CITY OF UNALASKA, ALASKA HISTORIC PRESERVATION COMMISSION REGULAR MEETING THURSDAY, JUNE 20, 2024, 6:00 P.M. AGENDA

ZOOM Meeting Link:

https://us02web.zoom.us/j/81310428861?pwd=ZTdnZmRZbytgTlM4RWUreHM5L25WZz09

Meeting ID: 813 1042 8861 Access Code: 592925

Toll Free Numbers: (833) 548 0276 (833) 548 0282 (877) 853 5247 (888) 788 0099

CALL TO ORDER
ROLL CALL
REVISIONS TO THE AGENDA
APPEARANCE REQUESTS
ANNOUNCEMENTS

MINUTES: Draft minutes from the meeting January 18, 2024

PUBLIC HEARING

No Items

OLD BUSINESS

No Items

NEW BUSINESS

No Items

WORKSESSION

- 1. Presentation by Robert Johnston, Air Force Civil Engineer Center Remedial Project Manager, regarding the Driftwood Bay Radio Relay Site Five Year Review
- 2. Presentation regarding the Amendment to the original Finding of Effect letter regarding USACE FUDS' cleanup efforts at the WWII-era Latrine 1 site on Hill 400 (Bunker Hill)
- 3. Presentation regarding consultation on the application for federal assistance from the Alaska Department of Transportation and Public Facilities (DOT&PF) for proposed upgrades to the Unalaska Airport under the Tom Madsen (Dutch Harbor) Airport Unalaska Taxiway and Apron Rehabilitation Project (No. SFAPT00178)

ADJOURNMENT

Principles of the Unalaska Planning Commission

- 1. <u>The Position</u>: In any community, the position of Planning Commissioner is a highly respected and honored one.
- 2. The Job: The job of Planning Commissioner is to serve the public, as representatives of the City Council and to the best of their ability, in ensuring sound planning and growth management in Unalaska. All decisions of the Planning Commission should be based on sound planning principles and practices, and not on the personal opinion of individual Planning Commissioners. Once the Planning Commission makes a recommendation to the City Council, the job of the Planning Commissioners and Planning Commission is over, in terms of that particular action.
- 3. <u>Integrity</u>: Planning Commissioners are appointed by City Council. The actions, behavior, and comportment of each Planning Commissioner reflect not only on that Planning Commissioner's integrity but also on the integrity of the City Council and of the entire City government.
- 4. <u>Collaboration</u>: An individual Planning Commissioner is not a "lone wolf," but is part of a collective body. As such, each Planning Commissioner is expected to act in a collaborative manner with his and her fellow Planning Commissioners.
- 5. Respect Each Other: While it is understandable to sometimes disagree with your fellow Planning Commissioners on issues brought before the body, and appropriate to publically vocalize that disagreement during Planning Commission meetings, a Planning Commissioner should always respect the opinion of their fellow Commissioners and treat each other with respect.
- 6. <u>Majority Rules</u>: It is important to remember that, at the end of the day, the majority rules. So, after each action is brought before the body, discussed, and voted upon, Planning Commissioners must accept and respect the rule of the majority even if the ruling was counter to an individual Commissioner's position.
- 7. Respect Staff: A Planning Commissioner should respect the opinion of City Planning Staff, whether the Planning Commissioner agrees with staff or not. Planning Staff Members are professionals who are employed to serve not only the Planning Commission and general public, but the City Council.
- 8. The Las Vegas Rule: What comes before the Planning Commission must stay before the Planning Commission. This means there can be no outside negotiating with petitioners or with the public regarding applications brought before the Commission. And, all discussions pro or con concerning a petition before the Planning Commission, must take place solely within Planning Commission meetings.
- Respect Applicants and Public: Each Planning Commissioner must always show professionalism and respect for applicants and the general public – regardless of the position held by that Planning Commissioner or by the Planning Commission.
- 10. <u>Upholding the Principles</u>: Any member of the Planning Commission who finds that he or she cannot uphold and abide by the above principles should resign from the Commission.

PROCEDURES FOR THE CHAIR

Approval of Minutes

The Chair states: "The minutes were included in the packet. Are there any corrections to the minutes?" [pause to wait for commissioners to object]. "Hearing none, if there are no objections, the minutes are approved as printed."

OR

If there are objects to the minutes, then...

- 1. Ask for a motion to approve the minutes as printed. And a second.
- 2. Facilitate Commission discussion.
- 3. Amendments will need a motion and a second.
- 4. When there is no more discussion, call for a vote on any amendments.
- 5. Continue discussion until there is none further, then call for a vote on the minutes as amended.

Public Hearings

- 1. Open the public hearing.
- 2. Notify the public that they may raise their hand and speak from their seats.
- 3. Read the title of the first item.
- 4. Ask if any member of the public wishes to speak to the item. They may do so by raising their hand.
- 5. When discussion has ended, read the title of the second item.
- 6. Again ask for public discussion.
- 7. Continue until all items on the public hearing are complete.
- 8. NOTE: No commissioners or staff should give any input during the public hearing.

Resolutions under new business or old business

- 1. Read the title of the first resolution.
- 2. Ask for declaration of ex parte communications and conflicts of interest from commissioners.
- 3. Any question of whether a conflict of interest exists will be settled by a majority vote of the Commission. Members with a conflict will be asked to sit in the audience during this discussion/vote.
- 4. Ask for staff presentation.
- 5. Ask for guestions from Commissioners of staff.
- 6. Ask for a presentation from the applicant.
- 7. Ask for questions from Commissioners of the applicant.
- 8. Ask for a motion to approve the resolution. And a second.
- 9. Facilitate commission discussion.
- 10. If any members of the public have signed up to speak on the topic, they will be given a chance to speak. The chair must set a time limit (such as 2 minutes) to each public comment. Time limits can be objected by commissioners and subsequently put to a vote if necessary.
- 11. Following public testimony, continue commission discussion until there is nothing further.
- 12. NOTE: Each member of the public only gets one chance to speak, but anyone who signs up with staff before the commission votes shall be given their one chance to speak before the vote occurs.
- 13. Call for a vote.
- 14. Repeat for each resolution on the agenda.

City of Unalaska HISTORIC PRESERVATION COMMISSION

Regular Meeting Thursday, January 18, 2024 6:00 p.m. P.O. Box 610 • Unalaska, Alaska 99685 (907) 581-1251 www.ci.unalaska.ak.us Unalaska City Hall Council Chambers 43 Raven Way

Commission Members Ian Bagley

Virginia Hatfield

Travis Swangel, Chairman
City Representative: Bill Homka, City Manager
Secretary: Cameron Dean, Planning Director

Commission Members
Caroline Williams
Rainier Marquez

MINUTES

- 1. Call to order. Swangel called the Regular Meeting of the Historic Preservation Commission to order at 6:00 p.m. on January 18, 2024 in the Unalaska City Hall Council Chambers.
- 2. Roll Call: Present: Absent:

Travis Swangel Caroline Williams Virginia Hatfield Rainier Marquez

Ian Bagley

- 3. Revisions to Agenda: No revisions and agenda adopted
- 4. Appearance requests: None
- 5. Announcements: Museum reopened, winter hours, Thursdays thru Sundays, 12:00 to 4:00pm.
- 6. Minutes: Minutes for December 21, 2023 meeting were approved with no objections.
- 7. Public Hearing:

RESOLUTION 2024-01: A RESOLUTION APPROVING THE HISTORIC PRESERVATION COMMISSION 2023 ANNUAL REPORT AND FILING THE SAME WITH THE UNALASKA CITY COUNCIL. No public comment.

- 8. Old Business: None9. New Business: None
 - **RESOLUTION 2024-01:** A RESOLUTION APPROVING THE AMENDED HISTORIC PRESERVATION COMMISSION 2023 ANNUAL REPORT AND FILING THE SAME WITH THE UNALASKA CITY COUNCIL. -- Planning Staff reviewed with the Commissioners the Resolution. Commissioners commented on the 2024 Historic Preservation Goals then was elaborated. City Manager Homka spoked about repatriation of Unangan materials and artifacts. Hatfield added that we will have human remains that will be brought back home and will be discussed in the future. A mausoleum in the future was brought up to where they are protected and respected but also not buried. Resolution was voted 5-0 and approved with no objections.
- 10. Work session: None
- 11. Adjournment: Having completed the agenda, the meeting was adjourned with no objection at 6:26 p.m.

Cameron Dean	Travis Swangel
Secretary of Commission	Commission Chairman
Date	Date



Ahtna Solutions, LLC 110 W. 38th Avenue, Suite 200L Anchorage, AK 99503 www.ahtnadiversified.com

Phone: (907) 563-3233

Design-Build • Construction • Environmental • Government Services

Subject: Distribution of Driftwood Bay Radio Relay Site (RRS), Five-Year Review Fact Sheet

On behalf of the Air Force Civil Engineer Center (AFCEC), Ahtna is distributing copies of the enclosed Five-Year Review (FYR) Fact Sheet summarizing the findings of the FYR process for the Driftwood Bay RRS. We kindly request your assistance in making these materials available to the public at your facility.

Additional information may be obtained from the following representative:

Robert Johnston AFCEC Remedial Project Manager 10471 20th St., Ste. 326 PO Box 6898, JBER, Alaska 99506-2201 907-552-7193 robert.johnston.17@us.af.mil

Sincerely,

Ahtna Solutions, LLC

Low sain

Leslie Davis, PMP

Deputy Project Manager

Attachment:

1. FYR Fact Sheets

Driftwood Bay Radio Relay Site (RRS) Sites SS002, SS007, SS010, and WP003 Five-Year Review Fact Sheet



What is a Five-Year Review?

The purpose of a Five-Year Review (FYR) is to determine if remedies at a site are/remain protective of human health and the environment. If any issues that affect protectiveness are found during the FYR, recommendations are made to address them. The report addresses three major questions:

- Is the remedy functioning as intended?
- Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of remedy selection still valid?
- Has any other information surfaced that could affect the protectiveness of the remedy?

Site Chronology

- 1961–1977 The United States Air Force (USAF) operated the Driftwood Bay RRS communication facilities.
- 1991 Facility demolition and onsite waste disposal was performed.
- 1995–2007 Remedial investigations, remedial actions, and monitoring activities occurred at all four sites.
- 2007 The United States
 Environmental Protection Agency determined that the RRS met the requirements for a determination of "No Further Remedial Action Planned" under the Comprehensive Environmental Response, Compensation, and Liability Act.
- 2015-2021 Removal actions and long-term monitoring was conducted.
- 2018 The first FYR was completed for SS002, SS007, and SS010.

Site History

Driftwood Bay RRS was established in 1961 as a White Alice Communications Systems facility, was redesignated as a Radio Relay Site (RRS) in 1969, and was deactivated in 1977. Operations at Driftwood RRS that impacted the environment include transfer and storage of petroleum, oils, and lubricants (POL), vehicle and electronic system maintenance, and waste disposal (landfills).

Four sites are included in this FYR. SS002 is a permitted landfill that received waste from the demolition of the RRS. SS007 is the former POL tank farm that historically supported the RRS while in operation. SS010 is the former water supply pumphouse powered by a generator that was supplied by a 550-gallon underground storage tank. WP003 is a POL waste pit from a floor drain outfall at the former composite building. Petroleum constituents are the contaminants of concern at these sites. Additionally, asbestoscontaining materials were disposed of at SS002.

Site Map



LEGEND

Land Use Control Restriction

Installation Boundary

★ LUC Sign Well Point



Packet Page 6

Developments Since the Last Five-Year Review

This is the second FYR for SS002, SS007, and SS010 and the first FYR for WP003. The review of documents, site data, and the results of site inspections indicates that the remedies at these sites are functioning as intended to prevent exposure to site contaminants. The remedies at all four sites involve land use controls (LUCs) and/or institutional controls (ICs).

- In February 2018, an IC Plan was issued for WP003, and in April 2023, the USAF issued a revised LUC Management Plan that identifies the LUCs in effect at all four sites.
- Notices of Environmental Contamination for SS002, SS007, and SS010 were filed with the Alaska Department of Natural Resources (DNR) in 2018.
- LUC/IC inspections occurred at all four sites in 2017, 2019, 2020, and 2021. LUCs/ICs at all sites are functioning as intended, warning signs are in place, and LUC/IC reports have been submitted to the Alaska Department of Environmental Conservation (DEC).
- Groundwater sampling occurred at SS007 in 2017, 2019, and 2021. The DEC status is currently "Cleanup Complete with ICs," however, sampling of diesel-range organics (DRO) is being performed to provide additional data for a DEC determination that cleanup is complete and the site can support unlimited use and unrestricted exposure (UU/UE).
- Corrective actions to repair and restore the SS002 landfill cover were completed in 2022.

Issues, Follow-up Actions, and Schedule Dates

In general, the remedies at all four sites are protective of human health and the environment. No issues affecting protectiveness were identified at SS002, SS007, and SS010. WP003 was determined to be protective in the short term because the extent of residual contamination was determined in 2017, inspections are performed to confirm no unauthorized access or excavation is occurring, and an IC Plan for WP003 was developed in 2018. For long-term protection, a Notice of Activity and Use Limitations is required to be filed with DNR's Aleutian Island Recording District. This action is currently in progress.

Additional recommendations included in the FYR are the continued groundwater sampling for DRO to document the attainment of UU/UE at SS007 and updating the DEC Contaminated Sites Database to reflect the current site status for SS010 of "Cleanup Complete with ICs."

Protectiveness Summary

Site SS002 • Protective

Site SS007 • Protective

Site SS010 • Protective

Site WP003 • Short-term Protective

Next Five-Year Review

February 2029

Contact Information

The repository/docket location for all the publicly available site-specific documentation is located at:

https://ar.afcec-cloud.af.mil/



2022 FIVE-YEAR REVIEW FOR SITES SS002, SS007, SS010, AND WP003 AT DRIFTWOOD BAY RADIO RELAY SITE, ALASKA



Prepared By:
Ahtna Solutions, LLC
110 West 38th Avenue, Suite 200L
Anchorage, Alaska 99503

FREDIN.PAUL.WILL Digitally signed by FREDIN.PAUL.WILLIAM.1139031101 Date: 2023.11.03 13:10:24-05'00'

PAUL W. FREDIN, Colonel, USAF, P.E. Deputy Director, Environmental Management Air Force Civil Engineer Center 3 Nov 23

Date

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Figure 1 Site Location and Vicinity

Additional ROD/DD Site Figures are included.

ACRONYMS AND ABBREVIATIONS

AAC	Alaska Administrative Code
ACM	asbestos-containing material
ADEC	Alaska Department of Environmental Conservation
ADNR	Alaska Department of Natural Resources
AFCEC	Air Force Civil Engineer Center
amsl	above mean sea level
	aboveground storage tank
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CES	Civil Engineering Squadron
COC	contaminant of concern
CS	Contaminated Site
DRO	diesel-range organics
	United States Environmental Protection Agency
ETM	exposure tracking model
FYR	Five-Year Review
GRO	gasoline-range organics
IC	institutional control
LTM	long-term monitoring
LUC	land use control
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MNA	monitored natural attenuation
NCP	National Contingency Plan
n.d	no date
NEC	Notice of Environmental Contamination
NPL	National Priorities List
PA	Preliminary Assessment
PAH	polycyclic aromatic hydrocarbon
POL	petroleum, oils, and lubricants
RAO	remedial action objective
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RRO	residual-range organics
	Radio Relay Site
SARA	Superfund Amendments and Reauthorization Act
	Site Inspection
TAH	total aromatic hydrocarbons
•	total aqueous hydrocarbons
TPH	total petroleum hydrocarbons

USAFUnited States Air Force
USTunderground storage tank
UU/UEunlimited use/unrestricted exposure
VOCvolatile organic compound

I. INTRODUCTION

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The United States Air Force (USAF) is preparing this FYR pursuant to United States Department of Defense policy, consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Contingency Plan (NCP) (Title 40 Code of Federal Regulations Section 300.430(f)(4)(ii)) and considering United States Environmental Protection Agency (EPA) policy.

This is the first FYR for Site WP003 and the second FYR for Sites SS002, SS007, and SS010 at the Driftwood Bay Radio Relay Site (RRS), Alaska. Statutory reviews under CERCLA are not required for these sites because no CERCLA contaminants exceeding acceptable exposure levels protective of human health and the environment remain. These sites are regulated under Alaska state law and this FYR has been prepared because contamination resulting from releases of petroleum products remain at WP003, SS002, SS007, and SS010 above levels that allow for unlimited use and unrestricted exposure (UU/UE). The four sites are currently listed as "Active" in the Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Database.

LF006 was originally designated for inclusion in this FYR, but due to the recent collection of site data and subsequent ADEC determination that cleanup is complete and the site can support UU/UE (ADEC, 2022d), this FYR no longer includes a technical assessment of the protectiveness of the remedy at LF006 or a protectiveness statement for LF006.

Sites SS002, SS007, SS010, and WP003 do not have official Decision Documents. The remedies for these sites were determined through correspondence between the USAF and ADEC. For Site SS002, the remedy consists of institutional controls (ICs) and annual inspections, consistent with the recommendation made in the *Preliminary Assessment/Site Inspection for Driftwood Bay RRS* (USAF, 2005). ADEC concurred with the Preliminary Assessment/Site Inspection (PA/SI) report in a 19 December 2005 letter (ADEC, 2005). For Sites SS007, SS010, and WP003, the site remedies were documented in the ADEC *Determination of Final Compliance for Driftwood Bay* letter (ADEC, 2010).

The remedy for SS007 included ICs and monitored natural attenuation (MNA). The remedies for SS010 and WP003 were ICs. An IC Plan for SS010 and SS002 was finalized in 2015 (USAF, 2015 and 2016). An IC Plan for WP003 (Air Force Civil Engineer Center [AFCEC], 2018) was completed in 2018. Interim IC inspections occur as part of the Driftwood Bay RRS LTM program. The remedy for LF006 was excavation, as documented in the Record of Decision (ROD) (USAF, 2013).

The Driftwood Bay RRS FYR was performed by Ahtna Solutions, LLC, (Ahtna) on behalf of AFCEC under contract FA8903-22-C0016. Participants included AFCEC, Ahtna, and ADEC personnel with expertise in site investigation and remediation. The review began in September 2022.

Site Background

This section presents background information on the Driftwood Bay RRS sites included in this FYR. The site chronology summarizing significant events and documents is provided in Appendix B.

Site Location and History

Driftwood Bay RRS is located on the north-central coast of Unalaska Island, part of the Fox Islands on the Aleutian Archipelago of Alaska. The installation is located approximately 15 miles from Unalaska/Dutch Harbor (Figure 1). Access to the site is limited to air transportation and seagoing landing craft.

Driftwood Bay RRS was one of 18 Distant Early Warning Line stations constructed in Alaska. The site was activated in 1961 as a White Alice Communications Systems facility, was redesignated as an RRS in 1969, and was deactivated in 1977 (USAF, 2018b). The installation consisted of a composite building with dormitories, office space, a vehicle maintenance shop, and equipment for standby power generation; two billboard antennas and White Alice arrays; two receiver antennas; petroleum, oils, and lubricants (POL) storage and distribution facilities; an equipment/maintenance building; an ammunition storage shed; a water supply system; a disposal area; and an airstrip.

The installation was divided into the Top Camp and Lower Camp areas. The runway and Lower Camp are located just south of Driftwood Bay at an elevation between 5 and 100 feet above mean sea level (amsl). Top Camp is located approximately 3 miles west of Driftwood Bay, on a plateau approximately 1,300 feet amsl.

In 1991, the United States Army Corps of Engineers, under the Formerly Used Defense Site Program, demolished buildings and cleaned up solid wastes at the Driftwood Bay RRS (USAF, 2011). Demolition debris, asbestos-containing material (ACM), aboveground and underground fuel storage tanks, and portions of the fuel pipeline were buried in an onsite landfill (SS002/Landfill No. 1) developed to receive these wastes and permitted by the state of Alaska. Concrete foundations were left in place. A 3,500-foot dirt runway is still present at the Lower Camp portion of the facility (USAF, 2009a).

Operations at Driftwood RRS that impacted the environment include POL transfer and storage, vehicle and electronic system maintenance, and waste disposal (landfills). Historical contamination and investigations are further detailed in the previous FYR (USAF, 2018b), Decision Documents (USAF, 2013; ADEC, 2018), and the site chronology summarized in

Appendix B. A brief description of sites included in this FYR are presented in the following sections. Site locations are shown on Figure 1.

Site SS002 (Contaminated Site [CS] Hazard ID 88)

Site SS002, Landfill No. 1, is located adjacent to (south of) the former composite building at Top Camp. The SS002 landfill was used for disposal of debris from the demolition of the former composite building, POL pump building, aboveground storage tanks (ASTs), underground storage tanks (USTs), pipelines, thermally treated oiled sand from SS007, and other RRS structures during the 1991 demolition of the facility under Landfill Permit No. 88921-BA009, created specifically to receive the waste. The original footprint of the landfill was 40,000 square feet but has expanded through the years and now encompasses up to 6.8 acres (USAF, 2018b). The landfill contains petroleum-contaminated soil and waste materials, including ACM from the former composite building. The asbestos cell is located near the water tank (USAF, 1996).

