Project Closure Report

Containerized Hazardous, Toxic, and Radioactive Waste Project #F10AK0606-20

C5 – Base End Station Powerhouse – Building No. 1082 Yakutat Air Base Formerly Used Defense Site Yakutat, Alaska

June 2020



Prepared By:
U.S. Army Corps of Engineers - Alaska
District Environmental Engineering Branch
P.O. Box 6898
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Acronyms and Abbreviations

ADEC Alaska Department of Environmental Conservation

AOC Area of Concern
bgs Below ground surface

CAA Civil Aeronautics Administration

CON/HTRW Containerized Hazardous, Toxic, and Radioactive Waste

DERP Defense Environmental Restoration Program

DoD Department of Defense DRO Diesel Range Organics

FDE Findings and Determination of Eligibility

FUDS Formerly Used Defense Sites

HTRW Hazardous, Toxic, and Radioactive Waste

INPR Inventory Project Report mg/kg Milligrams per kilogram RI Remedial Investigation

USACE United States Army Corps of Engineers

WWII World War II

1. INTRODUCTION

The Authority for the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), 10 U.S.C. § 2701-2707, is the Defense Environmental Restoration Account, 10 U.S.C. § 2703. The DERP-FUDS authorizes the cleanup of contamination resulting from past military activities at sites that were owned by, leased to, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense at the time of the release of contamination, but transferred from DoD's jurisdiction by 17 October 1986. A hazardous, toxic, and radioactive waste (HTRW) project (F10AK0606-02) was authorized for the Yakutat Air Base property (F10AK0606) in 1995 after completing a Findings and Determination of Eligibility (FDE). The results of the FDE indicated that the Yakutat Air Base property met the eligibility requirements for inclusion in the DERP-FUDS program. In 2015 and 2017, revised Inventory Project Reports (INPRs) were completed to delineate the existing -02 HTRW project into multiple containerized hazardous, toxic, and radioactive waste (CON/HTRW) projects (F10AK0606-04 through -20). The CON/HTRW project -20 for the C5 – Base End Station Powerhouse - Building No. 1082, was created during this delineation and authorized in 2017. Alaska Department of Environmental Conservation (ADEC) has included C5 in the "Yakutat AFB Point Carrew Garrison OU". The ADEC File No. is 1530.38.011 and the Hazard ID is 1986.

The CON/HTRW Project F10AK0606-20 has been recommended for site closeout by the United States Army Corps of Engineers, Alaska District (USACE) based on the conclusions of the 2019 removal action report that the site no longer contains contamination at levels posing an imminent and substantial endangerment to human health or the environment. This Project Closeout Report is issued by USACE pursuant to ER 200-3-1, paragraph 4-7.4.1.1.

1.1 SITE LOCATION AND BRIEF DESCRIPTION

Yakutat, Alaska is approximately 225 miles northwest of Juneau and 380 miles southeast of Anchorage, Alaska at 59° 33' N Latitude, 139° 44' W Longitude (Section 30, Township 27 South, Range 34 East, Copper River Meridian). Located at the mouth of Yakutat Bay, the community is bounded by the Wrangell-Saint Elias Mountains and Yakutat Bay to the north, the Tongass National Forest to the south and east, and the Gulf of Alaska to the west (Figure 1). The FUDS sites, scattered around the Yakutat Air Base, are not connected via road to other permanent Southeast Alaska communities, and are only accessible by air or water.

1.2 YAKUTAT AIR BASE HISTORY

U.S. military interest in Yakutat began by Executive Order in 1929 with the creation of the Yakutat Bay Naval Reservation. As early as 1936, the War Department was considering Yakutat as a site for a military airfield. Soon after World War II (WWII) began in Europe (September 1939) the Civil Aeronautics Administration (CAA) embarked on a program of building and improving airfields in Alaska with both commercial and tactical values in mind. The first government use of the area was a CAA radio range commissioned in June 1940 on a site near Yakutat village. The War Department acquired 46,083 acres from the Department of the Interior (U.S. Forest Service), Department of the

Navy, and the Department of Commerce (Lighthouse Reserves) for the establishment of an "Auxiliary Landing Field and Staging Area". In October 1940, Army Engineer troops arrived to begin construction of the Yakutat Landing Field (also known as the Yakutat Air Base). Constructed by military engineers and members of the Civilian Conservation Corps, the landing field was completed on June 15, 1943.

