

**TECHNICAL DOCUMENT TO SUPPORT
INSTALLATION RESTORATION DECISION****PART I****DECLARATION****SITE NAME AND LOCATION**

Installation Restoration Program Site SS007, at Galena Airport, Alaska: SS007 includes the dike and adjacent woodlands, and the floodplain of the Yukon River downstream from Galena, to the downstream end of Megotsol Island.

STATEMENT OF BASIS

This decision is based on information contained in the Remedial Investigation Report (Galena Airport and Campion Air Station, March 1996), the Drum Survey Report (Final, Galena Airport, Alaska, June 1998), the Drum Removal Actions Report (Final, Galena Airport, Alaska, December 2000), and the Final Remedial Investigation Report, Drum Investigation for Drums Down River from Galena Airport, Galena Alaska (February 2001).

This Decision Document (DD) presents the selected remedial action for SS007. This DD has been developed in accordance with the Defense Environmental Restoration Program, 10 *United States Code* (USC) 2701, consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC 9601 and Executive Order 12580 (52 *Federal Register* 2923), and to the extent practicable with the National Oil and Hazardous Substances Pollution Contingency Plan (40 *Code of Federal Regulations* 300).

PREVIOUS SITE ACTIVITIES

Reports of studies/investigations were completed in 1996, 1998, and 2000. Interim cleanup actions are summarized in the table below.

Date	Location	Drums Recovered	Products Recovered
Interim Action, 1993 & 1994	Adjacent to Galena Airport, within 1 mile	38,000	462 drums of tar; 21 drums of used oil; 3 drums of antifreeze
Interim Action, 1999	Within 10 mile radius	12,900	633 tons of tar, recycled; 200 drums of tar landfilled off-site; 2 drums of hazardous liquid

ASSESSMENT OF THE SITE

Numerous soil samples have been collected from the dike area and analyzed. Contaminant levels in soil from around the dike were below cleanup levels in 18AAC75, Method Two, Table B1, for the Under 40-inch zone. Therefore, no action is anticipated at the dike. In 2000, an investigation was conducted to locate Air Force drums in the floodplain of the Yukon River from Galena to the downstream end of Megotsol Island, downstream from Koyukuk, approximately 40 miles from Galena. Maps depicting drum locations are in the *Final Remedial Investigation Report, Drum Investigation for Drums Down River from Galena Airport, Galena Alaska, February, 2001*. Approximately 700 drums were identified. Field inspections showed that more than 80% of the drums are empty. One drum had released less than 8 ounces of tar to the ground surface. Laboratory analysis of tar that had been recovered in 1999 has

indicated the tar is not hazardous. Drums with contents appeared to have water or sediment. No soil contamination due to release of drum contents was observed. However, no sampling or analysis was performed during the 2000 investigation. Based upon previous drum removal efforts, it is likely that small quantities of hazardous substances exist in the unrecovered drums.

DESCRIPTION OF THE SELECTED REMEDY

Under this remedy, the Air Force would remove all drums, associated with Air Force activities at Galena Airport, located to the north, west, and down river in the floodplain of the Yukon River downstream from Galena, to the downstream end of Megotsol Island. This remedy will include collection and disposal of the drums, collection and disposal of any hazardous material in the drums, and removal and disposal of any soil contaminated by hazardous material that has leaked from the drums. Drums that are visible will be removed. No excavation to discover drums will be performed. Once the work is completed, no further action is anticipated at this site.

Based upon investigations conducted at IRP Site SS007 to date, there is presently no confirmed unacceptable risk or threat to public health or the environment, due to existing soil or groundwater contamination. However, there is an unacceptable risk of future releases of drum contents. Removal of drums is selected because it safely and efficiently removes potential sources of contamination from the site. Therefore, drum removal under the CERCLA is selected as the remedy for IRP Site SS007. The State of Alaska supports and concurs with the selected remedy.

DECLARATION AND STATUTORY DETERMINATIONS

The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate, and is cost-effective. Recycling materials where possible will satisfy the statutory preference for treatment.

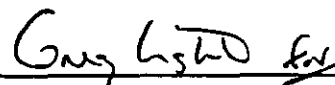
This decision may be reviewed and modified in the future if new information becomes available which indicates the presence of previously undiscovered contamination or exposure routes that may cause a risk to human health or the environment.



