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3/13/2013

1159-20

Alaska Department of Environmental Conservation  
555 Cordova Street  
Anchorage, Alaska 99501

**Attention: Mr. Grant Lidren**

Re: Selawik Old AVEC Tank Farm and Barge Landing Cleanup  
ADEC File #500.38.007, 500.57.001

Dear Mr. Lidren:

In December, 2011, Alaska Village Electric Cooperative (AVEC) received a Potentially Responsible Party (PRP) letter from the State of Alaska regarding the old AVEC fuel tank farm and barge site in Selawik, Alaska. In 2010, the Alaska Department of Environmental Conservation (ADEC) contracted Shannon and Wilson to perform a Brownsfield Assessment of several sites in Selawik. The sites included the old AVEC tank farm and the barge landing where several abandoned AVEC fuel tanks were stored. This letter documents the AVEC cleanup work that occurred in 2012 at these sites.

The Brownsfield Assessment found hydrocarbon contamination around the old AVEC tank farm and noted several potential public health and safety concerns on the site related to fuel spills or leaks, abandoned equipment, and derelict buildings. Soil samples on the site also indicated areas of significant hydrocarbon contamination within the soil with the potential for impact to the groundwater.

The Brownsfield Assessment contained recommendations regarding cleanup required prior to any future property use. Recommendations included the removal of the abandoned fuel storage tanks from the site, the draining of fluids from the generator units located in the building and their subsequent removal from the site, the demolition of the generator building, and the removal of all cribbing and support structures for both the generator building and the tanks. The cleanup of miscellaneous debris on the site including metal and wood scraps was also mentioned.

As the assessment of the site occurred during a time when the ground surface was partially frozen, a true characterization of the extent of hydrocarbon contamination was not possible. The assessment report recommended that a complete characterization of the site be made and contaminated soils be excavated and treated in accordance with applicable standards.

On April 25, 2012, AVEC personnel, Marvin Mahlum, and local laborers began site cleanup operations. The objective of the 2012 cleanup was to demolish all the structures on the old tank farm site and barge landing site and remove all debris. All non-hazardous solid waste from the demolition and cleanup was to be deposited in the Selawik landfill. Field notes and a short report were made by AVEC personnel on site. These notes are attached to this letter. A photo log of all cleanup activities is also attached.

AVEC personnel were on site from April 25, 2012 through June 4, 2012. The first task that AVEC accomplished was the draining of all fluids from the two generator units in the old generator building. These units were listed as #1 and #3. The generators were subsequently removed from the building through partially demolished walls. As the generators were unable to be disposed in the landfill, the completely drained units were placed on a newly constructed pad in the new AVEC power plant facility for long-term storage. AVEC burned all used oils on site. The glycol was recycled and stored at the new power house.

Following the removal of the generators, the generator building was demolished. All debris from the demolition including wood framing materials, metal siding and roofing materials, and the wood support structure were disposed in the Selawik landfill. The removal included the creosote-soaked timbers that were mentioned in the 2011 Brownfield Assessment report. No remnants of the generator building remained on site.

The old pad-mounted transformers (five units) that had been noted in the Brownfield Assessment report were also drained and removed. The transformer oil was burned and the housing units were discarded in the landfill. The 2011 Brownfield Assessment report quoted Mark Teitzel, AVEC VP and Manager, in stating that the transformer units in Selawik did not contain PCBs because the transformers were manufactured after 1979.

Eight vertical above-ground storage tanks (AST) were located at the old tank farm. Each storage tank sat on a creosote timber foundation. None of the eight tanks contained any fuel products and had previously been decommissioned. The demolition and disposal of the fuel tanks was conducted by Rural Alaska Fuel Services. Each of the tanks were cut apart into manageable pieces using a plasma torch. The scrap metal was disposed in the landfill. The timber support frames were disassembled and where necessary excavated from the ground. All timbers were disposed in the landfill. No remnants of the tanks or their support structures remained on site.

