STATE OF ALASKA

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

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November 16, 2009

Ms. Mary Edenshaw
Klawock Heenya Corporation
P.O. Box 129
Klawock, AK 99925

Re: Cleanup Complete Determination - Klawock Heenya Cannery Tank Farm, Crab Creek Drum Site, and Shaan-Seet (KIDCO) Sort Yard

Dear Ms. Edenshaw:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the Klawock Heenya Cannery Tank Farm, Crab Creek Drum Site, and Shaan-Seet (KIDCO) Sort Yard. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and that Klawock Heenya Cannery Tank Farm, Shaan-Seet (KIDCO) Sort Yard, and Crab Creek Drum Site will be closed in ADEC's records.

This decision is based on the administrative records for these sites which are located in the ADEC Juneau office. This letter summarizes the decision process used to determine the environmental status of these sites and provides a summary of the regulatory issues considered in the Cleanup Complete Determination.

The contaminated soil from the three sites covered in this letter was combined in the Klawock Island Bioremediation Facility. This bioremediation facility is a separate contaminated site on the ADEC database and was closed on 1/12/06 because the soil concentrations of diesel range organics met the required cleanup levels.

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Introduction

Site Name and Location:
Klawock Heenya Cannery Tank Farm, Klawock, AK
Crab Creek Drum Site, Klawock, AK
Shaan-Seet (KIDCO) Sort Yard, Klawock, AK

Name and Mailing Address of Contact Party:
Mary Edenshaw
Klawock Heenya Corporation
P.O. Box 129
Klawock, AK 99925

Regulatory authority under which the site is being cleaned up:
18 AAC 75

Klawock Heenya Cannery Tank Farm

Background

The former cannery site on Bayview Blvd. was listed on DEC's contaminated sites database in 1993. Diesel contamination was present in soil from around old storage tanks located within an unlined, earthen containment berm. In 1996 it was noted in our database record that the site has been reconstructed and converted to residential property. City of Klawock, Public Works Department verified that all the residences in this area have been hooked up to municipal water.

Site Investigation and Cleanup Chronology

In 1994, approximately 4,000 cubic yards of petroleum-contaminated soil were removed down to bedrock and incorporated into the Klawock Island biocell. There were obstructions of road pavement and neighboring foundations that prevented the removal of all contaminated soil. After the contaminated soil removal, the entire site was rebuilt with clean fill. In the confirmation soil samples taken at this time, diesel range organic hydrocarbon concentrations were as high as 1,960 parts per million (ppm).

Cleanup Levels

The 1993 approved soil cleanup levels for this site are established in 18 AAC 75.341, Method One, Table A1, Part B.

Contaminant	Site Cleanup Level (mg/kg)
Diesel Range Organics (DRO)	200
Residual Range Organics (RRO)	2,000

Exposure Pathway Analysis

Exposure pathways are the conduits by which contamination may reach human or ecological receptors. Potential exposure pathways, presented in Table 1 and 2 were evaluated using ADEC's Exposure Tracking Model (ETM).

All potential exposure pathways are either de-minimis, incomplete, or controlled. "De-minimis exposure" means that in ADEC's judgment humans or wildlife will be minimally affected by the small volume of remaining contamination. "Pathway incomplete" means that in ADEC's judgment contamination has no potential to contact humans or wildlife. "Exposure controlled" means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

Table 1 – Exposure Tracking Model Results for Klawock Heenya Cannery Tank Farm

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	The former tank site is now capped and serves as parking.
Sub-Surface Soil Contact	Pathway Incomplete	The former tank site is now capped and serves as parking.
Inhalation – Outdoor Air	Pathway Incomplete	The former tank site is now capped and outdoor air quality should not be affected.
Inhalation – Indoor Air (vapor intrusion	Pathway Incomplete	Cleanup conducted in 1994. Residual contamination, if present, is expected to pose minimal risk to onsite

		buildings.
Groundwater Ingestion	Pathway Incomplete	No groundwater usage as this site which is located close to marine shoreline on shallow bedrock. The residences and cannery are connected to city water.
Surface Water Ingestion	Pathway Incomplete	Surface water in the area not used as a drinking water source.
Wild Foods Ingestion	Pathway Incomplete	The majority of contaminated soil was removed from the site. Wild foods ingestion is not an issue.
Exposure to Ecological Receptors	Pathway Incomplete	Cleanup conducted in 1994. Residual contamination, if present, expected to pose minimal risk to nearby aquatic receptors.

Shaan-Seet (KIDCO) Sort Yard

Background

The sort yard is a large, mostly level area used for sorting timber prior to shipping it by water and is currently in active use. Maintenance and fueling activities occur primarily in the shop area. Four discrete areas of concern at this site were addressed in the original corrective action plan by ESL Consultants. These areas were the former AST site, the fuel stump area, Area 6, and the main excavation area. All of these areas except for the main excavation were granted a no further action by ADEC in 1998.

Site Investigation and Cleanup Chronology

Cleanup actions were conducted at this site in 1993. The sort yard shop building and slab were removed. Soils from the main excavation, area 6, the fuel stump area, and the former above ground water storage tank area were excavated, sorted and either placed in the Klawock Island biocell or used as backfill. Emcom estimated that the total volume of soil excavated and taken to the biotreatment cell was about 1,300 cubic yards. Confirmation samples taken at this area showed DRO and 1,1,1-Trichloroethane concentrations above cleanup levels.

