THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental Conservation

SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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CAPT Steven Anderson
US Public Health Service
701 5th Avenue, Suite 1600, MS-24
Seattle, WA 98104

RE: Cleanup Levels at the Indian Health Services Kanakanak Hospital

Dear Capt. Anderson:

The Indian Health Service's (IHS) Kanakanak Hospital near Dillingham, Alaska has a number of contaminated sites, principally due to historical releases of fuels and chlorinated solvents. IHS has conducted characterization, remediation, and cleanup efforts at these sites for several decades; these substantial efforts are ongoing.

As part of this process, in 1998, the Alaska Department of Environmental Conservation (DEC) approved Alternative Cleanup Levels (ACLs) for the Kanakanak Hospital sites. These ACLs were approved at a time when DEC regulations concerning contaminated sites were still under development. The 1998 ACLs were believed at the time to be protective of human health, however toxicological reference doses and procedures for calculating cleanup levels have changed since that time. Additionally, the 1998 ACLs did not address the potential for contaminants to migrate to groundwater.

Due to a number of factors, including updated toxicological information for some contaminants and numerous regulation changes in the interim years, DEC now finds it necessary to rescind approval of the 1998 ACLs.

The contaminated sites at Kanakanak Hospital are subject to the "site cleanup rules", 18 AAC 75.325 – 18 AAC 75.390. Thus, in lieu of the 1998 ACLs, the currently promulgated cleanup levels in 18 AAC 75 apply. For contaminants in soil, the Human Health, Maximum Allowable, and Migration to Groundwater cleanup levels apply, as listed in Tables B1 and B2 of 18 AAC 75.341. For contaminants in groundwater, the Groundwater Cleanup Levels in Table C of 18 AAC 74.345 apply.

As an alternative to the cleanup levels listed in Tables B1, B2, and C, IHS may develop new alternative cleanup levels using the procedures described in 18 AAC 75.340 (d)-(f).

The 1998 ACLs and current cleanup levels are provided for comparison in Table 1. Please note that in many cases the current human health cleanup levels are higher than the 1998 ACLs; however the migration to groundwater cleanup levels are almost all lower than the 1998 ACLs.

Table 1 – 1998 ACLs Compared to Current Cleanup Levels (Tables B1, B2, and C)

Contaminant (Table B1)	1998 ACL (mg/kg)	DEC Human Health Cleanup Level (mg/kg)	DEC Migration to Groundwater Cleanup Level (mg/kg)
Benzene	9	11	0.022
Toluene	180	200	6.7
Ethylbenzene	89	49	0.13
Xylenes	81	57	1.5
Benzo(a)pyrene	1	1.5	1.9
Chrysene	620	1500	600
Indeno(1,2,3,-cd)pyrene	11	15	65
Benzo(k)fluoranthene	110	150	190
Benzo(b)fluoranthene	11	15	20
Benz(a)anthracene	6	14	0.70
Dibenz(a,h)anthracene	1	1.5	6.3

Contaminant (Table B2)	1998 ACL (mg/kg)	DEC Maximum Allowable Cleanup Level (mg/kg)	DEC Migration to Groundwater Cleanup Level (mg/kg)
Gasoline Range Organics (GRO)	1400	1400	300
Diesel Range Organics (DRO)	5000	12500	250
Residual Range Organics (RRO)	10000	22000	11000

Contaminant (Table C)	1998 ACL (mg/L)	Groundwater Cleanup Level (mg/L)
Tetrachloroethylene (PCE)	0.005	0.041

mg/kg – milligrams per kilogram
mg/L – milligrams per liter

DEC's intent in rescinding the 1998 ACLs is not to complicate ongoing cleanup operations; rather our intent is to steer ongoing work in a direction that will be protective of human health and the environment, and will result in defensible site closure decisions.

Please note that areas of concern (AOCs) that have been classified as “Cleanup Complete” or “Cleanup Complete with Institutional Controls” may be subject to further review to determine if site conditions continue to be protective of human health and the environment.

DEC thanks you for your understanding regarding this decision, and remains committed to assisting both Indian Health Services and Bristol Bay Area Health Corporation in moving the contaminated sites at Kanakanak Hospital towards Cleanup Complete status.

If there are any questions, please contact project manager Tim Sharp by phone at (907)451-2131, or by email at tim.sharp@alaska.gov.

Sincerely,

Bill O’Connell
Environmental Program Manager

cc: Tim Sharp, DEC
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