THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File No: 1526.38.011

April 30, 2014

Jeff Hamilton
Hamilton Construction, LLC
P.O. Box 648
Skagway, AK 99840-0648

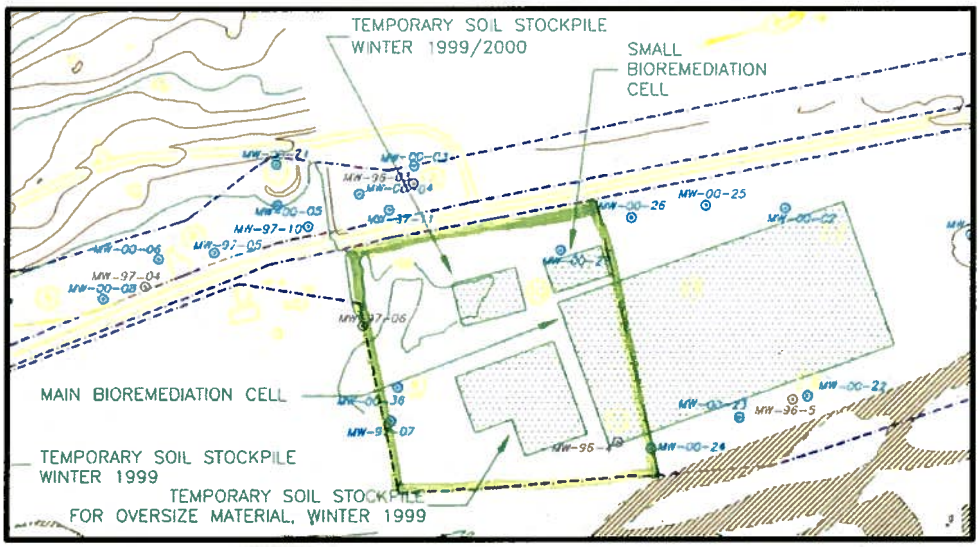
Re: Decision Document: Skagway Tank Farm – no further treatment and sampling of the biocell area

Dear Mr. Hamilton:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the biocell portion of the referenced site shown in the diagram below. No further tilling or sampling of the biocell soil is required. **This decision document applies to the biocell area only.** There are some remaining unknowns within the original Skagway Tank Farm boundaries with regards to groundwater monitoring wells but these should not affect the former biocell area.

DEC Site Identifiers:
File No: 1526.38.011
Hazard ID: 2541

Regulatory Authority for Determination:
18 AAC 75



Site Description and Background

The biocell was constructed during the late fall of 1999 in order to accommodate petroleum hydrocarbon and solvent-impacted soil that was excavated from the Tank Farm and the White Pass Shops site.

A Conditional Closure letter for the entire tank farm site was issued in 2002 and included information about the biocell construction and the treatment requirements. A copy of this document is enclosed.

The approximate dimensions of the original biocell were 1200' x 480' and approximately 4' thick and contained 85,000 cubic yards of soil. Shop soil with volatile organic compounds (VOCs) was placed in the southern portion along with tank farm soil in the southern and northern portions. The treatment of the biocell included tilling and the addition of fertilizer during the summer months. As the contaminant concentrations in the top layers of the biocell have decreased and met cleanup levels, lifts of remediated soil were removed according to the following:

- July 2002 (32,000 cubic yards removed)
- October 2004 (12,000 cubic yards removed)
- May 2007 (29,000 cubic yards removed)
- November 2011 (3,600 cubic yards removed)

The removal of soil in 2007 included all soil from the southern portion; therefore the remaining soil contained petroleum only. Since that time there has been petroleum sampling only. In 2011 the remaining 8,400 cubic yards of soil was consolidated into 360' x 270' and approximately 18" thick so that treatment could continue.

On May 14, 2013 soil characterization of the remaining soil was conducted using a multi-incremental sampling design. All soil samples met cleanup levels except for two that were slightly above cleanup levels. Due to the low risk of exposure and the assumption that petroleum hydrocarbon concentrations will continue to degrade on their own, all future tilling and sampling requirements were removed in October 2013.

ADEC Decision

Remaining petroleum contamination in soil is below approved cleanup levels in most areas of the biocell. If there are any remaining groundwater monitoring wells on this property they will need to be properly decommissioned. All future biocell treatment and sampling requirements are removed. This property is subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325. 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.

2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This determination is in accordance with 18 AAC 75.380 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 decision, please feel free to contact me at (907) 465-5229.

Sincerely,

Evonne Reese

Evonne Reese
Project Manager

Encl: 2002 Conditional Closure letter

cc: White Pass and Yukon Railroad
Golder and Associates