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2008-000392-0

Recording Dist: 305 - Aleutian Islands
8/11/2008 2:37 PM Pages: 1 of 10



NOTICE OF ENVIRONMENTAL CLEANUP AND RESIDUAL SOIL CONTAMINATION AT
TWO PARTY AGREEMENT SITE 9
ST. GEORGE ISLAND, ALASKA

Pursuant to 18 AAC 75.375, the St. George Community Council as the owner, and the U.S. Department of Commerce/National Oceanic and Atmospheric Administration (NOAA), as the operator of the subject property hereby provide public notice that property on the west and north sides of the Old Power Plant, otherwise known as Cottage G, in the City of St. George, St George Island, Alaska 99591 is contaminated with petroleum products. More specifically, the property is described as follows:

Lot 3, Tract 43

Section 29, Township 41 South, Range 129 West, of the Seward Meridian, Alaska.

56° 36' 9.44" North Latitude, 169° 32' 55.89" West Longitude

This property, hereafter referred to as Site 9 (Figures 1 and 2), has been subject to 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. Adequate soil cover needs to be maintained over the residual petroleum contaminated soil. If contaminated soil is exposed in the future, it must be managed in accordance with laws applicable at that time. These releases and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database under Reckey #2006250913802; File ID 2643.57.001.

This site was identified as *Site 9, Old Power Plant* 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 9 and NOAA Site 9. Following corrective action, NOAA submitted a request for conditional closure for Site 9 to the ADEC Division of Spill Prevention and Response, Contaminated Sites Program (NOAA 2005a). ADEC determined, in accordance with 18 AAC 75.325(f)(1), that Site 9 cleanup has been performed to the maximum extent practicable even though residual petroleum-contaminated soils remained on the property (NOAA 2005a). ADEC granted a conditional closure, in part subject to this institutional control (deed notice), and confirmed that no further remedial 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 (NOAA 2005a).

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

Grantee: St. George Community Council
PO Box 940
St. George, AK 99591

Recording District: Aleutian Islands

Remedial Actions and Residual Contamination

A diesel generator-driven power plant was constructed at Site 9 in the mid 1930s. The facility included eleven aboveground storage tanks (ASTs) used to store diesel fuel, gasoline, and lubricating oil and a wood-framed building that housed the generators. The ASTs were located on wooden platforms along the west and southwest sides of the building. Fuel was transferred to the ASTs, via a gravity fed pipeline, from drums staged at the Former Fuel Storage Area (TPA Site 18) located south of the power plant (NOAA 2004). The Site 9 power plant was taken out of operation in 1964 when a new power plant came on-line.

Environmental investigations conducted in 1995 (Hart Crowser 1997) and 2001 (Tetra Tech 2002) found evidence of diesel range organics (DRO) and residual range organics (RRO) at Site 9. The Tetra Tech investigation also identified two Site 9 locations where lead was found at concentrations above the ADEC Method Two residential land use cleanup criterion of 400 milligrams per kilogram (mg/kg) (Tetra Tech 2002, ADEC 2006). In 2003, NOAA collected six subsurface soil samples from the north side of the power plant building to investigate anecdotal reports of waste oil and transformer dielectric dumping at this location. Samples were analyzed for DRO, RRO and polychlorinated biphenyl (PCB). Analytical results indicated that all six samples exceeded the ADEC Method Two cleanup criterion for DRO; RRO was detected, but did not exceed the ADEC criterion; and PCB was not detected in any of the samples (NOAA 2004). In 2004, Tetra Tech collected PCB confirmation samples from the north side of the building; PCB was not detected in any of the confirmation samples (Tetra Tech 2005a).