Site SS007 (CS Hazard ID 96)

Site SS007, Spill/Leak No. 7 at the POL tank farm, is located along the beach approximately 3,000 feet northeast of the airstrip and bordered on the south by Snuffy Creek (Figure 1). Site SS007 consisted of two 250,000-gallon diesel fuel ASTs, a 25,000-gallon gasoline AST, and a fuel pump house that historically supported the RRS while in operation (ADEC, n.d.). The ASTs were removed during the 1991 demolition activities at Driftwood Bay RRS (USAF, 2009a). Dieselrange organics (DRO) contamination was discovered in soil during a 2005 Preliminary Assessment/Site Investigation (USAF, 2005), and the nature and extent in both soil and groundwater was evaluated in 2007 during a Site Characterization (USAF, 2009a). Six groundwater wells were installed at this site in 2015 to monitor DRO concentrations in the groundwater (USAF, 2018b).

Site SS010 (CS Hazard ID 91)

Site SS010, Spill/Leak No. 2 at the former water supply pumphouse (Figure 1), is located at Lower Camp, approximately 1 road mile from the terminus of the runway. A pipeline transported water from Snuffy Creek to the pumphouse and then to a 24,000-gallon water storage tank located approximately 100 feet south of the former composite building (USAF, 2005). The pumphouse was presumably powered by a generator that was supplied by a 550-gallon UST, the suspected source of DRO contamination. The nature and extent of DRO impacts in soil at Site SS010 are presented in the Preliminary Assessment (USAF, 2005) and in the Site Characterization (USAF, 2009a), and summarized in the previous FYR (USAF, 2018b).

Site LF006 (CS Hazard ID 95)

LF006 consisted of a disposal area located approximately 1 mile south of the sound end of the runway (Figure 1). Site LF006 consists of two areas: the Old Disposal Area and the Electronics Debris Area. These areas have different contaminants of concern (COCs) that are regulated

separately, but the remedies identified in the 2013 ROD (USAF, 2013) for each area are the same. The selected remedies were identified as removal and offsite disposal of the petroleum contaminants for the Old Disposal Area and lead-contaminated soils for the Electronic Debris Area. The Electronic Debris Area met cleanup complete criteria following the 2015–2016 remedial action (USAF, 2017). The nature and extent of DRO and residual-range organics (RRO) impacts remaining at the Old Disposal Area are presented in the remedial action/LTM report (USAF, 2018a) and ADEC Decision Document (ADEC, 2018). The nature and extent of CERCLA-related constituents is summarized in the ROD (USAF, 2013) and post-excavation conditions are summarized in the remedial action report (USAF, 2017).

Additional soil sampling was conducted at the Old Disposal Area of LF006 in 2022 at locations that previously exceeded ADEC cleanup criteria. The 2022 soil samples indicated that no contaminants remain above the ADEC cleanup levels. Therefore, ADEC issued a Cleanup Complete Decision Document (ADEC, 2022d) for LF006, effectively removing the IC requirements.

Site WP003 (CS Hazard ID 90)

Site WP003 is a POL waste pit from a floor drain outfall located approximately 250 feet northeast of the former composite building at Top Camp (USAF, 2011). The COCs based on previous investigations consist of the POL compounds DRO and RRO (USAF, 2005 and 2011). Approximately 1,100 tons of POL-contaminated soil were excavated and removed from the site in 2015 and a 2017 investigation identified that approximately 373 cubic yards of DRO-impacted soil remain (USAF, 2017 and 2018a).

Land and Resource Use

The USAF maintains ownership of most of the land on which Driftwood RRS is located under a Public Land Order (USAF, 2011). The land occupied by Driftwood Bay RRS is "overfiled" by both Aleut Corporation and Ounalashka Corporation. Under the Alaska Native Claims Settlement Act and the Alaska Land Transfer Acceleration Act, regional and village corporations can file applications selecting certain lands for transfer to the Native Corporation and can "overfile" or "top-file" withdrawn lands for future selection when they become available. Site LF006 is located on land owned by the Ounalashka Corporation. Land surrounding Driftwood Bay RRS is part of the Alaska Maritime National Wildlife Refuge and is managed by the United States Fish and Wildlife Service (USAF, 2015).

FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION						
Site Name: Sites SS002, SS007, SS010, and WP003						
		, and Wroos				
EPA ID: AK35700						
Region: 10	State: AK	City/County: Unalaska/Aleutians West Census Area				
		SITE STATUS				
NPL Status: Non-NPL						
Multiple OUs? No	*					
	REVIEW STATUS					
Lead agency: Other Federal Agency [If "Other Federal Agency", enter Agency name]: United States Air Force						
Author name (Federal or State Project Manager): Ahtna Solutions, LLC, on behalf of the Air Force Civil Engineer Center (AFCEC)						
Author affiliation: Cont	ractor					
Review period: 9/9/2022	2 – 4/7/2023					
Date of site inspection: N/A						
Type of review: Discretionary						
Review number: Review #2 for Sites SS002, SS007, and SS010; Review #1 for WP003						
Triggering action date: 6/8/2018						
Due date (five years after triggering action date): 6/8/2023						

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II. RESPONSE ACTION SUMMARY

This section summarizes the basis for taking action and site risks, response actions, and remedial action objectives, as well as the selected remedies and their status of implementation.

Basis for Taking Action

Table 1 summarizes the COCs that have been identified at the Driftwood Bay sites that are included in this FYR.

Table 1: COCs by Site

Site	Medium	COCs
SS002	Soil	DRO
		TPH
SS007	Soil	DRO
		TPH
		Benzo(a)pyrene
		Naphthalene
		Phenanthrene
		Pyrene
	Groundwater	DRO
SS010	Soil	DRO
LF006	Soil	DRO
		RRO
		Benzo(a)pyrene
		Lead
WP003	Soil	DRO
		RRO

Key:

COC contaminant of concern
DRO diesel-range organics
RRO residual-range organics
TPH total petroleum hydrocarbons

Risk Summary

A quantitative risk assessment was not performed for Site SS002 because site-specific chemical concentrations from the landfill perimeter did not exceed ADEC Method Two criteria (USAF, 2009b). In 2009, a quantitative baseline risk assessment was conducted for Sites SS007 and SS010, and a qualitative risk assessment was conducted for WP003 (USAF, 2009b).

The following subsections summarize the potential human health and ecological receptors, the potentially complete exposure pathways, and the potential ecological and human health risks associated with Sites SS007, SS010, WP003, and LF006.

Human Health Risk Summary

The only potential human health receptors evaluated in the risk assessment were recreational visitors, and the potential exposure media evaluated were surface water and soil (USAF, 2009b). The primary exposure pathways evaluated for human health were inhalation, incidental surface water or soil ingestion, and dermal contact with contaminated soil or surface water. Groundwater was not considered a likely exposure pathway for recreational visitors because there is no access to it (USAF, 2009b).

Risk estimate calculations are presented in the 2009 risk assessment (USAF, 2009b) for Sites SS007, SS010, and WP003 and in the previous FYR for Sites SS007 and SS010. The total hazard index and total incremental lifetime cancer risk for each site were less than the non-cancer criterion of 1 and the carcinogenic effects criterion of 1 x 10⁻⁵ (USAF, 2009b). Qualitative assessment of carcinogenic risks associated with DRO and RRO for WP003 determined that the cancer risk did not exceed 1 in 100,000. The human health risk assessment concluded that contaminant concentrations in soil at Sites SS007, SS010, and WP003 do not pose an unacceptable level of risk to human receptors.

The 2009 risk assessment was based on current and anticipated land-use assumptions at the time. To ensure that assumptions and results of the risk assessment remain valid, ICs were recommended for the three sites.

Ecological Risk Summary

An ecological risk assessment (ERA) was not performed for Site SS002 or WP003; however, the 2009 ERA determined that there were no ecological receptors at Top Camp, where Sites SS002 and WP003 are located (USAF, 2009b). There were no contaminants of potential ecological concern identified for Site SS010. The exposure pathways evaluated for Site SS007 include direct contact pathways (i.e., surface water ingestion, incidental soil or sediment ingestion, dermal contact with soil, or sediment, and inhalation of dust), as well as uptake by biota (i.e., plants and animals) and food chain transfer. The ERA concluded that polycyclic aromatic hydrocarbons (PAHs) in soil at Site SS007 pose unacceptable risks to mammalian receptors (masked shrew and sea otter). However, the lithology at Site SS007 consists of medium-to-large gravel to cobble, and burrowing mammals would not burrow at the site to the depth of contamination. Therefore, the exposure pathway to these ecological receptors is incomplete.

LF006 Exposure Pathway Evaluation and Cumulative Risk

Following investigation, cleanup at the site, and additional sampling in 2022, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM) (ADEC, 2022d). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete (ADEC, 2022d). The LF006 site soil and

groundwater are cleaned up to below the ADEC cleanup levels and residual contaminant concentrations meet the human health cumulative risk criteria for residential land use.

Response Actions

Following is a description of the response actions performed at Site SS007 and WP003 prior to the 2010 determination of the site remedy. No response actions were performed at Sites SS002, SS010, or LF006, prior to remedy selection.

At Site SS007, oiled sand was excavated from the foundations of the two 250,000-gallon ASTs during the 1991 demolition activities (USAF, 2005). The oiled sand was thermally treated and then placed in the Site SS002 landfill. Prior to treatment, a sample of the sand was collected and analyzed for TPH and DRO. TPH and DRO were detected at concentrations of 27,000 milligrams per kilogram (mg/kg) and 1,930 mg/kg, respectively (USAF, 2005).

At Site WP003, limited investigations performed at this site in 1985, 1995, and 2005 detected POL contaminants above ADEC cleanup levels. During a 2007 site investigation, 20 soil samples were collected from boreholes advanced along the visibly stained drain outfall area. Three samples exceeded the ADEC cleanup levels for DRO, and one sample exceeded the ADEC site cleanup levels for RRO (USAF, 2018a).

Remedial Action Objectives

Remedial action objectives (RAOs) provide a general description of what the cleanup will accomplish. Sites SS002, SS007, SS010, and WP003 do not have official Decision Documents, so RAOs have not been identified for these sites. The 2013 ROD for LF006 (USAF, 2013) listed the site-specific RAO for the Old Disposal area as follows:

- Prevent ingestion, inhalation, and offsite migration of soil containing RRO in excess of 8,300 mg/kg; benzo(a)anthracene in excess of 4.0 mg/kg; benzo(b)fluoranthene in excess of 4.0 mg/kg; benzo(k)fluoranthene in excess of 40 mg/kg; benzo(a)pyrene in excess of 0.4 mg/kg; dibenzo(a,h)anthracene in excess of 0.4 mg/kg; and indeno(1,2,3-cd)pyrene in excess of 4.0 mg/kg.
- Prevent exposure to and release of potential contamination associated with buried solid waste by removal from environmentally sensitive areas.

The RAO site-specific cleanup levels referenced in this section do not depict the most current cleanup levels, however the Cleanup Complete determination was made in consideration of the promogulated soil cleanup levels (ADEC, 2022d).

Selected Remedies

Sites SS002, SS007, SS010, and WP003 do not have official Decision Documents. The remedies for these sites were determined through correspondence between the USAF and ADEC. For Site

SS002, site recommendations were documented in the *Preliminary Assessment/Site Inspection for Driftwood Bay RRS* (USAF, 2005). ADEC concurred with the Preliminary Assessment/Site Inspection (PA/SI) report in 19 December 2005 letter (ADEC, 2005). For Sites SS007, SS010, and WP003, the site remedies were documented in the *ADEC Determination of Final Compliance for Driftwood Bay* letter (ADEC, 2010). The remedy for LF006 was documented in the 2013 ROD (USAF, 2013) and the 2022 Decision Document (ADEC, 2022d). The remedies selected by the USAF for sites included in this FYR are detailed in the following subsections.

Site SS002

For Site SS002, the remedy consists of ICs, consistent with the recommendation made in the 2005 PA/SI report. (ADEC, 2005; USAF, 2005). The ICs, as identified in the *Remedy Implementation at the Former Driftwood Bay Radio Relay Station, Alaska (USAF, 2015)* consist of:

- LUCs incorporated into the 61thh CES LUC Management Plan to indicate the presence of a closed and permitted landfill with ACM.
- A Notice of Environmental Contamination placed with the Alaska Department of Natural Resources' land records.
- Warning signs posted at the extent of the landfill boundaries to provide contact information for LUC management.

In addition, the following actions were identified for Site SS002 in order to ensure compliance with Title 18 Alaska Administrative Code (AAC) Chapter 60 (18 AAC 60), Solid Waste Management (ADEC, 2022b):

- Adequately backfill depressions and grade to promote drainage without erosion.
- Provide sufficient cover to prevent debris eroding from the landfill.
- Take proper precautions to ensure that asbestos fibers are not released to the air or surface water, and install asbestos warning signs.

Site SS007

The remedy selected for Site SS007 per the 2010 ADEC Determination of Final Compliance for Driftwood Bay Radio Relay Station (RRS) Sites was MNA with ICs (ADEC, 2010). The major components of the selected remedy are as follows:

- Implement ICs to document the location of residual soil contamination and that the groundwater should not be used as a drinking water source.
- Implement MNA to document whether the DRO plume in groundwater is shrinking and the concentrations are decreasing.

Site SS010

The remedy selected for Site SS010 per the 2010 ADEC Determination of Final Compliance for Driftwood Bay Radio Relay Station (RRS) Sites was ICs (ADEC, 2010). The major components of the selected remedy are as follows:

- Implement ICs to document the location and extent of residual contamination.
- Limit land use solely to limited/remote recreational use.
- Document the need to properly manage residual contamination in accordance with applicable regulations.

Site WP003

The remedy selected per the 2010 ADEC Determination of Final Compliance for Driftwood Bay Radio Relay Station (RRS) Sites for Site WP003 was ICs (ADEC, 2010). The major components of the selected remedy are as follows:

- Implement ICs and document the location and extent of residual contamination.
- Limit land use solely to limited/remote recreational use.
- Document the need to properly manage residual contamination in accordance with applicable regulations.

Additionally, the USAF implemented an excavation and offsite removal remedy for WP003 in 2015–2016 (USAF, 2017).

Site LF006

The remedy selected under CERCLA for Site LF006 (Old Disposal Area and Electronic Debris Area) was excavation and offsite disposal (USAF, 2013). Following excavation, the remedy for remaining petroleum contamination selected under state law for the Old Disposal Area was land use controls (LUCs)/ICs established in the 2018 Decision Document (ADEC, 2018). Based on additional sampling in 2022, ADEC issued a 2022 Decision Document (ADEC 2022d) with a Cleanup Complete determination, effectively eliminating the LUC/IC requirements.

Status of Implementation

The remedies for all five sites included in this FYR involve ICs and/or LUCs. This section provides details on the status of implementation for the major components of the site remedies.

In 2015, an IC Plan was developed for Sites SS002, SS007, and SS010 (USAF, 2015). The IC Plan for these three sites included the following elements:

• LUCs for each site will be incorporated into the 611th Civil Engineering Squadron (611 CES) LUC Management Plan (completed July 2015).

- A Notice of Environmental Contamination (NEC) will be placed in the Alaska Department of Natural Resources' (ADNR's) land records (completed April 2018).
- Warning signs placed at the boundary of each site will provide contact information for LUC management (USAF, 2016) (completed August 2015). Signage descriptions are provided in the previous FYR (USAF, 2018b).

In February 2018, an IC Plan was developed for WP003 (AFCEC, 2018) that included the following elements:

- LUCs for the site are incorporated into the 611 CES LUC Management Plan.
- An NEC will be placed in ADNR's land records no later than 31 March 2020.
- Warning signs will be placed at the extent of the site to provide contact information for LUC management no later than 31 October 2019. The signage will be implemented and maintained by the 611 CES.

In August 2019, the USAF issued the revised LUC Management Plan for the Pacific Air Forces Regional Support Center Installation (LUC Management Plan) (USAF, 2019), which includes Driftwood Bay RRS. The Management Plan identifies that there are LUCs in effect at Sites SS002, SS007, and SS010 (USAF, 2019). The revised 2019 LUC Management Plan also includes LUCs in effect for LF006 and WP003. The LUC boundary figure and Table 2-1 from the updated LUC Management Plan, which describes the LUCs in effect, are provided in Appendix C. Copies of the NECs for SS002, SS007, and SS010 are also included in Appendix C. The implementations status of the LUCs/ICs are summarized in Table 2.

Table 2: Summary of Planned and/or Implemented LUCs/ICs

Media, Engineered Controls, and Areas That Do Not Support UU/UE Based on Current Conditions	LUCs/ICs Needed	Impacted Parcels	LUC/IC Objective	Title of LUC/IC Instrument, Documents, or Actions Implemented and Date
Warning signs are in place in accordance with the IC Plan.	Yes	SS002, SS007, SS010, WP003, LF006	Notify site visitors of the presence of onsite contaminants and provide contact information for IC management.	SS002, SS007, and SS010 – Warning signs installed August 2015 LF006 – Warning signs installed in 2020 WP003 – Warning signs installed in 2021
Excavation and digging restrictions are in place to prevent exposure to onsite contamination.	Yes	SS002, SS007, SS010, WP003, LF006	Limit human exposure to contaminants by restricting site use and limiting access and exposure to onsite contaminants.	LUC Management Plan for the Pacific Air Forces Regional Support Center Installation, 2015, amended 2019 IC Plan for Site WP003, 2018

Key:

IC institutional control LUC land use control

UU/UE unlimited use/unrestricted exposure

The first annual IC inspections were conducted at Sites SS002, SS007, and SS010 in 2015, with a subsequent IC inspection performed in 2016 as part of the previous FYR (USAF, 2016 and 2018b). In 2017, IC inspections were performed at all three sites, as well as at WP003 (USAF, 2018a). All five sites included in this FYR were subject to LUC/IC inspections in 2019, 2020, and 2021 (USAF, 2020a; 2021; and 2022). Results of the 2017–2021 IC inspections are discussed in Section IV, Site Inspections.

The following subsections detail site-specific information on remedy implementation.

Site SS002

The Site SS002 remedy selected by the USAF, consistent with the recommendation made in the 2005 PA/SI report was ICs and inspection to ensure ICs have been implemented. Additionally landfill cap monitoring and repair are required to ensure compliance with 18 AAC 60 maintenance and inspection requirements for the closed and permitted landfill with ACM cell. Cap maintenance includes grading of the landfill cover with additional material placed, as necessary, to ensure proper landfill cell coverage (minimum of 2 feet) and to promote runoff while minimizing erosion and infiltration, well as ensuring that ACM are sufficiently covered to prevent the release of fibers to the air or surface water. As detailed in the previous FYR, inspections were carried out in 2015 and 2016, along with the installation of four LUC signs. Inspections of the landfill cap identified limited vegetation success, areas of erosion, and subsidence. Debris presumed to be sourced from the landfill was documented either protruding from the landfill cap or located on the surface. Subsequent inspections have further documented exposed debris and recommended repairs to ensure sufficient cover to prevent debris eroding from the landfill (USAF, 2018a; 2020a; and 2022). Details regarding landfill maintenance progress during the period of this FYR are discussed in Section IV, Site Inspections.

Site SS007

Site SS007 was recommended for MNA with ICs (ADEC, 2010). The site remedies were documented in the ADEC *Determination of Final Compliance for Driftwood Bay* letter (ADEC, 2010), which supported the finding that groundwater at the site is not a current or likely future drinking water source and recommended continued monitoring of DRO to document decreasing concentrations (USAF, 2010). Following the findings of the site characterization, six well points were installed at SS007 in 2015. Samples were collected in 2015 and 2016 and analyzed for DRO, which showed analytical exceedances of ADEC cleanup levels. In 2016, DRO exceeding the ADEC criteria was detected above the groundwater cleanup level of 1.5 milligrams per liter (mg/L) at two of the well points sampled: WP-04 (1.55 mg/L) and WP-06 (3.86 mg/L) (USAF, 2018b).

In 2017, ADEC approved an 18 AAC 75.350 determination for the site, agreeing that groundwater is not to be considered a future potential drinking water source at Site SS007 (ADEC, 2017). Because of the proximity of the well points to the adjacent water, groundwater was determined to be tidally influenced and subject to ADEC surface water quality criteria listed in 18 AAC 70 (ADEC, 2022c) for total aromatic hydrocarbons (TAH) and total aqueous hydrocarbons (TAqH) concentrations.

Because ICs and the 18 AAC 75.350 groundwater use determination are in place, groundwater monitoring is no longer required by ADEC. Site SS007 meets the requirements for a determination of Cleanup Complete with ICs. However, to support a Cleanup Complete without ICs designation, sampling of DRO is planned to continue in order to achieve three consecutive monitoring events below applicable cleanup levels so that the remedy allows for UU/UE. Discussion of the 2017, 2019, and 2021 MNA sampling and results are provided in Section IV, Data Review.

Site SS010

As described previously, the current ICs in place at Site SS010 include land use restrictions and the placement of signage to alert site visitors of the presence of residual contamination.

