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Sample Groundwater Trichloroethene Tetrachloro Well ID Date Sample ID Elevation (ft) (TCE) (PCE)		Well ID Sample Date Sample ID Groundwater Elevation (ft) Trichloroethene (TCE) Tetrachloroethene (PCE) Degradation Products MW77
MW82 Screen JUL 2010 10FWAMW82-GWS 431.41 0.000024 0.0000 Interval OCT 2010 10FWAMW82-GWF 430.82 0.000067 0.0000 [Ft bgs] JUL 2011 11FWAMW82-GWS 433.00 0.000029 ND (0.00 0CT 2011 11FWAMW82-GWF 432.23 ND (0.0005) ND (0.00 JUL 2012 12FWAMW82-GWF 434.35 ND (0.0005) ND (0.00 SEP 2012 12FWAMW82-GWF 434.08 ND (0.0005) ND (0.00	2 0.00087 ND (0.00045) ND (0.00045) ND (0.00002) 005) 0.00069 ND (0.00045) ND (0.00045) 0.000048 005) 0.0008 ND (0.00045) ND (0.00045) ND (0.000045) 005) 0.0008 ND (0.00045) ND (0.000045) ND (0.00002) 005) ND (0.0005) ND (0.0005) ND (0.0005) ND (0.0005)	Screen OCT 2008 08FWBMW77-GWF 436.69 0.0012 ND (0.0001) ND (0.00014) 0.00046 0.00018 ND (0.000097) Interval JUN 2009 09FWBMW77-GWF 436.69 0.0012 ND (0.00031) ND (0.00031) 0.00038 ND (0.00031) ND (0.00031) (Ft bgs) SEP 2009 09FWBMW77-GWF 436.04 0.00128 ND (0.00031) ND (0.00045) ND (0.00021) ND (0.00041) ND (0.00041) ND (0.00045) ND (0.00022) ND (0.00045) ND (0.00021)
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Sample Groundwater Trichloroethene Tetrachloro Well ID Date Sample ID Elevation (ft) (TCE) (PCE)	Degradation Products MW3	OCT 2010 10FWAMW38-GWF 431.43 0.00021 0.00012 0.000068 0.00017 ND (0.00045) ND (0.00002) JUL 2011 11FWAMW38-GWS 433.81 0.00015 ND (0.00036) ND (0.00045) ND (0.00045) 0.000017 OCT 2010 11FWAMW38-GWS 433.81 0.00015 ND (0.00036) ND (0.00045) ND (0.00045) 0.000017 OCT 2011 11FWAMW38-GWF 432.96 0.00017 ND (0.00034) ND (0.00045) ND (0.0002) JUL 2012 12FWAMW38-GWF 434.86 0.00022 ND (0.0005) 0.00019 ND (0.0005) 0.00019 ND (0.0005) SEP 2012 12FWAMW38-GWF 434.60 0.00019 ND (0.0005) ND (0.0005) 0.00016 0.00018 ND (0.0005)
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JUL 2012 12FWAMW43-GWS 434.95 0.00091 ND (0.00 SEP 2012 12FWAMW43-GWF 434.66 0.00061 ND (0.00		58 MW42 MW40
Consite Well Cadd Airfield Cadd Airfield Consite Well Consite Well Constant of the second	Notes: Units: mg/L ND: not detected Ft bgs: feet below ground surface Tricklereathere (TCF) preject cleanup level = 0.005 mg/l	The F or S at the end of the sample ID indicates the spring or fall sampling event. (F) or (S) is appended to the sample ID where the
Post Water Supply Well	Trichloroethene (TCE) project cleanup level = 0.005 mg/L cis-1,2-Dichloroethene ADEC action level = 0.07 mg/L 1,1-Dichloroethene ADEC action level = 0.007 mg/L trans-1,2-Dichloroethene ADEC action level = 0.1 mg/L	original sample ID did not include an F or an S.FORMER COMMUNICATIONS SITE (NORTH)Results are presented without qualifiers.HISTORICAL TRICHLOROETHENE RESULTSBOLD indicates detections of degradation products.FOR IN-PLUME AND SURROUNDING WELLSFOR TWAINWRIGHT, FAIRBANKS, ALASKAFOR TWAINWRIGHT, FAIRBANKS, ALASKA









N		WDMW13-GW	433.57	ND (0.0003)	001001	001 2007	07FVVAIVIV08-GVV(F)	432.90	ND (0.0003)			
Inter	val MAY 2008 08F	WDMW13-GW	NM	0.00021	Interval	MAY 2008	08FWAMW08-GW(S)	NM	0.000023	Alder	Ave	
(Ft br	gs) OCT 2008 08F	WDMW13-GWF	434.17 N	ND (0.000014)	(Ft bgs	OCT 2008	08FWAMW08-GWF	433.60	0.00026			
7-1	7 MAY 2009 09F	WDMW13-GW	433.42 N	ND (0.000014)	9-19	MAY 2009	09FWAMW08-GW(S)	433.15	0.000024			
Richardson Highway	SEP 2009 09F	WDMW13-GWF	433.37 N	ND (0.000014)			09FWAMW08-GWF	433.05	0.000034			
aluson High	JUL 2010 10F	WAMW13-GWS	432.6	ND (0.0003)		JUL 2010	10FWAMW08-GWS	432.45	ND (0.0003)		7	
gilway		WAMW13-GWF	IDEIED	ND (0.00045)			10FWAMW08-GWF	428.85	ND (0.00045)		15°	
		WAMW13-GWS	100101	ND (0.00045)			11FWAMW08-GWS	434.08	ND (0.0001)	Estimated	= 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1	
		WAMW13-GWF	100110	ND (0.00045)			11FWAMW08-GWF	433.40	0.000057	Groundwater		
		WAMW13-GWS		ND (0.0002)			12FWAMW08-GWS	435.82	0.00013	Flow Directio	n h	
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	Sample			Groundwate		L T	v	Well ID	Date	Sample ID	Elevation (ft)	Result	2		Well ID	Date	Sample ID	Elevation (ft)	DRO Result	
Well ID	Date	Sa	ample ID	Elevation (ft)	Result	TW6		MW33				7	4	MW13	MW62					
MW12						1	5	Screen	OCT 2007	07FWBMW33-GW(F)	432.53	28	-	₽	Screen	OCT 2007	07FWAMW62-GW(F)	433.46	0.61	
Screen	MAY 2008	08FWB	3MW12-GW(S)	435.27	5.6			Interval	MAY 2008	08FWBMW33-GW(S)	432.34	10			Interval	MAY 2008	08FWAMW62-GWS	433.54	0.041	
nterval	OCT 2008	08FWE	BMW12-GWF	436.00	11	17177-16	(08FWBMW33-GWF	433.11	29			(Ft bgs)		08FWAMW62-GWF	434.24	7.7	
Ft bgs)	MAY 2009	09FWB	3MW12-GW(S)	435.63	7.4	/76 🕂		8-18	MAY 2009	09FWBMW33-GW(S)	432.76	13			7-17	MAY 2009	09FWAMW62-GWS	433.89	ND (0.8)	
5-18.5	SEP 2009	09FWE	BMW12-GWF	435.43	4.9	1			SEP 2009	09FWBMW33-GWF	432.57	13				SEP 2009	09FWAMW62-GWF	433.67	ND (0.784)	
ľ	JUL 2010	10FWA	AMW12-GWS	434.82	5.3	1			JUL 2010	10FWAMW33-GWS	431.94	10				JUL 2010	10FWAMW62-GWS	433.04	0.38	
ľ	OCT 2010	10FWA	AMW12-GWF	434.35	6.5	1			OCT 2010	10FWAMW33-GWF	431.47	31				OCT 2010	10FWAMW62-GWF	432.68	29	
ľ	JUL 2011	11FWA	AMW12-GWS	436.45	9.8	1			JUL 2011	11FWAMW33-GWS	433.59	6.7				JUL 2011	11FWAMW62-GWS	433.78	0.22	R
	OCT 2011	11FWA	AMW12-GWF	435.86	12	1			OCT 2011	11FWAMW33-GWF	433.02	22				OCT 2011	11FWAMW62-GWF	434.16	18	
	JUL 2012	12FWA	AMW12-GWS	435.19	12	1			JUL 2012	12FWAMW33-GWS	435.16	12				JUL 2012	12FWAMW62-GWS	435.17	0.092	
1	SEP 2012	12FWA	AMW12-GWF	434.89	9.2	1			SEP 2012	12FWAMW33-GWF	434.87	19				SEP 2012	12FWAMW62-GWF	434.87	0.14	
150		de la	327			Sample	Notes: Project cl	leanur) level: 1	5				All Locat	ons Are	Approxima	ate		N	_
A DECEMBER		N.	198.5.	+ -		edance	Notes: Project cl Units: mg Method: <i>I</i>	g/L '		5	0	:	250	All Locati	500)	ate 750	1,000	N	
A COLOR		lett	Alteriated	+ -	Excee Dnsite	edance Well	Project cl Units: mg	g/L '		5	0			All Locati)		1,000	N	
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State of the second sec		Ledd	Airfield	+ C + C + -I	Excee Onsite 012 S No Exc Post W	edance Well Sample ceedance /ater	Project cle Units: mg Method: A The F or 3 sample IE spring or RED exce	g/L AK102 S at th D indic fall sa eeded	2 ne end of cates ampling. I the proje	the ect cleanup level.	0		250 H	wgs FOR	500 Fee 1984 UT MER RICAL	M Zone 6 COMM	VUNICATIONS	S SITE RGANICS		
A CONTRACTOR	1	100		+ C + C + -I	Excee Onsite 012 S No Exc Post W	edance Well Sample ceedance /ater	Project cl Units: mg Method: A The F or 3 sample IE spring or RED exce DRO: Die	g/L AK102 S at th D indic fall sa eeded esel-ra	2 ne end of cates ampling. I the proje	the ect cleanup level. nics (C10-C25)	0		250 H	WGS FOR ISTOF S FOR	500 Fee 1984 UT MER RICAL	COMM DIESE	UNICATIONS L RANGE OF AND SURRO	S SITE RGANICS UNDING		
and the second s	1	100	Airfield	+ C + C + -I	Excee Onsite 012 S No Exc Post W	edance Well Sample ceedance /ater	Project cl Units: mg Method: A The F or 3 sample IE spring or RED exce DRO: Die Results a	g/L AK102 S at th D indic fall sa eeded esel-ra are pre	2 ne end of cates ampling. I the proje	the ect cleanup level. nics (C10-C25)	0		250 H JLTS	WGS FOR ISTOF 5 FOR FORT	500 Fee 1984 UT MER RICAL	COMM DIESE LUME /	N N UNICATIONS L RANGE OF AND SURRO FAIRBANKS, AL	S SITE RGANICS UNDING	WELLS	
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FORT WAINWRIGHT, ALASKA

