THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

Division of Spill Prevention and Response
Contaminated Sites Program

610 University Ave.
Fairbanks, Alaska 99709-3643
Main: 907.451.5715
Fax: 907.451.5105

File: 890.26.010

March 2, 2015

Elizabeth Andringa
BLM Alaska Fire Service
P.O. Box 35005
Ft. Wainwright, AK 99703-0005

Re: Decision Document: BLM Alaska Fire Service Bettles Station
Cleanup Complete Determination

Dear Ms. Andringa:

The Alaska Department of Environmental Conservation (DEC) has reviewed the environmental records for the Bureau of Land Management (BLM) Alaska Fire Service Bettles Station. The BLM leased the lot at the Bettles airport from the State of Alaska, Department of Transportation & Public Facilities. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

Site Name and Location:
BLM Alaska Fire Service – Bettles Station
Tract 1, Former Parcels A and B (north side of the runway)
Bettles Airport
Bettles, Alaska

DEC Site Identifiers:
File No: 890.26.010
Hazard ID: 24422

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background
The BLM Alaska Fire Service had two 7,200-gallon tanks at the North Ramp of the Bettles Airport that contained jet fuel and aviation gasoline. The tanks were installed in the mid 1970's and were in an open pit, about 50% below ground level.

Contaminants of Concern and Cleanup Levels
The tanks at this site contained jet fuel and aviation gasoline. Cleanup levels were established using the Matrix Score Sheet under Method 1, Category B cleanup level.

Table 1 – Approved Cleanup Level

Contaminant	Soil (mg/kg)
Diesel Range Organics	200
Gasoline Range Organics	100
Benzene	0.1
BTEX (benzene, toluene, ethylbenzene, and xylenes)	10

Characterization and Cleanup Activities

BLM removed the two 7,200-gallon tanks in 1994. Three samples were collected from each pit and analyzed for diesel range organics (DRO). Sample results from the aviation gasoline tank excavation were below the cleanup level. The sample from the west end of jet fuel tank excavation was 2080 mg/kg, above the cleanup level. The other two samples from the jet fuel tank were below the cleanup level.

In 1995, BLM returned to the site and collected additional samples from the tank excavations. The two samples from the aviation gasoline tank excavation were analyzed for BTEX. All results were below the cleanup levels. The two samples from the jet fuel tank were analyzed for DRO. One sample, near the west end, had a result of 1980 mg/kg. The other sample result was below the cleanup level.

BLM planned to remove and treat the estimated 10 cubic yards of contaminated soil at the jet fuel tank excavation, however when they returned to the site later in the summer they discovered that a contractor had used gravel from both tank excavations for a road construction project. The contaminated soil had been spread over three to six miles of road.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC'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 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis	Sample results were below the inhalation and ingestion cleanup levels. The soil from this site was inadvertently used during road construction.
Sub-Surface Soil Contact	De-Minimis	Sample results were below the inhalation and ingestion cleanup levels. The soil from this site was inadvertently used during road construction.
Inhalation – Outdoor Air	Pathway Incomplete	Sample results for volatile compounds were below cleanup levels. The soil from this site was inadvertently used during road construction.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Sample results for volatile compounds were below cleanup levels. The soil from this site

		was inadvertently used during road construction.
Groundwater Ingestion	Pathway Incomplete	Sample results were above the migration to groundwater cleanup level, however the soil from this site was inadvertently used during road construction. Depth to groundwater is 8-15 feet.
Surface Water Ingestion	Pathway Incomplete	There is a gravel pit approximately 250 cubic yards from the site, however the soil from this site was inadvertently used during road construction.
Wild and Farmed Foods Ingestion	Pathway Incomplete	The soil from this site was inadvertently used during road construction.
Exposure to Ecological Receptors	Pathway Incomplete	The soil from this site was inadvertently used during road construction.

Notes to Table 2: "De-Minimis Exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal volume or concentration of remaining contamination. "Pathway Incomplete" means that in ADEC's judgment contamination has no potential to contact receptors. "Exposure Controlled" means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

Approximately 10 cubic yards of petroleum contaminated soil was inadvertently spread over three to six miles of road during construction and is inaccessible for further cleanup. This site will receive a "Closed" designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This determination is in accordance with 18 AAC 75.380 and 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 questions about this closure decision, please feel free to contact me at melody.debenham@alaska.gov or (907) 451-5175.

