Final Remedial Investigation Report Former Umiat Air Force Station Landfill Umiat, Alaska

Contract W911KB-08-D-0005, Task Order 0012

Prepared For:

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ACRONYMS AND ABBREVIATIONS

4,4'-DDD	4,4'-dichlorodiphenyldichloroethane
4,4'-DDE	4,4'-dichlorodiphenyldichloroethene
4,4'-DDT	4,4'-dichlorodiphenyltrichloroethane
ADEC	Alaska Department of Environmental Conservation
ADOT&PF	Alaska Department of Transportation and Public Facilities
AFS	air force station
AGRA	AGRA Earth & Environmental, Inc.
ARAR	applicable or relevant and appropriate requirements
ASNA	Arctic Slope Native Association
ATSDR	Agency for Toxic Substances and Disease Registry
bgs	below ground surface
BLM	U.S. Bureau of Land Management
BNA	base-neutral-acid extractible compounds
BTEX	benzene, toluene, ethylbenzene, and xylenes
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cfs	cubic feet per second
CHPPM	U.S. Center for Health Promotion and Preventive Medicine
COPC	contaminant of potential concern
CSM	conceptual site model
DERP	Defense Environmental Restoration Program
DoD	U.S. Department of Defense
DoI	U.S. Department of the Interior
DRO	diesel range organics
E&E	Ecology and Environment, Inc.
EM	electromagnetic
EPA	U.S. Environmental Protection Agency
ERA	ecological risk assessment
F	Fahrenheit
FAA	U.S. Federal Aviation Administration
FS	feasibility study
FUDS	Formerly Used Defense Site
g	grams
GPR	ground-penetrating radar
GRO	gasoline range organics
HTRW	hazardous, toxic, and radioactive waste
IRP	Installation Restoration Program
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
NOAA	National Oceanic and Atmospheric Administration
NPR	National Petroleum Reserve
NSB	North Slope Borough

ACRONYMS AND ABBREVIATIONS, CONT'D.

PAH	polynuclear aromatic hydrocarbons
PCB	polychlorinated biphenyl
PCL	Potential cleanup level
PCDDs	polychlorinated dibenzo-p-dioxins
PDDFs	polychlorinated dibenzofurans
POLs	petroleum, oil, and lubricants
PQL	practical quantitation limit
PRG	preliminary remediation goal
RAO	remedial action objective
RBC	risk-based concentration
RBSL	risk based screening level
RCRA	Resource Conservation and Recovery Act
RI	remedial investigation
RRO	residual range organics
SQuiRTs	Screening Quick Reference Tables
SVOC	semivolatile organic compound
TBC	to be considered
UIC	Ukpeagvik Iñupiat Corporation
USACE	U.S. Army Corps of Engineers
USGS	US Geological Survey
VOC	volatile organic compound
µg/kg	micrograms per kilogram
μg/L	micrograms per liter

EXECUTIVE SUMMARY

The former Umiat Air Force Station (AFS) is located along the Colville River in the arctic foothills north of the Brooks Range, Alaska, approximately 120 miles southwest of Prudhoe Bay, 170 miles southeast of Barrow, and 65 miles southwest of Nuiqsut. Umiat AFS was used by the U.S. Navy from 1945 to 1946 and a major staging area for Department of Defense (DoD) and private oil exploration. Since then, the station has been used as a staging area and base camp by various federal and state agencies to support a variety of activities in the National Petroleum Reserve – Alaska (NPRA) and adjacent areas.

The subject of this remedial investigation (RI) is the approximately 8-acre landfill about one-half mile east of the main station facilities, within an ephemeral slough of the Colville River (see Figure 2-1). Records indicate the landfill may have been used for dumping wastes as early as 1943 and as recently as 1981, including wastes generated during a 1973 site-wide demolition and cleanup effort. The landfill has no surface markers indicating its location or boundaries.

Since 1973, a number of site inspections and investigations have been conducted at the former Umiat AFS and landfill by the United States (US) Environmental Protection Agency (EPA), Alaska Department of Environmental Conservation (ADEC), Alaska Department of Transportation and Public Facilities (ADOT&PF), Federal Aviation Administration (FAA), and US Army Corps of Engineers (USACE). Remedial investigations were performed in 1994, 1996, and 1997. Additional field investigations were performed in 1998 and 1999, and a limited removal action was performed in 2001. Several studies have been conducted to evaluate whether contamination from past activities at the former Umiat AFS may affect human health and ecological receptors. These studies have focused on chemicals detected in fish tissue and their potential effects on recreational and subsistence users.

Environmental media sampled during these investigations included surface and subsurface soil, sediment, groundwater, surface water, and fish tissue. Our evaluation of data generated during those investigations shows the chemicals of potential concern (COPCs) to be total polychlorinated biphenyls (PCBs; specifically Aroclor 1254), 4,4'-dichlorodiphenyl dichloroethane (4,4'-DDD), 4,4'-dichlorodiphenyl dichloroethylene (4,4'-DDE), 4,4'-dichlorodiphenyl trichloroethane (4,4'-DDT), diesel range organics (DRO), naphthalene, methylene chloride, and lead. Based on a cumulative risk evaluation, the carcinogenic risk posed to human health by these contaminants exceeds the risk management standard of 1 x 10^{-5;} the non-carcinogenic hazard index exceeds the risk management standard of 1. In addition, PCBs, DDT, DDD, and DDE have been detected in fish samples in the vicinity of Umiat.

The Colville River floods the seasonal stream and landfill areas annually, typically in spring and fall. Water velocities during these events can be high enough to erode and redeposit sand and gravel that covers the landfill, exposing landfill debris. These flood events have uncovered hazardous materials and inert solid wastes, and transported contamination off-site to downstream sediments.

There is a consensus among various studies that the landfill occupies about 8 acres; however, there is disagreement on the basal depth of debris burial. Two studies (Ecology & Environment in 1994 and GeoTek in 2011) suggest burial depths ranging from approximately 8 feet to 18 feet below ground surface (bgs); the U.S. Geological Survey (USGS); in 2005) and anecdotal evidence from past site users suggest burial depths of 40 feet bgs or more.

Landfill-cover erosion and subsequent exposure of potentially contaminated debris and soil is an on-going process, likely to result in future releases of COPCs to the environment. In 2001, a small transformer and areas containing debris from lead-acid batteries were observed on the surface of the landfill; these objects were subsequently removed by the USACE.

The landfill reportedly contains equipment, scrap metal, and crushed drums. Buried debris is also known to include possible contaminant sources such as lead-acid batteries and transformers, and suspected to include other containers with unknown contents and contaminated soil. Debris observed at the landfill surface during recent site visits included scrap metal, wire, pipe, pipe fittings, drill bits, at least a half-dozen drum carcasses, and drill-rig tracks. The environmental sampling, geophysical assessments, and historical information we reviewed for this RI have provided a depiction of the landfill as a whole. Information yielded by these sources has not identified distinct contaminant sources within the landfill that may be targeted for a limited removal.

Further action at the landfill is recommended. Hazardous materials are known to be present; contaminants have been detected above acceptable risk levels and regulatory limits in soil, sediment, surface water, and fish tissue; and landfill-cover erosion is an on-going process. For these reasons, it is recommended interim and/or permanent remedial actions be undertaken to reduce the potential for contaminant exposure to humans and ecological receptors.

A feasibility (FS) study will be prepared, based on reference materials cited and conclusions presented in this RI, to identify and evaluate a range of remedial alternatives to mitigate risks posed by the landfill to human health and the environment.

FINAL REMEDIAL INVESTIGATION REPORT FORMER UMIAT AIR FORCE STATION LANDFILL UMIAT, ALASKA FUDS F10AK0243

1.0 INTRODUCTION

This RI report presents the results of a review of site-characterization data from the landfill associated with the Umiat AFS, Alaska. Umiat is about 175 miles southeast of Barrow and 65 miles southwest of the Village of Nuiqsut on the north slope of Alaska (Figure 1-1). The Umiat AFS was used by the U.S. Navy or its civilian contractors for petroleum exploration purposes from 1945 to 1954, at which time ownership returned to the Air Force. The station has been used as a staging area and base camp by various federal and state agencies and private entities to support a variety of activities in the NPRA and adjacent areas. Environmental investigations have been performed at several sites at the AFS. The subject of this RI is the facility's former landfill, about one-half mile east of the station's main gravel pad (Figure 1-2).

This RI report was developed using information collected by others during several site investigations and removal actions dating to the mid-1970s; no additional data were collected for this RI. This RI was prepared by Shannon & Wilson, Inc. (Shannon & Wilson) under Hazardous, Toxic, and Radioactive Waste (HTRW) Contract W911KB-08-D-0005, Task Order 0012, and in general accordance with the USACE Revised Statement of Work dated August 29, 2011, and our proposal dated September 15, 2011.

The scope includes preparing an RI report and conducting an FS. The RI report has been submitted in draft, interim final, and final form; the FS report will also be submitted in draft, interim final, and final forms. The draft and interim final versions of the RI were submitted to the USACE, ADEC, and the U.S. Bureau of Land Management (BLM) for review and comment; this final RI report incorporates those comments. Appendix A includes USACE, ADEC, and BLM comments on the draft and interim final RI reports, and Shannon & Wilson responses to those comments.

This RI was prepared in accordance with the USACE Formerly Used Defense Site (FUDS) Program Policy Manual (ER 200-3-1). As proscribed by the FUDS manual, response activities undertaken by the USACE as part of the FUDS program that address hazardous substances, pollutants, or contaminants shall be conducted in accordance with the provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The work followed the process outlined in the EPA's Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (EPA, 1988).

1.1 Project Objectives

The objectives of this RI are to:

- adequately characterize the site for the purpose of developing and evaluating effective remedial alternatives;
- evaluate the nature and extent of contamination in soil, water, and sediment due to past uses at the Former Umiat AFS landfill; and
- provide information to assess the risks to human health, safety, and the environment.

This RI report describes the nature and extent of chemical contamination in soil, groundwater, surface water, sediment, and fish, and discusses risks to human health and the environment posed by contamination remaining at the landfill. A range of remediation alternatives addressing these risks will be developed and evaluated in the FS.

1.2 RI Report Organization

This RI is based on information and data collected and previously reported by others, obtained by Shannon & Wilson through the USACE and other public sources. The RI report is organized into seven sections, including this introduction. A summary of the site history and environmental setting of the landfill is presented in Section 2.0. The restoration program status and regulatory environment is summarized in Section 3.0. Section 4.0 describes previous investigations and removal actions at the site and summarizes their findings. Section 5.0 describes the methods used to identify COPCs and evaluate cumulative risk. Section 6.0 presents the evaluation of existing data with respect to regulatory levels, results and conclusions of the RI, and qualitative conceptual site models (CSMs) that describe potential exposure routes and receptors. Section 7.0 lists the references cited in this report. Figures and tables follow their corresponding section. Appendices B through G to this report contain supporting information.



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2.0 UMIAT AIR FORCE STATION AND LANDFILL DESCRIPTION

Throughout this report, the former Umiat AFS is referred to as the "station" or "facility" and the landfill as the "site." The landfill has been variously referred to in other reports as the Unit C Landfill, Area 11, Area of Concern 7, and East Landfill.

2.1 Site Location

The former Umiat AFS is at 69 degrees 22 minutes North Latitude, 152 degrees 08 minutes West Longitude. The geographical location of the station is within Sections 9, 10, and 15, Township 1 South, Range 1 West, Umiat Meridian. The Umiat AFS is shown on the USGS Umiat (B-4) Alaska quadrangle map. Umiat lies within the Colville River valley north of the Brooks Range in northern Alaska, within the NPRA. It is about 120 miles southwest of Prudhoe Bay and 300 miles northwest of Fairbanks, as shown in Figure 1-1. The nearest community is Nuiqsut, approximately 65 overland miles and 85 river miles northeast of the station.

2.2 Umiat AFS Description, History, and Ownership

The Umiat area was designated a part of the 22.8-million-acre Naval Petroleum Reserve (NPR) on February 27, 1923, by Executive Order 3797-A. Umiat was developed in 1945 by the U.S. Navy within Naval Petroleum Reserve Number 4 (NPR-4; now known as the NPRA). A series of land orders issued during World War II (WWII) opened the area to coal mining and oil and gas exploration. The airfield was originally constructed as an emergency airstrip during WWII. In 1945, Umiat became a supply and operation base for petroleum exploration conducted by the Navy in NPR-4. Between 1945 and 1954, the Navy or its contractors installed 11 oil-exploration wells near Umiat; six of the 11 wells were within the U.S. Air Force (USAF) Station boundary and five wells were outside the boundary. The Umiat AFS, comprising 8,000 acres, was obtained by transfer letter from the Department of the Navy to the Department of the Air Force in 1954 (USACE, 2009; Figure 2-1).

The Air Force planned an Aircraft Control and Warning Station at Umiat; however, the facility was never constructed. The USAF used the station intermittently until 1959, when it was transferred back to the Navy. In 1977, the site was transferred to the U.S. Department of the Interior (DOI) as a result of Public Law 94-258, the Naval Petroleum Reserve Act of 1976. The DOI later transferred a portion of the site, including the airfield and buildings, to the State of Alaska.

Ownership and management jurisdiction over Umiat is currently divided between the ADOT&PF and BLM. The ADOT&PF owns 115 acres of the former Umiat military property, including the airfield, and grants leases for buildings and space to the FAA, BLM, and private

interests. The BLM manages lands surrounding the former Umiat AFS, including the Colville River (as part of the public lands within the NPRA). The Arctic Slope Regional Corporation also owns land west of the Umiat AFS and has selected other land as part of their regional entitlement.

The Umiat main camp area includes an east/west trending, 5,400-foot gravel airstrip and operations complex. The operations complex has historically comprised a number of Quonset huts and other structures used for housing and dining, material and equipment storage and maintenance, and power generation. Ukpeagvik Iñupiat Corporation (UIC) UMIAQ leases and operates a seasonal camp (lodge and dining facility), commercial aviation-fueling facilities, and a diesel-powered generator. Other agencies, including the BLM, USGS, Alaska Department of Fish & Game (ADFG), and FAA, operate facilities at Umiat.

Individually-owned diesel-powered generators provide electricity to the Umiat facilities. Since the Umiat camp's establishment, water has been obtained from nearby lakes and the Colville River. The Station is accessible by aircraft year-round, small boats during the summer, and by overland transit in winter.

2.3 Landfill History and Description

The landfill is in a slough of the Colville River; it has no surface features indicating its location or boundaries. The slough runs about a half-mile before rejoining the Colville River. Water may be present in the slough for about four months of the year, mainly after spring ice breakup and during heavy rain events. This is referred to as the seasonal stream (ATSDR, 2003).

From 1944 to 1973, raw sewage was collected in 55-gallon drums for disposal at what was called the "east landfill" along the water haul road east of the camp to the Colville River, and is believed to be the subject landfill. Solid-waste disposal practices prior to 1946 are not known. From 1946 to 1973, the east landfill was used for disposal of solid waste (E&E, 1996).

In 1973, the Naval Petroleum Oil Shale Reserves contracted Pacific Architects and Engineers, Inc., to clean up the Umiat camp. Four-hundred and nine tons of junk equipment and scrap metal and approximately 86,600 crushed drums were reportedly buried in "stable areas of the flood plain." Most of the drums were buried at the east landfill, including 7,091 drums hauled from the surrounding exploratory-well sites (E&E, 1996).

During an inspection of Umiat in 1974, the ADEC identified new waste-management problems created by two Navy geophysical contractors. Each company's camp started its own solid-waste dump on top of the east landfill (E&E, 1996).

The ADEC again inspected Umiat in 1976. Debris buried during the 1973 Navy cleanup was exposed in "isolated locations" as floodwaters of the Colville River receded. ADEC did not identify these locations, which may be the east landfill, a burial location near Umiat Test Well No. 5, or an undocumented burial site (E&E, 1996).

During a 1981 site inspection conducted for the EPA, E&E identified these concerns and noted the Navy Arctic Research Laboratory (NARL) was using a landfill in a dry channel of the Colville River, east of the site (E&E, 1996).

In 1992, the ADEC received reports from Nuiqsut residents, hunting guides, and lessees working in the area that the old landfill was exposed by the Colville River, revealing batteries, transformers, and oil drums. Later that year, the USACE contracted E&E to perform a visual inspection of Umiat to update previous information and document additional areas at the site for further investigation, resulting in the identification of 11 areas of concern. In 1994, E&E performed a remedial investigation that included collecting 143 surface and subsurface soil samples (E&E, 1996). This and other environmental investigations are summarized in Section 4.1

Debris observed at the landfill during recent site visits included scrap metal, wire, pipe, pipe fittings, drill bits, at least a half-dozen drum carcasses, and drill-rig tracks (USACE, 2010). In late May/early June 2011, a representative from the BLM photographed flooding of the Colville River over the Umiat landfill area and observed areas of erosion and exposed debris (USACE, 2011b).

2.4 Aerial Photography

Appendix B includes selected photos of the Umiat landfill and surrounding area. These include photographs taken in August 1974 (black and white), August 1976 (color), and August 2001 (color). The 1974 photograph appears to show the landfill as a roughly rectangular, level cleared area intersected by the access road from the Umiat station to the Colville River. Some objects are present on the ground surface at the landfill, which may be waste materials, and sparse vegetation can be seen. The 1976 color photograph shows conditions similar to those in 1974 but a greater number of items are present at the ground surface atop the landfill, which more clearly shows ongoing use of the landfill. By 2001, no surface debris is apparent and vegetation has grown over much of the landfill area north and south of the access road.

2.5 Environmental Setting

2.5.1 Physical Environment

2.5.1.1 Climate

Umiat is in an area defined as part of the Arctic Climatic Region. Due to the length of daylight hours and extreme northern latitude, summer and winter temperatures vary greatly. The average temperature for July is 53.2 degree Fahrenheit (°F), and the average temperature in February drops to -24.4 °F. The average annual temperature is 10.7 °F.

The average annual precipitation for Umiat is 5.4 inches, about 1 inch of which typically falls in August, classifying the region as arid. Umiat averages 33.7 inches of snowfall annually. Prevailing winds blow from the west November through April, and from the east May to October. The average annual wind speed is 6.9 miles per hour (USACE, 2009).

2.5.1.2 Physiography

Umiat is in the northern foothills of Alaska's Brooks Range. The foothills generally slope to the north, with elevations ranging from 3,500 feet in the south to 400 feet in the north. Regionally, Umiat is located along the Colville River Valley. Major streams and rivers, such as the Colville River, have downcut through the sandstone and shale, creating high vertical bluffs. Umiat AFS is built on alluvial deposits; there are no sandstone or shale outcrops near the landfill.

2.5.1.3 Geology

Unconsolidated deposits of the Colville River floodplain near Umiat primarily consist of interbedded alluvial gravel, sand, and silt of Quaternary Age. These deposits are estimated to be 20 feet to 70 feet thick. In some areas, the Quaternary alluvium is overlain by an organic mat of unknown thickness and underlain by late Cretaceous sandstones, shales, and conglomerates associated with the uplift of the Brooks Range. The active layer (the interval of soil that freezes and thaws each year) is assumed to be approximately 2 feet to 3 feet thick in the undisturbed tundra; however, it is estimated to vary from 4 feet to 6 feet thick in gravel-pad areas. At the former Umiat AFS, permafrost is ubiquitous in the subsurface and believed to extend to depths of 1,000 feet or more bgs. The gravel pad and airstrip at Umiat consist mostly of poorly graded sandy gravels excavated from the river floodplain with a maximum size of about 6 inches. In the undeveloped wetland areas adjacent to the gravel pads and roadways, the main sediment type exposed at the surface is organic-rich silt. This silt occurs in thickness of up to approximately 8 feet and overlies the sandy gravels of the Colville River floodplain (E&E, 1997).

Uplift of the Brooks Range produced east-west-trending anticlinal folds in the strata. Umiat is on a major fold known as the Umiat anticline, where numerous small oil seeps were investigated by the Bureau of Mines in 1943. As a result of the oil seeps, oil exploration began in the former Umiat AFS vicinity along the Umiat anticline. There is an oil seep in the Colville River riverbed upstream of Umiat Mountain, and downstream of the former Umiat AFS Main Gravel Pad, airstrip, and landfill (E&E, 1997).

2.5.1.4 Surface-Water Hydrology

Surface water occurs as rivers, streams, shallow ponds, and lakes near the former Umiat AFS. The major surface-water feature in the Umiat area is the Colville River, which drains the north slope of the Brooks Range and has a drainage area of 13,830 square miles. The river flows to the east (and eventually north), discharging into the Arctic Ocean. Flooding commonly occurs in the lower reaches of the river because of snowmelt, rainfall, and ice jamming. The mean annual surface-water runoff for the Umiat vicinity is about 1 cubic foot per second per square mile of drainage basin above the point of measurement. Runoff into the Colville River is at a minimum during the winter months.

The landfill is on a gravelly inside meander within the active floodplain of the Colville River. During spring snowmelt, the high water of the Colville River overflows into a seasonal stream between the former Umiat AFS and Colville River. The seasonal stream runs across the landfill surface. There is another stream west of the landfill, which merges with the seasonal stream north of the landfill. During high water, the landfill is surrounded by the western stream and Colville River. Except during high-flow periods of spring runoff, the upper end of the seasonal stream is typically cut off from the Colville River, and the lower reaches of this channel act as a backwater. The size of this backwater area expands and contracts throughout the summer in response to changing levels of the Colville River (Jacobs, 2003).

The USGS measured discharge data for the Colville River at Umiat from August 2002-09. The water gauge is on the left bank (facing downstream) of the river, at the upstream end of the landfill and seasonal slough. Peak flows in May and June have been measured from 173,000 to 261,000 cubic feet per second (cfs; USACE, 2011a).

2.5.1.5 Groundwater and Permafrost

Groundwater occurs in three zones in the Umiat area: suprapermafrost, thaw bulbs beneath lakes and rivers, and deep bedrock aquifers beneath permafrost (USACE, 2009). Groundwater occurring in unconsolidated sediments above permafrost is called suprapermafrost, and groundwater that occurs below continuous permafrost is subpermafrost. Shallow suprapermafrost groundwater occurs in the unconsolidated alluvial deposits at Umiat. The thickness of this suprapermafrost alluvial aquifer is variable because of thaw bulbs beneath lakes and rivers that do not freeze to the bottom during winter, and developed areas such as the gravel pad and roadways.

Permafrost was observed in 29 of the 259 soil borings advanced in the Umiat area. Groundwater extends from the water table to the top of permafrost; the top of permafrost is commonly 2 feet to 3 feet bgs in wetlands and undeveloped areas, and as deep as 15 feet bgs, but is highly variable in developed and gravel-pad areas. Based on soil-boring logs from the 1994 and 1996 RIs, E&E determined the top of the shallow suprapermafrost groundwater near Umiat is commonly found between 2 feet and 5 feet bgs.

Deep subpermafrost groundwater at Umiat has been encountered at 3,303 feet and 6,212 feet bgs in deep bedrock aquifers and is brackish or saline (USACE, 2009). The 1996 remedial investigation results indicated the groundwater gradient in the suprapermafrost alluvial aquifer is fairly flat, generally flowing toward the north and east; however, the flow direction is altered locally by depth to permafrost, stratigraphy, surface-water bodies, and water uptake by vegetation. Groundwater likely drains into Seabee Creek (just north of the runway) and the Colville River (Jacobs, 2003).

Suprapermafrost groundwater is assumed to be hydrologically connected to the nearby Colville River. The water-table elevation probably fluctuates in response to the stage of the river and depth of permafrost. River flooding probably has the greatest influence on groundwater elevation, flow direction, and gradient.

At Umiat, no wells are known to have been drilled into suprapermafrost or subpermafrost aquifers to obtain potable water. No evidence was found that groundwater in the Umiat area has been investigated as a potential drinking-water source (E&E, 1997a).

2.5.2 Biological Resources

2.5.2.1 Vegetation

The region surrounding Umiat AFS is mostly treeless and vegetated with grasses and herbaceous plants that tolerate high soil moisture. In general, the area is densely vegetated with 6- to 12-inch-tall dwarf shrubs, dwarf birches, and willows mixed with herbaceous species and, in places, 3- to 8-foot-tall alders and willows. Vegetation is divided between the willow/alder and tundra-plant communities. Willows and alders are found in formerly disturbed areas, surrounding water bodies, on gravel bars, and along the Colville River. Willows dominate the floodplain. The

tundra-plant community comprises heath tundra and dwarf shrubs. Sedge-grasses occur in poorly drained areas and around ponds and lakes (USACE, 2009).

2.5.2.2 Wildlife and Fish

Large mammals in the Umiat area or that migrate through the area include moose, caribou, and brown bear. Moose along the Colville River are at the northern extent of the species' range. The Teshekpuk Lake caribou herd migrates through the Umiat area. Brown bears travel along the Colville River corridor and other nearby river corridors and feed in riparian habitats in spring and summer. Furbearing animals in the Umiat vicinity include wolves, arctic and red foxes, and wolverines. Small mammals that may inhabit the area include hares, ground squirrels, collared lemmings, arctic shrews, and mink (USACE, 2009).

The Colville River corridor provides important breeding and brooding habitats for numerous migratory birds, including Canada geese. The willow ptarmigan, rough-legged hawk, peregrine falcon, Savannah sparrow, and Lapland longspur are known to use habitat surrounding Umiat. Peregrine falcons and rough-legged hawks may begin to nest along river bluffs as early as March (USACE, 2009).

The Colville River supports most species of freshwater and anadromous fish found in the Beaufort Sea drainages of Alaska. Pink and chum salmon spawn in the lower river, but are not known to occur in the river stretch adjacent to the Umiat area. Cisco, whitefish, grayling, burbot, arctic char, Dolly Varden, stickleback, and northern pike are among the fish species present in the Colville. Several of these species are important in local subsistence and commercial economies (USACE, 2009).

2.6 Demographics and Land Use

2.6.1 Subsistence Activities

Subsistence can be defined as "hunting, fishing, and gathering for the primary purpose of acquiring traditional food." Mr. Michael Pederson of Arctic Slope Native Association Ltd. (ASNA) noted, "Subsistence hunters use Umiat mostly as an area to pass through during hunting season. Hunters may spend several weeks in the area, but usually spend no more than a week of opportunistic/ recreational fishing in the Colville River. Pederson also stated subsistence hunters probably do not fish within 5 miles of Umiat; therefore, they are not expected to fish in the ... (Umiat landfill) seasonal stream and slough. Subsistence hunters may, however, catch broad whitefish, arctic cisco, and arctic grayling in the Colville River outside the immediate Umiat area" (E&E, 1998).

Primary subsistence resources for Nuiqsut residents are bowhead whales, caribou, fish, ptarmigan, and waterfowl and, of lesser importance, seals, musk oxen, and Dall sheep (Hoefler Consulting Group, 2001). The use of these fish as part of a subsistence diet has a high cultural and nutritional significance. The community of Nuiqsut fishes along much of the Colville River, including areas near Umiat, and relies on fish from the Colville River as part of their subsistence lifestyle (ATSDR, 2003).

The primary historic use of the area was subsistence hunting and fishing by the nomadic people of Anaktuvuk Pass, and residents of Wainwright and Barrow. Residents in the villages of Nuiqsut, Wainwright, and Anaktuvuk Pass still subsist on wildlife resources that migrate through the area (AGRA, 1997a). The combined population of these villages in 2011 was 1,331 (Alaska Department of Labor estimate).

2.6.2 Historical and Cultural Resources

There are 12 historic properties in and around Umiat listed on the Alaska Heritage Resources Survey. They comprise two lithic scatters (surface scatters of cultural artifacts and debris), the 11 nearby Navy test wells, the remains of the post-WW II oil-exploration camp, the camp itself, an engine-generator building, and a non-directional beacon (USACE, 2009). The landfill is not considered an historic property.



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3.0 POTENTIAL APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

CERCLA Section 121 (d)(1) requires that remedial actions be protective of human health and the environment. In addition, CERCLA Section 121 (d) requires remedial actions meet federal or state standards, requirements, criteria, or limitations that are legally applicable or relevant and appropriate, unless those requirements are waived pursuant to Section 121 (d)(4) under appropriate site-specific circumstances. These requirements are commonly referred to as Applicable or Relevant and Appropriate Requirements (ARARs).

According to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) at 40 CFR 300.5, *applicable requirements* means those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a CERCLA site. Only those state standards identified by a state in a timely manner and more stringent than federal requirements may be applicable.

Relevant and appropriate requirements means those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that, while not "applicable" to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well suited to the particular site. Only those state standards identified in a timely manner and more stringent than federal requirements may be relevant and appropriate.

There are three categories of ARARs: chemical-, location-, and action-specific. These requirements were used in this RI to develop project remedial-action objectives (RAOs) and will be used in the FS to develop appropriate remedial-action alternatives. Potential ARARs include environmental laws such as the State of Alaska Oil and Hazardous Substances Pollution Control Regulations, Water Quality Standards, Drinking Water Standards, and Solid Waste Management regulations, and federal RCRA, Safe Drinking Water Act, Clean Air Act, Clean Water Act, and Solid Waste Disposal Act.

Petroleum, oil, and lubricant (POL)-contaminated sites fall under the CERCLA petroleum exclusion and are therefore addressed under the Defense Environmental Restoration Program (DERP), as authorized in United States Code, Title 10, Section 2701, et seq. The DERP provides authority to clean up petroleum releases that pose an imminent and substantial endangerment to public health, welfare, or the environment. Alaska's Site Cleanup Rules (18 AAC 75 Article 3 Oil and Other Hazardous Substances Pollution Control) are risk-based and indicative of when an imminent and substantial endangerment to the public health or welfare or the environment has been mitigated.

Potential chemical-specific ARARs are identified in this RI and have been used to guide the evaluation of the nature and extent of contamination at the Umiat landfill. Location- and action-specific ARARs will be identified during the FS phase of the project and discussed in the FS report.

3.1.1 Chemical-specific ARARs

Chemical-specific ARARs define acceptable exposure concentrations or water-quality standards and are used in establishing preliminary remediation goals (PRGs). They are medium-specific laws and requirements that regulate the release to the environment of materials possessing certain chemical or physical characteristics. These requirements generally set health- and riskbased concentration limits for hazardous substances. If a chemical is subject to more than one discharge or exposure limit, the more stringent of the requirements is generally applied.

Chemical-specific requirements establish the acceptable concentration of a contaminant that may be found in or discharged to the environment. They form the basis for the development of RAOs. Potential chemical-specific ARARs for the Umiat landfill are found in the Oil and Other Hazardous Substances Pollution Control Regulations in Alaska Administrative Code (18 AAC 75) but may also include Alaska Water Quality Standards (18 AAC 70). Table D-1 (Appendix D) summarizes potential chemical-specific ARARs for the Umiat landfill.

4.0 SUMMARY OF EXISTING DATA

This section summarizes previous site investigations, site visits, and removal actions that included site observations and/or characterization of suspected contaminated environmental media (soil, groundwater, surface water, and sediment). Section 5 presents a discussion of screening and cleanup levels. Section 6 completes the evaluation with a discussion of site data and observations compared to screening and cleanup levels and presents a cumulative risk evaluation. Areas of concern associated with the former Umiat AFS were identified beginning in 1972. Many of those areas were the subject of subsequent investigations and removal actions. This RI focuses on the Umiat landfill.

We refer to the investigations by the year the field work was performed, not the year the associated report was completed, i.e., the "1996 RI" field work was performed in 1996, but the report was dated June 1997. Table 4-1 presents summary information on the documents we reviewed for this RI.

Analytical results were compiled from a number of investigations further discussed in this section. The following sections do not include discussions of sampling or characterization of areas not associated with the landfill and seasonal stream/slough. Table 4-2 summarizes the type (matrix) of environmental samples and corresponding analyses performed on samples from the Umiat landfill and seasonal stream/slough, as well as background locations. The results and observations from these investigations are summarized in the following subsections. Previous investigations included analytical results with flags qualifying the data; in some cases these flags were undefined. Refer to Appendix F results tables for the original flags, and the original reports for definitions of flags, where available.

4.1 Environmental Investigations and Removal Actions

In 1972, the ADEC first identified environmental concerns at the former Umiat AFS with the discovery of a 4,4'-DDT cache in an old Navy warehouse at the site. During a subsequent site visit that year, the ADEC inventoried the quantity of 4,4'-DDT and notified the Naval Petroleum Oil Shale Reserves branch of their concerns. In 1973, the Naval Petroleum Oil Shale Reserves contracted Pacific Architects and Engineers, Inc., to remove and dispose of 5,660 pounds of 4,4'-DDT from the former Umiat AFS. During the same removal action, abandoned equipment, scrap metal, and approximately 85,000 crushed drums were buried in "stable areas of the (Colville River) floodplain." This area was referred to as the Unit C Landfill by E&E. Shannon & Wilson refers to the Unit C Landfill as "the landfill" in this RI.

Since 1973, a number of site inspections and investigations have been conducted at the former Umiat AFS and landfill by the EPA, ADEC, ADOT&PF, FAA, and USACE. During these

investigations, many contaminant sources were identified, including oil-spill sites, several solidwaste dumps, and leaking 55-gallon drums and PCB-containing transformers. Debris buried at the landfill was observed at the ground surface as the area flooded and its gravel cover eroded. Reports on these early investigations were not reviewed for this RI.

In 1992, E&E performed a visual inspection of Umiat and identified 11 areas of concern. The USACE contracted E&E to perform RIs at the Umiat landfill in 1994, 1996, and 1997. These, in addition to their 1998 and 1999 field investigations, and two other investigations in which analytical samples were collected at the landfill, are described in the following subsections. These studies included additional areas of, or related to, the former Umiat AFS; however, only analytical results associated with the landfill are presented in this RI.

4.1.1 1986 USACE Alaska District Hazardous-Waste Sampling and Analysis

The USACE initiated a hazardous-waste sampling and assessment program at Umiat in 1986, under the DERP. Analytical samples were collected from areas of obvious POL contamination and areas suspected to be heavily used, including the landfill east of the site. The USACE collected one sediment and one surface-water sample; the simplified sample location map appears to show the samples downstream (north) of the landfill in the seasonal stream channel. The samples were analyzed for PCBs, pesticides, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and EP Toxicity for metals. The purpose of analyzing samples for EP Toxicity was to determine whether site-sampled media might be considered hazardous waste under the RCRA. 4,4'-DDT was detected in the water sample at 0.0003 milligrams per liter (mg/L). 4,4'-DDD was detected at 0.650 mg/kg and the PCB Aroclor 1254 was detected at 0.680 milligrams per kilogram (mg/kg) in the sediment sample. Diesel-range hydrocarbons were tentatively identified in the sediment sample at 10 mg/kg. EP Toxicity analysis indicated the metals concentrations were below regulatory limits. Figure 4-1 shows the approximate location of the two samples.

4.1.2 1994 Ecology & Environment Phase I Remedial Investigation

E&E performed the first phase of an RI at Umiat Air Force Station in 1994 to determine the horizontal and vertical extent of soil contamination at the 11 areas identified during their 1992 site inspection, of which the landfill was Area 11. E&E estimated the boundaries of the landfill with an electromagnetic (EM) geophysical survey. The EM instrument readings indicated an estimated 67,000 cubic yards (cy) of buried metallic debris at least as deep as 9 feet bgs. Refer to section 4.3.1 for further discussion of the geophysical survey.

They drilled six shallow boreholes at the landfill outside the debris areas (Figure 4-2) and two soil borings at background locations. The landfill borings were drilled to about 9 feet bgs and did not encounter permafrost. They collected six surface and 12 subsurface soil samples at the landfill. The soil samples were tested for fuel constituents, PCBs, pesticides, VOCs, and metals. DRO and total recoverable petroleum hydrocarbons (TRPH) were detected in all the landfill borings. 4,4'-DDT was detected at the surface, 2-foot, and 10-foot depths, ranging from 0.020 mg/kg to 0.050 mg/kg in one borehole (BH 11-6).

4.1.3 1996 E&E Phase II RI

E&E performed the Phase II RI at the former Umiat AFS in 1996. The RI focused on three main areas: the Airstrip Operations Complex and Runway Lake (Unit A), the Main Gravel Pad and Floatplane Lake (Unit B), and the Landfill and associated seasonal stream (Unit C). Their Phase II report incorporated Phase I findings (presented previously in their draft Phase I RI report).

The objectives of the Phase II RI at the landfill were to:

- delineate soil and characterize groundwater contamination (POLs, pesticides, metals, and PCBs);
- collect soil samples from known areas of contamination for risk assessment;
- collect surface-water and sediment samples from the Colville River and two area lakes for risk assessment; and
- define possible contaminant migration pathways (surface water and groundwater) to potential receptors (the Colville River and surface-water bodies).

E&E collected surface- and subsurface-soil, groundwater and surface-water, and sediment samples at the landfill. They also conducted a survey of the site. Figure 4-3 shows E&E's 1996 RI landfill sample locations.

E&E drilled 12 soil borings at the landfill and completed six of these as monitoring wells (three temporary and three permanent). The borings were drilled to about 9 feet bgs. Permafrost was reported to be discontinuous and variable from 3 feet to 6 feet bgs in the borings south of the road crossing the landfill. Permafrost was not reported in borings north of the road. Detected concentrations of DRO and residual range organics (RRO) in landfill soils ranged from 5.1 mg/kg to 1,300 mg/kg and 15 mg/kg to 4,100 mg/kg, respectively. Monitoring well MW-6 in the northern portion of the landfill was an exception, with DRO (1,300 mg/kg), RRO (4,100 mg/kg), 4,4'-DDT (38.2 mg/kg), and 4,4'-DDD (31.4 mg/kg) detected at the groundwater interface (about 3 feet bgs). PCBs (Aroclor 1254) were also detected in soils at the groundwater

interface in MW-8 and SB-47 (0.0418 mg/kg and 0.224 mg/kg, respectively). GRO (0.119 mg/L to 0.761 mg/L), DRO (0.178 mg/L to 76 mg/L), 4,4'-DDD (0.0173 mg/L), and 4,4'-DDT (0.000105 mg/L to an 0.0311 mg/L) were also detected in groundwater samples at the landfill.

Surface-soil samples at the landfill contained lead (598 mg/kg), arsenic (1.8 mg/kg to 8.4 mg/kg), beryllium (0.07 mg/kg to 0.37 mg/kg), and iron (5,590 mg/kg to 27,800 mg/kg). The lead was attributed to lead-acid batteries and believed to be localized.

DRO and/or GRO were detected in groundwater samples from each of the six Phase II monitoring wells. The three wells along the centerline of the seasonal stream flowing through the landfill (MW-4, MW-6, and MW-8) contained higher petroleum concentrations than wells along the perimeter of the landfill (MW-3, MW-5, and MW-7). DRO detections ranged from 0.151 mg/L to 76.1 mg/L and GRO detections ranged from 0.119 mg/L to 0.761 mg/L. Chlorinated pesticides (4,4'-DDT and 4,4'-DDD; 0.0311 mg/L and 0.0173 mg/L, respectively) were detected in groundwater where they were found in subsurface soil (MW-6).

Surface water and sediment samples were collected in the seasonal stream exiting the landfill. Surface-water samples were analyzed for VOCs, PCBs/pesticides, polynuclear aromatic hydrocarbons (PAHs), and metals. No detections of PCBs, pesticides, or PAHs were reported; acetone and metals were detected. The PCB Aroclor 1254 was detected in each of the three sediment samples at 0.156 mg/kg to 17.8 mg/kg (locations LA, LB, and LC, shown on Figure 4-3). The density of sampling points in the Phase II fieldwork did not delineate the extent of contamination, and further delineation was recommended.

4.1.4 1996 AGRA Environmental Site Assessment

AGRA performed an environmental site assessment of Umiat for the North Slope Borough (NSB). AGRA also performed an EM geophysical survey of the landfill area. The effective survey depth of their instrument was approximately 15 feet bgs. The results of their study "essentially confirmed the landfill boundaries as they had been defined by previous investigations ... the depth of the buried debris was at least 15 feet." AGRA also prepared a qualitative risk assessment addressing potential health risks to people who use the area, potential impacts to wildlife, and estimates of health risks from identified chemicals. The findings of that risk assessment are summarized in Section 4.2.1.

Based on interviews with knowledgeable sources and geophysical methods, they determined the depth of the landfill to be at least 20 feet, and possibly 40 feet deep (AGRA, 1997a).

Of the 31 samples AGRA collected at the Umiat facility, nine were collected at the landfill: two sediment in the landfill area and one downstream, two soil and a duplicate sample north of the landfill, and three surface-water samples (Figure 4-4). Although surface-water sample *1639-05* was reportedly associated with the landfill area, it was not shown on AGRA's sample location figure and is therefore not shown on Figure 4-4. Samples were analyzed for VOCs, PAHs, PCBs, pesticides, arsenic, and lead.

No VOCs or pesticides were detected in the samples. PAHs were detected in six samples (three sediment and three soil). One sediment sample (*1639-07*) collected from the seasonal stream/slough at 1 foot bgs contained 0.3 mg/kg of the PCB Aroclor 1254. Lead was detected in one sediment sample (*1639-02*) at 22 mg/kg. Detected arsenic concentrations ranged from 3 mg/kg to 8 mg/kg.

4.1.5 **1997 E&E Phase III RI**

E&E performed the Phase III RI at the former Umiat AFS to fill data gaps at previously investigated areas and assess areas of potential concern that had not yet been investigated.

The Phase III investigation objectives related to the landfill were to:

- delineate the extent of petroleum and PCB contamination in sediment, subsurface soil, and groundwater within and downgradient of the landfill;
- delineate depth to permafrost under the landfill and adjacent areas. These data were required to determine the feasibility and potential design of a remedial alternative under consideration at the landfill: permafrost encapsulation;
- initiate a treatability study at the landfill to test the viability of permafrost encapsulation. For the Phase III field work, this task was to be accomplished by installing a pilot-scale permafrost cap and thermistors arrays. There is no record of the thermistors having been monitored after their installation. The cap was reportedly disassembled in 2001 or 2002; and
- re-evaluate possible ecological and human health risks associated with PCBs in the seasonal stream and slough. Although PCBs were not detected in the seasonal stream and slough surface water, three sediment samples collected during the 1996 Phase II investigation indicated the presence of PCBs. The subsequent risk assessment (E&E, 1997c) used the sediment data to calculate theoretical fish-tissue concentrations and ecological and human health risks. Although the risk assessment concluded risks were elevated above regulatory limits, they were likely overestimated because of the limited sediment sample size and lack of actual fish-tissue data.

E&E completed the following tasks associated with the landfill:

- drilled 21 soil borings to permafrost at the landfill and had subsurface soil samples analyzed for DRO and pesticides;
- completed six of the 21 soil borings as permanent monitoring wells, with laboratory analyses for groundwater including DRO, PCB, and pesticides;
- constructed an 8-foot-thick 50-foot by 50-foot pilot-scale permafrost cap from native sand and gravel at the landfill;
- installed six thermistor arrays and data loggers in and around the gravel cap from 18 feet to 29 feet below the original grade to collect data on the growth of underlying permafrost over approximately one year;
- sampled and analyzed 49 sediment locations in the slough downgradient of the landfill for PCBs, total organic carbon (TOC), and grain-size distribution; and
- collected and analyzed 14 arctic grayling *(Thymallus arcticus)* from the seasonal stream and slough for PCBs and collected six additional grayling approximately 1 mile upstream for background purposes.

Figure 4-5 shows sample locations from E&E's 1997 Phase III RI.

No pesticides were detected above ARARs or risk-based screening levels in surface soils or sediments.

Subsurface soil samples collected at the landfill contained DRO (8.8 mg/kg to 14 mg/kg in five samples), and pesticides 4,4'-DDD and 4,4'-DDT (0.0059 mg/kg and 0.0065 mg/kg, respectively, in one sample).

PCBs and pesticides were not detected in groundwater samples. DRO in monitoring well MW-4 (0.73 mg/L) was the only detected analyte in groundwater samples collected from the six monitoring wells.

Sediment samples were collected at 49 locations in the seasonal stream and analyzed for PCBs. These included unbiased samples from 11 transects, and biased samples from the deposition areas of the seasonal stream and slough. PCBs were detected in 35 of the 48 samples. Consistent with previous RI phases at Umiat AFS, only Aroclor 1254 was detected. The range of reported values for PCBs in the sediment was 0.058 mg/kg to 1.30 mg/kg. The data indicated the absence of areas of PCB "hot spots," and suggested a historical presence rather than a recent release from an upstream source.

PCBs were also detected in the fish collected from the seasonal stream and slough, but not from those taken from the Colville River. PCB detections ranged from 0.019 mg/kg to 1.4 mg/kg. This and subsequent fish-sampling results were reported on a wet-weight basis. PCBs were not detected in background fish samples.

While PCBs were the main focus of the fish-tissue analysis, 4,4'-DDT and its degradation products (4,4'-DDE and 4,4'-DDD) were also tentatively identified but not quantified in fish tissue. These analytes detected in fish may indicate their presence in the sediments of the seasonal stream and slough. It was concluded that 4,4'-DDT and its degradation products are ubiquitous across the Umiat area because of the historical widespread spraying of 4,4'-DDT, and their levels in fish may reflect exposure to these non-point sources of pesticides near the former Umiat AFS.

Risk-assessment calculations for human health and ecological receptors were updated based on the Phase III sediment and fish tissue results, with results detailed in *Technical Memorandum*, *Human Health and Ecological Risk Assessment, Former Umiat AFS*, dated March 19, 1998. This document is summarized in Section 4.2.3.

Additional sampling was recommended for the seasonal stream and slough and Colville River. Limited sediment sampling was also recommended in these areas to determine the average concentration of pesticides in sediment and whether a link could be made between the sediments and concentrations in fish tissue.

4.1.6 1998 E&E Field Investigation

E&E completed additional field investigations at Umiat in 1998 to fill data gaps at locations previously investigated from 1994 through 1997. E&E performed follow-up tasks at the landfill, the seasonal stream and slough, and the Colville River near Umiat. The objective of the 1998 sampling was to collect sufficient fish-tissue, sediment, surface-water, and groundwater data to better understand and communicate risks associated with human consumption of fish from the Colville River. Figure 4-6 shows sample locations for the 1998 E&E field investigation.

Four existing groundwater wells at the landfill (Figure 4-6) were sampled and analyzed for pesticides, PCBs, and DRO to determine whether previously detected contaminants in the landfill were moving downgradient. The 1998 and previous groundwater results indicated groundwater was not a source of PCBs or 4,4'-DDT and its derivatives to the sediments downstream in the seasonal stream and slough. Petroleum contamination in groundwater was limited to MW-7; no other contaminants found in landfill subsurface soils were detected in groundwater in the northern portion of the landfill.

An additional objective of the 1998 field investigation was to evaluate the presence of pesticides in sediments, surface water, and fish tissue. E&E tested sediments, surface water, and fish for DRO, VOCs, base-neutral-acid extractable compounds (BNA – i.e., SVOCs), PAHs, PCBs, and/or pesticides. 4,4'-DDT was detected in the seasonal stream and slough sediment at 0.0024 mg/kg to 0.0059 mg/kg. 4,4'-DDD (to 0.054 mg/kg), acetone (to 0.13 mg/kg), 2-butanone (0.012 mg/kg), and DRO (to 54 mg/kg) were also detected in sediment samples. Toluene was the only analyte detected in surface water, at 0.001 mg/L.

Whitefish and burbot were collected from the seasonal stream and slough and at upstream and downstream locations in the Colville River and tested for PCBs and pesticides. Both PCBs and pesticides were detected in the fish tissue. Detected PCB levels ranged from 0.00030 mg/kg to 0.87 mg/kg; detected PCBs were primarily Aroclor 1254 and Aroclor 1260, with several detections of Aroclor 1016/1242. Detected pesticides (2,4'-DDD; 2,4'-DDE; 4,4'-DDD; 4,4'-DDT) ranged from 0.00003 mg/kg to 0.740 mg/kg. E&E concluded, "Atmospheric transport and biotransport are likely factors contributing to contaminant concentrations in fish tissue in multiple species in the Colville River. A localized source of contamination is likely present in the Unit C slough. Statistical tests on the data indicate that the source does not appear to be significantly affecting the whitefish population in the remainder of the Colville River... analytical data suggest that the burbot population downriver of the Unit C Seasonal Stream and Slough may have higher concentrations of PCBs and pesticides."

4.1.7 1999 E&E Field Investigation

E&E performed another site investigation at Umiat AFS in August 1999, during which they collected surface-water samples from the seasonal slough and groundwater samples from monitoring wells at the landfill. Figure 4-7 shows sample locations at the landfill for E&E's 1999 field investigation.

No pesticides or PCBs were detected in groundwater samples from the landfill monitoring wells or surface-water samples from the seasonal slough. DRO was detected in two of three groundwater samples at 0.0890 mg/L and 0.107 mg/L and at all three surface-water sample locations at 0.111 mg/L to 0.123 mg/L.

4.1.8 2001 Jacobs Removal Action

In July and August 2001, the USACE and Jacobs Engineering (Jacobs) conducted site inspections of the landfill area and found one small transformer and areas containing debris from lead-acid batteries on the surface of the landfill. At USACE direction, Jacobs removed the visible lead debris and excavated surrounding soil until field instrument measurements indicated lead levels in surrounding soil were below cleanup levels. Approximately 1.3 cy of lead-contaminated soil were removed. The cleanup-verification sample collected from the excavation contained 1,170 mg/kg lead. A sample of the soil immediately beneath the transformer was analyzed and found to contain 52,700 mg/kg of the PCB Aroclor 1254. Jacobs containerized and removed the transformer and about one-third cy of contaminated soil for off-site disposal. A cleanup-verification soil sample contained 2.3 mg/kg Aroclor 1254 (Jacobs, 2001). Figure 4-8 shows the sample locations for Jacobs's 2001 removal action.

On August 10, 2001, the Colville River rose about 10 feet due to a storm event in the surrounding foothills. This flood occurred prior to the installation of a river gage at Umiat, so there is no available hydrologic data for this event. The landfill and surrounding area were covered by up to 3 feet of water. The flood water washed away the stakes marking other potentially lead-contaminated debris, and deposited sand and gravel in excavated areas (USACE, 2011b).

4.2 Risk Assessments

Several studies have been done to evaluate whether contamination from past activities at the former Umiat AFS may affect human health and ecological receptors. These are summarized in the following sections. The years listed in the following subsection titles refer to the year the document was published.

4.2.1 1997 AGRA Qualitative Risk Assessment

AGRA performed a Qualitative Risk Assessment (QRA) of Umiat for the ASNA and NSB to review available data and qualitatively evaluate health risks to humans and wildlife that use and subsist on resources in the Umiat area. The QRA was performed by comparing available analytical results to EPA Region III risk-based concentration (RBCs). If the concentration of a chemical exceeded the RBC, it was identified as a "Chemical of Concern" (COC) and the potential health effects presented. For consistency within this RI report, we use the term COPC to include COCs as described in the 1997 AGRA QRA and other reports referenced herein. COPCs in soil identified at Umiat Area of Concern 7 (the landfill location) were PCB and lead.

The focus of previous investigations was on the Umiat camp and did not include potential ecological impacts from oil exploration and drilling activities. AGRA collected limited data during the 1996 reconnaissance to evaluate ecological risks in these surrounding areas. AGRA's QRA did not consider other implications such as the observed continual release of formerly landfilled material (drums, vehicles, batteries, etc.) into the Colville River.

AGRA noted the landfill area "is an intermittent channel along the inner bank of a large meander of the Colville River. The channel is sparsely vegetated with the thriving vegetation located only
on small clusters of gravel elevated above the predominant grade. The channel deposits consist of well-rounded coarse gravel, indicating a high-energy source of transport... [b]ecause the gravel cover of this landfill is being eroded by pack ice and intermittent flow in the Colville River, chemicals may migrate into the river consistently over time; there is a potential for river sediments adjacent to the landfill area to act as a sink for contaminants. River sediments impacted by site-related compounds could potentially affect aquatic bottom feeders and terrestrial animals that graze or forage in the river near the landfill."

AGRA concluded, "regardless of the remote nature of the site, these conditions warrant consideration for remediation due to the unquantified potential impact to fish and wildlife and the people who subsist on these natural resources. Several sites with identified contamination, or the potential to contaminate both soil and water in the Umiat area, have not been fully evaluated to determine the amount of risk. These areas include the three known landfills near Umiat, the abandoned oil exploration wells, and areas used as burn pits. Additional investigation and evaluation of the health risks from these areas is warranted prior to any additional risk assessments."

4.2.2 1997 E&E Human Health and Ecological Risk Assessment

E&E conducted a baseline human health risk assessment (HHRA) and baseline ecological risk assessment (ERA) for the USACE under the FUDS program at the former Umiat AFS (E&E, 1997). The objective of the baseline HHRA was to evaluate the potential for risk to human health posed by contaminants at Umiat under current conditions and following completion of a proposed limited removal action.

Site-use factors were considered in three human-health-risk scenarios: current Umiat residents, subsistence hunters, and future residents. Conclusions regarding human health risks include:

- "Potential excess lifetime cancer risks and hazard indices (HIs) for current Umiat residents and subsistence hunters associated with consumption of fish caught from the Colville River near Umiat were within acceptable ADEC and EPA regulatory benchmarks.
- Potential excessive lifetime cancer risks and HIs for future residents were greater than ADEC and EPA criteria. Future residents were assumed to eat a higher proportion of fish from the Unit C seasonal stream and slough, and there were no human health risks associated with eating fish from the Colville River for current Umiat residents and subsistence hunters; therefore, human health risks associated with ingesting fish contaminated with Aroclor 1254 are limited to the Unit C seasonal stream and slough and do not extend to the fish collected from the Colville River.

• Although the study was limited to the analysis of PCBs, 4,4'-DDT and its degradation products (4,4'-DDE and 4,4'-DDD) were tentatively identified in the fish tissue. The additional risks due to pesticides in fish tissue remain unknown."

The report concluded, "PCBs in the Unit C sediments may pose unacceptable ecological and human health risks."

E&E used analytical results from the 1994 and 1996 remedial investigations. The conclusions of the baseline HHRA included:

- No complete exposure pathways were identified for groundwater at the former Umiat AFS; therefore, there are no human health risks associated with exposure to groundwater.
- Potential excess lifetime cancer risks and HIs associated with exposure to soil at Unit C were less than ADEC and the EPA Superfund program regulatory benchmarks under current and future land-use conditions.
- Potential excess lifetime cancer risks and HIs associated with consumption of fish caught in the seasonal stream were much greater than ADEC and EPA regulatory benchmarks; however, these risk estimates are based on extremely conservative exposure assumptions and modeling and are expected to grossly exaggerate site risks.

The objective of the baseline ERA was to evaluate the likelihood adverse effects may occur, or are occurring, to ecological receptors due to exposures to chemicals at the site.

There were numerous exceedances of risk-based screening benchmarks for inorganic contaminants of potential ecological concern (COPECs) for indicator communities and species. Every inorganic COPEC detected, except for mercury, exceeded a benchmark for an indicator community or species in at least one unit of the site. In Unit C, no organic COPECs exceeded screening benchmarks for indicator communities.

The conclusion of the ecological risk assessment was, "PCBs in the Unit C seasonal stream and slough do not pose a risk to ecological receptors." Further sampling for the following study reversed this conclusion.

4.2.3 1998 E&E Technical Memorandum: Human Health and Ecological Risk Assessment

The original *Baseline Human Health Risk Assessment* and *Ecological Risk Assessment* (E&E, 1997) concluded human health risks from eating fish potentially containing Aroclor 1254 from the seasonal stream and ecological risks to piscivorous (fish-eating) organisms are unacceptable according to ADEC and EPA criteria; however, the risk estimates were based on modeled concentrations in fish derived from limited sediment data, not on actual fish-tissue analyses. In August 1997, E&E collected additional fish-tissue and sediment samples to better

characterize the risks of Aroclor 1254. E&E's March, 1998 *Technical Memorandum, Human Health and Ecological Risk Assessment* recalculated the hazard quotient using maximum detected concentrations and concluded:

- Potential excess lifetime cancer risks and HIs for current Umiat residents and subsistence hunters associated with consumption of fish caught from the Colville River near Umiat were less than regulatory benchmarks established by ADEC and EPA.
- Potential excess lifetime cancer risks and HIs for future residents were greater than ADEC and EPA criteria. This demonstrates risks associated with ingesting fish contaminated with Aroclor 1254 are limited to the Unit C seasonal stream and risks are not above regulatory guidance values within the Colville River.

