

October 22, 2019

Janine Boyette
Response & Remediation SME
Alyeska Pipeline Service Company
P.O. Box 196660
3700 Centerpoint Drive
Anchorage, AK 99519-6660

Re: OMS 135-2 Reconnaissance Report

Dear Ms. Boyette,

In April 2019, The Alaska Department of Environmental Conservation (ADEC) requested an environmental site reconnaissance at Operations Mining Site (OMS) 135-2. The site reconnaissance was performed to assess the site for indications of petroleum hydrocarbon contamination and the presence of subsurface magnetic anomalies indicating the presence of a purported buried tanker truck.

SITE LOCATION

OMS 135-2 is an approximately 30-acre site located within the floodplain of the Sagavanirktok River. This mining site was used by Alyeska and the Alaska Department of Transportation and Public Facilities (DOT&PF) during pipeline construction and subsequently for maintenance of the Dalton Highway. The site is near mile 403.5 of the Dalton Highway, approximately 12 miles from Prudhoe Bay. The site is on land managed by the Alaska Department of Natural Resources (ADNR), listed in the 2009 DOT&PF *Material Site Status, MS 65-9-027-2* report (Attachment 1) as an inactive-closed mining site (DOT&PF, 2009). The site coordinates listed in the ADEC Contaminated Sites Database are Latitude 70.061333, Longitude -148.572156 (ADEC, 2019).

SITE HISTORY

In the summer of 1993, an anonymous whistleblower complaint was received stating that a 40-foot tanker trailer was partially unburied during gravel removal at this site. The complaint stated that diesel fuel leaked from the tanker and was later buried. A stained area was reported on October 7, 1993 in a 100' by 100' area approximately in the middle of the mining area. Sampling conducted on October 10, 1993 indicated total petroleum hydrocarbon concentrations up to 2,250 milligrams per kilogram within the stained area. Communications between the Joint Pipeline Office, ADEC, and ADNR regarding the site between 1995 and 2008 do not indicate a resolution to questions regarding the source of petroleum hydrocarbon contamination or the presence of the alleged tanker truck (ADEC, 2019). The site status was listed as "closed-inactive" in 1982 as an apparent response to Alaska Department of Fish and Game objections over Sagavanirktok River channel diversions required for site access (DOT&PF, 2009).

ADEC visited the site in 2008 and 2014 but found no evidence of gravel mining or a truck rollover. In project notes for the latter visit (ADEC, 2019), ADEC personnel noted "a soil stain was observed most likely from a

historic leaking vehicle,” though it is not clear whether the statement references staining observed in 2014 or is a comment on the likely cause of staining observed during prior site visits. Photographs taken in 2014 by ADEC were not included with background files for the site (Attachment 2).

SLR observed the site from the nearest Dalton Highway access road in September 2017 and found the access road completely cut off from the mining area by a wide channel of the Sagavanirktok River, as shown on Figure 1. An on-site reconnaissance could not be performed at the time due to the lack of access from land.

2019 FIELD ACTIVITIES

The following field activities were conducted by two SLR field staff on August 12, 2019 in accordance with SLR’s ADEC-approved work plan (SLR, 2019) and ADEC’s *Field Sampling Guidance* (ADEC, 2017):

- Site inspection by helicopter, including aerial photographs;
- Ground inspection of the gravel bar for staining and debris;
- Survey of the gravel bar for magnetic anomalies using Schonstedt® model GA-52CS and Maggie magnetometers to assess the area for large ferrous anomalies; and
- Screening of the gravel bar for volatile hydrocarbons with a photoionization detector (PID) using the heated headspace method.

RECONNAISSANCE FINDINGS

Findings of the site reconnaissance are discussed in the following sections and are documented in the photograph log and field notebook included as Appendices 1 and 2, respectively.

- **Aerial Inspection:** The site was overflown by helicopter to inspect the exposed gravel bar for staining and potential debris that could be associated with a tanker truck. No staining or debris was observed. The extent of gravel bar above water and current river channel is shown in Photos 1 and 2 in Appendix 1.
- **Ground Inspection:** The gravel bar surface was inspected for staining and debris and the current gravel bar perimeter mapped using a handheld global positioning system unit (Figure 1). No debris or staining were observed and scouring and soil transport from high river water level were evident across the gravel bar. Typical gravel bar surface conditions are shown in Photos 3 and 4 in Appendix 1.
- **Magnetometer Survey:** The site was divided into north and south halves for screening with handheld magnetometers. No magnetic anomalies were located during coarse-screening in 20 foot (ft) rows along the south half of the gravel bar, located upriver of the ADEC site coordinate. A single, weak magnetic anomaly was detected during fine-screening on 5 ft rows along the north half of the gravel bar. The anomaly consisted of a weathered yellow pin flag, buried 6 inches deep, approximately 30 ft north-northeast of the ADEC site coordinate (Photos 5, 6, and 7, Appendix 1).
- **Soil Screening:** Soil screening samples were collected from 21 locations in the north half of the gravel bar, including a sample at the location of the historical pin flag. Samples were collected along evenly-

spaced transects to provide complete coverage of the northern extent of the gravel bar. PID screening results for all locations were at background levels of 0.0 to 0.1 parts per million.

CONCLUSIONS

The OMS 135-2 site reconnaissance did not find soil staining or magnetic anomalies which would indicate the presence of a buried tanker at the former material site in the vicinity of the ADEC site coordinate.

RECOMMENDATIONS

SLR recommends Alyeska request closure of this site pending future evidence of a petroleum release is observed at OMS 135-2.

Please contact us at your convenience should you have any questions.

Sincerely,

SLR International Corporation



Christophe Venot
Senior Scientist



Carl Benson
Principal Scientist

REFERENCES

ADEC, 2017. Field Sampling Guidance. August.

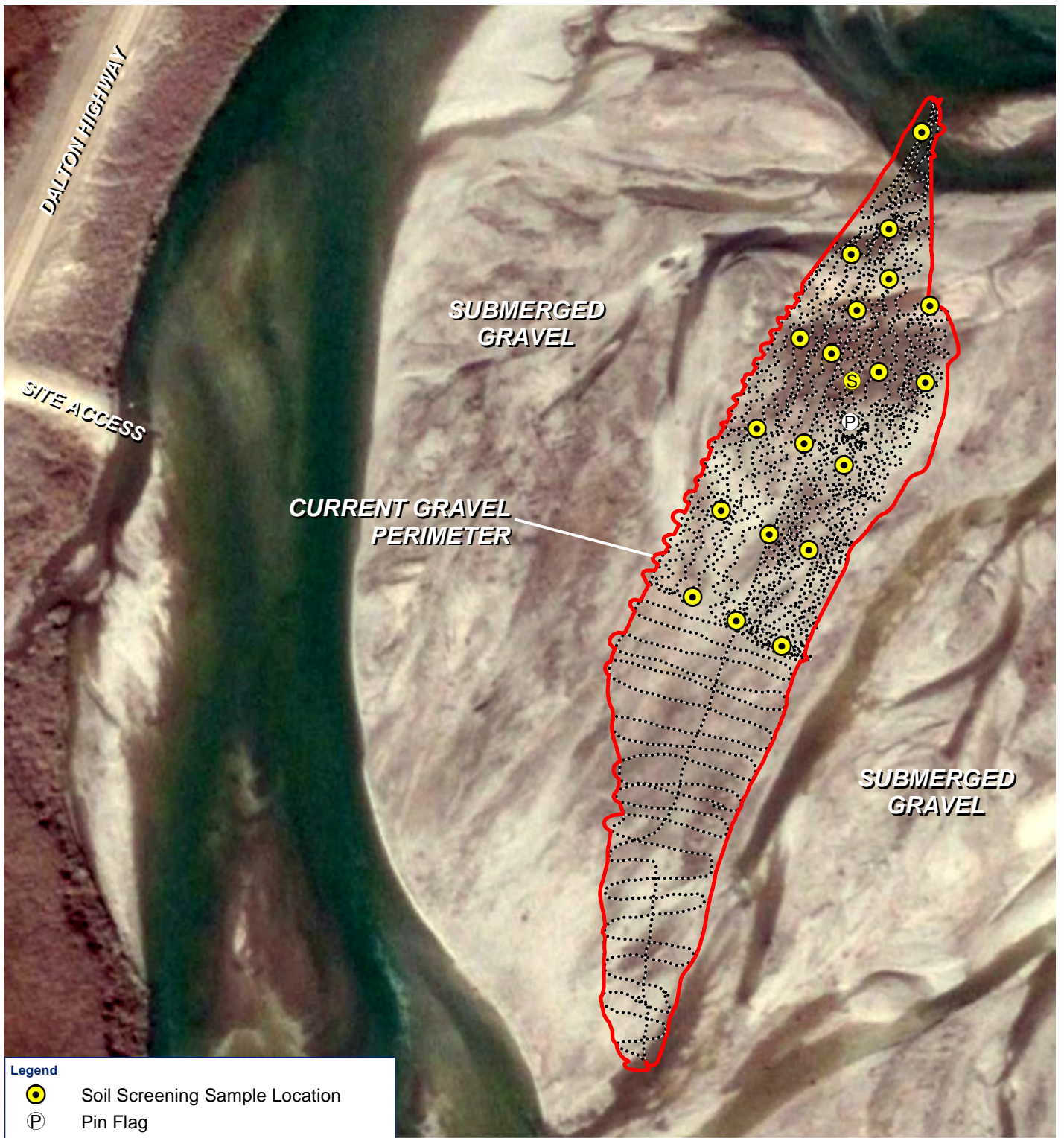
ADEC, 2019. Contaminated Sites Database,






<http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/1971>. Accessed October 08.

