



CUT AND COVER TANK TUNNEL SURFACE WATER TREND ANALYSIS, ROCKY POINT MANAGEMENT AREA, DUTCH HARBOR, UNALASKA, ALASKA FINAL

Date:	7 February 2023
Project:	Rocky Point Management Area Groundwater Monitoring ADEC File Number 2542.38.018
To:	Cascade Galasso-Irish, ADEC
Copy to:	Christina Bentz, Amanda Dotten, Eric Hetrick
From:	Jennifer Anderson
Attachments:	Attachment 1 – Figures Attachment 2 – Tables Attachment 3 – Trend Diagrams Attachment 4 – Response to Comments

This Technical Memorandum presents the findings of a trend analysis conducted on surface water samples collected from the Cut and Cover Tank Tunnels within the Rocky Point Management Area (RPMA) in Dutch Harbor, Unalaska, Alaska.

1. INTRODUCTION

This document was prepared by ARS Aleut Remediation, LLC (Aleut) to discuss trends that may be present in surface water accumulating in the Cut and Cover Tank Tunnels (tank tunnels) within the RPMA in Dutch Harbor, Unalaska, Alaska (Figure 1). The RPMA is located south of the Delta Western Fuel Dock on Amaknak Island. East Point Loop Road runs along the western edge of the site, and Dutch Harbor and Iliuliuk Bay border the site to the east (Figure 2). This area has been used as a bulk petroleum storage and distribution facility for more than 60 years and is currently operated by Delta Western LLC (Delta Western) under a lease from the Ounalashka Corporation.

There are currently five Cut and Cover Tank Tunnel Systems within the RPMA that are being regulated as aboveground storage tanks (ASTs) by the Alaska Department of Environmental Conservation (ADEC) under 18 Alaska Administrative Code (AAC) 75. Water accumulates in the heater pits and utility tunnels associated with the Cut and Cover Tank Tunnel Systems and has historically had detected concentrations of diesel range organics (DRO), residual range organics (RRO), and polycyclic aromatic hydrocarbons (PAHs). Weirs were constructed in each tank tunnel

to keep any light non-aqueous phase liquid (LNAPL) or floating product from flowing out of the tank tunnels if the water levels reached a level higher than the entrance of the tank tunnel.

Annual surface water samples are collected from the water present within the tank tunnels and analyzed for gasoline range organics (GRO); DRO; RRO; benzene, toluene, ethylbenzene, and xylenes (BTEX); and PAHs. Analytical results from surface water samples collected from within the tank tunnels are presented in an Annual Area-Wide Groundwater Monitoring and Operation and Maintenance Report.

Regular inspections of these weirs and water within the tank tunnels are conducted to ensure the weirs are functioning as intended and product is not migrating out of the Cut and Cover Tank Tunnel Systems through the tank tunnel openings. These inspections were conducted weekly until Delta Western submitted a request to ADEC in 2019 to reduce the frequency to monthly monitoring starting in January 2020. ADEC agreed with this request for a period of two years with the understanding that a trend analysis would be completed to determine the future frequency of these inspections. Findings of the tank tunnel and weir inspection activities are presented in an annual Cut and Cover Tank Tunnel Weir Inspection Summary Report.

This document presents a summary of the trend analysis conducted on specific analytes in the tank tunnel surface water to determine if monthly inspections are sufficient for monitoring surface water within the tank tunnels, or if a return to weekly inspections is warranted. Historical data was compiled from previous annual reports and trends were generated for select analytes.

2. TREND ANALYSIS ON CUT AND COVER TANK TUNNEL SURFACE WATER

The Mann-Kendall trend analysis is a non-parametric statistical method used to identify trends in analyte concentrations at discrete sampling locations over time. This analysis was performed on GRO, DRO, RRO, BTEX, and/or PAH analytical results that met the applicability threshold in Tank Tunnels 12, 13, 16, 17, and 18 (Tables 1A and 1B, Attachment 2). Overall, 23 analytes for each tank tunnel were consolidated and screened for a minimum of four detected, but not estimated results, as required for the method to provide statistically significant determinations. Data collected between 2004 and 2022 was used during this screening exercise. Table 2 in Attachment 2 presents the determination of method applicability for each analyte.

A Mann-Kendall trend analysis was run on those analytes determined to have sufficient data to provide a statistically significant determination. An EPA ProUCL software program was used to run the trend analysis for each of these analytes with a 95% confidence to determine if an increasing or decreasing trend is present. Table 3 in Attachment 2 presents the summarized

results of each trend analysis per tank tunnel for the applicable analytes. Out of 64 analytes run through the Mann-Kendall trend analysis, 46 analytes indicated no trend was present. Table 2-1 provides a list of the remaining 18 analytes that indicated either an increasing or decreasing trend. ProUCL output files and graphs for each test are provided in Attachment 3.

Table 2-1 List of Analytes with an Increasing or Decreasing Trend Indicated and Associated Criteria

TANK TUNNEL ID	ANALYTE	INDICATED TREND	RPMA ACLS ¹ (µg/L)	ADEC TABLE C CLEANUP LEVELS ² (µg/L)	HISTORICAL ANALYTE CONCENTRATION RANGE (µg/L)
Tank Tunnel 12	Acenaphthene	Decreasing	2,200	530	<0.0021 to 0.6
	DRO	Decreasing	15,000	1,500	280 to 2,600
	Pyrene	Decreasing	11,000	120	0.035 to 0.792
Tank Tunnel 13	DRO	Increasing	15,000	1,500	160 to 3,080
	RRO	Increasing	11,000	1,100	<76 to 1,700
Tank Tunnel 16	Benzo(a)anthracene	Decreasing	10	0.30	0.045 to 37
	Benzo(a)pyrene	Decreasing	2	0.25	< 0.0182 to 35
	Benzo(b)fluoranthene	Decreasing	10	2.5	0.023 to 81
	Benzo(k)fluoranthene	Decreasing	100	0.80	0.034 to 23
	Chrysene	Decreasing	1,000	2	0.018 to 35
	Dibenzo(a,h)anthracene	Decreasing	1	0.25	0.010 to 12
	DRO	Decreasing	15,000	1,500	2,200 to 220,000
	Fluoranthene	Decreasing	14,600	260	<0.0095 to 3
	Indeno(1,2,3-c,d)perylene	Decreasing	10	0.19	0.037 to 38
	Naphthalene	Decreasing	7,000	1.7	<0.029 to <2.6 (highest detection 2)
	Pyrene	Decreasing	11,000	120	<0.0455 to 95

Table 2-1 List of Analytes with an Increasing or Decreasing Trend Indicated and Associated Criteria

TANK TUNNEL ID	ANALYTE	INDICATED TREND	RPMA ACLS ¹ (µg/L)	ADEC TABLE C CLEANUP LEVELS ² (µg/L)	HISTORICAL ANALYTE CONCENTRATION RANGE (µg/L)
Tank Tunnel 17	GRO	Increasing	13,000	2,200	<10 to <330 (highest detection 77)
Tank Tunnel 18	Pyrene	Decreasing	11,000	120	0.0282 to 15

Notes:

¹ Groundwater screening criteria based on 2006 ADEC determination that shallow groundwater is non-potable. Groundwater cleanup levels were developed for GRO, DRO, RRO, BTEX, PAHs, and lead by multiplying the Table C values by 10, as provided in 18 AAC 75.345 in effect in 2006. Alaska cleanup regulations were revised in 2008 and the “10-times” rule was repealed; however, at that time, ADEC confirmed that it would typically allow continued use of the “10-times” rule at sites where it had been applied. In December 2008, Stantec Consulting Corporation petitioned ADEC to allow the continued use of the previously approved groundwater site-specific alternative cleanup levels for the site based on the “10-times” rule and received approval from ADEC via an email dated February 10, 2009 from John Halverson to Luke Smith, Stantec Consulting Corporation.

² 18 AAC 75 Table C Groundwater Cleanup Levels (ADEC 2021)

µg/L = microgram per liter

ACL = Alternative Cleanup Level

ADEC = Alaska Department of Environmental Conservation

DRO = diesel range organics

GRO = gasoline range organics

ID = identification

RPMA = Rocky Point Management Area

RRO = residual range organics

3. CONCLUSION AND RECOMMENDATIONS

Forty-six of 64 analytes run through the Mann-Kendall trend analysis indicated “no trend,” with five analytes in Tank 12 indicating stable concentrations and the remaining analytes in Tank 12 and all other tanks indicated as unstable. Table 3 identifies concentration stability for each analyte.

Fourteen of the analytes indicate a decreasing trend. Of these fourteen analytes, concentrations have been non-detect or below ADEC Table C cleanup levels for at least the last three years of annual sampling activities in 12 analytes. The remaining two analytes are DRO in Tank Tunnels 12 and 16. Although DRO in these tank tunnels has exceeded the ADEC Table C cleanup levels, concentrations are below the RPMA alternative cleanup levels (ACLs) and trends are decreasing. The trend analysis indicates an increasing trend for GRO in Tank Tunnel 17; however, analytical results for GRO have been non-detect since 2016 and have always been below ADEC Table C

cleanup levels. The identified increasing trend is due to changes in reporting limits and not trends in actual detected concentrations.

DRO and RRO were both found to have increasing trends in Tank Tunnel 13. Monthly inspections at this tank tunnel have noted that light sheen and minor LNAPL globules have been present on water located within the tank tunnel, but water was not noted as discharging from the tank tunnel at any point during the 2021 monthly inspections (TZ Engineering 2022).

The 2022 DRO and RRO results in Tank Tunnel 17 were observed to have increased by an order of magnitude above the 2021 results. Although the reasoning is unclear, as there were no changes to the sampling methods, it is possible that the decreased amount of water within the tank tunnels at the time of sampling (compared to the previous year) may have contributed to the increased relative concentration for fuel constituents. Further recommendations are provided in the 2022 Annual Groundwater Monitoring and Operation and Maintenance Report.

It is recommended that monthly monitoring of the tank tunnels continue for the next year (2023), at which point, it is recommended that another evaluation of monitoring frequency be conducted to determine if less frequent monitoring is justified.

Additionally, surface water sampling should continue to be collected from the tank tunnels on an annual basis; however, because there have been no detections of GRO or BTEX analytes above the ADEC Table C cleanup levels in any of the water samples collected since 2008, it is recommended that these analytes be removed from the annual sampling program and surface water samples are only analyzed for DRO, RRO, and PAHs.

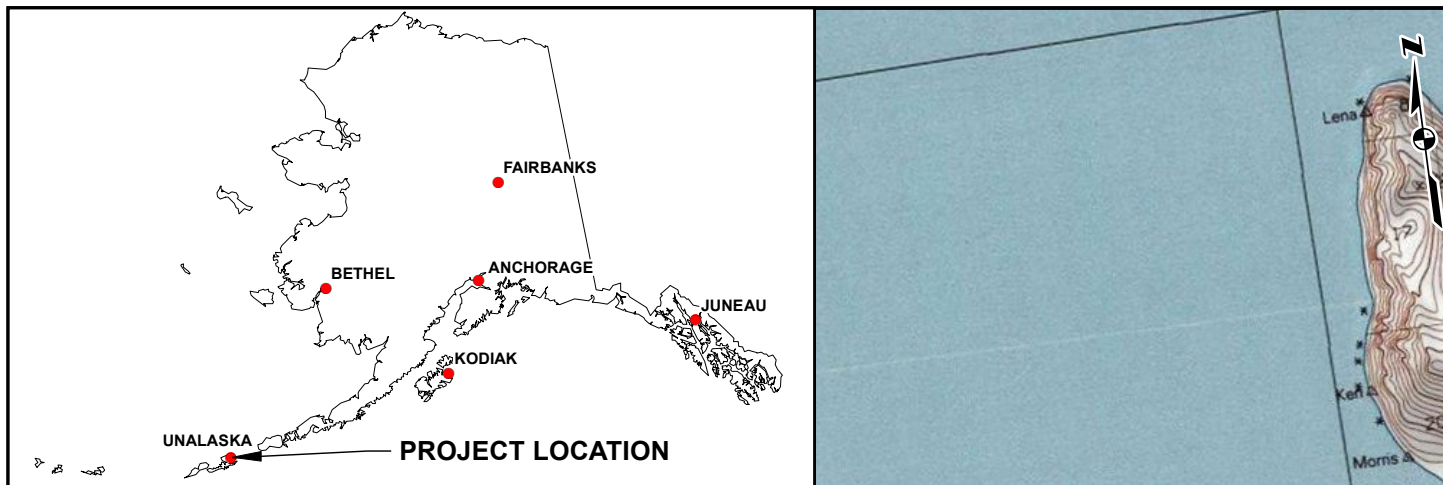
4. REFERENCES

- Alaska Department of Environmental Conservation (ADEC). 2021. *18 AAC 75 Oil and Other Hazardous Substances Pollution Control*. June.
- ADEC. 2006. Letter regarding Rocky Point Management Area, Amaknak Island, Unalaska – Approval of Alternative Soil Cleanup Levels. From John Halverson. To Tom Bauhs, Chevron Environmental Management Co. May 16.
- Stantec Consulting Services, Inc. (Stantec). 2018. *Focused Feasibility Study, Cut and Cover Tank Utility Tunnels, Rocky Point Management Area, Dutch Harbor, Unalaska, Alaska*. May.
- TZ Engineering, LLC (TZ Engineering). 2022 *Cut and Covered Tank Tunnel Weir Inspection Summary January 2021 – December 2021 Rocky Point Management Area, Dutch Harbor, Unalaska, Alaska*. February.

ATTACHMENT 1

FIGURES

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Basemap Source: Copyright © 2013 National Geographic Society, I-cubed

SCALE IN MILES



**CUT AND COVER TANK TUNNEL
SURFACE WATER TREND ANALYSIS – 2022
ROCKY POINT MANAGEMENT AREA
DUTCH HARBOR, UNALASKA, ALASKA**

STATE AND SITE VICINITY

DATE:
9/28/2022

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FIGURE:
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DUTCH HARBOR

Rocky Point

ILULAQ LAKE

Fuel Tank 17 and 18 Located to South Of Figure 4 Main Extent

CUT AND COVER TANK TUNNEL SURFACE WATER
TREND ANALYSIS – 2022 ROCKY POINT
MANAGEMENT AREA
DUTCH HARBOR, UNALASKA, ALASKA

**ROCKY POINT MANAGEMENT AREA CUT AND
COVER TANK TUNNEL LOCATIONS**

Legend

- ⊕ Lake Gauge
- Area Boundaries**
- Watershed Area
- Rocky Point Management Operational/Boundaries
- Site Features**
- Drainage Culvert
- Drainage Ditch
- EPLR Treatment System
- Interceptor Trench
- TTA
- Public and Private Streets
- Fuel Storage Tanks**
- Existing Fuel Storage Tank
- Former Fuel Storage Tank
- Cut and Cover Tanks
- Cut and Cover Tank Tunnels

Abbreviations

- EPLR East Point Loop Road
- TTA Thermal Treatment Area

Notes

1. For conceptual purposes only. All locations are approximate.
2. Map produced using ESRI ArcMap v. 10.7.

References

1. Imagery source: Service Layer Credits: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community.
2. Lake Gauge, Site Features, and Area Boundary locations were drafted from the georeferenced Figure 4 Site Plan of Farallon Consulting, 2020. Farallon PN: 1154-001. Rocky Point Management Area Dutch Harbor, Unalaska, Alaska. January.
3. Public and private streets shapefile was downloaded from the City of Unalaska, Alaska. Last updated July 2021.



ALASKA STATE PLANE COORDINATE SYSTEM ZONE 10, U.S. SURVEY FEET
HORIZONTAL DATUM: NAD83 (2011) | VERTICAL DATUM: NAVD88



PROJECT No.: 311304	DATE: 10/12/2022	FIGURE: 2
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ATTACHMENT 2

TABLES

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**Table 1A - GRO, DRO, RRO, and BTEX Results
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska**

Tank Tunnel	Date	Analytical Results (micrograms per liter)						
		DRO	RRO	GRO	Benzene	Toluene	Ethyl- benzene	Total Xylenes
ADEC Table C Groundwater Cleanup Levels ¹		1,500	1,100	2,200	4.6	1,100	15	190
ADEC Groundwater Screening Criteria ²		15,000	11,000	13,000	50	10,000	7,000	100,000
Tank 12	6/25/2004	2,430	795	< 50.0	< 0.200	< 0.500	< 0.500	< 1.00
	8/15/2005	1,300	960	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	5/25/2006	1,000	160	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	6/15/2007	1,200	< 210	< 10	< 1	< 1	< 1	< 2
	6/16/2008	2,400	2,300	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	6/16/2009	1,300	310	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	12/14/2016	2,600	1,700	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/17/2017	710	710	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	11/7/2017	690 B	230	< 330	< 0.42	< 0.24	< 0.21	< 0.72
	6/21/2018	960	650 B	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	10/22/2018	280 B	190 J B	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	6/17/2019	530	210 J	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	12/9/2020	< 566	< 472	< 100	< 0.40	< 1.0	< 1.0	< 3
	6/29/2021	1,170	632	< 100	< 0.5	< 1	< 1	< 3
6/29/2022	2,230	2210	< 100	< 0.4	< 1	< 1	< 3	
Tank 13	6/25/2004	2,640	< 500	224	0.626	< 0.500	18.3	9.22
	8/15/2005	200	86	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	5/25/2006	190	93	< 10	< 0.5	0.6	< 0.5	< 1.5
	6/15/2007	1,200	76	100	< 1	< 1	9	6
	6/19/2008	400 J	350	< 10	< 0.5	< 0.5	< 0.5	< 5.0
	6/16/2009	310	100	< 10	< 0.5	< 0.5	< 0.5	< 5.0
	5/21/2010	1,100	--	< 10	< 0.5	< 0.5	< 0.5	< 5.0
	4/27/2011	690	--	< 10	< 0.5	< 0.5	< 0.5	< 5.0
	12/14/2016	160 J	< 76	< 10	< 0.5	< 0.5	< 0.5	< 5.0
	5/17/2017	650	< 160	57 J	< 0.5	< 0.5	< 0.5	< 5.0
	11/7/2017	1,700 B	410	< 330	< 0.42	< 0.24	< 0.21	< 0.72
	6/21/2018	350	210 J B	< 250	< 3.0	0.55 J	1.0 J	5.5 J
	10/22/2018	590 B	160 J B	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	6/17/2019	930	810	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	12/9/2020	2,380	589	< 100	< 0.40	< 1.0	< 1.0	< 3.0
6/29/2021	2,460	1,700	40 J	< 0.5	< 1	< 1	< 3	
6/29/2022	3,080	1580 B	< 100	< 0.4	0.36 J	< 1	< 3	

Table 1A - GRO, DRO, RRO, and BTEX Results
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska

Tank Tunnel	Date	Analytical Results (micrograms per liter)						
		DRO	RRO	GRO	Benzene	Toluene	Ethyl-benzene	Total Xylenes
ADEC Table C Groundwater Cleanup Levels ¹		1,500	1,100	2,200	4.6	1,100	15	190
ADEC Groundwater Screening Criteria ²		15,000	11,000	13,000	50	10,000	7,000	100,000
Tank 16	8/16/2005	220,000	56,000	12	< 0.5	< 0.5	< 0.5	< 1.5
	6/19/2008	11,000 J	2,200	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	6/16/2009	8,800	1,500	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/21/2010	6,400	--	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	4/27/2011	3,300	--	16	< 0.5	< 0.5	< 0.5	< 0.5
	12/14/2016	5,400	1,100	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/17/2017	12,000	1,600 J	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	11/7/2017	3,500 B	430	< 330	< 0.42	< 0.24	< 0.21	< 0.72
	10/22/2018	4,300 B	610 B	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	6/17/2019	2,200	910	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	12/9/2020	4,900	1,010	< 100	< 0.40	< 1.0	< 1.0	< 3.0
	6/29/2021	2,290	1,050	< 100	< 0.5	< 1	< 1	< 3
	6/29/2022	3,310	1090 B	< 100	< 0.4	< 1	< 1	< 3
Tank 17	5/24/2006	37,000	500	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	5/24/2006 ³	40,000	1,400	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	6/15/2007	150,000	< 2,000	20	< 1	< 1	< 1	< 2
	6/19/2008	200,000	< 9,400	20	< 0.5	< 0.5	< 0.5	< 0.5
	6/16/2009	94,000	< 2,400	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/21/2010	210,000	--	28	< 0.5	< 0.5	< 0.5	< 0.5
	4/27/2011	190,000	--	77	< 0.5	< 0.5	< 0.5	0.6
	12/14/2016	2,100	< 76	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/17/2017	1,600	110 J	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	11/7/2017	1,800 B	410	< 330	< 0.42	< 0.24	< 0.21	< 0.72
	6/21/2018	65,000	5,000 B	< 250	< 3.0	< 2.0	0.75 J	3.7 J
	10/22/2018	54,000 B	1,700 B	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	6/17/2019	1,600	600	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	12/9/2020	4,470	1,060	< 100	< 0.40	< 1.0	< 1.0	< 3.0
	6/29/2021	166,000	6,110	< 100	< 0.5	< 1	< 1	< 3
6/29/2022	2,780,000	66,300	< 100	< 0.4	< 1	< 1	< 3	

**Table 1A - GRO, DRO, RRO, and BTEX Results
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska**

Tank Tunnel	Date	Analytical Results (micrograms per liter)						
		DRO	RRO	GRO	Benzene	Toluene	Ethylbenzene	Total Xylenes
ADEC Table C Groundwater Cleanup Levels ¹		1,500	1,100	2,200	4.6	1,100	15	190
ADEC Groundwater Screening Criteria ²		15,000	11,000	13,000	50	10,000	7,000	100,000
Tank 18	6/21/2004	7,770	3,450	< 50.0	< 0.200	< 0.500	< 0.500	< 1.00
	8/16/2005	31,000	30,000	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	8/16/2005 ³	4,200	4,300	< 10	< 0.5	< 0.5	< 0.5	< 1.5
	6/15/2007	2,300	270	80	5	3	5	20
	6/19/2008	28,000	24,000	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	6/16/2009	390	230	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/21/2010	720	--	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	12/14/2016	170 J	< 76	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	5/17/2017	210 J	130 J	< 10	< 0.5	< 0.5	< 0.5	< 0.5
	11/7/2017	330 B	80 J	< 330	< 0.42	< 0.24	< 0.21	< 0.72
	10/22/2018	4,700 B	250 J B	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	6/17/2019	210	130 J	< 250	< 3.0	< 2.0	< 3.0	< 5.0
	12/9/2020	< 566	< 472	< 100	< 0.40	< 1.0	< 1.0	< 3.0
	12/9/2020 ³	3,950 J	999	< 100	< 0.40	< 1.0	< 1.0	< 3.0
	6/29/2021	1,860 JD	914 JD	< 100	< 0.5	< 1	< 1	< 3
6/29/2021 ³	539 J, JD	175 J, JD	< 100	< 0.5	< 1	< 1	< 3	
6/29/2022	73,900	999 B	< 100	< 0.4	< 1	< 1	< 3	

NOTES:

Results in **bold** denote concentrations exceeding ADEC Table C cleanup levels.

Results in **bold** and highlighted **blue** denote concentrations exceeding RPMA ACLs.

< denotes analyte not detected at or exceeding the reporting limit listed.

--- denotes sample not analyzed.

¹Levels established in Table C, Groundwater Cleanup Levels, in Section 345 of Chapter 75 of Title 18 of the Alaska Administrative

²Groundwater screening criteria based on 2006 ADEC determination that shallow groundwater is non-potable. Groundwater cleanup levels were developed for GRO, DRO, RRO, BTEX, PAHs, and lead by multiplying the Table C values by 10, as provided in 18 AAC 75.345 in effect in 2006. Alaska cleanup regulations were revised in 2008 and the "10-times" rule was repealed; however, at that time, ADEC confirmed that it would typically allow continued use of the "10-times" rule at sites where it had been applied. In December 2008, Stantec Consulting Corporation petitioned ADEC to allow the continued use of the previously approved groundwater site-specific alternative cleanup levels for the site based on the "10-times" rule and received approval from ADEC via an email dated February 10, 2009 from John Halverson to Luke Smith, Stantec Consulting Corporation.

³Sample is a quality assurance/quality control field duplicate.

ADEC = Alaska Department of Environmental Conservation

B = Sample result may be biased high as it was detected in the associated method blank.

BTEX = benzene, toluene, ethylbenzene, and xylenes

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

GRO = TPH as gasoline-range organics

J = Result is considered an estimate.

JD = Result is considered estimated due to duplicate imprecision.

PAHs = polynuclear aromatic hydrocarbons

RRO = TPH as residual-range organics

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Table 1B - PAH Results
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska

Tank Tunnel	Date	Analytical Results (micrograms per liter)															
		Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)perylene	Naphthalene	Phenanthrene	Pyrene
ADEC Table C Groundwater Cleanup Levels ¹		530	260	43	0.30	0.25	2.5	0.26	0.80	2.0	0.25	260	290	0.19	1.7	170	120
ADEC Groundwater Screening Criteria ²		2,200	NA	110,000	10.0	2.0	10	NA	100	1,000	1.0	14,600	14,600	10.0	7,000	NA	11,000
Tank 12	6/25/2004	0.515	< 0.100	0.436	0.277	0.139	< 0.100	< 0.100	< 0.100	0.495	< 0.100	0.158	0.396	< 0.100	< 0.100	0.495	0.792
	8/15/2005	0.6	0.03	0.3	0.06	0.020	< 0.02	< 0.02	< 0.01	0.090	< 0.02	0.060	0.100	< 0.02	0.200	0.300	0.300
	5/25/2006	0.34	< 0.02	0.19	0.021	< 0.02	< 0.02	< 0.02	< 0.01	0.022	< 0.02	0.027	0.031	< 0.02	0.100	0.080	0.180
	6/15/2007	0.15	< 0.01	< 0.01	0.13	0.086	0.064	0.039	< 0.01	0.290	0.013	0.082	< 0.01	0.012	0.077	< 0.01	0.680
	6/19/2008	< 0.0095	< 0.0095	0.045	0.054	0.029	0.027	0.018	0.010	0.160	< 0.0095	0.053	< 0.0095	< 0.0095	0.053	0.019	0.260
	6/16/2009	0.11	0.017	0.013	< 0.0095	0.010	< 0.0095	0.011	< 0.0095	< 0.0095	< 0.0095	0.030	0.018	< 0.0095	0.046	0.031	0.160
	12/14/2016	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	0.011 J	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.028	< 0.028	0.04 J
	5/11/2017	< 0.0095	< 0.0095	0.016 J	0.023 J	0.035 J	0.018 J	0.050	< 0.0095	0.082	0.010 J	0.017 J	< 0.0095	0.016 J	< 0.028	< 0.028	0.089
	11/7/2017	< 0.0021	< 0.0021	< 0.0031	0.0064 J B	0.011 J B	< 0.0082	0.012 J B	< 0.0093	0.015 J B	0.0066 J B	< 0.0021	< 0.0031	0.0083 J	< 0.013	< 0.0041	0.035 B
	6/21/2018	< 0.10	< 0.052	< 0.10	0.019 J	0.011 J	0.016 J	0.016 J	< 0.052	0.039 J	< 0.10	< 0.21	< 0.10	< 0.052	< 0.10	< 0.10	0.051 J
	10/22/2018	< 0.10	< 0.052	< 0.10	< 0.052	< 0.10	< 0.052	< 0.052	< 0.052	< 0.10	< 0.10	< 0.21	< 0.10	< 0.052	< 0.10	< 0.10	< 0.10
	6/17/2019	< 0.10	< 0.051	< 0.10	< 0.051	< 0.10	< 0.051	< 0.051	< 0.051	< 0.10	< 0.10	< 0.21	< 0.10	< 0.051	< 0.10	< 0.10	< 0.10
	12/9/2020	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0185	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0185	< 0.0463	< 0.0463	< 0.0463	< 0.0926	< 0.0463	< 0.0463
6/29/2021	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	0.0277 J	< 0.0455	0.108	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0909	< 0.0455	0.134	
6/29/2022	< 0.0481	< 0.0481	< 0.0481	0.16	0.096	< 0.0481	0.0452 J	< 0.0481	0.314	< 0.0192	0.114	< 0.0481	< 0.0481	< 0.0962	0.451	0.597	
Tank 13	6/25/2004	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	0.951	< 0.100	< 0.100	< 0.100	< 0.100	
	8/15/2005	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.01	< 0.01	< 0.02	< 0.01	< 0.01	< 0.02
	5/25/2006	< 0.01	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.02	< 0.01	< 0.02	< 0.02	< 0.01	< 0.01	< 0.02	0.017	< 0.01	< 0.02
	6/15/2007	0.29	< 0.0099	0.13	< 0.0099	< 0.0099	< 0.0099	< 0.0099	< 0.0099	0.015	< 0.0099	0.031	0.85	< 0.0099	0.31	0.078	0.072
	6/19/2008	< 0.0096	< 0.0096	< 0.0096	0.015	0.016	0.024	< 0.0096	< 0.0096	0.019	< 0.0096	0.043	< 0.0096	< 0.0096	< 0.0096	0.027	0.03
	6/16/2009	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096
	5/21/2010	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	0.014	< 0.0098	< 0.0098	0.034	0.020	0.010
	4/27/2011	0.027	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	0.13	< 0.0096	< 0.0096
	12/14/2016	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.0098	< 0.029	< 0.029	< 0.0098
	5/11/2017	< 0.0098	< 0.0098	< 0.0098	0.011 J	0.012 J	0.016 J	0.016 J	0.011 J	0.015 J	0.015 J	0.021 J	< 0.0098	0.019 J	< 0.029	< 0.029	0.014 J
	11/7/2017	< 0.0024	< 0.0024	< 0.0035	0.0089 J B	0.0067 J B	< 0.0094	0.0056 J B	< 0.011	< 0.0071	0.0077 J B	< 0.0024	< 0.0035	< 0.0082	< 0.015	< 0.0047	< 0.0047
	6/21/2018	< 0.52	< 0.26	< 0.52	< 0.26	< 0.52	< 0.26	< 0.06	< 0.26	< 0.52	< 0.52	< 1.0	< 0.52	< 0.26	< 0.52	< 0.52	< 0.52
	10/22/2018	< 0.10	< 0.052	< 0.10	< 0.052	< 0.10	< 0.052	< 0.052	< 0.052	< 0.10	< 0.10	< 0.21	< 0.10	< 0.052	< 0.10	< 0.10	< 0.10
	6/17/2019	0.078 J	< 0.051	0.051 J	0.031 J	0.033 J	< 0.051	< 0.051	< 0.051	0.016 J	< 0.10	0.18 J	0.082 J	< 0.051	0.15	0.31	0.15
12/9/2020	0.0575	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	0.198	< 0.0455	< 0.0909	< 0.0455	< 0.0455	
6/29/2022	< 0.0481	< 0.0481	< 0.0481	< 0.0481	< 0.0192	< 0.0481	< 0.0481	< 0.0481	< 0.0481	< 0.0192	< 0.0481	< 0.0481	< 0.0481	< 0.0962	< 0.0962	< 0.0481	
Tank 16	8/16/2005	11	2	28	37	35	81	44	23	35	12	0.9	3	38	2	12	95
	6/19/2008	< 0.0095	0.15 J	0.18 J	0.47 J	0.51 J	1.6 J	0.55 J	0.69 J	1.1 J	0.17 J	1.1 J	< 0.0095	0.58 J	0.29 J	0.49 J	0.97 J
	6/16/2009	< 0.0095	0.26	< 0.0095	0.13	0.18	0.50	0.18	0.21	0.27	0.11	0.31	< 0.0095	0.18	0.21	< 0.0095	0.44
	5/21/2010	< 0.096	< 0.096	0.16	0.65	1.1	3.2	2.2	1.0	1.4	0.43	1.4	< 0.096	1.8	< 0.096	0.38	2.1
	4/27/2011	0.17	0.049	0.11	0.082	0.023	0.13	0.041	0.055	0.13	0.010	0.57	0.38	0.037	0.15	0.081	0.38
	12/14/2016	< 0.0096	< 0.0096	< 0.0096	0.50	1.2	3.5	0.8	1.1	1.4	0.230	1.1	0.07	0.81	< 0.029	< 0.029	2.4
	5/11/2017	< 0.048	< 0.048	< 0.048	2.7	3.8	7.4	4.8	2.3	2.6	1.1	3.2	< 0.048	4.2	< 0.14	< 0.14	4.5
	11/7/2017	< 0.010	< 0.010	< 0.015	0.083 J B	0.089 J B	0.35	0.021 B	0.11 J	0.018 B	0.049 J B	0.28 B	0.024 B	0.25	< 0.066	< 0.020	0.32 B
	10/22/2018	< 0.10	< 0.050	< 0.10	< 0.050	< 0.10	0.023 J	< 0.050	< 0.050	< 0.10	< 0.10	< 0.20	< 0.10	< 0.050	0.23	< 0.10	0.091 J
	6/17/2019	< 2.6	< 1.3	< 2.6	3.4	5.6	10	7.8	3.3	5.2	1.6 J	5.1 J	0.50 J	11	< 2.6	< 2.6	9.3
	12/9/2020	0.116	< 0.0463	< 0.0463	< 0.0463	< 0.0185	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0185	0.167	0.146	< 0.0463	< 0.0926	< 0.0463	0.153
	6/29/2021	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0909	< 0.0455	< 0.0455
6/29/2022	< 0.0446	< 0.0446	< 0.0446	0.045	0.0646	0.122	0.0513	0.034 J	0.0432 J	< 0.0179	< 0.0446	< 0.0446	0.0444 J	0.0703 J	< 0.0893	0.333	