4.2.4 2001 ATSDR Health Consultation: Review of Fish Samples

The Agency for Toxic Substances and Disease Registry (ATSDR) released a health consultation that reviewed data from fish sampled near the former Umiat AFS in 1997 and 1998. The health consultation focused on evaluating the potential risk to people who harvest fish at or near the Umiat site. The ATSDR determined human exposures to contaminants in fish at the Umiat site were not occurring at frequencies considered to be a current public-health problem due to the small quantity of fish in the slough and the current lack of harvesting those fish. Therefore, the ATSDR concluded "current Colville River fish contamination data do not indicate the need for public health concerns."

The ATSDR recommended additional sampling to better characterize the nature and extent of downstream contamination in the Colville River.

4.2.5 2003 CHPPM Critical Document Review

The US Army Center for Health Promotion and Preventive Medicine (CHPPM) consolidated information in previous environmental reports on the presence of PCBs in fish tissue and other media of the Colville River Seasonal Slough at the Unit C Landfill. They used the information in conjunction with PCBs-in-fish tissue data from the Alaska region to make a determination of either acceptable or unacceptable health risk for individuals who eat fish from the Colville River.

The CHPPM came to the following conclusions:

• The Umiat AFS Unit C, Area 11 Landfill was a historical source of PCBs to the Unit C Seasonal Slough. Due to years of scouring events, it is doubtful the landfill remains an ongoing source of PCBs to the Seasonal Slough, downstream Colville River sediments, or the Colville River fishery.

- Concentrations of PCBs in the Seasonal Slough fish vary with species. Maximum PCB detections in burbot of the slough exceeded the US Food and Drug Administration (FDA) action limit of 2.0 parts per million (ppm) in only one study. PCB concentrations in two other fish species collected in the slough (Arctic grayling and Broad whitefish) are all well below the FDA action limit and at the lower end of the range of concentrations found in the Colville River and greater Alaska region.
- Despite the occasional exceedances of the FDA action limit for PCBs in burbot of the Seasonal Slough, there are no health risks associated with consuming the slough's fish. The slough supports a very limited fishery, and generally would not allow individuals to consume a sufficient diet of contaminated fish to pose a health concern.

4.2.6 2003 E&E Evaluation of PCBs and DDTs in the Colville River

In response to recommendations in the 2001 ATSDR Health Consultation, in August 2001, E&E studied whether burbot in the Colville River were being adversely affected by contaminants from the slough at the former Umiat AFS. They collected 70 fish samples and up to 35 water samples from the Colville River from about 20 miles upriver of Umiat to near Nuiqsut, about 90 river miles downstream. The samples were analyzed for PCBs and derivatives of the pesticide 4,4'-DDT.

Results indicated:

- The PCBs and DDTs present in the Umiat slough sediment may be affecting nearby downstream locations in the Colville River. Impacts from the Umiat Slough were not noted in the Colville River water at the sample location nearest Nuiqsut.
- Burbot and other fish that migrate into the slough are responsible for higher concentrations in the Colville River fishery upstream and downstream of Umiat.
- Most of the burbot affected by the PCBs and DDTs from the Umiat Slough were found at locations nearest the slough; however, burbot with elevated levels of PCBs and DDTs have migrated from the Umiat Slough approximately 60 miles downstream to the area known as Ocean Point.
- Atmospheric deposition of PCBs and DDTs is also a significant source of total PCBs and DDTs in burbot in the main Colville River.
- The average concentration of PCBs and DDTs in burbot is similar to burbot caught from other areas of the Arctic.
- The highest levels of PCBs and DDTs in tissue are from fish near the Umiat Slough. The Umiat Slough did not affect levels found in burbot caught near Nuiqsut.

4.2.7 2003 ATSDR Health Consultation: Review of Burbot Samples

A Nuiqsut community member requested the ATSDR evaluate E&E's 2001 Colville River fish data and consider specific exposures to the Nuiqsut community. This resulted in the 2003 ATSDR Health Consultation. In response to community concerns contamination might exist in the Colville River, and exposure to contaminants resulting from a subsistence lifestyle could potentially lead to harmful health effects, the ATSDR evaluated four potential exposure scenarios involving eating fish from the Colville River, whole burbot, and burbot livers, including a conservative chronic-exposure scenario of eating a high quantity of fish (up to 390 grams) from the Colville River every day for 70 years.

They concluded, "While PCBs, DDT, and DDT derivatives were detected in fish collected from multiple areas of the Colville River, the levels were very low and exposures to them are not expected to cause harmful health effects. Thus, the ATSDR determined it is safe to eat the fish" (ATSDR, 2003).

4.3 Geophysical Investigations

Various technologies have been used to estimate the extent and depth of buried waste in the Umiat landfill. Years given in the subsection titles indicate the dates of the geophysical investigations.

4.3.1 1994 E&E

As part of their Phase I RI, E&E performed a geophysical survey at Area 11 (the landfill) to screen boring locations for buried debris that could interfere with drilling soil borings. They used a Geonics electromagnetic conductivity instrument (EM-31) to perform the survey. They delineated the horizontal extent of the landfill and estimated the vertical extent of buried metallic debris.

The EM-31 instrument readings (terrain conductivity) were off-scale where measuring within the suspected landfill boundary, indicating a significant volume of buried metallic debris. Readings inside the landfill boundary indicated buried metallic debris as deep as 9 feet bgs. A large volume of metal debris buried potentially as deep as 18 feet bgs was indicated at a few locations in the southern portion of the landfill. E&E's delineation results are shown in Figure 4-10.

4.3.2 2005 USGS Geophysical Report

In 2005, the USGS performed a geophysical survey at several North Slope sites, including the Umiat landfill, using EM induction, total magnetic field, and capacitively coupled resistivity.

The survey identified six cells of buried debris (metallic waste and conductive waste). Figure 4-11 shows the results of the 2005 USGS geophysical investigation.

They estimated the base depths of five of the six cells to be between 40 and 43 feet bgs. Table 4-3 summarizes their findings regarding the areal extent and estimated volume of buried debris and soil within each cell.

4.3.3 2011 GeoTek Geophysical Survey

In April 2011, GeoTek Alaska (GeoTek) performed a geophysical survey of the Umiat Landfill using ground-penetrating radar (GPR), EM, and Global Positioning System (GPS) instrumentation (GeoTek, 2011). The purpose of this survey was to attempt to reconcile the basal depths of debris cells reported by E&E in 1994 (depths to 18 feet bgs) with those reported by the USGS in 2005 (depths to 43 feet bgs). GeoTek planned to acquire data along a grid pattern; however, dense vegetation covered portions of the site, which limited data acquisition to open areas and natural paths through that vegetation. GeoTek confirmed five of the six cell locations previously identified by USGS and interpreted the basal depths of these cells to be between "nine and 18 feet below the surface." Within the area of geophysical data acquisition, GeoTek identified data anomalies and determined the vertical and lateral extent of the landfill pits or former ground surface prior to burial of debris. They concluded, "There is good correlation of the EM data with the magnetic data anomaly extents as mapped by the USGS" (Figure 4-12).

GeoTek also observed numerous high-value data anomalies (spikes) outside previously indentified debris cells. These data anomalies were interpreted to be associated with surface or shallow-buried scraps of metal. Due to snow cover, these anomalies could not be confirmed as surface metal.

Based on an interpretation of their GPR data, they estimated the basal depths of the debris cells to range from 8 feet to 17 feet bgs. Their area and volume estimates are summarized in Table 4-3.

4.4 2011 USACE Hydrologic Analysis of Umiat Landfill

The landfill is subject to overland flow during flood events. The water velocity during these events can get high enough to erode the sand and gravel covering the landfill. There is a concern a flood event will uncover hazardous material and transport contamination downstream, particularly into areas used for subsistence fishing by the residents of Nuiqsut (USACE, 2011a).

The USACE performed a hydrologic analysis and identified potential interim measures to prevent erosion of landfill-cover materials until a long-term/permanent solution is considered.

The discussion in this report is limited to hydrologic analysis; interim corrective measures will be discussed in the FS.

An analysis was performed to determine the return interval for the maximum peak flow for the 2004 flood event and the flows that would be associated with a range of return intervals. The return period for a maximum peak flow of 261,000 cfs, which corresponds to the maximum peak in 2004, is a 35-year event.

Data from the 2004 flood event was used to estimate the extent of flooding and water velocity over the landfill. Modeling results indicated the landfill area would be inundated during a flood event when flows are between 109,700 cfs and 132,600 cfs. According to USGS records, this has occurred every year since 2003, except in 2008. According to the model, during the flood peak, velocity over the landfill is between 4 feet to 6 feet per second (fps), high enough to mobilize sands and gravels covering the landfill.

Table 4-1 Documents Reviewed for This RI

Year of Study	Report Date	Author	Document Title				
1986	July 1987	USACE	Results of Hazardous Waste Sampling and Analysis for Umiat Air Force Station				
1994	January 1995	E&E	(DRAFT) Umiat Remedial Investigation Project Report, Umiat Air Force Station, Umiat, Alaska				
1996	January 1997	AGRA	Environmental Site Assessment Final Report, Umiat, Alaska				
1996	June 1997	E&E	Final Remedial Investigation Report, Volume 1 Report, Former Umiat Air Force Station, Umiat, Alaska				
1996	June 1997	E&E	Remedial Investigation Report, Volume 2 Appendix F Analytical Data, Former Umiat Air Force Station, Umiat, Alaska				
(1994 and 1996			Final Risk Assessment Report, Baseline Human Health Risk Assessment,				
samples)	June 1997	E&E	Baseline Ecological Risk Assessment, Former Umiat Air Force Station, Umiat, Alaska				
1997	March 1998	E&E	Technical Memorandum, Human Health and Ecological Risk Assessment, Former Umiat Air Force Station, Umiat, Alaska				
1997	July 1998	E&E	1997 Remedial Investigation Report, Umiat, Alaska, Volume 1, Report				
1998	October 1999	E&E	Final 1998 Field Investigation Report, Former Umiat Air Force Station, Alaska				
1999	January 2000	E&E	1999 Field Investigation Technical Memorandum, Former Umiat Air Force Station, Umiat, Alaska				
(1997 and 1998 samples)	June 2001	ATSDR	Health Consultation, Review of Fish Samples, US Army USACE Umiat Air Force Station				
2001	October 2001	Jacobs	Technical Memorandum, Hazardous Waste Removal from Unit C Landfill				
(1991 to 2002			Critical Document Review No. 39-DA-00QZ-03, Human Health Effects Associated with PCBs at the Colville River				
samples)	February 2003	CHPPM	Seasonal Slough, Former Umiat Air Force Station, Umiat, Alaska				
2001	March 2003	E&E	Evaluation of PCBs and DDTs in the Colville River, Former Umiat Air Force Station, Umiat, Alaska				
(2001 samples)	November 2003	ATSDR	Health Consultation, Review of Burbot Samples, US Army USACE Umiat Air Force Station				
2005	2006	USGS	Geophysical Investigations of Selected Infrastructure Sites within the National Petroleum Reserve, Alaska. Administrative Report 2006-LAI-05-0015				
2011	April 2011	USACE	Hydrologic Analysis of Umiat Landfill, FUDS Project F10AK0243-08				
2011	November 2011	GeoTek	Final Technical Memorandum, Umiat Landfill Geophysical Survey, FUDS Project F10AK024308, Umiat, Alaska				

Event	Sample Location	Matrix	Laboratory Analyses	
1986 USACE	Seasonal Stream/Slough	Surface Water	VOC, SVOC, PCB, Metals	
		Sediment	VOC, SVOC, PCB, Metals	
1994 E&E	Landfill	Soil	GRO, DRO, TRPH, Fuel ID, VOC, PCB, Pesticides, Metals	
	Background	Soil	Metals	
1996 AGRA	Landfill	Soil	VOC, PAH, Metals	
	Seasonal Stream/Slough	Sediment	PAH, PCB, Pesticides, Metals	
		Surface Water	VOC, PAH, PCB, Pesticides, Metals	
1996 E&E	Landfill	Soil	GRO, DRO, RRO, BTEX, VOC, BNA, PCB, Pesticides, Metals	
		Groundwater	GRO, DRO, TRPH, VOC, PAH, PCB, Pesticides	
	Seasonal Stream/Slough	Sediment	RRO, VOC, BNA, PCB, Pesticides, Metals	
		Surface Water	VOC, PAH, PCB, Pesticides, Metals	
1997 E&E	Landfill	Soil	DRO, PCB, Pesticides	
		Groundwater	DRO, PCB, Pesticides	
	Seasonal Stream/Slough	Sediment	PCB	
	Seasonal Stream and Colville River	Fish Tissue	PCB	
1998 E&E	Landfill	Groundwater	DRO, PCB, Pesticides	
	Seasonal Stream/Slough	Sediment	DRO, VOC, BNA, PCB, Pesticides	
		Surface Water	DRO, VOC, PAH, PCB, Pesticides	
	Seasonal Stream and Colville River	Fish Tissue	PCB, Pesticides	
1999 E&E	Landfill	Groundwater	DRO, PCB, Pesticides	
	Seasonal Stream/Slough	Surface Water	DRO, PCB, Pesticides	

 Table 4-2

 Summary of Analytical Sampling Associated with Landfill

Notes: This table summarizes only the analytical sampling associated with the landfill and background locations. Refer to Tables D-1 through D-3 for list of sample numbers, sample locations, more specific analytes, and laboratory analytical methods.

Abbreviations:

- BNA Base-neutral-acid extractible compounds
- BTEX Benzene, toluene, ethylbenzene, and xylenes
- DRO Diesel range organics
- Fuel ID Fuel identification
- GRO Gasoline range organics
- PAH Polynuclear aromatic hydrocarbons
- PCB Polychlorinated biphenyls
- RRO Residual range organics
- SVOC Semivolatile organic compounds
- TRPH Total recoverable petroleum compounds
- VOC Volatile organic compounds

	2005 USGS			2011 GeoTek	
Name of	Area	Base depth	Volume	Base depth	Volume
Anomaly	(ft ²)	(ft)	(cy)	(ft)	(cy)
Cell 1	12,142	unclear	NA	NA	NA
Cell 2	28,191	40	41,098	14	14,619
Cell 3	34,897	43	55,110	12	15,511
Cell 4	7,287	40	10,626	13	3,509
Cell 5	56,510	43	4,252	8	16,745
Cell 6	99,136	43	156,590	17	62,425
TOTAL	238,163	NA	267,676	NA	112,809

 Table 4-3

 Summary of Geophysical Investigation Results

Notes: USGS results were converted from SI to English units.

NA Not applicable

GeoTek verified the areas estimated by USGS and used them in their calculations



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SHANNON & WILSON, INC.

FIG. 4-9

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5.0 METHODOLOGY FOR IDENTIFYING COPCS AND ESTIMATING CUMULATIVE RISK

Historic analytical results were evaluated and COPCs identified using two basic approaches. Soil, sediment, surface-water, and groundwater results were compared to potential cleanup levels (PCLs) from Alaska statutes (Table 5-1). Additionally, we compared the highest results for soil and sediment to one-tenth the Method Two Table B1 soil cleanup levels for the Arctic Zone, and surface-water and groundwater results to one-tenth the Table C groundwater cleanup levels, in accordance with the ADEC's 2008 *Cumulative Risk Guidance*. Fish-sample results were compared to calculated site-specific risk-based fish-screening levels (see Section 5.3).

Results are also presented in comparison to "to-be-considered" (TBC) criteria, namely the National Oceanic and Atmospheric Administration (NOAA) Screening and Quick Reference Table (SQuiRT) values. While TBCs don't hold the weight of regulation, they may be relevant for consideration by stakeholders or other interested parties reviewing the accumulated chemical data. The PCLs and risk-based screening levels used to identify COPCs are listed in Table 5-1, with the highest detected analyte concentrations for each media. Table F-1 (in Appendix F) lists PCL and TBC concentrations.

5.1 Soil and Sediment

Soil and sediment were considered in the same manner for purposes of comparing to PCLs and incorporating the results into the cumulative risk evaluation. Given that the landfill is within a hyporheic zone (the interface between groundwater and surface water) and is periodically flooded during spring snowmelt events, soil may be considered sediment and sediment considered soil depending on the time of year. For purposes of assessing the potential for exposure to contaminants, sediment is conservatively compared to soil PCLs and risk-based screening levels.

The primary soil/sediment PCLs are derived from 18 AAC 75, specifically Method Two cleanup levels for the Arctic Zone and migration to groundwater. Method Two cleanup levels are risk-based cleanup levels based on a cancer risk-management standard of 1 in 100,000 (1 x 10⁻⁵) and a noncarcinogenic risk standard or HI of 1.0, set forth in 18 AAC 75.325(h). ADEC Method Two cleanup levels for the Arctic Zone are based on exposure frequency values of 200 days (160 days non-exposure time per year). The remaining exposure parameters used to develop Method Two cleanup levels are standardized default values developed by the EPA (ADEC, 2002). The exposure scenarios are essentially residential scenarios for children or adults involving exposure duration of six and 30 years, respectively.

Organic and inorganic analyte results were compared to the more stringent of the Method Two direct-contact and outdoor-air inhalation pathway Arctic-Zone cleanup levels and migration-to-groundwater cleanup levels. Method Two soil-cleanup levels are considered to be protective of human health with respect to the carcinogenic risk standard and non-carcinogenic HI for individual analytes in a residential setting under long-term exposure. Migration-to-groundwater soil-cleanup levels are considered protective of groundwater as a drinking-water source. Analytical results were also screened for potential contributions to cumulative risk by comparing the highest result to one-tenth the relevant human-health based cleanup level, or in the case of fish-tissue results, the calculated risk-based screening level (see Section 5.4).

Groundwater is present in the landfill area. The ADEC considers sites north of Latitude 68° North to be in the Arctic Zone, where groundwater is not typically considered an exposure medium of concern. It is assumed groundwater and surface water at Umiat are closely connected; during the summer, it is likely the majority of the groundwater in the landfill originates from surface water from the river, to re-emerge into the seasonal slough. Because of the close hydrologic connection between surface and groundwater at this site, the groundwater is protected for use as drinking water, and migration-to-groundwater soil cleanup levels apply.

For the same reason (interrelatedness of groundwater and surface water), suprapermafrost groundwater is considered a transport medium for contaminant migration from soil in the landfill to the adjacent slough.

The use of the Method Two cleanup levels is considered a conservative and protective screening tool to assess the need for actions at the site. Method Two soil-cleanup levels were used when appropriate for petroleum hydrocarbons (GRO, DRO, and RRO). The approval of Method Two cleanup levels in the Arctic Zone for petroleum hydrocarbons requires the responsible party to demonstrate levels will be protective of migration-to-surface water (18 AAC 75.340 [4][b]).

The NOAA SQuiRTs include medium-specific screening values for soil and sediment. Soil results were also compared to the NOAA SQuiRT values for soil, and sediment results compared to the NOAA SQuiRT values for freshwater sediment, using the most stringent screening criteria available for a given analyte. The SQuiRTs were developed for internal use by the Coastal Protection and Restoration Division of NOAA. The Division identifies potential impacts to coastal resources and habitats likely to be affected by hazardous waste sites. The SQuiRT values are TBCs intended for preliminary screening purposes only; they do not represent official NOAA policy and do not constitute cleanup levels.

The NOAA SQuiRTs' preface notes:

This set of NOAA Screening Quick Reference Tables, or SQuiRTs, presents screening concentrations for inorganic and organic contaminants in various environmental media....NOAA identifies potential impacts to coastal resources and habitats likely to be affected by hazardous waste. To screen for substances which may threaten natural resources of concern to NOAA, environmental concentrations are compared to these screening levels. These tables are intended for preliminary screening purposes only. NOAA does not endorse their use for any other purposes.

SQuiRT data are not ARARs, as they have not been promulgated as laws or requirements. They were, however, included in the screening effort as TBC criteria that may be relevant for consideration by stakeholders or other interested parties reviewing accumulated chemical data.

5.2 Surface Water and Groundwater

As noted in Section 5.1, surface water and groundwater are closely connected hydrologically at the site. The landfill is, at certain times of the year, within the hyporheic zone of the seasonal stream. 18 AAC 75.345(f) requires, "groundwater that is closely connected hydrologically to nearby surface water may not cause a violation of the water quality standards in 18 AAC 70 for surface water or sediment." Likewise, surface water may not exceed Table C Groundwater cleanup levels, as surface water in Alaska is protected for all uses (including drinking water). Therefore, 18 AAC 75.345 Table C groundwater and 18 AAC 70 Water Quality Standards apply to both surface water and groundwater.

To screen water-sample data and identify COPCs, surface-water and groundwater-sample results were compared to the most stringent values (where available) of:

- 18 AAC 75.345 Table C groundwater cleanup levels;
- 18 AAC 70 Water Quality Standards (May 2011) for fresh-water uses; and
- Alaska Water Quality Criteria Manual for Toxic and Other Deleterious Organic and Inorganic Substances (December 2008), Water Quality Criteria for Toxics and Other Deleterious Substances (Aquatic Life Criteria for Fresh Water), which also includes criteria for pesticides and inorganic analytes.

The water-quality standards regulate human activities that result in alterations to waters within the state's jurisdiction. The water data were compared with standards provided for "Petroleum Hydrocarbons, Oils and Grease, for Fresh Water Uses." The water-quality standards further state surface waters and adjoining shorelines must be virtually free from floating oil, film, sheen, or discolorations.

The NOAA SQuiRTs include media-specific screening values for surface water and groundwater. Surface-water results were also compared to the NOAA SQuiRT values for freshwater, and groundwater results compared to the NOAA SQuiRT values for groundwater, using the most stringent screening criteria available for a given analyte. As noted in Section 5.1, SQuiRT values are not regulatory limits but were included in the screening effort as TBC criteria that may be relevant for consideration by stakeholders or other interested parties reviewing the accumulated chemical data.

5.3 Background Evaluation

Arsenic was detected in 21 soil samples at concentrations exceeding the ADEC migration-togroundwater soil-cleanup level of 3.9 mg/kg. Aluminum was detected in one unfiltered water sample at 0.136 mg/L, above the ADEC water-quality standard of 0.087 mg/L. In both cases, the concentrations observed were fairly consistent across the data set and within the range of background-sample concentrations from the 1996 E&E RI.

In order to statistically compare site concentrations to background concentrations, we conducted a Wilcoxon-Mann-Whitney rank-sum site vs. background comparison using ProUCL 4.1, a statistical software package produced by the EPA. Tabulated data used for this comparison, as well as statistical output, is provided in Appendix G. While the background data sets were small, the conclusion (at a 95-percent confidence level) in each case was that the site concentrations were not significantly different than background concentrations. This finding for arsenic is consistent with our experience at numerous arctic sites where arsenic is present at uniformly high levels throughout the soil. Also, the aluminum result exceeding the WQS was from an unfiltered water sample; the corresponding filtered sample was well below the WQS, suggesting the high aluminum concentrations were due to disturbed natural sediment, not dissolved aluminum in the water column.

5.4 Fish Tissue

Fish tissue results were screened against risk-based screening levels calculated with the EPA "Regional Screening Levels for Chemical Contaminants at Superfund Sites" online calculator (see reference in Section 7.0), using a cancer-risk management level of 1 in 1,000,000 (1x10⁻⁶), a hazard index of 0.1, and fish-consumption rates estimated for subsistence users (390 g/day; 2003 ATSDR citing ADFG 2000 Community Profile Database for Nuiqsut). Analytes exceeding risk-based screening levels were included in the cumulative risk evaluation and considered COPCs.

5.5 Cumulative-Risk Evaluation

Cumulative risk is defined as the sum of risks resulting from multiple sources and pathways to which humans are exposed. When applying Method Two cleanup levels to a site, 18 AAC 75.325(g) states risk from hazardous substances must not exceed a cumulative carcinogenic risk standard of 1 in 100,000, and a cumulative noncarcinogenic risk standard at a HI of 1.0 across all exposure pathways. Cumulative risk evaluation (CRE) is a means of determining whether the risk to human health from multiple contaminants at a given site exceed these risk standards, and is typically conducted following site cleanup. Given that multiple analytes were present at greater than one-tenth the Method Two cleanup levels, we conducted a CRE to assess baseline (pre-cleanup) cumulative risk at the site. The CRE will be used to help develop preliminary remediation goals that are protective of exposure to multiple contaminants as part of the FS.

Some chemicals may pose exposure risks through more than one pathway (e.g., PCBs in soil via direct contact and inhalation). When more than one exposure pathway was possible for a given analyte found at the site, each pathway was included in the CRE to evaluate the incremental risk associated with that contaminant and its exposure routes.

In accordance with the ADEC's 2008 *Cumulative Risk Guidance*, we compared the highest analytical results for soil/sediment to one-tenth the Method Two cleanup levels for the Arctic Zone, and maximum analytical results for water (surface water and groundwater) to one-tenth the Table C groundwater cleanup levels. As noted above, fish-sample results were compared to site-specific fish risk-based screening levels to determine which analytes to include in the CRE. Petroleum hydrocarbons (i.e. GRO, DRO, and RRO) and lead were not included in the CRE, in accordance with ADEC regulations and the *Cumulative Risk Guidance*.

Once analytes were selected for inclusion in the CRE, pathway-specific carcinogenic and noncarcinogenic risk was calculated for each analyte using the procedures specified in the ADEC's 2008 *Cumulative Risk Guidance*. Carcinogenic risk is calculated by dividing the highest site concentration by the RBC, then multiplying by the risk-management standard of 1×10^{-5} . Noncarcinogenic risk is calculated by dividing the highest site concentration by the appropriate RBC and multiplying by the hazard index of 1.0. The CRE is included as Table 5-7.

Soil RBCs in the *Cumulative Risk Guidance* were used for calculating risk from soil and sediment, and groundwater RBCs (also listed in the *Guidance*) for calculating risk from surface water and groundwater. Fish-tissue RBCs were calculated using the EPA calculator referenced in Section 5.3 using a cancer risk-management level of 1×10^{-5} , a hazard index of 1, and fish-consumption rates estimated for subsistence users (390 g/day). Certain analytes present risk

through a limited number of exposure pathways (for example, inhalation of arsenic is not considered a potential exposure pathway); the CRE includes only those pathways for which an RBC is listed or calculable for a given analyte.

A list of COPCs, including the highest result and frequency of exceedance, are provided in Table 5-8. Arsenic and aluminum are not considered COPCs and were not included in the CRE as there were no statistically significant differences between project- and background-sample results.

In the draft RI, PRGs based solely on chemical-specific PCLs were presented, not accounting for cumulative risk from multiple contaminants. PRGs are typically presented during the FS phase of the RI/FS process. PRGs will be developed as part of the FS that will account for cumulative risk for contaminants for which cumulative risk is addressed. PRGs for petroleum hydrocarbons and lead will still be based solely on chemical-specific ARARs.

Applying cleanup levels and calculating cumulative risk based on residential exposure scenarios overestimates current, and potentially future, risks. There are no people residing at the site for 200 days in a year. The CRE calculations are based on readily available RBCs that assume residential exposure scenarios, and therefore overestimate the risk for the site. PRGs may be developed that take into account cumulative risk for site-specific exposure scenarios. The final CRE following site remediation or mitigations should be based on site-specific exposure scenarios to accurately re-evaluate cumulative risk for the Umiat landfill.

Table 5-1

Chemical-Specific PCLs and TBCs Used to Evaluate Analytical Results and Identify Contaminants of Potential Concern

Medium	Chemical-Specific PCL	Chemical-Specific TBC
Soil	Petroleum Hydrocarbons • 18 AAC 75.341, Table B2, Over-40-inch Migration to Groundwater petroleum hydrocarbon soil-cleanup levels Other Most stringent of: • 18 AAC 75.341, Table B1, Arctic Zone Direct Contact soil-cleanup levels • 18 AAC 75.341, Table B1, Arctic Zone Outdoor Inhalation soil-cleanup levels • 18 AAC 75.341, Table B1, Arctic Zone Outdoor Inhalation soil-cleanup levels • 18 AAC 75.341, Table B1, Migration to Groundwater soil-cleanup levels	 Most stringent NOAA SQuiRT value for soil.¹
Sediment	Petroleum Hydrocarbons • 18 AAC 75.341, Table B2, Over-40-inch Migration to Groundwater petroleum hydrocarbon soil-cleanup levels Other Most stringent of: • 18 AAC 75.341, Table B1, Arctic Zone Direct Contact soil-cleanup levels • 18 AAC 75.341, Table B1, Arctic Zone Outdoor Inhalation soil-cleanup levels • 18 AAC 75.341, Table B1, Arctic Zone Outdoor Inhalation soil-cleanup levels • 18 AAC 75.341, Table B1, Migration to Groundwater soil-cleanup levels	Most stringent NOAA SQuiRT value for freshwater sediment.
Groundwater	More stringent of: • 18 AAC 75.345, Table C groundwater-cleanup levels • 18 AAC 70 Water Quality Standards including: Alaska Water Quality Criteria Manual for Toxic and Other Deleterious Organic and Inorganic Substances; most stringent criteria for fresh water	 Most stringent NOAA SQuiRT value for groundwater.
Surface Water	More stringent of: • 18 AAC 75.345, Table C groundwater-cleanup levels • 18 AAC 70 Water Quality Standards including: Alaska Water Quality Criteria Manual for Toxic and Other Deleterious Organic and Inorganic Substances; most stringent criteria for fresh water	• Most stringent NOAA SQuiRT value for fresh surface water. ²
Fish Tissue		• EPA Fish Tissue Risk-Based Screening Levels, modified for site-specific consumption rates. ³ See Table F-1C for a full list of assumptions.

Notes:

- ¹ Soil SQuiRTs include values for: Invertebrates, Mammals, Plants, and Other
- ² Surface water SQuiRTs include: Acute and Chronic levels
- ³ Fish consumption rate is 390 g/day, carcinogenic target risk is 10⁻⁶, hazard index is 1

Abbreviations:

- AAC Alaska Administrative CodeADEC Alaska Department of Environmental ConservationNOAA National Oceanic and Atmospheric AdministrationPCL Potential cleanup level
- SQuiRT Screening Quick Reference Table (NOAA 2008)
 - TBC To Be Considered criteria

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Analytical			PCL				1994	E&E	1996	AGRA	1996	6 E&E	1997	E&E	2001 J	acobs
Method	Analyte	PCL	Source	TBC	RBSL	Units	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]
AK 101	Gasoline range organics	260	OFMTG	—	—	mg/kg	—		_		19	[6.2]	—	—	_	_
	Toluene	6.5	MTG	0.01	22	mg/kg	—		_	-	0.5	[0.15]	—	—	_	_
	Xylenes (total)	63	MTG	0.1	6.3	mg/kg	—	_	_		0.22	[0.31]	—	—		_
AK 102	Diesel range organics	230	OFMTG	—	_	mg/kg	—	_	_	-	1300	[4.6]	14	[4.6]	_	_
AK M 8100	Diesel range organics	230	OFMTG	—	_	mg/kg	44	[13]	_		-	—	—	—		_
AK 103	Residual range organics	8,300	OFIG	—	_	mg/kg	—		_	-	4100	[120]	—	—	_	_
SW8260	Acetone	88	MTG	2.5	10,200	mg/kg	—	[0.05]	_	[2]	0.0199	[0.0519]		—	_	
	Methylene chloride	0.016	MTG	0.4	24	mg/kg	0.019	[0.01]	_	[0.1]	0.0135	[0.00555]	—	—	_	_
	Toluene	6.5	MTG	0.01	22	mg/kg	0.008	[0.0062]	_	[0.1]	0.0045	[0.026]	—	—	_	_
	Xylenes (total)	63	MTG	0.1	6.3	mg/kg	0.005	[0.0062]			0.00859	[0.00619]	_	—	_	—
	m,p-Xylene	63	MTG	0.1	6.2	mg/kg	—		_	[0.1]	0.00572	[0.00619]	—	—	_	_
	o-Xylene	63	MTG	0.1	0.5	mg/kg	—	_	Ι	[0.1]	0.00288	[0.00619]	—	—	-	—
PAH SIM	2-Methylnaphthalene	6.1	MTG	3.24	38	mg/kg	—	_	0.024	[0.005]	-		—	—	_	—
	Benzo(b)fluoranthene	6.6	AZDC	59.8	0.66	mg/kg	—		0.01	[0.005]	—	—	—	—	—	—
	Benzo(g,h,i)perylene	1,900	AZDC	119	190	mg/kg	—		0.007	[0.005]		—	_	—	_	—
	Chrysene	360	MTG	4.73	66	mg/kg	—		0.017	[0.005]	_	—	—	—	_	_
	Dibenzofuran	11	MTG		27	mg/kg	—	_	0.007	[0.005]	_	—	—	_		_
	Naphthalene	20	MTG	0.0994	4.2	mg/kg	—		0.014	[0.005]	_	—	—	—	_	—
	Phenanthrene	3,000	MTG	45.7	2,780	mg/kg	—		0.039	[0.005]	—		—	—	—	_
	Pyrene	1,000	MTG	78.5	190	mg/kg	—	—	0.005	[0.005]	_	—	—	_		_
SW8270	2-Methylnaphthalene	6.1	MTG	3.24	38	mg/kg	—	—	—	—	0.0753	[3.43]	—	—		—
	Benzoic acid	410	MTG	—	42,800	mg/kg	—		_	—	0.0585	[17.1]	—	—	—	_
	bis(2-Ethylhexyl)phthalate	13	MTG	0.1	30	mg/kg	—	_	—	_	0.118	[3.43]	—	—	—	_
	Di-n-octyl phthalate	3,800	MTG	0.1	420	mg/kg	—	—	—	—	0.159	[3.43]	—	—		—
	Phenanthrene	3,000	MTG	45.7	2,780	mg/kg	—	_	—	_	0.0691	[3.43]	—	—	—	_
	Pyrene	1,000	MTG	78.5	190	mg/kg	—		_	—	0.616	[0.409]	—	—	_	_
SW8080	4,4'-DDD	7.2	MTG	0.01	4.1	mg/kg	0.026	[0.1]	—	—	31.4	[0.00231]	0.0059	[0.0037]		—
Series	4,4'-DDE	5.1	MTG	0.01	2.9	mg/kg	—	[0.1]	—	—	0.00062	[4.15]	—	—	—	_
	4,4'-DDT	7.3	MTG	0.01	2.9	mg/kg	0.05	[0.01]	—	—	38.2	[0.00579]	0.0065	[0.0037]	—	—
	Aroclor 1254	1	AZDC	0.00033	0.1	mg/kg	—	[0.105]	—	—	0.224	[41.5]	—	—	2.3	[0.11]

 Table 5-2

 Highest Detected Analyte and PQL Concentrations in Soil Samples

Analytical			PCL				1994	E&E	1996	AGRA	1996	6 E&E	1997	E&E	2001 、	lacobs
Method	Analyte	PCL	Source	TBC	RBSL	Units	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]
SW6000/	Aluminum	_	_	50	_	mg/kg	_	_	_	_	9,280	_	_	—	_	_
7000 Series	Antimony	3.6	MTG	0.142	5.5	mg/kg	—		_		0.95	[7.1]		_		
	Arsenic	3.9	MTG	5.7	0.61	mg/kg	7	_	8	[1]	8.4	_		_		_
	Barium	1100	MTG	1.04	2,740	mg/kg	430	_	—	—	552	_		—	-	_
	Beryllium	42	MTG	1.06	27	mg/kg	—	_	—	—	0.37	_		—	-	_
	Calcium	-	-		_	mg/kg	_		_		4,290			Ι		
	Chromium	25	MTG		41	mg/kg	23		_		19.2	_		-		_
	Cobalt	-	-	0.14	_	mg/kg	_		_		13.8			Ι		
	Copper	460	MTG	5.4	550	mg/kg	_	_	_		31.4					
	Iron	_	—	200	_	mg/kg	—	—	—	—	27,800			—	—	
	Lead	400	AZDC	0.0537	_	mg/kg	10	_	_	[20]	598				1170	[18.7]
	Magnesium	_	—	_	—	mg/kg	—	—	—	—	5170			—	—	
	Manganese	_	_	100	—	mg/kg	—		_		805	_		-		_
	Mercury	1.4	MTG	0.1	2.6	mg/kg	—	[0.2]	_		0.06	[0.02]				
	Nickel	86	MTG	13.6	270	mg/kg	—	—	—	—	38.5			—	—	—
	Potassium	_	_		—	mg/kg	_		_		912	_		-		_
	Selenium	3.4	MTG	0.52	68	mg/kg	3	[1]	—		0.45	[0.5]		Ι		
	Sodium	_	_		_	mg/kg	_		_		61.4	[85.5]		-		_
	Vanadium	960	AZDC	1.59	96	mg/kg	_	-	_	_	30.7	_		-	_	_
	Zinc	4100	MTG	6.62	4,110	mg/kg	—	_	_	—	121			_		—

 Table 5-2

 Highest Detected Analyte and PQL Concentrations in Soil Samples

mg/kg milligrams per kilogram

PCL Potential cleanup level

TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards

RBSL Risk-based screening level (Hazard Quotient = 0.1 or Cancer Risk = 10⁻⁶) - more stringent of Direct Contact or Inhalation Pathways for the Arctic Zone

PQL practical quantitation limit (also known as reporting limit)

bold result or PQL exceeds the ARAR

shaded result exceeds the RBSL, and analyte is included in the CRE (Table 6-2)

not applicable, analysis not performed, or ARAR/TBC/RBSL does not exist

AZDC 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Direct Contact

MTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater

OFIG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Ingestion

OFMTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Migration to Groundwater

 Table 5-3

 Highest Detected Analyte and PQL Concentrations in Sediment Samples

Analytical			PCL				1986 l	JSACE	1996	AGRA	1996	E&E	1997	E&E	199	8 E&E
Method	Analyte	PCL	Source	TBC	RBSL	Units	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]
AK 102	Diesel range organics	230	OFMTG	_		mg/kg	10	_	—	—		_	—	_	54	[3.1]
AK 103	Residual range organics	8300	OFIG	_		mg/kg	_			_	48	[50]	—	_	_	_
SW8260	2-Butanone	59	MTG	89.6	2,330	mg/kg			_		0.0118	[0.0125]	_	_	0.012	[0.0055]
	Acetone	88	MTG	2.5	10,200	mg/kg					0.0443				0.13	[0.0052]
	Methylene chloride	0.016	MTG	0.4	24	mg/kg					0.00267	0.00629	_			[0.00093]
	2-Methylnaphthalene	6.1	MTG	3.24	38	mg/kg		[0.04]	_		0.0523	[0.41]	_	_		[0.33]
	bis(2-Ethylhexyl)phthalate	13	MTG	0.1	30	mg/kg		[0.04]			0.135	[0.385]				[0.43]
PAH SIM	2-Methylnaphthalene	6.1	MTG	3.24	38	mg/kg			0.075	[0.005]			_			
	Benzo(b)fluoranthene	6.6	AZDC	59.8	0.66	mg/kg	—	—	0.011	[0.005]		—	—	—	—	—
	Benzo(g,h,i)perylene	1900	AZDC	119	190	mg/kg			0.008	[0.005]						
	Chrysene	360	MTG	4.73	66	mg/kg			0.019	[0.005]			_			
	Dibenzofuran	11	MTG	_	27	mg/kg	—	—	0.021	[0.005]		—	—	—	—	—
	Fluoranthene	1400	MTG	122	250	mg/kg			0.009	[0.005]			_			
	Naphthalene	20	MTG	0.0994	4.2	mg/kg			0.042	[0.005]			_			
	Phenanthrene	3000	MTG	45.7	2,780	mg/kg	—	—	0.075	[0.005]		—	—	—	—	—
	Pyrene	1000	MTG	78.5	190	mg/kg			0.008	[0.005]						
SW8080	4,4'-DDD	7.2	MTG	0.01	4.1	mg/kg	0.65			[0.01]	0.00838	[0.124]			0.054	[0.0021]
Series	4,4'-DDT	7.3	MTG	0.01	2.9	mg/kg	—	[0.043]	—	[0.01]	0.0325	[0.311]	—	—	0.059	[0.0025]
	Aroclor 1254	1	AZDC	0.00033	0.1	mg/kg	0.68	_	0.3	[0.1]	17.8	_	1.3	[0.059]	_	[0.0098]

 Table 5-3

 Highest Detected Analyte and PQL Concentrations in Sediment Samples

Analytical			PCL				1986 L	JSACE	1996	AGRA	1996	E&E	1997	E&E	199	8 E&E
Method	Analyte	PCL	Source	TBC	RBSL	Units	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]
SW6000/	Aluminum			50		mg/kg					6250		_			
7000	Arsenic	3.9	MTG	5.7	0.61	mg/kg			7	[1]	5		_	_		
Series	Barium	1100	MTG	1.04	2,740	mg/kg					309		—	—	_	
	Beryllium	42	MTG	1.06	27	mg/kg	_	_		_	0.22	-	—	—	—	_
	Calcium		_	_		mg/kg					2030		—	—		_
	Chromium	25	MTG	_	41	mg/kg					12.1		_	_	_	
	Cobalt	_	_	0.14		mg/kg					8.7		_			
	Copper	460	MTG	5.4	550	mg/kg					19.4		—	—		_
	Iron		_	200		mg/kg					18,800		_	_	_	
	Lead	400	AZDC	0.0537		mg/kg			22	[20]	9.7		—	—	_	
	Magnesium	—	—	—	—	mg/kg	—	—		—	3270	—	—	—	—	—
	Manganese		_	100		mg/kg					608		_	_	_	
	Mercury	1.4	MTG	0.1	2.6	mg/kg					0.05	[0.02]	_			
	Nickel	86	MTG	13.6	270	mg/kg	—	—		—	25	—	—	_	—	—
	Potassium		_	_		mg/kg					695		_	_	_	
	Sodium		_			mg/kg					64.3	[95.4]	—	—	_	
	Vanadium	960	AZDC	1.59	96	mg/kg	_				19.5	_				
	Zinc	4100	MTG	6.62	4,110	mg/kg		_	—	_	164	—	—	_		_

mg/kg milligrams per kilogram

PCL Potential cleanup level

TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards

RBSL Risk-based screening level (Hazard Quotient = 0.1 or Cancer Risk = 10⁻⁶) - more stringent of Direct Contact or Inhalation Pathways for the Arctic Zone

PQL practical quantitation limit (also known as reporting limit)

bold result or PQL exceeds the ARAR

shaded result exceeds the RBSL, and analyte is included in the CRE (Table 6-2)

not applicable, analysis not performed, or ARAR/TBC/RBSL does not exist

AZDC 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Direct Contact

MTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater

OFIG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Ingestion

OFMTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Migration to Groundwater

 Table 5-4

 Highest Detected Analyte and PQL Concentrations in Surface-Water Samples

Analytical			PCL				1986 L	JSACE	1996	AGRA	1996	6 E&E	1998	3 E&E	1999	E&E
Method	Analyte	PCL	Source	TBC	RBSL	Units	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]
	Diesel range															
AK 102	organics	1.5	С			mg/L			—		_	—	—	[0.12]	0.123	—
SW8080 Series	4,4'-DDT	1E-06	А	5E-07	0.00025	mg/L	0.0003	_	_	_	_	—	—	—	_	_
SW6000/	Aluminum	0.087	А	0.087		mg/L			_		0.136	[0.0239]	—	—	—	_
7000	Barium	2	С	0.0039	0.2	mg/L				_	0.192		_	—	_	
Series	Calcium	—	—	—		mg/L			—	_	20.6	—	—	—	—	—
	Iron	1	А	1		mg/L			_	_	0.39	[0.0053]	—	—	_	_
	Lead	0.001	A^4	0.0025		mg/L			—	[0.002]	0.003	[0.0028]		—	—	—
	Magnesium	_	_			mg/L			_		8.2		—	_	_	-
	Manganese	0.05	А	0.08		mg/L			_		0.0355		—	—	—	_
	Potassium	_	_	373		mg/L				—	1.1		—	—		
	Sodium	_	_	—		mg/L				—	1.93		—	—		
	Zinc	0.07	A^4	0.12	0.5	mg/L			_		0.0206	[0.0038]	_	_		
SW8260	Acetone	33	С	1.5	3.3	mg/L			—	[0.02]	0.00135	[0.010]	—	[0.0050]	—	—
	Toluene	1	С	0.0098	0.1	mg/L				[0.001]			0.0010	[0.00013]	—	_

- mg/L milligrams per liter
- PCL Potential cleanup level
- TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards
- A ARAR 18 AAC 70.020 Alaska Water Quality Criteria Manual (December 2008) Fresh Water, most stringent criteria
- A4 18 AAC 70.020 Alaska Water Quality Criteria Manual (December 2008) Hardness Dependant Water Quality Reference Appendix A
- C 18 AAC 75.345 (April 2012) Table C Groundwater Cleanup Levels
- ⁴ ARAR is hardness dependent; a hardness value of 50 mg/L was assumed for calculations.
- PQL practical quantitation limit (also known as reporting limit)
- bold result or PQL exceeds the ARAR
- shaded result exceeds the RBSL, and analyte is included in the CRE (Table 6-2)
 - not applicable, analysis not performed, or ARAR/TBC/RBSL does not exist
- RBSL Risk-based screening level (Hazard Quotient = 0.1 or Cancer Risk = 10^{-6}) more stringent of Direct Contact or Inhalation Pathways for the Arctic Zone

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 Table 5-5

 Highest Detected Analyte and PQL Concentrations in Groundwater Samples

Analytical			PCL				1996	E&E	1997	E&E	1998	E&E	1999) E&E
Method	Analyte	PCL	Source	TBC	RBSL	Units	Result	[PQL]	Result	[PQL]	Result	[PQL]	Result	[PQL]
AK 101	Gasoline range organics	2.2	С		_	mg/L	0.761	[0.100]	—		_	—		—
AK 102	Diesel range organics	1.5	С			mg/L	76.1		0.73	[0.27]	0.15	[0.11]	0.107	[0.105]
SW8260	Acetone	33	С		3.3	mg/L	0.00183					_		—
	2-Butanone	22	С	6	2.2	mg/L	0.00612					—		—
SW8310	Anthracene	9.6	А	7E-07	1.1	mg/L	0.00110					—		—
	Fluorene	1.3	А		0.15	mg/L	0.00532					—		—
	Naphthalene	0.73	С	0.00001	0.073	mg/L	0.350	_	_		_	—	_	—
	Phenanthrene	11	С	0.000003	1.1	mg/L	0.00417	_	_		_	—	_	—
SW8080	4,4'-DDD	0.0035	С	0.000004	0.00035	mg/L	0.0173	_	—	[0.0010]	_	[0.0071]	—	[0.0530]
Series	4,4'-DDT	0.000001	А	0.000004	0.00025	mg/L	0.0311	_	_	[0.0010]	_	[0.0087]	_	[0.0530]

mg/L milligrams per liter

PCL Potential cleanup level

TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards

A 18 AAC 70.020 - Alaska Water Quality Criteria Manual (December 2008) - Fresh Water, most stringent criteria

C 18 AAC 75.345 (April 2012) - Table C Groundwater Cleanup Levels

PQL practical quantitation limit (also known as reporting limit)

bold result or PQL exceeds the ARAR

shaded result exceeds the RBSL, and analyte is included in the CRE (Table 6-2)

— not applicable, analysis not performed, or ARAR/TBC/RBSL does not exist

RBSL Risk-based screening level (Hazard Quotient = 0.1 or Cancer Risk = 10⁻⁶) - more stringent of Direct Contact or Inhalation Pathways for the Arctic Zone

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Table 5-6 Highest Detected Analyte and PQL Concentrations in Fish-Tissue Samples

Analytical					1997	E&E	1998	E&E
Method	Analyte	RBSL	Source	Units	Result	[PQL]	Result	[PQL]
SW8080	Aroclor 1254	0.218	F	μg/kg	1400	[10]	870	[26]
Series	Aroclor 1260	0.218	F	μg/kg		[10]	190	[12]
	4,4'-DDD	1.82	F	μg/kg		_	480	[0.57]
	4,4'-DDE	1.28	F	μg/kg		_	740	[0.75]
	4,4'-DDT	1.28	F	μg/kg		_	79	[0.06]
	2,4'-DDD	_	—	μg/kg		_	62	[0.11]
	2,4'-DDE	_	—	μg/kg		_	15	[0.05]
	Aroclor 1016/1242	0.218 [†]	F	µg/kg	_		6.1	[3.5]

µg/kg micrograms per kilogram

F EPA Region 3 Fish Tissue Risk-Based Screening Levels with a target hazard quotient of 0.1 and cancer risk of 1.0E-06, modified for site-specific consumption rates. See Table F-1c for a full list of assumptions.

PQL Practical Quantitation Limit

bold result or PQL exceeds the RBSL

shaded result exceeds the RBSL, and analyte is included in the CRE (Table 6-2)

not applicable, analysis not performed, or RBSL does not exist

+ more stringent RBSL of individual Aroclors listed

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Table 5-7 Cumulative Risk Evaluation

СОРС	Highest Detected Site Concentration	RBC ^{2,6}	Units	Site Concentration/RBC	Risk at Site Concentration ^{3,4}				
Carcinogens; Soil/Se	diment; Direct contact	pathway ¹							
Aroclor 1254	17.8	3.8	mg/kg	4.68E+00	4.7E-05				
4,4'-DDT	38.2	29	mg/kg	1.32E+00	1.3E-05				
4,4'-DDE	0.00062	29	mg/kg	2.14E-05	2.1E-10				
4,4'-DDD	31.4	41	mg/kg	7.66E-01	7.7E-06				
				Total	6.8E-05				
Carcinogens; Soil/Se	diment; Inhalation path	way ¹							
Aroclor 1254	17.8	25	mg/kg	7.12E-01	7.1E-06				
4,4'-DDT	38.2	2200	mg/kg	1.74E-02	1.7E-07				
Naphthalene	0.042	42	mg/kg	1.00E-03	1.0E-08				
				Total	7.3E-06				
Carcinogens; Ground	Iwater/Surface Water ¹								
4,4'-DDT	0.0311	0.0025	mg/L	1.24E+01	1.2E-04				
4,4'-DDD	0.0173	0.0035	mg/L	4.94E+00	4.9E-05				
				Total	1.7E-04				
Carcinogens; Fish Tis	ssue ¹								
Aroclor 1254	1.4	0.00218	mg/kg	6.42E+02	6.4E-03				
Aroclor 1260	0.19	0.00218	mg/kg	8.72E+01	8.7E-04				
Aroclor 1016/1242 ⁷	0.0061	0.00218	mg/kg	2.80E+00	2.8E-05				
4,4'-DDT	0.079	0.0128	mg/kg	6.17E+00	6.2E-05				
4,4'-DDE	0.74	0.0128	mg/kg	5.78E+01	5.8E-04				
4,4'-DDD	0.48	0.0182	mg/kg	2.64E+01	2.6E-04				
				Total	8.2E-03				
Carcinogenic Cumulative Risk									

Table 5-7 Cumulative Risk Evaluation

	Highest Detected			Site	Risk at Site
COPC	Site Concentration	RBC ^{2,6}	Units	Concentration/RBC	Concentration ^{3,4}
Non-carcinogens; So	il/Sediment; Direct cont	act pathway ¹			
4,4'-DDT	38.2	61	mg/kg	6.26E-01	6.3E-01
4,4'-DDD	31.4	240	mg/kg	1.31E-01	1.3E-01
Naphthalene	0.042	1900	mg/kg	2.21E-05	2.2E-05
				Total	7.6E-01
Non-carcinogens; So	il/Sediment; Inhalation	pathway ¹			
Naphthalene	0.042	180	mg/kg	2.33E-04	2.3E-04
				Total	2.3E-04
Non-carcinogens; Gro	oundwater/Surface Wat	er ¹			
4,4'-DDT	0.0311	0.018	mg/L	1.73E+00	1.7E+00
4,4'-DDD	0.0173	0.073	mg/L	2.37E-01	2.4E-01
Naphthalene	0.350	0.73	mg/L	4.79E-01	4.8E-01
				Total	2.4E+00
Non-carcinogens; Fis	sh Tissue ¹				
Aroclor 1254	1.4	3.74	mg/kg	3.74E-01	3.7E-01
Aroclor 1016/1242 ⁷	0.0061	13.1	mg/kg	4.66E-04	4.7E-04
4,4'-DDD	0.48	93.6	mg/kg	5.13E-03	5.1E-03
				Total	3.8E-01
			Non-carcir	nogenic Cumulative Risk	3.6

Notes:

¹ Methodology and risk-based concentration (RBC) followed Cumulative Risk Guidance (ADEC 2008)

² RBC is for Arctic Zone; data from Cumulative Risk Guidance (ADEC 2008)

³ Risk at site concentration = (site concentration/RBC) x 10⁻⁵

⁴ Carcinogenic cumulative risk and cumulative Hazard Index are rounded to one significant figure; individual carcinogenic risks and hazard indices are rounded to two significant figures (ADEC 2008, page 11)

 5 HQ at site concentration = (site concentration/RBC) x 1

⁶ RBC for more stringent Aroclor used for Aroclor 1016/1242

Abbreviations:

CODC	Contominant of Dotontial Concorn
COPC	Contaminant of Potential Concern
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
HI	Hazard Index for noncarcinogenic risk
HQ	Hazard Quotient for noncarcinogenic risk
RBC	risk-based concentration

Conclusions:

• Calculated carcinogenic cumulative risk exceeds screening criterion (1 x 10⁻⁵) for soil.

• Calculated risk exceeds noncarcinogenic Hazard Index screening criterion (1) for soil.

Note: In accordance with the ADEC Cumulative Risk Guidance (June 9, 2008), DRO and lead are not included in the CRE.

				COPC	Basis
Contaminant of Potential Concern	Affected media	Date and media of highest-concentration sample	Highest Concentration (No. of Samples Exceeding PCL or RBSL out of Total Samples*)	PCL Exceeded	Substantial contribution to cumulative risk
Diesel Range	Soil & sediment	1996; SL	1,300 mg/kg (2/70)	\checkmark	
Organics	Surface water & groundwater	1996; GW	76.1 mg/L (2/46)	✓	
Naphthalene	Surface water & groundwater	1996; GW	0.350 mg/L (1/29)		✓
Methylene Chloride	Soil & sediment	1994; SL	0.019 mg/kg (1/58)	\checkmark	
	Soil & sediment	1996; SL	31.4 mg/kg (2/81)	\checkmark	✓
4,4'-DDD	Surface water & groundwater	1996; GW	0.0173 mg/L (1/51)	\checkmark	✓
	Fish	1998; FT	0.480 mg/kg (8/29)		✓
4,4'-DDE	Fish	1998; FT	0.740 mg/kg (10/29)		\checkmark
	Soil & sediment	1996; SL	38.2 mg/kg (2/81)	\checkmark	✓
4,4'-DDT	Surface water & groundwater	1996; GW	0.0311 mg/L (3/51)	\checkmark	
	Fish	1998; FT	0.079 mg/kg (7/29)		✓
Araclar 1254	Soil & sediment	1996; SD	17.8 mg/kg (33/112)	\checkmark	✓
A100101 1254	Fish	1997; FT	1.4 mg/kg (35/49)		✓
Aroclor 1260	Fish	1998; FT	0.190 mg/kg (22/49)		✓
Aroclor 1016/1242	Fish	1998; FT	0.0061 mg/kg (3/49)		✓
Lood	Soil & sediment	2001; SL	1,170 mg/kg (2/46)	\checkmark	
Leau	Surface water & groundwater	1996; SW	0.003 mg/L (2/12)	\checkmark	

 Table 5-8

 Summary of Contaminants of Potential Concern

Media considered affected where the COPC was detected above PCLs or RBSLs

- mg/kg milligrams per kilogram
- mg/L milligrams per liter
 - SL soil
 - SD sediment
- SW surface water
- GW groundwater
- FT fish tissue
- * Total number of samples analyzed for COPC; includes QA/QC duplicates/triplicates; does not include background samples

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6.0 DISCUSSION, CONCLUSIONS, AND RECOMMENDATIONS

This section includes a discussion of the nature and extent of contamination, potential migration pathways, potential risks, and recommendations.

