STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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May 2, 2003

Ms. Bev Niemann
7941 Sandlewood Place, Suite 100
Anchorage, AK 99507

Re: Work Plan and the No Further Remedial Action Planned for Bethel Fuel Sales, Inc., Bethel, AK.

Dear Ms. Niemann:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the Work Plan and request for a No Further Remedial Action Planned (NFRAP) that was prepared by your consultant. The document was received via email at the ADEC on April 29, 2003. The work plan briefly summarizes the proposed activities this summer at the site. The Department approves the work plan with the understanding that the work will be performed in accordance with the requirements of the Department's "Site Cleanup Rules" (18 ACC 75.325-.390). As indicated in the work plan, two soil samples will be collected representing native soil to the east and west of the existing soil stockpile. These two samples will be analyzed for DRO, GRO, and BTEX by an ADEC approved laboratory. The work plan is conditionally approved with the following requirements. The Department requests that photographs (digital or prints) of the site be taken before and after the soil spreading to document the work. Please provide a figuring showing the locations where the two soil samples were collected with respect to the site and existing stockpile. Please provide details of the formulation of the fertilizer that will be used to amend the soil as well as the quantity used.

ADEC has determined that no further remedial action is required at this site. Please note the following information that was considered in making this determination.

- Groundwater movement is to the southeast across the site towards the Kuskokwim River.
- The nearest drinking well is ¼ mile upgradient of the site.
- There are no down gradient drinking water wells.
- Drinking water supply wells are screened below 300 feet of permafrost.
- Shallow supra-permafrost groundwater exists at the site at depths of 3 to 20 feet bgs.
- There is no hydraulic connection between the supra-permafrost groundwater and the drinking water aquifer.

Based on this information the Department approves a DRO cleanup level of 10,250 milligrams per kilograms (mg/kg) based on Table B2, Method Two for Ingestion in an Under-40 Inch Zone. Based on the information presented to date, ADEC does not consider the soil

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contamination levels of 5,300 mg/kg DRO (or below) at the site to pose a risk to human health or the environment and no further remedial action is required at this site. However, it should be noted that any contamination identified in the future at levels that may pose a risk to human health or the environment may require additional investigative and/or corrective action. The soil cleanup levels established at this site are specific to this property and any plan to remove and/or dispose of the petroleum impacted soil off-site is subject to ADEC approval under 18 AAC 75.325(i). Furthermore, institutional controls may be attached to the property in accordance with 18 AAC 75.375 to identify the levels of soil contamination remaining on site.

If you have questions regarding this letter, please call me at (907) 269-7550 or send an email to me at Bob_Glascott@dec.state.ak.us.

Sincerely,

Robert A. Glascott
Contaminated Sites Program

Cc: Mr. Sig Jokiel, ChemTrack