

Finding of Suitability to Transfer Environmental Suitability of Readiness Centers Eek, Alaska

Alaska Army National Guard

P.O. Box 5800

JBER, AK 99505



July 2019

FINDING OF SUITABILITY TO TRANSFER
(FOST)
Eek RC
Eek, Alaska
7 November 2018

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of the Eek Readiness Center located in Eek, Alaska for transfer from the Federal Government to an entity to be determined through the Federal Real Property Disposal Process. The Alaska Army National Guard (AKARNG) intends to terminate its license with the U.S. Army (the licensor) and thereafter the Army will transfer the Property in fee consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy.

2. PROPERTY DESCRIPTION

The Property consists of a 1.17-acre parcel of land located approximately 420 miles southwest of Anchorage and 40 miles south of Bethel, AK. The Property within the city of Eek is at the intersection of Armory and Spring Streets. The approximate center of the Property is at 60°13'07" North latitude, 162°01'45" West longitude. Attachment 1 contains a site map of the Property.

2.1 LEGAL DESCRIPTION

A parcel of land consisting of Lot 3, Block 9, of United States Survey No. 4484, dated 26 June 19755, for Eek Townsite; located in Section 31. Township 2 North, Range 73 West, Seward Meridian, Bethel Recording District, Fourth Judicial District, state of Alaska. Contains 1.17 acres, more or less.

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the Property was made through the development of an Environmental Baseline Survey (EBS) Update dated 16 August 2017 and prepared in accordance with ASTM D 6008-96 (2014). The information provided is a result of a complete search of agency files during the development of this environmental baseline survey. Additional documents relating to environmental impacts analysis and site restoration activities were consulted. NEPA analysis includes a Record of Environmental Consideration for the

Property transfer. A complete list of the relevant documents providing information on environmental conditions of the Property is attached (Attachment 2).

4. ENVIRONMENTAL CONDITION OF PROPERTY

The DOD established seven (7) Environmental Condition of Property (ECP) categories, as defined in standard ASTM D 5746 (2016), and in accordance with the policy established in Army Regulation 200-1, for the purpose of meeting the requirements of CERCLA 120h requirements during Property transactions. These seven ECP categories are defined in Attachment 2. For the subject Property, the only applicable ECP is as follows:

ECP Area Type 2: An area or parcel of real Property where only the release or disposal of petroleum products or their derivatives has occurred.

4.1 Environmental Remediation Sites

A Site Assessment (SA) conducted by Environmental Health Sciences-Alaska, Inc. in 1994 found indications of diesel range organics (DRO) present in soils to a maximum of four feet below ground surface (the depth to permafrost). A Remedial Investigation (RI) conducted by ERM-West in 1997 indicated DRO was the primary contaminate of concern in the soil. Approximately 80 cubic yards of soil on the east side of the original RC building was removed during a 2000 Interim Remedial Action (IRA), performed by Clearwater Environmental, Inc. Based on the results of the Final Remedial Action (RA) report, Alaska Department of Environmental Conservation (ADEC) determined the site had been adequately characterized and that soil contamination was no longer present in concentrations exceeding approved soil cleanup levels.

There are no known current environmental investigation/remediation sites and no evidence of groundwater contamination with the 1.17-acre transfer area.

4.2 Storage, Release or Disposal of Hazardous Substances

In accordance with 40 CFR Part 373, there is no evidence that hazardous substances were stored, released, or disposed of on the Property in excess of the reportable quantities set forth in 40 CFR Part 302.4 reportable quantities.

Petroleum substances have been stored on the Property. There has been a release or disposal of petroleum substances on the Property from a 1993 diesel fuel leak. On February 22, 1993, approximately 350-gallons of diesel fuel leaked as a result of faulty piping connected to a (now former) 3,000-gallon, single-walled fuel tank located adjacent

to the original 1960 RC building. The suspected cause was vandalism. An additional 235 gallons of fuel was reported missing from the tank. After initial cleanup efforts, approximately 150-gallons of free product remained on the frozen ground. In March and April 1993, the remaining free product was mopped up with sorbents. Subsequently, several cleanup investigations were conducted at the Property to delineate and remove contaminated soil.

4.3 Petroleum and Petroleum Products

Heating oil was stored on the Property in two 1,500-gallon double-walled aboveground storage tank (AST). One AST labeled FOT-3 is located northeast of the newer RC building and was installed in 2001. The other AST labeled FOT-2 is located between the original and the newer RC building and was installed in 1998. Both ASTs have secondary containment, remote and manual fuel-level monitoring, and overfill protection in accordance with 40 CFR § 112.7(c) and 112.8(c). A 3,000-gallon AST was formerly located adjacent to and east of the original RC building. The AST was installed in 1960 and removed in approximately 1997. The AST was permanently closed in accordance with 40 CFR § 112.2 on 9 March 2016. The tank closure included the following steps:

- Liquid was drained from the tank and connecting lines;
- Disconnection of connecting lines and piping;
- Closure and/or locking of all valves (except for ventilation valves) and fill locations;
- Labeling each tank with a sign stating that the AST is permanently closed including the date of closure

There were no former or current underground storage tanks (USTs) on the Property or adjacent too. There is no evidence of petroleum releases from a UST on any of the parcel. There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the Property.

4.4 Polychlorinated Biphenyls (PCBs)

There is no evidence that PCB-containing equipment is located on, or was previously located on the Property.

4.5 Asbestos

An asbestos survey of the Property was conducted in September 1995 and the building material samples analyzed did not detect any asbestos. However, due to the building being constructed in 1960, there is a possibility the building contains asbestos.

4.6 Lead-based Paint (LBP)

Based on the age of the building (constructed in 1960), there is a potential for LBP to be present in the original 1960 building. However, no lead-based paint survey has been performed. Due to the age of the building, the deed will include a lead-based paint warning and covenant.

4.7 Radiological Materials

There is no evidence that radioactive material or sources were stored or used on the Property.

4.8 Radon

Radon testing has not been conducted on the Property. Both of the RC buildings are elevated above the ground surface on engineered aluminum multipoint platforms and fresh air circulates freely beneath the building; the open crawl space beneath the building would preclude entrapment of radon. The EPA radon map indicates that the Bethel Census Area in western Alaska where Eek is located, is an area with predicted average indoor radon screening levels of less than 2 picocuries per liter (pCi/L). The action level for indoor radon is 4 pCi/L.

4.9 Munitions and Explosives of Concern (MEC)

Based on a review of existing records and available information, there is no evidence that Munitions and Explosives of Concern (MEC) are present on the Property. No visual, documented, or anecdotal evidence of a release of MEC was identified on the subject Property.

The term “MEC” means military munitions that may pose unique explosives safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

4.10 Other Property Conditions

There are no other hazardous conditions on the Property that present an unacceptable risk to human health and the environment.

5. ADJACENT PROPERTY CONDITIONS

There are no conditions adjacent to the Property that present an unacceptable risk to human health and the environment.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

The 2013 Record of Decision (ROD) states contaminated suprapermafrost groundwater at Eek Readiness Center has been determined not to be a drinking water source as defined by 18 AAC 75.350 and, therefore, is not subject to cleanup levels established under 18 AAC 75.345(b)(1). No remedial action is necessary to protect human health from risk associated with the petroleum-contaminated groundwater.

The 2013 ROD for the Eek Readiness Center identified diesel range organics (DRO) and residual range organics (RRO) as the contaminants of concern. The ROD established the following site-specific cleanup levels: 12,500 mg/kg for total DRO and 5,693 mg/kg for total RRO. The ROD is included in Attachment 4.

Based on the results of the Final RA report, ADEC determined the site had been adequately characterized and that soil contamination was no longer present in concentrations exceeding approved soil cleanup levels. Site closure and a Cleanup Complete Determination (Attachment 4) was granted on 26 March 2015 by the ADEC, subject to the following standard conditions.

- Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325. A “site” [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.
- Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
- This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

There are no other environmental remediation orders or agreements applicable to the property being transferred.

7. REGULATORY/PUBLIC COORDINATION

In accordance with CERCLA 120 (h)(4)(A)(iii), the AKARNG will make this FOST and the EBS available to the public. AKARNG will notify the public of this action via public notice in appropriate newspaper(s) and will make a copy of the signed FOST/EBS available for public review at Anchorage Loussac Public Library (Attachment 5).

The Alaska Department of Environmental Conservation was notified of the initiation of this FOST and a copy of regulatory comments will be included in Attachment 5. The AKARNG has consulted with the Alaska State Historic Preservation Office for this proposed transfer per the National Historic Preservation Act (NHPA).


8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The AKARNG analyzed the potential environmental impacts associated with the proposed license termination and transfer of the property in accordance with the NEPA. The results of this analysis are documented in the Record of Environmental Consideration (REC) dated 26 March 2017. There were no conditions identified in the NEPA analysis considered necessary to protect human health or the environment. The REC is included in Attachment 3.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the information above, I conclude that the property qualifies as CERCLA 120(h)(4) uncontaminated property and is transferable under that section. In addition, the AKARNG has met all Department of Defense requirements to reach a finding of suitability to transfer.

