

# STATE OF ALASKA

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

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611 CES/CEAR  
ATTN: Steve Hunt  
10471 20<sup>th</sup> Street, Suite 348  
Elmendorf AFB AK 99506-2200

Re: ADEC Determination of Final Compliance for Driftwood Bay  
Radio Relay Station (RRS) Sites

Dear Mr. Hunt:

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program has completed its review of 611 CES' written request (dated September 24, 2009) for determination of final compliance for 13 sites addressed in the Final Site Characterization Report - Driftwood Bay Radio Relay Station, September 2009. These sites had petroleum compounds as contaminants of potential concern and did not have CERCLA hazardous substance contamination, thus the sites are being addressed under the Alaska site cleanup rules found in 18 AAC 75.

One site (SS007 – Tank Farm) is recommended for Monitored Natural Attenuation with Institutional controls (ICs). The site is a former fuel tank farm with residual DRO contamination in soil and groundwater. Groundwater at the site is shallow and is not a current or likely future drinking water source and it discharges into the adjacent Snuffy Creek and Driftwood Bay. Sampling and field observations did not identify any adverse impacts to the surface waters. ICs are proposed to document the location of residual contamination and that the groundwater should not be used as a drinking water source. Monitored Natural Attenuation is proposed to document whether DRO plume in groundwater is shrinking and the concentrations are decreasing.

Three sites (OT001 – USTs and Antennas, SS010 – Water Supply Pump House, and WP003 – Waste Pit) are recommended for cleanup complete with Institutional Controls (ICs). ICs are proposed on these three sites for the following reasons: 1) document the location and extent of residual contamination, 2) limit land use solely to very limited/remote recreational use (as outlined in the risk assessment), and 3) to document the need to properly manage residual contamination in accordance with applicable regulations.

The remaining sites were characterized and determined to meet applicable cleanup levels and are proposed for no further action – cleanup complete. The Heavy Equipment Storage Area

had alternative migration to groundwater soil cleanup levels of 1.6 mg/kg pentachlorophenol and 8,000 mg/kg DRO. Site SS008 – Pipeline had an alternative soil cleanup level of 8,300 mg/kg DRO, based on migration to groundwater. SS004 – Drum Storage Area had an alternative migration to groundwater soil cleanup level of 8,000 mg/kg DRO. These method three alternative cleanup levels were based on total organic carbon content of samples collected from the site and were approved by DEC. The rest of the sites (FL009-Spill/Leak No. 1 at the Septic Tank; SS004-Construction Camp; SS004-Wooden Storage Building; SS004-500 Gal AST; SS011-Spill/Leak No.3; and Quarry Area) were shown to meet the applicable method 2 soil cleanup levels and Table C groundwater cleanup levels, where applicable.

DEC concurs with the recommendations for each of the sites as described above. The sites that were proposed for Cleanup Complete will be updated accordingly in the DEC contaminated sites database.

Please continue to coordinate with us on development and implementation of the ICs for sites OT001, SS010, and SP003 and the work plan and ICs for site SS007. Once the ICs are in place for sites OT001, SS010 and SP003, the status of these sites will be changed to Cleanup Complete with ICs. After ICs are in place and the groundwater contaminant plume at SS007 is shown to be attenuating the status of that site will also be changed to Cleanup Complete with ICs.

Also, note that 18 AAC 75.325(i) requires a responsible person to obtain DEC approval before disposing of soil or groundwater from a site that is subject to the site cleanup rules or for which the department has issued a cleanup complete determination under 18 AAC 75.380(d)(1).

The decisions described above may be reviewed and revised, in accordance with 18 AAC 75.380(d)(2), if new information becomes available that indicates contaminants or wastes at the site may pose an unacceptable risk to human health or the environment.

I look forward to working with you in completing the necessary work at the Driftwood Bay site. Please contact me at 269-3053 or by e-mail at [curtis.dunkin@alaska.gov](mailto:curtis.dunkin@alaska.gov) if you have any questions regarding this letter.

Sincerely,



Curtis Dunkin  
Environmental Program Specialist

Cc: John Halverson, ADEC (via email)  
Marty Brewer, ADEC (via email)  
Stephen Witzmann, Jacobs  
Glen Verplanke, AFCEE