



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 1508.38.017

May 2, 2017

Sent via electronic mail only

Mr. Brad Ryan, Director of Public Facilities
Haines Borough Public Facilities Office
Public Safety Building – Second Floor
P.O. Box 1209
Haines, AK 99827

Re: Institutional Controls (ICs) Verification for:
Haines Borough High School (Hazard ID: 4219)
Haines Borough Vocational Technical School (Hazard ID: 26216)

Dear Mr. Ryan:

The Contaminated Sites Program is conducting an audit of contaminated sites closed with conditions (Institutional Controls) to verify that closure stipulations such as periodic monitoring and reporting are being performed by the responsible party of record as required under state law (18 AAC 75.375).

In April 2014 the Alaska Department of Environmental Conservation (ADEC) granted separate Closure with Institutional Controls Determinations for the two referenced Haines Borough sites: the Haines Borough High School and the Haines Borough Vocational Technical School. In both Determinations was a request that the Institutional Controls (ICs) Agreement Page be signed and returned to ADEC within 30 days of receipt of the letter. However, we have not received the signed ICs agreement page for either site.

Furthermore, the Vocational Technical School Determination included a condition requesting that any remaining groundwater monitoring wells be decommissioned in accordance with ADEC guidance and documentation of well decommissioning be submitted to ADEC within 30 days. We have no record of the monitoring wells having been decommissioned.

The Closure with Institutional Controls Determinations and the Notices of Environmental Contamination recorded on each property outline the original requests, and are enclosed.

Requested Documentation

In order to ensure that conditions at the site are protective of human health, welfare and the environment, ADEC requests that you provide the following:

1. Nature of the current land use of the Haines Borough High School and Vocational Technical School properties.
2. A signed copy of the *Attachment B: Cleanup Complete-ICs Agreement and Signature Page* for both sites in reference. Blank copies of the signature page are enclosed with this letter.

*Please be advised that the following Institutional Controls as established in the 2014 Closure with Institutional Controls Determinations and the 2014 Notices of Environmental Contamination for both the Haines Borough High School and the Haines Borough Vocational Technical School remain in effect:

1. Any future change in land use may impact the exposure assumptions cited in the 2014 Closure with Institutional Controls Determinations and the 2014 Notices of Environmental Contamination. If land use zoning and/or ownership changes, these management conditions may not be protective and ADEC may require additional remediation and revised conditions. Therefore, the Haines Borough and any future property owners shall submit a report to ADEC every three years to document land use, or report as soon as the Haines Borough or any future landowner/operator becomes aware of any change in land ownership and/or zoning use, if earlier, with a written description and photographs of the condition of the ground surfaces overlying the contamination with notation of any changes since the last report. The report can be sent to the local ADEC office or submitted electronically to CS.Submittals@alaska.gov.
2. Sub-surface soil contamination is located near the foundations of the High School building and the Vo-Tech building, and in their utility corridors (Drawing 1). When either or both, the High School building and the Vocational Technical building, are removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
3. Installation of groundwater wells will require approval from ADEC.
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.
5. 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 is concerned that these site conditions remain protective. Failure to maintain these requirements may result in re-opening of one or both of the sites by the Contaminated Sites Program, in which case, further remediation could be mandatory.

Please provide the requested documentation either by hard copy letter or email no later than **June 2, 2017**. If you have any questions about these requirements, please do not hesitate to contact me at (907) 465-5229 or evonne.reese@alaska.gov.

May 2, 2017

Sincerely,



Evonne Reese
Environmental Program Specialist
Institutional Controls Unit

Encl: Attachment B: Cleanup Complete-ICs Agreement and Signature Page – **High School** (blank copy)
2014 Closure with Institutional Controls Determination (**High School**)
2014 Recorded Notice of Environmental Contamination (**High School**)
Attachment B: Cleanup Complete-ICs Agreement and Signature Page – **Vo-Tech** (blank copy)
2014 Closure with Institutional Controls Determination (**Vo-Tech**)
2014 Recorded Notice of Environmental Contamination (**Vo-Tech**)

Note: This letter is being transmitted to you in electronic format only. If you require a paper copy, let us know and we will be happy to provide one to you. In the interest of reducing file space, the Division of SPAR/Contaminated Sites Program is transitioning to electronic transmission of project correspondence.

You may submit any needed documentation electronically. If your submittal is too large to email (i.e. exceeds 20 megabytes), you may submit it to me through the Alaska ZenVo "drop-off" option at <https://dmp.state.ak.us/dmp/>. The Division of SPAR/Contaminated Sites Program prefers and encourages electronic submittals.