



**POINT LONELY SRRS
ALASKA**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 16

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

16

WALTER L. HICKEL GOVERNOR

File:

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17B-35

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November 8, 1991

16
Northern Regional Office
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Fairbanks, AK 99701-4980

Lt. Colonel Patrick M. Coullahan
Commander, 5099th CEOS
Building 21885 Second Street
Elmendorf AFB, 99506-4420

Dear Colonel Coullahan:

RE: 1991 Comments on Alaska North Slope DEW Line Sites; Installation Restoration Program; Phase II Technical Support Documents for Record of Decisions; **POW-2** (Oliktok), **POW-M** (Barrow), **LIZ-3** (Wainwright), and **LIZ-2** (Point Lay); and Phase II Remedial Investigation/Feasibility Study for: **BAR-M** (Barter Island), **POW-3** (Bullen Point) and **POW-1** (Point Lonely).

The Alaska Department of Environmental Conservation (ADEC) has completed its review of United States Air Force (USAF) Technical Support Documents for four DEW-line facilities in Northern Alaska. These facilities include POW-2 (Oliktok), POW-M (Point Barrow), LIZ-3 (Wainwright), and LIZ-2 (Point Lay). ADEC had also completed its review of the Remedial Investigation/Feasibility Studies for three DEW-lines including BAR-M (Barter Island), POW-3 (Bullen Point), and POW-1 (Point Lonely). With the exception of Wainwright and Bullen Point, all these sites were recently visited by USAF and ADEC staff during August 12-15, 1991.

The purpose of this letter is to formally summarize the position of ADEC regarding the Air Force's conclusions to consider no further action at nearly all 43 sites. In particular, this letter addresses three specific areas of environmental concern that constitute violations of Alaska Statutes and Regulations pertaining to pollution control. ADEC believes that remedial action should be expedited at three particular sites to negate or stabilize present and ongoing pollution discharges. These sites were visually observed by ADEC in 1991 and include:

1. The Old Landfill at Barter Island, where ongoing, improper waste disposal practices include hundreds of open drums of human waste, uncontrolled trash and debris, and landfill leachate and erosion, all of which constitute an imminent risk to human health and the environment;
2. The Contaminated Ditch at Barter Island, where trash, debris, heavy rust, and an oil sheen on surface water, coupled with a potential ongoing leaky fuel line, create a runoff problem which impacts the Beaufort Sea; and
3. The Gasoline Storage Pad at Oliktok Point, where the petroleum-saturated gravel pad was visibly observed to have impacted surrounding tundra wetlands, and where heavy oil staining was observed beneath the shop maintenance building.

Attach 2 - see 2 13 Nov 91
[Signature]

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Please find photographs taken by ADEC this summer showing each of the three areas of concern. These three sites are in violation of one or more of the following State statutes or regulations:

46.03.100 (a). A person who constructs an operation that results in the disposal or solid or liquid waste material...into waters or onto lands of the state shall procure a permit from the department before disposing of the waste material or water." (46.03.110 describes the waste disposal permit procedure.)

AS 46.03.710. "A person may not pollute or add to the pollution of the air, land, subsurface land or water of the state."

AS 46.03.740. "A person may not discharge, cause to be discharged, or permit the discharge of petroleum...or a residual product of petroleum into, or upon the waters or land of the State..."

AS 46.03.810 (a). "A person is guilty of creating or maintaining a nuisance if the person (2) allows to be placed or deposited upon any premise owned by the person or under the person's control garbage, offal, dead animals or any other matter or thing which would be obnoxious or offensive to the public or which would produce, aggravate or cause the spread of disease or in any manner endanger the health of a community"

18 AAC 60.015. "...a person who...owns or operates an industrial or commercial facility or a public place shall, until the waste can be disposed of, (1) store solid waste in a safe and sanitary way that prevents a litter violation under AS 46.06.080; and ...(3) keep the premise free of solid waste that may create a health hazard."

