



Bureau of Land Management

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Environmental Assessment

Removal and disposal of dry well and contaminants (PCBs) from the maintenance shop facilities on the Bureau of Land Management administrative site at Campbell Tract, Anchorage, Alaska.

Replace roof drainage system of the maintenance shop facilities on the Bureau of Land Management's administrative site at Campbell Tract, Anchorage, Alaska.

The United States Department of the Interior
Bureau of Land Management
Anchorage Field Office
AK-040-07-EA-014



Location:

T. 12 N., R. 3 W., Sec. 3, NE ¼ SW ¼, Seward Meridian, Alaska
Campbell Tract, Anchorage, Alaska

Prepared By:

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I. INTRODUCTION

The Bureau of Land Management (BLM) administrative and support center at Campbell Tract, Anchorage, Alaska includes a shop facility with roof and floor drains that for forty years drained into a dry well located next to the building. During 2004, the shop's floor drains were disconnected from the dry well, re-routed through a modern oil-water separator, and connected to a sewer system. The roof drains remain connected to the dry well. Recent analysis of sludge in the dry well indicates that the sludge contains various contaminants including PCBs, *see* May 24, 2004 report by URS Corporation, attached and incorporated herein as if fully set forth.

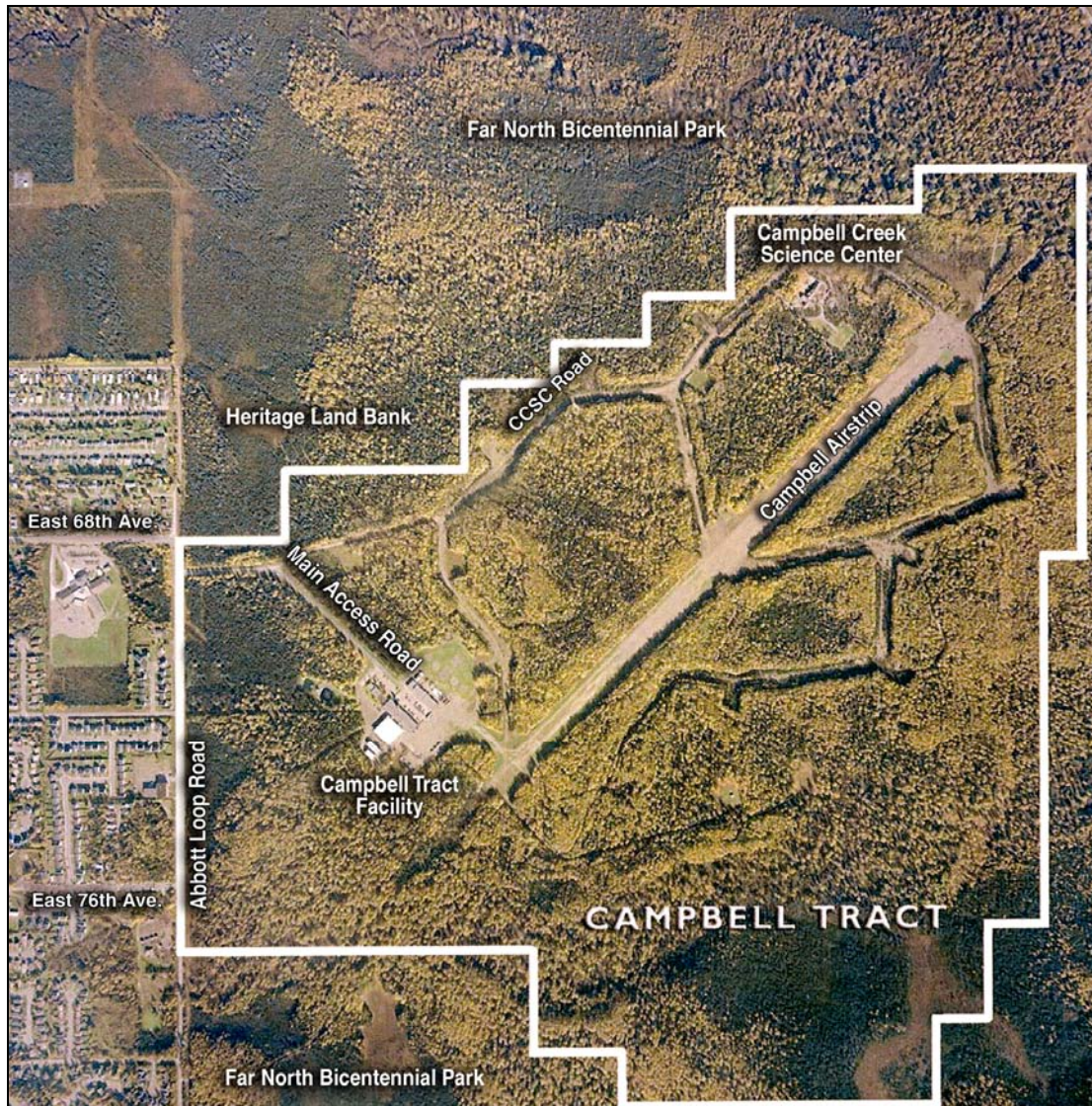


Figure 1



Figure 2

- A. Purpose and Need for the Proposed Action:
 The analysis revealed that eight Resource Conservation and Recovery Act (RCRA), metals, fuel related compounds or hydrocarbons (oil), and PCB's (Aroclor-1254) are present. None of the metals were found in high enough concentrations to be regulated as a RCRA hazardous waste. The concentration of PCBs is below thresholds for regulation under the Toxic Substances Control Act. However the oil, PCB's and metals, arsenic, cadmium, chromium, and selenium, were found to be in concentrations that exceed Alaska Department of Environmental Conservation cleanup levels. Consequently, the sludge and dry well require disposal and/or treatment action according to Title 18 Alaska Administrative Code, Chapter 75, Oil and Hazardous Substances Pollution Control.
- B. Land Status:
 The dry well is located within the NE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 3, Township 12 North, Range 3 West., Seward Meridian, Alaska, an area of public land withdrawn for BLM administrative purposes under PLO 7471, dated November 15, 2000.

C. Conformance with Land Use Plan:

Removal and replacement of the dry well and drain systems with modern facilities is maintenance. Maintenance is normally regarded as an activity, which would not have a significant effect on the human environment¹; however, the presence of contaminants warrants development of an environmental assessment to determine the potential for a significant impact on the human environment.

