



THE STATE  
*of* **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Department of Environmental  
Conservation

SPILL PREVENTION & RESPONSE  
Contaminated Sites Program

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File No.: 2601.38.002

March 3, 2023

**Electronic Delivery Only**

Matt Woods  
Engineering Services/ Federal Aviation Administration  
222 West 7<sup>th</sup> Ave. #14  
Anchorage, AK 99513

Subject: DECISION DOCUMENT: FAA Woody Island  
No Further Action Determination: Woody Island Dump

Dear Mr. Woods,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with the FAA Woody Island site, specifically the Woody Island Dump area of concern (AOC) located on Woody Island, east of Kodiak Island, Alaska. Based on the information provided to date, it has been determined that the contaminant concentrations remaining at the Woody Island Dump AOC do not pose an unacceptable risk to human health or the environment and no further remedial action will be required unless information becomes available that indicates residual contaminants may pose an unacceptable risk. This determination is limited to the Woody Island Dump AOC; the FAA Woody Island site will remain active until cleanup is completed at all AOCs.

This No Further Action determination is based on the administrative record for the FAA Woody Island site maintained by DEC. This decision letter summarizes the site history, cleanup actions and levels, and site closure conditions that apply.

**Site Name and Location**

Woody Island Dump  
57.776108, -152.336697  
Wood Island, Alaska

**DEC Site Identifiers**

File No. 2601.38.002  
Hazard ID 1320

**Name and Mailing Address of Contact Party**

Matt Woods  
Federal Aviation Administration  
222 West 7<sup>th</sup> Ave. #14  
Anchorage, AK 99513

**Regulatory Authority for Determination**

18 Alaska Administrative Code (AAC) 75

Source Area ID 81274

### Site Description and Background

Woody Island is located 1.5 miles east of Kodiak Island. The Federal Aviation Administration (FAA) constructed a navigation facility during World War II and manned operations at the facility ended in 1973. The FAA Woody Island Station site comprises of several areas of concern, including the communication transmitter area (CT). The Woody Island Dump AOC is referred to as the “CT Dump” in some documents. The CT area will be evaluated for its own contaminants of concern (COCs), separate from the Dump site. This letter only addresses the Dump site portion of the CT.

The Woody Island Dump site is located near the communication transmitter area where debris was scattered on the ground across an approximate 3-acre area. The bedrock in this area varies from about 3 to 13 feet below ground surface (bgs). Groundwater was not encountered during any excavation events at the CT Dump.

### Contaminants of Concern

During the site investigation and cleanup activities at this site, samples were collected from soil and analyzed for diesel range organics (DRO), residual range organics (RRO), total lead, and polychlorinated biphenyls (PCBs). Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern (COCs) at this AOC:

- Lead
- PCBs
- DRO
- RRO

### Cleanup Levels

Example language: Soil cleanup levels applicable to the site are the most stringent Method 2 cleanup levels for the over 40-inches of precipitation climate zone found in 18 AAC 75.341(c), Table B1 and 18 AAC 75.341(d), Table B2. Groundwater cleanup levels applicable to this site are found in 18 AAC 75.345, Table C.

**Table 1 – Approved Cleanup Levels**

Contaminant	18 AAC 75 Table B1 Soil Cleanup Level (mg/kg)	18 AAC 75 Table C Groundwater Cleanup Level µg/L
Lead	400	15
PCB	1.0	0.44
DRO	230	1500
RRO	9700	1100

mg/kg = milligrams per kilogram

µg/L = micrograms per liter

Samples collected at this site were analyzed for total lead, total PCBs, DRO, and RRO. No soil results exceeded the most stringent Method 2 cleanup levels for the over 40-inches of precipitation climate zone established 18 AAC 75.341(c), Table B1.

