



THE STATE
of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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Sent via regular and electronic mail

Beth Astley
CEPOA-PM-C-FUDS
P.O. Box 6898
JBER, AK 99506-6898

Re: ADEC Site Closure and No Department of Defense Action Indicated Report
Haines-Fairbanks Pipeline Milepost 475.25 – Gate Valve 59, Near Dot Lake, Alaska

Dear Ms. Astley,

The Alaska Department of Environmental Conservation (ADEC) has received and reviewed a copy of the Gate Valve #59 *No Department of Defense Action Indicated (NDAI) Report*, provided via electronic mail on April 27, 2016. Please find enclosed with this letter a copy of the ADEC signed signature page. The purpose of letter is to provide additional information regarding the remaining contamination which was not included in the NDAI report. This information was gathered from the *Final Remedial Investigation Report Gate Valve #45, Gate Valve #49, Gate Valve #52, and Gate Valve #59 Sites*, dated October 2012 and the *Final Groundwater Monitoring Report Gate Valve #59*, dated April 2014, both by Fairbanks Environmental Services Inc. on behalf of U.S. Army Corps of Engineers, Alaska District (USACE).

Gate Valve # 59 is located near Dot Lake at Alaska Highway Milepost 1364.5 (Figure 1). There were no documented fuel releases at the site, however, Gate Valve #59, along with all other gate valves, was investigated as a possible release location. In 2007, an investigation involving a limited excavation led to the discovery of petroleum contaminated soil. As a result, the gate valve, vault, and approximately 20 cubic yards of contaminated soil near the valve vault were removed. This soil was excavated from the surface to about 8 feet below ground. Three (3) samples were collected from the excavation. The sample from the bottom of the pit exceeded the default 18 Alaska Administrative Code (AAC) 75.341, Table B2 ADEC cleanup level of 250 milligrams per kilogram (mg/kg) for diesel range organics (DRO) having a concentration of 2,200 mg/kg, and 230 mg/kg for gasoline range organics (GRO) having a concentration of 260 mg/kg. No additional contaminants of concern were identified.

In the 2008 site assessment, a Rapid-Optical Screening Technology (ROST) probe was used to delineate the extent of petroleum contamination, but the assessment was hindered by discontinuous permafrost and/or rocks. Using the ROST probe, petroleum signatures were found at various depths from 2-45 feet below ground surface. Petroleum odor and sheen on groundwater were also observed in some locations. An analytical result of a soil sample collected south of the gate valve showed a DRO concentration of 1,000 mg/kg at 2-4 feet below ground surface.

In the 2011 Remedial Investigation, soil borings were advanced using a drill rig and twenty (20) soil samples were collected. Three (3) samples were found to contain concentrations of arsenic in exceedance of the cleanup level. Given that no sources of potential arsenic contamination exist at the site, ADEC believes that these results are due to natural-occurring background conditions. Groundwater monitoring wells were installed and six (6) groundwater samples were collected. One groundwater sample collected closest to the gate valve location exceeded the 18 AAC 75.345, Table C ADEC cleanup level of 1.5 milligrams per liter (mg/L) for DRO having a concentration of 1.8 mg/L. A second groundwater sample collected from near the gate valve also had an elevated DRO concentration, but was below the cleanup level. A second round of groundwater samples were collected on September 23, 2013 and all of the sample results were found to be below their respective cleanup levels.

Samples collected in 2007 and 2008 show that there is a small volume of GRO and DRO contamination at concentrations above the cleanup level still present near the former gate valve. The extent of the contamination is fairly small and would be difficult to remove due to the proximity of the Alaska Highway. While the concentrations exceed the default cleanup levels based upon contaminant migration from soil to groundwater used as a drinking water source, they are below the ADEC human health exposure pathway concentrations for direct contact or outdoor inhalation. Groundwater monitoring results from wells near and downgradient from the remaining soil contamination have met the cleanup level demonstrating that the petroleum soil contamination does not pose an unacceptable risk to the groundwater at the site. Therefore, in accordance with 18 AAC 75.380, the ADEC concurs with the USACE in their determination that no further action is required at the Gate Valve 59 site. The site status will be changed to Cleanup Complete in the ADEC Contaminated Sites Database and 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 (see figure below).
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 may be reevaluated in the event that additional information becomes available or a threat to human health or the environment is determined present.

