

Proposed Plan for No Action

Atka Air Force Auxiliary Field FUDS on Atka, Alaska



US Army Corps
of Engineers®



Virtual Public Meeting

Tuesday, August 20, 2024
@ 5 PM HDT Hawaii/Aleutians
6 PM AKDT Alaska
MS Teams meeting details:
<https://tinyurl.com/Atka-FUDS>
Meeting ID: 224 044 801 577
Passcode: AJAYvC
or call (907) 308-8052
Conference ID: 875 512 605#

Public Comment Period

August 9 to September 23, 2024

You are encouraged to comment on this Proposed Plan. The USACE will accept written, email, and voicemail comments during the public comment period, as well as verbal comments provided during the public meeting. A pre-addressed form is included with this document. All comment letters must be postmarked by September 23, 2024.

Submit comments to:

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The information summarized in this No Action under CERCLA Proposed Plan can be found in greater detail in the RI/RA Report and other documents contained in the Administrative Record file for this site, which is housed at the Tribal Council Office on 362 Chavichax Lane, Atka. USACE encourages the public to review these documents to gain a more comprehensive understanding of the Atka AF AUX FLD and the response activities that have been conducted at 293 features of interest, which are a subset of those included within the FUDS property.

Your participation and comments are encouraged.

USACE ANNOUNCES PROPOSED PLAN

The U.S. Army Corps of Engineers (USACE) requests your comments on this Proposed Plan for 293 features located within areas of interest at the Atka Air Force Auxiliary Field (AF AUX FLD) Formerly Used Defense Sites (FUDS) Property located on Atka Island, Alaska (Figure 1).

USACE is issuing this Proposed Plan as part of its public participation responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Proposed Plan is a component of the requirements of Section 117(a) of CERCLA, also known as Superfund (42 United States Code § 9601 et al.). The Atka AF AUX FLD is not listed on the National Priority List.

PURPOSE

The purpose of this Proposed Plan is to:

- Communicate the environmental conditions and risks posed by each of the 293 features of interest;
- Specify cleanup criteria;
- Describe the investigations, remedial actions, and removal actions conducted;
- Summarize the proposed decision of no action for the site;
- Request public comment on the proposed decision; and
- Provide information on how the public can provide input to the decision-making process.

This Proposed Plan was prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and follows the requirements from the Engineering Regulation 200-3-1, FUDS Program Policy (USACE 2020) and U.S. Environmental Protection Agency (EPA) guidance (EPA 1994, 1999). The U.S. Department of Defense (DoD) is authorized to carry out a program of environmental restoration at former military sites under the Defense Environmental Restoration Program (DERP), 10 United States Code 2700 et seq., which includes cleanup efforts at FUDS.

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FORMERLY USED DEFENSE SITES

A FUDS property is a facility or site that was under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States that was transferred from DoD control prior to October 17, 1986. The FUDS program includes former Army, Navy, Marine Corps, Air Force, and other defense-used properties that now range from privately owned lands to state or Federal lands such as national parks as well as residential land, schools, and industrial parks. Approximately 533 FUDS-eligible properties have been identified in Alaska.

This Proposed Plan addresses CERCLA eligible contamination. Petroleum, oil and lubricants (POLs) are excluded from CERCLA, but may be addressed under the authority of the DERP-FUDS (10 United States Code 2700 et seq.) if POL contamination poses an imminent and substantial endangerment to public health, welfare, or the environment. POL contamination at the Atka AF Aux FLD will be addressed under a separate project. The proposed decision for all 293 features presented in this Proposed Plan is No Action under CERCLA.

The public is encouraged to review and comment on the proposed alternative presented in this No Action under CERCLA Proposed Plan. After considering all public comments, USACE will prepare a Record of Decision describing the decision that includes responses to all significant public comments. Changes to the proposed approach may be made through this comment review process, which highlights the importance of community involvement. A more in-depth look at the features investigated can be found in the 2019 remedial investigation (RI) and risk assessment (RA), which are available as part of the Administrative Record.

