THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File No: 400.38.004

May 5, 2014

Charley Peyton
AFCEC/OLAR
10471 20th St. Suite 348
JBER, AK 99506-2201

Re: Draft Final Clean Sweep Antenna Demolition, Debris Removal and Environmental Remediation at SS003, Anvil Mountain RRS, Cleanup Complete Determination

Dear Mr. Peyton;

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the referenced site. This decision letter memorializes the site history, cleanup actions, and specific conditions required to effectively manage remaining contamination. No further remedial action will be required as long as compliance with these conditions is maintained.

Site Name and Location:
Anvil Mt. White Alice Site
64° 33' 48.35" N, 165° 22' 15.28 W

DEC Site Identifiers:
File No: 140.38.004
Hazard ID: 844

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background and Characterization/Cleanup Actions

Anvil Mountain RRS consists of an Upper Camp area. The Upper Camp Area contained all of the installation's facilities which included a composite building, a vehicle maintenance building, an equipment maintenance building, two 70,000 gallon fuel tanks, several aboveground day tanks and associated piping, and four tropospheric antennas. Anvil Mountain RRS was constructed by the United States Air Force (USAF) in 1956 and 1957 as one of the 31 original White Alice Communications sites. Anvil Mountain RRS was operated by the USAF between 1957 and 1979. The site was declared excess in 1981.

A preliminary assessment/site investigation (PA/SI) completed in 1993 concluded that petroleum oil and lubricants (POL), lead, and polychlorinated biphenyls (PCBs) were contaminants of concern. A remedial investigation (RI) completed in 1996 defined known and additional areas of concern that contained PCB and POL concentrations in soil that exceeded ADEC Method Two, Under 40 inch Zone, clean up levels.

Clean Sweep operations in 1998 entailed the demolition of all of the sites facilities with the exception of the 4 tropospheric antennas and a building foundation slab. Approximately 125 cubic yards (cy) of POL contaminated soil was excavated and disposed of offsite during Clean Sweep operations. The maximum remaining DRO was 2500 mg/kg. Approximately 2 cy of PCB contaminated soil was excavated at the Equipment Maintenance Building Floor Drain area in 1998 and disposed of offsite. The excavations were back filled and graded to fit the contours of the landscape. The building foundation slab for the Composite Building was demolished and the area was graded in 2000.

Based on ADEC concerns of elevated PCB and lead concentrations in soil remaining at the site, a detailed Field Investigation Study was conducted in 2004. Results from the study concluded that soil contaminated with unacceptable levels of lead (400 mg/kg) had been remediated during the 1998 Clean Sweep Operations and were therefore no longer COC's. The 2004 study failed to provide conclusive data as the full extent of soil contaminated with PCB's greater than 1.0 mg/Kg at SS003, but the study did document PCB concentrations in soil up to 49 mg/Kg.

A Follow-On Remedial Investigation was conducted in 2008 in order to better define the extent and concentration of the PCB contamination at SS003 Anvil Mountain RRS site. The study defined 4 distinct areas at SS003 where the PCB's are concentrated and they are: the Former Composite Building, Equipment Maintenance Building, northeast antenna, and Former Temporary Garage. The highest levels of PCB in soil were located adjacent to the northeast antenna where 2 samples had concentrations of 1,040 and 2,090 mg/Kg respectively. The depth of contamination was generally 6-12" bgs but ranged up to 48" bgs

Excavation of PCB contaminated soil commenced on 8 July 2010. A total of 692 and 78 soil samples were collected in 2010 for onsite and offsite analysis respectively. The total area of the 2010 excavations was approximately 24,148 square feet. From the excavated areas, 3,606,368 pounds of contaminated soil was shipped to Arlington, Oregon in 2010 for disposal and an additional 543,084 pounds of contaminated soil was placed in super sacs and stored onsite awaiting shipping and disposal in 2011. A total of 1276 soil samples were collected in 2011 for onsite analysis. The total area of the combined years excavations exceeds 63,500 square feet. In 2011, 4,502,508 pounds of contaminated soil was shipped to Arlington, Oregon for disposal. This amount includes 305,800 pounds of soil with PCB concentrations greater than 50 mg/Kg. The analytical results illustrate that the PCB concentrations in the soil remaining at the site is below 1.0 mg/Kg.

Contaminants of Concern
The following contaminants of concern, those above approved cleanup levels in, were identified during the course of the site investigations summarized in the Characterization and Cleanup Activities section of this decision letter.

Diesel Range Organics (DRO)
Polychlorinated Biphenyls

Cleanup Levels – soil
Diesel range organics were detected in soil above the ingestion cleanup levels established in 18 AAC 75.341 (d), Table B2. Migration to groundwater soil cleanup levels are not applicable as groundwater is not present. PCB were above the direct contact level in Table B1. The approved cleanup levels for Anvil Mountain are 10,250 mg/kg DRO and 1 mg/kg PCB.

ADEC Decision
Remaining contamination in soil is below approved cleanup levels. This site will receive a "Closed" designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

- Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325.
- Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This determination is in accordance with 18 AAC 75.380 and 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.

If you have questions about this closure decision, please feel free to contact me at 907-269-0298 or Deb.Caillouet@alaska.gov.

Sincerely,

Deb Caillouet
Environmental Program Specialist