

January 19, 2022 FINAL Minutes. Amaknak Formerly Used Defense Site Restoration Advisory Board

1. Opening Remarks
  - a. Rena welcomed attendees and wished everyone continued safety during the pandemic.
  - b. Roll Call/Quorum
    - i. Present: Jay King, Denise Rankin, Jim Paulin, Alyssa McDonald, Patty Gregory, Rena Flint
    - ii. Absent: Elise Contreras, Virginia Hatfield, Kale Bruner, Dave Gregory
  - c. Possible RAB Resignation
    - i. Virginia corresponded with Rena and RAB co-chairs to indicate her intent to resign from the board.
    - ii. Rena said Virginia would be welcome to return to the board in the future, but the RAB will remove her from the Roll Call for the next meeting.
2. Revise/Adopt Minutes
  - a. Alyssa moved to adopt minutes from November 10, 2021, and Jay seconded.
3. Local Updates/Community Introductions/Public Comment
  - a. Additional Attendees (non-RAB members): Thomas Roufos, Craig Scola, Theo Greenly, Andy Sorum, Chandra Poe, Cas Galasso-Irish, Rachel Lekanoff, Chris Price, Ben Leon-Guerrero, Natalie Cale, Mike MacMillan, Kendall Campbell, Laresa Syverson, Forrest Kranda, Pete Jeppesen, and Commissioner Jason Brune of the Alaska Department of Environmental Conservation (ADEC)
  - b. Consultant Attendees (provided meeting facilitation and support): Josie Wilson, Tyler Remkus
  - c. Public Comment:
    - i. Pete explained that he came to the meeting to highlight the Unalaska Airport Torpedo Building Site. He is interested in getting help for the costs that have been incurred to clean up the site.
4. Native American Lands Environmental Mitigation Program (NALEMP) Update
  - a. Mike MacMillan from the U.S. Army Corps of Engineers provided an update on NALEMP.
  - b. Mike has been with the NALEMP program for about three years, and he has worked directly with Elise at the Qawalangin Tribe for about a year.
  - c. Mike explained that the Department of Defense (DoD) created NALEMP in 1993 to address environmental impacts. For the past ten years, Congress has funded NALEMP with around \$12M annually for work nationwide. Alaska has largest share of NALEMP funding.
  - d. The eligibility criteria for contamination to be eligible for NALEMP projects is as follows:
    - i. must be a result of DoD activities,
    - ii. must impact a federally recognized Tribe,
    - iii. must be on eligible land (trust lands, subsistence use lands, tribal member property, or Alaska Native Claims Settlement Act [ANCSA] lands), and
    - iv. not eligible to be addressed by any other government program within the next three years.
  - e. Projects include removal of buildings and debris, remediation of contaminated soil and groundwater, and investigation and removal of military munitions. Steps in the NALEMP

process include site discovery, assessment, project selection. USACE helps Tribes write 2-year cooperative agreements (CAs), and then a Strategic Program Implementation Plan (SPIP) is developed. The Tribe is empowered to take the lead in any project decision making. USACE's role is to assist with eligibility determinations and to assist Tribes with required processes and documents.