The Yakutat Air Base was intended as an advanced airfield supporting pursuit and bombardment aircraft against Japanese invasion forces. However, as western Aleutian bases expanded and the Japanese were stopped on Attu and Kiska, its military value diminished significantly and no aircraft were permanently assigned. Instead, the base served as a ferrying post and temporary station for aircraft squadrons and as a refueling stop between the 48 contiguous states and points in Alaska.

In December 1943, after the Japanese were expelled from the Aleutians, military activities were gradually reduced with personnel and equipment being transferred elsewhere. In April of 1944, the Yakutat Air Base was placed in caretaker status until the end of the war. A similar reduction took place at the seaplane base, which was officially closed on July 22, 1944.

The Yakutat Air Base was declared surplus by the Army in December 1945 and ceased operations in 1946. On December 1, 1945, the CAA assumed responsibility for maintenance and operation of the airfield, leading to the transfer of the airfield and its associated facilities from the Army to CAA on April 4, 1947. The improvements, equipment, and materials that were not transferred to the CAA were declared excess by the War Department to the War Assets Administration for disposal in June 1948, pursuant to the Surplus Property Act of 1944.

Beginning in 1946, ownership of the air base property was relinquished and retransferred to the original owners: Department of the Interior, Bureau of Land Management (Tract B containing 42,437 acres - in two portions: July 1946 and March 1947), the Department of Commerce (Tract C, 147 acres – November 1948), and the Department of the Navy (Tract A, 3,500 acres – March 1949). When the Yakutat Bay Naval Reservation was revoked in 1953, 266 acres were withdrawn for the use of the CAA, known as the Air-Navigation Site Withdrawal, and the remaining acreage was returned to the Tongass National Forest.

1.3 AREA OF CONCERN C5 HISTORY

A small Coast Artillery outpost, comprised of a base end station and harbor entrance control point (HECP), operated at Ocean Cape briefly during World War II. Constructed in 1942 by the 244th Coast Artillery Corps as part of the harbor defense installations at Point Carrew, base end stations were positioned at Ocean Cape and Khantaak Island to cover the entrance to Yakutat Bay. The radar installation was started in February 1943 and completed by September. By mid-summer 1943, tactical operations were reduced because Alaska action had shifted so far to the west that the possibility of enemy attack had dwindled. In September 1943, the Coast Artillery garrison troops were transferred westward with the exception of a small detachment left to operate the radar installation. That personnel transfer permitted the closing down of the Point Carrew garrison area with the exception of the Ocean Cape outpost. The radar installation was in operation for about three months before it was disassembled and shipped to another station.

C5 is located on the west side of Point Carrew Road, approximately 1.7 miles west of the Ankau Trestle Bridge. The 1948 War Assets Administration Real Property Classification inventory described Building 1082 as a 14' x 16' Frame Powerhouse. It was one of 15 structures at Ocean Cape depicted on the *Yakutat Landing Field Layout Plan, Sheet No. 11*, Revised 3/5/46 (Figure 2). Asbuilts from the 1984 USACE removal action show that adjacent buildings were removed and may have included the powerhouse structure.

Previous references to the C5 site identified the structure as "Building No. 1092" as depicted on the 1943 *Yakutat Landing Field, Utilities & Building Numbers, Harbor Battery Area* drawing. A 1946 revision of that drawing to "update the status of buildings" correctly identified this powerhouse as Building No. 1082.

A 2016 remedial investigation (RI) conducted at the Ocean Cape Radio Relay Site FUDS (F10AK0747) included the location of the former WWII Base End Station Powerhouse (building 1082) where a concrete foundation was uncovered.

