

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

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File: 2320.26.014

December 29, 2004

Mr. Jack LaShot P.E.
Public Works Manager
City of Kenai
210 Fidalgo Street
Kenai, AK 99611

FILE COPY

Re: Kenai Airport (Former Kenai Aviation Services, Inc.)
ADEC Spill Number: #1997-23-00-251-01; UST Facility I.D. #0753
2004 UST Alternate Cleanup Levels Request – No Further Remedial Action Planned
Determination

Dear Mr. LaShot:

On March 19, 2004, the Kenai Area office of the Alaska Department of Environmental Conservation (ADEC) received a *2004 UST Alternate Cleanup Levels* (ACL) document, dated March 10, 2004. On November 15, 2004 we received a *2004 UST Annual Monitoring Well Sampling Report*. These documents were submitted by American Environmental on behalf of the City of Kenai for the above referenced facility. The City has requested ADEC consideration for the application of alternate cleanup levels for this site, as allowed under 18 AAC 78.620 (Groundwater and Surface Water Cleanup).

The 2004 monitor well sampling report provided the most recent analytical results for the five on site groundwater monitoring wells (KA-MW-1, KA-MW-2, KA-MW-3, KA-MW-4 and KA-MW-5). The groundwater sample data collected from these wells in comparison with historic groundwater data tends to demonstrate stable contaminant concentrations.

In addition to information presented in these reports, prior assessment reports and groundwater monitoring reports have been reviewed in order to make a determination regarding the environmental status of this property.

Based on the information reviewed, the following is a summary of the issues associated with petroleum hydrocarbon contamination at the subject property:

Soil

The 1999 Site Investigation report identified residual subsurface soil contamination at locations along the piping for the fueling ports and in soils around the excavation at the water table in the "smear zone"; which exceed ADEC soil "migration to groundwater" cleanup levels for diesel

range organics (DRO). To the extent possible, the cleanup efforts removed contaminated soil that was accessible by excavation in the area of the former jet fuel tanks. Due to physical constraints in this area, complete removal of all contaminated soil was not possible. The fuel ports and piping run associated with this tank system were abandoned in place and no soil excavation activities occurred in these areas.

Groundwater

Groundwater at this site was encountered approximately 10 feet below ground surface (bgs) in the area of the former release. Diesel range organics (DRO) associated with operation activities for the former jet fueling system has been detected in the shallow groundwater at concentrations exceeding the 18 AAC 75.345 Table C groundwater cleanup levels.

In the most recent 2004 sampling for all on site monitoring wells, only KA-MW-3 exceeded the 18 AAC 75.345 Table C groundwater cleanup levels for DRO.

There are no ground water supply wells identified within ½ mile of this site. The area surrounding the site is served by a network of city water mains. The City of Kenai draws its water from three municipal wells located approximately 3 miles from the airport site.

Soil and Groundwater Cleanup Levels

ADEC reviewed the various soil contaminant pathways that might be present at this site. They include: migration to groundwater; ingestion; and inhalation. ADEC recognizes that the migration to groundwater pathway is complete. Therefore, the soil cleanup levels applicable for this site are the 18 AAC 75.341 Method 2 soil cleanup levels for migration to groundwater.

The areas of ground water that exceed cleanup levels will be monitored until such time that contaminant levels can be demonstrated as consistently meeting the cleanup levels established in 18 AAC 75.345 Table C.

ADEC Decision

Based on the information provided in the two aforementioned reports, as well as all other reports and information provided to the ADEC for this facility, and contingent upon compliance with the conditions identified and listed below, no further remedial action is required in association with the former underground storage tank system at this Property (releases identified by ADEC Spill #1997-23-00-251-01), at this time. This decision is subject to any future ADEC determination that the cleanup is not protective of human health, safety, or welfare, or of the environment.

The Property, as used in the following Conditions, is hereby defined as:

NW ¼ SE ¼ Section 32, Township 6 North, Range 11 West, Seward Meridian, Kenai, Alaska at the Kenai Municipal Airport.

This decision is subject to the following Conditions:

1. The groundwater monitoring wells are identified in the 2004 Site Characterization report, and defined as KA-MW-1, KA-MW-2, KA-MW-3, KA-MW-4, and KA-MW-5. They are located as shown on Figure 2, Groundwater Elevation Contours, dated October 10,

2004. A copy of Figure 2 from the 2004 UST Annual Monitoring Well Sampling Report is attached. These wells shall be protected for future water quality sampling and monitoring purposes. Any damage to the wells shall be repaired and/or the wells replaced by the property owner.
2. The groundwater shall be monitored once every two years by sampling wells KA-MW-1, KA-MW-2, KA-MW-3 and KA-MW-5 between the months of July and September, in accordance with an ADEC approved work plan. The next sample event is required in 2006. The water samples shall be analyzed using method AK102. If the monitoring indicates that the concentration trend is increasing, ADEC may require additional follow-up monitoring and additional cleanup. If the monitoring indicates that the concentration trend is stable or decreasing, and that hazardous substance migration is not occurring, ADEC will decrease or discontinue the monitoring frequency and locations, if ADEC determines that continued monitoring is not necessary to ensure protection of human health, safety, and welfare, and of the environment.
 3. In July 2001, an additional 100 cubic yards of contaminated soil were excavated from the area of the former tanks. This soil was transported to the City's Maintenance shop and stockpiled for storage. The storage time for stockpiling this contaminated soil has now been exceeded. As such, in accordance with 18 AAC 78.274 (Storage, movement, and disposal of soil and groundwater) you are required to submit a disposal plan for the treatment and ultimate disposal of these soils.

As the property owner of this facility, under Alaska Statute, the City of Kenai remains liable for any residual soil and groundwater contamination at this facility. The conditions attached to this No Further Remedial Action Required determination remain in effect until ADEC issues a written determination that the conditions are no longer necessary to ensure protection of human health, safety, and welfare, and of the environment. If these conditions are not complied with, then this determination is nullified, and additional cleanup response actions may be required at your facility.

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.

For future reference, all records for this facility have been routed for filing in the Kenai Area Office under the file name, "*Kenai Aviation Services – City of Kenai, ADEC Spill #1997-23-00-251-01, ADEC UST Facility ID #753*".

Thank you for your cooperation in complying with the ADEC's Underground Storage Tanks release investigation and corrective action regulations, and Oil and Other Hazardous Substances Pollution Control regulations.

If you have any questions regarding this correspondence, or any aspect of this project, you may contact me at 262-5210 extension 229.

Sincerely,

A handwritten signature in cursive script, appearing to read "Monica English". The signature is written in black ink and is positioned above the typed name.

Monica English
Environmental Specialist

Attachment: Figure 2, Groundwater Elevation Contours

C: Peter C. Campbell, American Environmental