Site WP003

In 2015, a remedial action took place in which 1,100 tons of POL-contaminated soil were excavated and removed from WP003. Analysis of the post-excavation confirmation samples detected the presence of residual contaminated soil above ADEC cleanup levels. The remedial action report concluded that additional characterization was necessary to define and quantify the full extent of POL contamination soil at the site (USAF, 2017).

In 2017, 17 soil borings were advanced at the POL delineation area from the 2015 remedial action. Only one borehole location contained a DRO concentration that was above site cleanup levels. Additional step-out boreholes were advanced downgradient of the boring hole that exceeded the DRO cleanup level. The analytical results from the step-out locations were below site cleanup levels and indicated the downgradient extent of POL-impacted soils had been adequately defined. The estimated in-place volume of POL-contaminated soil that remains at WP003 is 373 cubic yards (USAF, 2018a).

Site LF006

The 2013 ROD remedy for the Old Disposal Area was removal and offsite disposal for petroleum-contaminated soil and commingled solid waste. During the removal action effort in 2015–2016, approximately 4,850 tons of petroleum-contaminated soil and solid waste were excavated and transported off site for disposal. Confirmation samples collected from the base of the excavation (5–8 feet below ground surface [bgs]) showed DRO remaining in place above the ADEC cleanup level in three locations (16DWB120SL0.5LF006, 16DWB052SL8.0LF006 and 16DWB078SL5.0LF006) (USAF, 2017). ADEC determined that the remaining residual

contamination concentrations did not pose an unacceptable risk to human health or the environment, provided the site-specific ICs were maintained.

However, to support closure without ICs for LF006, additional soil sampling was conducted in 2022 at the three known hot spot locations at the request of ADEC (CES-Insight, 2022b). The samples were analyzed for previously exceeded analytes (DRO, RRO, and benzo(a)pyrene). Analytical results from the 2022 sampling demonstrate that remaining contaminant concentrations are below ADEC requirements. As a result, ADEC issued a Cleanup Complete determination (ADEC, 2022d), which removes the IC requirements and renders the remedy complete. A detailed discussion of the 2022 soil sampling results is provided in Section IV, Data Review.

Systems Operations/Operations and Maintenance

There are no systems operating at Sites SS002, SS007, SS010, LF006, or WP003.

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III. PROGRESS SINCE THE LAST REVIEW

Protectiveness Statement from the Previous FYR

This section includes the exact protectiveness determinations and statements from the last FYR for Sites SS002, SS007, and SS010 (Table 3), as well as the recommendations from the last FYR and the current status of those recommendations (Table 4).

Table 3: Protectiveness Determinations/Statements from the 2018 FYR

Site	Protectiveness Determination	Protectiveness Statement
SS002	Not Protective	The USAF has determined that the remedy at Site SS002 is not protective of human health and the environment due to noted deficiencies in the landfill cover. Debris is protruding through the cap, and subsidence and erosion have been documented. The landfill cover requires corrective action in order to restore the protectiveness of the Site SS002 remedy. However, ICs are in place to minimize exposures to onsite contaminants, and warning signs are present at the site. In order for the remedy to be protective in the long term after correction of these deficiencies, an NEC must be filed in the ADNR's land records to ensure protectiveness.
SS007	Short-term Protective	The remedy at Site SS007 is currently protective of human health and the environment. There are no immediate threats from Site SS007, and the remedy is being implemented as planned. ICs are in place and effective. The Site SS007 remedy is protective because ICs are in place. However, in order for the remedy to be protective in the long term, an NEC must be filed in the ADNR's land records to ensure protectiveness.
SS010	Short-term Protective	The remedy at Site SS010 is currently protective of human health and the environment. There are no immediate threats from Site SS010, and the remedy is being implemented as planned. ICs are in place and effective. However, in order for the remedy to be protective in the long term, an NEC must be filed in the ADNR's land records to ensure protectiveness.

Key:

ADNR Alaska Department of Natural Resources

FYR Five-Year Review IC institutional control LTM long-term monitoring

NEC Notice of Environmental Contamination

Table 4: Status of Recommendations from the 2018 FYR

Site	Issue	Recommendatio ns	Current Status	Current Implementation Status Description	Completion Date (if applicable)
SS002	Deficiencies, including protruding debris and subsidence, were observed at the Site SS002 landfill cap.	Perform landfill cap maintenance to correct cover subsidence and address debris protruding through the cover.	Completed	Repair of the roadway and landfill cap, including cutting and burial of exposed debris, restoring cap thickness with local burrow pit material, and site restoration and revegetation	June 2022
SS002, SS007, and SS010	The NECs for Sites SS002, SS007, and SS010 have not been filed in the ADNR's land records.	The USAF should file the NECs in order to fully implement the ICs, in accordance with the ROD.	Completed	NECs filed with ADNR, Recording District 305 Aleutian Islands	April 2018

Key:

ADNR Alaska Department of Environmental Resources

FYR Five-Year Review IC institutional control

NEC Notice of Environmental Conservation

ROD Record of Decision USAF United States Air Force

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Involvement, and Site Interviews

Activities conducted during the FYR included community notifications and site interviews, data review, and review of available site inspections to assess the protectiveness of the remedy.

A public notice was made available by newspaper posting in the *Bristol Bay Times/Dutch Harbor Fisherman* on 9/22/2022 stating that there was an FYR and inviting the public to submit any comments to the USAF. The results of the review and the report will be made available at the site information repository available electronically on the USAF Administrative Record at https://ar.afcec-cloud.af.mil.

During the FYR process, interviews were conducted to document any perceived problems or successes with the remedy that has been implemented to date. The following parties were interviewed, or interview responses were received from them, on the dates specified:

- Robert Johnston, AFCEC Remedial Project Manager; 3 November 2022
- Cascade Galasso, ADEC Environmental Program Specialist; 28 October 2022

Multiple attempts were made to interview a representative from the Ounalashka Corporation, however no response was received. The results of the interviews that were conducted and correspondence received are summarized in this section, and complete records are provided in Appendix E.

Mr. Johnston (AFCEC) stated that the remedies for the Driftwood RRS sites are functioning as intended, and he has not been made aware of any community concerns regarding Driftwood RRS. Access to the site, limited to plane or boat, was noted as a difficulty that has impacted remedy implementations at the sites. Mr. Johnston also noted that repairs to Site SS002 and the roadway were completed in 2022. Photographs of the 2022 landfill cap repair are provided as follows (USAF, 2022c).



Description: Capping material staged along eastern edge of SS002 (facing northeast). (6/14/20221)



Description: Cap material spread and graded along southern portion of SS02 (Facing west). (6/17/22)

Ms. Galasso (ADEC) confirmed that LTM and IC reports have been submitted to ADEC as required and ICs, LUCs, and LTM appear to be functioning correctly. She also noted that access, remoteness, and weather are difficulties at Driftwood Bay RRS. Ms. Galasso noted that the Site LF006 NEC was not filed with ADNR in a timely manner and remaining contamination would need to be reevaluated. An ROD amendment, Decision Document for remaining petroleum contamination, and Environmental Covenant under the United Environmental Covenant Act with landowner concurrence may be required for the remaining petroleum contamination at the site. The site was recommended to be reevaluated during this FYR.

Data Review

The FYR data review consisted of a review of relevant documents, which included the previous FYR report, and annual LTM and IC reports submitted during the period of this FYR. A complete list of the documents reviewed is included as Appendix A. No analytical data were collected at Sites SS002 or SS010 during the period of this FYR. The following sections summarize the data review conducted for Sites SS007, WP003, and LF006 from 2017 through 2022, if available.

Site SS007

During the period of this FYR, groundwater samples were collected at Site SS007 in 2017, 2019, and 2021. In 2017, analytical groundwater samples were collected from well points WP-02, WP-03, WP-04, WP-05, and WP-06. Well point WP-01 was found to be damaged and thus was not sampled. As a result of the groundwater use determination, groundwater samples in 2017 were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) and PAHs only. The individual BTEX and PAH constituent concentrations were summed to calculate TAH and TAqH concentrations for comparison against the state's surface water quality standards listed in 18 AAC 70 (ADEC, 2022c). The analytical results for the TAH and TAqH summations for all well points sampled in 2017 were below the cleanup levels established in 18 AAC 70.

In 2019, well point WP-01 was repaired and all six well points were sampled for BTEX and PAHs. There were no concentrations of BTEX detected and both TAH and TAqH were either non-detect or below the cleanup levels established in 18 AAC 70 (USAF, 2020a). The site was recommended for a designation of Cleanup Complete with ICs with no further sampling.

However, in 2021 sampling of DRO was reinstated with the objective of achieving three consecutive monitoring events below the applicable cleanup level so that the remedy allows for UU/UE and a determination of Cleanup Complete without ICs. In 2021, no DRO concentrations exceeded the ADEC Table C groundwater cleanup level of 1.5 mg/L. All six well points were sampled with detected concentrations of DRO ranging from 0.181 J mg/L to 0.911 mg/L.

Site SS007 has only been sampled three times for DRO, therefore not enough data points are available to conduct a valid Mann-Kendal analysis. Annual groundwater monitoring for DRO is planned to establish trend data. Results of the 2022 groundwater sampling will be included in the next FYR.

Site WP003

During 2017, a total of 17 soil borings were advanced at Site WP003 to further delineate and quantify the POL-contamination extent (USAF, 2018a). Soil borings were advanced at various depths from 0 to 7 feet bgs. Twenty-one samples were collected from soil borings and submitted for DRO and RRO analysis. Laboratory analysis detected concentrations of DRO in five of the analytical samples submitted, with one sample exceeding the site cleanup level of 8,250 mg/kg. This sample was collected from borehole location BH-97 at a depth of 3.5–4 feet bgs and contained a DRO concentration of 9,210 mg/kg. Concentrations of RRO were detected in 21 of the samples submitted for analysis, and ranged from 7.54 to 295 mg/kg. All of the detected RRO concentrations were below cleanup levels for the site (USAF, 2018a). The downgradient extent of the POLimpacted soil was defined and the estimated volume of contaminated soil remaining at the site was 373 cubic yards.

Site LF006

To support closure without ICs for Site LF006, additional soil sampling was conducted in 2022 at LF006 in accordance with the *Addendum to the Final Work Plan for 2022 LTM Driftwood Bay RRS* (USAF, 2022b). Three samples were collected at known hot spot locations (16DWB120SL0.5LF006, 16DWB052SL8.0LF006, and 16DWB078SL5.0LF006) and submitted for analysis of DRO, RRO, and benzo(a)pyrene depending on location. Results were compared to the most stringent ADEC Method Two soil cleanup levels (ADEC, 2022a). All sample results were below the ADEC soil cleanup levels. Sample 16DWB120SL0.5LF006 was analyzed for the benzo(a)pyrene only and had a reported concentration of 0.834 mg/kg, below the 1.2-mg/kg over-40-inch-zone human health cleanup level. Sample 16DWB052SL8.0LF006 was analyzed for DRO only and both the primary and duplicate results were non-detect. Sample 16DWB078SL5.0LF006 was analyzed for both DRO and RRO, and both contaminants were reported as non-detect.

Site Inspections

Multiple attempts were made to access the Driftwood site during the reporting period of this FYR (September through October, 2022). However, due to weather conditions, travel attempts by both air and boat were unsuccessful. To meet the FYR reporting deadline in June 2023, the most recent site visit performed in summer 2022 for SS002 landfill cap repair activities (CES-Insight, 2022a and 2022b), as well as site inspection summaries from the 2017–2021 LUC/IC LTM program, are the basis for assessing whether the remedies remain protective.

Generally, across the sites there was no evidence of unauthorized access, construction, excavation, or use of groundwater. Wildlife including birds and foxes were observed. Vegetation was growing across the sites and evidence of stressed or stained vegetation was not observed.

Site SS002

Landfill cap inspections were performed at SS002 in 2017, 2019, 2020, and 2021. The reports confirmed the findings of earlier inspections (metal debris scattered around with some pieces protruding from the landfill). The 2019 landfill cap inspection and road condition assessment geospatially identified several areas of exposed landfill debris, predominantly metal, rebar, piping, wood, tar, and presumed ACM (USAF, 2020b). The road from the runway to Top Camp was significantly impacted by erosion from runoff, rockfalls, and landslides across the roadbed. Approximately 0.5 mile of roadway was reported significantly eroded or washed out to the point where it would currently be impassable by heavy equipment or truck traffic (USAF, 2020b).

The necessary repairs to ensure Site SS002 protectiveness and functionality of the landfill cap were completed in June 2022, along with restoration of the roadway between Lower Camp and Top Camp (CES-Insight, 2022a). Activities included cutting and burial of exposed debris, restoring cap thickness with local burrow pit material, and site restoration and revegetation. Based on the predraft letter reporting documenting the 2022 LTM activities, dated 22 November 2022, no additional action is required and the SS002 cap remedy remains protective (CES-Insight, 2022a).

In 2017, one of the of the LUC signs at SS002 was reported damaged and hardware on the remaining intact signs showed signs of corrosion. During 2019, two signs were replaced and reattached to the same posts. Two signs were reported missing during the 2020 site inspection but were replaced during the 2021 field activities. The IC requiring warning signs at the extent of the site are in place and remain effective with no signs of excavation or soil disturbance (UASF, 2022; CES-Insight, 2022a).

Site SS007

Based on the 2021 LTM report, site conditions at SS007 are considered good, with LUC measures observed to be present and discernible in 2021 (USAF, 2020a). LUCs were functioning as intended as there were no reported signs of excavation or soil disturbance. There was no evidence of manmade disturbance at the site or any violations of the site prohibitions and restrictions. The two warning signs for SS007 were located and found to be in good condition. Following the well point WP-01 repair in 2019, all six well points are functioning to allow monitoring of the DRO plume at SS007 (USAF, 2020a and 2022a).

Site SS010

Based on the 2021 LTM report, the LUCs are in effect to limit human exposure at Site SS010. Two warning signs were located and found to be in good condition. There was no evidence observed of manmade disturbance (excavation or soil disturbance) to the site or any violations of prohibitions and restrictions (USAF, 2022a). The roadway repairs conducted in 2022 will help address the significant erosion near the site due to water runoff from the upslope portion of the roadway (USAF, 2022; CES-Insight, 2022a). Replacement of the warning sign north of the site was recommended in the 2021 LTM report and planned for replacement in 2022 (USAF, 2022a).

Site WP003

As documented in the 2021 LTM report, LUCs have been implemented to limit human exposure to the former waste pit (USAF, 2022a). The excavated area at WP003 was reported to have signs of natural vegetation establishing itself (USAF, 2020a). No evidence was observed of disturbance to the site or any violations of prohibitions/restrictions. LUCs are functioning as intended because there were no signs of excavation or soil disturbance. During 2021 LTM activities, a new warning sign was installed at the site on an existing metal pole, facing east at the end of the road, east of the site.

Site LF006

During the 2019 site inspection, the site was found to be well graded and well drained, with no standing water in the former landfill area that was removed in 2015/2016 (USAF, 2020a). Native vegetation was beginning to establish itself in the graded gravel substrate. By 2021, the site was reported with complete vegetation coverage and all berms in place (USAF, 2022a). There has been no evidence of manmade disturbance at the site despite the lack of an NEC documenting the site prohibitions and restrictions due to residual contamination at the site. The 2021 site inspection report recommended that two warning signs be placed at the boundary of the site in 2022 (USAF, 2022a).

The Addendum to the Final Work Plan for 2022 LTM Driftwood Bay RRS (USAF, 2022b) included additional sampling at LF006. During the 2022 field activities, soil samples were collected from three test pits that were dug with a backhoe and backfilled following sample collection (CES-Insight, 2022b).

V. TECHNICAL ASSESSMENT

In accordance with CERCLA, the NCP, and current EPA guidance (EPA, 2001), an FYR should determine whether the remedy at the site is protective of human health and the environment. The technical assessment of a remedy examines three questions that provide a framework for organizing and evaluating data and information and ensures that all relevant issues are considered when determining the protectiveness of the remedy. These questions are presented in the following sections.

QUESTION A: Is the remedy functioning as intended by the decision documents?

Remedies at Sites SS002, SS007, SS010, and WP003 are functioning as intended. Corrective actions to repair the SS002 landfill cover and restore its integrity were completed in 2022. The extent of residual contamination at WP003 was determined in 2017, and inspections are occurring to confirm no unauthorized access or excavation is occurring. An IC Plan for Site WP003 was developed in February 2018 (AFCEC, 2018).

LUCs/ICs for all four sites are in place to minimize exposure to remaining onsite contaminants. The LUCs for all sites are documented in the LUC Management Plan (USAF, 2019). Additionally, LUC inspections have been conducted at all sites. Inspections include reviewing the condition of warning signs, reviewing the condition of landfill cover (SS002), and reviewing the sites for evidence of prohibited activities such as unauthorized excavation. Warning signs are in place and the LUCs/ICs for each site are functioning as intended to prevent exposure to site contaminants. LUC/IC reports have been submitted to ADEC.

At Site SS007, groundwater contamination has been well documented through its LTM remedy and the extent of contamination is constrained to property held by the USAF under a public land order. The site status is Cleanup Complete with ICs and an NEC has been amended to the land record for SS007. At the discretion of the USAF, MNA of DRO concentrations is being performed to provide additional data to document that site conditions meet the criteria for site closure with ICs, as documented in 18 AAC 75.380 (c)(2) (ADEC, 2022a). If sampling results continue to show concentrations remain below Table C groundwater cleanup levels, this would support site closure without ICs and UU/UE. The statistical trend evaluations will be completed after the 2022 sampling event.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

The exposure assumptions used at the time of the remedy selection are still valid. RAOs were not established for Sites SS002, SS007, SS010, and WP003. After the remedies for Sites SS002, SS007, WP003, and SS010 were determined, ADEC issued revised soil cleanup levels, which are risk-based values that incorporate updates to toxicity data. Under the NCP, if a new requirement is promulgated after the ROD is signed and the requirement is determined to be applicable or relevant and appropriate, the remedy should be examined in light of the new requirement to ensure

that the remedy is still protective. With the exception of LF006, these sites do not have official Decision Documents. In addition, cleanup standards were not specified during remedy selection for Sites SS002, SS007, LF006, WP003, and SS010; therefore, the cleanup levels are assumed to be the newly promulgated standards.

There are no changes to the exposure pathways at these sites. There have been no changes in the physical conditions of Sites SS007, LF006, or WP003 that would affect the protectiveness of the remedy. Repairs to the Site SS002 cap and roadway along SS010 have been performed to ensure protectiveness of the sites' remedies.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information that would question the protectiveness of the remedies for the Driftwood Bay RRS sites included in this FYR.

VI. ISSUES/RECOMMENDATIONS

This section includes the issues and recommendations that affect the current and/or future protectiveness of the remedies.

Issues/Recommendations					
Sites without Issues/Recommendations Identified in the Five-Year Review:					
SS002, SS007, SS010					

Issues and Recommendations Identified in the Five-Year Review:

Site WP003	Issue Category: Institutional Controls							
	Issue: LUCs are incorporated into the LUC Management Plan, however an NEC is not on record with the ADNR.							
	Recommendation: An Environmental Covenant or Notice of Activity and Use Limitations should be placed on the property to maintain the ICs identified in the 2018 IC Plan. The ICs will need to document restrictions to groundwater and soil use.							
Affect Current Protectiveness	Affect Future Party Oversight Party Milestone Date Protectiveness Responsible							
No	Yes USAF State 2023							

Other Findings

In addition, the following are recommendations that were identified during the FYR but do not affect current and/or future protectiveness:

- At Site SS007, continue annual groundwater sampling of DRO to document attainment of UU/UE conditions.
- In its 2010 determination letter, ADEC recommended Site SS010 for a status of Cleanup Complete with ICs (ADEC, 2010). The USAF should request this status change for Site SS010, because the site status is listed as "open" in the ADEC Contaminated Sites Database (ADEC, 2022d).
- During the next planned revision of the LUC Management Plan, update Table 2-1 for each Driftwood Bay site included in this FYR.
- Prepare a fact sheet that summarizes the remedy, ICs, and the results of this FYR for the Unalaska community.

VII. PROTECTIVENESS STATEMENTS

	Protectiveness Statement	
Site SS002	Protectiveness Determination: Protective	Planned Addendum Completion Date: Not applicable

Protectiveness Statement:

The remedy at Site SS002 is protective of human health and the environment due to landfill cover preventing direct exposure to onsite contaminants. Additionally, ICs are in place to minimize exposure to onsite contaminants, and warning signs are present at the site. An NEC is currently on file with the ADNR's Aleutian Island Recording District.

	Protectiveness Statement	
Site SS007	Protectiveness Determination: Protective	Planned Addendum Completion Date: Not applicable

Protectiveness Statement:

The remedy at Site SS007 is protective of human health and the environment. There are no immediate threats from Site SS007, and the remedy is being implemented as planned. The Site SS007 remedy is protective because ICs are in place and an NEC is currently on file with the ADNR's Aleutian Island Recording District.

