



THE STATE
of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program
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6/14/2019

File: 2421.38.003

Sent via electronic mail only

Lower Kuskokwim School District
Attn: Dan Walker - Superintendent
PO Box 305
Bethel, AK 99559

Re: Institutional Controls (ICs) Verification for: **Chief Paul Memorial School - Kipnik site;**
GPS Coordinates: 59.936507, -164.038043

Dear Superintendent Walker:

The Contaminated Sites Program conducts periodic verification of closed sites where institutional controls (land use restrictions) are required under 18 AAC 75.375. We have identified Chief Paul Memorial School - Kipnik as a site with institutional controls.

The Lower Kuskokwim School District should be aware that there are ongoing obligations for this site.

In order to prevent people from being exposed to any remaining contamination on the property, **this letter is being sent as a reminder** of the conditions placed on the property as part of the 2014 Decision Document granted by the Alaska Department of Environmental Conservation (ADEC). At the time of closure, soil and groundwater contamination were documented as remaining on the property.

Background: In 2011, the ADEC was notified that the Lower Kuskokwim School District (LKSD) planned to expand and renovate the Chief Paul Memorial School in Kipnuk, Alaska. Project activities included removing several structures and above ground storage tanks (ASTs) within the proposed school footprint, demolishing the schools former tank farm, and adding a new school tank farm near the former village tank farm. Numerous small spills had occurred at the school from numerous ASTs; and as such, the LKSD was required to characterize the nature and extent of contamination at the school.

Concentrations of RRO and several polynuclear aromatic hydrocarbons (PAHs) were detected in soil above the Method Two ingestion and inhalation soil cleanup levels for the under 40-inch precipitation zone established in 18 AAC 75.341(c), Table B1, and 18 AAC 75.341 (d), Table B2.

Please be advised that the Chief Paul Memorial School - Kipnuk site is subject to the following standard and site-specific conditions and/or institutional controls:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, these management conditions may not be protective and ADEC may require additional remediation and revised conditions. Therefore the Lower Kuskokwim School District (LKSD) shall report to ADEC every 5 years to document land use, or report as soon as the LKSD becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.
2. Soil contamination remains within the footprint of the school. The school is designed to be built on pilings, elevated above the ground surface with a fence from ground surface to the base of the school which will control access beneath the building. These controls must be implemented and maintained. When the building or fence is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
3. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325. A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.
4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
5. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional characterization and treatment may be required to ensure the water is suitable for its intended use. *This is a standard condition.*

In addition to the conditions above, you are required to notify the ADEC if there are any changes in land use or ownership. Failure to maintain these requirements may result in re-opening the site by the Contaminated Sites Program, in which case, further remediation could be mandatory.

In accordance with 18 AAC 75.380(d)(2), ADEC may require additional site assessment, monitoring, remediation, and/or necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

If you seek to have the institutional controls removed from this site, you can choose at any time to voluntarily conduct additional assessment, monitoring or further cleanup to demonstrate that contamination at the site now meets the applicable cleanup levels under 18 AAC 75.

You may submit any needed documentation electronically. If your submittal is too large to email (i.e. exceeds 20 megabytes), you may submit it to me through the Alaska ZendTo "drop-off" option at <https://drop.state.ak.us/drop/>. The Division of SPAR/Contaminated Sites Program prefers and encourages electronic submittals.

June 14, 2019

This site information is a matter of public record and is available through ADEC's online database record at: <http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/25609>

The ADEC will issue a reminder letter such as this on a scheduled basis, every five years. If you have any questions regarding this site, please contact me at (907) 465-5390 or mossy.mead@alaska.gov and I will be glad to assist you.

Sincerely,

A handwritten signature in blue ink that reads "Mossy Mead". The signature is written in a cursive, flowing style.

Mossy Mead
Environmental Program Technician – IC Unit

Encl: 2014 Decision Document

Note: This letter is being transmitted to you in electronic format only. If you require a paper copy, let us know and we will be happy to provide one to you. In the interest of reducing file space, the Division of SPAR/Contaminated Sites Program has transitioned to electronic transmission of project correspondence.

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From: [Microsoft Outlook](#)
To: dan_walker@lksd.org
Subject: Relayed: Institutional Controls reminder letter for Chief Paul Memorial School - Kipnuk
Date: Friday, June 14, 2019 1:32:36 PM
Attachments: [Institutional Controls reminder letter for Chief Paul Memorial School - Kipnuk.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
dan_walker@lksd.org (dan_walker@lksd.org) <mailto:dan_walker@lksd.org>
Subject: Institutional Controls reminder letter for Chief Paul Memorial School - Kipnuk