

**DECLARATION OF PROJECT CLOSURE DECISION
And
NO DEPARTMENT OF DEFENSE ACTION INDICATED
For
FORMERLY USED DEFENSE SITE CON/HTRW PROJECT
AMERICAN RIVER AIR BASE (F10AK081401)
SEWARD PENINSULA, ALASKA**

STATEMENT OF BASIS

Authority for the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) for Containerized, Hazardous, Toxic, or Radiological Waste (CON/HTRW) projects is derived from the Defense Environmental Restoration Program, 10 USC 2701-2707. The decision to closeout this CON/HTRW project is based on the results of a CON/HTRW cleanup conducted in 2000 and additional field screening/sampling performed in 2008. The No Department of Defense Action Indicated Report, dated February 2009, summarizes these activities.

SITE DESCRIPTION AND HISTORY

The American River site is located approximately 22 miles northeast of Teller, Alaska, and 58 miles north of Nome, Alaska. The site is primarily flat and dry, vegetated by tundra, and surrounded by a low and swampy area to the south and east. South of the site along the Agiapuk River, vegetation is described as high brush. During the 1940s, the American River site was the location of a planned classified air base at Igloo. The Army never formally acquired the property; however, a survey party established a base camp at the site in 1944. Funds for the proposed airfield project were cut from the military construction program in 1945, and no further work was accomplished. The camp, equipment, and fuel products at the site were abandoned. The site is currently owned by the Department of the Interior (DOI), including a portion under a regional selection (historical place) application by the Bering Straits Native Corporation pursuant to the Alaska Native Claims Settlement Act of 1971.

A historic site (TEL-061) exists in the project area. Prior to the military, the site was occupied twice. The first occupation may have predated western contact, as evidenced by the existence of four house pits, one sod structure, and two cache pits. The house pits reportedly date to the early 1800s. The second occupation occurred after the site was abandoned, as a winter village following the 1918-1919 influenza epidemic. The existing wooden cabin, built during the 1920s by the Lomen Company, was in association with a reindeer farm to the north at Igloo Corral (TEL-062) in Igloo, Alaska.

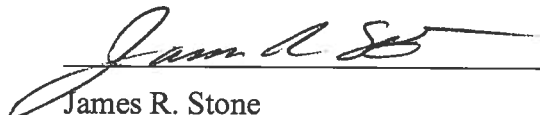
DESCRIPTION OF THE SELECTED REMEDY AND IMPLEMENTATION

During a 2000 Removal Action, 299 55-gallon drums, 2 100-gallon drums, 5 compressed gas cylinders, and 24 Blazo containers were removed from the American River FUDS. The drums were rinsed, crushed, and disposed of in the Nome landfill. Field screening and analytical sample results from a 2008 removal action did not identify any soil with contamination in excess of the 18 Alaska Administrative Code (AAC) 75, Method 2 Arctic Zone direct contact cleanup criteria. Based on the field screening results, sample results, and field team observations no soil was removed from the American River FUDS. All containerized wastes have been removed from the project site, and the remedy is protective of human health and the environment.

DECLARATION

In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Defense Environmental Restoration Program for Formerly Used Defense Sites, the U.S. Army Engineer District, Alaska, has completed all activities required for the selected remedy at the American River FUDS, Seward Peninsula, Alaska.

The accompanying project closeout report supports the conclusion that all known sources of CON/HTRW have been removed and that no further CON/HTRW actions are required at this site. This decision may be reviewed and modified in the future if new information becomes available which indicates the presence of eligible CON/HTRW that may cause a risk to human health or the environment.



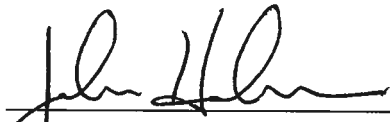
Date 10 MAR 02

James R. Stone

Lieutenant Colonel, Corps of Engineers

District Commander

The State of Alaska, through the Department of Environmental Conservation concurs with this USACE project closure. The decision may be reviewed and modified in the future if new information becomes available that indicates the presence of previously undiscovered containerized waste that may cause unacceptable risk to human health or the environment.