- f. The first CA between the DoD and Qawalangin Tribe was signed in 2001. The current one expires 2022. The next CA should be completed by September. The Tribe was able to clean up debris in the Unalaska Valley Broadway North and South areas. The Tribe was also able to conduct a screw picket survey on Unalaska and Amaknak Islands. For 2022, planned work includes cleanup of screw pickets and barbed wire from the Beaver Inlet area; removal of equipment from transformer vaults at Mt. Ballyhoo along with characterization of possible PCB contamination; removal of debris from the Unalaska Valley area; and removal of debris and asbestos from the Pyramid Valley area.
  - g. Questions for Mike:
    - i. Jim asked whether screw pickets could be made available to the public? Mike said it's possible that the Tribe could further that discussion. Rena mentioned that it would be important that the screw pickets not become a safety hazard after they are removed. Jim said he thinks they have historical value to the public and that the sharp points could possibly be removed for safety.
    - ii. Rena asked Mike about underground storage tank (UST) 3065 in Broadway and wondered whether the concrete would be removed under NALEMP. She asked because the Formerly Used Defense Sites (FUDS) program is planning to remove contaminated soil from the site. Mike said he would have to check with Elise about whether the concrete would be removed.
  - h. Mike can be reached at [michael.macmillan@usace.army.mil](mailto:michael.macmillan@usace.army.mil) or (907) 227-9348 (cell) for any questions.
5. Chernofski FUDS Update
- a. Andy Sorum from USACE provided an update on the Chernofski Harbor Supply and Storage FUDS property. USACE is continuing hazard mitigation with their third major mobilization to the site in the last ten years.
  - b. This year's work will focus on source removal actions and preparation for a future remedial investigation. Specific work will include continuing to remove petroleum, contaminated soil, and a pipeline.
  - c. Andy noted that this work will occur in a historically and culturally sensitive area. An archaeologist will be monitoring the work. The contractor will also assess whether batteries ran on site and will remove any batteries discovered.
  - d. The contractor will be on site from approximately late May through July. The contractor team will include about 10 people and minimal heavy equipment.
  - e. Questions for Andy:
    - i. Natalie asked for the name of the contractor performing the work. Andy answered that Brice Environmental will conduct the work.
    - ii. Ben asked whether USACE has contacted St. Paul regarding surface estate. Andy described extensive coordination and a Memorandum of Agreement (MOA) with Tribes and other stakeholders due to the significance of the site.

- iii. Chris asked whether archeological work is complete at Chernofski. Andy answered that it is not complete. USACE will have an archaeologist on site while working. Andy said Chris and anyone in the meeting is welcome to contact him for further questions.
  - iv. Jim asked whether the work will affect sheep. Andy said that USACE will continue to coordinate with local sheep ranchers, but he doesn't expect these cleanup activities to have an impact on ranching.
  - v. Rena asked whether is possible to share the MOA with the RAB. Andy said the MOA is available to all stakeholders.
- f. Andy can be reached at [andrew.c.sorum@usace.army.mil](mailto:andrew.c.sorum@usace.army.mil) or 907-753-2575.
- 6. Cleanup of ANCSA Lands and Alaska Department of Environmental Conservation (ADEC) Notices of Intent to Sue U.S. Department of Interior (DOI) Update
  - a. Cas Galasso-Irish from ADEC addressed cleanup of ANCSA Lands and ADEC's Intent to Sue the U.S. Department of the Interior (DOI). She noted 2021 was the 50<sup>th</sup> anniversary of ANCSA. ADEC is frustrated that the contamination on many of these lands in the State of Alaska has not been addressed.
  - b. ADEC provided Notices of Intent to sue regarding 548 contaminated sites. 69 of these sites are located in the Unalaska vicinity.
  - c. Cas says that ADEC hopes DOI puts forward a plan to address these contaminated lands. DOI must respond to the Notices of Intent by February 17, 2022. Cas shared the DEC website link, including the press release and other documents relevant to the intent to sue: <https://dec.alaska.gov/spar/csp/federal/formal-correspondence/>
  - d. Questions related to the NOI can be directed to Laura Achee, ADEC Public Information Officer, at (907) 465-5009 or [Laura.achee@alaska.gov](mailto:Laura.achee@alaska.gov).
  - e. Commissioner Jason Brune also provided updates on this issue. He said contamination on ANCSA lands has been a long-time priority for him, and he explained that Governor Dunleavy sent a letter to the President in May asking him to engage on this issue. Commissioner Brune and the State Attorney General sent letters to the U.S. Secretaries of the Interior, Agriculture, and Defense, letting them know that as responsible parties they are ultimately responsible for cleaning up the lands. After not hearing back from the federal government, the Commissioner says the state was left with no option but to file the Notices of Intent. DOI has 60 days to respond, and the Commissioner hopes the they will respond favorably. He reiterated that ADEC's goal is for the lands to be cleaned up. The Commissioner says this is important because these are lands that people use for living, hunting, fishing, subsisting, and enjoying recreation activities. The Commissioner expressed appreciation for the RAB and for their engagement with the federal government.
  - f. Questions for ADEC presenters:
    - i. Jim asked whether the lawsuit applied to lands other than ANCSA lands and mentioned the Torpedo Building as an example. Commissioner Brune answered that all the sites addressed by the NOI are on ANCSA lands, but the names of the sites may indicate other ownership. Cas confirmed this is correct. Denise commented that she believes the Torpedo Building is on state-owned land, clarifying that it was on former ANCSA lands that were conveyed to the state.
      - 1. Clarified 548 sites include some originally conveyed to Alaska Native Corporations (ANCs), then transferred to State (i.e. Dutch Harbor