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FIGURE NO. : A-24



APPENDIX B

Applicable or Relevant and Appropriate Requirements

Table B-1 Chemical-Specific Applicable and Relevant and Appropriate Requirements Former Communications Site, Fort Wainwright, Alaska

Standard, Requireme	nt, Criterion, or Limitation	ARAR Status	Description
Alaska Oil and Other Hazardous Substances Pollution Control	18 AAC 75.345	Applicable	Table C establishes groundwater cleanup levels for the site (i.e., DRO, RRO, and 1,2,3-TCP).
National Primary Drinking Water MCLs	40 CFR 141	Relevant and Appropriate	Establishes primary drinking water standards (MCLs) pursuant to section 1412 of the Public Health Service Act, as amended by the Safe Drinking Water Act (Pub. L. 93-523) and establishes the MCL for TCE.

<u>Notes:</u> AAC = Alaska Administrative Code

ARAR = Applicable or relevant and appropriate requirement CFR = Code of Federal Regulations MCLs = maximum contaminant levels

TCE = trichloroethene

U.S.C = United States Code 1,2,3-TCP = 1,2,3-trichloropropane

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Table B-2 Action-Specific Applicable and Relevant and Appropriate Requirements Former Communications Site, Fort Wainwright, Alaska

Standard, Requirem	nent, Criterion, or Limitation	ARAR Status	Description
	18 AAC 75.355(b)	Applicable	ADEC requirement that sampling and analysis be conducted or supervised by a qualified, objective person.
Alaska Oil and Other Hazardous Substances Pollution Control	18 AAC 75.360	Applicable	ADEC requirement that the site cleanup be conducted or supervised by a qualified person.
	18 AAC 75.375(c)	Applicable	ADEC requirements for selection and implementation of institutional controls.
Implementation of Institutional Controls	SPAR Guidance 2011	твс	Describes steps to create, remove, and track institutional controls.

Notes: AAC = Alaska Administrative Code

ADEC = Alaska Department of Environmental Conservation

ARAR = Applicable or relevant and appropriate requirement

TBC = To be considered 1,2,3-TCP = 1,2,3-trichloropropane

APPENDIX C

Public Participation

PUBLIC NOTICE THE UNITED STATES ARMY INVITES PUBLIC COMMENT ON THE PROPOSED PLAN AND AFTER ACTION MEMORANDUM FOR THE FORMER COMMUNICATIONS SITE (TAKU GARDENS), FORT WAINWRIGHT, ALASKA

PUBLIC MEETING ON JANUARY 15, 2013 AT THE FAIRBANKS PRINCESS HOTEL

The U.S. Army Garrison Fort Wainwright, as lead agency for environmental response actions on the installation, in partnership with the U.S. Environmental Protection Agency and the Alaska Department of Environmental Conservation, has developed a Proposed Plan and After Action Memorandum for the Former Communications Site (FCS). The U.S. Army is soliciting public review and comment on the recommendation to implement monitored natural attenuation and institutional controls for this site.

After January 2, 2013, copies of the Proposed Plan, After Action Memorandum, Remedial Investigation/Feasibility Study, subsequent reports and supporting documentation contained in the Administrative Record will be available for public review at the Fort Wainwright Public Library, Bldg 3700 Santiago Avenue, Fort Wainwright, Alaska, 99703, the Noel Wien Public Library, 1215 Cowles Street, Fairbanks, Alaska, 99701 and the U.S. Army Directorate of Public Works, Environmental Office, Building 3023, Engineer Place, Fort Wainwright, Alaska.

Individuals interested in reviewing the documents on post should allow additional waiting time in line to get the pass. Access to the Post requires non-residents/employees to get a pass at the Visitor's Center at the Main Gate on Gaffney Road. The U.S. Army encourages the public to participate in the decision-making process by offering comments on the Proposed Plan and After Action Memorandum.

The public comment period is January 14, 2013 through February 12, 2013. A public meeting will be held January 15, 2013 from 7:00 PM to 9:00 PM at the Fairbanks Princess Hotel, 4477 Pikes Landing Rd., Fairbanks, Alaska. Questions, comments, and responses on the Proposed Plan and After Action Memorandum will be recorded by a court reporter during the public meeting. Written comments will be accepted throughout the public comment period. Comments may also be submitted via a toll-free number (1-877-243-6974) or by sending an email to FCS-

Comments@jacobs.com. Individuals wishing to receive a response to their comments should indicate so in their message.

The FCS is located between Alder and Neely Roads, on Fort Wainwright, Alaska, and covers an area of approximately 54 acres. The site is the current location of the unoccupied Taku Gardens housing development, which the U.S. Army intends to open for residential occupation with EPA and ADEC concurrence. Soil and groundwater at the FCS were contaminated as a result of historical use and disposal activities during the 1950s. Soil at the site was contaminated with polychlorinated biphenyls (PCBs), petroleum, and volatile and semivolatile organic compounds. Groundwater was contaminated with petroleum and volatile organic compounds. Extensive site investigation and removal actions were conducted between 2005 and 2012. Potentially hazardous debris and contaminated soil above risk-based cleanup levels was removed to the greatest extent practicable. Diesel in subsurface soil is the only contaminant present above risk-based cleanup levels but does not pose an unacceptable risk to future residents provided they abide by the Institutional Controls.

The After Action Memorandum documents the removal of residual contaminated soil and debris encountered during earlier investigations and removal actions between 2005 and 2012. The Proposed Plan also documents all site investigation and removal actions of contaminated soil and buried munitions-related debris between 2005 and 2012, describes the remedial alternatives considered, and presents the Preferred Alternative. The Army, EPA, and ADEC evaluated the following remedial alternatives for addressing contaminated soil and groundwater at the site:

- Soil
- No Action
- Institutional Controls to Restrict Excavation
- Groundwater
- No Action
- Monitored Natural Attenuation and Institutional Controls to Prohibit Groundwater Use
- In Situ Chemical Oxidation and Institutional Controls to Prohibit Groundwater Use
- Permeable Reactive Barrier, Monitored Natural Attenuation, and Institutional Controls to Prohibit Groundwater Use.

Interested individuals should refer to the Remedial Investigation Report and other contents of the Administrative Record file for further information on all remedial alternatives considered. Electronic copies of these records will be available at the aforementioned locations after January 2, 2013.

The Preferred Alternative for the FCS is monitored natural attenuation and institutional controls for soil and groundwater. Groundwater monitoring will confirm that groundwater contaminant concentrations are naturally decreasing. Institutional controls limiting excavation of soil and prohibiting groundwater use at the FCS will continue to promote the ongoing protection of human health and the environment. Although this is the Preferred Alternative at the present time, the Army welcomes the public's comments on all of the remedial alternatives listed above. At the conclusion of the public comment period, the Army, in cooperation with the EPA and ADEC, will review all comments and select the best alternative based on the Evaluation Criteria and public input. The Final Remedy for the FCS will be chosen after the public comment period ends and after taking public comments into account.

The Army invites all residents of Fort Wainwright, the Fairbanks North Star Borough and other Stakeholders to attend a public meeting designed to provide attendees with a brief overview of the environmental cleanup and allow them the opportunity to ask questions and interact with representatives from the Army, the EPA and ADEC. Participants will have the opportunity to hear a briefing describing the work that has been accomplished at this site; look at static displays of the types of materials found during the remedial investigation; the types of sampling that were conducted on the site, and posters that chronicle the work completed at Taku Gardens. The doors will open at 6:00 PM. A short presentation will begin at 7:00 PM with questions and topics of discussion to follow immediately after the presentation.

For more information regarding this public meeting, the Proposed Plan, the After Action Memorandum, or the Administrative Record please contact Joe Malen at 907-361-4512 or Cliff Seibel at 907-361-6220.

1/15/2013

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6	PROPOSED PLAN FOR FORMER COMMUNICATIONS SITE (TAKU GARDENS) FORT WAINWRIGHT, ALASKA
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8	BEFORE JOSEPH MALEN,
9	Remedial Project Manager
10	Fairbanka Alaska
11	Fairbanks, Alaska Princess Hotel, Jade Room
12	4477 Pikes Landing Road Fairbanks, Alaska 99709
13	January 15, 2013 7:00 p.m.
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1	PROCEEDINGS
2	JOSEPH MALEN: Good evening, everyone. Like I said, my
3	name is Joe Malen and I'm the remedial project manager for the
4	Operable Unit 6 Taku Gardens site out on Fort Wainwright. I'd
5	like to thank you all for coming and I would like to recognize
6	a few of our distinguished visitors or attendees at the moment,
7	and I would like to leave opening remarks to Col. Johnson, who
8	is the Garrison commander, to give opening stuff. If you want
9	to do it from there or here, it's up to you, sir.
10	COL. JOHNSON: No, I can come up there. Okay. How are
11	you doing? I'm Col. Johnson. So I'm the commander of Fort
12	Wainwright. So how many folks here aren't part of either
13	federal regulators, state regulators, or somebody that has
14	something to do with Fort Wainwright? How many are just
15	interested citizens? Okay. The reason I'm asking is so I'd
16	rather spend my time focusing on you guys and have our guys
17	focus on you because everyone else has been involved with this
18	for a long time because of what's going on.
19	So what we're doing today and I this evening, and
20	Joe will get into it is there anyone else presenting besides

21 you?