Date 3/27/09

John Halverson

DOD Cleanup Unit Manager

Alaska Department of Environmental Conservation

PM-ESP-EE (Kendall)

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No Department of Defense Action Indicated Report

Containerized Hazardous, Toxic, or Radioactive Waste
(CON/HTRW)

Project # F10AK081401

American River Air Base

Seward Peninsula, Alaska

February 2009



Prepared By:
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1. INTRODUCTION

The Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) authorizes the cleanup of contamination resulting from past military activities at sites no longer owned by the Department of Defense (DOD). A containerized hazardous, toxic, and radioactive waste (CON/HTRW) project was authorized for the American River Air Base in 1992. Environmental investigations and removal activities were conducted at the American River FUDS between 1994 and 2008. The CON/HTRW project at this site is being recommended for closure and No DOD Action Indicated (NDAI) status based on the results of a CON/HTRW cleanup conducted in 2000 and additional field screening/sampling performed in 2008. Cleanup actions at the site included the removal, transportation, and disposal of drums, compressed gas cylinders, and 5 gallon "Blazo" containers.

The U.S. Army Corps of Engineers (USACE) is an agent for the Department of Defense (DOD) and has been assigned the responsibility of coordinating activities at FUDS sites. This project closeout report is issued by the U.S. Army Corps of Engineers Alaska District (Alaska District), the lead agency for the American River FUDS.

2. SUMMARY OF SITE CONDITIONS

2.1 Site Location and History

The American River site is located approximately 22 miles northeast of Teller, Alaska, and 58 miles north of Nome, Alaska, as shown in Figure 1. During the 1940s, the American River site was the location of a planned classified air base at Igloo. The Army never formally acquired the property; however, a survey party established a base camp at the site in 1944. Funds for the proposed airfield project were cut from the military construction program in 1945, and no further work was accomplished. The camp, equipment, and fuel products at the site were abandoned. The site is currently owned by the Department of the Interior (DOI), including a portion under a regional selection (historical place) application by the Bering Straits Native Corporation pursuant to the Alaska Native Claims Settlement Act of 1971.

A historic site (TEL-061) exists in the project area. Prior to the military, the site was occupied twice. The first occupation may have predated western contact, as evidenced by the existence of four house pits, one sod structure, and two cache pits. The house pits reportedly date to the early 1800s. The second occupation occurred after the site was abandoned, as a winter village following the 1918-1919 influenza epidemic. The existing wooden cabin, built during the 1920s by the Lomen Company, was in association with a reindeer farm to the north at Igloo Corral (TEL-062) in Igloo, Alaska.

The site is accessible by helicopter or small river boat in the summer and overland during the winter. The site is primarily flat and dry, vegetated by tundra, and surrounded by a low and swampy area to the south and east. South of the site along the Agiapuk River, vegetation is described as high brush. Figure 2 shows an aerial photograph of the American River site.

2.2 Site Investigation Activities

The USACE conducted a site visit in 1994 to estimate the quantities of metal, wood debris, drums, and compressed gas cylinders at the site. During the 1994 site visit, the USACE did not collect field samples.

A site investigation was conducted during the summer of 1998. A total of 10 primary and one duplicate soil samples were collected and analyzed for gasoline range organics (GRO), diesel range organics (DRO), and residual range organics (RRO), benzene, toluene, ethylbenzene, xylenes (BTEX), polycyclic aromatic hydrocarbons (PAHs), total lead, and lead toxicity characteristic leaching procedure (TCLP). Lead contamination was identified in the one sample taken in the historic house pit at a concentration of 12,000 mg/kg. A soil sample collected from an area beneath the location of a few scattered drums had a DRO concentration of 1,500 mg/kg. The results reported for the remaining samples were either below detection limits or significantly below regulatory levels.

