

# STATE OF ALASKA

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

**SEAN PARNELL, GOVERNOR**

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File: 2454.38.004  
Certified Return Receipt  
Article No: 7007 3020 0000 1948 3990

September 16, 2009

Gary Baldwin, Superintendent  
Lower Kuskokwim School District  
P.O. Box 305  
Bethel, AK 99559

Re: Record of Decision (ROD); Former Kongiganak School Tank Farm  
Cleanup Complete - Institutional Controls (ICs) Determination

Dear Mr. Baldwin:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Former Kongiganak School Tank Farm located in Kongiganak, AK. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required as long as the site is in compliance with established institutional controls.

This decision is based on the administrative record for the Former Kongiganak School Tank Farm, which is located in the offices of the ADEC in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Cleanup Complete with ICs determination.

## **Introduction**

### Site Name and Location:

Former Kongiganak School Tank Farm  
125 feet north of the Dick R Kiunya Memorial School  
Kongiganak, Alaska 99545

### Name and Mailing Address of Contact Party:

Gary Baldwin, Superintendent  
Lower Kuskokwim School District  
P.O. Box 305  
Bethel, AK 99559

Database Record Key and File Number:

ADEC Reckey: 2003250112002

File: 2454.38.004

Hazard ID: 4015

Regulatory authority under which the site is being cleaned up:

18 AAC 75

**Background**

This site has been impacted by leaking pipes from the former Kongiganak School Tank Farm's ten vertical above ground storage tanks (ASTs) that were decommissioned in April 2003. Soil samples collected at this site have been tested for: gasoline range organics (GRO); diesel range organics (DRO); benzene, toluene, ethylbenzene, and xylenes (BTEX); volatile organic compounds (VOC) and polycyclic aromatic hydrocarbons (PAH).

**Site Characterization Activities**

Following the removal of the ASTs in 2003, a site characterization that included the advancement of ten test pits, was conducted in June 2009. DRO exceeded the cleanup levels in soil samples from three of the ten test pits and was detected up to 2,790 mg/kg. Benzene was found in one sample at 0.0866 mg/kg, and toluene was found up to 10.0 mg/kg. The toluene exceedance was attributed to biogenic interference. GRO, VOCs and PAHs were not detected in the ten test pits above the most stringent Method Two, Migration to Groundwater levels established in 18 AAC 75.341.

Groundwater samples were not collected because groundwater was not encountered to a depth of 12 feet below ground surface (bgs) using hand-driven temporary well points. Groundwater is not used as a source for drinking water in this community.

**Contaminants of Concern**

- Diesel Range Organics (DRO)
- Benzene

**Cleanup Levels**

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, *Under 40 inch Zone, Migration to Groundwater*.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
• Diesel Range Organics	250
• Benzene	0.025

**Pathway Evaluation**

The exposure pathways for human health that were evaluated include the following: ingestion and direct contact of soil and groundwater; inhalation of vapors; and dermal contact with soil. The inhalation and ingestion exposure risk are acceptable as the remaining concentrations are below Method Two inhalation and ingestion health-based cleanup levels. The dermal contact

pathway may be complete; however, the contamination remaining at the site is below the surface and is not available to receptors.

Groundwater at the site is not used as a drinking water source, and there are no potable water wells in the Kongiganak community. Drinking water is piped from Contractor Lake which is located approximately one mile north of town, and none of the homes are plumbed. To obtain drinking water, the residents haul their water, collect rainwater, or melt snow. Therefore, the ingestion of groundwater pathway is considered incomplete.

The exposure pathway analysis above was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete.

### **ADEC Decision**

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete - ICs determination subject to the following:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the LKSD shall report to ADEC every five years to document land use, or report as soon as LKSD becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to [DEC.ICUnit@alaska.gov](mailto:DEC.ICUnit@alaska.gov).**
2. Future installation of groundwater wells will require prior approval from ADEC.
3. Any proposal to transport soil off site requires ADEC approval in accordance with 18 AAC 75.325(i). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, then the Institutional Controls will be terminated.

This determination is in accordance with 18 AAC 75.380(d) and does not preclude ADEC 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.

### **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.

Please sign and return *Attachment A* to ADEC within 30 days of receipt of this letter. If you have questions about this closure decision, please contact the ADEC project manager, Pam Clemens at (907) 269-7551 or via email at Pam.Clemens@Alaska.gov.

Recommended by,



Pam Clemens  
Environmental Specialist

Approved by,



Linda Nuechterlein  
Environmental Manager

Attachment A: Cleanup Complete-ICs Agreement Signature Page  
Attachment B: Site Figure

Cc: Bill Murdock, LKSD  
Kimberly Andrews, DEED

**Attachment A: Cleanup Complete-ICs Agreement and Signature Page\***

The Lower Kuskokwim School District (LKSD) agrees to the terms of this Cleanup Complete with ICs determination as stated in this Record of Decision (ROD) document dated September 16, 2009 for the Former Kongiganak School Tank Farm, Hazard ID: 4015. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 18 AAC 75.380(d).



