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January 10, 2020

Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
555 Cordova Street
Anchorage, AK 99501-2617

Attn: Louis Howard, Environmental Program Specialist III

REF: Demolition of CHPP (Project No. 8046), JBER-R, Alaska

SUBJ: Notice of Completion of all Demolition Activities and Summary of Soil Contamination Encountered during the Project and Foundation Left in In-Place

Dear Mr. Howard,

Per your email request on November 13, 2019, please accept this letter as formal confirmation that Doyon Utilities (DU) has completed all JBER-R CHPP demolition activities. Because there are no utilities currently present at the site, DU no longer possesses a right to access or other easement for the site. The site is now in control of the Air Force (673rd Civil Engineering Squadron (CES)) to conduct any further activity related to contamination left at the site. DU has inquired to CES if official paperwork is required to document this easement abandonment.

The JBER CHPP demolition project identified soil contamination. In addressing the contamination, DU prepared and submitted many reports and updates. For your ease of reference in closing this matter, we believed it would be helpful to provide a high-level summary of the soil contamination encountered during the project, the particular details of which can be found in previously submitted documents.

Environmental Management, Inc, (EMI) described the soil contamination encountered during the project in its January 9, 2019 *Report on All Interim Soil Removal Actions,* submitted to ADEC January 24, 2019. EMI described *Screening and Sampling Soils during the Oil-Water Separator Removal* in its letter dated and submitted to ADEC on September 26, 2019. These two EMI reports summarize the known contaminated soil remaining on site and present the sample data collected on the in-situ soils. The reports identified the following specific areas where POL polluted soils were removed, and residual contamination remains:

1) Old Transformer Area: While a total of 1,431 tons of POL polluted soils were removed from the Old Transformer Area, the confirmation sampling of the sidewall at the south end of the excavation showed polluted soils remaining above the clean-up level in this area. Confirmation sampling on the north end of the excavation showed no evidence of contamination above project action levels at this location. However, the south end polluted

soils at this location is connected to the large area of contamination left under the former CHPP basement floor.

2) Under Basement Floor of CHPP: One large area of POL contaminated soils remains at the site below the Basement Floor near the former locations of the south and east sides of the building. The full extent of this area is unknown, as delineating it was outside the scope of the CHPP demo project. Based on visual observations, soils represented by a characterization sample (CHPP_XC_500_E7) are part of an area of contamination that appears to extend over a large area below the floor of the basement and in the ground water throughout much of the southern and eastern part of the CHPP.

The southern and eastern limits of this contamination was not anticipated. The project's 2012 Preliminary Assessment/Site Investigation (PA/SI) investigation did not identify any area of concern, this included research into JBER-R historical records. Please note that this contamination was not encountered during demolition of the north and west walls of the CHPP, and it appears to be limited to the south and east ends of the CHPP. Before excavation was stopped, some contaminated soils from this area that had inadvertently been removed were placed back in the excavation in the area with known contamination remaining.

3) Fuel Pump House: One super sack of POL contaminated soil was removed from a spot (AOC04-02) by the Fuel Pump House. This was a spot previously identified in the 2012 PA/SI as having benzene above the project action level. However, after the removal some POL contaminated soil still remains in the area outside the project limits.

The areas described above are depicted in Figures 1 and 2 of the January 9, 2019 *Report on All Interim Soil Removal Actions* along with the coordinates of all samples of soils remaining that had POL compounds detected. Figures 1&2 from the January 2, 2019 report are attached.

