THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

610 University Ave
Fairbanks, AK 99709-3643
Main: 907-451-2180
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www.dec.alaska.gov

File: 580.38.002

December 17, 2015

Certified Mail Return Receipt Requested
Article No. 7012 2210 0002 1216 1806

Bruce Loudermilk, Director
Bureau of Indian Affairs, Alaska Region
3601 C Street, Suite 1100
Anchorage, Alaska 99577

Re: U.S. Bureau of Indian Affairs as a Potentially Responsible Party at White Mountain BIA School, Alaska

Dear Mr. Loudermilk,

This letter concerns the responsibility of the U.S. Bureau of Indian Affairs (BIA) to address petroleum and hazardous substance contamination associated with improper disposal of drums containing fuel used at the BIA boarding school in the village of White Mountain, Alaska. Because BIA is documented as the past owner and operator of the school, BIA is identified to be financially responsible or liable under AS 46.03.822 (Strict Liability for the Release of Hazardous Substances) for the investigation and cleanup of any hazardous substance contamination that might be present.

On September 14, 2004, BIA was notified that is a potentially responsible party (PRP) with financial liability for contamination caused from improper disposal of drums used at the White Mountain former BIA boarding school and was provided with supporting documentation (see attached 2004 notification to BIA and 1999 Report). In brief, approximately one-thousand 55-gallon drums were located in a lightly forested area, approximately four acres in size. The 1999 Preliminary Assessment (PA) report describes the site and analytical results from eight soil samples. Minor petroleum contamination, up to 550 mg/kg of Total Petroleum Hydrocarbons (TPH), was found. One water sample was collected from the city water well and did not contain contaminants of concern. In 2001, Department of Environmental Conservation (DEC) requested that the U. S. Army Corps of Engineers (Corps) re-evaluate the site for eligibility under the Formerly Used Defense Site (FUDS) program. The Corps provided documentation indicating residents of White Mountain reported the drums contained fuel used at the BIA boarding school between 1948 and 1955 (see attached 2004 Corps FUDS determination).

Since the last communication with BIA, residents of White Mountain have disposed of all drums remaining at the site. In order for DEC to assign the site with a determination of "cleanup complete", two actions remain:

1. Take confirmatory soil samples from the area with greatest petroleum contamination, based on 1998 sampling;
2. Evaluate soil samples for remaining contaminants;
    a. If no contaminants are detected above applicable cleanup levels, DEC will issue a designation of "cleanup complete".
    b. If remaining contaminants are detected, remedial activity will be required.

DEC has determined that BIA must undertake these actions as the PRP for this site. Under Alaska Statute (AS) 46.03.822(a), strict liability attaches jointly and severally to entities that, *inter alia*:

- owned or controlled the hazardous substance at the time of the release or threatened release;
- owned or operated the facility from which there is a release, or a threatened release; or
- owned or operated the facility at which the hazardous substance was disposed of and from which there is a release, or a threatened release.[1]

Alaska Statutes require the State to recover all costs associated with cleanup at contaminated sites. In the event that the State assumes the lead role in site characterization, containment, or cleanup, AS 46.08.070(a) mandates the commissioner of DEC to seek recovery for the cost of the response actions. Recoverable costs include contracts to carry out the response actions; the direct costs to the State, such as oversight, legal consultation, and materials; and the indirect costs to the State, such as administration, interest, and overhead. *See* AS 46.03.760(d). Because DEC has determined that BIA is a PRP, DEC will begin billing you for the State's expenditures associated with the petroleum contamination at this former BIA school.

Please respond in writing within thirty days of the date of this letter addressing your responsible party status and intended actions with respect to this ongoing hazardous material release event. Any site investigation, cleanup action or a natural resource damage assessment at contaminated site must be coordinated with DEC and have DEC approval prior to any field activities.

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[1] Pursuant to the same statute, a responsible party pays "for damages, or the costs of response, containment, removal, or remedial action incurred by the state, a municipality, or a village . . . resulting from an unpermitted release of a hazardous substance, or, with respect to response costs, the substantial threat of an unpermitted release of a hazardous substance." AS 46.03.822(a).

Unlike the federal statute after which it is patterned, our strict liability statute defines "hazardous substance" to include petroleum-related products. *See* AS 46.03.826(5) and (7). The term "facility" includes a "building, structure, installation" and a "site or area at which a hazardous substance has been deposited, stored, disposed of, placed, or otherwise located," and thus would encompass a petroleum-contaminated village school site or tank farm. *See* 46.03.862(3)(A).

If you have any questions concerning this matter, please contact me at (907) 451-2181.

Sincerely,

Fred Vreeman
Environmental Program Manager

Attachments: 2004 letter to BIA; RE: White Mountain Drum Area
1999 PA Report
2004 Corps FUDS eligibility determination

cc: Mark Kahklen, BIA Regional Environmental Specialist, via email

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

555 Cordova Street
Anchorage, AK 99501-2617
PHONE: (907) 269-7545
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http://www.state.ak.us/dec/

File No. 580.38.002

September 14, 2004

Kristin K'eit
Environmental Scientist
Bureau of Indian Affairs
PO Box 25520
Juneau AK 99802

Subject: White Mountain Drum Area, Section 26, Township 9S, Range 24W, Kateel River Meridian, ADL 412330, DEC database RECKEY #19983201224081

Dear Ms. K'eit:

This letter is to advise you that the Alaska Department of Environmental Conservation (DEC) has received information that indicates improper disposal of drums has occurred at the above referenced location near the Village of White Mountain. The Bureau of Indian Affairs (BIA) may be legally and financially responsible for this matter.

In 1998, Ecology and Environment, under contract to the U. S. Environmental Protection Agency (EPA), conducted a Preliminary Assessment (PA) of the site in response to concern over the drums and potential contamination. Approximately one-thousand 55-gallon drums were located in a lightly forested area, approximately four acres in size. The PA report (copy attached) describes the site and analytical results from eight soil samples. Minor petroleum contamination, up to 550 mg/kg of Total Petroleum Hydrocarbons (TPH), was found. One water sample was collected from the city water well and did not contain contaminants of concern.

The PA report indicated that the Alaska Army National Guard (AKANG) White Mountain Armory was the likely source of the drums. The AKANG notified DEC in 2000 that it did not believe these drums were from its' operation and provided supporting documentation.

In 2001, DEC requested that the U. S. Army Corps of Engineers (Corps) re-evaluate the site for eligibility under the Formerly Used Defense Site (FUDS) program. In 1992, the Corps had determined the White Mountain National Guard or Federal Scout Armory Site did not contain hazardous substances, pollutants or contaminants eligible for cleanup under the FUDS program. Early this year, the Corps completed its' review and again determined there are no FUDS program eligible projects at the site. The Corps provided documentation indicating residents of White Mountain reported the drums contained fuel used at the BIA boarding school between 1948 and 1955 (see attachment 2).

Based on all the information available to DEC pertaining to this site, it appears BIA is responsible for the large number of drums that have been improperly disposed of at the site. The available data does not indicate any significant contaminant problem exists; however, remaining drums may contain residual fuel that could cause future releases. Additionally, the drums are solid waste and may pose a physical hazard to people and wildlife. Therefore, the department requests BIA inspect the site and properly cleanup and dispose of the drums.

If you have any questions regarding this letter, please feel free to call me at 269-7545, or Deb Caillouet at 269-0298.

Sincerely,

John Halverson
Section Manager
Federal Facilities Oversight

Attachments:

- 1998 PA Report by E&E
- 2004 USACE FUDS eligibility determination

cc: Deb Caillouet, DEC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

February 23, 1999

Reply To
Attn Of: ECL-115

Roy Ashenfelter, President
White Mountain Native Corporation
P.O. Box 81
White Mountain, Alaska 99784

Re: White Mountain National Guard Site Preliminary Assessment

Dear Mr. Ashenfelter:

The U.S. Environmental Protection Agency (EPA), through its contractor, Ecology & Environment, Inc., has completed the Preliminary Assessment of the White Mountain National Guard site. A copy of the report is enclosed.

Based on this Preliminary Assessment and other pertinent information, EPA does not anticipate further investigation under the Federal Superfund Program. However, you should be aware that this site may still be subject to compliance with any appropriate Alaska state regulations.

If you have any questions regarding this matter, you can contact me at (206) 553-1271.

Sincerely,

John Meyer
Site Assessment Manager

Enclosure

cc: Bob Chivvis U.S. Army Corps of Engineers
John Halverson, ADEC
Bill Janes, ADEC

TRIP REPORT

DATE: October 20, 1998

TO: John Meyer, Task Monitor, EPA, Mail Stop ECL-115

FROM: Len Marcus, Project Manager, E & E, Anchorage, AK

SUBJ: White Mountain National Guard Site

REF: TDD 97-02-0010

Place Visited:

White Mountain National Guard Site
White Mountain, Alaska 99784
Latitude/Longitude: 64°41' N 163°24' W
Legal Description: Section 26, Township 9 South, Range 24 West, Kateel River Meridian

Purpose of Trip:

The purpose of the trip was to conduct a Preliminary Assessment (PA) of the White Mountain National Guard site to determine the potential threat to public health or the environment posed by the site, the potential release of hazardous substances from the site, and potential placement of the site on the National Priorities List.

Persons Responding:

Len Marcus, Project Manager
Tim Mayers
E & E, Anchorage, Alaska (907) 257-5000

Site Owners:

White Mountain Native Corporation
P.O. Box 81
White Mountain, Alaska 99784
(907) 638-3651

Persons Contacted:

Roy Ashenfelter, President
White Mountain Native Corporation
P.O. Box 81
White Mountain, Alaska 99784
(907) 638-3651

Following National Guard use, the armory building reportedly was used as a school dormitory. There are conflicting reports regarding the building's eventual status, with some residents believing that the building was removed and others indicating that it had been renovated and expanded over time and may be in current use in the city. Hazardous substance usage at the armory likely included heating oil or fuel for building heating purposes, but building maintenance or armory activities may have involved the use of other hazardous materials.

