STATE OF ALASKA

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR
610 University Avenue
Fairbanks, AK 99709-3643
PHONE: (907) 451-2180
FAX: (907) 451-5105
www.dec.state.ak.us

File: 860.38.038
860.38.005

June 13, 2012

Al Weilbacher
Building 171
2261 Hughes Ave., Suite 155
Lackland AFB, TX 78236-9853

Re: *ADEC determination "Cleanup Complete" for Site Galena AFS/Airport - UST 1404, Former Galena Forward Operating Location (FOL), Galena, Alaska.*

Dear Mr. Weilbacher:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the Site investigations documented in the Draft Site Inspection Report for the Site Galena AFS/Airport UST 1404, Former Galena Forward Operating Location (FOL), Galena, Alaska. Based on the information provided to date, ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

This decision is based on the administrative record for Galena Airport UST 1404, which is located in the offices of the ADEC in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of the site and provides a summary of the regulatory issues considered in the Cleanup Complete Determination.

Introduction
Site Name and Location:
Galena Airport UST 1404
Galena Alaska, 99741

Database File Number and Hazard ID:
File: 860.38.049
Hazard ID: 25851

Regulatory Authority:
18 AAC 75 and 18 AAC 78.

Background and Characterization Activities

Tank UST 1404 was installed in 1988 and is regulated by ADEC in accordance with 18 Alaska Administrative Code 78. The tank was removed from the ground in 1992 to accommodate a new building addition and a release investigation was not conducted at the time of the tank removal. The site is not listed in the LUST program; however, a release investigation was undertaken to achieve a cleanup complete site closure.

A reconnaissance-level site visit and ecological site survey were completed in October 2009 as part of the Preliminary Assessment of the Former Galena Forward Operating Location (CH2M HILL, September 2011). The surface of the site was observed to be pavement and gravel. No surface staining was observed, and no viable ecological habitat was observed at Site UST1404 during the visit.

In 2010 a site investigation was conducted under a ADEC approved workplan and in compliance with 18 AAC 78 and 18 AAC 75. Soil samples were collected from borings advanced on the north and south side of the former UST location to evaluate the presence or absence of contamination in shallow subsurface soil. Soil samples were collected from 9 to 10 feet below ground surface (bgs) and from 17.5 to 18.5 feet bgs at each boring location. Target analytes at Site UST1404 were identified in the workplan as gasoline-range organics (GRO); diesel-range organics (DRO); benzene, toluene, ethylbenzene, and xylenes (BTEX); and polynuclear aromatic hydrocarbons (PAHs). Soil samples were also screened for trichloroethene (TCE) and tetrachloroethene (PCE). No target analytes were detected in soil above the method 2, table B cleanup levels.

Following the soil sampling, a geophysical survey was conducted in September 2010 to identify the presence of subsurface pipelines associated with former UST 1404-2; no subsurface pipelines were found.

As specified in the ecoscoping form for Site UST1404, the site is covered with pavement and gravel, which does not provide viable habitat. Therefore, terrestrial ecological exposure pathways from soil are incomplete, and data were compared with non-ecological SI soil screening levels (SLs) to evaluate for the presence or absence of contamination in soil. Because the site is located more than 1,000 feet from the Yukon River, there is no potentially complete aquatic ecological pathway. Consequently, no ecological receptors were identified, and the site was not further evaluated for aquatic ecological risk.

A cumulative risk evaluation was completed for the site by comparing the maximum concentrations of detected analytes to one-tenth of the ADEC Table B-1 value for direct contact in the Under 40 inch zone. No analytes detected were above the one-tenth criteria; therefore, there is no unacceptable cumulative risk for Site UST1404 soil.

Contaminants of Concern
During the investigations for this site, diesel range organics (DRO), residual range organics (RRO), and semi-volatile organic compounds (SVOCs), 1-Methylnaphthalene and 2-Methylnaphthalene, as well as the volatile organic compound (VOC), Naphthalene were detected at levels below screening and method 2 clean up levels.

Clean Up Levels
The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
DRO	250
RRO	11,000
1-Methylnaphthalene	6.2
2-Methylnaphthalene	6.1
Naphthalene	20

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

Contaminant	Site Cleanup Level (mg/L)
DRO	1.5
RRO	1.1
1-Methylnaphthalene	0.15
2-Methylnaphthalene	0.15
Naphthalene	0.73

Pathway Evaluation
Following investigation at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Table 1

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	No contamination of surface soils was indicated during investigations. There is no surface soil contact.
Sub-Surface Soil Contact	De-Minimis exposure	Contamination remains in the subsurface, but is below migration to groundwater levels.
Inhalation – Outdoor Air	De-Minimis	Contamination remains in the subsurface, but is below migration to groundwater

	exposure	levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings at the site and any remaining contamination is below migration to groundwater levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater contamination above ADEC cleanup levels was not encountered during the investigations.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	There is no surface or subsurface contamination remaining above migration to groundwater levels.
Exposure to Ecological Receptors	Pathway Incomplete	Contaminated soil is not present at surface.

ADEC Decision

The investigations to date have adequately characterized contaminated soil at the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. The Release Investigation is complete for this site, any potential risk to human health or the environment is acceptable as it is determined to be below action levels, and any contamination remaining has been evaluated as de-minimus. Based on these findings the site status will be designated -"cleanup complete" and the site will be listed as closed on the Department's database.

Although a cleanup complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75.375 (i). It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with 18 AAC 78.276(f), the site cleanup rules in 18 AAC 75.325 Article 3 and site closure rules in 18 AAC 75.380 (d). The determination does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final

decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have any questions concerning this closure decision, please do not hesitate to contact the ADEC project manager at (907) 451-2180, or by email at dennis.shepard@alaska.gov.

Approved By,

Fred Vreeman
Environmental Program Manager

Recommended By,

Dennis Shepard
Environmental Program Specialist

cc: Donna Kozak, Booz Allen Hamilton, via email
Win Westervelt, CH2MHill, via email
Andi Lord, CH2MHill, via email
Colette Foster, ADOT&PF, via email
Sam Myers, ADOT&PF, via email