1.4 REMEDIAL HISTORY

In 2016 USACE conducted an RI at the C5 site. A geophysical survey was performed locating the foundation of Building 1082. Soil samples collected adjacent to the foundation indicated elevated levels of Diesel Range Organics (DRO), chloroform, and naphthalene above ADEC cleanup levels at depths of 6-8 feet below ground surface (bgs). DRO, chloroform, and naphthalene exceedances were 1,600 mg/kg, 0.063mg/kg, and 0.064 mg/kg respectively. Chloroform was found in the near surface soil exceeding ADEC cleanup levels but this was attributed to natural microorganism activity. The area of contamination was estimated to be 20' x 20' and appeared to extend from the surface vertically to the saturated zone, approximately 8.5 feet bgs (2017b).

Based on the field screening and geophysical investigation, three monitoring wells were installed and sampled. One monitoring well (92-MW011) was installed to the southwest of the former powerhouse location near geophysical anomalies. The groundwater sample was submitted for full suite analysis. Two monitoring wells were installed near the soil boring with the highest Photo Ionization Detector (PID) reading (82-MW012) and downgradient of this elevated field screening area.

Arsenic and chromium exceed the ADEC Table C cleanup levels in groundwater; however, there are no known anthropogenic arsenic and chromium sources at this site and it is suspected that the elevated concentrations are naturally occurring. The one groundwater sample containing cadmium at concentrations greater than the ecological screening level was qualified as QN, indicating it is considered an estimated value biased high/low/uncertain due to a QC failure. In addition, cadmium was not identified in the duplicate groundwater sample or as a soil chemical of concern. Barium was also detected above the ecological screening level; however, barium in groundwater tends to precipitate as barium sulfate upon discharge to saline waters with only an estimated 0.006% of the total barium brought by freshwater sources remaining in solution (WHO 2001). Because of its low solubility, barium sulfate tends to be nontoxic and this finding is not considered significant.

In 2018, a Removal Action was conducted at the site and 893 tons of petroleum contaminated soil was excavated (Figure 3). Soil and groundwater samples were submitted to the project laboratory for DRO, chloroform, and naphthalene analysis. All the analytical confirmation soil sample results were below ADEC cleanup levels.

With the completion of the excavation, groundwater monitoring wells were installed in the former source area and down gradient of the excavation. The wells were developed, purged and sampled and all the groundwater analytical results indicate that the remaining dissolved phase contamination is below ADEC cleanup levels.

The human health and ecological Conceptual Site Models and an Ecoscoping form were updated and show no remaining human health or ecological risk (2019).

Accordingly, no further DoD action is warranted at the C5 – Base End Station Powerhouse - No. 1082 site.

2. SUMMARY OF DECISION

Based on the results of the 2018 Removal Action, USACE has determined that no further DoD action is required at the C5 – Base End Powerhouse (F10AK0606-20), and project closeout is protective of public health, welfare, and the environment.

This decision may be reviewed and modified in the future if any new information becomes available indicating the presence of eligible CON/HTRW that may cause an unacceptable risk, or pose an imminent and substantial endangerment, to human health or the environment.