Table 1B - PAH Results
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska

Tank Tunnel	Date	Analytical Results (micrograms per liter)															
		Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)perylene	Naphthalene	Phenanthrene	Pyrene
ADEC Table C Groundwater Cleanup Levels ¹		530	260	43	0.30	0.25	2.5	0.26	0.80	2.0	0.25	260	290	0.19	1.7	170	120
ADEC Groundwater Screening Criteria ²		2,200	NA	110,000	10.0	2.0	10	NA	100	1,000	1.0	14,600	14,600	10.0	7,000	NA	11,000
Tank 17	5/24/2006	1.1	< 0.02	< 0.02	0.026	< 0.02	0.088	0.054	0.022	0.16	< 0.02	< 0.01	0.26	0.031	0.16	< 0.01	0.51
	5/24/2006 ³	1.5	< 0.02	< 0.02	0.052	0.028	0.13	0.072	0.022	0.21	< 0.02	< 0.01	0.41	0.043	0.16	< 0.01	0.84
	6/15/2007	< 0.5	< 0.5	13	< 0.5	< 0.5	0.71	< 0.5	< 0.5	2.2	< 0.5	7.5	17	< 0.5	< 0.5	42	6.6
	6/19/2008	< 0.095	< 0.095	< 0.095	< 0.095	< 0.095	0.33	0.11	< 0.095	1	< 0.095	0.62	< 0.095	< 0.095	0.21	14	2.1
	6/16/2009	< 0.096	< 0.096	21	< 0.096	< 0.096	0.20	< 0.096	< 0.096	0.55	< 0.096	3.0	2.4	< 0.096	0.19	13	1.4
	5/21/2010	0.62	0.15	5.2	0.22	0.10	0.33	0.21	0.15	0.85	< 0.097	2.0	7.3	0.11	0.42	13	3.6
	4/27/2011	10	8.8	9.0	0.17	< 0.10	0.35	0.17	0.12	0.57	< 0.10	4.2	54	0.12	2.1	190	2.6
	12/14/2016	0.15	< 0.0095	0.2	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	0.02 J	< 0.0095	0.1	0.3	< 0.0095	< 0.028	0.24	0.067
	5/11/2017	< 0.0096	< 0.0096	0.027 J	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.029	< 0.029	< 0.0096
	11/7/2017	< 0.0023	< 0.0023	< 0.0034	0.0079 JB	0.0060 JB	< 0.0092	0.0059 JB	< 0.010	0.0071 J B	0.0068 J B	< 0.0023	< 0.0034	0.0088 J	< 0.015	< 0.0046	< 0.0046
	6/21/2018	0.29	0.20	0.45	0.43	0.40	0.45	0.38	0.37	0.40	0.40	0.54	0.68	0.52	< 0.10	0.64	0.50
	10/22/2018	0.97	0.75	2.3	0.12 J	0.062 J	< 0.27	0.065 J	< 0.27	0.022 J	< 0.53	< 1.1	4.9	< 0.27	< 0.53	19	1.1
	6/17/2019	< 0.10	< 0.051	< 0.10	< 0.051	< 0.10	< 0.051	< 0.051	< 0.051	< 0.10	< 0.10	< 0.20	< 0.10	< 0.051	< 0.10	0.036 J	< 0.10
	12/9/2020	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	0.156	< 0.0455	< 0.0909	< 0.0455
6/29/2021	< 1.18	< 1.18	< 1.18	< 1.18	< 0.472	< 1.18	< 1.18	< 1.18	< 1.18	< 1.18	< 0.472	< 1.18	< 1.18	< 1.18	< 2.36	< 1.18	1.07 J
6/29/2022	< 4.46	< 4.46	< 4.46	1.87 J	< 1.79	< 4.46	1.7 J	< 4.46	4.52	< 1.79	< 4.46	< 4.46	< 4.46	< 4.46	< 8.93	205	17.4
Tank 18	6/21/2004	< 0.100	< 0.100	< 0.100	0.868	0.509	0.226	0.226	0.113	1.45	0.189	< 0.100	< 0.100	0.132	< 0.100	< 0.100	4.40
	8/16/2005	3	0.4	9	2	0.9	0.80	0.7	0.1	3	0.2	2	4	0.3	1	8	15
	8/16/2005 ³	1	0.1	1	0.2	0.1	0.07	0.1	0.03	0.3	0.04	0.3	1	0.05	0.6	1	2
	6/15/2007	1.4	0.12	0.26	0.14	0.11	0.081	0.063	< 0.01	0.25	0.018	0.17	0.98	0.018	0.66	0.7	1.3
	6/19/2008	< 0.0098	< 0.0098	0.086	0.14	0.097	0.062	0.046	0.031	0.31	0.015	0.22	0.036	0.017	0.051	0.37	1.1
	6/16/2009	< 0.0096	< 0.0096	< 0.0096	0.044	0.017	0.023	0.012	< 0.0096	0.053	< 0.0096	0.019	< 0.0096	< 0.0096	0.030	< 0.0096	0.23
	5/21/2010	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	< 0.0096	0.017	< 0.0096	< 0.0096	0.011	< 0.0096	0.047	< 0.0096	0.077
	12/14/2016	< 0.0095	< 0.0095	< 0.0095	0.010 J	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.0095	< 0.028	< 0.028	0.04 J
	5/11/2017	< 0.0098	< 0.0098	< 0.0098	0.047 J	0.013 J	0.020 J	0.025 J	< 0.0098	0.011	< 0.0098	0.032 J	< 0.0098	< 0.0098	< 0.030	< 0.030	0.32
	11/7/2017	< 0.0021	< 0.0021	< 0.0031	0.0064 J B	0.0041 J B	< 0.0083	0.0043 J B	< 0.0093	0.0065 J B	0.0048 J B	< 0.0021	< 0.0031	< 0.0072	< 0.013	< 0.0041	0.049 B
	10/22/2018	< 0.11	< 0.053	< 0.11	< 0.053	< 0.11	< 0.053	< 0.053	< 0.053	0.020 J	< 0.11	< 0.21	< 0.11	< 0.053	< 0.11	< 0.11	0.12
	6/17/2019	< 0.10	< 0.052	< 0.10	< 0.052	< 0.10	< 0.052	< 0.052	< 0.052	< 0.10	< 0.10	< 0.21	< 0.10	< 0.052	< 0.10	< 0.10	< 0.10
	12/9/2020	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0185	< 0.0463	< 0.0463	< 0.0463	< 0.0463	< 0.0185	< 0.0463	< 0.0463	< 0.0463	< 0.0926	< 0.0463	< 0.0463
	12/9/2020 ³	0.0498	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	0.159	< 0.0455	< 0.0909	< 0.0455	0.0489
	6/29/2021	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	0.0238 J	< 0.0455	< 0.0909	0.0311 J	0.0282 J, JD
	6/29/2021 ³	< 0.0455 J	< 0.0455 J	< 0.0455 J	< 0.0455	< 0.0182	< 0.0455	< 0.0455	< 0.0455	< 0.0455	< 0.0182	< 0.0455	< 0.0455 J	< 0.0455	< 0.0909 J	< 0.0455 J	0.0509 JD
6/29/2022	< 0.893	< 0.893	< 0.893	0.0663	< 0.357	< 0.893	0.0394 J	< 0.893	0.145	< 0.357	< 0.893	< 0.893	< 0.893	< 0.893	< 1.79	< 1.79	0.608 J

NOTES:

Results in **bold** denote concentrations exceeding ADEC Table C cleanup levels.
 Results in bold and highlighted blue denote concentrations exceeding RPMA ACLs.
 < denotes analyte not detected at or above the reporting limit listed.
 --- denotes sample not analyzed.

ADEC = Alaska Department of Environmental Conservation
 B = Sample result may be biased high as it was detected in the associated method blank.
 J = Result is considered an estimate.
 JD = Result is considered estimated due to duplicate imprecision.
 PAHs = polynuclear aromatic hydrocarbons

¹Levels established in Table C, Groundwater Cleanup Levels, in Section 345 of Chapter 75 of Title 18 of the Alaska Administrative Code (18 AAC 75.345), as amended through November 18, 2021.
²Groundwater screening criteria based on 2006 ADEC determination that shallow groundwater is non-potable. Groundwater cleanup levels were developed for GRO, DRO, RRO, BTEX, PAHs, and lead by multiplying the Table C values by 10, as provided in 18 AAC 75.345 in effect in 2006. Alaska cleanup regulations were revised in 2008 and the "10-times" rule was repealed; however, at that time, ADEC confirmed that it would typically allow continued use of the "10-times" rule at sites where it had been applied. In December 2008, Stantec Consulting Corporation petitioned ADEC to allow the continued use of the previously approved groundwater site-specific alternative cleanup levels for the site based on the "10-times" rule and received approval from ADEC via an email dated February 10, 2009 from John Halverson to Luke Smith, Stantec Consulting Corporation.

³Sample is a quality assurance/quality control field duplicate.

**Table 2 - Mann-Kendall Applicability
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska**

Location	Analyte	Total Data Points	Valid Data Points	M-K Applicability (at Least 4 Valid Data Points)
Tank 12	Acenaphthene	15	5	Yes
	Acenaphthylene	15	2	No
	Anthracene	15	5	Yes
	Benzene	15	0	No
	Benzo(a)anthracene	15	5	Yes
	Benzo(a)pyrene	15	5	Yes
	Benzo(b)fluoranthene	15	2	No
	Benzo(g,h,i)perylene	15	4	Yes
	Benzo(k)fluoranthene	15	1	No
	Chrysene	15	7	Yes
	Dibenzo(a,h)anthracene	15	1	No
	DRO	15	11	Yes
	Ethylbenzene	15	0	No
	Fluoranthene	15	6	Yes
	Fluorene	15	4	Yes
	GRO	15	0	No
	Indeno(1,2,3-c,d)perylene	15	0	No
	Naphthalene	15	5	Yes
	Phenanthrene	15	5	Yes
	Pyrene	15	8	Yes
	RRO	15	9	Yes
	Toluene	15	0	No
Xylenes	15	0	No	
Tank 13	Acenaphthene	16	3	No
	Acenaphthylene	16	0	No
	Anthracene	16	1	No
	Benzene	17	1	No
	Benzo(a)anthracene	16	1	No
	Benzo(a)pyrene	16	1	No
	Benzo(b)fluoranthene	16	1	No
	Benzo(g,h,i)perylene	16	0	No
	Benzo(k)fluoranthene	16	0	No
	Chrysene	16	2	No
	Dibenzo(a,h)anthracene	16	1	No
	DRO	17	12	Yes
	Ethylbenzene	17	2	No
	Fluoranthene	16	3	No
	Fluorene	16	3	No
	GRO	17	3	No
	Indeno(1,2,3-c,d)perylene	16	0	No
	Naphthalene	16	5	Yes
	Phenanthrene	16	4	Yes
	Pyrene	16	4	Yes
	RRO	15	9	Yes
	Toluene	17	1	No
Xylenes	17	3	No	

**Table 2 - Mann-Kendall Applicability
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska**

Location	Analyte	Total Data Points	Valid Data Points	M-K Applicability (at Least 4 Valid Data Points)
Tank 16	Acenaphthene	13	3	No
	Acenaphthylene	13	3	No
	Anthracene	13	3	No
	Benzene	13	0	No
	Benzo(a)anthracene	13	7	Yes
	Benzo(a)pyrene	13	7	Yes
	Benzo(b)fluoranthene	13	8	Yes
	Benzo(g,h,i)perylene	13	7	Yes
	Benzo(k)fluoranthene	13	7	Yes
	Chrysene	13	7	Yes
	Dibenzo(a,h)anthracene	13	7	Yes
	DRO	13	9	Yes
	Ethylbenzene	13	0	No
	Fluoranthene	13	7	Yes
	Fluorene	13	4	Yes
	GRO	13	2	No
	Indeno(1,2,3-c,d)perylene	13	8	Yes
	Naphthalene	13	4	Yes
	Phenanthrene	13	3	No
	Pyrene	13	8	Yes
	RRO	11	8	Yes
	Toluene	13	0	No
Xylenes	13	0	No	
Tank 17	Acenaphthene	15	7	Yes
	Acenaphthylene	15	4	Yes
	Anthracene	15	7	Yes
	Benzene	15	0	No
	Benzo(a)anthracene	15	5	Yes
	Benzo(a)pyrene	15	3	No
	Benzo(b)fluoranthene	15	7	Yes
	Benzo(g,h,i)perylene	15	5	Yes
	Benzo(k)fluoranthene	15	4	Yes
	Chrysene	15	7	Yes
	Dibenzo(a,h)anthracene	15	1	No
	DRO	15	12	Yes
	Ethylbenzene	15	0	No
	Fluoranthene	15	7	Yes
	Fluorene	15	10	Yes
	GRO	15	4	Yes
	Indeno(1,2,3-c,d)perylene	15	5	Yes
	Naphthalene	15	5	Yes
	Phenanthrene	15	8	Yes
	Pyrene	15	11	Yes
	RRO	13	5	Yes
	Toluene	15	0	No
Xylenes	15	1	No	

**Table 2 - Mann-Kendall Applicability
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska**

Location	Analyte	Total Data Points	Valid Data Points	M-K Applicability (at Least 4 Valid Data Points)
Tank 18	Acenaphthene	14	4	Yes
	Acenaphthylene	14	3	No
	Anthracene	14	4	Yes
	Benzene	14	1	No
	Benzo(a)anthracene	14	5	Yes
	Benzo(a)pyrene	14	5	Yes
	Benzo(b)fluoranthene	14	5	Yes
	Benzo(g,h,i)perylene	14	5	Yes
	Benzo(k)fluoranthene	14	3	No
	Chrysene	14	7	Yes
	Dibenzo(a,h)anthracene	14	4	Yes
	DRO	14	8	Yes
	Ethylbenzene	14	1	No
	Fluoranthene	14	4	Yes
	Fluorene	14	4	Yes
	GRO	14	1	No
	Indeno(1,2,3-c,d)perylene	14	4	Yes
	Naphthalene	14	5	Yes
	Phenanthrene	14	3	No
	Pyrene	14	9	Yes
	RRO	13	6	Yes
	Toluene	14	1	No
	Xylenes	14	1	No

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Table 3 - Mann-Kendall Results Summary
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska

Location	Analyte	Statistic (S)	Standard Deviation of S	Standardized Value of S	p-value	Coefficient of Variation	Trend	Stability	Historical Concentration Ranges (micrograms per liter)
Tank 12	Acenaphthene	-47	20.02	-2.297	0.0108	1.31	Decreasing	Unstable	< 0.0021 - 0.6
	Anthracene	-22	20.12	-1.044	0.148	1.294	No Trend	Unstable	< 0.0031 - 0.436
	Benzo(a)anthracene	-12	20.18	-0.545	0.293	1.137	No Trend	Unstable	0.0064 J,B - 0.277
	Benzo(a)pyrene	-2	20.13	-0.0497	0.48	0.936	No Trend	Stable	< 0.0095 - 0.139
	Benzo(g,h,i)perylene	6	20.18	0.248	0.402	0.699	No Trend	Stable	< 0.0095 - < 0.1
	Chrysene	8	20.18	0.347	0.364	1.104	No Trend	Unstable	< 0.0095 - 0.495
	DRO	-34	20.18	-1.635	0.051	0.592	Decreasing	Stable	280 B - 2600
	Fluoranthene	2	20.12	0.0497	0.48	0.897	No Trend	Stable	< 0.0021 - < 0.21
	Fluorene	-10	19.9	-0.452	0.326	1.476	No Trend	Unstable	< 0.0031 - 0.396
	Naphthalene	-24	19.77	-1.164	0.122	0.585	No Trend	Stable	< 0.013 - 0.2
	Phenanthrene	5	20.09	0.199	0.421	1.303	No Trend	Unstable	< 0.0041 - 0.495
Pyrene	-34	20.18	-1.635	0.051	1.048	Decreasing	Unstable	0.035 B - 0.792	
RRO	-2	20.18	-0.0495	0.48	0.921	No Trend	Stable	160 - 2300	
Tank 13	DRO	44	24.28	1.771	0.0383	0.865	Increasing	Stable	160 J - 3080
	Naphthalene	25	22.14	1.084	0.139	1.364	No Trend	Unstable	< 0.0096 - < 0.52
	Phenanthrene	26	22.12	1.13	0.129	1.636	No Trend	Unstable	< 0.0047 - < 0.52
	Pyrene	5	22.14	0.181	0.428	1.784	No Trend	Unstable	< 0.0047 - < 0.52
	RRO	53	20.16	2.58	0.0094	1.146	Increasing	Unstable	76 - 1700
Tank 16	Benzo(a)anthracene	-40	16.39	-2.379	0.00867	2.914	Decreasing	Unstable	0.045 - 37
	Benzo(a)pyrene	-28	16.39	-1.647	0.0498	2.608	Decreasing	Unstable	< 0.0182 - 35
	Benzo(b)fluoranthene	-28	16.39	-1.647	0.0498	2.659	Decreasing	Unstable	0.023 J - 81
	Benzo(g,h,i)perylene	-20	16.39	-1.159	0.123	2.586	No Trend	Unstable	0.021 B - 44
	Benzo(k)fluoranthene	-38	16.39	-2.257	0.012	2.546	Decreasing	Unstable	0.034 J - 23
	Chrysene	-33	16.36	-1.956	0.0252	2.618	Decreasing	Unstable	0.018 B - 35
	Dibenzo(a,h)anthracene	-32	16.39	-1.891	0.0293	2.687	Decreasing	Unstable	0.01 - 12
	DRO	-44	16.39	-2.623	0.00435	2.693	Decreasing	Unstable	2200 - 220000
	Fluoranthene	-31	16.36	-1.834	0.0334	1.331	Decreasing	Unstable	< 0.0446 - 5.1 J
	Fluorene	-3	16.36	-0.122	0.451	2.373	No Trend	Unstable	< 0.0095 - 3
	Indeno(1,2,3-c,d)perylene	-30	16.39	-1.769	0.0384	2.405	Decreasing	Unstable	0.037 - 38
	Naphthalene	-28	16.39	-1.647	0.0498	1.771	Decreasing	Unstable	0.029 J - < 2.6
	Pyrene	-30	16.39	-1.769	0.0384	2.912	Decreasing	Unstable	< 0.0455 - 95
RRO	-21	12.85	-1.557	0.0597	2.696	No Trend	Unstable	430 - 56000	
Tank 17	Acenaphthene	3	20.21	0.099	0.461	2.129	No Trend	Unstable	< 0.0023 - 10
	Acenaphthylene	19	20.21	0.891	0.187	2.395	No Trend	Unstable	< 0.0023 - 8.8
	Anthracene	-9	20.21	-0.396	0.346	1.682	No Trend	Unstable	< 0.0034 - 21
	Benzo(a)anthracene	11	20.21	0.495	0.31	1.624	No Trend	Unstable	0.0079 JB - 1.87 J
	Benzo(b)fluoranthene	8	20.18	0.347	0.364	1.407	No Trend	Unstable	< 0.0092 - < 4.46
	Benzo(g,h,i)perylene	3	20.21	0.099	0.461	1.599	No Trend	Unstable	0.0059 JB - 1.7 J
	Benzo(k)fluoranthene	23	20.21	1.089	0.138	1.757	No Trend	Unstable	< 0.0095 - < 4.46
	Chrysene	-9	20.21	-0.396	0.346	1.539	No Trend	Unstable	0.0071 JB - 4.52
	DRO	-8	20.18	-0.347	0.364	2.653	No Trend	Unstable	1600 - 2780000
	Fluoranthene	-9	20.21	-0.396	0.346	1.378	No Trend	Unstable	< 0.0023 - 7.5
	Fluorene	-9	20.21	-0.396	0.346	2.315	No Trend	Unstable	< 0.0034 - 54
	GRO	38	19.85	1.864	0.0312	1.103	Increasing	Unstable	< 10 - < 330
	Indeno(1,2,3-c,d)perylene	23	20.21	1.089	0.138	1.72	No Trend	Unstable	0.0088 J - < 4.46
	Naphthalene	10	20.18	0.446	0.328	1.673	No Trend	Unstable	< 0.015 - < 8.93
	Phenanthrene	-2	20.18	-0.0495	0.48	2.04	No Trend	Unstable	< 0.0046 - 205
	Pyrene	-19	20.21	-0.891	0.187	1.799	No Trend	Unstable	< 0.0046 - 17.4
RRO	16	16.39	0.915	0.18	2.41	No Trend	Unstable	< 76 - 66300	

Table 3 - Mann-Kendall Results Summary
Cut and Cover Tank Tunnel Trend Analysis, Rocky Point Management Area, Dutch Harbor, Alaska

Location	Analyte	Statistic (S)	Standard Deviation of S	Standardized Value of S	p-value	Coefficient of Variation	Trend	Stability	Historical Concentration Ranges (micrograms per liter)
Tank 18	Acenaphthene	-6	18.18	-0.275	0.392	2.22	No Trend	Unstable	< 0.0021 - 3
	Anthracene	-9	18.21	-0.439	0.33	3.259	No Trend	Unstable	< 0.0031 - 9
	Benzo(a)anthracene	-22	18.24	-1.151	0.125	1.966	No Trend	Unstable	0.0064 JB - 2
	Benzo(a)pyrene	-18	18.24	-0.932	0.176	1.692	No Trend	Unstable	0.0041 JB - 0.9
	Benzo(b)fluoranthene	-21	18.27	-1.095	0.137	1.674	No Trend	Unstable	< 0.0083 - < 0.893
	Benzo(g,h,i)perylene	-13	18.27	-0.657	0.256	1.643	No Trend	Unstable	0.0043 JB - 0.7
	Chrysene	-23	18.27	-1.204	0.114	2.032	No Trend	Unstable	0.0065 JB - 3
	Dibenzo(a,h)anthracene	-4	18.24	-0.164	0.435	1.191	No Trend	Unstable	0.0048 JB - < 0.357
	DRO	-10	18.24	-0.493	0.311	1.866	No Trend	Unstable	170 J - 73900
	Fluoranthene	-4	18.24	-0.164	0.435	2.062	No Trend	Unstable	< 0.0021 - 2
	Fluorene	-2	18.24	-0.0548	0.478	2.467	No Trend	Unstable	< 0.0031 - 4
	Indeno(1,2,3-c,d)perylene	0	18.24	N/A	N/A	1.584	No Trend	Unstable	< 0.0072 - < 0.893
	Naphthalene	-7	18.21	-0.329	0.371	1.484	No Trend	Unstable	< 0.013 - < 1.79
	Pyrene	-43	18.27	-2.299	0.0107	2.392	Decreasing	Unstable	0.0282 J, JD - 15
RRO	-9	16.36	-0.489	0.312	2.06	No Trend	Unstable	< 76 - 30000	

Notes:

Values calculated with ProUCL; non-detect values entered at the reporting limit with a designator of "0".

A negative S value with confidence > 95% indicates a decreasing concentration trend.

A positive S value with confidence > 95% indicates an increasing concentration trend.

Any S value with confidence < 95% indicates there is likely no significant concentration trend.

A coefficient of variation < 1 indicates concentrations are stable regardless of the trend. The closer to zero the coefficient of variation, the less variation in concentrations between sampling events.

