



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

410 Willoughby Ave., Suite 303
P.O. Box 111800
Juneau, Alaska 99811-1800
Main: 907.465.5390
Fax: 907.465.5218
www.dec.alaska.gov

File: 1508.38.017

July 18, 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: 2nd Request – 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). This letter marks our 2nd request for compliance with the institutional controls placed on the two referenced Haines Borough contaminated sites: Haines Borough High School and Haines Borough Vocational Technical School.

In April 2014 the Alaska Department of Environmental Conservation (ADEC) granted separate Closure with Institutional Controls Determinations for the two referenced Haines Borough sites. 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.

July 18, 2017

REQUESTED DOCUMENTATION

In order to ensure that conditions at these sites 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 pages are enclosed with this letter.
3. An update on the groundwater monitoring wells at the Vocational Technical School. Have the wells been decommissioned?
 - If the wells have already been decommissioned, ADEC requests you provide the report documenting well decommissioning activities.
 - If the wells have not yet been decommissioned, please make arrangements to have decommissioning performed as soon as possible. Wells must be decommissioned in accordance with the 2013 ADEC Monitoring Well Guidance – http://dec.alaska.gov/spar/csp/guidance_forms/docs/Monitoring_Well_Guidance.pdf.

*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.

Mr. Brad Ryan, Director of Public Facilities; Haines Borough
Haines Borough High School & Haines Borough Vocational Technical School

July 18, 2017

The ADEC is concerned that these site conditions remain protective. *Please be advised that 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 **August 18, 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.

Sincerely,



Evonne Reese
Environmental Program Specialist
Institutional Controls Unit

Encl: Attachment B: Cleanup Complete-ICs Agreement and Signature Page – **High School** (blank copy)
Attachment B: Cleanup Complete-ICs Agreement and Signature Page – **Vo-Tech** (blank copy)
2014 Closure with Institutional Controls Determination (**High School**)
2014 Recorded Notice of Environmental Contamination (**High School**)
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 ZendTo "drop-off" option at <https://drop.state.ak.us/drop/>. The Division of SPAR/Contaminated Sites Program prefers and encourages electronic submittals.

Attachment B: Cleanup Complete-ICs Agreement and Signature Page*

Haines Borough agrees to the terms and Institutional Controls Conditions of the Closure with Institutional Controls Determination, as stated in the decision letter dated **April 8, 2014** for the Haines Borough High School; Hazard ID: 4219. Failure to comply with the terms and conditions of the determination may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380.

Signature of Authorized Representative, Title
Mr. Brad Ryan, Director of Haines Borough Public Facilities

Date

Printed Name of Authorized Representative, Title
Mr. Brad Ryan, Director of Haines Borough Public Facilities

Institutional Controls and Conditions

1. Any future change in land use may impact the exposure assumptions cited in the 2014 Closure with Institutional Controls Determination and 2014 Notice 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 owner of this site 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 foundation of the High School building and in the utility corridor (Drawing 1). When the High School building is 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.

Note to Responsible Person (RP): After making a copy for your records, please email a scanned, signed copy of this form to the ADEC project manager at the email address on this correspondence within 30 days of receipt of this letter. The Division of SPAR/Contaminated Sites Program prefers and encourages electronic submittals.

Attachment B: Cleanup Complete-ICs Agreement and Signature Page*

Haines Borough agrees to the terms and Institutional Controls Conditions of the Closure with Institutional Controls Determination, as stated in the decision letter dated **April 7, 2014** for the Haines Borough Vocational Technical School; Hazard ID: 26216. Failure to comply with the terms and conditions of the determination may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380.

Signature of Authorized Representative, Title
Mr. Brad Ryan, Director of Haines Borough Public Facilities

Date

Printed Name of Authorized Representative, Title
Mr. Brad Ryan, Director of Haines Borough Public Facilities

Institutional Controls and Conditions

1. Any future change in land use may impact the exposure assumptions cited in the 2014 Closure with Institutional Controls Determination and 2014 Notice 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 owner of this site shall submit a report to ADEC every three years to document land use, or report as soon as the Haines Borough 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 foundation of the Vo-Tech building and in the utility corridor (Drawing 1). When the Vocational Technical School building is 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 remaining groundwater monitoring wells must be decommissioned in accordance with ADEC guidance. Submit documentation to ADEC within 30 days of decommissioning the wells.
5. 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.
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

Note to Responsible Person (RP): After making a copy for your records, please email a scanned, signed copy of this form to the ADEC project manager at the email address on this correspondence within 30 days of receipt of this letter. The Division of SPAR/Contaminated Sites Program prefers and encourages electronic submittals.



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

410 Willoughby Ave Suite 303
PO Box 111800
Juneau, Alaska 99811-1800
Main: 907-465-5210
Fax: 907-465-5218

File No: 1508.38.017

April 8, 2014

Via Electronic and Regular Mail

Mr. Carlos Jimenez, Director
Haines Borough Public Works
Post Office Box 1209
Haines, Alaska 99827

RE: Closure with Institutional Controls Determination
Haines Borough High School Contaminated Site

Dear Carlos,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has reviewed the environmental records for the referenced site. This decision letter explains the site history, cleanup activity and specific conditions required to effectively manage any remaining contamination. No additional remedial action is required as long as compliance with these conditions is maintained.

Site Name and Location

Haines Borough High School
Haines Borough Offices
Haines, Alaska 99827
Tract A-2 Plat 2008-21

Address of Contact Party

Carlos Jimenez
Haines Borough Public Works
P.O. Box 1209
Haines, AK 99827

DEC Site Identifiers

Hazard ID: 4219
File: 1508.38.017

Regulatory Authority for Determination

Title 18 Alaska Administrative Code 75

Site Description and Background

The UST site is located on the north side of the Haines Borough High School building on Haines Highway Cut-off in downtown Haines. The surrounding properties in the area consist of municipal, commercial and residential land use. The nearest large surface water body is Portage Cove off Chilkoot Inlet, located about 0.3 miles to the west.

Site Description and Background

The referenced property is situated in an area of the Chilkat River floodplain that has a fine glacial till (clay) layer that constitutes a confining layer separating shallow groundwater from deep groundwater. The deep groundwater aquifer below the confining layer has a peizometric pressure gradient and may be of sufficient supply and quality to become a drinking water source. Shallow groundwater above the confining layer appears intermittently depending on rainfall and snowmelt from the mountains north of the Haines. Due to the influence of surface water the shallow aquifer is not of sufficient quality for use as a drinking water source. During summer, shallow groundwater is often not present for months at a time.

The Haines Borough provides drinking water to the area under a local public health ordinance that requires residents within 200 feet to make connection to the system. Site investigation has shown that subsurface water elevation on the properties varies seasonally between 8.5 and 13 feet below ground surface (BGS). Depth to bedrock in downtown Haines has been found to be less than twenty feet BGS. The predominant direction of groundwater flow on the property is southwest, toward the Chilkat River. Soil types on the property consist of alluvial and glacial sand and gravel overlain by imported construction fill.

In 2005, the Haines Borough (HB) was making plans to decommission the underground storage tanks (USTs) that supplied heating oil to boilers at four active school buildings. In advance of the project, the Borough made arrangements to investigate soil around each of the USTs for contamination. In October 2005, Carson Dorn Inc. (CDI) advanced test pits at the High School building and collected analytical samples test pits to characterize subsurface soil for diesel range (DRO) hydrocarbons. At the High School, DRO concentrations reached 3,840 milligrams per kilogram (mg/kg). DEC deferred further characterization and cleanup activities until the tanks were no longer in use and listed the property on the Contaminated Sites Database.

Contaminants of Concern

The following petroleum contaminants of concern (COCs) are those above cleanup levels that were identified during the course of the site investigations, as summarized in the Characterization and Cleanup Activities section of this decision letter.

- Diesel Range Hydrocarbons (DRO)

Cleanup Levels

Site investigation sampling detected elevated concentrations of DRO in confirmation samples of subsurface soil at the High School UST site. The migration to groundwater soil cleanup levels are applicable in this situation to limit DRO soil contamination from migrating into shallow groundwater, if present. As previously stated, groundwater in the area is intermittent and was not encountered during two site investigations of the site. Surface water is not present at the site and was not investigated for contamination.

The cleanup level requirements for heating oil contamination in soil and groundwater on the property are those established in 18 AAC 75.341(b)(2) Method Two for soil with chemicals listed on 18 AAC 75.341(c) Table B1 and petroleum hydrocarbon ranges listed on 18 AAC 75.341(d) Table B2 for the over 40 inch rainfall zone for soil, and those established in 18 AAC 75.345(b)(1) on Table C for groundwater. The following table displays the contaminant of concern cleanup levels for completed pathways at this site:

Table 1 – Approved Cleanup Levels

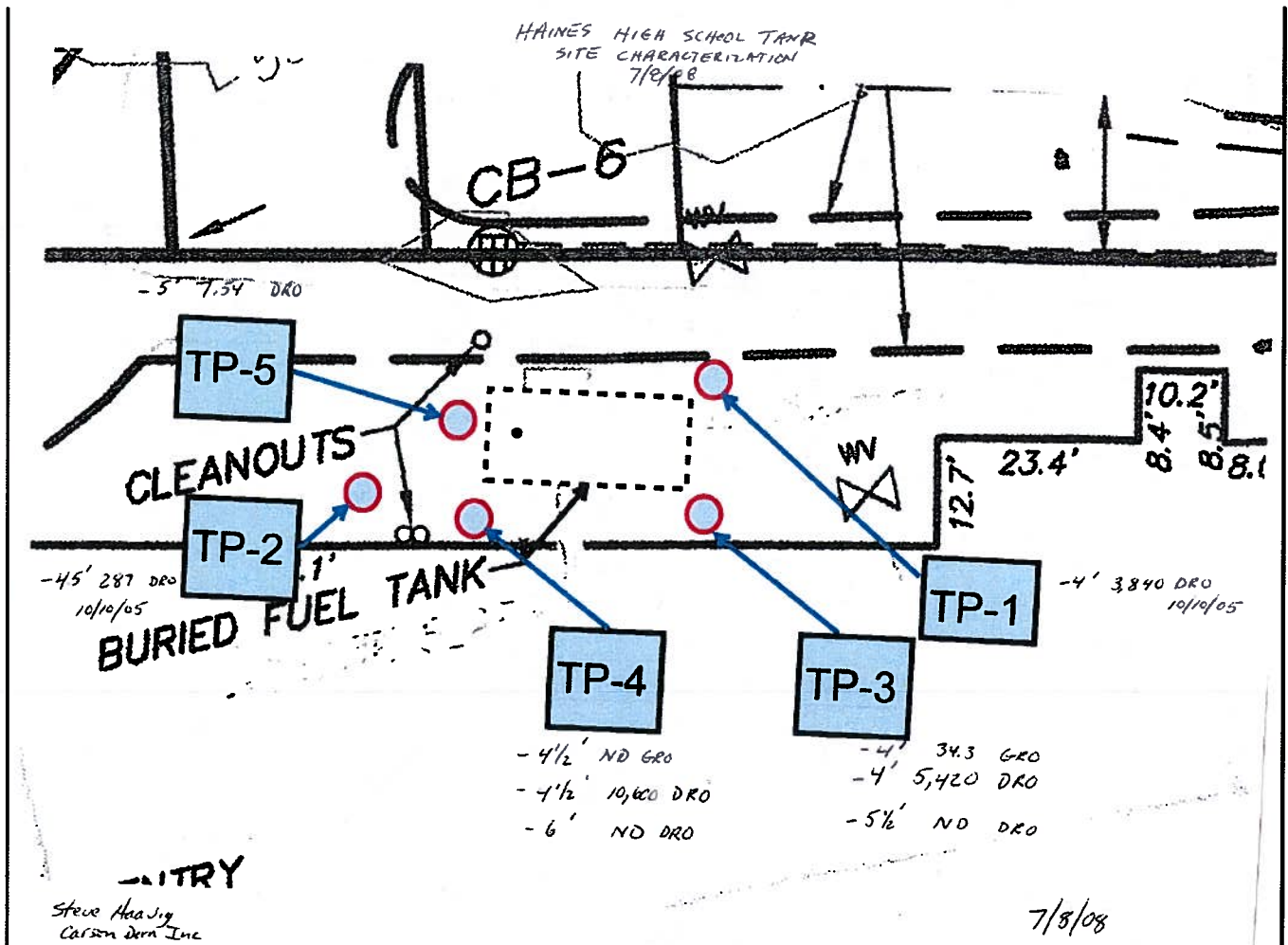
Chemical	Soil (mg/kg) Migration to Groundwater	Groundwater (mg/L)
DRO	230	1.5

Site Characterization and Cleanup Activities

Site Investigation and Cleanup activities conducted under the regulatory authority of the Contaminated Sites Program (DEC) began in 2006. By letter in March 2006, DEC approved a Site Investigation Report for the limited site activity in 2005 by CDI and agreed to allow the Haines Borough (HB) to delay cleanup activities until the USTs were no longer in-use by the School District. These activities are described below.

In October 2005, CDI began a site investigation of subsurface soil near the 6,000-gallon UST located under gravel surface soil on the north side of the high school among a network of buried utilities.

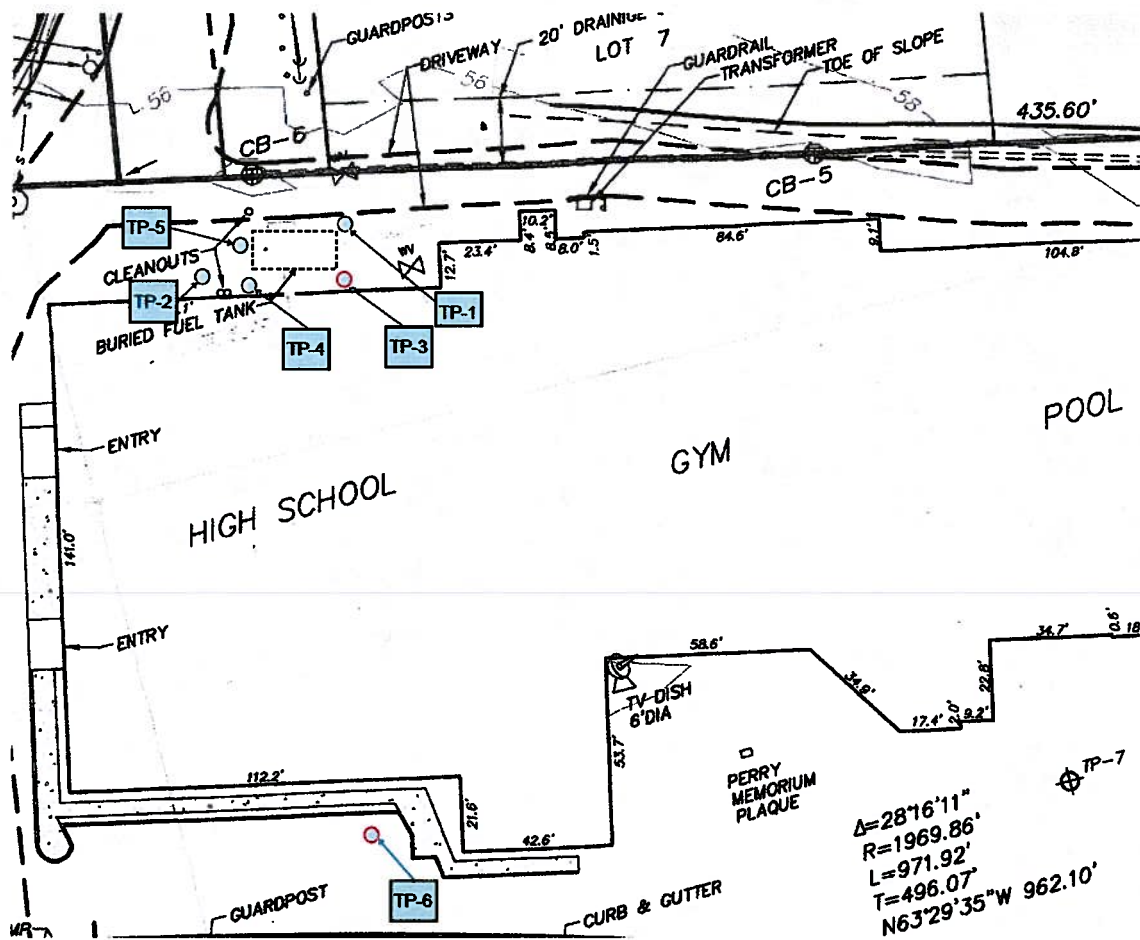
Drawing 1 From the 2008 Report: utility corridor at the northeast corner of the High School building.



CDI observed no stains on surface soil above the tank that might indicate fuel handling spills and advanced test pits TP-1 and TP-2 carefully to avoid disturbing the complex network of buried utility lines surrounding the UST site. In test pit #1, advanced at the northeast corner of the UST, CDI observed petroleum stained soil in a layer between 3.5 and 4.5 feet BGS. Below that soil layer CDI observed clean native soil down to the final excavation depth of 10.5 feet BGS. The DRO concentration in a sample from this stained soil layer was 3,840 milligrams per kilogram (mg/kg). Test pit #2 located west of the UST had similar soil types at the same depths but the stained soil was narrowed to a layer between 4 and 4.5 feet BGS. The DRO concentration in a sample from this stained soil layer was 287 mg/kg.

Based on the findings of the 2005 CDI letter report (Report), DEC approved a work plan submitted by CDI to advance additional test pits at the High School UST site to further characterize the soil for contamination. On July 8, 2008, CDI collected samples from test pits TP-3 through TP-6 advanced in locations displayed in Drawings 1 and 2. In the Report CDI stated they observed staining in a thin layer of grey sandy gravel surrounding the UST at a depth of between 3.5 and to 4.5 feet BGS. The dense till underneath the sandy gravel was not contaminated, nor is the brown sandy gravel above it. CDI collected a sample from test pit TP-6 on the south side of the high school from a depth of six feet BGS to confirm that contamination does not extend south to that point. Groundwater was not encountered and was not investigated.

Drawing 2 High School UST closed in-place with locations of 2005 & 2008 Test Pits (TP-1 thru TP-6)



Analytical concentrations of benzene, toluene, ethylbenzene and total xylene (BTEX) and polyaromatic hydrocarbon (PAH) compounds in soil confirmation samples from the test pits were below laboratory reporting limits and Method Two Migration to Groundwater (M2 MTG) regulatory cleanup levels. The highest concentrations of DRO were detected in samples from test pits TP-3 and TP-4 nearest the building foundation. The Report did not provide a recommended estimate of the volume of contaminated soil potentially remaining at the site.

The following table (Table 1) displays the highest concentration of DRO detected in soil remaining at the site after the two site investigations, the depth below the surface that each sample was taken, and the M2 MTG and Direct Contact/Ingestion soil cleanup levels listed in 18 AAC 75.341 Table B1 and Table B2. The result in bold is above the approved M2 MEG soil cleanup level.

Table 1 highest level of petroleum analytes detected in remaining soil at the High School site.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg	M2 Direct Contact/Ingestion Cleanup Levels mg/kg
DRO	10,600	Sample TP4 at 4.5 feet	230	8250

mg/kg = milligrams per kilogram

In July 2008, DEC met with the Haines Borough officials at municipal offices in Haines. The objective was to discuss the results of sampling and work out an acceptable cleanup remedy. DEC determined that information on the site to date was sufficient to allow the Haines Borough to drain, clean and close the High School UST in-place and then cap the site with asphalt.