Sincerely,

Melody Debenham
Environmental Program Specialist

Enclosures: Bettles Airport Property Plan (1987)

cc: Becky Legg-Merrell, ADOT&PF

Becky Legg-Merrell
ADOT&PF - Aviation Leasing
2301 Peger Road
Fairbanks, AK 99709

PROPERTY STATUS

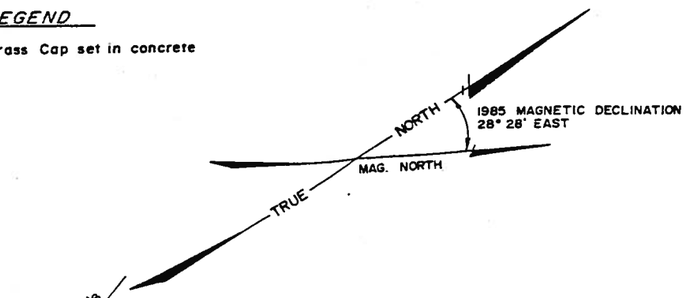
ACT	PARCEL	AREA	INTEREST	DATE ACQUIRED
		613.662 Acres	Omnibus Deed	5/27/66
		36.295 Acres	Avigation & Hazard Easement	8/5/88
		3.811 Acres	Avigation & Hazard Easement	12/15/88
IV		17.111 Acres	Avigation & Hazard Easement	12/12/88

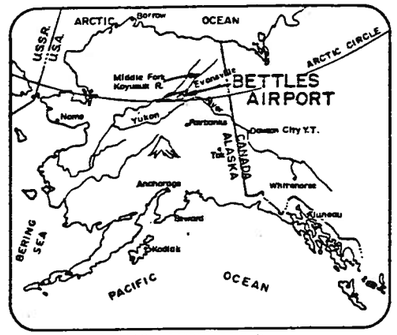
NOTES

1. This property plan supersedes property plan dated 8/31/65.
2. The natural meanders of the line of ordinary high water forms the true bounds of the tract. The approximate line of ordinary high water as shown is for area computations only.
3. No field survey was performed to determine the location of the Koyukuk River meanders. Approximate meanders were located by aerial photography.
4. Monuments as shown are A.D.A. Brass Caps set in concrete according to the drawing "Bettles Airport Horizontal and Vertical Control" dated 2/6/70.
5. The bearings and distances as shown on this drawing are based upon the legal description of Air Navigation Site 268 and the Federal Conveyance of Bettles Airport to the State of Alaska recorded June 15, 1966 in Deeds, Book 193, P.63, Fairbanks Recording District.
6. The relationship between the ℄ runway and the exterior airport boundary was based upon ties as shown on the drawing "Bettles Airport Land Occupancy" dated 10/1/85 by Ellerbe.