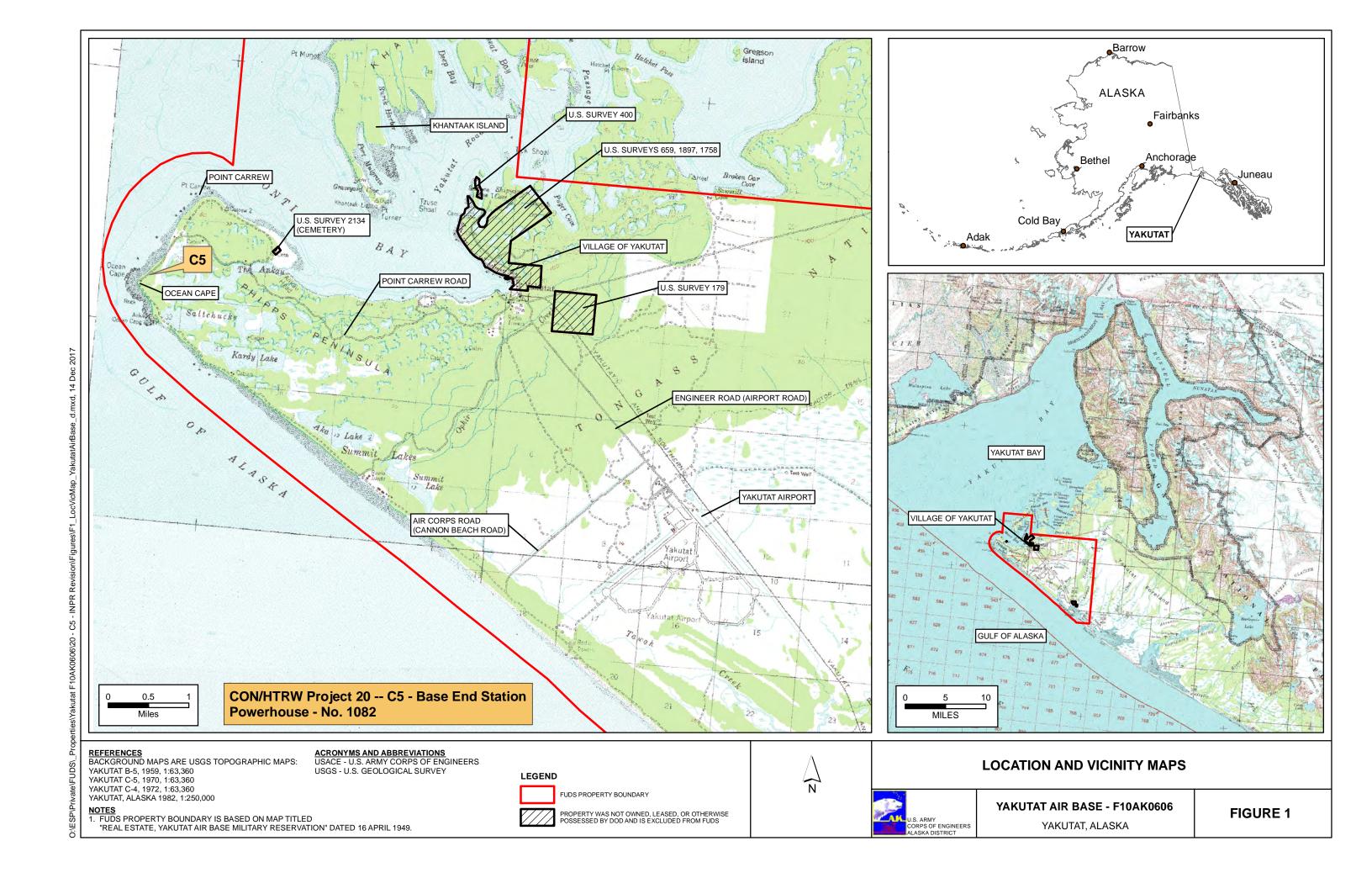
3. REFERENCES

- 18 AAC 75. 2018. Alaska Administrative Code, Title 18, Chapter 75. Oil and Other Hazardous Substances Pollution Control. October.
- U.S. Army Corps of Engineers (USACE). 1942. Yakutat Army Air Base, Plot Plan Harbor Battery, Dec 10, 1942, N-59A-42, YAK FO/82, Y-64. F10AK0606--_01.04_0502_a.
- ----. 1943. Yakutat Landing Field Alaska, Utilities & Building Numbers, Harbor Battery Area, Sheet No. 1 of 2, February 25, 1943, Revised July 8, 1943, File No. N-59A-15, YAK FO/93. F10AK0606--_01.04_0533_a.
- ----. 1945. Yakutat Landing Field Alaska, Layout Plan, Sheet No. 11 of 11, 2nd revision January 22, 1945, Supersedes Dwg. Dated Feb.15, 1943, File No. N-59-36, 15-04-288. F10AK0606--_01.04_0519_a.
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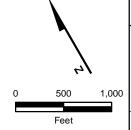
- ----. 1995. Defense Environmental Restoration Program Formerly Used Defense Sites (DERP-FUDS) Inventory Project Report for Property No. F10AK0606. Yakutat Air Base, Yakutat, AK. September. F10AK0606--_01.08_0500_a.
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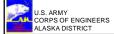
FIGURES