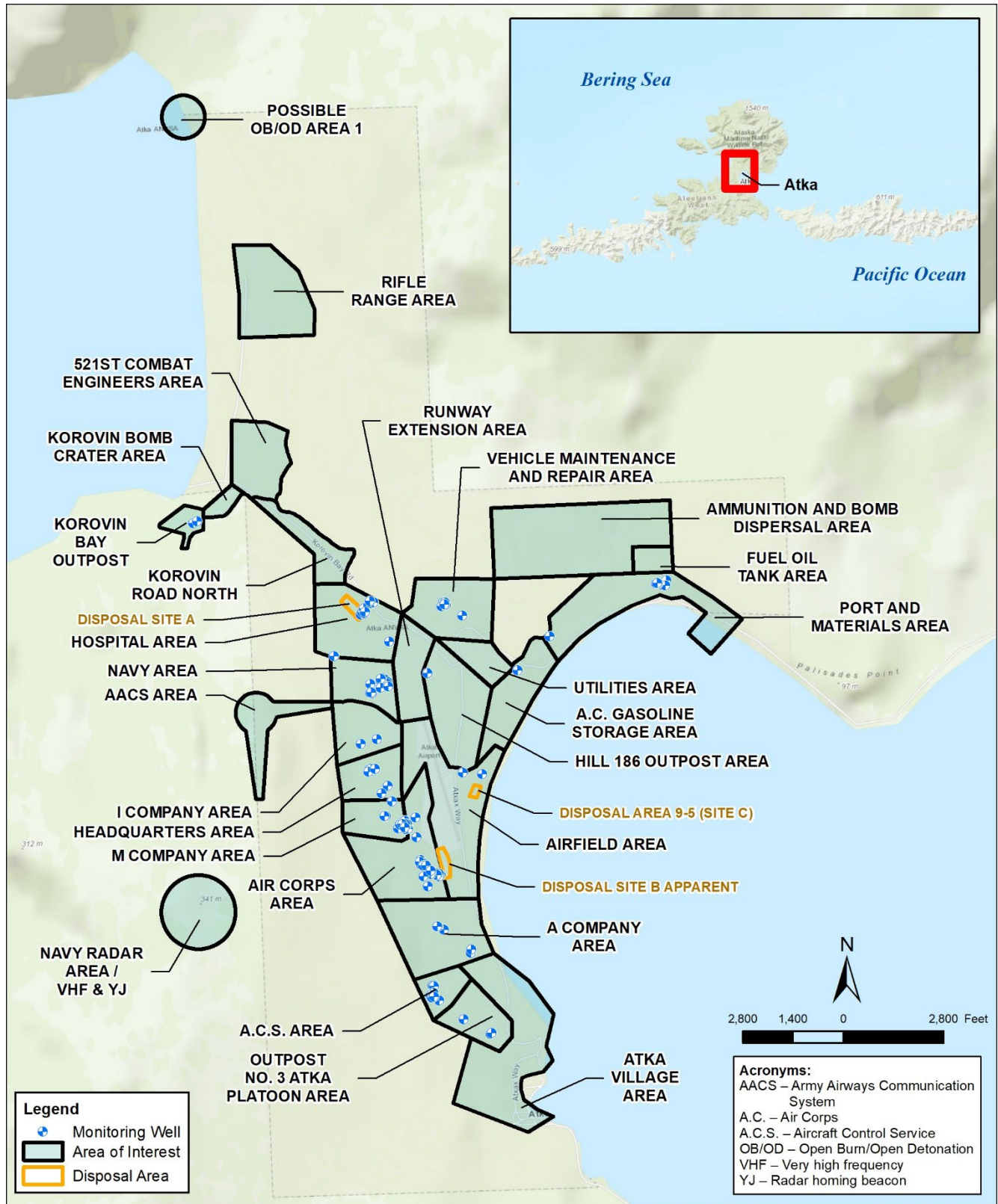
SITE LOCATION AND HISTORY

The Atka AF AUX FLD (site) is located on Atka Island in the Andreanof Islands of the Aleutian Archipelago (latitude 52°13'43" North and longitude 174°12'19" West) (Figure 1). The island is approximately 1,100 miles southwest of Anchorage, Alaska, and 110 miles northeast of Adak Island, Alaska (Figure 1). The site is located between Nazan Bay on the east and Korovin Bay on the northwest side of the island. Access to Atka Island is by commercial or chartered airplane via Dutch Harbor and access to the site from the City of Atka is by foot or utility vehicle. Most of the features evaluated were off roads and trails and required movement across tundra.

The nearest inhabited area is the City of Atka, located more than a mile from the site runway, which has a population of 53 (State of Alaska, Department of Labor 2021). The majority of Atka Island is undeveloped, and the economy is primarily based on subsistence living and fishing (USACE 2009). Land uses in the area surrounding the site are primarily recreation and subsistence harvesting and hunting with some residential and commercial use. Future land uses are likely to remain unchanged. City of Atka residents obtain their water supply from a stream located south-southwest of the community.



Atka, Nazan Bay, and the Atka AF AUX FLD FUDS



Note: The Korovin Bomb Crater Area, Rifle Range Area, and Possible OB/OD Area 1 have been addressed under the Military Munitions Response Program.

Figure 1 — Areas of Interest

Environmental Setting

Atka Island has two distinct geographical regions. The southwestern portion is a geologically older eroded area while the northeastern portion, where the site is located, is younger and more rugged. Two volcanoes, Mount Kliuchef and Korovin Volcano, are located north of the site. Mount Kliuchef is dormant, and Korovin Volcano is active with frequent seismic activity and volcanic tremors. Bedrock on the island consists of basalts, andesites, and breccias. Soils on the island are derived from the weathered byproducts of the volcanic rocks (USACE 1999). Where present, groundwater depth below ground surface (bgs) is variable depending on localized conditions and ranges from 1 to 35 feet bgs. Lakes and ponds occur in most topographic depressions, and small streams flow from the highlands down to the island shoreline.

Vegetation on the island includes various Arctic and alpine species of mosses, bryophytes, grasses, and other low-growing plants. Trees are not native to Atka, and any that exist there now have been introduced. At 1,000 feet above sea level, vegetation becomes sparse because of exposure to very high winds (USACE 1999).

The surrounding marine environment supports commercial and subsistence fishing for a variety of fish and shellfish species. Bird species of Atka Island include bald eagles, ravens, rock ptarmigan, puffins, and other seabirds. Reindeer were introduced on Atka Island in 1914; several thousand now roam the island and are a source of food for the residents. Introduced foxes are also common throughout the island. Marine mammals, including sea otters, sea lions, and seals, can be found along the coast (USACE 1999).