ATTACHMENT 3

TREND DIAGRAMS

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Tank Tunnel 12

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Tank 12 Acenaphthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.0250
Standardized Value of S	-2.2971
M-K Test Value (S)	-47
Tabulated p-value	0.0100
Approximate p-value	0.0108

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 12 Anthracene Mann-Kendall Trend Test



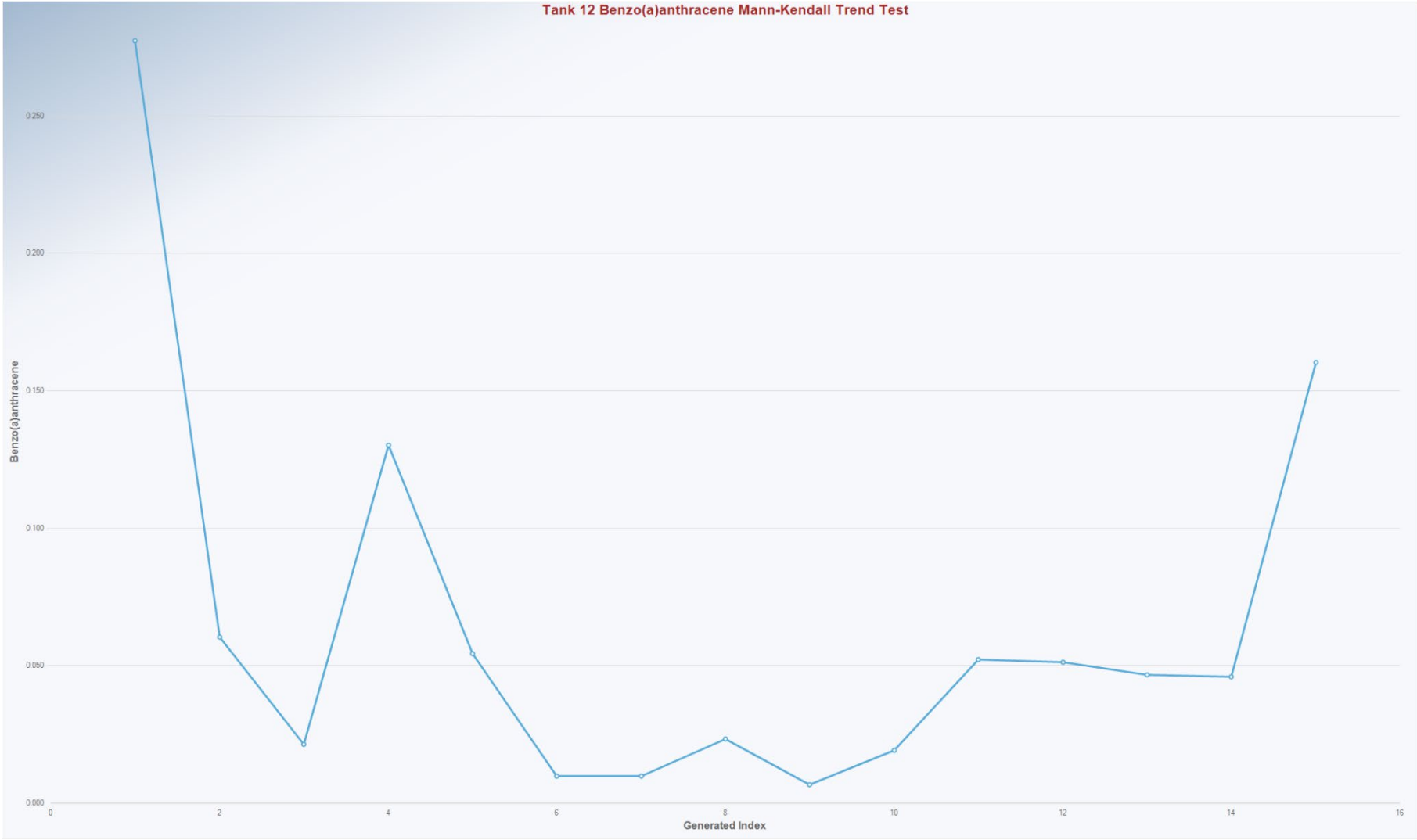
Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1163
Standardized Value of S	-1.0439
M-K Test Value (S)	-22
Tabulated p-value	0.1410
Approximate p-value	0.1483

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/27/2022 2:36:33 PM								
4	From File			Tank12_Benzo(a)anthracene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Benzo(a)anthracene											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			0.0064								
16	Maximum			0.277								
17	Mean			0.0643								
18	Geometric Mean			0.0383								
19	Median			0.0463								
20	Standard Deviation			0.0731								
21	Coefficient of Variation			1.137								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-12								
25	Tabulated p-value			0.279								
26	Standard Deviation of S			20.18								
27	Standardized Value of S			-0.545								
28	Approximate p-value			0.293								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 12 Benzo(a)anthracene Mann-Kendall Trend Test

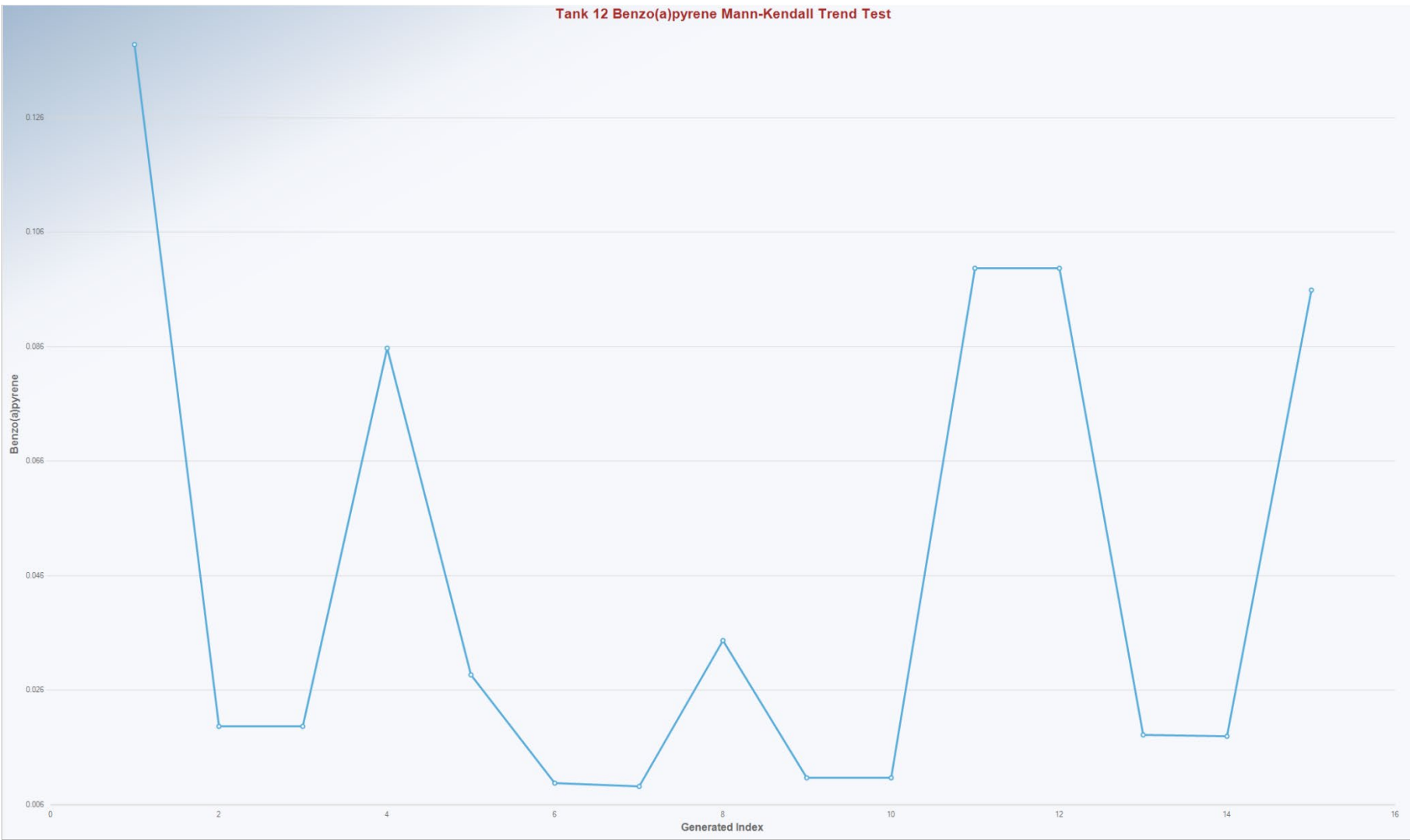


Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	-0.5450
M-K Test Value (S)	-12
Tabulated p-value	0.2790
Approximate p-value	0.2929

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 12 Benzo(a)pyrene Mann-Kendall Trend Test

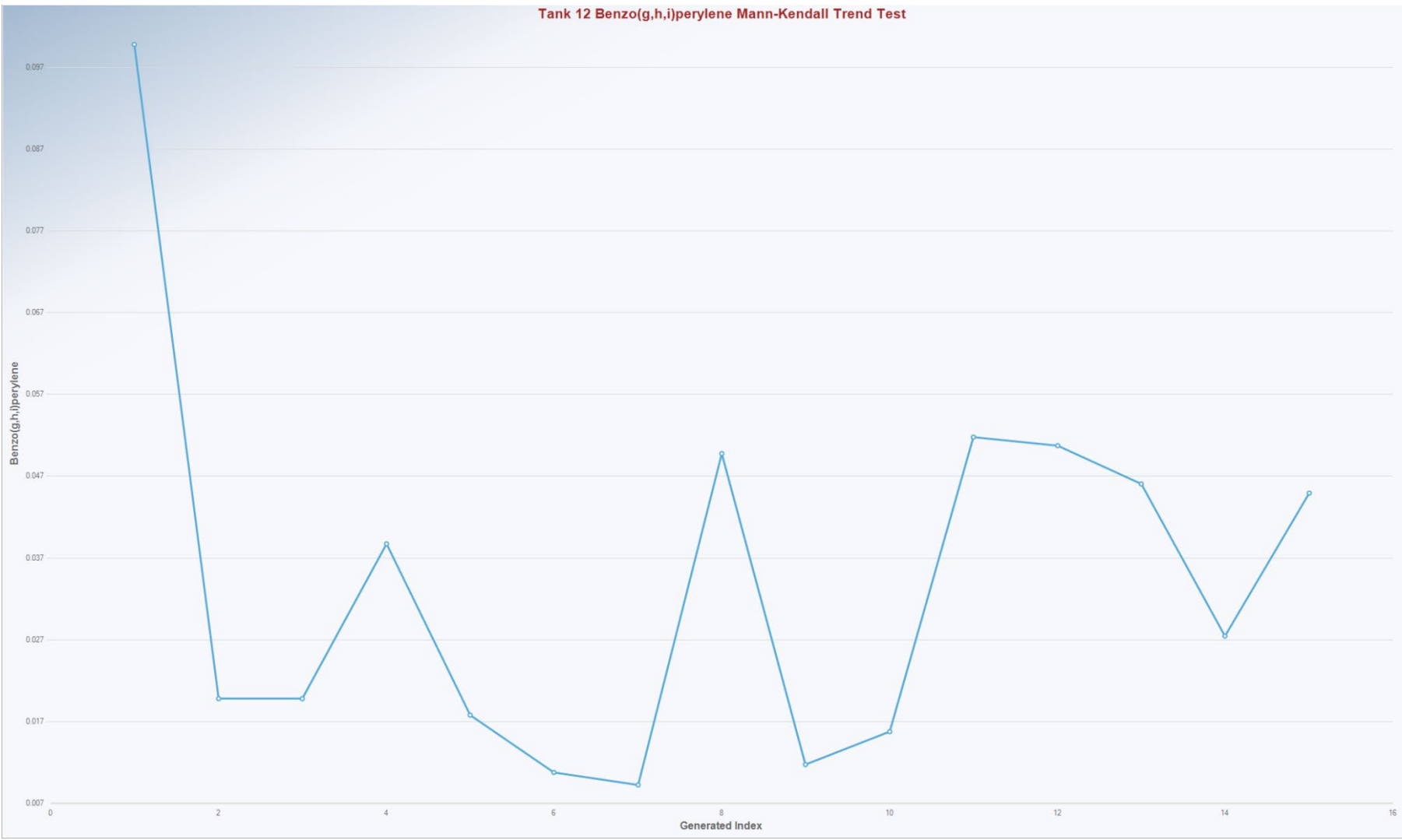


Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1329
Standardized Value of S	-0.0437
M-K Test Value (S)	-2
Tabulated p-value	0.4610
Approximate p-value	0.4802

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/27/2022 3:01:42 PM								
4	From File			Tank12_Benzo(g,h,i)perylene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Benzo(g,h,i)perylene											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			0.0095								
16	Maximum			0.1								
17	Mean			0.0345								
18	Geometric Mean			0.0277								
19	Median			0.0277								
20	Standard Deviation			0.0241								
21	Coefficient of Variation			0.699								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			6								
25	Tabulated p-value			0.385								
26	Standard Deviation of S			20.18								
27	Standardized Value of S			0.248								
28	Approximate p-value			0.402								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

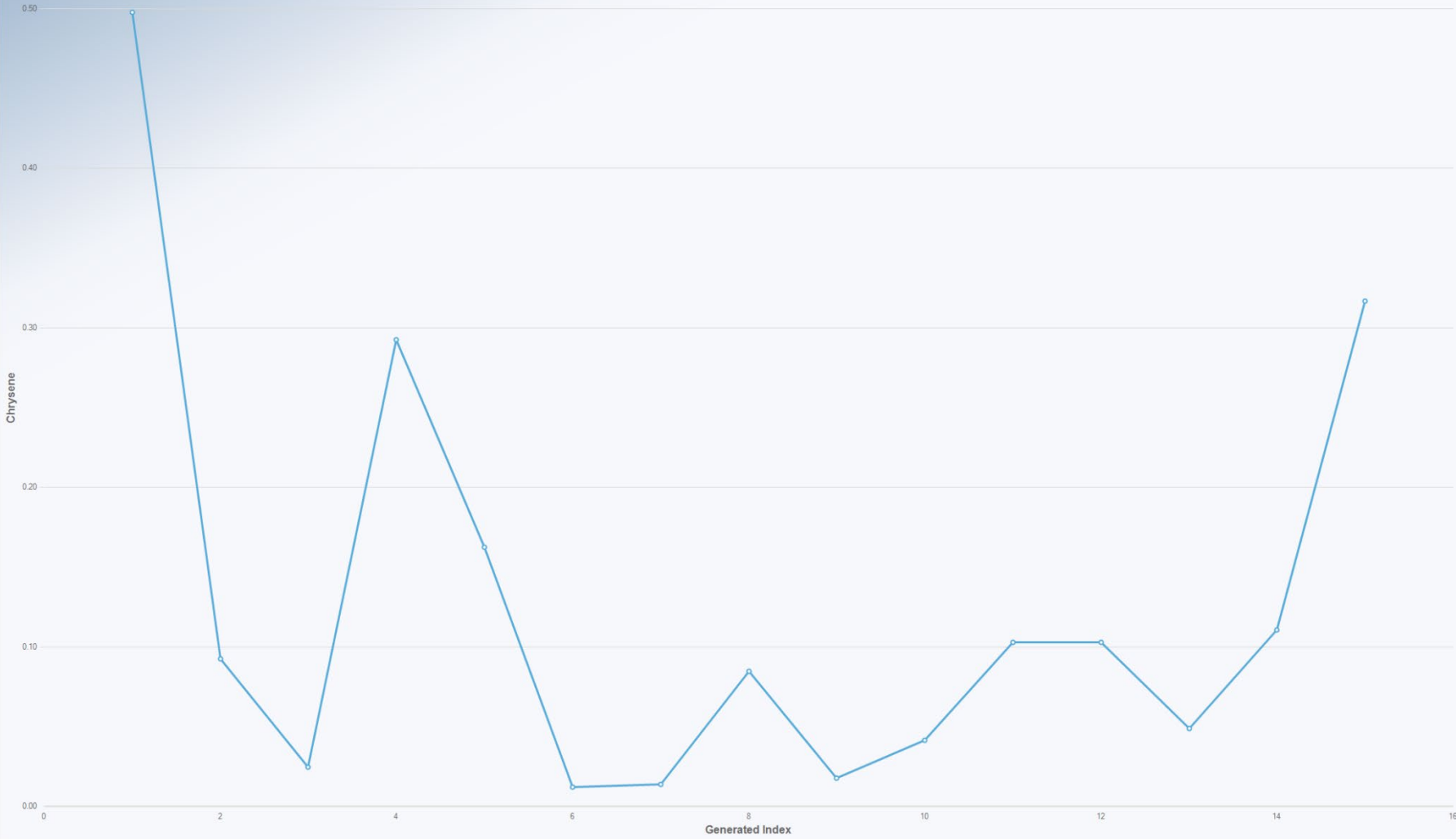
Tank 12 Benzo(g,h,i)perylene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	0.2477
M-K Test Value (S)	6
Tabulated p-value	0.3850
Approximate p-value	0.4022

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 12 Chrysene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	0.3468
M-K Test Value (S)	8
Tabulated p-value	0.3490
Approximate p-value	0.3644

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:09:43 AM								
4	From File			Tank12_DRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	DRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			280								
16	Maximum			2600								
17	Mean			1291								
18	Geometric Mean			1080								
19	Median			1170								
20	Standard Deviation			763.7								
21	Coefficient of Variation			0.592								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-34								
25	Tabulated p-value			0.046								
26	Standard Deviation of S			20.18								
27	Standardized Value of S			-1.635								
28	Approximate p-value			0.051								
29												
30	Statistically significant evidence of a decreasing											
31	trend at the specified level of significance.											

Tank 12 DRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	-1.6351
M-K Test Value (S)	-34
Tabulated p-value	0.0460
Approximate p-value	0.0510

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 12 Fluoranthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1163
Standardized Value of S	0.0497
M-K Test Value (S)	2
Tabulated p-value	0.4610
Approximate p-value	0.4802

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 12 Fluorene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	19.8997
Standardized Value of S	-0.4523
M-K Test Value (S)	-10
Tabulated p-value	0.3130
Approximate p-value	0.3255

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 12 Naphthalene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	19.7653
Standardized Value of S	-1.1637
M-K Test Value (S)	-24
Tabulated p-value	0.1200
Approximate p-value	0.1223

Insufficient statistical evidence of a significant trend at the specified level of significance.

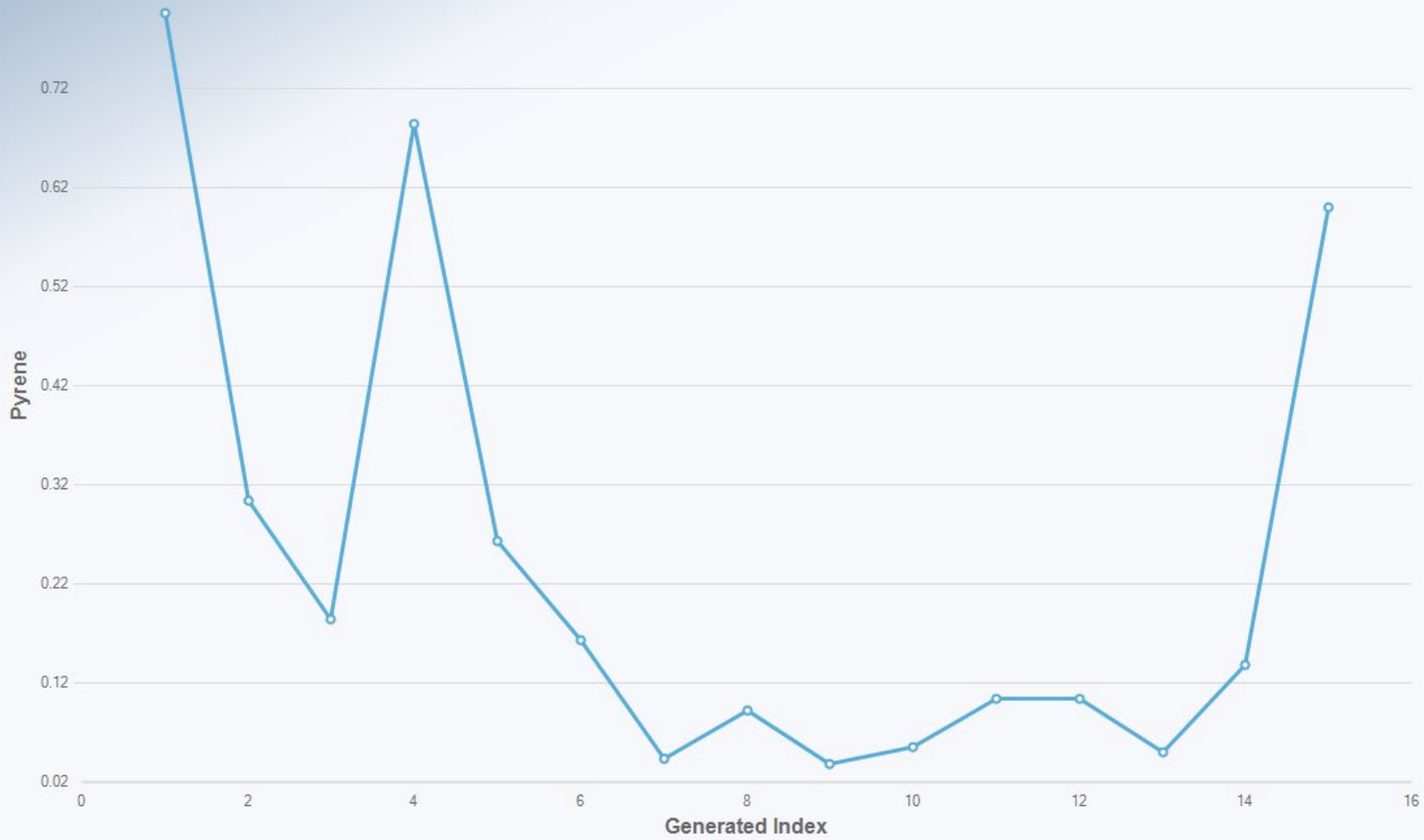
Tank 12 Phenanthrene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.0915
Standardized Value of S	0.1991
M-K Test Value (S)	5
Tabulated p-value	0.4230
Approximate p-value	0.4211

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 12 Pyrene Mann-Kendall Trend Test



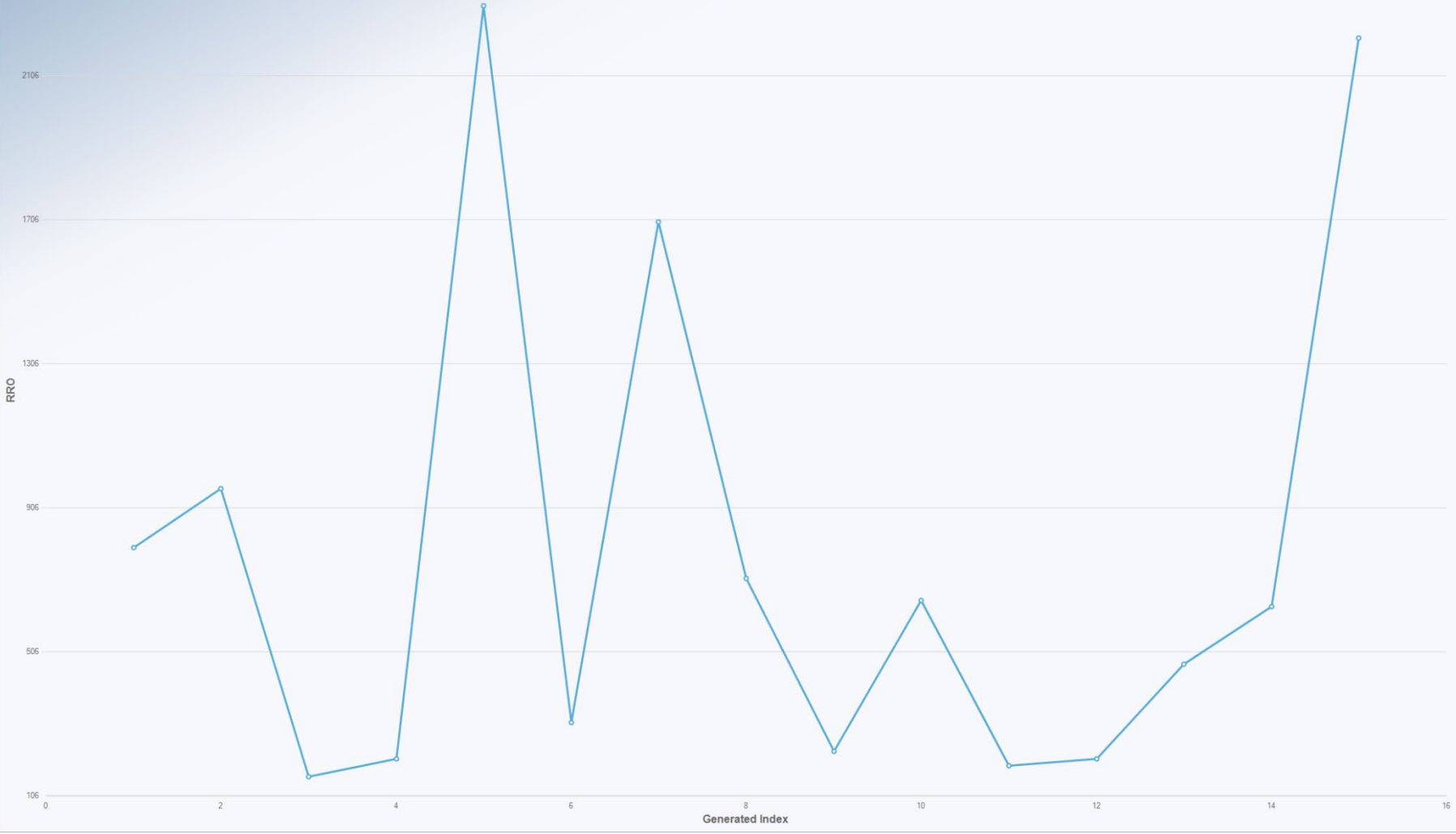
Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	-1.6351
M-K Test Value (S)	-34
Tabulated p-value	0.0460
Approximate p-value	0.0510

Statistically significant evidence of a decreasing trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:15:49 AM								
4	From File			Tank12_RRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	RRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			160								
16	Maximum			2300								
17	Mean			782.6								
18	Geometric Mean			536.1								
19	Median			632								
20	Standard Deviation			721								
21	Coefficient of Variation			0.921								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-2								
25	Tabulated p-value			0.461								
26	Standard Deviation of S			20.18								
27	Standardized Value of S			-0.0495								
28	Approximate p-value			0.48								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 12 RRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	-0.0495
M-K Test Value (S)	-2
Tabulated p-value	0.4610
Approximate p-value	0.4802

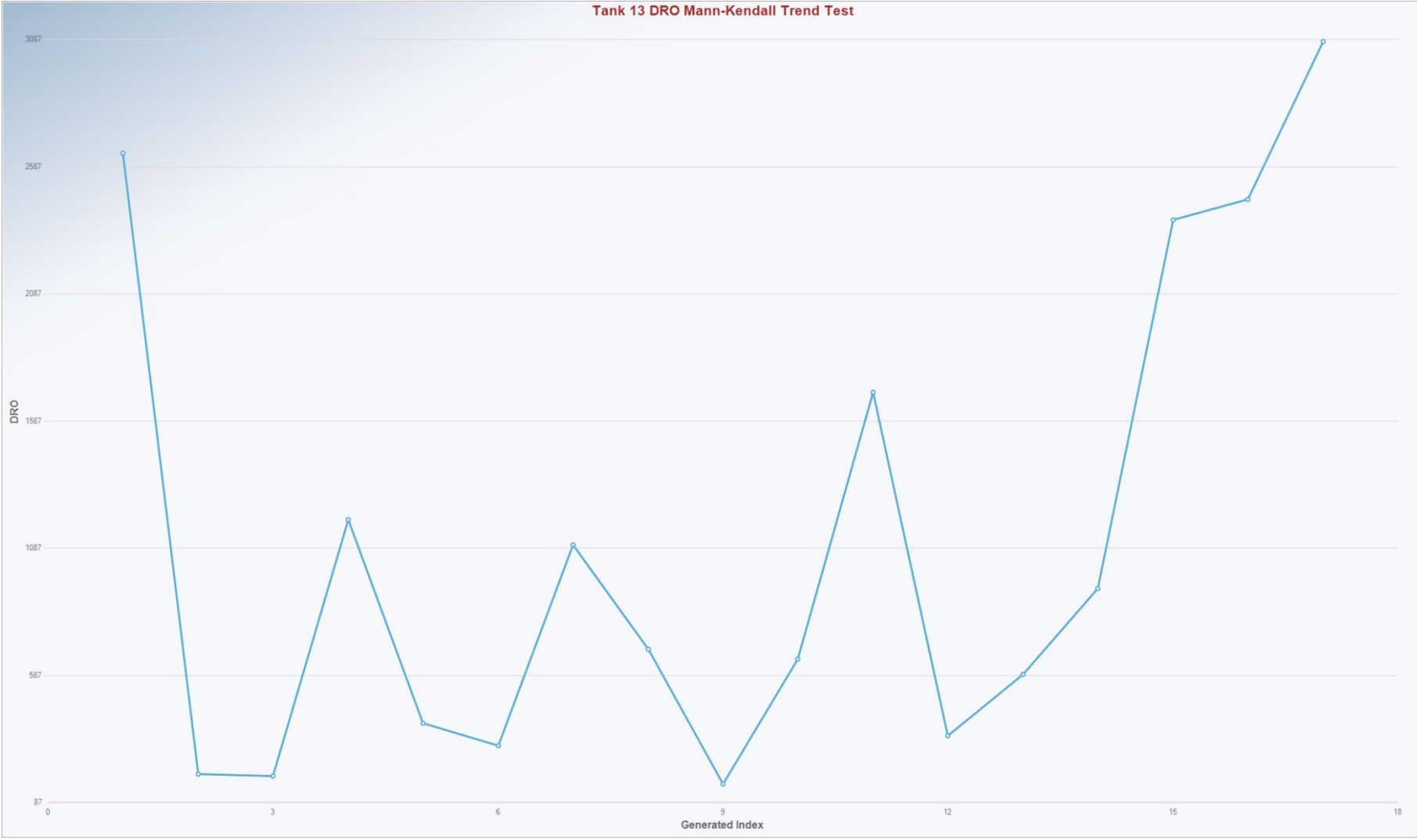
Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank Tunnel 13

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	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:17:20 AM								
4	From File			Tank13_DRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	DRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			17								
14	Number Values Reported (n)			17								
15	Minimum			160								
16	Maximum			3080								
17	Mean			1119								
18	Geometric Mean			746.5								
19	Median			690								
20	Standard Deviation			968.3								
21	Coefficient of Variation			0.865								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			44								
25	Tabulated p-value			0.038								
26	Standard Deviation of S			24.28								
27	Standardized Value of S			1.771								
28	Approximate p-value			0.0383								
29												
30	Statistically significant evidence of an increasing											
31	trend at the specified level of significance.											