Torpedo Building site owned by Alaska Department of Transportation [ADOT]).

- ii. Alyssa asked whether there has been any federal money invested into cleaning up these sites. Commissioner Brune answered that there has been federal funding for some of these sites, but the speed at which the sites are being cleaned up is not acceptable to the State. At current rates of funding, some sites could take between 150 and 300 years to be cleaned up. Alyssa said that she's not going to be here in 100 years, and she wants to know how this is going to be remedied. Commissioner Brune said that he and the Governor agree with that sentiment, and there needs to be expeditious effort by the federal government to address this problem.
  - iii. Denise thanked the Commissioner for his efforts to clean up ANCSA land. She says that it is not an easy process for ANCs when they have to resort to cleaning up the lands themselves and pursuing reimbursement. Commissioner Brune added that the DOI responded to the May letter saying they are not responsible for cleanup without documentation that the contamination occurred while the U.S. Bureau of Land Management (BLM) controlled the land. He said the state disagrees with that position. He also thanked Denise for her kind words and encouraged engagement with the federal government.
  - iv. Chris Price and Thomas Roufos commented to thank the Commissioner for speaking to the RAB.
  - g. Cas can be reached at [cascade.galasso-irish@alaska.gov](mailto:cascade.galasso-irish@alaska.gov) or 907.451.2181 for questions. Commissioner Brune can be reached at [DEC.Commissioner@alaska.gov](mailto:DEC.Commissioner@alaska.gov) or 907-465-5066.
7. Amaknak FUDS Pre-WWII Tank Farm Draft 2nd Periodic Review Update
- a. Rena provided an update on the Pre-WWII Tank Farm Draft 2<sup>nd</sup> Periodic Review. She requested comments from the RAB by February 7, 2022. **(At Cas's 2/1/22 request, this comment period has been extended to March 7).**
  - b. The document addresses the protectiveness of the remedy in place for this project. This is the first document that Rena has submitted to the RAB for comment.
  - c. Rena's goal is to wrap up the Remedial Action Objectives phase of this project and to move into the Long-Term Management (LTM) phase. She is recommending a third protectiveness inspection in fall 2022 and a site inspection including gauging wells in lieu of 30<sup>th</sup> groundwater sampling event. The 29<sup>th</sup> Groundwater Sampling Report (December 2020) indicates that this is a very stable plume that is not migrating. Decision Document cleanup levels have not been exceeded since 2004. Rena would also like to propose environmental covenants on 8 lots under the Uniform Environmental Covenants Act (UECA) and move into LTM.
  - d. Questions for Rena:
    - i. Denise asked how the RAB's comments would factor into the environmental covenants and whether the landowners would be consulted. Rena explained that the landowner and ADEC are the parties that enter into the environmental covenant. USACE is a responsible party that would conduct additional cleanup activities if needed.
    - ii. Alyssa asked how likely Delta Western is to sign off on the covenants given that there is still free product on site. Rena explained that Delta Western is a leaseholder and would be consulted as a part of the subordination agreements part of the covenants.

