



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-6898

MAR 24 2004

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MAR 25 2004

Dept. of Environmental Conservation
SPAR Contaminated Sites - DOD

Programs and Project Management Division
Special Project Management Branch

Mr. John Halverson
Alaska Department of Environmental Conservation (ADEC)
555 Cordova Street
Anchorage, Alaska 99501

Dear Mr. Halverson:

Last year, The Alaska Department of Environmental Conservation requested the Alaska District review the status of the White Mountain National Guard Site (F10AK0270) with regards to the Formerly Used Defense Sites (FUDS) program. In 1992, an Inventory Project Report (INPR) was completed, designating the property as FUDS eligible. However, no projects were identified, resulting in a No Further Action (NOFA) designation with respect to Department of Defense responsibilities. This status currently is termed 'No Department of Defense Action Indicated' (NDAI).

The District has completed a review of the site information and recommends retaining the NDAI status. Therefore, a revision to the INPR has not been prepared. Enclosed is a copy of our internal memorandum dated February 23, 2004, summarizing review of the INPR and associated information.

Please review the enclosed memorandum by April 23, 2004. We want to assure that we have adequately addressed any concerns related to your request for review of this INPR. Should you have any questions or require additional information regarding the site, please contact me at (907) 753-5606.

Sincerely,

Richard Jackson
FUDS Project Manager

Enclosure

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MAR 25 2004

CEPOA-EN-EE-B

February 23, 2004

MEMORANDUM FOR CEPOA-PM-C

Dept. of Environmental Conservation
SPAR Contaminated Sites - DOD

SUBJECT: White Mountain National Guard Site (F10AK000270). Review of INPR and EPA Preliminary Assessment, and recommendation of no further action.

1. An Inventory Project Report (INPR) recommending No Further Action (NOFA) for the White Mountain National Guard Site was approved in September 1992.
2. The United States Environmental Protection Agency (EPA) performed a Preliminary Assessment in 1998 to address community concerns regarding approximately 1,000 drums reportedly abandoned by the military. The EPA collected eight surface soil samples near the drums. The samples were analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs). TPH was detected at a maximum concentration of 550 mg/Kg; no VOCs, PAHs, or PCBs were detected. The report stated that detected TPH concentrations were low enough such that the petroleum fractions regulated by the Alaska Department of Environmental Conservation (ADEC) may not be present at or above regulated concentrations; however, this could not be stated conclusively because TPH concentrations are not directly comparable with ADEC cleanup levels. The EPA Preliminary Assessment report recommended no further action (NOFA) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for the White Mountain National Guard Site.
3. No records have been found indicating that the drums were part of any military operation. The Alaska Army National Guard reported that the number of abandoned drums is too large to have been used for armory operations. Residents of White Mountain who attended a Bureau of Indian Affairs (BIA) school that operated in White Mountain from 1948 to 1955 reported that the drums contained fuel used at the BIA boarding school (Attachment 1).
4. Recommendations: The No Defense Action Indicated (NDAI) recommendation is appropriate for the former White Mountain National Guard Site. There is no evidence of significant soil contamination, there is no evidence that the drums present at the site were used by the military, and there is historical evidence collected from community residents that the drums were used by the Bureau of Indian Affairs (BIA) school.
5. If additional information becomes available in the future, the INPR may be reviewed again.
6. If you have any questions concerning the information in this memorandum, please contact Melissa Markell at (907) 753-5615.



Melissa L. Markell
Environmental Scientist

ATTACHMENT 1

PROPERTY HISTORY: The village of White Mountain granted a use permit for 0.44 acres of land to be used as a National Guard Site. The permit was approved by the Department of the Interior, Bureau of Indian Affairs (BIA) on 4 May 1959. A National Guard Armory was constructed in 1959, consisting of a prefabricated scout armory building. The site was used by the Alaska Army National Guard (ARNG) as an armory site for the White Mountain detachment of the 1st Scout Battalion, Alaska ARNG (USACE Alaska, 1992). The site was retransferred to the BIA on 26 January 1968 following relocation of the armory to Nulato, Alaska (letter dated 1 Feb 1968 from Morgan Wheeler, Chief, Real Estate Division) (FDE 8 Sep 1992). The site was subsequently conveyed to the White Mountain Native Corporation pursuant to the Alaska Native Claims Settlement Act of 18 December 1971. Current owner of the former site remains the White Mountain Native Corporation.

Conflicting accounts exist regarding the history and use of the armory building and site. The original INPR reported that the armory building was moved to Nulato in 1968 (USACE Alaska, 1987). Left behind on the armory site were approximately 1,000 55-gallon drums that were moved by the residents of White Mountain to a new site adjacent to the village so that the armory land could be developed (USACE Alaska, 1987). Ecology & Environment, Inc. (E&E) performed a site visit in October 1998 as part of a Preliminary Assessment (USEPA, 1999). The Trip Report stated that, following National Guard use, the armory building was used as a school dormitory; some residents believed that the building was eventually removed while others indicated that it had been renovated and expanded over time and may be in current use in the village (USEPA, 1999). Neither the National Guard armory building nor its original site could be located for inspection/investigation during the site visit (USEPA, 1999).

Although the armory building could not be found, the location of drums reportedly associated with the armory is known. A site visit to the drum area conducted 1 through 4 October 1985 revealed approximately 1,000 55-gallon drums, neatly stacked in a 2-acre area lightly forested with black spruce (USACE Alaska, 1987). The majority of the drums had embossed DOD ownership markings (1943 Quartermaster Corps [QMC] and Army Air Force 1943). Twenty percent (200) of the drums were inspected and found to be empty; based on this inspection, all the drums were assumed to be empty (USACE Alaska, 1987). The site visit conducted by E&E in 1998 found that the once neat drum stacks had fallen or been disturbed. Consequently, the site occupied approximately 4 acres and consisted of smaller stacks or piles, each typically with individual drums scattered loosely around (EPA, 1999).

There are conflicting accounts regarding the origin and use of drums currently located at the site. The White Mountain Native Corporation believes that the drums originated with and are the responsibility of the military. However, there is no evidence that the drums were part of any military operation and the number of drums is too large to have been used at the National Guard armory (USACE Alaska, 1992). This is supported by the ARNG: they claim that the site has not been used since 1959 (ADEC, 2001). Military records and accounts from residents of White Mountain indicate that the drums contained fuel used by the BIA regional school that operated in White Mountain from 1948 to 1955 (USACE 1987 and 1992). Mr. Howard Lincoln, a resident of White Mountain who graduated from the BIA boarding school in 1949, was interviewed in 1987 (Knight, 1987). Mr. Lincoln reported that there was no fuel storage tank at White Mountain, so fuel was brought in by barrels. Mr. Lincoln also reported that there was no DOD development at White Mountain except for the National Guard armory. Mr. Ken Shougukwruk,

Mayor of White Mountain in 1987, was also interviewed in 1987 (Knight, 1987). Mr. Shougukwruk also reported that the drums supplied fuel for the BIA boarding school.

The fuel drums for the BIA school facilities were delivered by DOD from 1942 to 1950 (USACE 1987 and 1992). Military support of the BIA school may have occurred as part of the Military Sea Transport Service (MSTS) Mona Lisa operation, which supplied fuel, food, and other supplies to remote sites in Alaska (Hanson, 2003).