In 2004, approximately 17 cubic yards of soil was excavated from the two locations where the 2001 Tetra Tech investigation found lead above the ADEC cleanup criterion. Confirmation sampling verified that remaining lead concentrations in the soil were below ADEC requirements (Tetra Tech 2005a). The lead-contaminated soil was subsequently shipped off-island for disposal. Excavation of petroleum-contaminated soil (PCS) at Site 9 was conducted after removal of the lead-contaminated soil. Initial areas of excavation were selected based on contamination identified during previous investigations, while the extent of excavation was guided by thin-layer chromatography (TLC) field screening as well as visual and olfactory observations (Tetra Tech 2005a). During this corrective action, PCS was removed in three non-contiguous excavations because of the presence of an active sewer line and the power plant building (Figure 3). PCS removal was accomplished to the maximum extent practicable. The extent of each excavation was expanded vertically and laterally in all directions until TLC field screening indicated that concentrations of contaminants were below ADEC Method Two cleanup levels, or until the presence of obstructions (e.g., utilities, structures, or equipment refusal) prevented further excavation. Approximately 1,230 cubic yards of PCS was excavated and removed from Site 9. The excavations were backfilled with clean material; erosion control matting was placed over the disturbed areas, and a mixture of native seed and fertilizer was spread to promote the re-growth of vegetation (Tetra Tech 2005a).

Cleanup confirmation samples were analyzed for DRO, RRO, benzene, toluene, ethylbenzene, xylene, polynuclear aromatic hydrocarbons and PCB (Tetra Tech 2005a). Analytical results indicated that DRO remains in concentrations above its ADEC Method Two cleanup criterion in each of the excavations. RRO contamination above its ADEC Method Two cleanup criterion remains in one location next to and under the building's west foundation. No other contaminants were found above applicable cleanup requirements. Figures 4 through 6 are drawn to scale and show the areas that have been cleaned up, the locations where confirmation soil samples were collected, and the approximate locations of remaining soil contamination based on confirmation sample results.

In 2001 and 2003, NOAA installed a total of five groundwater monitoring wells in the vicinity of Site 9. Groundwater samples collected from these wells from 2001 through 2004 were analyzed for DRO, gasoline range organics, volatile organic compounds, semivolatile organic compounds, and metals.



Analytical results indicated that groundwater had not been adversely impacted by contaminant migration from Site 9 (Tetra Tech 2005b). These monitoring wells were decommissioned in 2005 and removed in 2006 in accordance with an ADEC approved long-term groundwater monitoring plan (NOAA 2005b).

Site Use

In the event that information becomes available which indicates that the site 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).

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.

References:

Alaska Department of Environmental Conservation (ADEC). 2006. 18 AAC 75, Articles 3 and 9. *Oil and Hazardous Substances Pollution Control Regulations*. State of Alaska. Amended through December 2006.

Hart Crowser. 1997. *Expanded Site Inspection, St. George Island, Pribilof Islands, Alaska*. January.

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. 2004. *Corrective Action Plan (Final) for Petroleum and Lead-Contaminated Soil Removal at the Old Power Plant (Two-Party Agreement Site 9, St. George Island, Alaska)*. June 4.

NOAA. 2005a. *Conditional Closure Request, Old Power Plant, TPA Site 9/NOAA Site 9, St. George Island, Alaska*. Signed by John Lindsay (NOAA) and submitted September 15, 2005. Signed by Louis Howard of ADEC Contaminated Sites Program, September 22, 2005.

NOAA. 2005b. *Long-Term Groundwater Monitoring Plan (Final), St. George Island, Alaska, Pribilof Islands Environmental Restoration Project*. August 29.

Tetra Tech EM Inc. (Tetra Tech). 2002. *Draft Site Characterization Report, Former Fuel Storage Area, Two-Party Agreement Site No. 18, Pribilof Islands Site Restoration, St. George Island, Alaska*. April 19.

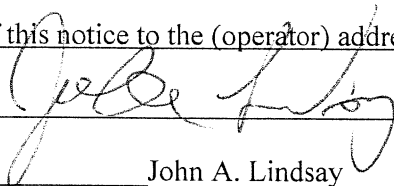
Tetra Tech. 2005a. *Corrective Action Report (Final), Site 9/TPA Site 9 – Old Power Plant, St. George Island, Alaska*. Prepared for National Oceanic and Atmospheric Administration, National Ocean Service, Office of Response and Restoration, 7600 Sand Point Way NE, Seattle, WA. 98115. July 6.

Tetra Tech. 2005b. *Field Investigation Report (Final), St. George Island, Alaska, Pribilof Environmental Restoration Project*. June 23.