In a letter report dated August 2008, the HB reported to DEC that after closing the UST in-place in accordance with DEC standards, Southeast Road Builders paved the site with asphalt to limit infiltration of water from the surface. HB did not provide an estimate of the volume of contaminated soil remaining at the site in the letter report. DEC approved the letter report and agreed to establish institutional controls on the site. Based upon the information in Drawings 1 and 2 which show the location of the UST and sampling locations and the high school building foundation, DEC agreed to consider the site for a closure determination.

Cumulative Health Risk Calculation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be calculated. The risk from hazardous substances must not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative non-carcinogenic risk standard at a hazard index of one across all exposure pathways. A chemical that is detected at one-tenth or more of the Table B1 inhalation or ingestion values set out in 18 AAC 75.341(c) or the Table B2 values set out in 18 AAC 75.341(d) must be included when calculating cumulative risk under 18 AAC 75.325(g).

Based on a review of the environmental record, DEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1 as Attachment A to this letter.

DEC Decision

In accordance with 18 AAC 75.335 (b) (2), the concentration and extent of contamination has been determined to the maximum extent practicable at the UST site as referenced in this decision document. Soil contamination remaining in a subsurface soil layer on the referenced property is limited, stable and does not present an unacceptable risk to human health or the environment.

The department approves closure for this site in accordance with 18 AAC 75.380, subject to institutional controls under 18 AAC 75.375, as outlined below. These controls are necessary to ensure that soil contamination encountered during construction or other disturbances in the future is properly managed, and that current and future landowners or operators on the impacted properties are notified and aware.

Institutional Controls

Since petroleum contamination remains in subsurface soil on the referenced property above approved cleanup levels, institutional controls are necessary to ensure there is no unacceptable risk to human health or the environment, now and in the future. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office as an institutional control (IC) that identifies the nature and extent of contamination at the property as described in this decision document and the conditions that current and future owners and operators are subject to in accordance with this decision document. These conditions are as follows:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, these management conditions may not be protective and DEC may require additional remediation and revised conditions. Therefore the Haines Borough or any future landowner shall report to DEC every three years to document land use, or report as soon as the Haines Borough or a future landowner/operator becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local DEC office or electronically to DEC.ICUnit@alaska.gov
2. Sub-surface soil contamination is located near the foundation of the High School building utility corridor (Drawing 1). When the High School building is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with a DEC approved work plan.
3. Installation of groundwater wells will require approval from DEC
4. Any proposal to transport soil or groundwater off-site requires DEC approval in accordance with 18 AAC 7.325(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 DEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. Institutional controls will be removed in the future if documentation can be provided that shows cleanup levels have been met. Management conditions 4 and 5 remain in effect after ICs 1-3 are removed.

This determination is in accordance with 18 AAC 75.380 and does not preclude DEC 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 99801, 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 99801, 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.

Please sign and return *Attachment B* to DEC within 30 days of receipt of this letter. If you have any questions or concerns with agreeing to the terms of this site closure agreement or about this closure decision, please contact the DEC project manager, Bruce Wanstall at (907) 465-5210.

Sincerely,



Bruce Wanstall
Remedial Project Manager
State & Private Contaminated Sites Program

Attachment A: Table 1 – Exposure Pathway Evaluation
Attachment B: Cleanup Complete-ICs Agreement and Signature Page*
Attachment C: Plat Map

cc: Julie Cozzi, Interim Borough Manager, Haines, via email, jcozzi@haines.ak.us
Sally Schlichting, DEC Project Manager, via email
Carol Russell, Response Fund Administration, via email
Evonne Reese, DEC IC Unit, via email

Attachment A: Exposure Pathway Evaluation

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	There is no soil contamination at the surface on the site above the migration to groundwater and ingestion cleanup levels.
Sub-Surface Soil Contact	Exposure controlled	Soil contamination remains not accessible in the subsurface at levels above human health ingestion levels and future excavation is not allowed without submitting a work plan for DEC approval prior to beginning any work.
Inhalation – Outdoor Air	Pathway Incomplete	Volatile petroleum compounds are not present in soil contamination remaining in the subsurface.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Buildings are present but any remaining volatile petroleum levels in groundwater are below laboratory reporting limits and Table C cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Haines Borough supplies potable water to the site and the general area. Groundwater was not encountered and was not investigated for contamination.
Surface Water Ingestion	Pathway Incomplete	Surface water hydraulically connected to the site is not of sufficient quality or quantity for a potable water source.
Wild Foods Ingestion	Pathway Incomplete	The site and the urban area are not a wild foods harvest area and none of the contaminants have potential to bioaccumulate in flora or fauna.
Exposure to Ecological Receptors	Pathway Incomplete	Ecological receptors are not be present at the site or in the urban area.

Notes to Table 1: “De-minimis exposure” means that in DEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in DEC’s judgment contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

Attachment B: Cleanup Complete-ICs Agreement and Signature Page*

Haines Borough agrees to the terms and conditions of this Cleanup Complete Determination, as stated in this decision letter for the Haines Borough High School property, dated April 8, 2014. Failure to comply with the terms and conditions of the determination may result in DEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380.

Signature of Authorized Representative, Title
Carlos Jimenez

Date

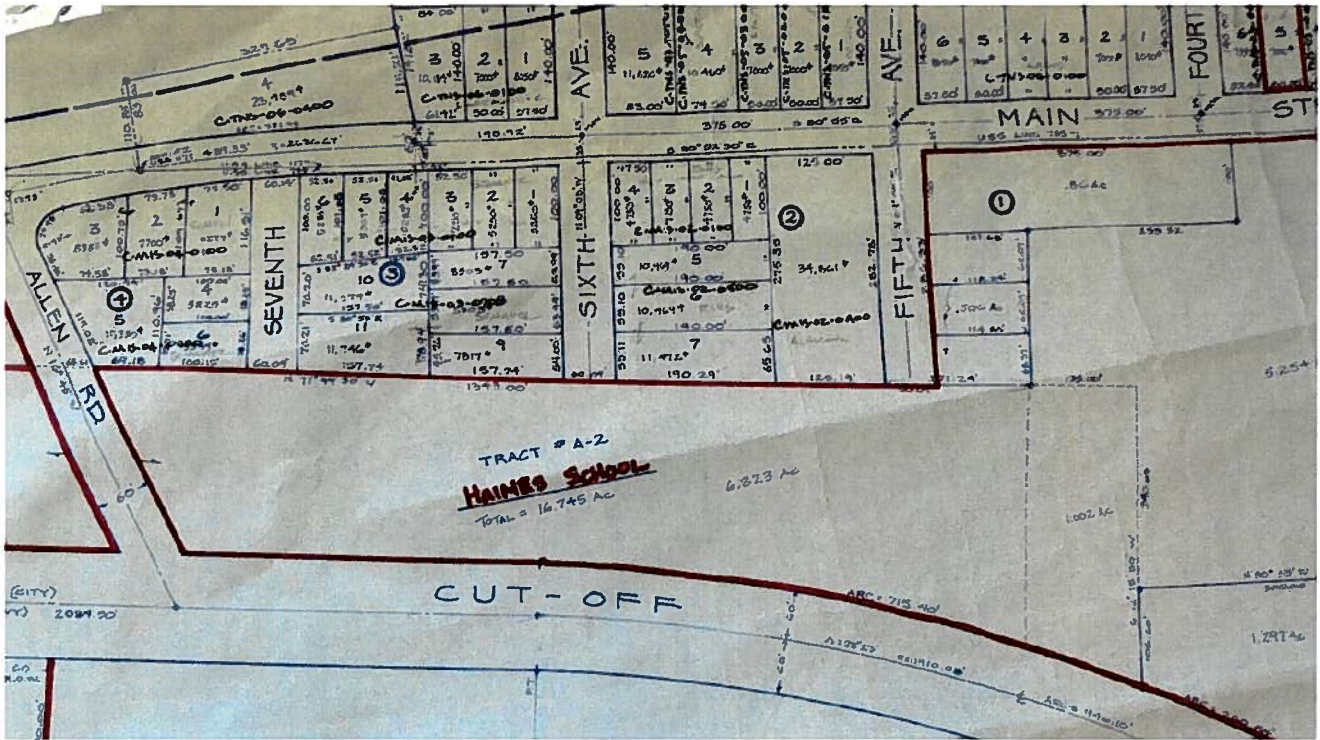
Printed Name of Authorized Representative, Title
Haines Borough

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the DEC project manager at the address on this correspondence within 30 days of receipt of this letter.

Attachment C

Old School Plat Map: the High School building UST site is located at the south end of Sixth Avenue.



cc

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A
S
K
A

2014-000131-0

Recording District 106 Haines

04/15/2014 09:21 AM Page 1 of 4



NOTICE OF ENVIRONMENTAL CONTAMINATION

Recording District: Haines
Official State Business – No Charge

As required by the Alaska Department of Environmental Conservation, Grantor, pursuant to 18 AAC 75.375 Borough of Haines, Grantee, as the owner and operator of the subject property, hereby provides public notice that the property located at between the Haines Highway Cut-off and Main Street in Haines, Alaska, 99827, and more particularly described as follows:

Tract A-2, Presbyterian Mission Plat (Subdivision of A Fraction of USS No. 735)

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 75, Article 3, as amended October 9, 2008. This release and cleanup are documented in the Alaska Department of Environmental Conservation contaminated sites database at <http://dec.alaska.gov/spar/csp/index.htm> under Hazard ID number 4219.

DEC has reviewed and approved the site cleanup as protective of human health, safety, welfare and the environment, subject to the institutional control specified in this letter. No further cleanup is necessary at this site unless new information becomes available indicating to DEC that the site may pose an unacceptable risk to human health, safety, welfare or the environment.