Alaska Department of Transportation and Public Facilities, 2009. Statewide Material Site Inventory, Material Site Status, Federal Project No. STP-000S(530), AKSAS Project No. 76174, Dalton Highway MS 65-9-027-2. September 24.

SLR International Corporation, 2019. OMS 135-2 Reconnaissance Work Plan. June 20.

- Enc Figure 1: Site Map and Screening Locations
 Appendix 1: Photograph Log
 Appendix 2: Field Notebook
 Attachment 1: Material Site Status ,MS 65-9-027-2
 Attachment 2: ADEC Site Correspondence



- Legend**
-  Soil Screening Sample Location
 -  Pin Flag
 -  ADEC Site Coordinate
 -  Current Gravel Perimeter
 -  Magnetometer Survey Coverage Area



THIS DRAWING IS FOR CONCEPTUAL PURPOSES ONLY.
ACTUAL LOCATIONS MAY VARY AND NOT ALL STRUCTURES ARE SHOWN.



Site
**ALYESKA PIPELINE SERVICE COMPANY
 OPERATIONS MINING SITE (OMS) 135-2
 DALTON HIGHWAY MILEPOST 403.5**

Report
OMS 135-2 RECONNAISSANCE REPORT

Drawing
SITE MAP AND SCREENING LOCATION

Drawing October 2019
 File Name F1 OMS135-2 RPT_19.mxd

Scale 1 Inch = 150 Feet
 Project No. 105.01288.19038

Fig. No. **1**



Photo 1: The OMS 135-2 Site (outlined in red in the photograph above) is located within the flood plain on the Sagavanirktok River. The North Slope haul road, including the site access point, is shown on the right in the photograph.



Photo 2: Alternate view of OMS 135-2 site. Dark patches of vegetation are visible within the site perimeter.


	<p>OMS 135-2 2019 Site Reconnaissance Report Deadhorse, Alaska</p>
<p>SITE PHOTOGRAPHS August 12, 2019</p>	<p>Job No: 105.01288.19038</p>



Photo 3: SLR staff conducting site screening for large magnetic anomalies on typical gravel bar ground surface using a magnetometer. Photograph faces north.



Photo 4: The pink pin flags represent screening sample locations. Photograph faces south.



SITE PHOTOGRAPHS
August 12, 2019

OMS 135-2
2019 Site Reconnaissance Report
Deadhorse, Alaska

Job No: 105.01288.19038



Photo 5: A yellow pin flag left during a prior site activity, found near the site coordinate provided by the Alaska Department of Environmental Conservation.



Photo 6: Aerial view of the yellow pin flag location (labeled “Previous pin flag location” in photograph above).



	<p>OMS 135-2 2019 Site Reconnaissance Report Deadhorse, Alaska</p>
<p>SITE PHOTOGRAPHS August 12, 2019</p>	<p>Job No: 105.01288.19038</p>



Photo 7: Alternate view of site coordinate and location of a historical pin flag found during the site survey.



Photo 8: A typical soil screening location showing a screening sample depth of 6-12 inches.

	<p>OMS 135-2 2019 Site Reconnaissance Report Deadhorse, Alaska</p>
<p>SITE PHOTOGRAPHS August 12, 2019</p>	<p>Job No: 105.01288.19038</p>

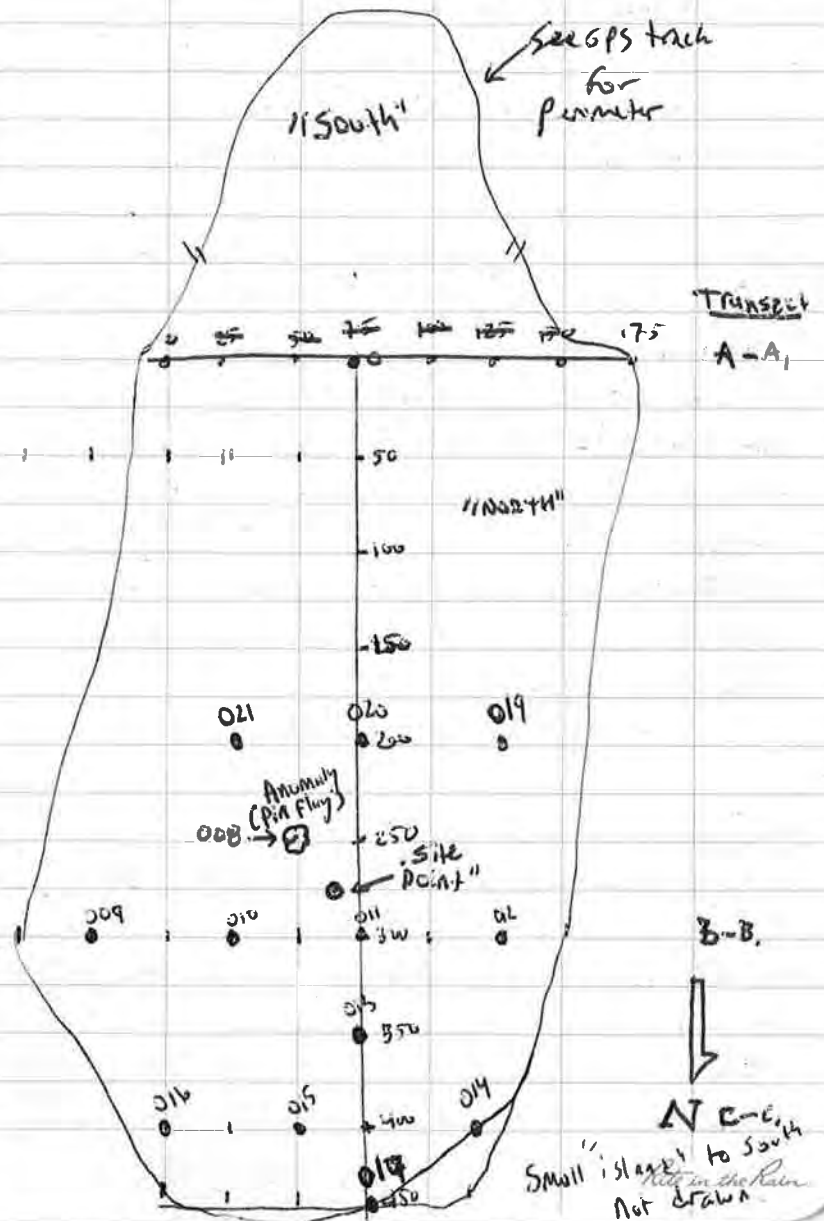
CUENT, E. TYLER 105,01288.1903E
1130 - Depart PSDI for OMS 135-2
1200 - Arrive at OMS-135-2. Tailgate

Safety Meeting

1205 - Helicopter (Maritime) arrives
1205-1230 - " Safety briefing
1230-1240 - Fly over site, take photographs
1240-1300 - lay out transects for screening w/
Magnetometers. See next page for sketch.
1300-1424 - Walk & screen S. North half of
gravel bar (nearest to GPS point for site)
1410 - locate Magnetic anomaly in ~4ft
diameter area.
1435 - Dig up yellow pin fly in magnetic anomaly.
Take GPS coordinate "008". Point is
approx 30 ft N-NE of GPS Course
N 70.00133, W 148.57216

1445-1530 - Collect screening samples for heated
headspace from north of "Anomaly" location 008:

008 = 0.0 ppm	015 = 0.0 ppm	018 = 0.0 ppm
009 = 0.0 ppm	016 = 0.1 ppm	
010 = 0.0 ppm	017 = 0.0 ppm	
011 = 0.0 ppm	and to north of point	
012 = 0.1 ppm	019 = 0.0 ppm	023 = 0.1 ppm 027 = 0.0 ppm
013 = 0.1 ppm	020 = 0.0 ppm	024 = 0.0 ppm 028 = 0.0 ppm
014 = 0.1 ppm	021 = 0.0 ppm	025 = 0.0 ppm
	022 = 0.0 ppm	026 = 0.0 ppm



C. UFAST, E. TYLER

8/12/19

- 1550-1610- Walk north end of gravel bar w/ Magnetometer, 1 person "Coarse" Screening based on position ^{with} upstream of site coordinate.
- 1610-1620 - Wrapup work, list off & take photographs of "Point" location where p.i. flag was found. Left orange flag in place.
- 1700- Return to PSOL.

