ACTION MEMORANDUM

for a
TIME-CRITICAL REMOVAL ACTION
OF PCB-CONTAMINATED SOIL

PORT HEIDEN RADIO RELAY STATION
PORT HEIDEN, ALASKA

Prepared By
United States Air Force
611th Civil Engineer Squadron
Pacific Air Forces
Joint Base Elmendorf-Richardson, Alaska

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AT THE
PORT HEIDEN RADIO RELAY STATION,
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I. PURPOSE

The purpose of this Action Memorandum is to document the decision by the U.S. Air Force (USAF) to conduct a Time-Critical Removal Action (TCRA) to remove Polychlorinated Biphenyls (PCB) contaminated soil from the access road (shoulders and adjacent areas) running from the Port Heiden airport to the Port Heiden Radio Relay Station (RRS), Port Heiden, Alaska. This TCRA will be performed to prevent, limit, and mitigate a substantial threat to public health, welfare, or the environment.

This document is issued in accordance with and satisfies the requirements of the Comprehensive Environmental Restoration, Compensation and Liability Act (CERCLA, at 42 USC 9601 *et. seq.*), as further implemented by the National Contingency Plan (NCP, at 40 CFR Part 300). The Installation Restoration Program (IRP) is authorized in the Defense Environmental Restoration Program (10 USC 2701 *et. seq.*) as the environmental restoration program the military services are to use to take CERCLA response actions and satisfy its CERCLA lead agency functions as delegated by Executive Order 12580. This document is consistent with requirements in Alaska State law and regulations, including but not limited to Title 46 of the Alaska Statutes and regulations promulgated there under.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Physical Location and Description

The former Port Heiden RRS site is located on the north side of the Alaska Peninsula, approximately 400 air miles southwest of Anchorage (figure 1). The Former RRS is located about 6 miles north of the village of Port Heiden. Besides buildings, it contained a drum storage area, a landfill, underground storage tanks, lagoons (where contaminants were disposed), a septic system, and debris burial areas.

Several dirt roads connect the installation to the Village of Port Heiden. Access to the area is by air or barge. The former Port Heiden RRS site is approximately 3,000 feet from the air strip which is serviced by small commercial carriers. The gravel air strip is approximately 6,000 feet long. Gravel roads connect the air strip, Village of Port Heiden,

barge landing area, the landfill, and the Port Heiden RRS. The roads are in moderately good condition.

