



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: 1508.38.014

April 10, 2022

Via electronic mail only

Delta Western, Incorporated  
450 Alaskan way South, Suite 707  
Seattle, Washington 98104  
Attn: Christina Bentz and Amanda Dotton

Re: **Decision Document: Delta Western Tank Farm II Haines**  
Site status change to Active for further investigation

The Alaska Department of Environmental Conservation, Contaminated Site Program (DEC) has completed a review of the environmental record associated with the Delta Western Tank Farm II Haines, located at 12 Beach Road, Haines, Alaska. This review includes the details in DEC's 2014 Cleanup Complete Determination – Institutional Controls (ICs) determination information and the January 2024 Site Characterization Report for this property.

The information provided in the 2024 Site Characterization documented the investigation of the known areas of contamination. This assessment also documented contamination on areas on the property which have not been delineated and were not included in the 2014 Cleanup Complete Determination – ICs decision. For this reason, further characterization will be required and the site record for the Delta Western Tank Farm II Haines will be changed to Active status in the DEC's site record.

DEC Decision Document - 2014 Cleanup Complete - ICs letter summary-

Between 2007 - 2013 four interim removal actions of contaminated soil and two subsequent site investigations demonstrated that residual petroleum contamination remained at the site is in a discontinuous subsurface soil layer averaging between four and ten feet below the ground surface in the southeast quarter of the property in concentrations below human health based cleanup levels (Figure 1). An estimated volume of fifty cubic yards or less of the soil in this layer is in concentrations above the approved cleanup level of migration to groundwater. This portion of the property is subject to institutional controls to ensure the contamination remains undisturbed unless a cleanup effort is initiated with prior approval from DEC. The institutional control required that excavation and/or soil movement could not occur without prior approval from DEC (2014 Cleanup Complete Determination – ICs document enclosed).

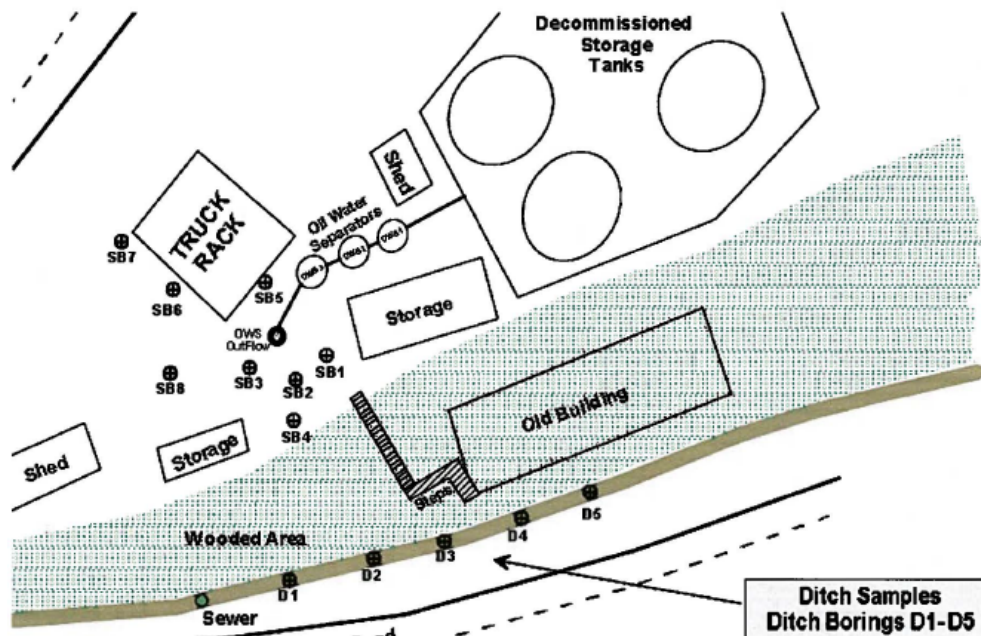


Figure 1 – 2012 Soil boring locations to define the extend of the subsurface contamination (diagram included in the 2014 CC-IC letter).

#### Details included in the 2023 site activities documentation

Following a DEC approved workplan, cleanup activities began in June with the goal of removing all the contaminated soil associated with the institutional control requirements. The cleanup activities included the removal of the buried fuel transfer piping near the footprint of the truck rack. Excavation followed between the truck rack and the oil water separator. This effort produced much more contaminated soil than expected. One hundred and twenty-eight cubic yards of contaminated soil were excavated, screened/sampled, placed into supersacks, and transported to Bicknell, Inc. in Juneau for treatment. An unknown volume of contaminated soil remains in the ground in this area of the property.

Water accumulated in the excavation pit from rain occurring during the excavation and from seeping sidewalls. This water was not believed to be groundwater based on the location of water accumulation and a known damaged water pipe. The water was put into drums, sampled for waste characterization, and stored prior to disposal.