18 AAC 75.140 (a). "Immediately upon becoming aware of a discharge of a hazardous substance to the water or land of the state, persons responsible for that discharge shall cleanup and dispose of material collected using methods for which prior approval, oral or written, has been granted by the regional supervisor or his designee. The discharge must be cleaned up to the satisfaction of the regional supervisor or his designee."

Because of the ongoing nature of the pollution occurring at these three sites, and the potential risks to the public and the environment, ADEC requests that the Corps expend extra effort to expedite its remedial response.

In regards to the remaining 40 sites, under the authority of AS 46.03.020, ADEC has reached the following conclusions. At ten sites, 21, 22, 24, 34, 36, 41, 42, and POW-3 sites 1, 2,3, the Department concurs that no further action is necessary. However, at the remaining 30 sites, the Department has determined that the available site evaluations have been deemed inadequate, due primarily to the lack of analytical data, and that further investigations, or action as recommended in the IRP, are required to better delineate or correct the extent and magnitude of the problems. These 30 sites include coastal landfills, old spill sites, fuel and drum storage areas, and a sewage lagoon. The Department will not accept a No Further Action approach without sufficient analytical data, or without a proper risk assessment.

Site-Specific Issues

The following sites list summarizes environmental problems at each of the seven stations:

STATION	SITE #	PROBLEM
Barter	1.	Old Landfill
		Debris, drums, trash falling into ocean, drainage erosion, improper waste disposal
BAR-M	2.	Sewage Lagoon
	3.	POL Catchment
	4.	New Landfill
	8.	Contam. Ditch
	12.	Runway Dump
		Algae bloom
		Site of old POL disposal
		Litter on tundra
		Sheen, rust, trash, debris, erosion, possible leaking diesel line
		Large amounts of metal debris in tidal zone
Bullen POW-3	13.	Dump Site East
		(sites below included in 1988)
	1.	Shed 1.
	2.	Shed 2.
	3.	Out. Transformer
	4.	In. Transformer
	5.	POL Tanks
6.	Old Landfill	
		Debris in lagoon, exposure and erosion possible
		No problem determined
		No problem determined
		No problem determined
		Possible PCB contamination
		Fuel in rusty tanks
		(same as Site 13.)
Oliktok POW-2	16.	Old Landfill
	17.	Current Dump Site
	18.	Storage Dock
	19.	POL Storage
	20.	Diesel Spill
	21.	Drum Storage
	22.	Diesel Storage
	23.	Gasoline Storage
24.	Diesel Storage	
		Old waste storage not properly characterized
		Old waste storage not properly characterized
		Old drum storage not properly characterized
		Site not properly characterized
		Site not properly evaluated
		No problem determined
		No problem determined
		Pad saturated with fuel, impacted tundra
		No problem determined
Lonely POW-1	25.	Sewage Disposal
	26.	POL Storage
	27.	Beach Tanks
	28.	Petroleum Storage
	29.	Fuel Spill Area
	29A	Fuel Spill Area
		Soil contamination: TPH
		Soil contamination: TPH
		Soil contamination: TPH
		Minor spillage, old and new drums on site
		Large Area impacted by spill, not cleaned up
		Large Area impacted by spill, not cleaned up

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31. Old Dump Area
32. Husky Dump Site

Debris eroding into lagoon
Soil contamination: TPH, solvents. Erosion.