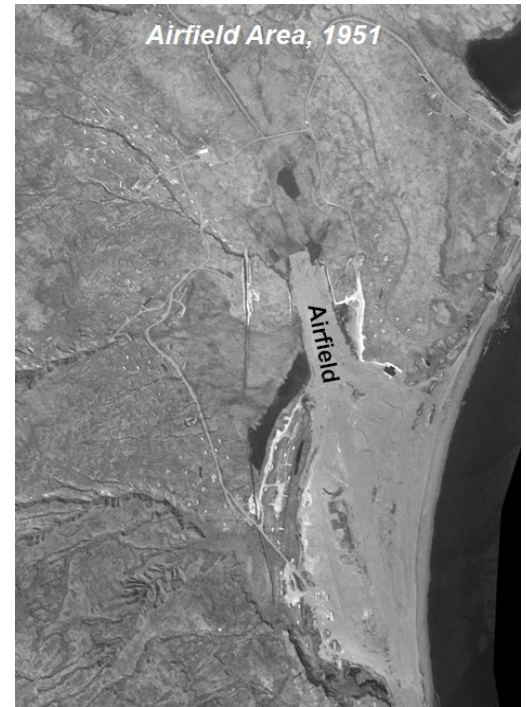
Site History

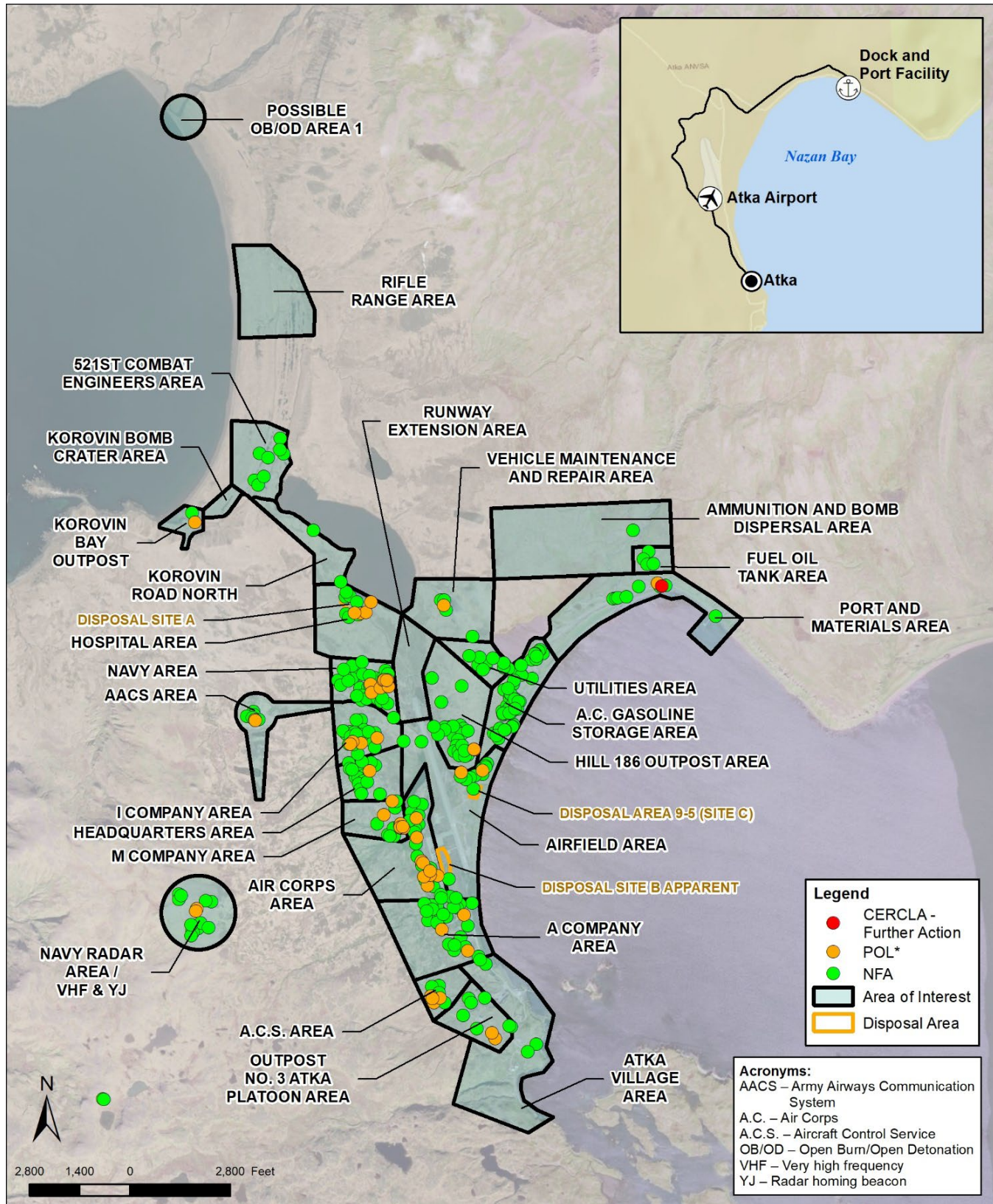
In 1913, Atka Island became part of the Aleutian Islands National Wildlife Refuge via Executive Order (EO) 1733. EO 1733 stated that the establishment of the refuge “shall not interfere with the use of the islands for lighthouse, military, or naval purposes, or with the extension of the work of the Bureau of Education on Unalaska and Atka Islands,” which may have created an implied use permit for military operations during World War II.

During World War II, in September 1942, the U.S. Department of War acquired 6,800 land acres on Atka Island by implied transfer from the Department of the Interior (USACE 2019). The 83 inhabitants of Atka Island were interned by the U.S. government and eventually resettled in Southeast Alaska on Killisnoo Island. On September 10, 1942, the Army Air Force initiated construction of the military installation, including a 3,000-foot-long runway made of Marston matting. A naval air facility was established at Atka by the Eleventh Air Force on November 20, 1942, and the runway was completed on December 27, 1942. The Atka base was intended for long-range fighter and medium bomber operations against Japanese-held Kiska Island. Atka was reestablished as an auxiliary air facility on February 13, 1943. On September 1, 1943, the naval air facility was decommissioned, and a weather unit remained as the only naval activity (USACE 2019). Atka was primarily used for weather and radio communications and as a waystation between Fort Glenn on Umnak Island and Adak Island.

Improvements at Atka included an airfield, hangar, dock, housing and storage facilities, and radio range outputs (USACE 2019). However, adverse weather, lack of materials, and poor docking facilities hampered work, and the higher priority of westward stations such as the one on Adak Island curtailed development. The resulting lack of materials halted construction of permanent facilities and forced the use of prefabricated structures. Improvements were abandoned in place when the site was vacated circa 1945–1946.

The Air Force relinquished the Atka AF AUX FLD to the Department of the Interior on October 22, 1953. Subject to the implied transfer for military use, Atka Island remained a part of the Aleutian Islands National Wildlife Refuge (which became part of the Alaska Maritime National Wildlife Refuge in 1980). The surface estate was made available for selection under the Alaska Native Claims Settlement Act of 1971. The Department of the Interior transferred the site to the Atxam Native Corporation by Interim Conveyance No. 159 dated February 27, 1979, and the Atxam Native Corporation remains the predominant property owner (Alaska Department of Natural Resources 2020). The Alaska Department of Transportation & Public Facilities (ADOT&PF) owns the airfield and adjacent taxiway at the City of Atka airport (Figure 2).





*Note: POL features will be addressed under a separate project and are not included in this No Action Under CERCLA Proposed Plan.

Figure 2 — Features of Interest

PREVIOUS INVESTIGATION RESULTS

Environmental investigations at the site have been ongoing since 1977 (USACE 1977, 1979, 1999, 2006; Berg 1986; DOI 1995; ODUSD-ES/EQ 2001; ADOT&PF 2002; EPA 2002). A 1986 FUDS debris cleanup and site restoration removed more than 400 structures and miscellaneous debris. (USACE 2019). Three permitted solid waste disposal sites (Disposal Sites A, B, and C) were created. Wastes were not segregated prior to disposal.

In 2014, USACE developed a historical geospatial analysis with geographical information system (GIS) data for the site (USACE 2014). The report documented 28 unique geographical areas of interest (AOIs) affected by historical military activities at the site (Figure 1). Within those AOIs, 1,891 individual features were identified.

RI efforts occurred in four phases. The 2015 Sitewide RI (Phase I) evaluated the condition of three disposal sites, verified and inspected features from previous military operations, determined whether additional investigations were warranted, and evaluated logistics for conducting follow-on RI phases (USACE 2016). Of the original 1,891 features, 354 showed clear evidence of potential environmental impacts warranting further investigation. A sitewide RI/RA was conducted from 2016 to 2018 (Phases II, III, and IV) as a follow-on effort to investigate and assess the 354 features identified as potential sources of contamination from previous military operations. In some locations, adjacent features were consolidated and investigated as groups. The 354 individual features became 339 features, as presented in the RI feature reports (Appendices L, M, and N of the RI Report).