Summary:

- "Fine" ^{North} Magnetometer Screening to ^{South} of transect A-A, using 2 Magnetometers and ~12.5 ft zig-zag North-South.
- Coarse Magnetometer Screening to South of A-A transect where probability of Magnetic anomalies is low due to large distance from site point coordinate.
- Schwartzest Models Used include:
- PID Screening soil samples collected from 6-12" using a pickaxe; locations adjusted slightly to avoid saturated sediments.
- No surface impacts (sheen or staining) were ~~it~~ observed.
- Gravel bar surface shows evidence of flooding at prior date (channels, deposits, etc)

UFAST 8/12/19

STATEWIDE MATERIAL SITE INVENTORY

MATERIAL SITE STATUS

**Federal Project No. STP-000S(530)
AKSAS Project No. 76174**

DALTON HIGHWAY

MS 65-9-027-2

September 24, 2009

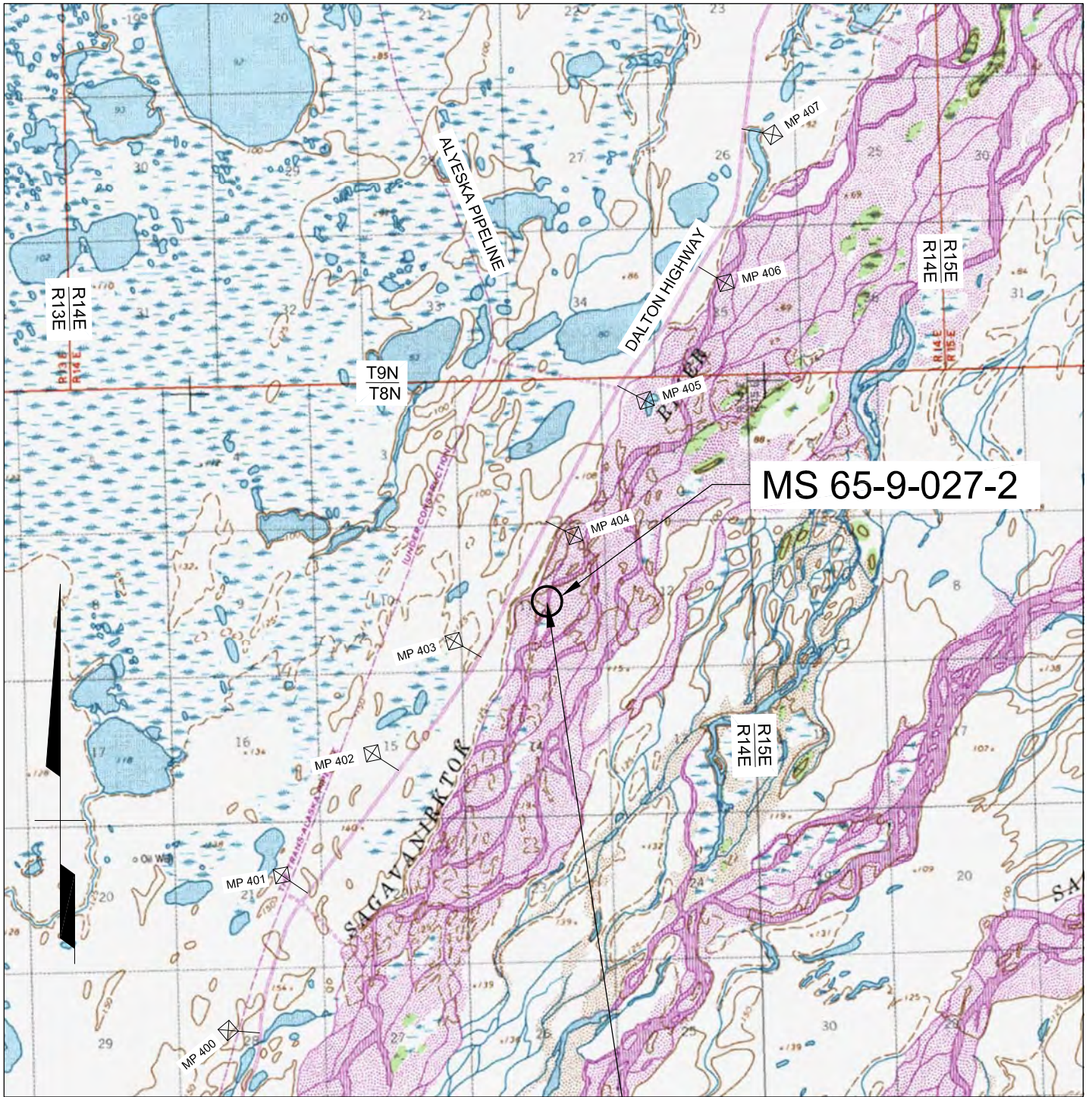
<u>CONTENTS</u>	<u>PAGE</u>
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LOCATION MAP	2

CATEGORY:

INACTIVE – CLOSED

According to information found in the DOT&PF EDMS system in January 2009 and DNR case file abstracts; this site was situated on State of Alaska lands managed by DNR. The site was used to construct the Dalton Highway and the Alyeska oil pipeline (MS 135-2). The materials consisted of sand and gravel in the floodplain of the Sagavanirktok River. A major channel of the river, approximately 150 yards wide, separated the access road terminus from the permit area. Diversion of the channel was unacceptable to ADF&G since the diversion would have to occur several miles upstream and would reportedly involve a major loss of fish habitat. The site was applied for in 1980 (ADL 403086) and a FUP was issued. The site was closed in 1982 apparently due to ADF&G objections.

LOCATION MAP



MS 65-9-027-2

U.S.G.S. QUADRANGLE: BEECHEY POINT (A-3)

GPS COORDINATES FROM GOOGLE EARTH
 UTM (WGS84-METERS)
 ZONE 6: N7,773,496 E440,191
 AK STATE PLANE (NAD83-US SURVEY FT)
 ZONE 4: N5,873,930 E1,818,809

INACTIVE - CLOSED



GRAPHIC SCALE IN MILES

STATE OF ALASKA DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES			
STATEWIDE MATERIAL SITE INVENTORY			
MS 65-9-027-2			
SCALE AS SHOWN	DESIGNED P.K.H.	DRAWN A.T.B.	PAGE 2
	CHECKED C.H.R.	DATE MAY 2009	

Lidren, Grant M (DEC)

From: Lidren, Grant M (DEC)
Sent: Monday, September 29, 2014 3:55 PM
To: Burns, Patty A (DNR)
Subject: RE: Haz ID 1971

Patty, per our phone conversation today, further assessment of this site is warranted. Proposed further characterization work includes: verifying the absence/presence of the alleged buried 40 foot tanker car and characterizing the extent of petroleum contaminated soil to the best extent practicable. This may be difficult because the location of contamination is unknown, which is located in the Sag River flood plain. However, ADEC can provide oversight to the DNR, should DNR want to move forward to further characterize the site in efforts to get this site to closure.

Feel free to contact me to discuss further.

Thanks, Grant

Grant Lidren
Environmental Program Specialist
Alaska Department of Environmental Conservation
Contaminated Sites Program
(907) 269-8685

From: Burns, Patty A (DNR)
Sent: Monday, September 29, 2014 2:08 PM
To: Lidren, Grant M (DEC)
Subject: Haz ID 1971

Hello Grant,
Good to speak with you.
DNR has serialized the site as ADL420325.
Patty

Patty Burns
Conveyances, Material Sales & Hazmat
State of Alaska, Department of Natural Resources
Division of Mining, Land & Water
Northern Region Office
(907) 451-3014

Lidren, Grant M (DEC)

From: Lidren, Grant M (DEC)
Sent: Monday, August 18, 2014 9:52 AM
To: Jensen, Melissa L (DOT)
Subject: RE: POA-2013-665 (UNCLASSIFIED)

Missy, since work will be specific to the road itself, it does not appear DOT will encounter contaminated soil. This is based off the limited data in our files. However if gross contaminated soil is encountered during the project(i.e. visible fuel, strong odor, or stained soil) DOT must contact the ADEC.

Thanks, Grant

-----Original Message-----

From: Jensen, Melissa L (DOT)
Sent: Monday, August 18, 2014 9:37 AM
To: Lidren, Grant M (DEC)
Subject: RE: POA-2013-665 (UNCLASSIFIED)

For the area around MP 403 work will be specific to the road itself. There is a Material Site at MP 403.7 that we proposed, but will be on the other side of the road from the Sag River.

-----Original Message-----

From: Lidren, Grant M (DEC)
Sent: Monday, August 18, 2014 9:00 AM
To: Jensen, Melissa L (DOT); Dewandel, Shannon S (DEC)
Subject: RE: POA-2013-665 (UNCLASSIFIED)

Missy, will the work be specific to the Dalton Highway itself or are there plans to excavate near the Sag River? Could River gravel be excavated at MP 403?

Thanks, Grant

Grant Lidren
Environmental Program Specialist
Alaska Department of Environmental Conservation Contaminated Sites Program
(907) 269-8685

-----Original Message-----

From: Jensen, Melissa L (DOT)
Sent: Monday, August 18, 2014 8:16 AM
To: Dewandel, Shannon S (DEC)
Cc: Lidren, Grant M (DEC)
Subject: RE: POA-2013-665 (UNCLASSIFIED)

Ok, thanks Shannon!

Grant, is there anything specific I need to do regarding this spill site?

Missy

-----Original Message-----

From: Dewandel, Shannon S (DEC)
Sent: Monday, August 18, 2014 8:13 AM
To: Jensen, Melissa L (DOT)
Cc: Lidren, Grant M (DEC)
Subject: RE: POA-2013-665 (UNCLASSIFIED)

Hi Melissa,

I spoke with the contaminated sites contact (Grant Lidren) regarding this site when I first saw the public notice. It was evidently a historic tanker truck roll over (in the 70's maybe) and was found partly buried. I believe that the spill was covered with soil and now we don't know where exactly it is, other than at ~MP 403. Most recently, a site visit was conducted by Grant Lidren but unfortunately he was unable to find it. I have included his email in the cc. Any further communication for the area should include Grant. I don't work contaminated sites, so if there is anything specific to the contamination found please contact him. You could also contact him prior to new dirt work in the area in case he has some specific suggestions.

