

STATE OF ALASKA

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

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March 28, 2007

Mr. Scott Berglund
Federal Aviation Administration
222 West 7th Avenue, Building #14
Anchorage, Alaska 99513-7587

Re: FAA Juneau Facility, rekeys 1999110002201 and 1992110111901
Site Closures for Various Tanks, and Conditional Closure for Tank 39-B-1

Dear Mr. Berglund:

The Alaska Department of Environmental Conservation (DEC) has completed a review of the project file for the Federal Aviation Administration (FAA) Juneau Facility in order to determine additional environmental cleanup actions which need to occur at the facility prior to closure by DEC. The site file review was conducted at this time as DEC has recently assigned a new project manager to this site. During the review, it was discovered that seven (7) previously decommissioned fuel storage tanks had not been closed when the *Decommissioning Assessments* were reviewed.

It was also learned that cleanup levels have not been approved for this site. Alaska regulation, 18 Alaska Administrative Code (AAC) 75.340(d), states that "*soil cleanup levels provided under method one and method two apply at a contaminated site unless the department approves an alternative cleanup level that the responsible person has proposed under method three or method four*". Therefore, until such time that the FAA proposes an alternative cleanup level which is reviewed and approved by DEC, the soil cleanup levels appropriate for the site are the method two levels set forth in 18 AAC 75.314, Tables B1 and B2 for the over 40-inches of precipitation climate zone for the most stringent risk based exposure pathway, specifically, diesel-range organics (DRO): 230 milligrams per kilogram (mg/kg), gasoline-range organics (GRO): 260 mg/kg, residual-range organics (RRO): 8300 mg/kg, benzene: 0.02 mg/kg, ethylbenzene: 5 mg/kg, toluene: 4.8 mg/kg, xylenes: 69 mg/kg and lead: 400 mg/kg. If, in the future, FAA wishes to pursue an alternative cleanup level at the FAA Juneau Facility site, DEC staff will be open to that discussion.

There are several areas of concern where contamination is present. The need for additional actions at the Building 300 Shop Tank 39-A-4, Building 602 Drum Storage Area, Sector Field Office (SFO) Emergency Generator Pad, and Flight Service Station (FSS) Satellite Pad will be determined with the approval of the *Final Site Investigation Report*, which should be submitted to DEC in a month or so. DEC staff has contacted the United States Forest Service (USFS) regarding the debris and potential contamination at CT Site B, and we will be discussing this area of concern further with both FAA and the USFS.

Tank Site Closures

Tank 39-A-1: This 1000 gallon underground storage tank was used for heating oil at Building 200, a former office and storage building at the SFO. The tank was removed in April 1992, as documented in the *Decommissioning Assessment Report*, dated 1992. Twenty-five (25) cubic yards of petroleum contaminated soil were removed and sent to Channel Sanitation in Juneau for thermal treatment. Five (5) confirmation samples were collected from the limits of the excavation at depths of 5-6 feet below ground surface (bgs) and analyzed for extractable petroleum hydrocarbons using the State of Washington analytical methods which are comparable with the DRO range as defined by DEC. All analytical results were non-detect; thus, DEC's method two cleanup levels were met. Site closure is approved for this tank site.

Tank 39-A-2: This 300 gallon underground storage tank was used for supplying fuel to an emergency generator at Building 200. The tank was removed in April 1992, as documented in the *Decommissioning Assessment Report*, dated 1992. Six (6) cubic yards of suspected petroleum contaminated soil was removed and sent to Channel Sanitation in Juneau for landfilling as upon sampling it was found that the soil concentrations did not exceed DEC's cleanup levels. Three (3) confirmation samples were collected from the limits of the excavation at depths of 5-6 feet bgs and analyzed for extractable petroleum hydrocarbons using the State of Washington analytical methods which are comparable with the DRO range as defined by DEC. All analytical results were non-detect; thus, DEC's method two cleanup levels were met. Site closure is approved for this tank site.

