

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION CONTAMINATED SITES PROGRAM

SARAH PALIN, GOVERNOR

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File No.: 600.38.001

February 2, 2007

Dr. John A. Davis
Bering Straits School District
225 Polar Bear Ave.
Unalakleet, Alaska 99684

RE: Elim School
Environmental Status
Record of Decision

Dear Dr. Davis,

The Department of Environmental Conservation, Contaminated Sites Program, (ADEC) reviewed the environmental records associated with the Elim School. This site had been contaminated by the release of a hazardous substance; however, based on the information provided to date, ADEC has determined that the cleanup efforts were effective in removing the majority of the contamination and the residual contamination remaining does not pose an unacceptable risk to human health or the environment.

As a result of these efforts, no further remedial action is required at the Elim School and the site will be closed subject to the conditions outlined in this document. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the ADEC determination.

Introduction

Site Name and Location

Elim Aniquiin School
Elim, Alaska

Name and Mailing Address of Contact Party:

Dr. John A. Davis
Bering Straits School District
225 Polar Bear Ave.
Unalakleet, Alaska 99684

Database Record Key and CS file number:

ADEC Reckey # 2001320117701
CS file # 600.38.001

Regulatory authority under which the site is being cleaned up:
18 AAC 75

Background

In 2001, petroleum contaminated soil was encountered while preparing the foundation for the new school. Approximately 3,000 cubic yards of soil and fractured bedrock was removed from the site. Due to the geologic conditions at the site, further excavation was not considered practicable. Soil samples from the bottom of the excavation identified diesel range organics (DRO) up to 12,100 mg/kg. There was no benzene detected in any of the samples and the next highest DRO concentration was 75.5 mg/kg. The remaining contamination was located in bedrock fissures approximately 15 feet below ground surface (bgs).

A liner was placed over the excavated area and then filled with clean material. The school building was constructed and an air exchange system was incorporated in the final design to address potential contaminant vapor issues. The excavated soil was transported to a gravel pit outside of Elim and placed in a landfarm. In 2004, The soil was tilled and samples were collected based on visual and olfactory screening. The landfarm was divided into 8 cells with one composite sample collected from each cell and submitted for laboratory analysis. DRO was detected in three samples above ADEC cleanup levels ranging from 360 to 2,800 mg/kg. Benzene was not detected in any of the samples.

The landfarm area was then revegetated with no further active treatment planned.

Contaminants of Concern

Diesel Range Organics

Cleanup Levels

The soil cleanup levels established for this site are: 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Diesel Range Organics	250

Pathway Evaluation

The pathways evaluated at this site include the human health exposure pathways of soil ingestion and inhalation of vapors. The inhalation and ingestion pathways may be complete but the remaining contaminated soil is approximately 15 feet below ground surface so human contact with contaminated soil is unlikely. Additionally, the liner placed in the bottom of the excavation should prevent vapors from migrating to the school building, and a passive venting system has been installed to vent any potential vapors that may accumulate beneath the school.

The migration to groundwater pathway may be complete but groundwater was not encountered during the excavation and groundwater is not used as a drinking water source.

ADEC Decision

The cleanup actions conducted at the Elim School were effective in removing the majority of impacted soil. There is contamination remaining above established cleanup levels but ADEC

determined there is no unacceptable risk to human health or the environment, and this site will be conditionally closed.

This decision is subject to the following conditions:

1. A Notice of Residual Contamination will be recorded on the ADEC database to document cleanup efforts to date and the residual contamination remaining on site and at the landfarm area above the most stringent ADEC cleanup levels;
2. Any proposal to transport the contaminated soil off site from either the school or the landfarm requires ADEC approval in accordance with 18 AAC 75.325(i).

This determination is in accordance with 18 AAC 75.380(d) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Site closure (without conditions) can be achieved when soil sampling confirms that all soil meets the most stringent ADEC cleanup levels.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have questions about this closure decision, please contact William O'Connell at (907) 269-3057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Frechione".

Jim Frechione
Environmental Manager