The June 1988 Management Plan for the Campbell Tract Facility (CTF) does not address maintenance issues. This environmental analysis assesses the impacts of the proposed action and provides a basis for a decision on the proposal, 43 CFR 1610.8 (b)(1).

D. Relationship to Statutes, Regulations, Policies, Plans or Other Environmental Analyses:

As stated above, none of the pollutants detected were at concentrations which require action under federal standards found in the Code of Federal Regulation Title 40, Protection of Environment. However federal facilities are required by the Federal Facilities Compliance Act to comply with State and local environmental regulations. Several contaminants found in the dry well sludge do exceed State of Alaska action levels, therefore cleanup will be conducted under Alaska Department of Environmental Conservation (ADEC) oversight.

II. PROPOSED ACTION AND ALTERNATIVE

A. Proposed Action:

A BLM environmental contractor will excavate the Campbell Tract Facility Maintenance Shop dry well, properly dispose of the dry well vault structure and its contents, and install a replacement below-ground, discharge system for the building's roof drain. The contractor will develop an ADEC approved workplan which will include a Health and Safety Plan and Sampling Quality Assurance Plan. The excavated materials may be temporarily stockpiled in a secure area on CTF while awaiting disposal. To prevent spread of contamination from the stockpiled materials, the stockpile will be constructed as prescribed in 18 AAC 75. Fieldwork will be performed as seasonal conditions permit; to be completed before end of the 2007 field season. Fieldwork is anticipated to take 2-5 days, during which time the open excavation may measure 40 or more feet across and could reach a depth of 25 or more feet. The excavation will be completely backfilled and graded to approximate pre-excavation appearance. BLM's contractor will provide all materials, labor, and equipment to complete this job, to include developing all required applications, notices, and plans, and gaining regulatory agency approval of the work plan and final closure report. Excavated

¹ United States Department of the Interior, Department Manual, Part 516, Chapter 2, Appendix 1, Paragraph 1.7.

material will be disposed of by the contractor in an authorized manner. *See* Statement of Work, Campbell Tract Facility Dry Well Removal, Attached and incorporated herein as if fully set forth.

B. No Action Alternative:

The no action alternative is to leave the dry well and the contamination in the ground and to continue to use the dry well for roof water run off.