3. REMEDIAL PLANNING ACTIVITIES

Based on the results of analytical sampling and site inventory, an Engineering Evaluation and Cost Analysis (EE/CA) was prepared in January 1999. The preferred alternative identified in the EE/CA was off-site transportation and disposal of the containerized waste and lead contaminated soil. Following approval of the EE/CA, cleanup action planning and design activities were implemented.

The objective of the DERP-FUDS Program is to reduce, in a timely, cost-effective manner, the risk to human health and safety and the environment resulting from past DOD activities. The Remedial Action Objective (RAO) established for this CONHTRW project was to protect human health and the environment by removal of containerized waste and the associated contaminated soil.

4. CLEANUP ACTIVITIES

4.1 2000 Removal Action

In 2000, Bristol Environmental and Engineering Services Corporation (Bristol) performed a removal action at the American River FUDS. Bristol removed 299 55-gallon drums and 2 100-gallon drums from two distinct drum piles. All drums containing fluid were assessed using HazCat screening methods. One drum, containing less than 1 inch of product, tested positive for chlorinated hydrocarbons, was overpacked, and left onsite. The remaining drums were rinsed, crushed, and disposed of in the Nome landfill. The drum removal locations were screened with a photoionization detector (PID) and a PetroFLAG test kit. Four soil samples and one duplicate sample were collected from stained soil found under the large drum pile. DRO was detected in four locations with concentrations above the 18 Alaska Administrative Code (AAC) 75, Method 2 Arctic

Zone direct contact criteria (12,500 mg/kg) in three of the four sample locations, with concentrations ranging from 16,800 to 70,500 mg/kg.

In addition to the drum removal, 5 compressed gas cylinders and 24 Blazo containers were removed from the site and disposed of in the Nome landfill. No soil was removed from the American River FUDS during the 2000 removal action.

4.2 2008 Remedial Action

In 2008, USACE tasked Bethel Services Incorporated – Oasis Environmental Joint Venture (BSI-Oasis JV) with the removal of 6 tons of lead contaminated soil from the historic house pit, removal of 8 tons of petroleum contaminated soil from the location of the large drum pile, removal of one overpacked 55-gallon drum containing chlorinated liquid, and field screening/confirmation sampling at the removal locations.

BSI-Oasis field screened the soil within the historic house pit with a Niton X-ray Fluorescence Analyzer to identify the extent of lead contaminated soil. Field screening results ranged from non detect to 305 mg/kg. Two primary and one duplicate confirmation samples were collected from the locations with the highest field screening results. The samples were analyzed for total lead. Sample results ranged in concentration from 71 to 329 mg/kg. All field screening and analytical results were below the Alaska Department of Environmental Conservation (ADEC) 400 mg/kg cleanup level. Based on the field screening and analytical results no soil was removed from the historic house pit.

BSI-Oasis collected 19 PetroFLAG field screening samples in the vicinity of the former large drum pile. None of the PetroFLAG field screening results exceeded the established field screening criteria of 250 mg/kg. One multi-incremental (MI) confirmation sample, one duplicate sample, and one triplicate sample were collected from the former drum pile area and analyzed for volatile organic compounds (VOCs), GRO, DRO and RRO. The MI sample was comprised of 30 subsample points. The only analytes detected in the three confirmation samples were DRO, RRO, and 1,3,5 trimethylbenzene. All sample results were below the ADEC Method 2 Arctic Zone criteria. The 95% upper confidence level (UCL) on the mean was calculated for DRO (30.42 mg/kg) and RRO (538.53 mg/kg) using the MI sample results. The field team noted that the locations of the former drum piles have revegetated (heavily in some areas) with no visual indication of contaminated soil. Based on the field screening results, MI sample results, and field team observations no soil was removed from the former drum pile locations.