Tank 39-A-3: This 500 gallon underground storage tank was used for heating oil at Building 302 at the SFO. The tank was removed in June 1997, as documented in the *Decommissioning Assessment Report* dated November 1997. Three (3) cubic yards of petroleum contaminated soil was removed and sent to a disposal facility in Washington State. Three (3) confirmation samples were collected from the limits of the excavation at depths ranging from 5-8.5 feet bgs and analyzed for DRO, GRO, and benzene, toluene, ethylbenzene, and xylenes (BTEX). The highest concentrations detected were DRO: 52 mg/kg, toluene: 0.02 mg/kg, xylenes: 0.02 mg/kg with GRO, benzene and ethylbenzene all non-detect. All analytical results were below DEC's method two cleanup levels. Site closure is approved for this tank site.

Tank 39-E-1: This 1000 gallon regulated underground storage tank was used for providing gasoline to an emergency generator at Building 622 at the Localizer Display Approach (LDA). The tank was removed in May 1997, as documented in the *Decommissioning Assessment Report* dated November 1997. Twenty (20) cubic yards of petroleum contaminated soil was removed and sent to a disposal facility in Washington State. Five (5) confirmation samples were collected from the limits of the excavation at depths ranging from 4-4.5 feet bgs and analyzed for DRO, GRO, BTEX, and lead. The highest concentrations detected were DRO: 29 mg/kg, GRO: 8 mg/kg, benzene: 0.014 mg/kg, ethylbenzene: 0.05 mg/kg, toluene: 0.05 mg/kg, xylenes: 0.1 mg/kg, and lead: 5 mg/kg. All analytical results were below DEC's method two cleanup levels. Site closure is approved for this tank site.

Tank 39-D-1: This 500 gallon regulated underground storage tank was used for storing diesel fuel at the MALSR. The tank was removed in May 1997, as documented in the

Decommissioning Assessment Report, dated November 1997. No petroleum contaminated soil was discovered during the tank removal. Two (2) confirmation samples were collected from the limits of the excavation at 4-5' bgs and one (1) below the fuel lines at 1' bgs which were analyzed for DRO and BTEX. All analytical results were non-detect, thus, DEC's method two cleanup levels were met. Site closure is approved for this tank site.

Tank Conditional Closure

Tank 39-B-1: This 100 gallon regulated underground storage tank was used for storing diesel fuel at Building 4213 at the Remote Transmitter Receiver (RTR). The tank was removed in June 1997, as documented in the *Decommissioning Assessment Report*, dated November 1997. Two (2) cubic yards of petroleum contaminated soil was removed and to a disposal facility in Washington state. The excavation could not be expanded due to the proximity of the building. Three (3) confirmation samples were collected from the limits of the excavation and analyzed for DRO and BTEX. Additional contamination was found to be present in the excavation hole with the highest DRO sample result of 4300 mg/kg. All BTEX results were non-detect. As documented in the *Remedial Investigation*, dated 1998, six (6) soil borings were advanced with three of those turned into monitoring wells. All soil and groundwater sample results were non-detect, with the exception of one diesel-range organics soil sample result of 23 mg/kg. The location of the former UST has been covered with a concrete pad and a new above-ground storage tank placed there.

DEC determines that the contamination at the Tank 39-B-1 location is likely localized in extent with further characterization and removal not possible until the building and concrete pad are removed. As the contamination plume is likely stable, this site can be conditionally closed until the building and concrete pad are removed; at such time the remaining contamination will need to be addressed.

The department has determined that cleanup at these tanks is complete and site closure is approved. At the RTR, conditional closure is approved as soil containing concentration of petroleum exceeding DEC's most stringent cleanup levels is present; the FAA must notify DEC prior to excavating or otherwise disturbing this soil. Please note that if, in the future, additional contamination is found to be present that may pose an unacceptable risk to human health, safety, welfare or the environment, it must be reported to the department and additional cleanup may be required.

If you have any questions about this site, please do not hesitate to contact me at 451-2181, or Anne Marie Palmieri, of my staff, at 766-3184.

Sincerely,



Colin M. Craven
Environmental Program Manager

cc: Anne Marie Palmieri, DEC-Haines