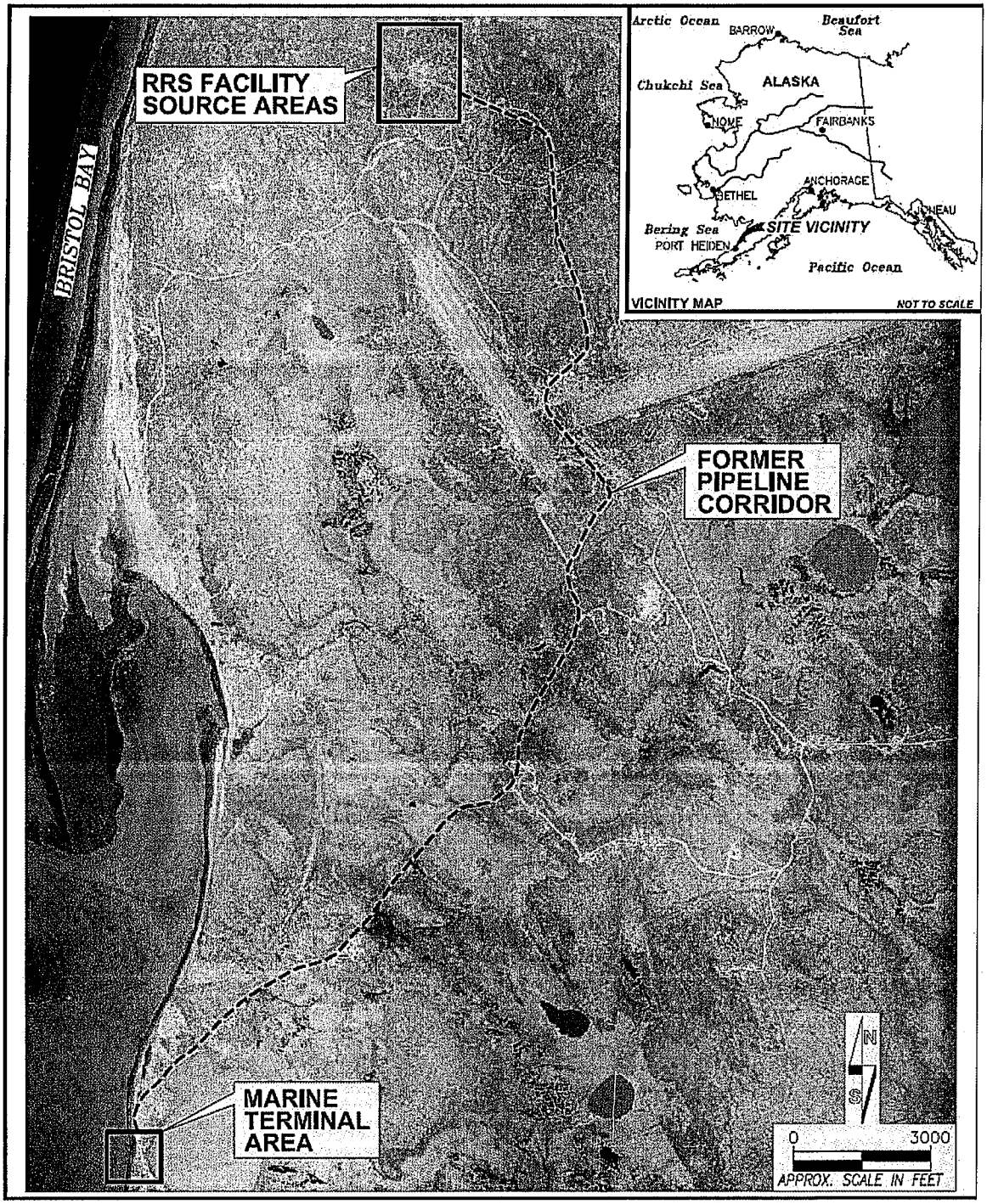

Figure 1 – Location Map

Approximately 100 people live in the Village of Port Heiden. Landowners within the Port Heiden RRS include the Alaska Peninsula Corporation, the Alaska Department of Transportation (AKDOT), and the United States Air Force (USAF).

2. Site Operations History

The former site was constructed during 1955-1960 as a Distant Early Warning (DEW) line radar station, and was active until 1981. From 1990 through 1992, the United States Army Corps of Engineers (USACE) demolished all buildings and structures at the facility and buried them in a landfill just east of the former Port Heiden RRS gravel pad.

3. Removal Site Evaluation

The removal site evaluation pertains to PCB contaminated soil located on and in the vicinity of the access road to the Port Heiden RRS (figure 2). During a 2009 removal action at the RRS, a dump truck overturned. During the clean-up from the truck accident, PCB-contaminated soil was identified on the access road. In 2010, additional samples were taken at the locations shown in Figure 2.

Air Force responsibility for the cleanup was not clear until early 2011. During a 2011 USACE TRIAD meeting for a Fort Morrow project, comments from community members indicated this road is used to access subsistence areas.

With the road being used to haul subsistence foods back to community member's homes, sampling results indicated the food was subject to potential direct exposure to PCB-contaminated soil as the vehicles drove the access road raising a dust cloud. This is an on-going concern for community members as a new subsistence season is rapidly approaching.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Interviews with local area residents indicated that the USAF oiled the access road. During the era the RRS was active, PCBs were common in used oil. Historical aerial photographs also show this road did not exist before the USAF constructed the RRS. It is unknown as to how or when specifically the road oiling occurred. Currently there are no remaining known sources that could attribute to subsequent releases at the site.

B. Other Actions to Date

1. Previous Actions

The access road was not investigated during the 2004 RI or previous investigation. After the 2009 truck accident, samples were taken. Additional surface samples were taken on the road in 2010. Samples at various depths and along the shoulders were taken in early 2011. A final report is not yet available for these results.

