

# STATE OF ALASKA

SEAN PARNELL, GOVERNOR

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

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File: 2407.38.026  
Certified Return Receipt  
Article No: 7009 2820 0001 7169 6880

April 12, 2011

Mr. Eric Ritner, Director of Operations  
KRK Management  
2500 Sentry Drive  
Anchorage, Alaska 99507

Re: Decision Document; Kuskokwim Inn/Long House Bethel Inn  
Cleanup Complete with Institutional Controls Determination

Dear Mr. Ritner:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the environmental records associated with Kuskokwim Inn/Long House Bethel Inn site located in Bethel, Alaska. 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 no further remedial action will be required as long as the site is in compliance with established institutional controls (ICs).

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:

Kuskokwim Inn/Long House Bethel Inn  
751 Third Avenue  
Bethel, Alaska 99559

### Name and Mailing Address of Contact Party:

Mr. Eric Ritner  
KRK Management  
2500 Sentry Drive  
Anchorage, Alaska 99507

ADEC Site Identifiers:

ADEC Reckey: 1999250120001

File: 2407.38.026

Hazard ID: 3206

Regulatory authority under which the site is being cleaned up:

18 AAC 75

**Background**

Petroleum impacted soil and groundwater were detected above cleanup levels after the removal of an underground heating oil tank (HOT) in 1999. This site which was originally called the Kuskokwim Inn in the CSP database, has been updated to include the current name of Long House Bethel Inn.

**Contaminants of Concern**

During the investigations at this site, soil and groundwater samples were analyzed for one or more of the following: diesel range organics (DRO); gasoline range organics (GRO); residual range organics (RRO); benzene, toluene, ethylbenzene, and xylenes (BTEX), polynuclear aromatic hydrocarbons (PAH) and total organic carbon (TOC). Based on these analyses and knowledge of the source area, the following contaminants of concern were identified:

- 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, Migration to Groundwater (MTG).

<u>Contaminant</u>	<u>MTG Cleanup Level (mg/kg)</u>
DRO	250
Benzene	0.025

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

<u>Contaminant</u>	<u>Cleanup Level (mg/L)</u>
DRO	1.5
Benzene	0.005

**Site Characterization and Cleanup Activities**

During July 1999, a 1,000-gallon underground heating oil tank (HOT) was removed from the north side of the west wing of the Long House Bethel Inn. Confirmation soil samples collected from beneath the former HOT did not contain contaminants above cleanup levels. However, field screening indicated that a small volume of hydrocarbon impacted soil remained on the south side of the excavation, possibly extending beneath the foundation of the building.

The excavation was filled with clean backfill, and the excavated soil was land-farmed on site in a treatment cell. The treatment cell was sampled twice in 2001. Concentrations of DRO were found up to 675 mg/kg; all results were below the Method Three Alternative Cleanup Level for DRO approved for this site of 887 mg/kg. The soil from the treatment cell was then spread on-site.

In August 2000, seven soil borings were advanced at the site and five were completed as monitoring wells to further evaluate the nature and extent of contamination. Soil samples collected from the boreholes contained concentrations of DRO up to 613 mg/kg.

Monitoring wells MW-1, MW-2, and MW-5 were sampled on four occasions from 2000 to 2004; and wells MW-3 and MW-4 were sampled twice before being decommissioned in 2004. Contaminants were not detected in groundwater except at MW-5, which was installed in the location of the former HOT. In 2000, DRO and benzene were detected at 18.6 mg/L and 0.0174 mg/L, respectively. These concentrations decreased to 13 mg/L DRO, and 0.0075 mg/L benzene in samples collected in 2004. Groundwater was found approximately 7-10 feet below ground surface (bgs).

A well search conducted in 1999 identified six drinking water wells within ¼ mile of the site. The wells were completed at a depth of 360 feet bgs or more. The well search also suggested that deep groundwater resources are protected by an ice-rich permafrost layer which extends to a minimum depth of 350 feet bgs. The drinking water well on site was completed at a depth of 400 feet bgs and sampled in 2001 and 2004. Sample results indicate the well had not been impacted by hydrocarbon contamination.

### **Pathway Evaluation**

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

**Table 1 – Exposure Pathway Evaluation**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Surface Soil Contact	De-Minimis Exposure	Contaminated surface soil has been excavated, treated and landspread on site; clean fill was used to restore grade. Remaining contamination is considered de minimis in volume.

Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Remaining soil contamination is overlain with backfill; concentrations are below inhalation cleanup levels for DRO and benzene for outdoor air; and no other volatile compounds are present above the most conservative criteria. Therefore, exposure via this pathway is considered de minimis; and risk, insignificant.
Groundwater Ingestion	De-Minimis Exposure	The site drinking water well was installed at 400 feet bgs; past results indicated it had not been impacted by contaminants of concern; and there is a thick permafrost layer acting as a barrier. Therefore, exposure via this pathway is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site; therefore, this pathway is considered incomplete.
Wild Foods Ingestion	Pathway Incomplete	This site is in a well developed area and not a source for wild foods collection; therefore, this pathway is considered incomplete.
Exposure to Ecological Receptors	Pathway Incomplete	Remaining contamination is under the building and there is no evidence of offsite migration; therefore, the pathway is considered incomplete.

Notes to Table 1: “De-Minimis exposure” means that in ADEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway Incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors. “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.