27 June 2019
Date


WILLIAM M. MYER
Colonel, U.S. Army
Chief, Installations & Environment
Army National Guard

Attachment 1: Site Map of Property

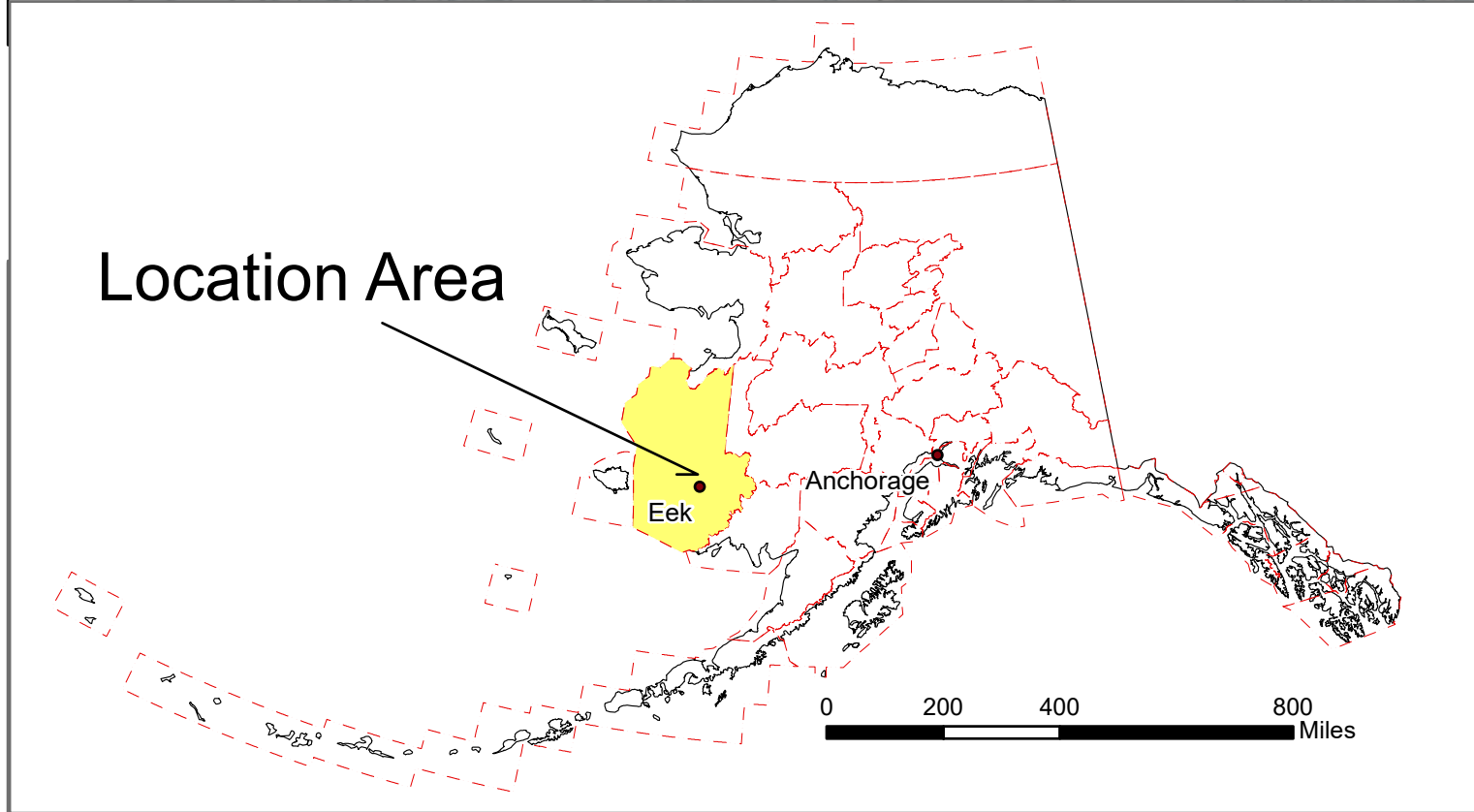
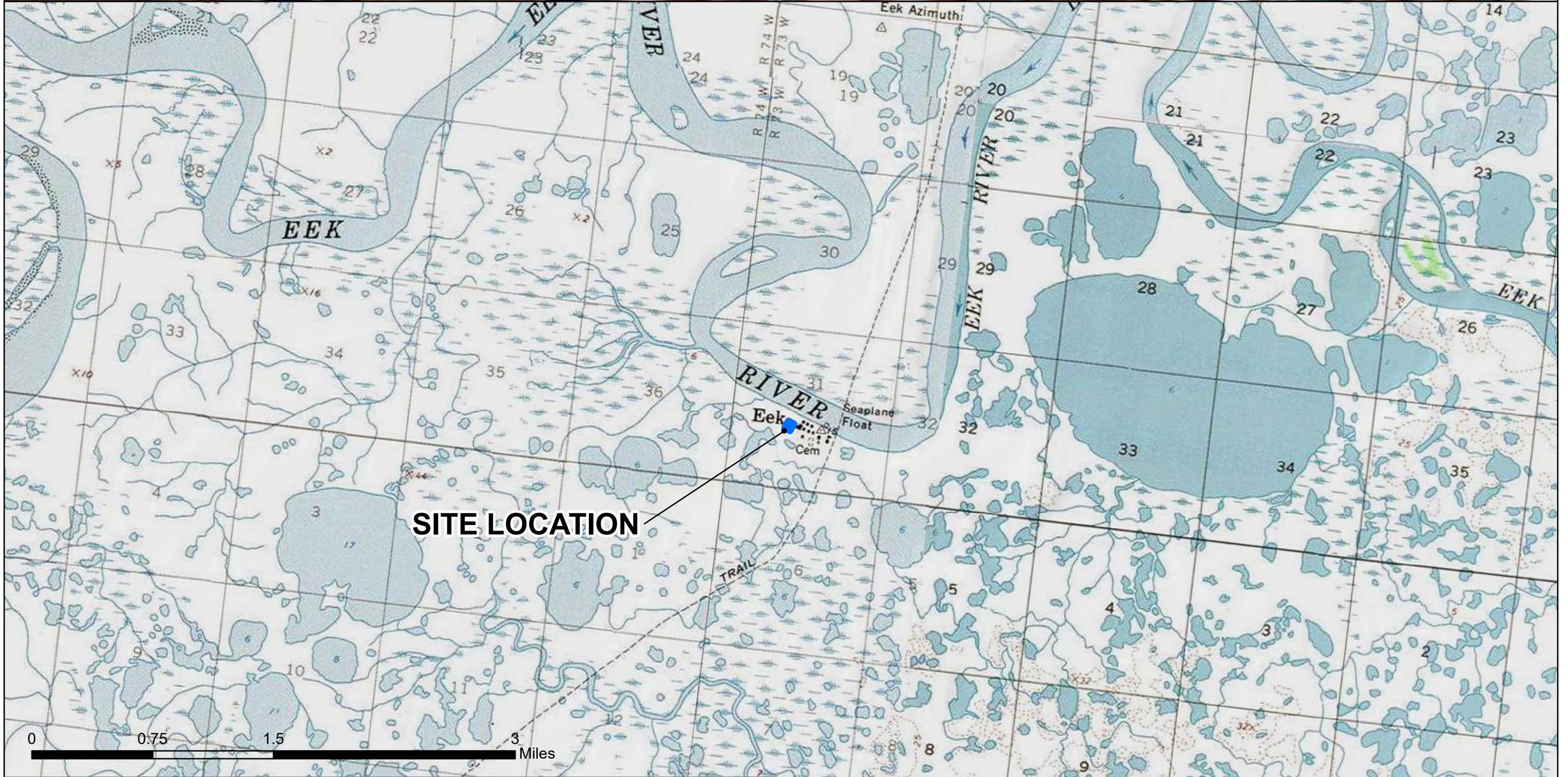
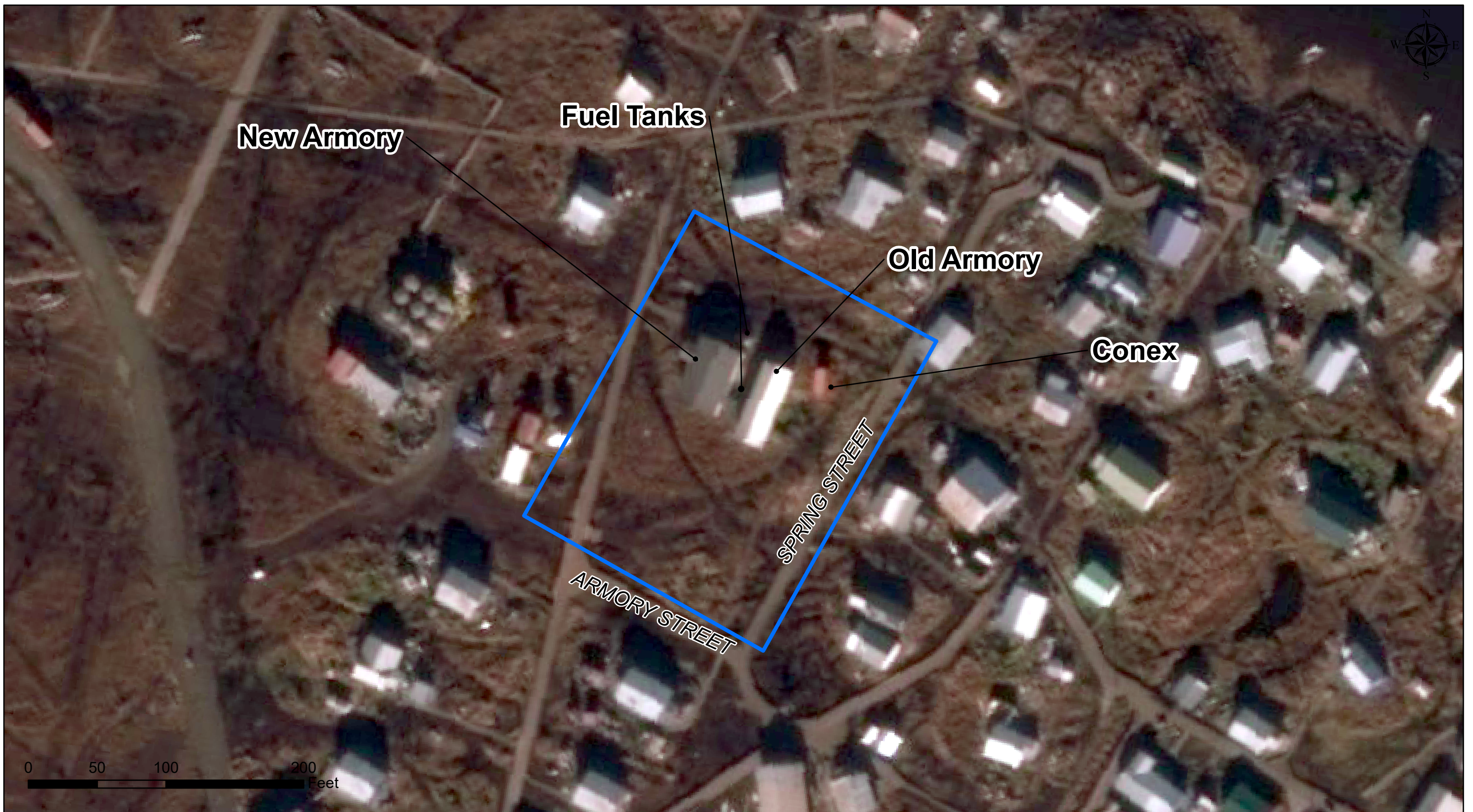