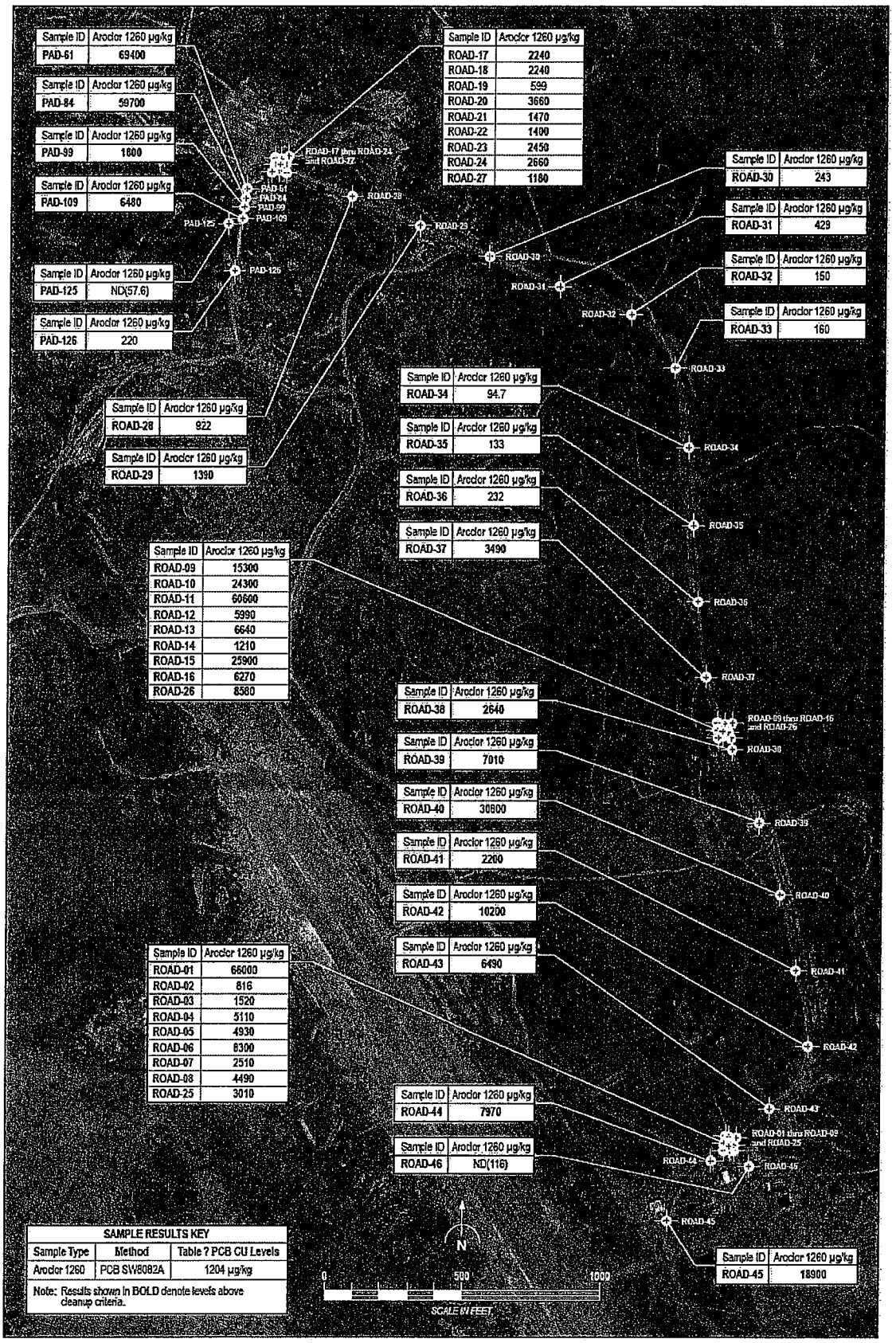

Figure 2 - Sample Locations (note sample results are draft)

2. On-going Actions

Apart from the TCRA discussed in this Action Memorandum, there are no on-going environmental actions on the road. However, the road is required for access to the RRS for other on-going CERCLA remediation projects at the RRS in the summer of 2011.

3. Planned Actions

This TCRA will help determine the extent of the PCB-contamination in the road area. If necessary, additional projects will be planned. This TCRA, utilizing excavation and off-site disposal, is consistent with current and future remediation efforts at the RRS. CERCLA phases are currently pending at other sites related to the RRS and have been tentatively planned through 2041.

C. Federal and State Involvement to Date

1. Federal Agencies

With the discovery of the PCB contamination on the site in 2009, the 611 CES/CEAR initiated contact with Environmental Protection Agency (EPA) describing the PCB contamination. EPA will be provided an opportunity to comment on this proposed TCRA Action Memorandum.

2. State Agencies

The Alaska Department of Environmental Conservation (ADEC) was initially informed of the discovery of the PCB contamination on 20 Aug 2009.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The threats posed by the PCB-contaminated soils at the former Port Heiden RRS are time-critical based on their presence in the vicinity of nearby human populations, and plants and animals used as a subsistence food source. It is difficult to control access to the road, and due to the relatively flat and open terrain access points are almost unlimited. The initial assessment of the site indicated that traffic through the area has not substantially spread the PCB contamination; however more sampling off the road will be required. One other primary concern is the road use can create dust and it is possible PCB-contaminated dust could come into direct contact with people and subsistence foods. The appropriateness of the removal action is based on the following factors listed in 40 CFR 300.415(b)(2) of the NCP:

(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
(ii) High levels of hazardous substances or pollutants or contaminants in soils, largely at or near the surface, that may migrate.

B. Threats to the Environment

The threats to the environment posed by the PCB contamination have not been quantified.