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

Signature:



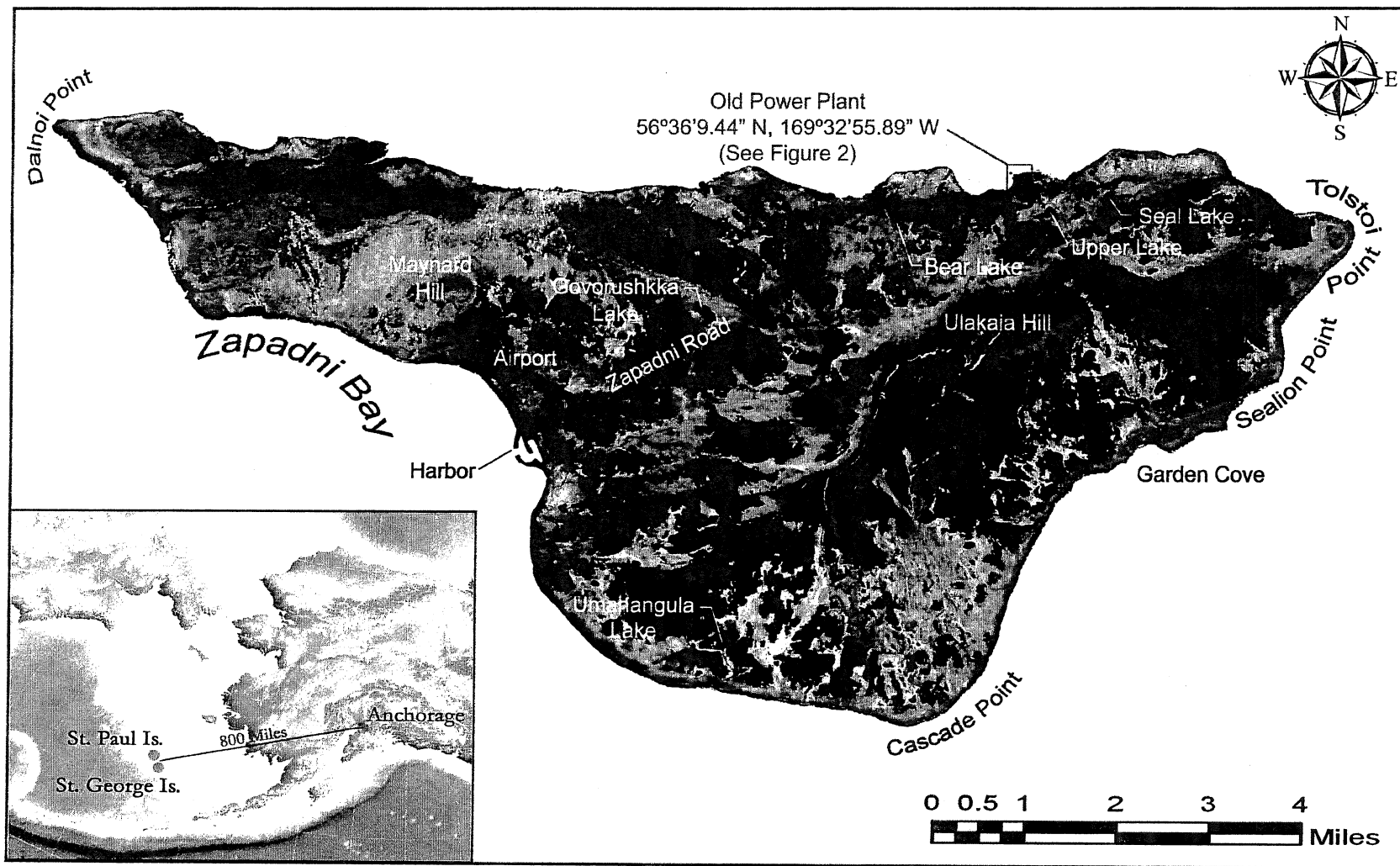
Printed Name:

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



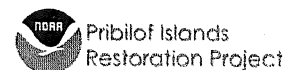


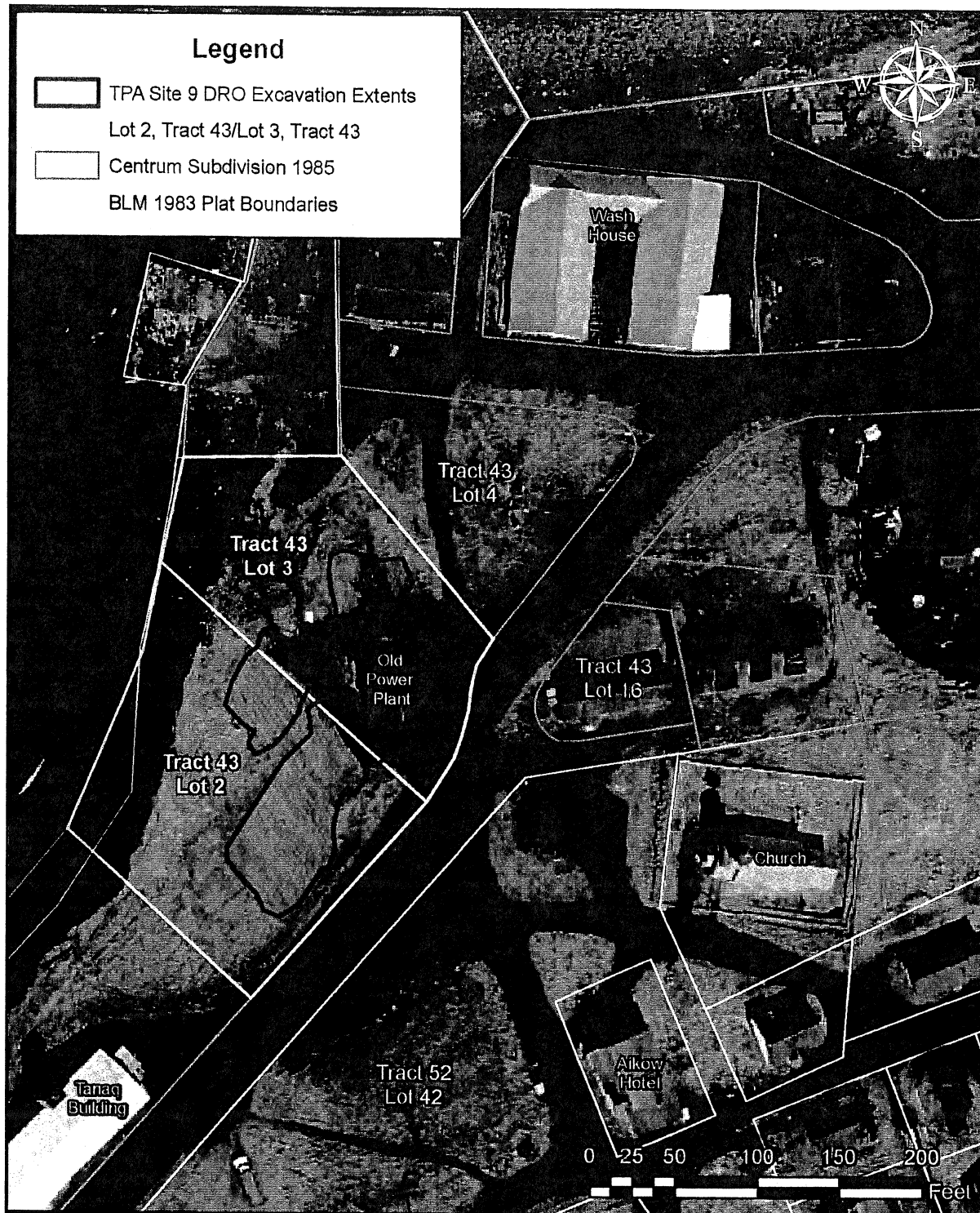
Figure

1

**St. George Island Vicinity Map
Old Power Plant
NOAA Site 9/TPA Site 9
St. George Island, Alaska**

Source: Ikonos Satellite Imagery
(Space Imaging 2001)
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Fig 1 STG Standard - TPA 9.psd
Date: 07/30/2008





Figure

2

Legal Property Description Map
Tract 43, Lot 2/Tract 43, Lot 3
Old Power Plant
NOAA Site 9/TPA Site 9
St. George Island, Alaska