An initial search for the overpacked 55-gallon drum containing chlorinated liquid conducted by air during mobilization to the American River site did not locate the drum. BSI-OASIS personnel attempted to locate the over-packed drum while on-site, beginning at the camp and covering an area approximately $\frac{3}{4}$ mile west and southwest of the camp. The drum was not located. Information received from a Teller resident familiar with the site indicated the drum was located near the wooden building on-site. However, the drum was no longer located near the building or in the former drum pile area and is assumed to

have been removed by someone using the site as a hunting camp. Two empty 55-gallon drums were recovered from a bank south of the wooden building, and one empty 55-gallon drum was recovered from a slough located southwest of the building. The empty, open-top drums were temporarily staged in the camp area and removed from the site during demobilization. They were crushed in Teller with a forklift and disposed of at the Teller Landfill.

4.3 Demonstration of QA/QC from Cleanup Activities

Performance standards for this project were defined in the project solicitation documents. Solicitation documents included a scope of work that defined specific tasks and activities that the contractor was required to accomplish in conformance with applicable regulations, contract clauses, and technical specifications.

All project plans and submittals were reviewed by USACE for compliance with contract technical requirements. Contractor field work was observed by a government quality assurance representative.

5. SUMMARY OF REMEDY

During a 2000 Removal Action, 299 55-gallon drums, 2 100-gallon drums, 5 compressed gas cylinders, and 24 Blazo containers were removed from the American River FUDS. The drums were rinsed, crushed, and disposed of in the Nome landfill. Field screening and analytical sample results from a 2008 removal action did not identify any soil with contamination in excess of the 18 Alaska Administrative Code (AAC) 75, Method 2 Arctic Zone direct contact cleanup criteria. Based on the field screening results, sample results, and field team observations no soil was removed from the American River FUDS. All containerized wastes have been removed from the project site, and the remedy is protective of human health and the environment.