FIGURE 1 - LOCATION MAP

EEK - ALASKA
ARMY NATIONAL GUARD INSTALLATION AREA
RECORDING DISTRICT: BETHEL

PREPARED BY: AKARNG CFMO ENVIRONMENTAL GIS, 11/1/2018
MAP SOURCES: AKARNG GIS, 2015 DIGITAL GLOBE IMAGERY
PROJECTION: NAD 83 ALASKA ALBERS, LINEAR UNIT: METER



Attachment 2: Environmental Documentation

**ENVIRONMENTAL BASELINE SURVEY UPDATE
EEK READINESS CENTER
EEK, ALASKA**



Prepared on behalf of
Alaska Army National Guard

Prepared by
State of Alaska Department of Military and Veterans Affairs
Environmental Section

SITE RECONNAISSANCE DATE: 16 AUGUST 2017

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1.0 INTRODUCTION

This Environmental Baseline Survey (EBS) Update was prepared by the Environmental Section of the Alaska Department of Military and Veterans Affairs (DMVA) on behalf of the Alaska Army National Guard (AKARNG). The AKARNG seeks to terminate a lease on a 1.17-acre lot on which the Eek Readiness Center (RC) is located (henceforth referred to as the “Property”). This EBS Update was performed to identify any environmental conditions that may have materially changed since the completion of the 2015 EBS at the Property, prior to the disposal of the site. This was conducted in a manner that facilitated identification of recognized environmental conditions (RECs) (defined in paragraph 3.3.32 of American Society for Testing and Materials (ASTM) D6008-96 (2014)) at the Property through visual and physical observations and information gathering procedures.

2.0 BACKGROUND

The city of Eek is located in the Bethel Census Area of the Unorganized Borough, on the south bank of the Eek River, approximately 40 miles southwest of Bethel, Alaska. According to State of Alaska Department of Commerce, Community and Economic Development, Community and Regional Affairs section, the city of Eek has a population of approximately 353. The Property is located at the intersection of Armory and Spring Street at approximately 60°13’07” North latitude and 162°01’45” West longitude.

The Property is federally owned and was withdrawn for AKARNG use under Public Land Order 2020 on 17 September 1959 (Fairbanks Serial Number F-022953). Operations at the Eek RC began in 1960. The RC was utilized as a base of operation for AKARNG Infantry Scout troops, Detachment 1, Company B, 2/297 Infantry. The original military mission of the Scouts was to provide reconnaissance, tactical screening, and security at critical sites throughout the State of Alaska. The facility was also available for use in support of civilian search and rescue operations and as an emergency shelter. There are no active National Guard members associated with the Eek RC.

2.1 Physical Description

The Property is accessible by heading north on S. Spring Street boardwalk, past Armory Street and the Eek RC is on the east side. Access to the Property is not restricted by a fence or other barrier. The Eek RC buildings are locked when not occupied by AKARNG personnel. The original 20-foot by 60-foot RC building was constructed in 1960 and is a steel truss, wood frame Butler building. The newer 30-foot by 50-foot RC building was constructed in 2001 and is a prefabricated metal building. Both of the RC buildings are in good condition and discussed in more detail in Section 5.3.1. The buildings are connected by an open metal walkway. Both building foundations are engineered aluminum multipoint platforms. There are two permanently closed 1,500-gallon aboveground storage tanks (ASTs) and a Conex storage container owned by AKARNG located on the Property.

The following are also (partially or fully) located on the Property and are not associated with the AKARNG: wooden boardwalks, all-terrain vehicle trails, steel beams and pilings, a utilities trailer and a wooden ramp, utility poles and overhead utility lines. United Utilities, Inc. owns two buildings, a satellite dish and stand that’s partially located on the Property.

2.2 Previous EBS Findings

On February 22, 1993, approximately 350 gallons of diesel fuel leaked as a result of faulty piping connected to a (now former) 3,000-gallon, single-walled fuel oil tank located east of and adjacent to the original 1960 RC building. The suspected cause was vandalism. An additional 235 gallons of fuel was reported missing from the tank. After initial cleanup efforts, approximately 150 gallons of free product remained on the frozen ground. In March and April 1993, the remaining free product was mopped up with sorbents. Subsequently, several cleanup investigations were conducted at the Property to delineate and remove contaminated soil.

A Site Assessment (SA) conducted by Environmental Health Sciences-Alaska, Inc. in 1994 and found indications of diesel range organics (DRO) were present in soils to a maximum of four feet below ground surface (the depth to permafrost). The lateral extent was limited to a localized area surrounding the former AST, and DRO was detected at a maximum concentration of 20,000 milligrams per kilogram (mg/kg). A remedial Investigation (RI) conducted by ERM-West in 1997 indicated DRO was the primary contaminant of concern in the soil. Approximately 80 cubic yards of soil on the east side of the original RC building was removed during a 2000 Interim Remedial Action (IRA) performed by Clearwater Environmental, Inc. An additional 17 tons of soil were excavated and removed in 2014 by Ahtna. Results for confirmation samples collected at the excavation limits indicated all soil containing DRO and residual range organics (RRO) concentrations exceeding site-specific remediation standards was removed (Ahtna, 2015). Based on the results of the Final Remedial Action (RA) Report, Alaska Department of Environmental Conservation (ADEC) determined the site had been adequately characterized and that soil contamination was no longer present in concentrations exceeding approved soil cleanup levels (ADEC, 2015). Site closure was granted on 26 March 2015.

AKARNG trip reports and historical aerial photographs indicate a 3,000-gallon AST was formerly located adjacent to and east of the original RC building. The AST was installed in 1960 and removed in approximately 1997 as stated in Section 6.4.1.2 of the 2015 EBS.

In August 2015, the U.S. Army Public Health Center (Provisional) (APHC) completed site reconnaissance for the Eek EBS (No. S.0032814.2a) in accordance with ASTM D6008-96 (2014). A copy of the previous EBS is included in Appendix A. According to the 2015 EBS, APHC classified the Property as an Environmental Condition of Property (ECP) Area Type 2, an area or parcel of real property where only releases or disposal of petroleum products or their derivatives has occurred.

2.2.1 Asbestos Containing Material (ACM)

An asbestos survey of the Property was conducted September 1995. No ACM was identified in either building (Ogden, 1996).

2.2.2 Lead Based Paint (LBP) and Lead Dust

LBP is a potential hazard in residential properties constructed prior to 1978. No documented evidence of a LBP survey for the Property was identified. The original RC building was constructed in 1960; therefore, there is a potential for LBP to be present in this building.

APHC personnel collected five wipe samples for lead dust analysis at the Property during the site reconnaissance for the 2015 EBS. At that time, lead dust was not at concentrations greater than the test detection limit of 91 micrograms per square foot ($\mu\text{g}/\text{ft}^2$). Prior to 2015, the Army guideline for surface lead contamination was 200 $\mu\text{g}/\text{ft}^2$ for work areas (Departments of the Army and Air Force, 2006; Arent, 2015). Current Army National Guard guidance applicable to all federally owned and supported facilities identifies a more stringent lead dust standard of 40 $\mu\text{g}/\text{ft}^2$, based on EPA and HUD standards (Strong, 2015). Since the previous testing by APHC was not greater than the 200 $\mu\text{g}/\text{ft}^2$ limit, no further testing was conducted and it is unknown if current lead dust contamination is greater than 40 $\mu\text{g}/\text{ft}^2$. No former or current activities that could generate lead dust at the Property were identified during the 2015 EBS site reconnaissance.

In accordance with Department of Defense policy, property containing or suspected of containing non-Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) contamination (asbestos containing material (ACM), lead based paint (LBP), polychlorinated biphenyls (PCBs), radon, munitions and explosives of concern (MEC), or radionuclides) that might limit or preclude the transfer or lease of the Property for unrestricted use is designated as a qualified parcel. The 2015 EBS identified the original 1960 RC building as a qualified parcel based on the potential presence of LBP.