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Background map is titled Layout Plan, Yakutat Landing Field Alaska, Sheet No. 11, File No. N-59-361, 1943, last revision 3 March 1946.



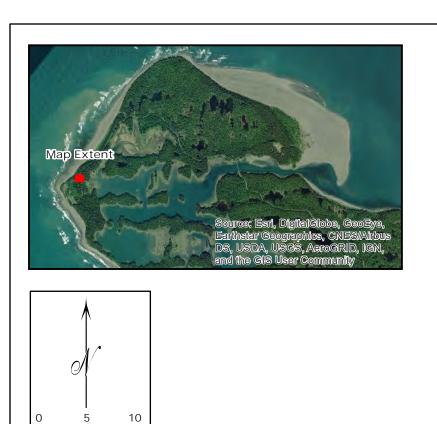


WWII Base End Station 1946 Yakutat Landing Field Layout Revision

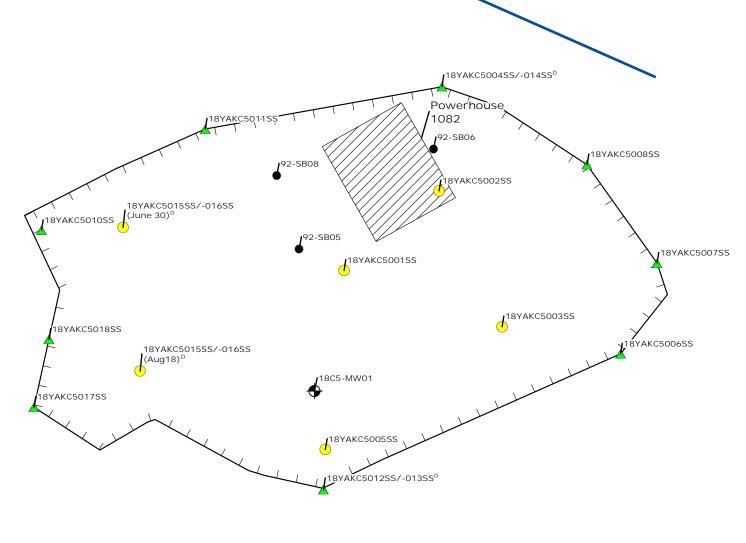
Yakutat Air Base Formerly Used Defense Site -- F10AK0606 Yakutat, Alaska

Date: 12/14/2017

Figure 2



18C5-MW02



Sample ID 18YAKC5015SS/-016SS was used twice in two different locations. The location of each sample is indicated in the ID with the date it was taken.

Legend

2016 Soil Boring (Exceedance)

2018 Sidewall Sample Location

2018 Floor Sample Location 2018 Monitoring Well Sample Location Location of Former Structure

Excavation

Approximate Groundwater Flow Direction

FIGURE 3

C5 - Base End Station Powerhouse No. 1082 Removal Map Yakutat Air Base FUDS Yakutat, Alaska





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Point Carrew Road



Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE Contaminated Sites Program

555 Cordova Street Anchorage, AK 99501 Main: 907-269-0298 Fax: 907-269-7687 www.dec.alaska.gov

File: 1530.38.011

May 26, 2020

Christy Baez U.S. Army Corps of Engineers P.O. Box 6898 Elmendorf AFB, AK 99506-6898

Re: "Declaration of Project Closeout Decision for Yakutat Air Base Formerly Used Defense Site CON/HTRW Project F10AK0606-20 C5 – Base End Station Powerhouse – Building No. 1082 Yakutat, Alaska" dated April 2020

Dear Ms. Baez:

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program received a copy of the above referenced document on April 08, 2020. The ADEC Contaminated Sites Program agrees that this project closure is consistent with state investigation and cleanup requirements listed in 18 AAC 75. This decision may be reviewed and modified in the future if information becomes available that indicates an unacceptable risk to human health or the environment associated with the project. Please note that this is a project closure decision and not a site closure decision. Remaining contaminant sources and contaminant releases to the environment will need to be addressed in future projects at Yakutat Air Base. Please submit the final signed closeout report.