4) Oil-Water Separator (OWS): Two samples at the OWS area identified low levels of POL contamination in the 2012 PA/SI report. The small quantity of soil around these was moved to be able to remove the OWS system. This soil was placed back in the excavation and its location was surveyed. The details of this activity are included in EMI's September 25, 2019 letter on *Screening and Sampling Soils during the Oil-Water Separator Removal.*

5) Remaining Concrete Structures: As background to why these partial foundations remain in place, on September 25, 2018 during the demolition and excavation activities, differing site conditions were encountered. Petroleum contamination was encountered under the turbine and boiler room basement floors and outside of the west foundation wall of the boiler building. To access these areas located approximately 30 feet below the groundwater surface, the project had a ADEC approved dewatering program in place. The dewatering permit required the discharge to be shut down if a sheen was detected. Maintaining dewatering activities was essential to limit the exacerbation of contamination within the excavation and for completion of foundation demolition, backfill, and compaction. After a series of meetings and discussions between September 25, 2018 and

October 10, 2019 among representatives of DU (K.Hook. S.Hatzis), CEI (S.Durand), EMI (L.Helgeson) JBER (M.Prieksat, S.Scheevel, T.Berg), DLA (E.Wolfe) and ADEC (J.Halverson), the consensus among the stakeholders was that these soils and partial foundations should remain in place. Attached is a Figure *JBER CHPP Demo Below Grade Concrete Structures Remaining in Place* which outline where the concrete foundations remain in place.

DU confirms its understanding that because all known regulated PCBs have been removed from the boundaries of the construction site. Future investigations in this area should not be subject to TSCA regulations related to PCBs.

Nonetheless, other areas of contamination were identified in the PA/SI report for the site (Tutka 2012). Several of these smaller areas were cleaned up and confirmed clean with appropriate samples. Those are discussed in more detail in the January 9, 2019 EMI *Report on All Interim Soil Removal Actions.* Areas that were not impacted by demolition activities were outside the scope of this project and are not addressed by this letter.

Please advise if you have a different understanding as outlined by this correspondence.

At this point, any further investigation of this site will be the responsibility of the property owner, the U.S. Air Force. DU understands that the owner will coordinate any future investigations or other activities in accordance with CERCLA and appropriate ADEC regulations.