3.0 INTERVIEWS

3.1 Scott Karner, Master Planner

Mr. Scott Karner serves as the Master Planner for the DMVA. He participated in the site reconnaissance visit on 16 August 2017. He explained that the land is owned by the federal government and no other leases with the State, City, or other agencies are in existence for the Eek RC site. Mr. Karner did not identify any environmental issues or concerns associated with the Property.

3.2 William Anklewich, Hazardous Waste Manager

Mr. William Anklewich serves as the Hazardous Waste Manager for the DMVA. He participated in the site reconnaissance visit on 16 August 2017. During the site visit, Mr. Anklewich collected used lamps, batteries, petroleum, oil, and lubricant products, cleaners, and any other non-hazardous materials found inside the Eek RC for either use or disposal. He also photographed and visually documented the ASTs, the exterior of the Conex storage container and the areas surrounding both RC buildings. He was unable to access the Conex storage container due to it being padlocked. Mr. Anklewich noted that the RC buildings were experiencing some heaving and foundational lifting up off the ground. Mr. Anklewich did not identify any environmental issues or concerns associated with the Property.

4.0 REVIEW OF REGULATORY DATABASE INFORMATION

Electronic database searches of the ADEC and the United States Environmental Protection Agency (EPA) Envirofacts web sites were conducted in January 2018. These federal and state searches focus on identifying sites of potential environmental concern within approximate minimum search distances in accordance with ASTM D6008-96 (2014) near the Property.

4.1 ADEC Contaminated Sites Database (Search Distance = ½ Mile)

The ADEC Contaminated Sites program identifies and tracks known contaminated sites in Alaska. Three sites were listed in the Eek area and are located within ½ mile of the Property; a map showing these sites is included in Appendix B. Two of these sites were previously identified and the history of each site was reviewed for the 2015 EBS. One new site has been added to the ADEC Contaminated Sites Database. This EBS update identifies any new activity or information for the three sites within ½ mile of the Eek RC Property.

Hazard ID 1864, AKARNG Eek Federal Scout Armory (File No. 2412.38.001) – This contaminated site is located on the Property. In 1993, a release of approximately 350 gallons of diesel fuel occurred from a former 3,000-gallon fuel oil tank located east of and adjacent to the original FSRC building. This spill is previously discussed in more detail in Section 2.2. ADEC determined no further assessment or cleanup action was required and a “Cleanup Complete Determination” was issued for the site in March 2015.

Hazard ID 25493, Eek Old Bureau of Indian Affairs (BIA) School and Tanks (File No. 2412.57.001) – The Eek Old BIA School and Tanks site is located approximately 1,200 feet east-southeast of the Property. Several potential areas of concern (AOC) were identified at the site in September 2010. Three of five 10,000-gallon ASTs in the tank farm were listed. Areas of stressed vegetation were noted within and around the AST containment area, AST fill valve, former day tank locations, and areas where piping previously entered buildings. Surface staining was noted in multiple locations at the site, standing water exhibited hydrocarbon sheen, and strong hydrocarbon odors were noted in several locations of recently disturbed soil. The site is located approximately 1,000 feet south of the Eek River and is cross gradient of the Property and is not expected to pose a threat to human health or the environment on the Property.

Hazard ID 25555, Eek Lower Kuskokwim School District (LKSD) Tank Farm (File No. 2412.38.003) – The Eek LKSD Tank Farm is located approximately 1,200 feet southeast of the Property and is comprised of a single fuel tank within a containment area. In July 2010, six soil samples were collected within the containment area and were analyzed for DRO, RRO, gasoline range organics (GRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX). One sample exceeded regulatory standards with a concentration of 18,800 mg/kg of DRO. Concentrations of all analytes in all other samples were below ADEC health-based remediation standards. No further investigation has occurred at this site. The site is located approximately 100 feet south of the Eek River and is cross gradient of the Property. The site is not expected to pose a threat to human health or the environment on the Property.

4.2 ADEC Spills Database (Search Distance = On Property and Adjacent)

A query of the ADEC Division of Spill Prevention and Response Spills Database was performed in January 2018. Five spills were identified in the city of Eek; no spills were identified within the ASTM designated search distance for reported releases of petroleum products and hazardous substances (property only). None of the spills are expected to pose a threat to human health or the environment on the Property.

4.3 ADEC Underground Storage Tank (UST) Database (Search Distance = On Property and Adjacent)

A query of the ADEC UST database was performed and found no USTs registered in the city of Eek (ADEC, 2018).

4.4 EPA Envirofacts Database (Search Distance = 1 Mile)

An EPA Envirofacts database query was performed and produced only one listing (EPA, 2018). West of the city of Eek is the Alaska Village Electric Cooperative (AVEC) Eek Power Plant. It is located 200-feet west of the Property and is a fossil fuel electric power generator. A Bulk Fuel Assessment Report written by CRW Engineering Group, LLC in 2015 identified a lack of secondary containment at the AVEC Eek Power Plant and Tank Farm for each of the nine single wall steel tanks (CRW, 2015). This creates the potential for environmental concerns, but currently the AVEC Eek Power Plant does not pose a threat to human health or the environment.

4.5 Databases with No Mapped Sites

No sites were found in the search of available government records either on the Property or within the minimum search radius around the Property for the following databases:

- Proposed, Final and Deleted National Priorities List (NPL) Sites
- Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)
- Federal CERCLIS list – No Further Remedial Action Planned (NFRAP)
- Resource Conservation and Recovery Act (RCRA) – Corrective Actions
- RCRA – Treatment, Storage and Disposal Facility (TSDF)
- ADEC Solid Waste Information Management System (SWIMS)

5.0 SITE RECONNAISSANCE

Site reconnaissance was performed to characterize on-site conditions and assess surrounding property uses and natural surface features that may affect the condition of the Property. In addition, observable conditions of the surrounding roads and adjacent property were noted in order to identify obvious potential environmental conditions. Appendix C includes photographs taken during the site reconnaissance visit.

5.1 Assessor and Site Visit Date

Mr. Scott Karner, DMVA Master Planner, and Mr. William Anklewich, DMVA Hazardous Waste Program Manager, conducted the site reconnaissance visit on 16 August 2017. The site reconnaissance was conducted in a systematic manner focusing on the exterior and interior areas of the Property including the Eek RC buildings and other improvements on the Property. A visual inspection of the adjacent properties was also completed.

5.2 Site Access and Egress

The Property is accessible by heading north on S. Spring Street boardwalk, past Armory Street and the Eek RC is on the east side. There is a boardwalk leading right up to the front door of the newer RC building on the west side of the Property. The older RC building has a boardwalk access on the east side of the Property off of Armory Street boardwalk. Access to the Property is not restricted by a fence or other barriers. The RC building is locked when not occupied by AKARNG personnel.

5.3 RC Property and Adjoining Properties

The Eek RC Property is bordered by Armory Street to the south, Spring Street to the east, Willow Street to the northwest and McKinley Street to the northeast. The Eek Community Profile map indicates that surrounding properties to the north are residential buildings and to the west is Eek City Jail, Eek AVEC Power Plant and Tank Farm, and United Utilities, Inc. communications building and satellite dish (ADCCED, 2007).

Other improvements on the Property are two 1,500-gallon ASTs, permanently closed in accordance with 40 CFR 112.2, discussed in more detail in Section 5.6 and 6.1, and a Conex storage container owned by AKARNG. The Property is connected to electricity supplied by AVEC and has the potential for water and sewage service provided by the City of Eek. Power to both of the RC buildings has been turned off.

The following improvements located on the Property are not associated with the AKARNG: wooden boardwalks, two buildings and a satellite dish owned by United Utilities, Inc., and trails used by all-terrain vehicles. No evidence of a release of hazardous substances or petroleum products associated with these improvements was observed during site reconnaissance.

5.3.1 RC Buildings

There is one original 20-foot by 60-foot RC building and one newer 30-foot by 50-foot RC building located on the Property. The original 20-foot by 60-foot RC building was constructed in 1960. The newer 30-foot by 50-foot building was constructed in 2001. The buildings are connected by an open metal walkway. During the 2017 site visit, there appeared to be some heaving causing some of the buildings footings to be lifted off of the blocking.

No stained soil, stressed vegetation, or other evidence of a release of hazardous substances or petroleum products was observed in the area surrounding either of the RC buildings during the August 2017 site visit.

5.3.1.1 Original 1960 RC Building

The original 1960 RC building is a steel truss and wood-frame Butler building. The buildings foundation is an engineered aluminum multipoint platform resting on blocks. The building is in good condition and contains a main assembly room, three small office/storage rooms, and a composting toilet. Lockers, fire extinguishers, a day tank and two oil-burning heaters (Toyo and Preway) were located in the main assembly room; one office/storage room was empty, the others contained a safe, training manuals and other literature. The boardwalk and metal ramp leading up to the front entrance is in fair condition but the backdoor metal ramp appears to be leaning and off-center.

5.3.1.2 Newer 2001 RC Building

The newer 2001 RC building is a prefabricated metal building. Like the original RC building, the newer RC building has foundation consisting of an engineered aluminum multipoint platform resting on blocks. The building is in good condition and contains a main assembly room and six small office/storage rooms. Lockers, spill kits, fire extinguishers, a picnic table and two oil-burning heaters (Toyo and Preway) were located in the main assembly room; most of the smaller rooms were empty, some contained training manuals and other literature, office furniture and a day tank utility room.

5.3.2 Conex Storage Container

One Conex storage container was observed at the location northeast of the original RC building. Access could not be gained to the interior of the box and the contents inside are unknown. No evidence of a release of hazardous substances or petroleum products was observed in the area surrounding the Conex during site reconnaissance.