If you have questions about this closure decision, please contact Rachael Petraeus at (907) 269-7520 or email at rachael.petraeus@alaska.gov.

Sincerely,

Rachael Petraeus Project Manager

Dachaulletracus

cc: Melinda Brunner, ADEC

DECLARATION OF PROJECT CLOSEOUT DECISION

CON/HTRW Project F10AK0606-20

C5 – Base End Station Powerhouse – Building No. 1082 Yakutat Air Base Formerly Used Defense Site Yakutat, Alaska

STATEMENT OF BASIS

The Authority for the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), 10 U.S.C. § 2701-2707, is the Defense Environmental Restoration Account, 10 U.S.C. § 2703. The DERP-FUDS authorizes the cleanup of contamination resulting from past military activities at sites that were owned by, leased to, or otherwise possessed by the United States and under the jurisdiction of the Secretary of Defense at the time of the release of contamination, but transferred from DoD's jurisdiction by 17 October 1986. A hazardous, toxic, and radioactive waste (HTRW) project (F10AK0606-02) was authorized for the Yakutat Air Base property (F10AK0606) in 1995 after completing a Findings and Determination of Eligibility (FDE). The results of the FDE indicated that the Yakutat Air Base property met the eligibility requirements for inclusion in the DERP-FUDS program. In 2015 and 2017, revised Inventory Project Reports (INPRs) were completed to delineate the existing -02 HTRW project into multiple containerized hazardous, toxic, and radioactive waste (CON/HTRW) projects (F10AK0606-04 through -20). The CON/HTRW project -20 for the C5 – Base End Station Powerhouse - Building No. 1082, was created during this delineation and authorized in 2017.

Based on the conclusions of the 2019 Removal Action (RA) report, that the site no longer contains contamination at levels posing an imminent and substantial endangerment to human health or the environment, the United States Corps of Engineers, Alaska District (USACE) has determined that no further action is required at the C5 – Base End Station Powerhouse – Building No. 1082, F10AK0606-20. This Project Closeout Report is issued by USACE pursuant to ER 200-3-1, paragraph 4-7.4.1.1.

SITE DESCRIPTION AND HISTORY

Yakutat is located approximately 225 miles northwest of Juneau and 380 miles southeast of Anchorage, Alaska. C5 is located on the west side of Point Carrew Road, approximately 1.7 miles west of the Ankau Trestle Bridge. The approximate site location is 59.54357 degrees North Latitude, -139.8586 degrees West Longitude; Lot 7, Section 29, Township 27 South, Range 33 East, Copper River Meridian, on land owned by Yak-Tat Kwaan.

The 1948 War Assets Administration Real Property Classification inventory described Building 1082 as a 14' x 16' Frame Powerhouse. It was one of 15 structures at Ocean Cape depicted on the Yakutat Landing Field Layout Plan, Sheet No. 11, Revised 3/5/46 (Figure 2). Asbuilts from the 1984 USACE removal action show that adjacent buildings were removed and may have included the powerhouse structure.

In 2016 USACE conducted a Remedial Investigation at the C5 site. A geophysical survey was performed locating the foundation of Building 1082. Soil samples collected adjacent to the foundation indicated elevated levels of Diesel Range Organics (DRO), chloroform, and

naphthalene above Alaska Department of Environmental Conservation (ADEC) cleanup levels at depths of 6-8 feet below ground surface (bgs). DRO, chloroform, and naphthalene exceedances were 1,600 mg/kg, 0.063 mg/kg, and 0.064 mg/kg respectively. Chloroform was found in the near surface soil exceeding ADEC cleanup levels but this was attributed to natural microorganism activity. The area of contamination was estimated to be 20' x 20' and appeared to extend from the surface vertically to the saturated zone, approximately 8.5 feet bgs (2017b).