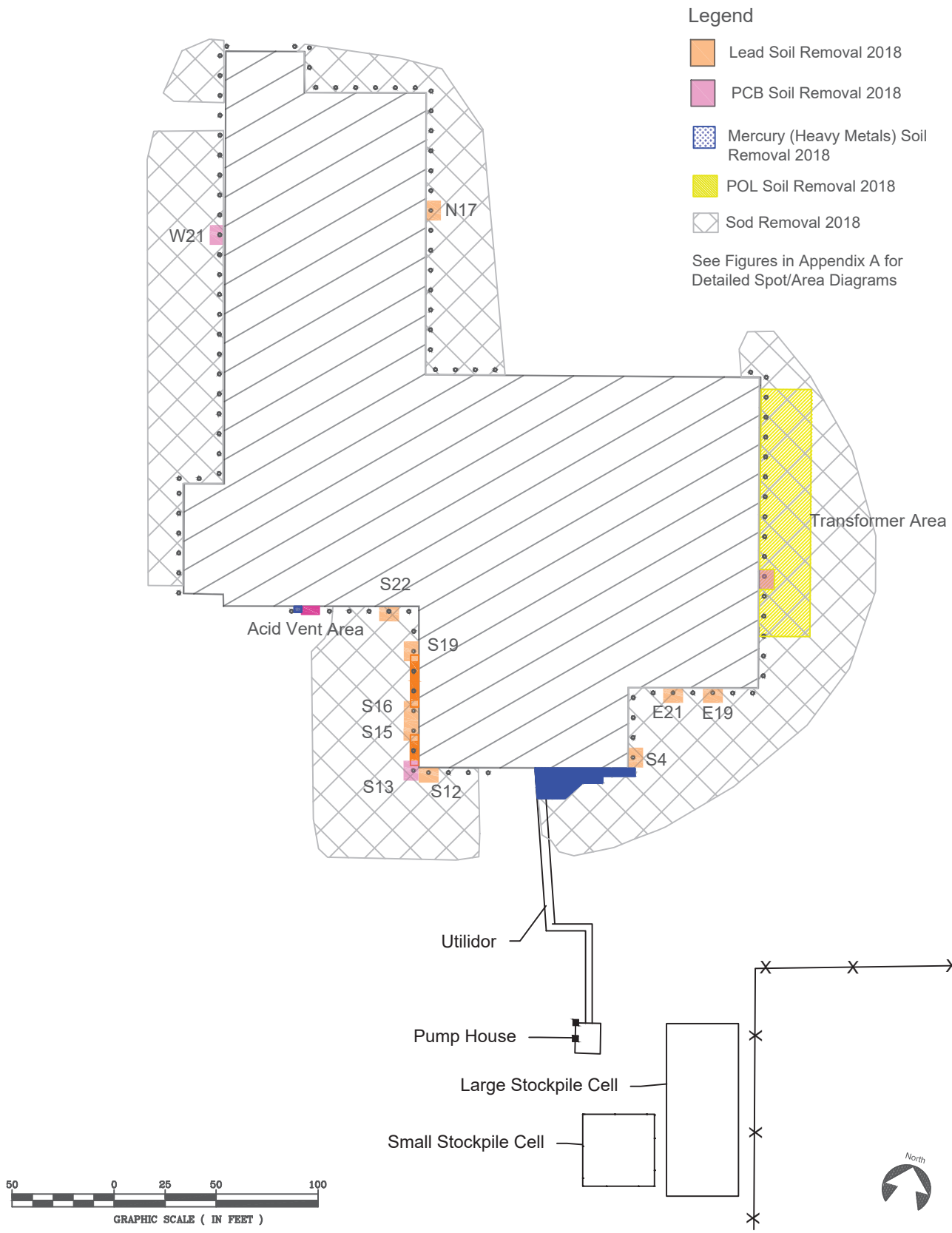
Sincerely,

K Hook

Kathleen Hook
Director of Environmental Affairs

Attach: January 9, 2019 *Report on All Interim Soil Removal Actions,* Figure 1
January 9, 2019 *Report on All Interim Soil Removal Actions,* Figure 2
JBER CHPP Demo Below Grade Concrete Structures Remaining in Place

cc: W. Schmaltz (ADEC)
S. Halstead (EPA)
S. Scheevel (JBER 673 CES)
S. Jeffords (JBER 673 CES)
J. Dorsey-Spitz (JBER 673 CES)
E. Godden (JBER 673 CES)
D. Aide (JBER 673 CES)



SITE OVERVIEW SOIL REMOVAL LOCATIONS	CHPP DEMO JBER, AK	EMI Consulting, Engineering & Training	PREPARED: HJD DRAWN: HJD REVIEWED: LAH DATE: 1/3/19	FIGURE 1

Locations of the Samples with Detected POL Remaining On Site

Sample ID	Northing	Easting	Depth (ft bgs)	Results
CHPP_XC_400_A1	2647553	1691836	16	ISSRA Add01
CHPP_XC_500_A5	2647514	1691845	16	ISSRA Add01
CHPP_XC_500_A7	2647495	1691849	16	ISSRA Add01
CHPP_XC_500_E7 (500_A7)	*2647495*	*1691849*	16	ISSRA Add01
CHPP_XC_500_A11	2647562	1691834	16	ISSRA Add01
CHPP_XC_500_A13	2647582	1691829	16	ISSRA Add01
CHPP_XC_500_A15	2647601	1691826	16	ISSRA Add01
CHPP_XC_500_B1	2647555	1691846	16	ISSRA Add01
CHPP_XC_350_B4	2647526	1691852	11	ISSRA Add01
CHPP_XC_500_B9	2647478	1691862	16	ISSRA Add01
CHPP_XC_50_C2	2647547	1691857	1	ISSRA Add01
CHPP_XC_100_C3	2647538	1691859	3	ISSRA Add01
CHPP_XC_100_C6	2647509	1691866	3	ISSRA Add01
CHPP_XC_100_C8	2647490	1691870	4	ISSRA Add01
CHPP_XC_50_C9	2647480	1691872	0	ISSRA Add01
CHPP_XC_50_D2	2647550	1691867	1	ISSRA Add01
CHPP_XC_50_D6	2647511	1691875	1	ISSRA Add01
CHPP_XC_50_D7	2647502	1691877	1	ISSRA Add01
CHPP_XC_50_D8	2647492	1691879	1	ISSRA Add01
CHPP_XC_50_E9 (50_D9)	*2647482*	*1691882*	*1*	ISSRA Add01
East Wall 2	2647486	1691885	2	ISSRA
CHPP_South Sidewall 1	2647480	1691869	2	Table A4
CHPP_AOC04-02_B2	2647270	1691803	4	Table A15
Utilidor/PH-01	2647268	1691806	3	Table A15