5.3.3 Aboveground Storage Tank (AST)

There are two 1,500-gallon ASTs owned by AKARNG on the Property. AST labeled FOT-3 is located northeast of the newer RC building and was installed in 2001. FOT-3 has been permanently closed in accordance with 40 CFR 112 effective 9 March 2016. AST labeled FOT-2 is located between the original and the newer RC building and was installed in 1998. FOT-2 has also been permanently closed in accordance with 40 CFR 112 effective 9 March 2016. AST closures are discussed in more detail in Section 6.1. Both ASTs have secondary containment, remote and manual fuel-level monitoring, and overfill protection in accordance with 40 CFR 112.7(c) and 112.8(c) (Restoration Science and Engineering, 2012).

5.3.4 Hazardous Materials Locker

No hazardous materials locker was found on the property during the 2017 site visit.

6.0 FINDINGS SINCE PREVIOUS EBS

This section documents any activities, projects, findings or investigations associated with the Property since the EBS was prepared in 2015.

6.1 AST Closures

During the site reconnaissance visit in August 2017, it was noted that both 1,500-gallon ASTs were disconnected from the building. The tanks were permanently closed in accordance with 40 CFR 112 which includes: draining the liquid from the tank and connecting lines, disconnecting of connecting lines and piping, closure and/or locking of all valves (except for ventilation valves) and fill locations and labeling the tanks with a sign stating that the AST is permanently closed with the date of closure. Review of photos taken at the site in 2017 by Mr. William Anklewich show the tank disconnected from the building.

6.2 Cultural Resources

The original RC building on the Eek property was built in 1960. Based on an evaluation of the historical significance of RCs built in the early days of the AKARNG (Perrin, et al. 2013a), and the National Register of Historic Places (NRHP) Multiple Property Documentation Form (Perrin, et al. 2013b), and consultation

between the AKARNG and the Alaska State Historic Preservation Office, it was determined that the RCs built between 1959 and 1974 would be considered eligible for listing on the NRHP. Consequently, the original Eek RC building is eligible for listing on the NRHP.

AKARNG prepared a Programmatic Agreement (dated March 15, 2017) in consultation with other parties regarding the divestiture of readiness center buildings and land throughout Alaska. The Programmatic Agreement provides for the mitigation of impacts to existing and potential historic properties.

7.0 CONCLUSIONS

This EBS Update has been performed in accordance with US Army Regulation (AR) 200-1 and applicable ASTM standards. Under ASTM D6008-96 (2014), the following components were completed: interviews, government records reviews, visual inspection of the Property and adjoining properties, and the declaration by the environmental professional responsible for the assessment.

This EBS Update report did not identify any current RECs at the Property. The previous EBS (August 2015) classified the Property as an ECP Area Type 2, an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred. Based on the review of state and federal databases, site reconnaissance and interviews with persons knowledgeable of the Property, the assessment for the ECP category type remains as ECP Area Type 2.

8.0 REFERENCES

ADCCED, 2007. Alaska Department of Commerce, Community, and Economic Development, Division of Community and Regional Affairs, Community Profile Map for Eek, available online at: <http://dcced.maps.arcgis.com/home/index.html> , accessed January 2018.

ADEC, 2018. Alaska Department of Environmental Conservation, Division of Spill Prevention and Response, Spills Database, available online at: <http://dec.alaska.gov/spar/PPR/data.htm>, accessed January 2018.

ADEC, 2018. Alaska Department of Environmental Conservation, Division of Spill Prevention and Response, Contaminated Site Database, available online at: <http://dec.alaska.gov/spar/csp.aspx>, accessed January 2018.

ASTM, 2014. ASTM D6008-96 (2014), Standard Practice for Conducting Environmental Baseline Surveys.

CRW Engineering Group, LLC, 2015. Alaska Bulk Fuel Inventory Map, Bulk Fuel Assessment Report Eek, Alaska, Prepared for: Alaska Energy Authority, Prepared by: CRW Engineering Group, LLC, April 2015, available online at: <http://dcced.maps.arcgis.com/home/index.html>, accessed February 2018.

Departments of the Army and Air Force, 2006. NG Pam 420-15, Facilities Engineering, Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges, 3 November 2006.

EPA, 2018. EPA EnviroMapper for Envirofacts, search place: Eek, Alaska, available online at: <http://ww3.epa.gov/enviro/>, accessed January 2018.

Ogden, 1996. Asbestos Survey Report at Eek Federal Scout Armory, Eek, Alaska, Prepared for: Alaska Army National Guard, Prepared by: Ogden Environmental and Energy Services Co., Inc., April 1996.

Perrin, Natalie, et al., 2013a. Historical Properties Determinations for Alaska Army National Guard Federal Scout Readiness Centers. Prepared for: Alaska Army National Guard, JBER, Alaska. Prepared by: NHG Alaska, LLC, Anchorage.

Perrin, Natalie, et al., 2013b. National Register of Historic Places Multiple Property Documentation Form for Alaska Federal Scout Readiness Centers, 1959-1974. Prepared for: Alaska Army National Guard, JBER, Alaska. Prepared by: NHG Alaska, LLC, Anchorage.

Strong, M.C., 2015. Memorandum from Colonel Mark C. Strong, Chief of Staff, Army National Guard to the Chiefs of Staff of All States, Puerto Rico, the US Virgin Islands, Guam, and the District of Columbia. Subject: Possible Lead Dust Hazard in Army National Guard (ARNG) Readiness Centers, 23 September 2015.

9.0 DECLARATION OF ENVIRONMENTAL PROFESSIONAL

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 40 CFR §312.10 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

PREPARED BY:



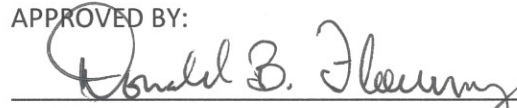
PATRICK GEARY, ECOP Program Manager
AKARNG Environmental Section

REVIEWED BY:



JENNIFER STRAUSE, Environmental Team Lead
AKARNG Environmental Section

APPROVED BY:



DONALD FLOURNOY, Environmental Program Manager
AKARNG Environmental Section

Environmental Condition of Property Classifications

ENVIRONMENTAL CONDITION OF PROPERTY

Environmental Condition of Property (ECOP) categories developed under BRAC by the DoD are assigned to FOST Parcels. The classifications are assigned both on the basis of the type of chemical releases (hazardous substances or petroleum) found at the properties and the status of the properties' cleanup activities. These ECOP categories include the following ECP (DoD 1996a):

- ECOP 1 Areas where no release or disposal of hazardous substances or petroleum products has occurred (including migration from adjacent areas).
- ECOP 2 Areas where only the release or disposal of petroleum products has occurred.
- ECOP 3 Areas where release, disposal, or migration of hazardous substances has occurred, but at concentrations that do not require removal or remedial response.
- ECOP 4 Areas where release, disposal, or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.
- ECOP 5 Areas where release, disposal, or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.
- ECOP 6 Areas where release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not yet been implemented.
- ECOP 7 Areas that are not yet evaluated or require additional evaluation.

Individual sites with ECOP Classifications of 1, 2, 3, or 4 are designated as being currently suitable for transfer or lease.

Those with ECOP Classifications of 5, 6, or 7 are not currently suitable for transfer, but may be suitable for lease.

REFERENCES:

Department of Defense (1996). Clarification of "Uncontaminated" Environmental Condition of Property at Base Realignment and Closure Installations.

American Society for Testing and Materials Standard D5746-98 (Revised 2016), Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities.

Attachment 3: Record of Environmental Consideration

Enviro Tracking #:	ARNG ENVIRONMENTAL CHECKLIST		State ARNG
	Enter information in the yellow shaded areas.		AKARNG
PART A - PROJECT INFORMATION			
1. PROJECT NAME: Eek FSRC Disposal			
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED: 4/26/17	
4. DESCRIPTION AND LOCATION OF THE PROJECT/PROPOSED ACTION:			
a. Location (Include a detailed map, if applicable):			
<p>The Eek Federal Scout Readiness Center (FSRC) is located on <u>1.17</u> ^{MH 5/11/18} 1.15 acres in the city of Eek in western Alaska, 420 miles southwest of Anchorage and 40 miles south of Bethel.</p>			
b. Description:			
<p>The property consists of one 1,200 square-foot (SF) FSRC building constructed in 1960, one 1,615 SF FSRC building constructed in 2001, and two 1,500-gallon above ground fuel storage tanks. The Federally-owned property was withdrawn for AKARNG use under PLO 2020 in 1959. The Proposed Action is to dispose of the site.</p>			
c. The proposed action will involve (check all that apply):			
<input type="checkbox"/> Training activities/areas <input type="checkbox"/> Construction <input type="checkbox"/> Natural resource management <input type="checkbox"/> Maintenance/repair/rehabilitation <input checked="" type="checkbox"/> Real estate action <input type="checkbox"/> Environmental plans/surveys <input type="checkbox"/> Innovative readiness training project <input type="checkbox"/> Other (Explain): <u>1.17 MH 5/11/18</u>			
d. Project size (acres):		Acres of new surface disturbance (proposed):	
(if applicable) <u>1.15</u>		(if applicable) <u>NA</u>	
5. START DATE of PROPOSED ACTION (dd-mmm-yy):		FY2018 Note: This must be a future date.	
6. PROGRAMMED FISCAL YEAR (if applicable):			
7. END DATE (if applicable):			
PART B - DECISION ANALYSIS GUIDE			
<p>To use a categorical exclusion, the project must satisfy the following three screening criteria: no segmentation, no exceptional circumstances and a qualifying categorical exclusion that covers the project. The following decision tree will guide the application and documentation of these three screening criteria. The criteria were extracted from 32 CFR Section 651.29 and represent the most common screening conditions experienced in the ARNG. NOTE: Each question in Part B must have an applicable block checked for concurrence with REC.</p>			
1. Is this action segmented (the scope of the action must include the consideration of connected, cumulative, and similar actions)?			
<input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #2)			
2. Is there reasonable likelihood of significant environmental effects (direct, indirect, and cumulative)? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.			
<input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #3)			
3. Is there a reasonable likelihood of significant effects on public health, safety or the environment? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.			
<input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #4)			
4. Is there an imposition of uncertain or unique environmental risks? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.			
<input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #5)			
5. Is the project of greater scope or size than is normal for the category of action? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.			
<input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #6)			
6. Does the project introduce or employ unproven technology? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.			
<input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #7)			