	Protectiveness Statement	
Site SS010	Protectiveness Determination: Protective	Planned Addendum Completion Date: Not applicable

Protectiveness Statement:

The remedy at Site SS010 is protective of human health and the environment. There are no immediate threats from Site SS010, and the remedy is being implemented as planned. ICs are in place and effective and an NEC is currently on file with the ADNR's Aleutian Island Recording District.

	Protectiveness Statement	
Site WP003	Protectiveness Determination: Short-term Protective	Planned Addendum Completion Date: 2023

Protective Statement:

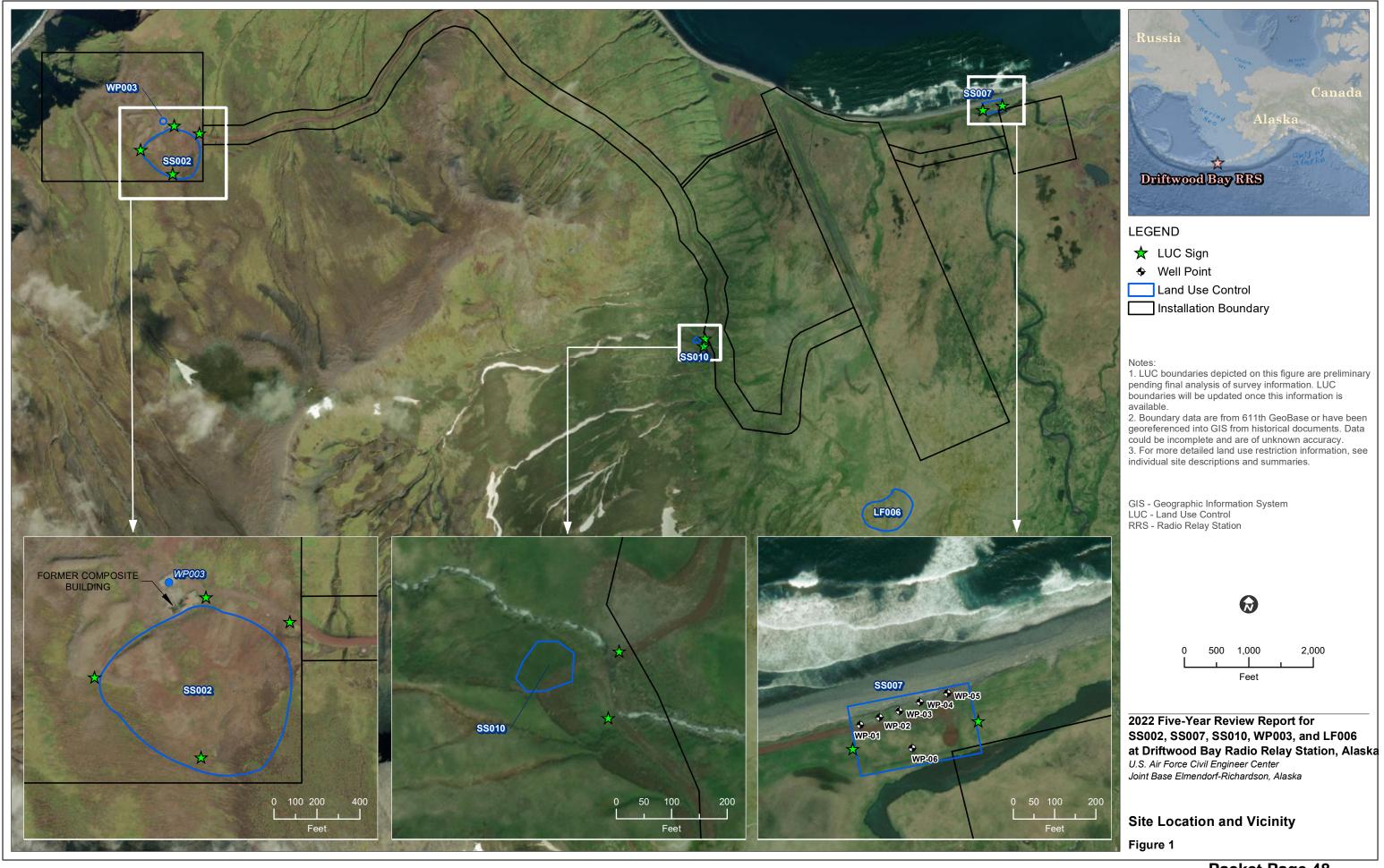
The remedy at Site WP003 is currently protective of human health and the environment in the short term. The extent of residual contamination at WP003 was determined in 2017, inspections are occurring to confirm no unauthorized access or excavation is occurring, and an IC Plan for WP003 was developed in 2018. There are no immediate threats from Site WP003 and the

remedy is being implemented as planned. For long-term protection, a Notice of Activity and Use Limitations is required to be filed with the ADNR's Aleutian Island Recording District.

VIII. NEXT REVIEW

The next FYR report is required five years from the USAF signature date on this FYR.

FIGURES



DRIFTWOOD BAY RRS FIGURES AS REFERENCED IN DECISION DOCUMENTS

DATE: 12 SEPT 2005

PROJ. NO. 20077.043,056

FILE: Duncan-Driffwood5.dwg

DRAWN BY: S. JOHNSON

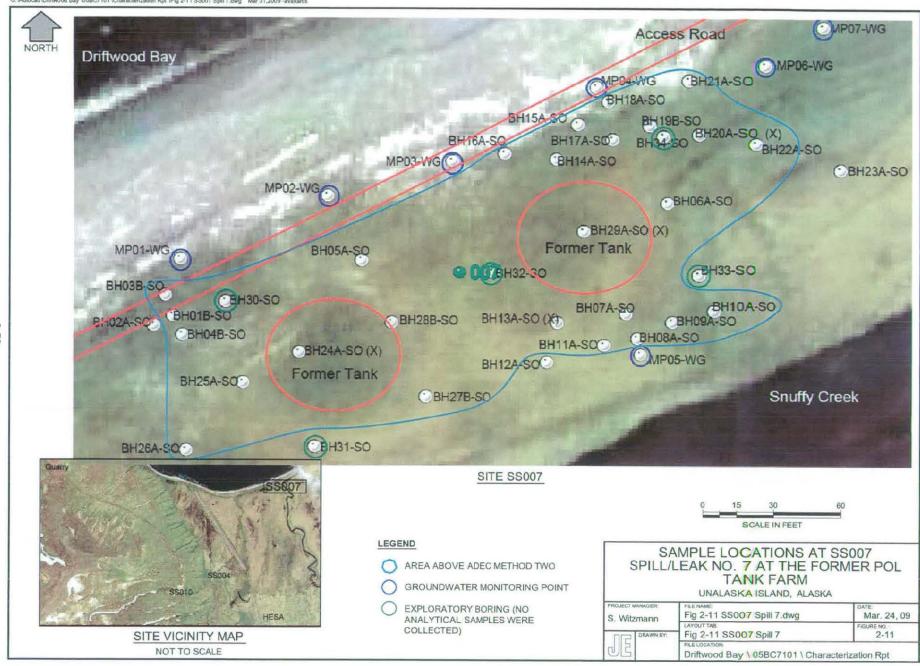
UNITED STATES AIR FORCE

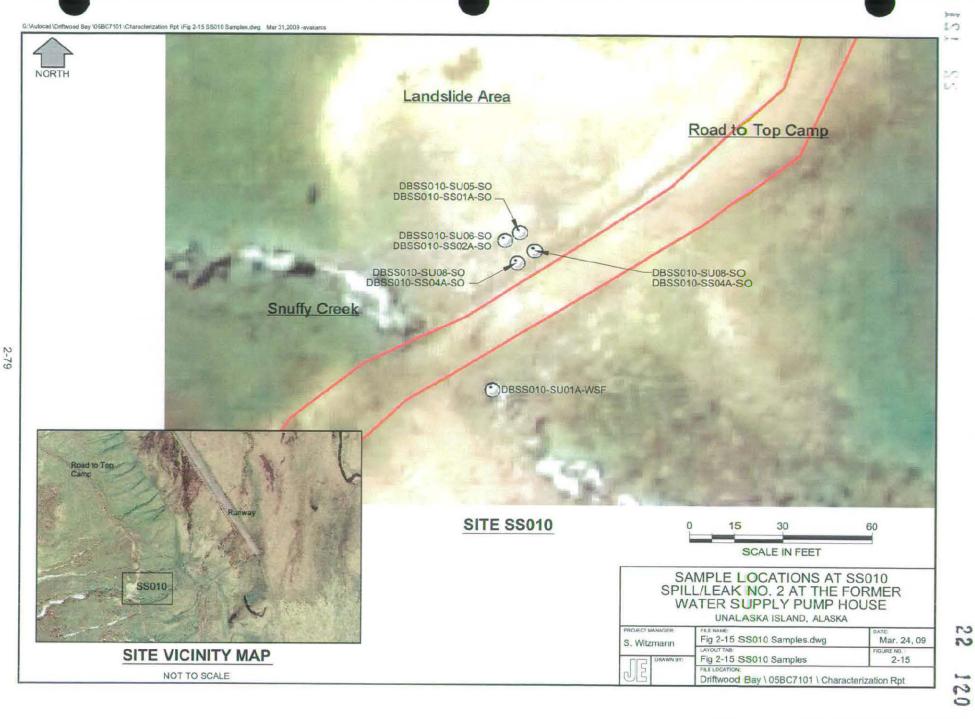
SS002 SITE LOCATION

DRIFTWOOD BAY UNALASKA ISLAND, ALASKA

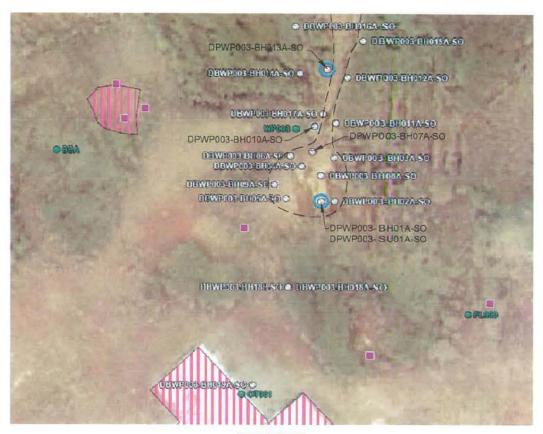


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NOT TO SCALE



SITE WP003



LEGEND

AREA ABOVE ADEC METHOD TWO

() SURFACE STAINING



SAMPLE LOCATIONS AT WP003 POL WASTE PIT

UNALASKA ISLAND, ALASKA

S. Witzmann	Fig 2-4 WP003 Samples.dwg	Mar. 24, (
DRAWN BY:	Fig 2-4 WP003 Samples	FIGURE NO.:
	Driftwood Bay \ 05BC7101 \ Charac	cterization Rpt

APPENDIX A

REFERENCES

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APPENDIX B

SITE CHRONOLOGY

Event	Date
The USAF constructed the Driftwood Bay RRS facility.	1958
The USAF operated the Driftwood Bay RRS communications facilities.	1961–1977
SS007 had two surface soil samples collected near the 250,000-gallon ASTs. Trace concentrations of metals and methylene chloride were detected in the soil samples.	1985
Demolition activities were performed at Driftwood Bay RRS to remove all structures and facilities at the RRS, except for the 3,500-foot dirt runway present at the Lower Camp portion of the facility. Demolition debris, including ACM, aboveground and underground fuel storage tanks, and a portion of the fuel pipeline were buried in an onsite landfill located within SS002.	1991
DRO and TPH were detected in a surface soil sample collected near a seep in the northeast portion of the landfill within SS002.	1995
For SS007, one surface soil sample was collected from each of the foundations of the 250,000-gallon ASTs. In addition, a surface soil sample was collected from the north side of the former pumphouse and a surface water sample was collected. All three surface soil samples were analyzed for DRO, one surface soil was analyzed for TPH, and the surface water sample was analyzed for DRO and BTEX.	
An inspection of the source area was conducted at LF006. A soil stockpile and a debris pile (solid waste) including several 55-gallon drums were noted within the disposal area.	
At SS002, three composite samples of landfill cover were collected and tested in the field for chlorides. Landfill inspection indicated that rehabilitation of the landfill cover to ensure adequate drainage without erosion and sufficient coverage of the ACM cell and other landfill contents was warranted.	2005
At SS007, two of four surface soil samples exceeded ADEC cleanup levels for DRO.	
At SS010, after a landslide, the top of an UST was exposed approximately 15 feet northeast of the pumphouse's former foundation at SS010. A strong hydrocarbon odor and sheen were detected in saturated soil removed from the top of the metal and in the surrounding soil. A soil sample and a duplicate were collected and analyzed for DRO, RRO, PAHs, and RCRA metals. Only DRO exceeded the ADEC cleanup level.	
At WP003, four soil samples collected around the floor drain pipe outfall contained DRO and RRO exceedances. No PCBs were detected and arsenic and lead were within background levels.	
A visual survey of LF006 indicated potential sources of contamination included batteries, vehicle parts, engines, a fire extinguisher, and drums. Depth to groundwater in the vicinity of Lower Camp (includes LF006) was reported in soil boring descriptions at approximately 5–32 feet bgs.	
Soil borings were advanced and groundwater samples were collected at SS007. DRO was detected in all but four of the 29 soil borings at concentrations exceeding the ADEC soil cleanup level. Groundwater samples from five of the six temporary well points sampled had DRO exceeding the ADEC groundwater cleanup level. DRO was also present above ADEC cleanup levels in surface soil near Snuffy Creek. Soil samples were collected at SS010 to evaluate potential impacts to surface water.	2007
At WP003, 20 soil samples were collected from boreholes advanced along the visibly stained drain outfall area at WP003. Three samples exceeded the ADEC Method Two direct contact criterion for DRO, and one sample exceeded the ADEC site cleanup level for RRO.	
Driftwood Bay RRS received a No Further Action Planned determination from the EPA.	

Event	Date
A community survey conducted for LF006 determined residential use is not anticipated because site access is limited to boat or plane.	2008
At SS007, six well points were installed for MNA of DRO in 2015 and sampled in 2015 and 2016. DRO exceeded the cleanup level 1.5 mg/L in four of six wells sampled in 2015, and two of six wells sampled in 2016.	2015–2016
A removal action was performed at WP003 and LF006. Approximately 1,100 tons of POL-contaminated soil were excavated and removed from WP003. At LF006, approximately 4,850 tons of petroleum-contaminated soil and solid waste were excavated and transported off site for disposal.	
The Electronic Debris Area was closed following removal actions conducted in 2015 and 2016. However, one of the 10 sample locations at the Electronic Debris Area resulted in an exceedance of the ADEC Method Two, Table B1, human health cleanup level for benzo(a)pyrene at a concentration of 1.36 mg/kg from a depth of 0.5 foot bgs at sample location 120SL-LF006; this 2015 exceedance location was not excavated.	
Groundwater sampling for BTEX and PAHs was performed at SS007; all samples met ADEC water quality standards. ADEC approved a request for an 18 AAC 75.350 determination that groundwater is not a potential drinking water source for SS007.	2017
At WP003, 20 soil samples were collected from the north and west ends of the 2015 excavation to delineate contamination remaining in place. An estimated 373 cubic yards of POL-contaminated soil remains in place.	
LTM activities including LUC/IC inspections were performed at SS002, SS007, SS010, WP003, and LF006. Groundwater sampling was performed at SS007 for BTEX and PAHs. All samples met ADEC water quality standards.	2019
LTM activities including LUC/IC inspections were performed at SS002, SS007, SS010, WP003, and LF006.	2020
LTM activities including LUC/IC inspections were performed at SS002, SS007, SS010, WP003, and LF006. Groundwater sampling for DRO was performed at SS007. All samples met ADEC cleanup levels.	2021
Repairs to the SS002 landfill and roadway were performed. Additional soil sampling at LF006 confirmed remaining contamination is below the most stringent ADEC Method Two soil cleanup levels.	2022
ADEC issued a Cleanup Complete determination for LF006.	
An FYR of SS002, SS010, SS007, and WP003 was performed.	

Key:

AAC Alaska Administrative Code ACM asbestos-containing material

ADEC Alaska Department of Environmental Conservation

AST aboveground storage tank bgs below ground surface

BTEX benzene, toluene, ethylbenzene, and xylenes

DRO diesel-range organics

EPA United States Environmental Protection Agency

FYR Five-Year Review
IC institutional control
LTM long-term monitoring
LUC land use control
mg/kg milligrams per kilogram
mg/L milligrams per liter

MNA monitored natural attenuation PAH polycyclic aromatic hydrocarbon

PCB polychlorinated biphenyl POL petroleum, oils, and lubricants

RCRA Resource Conservation and Recovery Act

RRO residual-range organics RRS Radio Relay Station

TPH total petroleum hydrocarbons
USAF United States Air Force
UST underground storage tank

APPENDIX C

LUC DOCUMENTATION

TABLE 2-1 Description of LUC¹ Types Currently in Effect at PRSC ERP Sites

Land Use Control Management Plan 2019, PRSC Installations, JBER, Alaska

Installation:	ERP Site(s)	Purpose and Objectives	Prohibitions/Restrictions	Engineering Controls	Expected Durations	Monitoring/ Inspections/ Reporting/ Maintenance	Administrative Elements
Cold Bay LRRS	ST005	migration to groundwater cleanup level for the under 40-inch precipitation zone for soils to a depth	Groundwater not to be used as drinking water until it meets applicable cleanup levels If contaminated soil is excavated or exposed in the future, it will be managed in accordance with the laws and regulations applicable at that time.	• (None specified)	Monitored natural attenuation will occur until groundwater DRO concentrations are less than 1.5 mg/L throughout the aquifer (18 AAC 75.345 Table C) and surface water is less than 10 ug/L TAH, 15 ug/L TAqH at the point where groundwater discharges to surface water.	groundwater DRO concentrations are less than 1.5	ICs in the form of notice in land records will be developed by USAF, with ADEC concurrence, to document that groundwater should not be used as a drinking water source until it meets the applicable cleanup levels. The ICs will also document that if contaminated soil is excavated or exposed in the future it must be managed in accordance with the laws and regulation applicable at that time.
Cold Bay LRRS	OT001	Protect the public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment Protect human health by reducing the risk from potential exposure	• (None specified)	• (None specified)	As no contaminants remain on site above ADEC cleanup levels, site closure is anticipated	(None specified)	• (None Specified)
Driftwood Bay RRS		Prevent the ingestion, inhalation, and offsite migration of soil exceeding risk-based cleanup levels; '• Meet 18 AAC 60 maintenace and inspection requirements • Be protective of human health, safety, welfare, and the environment		Containerize and stage contaminated soil above ADEC cleanup levels for offsite shipment; Perform analytical sampling for waste stream characterization; Offsite disposal; Collect and analyze confirmation samples to ensure that cleanup levels have been met; and Backfill the excavations with locally available material after contaminated soil in excess of ADEC cleanup levels has been removed from the site.	• (None specified)	• (None specified)	• (None specified)
Driftwood Bay RRS	ОТ001	Meet 18 AAC 60 maintenace and inspection requirements Be protective of human health, safety, welfare, and the environment	'Preliminary LUCs will remain in place until ROD is finalized; '• Signage			TBD	TBD
Driftwood Bay RRS	SS002	Meet 18 AAC 60 maintenace and inspection requirements Be protective of human health, safety, welfare, and the environment	Notification prior to digging/excavation is required by ADEC Groundwater not to be used as drinking water until it meets applicable cleanup levels	Signage	IICs and LTM will remain in place until contaminants are below cleanup levels	Groundwater monitoring Inspection of all site areas subject to LUCs Five-Year reviews	• (None Specified)
Driftwood Bay RRS	SS007	Meet 18 AAC 60 maintenace and inspection requirements Be protective of human health, safety, welfare, and the environment	'Preliminary LUCs will remain in place until ROD is finalized; '• Signage			TBD	TBD

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TABLE 2-1 Description of LUC¹ Types Currently in Effect at PRSC ERP Sites Land Use Control Management Plan 2019, PRSC Installations, JBER, Alaska

Installation:	ERP Site(s)	Purpose and Objectives	Prohibitions/Restrictions	Engineering Controls	Expected Durations	Monitoring/ Inspections/ Reporting/ Maintenance	Administrative Elements
Driftwood Bay RRS	SS010	Meet 18 AAC 60 maintenace and inspection requirements Be protective of human health, safety, welfare, and the environment	'Preliminary LUCs will remain in place until ROD is finalized; '• Signage			TBD	TBD
Driftwood Bay RRS	WP003	Meet 18 AAC 60 maintenace and inspection requirements Be protective of human health, safety, welfare, and the environment	'Preliminary LUCs will remain in place until ROD is finalized; '• Signage			TBD	TBD
Duncan Canal RRS	SS006	• (None specified)	Land use restrictions maintained in the property records and signage Control of site access using fencing An impermeable cap placed over surface soil contamination above approved cleanup levels.	Fencing Signage Soil Cap		Land use restrictions maintained in the property records and signage Control of site access using fencing Impermeable cap placed over surface soil contamination above approved cleanup levels LTM and maintenance of contaminant concentrations annually by USAF and LUCs by the USFS. CERCLA Five-Year Reviews would apply until sampling indicates that contaminant concentrations are below the approved cleanup levels. Contaminated soil in the run-off channels will be excavated, loaded onto barges, and shipped off-site to a USEPA approved facility for disposal.	Land use restrictions maintained in the property records and signage LTM and maintenance of contaminant concentrations annually by USAF and LUCs by the USFS. CERCLA Five-Year Reviews would apply until sampling indicates that contaminant concentrations are below the approved cleanup levels.
Eareckson AS	FT001	ICs are designed to prevent activities that could disturb contaminants and affect the performance of the other components of the selected remedies and maintain current land uses, while protecting human health and the environment The objective of the ICs are to prevent access or use of soil and groundwater contaminated with petroleum hydrocarbons, VOCs, and SVOCs.	No land use involving subsurface activitie. No disturbing of contaminated soil or groundwater without ADEC approval ADEC approval	• (None specified)	ADEC 18 AAC 75.341 Method	every 5 years to evaluate status of the ICs and how any IC deficiencies or inconsistent uses have been addressed.	The Eareckson AS Base General Plan (Plan) and USAF land records will be updated to show the boundaries of the sites to restrict excavation of soil and restrict groundwater use. The Plan will contain a map indicating site locations, with restrictions on any invasive activities that could potentially compromise the integrity of soil covers and expose potential contaminants. Dig permits issued by the Base Operating Contractor are required for any excavation or well installation at Eareckson AS. Prior to approving a permit, the Plan will be reviewed to ensure that invasive activities are not taking place within the boundary of the sites where land use has been restricted. USAF will initiate action within 10 days of discovering any activity that may interfere with effectiveness of ICs and notify ADEC as soon as practicable after discovery. USAF will obtain prior concurrence from ADEC to terminate the ICs, modify current land use, or allow anticipated actions that might disrupt protectiveness of ICs (including excavation or well installation). In the unlikely event that the property is to be transferred, USAF will notify ADEC at least 30 days prior to any transfer taking place. If ICs fail or are deficient and could immediately lead to actual risk to human health and the environment, USAF will address the situation promptly, including ADEC notification. USAF will ensure, as appropriate, that any contractor, tenant, or other authorized occupant of land subject to LUCs is informed of the LUCs and is made subject to the requirements of such LUCs.