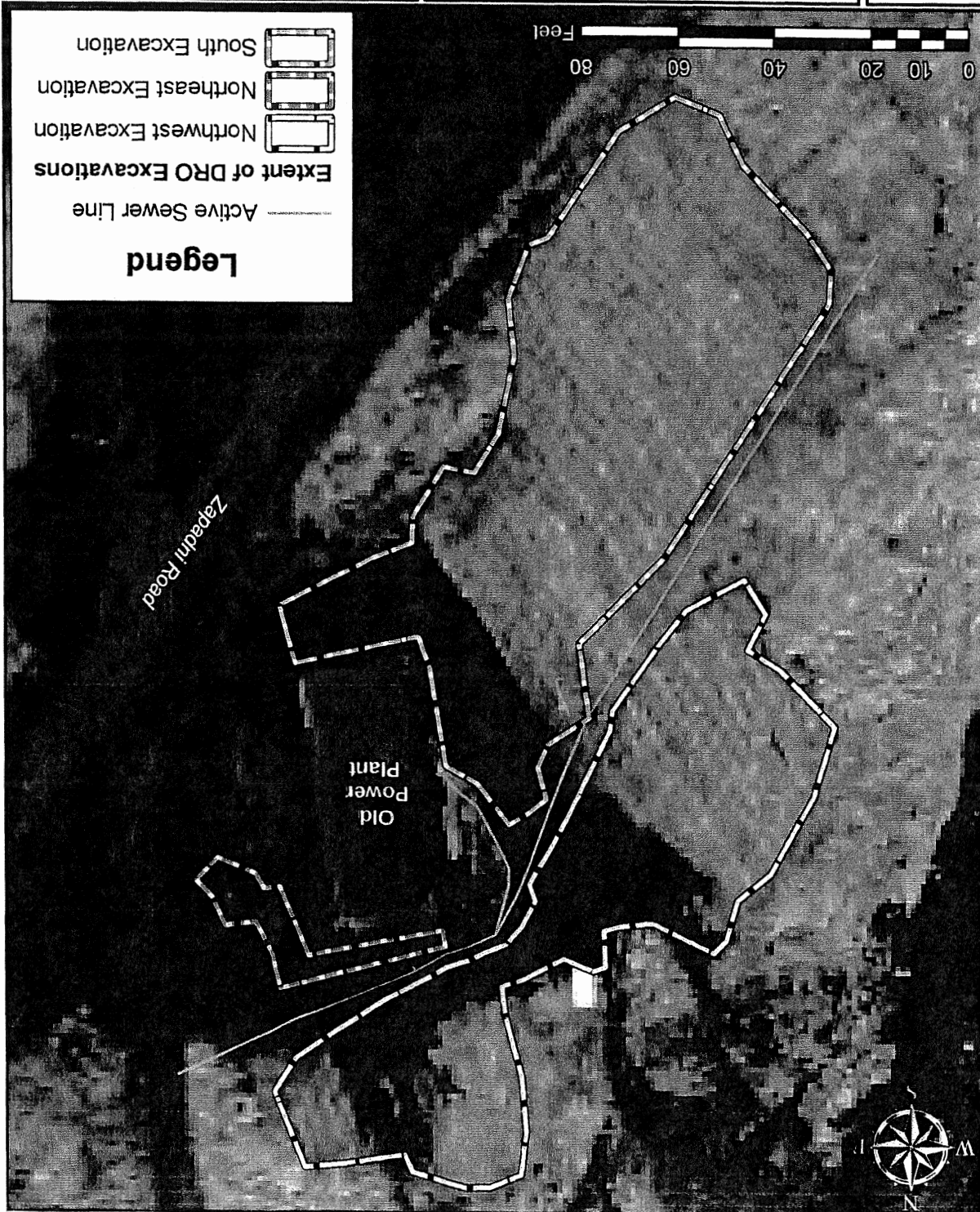
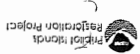
Sources: Excavation Extent (NOAA PPO GIS),
 Aero-Metric 2006 1 ft Aerial Photo, 1983 Bureau of
 Land Management Land Survey Plat Officially Filed
