STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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Mr. Steve Mattson
611 CES 10471 20th St Ste 302
JBER, AK 99506-2200

RE: Port Heiden Radio Relay Station – compliance advisory letter

Dear Mr. Mattson:

ADEC appreciates the Air Force's on-going coordination and cooperation in responding to the apparent failure of the selected remedy for this site. Information gathered over the past several months documents that portions of the remedial action conducted at the Port Heiden Radio Relay Station have not been done in accordance with the February 2009 Record of Decision (ROD) for the site. The ROD specifies, among other requirements, the following:

- Soil containing more than 10 mg/kg PCB will be excavated, washed to reduce the concentration below 10 mg/kg, and disposed of in a local Class III permitted solid waste disposal facility;
- Soil containing more than 1 mg/kg and less than 10 mg/kg PCB will be excavated and disposed of in a local Class III permitted solid waste disposal facility;
- Residue generated during soil washing will be handled and disposed of in accordance with state and federal regulations.

Based on apparent and reported discrepancies between the fieldwork conducted by some of the Air Force contractors during 2009 and the approved remedial action plans, the Air Force contracted with the AECOM and the Native Village of Port Heiden to conduct follow-up sampling in 2010. Data from these sampling events indicates a failure of the remedy and alleged violations of State regulations.

Polluted Soil Disposal in the Landfill

The solid waste disposal permit (permit #: SW3A069-14) issued to the Native Village of Port Heiden for the Class III landfill prohibits disposal of polluted soil in the landfill without specific written permission from ADEC. In a letter dated May 29, 2009 the ADEC Solid Waste Program authorized disposal of soil containing less than 10 mg/kg PCB in the landfill.

AECOM collected eighty (80) discrete soil samples from the PCB disposal cell at the landfill; forty (40) samples were collected near the top of the cell and forty (40) were collected near the bottom. Twenty-one (21) of these samples contained PCBs at concentrations above the 10 mg/kg landfill permit limit. This is an alleged violation of the ROD, approved workplan, the

landfill permit and the Site Cleanup Rules (18 AAC 75.360 – Site Cleanup Operations) and the Solid Waste Disposal regulations (18 AAC 60.025 - Polluted Soil). Polluted soil improperly disposed of in the landfill needs to be removed, treated and/or disposed of properly.

Soil Washing Tanks and Treatment Residues

Steel and poly-tanks used during the soil washing were improperly disposed of off-site and found to contain residual contaminated soil. Subsequent sampling conducted by the Native Village of Port Heiden documented up to 91.5 mg/kg PCB in the soil. This off-site disposal is an alleged violation of the approved workplan, ROD, the Site Cleanup Rules (18 AAC 75.360 – Cleanup Operations Requirements) and the CERCLA off-site rule. In a letter dated October 1st ADEC requested the Air Force fence the area around the tanks and develop a plan to remove and properly dispose of the tanks and contaminated soil in and around them as soon as feasible. In response, the Air Force fenced the area and submitted a Time Critical Removal Action plan on October 21, which ADEC approved on October 22. I understand the plan will be implemented after EPA completes additional investigation at the site in early November. DEC requests advanced notification on the planned mobilization date.

PCB contamination at the Soil Washing Area

Twenty-one (21) soil samples were collected from the soil washing area before and sixteen (16) soil samples were collected after conducting the soil washing operations by DMC Technologies. The results reportedly did not contain PCB above the 1 mg/kg cleanup level. However, the 2010 AECOM report, submitted to DEC by the Air Force, documents the soil washing area has been impacted with PCB-contamination above the cleanup level. AECOM collected three-hundred-twenty-one (321) composite soil samples at the soil washing area (not including quality control samples); one-hundred-thirty-seven (137) samples contained PCB above the cleanup level, with the maximum reported concentration being 27 mg/kg PCB. Additional remedial action is required in the former soil washing area.

Remedy Failure

The issues described above, in particular disposal of soil containing greater than 10 mg/kg PCB in the landfill and the improper disposal of residue from the soil washing operations, are considered a failure to properly implement the remedy selected in the February 2009 ROD.

An Explanation of Significant Differences (ESD), dated May 2010, was signed in June of this year. The ESD changed the PCB contaminated soil remedy to excavation and off-site disposal. The change was necessary due to the significantly higher volume of PCB soil than was anticipated and the fact the local Class III landfill did not have capacity to accept more low level (< 10 mg/kg) PCB soil; approximately 9,200 cubic yards of soil had already been disposed of in the landfill. The ESD did not include any proposed action related to soil already placed in the landfill.

ADEC requests a written response from the Air Force within twenty-one (21) days of receipt of this letter outlining how it plans to address this alleged remedy failure. ADEC also requests the Air Force meet with ADEC and EPA to discuss whether another ESD or a ROD amendment is necessary.

If you have any questions regarding this letter, please call me at (907) 269-7545.

Sincerely,

John Halverson
Environmental Program Manager

cc (via email):
Pat Roth, 611 CES
Louis Howard, DEC
Lori Aldrich, DEC
Jennifer Currie, DOL
Jacques Gusmano, EPA