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Recording District 305 Aleutian Islands 04/19/2018 10:06 AM Page 1 of 2



NOTICE OF ENVIRONMENTAL CONTAMINATION

Recording District: Aleutian

As required by the Alaska Department of Environmental Conservation, Grantee, pursuant to 18 AAC 75.375 the U.S. Air Force, Grantor, as the owner of the subject property, hereby provides public notice that the property located at: Northing 1,209,324 feet, Easting 5,233,728 feet (Zone 10 Alaska State Plane), Top Camp adjacent to the Composite Building Foundation, Unalaska Island, Alaska, 99692, and more particularly described as follows:

T. 72 S., R. 119 W., Section 6, Tract 40, Seward Meridian

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AA 75, Article 3, as amended June 17, 2015. This release and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at http://www.dec.state.ak.us/spar/csp/db search.htm under Hazard ID number 88.

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment. ADEC determined, in accordance with 18 AAC 75.325 – 390 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though a permitted and closed landfill is present at the site.

Attached is a site survey or diagram drawn to scale that shows the property boundaries and locations of asbestos warning signs posted at the site.

Notification to the ADEC is required for approval prior to commencing any subsurface excavation or digging activities within the boundaries of Tract 40, as required by 18AAC 75.325(i). Any work/dig permit must comply with Pacific Air Force (PACAF) Center OI 32-7001 Land Use Control Management.

In the event that the remaining landfill debris becomes accessible by land use activities, or other information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator are required under 18 AAC 75.300 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 75.325-.390.

Pursuant to 18 AAC 75.325(i)(1) and (2), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-.370. At this site, in the future, if soil is removed from the site or groundwater is brought to the surface it must be characterized and managed following regulations applicable at that time.

Charlie Crawford CES-Insight

Return To: Charlie Crawford, CES-Insight, 1701 Shenandoah Avenue, NW, Roanoke, VA 24017

TRACT 40 tı UNALASKA **ISLAND** TRACT 40
AREA SUBJECT TO RESTRICTED LAND USE
DUE TO ENVIRONMENTAL CONTAMINATION NOTICE OF ENVIRONMENTAL CONTAMINATION RECORDING DISTRICT: ALEUTIAN DRIFTWOOD BAY, UNALASKA ISLAND, ALASKA

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ALASKA

2018 - 000147 - 0

Recording District 305 Aleutian Islands 04/19/2018 10:06 AM Page 1 of 2



NOTICE OF ENVIRONMENTAL CONTAMINATION

Recording District: Aleutian

As required by the Alaska Department of Environmental Conservation, Grantee, pursuant to 18 AAC 75.375 the U.S. Air Force, Grantor, as the owner of the subject property, hereby provides public notice that the property located at: Northing 1,211,987 feet, Easting 5,246,235 feet (Zone 10 Alaska State Plane), East of the Airfield Runway, Unalaska Island, Alaska, 99692, and more particularly described as follows:

T. 72 S., R. 119 W., Section 3, Tract 37, Seward Meridian

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AA 75, Article 3, as amended June 17, 2015. This release and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at http://www.dec.state.ak.us/spar/csp/db search.htm under Hazard ID number 96.

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment. ADEC determined, in accordance with 18 AAC 75.325 – 390 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though residual fuel contaminated soil and/or groundwater exists on-site. Further cleanup was determined to be impracticable as a result of findings generated documented in the Site Characterization Report for Driftwood Bay RRS, dated September 2009.

Attached is a site survey or diagram drawn to scale that shows the property boundaries, the area which was addressed during the 2015 Remedy Implementation at Site SS007, and locations of warning signs posted at the site.

Notification to the ADEC is required for approval prior to commencing any subsurface excavation or digging activities within the boundaries of Tract 37, as required by 18AAC 75.325(i). Any work/dig permit must comply with Pacific Air Force (PACAF) Center OI 32-7001 Land Use Control Management.

In the event that the remaining contaminated soil or groundwater becomes accessible by land use activities, or other information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator are required under 18 AAC 75.300 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 75.325-.390.

Pursuant to 18 AAC 75.325(i)(1) and (2), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-.370. At this site, in the future, if soil is removed from the site or groundwater is brought to the surface it must be characterized and managed following regulations applicable at that time.

Return To: Charlie Crawford, CES-Insight, 1701 Shenandoah Avenue, NW, Roanoke, VA 24017 Charlie Crawford CES-Insight

TRACT 37 to UNALASKA ISLAND 2 10 m TRACT 37
AREA SUBJECT TO RESTRICTED LAND USE
DUE TO ENVIRONMENTAL CONTAMINATION NOTICE OF ENVIRONMENTAL CONTAMINATION RECORDING DISTRICT: ALEUTIAN DRIFTWOOD BAY, UNALASKA ISLAND, ALASKA

2018 - 000148 - 0

Recording District 305 Aleutian Islands 04/19/2018 10:06 AM Page 1 of 2



NOTICE OF ENVIRONMENTAL CONTAMINATION

Recording District: Aleutian

As required by the Alaska Department of Environmental Conservation, Grantee, pursuant to 18 AAC 75.375 the U.S. Air Force, Grantor, as the owner of the subject property, hereby provides public notice that the property located at: Northing 1,207,773 feet, Easting 5,242,384 feet (Zone 10 Alaska State Plane), Along the road to High Camp, Unalaska Island, Alaska, 99692, and more particularly described as follows:

T. 72 S., R. 119 W., Section 4, 150 foot Air Force Right-of-Way, A034155, Seward Meridian

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AA 75, Article 3, as amended June 17, 2015. This release and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at http://www.dec.state.ak.us/spar/csp/db search.htm under Hazard ID number 131.

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment. ADEC determined, in accordance with 18 AAC 75.325 – 390 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though residual fuel contaminated soil and/or solvent contaminated groundwater exists on-site. Further cleanup was determined to be impracticable as a result of findings of the Site Characterization Report for Driftwood Bay RRS, dated September 2009.

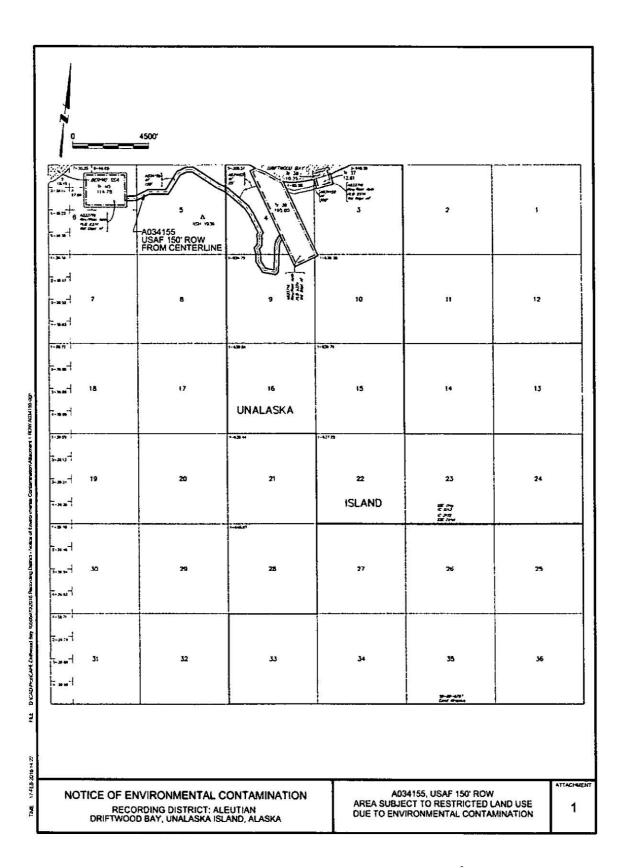
Attached is a site survey or diagram drawn to scale that shows the property boundaries, the area which was addressed during the 2015 Remedy Implementation at Site SS010, and locations of warning signs posted at the site.

Notification to the ADEC is required for approval prior to commencing any subsurface excavation or digging activities within the boundaries of Tract 38A and Tract 38B, as required by 18AAC 75.325(i). Any work/dig permit must comply with Pacific Air Force (PACAF) Center OI 32-7001 Land Use Control Management.

In the event that the remaining contaminated soil or groundwater becomes accessible by land use activities, or other information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator are required under 18 AAC 75.300 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 75.325-.390.

Pursuant to 18 AAC 75.325(i)(1) and (2), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-370. At this site, in the future, if soil is removed from the site or groundwater is brought to the surface it must be characterized and managed following regulations applicable at that time.

Return To: Charlie Crawford, CES-Insight 1701 Shenandoah Avenue, NW, Roanoke, VA 24017 Charlie Crawfor CES-Insight



APPENDIX D

COMMUNITY INVOLVEMENT MATERIALS

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CASE/PO/AIO: AHTNA ENGINEERING SERVICES, INC.

AD# or identifier: 31517

REMIT TO:

Anchorage Daily News 300 W 31st Ave Anchorage, AK 99503 Ph: (907) 257-4251

Fax: (907) 279-7579

INVOICE(S):

AFFIDAVIT O	F PUBLICATION
UNITED STATES OF AMERICA STATE OF ALASKA, THIRD DISTRICT BEFORE ME, THE UNDERSIGNED, A NOTARY PUBLIC THIS DAY PERSONALLY APPEARED Lisi Misa WHO, BEING FIRST DULY SWORN, ACCORDING TO LAW, SAYS THAT S/HE IS Legal Sales OF The Bristol Bay Times/Dutch Harbor Fisherman PUBLISHED AT 300 W 31 ST AVE, ANCHROAGE AK, IN SAID THIRD DISTRICT STATE OF ALASKA AND THAT THE ADVERTISEMENT, OF WHICH THE ANNEXED OR ATTACHED IS A TRUE COPY, WHICH WAS PUBLISHED IN SAID PUBLICATION The Bristol Bay Times/Dutch Harbor Fisherman AND THEREAFTER FOR A TOTAL OF 1 CONSECUTIVE ISSUE(S), THE LAST PUBLICATION APPEARING ON September 22, 2022.	ATTACH PROOF OF PUBLICATION HERE
SUBSCRIBED AND SWORN BEFORE ME THIS 26 th DAY OF September, 2022 JADA L NOWLING NOTARY PUBLIC STATE OF ALASKA MY COMMISSION EXPIRES ON JULY 24, 2024	

The reality and fantasy of life under totalitarianism

Truth is stranger than fic- Anchorage. Some stayed. tion. Or so we are told. But there are moments when fiction is stranger than truth - and on occasion, it is difficult to tell the difference between them.

Vassily Aksyonov's novel "The Burn" is autobiographical fiction. In the book, Aksyonov (1932-2009) writes about the Stalinist and post-Stalinist Soviet Union, but often his story gives way to hallucinatory nightmare.

During the 1930s, the Soviet security forces arrested his parents as dissident Troskyites and sent Aksyonov to an orphanage. The parents were shipped to Magadan in the Soviet far east, where for years they were political prisoners in varying forms of confinement.

Magadan, a city of more than 90,000, is well known to many Daily News readers. After Mikhail Gorbachev opened the Soviet far east to commerce and travel some 30 vears ago. Magadan residents and Alaskans went back and forth in an exploratory and at times celebratory mood.

In 1991, Magadan and Anchorage became sister cities. Young men and women of Magadan came to study in

After a few years in the orphanage, Aksyonov was reunited with his mother and allowed to live with her in Magadan. He describes Magadan of the early 1950s this way:

"The center of Magadan ... looked thoroughly respectable and, indeed, by the standards of the time, quite splendid; there were five-story buildings at the intersection of Stalin Prospect and Kolyma Highway, grocery stores. a pharmacy, a movie theater built by Japanese prisoners of war, a school built with large square windows, the large villa belongs to the boss of Dalstroy - the Far Eastern Construction Company — General Nikishov.

The Gornyak Movie Theater was especially important to Aksyonov the boy as it brought his imagination to life particularly John Wayne in "Stagecoach," a pirated version with an introductory text explaining that Soviet viewers would see American Indians valiantly struggling against white colonizers. John Wayne was, in this telling, a villain.

"It didn't matter that the audience's sympathies were inevitably enlisted against the



For the Bristol Bay Times Dutch Harbor Fisherman

freedom-loving Indians who peppered the little stagecoach with arrows, and they applauded the white colonizer. the Ringo Kid, who jumped from the roof of the coach onto the back of a horse and then at a gallop brought down two Apache warriors with his Winchester.

What was important was that the outward forms of propaganda were observed, and the spectator, willy-nilly, was supposed to have been given yet another dose of serum labeled 'struggle for national liberation.'

"For the seventh time, (the boy) had come to see how the Ringo Kid walked across the screen, how he sauntered with his long legs in those amazing cowboy pants, with those metal rivets, how he wiped the dust from his face. how he caught in the air the Winchester thrown to him by the sheriff, how he showed his white teeth in a slow, cautious smile, how he kissed a wom-

"A hero of incredible valor and holdness who would not think twice about giving his life for freedom! The Ringo Kid inspired the boy with selfassurance; he imagined seeing his tall figure on the streets of Magadan, and naturally, as he came out of the theater, he felt a little like the Ringo Kid him-

Askyonov, recast in the novel as young Tolya, has spent the afternoon in a fantasy, but he soon returns to the reality of the Soviet world. In the morning, on his way to school. he meets prisoners in chains shuffling along to work camps under armed guard.

Before long, Tolya's mother is rearrested and the two are separated again. The state security officer who comes to their house makes the arrest with efficient nastiness. mocking mother and boy. Before this hairy brute, Tolya is no longer the Ringo Kid but a helpless Soviet child in the hands of an all-powerful police state.

"His mother was being taken away to an unknown place, for an unknown reason. and for an unknown length of time," Aksyonov writes. This is the essence of a totalitarian government's power over its

The hairy state security officer appears later in the novel to sexually assault his grown daughter before giving her away in marriage to a member of the Soviet elite, a cosmonaut destined to circle the earth.

Conventional morality is a failure in Soviet Russia, and there is no social stability. What is permitted one day is banned the next and vice versa. People live in fantasy, particularly the fantasy of escape - to Paris, London, Rome for Muscovites and to Japan and Alaska for those in the far east. One Askyonov character actually escapes to Fairbanks where he winds up in a fictional navy hospital.

Throughout the novel, many characters are routinelv drunk. The pain of Soviet life must be dulled. If you are hung over on Tuesday and do not remember Monday, so much the better.

A reader of "The Burn" can be forgiven for confusing fact and fiction - just as the characters do.

Michael Carey is an occasional columnist and the former editorial page editor of the Anchorage Daily

HEUVEL

FROM PAGE 4

in-state issues - including, most significantly, fish. An Alaska Yup'ik Native, Peltola can point to a lifetime of fishing on the Kuskokwim River and boasts such professional titles as "Salmon Fellow." so she offered practical expertise about a resource that provides subsistence, sport and sales for her constituents.

And those constituents need help: Last year's salmon returns were down a whopping 87%, and rising water temperatures have meant more than 100 mass salmon die-offs in the state. Peltola cut through the intraparty squabbling of her opponents and became the definitive voice on an issue that mattered to her prospective constituents. Strong fish policy might not capture the imagination of out-of-state donors, but it took hold in a district that borders three oceans.

Third, Alaska's special election demonstrated the power of ranked-choice voting to pull a consensus candidate from the fray, Among first-choice votes. Peltola led the pack by nine points, but she crossed the critical 50% threshold thanks to people whose first choice was Begich - 29% of these voters crossed party lines to rank Peltola over Palin.

Despite what opponents of ranked-choice voting (a group that, no surprise, includes Palin and Begich) say, rankedchoice is good for democracy. It rewards candidates who build consensus instead of catering to their party's fringe and allows people to indicate support for multiple candidates instead of strategically voting based on (often inaccurate) perceptions about who is likely to win.

Thanks to efforts by advocates nationwide, the system is reaching more voters. According to the nonpartisan electoral reform organization FairVote, 55 cities, counties and states will adopt ranked-choice voting by their next election and a November ballot initiative could put Nevada on the path to doing so.

But the state's Democratic Party is mobilizing against the initiative - even though Democrats used rankedchoice voting themselves for the 2020 presidential caucus. Perhaps the party that has lately positioned itself as singularly committed to democracy ought to be more supportive of reforms that give

voters more control.

Ultimately, a politician succeeds by genuinely connecting on the issues that matter most to their community - like "pro-jobs, pro-fish, pro-family, and pro-choice" Peltola.

Katrina vanden Heuvel, editor and publisher of the Nation magazine, writes a weekly column for The Washington Post.

Public Notice

United States Air Force Environmental Restoration Program Five-Year Review

The Air Force Civil Engineer Center announces the beginning of the Five-Year Review process for Driftwood Bay Radio Relay Station (RRS), Alaska. This process will document whether the remedies implemented at Sites SS002 (Composite Building Landfill), SS007 (Former Fuel Storage Area at Beach), SS010 (Former Water Supply Pump House), LF006 (Old Disposal Area), and WP003 (POL Waste Pit) remain protective of human health and the environment. The remedy selected under Alaska State regulations for SS002, SS010, and WP003 is that of Institutional Controls (ICs), the remedy selected for SS007 is Monitored Natural Attenuation with ICs, and the remedy selected for LF006 is Offsite Disposal and ICs. This will be the second Five-Year Review for SS002, SS007, and SS010, and the first Five-Year Review for LF006 and WP003.

Reviews are conducted at least once every five years until contaminant levels allow unlimited use of the site and unrestricted exposure to the air, soil, and water. Detailed information concerning Driftwood Bay RRS cleanup efforts are available electronically on the Air Force Administrative Record at https://ar.afcec-cloud.af.mil/. Findings from the Five-Year Review will be placed on the Administrative Record website upon completion of the report.

