



NOTICE OF RESIDUAL SOIL CONTAMINATION and MUNICIPAL SOLID WASTE at
TWO PARTY AGREEMENT SITE 4
ST. GEORGE ISLAND, ALASKA

Pursuant to 18 AAC 75.375, the City of St. George (the City) as the owner, and the U.S. Department of Commerce/National Oceanic and Atmospheric Administration (NOAA), as the operator, hereby provide public notice that property located about 5 miles southwest of the City and about ½ mile east of Zapadni Road in central St. George Island, Alaska, 99591 is contaminated with petroleum products and contains municipal solid waste. More specifically, the property is described as follows:

Lot 2

**Section 36, Township 41 South, Range 130 West, of the Seward Meridian, Alaska.
56° 35' 19.72" North Latitude, 169° 35' 38.67" West Longitude**

This property, hereafter referred to as Site 4 (Figures 1 and 2), has been subject to debris and petroleum contaminated soil from a discharge, or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 75, Article 3 as amended December 2006, and solid waste disposal, which is regulated under 18 AAC 60 as amended August 2003. Petroleum-contaminated soil (PCS) and solid waste present on this property must be managed in accordance with current and applicable laws. Site 4 is documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database under Reckey #1994250135447; File ID 2643.38.010.

Site 4 was identified as the *Active Landfill* pursuant to the *Pribilof Islands Environmental Restoration Two Party Agreement* (TPA) between the State of Alaska and NOAA (NOAA 1996). NOAA addressed the property as TPA Site 4 and NOAA Site 4. Following corrective action, NOAA submitted a request for confirmation of completion of corrective actions to the ADEC Division of Spill Prevention and Response, Contaminated Sites Program (NOAA 2003). ADEC determined, in accordance with 18 AAC 75.325(f)(1), that site cleanup has been performed to the maximum extent practicable even though residual petroleum contaminated soil remained on the property (ADEC 2004a). ADEC granted a conditional closure, in part subject to this institutional control (deed notice), and confirmed that no further corrective action was required at the site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare or the environment (ADEC 2004a).

Grantor: St. George Tanaq Corporation
4141 B Street, Suite 301
Anchorage, AK 99503

Grantee: City of St. George
PO Box 929
St. George, AK 99591

Recording District: Aleutian Islands

Remedial Actions and Residual Contamination

At the time of the TPA signing in 1996, Site 4 had been in operation as a municipal landfill/open-burning dump site for approximately 50 years (NOAA 2003). In 1994, 231 drums and 3 automotive batteries were removed from the site (Woodward-Clyde 1994). The majority of the drums were empty; those with contents were bulked and sampled for off-site disposal.

In 1995, an environmental investigation of Site 4 found no evidence of lateral migration of contaminants from the landfill to surrounding property, and found only diesel range organics (DRO) present in concentrations above applicable cleanup requirements (Woodward-Clyde 1995).

In 1997, 35 junked vehicles and equipment were removed from the site (Polarconsult 1997).

In 1999, 40 test pits were excavated at the site to delineate the landfill's extent and boundaries (EEG 2000). EEG's report noted that only domestic trash was encountered during test pitting; no large metallic objects, hazardous waste or containers suspected of containing hazardous waste were found.

In 2000, a contaminant fate and transport modeling study was conducted at the site to evaluate contaminant migration from the landfill and resulting potential risks to underlying groundwater and drinking water supplies (Tetra Tech 2000). Tetra Tech reported that the water table in the vicinity of Site 4 was about 250 feet below the ground surface, with the public water supply wells located 2.5 miles to the northeast. Based on SESOIL modeling, the report concluded that landfill contaminants were not likely to reach the water table in concentrations exceeding applicable groundwater cleanup levels, and that there was little potential for landfill leachate migrating to the island's drinking water supply.

In 2001, Site 4 was closed and covered with geotextile padding, geosynthetic clay liner, and eight inches of beach sand followed by 10 inches of scoria ballast (City of St. George 2003). However, an area in the southeast corner of Site 4 continued to be used by the City as an open burning dump until a new landfill became operational in 2006 (Figure 3).