The White Mountain National Guard site was identified as a potential Defense Environmental Restoration Program (DERP) project through USAED Alaska property holding records (USAED Alaska 1992). The site was listed because approximately 1,000 empty drums were found in White Mountain (see Figure 2). USAED Alaska investigated the White Mountain National Guard site in 1985 and 1986. During a 1986 site visit, USAED Alaska inspected the estimated 1,000 drums and collected two composite soil samples at the drum site (USAED Alaska 1987). The only contaminants detected were polynuclear aromatics (PNAs) at 3 parts per million. Approximately 20% of the drums (200) were checked and determined to be empty. Based on the checked drums and background information, all drums were assumed empty.

The drums, noted to bear military markings, first were thought to have been used by the military in White Mountain. However, according to USAED Alaska documents, the drums eventually were attributed to the BIA regional school that operated in White Mountain from 1948 to 1955 (USAED Alaska 1992). A USAED Alaska document states that fuel in drums for the BIA school and National Guard armory was delivered by the United States Department of Defense (DOD) from 1942 to 1950 (USAED Alaska 1987). While noting that the drums originally may have been produced by or for the military, the USAED Alaska documents mention that there is no evidence of military usage of the drums and acknowledge that National Guard activities could not have produced such a large number of drums. As the drums were used at the BIA school, they were moved empty to their present location. Because the BIA school was apparently the owner and generator of the drums, USAED Alaska concluded that there was no hazardous or toxic waste, ordnance, or unsafe debris at the site as a result of DOD activities and that the site did not qualify for cleanup or restoration under DERP (USAED Alaska 1992). Based on USAED file information, all of the drums at the site are believed to have contained fuel.

START ACTIONS

The START performed a site visit as part of a PA on August 12, 1998. Based on USAED Alaska file information, the PA focused on investigating the drum site. Before the site visit, the START reviewed USAED Alaska files and aerial photographs of the site. Access to the site was granted by Mr. Roy Ashenfelter, president of White Mountain Native Corporation (the landowner in White Mountain). The START met with city and Native council representatives while in White Mountain (see Persons Contacted section). Photo documentation of the START site visit is provided as Attachment A.

The START viewed the drum site. The approximately 1,000 55-gallon drums are located in multiple groups within an approximately 4-acre, lightly forested area. All of the drums are above ground, and no signs of buried drums were noted. The drum area is on the northeast edge of the city, approximately 800 feet from the Fish River (see Figure 2). The terrain of the drum area slopes gently southward toward the city. An all-terrain vehicle dirt road runs through the drum area, with approximately 25% of the drums on the west side of the road and the rest on the east side (see Figure 3). USAED Alaska file photographs and historic aerial photographs indicate that the drums originally existed in neat stacks at this location (AeroMap 1972). Over the years, the stacks have fallen or have been disturbed; as a result, the site now consists of smaller stacks or piles each typically with individual drums scattered loosely around. No other signs of hazardous substance sources or contamination were noted in the drum site vicinity.

total coliform bacteria monthly, VOCs annually, lead and copper every three years, and other organic and inorganic parameters on a varying basis. The same two VOCs detected in the START sample have been detected in annual VOC testing of treated water for at least the past two years, and at concentrations very similar to those found by START (Johnson 1998). Upon inquiring further into the water treatment plant design, START learned that backdraining of treated water in the system's piping could pass to a check valve or flow restrictor device located before the "pretreatment" valve from which the START obtained a sample, essentially allowing treated water (or a mixture of treated and untreated water) to occur at that valve. In a follow-up telephone call, the water plant operator noticed an apparent backdrain prevention device in-line before the valve that the START obtained a sample from, thus making it likely that the presumed pretreatment sample obtained by the START actually was a treated water sample.

The START discussed the water sampling results with an ADEC Drinking Water and Wastewater Program representative who is familiar with compiling and reviewing water test data from White Mountain and other villages. The ADEC representative is aware of these compounds in the White Mountain drinking water, acknowledged that the detected compounds are known to be generated by the water chlorination process (or may be an artifact of saltwater presence in the groundwater), and reported that the detected concentrations are below a level of concern (Johnson 1998). ADEC reported that untreated water sample results were not available for comparison to the START sample results (Johnson 1998).

EPA drinking water maximum contaminant levels (MCLs) have not been established for the two detected VOCs. The twoVOCs are below a guidance threshold for total trihalomethanes (which includes the two detected compounds) followed by ADEC's Drinking Water and Waste Water Program (Johnson 1998).

CONCLUSION

Soil samples collected from the drum area revealed TPHs as the only detected contaminant. TPHs could be expected to be present if drum leakage had occurred, as the drums reportedly held fuels. However, no visual signs of spillage or contamination (soil discoloration, stressed vegetation, or evidence of leakage on the drums) was noted by the START. The detected concentrations are relatively low for a petroleum-impacted area; but could be considered representative of this type of contamination given the aged, degraded state of any spillage. Although not a conclusive indication, the detected TPHs concentrations are low enough such that the petroleum fractions regulated by the State of Alaska (gasoline range, diesel range, and residual range organics) may not be present at regulated concentrations (TPHs concentrations alone are not regulated). Certain organic matter (vegetation) can exhibit low concentrations of petroleum compounds under laboratory analysis, and this could be the source of the TPHs detections. No other sources of hazardous substance contamination or waste were noted in the drum area. Based on the PA results, EPA-regulated non-petroleum soil contamination does not appear to be present, although ADEC-regulated petroleum contamination possibly may be present.

Based on the PA findings, the drums are considered to be nonhazardous debris. If drum handling or removal occurs, however, any residual amounts of fuel in the drums may have to be treated as a hazardous material. Representatives of White Mountain have stated to the START their desire to have the empty drums removed. As there was no documented release of hazardous constituents contained in the site files and EPA-regulated contaminants were not detected under the PA at the drum site, it appears that no further action for the drums under the Comprehensive Environmental Response, Compensation and Liability Act is warranted at this time.

The actual National Guard armory building or property could not be located to be inspected or sampled. Although very limited, information regarding the armory building or property does not indicate

Table 1

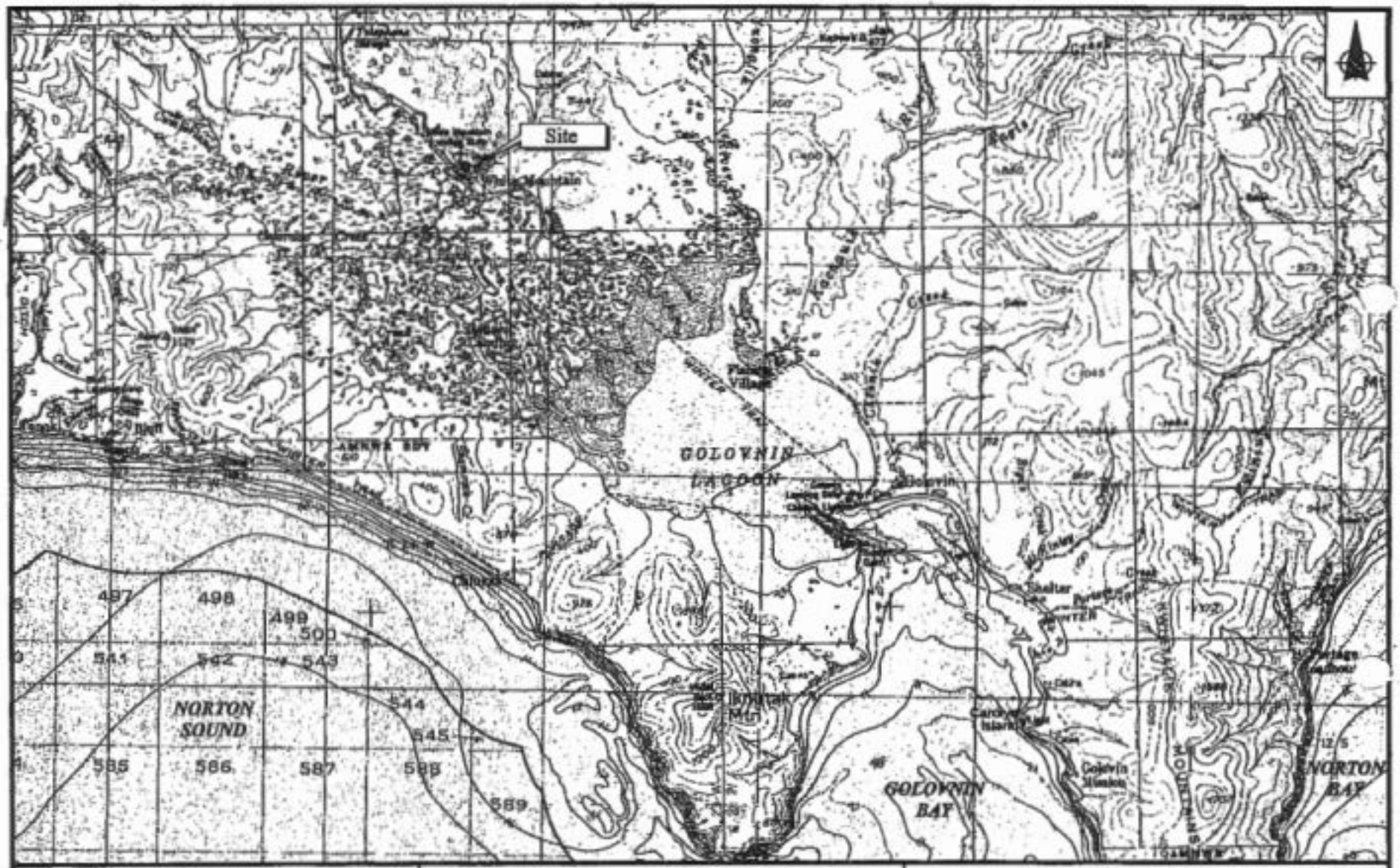
ANALYTICAL DATA SUMMARY
WHITE MOUNTAIN NATIONAL GUARD SITE
WHITE MOUNTAIN, ALASKA

