

STATE OF ALASKA

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

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File No. 1510.38.007

November 30, 2005

Dennis Huse, President
Alaska Pulp Corporation
1301 Fifth Avenue, Suite 3008
Seattle, WA 98101-2662

Re: No Further Remedial Action Determination
Eight Fathom Bight LTF
Database ID Number 2002110927804

The Alaska Department of Environmental Conservation (ADEC) has reviewed the findings presented in the September 2005 (revised October 21, 2005) final cleanup report for the referenced site. This letter presents ADEC's decision regarding site closure under 18 AAC 75.380.

This letter contains minor corrections and supersedes the department's letter dated November 18, 2005.

Background

The former Eight Fathom Bight log transfer facility (LTF) is located along the north shore of Port Fredrick, about 15 miles southwest of Hoonah. Several logging operators used the LTF and its associated infrastructure on behalf of APC from the early 1970s until the early 1990s.

ADEC added the site to its contaminated sites database in early 2003 as a result of site assessment activities conducted by the Forest Service and APC. ADEC approved APC's cleanup plan in August 2003.

The Forest Service issued a Time Critical Removal Action Memorandum (TCRA) in August 2003 due to a threat of a release from lead acid batteries. The Forest Service assumed the role of lead oversight agency under its Comprehensive Environmental Response Compensation and Liability Act (CERCLA) authorities. ADEC retained its role as a support agency and continued to issue approvals under state regulations.

Cleanup Levels

On August 15, 2003 ADEC approved site-specific cleanup levels (method 3) under 18 AAC 75.340 as follows for petroleum contaminants of potential concern:

Contaminant	Cleanup Level (mg/kg)
Benzene	0.0239
Diesel Range Hydrocarbons	691
Residual Range Hydrocarbons	8,300

Excluding lead, default method 2 cleanup levels under 18 AAC 75.341, Tables B-1 and B-2 were required for any other soil contaminants of potential concern. Contaminated groundwater, if present, was required to meet 18 AAC 75.345, Table C levels. Contaminated surface water, if present, was required to meet surface water criteria under 18 AAC 70.

ADEC formalized a 1,000 mg/kg uplands lead cleanup level in February 25, 2004, correspondence addressed to APC and the Forest Service. This cleanup level applied to all APC camps and LTF sites impacted by lead.¹

Arsenic and chromium, both detected above soil cleanup levels, were determined to be attributable to naturally occurring background concentrations.

Cleanup and Waste Disposal Summary

Cleanup activities occurred in six mobilizations from late August 2003 through late August 2004. Approximately 3,000 cubic yards of petroleum-contaminated soil were excavated from four source areas. Cleanup criteria were met except for two sample locations at about 13' below the former generator site excavation floor.

An unlined bioremediation cell was constructed in May 2004 to treat the petroleum-contaminated soil that had been excavated the previous fall and stored in three lined stockpiles over the winter. The large cell was split into two cells on May 29 to allow for continued road access through the area. Treatment continued through August 2004 when sample results showed that cleanup levels had been met.

In late August 2004, a third biocell was constructed over the northeast portion of the main cell to treat 400 cubic yards of petroleum-contaminated soil that was taken from the extended generator site excavation. This material was confirmed to meet cleanup levels in October 2004.

On October 16, 2003 and August 27, 2004, waste materials were barged from the former Eight Fathom Bight LTF for off-site disposal. The waste materials, including batteries and battery fragments, used oil filters, probable asbestos-containing materials; supersacks of hazardous lead-contaminated soil, bulk non-hazardous lead-contaminated soil, and petroleum-contaminated scrap metal were shipped to appropriate out-of-state disposal facilities.

¹ The 1,000 mg/kg uplands lead cleanup level assumed the sites would not be used for residential occupancy.

Groundwater and Surface Water Monitoring

A small drainage coming from the toe of the fill embankment was located about 40' to the northeast of the debris pile excavation. Water samples collected in August and September 2003 met applicable water quality criteria.

Surface water samples collected 33' downstream of road # 8577 in May and June 2004 met applicable water quality criteria.

Four monitoring wells were installed within and down gradient of the former generator site excavation. Cleanup levels were met in samples collected from MW-4 in May 2004, and from MW-1, MW-2, and MW-4 in October 2004. Groundwater samples could not be obtained from MW-3 because of insufficient water.

All wells were decommissioned on July 27, 2005.

Residual Contamination Above Cleanup Levels

Contamination remains above the DRO cleanup level approximately 13' below ground surface at the former generator site. This was the practical excavation depth of the equipment used during the cleanup.

Cumulative Human Health Risk

For contamination that remains on-site above cleanup levels, a chemical that is detected at one-tenth or more of the Table B1 inhalation or ingestion values set out in 18 AAC 75.341(c), the Table B2 values set out in 18 AAC 75.341(d) or the Table C values set out in 18 AAC 75.345 must be included when calculating cumulative risk under 18 AAC 75.325(g). Lead and petroleum mixtures are not included in cumulative risk calculations.

Arsenic and total chromium were detected above the one-tenth screening level in soil but were determined to represent natural background conditions. No other contaminants were detected above the one-tenth threshold.

Based on this evaluation, ADEC has determined that no cumulative risk issues exist at the Eight Fathom Bight site.

Ecological Risks

Contaminant migration is not expected. Impacts to streams, wetlands or other sensitive environments from residual contaminants are unlikely.

Administrative Site Controls

Soil remains above the method 2 migration to groundwater DRO cleanup level of 230 mg/kg. The Forest Service, as the landowner, has agreed to manage residual contamination under the terms and conditions of ADEC's April 25, 2001 letter to the Forest Service. In this letter ADEC granted a waiver from the requirements of 18 AAC 75.325(i) and 18 AAC 75.370 (b), which require ADEC approval before transporting or disposing of contaminated soil or groundwater.

The Forest Supervisor issued an Administrative Site Controls Memorandum to the District Ranger on October 31, 2005. The Forest Service has noted the locations where petroleum-contaminated soil remains above method 2 cleanup levels. Administrative site control boundaries are notated by polygons in the Forest Service Geographic Information System. This information will be cross-referenced in ADEC's database.

The Forest Service has noted that occupancy and use of the site are not restricted by the administrative site controls. As a general protocol, the Forest Service strongly discourages the movement of soils from the camp site. Soils may be excavated within the mapped limits of the contamination at the site only with the active participation of a Forest Service On-Scene Coordinator or Environmental Engineer responsible for sampling, testing, and tracking movement and placement of the soils. Routine grading of the surface soils should also be implemented cautiously.

Determination

The investigation and cleanup of the Eight Fathom Bight LTF site has met all requirements specified in 18 AAC 75, Article 3 - Discharge, Reporting, Cleanup, and Disposal of Oil and Other Hazardous Substances. No further remedial action is required.

In accordance with 18 AAC 75.380(d)(1), additional investigation and cleanup may be required if new information is discovered which leads ADEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 - .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 of the decision date. 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 of the decision date. The right to appeal is waived if a hearing is not requested within 30 days.

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