



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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August 9, 2021

Via Email

Chilkoot Lumber Company
Attn: Lori Smith
P.O. Box 1469
Haines, Alaska 99827-1469
lorismithrdh@aol.com

Re: 2020 Sampling and Analysis Report Approval Letter

Dear Ms. Smith,

The Alaska Department of Environmental Conservation (Department) recently reviewed the *2020 Sampling and Analysis Report* for “Stockpile B” at the Haines Sawmill contaminated site in Haines, Alaska. The report was initially submitted to the Department on March 25, 2021 by Kai Environmental.

Initially referred to as the “South Stockpile,” “Stockpile B,” was constructed in 2014 by Chilkat Environmental. The original stockpile dimensions were 73 feet long by 29 feet wide and 16 feet tall (approximately 1,255 cubic yards of contaminated soil). The stockpile is located approximately 200 feet from the shore of Lutak Inlet. According to 2014 *Stockpile Stabilization and Maintenance Plan*, the stockpiled soils were generated from the powerhouse building pad, aboveground storage tank (AST) location, generator building, powerhouse shop, and hog fuel barn from 2008 to 2014. All material was processed through a three-inch screen. The construction of the stockpiles and subsequent maintenance and sampling were performed by Chilkat Environmental from 2008 until 2016. In 2018, Kai Environmental received ADEC approval to continue implementing 2016 Stockpile Characterization Workplan originally prepared by Chilkat Environmental. Kai Environmental conducted stockpile characterization activities in 2018 and 2020 and one two-foot lift in 2019. The current dimensions of the Stockpile B are 76 feet long by 20 feet wide with a height ranging from two to five feet. The stockpile currently consists of approximately 1,255 cubic yards of petroleum contaminated soil.

The stockpile was uncovered for a total of 47 days throughout the summer starting on May 24, 2020 and was mechanically aerated using an excavator six times. An estimated 588 to 600 gallons of water were pumped from the stockpile through a charcoal filter.

On September 22, 2020, the stockpile was sampled by Kai Environmental personnel. The stockpile was divided into two different sections for composite sampling. Twelve test holes and three trenches were field screened in situ from "Section 1" on the southeast portion of stockpile. A total of five composite samples, including a duplicate, were collected from "Section 1". Two composite samples and one duplicate were taken from aliquots of selected test pits throughout "Section 1" at 1-2 feet below the surface. These samples were analyzed using the Synthetic Precipitation Leaching Procedure for Residual Range Organics and Diesel Range Organics (SPLP RRO, SPLP DRO). One composite sample was taken from selected discrete samples taken from three trenches in "Section 1" at 2-4 ft below the surface. One additional composite sample was taken and comprised of the composite sample with the highest PID reading and the composite sample of the trenches. This sample was analyzed for SPLP RRO and SPLP DRO.

Eight test holes were field screened in situ from "Section 2" on the northwest portion of stockpile. Two composite samples and one duplicate were taken from aliquots of selected test pits throughout "Section 2" at 1-2 feet below the surface. These samples were analyzed for SPLP RRO and SPLP DRO.

The SPLP RRO analysis for CLC-01-02 exceeded the ADEC Table C cleanup level. CLC-01-03 (the duplicate of CLC-01-01) exceeded ADEC's Method 2 Migration to Groundwater (MTG) cleanup level for DRO. CLC-02-02 SPLP RRO result exceeded ADEC's Table C cleanup levels. CLC-02-03 (the duplicate of CLC-02-01) exceeded ADEC's Method 2 MTG cleanup levels for DRO. All other samples were below ADEC's Table C and Method 2 MTG cleanup levels.

The Department reviewed this report, provided comments, and requested an updated work plan with additional detail on July 2, 2021. The Department's comments and requests were discussed in a teleconference on July 13, 2021. The Department's comment generally discussed clarification on sampling and analysis methodology. The Department requested an updated sampling and analysis work plan for future sampling. On June 19, 2021, a response to comments on the report and future work were provided by Kai Environmental. Clarifications and additional information were provided to the Department in the revised report and comments table. The revised report contained a work plan for the maintenance of the stockpile for 2021. Additionally, on July 28, 2021, the Department received a 2021 *Stockpile Maintenance Memorandum* that requested the screening of two inches or greater material for re-use in the construction of a new driveway.

The response to comments and report revisions satisfy the applicable regulatory requirements and ADEC's concerns. The revised 2020 report is **approved**. Please notify me if any significant changes to the work plan occur. Please be sure to carbon copy cs.submittals@alaska.gov for any future document submittals.


Sampling and Analysis Plan

An approved *Sampling and Analysis Workplan* is required prior to any site characterization or sampling activities. The workplan should refer to the ADEC *Field Sampling Guidance* (2019) and the *Site Characterization Work Plan and Reporting Guidance for the Investigation of Contaminated Sites* (2017). Soil in this stockpile originated from the powerhouse building pad, AST location, generator building, powerhouse shop, and hog fuel barn. The exact sources of petroleum contamination in these locations are unknown but suspected to have occurred due to

leaking heavy equipment, hydraulic fluids, lubricant oils, waste oils, heating oil, and diesel, therefore, the work plan should refer to the recommended analyses for “Waste oil, used oil, or Unknowns” category in Appendix F of the ADEC *Field Sampling Guidance*.

If you have any questions please contact me at (907) 465-5368 or julie.fix@alaska.gov.

Sincerely,

DocuSigned by:

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Julie Fix
Project Manager
Contaminated Sites Program

Enclosures: ADEC Comments Table

cc: Lisa Krebs-Barsis, ADEC, lisa.krebs-barsis@alaska.gov
Cathy Needham, Kai Environmental, cathy@kaienvironmental.com