Based on the field screening and geophysical investigation, three monitoring wells were installed and sampled. One monitoring well (92-MW011) was installed to the southwest of the former powerhouse location near geophysical anomalies. The groundwater sample was submitted for full suite analysis. Two monitoring wells were installed near the soil boring with the highest Photo Ionization Detector (PID) reading (82-MW012) and down gradient of this elevated field screening area.

Arsenic and chromium exceed the ADEC Table C cleanup levels in groundwater; however, there are no known anthropogenic arsenic and chromium sources at this site and it is suspected that the elevated concentrations are naturally occurring. The one groundwater sample containing cadmium at concentrations greater than the ecological screening level was qualified as QN, indicating it is considered an estimated value biased high/low/uncertain due to a QC failure. In addition, cadmium was not identified in the duplicate groundwater sample or as a soil chemical of concern. Barium was also detected above the ecological screening level; however, barium in groundwater tends to precipitate as barium sulfate upon discharge to saline waters with only an estimated 0.006% of the total barium brought by freshwater sources remaining in solution (WHO 2001). Because of its low solubility, barium sulfate tends to be nontoxic and this finding is not considered significant.

In 2018, a Removal Action was conducted at the site and 893 tons of petroleum contaminated soil was excavated (Figure 3). Soil and groundwater samples were submitted to the project laboratory for DRO, chloroform, and naphthalene analysis. All the analytical confirmation soil sample results were below ADEC cleanup levels.

With the completion of the excavation, groundwater monitoring wells were installed in the former source area and down gradient of the excavation. The wells were developed, purged and sampled and all the groundwater analytical results indicate that the remaining dissolved phase contamination is below ADEC cleanup levels.

The human health and ecological Conceptual Site Models and an Ecoscoping form were updated and show no remaining human health or ecological risk (2019).

Accordingly, no further DoD action is warranted at the C5 – Base End Station Powerhouse - No. 1082 site.

DESCRIPTION OF THE DECISION

Based on the conclusions in the 2019 Removal Action Report, that the site did not contain contamination at levels posing an imminent and substantial endangerment to human health or the environment, USACE has determined that no further action is required at the C5 – Base End Station Powerhouse, Yakutat Air Base, F10AK0606-20. The ADEC reviewed the report of the

2018 RA, which was finalized in 2019, and concurred with the report's conclusions and recommendations. USACE received ADEC concurrence with this project closeout decision on 26 May 2020.

DECLARATION

In accordance with the Defense Environmental Restoration Program for Formerly Used Defense Sites, the U.S. Army Engineer District, Alaska, has completed all CON/HTRW activities associated with the C5 – Base End Station Powerhouse, F10AK0606-20 in Yakutat, Alaska. This Declaration of Project Closeout Decision supports the conclusion that no sources of CON/HTRW are present at levels that pose an imminent and substantial endangerment to human health or the environment. This decision may be reviewed and modified in the future if any new information becomes available which indicates the presence of eligible CON/HTRW that may pose an unacceptable risk, or an imminent and substantial endangerment, to human health or the environment.

This Declaration of Project Closeout Decision has been prepared and approved by the undersigned in accordance with the FUDS Program Policy, Engineer Regulation 200-3-1, May 10, 2004.

