



**ANDERSEN AFB
GUAM**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 582

ACTION MEMORANDUM

1.0 Purpose

The purpose of this action memorandum is to request and document approval of the proposed removal action described herein for Site 34/Polychlorinated Biphenyl (PCB) Storage Area at Andersen Air Force Base. This action is requested in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120 Federal Facility Agreement, Administrative Docket Number 93-17, entered between the United States Environmental Protection Agency and the United States Air Force. Final signatures were obtained on the agreement document on March 30, 1997.

2.0 Site Conditions and Background

The site is classified as non-time critical and approval for the removal action is requested. A historical overview of the Andersen AFB facility is presented in 2.2.1 of the *Final Basewide Quality Assurance Project Plan for Andersen Air Force Base, Guam*, October 1997. A general description of Site 34/PCB Storage Area is presented below. The description of the site is based on historical information provided by the Air Force and the *Final Engineering Evaluation/Cost Analysis Report for IRP Site 34/PCB Storage Area for Andersen Air Force Base, Guam*, EA Engineering, Science, and Technology, Inc., April 1999.

2.1 Site Description

2.1.1 Removal Site Evaluation

Site 34/PCB Storage Area is composed of a fenced-in concrete pad (Pad 20013) adjacent to Building No. 20011 and an unfenced concrete pad to the north of Pad 20013. Pad 20013 was originally constructed in May 1958 as a military dog kennel. According to records, the earliest use of Pad No. 20013 for storage of PCB-containing transformers appears to be in 1976, when the U.S. Navy Public Works Center (USN-PWC) initiated a program to replace equipment containing PCB dielectric fluid with mineral oil-filled equipment. However, CE Electrical Shop and former USN-PWC personnel reported that the northern pad, not Pad No. 20013 was utilized as a storage area for transformers prior to disposal. The northern pad is currently unused, and it is not known when the use of the northern pad may have been discontinued. Pad No. 20013 is still in use by the CE Electrical Shop for the storage of supplies.

Field investigations and environmental sampling at Site 34/PCB Storage Area were performed according to the Work Plan Addendum to Operable Unit 6 for Operable Unit 5, and the Basewide Remedial Investigation/Feasibility Study Standard Operating Procedures (SOP). The field investigation was conducted between January and November 1997. The fieldwork included site reconnaissance/detailed site inventory, wipe sampling, surface soil sampling and a topographic survey.

Of the twelve surface soil samples collected in June 1997, nine samples exceeded the EPA Region IX Residential Preliminary Remediation Goal (PRG) for total PCBs in soil. Additional samples were collected in September and November 1997 to characterize the horizontal extent of PCB contamination

None of the twelve wipe samples collected exceeded the Toxic Substances Control Act (TSCA) standards for PCB wipe samples.

The results are provided in the *Final Engineering Evaluation/Cost Analysis Report for IRP Site 34/PCB Storage Area for Andersen Air Force Base*, Guam, EA Engineering, Science, and Technology, Inc., April 1999.

2.1.2 Physical Location

Site 34/PCB Storage Area is located in the northern section of Guam, on the Main Base Operable Unit, Andersen AFB, at the intersection of Perimeter Road and Access Road. There are no wetland communities or surface water bodies on Andersen AFB. Although there are several threatened and endangered species within Andersen AFB, none of the critical habitats for these species include the location of Site 34/PCB Storage Area.

2.1.3 Site Characteristics

Site 34/PCB Storage Area lies on Mariana Limestone, an undulating limestone plateau with surficial karst features. Pad 20013 is currently used for storage for the CE Electrical Shop. The site is owned by the United States Air Force. There have been no removal actions conducted at this site to date.

2.1.4 Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Impact from PCBs on groundwater is unlikely as PCBs are highly immobile in soil and the depth to groundwater in the vicinity of the site is approximately 610 feet. Following data validation of the analytical results, a human health risk assessment (HHRA) was conducted to evaluate potential human health risks associated with exposures to surface soil, subsurface soil, and air containing constituents for potential concern (COPCs) at, or originating from Site 34/PCB Storage Area. Potentially exposed onsite receptor populations included future construction/excavation workers, current and future commercial and industrial workers, current and future occasional users and trespassers, and future residents (adults and children).

Ingestion, inhalation, and dermal exposure routes were considered for all relevant media. Findings indicate that under the reasonable maximum exposure (RME) conditions for exposure, there are likely to be potential risks for adverse health effects other than cancer to future construction/excavation workers, current and future commercial and industrial workers, and future resident adults and children.

2.1.5 NPL Status

The EPA placed Andersen AFB on the National Priorities List (NP) on October 14, 1992 because of the potential for groundwater contamination. A Federal Facility Agreement (FFA) finalized in March 1993 between Andersen AFB, Guam Environmental Protection Agency (GEPA), and EPA provided a framework and schedule for environmental activities and requires the Air Force to retain liability and continuous rights of access until environmental cleanups are completed. The Civil Engineer Squadron, Environmental Flight administers the environmental cleanup at Andersen AFB.