STATION	SITE #	PROBLEM	
Barrow POW-M	33.	Diesel Spill	Evidence of sheen, impacted tundra
	<hr/>		
Wainwright LIZ-3	34.	POL Storage Tank	No problem determined
	35.	Drum Storage	Site not properly characterized
	36.	MOGAS Tanks	No problem determined
	37.	Diesel Spills	Large not cleaned up, poorly defined
	38.	Current Landfill	Site not properly characterized
	39.	Abandoned Landfill	Site not properly characterized
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Point Lay LIZ-2	40.	Deactivate Landfill	Leachate threatens lagoon
	41.	Gas/Fuel Storage	No problem determined
	42.	Diesel/Drum Storage	No problem determined
	43.	Old Dump Site	Site not properly characterized
	44.	Old Dump Site	Site not properly characterized

General Issues

Priority Sites:

As is evidenced, a wide variety of site conditions prevail. Sites such as the Old Landfill and Contaminated Ditch at Barter Island, and the Gasoline Storage Area at Oliktok, should require attention soon. Sites such as the Tank Farms at Point Lay and Wainwright may not require further investigation or remediation, but without analytical data to substantiate these conclusions, ADEC cannot be assured that cleanup has been satisfactory.

Other Department of Defense Sites:

As you may know, ADEC is also overseeing corrective action at 15 other DEW Line Stations under the authority of the US Army Corps of Engineers. One primary difference in the investigatory approach taken by the Air Force in delineating site conditions is the virtual lack of analytical data to map potential soil, sediment, and surface water contamination. The Corps, on the other hand, has conducted a comprehensive sampling program at their sites in 1989-90. The results of these analyses show some degree of petroleum, solvents, PCB's, pesticides, asbestos, and other pollutants of concern at virtually every site. That the Air Force does not have a comparable

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database of results causes the Department to speculate whether or not these 41 sites have been appropriately delineated.

Potential Receptors:

The Department has heard repeatedly from the Air Force that the remote location, lack of adjacent human populations, and lack of groundwater resources at the subject DEW Lines prompt the foregone conclusion that no valid receptors can be easily identified. However, ADEC has specific documentation from the North Slope Borough and the Village of Kaktovik that explicitly states a relationship of North Slope Village inhabitants to the DEW Line Stations. In particular, the Village of Kaktovik has documented their concern about the debris from the Barter Island Station's Old Landfill intruding upon their traditional whaling grounds. Thus, ADEC believes that human and environmental receptors have not been properly identified.

Consistency with Alaska Environmental Laws:

The Department wishes to point out that USAF is obligated to comply with all relevant Alaska State Statutes and Regulations, including but not limited to AS 46.04 Pollution Control, AS 46.09 Oil and Hazardous Substance Releases, 18 AAC 60 Solid Waste Management, 18 AAC 62 Hazardous Waste, 18 AAC 70 Water Quality Standards, 18 AAC 72 Wastewater Disposal, 18 AAC 75 Oil and Hazardous Substance Pollution Control, and others.

Summary

The Alaska Department of Environmental Conservation has been actively working with the United States Air Force for many years in order to negotiate terms that would result in corrective action at DEW Line Stations Barter Island, Bullen Point, Oliktok, Point Barrow, Wainwright, and Point Lay

Forty-three areas of environmental concern from seven USAF facilities were reviewed and many were visited by a joint ADEC/USAF team in 1991. The Department has concluded that of these 43 sites, ADEC recommends immediate corrective action for 3 sites, additional analysis or remediation at 30 sites, and no further action for the remaining 10 sites. Please note that the No Further Action alternative, because of the lack of valid and substantive analytical data, does not relieve the USAF from undertaking future corrective action should site conditions change or become a concern.

The Department suggests a meeting in the near future with the Air Force to discuss current site conditions and to better coordinate future environmental negotiations. Please call Ms. Rielle Markey at 451-2117 to discuss a time and place. If you have any questions regarding the contents of this letter, please feel free to call me at 451-2101.

