



Office of Risk Management



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A Division of Human Resources

Charlie Pierce
Borough Mayor

April 8, 2021

Alaska Department of Environmental Conservation, Contaminated Sites
555 Cordova Street
Anchorage, AK 99501

Attention: Jessica Hall – mail to: CS.Submittals@alaska.gov or from 20 MB to 8GB send to Alaska ZendTo “drop-off” option at <https://drop.state.ak.us/drop/>

Ref: ADEC Hazard ID 4272
South Peninsula Hospital 2006 Expansion Closure Report
File 2314.38.028
Response to ADEC’s March 5, 2021 Letter

Please accept this report for the closure of the 2006 Expansion of the South Peninsula Hospital (SPH), Homer Alaska. The following information is in response to the Matrix included with Alaska Department of Environmental Conservation’s (ADEC) March 5, 2021 letter to the Kenai Peninsula Borough (KPB).

Response to ADEC’s Letter Matrix #3, #9 and #10:

The reports and drawings available are the following:

1. Attachment 6 from the KPB Response to ADEC dated February 11, 2021
2. 9/28/1999 Ron Rozak’s Underground Storage Tank (UST) Site Assessment & Release Investigation Report (UST Closure Report/UST Removal)
3. 1/17/2001 Ron Rozak’s Corrective Action Report - Clinic Drainage Trench
4. 10/12/2004 Ron Rozak’s Report for Environmental Sampling of Former Clinic Site
5. Summer 2006 Northern Geotechnical Engineering, Inc – Terra Firma Testing Inspection Reports (subset)
6. 3/8/2006 SPH East Addition & Alterations – Phase 1 – 2006 Drawings (subset)
7. 5/20/2008 SPH East Addition & Alterations - Phase 2 - 2008 Drawings (subset)

Items 1 through 6 above are included with this response. It is strongly encouraged that a few moments be taken to review these reports and drawings. In addition, ADEC may have other useful reports associated with this site work that may have been submitted directly to ADEC and not to the KPB.

Attachment 6 (included) from the KPB Response dated February 11, 2021 is the appropriate figure to show where the third area of contamination was located. It is identified as the “2006 Clean-up Area”, located about center of the figure just above the “Former UST, removed 1999” (Facility ID 3274) area and was part of the Phase 1, 2006 Expansion (Facility ID 4272). No report has been located to confirm the area had contaminated soil excavated. However, the drawings for Phase

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1 and 2 (both under Facility ID 4272), included with this report, show new construction is built over that area. In addition, the Clinic Drainage Trench Report confirms the east side of the area is clean and east of the Clinic Drainage Trench is the Former Medical Clinic; the location with the Former Medical Clinic Site confirmation report, dated 10/12/2004, confirms that this site is clean.

Please see Sheets No. C1.03 and C1.04 of the East Addition & Alterations, Phase 1, 2006 subset of drawings and compare to Attachment 6. On Sheet C1.03, see the upper middle section identified as the New Hospital Addition. Please note that the east side boundary line of the New Hospital Addition correlates to the yellow line on Attachment 6 that is generally north to south and intersects the east west yellow line on the south end. The New Hospital Addition incorporates the 2006 Clean-up Area west of the southeast boundary. On Sheet C1.04, see the "Enlarged Site Plan – Emergency Entry" figure for a close up of the area described. The 2006 Clean-Up Area is generally north of the 336.0 elevation line. Unfortunately, a Phase 1 construction report is not available. However, standard construction methods dictate that any contaminated soil and/or soil that could not be used, as a foundation for a building be removed/replaced.

