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. 1504.38.011

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
East Twelve Mile Former Logging Camp, Prince of Wales Island, Alaska;
Reckey 2002130903701; File No. 1504.38.011

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) dated March 30, 2005.

The site was formerly used as a logging camp and 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, dated August 2003. Groundwater and surface water samples were collected in May, August, and October 2002, and February and June 2003. The site was found to have metals (lead) and petroleum hydrocarbon contamination in the soil and lead in the groundwater. A significant feature of the site is the buried debris, which was visible over the edge of the bench. The Ketchikan Pulp Company (KPC) released an *Engineering Evaluation/Cost Analysis (EE/CA)*, prepared by Farallon Consulting, dated August 2003. The Forest Service issued a Non-Time-Critical Removal Action Memorandum on October 10, 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, 8060 mg/kg for diesel-range organics, and 8300 mg/kg for residual-range organics and a groundwater cleanup level of 15 micrograms per liter (ug/L) for lead. The development of cleanup levels was documented in the August 2003 *EE/CA*. The soil cleanup level for lead was based upon a commercial/industrial land-use for this site, and the cleanup level for diesel-range organics was based upon a site-specific concentration of fractional organic carbon (f_{oc}) in the soil. The groundwater cleanup level for lead was from 18 AAC 75.345, Table C.

The time critical removal action was conducted from October to November 2003. A total of 950 cubic yards of soil, debris, and scrap metal was excavated from the site. The soil was transported to

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the 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 11, 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.

Beginning in 2004, the Ketchikan Pulp Company conducted four (4) quarters of groundwater monitoring at three (3) wells on-site. The three (3) monitoring wells, MW-10, MW-15, and MW-16, were sampled for total and dissolved lead in March, June, September, and November 2004. Sample results showed that lead concentrations in these wells were below the department-approved cleanup level of 15 micrograms per liter (ug/L). The department concurred that the long-term groundwater monitoring had been completed successfully on February 7, 2005.

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. The location and boundaries of the landfill have also been documented on the Forest Service's GIS-database. 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 in its GIS-database to ensure their appropriate management. 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 269-7533.

Sincerely,

for

Jennifer Roberts
Section Manager

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