STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

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CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

September 13, 1989

Colonel Rastus O. Massey
Headquarters AAC
21 CSG/CC
Elmendorf Air Force Base, AK 99506

SUBJECT: NOTICE OF VIOLATION/REQUEST FOR CORRECTIVE ACTION
Four Million Gallon Hill Product Seep
Elmendorf Air Force Base, Alaska

Dear Colonel Massey:

On July 25, 1988 ADEC and EPA conducted an UST/LUST compliance inspection on Elmendorf Air Force Base. During the inspection the petroleum product seep at the site known as Four Million Gallon Hill was visited. Petroleum product was seen seeping out of the base of the road cut and migrating east and west along the roadside drainage ditch. At the time of the inspection and in an August 31, 1988 inspection report to the U.S. Environmental Protection Agency I requested that actions be taken to collect and properly dispose of seeping product which enters the ditch. After numerous informal attempts to get the Air Force to take the requested corrective action, the Department was informed on August 7, 1989 that a horizontal pipe dam had finally been installed in the ditch to contain the petroleum product. The pipe dam was inspected during an August 16, 1989 visit escorted by Joe Williamson. Evidence of erosion was identified on the downgradient face of the dam.

During a September 12, 1989 telephone conversation with Joe Williamson I asked for a status report on the condition of the pipe dam. Mr. Williamson told me that as presently constructed the dam may not remain intact until next spring. Mr. Williamson told me that steps would be taken to improve it, however no date for project implementation could be provided.

The Department is concerned about the unreasonable length of it is has taken the Air Force to contain the seep. The Department is concerned that recent rainfall or spring runoff may result in a break of the pipe dam and subsequent downgradient petroleum contamination in the ditch.

The petroleum seep is a violation of AS 46.03.710 (Pollution of the Air, Land, Subsurface Land or Water of the State Prohibited), and AS 46.03.740 (Discharge of Petroleum or Petroleum Products without a Permit Prohibited) and associated regulations.

According to AS 46.04.020 (a) (Removal of Oil Discharges), a person causing or permitting the discharge of oil shall immediately contain and clean up the discharge. According to AS 46.04.020 (b), the containment and clean up activities must be carried out in a manner approved by the Department.

The Department requests that it be provided with a report within five (5) working days of receipt of this letter, outlining actions the Air Force will take to ensure that the seep will remain contained, until such time that the contaminated site can be cleaned up.

If you have any questions please contact me.

Sincerely,

Ronald S. Klein
Contaminated Site Investigations

cc: Joe Williamson, 21st CES/DEEV, EAFB
Mike Drewitt, AAC, EAFB
Doug Johnson, EPA, Anchorage