STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File No. 2264.38.019

December 17, 2009

Mr. Mark Ridgway
United States Coast Guard
Civil Engineering Unit Juneau
Post Office Box 21747
Juneau, Alaska 99802-1747

Re: USCG Potato Point Radar Facility
Site Closure Determination

Dear Mr. Ridgway:

In a letter dated December 10, 2007, the Alaska Department of Environmental Conservation (DEC) notified you as to its approval of the *2005 Potato Point Biocell Closure and Aboveground Storage Tank Removal Report* and of the subsequent requirements for closure for the United States Coast Guard (USCG) Potato Point Radar Facility site near Valdez, Alaska. A copy of this letter is enclosed. Prior to DEC being able to make a closure determination on these sites, DEC needed to obtain documentation that an institutional controls tracking system would ensure that soils containing concentrations of contaminants of concern above the most stringent default pathways present at these sites cannot be moved off the USCG Potato Point Radar Facility site without DEC approval.

To date, DEC has not been informed that the USCG has developed a tracking system for institutional controls. On July 24, 2009, DEC adopted a new policy for site closure. A copy of the memorandum is located on our website at the following link, http://www.dec.state.ak.us/spar/csp/guidance/closurememo.pdf. According to our new policy, for sites with lower-level petroleum soil contamination where groundwater is not contaminated, DEC is able to issue a closure determination without the USCG having established an institutional controls tracking system. As there is soil remaining with concentrations which exceed DEC's default cleanup level for diesel-range organics, the USCG still needs to place an institutional control which ensures that the contaminated soil will be managed in accordance to DEC guidance and regulations.

DEC has determined that the USCG Potato Point Radar Facility site can be closed.

Please note that if in the future additional contamination is found to be present that may pose an unacceptable risk to human health, safety, welfare or the environment, it must be reported to DEC and additional cleanup may be required.

If you have any questions about these sites, please do not hesitate to contact me 766-3184.

Sincerely,

Anne Marie Palmieri
Environmental Program Specialist

Enclosure

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
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File no.: 2264.38.019

April 10, 2006

Mr. Mark Ridgway
United States Coast Guard
Civil Engineering Unit Juneau
Post Office Box 21747
Juneau, Alaska 99802-1747

Re: Approval of Final Report and Requirement for Closure
USCG Potato Point Radar Facility, reckey: 1991240111602

Dear Mr. Ridgway:

The Alaska Department of Environmental Conservation (department) has completed review of the *Potato Point Biocell Closure and Aboveground Storage Tank Removal Report* for the USCG Potato Point Radar Facility site near Valdez, Alaska, prepared by Jacobs Engineering Group, Inc. and dated December 2005. This report meets the requirements of 18 Alaska Administrative Code (AAC) 75.380, and is approved.

The Potato Point Radar Facility is located approximately 10 miles southwest of Valdez in Prince William Sound. In 1990, a faulty fuel line released diesel fuel from a large aboveground storage tank which was connected to a generator day tank. A cleanup action was conducted and 1200 cubic yards (cy) of diesel contaminated soil were placed in an on-site biocell. A site closure/no further action letter regarding the cleanup was issued by the department on September 15, 1994 with the biocell highlighted as the sole remaining site issue. A cleanup level of 18 AAC 75.341, Table A1, Category C was approved; specifically 1000 milligrams per kilogram (mg/kg) diesel-range organics.

Soil samples in the biocell were collected in 1996 and 1997 and demonstrated that the contamination levels remained above the cleanup level. A biocell sampling and closure workplan was approved by the department in a letter dated May 9, 2005. This workplan proposed a phased approach with biocell dewatering and sampling to be conducted in the first phase and if the results were below the cleanup level, then biocell decommissioning in the second phase.

In May 2005, site activities began with the pumping of the over two (2) feet of accumulated water from the surface of the biocell. Approximately 39,556 gallons of water was removed and disposed of to the ground surface. A water sample was collected and analyzed for total aqueous hydrocarbons and total aromatic hydrocarbons; the analytical results showed that the water met the Alaska Surface Water Quality Standards and could be discharged.

A total of 30 primary soil samples were collected from the biocell, with one (1) sample collected at three (3) discrete intervals (3-4 feet below ground surface (bgs), 7-9 feet bgs, and 10-12 feet bgs) at 10 separate sampling locations. Analytical results for 29 of the samples were below the diesel-range organics cleanup level and ranged from non-detect to 682 mg/kg. One (1) sample collected at the 10-12 feet bgs depth showed a concentration of 3390 mg/kg, exceeding the cleanup level. The mathematical mean of the sampling results is 330 mg/kg. By using the statistical software *ProUCL*, the 95-percent upper confidence limit (UCL) was calculated to be 513 mg/kg with the *Approximate Gamma UCL* approach recommended by the software following its analysis of sample result distribution. This method of determination of the 95-percent UCL is acceptable.

Requirements for Closure

The cleanup levels for the biocell were achieved as demonstrated by the use of the 95-percent UCL. The cleanup levels were based upon a level which is appropriate for the soil where it currently resides and may not be appropriate for the soil if it is moved to another location. For sites with soil containing concentrations of contaminants of concern which exceed the department's most restrictive cleanup levels of 18 AAC 75.341, Tables B1 and B2, specifically 250 mg/kg diesel-range organics, the department now requires that the presence of the soil be tracked so that it can be managed in accordance with 18 AAC 75.325(i) in the future.

Therefore, the department requests that the United States Coast Guard determine a method of tracking the presence of this soil to ensure that it does not inadvertently become excavated and disposed of in an inappropriate manner. The department will determine if the tracking method is acceptable, thus it would be beneficial for our agencies to confer prior to proposal. Other federal agencies, such as the United States Forest Service and National Park Service, have successfully used a geographical information systems (GIS) database as a tracking tool. Following the implementation of this tracking system and the inclusion of this site, the department will issue a no further remedial action planned letter for this site. An institutional control established action will be included on the department's Contaminated Sites database.

If you have any questions about this site, please do not hesitate to contact me at 269-7545 or Anne Marie Palmieri, of my staff, at 766-3184.

Sincerely,

John Halverson
Environmental Program Manager

cc: Anne Marie Palmieri, DEC Haines