Signature of Authorized Representative, Title  
Gary Baldwin, Superintendent, LKSD

GARY BALDWIN, SUPERINTENDENT

Printed Name of Authorized Representative, Title  
Gary Baldwin, Superintendent, LKSD

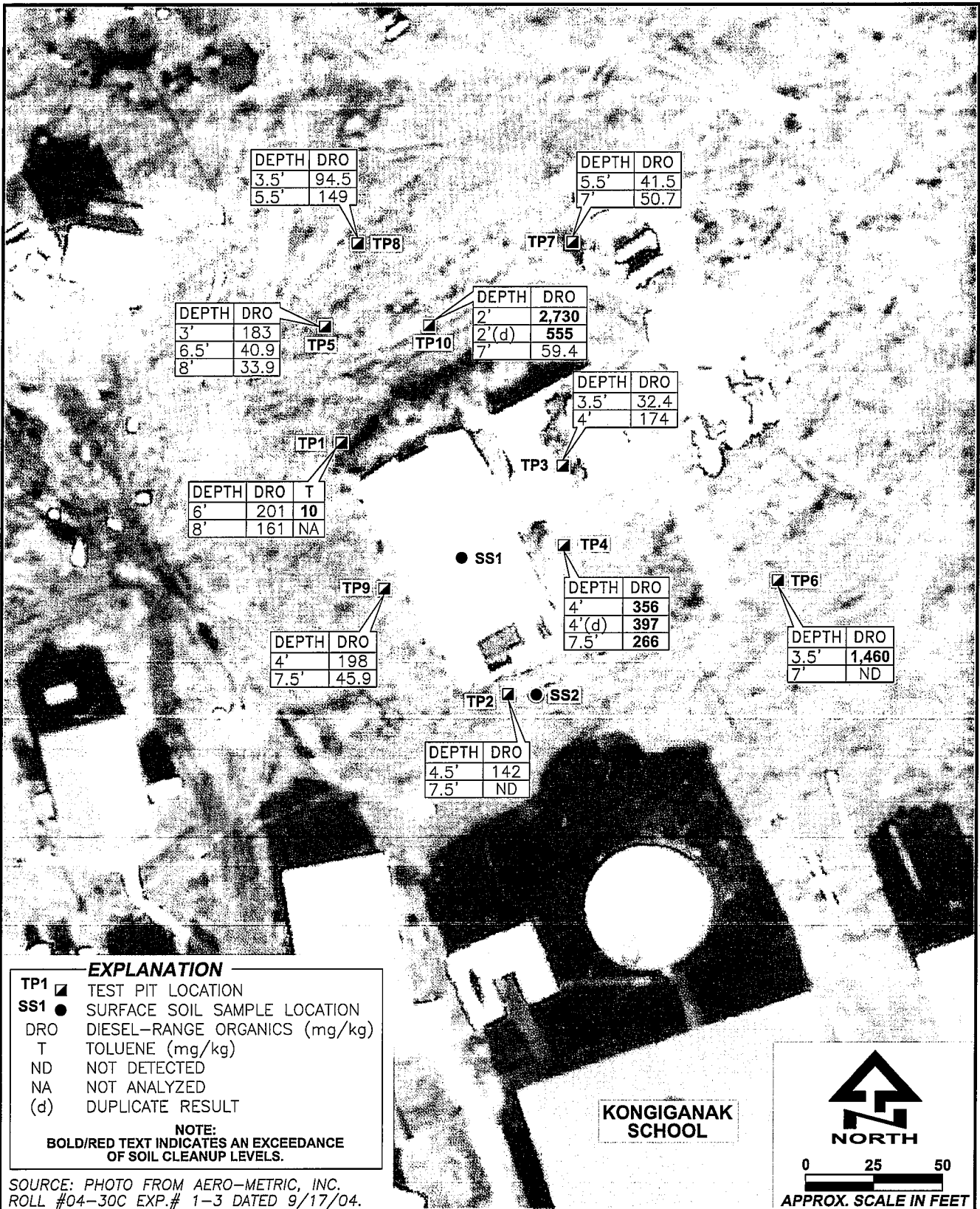
Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the ADEC project manager, Pam Clemens, at the address on this correspondence within 30 days of receipt of this letter.

\*Attention ADEC Administration Staff: Please do not file this form until the ADEC project manager has updated the database.

**Attachment B: Site Figure (attached)**

PATH: V:\Project Drawings\ADEC\Kongiganak\09 Kong RPT FILE: 14-157-KON-RPT-F3.DWG PLOTTED: 6/25/09.



**EXPLANATION**

TP1 TEST PIT LOCATION

SS1 SURFACE SOIL SAMPLE LOCATION

DRO DIESEL-RANGE ORGANICS (mg/kg)

T TOLUENE (mg/kg)

ND NOT DETECTED

NA NOT ANALYZED

(d) DUPLICATE RESULT

**NOTE:**  
BOLD/RED TEXT INDICATES AN EXCEEDANCE OF SOIL CLEANUP LEVELS.

SOURCE: PHOTO FROM AERO-METRIC, INC. ROLL #04-30C EXP.# 1-3 DATED 9/17/04.



DATE: JUNE 2009

CHKD: A.W.

DRAWN: C.E.H.

PROJ. No.: 14-157

825 W. 8th Ave., Anchorage, AK 99501, (907) 258-4880

**SURFACE SOIL SAMPLE AND TEST PIT LOCATIONS WITH RESULTS**

FORMER KONGIGANAK SCHOOL TANK FARM SITE CHARACTERIZATION  
Kongiganak, Alaska

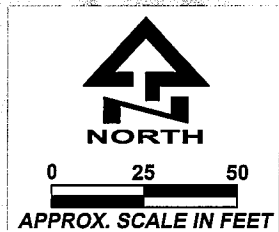


Figure from Oasis Site Characterization Final Report August 2009