6.1 Nature and Extent of Contamination

The highest levels of analytes detected in the soil, sediment, surface-water, groundwater and fish-tissue samples in the sampling events are summarized in the previous section, Tables 5-2 through 5-6. The following sections summarize the results in the context of PCLs and risk-based screening levels (RBSLs), and draw conclusions regarding the nature and extent of contamination in various media at the site. Figure 6-1 depicts sample locations that exceed PCLs for one or more COPC.

6.1.1 Buried Debris

Debris that may have been buried at the Umiat landfill during site-demolition activities in 1973 includes demolition wastes, drums, and heavy equipment. Types of debris observed on the surface include 55-gallon drums, oil drums, lead-acid batteries, transformers, cable, pipe, and equipment tracks. Examples of these materials are shown in photographs in Appendix C. We assume wastes remaining in the landfill consist of a heterogeneous mix of inert solid waste, potentially contaminated soil, and potential contaminant sources such as drums and other containers, batteries, and transformers.

The presence of permafrost would have limited the possible depth of excavation and waste burial at the landfill. The 1997 RI soil borings measured the active layer to be between 5.5 feet and 17.5 feet bgs in the landfill area. The active layer refers to ground that freezes in winter and thaws during summer, the base of which usually coincides with the top of permafrost.

The USGS geophysical investigation estimated the horizontal extent of buried debris to be about 5.5 acres. If the areas between cells are included, the overall extent is about 8 acres. This estimate is generally confirmed by other geophysical investigations.

The geophysical investigation during the 1994 E&E RI estimated the landfill depth to be about 9 feet bgs, and potentially as deep as 18 feet bgs. The USGS estimated the depth of burial to be as deep as 13 meters (43 feet) bgs. GeoTek's estimate of burial depth ranged from 8 feet to 17 feet bgs. The debris burial-depth estimates are an uncertainty, as the various geophysical studies and reported observations of persons involved in the 1973 landfill creation provide widely varying estimates. The 2011 GeoTek geophysical investigation was designed to assess the basal depths of debris burial at the landfill, whereas the USGS data were collected as part of

a multi-site investigation designed to enhance the BLM's ability to characterize subsurface conditions using geophysical methods in a permafrost environment. Because of the focused purpose of the GeoTek investigation, their conclusions could be considered more reliable than those of the USGS. Nonetheless, the variations in landfill debris burial depth estimates results in a degree of uncertainty.

6.1.2 Soil

Soil ARARs, TBCs, RBSLs, and highest detected concentrations of analytes in soil samples are summarized in Table 5-2. GRO, RRO, PAHs, and SVOCs were not detected in soil above ARARs or RBSLs.

DRO was detected above its PCL (230 mg/kg) in one soil sample and field duplicate at 3 feet bgs during the installation of MW-6 in 1996. The highest concentration of DRO detected in sediment was 54 mg/kg, well below the PCL.

Methylene chloride (at 0.019 mg/kg) was the only VOC detected above its ADEC migration-togroundwater soil cleanup level (0.016 mg/kg) in one 1994 soil-boring sample. Methylene chloride was detected at similar levels in 13 other soil samples and seven sediment samples, but none exceeded the cleanup level and all but two detections were flagged (most likely as estimated values, though flags were not defined). Methylene chloride is considered a COPC at the Umiat landfill; however, given that methylene chloride is a common laboratory contaminant, additional sampling may be warranted to determine whether the analyte is in fact present.

The highest detection of PCBs (specifically Aroclor 1254) in soil was 2.3 mg/kg, which exceeds the PCL of 1 mg/kg, in a sample from 1.5 feet bgs at the base of the excavation where a PCB-containing transformer and PCB-contaminated soil were removed in 2001. There does not appear to be a continuous or widespread area of PCB-contaminated soil; Aroclor 1254 was only detected in two other soil samples, at levels below the PCL of 1 mg/kg. PCBs are presumed to be associated with transformers and electrical equipment at the landfill. PCBs are a COPC at the Umiat landfill.

One soil sample and its field duplicate exceeded the ADEC soil-cleanup level for the pesticides 4,4'-DDD (7.2 mg/kg) and 4,4'-DDT (7.3 mg/kg). They were detected at 31.4 mg/kg and 38.2 mg/kg, respectively, in the sample and duplicate collected at a depth of 3 feet bgs in the boring for MW-6 during the 1996 RI. While this was the only location where 4,4'-DDD and 4,4'-DDT were detected above PCLs, they were detected at lower levels in soil samples from the following locations: BH 11-6 (in 1994); MW-3, MW-4, MW-6, SB-44, SB-45, SB-47, SB-49, SB-50, and SB-51 (in 1996); SB-182 (in 1997); and background samples collected away from the landfill. The low-level detections in these widespread locations and background

samples is more indicative of widespread spraying of DDT than a localized region of contaminated soil originating from a point source (with the exception of MW-6). 4,4'-DDD and 4,4'-DDT are COPCs at the Umiat landfill.

Arsenic was detected above its ADEC soil-cleanup level (3.9 mg/kg) in 23 soil samples. Detected levels of arsenic in soil ranged from 1.0 mg/kg to 8.4 mg/kg. Arsenic results for the project-sample set are not significantly different from background-sample set (see Section 5.4). This suggests arsenic probably occurs naturally in the soils at a concentration range spanning the Method Two soil cleanup level. Based on our statistical comparison of project-sample results to background results, and the natural abundance of this element in arctic soils, it is not considered a COPC at the Umiat AFS landfill. Arsenic is not considered an analyte of concern requiring further evaluation in the FS process, and a PRG will not be recommended for this element.

Lead was detected in soil at 598 mg/kg in sample *96-UMT-401-SS*, collected from soil-boring SB-47 in 1996 (Figure 4-3), where "vehicle batteries and assorted debris" were identified. It was also detected at 1,170 mg/kg at the base of an excavation where lead-contaminated soil was removed in 2001. The ADEC Method Two cleanup level for lead in the Arctic Zone is 400 mg/kg. Lead is presumed to be associated, at least in part, with lead-acid batteries in the landfill. Lead is a COPC at the Umiat landfill.

Soil contamination exceeding PCLs or RBSLs appears to be associated with discrete items of buried debris (such as transformers or lead-acid batteries). This suggests contaminated soil may be present at random locations throughout the landfill; additional site characterization (i.e., drilling and sampling) is unlikely to identify all such locations. This will affect the nature of response action targeting soil contamination; response actions should target the landfill as a whole unit rather than isolated pockets of contamination.

6.1.3 Sediment

Highest detected concentrations of analytes in sediment samples are summarized in Table 5-3. GRO, DRO, RRO, PAHs, and SVOCs were not detected in sediment above PCLs or RBSLs.

PCBs were more widely distributed in sediment than in soil. Aroclor 1254 was detected in 38 sediment samples (out of a total of 69 samples, including duplicates/triplicates), at or above the RBSL of 0.1 mg/kg in 32 samples, and above the PCL of 1 mg/kg in two samples. No other Aroclors were detected in sediment. The wider distribution in sediment is likely due to leaching from point sources in the landfill followed by downgradient sorption to sediment, though the highest detection in sediment (17.8 mg/kg, sample *96-UMT-232-SD* at location LB) is likely a point source as well.

Pesticides 4,4'-DDD and 4,4'-DDT were widely distributed in sediment samples, though they were not detected above the PCLs of 7.2 mg/kg and 7.3 mg/kg, respectively. 4,4'-DDD was detected in 10 sediment samples, ranging from 0.0036 mg/kg to 0.65 mg/kg, and 4,4'-DDT was also detected in 10 sediment samples, ranging from 0.0024 mg/kg to 0.059 mg/kg. 4,4'-DDE was not detected in sediment or soil at the site. As with PCBs, the wider distribution in sediment is likely due to leaching from point sources in the landfill followed by downgradient sorption to sediment, though the highest detection of 4,4'-DDD in sediment (0.65 mg/kg, sample *-02SD* from the 1986 USACE sampling event) may indicate a point-source.

Arsenic was detected above its ADEC soil-cleanup level (3.9 mg/kg) in two sediment samples. Detected levels of arsenic in sediment ranged from 2.8 mg/kg to 7.1 mg/kg. As with arsenic in soil, the arsenic results for the project-sample set are not significantly different from the background-sample set (see Section 6.1.2), and arsenic is not considered a COPC at the Umiat landfill.

Lead was detected in sediment samples ranging from 4.50 mg/kg to 22 mg/kg, below the PCL of 400 mg/kg. Lead was also detected in background sediment samples ranging from 4.70 mg/kg to 16.6 mg/kg. While lead is considered a COPC for the site (see Section 6.1.2), sediment is not considered to be affected by lead contamination based on these results.

As with contaminated soil, the presence of PCBs and pesticides in sediment is presumed to be related to wastes buried in or eroding out of the landfill. Sediment PCB and pesticide contamination exceeding PCLs or RBSLs appears to be more widespread than in soil, likely due to leaching, sorption, and deposition of contaminants in sediment originating from point sources within the landfill, or due to historic area-wide spraying of pesticides, in the case of 4,4'-DDD and 4,4'-DDT. Response actions targeting the landfill should consider contaminants in sediment downstream of the landfill.

6.1.4 Surface Water

Surface-water criteria and highest detected concentrations of analytes in surface-water samples are summarized in Table 5-4. The results of sampling in the seasonal stream indicate petroleum hydrocarbons, VOCs, SVOCs (including PAHs), PCBs, and pesticides were not present above reporting limits in surface water; however, reporting limits for PCBs and 4,4'-DDT were above the 18 AAC 70 Water Quality Criteria (PCL) of 0.000014 mg/L and 0.000001 mg/L, respectively, which constitutes a data gap for the site (see Section 6.4.3).

Lead and aluminum concentrations in 1996 exceeded 18 AAC 70 Water Quality Criteria. Lead in surface water may be attributed to the elevated lead concentrations in soil at the landfill; lead is considered a COPC in surface water (also groundwater due to the close hydrological

connection). As noted in Section 5.4, there was no statistically significant difference between aluminum concentrations in project samples vs. background samples. Aluminum is not considered a COPC at the Umiat landfill.

6.1.5 Groundwater

Groundwater is in close hydrological connection with surface water at the site, and as described in Section 5, groundwater results were compared to the same PCL, TBCs, and RBSLs as surface water. DRO was detected at 76 mg/L in MW-4 and at 4.0 mg/L in MW-6 in 1996; remaining detections of DRO and other petroleum hydrocarbons were below PCLs. Naphthalene (a PAH commonly associated with petroleum-related contamination) was detected above the RBSL but below the PCL in MW-4 in 1996, and thus included in the CRE and listed as a COPC in groundwater (and by connection, surface water) for the site.

Pesticides were also detected in two wells at the landfill. 4,4'-DDD was detected at 0.0173 mg/L in MW-6, above the ADEC Table C groundwater cleanup level (PCL) of 0.0035 mg/L. 4,4'-DDT was detected at 0.0311 mg/L in MW-6, and 0.000105 mg/L in MW-4, above the Water Quality Criteria (ARAR) of 0.000001 mg/L. 4,4'-DDT was not detected in any other wells; however, the reporting limit for 4,4'-DDT was above the PCL in each case. 4,4'-DDD and 4,4'-DDT are considered COPCs in groundwater (and by connection, surface water) for the Umiat landfill.

PCBs were not detected in groundwater at the site; however, reporting limits for PCBs were above PCLs. We cannot state with certainty if PCBs are present above the PCL of 0.000014 mg/L in surface water or groundwater at the site (see Section 6.4.3). Given the concentrations of PCBs detected in fish tissue (summarized below), the presence of PCBs at low levels in surface water seems likely, though contact with sediment may be the more significant exposure pathway between contaminated media and fish in the seasonal stream.

6.1.6 Fish Tissue

Fish tissue RBSLs, RBCs, and the highest detected concentrations of analytes in fish-tissue samples are summarized in Table 5-6. The PCBs Aroclor 1254, Aroclor 1260, and Aroclor 1016/1242 were detected in fish tissue above RBSLs. Detected concentrations ranged from 0.00074 mg/kg to 1.4 mg/kg for Aroclor 1254, 0.0003 mg/kg to 0.190 mg/kg for Aroclor 1260, and 0.0021 mg/kg to 0.0061 mg/kg for Aroclor 1016/1242. Aroclor 1260 and Aroclor 1016/1242 were not detected in soil, sediment, surface water, or groundwater at the Umiat landfill; this suggests fish may be impacted by contaminant sources other than the landfill.

The pesticides 4,4'-DDD, 4,4'-DDE, and 4,4'-DDT were detected in fish-tissue samples in excess of their RBSLs. Detected concentrations ranged from 0.00007 mg/kg to 0.480 mg/kg for 4,4'-DDD, 0.00012 mg/kg to 0.740 mg/kg for 4,4'-DDE, and 0.00004 mg/kg to 0.079 mg/kg for 4,4'-DDT. Each of the three analytes was detected in every fish sample, and there were no apparent differences between results for fish caught in the seasonal stream, upstream of the slough in the Colville River, or downstream of the slough. Additionally, 2,4'-DDD and 2,4'-DDE were detected in fish, though no RBSLs were available for these isomers; in each case they were detected in association with the 4,4'- parent compound, and are likely degradation products of the primary pesticide. The ubiquitous nature and relatively even distribution of these contaminants in fish implies the source may be from long-range atmospheric transport or historic spraying of pesticides in the area, and is less indicative of contamination from point sources within the landfill, though these sources may contribute to the concentrations in fish. It should be noted the fish can only be present in the landfill stream for a fraction of the year, when surface water is present.

Additional discussion of fish-sampling results can be found in the various risk assessments conducted for the site, summarized in Section 4.0 and referenced in Section 7.0.

6.2 Conceptual Site Model

We prepared a CSM depicting potential sources of chemicals, release mechanisms, means of retention in or migration to exposure media, exposure routes, and receptors. The CSM describes contaminant fate-and-transport mechanisms. A complete pathway from the source of chemicals to the receptor is necessary for chemical exposure to occur. Required elements for a complete exposure pathway are:

- a source of potentially toxic chemicals (e.g., primary sources, such as contents of drums or tanks, or a secondary source, such as contaminated soil);
- a mechanism of chemical release to the environment (e.g., spillage to the ground);
- a mechanism of retention in, or transport to, an exposure medium (e.g., adsorption to soil or leaching from soil to shallow subsurface water and subsequent transport as a dissolved constituent to a nearby surface-water body);
- a point of contact between receptor and exposure medium (e.g., a person digging or an animal burrowing in contaminated soil); and/or
- an intake route for the receptor (e.g., ingestion of impacted soil or water).

Human health and ecological CSMs are depicted in Figures 6-2 and 6-3.

6.2.1 Sources and Release Mechanisms

The sources of contamination at the Umiat landfill are contaminated soil and buried debris, which is presumed to contain residual amounts of fuels, PCBs, and other chemicals.

6.2.2 Exposure Media

Impacted media at the Umiat landfill include soil, sediment, surface water, groundwater, and fish tissue.

6.2.3 Migration and Retention Mechanisms

The primary physical processes affecting contaminant concentrations and migration include dispersion, dilution, and sorption. Volatilization of organic contaminants and airborne transport of contaminated soil may also occur. Also, debris items such as transformers and batteries may be transported downstream during floods.

Based on the types of contaminants detected at the landfill and their distribution, the greatest potential for contaminant migration in the landfill area is soil/sediment transport during flood events that overwash and erode the landfill. PCBs, pesticides, metals, and petroleum hydrocarbons may bind with the soil and sediment and be redistributed. The sediments may move toward the lower reaches of the stream and be carried toward the Colville River. Chemicals have been detected in sediment samples in the seasonal stream, some in excess of TBC concentrations, indicating contaminant migration has occurred.

Migration of contaminants through the subsurface could occur through the active zone during thaw periods. The top of permafrost at the landfill is estimated to be between 5.5 feet and 17.5 feet bgs. The groundwater gradient, generally toward the northeast, may fluctuate and the resulting flow direction may vary depending on the elevation of water in the river. Flooding of the river will raise the water table in the slough, and may result in flow in the seasonal stream.

Erosion of the landfill is a migration pathway that could produce releases of COPCs to the Colville River.

The low volatility of DRO and RRO, the low detected concentrations of fuels and VOCs, and the low ambient temperatures make significant volatilization unlikely. Microbial degradation of DRO, and especially RRO, is likely to be slow due to low temperatures and subsurface distribution of the contaminants; therefore, petroleum hydrocarbons in the soils are not anticipated to naturally attenuate prior to the landfill eroding.

Given the low volatility of residual concentrations of volatile compounds detected in the soil, air transport of contaminants is not expected to be a significant mode of contaminant migration at the landfill.

The pesticide DDT and PCBs have very low migration potentials in surface water, groundwater, and air because of the low solubility of the compounds in water and low volatility (vapor pressure); however, they are readily sorbed to soil and sediment, the primary media of concern at the Umiat landfill. DDT and PCBs are persistent in the environment because they are not degraded by microbial action and do not readily oxidize. Furthermore, they have the potential to bioaccumulate and biomagnify in the food chain, which causes their concentrations to increase in higher trophic levels (particularly dominant predators, including humans).

6.2.4 Exposure Routes/Receptors

The human receptors and associated intake routes evaluated in the CSM are based on a limited evaluation of likely current and future uses of the site. As depicted in the human health CSM, receptors are residents of Umiat, site visitors, site workers, and subsistence users. Complete exposure pathways are incidental ingestion of surface soil, inhalation of particulates, ingestion of fish and game, and dermal contact with surface water and sediment. As shown in the ecological CSM, receptors are terrestrial and aquatic species. Exposure routes are ingestion of and direct contact with surface water, and sediment, and plant uptake of surface soil.

6.3 Risk Evaluation

The highest detected concentrations from historic sampling events are summarized in Tables 5-2 through 5-6, and were compared to RBSLs as well as PCLs and TBCs. The highest detected concentrations exceeding the RBSLs were included in the CRE, as described in Section 5.4. The following chemicals are considered carcinogenic by one or more exposure pathways and contributed to cumulative cancer risk for the site: arsenic; Aroclor 1254; Aroclor 1260; Aroclor 1016/1242; 4,4'-DDD; 4,4'-DDE; 4,4'-DDT; and naphthalene. The following chemicals also have non-carcinogenic toxic effects, and contributed to the cumulative HI for the site: arsenic; Aroclor 1254; Aroclor 1254; Aroclor 1016/1242; 4,4'-DDD; 4,4'-DDD; 4,4'-DDD; 4,4'-DDT; and naphthalene. As noted previously, arsenic in soil is likely attributable to natural (background) presence of the element in Arctic soil, and Aroclor 1260 and Aroclor 1016/1242 are not necessarily associated with site-specific contaminant sources; however, they were included in the CRE to evaluate cumulative risk from all known risk-contributors detected in various media at the site.

Cumulative risk calculations indicate a human cancer risk of 8×10^{-3} and a non-cancer HI of 4. Consumption of fish had the largest single contribution to the cancer risk, while direct contact

with contaminated soil/sediment had the largest single contribution to the non-cancer HI. Both the cancer risk and HI exceed the risk thresholds of 1×10^{-5} and 1, respectively.

For the CRE, soil and sediment were considered a single exposure medium due to the seasonal nature of these matrices at the site and the potential for soil to become sediment from ongoing erosion of the landfill. Similarly, groundwater and surface water were considered as a single exposure medium due to their close hydrological connection. This approach conservatively and accurately evaluates cumulative risk for the site not only for current conditions but also considering potential future erosion or migration of contaminants.

Petroleum hydrocarbons and lead are not included in cumulative risk calculations, consistent with ADEC regulations and the June 2008 *Cumulative Risk Guidance*; however, DRO exceeded the most stringent soil-cleanup level (over-40-inch migration-to-groundwater; 230 mg/kg) in one location, and lead exceeded the Arctic zone direct-contact soil cleanup level (400 mg/kg) in two locations. Lead was also detected above the ADEC Water Quality Criteria of 0.001 mg/L in one surface-water sample. These two contaminants are considered COPCs.

The CRE is based on the highest results from a limited number of samples collected from a highly heterogeneous landfill. Given that sources of contamination are likely to be scattered in isolated pockets throughout the landfill, the CRE may not fully account for the potential risk caused by future erosion of the landfill. Due to the heterogeneity of contamination, this risk is not easily quantified and may require a site-specific risk assessment or additional remedial actions to ensure residual soil contamination and containers of fuel or other product in the landfill will not pose a risk to the environment if the soil or containers erode into the river. This uncertainty should be taken into account when evaluating remedial alternatives for the site, and regardless of the option implemented, cumulative risk should be re-evaluated following implementation.

6.4 Data Gaps

Potential gaps in the data set fall into three general categories: where analyses were not performed, where the data set is not sufficient to draw conclusions or where no data were collected, and "non-detected" compounds whose practical quantitation limits (PQLs) were greater than their corresponding comparison criteria.

6.4.1 Analyses Not Performed

Analyses for dioxins and asbestos at the landfill have not been performed. Dioxins are commonly present where PCB-containing soils or PCB-contaminated soil were subject to burning, and have been detected at one of the Umiat exploratory wells about 2 miles from the

landfill. Asbestos was a common component of building materials prior to 1978 and may be present in demolition debris disposed at the landfill.

6.4.2 Limited Data Sets

The Umiat landfill has a limited data set that prevents a thorough assessment of the extent of debris and soil contamination. The data set is not large enough to determine the extent of contaminated soil with certainty, which introduces a degree of uncertainty about the evaluation of remedial alternatives for the landfill; however, given the likelihood of soil contamination associated with point sources in the landfill, the heterogeneity of contamination would make further delineation difficult and costly, and may not be warranted. Conflicting historical information exists regarding the depth of buried debris. In 2011, the USACE conducted a geophysical survey to resolve the depth discrepancies between two previous surveys (1994, 2006) and verify the lateral extent of debris. The 2011 survey concluded the bottom depth of metal debris ranged from 8 to 17 feet bgs and will be utilized as the basis for future volume estimates.

6.4.3 PQL Evaluation

To assess analytical sensitivity and evaluate potential data gaps, we compared PQLs from sampling events to the various comparison criteria discussed in Section 5.0 (PCL, TBC, and RBSL concentrations, see Table F-1). Some of the source reports do include PQL data; however, the bulk of the data includes only PQLs for non-detected analytes where detections were also present in that event's data set. Except for the 1996 RI, only summary tables of detected analytes from the various reports were available, i.e., complete laboratory data packages were not. We did not perform an evaluation of all the PQLs for each analyte; however, some general conclusions can be drawn regarding analytical sensitivity for datasets for which PQLs were available.

In general, analyses were adequately sensitive to quantify individual analytes below PCLs and RBSLs. PQLs for petroleum hydrocarbons and associated VOCs and PAHs were generally below PCLs and RBSLs.

Soil and sediment PQLs for metals were generally below cleanup levels, with the exception of antimony. Antimony PQLs exceeded the cleanup level for two of four sediment samples and a majority of soil samples. Antimony was detected in one soil sample (*96-UMT-401-SS*) at 0.950 mg/kg, below the cleanup level of 3.6 mg/kg. Antimony is commonly used as a plating agent in lead-acid batteries and alloys for bullets. While antimony may be present in soil associated with lead-acid batteries, it is likely collocated with lead contamination in soil.

Additional sampling to delineate soil contamination (including potential antimony contamination), as noted in Section 6.4.2, is not likely to be beneficial.

VOC analytes 1,2-dibromoethane and 1,2,3-trichloropropane had soil and sediment PQLs exceeding the ADEC migration-to-groundwater soil-cleanup level, as well as surface-water and groundwater PQLs exceeding the ADEC groundwater-cleanup level. Standard analytical techniques are not sufficiently sensitive to detect these analytes at concentrations below the cleanup levels. There are no suspected sources of these compounds at the landfill, so this data gap is not considered significant.

Multiple SVOC analytes had elevated soil and sediment PQLs (Tables F-2C and F-3C); these analytes have not been detected at the landfill, and there are no suspected sources of these analytes at the landfill, so this data gap is not considered significant.

With the exception of a couple of isolated samples, soil and sediment PQLs for PCBs and pesticides were below the most stringent ADEC soil cleanup levels (PCLs); however, surface-water and groundwater PQLs for PCBs, 4,4'-DDT, and a number of other pesticides (detected at the site) exceeded the relevant Water Quality Criteria (PCLs). The PCL for PCBs is 14 nanograms per liter (ng/L), the ARAR for 4,4'-DDT is 1 ng/L. Standard analytical techniques are not sufficiently sensitive to detect or quantify these analytes in the ng/L range. While PQLs are elevated for 4,4'-DDT, the analyte was detected in groundwater (MW-5 and MW-6) as high as 0.0311 mg/L, and in surface water as high as 0.0003 mg/L.

Elevated PQLs prevent delineation of DDT in the seasonal stream, but they are less significant because DDT has been identified above cleanup levels in surface-water and groundwater. Due to the elevated PQLs for PCBs in surface water and groundwater, we cannot determine if PCBs are present above the most stringent water-quality standard. The significant levels of PCBs in soil, sediment, and fish suggest PCBs may be present in the water, but confirmation of its presence is not likely to be warranted. If the point sources of PCBs and 4,4'-DDT within the landfill and associated sediment are removed or contained, groundwater and surface-water concentrations of these contaminants will quickly attenuate due to their hydrophobic nature and affinity for solid surfaces.

Overall, data gaps presented by elevated PQLs are either not significant or not likely to affect the feasibility or selection of remedial alternatives for the site.

6.5 Conclusions

Based on our evaluation of existing data on the Umiat landfill, we make the following conclusions:

- Based on our evaluation of data generated during previous investigations, COPCs at the site are PCBs (specifically Aroclor 1254); 4,4'-DDD; 4,4'-DDE; 4,4'-DDT; DRO; naphthalene; methylene chloride; and lead.
- PCB Aroclors 1260 and 1016/1242 have been detected in fish tissue.
- Based on a CRE, the carcinogenic risk posed to human health by these COPCs exceeds the risk management standard of 1 x 10⁻⁵ and the non-carcinogenic hazard index exceeds the risk management standard of 1. Furthermore, the contents of the landfill are unknown and likely contain other contaminants that would become COPCs if released to the environment.
- The landfill area is adequately defined (about 8 acres).
- Landfill depth estimates vary, hence volume calculations vary.
- Buried debris is known to include contaminant sources such as lead-acid batteries and transformers. The landfill is suspected to contain drums and other containers with unknown contents and may include contaminated soil.
- Contaminants have migrated from the landfill to surface soil, sediment, surface water, and groundwater.
- Contaminants are present in fish tissue.
- Data do not suggest defined contaminant sources in the landfill that can be targeted for removal.
- Episodic channel flooding with water velocities high enough to cause surface erosion and contaminant transport occurs annually.

Uncertainty exists concerning the exact nature, distribution, and volume of the contaminants in the landfill. The heterogeneous distribution of wastes in a landfill makes it unfeasible to identify all discrete contaminant sources within the landfill. No amount of sampling, short of complete excavation of the contents, would reveal whether there is another small transformer filled with PCB oil that is, or may become, a point source for release of highly concentrated contaminants. If the landfill is removed, the sampling and waste characterization can be performed in conjunction with the removal effort.

We recommend the USACE proceed with preparation of the draft FS report. Additional sampling to identify limits of contamination in sediment may be warranted if the proposed remedial alternative involves dredging or cleanup of contaminated sediment.



beo 3/13/2013 Date: Levels.mxd Cleanup Exceeding 6-1 Report/Fig R mxd/Final Umiat\AV -1/11544 T:\Project\31 name:


RECEPTORS AND ROUTES OF EXPOSURE

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	S	CHANNON & WILSON	, INC. FIG. 6-2

FINAL REMEDIAL INVESTIGATION REPORT Umiat Landfill, Alaska U.S. Army Engineer District, Alaska March 2013 Page 102 31-1-11544-005



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	SHAN Geotech	NNON & WILSOI	N, INC.	FIG. 6-3			

FINAL REMEDIAL INVESTIGATION REPORT Umiat Landfill, Alaska U.S. Army Engineer District, Alaska March 2013 Page 104 31-1-11544-005

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APPENDIX A

AGENCY COMMENTS AND CONTRACTOR RESPONSES

REVI COM	CVIEW PROJECT: Umiat Landfill DMMENTS DOCUMENT: Draft Remedial Investigation Report - Feb 2012 Location: Umiat, Alaska						
U.S. A ENGI	U.S. ARMY CORPS OF ENGINEERS DATE: 3/30/2012 Action REVIEWER: Aaron Shewman PHONE: 753-5558			ion taken on comment by: Shannon & Wilson, Inc.			
Item No.	Drawing Sheet No., Spec. Para.		COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
1.	Page 1	Paragrap "AFS". consiste paragrap Paragrap "landfill	ph 1, sentence 3. Insert "was" between "Umiat" Also, the dates in this sentence do not appear to nt with the dates stated on page 7, section 2.2, ph 1, please correct as necessary. ph 1, last sentence. Insert "located" between I," and "about".	and be		Agreed. We will correct the sentence. We will make the dates consistent in the two sections. Agreed. We will correct the sentence.	
2.	Page 2	Section contami the milit on a glo correct.	1.1, sentence 1 following the bullet list. Chemic nation of fish in this context is not only attributa tary, but also "atmospheric transport and biotran bal scale. Please revise this statement to be mor	al ble to sport" e		We will address this issue in the summary of the fish studies and indicate the contribution from atmospheric transport and biotransport is an uncertainty.	
3.	Page 7	Paragrap list of hi Section	ph 1, last sentence. Please add "east landfill" to istoric names for the Umiat landfill (based on Pa 2.3, paragraph 2.)	the ge 9,		Agreed. We will revise the statement to read "The landfill has been variously referred to in other reports as the Unit C Landfill, Area 11, Area of Concern 7 and east landfill."	
4.	Page 8	Section to add a overland	2.2, paragraph 3, last sentence. It seems appropriate sentence to indicate the AFS is also accessible via travel in winter.	riate ria		Agreed. We will revise the statement.	
5.	Page 11	Section foot per "per s measure Paragrap stream r statemen landfill of cap". Paragrap sentence is this tr with sen	2.4.1.4, paragraph 1, sentence 5. "is about 1 of square mile." Would a more accurate statement square mile of drainage basin above the point of ement"? If so, please correct. ph 2, sentence 3. The sentence reads, "The sease uns through the landfill". Options for more corr nts would be "The seasonal stream runs across th cap", or "The seasonal stream runs over the land ph 3, sentence 1. Strike the third "the". Also, the e implies gauge data is being collected through to ue? Either way, please correct to avoid contradi- ntence 3.	cubic be onal ect ne fill is oday, ction		Agreed. We will revise the statement. Agreed. We will clarify the statement. Agreed. We will correct the sentence and state that discharge data has been collected through 2009.	
í		Paragra	pii 5, semence 2. insert (lacing downstream) be	ıween			

REVI COM	EW MENTS		PROJECT: Umiat Landfill DOCUMENT: Draft Remedial Iı	nvestig	gation Report - Fel	o 2012 Location: Umiat, Alaska		
U.S. ARMY CORPS OF ENGINEERS		PS OF	DATE: 3/30/2012 REVIEWER: Aaron Shewman PHONE: 753-5558	Acti	Action taken on comment by: Shannon & Wilson, Inc.			
Item No.	Drawing Sheet No., Spec. Para.		COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
		"bank" Paragra USGS 1	and "of". ph 3, sentence 3. Revise the sentence to read, " measured"	The		Agreed. We will clarify the statement. We will revise the statement.		
6.	Page 12	Section sentence permafr clarify.	2.4.1.5, paragraph 2, sentence 6. Currently, the e reads, "Groundwater extends to the top of cost" Where does groundwater extend from?	Please		Agreed. We will clarify that groundwater extends from the water table (the top of groundwater) to the permafrost. We will report the measured range of water table depths.		
7.	Page 13	Section be, "Bro other ne Paragra periodic	2.4.2.2, sentence 4. A more correct statement w own bears travel along the Colville River corrido earby river corridors" ph 2. It seems the Spectacled Eider is also cally present. If so, please add it here.	vould or and		Agreed. We will clarify the statement as you suggest. According to Mr. Ted Swem of US Fish & Wildlife Service, "Specs generally occur and nest much nearer to the coast, and I am aware of no observations of spectacled eiders near Umiat." Please let us know if you have information to the contrary.		
8.	Page 21	Section state wł borings	4.1.3, last paragraph on page, sentence 1. Plea nere permafrost was generally encountered in the	ise hese		Agreed. We will describe the areal distribution of borings in which permafrost was encountered.		
9.	Page 22	Section sentence concent Comple sedimen location shown o	4.1.3, complete paragraph 1 on this page, last e. Please provide the "bottom values" of the ration range. ete paragraph 3, sentence 4. PCB concentration nt samples are described, but where are the san as on the map? Are they "LA", "LB", and "LC on Figure 4-3? Please clarify.	s in ple		Agreed. We will add the information. Agreed. We will clarify in the text and figure that surface water and sediment samples were collected at locations LA, LB, and LC.		
10.	Page 24	Partial J "stream	paragraph on page, first sentence. Change "ster i".	am" to		Agreed. We will correct the misspelling.		
11.	Page 26	First co 6). Is it paragra please a	mplete paragraph (comment also relates to Figure possible to show the 4 MWs described in this ph on Figure 4-6 despite the large map scale? add the 4 MWs to the figure.	ure 4- If so,		We will add the monitoring well locations to Figure 4-6.		
12	Page 31	Section	4.2.4, paragraph 2, last sentence. This informa	tion		We will revise the statement as suggested.		

REVI	EW	PROJECT: Umiat Landfill S DOCUMENT: Duck Remedial Investigation Report Eab 2012 Logation: Uniot Alaska						
U.S. ARMY CORPS OF ENGINEERS		S OF DATE: 3/30/2012 REVIEWER: Aaron Shewman PHONE: 753-5558	Action taken on comment by: Shannon & Wilson, Inc.					
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)			
		also appears in Section 4.2.3, so recommend adding to provided reference by modifying to read "(E&E, 2003 Section 4.2.3)	o the 3, see					
13.	Page 32	Section 4.3.1, paragraph 1, sentence 1. Delete "No." consistency with an earlier report section. Section 4.3.2, sentence 1. Delete the second "a".	for	We will revise the statement. We will correct this typographic error.				
14.	Page 33	 First partial sentence at top of page. Correct "994" to "1994". Complete sentence 3. Delete the second "of". Complete paragraph 2, sentence 1. Delete "be". Section 4.4, paragraph 2, sentence 1. Replace "is in p with "is considered". Sentence 2. Consider modifying sentence to read, "discussion in this report is limited to the hydrologic Paragraph 4, sentence 2. Considering modifying to "Modeling results indicated the entire landfill area worbe" 	read lace" "The " read, ould	Agreed. We will correct the omission. Sentence 3: We will rewrite the sentence to read "GeoTek confirmed five of the six cell locations previously identified by USGS" We will make the other suggested changes.				
15.	Page 34	Partial sentence on page. Consider modifying to read "According to the model, during the flood peak, the v over the landfill would be between 4 to 6 feet per seco (fps), which would be high enough"	, elocity ond	Agreed. We will make this addition.				
16.	Table C-3	Other Federal Waste Transport Regulations, NPDES, Comments and Analysis/Rationale for Decision. It se this cell (associated with NPDES) should read the san "NPDES" on Table C-1. Please correct as necessary. End of Comments	ems ne as	We will make the cells read the same.				

REVI COM	EW MENTS	PROJECT: Umiat Landfill DOCUMENT: Draft Remedial	Investig	ation Report - Feb	2012 Location: Umiat, Alaska		
U.S. ARMY CORPS OF ENGINEERS		S OF DATE: April 4, 2012 REVIEWER: Lisa Geist PHONE: 753-5742	Actio	Action taken on comment by: Shannon & Wilson, Inc.			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
1.	Cover Page	Formatting – larger font for report title. Include F property/project number in title. Remove Prepared Shannon & Wilson, Inc, address, project number, a deliver order manager. Put details on inside cover instead.	UDS 1 by and page		Agreed. We will make the changes.		
2.	Cover Page	Native file should be provided. Word document fi report does not include a cover page.	le of		Agreed. We will submit the revised RI report following MED requirements.		
3.	General	One COMPLETE pdf document must be submitted includes ALL the attachments, appendices, figures etc. PDF must comply with all general and FUDS formatting requirements, checklist must be filled of submitted.	d, that s, tables, -specific ut and		Agreed. We will submit the revised RI report following MED requirements.		
4.	General	Please remove the Contractor Name from the top r header of each page, including appendices.	ight		Agreed.		
5.	General	Please correct the duplicative page numbering betw Executive Summary and Main text.	ween the		Agreed. We will correct this.		
		Intentionally blank pages should also be identified and/or numbered (e.g., inserted figures with no pag and blank page afterwards).	as such ge number		Agreed. We will make this change.		
6.	Acronyms	Spell out in text upon first use. Example, NPRA in Executive Summary. Air Force Station. EPA, AD ADOT&PF, FAA, USACE, PCBs, DDT.	n EC,		Agreed. We will correct this.		
7.	Exec Sum, Page 1	What is basis for stating "ecological risks are prese	ent"?		We will add the following clarification in the Risk Assessment section, and remove the statement that ecological risks are present. "The original baseline Ecological Risk Assessment (E&E, 1997) determined that the ecological risks to piscivorous (fish-eating) organisms are unacceptable according to ADEC and EPA criteria. However, these risks		

REVII COMN	EW /IENTS	PROJECT: Umiat Landfill DOCUMENT: Draft Remedial Inv	vestig	ation Report - Feb	2012 Location: Umiat. Alaska	
U.S. ARMY CORPS OF ENGINEERSDATE: April 4, 2012 REVIEWER: Lisa Geist PHONE: 753-5742Action take			on taken on commen	nt by: Shannon & Wilson, Inc.		
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
8.	Exec Sum, Page 1	Text states that the landfill "was apparently constru- and closed in 1973". How does that correlate with t aerial photos in Appendix A which show bare ground 1974 and rows of equipment and/or drums in 1976, an vegetation/bare ground again in 2001?	cted he in d		 estimates were based on modeled concentrations in fish derived from limited sediment data, not on actual fish tissue analyses. In August 1997, E&E collected additional fish tissue and sediment samples to better characterize the risks of Aroclor 1254. E&E's March, 1998 <i>Technical Memorandum</i>, <i>Human Health and Ecological Risk Assessment</i> recalculated hazard quotient using maximum detected concentrations and concluded that Aroclor 1254 in the Unit C seasonal stream does not pose a risk to ecological receptors." E&E's 1996 Historical Site Uses Technical Memorandum states, "In 1973, the Naval Petroleum Oil Shale Reserves contracted Pacific Architects and Engineers, Inc., to clean up the Umiat campMost of the drums were buried at the east landfill (Area 11) During an inspection of Umiat in 1974, [e]ach company's camp had started its own solid waste dump on top of the east dump (Area 11)" The bare ground in the 1974 and 1976 photos presumably represent the time for vegetation to regrow following construction of the landfill in 1973. 	
9.	Page 9	What is source document or reference for ADEC 1974 1976 inspections of Umiat?	and		We will supply the reference for both paragraphs, which is "E&E, 1996."	
10.	Page 9	What is reference for E&E site inspection for EPA in 1	1981?		Agreed. We will provide the reference, which is "E&E, 1996."	
11.	Page 14,	Please use updated census information for combined v	illage		Agreed. We will use the 2011 Alaska	

REVII COMN	EW /IENTS	PROJECT: Umiat Landfill DOCUMENT: Draft Remedial	Investig	ation Report - Feb	2012 Location: Umiat, Alaska	
U.S. AI ENGIN	U.S. ARMY CORPS OF ENGINEERS DATE: April 4, 2012 Act REVIEWER: Lisa Geist PHONE: 753-5742			ion taken on comment by: Shannon & Wilson, Inc.		
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	I	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
	Section 2.5.1	populations. According to Alaska Community Da Community Information Summaries, populations a Anaktuvuk Pass 325, Nuiqsut 434, and Wainwrigh total 1,331. Or should Barrow with pop. 4,309 als included in the total?	atabase are at 572, o be		Department of Labor estimate, which is a total of 1,331 for Nuiqsut, Wainwright, and Anaktuvuk Pass.	
12.	Page 19, Section 4.0	Regarding the statement: "Note that cleanup levels screening levels that the report authors used to eva data were those they considered applicable at the t may not be current." This assumption needs to be when discussing particular data, otherwise later co are misleading. I believe all data should be compa most current standards.	and luate their ime and reiterated mparisons red to		Agreed. We will remove the references to screening, guidance, and regulatory levels in Section 4. We will evaluate the previous results in Section 6.1 using the screening criteria (ARARs and TBCs) described in Section 5.	
13.	Page 20, Section 4.1.1	Suggest rephrasing first sentence into active tense. initiated a hazardous waste sampling and assessme program at Umiat in 1986, under the Defense Envi Restoration Program (DERP).	USACE ent ronmental		Agreed. We will rephrase this sentence to read as suggested.	
14.	Page 20, Section 4.1.1	Please explain EPA toxicity analysis (e.g., media s for leachate testing and why) and corresponding re limits (e.g., characteristic waste or not).	ampled gulatory		Agreed. We will include the 1986 report's explanatory paragraph included in its "Explanation of Analytical Methods" section, as well as the RCRA limits. The reference does not state the rationale for analyzing the samples for EP Toxicity?	
15.	Page 20, Section 4.1.2	Are the 11 areas indentified during the 1992 site in all pertaining to the landfill? Please clarify. The s should only pertain to the landfill.	ummary		Agreed. We will clarify that the landfill was one of the 11 areas at Umiat, and limit the discussion to the landfill results.	
16.	Page 21, Section 4.1.2	Please clarify statement – analyte concentrations d exceed regulatory (whose?) or guidance (screening	id not g?) levels.		Agreed. See our response to Item 12.	
17.	Page 21, Section 4.1.3	Please clarify – were the 187 soil borings and 20 n wells installed throughout Umiat, and not just rela landfill/Unit C?	nonitoring ted to the		We will change the sentence to read: "They drilled 12 soil borings and installed 6 monitoring wells (three temporary and 3	

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COM	MENTS	DOCUMENT: Draft Remedial I	nvestig	ation Report - Feb	2012 Location: Umiat, Alaska	
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i 		T				1
					permanent) at the landfill."	
18.	Page 22 Page 23, Section 4.1.4	EPA Region 3 RBC is defined for PCBs, but not for comparisons made later in this section. ADEC North soil cleanup levels are referred to, but comparison let not presented. Other samples are compared to screen levels, with no source given. DRO and GRO in grou at 3 MWs are compared to EPA Region 3 RBCs, and other 3 MWs are compared to screening levels – are the same levels? Chlorinated pesticides were detected groundwater, but no comparison made? Was the concentration detected in subsurface soil also above regulatory or screening level? Which 2 sediment samples had the PCB exceedance. Even though AGRA did not compare their data to re or screening levels, shouldn't that be done now?	other i Slope vels are ing indwater l then these ed in a <u>s?</u> gulatory		Agreed. See our response to Item 12.Agreed. Our responses to Tamar Stephen's comments list the appropriate cleanup levels. We will compare detected pesticide concentrations to applicable surface water cleanup levels. We will state whether subsurface soil concentrations exceeded the applicable soil cleanup levels. Agreed. We will state which samples exceeded applicable PCB cleanup levels.Agreed. See our response to Item 12.	
20.	Page 23	Text indicates sample <i>1639-05</i> is not shown on figur Figure 4-4 includes a sample <i>1639-5</i> , is this the corres sample number/location? Perhaps the missing sample 1639-6? Or the location on your figure is mislabeled Figure 4-4 would be more useful if the type of sample location was identified (soil, sediment, water). Which sample contained PCBs at 0.3 mg/kg? Which samples contained PAHs, the sediment, soil, or wate Which sediment sample had lead at 22 mg/kg? Please review the AGRA report. According to the o report, 3 sediment, 3 water, and 3 soil samples were collected by AGRA.	e, but ect le is l. le 6 r? riginal		AGRA's text and tables include a zero in the last two digits of the sample numbers, but their figure omits the zero in the sample number. Sample 1639-5 on Figure 4-4 should actually be labeled 1639-06. We will correct this error by making the labels on the figures consistent with AGRA's text. We will identify the sample matrix in Figure 4- 4. We will change the text to read "Of the 31 samples AGRA collected, nine were at the landfill."	
21.	General	Please be consistent and refer to regulatory levels or			Agreed. See our response to Item 12.	

REVI	EW	PROJECT: Umiat Landfill	1	(
U.S. A ENGI	MENTS RMY CORP NEERS	S OF DATE: April 4, 2012 REVIEWER: Lisa Geist PHONE: 753-5742	al Investig Acti	ation Report - Feb on taken on comme	nt by: Shannon & Wilson, Inc.	
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		· · · · · · · · · · · ·				1
22.	Page 24 Page 24 Page 26, Section	 Screening levels, not guidance levels. Please clarify/streamline presentation of samplin Distinguish between soil, sediment, and groundy For example: Text indicates subsurface soil was for DRO, pesticides and PCBs. Then later text st was not detected in any samples – does that inclu- subsurface soil? Text states no pesticides, VOCs were detected in surface soils or sediments – wh surface soil samples collected? Bulleted text indi- sediment samples were analyzed for PCBs only, text states no pesticides, VOCs, or SVOCs were Why are geometric means reported? What comp value was used for sediment? Please remove references to work conducted at t Test Wells, in particular all text related to dioxim 	ng results. water results. analyzed tates GRO ude to or SVOCs ere were licates but later detected parison he other as and PCBs		We will clarify the data presentation and indicate which analyses were run on which media. Geometric means were reported in the reference documents and summarized in this RI. In order to clarify this discussion, we will remove the geometric mean information. Agreed. We will remove these references.	
24.	4.1.7 Page 28, Section 4.2.1	at TW 9, as this is not related to the landfill. Were PCDFs and benzo(a)pyrene really identified for the landfill area? Were the burn pits associate landfill area?	ed as a COC ted with the		They were not. We will remove the reference to these analytes and the burn pits, which were not associated with the landfill.	
25.	Page 30, Section 4.2.2	Where are Units A and B? These conclusions do to apply to the Landfill, which is Unit C.	on't appear		Agreed. Unit A refers to the Airstrip Operations Complex and Runway Lake, and Unit B refers to the Main Gravel Pad and Floatplane Lake. We will remove conclusions that reference those areas, which do not apply to the landfill.	
26.	Page 31, Section 4.2.3	The bullet: "Burbot and other fish that migrate in slough are responsible for higher concentrations Colville River fishery upstream and downstream seem to be contradicted by other text which indi Slough does not affect levels found in burbot can Nuiqsut, and that atmospheric deposition is also	nto the in the of Umiat." cates the ught near a significant		We will revisit this conclusion to define the extent (i.e., distance) of upstream and downstream effects, if possible.	

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		source.		
27.	Page 31, Section 4.2.4	What do you mean by the ATSDR 2001 health consultation not being available for review for this RI?	 We have since received a copy of this report and will include it in the revised draft RI. The 1997 E&E HH and Eco RA concluded that PCBs in the Unit C sediments may pose unacceptable ecological and human health risks. The Tech Memo also recalculated the human health risk and concluded: Potential excess lifetime cancer risks and HIs for current Umiat residents and subsistence hunters associated with consumption of fish caught from the Colville River near Umiat were less than regulatory benchmarks established by ADEC and EPA; Potential excess lifetime cancer risks and HIs for the future residents were greater than ADEC and EPA criteria. This demonstrates that risks associated with ingesting fish contaminated with Aroclor 1254 are limited to the Unit C seasonal stream and that risks are not above regulatory guidance values within the Colville River. 	
28.	Page 77, Section 6.1.1	The purpose of conducting an additional geophysical survey in 2011 was to resolve the data gap regarding debris burial depth. The survey information will never match, so why is this still considered a potential data gap? Maybe an uncertainty?	We will clarify that this is an uncertainty rather than a data gap.	
29.	Page 79,	How can PCBs not be considered a COPC for sediment? At	See response to Ms. Stephen's Item No. 10. We	

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	Section 6.1.3	a minimum, the maximum value detected does exceed ADEC cleanup level for soil. Why are no PRGs prope for sediment?	the		will evaluate sediment results using ADEC migration-to-groundwater (MTG) soil cleanup levels. PCBs exceed these cleanup levels and will be identified as a COPC. We will use ADEC MTG soil cleanup levels as PRGs for sediment.	
30.	Page 83, Section 6.4.2	Text indicates that further geophysical investigations of define the depth of debris would be beneficial. Please more specific about the limitations of the most recent geophysical investigation and why that effort did not minimize uncertainty or reduce perceived data gaps.	o be 2011		We will clarify that the 2011 geophysical investigation was specifically designed to assess basal depth of the Umiat landfill, and could be considered more reliable than the USGS data, which was collected as part of a multi-site investigation. We will discuss the limitations of the 2011 geophysical investigation, which were primarily related to the contractor's inability to collect data in a grid pattern after they were denied permission to cut vegetation during the field investigation.	
31.	References 7.0	The most recent citation for ADEC regulations 18 AA is dated October 1, 2011.	C 75		Agreed. We will update the date of this reference.	
32.	References 7.0	Please include FRMD file numbers for all FUDS-spec documents.	ific		Agreed. We will provide this information in the list of references.	
33.	Appendix A	Although there are multiple aerial photo images provi- herein, they are not referred to anywhere in the RI rep appears the original size photo and a zoomed-in versic each of the 3 years of aerials are provided. What observations can be made from these aerial photos?	ded ort. It on of		We will reference the aerial photos and present our observations on the photos in the text of the RI.	
34.	Appendix A, B, C, D, E	Individual PDFs of the files are not necessary, but sho rather be included in the complete PDF of the report.	uld		Agreed.	
35.	Appendix D	How were points plotted on the various figures – do y have lat/long information to create a table of historical	ou		Coordinates for the samples were not provided in the available reports. We relied upon the	

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Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	1	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
h							
		sample locations?			report figures and lined up features on the figures with georeferenced air photos. All samples except for the red "Areas" on Figure 4- 8 were georeferenced using aerial photography.		
36.	Figure 2-1	Land ownership map. Please remove the white FUDS polygon indicating the Property boundary from the 19 land transfer. Zoom into a better scale for the landfill/a only.	54 airstrip		Agreed. We will make the requested changes.		
37.	Figures 4-1 through 4- 10	Please include a comprehensive figure which depicts <i>A</i> the sampling locations by media. It would helpful to a graphically show exceedances across the various phas the RI, instead of just a location.	ALL ilso es of		We will include figures with the requested information.		
38.	Figure 4-3	What do the solid black points labeled LA, LB, and LO to? They are not depicted in the legend.	C refer		They refer to the 1996 RI sediment sample locations. We will add this symbol to the legend.		
39.	Figure 4-6	Make legend consistent with previous figures. Title <u>Approximate Sampling Locations</u> . Do not need the ex sample number designation shown in legend.	ample		Agreed. We will make the requested changes.		
40.	Figure 4-5, 4-7	What are the transects for? Fish samples, sediment, w depth?	ater		We will add this information to the text and/or figure.		
41.	Figure 4-7	Add sample points for surface water samples?			We will provide these, where they are available.		
42.	Figure 4-8	Add red point to legend. Create one legend. Can this information be overlain on the aerial photo like previo figures?	us		We will make the first two requested changes. Jacobs' sketch of the sample locations does not line up with the air photos. Regarding the red points ("Areas") on Figure 4-8, attempts at georeferencing the source figure were not successful. The source figure did not have an aerial background and did not have reference features that would allow us to position it in real coordinate space with any reliability.		

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43.	Figures	Why is there no figure depicting the geophysical in results from 2011?	vestigation	GeoTek reported their results correlated well with the USGS results. Their figure used red dots to indicate "hits", was overlain on the USGS results. We will include a copy of GeoTek's figure.	
		End of Comments			

REVI COMI	REVIEW PROJECT: Umiat Landfill COMMENTS DOCUMENT: Draft Remedial Investigation Report - Feb 2012 Location: Umiat, Alaska					
U.S. ARMY CORPS OF ENGINEERS		PS OF DATE: 3/21/2012 REVIEWER: Will Mangano PHONE: 753-5689	DATE: 3/21/2012 Action taken on comment by: Shannon & Wilson, Inc. PHONE: 753-5689 Action taken on comment by: Shannon & Wilson, Inc.			
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1.	Executive Summary and throughout	Please review and spell out the first use of each acronym. This comment applies to the Executive Summary and throughout the document. There are also multiple instance where acronyms are spelled out several times throughout to document.	es the		Agreed. We will correct this.	
2.	Sec.1.0, 1 st paragraph	Grammatical error for sentence "The Umiat AFS used by t"	the		Agreed. We will correct it to read "Umiat AFS was used by the".	
3.	Sec.2.0, 1 st paragraph	Grammatical error for sentence "Throughout this report, to former"	o the		Agreed. We will correct this.	
4.	Section 4.0, General Comment	This entire section could benefit by grouping all information for a given investigation and/or year into one subsection (i sampling, risk assessment, geophysical, associated figure). it is currently structured, the reader must flip back and fort between subsections to gather a complete picture from eac investigation/year. Grouping the information could make section more user-friendly.	on i.e., o. As th ch this		We would like to avoid reformatting Section 4 in this manner. We will be more clear in how we present the information in the existing format, so that it is more easily understood.	
5.	Section 4.0, General Comment	Beginning in Subsection 4.1.3 and throughout the rest of Section 4.0, references to sample results and groundwater wells become extremely vague. Statements like "PAHs we detected in six of the samples." and "DRO in monitoring v MW-4 was the only detected analyte in the 10 monitoring wells sampled at the landfill."	vere well		Agreed. We will clarify the presentation of results, stating which analytes were detected where, and indicate the sample matrix.	
		Which samples had PAHs? Which wells were sampled? References to this type of data should be more specific, so reader could refer to the respective figure from the text.	o the		we will present this information. See response above.	
6.	Section 5.1, 1 st paragraph	Grammatical error for sentence ", specifically Methods Two cleanup"			Agreed. We will correct this.	

REVI COM	EW MENTS	PROJECT: Umiat Landfill DOCUMENT: Draft Remedial In	vestigation Report - Fel	o 2012 Location: Umiat, Alaska	
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7.	Section 6.1.3, 1 st paragraph	Is the statement "No COPCs exist for sediment" accurat There are no promulgated ADEC cleanup levels for sed however, the presence of PAHs, PCBs, and pesticides in sediment still indicate contaminants of potential concern correct? Would PRGs for soil be applicable to the contaminants present in sediment?	e? iment; 1	We will apply the more stringent of ADEC Arctic Zone and migration to groundwater soil cleanup levels to sediment.	
8.	Section 6.1.5	Please list the analytes that exceeded the cleanup level groundwater under a COPCs list. I recognize that groundwater does not apply to "Arctic Zone", but the e was made to sample groundwater, so the data should b specified.	s for effort e	Following a review of ADEC's comments on the first draft, we agree that ADEC groundwater cleanup levels are applicable to this site. We will evaluate groundwater results using the cleanup levels.	
9.	Section 6.1.6	Same as comment 6, wouldn't the presence of PCBs, I DDE, and DDT indicate COPCs in fish tissue?	DDD,	We note that the discussion of the fish tissue as an affected medium will be substantially revised as a result of our review of additional reference sources.	
10.	Section 6.2.2	We have data that groundwater is contaminated. The of should not have this data excluded. Although regulation not currently recognize groundwater in the "Arctic Zon we know that contaminated groundwater does exist at landfill. This information should be incorporated into CSM.	CSM ons do ne", the the	Agreed. We will revise the CSM to reflect this.	
11.	Section 6.5, 4 th bullet	Groundwater should also be included here.		Agreed. We will correct this.	

