

STATE OF ALASKA

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

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Dept. of the Army
Directorate of Public Works
Attn: IMPC-FWA-PWE (Malen)
1060 Gaffney Rd, #4500
Fort Wainwright, Alaska 99703-4500

Re: Fort Wainwright, Vapor Intrusion Pathway at OU6 and Administrative Issues

Dear Mr. Malen:

The Alaska Department of Environmental Conservation (DEC) and the U.S. Environmental Protection Agency (EPA) are concerned that proper sampling and analysis to characterize the vapor intrusion exposure pathway at OU6 is not being conducted, which will hinder successful completion of the Remedial Investigation.

DEC and EPA Project Managers participated in the Federal Facilities Agreement (FFA) meeting on December 7 & 8, 2009. The meeting included discussion on the response to agency comments on the draft OU6 Remedial Investigation. The Army and its contractor had previously prepared a response to the comments provided by DEC and DEC had supplied a rebuttal to the response to several comments pertaining to the vapor intrusion pathway (comments 114, 155, 173, 218, 244, 267, 274, and 340). The conclusion of the discussion on the vapor intrusion pathway, as DEC and EPA understood it, was that the Army, to support the development of attenuation factors and evaluate risk at each building, would evaluate a worst case risk scenario using data from the buildings that had the highest sub-slab trichloroethylene (TCE) results from both sampling events and the corresponding indoor air values. If there were no indoor air results from the units that had the highest sub-slab results, the Army agreed to resample the indoor air and sub-slab soil gas at these locations so that the paired data could be evaluated to demonstrate whether or not there is a potential unacceptable risk at these sites.

On December 16th, a week after the FFA meeting, DEC sent an email message to the Taku project team summarizing our understanding of the discussion results, requesting verification of that understanding, and requesting to review the work plan and, if possible, the scope of work for the additional sampling. When no response was received from the Army, another email message was sent on January 5, 2010 requesting a response; but none has been received. I spoke with you during another FFA meeting on January 14, 2010 and asked about the status of the vapor intrusion sampling, to which you replied the Army was going to beef up the radon

study at Taku Gardens. Again I explained that DEC had requested additional sampling and analysis for TCE and I provided you with a copy of the e-mail message that had been sent on December 16, 2009.

On January 20th, during the DEC sponsored Vapor Intrusion training, it was mentioned that the Army contractor was currently on-site doing radon sampling, which you verified. This is the second time that the Army has performed sampling to assess the vapor intrusion pathway without providing EPA and DEC with a work plan prior to beginning the work. The previous event occurred in September 2009. This is also the second time that the results of the work will not provide data that has been requested to properly evaluate the risk from the vapor intrusion pathway.

The FFA in Paragraph 11.2 states "The Army's Project Manager shall notify the U.S. EPA and ADEC Project Managers not less than fourteen business days in advance of any scheduled well drilling, sample collection, or other monitoring activity, conducted pursuant to this Agreement. The Project Managers will be notified prior to any unscheduled sampling event." The current sampling effort is being conducted in violation of this provision.

Without adequate coordination, input and approvals, successful completion of the Remedial Investigation is unlikely.

To better understand the Army's anticipated schedule and to improve coordination on the project, DEC requests that the Army:

1. Provide minutes of each FFA meeting, including all action items, within two weeks after each meeting and request comments on or approval of the minutes.
2. Submit a draft timetable for activities required by the OU-6 amendment to the FFA by February 12 for review and comment; after agreement of the Project Managers incorporate the timetable into Table 3 of the FFA.
3. Cease the current vapor sampling and submit a work plan to DEC and EPA for review.

DEC and EPA are committed to working with the Army to ensure OU6 is adequately characterized and any necessary remedial actions are taken so the site can be returned to beneficial use. If you have any questions regarding this letter, please contact either of us.

Sincerely,



Deb Caillouet
Environmental Program Specialist



Jacques Gusmano
Remedial Project Manager