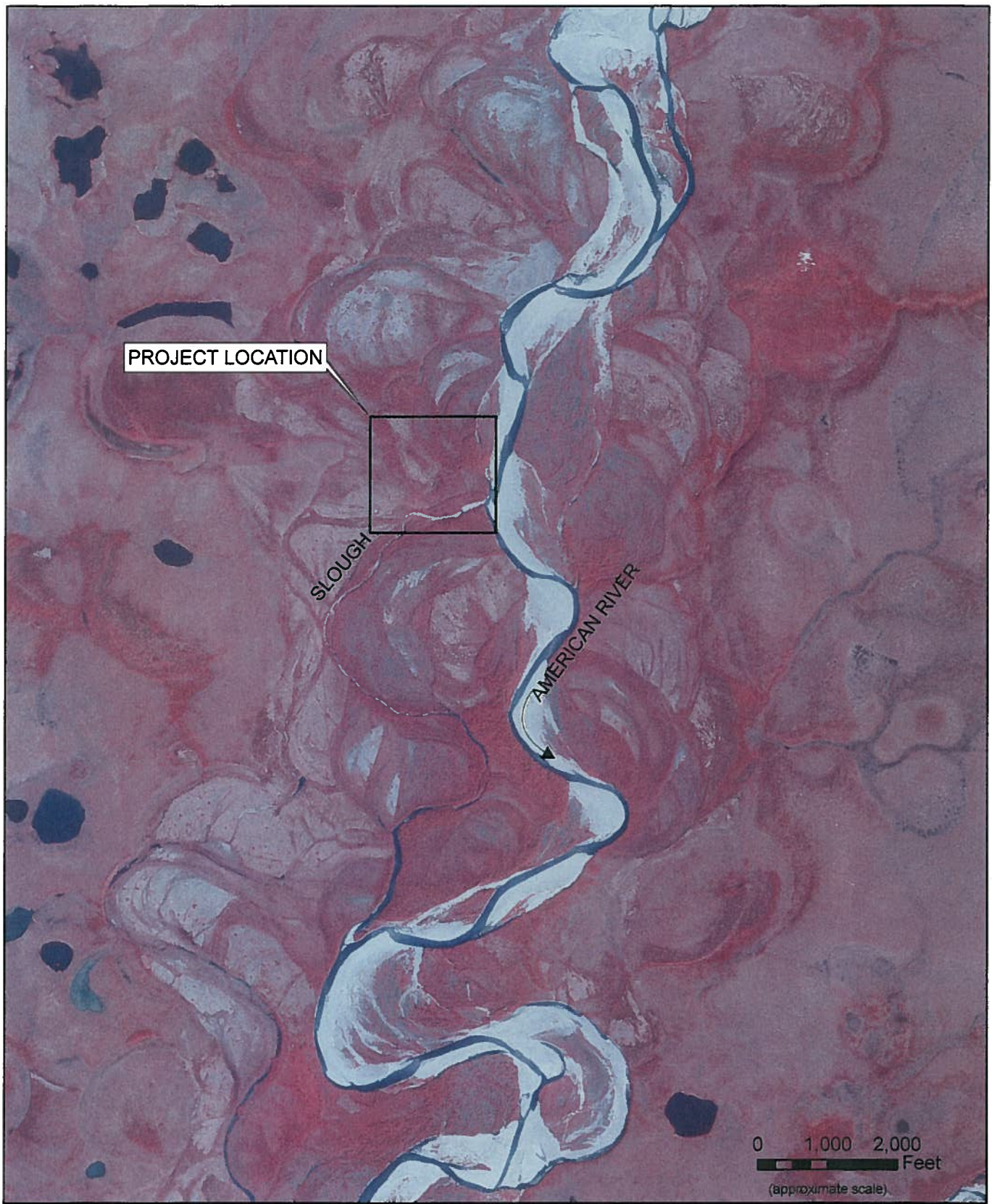
6. COMMUNITY RELATIONS ACTIVITIES

A Public Notice was issued on February 3, 1999 announcing that the U.S. Army Corps of Engineers Alaska District, proposed to remove the drums, compressed gas cylinders, and Blazo containers at the American River FUDS. Interested parties were invited to comment on the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI), including methods of cleanup discussed in the EA. A public comment period was provided from February 3, 1999 to March 3, 1999. There is no record of public comment.

A Public Notice, including the EA and the FONSI, was issued on June 3, 2008 announcing that the U.S. Army Corps of Engineers Alaska District, proposed to clean up remaining CON/HTRW and contaminated soil at the American River FUDS. Interested parties were invited to comment on the EA and FONSI. Additionally, state and federal agencies with regulatory responsibilities pertaining to the proposed project were requested to submit stipulations typical of their permits. A public comment period was provided from June 3, 2008 to July 3, 2008. No public comments were received.

7. REFERENCES

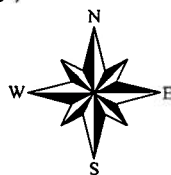
- Bethel Services Incorporated – Oasis Environmental Joint Venture (BSI-Oasis JV), 2008. American River and Davidson's Landing Formerly Used Defense Sites Work Plan. Seward Peninsula, Alaska. June.
- BSI-Oasis JV, 2008. American River Final Remedial Action Report, Seward Peninsula, Alaska. September.
- Bristol Environmental and Engineering Services Corporation, 2001. Final Removal Action Report, Removal of Drums and Other Potentially Hazardous Containers, American River, Seward Peninsula, Alaska. September.
- DOWL/Ogden Joint Venture (JV), 1999. Final Site Investigation Report, American River, Seward Peninsula, Alaska. January.
- United States Army Corps of Engineers (USACE), 1999. Environmental Assessment/Findings of No Significant Impact, CON/HTRW Removal, American River FUDS, Seward Peninsula, Alaska. March.
- USACE, 2008. Environmental Assessment/Findings of No Significant Impact, CON/HTRW Removal, American River FUDS, Seward Peninsula, Alaska. July.