In 2004, pursuant to PCS disposal discussions with NOAA, ADEC conducted a risk evaluation of the potential effects to human health from land farming PCS on St. George Island and determined that all associated risks were well below all risk management standards (ADEC 2004b). NOAA developed a SESOIL contaminant fate and transport model for PCS placed at the City's new landfill site, located southeast of Site 4, using PCS stockpile characterization results and other landfill site-specific data as model parameters (NOAA 2004). The model indicated that the PCS could be landspread at the new landfill site with minimal impact to the environment as long as model parameters of average contaminant concentrations and PCS stockpile depth were met. NOAA proposed that the PCS be used beneficially as berm construction material and municipal day cover at the new landfill; ADEC approved the proposal (NOAA 2004; ADEC 2004c).

In 2005, NOAA prepared an Environmental Assessment (EA) to disclose potentially significant impacts to the human environment associated with the treatment and/or disposal of PCS on St. George Island (NOAA 2005). The EA concluded that the preferred disposal alternative for PCS was to reuse it beneficially in the construction and operations of the City's landfill and treatment by landspreading.

In 2006, based on the results of SESOIL modeling and the conclusions of the EA (Tetra Tech 2000, NOAA 2004, NOAA 2005), NOAA and ADEC determined that PCS from a NOAA stockpile (Non-TPA Site 32) could be used beneficially to cover the City's active dump site in the southeast corner of Site 4. Use of the PCS as cover material reduced landfill closure costs for the City by eliminating the expense of excavating clean cover material. On April 7, 2006, NOAA and ADEC held a public meeting on St.



George that was attended by concerned island residents and representatives from the City Council and St. George Tribal Office. The purpose of the public meeting was to explain the modeling and associated parameters that led to the EA conclusion that landspreading at the City landfill sites was the preferred alternative for PCS disposal. NOAA and ADEC presented the data, and answered all questions to the satisfaction of those present. NOAA negotiated a purchase order with the City for moving PCS and sand bedding material from Site 32 to Site 4 (NOAA 2006). In October 2006, 6,500 cubic yards of PCS, sand bedding material, and temporary road material were removed from Site 32 and used as cover material at Site 4.

In 2007, Site 4's cover material was fertilized and seeded with native varieties of grasses.

Site Use

In the event that information becomes available which indicates that Site 4 may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator is required under 18 AAC 75.300 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations. Further site characterization and cleanup may be necessary under 18 AAC 75.325-.390 and 18 AAC 78.600. Also, any transport, treatment, or disposal of any potentially contaminated soil from the site requires notification to and approval from the Department in accordance with AAC 75.370(b) and 18 AAC 78.600(h).

In the future, ADEC approval is required prior to moving the soil cover over the solid waste at Site 4 pursuant to 18 AAC 60. If contaminated soil and solid wastes are removed from the site, the site must be characterized and managed following regulations applicable at that time including (1) 18 AAC 75.325(i), (2) 18 AAC 75.370, and (3) 18 AAC 60 as amended. ADEC approval is required prior to moving soil or solid wastes that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-.390, and 18 AAC 60 as amended.

This notice remains in effect until a written determination from ADEC is recorded that states that soil at the site has been shown to meet the most stringent soil cleanup levels in Method Two of 18 AAC 75.341(c) and that off-site transportation of soil is not a concern, and until all wastes are removed from the property.

References:

Alaska Department of Environmental Conservation (ADEC). 2004a. Letter from Louis Howard, Project Manager, ADEC, Division of Spill Prevention and Response, Contaminated Sites Program to John Lindsay, Pribilof Project Manager, NOAA; Subject: *Request For Confirmation of Completion of Corrective Action For Two-Party Agreement Site 4, Active Landfill, St. George, Alaska*. Letter dated January 13, 2004.

ADEC. 2004b. St. George Island Risk Evaluation Petroleum Contaminated Soils. Anchorage, Alaska. June 14.