Tank 13 DRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	17
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	24.2762
Standardized Value of S	1.7713
M-K Test Value (S)	44
Tabulated p-value	0.0380
Approximate p-value	0.0383

Statistically significant evidence of an increasing trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/28/2022 3:54:56 PM								
4	From File			Tank13_Naphthalene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Naphthalene											
10												
11	General Statistics											
12	Number of Reported Events Not Used			0								
13	Number of Generated Events			16								
14	Number Values Reported (n)			16								
15	Minimum			0.0096								
16	Maximum			0.52								
17	Mean			0.1								
18	Geometric Mean			0.0485								
19	Median			0.0411								
20	Standard Deviation			0.137								
21	Coefficient of Variation			1.364								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			25								
25	Tabulated p-value			0.153								
26	Standard Deviation of S			22.14								
27	Standardized Value of S			1.084								
28	Approximate p-value			0.139								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 13 Naphthalene Mann-Kendall Trend Test



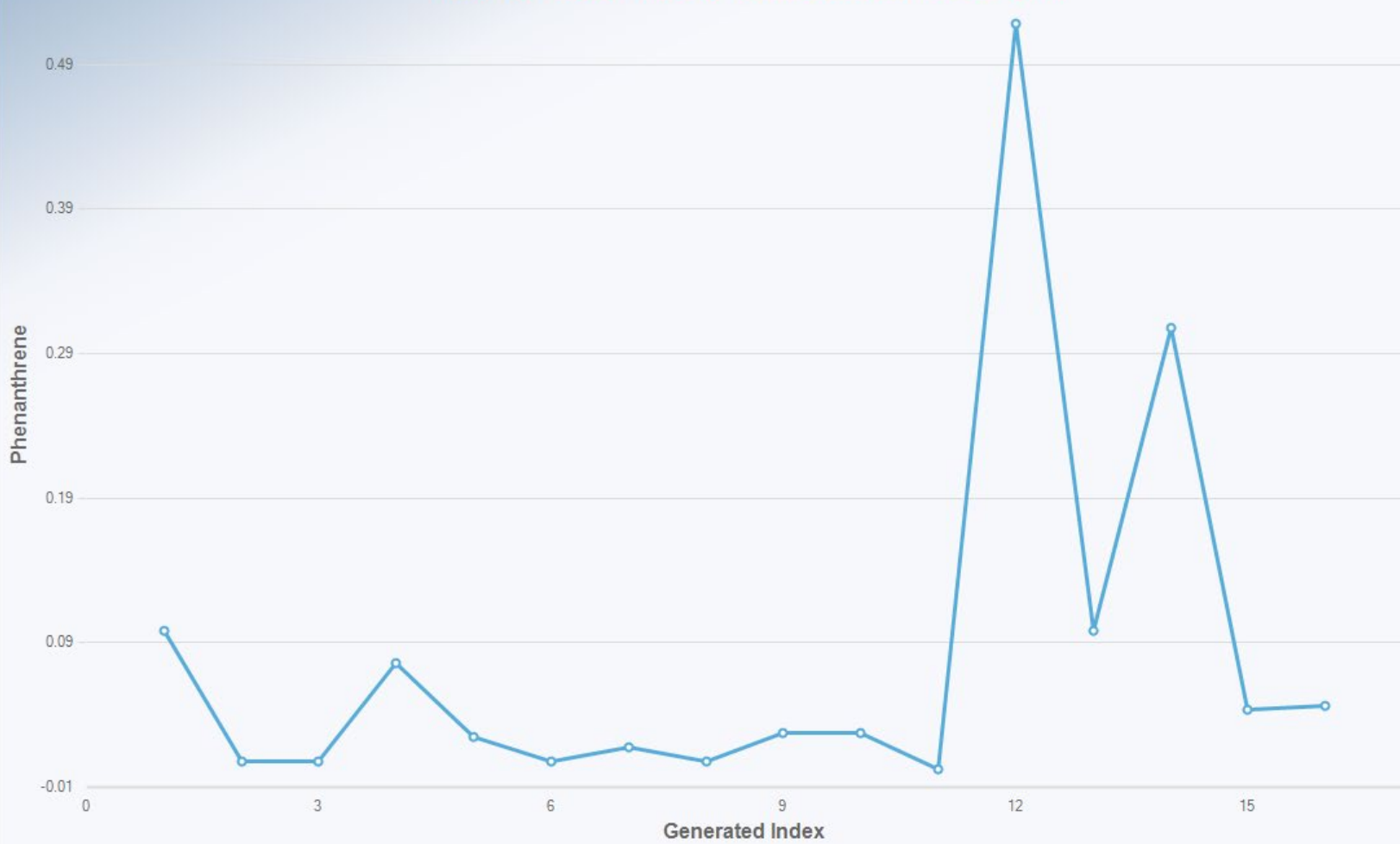
Mann-Kendall Trend Analysis

n	16
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	22.1435
Standardized Value of S	1.0838
M-K Test Value (S)	25
Tabulated p-value	0.1530
Approximate p-value	0.1392

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/28/2022 3:57:24 PM								
4	From File			Tank13_Phenanthrene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Phenanthrene											
10												
11	General Statistics											
12	Number of Reported Events Not Used			0								
13	Number of Generated Events			16								
14	Number Values Reported (n)			16								
15	Minimum			0.0047								
16	Maximum			0.52								
17	Mean			0.0844								
18	Geometric Mean			0.0351								
19	Median			0.029								
20	Standard Deviation			0.138								
21	Coefficient of Variation			1.636								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			26								
25	Tabulated p-value			0.133								
26	Standard Deviation of S			22.12								
27	Standardized Value of S			1.13								
28	Approximate p-value			0.129								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 13 Phenanthrene Mann-Kendall Trend Test



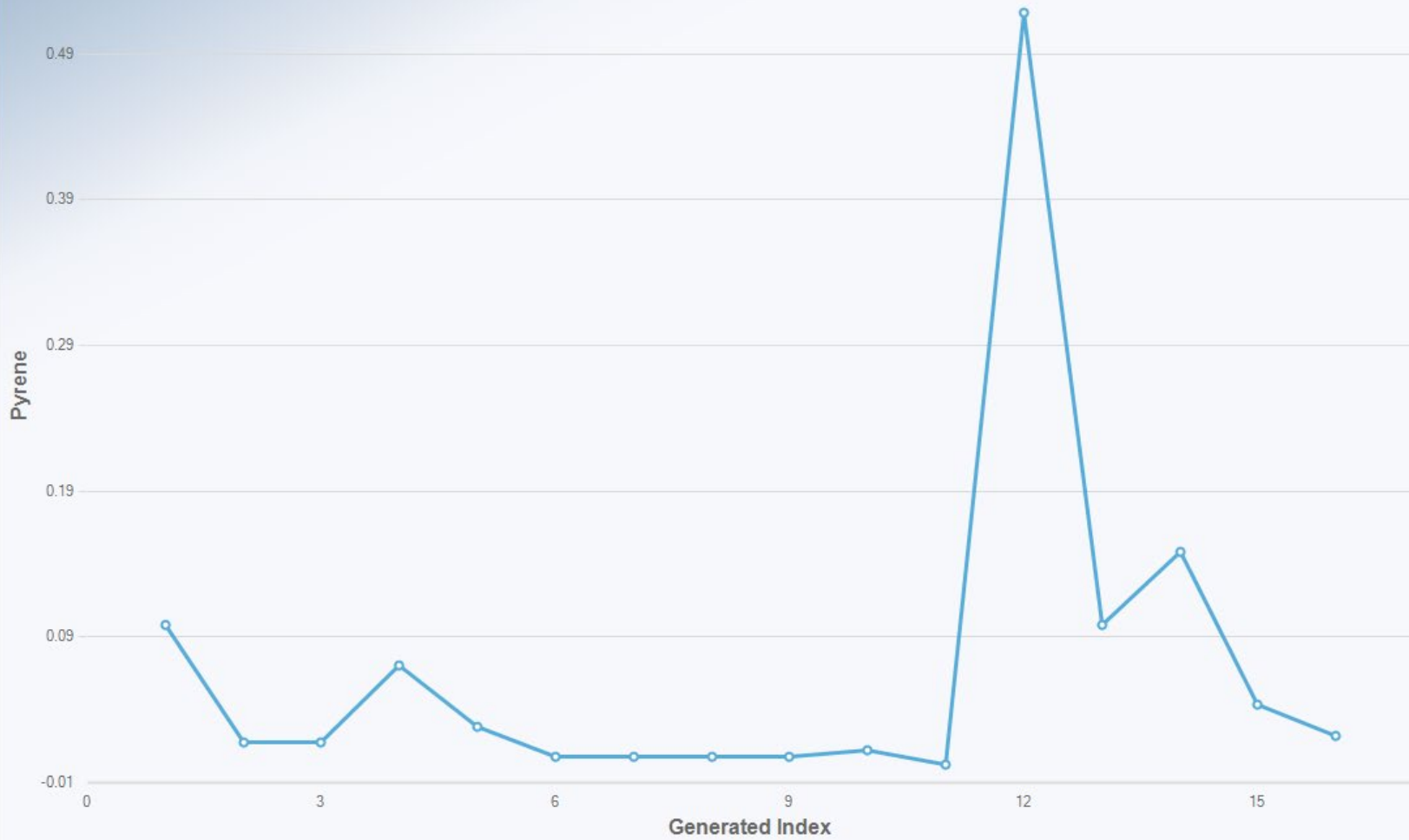
Mann-Kendall Trend Analysis

n	16
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	22.1209
Standardized Value of S	1.1302
M-K Test Value (S)	26
Tabulated p-value	0.1330
Approximate p-value	0.1292

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/28/2022 3:59:22 PM								
4	From File			Tank13_Pyrene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Pyrene											
10												
11	General Statistics											
12	Number of Reported Events Not Used			0								
13	Number of Generated Events			16								
14	Number Values Reported (n)			16								
15	Minimum			0.0047								
16	Maximum			0.52								
17	Mean			0.0712								
18	Geometric Mean			0.03								
19	Median			0.022								
20	Standard Deviation			0.127								
21	Coefficient of Variation			1.784								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			5								
25	Tabulated p-value			0.447								
26	Standard Deviation of S			22.14								
27	Standardized Value of S			0.181								
28	Approximate p-value			0.428								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 13 Pyrene Mann-Kendall Trend Test



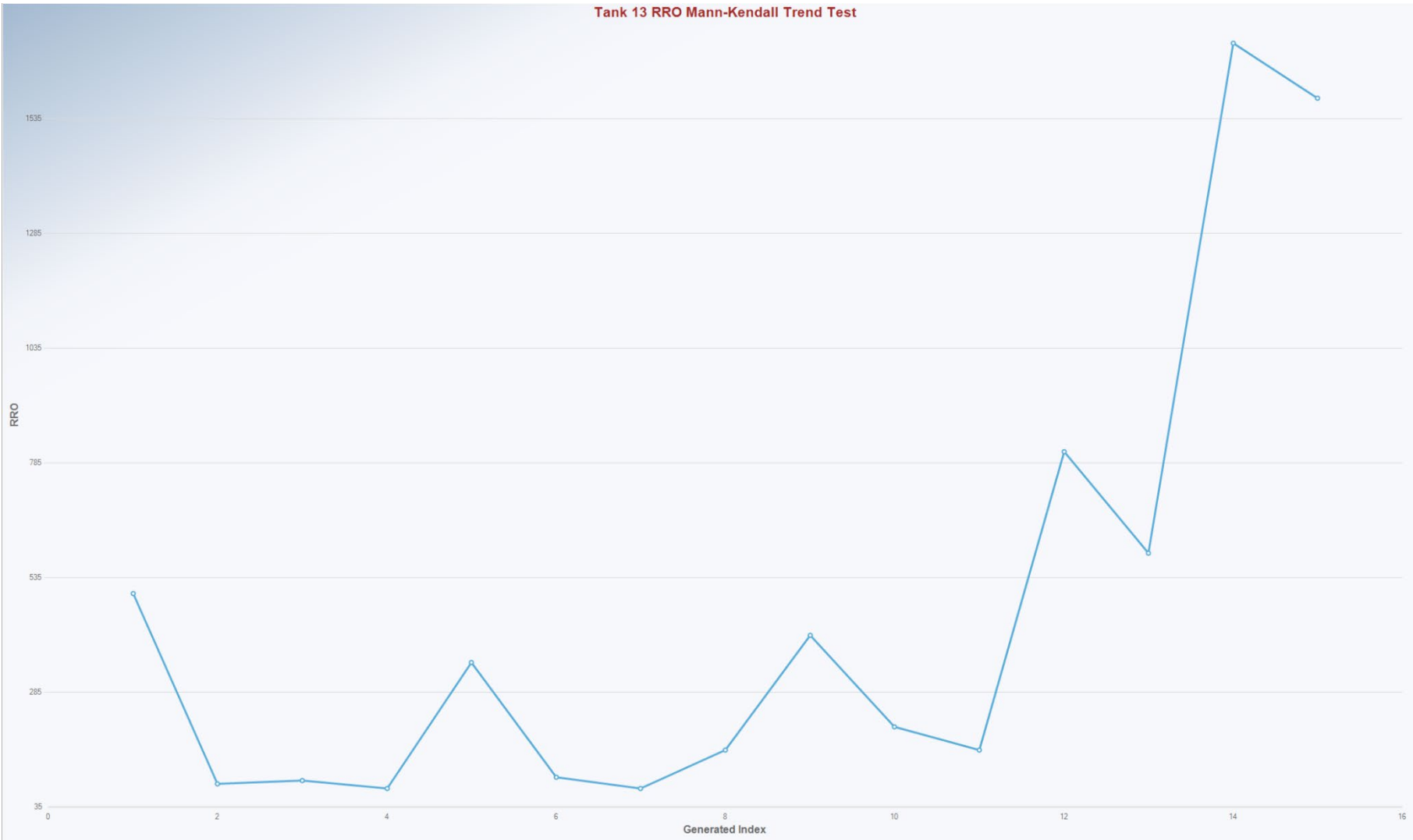
Mann-Kendall Trend Analysis

n	16
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	22.1435
Standardized Value of S	0.1806
M-K Test Value (S)	5
Tabulated p-value	0.4470
Approximate p-value	0.4283

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:19:05 AM								
4	From File			Tank13_RRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	RRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			76								
16	Maximum			1700								
17	Mean			460								
18	Geometric Mean			265.4								
19	Median			210								
20	Standard Deviation			527								
21	Coefficient of Variation			1.146								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			53								
25	Tabulated p-value			0.004								
26	Standard Deviation of S			20.16								
27	Standardized Value of S			2.58								
28	Approximate p-value			0.00494								
29												
30	Statistically significant evidence of an increasing											
31	trend at the specified level of significance.											

Tank 13 RRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1577
Standardized Value of S	2.5797
M-K Test Value (S)	53
Tabulated p-value	0.0040
Approximate p-value	0.0049

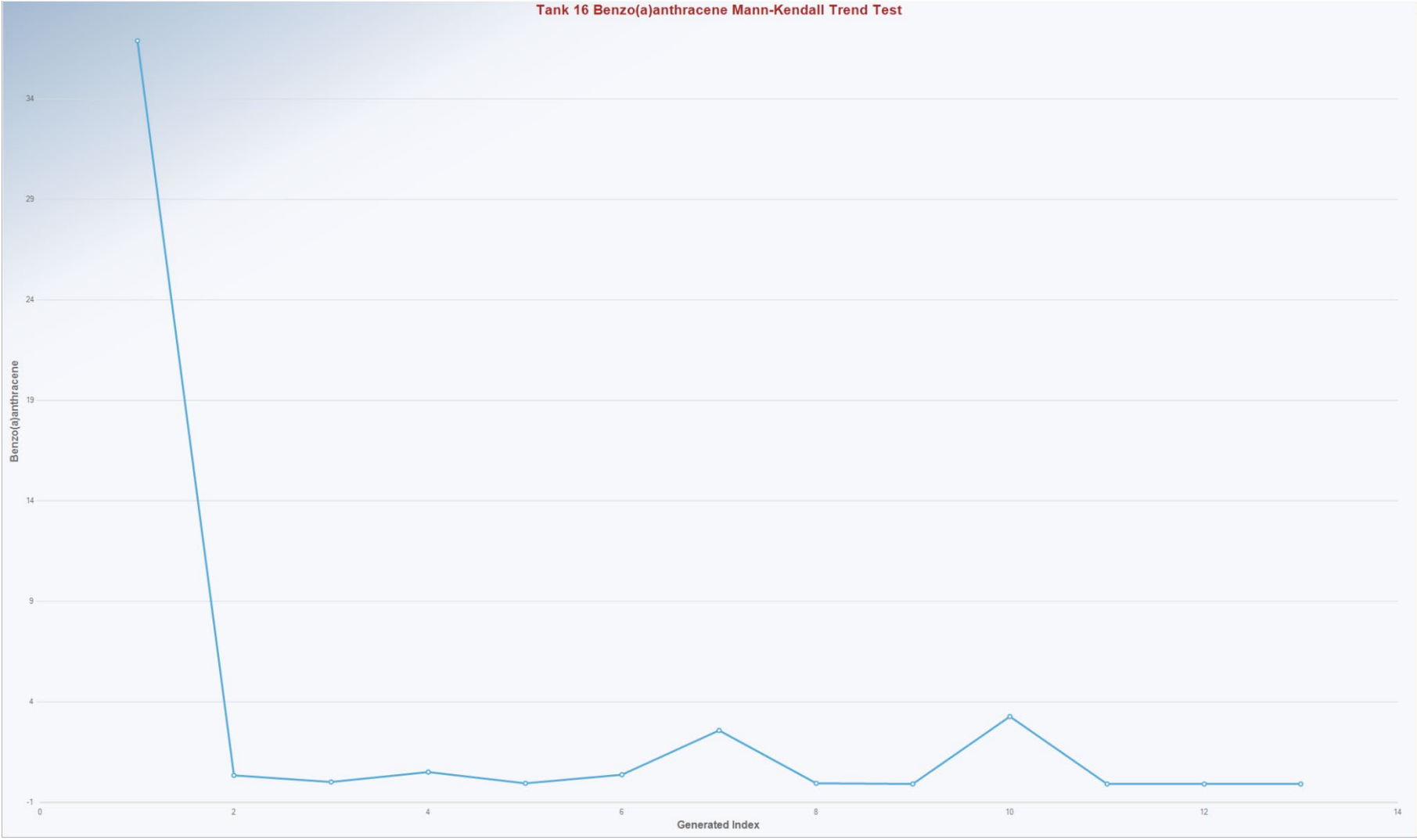
Statistically significant evidence of an increasing trend at the specified level of significance.

Tank Tunnel 16

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A	B	C	D	E	F	G	H	I	J	K	L
1			Mann-Kendall Trend Test Analysis								
2	User Selected Options										
3	Date/Time of Computation		ProUCL 5.2 9/26/2022 10:20:37 AM								
4	From File		Tank16_Benzo(a)anthracene_Inputs.xls								
5	Full Precision		OFF								
6	Confidence Coefficient		0.95								
7	Level of Significance		0.05								
8											
9	Benzo(a)anthracene										
10											
11	General Statistics										
12	Number or Reported Events Not Used		0								
13	Number of Generated Events		13								
14	Number Values Reported (n)		13								
15	Minimum		0.045								
16	Maximum		37								
17	Mean		3.477								
18	Geometric Mean		0.307								
19	Median		0.13								
20	Standard Deviation		10.13								
21	Coefficient of Variation		2.914								
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)		-40								
25	Tabulated p-value		0.007								
26	Standard Deviation of S		16.39								
27	Standardized Value of S		-2.379								
28	Approximate p-value		0.00867								
29											
30	Statistically significant evidence of a decreasing										
31	trend at the specified level of significance.										

Tank 16 Benzo(a)anthracene Mann-Kendall Trend Test



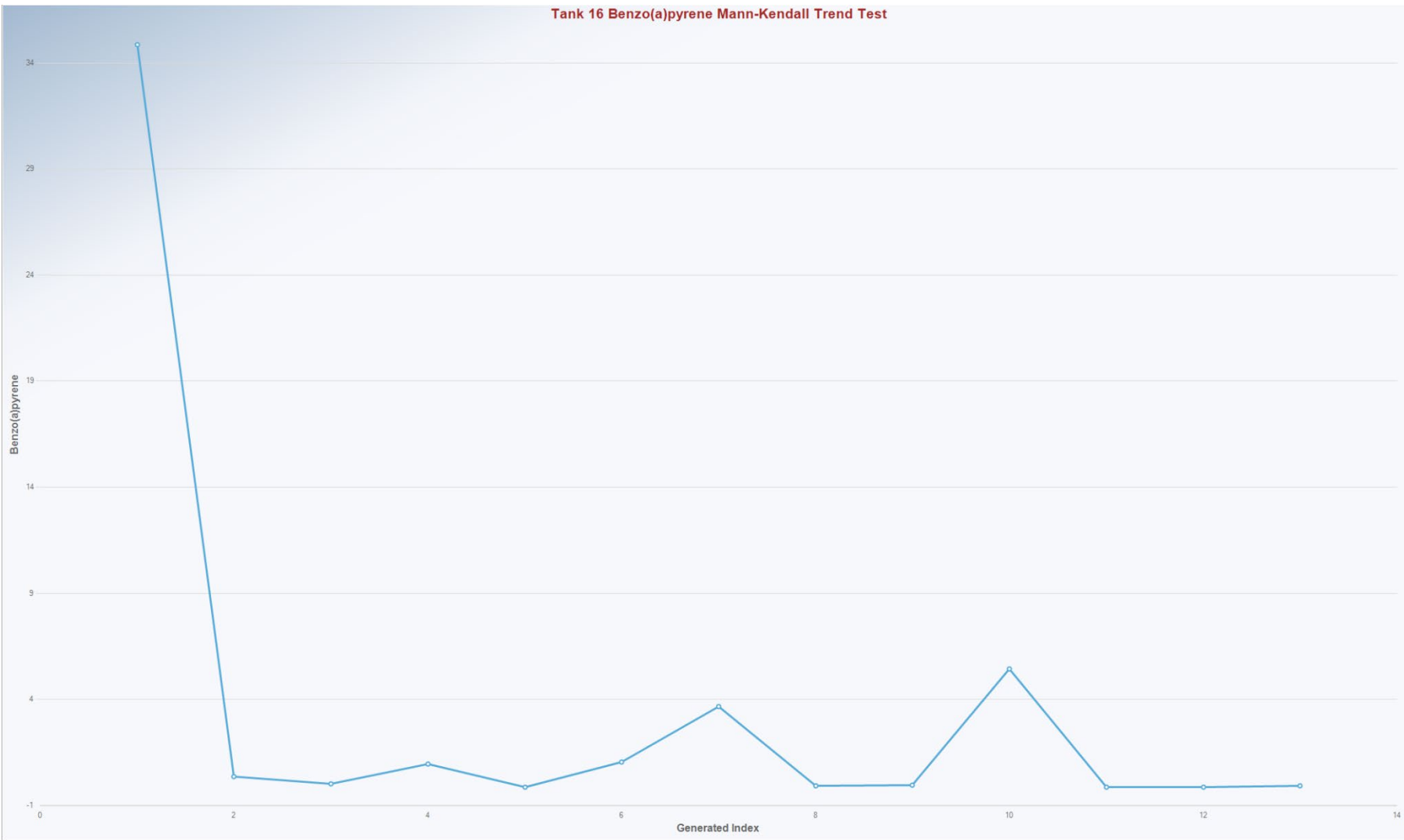
Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-2.3793
M-K Test Value (S)	-40
Tabulated p-value	0.0070
Approximate p-value	0.0087

Statistically significant evidence of a decreasing trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1			Mann-Kendall Trend Test Analysis								
2	User Selected Options										
3	Date/Time of Computation		ProUCL 5.2 9/26/2022 10:23:52 AM								
4	From File		Tank16_Benzo(a)pyrene_Inputs.xls								
5	Full Precision		OFF								
6	Confidence Coefficient		0.95								
7	Level of Significance		0.05								
8											
9	Benzo(a)pyrene										
10											
11	General Statistics										
12	Number or Reported Events Not Used		0								
13	Number of Generated Events		13								
14	Number Values Reported (n)		13								
15	Minimum		0.0182								
16	Maximum		35								
17	Mean		3.669								
18	Geometric Mean		0.322								
19	Median		0.18								
20	Standard Deviation		9.569								
21	Coefficient of Variation		2.608								
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)		-28								
25	Tabulated p-value		0.05								
26	Standard Deviation of S		16.39								
27	Standardized Value of S		-1.647								
28	Approximate p-value		0.0498								
29											
30	Statistically significant evidence of a decreasing										
31	trend at the specified level of significance.										

Tank 16 Benzo(a)pyrene Mann-Kendall Trend Test

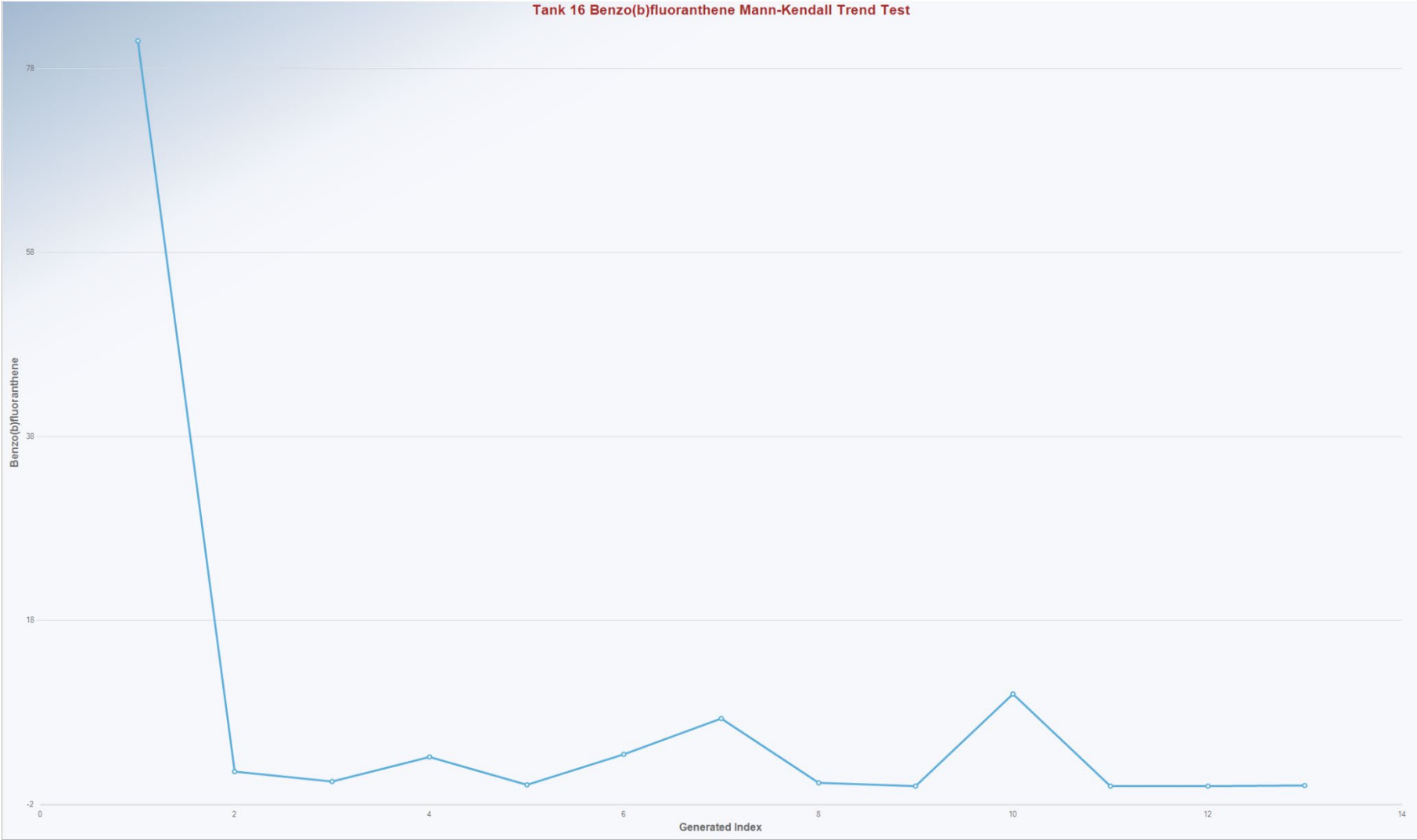


Mann-Kendall Trend Analysis	
n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-1.6472
M-K Test Value (S)	-28
Tabulated p-value	0.0500
Approximate p-value	0.0498

Statistically significant evidence of a decreasing trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1			Mann-Kendall Trend Test Analysis								
2	User Selected Options										
3	Date/Time of Computation		ProUCL 5.2 9/26/2022 10:28:02 AM								
4	From File		Tank16_Benzo(b)fluoranthene_Inputs.xls								
5	Full Precision		OFF								
6	Confidence Coefficient		0.95								
7	Level of Significance		0.05								
8											
9	Benzo(b)fluoranthene										
10											
11	General Statistics										
12	Number or Reported Events Not Used		0								
13	Number of Generated Events		13								
14	Number Values Reported (n)		13								
15	Minimum		0.023								
16	Maximum		81								
17	Mean		8.301								
18	Geometric Mean		0.722								
19	Median		0.5								
20	Standard Deviation		22.07								
21	Coefficient of Variation		2.659								
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)		-28								
25	Tabulated p-value		0.05								
26	Standard Deviation of S		16.39								
27	Standardized Value of S		-1.647								
28	Approximate p-value		0.0498								
29											
30	Statistically significant evidence of a decreasing										
31	trend at the specified level of significance.										

Tank 16 Benzo(b)fluoranthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-1.6472
M-K Test Value (S)	-28
Tabulated p-value	0.0500
Approximate p-value	0.0498

Statistically significant evidence of a decreasing trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis							
2	User Selected Options										
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:29:51 AM							
4	From File			Tank16_Benzo(g,h,i)perylene_Inputs.xls							
5	Full Precision			OFF							
6	Confidence Coefficient			0.95							
7	Level of Significance			0.05							
8											
9	Benzo(g,h,i)perylene										
10											
11	General Statistics										
12	Number or Reported Events Not Used			0							
13	Number of Generated Events			13							
14	Number Values Reported (n)			13							
15	Minimum			0.021							
16	Maximum			44							
17	Mean			4.66							
18	Geometric Mean			0.353							
19	Median			0.18							
20	Standard Deviation			12.05							
21	Coefficient of Variation			2.586							
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)			-20							
25	Tabulated p-value			0.126							
26	Standard Deviation of S			16.39							
27	Standardized Value of S			-1.159							
28	Approximate p-value			0.123							
29											
30	Insufficient evidence to identify a significant										
31	trend at the specified level of significance.										

Tank 16 Benzo(g,h,i)perylene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-1.1582
M-K Test Value (S)	-20
Tabulated p-value	0.1260
Approximate p-value	0.1232

Insufficient statistical evidence of a significant trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1			Mann-Kendall Trend Test Analysis								
2	User Selected Options										
3	Date/Time of Computation		ProUCL 5.2 9/26/2022 10:31:43 AM								
4	From File		Tank16_Benzo(k)fluoranthene_Inputs.xls								
5	Full Precision		OFF								
6	Confidence Coefficient		0.95								
7	Level of Significance		0.05								
8											
9	Benzo(k)fluoranthene										
10											
11	General Statistics										
12	Number or Reported Events Not Used		0								
13	Number of Generated Events		13								
14	Number Values Reported (n)		13								
15	Minimum		0.034								
16	Maximum		23								
17	Mean		2.457								
18	Geometric Mean		0.332								
19	Median		0.21								
20	Standard Deviation		6.255								
21	Coefficient of Variation		2.546								
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)		-38								
25	Tabulated p-value		0.011								
26	Standard Deviation of S		16.39								
27	Standardized Value of S		-2.257								
28	Approximate p-value		0.012								
29											
30	Statistically significant evidence of a decreasing										
31	trend at the specified level of significance.										

Tank 16 Benzo(k)fluoranthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-2.2573
M-K Test Value (S)	-38
Tabulated p-value	0.0110
Approximate p-value	0.0120

Statistically significant evidence of a decreasing trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1			Mann-Kendall Trend Test Analysis								
2	User Selected Options										
3	Date/Time of Computation		ProUCL 5.2 9/26/2022 10:33:33 AM								
4	From File		Tank16_Chrysene_Inputs.xls								
5	Full Precision		OFF								
6	Confidence Coefficient		0.95								
7	Level of Significance		0.05								
8											
9	Chrysene										
10											
11	General Statistics										
12	Number or Reported Events Not Used		0								
13	Number of Generated Events		13								
14	Number Values Reported (n)		13								
15	Minimum		0.018								
16	Maximum		35								
17	Mean		3.643								
18	Geometric Mean		0.396								
19	Median		0.27								
20	Standard Deviation		9.537								
21	Coefficient of Variation		2.618								
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)		-33								
25	Tabulated p-value		0.029								
26	Standard Deviation of S		16.36								
27	Standardized Value of S		-1.956								
28	Approximate p-value		0.0252								
29											
30	Statistically significant evidence of a decreasing										
31	trend at the specified level of significance.										