- iii. Piama asked about the property boundary on the map Rena presented during the meeting and why it seems to exclude the areas on the beach to the Northwest where the highest Polychlorinated Biphenyl (PCB) concentrations were highest. Rena explained that the red outline marks the boundaries of the 8 properties affected by the extent of the fuel contamination in the groundwater; it does not relate to any PCB contamination. Piama also asked if there are lots other than those 8 shown on the map affected by contaminated groundwater? Rena explained that the boundaries of contamination shown pertain only to this specific project (Amaknak Pre-WWII Tank Farm). **Action Item:** Rena to follow up with Piama and provide the Pre-WWII Tank Farm Draft 2<sup>nd</sup> Periodic Review in response to her question.
- iv. Chris asked how recent the monitoring well data is for this location. Rena responded that the last monitoring was in October 2019, and the Monitoring Report was produced in 2020. USACE sampled 10 wells and replaced a few broken wells. Free product was observed in 3 wells. No wells exceeded cleanup levels since 2004. USACE used an advance technique to sample groundwater beneath product to evaluate what was in the dissolved state. Chris also asked if Rena could identify the free product observed in the wells. Rena answered that the product is Bunker C.
- v. Ben asked if the environmental covenants are a form of Institutional Controls. Yes, since the passage of UECA in 2018, Environmental Covenants are the ADEC preferred institutional controls. Cas confirmed this is one of the only forms of institutional controls ADEC is accepting, it is just a better way to track things, they are recorded with Alaska Department of Natural Resources (ADNR).
- vi. Thomas asked if it's possible to remove the free product. Rena said they've attempted free product removal before, but she believes it was not very successful. It is something she's thought about and considered for this site. **Action Item:** Rena to follow up on this topic with Thomas.
- vii. Jim asked about the advanced technique for sampling contamination below free product. Rena explained that they froze a core around the tubing and then they collected the sample once it was thawed below the product.

#### 8. Unalaska Valley Contracting and Landowner Coordination Update

- a. Rena explained that USACE has identified seven sites where they want to do additional coordination to achieve cleanup completion. USACE is recommending additional removal action at three of these sites. USACE is proposing environmental covenants on one site and additional groundwater sampling on two sites. One site will be evaluated for the presence of groundwater and bedrock.
- b. A draft scope of work is being reviewed internally within USACE, but they are currently awaiting plus-up National Defense Authorization Act (NDAA) funds and are still unsure if this work will be eligible. Rena hopes to conduct this field work during Summer or Fall 2022, but if USACE is unable to secure funding, right-of-entry, and State Historical Preservation Office coordination, then the work will be completed in 2023 using regular baseline funding.
- c. Questions:
  - i. Cas asked whether UST 3065 is the only FUDS/NALEMP overlap site among these sites. Rena confirmed that is correct. Rena added that FUDS/NALEMP overlap is not uncommon, but there have to be different missions. In this case

the different missions are removing debris (NALEMP) and removing contamination (FUDS).

- ii. Chris asked for which site there is an environmental covenant in Unalaska Valley. He also asked the reason for the covenant. Rena pointed to the map in the meeting packet and answered that the site is UST 2667. There is a Department of Public Works (DPW) building built on top of a WWII foundation. There is fuel-contaminated soil beneath the DPW building. Coordination for digging or well installation would need to be coordinated with ADEC. Rena did provide documents to the City on her current trip to Unalaska. The City is the landowner.

9. Updates on RAB member initiatives

- a. Rena explained that she is proposing 4 committees based upon the interests discussed during the November meeting.
  - i. Meeting Promotion (Alyssa McDonald, Jay King)
  - ii. Sustaining RAB Membership (Patty Gregory)
  - iii. Outreach, History, Safety, and Fun (Elise Contreras, Jim Paulin, Kale Bruner, Denise Rankin, Patty Gregory)
  - iv. Records Management (Denise Rankin, Kale Bruner, David Gregory)
- b. RAB member comments and updates on actions completed since last meeting:
  - i. Alyssa mentioned that she coordinated with the radio station prior to this meeting. She would like to provide more updates on RAB events via the radio, i.e. report on Minutes.
  - ii. Jim mentioned the safety film festival idea, which he brought up in the last meeting. He mentioned having found some old military animated safety videos starring "Private Snafu." Jim proposes calling his committee "Morale, Welfare, and Fun." Proposes a movie event at the WWII Visitors Center.
  - iii. Jay posted flyers in key locations (Post Office, Alaska Ship Supply, Safeway, Library) prior to this meeting, and he also reached out to the city clerk who ensured the meeting info was distributed via multiple means, i.e. Nixle and DPS Facebook page.
  - iv. Jim mentioned there would be a lot of community interest in the screw pickets. Mike noted the Tribe is going to try to remove around 5,000 pounds of screw pickets under the next cooperative agreement.
  - v. Denise will research what other RABs around the country are doing as far as hosting websites. Jim asked about possibility of web development training. Rena noted there is technical support funding available for RAB: Technical Assistance Grant (TAG) or Technical Assistance for Public Participation (TAPP). Chris mentioned that the Tribe may have resources for web site development under the Environmental Protection Agency (EPA) Tribal Response Program (TRP).  
**Action Item:** Rena to research options for web development training for RAB members and provide information on what other RABs are doing.
  - vi. Patty said that she is ok with being on both committees Rena proposed.

