



## Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE Contaminated Sites Program

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May 19, 2020

Scott Curtin Public Works Director City of Kenai 210 Fidalgo Kenai, Alaska 99611-7794

Re: City of Kenai Maintenance Yard ADEC Hazard ID 2075 Site Characterization Work Plan Requirement

Dear Mr. Curtin,

I work for the Alaska Department of Environmental Conservation (ADEC), Division of Spill Prevention and Response, Contaminated Sites Program in the Soldotna ADEC office. The **City of Kenai Maintenance Yard** contaminated "site" has been a known and listed site in our Contaminated Sites Program (CSP) database of sites since 1994. The website link to this site in our database is: <u>http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/2075</u>

I am the new CSP Project Manager assigned to this site. I am addressing this letter to you, since in the past, our point of contact in the City of Kenai for this site was the Public Works Department. If another Department or City of Kenai official is a more appropriate point of contact, please provide this letter to that person.

In 2018, Mr. Horwath from our office requested a work plan. Please inform our office of the status of this plan.

A summary of the status of this project based on our administrative file, is that previous site characterization work has been completed, and several areas of contamination were confirmed. The primary contaminants of concern were petroleum and oil products, although some additional hazardous substances were also detected above ADEC soil and groundwater cleanup levels. The extent and magnitude of the contamination was never fully identified. Now that the Kenai maintenance facility has been relocated to the Marathon Road location, the conditions are primed for site characterization work at the former maintenance yard to be completed, followed by appropriate cleanup work.

The most recent work conducted at the former maintenance yard occurred in 1998. Following that work, on March 23, 2004, the environmental consulting firm American Environmental (on behalf of, and under contract to, the City of Kenai) prepared and submitted a **2003 Sampling Work Plan** to ADEC. The work plan was dated July 24, 2003, and was submitted in response to ADEC's request for further site investigation at the Kenai maintenance yard. That work plan was designed to provide current groundwater, soil, and sediment sample data from the site. ADEC approved that work plan on March 24, 2004, with its letter addressed to Jack LaShot, former City of Kenai Public Works Manager. We find no later reports within our project file to indicate that this work plan was ever implemented at the maintenance yard site.

Since 2004, ADEC's applicable regulations (18 AAC 75) have been amended and revised to an extent that a new site characterization work plan is required in order to ensure compliance with current regulatory standards. The work plan approved by ADEC in 2004 would not fulfill the current regulatory standards and concerns.

## Site Characterization Work Plan Required:

ADEC is now requiring that the City of Kenai employ a qualified environmental professional to prepare a new and revised site characterization and remediation work plan for the City of Kenai Maintenance Yard "site", within the context of the regulatory authority and requirements imposed under 18 AAC 75.335 (Site Characterization). The work plan is required to be signed by the qualified environmental professional, and approved by ADEC prior to implementation. We request that this work plan be submitted to ADEC by Jul 30, 2020, in order to allow the additional site characterization field work to be performed in the 2020 summer season.

Our administrative records are available for your information and understanding. Our project file contains several historical site characterization reports, as well as prior correspondence between the City and/or its contractors, and ADEC.

If you have questions or need further assistance, feel free to contact me at (907) 262-3412, or via email at <u>peter.campbell@alaska.gov</u>

Sincerely,

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Peter Campbell Project Manager