Tank 16 Chrysene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3605
Standardized Value of S	-1.9559
M-K Test Value (S)	-33
Tabulated p-value	0.0290
Approximate p-value	0.0252

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 16 Dibenzo(a,h)anthracene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3511
Standardized Value of S	-1.8913
M-K Test Value (S)	-32
Tabulated p-value	0.0290
Approximate p-value	0.0293

Statistically significant evidence of a decreasing trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:36:32 AM								
4	From File			Tank16_DRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	DRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			13								
14	Number Values Reported (n)			13								
15	Minimum			2200								
16	Maximum			220000								
17	Mean			22108								
18	Geometric Mean			6484								
19	Median			4900								
20	Standard Deviation			59544								
21	Coefficient of Variation			2.693								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-44								
25	Tabulated p-value			0.003								
26	Standard Deviation of S			16.39								
27	Standardized Value of S			-2.623								
28	Approximate p-value			0.00435								
29												
30	Statistically significant evidence of a decreasing											
31	trend at the specified level of significance.											

Tank 16 DRO Mann-Kendall Trend Test

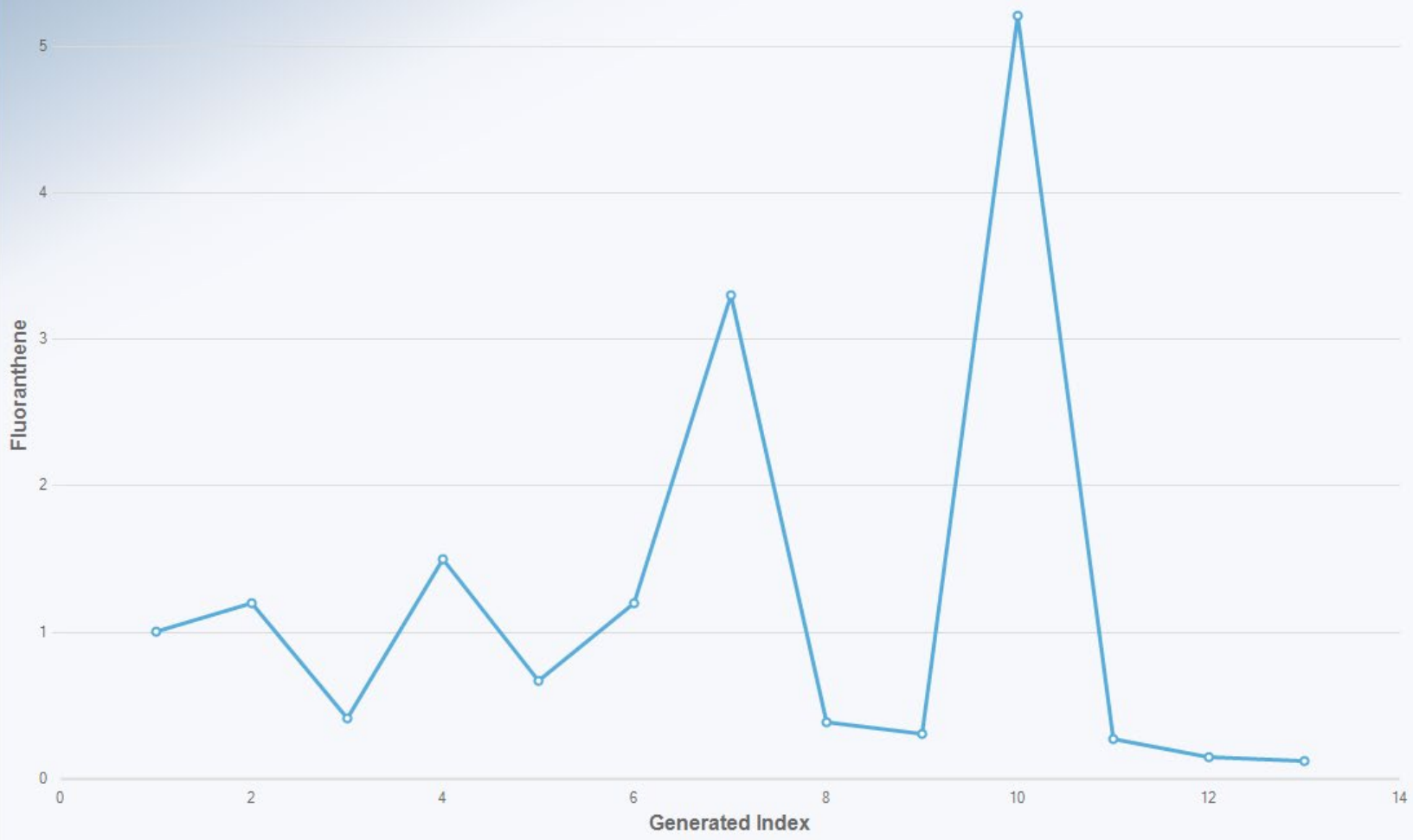


Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-2.6234
M-K Test Value (S)	-44
Tabulated p-value	0.0030
Approximate p-value	0.0044

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 16 Fluoranthene Mann-Kendall Trend Test

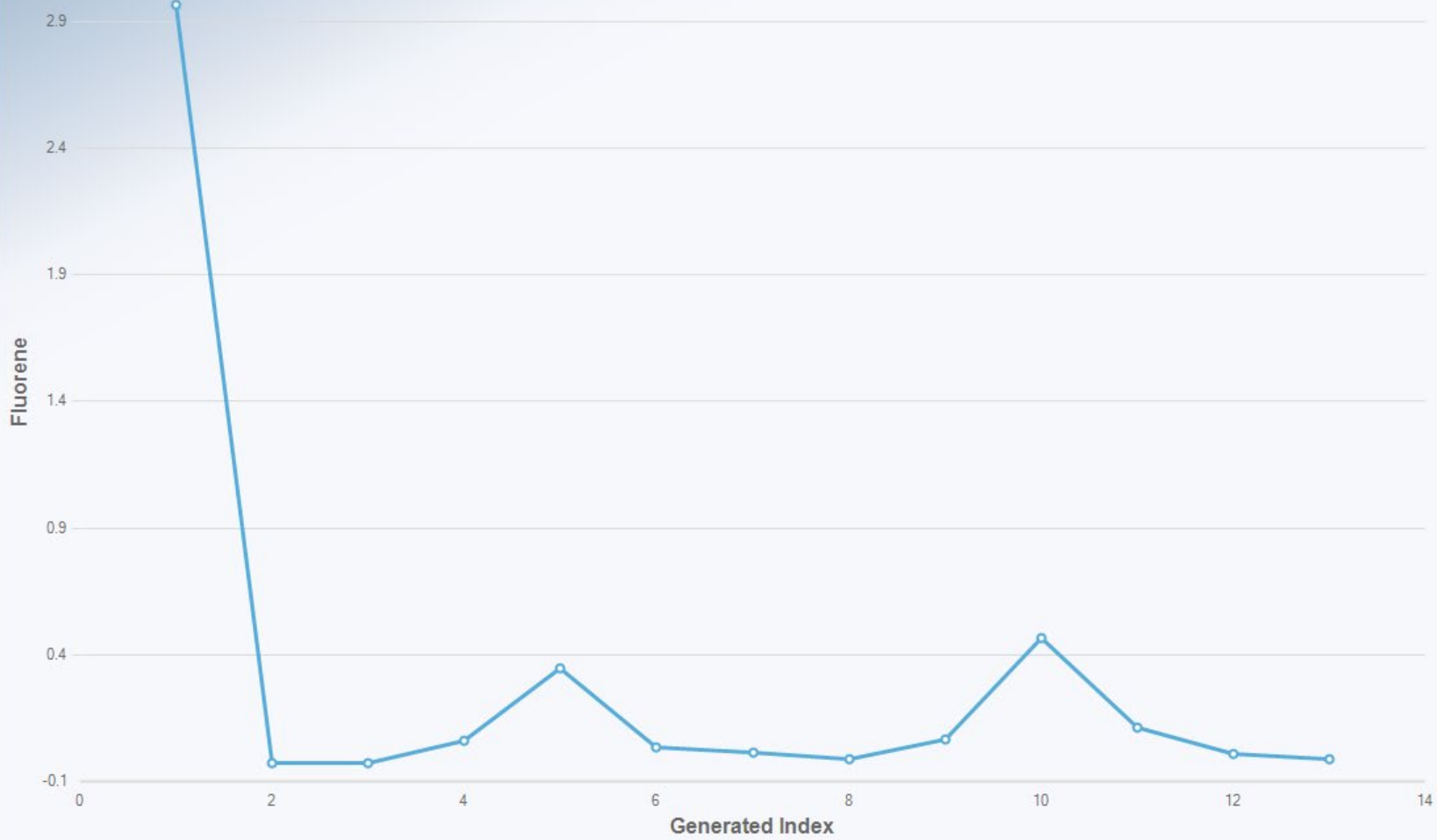


Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3605
Standardized Value of S	-1.8337
M-K Test Value (S)	-31
Tabulated p-value	0.0380
Approximate p-value	0.0334

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 16 Fluorene Mann-Kendall Trend Test



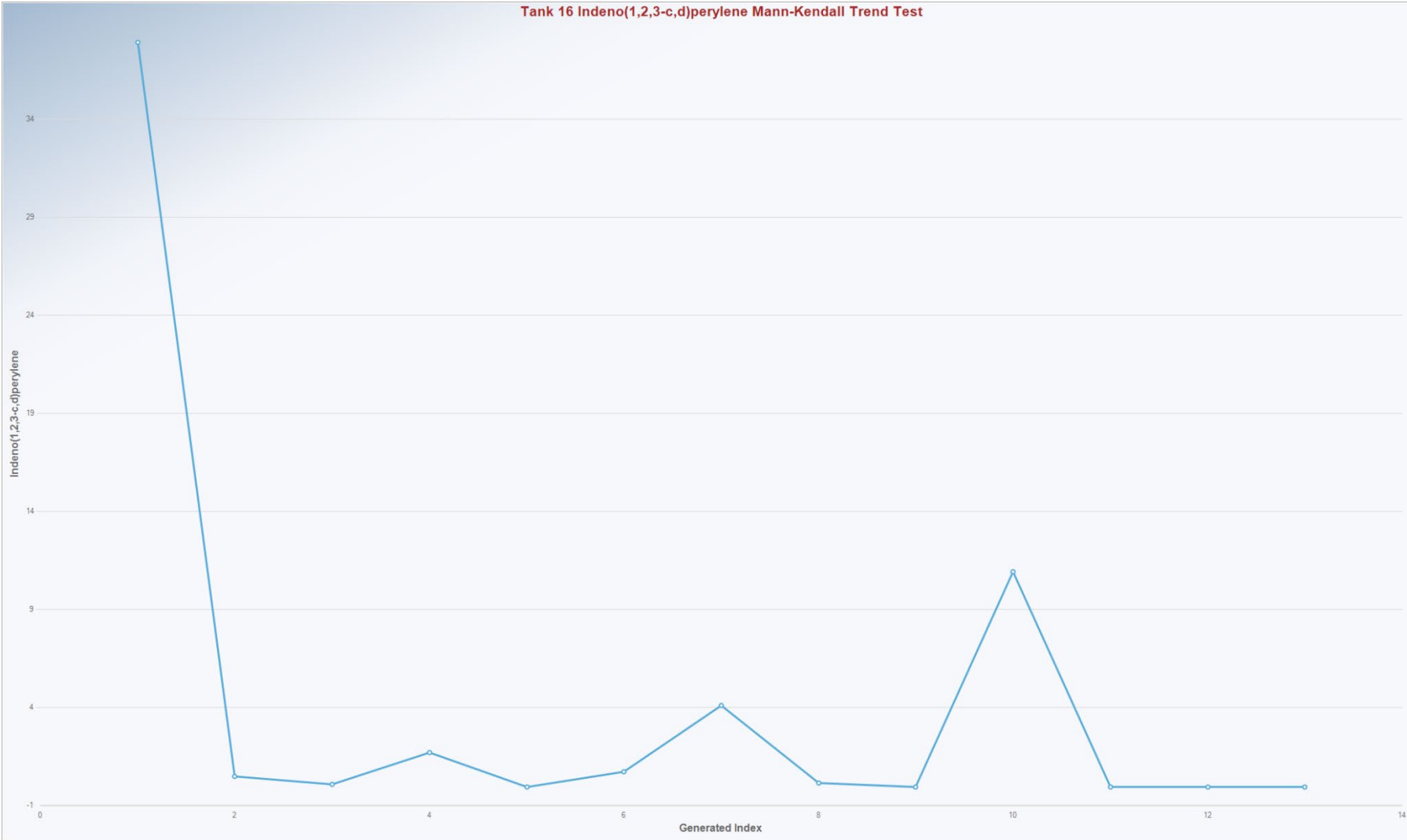
Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3605
Standardized Value of S	-0.1222
M-K Test Value (S)	-3
Tabulated p-value	0.4760
Approximate p-value	0.4514

Insufficient statistical evidence of a significant trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis							
2	User Selected Options										
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:38:01 AM							
4	From File			Tank16_Indeno(1,2,3-c,d)perylene_Inputs.xls							
5	Full Precision			OFF							
6	Confidence Coefficient			0.95							
7	Level of Significance			0.05							
8											
9	Indeno(1,2,3-c,d)perylene										
10											
11	General Statistics										
12	Number or Reported Events Not Used			0							
13	Number of Generated Events			13							
14	Number Values Reported (n)			13							
15	Minimum			0.037							
16	Maximum			38							
17	Mean			4.388							
18	Geometric Mean			0.417							
19	Median			0.25							
20	Standard Deviation			10.55							
21	Coefficient of Variation			2.405							
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)			-30							
25	Tabulated p-value			0.038							
26	Standard Deviation of S			16.39							
27	Standardized Value of S			-1.769							
28	Approximate p-value			0.0384							
29											
30	Statistically significant evidence of a decreasing										
31	trend at the specified level of significance.										

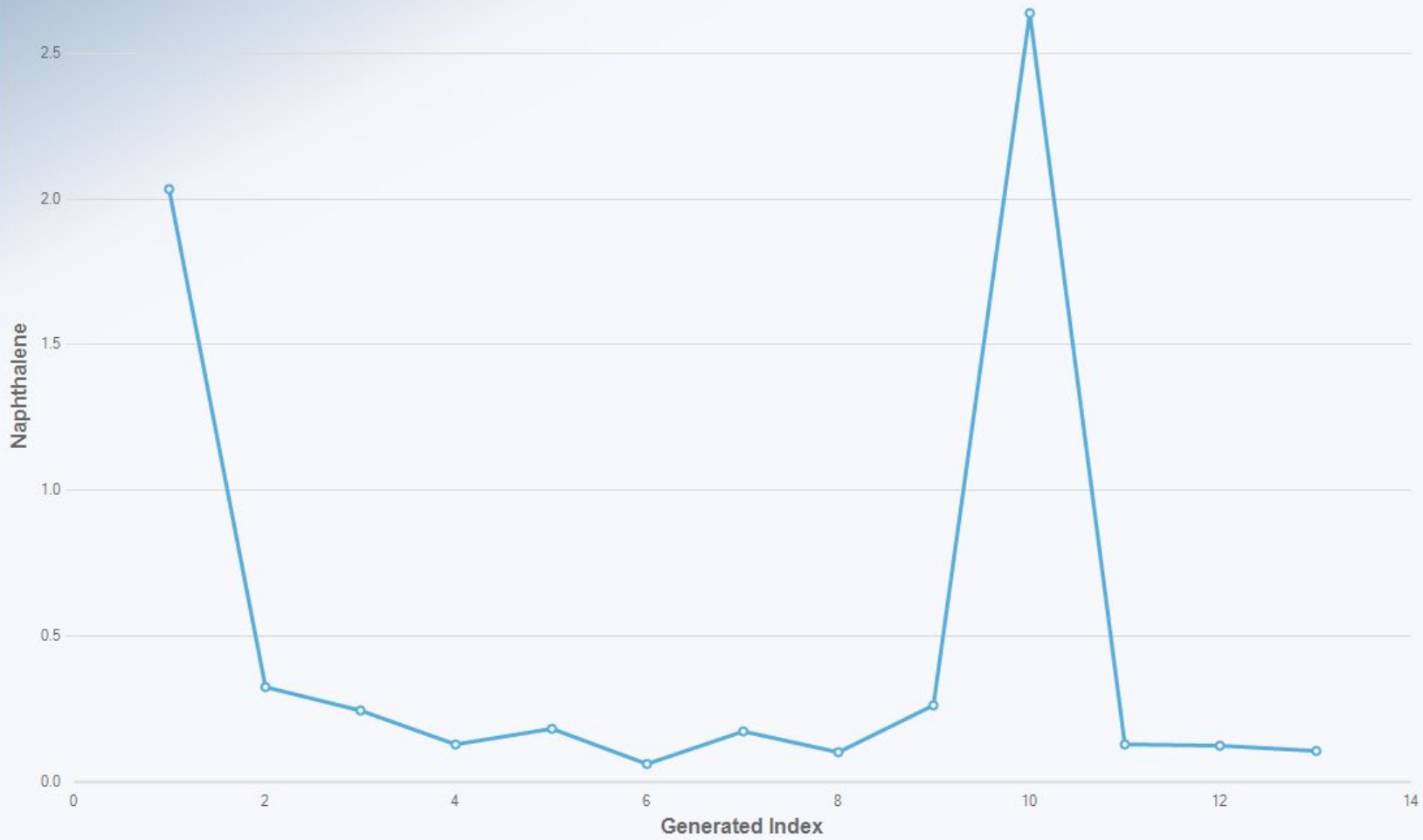
Tank 16 Indeno(1,2,3-c,d)perylene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-1.7693
M-K Test Value (S)	-30
Tabulated p-value	0.0380
Approximate p-value	0.0384

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 16 Naphthalene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-1.6472
M-K Test Value (S)	-28
Tabulated p-value	0.0500
Approximate p-value	0.0498

Statistically significant evidence of a decreasing trend at the specified level of significance.

Tank 16 Pyrene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	-1.7693
M-K Test Value (S)	-30
Tabulated p-value	0.0380
Approximate p-value	0.0384

Statistically significant evidence of a decreasing trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:39:39 AM								
4	From File			Tank16_RRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	RRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			11								
14	Number Values Reported (n)			11								
15	Minimum			430								
16	Maximum			56000								
17	Mean			6136								
18	Geometric Mean			1505								
19	Median			1090								
20	Standard Deviation			16545								
21	Coefficient of Variation			2.696								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-21								
25	Tabulated p-value			0.06								
26	Standard Deviation of S			12.85								
27	Standardized Value of S			-1.557								
28	Approximate p-value			0.0597								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 16 RRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	11
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	12.8452
Standardized Value of S	-1.5570
M-K Test Value (S)	-21
Tabulated p-value	0.0600
Approximate p-value	0.0597

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank Tunnel 17

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Tank 17 Acenaphthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	0.0990
M-K Test Value (S)	3
Tabulated p-value	0.4610
Approximate p-value	0.4606

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Acenaphthylene Mann-Kendall Trend Test

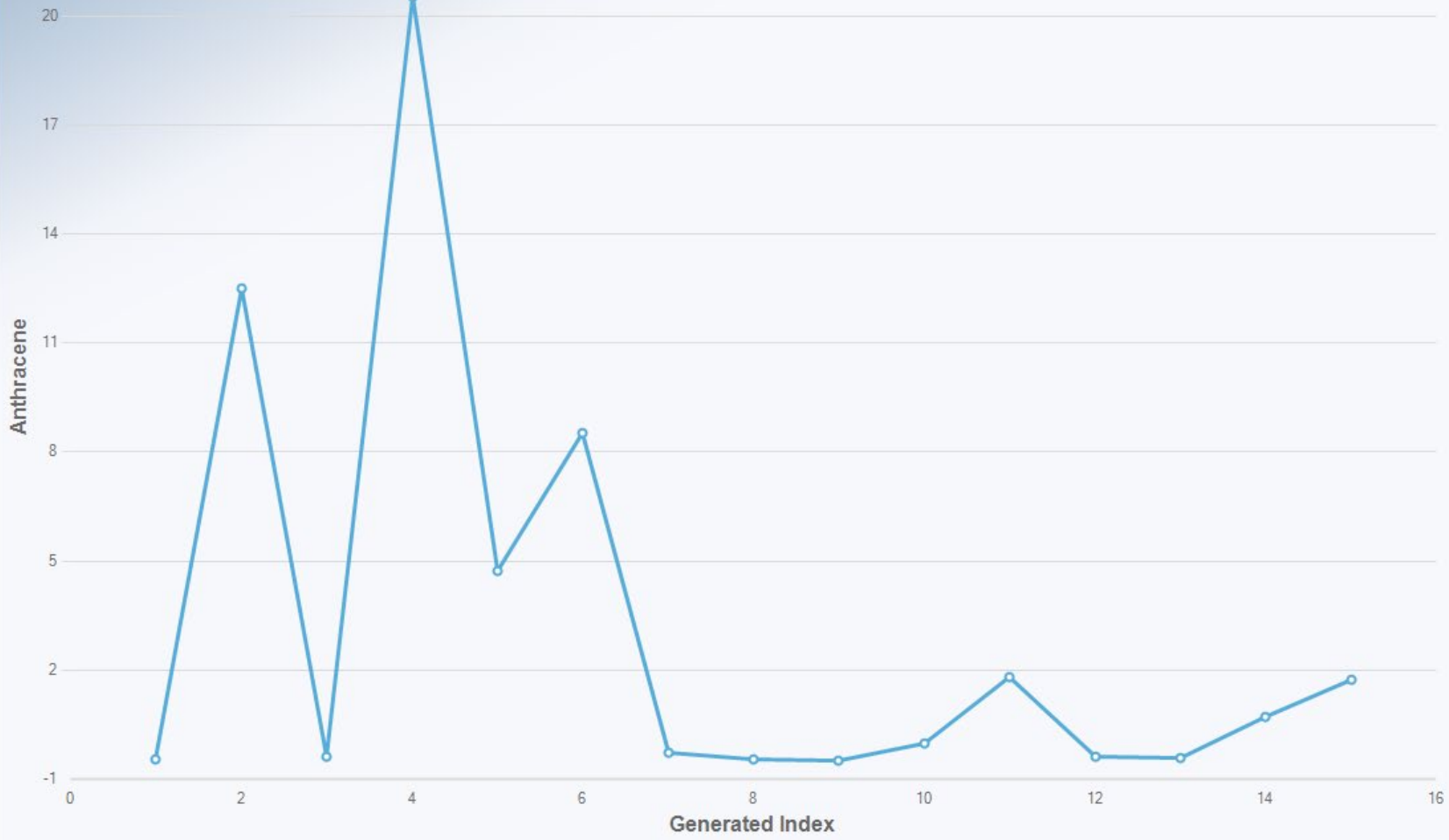


Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	0.8908
M-K Test Value (S)	19
Tabulated p-value	0.1900
Approximate p-value	0.1865

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Anthracene Mann-Kendall Trend Test



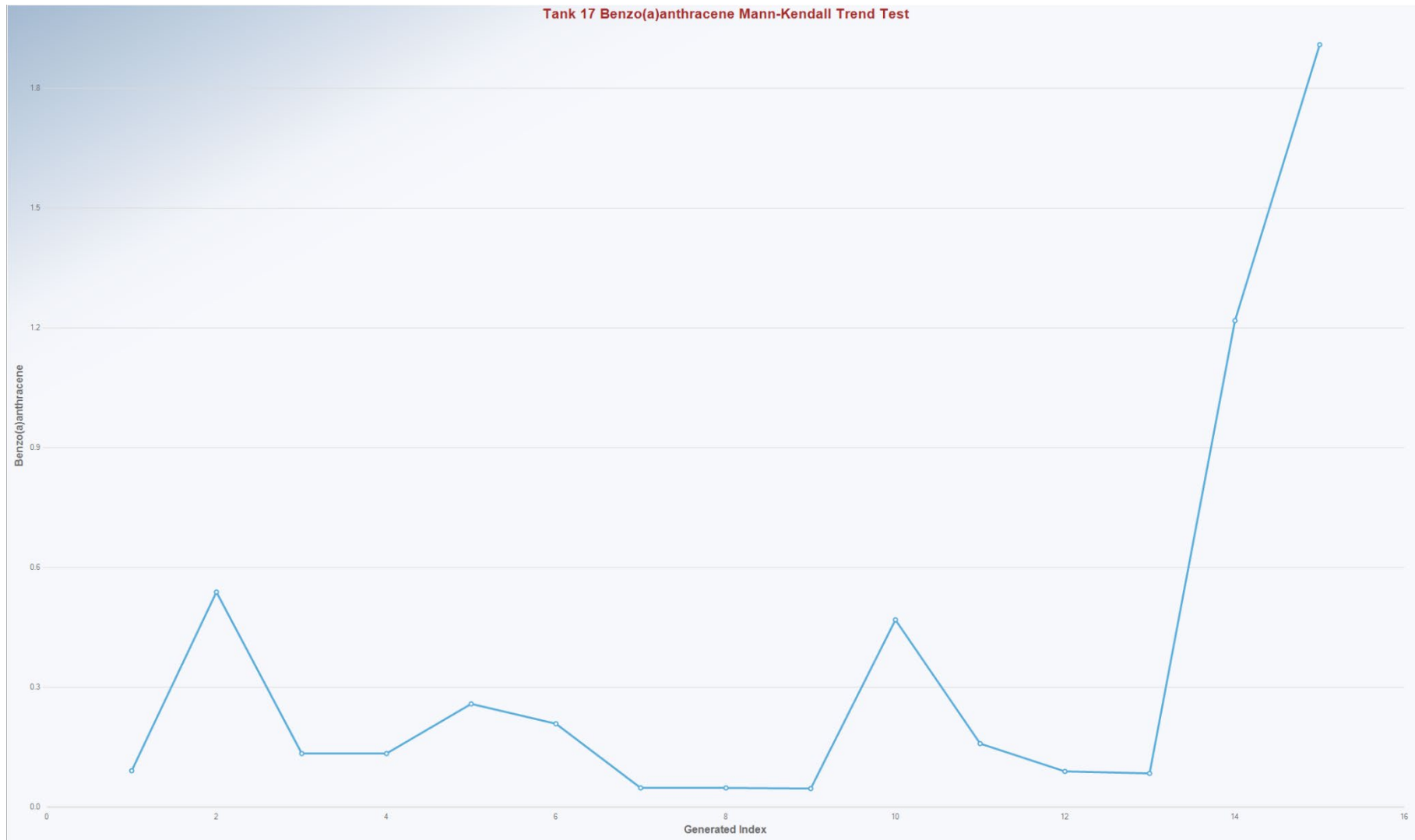
Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	-0.3959
M-K Test Value (S)	-9
Tabulated p-value	0.3490
Approximate p-value	0.3461

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:45:28 AM								
4	From File			Tank17_Benzo(a)anthracene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Benzo(a)anthracene											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			0.0079								
16	Maximum			1.87								
17	Mean			0.324								
18	Geometric Mean			0.104								
19	Median			0.096								
20	Standard Deviation			0.526								
21	Coefficient of Variation			1.624								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			11								
25	Tabulated p-value			0.313								
26	Standard Deviation of S			20.21								
27	Standardized Value of S			0.495								
28	Approximate p-value			0.31								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

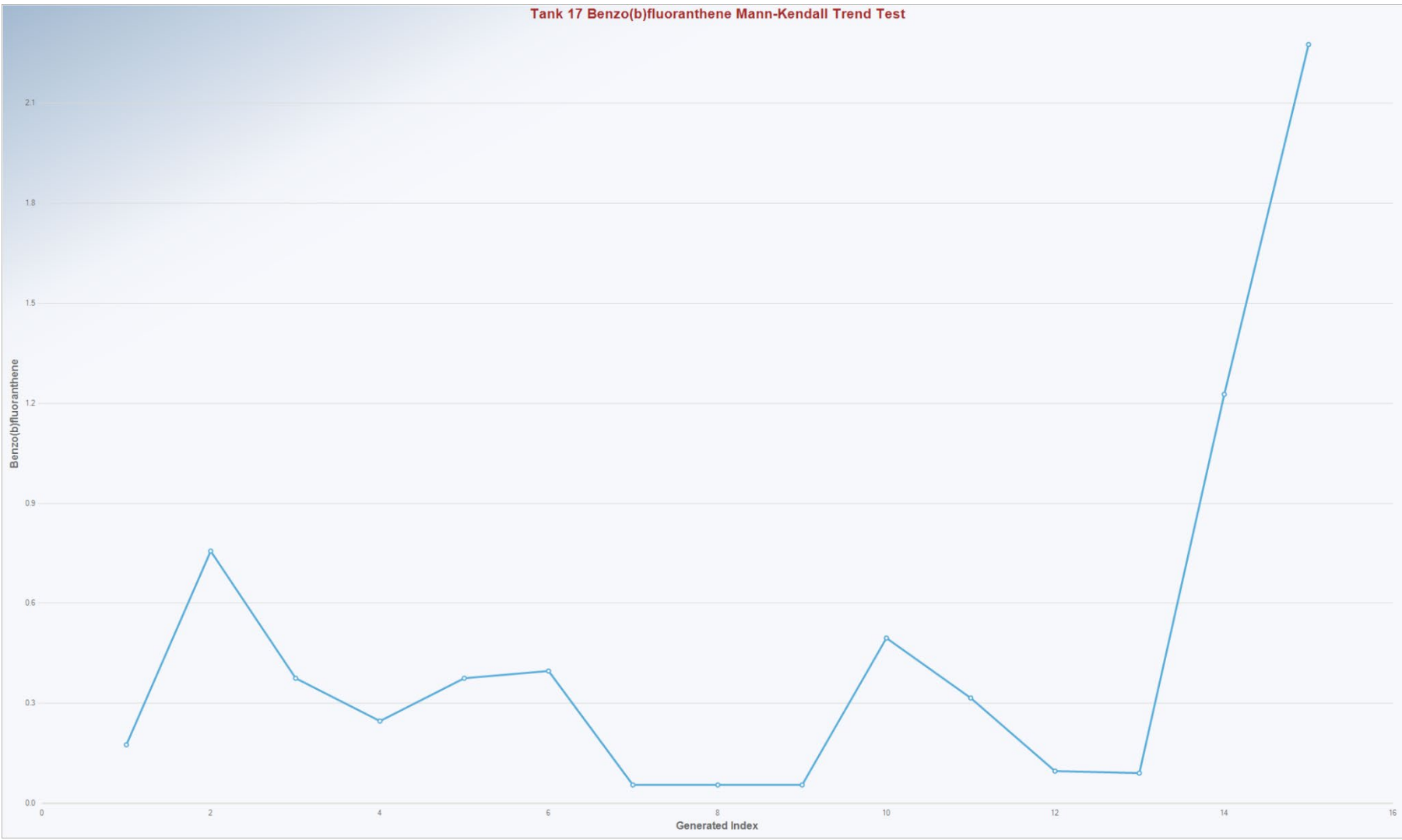
Tank 17 Benzo(a)anthracene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	0.4949
M-K Test Value (S)	11
Tabulated p-value	0.3130
Approximate p-value	0.3103