During the RI, each feature, or feature group, was evaluated based on former source areas, potential contaminants, and physical characteristics. The investigation approach for each feature varied based on its potential for contamination. In some instances, observations and historical evidence were supplemented by geophysical methods to find or rule out subsurface metallic debris. Field screening devices were used to guide analytical sampling for fuels, volatiles, and lead. At features with minimal or no field screening response, soil samples were collected to confirm the absence of contamination. However, if field screening results appeared elevated, both discrete and composite soil samples were collected for characterization.

In addition to the RI, a Site Inspection was conducted in 2017 under the Military Munitions Response Program (MMRP) to investigate munitions-related debris remaining from World War II at the Rifle Range Area. An additional 13 AOIs were also inspected to determine their eligibility for future inclusion in the FUDS MMRP. One location known as the 521st Combat Engineers Area contained numerous craters, significantly elevated subsurface anomalies, and Munitions Debris (MD) identified on the surface and will advance to Remedial Investigation. The remaining locations require no further action and have undergone project closeout.

Contaminants of Potential Concern

Soil, groundwater, surface water, and sediment were sampled for POL and CERCLA hazardous substances, depending on site use at each feature. These contaminants included gasoline-range organics (GRO); diesel-range organics (DRO); residual-range organics (RRO); volatile organic compounds (VOCs), including benzene, toluene, ethylbenzene, and xylenes (BTEX); polycyclic aromatic hydrocarbons (PAHs); polychlorinated biphenyls (PCBs); and metals. Monitoring wells were installed for groundwater sampling (Figure 1).

The RI used the most conservative screening level from multiple Federal and State sources per analyte per medium; the selected value was equal to or more conservative than Alaska Department of Environmental Conservation (ADEC) cleanup levels (soil, groundwater, surface water) and EPA maximum contaminant levels (groundwater) for residential receptors.

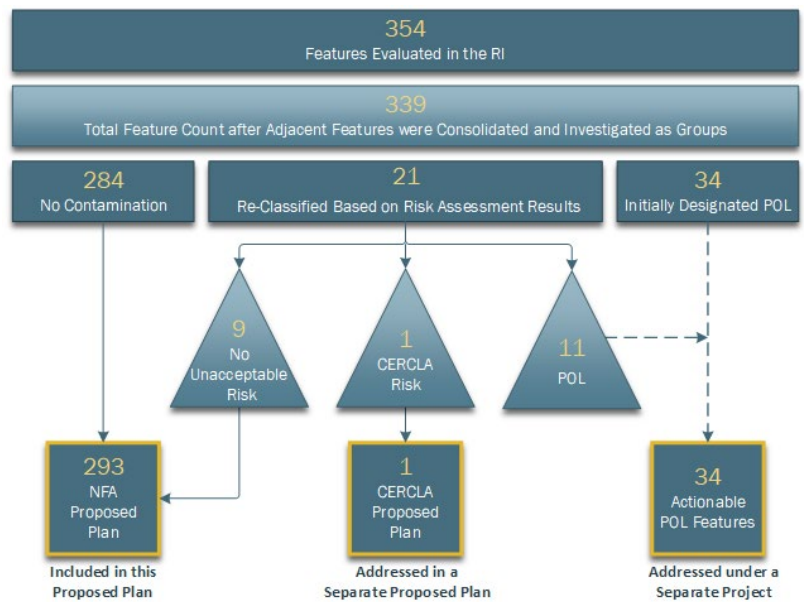


Diagram 1 – Current Status of Each Feature

Contamination in soil, groundwater, surface water, and sediment was identified at the site. Based on RI results, features were recommended and categorized as CERCLA, POL, or no further action (NFA). CERCLA and POL features were included in a quantitative assessment of risk. Following completion of the risk assessments, all but one CERCLA feature were recategorized as either POL or NFA. The 293 features addressed in this Proposed Plan were either determined to require no action or showed acceptable risk under CERCLA (Diagram 1). The current designation for each feature is depicted on Figure 2. Features designated as POL following completion of the risk assessments, as presented in Table 10-2 of the RI, are not included in this Proposed Plan. POLs are excluded from CERCLA but may be addressed under the authority of the DERP-FUDS (United States Code, Title 10, Section 2701, et seq.) if POL contamination poses an imminent and substantial endangerment to public health, welfare, or the environment. POL contamination at the Atka AF Aux FLD will be addressed under a separate project.

Four Areas of Interest were not included in the RI:

Addressed under the MMRP

- The Korovin Bomb Crater Area
- Rifle Range Area
- Possible Open Burn / Open Detonation (OB/OD) Area 1

No features identified for investigation during Phase I of the RI

- Runway Extension Area

Although not Areas of Interest, disposal sites were investigated during Phase I of the RI, but no features were identified for further investigation:

Managed by ADEC Division of Environmental Health Solid Waste Program under Permit No. 8521-BAO23

- 1986 Disposal Sites (A, B, and C)

SITE CHARACTERISTICS

Table 1 summarizes the RI results for the AOIs included in this No Action under CERCLA Proposed Plan.

Table 1 – Summary for No Action Features

Area of Interest	Feature Type ^a	Rationale for No Action Under CERCLA					
521 st Combat Engineers Area (CEG)	Unknown Building, Warehouses, Tent Sites	Soil field screening had no surface (soil 0 to 2 feet bgs) or subsurface (soil >2 feet bgs) fuel response. Results from discrete analytical soil samples collected from the surface and composite analytical surface soil samples collected from a stressed vegetation area did not exceed RI screening levels.					
		Features Evaluated	Analytical Sampling				
		8	Soil (< 2')	Soil (>2')	GW	SED	SW
		✓					
A Company Area (ACO) ^b	Barracks, Submarine Cable Test Building, Debris, Drums, Tent Sites, Unknown Building	Minimal soil field screening responses were observed during initial investigation efforts at drum ACO-DR-010 and barracks ACO-BG-012. Chloroform detections in soil were attributed to laboratory contamination. Results from several composite analytical soil samples from additional features were below RI screening levels. Soil from creosote pole debris at ACO-BG-012 contained PAHs at concentrations above the RI screening levels, but within the acceptable risk range (ILCR = 10 ⁻⁴ to 10 ⁻⁶ or HI ≤ 1). Although analytical sediment sample results were below RI screening levels, PAH concentrations in one analytical surface water sample from ACO-DR-010 were above ADEC Table C groundwater criteria.					
		Features Evaluated	Analytical Sampling				
		26	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓		✓	✓	