III. AFFECTED ENVIRONMENT

The project area is a gravel parking area immediately adjacent to the maintenance shop.

A. Critical Elements of the human environment:

1. The following Critical Elements of the human environment are not present or will not be affected by the Proposed Action or the No Action Alternative and will receive no further discussion in this analysis:

- a. Air Quality
- b. Areas of Critical Environmental Concern
- c. Environmental Justice
- d. Farm Lands (prime or unique)
- e. Floodplains
- f. Invasive, non-native species
- g. Native American Religious Concerns
- h. Wetlands/Riparian Zones
- i. Wild and Scenic Rivers
- j. Wilderness

k. Cultural Resources:

The WWII footprint of airstrip, taxiways and parking aprons on Campbell Tract (ANC-1384) has been determined to be eligible to the National Register of Historic Places. However the Area of Potential Effect does not lie within the historic WWII footprint and should have no impacts to cultural resources.

l. Subsistence:

Although the Campbell Tract meets the definition of “Federal land” under Section 102 (2) of the Alaska National Interest Lands Conservation Act and the effects of the proposed action are subject to the subsistence provisions of Title VIII of the Alaska National Interest Lands Conservation Act, the Campbell Tract is closed to the subsistence taking of wildlife pursuant to federal subsistence regulations. Consequently, the proposed action will not have an effect on subsistence uses and needs. No Further analysis is necessary at this time.

m. Threatened & Endangered Species:

There is no reason to believe that:

1. an endangered or a threatened species is present in the area affected by the proposed action;
2. implementation of the proposed action will jeopardize the continued existence of an endangered or threatened species;
3. implementation of the proposed action will result in the destruction or adverse modification of critical habitat of such species;
4. implementation of the proposed action will jeopardize the continued existence of any species proposed to be listed as endangered or threatened;
5. implementation of the proposed action will result in destruction or adverse modification of critical habitat proposed to be designated for such species;

therefore, no consultation with the U.S. Fish and Wildlife Service is considered necessary pursuant to Section 7 of the Endangered Species Act of 1973, 16 U.S.C. §1536.

2. The following critical elements of the human environment are present and may be affected by the Proposed Action or the No Action Alternative:

a. Wastes, Hazardous/Solid

Wastes, which are hazardous to human health and the environment, are present inside the dry well vault and in the soils immediately surrounding the vault. The 2004 dry well investigation included soil sampling outside the dry well vault. Three soil borings were advanced around the dry well perimeter to determine if pollutants discharged into the dry well resulted in contamination of the subsurface soils outside the dry well. Soil borings were made on three sides of the dry well at 6, 3, and 5 feet distance from the dry well. The borings were advanced to depths of 22, 23, and 27 feet below ground surface respectively. Samples were collected from the borings at 2.5-foot intervals. Oil and PCBs were not detected in any sample. Arsenic and chromium were detected in concentrations that are about average for naturally occurring background levels in the area. It is therefore believed that any migration of contaminants from the dry well has affected only immediately surrounding soils.

b. Water Quality, Surface/Ground

The BLM owns and operates a Class A (transient/non-community) water system on Campbell Tract. The system consists of three wells to supply

year-round needs for staff and visitors. One well is at the Campbell Creek Science Center, the other two are located at the main office and facilities complex. Well depths range up to 349 feet below ground surface and draw water from a confined aquifer. In 2001 the Alaska Department of Environmental Conservation rated the water system as having a low overall vulnerability for contamination.

The soil borings made as part of the 2004 investigation encountered groundwater saturated soils at between 15 and 22.5 feet below ground surface. Silt was encountered at 22 to 23 feet below ground surface and probably acts as an aquatard; retarding or preventing downward flow of surface water infiltration and water discharged to the dry well. Water samples collected from the borings were “non-detect” for any contaminant tested for.

B. Non-Critical Elements or Other Resources:

The following non-critical elements of the human environment or other resource values are present and may be affected by the Proposed Action or the No Action Alternative:

1. Human health and safety:

Risk to human health from the presence of the pollutants in the dry well can be assessed by looking at exposure pathways. Exposure pathways are Inhalation, Ingestion, and Migration to Groundwater. Because the pollutants are contained below ground level, risk of human exposure by inhalation or ingestion is not likely. The migration to groundwater pathway is believed to be incomplete because water samples taken from saturated soils immediately outside the dry well tested negative for presence of the pollutants.