Interested persons can participate in the Five-Year Review process through October 22, 2022, by responding to a questionnaire available from the following representative:

> Leslie Davis, Ahtna Solutions, LLC 714 4th Avenue, Suite 303 Fairbanks, AK 99701 ldavis@ahtna.net (907) 301-6992

Solutions to page 10 puzzles

3	1	4	9	2	7	8	5	6
7	9	2	6	5	8	1	4	3
8	5	6	4	1	3	7	2	9
1	6	7	3	8	2	5	9	4
9	8	3	5	6	4	2	7	1
2	4	5	1	7	9	3	6	8
4	2	9	7	3	1	6	8	5
5	7	1	8	4	6	9	3	2
6	3	8	2	9	5	4	1	7



APPENDIX E

INTERVIEW RECORDS

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	INTERVII	EW REC	CORD	
	Driftwoo	d Bay Ll	RRS	
Site Name: SS002, SS007,	SS010, LF006, WP00)3	EPA ID No.: AK3	570028644
Subject: 2022 Five Year R	eview		Time:	Date: 10/28/2022
Type: □ Telephone Location of Visit: n/a	□ Visit ⊠ E	Email		☐ Outgoing
	Contac	t Made By	7	
Name: Leslie Davis	Title: Deputy Project Manager		Organization: Ahtt	na Solutions, LLC
	Individu	al Contact	ed	
Name: Cascade Galasso	Title: Environmenta Program Specialist	al	Organization: ADI	EC
Telephone: 907-451-2181 Email: Cascade.galasso-iris	sh@alaska.gov		ldress: 610 Universit	·
-	SUMMARY OF	•	-	
What is your overall impress Positive. ICs, LUCs, and L				
Has the USAF reported on Yes.	the status of the ICs ar	nd LTM as	required?	
Do you know of any proble implementation or progress Access, remoteness, and we controls are sometimes miss erosion have compromised	at any of the sites? eather are difficulties a sing or weathered duri the integrity of the cap	at Driftwood ng annual so at the SS0	d Bay. Signs document site inspections. Burro 02 site, which underv	nting land use owing animals and went landfill repair in
2022. Road repair for top ca observed I the past to be ex			o erosion issues, and	site SS010 has been
Have any problems been en protectiveness and required				
In 2017, site LF006 was apprequirements for Land Use within 180 days, and warning records, an NEC was never implemented in a timely material ROD amendment to re-expetroleum contamination Corporation land, an Envact (UECA) with landow should be re-evaluated during the state of t	proved for Cleanup Co Control implementation ing signs to be placed a filed with ADNR, and inner. The remaining valuate the remedy, a at the site. Because ironmental Covenan orner concurrence is rearing the 2023 5YR.	omplete with on, and NEO at the proper of the ICs has contamined a Decisthe LF006 at (EC) under othe LF006 at (EC) under othe tothe	h Institutional Control C to be placed in the arty boundaries. Accorve been determined to ation present at the sion Document for site is located on Coler the United Envirolbe recorded with A	ols, with the ADNR records rding to ADEC to have not been site will require a the remaining Dunalashka ronmental Covenant ADNR. This site
Have there been routine conconducted by your office re Routine communication has report review.	garding the site? If so	, please giv	e purpose and results	S.

Have there been any complaints, violations, or other incidents related to the site requiring a response by your office? If so, please give details of the events and results of the responses.

No.

Do you have any general comments, suggestions, or recommendations regarding the management of these sites, remedy implementation, or ongoing work at the site?

See answer to question #4.

Do we have your permission to use your name in the Five-Year Review report and document the results of your interview in the report?

Yes.

INTERVIEW RECORD						
Driftwood Bay RRS						
Site Name: SS002, SS007,	SS010, LF006, WP00	13	EPA ID No.: AK35	70028644		
Subject: 2022 Five Year Re	eview		Time: n/a	Date: 11/3/2022		
Type: □ Telephone Location of Visit: n/a	□ Visit ⊠ E	Email		☐ Outgoing		
	Contac	t Made By	7			
Name: Leslie Davis	Title: Deputy Project Manager	et	Organization: Ahtna	a Solutions, LLC		
	Individu	al Contact	ed			
Name: Robert Johnston	Title: Remedial Pro Manager	ject	Organization: AFCI	EC/CZOP		
Telephone: 907-552-7193 Email: robert.johnston.17@	us.af.mil		ldress: 10471 20th St. PO Box 6898 te, Zip: JBER, AK 995			
	SUMMARY OF	CONVER	RSATION			
Are the ICs at Sites function yes	ning as expected?					
Do you know of any proble implementation or progress						
Have any problems been en Documents? no	countered that require	d, or will re	equire, changes to the I	RODs or Decision		
Are you aware of any comm details. no	nunity or contractor co	oncerns rega	arding these sites? If so	o, please give		
	Are you aware of any events, incidents, or activities at the sites such as vandalism, trespassing, or emergency responses from local authorities? If so, please give details. no					
Site SS002 and the roadway were the subjects of cap improvements and repairs. What is the current status of construction (e.g., percent complete and schedule)? The repair for SS002 is complete, Air Force is waiting for the report.						
Have any problems or difficulties been encountered which have impacted construction progress or implementability of repairs at SS002 and the roadway? no						
Do you have any general comments, suggestions, or recommendations regarding the management of these sites, remedy implementation, or ongoing work at the sites? No						
Do we have your permission results of your interview in	•	the Five-Yo	ear Review report and	document the		

Daga	$^{\circ}$	~f	$^{\circ}$
Page	_	OT	Z



Department of Environmental Conservation

SPILL PREVENTION & RESPONSE Contaminated Sites Program

> 610 University Avenue Fairbanks, Alaska 99709 Main: 907.451.2143 Fax: 907.451.2155 www.dec.alaska.gov

File No.: 2541.38.001

July 31, 2023

Robert Johnston AFCEC/CZOP 10471 20th Street, Suite 347 Elmendorf AFB, AK 99506-2201

Re: DEC Approval of the Final 2022 Five-Year Review for Sites SS002, SS007, SS010, and WP003 at Driftwood Bay Radio Relay Station, Alaska dated June 2023

Dear Mr. Johnston:

The Alaska Department of Environmental Conservation (DEC) Contaminated Sites Program (CSP) has reviewed the above-referenced final report, received on July 21, 2023. The report presents the evaluation of the implementation and performance of the remedies for sites SS002, SS007, SS010, and WP003 to determine if the remedy is, and will continue to be, protective of human health and the environment.

During this Five-Year Review period, Site LF006 was closed in the Contaminated Sites database without Institutional Controls and is no longer subject to five-year reviews. Additionally, this is the first review of Site WP003, as the remedy identified in the 2018 Institutional Control Plan was after the first five year review in 2018.

The four sites identified in this review are Active in the DEC Contaminated Sites Database. An Environmental Covenant or Notice of Activity and Use Limitations (NAUL) is required to be placed on the WP003 site to maintain the institutional controls (ICs) identified in the 2018 IC Plan, with a milestone date of this year: 2023. The ICs will need to document restrictions to groundwater and soil use.

Currently, the ICs are functioning as intended and there is no current exposure. However, DEC recommends an official Decision Document(s) are drafted for the sites included in this Five Year Review that document the remedy and ICs. Sites SS002, SS007, SS010, and WP003 do not have official Decision Documents. The remedies for these sites were determined through correspondence between the USAF and DEC and are documented in various reporting, including the *Remedy Implementation at the Former Driftwood Bay Radio Relay Station, Alaska (USAF, 2015)*, and the *ADEC Determination of Final Compliance for Driftwood Bay* letter (ADEC, 2010).

If you have any questions, please contact me at (907) 451-2181 or by email at <u>cascade.galasso-irish@alaska.gov</u>.

Sincerely,

Cas Galasso

Environmental Program Specialist

Enclosed: DEC Comments

Alaska Department of Environmental Conservation (DEC) Contaminated Sites Program

Document Name: Draft 2022 Five-Year Review for Sites SS002, SS007, SS010, and WP003

Driftwood Bay Radio Relay Station, Alaska

Commenters: Alaska Department of Environmental Conservation

Document Received by ADEC: February 16, 2023 **Date Comments Submitted:** April 17, 2023

#	Page	Section	ADEC Comment	Response	ADEC Response
	#				
1.	#	General	Note, all four of the sites included in this Five Year Review are currently listed as Active in the DEC Contaminated Sites database. In order to be Closed with Institutional Controls, the following must occur: • SS002 – provision of the geophysics report that defined the boundaries of the landfill and surveyed the landfill boundaries, per remedy selection. See comment 5. • SS007 – Continued MNA and trend analysis to document whether the DRO plume in groundwater is shrinking and the concentrations are decreasing. *Note, 2021 sampling results were below Table C. If subsequent sampling results continue to show concentrations remain below Table C groundwater CULs, this would support site closure without ICs and unrestricted use/unlimited exposure (UU/UE). • SS010 – This site has been recommended	Acknowledged. Site status has been included in the Introduction section.	USAF Clarification 6.24.23: For SS002, the geophysics report was an investigative recommendation made in the 2005 PA/SI, and not a remedy. This was incorrectly referenced as the remedy document in previous FYRs and LTM reports. The current FYR has been revised to reflect the remedy consists of ICs and IC/landfill cap maintenance and inspections, consistent with the recommendation made in the 2005 PA/SI report. The IC were identified in the <i>Remedy Implementation at the Former Driftwood Bay Radio Relay Station</i> ,
			by the CS PM to DEC management for Cleanup Complete-ICs. Approval requires an Environmental Program Manager 3 approval due to contamination remaining		Alaska (USAF, 2015). 7/24/2023 DEC Response: A. DEC strongly recommends the ICs are documented in a Decision

			at the site above promulgated cleanup levels. • WP003 – Verification of a NEC filed with ADNR. Alternatively, a recorded Environmental Covenant, or Notice of Activity and Land Use recorded with ADNR; and verification of appropriate signage placed at the site. See comments # 7 and #12.		Document for the sites included in the FYRs.
2.		General	The Air Force has been performing PA/SI's at non-AFFF source area sites; des the Air Force intend to investigate Driftwood Bay for potential PFAS impacts?	Yes, the USAF does intend to investigate Driftwood Bay for potential PFAS impacts.	A
3.	3	Site SS007 (CS Hazard ID 96)	Are there any records of the 25,000 -gallon gasoline AST having an AFFF fire suppression system?	There are no records of a fire suppression system associated with the AST.	A
4.	4	Site WP003 (CS Hazard ID 90)	It appears WP003 was never sampled for PCBs, although PCBs were included in the analyses of many of the other sites at Driftwood Bay. Waste pit floor drains receive a wide variety of contamination. What is the reasoning PCBs were not investigated at WP003?	PCBs were investigated during the 2005 PA/SI at WP003, four soil samples were collected around the floor drainpipe outfall. PCBs were not detected. (USAF, 2005) Reference to the report has been added to the WO003 site description	A
5.	7	Table 1	Add groundwater to the medium for Site SS007 in Table 1	Corrected. Thank you.	A
6.	9	Remedial Action Objectives	Of note, the site-specific cleanup levels RAOs referenced from the 2013 ROD for LF006 are outdated. The LF006 site is closed, therefore the RAO's do not depict the most current State Cleanup Levels. Please clarify this in the text.	Acknowledge. The following text was added: "The RAO site-specific cleanup levels referenced above do not depict the most current cleanup levels, however the Cleanup Complete with ICs determination was made in consideration of the	Clarification. LF006 is Cleanup Complete without ICs. Recommend revising the text to: "The RAO site-specific cleanup levels referenced above do not depict the most current cleanup levels, however the Cleanup Complete determination was made

				promogulated soil cleanup levels (ADEC, 2022d)."	in consideration of the promogulated soil cleanup levels (ADEC, 2022d)." USAF; 6.24.23: Corrected, thank you.
7.	27	Status of Implementation – WP003 Protectiveness Statement – WP003	In February 2018, an IC Plan was developed for WP003 that included the following elements: • LUCs for the site are incorporated into the 611th Civil Engineering Squadron LUC Management Plan. • A Notice of Environmental Contamination (NEC) will be placed in the Alaska Department of Natural Resources' (ADNR's) land records no later than 31 March 2020. • Warning signs will be placed at the extent of the site to provide contact information for LUC Management no later than 31 October 2019. The signage will be implemented and maintained by the 611 CES. According to DEC records, there is no existing NEC for site WP003. The protectiveness statement on page 27 for Site WP003 states: "For long-term protection, an NEC is required to be filed with the ADNR's Aleutian Island Recording District." Due to the promulgation of the Uniform Environmental Covenant Act (UECA) in 2018, NECs are no longer used to record LUCs. An Environmental Covenant or Notice of Activity and Use Limitations (NAUL) will need to be placed on the property to maintain the ICs identified in the 2018 IC Plan. The ICs will need to document restrictions to groundwater and soil use.	Acknowledged. Discussion of WP003 NEC has been revised to reference NAULs in Section VI, Issues and Recommendations table, and the Protectiveness Statement.	A An Environmental Covenant or Notice of Activity and Use Limitations (NAUL) will be placed on the property to maintain the ICs identified in the 2018 IC Plan, with a milestone date of 2023. The ICs will need to document restrictions to groundwater and soil use.

8.	10, 11, 13	Selected Remedy Status of Implementation	Additionally, see comment #6 regarding warning signs at the WP003 site to document the location of residual contamination. For statements that identify the site remedy under state law, revise 'state law' to cite the appropriate document with the ICs established. For example, in the Selected Remedy section for SS002 on page 10, revise "The remedy selected under state law for Site SS002 was ICs," to "The remedy selected for Site SS002 per the 2010 ADEC Determination of Final Compliance for Driftwood Bay Radio Relay Station (RRS) Sites is ICs. See pages 10, 11 and 13.	The specific sentences have been revised as requested.	A
9.	10	Selected Remedy – SS002	The ICs listed for Site SS002 include using geophysics to better define the boundaries of the landfill and survey the landfill boundaries. Did this ever occur? If so, please cite the document. DEC does not have record of this occurring, therefore the site is active in the Contaminated Sites database. If this has not occurred, the ICs are not functioning as intended.	The geophysical and geophysics survey report was included as Appendix D in the 2009 Site Characterization Report. Reference to the report and the citation has been added to Status of Implementation Section.	DEC's copy of the 2009 Site Characterization Report is missing Appendix D. Please provide the geophysical and geophysics survey report for SS002. USAF Clarification, 6.24.23: The geophysical survey in the 2009 Site Characterization report was for a different Driftwood Bay site. This reference was removed from the Status of Implementation Section. However, the geophysics report was an investigative recommendation made in the 2005 PA/SI, and not an IC remedy. (please see comment #1 clarification). Survey of the landfill boundaries was documented in the

					2015 Final Institutional Controls Report, dated April 2016. ICs including. All ICs (LUCMP, NEC, and warning signs) have been implemented and are functioning. 7/24/2023 DEC Response: A DEC strongly recommends the ICs are documented in a Decision Document for the sites included in the FYRs.
10	. 18	Data Review – SS007	This section discusses groundwater samples collected at Site SS007 in 2017, 2019, and 2021. According to the <i>Final 2021 Land Use/Institutional Controls and Long-Term Management Report</i> dated June 2022, groundwater sampling was also conducted in 2022. Did this sampling event occur as planned? If so, and if the event is intended to be included in the 3 rd FYR rather than this review, recommend adding a statement to this section that groundwater sampling was also conducted in 2022 and will be included in the next FYR. If this sampling event did not occur, please provide an approximate schedule for the groundwater monitoring at Site SS007.	Groundwater sampling was conducted as part of the 2022 LTM, however the report/data is not available during this FYR reporting period. This text was added to the SS007 data review section: "Results of the 2022 Groundwater sampling and will be included in the next FYR."	A
11	. 19	Site Inspections	Statement: "Multiple attempts were made to access the Driftwood site during the reporting period of this FYR (September through October, 2022). However, due to weather conditions, travel attempts by both air and boat were unsuccessful. To meet the FYR reporting deadline in June 2023, the most recent site visit performed in summer 2022, as well as site inspection summaries from the 2017–2021	The most recent site visit in 2022 referenced in this FYR refers to the SS002 Landfill Cap repair. Text has been added to clarify	A

			LUC/IC LTM program, are the basis for assessing whether the remedies remain protective." Please clarify, was the most recent site visit performed in summer 2022 LTM activities at the sites included in this 5YR? Or is this site visit referencing the SS002 Landfill Cap repair activities?		
12.	. 21	Site Inspections – WP003	Statement: "LUCs are functioning as intended as there are no signs of excavation or soil disturbance. However, there is currently no visible warning signage present at WP003." The Final 2021 Land Use/Institutional Controls and Long-Term Management Report dated June 2022 states: "One replacement sign was installed that addressed both SS002 and WP003." Please clarify. If there is no visible warning signage present at WP003, the LUCs are not functioning as intended.	The initial statement was made in error. Text has been revised to reflect the replacement sign installed in 2021. Thank you. "During 2021 LTM activities a new warning sign was installed at the site on an existing metal pole, facing east at the end of the road, east of the site."	A
13.	. 23	Section V, Question A	Statement: "At the discretion of the USAF, MNA of DRO concentrations is being performed to show that concentrations are below the ADEC cleanup level for three consecutive monitoring events, thus achieving a Cleanup Complete designation without the ICs requirement." The 'three consecutive monitoring events,' while sometimes used on a site-by-site basis to evaluate plume stability, is not regulation. Recommend revising language to be consistent with the Final reporting requirements and site closure in 18 AAC 75.380 (c)(2): "The department will determine final compliance with the groundwater cleanup levels' 'the department will determine compliance based on the	Acknowledge. The statement has been revised to "At the discretion of the USAF, MNA of DRO concentrations is being performed to provide additional data to document site conditions meet the criteria for site closure with ICs, as document in 18 AAC 75.380 (c)(2). If sampling results continue to show concentrations remain below Table C groundwater cleanup levels, this would support site closure without ICs and UU/UE."	A

	maximum concentrations of a hazardous substance detected in the final confirmation samples; before closure, the size of the dissolved plume must be steady state or shrinking and concentrations of the hazardous substance must be decreasing."	
14.	End of comments	



DEPARTMENT OF THE ARMY U.S. ARMY CORPS OF ENGINEERS, ALASKA DISTRICT P.O. BOX 6898 JBER. AK 99506-0898

MAY 28, 2024

Bill Homka Secretary Unalaska Preservation Commission 43 Raven Way Unalaska, AK 99685

Dear Mr. Homka:

In July 2023, the U.S. Army Corps of Engineers, Alaska District (USACE) coordinated with you regarding investigation and cleanup actions planned for this summer at Little South America (Hill 400) on Amaknak Island, Unalaska, under the Formerly Used Defense Sites Program. USACE concluded that the proposed undertaking would have no adverse effect on historic properties. Recent changes to the undertaking from what was proposed in our original assessment have resulted in a change to our original finding. USACE now believes that the undertaking at the Latrine 1 will cause an adverse effect to the feature.

You are receiving this letter because we believe that the Unalaska Preservation Commission has an interest in cultural resources in the project area and USACE wishes to consult with you regarding resolved the adverse impact to the Latrine 1 feature at Little South America. A letter addressed to the Alaska State Historic Preservation Officer (SHPO), which assesses the proposed undertaking, is enclosed. It describes the present state of evaluation of cultural resources in the area, and the impact that the proposed undertaking may have on those resources. This letter will be followed up by a meeting invite to discuss mitigation measures to resolve the proposed impacts.

If you have questions or concerns about this project, or would like to share information with us, please email Forrest Kranda at forrest.j.kranda@usace.army.mil or call at 907-753-2736.

Sincerely,

Forrest J. Kranda Archaeologist

Environmental and Special Programs



DEPARTMENT OF THE ARMY U.S. ARMY CORPS OF ENGINEERS, ALASKA DISTRICT P.O. ROY 6898

P.O. BOX 6898 JBER, AK 99506-0898

May 28, 2024

CEPOA-PME

Ms. Judith Bittner State Historic Preservation Officer Office of History and Archaeology 550 West 7th Avenue, Suite 1310 Anchorage, AK 99501-3565

Dear Ms. Bittner:

On July 18, 2023, the U.S. Army Corps of Engineers, Alaska District (USACE) coordinated with your office regarding investigation and cleanup actions planned for 2024 at Little South America (Hill 400) on Amaknak Island, Unalaska, under the Formerly Used Defense Sites (FUDS) Program (Figure 1). USACE concluded that the proposed undertaking would have no adverse effect on historic properties (USACE 2023). On August 14, 2023, the National Park Service concurred with this assessment, and on August 17, 2023, your office also concurred that the undertaking would have no adverse effect (SHPO 2023; NPS 2023). USACE recently determined that the proposed action at the Latrine 1 site on Little South America identified in our previous consultation will be adversely impacted by the cleanup effort. The purpose of this letter is to notify you of changes to the undertaking from what was proposed in our original assessment, present a finding of adverse impact, and request to enter into a Memorandum of Agreement (MOA) to resolve the impacts.

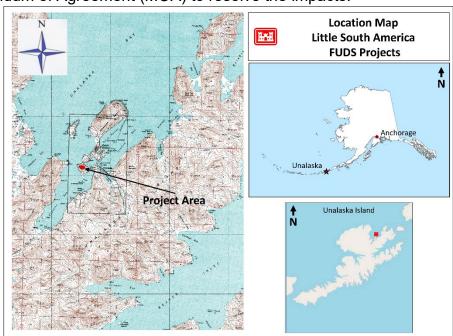


Figure 1. Project area at Little south America, Amaknak Island.

Changes to Project Description

The undertaking at Latrine 1 at Little South America as proposed in 2023 included the following actions: Removal of soil impacted by petroleum, oil, and lubricants (POL) and installation three temporary groundwater monitoring wells for groundwater sampling. As shown in Figure 7 of the original assessment letter (USACE 2023), the contaminated soil was previously thought to occur southeast of the Latrine 1 building footprint. However, soil samples collected in April 2024 indicate that POL-contaminated soil extends west into the building footprint itself. The field work for project has been pushed to occur in the late summer of 2024 or to the spring and summer of 2025.

