



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of
Environmental Conservation
DIVISION of SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File: 100.38.218

9 April 2019

Civil Air Patrol
ATTN: Carl L. Brown, Jr.
Alaska Wing Civil Air Patrol
PO Box 6014
Elmendorf AFB, AK 9950

**RE: Request for Release Investigation – 3855 University Avenue, Fairbanks, Alaska
FIA – Civil Air Patrol HOT (Heating Oil Tank), Hazard ID No. 4449**

Dear Mr. Brown:

The Alaska Department of Environmental Conservation (DEC) has reached out to you over the past 15 months regarding the requirement for further characterization at the referenced location of your operations at the Fairbanks International Airport. The project is known as 'FIA – Civil Air Patrol HOT' and has DEC hazard ID No. 4449, and file no. 100.38.218. You had indicated that the Civil Air Patrol was seeking a Real Property Officer, and that they would be the point of contact to manage any outstanding requirements. Since it has been more than a year since I first re-engaged the Civil Air Patrol with no response to the issue at hand, it is appropriate that I begin formal documentation of outstanding compliance requirements.

According to our records, a site assessment was completed after a 1,000-gallon buried heating oil tank was removed on May 11, 2007. Contaminated soil was removed and samples collected from beneath the location of the tank confirmed that soil was contaminated at a minimum of 14,100 mg/kg as diesel range organics (DRO). Based on the location and concentration of the soil samples, it was presumed that groundwater was impacted; however, no groundwater samples were collected.

In terms of managing contamination, it is a requirement for any site that the extent of contamination be delineated adequately before any determination regarding cleanup can be made. Postponement of aggressive cleanup and allowing 'natural attenuation' to be the chosen remedy is possible with petroleum spills, but it must first be shown that the extent of impact is relegated to one's own property, does not pose a risk, and that any plume, if present, is stable and/or decreasing in size – this often requires a period of episodic monitoring. With an

understanding of the extent of impact, monitoring may be appropriate to confirm assumptions, allowing chemical or biological processes to effectively remediate a site.

In general, the heating oil tank was removed and the soil management associated with that removal is completed. To bullet the general requirements remaining:

- Determine the lateral extent of contamination (Recommendation in Rockwell report, p. 4).
- Determine the extent of groundwater contamination, if present (DEC Letter 8 Oct 2007).
- Determine the risk to receptors, including drinking water and vapor intrusion, as applicable. (DEC Letter 8 Oct 2007)
- Develop a corrective action plan or strategy for the site, which, if appropriate, may rely primarily on natural attenuation.

I re-attached the initial DEC response to the Rockwell report from 2007 of which the requirements remain largely unchanged. I did learn that there was another tank removal project at this same facility that involved the removal of regulated underground storage tanks (USTs) by NORTECH in 1994, and was further addressed under Rockwell oversight in 1999. I subsequently wrote a closure letter in 1999 for those specific regulated tank removal issues. It may be that some of the outstanding issues associated with the two tank projects were combined or confused, as the oversight for regulated tank and non-regulated heating oil tank issues were actually managed in separate programs within DEC through the 1990's.

I recommend discussing the current status with a qualified environmental professional who may be able to provide specific recommendations and focused on your organizations interests. I will also recommend oversight at DEC by staff that manage multiple sites at FIA to ensure that any actions requested of, or taken by, other parties with environmental obligations at FIA are managed equitably and consistently. Please contact me directly at (907) 451-2166 or through email at, john.carnahan@alaska.gov if you have any questions.

Regards,

John Carnahan
Environmental Program Specialist

Attachments/Enclosures: DEC Comment Letter, 8 October 2007

STATE OF ALASKA

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM**

SARAH PALIN, GOVERNOR

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File: 100.38.218

October 8, 2007

Civil Air Patrol
Attention: Carl Brown
P.O. Box 6014
Elmendorf AFB, AK 99506

Re: ADEC comments – Civil Air Patrol Site Assessment Report
3855 University Avenue
Fairbanks, Alaska

Dear Mr. Brown:

The Alaska Department of Environmental Conservation (ADEC) has reviewed Rockwell Engineering & Construction Services, Inc. *Tank Replacement and Site Assessment Report, Civil Air Patrol, 3855 University Avenue, Fairbanks, Alaska 99709* dated July 23, 2007. According to the report, a site assessment was conducted after a 1,000-gallon underground storage tank (UST) was removed on May 11, 2007. After the tank was removed and some volume of soil was excavated, two samples were collected from the bottom of the excavation, one from under the center of the tank and one, plus a duplicate, from under the fill tube of the UST. The results from the sample collection indicate diesel range organic (DRO) levels as high as 14,100 milligrams per kilogram (mg/kg) under the fill tube.

ADEC has the following comments on the site assessment report:

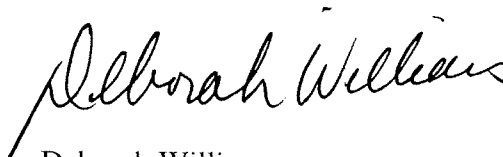
1. What is the volume of contaminated soil that was excavated and proposed to be thermally remediated?
2. As part of determining potential contaminants of concern (COC) at the site, the analysis of polynuclear aromatic hydrocarbons (PAHs) should be included in the next sampling. A sample should be collected from the area of the highest contamination to confirm PAHs are not a COC at the site.
3. Given that groundwater in that area is shallow and the results of the confirmation soil samples were high, groundwater samples should be collected to confirm that groundwater has not been impacted. If groundwater has been impacted, the extent of the contamination should be delineated.

4. Please determine if there are any drinking water wells in the area and, if so, illustrate where they are located in proximity to the contamination.
5. ADEC requires that consultants fill out a laboratory Quality Control checklist for any laboratory data that is submitted. Please ensure that the form is completed for any future laboratory data that is submitted.

The ADEC is required by Alaska Statute 46.03.760, AS 46.03.822 and AS 46.03.070 to recover expenses incurred in providing regulatory oversight for hazardous substance spills. Expenses for which we must seek reimbursement include staff time associated with general or technical assistance, work plan review, project oversight, general project management, legal services, interest, travel, equipment and supplies, in addition to any contracting costs.

If you have any questions or concerns pertaining to these comments, please feel free to contact me via telephone at 451-5174 or via e-mail at Deborah_Williams@alaska.gov.

Sincerely,

A handwritten signature in black ink that reads "Deborah Williams". The signature is written in a cursive style with a large initial 'D'.

Deborah Williams
Environmental Program Specialist

cc: Aaron Hall, Rockwell Engineering & Construction. Inc. (via e-mail)