Table Notes:

Northing/Easting:	=See Table 2 for Northing and Easting site references
CHPP_AOC04-02-B2:	**=Denotes sample above the Action Level**
CHPP_XC_500_E7 (500_A7):	=Duplicate sample (Original Sample- Abbreviated)
bgs:	=Below Ground Surface
ft:	=Feet
ISSRA Add01:	=Report on Addendum01 (Additional Characterization) for Work Plan on Interim Soil Spot Removal Actions for the Central Heat and Power Plant Demolition Joint Base Elmendorf/Richardson, AK Project Number P8046, May 22, 2018
ISSRA:	=Report on Work Plan on Interim Soil Spot Removal Actions for the Central Heating and Power Plant Demolition Joint Base Elmendorf/Richardson, AK Project Number P8046, February 15, 2018

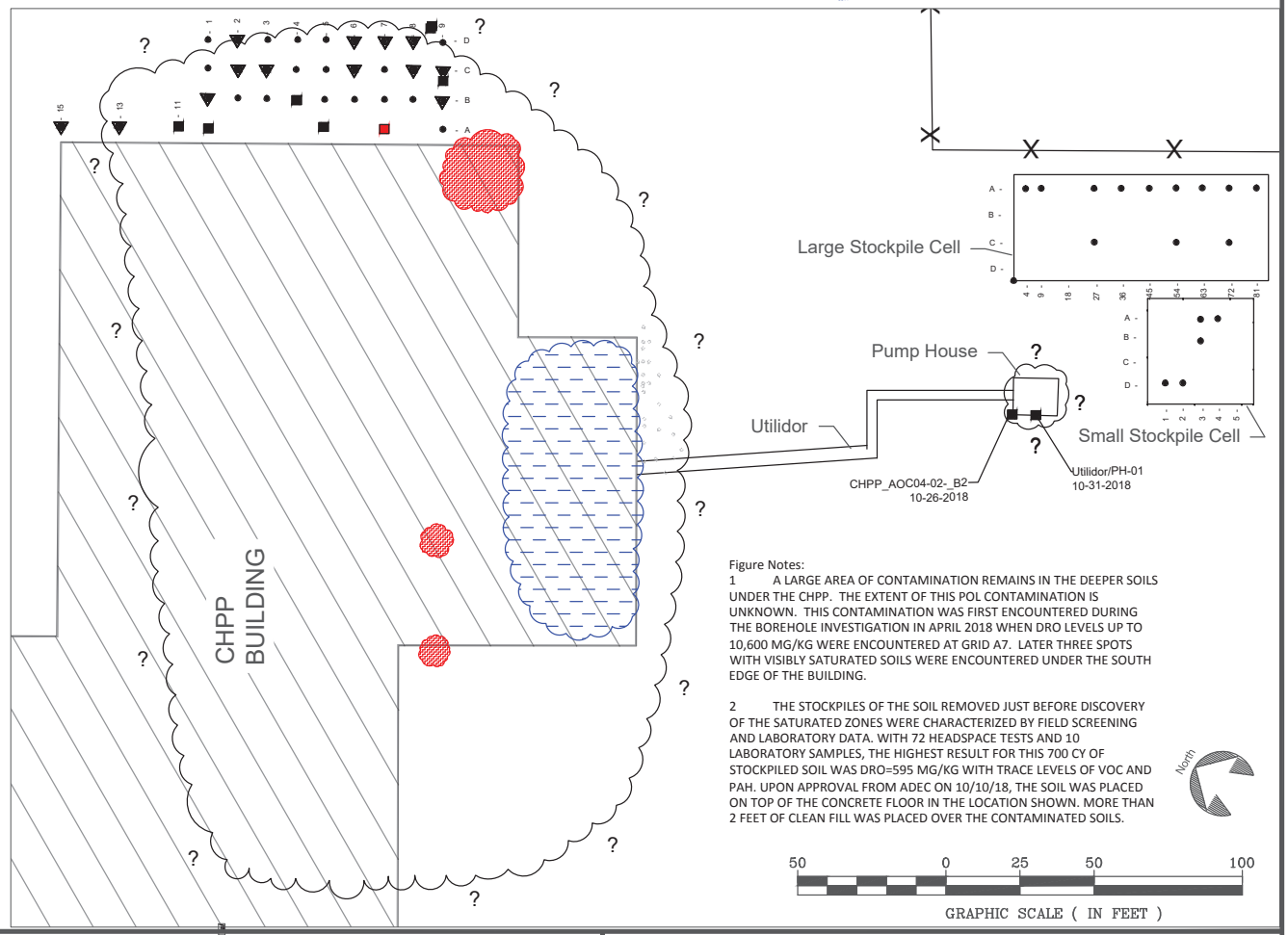


Figure Notes:

1 A LARGE AREA OF CONTAMINATION REMAINS IN THE DEEPER SOILS UNDER THE CHPP. THE EXTENT OF THIS POL CONTAMINATION IS UNKNOWN. THIS CONTAMINATION WAS FIRST ENCOUNTERED DURING THE BOREHOLE INVESTIGATION IN APRIL 2018 WHEN DRO LEVELS UP TO 10,600 MG/KG WERE ENCOUNTERED AT GRID A7. LATER THREE SPOTS WITH VISIBLY SATURATED SOILS WERE ENCOUNTERED UNDER THE SOUTH EDGE OF THE BUILDING.

