

DECLARATION OF PROJECT CLOSURE DECISION
for
FORMERLY USED DEFENSE SITE HTRW PROJECT
KOGRU RIVER DEW LINE SITE
WEST LANDFILL CELL 4
NORTH SLOPE BOROUGH, ALASKA
(F10AK002204)

STATEMENT OF BASIS

Authority for the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) for Hazardous, Toxic, or Radiological Waste (HTRW) projects is derived from the Defense Environmental Restoration Program, 10 USC 2701-2707. The decision to close out this HTRW project is based on the removal action performed in 2009 and concurrence by the Alaska Department of Environmental Conservation (ADEC). An Action Memorandum detailing the chosen alternative was published in December of 2008.

SITE DESCRIPTION AND HISTORY

The Kogru DEW Line Station was operational from 1954 through 1958. The first site investigation conducted under the Defense Environmental Restoration Program was performed in 1989 by DOWL Engineers. Several removal actions have taken place since that time that did not involve the West Landfill. This Declaration pertains only to Cell 4 of the West Landfill, which is DERP-FUDS project F10AK002204.

Geophysical surveys of the West Landfill, using electromagnetic induction, magnetic fields, and capacity coupled resistivity were conducted by the U.S. Geological Survey (USGS) and the Bureau of Land Management (BLM) in 2005. These show that the landfill is not uniform and identified four areas of concentrated solid waste labeled as Cells 1, 2, 3, and 4. Cell 4 was the closest landfill cell to the ocean inlet known as Kogru River. The West Landfill encompassed an area of 30,000 square feet. Environmental analysis sampling was conducted in conjunction with several site visits; the most recent sampling events that occurred prior to the removal action, in 2003 and 2007, identified elevated concentrations of heavy metals and petroleum hydrocarbons along the toe of the West Landfill bordered by Kogru River. During both sampling events, erosion of landfill debris was noted and hydrocarbon sheen was present near the eroding Cell 4 bluff.

The West Landfill was bordered to the south by Kogru River. The 10-foot high bluff is affected by southeasterly storms and was eroding northward into Cell 4. Waste was scattered along 70 feet of the bluff's toe and was eroding into the inlet. This waste disposal area was created by the military during facility operations. The cover was uneven or non-existent, and consisted of locally obtained fill materials and/or gravel. The disposal area was composed of several sections, which are indistinguishable from the ground surface. The area is marked with small mounds and depressions and consists of generally uneven terrain. Several thaw lakes are located north of the site.

Erosion at the West Landfill has been a documented BLM concern since 1988. Erosion of the southern bluff is caused by wind and wave activity resulting from storm patterns

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driven from the southeast. Other southeast-facing bluffs along the Kogru River area display similar shoreline erosion. Erosion rates were documented at 4.5 feet per year, and are expected to continue at a similar rate following a 5,000-year trend of retreating shorelines in the Beaufort Sea.

The action chosen for the site was specified in the "Final Action Memorandum, Kogru West Landfill, Cell 4 Removal Action", published and approved in December of 2008. The alternative chosen, disposal based upon waste characterization, involved excavating the landfill and segregating the waste for offsite disposal at appropriate facilities permitted to accept it.

DESCRIPTION OF THE SELECTED REMEDY AND IMPLEMENTATION

The selected remedy for Cell 4 of the West Landfill was that CERCLA hazardous substances and petroleum, oils and lubricants (POL) and associated contaminated soil would be excavated, segregated and disposed of at appropriate permitted facilities according to field screening results and waste characterization samples. This alternative was deemed to provide the most flexibility to accommodate the unknown extent and degree of CERCLA hazardous substances and POL in the West Landfill Cell 4. This alternative also was believed to provide the least risk for cost growth.

The Kogru Interim Removal Action (IRA) was performed between 25 February and 21 April 2009 and during a brief site visit during the summer of 2009. Contaminated soil and debris contained within and emanating from Cell 4 was removed. The Kogru IRA excavated, segregated, and containerized contaminated soil and debris to prevent the continued release of contaminated material and potential hazardous Cell 4 waste into Kogru River, as specified in the Action Memorandum.

Excavation activities encompassed an area of approximately 12,400 square feet. A total of 400 cubic yards (cy) of POL/PCB contaminated soil and metal debris, 25 cy of RCRA hazardous lead contaminated soil, and 3 drums of solid waste were removed from Cell 4. Confirmation sampling was performed that verified cleanup. These efforts were documented in an Interim Removal Action Report prepared by Jacobs Engineering Group in December 2009.

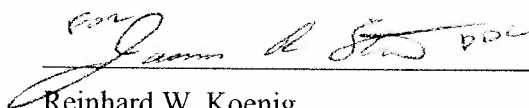
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DECLARATION

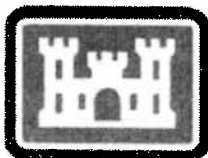
In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Defense Environmental Restoration Program for Formerly Used Defense Sites, the U.S. Army Engineer District, Alaska, has completed all field activities required by the Action Memorandum for the Kogru West Landfill Cell #4 Removal Action at the Kogru DEW Line Station, North Slope Borough, Alaska.

The accompanying project closeout report supports the conclusion that all known HTRW has been removed and that no further DOD HTRW actions are required at Cell 4 of the Kogru West Landfill. This decision may be reviewed and modified in the future if information becomes available which indicates the presence of eligible HTRW that may cause a risk to human health or the environment. This project closure document has been prepared and approved by the undersigned in accordance with FUDS Program Policy, ER 200-34, 10 May 2004 and no further HTRW actions are required at this project.



Date 23 Sep 10

Reinhard W. Koenig
Colonel, Corps of Engineers
District Commander



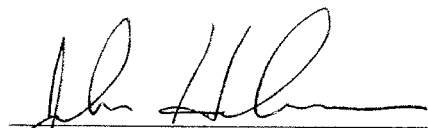
Alaska District

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The State of Alaska, through the Department of Environmental Conservation agrees this Removal Action was performed consistent with state cleanup requirements. The decision may be reviewed and modified in the future if ~~new~~ information becomes available that indicates the presence of previously undiscovered waste that may cause unacceptable risk to human health or the environment.

JH



Date 9/24/10

John Halverson
Department of Defense Cleanup Unit Manager
Alaska Department of Environmental Conservation