The property is subject to conditions in order to ensure contamination left onsite remains undisturbed unless a cleanup effort is initiated with the prior approval from DEC. These conditions are as follows:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use zoning and/or ownership changes, these management conditions may not be protective and DEC may require additional remediation and revised conditions. Therefore the Haines Borough and any future property owner of this site shall submit a report to DEC 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 DEC office or electronically to DEC.ICUnit@alaska.gov
2. Sub-surface soil contamination is located near the foundation of the High School building in the utility corridor (Drawing 1). When the High School building is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with a DEC approved work plan.

3. Installation of groundwater wells will require approval from DEC.
4. Any proposal to transport soil or groundwater off-site requires DEC approval in accordance with 18 AAC 7.325(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 following describes the location, type and levels of contaminated soil remaining on site.

Analytical results of DEC-approved Site Investigations performed in 2005 and 2008 indicate that contaminated soil remains surrounding a 6,000-gallon underground heating oil storage tank closed in-place at the site. The tank is located in a utility corridor on the north side of the northwest corner of a Haines Borough High School building on Haines Highway Cut-off. Drawing 1 and Drawing 2 from the Site Investigation Reports are attached for reference. Subsurface soil contamination is present in a grey sandy gravel layer at depths between 3.5 and 4.5 feet below the ground surface.

Pursuant to 18 AAC 75.325(i)(1) and (2), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-.370. At this site, in the future, if soil is removed from the site or groundwater is brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time.

This NEC remains in effect until a written determination from is recorded that states that soil and/or groundwater at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and/or groundwater meets the cleanup levels in Table C in 18 AAC 75.345 and that off-site transportation of soil and/or groundwater is not a concern.

This document will be filed in the Juneau recording district.

Return to-

Signature: _____



Printed Name:

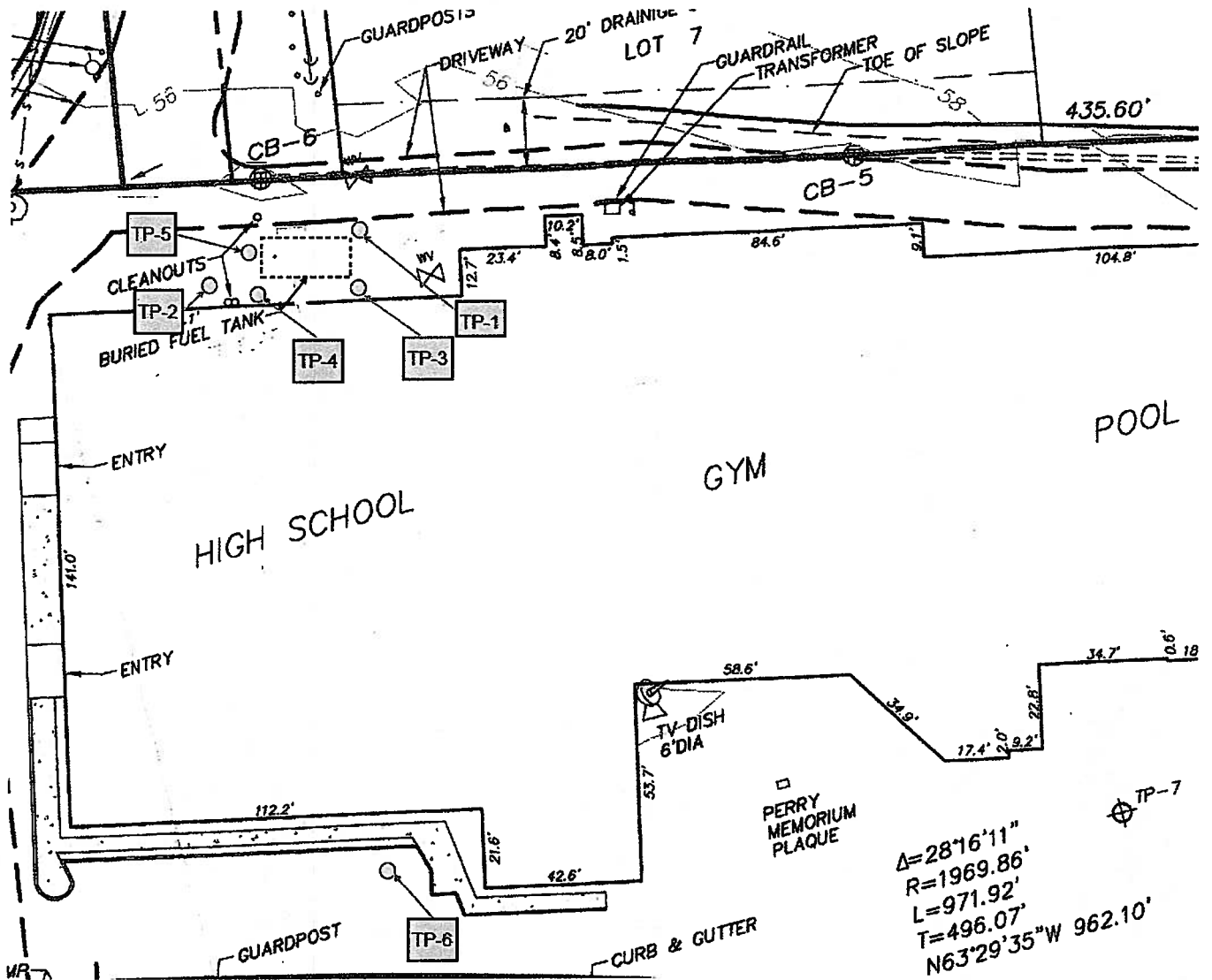
Evonne Reese, EPS III
Institutional Controls Unit
Contaminated Sites Program / Spill Prevention and Response Division
Department of Environmental Conservation

Mailing Address:

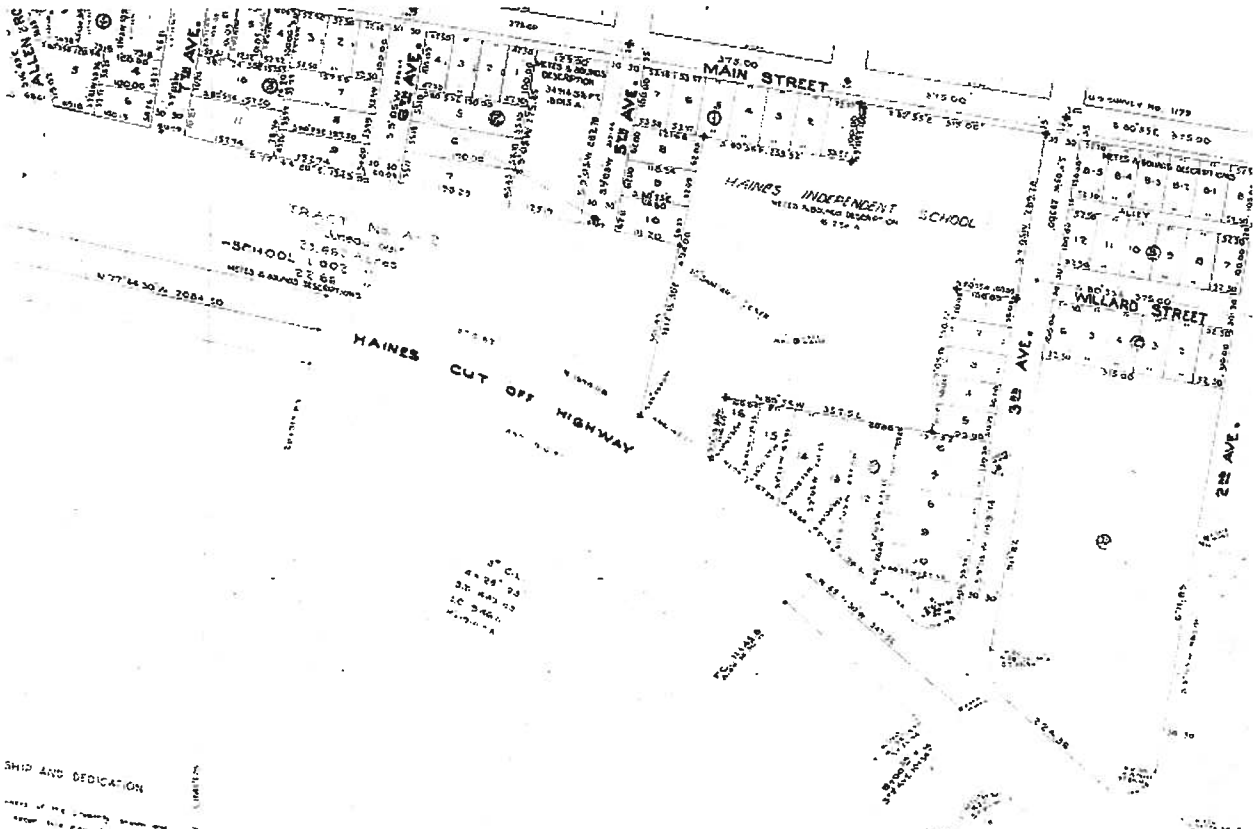
P.O. Box 111800
Juneau, AK 99811-1800



Drawing 1 High School UST closed in-place with locations of 2005 & 2008 Test Pits (TP-1 thru TP-6)



Drawing 2 Old School Plat Map: UST site at the south end of Sixth Avenue at the red line in Tract A-2



SHIP AND DEDICATION
 I hereby certify that the Subdivision shown herein has been found to comply with the Subdivision Regulations of the County of...
 City of...
 August 19, 1937

CERTIFICATE OF APPROVAL BY THE BOARD
 I hereby certify that the Subdivision shown herein has been found to comply with the Subdivision Regulations of the County of...
 City of...
 August 19, 1937

CERTIFICATE OF APPROVAL BY THE BOARD
 I hereby certify that the Subdivision shown herein has been found to comply with the Subdivision Regulations of the County of...
 City of...
 August 19, 1937

PRESBYTERIAN MISSION PLAT
 SUBDIVISION OF
 A FRACTION OF
 U.S. SURVEY NO. 735
 SCALE 1"=100'
 AUGUST 19-1937
 W. MURKASTER, REGISTERED



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

410 Willoughby Ave Suite 303
PO Box 111800
Juneau, Alaska 99811-1800
Main: 907-465-5210
Fax: 907-465-5218

File No: 1508.38.017

April 7, 2014

Via Electronic and Regular Mail

Mr. Carlos Jimenez, Director
Haines Borough Public Works
Post Office Box 1209
Haines, Alaska 99827

RE: Closure with Institutional Controls Determination
Haines Borough Vocational Technical School Contaminated Site

Dear Carlos,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has reviewed the environmental records for the referenced site. This decision letter explains the site history, cleanup activity and specific conditions required to effectively manage any remaining contamination. No additional remedial action is required as long as compliance with these conditions is maintained.