The January 17, 2001 Corrective Action Report-Clinic Drainage Trench states on Page 4 under Analytical Results, that Field Screening and soil samples were collected from the old trench and that residual contamination remains but the concentrations are below the proposed clean-up levels shown on page 2. On Page 7 under Conclusions, paragraph 1 states that almost all of the fuel contaminated soil has been removed at the two sites (UST Removal and the Drainage Trench). It is estimated that less than 20 cubic yards of diesel range organics (DRO) contaminated soil remains at two inaccessible locations – below water on the bottom of the UST tank pit and beneath the concrete-encased electrical service at the north end of the UST tank pit. The north area at the north end of the UST tank pit correlates to the 2006 Clean-Up area on Attachment 6.

According to Jack Cushing (certified engineer on the projects), he field screened the 2006 Clean-Up Area soil with the Organic Vapor Monitor (OVM) and any contaminated soil was removed and recycled at ASR in Anchorage. However, a report to show this is not available. It would be under Facility ID 4272, 2006 Expansion.

Terra Firma - Inspection Reports:

Please see the Northern Geotechnical Engineering, Inc – Terra Firma Testing Inspection Reports and Sheets C4.01 to C4.05 and C5.01 to C5.03 of the Phase 1 2006 drawings. The Inspection Reports are a good reference with photographs of retaining wall construction work. The Sheets show the Retaining Walls locations and how constructed. The Inspection Reports show the depth that excavation occurred to confirm no contamination or unusable soil is present in the areas that are next to the New Hospital Addition.

Please see the Inspection Report dated 8/21/06. The photograph shows where the west end of Retaining Wall #1 intersects with the southeast corner of the New Hospital Addition. Note the depth of the excavation. For reference, also see Sheets C4.01 to C5.03 of Phase 1 that show where the Retaining Walls are located and how constructed.

Jack Cushing (Certified Engineer) reportedly was onsite with an OVM to monitor the sides and bottom of the excavations, stockpiled soils and verbally confirmed that all of the contaminated

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soils were removed and sent to ASR in Anchorage for recycling during the Phase 1 and Phase 2 construction work. Contractor Ron Rozak was expected to provide the final closure reports for the Phase 1 and Phase 2 work. However, he was unable to locate them.

Water and Remaining Soils:

Additionally, the water samples collected July 24, 2000 as discussed on Page 7, paragraph 4 of the Clinic Drainage Trench report had no detectable levels of DRO, Gasoline Range Organics (GRO) or benzene. This is believed to be due to the UST removal the previous year.

In the September 28, 1999 Underground Storage Tank Site Assessment and Release Investigation Report (UST Closure Report, Facility Number 3274), page 4, paragraph 2 states the following: Most of the gravel in the excavation pit was removed. About 15 to 20 cubic yards of contaminated bedding was left in the bottom of the pit because it was below water level, and could not be excavated. Additionally, 3 to 4 cubic yards of material could not be excavated from underneath the concrete utility corridor at the north end of the pit. In the UST Closure Report see the figure titled Soil Sampling Plan – 20,000 Gal UST Site (page 11, dated 09/01/1999) for the utility corridor location. The corridor generally runs east west across the north end of the UST tank pit. In addition, no free product was evident in the excavated pit except a slight sheen on the water in the UST tank pit. Absorbent pads were spread out on the water surface to absorb any fuel. However, a course rock layer, was found about 5 feet below the asphalt level in the northeast corner of the UST Tank pit. Water and free product seeped out of the course rock layer after it was exposed. The rock layer was not removed, but the contaminated soil area around it was excavated on 09/03/1999.

Conclusion:

KPB believes the remaining contaminated soils under the corridor which correlates to the 2006 Clean-Up Area have been removed. However, only the Phase 1 and 2 Drawings are available to show that the entire area under the hospital most likely was excavated to accommodate the new additions. Many samples in the reports were below the ADEC clean-up levels. If any DRO contaminated soil remained, it has most likely dissipated through natural attenuation.

Therefore, based on the information that is available, KPB request that this report be accepted as the SPH 2006 Expansion Closure Report with no further action required.

Please contact me at 907-398-1968 if there are any other questions.

Sincerely,

Patti Williams
KPB Environmental Compliance Manager