2.1.6 Maps and Diagrams

Maps and diagrams presenting the site location and proposed work areas are provided in Attachment 1 to this memorandum.

2.2 Other Actions To-Date

2.2.1 Previous Actions

In addition to the investigative actions, Andersen AFB has been keeping the public regularly informed about the progress of the environmental activities through various community relations tools. These tools include the development of a Restoration Advisory Board (RAB), issuing copies of final reports for relevant IRP documents to the Robert F. Kennedy and Nieves M. Flores Memorial Libraries for public use, and the publication of fact sheets and newsletters. The RAB members include a representative from U.S. Congressional Delegate Underwood's office, local legislators, mayors, regulatory agency representatives, and community representatives. Andersen AFB personnel will continue to communicate with the public regarding the environmental activities currently being planned at Site 34/PCB Storage Area.

2.2.2 Current Actions

Andersen AFB will continue to communicate with the public regarding the environmental activities currently being planned at Site 34/PCB Storage Area.

2.3 Territorial and Local Authorities Role

2.3.1 Territorial and Local Actions To-Date

The Guam EPA counterpart is a co-signatory of the Federal Facility Agreement which outlines the program policies and goals regarding document reviews, coordination of permits, participation in quarterly Restoration Advisory Board meetings and Remedial Project Managers meetings, and other related interaction with the Base. Responses to comments generated from reports are prepared by the installation.

2.3.2 Potential for continued Territorial/Local Response

GEPA maintains their involvement in all decision making regarding the remedial actions conducted at this site through the review of all work plans and final reports and participation on the RAB. GEPA will also maintain involvement by participating in the quarterly Remedial Project Manager (RPM) meetings.

3.0 Threats to Public Health, Welfare or the Environment, and Statutory and Regulatory Authorities

3.1 Threats to Public Health or Welfare

The remedial investigation and risk screening for Site 34/PCB Storage Area indicates the presence of PCB (Aroclors 1254 and 1260) as site-specific COPCs.

3.2 Threats to the Environment

Site 34/PCB Storage Area contains two concrete pads, one pad is fenced and contains little on-site vegetation or habitat that would be expected to attract animal life. Because of the small site size and the lack of appropriate ecological habitat at Site 34/PCB Storage Area, the exposure pathway to potential ecological receptors is incomplete.

4.0 Endangerment Determination

Actual or threatened releases of pollutants and contaminants from the site, if not addressed by implementing the removal action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

5.0 Proposed Actions

5.1 Proposed Action Description

Areas containing PCBs above the Removal Goal Options for the Resident Child Scenario (RGOs) will be excavated to a depth of approximately one foot or until concentrations are below the RGOs. Waste characterization of the excavated soil will be conducted to determine where the soil will be disposed. Soil will be disposed at the base landfill only if it is not a hazardous waste. Otherwise, the soil will be disposed of through DRMO at an off-island disposal facility.

5.2 Contribution to Remedial Performance

The proposed removal action is expected to complete the cleanup of Site 34/PCB Storage Area. No further action beyond the removal action is anticipated.

5.3 Applicable or Relevant and Appropriate Requirements

The removal action at Site 34/PCB Storage Area will be conducted as part of the Installation Restoration Program (IRP). Requirements of the IRP have been developed and modified to ensure that the Department of Defense (DOD) complies with federal applicable or relevant and appropriate requirements (ARARs) of the Resource Conservation and Recovery Act (RCRA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Superfund Amendment and Reauthorization Act (SARA).

5.4 Project Schedule

Initial site preparation work is scheduled to begin in October 1999 with an anticipated completion date of 31 March 2001 for the final Remediation Verification Report.

6.0 Outstanding Policy Issues

No outstanding policy issues exist for the proposed removal action at Site 34/PCB Storage Area.

7.0 Enforcement

The removal action at Site 34/PCB Storage Area is being initiated by the United States Air Force who is identified as the potentially responsible party (PRP). The Air Force is dedicated to performing this removal action in the most prompt and expeditious manner possible.

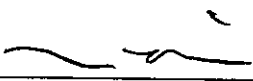
8.0 Recommendation

This decision document represents the selected removal action for Site 34/PCB Storage Area, Main Base Operable Unit, Andersen Air Force Base, Guam, developed in accordance with the Comprehensive Environmental Response, compensation, and Liability Act (CERCLA) as amended, and not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the administrative record for the site.



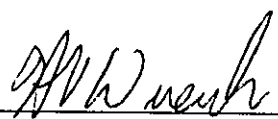
United States Air Force

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United States Environmental Protection Agency

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