Sincerely,



William D. McGee
Regional Supervisor
Northern Regional Office

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wdm/bt/jw

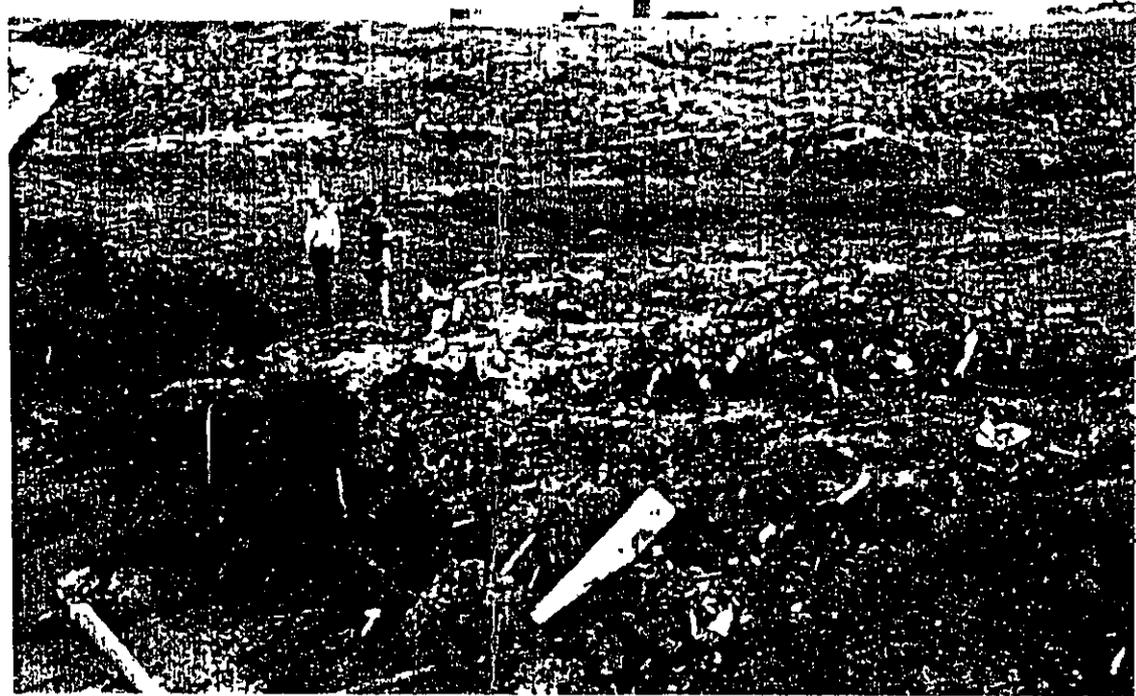
cc: Pete McGee, ADEC/Fairbanks
Ed Armstrong, ADEC/Fairbanks
Rielle Markey, ADEC/Fairbanks
Doug Lowery, ADEC/Fairbanks
Kris McCumby, ADEC/Fairbanks
Scott Home, ADEC/Fairbanks
Mary Siroky, EQ/CS/Juneau
Rich Cormack, EQ/CS/Juneau
Miller "Shep" Dale, SCRO/Anchorage
William Thomas, Arctic Slope Regional Corp/Barrow
Archie Brower, Kaktovik-Inupiat Native Corp/Kaktovik
Herman Aishanna, Mayor, City of Kaktovik
Lily Anniskett, Mayor, City of Point Lay
Chris Mello, North Slope Borough/Barrow
Tom Leavitt, North Slope Borough/Barrow
Elaine Snyder-Conn, USFWS/Fairbanks
Sverre Pederson, ADF&G/Fairbanks
Dale Berry, US Army Corps/Anchorage
Cameron Leonard, AGO/Fairbanks

350.38.001 Barter
375.38.002 Bullen
300.38.013 Oliktok
320.38.004 Lonely
310.38.004 Barrow
425.38.001 Pt. Lay
360.38.002 Wainwright