### **ADEC Decision**

Contamination remains on site above established default cleanup levels; however ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be issued 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 Kuskokwim Inn/Long House Bethel Inn or KRK Management shall report to ADEC every five years to document land use, or report as soon as the Kuskokwim Inn/Long House Bethel 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. Installation of groundwater wells will require approval from ADEC.
3. All monitoring wells on-site must be decommissioned in accordance with ADEC guidance, or an approved workplan by September 30, 2011. A letter report documenting these activities must be received/approved by ADEC prior to the site status changing to Cleanup Complete and removing the ICs.
4. Any proposal to transport soil or groundwater 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.)
5. Soil contamination may be located under the former heating oil tank and beneath the building (see attachment B). When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved workplan, and/or to the satisfaction of ADEC.
6. 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, Institutional Controls will be terminated.

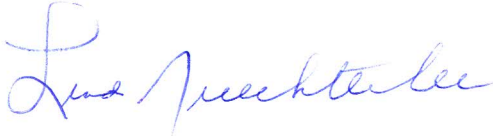
This determination is in accordance with 18 AAC 75.380(d) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

### **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.

Approved By,



Linda Nuechterlein  
Environmental Manager

Recommended By



Pam Clemens  
Environmental Program Specialist

Attachment A: Cleanup Complete-ICs Agreement Signature Page

Attachment B: Site Figure

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

The Kuskokwim Inn/Long House Bethel Inn agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision Document dated **April 12, 2011** for the Kuskokwim Inn/Long House Bethel Inn. 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).



DIRECTOR OF OPERATIONS

Signature of Authorized Representative, Title  
Kuskokwim Inn/Long House Bethel Inn

ERIC RITNER DIRECTOR OF OPERATIONS

Printed Name of Authorized Representative, Title  
Kuskokwim Inn/Long House Bethel Inn

**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 at the address on this correspondence within 30 days of receipt of this letter.**

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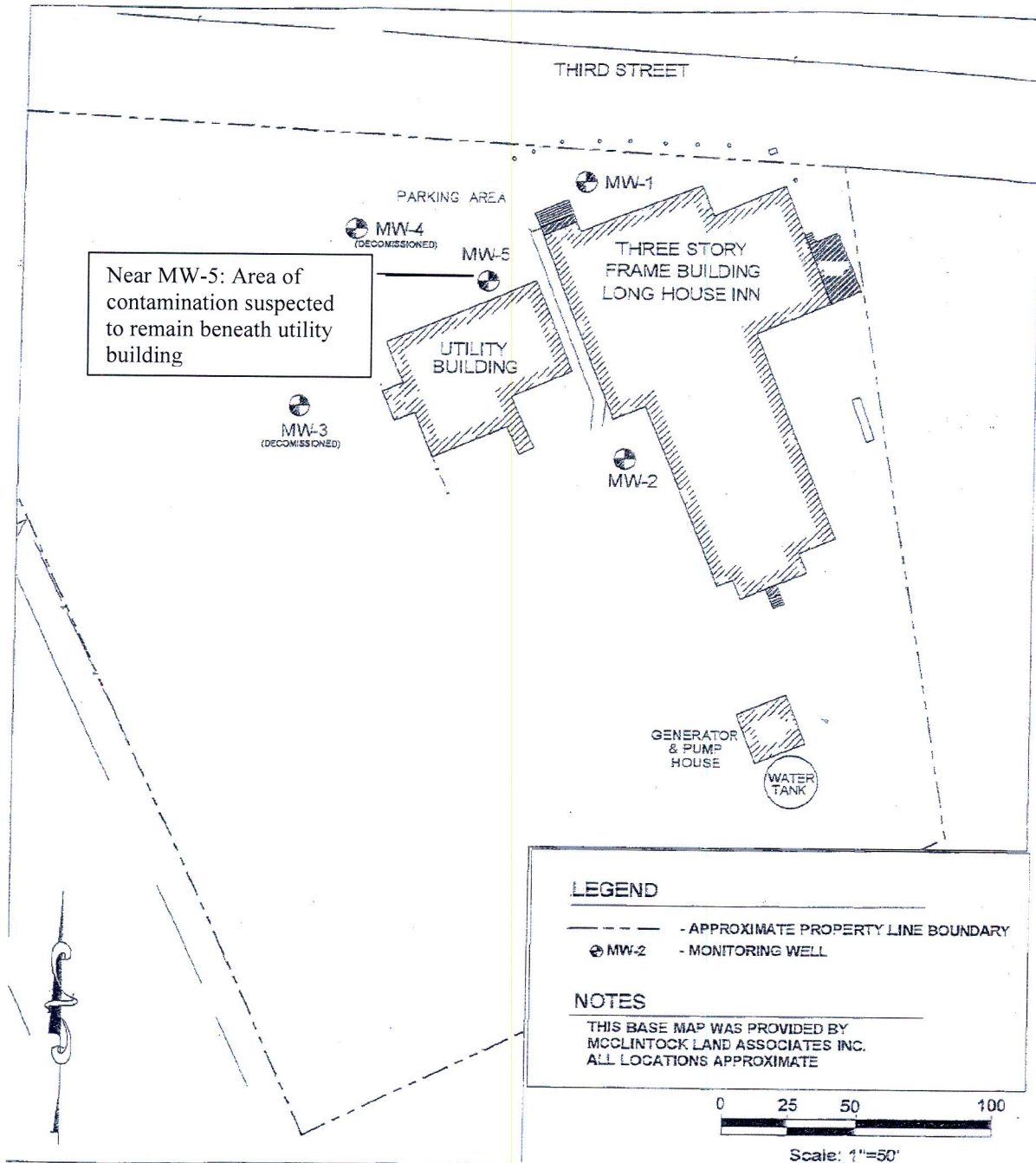
ADEC File No.                    2407.38.026  
Hazard ID:                        3206  
ADEC Project Manager: Pam Clemens

**For Internal Use Only**

**\*Attention ADEC Administration Staff:** Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

**Attachment B: Site Figure**



Kuskokwim Inn/Long House Bethel Inn 751 Third Avenue Bethel, Alaska