Changes to Assessment of Effect

It is now thought that the plume of POL-contaminated soil extends under the Latrine 1 building footprint (Figure 2). The building footprint consists of a concrete foundation and partial wooden floor covered with collapsed metal Quonset hut joists, fragments of metal siding, and debris associated with the building's original function (e.g., sink, water heater). POL contamination is likely to extend under the Latrine 1 footprint and, to achieve proposed cleanup levels, removal of the footprint and its collapsed structural debris and materials will be necessary.



Figure 2. Overview of Latrine 1 building footprint, view SW (Eldridge 2016).

Table 1. Anticipated impacts to specific historic properties and structures. Changes from previous coordination noted with dark gray highlights.

AHRS#	AHRS Site Name	Impacted Structure	Impact
UNL-00120	Dutch Harbor NOB and Fort Mears US Army NHL	Latrine 1	Adverse Effect
UNL-00122	Hill 400 Defense Site	Latrine 1	Adverse Effect

Conclusion

Considering the changes to the undertaking noted above, USACE believes that the proposed undertaking will adversely affect Latrine 1, which is within the boundaries of the Dutch Harbor NOB and Fort Mears U.S. Army NHL (UNL-00120) and the Hill 400 Defense Site (UNL-00122), and that mitigation to resolve the adverse effects would be appropriate per 36 CFR 800 5.b. If you have any questions about the changes to this undertaking, please contact me by phone at 907-753-2736, or by email at forrest.j.kranda@usace.army.mil.

Sincerely,

Forrest J. Kranda Archaeologist

Environmental and Special Program

cc:

Anfesia Tutiakoff, Cultural Manager, Qawalangin Tribe of Unalaska Laresa Syverson, Technical Lands Manager, Ounalashka Corporation Denise Rankin, President, Ounalashka Corporation Thomas Rufos, Associate Planner, Unalaska Planning Commission Bill Homka, Secretary, Unalaska Preservation Commission Virginia Hatfield, Director, Museum of the Aleutians Karen Pletnikoff, Environmental and Safety Program Manager, APIA, Inc. Ben Leon-Guerrero, Lands Manager, Aleut Corporation Janet Clemens, Regional Historian, National Park Service

References

National Park Service (NPS)

2023. Letter to USACE (Forrest Kranda) from NPS (Jennifer Pederson Weinberger) re: USACE proposed environmental remediation and soil sampling Unalaska area. File No. 1.B (AKRO-CR). August 14, 2023.

State Historic Preservation Officer (SHPO)

2023. Letter to USACE (Forrest Kranda) from SHPO (Judith Bittner) re: USACE proposed environmental remediation and soil sampling in the Unalaska area. File No. 3130-1R COE-E/2023-00866. August 17, 2023.

US Army Corps of Engineers (USACE)

2023. Letter to SHPO (Judith Bittner) from USACE (Forrest Kranda) re: USACE proposed environmental remediation and soil sampling in the Unalaska area July 18, 2023.

The Section 106 Consultation Process and Mitigation of Adverse Effects

Kelly A. Eldridge, Archaeologist Formerly Used Defense Sites (FUDS) Program U.S. Army Corps of Engineers, Alaska District

City of Unalaska Historic Preservation Commission Meeting June 20, 2024







Section 106 of the National Historic Preservation Act: The <u>Purpose</u>

"Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings... The section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of project planning. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties" (36 CFR § 800.1(a)).

"The agency official must complete the section 106 process 'prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license.' This does not prohibit agency official from conducting or authorizing nondestructive project planning activities before completing compliance with section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties" (36 CFR § 800.1(c)).

Section 106 of the National Historic Preservation Act: The Process

The Federal agency must:

- Step 1) Identify the undertaking and determine whether it is a type of activity that has the potential to affect historic properties
- Step 2) Determine the Area of Potential Effect (APE)
- Step 3) Identify cultural resources and historic properties within the APE
- Step 4) Determine whether any cultural resources are historic properties
- Step 5) Assess the effect of the undertaking on historic properties
- Step 6) If there will be an adverse effect on historic properties, work with stakeholders to identify ways to minimize impacts or resolve the adverse effect through mitigation

 Packet Page 106

Section 106 of the National Historic Preservation Act: The Stakeholders

"The agency official shall involve the **consulting parties**... in findings and determinations made during the section 106 process. The agency official should plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement..." (36 CFR § 800.2(a)(4)).

- 36 CFR 800.2(c) identifies "consulting parties" as:
 - State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO)
 - "Indian Tribes" and Native Hawaiian Organizations
 - Representatives of local governments
 - Applicants for Federal assistance, permits, licenses, and other approvals (if undertaking = assistance, permits, licenses, or other approvals)
 - Individuals and organizations with a demonstrated interest in the undertaking due to their concern with the undertaking's effects on historic properties

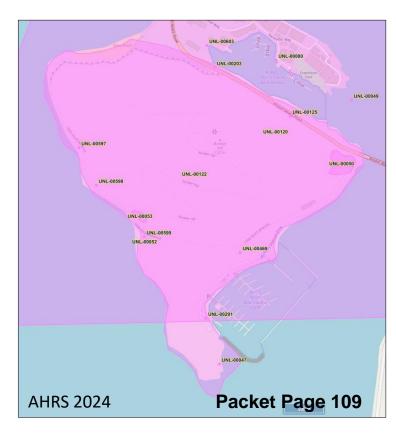
The agency shall also "seek and consider the views of **the public** in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties, the likely interest of the public in the effects on historic properties, confidentiality concerns of private individuals and businesses, and the relationship of the Federal involvement to the undertaking" (36 CFR § 800.2(d)).

Example of Steps **1** and **2** of Section 106 Process: Location of Amaknak FUDS Cleanup Actions that could Affect Historic Properties

- Latrine 1 Underground Storage Tank (UST) on Hill 400
 - Remove soil contaminated with petroleum, oil, and lubricants (POL)
 - Collect soil samples
 - Install temporary groundwater monitoring wells and collect water samples
- Former Mess Hall (Building 1154) on Hill 400
 - Install temporary groundwater monitoring wells and collect water samples
- Former Powerplant UST at Humpy Cove
 - Remove POL-contaminated soil
 - Collect soil samples
 - Install temporary groundwater monitoring wells and collect water samples

Example of Steps **3** and **4** of Section 106 Process: Historic Properties associated with the Amaknak FUDS Cleanup

- Dutch Harbor Naval Operating Base (NOB) & Fort Mears, U.S. Army, National Historic Landmark (NHL)
 - Alaska Heritage Resources Survey (AHRS) #: UNL-00120
 - Nominated by NPS in 1984 and Listed as an NHL by the Keeper in 1985
 - Period of Significance: 1940–1945
 - Landowner: Multiple
- Hill 400 Defense Site [Bunker Hill, Little South America]
 - AHRS #: UNL-00122
 - Determined to be a contributing property to the NHL by NPS in 1984
 - Landowner: Ounalashka Corporation



Example of Step **5** of the Section 106 Process: Consultation on Assessment of Effect – Amaknak FUDS Cleanup

- July 18, 2023 [all locations]
 - USACE submitted an Assessment of **No Adverse Effect** for the FUDS Cleanup at the proposed undertaking:
 - Alaska State Historic Preservation Officer (SHPO)
 - National Park Service, Alaska Region (NPS)
 - Qawalangin Tribe of Unalaska
 - Ounalashka Corporation
 - Unalaska Planning Commission
 - Unalaska Preservation Commission
 - Museum of the Aleutians
 - Aleutian Pribilof Islands Association, Inc.
 - Aleut Corporation
- August 14, 2023 [all locations]
 - NPS agreed that the undertaking would not have an adverse effect on the NHL with the understanding that off-road fieldwork will be guided by an archaeologist, and, upon completion of fieldwork, the area will be restored to its pre-existing conditions including backfilling with clean soil, contouring to match the surrounding grade and existing drainage, and reseeding.
- August 17, 2023 [all locations]
 - **SHPO concurred** with the finding of no adverse effect contingent on minimization measures including the fieldwork being guided by an archaeologist and, upon completion of fieldwork, the ground surfaces will be restored back to their pre-existing conditions.

Example of Step **5** of the Section 106 Process: Reinitiation of Consultation on Assessment of Effect – Amaknak FUDS Cleanup

- May 28, 2024 [Hill 400 Latrine 1]
 - USACE **submitted an Amendment** to the original Assessment that notified stakeholders of changes to the undertaking at Latrine 1, presented a **Finding of Adverse Effect**, and requested development of an MOA to resolve impacts.
- May 28, 2024 [Hill 400 Latrine 1]
 - NPS agreed to participate in the development of an MOA to resolve the adverse effect on the NHL.
- June 1, 2024 [Hill 400 Latrine 1]
 - USACE submitted an e106 document to the Advisory Council on Historic Preservation (ACHP) regarding an adverse effect on an NHL
- June 13, 2024 [Hill 400 Latrine 1]
 - **SHPO concurred** with the finding of adverse effect and agreed to continue consultation with USACE and other consulting parties to resolve the adverse effect through the development of an MOA.



Step **6** of the Section 106 Process: Resolution of Adverse Effects

"The agency official shall consult with the SHPO/THPO and other consulting parties... to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties" (36 CFR § 800.6(a)).

If avoidance or minimization is not possible, then mitigation can be identified in:

- Memorandum of Agreement (MOA)
- Programmatic Agreement (PA)

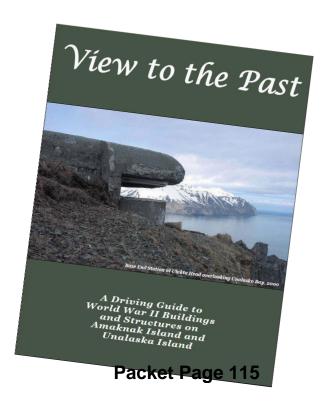
Step **6** of the Section 106 Process: Resolution of Adverse Effects from Post-Review Discoveries

"If historic properties are discovered or unanticipated effects on historic properties found after the agency official has completed the section 106 process... the agency official shall make reasonable efforts to avoid, minimize or mitigate adverse effects to such properties" (36 CFR § 800.13(b)).

- If actions with potential to affect have **not** started:
 - Agency must work with consulting parties to develop an MOA or PA that will identify appropriate mitigation.
- If actions with potential to affect **have** already started:
 - Actions impacting the historic property must stop.
 - Agency must consult on an expedited timeline
 - Once appropriate mitigation has occurred, actions may resume.

Examples of Previous USACE Mitigation of Adverse Effects on WWII Sites

- Historic Building Condition Assessments [1998 PA]
- Historic American Building Survey (HABS) Documentation [2008 MOA, 2017 MOA]
- Historic American Engineering Record (HAER) Documentation [2014 MOA]
- Booklets on the WWII History a Location [2002 MOA, 2008 MOA, 2013 MOA]
- Environmental Restoration Lessons Learned Booklet [2000 PA]
- Interpretive Panels [2003 PA, 2022 MOA]
- Driving Guides [2000 PA]
- Scaled Drawings, Maps, and Photographs of WWII-era Building Remnants [2017 MOA, 2021 MOA]
- Reproductions of historical As-Built Maps and historical Photographs for Consulting Parties [2021 MOA]



Questions?



2 Examples of Mitigation of Adverse Effect:

- 1. WW2 Torpedo and Bomb Sight Workshop in Unalaska
- 2. Alaska Mental Health Trust Land



Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION OFFICE OF HISTORY AND ARCHAEOLOGY

550 West 7th Avenue, Suite 1310 Anchorage, AK 99501-3565 Main: 907.269.8721 Fax: 907.269.8908

December 4, 2014

File No.:

3490 FAA Torpedo Building

Leslie Grey
Lead Environmental Protection Specialist
Federal Aviation Administration
Alaska Region Airports Division
222 W 7th Avenue, Box #14
Anchorage, Alaska 99513-7587

Subject: Demolition of the Torpedo Bombsight & Utility Shop

Dear Ms. Grey:

The Alaska State Historic Preservation Office (AK SHPO) received your correspondence on December 2, 2014.

We have reviewed the subject MOA and find it to be satisfactory. We have signed the one copy of the signature page provided for the Memorandum of Agreement Among the Federal Aviation Administration, Alaska Department of Transportation and Public Facilities, and the State Historic Preservation Officer Pursuant to 36 CFR Part 800.6(c) Regarding the Unalaska Airport Safety Improvements Project (Demolition of the Torpedo Bombsight & Utility Shop), Unalaska, Alaska and are returning one copy to you for your records. We have retained a fully executed copy for our records.

Thank you for the opportunity to comment. Please contact Shina duVall at 269-8720 or shina.duvall@alaska.gov if you have any questions or if we can be of further assistance.

Sincerely,

Judith E. Bittner

State Historic Preservation Officer

JEB:sad

MEMORANDUM OF AGREEMENT AMONG THE FEDERAL AVIATION ADMINISTRATION, ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES, AND THE STATE HISTORIC PRESERVATION OFFICER PURSUANT TO 36 CFR PART 800.6(C) REGARDING THE UNALASKA AIRPORT SAFETY IMPROVEMENTS PROJECT (DEMOLITION OF THE TORPEDO BOMBSIGHT & UTILITY SHOP), UNALASKA, ALASKA

WHEREAS, the Alaska Department of Transportation & Public Facilities (DOT&PF) is the owner and operator of the Unalaska Airport in Unalaska, Alaska; and

WHEREAS, the DOT&PF proposes to demolish the World War II-era Torpedo Bombsight & Utility Shop (Torpedo Building) located on the Unalaska Airport property due to immediate life safety issues; and

WHEREAS, the Alaskan Region Airports Division of the Federal Aviation Administration (FAA) is the lead federal agency overseeing the demolition of the Torpedo Building; and

WHEREAS, the Torpedo Building is a contributing property to the Dutch Harbor Naval Operating Base & Fort Mears National Historic Landmark (NHL), and therefore a historic property; and

WHEREAS, the Unalaska Airport property is located within the Dutch Harbor Naval Operating Base & Fort Mears NHL; and

WHEREAS, the demolition of the Torpedo Building is defined as the Undertaking, and

WHEREAS, FAA has consulted with the State Historic Preservation Officer pursuant to the National Historic Preservation Act (NHPA) (16 USC 470s) and 36 CFR 800; and

WHEREAS, FAA invited the Advisory Council on Historic Preservation (ACHP) to Participate and they chose not to be a party to the Memorandum of Agreement; and

WHEREAS, FAA determined, and SHPO concurred, that the Undertaking will have an adverse effect on the Torpedo Building and the Dutch Harbor Naval Operating Base & Fort Mears NHL; and

WHEREAS, the Torpedo Building has been sufficiently documented and no further recordation is required; and

WHEREAS, FAA consulted with the National Park Service—Alaska Region (NPS), the Ounalaska Corporation, the Unalaska Historic Preservation Commission, and the Qawalangin Tribe of Unalaska in pursuant to 36 CFR 800.2(c)(2); and

WHEREAS, NPS has accepted this invitation and will participate as a Concurring Party; and

WHEREAS, FAA and SHPO are Signatories to this Agreement; and

WHEREAS, DOT&PF, as the owner and operator of the Airport and sponsor of the Undertaking, is signing this MOA as an Invited Signatory, and

WHEREAS, the DOT&PF will notify all consulting parties prior to and at the completion of the Undertaking;

NOW THEREFORE, FAA, SHPO and DOT&PF (collectively "Signatories") agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on historic properties.

STIPULATIONS

The FAA, in coordination with the DOT&PF, shall ensure that the following measures are implemented:

I. MITIGATION MEASURES

- A. Development of Design and Maintenance Guidelines
 - a. DOT&PF shall ensure design and maintenance guidelines are developed for the remaining contributing properties of the Dutch Harbor Naval Operating Base & Fort Mears NHL on DOT&PF property.
 - b. The following contributing properties located on DOT&PF property will be addressed in the guidelines: Hangar (310), Aerology Building (417), Receiving Warehouse (429), Naval Air Transport Service Warehouse (421), Revetments at base of Mount Ballyhoo, and any additional features associated with the NHL (to be clarified through development of the guidelines).
 - c. Purpose: the intended purpose of these guidelines is to aid DOT&PF in the stewardship of historic properties on the DOT&PF-owned facility.
- B. Interpretive Display
 - a. DOT&PF shall produce an interpretive display that describes the historic function of the Torpedo Building.
 - b. The design and placement of the display shall be developed in consultation with the SHPO and NPS.
 - c. The content of the display will compliment other World War II-era interpretive displays included in the NHL to ensure new information is available to the public and avoid redundancy.

II. DELIVERABLES

- A. Development of Design and Maintenance Guidelines
 - a. Draft Guidelines will be submitted to FAA, SHPO and NPS for review within 12 months of when the demolition is complete. Upon receipt of the draft, FAA, SHPO and NPS will have thirty (30) calendar days to review and provide comments.
 - b. Final Guidelines taking into consideration comments from SHPO and NPS shall be submitted within forty-five (45) days after receipt of review comments.
- B. Interpretive Display

- a. DOT&PF shall meet with FAA, SHPO, and NPS to discuss the design and placement of display within three (3) months of when the demolition is complete.
- b. Upon agreement of the Signatories, DOT&PF shall submit the draft interpretive display within 18 months of when the demolition is complete
- c. FAA, SHPO and NPS will have thirty (30) days from receipt of the submittal to review and comment.
- d. Final interpretive display design shall take into consideration comments from FAA, SHPO and NPS and shall be submitted within sixty (60) days after receipt of review comments.
- e. Upon completion of installation of interpretive display, DOT&PF shall photograph the site and send the documentation to FAA, SHPO and NPS.

III. PROFESSIONAL STANDARDS

All work pursuant to this MOA will be developed by or under the supervision of a person or persons with appropriate professional qualifications. Architectural Historians employed to implement the stipulations of this agreement shall meet the professional qualifications included in Secretary of the Interior's Historic Preservation Professional Qualification Standards (36 CFR 61, Appendix A).

IV. INADVERTENT DISCOVERIES

If, during the implementation of the undertaking, a previously unidentified property is encountered, or a previously identified historic property is affected in an unanticipated manner, FAA shall notify SHPO, and other consulting parties as appropriate, within seventy-two (72) hours. FAA will ensure that work shall cease in the area of the discovery until the unanticipated effect can be evaluated, and an appropriate treatment plan consistent with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716) is developed and agreed upon by SHPO. FAA shall ensure that the treatment plan is implemented.

V. DISPUTE RESOLUTION

Should any Signatory to this agreement object within thirty (30) days from receipt to any plans, specifications, or actions proposed pursuant to this MOA, FAA shall consult with the objecting party to resolve the objection.

VI. AMENDMENT

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment shall be effective on the date of the signature by the final Signatory.

VII. DURATION

This MOA shall become effective upon execution by the signatories to this MOA and shall remain in effect until all measures provided for are completed or until five (5) years after it becomes effective.

VIII. TERMINATION

SIGNATORIES

Any Signatory to this MOA may terminate it by providing thirty (30) days notice to the other Signatories. The Signatories will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination.

EXECUTION AND IMPLEMENTATION of this MOA evidences that FAA has consulted with the SHPO and other consulting parties on the Unalaska Airport Safety Improvements Project and has taken into account the projects effects on historic properties in accordance with its Section 106 responsibilities.

FEDERAL AVIATION ADMINISTRATION	
By: W. Janes. GorByron Huffman, Alaskan Region Airports Division Manag	Date: $\frac{12}{2}/\frac{14}{14}$
STATE HISTORIC PRESERVATION OFFICER	
By: Judith Bittner, State Historic Preservation Officer	Date: 12/5/14
INVITED SIGNATORIES	
DEPARTMENT OF TRANSPORATION AND PUBLIC FACILI By: Robert Campbell, Regional Director	TIES Date: 11.7); 14
CONCURRING PARTIES	
NATIONAL PARK SERVICE – ALASKA REGION	
By:Bert Frost, Regional Director	Date:

AMENDMENT TO

PROGRAMMATIC AGREEMENT

AMONG

THE USDA FOREST SERVICE, TONGASS NATIONAL FOREST,

THE ALASKA STATE HISTORIC PRESERVATION OFFICER,

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND

THE ALASKA MENTAL HEALTH TRUST LAND OFFICE

REGARDING

LAND EXCHANGE BETWEEN THE TONGASS NATIONAL FOREST AND THE STATE OF ALASKA MENTAL HEALTH TRUST LAND OFFICE

WHEREAS, the Agreement was executed on April 16, 2018;

WHEREAS, the USDA Forest Service (Forest Service) has determined that the identified effects to CRG-00346 Wolf Creek Boatworks are different than those anticipated as part of the original Agreement; and

WHEREAS, the Forest Service has invited Samuel Romey, the current owner of CRG-00346 Wolf Creek Boatworks improvements, to consult on the resolution of adverse effect to the property and he has chosen to participate; and

WHEREAS, approximately one-third of the CRG-00346 Wolf Creek Boatworks shop building sits on National Forest System lands and the other two-thirds of the building sits below mean high tide on State of Alaska land; and

WHEREAS, Mr. Romey's permit expired on its own terms on December 31, 2015 and the Forest Service notified Mr. Romey that he is required to remove his property, including his facilities, and vacate the land by December 15, 2020; and

WHEREAS, Congress only made provision in the Alaska Mental Health Trust Act of 2017 for the conveyances to be encumbered with valid existing rights at the time the law was passed. Mr. Romey's expired permit is not a valid existing right.