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Benzo(b)fluoranthene Mann-Kendall Trend Test

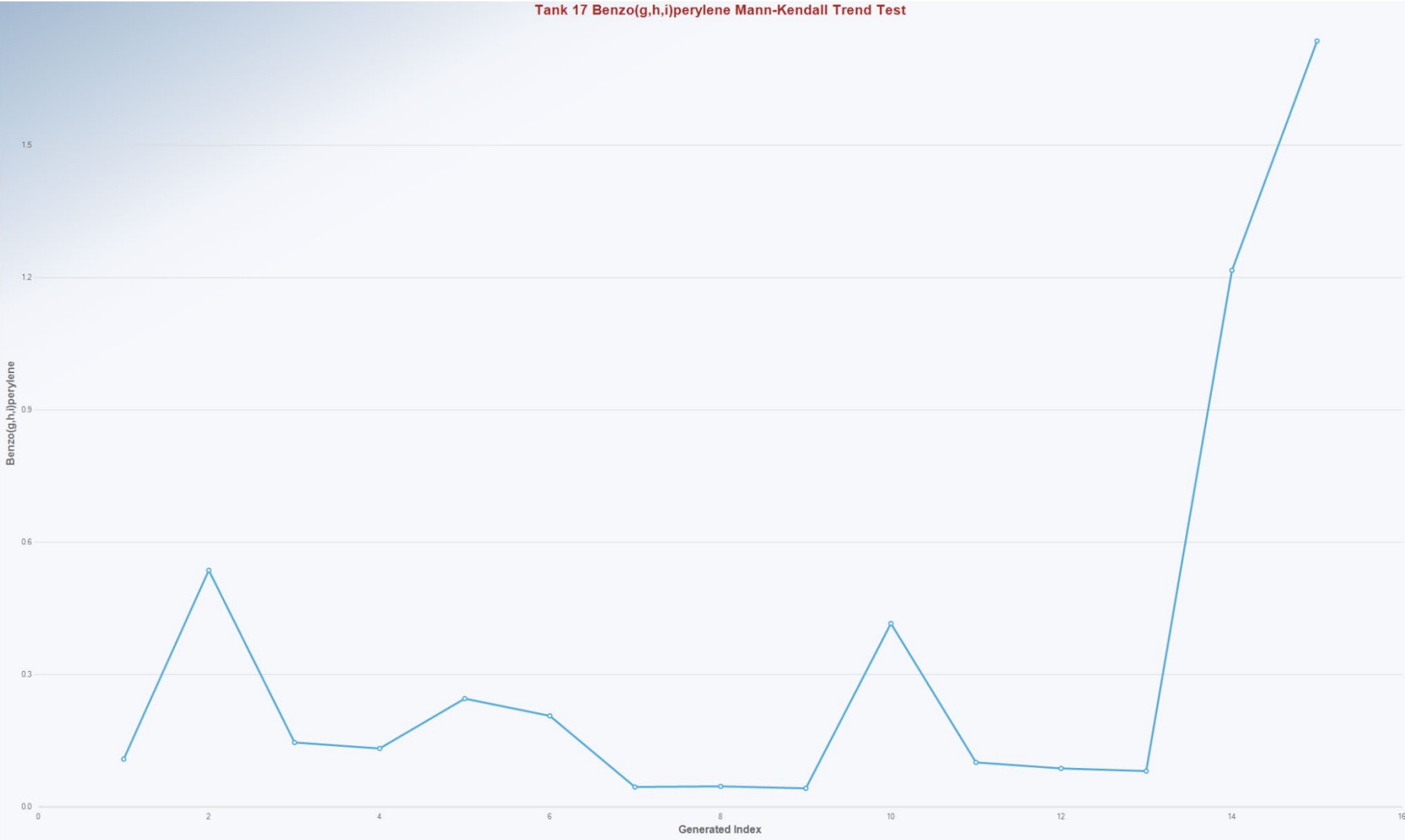


Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	0.3468
M-K Test Value (S)	8
Tabulated p-value	0.3490
Approximate p-value	0.3644

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:49:34 AM								
4	From File			Tank17_Benzo(g,h,i)perylene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Benzo(g,h,i)perylene											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			0.0059								
16	Maximum			1.7								
17	Mean			0.307								
18	Geometric Mean			0.0988								
19	Median			0.096								
20	Standard Deviation			0.491								
21	Coefficient of Variation			1.599								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			3								
25	Tabulated p-value			0.461								
26	Standard Deviation of S			20.21								
27	Standardized Value of S			0.099								
28	Approximate p-value			0.461								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 17 Benzo(g,h,i)perylene Mann-Kendall Trend Test

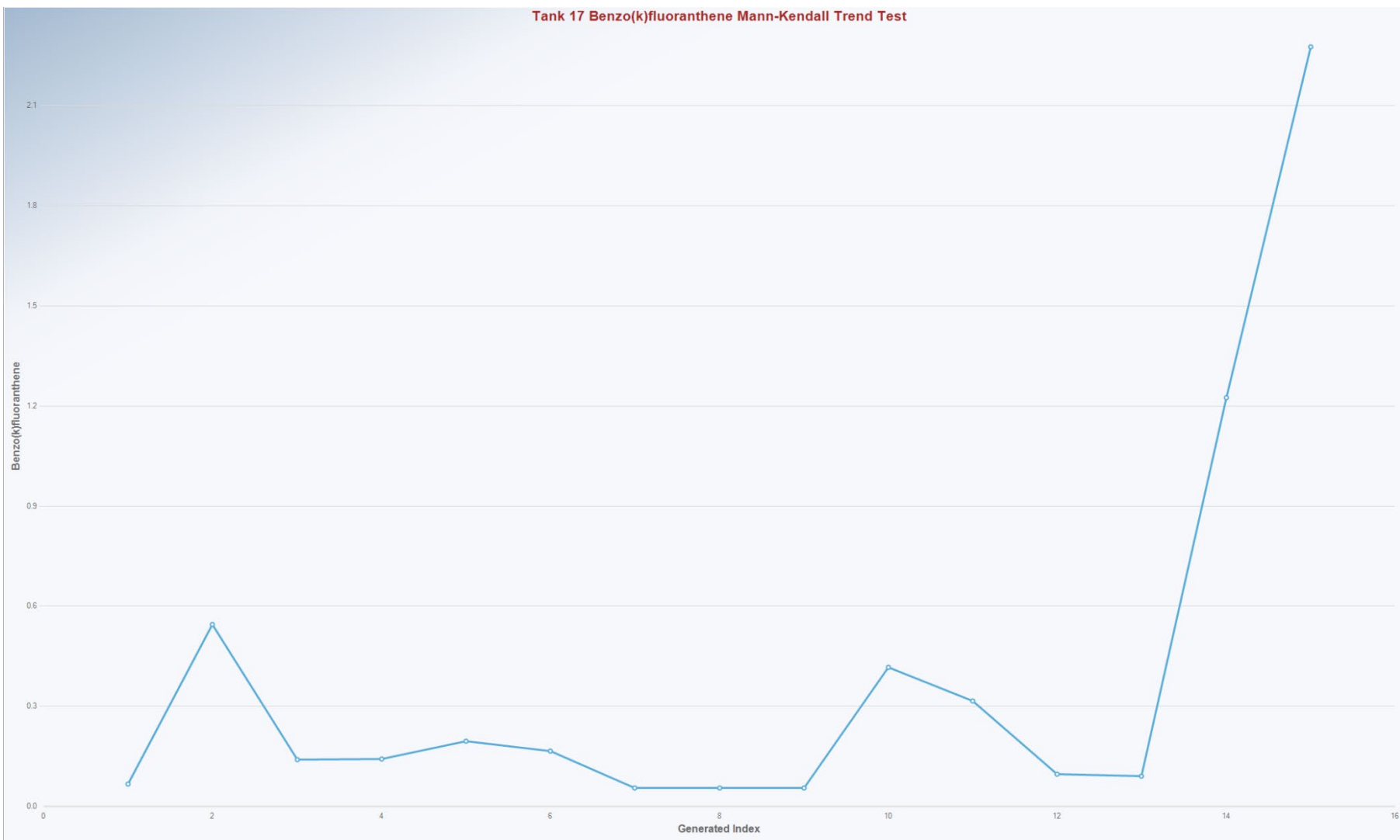


Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	0.0990
M-K Test Value (S)	3
Tabulated p-value	0.4610
Approximate p-value	0.4606

Insufficient statistical evidence of a significant trend at the specified level of significance.

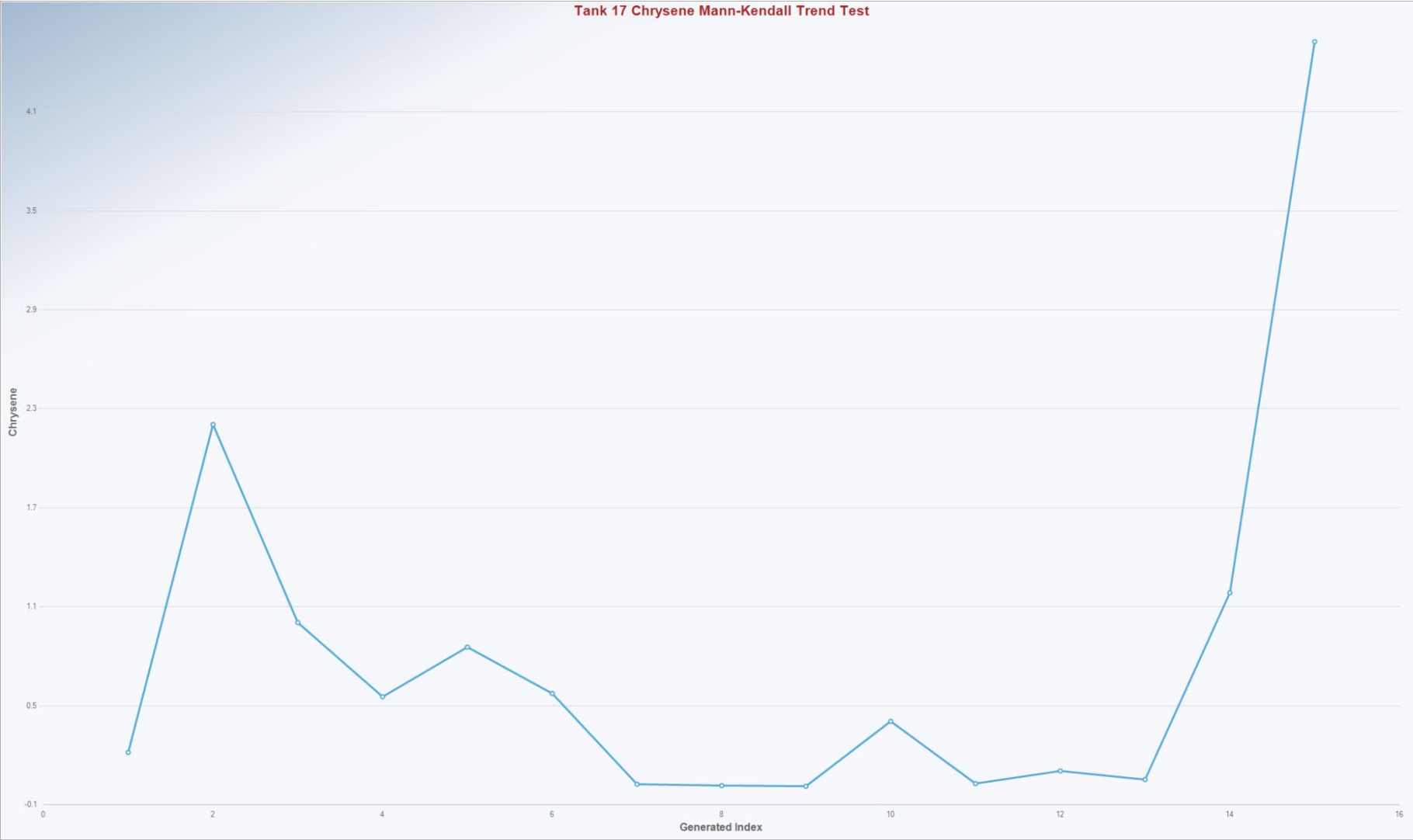
Tank 17 Benzo(k)fluoranthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	1.0887
M-K Test Value (S)	23
Tabulated p-value	0.1410
Approximate p-value	0.1381

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Chrysene Mann-Kendall Trend Test

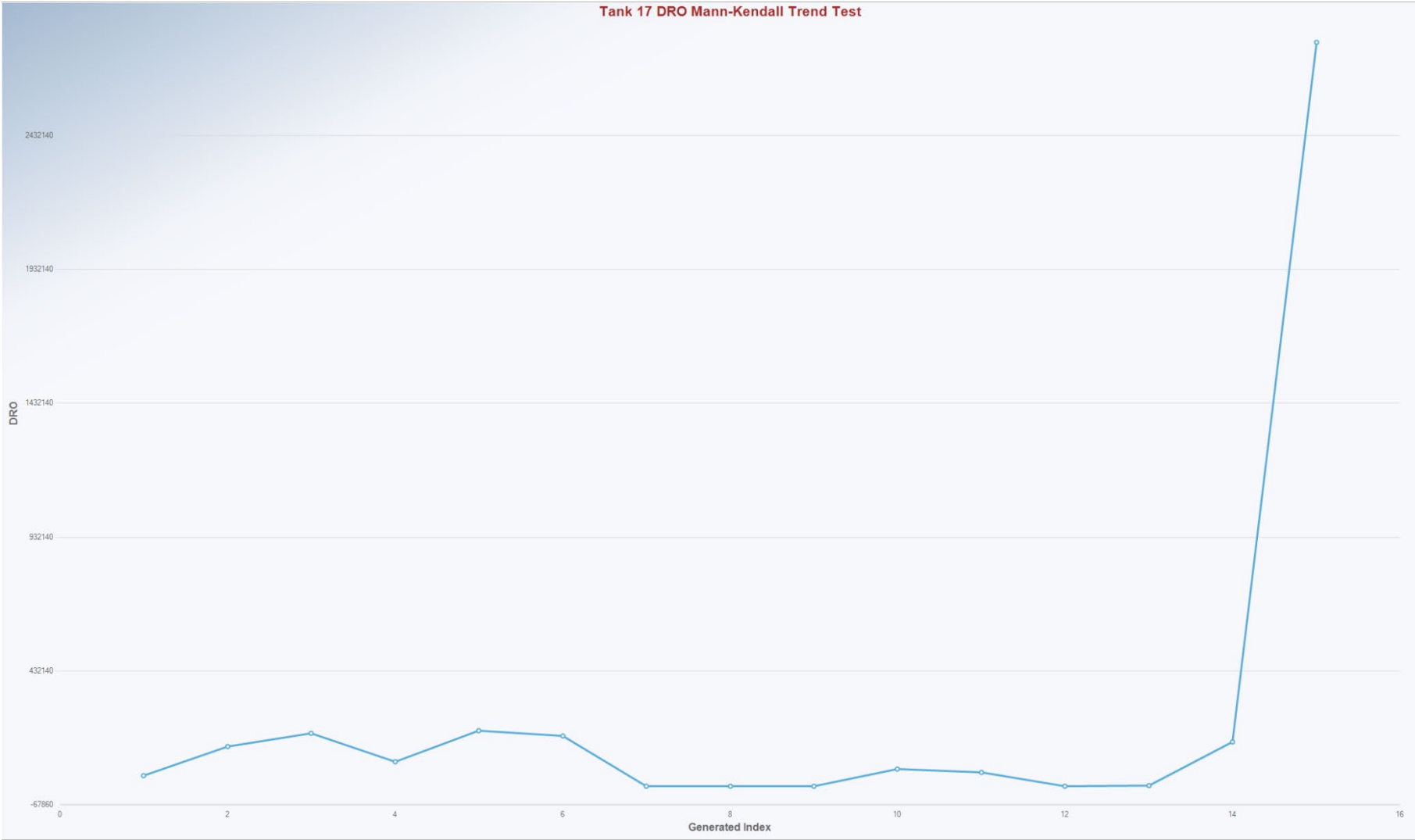


Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	-0.3959
M-K Test Value (S)	-9
Tabulated p-value	0.3430
Approximate p-value	0.3461

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:54:25 AM								
4	From File			Tank17_DRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	DRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			1600								
16	Maximum			2780000								
17	Mean			264038								
18	Geometric Mean			36863								
19	Median			65000								
20	Standard Deviation			700537								
21	Coefficient of Variation			2.653								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-8								
25	Tabulated p-value			0.349								
26	Standard Deviation of S			20.18								
27	Standardized Value of S			-0.347								
28	Approximate p-value			0.364								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 17 DRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	-0.3468
M-K Test Value (S)	-8
Tabulated p-value	0.3490
Approximate p-value	0.3644

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Fluoranthene Mann-Kendall Trend Test

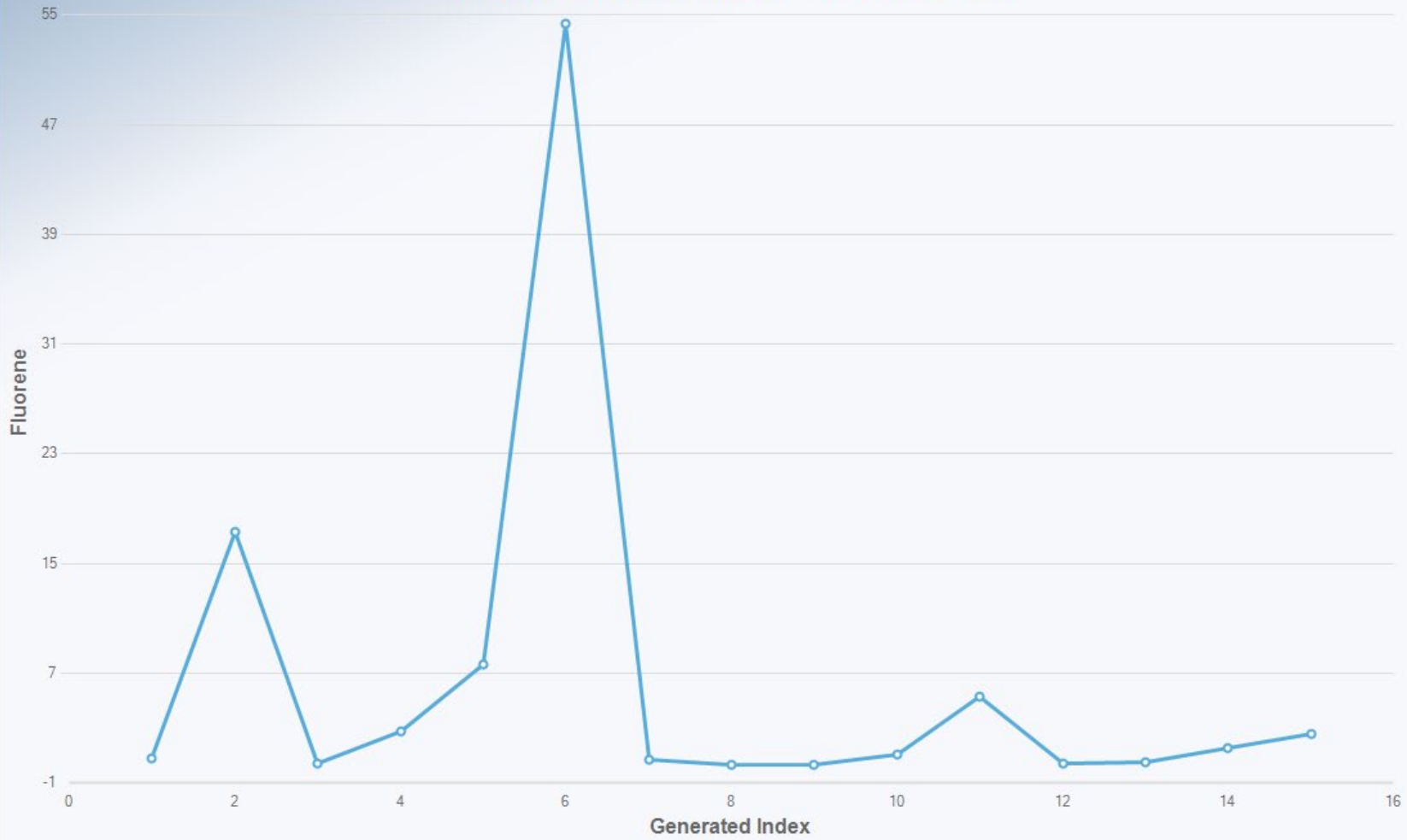


Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	-0.3959
M-K Test Value (S)	-9
Tabulated p-value	0.3490
Approximate p-value	0.3461

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Fluorene Mann-Kendall Trend Test



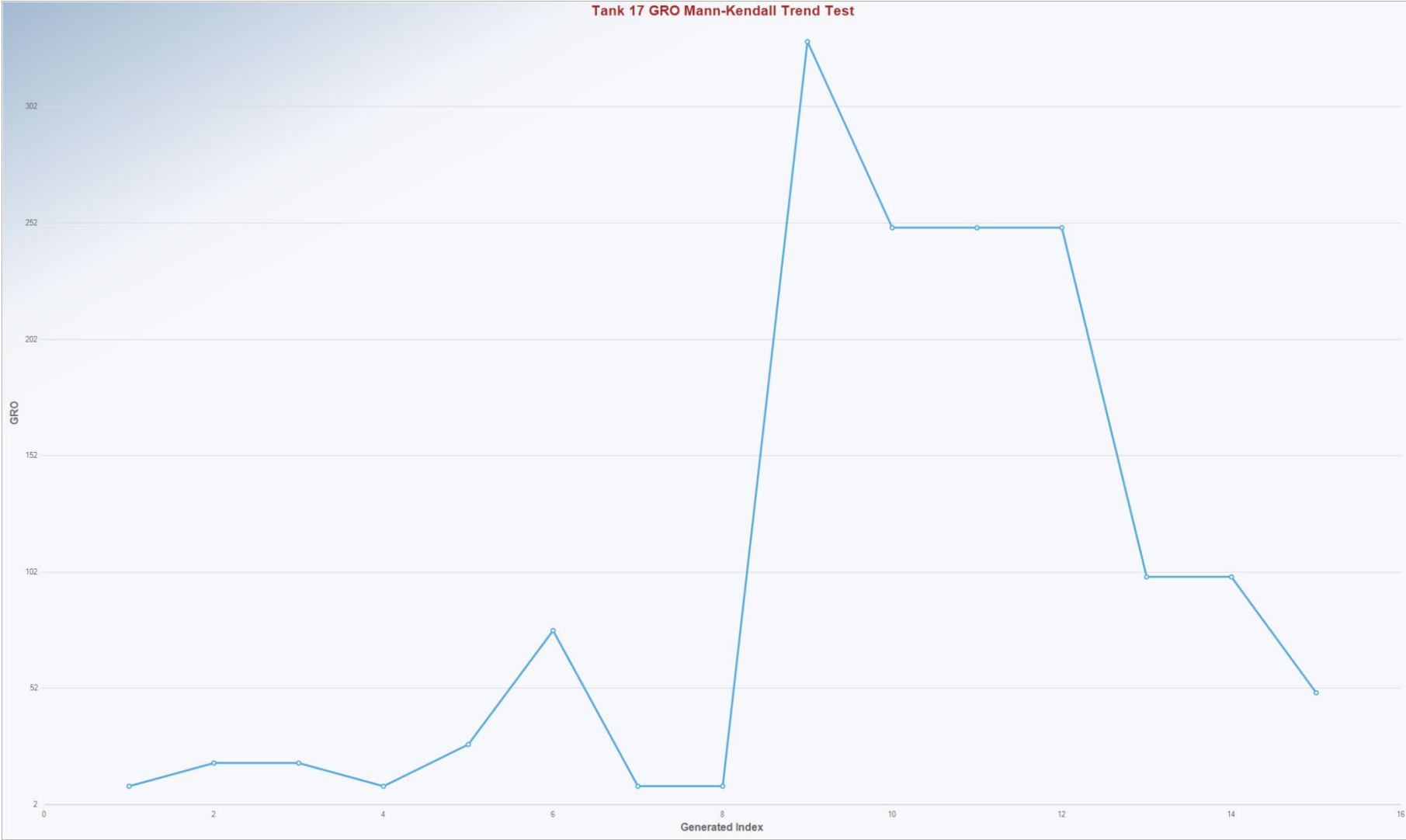
Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	-0.3959
M-K Test Value (S)	-9
Tabulated p-value	0.3490
Approximate p-value	0.3461

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/27/2022 3:54:52 PM								
4	From File			Tank17_GRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	GRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			15								
14	Number Values Reported (n)			15								
15	Minimum			10								
16	Maximum			330								
17	Mean			101								
18	Geometric Mean			48.96								
19	Median			50								
20	Standard Deviation			111.4								
21	Coefficient of Variation			1.103								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			38								
25	Tabulated p-value			0.029								
26	Standard Deviation of S			19.85								
27	Standardized Value of S			1.864								
28	Approximate p-value			0.0312								
29												
30	Statistically significant evidence of an increasing											
31	trend at the specified level of significance.											

Tank 17 GRO Mann-Kendall Trend Test

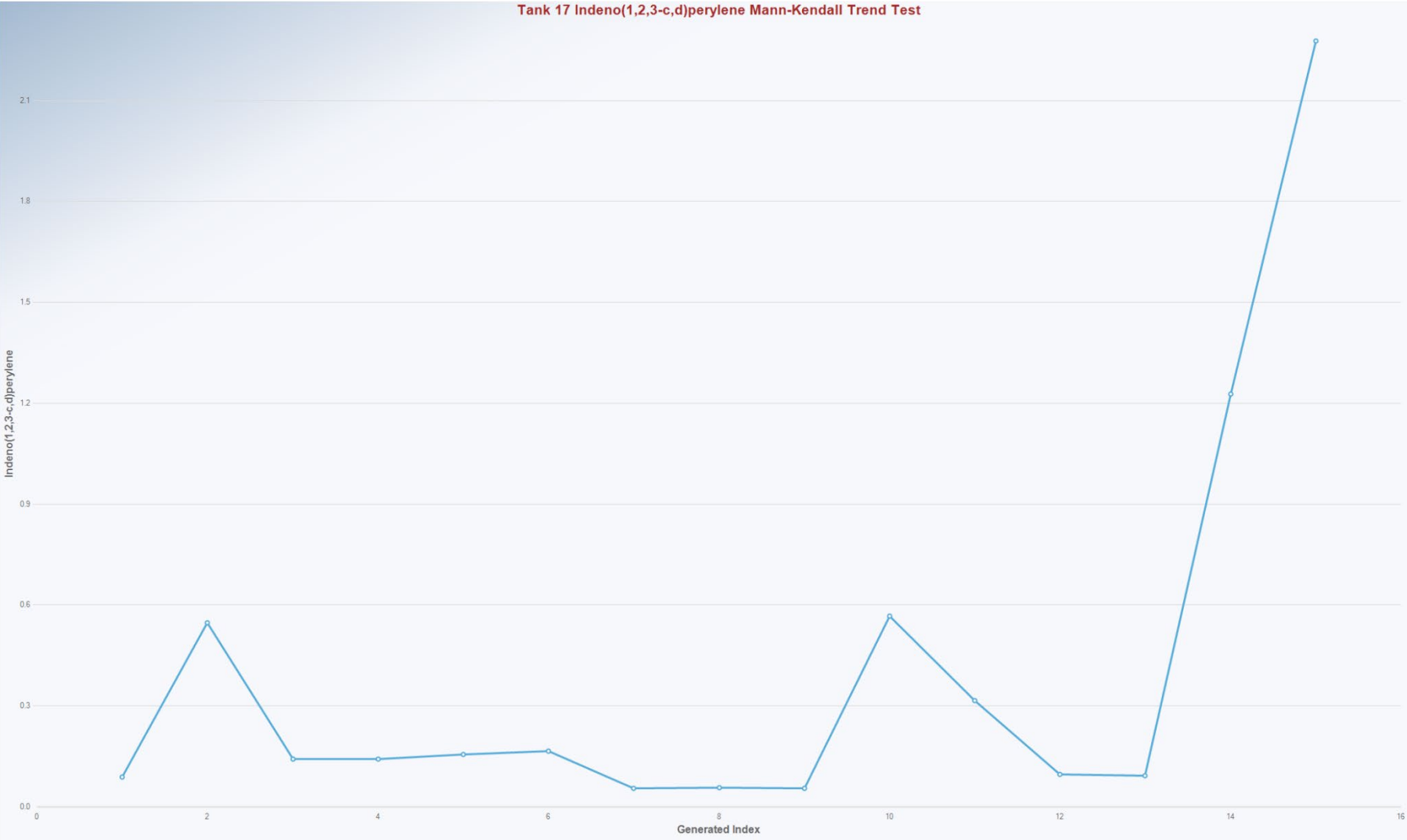


Mann-Kendall Trend Analysis	
n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	19.8494
Standardized Value of S	1.8640
M-K Test Value (S)	38
Tabulated p-value	0.0290
Approximate p-value	0.0312

Statistically significant evidence of an increasing trend at the specified level of significance.

A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis							
2	User Selected Options										
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:55:51 AM							
4	From File			Tank17_Indeno(1,2,3-c,d)perylene_Inputs.xls							
5	Full Precision			OFF							
6	Confidence Coefficient			0.95							
7	Level of Significance			0.05							
8											
9	Indeno(1,2,3-c,d)perylene										
10											
11	General Statistics										
12	Number or Reported Events Not Used			0							
13	Number of Generated Events			15							
14	Number Values Reported (n)			15							
15	Minimum			0.0088							
16	Maximum			2.23							
17	Mean			0.353							
18	Geometric Mean			0.104							
19	Median			0.096							
20	Standard Deviation			0.606							
21	Coefficient of Variation			1.72							
22											
23	Mann-Kendall Test										
24	M-K Test Value (S)			23							
25	Tabulated p-value			0.141							
26	Standard Deviation of S			20.21							
27	Standardized Value of S			1.089							
28	Approximate p-value			0.138							
29											
30	Insufficient evidence to identify a significant										
31	trend at the specified level of significance.										

