

## 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

August 20, 2010

Mr. Mike McCrum U.S. Bureau of Land Management 222 West 7<sup>th</sup> Avenue, #13 Anchorage, Alaska 995137504

Re: Remedial Investigation/Feasibility Study Work Plan Red Devil Mine, Red Devil, Alaska

Dear Mr. McCrum:

The purpose of this letter is to provide a timeframe for the Alaska Department of Environmental Conservation's (DEC) review of the *Remedial Investigation/Feasibility Study (RI/FS) Work Plan*, prepared by Ecology and Environment (E&E) and dated August 2010. This work plan was provided to DEC via downloadable format from the E&E ftp site on Wednesday, August 18, 2010 at 1:45pm.

On August 19<sup>th</sup>, Jennifer Roberts notified Ted Murphy that DEC would not be able to review and approve the August 18<sup>th</sup> work plan within the three (3) day time period needed for E&E to mobilize to the field on August 23<sup>rd</sup>. She also stated that we would provide comments within a 30-day review time period. As we have previously discussed, I will be out of the office from August 23<sup>rd</sup> – September 3<sup>rd</sup>. DEC can provide comments on the August 18<sup>th</sup> work plan by September 13<sup>th</sup>.

If the Bureau of Land Management (BLM) elects to implement the field work prior to receiving DEC approval of the work plan, BLM will risk that DEC will reject the results and request additional work. DEC has several issues that are of particular concern and want to ensure that this field effort captures the correct information and data necessary for decision making. Issues of concern with the implementation of the August 18<sup>th</sup> work plan which would ensure that additional work would be needed include the lack of PCB samples, lack of a correlation study between XRF results and lab data, lack of appropriately collected background sediment samples, lack of adherence to DEC guidance regarding groundwater sampling (stabilization parameters) and total organic carbon samples, and inconsistencies with previously discussed treatment of investigative-derived waste groundwater.

If you have any questions regarding this site, please do not hesitate to contact me at 766-3184 or my supervisor, Jennifer Roberts, at 269-7553.

Sincerely,

Ameluanii Bamini

Anne Marie Palmieri Environmental Program Specialist

5.

cc: Matt Wilkening, EPA Jennifer Currie, Alaska Dept. of Law Jennifer Roberts, DEC-CSP