MICHAEL M. WYKA, Colonel, USAF
Commander, 611th Air Support Group
United States Air Force

20 MAR 01

Date



Jennifer Roberts
Contaminated Sites Section Manager
Alaska Department of Environmental Conservation

3/8/01

Date

PART II
DECISION SUMMARY
for
IRP Site SS-007
(Drums)
at
GALENA AIRPORT, ALASKA
FEBRUARY 2001

This Decision Summary provides an overview of the decision to perform drum removal at SS007, near Galena Airport, Alaska. This Decision Document presents the physical features of the site, the contaminants present, and a description of previous activities. It also describes the rationale for performing drum removal and describes activities that meet requirements of the Defense Environmental Restoration Program, 10 *United States Code (USC) 2701*, consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC 9601, Executive Order 12580, and the National Oil and Hazardous Substances Pollution Contingency Plan.

The U.S. Air Force (USAF) completed a Remedial Investigation (RI) in 1996, to provide information regarding the nature and extent of contamination in the soils at the dike in SS007. A drum survey report was completed in 1998, to locate drums in woodlands adjacent to Galena Airport. An investigation for drums down river from Galena was completed in 2000.

Removal of drums was performed in adjacent woodlands in 1993, 1994, and 1999. However, drums remain in the floodplain of the Yukon River down river from Galena. There is potential that hazardous substances may exist in those drums, and that hazardous substances may be released from the drums. Therefore, there is need for remedial action under the CERCLA. Complete details regarding the remedial investigation and results are included in the *Galena Airport and Campion Air Station Remedial Investigation Report* (March 1996), *Drum Survey Report* (June 1998), and the *Final Remedial Investigation Report, Drum Investigation for Drums Down River from Galena Airport, Galena Alaska* (February 2001).

1.0 SITE NAME, LOCATION, AND DESCRIPTION

Galena is located along the north bank of the Yukon River, approximately 270 miles west of Fairbanks. The Air Force installation, formerly known as Galena Air Force Station, was constructed during World War II. It was deactivated in 1993. It is currently being operated and maintained by contractors on behalf of the Air Force.

The perimeter dike surrounds the entire Galena Airport facility and ranges in height from just above ground level to about 20 feet above grade. A frequently used road runs along the top of the entire dike, and most sides of the dike are thickly vegetated, predominantly with small willows. The perimeter dike was constructed in the 1940s to protect the Galena Airport from annual flooding of the Yukon River. SS007 includes the dike and adjacent woodlands, and the floodplain of the Yukon River downstream from Galena, to the downstream end of Megotsol Island, approximately 40 miles down river from Galena.

2.0 HISTORY OF SS007

Repeated floods have washed drums downstream into the river and surrounding woods. Investigations and surveys, Interim Remedial Actions, and Community Relations for SS007 are summarized in the following sections.

2.1 INVESTIGATIONS AND SURVEYS

The dike is reportedly constructed of used 55-gallon drums that were crushed or filled with sand. There was no evidence found to confirm this during a literature search and visual inspection. Fifty-seven soil gas samples were collected from the dike road and analyzed. Soil samples were collected from the 10 locations where soil gas analysis indicated the highest concentration of contaminants (RI, March 1996). Contaminant levels in soil from around the dike were below cleanup levels in the Alaska Department of Environment Conservation regulations (18 AAC 75), Method Two, Table B1, for the Under 40-inch zone. Therefore no action is anticipated at the dike.

The 1998 Drum Survey Report documented drums found in adjacent woodlands in 1996 and 1997. Those drums were removed in 1999. Drum removal activities are documented in the *Galena Airport, Alaska, Drum Removal Actions Report, Final, December 2000*.

During the investigation conducted in 2000, approximately 700 drums were identified and their locations were recorded. Field inspections showed that more than 80% of the drums are empty. One drum had released less than 8 ounces of tar to the ground surface. Laboratory analysis of tar that had been recovered in 1999 has indicated the tar is not hazardous. Drums with contents appeared to have water or sediment. No soil contamination due to release of drum contents was observed. However, no sampling or analysis was performed during the 2000 investigation. The results of the investigation conducted in 2000 are documented in the Final Remedial Investigation Report, Drum Investigation for Drums Down River from Galena Airport, Galena Alaska (February 2001).

2.2 INTERIM CLEANUP ACTIONS

The Air Force has conducted numerous studies and investigations, and interim cleanup actions. Cleanup activities were performed in 1993, 1994, and 1999.

Approximately 38,000 drums were removed from nearby woods in 1993 and 1994. Empty drums were inspected, cleaned, and shipped to a recycler. Tar from 462 drums was put in a landfill in Washington State. Used oil from 21 drums was used for energy recovery. Antifreeze from 3 drums was recycled.