Thanks,
Shannon

Shannon DeWandel
Env. Program Specialist III
DEC Div. of Water/Wetlands 404
Phone: 269-0103
Email: Shannon.dewandel@alaska.gov

-----Original Message-----

From: Jensen, Melissa L (DOT)
Sent: Thursday, August 14, 2014 8:59 AM
To: Dewandel, Shannon S (DEC)
Subject: RE: POA-2013-665 (UNCLASSIFIED)

Shannon,

Hi, I am the environmental impact analyst on this project. Is there anything that we need to do in response to this contaminated site? Please let me know if you have any questions.

Thanks
Melissa Jensen

-----Original Message-----

From: Lyons, Ellen H POA [mailto:Ellen.H.Lyons@usace.army.mil]
Sent: Monday, August 11, 2014 7:26 AM
To: Nelson, Brett D (DOT); Jensen, Melissa L (DOT)
Subject: FW: POA-2013-665 (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Are you aware of this potential contaminated site?

Thanks,

Ellen Lyons
Project Manager
USACE Alaska District Regulatory Division Fairbanks Field Office
907.474.2166

-----Original Message-----

From: Dewandel, Shannon S (DEC) [mailto:shannon.dewandel@alaska.gov]
Sent: Friday, August 08, 2014 2:31 PM
To: Lyons, Ellen H POA
Cc: Lidren, Grant M (DEC)
Subject: [EXTERNAL] RE: POA-2013-665 (UNCLASSIFIED)

Hi Ellen,

I have spoken with the contaminated sites person in charge of this site (Grant Lidren) and believe the project may not be impacted. There was an historical "alleged" spill where they evidently buried the tanker that had crashed at MP 403. If you need additional information Grant's number is 907 269-8685. I was checking as we are slated to determine if appropriate for issuing a 401 Certificate for the road improvement project.

Thanks,
Shannon

-----Original Message-----

From: Lyons, Ellen H POA [mailto:Ellen.H.Lyons@usace.army.mil]
Sent: Friday, August 08, 2014 9:31 AM
To: Dewandel, Shannon S (DEC)
Subject: FW: POA-2013-665 (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Hi Shannon, I am the project manager handling this permit application. I have no information regarding a contaminated site. What type of information do you need from me?

Thanks,

Ellen Lyons
Project Manager
USACE Alaska District Regulatory Division Fairbanks Field Office
907.474.2166

-----Original Message-----

From: Soiseth, Benjamin N POA
Sent: Friday, August 08, 2014 9:23 AM
To: Lyons, Ellen H POA
Subject: FW: POA-2013-665 (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

-----Original Message-----

From: Dewandel, Shannon S (DEC) [mailto:shannon.dewandel@alaska.gov]

Sent: Wednesday, July 23, 2014 2:58 PM
To: Soiseth, Benjamin N POA
Subject: [EXTERNAL] POA-2013-665

Hi Ben,

I am the new DEC 401 Cert person and have been looking at the PN referenced above, Dalton Highway improvements along the Sagavanirktok River. I double checked the location against our contaminated sites database and found one located at ~MP 403. I didn't see any information specific to that issue in the PN and wondered if there was any reference in the ADOT&PF application. Do you have any additional information on this issue?

Thanks,

Shannon

Shannon DeWandel

Env. Program Specialist III

DEC Div. of Water/Stormwater and Wetlands

Phone: 269-0103

Email: Shannon.dewandel@alaska.gov

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

Mcloone, Keather A (DEC)

From: O'Connell, William A (DEC)
Sent: Thursday, June 12, 2008 9:03 AM
To: Mcloone, Keather A (DEC)
Subject: Trip Report Alyeska OMS 135-2
Attachments: OMS 135-2 Dalton Hwy to River.jpg; OMS 135-2 north.jpg; OMS 135-2 dead end.jpg; OMS 135-2 south.jpg; OMS 135-2 1.jpg; OMS 135-2 2.jpg

Hi Keather,

I stopped by the site yesterday afternoon and took the attached photos. The site does not appear to be a gravel pit or to have been used as a gravel pit in the recent past. After turning east off the Dalton Highway, there is a road approximately 100 yards long that dead ends into the Sag River, which was running rather high at the time. If this area was used as a gravel source, the gravel mining most likely took place in the riverbed in winter, in which case the site would have been re-worked by the Sag River every year since then. There was no indication of contamination and no sheen on the river. If we could get confirmation of the location from Alyeska it might help, but from what I could see, there's nothing to see.

Bill

Bill O'Connell
Environmental Program Specialist
ADEC Contaminated Sites Program
(907) 269-3057

site visit result is inclusive as
there appears to be some
question as to whether or not
this was the correct location
photos saved to network

Mcloone, Keather A (DEC)

From: Mcloone, Keather A (DEC)
Sent: Wednesday, April 09, 2008 10:14 AM
To: Lynch, Leon C (DNR)
Cc: Schultz, Gary (DNR); Byrne, Laurence C (DNR)
Subject: RE: OMS 135-2
Attachments: Di4700305301309.PDF

That would be great. I have attached an image from GoogleEarth and one from TopoZone of where we think it is. I have been talking with Alyeska about visiting some of their northern Pipeline Corridor sites this summer and will let you know when myself or Bill O'Connell schedule that or any other trips north.

Thank you very much.

Keather McLoone
ADEC Contaminated Sites Program
269-7526

From: Lynch, Leon C (DNR)
Sent: Wednesday, April 09, 2008 9:37 AM
To: Mcloone, Keather A (DEC)
Cc: Schultz, Gary (DNR); Byrne, Laurence C (DNR)
Subject: RE: OMS 135-2

Hi Keather,

I just spoke with Gary and we are clueless. It's hard to even picture where this could be. Certainly no active pits in this area but we do recall a wide spot in road. How about we wait till summer and inspect either for ADEC or jointly? I will be up next week and will try to find the location. I could also go out there with Cathy Girrard if she is on slope. My phone # is 451-2724.

From: Mcloone, Keather A (DEC)
Sent: Wednesday, April 09, 2008 7:58 AM
To: Lynch, Leon C (DNR)
Subject: FW: OMS 135-2

Leon,

I thought I would check with you on this as I have heard back from Gary yet. Do you know if the whistleblower report of a buried truck at OMS 135-2 was ever confirmed?

Thanks much in advance.

Keather McLoone
ADEC Contaminated Sites Program
269-7526

From: Mcloone, Keather A (DEC)
Sent: Thursday, April 03, 2008 9:40 AM
To: Schultz, Gary (DNR)
Subject: OMS 135-2

Gary,

4/9/2008

Linda N suggested that I contact you after I reviewed information regarding what is currently listed as Alyeska OMS 135-2.

Here is the link to the current information we have. http://www.dec.state.ak.us/spar/csp/search/csites_report.asp?Hazard_ID=1971

Do you know if the presence or absence of a buried truck was ever confirmed? Or do you have any more up to date information about this site?

Thanks much!

Keather McLoone
ADEC Contaminated Sites Program
269-7526

Williams, Deborah

From: Barnett, Lori
Sent: Thursday, November 29, 2001 9:05 AM
To: Williams, Deborah
Subject: RE: Question on Cost Recovery for OMS 135-2

I show this was for \$2,226.05 billed in FY01 and paid by Alyeska - thanks for checking. Hope all is well with you!

Lori

-----Original Message-----

From: Williams, Deborah
Sent: Thursday, November 29, 2001 9:02 AM
To: Barnett, Lori
Subject: RE: Question on Cost Recovery for OMS 135-2

The site name is OMS 135-2 and it is an Alyeska site (LC is 14904060). The last DEC staff that charged to this site was Scott Rose in 1995. Hope this helps.

Deb/

-----Original Message-----

From: Barnett, Lori
Sent: Thursday, November 29, 2001 8:57 AM
To: Williams, Deborah
Subject: RE: Question on Cost Recovery for OMS 135-2

Hi Deborah - What is the site name or LC for this - I'm having troubles finding this bill number.

-----Original Message-----

From: Williams, Deborah
Sent: Thursday, November 29, 2001 8:54 AM
To: Barnett, Lori
Subject: Question on Cost Recovery for OMS 135-2

Hi Lori -

I just received an old file which had a cost recovery package in it and I was wondering if it ever got sent out for cost recovery. I would be happy to send you a memo with the packet if it has not gone out, but I have no way of verifying the hours that were charged to the site. The Bill Number is 994085. Let me know.

Deb.