PART B - DECISION ANALYSIS (continued)

7. Will there be reportable releases of hazardous or toxic substances as specified in 40 CFR Part 302? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☒ NO (go to #8)

8. If proposed action is in a non-attainment or maintenance area, will air emissions exceed de minimus levels or otherwise require a formal Clean Air Act (CAA) conformity determination? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☐ NO (go to #9) ☒ NA (go to #9)

9. Will the project have effects on the quality of the environment that are likely to be highly controversial? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☒ NO (go to #10)

10. Will the project establish a precedent (or make decisions in principle) for future or subsequent actions that are reasonably likely to have future significant effects? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☒ NO (go to #11)

11. Has federal funding been secured for the Innovative Readiness Training (IRT) project?

☒ N/A (go to #13) ☐ YES (go to #13) ☐ NO (go to #12)

12. NOTE: IRT projects not currently funded can secure approved NEPA documentation. However, once funding is secured State ARNG is required to coordinate with ARNG-ILE-T to complete natural and cultural surveys via proponent funding.

☐ CONFIRMED (go to #27)

13. Do you have a species list from the U.S. Fish and Wildlife Service that is less than 90 days old?

☒ YES (go to #14) Date of List: 6/5/17 ☐ NO (update species list return to #13)

14. In reviewing the species list, what determination was made by the State ARNG?

☒ No species present (go to #16)

☐ No affect (go to #16)

☐ May affect but not likely to adversely affect (go to #15)

☐ May affect likely to adversely affect (go to #15)

Date of USFWS concurrence:

15. Does an existing Biological Opinion cover the action?

☐ YES (go to #16) Date of BO: ☒ NO (go to #30)

16. Have the Endangered Species Act, Section 7 requirements completed?

☒ YES (go to #17) Date of Documentation: 4/24/17 ☐ NO (complete documentation, return to #16)

17. Does the project involve an undertaking to a building or structure that is 50 years of age or older?

☒ YES (go to #18) ☐ NO (go to #20)

18. Has the building or structure been surveyed for the National Register of Historic Places?

☒ YES (go to #19) ☐ NO (complete inventory, return to #18)

19. Is the building or structure eligible for or listed on the National Register of Historic Places?

☒ YES (go to #20) ☐ NO (go to #20)

20. Does the action involve ground disturbing activities?

☒ YES (go to #21) ☐ NO (go to #22)

21. Has an archaeological inventory or research been completed to determine if there are any archeological resources present?

☒ YES (go to #22) ☐ NO (complete inventory or conduct research, return to #21)

22. In reviewing the undertaking, under the National Historic Preservation Act (NHPA) (for both above and below ground resources), what determination was made by the State ARNG?

☐ No 106 undertaking; no additional consultation required under NHPA (go to question #27)

☐ No properties affected (go to #24)

☐ No adverse effect (go to #24)

☒ Adverse effect (go to #23)

Date of SHPO Concurrence:

Date of SHPO Concurrence:

23. Has the State ARNG addressed the adverse effect?

☒ YES (place date of MOA or existing PA and explanation of mitigation in box below, go to #24) ☐ NO (go to #30)

23a. Programmatic Agreement signed on 3/15/2017. Mitigative measures are in place for the buildings (poster and contextual history book) and land (protocols for eroding cemeteries at remote rural villages like Eek).

PART B - DECISION ANALYSIS (continued)

24. Per DoDI 4710.02 did the state ARNG determine that tribal consultation was necessary for this project?

☒ YES (go to #25)☐ NO (Provide reason in this block 24a, go to #27)

24a.

25. Did the Tribes express an interest or respond with concerns about the project?

☐ YES (go to #26)☒ NO (go to #27)

Date of Documentation: 4/6/2015 (see attached MFR)

26. Has the State ARNG addressed the Tribal concerns?

☐ YES (place date of MOU or explanation of how State ARNG addressed tribal concerns in box below, go to #27)☐ NO (address concerns, return to #26)

Complete only if additional documentation is required in question #26

26a.

27. Does the project involve an unresolved effect on areas having special designation or recognition such as those listed below? For any yes responses go to #30 otherwise go to #28. If any No response is a result of negotiated and/or previously resolved effects please describe resolution in box 27a below.

TYPE	Unresolved Effects?	TYPE	Unresolved Effects?
a. Prime/Unique Farmland	no	e. Wild/Scenic River	no
b. Wilderness Area/National Park	no	f. Coastal Zones	no
c. Sole-Source Aquifer	no	g. 100-year Floodplains	no
d. Wetlands	no	h. National Wildlife Refuges	no

27a. According to the U.S. Fish and Wildlife Service National Wetlands Inventory wetlands mapper, the city of Eek lies within a freshwater emergent wetland (designation PEM1/SS1B). Because the proposed action is a real estate action, it is not anticipated to have an impact on any wetlands. The Eek FSRC is located within the Yukon Delta National Wildlife Refuge. The proposed action is not anticipated to have an impact on wildlife that may be in the area.

28. Is this project addressed in a separate EA or EIS review?

☐ YES (complete table below; go to Part C, Determination)☒ NO (go to #29)

Document Title:

Lead Agency:

Date of Decision Document:

29. Does the project meet at least one of the categorical exclusions listed in 32 CFR 651 App B?

☒ YES (complete table below; go to Part C, Determination)☐ NO (go to #30)

List primary CAT EX code

F-6: Disposal of real property (including facilities) by the Army where...

Describe why CAT EX applies

The Proposed Action is disposal of real property.

30. At this time your project has not met all the qualifications for using a categorical exclusion under 32 CFR 651. Unless the scope of the project is changed, it will require an Environmental Assessment or possibly an Environmental Impact Statement. If you feel this is in error, please call your NEPA Regional Manager to discuss. If needed, go to Part C Determination.

Additional Information (if needed):

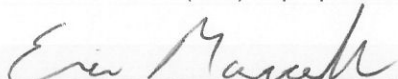
Attachments:

1. Location map
2. USFWS Alaska species list
3. ESA Section 7 compliance MFR
4. NWI wetlands map
5. Tribal consultation documentation

PART C - DETERMINATION

On the basis of this initial evaluation, the following is appropriate:

- ☐ IAW 32 CFR 651 Appendix B, the proposed action qualifies for a Categorical Exclusion (CX) that does not require a Record of Environmental Consideration.
- ☒ A Record of Environmental Consideration (REC).
- ☐ An Environmental Assessment (EA).
- ☐ A Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).



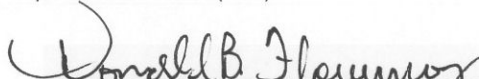
Signature of Proponent (Requester)

LTC Eric Marcellus, AKARNG

Printed Name of Proponent (Requester)

3 MAY 17

Date Signed



Environmental Program Manager

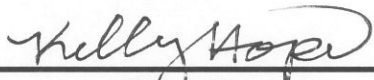
Mr. Donald Flournoy, AKDMVA

Printed Name of Env. Program Manager

28 April 2017

Date Signed

Other concurrence (as needed):



Signature

Ms. Kelly Hope, NEPA Program Manager, AKDMVA

Printed Name

4/26/17

Date Signed

Signature

Printed Name

Date Signed

Signature

Printed Name

Date Signed

Signature

Printed Name

Date Signed

Signature

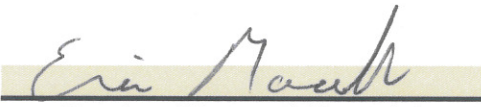
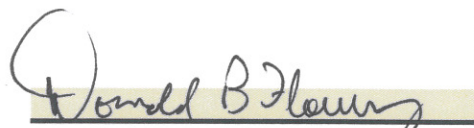
Printed Name

