

STATE OF ALASKA

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

SEAN PARNELL, GOVERNOR

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-0298
FAX: (907) 269-7649
www.dec.state.ak.us

File: 2100.26.272.14
2100.26.272.15

December 29, 2009

Douglas Quist
MWH Americas, Inc.
1835 S. Bragaw Street Suite 350
Anchorage, AK 99508

Re: Your Letter of December 22, 2009, Kulis Air National Guard Base (KANGB)

Dear Mr. Quist:

The Alaska Department of Environmental Conservation has reviewed your request on behalf of KANGB for cleanup complete decisions for the Waste Oil Underground Storage Tank (UST) and Oil/Water Separator 3-3, and for Tank 3-X.

When the 1500 gallon Waste Oil UST and the Oil/Water Separator 3-3 were removed in 1995, diesel range organics were found below the UST up to 423 mg/kg. No other exceedances of the most stringent soil cleanup levels were identified. In 2006 DEC issued a notice of Conditional Closure for this site because the most stringent cleanup level applicable was exceeded. In July 2009 a Memorandum regarding Site Closure was issued by the Contaminated Sites Program Manager clarifying requirements for how the Contaminated Sites will make closure determinations for sites regulated under 18 AAC 78. Per this memorandum, the term conditionally closed will no longer be used and is replaced with either Cleanup Complete or Cleanup Complete with Institutional Controls.

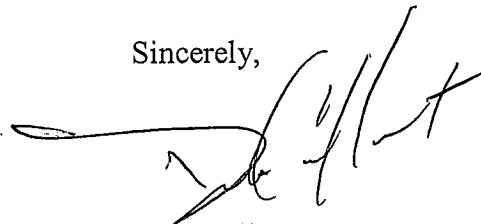
Upon review of information DEC has on file for the UST and Oil/Water Separator 3-3 DEC finds that there is no unacceptable risk to human health or the environment. The level of DRO remaining is below the ingestion and inhalation cleanup levels. While the level exceeds the migration to groundwater pathway, the groundwater has not been impacted and taking into consideration that the groundwater at KANGB is 70 feet or greater below ground surface DEC does not consider the pathway for DRO migration to groundwater to be complete. Therefore DEC is changing the designation for this site from Conditional Closure to Cleanup Complete. This determination that cleanup is complete is subject to a potential future determination that the cleanup is not protective per 18 AAC 78.276(f)(2). If the CSP makes a determination that conditions at a site are no longer protective of human health, safety or welfare, or of the environment, additional actions will be necessary to meet the requirements of the site cleanup rules.

For Tank 3-X, DEC in response to a site characterization report in 2008 stated *The Air National Guard will need to record the location of the UST on its Base Master Plan or equivalent and make arrangements for the disclosure of this site upon land transfer under Base Realignment and Closure. In the future, if this location becomes accessible, additional characterization will be required to determine the extent of contamination remaining.*

DEC required documentation of the recording of these conditions before the site could be issued a Conditional Closure. This determination was issued because the conditions at the site did not allow complete characterization of the contamination remaining. Under the current guidance this site could be designated Cleanup Complete with Institutional Controls (IC) when the documentation of recording the ICs is provided.

Please contact me at 907-269-0298 or Deb.Caillouet@alaska.gov if you have any questions on this determination.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deb Caillouet', with a long horizontal stroke extending to the left.

Deb Caillouet
Environmental Program Specialist

cc: Winston Crow, USAF ANG NGB/A7OR
Darryl Weaver, USAF ANG 176 CES/CEM