22 JOSEPH MALEN: No, sir.

COL. JOHNSON: Okay. So Joe will run through a whole bunch of stuff for you, but what this is, is part of the process that we have to do. There's a thing called CERCLA, and 1 it's a big acronym, but basically the CERCLA process is a
2 process that is basically focused on law, but, you know, we are
3 required to go through a process that talks about our
4 remediation and there's a whole bunch of steps and things we
5 have to do. But to make it simple, what we're doing tonight as
6 part of that is the public comment process.

7 So the whole intent tonight is to kind of present, hey, 8 here's what happened, here's what we found, here's what we did. 9 These were some of the things that were required, this is the 10 way ahead and what the future has for us. But as you go 11 through all of this, we are required by law to give the public 12 an opportunity to (1) get smart about what's going on and (2) 13 have some comments and ask some questions.

So we've got -- there's federal regulators here. 14 Jack is from EPA, there are folks from ADEC, Alaska state 15 regulators; there's a whole bunch of environmental folks from 16 the Garrison. So after Joe has gone through and given you all 17 this information, if you haven't already, feel free to go 18 around and look at these different boards, look at some of the 19 stuff here and ask any questions that you have, because there's 20 a lot of really smart people in the room that have been working 21 22 on this since around 2005. And I just happened to be the commander at Fort Wainwright back in 2005 when this all 23 started. In fact, it was like week into my command. I took 24 25 command and like four days later we figured out what was going

1	on; that we had an issue at Taku Gardens.
2	So I've got a lot of personal knowledge of what
3	happened for three years, and then I was gone and I just came
4	back about a year and a half ago and, you know, all this stuff
5	was supposed to be taken care of by the time I got back, but
6	here we are.
7	So, really, this is the one thing I want to say and
8	then I'll get out of here, is to me this is a good-news story,
9	Taku Gardens. And I don't know if Joe is going to get into

that as far as the process of what we've done, but as far as 10 the Army goes, and this is my own personal opinion, what I 11 think is good about this whole process is that, you know, we 12 were trying to build Army family housing on the installation 13 and during that time we saw that we had environmental issues. 14 So one of the things that could have happened is we could have 15 just shut the project down, stop construction, and probably 16 lost the project. What we did instead is we worked with 17 federal regulators and state regulators and we found a way to 18 figure out -- do site exploration and really find out, what do 19 we have? While we're doing that, continue with the 20 21 construction as we could.

So once we kind of searched and looked to see what was going on, in those areas where we didn't have problems, we kept the project going, and we also were allowed to do some remediation at the same time. So we'd find something -- find a

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1	mess, clean it up, keep building and keep going so that the
2	process didn't just stop. It kept going and that allowed us to
3	get where we're at today, which is an important part of that
4	whole CERCLA process, and I'll let Joe talk more about that.
5	But this, to me, is a good news story that we're
6	actually here today with the houses done, remediation done, and
7	we're ready to transfer assets from the Corps of Engineers
8	has already passed them back to us at Fort Wainwright; we're
9	ready to pass them to our privatized housing partner, and we're
10	ready to put families in those houses, in a safe environment
11	and take advantage of great houses that we really need.
12	So thank you very much, and we'll hang out afterwards;
13	if you've got questions, you can ask us.
14	JOSEPH MALEN: The other thing one of the things
15	that the colonel brought up was that this is the public
16	meeting is a requirement of public law. One of the other
17	things that's a requirement is that we're supposed to take a
18	verbatim transcript of the stuff that happens here. That's why
19	we have our court reporter that's over to my right, your left,
20	in the corner, and she's going to be taking the transcript of
21	all that's said during this meeting.
22	The other thing is, if you would like to make an
23	official public comment and you don't want to write it, you

25 record you as a verbatim transcript. If you have a comment, if

don't want to send an e-mail, you can come up and she will

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you have a question, if you have a request, that's the nice 1 lady that you would go to and make that known. 2 As we are going along and as I will be answering 3 questions, I would like to ask your indulgence that I could 4 carry a little pocket recorder so that questions, answers, and 5 responses can be recorded as well, and then I just turn them 6 over to her and it becomes a part of the record. If you don't 7 want to be recorded, we don't have to take your name, we don't 8 9 have to take anything like that; it can be an anonymous comment, it can be an anonymous question, but please let me 10 know so that, you know, we turn -- I don't take the recorder 11 with me and, you know, stick it up under your nose. So if you 12 have a question, you have a concern and you don't want to go on 13 official record or be recorded, please just let us know and we 14 can accommodate that need.

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We will make the com -- we will record the comment as 16 "someone asked," you know, and that will go in the record, but 17 you don't have to be officially there. 18

So I'd also like to recognize the other RPMs that are 19 part of this project. The colonel already spoke of Jacques 20 21 Gusmano. Mr. Gusmano is from Region 10 EPA. He has been with 22 the project since 2005 and is here currently with us. Ms. Deb Caillouet, which -- who is from the State of Alaska, is right 23 there in the back of the room, making sure that she makes faces 24 25 at me to make me laugh during the presentation. She's been

1 with the program since 2008.

We had to switch RPMs for the state, in the middle, but 2 Deb has caught herself up for everything that has happened in 3 '05 all the way up to present day. So she is as knowledgeable 4 as any of us to ask questions. We have regulators from the EPA 5 and the State of Alaska as a requirement; it's part of our 6 Federal Facility Agreement and it is part of the law of CERCLA. 7 And CERCLA stands for the Comprehensive Environmental Response 8 9 Compensation Liability Act. That's the great big thing, why we say CERCLA instead of the actual name of the act. 10

So if you have any questions, if you have any concerns, 11 I'd like to ask if you could wait until after the presentation, 12 but if something just jumps up and you've just got to ask a 13 question, I'll entertain questions during the presentation. 14 Just remember that the more questions you ask, the longer I 15 blather on. So if you want to get me to sit down and shut up, 16 you know, just wait till the end. But I will entertain, if you 17 have something that you would really like to have. 18

Okay. The reason that we are here, we are talking about the former communication site, otherwise known as Taku Gardens, and we want to give you a brief history of everything that has happened, what was done there in the past, what we found out, what we encountered during our construction, during our investigations, tell you where we are today, and where we think we're going.

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We also, again like we talked in the beginning, we want 1 to give you, the public, the opportunity to have your comments 2 known, ask your questions, and get the answers out to the 3 public that we can. We have also -- in our public notices, we 4 have put up a web site. Every piece of paperwork that we have 5 attached to this is in what is called the Administrative 6 Record, which is basically a record of every document, 7 everything that we did that led to a decision for where we are 8 9 today. And that is available online. It's part of the newspaper ad that we did. If you'd like to have it afterward, 10 11 please let me know and we can get it to you so that you can download it. 12

Okay. Any questions about what we're here for, what we want to do before I jump into this? Okay. Here we go. Roller coaster ride.

This is Taku Gardens back in the forties and fifties. 16 You can see that there's a lot going on in here. And what we 17 did is we superimposed where the houses are today over what was 18 there back in the forties and fifties. Up in the -- well, I 19 have a pointer; I can do this. Up here in this upper area --20 21 upper center area, this is what we call brigade and wing 22 section. That's where the troops were living, it's where their company stuff was, their storage, their equipment was all 23 stored in that area. We also had -- if I can get this thing to 24 25 move, you know, another offshoot over here. No one is quite

1 sure what that was, but, you know, they're there.

What we have in this area right here is what's called 2 Hoppe's Slough. It was a slough that came off the Chena River 3 at one time. It was basically filled over time as the troops 4 were putting more and more things in the area. The antenna 5 farm area is this area in here and we had what was called the 6 Air Force Secret Security Service that was stationed in there. 7 One of the unique things about all of the aerial photos that we 8 9 have is this area right here in the bottom, and it's always obscured and we could never figure out how they always took a 10 picture with a cloud over top of it. And it's kind of like, 11 duh, they obscured it on purpose so that you couldn't see what 12 13 was going on because it was a secret.

We also have a few other things that we care about 14 today. There's an asphalt batch plant and a concrete batch 15 plant up in that corner. We have a bunch of drums and what 16 have you that are stored over here on the far right-hand side 17 of the picture. And then, you know, down here is what we call 18 a "cannibalization yard." It was a bunch of equipment, like a 19 junkyard for the Army, and they would, you know, take pieces 20 21 and parts from different equipment and would use it and return 22 equipment to serviceable condition.

23 So there's a whole lot that we have going on around 24 here. So, you know, we go back in history as best we can. You 25 know, the problem is there's no absolute document as to what 1 was happening out there in a specific spot. I mean, back then,
2 they did what they were supposed to do and no one was expecting
3 that we were going to be here today doing what we're doing. So
4 we have to go and make our best guess as far as what we need to
5 look for and where we need to look for it.