 February 15, 1985. Centrum Subdivision 10/31/85.
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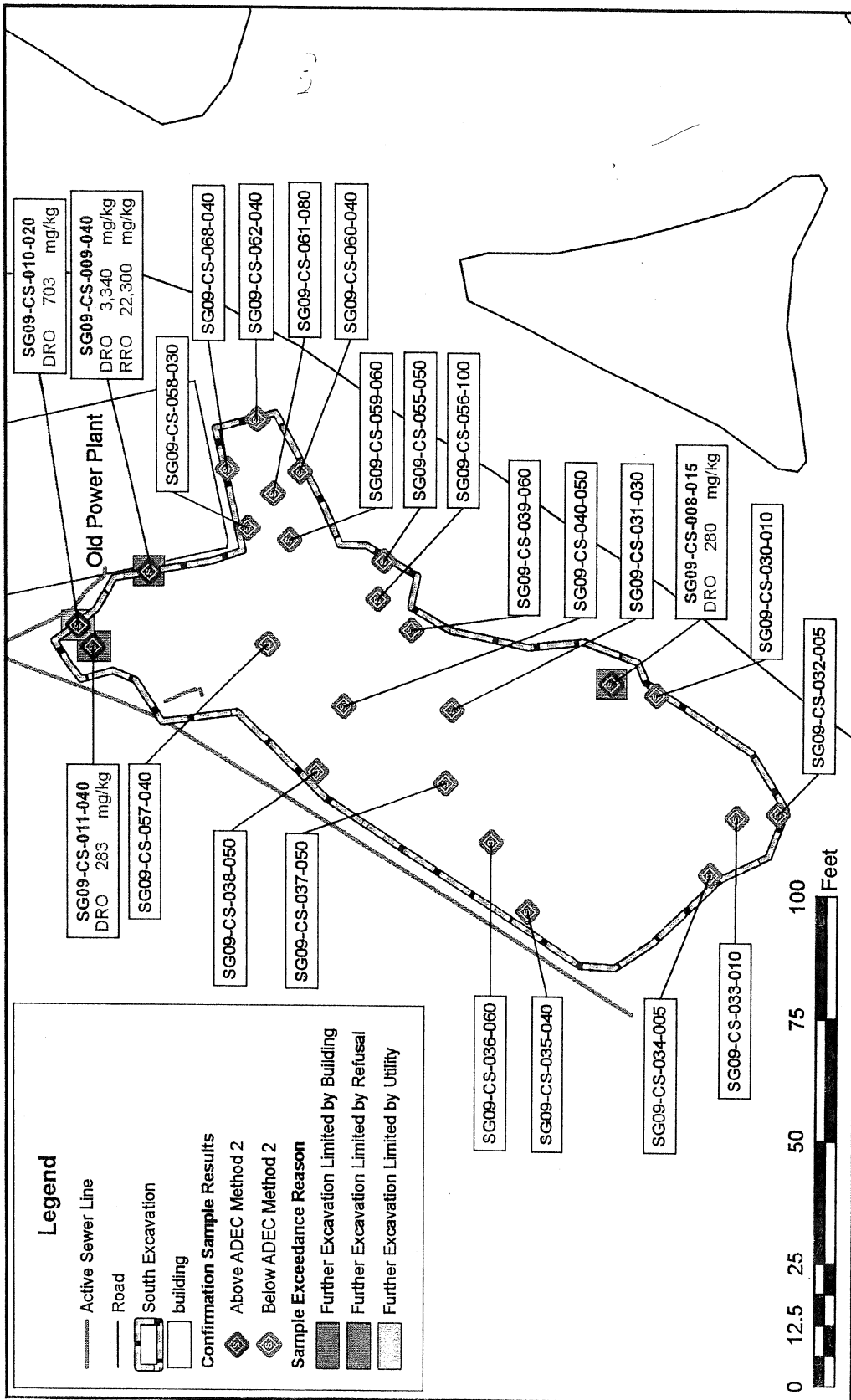
Pribilof Islands
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Figure
3

