

# STATE OF ALASKA

TONY KNOWLES, GOVERNOR

## DEPT. OF ENVIRONMENTAL CONSERVATION

### DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES REMEDIATION PROGRAM

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June 1, 2001

Sally Schlichting  
Carson Dorn, Inc.  
712 West 12<sup>th</sup> Street  
Juneau, AK 99801

RE: Natzuhini Logging Camp Voluntary Cleanup, Prince of Wales Island, Alaska  
Approval of Final Cleanup Report/No Further Remedial Action Planned

Dear Sally:

The Alaska Department of Environmental Conservation (ADEC) has completed review of sample results for the *Corrective Action Final Report for Natzuhini Camp* submitted to the Department in April 2001.

The Natzuhini Camp is a small logging camp owned by Sealaska Corporation, and located off the Hydaburg Road on Prince of Wales Island. Historical documentation shows this camp to have been used by various logging contractors for the past 20 years. The most recent contractor, Phoenix Logging, has agreed with Sealaska to address incidental contamination related to fueling and maintenance practices on the facility. Prior to entry into the Voluntary Cleanup Program (VCP), an August 1999 site characterization by Smith Bayliss LeResche identified three areas of concern: the maintenance shop, former generator shed, and the former truck parking area. Identified contaminants of concern were mostly diesel and residual range organics (DRO, RRO), with chlorinated and Benzene Toluene Ethylbenzene Xylene (BTEX) compounds identified at low levels. Gasoline Range Organics (GRO) and Polyaromatic Hydrocarbon (PAH) contamination were tested for and eliminated as compounds of concern.

Notification of acceptance into the Voluntary Cleanup Program and permission to proceed with cleanup work was issued on December 11, 2000. Cleanup standards accepted for this site were Method Two, Migration to Groundwater pathway. The resulting cleanup levels for DRO is 230 ppm, RRO 8,300 ppm plus the applicable Table B1 Soil Cleanup Levels for chlorinated and BTEX compounds.

Excavation of soil began in January 2001, ending with a screening and stockpiling effort in February 2001. Approximately 415 cubic yards of soil was excavated and screened down to 90 cubic yards of soil. Screened soil was placed in a lined and bermed biocell constructed on the property, this biocell is a standard measure and approved by the Department. Please ensure the soil is maintained, sampled and follows applicable Department requirements for cell biocells discussed on page 28 of the VCP Manual. As indicated in the report, you plan to sample yearly, with a tentative length of treatment of two years.

A summary of confirmational sampling from the 2001 removal actions follows:

#### **Maintenance Shop:**

Sampling included DRO, RRO and VOC's in soil and groundwater. For soils, RRO cleanup levels were met with DRO exceedences up to 1,300 ppm where excavation had to halt due to buildings. An estimated 25 cubic yards of DRO contaminated soil remains. For VOC's in soil, Methylene chloride was detected. However, lab QA/QC records consistently show detections in the laboratory blank, indicating cross-contamination by this common laboratory solvent, a common problem at these detection levels, which your

laboratory noted. Supporting this conclusion is the fact Methylene chloride was not detected during the original assessment and is the only compound detected of the 68 VOC's analyzed for. Groundwater samples for DRO, RRO and VOC's met all applicable cleanup levels.

**Former Generator Shed/Parking Area:**

Sampling again included DRO, RRO and VOC's in soil and groundwater. For soils, RRO cleanup levels were met with DRO exceedences up to 680 ppm where excavation had to halt due to buildings. An estimated 11 cubic yards of DRO contaminated soil remains. For VOC's in soil, Methylene chloride was detected. Again, these detections result from laboratory cross-contamination, as indicated by the laboratory. Groundwater samples for DRO, RRO and VOC's met all applicable cleanup levels.

**Determination**

Sealaska Corporation has noted this site continues to be used as a log camp and all structures will remain standing. Cleanup of the remaining soil will necessitate demolition of these structures, an impractical solution for an operating facility. Since remaining contamination is low-risk and groundwater is not impacted above Table C standards, the Department concludes cleanup has occurred to the maximum extent practical (18 AAC 75.325 (f)) and concludes that No Further Remedial Action is Planned. Once the camp is closed and structures are demolished in the future, Sealaska will be required to address the remaining soil. Sealaska has been contacted and agrees with this conclusion.

In accordance with 18 AAC 75.380(d)(1), additional investigation and cleanup may be required if new information is discovered which leads DEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

If you are in disagreement with this decision, you may seek an adjudicatory hearing under 18 AAC 15.200 - 18 AAC 15.920 within 30 days of the mailing of this decision document.

Please call Michael Jaynes, the project manager for this site, at (907) 465-5358 if you have any questions regarding this determination.

Sincerely,



Michael Jaynes  
Project Manager

Cc: Les Loonie, Phoenix Logging  
Russell Dick, Sealaska Corporation