REV CON	IEW IMENTS	PROJECT: Former Umiat Air F DOCUMENT: First Draft Reme	Corce Station Landfil dial Investigation Re	ll eport			
U.S. ARMY CORPS DAT OF ENGINEERS REV CEPOA-EN-ES-M PHO		PS DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on comment by: Shannon & Wilson, Inc.				
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)		
1	4.1.7, pg 26-27	This section should clarify the relevance of the investigation at Test Well 9 to the discussion of the landfill. Is there a migration pathway for PCBs from Well 9 to the landfill area?	Test	Agreed. We will remove the reference to Test Well 9 and dioxins, which were detected elsewhere on site.			
2	4.1.8, pg 27	The "small transformer" and "electrical device" are t different terms that have been used in the past to deso the same item, not two separate items as implied by t wording of this section.	wo cribe he	Agreed. We will remove the reference to an electrical device.			
3	4.2.4, pg 31	I have a copy of the Agency for Toxic Substances an Disease Registry (ATSDR) 2001 Health Consultation can provide a copy if it will be helpful to finalizing the report.	d n and nis	We have requested this document from ADEC and will review it for the second draft of the RI.			
4	4.3.3, pg 32	DEC has not received a copy of the 2011 GeoTek rep Final Technical Memorandum, Umiat Landfill Geophysical Survey, FUDS Project F10AK0243-08. Please provide a copy to DEC.	port:	This comment is directed at USACE, not Shannon & Wilson.			
5	4.4, pg 33	DEC has not received a copy of the 2011 Hydrologic		This comment is directed at USACE, not			

Shannon & Wilson.

We will revise the CSM to include these

exposure pathways and receptors.

Analysis of Umiat Landfill, FUDS Project F10AK0243-

This section relies on Method Two soil cleanup levels;

receptors that need to be considered that may not be protected by Method Two soil cleanup levels. A construction worker would have direct contact with surface and subsurface contaminants. Subsistence users, particularly for ingestion of fish, need to be considered.

however, at Umiat there are other exposure pathways and

08. Please provide a copy to DEC.

6

5.1, pg 61

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CON	IMENTS	DOCUMENT: First Draft Reme	dial Investigation Re	eport					
U.S. A OF EN CEPO	RMY COR GINEERS A-EN-ES-M	PS DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on commen	on taken on comment by: Shannon & Wilson, Inc.					
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7	5.1, pg 63	 This section discusses identification of compounds of potential concern (COPCs) in soil. a. It is not clear from this section how compose were retained for evaluation of cumulative. The second paragraph states that chemicals concentrations less than Method Two soil cleanup levels are considered to be protect human health. However, chemicals present one-tenth the Method Two soil cleanup levels should be retained to evaluate for cumulative effects. Later in the report, in section 5.6, the discussion of retaining compounds for cumulative risk evaluation if they exceed 1/2 the Method 2 cleanup level, but this inform also should be provided in section 5.1 so the two sections are consistent with each other. 	f Inds risk. at ve of t at els ve risk here is /10 of ation at the	a. We will clarify how compounds were retained for the CRE (i.e., those that exceeded 1/10 of the Method 2 cleanup level) and make the sections consistent.					
7	5.1, pg 63	 b. In the fourth paragraph in this section, the conclusion that the migration to groundwate exposure pathway soil cleanup levels do no apply is incorrect for this site. DEC policy, described in "Policy for Establishing Clean Levels for Sites in the Arctic Zone in Accor with 18 AAC 75, Article 3" (Guidance No. SPAR 99-3), states: "The department has n general determination that the presence of continuous permafrost in the arctic zone acc barrier for soil contaminant migration to a groundwater zone of saturation. Therefore migration to groundwater pathway does not naturally exist for sites located in the Arctic zone." However, groundwater in the landfil not typical suprapermafrost active zone wat the summertime, and perhaps to a lesser exiduring the rest of the year, the landfill is windows. 	er t as up rdance nade a ts as a the t c ill is ter. In tent thin a	b. Agreed. We will revise the CSM to reflect that groundwater is a transport pathway and affected medium. We will apply the more stringent of direct contact and outdoor inhalation Arctic Zone cleanup levels and migration-to- groundwater (MTG) cleanup levels to soil samples.					

REVIEW		PROJECT: Former Umiat Air Force Station Landfill					
COM	IMENTS	DOCUMENT: First Draft Reme	dial Ir	vestigation Re	port		
U.S. A	ARMY CORPS	S DATE: May 7, 2012	Action	taken on comment	t by: Shannon & Wilson, Inc.		
OF EN	IGINEERS	REVIEWER: Tamar Stephens, ADEC					
CEPO	A-EN-ES-M	PHONE: 907-451-2131					
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		hyporheic zone, that is, a zone where there i mixing of shallow groundwater and surface During the summer it is likely that the major the groundwater in the landfill originates fro surface water from the river, to re-emerge in the seasonal slough. Thus, a very close connection is present between groundwater surface water at this site. 18 AAC 75.345(f) requires that "groundwater that is closely connected hydrologically to nearby surface may not cause a violation of the water qualit standards in 18 AAC 70 for surface water or sediment." Since surface water is protected all uses in Alaska, including drinking water, 18 AAC 75.345 Table C groundwater and 1 AAC 70 Water Quality Standards apply to t water. Because of the close hydrologic connection between surface and groundwate this site, the groundwater is protected for us drinking water, and migration to groundwater cleanup levels do apply.	s flow. rity of om nto and) water ty r for , both 8 his er at e as er soil				

REV	EVIEW PROJECT: Former Umiat Air Force Station Landfill				
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U.S. ARMY CORPSDATE: May 7, 2012OF ENGINEERSREVIEWER: Tamar Stephens, ADECCEPOA-EN-ES-MPHONE: 907-451-2131		PS DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on commen	t by: Shannon & Wilson, Inc.	
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8	5.4, pg 63	This section states that groundwater results are compation to Table C cleanup levels, but are not enforceable at the site. Please see previous comment. Groundwater in the landfill is closely hydrologically connected to surface water, so groundwater from the landfill needs to meet water quality criteria at some point of compliance established to prevent adverse impacts to both sedime and surface water. Since one of the protected uses of surface water under 18 AAC 70 is for drinking water, more stringent of 18 AAC 75.345 Table C groundwate cleanup levels and the water quality standards in 18 A 70. For a more detailed discussion of how the regulate apply in this situation, please see the "Regulatory Approach to Managing Contamination in Hydrologica Connected Groundwater and Surface Water" (Technic Memorandum 01-005, Updated April 13, 2011), whice can be found on the Contaminated Sites Program web at: http://dec.alaska.gov/spar/csp/guidance/gw_sw.pdf .	rred his he nts the er AC ions ally cal h page	Agreed. We will include groundwater cleanup levels and surface water quality criteria as regulatory ARARs applicable to groundwater. We will evaluate groundwater results using the more stringent of 18 AAC 75.345 Table C or 18 AAC 70 water quality standards.	

REVIEW			PROJECT: Former Umiat Air Force Station Landfill					
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U.S. A OF EN CEPO	ARMY COR IGINEERS A-EN-ES-M	PS	DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on comment		nt by: Shannon & Wilson, Inc.		
Item No.	Drawing Sht. No., Spec. Para.		COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
9	5.5, pg 63	Plea con Lev use: repr <i>Col</i> <i>Ala</i> of t <i>Bun</i> <i>Stat</i> doc con asso will con	ase discuss the assumptions about the quantities of sumed in the EPA Region 3 Fish Tissue Screenin, rels with respect to quantities consumed by subsis- resent? A lot of work went into the fish tissue stu- orted in the <i>Evaluation of PCBs and DDTs in the</i> <i>ville River, Former Umiat Air Force Station, Umi</i> <i>ska</i> (E&E, 2003), and in the subsequent developm he 2003 ATSDR <i>Health Consultation, Review of</i> <i>rbot Samples, US Army USACE Umiat Air Force</i> <i>tion.</i> The RI should discuss these two important suments in more detail and use the information and clusions from these documents in discussion of ri- bociated with fish consumption. The ATSDR docu l provide more applicable information on typical sumption rates.	f fish g tence dy <i>at</i> , tent t sks ment		We will review and discuss the fish studies more closely and provide further discussion of risk from fish consumption.		
		And rep RE HU IN TH AL Pre	other significant document that is not referenced in ort is the 2003 DRAFT CRITICAL DOCUMENT VIEW REPORT NO. 39-EJ-XXXX-02 MAN HEALTH EFFECTS ASSOCIATED WITH A THE UNIT C SEASONAL STREAM (SLOUGH) A E UMIAT AIR FORCE STATION, COLVILLE RI ASKA (US Army Center for Health Promotion and eventive Medicine (USACHPPM))	PCBs T VER, l		summary of this reference.		

REV	REVIEW PROJECT: Former Umiat Air Force Station Landfill						
COM	IMENTS	DOCUMENT: First Draft Reme	dial Investigation Re	eport			
U.S. A OF EN CEPO	RMY COR GINEERS A-EN-ES-M	PS DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on commen	on taken on comment by: Shannon & Wilson, Inc.			
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)		
10	5.6, pg 63	The second paragraph concludes by saying that a cumulative risk evaluation (CRE) "was not conducted sediment data because ADEC does not include sediment cleanup levels in its regulations, and the NOAA SQu data are not promulgated cleanup criteria." However sediment data cannot be disregarded. There is the potential for direct contact with the sediment by reside construction workers, or subsistence fishers. Soil cle levels can be used to represent direct contact risks. Additionally, 18 AAC 75.354(d) states that "toxic substances in sediment may not cause, and may not reasonably be expected to cause, a toxic or other deleterious effect on aquatic life."	d on ient- iRT , lents, anup	We will apply soil cleanup levels to sediment sample concentrations. We will include sediment in the CRE and revise the CSM.			
11	6.6, pg 84	The third paragraph, second sentence, states: "It wou take a rigorous sampling effort to provide an accurate estimate of the landfill contents due to probable speci- variation." This paragraph understates the importance understanding that the heterogeneity of a landfill mak- impossible to sample sufficiently to identify contamin sources within the landfill. No amount of sampling, of complete excavation of the contents, would tell yo whether there is another small transformer filled with oil that is, or may become, a point source for release highly concentrated contaminants.	ld e of ces it nant short u r PCB of	Agreed. We will reword the paragraph and include text similar to your statements.			
		Comments from Ted Wu:					
1	5.0, pg 61	EPA Region 3 Fish Tissue Screening Levels are base a default fish consumption rate set at 54 g/day. An appropriate adjustment to the fish consumption rate (subsequent generation of site-specific screening level the calculator) based on subsistence fishers in the are warranted. In addition current screening hazard inde- for fish tissue is equal to 1 based on Table 5-1 footno The screening HI should = 0.1.	d on and ls by a is x (HI) te 3.	We will access the formulas used to calculate Region 3 screening levels and apply the actual fish consumption rate to obtain site-specific screening levels.			

REVIEW PROJECT: Former Umiat Air Force Station Landfill						
CON	IMENTS	DOCUMENT: First Draft Reme	edial I	Investigation Re	eport	
U.S. A	ARMY CORP	PS DATE: May 7, 2012	Actio	n taken on commen	t by: Shannon & Wilson, Inc.	
OF ENGINEERS REVIEWER: Tamar Stephens, ADEC						
CEPC	DA-EN-ES-M	PHONE: 907-451-2131		DEX/IEXX		LIGAED
No.	Drawing Sht. No., Spec. Para.	COMMENTS		KE VIE W CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
2	5.1, pg 61	There is strong evidence that the contaminated soil w have direct contact with surface water or contaminant migrate to the nearby surface water through the suprapermafrost groundwater; thus the screening lev- used in soil (direct contact or inhalation pathway) [ar appropriate in evaluating protection to the receiving surface water or sediment.	vill hts will els re] not		Agreed. Refer to our response to Ms. Stephen's Item No. 7b.	
		For sites with an adjacent surface water body, regula under 18 AAC 75.340(c) require soil cleanup levels developed under method two, three or four to be prot of surface water quality standards. In addition, regula under 18 AAC 75.345(f) require that groundwater ch connected hydrologically to nearby surface water no cause a violation of water quality standards in 18 AA 70.020 for the receiving surface water or sediment. Therefore, suprapermafrost groundwater should be evaluated as a transport medium for contaminant migration from soil to a receiving surface water body proposed soil cleanup levels and the cleanup action t at the site must result in reducing or eliminating this	tions tective ations osely t AC 7. The aken		Agreed. Refer to our response to Ms. Stephen's Item No. 8.	

If suprapermafrost groundwater is a potential transport medium for soil contamination to a groundwater zone of saturation, the proposed soil cleanup levels and the cleanup action taken at the site must result in reducing or eliminating this transport pathway so the receiving groundwater is not adversely impacted. This may occur where drinking water wells that access a subpermafrost aquifer are located in the vicinity of contaminated suprapermafrost groundwater.

transport pathway so water quality standards are met in the

receiving surface water and sediment.

Agreed. We will include a statement to this effect.

REVIEW		PROJECT: Former Umiat Air Force Station Landfill						
COM	COMMENTS DOCUMENT: First Draft Remedial Investigation Report							
U.S. ARMY CORPS OF ENGINEERS CEPOA-EN-ES-M		PS DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on commen	on taken on comment by: Shannon & Wilson, Inc.				
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)			
3	5.2, pg 62	The NOAA SQuiRT's values are based upon effects reported for benthic organisms (organisms that inhab bottom of an aquatic environment). They do not addr apply to bioaccumulation, adverse effects in higher th level organisms (biomagnification), and/or human he As such, compounds that are known (or suspected) to bioaccumulate and biomagnify may warrant further investigation. Wild food consumption pathway is of particular cond- residents, subsistence users, and recreational users at The parts of animals and plants consumed by subsiste harvesters vary greatly across Alaska. Consultation v subsistence users to determine relevant pathways, is strongly recommended. Contaminants from soil, sediment, surface water, or other plant and animal liff accumulate in plants and animals that are eaten by pe Although there are many ways to determine a chemic ability to bioaccumulate or biomagnify in the food cf EPA considers a compound with a BCF greater than to bioaccumulate in tissue (EPA 2004) "August 2004 <i>Persistent, Bioaccumulative, and Toxic (PBT) Profile</i> Office of Pollution Prevention and Toxics".	ti the ess or rophic ealth. o ern to a site. ence with e can cople. cal's nain, 1,000 bb, er,	We will include a discussion of which compounds will bioaccumulate and biomagnify. We will apply MTG soil cleanup levels to sediment results and include sediment in the CRE. We will provide a more comprehensive review of the fish studies and discuss their conclusions.				
		Thus any COPCs that are known to bioaccumulate an biomagnify should be assessed regardless of the scree levels in the mediums.	nd ening	We will add determination of risk from plant and animal consumption to the list of data gaps.				
4	5.5, pg 63	Please note comment 1 for the introduction section regarding fish screening levels.		We will make the requested changes.				
5	5.4, pg 63	Please note comment 2 regarding the ground water.		We will make the requested changes.				

REVIEW		PROJECT: Former Umiat Air Force Station Landfill				
COMMENTS DOCUMENT: First Draft Remedial Investigation Report						
U.S. ARMY CORPS OF ENGINEERS CEPOA-EN-ES-M		PS DATE: May 7, 2012 REVIEWER: Tamar Stephens, ADEC PHONE: 907-451-2131	Action taken on comment by: Shannon & Wilson, Inc.			
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
6	5.6, pg 63	The section on cumulative risk states a CRE was performed, then PRGs developed is confusing. No re of the CRE was noted in the section. Plus PRGs were based solely on soil cleanup levels and water quality standards. A calculated cumulative risk should be performed after cleanup of method 2 and chemical detected at 1/10 must be included when calculating cumulative risk under 18AAC 75.325(g).	e	We will discuss the results of the CRE in this section, and will clarify the discussion of PRGs.		
7	5.6, pg 63	In addition to sediment not being included in the cumulative risk calculation, the exposure pathway fro the consumption of fish also is not included. This re- in underestimating the cumulative risk, especially, w subsistence users are known to be consuming fish fro surface water in the area.	om sults hen om the	We will use the carcinogenic and non- carcinogenic fish tissue screening levels from the EPA Region 3 Fish Tissue screening level calculator as RBCs in the CRE.		
8	Table 6-1	There are some inconsistencies in Table 6-1. Soil sar for aluminum, cobalt, iron, and manganese also exce the PRG based on Table 5-2 and were not included in Table 6-1.	nples eded n	Table 5-2 presents a comparison of analytes detected in soil to applicable ARARs or TBCs. Aluminum, cobalt, iron, and manganese concentrations were compared to NOAA SQuiRTs because they do not have soil-cleanup levels. Table 6-1 presents those analytes identified as contaminants of potential concern based on their exceeding PRGs, which for soil are based on Method 2 soil-cleanup levels.		
9	Fig 6-1	Construction workers are a missing receptor on the C Disagree that dermal contact of surface soil is an incomplete exposure pathway for all 3 receptors, as w construction workers. Disagree that incidental ingestion of sediment is a mi pathway for all 3 receptors when PCB were detected maximum of 17.8 mg/kg and screening is set at 0.000 mg/kg.	CSM. well as inor at a 03	We will revise the CSM to include construction workers as receptors and dermal contact as an exposure pathway. We will remove the minor/major pathway differentiation to be consistent with ADEC guidance. We will change ingestion of sediment to a complete pathway.		

REVIEWPROJECT: Former Umiat Air Force Station LandfillCOMMENTSDOCUMENT: First Draft Remedial Investigation Report

U.S. ARMY CORPS DATE: May 7, 2012		Action taken on comment by: Shannon & Wilson, Inc.			
OF ENGINEERS		REVIEWER: Tamar Stephens, ADEC			
CEPOA-EN-ES-M		PHONE: 907-451-2131	1		
Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
[
10	Fig. 6-2	Disagree that sediment ingestion and direct contact for terrestrial pathway is incomplete.	r	We will change the ingestion and contact pathway to be complete.	
11	6.1.6, pg 79	Disagree with the statement there are no COPC for fis tissue at the Umiat landfill. DDT and Aroclor 1254 we detected in soil and sediment samples. These compour also bioaccumulate and table 5-6 shows contaminants above screening levels that are detected in the landfill.	h ere nds	We will include DDT and Aroclor 1254 as COPCs for fish tissue if the concentrations exceed screening levels calculated using an adjustment to the fish consumption rate (and subsequent generation of site-specific screening levels by the calculator) based on subsistence fishers.	
12	6.2.2, pg 80	Please note 2 nd comment above.		We will include groundwater as a transport medium through its connection to surface water.	
13	6.4.1, pg 83	Suggested including TCE as the chemical has been use extensively in the past at military facilities.	ed	We disagree. A total of 89 samples in soil, sediment, surface water, and groundwater have been tested for volatile organic compounds (including TCE). TCE was not detected in any of the samples.	
14	6.6, pg 84	Disagree with the statement the current risks from the COPCs are low. Levels in fish tissues far exceeded the screening criteria set forth in Table 5-6.	3	We will revisit the CRE and risk evaluation. We will screen concentrations in fish tissue, sediment, and groundwater against the screening and cleanup levels discussed in these review comments.	
15	Table 6-2	Soil samples for aluminum, cobalt, iron, and mangane also exceeded the PRG based on Table 5-2 and were r included in the CRE. It should also be noted that the cumulative risk evaluation doesn't include exposure pathways from surface water, wild food consumption, sediments.	se not and	See also our response to Item 8: soil cleanup levels have not been established for the referenced compounds, and they were therefore not included in the CRE. We will note that exposure to surface water, wild food consumption, and sediments, while not included in the CRE, are other factors to consider.	

REVIEWPROJECT: Former Umiat Air Force Station LandfillCOMMENTSDOCUMENT: First Draft Remedial Investigation Report

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U.S. A	RMY CORPS	DATE: 2012	Action taken on comment by:	Shannon & Wilson, Inc.	
OF EN	IGINEERS	REVIEWER: Jake Sweet			
CEPO	A-EN-ES-M	PHONE: 907-753-2694			
Item	Drawing	COMMENTS	REVIEW	CONTRACTOR RESPONSE	USAED
No.	Sht. No.,		CONFERENCE		RESPONSE
	Spec. Para.		A - comment accepted		ACCEPTANCE
	_		W - comment		(A-AGREE)
			withdrawn		(D-DISAGREE)
			(if neither, explain)		()

1	Figures 4-1 through 4-8	It would be helpful is sample results were placed on the figures.	We do not plan to present the results on the figures.	
2	Figure 4-3	There are three features marked "LA, LB and LC" that are not described on the legend. Please clarify what these locations are.	Agreed. We will clarify that these are the 1996 surface water and sediment sample locations.	
3	3 Tables 5-1 through 5-4 Many of these tables have data in the PQL column without a corresponding primary result. Where are the PQL numbers coming from? Having a PQL reported suggests there should be a primary result associated.		We included PQLs in these tables when that information was available from the source reference documents. A PQL without a corresponding primary result indicated the analyte was not detected. This information allows us to assess the absence of a contaminant with more confidence.	
4	Table 5-6	This table is the only one that uses $\mu g/kg$. Please use mg/kg to be consistent with the rest of the data.	Agreed. We will use consistent units (mg/kg in all the applicable tables).	

REVIEW COMMENTS		PROJECT: Umiat Landfill DOCUMENT: Interim Final Remedial Investigation Report - Oct 2012 Location: Umiat, Alaska				
U.S. ARMY CORPS OF ENGINEERS		S OF DATE: 11/02/2012 REVIEWER: Sam Bass, Geology, EMCX PHONE: 402-697-2654	Action taken on comment by:			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
1.	Page 7, Section 2.2	The Navy apparently owned the site from 1959 to 1977. Please provide additional detail regarding the types of activities/operations performed at the site (if available) during this time frame. What was the last date of DOD activities at the site? Are there other potentially responsible parties (including other government agencies) whose operations may be responsible for contamination at the site?		In response to this comment and comments from other reviewers, we have revised Section 2.2 for clarity.		
2.	Page 12, Section 2.5.1.5, second paragraph	The text states "Groundwater extends from the water table to the top of permafrost, which is commonly 2 feet to 3 feet bgs". Which is 2 to 3 feet bgs, the water table or the permafrost? This makes a difference when considering potential remedial actions.		We will clarify the text to indicate that 2 to 3 feet bgs is the depth to permafrost. We will state the depths to both suprapermafrost groundwater and the underlying permafrost at the main site and in the landfill area.		
3.	General comment	Separately I emailed Aaron Shewman, the Innovative Technology Advocate for Alaska District, information on a new technology that may apply at the site, if not at the landfill possibly to other areas at Umiat (such as Test Well 9). It is a self-contained mobile steam stripping device that according to the vendor and their literature has been used to remediate VOCs, SVOC, PAHs, and PCBs in soil to unrestricted use levels. You may wish to consider it during the Feasibility Study for the site.		We will take this information into consideration for the FS.		
		End of Comments				
REVIEW PROJECT: Umiat Landfill						
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COMI U.S. A ENGI	COMMENTSDOCUMENT: Interim Final RemedialU.S. ARMY CORPS OF ENGINEERSDATE: 12/18/2012 REVIEWER: Ed Bave, Compliance (EMCX) PHONE: 402-697-2634		Investigation Report - Oct 2012 Location: Umiat, Alaska Action taken on comment by:			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
1.	Section 3.0, last paragraph	Insert "potential" beforelist of ARARs havesince we are evaluating tentative ARARs during the RI. The FS will define ARARs for the proposed alternatives.		We will make the requested changes.		
2.	Section 3.1.1	Recommend staying away from POL-related ARAR discussions (i.e. 18 AAC 75) unless there is strong evidence the USTs held hazardous substances. POL is specifically excluded from the definition of a CERCLA hazardous substance.		We concur that the Underground Storage Tanks (18 AAC 78) regulations do not likely apply to the site, since we have found no mention of USTs, or UST-related contamination, on the site. We will clarify that 18 AAC 78 does not likely apply to the Umiat landfill. In addition, we will add the following text: "Petroleum, oil, and lubricants (POL) contaminated sites fall under the CERCLA petroleum exclusion and are therefore being addressed under the authority of the Defense Environmental Restoration Program (DERP), United States Code (USC), Title 10, Section 2701, et seq The DERP provides authority to clean up petroleum contamination when it may pose an imminent and substantial endangerment to public health, welfare or the environment. Alaska's Site Cleanup Rules (18 AAC 75 Article 3 Oil and Other Hazardous Substances Pollution Control) are risk-based and indicative of when an imminent and substantial endangerment to the public health or welfare or the environment has been mitigated."		
3.	Significant	Tables D-1 – D-3 lists ~ 52 potential ARARs which is an overly		We will make the requested changes.		

REVI COM	REVIEW PROJECT: Umiat Landfill COMMENTS DOCUMENT: Interim Final Remedial I		al Investigation Report - Oct 2012 Location: Umiat, Alaska			
U.S. ARMY CORPS OF ENGINEERS DATE: 12/18/2012 REVIEWER: Ed Bave, Cor PHONE: 402-697-2634		DATE: 12/18/2012 REVIEWER: Ed Bave, Compliance (EMCX PHONE: 402-697-2634	Action taken on c	comment by:		
Item No.	Drawing Sheet No., Spec. Para.		COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
	Comment, Appendix D	excessive reassemt standard ARAR. renovatio appropri- demolitio 400 series the provi- discharg MCLs is ARARs expected alternativ listing ar regulatio permittir and off-s	e amount and needs to be substantially reevaluated and oled. As examples, ACGIH is a worker protection (not promulgated) and does not meet the definition of ar The NESHAP for asbestos is for demolition and on and would not be applicable or relevant and ate for remediation activities unless there is some sort of on. The 40 CFR 301 – 307 references are invalid (likely es) and should all be eliminated. For on-site treatment, isions in 40 CFR 445 might be relevant to on-site es. Generically referencing non-enforceable secondary incorrect. This list should be boiled down to a listing of that meet the definition on an ARAR and are reasonably as potentially coming into play during the FS wes evaluation. As this list stands now, we are potentially in inordinate amount of Environmental Laws (and ons) with no basis. Anything listed associated with a should be evaluated for substantive requirements only the management items listed should be removed.	,		
		End	l of Comments			

REVI	EW		PROJECT: Umiat Landfill	- 12-1	I		_
U.S. ARMY CORPS OF ENGINEERS DOCCOM REVIEWEN PHONE: (90		DOCUMENT: Interim Final Rem DATE: 11/28/2012 REVIEWER: Susan Flora, BLM PHONE: (907) 474-2303	Action taken on comment by: , BLM			<u>a</u>	
Item No.	Drawing Sheet No., Spec. Para.		COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
1.	General	Thank you for the opportunity to comment on the draft final RI for the Umiat Landfill. Overall, the document is an excellent summary/compilation of past site characterization data for the site, but does not delve into remedial issues. Missing from the document is any result of the circa 1997 cap experiment where gravel was compacted into a square-topped pyramid with one or two monitoring wells. What were the thermistor results? The pyramid was disassembled by ACOE contractor Jacobs Engineering in 2001 or 2002 when additional gravel was needed for the soil burning operation on the main camp pad. Specific text review comments follow:			We have not found documentation of results of E&E's permafrost cap pilot study. We will add a sentence to that effect to the paragraph, and add the information you provided on the decommissioning of the cap.		
2.	Page vii, Exec. Sum., para. 2	Last sentence is inaccurate. The northern portion of the landfill is within the ADOT&PF airport property, and thus is correctly identified as existing on State of Alaska lands. The southern portion of the landfill, however, exists on mixed ownership: the gravel only portions of the landfill are annually a channel of the Colville River, which is designated as navigable by the State at this location. Thus, the State of Alaska (DNR) would be the landowner. The higher elevation, vegetated portions of the landfill (above the mean high water mark) would be part of the National Petroleum Reserve- Alaska, and thus, federal land.			Acknowledged. We recognize the nature of land ownership and management at the former Umiat AFS, landfill, surrounding area, and the Colville River is complex. It is beyond the scope of this RI to present a detailed discussion of the issues raised in the comment. We will delete the last sentence regarding the landfill land ownership status.		
3.	General	The report lacks a map depicting land ownership or land survey. Land ownership is a major issue for this site. Since multiple land owners are mentioned in the map, including the Arctic Slope Regional Corporation, a map depicting land ownership and navigable vs non-navigable Colville River designations would greatly advance understanding of these complex issues.			Acknowledged (see also our response to Comment 2).		
4.	Page 7, Section 2.2,	The last property	2 sentences are incorrect. In 1967, the Umiat a (including approximately 115 acres of gravel)	irfield pads		See also Lisa Geist (USACE) Comment 6; we have re-written Section 2.2 for clarity.	

REVI	EW		PROJECT: Umiat I	andfill	.		
U.S. A ENGI	U.S. ARMY CORPS OF ENGINEERS		DOCUMENT: Interim Final Remedial Investigation Report - Oct 2012 Location: Umlat, Alask DATE: 11/28/2012 Action taken on comment by: REVIEWER: Susan Flora, BLM PHONE: (907) 474-2303			laska	
Item No.	Drawing Sheet No., Spec. Para.		COMMENTS	J.	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
	para. 2	and airst State of were the were tran result of Producti Petroleu	trip) were conveyed from federa Alaska. The lands surrounding Naval Petroleum Reserve #4. In Insferred to the U.S. Department Public Law 94-258, the Naval H ion Act of 1976. (Note: the draft Im Reserve Act" which is incorre	l ownership to the the airport property n 1977 these lands of Interior (DOI) as a Petroleum Reserves refers to the "Naval ect).			
5.	Page 7, Section 2.2, para. 3	The first the airfic and airst	t sentence is not accurate in that eld which includes 115 acres of trip.	the ADOT&PF owns gravel pads, roads,		See response to comment 4.	
6.	Page 7, Section 2.2, para. 3	The seco State lan airfield. ownersh	ond sentence is incorrect. BLM I nds and therefore has no manage Only the State (specifically AD ip management here.	nas no jurisdiction on ment of the Umiat OT&PF) has		See response to comment 4.	
7.	Pages 7 and 8, Section 2.2, para. 3	The third designat Upriver as part o rivers.	d sentence is inaccurate. The Co ed as navigable from the Umiat of Umiat is non-navigable and i of the NPR-A. The State owns th	lville River is area to the mouth. s managed by BLM ne beds of navigable		See response to comment 4.	
8.	Page 8, Section 2.2, top para., third full sentence	Note tha River, ac	at the ASRC owns the lands to the cross from Umiat.	e east of the Colville		See response to comment 4.	
		End	l of Comments				

REVIEWPROJECT: Umiat LandfillCOMMENTSDOCUMENT: Interim Final Remedial 1		Investigation Repo	ort - Oct 2012 – Location: Umiat. Alaska	1	
U.S. A ENGI	U.S. ARMY CORPS OF ENGINEERS DATE: 11/26/2012 REVIEWER: Tamar Stephens, ADEC PHONE: (907) 451-2131		Action taken on comment by:		
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)
1.	General	This report compiles and evaluates information from multiple environmental and geophysical investigations that have been performed at the Umiat landfill, evaluates risks posed to human health and the environment, and recommends that the U.S. Army Corps of Engineers should implement short-term remedies to prevent further erosion and contaminant migration due to flooding of the landfill, and should assess and implement long-term measures to eliminate the potential for release of contaminants. Our review of this second draft report finds that the revisions requested in our comments on the first draft report have been adequately incorporated into the second draft report. We have the following comments on the second draft report.		Acknowledged.	
2.	Page 68, Section 5.1	The third paragraph of this section (first full paragraph on page 68) says that analytic results were compared to the Method Two soil cleanup levels; it does not say they were compared to 1/10 of the cleanup levels. This paragraph needs to be consistent with section 5.4, which does a good job of explaining the determination of cumulative risk. It is confusing to have one section say contaminants were compared to the Method Two soil cleanup levels, and another say that they were screened against one-tenth of the Method Two soil cleanup level. The fifth paragraph in Section 4.1.8 also refers to using the Method Two soil cleanup levels as a screening tool, but does not clarify that screening is actually performed by comparison to one-tenth of the cleanup levels. Please revise these sections for consistency with Section 5.4.		Analytical results were compared to both the Method Two soil cleanup levels to identify regulatory exceedances, as well as 1/10 th human- health-based cleanup levels (risk-based screening levels) to identify contributors to cumulative risk. We will clarify in the text by adding the following sentence to the noted paragraph: "Analytical results were also screened for potential contributions to cumulative risk by comparing the highest result to one-tenth the relevant human-health based cleanup level, or in the case of fish-tissue results, the calculated risk- based screening level (see Section 5.4)."	
3.	Page 71,	The partial paragraph at the top of the page refers to the Method Two Table C groundwater cleanup levels. Please		We will delete the words "Method Two" from	

REVI COM	EW MENTS	PROJECT: Umiat Landfill DOCUMENT: Interim Final Remedia	l Investigation Repo	ort - Oct 2012 Location: Umiat, Alaska	à	
U.S. ARMY CORPS OF ENGINEERS		S OF DATE: 11/26/2012 REVIEWER: Tamar Stephens, ADEC PHONE: (907) 451-2131	Action taken on comment by:			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
	Section 5.4 delete the words "Method Two" from this paragraph. The Table C groundwater cleanup levels are not part of Method Two, and apply regardless which soil cleanup method is used at a site. "Method Two" is used in the regulations only for designation of one of the methods for determining soil cleanup levels.		d	this paragraph.		
		End of comments				

REVI COM	REVIEWPROJECT:Umiat LandfillCOMMENTSDOCUMENT:Interim Final Remedial Investigation Report - Oct 2012Location:Umiat, Alaska						
U.S. A ENGI	RMY CORP NEERS	S OF DATE: 11/26/2012 and 1/7/2013 REVIEWER: Lisa Geist PHONE: 753-5742	Acti	Action taken on comment by:			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
1.	Executive Summary, 2 nd para.	Add "approximate" before 8-acre. Is it appropriate to ref a Figure which shows the landownership distinction for t southern versus northern portion of the landfill?	erence he		We will add "approximate." We will reference Figure 2-1, which shows land ownership at the landfill.		
2.	Executive Summary, p. viii	Please be more specific regarding the two studies that sug maximum burial depth or about 20 feet. The most recent GeoTek Alaska report interprets the depth at ranging from 17 feet.	ggest a n 8 to		We will change the text to read "Two studies (Ecology & Environment in 1994 and GeoTek in 2011) suggest burial depths ranging from approximately 8 feet to 18 feet bgs; the USGS (in 2005) and anecdotal evidence from past site users suggest burial depths of 40 feet or more."		
3.	Page 1	Spell out NPRA on 1 st use. Delete sentence "The State o Alaska owns 115 acres of the former station." This is ou context here, otherwise need to include other landowner s as BLM.	f t of such		We will define "NPRA," and will delete the sentence as requested.		
4.	Page 1	The scope actually specifies submitted of draft, interim fi and final versions of the RI report. Please clarify that the will also be submitted in draft, interim final, and final ver Please clarify the draft RI was submitted to USACE and for review and comment.	nal, FS sions. ADEC		Acknowledged. We will add text to state the FS will be submitted in draft, interim final, and final versions. We will also add text to note ADEC reviewed and commented on the draft RI. We will add another reference in the Final RI to identify which agencies reviewed this interim final RI.		
5.	Page 2	Please clarify that the RI report describes contamination associated with the landfill and discusses the risks to hun health and the environment. I don't think the contaminat fish is necessarily related to past military uses. Also, was ecological risk evaluated from at least a screening Sugge text: "This RI report describes the nature and extent of chemical contamination in soil, groundwater, surface w	nan ion in sn't ested ater,		Acknowledged. We will make the suggested changes.		

REVIEW COMMENTS			PROJECT: Umiat Landfill DOCUMENT: Interim Final Remedial Investigation Report - Oct 2012 Location: Umiat, Alaska						
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		sedimen risks to contami contami	nt, and fish due to past human health and the nation remaining at th nation remaining at th	military uses, and disc environment posed by a landfill. from exposu te site.	usses re to				
6.	Page 7, Section 2.2	Suggest of the U and mixe	reviewing some good miat area. As written, es sources of informat	summaries online for th this section is a bit disjo ion.	ne history Dinted		Acknowledged. We wrote this section using information from various sources (mainly previous Umiat environmental reports). We will re-write this section for improved clarity.		
7.	Page 7, Section 2.2	Please d 22.8 mil	elete "airstrip" from 1 lion acres before Nava	st sentence, and insert pa 1 Petroleum Reservation	rt of the n.		Acknowledged. See our response to Comment 6.		
8.	Page 8, 1 st para.	Please re overland	evise text: "The AFS (l transport in winter."	Jmiat area is also access	sible by		Acknowledged. See our response to Comment 6.		
9.	Page 8, 2 nd para.	I don't the operates	hink it's entirely accur the public airstrip, fue	ate to say the State of A el tank and vehicle shop	laska		Acknowledged. See our response to Comment 6.		
10.	Page 8, 3 rd para.	Again, I USGS a facilities in recen	don't think it's neces and ADFG have both t s. While the ADOT& t years, for their opera	sarily accurate to say th heir own housing and c PF has leased UMIAQ ations is perhaps the wr	ne BLM, lining 's camp ong term.		Acknowledged. See our response to Comment 6.		
11.	Page 8, 4 th para.	Please d	lelete the 1 st two sente	nces.			Acknowledged. See our response to Comment 6.		
12.	Page 8, 5 th para.	Please n more ap be consi undevel	nove the text about ele propriate section. Als idered developed or an oped.	evation of the gravel pa so, I disagree the landfi n exception for being	d to a ll would		Acknowledged. See our response to Comment 6.		

REVI COMI	EW MENTS		PROJECT: Umiat Landfill DOCUMENT: Interim Final Rem	edial	Investigation Repo	ort - Oct 2012 Location: Umiat, Alaska	L
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13.	Page 10, Section 2.4	Regarding the aerial photos in Appendix B - Why is the general landfill area not pointed out with at least an arrow or other indicator (polygon) on the zoomed-in aerial photos?				We will identify the landfill area on the Appendix aerial photographs.	
14.	Page 11, Section 2.5.1.4	The first paragraph describes the site based on a 1997 reference. However, it seems we have more current information on the Colville River hydrology presented in the USACE Hydrologic Analysis Report, based on USGS river gage information, which then appears later in this section.				We will retain the more recent hydrologic information and remove the 1997 reference.	
15.	Page 11, Section 2.5.1.4	Second paragraph mentions the seasonal stream runs across the landfill cap, since the cap is not a formal cap. Change term to surface.			We will make the recommended change.		
16.	Page 14, Section 2.6.1	Please d 1923, significa local con North Sl	elete the text "Before the creation of NPR No. 4" I don't think the primary used changed antly based on that one point in time. Also, doe mmunity agree that current use by Inupiats on the lope is "minimal"?	t in s the ne		We will revise the text as recommended. The reference to minimal use of Umiat by Inupiats, we will delete that portion of the sentence, which will now begin with "residents in the villages of Nuiqsut"	
17.	Page 14, Section 2.6.2	Shouldn seven?	't text refer to 11 nearby Navy test wells, not ju	st		Correct. We will change the text to refer to 11 wells.	
18.	Page 19, Section 3.0	ARARs. Based on recent comments on other projects, this section should be verified as consistent with FUDS interpretation of ARARs. See also Tables in Appendix D – ARARs shouldn't be an entire list of laws/statutes.		this		We will revise Section 3.0 to clarify the discussion of ARARs. We will focus on chemical-specific ARARs relevant to cleanup criteria. We will clarify that, in the context of this RI, these are proposed chemical-specific ARARs and not final cleanup levels. The discussion of location- and action-specific ARARs will be deleted; these will be included in the FS report.	

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19.	Page 29, Section 4.2.1	Last sentence – should DDT be included as a COPC identified in soil?		The AGRA report refers only to lead and PCBs as soil COPCs detected at the landfill. The DDT occurrences described in that report are attributed to other areas around Umiat. We will delete the two sentences in this section that refer to DDT as a COPC (p. 30, 1 st paragraph, 3 rd sentence; and 3 rd paragraph).	
20.	Page 32, 1 st para.	What is meant by "some unit" of the site? Please clarify.		We will replace "some" with "at least one."	
21.	Page 32, Section 4.2.3 and Page 70, Section 5.4	Verify that the use of maximum detected concentrations is appropriate method for calculating risk. I know the ADE guidance recommends using the maximum, but this is no accordance with CERCLA/EPA guidance that is based of reasonable exposure. Furthermore, ADEC guidance allows the department to approve an appropriate statistical method, in which case compliance will be based on the mean soil concentration the 95th percent upper confidence limit (UCL), under 18 AAC 75.380(c)(1).	is an CC t in n at	The ADEC risk assessor, Dr. Ted Wu, considered the use of maximum detected concentrations to be an appropriate method for calculating risk for this project. We acknowledge there are multiple methods available for evaluating site risks.	
22.	Page 32, Section 4.2.4	Delete stray ")" after consultation in first sentence.		We will correct the text.	
23.	Page 67, Section 5.0	Why are you using a HI of 0.2 for cumulative risk?		The original intent of this criterion was to eliminate compounds that were required to be included in the CRE but may have had a negligible contribution to cumulative risk. Since no compounds met this criterion, and all that	

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					were included in the CRE are considered COPCs (except arsenic, which is eliminated for other reasons) we will delete this sentence.	
24.	Section 5.0, General	Cumulative risk evaluation. Verify whether or not we sh be including chemicals of concern that may be considered background (such as arsenic). However, I believe based recent comments from Region 10 on a different project, guidance recommends that any contaminant be carried through the risk analysis and then the impact of elevated concentration of contaminants in background can be addressed in the uncertainty discussion of a risk manage section. Note that text on Page 71 states: "Arsenic and aluminum not considered COPCs as there were no statistically significant differences between project-sample and background-sample results."	nould ed on EPA i ement n are		Acknowledged. The ADEC CRE guidance cites CERCLA guidance on this subject. We consider arsenic to be a naturally occurring substance in its unaltered form and, consistent with CERCLA guidance, are not including it in the CRE. We will also revise CRE table 5-7.	
25.	Page 70-71, Section 5.3 and 5.4	In Section 5.3 the text indicates the EPA online calculate was used to calculate fish tissue screening levels at a ris management level of $1x10-6$ and a HI of 0.1. However, following page, the text in the 3 rd paragraph states fish to RBCs were calculated using the EPA calculator and a ca risk-management level of $1x10-5$ and HI of 1. Please cl	or k- on the issue ancer arify.		Risk-based <i>screening levels</i> (calculated at 1×10^{-6} and 0.1) were used to identify which results to include in the CRE, much as $1/10^{th}$ the soil or water cleanup levels are used to screen soil or water results. However, the actual calculations in the CRE are done using risk-based <i>concentrations</i> , which are calculated at 1×10^{-5} cancer risk and a HI of 1, consistent with CRE guidelines.	
26.	Page 89, Section 6.1.1	Is it really <u>known</u> what debris was buried at the Umiat la during site demolitions activities in 1973? Please clarify	andfill y with		We will replace "known to" with "may have been" to the questionable items.	

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		"may have been" or provide citation.		
27.	Pages 92-93, Section 6.1.4	 18 AAC 70 is mentioned as the surface water criteria and ARAR. However, you cannot apply a 24 hour average criteria for DDT or PCBs to a discrete sample result, even if results were available. Also, the cited value for PCBs is not readily attainable by standard laboratory methods. I disagree based on Section 6.4.3 this should be considered a data gap for the site. Also, look into Lead and Aluminum assumptions – lead criteria are based on 1-hr avg and 4-day avg, dissolved. Where is discussion regarding aluminum background concentrations/statistical evaluation for surface water? 	Time-weighted average concentrations of DDT and PCBs can be quantitated below the WQS using semi-permeable membrane devices, though their use at arctic sites has yet to be thoroughly tested. Filling the data gap is not worthwhile, however, as it would not significantly affect selection of site remedies. We will delete the reference to DDT as a data gap in Section 6.1.5 (2 nd paragraph, 3 rd sentence). We will add a section (Section 5.3) to specifically discuss statistical comparison of background data, including aluminum in surface water.	
28.	Page 93, Section 6.1.5	Verify groundwater comparison to surface water ARARs, TBCs, and RBSLs! Need to clarify what is appropriate as an ARAR at this point in the investigation. I disagree we really have a data gap for PCBs in groundwater, based on reporting limits for PCBs being above "ARARs". The cited level is practically unattainable in water samples.	Acknowledged. We will delete references to PCBs as a data gap in Section 6.1.5 (3 rd paragraph, last part of 1 st sentence and all of 2 nd sentence).	
29.	Page 97, 4 th para.	The statement: "the individual exceedance of ARARs indicates an unacceptable level of risk for each COPC individually." - does not appear consistent with CERCLA risk guidance which recommends evaluation based on a reasonable maximum exposure point concentration.	We will revise the statement to read "These two contaminants are considered COPCs."	
30.	Page 98, Section 6.4.2	I disagree that further investigation to define the depth of debris is warranted, unless you are implying actually digging	We will remove the recommendation for further investigation.	

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	 test pits or some sort of limited removal action. Our geophysical data will always be conflicting because we believe one of the geophysical surveys is wrong. <i>Updated comment 1/7/2013:</i> Please delete the sentence "Further investigation to define the depth of debris would be beneficial for the purpose of reducing uncertainty in the remedial alternative evaluations and cost estimations to be conducted in the FS." Update text with: Conflicting historical information exists regarding the depth of buried debris. In 2011, USACE conducted a geophysical survey to resolve the depth discrepancies between two previous surveys (1994, 2006) and verify the lateral extent of debris. The 2011 survey concluded the bottom depth of metal debris ranged from 8 to 17 feet and will be utilized as the basis for future volume estimates. Please provide a reference for "…and interview statements made by a contractor involved in the 1973 site demolition and burial suggest a maximum burial depth of about 40 feet bgs." If a reference is not available, please strike this statement. 			We will make the recommended changes to the text. The 1997 AGRA ESA; F10AK024203_01.09_0003 is the basis for this reference. However, we will strike this statement and replace it with the recommended change described above.					
31.	Page 99	You stat sufficien the ng/L Section constitut	te that "Standard analytical techniques are not ntly sensitive to detect or quantify these analyte crange." However, this contradicts earlier text 6.1.5 where you say the elevated reporting limit te a data gap for the groundwater and surface w	s in in ts vater.		See response to comment 27. These levels are achievable but not necessarily practical, and filling this data gap does not significantly affect the selection of site remedies.			
32.	Page 99, last para.	Which a last para entire pa	analyte are you referring to in the first sentence agraph – DDT or PCBs? Please clarify, since t aragraph seems to mix both together.	of the his		This sentence was referring to DDT; we will clarify by revising to: "Elevated PQLs prevent delineation of DDT in the seasonal stream, but they are less significant because DDT has been			

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		I agree with the overall conclusion that confirmation of in water is not warranted.	PCBs		identified above cleanup levels in surface-water and groundwater. Due to the elevated PQLs for PCBs in surface water and groundwater, we cannot determine if PCBs are present above the most stringent water quality standard."		
33.	Page 100	I disagree that we can definitively conclude contaminants have migrated from the landfill to fish tissue.			We agree with this comment; no direct evidence exists to prove the connection. We will delete "fish tissue" from this bullet item.		
34.	Appendix D	Please remove references to location-specific and action specific ARARs. These types of ARARs should be eval in the Feasibility Study, once potential alternatives and actions are identified. The chemical-specific ARARs sh only include those that are relevant to screening for COI	n- luated nould PCs.		Acknowledged. We will remove references to location- and action-specific ARARs.		
35.	Appendix D	In order to be considered an ARAR, the requirements m related to a federal or state environmental law, be a clea standard or other requirement that specifically addresses CERCLA hazardous substance or remedial action, and i be substantive rather than administrative/procedural, and applicable to the project or site (not a general requireme any actions).	nust be nup s a it must d ent for		Acknowledged. We will revise the ARAR tables.		
36.	References	Please correct the FRMD# for E&E, 1996. <i>Historical Si</i> Uses Technical Memorandum, F10AK024303_01.06_00	<i>ite</i> 001_p		We will correct the FRMD number.		
		End of Comments					

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U.S. ARMY CORPS OF ENGINEERSDATE: 11/20/2012 REVIEWER: Jeremy Craner PHONE: 753-2628Action t		on taken on comment by:					
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1.	General	The report is structurally well organized and easy to fol Discussions of risk, media contamination, and final discussions/conclusions/recommendations were also go	low. od.		Acknowledged.		
2.	General	Scope of Work refers to this version as the Interim Fina Report.	1 RI		Acknowledged. We will refer to this document as the Interim Final RI Report.		
3.	General	Add FRMD/ARIMS numbers on title page.			Acknowledged. We will make the suggested change.		
4.	Page iv	Table F-1a is listed twice, I believe the second one shou "Figure 1-b."	ıld be		Table of Contents and Appendix F cover page will be revised to correctly represent table titles, as follows (note that "ARAR" has been replaced with "PCL":		
					Table F-1a Summary of PCL and TBCConcentrations for Soil and Sediment		
					Table F-1b Summary of PCL and TBC Concentrations for Surface Water and Groundwater		
					Table F-1c Summary of Risk-Based Screening Levels and Risk-Based Concentrations for Fish Tissue		
					Also, table headers are inconsistently shaded. This will be fixed for final.		
5.	Page vii, 4 th paragraph	Second sentence lists all COPCs. One COPC listed is F including associated specific Aroclors. ADEC Method	PCBs, Two		Executive summary text: "polychlorinated biphenyls (PCBs; specifically Aroclor 1254,		

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		Cleanup Level is 1 mg/kg for total PCBs. I believe that PCBs" should be listed as one COPC. Please clarify throughout the rest of the report.	"total		Aroclor 1260, and Aroclor 1016/1242)" will be revised to "total polychlorinated biphenyls (PCBs; including Aroclor 1254)" and similarly clarified throughout the RI.			
6.	Page viii	Last paragraph: For clarification, please mention that S & Wilson, Inc. will be preparing a FS based on past wor conclusions determined in the Interim Final RI.	hannon 'k and		Acknowledged. We will make the suggested change.			
7.	Page 2, Section 1.1	First word of bullet list items should be capitalized, plea capitalize all first words (also capitalized in Section 6.5) bullet lists throughout the rest of the report for consisten Last paragraph, first sentence states: "This RI report det the nature and extent of chemical contamination in soil, groundwater, surface water, sediment, and fish due to pa military uses," There has not been just past military u the landfill. Please list other users and clarify.	ise in icy. scribes ast se of		Acknowledged. We will make this change. Acknowledged.			
8.	Page 7, Section 2.0	"Former Umiat AFS" and "former Umiat AFS" are both used on this page, please be consistent." Suggest taking another look at Section 2.0 as a whole. It is lacking in overall continuity and is at times difficult to follow along. Suggest making an effort to couple topics/information from the various references. Make sure a person who has never been to the site and has no background knowledge can follow along with the text/figures and gain pertinent site info.			Acknowledged. We will use consistent terminology. We have rewritten Section 2.2 for clarity.			
9.	Page 7, Section 2.1	Please add detail to last sentence: "The nearest commun Nuiqsut, which is located downstream along the Colville 65 miles to the northeast of the station." How many rive	nity is e River er miles		We will add the river miles to Nuiqsut to the sentence.			

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		is Nuiqsut located downstream from the Umiat landfi Would be good to add this info as well.	11?					
10.	Page 7, Section 2.2	First paragraph, 6 th sentence states: "6 of the 11 wells were within the boundary and five wells were outside the U.S. Air Force (USAF) Station." What boundary is being discussed? The next sentence mentions the Umiat AFS and references Figure 2-1. Please clarify and clearly label these features on Figure 2-1.		,	We have rewritten Section 2.2 for clarity.			
11.	Page 8, 3 rd paragraph	"UIC UMIAQ" is mentioned for the first time. Please define acronym UIC.			We will define the acronym UIC (Ukpeagvik Iñupiat Corporation).			
12.	Page 10, Section 2.5	All of a sudden start to indent the first paragraph of subsection. Please be consistent throughout report. no indentation of any paragraph within the report.	each Suggest		We will modify the formatting to be consistent within the report.			
13.	Page 11, 2 nd paragraph	Last sentence states: "An oil seep is located in the Colville River riverbed upstream of Umiat Mountain, and downstream of the former Umiat AFS Main Gravel Pad, airstrip, and landfill." This is confusing since Umiat Mtn is located immediately downstream from Umiat AFS. Please clarifysuggest adding Umiat Mtn label to a figure for reference. Label figures with names as mentioned in text.			We will identify Umiat Mountain and the oil seep location on Figure			
14.	Page 11, Section 2.5.1.4	Title is named "Surface-Water Hydrology", then in sentence it is stated "Surface water occurs" Pleas consistent with the hyphen.	he first e be		We do not hyphenate "surface water" when it is used as a stand-alone term. However, when part of a two-word modifier, we will hyphenate those words.			
15.	Page 11, last paragraph	First sentence: Add info and reword to: "The landf located on a gravelly inside meander within the activ	ll is ve		We will make the requested changes.			

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U.S. AL	U.S. ARMY CORPS OF ENGINEERSDATE: 11/20/2012 REVIEWER: Jeremy Craner PHONE: 753-2628Activ			on taken on comment by:				
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		floodpla	ain of the Colville River."					
		Remaining paragraph: Difficult to follow. Since this is the "Surface-Water Hydrology" section, please mention the two local Colville River tributary streams named Seabee Creek and Bearpaw Creek, reference a figure with these features, and also label the no-name seasonal stream mentioned on a figure and reference accordingly.						
16.	Page 12, Section 2.5.1.5	First paragraph: It is noted that three types of groundwater exists in the Umiat area: suprapermafrost, thaw bulbs beneath lakes and rivers, and deep subpermafrost groundwater beneath permafrost. Second paragraph: The first few sentences basically re-states the same thing as the first paragraph, and then defines suprapermafrost (not defined in first paragraph). Please couple these paragraphs/info together so that is makes sense. This is very important site specific hydrogeology directly related to the Umiat landfill site			We will revise Section 2.5.1.5 for clarity.			
17.	Page 12, Section 2.5.1.5	Last par rework. area gro potable-	ragraph, last sentence does not make sense. Ple Currently states: "No evidence was found the bundwater has been investigated for the purpose -water supplies."	ase Umiat of		We will reword the sentence to state, "No evidence was found that groundwater in the Umiat area has been investigated as a potential source of drinking water."		
18.	Figures 1-2 and 2-1	Please 1 they are versa, in features discusse Referen	abel these figures with ALL the specific feature e named in the text so things are consistent. Vic in the text, please be consistent with names of sin b. At times it is unclear what exactly is being ed and where important features are located. Ince these introductory figures accordingly so the	s as e e reader		We will make the requested changes.		