ADEC. 2004c. Letter Approval. Petroleum Contaminated Soils Fate and Transport Modeling Summary, St. George Island, Alaska, October 2004. Anchorage, Alaska. October 29.

City of St. George. 2003. *Final Report, St. George Landfill Closure (NOAA Award Number NA77AB052) for Interim Closure of a Community Dump On St. George Island, Alaska*. March.



Environmental Enterprise Group (EEG). 2000. *Completion Report Pribilof Islands Project, St. George, Alaska*. South Carolina Research Authority, Environmental Enterprise Group, 1899 North Hobson Ave., North Charleston, S. C. 29405. March 15.

National Oceanic and Atmospheric Administration (NOAA). 1996. *Pribilof Islands Environmental Restoration Two Party Agreement*, Attorney General's Office File No. 66 1-95-0126. National Oceanic and Atmospheric Administration. January 26.

NOAA. 2003. Letter from John Lindsay, Pribilof Project Manager, NOAA to Louis Howard, Project Manager, ADEC, Division of Spill Prevention and Response, Contaminated Sites Program; Subject: *Request For Confirmation of Completion of Corrective Actions For Two Party Agreement Site 4, Active Landfill, St. George, Alaska*. Letter dated December 12, 2003.

NOAA. 2004. St. George Island Landspreading Alternative for PCS Treatment, St. George Island, Alaska. Seattle, Washington. October 28.

NOAA. 2005. Environmental Assessment, St. George Island, Alaska, Petroleum-Contaminated Soil Treatment/Disposal Project. Seattle, Washington. July.

NOAA. 2006. PCS Stockpile Relocation and Interim Landfill/Ash Disposal Cell Cover on, St. George Island, Pribilof Islands, Alaska. NOAA Contract AB133C06SE3981 with St. George, City of. Seattle, Washington. July 19.

Polarconsult Alaska, Inc. (Polarconsult). 1997. *Environmental Site Investigation, St. George Debris Cleanup & UST Decommissioning, Pribilof Islands Environmental Restoration Project*. Volume 3. December 31.

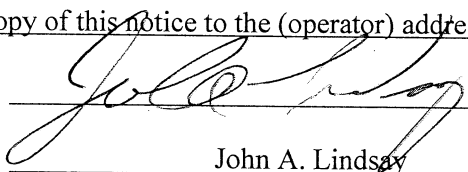
Tetra Tech Environmental Management, Inc. (Tetra Tech). 2000. *Vadose Zone Modeling Report, St. George Municipal Landfill, George Island, Alaska*. Seattle, Washington. April 28.

Woodward-Clyde. 1994. *Phase 1B Environmental Assessment, St. George Island, Alaska*. Woodward-Clyde, Anchorage, Alaska. March 31.

Woodward-Clyde. 1995. *Expanded Site Inspection, St. George Island, Alaska*. Woodward-Clyde, Anchorage, Alaska. March.

Please return original copy of this notice to the (operator) address below:

Signature:



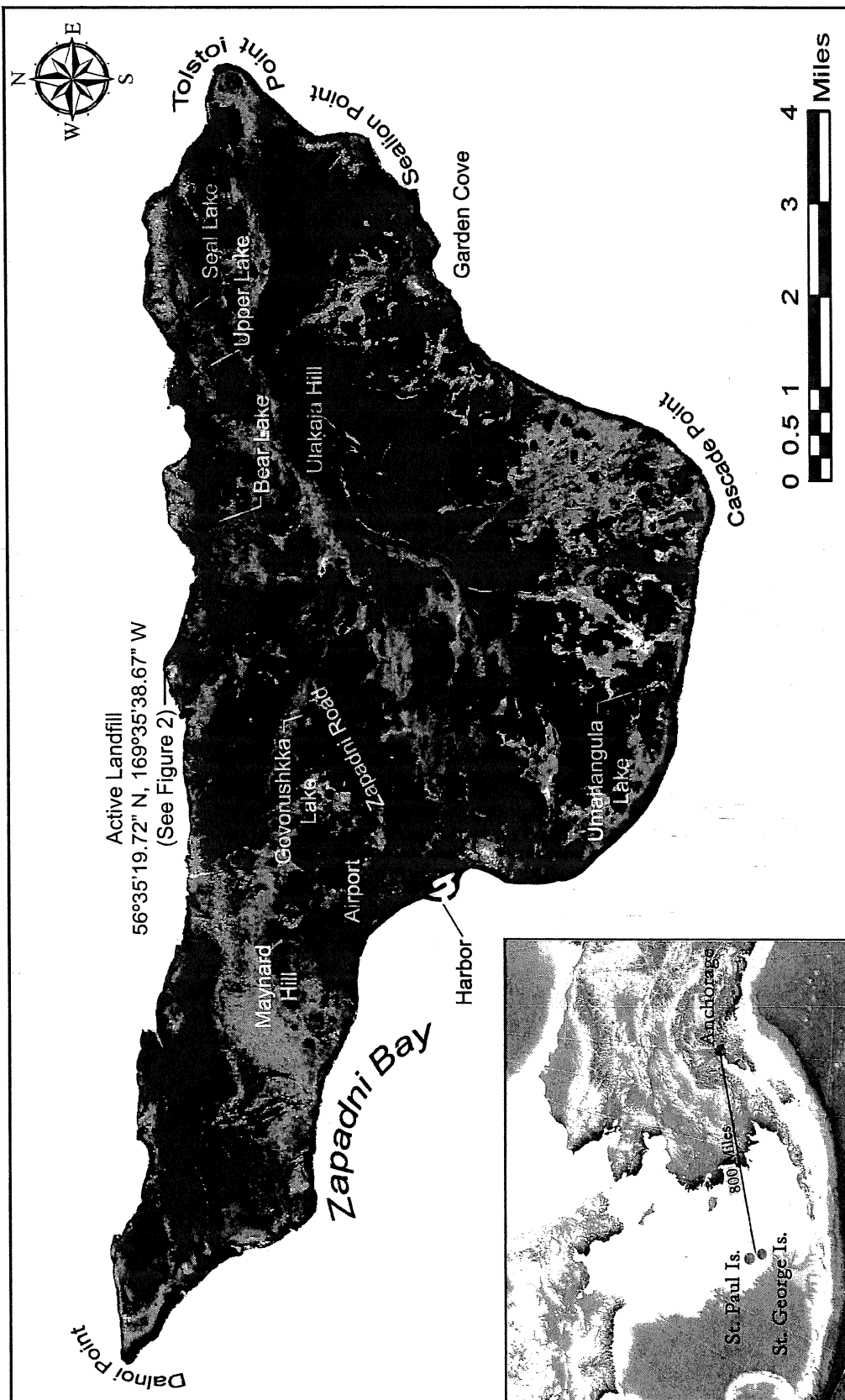
Printed Name:

John A. Lindsay

Mailing Address:

Attn: John Lindsay
US DOC, NOAA, NOS, OR&R, PPO
7600 Sand Point Way NE
Bldg 3, RM 1301
Seattle, WA 98115

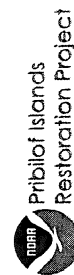




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(Space Imaging 2001)
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Fig 1 STG Standard - TPA 4.psd
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St. George Island Vicinity Map
Active Landfill
NOAA Site 4/TPA Site 4
St. George Island, Alaska