10. Next Meeting: May 4<sup>th</sup> at 6pm. Alyssa motioned; Rena seconded.

11. Additional public comment and discussion:

- a. Craig shared a figure with the RAB: "Qawalangin Tribe of Unalaska NALEMP FY 2018 Strategic Project Implementation Plan (SPIP)." He was wondering why the boundary depicted on the map does not include sites to the Southwest, particularly the south

facing slope of Mt. Ballyhoo where there are several structures including one that contains asbestos. Denise noted the buildings are above the airport and revetments, on Tundra Drive. Rena mentioned that the Qawalangin Tribe drew the boundary depicted on the map, and that is their way of classifying the site and prioritizing the areas where they want to do work. Mike asked if the buildings Craig mentioned have been entered into Native American Management System for Environmental Impacts (NAMSEI) database or the previous SPIP. **Action Item:** Craig said he will forward figures and verbiage to Mike to examine. Rena suggested including Elise on that correspondence as well.

- b. Craig asked if USACE has undertaken any efforts to survey the Mount Ballyhoo area above the airport for explosive ordnance. Craig and Laresa are working with the State Troopers to put together a report. Jay said the Department of Public Safety makes a report to the Explosive Ordnance Disposal team anytime there is unexploded ordnance reported. **Action Item:** Rena suggested a standing update on the Range Complex No. 1 project which includes this area of Mt Ballyhoo. The RAB could help compile information to make the case for why this project could be a funding priority. Piama strongly recommends this database. Jay and Alyssa to make a PSA to make gathering information more user friendly. Rena recommended DoD Environmental Safety and Occupational Health Network and Information Exchange (DENIX) Recognize, Retreat, Report (3Rs) resources, i.e. coloring books and more.
- c. Pete said that he wanted to meet the Board and see if there is money available for leaseholders for Torpedo Building cleanup activities. Rena responded that she needed more information for her to be able to help. She could provide more information to Pete if he contacts her and provides more information on the history of the project he is referencing. **Action Items:** Rena to follow up with Pete for more information. Jay and Alyssa to build a list of potential resources.
- d. Cas asked whether there was an update from the Planning Commission meeting in November (see November 10, 2021 RAB Meeting Minutes for more details). Denise said the RAB submitted a comment regarding the Aerology Building UST contamination at the Unalaska Airport.

#### 12. Action Items/Next Steps:

- a. Rena to follow up with Piama and provide the Pre-WWII Tank Farm Draft 2<sup>nd</sup> Periodic Review in response to discussion on the map shown during the meeting. Rena provided to Piama.
- b. Rena to follow up with Thomas regarding the history and possibility of free product recovery at the Pre-WWII Tank Farm.
- c. Denise/ Rena to research options for web development training for RAB members and provide information on what other RABs are doing.
- d. Once Craig sends figures and information to Mike and Elise regarding Mt. Ballyhoo cleanup and NALEMP SPIP, Mike to respond. Craig, Mike provided to Elise.
- e. Rena to provide standing update on Range Complex No. 1 project so that the RAB can help compile information.
- f. Rena to follow up with Pete for more information regarding funding of Torpedo Building. Jay and Alyssa to build a list of potential resources.

13. 8:19PM Adjournment: Alyssa made a motion to adjourn. Jay seconded.