

STATE OF ALASKA

SARAH PALIN, GOVERNOR

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM**

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File: 107.38.006

November 24, 2008

Mike Raabe
354 CES/CEVR
2258 Central Avenue, Suite 100
Eielson AFB, AK 99702-2299

Re: Third Five-Year Record of Decision Review for Eielson Air Force Base (2008)

Dear Mr. Raabe:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the 2008 Five-Year Record of Decision (ROD) Review for Eielson Air Force Base. This is the third ROD review for Eielson Air Force Base. The ADEC representatives Deborah Williams (project manager), Janice Wieggers, and Colin Craven participated in the site inspections and ROD review, in conjunction with the Air Force and the United States Environmental Protection Agency (USEPA) project manager on July 14th through the 16th, 2008.

In general ADEC concurs with the findings that the current remedies are expected to be protective of human health and the environment upon completion, and in the interim, that exposure pathways that could result in unacceptable risk are being controlled through appropriate institutional controls (ICs). However, further work is necessary to determine whether the remedies provide adequate protection at the following sites:

- The vapor intrusion pathway needs to be evaluated for all potential receptors at WP45/SS57 site along with further evaluation of the selected remedy at this site to ensure that the Remedial Action Objectives are met.
- Buried drums remaining at SS35 may still contain product that may pose a potential ecological and human health risk in the future.
- The area of buried drums identified outside of area SS37 may pose a threat of an imminent release of hazardous substances and warrants further investigation or response action.
- As stated in the 2008 Five-Year ROD Review, the overall long-term protectiveness determination for the Sitewide OU/Garrison Slough remedy will be further investigated.
- A Land Use Control Management Plan should be developed and implemented.

Each of these issues is further described below.

It is our understanding the Air Force will assess the vapor intrusion pathway at sites WP45/57. The Air Force has stated that a large number of buried drums that contained DDT, DDD and DDE located at SS35 are empty, however, because that has not been verified and to ensure long-term protectiveness at this site, the long-term monitoring should be continued. Also, because the ecological risk assessment indicated pesticide contamination may pose an unacceptable risk, the potential for ecological risk should be re-evaluated to ensure protectiveness.

Site SS37 was identified for no further action in the original ROD. However, buried asphalt tanks and drums were discovered near but outside the site boundary. The tanks and some drums were removed, however at least four drums containing unknown wastes were reburied in an excavation. During the Five-Year ROD review, ADEC requested that Eielson review the existing documentation to make sure that this area of concern/source area has been adequately evaluated. To ensure long-term protectiveness, additional investigation, long-term monitoring, or removal/remedial action are necessary at this site. DEC requests a "source evaluation" be conducted at the site in accordance with the Federal Facility Agreement.

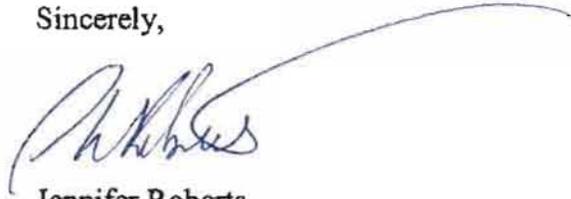
ADEC staff met with Angela Matz, Ph.D., Environmental Contaminants Program Leader with the United States Fish and Wildlife Service (USFWS) regarding the potential ecological risks from the polychlorinated biphenyls (PCBs) in Garrison Slough. Dr. Matz stated that individual PCB congeners exhibit substantial variations in their toxicological properties and in order to accurately evaluate the toxicity levels for both the ecological risks as well as human health risk from fish consumption, it is necessary to sample for the homologs and congeners of PCBs rather than the commercial mixtures, known as Aroclors. For future evaluation of the PCB contamination in Garrison Slough, soil/sediment and fish tissue should be analyzed using analytical methods for the congener and homolog PCBs so that the assessment of the toxicity is more accurate. Dr. Matz has a wealth of knowledge about PCB contamination and bioaccumulation in fish and wildlife and is available to assist Eielson AFB, ADEC and USEPA with any future assessment or remediation plans for Garrison Slough.

To ensure long-term protectiveness, a Land Use Control Management Plan should be completed describing how the Air Force has, or will, ensure land use controls/ICs are established and maintained on Eielson AFB. The plan should document the ICs applicable for each site including all No Further Action sites where residual contamination does not allow for unrestricted future land use and unlimited exposure. ADEC recommends sites that are suitable for unrestricted use be included if residual contamination is present that needs to be managed properly to ensure compliance with environmental regulations. The Land Use Control Plan should include provisions to notify ADEC if activities are scheduled that could expose people to contaminated soil or water at a site or if contaminated media is to be moved offsite. These sites will remain listed as contaminated sites under the State of Alaska Oil and Hazardous Substances Pollution Regulations (18 AAC 75) until it can be shown the soil and groundwater meet the applicable cleanup levels for all contaminants of concern and the petroleum ranges (diesel, gasoline, and residual).

ADEC appreciates the opportunity to review and comment on the 2008 Five-Year ROD review for Eielson AFB. We look forward to working with you to address the issues described above

and on the remaining restoration program work at the base. If you have any questions, please contact Deborah Williams at (907)451-5174 or John Halverson at (907)269-7545.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Roberts", with a long, sweeping horizontal line extending to the right.

Jennifer Roberts
Federal Facilities
Environmental Program Manager

cc: Deb Williams, DEC
John Halverson, DEC
Maryjane Nearman, EPA Region X