



DEPARTMENT OF THE ARMY
ALASKA DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 6898
JBER, AK 99506-0898

March 27, 2018

CEPOA-PM-ESP

MEMORANDUM FOR RECORD

SUBJECT: Long Island/Fort Tidball Formerly Used Defense Sites (FUDS) F10AK0280-02/03 Decision Document

1. The Decision Document (DD) for Long Island/Fort Tidball Formerly Used Defense Sites (FUDS) F10AK0280-02/03 was signed on 8 September 2005. The Alaska Department of Environmental Conservation (ADEC), the State Regulator, concurred, in writing, on 13 September 2005. The purpose of this MFR is to document the rationale for conducting five-year reviews at this project and for documenting the U.S. Army Corps of Engineers, Alaska District's (USACE) and ADEC's determination that changes to the remedy defined in the DD are necessary and appropriate.
2. The selected remedy in the 2005 DD was:
 - a. Apply ADEC Method Three alternative cleanup levels (ACLs) for petroleum hydrocarbons using site-specific soil data.
 - b. Apply informational institutional controls to all sites where Method Three ACLs are applied.
 - c. Apply No Further Remedial Action Planned (NFRAP) and No Defense Action Indicated (NDAI) status. NFRAP status and NDAI determination indicate that no further investigation, monitoring, cleanup work, or site improvements are necessary to address chemical contamination from past Department of Defense (DoD) activities at the site.
3. Although not part of the remedy, the DD, in section 12.6, states that: "Because the remedy will not result in hazardous substances, pollutants, or contaminants remaining onsite above levels that allow for unlimited use and unrestricted exposure, five-year reviews will not be required to ensure the remedy is protective of human health and the environment." However, the DD also notes that soil containing PCBs below 10 mg/kg were used as backfill in the headquarters area.
4. In 2016, ADEC questioned the protectiveness of the remedy and requested further investigation. Upon review of the administrative record and DD, USACE and ADEC have determined:
 - a. Informational institutional controls are not necessary under current regulatory requirements for the areas where petroleum ACL were applied;

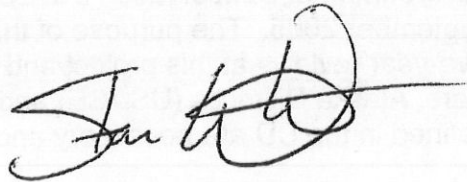
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b. Institutional controls, in the form of a deed notice limiting soil excavation/digging, are necessary at the former Headquarters Area – H (HQ-H) since the levels are above the level suitable for unrestricted use and unlimited exposure (UU/UE).

c. USACE intends to conduct five-year reviews on the former HQ-H site, because the area is not suitable for UU/UE.

5. Point of Contact is the undersigned.



Stan Wharry, Branch Chief
POA Environmental and Special Programs
(907) 753-5781



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: 2610.38.001

April 5, 2018

US Army Engineer District, Alaska
Attn: CEPOA-PM-C (Acting) (FUDS) (Geist)
PO Box 6898
Elmendorf AFB, Alaska 99506-6898

Re: Long Island – Fort Tidball FUDS, Kodiak
Hazard ID: 55

Dear Lisa Geist:

In September 2005, the Department of Environmental Conservation (department) and the Alaska District, U.S. Army Corps of Engineers jointly signed a Decision Document, dated August 2005, describing the selected remedy for contaminated sites that resulted from past Department of Defense (DoD) activities at the Formerly Used Defense Site (FUDS) identified above.

Recent review of remedy indicated that a portion of the remedy had not been implemented. Informational institutional controls had not been established on areas of the property where alternative petroleum cleanup levels had been applied.

Additionally, an area at the former Headquarters Area where polychlorinated biphenyls (PCB) contaminated soil had been cleaned up is not suitable for unrestricted use and unlimited exposure (UU/UE). The Decision Document did not call for, and remedy did not include, institutional controls on that area or for Five-Year Reviews on the remedy protectiveness.

Through discussion with the Alaska District and the current landowner (Leisnoi Incorporated), mutual agreement was reached that the remedy defined in the Decision Document should be modified.

This letter documents the department's concurrence with the revised remedy as described in the attached Memorandum for Record – Long Island/Fort Tidball FUDS Decision Document, dated March 27, 2018. This determination is in accordance with 18 AAC 75.380 and does not preclude the department from requesting the Corps of Engineers conduct additional assessment and/or cleanup action if new information becomes available that indicates contaminants from past DoD activities at the Fort Tidball FUDS may pose an unacceptable risk to human health or the environment.

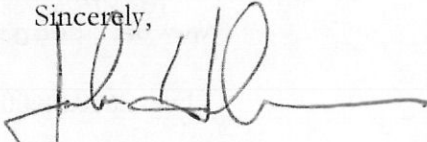
Lisa Geist
US Army Engineer District, Alaska

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April 5, 2018

If you have questions about this letter, please feel free to contact me at (907) 269-7545 or john.halverson@alaska.gov.

Sincerely,



John Halverson
Program Manager
ADEC Contaminated Sites Program

Attachment: Memorandum for Record – Long Island (USACE, March 27, 2018)

cc: Jana Turvey, Leisnoi Incorporated (via email)