



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No.: 1515.38.005

ELECTRONIC MAIL ONLY

August 3, 2020

Mr. Eric Rhodes
Brownfields Coordinator
Organized Village of Kasaan
P.O. Box 26-KXA
Ketchikan, AK 99950-0340

Re: Analysis of Brownfields Cleanups Alternatives for Kasaan Library

Dear Mr. Rhodes:

In February 2020, the Southeast Island School District applied to the Alaska Department of Environmental Conservation (ADEC) for brownfield assessment and cleanup services at the Kasaan Library. Previous assessment work on-site identified asbestos-containing materials (ACMs) in the building. Consequently, ADEC is planning to provide abatement and disposal services of ACMs so that it can be safely reused as the town's library and elementary school.

In preparing for these cleanup activities, ADEC developed an Analysis of Brownfield Cleanup Alternatives (ABCA), which summarized the cleanup options considered, as well the relative costs of each option. The alternatives were evaluated based on overall protectiveness to public health and welfare of the environment, and feasibility in achieving site reuse. After careful consideration, the ABCA recommended the abatement and disposal of ACMs from the Kasaan Library.

The ABCA was open for public comment from June 16-July 16, 2020. An electronic copy was placed on ADEC's Contaminated Sites Database and the Organized Village of Kasaan (OVK) website, while a hard copy of the ABCA was available at the Kasaan Post Office. Extra copies were also distributed by the town clerk. The public was notified of the opportunity to review and comment on the ABCA through ADEC's public notice website, by locally posting flyers, through a notice in the Island Post, and through encouragement of city officials. On June 18th, I attended a meeting of the OVK tribal council. At that meeting, you and I jointly provided an overview of the project, the alternatives identified in the ABCA, and the recommended approach for cleanup.

We did not receive any additional comments or feedback on the cleanup alternatives presented in the ABCA. However, OVK has clearly stated its support for the recommended approach: the abatement and

August 3, 2020

disposal of ACMs from the Kasaan Library (see the attached letter of support). Therefore, the ABCA can be finalized and we will proceed with the recommended cleanup alternative.

I am currently arranging for contractor support to provide the technical services necessary to complete this project. In the interim, please let me know if you have any questions. I look forward to continuing to work with you to cleanup the Kasaan Library and return it to a safe and productive reuse for the Kasaan community.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Thomas". The signature is fluid and cursive, with a long horizontal stroke at the end.

Marc Thomas
Environmental Program Specialist

Electronic cc: Lisa Griswold, ADEC
Anne Marie Palmieri, ADEC
Mary Goolie, US EPA



SOUTHEAST ISLAND SCHOOL DISTRICT

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February 11, 2020

Alaska Department of Environmental Conservation
Contaminated Sites Program
Attn: Lisa Griswold
555 Cordova Street, 2nd Floor
Anchorage, AK 99501
lisa.griswold@alaska.gov

SENT VIA EMAIL

RE: Letter of Intent

Dear Alaska Department of Environmental Conservation: Lisa Griswold

The following represents a summary of the Southeast Island School District's proposal to ADEC Contaminated Sites Program regarding the Kasaan Library. Southeast Island School District hereby sets forth its intent to take over the cleanup of the Kasaan Library project from the Organized Village of Kasaan.

This letter contains nonbinding provisions of understanding between the parties. Unless otherwise explicitly stated, it does not impose any legal obligations on either party.

Southeast Island School District has chosen to follow through with the Recommended Remedial Actions presented by BGES, Inc. who conducted the building assessment on October 31, 2019. These recommendations were to abate ACMs from the building and to dispose of ACMs at appropriate disposal facility. Cost estimate for abatement and disposal was \$21,890.00, as stated on page 16 on the BGES Property Assessment and Cleanup Plan. Whereas ADEC already has all the information on this site, please accept this letter of intent as an official application from Southeast Island School District for a DBAC cleanup.