Old Power Plant Site Overview
NOAA Site 9/TPA Site 9
St. George Island, Alaska

Sources: TPA Site 9 Layers
(NOAA PPO GIS),
Aero-Metric 1 ft 2006 Aerial Photo
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STG\Deed Notices\Old Power Plant\
Fig3_TPA9_Overview.mxd
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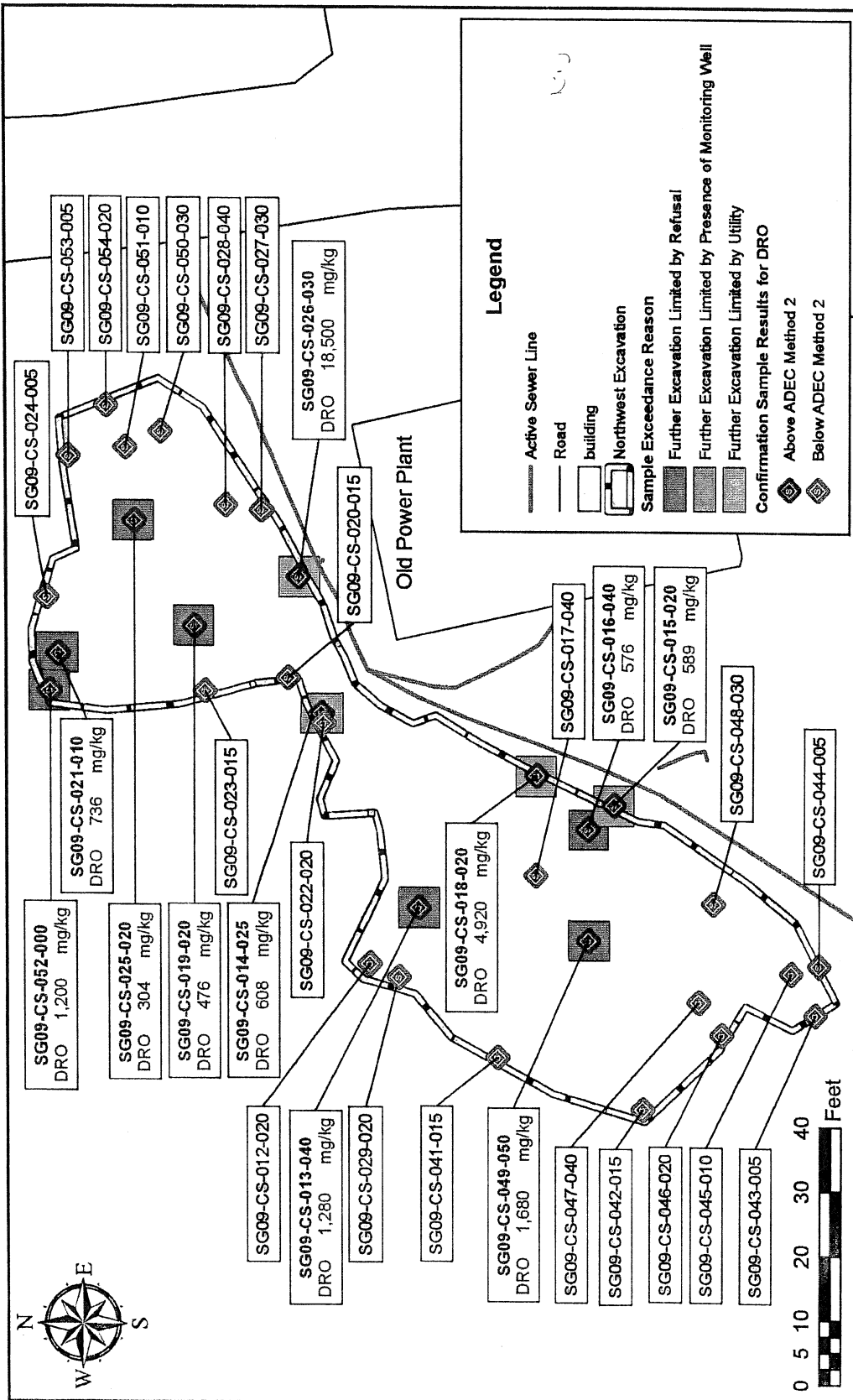




Sources: TPA Site 9 Layers (NOAA PPO GIS);
 Survey Data Collected by Pribilof Project
 Staff July 2004.
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 Fig4_TPA9_So_Samples&Excavation.mxd
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**Final South Excavation Extent &
 Confirmation Sampling Results
 Old Power Plant
 NOAA Site 9/TPA Site 9
 St. George Island, Alaska**

