



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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August 13, 2015

File: 630.38.003

Andrea Elconin
USACE
P.O. Box 6898
Elmendorf AFB, 99506-6898

Re: Decision Document; Unalakleet Air. Warning – Army Hill
Cleanup Complete Determination

Dear Ms. Elconin:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with Unalakleet Air. Warning – Army Hill Site located at Unalakleet, Alaska. Based on the information provided to date, the DEC 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 Unalakleet Air. Warning – Army Hill, which is located in the offices of the Alaska Department of Environmental Conservation (DEC) in Fairbanks, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Cleanup Complete Determination.

Introduction

Site Name and Location:

Unalakleet Air. Warning – Army Hill
Unalakleet D-4, T18S, R11W, Sec 15
Unalakleet, Alaska 99684

Name and Mailing Address of Contact Party:

Andrea Elconin
USACE
P.O. Box 6869
JBER, AK 99506-6869

Database Record Key and File Number:

ADEC Reckey: N/A

File: 630.38.003

Hazard ID: 25954

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

During World War Two (WWII), an aircraft runway was constructed near Unalakleet to support the transfer of aircraft to the Soviet Union under the Lend-Lease Agreement. Following WWII the US Air Force (Air Force) constructed the Unalakleet Air Force Station as part of their defense network of aircraft warning and communication relay systems. The Army Hill site (Site 16) is located on a hilltop northeast of the Barrel Disposal Area (Site 23). The site was primarily used for drum disposal.

Contaminants of Concern

During the investigations at this site, diesel range organics (DRO) were detected above cleanup levels. The metal and chromium were also detected at levels slightly above method two, migration to groundwater cleanup levels, however, the levels detected are reasonable levels for background in this area. Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Diesel Range Organics (DRO)

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
DRO	250

Cleanup Activities

This site consisted of 46 discarded 55-gallon military fuel drums (2 along the Air Force Road right-of-way and 44 along the hillside). During remedial actions (RAs) in 2002 and 2005, 45 of the military fuel drums were removed and approximately 13.25 cubic yards of contaminated soil was excavated from the site. DRO was detected at concentrations ranging from 280 mg/kg to 720,000 mg/kg, and chromium was detected at a concentration of 30 mg/kg. Pesticides, PCBs, PAHs, and eight RCRA metals were not detected above DEC Method 2 cleanup levels. Drums were disposed in the Unalakleet City landfill, and contaminated soil was transported off site for disposal at a permitted landfill.

During a 2010 removal action one remaining drum containing approximately 1 gallon of liquid was removed from the site. After the drum was drained and removed, the Sampling Technician examined the ground surface for visual contamination. No visual signs of contamination were noted.

The Sampling Technician collected one PID field screening soil sample from beneath the drum location. The sample was screened using the heated headspace technique described in the work plan;

the result (<2.2 ppm) as well below the action limit established in the work plan. No hydrocarbon odor or visually impacted soils were encountered during the draining and removal of the drum. Although no groundwater was encountered onsite, down-gradient residential groundwater wells were sampled in 2010-2011 and no contaminants of concern were identified.

All of the requirements listed in the ADEC Memorandum on Site Closure (dated 24 July 2009) have been met:

- Free product has not been detected at the site.
- Surface staining is not present at the site.
- Cumulative risk standards have been achieved.
- Residual contaminant concentrations will not require institutional controls.
- Groundwater contaminant plumes are not present.
- Residual contamination will not cause a violation of 18 AAC 70.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC’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 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis exposure	Site DRO contamination has been excavated and removed from the site to levels below the migration to groundwater cleanup level. This result is well below direct contact CUL of 10,250 mg/kg
Sub-Surface Soil Contact	De-Minimis exposure	Site DRO contamination has been excavated and removed from the site to levels below the migration to groundwater cleanup level. This result is well below direct contact CUL of 10,250 mg/kg
Inhalation – Outdoor Air	Pathway Incomplete	De-Minimis DRO contamination remains in the subsurface, but VOCs are not a concern for the Site.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings at the site, De-Minimis DRO contamination remains in the subsurface but VOCs are not a concern.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered during the investigations. Down-gradient wells were sampled and did not result in detections of contaminants of concern.
Surface Water Ingestion	Pathway Incomplete	The site is on a hilltop. Surface water is not present on the Site.

Wild Foods Ingestion	Pathway Incomplete	The site is on a rocky hilltop with very little vegetation. Remaining subsurface DRO contamination is isolated, De Minimis and is unlikely to migrate or be taken up by plants.
Exposure to Ecological Receptors	Pathway Incomplete	The site is on a rocky hilltop with very little vegetation. Remaining subsurface DRO contamination is isolated, De Minimis and is unlikely to impact ecological receptors.

Notes to Table 1: “De-Minimis exposure” means that in DEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in DEC’s judgment contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

The cleanup actions to date have served to excavate and adequately remove contaminated soil from the site. Based on the information available, DEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Cleanup Complete determination has been granted, DEC approval is required for off-site soil disposal in accordance with 18 AAC 75.325(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 75.380 (d) and does not preclude DEC 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 questions about this closure decision, please contact the ADEC project manager, Joy Whitsel at (907) 451-2156 or by email at joy.whitsel@alaska.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Vreeman", with a long horizontal flourish extending to the right.

Fred Vreeman
Environmental Program Manager

cc: Joy Whitsel, DEC, via email