Tank 17 Indeno(1,2,3-c,d)perylene Mann-Kendall Trend Test

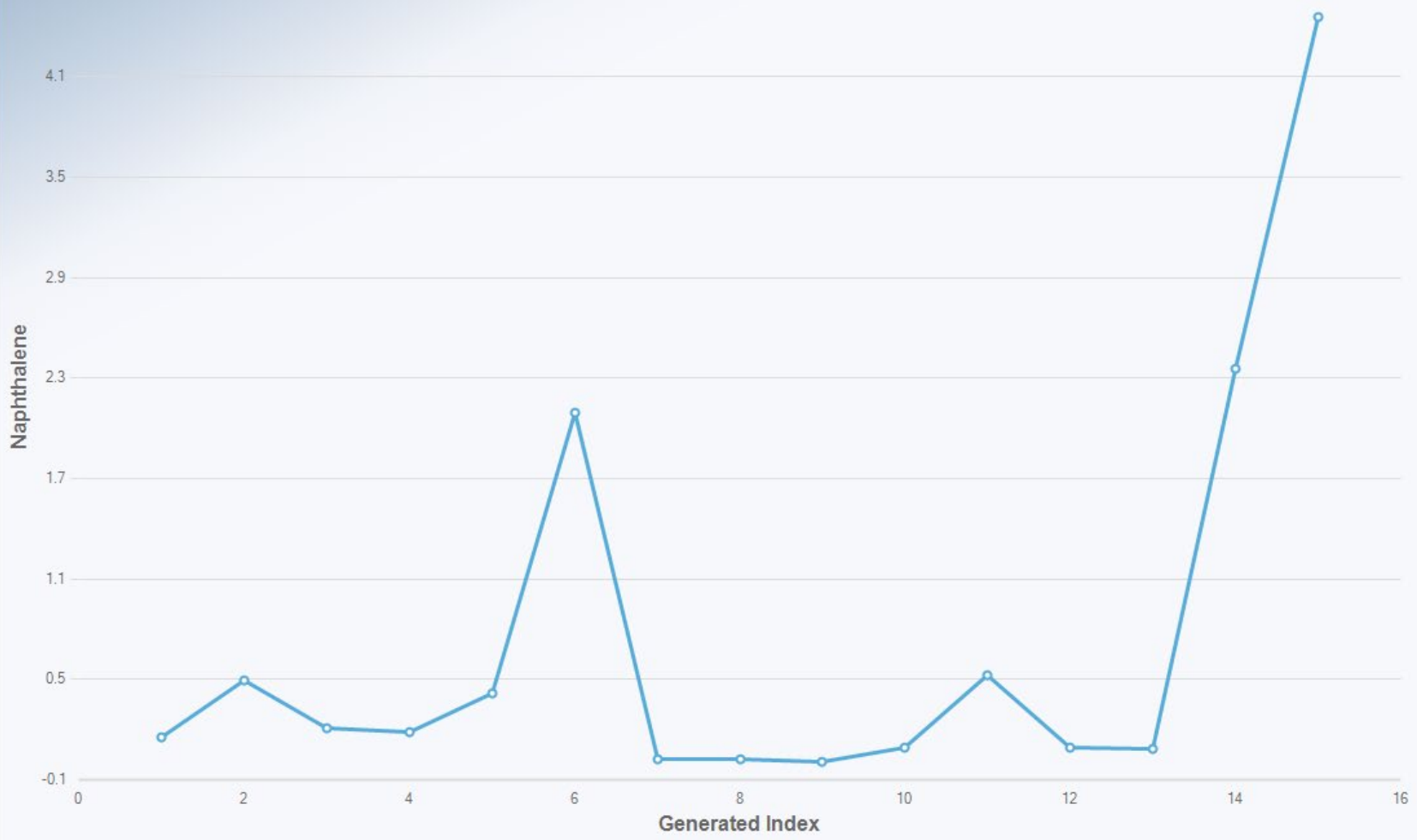


Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	1.0887
M-K Test Value (S)	23
Tabulated p-value	0.1410
Approximate p-value	0.1381

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Naphthalene Mann-Kendall Trend Test

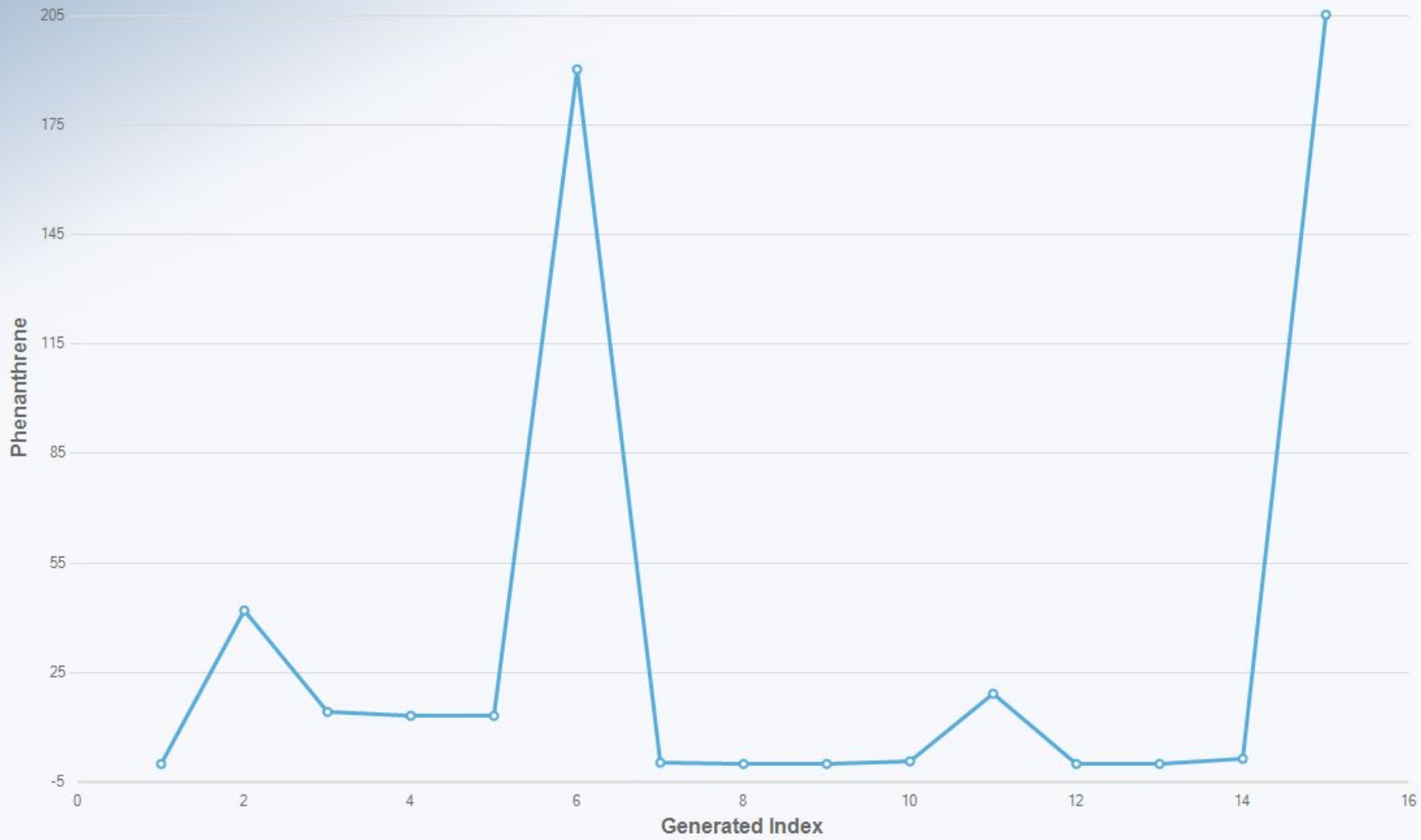


Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	0.4459
M-K Test Value (S)	10
Tabulated p-value	0.3130
Approximate p-value	0.3278

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Phenanthrene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.1825
Standardized Value of S	-0.0495
M-K Test Value (S)	-2
Tabulated p-value	0.4610
Approximate p-value	0.4802

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 17 Pyrene Mann-Kendall Trend Test



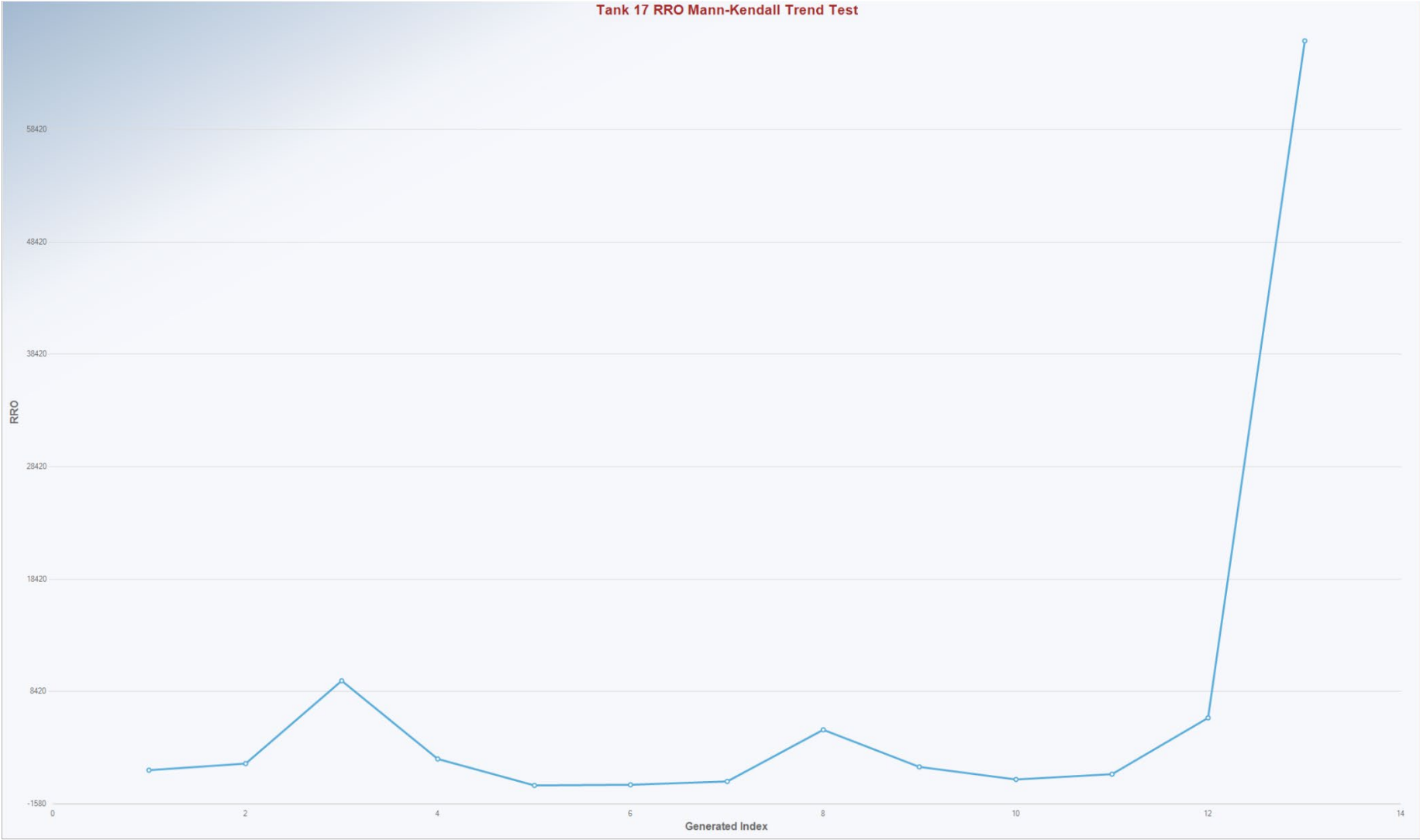
Mann-Kendall Trend Analysis

n	15
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	20.2073
Standardized Value of S	-0.8908
M-K Test Value (S)	-19
Tabulated p-value	0.1900
Approximate p-value	0.1865

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:57:13 AM								
4	From File			Tank17_RRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	RRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			13								
14	Number Values Reported (n)			13								
15	Minimum			76								
16	Maximum			66300								
17	Mean			7428								
18	Geometric Mean			1606								
19	Median			1700								
20	Standard Deviation			17901								
21	Coefficient of Variation			2.41								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			16								
25	Tabulated p-value			0.184								
26	Standard Deviation of S			16.39								
27	Standardized Value of S			0.915								
28	Approximate p-value			0.18								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 17 RRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

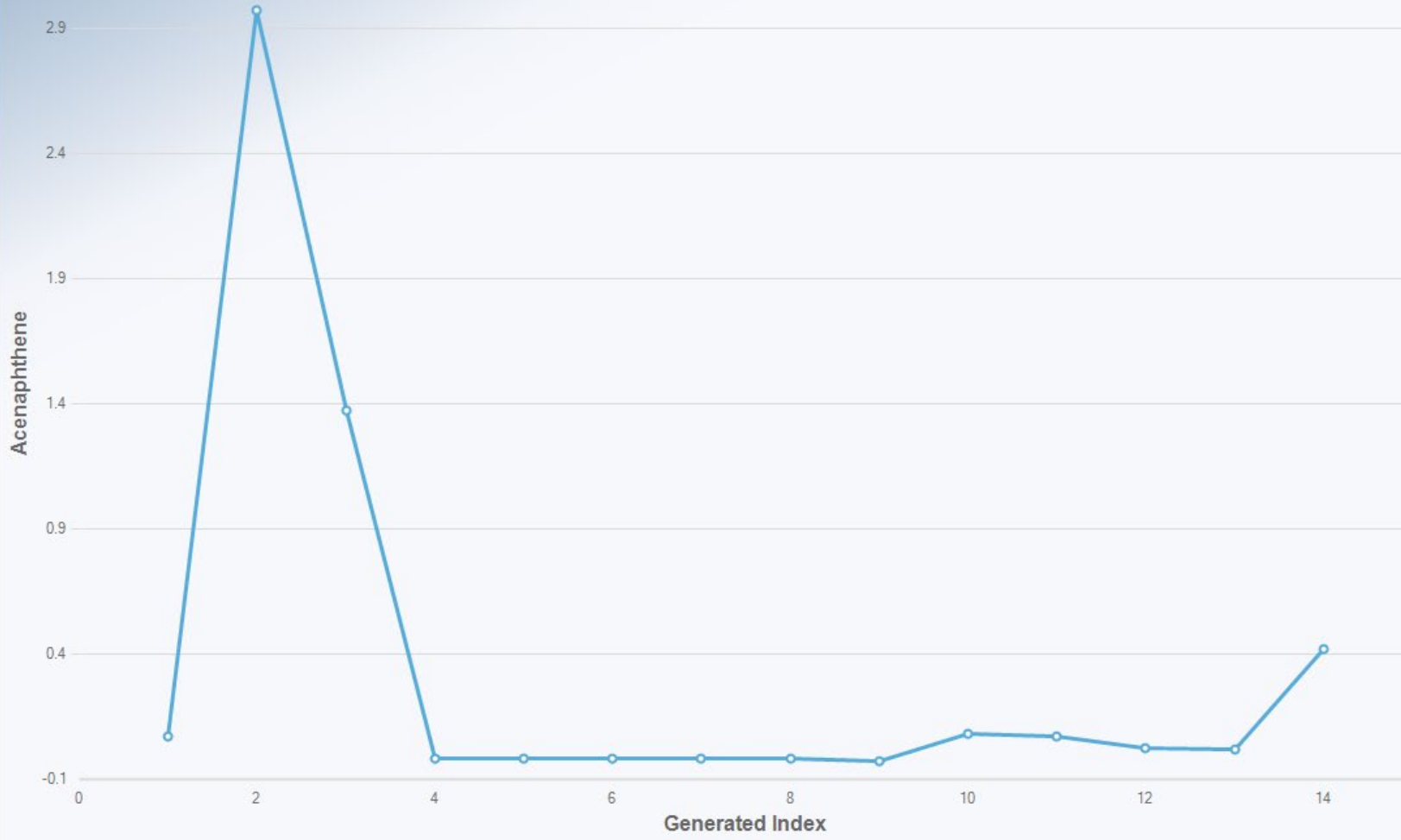
n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3911
Standardized Value of S	0.9151
M-K Test Value (S)	16
Tabulated p-value	0.1840
Approximate p-value	0.1801

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank Tunnel 18

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Tank 18 Acenaphthene Mann-Kendall Trend Test

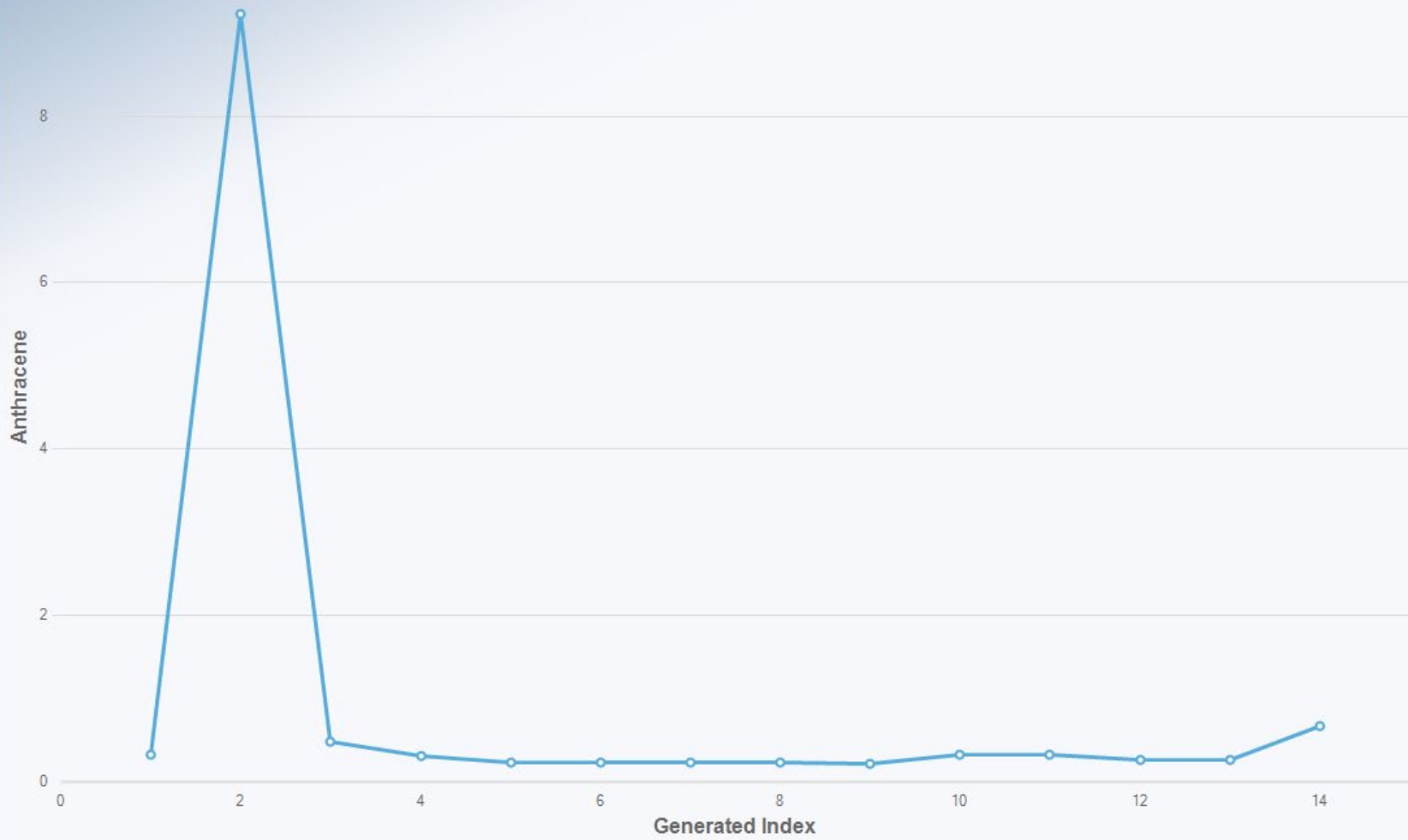


Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.1842
Standardized Value of S	-0.2750
M-K Test Value (S)	-6
Tabulated p-value	0.3740
Approximate p-value	0.3917

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Anthracene Mann-Kendall Trend Test

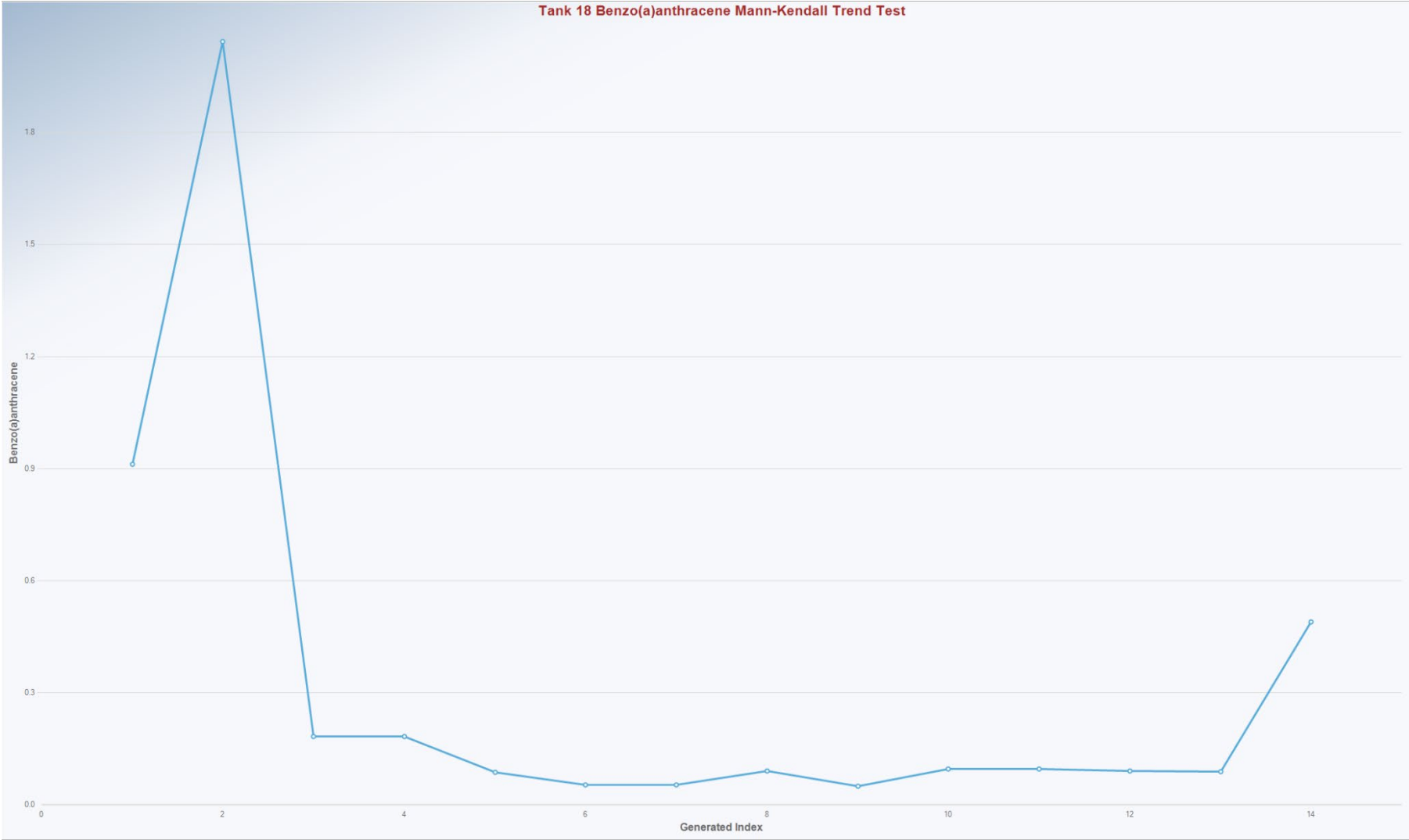


Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2117
Standardized Value of S	-0.4393
M-K Test Value (S)	-9
Tabulated p-value	0.3340
Approximate p-value	0.3302

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Benzo(a)anthracene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2392
Standardized Value of S	-1.1514
M-K Test Value (S)	-22
Tabulated p-value	0.1170
Approximate p-value	0.1248

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Benzo(a)pyrene Mann-Kendall Trend Test

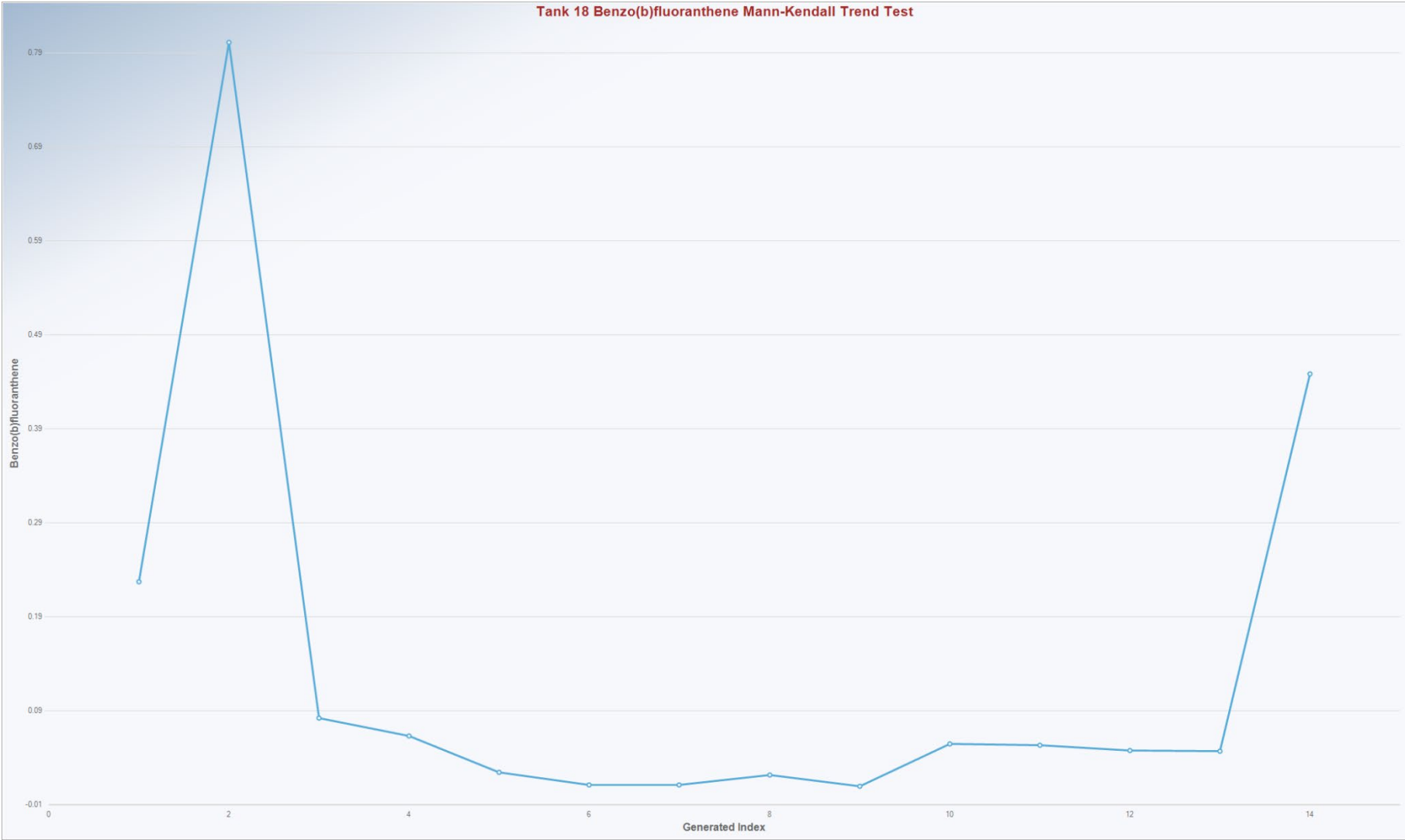


Mann-Kendall Trend Analysis	
n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2392
Standardized Value of S	-0.9321
M-K Test Value (S)	-18
Tabulated p-value	0.1650
Approximate p-value	0.1757

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/27/2022 4:04:17 PM								
4	From File			Tank18_Benzo(b)fluoranthene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Benzo(b)fluoranthene											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			14								
14	Number Values Reported (n)			14								
15	Minimum			0.0083								
16	Maximum			0.8								
17	Mean			0.135								
18	Geometric Mean			0.0511								
19	Median			0.0492								
20	Standard Deviation			0.225								
21	Coefficient of Variation			1.674								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-21								
25	Tabulated p-value			0.14								
26	Standard Deviation of S			18.27								
27	Standardized Value of S			-1.095								
28	Approximate p-value			0.137								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