Site Name and Location

Haines Borough School District USTs
Haines Borough Offices
Haines, Alaska 99827
Lots 5, Primary School Subdivision Plat 2008-21

Address of Contact Party

Carlos Jimenez
Haines Borough Public Works
P.O. Box 1209
Haines, AK 99827

DEC Site Identifiers

Hazard ID: 26216
File: 1508.38.017

Regulatory Authority for Determination

Title 18 Alaska Administrative Code 75

Site Description and Background

The Haines Borough Vocational Technical School (Vo-Tech) building UST property is located on Haines Highway Cut-off between Fifth Avenue and Allen Road in downtown Haines. The surrounding properties consist of municipal, commercial and residential land use. The nearest large surface water body is Portage Cove off Chilkoot Inlet, located about 0.3 miles to the west.

Site Description and Background

The referenced property is situated in an area of the Chilkat River floodplain that has a fine glacial till (clay) layer that constitutes a confining layer separating shallow groundwater from deep groundwater. The deep groundwater aquifer below the confining layer has a peizometric pressure gradient and may be of sufficient supply and quality to become a drinking water source. Shallow groundwater above the confining layer appears intermittently depending on rainfall and snowmelt from the mountains north of the Haines. Due to the influence of surface water the shallow aquifer is not of sufficient quality for use as a drinking water source. During summer, shallow groundwater is often not present for months at a time.

The Haines Borough provides drinking water to the area under a local public health ordinance that requires residents within 200 feet to make connection to the system. Site investigation has shown that subsurface water elevation on the properties varies seasonally between 8.5 and 13 feet below ground surface (BGS). Depth to bedrock in downtown Haines has been found to be less than twenty feet BGS. The predominant direction of groundwater flow on the property is southwest, toward the Chilkat River. Soil types on the property consist of alluvial and glacial sand and gravel overlain by imported construction fill.

In 2005, the Haines Borough (HB) was making plans to decommission the underground storage tanks (USTs) that supplied heating oil to boilers at four active school buildings. In advance of the project, the Borough made arrangements to investigate soil around each of the USTs for contamination. In October 2005, Carson Dorn Inc. (CDI) advanced test pits at the Vo-Tech building and collected analytical samples from each test pit to characterize subsurface soil for diesel range (DRO) hydrocarbons. At the Vo-Tech school, DRO concentrations reached 5,430 milligrams per kilogram (mg/kg). Since HB intended to decommission the UST over the next several years DEC deferred further characterization and cleanup activities until the tanks were no longer in use and listed the property on the Contaminated Sites Database.

Contaminants of Concern

The following petroleum contaminants of concern (COCs) are those above cleanup levels that were identified during the course of the site investigations, as summarized in the Characterization and Cleanup Activities section of this decision letter.

- Diesel Range Hydrocarbons (DRO)

Cleanup Levels

Site investigation sampling detected elevated concentrations of DRO in confirmation samples of subsurface soil at the Vocational Technical School UST site. The migration to groundwater soil cleanup levels are applicable in this situation to limit DRO soil contamination from migrating into shallow groundwater. As previously stated, groundwater is intermittent at the site and was investigated for contamination. Surface water is not present at the site and was not investigated for contamination.

The cleanup level requirements for heating oil contamination in soil and groundwater on the property are those established in 18 AAC 75.341(b)(2) Method Two for soil with chemicals listed on 18 AAC 75.341(c) Table B1 and petroleum hydrocarbon ranges listed on 18 AAC 75.341(d) Table B2 for the over 40 inch rainfall zone for soil, and those established in 18 AAC 75.345(b)(1) on Table C for groundwater. The following table displays the contaminant of concern cleanup levels for completed pathways at this site:

Table 1 – Approved Cleanup Levels

Chemical	Soil (mg/kg) Migration to Groundwater	Groundwater (mg/L)
DRO	230	1.5

Site Characterization and Cleanup Activities

Site Investigation and Cleanup activities conducted under the regulatory authority of the Contaminated Sites Program (DEC) began in 2006. By letter in March 2006, DEC approved a Site Investigation Report for the limited site activity in 2005 by CDI and agreed to allow the Haines Borough (HB) to delay cleanup activities until school buildings were no longer in-use by the School District. These activities are described below.

Based on the previous findings, in 2007 DEC approved a work plan submitted by CDI for HB to perform Interim Removal (IR) excavation of the accessible contaminated soil while protecting the integrity of the school building structures. Remediation of contaminated soil from the IR activity was performed either by off-site transport to an out-of-state remedial landfill or by enhanced natural attenuation in a bioremediation cell (biocell) at the Haines Borough Wastewater Treatment Plant (WTP) to acceptable regulatory levels.

The 2005 preliminary site investigation found a DRO concentration of 5,430 mg/kg in soil at a depth of six feet BGS in an excavation on the east side of the UST at the referenced site. In June 2007, during the closure-by-removal of the 1,000-gallon UST located at the northeast corner of the school, soil layers consisted of gravel between zero and two feet, sand/gravel between two and four feet and compact till between four and to eight feet BGS.



UST at the northeast corner of the Vo-Tech building; subsurface clay layer and groundwater seep.

The upper layer of soil above the UST surrounding the fill and vent pipes was clean so it was set aside. After HB removed the UST, CDI tracked stained layer of soil contamination to the edge of the building foundation and in a subsurface layer of stained soil under an abandoned utility pipe that extended northeast towards the high school. Workers loaded contaminated soil directly into trucks for transport to

the WTP biocell. In accordance with the DEC approved sampling work plan CDI collected eight confirmation samples and a field duplicate from remaining soil on the bottom and sidewalls of the excavation at the water/soil interface.



Stained grey soil layer in the north wall and groundwater monitor well emerging from clean backfill soil.

Samples collected beneath the tank (VT-1) at eight feet BGS and south of the tank (VT-2) at seven feet BGS had DRO concentrations in soil below laboratory reporting limits. Three samples collected from the west wall (VT-4, VT-5, & VT-6) at six, seven and three feet BGS respectively had DRO concentrations of 34 mg/kg, 2,200 mg/kg and below laboratory reporting limits respectively. The sample collected at the Vo-Tech foundation on the north side (VT-3) had a DRO concentration of 3,330 mg/kg.

The following table displays the highest levels of COCs detected in samples of remaining soil, the sample name, the depth below the surface and where the sample was collected, and the Method Two Migration to Groundwater (M2 MTG soil cleanup levels listed in 18 AAC 75.341 Table B1 and Table B2. The values in bold print are above the M2 MTG cleanup levels.

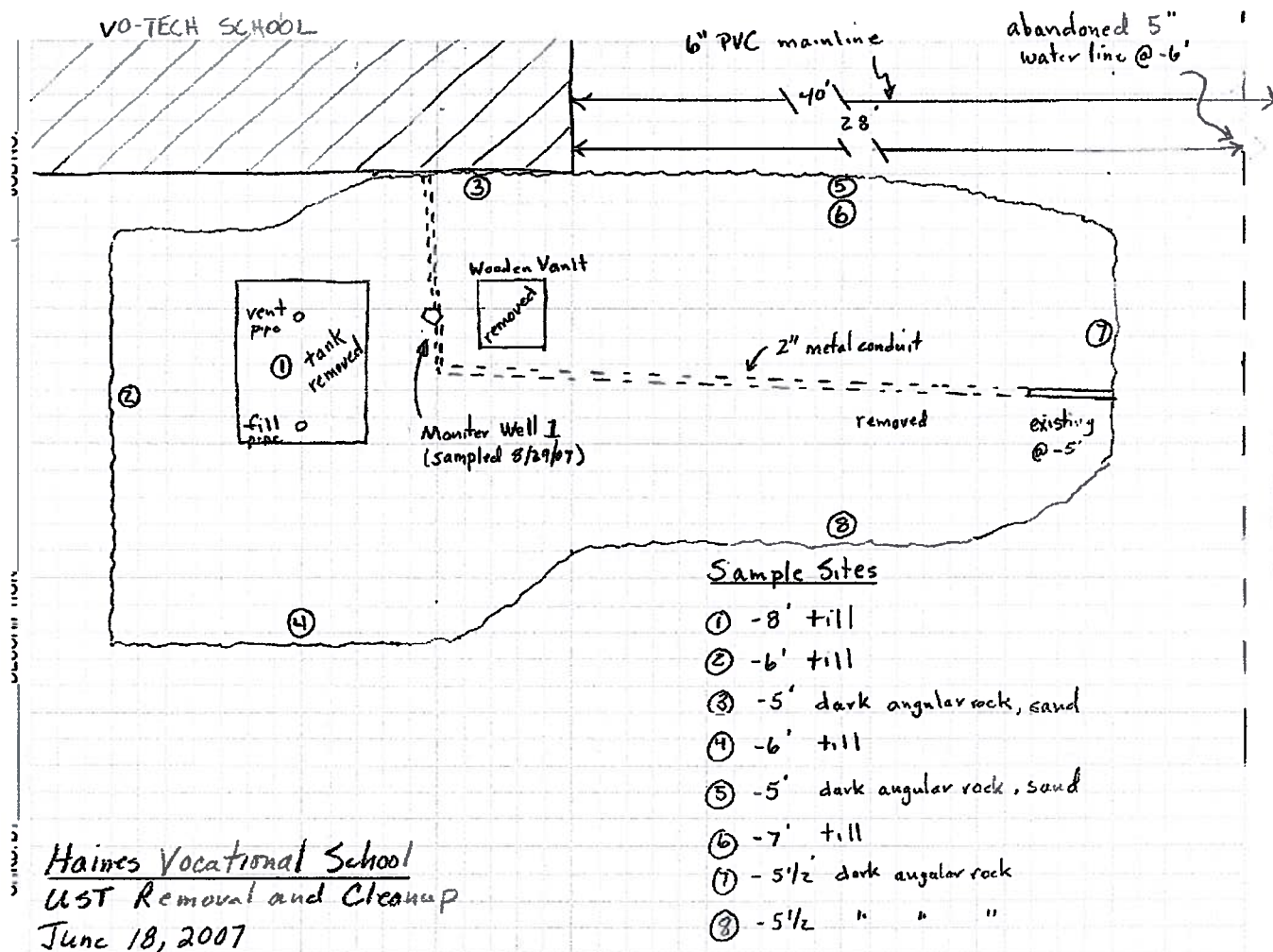
Table 2 highest level of petroleum analytes in confirmation soil samples.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
DRO	3,300	VT-3 at 5 feet BGS at the building foundation	230
Benzene	NT		0.025