Figure
1



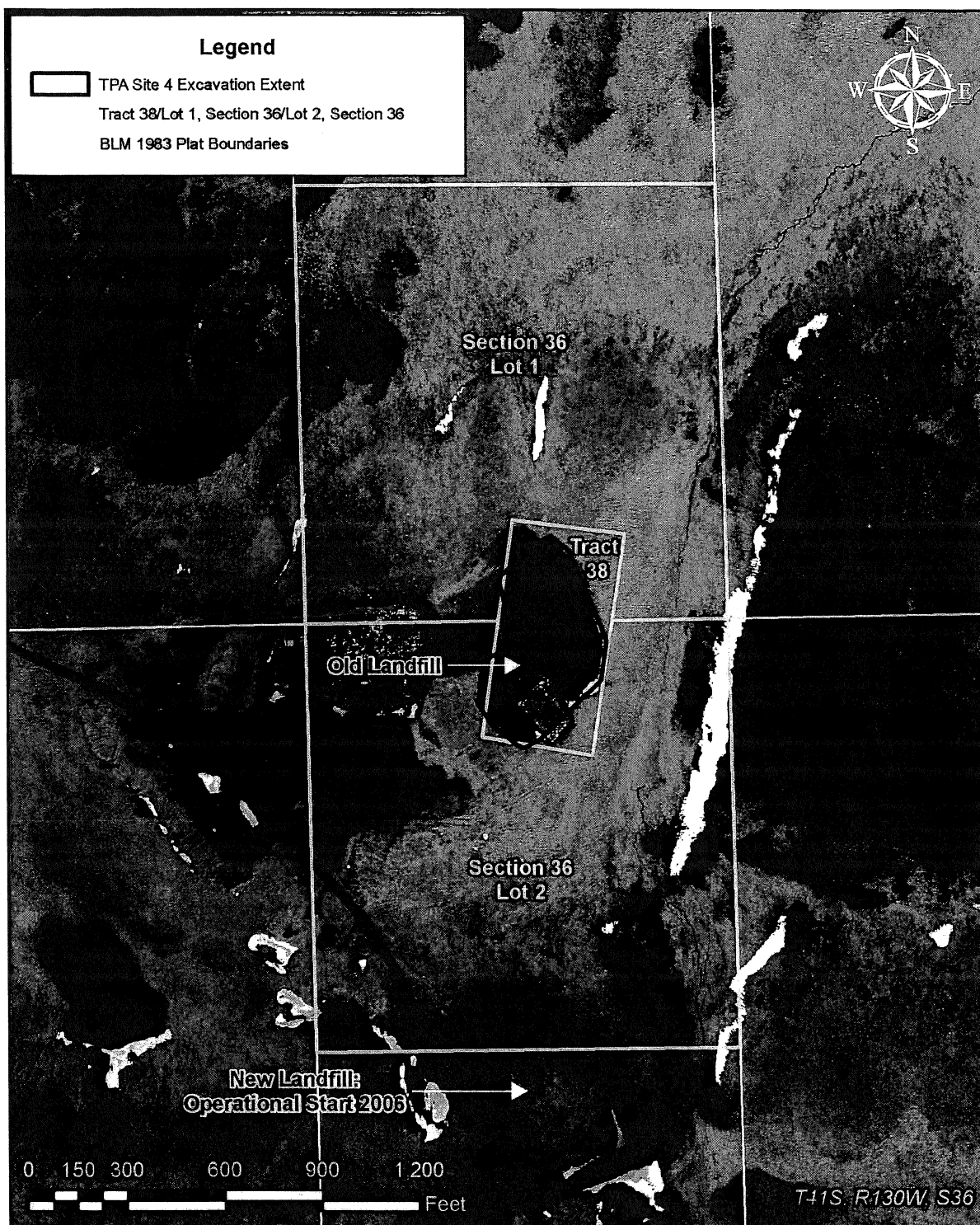


Figure 2	<p>Legal Property Description Map</p> <p>Tract 38/Lot 1, Section 36/Lot 2, Section 36</p> <p>Active Landfill</p> <p>NOAA Site 4/TPA Site 4</p> <p>St. George Island, Alaska</p>	<p>Source: Excavation Extent (NOAA PPO GIS), Aero-Metric 2006 1 ft Aerial Photo, 1983 Bureau of Land Management Land Survey Plat Officially filed February 15, 1985. Path: C:\KP_GIS Data\Maps & Figures\STG\Deed Notices\Active Landfill\Fig2_TPA4_PropDescription.mxd Date: 7/22/2008 @ 2:03:33 PM</p>
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