

Appendix P
ADEC ACL Determination Letter
River Terrace Remedial Investigation

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION & RESPONSE
CONTAMINATED SITES REMEDIATION PROGRAM
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August 27, 1997

Mr. Gary Hinkle
River Terrace RV Park
P.O. Box 327
Solomna, AK 99669

Re: River Terrace Site; Cleanup Levels
Spill No. 92-23-09-187-01

Dear Mr. Hinkle:

The Department of Environmental Conservation (DEC) has established on-site cleanup levels for the River Terrace Site (hereinafter referred to as the Site) as described below, subject to the conditions set forth below. These include on-site soil cleanup levels as well as separate onsite groundwater cleanup levels for the lower drinking water aquifer, and aquifers between the lower drinking water aquifer and surface grade.

The onsite cleanup levels are:

Soil Cleanup Levels

Tetrachloroethylene (PCE)	:	11.5 mg/kg
Trichloroethylene (TCE)	:	300.0 mg/kg
cis- 1,2 Dichloroethene	:	72.1 mg/kg
trans-1,2 Dichloroethene	:	87.3 mg/kg
1,1-Dichloroethene	:	7.1 mg/kg
Vinyl Chloride	:	2.1 mg/kg

Diesel Range Organics:	100.0 mg/kg
Gasoline Range Organics:	50.0 mg/kg
Benzene:	0.1 mg/kg
Benzene, Toluene, Ethylbenzene, Xylene (BTEX):	10.0 mg/kg
Total Petroleum Hydrocarbons:	2,000.0 mg/kg

Groundwater Cleanup Levels

The groundwater information collected for this site shows that there is a lower confined aquifer on-site beginning approximately 85 feet below surface grade which is currently being used as a drinking water supply for residents at River Terrace RV Park (RTRVP). The determination that the lower

2. No work is to be done on-site which penetrates the soil strata to allow contamination to the lower drinking water aquifer. Any work such as soil borings which may result in the penetration to this aquifer on-site must be approved by DEC prior to initiating such work.
3. A deed restriction must be recorded noting that the property is contaminated and that the groundwater aquifers between the surface grade and the lower artesian aquifer must not be used as a drinking water supply source for as long as the water levels exceed the drinking water maximum contaminant levels established under state and federal laws. A copy of the recorded restriction must be provided to this office within sixty (60) days from the date corrective action is determined to be complete by DEC.
4. Semi-annual sampling of your Class A public water system using EPA Method 524.2 to monitor for any impacts from the contamination to the drinking water aquifer. Sampling will need to begin in September 1997. The results of this testing can be used in part to satisfy your normal 18 AAC 80 sampling/reporting requirements for the chemicals analyzed. The frequency of sampling for this activity will continue for at least one year or until DEC determines the effectiveness of the corrective action(s). Please note that you will still need to comply with all sampling/reporting requirements in 18 AAC 80.
5. Quarterly sampling (i.e., in September, December, March and June) of the five groundwater monitoring wells on-site and the four groundwater monitoring wells in the Alaska Department of Transportation/Public Facilities Right-of-Way that were installed by E&E until the department determines that further sampling is not necessary. Samples will be analyzed by EPA Method 8260 for volatile organic compounds, and EPA Method 610 for the polynuclear aromatic petroleum hydrocarbons. EPA Method 8260 will be allowed to replace EPA Method 602 to analyze for monoaromatic hydrocarbons as specified in 18 AAC 70.020(b)(1)(C) under Note 8.
6. A work plan developed by your qualified third party scientist or engineer is to be submitted to DEC by September 15, 1997 regarding the drinking water and sentry well sampling activities. The work plan also needs to include conducting measurements to assist in determining the seasonal hydraulic relationship between the groundwater and the Kenai River. Procedures to be used will be specified in the E&E groundwater assessment report, which is expected to be finalized in early September and at that time, Mr. Rich Sundet of my staff will provide you a copy. All measurements and sampling will be done by your qualified third party scientist or engineer. The groundwater monitoring wells are currently locked and your consultant will need to obtain copies of the keys through Mr. Sundet (269-7578) upon approval of your work plan.

Expectations:

On August 7, 1997, Commissioner Brown provided you a copy of the Memorandum of Understanding (MOU) signed between DEC and EPA regarding providing regulatory oversight of the cleanup at the Site. DEC signed this agreement to coordinate the oversight of the immediate and long-term assessment and remediation activities that need to be conducted at this site. DEC intends to consult with EPA in the assessment and remediation activities conducted at the Site.

It is the department's expectation that engineering controls will be implemented prior to winter freeze-up this year under the AOC between you and EPA to protect the Kenai River from the groundwater contamination exceeding the cleanup levels established in this letter. It is also the department's expectation that the highly contaminated soil will be removed prior to winter freeze-up.

DEC will review the groundwater monitoring results annually beginning in October 1998 to determine if the levels of the contaminants of concern are attenuating towards the cleanup levels

August 27, 1997

established in this letter. Depending upon the results of these evaluations, DEC, in consultation with EPA, will determine if further remedial action, monitoring, or no further action will be required.

Flexibility:

The cleanup levels developed in the E&E report were based upon several assumptions in the equations used. DEC is willing to consider any alternative proposed models or assumptions that are submitted with sufficient information and analysis to permit reconsideration of the chosen levels.

If you have any questions or need further assistance, please contact Mr. Sundet in our Anchorage office at 269-7578.

Sincerely,



cw
Lynn J. Tomich Kent
Program Manager

RK:el

Enclosures: As stated

cc: Chris Kennedy, Attorney General's Office, Anchorage w/enclosures, hand delivered
Matt Carr, EPA, Anchorage w/enclosures, hand delivered
Edgar Paul Boyko, Anchorage w/enclosures, hand delivered
Rich Sundet, DEC/Anchorage w/out enclosures
Dan Breeden, ADOT, Anchorage w/enclosures, hand delivered
Keven Kleweno, DEC/Anchorage w/out enclosures