Table 1 – Summary for No Action Features

Army Airways Communication System (AACCS) Area ^b	Mess Hall, Transmitter Building, Antenna/Tower, Drums	Soil field screening at AAC-BG-001 mess hall had no surface or subsurface fuel response. Soil field screening at AAC-DR-001 drum feature showed a relatively weak potential fuel signature. No RI screening level exceedances were reported in analytical surface or subsurface soil samples at either feature. Five-point composite analytical soil sample results at the other four features were also below RI screening levels. Former antenna area AAC-TW-003, which contained stressed vegetation and debris, had lead concentrations in surface and subsurface soil above RI and ecological screening levels (maximum of 875 mg/kg in surface soil). This screening level exceedance was confined to a small area, and follow-on analytical sampling across the impacted area (i.e., ISM sampling) resulted in an exposure point concentration of 14.86 mg/kg, which is less than the applicable screening levels. Therefore, there is no unacceptable risk to human or ecological receptors at AAC-TW-003.					
		Features Evaluated	Analytical Sampling				
		6	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓				
Air Corps (AC) Gasoline Storage Area (AGS)	Former ASTs, Emergency Fuel Outlets, Pipeline Fill Stands, Pipeline Valves and Valve Pits, Water Separator, Ground Scar, Debris, Drums	Soil field screening had no surface or subsurface fuel response except at fuel outlet feature AGS-FS-001. Soil field screening for lead likewise had no response. Discrete and composite analytical soil sample results were below RI screening levels. No exceedances were reported in the one analytical surface water sample collected from a downgradient pond.					
		Features Evaluated	Analytical Sampling				
		48	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓			✓	
Aircraft Control Service (A.C.S.) Area	Barracks, Ground Scar	Only surface soil samples were collected from the three features, and all results were below RI screening levels.					
		Features Evaluated	Analytical Sampling				
		3	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓					
Air Corps Area (ARC) ^b	Barracks, Debris, Dispensary, Drums, Ground Scars	No fuel signatures were observed in soil except at ARC-BG-016. Surface and subsurface analytical soil sample results were below screening levels at ARC-BG-016, and an anomaly that was observed using geophysics was later identified as metal sheeting. Chloroform concentrations in groundwater exceeded RI screening levels but not risk thresholds. The chloroform exceedance was attributed to laboratory contamination. Analytical soil sample results from all other features were less than screening levels. The presence of chloromethane, bromomethane, and methylene chloride in soil were attributed to lab contamination. Although the lead concentration in soil at ground scar feature ARC-GS-004 was above the ecological screening level, subsequent and step-out samples were below RI and ecological screening levels.					
		Features Evaluated	Analytical Sampling				
		21	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓				

Table 1 – Summary for No Action Features

Airfield Area (AIR) ^b	Barracks, Communications Building, Crew Chief Shelter, Drainage Ditch, Drums, Lube Building, Powerhouse, Warehouse, Unknown Building	No fuel signatures were observed in soil at the features except at AIR-BG-003. An intact and cylindrical metallic object that was observed with geophysical methods at AIR-BG-003 was later identified as thin corrugated metal. AIR-BG-003 analytical soil results were less than RI screening levels. All other features had analytical soil sample results less than screening levels except bromomethane, chloroform, chloromethane, and methylene chloride, which are common laboratory contaminants. Two features were screened for lead in soil: AIR-BG-007 and AIR-UK-001. No response was reported from AIR-BG-007, and lead concentrations in analytical surface soil samples were below the RI screening levels. Although lead concentrations at AIR-UK-001 exceeded the ecological screening level, the exceedances were confined to a small area, and the results from follow-on sampling across the impacted area did not exceed its ecological screening level. No human health COPCs were identified, and additional ecological risk screening was deemed unnecessary. The results from an analytical groundwater sample collected near the former lube building feature AIR-BG-005 did not exceed RI screening levels.				
		Features Evaluated		Analytical Sampling		
		15	Soil (< 2')	Soil (> 2')	GW	SED
		✓	✓	✓		
Ammunition and Bomb Dispersal (ABD)	Unknown	Results from one composite analytical surface soil sample were below RI screening levels.				
		Features Evaluated		Analytical Sampling		
		1	Soil (< 2')	Soil (> 2')	GW	SED
		✓				
Atka Platoon Area (AKP)	Barracks, Drums, Possible Foxhole, Tent Sites, Trench	Soil field screening indicated no surface or subsurface fuel response. Soil analytical results were below RI screening levels except for bromomethane, which is a common laboratory contaminant.				
		Features Evaluated		Analytical Sampling		
		7	Soil (< 2')	Soil (> 2')	GW	SED
		✓	✓			
Atka Village Area (AKV)	Drums, Dump Site	Soil field screening had no surface or subsurface fuel response except at drum site AKV-DR-019; step-out probes had no fuel signatures, and analytical results were below RI screening levels except chloroform, which is a common laboratory contaminant.				
		Features Evaluated		Analytical Sampling		
		4	Soil (< 2')	Soil (> 2')	GW	SED
		✓	✓			
Fuel Oil Tank Area (FOT)	Former ASTs	Soil field screening had no surface or subsurface fuel response except at former AST FOT-AT-004. Analytical surface and subsurface soil sample results were below RI screening levels.				
		Features Evaluated		Analytical Sampling		
		4	Soil (< 2')	Soil (> 2')	GW	SED
		✓	✓			