Sincerely,

A handwritten signature in black ink that reads "Sherry Becker". The signature is written in a cursive, flowing style.

Sherry Becker
Superintendent

FINAL: ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

**Kasaan Library
Kasaan, Alaska
Drafted June 5, 2020**

1.0 Introduction

This Analysis of Brownfield Cleanup Alternatives (ABCA) is intended as a screening tool to ensure and document that the appropriate type of cleanup is selected to address environmental contamination at the Kasaan Library property in Kasaan, Alaska. The preferred remedial action considers site characteristics, the surrounding environment, potential future uses, and cleanup goals. This ABCA was open for public comment from June 16, 2020 - July 16, 2020.

2.0 Site Description

The Kasaan Library property is owned by the Southeast Island School District (SISD) and located at 117 Kasaan Street in Kasaan, Alaska on Prince of Wales Island. The property is located south of the intersection of College Street and Peele Avenue in the central portion of Kasaan. The legal description of the subject property is Block 5, Lot 8, United States Survey (USS) 1896. The library is surrounded by a residential neighborhood. The Kasaan School is located adjacent to and northwest of the library, the Kasaan Volunteer Fire Department is approximately 565 feet southeast of the subject property, and a medical clinic is just east of the site. The property is approximately 13,000 square feet in size and is currently used as a library and a part-time classroom. Although the building is reportedly in fair condition, the building is poorly insulated. The community plans to renovate the building by updating the heating system, increasing heat circulation, and installing a new roof. The library itself is a modular unit that was conveyed/quitclaimed from the Alaska Department of Transportation and Public Facilities in 1995. The unit was moved to its present site in Kasaan from Craig in May 2001.

Previous assessment work on-site has identified asbestos-containing materials (ACMs) in the building. The community desires removal of ACMs so that it can be safely reused as the town's library and elementary school. Once cleanup is complete, SISD will update the heating system and add a new roof. Funds have already been acquired to make the envisioned building updates.

3.0 Previous Investigations

July 2000. 1995. South East Regional Resource Center (SERRC). *Asbestos Reinspection Report for Southeast Island School District: Kasaan K-12 School, Kasaan Portable*. This 2000 reinspection report identified non-friable asbestos sheet vinyl flooring and mastic in fair condition that was covered with painted plywood and or carpet.

April 2009. Environmental Management, Inc. *Asbestos Inspection Update: Southeast Island School District, Kasaan School and Library*. According to this report, friable and non-friable ACM was detected in the

library. Additional sampling efforts did not reveal new ACM beyond what had been previously noted in the 2000 reinspection report. The report notes that most of the exposed ACM exists as spray-on acoustical ceiling texture, with the exception of some asbestos sheet vinyl and mastic in the storage, furnace, and two bathrooms. Most of the ACM was in good to fair condition, with some minor damage to the spray-on acoustical ceiling texture.

December 2019. BGES, Inc. *Kasaan Library Property Assessment and Cleanup Plan (PACP)*. BGES conducted site activities on October 31, 2019. The purpose of the assessment was to evaluate the potential presence of lead-based paint (LBP) and ACMs in the library. BGES conducted LBP and asbestos inspections of readily accessible interior and exterior surfaces of the building. LBP was not identified on the subject property. ACMs in good condition were identified on the subject property. The report found that joint compound and ceiling texture materials in the hallway and main room of the library should be considered friable ACMs and the vinyl flooring and mastic in the storage room, furnace room, and bathrooms should be considered Category I non-friable ACMs. All of the identified ACMs in the library are regulated asbestos containing materials (RACM). The report recommended that the identified ACMs identified during preparation of the PACP and during previous asbestos inspections be abated, packaged appropriately for shipping, and transported to an appropriate disposal facility or encapsulated. This report also identified an aboveground storage tank (AST) on the property and recommended that it be equipped with secondary containment.