Date Signed

Signature

Printed Name

Date Signed

Enviro Tracking #:	ARNG Record of Environmental Consideration		State ARNG
Enter information in the yellow shaded areas.			
1. PROJECT NAME: Eek FSRC Disposal			
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED: 4/26/17	
4. START DATE of PROPOSED ACTION (dd-mmm-yy):		FY 2018	Note: This must be a future date
5. PROGRAMMED FISCAL YEAR: FY2018			
6. END DATE (if applicable):			
7. DESCRIPTION AND LOCATION OF THE PROPOSED ACTION:			
a. Location (Include a detailed map, if applicable): 1.17 MH 5/11/18 The Eek Federal Scout Readiness Center (FSRC) is located on 1.15 acres in the city of Eek in western Alaska, 420 miles southwest of Anchorage and 40 miles south of Bethel.			
b. Description: The property consists of one 1,200 square-foot (SF) FSRC building constructed in 1960, one 1,615 SF FSRC building constructed in 2001, and two 1,500-gallon above ground fuel storage tanks. The Proposed Action is to dispose of the site.			
8. CHOOSE ONE OF THE FOLLOWING:			
<input type="checkbox"/> An existing environmental assessment* adequately covers the scope of this project. Attach FNSI if EA was completed by another federal agency (non-ARNG). EA Date (dd-mmm-yy): Lead Agency:			
<input type="checkbox"/> An existing environmental impact statement* adequately covers the scope of this project. EIS Date (dd-mmm-yy): Lead Agency:			
<input checked="" type="checkbox"/> After reviewing the screening criteria and completing the ARNG environmental checklist, this project qualifies for a Categorical Exclusion Code: F-6: Disposal of real property (including facilities) by the Army wh See 32 CFR 651 App. B Categorical Exclusion Code: See 32 CFR 651 App. B Categorical Exclusion Code: See 32 CFR 651 App. B			
<input type="checkbox"/> This project is exempt from NEPA requirements under the provisions of: Cite superseding law:			
*Copies of the referenced EA or EIS can be found in the ARNG Environmental Office within each state.			
9. REMARKS:			
 Signature of Proponent (Requester) LTC Eric Marcellus, AKARNG Printed Name of Proponent (Requester) 3 MAY 17 Date Signed		 Environmental Program Manager Mr. Donald Flournoy, AKDMVA Printed Name of Env. Program Manager 28 April 2017 Date Signed	
Proponent Information:			
10. Proponent: LTC Eric Marcellus			
11. Address: P.O. Box 5800, JBER, AK 99505			
12. POC: LTC Eric Marcellus			
13. Comm. Voice:			
14. Proponent POC e-mail: eric.l.marcellus.mil@mail.mil			

**Attachment 4: Record of Decision (ROD) and
Cleanup Complete Determination**

2412.38.001

ADEC File No.

1 Site Name and Location

Facility name: Eek Federal Scout Readiness Center (FSRC), Alaska

ADEC hazard ID: 1864

ADEC file number: 2412.38.001

AEDB-R number: CCAK0090931

ALASKA DEPARTMENT OF ENVIRONMENTAL
CONSERVATION

MAY 31 2013

Hazard ID No.

RECEIVED

Site location: Eek FSRC is within the City of Eek, approximately 600 feet south of the Eek River (Figure 1). (Figures are at the end of this Record of Decision).

The FSRC is located on a parcel of land that was withdrawn for Alaska Army National Guard (ARNG) use under Public Land Order 2020 on September 17, 1959. The parcel is described as Lot 3, Block 9, Tract A, of U.S. Survey 4484; dated June 26, 1975; for Eek Townsite, containing 1.17 acres, more or less; located in Section 31 of Township 2 North, Range 73 West, Seward Meridian, Bethel Recording District, Fourth Judicial District, State of Alaska. The City of Eek lies on the south bank of the Eek River, approximately 12 miles east of the mouth of the Kuskokwim River. Eek is 35 air miles south of Bethel in the Yukon-Kuskokwim Delta and 420 miles west of Anchorage.

Latitude and longitude: 60.218890 degrees north, -162.024440 degrees west, based on the 1984 (revised 2004) World Geodetic System (WGS 84) datum.

Facility owner and point of contact: The facility owner is ARNG, and the point of contact is Lieutenant Colonel Joel Gilbert, CFMO/Environmental, Building 57024, Joint Base Elmendorf-Richardson, Alaska, 99505.

2 Contaminants of Concern and Affected Media

Historical practices have resulted in release of petroleum hydrocarbons to soil and groundwater at Eek FSRC, and the affected areas have been investigated. Based on results of sampling conducted during investigations, the following contaminants of concern and affected media have been identified.

Soil: Diesel-range organics (DRO) was detected at concentrations greater than Alaska Department of Environmental Conservation (ADEC) Method 2 cleanup levels for the ingestion pathway (Table B2 of Title 18, Chapter 75, Section 75.341[d], of the *Alaska Administrative Code* [AAC]) in surface and subsurface soil to approximately 3 feet below ground surface.

Groundwater: Concentrations of DRO detected in onsite suprapermafrost groundwater were greater than ADEC cleanup levels (Table C of 18 AAC 75.345[b][1]).

The maximum reported onsite contaminant concentrations by medium type are presented in Table 1. On the basis of the results of a cumulative risk assessment (CH2M HILL, 2013), it has been concluded that, under current conditions, petroleum-contaminated soil and groundwater at Eek FSRC pose unacceptable risk to human health (however, as explained in Section 5, groundwater ingestion is considered an incomplete exposure pathway).

3 Regulatory Authority

The agency with regulatory authority (ADEC) is identified in applicable State of Alaska regulations as promulgated in the Oil and Hazardous Substance Pollution Control Act, 18 AAC 75, Article 3 (April 8, 2012, Revision).

4 Relevant Guidance and Policy

The following ADEC guidance documents are relevant to this Record of Decision: *Policy Guidance to Developing Conceptual Site Models* (2010), *Cumulative Risk Guidance* (2008), *Ecoscoping Guidance* (2012), *Guidance on Using Institutional Controls in Oil and Other Hazardous Substances Cleanups* (2011a), *Implementing Guidance for the Method 3 Hydrocarbon Risk Calculator* (2011b), and *Site Closure Memorandum* (2009).

TABLE 1
Summary of Contaminant Concentrations by Medium
Eek Federal Scout Readiness Center

Chemical of Concern	Maximum Concentration	Sample Depth (feet bgs)
Soil		
Diesel-range organics	50,700 mg/kg	0.6
Groundwater		
Diesel-range organics	5.74 mg/L	NA

bgs = below ground surface
mg/kg = milligrams per kilogram
mg/L = milligrams per liter
NA = not applicable

5 Confirmed Routes of Exposure

The conceptual model for exposure at Eek FSRC (Figure 2) was developed in accordance with ADEC guidance (2010). Potentially affected media are primarily surface and subsurface soil. The model takes into account past and current sources of contamination, chemical release mechanisms, transport/exposure media, potential exposure points, potential exposure routes, and potential receptors. The assessed routes of exposure are as follows:

- Surface soil ingestion and direct contact pathways are considered complete under current and reasonably expected future conditions.
- Direct contact and ingestion of subsurface soil pathways are considered complete under current and reasonably expected future conditions.
- Ingestion and direct contact with surface water on the property is not considered a significant potential exposure pathway because the surface water is typically seasonal in nature and surface water is not likely to be used as a drinking water source.
- Outdoor and indoor inhalation pathways are considered complete for the purposes of this model; however, potential exposure through outdoor inhalation is limited because volatile chemicals are diffused and diluted in the breathing zone, and potential exposure through indoor inhalation is not considered significant because all buildings are constructed on floating (elevated) foundations, generally limiting the pathway.
- All potentially complete ecological exposure pathways are considered insignificant because the compounds of concern for bioaccumulation are not present and because of the small size of the site (ADEC, 2012), the location of the site within the City of Eek, and the presence of more optimal habitat nearby.
- Ingestion of groundwater is not considered a complete pathway as the suprapermafrost groundwater encountered onsite is not considered a drinking water source because the following conditions are met (18 AAC 75.350):
 - Groundwater is not used for a public or private drinking water system.
 - Groundwater is not used within the zone of contribution of an active public or private drinking water system.
 - Groundwater is not within a recharge area for a public or private drinking water well, a wellhead protection area, or a sole-source aquifer.
 - Groundwater is not a reasonably expected potential future source of drinking water, based on the evaluation of:

- The limited availability of the groundwater, shallow depth to groundwater, and the presence of a continuous permafrost
- The quality of the water, which has high mineral content and turbidity and is susceptible to contamination from multiple point and non-point sources
- The existence of a preferred alternative source of drinking water
- Groundwater is not expected to be transported or to act as a transport mechanism for hazardous substances to a current or potential future source of drinking water.

6 Basis for Action

On the basis of findings of the cumulative risk assessment (CH2M HILL, 2013), it has been determined that, under current conditions, soil contaminated with DRO and residual-range organics (RRO) at Eek FSRC poses unacceptable risk to human health. Remedial actions are necessary to protect human health from the risk associated with potential ingestion of the petroleum-contaminated soil.

The contaminated suprapermafrost groundwater at Eek FSRC has been determined not to be a drinking water source as defined by 18 AAC 75.350 and, therefore, is not subject to cleanup levels established under 18 AAC 75.345(b)(1). No remedial action is necessary to protect human health from risk associated with the petroleum-contaminated groundwater.

7 Site-specific Cleanup Levels

As stated in 18 AAC 75.340(d), for each affected site, a responsible person shall propose soil cleanup levels for hazardous substances in soil for ADEC approval. The proposed soil cleanup levels must be based upon an estimate of the reasonable maximum exposure expected to occur under current and future site conditions and must be developed using one or more of the following methods:

- ADEC Method 1 for petroleum hydrocarbon-contaminated soil in a non-Arctic zone, as set out in Table A1 of 18 AAC 75.341(a), or in an Arctic zone, as set out in Table A2 of 18 AAC 75.341(b)
- ADEC Method 2 for soil contaminated with chemicals other than petroleum hydrocarbons, as set out in Table B1 of 18 AAC 75.341(c), or with petroleum hydrocarbons, as set out in Table B2 of 18 AAC 75.341(d)
- ADEC Method 3, for developing site-specific alternative cleanup levels (ACLs)

For each contaminant detected in soil at a concentration above its ADEC cleanup level, the respective cleanup level provided under Method 1 or 2 applies at a contaminated site unless ADEC approves an ACL that has been proposed under Method 3.