Drilling at FOT-AT-003

Table 1 – Summary for No Action Features

Headquarters Area (HQA)	Administration and Supply Building, Barracks, Decontamination Station, Drying Room, Radio and Transmitter Building, Ground Scar, Recreation Office, Tent Sites, Unknown Building	Geophysical investigations were conducted at three features: HQA-BG-002, HQA-TN-007, and HQA-TN-008. HQA-BG-002 was excavated and corrugated metal building material and other debris were uncovered. Results from the geophysical investigations at the other two features did not identify buried metallic waste materials. Soil field screening had no surface or subsurface fuel response at any features. Soil analytical sample results were below RI screening levels. A groundwater well was installed and sampled at HQA-BG-014; analytical groundwater sample results were also below RI screening levels.					
		Features Evaluated	Analytical Sampling				
		17	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓	✓			
Hill 186 Outpost Area (HOP)	Barracks, Ground Scar, Mess Hall, Possible Foxhole, Receiver Station Building, Tent Sites, Warehouse, Unknown Building	Geophysical investigations were conducted at one feature: HOP-BG-010. It was found to contain corrugated metal, wood, and a pipe with electrical wires. Soil field screening had no surface or subsurface fuel response at any features. Analytical surface and subsurface soil sample results were below RI screening levels except chloroform, which is a common laboratory contaminant.					
		Features Evaluated	Analytical Sampling				
		24	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓				
I Company Area (ICO) ^b	Administration Building, Barracks, Debris, Ground Scar, Possible Foxhole, Recreational Building, Tent Sites, Warehouse	Geophysical investigations were conducted at two features: ICO-BG-009, where no subsurface metallic anomalies were identified, and ICO-BG-015, where metallic anomalies were later identified as corrugated metal and wood debris. Soil field screening did not suggest surface or subsurface fuel releases at any feature, including those where stressed vegetation was present. Analytical surface and subsurface soil sample results were below RI screening levels except bromomethane and/or chloroform, which are common laboratory contaminants. Analytical lead concentrations in soil from the areas of highest field screening responses were all below RI screening levels. Although one result exceeded an ecological screening level, the ecological risk at the associated feature (ICO-TN-014) was acceptable (HI ≤ 1). Results from analytical surface water and sediment samples collected where sheen was observed at ICO-BG-006 were below RI screening levels except benzo(a)anthracene in surface water, which had no associated soil contamination, and therefore does not appear to be related to FUDS activities.					
		Features Evaluated	Analytical Sampling				
		25	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓		✓	✓	
Hospital Area (HSP) ^b	Bath Building, Boiler Plant Building, Hospital Ward, Powerhouse, Storehouse	Soil field screening had no surface or subsurface fuel response. All other features had analytical surface and subsurface soil sample results below RI screening levels. Chloroform in a soil sample at HSP-BG-020 was attributed to laboratory contamination.					
		Features Evaluated	Analytical Sampling				
		7	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓	✓				
Korovin Bay Outpost Area (KOP)	Storehouse	Soil field screening had no surface or subsurface fuel response. Analytical surface soil sample results were below RI screening levels.					
		Features Evaluated	Analytical Sampling				
		1	Soil (< 2')	Soil (> 2')	GW	SED	SW
		✓					

Table 1 – Summary for No Action Features



Korovin Road North Area (KRN)	Powerhouse, Warehouse	Soil field screening had no surface or subsurface fuel response. Analytical surface soil sample results were below RI screening levels except chloroform, which is a common laboratory contaminant.																		
		<table border="1"> <thead> <tr> <th>Features Evaluated</th> <th colspan="5">Analytical Sampling</th> </tr> <tr> <th></th> <th>Soil (< 2')</th> <th>Soil (> 2')</th> <th>GW</th> <th>SED</th> <th>SW</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Features Evaluated	Analytical Sampling						Soil (< 2')	Soil (> 2')	GW	SED	SW	2	✓				
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	Soil (< 2')	Soil (> 2')	GW	SED	SW															
2	✓																			
M Company Area (MCO) ^b	Barracks, Drums, Utility Ditch, Powerhouse, Radio Transmitter Building, Warehouse	Soil composite sampling efforts did not exceed applicable screening levels. No surface soil exceedances were reported from the other features except for chloroform, which is a common laboratory contaminant.																		
		<table border="1"> <thead> <tr> <th>Features Evaluated</th> <th colspan="5">Analytical Sampling</th> </tr> <tr> <th></th> <th>Soil (< 2')</th> <th>Soil (> 2')</th> <th>GW</th> <th>SED</th> <th>SW</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Features Evaluated	Analytical Sampling						Soil (< 2')	Soil (> 2')	GW	SED	SW	7	✓				
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7	✓																			
Navy Area (NAVY) ^b	Bakery, Barracks, Debris, Generator Building, Ground Scars, Mess Hall, Public Works Building, Radio Receiver Building, Refrigeration Building, Unknown Buildings/ Structures, Valve Pit	Soil field screening had no surface or subsurface fuel response. Analytical surface and subsurface soil sample results were below RI screening levels except bromomethane and chloroform, which are common laboratory contaminants.																		
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		Features Evaluated	Analytical Sampling																	
	Soil (< 2')	Soil (> 2')	GW	SED	SW															
32	✓	✓																		
Navy Radar Area (VHF)	Barracks, Debris, Drums, Mess Hall, Radar Pole, Recreation Building, Transmitter Building, Unknown Materials	No fuel signatures were observed in soil at any of these features, including at areas of stressed vegetation. Upon analytical soil sampling, all results were below applicable screening levels except methylene chloride, a common laboratory contaminant.																		
		<table border="1"> <thead> <tr> <th>Features Evaluated</th> <th colspan="5">Analytical Sampling</th> </tr> <tr> <th></th> <th>Soil (< 2')</th> <th>Soil (> 2')</th> <th>GW</th> <th>SED</th> <th>SW</th> </tr> </thead> <tbody> <tr> <td>14</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Features Evaluated	Analytical Sampling						Soil (< 2')	Soil (> 2')	GW	SED	SW	14	✓				
		Features Evaluated	Analytical Sampling																	
	Soil (< 2')	Soil (> 2')	GW	SED	SW															
14	✓																			
Port and Materials Area (PMA) ^b	Storage Building, Storage Yard, Pipeline, Emergency Fuel Outlet, Fuel System Valve, Water Trap	Soil field screening had a potential fuel response at one feature, PMA-SA-001. PAH concentrations in analytical surface and subsurface soil samples at PMA-SA-001 and PMA-BG-005 exceeded the RI screening levels, but were below the most stringent ADEC cleanup levels. Both were within the acceptable risk range and below the HI threshold (ILCR = 10 ⁻⁴ to 10 ⁻⁶ or HI ≤ 1). Chloroform was also detected above the RI screening level but is a common laboratory contaminant. Relatively low levels of fuels and lead were detected but did not exceed RI screening levels at other features. All groundwater results were less than RI screening levels.																		
		 <p><i>PMA-SA-001 Drilling by Creosote Pole</i></p>																		
		<table border="1"> <thead> <tr> <th>Features Evaluated</th> <th colspan="5">Analytical Sampling</th> </tr> <tr> <th></th> <th>Soil (< 2')</th> <th>Soil (> 2')</th> <th>GW</th> <th>SED</th> <th>SW</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>✓</td> <td>✓</td> <td>✓</td> <td></td> <td></td> </tr> </tbody> </table>	Features Evaluated	Analytical Sampling						Soil (< 2')	Soil (> 2')	GW	SED	SW	7	✓	✓	✓		
Features Evaluated	Analytical Sampling																			
	Soil (< 2')	Soil (> 2')	GW	SED	SW															
7	✓	✓	✓																	