Sample Location:	SS01	SS02	SS03	SS04	SS05	SS06	SS07	SS08	WA01
Description:	Surface Soil Near Drums	Surface Soil Near Drums	Surface Soil Near Drums	Surface Soil Near Drums	Surface Soil Near Drums	Surface Soil Near Drums	Surface Soil Near Drums	Surface Soil Near Drums	City's Well Water
Global Positioning System Coordinates:	N64° 41.010 W163° 24.601	N64° 41.029 W163° 24.595	N64° 41.003 W163° 24.521	N64° 41.021 W163° 24.573	N64° 40.995 W163° 24.528	N64° 41.020 W163° 24.544	N64° 40.996 W163° 24.554	N64° 40.993 W163° 24.551	No reading taken
Total Petroleum Hydrocarbons (mg/kg)	39 U	80	550	69	83 U	72	63	120	0.5 mg/L U
Volatile Organic Compounds (µg/kg)									
Bromoform	NA	NA	NA	NA	NA	NA	NA	NA	7 µg/L
Dibromochloromethane	NA	NA	NA	NA	NA	NA	NA	NA	4 µg/L
Polynuclear Aromatic Hydrocarbons (µg/kg)	ND	ND	ND	ND	ND	ND	ND	ND	ND
Polychlorinated Biphenyls (µg/kg)	ND	ND	ND	ND	ND	ND	ND	ND	ND

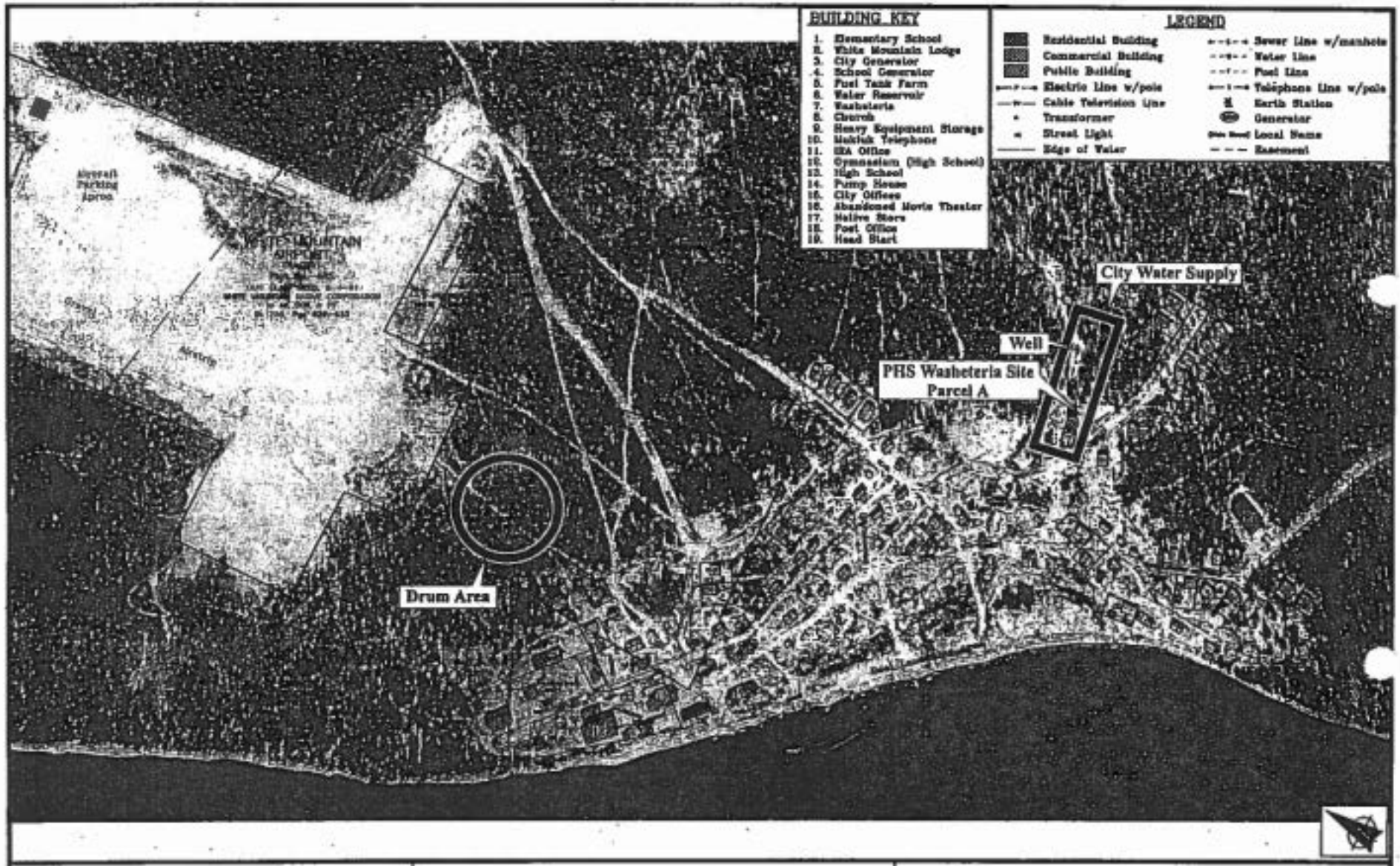
Note: The data have not been validated.
Bold entries = the analyte was detected.

Key:

µg/kg = Micrograms per kilogram.
µg/L = Micrograms per liter.
mg/kg = Milligrams per kilogram.
mg/L = Milligrams per liter.
NA = Not analyzed.
ND = Not detected.
SS = Surface soil.
U = The material was analyzed for but not detected. The associated numerical value is the sample quantitation limit.
WA = Water.



ecology and environment, inc. International Specialists in the Environment Anchorage, Alaska	WHITE MOUNTAIN NATIONAL GUARD White Mountain, Alaska	Figure 1 SITE LOCATION MAP			
	BASE MAP REFERENCE: USGS, Solomon, Alaska, 1985 0 2.5 5 Approximate Scale in Feet	Drawn: AES	Date 10/12/98	Job No. CG21SGSAT0	Dwg.No. CG21SGF4



ecology and environment, inc.
International Specialists in the Environment
Anchorage, Alaska

WHITE MOUNTAIN NATIONAL GUARD
White Mountain, Alaska

Figure 2
CITY MAP

BASE MAP REFERENCE:
White Mountain Community Map, 1996

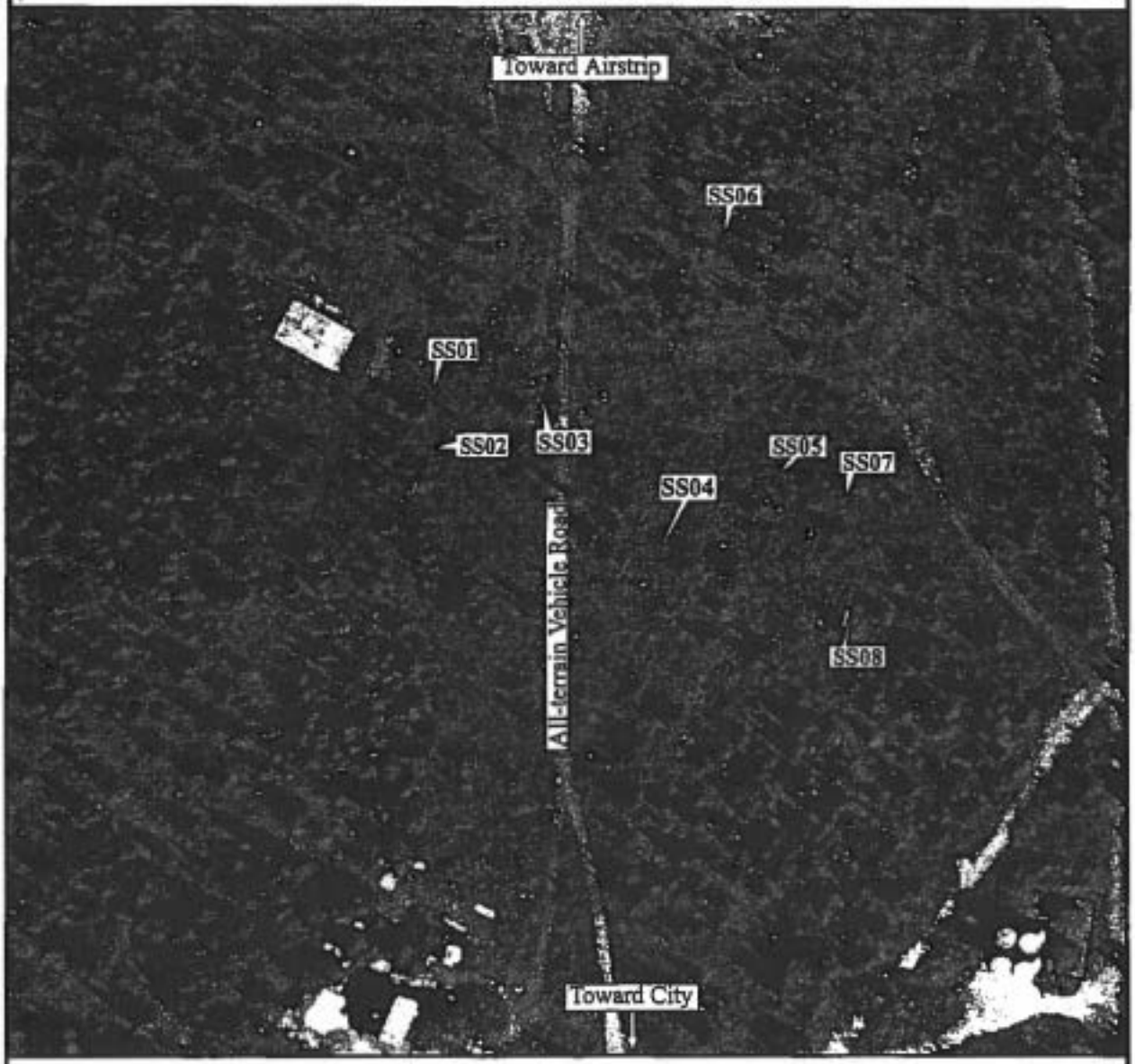
0 200 400
Approximate Scale in Feet

Drawn:	Date	Job No.	Dwg.No.
AES	10/9/98	CG21SGSAT0	CG21SGF6

Source: Aeromap U.S. Inc., 6-18-98

KEY:

SS05 Surface Soil Sampling Location



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International Specialists in the Environment
Anchorage, Alaska

WHITE MOUNTAIN
NATIONAL GUARD
White Mountain, Alaska

Figure 3
SAMPLE LOCATION MAP

0 65 130
Approximate Scale in Feet

Drawn:	DATE:	JOB NO.	Dwg.No.
AES	10/14/98	CG21SGSAT0	CG21SGF7

ATTACHMENT A

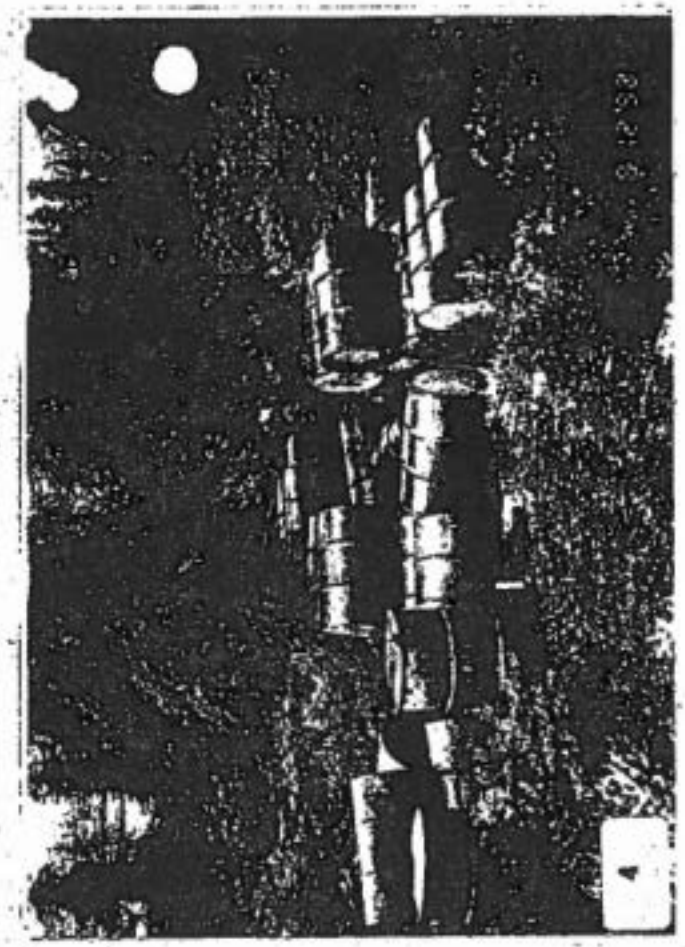
PHOTO DOCUMENTATION

PHOTOGRAPH IDENTIFICATION SHEET

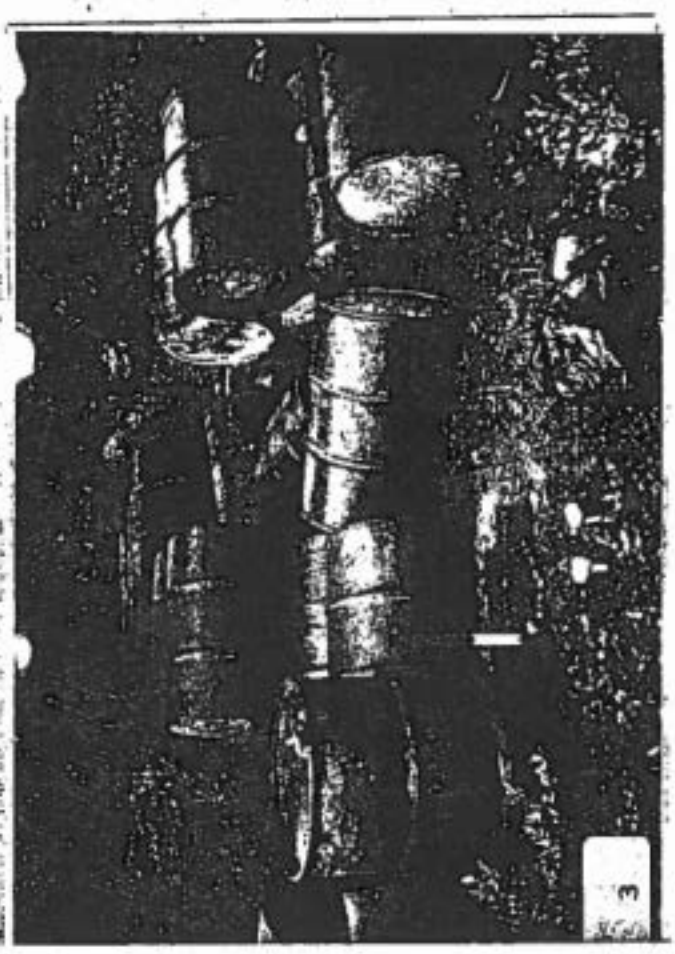
Camera Serial #: 52712087 **TDD #: 97-02-0010**
Lens Type: 38-140 mm **Site Name: White Mountain National Guard Site**

Photo No.	Date	Time	By	Description and Orientation
1	8-12-98	1207	LM	Sample SS01 location, facing west. Old pump house is in background.
2	8-12-98	1208	LM	Sample SS01 location, facing southwest.
3	8-12-98	1215	LM	Sample SS02 location, facing south.
4	8-12-98	1218	LM	Sample SS02 location, facing south.
5	8-12-98	1225	LM	Drum group from where sample SS03 was collected (at far left), facing south.
6	8-12-98	1228	LM	Drums in group from where sample SS03 was collected, facing west.
7	8-12-98	1230	LM	Sample SS03 location, facing west.
8	8-12-98	1235	LM	Sample SS04 material.
9	8-12-98	1240	LM	Markings on a drum near sample SS04 location.
10	8-12-98	1245	LM	Sample location SS04 (red stake at center), facing southwest.
11	8-12-98	1246	LM	Drums on east side of all-terrain vehicle road, facing north.
12	8-12-98	1247	LM	Sample SS05 being collected, facing north.
13	8-12-98	1255	LM	Sample SS05 location, facing west.
14	8-12-98	1259	LM	Collecting sample SS06, facing south.
15	8-12-98	1305	LM	Sample SS06 location, facing west.
16	8-12-98	1310	LM	Sample SS07 being collected.
17	8-12-98	1320	LM	Various drum groups, facing west.
18	8-12-98	1322	LM	Drum group from where sample SS07 was collected (on near side), facing west.
19	8-12-98	1323	LM	Sample location SS07, facing east.
20	8-12-98	1325	LM	Sample location SS08.
21	8-12-98	1337	LM	Drums scattered to north from sample location SS08, facing north.
22	8-12-98	1340	LM	Drums scattered to the north from near sample location SS08, facing north.
23	8-12-98	1345	LM	Drums scattered to north from sample location SS08, facing north.
24	8-12-98	1346	LM	Drums scattered to west from sample location SS08, facing west.
25	8-12-98	1350	LM	Drums on west side of the all-terrain vehicle road, facing northwest.

LM = Len Marcus, Ecology and Environment, Inc., Anchorage, Alaska



White Mountain National Guard PA (1 of 4)