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Item No.	Drawing Sheet No., Spec. Para.		COMMENTS		REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	

		can orient oneself with the site.		
19.	Page 23, Section 4.1.3	"Surface-water" and "surfacewater"; "sub-surface" and "subsurface"	See also response to Comment 14. We will ensure consistency throughout the report.	
20.	Page 24, Section 4.1.4	First mention of acronym "AGRA", please define.	We don't believe this is an acronym or abbreviation. AGRA is the shortened form of AGRA Earth & Environmental.	
21.	Page 35, Sections 4.3.1, 4.3.2, and 4.3.3	Figures 4-9, 4-10, and 4-11 are referenced in three separate sections on this page. These references are all incorrect. Please re-reference to Figures 4-10, 4-11, and 4-12, respectively.	We will correct the references to the figures.	
22.	Page 90, Section 6.1.2	Third paragraph: Discusses methylene chloride as a COPC. I agree, this likely a lab contaminantno other hits soil, sediment, groundwater, or surface waterit may be worthwhile to have a chemist review the laboratory data packages (if available) to see if methylene chloride was detected in any associated lab blanks, etc. May be able to rule out MC as a COPC completely.	Original laboratory reports were not available (result reported from 1994 E&E investigation). Not having direct evidence that it was lab-related contamination, additional sampling seems the best way to rule out the compound as a COPC.	
23.	Page 91, First paragraph	States 4,4'-DDD and 4,4'-DDT are COPCs in soil. Source likely widespread spraying of DDT for insect control (non- point source). Are there any other sample results from other areas around Umiat that indicate similar concentrations? What are the landfill cleanup implications for this contaminant? If cleanup occurs, how will you know when "cleanup levels" have been achieved if source is non-point? Is it truly a landfill COPC or should it be considered an area wide COPC?	Reference documents we reviewed for this RI suggest pesticides were used throughout the Umiat site: 1996 RI background soil samples: "4,4'-DDE; and 4,4'-DDT were detected well below the regulatory guidance or screening levels. Chlorinated pesticides were sprayed as insect control over much of Umiat, and low concentrations of DDT and DDD in soil are	

REVI COM	EVIEWPROJECT:Umiat LandfillOMMENTSDOCUMENT:Interim Final Remedial Investigation Report - Oct 2012Location:Umiat, Alaska							
U.S. ARMY CORPS OF ENGINEERS DATE: 11/20/2012 REVIEWER: Jeremy Craner PHONE: 753-2628		Action taken on comment by:						
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	COMMENTS		CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)		
					common." Sediment samples: "Low levels of RRO and DDT are considered background conditions." And: "chlorinated pesticide (DDT and DDD) contamination of surface soil, subsurface soil, and groundwater across Unit B is the result of aerial and ground spraying of DDT for mosquito control in the late 1940s, and possibly later (E & E 1996b) Contamination was detected across fairly broad areas, which is likely a result of aerial spraying."			
24.	Page 91, Third paragraph	opears arsenic is within range of background ncentrations. ourth sentence: States "Based on our statistical comparison project sample results to background results, and the tural abundance of this element in arctic soils, it is not nsidered a COPC at the Umiat AFS landfill." Where are e statistical analysis results? There is no discussion in this port. Please cite the statistical comparison made in the text d include in an appendix the raw data, statistical analysis, id a synopsis of your results. Need to justify the conclusion at arsenic is not a COPC.			We will add a section (Section 5.3) specifically discussing the statistical comparison, and an appendix (Appendix G) presenting the background data set and the statistical output files.			
25.	Pages 92-93, Section 6.1.4	18 AAC 70 is mentioned as the screening tool used for surface water. Is 18 AAC 70 the most stringent when compared to other regulations? Please clarify in this se	ection.		18 AAC 70 levels may be more stringent than 18 AAC 75 on an analyte-specific basis. The comparison basis is specified in Table F-1b, ARAR source column.			
26.	Page 93, Section 6.1.5	First paragraph: States that groundwater is being comp surface water screening criteria based on its hyporheic connection with surface water. This is OK, then result discussed and mentioned to either be above or below	oared to s are		Same as for surface water; see response to comment 25, above.			

REVI	REVIEW PROJECT: Uniat Landfill COMMENTS DOCUMENTS Interim Final Remedial Investigation Report Oct 2012 Locations Uniot Alaska								
U.S. ARMY CORPS OF ENGINEERS PH		S OF DATE: 11/ REVIEWE PHONE: 7:	DOCUMENT: Interim Final Remedial DATE: 11/20/2012 Actic REVIEWER: Jeremy Craner PHONE: 753-2628			at Investigation Report - Oct 2012 Location: Umlat, Alaska			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS			REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)		
27.	 ARARs/RBSLs. So, concentrations are being compared to 18 AAC 70are these the most stringent levels? Then, for the rest of the section, the remaining groundwater analytical results are compared to 18 AAC 75.345 (Table C GW Cleanup Levels). Why the flip-flop? Are these levels most conservative? Overall, it is unclear what set of regulations the groundwater results are being compared to. Please clarify. Page 94, Section 6.1.6 First paragraph, last sentence states: "Aroclor 1260 and Aroclor 1016/1242 were not detected in soil, sediment, surface water, or groundwater at the Umiat landfill." But, as mentioned above, these Aroclors were detected in fish tissue. This data suggests that the local fish are being impacted by contaminant sources other than those identified at the Umiat landfill. This is important to state and elaborate on. At what river/stream locations were these fish samples collected? Can this contaminant signature be linked to a global atmospheric source? I like the detailed summary in the following paragraph for 4,4'-DDD, 4,4'-DDE, and 4,4'-DDTplease do 				We will add that the fish may be impacted by contaminant sources other than the landfill. However, there's no evidence for an area-wide source of PCBs, as there is for pesticides. We will note the sample locations for the fish, and emphasize that the fish could only be present in the landfill stream a few months of the year (when surface water is present).				
28.	Page 97	Fourth paragraph, seco detected above the AD mg/L in surface-water level?	nd sentence states: "Lead w EC Water Quality Criteria of sample." Was this the most	as also f 0.001 stringent		Yes. The 18 AAC 70 water-quality standard was used, with an assumed hardness of 50 mg/L as this standard is hardness-dependent. The Table C cleanup level is 0.015 mg/L, substantially higher than the WQS.			
29.	Page 97, Last paragraph	I agree. The heterogen likely collected from "I highest of these sample will heavily bias risk of	eous nature of the landfill, the pockets" of contamination, a being used to determine own the high side.	ne samples nd the verall risk		Acknowledged.			

REVIEWPROJECT: Umiat LandfillCOMMENTSDOCUMENT: Interim Final Remedial Investigation Report - Oct 2012Location: Umiat, Alaska					a	
U.S. A ENGI	RMY CORP NEERS	S OF DATE: 11/20/2012 REVIEWER: Jeremy Craner PHONE: 753-2628	Action taken on comment by:			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS	REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
30.	Page 100, Section 6.5	First bullet: Lists all COPCs, including "PCBs, specific Aroclor 1254, Aroclor 1260, and Aroclor 1016/1242;" Shouldn't this be just "total PCBs" since this is what the cleanup levels are set for? Also, I would argue that sinc Aroclor 1260 and Aroclor 1016/1242 have never been detected in soil, sediment, surface water, or groundwate the site that these are not site COPCs. Shouldn't base a conclusions on purely transient fish data. Methylene ch is also suspicious (as mentioned in Comment 22) and m a lab contaminant. Would any of the above mentioned modifications alter t final risk calculations?	cally e ce r at ll lloride lay be the	See comments 5 and 27. Considering total PCBs instead of individual Aroclors in the CRE would result in lower cumulative risk numbers, though only slightly. Methylene chloride, while above the MTG cleanup level, was below the risk-based screening level of 24 mg/kg, and was therefore not included in the CRE.		
		End of Comments				

REVIEW COMMENTS U.S. ARMY CORPS ENGINEERS		PROJECT: Umiat Landfill DOCUMENT: Interim Final Remedial Investigation Report - Oct 2012 Location: Umiat, Alaska						
		S OF	DATE: 11/02/2012 REVIEWER: Craig Scola PHONE: 753-5769	Acti	Action taken on comment by:			
Item No.	Drawing Sheet No., Spec. Para.	COMMENTS			REVIEW CONFERENCE A - comment accepted W - comment withdrawn (if neither, explain)	CONTRACTOR RESPONSE	USAED/ADEC RESPONSE ACCEPTANCE (A-AGREE) (D-DISAGREE)	
1.	General	Scope of Work refers to this version as the Interim Final F Report.				Acknowledged.		
2.	MED Doc Review Check list	Seems you can check off 1.1.1, 1.1.2, 1.1.3, 1.1.4 and 1.1 Try to include direction in photos taken by S&W.		1.1.5.		Acknowledged. We will include a photo log, note the photo direction in captions, and check the appropriate boxes on the MED document review checklist.		
3.	Lisa Geist's Comment #5	Blank pages on hard copies don't have "(This page intentionally blank)" printed on them.				We will add "(This page intentionally blank)" to the appropriate pages.		
4.	Lisa Geist's Comment #37	How does one determine which sampling locations contain results exceeding respective Cleanup levels on any of the figures?				We will create a figure in Section 6 similar to Figure 4-9 showing samples that exceed PCLs.		
5.	PDF Report Document properties	Remember to add FRMD number in front of title for final version of RI submittal.		final		Acknowledged. We will add the FRMD number to the document properties.		
6.	App F - Summaries	Many of the cell. tables?	f the tables have a green tab in the upper left c What do they represent? Are they needed fo ID in Notes if necessary.	orner of r these		The green tabs are an indication of numbers formatted as text. They are kept this way to preserve significant figures. This only shows in the raw excel files and is not worth noting in the notes on the tables of the hard copy report.		
		End	l of Comments					

APPENDIX B

AERIAL PHOTOGRAPHS

PHOTO LOG

Umiat Landfill Area – Aerial Photographs

Page

B-1	Photo 1	August 1, 1974
B-2	Photo 2	August 1, 1974
B-3	Photo 3	August 1, 1976
B- 4	Photo 4	August 1, 1976
B-5	Photo 5	August 30, 2001
B-6	Photo 6	August 30, 2001



Photo 1: August 1, 1974.



Photo 2: Landfill area. August 1, 1974.



Photo 3: August 1, 1976.



Photo 4: Landfill area. August 1, 1976.



Photo 5: August 30, 2001.



Photo 6: Landfill area. August 30, 2001.

APPENDIX C

SELECTED PHOTOGRAPHS

PHOTO LOG

Selected Site Photographs

Page

C-1	Photo 1 Photo 2	Debris eroding from landfill area. June 9, 2010 (BLM) Drums and pipe eroded from landfill area. June 9, 2010 (BLM)
C-2	Photo 3 Photo 4	Equipment tracks, cable and other debris from landfill area. June 9, 2010 (BLM) Drill bits inside drum eroded from landfill area. June 10, 2010 (BLM)
C-3	Photo 5	Upstream end of the Slough and the Colville River interface. June 15, 2012 (2010 USACE Trip Report)
	Photo 6	Flow over landfill, facing North. May 30, 2011 (BLM)
C-4	Photo 7 Photo 8	Crushed drums in seasonal stream at landfill. June 2, 2011 (BLM) Drums in seasonal stream at landfill area. June 2, 2011 (BLM)
C-5	Photo 9 Photo 10	Debris and new erosion at landfill area. June 2, 2011 (BLM) Debris and new erosion June 2, 2011 (BLM)
C-6	Photo 11 Photo 12	Debris eroded from landfill area. June 2, 2011 (BLM) Tracked vehicle eroding from landfill area. June 2, 2011 (BLM
C-7	Photo 13	Example of debris eroding out of landfill area near Cell 6. July 28, 2011 (2011 USACE Trip Report)
	Photo 14	Exposed debris at landfill. July 28, 2011 (2011 USACE Trip Report)
C-8	Photo 15 Photo 16	Exposed drums at landfill. July 28, 2011 (2011 USACE Trip Report) Debris at landfill. July 28, 2011 (2011 USACE Trip Report)
C-9	Photo 17 Photo 18	Debris at landfill. July 28, 2011 (2011 USACE Trip Report) Debris at landfill (close-up). July 28, 2011 (2011 USACE Trip Report)
C-10	Photo 19	Bank erosion on Colville river upstream (West) of landfill. July 28, 2011 (Shannon & Wilson)
	Photo 20	Debris along eroding West side of landfill slough channel. July 28, 2011 (Shannon & Wilson)
C-11	Photo 21	Equipment tracks in slough channel north of access road. July 28, 2011 (Shannon & Wilson)
	Photo 22	Landfill above upstream end of landfill slough. July 28, 2011 (Shannon & Wilson)
C-12	Photo 23	Landfill with debris visible along West side of landfill slough channel (Shannon & Wilson)
	Photo 24	Landfill with erosion at left, view to North. July 28, 2011 (Shannon & Wilson)
C-13	Photo 25	Landfill area facing South. July 28, 2011 (Shannon & Wilson)
	Photo 26	Pipe at Colville River downstream of landfill. July 28, 2011(Shannon & Wilson)



Photo 1: Debris eroding from landfill area. June 9, 2010 (BLM).



Photo 2: Drums and pipe eroded from landfill area. June 9, 2010 (BLM).



Photo 3: Equipment tracks, cable, and other debris eroded from landfill area. June 9, 2010 (BLM).



Photo 4: Drill bits inside drum eroded from landfill area. June 10, 2010 (BLM).



Photo 5: Upstream end of the Slough and the Colville River interface. Note damp muddy channel on left, unvegetated mid tier, and vegetated upper bank areas. Also note bank erosion upstream of the slough bank. June 15, 2010 (2010 USACE Trip Report).



Photo 6: Flow over landfill, facing north. May 30, 2011 (BLM).


Photo 7: Crushed drums in seasonal stream at landfill. June 2, 2011 (BLM).



Photo 8: Drums in seasonal stream at landfill area. June 2, 2011 (BLM).



Photo 9: Debris and new erosion at landfill area. June 2, 2011 (BLM).



Photo 10: Debris and new erosion at landfill. Note monitoring well at right. June 2, 2011 (BLM).



Photo 11: Debris eroded from landfill area. June 2, 2011 (BLM).



Photo 12: Tracked vehicle eroding from landfill area. June 2, 2011 (BLM).



Photo 13: An example of some of the debris eroding out of the landfill near Cell 6. July 28, 2011 (2011 USACE Trip Report).



Photo 14: Exposed debris at landfill. July 28, 2011 (2011 USACE Trip Report).



Photo 15: Exposed drums at landfill. July 28, 2011 (2011 USACE Trip Report).



Photo 16: Debris at landfill. July 28, 2011 (2011 USACE Trip Report).



Photo 17: Debris at landfill. July 28, 2011 (2011 USACE Trip Report).



Photo 18: Close up of debris at landfill. July 28, 2011 (2011 USACE Trip Report).



Photo 19: Bank erosion on Colville River upstream (west) of landfill. July 28, 2011 (Shannon & Wilson).



Photo 20: Debris along eroding west side of landfill slough channel, south of access road. July 28, 2011 (Shannon & Wilson).



Photo 21: Equipment tracks in slough channel north of access road. July 28, 2011 (Shannon & Wilson).



Photo 22: Landfill above upstream end of landfill slough. July 28, 2011 (Shannon & Wilson).



Photo 23: Landfill with debris visible along west side of landfill slough channel, south of access road. July 28, 2011 (Shannon & Wilson).



Photo 24: Landfill with erosion at left, view to north. July 28, 2011 (Shannon & Wilson).



Photo 25: Landfill area facing south. July 28, 2011 (Shannon & Wilson).



Photo 26: Pipe at Colville River downstream of landfill with eroding bank at right. July 28, 2011 (Shannon & Wilson).

APPENDIX D

TABLE D-1: POTENTIAL CHEMICAL-SPECIFIC ARARS

 Table D-1

 Potential Chemical-Specific Applicable or Relevant and Appropriate Requirements

Potential ARARs	Citation or Reference	Requirements	Applicability
Alaska Water Quality Standards (AWQS) and Alaska Water Quality Criteria	18 AAC 70	Specifies the degree of degradation that may not be exceeded in a water body as a result of human action. Provides water quality criteria and limits to protect fresh and marine water bodies for such uses as drinking water, recreation and growth and propagation of fish, other aquatic life, and wildlife.	Potentially Applicable
Oil and Hazardous Substances Pollution Control Regulations	18 AAC 75.341 – 18 AAC 75.345	Regulations establishing discharge reporting, cleanup, and disposal requirements for oil and other hazardous substances. Provide cleanup standards for soil and groundwater.	Potentially Applicable

APPENDIX E

TABLE E-1: SOIL AND SEDIMENT SAMPLING AND
LABORATORY ANALYSIS SUMMARYTABLE E-2: SURFACE WATER AND GROUNDWATER SAMPLING
AND LABORATORY ANALYSIS SUMMARYTABLE E-3: FISH TISSUE SAMPLING AND LABORATORY ANALYSIS SUMMARY

Table E-1 Soil and Sediment Sampling and Laboratory Analysis Summary

		Sample Information	n																Soil/S	Sedim	ent S	ampl	e Ana	alysis								
	tion	per			ole Depth (ft. bgs)	h (feet bgs)	۵	nple	nple	nple	AK 101)	3015)	()	3100)	2)	3)	od not listed)	s M 8015)	6 Method 8260A)	scified GC/MS SIM method)	N-846 Method 8080A)	N-846 Method 8081A)	5 Method 8081)	W-846 Method 8081)	3 Method 8082)	3 Method 8270B)	Method 7060)	lethod 6010A)	6 Method 7421)	SW-846 Method 1311/7421)	Cu & Pb)	SW-846 Method 6000/7000 Series)
t	ple Loca	ple Num	×	ple Date	an Samp	ple Dept	ct Sampl	cate Sar	cate Sar	ASD Sar	/BTEX ((AK M	(AK 10	(AK M 8	(AK 102	(AK 103	H (metho	ID (Corp	(SW-84	ds-uou)	PCB (S)	PCB (S)	(SW-846	cides (S	(SW-846	(SW-846	nic (EPA	(EPA M	(SW-84	> Lead (Metals (Metals (
Even	Sam	Sam	Matri	Sam	Medi	Sam	Proje	Dupli	Tripli	MS/N	GRO	GRO	GRO	DRO	DRO	rro	TRPI	Fuel	VOC	PAH	Pest	Pest	PCB	Pesti	PCB	BNA	Arsei	Lead	Lead	TCLF	TAL	TAL
1994 E&E	BH11-1	135SL	SL	8/25/94	0	0	1					Х		Х			Х	Х	Х		Х											Х
1994 E&E 1994 E&E	BH11-1 BH11-1	136SL 137SL	SL SL	8/25/94 8/25/94	0	0		1	1			X		X X			X X	X X	X		X X											X
1994 E&E	BH11-1	138SL	SL	8/25/94	2	2	1					Х		Х			Х	Х	Х		Х											Х
1994 E&E 1994 E&E	BH11-1 BH11-2	139SL 142SL	SL SL	8/25/94 8/25/94	9 0	9 0	1				-	X		X X			X X	X X	X X		X X											X
1994 E&E	BH11-2	143SL	SL	8/25/94	2	2	1					X		X			X	Х	Х		Х											X
1994 E&E 1994 E&E	BH11-2 BH11-3	144SL 145SL	SL SL	8/25/94 8/25/94	9	9	1					X		X X			X X	X X	X X		X									-		X
1994 E&E	BH11-3	146SL	SL	8/25/94	2	2	1					X		X			X	X	X		X											X
1994 E&E 1994 F&F	BH11-3 BH11-4	147SL 148SI	SL SI	8/25/94 8/25/94	9	9	1					X		X X			X X	X	X X		X											X
1994 E&E	BH11-4	149SL	SL	8/25/94	2	2	1					X		X			X	X	X		X											X
1994 E&E	BH11-4 BH11-5	150SL	SL SI	8/25/94 8/25/94	6 0	6	1					X		X			X	X	X x		X x									-+	-	X
1994 E&E	BH11-5	152SL	SL	8/25/94	2	2	1					X		X			X	X	X		X											X
1994 E&E	BH11-5 BH11-6	153SL	SL SI	8/25/94 8/25/94	6 0	6	1	$\left - \right $				X Y		X			X	X	X		X									-+	-	X
1994 E&E	BH11-6	155SL	SL	8/25/94	2	2	1					X		X			^ X	X	X		X											X
1994 E&E	BH11-6	156SL	SL	8/25/94	2	2		1	1			X		X			X	X	X		X									-		X
1994 E&E	BH11-6	158SL	SL	8/25/94	10	10	1		1			X		^ X			X	X	^ X		^ X											X
1994 E&E 1994 E&E	(Background) (Background)	140SL 141SL	SL SL	8/25/94 8/25/94	0	0	1					<u> </u>																		-	-	X X
1996 AGRA		1639-02	SD	8/8/96	2	2	1													Х	Х						Х	Х				
1996 AGRA		1639-03 1639-06	SD SI	8/8/96	2	2	1												x	X	Х						X	X				
1996 AGRA		1639-07	SD	8/8/96	2	2	1												~	X	Х						X	X				
1996 AGRA 1996 AGRA		1639-08 1639-08(DUP)	SL SL	8/8/96 8/8/96	2	2	1	1											Х	X X							Х	Х				
1996 E&E	MW-3	96-UMT-195-SS ^α	SL	8/10/96	0	0	1				Х				Х	Х			Х	~	Х					Х						Х
1996 E&E	MW-3	96-UMT-196-SB ^α 96-UMT-197-SB ^α	SL SI	8/10/96 8/10/96	4	4	1	1			X				X	X			X		X					X						X
1996 E&E	SB-44	96-UMT-199-SB	SL	8/10/96	5	5	1				X				X	X			~		X					~						
1996 E&E	SB-45	96-UMT-200-SB	SL SI	8/10/96 8/10/96	3	3	1				X				X	X			x		X					Y						×
1996 E&E	MW-4	96-UMT-202-SB	SL	8/10/96	5	5	1				X				×	×			×		X					X						X
1996 E&E	MW-6	96-UMT-203-SS ^β	SL	8/10/96	0	0	1				X				X	X			X		X					X						X
1996 E&E	MW-6	96-UMT-205-SB	SL	8/10/96	3	3	1	1			X				×	X			X		X					X				_		X
1996 E&E	MW-6	96-UMT-206-SB ^Y	SL SI	8/10/96	3	3	1				X				Y	Y					Y											
1996 E&E	SB-401	96-UMT-207-SB	SL	0/10/90	3	3					X				X	X					X											
1996 E&E	MW-5	96-UMT-208-SB	SL SI	8/10/96 8/10/96	6	6	1				X				X	X			Y		X					Y						×
1996 E&E	MW-7	96-UMT-210-SB	SL	8/10/96	6	6	1				X				X	X			X		X					X						X
1996 E&E	MW-8	96-UMT-211-SB	SL SI	8/10/96 8/11/96	3	3	1				X				X	X					Х											
1996 E&E	SB-50	96-UMT-213-SS	SL	8/10/96	0	0	1				X				~	~																
1996 E&E	SB-50	96-UMT-214-SB	SL SI	8/11/96 8/11/96	6	6	1				X				X	X			Х		Х					Х						Х
1996 E&E	LC	96-UMT-224-SD	SD	8/11/96	NA	NA	1				~				~	X			х		Х					х						х
1996 E&E	LC	96-UMT-225-SD	SD SD	8/11/96	NA	NA NA		1								X			X		X					X						X
1996 E&E	LA	96-UMT-230-SD	SD	8/11/96	NA	NA	1									X			X		X					X						X
1996 E&E 1996 E&E	LB SB-401	96-UMT-232-SD 96-UMT-401-SB ^⁰	SD SL	8/11/96 8/19/96	NA 0	NA 0	1 1	$\left - \right $				-			Х	X X			X X		X X					X X				\dashv	-	X
1997 E&E	T1R SED-1	97-UMT-001-SD	SD	8/8/97		0-0.17	1									-			-		-		Х			-				\exists		
1997 E&E 1997 E&E	T1C SED-2 T1L SED-3	97-UMT-002-SD 97-UMT-003-SD	SD SD	8/8/97 8/8/97		0-0.17	1 1					-											X X							\rightarrow	-	
1997 E&E	T1L SED-3	97-UMT-004-SD	SD	8/8/97		0-0.17		1															Х							\equiv		
1997 E&E 1997 E&E	11L SED-3 T2R SED-4	97-UMT-005-SD ^E 97-UMT-006-SD	SD SD	8/8/97 8/8/97		0-0.17 0-0.17	1		1														X X							\rightarrow		
1997 E&E	T2C SED-5	97-UMT-007-SD	SD	8/8/97		0-0.17	1																Х							4		
1997 E&E 1997 E&E	T2L SED-6 T3R SED-7	97-UMT-008-SD 97-UMT-009-SD	SD SD	8/8/97 8/8/97		0-0.17	1																X X									
1997 E&E	T3C SED-8	97-UMT-010-SD	SD	8/8/97		0-0.17	1																Х									
1997 E&E 1997 E&E	T3L SED-9 T4R SED-10	97-UMT-011-SD 97-UMT-012-SD	SD SD	8/8/97 8/8/97		0-0.17	1																X X									
1997 E&E	T4R SED-10	97-UMT-013-SD	SD	8/8/97		0-0.17		1															Х									
1997 E&E 1997 E&E	T4R SED-10 T4C SED-11	97-UMT-014-SD [*] 97-UMT-015-SD	SD	8/8/97		0-0.17	1		1														X X									
1997 E&E	T4L SED-12	97-UMT-016-SD	SD	8/8/97		0-0.17	1																Х									
1997 E&E 1997 E&E	T5C SED-13	97-UMT-017-SD 97-UMT-018-SD	SD	8/8/97		0-0.17	1													_			X					_		_	_	
1997 E&E	T5L SED-15	97-UMT-019-SD	SD	8/8/97		0-0.17	1					-											X			_			_	_		
1997 E&E 1997 E&E	T11R SED-31	97-UMT-020-SD 97-UMT-021-SD	SD SD	8/10/97		0-0.17	1	1				-			-								X X							-+	-	
1997 E&E	T11R SED-31	97-UMT-022-SD ²	SD	8/10/97		0-0.17			1														Х									
1997 E&E 1997 E&E	T10R SED-50	97-UMT-023-SD 97-UMT-024-SD	SD	8/10/97		0-0.17 0-0.17	1													_			X					_		_	_	
1997 E&E	T10C SED-29	97-UMT-025-SD	SD	8/10/97	-	0-0.17	1																X							\dashv		
1997 E&E 1997 E&E	T9R SED-30	97-UMT-026-SD 97-UMT-027-SD	SD	8/10/97	L	0-0.17	1 _1																X X							_+	_	
1997 E&E	T9C SED-26	97-UMT-028-SD	SD	8/10/97		0-0.17	1					-											X							\neg		
1997 E&E 1997 E&E	T8R SED-27	97-UMT-029-SD 97-UMT-030-SD	SD	8/10/97		0-0.17	1														_	_	X				_			_	_	
1997 E&E 1997 E&E	T8C SED-23 T8L SED-24	97-UMT-031-SD 97-UMT-032-SD	SD SD	8/10/97 8/10/97		0-0.17	1												_				X X				_	_		\neg		

Soil and Sediment Sampling and Laboratory Analysis Summary

		Sample Information	n																Soil/S	Sedim	ient S	ample	e Ana	alysis								
Event	Sample Location	Sample Number	Matrix	Sample Date	Median Sample Depth (ft. bgs)	Sample Depth (feet bgs)	Project Sample	Duplicate Sample	Triplicate Sample	MS/MSD Sample	GRO/BTEX (AK 101)	GRO (AK M 8015)	GRO (AK 101)	DRO (AK M 8100)	DRO (AK 102)	RRO (AK 103)	TRPH (method not listed)	Fuel ID (Corps M 8015)	VOC (SW-846 Method 8260A)	PAH (non-specified GC/MS SIM method)	Pest/PCB (SW-846 Method 8080A)	Pest/PCB (SW-846 Method 8081A)	PCB (SW-846 Method 8081)	Pesticides (SW-846 Method 8081)	PCB (SW-846 Method 8082)	BNA (SW-846 Method 8270B)	Arsenic (EPA Method 7060)	Lead (EPA Method 6010A)	Lead (SW-846 Method 7421)	TCLP Lead (SW-846 Method 1311/7421)	TAL Metals (Cu & Pb)	TAL Metals (SW-846 Method 6000/7000 Series)
1997 E&E	T7R SED-19	97-UMT-033-SD	SD	8/10/97		0-0.17	1																Х								<u>ا</u> ا	┣──
1997 E&E	T7C SED-20	97-UMT-034-SD	SD	8/10/97		0-0.17	1																Х								<u> </u>	
1997 E&E	T7L SED-21	97-UMT-035-SD	SD	8/10/97		0-0.17	1																Х									
1997 E&E	T7L SED-21	97-UMT-036-SD	SD	8/10/97		0-0.17		1															Х									
1997 E&E	T7L SED-21	97-UMT-037-SD ^ε	SD	8/10/97		0-0.17			1														Х									
1997 E&E	T6R SED+16	97-UMT-038-SD	SD	8/10/97		0-0.17	1																Х									
1997 E&E	T6C SED-17	97-UMT-039-SD	SD	8/10/97		0-0.17	1																Х									ĺ
1997 E&E	T6L SED-18	97-UMT-040-SD	SD	8/10/97		0-0.17	1																х								l	
1997 E&E	BIASED SED-32	97-UMT-041-SD ⁷	SD	8/10/97		0-0.17	1																X								 	
1997 F&F	BIASED SED-32	97-LIMT-042-SD	SD	8/10/97		0-0 17	<u> </u>	1								1							X									
1997 F&F	BIASED SED-32	97_LIMT_0/2 CD ⁽	SD	8/10/07	-	0-0.17			1														x									
1007 E&E		97-0MT-043-0D	80	8/10/07		0.0.17	4																									
1997 E&E	DIAGED SED-33	97-UNIT-044-SD	30	8/10/97	_	0-0.17	1																×									<u> </u>
1997 E&E	BIASED SED-34	97-UMT-045-SD	50	8/10/97	-	0-0.17	1																X									
1997 E&E	BIASED SED-35	97-UM1-046-SD ^s	SD	8/10/97		0-0.17	1																Х								<u>ا</u>	
1997 E&E	BIASED SED-36	97-UMT-047-SD'	SD	8/10/97		0-0.17	1																Х								<u>ا</u> ا	┣──
1997 E&E	BIASED SED-37	97-UMT-048-SD ⁽	SD	8/10/97		0-0.17	1																Х								<u> </u>	
1997 E&E	BIASED SED-38	97-UMT-049-SD ⁷	SD	8/10/97		0-0.17	1																Х									
1997 E&E	BIASED SED-39	97-UMT-050-SD [≀]	SD	8/10/97		0-0.17	1																Х									
1997 E&E	BIASED SED-40	97-UMT-051-SD	SD	8/10/97		0-0.17	1																Х									
1997 E&E	BIASED SED-41	97-UMT-052-SD	SD	8/10/97		0-0.17	1																Х									
1997 E&E	BIASED SED-42	97-UMT-053-SD	SD	8/10/97		0-0.17	1																Х									
1997 E&E	BIASED SED-43	97-UMT-054-SD	SD	8/11/97		0-0.17	1																Х									
1997 E&E	BIASED SED-44	97-UMT-055-SD	SD	8/11/97		0-0.17	1																Х									
1997 E&E	BIASED SED-45	97-UMT-056-SD	SD	8/11/97		0-0.17	1																Х									
1997 F&F	BIASED SED-46	97-UMT-057-SD	SD	8/11/97		0-0 17	1																X									
1997 E&E	BIASED SED-47	97-UMT-058-SD	SD	8/11/97		0-0.17	1																X								ł	ŀ
1007 E&E		07 UMT 050 SD	80	9/11/07		0.0.17	1																×									
1997 E&E	MW 21	97-0WIT-039-3D	50	8/0/07	-	0-0.17	1								v								^	V							l	
1997 E&E	IVIV-21	97-0WIT-101-3B	SL	0/9/97	_	3-5	1																	~								<u> </u>
1997 E&E	SB-173	97-UMT-102-SB	SL	8/9/97	_	6.5-7.5	1								X									X							<u>_</u>	
1997 E&E	SB-174	97-UMT-103-SB	SL	8/9/97		6.5-8.5	1								X									Х								
1997 E&E	SB-175	97-UMT-104-SB	SL	8/9/97		5.5-7	1								X									Х							<u> </u>	
1997 E&E	MW-22	97-UMT-105-SB	SL	8/10/97		6.5-8.5	1								Х									Х							<u>ا</u> ا	┣──
1997 E&E	SB-176	97-UMT-106-SB	SL	8/10/97		7.5-9	1								Х									Х							<u>ا</u> ا	┣──
1997 E&E	SB-177	97-UMT-107-SB	SL	8/10/97		5-7	1								Х									Х								
1997 E&E	SB-178	97-UMT-108-SB	SL	8/10/97		4-6	1								Х									Х							<u>ا</u> ا	┣──
1997 E&E	SB-178	97-UMT-109-SB	SL	8/10/97		4-6		1							Х									Х							<u> </u>	
1997 E&E	SB-178	97-UMT-110-SB ^ε	SL	8/10/97		4-6			1						Х									Х								
1997 E&E	SB-179	97-UMT-111-SB	SL	8/10/97		7-9	1								Х									Х								
1997 E&E	MW-24	97-UMT-112-SB	SL	8/11/97		7.5-9.5	1								Х									Х								
1997 E&E	MW-25	97-UMT-113-SB	SL	8/11/97		6-8	1								Х									Х								
1997 E&E	SB-180	97-UMT-114-SB	SL	8/12/97		8.5-9.5	1								Х									Х								
1997 E&E	MW-26	97-UMT-115-SB	SL	8/12/97		6-8	1								Х									Х								
1997 E&E	SB-181	97-UMT-116-SB	SL	8/12/97		5.5-7	1								Х									Х								
1997 E&E	SB-182	97-UMT-117-SB	SL	8/12/97		5-7	1								Х	1								Х								
1997 E&E	SB-183	97-UMT-118-SB	SL	8/12/97		5-7	1								x	1								Х							 	
1997 F&F	MW-27	97-UMT-119-SR	SI	8/13/07		7-8.5	1								×	1								x								
1007 EVE	SR-184	97_I IMT_120 CD	QI	8/11/07		55.7	1	+							v	-								v								<u> </u>
1007 595	CD-104	07 LIMT 404 OD	01	0/14/37		0.0-1																		^ V							l	-
1997 E&E	SB-185	97-UNIT-121-SB	SL Ci	0/14/97		8-0	1	+	\rightarrow						X		+							X							I	
1997 E&E	SB-186	97-UMT-122-SB	SL	8/16/97		6-7.5	1								X									Х								I
1997 E&E	SB-186	97-UMT-123-SB	SL	8/16/97		6-7.5		1							Х									Х								_
1997 E&E	SB-186	97-UMT-124-SB ^ε	SL	8/16/97		6-7.5			1						Х									Х							 	
1997 E&E	SB-187	97-UMT-125-SB	SL	8/16/97		5-6.5	1	1							Х	1								Х				1			, I	l I

Table E-1

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Table E-1 Soil and Sediment Sampling and Laboratory Analysis Summary

		Sample Informatio	n																Soil/S	Sedim	ent S	Samp	le An	alysis	5							
Event	Sample Location	Sample Number	Matrix	Sample Date	Median Sample Depth (ft. bgs)	Sample Depth (feet bgs)	Project Sample	Duplicate Sample	Triplicate Sample	MS/MSD Sample	GRO/BTEX (AK 101)	GRO (AK M 8015)	GRO (AK 101)	DRO (AK M 8100)	DRO (AK 102)	RRO (AK 103)	TRPH (method not listed)	Fuel ID (Corps M 8015)	VOC (SW-846 Method 8260A)	PAH (non-specified GC/MS SIM method)	Pest/PCB (SW-846 Method 8080A)	Pest/PCB (SW-846 Method 8081A)	PCB (SW-846 Method 8081)	Pesticides (SW-846 Method 8081)	PCB (SW-846 Method 8082)	BNA (SW-846 Method 8270B)	Arsenic (EPA Method 7060)	Lead (EPA Method 6010A)	Lead (SW-846 Method 7421)	TCLP Lead (SW-846 Method 1311/7421)	TAL Metals (Cu & Pb)	TAL Metals (SW-846 Method 6000/7000 Series)
1998 E&E		98-UMT-600-SD	SD	8/10/98			1			1														Х								
1998 E&E		98-UMT-601-SD	SD	8/10/98																				Х								
1998 E&E		98-UMT-602-SD	SD	8/10/98			1																	Х								1
1998 E&E		98-UMT-603-SD	SD	8/10/98			1																	Х								L
1998 E&E		98-UMT-604-SD	SD	8/18/98			1																	Х								L
1998 E&E		98-UMT-605-SD	SD	8/18/98			1																	Х							\square	
1998 E&E		98-UMT-606-SD	SD	8/18/98			1																	Х							\square	
1998 E&E		98-UMT-607-SD	SD	8/18/98			1																	Х							<u> </u>	<u> </u>
1998 E&E		98-UMT-608-SD	SD	8/18/98			1																	Х							\square	
1998 E&E		98-UMT-609-SD	SD	8/18/98			1																	Х							<u> </u>	<u> </u>
1998 E&E		98-UMT-610-SD	SD	8/18/98			1																	Х							<u> </u>	<u> </u>
1998 E&E		98-UMT-621-SD	SD	8/19/98			1			1					Х				Х					Х	Х	Х					\vdash	<u> </u>
1998 E&E		98-UMT-622-SD	SD	8/19/98			1								Х				Х					Х	Х	Х					⊢──┤	<u> </u>
1998 E&E		98-UMT-623-SD	SD	8/19/98				1							Х				Х					Х	Х	Х					⊢──┤	<u> </u>
1998 E&E		98-UMT-624-SD	SD	8/19/98			1								Х				Х					Х	Х	Х					⊢──┤	<u> </u>
1998 E&E		98-UMT-625-SD	SD	8/19/98			1								X				X					X	X	X					⊢	<u> </u>
1998 E&E		98-UMT-626-SD	SD	8/19/98			1								X				X					X	X	X					<u> </u>	<u> </u>
1998 E&E		98-UMT-627-SD	SD	8/19/98			1								X				X					X	X	X					┝──┤	
1998 E&E		98-UMT-628-SD	SD	8/19/98			1								X				X					X	X	X					┝──┤	
1998 E&E		98-UMT-629-SD	SD	8/19/98			1								X				X					X	X	X					$ \vdash $	<u> </u>
1998 E&E		98-UMT-630-SD	SD	8/19/98			1								X				X					X	X	X					$ \vdash $	<u> </u>
1998 E&E		98-UNIT-631-SD	50	8/19/98			1								X				X					X	X	X					⊢ −−	
1990 E&E		98-UNIT-632-5D	20	0/19/98 9/10/09			4	1							X				X					X	X	X					⊢ −−	
1000 E 0 E		00 LIMT 624 CD	20	0/13/30			1																									
1008 E&E		90-UNIT-034-5D	30	0/19/90 8/10/08			1																		×						-	
1990 E&E		98-UMT-636-SD	SD	8/19/98			1					-		-	X				X					X	X	X					-	
								1				1	1		~	1			~			1	1	~	~	~		1	1			,

Matrix Key:

SL Soil

SD Sediment

- Analysis Key: GRO Gasoline range organics BTEX Benzene, toluene, ethylbenzene, and xylenes
 - DRO Diesel range organics
 - RRO Residual range organics
 - TRPH Total recoverable petroleum hydrocarbons
 - VOC Volatile organic compounds
 - PAH Polynuclear aromatic hydrocarbons
 - PCB Polychlorinated biphenyls

 - BNA
 Base-, neutral-, acid-extractable compounds

 TCLP
 Toxicity characteristic leaching procedure
 - TAL Total analyte list

Notes:

- α
 Not listed in Table 3-3 Unit C Sampling and Analysis Summary

 β
 Listed in Table 4-31 as 96-UMT-203-SB
- $\begin{array}{l} \gamma \\ \text{Triplicate samples not listed in Table 4-31 results} \\ \delta \\ \text{Listed as 96-UMT-401-SS in Table 4-31} \end{array}$
- ϵ 1997 Triplicate results not listed in results summary tables
- ζ These samples are not included in Table 2-3 of sediment results

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Table E-2
Surface Water and Groundwater Sampling and Laboratory Analysis Summary

		Sample Information	n		1	1		T	r	1		1	n		r	W	ater S	Sampl	e An	alysis	n	r			
Event	Sample Location	Sample Number	Matrix	Sample Date	Median Sample Depth (ft. bgs)	Sample Depth (feet bgs)	Project Sample	Duplicate Sample	Triplicate Sample	MS/MSD Sample	GRO (AK 101)	DRO (AK 102)	TRPH (EPA 418.1)	VOC (SW-846 Method 8260A)	PAH (non-specified GC/MS SIM method)	PAH (SW-846 Method 8310)	Pest/PCB (EPA 8080A)	Pest/PCB (EPA 8081)	Pesticides (SW-846 Method 8081)	PCB (SW-846 Method 8082)	Arsenic (EPA Method 7060)	Lead (SW-842 method 7421)**	Metals (Filtered)	Total Metals	TAL Metals (SW-846 Method 6000/7000 Series)**
1996 AGRA		1639-04	SW	8/8/96	0	0	1							Х	Х		Х				Х	Х			
1996 AGRA 1996 AGRA		1639-05 1639-16	SW SW	8/8/96	0	0	1							Х	X X		X X ^α				X X	X X	<u> </u>		
1996 E&E	LC	96-UMT-227-SW	SW	8/11/96	NA	NA	1							Х		Х	Х					~	—	X	
1996 E&E	LC	96-UMT-227-SW-F	SW	8/11/96	NA	NA	1																Х		
1996 E&E	LC	96-UMT-228-SW	SW	8/11/96	NA	NA		1						Х		Х	Х							Х	
1996 E&E	LC	96-UMT-228-SW-F	SW	8/11/96	NA	NA		1															X	<u> </u>	
1996 E&E	LA	96-UMT-231-SW	SW	8/11/96	NA	NA	1							Х		Х	Х						V	X	
1996 E&E	LA	96-UMT-231-SW-F	SW	8/11/96	NA NA		1							Y		v	v						X	v	<u> </u>
1990 E&E	LD	96-UMT-233-SW-F	SW	8/11/96	NA	NA	1			-				^	-	^	^						x	<u> </u>	
1996 E&E	MW-4	96-UMT-332-GW	GW	8/19/96	3.54	3.54	1				Х	x	Х	Х		х	Х							+	
1996 E&E	MW-5	96-UMT-333-GW	GW	8/20/96	5.1	5.1	1				Х	Х	Х	Х			Х								
1996 E&E	MW-6	96-UMT-334-GW	GW	8/20/96	2.69	2.69	1				Х			Х		Х									
1996 E&E	MW-7	96-UMT-335-GW	GW	8/19/96	5.32	5.32	1				Х	Х	Х	Х		Х	Х							<u> </u>	
1996 E&E	MW-7	96-UMT-351-GW	GW	8/19/96	5.32	5.32		1			X	X	V	X		X	V							<u> </u>	
1996 E&E	MW-3	96-UMT-336-GW	GW	8/20/96	0.58	0.58	1				X	X	X X	X X		X	X						<u> </u>	+	
1996 E&E	MW-3	96-UMT-349-GW	GW	8/19/96	3.36	3.36	1	1			X	^	^	X		^	^						<u> </u>	+	
1996 E&E	MW-3	96-UMT-350-GW ^β	GW	0, 10,00	3.36	3.36					X	Х	Х	Х		Х	Х							+	
1996 E&E	MW-7	96-UMT-352-GW ^β	GW		5.32	5.32					Х	Х	Х	Х		Х	Х								
1997 E&E	MW-27	97-UMT-280-GW	GW	8/15/97			1					Х						Х						L	
1997 E&E	MW-27	97-UMT-281-GW	GW	8/15/97				1				X						X						<u> </u>	
1997 E&E	MW-27	97-UMT-282-GW	GW	8/15/97			1		1			X						X X					<u> </u>	+	
1997 E&E	MW-4	97-UMT-284-GW	GW	8/15/97			1					X						^						<u> </u>	
1997 E&E	MW-23	97-UMT-285-GW	GW	8/15/97			1					X						Х						+	
1997 E&E	MW-22	97-UMT-286-GW	GW	8/15/97			1					Х						Х							
1997 E&E	MW-25	97-UMT-287-GW	GW	5/15/97			1					Х						Х							
1997 E&E	MW-7	97-UMT-288-GW	GW	8/15/97			1					X											<u> </u>	─	
1997 E&E	MW-3	97-UMT-289-GW	GW	8/15/97			1					X						Х					<u> </u>	<u> </u>	
1997 E&E 1007 E&E	MW-21	97-UMT-290-GW	GW	8/15/97			1					X												<u> </u>	
1997 E&E	MW-4	97-UMT-300-GW	GW	9/6/97			1											Х							
1997 E&E	MW-7	97-UMT-301-GW	GW	9/6/97			1											Х							
1997 E&E	MW-21	97-UMT-302-GW	GW	9/6/97			1											Х							
1997 E&E	MW-24	97-UMT-303-GW	GW	9/6/97			1							.				Х	• •				<u> </u>	<u> </u>	<u> </u>
1998 E&E		98-UMT-621-SW	SW	8/19/98			1			1		X		X		X			×	X			<u> </u>	<u> </u>	<u> </u>
1990 E&E		98-UMT-623-SW	SW	8/19/98				1		-		×		×		×			×	×			<u> </u>	<u> </u>	<u> </u>
1998 E&E		98-UMT-624-SW	SW	8/19/98			1					X		X		X	1		X	X			1	+	
1998 E&E		98-UMT-625-SW	SW	8/19/98			1	L		L		Х		Х	L	Х			Х	Х					
1998 E&E		98-UMT-626-SW	SW	8/19/98			1					Х		Х		Х			Х	Х					
1998 E&E		98-UMT-627-SW	SW	8/19/98			1					Х		Х		Х	-		Х	Х			<u> </u>		<u> </u>
1998 E&E		98-UMT-628-SW	SW	8/19/98			1					X		X		X			X	X			<u> </u>	<u> </u>	
1998 E&E		98-UMT-629-SW	SW	8/19/98			1					X		X		X			X	X			├──		├───┦
1990 E&E		98-UMT-631-SW	SW	8/19/98			1			-		×		×		×			×	×			<u> </u>	<u> </u>	
1998 E&E		98-UMT-632-SW	SW	8/19/98			<u> </u>	1				X		X		X	1		X	X			1	+	
1998 E&E		98-UMT-633-SW	SW	8/19/98			1			L		Х		Х		Х			Х	Х					
1998 E&E		98-UMT-634-SW	SW	8/19/98			1					Х		Х		Х			Х	Х					
1998 E&E		98-UMT-635-SW	SW	8/19/98			1					Х		Х		Х	-		Х	Х			<u> </u>	_	
1998 E&E	NAMA OA	98-UMT-636-SW	SW	8/19/98			1			-		X		Х		Х			X	X			<u> </u>	<u> </u>	
1998 E&E	IVIVV-24	98-UNT-801-GW	GW	8/10/98 8/10/00			1			1		X			-		+		X	X			├──	<u> </u>	┼───┦
1998 E&F	MW-7	98-UMT-802-GW	GW	8/10/98				1				X							X	X			\vdash	+	┝───┦
1998 E&E	MW-23	98-UMT-803-GW	GW	8/10/98			1					X		<u> </u>					X	X					
1998 E&E	MW-22	98-UMT-804-GW	GW	8/10/98			1					Х							Х	Х				1	

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Table E-2
Surface Water and Groundwater Sampling and Laboratory Analysis Summary

		Sample Informatio	n													W	ater S	Sampl	e Ana	alysis					
Event	Sample Location	Sample Number	Matrix	Sample Date	Median Sample Depth (ft. bgs)	Sample Depth (feet bgs)	Project Sample	Duplicate Sample	Triplicate Sample	MS/MSD Sample	GRO (AK 101)	DRO (AK 102)	TRPH (EPA 418.1)	VOC (SW-846 Method 8260A)	PAH (non-specified GC/MS SIM method)	PAH (SW-846 Method 8310)	Pest/PCB (EPA 8080A)	Pest/PCB (EPA 8081)	Pesticides (SW-846 Method 8081)	PCB (SW-846 Method 8082)	Arsenic (EPA Method 7060)	Lead (SW-842 method 7421)**	Metals (Filtered)	Total Metals	TAL Metals (SW-846 Method 6000/7000 Series)**
1999 E&E	MW-7	99-UMT-003-GW	GW	8/27/99			1					Х							Х	Х					
1999 E&E	MW-23	99-UMT-002-GW	GW	8/27/99			1					Х							Х	Х					
1999 E&E	MW-24	00-UMT-001-GW	GW	8/27/99			1					Х							Х	Х					
1999 E&E	downstream of T3	99-UMT-005-SW	SW	8/27/99			1					Х							Х	Х					
1999 E&E	Transect T3	99-UMT-006-SW	SW	8/27/99			1					Х							Х	Х					
1999 E&E	Transect T1	99-UMT-007-SW	SW	8/27/99			1					Х							Х	Х					
1999 E&E	Transect T1	99-UMT-008-SW	SW	8/27/99				1		1		Х							Х	Х					

Matrix Key:

SW Surface water

GW Groundwater

Analysis Key:

GRO Gasoline range organics

DRO Diesel range organics

TRPH Total recoverable petroleum hydrocarbons

VOC Volatile organic compounds

PAH Polynuclear aromatic hydrocarbons

PCB Polychlorinated biphenyls

TAL Total analyte list

Notes:

 α $\;$ Not listed in summary table for Pest/PCB, but results are listed in full analytical report

 β Triplicate samples not listed in Table 4-31 results

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Table E-3 Fish Tissue Sampling and Laboratory Analysis Summary

	San	nple Information					Fish	Analysis					
Event	Sample Location	Sample Number	Matrix	Sample Date	Fish Identifier	Species	Length (inches)	Weight (grams)	Analyze	Archive	PCB (3550C/8082)	Pesticides (3550C/8081A)	PCB (SW-846 method 8081)
1997 E&E	SEAS. STREAM	97-UMT-060-FWB	FT	8/10/97	2		12.75	245.1					Х
1997 E&E	SEAS. STREAM	97-UMT-061-FWB	FT	8/10/97	3		11.00	194.7					Х
1997 E&E	SEAS. STREAM	97-UMT-062-FWB	FT	8/11/97	6		12.50	295.3					Х
1997 E&E	SEAS. STREAM	97-UMT-063-FWB	FT	8/11/97	7		12.00	258.6					X
1997 E&E	SEAS. STREAM	97-UMT-064-FWB		8/11/97	9		10.75	185.5					X
1997 E&E	SEAS. STREAM	97-UMT-066-FWB	FT	8/11/97	12		12.50	214.9					X
1997 E&E	BACKGROUND	97-UMT-067-FW/B ^α	FT	8/11/97	1		11 50	223.4				[X
1997 F&F	BACKGROUND	97-UMT-068-FWB ^α	FT	8/11/97	4		12.25	270.7					X
1997 E&E	BACKGROUND	97-UMT-069-FWB ^α	FT	8/11/97	5		13.00	220.8					X
1997 E&E	SEAS. STREAM	97-UMT-070-FF	FT	8/10/97	8		13.13	296.2					X
1997 E&E	SEAS. STREAM	97-UMT-071-FF	FT	8/10/97	10		15.00	446.1					Х
1997 E&E	SEAS. STREAM	97-UMT-072-FF	FT	8/10/97	11		14.50	399.3					Х
1997 E&E	SEAS. STREAM	97-UMT-073-FF	FT	8/11/97	15		13.50	363.5				L	Х
1997 E&E	SEAS. STREAM	97-UMT-074-FF ^β	FT	8/11/97	01BKG		13.25	295.1					Х
1997 E&E	SEAS. STREAM	97-UMT-075-FF ^B	FT	8/11/97	04BKG		12.75	279.7					Х
1997 E&E	SEAS. STREAM	97-UMT-076-FF ^β	FT	8/11/97	05BKG		14.50	347.8				L	X
1997 E&E	BACKGROUND	97-UMT-077-FF	FT	8/11/97	02BKG		13.00	281.7					X
1997 E&E 1997 F&F	BACKGROUND	97-UMT-078-FF	FT	8/11/97	03BKG		14.00	381.7					X
1007 E&E	Slough	98-UMT-401-FT	FT	8/13/98	OODINO	Burbot	15.15	230.4	Y		Y	Y	
1998 E&E	Slough	98-UMT-402-FT	FT	8/13/98		Whitefish			X		X	X	
1998 E&E	Slough	98-UMT-403-FT	FT	8/13/98		Whitefish			X		X	X	
1998 E&E	Slough	98-UMT-404-FT	FT	8/13/98		Whitefish			Х		Х	Х	
1998 E&E	Slough	98-UMT-405-FT	FT	8/13/98		Whitefish			Х		Х	Х	
1998 E&E	Slough	98-UMT-406-FT	FT	8/13/98		Whitefish				Х	Х	X	
1998 E&E	Slough	98-UMT-407-FT	FT	8/13/98		Whitefish				X	X	X	
1998 E&E	Linstream	98-UMT-408-FT	FT	8/13/98		Whitefish			x	~	X	X	
1998 E&E	Upstream	98-UMT-410-FT	FT	8/13/98		Whitefish			X		X	X	
1998 E&E	Upstream	98-UMT-411-FT	FT	8/13/98		Whitefish			X		Х	X	
1998 E&E	Upstream	98-UMT-412-FT	FT	8/13/98		Whitefish			Х		Х	Х	
1998 E&E	Upstream	98-UMT-413-FT	FT	8/13/98		Whitefish			Х		Х	Х	
1998 E&E	Upstream	98-UMT-414-FT	FT	8/13/98		Burbot			Х		Х	Х	
1998 E&E	Upstream	98-UMT-415-FT	FT	8/13/98		Burbot			X		X	X	
1996 E&E	Downstream	98-UMT-416-F1	FI	8/13/98		Whitefish			X		X	X	-
1998 E&E	Downstream	98-UMT-418-FT	FT	8/13/98		Whitefish			X		X	X	
1998 E&E	Downstream	98-UMT-419-FT	FT	8/13/98		Whitefish			X		Х	X	
1998 E&E	Downstream	98-UMT-420-FT	FT	8/13/98		Whitefish			Х		Х	Х	
1998 E&E	Downstream	98-UMT-421-FT	FT	8/13/98		Whitefish				Х	Х	Х	
1998 E&E	Downstream	98-UMT-422-FT	FT	8/13/98		Whitefish				Х	Х	X	<u> </u>
1998 E&E	Downstream	98-UMT-423-FT		8/13/98		Whitefish				X	X	X	
1998 E&E	Downstream	98-UMT-424-FT	FT	8/13/98		Whitefish				×	×	X	
1998 E&E	Downstream	98-UMT-426-FT	FT	8/13/98		Burbot			х	~	X	X	
1998 E&E	Slough	98-UMT-427-FT	FT	8/14/98		Whitefish			X		Х	X	
1998 E&E	Slough	98-UMT-428-FT	FT	8/14/98		Whitefish				Х	Х	Х	
1998 E&E	Slough	98-UMT-429-FT	FT	8/14/98		Whitefish				Х	Х	Х	
1998 E&E	Slough	98-UMT-430-FT	FT	8/14/98		Whitefish				X	X	X	
1998 E&E	Slough	98-UNI-431-F1		8/14/98 8/14/09		Whitefish				X	X	X	──
1998 F&F	Upstream	98-UMT-433-FT	FT	8/14/98		Whitefish				X	X	X	\vdash
1998 E&E	Upstream	98-UMT-434-FT	FT	8/14/98		Burbot			Х		X	X	
1998 E&E	Upstream	98-UMT-435-FT	FT	8/15/98		Whitefish				Х	Х	Х	
1998 E&E	Upstream	98-UMT-436-FT	FT	8/15/98		Whitefish				Х	Х	Х	
1998 E&E	Upstream	98-UMT-437-FT	FT	8/15/98		Whitefish				Х	Х	X	<u> </u>
1998 E&E	Downstream	98-UMT-438-FT	FT	8/20/98		Burbot			X		X	X	
1998 E&E	Slough	98-UMT-439-FT	ΓI	8/21/98		Burbot			X		Х	X	

Matrix Key:

FT Fish tissue

PCB Polychlorinated biphenyls

Notes:

- α These samples were listed in the original 1997 sampling and analysis summary as Fish Fillet (FF) samples collected from the Seasonal Stream; however, results Table 3-15 lists these as background Fish Whole Body (FWB) samples, and the weights/lengths match.
- β These samples were listed in the original 1997 sampling and analysis summary as Fish Whole Body (FWB) samples collected from Background areas; however, results Table 3-15 list these as seasonal stream Fish Fillet (FF) samples, and the weights/lengths match