WHEREAS, the law only gives minor exceptions to deviate from the lands Congress identified to be exchanged. These minor exceptions do not apply in such a way that the land occupied by the Boatworks can be removed from the exchange; and

WHEREAS, following execution of the Agreement, the Forest Service determined that it did not

accurately take into consideration that CRG-00346 Wolf Creek Boatworks is owned by Mr. Romey and might be removed before the land was transferred. The signatories to the Agreement recognized that the removal of CRG-00346 Wolf Creek Boatworks was a potential direct adverse effect to a historic property that had not been accounted for in the original Agreement and an amendment would be needed; and

WHEREAS, the Forest Service invited seven additional interested parties [Haida Corporation, City of Hydaburg, Hydaburg Cooperative Association, City of Kasaan, Organized Village of Kasaan, Sealaska Corporation, and Alaska Association for Historic Preservation, Inc.] to consult on resolving the effects to CRG-00346 Wolf Creek Boatworks and Organized Village of Kasaan and Alaska Association for Historic Preservation, Inc. chose to participate; and

WHEREAS, due to public interest in the effects to CRG-00346 Wolf Creek Boatworks, the Forest Service has facilitated additional public involvement efforts, including posting information on a project website and accepting comments from interested parties and the public through May 22, 2020 and 28 comments were received from 19 commenters and taken into consideration by Signatory Parties in the development of this amendment; and

WHEREAS, AMHTA manages its resources to serve the mental health trust and its beneficiaries in Alaska and has a fiduciary responsibility to generate revenue; and

WHEREAS, if CRG-00346 Wolf Creek Boatworks were transferred intact, the Forest Service does not have the authority to direct AMHTA to pursue opportunities and management conditions that would result in the property's continued use and preservation; and

WHEREAS, due to the coronavirus (COVID-19) pandemic, the Forest Service has also determined that deadlines for several existing Stipulations, which require meetings and public gatherings, need to be extended; and

NOW, THEREFORE, in accordance with Stipulation VII of the Agreement, the USDA Forest Service, Tongass National Forest, the Alaska State Historic Preservation Officer, the Advisory Council on Historic Preservation, and the Alaska Mental Health Trust Land office agree to amend the Agreement as follows:

1. Amend Preamble to add the following:

WHEREAS, Appendix A, Maps 1-3 constitute the Area of Potential Effect for the Undertaking.

Amend Stipulation I.E.3 to change (2021) to:

(2022).

Amend Stipulation I.E.3.c to change 2021 to:

2022.

Amend Stipulation I.E.3.d to change 2020 to:

2021.

- 5. Amend Stipulation I.E. to add the following:
 - 5. The Forest Service will compile all existing historical information about CRG-00346 Wolf Creek Boatworks collected by the Forest Service and any other person or entity who may have historical information they are willing to share into one electronic file; histories, photographs, drawings, etc. This effort will not include additional documentation of CRG-00346 Wolf Creek Boatworks itself and will not require a visit to the structure. The Forest Service will prepare a publication that shares the historic context of the property and highlights its importance to the local communities of Hollis and Kasaan as a boatworks. A statement of work shall be prepared through a collaborative process by a committee that includes representatives from the SHPO and the Forest Service, for the purposes of detailing the steps involved in preparing the publication, to include review periods.

The Forest Service Tongass National Forest Heritage Program Manager shall coordinate the development of the statement of work. The statement of work shall be completed no later than one year prior to the expiration of the Agreement. The Forest Service will distribute the final publication to local community libraries. The Forest Service will submit a copy of all materials described above to the Office of History and Archaeology and append a copy to the Historic Property Management Plan (HPMP) so that AMHTA has good information on the resource they will have under their management. This stipulation is to be funded by the Forest Service and tasks identified in the statement of work will be completed by the expiration date of the Agreement whether or not CRG-00346 Wolf Creek Boatworks is transferred intact.

- 6. If CRG-00346 Wolf Creek Boatworks is transferred intact, due to abandonment by the former owner, AMHTA shall manage the property within the constraints of the Alaska Historic Preservation Act. The AMHTA shall communicate to the Forest Service for their awareness if the status of the Boatworks changes while this Agreement is in effect.
- 7. If CRG-00346 Wolf Creek Boatworks is transferred intact, due to abandonment by the former owner, the Forest Service shall ensure guidance developed for the HPMP, pursuant to Stipulation E.2, includes recommendations focused on the long-term preservation of CRG-00346 Wolf Creek Boatworks, including considering identifying potential reuse opportunities and guidance for mothballing. The Forest Service is responsible for funding the development of the HPMP as described in this stipulation. The HPMP will be completed by 90 days prior to the expiration date of the Agreement.

Warl Dowart	7 <i>/</i> 28 <i>/</i> 20
M. Earl Stewart	Date
Forest Supervisor, Tongass National Forest	
USDA Forest Service	
Alaska State Historic Preservation Officer Office of History and Archaeology	8 5 2020 Date
JOHN M. FOWLER	Date
Executive Director	
Advisory Council on Historic Preservation	ق
Wyn Menefee	7/22/2020 Pate

Executive Director

Alaska Mental Health Trust Land Office

M. Earl Stewart	Date
Forest Supervisor, Tongass National Forest	
USDA Forest Service	
JUDITH E. BITTNER	 Date
Alaska State Historic Preservation Officer	
Office of History and Archaeology	<u>8/10/20</u>
JOHN M. FOWLER	Date
Executive Director	
Advisory Council on Historic Preservation	
Wyn Menefee	Date
Executive Director	
Alaska Mental Health Trust Land Office	



AIRPORTS DIVISION

222 W. 7th Avenue, Box 14 Anchorage, Alaska 99513-7587

Federal Aviation Administration

In Reply Refer To:

Tom Madsden (Dutch Harbor) Airport Unalaska Taxiway and Apron Rehabilitation State/Federal Project Number(s): SFAPT00178 / AIP no. 3-02-082- -202

Consultation Initiation

June 7, 2024

William Homka, City Manager Unalaska Historic Preservation Commission 43 Raven Way Unalaska, AK 99685

Dear Mr. Homka,

The Federal Aviation Administration (FAA) Alaska Region Airports Division has received an application for federal assistance from the Alaska Department of Transportation and Public Facilities (DOF&PF). DOT&PF is proposing to rehabilitate the aprons and taxiways, update the taxiway geometry, and reduce ponding on the pavements at the Tom Madsen Airport (DUT) in Unalaska (Dutch Harbor), Alaska. Latitude 53.895718, Longitude -166.539544. The project area is found in Table 1 and Figure(s) 1 and 2.

Table 1. Project Location

Township	Range	Section(s)	USGS Quad Map1:63,360	Meridian
72 South	117 West	34	Unalaska, AK	Seward

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations in 36 CFR 800, we are initiating this consultation with you to assist us in determining the Area of Potential Effect (APE) and identifying historic properties that may be affected by the proposed project. The proposed action is an undertaking as defined in 36 CFR § 800.16(y) and has the potential to cause effects on historic properties.

Project Description

The Terminal Apron and Taxiway A on the Tom Madsen Airport were initially constructed in 1943 by the Naval Construction Battalions, Seabees. The primary components to these features is a subbase of adjoining "slabs" (i.e., a cubic square that is 20-feet by 20-feet and 8 inches deep comprised of Portland Cement Concrete (PCC)), and an overlay of hot mix asphalt (HMA). The original concrete surface was paved over in order to create a more uniform surface across the adjoining slab squares, and as a means to prevent erosional rutting of the runway. An HMA apron expansion was constructed in 2003. The overlain portion of the pavement now has significant raveling and areas of exposed PCC where the overlay has worn away. Turf growth at

the edge of the apron and loss of overlay pavement create pond areas for surface waters to accumulate that contribute to the surface distress. The exposed portions of slabs are severely weathered and rough, and the joints are spalled and missing sealant. Erosional wear of the surface can create Foreign Object Debris (FOD) which can be damaging to aircraft.

The proposed project construction consists of (Figure 2):

- Rehabilitating Terminal Apron and Taxiway A surfaces (as described below);
- Updating the taxiway geometry (Taxiway A will be diverged in order to create an additional Taxiway C);
- Installing aircraft tiedowns;
- Installing in-kind taxiway lighting;
- Drainage improvements in previously disturbed areas by removing vegetation and regrading adjacent turf areas to improve drainage paths;
- Rebuilding in-kind trench drain sections; and
- Installing a heat trace line in trench drain.

The following construction option is proposed only for Taxiways A and C because Taxiway B is to be preserved in place:

• Replace the existing HMA overlay, repair the existing PCC as needed, correct associated drainage issues, reconfigure the taxiways with markings and lighting as shown in the figures, install aircraft tiedowns, and delineate excess pavement areas with non-movement markings (see Attachment A for existing conditions of the airport layout).

Preliminary Area of Potential Effect (APE)

The preliminary APE (36 CFR 800.4(a)[1]) includes the DUT property boundary to encompass all areas of potential ground disturbance within the airport property, equipment staging areas, and proposed haul route access onto airport property (Figures 1 and 2). The APE may be refined should a material site be selected. The APE may also be refined following comments from your agency and consulting parties.

Identification Efforts

The identification efforts expand beyond the preliminary APE to obtain relevant information on the types of resources to anticipate within the preliminary APE, and to also capture the Dutch Harbor Naval Operating Base. Stantec archaeologist Daan Meens conducted a literature review and background research to identify cultural resources within a defined Study Area that included a quarter-mile boundary around the preliminary APE (conform 36 CFR 800.4(a)[2]). Mr. Meens meets and exceeds the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-44739) and the criteria of 43 Code of Federal Regulations 7.8.

Stantec reviewed the Alaska Heritage Resource Survey (AHRS) and relevant National Park Service (NPS) historic property nomination forms. The search of the Study Area, shown on Figures 3 and 4, revealed 28 previously recorded cultural resources within one quarter mile of the APE (see Table 2). These consist of 6 precontact sites and 22 historic sites. Eight of the

historic sites are homes in the Port of Dutch Harbor, the remainder are structures associated with the Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army, which is a National Historic Landmark (UNL-00120) listed in the National Register of Historic Places (NRHP).

Table 2. Previously recorded cultural resources within one quarter mile of the APE

AHRS	AHRS Side Name True			
Number	Site Name	Type	APE?	
UNL-00105	Airport Flake Site	Precontact	Yes	
UNL-00114	Powerhouse Flake Site	Precontact	No	
UNL-00119	Fort Schwatka	Historic	No	
UNL-00120	Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army National Historic Landmark	Historic	Yes	
UNL-00123	Airport Buried Site	Precontact	No	
UNL-00124	Airport Beach "Site"	Precontact	Yes	
UNL-00205	Delta Western Fuel Dock	Historic	No	
UNL-00293	Airport Not Buried Site	Precontact	No	
UNL-00294	Dutch Harbor Town Site	Historic	No	
UNL-00316	Ballyhoo Antenna Site	Precontact	No	
UNL-00426	Former Commanding Officer's House		No	
UNL-00432	House #5, Roraback House 2	Historic	No	
UNL-00433	House #4	Historic	No	
UNL-00434	House #3 Historic		No	
UNL-00435	IL-00435 House #2, FDOC House		No	
UNL-00436	House #1	Historic	No	
UNL-00437	House #9, Alyeska Seafoods House	Historic	No	
UNL-00438	House #10	Historic	No	
UNL-00457	House #16	Historic	No	
UNL-00466	Torpedo Bombsight and Utility Shop, Building 423	Historic	Yes	
UNL-00471	Aerology operations, Building 417	Historic	Yes	
UNL-00473	Eliza Anderson Shipwreck	Historic	No	
UNL-00474	Naval Laundry Facility, Building 400	Historic	No	
UNL-00564	Booster Heating Station, Building 503	Historic	No	
UNL-00600	Torpedo Assembly-Annex, Building 447	Historic	No	
UNL-00601	Torpedo Assembly, Building 403	Historic	No	
UNL-00602	Powerhouse, Building 409	Historic	No	
UNL-00646	Naval Operating Transport Warehouse	Historic	No	

Five AHRS resources currently overlap with the preliminary APE: two precontact sites, two historic sites and one historic district (Table 3). None of these resources have a Determination of Eligibility (DOE) mentioned in the AHRS form even though two are currently listed in the NRHP.

Table 3. Previously recorded cultural resources in the preliminary APE (based on AHRS)

AHRS Number	Site Name	Type	DOE Status	NRHP Eligibility
UNL-00105	Airport Flake Site	Precontact	N/A	Partially Destroyed
UNL-00120	Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army National Historic Landmark	Historic	N/A	NRHP Listed, Historic District
UNL-00124	Airport Beach "Site"	Precontact	N/A	Not Eligible (Destroyed)
UNL-00466	Torpedo Bombsight and Utility Shop, Building 423	Historic	N/A	Eligible (Demolished)
UNL-00471	Aerology operations, Building 417	Historic	N/A	Eligible

Precontact site UNL-00105, the "Airport Flake Site", consists of 694 stone artifacts, most on the surface, over an unvegetated 74 meter x 33 meter area. The site was first recorded in 1974. The site's south end is partially destroyed by the construction of a WWII hangar and revetment. An estimated 15% of the site remains intact with stratified cultural deposits. The location is listed in the site form as "exact and verified."

Historic district UNL-00120, the "Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army National Landmark" is listed in the NRHP under Criteria A and D. The base served as the main base for the American presence in the Aleutian Islands during World War II and received the most serious air attack on North America during the war. Dutch Harbor was an important north Pacific stopover in the lend-lease program with the Soviet Union. The Landmark was listed in 1984 and encompasses all of Amaknak Island, from Mount Ballohoo and Ulakta Head on the north, to Bunker Hill and the original site of Fort Mears to the south. The site contains World War II coastal defenses (on Mount Ballyhoo), structures associated with the Naval Base, barracks and structures associated with Fort Mears, and foxholes and other military training related features (on Haystack Hill).

Precontact site UNL-00124, the "Airport Beach Site", was first recorded in 1984 and consists of redeposited cultural materials from UNL-00123 and UNL-00054; the latter is a prehistoric midden site titled Amaknax that is located over 3,000 feet southwest of the airport, and has been heavily disturbed by construction activities over time. The location of UNL-00124 is listed in the site form as "exact and verified." However, description of the location is "beach south of 1984"

airport terminal, west shore of middle neck of Amaknak Island." AHRS has the site mapped on the northeast corner of the terminal building, in a paved section of the apron. The mapped location is likely incorrect based on the description of the site. The site is most likely outside and south of the APE based on the description, and completely destroyed as it is in secondary context.

Historic site UNL-00466, the "Torpedo Bombsight and Utility Shop, Building 423" is eligible for the NRHP as a contributing element of district UNL-00120. The building was constructed in 1942 by the Navy during the Aleutian Campaign and used by the Navy until 1959. The structure is significant for its association with the use of Unalaska by the U.S. military during World War II. The structure is mapped in the middle of the paved taxiway, which is incorrect. Based on the location info it is located as depicted in Figure 5 on the next page. Approximately 10 years ago the building was under private ownership but DOT&PF requested it be demolished due to it becoming a safety hazard; a Memorandum of Agreement was signed in 2014 which has been met and is considered complete.

Historic site UNL-00471, the "Aerology Operations, Building 417" is eligible for the NRHP as a contributing element of district UNL-00120. The building was constructed in 1942 and was used as the Aerology Operations building during WWII (Figure 5). It was an important part of the Dutch Harbor Naval Operating Base and functioned as the meteorological station for the Naval Air Facility and as the Naval Air Transport Terminal. The unpredictable weather conditions in the Aleutian Islands made aerology operations essential for safe aviation during the Aleutian campaign. The building was used as the airport terminal for many years and is now operating as a World War II museum.

Previous cultural resource surveys that have been conducted in the area are listed in Table 4 on page 7. Two projects are archaeological inventories, and five are historic inventories related to the Naval Operating Base, and one is a literature review.

Additional Identification Efforts

Based on the available information about previously recorded cultural resources in the APE (Table 4), FAA believes that no further field studies are required for the Project. FAA believes that the current level of identification is sufficient for this project.

Consulting Parties

Consulting parties for this project include:

- Alaska State Historic Preservation Officer
- Native Village of Akutan
- Native Village of False Pass
- Native Village of Nikolski
- Qawalangin Tribe of Unalaska
- Ounalaska Corporation
- Aleut Corporation

- City of Unalaska Historic Preservation Commission
- National Park Service
- Museum of the Aleutians
- Alaska Association for Historic Preservation

Figure 5. Naval Air Station Plan depicting Buildings 417 and 423. Naval Operating Base Dutch Harbor and Fort Mears, Unalaska, Aleutian Islands, AK HABS AK,1-UNAK,2- (Sheet 6 of 7)

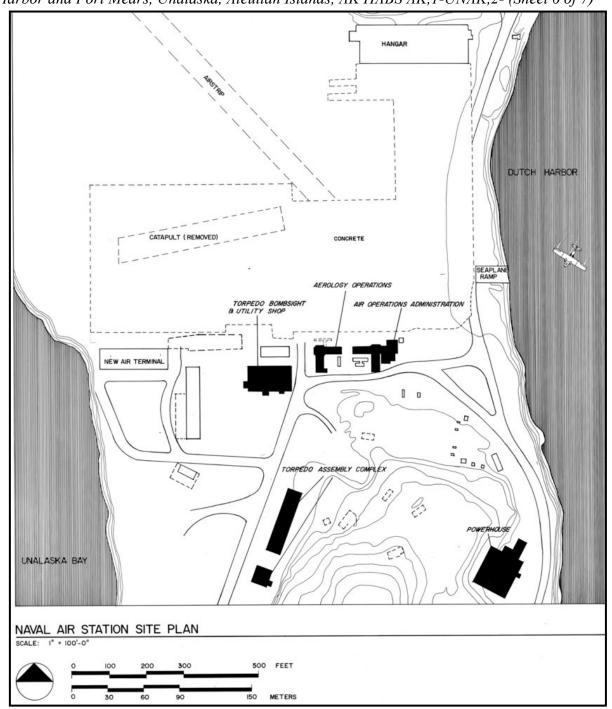


Table 4. Previous Cultural Resource Investigations within the Study Area

Year	Title	Author
1984	An Archaeological Site Survey of Amaknak and Unalaska Islands, Alaska	Veltre, D.W. et al.
1984	National Register of Historic Places Nomination Form, Dutch Harbor Naval Operating Base and Fort Mears, U.S. Army	Thompson, E.N.
1999	Archaeological and Historical Literature Review, Amaknak and Unalaska Islands, Alaska	Jacobs Engineering Group Inc.
2001	Archaeological and Historical Report on the Environmental Restoration of Fort Learnard and Dutch Harbor/Unalaska under the Formerly Used Defense Sites (FUDS) Program	Yarborough, M.R.
2003	Unalaska: East Point/Ballyhoo Roads, Additional utility locates, Project No. 53430	Ruehle, J.O.
2003	Letter report re: the Unalaska Airport Torpedo Bombsight and Utility Shop Building Assessment Project No. 55829	Lincoln, G.
2003	Final Building Condition Assessment / Materials Investigation for the Torpedo Bombsight and Utility Shop, Unalaska Airport, Dutch Harbor, Alaska	Hyer, T., K. Philips, F. Park
2015	Archaeological Site Investigation Fort Schwatka, Amaknak Island, Alaska	USACE

If you have questions or comments related to this proposed project, please contact Kendall Campbell, Alaska Region Airports Division, at the address above, at 907-271-5030, or by e-mail at <u>Kendall.D.Campbell@faa.gov</u>. Your timely response will greatly assist us in incorporating your concerns into project development. For that purpose, we respectfully request that you respond within thirty days of your receipt of this correspondence.

Sincerely,

Kendall D. Campbell Alaska Native/Tribal Liaison Alaska Region Airports Division Federal Aviation Administration 222 West 7th Avenue, MS #14 Anchorage, Alaska 99513

Phone: 907-271-5030 Fax: 907-271-2851

Email: kendall.d.campbell@faa.gov

Enclosures:

Figure 1: Location and Vicinity Map Figure 2: Proposed Action Areas Figure 3: AHRS Search Area

Figure 5. ATTRS Search Area

Figure 4: AHRS Results Overview and Map Index

Figures 4a-4b: AHRS Results Insets

Attachment A: Airport Layout Plan – Existing Conditions (Sheet 3)

Electronic cc w/ Enclosures:

Bran Pollard, DOT&PF, Southcoast Region, Design Project Manager Tyler Riberio, DOT&PF, Southcoast Region, Environmental Impact Analyst Amy J. K. Russell, DOT&PF, Southcoast Region, Cultural Resources Specialist Benjamin Storey, DOT&PF, Southcoast Region, Regional Environmental Manager Holly McKinney, DOT&PF, Statewide, Acting Cultural Resources Manager Jack Gilbertsen, FAA, Environmental Protection Specialist

