

STATE OF ALASKA

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

SEAN PARNELL, GOVERNOR

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File: 102.38.122

August 31, 2011

Rawson, Blum, and Company
Law Offices of Thomas H. Bomar
425 California Street, Suite 200
San Francisco, CA 94104

Re: Request to Decommission the Soil Vapor Extraction Remediation System and Change the Cleanup and Long-term Monitoring Plan at Bentley Mall East Satellite Building, Lot 217 and 22, Fairbanks, Alaska

Dear Mr. Rawson:

The Alaska Department of Environmental Conservation (ADEC) received a request from your consultant, Environmental Resource Group, Inc. (ERG) to alter the cleanup plan for the Bentley Mall East Satellite Building, Lot 217 and 225, Fairbanks, Alaska. The original cleanup plan for this site was described in the March 2007 Record of Decision.

In their May 27, 2011 letter, ERG requested to turn off and remove the soil vapor extraction system. The site has not yet achieved cleanup levels, but the data indicate the system has removed a significant amount of the contamination and reached diminishing returns. ERG recommended monitored natural attenuation as the alternate cleanup plan to achieve final cleanup levels. Their proposed monitoring schedule is:

- September 2011
- March/April and Sept/October 2012 and
- March/April and Sept/October 2013

After these semi-annual events, ERG would like to move to a single annual event and ultimately even less frequent.

ADEC approves these changes to the cleanup plan and monitoring schedule with the following comments:

1. Once the decommissioning of the remediation system is complete, please submit a letter to ADEC documenting the removal of the system and any wells or infrastructure that may still remain.
2. ADEC will continue to expect groundwater monitoring reports on an annual basis that will include the results of the semi-annual events along with the

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historical results so we can evaluate the rate of progress towards meeting the cleanup levels. In these reports, ERG can recommend a reduction in sampling frequency or methodology for ADEC to approve. Each change in frequency requires contacting ADEC and obtaining approval.

3. If there are any changes in ownership to the property, construction that warrants soil excavation or groundwater pumping, or a significant change in the land use, ADEC must be notified so that we can be certain there are no changes that could result in exposure to the remaining contamination onsite.

If you have any questions regarding this letter or the requirements of the record of decision, please contact me at ann.farris@alaska.gov or at (907) 451-2104. I will be transferring this site to our Institutional Control Group since it is now entering a long-term monitoring phase with no active remediation. You will receive a subsequent letter with new contact information. Thank you for your continued diligence on this site.

Sincerely,



Ann Farris
Environmental Engineer Associate