STATE OF ALASKA,

DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

610 University Avenue Fairbanks, AK 99709-3643 PHONE: (907) 451-2180 FAX: (907) 451-5105 www.dec.state.ak.us

File: 860.38.050 860.38.005

June 8, 2012

Al Weilbacher Building 171 2261 Hughes Ave., Suite 155 Lackland AFB, TX 78236-9853

Re: ADEC determination "Cleanup Complete" for Site Galena Airport UST 1429,

Former Galena Forward Operating Location (FOL), Galena, Alaska.

Dear Mr. Weilbacher:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the Site investigations documented in the Draft Site Inspection Report for the Site Galena Airport UST 1429, Former Galena Forward Operating Location (FOL), Galena, Alaska. Based on the information provided to date, ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

This decision is based on the administrative record for Galena Airport UST 1429, which is located in the offices of the ADEC in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of the site and provides a summary of the regulatory issues considered in the Cleanup Complete Determination.

Introduction

Site Name and Location: Galena Airport UST 1429 Galena Alaska, 99741

Database File Number and Hazard ID:

File: 860.38.050 Hazard ID: 25850

Regulatory Authority:

18 AAC 75.

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Background and Characterization Activities

UST 1429 is a suspected heating-oil tank thought to have provided fuel for Building 1429. Building 1429 was constructed in 1963 and was used to regulate access to the runway near the combat alert cell. In more recent years, the structure was used for warm storage by operations and maintenance personnel (Center for Environmental Management of Military Lands, November 2008). Building 1429 was demolished in 2009. No records of a UST associated with Building 1429 exist; however, similar guard shacks at the Former Galena FOL had associated heating-oil tanks. Central heating system records, dated 1974, indicate that Building 1429 was not connected to the central heating system. Table 3-3 of the Final Environmental Baseline Study Report (U.S. Air Force [USAF], February 2010) lists a diesel UST associated with former Building 1429; however, details about the tank (capacity, years of operation, and status) are unknown. UST 1429 was not registered with the U.S. Environmental Protection Agency (EPA) or Alaska Department of Environmental Conservation (ADEC) and does not have a current ADEC regulatory status. This UST is exempt from UST closure requirements according to 18 Alaska Administrative Code 78.005(e)(5), "tank used for storing heating oil for consumptive use on the premises where stored."

Soil gas and groundwater samples were collected in 2007. Groundwater sample results by methods 8020 and 8260 indicated no contamination above ADEC cleanup levels. This location is currently paved and there is an AST installed directly over top of the historic exceedance. Site UST 1429 was recommended "No Further Action" in the 2011 Preliminary Assessment.

In 2010, Site Investigation work at Site UST1429 was conducted in accordance with an ADEC approved Workplan. The investigation found cuts in pavement that were assumed evidence of a UST removal. A Geophysical survey was undertaken and indicated that no tank or associated piping remained. Target analytes at Site UST1429 were identified in the workplan as gasoline-range organics (GRO); diesel-range organics (DRO); benzene, toluene, ethylbenzene, and xylenes (BTEX); and polynuclear aromatic hydrocarbons (PAHs). Soil samples were also screened for trichloroethene (TCE) and tetrachloroethene (PCE).

A cumulative risk evaluation was completed for the site by comparing the maximum concentrations of detected analytes to one-tenth of the ADEC Table B-1 value for direct contact in the Under 40 inch zone. No analytes detected were above the one-tenth criteria. The Cumulative Cancer and Non-cancer risk was determined to be not applicable since no analytes are considered Chemicals of Potential concern (COPC).

Contaminants of Concern

During the investigations for this site, diesel range organics (DRO), residual range organics (RRO), and semi-volatile organic compounds (SVOCs), benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, fluoranthene, phenanthrene, and pyrene were detected at levels below screening and method 2 clean up levels.

Clean Up Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater.

| Site Cleanup Level (mg/kg) |
|----------------------------|
| 250 |
| 11,000 |
| 2.1 |
| 12 |
| 38,700 |
| 1,400 |
| 3,000 |
| 1,000 |
| |

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

| Contaminant | Site Cleanup Level (mg/L) |
|----------------------|---------------------------|
| DRO | 1.5 |
| RRO | 1.1 |
| Benzo(a)pyrene | 0.0002 |
| Benzo(b)fluoranthene | 0.012 |
| Benzo(g,h,i)perylene | 1.1 |
| Fluoranthene | 1.5 |
| Phenanthrene | 11 |
| Pyrene | 1.1 |

Pathway Evaluation

Following investigation at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Table 1

| Pathway | Result | Explanation |
|-----------------------------|----------------------------|---|
| Surface Soil Contact | Pathway Incomplete | No contamination of surface soils was indicated during investigations. There is no surface soil contact. |
| Sub-Surface Soil Contact | De- minimis exposure | Contamination remains in the subsurface, but is below migration to groundwater levels. |
| Inhalation – Outdoor Air | De- minimis exposure | Contamination remains in the subsurface, but is below migration to groundwater levels. Pavement covers the site soil. |

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| Inhalation – Indoor | Pathway | There are no buildings at the site and any |
|-----------------------|------------|--|
| Air (vapor intrusion) | Incomplete | remaining contamination is below |
| · - | | migration to groundwater levels. |
| Groundwater | Pathway | Groundwater contamination above ADEC |
| Ingestion | Incomplete | cleanup levels was not encountered |
| | | during the investigations. |
| Surface Water | Pathway | There is no surface water located within 1/4 |
| Ingestion | Incomplete | mile of the site. |
| Wild Foods Ingestion | Pathway | There is no surface or subsurface |
| | Incomplete | contamination remaining above migration |
| | _ | to groundwater levels. |
| Exposure to | Pathway | Contaminated soil is not present at |
| Ecological Receptors | Incomplete | surface. |
| i . | 1 | |

ADEC Decision

The investigations to date have adequately characterized contaminated soil at the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. The Release Investigation is complete for this site, any potential risk to human health or the environment is acceptable as it is determined to be below action levels, and any contamination remaining has been evaluated as de-minimus. Based on these findings the site status will be designated "cleanup complete" and the site will be listed as closed on the Department's database.

Although a cleanup complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75.375 (i). It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with the site cleanup rules in 18 AAC 75.325 Article 3 and site closure rules in 18 AAC 75.380 (d). The determination does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final

decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have any questions concerning this closure decision, please do not hesitate to contact the ADEC project manager at (907) 451-2180, or by email at dennis.shepard@alaska.gov.

Approved By,

Fred Vreeman

Environmental Program Manager

Recommended By,

Dennis Shepard

Environmental Program Specialist

cc: Donna Kozak, Booz Allen Hamilton, via email

Win Westervelt, CH2MHill, via email

Andi Lord, CH2MHill, via email

Colette Foster, ADOT&PF, via email

Sam Myers, ADOT&PF, via email