

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

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File: 225.38.001

September 27, 2004

Alan D. Falkenstein
FAA Alaskan Region
222 W. 7th Avenue, Box 14
Anchorage, AK 99513-7587

Re: Federal Aviation Administration
Lake Minchumina – Buildings 400 (Flight Service Station) and 402 (MRL Building)
No Further Remedial Action Planned

Dear Mr. Falkenstein:

At the request of FAA environmental personnel, The Alaska Department of Environmental Conservation (DEC) has reviewed information and reports documenting remedial actions at the FAA Lake Minchumina Buildings 400 and 402.

Flight Service Station (FSS) Building 400

Building 400 was constructed in 1951 for FAA flight operations, and is now being remediated for future transfer to the Bureau of Land Management. Initial site investigation and remedial work was conducted by an Alaska Department of Transportation (DOT) contractor in 1989. This contractor identified a limited amount of petroleum staining in soil around older storage tanks. Four former Aboveground Storage Tanks (ASTs) used for fuel storage were removed, then the DOT contractor proceeded to excavate approximately 100 cubic yards of petroleum contaminated soil which was placed in a nearby borrow pit. Once the soil excavation reached 100 cubic yards, the DOT contractor halted all work and asked the FAA to take over cleanup. Unfortunately, DOT staff kept no records on this work, and although the FAA has made a good faith effort to obtain information, none can be found. The FAA proceeded on its own volition and has made excellent documented progress since.

Further excavation was impossible until demolition of the FSS was completed in this latest cleanup operation in 2001. The FAA contractor, Bristol Native Corporation International (BNCI), performed additional excavation within the building footprint and removed and stockpiled 185 cubic yards of soil to 16 feet below ground surface (bgs). Soil was excavated to bedrock, with confirmational sampling performed on the sidewalls and bottom of the excavation. Confirmational sampling of soil pockets on bedrock indicated that up to 589 ppm Diesel Range Organics (DRO)

remained. As much soil as physically possible was removed and the Department believes that this sample only indicates contamination remaining in small cracks within the bedrock and excavation has been completed to the best practicable extent. Overall, additional sidewall samples indicate the requested Method Two, Migration to Groundwater; Under 40 Inch Zone cleanup levels have been met.

Repeated attempts at sampling groundwater have not been successful. A 16' well to bedrock at the FSS has been dry. Additional nearby wells to 50' bgs and bedrock have also been dry. Since this area does not appear to contain productive groundwater, and source contamination was excavated to bedrock, the Department believes no further attempts at groundwater monitoring are needed in the FSS building area.

Highest Remaining Excavation Soil Concentrations, Bldg. 400*(parts per million, ppm)

GRO	DRO	Benzene	Toluene	Ethylbenzene	Xylenes	PAH
24	74.7	Non-Detect	Non-Detect	Non-Detect	1.64	Non-Detect

*treating the samples collected on bedrock as non-representative

Highest Remaining Stockpile Soil Concentrations, Bldg. 400 (ppm)

GRO	DRO	Benzene	Toluene	Ethylbenzene	Xylenes	PAH
320	5080	Non-Detect	Non-Detect	0.1	5.1	Below Table B1

Loop Radio Range (MRL) Building 402

Building 402 was constructed in 1942 and consisted of a residence with a hall, kitchen and living room. In 1993, petroleum soil contamination was noted at the building's heating oil tanks. Approximately 22 cubic yards of heating oil contaminated soil was excavated and placed in a nearby biocell. The biocell was converted to a landspread in 2001, and an additional 57 cubic yards of soil was removed and placed in the landspread. A second excavation in 2001 resulted in removal of an additional 30 cubic yards discovered under the foundation during building demolition. This soil was also stockpiled.

In 1993, the requested cleanup level for this site was Method One, Level D. All samples indicate this cleanup level has been achieved in the excavation. It should be noted that Polyaromatic Hydrocarbon (PAH) samples were never collected in this location; however, the Method One cleanup level does not require this, and it is unlikely PAHs would remain in excavations at these remaining concentration levels. Additionally, groundwater has never been indicated to be an issue in this area, and the Department views no need for groundwater monitoring.

Highest Remaining Excavation Soil Concentrations, Excavation 1, Bldg. 402 (ppm)

GRO	DRO	Benzene	Toluene	Ethylbenzene	Xylenes
Non-Detect	20.2	Non-Detect	Non-Detect	Non-Detect	Non-Detect

Highest Remaining Stockpile Soil Concentrations, Excavation 1, Bldg. 402 (ppm)

GRO	DRO	Benzene	Toluene	Ethylbenzene	Xylenes
5.1	224	Non-Detect	Non-Detect	Non-Detect	Non-Detect

Highest Remaining Excavation Soil Concentrations, Excavation 2, Bldg. 402 (ppm)

GRO	DRO	Benzene	Toluene	Ethylbenzene	Xylenes
15.2	28.4	Non-Detect	Non-Detect	Non-Detect	0.1558

Highest Remaining Stockpile Soil Concentrations, Excavation 2, Bldg. 402 (ppm)

GRO	DRO	Benzene	Toluene	Ethylbenzene	Xylenes
379	820	0.157	0.72	0.815	2.93

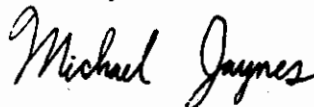
Determination

Both site excavations have achieved their respective cleanup levels. However, both stockpiles continue to have soil contamination above the requested levels. The Department will give these sites conditional closure with No Further Remedial Action Planned (NFRAP) status. Both sites will receive full closure once stockpiles and landsread soils are remediated. Stockpiled soil associated with Building 400 will need to achieve 1,000 ppm DRO, and soil associated with Building 402 will need to achieve 0.02 ppm Benzene in order to receive full closure. Once these soils are sampled and meet the required levels, the Department will grant full closure to each site.

In accordance with 18 AAC 75.380(d)(1), additional investigation and cleanup may be required if new information is discovered which leads DEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

If you are in disagreement with this decision you may seek an adjudicatory hearing under 18 AAC 15.200 – 18 AAC 15.920 within 30 days of the mailing of this decision. If you have any questions, please contact Mike Jaynes at (907) 465-5207 or via e-mail at Mike_Jaynes@dec.state.ak.us.

Sincerely,



Michael Jaynes
Environmental Specialist

cc: James Swalling, FAA

Jim Swalling/AAL/FAA
10/05/2004 02:04 PM

To Mike_Jaynes@dec.state.ak.us
cc
bcc
Subject MHM Bldgs 400 and 402 letter

Mike,

I have a few comments on the letter you sent regarding the contamination at former Buildings 400 and 402. You stated that the stockpile associated with Building 400 will need to achieve 1000 DRO. I was wondering why you put in 1000 DRO instead of the method 2 level.

The other three items are minor clarifications. There were 3 tanks at Building 400 not 4. The 57 cubic yards of soil removed from the location of the former heating oil tanks at Building 402 was placed in a stockpile, not in the landspread. The biocell was converted to a landspread in FY 96, not 2001.

Jim