Deborah Williams

Contaminated Sites Remediation Program
Alaska Department of Environmental Conservation
610 University Avenue
Fairbanks, AK 99709-3643
Phone: 451-5174
Fax: 451-5105
e-mail: deborah_williams@envircon.state.ak.us

MEMORANDUM

State of Alaska

Department of Environmental Conservation
Office of the Commissioner

TO: Frank Rue, Commissioner
Dept. of Fish & Game

DATE: February 18, 1998

Joseph Perkins, Commissioner
Dept. of Transportation & Public Facilities

COMMISSIONER'S OFFICE
JUNEAU

FEB 24 1998

John Shively, Commissioner
Dept. of Natural Resources

FILE NAME: G:\SPAR\MCS\AGENCY\MOA\DEPARTMENT OF
NATURAL RESOURCES

Shirley Holloway, Commissioner
Dept. of Education

Margaret Pugh, Commissioner
Dept. of Corrections

TELEPHONE NO: 907 465-5065

Jerome B. Komisar, President
University of Alaska

Deborah B. Sedwick, Commissioner
Dept. of Commerce & Economic Development

FROM: Michele Brown
Commissioner



SUBJECT: Memorandum of Agreement
for Identification and
Cleanup of Contaminated
Real Property

The Memorandum of Agreement (MOA) for Identification and Cleanup of Contaminated Real Property owned or operated by the State of Alaska has been signed by all involved State Agency Commissioners. I am confident that the cooperative process this MOA sets in place will serve the public interests well and will help us ensure consistency in how high priority contaminated sites are handled in the state, regardless of site ownership. I appreciate your cooperation and look forward to working with you toward our common goal. We will make certain that there is a continuing and intensive effort to coordinate with your staff for those sites which fall under your agency's jurisdiction.

MEMORANDUM OF AGREEMENT

BETWEEN

THE ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AND

DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
DEPARTMENT OF NATURAL RESOURCES
DEPARTMENT OF FISH & GAME
DEPARTMENT OF CORRECTIONS
DEPARTMENT OF EDUCATION
UNIVERSITY OF ALASKA
DEPARTMENT OF COMMERCE & ECONOMIC DEVELOPMENT

The purpose of this memorandum of agreement (MOA) is to expedite the implementation of a cooperative program for identification and cleanup of contaminated real property owned or operated by the State of Alaska. This agreement will address State-owned properties where there is no third party involvement or the third party is unknown and the responsibility for cleanup falls to the State of Alaska. Ownership or operation of contaminated sites poses liabilities to the state and assignees. This agreement may be amended to add state agencies with responsibility for contaminated real property that has not yet been identified.

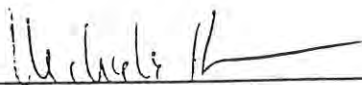
The Department of Environmental Conservation (DEC) is charged with the responsibility under Alaska Statutes (AS) 46.03, AS 46.04, and AS 46.09 and Title 18 of the Alaska Administrative Code Chapters 20 and 75 to conduct, oversee, and approve activities associated with pollution involving oil and other hazardous substances. Through this MOA, DEC seeks to efficiently carry out these authorities and regulations.

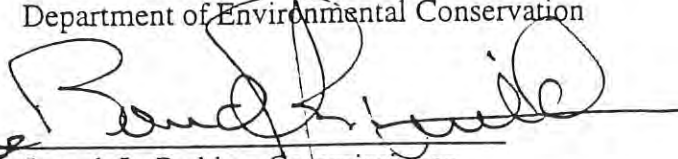
With the assistance of DEC, participating agencies will become familiar with the process for identifying "contaminated sites." All State-owned property meeting the identifying criteria will be reported to the DEC MOA Coordinator in DEC's Contaminated Sites Remediation Program.


The agency reporting the contamination will work closely with DEC during the initial phase of characterizing each contaminated site. This will include establishing the site's location, site conditions, events that led to the contamination, what hazardous materials are or may be causing the contamination, possible receptors, points of contact, and prioritizing further work at the site utilizing DEC's Hazards Ranking Model. High priority sites will be addressed first. Sites posing a lesser threat may be eligible to enter into DEC's Voluntary Cleanup Program.


It is expected that contaminated sites will continue to be discovered each year. Capital Improvement Project funding will be solicited by DEC from the Legislature each year to address selected sites. As site-specific funding is approved, DEC will take the lead for assessing and reducing the potential threat posed by those sites.

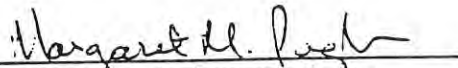
Concurrence:

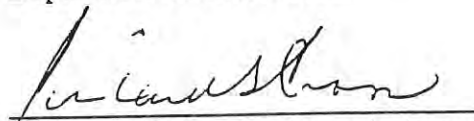

Michele Brown, Commissioner
Department of Environmental Conservation


for 
Joseph L. Perkins, Commissioner
Department of Transportation and Public Facilities

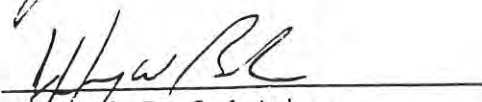

John T. Shively, Commissioner
Department of Natural Resources


Frank Rue, Commissioner
Department of Fish & Game


Margaret Pugh, Commissioner
Department of Corrections


Shirley J. Holloway, Commissioner
Department of Education


Jerome B. Komisar, President
University of Alaska

for 
Deborah B. Sedwick
Department of Commerce & Economic Development

MEMORANDUM

Department of Natural Resources

State of Alaska

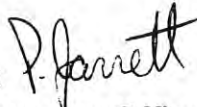
State Pipeline Coordinator's Office

TO: Anthony J. Braden
Chief Natural Resource Manager

DATE: February 11, 1998

FILE NO: OMS 135-2

TELEPHONE NO: 271-6109

FROM: Pat Jarrett 
Natural Resource Officer
Rights of Way & Permits

SUBJECT: OMS 135-2

You asked for a listing of the material sale contracts issued by DNR for material sites OMS 135-2 and OMS 135-3 as well as all correspondence we have in the files pertaining to contamination in OMS 135-2 and the possibility of a buried fuel tanker on the site.

Alyeska Pipeline Service Company and the Department of Transportation & Public Facilities are the only 2 entities to which material sale contracts have been issued for these sites. Following is a listing of case file numbers issued to each party.

Alyeska Pipeline Service Company

ADL	OMS	Date Issued	Expiration Date	Date Closed	Amount
64855	135-2 135-3	8-31-1974	8-29-1979	1-28-1985	unknown
65468	135-2	10-18-1974	10-18-1979	1-24-1985	unknown
66814	135-2 135-3	01-28-1975	02-03-1980	1-28-1985	unknown
414972	135-2	03-25-1993	03-25-1998		10,000 cy

I was not able to find the amount of material for the early contracts. That information is not on LAS nor was it on the microfiche cards I looked at in the records room of Realty Services in the Frontier Building.

Department of Transportation & Public Facilities

ADL	OMS	Date Issued	Expiration Date	Date Closed	Amount
63741	135-3	4-15-1974	11-01-1975	12-28-1981	286,000 cy
63472	135-2	4-15-1974	11-01-1975	12-28-1981	170,000 cy
73972	135-2	4-16-1975	12-31-1978	12-28-1981	unknown
403085	135-3	07-07-1981	02-01-1986	03-08-1982	none Site not suitable
403086	135-2	07-08-1981	03-08-1982	03-08-1982	none Site not suitable

I talked to Sue Slifer with DOT/PF in Fairbanks. She said the only information in their files dealing with contamination came from JPO. She said that Shari Howard made a note on the copy of the 8-28-1995 contaminated site report sent to her office that "Dwight has never been in pit. Only used during construction."

I have talked to Cathy Girard at Pump Station 01 about this several times. She was employed by DEC at the time the contamination was reported and she filled out the DEC Oil & Hazardous Material Incident Notification form. She reviewed her files at PS 01 for documentation of the contamination and found nothing.

She also contacted Jim Criner, Maintenance Coordinator at PS 05, who was the P&CM at PS 01 when the contamination was reported. He does not have any information with him. When Stan Bronczyk and I were at PS 05 in September, I asked Jim about OMS 135-2. He said that Alyeska never came up with solid stuff while pushing material. He never saw anything out there. Jim also said that he had heard this site was used as a solid waste disposal site during pipeline construction. He did not think Alyeska used it for that purpose.

Attached in chronological date order are copies of all correspondence dealing with the contamination of OMS 135-2.

MEMORANDUM

Department of Natural Resources

State of Alaska

State Pipeline Coordinator's Office

TO: David Dorris
Special Projects Coordinator

DATE: January 12, 1998

FILE NO: (51) 2.6.2, (51) 2.13,
PT 2

TELEPHONE NO: 271-4393

FROM: William G. Britt, Jr. *WGB*
State Pipeline Coordinator

SUBJECT: Alleged Contaminated Site OMS
135-2 (OL-41)

Recently you briefed me on the referenced subject. You informed me that in October 1993 Alyeska reported to ADEC "evidence of petroleum" within the referenced material site. This was also reported to a ADEC/SPCO representative on Oct. 9. Alyeska followed up with a written report on Oct. 10. ADEC sampled the site and found from 400 to 2250 parts per million hydrocarbons, which exceeds the minimum standard for clean up. The contamination was reported to BLM in April 1994 by a concerned Alyeska employee, but the report was not passed on to JPO's ECP until July 18, 1995. The report to BLM included an allegation that there is a buried tanker (semi-trailer) at the site. On July 28, 1994, JPO opened an Employee Concerns Program case file (OL-41) and, in August, asked DEC to reopen their investigation into the spill site and the alleged buried tanker.