mg/kg = milligrams per kilogram

NT = not tested

Continued excavation of contaminated soil in the UST excavation is restricted by a water service utility line and the foundation of the Vo-Tech School building. While HB returned clean surface soil to the excavation, CDI installed a groundwater well in the excavation.



Drawing 1 with sample locations in the Vo-Tech former UST excavation.

Confirmation sample data indicate that DRO contamination remains in a soil layer averaging less than 24 inches thick at a depth between five and seven feet BGS underneath the footing of the Vo-Tech school and extending northward for 15-20 feet along both sides of a buried 2-inch steel conduit water pipe. An estimated volume of forty cubic yards of lightly contaminated soil originating from the Vo-Tech UST excavation was transported to the WTP where it was placed in a lined biocell and treated with nutrients to accelerate microbial breakdown of petroleum in the soil. In September 2007, the heavily contaminated soil was transported by barge in shipping containers to the Rabanco Landfill located in Washington State.

In August 2007, CDI collected a groundwater sample and a field duplicate from the monitoring well for laboratory analysis. The samples were analyzed for DRO and benzene, toluene, ethylbenzene and total xylenes (BTEX). Benzene and DRO concentrations are displayed in Table 3 below. Each result is below the approved cleanup levels also displayed in Table 3. The toluene, ethylbenzene and total xylene compound concentrations were each below laboratory reporting limits and approved Table C cleanup levels.

Table 3 Analyte concentrations detected in groundwater

Analyte	MW-1 mg/L	MW-1 Duplicate mg/L	Cleanup Level mg/L
DRO	0.315	NS	1.5
Benzene	0.0003	0.0002	0.005

mg/L = milligrams per liter

NS = not sampled

In a letter dated October 2007, DEC approved findings in the final report stating that DRO soil contamination is present under the northeast corner of the foundation of the Vo-Tech school building extending twenty feet north in a narrow utility trench. DEC confirmed that when the transport for remediation of contaminated soil was confirmed then closure with institutional controls was possible. Remaining soil contamination at the Vo-Tech school building site is indicated in Drawing 1. Remediation of the contaminated soil was later confirmed by DEC.

Cumulative Health Risk Calculation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be calculated. The risk from hazardous substances must not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative non-carcinogenic risk standard at a hazard index of one across all exposure pathways. A chemical that is detected at one-tenth or more of the Table B1 inhalation or ingestion values set out in 18 AAC 75.341(c) or the Table B2 values set out in 18 AAC 75.341(d) must be included when calculating cumulative risk under 18 AAC 75.325(g).

Based on a review of the environmental record, DEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1 as Attachment A to this letter.

DEC Decision

In accordance with 18 AAC 75.335 (b) (2), the concentration and extent of contamination has been determined to the maximum extent practicable at the former UST site as referenced in this decision document. Soil contamination remaining in a subsurface soil layer on the referenced property is limited, stable and does not present an unacceptable risk to human health or the environment.

Groundwater monitoring demonstrates that the thin zone of contamination is not impacting groundwater. The department approves closure for this site in accordance with 18 AAC 75.380, subject to institutional controls under 18 AAC 75.375, as outlined below. These controls are necessary to ensure that soil contamination encountered during construction or other disturbances in the future is properly managed, and that current and future landowners or operators on the impacted properties are notified and aware.

Institutional Controls

Since petroleum contamination remains in subsurface soil on the referenced property above approved cleanup levels, institutional controls are necessary to ensure there is no unacceptable risk to human health or the environment, now and in the future. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office as an institutional control (IC) that identifies the nature and extent of contamination at the property as described in this decision document and the conditions that current and future owners and operators are subject to in accordance with this decision document. These conditions are as follows:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, these management conditions may not be protective and DEC may require additional remediation and revised conditions. Therefore the Haines Borough shall report to DEC every three years to document land use, or report as soon as the Haines Borough becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local DEC office or electronically to DEC.ICUnit@alaska.gov
2. Sub-surface soil contamination is located near the foundation of the Vo-Tech building and in the utility corridor (Drawing 1). When the Vocational Technical School building is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with a DEC approved work plan.
3. Installation of groundwater wells will require approval from DEC
4. Any remaining groundwater monitoring wells must be decommissioned in accordance with DEC guidance. Submit well decommissioning documentation to DEC within 30 days.
5. Any proposal to transport soil or groundwater off-site requires DEC approval in accordance with 18 AAC 7.325(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.
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

The DEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. Institutional controls will be removed in the future if documentation can be provided that shows cleanup levels have been met. Management conditions 5 and 6 remain in effect after ICs 1-4 are removed.

This determination is in accordance with 18 AAC 75.380 and does not preclude DEC 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.

April 7, 2014

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 99801, 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 99801, 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.

Please sign and return *Attachment B* to DEC within 30 days of receipt of this letter. If you have any questions or concerns with agreeing to the terms of this site closure agreement or about this closure decision, please contact the DEC project manager, Bruce Wanstall at (907) 465-5210.

Sincerely,



Bruce Wanstall
Remedial Project Manager
State & Private Contaminated Sites Program

Attachment A: Table 1 – Exposure Pathway Evaluation
Attachment B: Cleanup Complete-ICs Agreement and Signature Page*
Attachment C: Site Map

cc: Julie Cozzi, Interim Borough Manager, Haines, via email, jcozzi@haines.ak.us
Sally Schlichting, DEC Project Manager, via email
Carol Russell, Response Fund Administration, via email
Evonne Reese, DEC IC Unit, via email

Attachment A: Exposure Pathway Evaluation

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	There is no soil contamination remaining at the surface on the site above the direct contact cleanup levels. All excavated soil contamination has been transported off-site and remediated.
Sub-Surface Soil Contact	De-minimis exposure	Soil contamination remains not accessible in the subsurface at levels between Method Two Table B2 Migration to Groundwater and human health ingestion levels and future excavation is not planned.
Inhalation – Outdoor Air	Pathway Incomplete	Soil was not tested for volatile petroleum compounds and contamination remains in the subsurface, but no volatile compounds are present in groundwater.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Buildings are present but any remaining volatile petroleum levels in groundwater are below laboratory reporting limits and Table C cleanup levels.
Groundwater Ingestion	De minimis exposure	Petroleum levels in groundwater are below Table C cleanup levels and groundwater does not influence a current or future drinking water source. Public Works supplies potable water to the site and the general area.
Surface Water Ingestion	Pathway Incomplete	Surface water hydraulically connected to the site is not of sufficient quality or quantity for a potable water source.
Wild Foods Ingestion	Pathway Incomplete	The site and the urban area are not a wild foods harvest area and none of the contaminants have potential to bioaccumulate in flora or fauna.
Exposure to Ecological Receptors	Pathway Incomplete	Groundwater samples are below the Table C cleanup levels.

Notes to Table 1: “De-minimis exposure” means that in DEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in DEC’s judgment contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

Attachment B: Cleanup Complete-ICs Agreement and Signature Page*

Haines Borough agrees to the terms and conditions of this Cleanup Complete Determination, as stated in decision letter for the Vocational Technical School, dated April 7, 2014. Failure to comply with the terms and conditions of the determination may result in DEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380.

