



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of  
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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File No: 2320.38.051

October 17, 2016

Gabe Juliussen  
Kenaitze Indian Tribe  
150 North Willow Street  
Kenai, AK 99611

Re: Cleanup Complete Determination, Wildwood AFS ACS MARS Facility Quonset Hut  
(Hazard ID 25210), Kenai, AK

Mr. Juliussen:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the administrative record for the "Wildwood AFS ACS MARS Facility Quonset Hut" (Hazard ID 25210, ADEC File #2320.38.051) site at the Former Wildwood Air Force Station (AFS), Kenai, AK. The review was conducted following a request for site closure submitted by Cook Inlet Environmental, Inc. on October 5, 2016. Based on the information provided, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required unless new information becomes available that indicates residual contaminants may pose an unacceptable risk. 18 AAC 75 is the regulatory authority for this determination.

The "Wildwood AFS ACS MARS Facility Quonset Hut" site (hereafter referred to as the Quonset Hut) is located approximately 3.5 miles north of the City of Kenai along Wildwood Drive. The site is a Formerly Used Defense Site (FUDS), property # F10AK025104, Former Wildwood Air Force Station. While the United States Army Corps of Engineers (USACE) is the responsible party (RP) for the site, work was conducted by the Kenaitze Indian Tribe under a Native American Lands Environmental Mitigation Program (NALEMP) Cooperative Agreement.

#### **Site Description and Characterization**

The Quonset Hut site is located east of the Wildwood Correctional Center and approximately 500 ft. north of the ACS MARS facility. At the time of the remedial investigation (RI) conducted in 1990 the site consisted of a burned-out Quonset Hut with a chain-link fence around the perimeter. Metal debris, including furniture and electrical equipment, was located inside the remains of the Quonset Hut. In addition, an Aboveground Storage Tank (AST) was formerly located along the south side that used to supply fuel to the Quonset Hut. Stained soil was identified at the AST location, as well as at the southwest corner of the building. Surface soil, subsurface soil, and groundwater at the source area were investigated during the RI. Diesel Range Organics (DRO) were detected in the POL-stained surface soil (up to 15,000 milligrams per kilogram (mg/kg)), and the groundwater (up to 9.98 milligrams per liter (mg/L)) beneath the stained soil, both above the ADEC cleanup levels.

Based upon contamination identified during the RI, removal actions were conducted in 1996. The Quonset Hut structure, ash, metal debris, and the chain-link fence were removed. Approximately 37 cubic yards of POL-contaminated soil was removed from two locations at the Quonset Hut source area. Stained soil was removed from the upper one foot near the southwest corner of the Quonset Hut and excavated to nine feet bgs at the former AST location. However, contaminated soil remained below the groundwater table at the AST location. POL-contaminated groundwater was identified extending approximately 50 feet downgradient from the former AST location.

In 2005, a Rapid Optical Screening Tool/Laser-Induced Fluorescence (ROST/LIF) investigation delineated the lateral and vertical extent of the remaining soil POL contamination. POL contamination was identified below the former AST location and extended laterally more than 20 feet and less than 35 feet downgradient. Contamination near the former AST location existed in a depth interval extending from 5 to 10 feet below ground surface (bgs). Soil samples collected from locations with the highest LIF responses contained DRO ranging from 1,390 mg/kg to 2,150 mg/kg (USACE, 2007).

In 2009, USACE conducted groundwater monitoring at 4 temporary well points and analyzed the samples for Gasoline Range Organics (GRO) and DRO. In the 1995 RI, DRO was reported above cleanup level at the former AST location (AP-497; 9,980 µg/L). The DRO concentration in groundwater has decreased significantly and is now detected well below cleanup levels in all well points. DRO was detected in all four wells (25-65 µg/L) well below the ADEC cleanup level (1,500 µg/L). GRO was not detected in any well.

### **Cleanup Levels**

DRO has been identified as the primary Contaminant of Concern for this site. Applicable soil cleanup levels are the 18 AAC 75.341 Method Two, Table B2, Migration to Ground water for the Under 40 inch Zone (250 mg/kg). The applicable ground water cleanup level is the 18 AAC 75.345 Table C cleanup level for DRO (1500 µg/L).

### **Cleanup Activities**

Contaminated soil at the Quonset Hut site was excavated on July 9-10, 2013, June 30, 2014, and July 13, 2014. The excavation of contaminated soil was guided by field screening using a Photo-ionization Detector. Soil contamination was identified in surface soil to a depth of 8 feet bgs. At the completion of each stage of the excavation, confirmation soil samples were collected for laboratory analysis. If laboratory results were above the ADEC Method 2 soil cleanup levels additional excavation was conducted to achieve clean samples. At the completion of the third phase of excavation the contractor had met the 18 AAC 75 ADEC cleanup levels for this site.

A total of 228 cubic yards of contaminated soil was removed from the excavation and stockpiled on site. Following the receipt of soil characterization sampling it was determined that soil would be thermally treated at Soil Processing Incorporated (SPI) in Nikiski, AK. Once transport was approved by ADEC the contaminated soil was loaded into 20-yard dump trucks and transported to SPI. Thermal Treatment was complete by September 23, 2014.

### **Closure Determination**

Based on a review of the site history and remaining contaminants ADEC has determined that the Migration to groundwater cleanup levels have been achieved following soil excavation and ground water has attenuated to meet the Table C cleanup level. Therefore, the Department has determined that a Cleanup Complete status is appropriate for "Wildwood AFS ACS MARS Facility Quonset Hut" site. Therefore, this

site will receive a "Cleanup Complete" 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 75.325(i). 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.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

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 contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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, P.O. Box 111800, Juneau, Alaska 99811-1800, 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.

ADEC greatly appreciates the efforts of the Kenaitze Indian Tribe to address environmental contaminants remaining from former DoD use of tribal property. We would like to encourage you to continue working with USACE and the NALEMP program to continue these efforts.

Please feel free to contact me at (907) 269-7528 or by e-mail at [guy.warren1@alaska.gov](mailto:guy.warren1@alaska.gov) if you have any questions, comments, or require additional information.

Sincerely,



Guy Warren  
Environmental Program Specialist

CC: Valerie Palmer, USACE via E-mail