A survey for drums, in adjacent woodlands, was conducted in 1996 and 1997, and the survey report was final in 1998. This survey was used to develop the work plan for removal of drums in 1999.

Approximately 12,700 drums were removed from adjacent woodlands in 1999. Empty drums were either recycled or disposed in the landfill operated by the City of Galena. Used oil and fuel were recovered, consolidated into 26 drums, and used for energy recovery. Approximately 633 tons of tar, and tar contaminated with soil, was used for energy recovery. Additionally, 200 drums of tar were disposed in a permitted landfill in Oregon. The tar was manufactured for paving projects. Two drums of liquid were characterized as hazardous (benzene and lead), then treated and disposed at a permitted facility.

In 2000, approximately 700 drums were found during an investigation described in section 2.1 above. Based upon previous drum removal efforts, it is likely that small quantities of hazardous substances exist in the unrecovered drums.

2.3 SELECTED REMEDY

The Air Force will remove all drums, associated with Air Force activities at Galena Airport, located to the north, west, and down river in the floodplain of the Yukon River downstream from Galena, to the downstream end of Megotsol Island. This will include collection and disposal of the drums, collection and disposal of any hazardous material in the drums, and removal and disposal of any soil contaminated by hazardous material that has leaked from the drums. Drums that are visible will be removed. If contaminated soil is encountered, cleanup standards to be used will be those published in Alaska Department of Environment Conservation regulations (18 AAC 75), Method Two, for sites that receive less than 40 inches of rainfall annually, migration to groundwater levels. No excavation to discover drums will be performed. Once the work is completed, no further action is anticipated at this site.

The State of Alaska supports and concurs with the selected remedy of drum removal.

This decision may be reviewed and modified in the future if new information becomes available which indicates the presence of previously undiscovered contamination or exposure routes that may cause a risk to human health or the environment.

2.4 COMMUNITY RELATIONS HISTORY

The Air Force has been conducting Restoration Advisory Board (RAB) meetings in Galena since 1995. The RAB is comprised of community members, the Air Force and the ADEC. The RAB has facilitated communication and coordination, among the community members, the ADEC, and the United States Air Force (USAF), in relation to the Installation Restoration Program (IRP). The RAB reflects the diverse interests of the community. The RAB has provided opportunities for all members of the community to identify environmental restoration concerns, observe progress, comment on environmental restoration priorities, and advise on environmental restoration strategies. In 1997, the RAB community members identified cleanup of drums as one of its priorities.

For easy public access, the Air Force maintains a repository of documents about investigations and cleanup, at the Charles Evans Community Library, inside Galena High School.

Numerous public meetings have been conducted to discuss drum cleanup and investigations and seek input from community members. Fact sheets were distributed to community members. Flyers have been posted in prominent locations throughout Galena, in an effort to inform community members of scheduled meetings. All meeting dates and times have been coordinated with City and Tribal government staff, and prominent citizens of Galena, in an effort to ensure that meetings do not conflict with other community activities. Copies of applicable documents have been provided at the

meetings for the public to review. Radio has been used to inform the public about meetings, cleanup activities, availability of documents, and how the public may provide input to the cleanup activities and the RAB.

The Proposed Plan for Cleanup was distributed for public review and comment in January 2001. Responses to all comments received on the Proposed Plan are presented in the Responsiveness Summary provided in Part III.

PART III
RESPONSIVENESS SUMMARY

OVERVIEW

The Proposed Plan for Cleanup was made available for public review and comment. The Proposed Plan described the results of the previous investigations, cleanup actions conducted, alternatives evaluated to address the drums, and the preferred alternative. The public comment period was from January 12 to February 11, 2001. Comments were received and are summarized in this Responsiveness Summary.

BACKGROUND OF COMMUNITY INVOLVEMENT

In accordance with 40 CFR 300.430, a notice of availability, of the Proposed Plan, was published in a major local newspaper of general circulation. A public meeting was held in Galena on January 16, 2001, to summarize the investigations and cleanup activities at SS007, and seek public comments on the alternatives evaluated in the Proposed Plan. Copies of the Proposed Plan were distributed at the public meeting. In addition, copies of other applicable documents were available for the public to review. The public was encouraged to call the Project Managers in the Air Force and the ADEC with all comments and questions. The location of the Information Repository was mentioned. Two radio interviews were conducted during the public comment period to remind the public about the availability of the Proposed Plan, seek public comments, and invite participation in the Restoration Advisory Board. The public was invited to provide written or verbal comments on the Proposed Plan. A toll-free telephone number was provided so the public could contact the Air Force without incurring charges. The telephone numbers of the Air Force Project Manager and the ADEC Project Manager were provided. Additional copies of the Proposed Plan were placed in prominent locations in Galena.

