



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 2548.38.001

December 28, 2022

Electronic Delivery Only

Aemon Wetmore
Federal Aviation Administration
222 West 7th Avenue, Box 14
Anchorage, AK 99513-7587

Subject: **Decision Document: No Further Action**
FAA Farewell Station- Runway 8 Drum Disposal Site and Former Drum Disposal Site

Dear Mr. Wetmore:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the FAA Farewell Station (Farewell Station) areas of concern (AOCs): Runway 8 Drum Disposal Site (Runway 8) and Former Drum Disposal Site (Drum Disposal). Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required unless information becomes available that indicates residual contaminants may pose an unacceptable risk. This determination is limited to the Runway 8 and Drum Disposal AOCs; the FAA Farewell Station site will remain active until cleanup is complete at all AOCs.

This No Further Action determination is based on the administrative record for the Runway 8 and Drum Disposal AOCs. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

FAA Farewell Station
MGrath, Alaska
62°30'21.8" N, 153°53'45.2" W

- Runway 8 Drum Disposal Site
- Former Drum Disposal Site

Name and Mailing Address of Contact Party:

Aemon Wetmore
Federal Aviation Administration
222 West 7th Avenue, Box 14
Anchorage, AK 99513-7587

DEC Site Identifiers:

File No.: 2548.38.001, Hazard ID 1873

Regulatory Authority for Determination:

18 AAC 75

Source Area IDs:

- Runway 8 Drum Disposal Site, ID 80716 (AOC 1)
- Former Drum Disposal Site, ID 80726 (AOC 3)

Site Description and Background

The former FAA Farewell Station is located approximately 160 miles northwest of Anchorage and 63.5 miles southeast of McGrath. The station became operational in 1942 but is no longer maintained by the FAA. The runway serves as an emergency landing site and receives widespread use during hunting season.

Runway 8 Drum Disposal Site

The Runway 8 AOC is located north of the runway and approximately 200 feet west of Building 600. In 1991, approximately 472 steel 55-gallon drums were identified at the Runway 8 site stacked in several rows and covered with soil. The drums contained fuel and fuel-contaminated water.

Former Drum Disposal Site (also referred to as Building 400 Drum Disposal Site)

The Drum Disposal AOC is located about 600 feet south of the former Flight Service Station (FSS) Facility. The AOC, first identified in 1991, consisted of approximately 23 drums, a concrete pad, and an inactive drum storage area to the south. Fifteen of the drums were empty and 8 of the drums were full of motor oil. While no visual evidence of contamination existed on the concrete pad, there was staining in the active drum storage area.

Contaminants of Concern

The following contaminants of concern (COCs) in soil have been identified:

- Diesel Range Organics (DRO)
- 1-methylnaphthalene
- Naphthalene

Cleanup Levels

The following 18 AAC 75 soil and groundwater cleanup levels apply at FAA Farewell:

- Table B1 and B2 Method Two Migration to Groundwater soil cleanup levels
- Table B1 Under 40-Inch Zone Human Health soil cleanup levels
- Table B2 Maximum Allowable Concentrations for soil
- Table C groundwater cleanup levels

Table 1 – Approved Cleanup Levels

Contaminant	Table B1/B2 Under 40 Inch Zone Migration to Groundwater (mg/kg)	Table B1/B2 Under 40 Inch Zone Human Health /Maximum Allowable Concentration (mg/kg)	Maximum Remaining Concentration Runway 8 (mg/kg)	Maximum Remaining Concentration Drum Disposal (mg/kg)
DRO	250	12,500	5,000	2,100
1-Methylnaphthalene	0.41	68 (230)	1.3	N/A
Naphthalene	0.038	29	0.0999J	N/A

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities

Runway 8 Drum Disposal Site

Prior to 1999, 472 steel 55-gallon drums containing fuel and fuel contaminated water were emptied, cleaned and rinsed, crushed and disposed of at a monofil on the FAA Farewell site. The contents were disposed of offsite, and the Runway 8 site was graded.

In 2018, the historical location of the site was targeted for investigation. The samples collected from soil borings were analyzed for DRO/Residual Range Organics (RRO), polycyclic aromatic hydrocarbons (PAHs), benzene, toluene, ethylbenzene, and total xylenes (BTEX) and extractable petroleum hydrocarbons/volatile petroleum hydrocarbons. The following compounds exceeded Table B1/B2 Migration to Groundwater cleanup levels but did not exceed the Human Health clean up levels in Table B1 or the maximum allowable concentration in Table B2: DRO (5,000 mg/kg), 1-methylnaphthalene (1.3 mg/kg), and naphthalene (0.0999 mg/kg).

Groundwater has not been encountered at the site during soil boring activities. The maximum depth of borings at this AOC was 20 feet below ground surface (bgs), contamination above CULs was detected between two and 10 feet, with a former drinking water well at the FAA Farewell site located at a depth of 330 feet bgs. Analytical soil results for DRO and 1-Methylnaphthalene were non detect, or were detected below cleanup levels, at 14 – 16 feet bgs, vertically delineating the contamination.

