

Box 234 Haines, AK 99827

(907) 303-7899

elijah@chilkatenvironmental.com

Steve Giesbrecht Borough Manager 12 South Nordic Drive PO Box 329 Petersburg, AK. 99833

Regarding: Petersburg AFS Tank Farm. ADEC File 1521.38.005

Steve,

Chilkat Environmental performed literature review and consultations to support Borough decision-making for the former tank farm at South Nordic Drive and submitted a letter with recommendations for the borough March 1, 2022. A copy of that letter is attached.

The final well sampling has now been completed, wells decommissioned, and the site responsibility transferred to Petro Marine. I discussed the site again with ADEC Project Manager, Rebekah Reams on 5/9/22 and she concurred that the next required action is submission of a formal closure request. Site closure under 18 AAC 75.380 requires submission of a report that explains site information and how closure requirements have been met.

Site closure is appropriate when efforts to reduce contamination have met approved cleanup levels, or the possibility of human exposure to any residual contamination is highly unlikely. Our understanding is that Petro Marine has a consultant that will prepare and submit the closure request. After ADEC approves closure, it is not anticipated that further environmental actions will be called for. As an institutional requirement for closure, there is a possibility ADEC may require future notification if excavation of subsurface soils is conducted and they may qualify that no drinking water wells should be installed there. These standard protections are not anticipated to impact planned property use.

I recommend Petersburg Borough proceed with their consideration of property exchange upon acceptance of site closure by ADEC.

Elijah Donat May 18, 2022

Principal Investigator

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Steve,

Chilkat Environmental performed literature review and consultations to support Borough decision-making for the former tank farm at South Nordic Drive. First built in the 1930s and rebuilt in the 1990s, the 0.4-acre site was used for bulk fuel storage until 2006. Tanks and infrastructure were removed by 2016 and what remains is a shop and parking area. Cleanup was performed in the mid 90's and included 6-feet of excavation under the 1930's tank farm. Polluted soil was shipped and stored on-site for treatment. The treatment of soil on site was not successful and about 1500yds3 were shipped in 2008. Further investigations of soil and shallow groundwater led to closure of the site by ADEC in 2012.

The property is owned by Petro Marine, however the responsible party for contamination is Chevron. As part of the environmental assessment performed for this land exchange some wells were located and sampled, encountering minor exceedences of cleanup levels intended to protect off site uses of groundwater for human consumption. Four sampling events were planned to characterize these shallow wells and three have occurred. Results show the site does not yet meet the Migration to Groundwater cleanup standards and that levels are consistent or decreasing.

Cleanup levels are based on how people are exposed to the pollution. This site has posed no risks to human health since cleanup in the mid 1990's because there are no downgradient uses of groundwater and all other cleanup levels were satisfied. Besides removing stockpiles in 2008, there have been no ADEC recommendations of further cleanup since those executed in 1996. Chilkat Environmental met with ADEC site manager Rebekah Reams, her supervisor Robert Burgess and Steve Giesbrecht on February 16, 2022. They explained that Chevron's contractor has one more quarterly monitoring well sampling event to perform. Afterwards, the contractor will provide recommendations. Decommissioning of the existing monitoring wells will be required by ADEC. The site is closed formally or closed with institutional controls limiting soil movement and excavation.

Chilkat recommends waiting for completion of the final summer 2022 monitoring event, acceptance of recommendation for closure by ADEC and decommissioning of wells before proceeding with property exchange.

Elijah Donat March 1, 2022 Principal Investigator