

**DIVISION OF SPILL PREVENTION & RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM
555 CORDOVA STREET
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November 12, 1997

Carl H. Harmon
Chugach Electric Association
PO Box 196300
Anchorage, Alaska 99519-6300

RE: 1200 Ocean Dock Road
ADEC File No. CS 100.166

Dear Mr. Harmon:

The Alaska Department of Environmental Conservation, Contaminated Sites Remediation Program, (ADEC) has received correspondence dated October 16, 1997 from Paul Beveridge of Heller Ehrman White & McAuliffe regarding the above referenced property. That letter documented the August 14 meeting between ADEC, Chugach Electric Association (CEA) and the Alaska Railroad Corporation (ARRC) and provided additional information regarding the request for no further action related to surface soils at the site. It was generally agreed that CEA=s efforts to remediate soil contamination at the 1200 Ocean Dock property would be reviewed in accordance with current ADEC policy guidance and alternative cleanup standards proposed in the December, 1996 draft 18 AAC 75 regulations.

The March, 1996 Environmental Site Assessment and Clean-Up Report prepared by CEA and Environmental Management Inc. stated that approximately 690 tons of contaminated soil (plus 23 additional tons from the floor drain areas) was excavated and removed for treatment. The confirmation sampling results provided in the report and the letter indicate that soil cleanup levels were based on alternative cleanup levels (ACL=s) approved for the adjacent MAPCO Alaska site. MAPCO Alaska=s leachability studies were conducted by Shannon & Wilson to determine the alternative cleanup levels at which any remaining contamination would not leach into the area groundwater. The cleanup levels established for the site were: gasoline range organics (GRO) at 530 parts per million (ppm); diesel range organics (DRO) at 900 ppm; and residual range organics (RRO) at 2,670 ppm. Any soils that exceeded these concentrations were to be excavated and treated.

As stated in previous correspondence to you regarding the assessment and corrective actions employed at this site, it was inappropriate to initiate your actions without the prior review and

approval of work plans by ADEC. ACL=s are established using site specific soil and groundwater information and are usually applicable to a specific site or area. In this case, CEA used the ACL=s from the MAPCO Alaska site on the basis that site conditions were similar enough to warrant the same leachability assessment.

ADEC recognizes your company=s soil cleanup efforts to date (more than 700 tons of soil removed for treatment) and believes that a major source of contamination in this area has been eliminated as a result. In addition, the May, 1992 Phase II Site Assessment that was used to determine ACL=s for the MAPCO site was reviewed and is determined to be sufficient to warrant applying the same ACL=s for the CEA site. Therefore, the remedial action employed at this site by CEA in regards to soil (not groundwater) remediation is considered adequate and will require no further corrective action.

It should be noted that the approval of ACL=s at this site is conditional on the property being subject to institutional controls for risk assessment purposes. The land use in this area is industrial in nature which should be applied to the subject lot. Also, groundwater at the site should not be considered for drinking water purposes until adequate measures are taken to insure the water quality meets state drinking water standards. Since these conditions are applicable to the landowner as institutional controls, a copy of this letter will be forwarded to the Alaska Railroad Corporation for their information. In the event the land owner does not agree with the institutional controls, additional corrective action may be required. Also, please be aware that if additional site information indicates contamination at the site poses a risk to the public=s health and/or the environment then ADEC reserves the right to require a stricter cleanup standard(s) than those authorized in this letter.

The subject property is located in an area (the Petroleum Users Group) that is being considered for an area wide risk assessment. If cleanup standards are established by such a risk assessment that do not conform with those approved under the leachability assessment, then the cleanup levels for this site may be amended to reflect consistency throughout the area. This decision would not affect the cleanup levels established for this particular project but may impact future users of the property in regards to their environmental responsibilities. Also, please note that this decision does not include any corrective action that may be applicable to groundwater contamination and the issue of groundwater remediation will continue to be addressed in accordance with the Petroleum Users Group. CEA and/or ARRC may still be responsible for any groundwater contamination resulting from their use of this site.

In conclusion, ADEC has determined that ACL=s for soils associated with petroleum hydrocarbon contamination at the 1200 Ocean Dock property are established based on the information above. The cleanup levels established for this site are based on a May 1992 leachability assessment prepared for the adjoining property and conditional upon institutional controls being attached to the use of the site. ADEC reserves the right to amend the levels to a more stringent standard if future information indicates the site contamination poses a risk to the public=s health of the environment.

Please contact Jim Frechione at 269-7658 if you have any questions or comments.

Sincerely,

Lynn Tomich Kent
Program Manager
Contaminated Sites Remediation Program

cc: Susan Schrader, ARRC
Paul Beveridge, Heller Ehrman White & McAuliffe
Jim Frechione, ADEC