The area that started the whole thing is down here in 6 the southwest corner. It is the old Building 52 site which is 7 down here. That's where we found PCBs during the initial 8 9 excavation of the foundation. We had several contractors working, a lot of heavy equipment going on, and one of the --10 the operator of the piece of equipment smelled something funny, 11 stopped his equipment, went through his chain and we ended up, 12 after sampling, found that there was PCB contamination. 13

It's not that big an area as far as where the main PCBs 14 were located, but what we did have, as the guy was pushing up 15 dirt, making his foundation hole, the soil pile that was 16 generated from that is where the PCB oils had gotten pushed up 17 into. The environmental office folks at the time said, hey, we 18 have this issue out here; we need to make it go away. And 19 as -- and what normally the rule is, as you're loading stuff 20 from the ground into a box to make it go away, you're supposed 21 22 to use water -- you know, a water misting spray to keep the dust down. The contractor said, well, you know, if a couple 23 gallons is good, a thousand gallons is better. And what he 24 25 ended up doing was spraying a whole bunch of water over top of

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that and made a mess, and we'll talk more about that later. 1 What we end up doing is we have a whole bunch of metal 2 that was found during the investigation and it was scrap metal 3 mostly, crushed up drums, pieces of equipment, beds, lockers. 4 Yes, we actually found a locomotive engine and, yes, we did 5 find a forklift that was buried on site. They were there. It 6 was a place where they were burying junk; we found it. There 7 were tank treads, there was Marsden Matting, which is a hasty 8 9 airfield material. All sorts of stuff that was out there.

10 Unfortunately, a couple of the drums had some petroleum 11 in it; it was not a big deal. We had to go and segregate that 12 stuff. There was a little bit of petroleum-contaminated soil. 13 That was segregated off in separate piles and then everything 14 that was not known to be contaminated was pushed off into other 15 piles within the compound.

So after we go through all of this stuff of what's 16 happening, and we decided that we needed to go and do further 17 investigation, we went and ran EM61, Electromagnetic 61, is the 18 name of the equipment that goes and generates this map that 19 we're seeing right here. And everywhere that you see dark 20 21 spots, that says that there's a lot of metal that's buried in 22 that place and we care about that because metal equates possibly to drums and drums we cared about because if there was 23 something in it, we wanted to make it go away. 24

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So what we ended up doing as the RPMs, we sat down and

1 said, okay, this is a big site. The contractor who was
2 building the housing has already removed a whole bunch of stuff
3 that was underneath and in and around the houses to get them
4 out of his way so that he could build his utilities and put the
5 houses up.

This is the stuff that was left afterward that we 6 needed to go back and find. This was done in 2007 and what I'm 7 going to lead you over to is my left, your right, we have yet 8 9 the large posters over there that kind of give you an idea -- a better idea of the type of stuff that was looked at. When you 10 look at the original housing, there were 88 borings that the 11 Corps of Engineers did before we even started shovel 1. And 12 all they found was junk and they found a little bit of 13 petroleum. And Alaska, and especially up at Fort Wainwright, 14 that's something that we find every day and we weren't really 15 concerned. There was no contamination found other than the 16 petroleum, with the exception of one PCB hit and when we went 17 back to look to see if there was anything there, we couldn't 18 replicate it, so we said we must have got it with the sample. 19

And we have over here on the far side, you know, you can actually see where the samples happened, where we stepped out, if you're interested.

And so with all the information that we had from our initial start in 2004 and we come out here to 2006 and we're at the point where we're saying, hey, we keep hitting this metal, there's a possibility for stuff in the drums, but we said we need to go and look at the places that had the most heavily -you know, heavily concentrations -- heavy concentrations of metal, which are the areas that we see here and down in here, and look at see what's there.

Well, your normal CERCLA process is you go in and you 6 do some borings and you say, okay, this is what we think is in 7 the soil, groundwater based on the information we have. Well, 8 9 it's a pretty big site and that's a lot -- you know, those are very big areas here that we're looking at when you look at how 10 much metal is there. So what we said was, you know, you're not 11 going to be able to do this with soil borings; let's get the 12 excavators in. And so what we did is investigation by 13 excavator, which, in our process, is probably the best way to 14 do it because you're getting a whole lot of dirt, you're 15 getting a great big picture instead of this very little, tiny 16 thing that you normally deal with. 17

18 So, again, these areas here that you see, the heavier 19 concentrations, that's where we focused our initial 20 investigations on. It expanded from there, and I'll go into 21 that a little bit later. Fine.

The EM61 map that you just saw, that's how we generate that thing. There's actually a guy that walked the entire compound, all 54 acres, just like that on a line. Some of it was towed when we had big open areas. And that's how the map was generated. The guys are looking like they're having all sorts of fun, don't they?

Okay. What was accomplished? You know, you start 3 looking at stuff, you try and put words, you know, to all this 4 stuff and you start thinking, oh, my gosh, we've really done a 5 whole bunch of work. And, you know, when you start talking 6 about 345,000 square feet, you're starting to talk eight acres 7 of area that we actually went and put backhoe into it, dug it 8 9 up, and made sure that there was nothing in the soil or, if there was something in the soil, it went away. 10

11 So we know that after we dug, we took samples at the bottoms of the holes and the side walls of the holes. If we 12 found anything in the holes that was a contamination, we dug it 13 out, put it in a box, made it go away. If it was clean, we'd 14 cite it as clean and moved on to the next area. The munitions-15 related debris, that's the stuff that's on my right, your left; 16 it's laying on the floor and I invite you to go and look at 17 that after the presentation. We also have UXO technicians that 18 are available, that can explain to you what it is that you're 19 looking at, if you're interested. 20

Two rocket motors were found. We have a rocket motor sitting there, you know, of what we had found. In the tail end, in the rocket part of the motor, there was some residual propellent and it's called residual propellent because it was all water-logged and basically degraded. But because the propellant was there and it was still inside the cup for the rocket motor, those two things get classified as discarded military munitions, meaning that there was an energetic source within the device itself, which were taken to the range, blown up and made go away.

Of the other items that you will see over here on 6 display, whenever they were found, they were treated as live 7 munitions until we could prove that there was nothing in them. 8 9 And the way that you find that there's nothing in them, either they're opened and you can see inside or we take them out to 10 the range and we put what's called a small donor charge and we 11 try and initiate an explosion. If all you do is make a hole in 12 the thing or dent it up and mangle it up a little bit, it's not 13 full of energetic material and is considered munitions debris, 14 and that's what we have over here. And that was the majority 15 of the stuff we found with the exception of the two rocket 16 17 motors.

You know, lots of -- you know, 389 tons. We have pictures of it over there on the wall that you can see and I'll flip it up here in a second. But that's a lot of metal, you know, and what we have in the picture over there is basically from one investigation, not all of them.

Nonservicable material that was hauled off: basically, when you have sandy silt, you can't build on it, it's not good for your gardens or anything like that. So 11,000 cubic yards

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went over to our landfill to be used as landfill cover, which 1 is about the best thing for it. 1,061 drums dug up; 608 empty, 2 meaning there was absolutely nothing in it; 445 had detectible 3 residue, meaning you could tell what was in it based on the 4 residue there, mostly oil. Eight had measurable liquid that 5 could be sampled. It came out mostly petroleum hydrocarbon and 6 one of them had something else added into it that was kind of 7 strange, but it was still mostly just fuel; nothing else was 8 9 hazardous.

The PCB-contaminated soil: 3,300 cubic yards is 10 Okav. a lot of soil and, again, the reason that that had to be dug up 11 that way is after I told you about the water being splashed on 12 the top of the pile, it made the soil run away from the pile 13 and out into the area around it. So we had to clean all of 14 that stuff up, which is why this number gets to be so huge. 15 The 3,300 cubic yards of petroleum-contaminated soil, again, 16 petroleum is something that we encounter all the time. We get 17 it out of the way, we dig it up, we take it to OIT downtown, 18 down in North Pole, and have them burn it, and then they bring 19 that soil back and we put it in the landfill. The asbestos and 20 solid waste, you know, again, it's just stuff that we normally 21 22 encounter. It's not a big deal. Well, it's a big deal as far as we've got to make it go out of there, but it's now all gone, 23 no longer an issue. We have none of that stuff left that we 24 25 know of.
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This is a picture -- this is building -- what are we 1 doing? Oh, okay. That's right in the middle of 15, 17, and 2 19, which is in the northern side of the northeast corner of 3 the compound. This is what we were dealing with and what 4 you're looking -- right here at the bottom, those are the --5 what the drums look like. Some of them actually look like they 6 were intact; others were all crushed up and mangled like we 7 have here and over in here. We dug the stuff out, had to 8 9 unearth utilities, we came as close to the buildings as we could without compromising the foundations, and if we found, 10 you know, drums or containers like this out there, when we were 11 all done cleaning the solids out, we went and did lab samples 12 to make sure that there was nothing from that drum and history 13 left in the soil. If it was, it was dug up and made go away. 14 15 This is the same excavation that you just saw. They basically -- you know, what you were seeing was right along 16 here and we had to go and do this backfill because, as you can 17

see, we have utility poles that we had to go and replace. So 18 this excavation actually went all the way against the house 19 and, as you can see, this excavation down here, that's actually 20 18 feet deep. We were right over top of groundwater and 21 22 when -- we have that picture over there on the -- your righthand side there, you'll actually see orange pin flags and 23 that's where we took our samples to prove that we were actually 24 25 clean. So that is a huge hole and everybody gets excited when

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I say this, but that hole is clean. We have sampled that hole.
We have looked at that -- we've pulled everything out, we went
down to groundwater, there's nothing in the groundwater over
there and there's nothing in the soil. It's clean. You know,
and that was the object of the drill; that when we got to those
sort of things, we could actually go back and tell everybody
who shows up, "That's clean."

I was telling you about the junk that was pulled out. 8 9 That's part of that 296 tons that we pulled out. We actually -- this is just from building 15, 17, and 19, that 10 area that you just saw exhumed. That's the stuff that we 11 pulled out. That's an actual house behind it, so it'll give 12 you an idea of the scale of just how big that pile of stuff 13 was. And it's basically just a whole bunch -- a potpourri of 14 Marsden Matting and commo wire and tank treads and drums and 15 just metal, junk. 16

This here -- we actually only had one building that we 17 observed drums underneath the building. This is building 49L, 18 the left side of building 49. And as you can see here in this 19 center part, those are the sidewalls of drums and they look 20 21 like they're intact. So we said, you know, there are drums 22 under the buildings, we are not leaving drums under the buildings, so we actually went and dug -- this thing right here 23 that you see on the top, that's the underside of the garage. 24 25 That's the garage floor that you see there. And the garage

1 floor is held up. We had our eng -- or Jacobs Engineering 2 consultants go through there and they engineered a way to keep 3 everything in place while they dug underneath.

