



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of
Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

555 Cordova Street
Anchorage, Alaska 99501
Phone: 907.269.7503
Fax: 907.269.7649
dec.alaska.gov

File No: 2102.38.066

April 23, 2013

Bruce Steely
673 CES/CEANR
6346 Arctic Warrior Drive
JBER, AK 99506-3240

Re: Draft PA/SI SA033 Otter Lake Road Drum Site JBER-Richardson, Alaska
dated March 2013

Dear Mr. Steely;

The Alaska Department of Environmental Conservation (ADEC) has received the above document on April 1, 2013 for review and comment. Attached is the comment form on the document for source area SA033 Otter Lake Road Drum Site, CS DB Hazard ID 25903.

Sincerely,

A handwritten signature in blue ink that reads "Louis Howard".

Louis Howard
Environmental Program Specialist

cc: Lori Aldrich Solid Waste Program

**Alaska Department of Environmental Conservation
Comments on the Draft PA/SI Report for SA034
JBER-Richardson, Alaska dated March 2013**

Commenter: Louis Howard (ADEC)

Comments Developed: April 24, 2013

Cmt. No.	Pg. & Line	Sec.	Comment/Recommendation	Response
1.	2-3	2.4	<p>Land Use Considerations</p> <p>ADEC Contaminated Sites Program has no objection to the site SA033 being transferred and included with the inactive Fort Richardson Landfill for Solid Waste Program Oversight, pending EPA concurrence.</p>	
2.	3-3	3.5	<p>Drum Removal</p> <p>The text states: "Four munitions and explosives of concern (MEC) were unearthed during drum removal and were promptly cleared and removed by JBER Explosives Ordnance Disposal (EOD) personnel." Please provide the EOD reports for each time EOD personnel responded to the site, the type of UXO items found, the location and depth the items were found, and the ultimate disposition these UXO items.</p> <p>ADEC is unaware of any reports by JBER to ADEC regarding stop work orders at SA033, notifications of EOD responses to SA033 via email, fax or phone calls.</p>	
3.	3-6	3.9	<p>Deviations from the Work Plan</p> <p>The text states: "Additionally, because of the difficulty of obtaining surface soil samples from frozen ground, photoionization detector (PID) field screening was not conducted at multiple sample locations."</p> <p>ADEC requests additional clarification be added to the text on how field screening was done for soil sampled (if any) or if samples were taken based on visual observations or best professional judgment by the field sampler without aid of field screening.</p>	
4.	4-3	4.3	<p>Soil Analytical Results</p> <p>Only surface soil samples were taken and the complete vertical and horizontal extent in the subsurface soil has yet to be conducted at SA034. Surface soil</p>	

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			samples for VOCs would tend to be lower in concentration than subsurface soil samples taken from the same location.	
5.	4-3	4.3.2	<p>VOCs and SVOCs</p> <p>The text states that 1,2,3-Trichloropropane was detected in only one location (SA033-SS06) at 0.00905 mg/kg. 1,2,3-Trichloropropane is used in the chemical industry as a solvent for oils and fats, waxes, and resins. Please be aware that the compound has also been used in paint thinner and varnish remover, and as a degreasing agent which is not out of the realm of historical uses on JBER-Richardson.</p>	
6.	4-4	4.3.5	<p>Metals</p> <p>The text states: "Table 4-3 presents the SL/source, maximum/minimum detected concentrations, JBER background concentrations, JBER Operable Unit (OU) maximum concentrations, and a range for Alaska surficial soils."</p> <p>Please provide a reference to the sources in the text for the reader to look up (i.e. E&E 1996, CH2MHILL 2004b, USGS 1988).</p> <p>JBER-Elmendorf and JBER-Richardson do not have the same geology and background metal concentrations; therefore, the generic "JBER" designation is not appropriate.</p>	
7.	4-11	Table 4-3	<p>Comparison of Detected Soil Metal Concentrations above SLs to JBER and Alaska Surficial Soil Concentrations</p> <p>This is the first reference to the sources of the background concentrations of metals that the reader encounters in the document, despite the fact that it is mentioned in numerous other places prior to this.</p>	
8.	6-1	6.0	<p>Recommendations</p>	