Table 1 – Summary for No Action Features

Utilities Area (UTA) ^a	Carpenter Shop, Debris, Oil House Building, Unknown Linear Feature, Recreation Office, Tent Site, Warehouse, Unknown Building	<p>Soil field screening had a potential fuel response at three features: UTA-BG-004, UTA-BG-007, and UTA-BG-010. Analytical surface soil sample results were below RI screening levels except for bromomethane, which is a common laboratory contaminant. One analytical soil sample at UTA-BG-002 had a lead concentration that exceeded the ecological screening level. However, this screening level exceedance was confined to a small area, and results from follow-on sampling across the impacted area did not exceed screening levels. No human health COPCs were identified, and ecological risk was determined to be acceptable (HI ≤ 1).</p>  <p style="text-align: right;"><i>UTA-BG-004 Overview</i></p>				
		Features Evaluated		Analytical Sampling		
		10	Soil (< 2')	Soil (> 2')	GW	SED
	✓	✓				
Vehicle Maintenance and Repair (VMR) ^b	Ground Scars, Possible Hazardous Waste Site, Unknown Feature	<p>A geophysical investigation at VMR-GS-008 did not find subsurface metallic anomalies. Soil field screening had no surface or subsurface fuel response, including at areas with stressed vegetation. All analytical surface and subsurface soil sample results were below RI screening levels except chloroform, which is a common laboratory contaminant.</p>				
		Features Evaluated		Analytical Sampling		
		4	Soil (< 2')	Soil (> 2')	GW	SED
	✓	✓				

Notes:

^a All structures have been removed from the site; buildings and facilities should be considered former with only foundations remaining.

^b One or more features showed acceptable risk under CERCLA and therefore proposed for no action.

Detailed information for all features can be found in the Final RI/RA Report (USACE 2019). Please refer to Table 10-1 of the RI for CERCLA feature risks and Table 10-2 of the RI for petroleum feature risks. Petroleum features are not included in this No Action Under CERCLA Proposed Plan.

- AST = aboveground storage tank
- COPC = contaminant of potential concern
- GW = groundwater
- HI = hazard index
- ILCR = incremental lifetime cancer risk

- ISM = incremental sampling methodology
- mg/kg = milligram(s) per kilogram
- SED = sediment
- SW = surface water





Using hand UVOST probe at HQA-BG-002



AKV-DR-007 Site Overview

CERCLA Nature and Extent of Contamination

The results of the RI delineated the nature and extent of contamination and indicated that VOCs and lead were present but showed no unacceptable risk. The only VOCs detected above RI screening levels in soil samples were common laboratory contaminants and included bromomethane, chloroform, chloromethane, and methylene chloride.

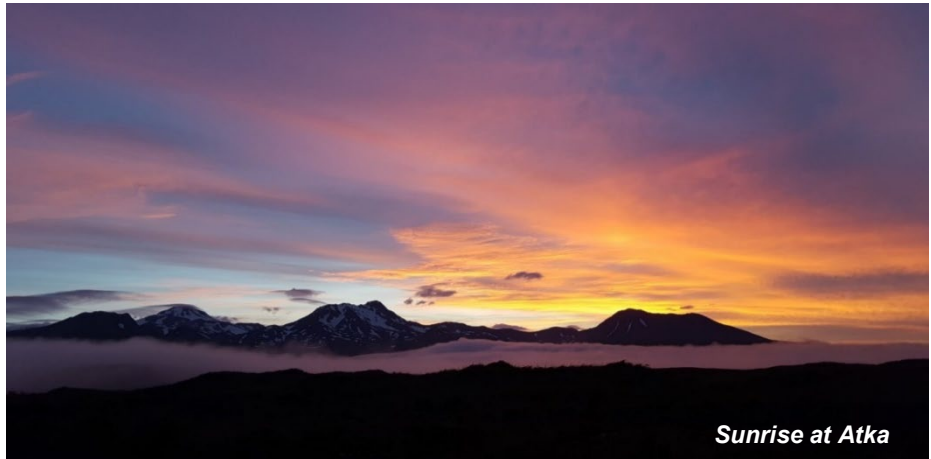
PAHs in soil and groundwater often exceeded the most stringent RI screening levels; however, only concentrations of benzo(a)anthracene, benzo(a)pyrene, and naphthalene exceeded ADEC migration to groundwater or human health soil cleanup levels. All PAH concentrations in groundwater were below ADEC Table C cleanup levels. Only the benzo(a)pyrene concentration at ACO-BG-012 (1.5 mg/kg) exceeded the ADEC human health cleanup level of 1.2 mg/kg but not the migration to groundwater cleanup level of 1.9 mg/kg. PAHs at this feature were isolated, and the extent of PAHs in soil was delineated laterally and vertically. The presence of PAHs showed no unacceptable risk. Complete results are available in the RI/RA Report (USACE 2019).

COMMUNITY PARTICIPATION

The final response action alternative will be selected for the site after community comments have been considered. In this final step of the remedy selection process, the lead agency reassesses its initial determination that the proposed decision provides the best balance of trade-offs while factoring in any new information or points of view expressed by the state or the community during the public comment period.

USACE encourages the public to gain a more comprehensive understanding of the site and the response activities that have been conducted at the site. Information concerning the FUDS program on Atka Island can be found in the Administrative Record.

An electronic copy of this No Action under CERCLA Proposed Plan will be available during the public comment period at: <https://www.poa.usace.army.mil/Library/Reports-and-Studies/>



Sunrise at Atka

Scope and Role of the Response Action

USACE considers remedial actions for sites that have confirmed unacceptable risk to human health or the environment from historical DoD activities. The RI/RA determined there is no unacceptable risk to human health and the environment at select features. The CERCLA no action for all 293 features at the Atka FUDS programmatically addresses the presence of CERCLA contamination in soil, sediment, groundwater, and/or surface water, but at levels that would pose no unacceptable risk. Remedial action under CERCLA is not necessary because there is no unacceptable risk from CERCLA hazardous substances at the site. Therefore, no Remedial Action Objectives were developed nor were remedial alternatives considered for the 293 features.

