

STATE OF ALASKA

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

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File: 108.38.085

June 17, 2010

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

Re: Technical Memorandum, June 2010 Soil Gas Sampling Work Plan Addendum, Former Communications Site (Taku Gardens) May 2010

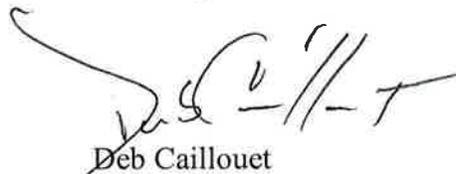
Dear Mr. Malen:

On behalf of the Alaska Department of Environmental Conservation (DEC) I have reviewed the referenced plan. Comments are listed below.

1. Please add sampling the sub-slab and indoor air for VOC's at Building 13 as this location is noted in the draft RI as having been built over soil with high PID readings.
2. In Section 2 the sampling procedures should be more clearly defined as we discussed in our teleconference today and a procedure for the indoor air sampling provided.

If you have any questions, please contact me at 269-0298.

Sincerely,



Deb Caillouet
Environmental Program Specialist

cc: Jacques Gusmano-EPA

25 February 2010

Memorandum for Record:

SUBJECT: Telecom between Ms Deb Caillouet ADEC and Mr. Joe Malen (US Army Garrison FWA)

On 24 Feb 10, I received a voice message from Ms. Caillouet requesting a phone call to discuss the Vapor Intrusion issues [at Taku Gardens]. At approx 0850 hrs I replied in an email that I was scheduled for meetings all morning and asked her if 1:00 PM would be okay. She left a voice mail later that morning to confirm our call at 1:00 PM and stated that her attempts to reply to my email were met with a computer generated notification that delivery was delayed.

I spoke with Ms Caillouet at approx 1300 hrs on 24 Feb 10 and we discussed vapor intrusion issues at Operable Unit 6, Taku Gardens and other topics. The following is intended to document what was discussed and I invite Ms Caillouet to provide input/corrections if needed. The document will be forwarded to the team for information purposes.

Ms Caillouet asked who is actually in charge of making the decision to conduct the indoor air/sub-slab VOC sampling [that the State of AK has requested]. I told her Mr. King [i.e. Army Environmental Command] is the final authority for deciding if and when the Army funds/ conducts the sampling requested. She mentioned her wondering who was calling the shots. "I noticed Joe [King] was doing the talking and you were very quiet during the conversation last week [discussion on 18 Feb 10 during the Installation Action Plan (IAP) meeting]."

Ms. Caillouet reiterated the State's position that failure of the Army to conduct the requested indoor air/sub-slab VOC sampling would result in a Dispute Resolution request by the ADEC and non-concurrence with the Remedial Investigation/Human Health Risk Assessment. The State will not back-off on any part of this request. I replied saying the Army's reluctance to conduct the [indoor air/sub-slab VOC] sampling event now was based on the concerns expressed in my response to her letter. The Army is concerned that the source levels will be so low that they will not present an accurate picture of what is going on in the units. I told her the Army was in the process of directing the contractors [consultants] to prepare the tech memo that Mr. King offered to generate [during the IAP meeting] that presents and summarizes past VOC and radon sampling data that we believe supports our position, and which Ms Caillouet said she [and the ADEC] have not seen formally. [Ms Caillouet accepted the offer during the meeting 18 Feb 10]. I told her I would provide progress updates after the tasking was complete and funds made available. I assured her that we would all sit down together and discuss the need for additional sampling after everyone had had a chance to review all of the data.

Ms. Caillouet asked if Jack [Mr. Gusmano, EPA Region 10] called me before his house fire. I said no. She proceeded to tell me that Mr. Gusmano had told her that in the submission of his Quarterly Status Report to Region 10 he stated that Taku Gardens was in non-compliance due to sampling without a work plan and input from the State and EPA. I told her that was the first time I had heard this [information].

I reiterated that the sampling was conducted in response to the Army's perception that the ADEC challenged the statistical validity of our previous work [Indoor Air/Sub-Slab Radon Gas Sampling to determine Attenuation Factors] and was concerned that the number of buildings used to determine the effectiveness of using radon gas to determine attenuation factors was statistically indefensible. I also stated that they [the consultant] were using the sample techniques and equipment as in previous work plans and did not think we required another review of the work plan. She replied words to the effect that "it was water under the bridge and done with".

Ms Caillouet closed the discussion by mentioning that she informed Guy [Warren] of our review of the MMRP [Military Munitions Response Program] during the IAP meeting and that he was satisfied for now. I asked if she mentioned the addition of the AAA [anti-aircraft artillery] sites. She said "yes, he was okay with them too".

We ended the conversation with an exchange of personal pleasantries. She mentioned that she would send a confirmation email as to the details of our conversation as well.



JOSEPH S. MALEN
RPM, Operable Unit 6
Directorate of Public Works
Environmental Division
Fort Wainwright, Alaska

CC

Jacques Gusmano, EPA Region 10
Joe King, Army Environmental Command
Bob Brock, US Army Corps of Engineers