To determine the extent of contamination, seven test pits were dug on the north and west side of the excavation. After sampling, excavated soil was placed back into the test pit. Due to the unexpected large volume of contaminated soil discovered, the cleanup activities were placed on hold to regroup and plan the next steps. The excavation was covered with an impermeable, reinforced liner.

Site characterization activities began in late July according to a DEC approved work plan. To further investigate the extend of the contaminated soil, additional test pits were advanced moving out from the previous excavation. Seven larger test pits were placed strategically across the site to assist in finding the contamination extent (Figure 2). After sampling, the soil was placed back into the test pit it came from. One hundred and thirty-nine locations were field screened which includes soils from the

excavation placed into supersacks. Sixty-three of the field screenings were from soils remaining on-site. Field screening documented areas of possible soil contamination in the northeast and southwest portions of the property in addition to the excavation area (Figure 2).

Four analytical samples, plus one duplicate, were collected and analyzed from the project site. Figure 2 shows the test pit locations of A, B, C, D, E, and F which span much of the property. Analytical samples were taken from Test pits A, F, G and from the stockpiled soil prior to placing into supersacks. Laboratory analyses were performed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), polycyclic aromatic hydrocarbons (PAHs), benzene, toluene, ethylbenzene, and xylenes (BTEX). Analytical results showed contaminant levels above the migration to groundwater cleanup level for at least one analyte in each test pit except for A.

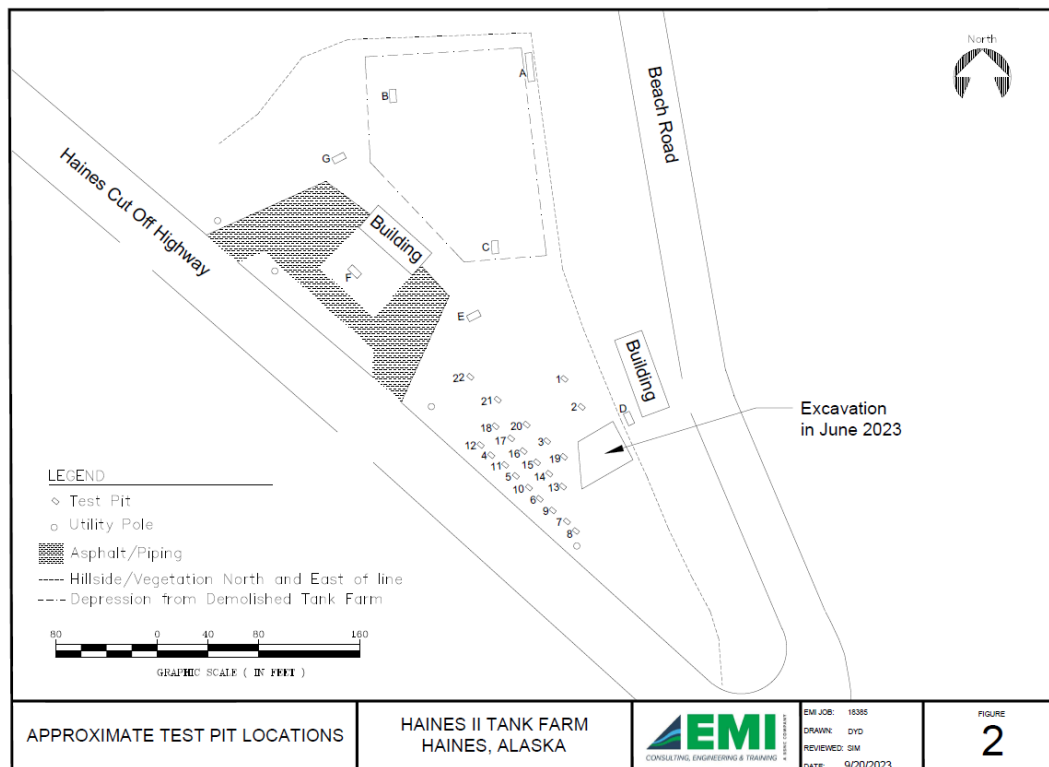


Figure 2 – 2023 test pit locations

## ADEC Decision

New information indicates that areas on the property not included in the 2014 Cleanup Complete – ICs decision site may present an unacceptable risk due to the presence of contamination in the soil. These areas were covered with the tank farm containment liner when the property operated as a tank farm. Now that all the tanks and their liner have been removed, the area needs to be characterized. The soil contamination on this property is not delineated, but not believed to have migrated off the property.

Cleanup actions, additional soil, and groundwater characterization will be necessary at this site. 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).

### 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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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 now assigned to this project is Rebekah Reams. Rebekah can be reached at (907) 465-5378, or [rebekah.reams@alaska.gov](mailto:rebekah.reams@alaska.gov). Rebekah 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](mailto:evonne.reese@alaska.gov).

Sincerely,



Evonne Reese  
IC Unit Project Manager

Enclosure: 2014 Cleanup Complete - ICs determination

cc: Rebekah Reams, DEC  
Hannah Deeney, EMI