The Air Force received numerous verbal comments and one written comment on the Proposed Plan.

SUMMARY OF COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD AND U.S. AIR FORCE RESPONSES**Verbal Comments**

Comment: I am pleased that the Air Force is doing drum removal. I am happy that Galena residents were involved in previous drum removals. Drums may exist in areas that are not adjacent to the Yukon River, such as the many sloughs within 30 miles down river from Galena. I would like the Air Force to exercise due diligence, by minimizing impacts to the environment while removing drums.

Response: In 2000, an investigation was conducted to locate Air Force drums in the floodplain of the Yukon River from Galena to the downstream end of Megotsol Island, downstream from Koyukuk, approximately 40 miles from Galena. Approximately 700 drums were identified and their locations were recorded. The sloughs were investigated. Air Force drums found during the investigation will be removed. The Air Force will work closely with property owners to coordinate work activities and minimize the impacts due to drum removal. This has worked well in the previous drum removals.

Comment: Could more contamination be caused by a release of drum contents?

Response: More contamination could be caused by a release of drum contents. The Air Force will remove drums to prevent potential releases of drum contents.

Comment: In areas where you find that contents have leaked out, is there a possibility of cleaning up the ground there?

Response: Yes. The Air Force will remove the contamination. In the study performed in 2000, more than 80% of the drums were found empty. No stressed vegetation, or anything else that would indicate contamination, was found. Only one drum had released contents. Less than one pound of tar had been released from that drum.

Comment: Both from the Tribe's viewpoint, and my own personal viewpoint, I think it's just better that it's cleaned up. When you're living off moose, rabbits, willow grouse, you're always wondering, is it contaminated? That's what I eat, the moose, the fish, the rabbits, the grouse. I know there are some drums located right behind my fish camp. If I was to catch a moose behind my fish camp, I would be wondering, should I be eating this moose? To me personally, and I am sure to other tribal members, it's of great concern. That's why we were pushing for the drum removal and cleanup. In the last contract, my son was on the last boat when the ice was running. If you're going to do drum cleanup using boats, it should occur earlier in the year. There are a lot of people in town that have been on the river for years.

Response: The goal of the cleanup is to protect human health and the environment. Food sources will be protected from potential contamination, by removing the drums and preventing a future release of drum contents. The work will be performed in the safest manner possible. A health and safety plan will be written to guide the work. The Air Force intends to involve workers with experience, to plan and manage the work. Human safety and welfare was a consideration during evaluation of alternatives to address the drums. Drum removal has been conducted in a safe manner with personal protective equipment, trained personnel, and appropriate procedures. The work will be planned so that it is conducted in the most appropriate season and in the safest manner.

Comment: Could you give us an idea of the timing of the cleanup?

Response: If the alternative selected in the Proposed Plan is not modified significantly, the drum removal can be performed in 2001.

Comment: I just want to say, "Thanks Scott, for all the work you've done on our behalf. I think it's terribly important. Although a lot of people don't show up, this is what we need. This is what we want. And I do support it."

Comment: I think it is important that the drums get retrieved to eliminate further contamination to the river system.

Comment: I want to commend you for doing the drum removal.

Written Comments

One written comment was received during the public comment period.

Comment: Gana-A'Yoo, Limited (GYL) concurs with the conclusion stated in the Galena Airport Proposed Plan to remove drums and potential sources of contamination found in the scope of work area.

APPENDIX A
REFERENCES

The selected remedy was based upon documents listed in this appendix.

U.S. Air Force. *Galena Airport and Campion Air Station Remedial Investigation Report* (March 1996).

U.S. Air Force. *Drum Survey Report* (June 1998).

U.S. Air Force. *Proposed Plan for Cleanup* (December 2000).

U.S. Air Force. *Galena Airport, Alaska, Drum Removal Actions Report, Final* (December 2000).

U.S. Air Force. *Final Remedial Investigation Report, Drum Investigation for Drums Down River from Galena Airport, Galena Alaska* (February 2001).

APPENDIX B
ACRONYM LIST

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DD	Decision Document
IRP	Installation Restoration Program
RAO	remedial action objective
RI	Remedial investigation
USC	U.S. Code