APPENDIX F

TABLE F-1A: SUMMARY OF PCL AND TBC CONCENTRATIONS TABLE F-1C: SUMMARY OF TBC CONCENTRATIONS - FISH TISSUE TABLES F-2A TO F-2E: SUMMARY OF SOIL-SAMPLE RESULTS TABLES F-3A TO F-3E: SUMMARY OF SEDIMENT-SAMPLE RESULTS TABLES F-4A TO F-4E: SUMMARY OF SURFACE-WATER SAMPLE RESULTS TABLES F-5A TO F-5D: SUMMARY OF GROUNDWATER-SAMPLE RESULTS TABLE F-6: SUMMARY OF FISH-TISSUE SAMPLE RESULTS

 Table F-1a

 Summary of PCL and TBC Concentrations for Soil and Sediment

			S	oil			Sedi	ment	
	CAS Number/			PCL				PCL	
Analyte	Abbreviation	Units	PCL	Source	TBC	Units	PCL	Source	ТВС
Petroleum Hydrocarbons									
Gasoline Range Organics	GRO	mg/kg	260	OFMTG	_	mg/kg	260	—	
Diesel Range Organics	DRO	mg/kg	230	OFMTG	_	mg/kg	230	—	—
Residual Range Organics	RRO	mg/kg	8300	OFIG		mg/kg	8300	—	—
Volatile Organic Compounds									
Acetone	67-64-1	mg/kg	88	MTG	2.5	mg/kg	88	MTG	
Acrolein	107-02-8	mg/kg	—	—	5.27	mg/kg	_	—	—
Acrylonitrile	107-13-1	mg/kg	—	_	0.000007	mg/kg	_	—	0.00007
Benzene	71-43-2	mg/kg	0.025	MTG	0.01	mg/kg	0.25	MTG	0.01
Bromobenzene	108-86-1	mg/kg	—	—	_	mg/kg	_	—	—
Bromochloromethane	74-97-5	mg/kg	—	_	_	mg/kg	_	—	—
Bromodichloromethane	75-27-4	mg/kg	0.044	MTG	0.54	mg/kg	0.44	MTG	—
Bromoform	75-25-2	mg/kg	0.34	MTG	15.9	mg/kg	0.34	MTG	75
Bromomethane	74-83-9	mg/kg	0.16	MTG	0.235	mg/kg	0.16	MTG	—
2-Butanone (methyl ethyl ketone)	78-93-3	mg/kg	59	MTG	89.6	mg/kg		—	35
tert-Butylbenzene	98-06-6	mg/kg	12	MTG	_	mg/kg	12	MTG	—
Carbon disulfide	75-15-0	mg/kg	12	MTG	0.0941	mg/kg	12	MTG	—
Carbon tetrachloride	56-23-5	mg/kg	0.023	MTG	0.4	mg/kg	0.023	MTG	0.17
Chlorobenzene	108-90-7	mg/kg	0.63	MTG	0.03	mg/kg	0.63	MTG	0.03
Chloroethane	75-00-3	mg/kg	34	AZOI	_	mg/kg	34	AZOI	—
2-Chloroethyl vinyl ether	110-75-8	mg/kg		_	_	mg/kg	_	—	—
Chloroform	67-66-3	mg/kg	0.46	MTG	1.19	mg/kg	0.46	MTG	0.02
Chloromethane	74-87-3	mg/kg	0.21	MTG	10.4	mg/kg	0.21	MTG	—
2-Chlorotoluene	95-49-8	mg/kg	—	—	_	mg/kg	_	—	—
3-Chlorotoluene	108-41-8	mg/kg	_	—	_	mg/kg	_	_	—
4-Chlorotoluene	106-43-4	mg/kg		—	_	mg/kg		—	—
1,1-Dichloroethane	75-34-3	mg/kg	25	MTG	0.02	mg/kg	25	MTG	0.02
1,1-Dichloroethene	75-35-4	mg/kg	0.03	MTG	0.1	mg/kg	0.03	MTG	0.1
cis-1,2-Dichloroethene	156-59-2	mg/kg	0.24	MTG	_	mg/kg	0.24	MTG	—
trans-1,2-Dichloroethene	156-60-5	mg/kg	0.37	MTG	_	mg/kg	0.37	MTG	—
1,1-Dichloropropene	563-58-6	mg/kg	—	—	—	mg/kg	—	—	—
cis-1,3-Dichloropropene ²	10061-01-5	mg/kg	0.033	MTG	0.398	mg/kg	0.033	MTG	—
trans-1,3-Dichloropropene ²	10061-02-6	mg/kg	0.033	MTG	0.398	mg/kg	0.033	MTG	—
1,3-Dichloropropene (total)	542-75-6	mg/kg	0.033	MTG	—	mg/kg	0.033	MTG	
1,2-Dibromo-3-chloropropane	96-12-8	mg/kg		—	0.0352	mg/kg		—	—
1,2-Dibromoethane	106-93-4	mg/kg	0.00016	MTG	1.23	mg/kg	0.00016	MTG	

Soil Sediment PCL PCL CAS Number/ Analyte Units PCL TBC Units PCL TBC Source Source Abbreviation 1.2-Dichlorobenzene 95-50-1 mg/kg 5.1 MTG 0.03 5.1 MTG 0.03 mg/kg 1.2-Dichloroethane 107-06-2 mg/kg 0.016 MTG 0.02 mg/kg 0.016 MTG 0.02 1,2-Dichloropropane 78-87-5 0.018 MTG 0.002 0.018 MTG 0.002 mg/kg mg/kg 541-73-1 28 MTG MTG 0.03 1.3-Dichlorobenzene mg/kg 0.03 mg/kg 28 1,3-Dichloropropane 142-28-9 mg/kg _ mg/kg _ ____ ____ ____ _ MTG MTG 106-46-7 0.64 0.03 0.64 0.03 1.4-Dichlorobenzene mg/kg mg/kg 1.4-Dioxane 123-91-1 mg/kg 0.21 MTG 2.05 mg/kg 0.21 MTG ____ 2,2-Dichloropropane 594-20-7 mg/kg ____ mg/kg _ _ _ _ ___ Dibromochloromethane 124-48-1 0.032 MTG 2.05 0.032 MTG mg/kg mg/ka ____ Dibromomethane 74-95-3 MTG 65 mg/kg 1.1 mg/kg _ _ _ 75-71-8 MTG Dichlorodifluoromethane 140 MTG 39.5 140 mg/kg mg/kg ___ 6.9 MTG 0.03 6.9 MTG Ethvlbenzene 100-41-4 mg/kg mg/kg 0.03 Hexachlorobutadiene 87-68-3 mg/kg 0.12 MTG 0.0398 mg/kg 0.12 MTG _ 2-Hexanone 591-78-6 12.6 mg/kg ____ mg/kg ____ ____ _ Isopropylbenzene 98-82-8 51 MTG 51 MTG mg/kg _ mg/kg ____ 4-Isopropyltoluene 99-87-6 mg/kg ____ ____ mg/kg ____ _ ____ ____ 4-Methyl-2-pentanone 108-10-1 mg/kg 8.1 MTG 443 mg/kg 75-09-2 Methylene chloride 0.016 MTG 0.4 0.016 MTG 0.018 mg/kg mg/kg 91-20-3 20 MTG 0.0994 20 MTG 0.01465 Naphthalene mg/kg mg/kg 104-51-8 15 MTG 15 MTG n-Butvlbenzene mg/kg _ mg/kg ____ n-Propylbenzene 15 MTG 15 MTG 103-65-1 mg/kg mg/kg _ _ sec-Butvlbenzene 135-98-8 ma/ka 12 MTG 12 MTG ____ mg/kg _____ 100-42-5 0.96 MTG 0.3 0.96 MTG 0.2 Stvrene mg/kg mg/kg 225 1,1,1,2-Tetrachloroethane 630-20-6 mg/kg mg/kg _ _ 1.1.1-Trichloroethane 71-55-6 mg/kg 0.82 MTG 0.07 mg/kg 0.82 MTG 0.07 79-34-5 0.017 MTG 0.017 MTG 1.1.2.2-Tetrachloroethane mg/kg 0.127 mg/kg 1,1,2-Trichloro-1,2,2-trifluoroethane 76-13-1 mg/kg 10 AZDC mg/kg 750 MTG _ ____ 1.1.2-Trichloroethane 79-00-5 mg/kg 0.018 MTG 0.4 0.018 MTG 0.4 mg/kg 1.2.3-Trichlorobenzene 87-61-6 0.03 0.011 mg/kg mg/kg 96-18-4 0.00053 MTG 0.00053 MTG 1,2,3-Trichloropropane mg/kg 3.36 mg/kg ____ MTG 1,2,4-Trichlorobenzene 120-82-1 mg/kg 0.85 MTG 0.03 0.85 0.011 mg/kg 1,2,4-Trimethylbenzene 95-63-6 23 MTG 23 MTG mg/kg _ mg/kg _ 1.3.5-Trimethylbenzene 23 MTG 23 MTG 108-67-8 mg/kg _ ____ ma/ka 127-18-4 MTG MTG Tetrachloroethene 0.024 0.002 0.024 0.002 mg/kg mg/kg 109-99-9 0.1 Tetrahydrofuran mg/kg ____ 0.1 mg/kg ____ ____ Toluene 108-88-3 mg/kg 6.5 MTG 0.01 6.5 MTG 0.01 mg/kg 79-01-6 0.02 0.02 MTG Trichloroethene mg/kg MTG 0.1 mg/kg _

Table F-1a Summary of PCL and TBC Concentrations for Soil and Sediment

 Table F-1a

 Summary of PCL and TBC Concentrations for Soil and Sediment

			S	oil			Sedi	ment	
	CAS Number/			PCL				PCL	
Analyte	Abbreviation	Units	PCL	Source	ТВС	Units	PCL	Source	TBC
Trichlorofluoromethane	75-69-4	mg/kg	86	MTG	16.4	mg/kg	86	MTG	_
Vinyl acetate	108-05-4	mg/kg	100	MTG	12.7	mg/kg	100	MTG	—
Vinyl chloride	75-01-4	mg/kg	0.0085	MTG	0.01	mg/kg	0.0085	MTG	0.01
Xylenes (total)	1330-20-7	mg/kg	63	MTG	0.1	mg/kg	63	MTG	0.13
Semivolatile Organic Compounds									
Acenaphthene	83-32-9	mg/kg	180	MTG	20	mg/kg	180	MTG	0.00671
Acenaphthylene	208-96-8	mg/kg	180	MTG	682	mg/kg	180	MTG	0.00587
Anthracene	120-12-7	mg/kg	3000	MTG	1.48E+03	mg/kg	3000	MTG	0.01
Benzo(a)anthracene	56-55-3	mg/kg	3.6	MTG	5.21	mg/kg	3.6	MTG	0.01572
Benzo(a)pyrene	50-32-8	mg/kg	0.66	AZDC	1.52	mg/kg	0.66	AZDC	0.0319
Benzo(b)fluoranthene	205-99-2	mg/kg	6.6	AZDC	59.8	mg/kg	6.6	AZDC	—
Benzo(g,h,i)perylene	191-24-2	mg/kg	1900	AZDC	119	mg/kg	1900	AZDC	0.17
Benzo(k)fluoranthene	207-08-9	mg/kg	66	AZDC	148	mg/kg	66	AZDC	0.0272
Benzoic acid	65-85-0	mg/kg	410	MTG	_	mg/kg	410	MTG	
Benzyl alcohol	100-51-6	mg/kg	_	_	65.8	mg/kg	_	_	
Benzyl butyl phthalate	85-68-7	mg/kg	920	MTG	0.1	mg/kg	920	MTG	0.1
4-Bromophenyl phenyl ether	101-55-3	mg/kg	_	—		mg/kg	_	_	
4-Chloroaniline	106-47-8	mg/kg	0.057	MTG	0.3	mg/kg	0.057	MTG	_
bis-(2-Chloroethoxy)methane	111-91-1	mg/kg	_		0.302	mg/kg	_		_
bis-(2-Chloroethyl)ether	111-44-4	mg/kg	0.0022	MTG	23.7	mg/kg	0.0022	MTG	—
bis-(2-Chloroisopropyl)ether	108-60-1	mg/kg	_	—	19.9	mg/kg	_	_	_
4-Chloro-3-methyl phenol	59-50-7	mg/kg			7.95	mg/kg	_		15
2-Chloronaphthalene	91-58-7	mg/kg	120	MTG	0.0122	mg/kg	120	MTG	0.25
2-Chlorophenol	95-57-8	mg/kg	1.5	MTG	0.01	mg/kg	1.5	MTG	0.055
4-Chlorophenyl phenyl ether	7005-72-3	mg/kg	_	_	—	mg/kg	_	_	
Chrysene	218-01-9	mg/kg	360	MTG	4.73	mg/kg	360	MTG	0.02683
Dibenzo(a,h)anthracene	53-70-3	mg/kg	0.66	AZDC	18.4	mg/kg	0.66	AZDC	0.00622
Dibenzofuran	132-64-9	mg/kg	11	MTG	—	mg/kg	11	MTG	5.1
1,2-Dichlorobenzene	95-50-1	mg/kg	5.1	MTG	0.03	mg/kg	5.1	MTG	0.03
1,3-Dichlorobenzene	541-73-1	mg/kg	28	MTG	0.03	mg/kg	28	MTG	0.03
1,4-Dichlorobenzene	106-46-7	mg/kg	0.64	MTG	0.03	mg/kg	0.64	MTG	0.03
3,3'-Dichlorobenzidine	91-94-1	mg/kg	0.19	MTG	0.646	mg/kg	0.19	MTG	—
2,4-Dichlorophenol	120-83-2	mg/kg	1.3	MTG	0.01	mg/kg	1.3	MTG	0.01
2,4-Dimethylphenol	105-67-9	mg/kg	8.8	MTG	0.01	mg/kg	8.8	MTG	
Diethyl phthalate	84-66-2	mg/kg	130	MTG	0.1	mg/kg	130	MTG	0.53
Dimethyl phthalate	131-11-3	mg/kg	1100	MTG	0.1	mg/kg	1100	MTG	1

Soil Sediment PCL PCL CAS Number/ Analvte Units PCL TBC PCL TBC Source Units Source Abbreviation Di-n-butyl phthalate 84-74-2 mg/kg 80 MTG 0.1 80 MTG 0.11 mg/kg Di-n-octyl phthalate 117-84-0 mg/kg 3800 MTG 01 mg/kg 3800 MTG 0.1 2,4-Dinitrophenol 51-28-5 0.54 MTG 0.0609 0.54 MTG mg/kg mg/kg ____ 121-14-2 0.0093 MTG 0.0093 MTG 2.4-Dinitrotoluene mg/kg 1.28 mg/kg ____ 2.6-Dinitrotoluene 606-20-2 0.0094 MTG 0.0328 0.0094 MTG mg/kg mg/kg ____ 117-81-7 13 MTG 13 MTG 0.1 bis-(2-Ethylhexyl)phthalate mg/kg 0.1 mg/kg Fluoranthene 206-44-0 mg/kg 1400 MTG 122 mg/kg 1400 MTG 0.03146 86-73-7 220 MTG 30 220 MTG 0.01 Fluorene mg/kg mg/kg 118-74-1 0.047 MTG 0.199 0.047 MTG Hexachlorobenzene mg/kg mg/kg 0.0014 87-68-3 0.12 MTG 0.0398 0.12 MTG Hexachlorobutadiene mg/kg mg/kg _ 77-47-4 MTG 0.755 MTG Hexachlorocyclopentadiene mg/kg 1.3 mg/kg 1.3 _ 67-72-1 0.21 MTG 0.21 MTG Hexachloroethane mg/kg 0.596 mg/kg Indeno(1,2,3-cd)pyrene 193-39-5 mg/kg 6.6 AZDC 109 mg/kg 6.6 AZDC 0.01732 Isophorone 78-59-1 3.1 MTG 139 3.1 MTG mg/kg mg/kg ____ 2-Methyl-4.6-dinitrophenol 534-52-1 0.144 mg/kg mg/kg ____ 91-57-6 6.1 MTG 3.24 MTG 2-Methylnaphthalene mg/kg mg/kg 6.1 ____ 2-Methylphenol (o-cresol) 95-48-7 15 MTG 0.05 15 MTG 0.5 mg/kg mg/kg 4-Methylphenol (p-cresol) 106-44-5 1.5 MTG 0.05 1.5 MTG 0.0051 mg/kg mg/kg 91-20-3 20 MTG 0.0994 20 MTG 0.01465 Naphthalene mg/kg mg/kg 88-74-4 2-Nitroaniline 74.1 _ mg/kg _ ____ mg/kg ____ ____ 3-Nitroaniline 99-09-2 mg/kg 3.16 mg/kg _ _ _ ____ _ 4-Nitroaniline 100-01-6 ma/ka 21.9 ____ ____ mg/kg _ ____ _ Nitrobenzene 98-95-3 0.094 MTG 1.31 0.094 MTG mg/kg mg/kg ___ 2-Nitrophenol 88-75-5 1.6 mg/kg mg/kg ____ ____ 4-Nitrophenol 100-02-7 mg/kg ____ ____ 5.12 mg/kg ____ ____ ____ 0.0011 MTG n-Nitrosodi-n-propylamine 621-64-7 mg/kg 0.0011 MTG 0.544 mg/kg ____ n-Nitrosodiphenylamine 86-30-6 mg/kg 15 MTG 0.545 mg/kg 15 MTG _ Pentachlorophenol 87-86-5 0.047 MTG 0.199 0.047 MTG 0.01 mg/kg mg/kg 85-01-8 3000 MTG 45.7 3000 MTG 0.01873 Phenanthrene mg/kg mg/kg 108-95-2 MTG 30 MTG 0.048 Phenol mg/kg 68 mg/kg 68 129-00-0 1000 MTG 78.5 1000 MTG 0.04427 Pvrene mg/kg mg/kg 120-82-1 0.85 MTG 0.03 0.85 MTG 0.011 1,2,4-Trichlorobenzene mg/kg mg/kg MTG MTG 2.4.5-Trichlorophenol 95-95-4 67 0.01 67 0.01 ma/ka ma/ka 2,4,6-Trichlorophenol 88-06-2 1.4 MTG 0.01 1.4 MTG 0.01 mg/kg mg/kg

Table F-1a Summary of PCL and TBC Concentrations for Soil and Sediment

 Table F-1a

 Summary of PCL and TBC Concentrations for Soil and Sediment

			S	oil			Sedi	ment	
	CAS Number/			PCL				PCL	
Analyte	Abbreviation	Units	PCL	Source	ТВС	Units	PCL	Source	ТВС
Polychlorinated Biphenyls (PCBs)									
PCB-1016 (Aroclor 1016)	—	_	_	_	—	_	_	_	—
PCB-1221 (Aroclor 1221)	—	—	_	_	—	_	_	—	—
PCB-1232 (Aroclor 1232)	—	—	_	—	—	—	—	—	—
PCB-1242 (Aroclor 1242)	—	—	—	—	—	—		—	—
PCB-1248 (Aroclor 1248)	—	_	_	—	—	—	—	_	—
PCB-1254 (Aroclor 1254)	—	_	_	—	—	—	—	_	0.06
PCB-1260 (Aroclor 1260)	—	—	—	—	—	—	—	—	—
Total PCBs	1336-36-3	mg/kg	1	AZDC	0.000332	mg/kg	1	AZDC	0.06
Pesticides									
Aldrin	309-00-2	mg/kg	0.07	MTG	0.00006	mg/kg	0.07	MTG	0.00006
Chlordane (total)	57-74-9	mg/kg	2.3	MTG	0.00003	mg/kg	2.3	MTG	0.00003
4,4'-DDD	72-54-8	mg/kg	7.2	MTG	0.01	mg/kg	_	—	0.00354
4,4'-DDE	72-55-9	mg/kg	5.1	MTG	0.01	mg/kg	_	—	0.00142
4,4'-DDT ³	50-29-3	mg/kg	7.3	MTG	0.01	mg/kg	—	_	0.00119
Dieldrin	60-57-1	mg/kg	0.0076	MTG	0.022	mg/kg	0.0076	MTG	0.0005
Endosulfan I	959-98-8	mg/kg	—	—	0.00001	mg/kg	_	—	0.00001
Endosulfan II	33213-65-9	mg/kg	—	—	0.00001	mg/kg	_	—	0.00001
Endosulfan (total)	115-29-7	mg/kg	64	MTG	—	mg/kg	64	MTG	0.00001
Endosulfan sulfate	1031-07-8	mg/kg	_	—	0.0358	mg/kg	—	_	—
Endrin	72-20-8	mg/kg	0.29	MTG	0.00004	mg/kg	0.29	MTG	0.00004
Endrin aldehyde	7421-93-4	mg/kg	—	—	0.0105	mg/kg	_	—	—
Endrin ketone	53494-70-5	mg/kg	—	—	—	mg/kg	_	—	—
Heptachlor	76-44-8	mg/kg	0.28	MTG	0.00007	mg/kg	0.28	MTG	0.0007
Heptachlor epoxide	1024-57-3	mg/kg	0.014	MTG	0.0000002	mg/kg	0.014	MTG	0.0000002
alpha-HCH	319-84-6	mg/kg	0.0064	MTG	0.003	mg/kg	0.0064	MTG	0.003
beta-HCH	319-85-7	mg/kg	0.022	MTG	0.009	mg/kg	0.022	MTG	0.005
delta-HCH	319-86-8	mg/kg		—	0.01	mg/kg		—	0.01
gamma-HCH (Lindane)	58-89-9	mg/kg	0.0095	MTG	0.00005	mg/kg	0.0095	MTG	0.00005
Methoxychlor	72-43-5	mg/kg	23	MTG	0.0199	mg/kg	23	MTG	
Toxaphene	8001-35-2	mg/kg	3.9	MTG	0.119	mg/kg	3.9	MTG	0.0001

 Table F-1a

 Summary of PCL and TBC Concentrations for Soil and Sediment

		Soil				Sediment				
	CAS Number/			PCL				PCL		
Analyte	Abbreviation	Units	PCL	Source	TBC	Units	PCL	Source	TBC	
Inorganics										
Aluminum	7429-90-5	mg/kg		—	50	mg/kg	—	—	25500	
Antimony	7440-36-0	mg/kg	3.6	MTG	0.142	mg/kg	3.6	MTG	3	
Arsenic	7440-38-2	mg/kg	3.9	MTG	5.7	mg/kg	3.9	MTG	5.9	
Barium	7440-39-3	mg/kg	1100	MTG	1.04	mg/kg	1100	MTG	—	
Beryllium	7440-41-7	mg/kg	42	MTG	1.06	mg/kg	42	MTG	—	
Cadmium	7440-43-9	mg/kg	5	MTG	0.00222	mg/kg	5	MTG	0.583	
Calcium	7440-70-2	mg/kg	—	—	—	mg/kg	—	—	—	
Chromium (total)	7440-47-3	mg/kg	25	MTG	—	mg/kg	25	MTG	26	
Cobalt	7440-48-4	mg/kg	—	_	0.14	mg/kg	_	—	50	
Copper	7440-50-8	mg/kg	460	MTG	5.4	mg/kg	460	MTG	16	
Iron	7439-89-6	mg/kg	—	—	200	mg/kg	—	—	20000	
Lead	7439-92-1	mg/kg	400	AZDC	0.0537	mg/kg	400	AZDC	31	
Magnesium	7439-95-4	mg/kg	_	—		mg/kg	—	—	—	
Manganese	7439-96-5	mg/kg	—	—	100	mg/kg	—	—	460	
Mercury	7439-97-6	mg/kg	1.4	MTG	0.1	mg/kg	1.4	MTG	0.174	
Nickel	7440-02-0	mg/kg	86	MTG	13.6	mg/kg	86	MTG	16	
Potassium	7440-09-7	mg/kg	—	—	-	mg/kg	—	—		
Selenium	7782-49-2	mg/kg	3.4	MTG	0.52	mg/kg	3.4	MTG		
Silver	7440-22-4	mg/kg	11.2	MTG	2	mg/kg	11.2	MTG	0.5	
Sodium	7440-23-5	mg/kg	_	—		mg/kg	_	—	_	
Thallium	7440-28-0	mg/kg	1.9	MTG	0.0569	mg/kg	1.9	MTG	_	
Vanadium	7440-62-2	mg/kg	960	AZDC	1.59	mg/kg	960	AZDC	_	
Zinc	7440-66-6	mg/kg	4100	MTG	6.62	mg/kg	4100	MTG	98	

Table F-1a Summary of PCL and TBC Concentrations for Soil and Sediment

Notes:

- CAS Number, PCL, or TBC does not exist for this analyte/compound
- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements for soil or water

TBC

To Be Considered, non-promulgated advisories, guidance, or proposed standards; listed as National Ocean and Atmospheric Administration (NOAA) Screening Quick Reference Tables (SQuiRTs); 2008 version - most stringent freshwater sediment or soil levels

- mg/kg milligrams per kilogram
- DDD Dichlorodiphenyldichloroethane
- DDE Dichlorodiphenyldichloroethylene
- DDT Dichlorodiphenyltrichloroethane
- HCH Hexachlorocyclohexane

Sources:

ADEC Alaska Department of Environmental Conservation

MTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater

AZOI 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Outdoor Inhalation

AZDC 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Direct Contact

OFIG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Ingestion

OFMTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Migration to Groundwater

Assumptions:

¹ Criteria for chlordane was used for alpha-Chlordane and gamma-Chlordane

² Criteria for 1,3-Dichloropropene was used for cis-1,3-Dichloropropene and trans-1,3-Dichloropropene

³ Criteria for total DDT used for 4,4'-DDT

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 Table F-1b

 Summary of PCL and TBC Concentrations for Surface Water and Groundwater

		Surface Water				Groundwater				
	CAS Number/			PCL				PCL		
Analyte	Abbreviation	Units	PCL	Source	TBC	Units	PCL	Source	TBC	
Petroleum Hydrocarbons										
Gasoline Range Organics	GRO	mg/L	2.2	С		mg/L	2.2	С	_	
Diesel Range Organics	DRO	mg/L	1.5	С		mg/L	1.5	С	_	
Residual Range Organics	RRO	mg/L	1.1	С	—	mg/L	1.1	С	_	
Water Quality Criteria										
Total Aromatic Hydrocarbons	TAH	mg/L	0.01	А	_	_			_	
Total Aqueous Hydrocarbons	TAqH	mg/L	0.015	А	—	—				
Volatile Organic Compounds										
Acetone	67-64-1	mg/L	33	С	1.5	mg/L	33	С		
Acrolein	107-02-8	mg/L	320	A	0.00001	mg/L	320	А	—	
Acrylonitrile	107-13-1	mg/L	—	—	2.6	mg/L			0.00008	
Benzene	71-43-2	mg/L	0.005	С	0.046	mg/L	0.005	С	0.0002	
Bromobenzene	108-86-1	mg/L	—	—	_	mg/L	_	_	_	
Bromochloromethane	74-97-5	mg/L	—	—	—	mg/L			_	
Bromodichloromethane	75-27-4	mg/L	0.014	С	11	mg/L	0.014	С	0.06	
Bromoform	75-25-2	mg/L	0.11	С	0.32	mg/L	0.11	С	0.63	
Bromomethane	74-83-9	mg/L	48	А	0.016	mg/L	48	Α	_	
2-Butanone (methyl ethyl ketone)	78-93-3	mg/L	22	С	14	mg/L	22	С	6	
tert-Butylbenzene	98-06-6	mg/L	—	—	—	mg/L	_		_	
Carbon disulfide	75-15-0	mg/L	3.7	С	0.00092	mg/L	3.7	С	0.00092	
Carbon tetrachloride	56-23-5	mg/L	0.005	С	0.0098	mg/L	0.005	С	0.00001	
Chlorobenzene	108-90-7	mg/L	0.1	С	0.0013	mg/L	0.1	С	0.007	
Chloroethane	75-00-3	mg/L	0.29	С		mg/L	0.29	С	_	
2-Chloroethyl vinyl ether	110-75-8	mg/L	—	—		mg/L	_		_	
Chloroform	67-66-3	mg/L	0.14	С	0.0018	mg/L	0.14	С	0.006	
Chloromethane	74-87-3	mg/L	0.066	С		mg/L	0.066	С	_	
2-Chlorotoluene	95-49-8	mg/L	—	—		mg/L	_			
3-Chlorotoluene	108-41-8	mg/L	—	—		mg/L			_	
4-Chlorotoluene	106-43-4	mg/L	—	—		mg/L		_	_	
1,1-Dichloroethane	75-34-3	mg/L	7.3	С	0.0047	mg/L	7.3	С	0.007	
1,1-Dichloroethene	75-35-4	mg/L	0.007	С	0.025	mg/L	0.007	С	0.00001	
cis-1,2-Dichloroethene	156-59-2	mg/L	0.07	С	—	mg/L	0.07	С	_	
trans-1,2-Dichloroethene	156-60-5	mg/L	0.1	С	1.16	mg/L	0.1	С	0.1	
1,1-Dichloropropene	563-58-6	mg/L	—	—		mg/L			_	
cis-1,3-Dichloropropene ²	10061-01-5	mg/L	_	—	0.000055	mg/L	_		0.02	

Surface Water Groundwater PCL PCL CAS Number/ PCL PCL Analyte Units Source TBC Units Source TBC Abbreviation trans-1.3-Dichloropropene² 10061-02-6 0.000055 0.02 mg/L ma/L ____ ____ 1,3-Dichloropropene (total) 542-75-6 0.0085 С 0.000055 0.0085 С 0.02 mg/L mg/L 1.2-Dibromo-3-chloropropane 96-12-8 ma/L ma/L ____ 0.0002 _ ____ 0.00005 0.00005 0.0004 1.2-Dibromoethane 106-93-4 С ma/L С ma/L 1.2-Dichlorobenzene 95-50-1 ma/L 0.6 С 0.0007 0.6 С 0.003 ma/L С 1.2-Dichloroethane 107-06-2 0.005 0.1 0.005 С 0.005 mg/L mg/L 78-87-5 С С 1,2-Dichloropropane 0.005 5.7 0.005 0.00008 mg/L mg/L 1,3-Dichlorobenzene 541-73-1 mg/L 0.4 Α 0.038 mg/L 0.4 Α 0.003 142-28-9 1,3-Dichloropropane mg/L ____ _ _ mg/L ____ ____ _ С С 1.4-Dichlorobenzene 106-46-7 mg/L 0.075 0.0094 ma/L 0.075 0.003 1.4-Dioxane 123-91-1 mg/L 0.077 С ma/L 0.077 С _ ____ 2,2-Dichloropropane 594-20-7 mg/L mg/L ____ ____ Dibromochloromethane 124-48-1 mg/L 0.01 С 11 0.01 С 0.1 mg/L 74-95-3 0.37 С 0.37 С Dibromomethane ma/L 11 ma/L ____ С С Dichlorodifluoromethane 75-71-8 7.3 7.3 mg/L ____ mg/L ____ 100-41-4 С 0.0073 С Ethylbenzene mg/L 0.7 mg/L 0.7 0.004 Hexachlorobutadiene 87-68-3 mg/L 0.0073 С 0.000053 mg/L 0.0073 С 0.0006 2-Hexanone 591-78-6 0.099 mg/L _ mg/L ____ _ ____ _ 98-82-8 3.7 С 3.7 С Isopropylbenzene mg/L mg/L ____ ____ 4-Isopropyltoluene 99-87-6 mg/L _ ma/L ____ ____ 4-Methyl-2-pentanone 108-10-1 С 2.9 С mg/L 2.9 0.17 mg/L 0.00017 Methylene chloride 75-09-2 mg/L 0.005 С 0.0981 ma/L 0.005 С 0.00001 Naphthalene 91-20-3 mg/L 0.73 С 0.0011 mg/L 0.73 С 0.00001 n-Butvlbenzene 104-51-8 mg/L 0.37 С ma/L 0.37 С _ _ n-Propylbenzene 103-65-1 ma/L 0.37 С 0.37 С ____ ma/L ____ С sec-Butylbenzene 135-98-8 mg/L 0.37 С mg/L 0.37 ____ _ 100-42-5 С 0.032 0.1 С 0.006 Styrene mg/L 0.1 mg/L 1.1.1.2-Tetrachloroethane 630-20-6 mg/L ma/L ____ ____ _ ____ ____ ____ 1,1,1-Trichloroethane 71-55-6 0.2 С 0.011 0.2 С 0.00001 mg/L mg/L 79-34-5 С С 0.0043 0.0043 1.1.2.2-Tetrachloroethane mg/L 0.111 ma/L _ 1,1,2-Trichloro-1,2,2-trifluoroethane 76-13-1 1100 С 1100 С mg/L _ mg/L ____ С 1,1,2-Trichloroethane 79-00-5 mg/L 0.005 0.5 mg/L 0.005 С 0.00001 87-61-6 1.2.3-Trichlorobenzene 0.008 0.0001 mg/L _ ____ ma/L ____ ____ 1,2,3-Trichloropropane 96-18-4 0.00012 С 0.00012 С mg/L ____ mg/L _ 120-82-1 С С 1,2,4-Trichlorobenzene mg/L 0.07 0.024 mg/L 0.07 0.0001 С 1.2.4-Trimethylbenzene 95-63-6 mg/L 1.8 ____ mg/L 1.8 С ____

 Table F-1b

 Summary of PCL and TBC Concentrations for Surface Water and Groundwater

 Table F-1b

 Summary of PCL and TBC Concentrations for Surface Water and Groundwater

		Surface Water				Groundwater			
	CAS Number/	PCL					PCL		
Analyte	Abbreviation	Units	PCL	Source	TBC	Units	PCL	Source	TBC
1,3,5-Trimethylbenzene	108-67-8	mg/L	1.8	С	—	mg/L	1.8	С	—
Tetrachloroethene	127-18-4	mg/L	0.005	С	0.045	mg/L	0.005	С	0.00001
Tetrahydrofuran	109-99-9	mg/L	—	_	—	mg/L		_	0.0005
Toluene	108-88-3	mg/L	1	С	0.0098	mg/L	1	С	0.007
Trichloroethene	79-01-6	mg/L	0.005	С	0.021	mg/L	0.005	С	0.005
Trichlorofluoromethane	75-69-4	mg/L	11	С	11	mg/L	11	С	
Vinyl acetate	108-05-4	mg/L	37	С	0.016	mg/L	37	С	
Vinyl chloride	75-01-4	mg/L	0.002	С	0.93	mg/L	0.002	С	0.00001
Xylenes (total)	1330-20-7	mg/L	10	С	0.013	mg/L	10	С	0.0002
Semivolatile Organic Compounds									
Acenaphthene	83-32-9	mg/L	1.2	А	0.0058	mg/L	1.2	А	—
Acenaphthylene	208-96-8	mg/L	2.2	С	4.84	mg/L	2.2	С	—
Anthracene	120-12-7	mg/L	9.6	А	0.000012	mg/L	9.6	А	0.000007
Benzo(a)anthracene	56-55-3	mg/L	0.0012	С	0.000027	mg/L	0.0012	С	0.000001
Benzo(a)pyrene	50-32-8	mg/L	0.0002	С	0.000014	mg/L	0.0002	С	0.000005
Benzo(b)fluoranthene	205-99-2	mg/L	0.0012	С	0.00907	mg/L	0.0012	С	—
Benzo(g,h,i)perylene	191-24-2	mg/L	1.1	С	0.00764	mg/L	1.1	С	0.000003
Benzo(k)fluoranthene	207-08-9	mg/L	0.12	С	—	mg/L	0.12	С	0.0000004
Benzoic acid	65-85-0	mg/L	150	С	0.042	mg/L	150	С	
Benzyl alcohol	100-51-6	mg/L	—		0.0086	mg/L			
Benzyl butyl phthalate	85-68-7	mg/L	3	Α	0.019	mg/L	3	А	0.0029
4-Bromophenyl phenyl ether	101-55-3	mg/L	—	-	—	mg/L	—	-	—
4-Chloroaniline	106-47-8	mg/L	0.016	С	0.05	mg/L	0.016	С	0.03
bis-(2-Chloroethoxy)methane	111-91-1	mg/L	—		11	mg/L			—
bis-(2-Chloroethyl)ether	111-44-4	mg/L	0.00077	С	1.9	mg/L	0.00077	С	—
bis-(2-Chloroisopropyl)ether	108-60-1	mg/L	—		—	mg/L			—
4-Chloro-3-methyl phenol	59-50-7	mg/L	—			mg/L	_		0.35
2-Chloronaphthalene	91-58-7	mg/L	1.7	А	0.000396	mg/L	1.7	А	0.000016
2-Chlorophenol	95-57-8	mg/L	0.12	А	0.024	mg/L	0.12	А	0.0003
4-Chlorophenyl phenyl ether	7005-72-3	mg/L	—	-	—	mg/L	—	-	—
Chrysene	218-01-9	mg/L	0.12	С		mg/L	0.12	С	0.000003
Dibenzo(a,h)anthracene	53-70-3	mg/L	0.00012	С	—	mg/L	0.00012	С	—
Dibenzofuran	132-64-9	mg/L	0.073	С	0.0037	mg/L	0.073	С	
1,2-Dichlorobenzene	95-50-1	mg/L	0.6	С	0.0007	mg/L	0.6	С	0.003
1,3-Dichlorobenzene	541-73-1	mg/L	0.4	А	0.038	mg/L	0.4	А	0.003
1,4-Dichlorobenzene	106-46-7	mg/L	0.075	С	0.0094	mg/L	0.075	С	0.003

Surface Water Groundwater PCL PCL CAS Number/ PCL PCL Analyte Units Source TBC Units Source TBC Abbreviation 0.0045 3.3'-Dichlorobenzidine 91-94-1 mg/L ma/L 2.4-Dichlorophenol 120-83-2 mg/L 0.093 А 0.011 mg/L 0.093 А 0.0002 2,4-Dimethylphenol 105-67-9 mg/L 0.54 А 0.1 mg/L 0.54 А _ Diethyl phthalate 84-66-2 mg/L 23 Α 0.11 mg/L 23 0.0005 А Dimethyl phthalate 131-11-3 313 Α 0.003 ma/L 313 Α 0.0005 mg/L 2.7 0.0097 2.7 Di-n-butyl phthalate 84-74-2 ma/L А ma/L А 0.0005 С Di-n-octyl phthalate 117-84-0 1.5 С 0.003 1.5 0.0005 mg/L mg/L 2,4-Dinitrophenol 51-28-5 0.073 С 0.019 0.073 С mg/L mg/L _ 121-14-2 mg/L 0.0013 С 0.044 0.0013 С 2.4-Dinitrotoluene mg/L ____ 606-20-2 С С 2.6-Dinitrotoluene 0.0013 0.0013 mg/L mg/L _ 117-81-7 0.006 С 0.0003 0.006 С 0.0019 bis-(2-Ethylhexyl)phthalate mg/L ma/L Fluoranthene 206-44-0 mg/L 0.3 Α 0.00004 mg/L 0.3 A 0.000003 Fluorene 86-73-7 1.3 Α 0.0039 1.3 Α mg/L mg/L ___ 118-74-1 0.001 С 0.000003 0.001 С 2.10E-09 Hexachlorobenzene mg/L ma/L Hexachlorobutadiene 87-68-3 0.0073 С 0.0073 С 0.0006 mg/L 0.000053 mg/L 77-47-4 С С Hexachlorocyclopentadiene mg/L 0.05 0.0052 mg/L 0.05 0.05 Hexachloroethane 67-72-1 mg/L 0.04 С 0.008 mg/L 0.04 С Indeno(1,2,3-cd)pyrene 193-39-5 0.0012 С 0.00431 0.0012 С 0.0000004 mg/L mg/L 78-59-1 0.9 С 0.92 0.9 С Isophorone mg/L mg/L _ 534-52-1 2-Methyl-4,6-dinitrophenol ma/L 0.0134 А ____ ma/L 0.0134 А _ С 2-Methylnaphthalene 91-57-6 mg/L 0.15 С 0.33 mg/L 0.15 _ С С 2-Methylphenol (o-cresol) 95-48-7 ma/L 1.8 0.013 ma/L 1.8 0.0002 4-Methylphenol (p-cresol) 106-44-5 ma/L 0.18 С ma/L 0.18 С 0.0002 ____ Naphthalene 91-20-3 0.73 С 0.0011 0.73 С 0.00001 mg/L mg/L 2-Nitroaniline 88-74-4 mg/L ____ ____ ____ ma/L ____ ____ ____ 3-Nitroaniline 99-09-2 mg/L _ _ ____ mg/L ____ ____ ____ 4-Nitroaniline 100-01-6 mg/L _ ____ mg/L ____ _ ____ _ Nitrobenzene 98-95-3 ma/L 0.018 С 0.22 ma/L 0.018 С 2-Nitrophenol 88-75-5 mg/L mg/L _ _ ____ ____ _ ___ 4-Nitrophenol 100-02-7 ____ 0.06 ____ mg/L ____ mg/L ____ _ n-Nitrosodi-n-propylamine 621-64-7 mg/L mg/L _ ____ ____ ____ _ _ n-Nitrosodiphenylamine 86-30-6 0.17 С 0.21 0.17 С mg/L mg/L ___ 87-86-5 0.001 С 0.015 0.001 С Pentachlorophenol 0.00004 mg/L mg/L С Phenanthrene 85-01-8 11 С 0.0036 mg/L 11 0.000003 mg/L 11 С 11 Phenol 108-95-2 mg/L 0.18 mg/L С 0.0002 129-00-0 0.96 А 0.00025 0.96 А Pyrene mg/L mg/L _

 Table F-1b

 Summary of PCL and TBC Concentrations for Surface Water and Groundwater

 Table F-1b

 Summary of PCL and TBC Concentrations for Surface Water and Groundwater

		Surface Water				Groundwater			
	CAS Number/			PCL				PCL	
Analyte	Abbreviation	Units	PCL	Source	TBC	Units	PCL	Source	TBC
1,2,4-Trichlorobenzene	120-82-1	mg/L	0.07	С	0.024	mg/L	0.07	С	0.0001
2,4,5-Trichlorophenol	95-95-4	mg/L	2.6	А	0.063	mg/L	2.6	Α	0.00003
2,4,6-Trichlorophenol	88-06-2	mg/L	0.077	С	0.0049	mg/L	0.077	С	0.00003
Polychlorinated Biphenyls (PCBs)									
PCB-1016 (Aroclor 1016)	—	_	—	_					
PCB-1221 (Aroclor 1221)	—	_	—	_	—			_	_
PCB-1232 (Aroclor 1232)	—	_	—	_	—			_	_
PCB-1242 (Aroclor 1242)	—		—		—				—
PCB-1248 (Aroclor 1248)	—		—	I	—			_	—
PCB-1254 (Aroclor 1254)	—		—	I	—			_	—
PCB-1260 (Aroclor 1260)	—	1	—		—	_	_	_	—
Total PCBs	1336-36-3	mg/L	1.4E-05	А	0.000014	mg/L	1.4E-05	А	0.00001
Pesticides									
Aldrin	309-00-2	mg/L	0.00005	С	0.000017	mg/L	0.00005	С	0.000009
Chlordane (total)	57-74-9	mg/L	4.3E-06	А	2.15E-06	mg/L	4.3E-06	А	0.00002
4,4'-DDD	72-54-8	mg/L	0.0035	С	0.000011	mg/L	0.0035	С	0.000004
4,4'-DDE	72-55-9	mg/L	0.0025	С	0.105	mg/L	0.0025	С	0.000004
4,4'-DDT ⁷	50-29-3	mg/L	1E-06	А	0.0000005	mg/L	1E-06	А	0.000004
Dieldrin	60-57-1	mg/L	5.3E-05	С	0.000056	mg/L	5.3E-05	С	0.0001
Endosulfan I ⁶	959-98-8	mg/L	5.6E-05	А	0.000028	mg/L	5.6E-05	А	_
Endosulfan II ⁶	33213-65-9	mg/L	5.6E-05	А	0.000028	mg/L	5.6E-05	А	_
Endosulfan (total)	115-29-7	mg/L	—			mg/L		_	0.0002
Endosulfan sulfate	1031-07-8	mg/L	0.11	А	0.00222	mg/L	0.11	Α	—
Endrin	72-20-8	mg/L	3.6E-05	Α	0.000036	mg/L	3.6E-05	Α	0.00004
Endrin aldehyde	7421-93-4	mg/L	0.00076	А	0.00015	mg/L	0.00076	А	—
Endrin ketone	53494-70-5	mg/L	—		—	mg/L		_	—
Heptachlor	76-44-8	mg/L	3.8E-06	А	0.0000019	mg/L	3.8E-06	Α	0.000005
Heptachlor epoxide	1024-57-3	mg/L	3.8E-06	А	0.0000019	mg/L	3.8E-06	Α	0.000005
alpha-HCH	319-84-6	mg/L	0.00014	С	0.0022	mg/L	0.00014	С	0.001
beta-HCH	319-85-7	mg/L	0.00047	С	0.000495	mg/L	0.00047	С	0.001
delta-HCH	319-86-8	mg/L	—		0.0022	mg/L		_	0.001
gamma-HCH (Lindane)	58-89-9	mg/L	0.0002	С	0.00008	mg/L	0.0002	С	0.0002
Methoxychlor	72-43-5	mg/L	0.00003	Α	0.00003	mg/L	0.00003	Α	0.04
Toxaphene	8001-35-2	mg/L	2E-07	A	0.0000002	mg/L	2E-07	Α	0.003

 Table F-1b

 Summary of PCL and TBC Concentrations for Surface Water and Groundwater

		Surface Water					Grour	ndwater	
	CAS Number/			PCL				PCL	
Analyte	Abbreviation	Units	PCL	Source	TBC	Units	PCL	Source	TBC
Inorganics									
Aluminum	7429-90-5	mg/L	0.087	А	0.087	mg/L	0.087	А	0.05
Antimony	7440-36-0	mg/L	0.006	С	0.03	mg/L	0.006	С	0.006
Arsenic	7440-38-2	mg/L	0.01	С	0.15	mg/L	0.01	С	0.01
Barium	7440-39-3	mg/L	2	С	0.0039	mg/L	2	С	2
Beryllium	7440-41-7	mg/L	0.004	С	0.00066	mg/L	0.004	С	0.004
Cadmium	7440-43-9	mg/L	0.0002	A ⁴	0.00025	mg/L	0.0002	A ⁴	0.005
Calcium	7440-70-2	mg/L	_	_	_	mg/L		—	
Chromium (total)	7440-47-3	mg/L	0.1	С	_	mg/L	0.1	С	0.1
Cobalt	7440-48-4	mg/L	0.05	А	0.003	mg/L	0.05	А	
Copper	7440-50-8	mg/L	0.005	A ⁴	0.009	mg/L	0.005	A ⁴	1.3
Iron	7439-89-6	mg/L	1	А	1	mg/L	1	А	0.3
Lead	7439-92-1	mg/L	0.001	A ⁴	0.0025	mg/L	0.001	A ⁴	0.015
Magnesium	7439-95-4	mg/L	_			mg/L	_	—	
Manganese	7439-96-5	mg/L	0.05	А	0.08	mg/L	0.05	А	0.05
Mercury	7439-97-6	mg/L	0.00005	А	0.00077	mg/L	0.00005	А	0.002
Nickel	7440-02-0	mg/L	0.1	С	0.052	mg/L	0.1	С	0.02
Potassium	7440-09-7	mg/L	_		373	mg/L	_	—	
Selenium	7782-49-2	mg/L	0.005	А	0.005	mg/L	0.005	А	0.05
Silver	7440-22-4	mg/L	0.001	A^4	0.00036	mg/L	0.001	A^4	0.1
Sodium	7440-23-5	mg/L	_		_	mg/L	_	—	
Thallium	7440-28-0	mg/L	0.0017	Α	0.00003	mg/L	0.0017	A	0.002
Vanadium	7440-62-2	mg/L	0.1	А	0.019	mg/L	0.1	A	_
Zinc	7440-66-6	mg/L	0.07	A ⁴	0.12	mg/L	0.07	A ⁴	5

Table F-1b

Summary of PCL and TBC Concentrations for Surface Water and Groundwater

Notes:

- CAS Number, PCL, or TBC does not exist for this analyte/compound
- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements for soil or water

TBC

To Be Considered, non-promulgated advisories, guidance, or proposed standards; listed as National Ocean and Atmospheric Administration (NOAA) Screening Quick Reference Tables (SQuiRTs); 2008 version - most stringent fresh surface-water or groundwater levels

- mg/L milligrams per liter
- DDD Dichlorodiphenyldichloroethane
- DDE Dichlorodiphenyldichloroethylene
- DDT Dichlorodiphenyltrichloroethane
- HCH Hexachlorocyclohexane

Sources:

ADEC Alaska Department of Environmental Conservation

A 18 AAC 70.020 - Alaska Water Quality Criteria Manual (December 2008) - Fresh Water, most stringent criteria

A⁴ 18 AAC 70.020 - Alaska Water Quality Criteria Manual (December 2008) - Hardness Dependant Water Quality - Reference Appendix A

C 18 AAC 75.345 (April 2012) - Table C Groundwater Cleanup Levels

Assumptions:

- ¹ Criteria for chlordane was used for alpha-Chlordane and gamma-Chlordane
- ² Criteria for 1,3-Dichloropropene was used for cis-1,3-Dichloropropene and trans-1,3-Dichloropropene
- ⁴ Criteria is hardness dependent; a hardness value of 50 mg/L was assumed for calculations.
- ⁶ Criteria for endosulfan used for both endosulfan isomers
- ⁷ Criteria for total DDT used for 4,4'-DDT

Table F-1c
Summary of Risk-Based Screening Levels and Risk-Based Concentrations for Fish Tissue

		Fish Tissue						
				Non-				
	CAS Number/			carcinogenic	Carcinogenic			
Analyte	Abbreviation	Units	RBSL	RBC	RBC			
Polychlorinated Biphenyls (PCBs)								
PCB-1016 (Aroclor 1016)	—	µg/kg	1.31	13.1	62.4			
PCB-1221 (Aroclor 1221)	—	μg/kg	0.218	—	2.18			
PCB-1232 (Aroclor 1232)	—	μg/kg	0.218	—	2.18			
PCB-1242 (Aroclor 1242)	—	μg/kg	0.218	_	2.18			
PCB-1248 (Aroclor 1248)	—	μg/kg	0.218	—	2.18			
PCB-1254 (Aroclor 1254)	—	μg/kg	0.218	3.74	2.18			
PCB-1260 (Aroclor 1260)	—	μg/kg	0.218	_	2.18			
Total PCBs	1336-36-3	µg/kg	0.218	_	2.18			
Pesticides								
2,4'-DDD	53-19-0	μg/kg		—	—			
2,4'-DDE	3424-82-6	μg/kg		—	—			
4,4'-DDD	72-54-8	μg/kg	1.82	93.6	18.2			
4,4'-DDE	72-55-9	μg/kg	1.28	—	12.8			
4,4'-DDT	50-29-3	µg/kg	1.28		12.8			

Notes:

RBSL Risk-based screening level (used to screen results to determine what to include in the CRE)

RBC Risk-based concentration (used in the CRE to calculate individual chemical cancer risk and hazard quotient at the site)

µg/kg micrograms per kilogram

- RBSL does not exist for this compound

Note: RBSLs were calculated using the EPA's "Regional Screening Levels for Chemical Contaminants at Superfund Sites" calculator: http://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search using the following assumptions:

	RBSL	RBC
Scenario:	Fish (RSL only)	Fish (RSL only)
SL Type:	Site-specific	Site-specific
Chemical Info Type:	Database hierarchy defaults	Database hierarchy defaults
RfD/RfC Type:	Chronic	Chronic
Body weight:	70 kg (default)	70 kg (default)
Exposure duration:	30 yr (default)	30 yr (default)
Exposure frequency:	350 days/yr (default)	350 days/yr (default)
Lifetime:	70 yr (default)	70 yr (default)
Target Hazard Quotient:	0.1	1
Target Cancer Risk:	1.00E-06	1.00E-05
Fish consumption rate:	390 g/day	390 g/day

1994 E&E BH 11-1 BH 11-1 BH 11-1 BH 11-1 BH 11-1 BH 11-2 BH 11-2 PCL Analytical 94-UMT-136-SL 94-UMT-137-SL 94-UMT-138-SL 94-UMT-139-SL 94-UMT-142-SL 94-UMT-143-SL 94-UMT-135-SL Analyte Method PCL Source TBC Units OFMTG AK 101 260 _ mg/kg _ ____ ____ _ _ ____ _ Gasoline range organics AK M 8015 OFMTG <1.2 UJ <5.0 UJ 260 mg/kg <5.0 UJ <5.0 UJ <5.0 UJ <5.0 UJ <5.0 UJ ____ AK 102 OFMTG mg/kg ____ 230 _ _ ____ ____ _ _ ____ Diesel range organics AK M 8100 230 OFMTG 26 36 <13 16 22 12 14 mg/kg — Residual range AK 103 OFIG 8300 ____ mg/kg _ ____ _ ____ _ _ _ organics Corps M 8015 Diesel ____ mg/kg <10 <10 <12 <10 <10 <10 <10 _ _ Corps M 8015 Gasoline mg/kg <10 <10 <12 <10 <10 <10 <10 ____ _ _ Corps M 8015 Jet fuel mg/kg <10 <10 <12 <10 <10 <10 <10 _ _ _ Kerosene Corps M 8015 mg/kg <10 <10 <12 <10 <10 <10 <10 _ _ _ Corps M 8015 Mineral spirits mg/kg <10 <10 <10 <10 <10 <10 ____ _ _ Other Corps M 8015 mg/kg 55 67 <12 30 50 29 30 _ _ _ Total Organic EPA 415.1 mod _ _ _ mg/kg _ _ _ _ _ _ _ Carbon TRPH not listed mg/kg 42 68 76 46 26 13 19 _ _ — AK 101 0.025 MTG 0.01 mg/kg Benzene ____ _ ____ _ _ ____ _ mg/kg AK 101 6.5 MTG 0.01 Toluene ____ _ ____ ____ ____ _ ____ MTG 0.03 Ethylbenzene AK 101 6.9 mg/kg _ _ ____ _ _ _ _ 63 MTG Total Xylenes AK 101 0.1 mg/kg ____ _ _____ _____ _ ____ _

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds
1994 E&E BH 11-2 BH 11-3 BH 11-3 BH 11-3 BH 11-4 BH 11-4 BH 11-4 PCL Analytical 94-UMT-144-SL 94-UMT-146-SL 94-UMT-147-SL 94-UMT-148-SL 94-UMT-149-SL 94-UMT-150-SL 94-UMT-145-SL Analyte Method PCL Source TBC Units OFMTG AK 101 260 mg/kg _ _ ____ _ ____ ____ _ Gasoline range organics AK M 8015 OFMTG <5.0 UJ 260 mg/kg <1.2 UJ <5.0 UJ <5.0 UJ <5.0 UJ <5.0 UJ <5.0 UJ ____ AK 102 OFMTG mg/kg 230 ____ _ _ ____ ____ ____ _ ____ Diesel range organics AK M 8100 230 OFMTG mg/kg 17 19 <10 21 41 36 21 — Residual range AK 103 OFIG 8300 _ mg/kg ____ ____ _ _ _ ____ _ organics Corps M 8015 Diesel ____ mg/kg <10 <10 <10 <10 <10 <10 <10 _ _ Corps M 8015 Gasoline mg/kg <10 <10 <10 <10 <10 <10 <10 ____ _ _ Corps M 8015 Jet fuel mg/kg <10 <10 <10 <10 <10 <10 <10 _ _ _ Kerosene Corps M 8015 mg/kg <10 <10 <10 <10 <10 <10 <10 _ _ _ Corps M 8015 Mineral spirits mg/kg <10 <10 <10 <10 <10 <10 <10 _ _ _ Other Corps M 8015 mg/kg 35 34 19 42 78 76 47 _ _ _ Total Organic EPA 415.1 mod mg/kg _ _ _ _ _ ____ _ ____ ____ Carbon TRPH not listed mg/kg 21 17 34 30 17 111 39 _ _ — AK 101 0.025 MTG 0.01 mg/kg Benzene _ ___ ____ _ _ _ _ AK 101 6.5 MTG 0.01 mg/kg Toluene ____ ___ ____ ____ ____ _ ____ MTG 0.03 mg/kg Ethylbenzene AK 101 6.9 _ ___ ____ _ _ ____ _ 63 MTG Total Xylenes AK 101 0.1 mg/kg _ _ ____ _____ ____ ____ ____

