STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

FRANK H. MURKOWSKI, GOVERNOR

555 Cordova Street Anchorage, AK 99501 PHONE: (907) 269-7503 FAX: (907) 269-7649

http://www.state.ak.us/dec/home.htm

March 11, 2003

Mr. John Lindsay Pribilof Project Manager U.S. Department of Commerce, NOAA National Ocean Service Office of Response and Restoration 7600 Sand Point Way NE BIN C15700 Seattle, WA 98115-6349

RE: St. George Island Request for No Further Action Old Airport Hangar UST TPA Site No. 22-4, dated February 19, 2003

Dear Mr. Lindsay:

The Alaska Department of Environmental Conservation (the Department) received the above document on February 26, 2003. Based on our review of the information provided, the Department finds the Old Airport Hangar UST listed in the Two Party Agreement (TPA) as Site No. 22-4, does not pose a significant threat to human health or safety, or the environment. For your information, Department regulations concerning sampling at suspected releases from aviation fuel USTs typically requires additional sampling for diesel range organics (DRO), benzene, toluene, ethylbenzene, and xylenes (BTEX). There are no provisions in regulation to eliminate this sampling requirement based solely on analytical results obtained for gasoline range organics (GRO).

However, since confirmation soil samples did not detect any GRO above 13 mg/kg, it is highly unlikely that BTEX would be present above levels requiring further action. This fact combined with the past scoria mining activities at the site to depths below the previous locations of the UST and appurtenances, the Department has determined that no further investigation or sampling is required.

NOTE: Unless analytical data indicates otherwise, <u>all</u> future investigative/assessment/confirmation sampling activities for Method One cleanups on the Pribilof Islands involving aviation fuel sources shall include: DRO, BTEX and GRO analyses.

The Department is basing its decision on the most current and complete information provided by NOAA. The Department reserves its rights, under 18 AAC 75 Oil and Other Hazardous Substances Pollution Control regulations, 18 AAC 78 Underground Storage Tank regulations, and AS 46.03 to require the National Oceanic and Atmospheric Administration to perform additional investigation, cleanup, or containment if subsequent information indicates that

- (1) the cleanup is not protective of human health, safety, or welfare, or of the environment; or
- (2) the information the Department relied upon for its decision was invalid, incomplete, or fraudulent.

The Department requests that NOAA attach a copy of this letter with the document. Please contact me with any questions or concerns at (907) 269-7552.

Sincerely.

Louis Howard Project Manager

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