Tony Braden then briefed me, indicating that site OMS 135-2 is owned by the State of Alaska, has had multiple users, and has had multiple managers issuing permits. The SPCO has an interest in the future availability of the site for gravel and is working with ADEC and ADNR's Northern District to determine the extent of surface and subsurface contamination of the site, including the possibility of buried materials.

For your purposes, you should know that the multiple users and jurisdictions, and the lack of clarity regarding funding, will likely preclude quick characterization and remediation of the site. Please feel free to contact Tony or me if you need further information.

Jarrett, Pat (ADNR)

From: "Girard, Catherine A."
To: Jarrett, Pat (ADNR)
Subject: RE: OMS 135-2
Date: Thursday, January 08, 1998 8:55AM

Pat: I'll call Jim Criner to see if he can point me to exactly where the reports might be. I checked the Maintenance Coordinator's and the Pump Station Assistant's files, both under "Spills" and "Material Sites" and couldn't find any information. Maybe Jim filed the information in an area I'm not aware of. I'll get back to you.

Cathy Girard
FBU Environment Generalist
> > check "FBU Enviro. (PS01-PS04)" calendar

> -----
> From:
> Pjarrett@pipeline.state.ak.us[SMTP:Pjarrett@pipeline.state.ak.us]
> Sent: Wednesday, January 07, 1998 11:08 PM
> To: GirardCA@alyeska-pipeline.com
> Subject: RE: OMS 135-2

>
> Cathy, Thanks for looking. I talked to Jim Criner at PS05 in
> September
> when Stan and I were looking at the material sites. Jim said the
> reports
> would still be in your files at PS01 so that is why I asked you to
> check.
> Thanks again and I look forward to hearing from you soon.

> Pat Jarrett
> -----
> From: "Girard, Catherine A."
> To: Jarrett, Pat (ADNR)
> Subject: RE: OMS 135-2
> Date: Thursday, January 08, 1998 7:47AM

> Pat: I've searched our Field Environment Generalist files and the
> PS01
> files re: the information you're seeking, and have come up empty
> handed.
> I'm heading to PS04 tomorrow, and we may have the information stored
> in
> our historical files there. I'll get back with you after I get done
> with looking.

> Cathy Girard
> FBU Environment Generalist
> > > check "FBU Enviro. (PS01-PS04)" calendar

> -----
> > From:
> > Pjarrett@pipeline.state.ak.us[SMTP:Pjarrett@pipeline.state.ak.us]
> > Sent: Tuesday, December 30, 1997 5:51 AM
> > To: GirardCA@alyeska-pipeline.com
> > Subject: OMS 135-2

> > Hi Cathy,
> >

> > Did you have a good holiday? I've tried to reach you by phone a
> > couple
> > times today but did not get you so thought this would be an option.
> >
> > I am inquiring about the Oil & Hazardous Materials Incident
> > Notification
> > that you filed on OMS 135-2 on 10-7-1993 (when you were wearing the
> > DEC
> > hat!). Do you have any record up there to indicate the location of
> > the
> > spill area? Like which section or even quarter section? Do you
> > have
> > maps
> > or drawings of the site with the spill area depicted?
> >
> > If so, could you send me a copy? My fax # is 272-0690.
> >
> > I'd like to talk to you about this site too. So if you could call
> > me
> > at
> > 271-6109 at your convenience I would appreciate it!
> >
> > Thanks,
> >
> > Pat Jarrett
> >
>


STATE OF ALASKA
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION & RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM

Telephone: (907)269-7658
Fax: (907)269-7649

November 18, 1997

TO: Pat Jarrett
JPO/ADNR

FROM: Jim Frechione 
Environmental Specialist

SUBJECT: OMS 135-2
Reckey # 93720128001

ADL 111437Z

A review of the ADEC file on the above referenced site, indicated the need for additional information in order to determine the nature and extent of the contamination. It is recommended that ADNR research their records to identify potentially responsible parties (PRP's) that might have used the site and caused any site contamination. If the site was under material sale contract to Alyeska Pipeline Service Co. and/or DOTPF -- they might be appropriate candidates to conduct a site assessment. Otherwise, the landowner may bear the burden of investigative costs and attempt to recover them from PRP's in the future.

Let me know if ADEC could assist you in pursuing this matter.

Department of Environmental Conservation Report

Contaminated Site Data and Actions For: 93720128001

Generic Name:	Material site	Company:	Alyeska	Elect. District:	File No: 330.38.029
Facility Name:	OMS 135-2	Lead RP:	Dept. of Transportation & Alyeska	Just :	
Facility Address:	mile 406 Dalton Highway	Mailing Address:	Joint use site	Prog : SO	Landowner: DNR
City/State/Zip:	Deadhorse AK 99734	City/State/Zip:	AK	Facility ID # :	
Telephone:		Telephone:		Staff:	Girard
		Ledger Code:	14904060	Ranking Score:	8.4
				Priority:	3
Latitude:				Status:	AC
Longitude:					
Legal:	section 1, T8N, R14E Umiat Meridian				

Problem: Diesel contaminated gravel found at the material site. Cathy Girard, ADEC, sampled the material site. Samples indicate a limited extent of DRO contamination ranging up to several thousand mg/kg DRO.

Comments: Alyeska whistleblower complaint stated that a buried 40 foot tanker trailer was partially unburied during gravel removal. Tanker was said to be damaged and started to leak diesel fuel. Site was covered up. This is a joint use pit, used by DOT and Alyeska and administered by DNR. Gravel pit is in the flood plain of the Sag River. No clear PRP has been identified. JPO requested DEC to demand action from the PRPs. Cross reference file#s 330.02.109

Actions:

Code	Description	Date	Action Staff	Status
RPL3	* RP Determined & Action	10/26/1995	Rose	DNR/Joint Pipeline Office contacted the dept. to determine hoe to prioritize this site. DNR is the landowner of this joint use pit utilized by ADOT and Alyeska. As a result of this request, a letter was sent to DNR requesting additional action at this site.
ADD	* Site added to database	11/21/1995	Rose	

END OF REPORT

Wolfe, John (ADNR)

From: Wolfe, John (ADNR)
To: Braden, Tony (ADNR)
Cc: Dorris, David (USBLM); Friedman, Bonnie (ADEC)
Subject: OMS 135-2 Contaminated Site
Date: Monday, August 19, 1996 10:34AM

Tony, as far as I know there is no report or specific information in our ADL 63574 case file on this matter. From prior inquiries I have been told Scott Rose of DEC has a file; however, I have never seen it. When I tried to track it down no one could produce it. The only assemblage of information on this subject that I have personally seen is in a restricted access file with access to it currently controlled by David Doris. I have no idea of what can be released from this file. From what I saw in it, I would have to believe DEC must have something in their files somewhere. The lack of public usable information on this matter seems to be part of the problem in making progress on addressing the contaminated site.

The report I saw states DEC determined the site was contaminated. If Alyeska needs info suggest they contact DEC or David Doris to determine if any information is available on the site. Sorry I can't be of more help.

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Remediation Program
Site Remediation Section
555 Cordova Street
Anchorage, Alaska 99501

PHONE: (907) 269-7659
FAX: (907) 269-7649

March 8, 1996

File: 330.38.029

Letter: 96SCR016

Jerry Brossia
State Pipeline Coordinator
Joint Pipeline Office
411 West 4th Avenue
Anchorage, AK 99501

RE: OMS 135-2

Dear Mr. Brossia:

The department sent you a letter on October 26, 1995 requesting DNR to submit a site assessment workplan for the OMS 135-2 contaminated site along the Trans-Alaska Pipeline Corridor (attachment 1). ADEC elevated the oversight priority of this site due to Joint Pipeline Office concerns over the extent of potential contamination at the material site and also due to a "whistle blower" complaint (attachment 2) received by the JPO. As of March 8, 1996, ADEC still has not received a copy of a workplan or any other correspondence from your staff.

Please submit a workplan to ADEC for review within 30 days. The department will need approximately 30 days to review the workplan. The department must approve the workplan prior to initiation of any field work. I would be glad to provide DNR with technical assistance. If you have any other questions or need additional assistance, please feel free to contact me at the above number.

Sincerely,



Scott C. Rose

attachments

cc w/out attachments:

Gary Reimer, BLM/JPO
Tom Chapple, ADEC
Ron Klein, ADEC
Paul Misterek, DOTPF/TAPS Coordinator

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Remediation Program
Site Remediation Section
555 Cordova Street
Anchorage, Alaska 99501

PHONE: (907) 269-7659
FAX: (907) 269-7649

October 26, 1995

File: 330.38.029
Letter: 95SCR075

Jerry Brossia
State Pipeline Coordinator
Joint Pipeline Office
411 West 4th Avenue
Anchorage, AK 99501

RE: OMS 135-2

Dear Mr. Brossia. *Jerry*

Tom Chapple forwarded me a copy of your August 28 memo concerning the operational material site OMS 135-2. Your letter states that the Joint Pipeline Office received a concerned employee complaint which identified the potential for a buried tank-trailer on site. The Department performed a site reconnaissance and collected several samples from this site to evaluate the presence of contamination. Preliminary data indicate that diesel range petroleum hydrocarbons are present on site at concentrations exceeding the DEC cleanup criteria.