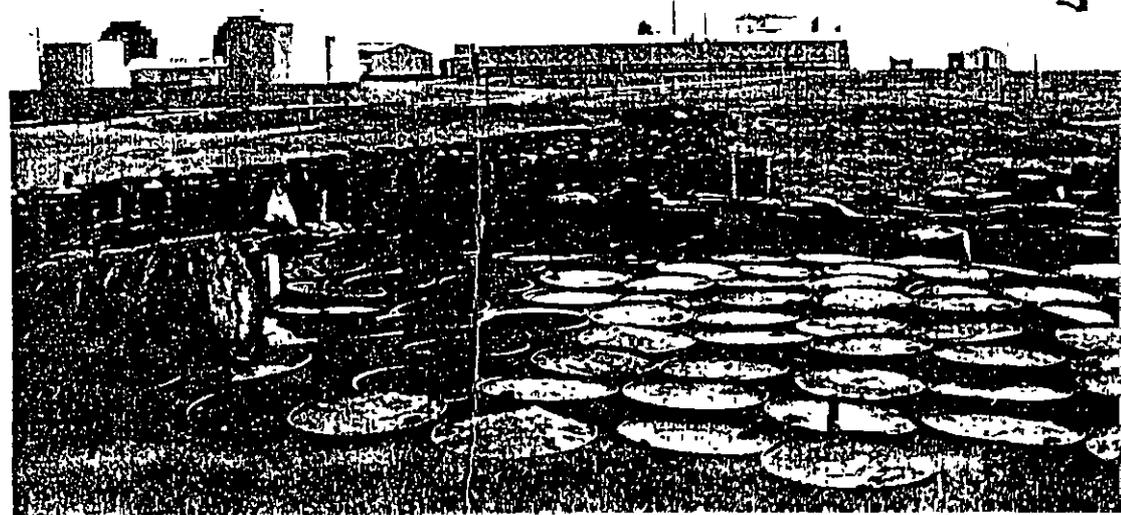
Below, uncontrolled drums of sewage



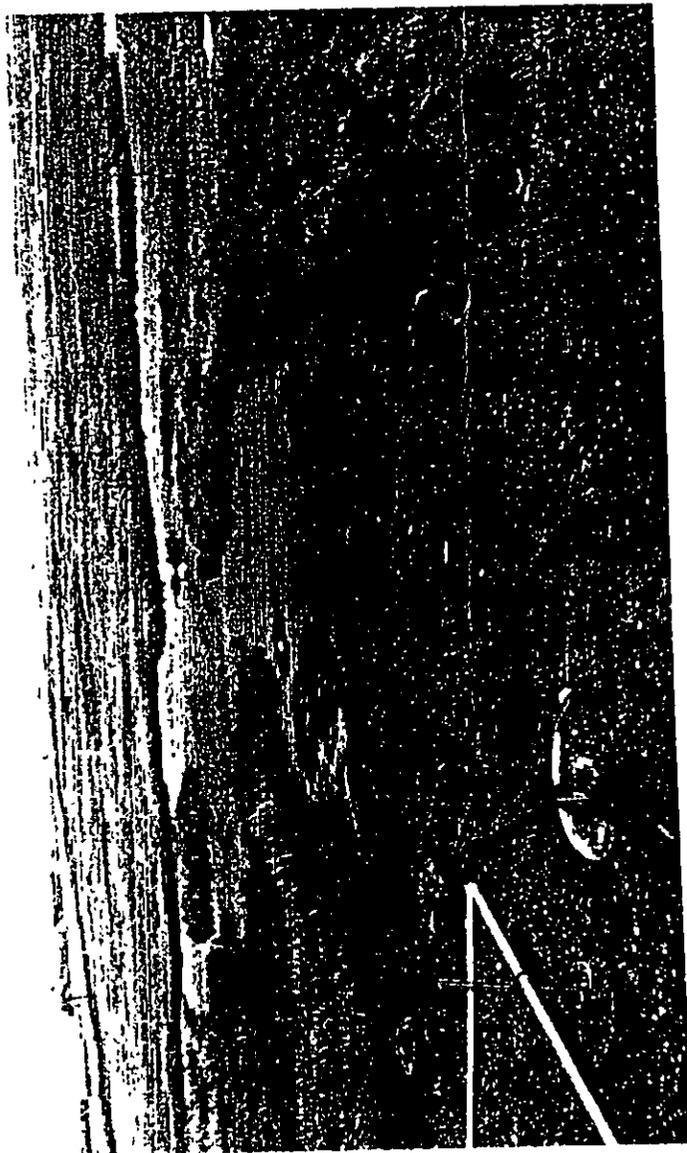
Below, eroding dump and shoreline



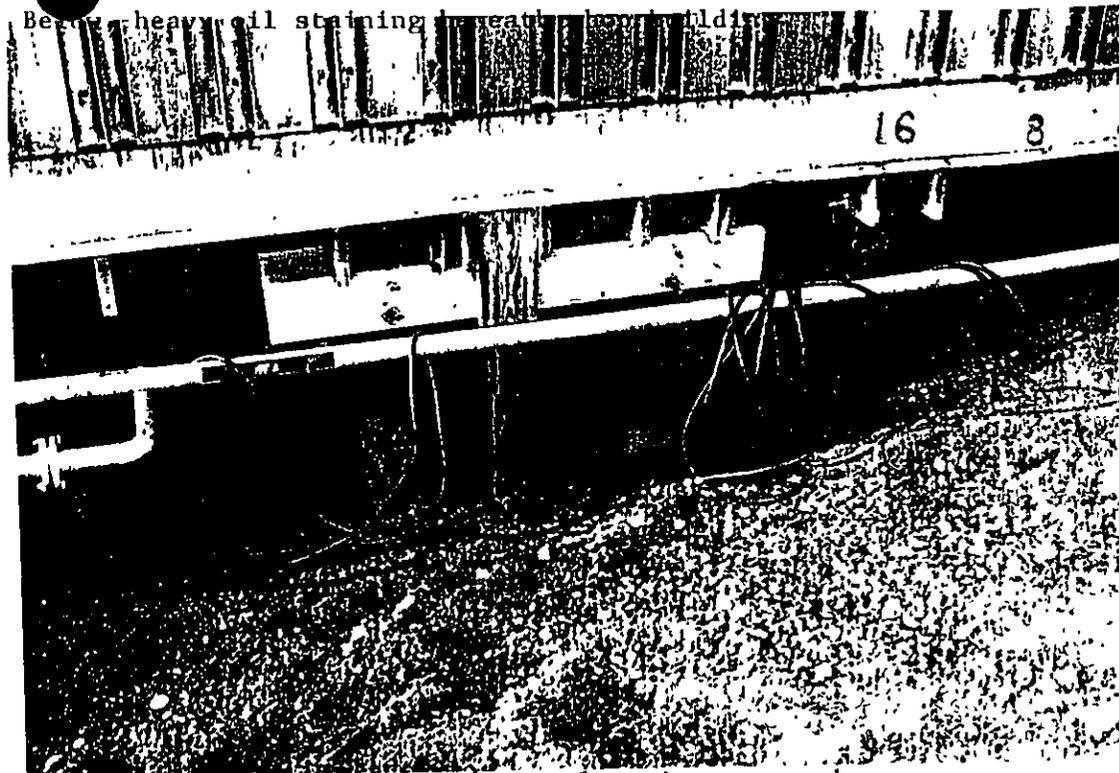
Below, stockpile of drums of wastes



Oliktok DEW Line, Gasoline Storage Pad Site
Photo taken 8/13/91 by ADEC Staff



Above, southeast edge of gravel pad, dead
vegetation, and tundra wetlands



Below, petroleum-saturated gravels emit strong sheen



Barter Island DEW Line, Contaminated Ditch Site
Photo taken 8/12/91 by ADEC Staff

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Below, sheen in ditch, Beaufort Sea in background



Below, diesel line, drainage ditch, rust and sheen in water



Above, rusty drums in ditch

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