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds

1994 E&E BH 11-5 BH 11-5 BH 11-5 BH 11-6 BH 11-6 BH 11-6 BH 11-6 PCL Analytical 94-UMT-151-SL 94-UMT-152-SL 94-UMT-153-SL 94-UMT-154-SL 94-UMT-155-SL 94-UMT-156-SL 94-UMT-157-SL Analyte Method PCL Source TBC Units OFMTG AK 101 260 mg/kg _ _ ____ _ ____ ____ _ Gasoline range organics AK M 8015 OFMTG <5.0 UJ 260 mg/kg <5.0 UJ <5.0 UJ <5.0 UJ <5.0 UJ <5.0 UJ <1.1 UJ _ AK 102 OFMTG mg/kg 230 _ _ _ ____ ____ ____ _ ____ Diesel range organics AK M 8100 230 OFMTG mg/kg 12 <10 10 30 19 40 18 — Residual range AK 103 OFIG 8300 _ mg/kg ____ ____ _ _ _ ____ _ organics Corps M 8015 Diesel ____ mg/kg <10 <10 <10 <10 <10 <10 <11 _ _ Corps M 8015 Gasoline mg/kg <10 <10 <10 <10 <10 <10 <11 ____ _ _ Corps M 8015 Jet fuel mg/kg <10 <10 <10 <10 <10 <10 <11 _ _ _ Kerosene Corps M 8015 mg/kg <10 <10 <10 <10 <10 <10 <11 _ _ _ Corps M 8015 Mineral spirits mg/kg <10 <10 <10 <10 <10 <10 _ _ _ Other Corps M 8015 mg/kg 25 <20 23 71 34 97 <11 _ _ _ Total Organic EPA 415.1 mod mg/kg _ _ _ _ _ ____ _ _ ____ _ Carbon TRPH not listed mg/kg 48 39 37 26 25 11 42 _ _ — AK 101 0.025 MTG 0.01 mg/kg Benzene _ _ ____ _ _ _ _ AK 101 6.5 MTG 0.01 mg/kg Toluene ____ ___ ____ ____ ____ _ ____ MTG 0.03 mg/kg Ethylbenzene AK 101 6.9 _ ___ ____ _ _ ____ _ 63 MTG Total Xylenes AK 101 0.1 mg/kg _ _ ____ _____ ____ ____ ____

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds

1994 E&E 1996 E&E 1996 E&E 1996 E&E 1996 E&E 1996 E&E 1996 E&E BH 11-6 MW-3 MW-3 MW-3 MW-4 MW-4 MW-5 PCL Analytical 94-UMT-158-SL 96-UMT-196-SB 96-UMT-201-SS 96-UMT-202-SB 96-UMT-208-SB 96-UMT-195-SS 96-UMT-197-SB Analyte Method PCL Source TBC Units OFMTG AK 101 260 <5.7 UJK <5.5 UJK _ mg/kg _ <6.2 UJK <5.4 UJK <5.2 UJK <5.6 UJK Gasoline range organics AK M 8015 OFMTG 260 mg/kg <5.0 UJ _ _ _ _ ____ ____ _ AK 102 OFMTG <4.4 UJK <4.5 UJK <4.1 UJK <4.5 UJK 230 11 JK <4.4 UJK ____ mg/kg ____ Diesel range organics AK M 8100 230 OFMTG 44 mg/kg — _ ____ _ _ ____ _ Residual range AK 103 OFIG 8300 _ mg/kg 73 JK <44 UJK 19 JK 20 JK <45 UJK <44 UJK _ organics Corps M 8015 Diesel mg/kg <10 ____ _ _ _ _ ____ _ _ _ Corps M 8015 Gasoline mg/kg <10 _ _ _ ____ _ _ _ _ _ Corps M 8015 Jet fuel mg/kg <10 _ _ _ ____ _ _ ____ ____ _ Kerosene Corps M 8015 mg/kg <10 _ _ _ _ ____ _ _ ____ _ Mineral spirits Corps M 8015 mg/kg <10 _ _ _ _ _ _ _ _ _ Other Corps M 8015 mg/kg _ 111 _ ____ _ _ ____ ____ _ ____ Total Organic EPA 415.1 mod 5550 JK 7080 JK _ _ _ mg/kg _ _ ____ _ _ Carbon TRPH mg/kg not listed 48 ____ _ _ _ ____ _ _ _ _ AK 101 0.025 MTG 0.01 mg/kg <0.099 UJK <0.087 UJK <0.091 UJK < 0.083 <0.090 < 0.089 Benzene _ MTG 0.01 mg/kg Toluene AK 101 6.5 ____ <0.15 UJK <0.13 UJK <0.14 UJK < 0.12 < 0.14 < 0.13 0.03 mg/kg Ethylbenzene AK 101 6.9 MTG <0.11 UJK <0.098 UJK <0.10 UJK < 0.093 <0.10 <0.10 _ 63 MTG <0.27 UJK <0.28 UJK <0.28 Total Xylenes AK 101 0.1 mg/kg <0.31 UJK < 0.26 < 0.28 ____

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds

1996 E&E MW-6 MW-6 MW-6 MW-7 MW-7 MW-8 SB-44 PCL Analytical 96-UMT-203-SB 96-UMT-205-SB 96-UMT-199-SB 96-UMT-204-SB 96-UMT-209-SS 96-UMT-210-SB 96-UMT-211-SB Analyte Method PCL Source TBC Units OFMTG AK 101 260 <5.1 UJK <5.2 UJK _ mg/kg 10 JK 10 JK <5.2 UJK <5.8 UJK <5.2 UJK Gasoline range organics AK M 8015 OFMTG 260 mg/kg _ ____ ____ ____ _ ____ ____ _ AK 102 OFMTG <4.1 UJK 1300 JK <4.6 UJK <4.2 UJK 230 1200 JK 5.2 JK <4.1 UJK ____ mg/kg Diesel range organics AK M 8100 230 OFMTG mg/kg — _ ____ ____ — _ ____ _ Residual range AK 103 OFIG 8300 _ mg/kg 15 JK 4000 JK 4100 JK <100 UJK <120 UJK <42 UJK <41 UJK organics Corps M 8015 Diesel mg/kg ____ _ _ _ _ _ _ _ _ _ Corps M 8015 Gasoline mg/kg _ _ _ ____ _ _ _ _ _ _ Corps M 8015 Jet fuel mg/kg _ _ _ ____ _ _ ____ _ ____ _ Kerosene Corps M 8015 mg/kg _ _ _ _ _ ____ _ _ ____ _ Mineral spirits Corps M 8015 mg/kg _ _ _ _ _ _ ____ _ ____ _ Other Corps M 8015 mg/kg _ ____ _ ____ _ ____ ____ _ _ ____ Total Organic EPA 415.1 mod _ _ _ mg/kg _ ____ _ ____ _ ____ Carbon TRPH mg/kg not listed _ _ _ _ _ _ _ _ _ _ AK 101 0.025 MTG 0.01 mg/kg < 0.082 < 0.082 < 0.083 <0.093 UJK <0.083 UJK <0.083 UJK Benzene < 0.083 MTG mg/kg Toluene AK 101 6.5 0.01 < 0.12 < 0.12 < 0.12 < 0.12 <0.14 UJK <0.12 UJK <0.12 UJK mg/kg < 0.092 <0.093 Ethylbenzene AK 101 6.9 MTG 0.03 < 0.092 < 0.093 <0.10 UJK <0.093 UJK <0.093 UJK 63 MTG <0.26 <0.26 <0.29 UJK <0.26 UJK <0.26 UJK Total Xylenes AK 101 0.1 mg/kg < 0.25 < 0.26

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds

						1996 E&E						
	Analytical		PCI			SB-45	SB-47	SB-47	SB-49	SB-50	SB-50	SB-51
Analyte	Method	PCL	Source	твс	Units	96-UMT-200-SB	96-UMT-207-SB	96-UMT-401-SS	96-UMT-212-SB	96-UMT-213-SS	96-UMT-214-SB	96-UMT-215-SB
Gasoline range	AK 101	260	OFMTG		mg/kg	19 JK	<5.2 UJK		<5.3 UJK	<6.0 UJK	<5.3 UJK	<5.5 UJK
organics	AK M 8015	260	OFMTG		mg/kg	—	—	—	_	_	—	—
Diesel range	AK 102	230	OFMTG		mg/kg	<4.2 UJK	<4.2 UJK	5.2 JK	<4.3 UJK	8.8 JK	5.1 JK	<4.4 UJK
organics	AK M 8100	230	OFMTG		mg/kg	_	—	—	_	_	_	—
Residual range organics	AK 103	8300	OFIG	_	mg/kg	<42 UJK	<42 UJK	24 JK	<43 UJK	<120 UJK	<110 UJK	<44 UJK
Diesel	Corps M 8015		-		mg/kg	—	—	—	_	_	—	—
Gasoline	Corps M 8015	_	-		mg/kg	_	—	—	_	_	_	—
Jet fuel	Corps M 8015	_	-		mg/kg	—	—	—	_	_	_	—
Kerosene	Corps M 8015		_		mg/kg	—	—	—	_	_	_	—
Mineral spirits	Corps M 8015		_	_	mg/kg	_	—	—	_	_	_	—
Other	Corps M 8015		_	_	mg/kg	_	—	—	_	_	_	—
Total Organic Carbon	EPA 415.1 mod	_	_	_	mg/kg	_	_	_	_	_	_	_
TRPH	not listed		-		mg/kg	—	—	—	_	—	_	—
Benzene	AK 101	0.025	MTG	0.01	mg/kg	<0.083 UJK	<0.084	—	<0.085 UJK	<0.096 UJK	<0.085 UJK	<0.088 UJK
Toluene	AK 101	6.5	MTG	0.01	mg/kg	<0.13 UJK	<0.13	—	<0.13 UJK	<0.14 UJK	<0.13 UJK	0.50 JK
Ethylbenzene	AK 101	6.9	MTG	0.03	mg/kg	<0.094 UJK	<0.094	—	<0.096 UJK	<0.11 UJK	<0.095 UJK	<0.099 UJK
Total Xylenes	AK 101	63	MTG	0.1	mg/kg	<0.26 UJK	<0.26	—	<0.27 UJK	<0.30 UJK	<0.26 UJK	0.22 JK

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds

 Table F-2a

 Summary of Soil Sample Results - Fuels and Fuel-related Compounds

						1997 E&E						
Analyte	Analytical Method	PCL	PCL Source	твс	Units	SB-182 97-UMT-117-SB	SB-183 97-UMT-118-SB	SB-184 97-UMT-120-SB	SB-185 97-UMT-121-SB	SB-186 97-UMT-122-SB	SB-186 97-UMT-123-SB	SB-187 97-UMT-125-SB
Gasoline range	AK 101	260	OFMTG	—	mg/kg	—	—	—	—	—	—	—
organics	AK M 8015	260	OFMTG	—	mg/kg	—	—	_	—	_	_	_
Diesel range	AK 102	230	OFMTG	—	mg/kg	13	8.8	<4.6	9.0	12 J	<4.2	14
organics	AK M 8100	230	OFMTG	—	mg/kg	—	—	_	—	_	_	—
Residual range organics	AK 103	8300	OFIG	_	mg/kg	_	_	_	—	_	_	_
Diesel	Corps M 8015	_	—	—	mg/kg	—	—	_	—	_	_	—
Gasoline	Corps M 8015		_	—	mg/kg		—	_	—	_	_	—
Jet fuel	Corps M 8015		_	—	mg/kg		—	_		_	_	—
Kerosene	Corps M 8015	_	—	—	mg/kg		—	_	—	_	_	—
Mineral spirits	Corps M 8015			_	mg/kg	_	—	_	_	_	_	—
Other	Corps M 8015			_	mg/kg	_	—	_	_	_	_	—
Total Organic Carbon	EPA 415.1 mod	_	_	_	mg/kg	_	_	_	_	_	_	_
TRPH	not listed	_	—	—	mg/kg	—	—	_	—	_	_	—
Benzene	AK 101	0.025	MTG	0.01	mg/kg	—	—	_	_	_	_	—
Toluene	AK 101	6.5	MTG	0.01	mg/kg	—	—	—	—	—	_	—
Ethylbenzene	AK 101	6.9	MTG	0.03	mg/kg	_	—	—	—	—	—	—
Total Xylenes	AK 101	63	MTG	0.1	mg/kg		—	_	—	_	_	—

Table F-2a Summary of Soil Sample Results - Fuels and Fuel-related Compounds

Notes:

Column

U, J, K Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

neadings:	Event
	Location (LOCID)
	Sample ID

PCL Chemical-specific Applicable or Relevant and Appropriate Requirements

TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards

mg/kg milligrams per kilogram

ADEC Alaska Department of Environmental Conservation

MTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater

OFIG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Ingestion

OFMTG 18 AAC 75.341 (April 2012) - Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Migration to Groundwater

< Result is less than the listed reporting limit

bold Result or reporting limit exceeds the PCL

bold shaded Result exceeds PCL (regulatory exceedance)

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
	Analytical		BCI			BH 11-1	BH 11-2	BH 11-2				
Analyte	Method	PCL	Source	твс	Units	94-UMT-135-SL	94-UMT-136-SL	94-UMT-137-SL	94-UMT-138-SL	94-UMT-139-SL	94-UMT-142-SL	94-UMT-143-SL
	AK 101	0.025	MTG	0.01	mg/kg	—	—	—	—	—	—	—
Benzene	SW8260	0.025	MTG	0.01	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
Taluana	AK 101	6.5	MTG	0.01	mg/kg	_	_	_	_	_	_	_
loiuene	SW8260	6.5	MTG	0.01	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
Ethe dha a sea a s	AK 101	6.9	MTG	0.03	mg/kg	_	_	_	_	_	_	_
Ethylbenzene	SW8260	6.9	MTG	0.03	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
Yulanaa (tatal)	AK 101	63	MTG	0.1	mg/kg	—	—	—		_	_	_
Aylenes (total)	SW8260	63	MTG	0.1	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
1,1,1-Trichloroethane	SW8260	0.82	MTG	0.07	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
1,2,4-Trimethylbenzene	SW8260	23	MTG	_	mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
1,2-Dichloroethane	SW8260	0.016	MTG	0.02	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
1,3,5-Trimethylbenzene	SW8260	23	MTG	_	mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
2-Butanone	SW8260	59	MTG	89.6	mg/kg	<0.020 UJ	<0.020 UJ	<0.012 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
4-Isopropyltoluene	SW8260	—	—	_	mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
Acetone	SW8260	88	MTG	2.5	mg/kg	<0.050 UJ	<0.050 UJ	<0.012 UJ	<0.050 UJ	<0.050 UJ	<0.050 UJ	<0.050 UJ
Chlorobenzene	SW8260	0.63	MTG	0.03	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
Chloroform	SW8260	0.46	MTG	1.19	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
Chloromethane	SW8260	0.21	MTG	10.4	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
Isopropylbenzene	SW8260	51	MTG	_	mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
Methylene chloride	SW8260	0.016	MTG	0.4	mg/kg	0.011 J	<0.010 UJ	<0.0062 UJ	<0.010 UJ	<0.010 UJ	<0.010 UJ	<0.010 UJ
Naphthalene	SW8260	20	MTG	0.0994	mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
n-Butylbenzene	SW8260	15	MTG		mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
n-Propylbenzene	SW8260	15	MTG		mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
sec-Butylbenzene	SW8260	12	MTG	—	mg/kg	<0.020 UJ	<0.020 UJ	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
Trichlorofluoromethane	SW8260	86	MTG	16.4	mg/kg	<0.0050 UJ	<0.0050 UJ	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ
1,1,1,2-Tetrachloroethane	SW8260	—	—	225	mg/kg	—	—	—	—	—		
1,1,2,2-Tetrachloroethane	SW8260	0.017	MTG	0.127	mg/kg	—	—	—	—	—	—	—
1,1,2-Trichloroethane	SW8260	0.018	MTG	0.4	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethane	SW8260	25	MTG	0.02	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethene	SW8260	0.03	MTG	0.1	mg/kg	—	-	-	—	—	—	—

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
	Applytical		PCI			BH 11-1	BH 11-2	BH 11-2				
Analyte	Method	PCL	Source	твс	Units	94-UMT-135-SL	94-UMT-136-SL	94-UMT-137-SL	94-UMT-138-SL	94-UMT-139-SL	94-UMT-142-SL	94-UMT-143-SL
1,1-Dichloropropene	SW8260	—	—	—	mg/kg	—	—	—	—	—	—	—
1,2,3-Trichlorobenzene	SW8260	—	—	0.03	mg/kg		—	—	—	—	—	—
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg		—	—	—	—	—	—
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg			_	—	_	_	_
1,2-Dibromo-3-chloropropane	SW8260	—	—	0.0352	mg/kg	_	_	_	—	_	_	_
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg	_	_	_	—	_	_	_
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg	_	_	_	—	_	_	_
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg		_	_	_	_	_	_
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg	_	_	_	_	_	_	_
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg		_	—	—	—	—	_
2,2-Dichloropropane	SW8260	—	—	—	mg/kg		_	—	—	—	—	_
2-Chlorotoluene	SW8260	—	—	—	mg/kg		_	—	—	—	—	_
2-Hexanone	SW8260	—	—	12.6	mg/kg		_	_	_	_	_	_
4-Chlorotoluene	SW8260	—	—	-	mg/kg		_	_	_	_	_	_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg	_	_	_	_	_	_	_
Bromobenzene	SW8260	—	—	—	mg/kg		_	—	—	—	—	_
Bromochloromethane	SW8260	—	—	—	mg/kg		_	—	—	—	—	_
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg	_	_	_	—	_	_	_
Bromoform	SW8260	0.34	MTG	15.9	mg/kg		_	_	_	_	_	_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg			_	—	_	_	_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg		_	_	_	_	_	_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg	_	_	—	—	—	—	_
Chloroethane	SW8260	34	AZOI	—	mg/kg			—	_	_	—	
cis-1,2-Dichloroethene	SW8260	0.24	MTG	—	mg/kg	_	_	_	—	_	_	_
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg		_	_	_	_	_	_
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg		_	_	_	_	_	_
Dibromomethane	SW8260	1.1	MTG	65	mg/kg	_	_	—	—	—	—	_
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg	—	—	—	-	—	-	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg	—	—	—	-	—	—	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg	—	—	-	-	—	-	—

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
Analyte	Analytical Method	PCL	PCL Source	твс	Units	BH 11-1 94-UMT-135-SL	BH 11-1 94-UMT-136-SL	BH 11-1 94-UMT-137-SL	BH 11-1 94-UMT-138-SL	BH 11-1 94-UMT-139-SL	BH 11-2 94-UMT-142-SL	BH 11-2 94-UMT-143-SL
o-Xylene	SW8260	63	MTG	0.1	mg/kg	—	_	—	_	—		—
Styrene	SW8260	0.96	MTG	0.3	mg/kg	—		_	—	_	—	_
tert-Butylbenzene	SW8260	12	MTG	-	mg/kg	_	_	_	_			_
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	_	_	_			_
trans-1,2-Dichloroethene	SW8260	0.37	MTG	_	mg/kg	_		_		_		_
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_		_	_	_	_	_
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	_		_	_	_	_	_
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	—	_	—	—	_	_	—

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
	Analytical		DCI			BH 11-2	BH 11-3	BH 11-3	BH 11-3	BH 11-4	BH 11-4	BH 11-4
Analyte	Method	PCL	Source	твс	Units	94-UMT-144-SL	94-UMT-145-SL	94-UMT-146-SL	94-UMT-147-SL	94-UMT-148-SL	94-UMT-149-SL	94-UMT-150-SL
Demonstra	AK 101	0.025	MTG	0.01	mg/kg	—	—	_	_	—	_	—
Benzene	SW8260	0.025	MTG	0.01	mg/kg	<0.0062 UJ	<0.0050 UJ					
Taluana	AK 101	6.5	MTG	0.01	mg/kg	_	—			_		_
loiuene	SW8260	6.5	MTG	0.01	mg/kg	<0.0062 UJ	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	0.0080 J	<0.0050 UJ	<0.0050 UJ
Edu dha a sa sa s	AK 101	6.9	MTG	0.03	mg/kg	_	—	—		—	—	
Etnylbenzene	SW8260	6.9	MTG	0.03	mg/kg	<0.0062 UJ	<0.0050 UJ					
Vulence (total)	AK 101	63	MTG	0.1	mg/kg	_	—			_		_
Aylenes (total)	SW8260	63	MTG	0.1	mg/kg	<0.0062 UJ	<0.0050 UJ					
1,1,1-Trichloroethane	SW8260	0.82	MTG	0.07	mg/kg	<0.0062 UJ	<0.0050 UJ					
1,2,4-Trimethylbenzene	SW8260	23	MTG	_	mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
1,2-Dichloroethane	SW8260	0.016	MTG	0.02	mg/kg	<0.0062 UJ	<0.0050 UJ					
1,3,5-Trimethylbenzene	SW8260	23	MTG	—	mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
2-Butanone	SW8260	59	MTG	89.6	mg/kg	<0.012 UJ	<0.020 UJ					
4-Isopropyltoluene	SW8260	—	—	_	mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
Acetone	SW8260	88	MTG	2.5	mg/kg	<0.012 UJ	<0.050 UJ					
Chlorobenzene	SW8260	0.63	MTG	0.03	mg/kg	<0.0062 UJ	<0.0050 UJ					
Chloroform	SW8260	0.46	MTG	1.19	mg/kg	<0.0062 UJ	<0.0050 UJ					
Chloromethane	SW8260	0.21	MTG	10.4	mg/kg	<0.0062 UJ	<0.0050 UJ					
Isopropylbenzene	SW8260	51	MTG		mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
Methylene chloride	SW8260	0.016	MTG	0.4	mg/kg	<0.0062 UJ	<0.010 UJ	<0.010 UJ	<0.010 UJ	0.019 J	0.011 J	0.011 J
Naphthalene	SW8260	20	MTG	0.0994	mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
n-Butylbenzene	SW8260	15	MTG		mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
n-Propylbenzene	SW8260	15	MTG		mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
sec-Butylbenzene	SW8260	12	MTG		mg/kg	<0.0062 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ	<0.020 UJ
Trichlorofluoromethane	SW8260	86	MTG	16.4	mg/kg	<0.0062 UJ	<0.0050 UJ					
1,1,1,2-Tetrachloroethane	SW8260	_	—	225	mg/kg	—	—	—	—	—	—	_
1,1,2,2-Tetrachloroethane	SW8260	0.017	MTG	0.127	mg/kg	—	—	—	—	—	—	—
1,1,2-Trichloroethane	SW8260	0.018	MTG	0.4	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethane	SW8260	25	MTG	0.02	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethene	SW8260	0.03	MTG	0.1	mg/kg	—	-	—	—	—	—	—

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
	A		DOL			BH 11-2	BH 11-3	BH 11-3	BH 11-3	BH 11-4	BH 11-4	BH 11-4
Analyte	Method	PCL	Source	твс	Units	94-UMT-144-SL	94-UMT-145-SL	94-UMT-146-SL	94-UMT-147-SL	94-UMT-148-SL	94-UMT-149-SL	94-UMT-150-SL
1,1-Dichloropropene	SW8260	—	_	—	mg/kg	—	—	—	—	—	—	—
1,2,3-Trichlorobenzene	SW8260	_	—	0.03	mg/kg	—	—	—	—	—	—	—
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg	—	—	—	—	—	—	—
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg	—	—	—	—	—	—	—
1,2-Dibromo-3-chloropropane	SW8260	_	—	0.0352	mg/kg	_	—	—	—	—	—	—
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg	_	—	—	—	—	—	—
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg	_	_	_	_	_	_	_
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg	_	_	_	_	_	_	_
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg	_		_	_	_	_	_
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg	_	_	—	—	—	—	_
2,2-Dichloropropane	SW8260		—	—	mg/kg	_	_	—	—	—	—	
2-Chlorotoluene	SW8260		—	—	mg/kg	_	_	—	—	—	—	_
2-Hexanone	SW8260		—	12.6	mg/kg	_	_	—	—	_	—	_
4-Chlorotoluene	SW8260		—	-	mg/kg	_	_	_	_	_	_	_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg	_	_	_	_	_	_	_
Bromobenzene	SW8260		—	—	mg/kg	_	_	—	—	—	—	
Bromochloromethane	SW8260		—	—	mg/kg	_	_	—	—	—	—	
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg	_	_	—	—	—	—	
Bromoform	SW8260	0.34	MTG	15.9	mg/kg	—	_	—	—	_	—	_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg	—	_	—	—	_	—	_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg	_	_	_	_	_	_	_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg	_	_	—	—	—	—	_
Chloroethane	SW8260	34	AZOI	—	mg/kg	_	_	—	—	—	—	
cis-1,2-Dichloroethene	SW8260	0.24	MTG	—	mg/kg	_	_	—	—	—	—	_
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	—	_	—	—	_	—	_
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg	—	_	—	—	_	—	_
Dibromomethane	SW8260	1.1	MTG	65	mg/kg	_	_	—	—	—	—	_
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg	_	_	—	—	—	—	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg	_	_	—	—	—	—	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg	—	—	—	—	—	—	—

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
Analyte	Analytical Method	PCL	PCL Source	твс	Units	BH 11-2 94-UMT-144-SL	BH 11-3 94-UMT-145-SL	BH 11-3 94-UMT-146-SL	BH 11-3 94-UMT-147-SL	BH 11-4 94-UMT-148-SL	BH 11-4 94-UMT-149-SL	BH 11-4 94-UMT-150-SL
o-Xylene	SW8260	63	MTG	0.1	mg/kg	_	_		_	_		—
Styrene	SW8260	0.96	MTG	0.3	mg/kg	—	_		—	_		—
tert-Butylbenzene	SW8260	12	MTG	-	mg/kg	_	_		_	_		_
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	_		_	_		_
trans-1,2-Dichloroethene	SW8260	0.37	MTG	-	mg/kg	_	_		_	_		_
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_	_		_	_		_
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	_	_	_	_	_	_	_
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	_	_	_	_	_	_	_

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
	Analytical		BCI			BH 11-5	BH 11-5	BH 11-5	BH 11-6	BH 11-6	BH 11-6	BH 11-6
Analyte	Method	PCL	Source	твс	Units	94-UMT-151-SL	94-UMT-152-SL	94-UMT-153-SL	94-UMT-154-SL	94-UMT-155-SL	94-UMT-156-SL	94-UMT-157-SL
	AK 101	0.025	MTG	0.01	mg/kg	_	—	—	—	—	—	—
Benzene	SW8260	0.025	MTG	0.01	mg/kg	<0.0050 UJ	<0.0053 UJ					
-	AK 101	6.5	MTG	0.01	mg/kg	_	—	—	_	—	—	_
loluene	SW8260	6.5	MTG	0.01	mg/kg	<0.0050 UJ	<0.0053 UJ					
	AK 101	6.9	MTG	0.03	mg/kg	_	_		_	_		_
Ethylbenzene	SW8260	6.9	MTG	0.03	mg/kg	<0.0050 UJ	<0.0053 UJ					
	AK 101	63	MTG	0.1	mg/kg	_	_	_	_	_	_	_
Xylenes (total)	SW8260	63	MTG	0.1	mg/kg	<0.0050 UJ	<0.0050 UJ	0.0050 J	<0.0050 UJ	<0.0050 UJ	<0.0050 UJ	<0.0053 UJ
1,1,1-Trichloroethane	SW8260	0.82	MTG	0.07	mg/kg	<0.0050 UJ	<0.0053 UJ					
1,2,4-Trimethylbenzene	SW8260	23	MTG	-	mg/kg	<0.020 UJ	<0.0053 UJ					
1,2-Dichloroethane	SW8260	0.016	MTG	0.02	mg/kg	<0.0050 UJ	<0.0053 UJ					
1,3,5-Trimethylbenzene	SW8260	23	MTG	—	mg/kg	<0.020 UJ	<0.0053 UJ					
2-Butanone	SW8260	59	MTG	89.6	mg/kg	<0.020 UJ	<0.011 UJ					
4-Isopropyltoluene	SW8260	—	—	-	mg/kg	<0.020 UJ	<0.0053 UJ					
Acetone	SW8260	88	MTG	2.5	mg/kg	<0.050 UJ	<0.011 UJ					
Chlorobenzene	SW8260	0.63	MTG	0.03	mg/kg	<0.0050 UJ	<0.0053 UJ					
Chloroform	SW8260	0.46	MTG	1.19	mg/kg	<0.0050 UJ	<0.0053 UJ					
Chloromethane	SW8260	0.21	MTG	10.4	mg/kg	<0.0050 UJ	<0.0053 UJ					
Isopropylbenzene	SW8260	51	MTG	-	mg/kg	<0.020 UJ	<0.0053 UJ					
Methylene chloride	SW8260	0.016	MTG	0.4	mg/kg	<0.010 UJ	<0.0060 UJ					
Naphthalene	SW8260	20	MTG	0.0994	mg/kg	<0.020 UJ	<0.0053 UJ					
n-Butylbenzene	SW8260	15	MTG	—	mg/kg	<0.020 UJ	<0.0053 UJ					
n-Propylbenzene	SW8260	15	MTG	-	mg/kg	<0.020 UJ	<0.0053 UJ					
sec-Butylbenzene	SW8260	12	MTG	-	mg/kg	<0.020 UJ	<0.0053 UJ					
Trichlorofluoromethane	SW8260	86	MTG	16.4	mg/kg	<0.0050 UJ	<0.0053 UJ					
1,1,1,2-Tetrachloroethane	SW8260	_	—	225	mg/kg	—	—	—	—	—	—	—
1,1,2,2-Tetrachloroethane	SW8260	0.017	MTG	0.127	mg/kg	—	—	—	—	—	—	—
1,1,2-Trichloroethane	SW8260	0.018	MTG	0.4	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethane	SW8260	25	MTG	0.02	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethene	SW8260	0.03	MTG	0.1	mg/kg	—	—	—	—	—	—	—

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
	Analytical		BCI			BH 11-5	BH 11-5	BH 11-5	BH 11-6	BH 11-6	BH 11-6	BH 11-6
Analyte	Method	PCL	Source	твс	Units	94-UMT-151-SL	94-UMT-152-SL	94-UMT-153-SL	94-UMT-154-SL	94-UMT-155-SL	94-UMT-156-SL	94-UMT-157-SL
1,1-Dichloropropene	SW8260		—	—	mg/kg	—	—	—	—	—	—	—
1,2,3-Trichlorobenzene	SW8260	—	—	0.03	mg/kg				_	_		_
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg				_	_		_
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg				_	_		_
1,2-Dibromo-3-chloropropane	SW8260	—	—	0.0352	mg/kg	_	_			—		_
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg		_	_	_	_	_	_
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg	_	_			—		_
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg		_		_	_		_
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg		_		_	_		_
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg	_	_			—		_
2,2-Dichloropropane	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
2-Chlorotoluene	SW8260	—	—	—	mg/kg	_	_			—		_
2-Hexanone	SW8260	—	—	12.6	mg/kg		_		_	_		_
4-Chlorotoluene	SW8260	—	—	-	mg/kg		_		_	_		_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg				_	_		_
Bromobenzene	SW8260	—	—	—	mg/kg	_	_			—		_
Bromochloromethane	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg		_	_	_	_	_	_
Bromoform	SW8260	0.34	MTG	15.9	mg/kg	_	_			—		_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg		_		_	_		_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg		_		_	_		_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg	_	_			—		_
Chloroethane	SW8260	34	AZOI	—	mg/kg	_	_			—		_
cis-1,2-Dichloroethene	SW8260	0.24	MTG	—	mg/kg					_		
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg		_		_	_		_
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg		_		_	_		_
Dibromomethane	SW8260	1.1	MTG	65	mg/kg		_	_	_	—	_	—
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg		_	_	—	—	_	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg		_	_	—	—	_	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg		—	—	—	—	—	—

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E						
Analyte	Analytical Method	PCL	PCL Source	твс	Units	BH 11-5 94-UMT-151-SL	BH 11-5 94-UMT-152-SL	BH 11-5 94-UMT-153-SL	BH 11-6 94-UMT-154-SL	BH 11-6 94-UMT-155-SL	BH 11-6 94-UMT-156-SL	BH 11-6 94-UMT-157-SL
o-Xylene	SW8260	63	MTG	0.1	mg/kg	_	_	—	_	_		—
Styrene	SW8260	0.96	MTG	0.3	mg/kg	—	_	_	—	_		—
tert-Butylbenzene	SW8260	12	MTG	-	mg/kg	_	_	_	_	_		_
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	_	_	_	_		_
trans-1,2-Dichloroethene	SW8260	0.37	MTG		mg/kg	_	_	_	_	_		_
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_	_	_	_	_		_
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	_	_	_	_	_		_
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	_	_	_	_	_	_	_

						1994 E&E	1996 AGRA	1996 AGRA	1996 E&E	1996 E&E	1996 E&E	1996 E&E
	Analytical		BCI			BH 11-6	_	_	MW-3	MW-3	MW-3	MW-4
Analyte	Method	PCL	Source	TBC	Units	94-UMT-158-SL	1639-06	1639-08	96-UMT-195-SS	96-UMT-196-SB	96-UMT-197-SB	96-UMT-201-SS
Devenue	AK 101	0.025	MTG	0.01	mg/kg	_		_	<0.099 UJK	<0.087 UJK	<0.091 UJK	<0.083
Benzene	SW8260	0.025	MTG	0.01	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_	_	_
Taluana	AK 101	6.5	MTG	0.01	mg/kg			—	<0.15 UJK	<0.13 UJK	<0.14 UJK	<0.12
loluene	SW8260	6.5	MTG	0.01	mg/kg	<0.0050 UJ	<0.10	<0.10	0.00176 B	<0.00524	<0.00555	<0.00505
Ethudh an ean a	AK 101	6.9	MTG	0.03	mg/kg		—	—	<0.11 UJK	<0.098 UJK	<0.10 UJK	<0.093
Ethylbenzene	SW8260	6.9	MTG	0.03	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_	—	_
Vulance (total)	AK 101	63	MTG	0.1	mg/kg			—	<0.31 UJK	<0.27 UJK	<0.28 UJK	<0.26
Ayleries (total)	SW8260	63	MTG	0.1	mg/kg	<0.0050 UJ		—	<0.00619	<0.00524	<0.00555	<0.00505
1,1,1-Trichloroethane	SW8260	0.82	MTG	0.07	mg/kg	<0.0050 UJ	<0.10	<0.10	—	_	_	_
1,2,4-Trimethylbenzene	SW8260	23	MTG		mg/kg	<0.020 UJ	<0.10	<0.10	_	_	—	_
1,2-Dichloroethane	SW8260	0.016	MTG	0.02	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_	_	_
1,3,5-Trimethylbenzene	SW8260	23	MTG	—	mg/kg	<0.020 UJ	<0.10	<0.10	_	_	_	_
2-Butanone	SW8260	59	MTG	89.6	mg/kg	<0.020 UJ	<1.0	<1.0	_	_	_	_
4-Isopropyltoluene	SW8260		—		mg/kg	<0.020 UJ	<0.10	<0.10				
Acetone	SW8260	88	MTG	2.5	mg/kg	<0.050 UJ	<2.0	<2.0	<0.0124 UJL	<0.0105 UJL	<0.0111 UJL	<0.0101 UJL
Chlorobenzene	SW8260	0.63	MTG	0.03	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_	_	
Chloroform	SW8260	0.46	MTG	1.19	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_	_	_
Chloromethane	SW8260	0.21	MTG	10.4	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_	_	_
Isopropylbenzene	SW8260	51	MTG	—	mg/kg	<0.020 UJ	<0.10	<0.10	_	_	_	_
Methylene chloride	SW8260	0.016	MTG	0.4	mg/kg	<0.010 UJ	<0.10	<0.10	0.00156 JH	<0.00524	<0.00555	<0.00505
Naphthalene	SW8260	20	MTG	0.0994	mg/kg	<0.020 UJ	<2.0	<2.0	_	_	_	_
n-Butylbenzene	SW8260	15	MTG	—	mg/kg	<0.020 UJ	<0.10	<0.10	_	_	_	_
n-Propylbenzene	SW8260	15	MTG	—	mg/kg	<0.020 UJ	<0.10	<0.10	_	_	_	_
sec-Butylbenzene	SW8260	12	MTG	—	mg/kg	<0.020 UJ	<0.10	<0.10	_	_	_	_
Trichlorofluoromethane	SW8260	86	MTG	16.4	mg/kg	<0.0050 UJ	<0.10	<0.10	_	_		_
1,1,1,2-Tetrachloroethane	SW8260	—	—	225	mg/kg	_	<0.10	<0.10	—			_
1,1,2,2-Tetrachloroethane	SW8260	0.017	MTG	0.127	mg/kg		<0.10	<0.10	_	_	_	
1,1,2-Trichloroethane	SW8260	0.018	MTG	0.4	mg/kg	_	<0.10	<0.10	—	—	—	_
1,1-Dichloroethane	SW8260	25	MTG	0.02	mg/kg		<0.10	<0.10	—	_	—	_
1,1-Dichloroethene	SW8260	0.03	MTG	0.1	mg/kg		<0.10	<0.10	—	—	—	_

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E	1996 AGRA	1996 AGRA	1996 E&E	1996 E&E	1996 E&E	1996 E&E
	Applytical		PCI			BH 11-6	_	_	MW-3	MW-3	MW-3	MW-4
Analyte	Method	PCL	Source	твс	Units	94-UMT-158-SL	1639-06	1639-08	96-UMT-195-SS	96-UMT-196-SB	96-UMT-197-SB	96-UMT-201-SS
1,1-Dichloropropene	SW8260	—	—	—	mg/kg	—	<0.10	<0.10	—	—	—	—
1,2,3-Trichlorobenzene	SW8260	—	—	0.03	mg/kg		<2.0	<2.0	—	—	—	—
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg		<0.10	<0.10	—	—	—	—
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg	—	<0.10	<0.10	—	—	—	—
1,2-Dibromo-3-chloropropane	SW8260	—	—	0.0352	mg/kg		<0.10	<0.10	_	_	_	_
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg		<0.10	<0.10	_	_	_	_
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg	_	<0.10	<0.10	_	_	_	_
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg	_	<0.10	<0.10	_	_	—	_
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg	_	<0.10	<0.10	_	_	_	_
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg	_	<0.10	<0.10	_	_	—	_
2,2-Dichloropropane	SW8260	—	—	—	mg/kg	_	<0.10	<0.10	_	_	—	_
2-Chlorotoluene	SW8260	—	—	—	mg/kg		<0.10	<0.10	_	_	_	_
2-Hexanone	SW8260	—	—	12.6	mg/kg	_	<1.0	<1.0	_	_	_	_
4-Chlorotoluene	SW8260	—	—	—	mg/kg	_	<0.10	<0.10	_	_	_	_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg	_	<1.0	<1.0	_	_	_	_
Bromobenzene	SW8260	—	—	—	mg/kg	_	<0.10	<0.10	_	_	—	_
Bromochloromethane	SW8260	—	—	—	mg/kg	_	<0.10	<0.10	_	_	—	_
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg	_	<0.10	<0.10	—	—	—	—
Bromoform	SW8260	0.34	MTG	15.9	mg/kg	_	<0.10	<0.10	_	_	—	_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg	_	<0.10	<0.10	_	_	—	_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg	_	<0.10	<0.10	_	_	_	_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg	_	<0.10	<0.10	_	_	—	_
Chloroethane	SW8260	34	AZOI	—	mg/kg	_	<0.10	<0.10	_	_	—	_
cis-1,2-Dichloroethene	SW8260	0.24	MTG	—	mg/kg		<0.10	<0.10	_	_	—	_
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg		<0.10	<0.10	_	_	_	_
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg		<0.10	<0.10	_	_	_	
Dibromomethane	SW8260	1.1	MTG	65	mg/kg		<0.10	<0.10	_	_	_	_
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg	_	<0.10	<0.10	—	—	—	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg	—	<0.10	<0.10	—	—	—	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg	_	<0.10	<0.10	<0.00619	<0.00524	<0.00555	<0.00505

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1994 E&E	1996 AGRA	1996 AGRA	1996 E&E	1996 E&E	1996 E&E	1996 E&E
	Analytical		PCI			BH 11-6	—	_	MW-3	MW-3	MW-3	MW-4
Analyte	Method	PCL	Source	твс	Units	94-UMT-158-SL	1639-06	1639-08	96-UMT-195-SS	96-UMT-196-SB	96-UMT-197-SB	96-UMT-201-SS
o-Xylene	SW8260	63	MTG	0.1	mg/kg	_	<0.10	<0.10	<0.00619	<0.00524	<0.00555	<0.00505
Styrene	SW8260	0.96	MTG	0.3	mg/kg	_	<0.10	<0.10		_	_	—
tert-Butylbenzene	SW8260	12	MTG	_	mg/kg	—	<0.10	<0.10		_		
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	<0.10	<0.10	_	_	_	_
trans-1,2-Dichloroethene	SW8260	0.37	MTG	-	mg/kg	_	<0.10	<0.10		_		_
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_	<0.10	<0.10	_	_	_	_
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	_	<0.10	<0.10	_	_	_	_
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	_	<0.10	<0.10	—	—	—	—

						1996 E&E						
	Applytical		PCI			MW-4	MW-5	MW-6	MW-6	MW-6	MW-7	MW-7
Analyte	Method	PCL	Source	TBC	Units	96-UMT-202-SB	96-UMT-208-SB	96-UMT-203-SB	96-UMT-204-SB	96-UMT-205-SB	96-UMT-209-SS	96-UMT-210-SB
	AK 101	0.025	MTG	0.01	mg/kg	<0.090	<0.089	<0.082	<0.082	<0.083	<0.083	<0.093 UJK
Benzene	SW8260	0.025	MTG	0.01	mg/kg	_		_	_	_	_	
Taluara	AK 101	6.5	MTG	0.01	mg/kg	<0.14	<0.13	<0.12	<0.12	<0.12	<0.12	<0.14 UJK
loluene	SW8260	6.5	MTG	0.01	mg/kg	<0.00554	_	<0.00509	<0.0260	<0.00519	0.00450 B	<0.00540
F 4b,	AK 101	6.9	MTG	0.03	mg/kg	<0.10	<0.10	<0.092	<0.092	<0.093	<0.093	<0.10 UJK
Ethylbenzene	SW8260	6.9	MTG	0.03	mg/kg	_		_	_	_	_	_
	AK 101	63	MTG	0.1	mg/kg	<0.28	<0.28	<0.25	<0.26	<0.26	<0.26	<0.29 UJK
Xylenes (total)	SW8260	63	MTG	0.1	mg/kg	<0.00554	_	<0.00509	0.00859 JH	<0.00519	<0.00502	<0.00540
1,1,1-Trichloroethane	SW8260	0.82	MTG	0.07	mg/kg	_	_	_	_	_	_	_
1,2,4-Trimethylbenzene	SW8260	23	MTG	-	mg/kg	_	_	_	_	_	_	
1,2-Dichloroethane	SW8260	0.016	MTG	0.02	mg/kg	_		_	_	_	_	_
1,3,5-Trimethylbenzene	SW8260	23	MTG	_	mg/kg	_		_	_	_	_	_
2-Butanone	SW8260	59	MTG	89.6	mg/kg	_	—	—	_	_	_	_
4-Isopropyltoluene	SW8260	—	—		mg/kg	_	_	_	_	_	_	_
Acetone	SW8260	88	MTG	2.5	mg/kg	<0.0111 UJL		<0.0102 UJL	<0.0519 UJL	<0.0104 UJL	<0.0100 UJL	<0.0108 UJL
Chlorobenzene	SW8260	0.63	MTG	0.03	mg/kg	_		_	_	_	_	_
Chloroform	SW8260	0.46	MTG	1.19	mg/kg	_		_	_	_	_	_
Chloromethane	SW8260	0.21	MTG	10.4	mg/kg	_		_	_	_	_	_
Isopropylbenzene	SW8260	51	MTG	—	mg/kg	_		_	_	_	_	
Methylene chloride	SW8260	0.016	MTG	0.4	mg/kg	0.00261 JH		0.00228 J	0.00676 JH	<0.00519	0.0135	0.00248 J
Naphthalene	SW8260	20	MTG	0.0994	mg/kg	_		_	_	_	_	_
n-Butylbenzene	SW8260	15	MTG	_	mg/kg	_		_	_	_	_	_
n-Propylbenzene	SW8260	15	MTG	—	mg/kg	—	—	—	_	_	_	_
sec-Butylbenzene	SW8260	12	MTG	—	mg/kg	_		_	_	_	_	
Trichlorofluoromethane	SW8260	86	MTG	16.4	mg/kg	—	—	—	_	_	_	
1,1,1,2-Tetrachloroethane	SW8260	—	—	225	mg/kg	—	—	—	_	_	_	
1,1,2,2-Tetrachloroethane	SW8260	0.017	MTG	0.127	mg/kg	—	—	—	_	_	_	_
1,1,2-Trichloroethane	SW8260	0.018	MTG	0.4	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethane	SW8260	25	MTG	0.02	mg/kg	—	—	—	—	—	—	—
1,1-Dichloroethene	SW8260	0.03	MTG	0.1	mg/kg	—	—	—	—	—	—	—

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1996 E&E						
	Analytical		DCI			MW-4	MW-5	MW-6	MW-6	MW-6	MW-7	MW-7
Analyte	Method	PCL	Source	твс	Units	96-UMT-202-SB	96-UMT-208-SB	96-UMT-203-SB	96-UMT-204-SB	96-UMT-205-SB	96-UMT-209-SS	96-UMT-210-SB
1,1-Dichloropropene	SW8260	—	—	_	mg/kg	—	—	—	—	—		—
1,2,3-Trichlorobenzene	SW8260	—	—	0.03	mg/kg	—	—	—	—	—	—	—
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg	—	_	_	_	—	_	—
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg	—	—	—	—	—	—	—
1,2-Dibromo-3-chloropropane	SW8260	—	—	0.0352	mg/kg	_	_	—	—		_	—
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg	—	—	—	—	—	—	—
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg	_	_	—	—		_	—
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg		_	_	_		_	_
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg	—	—	—	—	—	—	—
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg	_	_	_	—	—	—	—
2,2-Dichloropropane	SW8260	—	—	_	mg/kg	_	_	—	—		_	—
2-Chlorotoluene	SW8260	—	—	_	mg/kg	_	_	—	—		_	—
2-Hexanone	SW8260	—	—	12.6	mg/kg		_	_	_		_	_
4-Chlorotoluene	SW8260	—	—	_	mg/kg		_	_	_		_	_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg		_	_	_		_	_
Bromobenzene	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
Bromochloromethane	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg		_	_	_	_	_	_
Bromoform	SW8260	0.34	MTG	15.9	mg/kg	_	_	_	_	_	_	_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg	_		_		_	_	_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg		_	_	_		_	_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg		_	_	_	_	_	_
Chloroethane	SW8260	34	AZOI	—	mg/kg		_	_	_	_	_	_
cis-1,2-Dichloroethene	SW8260	0.24	MTG		mg/kg					_		_
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_	_	_	_	_	_	_
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg		_	_	_		_	_
Dibromomethane	SW8260	1.1	MTG	65	mg/kg	_	_	_	_	—	_	_
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg		—	—	—	—	—	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg		—	—	—	—	—	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg	<0.00554	—	<0.00509	0.00572 JH	<0.00519	<0.00502	<0.00540

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1996 E&E						
	Analytical		PCI			MW-4	MW-5	MW-6	MW-6	MW-6	MW-7	MW-7
Analyte	Method	PCL	Source	TBC	Units	96-UMT-202-SB	96-UMT-208-SB	96-UMT-203-SB	96-UMT-204-SB	96-UMT-205-SB	96-UMT-209-SS	96-UMT-210-SB
o-Xylene	SW8260	63	MTG	0.1	mg/kg	<0.00554	—	<0.00509	0.00288 JH	<0.00519	<0.00502	<0.00540
Styrene	SW8260	0.96	MTG	0.3	mg/kg	—	_	_	_		_	_
tert-Butylbenzene	SW8260	12	MTG	-	mg/kg	_	_	_	_	_	_	_
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	_	_	_	_	_	_
trans-1,2-Dichloroethene	SW8260	0.37	MTG	-	mg/kg	_	_		_		_	_
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_	_	_	_		_	_
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	_	_	—	_	_	_	—
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	_	_	_	_	_	_	—

1996 E&E MW-8 SB-44 SB-45 SB-47 SB-47 **SB-49** SB-50 Analytical PCL 96-UMT-199-SB 96-UMT-200-SB 96-UMT-207-SB 96-UMT-401-SS 96-UMT-212-SB 96-UMT-213-SS 96-UMT-211-SB Analyte Method PCL Source TBC Units 0.025 MTG 0.01 mg/kg <0.083 UJK <0.083 UJK <0.083 UJK < 0.084 <0.085 UJK <0.096 UJK AK 101 Benzene 0.025 MTG 0.01 SW8260 mg/kg _ ____ _ ____ _ ____ ____ MTG <0.12 UJK <0.12 UJK <0.13 UJK <0.13 UJK <0.14 UJK 6.5 0.01 mg/kg < 0.13 AK 101 Toluene 6.5 MTG 0.01 mg/kg < 0.00504 < 0.00597 _ ____ _ _ SW8260 ____ MTG <0.093 UJK <0.093 UJK <0.094 UJK <0.096 UJK 6.9 0.03 < 0.094 <0.11 UJK mg/kg _ AK 101 Ethylbenzene 6.9 MTG 0.03 mg/kg ____ SW8260 ____ MTG 0.1 <0.26 UJK <0.26 UJK <0.26 <0.27 UJK 63 mg/kg <0.26 UJK <0.30 UJK _ AK 101 Xylenes (total) MTG < 0.00597 SW8260 63 0.1 mg/kg _ ____ _ ____ < 0.00504 _ 1.1.1-Trichloroethane 0.82 MTG 0.07 mg/kg SW8260 ____ ____ _ _ ____ ____ ____ 1,2,4-Trimethylbenzene 23 MTG mg/kg ____ SW8260 ____ ____ _ _ ____ ____ _ 1.2-Dichloroethane 0.016 MTG 0.02 mg/kg ____ _ ____ _ ____ _ ____ SW8260 1.3.5-Trimethvlbenzene 23 MTG mg/kg SW8260 ____ ____ ____ _ ____ ____ ____ MTG 59 89.6 mg/kg 2-Butanone SW8260 ____ ____ ____ 4-Isopropyltoluene _ mg/kg SW8260 ____ _ _ _ _ _ ____ _ ____ Acetone 88 MTG 2.5 mg/kg ____ <0.0101 UJL ____ 0.0199 B SW8260 _ _ _ 0.63 MTG 0.03 Chlorobenzene mg/kg _ ____ ____ ____ _ ____ SW8260 Chloroform 0.46 MTG 1.19 mg/kg SW8260 _ _ _ MTG Chloromethane 0.21 10.4 mg/kg SW8260 _ _ _ ____ _ _ ____ 51 MTG Isopropylbenzene _ mg/kg _ ____ ____ _ ____ SW8260 ____ _ Methylene chloride 0.016 MTG 0.4 mg/kg 0.00321 JB 0.00248 JH SW8260 ____ ____ ____ Naphthalene 20 MTG 0.0994 mg/kg SW8260 ____ _ ____ _ ____ _ ____ n-Butylbenzene 15 MTG mg/kg _ _ _ ____ _ _ _ ____ SW8260 n-Propylbenzene 15 MTG mg/kg ____ _ _ ____ _ ____ SW8260 ____ ____ sec-Butylbenzene MTG 12 _ mg/kg _ _ _ _ ____ _ ____ SW8260 MTG Trichlorofluoromethane 86 16.4 SW8260 mg/kg _ _ _ ___ ____ _ ____ 1.1.1.2-Tetrachloroethane 225 mg/kg _ SW8260 _ _ ____ _ ____ ____ ____ _ 1.1.2.2-Tetrachloroethane 0.017 MTG 0.127 mg/kg ____ ____ ____ SW8260 _ _ _ ____ 1.1.2-Trichloroethane 0.018 MTG 0.4 mg/kg _ _ _ _ _ SW8260 _ ____ 25 MTG 1.1-Dichloroethane 0.02 mg/kg ____ ____ ____ ____ ____ SW8260 0.03 MTG 1,1-Dichloroethene 0.1 mg/kg ____ _ _ _ _ _ ____ SW8260

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1996 E&E						
	Apolytical		BCI			MW-8	SB-44	SB-45	SB-47	SB-47	SB-49	SB-50
Analyte	Method	PCL	Source	твс	Units	96-UMT-211-SB	96-UMT-199-SB	96-UMT-200-SB	96-UMT-207-SB	96-UMT-401-SS	96-UMT-212-SB	96-UMT-213-SS
1,1-Dichloropropene	SW8260	—	—		mg/kg	—	—	—	—	—	—	—
1,2,3-Trichlorobenzene	SW8260	—	—	0.03	mg/kg		—	—	—	—	—	—
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg		_	_	_	_		_
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg		—	—	—	—	—	—
1,2-Dibromo-3-chloropropane	SW8260	—	—	0.0352	mg/kg		_	—	_	—		—
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg		_	—	_	—		—
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg		_	—	_	—		—
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg	_	_	_	_	_	_	—
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg		_	_	_	_		_
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg		_	_	_	_	_	_
2,2-Dichloropropane	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
2-Chlorotoluene	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
2-Hexanone	SW8260	—	—	12.6	mg/kg	_	_	_	_	_	_	_
4-Chlorotoluene	SW8260	—	—	—	mg/kg	_	_	_	_	_	_	_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg		_	_	_	_		_
Bromobenzene	SW8260	—	—	—	mg/kg		_	_	_	_	_	_
Bromochloromethane	SW8260	—	—	_	mg/kg	_	_	—	_	_	_	—
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg		_	_	_	_	_	_
Bromoform	SW8260	0.34	MTG	15.9	mg/kg	_	_	_	_	_	_	_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg	_	_	_		_	_	_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg	_	_	_		_	_	_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg		_	_	_	_	_	_
Chloroethane	SW8260	34	AZOI	—	mg/kg		_	_	_	_	_	_
cis-1,2-Dichloroethene	SW8260	0.24	MTG	—	mg/kg		_	_	_	_	_	_
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	_	_	_	_	_	_	_
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg	_	_	_	_	_	_	_
Dibromomethane	SW8260	1.1	MTG	65	mg/kg		_	_	_	_	_	_
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg		—	_	_	—	—	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg		—	—	—	—	—	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg	—	—	-	—	<0.00504	—	<0.00597

 Table F-2b

 Summary of Soil Sample Results - Volatile Organic Compounds

						1996 E&E						
	Analytical		PCI			MW-8	SB-44	SB-45	SB-47	SB-47	SB-49	SB-50
Analyte	Method	PCL	Source	TBC	Units	96-UMT-211-SB	96-UMT-199-SB	96-UMT-200-SB	96-UMT-207-SB	96-UMT-401-SS	96-UMT-212-SB	96-UMT-213-SS
o-Xylene	SW8260	63	MTG	0.1	mg/kg	_	_	—	—	<0.00504	_	<0.00597
Styrene	SW8260	0.96	MTG	0.3	mg/kg	_	_	_	_	_	_	
tert-Butylbenzene	SW8260	12	MTG		mg/kg	_	_	_	_	_	_	
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	_	_	_	_	_	
trans-1,2-Dichloroethene	SW8260	0.37	MTG		mg/kg	—	—	_	—	—	_	—
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	—	—	_	—	—	_	—
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	_	_	_	_	_	_	
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	_	—	—	—	—	_	—