C. Statutory and Regulatory Authorities

PCBs are hazardous as determined by the Toxic Substances Control Act (TSCA) of 1976, CERCLA and ADEC regulations. The PCB contamination levels in the soil exceed 50 mg/kg (the level at which the contaminated soil becomes a TSCA regulated waste). The concentrations of PCBs in the soil at the site present a threat to public health or welfare or the environment. The TCRA presented in this memorandum is consistent with 40 CFR 300.415(e)(8) – which states, *"Containment, treatment, disposal, or incineration of hazardous materials – where needed to reduce the likelihood of human, animal, or food chain exposure."*

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of PCB contamination from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The Removal Action Objective (RAO) of the TCRA is to eliminate the immediate threat to human health or the environment posed by PCB-contaminated soil on the roadway surface. The RAO is to be obtained by excavating and disposing of all PCB contaminated soil with concentrations greater than 1 mg/kg.

As part of the TCRA or follow-on work, soil samples will be collected from the suspected areas of contamination. All PCB-contaminated wastes will be containerized and labeled in accordance with Department of Transportation (DOT) standards. All TSCA regulated wastes (PCBs > 50 mg/kg) will be segregated and stored in specific containers, in preparation for off-site disposal at a TSCA-regulated disposal facility. All

non -TSCA regulated wastes, (PCBs between 1 and 50 mg/kg), will be segregated, and stored for subsequent off-site disposal in accordance with ADEC regulations.

2. Contribution to Remedial Performance

The TCRA will achieve the general Removal Action Objective by mitigating the immediate potential threat to human health and the environment. The objective will be met by removing approximately 4,900 cubic yards of PCB contaminated soil and eliminating the direct exposure potential to the PCB contamination.

3. Applicable or Relevant and Appropriate Requirements (ARARS)

This TCRA met the following ARARs to the extent practicable:

Federal

1) Toxic Substances and Control Act of 1976, title 40 Code of Federal Regulations (CFR) part 761.65 and part 761.207-218, certain federal regulations for PCB manifests, transportation and disposal.

2) Department of Transportation title 49 CFR, parts 170 – 180. These federal regulations are for hazardous materials transportation.

State

The substantive requirements of the Alaska Department of Environmental Conservation regulations: The State of Alaska Title 18 Alaska Administrative Code (AAC) Chapter 75 details cleanup operation requirements and cleanup criteria for contaminated sites in the State of Alaska.

4. Project Schedule

The access road is to be remediated in 2011. The project is currently funded at $5,000,000 of a $7,201,334 expected total requirement. Additional funding has been requested. The priority, to eliminate/reduce the current threat, will be the removal of the PCB-contaminated soil from the road (which is expected to be completed within the current funding). Then, as funding allows, the PCB-contaminated soil will be disposed of at appropriate permitted facility(s) in the Lower 48. If additional funds are not received in time to complete all disposal activities this year, the final disposition may not be completed until 2012.

B. Costs

The cost for the TCRA is estimated at $7,201,334. This is based on a cost-reimbursement contract issued by USACE.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delayed action, or no action, will increase the potential for the migration of PCB-contamination over a wider area. No action or a delayed action, could affect subsistence resources, damage the environment, or endanger human health. PCB contamination will potentially impact area wildlife and therefore the Alaska Native subsistence resources. Contamination may potentially be transported to humans through the impacted wildlife and used for subsistence as well as direct exposure traveling the road.

VII. OUTSTANDING POLICY ISSUES

None

VIII. PUBLIC PARTICIPATION

Close communications and coordination is being maintained with the local community. Several public meetings were held, including meetings with the federally-recognized tribe as well as the city government. The community supports the plan to excavate and dispose of the contaminated soil off-site.

IX. ENFORCEMENT

There are no enforcement activities on-going related to this TCRA. The USAF is voluntarily conducting this remediation as a part of the Defense Environmental Restoration Program.

X. RECOMMENDATION

This Action Memorandum documents the decision for the TCRA for PCB contaminated soil on the access road to the former Port Heiden RRS and adjoining areas. This decision has been developed in accordance with CERCLA, as amended and is consistent with the NCP. This decision is based on the administrative record file for the site. Conditions at the site meet the NCP section 300.415(b)(2) criteria for determining that the removal action was appropriate. The EPA and the ADEC have been participants in the planning and implementation of this action and supported the recommended action.

XI. SIGNATURES

These signatures document the decision made to complete the TCRA for the access road to the Port Heiden RRS. By signing this action memorandum, the ADEC concurs with the Air Force's selected TCRA. The decision may be reviewed and modified in the future if new information becomes available that indicates the presence of contaminants or exposures that may cause unacceptable risk to human health or the environment. If additional contaminants are discovered, USAF and ADEC will determine the compliance levels for soil cleanup actions.

5 May 2011

ROBYN M. BURK, Colonel, USAF — Date
Commander, 611th Air Support Group

5/6/2011

JOHN HALVERSON, Environmental Program Manager — Date
Federal Facilities Section, Contaminated Sites Program
Alaska Department of Environmental Conservation