Eight to nine feet of clean fill was placed in the excavation pit following contaminant source removal.

Contaminants of Concern

During the investigation at this site, soil samples were analyzed for: diesel range organics (DRO); gasoline range organics (GRO); and benzene, toluene, ethylbenzene, and xylenes (BTEX). The following contaminants of concern were identified:

- Diesel Range Organics (DRO)
- 1,1,1-Trichloroethane

Cleanup Levels

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

Contaminant	Site Cleanup Level (mg/kg)
Diesel Range Organics (DRO)	230
1,1,1-Trichloroethane	0.9

Table 2 – Exposure Tracking Model Results for Shaan-Seet Sort Yard

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Cleanup completed in 1993. Eight feet of clean fill was placed at the time of contaminant source removal.
Sub-Surface Soil Contact	Pathway Incomplete	Cleanup completed in 1993. Eight feet of clean fill was placed at the time of contaminant source removal.

Inhalation – Outdoor Air	Pathway Incomplete	Cleanup completed in 1993. Eight feet of clean fill was placed at the time of contaminant source removal.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	No buildings onsite.
Groundwater Ingestion	Pathway Incomplete	Groundwater is not used as a drinking water source at this site.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source at this site.
Wild Foods Ingestion	Pathway Incomplete	Wild foods would not be collected from this site due to its industrial nature.
Exposure to Ecological Receptors	Pathway Incomplete	Cleanup conducted in 1993. Residual contamination, if present, expected to pose minimal risk to nearby aquatic receptors.

ADEC has elected **not** to pursue additional action at the main excavation area at Shaan-Seet Sort Yard because:

1. Eight to nine feet of clean fill was placed following contaminant source removal.

2. Groundwater at the site is not used as a drinking water source.

3. Groundwater contamination 12 years after source removal should be stable at this time, is likely below cleanup levels, and is not likely migrating to nearby surface waters.

4. Detected volatiles are common laboratory contaminants and, if present at the site, likely represent a very minimal soil volume.

5. The sort yard continues to be an operating industrial facility.

Crab Creek Drum Site

Background

The Crab Creek Shop, located at Mile 1.5 of the Crab Creek road on Prince of Wales Island, Alaska, is the former site of logging-related heavy equipment maintenance. A maintenance shop containing two service bays was located at the site.

Site Investigation and Cleanup Chronology

Surface staining was a concern in the two former service bays where high levels of used oil contamination (19,100 – 33,300 mg/kg total petroleum hydrocarbons (TPH)) were found in the top foot of sediment.

In 1994, soil totaling approximately 330 cubic yards was excavated and taken to the Klawock Island biocell. The confirmation samples taken from the floor of the excavation showed TPH as diesel at concentrations ranging from 19 mg/kg to 524 mg/kg. Two of the samples exceeded the ADEC Level B cleanup level for TPH as DRO of 200 mg/kg.

In the site file and database record there is brief mention of damaged drums being stored on this site back in the early 1990s, but a site visit performed by ADEC representative Bruce Wanstall in late October 2009 could find no presence of any drums.

Cleanup Levels

The 1993 approved soil cleanup levels for this site are established in 18 AAC 75.341, Method One, Table A1, Part B.

Contaminant	Site Cleanup Level (mg/kg)
Diesel Range Organics (DRO)	200
Residual Range Organic (RRO)	2,000

Exposure Pathway Analysis

Table 2 – Exposure Tracking Model Results for Crab Creek Drum Site

Pathway	Result	Explanation
Surface Soil Contact	De Minimis Exposure	The contaminated soil associated with the former drum storage was removed in 1994. There may be surface soil staining since this site is periodically used by the public to dump debris.
Sub-Surface Soil Contact	De Minimis Exposure	The contaminated soil associated with the former drum storage was removed in 1994. There may be surface soil staining since this site is periodically used by the public to dump debris.
Inhalation – Outdoor Air	De Minimis Exposure	The majority of contaminated soil was removed in 1994 therefore outdoor air inhalation should not be an issue at this site.
Inhalation – Indoor Air (vapor intrusion	Pathway Incomplete	No buildings on the site
Groundwater Ingestion	De Minimis Exposure	Groundwater not used as a drinking water source at this site.
Surface Water Ingestion	De Minimis Exposure	Surface water not used as a drinking water source at this site.
Wild Foods Ingestion	Pathway Incomplete	Not an area likely to be used for wild foods collection
Exposure to Ecological Receptors	Pathway Incomplete	Cleanup conducted in 1994. Residual contamination, if present, expected to pose minimal risk to nearby aquatic receptors.

Determination

The cleanup actions employed at the Klawock Heenya Cannery Tank Farm, Shaan-Seet (KIDCO) Sort Yard, and Crab Creek Drum Site were effective in removing a majority of the contaminant source material. Based on the information provided to date, ADEC has determined that the residual contamination remaining on site poses no unacceptable risk to human health or the environment and no further remedial action is required.

This determination is subject to the following conditions:

1. This information will be recorded on the ADEC database to document that residual contamination remains. The information is publically accessible through the Contaminated Sites Program web site.

2. ADEC approval is required prior to offsite transport of soil or groundwater in accordance with 18 AAC 78.274(b).

3. Soil containing residual contamination may not be placed in surface water or other environmentally sensitive areas.

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 99811-1800, 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 99811-1800, 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 me at (907) 465-5229.

Sincerely yours,

Evonne Reese

Evonne Reese
Environmental Program Specialist