

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

555 Cordova Street
Anchorage, AK 99501-2617
Phone: (907) 269-7503
Fax: (907) 269-7649
<http://www.dec.state.ak.us/>

File #300.38.227

June 19, 2006

Kelly Sperbeck
Schlumberger Technology Corp.
Pouch 340069
Prudhoe Bay, AK
99734

RE: REW Pad
Record of Decision

Dear Ms. Sperbeck,

The Department of Environmental Conservation, Contaminated Sites Program (ADEC) has reviewed the letter report *Soil Sampling Results for the Schlumberger Technology Corporation-REW Pad, July 1 2004*.

Based on the information provided to date, ADEC has determined that the Schlumberger REW Pad- AST Spills site shall be conditionally closed because the hazardous substance contamination does not pose an unacceptable risk to human health or the environment.

However, the department has the following comments, and/or concerns regarding this investigation as follows.

1. In accordance with 18 AAC 75.355(b): "A responsible party.....shall ensure that the collection, interpretation, and reporting of data, and the required sampling and analysis is conducted or supervised by a qualified, impartial third party". The data presented by Schlumberger was not reviewed or presented by an impartial third party as required in the above referenced regulations.
2. In accordance with 18 AAC 75.355(e): "Laboratory analysis under the site cleanup rules must be performed by a laboratory approved by the department..." The lab used in this investigation, Northern Testing Labs, is not approved by the department. If the analysis were subcontracted to another lab, that information is not documented in the report.
3. Successful removal of contaminated soil can only be confirmed by the collection of confirmation samples from the bottom and sides of each excavated area. Screening by "visual and olfactory inspection" as stated in the report is not acceptable for determining the extent of contaminated soil.

4. Due to the higher concentrations of gasoline range organics in arctic grade diesel fuel, soil samples should be analyzed for benzene, toluene, ethylbenzene, and xylenes, not just DRO.
5. The report does not contain a figure showing the location, depth, and extent of excavation, nor is there a figure showing the location of any surface water bodies near the pad in accordance with 18 AAC 75.335(b)(2)(F) and 18 AAC 75.335(b)(2)(I)

Schlumberger must conduct all future investigations in accordance with 18 AAC 75 and any other applicable federal and/or state regulations. Please note that future soil and groundwater laboratory samples collected at any contaminated site are subject to the requirements of ADEC's new Laboratory Quality Assurance (QA) Policy. A copy of the QA Technical Memo that explains these requirements can be found at this link:
http://www.dec.state.ak.us/spar/csp/guidance/tm_lab_qa.pdf.

Introduction

Site name and location:

Schlumberger Technology Corporation-REW Pad
Prudhoe Bay, Alaska

Name and mailing address of contact person:

Kelly Sperbeck
Schlumberger Technology Corp.
Pouch 340069
Prudhoe Bay, AK
99734

Database Record Key and CS file number:

ADEC Reckey # 2001360118401
CS file # 300.38.227

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 70

ADEC Decision

Based on the limited data presented by Schlumberger, it appears that the highest concentrations of diesel contamination have been removed and thermally treated. Any remaining contamination on the pad is likely to be below ADEC's Maximum Allowable Concentrations established in 18 AAC 75.345 Table B2 for the Arctic Zone, and does not appear to pose an unacceptable risk to human health or the environment at this time.

This decision will be noted as "Conditional Closure" on the ADEC database and is subject to the following conditions:

1. A Notice of Residual Contamination will be recorded on the ADEC database to document that there are areas on the pad where hazardous substance contamination

may remain above the most stringent ADEC cleanup levels

2. Any proposal to transport soil or porewater off site requires ADEC approval in accordance with 18 AAC 75.325(i).
3. Visual monitoring of surface water near the pad shall be conducted during the summer of 2006, with the results communicated to ADEC either verbally or in writing. Based on the results of 2006 monitoring, additional monitoring events or corrective action may be required.

This determination is based on information presented to date but does not preclude the Department from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Site closure (without conditions) can be achieved when soil sampling confirms that all soil meets the most stringent 18 AAC 75.341 Method One, Table A2 or Method Two migration to groundwater, Under 40 Inch Zone cleanup levels

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, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have questions about this closure decision, please contact William O'Connell at (907) 269-3057.

Sincerely,



Linda Nuechterlein
Environmental Manager