STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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June 22, 2010

Naval Facilities Engineering Command, Northwest
Attn: Aaron Vernik, RPM
1101 Tautog Circle, Suite 203
Silverdale, WA 98315

Re: Cleanup Complete with Institutional Controls Determination for SA-82 NSGA P80/P81 Buildings (RecKey# 199425X018147, Hazard ID# 2208)

Dear Mr. Vernik:

The Alaska Department of Environmental Conservation (ADEC) has reviewed documents associated with site SA-82 NSGA P80/P81 Buildings and will issue a "Cleanup Complete with Institutional Controls" determination. ADEC agreed to the request to cease groundwater monitoring in 2008 and recognizes that the requirements for remediation have been completed. Although cleanup criteria were not established for this site (*Final Decision Document for Petroleum Sites with No Unacceptable Risk, 2005*), DRO concentrations remain at 3,200 mg/kg and Institutional Controls will need to be maintained. Therefore, the Department grants "*Cleanup Complete with Institutional Controls*" status for the SA-82 NSGA P80/P81 Building site.

On-Site Sources

SA-82 NSGA P80/P81 Building site held a building used as a community center and three tanks that stored jet petroleum No. 5 (JP-5) fuel. Site characterization activities are summarized in the September 2004 Final "*Site Characterization Report, Free-Product Recovery Petroleum Sites with Risks Below Target Health Goals*". The SA-82 site contained two underground storage tanks (USTs) and one aboveground storage tank (AST) that were removed prior to 1991. Site characterization identified soil and ground water contamination and the presence of free product on the ground water surface. The OUA ROD selected free product recovery as the interim remedy for this site. The site was transferred for oversight under the State Adak Environmental Restoration Agreement (SAERA) in March 2002 through Amendment #1 to the SAERA agreement. The final 2005 "*Decision Document for Petroleum Sites with No Unacceptable Risk*" selected limited ground water monitoring and limited soil removal as the remedy for this site for the following reasons:

- Limited volume of soils exceeding soil criteria,
- Soil is readily accessible, and
- The DRO exceedances were observed in surface or near-surface soil.

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The Decision Document (DD) specified that soil removal will extend to a depth of six feet in a ten foot by ten foot square centered on soil sampling location 182.

Removal Action

The Navy returned to SA-82 to excavate surface soil contamination as specified in the DD between July 7 and 10, 2006. The excavation was centered on former soil sampling location 182. A 12 foot square area was excavated to 6 feet bgs. A bentonite plug was observed in the center of the excavation which indicated that the excavation was accurately centered at former soil sample location 182. Approximately 23 cubic yards of contaminated soil were removed from the excavation, loaded into lined and covered disposal containers, and transported off-island for disposal at Waste Management's Columbia Ridge non-hazardous waste landfill in Arlington, OR. Following excavation one confirmation sample was collected from the center bottom of the excavation area. Laboratory results indicate DRO concentrations of 3,200 mg/Kg remain at the floor of the excavation area. Site restoration included backfilling 23 cubic yards of compacted, clean pitrun material in the excavation pit.

Groundwater Monitoring

Evaluation of potential ground water contamination occurred at the site on an annual basis from 2001 to 2008 and monitored DRO, RRO, GRO, BTEX and Natural Attenuation Parameters. Free product appeared in well 12-180 once in 2006, however has not appeared since and DRO has remained below endpoint criteria for 2 consecutive years. Groundwater elevations fluctuated between 2007 and 2008, but despite this flushing event, no further free product was encountered and DRO remained below endpoint criteria at all wells. Groundwater monitoring was discontinued in 2008 as the site had met endpoint criteria for the limited groundwater monitoring remedy.

Institutional Controls

Institutional controls (IC), established by the Decision Document, are in affect at the SA-82 P80/P81 Building and include:

- Adak Downtown ground water use restriction.
- Land use restrictions that limit use of the site to commercial/industrial and prohibit residential occupancy of the site.
- IC excavation permits are required for proposed excavations at this site.
- Equitable Servitude will ensure that all applicable land use restrictions are included on land titles to ensure that future land owners are aware of the restrictions.

The Institutional controls for the site are inspected annually in accordance with the "*Institutional Control Management Plan*". Annual IC inspections at the site remain a requirement to ensure that IC's remain protective of human health, public safety, and the environment.

Cleanup Complete with Institutional Controls Determination

The Department grants "*Cleanup Complete with Institutional Controls*" status for the SA-82 NSGA P80/P81 Buildings site. The remedy for this site has been implemented in accordance with the Decision Document. Please note that the Department reserves all of its rights under 18 AAC 70, 18 AAC 75, 18 AAC 78, and AS 46 to require the Navy to conduct further investigation and/or remedial action if new information indicates contamination at SA-82 poses a risk to human health, public safety, or the environment.
Please include site monitoring wells in the list of monitoring wells requiring decommissioning as part of the Navy's upcoming monitoring well network evaluation and provide documentation of decommissioning once complete.

Please feel free to contact me or Guy Warren at (907) 269-3056 or (907) 269-7582, respectively, or by email at meghan.dooley@alaska.gov or guy.warren1@alaska.gov if you have any questions, comments, or require additional information.

Sincerely,

Meghan Dooley
Environmental Program Specialist