Date June 10, 2020

DAVID R. HIBNER

COL, EN Commanding

U.S. ARMY CORPS OF ENGINEERS, ALASKA DISTRICT POA STAFF ACTION SUMMARY For use of this form, see AR 25-50 and DA Memo 25-52; the proponent agency is CEPOA-DE.								OL NUMBER	2. SUSPENSE DATE (YYYYMMDE 20200605	
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	INSTRUCTIONS DIPPOSE / ROTTOM LINE / DISCUSSION AND RESOURCE IMPACT								

- 1. PURPOSE: STATE THE PURPOSE OF THE STAFF ACTION SUMMARY (SAS). IF PREPARING A DECISION SAS, STATE WHAT THE RECOMMENDED DECISION WILL ACHIEVE. IF PREPARING AN INFORMATION SAS, STATE THE PURPOSE OF THE INFORMATION. THE SAS WILL NOT EXCEED ONE PAGE. IF THE PURPOSE OF THE SAS IS TO RESPOND TO A COMMAND GROUP TASKER, REFER TO THE TASKER AS A BACKGROUND TAB.
- 2. BOTTOM LINE: STATE THE "BOTTOM LINE" IN THIS PARAGRAPH. BRIEFLY STATE THE ACTION REQUIRED, OR SUMMARIZE THE INFORMATION
 THAT WILL BE DISCUSSED IN PARAGRAPH 3.
- 3. DISCUSSION: DECISION AND INFORMATION SAS'S REQUIRE FOUR MAJOR PARAGRAPHS (purpose, bottom line, discussion and resource impact).
 THE DISCUSSION WILL BE AS BRIEF AS POSSIBLE AND WILL NOT BE CONTINUED ON ADDITIONAL PAGES. THE DISCUSSION BLOCK IS USED TO
 TELL THE COMMAND GROUP ONLY WHAT THEY NEED TO KNOW. IF SUBPARAGRAPHS ARE NEEDED, USE BULLETS. (Bullets are in the Insert
 Symbol application in Word.)
 - SUBPARAGRAPHS SHOULD BE SHORT AND TO THE POINT. COMMENTS, IF ANY, SHOULD PROVIDE FACTS THAT RELATE DIRECTLY TO THE ACTION
 - IF THE RECOMMENDED DECISION OR THE INFORMATION IS BEING FORWARDED BECAUSE OF A REQUIREMENT IN ANOTHER DOCUMENT, THAT DOCUMENT WILL BE ATTACHED TO THE SAS AS BACKGROUND INFORMATION UNDER A BACKGROUND TAB.
 - IF THE RECOMMENDED DECISION REQUIRES APPROVAL OR SIGNATURE OF A DOCUMENT, THAT DOCUMENT WILL BE INSERTED (not stapled) UNDER A SIGNATURE TAB.
 - IF THE DECISION REQUIRES SUPPORTING DOCUMENTATION, THAT INFORMATION WILL BE ATTACHED AS A COORDINATION TAB. IF THE COORDINATION DOCUMENT IS LONGER THAN 10 PAGES, A SUMMARY OF THE DOCUMENT'S KEY POINTS WILL BE ADDED AS THE FIRST PAGE OF THE COORDINATION DOCUMENT.
- 4. RESOURCE IMPACT: STATE THE PROJECT FINANCIAL (monetary or work hours) IMPACT THIS ACTION WILL HAVE ON USACE, HOW IT WILL BE FUNDED, AND IF IT WAS PLANNED OR NOT.
- 5. ROUTING: ROUTING FOR THE COMMANDER WILL BE DONE THROUGH THE DIVISION CHIEF, STAFF SUBJECT MATTER EXPERT(s), HORIZONTAL DIVISION CHIEF(s) THE DECISION WILL AFFECT, DEPUTY DISTRICT COMMANDER, AND THEN THE COMMANDER. COMMENTS PROVIDED DURING ROUTING WILL BE PROVIDED IN THIS BLOCK OR THE FRONT OF THE FOLDER, AFTER THIS STAFF ACTION SUMMARY.
- 6. CONTROL NUMBER: ROUTING NUMBER IS COMPOSED OF 3 ELEMENTS: THE TWO-LETTER OFFICE SYMBOL FOLLOWED BY A DASH, THE TWO
 DIGIT YEAR FOLLOWED BY A DASH, AND THE DOCUMENT'S CHRONOLOGICAL NUMBER.