### **Characterization and Cleanup Activities**

The CT Dump site was identified during the 2009 ROST for Woody Island, but no investigative actions were taken. In 2018, the CT Dump had approximately 14,450 square feet excavated. Some of the materials removed from the site are burned debris, metal, asbestos, creosote piling, lead acid batteries, transformers, and capacitors. The excavated contaminated soils were placed in Super Sacks® and left until the spring of 2019 due to road conditions. From the 2018 soil samples, lead exceeded DEC cleanup levels that ranged from 402 milligrams per kilogram (mg/kg) to 690 mg/kg; PCBs exceeded cleanup levels that ranged from 1.22 mg/kg to 6,590 mg/kg.

Between the spring of 2019 and August 2021 a total of five rounds of additional excavation and hot spot removal occurred, with some CUL exceedances remaining after each of the first four rounds. . The third round PCB levels were below cleanup levels. The contaminated soils from the excavations were removed from the site and transported off Woody Island. The remaining levels of PCB, lead and DRO are included in Table 2.

**Table 2 – Maximum Contaminant Concentrations Remaining in Soil**

<b>Contaminant</b>	<b>Soil (mg/kg)</b>	<b>Sample Location</b>	<b>Date Sampled</b>
PCB	0.78	WDY21-PCB08-EX3-3SE(3)	8/8/2021
Lead	36.3	WDY21-PCB08-EX3-3SE(3)	8/8/2021
DRO	13.9 J	WDY21-PCB08-EX3-3SE(3)	8/8/2021
DRO	719	WDY-18-DP-POL03(2.5)	9/11/2018

### **Cumulative Risk Evaluation**

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index (HI) of 1 across all exposure pathways.

Based on a review of the environmental record, DEC has determined that residual contaminant concentrations meet the human health cumulative risk criteria for residential land use.

### **Exposure Pathway Evaluation**

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

**Table 3 – Exposure Pathway Evaluation**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Surface Soil Contact	De Minimis Exposure	Contamination in surface soil does not exceed cleanup levels.
Subsurface Soil Contact	De Minimis Exposure	Subsurface soil contamination does not exceed human health cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	There are no contaminants in soil volatile enough to reach outdoor air.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings present at this location.
Groundwater Ingestion	De Minimis Exposure	Groundwater was not encountered at this location and the volume of soil exceeding migration to groundwater CULs was de minimis.
Surface Water Ingestion	Pathway Incomplete	Surface water is not present at this site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Amount of remaining lead is minimal.
Exposure to Ecological Receptors	Pathway Incomplete	The minimal amount of contaminants are not expected to cause an unacceptable risk to the aquatic or terrestrial routes.

**Notes:**

1. “De Minimis Exposure” means that, in DEC’s judgment, the receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination.
2. “Pathway Incomplete” means that, in DEC’s judgment, the contamination has no potential to contact receptors.
3. “Exposure Controlled” means there is an IC in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

**DEC Decision**

Soil contamination at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. The Woody Island Dump AOC will receive a “No Further Action” designation on the Contaminated Sites Database.

DEC approval is required for movement and disposal of soil and/or groundwater subject to the Site Cleanup Rules, in accordance with 18 AAC 75.325(i). Since the cleanup at this site met the most stringent cleanup levels of 18 AAC 75.341, Tables B1 and B2 and 18 AAC 75.345, Table C, this letter will serve as your approval for future movement and disposal of soil associated with this release.

Movement or use of contaminated material in an ecologically sensitive area or in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. Furthermore, groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. If, in the future, groundwater from this site is to be used for other purposes, additional testing and treatment may be required to ensure the water is suitable for its intended use.

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

**Informal Reviews and Adjudicatory Hearings**

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

If you have questions about this closure decision, please contact me at (907) 269-3094, or via email at [arika.garcia@alaska.gov](mailto:arika.garcia@alaska.gov).

Sincerely,



Arika Garcia  
Environmental Program Specialist

cc, via email: DEC, Division of Spill Prevention and Response, Cost Recovery Unit  
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