						1996 E&E	1996 E&E
	Applytical		PCI			SB-50	SB-51
Analyte	Method	PCL	Source	твс	Units	96-UMT-214-SB	96-UMT-215-SB
	AK 101	0.025	MTG	0.01	mg/kg	<0.085 UJK	<0.088 UJK
Benzene	SW8260	0.025	MTG	0.01	mg/kg	_	—
Taluana	AK 101	6.5	MTG	0.01	mg/kg	<0.13 UJK	0.50 JK
loiuene	SW8260	6.5	MTG	0.01	mg/kg	<0.00517	_
	AK 101	6.9	MTG	0.03	mg/kg	<0.095 UJK	<0.099 UJK
Ethylbenzene	SW8260	6.9	MTG	0.03	mg/kg		—
Vulance (total)	AK 101	63	MTG	0.1	mg/kg	<0.26 UJK	0.22 JK
	SW8260	63	MTG	0.1	mg/kg	<0.00517	—
1,1,1-Trichloroethane	SW8260	0.82	MTG	0.07	mg/kg	_	—
1,2,4-Trimethylbenzene	SW8260	23	MTG	—	mg/kg	—	—
1,2-Dichloroethane	SW8260	0.016	MTG	0.02	mg/kg	—	—
1,3,5-Trimethylbenzene	SW8260	23	MTG	—	mg/kg	—	—
2-Butanone	SW8260	59	MTG	89.6	mg/kg	—	—
4-Isopropyltoluene	SW8260	—	—	—	mg/kg		—
Acetone	SW8260	88	MTG	2.5	mg/kg	<0.0104 UJL	—
Chlorobenzene	SW8260	0.63	MTG	0.03	mg/kg	—	—
Chloroform	SW8260	0.46	MTG	1.19	mg/kg	—	—
Chloromethane	SW8260	0.21	MTG	10.4	mg/kg	—	—
Isopropylbenzene	SW8260	51	MTG	—	mg/kg	—	—
Methylene chloride	SW8260	0.016	MTG	0.4	mg/kg	0.0117 JH	—
Naphthalene	SW8260	20	MTG	0.0994	mg/kg	—	—
n-Butylbenzene	SW8260	15	MTG	—	mg/kg	—	—
n-Propylbenzene	SW8260	15	MTG	—	mg/kg	—	—
sec-Butylbenzene	SW8260	12	MTG	—	mg/kg	—	—
Trichlorofluoromethane	SW8260	86	MTG	16.4	mg/kg	—	—
1,1,1,2-Tetrachloroethane	SW8260		—	225	mg/kg		—
1,1,2,2-Tetrachloroethane	SW8260	0.017	MTG	0.127	mg/kg		—
1,1,2-Trichloroethane	SW8260	0.018	MTG	0.4	mg/kg		—
1,1-Dichloroethane	SW8260	25	MTG	0.02	mg/kg		—
1,1-Dichloroethene	SW8260	0.03	MTG	0.1	mg/kg		—
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Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

						1996 E&E	1996 E&E
	Analytical		PCI			SB-50	SB-51
Analyte	Method	PCL	Source	TBC	Units	96-UMT-214-SB	96-UMT-215-SB
1,1-Dichloropropene	SW8260	—	—	—	mg/kg		—
1,2,3-Trichlorobenzene	SW8260			0.03	mg/kg	_	_
1,2,3-Trichloropropane	SW8260	0.00053	MTG	3.36	mg/kg	_	_
1,2,4-Trichlorobenzene	SW8260	0.85	MTG	0.03	mg/kg	_	_
1,2-Dibromo-3-chloropropane	SW8260		_	0.0352	mg/kg	_	_
1,2-Dibromoethane	SW8260	0.00016	MTG	1.23	mg/kg	_	_
1,2-Dichlorobenzene	SW8260	5.1	MTG	0.03	mg/kg	_	_
1,2-Dichloropropane	SW8260	0.018	MTG	0.002	mg/kg	_	_
1,3-Dichlorobenzene	SW8260	28	MTG	0.03	mg/kg	_	_
1,4-Dichlorobenzene	SW8260	0.64	MTG	0.03	mg/kg	_	_
2,2-Dichloropropane	SW8260		_	-	mg/kg	_	_
2-Chlorotoluene	SW8260		—	—	mg/kg	_	_
2-Hexanone	SW8260	-	—	12.6	mg/kg	_	_
4-Chlorotoluene	SW8260	-	—	_	mg/kg	_	_
4-Methyl-2-pentanone	SW8260	8.1	MTG	443	mg/kg	—	—
Bromobenzene	SW8260		_	-	mg/kg	_	_
Bromochloromethane	SW8260	_	—	—	mg/kg	_	_
Bromodichloromethane	SW8260	0.044	MTG	0.54	mg/kg	_	_
Bromoform	SW8260	0.34	MTG	15.9	mg/kg	_	_
Bromomethane	SW8260	0.16	MTG	0.235	mg/kg	_	_
Carbon disulfide	SW8260	12	MTG	0.0941	mg/kg	_	_
Carbon tetrachloride	SW8260	0.023	MTG	0.4	mg/kg	_	_
Chloroethane	SW8260	34	AZOI	—	mg/kg	_	_
cis-1,2-Dichloroethene	SW8260	0.24	MTG	—	mg/kg	_	_
cis-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	—	—
Dibromochloromethane	SW8260	0.032	MTG	2.05	mg/kg	—	—
Dibromomethane	SW8260	1.1	MTG	65	mg/kg	—	—
Dichlorodifluoromethane	SW8260	140	MTG	39.5	mg/kg	—	—
Hexachlorobutadiene	SW8260	0.12	MTG	0.0398	mg/kg	—	—
m,p-Xylene	SW8260	63	MTG	0.1	mg/kg	<0.00517	—

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

						1996 E&E	1996 E&E
	Analytical		PCL			SB-50	SB-51
Analyte	Method	PCL	Source	твс	Units	96-UMT-214-SB	96-UMT-215-SB
o-Xylene	SW8260	63	MTG	0.1	mg/kg	<0.00517	—
Styrene	SW8260	0.96	MTG	0.3	mg/kg	—	—
tert-Butylbenzene	SW8260	12	MTG	_	mg/kg	—	—
Tetrachloroethene	SW8260	0.024	MTG	0.002	mg/kg	_	_
trans-1,2-Dichloroethene	SW8260	0.37	MTG	_	mg/kg	—	_
trans-1,3-Dichloropropene	SW8260	0.033	MTG	0.398	mg/kg	—	—
Trichloroethene	SW8260	0.02	MTG	0.1	mg/kg	—	—
Vinyl chloride	SW8260	0.0085	MTG	0.01	mg/kg	_	—

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

Table F-2b Summary of Soil Sample Results - Volatile Organic Compounds

Notes:

U, J, K Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

Column headings:	Event
	Location (LOCID)
	Sample ID

- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements
- TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards
- mg/kg milligrams per kilogram
- ADEC Alaska Department of Environmental Conservation
- MTG 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater
- AZOI 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Outdoor Inhalation < Result is less than the listed reporting limit
- **bold** Result or reporting limit exceeds the PCL
- **bold shaded** Result exceeds PCL (regulatory exceedance)

									1996 E&E	1996 E&E	1996 E&E	1996 E&E
Analyte	Analytical		PCL			1996 AGRA	1996 AGRA	1996 AGRA	MW-3	MW-3	MW-3	MW-4
	Method	PCL	Source	твс	Units	1639-06	1639-08	1639-08(DUP)	96-UMT-195-SS	96-UMT-196-SB	96-UMT-197-SB	96-UMT-201-SS
2-Methylpophthalana	PAH SIM	6.1	MTG	3.24	mg/kg	0.012	0.020	0.024	_	—	—	_
	SW8270	6.1	MTG	3.24	mg/kg	—	_	_	0.0753	<0.359	<0.374	<0.342
Acenaphthene	PAH SIM	180	MTG	20	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Acenaphthylene	PAH SIM	180	MTG	682	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Anthracene	PAH SIM	3000	MTG	1480	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Benzo(a)anthracene	PAH SIM	3.6	MTG	5.21	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Benzo(a)pyrene	PAH SIM	0.66	AZDC	1.52	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Benzo(b)fluoranthene	PAH SIM	6.6	AZDC	59.8	mg/kg	<0.0050	<0.0050	0.010	_	_	_	_
Benzo(g,h,i)perylene	PAH SIM	1900	AZDC	119	mg/kg	<0.0050	<0.0050	0.0070	_	_	_	_
Benzo(k)fluoranthene	PAH SIM	66	AZDC	148	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Chrysene	PAH SIM	360	MTG	4.73	mg/kg	0.0060	<0.0050	0.017	_	_		_
Dibenzo(a,h) anthracene	PAH SIM	0.66	AZDC	18.4	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Dibenzofuran	PAH SIM	11	MTG		mg/kg	<0.0050	<0.0050	0.0070	_	_	_	_
Fluoranthene	PAH SIM	1400	MTG	122	mg/kg	<0.0050	<0.0050	<0.0050	—	_	_	_
Fluorene	PAH SIM	220	MTG	30	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Indeno(1,2,3-cd) pyrene	PAH SIM	6.6	AZDC	109	mg/kg	<0.0050	<0.0050	<0.0050	_	_	_	_
Naphthalene	PAH SIM	20	MTG	0.0994	mg/kg	0.0090	0.014	0.010	_	_	_	_
Phananthrana	PAH SIM	3000	MTG	45.7	mg/kg	0.012	0.013	0.039	—	_	_	_
Filendiluiterie	SW8270	3000	MTG	45.7	mg/kg	—	_	—	0.0691	<0.359	<0.374	<0.342
Pyropo	PAH SIM	1000	MTG	78.5	mg/kg	<0.0050	<0.0050	0.0050	_	_	_	_
Pyrene	SW8270	1000	MTG	78.5	mg/kg	—	_	—	<0.409	<0.359	<0.374	<0.342
Benzoic acid	SW8270	410	MTG	_	mg/kg	—	_	_	<2.04	<1.80	<1.87	<1.71
bis(2-Ethylhexyl)phthalate	SW8270	13	MTG	0.1	mg/kg		_		<0.409	0.0566 JB	0.0429	<0.342

 Table F-2c

 Summary of Soil Sample Results - Semivolatile Organic Compounds

						1996 E&E						
Analyte	Analytical		PCL			MW-4	MW-6	MW-6	MW-6	MW-7	MW-7	SB-47
	Method	PCL	Source	твс	Units	96-UMT-202-SB	96-UMT-203-SB	96-UMT-204-SB	96-UMT-205-SB	96-UMT-209-SS	96-UMT-210-SB	96-UMT-401-SS
2-Methylpaphthalene	PAH SIM	6.1	MTG	3.24	mg/kg		—	_	—	—	—	_
	SW8270	6.1	MTG	3.24	mg/kg	<0.371	<0.336	<3.39	<3.43	<0.341	<0.382	<0.348
Acenaphthene	PAH SIM	180	MTG	20	mg/kg			_			—	_
Acenaphthylene	PAH SIM	180	MTG	682	mg/kg						—	_
Anthracene	PAH SIM	3000	MTG	1480	mg/kg	_	_	_	_	_	_	_
Benzo(a)anthracene	PAH SIM	3.6	MTG	5.21	mg/kg	_	—	_	—	—	—	—
Benzo(a)pyrene	PAH SIM	0.66	AZDC	1.52	mg/kg			_			—	—
Benzo(b)fluoranthene	PAH SIM	6.6	AZDC	59.8	mg/kg	_	_	_	_	_	—	—
Benzo(g,h,i)perylene	PAH SIM	1900	AZDC	119	mg/kg	—	—	—	—	—	—	—
Benzo(k)fluoranthene	PAH SIM	66	AZDC	148	mg/kg	_	—	_	_	—	—	—
Chrysene	PAH SIM	360	MTG	4.73	mg/kg	_	_	_	_	_	_	_
Dibenzo(a,h) anthracene	PAH SIM	0.66	AZDC	18.4	mg/kg						—	_
Dibenzofuran	PAH SIM	11	MTG	—	mg/kg	_	_	_	_	_	—	—
Fluoranthene	PAH SIM	1400	MTG	122	mg/kg	—	—	—	—	—	—	—
Fluorene	PAH SIM	220	MTG	30	mg/kg	_	—	_	—	_	—	—
Indeno(1,2,3-cd) pyrene	PAH SIM	6.6	AZDC	109	mg/kg	_	_	_	_	_	—	—
Naphthalene	PAH SIM	20	MTG	0.0994	mg/kg	_	_	_	_	_	—	—
Phenanthrana	PAH SIM	3000	MTG	45.7	mg/kg	—	—	—	—	—	—	—
i nenananene	SW8270	3000	MTG	45.7	mg/kg	<0.371	<0.336	<3.39	<3.43	<0.341	<0.382	<0.348
Durana	PAH SIM	1000	MTG	78.5	mg/kg						—	_
r yrche	SW8270	1000	MTG	78.5	mg/kg	<0.371	<0.336	0.377	0.616 JH	<0.341	<0.382	<0.348
Benzoic acid	SW8270	410	MTG	_	mg/kg	<1.86	<1.68	<17.0	<17.1	<1.70	<1.91	<1.74
bis(2-Ethylhexyl)phthalate	SW8270	13	MTG	0.1	mg/kg	0.0461 JB	0.0517	<3.39	<3.43	0.118 JB	0.0483 JB	0.105 J

 Table F-2c

 Summary of Soil Sample Results - Semivolatile Organic Compounds

						1996 E&E	1996 E&E
Analyte	Analytical		PCL			SB-50	SB-50
	Method	PCL	Source	твс	Units	96-UMT-213-SS	96-UMT-214-SB
2-Methylpaphthalene	PAH SIM	6.1	MTG	3.24	mg/kg	_	—
	SW8270	6.1	MTG	3.24	mg/kg	0.0428 J	<0.349
Acenaphthene	PAH SIM	180	MTG	20	mg/kg		—
Acenaphthylene	PAH SIM	180	MTG	682	mg/kg	—	—
Anthracene	PAH SIM	3000	MTG	1480	mg/kg	_	—
Benzo(a)anthracene	PAH SIM	3.6	MTG	5.21	mg/kg	_	—
Benzo(a)pyrene	PAH SIM	0.66	AZDC	1.52	mg/kg	_	—
Benzo(b)fluoranthene	PAH SIM	6.6	AZDC	59.8	mg/kg	_	—
Benzo(g,h,i)perylene	PAH SIM	1900	AZDC	119	mg/kg	_	_
Benzo(k)fluoranthene	PAH SIM	66	AZDC	148	mg/kg	_	—
Chrysene	PAH SIM	360	MTG	4.73	mg/kg	_	—
Dibenzo(a,h) anthracene	PAH SIM	0.66	AZDC	18.4	mg/kg	_	—
Dibenzofuran	PAH SIM	11	MTG	_	mg/kg	_	—
Fluoranthene	PAH SIM	1400	MTG	122	mg/kg	_	—
Fluorene	PAH SIM	220	MTG	30	mg/kg	_	—
Indeno(1,2,3-cd) pyrene	PAH SIM	6.6	AZDC	109	mg/kg	—	—
Naphthalene	PAH SIM	20	MTG	0.0994	mg/kg	_	—
Phononthrono	PAH SIM	3000	MTG	45.7	mg/kg	_	—
i nenantinene	SW8270	3000	MTG	45.7	mg/kg	<0.396	<0.349
D yropo	PAH SIM	1000	MTG	78.5	mg/kg	_	—
i yrono	SW8270	1000	MTG	78.5	mg/kg	<0.396	<0.349
Benzoic acid	SW8270	410	MTG	_	mg/kg	0.0585 J	<1.75
bis(2-Ethylhexyl)phthalate	SW8270	13	MTG	0.1	mg/kg	0.0447 JB	0.0536 JB

 Table F-2c

 Summary of Soil Sample Results - Semivolatile Organic Compounds

Table F-2c Summary of Soil Sample Results - Semivolatile Organic Compounds

Notes:

B, J Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

Column headings:	Event
	Location (LOCID)
	Sample ID

- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements
- TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards
- mg/kg milligrams per kilogram
- ADEC Alaska Department of Environmental Conservation
- MTG 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater
- AZDC 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Direct Contact
 - < Result is less than the listed reporting limit
- **bold** Result or reporting limit exceeds the PCL
- bold shaded Result exceeds PCL (regulatory exceedance)

						1994 E&E					
	Analytical		PCI			BH 11-1	BH 11-2				
Analyte	Method	PCL	Source	твс	Units	94-UMT-135-SL	94-UMT-136-SL	94-UMT-137-SL	94-UMT-138-SL	94-UMT-139-SL	94-UMT-142-SL
Aroclor 1016	SW8080 Series			0.000332	mg/kg	—	—	—	—	—	—
Aroclor 1221	SW8080 Series			0.000332	mg/kg	_	—	—	—	_	_
Aroclor 1232	SW8080 Series			0.000332	mg/kg	_	—	—	—	_	_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	—	_	_	_	—	—
Aroclor 1248	SW8080 Series	1 0 0 0 0		0.000332	mg/kg	_	—	—	—	_	_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	<0.10	<0.10	<0.059	<0.10	<0.10	<0.10
Aroclor 1260	SW8080 Series			0.000332	mg/kg	<0.10	<0.10	<0.059	<0.10	<0.10	<0.10
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010
Endosulfan sulfate	SW8080 Series	_	—	0.0358	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	<0.010	<0.010	<0.0035	<0.010	<0.010	<0.010

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

						1994 E&E					
	Analytical		PCI			BH 11-2	BH 11-2	BH 11-3	BH 11-3	BH 11-3	BH 11-4
Analyte	Method	PCL	Source	твс	Units	94-UMT-143-SL	94-UMT-144-SL	94-UMT-145-SL	94-UMT-146-SL	94-UMT-147-SL	94-UMT-148-SL
Aroclor 1016	SW8080 Series			0.000332	mg/kg		—	—	—	—	—
Aroclor 1221	SW8080 Series			0.000332	mg/kg	—	_	—	_	—	_
Aroclor 1232	SW8080 Series	1		0.000332	mg/kg	_	_	—	_		_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	_	_	—	_		_
Aroclor 1248	SW8080 Series			0.000332	mg/kg	—	_	—	_		_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	<0.10	<0.059	<0.10	<0.10	<0.10	<0.10
Aroclor 1260	SW8080 Series			0.000332	mg/kg	<0.10	<0.059	<0.10	<0.10	<0.10	<0.10
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010
Endosulfan sulfate	SW8080 Series	—	—	0.0358	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	<0.010	<0.0035	<0.010	<0.010	<0.010	<0.010

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

						1994 E&E					
	Applytical		BCI			BH 11-4	BH 11-4	BH 11-5	BH 11-5	BH 11-5	BH 11-6
Analyte	Method	PCL	Source	твс	Units	94-UMT-149-SL	94-UMT-150-SL	94-UMT-151-SL	94-UMT-152-SL	94-UMT-153-SL	94-UMT-154-SL
Aroclor 1016	SW8080 Series			0.000332	mg/kg	_	—	—	—	—	—
Aroclor 1221	SW8080 Series			0.000332	mg/kg	—	—		—		_
Aroclor 1232	SW8080 Series			0.000332	mg/kg	_	—				_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	_	—				_
Aroclor 1248	SW8080 Series			0.000332	mg/kg	—	—		—		_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
Aroclor 1260	SW8080 Series			0.000332	mg/kg	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	0.040
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10
Endosulfan sulfate	SW8080 Series	—	—	0.0358	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	<0.010	<0.010	<0.010	<0.010	<0.010	<0.10

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides
						1994 E&E	1994 E&E	1994 E&E	1994 E&E	1996 E&E	1996 E&E
	Analytical		PCI			BH 11-6	BH 11-6	BH 11-6	BH 11-6	MW-3	MW-3
Analyte	Method	PCL	Source	твс	Units	94-UMT-155-SL	94-UMT-156-SL	94-UMT-157-SL	94-UMT-158-SL	96-UMT-195-SS	96-UMT-196-SB
Aroclor 1016	SW8080 Series			0.000332	mg/kg		—		—	—	—
Aroclor 1221	SW8080 Series			0.000332	mg/kg	—	—		—	—	_
Aroclor 1232	SW8080 Series			0.000332	mg/kg	—	—		—	—	_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	_	—		—	—	_
Aroclor 1248	SW8080 Series			0.000332	mg/kg	—	—		—	—	_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	<0.10	<0.10	<0.11	<0.10	<0.0495	<0.0218
Aroclor 1260	SW8080 Series			0.000332	mg/kg	<0.10	<0.10	<0.11	<0.10	—	_
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	<0.010	<0.010	0.026	<0.010	0.00384 J	<0.00218
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	<0.010	<0.010	<0.0063	<0.010	<0.00495	<0.00218
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	0.020	0.020	0.029	0.050	0.00953 J	<0.00544 UJL
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	<0.010	<0.010	<0.0063	<0.010	—	_
Endosulfan sulfate	SW8080 Series	_	—	0.0358	mg/kg	<0.010	<0.010	<0.0063	<0.010	_	_
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	<0.010	<0.010	<0.0063	<0.010	—	—
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	<0.010	<0.010	<0.0063	<0.010	—	_

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

						1996 E&E					
	Analytical		PCI			MW-3	MW-4	MW-4	MW-5	MW-6	MW-6
Analyte	Method	PCL	Source	твс	Units	96-UMT-197-SB	96-UMT-201-SS	96-UMT-202-SB	96-UMT-208-SB	96-UMT-203-SB	96-UMT-204-SB
Aroclor 1016	SW8080 Series			0.000332	mg/kg		—	—	—	—	—
Aroclor 1221	SW8080 Series	-		0.000332	mg/kg	—	_	_	_	_	_
Aroclor 1232	SW8080 Series			0.000332	mg/kg	_	_	_	_	_	_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	—	_	—	_	_	_
Aroclor 1248	SW8080 Series	1 0 2 0)		0.000332	mg/kg	_	_	_	_	_	_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	<0.0227	<0.0207	<0.0225	<0.0222	<0.0204	<41.1
Aroclor 1260	SW8080 Series			0.000332	mg/kg	_	_	_	_	_	_
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	<0.00227	<0.00207	0.000563 J	<0.00222	<0.00204	29.0 JK
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	<0.00227	<0.00207	<0.00225	<0.00222	<0.00204	<4.11
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	<0.00567	0.00173 J	0.00105 JL	<0.00554 UJL	<0.00509	35.5 JK
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	_	_	_	_	_	_
Endosulfan sulfate	SW8080 Series	—	—	0.0358	mg/kg	—	_	—	_	_	_
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	—	—	—	—	—	—
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	—	_	—	_	_	_

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

						1996 E&E					
	Applytical		BCI			MW-6	MW-7	MW-7	MW-8	SB-44	SB-45
Analyte	Method	PCL	Source	твс	Units	96-UMT-205-SB	96-UMT-209-SS	96-UMT-210-SB	96-UMT-211-SB	96-UMT-199-SB	96-UMT-200-SB
Aroclor 1016	SW8080 Series			0.000332	mg/kg		—	—	—	—	—
Aroclor 1221	SW8080 Series			0.000332	mg/kg	_	—	—	_	—	_
Aroclor 1232	SW8080 Series			0.000332	mg/kg	—	—	—	_	—	_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	—	_	—	_	—	_
Aroclor 1248	SW8080 Series			0.000332	mg/kg	_	—	—	_	—	_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	<41.5	<0.0206	<0.0231	0.0418	<0.0207	<0.0207
Aroclor 1260	SW8080 Series			0.000332	mg/kg	—	_	—	_	—	_
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	31.4 JK	<0.00206	<0.00231	0.00192 J	<0.00207	<0.00208
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	<4.15	<0.00206	<0.00231	<0.00208	<0.00207	<0.00208
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	38.2 JK	<0.00516 UJL	<0.00579 UJL	0.00498 JL	0.000363 JL	0.00198 JL
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	_	_	—	_	—	_
Endosulfan sulfate	SW8080 Series	—	—	0.0358	mg/kg	—	_	—	_	—	_
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	—	—	—	_	—	—
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg		_	—	_	—	_

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

						1996 E&E					
	Analytical		PCI			SB-47	SB-47	SB-49	SB-50	SB-50	SB-51
Analyte	Method	PCL	Source	твс	Units	96-UMT-207-SB	96-UMT-401-SS	96-UMT-212-SB	96-UMT-213-SS	96-UMT-214-SB	96-UMT-215-SB
Aroclor 1016	SW8080 Series			0.000332	mg/kg		—	—	—	—	—
Aroclor 1221	SW8080 Series	-		0.000332	mg/kg	—	_	—	—	—	_
Aroclor 1232	SW8080 Series			0.000332	mg/kg	_	_		—	—	_
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg	—	_	—	—	—	_
Aroclor 1248	SW8080 Series	1 0 2 0)		0.000332	mg/kg	_	_		—	—	_
Aroclor 1254	SW8080 Series			0.000332	mg/kg	0.224	<0.527	<0.0851	<0.240	<0.0212	<0.0221
Aroclor 1260	SW8080 Series			0.000332	mg/kg	_	_		—	—	_
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	0.0306	0.0579 JK	0.0154 JH	0.0393	0.00219	<0.00221
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	0.000619 J	<0.0527	<0.00851	0.000504 J	<0.00212	<0.00221
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	0.0435 JL	0.376 JH	0.0423 JL	0.171 JL	0.0111 JL	0.00254 J
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg	_	_		—	—	_
Endosulfan sulfate	SW8080 Series	—	—	0.0358	mg/kg	—	_	—	—	—	_
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg	_	_	—	—	—	_
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	—	—	—	—	—	_

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

						1997 E&E	1997 E&E	1997 E&E	1997 E&E	2001 Jacobs
	Analytical		PCI			SB-182	SB-183	SB-184	SB-185	—
Analyte	Method	PCL	Source	твс	Units	97-UMT-117-SB	97-UMT-118-SB	97-UMT-120-SB	97-UMT-121-SB	UM-A110101
Aroclor 1016	SW8080 Series			0.000332	mg/kg	—	—	—	—	<0.11
Aroclor 1221	SW8080 Series			0.000332	mg/kg	—	_	—	—	<0.21
Aroclor 1232	SW8080 Series			0.000332	mg/kg		_	—	_	<0.11
Aroclor 1242	SW8080 Series	1 (Total PCBs)	AZDC	0.000332	mg/kg		_	—	_	<0.11
Aroclor 1248	SW8080 Series	. 020)		0.000332	mg/kg	—	_	—	—	<0.11
Aroclor 1254	SW8080 Series			0.000332	mg/kg		_	—	_	2.3
Aroclor 1260	SW8080 Series			0.000332	mg/kg		_	—	_	<0.11
4,4'-DDD	SW8080 Series	7.2	MTG	0.01	mg/kg	0.0059	<0.0037	<0.0019	<0.0036	_
4,4'-DDE	SW8080 Series	5.1	MTG	0.01	mg/kg	—	_	—	—	_
4,4'-DDT	SW8080 Series	7.3	MTG	0.01	mg/kg	0.0065	<0.0037	<0.0019	<0.0036	_
Endosulfan II	SW8080 Series	64	MTG	0.00001	mg/kg		_	—	_	_
Endosulfan sulfate	SW8080 Series	_	_	0.0358	mg/kg	—	_	_	_	_
Endrin	SW8080 Series	0.29	MTG	0.00004	mg/kg		_	—	—	_
Endrin aldehyde	SW8080 Series	—	—	0.0105	mg/kg	—	—	—	—	—

 Table F-2d

 Summary of Soil Sample Results - PCBs & Pesticides

Table F-2d Summary of Soil Sample Results - PCBs & Pesticides

Notes:

H, J, K, L, U Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

Column headings:	Event
	Location (LOCID)
	Sample ID

- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements
- TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards
- mg/kg milligrams per kilogram
- MTG 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater
- AZDC 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Direct Contact
 - NoPCL/TBC was available for this analyte
 - < Result is less than the listed reporting limit
- bold Result or reporting limit exceeds the PCL
- **bold shaded** Result exceeds PCL (regulatory exceedance)

						1994 E&E					
			PCL			BH 11-1	BH 11-2				
Analyte	Analytical Method	PCL	Source	TBC	Units	94-UMT-135-SL	94-UMT-136-SL	94-UMT-137-SL	94-UMT-138-SL	94-UMT-139-SL	94-UMT-142-SL
Aluminum	SW6000/7000 Series	_	—	50	mg/kg	—	—	—	_	—	_
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg	_		_	_	_	_
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	5.0 J	4.0 J	4.4 J	2.0 J	6.0 J	4.0 J
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	276 J	272 J	400 J	160 J	194 J	243 J
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg	_		_	_	_	_
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<1.0	<1.0	<2.4	<1.0	<1.0	<1.0
Calcium	SW6000/7000 Series	_	—	—	mg/kg	—	—	—	_	—	—
Chromium	SW6000/7000 Series	25	MTG	—	mg/kg	13 J	12 J	13 J	5.0 J	7.0 J	8.0 J
Cobalt	SW6000/7000 Series	_	—	0.14	mg/kg	—	—	—	_	—	_
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	_	—	—	—	—	_
Iron	SW6000/7000 Series		—	200	mg/kg	_	—	—		—	_
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	7.0	7.0	6.6	3.0	8.0	5.0
Magnesium	SW6000/7000 Series	_	—	—	mg/kg	—	—	—	_	—	_
Manganese	SW6000/7000 Series	_	—	100	mg/kg	—	—	—	_	—	_
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	<0.20	<0.20	<0.10	<0.20	<0.20	<0.20
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	—	—	—	_	—	—
Potassium	SW6000/7000 Series	_	—	—	mg/kg	—	—	—	_	—	—
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	<1.0	<1.0	<0.60	<1.0	<1.0	<1.0
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<2.0	<2.0	<2.4	<2.0	<2.0	<2.0
Sodium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	—	—	—
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	—	—	—	_	—	_
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg	_	_	_	_	—	_
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg		_				_

Table F-2eSummary of Soil Sample Results - Metals

						1994 E&E					
			PCL			BH 11-2	BH 11-2	BH 11-3	BH 11-3	BH 11-3	BH 11-4
Analyte	Analytical Method	PCL	Source	TBC	Units	94-UMT-143-SL	94-UMT-144-SL	94-UMT-145-SL	94-UMT-146-SL	94-UMT-147-SL	94-UMT-148-SL
Aluminum	SW6000/7000 Series		—	50	mg/kg		—	—	_	—	—
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg			_		_	_
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	4.0 J	4.0 J	5.0 J	1.0 J	2.0 J	7.0 J
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	173 J	158 J	273 J	239 J	125 J	430 J
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg			_		_	_
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<1.0	<2.4	<1.0	<1.0	<1.0	<1.0
Calcium	SW6000/7000 Series		—	—	mg/kg					_	_
Chromium	SW6000/7000 Series	25	MTG	—	mg/kg	6.0 J	6.0 J	10 J	4.0 J	5.0 J	23 J
Cobalt	SW6000/7000 Series	—	—	0.14	mg/kg	—	—	—	_	—	—
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	—	—	—	_	—	—
Iron	SW6000/7000 Series		—	200	mg/kg	_	—	_		—	—
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	5.0	4.0	6.0	2.0	3.0	10
Magnesium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	_	—	—
Manganese	SW6000/7000 Series	—	—	100	mg/kg	_	—	—	_	—	—
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	<0.20	<0.10	<0.20	<0.20	<0.20	<0.20
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	—	—	—	_	—	—
Potassium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	_	—	—
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	<1.0	<0.60	<1.0	2.0	1.0	<1.0
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<2.0	<2.4	<2.0	<2.0	<2.0	<2.0
Sodium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	—	—	—
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	—	—	—	—	—	—
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg		—	_			_
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg		_			_	_

Table F-2eSummary of Soil Sample Results - Metals

						1994 E&E					
			PCL			BH 11-4	BH 11-4	BH 11-5	BH 11-5	BH 11-5	BH 11-6
Analyte	Analytical Method	PCL	Source	TBC	Units	94-UMT-149-SL	94-UMT-150-SL	94-UMT-151-SL	94-UMT-152-SL	94-UMT-153-SL	94-UMT-154-SL
Aluminum	SW6000/7000 Series		—	50	mg/kg	_	—	—	_	—	_
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg	_	_	_		_	_
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	6.0 J	5.0 J	3.0 J	3.0 J	4.0 J	4.0 J
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	375 J	269 J	189 J	162 J	236 J	170 J
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg		_	_		_	_
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Calcium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	_	—	_
Chromium	SW6000/7000 Series	25	MTG	—	mg/kg	14 J	11 J	7.0 J	6.0 J	12 J	7.0 J
Cobalt	SW6000/7000 Series	—	—	0.14	mg/kg	—	—	—	_	—	_
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	—	—	—	_	—	_
Iron	SW6000/7000 Series		—	200	mg/kg	—	—	_		_	
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	8.0	6.0	5.0	4.0	6.0	5.0
Magnesium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	_	—	_
Manganese	SW6000/7000 Series	—	—	100	mg/kg		—	—	_	—	_
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	—	—	—	_	—	_
Potassium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	_	—	_
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	1.0	1.0	<1.0	2.0	<1.0	3.0
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0
Sodium	SW6000/7000 Series	—	—	—	mg/kg	—	—	—	—	—	—
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	—	—	—	—	—	_
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg		_	_		_	_
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg		—	—	—	—	—

Table F-2eSummary of Soil Sample Results - Metals

						1994 E&E	1994 E&E	1994 E&E	1994 E&E	1996 AGRA	1996 AGRA
			PCL			BH 11-6	BH 11-6	BH 11-6	BH 11-6	_	_
Analyte	Analytical Method	PCL	Source	твс	Units	94-UMT-155-SL	94-UMT-156-SL	94-UMT-157-SL	94-UMT-158-SL	1639-06	1639-08
Aluminum	SW6000/7000 Series	_		50	mg/kg		—	—	—	_	—
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg			_	_	_	—
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	3.0 J	3.0 J	4.0 J	4.0 J	3	8
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	181 J	158 J	274 J	223 J	_	—
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg	_	_	_	—	_	—
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<1.0	<1.0	<2.1	<1.0	_	—
Calcium	SW6000/7000 Series	_	—	-	mg/kg	—	_	—	—	_	—
Chromium	SW6000/7000 Series	25	MTG	-	mg/kg	4.0 J	5.0 J	5.8 J	7.0 J	_	—
Cobalt	SW6000/7000 Series	_	—	0.14	mg/kg	—	_	_	—	_	—
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	—	—	—	—	—	—
Iron	SW6000/7000 Series		_	200	mg/kg		_	_	—		—
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	5.0	5.0	5.3	7.0	<20	<20
Magnesium	SW6000/7000 Series	_	—	_	mg/kg	_	_	_	—	_	—
Manganese	SW6000/7000 Series	—	—	100	mg/kg	—	—	—	—	—	—
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	<0.20	<0.20	<0.10	<0.20		—
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	_	_	—	—	_	—
Potassium	SW6000/7000 Series	_	—	_	mg/kg	_	_	—	—	_	—
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	<1.0	<1.0	<0.50	<1.0	_	—
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<2.0	<2.0	<2.1	<2.0		—
Sodium	SW6000/7000 Series	_	—	_	mg/kg	_	_	_	—	_	—
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	—	_	—	—	—	—
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg	_		_	—		_
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg	_		_	—		_

Table F-2e Summary of Soil Sample Results - Metals

						1996 E&E					
			PCI			MW-3	MW-3	MW-3	MW-4	MW-4	MW-6
Analyte	Analytical Method	PCL	Source	твс	Units	96-UMT-195-SS	96-UMT-196-SB	96-UMT-197-SB	96-UMT-201-SS	96-UMT-202-SB	96-UMT-203-SB
Aluminum	SW6000/7000 Series	_	_	50	mg/kg	9280	2830	1700	3470	3900	1730
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg	<7.10 UJL	<5.60	<6.20 UJL	<5.80 UJL	<6.10 UJL	<5.80 UJL
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	8.40 JK	1.90	1.80 JK	5.70 JK	5.10	1.80 JK
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	552	164 JK	137	220	287 JK	102
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg	0.370 J	0.0700 J	0.0700 J	0.170 J	0.160 J	0.0700 J
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<0.320 UJL	<0.250	<0.280 UJL	<0.260 UJL	<0.270 UJL	<0.260 UJL
Calcium	SW6000/7000 Series	_	—	_	mg/kg	4290	1240	718	1580	1620	736
Chromium	SW6000/7000 Series	25	MTG	_	mg/kg	19.2	8.50	4.00	6.10	8.30	3.20
Cobalt	SW6000/7000 Series	_	—	0.14	mg/kg	13.8	3.60	2.80	5.70	5.70	2.90
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	31.4 JH	9.30 JK	7.20 JH	14.1 JH	14.4 JK	8.30 JH
Iron	SW6000/7000 Series	_	—	200	mg/kg	27800	7580	5590	12300	11800	5800
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	10.9 JK	2.30 JK	3.00 JK	4.60 JK	5.60 JK	3.30 JK
Magnesium	SW6000/7000 Series	_	—	_	mg/kg	5170	1650 JK	828	1880	1990 JK	930
Manganese	SW6000/7000 Series	_	—	100	mg/kg	805	198	215	364	391	195
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	0.0400	<0.0200	<0.0200	<0.0200	0.0600 JH	<0.0200
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	38.5	10.6	9.00	17.8	17.4	9.40
Potassium	SW6000/7000 Series	_	_	_	mg/kg	912	305	227	336	489	185
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	<0.500	<0.390	<0.430	0.450 J	<0.430	<0.410
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<0.250 UJL	<0.200	<0.220 UJL	<0.210 UJL	<0.220 UJL	<0.210 UJL
Sodium	SW6000/7000 Series	_	_	_	mg/kg	<85.5	<66.7	<74.8	<70.2	<73.4	<69.7
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	<0.360	<0.280	<0.320	<0.300	<0.310	<0.300
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg	30.7	11.1 JK	5.80	13.7	12.5 JK	6.70
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg	121	21.4	47.9	59.5	39.6	40.2

Table F-2eSummary of Soil Sample Results - Metals

						1996 E&E					
			PCL			MW-6	MW-6	MW-7	MW-7	SB-47	SB-50
Analyte	Analytical Method	PCL	Source	твс	Units	96-UMT-204-SB	96-UMT-205-SB	96-UMT-209-SS	96-UMT-210-SB	96-UMT-401-SS	96-UMT-213-SS
Aluminum	SW6000/7000 Series		_	50	mg/kg	2340	2530	4890	3040	2700	8060
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg	<5.00 UJL	<5.90 UJL	<5.50	<6.30	0.950 J	<6.30
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	2.60 JK	3.90 JK	5.70	3.50	3.90	6.80
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	140	187	264 JK	271 JK	200	537 JK
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg	0.0900 J	0.100 J	0.170 J	0.110 J	0.120 J	0.280 J
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<0.220 UJL	<0.260 UJL	<0.240	<0.280	<0.250 UJL	<0.280
Calcium	SW6000/7000 Series	_	—	_	mg/kg	879	1360	1930	1350	2150	2670
Chromium	SW6000/7000 Series	25	MTG	_	mg/kg	5.10	5.00	8.70	9.60	6.90	16.0
Cobalt	SW6000/7000 Series		—	0.14	mg/kg	3.40	3.80	7.50	4.60	5.20	11.8
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	10.9 JH	11.4 JH	16.5 JK	11.9 JK	12.2	24.7 JK
Iron	SW6000/7000 Series	_	—	200	mg/kg	7760	9010	16900	10400	12700	25000
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	18.0 JK	25.2 JK	5.60 JK	4.00 JK	598	17.6 JK
Magnesium	SW6000/7000 Series	—	—	—	mg/kg	1250	1320	2490 JK	1510 JK	1380	4130 JK
Manganese	SW6000/7000 Series		—	100	mg/kg	229	240	461	357	805	737
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	<0.0200	<0.0200	0.0400 JH	0.0400 JH	<0.0200 UJL	0.0600 JH
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	12.3	13.2	22.2	15.5	14.7	33.3
Potassium	SW6000/7000 Series	—	—	—	mg/kg	227	278	473	340	281 J	756
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	<0.350	<0.410	<0.380	<0.440	<0.410	<0.440
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<0.180 UJL	<0.210 UJL	<0.200	<0.230	<0.210 UJL	<0.230
Sodium	SW6000/7000 Series		—	_	mg/kg	<60.4	<70.4	<65.5	<75.6	61.4 J	<76.2
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	<0.260	<0.300	<0.280	<0.320	<0.290 UJL	<0.320
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg	9.00	10.4	18.5 JK	11.0 JK	10.8 JH	26.8 JK
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg	39.6	64.7	51.0	35.3	32.0	78.9

Table F-2eSummary of Soil Sample Results - Metals

						1996 E&E	2001 Jacobs
			PCL			SB-50	_
Analyte	Analytical Method	PCL	Source	твс	Units	96-UMT-214-SB	UM-A110102
Aluminum	SW6000/7000 Series	_	_	50	mg/kg	3260	_
Antimony	SW6000/7000 Series	3.6	MTG	0.142	mg/kg	<5.60	—
Arsenic	SW6000/7000 Series	3.9	MTG	5.7	mg/kg	3.40	—
Barium	SW6000/7000 Series	1100	MTG	1.04	mg/kg	222 JK	—
Beryllium	SW6000/7000 Series	42	MTG	1.06	mg/kg	0.110 J	—
Cadmium	SW6000/7000 Series	5	MTG	0.00222	mg/kg	<0.250	—
Calcium	SW6000/7000 Series				mg/kg	1230	—
Chromium	SW6000/7000 Series	25	MTG		mg/kg	6.20	_
Cobalt	SW6000/7000 Series		_	0.14	mg/kg	4.70	_
Copper	SW6000/7000 Series	460	MTG	5.4	mg/kg	11.8 JK	—
Iron	SW6000/7000 Series	_	-	200	mg/kg	11100	_
Lead	SW6000/7000 Series	400	AZDC	0.0537	mg/kg	4.70 JK	1170
Magnesium	SW6000/7000 Series	_	_	—	mg/kg	1580 JK	—
Manganese	SW6000/7000 Series		_	100	mg/kg	286	_
Mercury	SW6000/7000 Series	1.4	MTG	0.1	mg/kg	<0.0200	_
Nickel	SW6000/7000 Series	86	MTG	13.6	mg/kg	14.9	—
Potassium	SW6000/7000 Series		_		mg/kg	396	_
Selenium	SW6000/7000 Series	3.4	MTG	0.52	mg/kg	<0.390	—
Silver	SW6000/7000 Series	11.2	MTG	2	mg/kg	<0.200	_
Sodium	SW6000/7000 Series		_		mg/kg	<67.2	_
Thallium	SW6000/7000 Series	1.9	MTG	0.0569	mg/kg	<0.290	_
Vanadium	SW6000/7000 Series	960	AZDC	1.59	mg/kg	12.3 JK	_
Zinc	SW6000/7000 Series	4100	MTG	6.62	mg/kg	33.5	_

Table F-2e Summary of Soil Sample Results - Metals

Table F-2e Summary of Soil Sample Results - Metals

Notes:

H, J, K, L, U Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

Column headings:	Event
	Location (LOCID)
	Sample ID

- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements
- TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards
- mg/kg milligrams per kilogram
- MTG 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Migration to Groundwater
- AZDC 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Arctic Zone Direct Contact
 - No PCL/TBC was available for this analyte
 - < Result is less than the listed reporting limit
- **bold** Result or reporting limit exceeds the PCL
- bold shaded Result exceeds PCL (regulatory exceedance)

 Table F-3a

 Summary of Sediment Sample Results - Fuels and Fuel-related Compounds

						1986 E&E	1996 E&E	1996 E&E	1996 E&E	1996 E&E	1998 E&E
Analyte	Analytical Method	PCL	PCL Source	твс	Units	02SD	LA 96-UMT-230-SD	LB 96-UMT-232-SD	LC 96-UMT-224-SD	LC 96-UMT-225-SD	— 98-UMT-621-SD
Diesel range organics	AK 102	230	OFMTG	_	mg/kg	10	—	—	—	—	35 J,AH
Residual range organics	AK 103	8300	OFIG	_	mg/kg	—	31 JK	<50 UJK	14 JK	48 JK	_

 Table F-3a

 Summary of Sediment Sample Results - Fuels and Fuel-related Compounds

						1998 E&E					
Analyte	Analytical Method	PCL	PCL Source	твс	Units	— 98-UMT-622-SD	— 98-UMT-623-SD	— 98-UMT-624-SD	— 98-UMT-625-SD	— 98-UMT-626-SD	— 98-UMT-627-SD
Diesel range organics	AK 102	230	OFMTG	_	mg/kg	<2.3	<2.2	54 J,AH	10 J,AH	9.6 J	<2.7
Residual range organics	AK 103	8300	OFIG	_	mg/kg	_	_	_	_	_	—

 Table F-3a

 Summary of Sediment Sample Results - Fuels and Fuel-related Compounds

						1998 E&E					
Analyte	Analytical Method	PCL	PCL Source	твс	Units	— 98-UMT-628-SD	— 98-UMT-629-SD	— 98-UMT-630-SD	— 98-UMT-631-SD	— 98-UMT-632-SD	— 98-UMT-633-SD
Diesel range organics	AK 102	230	OFMTG	_	mg/kg	<2.5	<2.4	<2.3	12 J,AH	10 J,AH	<2.6
Residual range organics	AK 103	8300	OFIG	_	mg/kg		_	_	_	—	_

						1998 E&E	1998 E&E	1998 E&E
Analyte	Analytical Method	PCL	PCL Source	твс	Units	— 98-UMT-634-SD	— 98-UMT-635-SD	— 98-UMT-636-SD
Diesel range organics	AK 102	230	OFMTG	_	mg/kg	9.2 J,AH	18 J,AH	11 J,AH
Residual range organics	AK 103	8300	OFIG	_	mg/kg		_	_

 Table F-3a

 Summary of Sediment Sample Results - Fuels and Fuel-related Compounds

Table F-3a Summary of Sediment Sample Results - Fuels and Fuel-related Compounds

Notes:

AH, J, K Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

Column headings:	Event
-	Location (LOCID)
	Sample ID

- PCL Chemical-specific Applicable or Relevant and Appropriate Requirements
- TBC To Be Considered, non-promulgated advisories, guidance, or proposed standards
- mg/kg milligrams per kilogram
- OFIG 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Ingestion
- OFMTG 18 AAC 75.341 (April 2012) Method Two Tables B1 and B2 Soil Cleanup Levels: Over 40 Inch Zone, Migration to Groundwater
 - No PCL/TBC was available for this analyte
 - < Result is less than the listed reporting limit
 - **bold** Result or reporting limit exceeds the PCL
- **bold shaded** Result exceeds PCL (regulatory exceedance)

 Table F-5a

 Summary of Groundwater Sample Results - Fuels and Fuel-related Compounds

						1996 E&E	1996 E&E	1996 E&E	1996 E&E	1996 E&E	1996 E&E
	Analytical		PCL			MW-3	MW-4	MW-5	MW-6	MW-7	MW-7
Analyte	Method	PCL	Source	TBC	Units	96-UMT-349-GW	96-UMT-332- GW	96-UMT-333-GW	96-UMT-334-GW	96-UMT-335-GW	96-UMT-351-GW
Gasoline range organics	AK 101	2.2	С	_	mg/L	<0.10	<0.10	0.12	0.76	<0.10	<0.10
Diesel range organics	AK 102	1.5	С	_	mg/L	0.18	76	0.34	4.0	0.22	<0.10

						1996 E&E	1997 E&E	1997 E&E	1997 E&E	1997 E&E	1997 E&E
Analyte	Analytical Method	ARAR	ARAR Source	твс	Units	MW-8 96-UMT-336-GW	MW-21 97-UMT-290-GW	MW-22 97-UMT-286-GW	MW-23 97-UMT-285-GW	MW-24 97-UMT-291-GW	MW-25 97-UMT-287-GW
Gasoline range organics	AK 101	2.2	С	_	mg/L	0.48	_	_	_	_	-
Diesel range organics	AK 102	1.5	С	-	mg/L	<0.10	<0.26	<0.25	<0.26	<0.25	<0.25

Analyte	Analytical Method	ARAR	ARAR Source	твс	Units	1997 E&E MW-26 97-UMT-283-GW	1997 E&E MW-27 97-UMT-280-GW	1997 E&E MW-27 97-UMT-281-GW	1997 E&E MW-3 97-UMT-289-GW	1997 E&E MW-4 97-UMT-284-GW	1997 E&E MW-7 97-UMT-288-GW
Gasoline range organics	AK 101	2.2	С	_	mg/L	_	_	_	_	_	_
Diesel range organics	AK 102	1.5	С	_	mg/L	<0.25	<0.27	<0.26	<0.26	0.73	<0.25

Analyte	Analytical Method	ARAR	ARAR Source	твс	Units	1998 E&E MW-22 98-UMT-804-GW	1998 E&E MW-23 98-UMT-803-GW	1998 E&E MW-24 98-UMT-800-GW	1998 E&E MW-7 98-UMT-801-GW	1998 E&E MW-7 98-UMT-802-GW	1999 E&E MW-23 99-UMT-002-GW
Gasoline range organics	AK 101	2.2	С	_	mg/L	_	_	_	_	_	_
Diesel range organics	AK 102	1.5	С	-	mg/L	<0.098	<0.098	<0.11	0.12 AE	0.15 AE	<0.105

						1999 E&E	1999 E&E
Analyte	Analytical Method	ARAR	ARAR Source	твс	Units	MW-24 99-UMT-001-GW	MW-7 99-UMT-003-GW
Gasoline range organics	AK 101	2.2	С	—	mg/L	_	_
Diesel range organics	AK 102	1.5	С	_	mg/L	0.0890	0.107

Table F-5a Summary of Groundwater Sample Results - Fuels and Fuel-related Compounds

Notes:

AE Flags are carried over from the original reports, and in some cases were undefined. Refer to original report for flag definitions.

Column headings:	Event Location (LOCID) Sample ID
PCL	Chemical-specific Applicable or Relevant and Appropriate Requirements
TBC	To Be Considered, non-promulgated advisories, guidance, or proposed standards
mg/L	milligrams per liter
C	18 AAC 75.345 (April 2012) - Table C Groundwater Cleanup Levels
_	No PCL/TBC was available for this analyte

- < Result is less than the listed reporting limit
- bold Result or reporting limit exceeds the PCL

bold shaded Result exceeds PCL (regulatory exceedance)

APPENDIX G

BACKGROUND STATISTICAL COMPARISON – ARSENIC AND ALUMINUM IN SOIL AND SURFACE WATER

Table G-1Background Statistical ComparisonArsenic and Aluminum in Soil and Surface Water

Analyte	Medium	Sample Type	Concentration	Units
Arsenic	Soil	Site	5.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	4.4	mg/kg
Arsenic	Soil	Site	2.0	mg/kg
Arsenic	Soil	Site	6.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	5.0	mg/kg
Arsenic	Soil	Site	1.0	mg/kg
Arsenic	Soil	Site	2.0	mg/kg
Arsenic	Soil	Site	7.0	mg/kg
Arsenic	Soil	Site	6.0	mg/kg
Arsenic	Soil	Site	5.0	mg/kg
Arsenic	Soil	Site	3.0	mg/kg
Arsenic	Soil	Site	3.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	3.0	mg/kg
Arsenic	Soil	Site	3.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	4.0	mg/kg
Arsenic	Soil	Site	3	mg/kg
Arsenic	Soil	Site	8	mg/kg
Arsenic	Soil	Site	8.40	mg/kg
Arsenic	Soil	Site	1.90	mg/kg
Arsenic	Soil	Site	1.80	mg/kg
Arsenic	Soil	Site	5.70	mg/kg
Arsenic	Soil	Site	5.10	mg/kg
Arsenic	Soil	Site	1.80	mg/kg
Arsenic	Soil	Site	2.60	mg/kg
Arsenic	Soil	Site	3.90	mg/kg
Arsenic	Soil	Site	5.70	mg/kg
Arsenic	Soil	Site	3.50	mg/kg
Arsenic	Soil	Site	3.90	mg/kg
Arsenic	Soil	Site	6.80	mg/kg
Arsenic	Soil	Site	3.40	mg/kg
Arsenic	Soil	Background	6.4	mg/kg
Arsenic	Soil	Background	5.2	mg/kg
Arsenic	Soil	Background	5.8	mg/kg
Arsenic	Soil	Background	4.0	mg/kg
Arsenic	Soil	Background	5.3	mg/kg

Table G-1 Background Statistical Comparison Arsenic and Aluminum in Soil and Surface Water

Analyte	Medium	Sample Type	Concentration	Units
Arsenic	Soil	Background	4.7	mg/kg
Aluminum	Surface water	Site	0.0243 J	mg/L
Aluminum	Surface water	Site	<0.0239	mg/L
Aluminum	Surface water	Site	0.0302 J	mg/L
Aluminum	Surface water	Site	<0.0239	mg/L
Aluminum	Surface water	Site	0.136	mg/L
Aluminum	Surface water	Site	0.0242 J	mg/L
Aluminum	Surface water	Site	0.0330 J	mg/L
Aluminum	Surface water	Site	<0.0239	mg/L
Aluminum	Surface water	Background	<0.0240	mg/L
Aluminum	Surface water	Background	<0.0241	mg/L
Aluminum	Surface water	Background	<0.0242	mg/L
Aluminum	Surface water	Background	<0.0243	mg/L
Aluminum	Surface water	Background	0.0304 J	mg/L
Aluminum	Surface water	Background	0.167	mg/L
Aluminum	Surface water	Background	0.377	mg/L
Aluminum	Surface water	Background	0.385	mg/L

Notes:

milligrams per kilogram milligrams per liter mg/kg

mg/L

estimated value J

ProUCL 4.1 Output

Wilcoxon-Mann-Whitney Site vs Background Comparison Test for Full Data Sets without NDs

User Selected Options

Sheet2.wst
OFF
95%
0
Site or AOC Mean/Median Less Than or Equal to Background Mean/Median (Form 1)
Site or AOC Mean/Median Greater Than Background Mean/Median

Area of Concern Data: Arsenic_Project Background Data: Arsenic_BKG

Raw Statistics			
	Site	Background	
Number of Valid Observations	37	6	
Number of Distinct Observations	19	6	
Minimum	1000	4000	
Maximum	8400	6400	
Mean	4132	5233	
Median	4000	5250	
SD	1735	835.9	
SE of Mean	285.2	341.2	

Wilcoxon-Mann-Whitney (WMW) Test

H0: Mean/Median of Site or AOC <= Mean/Median of Background

Site Rank Sum W-Stat 758 WMW Test U-Stat -1.98 WMW Critical Value (0.050) 1.645 P-Value 0.976

Conclusion with Alpha = 0.05

Do Not Reject H0, Conclude Site <= Background P-Value >= alpha (0.05)

ProUCL 4.1 Output

Wilcoxon-Mann-Whitney Site vs Background Comparison Test for Data Sets with Non-Detects

User Selected Options

From File	SW_Aluminum.wst
Full Precision	OFF
Confidence Coefficient	95%
Substantial Difference (S)	0
Selected Null Hypothesis	Site or AOC Mean/Median Less Than or Equal to Background Mean/Median (Form 1)
Alternative Hypothesis	Site or AOC Mean/Median Greater Than Background Mean/Median

Area of Concern Data: PS_AI Background Data: BKG_AI

Raw Statistics			
	Site	Background	
Number of Valid Data	8	8	
Number of Non-Detect Data	3	4	
Number of Detect Data	5	4	
Minimum Non-Detect	23.9	23.9	
Maximum Non-Detect	23.9	23.9	
Percent Non detects	37.50%	50.00%	
Minimum Detected	24.2	30.4	
Maximum Detected	136	385	
Mean of Detected Data	49.54	239.9	
Median of Detected Data	30.2	272	
SD of Detected Data	48.48	172.3	

Wilcoxon-Mann-Whitney Site vs Background Test Wilcoxon-Mann-Whitney (WMW) Test

H0: Mean/Median of Site or AOC <= Mean/Median of Background

Site Rank Sum W-Stat 64 WMW Test U-Stat 28 WMW Critical Value (0.050) 48 Approximate P-Value 0.682

Conclusion with Alpha = 0.05

Do Not Reject H0, Conclude Site <= Background