For soil contaminated with petroleum hydrocarbons, cleanup levels for total petroleum hydrocarbon ranges were initially obtained from Table B2 of 18 AAC 75.341(d). However, site specific aliphatic DRO and aromatic DRO fractions were used to determine the final cleanup levels using the Washington State EPH/VPH Methods rather than AK102AA. Site specific cleanup levels are presented in *Eek Federal Scout Readiness Center Data Gap Investigation Report* (CH2M HILL, 2013), which has been approved by ADEC (ADEC, 2013). Table 2 summarizes the Method 2 cleanup levels for Eek FSRC that are deemed protective of human health.

The groundwater cleanup levels provided in 18 AAC 75.345(b), Table C, are associated with groundwater that is considered a current or a reasonably expected potential future source of drinking water or groundwater that acts as a transport mechanism for hazardous substance migration. The active-zone, suprapermafrost groundwater at Eek FSRC does not satisfy these requirements. Therefore, the groundwater cleanup levels provided in 18 AAC 75.345(b), Table C, do not apply to Eek FSRC.

TABLE 2
Site-specific Soil Cleanup Levels
Eek Federal Scout Readiness Center

Contaminant	Maximum Reported Soil Concentration	ADEC Method 2	ADEC Method 2	Approved Site-specific Cleanup Level
		Table B2 Soil Ingestion Cleanup Level ^b	Site-specific Soil Ingestion Cleanup Level ^c	
Residual-range organics				
Aliphatic (47.30%)	--	20,000	--	20,000
Aromatic (52.70%)	--	3,000	--	3,000
Total	8,200	10,000	5,693	5,693
Diesel-range organics				
Aliphatic (78.55%)	--	10,000	--	10,000
Aromatic (21.45%)	--	4,100	--	4,100
Total	50,700	10,250	12,730	12,500 ^d

Note: All values are in milligrams per kilogram.

^aMethod 2 cleanup levels obtained from 18 AAC 75.341(c), Table B1, under-40-inch zone

^bMethod 2 cleanup levels obtained from 18 AAC 75.341(d), Table B2, under-40-inch zone

^cMethod 2 approved site-specific ingestion cleanup level obtained from *Eek Federal Scout Readiness Center Data Gap Investigation Report* (CH2M HILL 2013)

^dCleanup level limited by maximum allowable concentration obtained from 18 AAC 75.341(d), Table B2, under-40-inch zone

-- = not applicable

AAC = Alaska Administrative Code

ADEC = Alaska Department of Environmental Conservation

8 Selected Remedy

Remedial alternatives that were evaluated for petroleum-contaminated soil at Eek FSRC are presented in *Eek Federal Scout Readiness Center Data Gap Investigation Report* (CH2M HILL, 2013). The remedial alternatives that were evaluated were institutional controls (ICs) and removal of petroleum-contaminated soil from the site (source removal).

Petroleum-contaminated soil. The remedy selected for petroleum-contaminated soil at Eek FSRC is source removal. ARNG is committed to implementing, monitoring, maintaining, and enforcing all components of the selected remedy to ensure that site conditions remain protective of human health. The major components of this remedy are as follows:

- Excavation of petroleum-contaminated soil containing contaminants at concentrations greater than site-specific cleanup levels presented in Table 2
- Shipment of the excavated soil offsite for either offsite thermal treatment or disposal in an approved offsite landfill


9 Post-closure Remedial Review

When the Eek FSRC site meets the applicable cleanup levels shown in Table 2, the remedial actions can be considered complete without ICs, in accordance with 18 AAC 75.380(d)(1) and the ADEC Site Closure Memorandum (ADEC, 2009), subject to the following conditions:

- In accordance with 18 AAC 75.325(i), at a site where DRO and RRO are present in soil at concentrations above the migration-to-groundwater cleanup levels established in 18 AAC 75.341(d), Table B2, any proposal to transport soil offsite will require ADEC approval.

- Soil containing residual contamination may not be placed in surface water or other environmentally sensitive areas, in accordance with 18 AAC 70.
- Under 18 AAC 75.380(d)(1), ADEC may require additional site characterization or remedial action if new information is discovered that leads ADEC to make a determination that the cleanup action described in this Record of Decision is not protective of human health, safety, and welfare and the environment.

The undersigned parties concur with this Record of Decision for Eek FSRC.



JOEL T. GILBERT, Lieutenant Colonel
Alaska Army National Guard

29 May 13
Date



DEBRA CARROUET, Environmental Specialist
Federal Facilities Section, Contaminated Sites Program
Alaska Department of Environmental Conservation

5/31/15
Date

10 References

- Alaska Department of Environmental Conservation (ADEC). 2008. *Cumulative Risk Guidance*. June 9.
- Alaska Department of Environmental Conservation (ADEC). 2009. Site Closure Memorandum. July 24.
- Alaska Department of Environmental Conservation (ADEC). 2010. *Policy Guidance to Developing Conceptual Site Models*. October.
- Alaska Department of Environmental Conservation (ADEC). 2011a. *Guidance on Using Institutional Controls in Oil and Other Hazardous Substances Cleanups*. February.
- Alaska Department of Environmental Conservation (ADEC). 2011b. *Implementing Guidance for the Method 3 Hydrocarbon Risk Calculator*. February 25.
- Alaska Department of Environmental Conservation (ADEC). 2012. *Ecoscoping Guidance*. January.
- Alaska Department of Environmental Conservation (ADEC). 2013. Acceptance letter of final *Eek Federal Scout Readiness Center Data Gap Investigation Report*. February 4.
- CH2M HILL. 2013. *Eek Federal Scout Readiness Center Data Gap Investigation Report*. Prepared for Alaska Army National Guard, Fort Richardson, Alaska. January.



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
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File No: 2412.38.001

March 26, 2015

LT Jennifer Nutt
Alaska Army National Guard
Construction Facilities Management Office
PO Box 5800
JBER, AK 99505-0800

Re: Remedial Action Report, Federal Scout Readiness Center, Eek, Alaska, March 17, 2015
Cleanup Complete Determination

Dear LT Nutt:

The Alaska Department of Environmental Conservation (ADEC) received the Final Remedial Action Report, Federal Scout Readiness Center, Eek, Alaska. The report documents the removal and proper disposal of 17 tons of soil with diesel range organics (DRO) and residual range organics (RRO) contamination above approved cleanup levels.

The 2013 Record of Decision (ROD) for the Eek Federal Scout Readiness Center (FSRC) identified DRO, DRO aliphatics, DRO aromatics, RRO, RRO aliphatics, and RRO aromatics as the contaminants of concern. The ROD established the following site-specific cleanup levels: 12,500 mg/kg, for total DRO; 10,000 mg/kg for the DRO aliphatics; 4,100 mg/kg for the DRO aromatics; 5,693 mg/kg for total RRO; 20,000 mg/kg for RRO aliphatics; and 3,000 mg/kg for RRO aromatics.

Upon review of the Draft Remedial Action Plan for Eek AKARNG requested and ADEC approved the use of silica gel cleanup procedures on analytical samples to minimize biogenic interference from naturally-occurring organic compounds. Additionally, ADEC and AKARNG have approved a total DRO cleanup level of 10,250 mg/kg (ADEC Method Two, Under 40-Inch Zone Ingestion cleanup level provided in Table B2 of 18 AAC 75.341[d]) and a total RRO cleanup level of 3,000 mg/kg (ADEC Method Two, Under 40-Inch Zone Ingestion cleanup level for RRO aromatics provided in Table B2 of 18 AAC 75.341[d]) to eliminate the need to sample for EPH to determine DRO and RRO aliphatic and aromatic fractions.

Five separate excavations removed the 17 tons of contaminated soil and confirmation sampling showed all areas to meet the cleanup levels.

Remaining petroleum contamination in soil is below approved cleanup levels. This site will receive a "Closed" designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325. A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
3. This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99811-1800, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99811-1800, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have any questions on this letter, please contact me at 907-269-0298 or Deb.Caillouet@alaska.gov.

Sincerely,



Deb Caillouet
Environmental Program Specialist

Attachment 5: Public Notice of Availability and Regulatory Comments



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No: 2412.38.001

December 18, 2018

Sent via electronic mail only

Patrick Geary
State of Alaska DMVA
AKARNG Environmental
PO Box 5800
JBER, AK 99505

Re: Finding of Suitability to Transfer (FOST) Eek RC
AKARNG Eek Federal Scout Armory
Hazard ID 1864

Dear Mr. Geary:

The Alaska Department of Environmental Conservation (ADEC) Juneau Office has reviewed the FOST for Eek and has no objections. The AKARNG Eek Federal Scout Armory (FSA) is an ADEC Contaminated Site and is currently listed as "cleanup complete". A Record of Decision (ROD) signed by both the AKARNG and the ADEC in 2015 documented the cleanup levels for the site. For soil, these were site-specific calculated using the ADEC Method 3 calculator. The resulting cleanup levels for soil were 5,693 milligrams per kilogram (mg/kg) for residual range organics (RRO) and 12,500 mg/kg for DRO. The suprapermafrost groundwater exposure pathway was incomplete due to low recharge rate and was not subject to the groundwater cleanup levels set forth in 18 AAC 75.345(b) Table C. Additionally, the suprapermafrost groundwater was not expected to be a future drinking water source. Although the suprapermafrost groundwater was impacted by petroleum, the contamination did not appear to be migrating off-site, therefore, no further action was needed. Roughly 17 tons of petroleum impacted soils were excavated in during a cleanup action. Confirmation soil sample results were all below the approved cleanup levels and the site was granted a Cleanup Complete Determination on March 27, 2015.

If you have any questions regarding this letter or concerns please feel free to contact me by telephone at 907-465-5207 or email at Danielle.Duncan@alaska.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Danielle Duncan', with a long horizontal line extending to the right.

Danielle Duncan
Project Manager