

July 8, 1991

John Haley, Environmental Specialist
Alaska Department of Environmental Conservation
P. O. Box 1207
Soldotna, Alaska 99669

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DEPARTMENT OF
ENVIRONMENTAL CONSERVATION
KDO

Subject: Plan Statement and Timeframe
Alaska Roadbuilders Gravel Pit Cleanup

Dear Mr. Haley

Reference is made to your June 5, 1991 Notice of Violation/Request for Corrective Action sent to Ron Davis, Owner of Alaska Roadbuilders. I have been hired to perform the site assessment of the unknown petroleum-type substances and spills referenced in your letter. In response to Item No. 1 in the letter, the plan and timeframe for dealing with this violation is as follows:

1. Interview Alaska Roadbuilder personnel and collect basic information on prior activities at the site. *This has been done.*
2. Conduct a brief site inspection to determine the type, quantity and location of petroleum products and/or spills, and whether containment is needed at this time. *This has been done. The "high viscosity type petroleum product spill" is reported to be CSS-1, a liquid asphalt emulsion product. This is commonly diluted with water and applied for dust control or as a tack coat on surfaces to insure there is a bond with overlying pavement. Most of the spilled materail has thickened and formed a thin layer on the ground in an area approximately 90 feet by 120 feet. Some CSS-1 apparently ran part way down a ditch to the lower pit floor. There are also two large piles and several scattered 55-gallon drums, most appeared to be empty. No leaking drums were detected during the brief inspection. Soil beneath several equipment frames was stained with a petroleum-type material, probably oil, hydraulic fluid or grease. All observed "spills" are stable and no containment is needed. There is no apparent threat to groundwater or to the public.*
3. Prepare a written QA/QC plan for soil sampling, cleanup and disposal and submit to ADEC for review and approval prior to undertaking any field work. *This is currently in progress and expected to be complete by July 17, 1991. The plan is being prepared according to the ADEC Interim Guidance for Soil Cleanup Levels, dated September 26, 1990. A plan for short term storage of contaminated soils will also be included.*

4. Collect and test soil samples and cleanup contaminated soils according to the plan approved by ADEC. Plan approval is assumed to take 30 days. *Samples will be collected and any apparent contamination will be cleaned up within three weeks after receipt of written plan approval (Aug. 17 - Sept 6). Chemical & Geological Laboratories of Anchorage, will perform the testing; it usually takes them two to three weeks for analysis and reporting. (Sept. 6 - Sept. 28)*

5. Prepare an Interim Corrective Action Report of sampling and cleanup after laboratory test results are available. *Allow two weeks (Sept. 30 - Oct. 14). Prepare a Final Corrective Action Report after any soil or product disposal is completed. This will depend on availability of approved disposal facilities. Allow two weeks for Final Report after disposal is complete.*

If you have questions about this plan statement or the Corrective Action Plan please call me. My FAX number is 283-5640.

Sincerely,



Ronald T. Rozak, P.E.
Consultant

cc: Blake Hardina, Manager - Alaska Roadbuilders