spread at the new landfill, it could have invalidated the model results, perhaps increasing the potential to contaminate groundwater.

Status Summary for all St. George TPA Sites and Planned 2007 Cleanup Activities (Lindsay)

- John Lindsay kept his summary brief because Jim Wright had just provided several updates.
- NOAA plans to complete the remediation of the oceanfront site; NOAA estimates the remaining hotspot at TPA Site 25-1 is 3,500 cubic yards or less of contaminated soil.
- NOAA is currently working to close out the ETC stockpile site and it plans to revegetate the area.
- NOAA will conduct free product removal.
- After these efforts, NOAA then hopes remediation efforts on St. George will be complete. Just today, however, Andy Malavansky pointed out a buried drum in the road just south of Dennis Lekanof's house. Jim Wright commented that this sounds similar to the type of drums they found at the oceanfront sites with squares cut out of the ends. He thought they were installed laid end to end, with the tops and bottoms cut out to make a pipeline. This pipeline may have been used to drain the "ballfield" area.
- Long-term monitoring will continue for some amount of time. NOAA's Safety and Environmental Compliance Office (Bernie Denno) will oversee the long-term monitoring efforts.

Transfer of NOAA-Owned Equipment to St. George Entities (Chris Merculief)

- A newly formed St. George joint use committee, comprised of representatives from the City of St. George, the Traditional Council, and Tanaq, developed a letter of resolution regarding the receipt of excess NOAA equipment after NOAA finishes island work. Chris Merculief read the resolution to the RAB. The resolution requests that NOAA transfer vehicles and heavy equipment to the St. George entities to enable them to provide community maintenance and services. The resolution outlined a community shared use and maintenance plan. The Traditional Council has already approved the resolution.
- John Lindsay noted that he is not able to make a decision regarding this resolution. The typical process of excessing equipment requires that it be offered to other federal government entities, then to state agencies, municipalities/tribes, etc. It is not typical that private entities are able to receive such equipment from the government.

- John sought further clarification regarding who would receive the equipment, whether it would be overseen and used collaboratively, and whether the equipment would benefit the community at large. John questioned whether the equipment would be beneficially used for the good of the whole. John wanted clarification/assurance that the entities would be working together and that they would not be competing against one another for the use of the equipment. John stated that his understanding is that it should be going for the public benefit, not for private enterprise.
- Chris noted that some of these issues have not been fully discussed and would need to be flushed out further. Chris also noted that the entities have no choice right now but to work with one another. His idea would be to have a combined maintenance account that each entity pays into.
- John said though he expects to complete remediation efforts in 2007, there are further steps to be taken before the cleanup is officially closed; NOAA must gain final approval from the State of Alaska and then the Secretary of Commerce, before cleanup is officially closed. Excessing equipment to the local entities may be possible after final approval of NOAA's cleanup actions.
- Andy Kashevarof noted that the demobilization costs would be high and that there could be a role for Tanaq to take care of the equipment until NOAA is able to officially excess the equipment.
- John noted that his recommendation would be to provide the equipment to the three entities should they agree to work with one another to jointly use the equipment.
- Chris commented that the Traditional Council is slowly building infrastructure and stands to benefit from a joint agreement. He sees that the city, Tanaq, and the tribe have no choice but to work together. He wanted NOAA to know that all entities involved are making sure the equipment and vehicles would be covered by insurance.
- John explained that NOAA has been fairly liberal with the use of equipment in the past but that NOAA is becoming stricter with the use and management of government equipment. These rules will impact his ability to respond to this specific request.
- Bernie Denno asked that the resolution, read by Chris, be signed, finalized, and sent to him or John Lindsay.

Question: If NOAA owns the equipment but allows others to use it, do those operators have to have commercial driver's licenses (CDLs)?

Response: Yes, all of us have to comply with federal regulations.

Preserve America Initiative Display (Souik)

- During this past summer, the interpretive signage and materials developed with funding from a NOAA Preserve America Initiative mini-grant were on display in the Sealing Plant. The display has been put away for the winter to allow for the storage of the NMFS vehicles but will be set up again next summer.
- Paula Souik noted that the goal is to ensure that the display remains on island for use by the locals in perpetuity.

Question: Can St. George go after another grant of this type?

Response: Paula noted that the NOAA committee would likely want to see St. George apply for Preserve America Community designation prior to applying for additional grants to show signs of long-term dedication to historic preservation. John Lindsay noted that the city needs to apply for this designation. [Note: The Traditional Council may also apply.]

Public Comments

Question: What does project funding look like for FY2007?

Response: John Lindsay responded that President Bush's request was \$7.2M, but NOAA has not yet received a final appropriation.

Question: What other activities do you have on St. Paul?

Response: John Lindsay explained that there are some property remediation efforts requiring completion, and there is the potential issue of demolishing buildings and removing contamination beneath their foundations.

Comment: NOAA is restoring five buildings on St. Paul.

Response: NOAA is abating hazards in six buildings on St. Paul. NOAA is conducting this work because it is necessary prior to the transfer of residential or child-occupied properties and because of laws regarding residences built prior to 1950.

Question: Could the government remediate buildings on St. George that have already been transferred? These buildings have the same hazards as those NOAA is abating on St. Paul.

Response: Bernie Denno explained that many of the laws regarding lead/asbestos did not come into effect until after the St. George properties were transferred. It would take an act of Congress to require NOAA to abate the previously transferred buildings. NOAA is working with the Aleutian/Pribilof Islands Association (APIA) to provide outreach to the community regarding hazards.

Question: How much clean material was previously stockpiled for use as backfill material?

Response: Jim Malchow would know the exact figures. It was supposed to be enough to complete backfill, perhaps 13,000 cubic yards.

Comment: Andy Kashevarof commented that Tanaq will need a good estimate of what NOAA has used for backfill purposes when NOAA is done with backfill activities.

Question: Once the new landfill opens, is there some equipment that gets transferred to the city?

Response: No, not until NOAA is done with the equipment.

Question: Karin Holser noted her concern with the integrity of the city hanger and the hazardous materials within. Karin recommended the drums in the hanger be placed in overpacks and shipped off island.

Response: John Lindsay noted that this is a city property, and NOAA does not have the authority or responsibility to address the contamination within.

Closing Remarks; Tentative Date for Next Meeting

- The group discussed holding a joint St. Paul/St. George meeting in Anchorage during September 2007.
- The meeting was adjourned at 4:01 pm.