



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

610 University Avenue
Fairbanks, AK 99709-3643
Phone: 907-451-2143
Fax: 907-451-2155
www.dec.alaska.gov

DEC File No.: 2512.38.004

September 18, 2024

Barbara Schleiger
Naval Facilities Engineering Command, Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315

Re: Decision Document: No Further Action
Amchitka – Navy, AST C-3, ROTH Naval Facility

Dear Ms. Schleiger:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with aboveground storage tank (AST) C-3 at the Amchitka – Navy site, located at the former Relocatable Over-the-Horizon Radar (ROTHR) Naval Facility at the Former Amchitka Naval Field Station on Amchitka Island. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required unless information becomes available that indicates residual contamination poses an unacceptable risk.

This No Further Action determination is based on the administrative record for the Amchitka – Navy site maintained by ADEC. This decision letter summarizes the site history, cleanup actions, regulatory decisions, and the standard site conditions that apply.

Site Name and Location:

Amchitka – Navy, AST C-3
Base Camp/Airport Area
Amchitka, AK 99546

Name and Mailing Address of Contact Party:

Barbara Schleiger
Naval Facilities Engineering Command, Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315

ADEC Site Identifiers:

File No: 2512.38.004
Hazard ID: 1331
Source Area ID: 81434

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

AST C-3 is located at the Base Camp area south of the Baker Runway on the southern end of Amchitka Island. The AST was a 500-gallon tank that sat in a concrete containment structure and stored diesel fuel. AST C-3 was located next to Building C-3, also known as the Airfield Lightning Vault. The AST and associated piping were removed in 2001. Two samples were collected from surface soils which contained petroleum compounds.

Contaminants of Concern

During the site investigation and cleanup activities at this site, samples were collected from soil and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX), polynuclear aromatic hydrocarbons (PAHs), and diesel range organics (DRO). Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern (COCs) at this site:

- DRO
- Naphthalene

Cleanup Levels

Soil cleanup levels applicable to the site are the most stringent Method 2 cleanup levels for the under 40-inches of precipitation climate zone, established 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	Soil (mg/kg)	Groundwater (µg/L)
DRO	230	1,500
Naphthalene	0.038	1.7

mg/kg = milligrams per kilogram

µg/L = micrograms per liter

Characterization and Cleanup Activities

During the 2001 demolition, two soil samples were collected at 0.5 feet below ground surface (bgs) and analyzed for DRO, BTEX, and naphthalene. DRO was detected on either ends of the tank at 372 and 5,230 mg/kg. Additional sampling occurred in 2016 when three soil samples were collected at 0.5 feet to 1.5 feet bgs and one soil sample was collected from 4 to 5 feet bgs. DRO and naphthalene were found in the deeper sample at 2,200 and 120 mg/kg, respectively. The shallow sample contained DRO at 67 mg/kg, suggesting that the levels had attenuated at the surface.

A groundwater sample was collected in 2016 from a location near the center of the former concrete containment structure at about 9 feet bgs. A surface water sample was also collected from the nearby pond. Both samples were analyzed for DRO and PAHs. DRO was detected in the pond but was below ADEC cleanup levels and Alaska Water Quality Criteria. No contaminants were detected in the groundwater sample.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains onsite 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, ADEC has determined that residual contaminant concentrations meet the cumulative risk criteria for human health.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De-Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 3.

Table 3 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Direct Contact with Surface Soil	De Minimis Exposure	Remaining contamination is below human health and ingestion levels in 18 AAC 75.341, Tables B1 and B2.
Direct Contact with Subsurface Soil	De Minimis Exposure	Contamination remains below 2 feet bgs but is below human health and ingestion levels in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Outdoor Air	De Minimis Exposure	Contamination remains in the subsurface but is below human health and inhalation levels in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	Naphthalene was the only volatile compounds found above soil cleanup levels at 4-5 feet bgs. Buildings are not present at the site and are not likely to be built at the site which is a federal wildlife refuge.
Groundwater Ingestion	Pathway Incomplete	No contamination was found in groundwater.
Surface Water Ingestion	De Minimis Exposure	DRO was found in surface water but did not exceed the 18 AAC 75.345 Table C cleanup levels.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	No Further Evaluation Needed	Surface water contamination did not exceed ecological screening levels. Soil contamination is subsurface and not likely to affect ecological receptors.

Notes:

1. “De-Minimis Exposure” means that, in ADEC’s judgment, the receptors are unlikely to be affected by the minimal volume or concentration of remaining contamination.
2. “Pathway Incomplete” means that, in ADEC’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.

ADEC Decision

At AST C-3, DRO and naphthalene remain in the subsurface but was not found in groundwater. This location will receive a “No Further Action” designation on the Contaminated Sites Database. The Amchitka – Navy site will remain open until all the source areas associated with this site have reached cleanup complete status.

ADEC 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). Please contact ADEC for information about applicable regulations and requirements. A “site”, as defined by 18 AAC 75.990, means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

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.

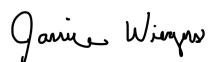
This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if the institutional controls are determined to be ineffective or if information indicates that contaminants at this site may pose an unacceptable risk to human health or 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 ADEC’s “Appeal an ADEC 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 any questions about this closure decision, please contact me at (907) 451-2127, or by email at janice.wiegers@alaska.gov.

Sincerely,



Janice Wiegiers
Project Manager

cc: Tim Plucinski, U.S. Fish and Wildlife Service, timothy_plucinski@fws.gov
Jeff Menkin, LibertyJV, jeffrey.menken@wsp.com