2. Soils

Soils at the project site are of Cryorthents and urban land (taxonomic classification) found on 0 to 5 percent slopes. This soil has formed from glacial sediments parent material, is very gravelly sandy loam, and is found on outwash and till plains at elevations between 33 to 902 feet. Once the organic mat is removed, erosion hazard is caused by water (slight) and wind (moderate). This soil is somewhat excessively drained resulting in low runoff potential. Depth to water table is approximately greater than 72 inches with a water holding capacity 4.7 inches. Management considerations for this soil are high gravel content, high sand content, frost action, and permeability, (NRCS, 2001).

3. Recreation

The site of the proposed action is within the administrative site zone of the Campbell Tract Facility. Unauthorized recreational users may pass near the project site although the area is not open to recreational use.

4. Visual Resources

Visual impacts resulting from the proposed action will be temporary and will only affect CTF employees and clients.

IV. ENVIRONMENTAL CONSEQUENCES

A. Impacts of the Proposed Action:1. Critical Elements of the human environment:a. Wastes, Hazardous/Solid:

Removal of the pollutants will bring the dry well into compliance with applicable federal and state laws. The contaminants will be placed in a permitted treatment or disposal facility.

b. Water Quality, Surface/Ground

The excavation of soil at a depth of 25 feet will result in ground water seepage into the pit and possibly direct exposure to contaminants associated with the use of mechanized equipment, i.e. oil, gas, solvents. Back filling this pit will cause localized and temporary changes to surface water to groundwater movement (conductivity) due to soil disturbance.

2. Non-Critical Elements of the human environment:a. Human Health and Safety:

Removal of the pollutants will eliminate the potential for injury to human health from migration of the pollutants to drinking water wells.

b. Soils:

This project will cause localized and temporary changes to the soil profile including; increased conductivity and increased porosity. These alterations in soil characteristics will continue until natural processes reach equilibrium.

c. Recreation:

The project area is not open to recreational use. Impacts to recreation use on Campbell Tract are not expected. The site may pose somewhat of an attractive nuisance during excavation.

d. Visual Resources:

No lasting impacts to visual resources are anticipated by the proposed action, as the ground will be restored to its original condition upon completion of the action.

B. Impacts of the No Action Alternative:

1. Critical Elements of the human environment:

a. Wastes, Hazardous/Solid:

Leaving the contaminants in place and continuing to use the existing dry well leaves the BLM open to enforcement by the ADEC for failure to comply with State and federal law – discharge of oil and hazardous substances without permit.

b. Water Quality, Surface/Ground

Though direct contamination of groundwater from fluids used in mechanized equipment operation will be eliminated, the potential threat of PCBs contamination of groundwater resources will still exist.

2. Non-Critical Elements of the human environment:

a. Human Health and Safety:

Human health and quality of life could be negatively impacted by leaving the pollution in place. The pollutants could migrate into existing drinking water sources.

b. Soils:

No soil disturbance will result from this alternative.

c. Recreation:

No impacts to recreation will result from this alternative.

d. Visual Resources:

No impacts to visual resources will result from this alternative.

C. Mitigation Measures:

To ensure all aspects of the work are conducted in accordance with applicable laws, regulations, and best management practices, only an environmental contractor who is on the BLM Alaska Hazardous Materials Response contract will be utilized. The contractor will operate under their BLM approved Quality Assurance Plan. Work will be inspected by a dully authorized BLM Project Inspector. Regulatory oversight will be performed by the ADEC.

A safety fence and warning sign located at the project site is appropriate to protect employees and casual users of Campbell Tract.

V. CONSULTATION AND COORDINATION

A. Persons and Agencies Consulted:

Bruce Seppi, Wildlife Specialist, BLM, Anchorage Field Office
Donna Redding, Cultural Resource Specialist, Anchorage Field Office
James F. Moore, NEPA Coordinator, Anchorage Field Office
URS Corporation, 2700 Gambell Street, Suite 200, Anchorage, Alaska 99503

B. List of Preparers:

Larry Beck, Environmental Protection Specialist, Anchorage Field Office

Reference

NRCS, 2001. Soil Survey of Anchorage Area, Alaska. United States Department of Agriculture, Natural Resources Conservation Service.