4.0 Remedial Alternatives Considered

This section identifies the remediation alternatives that may be used to address the environmental contamination at the site. The “No Action Alternative” is used as the baseline against which the other alternatives are analyzed. All of the alternatives will be evaluated with respect to Chapter 75 of Title 18 of the Alaska Administrative Code (18 AAC 75).

The following broad categories of evaluation criteria were considered in assembling remediation at the site:

- Overall protectiveness to public health and welfare of the environment
- Feasibility in achieving site redevelopment

A Summary of the general cost estimate for Alternative #2 (abate and dispose of ACM) is presented below. Alternative #1 (no action) has no associated cost.

4.1 No Action – Alternative #1

The “No Action Alternative” is included for comparison purposes as stipulated in the ABCA process. This alternative does not address the ACMs identified in the library. Further, the community’s plans to upgrade the heating system and roof may be prevented if a “No Action Alternative” is selected, as such upgrades may not be safely completed unless ACMs are abated and disposed of properly. Given the use of this property for community functions (library and

elementary school), this property would remain an environmental hazard if ACMs are not addressed appropriately. The no action alternative has no associated cost.

4.2 Abate and Dispose of ACMs - Alternative #2

The “Removal and Dispose of ACMs Alternative #2” abatement, transportation, and disposal of ACMs in a regulated landfill. The advantage of this alternative is that it eliminates the risk to human health and the environment, whereas the no action alternative does not. Further, Alternative #2 removes any identified ACMs so that it can be safely reused as the town’s library and elementary school. The disadvantage is it requires some modest funding to accomplish. The following table presents a summary of general estimated costs for Alternative #2:

Asbestos Abatement and Disposal	
Abatement Company	
Mobilization (lump sum)	\$5,000
Abatement of ACMs (lump sum)	\$10,000
Replacement of Abated Materials (lump sum)	\$5,000
Transportation and Disposal of ACMs	
Transportation from Craig to Juneau (4 pallets @ \$113 ea)	\$450
Disposal (6 cubic yards @ \$240 ea)	\$1,440
Estimated Total	\$21,890

This cost estimate assumes transportation and disposal of ACMs from Craig to Juneau. This cost estimate was calculated based on several broad assumptions, including mobilization of a non-local contractor and disposal of ACM at the Juneau Capitol Disposal Landfill. A representative of Juneau Capitol Disposal Landfill indicated that they would accept waste associated with this project; however, there may be other landfills that would also accept the material. Several logistical and planning methods may be utilized to achieve additional cost savings, including but not limited to: using local equipment and personnel to conduct the renovations and conducting all renovation actions concurrently to minimize mobilization (if applicable) or material transportation costs.

5.0 Preferred Remedial Alternative

The remedial alternatives were evaluated based on overall protectiveness to public health and welfare of the environment, and feasibility in achieving site reuse.

The “No Action – Alternative #1” would leave ACMs in place possibly endangering the community by exposure to contamination via multiple complete pathways and hampering re-use of the site.

The “Abate and Disposal of ACMs—Alternative #2” is considered technically feasible and capable of protecting human health and the environment. DEC has determined that the “Abate and Disposal of ACMs—Alternative #2” is the preferred strategy for the site. Alternative #2 would abate/remove all identified ACMs at the property, package appropriately for shipping, and transport

to an appropriate disposal facility. The removal and proper disposal of ACMs will provide an important step in reuse of this property by providing a safe location for a community library and school and is consistent with the community’s vision for the property’s reuse.