Around the year 2000, AVEC decommissioned several tanks and relocated them to the barge landing. These tanks were also mentioned in the 2011 Brownfield Assessment report under the Barge Landing section. During the cleanup process, AVEC also cut and disassembled the tanks and then disposed them in the landfill. AVEC no longer has any tanks at the barge landing site.

A storage CONEX was also located at the site of the old AVEC tank farm. AVEC relocated the CONEX to the new tank farm site and it was placed onto a newly constructed pad. The CONEX was refurbished for future storage use.

Following the major demolition and cleanup process at the old tank farm, AVEC personnel and laborers cleaned up the remainder of the site. Any non-hazardous solid waste including lumber, metal scrap, and other materials related to the operation and maintenance of a power generating facility were disposed in the Selawik landfill. Waste oils were burned on site.

The 2012 season cleanup operation cleared the surface infrastructure from the sites. The old tank farm and barge landing sites are now ready for soil characterization and removal. Per the recommendation of the 2011 Brownfield Assessment report, a complete site soil characterization is planned to occur during the summer of 2013. Prior to the commencement of field activities, a corrective action plan (CAP) will be prepared and submitted to the ADEC for approval. Additional soil and water samples will be collected and the extent of hydrocarbon and metals contamination in the soil and groundwater will be determined. The findings of this characterization will then be used to guide cleanup efforts for soil removal and treatment.

March 13, 2013

If you have any questions or comments, please contact me a (907) 522-4337 or EMundahl@tpeci.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik D. Mundahl', written in a cursive style.

Erik D. Mundahl  
Environmental Engineer, EIT

CC: Mark Bryon, Operations Manager, AVEC

Encl.: 1) AVEC Cleanup Field Report and Notes  
2) Photolog of Cleanup Activities



Copy RD  
6-5-12

ALASKA VILLAGE ELECTRIC COOPERATIVE, INC.  
FIELD TRIP REPORT

Date \_\_\_\_\_  
Page 1 of \_\_\_\_\_

DO NOT WRITE IN THIS AREA

Date: \_\_\_\_\_  
TR#: \_\_\_\_\_  
Emp#: \_\_\_\_\_

NAME: MARVIN MAHLUM DEPT: Const.

\*\*\*\*\*DEPARTURE\*\*\*\*\*

\*\*\*\*\*ARRIVAL\*\*\*\*\*

LOCATION	DATE	TIME	LOCATION	DATE	TIME
Anchorage	4-17-12	11:00	Breug Missis	4-17-12	4 PM
Breug	4-25-12	8:40	Kotz	4-25-12	9:30
Kotz	4-25-12	3:00	Selawik	4-25-12	3:30
Selawik	6-4-12	10:00	Kotz	6-4-12	10:30
Kotz	6-4-12	2:15	Anchorage	6-4-12	4:15

Did any fuel spills occur? No  
Did any accidents occur? No

DAILY REPORT: (Please be as specific and brief as possible) Please include transformers, serial #, poles, pole #, investigation, equipment rental, equipment failures, fuel leaks, and fuel deliveries.

\*\*NOTE\*\* Attach all receipts to expense statement and have signed by a manager.

4-25-12 036-003 -366004

Travel to Seliwik - depart Breinig at 8:40 arrived Kotz at 9:30, depart Kotz at 3:00 arrive Seliwik at 3:30. Unpack tools and gear.

4-26-12 0360004

Worked with Brent and labors and layed out 12x12 timbers with cribbing to move units 1+3 at old plant.

4-27-12 0360004

Moved #1 out of plant about 36', Got unit 3 on pipes and ready to move in the morning. Had labores to dig snow to lay out more 12x12s to move units across board walk and arctic sewer pipe.

4-28-12 0360004

Move #3 out of butter building and move 36'. Start setting timbers to get them to board walk.