Figure 4

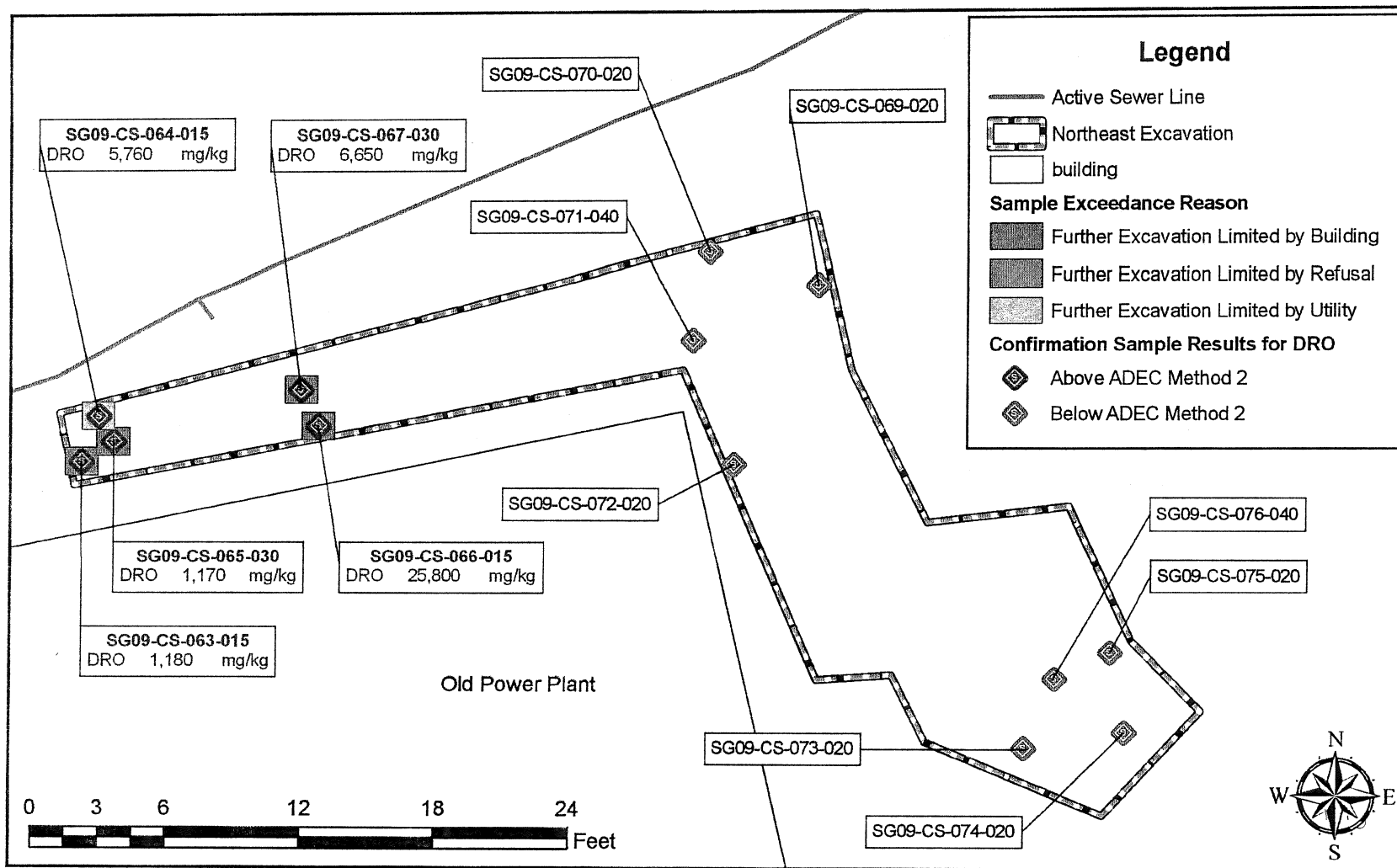


Sources: TPA Site 9 Layers (NOAA PPO GIS);
 Survey Data Collected by Pribilof Project
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 Fig5_TPA9_NW_Samples&Excavation.mxd
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**Final Northwest Excavation Extent &
 Confirmation Sampling Results
 Old Power Plant
 NOAA Site 9/TPA Site 9
 St. George Island, Alaska**

**Figure
 5**





Figure

6

**Final Northeast Excavation Extent &
Confirmation Sampling Results
Old Power Plant
NOAA Site 9/TPA Site 9
St. George Island, Alaska**

Sources: TPA Site 9 Layers (NOAA PPO GIS);
Survey Data Collected by Pribilof Project
Staff July 2004.
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Fig6_TPA9_NE_Samples&Excavation.mxd
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