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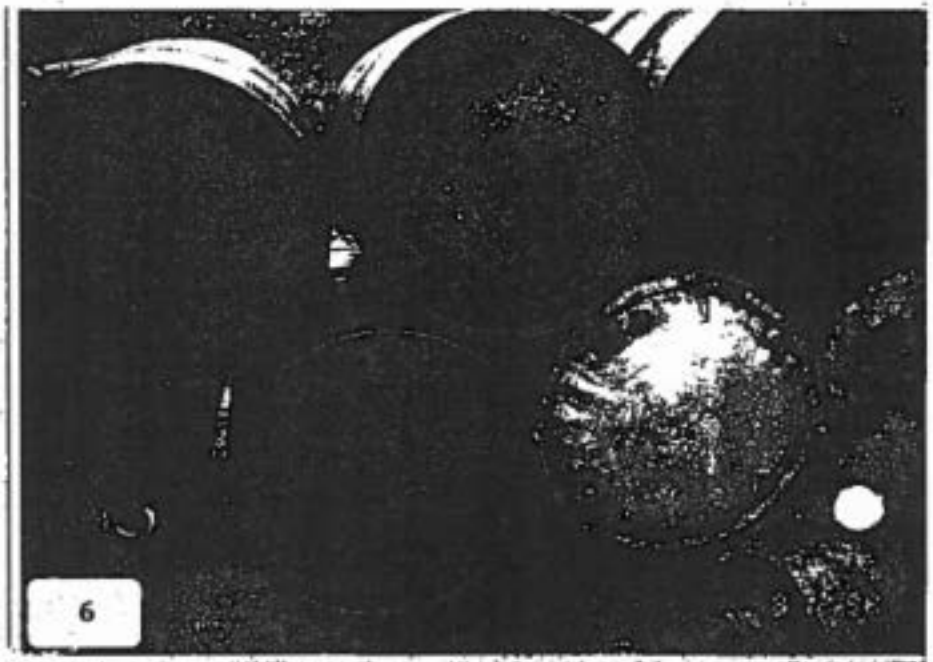
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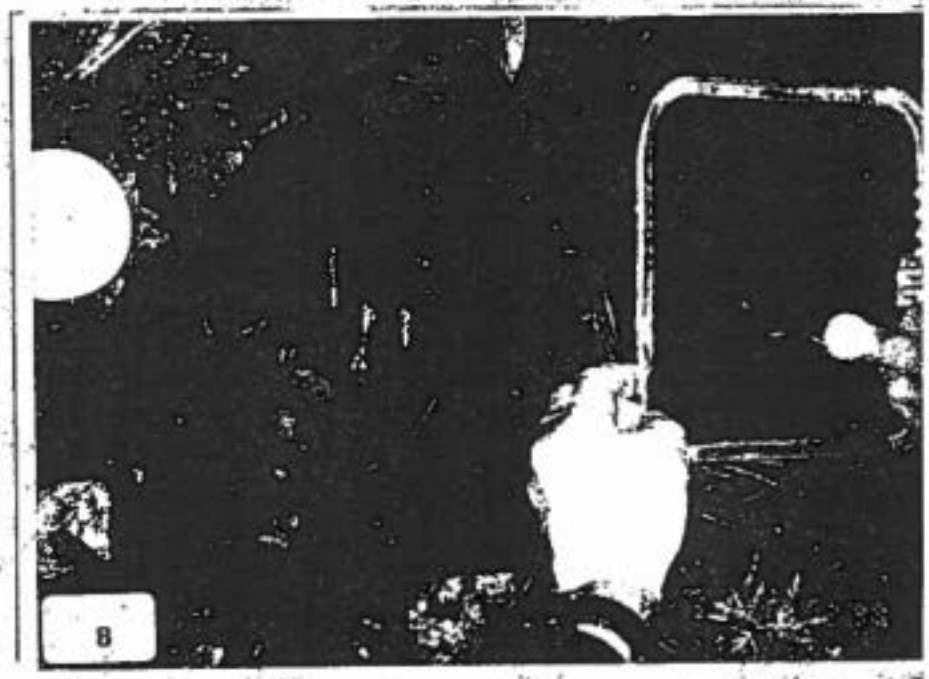
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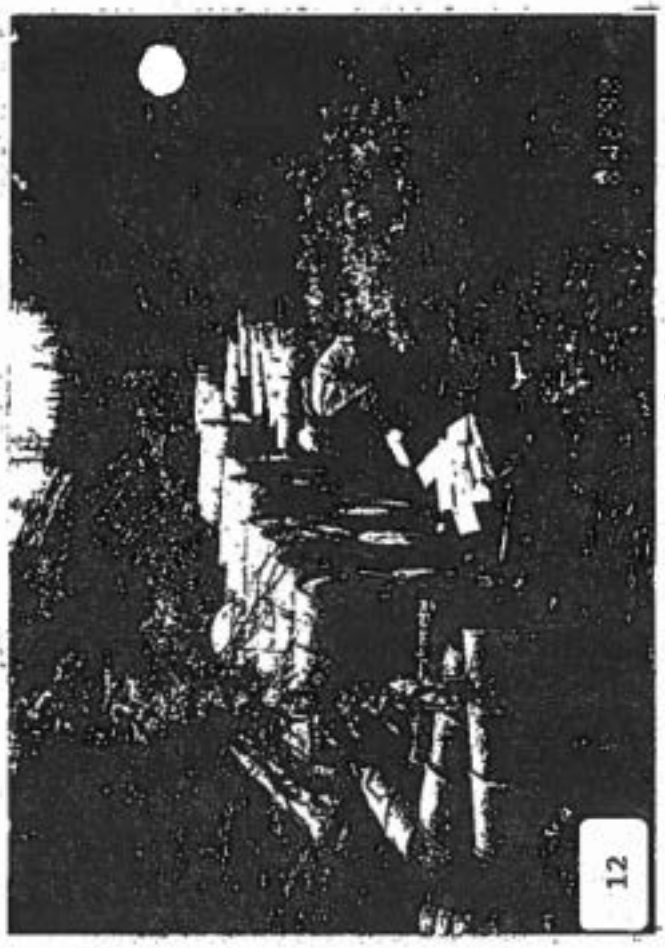
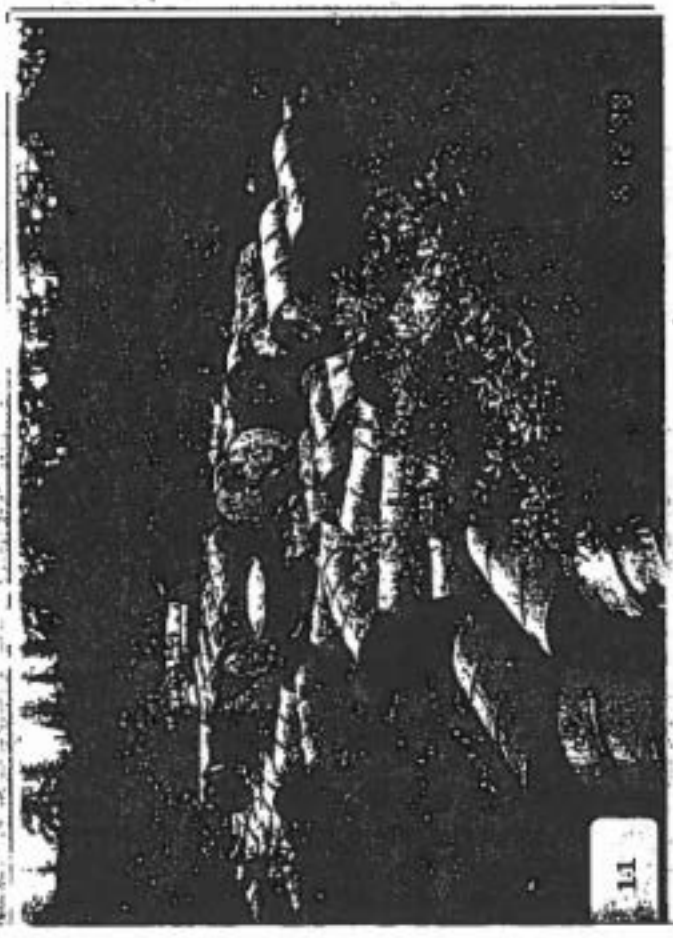
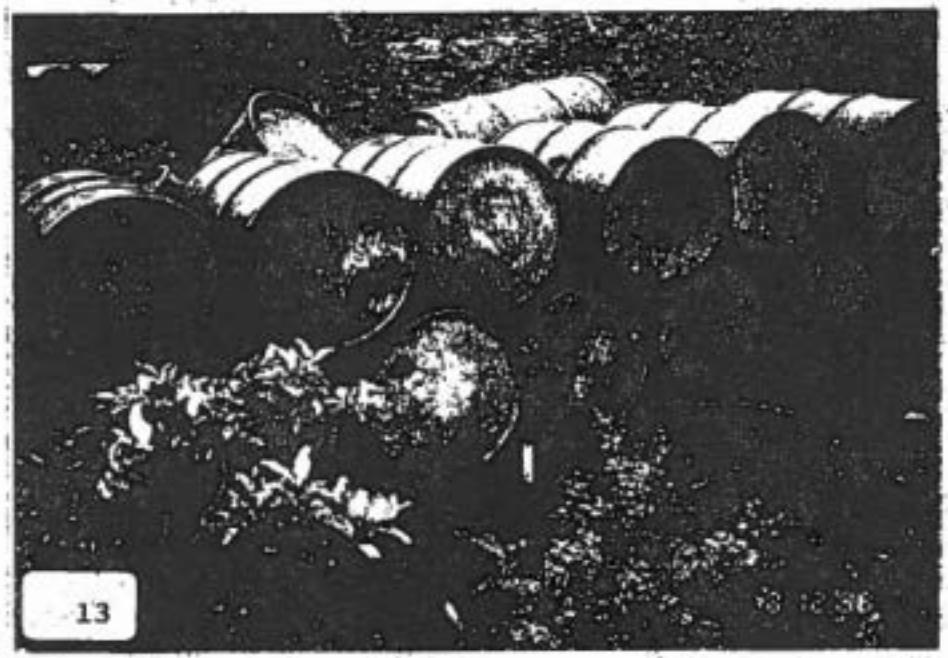


White Mountain National Guard PA (2 of 4)