That'll kind of give you a better scale of what's going 4 on, you know, and these little things that you see that are 5 drums, every one of them came out. Nothing was left in place. 6 And when they got them all dug out, they were all empty. So, a 7 good news story that they're all gone. Nothing in them is even 8 9 a better good news story. And then when we were all said and done, because there's no way to compact soil underneath that 10 11 thing to keep the house from moving, they used an expanding concrete that they pumped underneath the thing and it -- so we 12 had this great big hunk of concrete underneath that one 13 particular house. So it's not going anywhere. 14

15 Again, this is the area of investigation. If you see a color on here, this is where we dug. The blue that we see 16 right down in here, this is the PCB area. Right where the dot 17 is now is the main area where we had to go down to groundwater 18 to dig it all out. The rest of it was just because of where 19 the water smeared and we had to go and go after it. Now, after 20 the water smeared, we had some -- there's construction still 21 22 going on. We had some little spots here, you know, little drabs, dibs over here, and then one little place right here on 23 the side of the sound berm had PCBs in it and that was dug up 24 25 and made go away.

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So anything that we found that had PCBs in it, it's 1 gone if it was over 1; 1 part per million is the requirement by 2 state and EPA for residential housing. There is not one 1 part 3 per million anywhere on that site that -- you know, that we 4 know of. And we've looked pretty much everywhere you can 5 imagine to go look. And, again, everything that's got color to 6 it, that's where we dug. When you go compare that to the map 7 over there on the far side, that's pretty much everywhere where 8 9 we had heavy concentrations and then some. So eight acres -you know, if you guys have an appreciation for size of an acre, 10 here's eight of them that we went and dug up and at times down 11 to 18 feet. We stopped when we didn't find anything anymore, 12 and we checked, but we didn't stop until we were all done. 13

What you see down in here, this -- these were the 10 14 houses where the construction was stopped because we had the 15 PCB in the one area and we were concerned about the rest. So 16 17 after we were all done, all this stuff up here, we said, you know, we might as well go and dig out these foundations out 18 here and check underneath the foundations just to make sure 19 there was nothing under there. Good news is there was nothing 20 21 under there. That whole area that was considered the PCB 22 exclusion zone is clean based on our lab analyses. We even came over to the side of the sound berm over here. Again, it 23 was just a place that we saw a lot of metal and we made the 24 25 metal go away, and nothing extraordinary was found over here.

And we can talk about additional stuff after the thing -- after
 the briefing.

This little area here is just south of building 8. 3 As they were digging one of the drainage swails, we found all 4 sorts of diesel fuel in the soil and we tried digging out of 5 it. We were not able to completely dig out of it, so we do 6 have the diesel -- it's weathered diesel left in the soil, but 7 it's five feet below the surface of where people are walking. 8 9 So there's no way for people to come in contact with the stuff that was left behind. 10

11 Throughout this entire investigation, we have trace amounts of chemicals that exceed State of Alaska migration to 12 13 groundwater levels. And what that basically says, if you exceed this level and yet you're still below an action level, 14 that if you ever go to dig that out, you have to make sure that 15 you don't put that dirt anywhere within 100 yards of a surface 16 17 water body, a drinking water well, or a wetland. You know, so that's why we have to care about that and, again, that's 18 considered contamination left in place 19

20 What do we know? We know that we moved all sorts of 21 stuff out. We removed the drums, debris. All the 22 contamination that we found, except for some diesel fuel, was 23 put in a box or was treated or moved away from the site. It is 24 not there today. Groundwater monitoring wells: there are 93 25 groundwater monitoring wells because, as we were going through

our investigation, we said, well, you know, we don't know 1 what's here; we don't know what's there. So we would put a 2 well in, sample the soil as we went down, and sample the 3 groundwater to make sure that we had a full characterization of 4 the site and we knew what was left in place. 5 The soil samples, like I said before, we took them --6 if we found drums, if we found indications, smelly soil, 7 stained soil, anything didn't look right, we took a sample just 8

9 to make sure there was nothing left behind. The -- we have 10 some shallow groundwater contamination, which I'll talk about 11 here in a little bit, but again no one is drinking the water, 12 it is low-level stuff that we're talking about that I'll go 13 into in a little bit more detail later.

The DRO is the diesel-range organic, and that's 14 basically weathered diesel fuel, is what we're dealing with 15 there. The whole -- what we're planning to do out there with 16 putting residents back in is we've installed -- we have 17 established institutional controls. Institutional controls are 18 a means by which we are stopping people from becoming exposed 19 to contamination. The rule that basically the institutional 20 control says: you don't disturb the soil greater than six 21 22 inches without getting a dig permit and without having a work plan to make sure that you're not digging in any place that we 23 had something left behind. You're not going to be able to put 24 25 a potable water well on site to use either for drinking or for

1 irrigation. And then the other: we have to go and tell all the 2 residents all the stuff that we have done out there so that 3 they have an informed choice as to whether they want to live 4 there or not.

Living in this compound is optional. If people decide 5 they do not want to live on here based on the information that 6 they receive, they do not get dropped to the bottom of the 7 housing list that normally happens when you refuse a house 8 9 somewhere else. You get -- you stay right where you are on the list and you get the next available house. So these houses 10 were designed for three-, four-, and five-bedroom families. Ιf 11 you want one, they will be made available. If not, you get the 12 next thing available that they have down within the 13 installation. 14

15 The CERCLA actions, again, we had to -- we started this thing with an action memorandum that basically said we found 16 contamination, we did a removal, now we need to do some further 17 investigation. We established the ICs that said nobody lives 18 here until we've gone through and evaluated everything that's 19 out there; that we're also going to do monitoring the soil gas, 20 21 groundwater, and -- yeah. And then the other thing that comes 22 at the bottom, two preliminary source investigations. Before we started the remedial investigation, we basically had a 23 contractor going out and taking samples all across the area. 24 25 And in 2005, 2006, we went back through the history with a

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fine-toothed comb; we talked -- we went through all of the 1 comments and stuff that was established by the contractors. 2 Shannon & Wilson was the consultant, who is sitting right here. 3 This is the young lady that got to be there throughout the 4 entire construction as the houses were being built. She 5 documented everything. If someone said, "I had a headache from 6 standing here," we marked that down and we put that in our 7 8 investigation. "It smelled funny over here." We put that down 9 and we went and did an investigation based on that. So all the comments that we had, all the information we had was brought 10 together in the PSE I and PSE II for our beginning evaluation 11 for how to proceed with the investigation. The remedial 12 investigation starts in 2007. I told you earlier, in 2005 we 13 went and we dug the PCB soil that was on the surface. In 2007, 14 we dug the rest of it. We went down to groundwater and we took 15 it all out. So the first batch was 146 yards that was laying 16 17 on the ground. The rest of the 3300-plus came out from '07 and '08. 18

19 The other part of the investigation -- the remedial 20 investigation was a very dynamic thing, and over here to my 21 left, your right, over in the front, you'll see a chart, and 22 basically what that does, it takes -- you know, how did we 23 develop the steps? How did we know to go from point A to point 24 B? Where do we go look next? And that chart there kind of 25 describes the whole thing and we can answer questions, if you 1 have any, as you're looking at it.

After we finished doing our remedial investigation and 2 we took everything out, the contractor who was doing the human 3 health risk assessment made an assumption that was rather 4 unusual, but because of the notoriety the site had and the fact 5 that we were going to have people living here, they took every 6 site where we had found something and assumed that we found 7 everything in that one place. So of all the places that we 8 9 found something, they were all considered that we had everything there, even though it wasn't, and they calculated 10 the risk based on that. And even after they did that extreme 11 kind of calculation, there is still no unacceptable risk to 12 people living in these areas. And, again, based on the fact 13 that you're not going to drink the groundwater and you're not 14 going to dig a hole that's five feet deep in the back yard. 15

So the human health risk assessment says there is no unacceptable risk to human health or the environment, and then with -- based on that information, we proceed to say we're ready to go and start our final check to putting people in these houses.

Feasibility study basically says what do you need to do out there? And so we thought about it, we thought about it, and we said, you know, we do need to monitor the groundwater because there is some contamination left on site and we need to make sure we know what's happening with it at all times, and we need to make sure the institutional controls remain in place and are enforced and we need to meet on a regular basis, the RPMs, to go through all the information and figure out what, if anything, if there's a next step.

5 We are currently at the Proposed Plan Phase. The 6 Proposed Plan -- I have copies over here on the table if anyone 7 needs. Basically, what it says, it tells everything that we 8 did. From 2005 to current, it says this is what we did. This 9 is all the stuff that came out, this is where it went, this is 10 what's left, and we say that we're ready to put people in here.

11 Again, we have -- there's three major institutional controls. We're going to monitor -- we have sampling ports in 12 13 every single garage with the exception of 49L and basically what we do is we sampled the soil gas underneath the house. 14 We're sampling to see if there are any vapors or fumes coming 15 up, and we have found nothing that is out of the ordinary, 16 17 nothing that would pose an unreasonable risk underneath the houses. 18

We have prepared the Proposed Plan for Public Comment. When public comment period is over on the 12th, basically, everybody who made comment, all those comments get put in what's called a Responsiveness Summary; that summary gets put into the Record of Decision. And basically what it says, if there is something that is brought up by the public that needs to be addressed, it's addressed before we can go any further 1 with the RoD. Once we get everything addressed, we can move 2 the Record of Decision forward and get it signed and we can --3 we will complete the investigation process under CERCLA.