Signature of Authorized Representative, Title
Carlos Jimenez

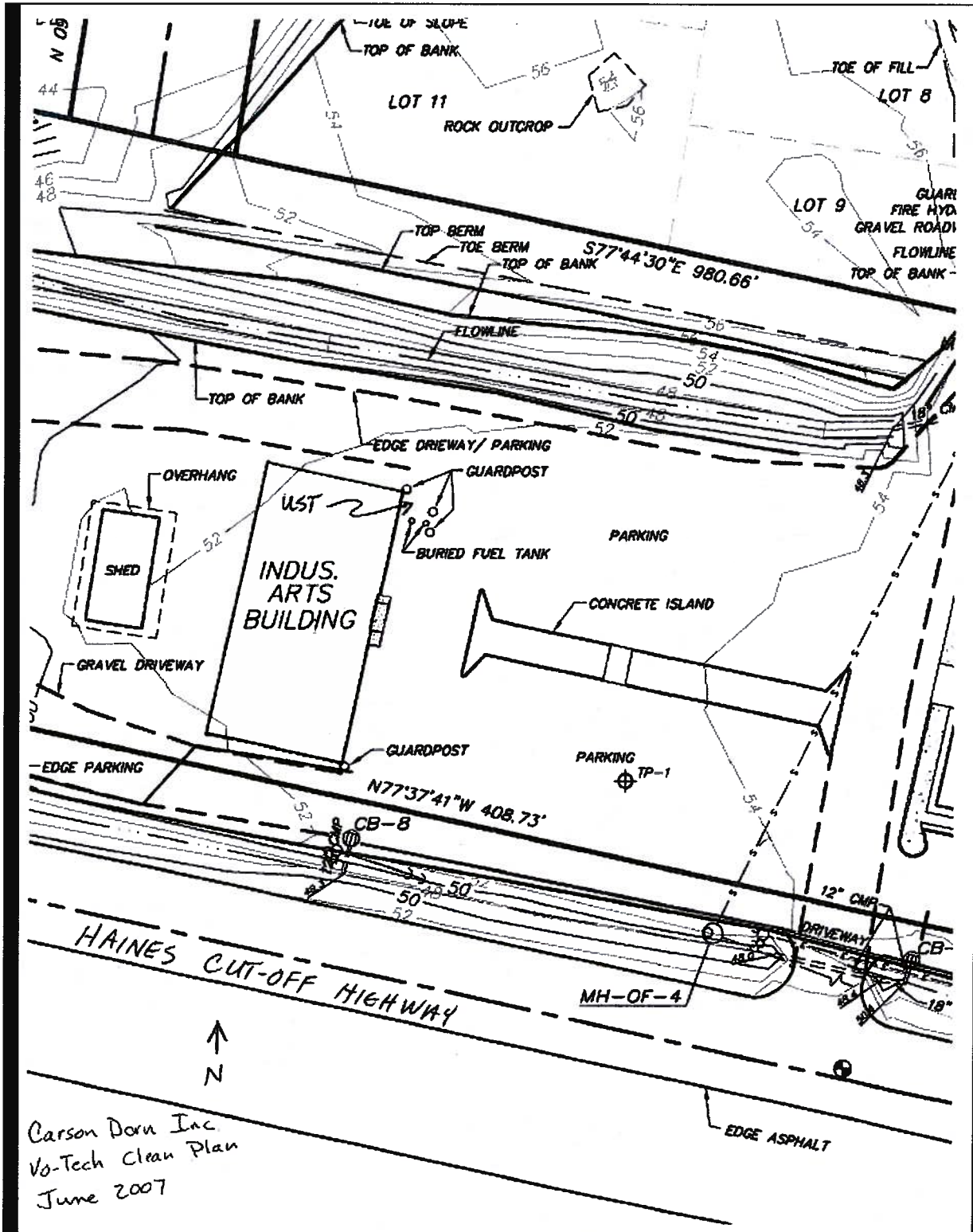
Date

Printed Name of Authorized Representative, Title
Haines Borough

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the DEC project manager at the address on this correspondence within 30 days of receipt of this letter.

Site Map



Closure/IC Details

Three IC Types are recorded in the CS Database for this site as follows:

NEC Deed Notice:

Since petroleum contamination remains in subsurface soil on the Vocational Technical School property above approved cleanup levels, institutional controls are necessary to ensure there is no unacceptable risk to human health or the environment, now and in the future. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office as an institutional control (IC) that identifies the nature and extent of contamination at the property and the conditions that current and future owners and operators are subject to.

Signed CS Determination:

The DEC Contaminated Sites Database will be updated to reflect the institutional controls stipulated in the closure determination agreement and description of the contamination remaining at the site. By signing the closure determination agreement, it is the responsibility of the owner/operator/land manager to maintain the terms of the Institutional Controls as stipulated in the signed agreement. Institutional controls may be removed in the future if documentation can be provided that shows cleanup levels have been met.

When contaminated soil becomes accessible submit a work plan for DEC approval:

Sub-surface soil contamination is located near the foundation of the Vo-Tech building and in the utility corridor as shown in Drawing 1 in the closure determination document. When the Vocational Technical School building is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with a DEC approved work plan.

Task Tracker:

By signing the closure determination agreement, it is the responsibility of the owner/operator/land manager to maintain the terms of the Institutional Controls as stipulated in the signed agreement. If land use and/or ownership changes, the management conditions stated in the closure determination document may not be protective and DEC may require additional remediation and revised conditions. Therefore the Haines Borough shall report to DEC every five years to document land use, or report as soon as the Haines Borough becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local DEC office or electronically to DEC.ICUnit@alaska.gov

CS Database Action

Enforcement Agreement Recorded:

By signing the closure determination agreement, it is the responsibility of the owner/operator/land manager to maintain the terms of the Institutional Controls as stipulated in the signed agreement. If land use and/or ownership changes, the management conditions stated in the closure determination document may not be protective and DEC may require additional remediation and revised conditions. Therefore the Haines Borough shall report to DEC every three years to document land use, or report as soon as the Haines Borough becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local DEC office or electronically to DEC.ICUnit@alaska.gov

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2014-000132-0

Recording District 106 Haines

04/15/2014 09:23 AM Page 1 of 5



NOTICE OF ENVIRONMENTAL CONTAMINATION

Recording District: Haines
Official State Business – No Charge

As required by the Alaska Department of Environmental Conservation, Grantor, pursuant to 18 AAC 75.375 Borough of Haines, Grantee, as the owner and operator of the subject property, hereby provides public notice that the property located at: Haines Highway Cut-off between Fifth Avenue and Allen Road in Haines, Alaska, 99827, and more particularly described as follows:

Tract A-2, Presbyterian Mission Plat (Subdivision of A Fraction of USS No. 735)

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 75, Article 3, as amended October 9, 2008. This release and cleanup are documented in the Alaska Department of Environmental Conservation contaminated sites database at <http://dec.alaska.gov/spar/csp/index.htm> under Hazard ID number 26214.

DEC has reviewed and approved the site cleanup as protective of human health, safety, welfare and the environment, subject to the institutional control specified in this letter. No further cleanup is necessary at this site unless new information becomes available indicating to DEC that the site may pose an unacceptable risk to human health, safety, welfare or the environment.

The property is subject to conditions in order to ensure contamination left onsite remains undisturbed unless a cleanup effort is initiated with the prior approval from DEC. These conditions are as follows:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use zoning and/or ownership changes, these management conditions may not be protective and DEC may require additional remediation and revised conditions. Therefore the Haines Borough and any future property owner of this site shall submit a report to DEC every three years to document land use, or report as soon as the Haines Borough 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 DEC office or electronically to DEC.ICUnit@alaska.gov
2. Sub-surface soil contamination is located near the foundation of the Vo-Tech building and in the utility corridor (Drawing 1). When the Vocational Technical School building is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with a DEC approved work plan.

3. Installation of groundwater wells will require approval from DEC.
4. Existing groundwater monitoring wells must be decommissioned in accordance with DEC guidance. Submit documentation to DEC within 30 days of decommissioning the wells.
5. Any proposal to transport soil or groundwater off-site requires DEC approval in accordance with 18 AAC 7.325(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.
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

The following describes the location, type and levels of contaminated soil remaining on site.

The 2007 sampling data indicated that contaminated soil remains beyond the perimeter of previous removal excavations in a layer between zero and two foot thick in a clay-like confining layer at the northeast corner of the Vocational Technical School building foundation and in a subsurface layer extending northeast in the direction of the High School Building.

Pursuant to 18 AAC 75.325(i)(1) and (2), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-.370. At this site, in the future, if soil is removed from the site or groundwater is brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time.

This NEC remains in effect until a written determination from is recorded that states that soil and/or groundwater at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and/or groundwater meets the cleanup levels in Table C in 18 AAC 75.345 and that off-site transportation of soil and/or groundwater is not a concern.

This document will be filed in the Juneau recording district.

Return to-

Signature: _____



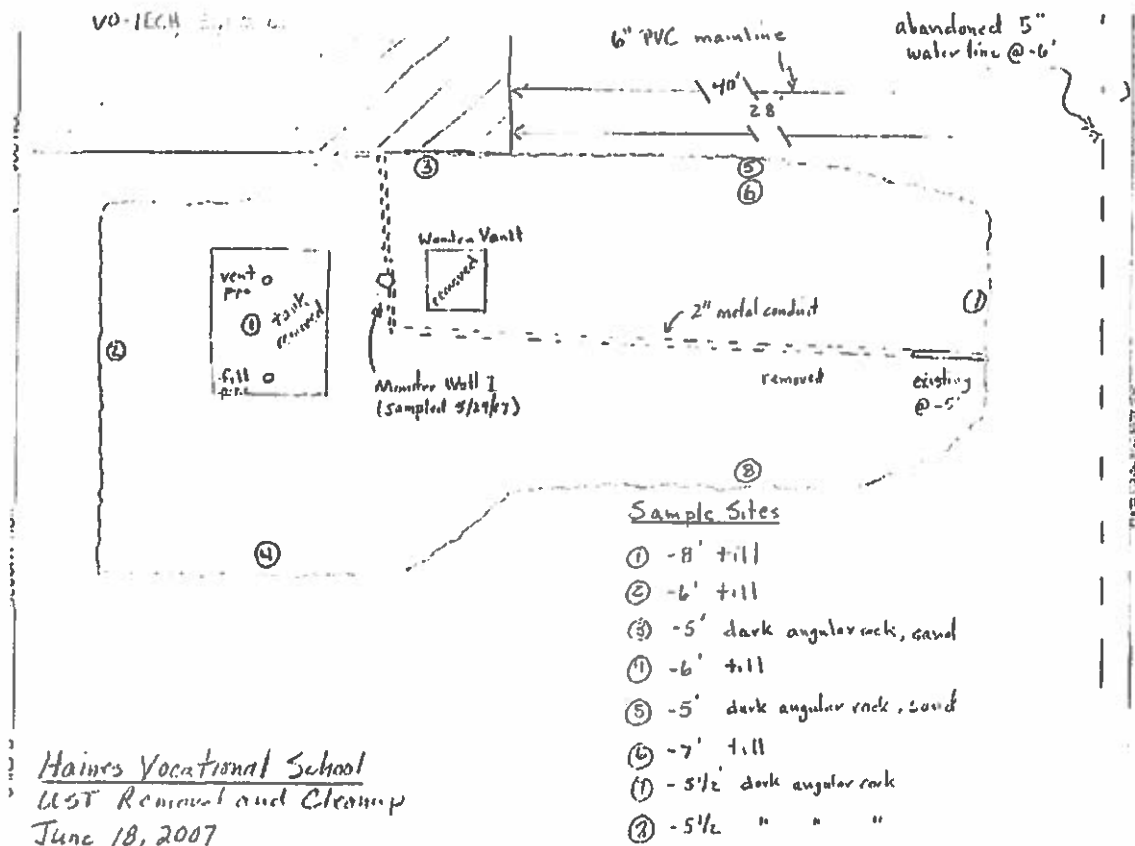
Printed Name:

Evonne Reese, EPS III
Institutional Controls Unit
Contaminated Sites Program / Spill Prevention and Response Division
Department of Environmental Conservation

Mailing Address:

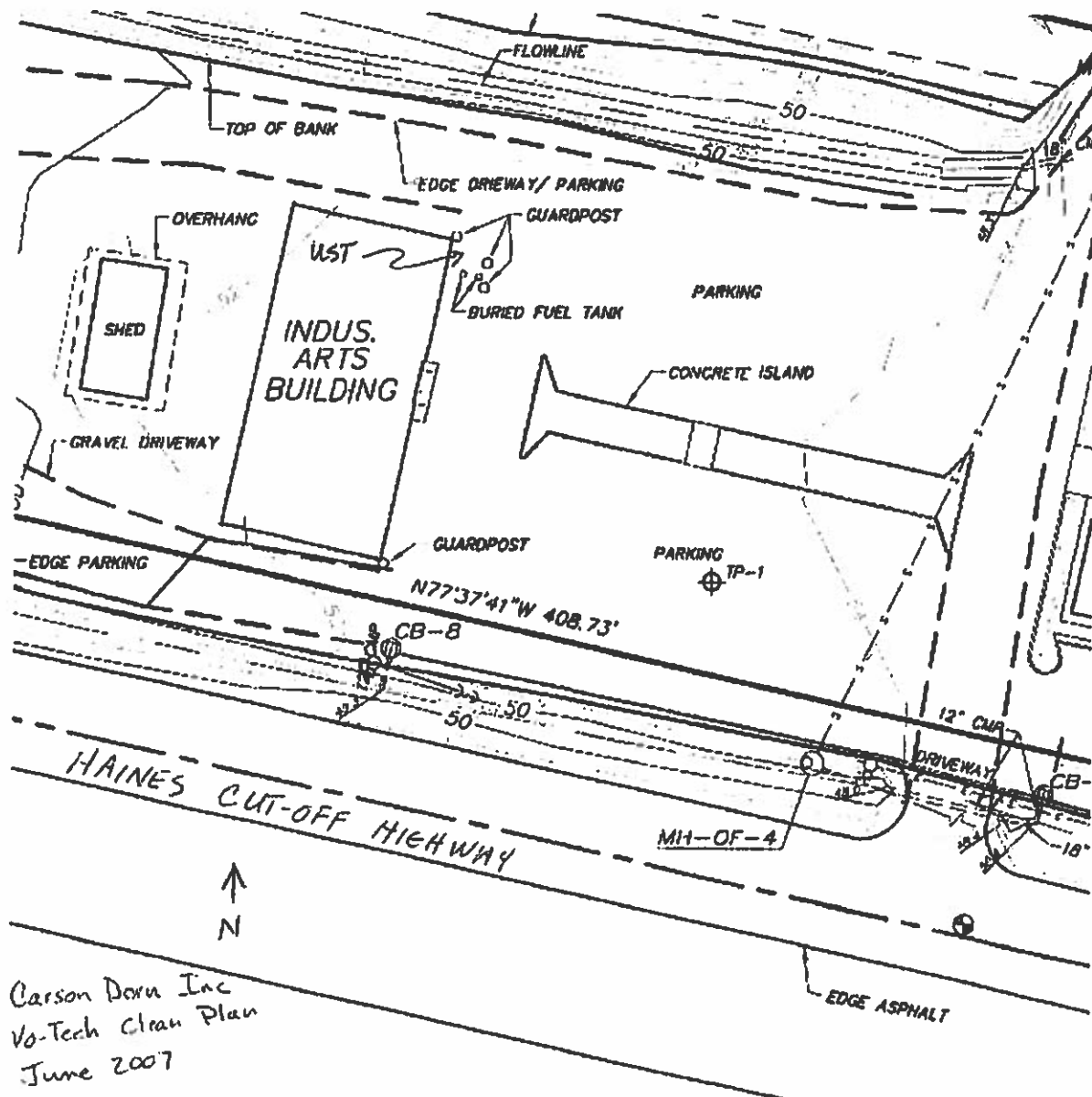
P.O. Box 111800
Juneau, AK 99811-1800





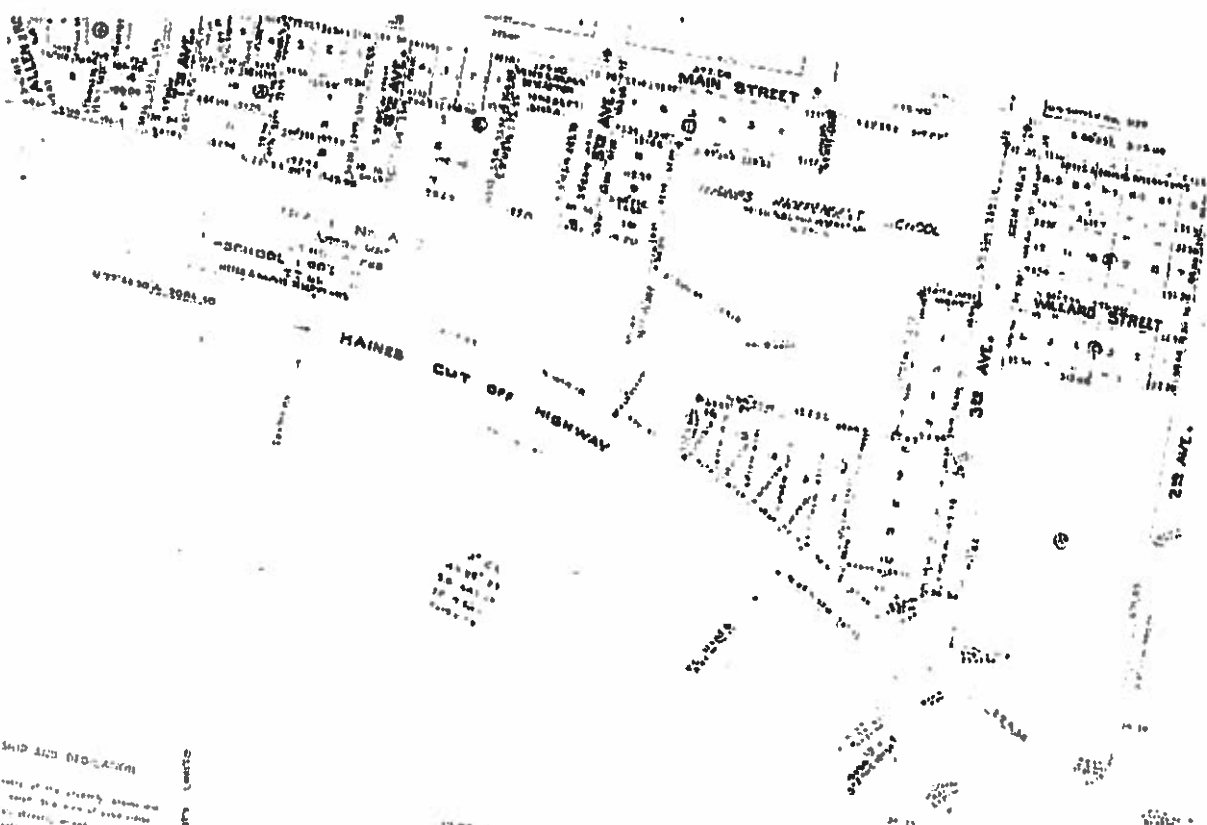
Haines Vocational School
 UST Removal and Cleanup
 June 18, 2007

Drawing 1 with sample locations in the Vo-Tech former UST



Carson Dorn Inc
 Vo-Tech Clean Plan
 June 2007

Drawing 2 Vocational Technical School Carson Dorn 2007



SHIP AND INFORMATION

Notes of the property shown on this plat are to be referred to the original maps which bear the title herein

John A. Brown
 Surveyor

CERTIFICATE OF APPROVAL BY THE BOARD

I hereby certify that the foregoing plat, when compared with the original survey and that the same has been approved by the Board of Commissioners of the City of St. Louis, Missouri, on the 13th day of August, 1937.

August 13 1937

John A. Brown
 Mayor

CERTIFICATE OF APPROVAL BY THE BOARD

I hereby certify that the foregoing plat, when compared with the original survey and that the same has been approved by the Board of Commissioners of the City of St. Louis, Missouri, on the 13th day of August, 1937.

August 13 1937

John A. Brown
 Mayor

PRESBYTERIAN MISSION PLAT
 SUBDIVISION OF
 A FRACTION OF
 U.S. SURVEY NO. 735
 SCALE 1"=100'
 AUGUST 13-1937

Site Plat: Tract A-2, Presbyterian Mission Plat (Subdivision of A Fraction of USS No. 735)