If you have any questions regarding this letter or concerns please feel free to contact Danielle Duncan by telephone at 907-465-5207 or email at Danielle.Duncan@alaska.gov.

Sincerely,

Kim DeRuyter
Environmental Program Manager

Enclosure: Signed NDAI

cc: Anne Marie Palmieri, Environmental Program Specialist IV, ADEC, via electronic mail
Brent Nelson, Environmental Manager, Northern Region, ADOT, via electronic mail

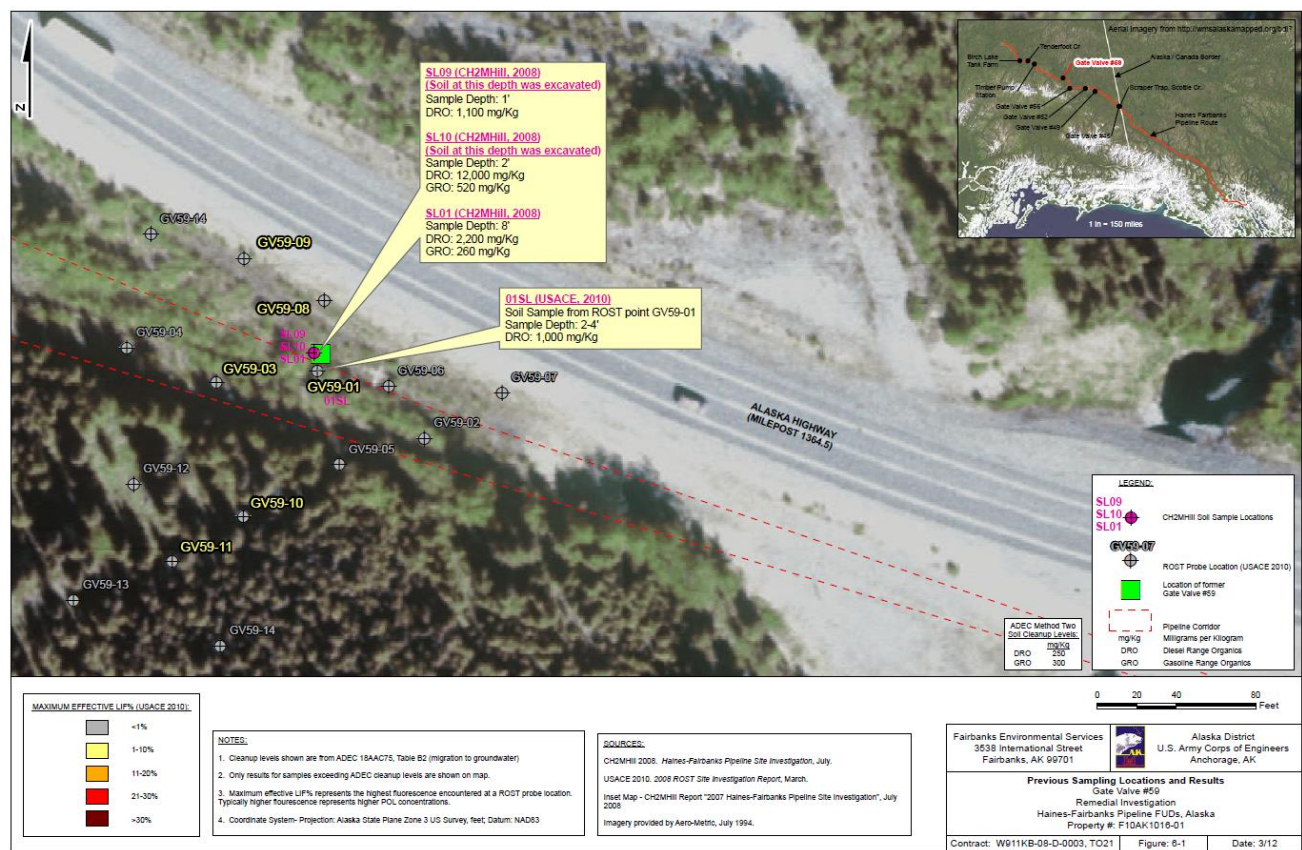


Figure 1: Location of the Gate Valve 69 Contaminated Site and remaining contaminated soil data.