2 THE STOCKPILES OF THE SOIL REMOVED JUST BEFORE DISCOVERY OF THE SATURATED ZONES WERE CHARACTERIZED BY FIELD SCREENING AND LABORATORY DATA. WITH 72 HEADSPACE TESTS AND 10 LABORATORY SAMPLES, THE HIGHEST RESULT FOR THIS 700 CY OF STOCKPILED SOIL WAS DRO=595 MG/KG WITH TRACE LEVELS OF VOC AND PAH. UPON APPROVAL FROM ADEC ON 10/10/18, THE SOIL WAS PLACED ON TOP OF THE CONCRETE FLOOR IN THE LOCATION SHOWN. MORE THAN 2 FEET OF CLEAN FILL WAS PLACED OVER THE CONTAMINATED SOILS.

FIGURE 2

PREPARED: HJD
DRAWN: HJD
REVIEWED: LAH
DATE: 12/12/18

EMI Consulting, Engineering & Training

JBER CHPP DEMO
ANCHORAGE, AK

KNOWN CONTAMINATED SOILS REMAINING & SAMPLE LOCATIONS FOR POL SOIL REMAINING ON SITE

JBER Richardson P8046 CHPP Demo Below Grade Concrete Structures Remaining in Place

Date: 12/9/2019

concreteStructureSegment

- 1'high Wall + Stemwall + Footing
- 3'high Wall + Stemwall + Footing
- Ash Conveyor Pipe Wall + Slab
- Basement Wall + Subbasement Wall & Slab + Stemwall + Footing
- Coal Elevator Wall + Slab+ Foundation
- Condensate Tank Wall + Stemwall + Footing
- Stemwall + Footing
- Subbasement Wall + Slab+ Foundation
- Trench Wall + Slab

concreteSructurePolygon

- Boiler Footing
- Boiler Pilaster Stemwall
- Column Footing
- Column Pilaster Stemwall
- Column Pilaster Stemwall+Wall Footings

N

1 inch = 25 feet
1:300

Projection & Datum:
Universal Transverse Mercator
Zone 6N, Datum: WGS 1984