6.0 Figures

Figure 1: Sample Locations -Potential Asbestos Containing Building Materials

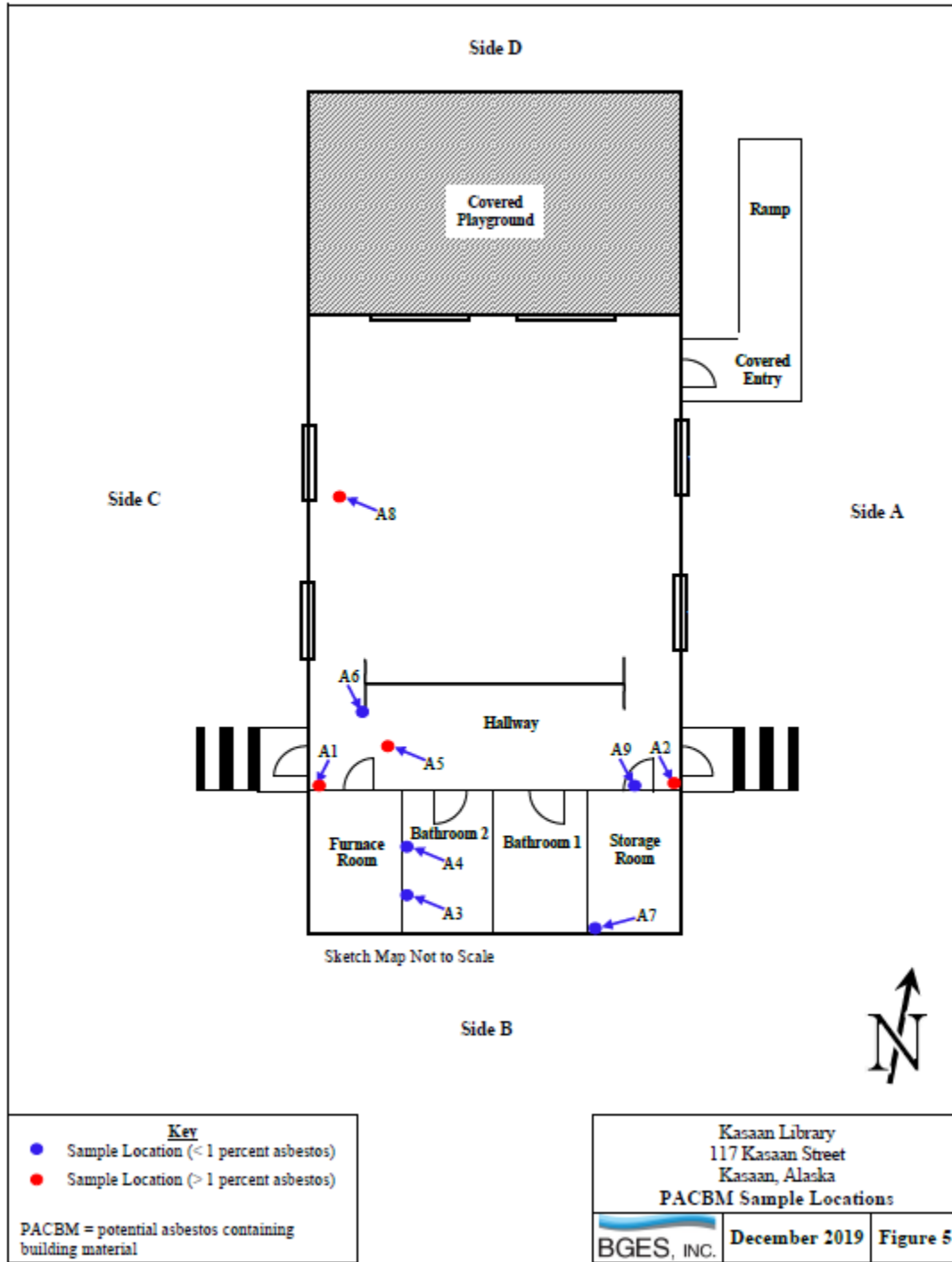
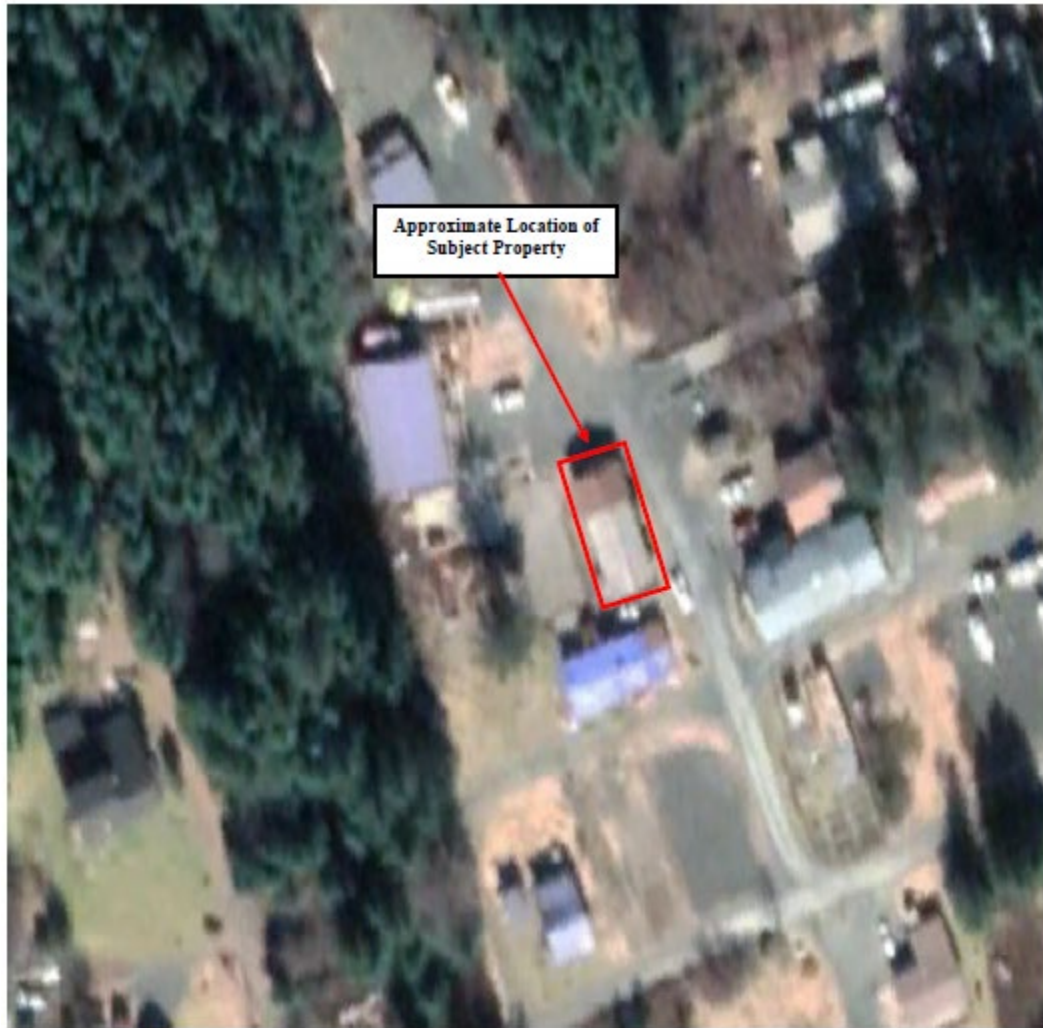
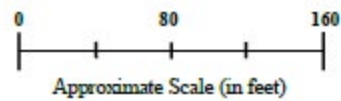


Figure 2: Kasaan Library Location (March 2019)



Source: Google Earth



7.0 References

South East Regional Resource Center (SERRC), July 2000. *Reinspection Report for Southeast Island School District*. ADEC File No. 1515.38.005.

Environmental Management, Inc., April 2009. *Asbestos Inspection Update: Southeast Island School District, Kasaan School and Library*. ADEC File No. 1515.38.005.

BGES, Inc., December 2019. *Kasaan Library: Property Assessment and Cleanup Plan*. ADEC File No. 1515.38.005.