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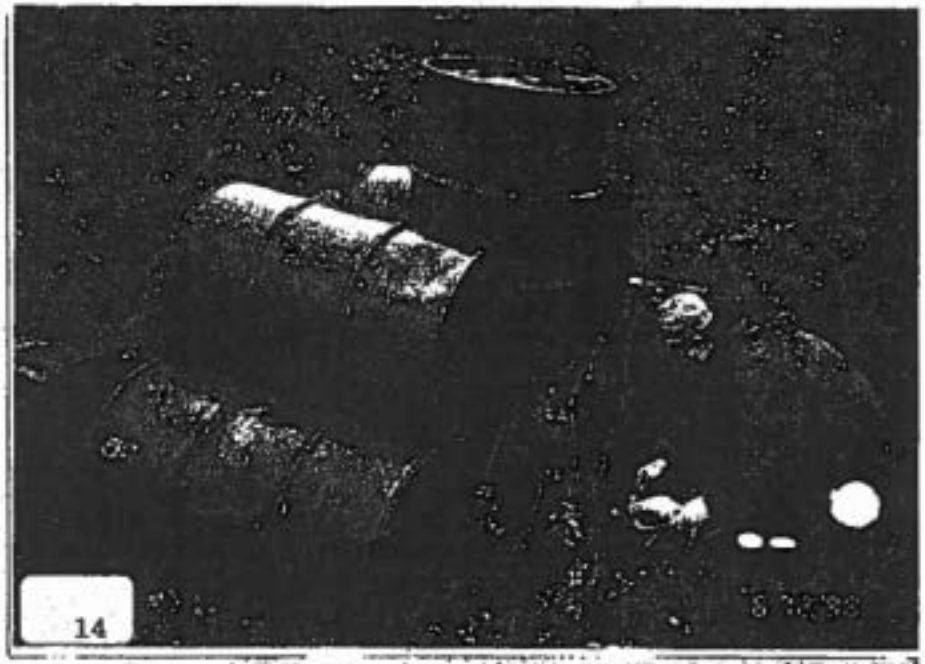
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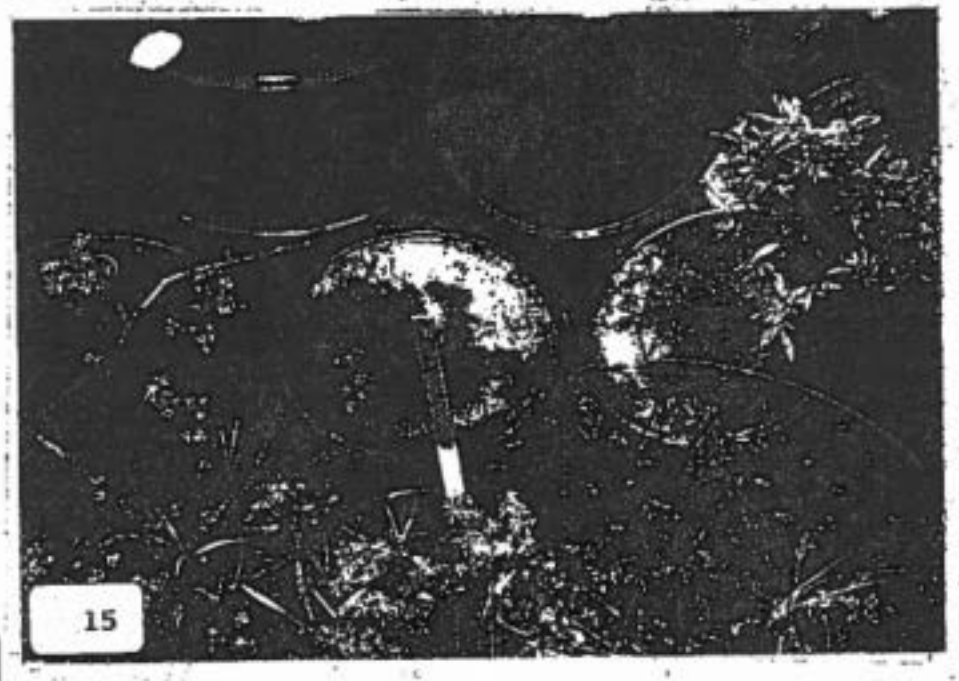
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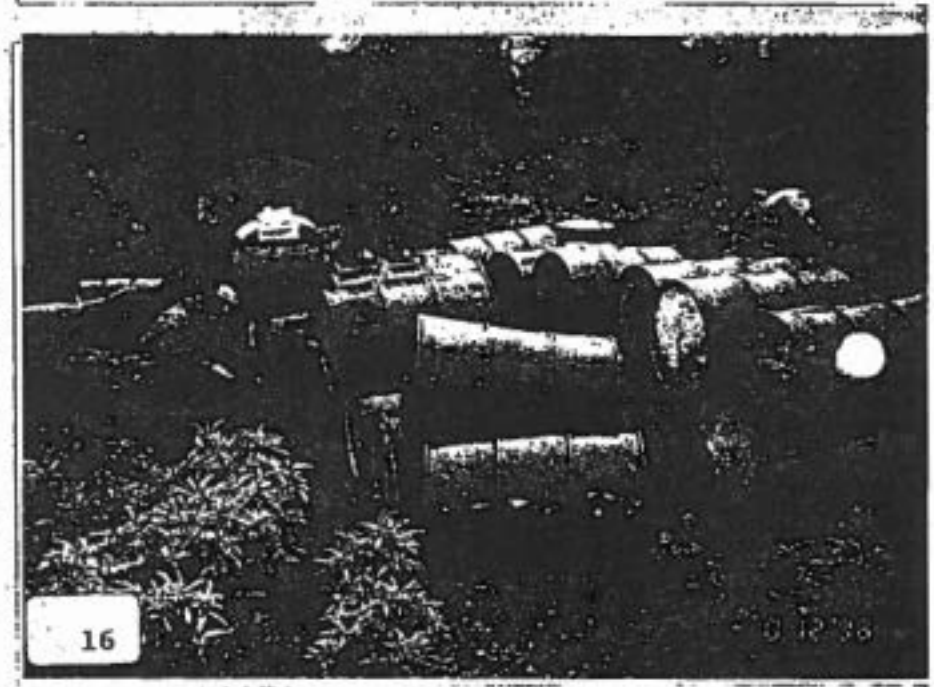
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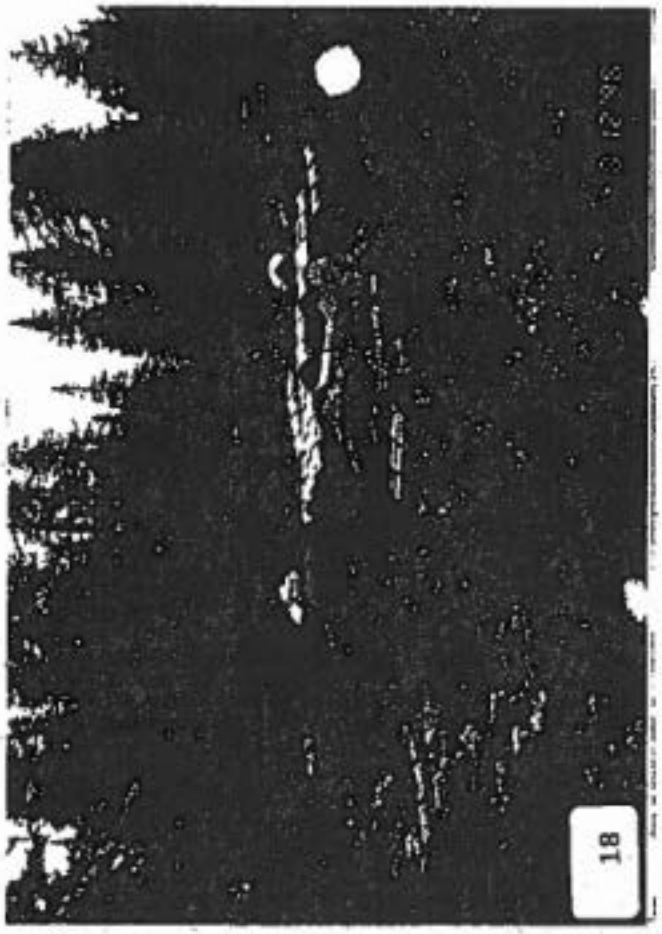
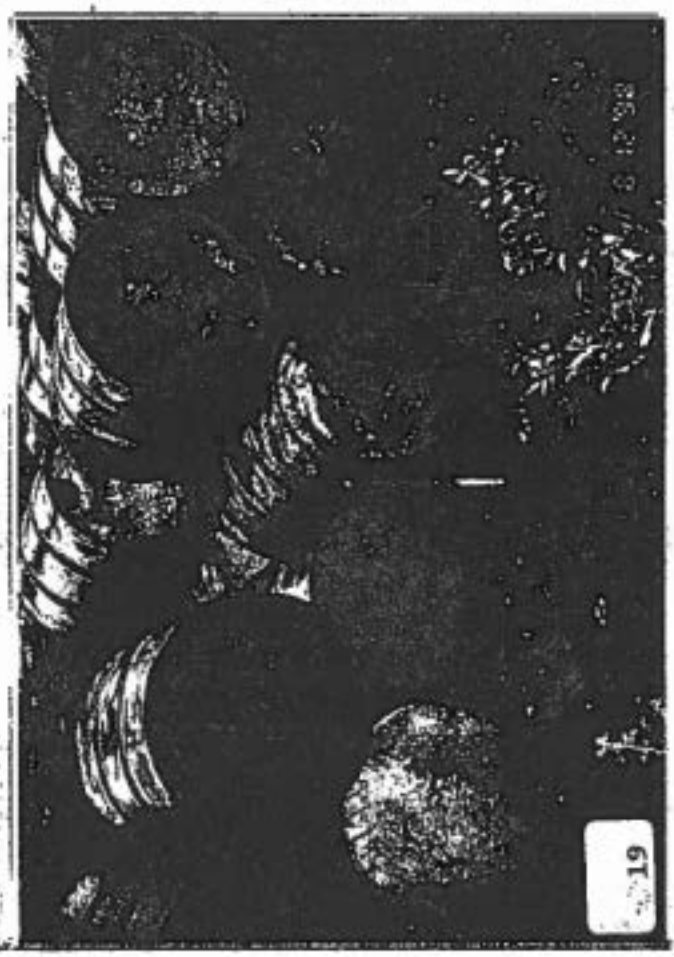


White Mountain NAtional Guard PA (3 of 4)

