



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 2319.26.002

April 13, 2023

Joe Browning
Kasilof Riverview Lodge
P.O. Box 254
Kenai, AK 99610

Re: Kasilof Riverview Lodge
Hazard ID: 22950
Additional Release Investigation Activities – ADEC Comments and Work Plan Requirement

Dear Mr. Browning,

The Alaska Department of Environmental Conservation's (ADEC), Contaminated Sites Program (CSP) received the Additional Release Investigation Activities report prepared by Shannon & Wilson, dated December 2022. The report was received on January 3, 2023. The report is approved.

After reviewing the analytical results from this monitoring well installation report, we have concluded that concentrations in the tank excavation zone appear to be migrating away from the tank area and toward the Kasilof River. Results from the Underground Storage Tank Closure Assessment report (November 2019) presented concentrations of Gasoline Range Organics (GRO), Benzene, Toluene, Ethylbenzene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, n-Propylbenzene and Naphthalene exceeding human health limits in the excavation. Numerous volatile organics and polynuclear aromatic hydrocarbons exceeded migration to groundwater concentrations.

Monitoring well MW-5 has an exceedance of benzene above DEC cleanup levels. Benzene is one of the most mobile components in gasoline. Ethylbenzene was also present in the monitoring well MW-5 sample. Benzene was also detected above cleanup levels in the water sample from MW-1. In addition, toluene was detected in the drinking water well sample.

Based on these results we are going to require that the onsite monitoring wells and the drinking water well be sampled quarterly for the next year, with future testing to be evaluated based on results. Quarterly sampling will measure groundwater levels to determine if the river is a seasonally discharging/influent source influencing groundwater flow direction. To this end, a datum should be established on the Kasilof River (perhaps at the bridge), and the river water elevation used in water elevation contour maps. Sampling will also be conducted to measure groundwater quality in monitoring wells and the on-site water supply well for contaminants of concern established in the tank excavation sampling.

Water sample results in monitoring well MW-5 and MW-1 indicate that contamination may be migrating from the former fuel storage tank area toward the Kasilof River. Kasilof Riverview will be required to conduct additional assessment and remediation work at the site. ADEC will require that a corrective action work plan be submitted to our office. Soils remaining in the footprint of the diesel tank, fuel island and the gasoline tanks that were abandoned in place exceed the migration to groundwater cleanup levels and maximum allowable concentrations for GRO. The work plan should assess groundwater impacts at the UST tank sites and remediation of the impacted soils and impacted groundwater.

In future reports, please provide a historical data tables for site data, including elevation, soil and groundwater concentrations. This will simplify reviewing trends in concentrations. Please include the drinking water well location on your site maps.

You are required to submit a work plan to our office by May 31, 2023. If you have any questions or need further assistance, please feel free to contact me at 907-262-3412 or by email at peter.campbell@alaska.gov.

Sincerely,

Peter Campbell



ADEC Environmental Program Specialist
Contaminated Sites Program

CC: Dan McMahon – Shannon & Wilson by e-mail