SUMMARY OF SITE RISKS

The baseline RA estimates what human health and ecological risks the site poses if no action were to be taken. It also provides a basis for determining whether action is appropriate and identifies the contaminants and exposure pathways that would need to be addressed by remedial action. This discussion of risk only covers the 293 features covered by this No Action Proposed Plan, 284 of which were designated NFA prior to the RA.

The one CERCLA feature at the site that presents an unacceptable risk will be addressed in a separate Proposed Plan. Of the 45 POL features, 34 have the potential for an imminent and substantial endangerment to human health or the environment and will be retained for separate evaluation and potential action under DERP (see Diagram 1).

Human Health Risk – CERCLA Hazardous Substances

Risks have been evaluated using all qualitative and quantitative information gathered to date. This includes evaluating reasonably anticipated current and future exposure pathways, as well as contaminant- and site-specific factors, then estimating the magnitude of cancer and non-cancer risks presented to human receptors by residual contamination. Current and future receptors evaluated in the RI/RA include recreational users and subsistence consumers. Residents, construction workers, and industrial/commercial workers were also evaluated under a future scenario only. Analytical results for surface soil (0 to 2 feet bgs) and, if impacted, combined surface and subsurface soil (0 to 15 feet bgs) were compared to the most stringent of several Federal and State

published risk-based screening levels. Those analytes with concentrations greater than the most stringent screening level were retained as COPCs. A similar screening took place for groundwater, surface water, and/or sediment; no CERCLA COPCs were retained for these media.

Short-term receptors such as recreational users may be exposed to surface soil via dermal contact, inhalation of VOCs and/or fugitive dust, or ingestion. Subsistence consumers could have similar exposures with longer stays in local camps and ingestion of affected biota.

Construction workers have exposure risks to both surface and subsurface soils. Industrial/commercial workers have exposure risks to surface soil. Child and adult residents are considered for both surface and subsurface soil to account for soil mixing and turnover as a result of infrastructure development.

Each feature was considered a unique exposure unit for the calculation of cancer risk (expressed as ILCR) and non-cancer hazard (expressed as individual hazard quotient and cumulative HI). The EPA considers cumulative ILCRs of 1×10^{-6} to 1×10^{-4} to be within the acceptable risk management range and sets a target organ threshold HI of 1.

Features with commingled CERCLA hazardous substances and POL either 1) did not exceed risk-based screening levels and, therefore, were not included in the quantitative RA, or 2) were segregated into risk associated with CERCLA compounds or risk associated with petroleum compounds. Any features with commingled contaminants with potential unacceptable risk driven by petroleum compounds – without the CERCLA hazardous substance-driven HI exceeding 1 – will be addressed as a separate project under the authority of the DERP-FUDS.

All cumulative risk results were within or below the EPA risk management range, and below the non-cancer threshold of 1 for CERCLA hazardous substances.

Ecological Risk

Ecological risk was evaluated for the CERCLA features to assess the impact of site-specific conditions on local flora and fauna. Lead results exceeded ecological screening levels at AAC-TW-003, ARC-GS-004, AIR-UK-001, ICO-TN-014, and UTA-BG-002; however, overall ecological risk evaluations indicated that there were no unacceptable risks to terrestrial plants and/or wildlife from exposure to lead in soil.

Ecological risks were considered acceptable for all features.

BASIS OF NO ACTION

CERCLA Decision. The assessments completed for the 293 features identified no unacceptable ecological or human health risks at the site from CERCLA hazardous substances. Therefore, based on the information currently available, no action is necessary to ensure protection of human health and the environment.

State and community acceptance will be ascertained during the public comment period, during which the state may also provide additional comments. Substantive comments will be summarized, and both state and community concurrence or non-concurrence will be documented as part of the Record of Decision.

COMMUNITY PARTICIPATION

A 45-day public comment period follows submission of this No Action under CERCLA Proposed Plan for public and regulatory review, and a public meeting is planned to discuss the 293 features and path forward introduced in this Proposed Plan.

A written response form is provided at the conclusion of this document.

Public comments can be emailed to:

grant.m.lidren@usace.army.mil

Questions can be directed to the USACE Project Manager Grant Lidren at 907-753-2584 and grant.m.lidren@usace.army.mil.

USACE will provide written responses to all significant comments. A summary of the responses will accompany the subsequent Record of Decision, which will be made available in the Administrative Record.

GLOSSARY

Alaska Department of Environmental Conservation (ADEC) – The regulatory body that monitors the enforcement of Alaska’s environmental regulations.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) – A U.S. federal law designed to clean up sites contaminated with hazardous substances.

Contaminant of Concern (COC) – Chemicals, compounds, or materials that may cause adverse effects on human health or the environment. A contaminant of potential concern becomes a COC if it contributes significantly to unacceptable human health risk at a particular site.

Record of Decision– A public document that explains which alternative or action will be used to clean up a contaminated FUDS site, why it was selected, and how it will be implemented. This document also summarizes all substantive public comments.

Defense Environmental Restoration Program (DERP) – Under this program, the U.S. Department of Defense conducts environmental cleanup at active installations, Formerly Used Defense Sites (FUDS), and Base Realignment and Closure locations. The Army oversees the USACE execution of the FUDS cleanup program.

Hazard Index (HI) – Used for human health risk assessments, the hazard index is generated by adding together the non-cancer risks associated with potential exposure to each chemical at the site representing the potential non-cancer health risk. A hazard index value of 1 or less is considered an acceptable exposure value.

Incremental Lifetime Cancer Risk (ILCR) – Cancer risk is assessed by examining the likelihood of cancer resulting from exposure to contaminants at a site. Cancer risk is expressed as the likelihood of an individual developing cancer over a lifetime as a result of exposure to carcinogens. For example, a 1 in 100,000 risk (usually written as 1×10^{-5}) means for every 100,000 people (receptors) exposed to site contaminants, one extra case of cancer may occur than normally would be expected from all other causes in the area.

No Action – The alternative intended to represent the most likely future expected in the absence of implementing an action alternative. No remedial or removal actions would be performed.

No Further Action (NFA) – A recommendation given to a site prior to site closure indicating that it poses no unacceptable risk.

Petroleum, Oil, and Lubricants (POL) – Fuel-related compounds that are not considered hazardous substances under CERCLA but are regulated by ADEC and included under DERP where they may pose imminent and substantial risk.



ARC-BG-018 Drilling

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**Comments on No Action under CERCLA Proposed Plan for
Atka Air Force Auxiliary Field FUDS, Alaska**

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