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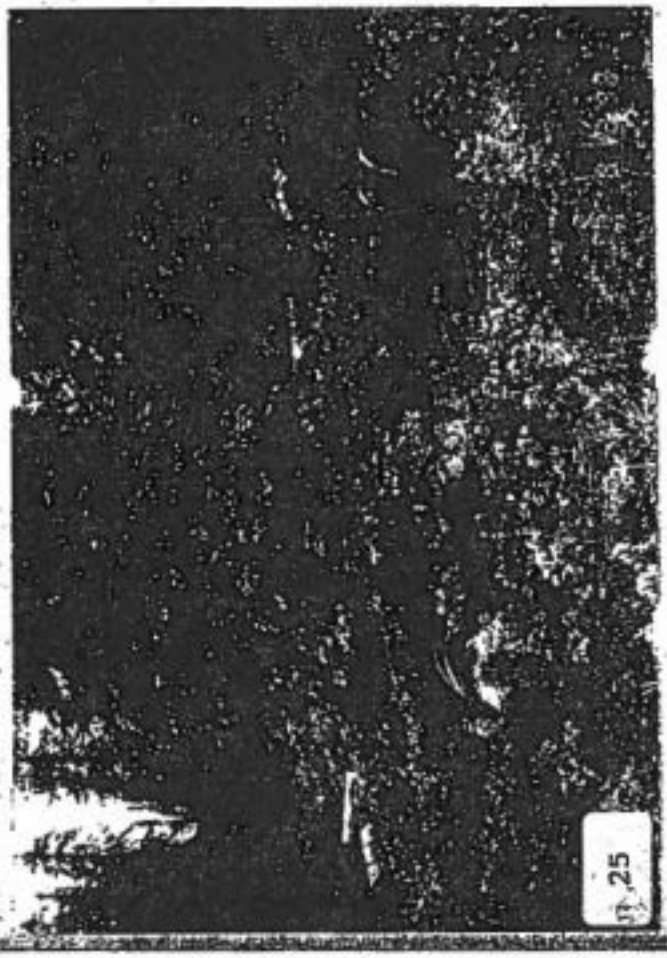
White Mountain National Guard PA (4 of 4)



ATTACHMENT B

LIST OF COMPOUNDS ANALYZED

Polynuclear Aromatic Hydrocarbons (PAHs)
2-Methylnaphthalene
Acenaphthene
Acenaphthylene
Anthracene
Benzo[a]anthracene
Benzo[a]pyrene
Benzo[b]fluoranthene
Benzo[g,h,i]perylene
Benzo[k]fluoranthene
Chrysene
Dibenz[a,h]anthracene
Fluoranthene
Fluorene
Indeno[1,2,3-cd]pyrene
Naphthalene
Phenanthrene
Pyrene

Polychlorinated Biphenyls (PCBs)
Aroclor 1016
Aroclor 1221
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260

Total Petroleum Hydrocarbons (TPHs)

Volatile Organic Compounds (VOCs)
Dichlorodifluoromethane
Chloromethane
Vinyl Chloride
Bromomethane
Chloroethane
Trichlorofluoromethane
1,1-dichloroethene
Methylene chloride
(trans)1,2-dichloroethene
1,1-dichloroethane
2,2-dichloropropane
(cis)1,2-dichloroethene
Chloroform
1,1,1-Trichloroethane
Carbon Tetrachloride
1,1-dichloropropene
Benzene

VOCs, continued
1,2-dichloroethane
Trichloroethene
1,2-dichloropropane
Dibromomethane
Bromodichloromethane
(cis)1,3-dichloropropene
Toluene
(trans)1,3-dichloropropene
1,1,2-Trichloroethane
Tetrachloroethene
1,3-dichloropropane
Dibromochloromenthane
1,2-dibromomethane
Chlorobenzene
1,1,1,2-Tetrachloroethane
Ethylbenzene
m,p-Xylene
o-Xylene
Styrene
Bromoform
Isopropylbenzene
Bromobenzene
1,1,2,2-Tetrachloroethane
1,2,3-Trichloropropane
n-propylbenzene
2-chlorotoluene
4-chlorotoluene
1,3,5-trimethylbenzene
tet-butylbenzene
1,2,4-trimethylbenzene
sec-butylbenzene
1,3-dichlorobenzene
p-isopropyltoluene
1,4-dichlorobenzene
1,2-dichlorobenzene
n-butylbenzene
1,2-dibromo-3-chloropropane
1,2,4-trichlorobenzene
Hexachlorobutadiene
Napthalene
1,2,3-trichlorobenzene

ATTACHMENT C

LABORATORY ANALYTICAL DATA

1 WTPH-418.1

TOTAL PETROLEUM HYDROCARBONS ANALYSIS DATA SHEET

SAMPLE NO.
98080001

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075

Matrix: (soil/water) SOIL Lab Sample ID: 08-075-1

Sample wt/vol: 20.0 (g/mL) mL

Date Received: 8/14/98

% Moisture: 36 decanted: (Y/N): N Date Extracted: 8/17/98

Concentrated Extract Volume: 100 (mL) Date Analyzed: 8/18/98

Dilution Factor: 1.0

Compound	Concentration Units: (mg/L or mg/Kg) mg/Kg	Q
Total Petroluem Hydrocarbons	39	U

1 WTPH-418.1

TOTAL PETROLEUM HYDROCARBONS ANALYSIS DATA SHEET

SAMPLE NO.
98080003

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075

Matrix: (soil/water) SOIL Lab Sample ID: 08-075-3

Sample wt/vol: 20.0 (g/mL) mL

Date Received: 8/14/98

% Moisture: 50 decanted: (Y/N): N Date Extracted: 8/17/98

Concentrated Extract Volume: 100 (mL) Date Analyzed: 8/18/98

Dilution Factor: 1.0

Compound	Concentration Units: (mg/L or mg/Kg) mg/Kg	Q
Total Petroluem Hydrocarbons	550	

1 WTPH-418.1

TOTAL PETROLEUM HYDROCARBONS ANALYSIS DATA SHEET

SAMPLE NO. 98080005

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075

Matrix: (soil/water) SOIL Lab Sample ID: 08-075-5

Sample wt/vol: 20.0 (g/mL) mL

Date Received: 8/14/98

% Moisture: 70 decanted: (Y/N): N Date Extracted: 8/17/98

Concentrated Extract Volume: 100 (mL) Date Analyzed: 8/18/98

Dilution Factor: 1.0

Compound	Concentration Units: (mg/L or mg/Kg) mg/Kg	Q
Total Petroluem Hydrocarbons	83	U

000067

1 WTPH-418.1

TOTAL PETROLEUM HYDROCARBONS ANALYSIS DATA SHEET

SAMPLE NO.

98060007

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 06-075

Matrix: (soil/water) SOIL Lab Sample ID: 06-075-7

Sample wt/vol: 20.0 (g/mL) mL

Date Received: 8/14/98

% Moisture: 38 decanted: (Y/N): N Date Extracted: 8/17/98

Concentrated Extract Volume: 100 (mL) Date Analyzed: 8/18/98

Dilution Factor: 1.0

Compound	Concentration Units: (mg/L or mg/Kg) mg/Kg	Q
Total Petroleum Hydrocarbons	63	

000069

1 WTPH-418.1

TOTAL PETROLEUM HYDROCARBONS ANALYSIS DATA SHEET

SAMPLE NO.
98080009

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075

Matrix: (soil/water) SOIL Lab Sample ID: 08-075-9

Sample wt/vol: 1000.0 (g/mL) mL

Date Received: 8/14/98

% Moisture: n/a decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 100 (mL) Date Analyzed: 8/19/98

Dilution Factor: 1.0

Compound	Concentration Units: (mg/L or mg/Kg) mg/L	Q
Total Petroleum Hydrocarbons	0.5	U

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.
98080008V

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Site: _____ tion: _____ Group: OSE08-075

Matrix: (soil/water) WATER Lab Sample ID: 075-9

Sample wt/vol: 5.0 (g/mL) ML Lab File ID: 0817014.D

Level: (low/med) _____ Date Received: 8/10/98

% Moisture: not dec. _____ Date Analyzed: 8/17/98

GC Column: DB-624 _____ ID: 0.32 (mm) Dilution Factor: 1.0

Soil Extract Volume: _____ (uL) Soil Aliquot Volume: _____ (uL)

Concentration Units:
(ug/L or ug/Kg) ug/L

CAS No.	Compound		Q
	m,p-Xylene	2	U
95-47-6	o-Xylene	1	U
100-42-5	Styrene	1	U
75-25-2	Bromoform	7	
98-82-8	Isopropylbenzene	1	U
108-86-1	Bromobenzene	1	U
79-34-5	1,1,2,2-Tetrachloroethane	5	U
96-18-4	1,2,3-Trichloropropane	1	U
103-65-1	n-Propylbenzene	1	U
95-49-8	2-Chlorotoluene	1	U
106-46-7	4-Chlorotoluene	1	U
108-67-8	1,3,5-Trimethylbenzene	1	U
98-06-6	tert-Butylbenzene	1	U
95-63-6	1,2,4-Trimethylbenzene	1	U
135-98-8	sec-Butylbenzene	1	U
541-73-1	1,3-Dichlorobenzene	1	U
99-87-6	p-Isopropyltoluene	1	U
106-46-7	1,4-Dichlorobenzene	1	U
95-50-1	1,2-Dichlorobenzene	1	U
104-51-8	n-Butylbenzene	1	U
96-12-8	1,2-Dibromo-3-chloropropane	5	U
120-82-1	1,2,4-Trichlorobenzene	1	U
87-68-3	Hexachlorobutadiene	5	U
91-20-3	Naphthalene	5	U
87-61-6	1,2,3-Trichlorobenzene	1	U

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.
EE98080002

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Site: Location: Group: 07-075S