So, again, the Record of Decision goes up. The Army, EPA, and State of Alaska have to sign the document, depending on how much the final costs are for, the Record of Decision decides at what level these things get signed within each agency.

9 I told you about the soil gas sampling that we're talking about. There's a plan inside the Proposed Plan that 10 11 says for five years -- up to five years, we are going to look at the sub-slab soil gas underneath the houses and we're going 12 to monitor that to make sure that there is not something that 13 we missed. There was a concern that there were some drums left 14 underneath. We said the only way that we can check to see if 15 there's something happening after we dug and didn't find 16 anything was to go and sample the soil gas. And so that's 17 basically a picture of what it looks like. The probe gets 18 drilled into the concrete. You can see it happening here. We 19 have another picture over off on the side, and we go and --20 21 there's a whole elaborate operation as to how they go and 22 sample that. We can talk about that later if you have questions. 23

24 Okay. I'm done, or at least half-baked. So is there
25 anything that I can answer right now?

JULIE KEENER: It is true that debris remains under the structures except for four -- debris remains under some structures except for building 49?

JOSEPH MALEN: Correct. There are 12 buildings that we 4 saw debris that was still on the side wall when we did our 5 investigation, but it basically looks like, you know, bedposts 6 or tank tracks or something like that that it's junk metal. 7 And, again, junk metal has no risk. It doesn't do anything to 8 9 anybody's health. It's just there. The fact that the contractor promised that after his compaction and his 10 construction technique that the house would not move, you know, 11 that's when the Army said, okay, you can leave stuff underneath 12 the house provided it does not provide an opportunity for the 13 house to shift later on. 14

15 Sir?

16 COL. JOHNSON: Joe, when you talked about making stuff 17 go away, could you be a little more specific? Primarily, with 18 the soil that contained PCBs, you know, once that was contained 19 and identified, could you just talk about the process of what 20 you did with it?

JOSEPH MALEN: Sure. You know, the colonel is asking me to go into a little more detail on the PCB removal operation. What happens is the excavators will come out to the site and they're -- hopefully with a light misting of water, the excavators will go into the dirt, they move the dirt from the pile into a 20-yard roll-on/roll-off metal container, a giant box, and there's a liner inside the box so that you can reuse the box afterward. And you basically fill the box up, you put a seal on it after you've sampled it and then the boxes get shipped down through the haz-waste process and goes to a toxic substance disposal facility, the closest of which is in Oregon. Columbia, Oregon.

And so everything that we dug up went to Columbia, 8 9 Oregon, if you ever want to visit it. And that happened with everything that we found that had a hazardous nature. If it 10 had to go and be disposed of Outside, it went in to a 20-yard 11 roll-on/roll-off box that had a little burrito -- what we call 12 a burrito inside; they fill the box up to the weight limit of 13 the box itself, they get sampled, they get sealed and we put 14 them out under a manifest to the hazardous waste facility. And 15 then we get a piece of paper back that says it made it to the 16 facility so that there's no chance that the stuff got lost in 17 place -- you know, in transit and went somewhere else. 18

19 So we know where that stuff went to, we know that --20 everything that we moved out of there, we know where it went to 21 and we can -- we have the documentation to go and back up the 22 stuff that went Outside.

23 So, again, it's a fairly simple process. The excavator 24 comes in -- and the other thing with the excavators, the 25 contractors who do that, they put down tarps all over the place

1	so that as the bucket comes down and reaches up and you have
2	the dirt going from here to there, anything that would normally
3	drip, drips on top of the plastic and then when they're all
4	said and done, they go and wrap the plastic up and throw it in
5	the last box, and then they sample underneath the plastic to
6	make sure that nothing got through the plastic.
7	So it's a very involved process as far as the
8	contractor goes; fairly simple for me to say it. But it's a
9	very long process. It's a very serious process. And all the
10	time that the contractors are working this stuff, they're in
11	Tyvek suits with respirators, they have gloves, and the reason
12	that they do that you know, because of their career choice,
13	they come in contact with contamination on a regular basis.
14	All that is, is to make sure that there is no cumulative effect
15	of them always going out and being in contact with
16	contamination and them gotting hurt

16 contamination and them getting hurt.

17 This whole thing was done so that everybody was safe. 18 The contractors were safe, who were doing it; the people are 19 safe who are going to live there. So that's how that process 20 went.

21

COL. JOHNSON: Thank you.

22 JOSEPH MALEN: Anything else? Sir?

GENE KUHN: I'm wondering if the dirt that's been dumped out by the landfill, is that part of your project? JOSEPH MALEN: Right now? The stuff that's being

1.1	
1	dumped today or
2	GENE KUHN: Well, this summer last summer?
3	JOSEPH MALEN: No. That soil that got dumped off to
4	the side came from other construction projects on post. We
5	had I forget how many millions of dollars of construction.
6	And so basically everything that was dug out of the hole to
7	make room for foundations and what have you, had to go
8	somewhere and we decided to go and build a clean soil cell that
9	is just south of the landfill.
10	GENE KUHN: Okay. Well, that's I was wondering if I
11	should be wearing my hazmat suit out there.
12	JOSEPH MALEN: No.
13	GENE KUHN: Since that's a wood-cutting area.
14	JOSEPH MALEN: That's correct.
15	GENE KUHN: And I thank Colonel Johnson for giving us
16	that opportunity to cut wood. Thank you.
17	COL. JOHNSON: I'm not through with you. Yes, that's a
18	good point, though, because it Joe mentioned a little bit of
19	that during the brief, but deciding where anything that came
20	off of that site, a lot of time and energy goes into where does
21	it go, what's the proper disposition of it. So if it had any
22	contamination, then it went as you said, it went down south.
23	JOSEPH MALEN: Went into a box and went somewhere else.
24	COL. JOHNSON: If it had fuel in it, then it went and
25	got burned and then it got dumped in a dump. So it got treated

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1	before it got put in our landfill. And correct me if I'm
2	wrong, but none of that dirt went off the installation to a
3	landfill here in Alaska.
4	JOSEPH MALEN: That's correct.
5	COL. JOHNSON: Our it either went our landfill on
6	post or it got sent down to the Lower 48 to be treated and
7	JOSEPH MALEN: That is correct.
8	COL. JOHNSON:do whatever they do with it in
9	Oregon.
10	JOSEPH MALEN: Yep. Ma'am?
11	JULIE KEENER: Excuse me. And that soil was less than
12	10 parts per million PCB that went in or is to be used as
13	cover on Fort Wainwright landfills.
14	JOSEPH MALEN: That is correct. We did
15	JULIE KEENER: It's between 1 and 10.
16	JOSEPH MALEN: Correct. The landfill the Fort
17	Wainwright landfill allows less than 10 parts per million; it's
18	considered clean soil or how how does it go? It is not
19	contaminated soil if it's less than 10. And that's how and
20	then we asked permission from the State of Alaska because we
21	have a permit for our landfill. We said, it's less than 10
22	it's actually way less than 10 that we put it in, and we were
23	able to get permission to move a significant portion of the
24	soil there, thus saving the taxpayers a significant chunk of
25	money.
1	

1	Mr. Adams, who is sitting here at the computer, is our
2	land well, still is for the moment, our landfill manager and
3	I think he has something to add to that?
4	BRIAN ADAMS: No, I was just going to say the permit
5	for the landfill at Fort Wainwright is such that we are not
6	allowed to take contaminated soils into the landfill. So
7	there's a limit. If you that's why we had to go to the
8	state and ask the state if we could actually put that stuff
9	into the landfill. It's the same with the diesel fuel
10	contaminated soils. It gets burned. It automatically just
11	comes back to the landfill and it's used as cover material.
12	JULIE KEENER: With limited exposure.
13	BRIAN ADAMS: Correct.
14	JULIE KEENER: I mean, it's obviously not a residential
15	scenario.
16	BRIAN ADAMS: Correct.
17	JOSEPH MALEN: See, the other nice thing about the
18	stuff that was moved to the landfill, as soon as we moved the
19	soil that was not contaminated but could not be left on Taku,
20	as soon as we moved it in there, we went and took cover soil
21	and we covered that stuff back up. So there was no chance for
22	dust to be blowing off of the landfill and outside it.
23	So, again, as many precautions as we could take, the
24	installation took to make sure that everyone is safe and we
25	have a good operation throughout the installation.

Yes, ma'am? 1 JULIE KEENER: The debris that we initially removed 2 during construction, was that stockpiled somewhere and later 3 inventoried and gone through, or..... 4 JOSEPH MALEN: In 2005, the contractor that was 5 building the buildings, as they were digging up the waste 6 7 material.... JULIE KEENER: Excavation. 8 9 JOSEPH MALEN:the solid waste, the crushed drums, the tank treads, and all the other metal that they found, and 10 some wood and some other items that were found, they would 11 stockpile them in great big piles and then after they had a 12 certain sized pile, then they would load everything into a 13 truck and they would haul it out to the landfill. 14 15 Well, in 2006 as we were going through the stuff, one of the contractors that we had -- one of the environmental 16 contractors said, you know, we really need to go through this 17 metal and look for this kind of stuff, the discarded -- the 18 munitions debris. And so what we ended up having -- what we 19 ended up doing is we stopped the first contractor from hauling 20 stuff just directly to the landfill and had UXO technicians 21 22 actually go through each and every scrap pile and they pulled out anything that was considered munitions debris. 23

A couple of the items that we had, the contract folks were basically saying, hey, they never made a training device for this type of bomb or this piece of munitions, and so
everybody was treating it as this is a live real-deal thing.
As we took them to the range and we blew them up, we found out
that that was not true; they actually did make training devices
for darn near every piece of munitions that the Army used
during World War I, II, and the Korean War.

So what you see over here is what we basically found. Some of the stuff was more intact when they dug it up; others are -- you know, they're obviously dismantled now to prove that there's nothing in it. So we did have a scare at first and then when we had, you know, the second contractor come through with their UXO techs and they took it over to the range, we found out that they were actually just training devices.