4-30-12 0360004

Move #1 across board walk and sewer pipe. H3d water plant extends boom help.

5-1-12 0360004

Move #3 across board walk and sewer pipe, stack 4x12x4' from tank farm and what we used for bridging to other side of sewer pipe.

5-2-12 0360005

Pulled and bagged all the insulation between floor joists. Moved 3 padmount trans. to plant



5-3-12 0360005

Took down all the decking that padmounts sat on. Tore down decking on back side of plant.

5-4-12 0360005

Loosened all the bolts to rad deck to take down. Moved snow at plant.

5-5-12 0360005

Take all plywood off roof, started taking down rafters. Got all of the diamond plate off floor. Started tearing down floor.

5-7-12 0360005

Take off rest of floor and got half of floors joists. Tore down walls and hauled to dump.

5-8-12 0360005

Took apart the three long support beams and legs (3x18x16' treated timbers) and moved to side. Take apart more of transformer back that melted out of snow.

5-9-12 0360006

Moved the storage conex and old ELQ off there platforms and across boardwalk and sewer line.

5-10-12 0360007

Start moving 4x12's and 12x12's back to new plant.

5-11-12 0360006 - 0360007

Move more timbers to plant and dig out more 4x12x4' from ground.

5-12-12 552

Clean in plant, move snow - stormed today



5-15-12 552 - 0360005

Had workers 4 hrs. everything froze back in.  
Start again tomorrow. Clean in plant.

5-16-12 0360005

Dig out timbers from old tank farm.

5-17-12 0360005

Dig out foundation from transformer deck and  
haul 4x12x4" back to plant.

5-18-12 ?

Dig out more timbers and blocking from  
old tank farm.

5-19-12 0360005

Use jack hammer and break out 4x12x12" from  
old plant foundation. Two timbers wide and two deep.

5-21-12 0360005

Jack hammer more blocks and haul to plant.  
Haul trash lumber to dump.

5-22-12 0360005

Haul more junk and trash to dump, clean up old plant.

5-23-12 0360005 - 552

Work at new plant moving material around. Drain  
4 padmount transformers and burn waste oil.

5-24-12 - 03200066

Burn waste oil, build pad and foundation  
for storage cones. ~~as~~

5-25-12 03200066

Burn waste oil, work on 1st cone foundation.

5-26-12 - 0360005 - 552

Burn Transformer oil, work on pad to set storage conex, and second pad for ELQ van.

5-28-12 0360005 - 552

Burn Transformer oil, clean up trash at old plant.

5-29-12 0320066 - 0320067

Move engines and conexs to plant. set the storage conex unto pad.

5-30-12 0320067 - 552

Finish pad for ELQ, pump water out of tank farm.

5-31-12 0320067

Used skid steer and moved ELQ onto its pad and leveled.

6-1-12 0320066 - 0320067

Used bolts and silicone to plug holes in walls of conexs for weather seal.

6-2-12 0320066 - 552

Finished holes, patched one hole in roof. Took pictures of old plant site and new plant. Clean up pack tools and gear to travel Monday morning.

6-4-12

Travel to Anc. Depart 10:00 am arrive Anc at 4:15, go to office





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1

**Selawik Old AVEC Tank Farm Cleanup: Photo Log – April-June, 2012**

Generator building during gen set removal.	Removal of generator units.
	
Generator units and old conex on old tank farm site.	Hauling the generator unit to the new tank farm pad.
	
Old generator units at the new tank farm.	Demolition of the old generator building.
	





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2

Continued demolition of the old generator building.



Structural demolition of foundation.



Clearing of the site and timbers.



Mostly cleared generator building site.



Cutting of fuel tanks on AVEC tank farm site.



Fully cut and removed fuel tank.







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3

Cutting of fuel tanks at the AVEC tank farm site.



Cutting of fuel tanks at the barge landing site.



All fuel tank scrap at the landfill.



All fuel tank scraps at the landfill.