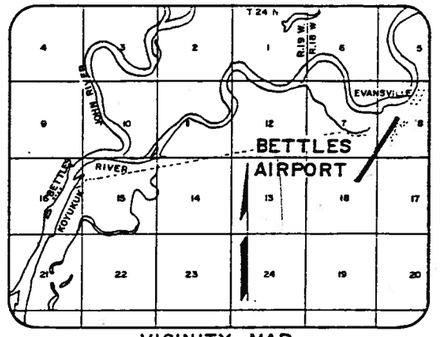
LEGEND

⊕ A.D.A. Brass Cap set in concrete

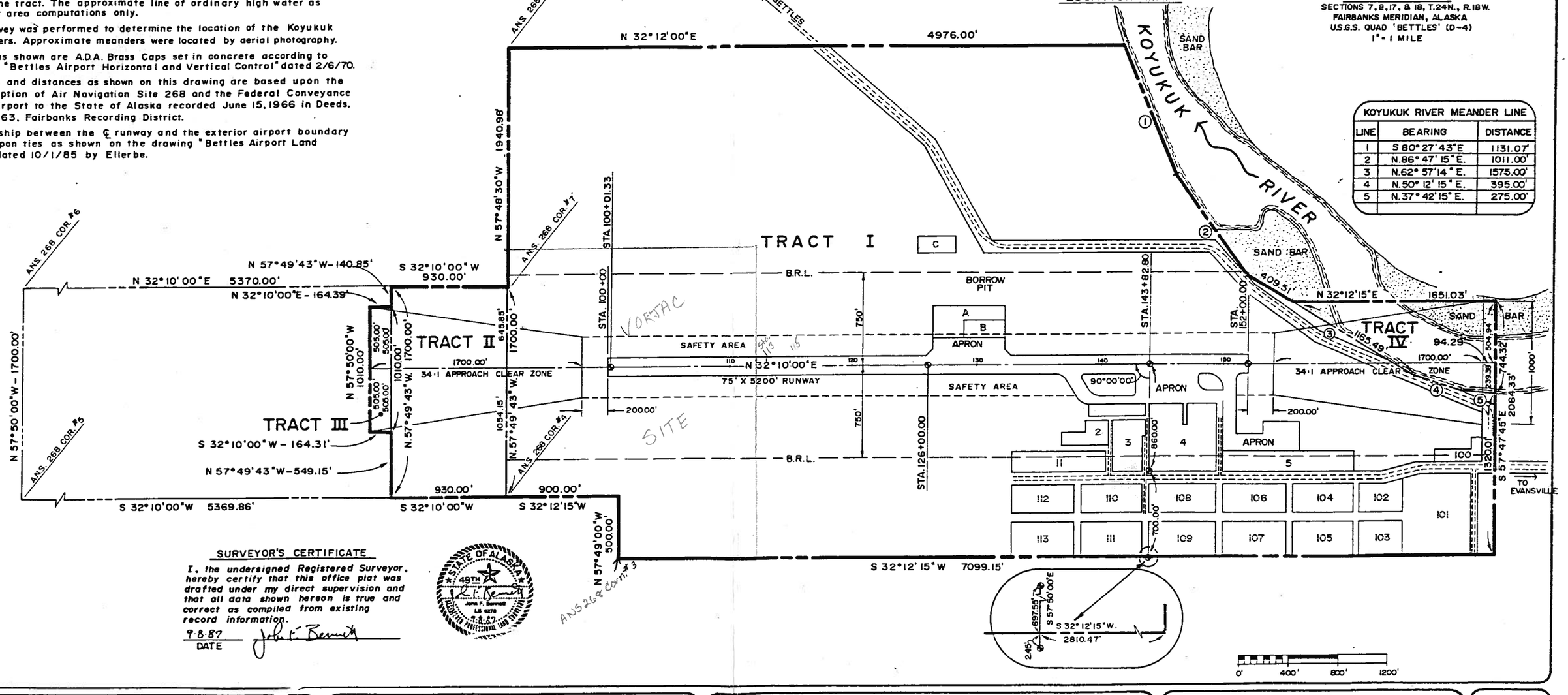




LOCATION MAP



VICINITY MAP
SECTIONS 7, 8, 17, & 18, T.24N., R.18W.
FAIRBANKS MERIDIAN, ALASKA
U.S.G.S. QUAD 'BETTLES' (D-4)
1" = 1 MILE



KOYUKUK RIVER MEANDER LINE

LINE	BEARING	DISTANCE
1	S 80°27'43"E	1131.07'
2	N.86°47'15"E.	1011.00'
3	N.62°57'14"E.	1575.00'
4	N.50°12'15"E.	395.00'
5	N.37°42'15"E.	275.00'

SURVEYOR'S CERTIFICATE

I, the undersigned Registered Surveyor, hereby certify that this office plat was drafted under my direct supervision and that all data shown hereon is true and correct as compiled from existing record information.

9.8.87 DATE — John F. Bennett

STATE OF ALASKA 49TH — John F. Bennett LS 6278 — REGISTERED PROFESSIONAL LAND SURVEYOR — 9.8.87

D.S.	2/12/89	UPDATED DATE ACQUIRED
D.S.	8/16/88	REVISED PROPERTY STATUS TRACT II

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
NORTHERN REGION – DESIGN AND CONSTRUCTION – AVIATION

APPROVED Daniel D. Ubach DATE 9-17-87
DANIEL D. UBACH, P.E. CHIEF, AVIATION DESIGN GROUP

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES
NORTHERN REGION – DESIGN AND CONSTRUCTION

APPROVED R.L. Osgather DATE 870908
R.L. "Bob" OSGATHER CHIEF, RIGHT OF WAY AGENT

BETTLES AIRPORT
PROPERTY PLAN

SCALE: 1" = 400'

SHEET 1 OF 1