14 So with the exception of the two rocket motors that had 15 the residual -- or the residue, the propellent residue, 16 everything else was inert, had no energetic piece to it. There 17 were no fuses, there were no hunks of explosive; just that 18 propellant residue is the only thing that we had to be 19 concerned about. And that was taken care of, too, at the 20 range.

21

Anything else?

JULIE KEENER: Can you give us a quick rundown of the groundwater remediations?

24 JOSEPH MALEN: Okay. Within the Proposed Plan, we talk
25 about that there are certain areas of groundwater

1 contamination. The main -- the players that we have that are 2 still -- that we are tracking is 1,2,3-trichloropropane which 3 is a solvent; trichloroethane, which is another solvent; and 4 diesel fuel. So those are the three main things that we really 5 have to track.

When we first started doing the investigation in 2006, 6 we detected elevated levels. Some of them were above the 7 clean-up levels for EPA and so we kind of focused in those 8 9 areas and we tried to make sure what was going on. We have sampled these wells in the areas of concern twice a year since 10 2006. And as we go through the years and as we're watching the 11 samples, the levels of the contaminants are going down on a --12 very significantly through what's called natural attenuation. 13 You know, we're not doing any pumping, treating, or anything 14 like that. The lab results are indicating the stuff is 15 breaking down biologically or just through the dilution process 16 of the groundwater moving through the aquifer. 17

We've made special effort to ensure that that water is 18 not moving towards the drinking water wells, the production 19 wells on Fort Wainwright. We have intercept wells or sentry 20 21 wells between Taku and the drinking water source and those wells are still coming up as absolutely clean. There's nothing 22 in them. So -- and we're going to continue monitoring, we're 23 going to continue watching, you know, because we care about, 24 25 you know, the drinking water on post.

1	JULIE KEENER: And can you point out the location of
2	source for the supply wells.
3	JOSEPH MALEN: Well, from here, let's see
4	JULIE KEENER: Or a distance and a direction.
5	JOSEPH MALEN: Well, it's in the northeast corner
6	it's outside the northeast corner of the compound. It's
7	basically behind the PX gas station.
8	JULIE KEENER: Oh, so they're right there.
9	JOSEPH MALEN: Huh?
10	JULIE KEENER: If I may? They're there.
11	JOSEPH MALEN: Right there.
12	JULIE KEENER: Right there, yes.
13	JOSEPH MALEN: Is where the drinking water protection
14	wells are. Right there.
15	JULIE KEENER: And groundwater flows?
16	JOSEPH MALEN: And groundwater flows to the northwest,
17	which is basically from here to here. North to northwest. And
18	the reason that the way that they find that out is they
19	measure the water levels across all the wells, and the water
20	you know, the high point is where the water starts, the low
21	point is where the water is going, and so what they do is they
22	take measurements to one-tenth or one-hundredth?
23	AUDIENCE MEMBER: Hundredth.
24	JOSEPH MALEN: One-hundredth of an inch to
25	JULIE KEENER: A foot.
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1	JOSEPH MALEN: Or of a foot, rather. I'm sorry.
2	You're right. One-hundredth of a foot to see which way the
3	water is moving, and it was clearly moving north/northwest.
4	More northwest than north. So and it's we're seeing that
5	evidence based on where we have the known contamination that
6	the the diesel fuel that we see here, it's actually moving
7	to the northwest. The solvents that we saw here, they were
8	moving to the northwest. The TCP that we saw that was right
9	down in here is also moving to the northwest. And we see that
10	based on, again, the water levels and which way the direction
11	the water is going. Okay? Anything else?
12	AUDIENCE MEMBER: Looks like you did a good job. No
13	one has got any questions.
14	JOSEPH MALEN: Well, thank you very much for coming, on
15	behalf of the Garrison. The Garrison commander, Garrison
16	Command Sergeant Major. Thank you very much for coming out.

Again, if you would like to make public comment, if you have a question, you can come over here to the court reporter and she can go and take your questions, comments, whatever it is that you have. I'm going to be here. We also have, you know, Mr. Adams right here, we have Mr. Gusmano to the far back over there, Ms. Caillouet over here.

23 So if you want to get the answer from the agency and 24 not from the Army, those are the two people that you go see. 25 And if there's anything that I can answer, please come and see

1	me.	Thank you very much for being here.	
2		(Off record)	
3		(END OF PROCEEDINGS)	
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	CERTIFICATE
	UNITED STATES OF AMERICA)
2) ss. STATE OF ALASKA)
	I, Elizabeth D'Amour, Notary Public in and for the
	State of Alaska, residing at Fairbanks, Alaska and court
	reporter for Liz D'Amour & Associates, do hereby certify:
	That the annexed and foregoing PROPOSED PLAN FOR
	FORMER COMMUNICATIONS SITE (TAKU GARDENS) PUBLIC MEETING, held
	in Fairbanks, Alaska at the Princess Hotel, Jade Room, 4477
	Pikes Landing Road, Fairbanks, Alaska, was digitally recorded
	and transcribed by me, pursuant to a request to do so;
	That said transcript is a true and correct
	transcription contained on said digital recording;
	That I am not a relative nor employee nor attorney nor
	counsel of any of the parties, nor am I financially interested
	in this action.
	That the original of said transcript has been retained
	by me for the purpose of filing with Sarah Belway, Project
	Manager, Jacobs, 3437 Airport Way, Suite 201, Fairbanks, Alaska
	99709.
	IN WITNESS WHEREOF, I have hereunto set my hand and
	affixed my seal this 4th day of February, 2013.
	Si not Nitron)
	Notary Public in and for the
	(S E A L) State of Alaska My Commission Expires: 12/28/2014
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DEPARTMENT OF HEALTH & HUMAN SERVICES



Public Health Service

Agency for Toxic Substances and Disease Registry Atlanta GA 30333

February 6, 2013

Mr. Joseph Malen Remedial Project Manager US Army Garrison, Fort Wainwright 1060 Gaffney Road #4500 Fort Wainwright, Alaska 99703

Dear Mr. Malen,

The Agency for Toxic Substances and Disease Registry (ATSDR) has reviewed the *Proposed Plan* for Former Communications Site (Taku Gardens) Fort Wainwright, Alaska (dated December 2012) that was issued for public comment from January 14, 2013 to February 12, 2013. We are in the process of completing a Health Consultation evaluating the potential for vapor intrusion at the proposed housing complex. We have submitted a data validation version to the Army for review. The data validation version includes a number of recommendations to protect public health of residents who will occupy the property in the summer or fall of 2013. We wish to outline these recommendations during the public comment period, so that they may be considered during finalization of the proposed plan.

ATSDR has reviewed the environmental information gathered about the site and concluded that, while the probability of a health hazard occurring from vapor intrusion is low, the lines of evidence presented do not completely eliminate the vapor intrusion pathway. Subsurface containers that could contain volatile chemicals may remain undetected beneath homes on-site. Based on the conclusions in the data validation version of the Health Consultation, our recommendations to protect the future health of families residing at Taku Gardens concentrate on two areas:

- implementing measures to prevent possible exposures to hazardous air pollutants in homes that may be constructed over containers of hazardous materials in the subsurface, and,
- (2) continued and additional precautionary sampling and monitoring of the properties.

Specifically, ATSDR recommends:

(1) that the Army consider implementing measures to prevent possible exposures to hazardous air pollutants in homes, such as installing sub-slab depressurization systems in the buildings identified as having observed and possible debris beneath them prior to occupancy as a precautionary measure. NOTE: The Proposed Post-construction Subslab Soil Gas Monitoring Program only considers installation of the system after vapor intrusion has been detected by quarterly or annual monitoring. However, the release of volatile or semi-volatile chemicals from a container could occur rapidly and migrate into homes at hazardous levels that are below olfactory detection. Subslab depressurization systems could prevent such exposures that may cause a health hazard and would likely go undetected during quarterly or annual monitoring.

Page 2 - Mr. Joseph Malen

- (2) that the following additional sampling and monitoring is conducted, including:
 - a. monitoring at appropriate intervals following any changes to the site that may affect vapor flow, such as earthquake, building renovation, construction, or landscaping. This applies to future changes as long as contamination may remain onsite above screening or background levels.
 - b. monitoring semi-volatile organic compounds and 1,2-dibromo-3-chloropropane in all monitoring plans.
 - c. performing continued sub-slab gas and indoor air monitoring of units where screening levels were exceeded (i.e. a clean round of sampling shouldn't be used to eliminate the building from future study). NOTE: This would result in sampling more units than the 12 houses selected for monitoring in the Proposed Post-construction Subslab Soil Gas Monitoring Program.
 - sampling sub-slab gas in at least three locations, as advised in ADEC guidance, for a representative number of residences to characterize the spatial variability of contaminant vapors in the sub-slab space.
 - sampling during spring for all residences to capture conditions during the spring thaw and snow melt (the dates for future sampling plans are not specified in the proposed plan).
 - f. performing at least one of the comprehensive sub-slab soil gas sampling events after construction is complete (the dates for construction completion and future sampling plans are not specified in the proposed plan).
 - g. sampling of soil-gas collocated within a representative number of utility lines and sampling within utility line access ports (manholes) to provide evidence for or against this as an active vapor migration pathway.

We hope that you will find this information useful. We appreciate the opportunity to comment on the Proposed Plan and look forward to releasing our Health Consultation in the near future. If you have any questions please contact Dr. Tonia Burk, Environmental Health Scientist, at 770-488-0764 or email at <u>TBurk d edc.gov</u>.

