

# STATE OF ALASKA

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

**FRANK MURKOWSKI, GOVERNOR**

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File: 210.26.002

June 9, 2006

Linda Lester  
Mentasta Lodge LLC  
hc 01 Box 585  
Gakona, AK 99586

Re: Mentasta Lodge Underground Storage Tank System  
Mile 78.1 Glenn Highway

Dear Ms. Lester:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) reviewed the Gilfilian Engineering & Environmental Testing, Inc. June 1998 report *Site Assessment of UST System Closure: Mentasta Lodge* regarding the underground storage tank system at the lodge. Based on the information from this report and the administrative file, ADEC has determined that soil contamination remains on site above the most stringent 18 AAC 75.341 soil cleanup levels but the nature and extent of the contamination do not pose an unacceptable risk to human health or the environment. This determination is subject to site specific conditions and, if complied with, will require no further remedial action at this time.

Please note the following information that was considered in making the determination on the environmental status of the site.

### **Site Background**

The Mentasta Lodge is located at Mile 78.1 of the Glenn Highway (also known as the Tok Cutoff). It serves as a lodging and retail gas facility with an onsite drinking water well located several hundred feet from the underground storage tank (UST) system. The depth to groundwater is approximately 30 to 40 feet below ground surface (bgs).

In 1998, two USTs (a 5,000-gallon gasoline and a 1,000-gallon diesel) were removed, along with associated piping and a dispenser island. They were replaced with a 6,000-gallon gasoline UST and new piping and dispenser island in the former UST location.

The former gasoline tank had failed a tightness test in 1993. During the tank removal in 1998, contaminated soil was encountered until the excavation stopped approximately 11 feet bgs. At the limits of excavation gasoline range organics (GRO) levels remained at up to 690 milligrams per kilogram (mg/kg). In order to assess the extent of the contamination, a test pit was excavated 16 feet bgs that detected GRO but not above ADEC cleanup levels.

Approximately 175 cubic yards of contaminated soil was excavated and landfarmed on site. The initial contaminant levels identified 1600 mg/kg GRO, 0.586 mg/kg benzene, and 365 mg/kg total Benzene, Toluene, Ethylbenzene, and Xylene (BTEX). The landfarm soil was tilled several times in the last eight years by the owners of the property and is currently overgrown with vegetation.

### **Pathways Evaluated**

The following exposure and/or migration pathways were considered in this decision document.

The exposure pathways for human health include indoor and outdoor air inhalation; ingestion of soil; dermal contact with soil; and ingestion of groundwater or surface water.

The contaminant levels remaining do not exceed the 18 AAC 75.341 Method 2 cleanup levels for human health pathways of ingestion and inhalation. The groundwater ingestion pathway may be considered an exposure pathway but the water well is located several hundred feet from the contaminated soil and water samples in 1999 and 2002 did not identify any impacts from contamination.

The migration to groundwater pathway may be complete but groundwater was not detected during the excavation and soil sample results from the excavation did not detect contamination above ADEC cleanup levels.

### **Cleanup Levels**

The soil cleanup levels established for this site are the 18 AAC 75.341 Tables B1 and B2 Method Two, "under 40 inch zone" migration to groundwater levels.

The groundwater cleanup levels are the 18 AAC 75.345 Table C levels.

### **ADEC Decision**

Based on the information provided to date, ADEC has determined that the cleanup actions employed at the Mentasta Lodge have been effective in removing the majority of the contamination at the site.

The contamination remaining on site does not pose a risk to human health or the environment provided site specific conditions and/or controls are attached to the property. Furthermore, the landfarm soil has been treated over the years and the nature of the contamination (GRO and BTEX) is amenable to natural degradation over time. It is assumed the landfarmed soil does not pose a risk and is approved to remain on site. As a result of this determination, ADEC will require no further actions subject to the following conditions:

1. An Institutional Control will be added to the ADEC Contaminated Sites Database identifying the nature and extent of contamination remaining on site.
2. In accordance with 18 AAC 78.274(b), ADEC approval must be obtained prior to removal and/or disposal of soil from this site to an off-site location.

3. The drinking water well shall be sampled in 2006 for volatile organic carbons (VOCs) to ensure groundwater quality is not impacted by the remaining soil contamination. Please use the EPA Method 524.2 to properly analyze the quality of the groundwater. The results of this sample will be analyzed (by ADEC) prior to determining if future monitoring is required.

In accordance with 18 AAC 78.276(f)(2) ADEC may require additional site assessment, monitoring, remediation, and/or other necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

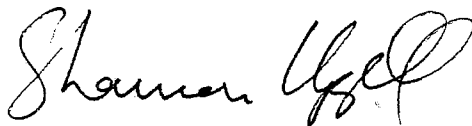
Site closure (without conditions) can be achieved when soil sampling confirms that all soil meets the most stringent 18 AAC 75.341 Method Two, migration to groundwater, Under 40 Inch Zone, cleanup levels.

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, P.O. Box 111800, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99811-1800, within 15 days of the decision.

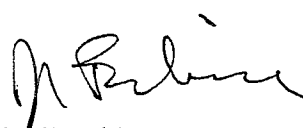
Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, P.O. Box 111800, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99811-1800, within 30 days of the decision. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have any questions, please contact Shannon Uzzell at (907) 451-2104 or via e-mail at [Shannon\\_Uzzell@dec.state.ak.us](mailto:Shannon_Uzzell@dec.state.ak.us).

Sincerely,



Shannon Uzzell  
Environmental Program Specialist



Jim Frechione  
Environmental Program Manager