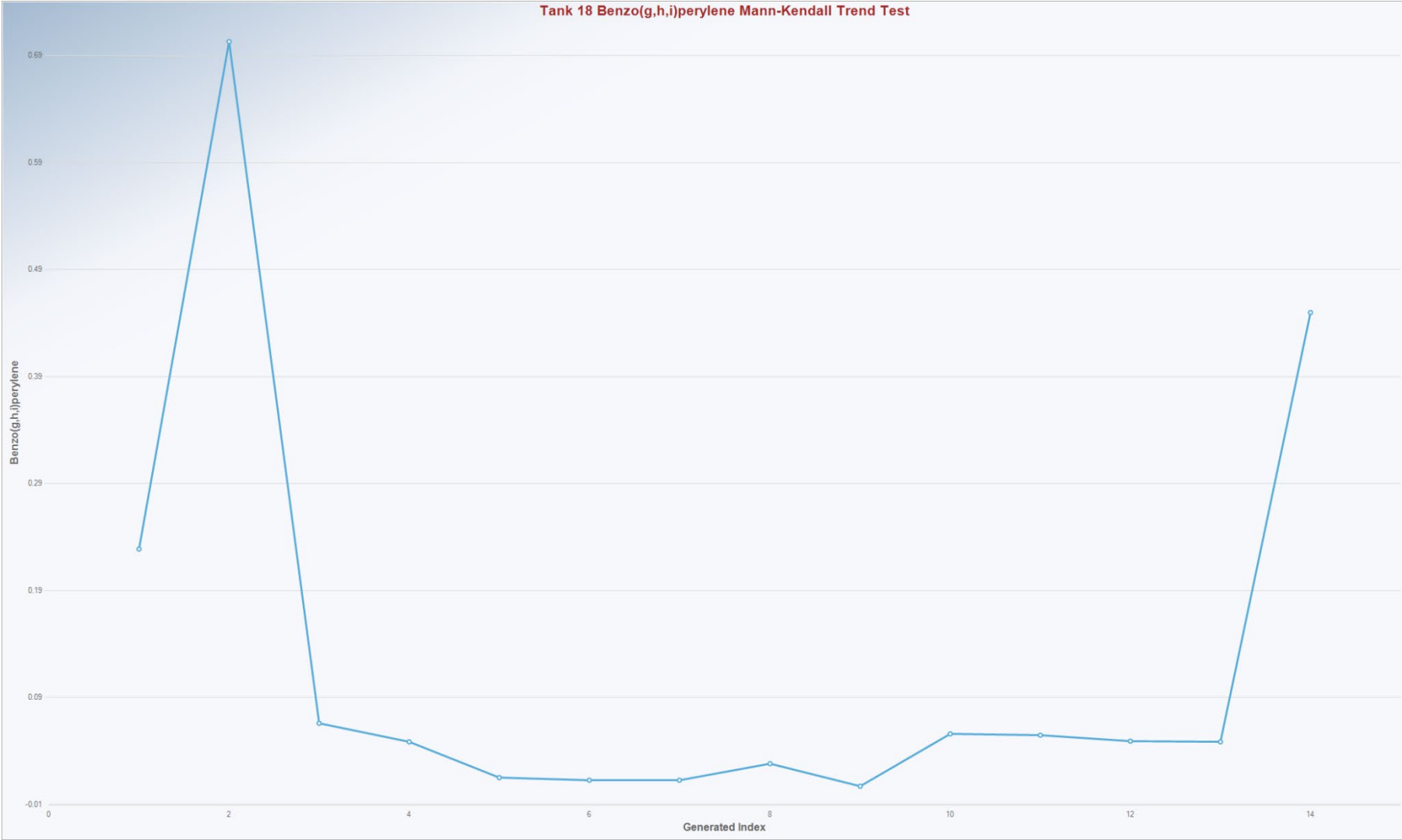
Tank 18 Benzo(b)fluoranthene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2655
Standardized Value of S	-1.0949
M-K Test Value (S)	-21
Tabulated p-value	0.1400
Approximate p-value	0.1368

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Benzo(g,h,i)perylene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2665
Standardized Value of S	-0.6569
M-K Test Value (S)	-13
Tabulated p-value	0.2590
Approximate p-value	0.2556

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/27/2022 4:07:16 PM								
4	From File			Tank18_Chrysene_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	Chrysene											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			14								
14	Number Values Reported (n)			14								
15	Minimum			0.0065								
16	Maximum			3								
17	Mean			0.412								
18	Geometric Mean			0.0793								
19	Median			0.0497								
20	Standard Deviation			0.837								
21	Coefficient of Variation			2.032								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-23								
25	Tabulated p-value			0.117								
26	Standard Deviation of S			18.27								
27	Standardized Value of S			-1.204								
28	Approximate p-value			0.114								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

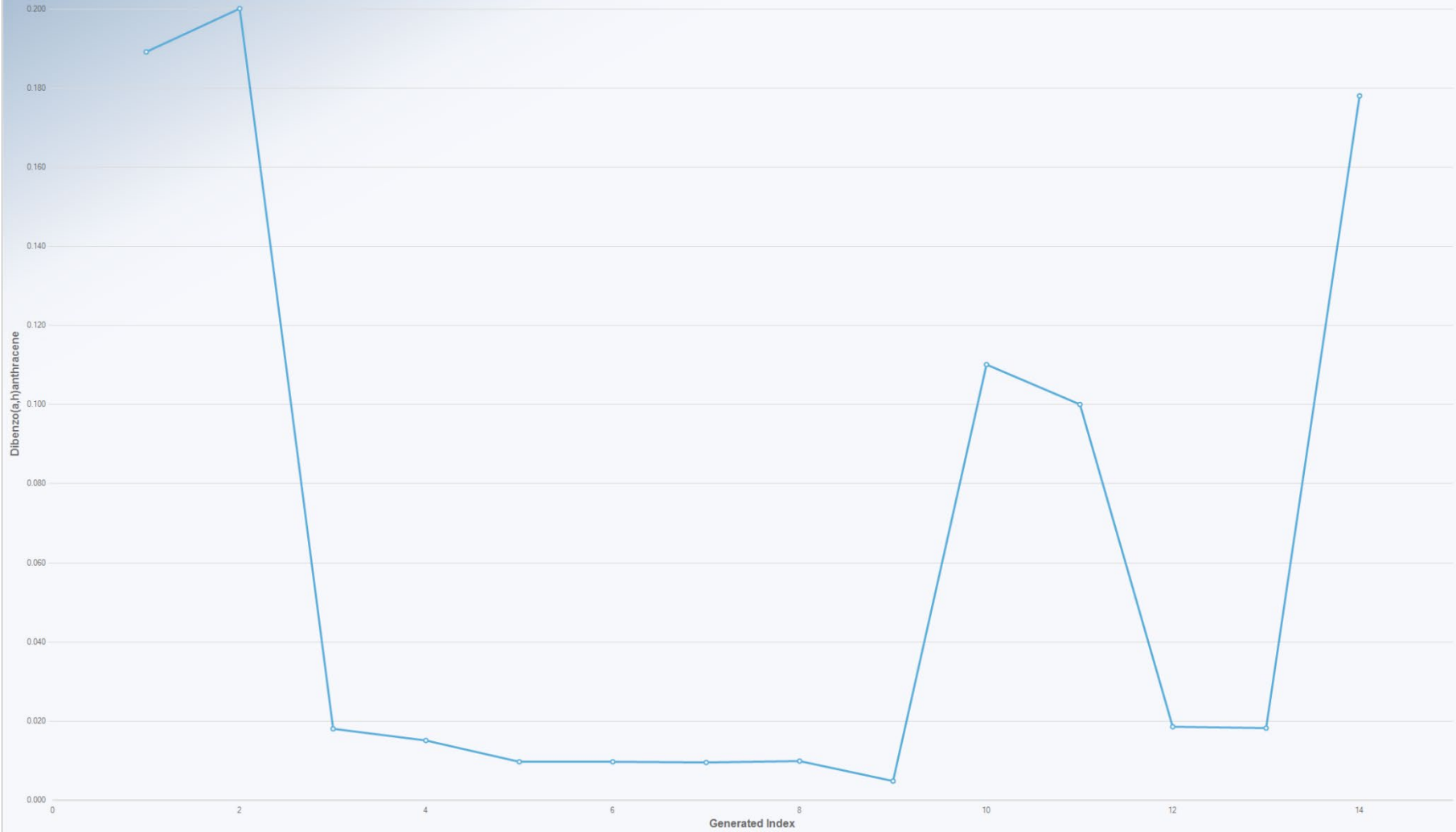
Tank 18 Chrysene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2665
Standardized Value of S	-1.2044
M-K Test Value (S)	-23
Tabulated p-value	0.1170
Approximate p-value	0.1142

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Dibenzo(a,h)anthracene Mann-Kendall Trend Test

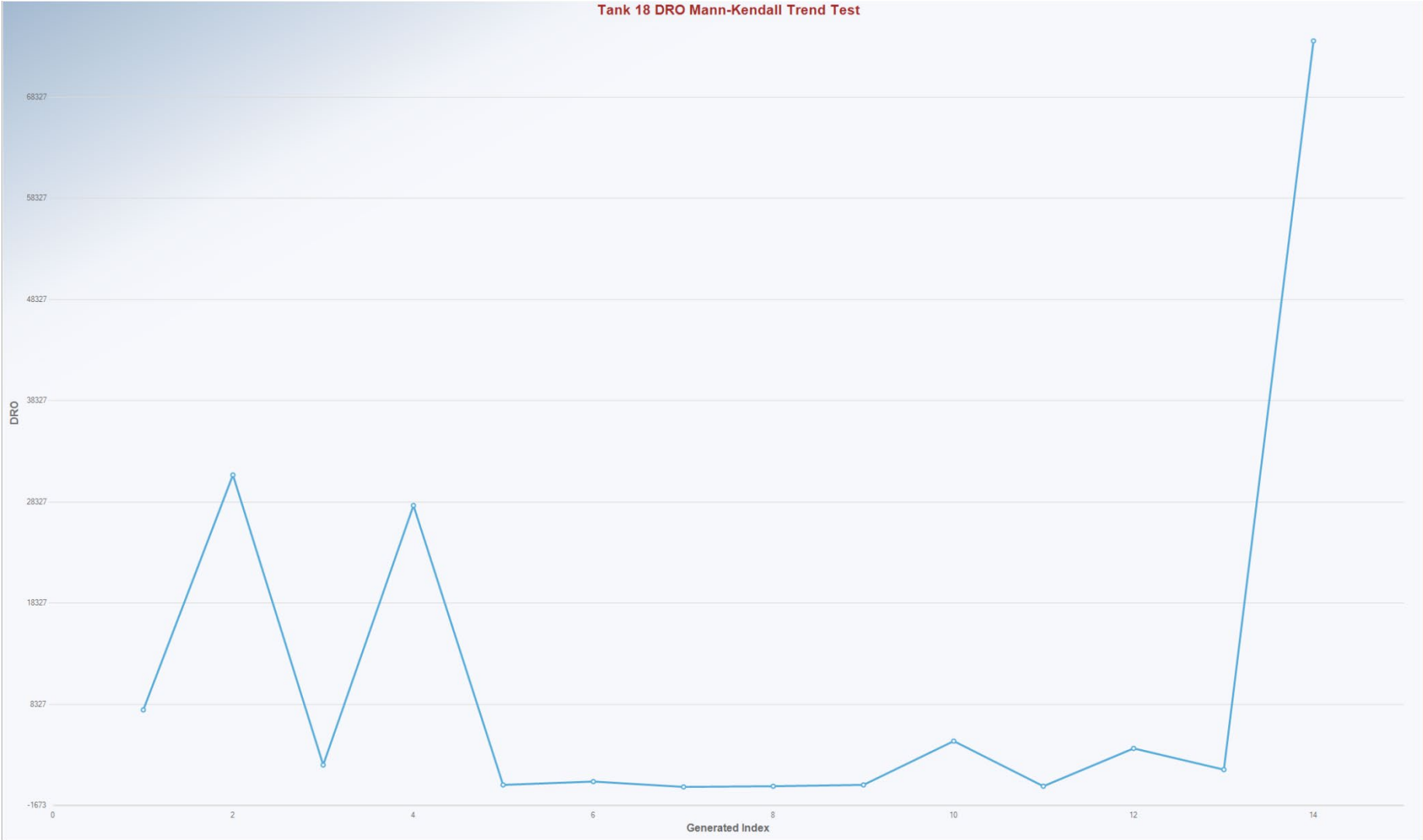


Mann-Kendall Trend Analysis	
n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2392
Standardized Value of S	-0.1645
M-K Test Value (S)	-4
Tabulated p-value	0.4150
Approximate p-value	0.4347

Insufficient statistical evidence of a significant trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:58:15 AM								
4	From File			Tank18_DRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	DRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			14								
14	Number Values Reported (n)			14								
15	Minimum			170								
16	Maximum			73900								
17	Mean			11108								
18	Geometric Mean			2075								
19	Median			2080								
20	Standard Deviation			20730								
21	Coefficient of Variation			1.866								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-10								
25	Tabulated p-value			0.295								
26	Standard Deviation of S			18.24								
27	Standardized Value of S			-0.493								
28	Approximate p-value			0.311								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 18 DRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis	
n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2392
Standardized Value of S	-0.4934
M-K Test Value (S)	-10
Tabulated p-value	0.2950
Approximate p-value	0.3108

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Fluoranthene Mann-Kendall Trend Test

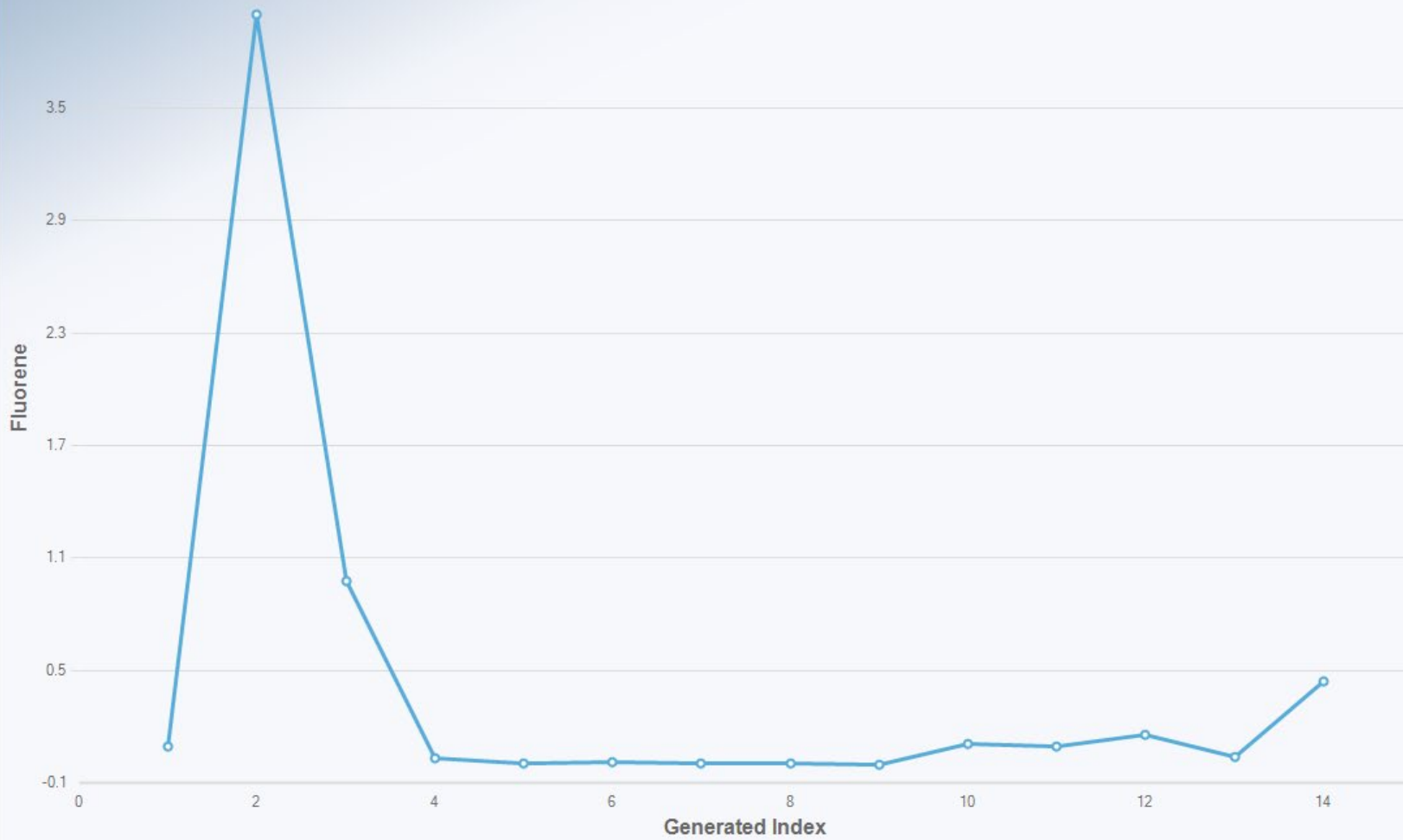


Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2392
Standardized Value of S	-0.1645
M-K Test Value (S)	-4
Tabulated p-value	0.4150
Approximate p-value	0.4347

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Fluorene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2392
Standardized Value of S	-0.0548
M-K Test Value (S)	-2
Tabulated p-value	0.4570
Approximate p-value	0.4781

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Indeno(1,2,3-c,d)perylene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standardized Value of S	18.2392
M-K Test Value (S)	0
Tabulated p-value	0.5000
Approximate p-value	

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Naphthalene Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2117
Standardized Value of S	-0.3295
M-K Test Value (S)	-7
Tabulated p-value	0.3740
Approximate p-value	0.3709

Insufficient statistical evidence of a significant trend at the specified level of significance.

Tank 18 Pyrene Mann-Kendall Trend Test



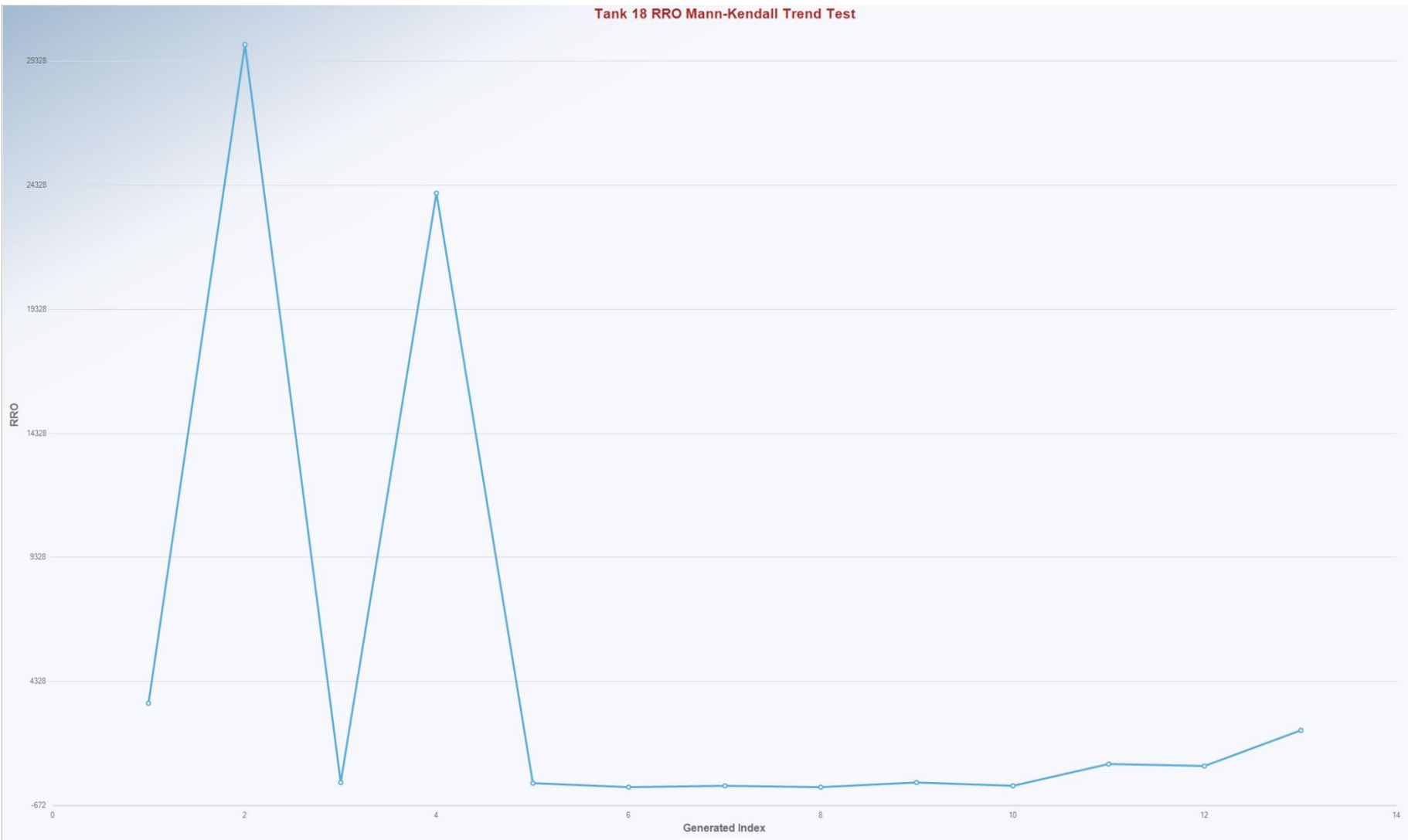
Mann-Kendall Trend Analysis

n	14
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	18.2665
Standardized Value of S	-2.2993
M-K Test Value (S)	-43
Tabulated p-value	0.0100
Approximate p-value	0.0107

Statistically significant evidence of a decreasing trend at the specified level of significance.

	A	B	C	D	E	F	G	H	I	J	K	L
1				Mann-Kendall Trend Test Analysis								
2	User Selected Options											
3	Date/Time of Computation			ProUCL 5.2 9/26/2022 10:59:15 AM								
4	From File			Tank18_RRO_Inputs.xls								
5	Full Precision			OFF								
6	Confidence Coefficient			0.95								
7	Level of Significance			0.05								
8												
9	RRO											
10												
11	General Statistics											
12	Number or Reported Events Not Used			0								
13	Number of Generated Events			13								
14	Number Values Reported (n)			13								
15	Minimum			76								
16	Maximum			30000								
17	Mean			4838								
18	Geometric Mean			693.2								
19	Median			270								
20	Standard Deviation			9964								
21	Coefficient of Variation			2.06								
22												
23	Mann-Kendall Test											
24	M-K Test Value (S)			-9								
25	Tabulated p-value			0.338								
26	Standard Deviation of S			16.36								
27	Standardized Value of S			-0.489								
28	Approximate p-value			0.312								
29												
30	Insufficient evidence to identify a significant											
31	trend at the specified level of significance.											

Tank 18 RRO Mann-Kendall Trend Test



Mann-Kendall Trend Analysis

n	13
Confidence Coefficient	0.9500
Level of Significance	0.0500
Standard Deviation of S	16.3605
Standardized Value of S	-0.4890
M-K Test Value (S)	-9
Tabulated p-value	0.3380
Approximate p-value	0.3124

Insufficient statistical evidence of a significant trend at the specified level of significance.

ATTACHMENT 4
RESPONSE TO COMMENTS

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REVIEW

PROJECT: Rocky Point Management Area
DOCUMENT: Tech Memo: Cut and Cover Tank Tunnel Surface Water Trend Analysis, Rocky Point Management Area, Draft Final
LOCATION: Amaknak Island, Unalaska, Alaska
PROJECT NO.: 2542.38.018

ADEC		Date: December 15, 2022 RTC: January 31, 2023 ADEC Reviewer: Cas Galasso Phone: (907) 451-2181	Date: Responder: Phone:	Date: January 31, 2023
Item No.	Page No.	ADEC COMMENTS	RESPONSIBLE PARTY RESPONSE A-Agree D-Disagree	ADEC RESPONSE A-Agree D-Disagree

1.	General	Please include the ADEC File number: 2542.38.018.	Agreed. This will be added to the “Project” line of the header.	Agree.
2.	General	In past reporting, ADEC has requested current photos of the tanks and the inspections. Please provide a photo log, either to this Tech Memo or the 2022 Annual Report.	A Weir Inspection report will be generated in the early part of 2023, which will include a photo log documenting inspection activities.	Agree.
3.	Section 1	Statement: “...when compared to adjacent groundwater samples, this water does not appear to be a source for the adjacent groundwater contamination.” Please provide more information to support this statement. Surface water at Tanks 12 and 16 indicate DRO levels above Table C Cleanup Levels, and geographically corresponding monitoring wells (MWRP-28 and MWRP-29) have highly elevated levels of DRO detections. Further, there is no recent GW monitoring in wells MWRP-08 or MWRP-09, which are the closest wells to Tanks 17 and 18, which both have elevated levels of DRO in surface water. Is groundwater contamination believed to be the source of rising concentrations in select tanks over the past two years?	This language was from a previous historic document and will be removed from this document. However, it is not believed that groundwater contamination is the source of elevated concentrations in select tanks. Concentrations of DRO and RRO in tanks 12 and 16 are within the range of historical results, and concentrations of DRO and RRO in wells MWRP-28 and MWRP-29 decreased during the 2022 sampling event from previous years. Wells MWRP-08 and MWRP-09 are downgradient from tanks 17 and 18, and we recommend including these wells in the 2023 sampling effort to gather more information about the elevated levels of fuels in surface water from tanks 17 and 18. Further sampling of these wells will be re-evaluated after the 2023 sampling event.	Agree.
4.	Table 2-1	ADEC requests either Table 2-1 is modified to include the 46 analytes that indicate no trend, with the associated historical analyte concentration range, or a separate table is provided with the no trend analytes. This table is misrepresentative of the data,	Agreed. A column will be added to Table 3 in Attachment 2 that provides the analytes historical concentration range.	Agree.

REVIEW

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		as it does not include results with no trend that still significantly exceed Table C Cleanup Levels (example: RRO in Tanks 12 and 17, and DRO in Tank 18).		
5.	Table 2-1	Please note, the RPMA ACLs are not representative of ADEC Cleanup Levels in a decision making capacity. The 10x rule was repealed by ADEC in 2008. For an approved site-specific alternative cleanup level, institutional controls would need to be in place to restrict potential groundwater use at the site. Since the promulgation of the Uniform Environmental Covenant Act (UECA) in 2018, this would mean a covenant would need to be filed with ADNRS's land records that state the restriction of groundwater use in the area.	As indicated in the annual groundwater reports, surface water collected from the tank tunnels is compared to both ADEC Table C cleanup levels, as well as the RPMA ACLs that were approved via the December 16, 2008 letter allowing for the continued use of the approved ACLs for the site. It is understood that future site closure will require contaminant concentrations to be compared to ADEC cleanup levels as presented in 18 AAC 75.345 (ADEC 2021) and the need for environmental covenants at the site under UECA will be evaluated at that time.	Agree.
6.	Section 3	Please clarify the statement regarding the 46 of 64 analytes that indicate no trend: "None of these analytes have had detectable exceedances in the last three years of annual sampling events." 2021 results for Tank 17 indicate the highest detection of DRO since 2011, and the highest recorded measurement of RRO. 2022 sampling results show both DRO and RRO are an order of magnitude above the 2021 results. These analytes, which according to the data indicate no trend at Tank 17, are detectable and gross exceedances. ADEC also disagrees with the statement that concentrations are remaining at relatively steady concentrations, as an OoM increase in one year is not indicative of this.	Agreed. The referenced sentence will be removed. Language will be updated to address stability and Table 3 will be updated to include a column that indicates stability: "...indicated "no trend," with five analytes in Tank 12 indicating stable concentrations and the remaining analytes in Tank 12 and all other tanks indicated as unstable. Table 3 identifies concentration stability for each analyte."	Agree.

REVIEW

PROJECT: Rocky Point Management Area
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LOCATION: Amaknak Island, Unalaska, Alaska
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Item No.	Page No.	ADEC COMMENTS	RESPONSIBLE PARTY RESPONSE A-Agree D-Disagree	ADEC RESPONSE A-Agree D-Disagree

			Discussion about Tank 17 concentrations will be added as a new paragraph between Paragraphs 3 and 4 of Section 3: <i>“The 2022 DRO and RRO results in Tank 17 were observed to have increased by an order of magnitude above the 2021 results. Although the reasoning is unclear, as there were no changes to the sampling methods, it is possible that the decreased amount of water within the tank tunnels at the time of sampling (compared to the previous year) may have contributed to the increased relative concentration for fuel constituents. Further recommendations are provided in the 2022 Annual Groundwater Monitoring and Operation and Maintenance Report.”</i>	
7.	Section 3	Due to the rising concentrations of DRO and RRO in select tanks, ADEC recommends the surface water is removed and treated appropriately. The 2020 approval of monthly tank inspections was provided based on the requirement to assess water sample results taken during this period to determine if there is data variability in the water samples due to concentration fluctuations or sampling method. This appears to be the case, as concentrations in some of the tanks have increased by an order of magnitude. ADEC will agree with the monthly monitoring of the tank tunnels continue for the next year (2023), provided the annual reporting identifies a recommendation for the rising concentrations in the tanks.	It is unclear why the concentrations of DRO and RRO had increased concentrations during this sampling event; there have not been any changes to the sampling methods and there have been no obvious changes to the environment that would explain this increase outside of potentially low water levels. The water level in tank 17 was lower during the time of sampling than it had been last year, and the decreased amount of water within the tank tunnels may have contributed to the increased relative concentration for fuel constituents. It is recommended that wells	ADEC agrees with the recommendation to sample Wells MWRP-08 and MWRP-09 in 2023 for additional information, and to collect and sample an additional set of surface water samples from Tank Tunnels 17 and 18 during a relatively high-water event to determine if the 2022 results were representative.

REVIEW

PROJECT: Rocky Point Management Area
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LOCATION: Amaknak Island, Unalaska, Alaska
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		<p>Additionally, in the annual report, please provide additional discussion on why the concentrations of surface water has been shown to increase in the last two years of sampling. Is this a difference in sampling method? Have cracks in the tanks allowed contamination from the surrounding area to enter the tanks?</p>	<p>MWRP-08 and MWRP-09 are added back into the sampling plan for 2023 to gather additional information. Further sampling of these wells will be re-evaluated after the receipt of 2023 sampling results. Additionally, it is recommended that another set of surface water samples be collected from Tank Tunnels 17 and 18 during a high-water event (preferably during the first quarter of the year) to determine if this was an anomalous result. We are seeking ADEC’s concurrence for this sampling at this time. The continued monthly inspections of the weirs will ensure that product remains within the tank tunnels.</p> <p>We will determine if additional evaluation is required to monitor trends or assess treatment options following high water-event surface water/groundwater monitoring of the tunnels for Tank 17 and 18.</p> <p>Discussion about Tank 17 concentrations will be added. See response to comment #6.</p>	
8.	Section 3	Pending the recommendations in the 2022 annual report, ADEC agrees with the annual sampling of surface water and with the removal of GRO and BTEX analytes from the surface water	Agreed. These recommendations will be included in the annual report.	Agree.

REVIEW **PROJECT: Rocky Point Management Area**
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LOCATION: Amaknak Island, Unalaska, Alaska
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		sampling. Please incorporate this recommendation in the 2022 annual groundwater monitoring report.		
9.		End of comments.		

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