



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 1529.38.021

March 8, 2022

Via electronic mail only

Amber Al-Haddad
Director of Public Works and Capital Projects
City & Borough of Wrangell
PO Box 531
Wrangell, Alaska 99929

Re: Decision Document: Wrangell Power Plant
Site status change to Active for further investigation

Dear Ms. Al-Haddad,

The Alaska Department of Environmental Conservation, Contaminated Site Program (DEC) has completed a review of the environmental record associated with the Wrangell Power Plant property, located at 1064 Case Avenue in Wrangell, Alaska. This review includes the details in DEC's 2017 Cleanup Complete – Institutional Controls (ICs) determination document and the landowner-led December 2021 *Phase II Environmental Site Assessment* for this property.

The information provided in the 2021 assessment documented areas of contamination in the soil and groundwater on this property which are not fully delineated. The results of this assessment include contaminants already identified in site work prior to 2017 which were left in place with institutional control protective measures. Additional contaminants identified in this assessment that were not included in the original characterization were polychlorinated biphenyls (PCBs) and petroleum hydrocarbons in groundwater in concentrations above regulatory cleanup levels. For this reason, further characterization will be required and the site record for the Wrangell Power Plant will be changed to Active status in the DEC's site record.

Historical details documented in the DEC 2017 Cleanup Complete - ICs decision letter-

The DEC letter documented that the original contaminant source was a subsurface vault housing and previously abandoned piping junction between a large above ground storage tank and the power plant building. This contamination was discovered in 2010 while excavating a utility corridor approach to the power plant. The cleanup levels set for this site were the most stringent levels of all applicable pathways under Method Two soil cleanup levels and Table C cleanup levels for groundwater. Characterization and

cleanup activities began in 2010. A total of 58 cubic yards of contaminated soil were removed from the site and landspread at the Wrangell Landfill.

Documented in this letter were data gaps regarding remaining contamination. The letter included the statement of “Due to structural obstacles and the depth of contamination at groundwater, complete removal was deemed not possible and made it difficult for Travis Peterson Environmental Consultants to provide an estimate of the extent of contamination remaining at the site.”

Elevated concentrations of diesel-range organics (DRO) and several polyaromatic hydrocarbons were left in place with the highest contaminant locations on the east side of the power plant. The highest concentrations remaining were:

| <u>Contaminant</u> | <u>Soil (mg/kg)</u> | <u>Depth (bgs)</u> |
|---------------------|---------------------|--------------------|
| DRO | 19,600 | 5' |
| 1-methylnaphthalene | 21.2 | 5' |
| 2-methylnaphthalene | 23.1 | 5' |
| Naphthalene | 4.1 | 5' |

mg/L = milligrams per liter
bgs = below ground surface

A single groundwater sample was taken and analyzed for DRO and residual-range organics (RRO) with concentrations below cleanup levels for both.

As there was soil contamination which could not be excavated, the following ICs were required to ensure that the cleanup remained protective:

- 1. A restriction against future excavation of the utility corridor at the Wrangell Power Plant property without coordinating with DEC prior to beginning such action. In the event that the remaining contaminated soil becomes accessible by excavation or through some other actions that fits the site circumstances, or other information becomes available which indicated that the site may pose an unacceptable risk to human health, safety, welfare or the environmental, the landowner and/or operator are required to notify DEC and evaluate the environmental status of the contamination in accordance with the applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 75.325-.390.*
- 2. A restriction on installing groundwater wells or using groundwater from the site without DEC approval.*
- 3. Standard site closure conditions.*

Details included in the 2021 Phase II Environmental Site Assessment

During this assessment, petroleum sheening and odor were observed. Contaminant concentrations above cleanup levels in soil were DRO (1,660 mg/kg) and naphthalene (0.236 mg/kg). Contaminant concentrations above groundwater cleanup levels were DRO (1.810 micrograms per Liter) (ug/L), RRO

(3,290 ug/L), naphthalene (4.17 ug/L) and PCBs (1.11 ug/L). PCBs were not investigated in the original site work. Previous groundwater results did not indicate that petroleum hydrocarbons were present at concentrations above the regulatory cleanup levels.

ADEC Decision

New information indicates that the site may present an unacceptable risk due to the presence of PCBs and petroleum hydrocarbons in groundwater.

Additional soil and groundwater characterization will be necessary at this site. Cleanup actions may be necessary. The status in our records for this site will be changed to Active. This determination is in accordance with 18 Alaska Administrative Code (AAC) 75.380(d)(2).

According to the December 2021 Environmental Site Assessment report, the City and Borough of Wrangell is investigating the possible replacement or upgrade of portions of the power plant. During this process, the City & Borough of Wrangell will need to properly characterize and dispose of contaminated soil generated during construction.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 610 University Avenue, Fairbanks, Alaska 99709-3643, within 20 days after receiving the DEC's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 555 Cordova Street, Anchorage, Alaska 99501-2617, within 30 days after the date of issuance of this letter, or within 30 days after DEC issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

The project manager assigned to this project is Brandi Tolsma. Brandi can be reached at (907) 465-5378, or brandi.tolsma@alaska.gov. Brandi will be contacting you soon regarding this site.

If you have questions about this decision, please feel free to contact me at (907) 465-5229, or via email at evonne.reese@alaska.gov.

Sincerely,



Evonne Reese
IC Unit Project Manager

Enclosure: 2017 Cleanup Complete - ICs determination