

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE  
CONTAMINATED SITES PROGRAM

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File: 2333.38.013

April 13, 2012

Mr. Don Jack  
c/o Reeves Amodio LLC  
2522 Arctic Boulevard, Suite 200  
Anchorage, AK 99503

RE: Coastal Drilling Site  
Focused Site Investigation Report Former Coastal Drilling Site  
ADEC Report Review Comments

Dear Mr. Jack:

On September 29, 2010, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received Alta Geosciences, Inc.'s September 2010 Focused Site Investigation Report Former Coastal Drilling Site for the above referenced facility. Thank you for performing this investigation work, and providing us a copy of Alta Geosciences' report.

The first intent of this letter is to inform you that I have been assigned ADEC project manager responsibilities for this site. Please direct future correspondence regarding this site to me.

Upon review of the site investigation report and additional historical project related reports in our administrative file, we have generated the following observations, comments and concerns for your review, consideration, and response:

1. ADEC regulations require that a qualified consultant collect, interpret, and report environmental site assessment data. The Focused Site Investigation Report did not include the required signature of the qualified consultant performing this field work. Please submit the required signature from the Kent & Sullivan staff-person certifying that the collection, identification, and reporting of this site assessment sample data is correct within this report.
2. In Section 2.4, Grate Soil Sampling Analysis, the last sentence references a Table 3 that includes a summary of the analytical results from the Grate Soil Sampling. Table 3 was not included in the copy of the report we received. Please submit a copy of Table 3 of the Grate Soil Sampling, and any associated narrative/text, for placement in our report.

3. Hexavalent chromium analysis was conducted and reported following this investigation, and we have determined that chromium +3 is the valence of the chromium present at this site, which doesn't exceed any ADEC site cleanup levels. Chromium is no longer considered a contaminant of concern at this site.
4. In Section 3-3, on page 3-3, the report expressed the conclusion that the recent PCB sampling results negate previous investigation findings. We do not concur with this conclusion, and we believe that PCB levels present in soils at this site do present an unacceptable exposure risk for the current and future uses of the property.
5. Section 4.0, Conclusions, on page 4-1, details the principal findings from the investigation. Shall we expect to receive a workplan, outlining in detail the proposed plans for remedial options for progressing to a site closure request/decision?

There are additional considerations that we believe should be discussed and considered, related to establishing appropriate soil and groundwater cleanup levels for this site. Based on the information currently available to us, it appears that groundwater has not been impacted at the site. In addition, because of PCB's present in the soils, communication with EPA may be necessary prior to any intrusive remedial actions at the property. Rather than trying to complete this discussion in written correspondence, we recommend a meeting (teleconference) with Alta Geosciences. Following this discussion, we would then expect to receive a written response to the above comments/concerns, and any other pertinent matters, perhaps in the form of a cleanup work plan or closure plan detailing additional proposed site work.

We would like to schedule a teleconference call to further discuss outstanding regulatory concerns and requirements at this site before the end of May, 2012. Please contact me at 262-3412, or by e-mail at [peter.campbell@alaska.gov](mailto:peter.campbell@alaska.gov) for purposes of scheduling a mutually acceptable meeting date/time.

Sincerely,



Peter Campbell  
Environmental Program Specialist

Cc: Mr. Alex Tula  
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