Based on the information provided by JPO and our reconnaissance soil sampling, the department is requesting the Department of Natural Resources, and/or the site lessees, to conduct an environmental site assessment to determine the extent of petroleum hydrocarbon contamination at this site. The assessment should include a subsurface investigation to confirm the presence or absence of a buried tank-trailer. I have provided your office with a copy of our site files including all analytical data and sample location maps. Please submit a workplan to the department for review and approval prior to initiation of any site work.

The Department would be glad to provide DNR with technical assistance. If you have any other questions or need additional assistance, please feel free to contact me at the above number.

Sincerely,

Scott C. Rose
Scott C. Rose

cc: John Santora, BLM/JPO
Tom Chapple, ADEC
Ron Klein, ADEC
Paul Misterek, DOTPF/TAPS Coordinator
Jim Sweeney, Alyeska Pipeline Service Co.

Wolfe, John (ADNR)

From: Friedman, Bonnie (ADEC)
To: Sheldon, Carol (USBLM)
Cc: Rose, Scott; Friedman, Bonnie (ADEC); Wolfe, John (ADNR)
Subject: Other line Employee Concern-Diesel Fuel Leak at OMS 135-2
Date: Thursday, October 12, 1995 9:51AM

Carol, I spoke with Scott Rose this morning. Upon receiving John Wolfe's letter, he drafted a memo to his boss, stating that DNR requested action and asking for approval to request Alyeska to perform the assessment. (this is because diesel contamination levels found at the site would not normally trigger further investigation according to DEC's priority ranking model) Tom Chapple wrote a hand note to the manager of the Contaminated Sites Program asking her for consideration. Scott is trying to track the progress on this since he is not aware of any response.

Carol, I am concerned about the approach to solving this problem. Scott relayed that DEC wouldn't ask Alyeska alone to do the geophysical survey, they would have to ask all potentially responsible parties, DNR, DOT and Alyeska. If the issue is the buried tanker and the whistleblower complaint, rather than contamination, I suggest we explore taking another approach, the driving agency may not be DEC.

330.38.029

Alyeska pipeline

SERVICE COMPANY

1835 SOUTH BRAGAW STREET ANCHORAGE, ALASKA 99512 TELEPHONE (907) 278-1611, FAX 285-8811, TELEX 285-8439

July 5, 1994

Letter No. 94-6033
VIA FACSIMILE

Ms. Molly Birnbaum, Project Review Coordinator
Alaska Division of Governmental Coordination
State Pipeline Coordinator's Office
411 East Fourth Avenue, Suite 2C
Anchorage, Alaska 99501

*Hot off the press from
Molly. You can contact
her with concerns/comments*

RE: Trans-Alaska Pipeline System
Sagavanirktok River Dikes, Pipeline Milepost

22
25.5 (AK9406-030G)
62.5 (AK9406-020G)

Dear Ms. Birnbaum:

We are in receipt of your letter dated June 22, 1994 requesting additional information on the referenced project application package submitted on May 3, 1994. We understand that the public review for the PLMP 22 work began on July 1, 1994

In response, we offer the following:

1. **Material Sources:**

The material previously mined from **OMS 135-2 in 1993** was stockpiled on the TAPS rights-of-way in accordance with the permits pertinent to that pit; the stain area was staked and avoided. This material along with other material, either mined and stockpiled or still-to-be-mined, available at other, nearby, fully-permitted sites are the sources of fill for this project. Other than the sale application associated with the proposed pilot channel, no additional contracts have been requested to support this project. A sale application for contingency/long-term material at OMS 130-5 will be submitted in the near future.

*Pam -
this satisfies
my program.
See #*

Post-It™ brand fax transmittal memo 7671		# of pages > 5
To M. Birnbaum	From D. Prenderville	
Co.	Co.	
Dept.	Phone 291.2.8111	

M. Birnbaum
APSC Letter No. 94-6033
July 5, 1994
Page 2

2. Water Quality Monitoring Plan:

Enclosed is a water quality monitoring plan to be implemented at the PLMP 22 site only in the event that in-stream work is performed; it is conceivable that no such work will be required. Alyeska did not commit to such monitoring at the time of application because it is staff's opinion that any variances caused by in-stream work will be of a very short-term duration and nominal effect. No plans for the other two sites are submitted because no in-stream work will occur there.

3. Work Schedule Update:

Timing is dependent upon falling water levels, access, availability of permits, and funding approval. Duration is dependent upon crew size, availability of equipment, final scope of work and other construction delays.

M. P. 22 & 25.5

START: 8/15 to 9/1

DURATION: 5 TO 6 weeks

STOP: Completion of job or extreme cold weather which would effect personnel, equipment or compaction effort. Expect to be complete by 11/15/94 at latest.

M. P. 62.5

START: Access to this site requires crossing the active channel of the river which is typically passable in September. If conditions do not allow timely passage this year, a second mobilization to this site would be scheduled as soon as ice conditions allow (anytime between late October and early March).

DURATION: 4 weeks

STOP: Completion of work depending on start date.

4. Pilot Channel Justification:


The Spur Dikes are designed for the project design flood (PDF). The flood of August 1992 has become the design flood for these dikes. Water levels experienced during the flood are being incorporated for design per the Repair of River Training Structures Report that was completed last December. The return period of the flood was never determined by the USGS. This is a moot point since water levels are available for direct application.

M. Birnbaum
APSC Letter No. 94-6033
July 5, 1994
Page 3

The alternative of raising Spur #3 is not feasible since it is already at the elevation of the Dalton Highway. Raising the height of the spur above that elevation would put the highway in jeopardy during a flood event. The other alternative for protecting dike #3 during a flood event is the by-pass channel. The effectiveness of the by-pass channel is site specific and does not lend itself to displacement upstream or downstream. The downstream area will not offer any relief to the water surface elevations at dike #3. Up-stream areas where gravel bars exist, already overflow during flood events and do not provide the necessary relief. Dredging in existing channels will only provide areas for deposition during non-flood flows. The site for the by-pass channel was chosen explicitly because this is where the constriction of the channel contributes significantly to the water surface elevations on the upstream side of Spur #3.

This information is submitted now, without the benefit of a clarification meeting with the agency staff requesting the information, in order to meet the deadlines dictated in your letter. We are available, however, to meet at any time convenient with you to discuss this matter further.

Sincerely,



Dennis E. Prendeville
Lands and Permits Supervisor

cc: Jerry Brossia, ADNR/SPCO
Mary Weger, US Corps of Engineers

Water Quality Monitoring Plan
For the Construction Activities Near PLMP 22
Sag River Spur Dike Construction and Modifications

UPSTREAM (BACKGROUND) SAMPLING

- Background sampling for turbidity and settleable solids will be taken on the upstream side of spur dike #2.
- This sample location may vary due to flow conditions at the time of project startup.
- Background sample results will establish baseline monitoring information throughout the project. These samples will be taken prior to in-stream work and throughout the duration of the instream work on the project.
- Sampling times will correspond to sampling times for downstream samples. All upstream and downstream sampling events will be done within 1 hour of each other.

DOWNSTREAM SAMPLING

- Downstream samples will be taken at sample point #2 which is located near the nose of spur dike #4.
- This sampling point may vary depending on flow conditions at project startup. The final location of this sampling point will be chosen such that it is representative of short term water quality effects caused from this project.
- Sampling will be taken no less than once per day while the project is impacting water quality.
- Visual effects to water quality will be recorded in written logs.

Sampling will be conducted daily at sample points #1 and #2 while instream work is in progress. Daily sampling will be designed such that it indicates representative effects to water quality. Written logs will be kept on a more frequent basis to indicate when visible effects to water quality are observed. These logs will be updated twice daily while instream work is in progress. These logs will note if visible sediment loading to the stream is occurring.

Due to the different portions of this project sample point #2 may be relocated as work on the different spur dikes and

6/30/94

the channel is done. This will be done to measure maximum effects to water quality. Additionally an optional sample point #3 may be utilized to sample the point where sediment loading is visually observed to achieve complete mixing.

6/30/94

STATE OF ALASKA
DEPARTMENT OF ENVIRONMENTAL CONSERVATION



DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM
555 CORDOVA STREET
ANCHORAGE, AK 99501-2617

To	Helen / Lynn Kent	From	Scott ROSE
Company		Date	
Dept.		Phone No.	(907) 269-7500
Fax No.	465-5262	Fax No.	(907) 269-7649

Number of pages including cover sheet: 3

SUBJECT:	OMS 135-2
COMMENTS:	Lynn - I've been getting calls about this for several weeks. Have you had a chance to look over the memo? I can brief you on the situation at your convenience. Scott

MEMORANDUM

Department of Environmental Conservation

State of Alaska

State Pipeline Coordinator's Office


DATE: June 1, 1994

TO: Molly Birnbaum
Division of Governmental Coordination

FILE #: 910362

THRU:

PHONE #: ext. 281

FROM: 
Pamela M. Grefsrud
PCRO Water Quality Program Manager

SUBJECT: Alyeska's Proposed Sag River
Repairs

I have just received the USACOE Public Notice for Alyeska's proposed Sagavanirktok River spur dike construction and repair. The Public Notice, T-910362, includes three proposed projects located at milepost's 22, 25.5 and 62.5. Although the proposed projects are similar, the volume of fill and in-stream water work varies at each site. The Public Notice states:

"No water quality monitoring is proposed due to the limited duration of impacts from this project. However, if the resource agencies request, Alyeska would provide a water quality monitoring plan to monitor effects of this activity. If required, this plan would document the beginning and ending of water quality effects."

