DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

File: 400.38.030

July 12, 2002

Simon Mawson, MS, PE
Engineering Manager
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P.O. Box 110950
Anchorage, AK 99511-0950

Re: Contaminated Soil Management Plan

Dear Mr. Mawson:

Thank you for your July 1, 2002 letter and the enclosed contaminated soil management plan for the Paul Sharpe property in Nome, Alaska.

In summary, the City of Nome foreclosed on the Paul Sharpe property that is located in a residential neighborhood and excavated petroleum-contaminated soil from the site. The contaminated soil was transported and stored on liner at the city's Inert Waste Landfill awaiting a final disposal determination. The city requests permission to land spread the contaminated soil at the Inert Waste Landfill.

The Alaska Department of Environmental Conservation (ADEC) grants permission to spread about 46-cubic yards of contaminated soil from the Paul Sharpe property at the City of Nome's old Inert Waste landfill with the following conditions:

1) The City of Nome authorizes the disposal on its property and continues to control the public access to the facility.
2) The City of Nome concurs that seasonal groundwater in the near vicinity of the landfill area is either of insufficient quantity or quality to be used as a potable-drinking water source.
3) The contaminated soil is spread in such a manner that surface-water runoff on the site will not transport the contaminated soil.
4) Upon completion, written summary is provided of the derivation, management, sampling, and disposal of this soil to the ADEC's Fairbanks office. The final location of the spread soil is to be documented in either a site sketch or photographs that enable specific relocation at a later date, and included as part of the summary report.

The land spreading is authorized based on the elimination of the groundwater pathway. The disposal area is an industrial setting over permafrost with controlled access. Any groundwater in the vicinity of the old Inert Waste Landfill is seasonal in nature (thawing of active layer). It is not

considered potable due to natural background levels of arsenic, and possibly, other metal contamination. In addition, the area is the site of a historical honey-bucket lagoon, used for many years that was un-permitted and is now closed.

All constituents of the contaminated soil meet their strictest residential inhalation or ingestion cleanup standards. The contamination and cleanup standards are summarized as follows:

Constituent	Range of Values	Cleanup Standard
GRO	non-detect to 5.11 mg/kg	1400 mg/kg
DRO	44.7 to 2030 mg/kg	10,250 mg/kg
RRO	306 to 9410 mg/kg	10,000 mg/kg
Xylene	0.0747 to 0.1754 µg/kg	81 mg/kg
Fluoranthene	58.7 µg/kg	4100 mg/kg
Phenanthrene	118 µg/kg	none
Pyrene	94.4 µg/kg	3000 mg/kg

The Polycyclic Aromatic Hydrocarbon (PAH) results were taken from soil samples that exceeded the holding time by two weeks. The environmental laboratory that performed the PAH analysis believes the samples are still useful since the matrix was soil. Very few PAHs were detected and, when detected, the PAHs were at low levels. ADEC agrees that re-sampling for PAHs is not warranted at this time.

Under section 18 AAC 75.380(d)(1) of the cleanup rules, ADEC may require additional action if new information is discovered that leads ADEC to make a determination that the above cleanup action is not protective of human health, safety, welfare, or the environment.

If you have any questions, please contact Mr. Douglas Bauer.

Sincerely,

Douglas Bauer
Environmental Engineer Associate

Sincerely,

John Carnahan
Acting Section Manager
Fairbanks/Juneau Field Operations