Sincerely,

Tina Forrester, PhD, M.S. Acting Director Division of Community Health Investigations Agency for Toxic Substances and Disease Registry

ee: Ms. Ronie Shackelford, US Army Ms. Doris Anders, US Army



DEPARTMENT OF THE ARMY INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, U.S. ARMY GARRISON FORT WAINWRIGHT 1060 GAFFNEY ROAD #6000 FORT WAINWRIGHT, ALASKA 99703-6000

Directorate of Public Works

SUBJECT: Response to ATSDR Review of Taku Gardens Proposed Plan

Dr. Tina Forrester Acting Director Division of Community Health Investigations Agency for Toxic Substances and Disease Registry 1600 Clifton Road (F-09) Atlanta, GA 30333

Dear Dr Forrester:

The U.S. Army has received your letter dated February 6, 2013 outlining ATSDR's review comments for the *Proposed Plan for Former Communications Site (Taku Gardens) Fort Wainwright, Alaska,* dated December 2012, hereinafter referred to the Proposed Plan. The comments were received within the public review period of 14 January through 12 February 2013. This letter provides official response to your comments.

The U.S. Army Garrison Fort Wainwright Alaska appreciates the time and effort ATSDR expended on this review. The ATSDR review is very clear and concise. The review comments address the entire plan with particular emphasis on two main topics: 1) implementing measures to prevent possible exposures to hazardous air pollutants in homes that may be constructed over containers of hazardous materials in the subsurface and 2) continued and additional precautionary sampling and monitoring of sub-slab soil gas.

We agree with ATSDR's statement that "the probability of a health hazard occurring from vapor intrusion is low," but take exception as to how the statement that "Subsurface containers that could contain volatile chemicals may remain undetected beneath homes on-site" is used in the context of your letter. The weight of evidence gathered during the Remedial Investigation (RI) and subsequent construction support activities suggest that if intact drums exist, they most likely contain relatively small quantities of petroleum hydrocarbons or tar. This is based on the fact that of the 1,061 mostly crushed and empty drums found during the RI and subsequent construction support activities, only eight (less than 0.5 percent) had enough liquid to allow for sampling and analysis. Liquids in the 8 drums were characterized primarily as fuel and water mixtures, with few volatile organic compounds (VOCs). None of the drums contained chlorinated VOCs, which tend to be more of a concern in terms of volatility, migration, and toxicity. The remainder of the drums with contents contained tar, asphalt, and other nonhazardous solid and semi-solid materials. The types of material found in the subsurface at this site suggest that it is unlikely any debris that might be present under any structure contains intact drums with volatile liquids. As evidenced by the predominantly empty and crushed drums, and limited volume of contaminated soil recovered from areas where the few partially filled drums were encountered, the presence of buried metal and drums does not directly correlate with chemical contamination.

The Army has conducted extensive investigations and concurrent cleanup activities between 2004 (during preliminary investigations by the Alaska District Corps of Engineers for the preconstruction assessment) and 2011. The Army, in cooperation with the U.S. Environmental Protection Agency (EPA) and the Alaska Department of Environmental Conservation (ADEC) expended considerable time and resources to ensure that every reasonable method and approach was used to delineate the nature and extent of contamination at this site. The approach taken during the investigations and removal actions has been extremely conservative; all material suspected of presenting even a possible unacceptable risk has been removed to the greatest extent practicable.

Small, isolated areas of non-petroleum contamination were excavated to the point that there was no physical evidence of contamination and then, the floors and sidewalls of the excavated areas were sampled and analyzed. If additional contamination was detected by the laboratory analyses, the excavation continued until the contaminants of potential concern were not detected or concentrations were below conservative project screening levels. The only area where subsurface contamination is present at concentrations above health-based screening levels is in the north-central portion of the site. DRO in this area was removed to the greatest extent practicable without damaging structures or utilities but, due to its highly weathered nature, remaining DRO is not expected to pose a risk to indoor air quality, future site workers or visitors.

Following completion of the RI, only five structures are suspected to have debris beneath the building foundation. To investigate the unlikely possibility that debris remaining under structures might present an unacceptable risk, the Army tasked the Corps of Engineers to execute a highly complex engineered excavation project to remove debris from beneath Building 49L. Debris was encountered between 7 and 11 feet below ground surface and extended 15 feet beneath the garage foundation. Materials removed from the excavation included 42 crushed and empty drums; 3 drums containing water with a sheen, and 3 yd³ of grease-affected soil. The excavation continued vertically and horizontally until the natural soil horizon or uncontaminated soil was reached. Results of this investigation provide additional support that metal debris at this site is not necessarily correlated with contamination.

The risk assessment was based on the location and amount of residual contamination remaining after the RI investigation. Risk calculations considered the toxicity of each contaminant, the current and potential future uses of the site, and the pathways by which people could be exposed to contaminants. The risk assessment used a highly conservative approach which calculated risk using the highest sample results of each contaminant from across the site and assumed that future residents would be regularly exposed to all of these contaminants over a 30-year period. The results indicate that, under the reasonably anticipated future use scenario, the cumulative multimedia hazard index for non-carcinogenic chemicals due to exposure to soil, vapor intrusion and use of the post water supply is 0.5, which is below EPA and ADEC threshold value of 1. Results of the cumulative excess lifetime cancer risk are within the EPA's acceptable risk of 1 in 10,000 to 1 in 100,000 and below the ADEC risk threshold of 1 in 100,000. This shows there is no unacceptable risk to residents who use the Post drinking water supply wells and do not come into contact with subsurface soil. It is important to note that potential risks due to vapor intrusion were negligible, and the primary contributors to calculated risk estimates were removed during post-RI construction support activities. Consequently, the risk estimates provided in the Proposed Plan (as taken from the risk assessment) actually overestimate risk.

The Risk Assessments and related data are available within the December 2010 Final Remedial Investigation, FWA 102, Former Communications Site, Fort Wainwright, Alaska report and the Final Feasibility Study Former Communications Site, Fort Wainwright, Alaska, July 2011 Revision. The Army also has all of the follow-on documentation and datasets available online if ATSDR would like to see them again.

The Army has carefully considered ATSDR's two major recommendations for the site: (1) measures to prevent possible exposures to hazardous air pollutants in homes that may be constructed over containers of hazardous materials in the subsurface; and (2) continued and additional precautionary sampling and monitoring. Specific responses area as follows:

Installation of sub-slab depressurization (1) was carefully considered during the Remedial Investigation/Feasibility Study (RI/FS) phase of the work, but based on the results of the RI/FS, the Army, EPA, and ADEC concluded that there is no unacceptable risk from sub-slab soil-gas and no additional remedies were necessary. Based on the results of all the investigations, there is no reason to install sub-slab depressurization units under each building duplex.

To address ATSDR's comment (2) a: the Army is statutorily required to periodically review the effectiveness of all implemented remedies. If site conditions change substantially, due to construction activities or natural disasters like earthquakes (as mentioned in the review) the Army will take appropriate action to ensure the safety of occupants in all of the housing areas on Post. Please note that construction and landscaping at this development is nearly complete. The only remaining task is installation of cable TV lines in the housing area. The installation contractor will use a special trenching tool to install these lines 3 to 4 inches below the existing surface, and the cable lines will be covered with the original surface material (i.e. gravel, concrete, or asphalt). This utility installation will not significantly alter site conditions.

In comment (2b), the ATSDR recommended that semi-volatile organic compounds (SVOCs) and 1,2-dibromo-3-chloropropane (DBCP) be added to the target analyte list. The method selected for indoor air and soil gas analysis at this site (EPA TO-15) includes analysis for DBCP. Although DBCP was detected at a low concentration in one sample collected during the October 2008 RI vapor intrusion evaluation, additional samples collected on March 9 and 10, 2009 were submitted to two different laboratories for analysis and DBCP was not detected in any of the samples. Given that this chemical was used for commercial agricultural and manufacturing purposes, it is highly unlikely that it was ever used at the Former Communications Site. Additionally, no SVOCs are present at this site above human health-based cleanup levels. The current list of analytes, and the analytical method selected for continued monitoring, was developed in consultation with the EPA and ADEC and the Army believes it is sufficient and capable of producing the necessary data to protect human health.

Comments (2)c through (2)f recommends a more aggressive sub-slab soil-gas sampling schedule than the schedule presented in the Proposed Plan. Please be assured that the current protocols and locations of the sampling ports were established in cooperation with the EPA and ADEC. The current plan will establish a post-construction baseline for the chemicals of potential concern at every unit (comment 2f), account for spatial variability (2d), account for seasonal variations (2e) and focus on the areas in close proximity to the ground water plumes, and where previous sampling results were greater than the project screening levels, but less than applicable clean-up levels. There are four sampling events scheduled in the first year, and the initial sampling event as stated in the Proposed Plan will include sample collection at (item 2 c) each of 109 residential units. Note that the void under Building 49L caused by the

investigation was completely filled with expanding concrete so sub-slab sampling at this residential unit is not possible.

The Army appreciates the fact that utility lines may sometimes provide preferential flow-paths for vapor migration (ATSDR comment [2f]), however, the Garrison believes that the current strategy to sample sub-slab vapor provides the most conservative means to assess vapor intrusion into residential units. Additional sampling of utility lines will not provide the Army with information that can be directly applied to vapor intrusion within any single residential unit. As described in detail in the RI and post-RI reports, all contaminated soil has been removed to the greatest extent practicable. Concentrations of residual volatile contaminants remaining in the subsurface between 5 and 15 feet below ground surface do not exceed human health-based cleanup levels; instead, these chemicals of concern are identified as such only because they are present at concentrations that potentially threaten groundwater quality. DRO is the only COC that remains above human health-based cleanup levels.

Again, the Army sincerely appreciates ATSDR's thoughtful and helpful review of the Proposed Plan, and the recommendations provided. Should you wish further information or clarification of Fort Wainwright's comments, please contact my POC for this effort, Mr. Joe Malen, at 907-361-4512 or email him @ joseph.s.malen@mail.mil.

Sincerely,

Clifford A. Seibel Chief, Environmental Resources Division FWA Public Works