As you probably already know, two proposed activities at milepost 22.5 will entail in-stream water work: channel excavation and construction of spur dike 3A. The timeframe for these activities was only briefly discussed during the joint meeting with Alyeska on January 21, 1994. At that time, in-stream water work was scheduled for August - October.

As previously stated in my email, ADEC will require that a water quality monitoring plan be submitted for review and approval prior to issuing the 401 Certification. The plan must include sampling parameters and their locations, analysis, etc., and all preventative measures that will be taken to decrease sediment loading during in-stream water work. The plan must meet with ADEC approval prior to issuing the 401 Certification.

An additional concern to ADEC is the material site that will be the source of gravel for in-stream fill. During the January 21, 1994 meeting, **Material Site 135-2, was the identified source for all three spur projects. According to Scott Rose, Contaminated Sites Program Manager, this material site has been previously reported as a diesel contaminated site; contaminated gravel, therefore, cannot be applied as fill in wetland or riparian ecosystems.**

Finally, during our January 21, 1994 meeting, APSC stated that the information provided had not been finalized or approved by their "project people". At that time they provided a draft workplan schedule, indicating the approximate time frames of activities at each of the mileposts. An updated workplan should be included in their coastal zone application and supporting documents.

MEMORANDUM

Department of Environmental Conservation

State of Alaska

State Pipeline Coordinator's Office

TO: Scott Rose
Environmental Specialist

DATE: May 6, 1994

FILE #: 330.02.109

FROM: Cathy Girard 
Environmental Specialist

PHONE #: (907) 278-8595

SUBJECT: Status of OMS 135-2

The purpose of this memo is to update you on the present status of this contaminated site. I handled the case while PCRO did not have a contaminated sites staff member, but now that you are working in contaminated sites, I'd like to transfer the case to you. Your contact people at Alyeska for this site are Steve Rettke and Jim Creiner (Pump Station 1 P&CM's) and Rich Ogar and Kate Montgomery (Field Environmental Specialists).

It seems like the contamination found at OMS 135-2 in October 1993 may be of a more suspicious nature than we had originally thought. Greg Assmus, a BLM special investigator, has been questioning me and Dave Perez regarding the site. He and Dean Crabbs, also of BLM, have been following up on a whistleblower complaint regarding the source and cause of contamination at the site. I have given Assmus and Crabbs a copy of the 330.02.109 file, my log book entry, telephone log entries, and photographs.

I am not sure where the case is heading, but if they decide there is enough information to pursue, I think they want to transfer it over to Sgt. Yates, the DEC investigator.

The area of contamination lies within the middle of the gravel pit. The Sag River covers the area most months of the year, but gravel would be accessible sometime between July and October. Rettke and Creiner should have the GPS locations of sample locations, and you could look at my site map to help you to better define the sampled area.

DNR is the responsible party, as neither Alyeska nor DOT/PF, both lease holders, have denied their association with the contamination. Alyeska said they have not mined gravel in that area since 1980/81, and DOT/PF has not operated on that site for many years as well. There is no evidence that points to any other involved parties.

I am attaching the OMS 135-2 working file and photographs with this memo.

Attachment

cc: Tom Chapple, Bob Flint, Dick McKean, ADEC/SPCO

SENT BY: ADEC NRO

4-24-92 11:150AM

ADEC

3072720890:# 2

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION OIL & HAZARDOUS MATERIALS INCIDENT NOTIFICATION

for official use only										
SPILL#	4	3	7	3	0	1	2	8	0	0
FILE#	330.02.109									
CLOSURE#	Date									
Closure authorized by:										

PERSON REPORTING DAVE PEREZ <u>Steve Retke</u>			PHONE 659-2532		
RESPONSIBLE PARTY (COMPANY NAME) <u>Alaska</u>			TYPE OF NOTIFICATION 1st party <input type="checkbox"/> 2nd party <input type="checkbox"/> 3rd party <input checked="" type="checkbox"/>		
DATE/TIME OCCURRED <u>UNKNOWN</u>		DATE/TIME REPORTED <u>10/7/93 10am</u>		KNOWLEDGE OF SPILL <u>10/7/93 early a.m.</u>	

INCIDENT DETAILS

LOCATION <u>EMS 135-2. (DALTON HWY MP 12)</u>			PRODUCT <u>PETROLEUM HYDROCARBON</u>		
QUANTITY SPILLED <u>UNKNOWN</u>	QUANTITY CONTAINED <u>STILL ON SITE IN GRAVEL</u>	QUANTITY RECOVERED <u>0</u>	QUANTITY DISPOSED <u>0</u>		
SOURCE OF SPILL <u>UNKNOWN</u>					
CAUSE OF SPILL <u>UNKNOWN</u>					

STATUS OF CLEANUP

CLEANUP ACTIONS <u>NONE</u>		
DISPOSAL METHODS <u>NONE</u>		
ENVIRONMENTAL DAMAGES <u>YES</u> NO	SURFACE AREA (SQ. FT.) <u>100' x 100'</u>	SURFACE TYPE (GRAVEL PAD, ETC.) <u>GRAVEL - MATERIAL SALE</u>
SITE REMEDIATION ACTIONS		

COMMENTS
SPILL WAS INITIALLY REPORTED TO DAVE PEREZ (ADNR-SPCO) WHO WAS @ PS 6 AT TIME OF SPILL DISCOVERY

PREPARED BY <u>Lathy Guard</u>	DATE <u>10/7/93</u>
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1ST PARTY - RESPONSIBLE PARTY ; 2ND PARTY - ON CONTRACT TO RESPONSIBLE PARTY ; 3RD PARTY - NO RELATIONSHIP TO RESPONSIBLE PARTY

FACSIMILE TRANSMITTAL



ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Spill Prevention and Response

610 University Avenue
Fairbanks, AK 99709-3643

PHONE: (907) 451-2153

FAX: (907) 451-5105

DATE: 12/8/98

TIME: 11:20

TO: Jeff Gineault

FILE NO.: 330.02 109

FAX NO.: 269-7649

TELEPHONE NO.: 269-3056

FROM: Renee Evans

SENT BY: ~~RONDA BENNETT SHEPARD~~

NUMBER OF PAGES (INCL. COVER SHEET): 3

COMMENTS: Info from file

FROM: Bill Smyth

TO: CathyG PCRO/ADEC

267-1250
DATE: 10-27-93

TIME: 12:56

CC:

SUBJECT: Sample Results at OMS 135-2

PRIORITY:

ATTACHMENTS:

Thanks for the information. I drove out to look at OMS 135-2 last week while up on the slope but didn't see much because of the snow covering the pad.
Bills

REPLY FROM: Bill Smyth FROM: Cathy Girard - ADEC

TO: Bill Smyth

DATE: 10-27-93

TIME: 11:09

CC:

SUBJECT: Sample Results at OMS 135-2

PRIORITY:

ATTACHMENTS:

Sorry Bill, you should have been on this list. Cathy

FORWARDED FROM: Cathy Girard - ADEC

FROM: Cathy Girard - ADEC

TO: Bob Flint - ADEC

DATE: 10-27-93

TIME: 11:08

CC: Carl Lautenberger - EPA

Cathy Girard - ADEC

David Perez - ADNR

Dennis Timmons - ADEC

Dick McKean - ADEC

Edward Barber - ADNR

Jerry Brossia - ADNR

Mike Thompson - ADF&G

Phil Brna - ADF&G

Robert Watkins - ADEC

Tim Law - ADEC

Tony Braden - ADNR

SUBJECT: Sample Results at OMS 135-2

PRIORITY:

ATTACHMENTS:

Hi Bob,

I just received the sample results from 8 samples I took at Alyeska's OMS 135-2 on October 10. All but one of the samples are above the state cleanup level for diesel in gravel pads (200 ppm) and range between 400 -- 2250 ppm. I also had 4 samples run of those 8 for chlorinated hydrocarbons (solvents, etc.) -- none of these compounds showed up.

In other words, the pad is contaminated for state standards, but not as bad as I had originally anticipated, and certainly not as bad as what we've seen on many North Slope pads.

We'll to get some kind of cleanup done on this for next summer. There's no responsible party at this time, so I would assume the 470 fund will try to be accessed.

Cathy

FROM: Tim Law - ADEC

TO: Cathy Girard - ADEC

DATE: 10-07-93

TIME: 10:12

CC: Tim Law - ADEC

SUBJECT: Petroleum Spill - Gravel Pit MP 12

PRIORITY: R

ATTACHMENTS:

Hi Cath.... I heard you may be traveling to prudhoe tomorrow so I thought I'd run this by ya....

Just talked w/ Rich Ogar, Alyeska. He stated that evidence of petroleum has been discovered in 2 sites (approx 150 yds apart) in a gravel pit at MP 12. The pit is apparently state owned. Excavation has been halted in the areas that have shown contamination. Rich stated that he reported the 1st site to Bob Flint a couple days ago and that he was calling to report the 2nd site today. This is the first I've heard of it.... Apparently, there is no "free flowing" product.... and no indication as to the source/cause of the petroleum contamination....

If you can get out to inspect this site would ya let me know.... thnx a bunch.... tim