STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File No. 1528.38.014

Via Electronic and Regular Mail

April 28, 2005

Mr. Ken Vaughan
United States Forest Service
Post Office Box 21628
Juneau, Alaska 99802

RE: No Further Remedial Action Planned
Ratz Harbor Shop Area, Prince of Wales Island, Alaska;
Reckey: 2002130903601; File No. 1528.38.014

Dear Mr. Vaughan:

The Alaska Department of Environmental Conservation (department) has received and reviewed the documentation regarding the Administrative Site Controls forwarded in a letter from Forrest Cole of the United States Forest Service (Forest Service) and dated April 1, 2005.

The site was formerly used as a maintenance support area for the nearby log transfer facility and is located on the eastern coast of Prince of Wales Island in the Tongass National Forest. The site is in a semi-remote area located directly on the road system, which is used recreationally by the general public. Site characterization activities consisted of a May 2002 *Preliminary Assessment/Site Investigation (PA/SI)* documented in the final *PA/SI* report prepared by Kent and Sullivan, Inc. dated April 2003, and December 2002 additional investigations documented in the *Supplemental Investigation* report prepared by Alta Geosciences. Groundwater samples were collected in December 2002, and February and June 2003. The site was found to have metals (lead) and petroleum hydrocarbon contamination in the soil, metals (lead) and petroleum hydrocarbons in the groundwater, and metals (lead) in the intertidal sediments. The Ketchikan Pulp Company (KPC) released an *Engineering Evaluation/Cost Analysis (EE/CA)*, prepared by Farallon Consulting, dated August 2003. The United States Forest Service (Forest Service) issued a Non-Time-Critical Removal Action Memorandum on November 6, 2003. The *Removal Action Workplan* was approved by the department in a letter dated October 8, 2003. The department approved soil cleanup levels of 1000 milligrams per kilogram (mg/kg) for lead, 8250 mg/kg for diesel-range organics, and 8300 mg/kg for residual-range organics and groundwater cleanup levels of 15 micrograms per liter (ug/L) for lead and 1500 ug/L for diesel-range organics. The development of cleanup levels was documented in the August 2003 *EE/CA*. The soil cleanup level for lead is based upon a commercial/industrial land-use for this site, and the cleanup level for diesel-range organics is based upon a site-specific concentration of fractional organic carbon (f_{oc}) in the soil. The groundwater cleanup levels are from 18 AAC 75.345, Table C.

The time critical removal action was conducted in November 2003. A total of 207 cubic yards of soil, debris, and scrap metal was excavated from the site. The soil was transported separately to the

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Chemical Waste Management stabilization and disposal facilities in Arlington, Oregon. All of the final soil confirmation sample results were below the department-approved cleanup levels.

In a letter dated May 14, 2004, the department outlined two (2) requirements, which must be satisfied prior to the department issuing a no further remedial action planned closure letter for this site. The first requirement was successful completion of the groundwater long-term monitoring and the second was the attachment of administrative site controls to the site in the Forest Service's Geographical Information System (GIS) land-management database in order to prevent future residential site use.

The Ketchikan Pulp Company conducted two (2) rounds of groundwater monitoring at the one (1) well on-site, sampling for diesel-range organics and total and dissolved lead in March and June 2004. Sample results showed that diesel-range organics and lead concentrations in this well were below the department-approved cleanup levels.

The department did not approve a cleanup level for lead for the intertidal sediments at this site, but used the State of Washington Sediment Quality Standards (SQS) of 450 mg/kg as a screening value. Given the sporadic nature of the lead battery plate contamination, the department approved the use of the 95th percent upper confidence on the mean to determine compliance with the screening value. An estimated exposure concentration of 289 mg/kg was calculated using ProUCL for a lognormal data set comprised of all sediment sample results from the site characterization activities and the removal action, excluding one sample that contained particulate lead.

As documented in the Administrative Site Controls information, the Forest Service has ensured that the site will not be used residentially in the future without further assessment and/or cleanup. Therefore, the department has determined that no further remedial action is required at this site. Some soil is present at the site that contains contaminants at levels above the most stringent cleanup levels in 18 AAC 75.341, Tables B1 and B2. Prior notification to the department pursuant to 18 AAC 75.325(i) for disposal, movement, or relocation of this soil off-site is not required as long as the conditions set forth in the department's April 25, 2001 letter to the Forest Service waiving that requirement are met. The Forest Service has included the presence of these soils on its GIS-database ensuring its appropriate management. However, please note that if in the future additional contamination is found to be present that may pose an unacceptable risk to human health, safety, welfare or the environment, it must be reported to the department and cleanup may be required.

If you have any questions about this site, please do not hesitate to contact me at 269-7553 or Anne Marie Palmieri, of my staff, at 766-3184.

Sincerely,

for

Jennifer Roberts
Section Manager

cc: Phillip Benning, Ketchikan Pulp Company
Tim Chittenden, USFS-Petersburg
Paul Grabau, Farallon Consulting
Sue Kent, Kent & Sullivan