STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

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March 3, 2005

File #: 220.26.004

Mr. Bill Heubner
United States Dept. of the Interior
National Park Service, Alaska Region
240 West 5th Avenue
Anchorage, AK 99501

RE: No Further Remedial Action Planned -
Toklat Camp site, Denali National Park and Preserve, Alaska; reckey: 2000310021201

Dear Mr. Heubner:

The Alaska Department of Environmental Conservation (department) has received and reviewed the *September 2003 Groundwater Monitoring Report* for the Toklat Camp site in the Denali National Park and Preserve prepared by HartCrowser and dated November 2004.

It was noted during the review of the *September 2003 Groundwater Monitoring Report* that the department has not approved cleanup levels for this site. In the past, the department's soil cleanup levels of 18 Alaska Administrative Code (AAC) 75.341, Tables B1 and B2, for the under 40 inches of precipitation climate zone most stringent risk-based exposure pathway, and the groundwater cleanup levels of 18 AAC 75.345, Table C have been used in National Park Service reports for this site as cleanup levels. The department hereby approves these levels, specifically, in soil: benzene of 0.02 milligrams per kilogram (mg/kg); ethylbenzene of 5.5 mg/kg; gasoline range organics of 300 mg/kg, and diesel-range organics of 250 mg/kg; and in groundwater: benzene of 0.005 milligrams per liter (mg/l), gasoline-range organics of 1.3 mg/l, and diesel-range organics of 1.5 mg/l, in accordance with 18 AAC 78.600-620.

The site is located at Mile 54 Denali Park Road in an area used for seasonal employee housing. The sources of contamination were two regulated 4000-gallon underground storage tanks (USTs). The gasoline and diesel USTs supplied fuel to a dispenser island via underground piping. In July 2000, the USTs were closed and a site assessment was conducted. At that time, both tanks, two dispensers, and the piping were removed. Approximately 137 tons of contaminated soil were excavated and transported to OIT, Inc. in North Pole, Alaska for thermal treatment. Contaminated soil within the UST area was excavated down to the depth 9 feet below ground surface (bgs) where the groundwater table was found. Groundwater was found at 3 feet

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bgs in the piping and dispenser areas. Confirmation samples were collected in the zone of groundwater fluctuation. Concentrations of benzene, gasoline-range organics, and diesel-range organics exceeding their respective soil cleanup levels were found to have been left in place. These soils were not able to be removed due to the presence of groundwater and the presence of a storage shed building on the western side of the UST excavation area. In August 2001, six (6) soil borings were advanced to delineate the area of contamination, and were completed as groundwater monitoring wells, each to a depth of 7 feet bgs. At this time, 22 test pits were also advanced. The highest levels of soil contamination found were benzene at 0.2 milligrams per kilogram (mg/kg), ethylbenzene at 21.4 mg/kg, gasoline-range organics at 1070 mg/kg, and diesel-range organics at 6720 mg/kg.

In June 2002, three (3) additional groundwater monitoring wells were installed to depths of 7-8.5 feet bgs to further define groundwater impacts. It was noted during the installation of these wells that groundwater was found at 7 feet bgs during drilling and rose to approximately 3 feet bgs following installation of the wells. Seven (7) of these nine (9) wells were included in semi-annual monitoring events conducted since the time of installation until September 2004. Two (2) wells, MW-2 and MW-7, were removed from the sampling schedule as the sample results showed non-detect for all contaminants of concern. Semi-annual monitoring has consisted of analysis for gasoline-range organics, diesel-range organics, benzene, toluene, ethylbenzene, and xylenes. Only one well, MW-6, which was placed in the area of highest remaining contamination, showed concentrations of contaminants exceeding the groundwater cleanup levels. The highest concentrations found in MW-6 over time occurred just following installation in August 2001 with sample results showing benzene at 0.05 milligrams per liter (mg/l), gasoline-range organics at 1.84 mg/l, and diesel-range organics at 8.4 mg/l. Sample results for MW-6 in the six (6) subsequent monitoring events show exceedances of the cleanup levels just once, in June 2003, with concentrations of non-detect in the September 2004 sampling event. Sample results for all wells were below the respective cleanup levels for the past three (3) semi-annual monitoring events.

The department has determined that the cleanup at the Toklat Camp site has been completed to the extent feasible. Although soil is likely present with concentrations of benzene, ethylbenzene, gasoline-range organics and diesel-range organics that exceed their respective cleanup levels, leaching of contamination is not occurring to an extent that contaminant concentrations are detected which exceed the groundwater cleanup levels. Groundwater at the site is used for drinking water, however the installation of a drinking water well downgradient from this site is unlikely as water is already provided by a 75-80 foot deep well located at least 500 feet upgradient to the south. Furthermore, the presence of two downgradient features, the Toklat River, 300 feet to the northeast, and the septic system drainfield, 200 feet to the north, also greatly reduce the likelihood for future downgradient well development. Groundwater at the site has been shown to meet the applicable cleanup levels.

Based upon past soil samples, soil is likely present at the site that contains contaminants at levels above the most stringent cleanup levels in 18 AAC 75.341, Tables B1 and B2. Prior notification to the department pursuant to 18 AAC 75.325(i) for disposal, movement, or relocation of this soil off-site is required. The National Park Service has agreed to place a notice on its Geographic Information Systems (GIS) land management tracking database as to the location of the residual

contamination exceeding these default levels. Please note that if in the future additional contamination is found to be present that may pose an unacceptable risk to human health, safety, welfare or the environment, it must be reported to the department and additional cleanup may be required.

The department will update the status of this site in our contaminated sites database to "no-further remedial action planned". If you have any questions about this site, please do not hesitate to contact me at 269-7545 or Anne Marie Palmieri, of my staff, at 766-3184.

Sincerely,

John Halverson, for
Jennifer Roberts
Section Manager

cc: Tammy Scholten, NPS (Post Office Box 9, Denali, Alaska 99755)
Nino Muniz, HartCrowser (2550 Denali Street, Suite 705, Anchorage, Alaska 99503-2737)
Anne Marie Palmieri, DEC