(Source: Aerial Photograph 1984, CIR8226_8-1-85.tif, Aero-Metric Anchorage)

Figure 2 Location Map

American River Project
FUDS Project Number F10AK081401
Seward Peninsula, Alaska



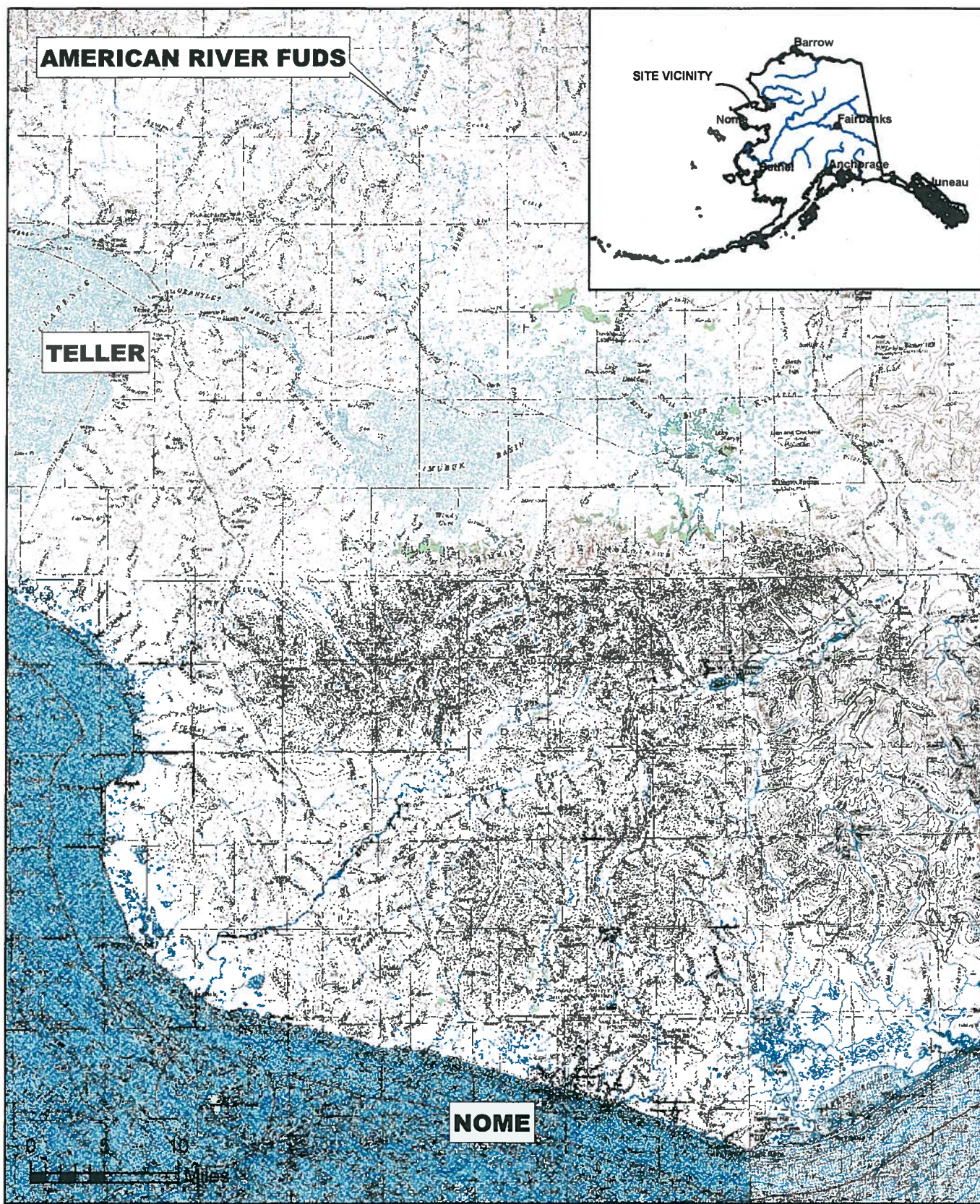


Figure 1 Vicinity Map

American River Project
 FUDS Project Number F10AK081401
 Seward Peninsula, Alaska