Former Drum Disposal Site (also referred to as Building 400 Drum Disposal Site)

During an Environmental Compliance Investigation conducted in 1991, one soil sample was collected beneath the Drum Disposal site. The sample indicated elevated total petroleum hydrocarbon concentrations.

In 2010 during a site investigation, soil and groundwater samples were collected and analyzed for BTEX, GRO, DRO, RRO, extractable petroleum hydrocarbons, volatile petroleum hydrocarbons, and PAHs. Maximum soil concentrations of DRO and RRO were 82,200 mg/kg and 174,000 mg/kg, respectively. These concentrations exceeded both the migration to ground water cleanup level and the maximum allowable concentrations in Table B2. To evaluate the migration of contaminants to groundwater, three groundwater monitoring wells (MW-1, MW-2, and MW-3) were installed and sampled for BTEX, GRO, DRO, RRO, PAH and volatile organic compounds (VOCs). Groundwater was encountered at approximately 14 feet bgs and the report suggests this was a perched aquifer as ground

water was not encountered at this shallow depth at any of the other AOCs at the Farewell Station. In addition, a former drinking water well was approximately 330 feet bgs. MW-1 had DRO concentrations detected at 64,800 µg/L and RRO was detected at 33,700 µg/L, both exceeding the groundwater cleanup levels in Table C. Results from MW-2 and MW-3 did not indicate contaminants above Table C cleanup levels. The results from MW-1 are considered to be an outlier in the data and not representative of the levels of contaminants in the groundwater based the results from MW-2 and M-3, and groundwater sampling in 2018.

In 2018, soil was excavated from four previous sample locations and confirmation samples collected from the limits of the excavation. The only analyte that exceeded Table B2 migration to groundwater cleanup levels was DRO at 2,100 mg/kg at the base of the excavation; DRO did not exceed the maximum allowable concentration in Table B2. MW-1, installed in 2010, was removed because it was in the middle of the soil excavation area, MW-2 had insufficient water to collect samples, and MW-3 was dry. Three temporary well points were advanced to approximately 28 feet bgs and analytical groundwater samples collected. No groundwater results exceeded the Table C cleanup levels. Based on the clean groundwater results from 2010 and 2018, DEC believes the remaining soil contamination poses minimal risk to the perched aquifer.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways. Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations at the Runway 8 Drum Disposal Site and the Former Drum Disposal Site meet the human health cumulative risk criteria for residential land use.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	De Minimis Exposure	Contamination remains in the sub-surface but is below levels that are protective of the direct contact pathway.
Inhalation – Outdoor Air	De Minimis Exposure	Contamination remains in the sub-surface but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	Soil gas data collected near the shop building confirmed that residual concentrations are below residential target levels.

Pathway	Result	Explanation
Groundwater Ingestion- Runway 8 Drum Disposal Site	Pathway Incomplete	Groundwater is found at depths greater than 250 feet and the pathway is incomplete.
Groundwater Ingestion- Former Drum Disposal Site	De Minimis Exposure	Contaminants in the perched aquifer do not exceed clean up levels and the pathway to the deep aquifer is incomplete.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	There are no concerns about other ecological pathways.

Notes to Table 2: “De Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination. “Pathway Incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors.

ADEC Decision

Soil contamination at the Runway 8 Drum Disposal Site and the Former Drum Disposal Site AOCs of the FAA Farewell Station has been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. The Runway 8 Drum Disposal Site and the Former Drum Disposal Site AOCs will receive “No Further Action” designations for soil contamination on the Contaminated Sites Database, subject to the following standard conditions. The FAA Farewell Station site will remain open until all areas of concern tracked under this file number have reached cleanup complete status.

Standard Conditions

1. Any proposal to transport soil or groundwater from a site that is subject to the site cleanup rules or for which a written determination from the department has been made under 18 AAC 75.380(d)(1) that allows contamination to remain at the site above method two soil cleanup levels or groundwater cleanup levels listed in Table C requires DEC approval in accordance with 18 AAC 75.325(i). A “site” as defined by 18 AAC 75.990 (115) means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

Informal Reviews and Adjudicatory Hearings

A person authorized under a provision of 18 AAC 15 may request an informal review of a contested decision by the Division Director in accordance with 18 AAC 15.185 and/or an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340. See DEC’s “Appeal a DEC Decision” web page <https://dec.alaska.gov/commish/review-guidance/> for access to the required forms and guidance on the appeal process. Please provide a courtesy copy of the adjudicatory hearing request in an electronic format to the parties required to be served under 18 AAC 15.200. Requests must be submitted no later than the deadline specified in 18 AAC 15.

If you have questions about this closure decision, please feel free to contact me at (907) 451-2881, or email at shonda.oderkirk@alaska.gov.

Sincerely,

Shonda Oderkirk

Shonda Oderkirk
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit
Bill O’Connell, ADEC
Nick Waldo, ADEC
Jamie McKellar, ADEC