Matrix: (soil/water) SOIL Lab Sample ID: 075025

Sample wt/vol: 30.0 (g/mL) G Lab File ID: 0901010.D

Level: (low/med) MED Date Received: 8/14/98

% Moisture: 29 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 9/1/98

Injection Volume: 1.0 (uL) Dilution Factor: 1.0

GPC Cleanup: (Y/N) N pH:

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
91-20-3	Naphthalene	47	U
91-57-6	2-Methylnaphthalene	47	U
208-96-8	Acenaphthylene	47	U
83-32-9	Acenaphthene	47	U
86-73-7	Fluorene	47	U
85-01-8	Phenanthrene	47	U
120-12-7	Anthracene	47	U
206-44-0	Fluoranthene	47	U
129-00-0	Pyrene	47	U
56-55-3	Benzo[a]anthracene	47	U
218-01-9	Chrysene	47	U
205-99-2	Benzo[b]fluoranthene	47	U
207-08-9	Benzo[k]fluoranthene	47	U
50-32-8	Benzo[a]pyrene	47	U
193-39-5	Indeno(1,2,3-cd)pyrene	47	U
53-70-3	Dibenz[a,h]anthracene	47	U
191-24-2	Benzo[g,h,i]perylene	47	U

1B

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

EE98080004

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Site: Location: Group: 07-075S

Matrix: (soil/water) SOIL Lab Sample ID: 07504S

Sample wt/vol: 30.0 (g/mL) G Lab File ID: 0901012.D

Level: (low/med) MED Date Received: 8/14/98

% Moisture: 49 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 9/1/98

Injection Volume: 1.0 (uL) Dilution Factor: 3.0

GPC Cleanup: (Y/N) N pH:

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
91-20-3	Naphthalene	200	UD
91-57-6	2-Methylnaphthalene	200	UD
208-96-8	Acenaphthylene	200	UD
83-32-9	Acenaphthene	200	UD
86-73-7	Fluorene	200	UD
85-01-8	Phenanthrene	200	UD
120-12-7	Anthracene	200	UD
206-44-0	Fluoranthene	200	UD
129-00-0	Pyrene	200	UD
56-55-3	Benzo[a]anthracene	200	UD
218-01-9	Chrysene	200	UD
205-99-2	Benzo[b]fluoranthene	200	UD
207-08-9	Benzo[k]fluoranthene	200	UD
50-32-8	Benzo[a]pyrene	200	UD
193-39-5	Indeno[1,2,3-cd]pyrene	200	UD
53-70-3	Dibenz[a,h]anthracene	200	UD
191-24-2	Benzo[g,h,i]perylene	200	UD

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.
EE98080006

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Site: Location: Group: 07-075S

Matrix: (soil/water) SOIL Lab Sample ID: 07506S

Sample wt/vol: 30.0 (g/mL) G Lab File ID: 0901014.D

Level: (low/med) MED Date Received: 8/14/98

% Moisture: 56 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 9/1/98

Injection Volume: 1.0 (uL) Dilution Factor: 2.0

GPC Cleanup: (Y/N) N pH:

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
91-20-3	Naphthalene	150	UD
91-57-6	2-Methylnaphthalene	150	UD
208-96-8	Acenaphthylene	150	UD
83-32-9	Acenaphthene	150	UD
86-73-7	Fluorene	150	UD
85-01-8	Phenanthrene	150	UD
120-12-7	Anthracene	150	UD
206-44-0	Fluoranthene	150	UD
129-00-0	Pyrene	150	UD
56-55-3	Benzo[a]anthracene	150	UD
218-01-9	Chrysene	150	UD
205-99-2	Benzo[b]fluoranthene	150	UD
207-08-9	Benzo[k]fluoranthene	150	UD
50-32-8	Benzo[a]pyrene	150	UD
193-39-5	Indeno(1,2,3-cd)pyrene	150	UD
53-70-3	Dibenz[a,h]anthracene	150	UD
191-24-2	Benzo[g,h,i]perylene	150	UD

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.
EE98080008

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Site: Location: Group: 07-075S

Matrix: (soil/water) SOIL Lab Sample ID: 07508S

Sample wt/vol: 30.0 (g/mL) G Lab File ID: 0901016.D

Level: (low/med) MED Date Received: 8/14/98

% Moisture: 54 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 9/1/98

Injection Volume: 1.0 (uL) Dilution Factor: 2.0

GPC Cleanup: (Y/N) N pH:

CAS No.	Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
91-20-3	Naphthalene	140	UD
91-57-6	2-Methylnaphthalene	140	UD
208-96-8	Acenaphthylene	140	UD
83-32-9	Acenaphthene	140	UD
86-73-7	Fluorene	140	UD
85-01-8	Phenanthrene	140	UD
120-12-7	Anthracene	140	UD
206-44-0	Fluoranthene	140	UD
129-00-0	Pyrene	140	UD
56-55-3	Benzo[a]anthracene	140	UD
218-01-9	Chrysene	140	UD
205-99-2	Benzo[b]fluoranthene	140	UD
207-08-9	Benzo[k]fluoranthene	140	UD
50-32-8	Benzo[a]pyrene	140	UD
193-39-5	Indeno[1,2,3-cd]pyrene	140	UD
53-70-3	Dibenz[a,h]anthracene	140	UD
191-24-2	Benzo[g,h,i]perylene	140	UD

1 PCB

PCB ANALYSIS DATA SHEET

SAMPLE NO.

98080001

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075S

Matrix: (soil/water) SOIL Lab Sample ID: 07-075-01

Sample wt/vol: 20 (g/mL) g Lab File ID: 0822 032.D

Level: (low/med) LOW Date Received: 8/14/98

% Moisture: 36 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 20000 (uL) Date Analyzed: 8/22/98

Injection Volume: 1.0 (uL) Dilution Factor: 1.0

GPC Cleanup: (Y/N) N

Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
Aroclor 1016	78	U
Aroclor 1221	78	U
Aroclor 1232	78	U
Aroclor 1242	78	U
Aroclor 1248	78	U
Aroclor 1254	78	U
Aroclor 1260	78	U

000090

1 PCB

PCB ANALYSIS DATA SHEET

SAMPLE NO.

98080003

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075S

Matrix: (soil/water) SOIL Lab Sample ID: 07-075-03

Sample wt/vol: 20 (g/mL) g Lab File ID: 0822 036.D

Level: (low/med) LOW Date Received: 8/14/98

% Moisture: 50 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 20000 (uL) Date Analyzed: 8/22/98

Injection Volume: 1.0 (uL) Dilution Factor: 1.0

GPC Cleanup: (Y/N) N

Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
Aroclor 1016	100	U
Aroclor 1221	100	U
Aroclor 1232	100	U
Aroclor 1242	100	U
Aroclor 1248	100	U
Aroclor 1254	100	U
Aroclor 1260	100	U

000092

1 PCB
PCB ANALYSIS DATA SHEET

SAMPLE NO.
98080005

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075S

Matrix: (soil/water) SOIL Lab Sample ID: 07-075-05

Sample wt/vol: 20 (g/mL) g Lab File ID: 0822 038.D

Level: (low/med) LOW Date Received: 8/14/98

% Moisture: 70 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 20000 (uL) Date Analyzed: 8/22/98

Injection Volume: 1.0 (uL) Dilution Factor: 1.0

GPC Cleanup: (Y/N) N

Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
Aroclor 1016	170	U
Aroclor 1221	170	U
Aroclor 1232	170	U
Aroclor 1242	170	U
Aroclor 1248	170	U
Aroclor 1254	170	U
Aroclor 1260	170	U

000094

1 PCB

PCB ANALYSIS DATA SHEET

SAMPLE NO.

98080007

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-0755

Matrix: (soil/water) SOIL Lab Sample ID: 07-075-07

Sample wt/vol: 20 (g/mL) g Lab File ID: 0822 040.D

Level: (low/med) LOW Date Received: 8/14/98

% Moisture: 38 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 20000 (uL) Date Analyzed: 8/22/98

Injection Volume: 1.0 (uL) Dilution Factor: 1.0

GPC Cleanup: (Y/N) N

Compound	Concentration Units: (ug/L or ug/Kg) ug/Kg	Q
Aroclor 1016	81	U
Aroclor 1221	81	U
Aroclor 1232	81	U
Aroclor 1242	81	U
Aroclor 1248	81	U
Aroclor 1254	81	U
Aroclor 1260	81	U

000096

1 PCB

PCB ANALYSIS DATA SHEET

SAMPLE NO.

98080009

Lab Name: ONSITE ENVIRONMENTAL INC. Contract: E&E

Project No.: KJ0103 Group: 08-075W

Matrix: (soil/water) WATER Lab Sample ID: 07-075-09

Sample wt/vol: 1000 (g/mL) ml Lab File ID: 0822 042.D

Level: (low/med) LOW Date Received: 8/14/98

% Moisture: 0 decanted: (Y/N): N Date Extracted: 8/19/98

Concentrated Extract Volume: 1000 (uL) Date Analyzed: 8/22/98

Injection Volume: 1.0 (uL) Dilution Factor: 1.0

GPC Cleanup: (Y/N) N

Compound	Concentration Units: (ug/L or ug/Kg) ug/L	Q
Aroclor 1016	0.050	U
Aroclor 1221	0.050	U
Aroclor 1232	0.050	U
Aroclor 1242	0.050	U
Aroclor 1248	0.050	U
Aroclor 1254	0.050	U
Aroclor 1260	0.050	U

000098

580.58.002

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

REPLY TO ATTENTION OF:

MAR 24 2004

RECEIVED
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

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,

570.58.002

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

REPLY TO ATTENTION OF:

MAR 24 2004

RECEIVED
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

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Sincerely,

Richard Jackson
FUDS Project Manager

Enclosure

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,