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			ADEC concurs with the recommendations to designate SA033 as NFRAP under JBER IRP with pending concurrence from EPA project manager. The rest of the recommendations shall be coordinated, reviewed, and approved by the Solid Waste Program staff (Lori Aldrich). There will be additional requirements under Solid Waste Program for SA033 portion of the inactive Fort Richardson Landfill not listed in this document. Please contact the Solid Waste Program staff. There should be a decision document signed by EPA, ADEC, JBER if and when EPA agrees that the SA033 site may be transferred to Solid Waste Program for oversight.	
9.	53 of the PDF	Figure 4-4	<p>Geophysical EMI Results</p> <p>Please locate on this figure or another figure, the location of the UXO items found during the field work for SA034.</p>	
10.	73 & 74 of the PDF	Daily Report	<p>11/02/2012 Report No. 005</p> <p>Summary of Work Performed Today</p> <p>1322- While excavator removed metal debris, an UXO was found. We retreated and I notified Range Control as well as Rich Horn and Mike Whitney.</p> <p>1345- Range Control onsite evaluated UXO and called EOD.</p> <p>1455- EOD onsite.</p> <p>1535- After going through proper procedures EOD team verified UXO was benign, removed it and gave us the OK to proceed.</p> <p>CHANGED CONDITIONS/DELAY/CONFLICTS ENCOUNTERED (List any conflicts with the project [i.e., scope of work and/or drawings], delays to the project attributable to site and weather conditions, etc.):</p> <p><input type="checkbox"/> UXO removal caused 2 hrs of standby.</p>	

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			<p>No EOD response report was included with the draft document. Please include the EOD report for response by EOD staff for UXO item found on 11/02/2012.</p> <p>No indication in the daily report was given if this UXO item was photographed and this was same the "UXO" item shown in Photograph 9 and in debris pile on page 76.</p>	
11.	77 and 78 of the PDF	Daily Report	<p>11/03/2012 Report No. 006</p> <p>Summary of work Performed Today</p> <p>1435- Found UXO 25ft northeast of grid stake #120.</p> <p>1450- Marked location and called Range Control. Also notified PM.</p> <p>1515- Range Control onsite, made assessment and notified EOD.</p> <p><i>As per Range Control, EOD is understaffed on Saturdays and their ETA cannot be determined.</i></p> <p>We decided to shutdown for the day and begun securing the site.</p> <p>CHANGED CONDITIONS/DELAY/CONFLICTS ENCOUNTERED (List any conflicts with the project [i.e., scope of work and/or drawings], delays to the project attributable to site and weather conditions, etc.):</p> <p><input type="checkbox"/> UXO removal caused 2 hrs of standby.</p> <p>No EOD response was ever noted in the draft document regarding the identity and disposition of the UXO item. No EOD report was included with the draft document for the UXO item found on 11/03/2012. Please include the EOD report which details the response by EOD team for this UXO item.</p>	

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12.	80 & 81	Daily Report	<p>11/05/2012</p> <p>Report No. 007</p> <p>Summary of Work Performed Today</p> <p>1545- Found UXO. Notified Range control.</p> <p>1642- EOD onsite, removed UXO and gave us the OK to go back to work.</p> <p>CHANGED CONDITIONS/DELAY/CONFLICTS ENCOUNTERED (List any conflicts with the project [i.e., scope of work and/or drawings], delays to the project attributable to site and weather conditions, etc.):</p> <p><input type="checkbox"/> UXO removal caused 1 hr of standby.</p> <p>No EOD response was noted in the draft document regarding the identity and disposition of the UXO item. No EOD report was included with the draft document for the UXO item found on 11/05/2012. Please include the EOD report which details the response by EOD team for this UXO item.</p> <p>General comment</p> <p>ADEC requests clarification in the text whether or not JBER will be pursuing investigation under the MMRP for the UXO items found and possible undiscovered UXO items in SA033. If not, please provide justification in the text as to why SA033 is ineligible for consideration under the MMRP.</p>	