



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Environmental Conservation

SPILL PREVENTION & RESPONSE  
Contaminated Sites Program

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June 24, 2022

NorthLink Aviation  
ATTN: Sean Dolan, Chief Executive Officer  
549 W. International Airport Road, Ste A10-370  
Anchorage, AK 99518-1113

### **RE: ANC South Airpark Cargo Improvements Draft Environmental Assessment**

Dear Mr. Nolan:

The Alaska Department of Environmental Conservation (DEC), Division of Spill Prevention and Response (SPAR), Contaminated Sites Program has reviewed the Draft Environmental Assessment (EA) for the Northlink Aviation South Airpark Cargo Improvement project. The EA notes the presence of contaminated sites in the vicinity of the project which are under the jurisdiction of DEC SPAR. Comments to the EA follow.

- 1) Section 3.3 of the EA notes the presence of the Anchorage International Airport (AIA) Fire Training Pit contaminated site adjacent to the project area, then states that additional contaminated sites are located in the vicinity but are not anticipated to affect the project. The DEC recommends inclusion of the Kulis ANG – Basewide PFAS site due to the presence of undelineated groundwater contamination. The future Taxiway Zulu extension noted as being connected to this project is on the former Kulis Air National Guard (ANG) base and PFAS have been detected in soils above regulatory standards within the Taxiway Zulu project area.
- 2) On page 18 of the draft EA, text describes previous soil and groundwater sampling efforts in the proposed project area detected PFAS below current regulatory levels for PFOS and PFOA. While this statement is accurate, the DEC notes that these standards may change in the future following the US Environmental Protection Agency's recent announcement of updated toxicity information and lower reference doses and advisory levels.
- 3) On page 38, section 3.7.1.2, the report states that limited published data exists regarding groundwater within the project area, and states that groundwater flows west-northwest in the project vicinity. While this statement is generally correct, the DEC notes studies by JA Munter<sup>1</sup> that document groundwater conditions to the south of the airport and the proposed development area, as well as data generated by groundwater investigations for Kulis ANG<sup>2</sup>,

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<sup>1</sup> Hydrogeologic Investigation of the Sand Lake Area, Anchorage, Alaska for Sand Lake Community Council, Municipality of Anchorage, and State of Alaska Prepared by J.A. Munter Consulting, Inc. May 2021

<sup>2</sup> 2022 UFP QAPP CERCLA Remedial Investigation at Former Kulis Air Nation Guard Base, Anchorage, Alaska

both of which indicate complex groundwater flow patterns and multiple aquifers that may be connected through discontinuities in confining clay layers. These studies indicate that local groundwater gradients may flow more to the west and southwest at and near the project area.

- 4) Because groundwater investigations are incomplete for the Fire Training Pit and Kulis ANG sites, the DEC cannot evaluate the potential impacts to groundwater from the proposed project.
- 5) The DEC notes the presence of multiple domestic water supply wells in the Tanaina subdivision, just south of Raspberry Road.

DEC requests an extension of the review period to allow for site characterization and delineation of the groundwater PFAS contamination such that there's a better understanding of the hydrogeology of the site and the potential risk to domestic water supply wells.

For questions please contact Stephanie Buss, Contaminated Sites Program Manager, at [stephanie.buss@alaska.gov](mailto:stephanie.buss@alaska.gov) or (907) 465-5076.

Sincerely,



Tiffany Larson  
Director, Division of Spill Prevention and Response

cc (via email): Jason Brune, Commissioner DEC  
Emma Pokon, Deputy Commissioner DEC  
Stephanie Buss, Program Manager DEC