STATE OF ALASKA

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

SARAH PALIN, GOVERNOR

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File No. 1504.38.001

April 23, 2009

John Bolling City Administrator City of Craig P.O. Box 725 Craig, AK 99921

Re:

Redevelopment Clearance for Proposed Lot 1

Craig Bulk Plant/Wards Cove Packing - cannery manager's residence (Proposed Lot 1)

Database ID Number 300

Dear Mr. Bolling:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the Streamlined Cleanup Program site cleanup report submitted by the City of Craig and Menzies Engineering Group. This report is in regards to contamination resulting from an above ground home heating oil tank located at the former cannery manager's residence (Proposed Lot 1). In 2005 ADEC issued a conditional closure determination for multiple contaminant sources on this site, but the existence of contamination under the manager's residence was unknown at the time. As part of the redevelopment of the property, the residence building was moved which revealed the contamination under the building. This letter presents ADEC's decision regarding the redevelopment of Proposed Lot 1 under 18 AAC 75.380.

(A complete site history and investigation chronology can be found on the ADEC issued No Further Remedial Action Determination letter dated November 2, 2005.)

Site investigation and cleanup

Soil

Excavation of the contaminated soil at this site was completed on February 25–27, 2009. All soil determined to be contaminated was removed from the ground except for soil on the north side of the excavation that continued past the Proposed Lot 1 property boundary.

Three confirmation soil samples plus two duplicate samples were taken from the excavation walls. Lab analyses were conducted for diesel range organics (DRO), gasoline range organics (GRO), residual range organics (RRO), benzene, toluene, ethylbenzene, total xylenes, and a variety of polycyclic aromatic hydrocarbons (PAHs). All samples analyzed were below the established cleanup levels for this site.

Approximately 450 cubic yards of contaminated soil were removed and divided between two stockpiles. One stockpile is located onsite and the other is located at a City owned parcel along Port St. Nicholas Road. The stockpiles have been securely covered and are stored on level ground surfaces. Stockpiles will be tilled and raked on a regular basis to encourage natural biodegradation of the soil. Once cleanup levels are achieved, the soil will be disposed of properly.

Groundwater

Groundwater was found at approximately four feet below the ground surface at the time of investigation. Groundwater seepage into the excavation pit occurred on a daily basis while the excavation pit was open and required pumping out each morning before further excavation could be conducted. During this remedial site work, groundwater was not sampled to determine compliance with 18 AAC 75,345 groundwater cleanup levels. Under 18 AAC 75.350, ADEC determined in 2005 that groundwater at the site:

- 1. is not currently used for a private or public drinking water source, is not within the zone of contribution of an active private or public drinking water system, and is not within a recharge area for a private or public drinking water well, a wellhead protection area, or a sole source aquifer;
- 2. is not a reasonably expected future source of drinking water, and;
- 3. will not be transported to any groundwater source that is a current or reasonably expected potential future source of drinking water.

Determination

The contamination at the Proposed Lot 1 property has been adequately addressed and is cleared for redevelopment.

The issue of the remaining contamination north of Proposed Lot 1 will need to be addressed and may require further characterization and remediation, therefore the site status will be changed to *Open* on our contaminated sites database. In particular, it may be necessary to establish one or more downgradient "point of compliance" monitoring wells to ensure surface water quality standards are met prior to groundwater entering Klawock Inlet (Bucareli Bay).

Nutrients should be added initially and the two stockpiles should be tilled several times this spring and summer to encourage natural biodegradation. The onsite stockpile must meet site specific cleanup levels established for the 2005 cleanup project if the soil is placed back in the same vicinity. Cleanup levels for unrestricted disposal, which includes the soil stockpiled at the Port Saint Nicholas site, are 18 AAC 75.341, Table B2 migration to groundwater. Screening level sampling during the summer will help determine when the stockpiles have likely met the applicable cleanup levels; only the final confirmation sampling plan must be reviewed and approved by ADEC.

As a reminder, the institutional controls regarding groundwater usage restrictions are still in place and will apply to any new structures built on this lot.

Appeal

City of Craig

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 - .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 of the decision date. 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 of the decision date. The right to appeal is waived if a hearing is not requested within 30 days.

Sincerely,

Evonne Reese Project Manager