

STATE OF ALASKA

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

SEAN PARNELL, GOVERNOR

Post Office Box 1542
Haines, Alaska 99827
PHONE: (907) 766-3184
FAX: (907) 766-3185
<http://www.state.ak.us/dec/home.htm>

July 7, 2010

Mr. Michael McCrum
US Bureau of Land Management
222 W 7th Ave, # 13
Anchorage, AK 99513

Re: BLM-lead Consumption Survey
BLM Red Devil Mine, Red Devil, Alaska

Dear Mr. McCrum:

The Alaska Department of Environmental Conservation (DEC) has received and reviewed the information that you provided regarding the Alaska Department of Fish & Game subsistence harvest survey that is being conducted in the Kuskokwim in villages near, and including, Red Devil.

During the April 2010 technical meeting for the development of the Red Devil Mine Remedial Investigation/Feasibility Study (RI/FS) work plan, participants from the Bureau of Land Management (BLM), Ecology and Environment (E&E), Environmental Protection Agency (EPA), Alaska Department of Health and Social Services (HSS) and DEC discussed the need for a consumption survey of the residents of Red Devil to determine what subsistence resources were used from or near the site and gather more accurate ingestion rates of subsistence resources for use in the risk assessment. BLM agreed to fund the development of a house-to-house consumption survey for Red Devil residents by E&E in collaboration with DEC and HSS which would be implemented by BLM staff in consultation with DEC and HSS. Following this commitment, BLM learned of a subsistence harvest survey in the Middle Kuskokwim River area. BLM informed DEC and EPA of its desire to use the survey during the June 14th site visit and provided a copy of the survey questionnaire and a PowerPoint presentation explaining the purpose and timing of the survey on June 18th.

Although the ADF&G survey is very comprehensive regarding subsistence harvest in the area, we have concerns regarding its use as the sole source of information. Therefore, we request that BLM develop a supplemental consumption survey in collaboration with DEC and HSS targeted toward subsistence resource use in the area of the site and site usage including frequency and duration of visits. We believe that discussions brought about by the survey questions could be very helpful in capturing current exposure pathways and subsistence ingestion rates. For example, it was learned during the public meeting in a conversation with the Wilmarth boys that they like to catch grayling in Red Devil Creek. The frequency of the activity, number and size of fish caught, and if the fish are eaten are the types of questions which need to be answered. Other sources of area subsistence consumption information such as a HSS Donlin Creek survey currently underway may also prove valuable in assessing potential future subsistence use representing a larger survey population and potentially minimizing the suppression effect (diminished consumption rate from baseline due to site-specific considerations such as resource depletion, fear of contamination, or accessibility). A primary objective of the additional survey questions should include the development of an upper bound estimate of the consumer only media consumption rate. Additional specific data to be collected should include

what resources are consumed, what specific parts are consumed (e.g. fillets, whole body, organs), and how they are prepared (e.g. smoked, dried, fish stews, etc.).

In order for the ADF&G harvest survey to be most beneficial to the Red Devil RI/FS effort, E&E will need to be provided the raw survey data as ADF&G will be analyzing different parameters to satisfy different objectives. Recently, I spoke with James Van Lanen of ADF&G who conducted the Red Devil survey interviews last January. He stated that some residents of Sleetmute as well as residents located between Red Devil and Sleetmute discussed using the mine area for subsistence harvest, specifically for blueberry picking, but also mentioned that hunting of rabbits and grouse was common in the area. He strongly recommended evaluating the Sleetmute survey data as well as including those residents in the BLM household surveys. He was not familiar with the Crooked Creek data as that was collected by a separate survey team; however he also recommended reviewing the data to determine if residents travel to the Red Devil area for gathering subsistence resources. Therefore, we request that BLM evaluate the raw survey data from Red Devil, Crooked Creek, and Sleetmute. Both DEC and HSS would like to receive copies of the raw survey data as well.

Given the recent information learned by DEC regarding subsistence use of the site area by residents of Sleetmute, we also request that BLM include both Red Devil and Sleetmute villages as well as the residents living between the villages in its survey. If further investigation yields information that residents of Crooked Creek also use the site, then that community should be added as well.

As previously discussed, we would be happy to assist E&E staff to develop a survey tool which specifically addresses our concerns regarding site-area subsistence resource use as well as site use. HSS has suggestions on appropriate tools that may be modified to meet our site specific needs. Given the need to develop and implement the survey fairly quickly so that the information can be used in the risk assessment this fall, we suggest holding a teleconference between E&E, HSS, and DEC staff within the next week or so to begin to develop the survey questions. Prior to implementation of the BLM survey, both DEC and HSS would like to review it to ensure agreement that the results will meet the needs of the risk assessment and RI/FS. DEC and HSS would also like the opportunity to assist BLM in conducting the site-specific survey providing their human health risk assessment and public health expertise.

We look forward to continuing to work with you on the cleanup of this site. If you have any questions, please do not hesitate to contact me at 766-3184.

Sincerely,



Anne Marie Palmieri
Environmental Specialist

cc: Matt Wilkening, EPA
Lori Verbrugge, HSS
Marty Brewer, DEC-Anchorage
Jennifer Roberts, DEC-Anchorage