

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2407.38.004

November 15, 2006

Dave Burdett
Manager, Facilities Services
77 Main Street
Winnipeg, Manitoba
Canada, R3C 2R1

Re: Alaska Commercial Store
Bethel, Alaska

Dear Mr. Burdett:

The Alaska Department of Environmental Conservation, Contaminated Sites Program, (ADEC) reviewed the Golder Associates *Annual Monitoring at the Bethel ACC Store* report dated July 15, 2005. Based on the information from this report and the administrative file, ADEC has determined that soil contamination remains at the site above the most stringent 18 AAC 75.341 soil cleanup levels but the nature and extent of the contamination does not pose an unacceptable risk to human health or the environment. This determination is subject to site specific conditions and, if complied with, will require no further remedial action at this time.

Please note the following information that was considered in making the determination on the environmental status of the site.

Site background

The Alaska Commercial (AC) Store is located in the community of Bethel, approximately 2,000 feet north of the Kuskokwim River and approximately 800 feet northeast of Dull Lake. It is a commercial facility used for retail sales. A small building (known as the 'generator building') is located behind the store and houses the boiler that provides heat to the store. There is also a diesel generator to provide electricity in emergency situations.

There are two 2,000 gallon above ground storage tanks that have leaked over time and subsequently impacted the soil and a thin layer of supra-permafrost groundwater at 3 to 5 feet below ground surface (bgs). In 1997, 1,000 gallons of diesel fuel reportedly spilled due to a malfunction in the fuel return line of the day tank in the generator building. Spill response efforts included recovery of approximately 200 gallons of fuel product, constructing dikes to prevent flow of product off-site,

and the removal of a culvert. There have been five groundwater monitoring wells installed at this site to determine groundwater quality conditions and if contamination is migrating. The AC Store also has a groundwater well on site approximately 200 feet deep and within 25 feet of the generator building. The well was previously used as the drinking water source for the AC Store but the store is now served by municipal water and sewer utilities.

The community receives its drinking water from a municipal source that draws water from the main aquifer about 200 feet below ground surface. The main aquifer is separated from the surface by a thick layer of permafrost. Both municipal wells are approximately 2,500 feet north of the AC Store.

The response actions have included excavation of 50 cubic yards of contaminated soil near the generator building. The soil was stockpiled on site in 1998 and expected to naturally attenuate over time. The soil was sampled in 2006 with the diesel range organics (DRO) concentrations below the cleanup level of 1,400 milligrams/kilogram (mg/kg) DRO established for this site. The soil stockpile was then land spread on-site in September 2006.

The soil samples from the limits of the excavation detected up to 5,000 mg/kg DRO but further removal was not considered practicable due to concerns for the integrity of the building's foundation.

The groundwater monitoring results also indicated the groundwater was contaminated near the generator shed and south of the AC Store towards Dull Lake. The monitor results indicate DRO are present above cleanup levels but there appears to be a stable or decreasing trend since 1997.

Pathways Evaluated

The exposure pathways evaluated at the site include: ingestion of soil and water, and inhalation of indoor and outdoor air. The migration to ground and surface water pathways were also evaluated.

The contamination remaining on site does not exceed the 18 AAC 75 alternative cleanup levels for soil established for gasoline range organics (GRO) and DRO at this site in an August 10, 2000 letter from ADEC staff Jim Frechione.

The migration to groundwater (supra permafrost) pathway is complete but monitoring data over nine years has shown a decreasing trend in contamination levels. Only DRO remains above ADEC cleanup levels and monitoring indicates a decreasing trend. In addition, the supra permafrost groundwater is not used as a drinking water source. The drinking water in Bethel is located beneath the permafrost layer (oftentimes several hundred feet in depth) and not at risk from the remaining contamination.

Cleanup Levels

The soil cleanup levels established for this site are 18 AAC 75.341 Method 2, tables B1 and B2 with the exception of GRO and DRO. Alternative soil cleanup levels of 1,400 mg/kg GRO and DRO were established for this site in an August 10, 2000 letter from ADEC staff Jim Frechione.

The groundwater cleanup levels established for this site are the 18 AAC 75.345 Table C levels.

ADEC Decision

Based on the information provided to date, ADEC has determined that the cleanup actions employed at the AC Store in Bethel have been effective in removing the majority of the contamination at the site. The contamination has been removed to the extent practicable with residual contamination remaining beneath the generator building. The nature and extent of the remaining contamination does not pose an unacceptable risk to human health or the environment provided site specific conditions and/or controls are attached to the property. As a result of this determination, ADEC will require no further remedial action subject to the following conditions:

1. An Institutional Control will be added to the ADEC Contaminated Sites Database identifying the nature and extent of contamination remaining on site.
2. In accordance with 18 AAC 75.370(b), ADEC approval must be obtained prior to removal and/or disposal of soil or groundwater from this site.
3. ADEC must be notified (and approve) the installation of any groundwater wells at this site.
4. A groundwater monitoring plan shall be prepared that includes the monitoring of MW-1, MW-2 and MW-4 annually during the summer season in 2007 and 2008. Samples will be analyzed for DRO using the AK 102 method. In addition, MW-3 and MW-5 shall be decommissioned in accordance with ADEC procedures.
5. Sample the former drinking water wells prior to decommissioning it using EPA Method 524.2.

Site closure (without conditions) can be achieved when soil and groundwater samples indicate the most stringent 18 AAC 75.341 soil cleanup levels and the 18 AAC 75.345 Table C groundwater levels are achieved.

In accordance with 18 AAC 75.380(d)(2) ADEC may require additional site assessment, monitoring, remediation, and/or other necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

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, PO Box 111800, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99811-1800, within 15 days of the decision.

Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, PO Box 111800, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99811-1800, within 30 days of the decision. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have any questions, please contact Shannon Oelkers by phone at 907-451-2104 or via e-mail at Shannon_Oelkers@dec.state.ak.us.

Sincerely,



Shannon Oelkers
Environmental Program Specialist



Jim Frechione
Environmental Program Manager

cc: Mike Griffin