

ALAKANUK BIA DUMPSITE, SOUTH BANK ACTION PLAN



Prepared by

**Yukon River Inter-Tribal Watershed Council
Brownfields Tribal Response Program
815 2nd Avenue, Suite 201
Fairbanks, Alaska 99701**

December 29, 2006

Introduction

The Yukon River Inter-Tribal Watershed Council's (YRITWC) Brownfields Tribal Response Program was formed in 2005 to assist with the inventory and possible assessment of brownfields in the Yukon River watershed.

The Environmental Protection Agency (EPA) defines a brownfield as 'real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant.'

In Year One of the YRITWC Brownfields Program, twenty tribal governments in the Yukon River watershed expressed interest in completing a brownfield site inventory. The Alakanuk Traditional Council was among those entities and in the summer of 2006, the YRITWC Brownfields Program began collaborating with the Alakanuk Traditional Council on an inventory. The Alakanuk inventory identified 6 potential brownfield sites which included the Alakanuk BIA Dumpsite, South Bank.

In September, the Alakanuk BIA Dumpsite, South Bank was chosen from among 150 sites, between twenty communities, as one of the two top priority sites for Year One. Each priority site was to receive an Action Plan and Phase I Environmental Site Assessment (see *Appendix D*) through the YRITWC Brownfields Program.

Action Plan Overview

This document is an Action Plan. The general purpose of this Plan is to provide the Alakanuk community with relevant information to inform future decisions regarding the Alakanuk BIA Dumpsite, South Bank.

Specific objectives of the Plan include:

- To provide site-specific background and landownership information
- To summarize the major findings of the Phase I Environmental Site Assessment
- To outline recommended actions to address the Alakanuk BIA Dumpsite, South Bank
- To identify potential sources of funding for future assessment, cleanup and erosion control

The information contained in this Plan is based on the Phase I Environmental Site Assessment, land title records, and conversations with Alakanuk Traditional Council and City of Alakanuk staff.

The Plan is divided into five sections: *Background, Site Investigation and Findings, Recommended Actions, Potential Funding Opportunities, and Conclusion.*

I. Background

In September of 2006, the YRITWC began working with International Consulting & Engineering (ICE) to complete a Phase I Environmental Site Assessment for the Alakanuk BIA Dumpsite, South Bank. On October 13, the YRITWC Brownfields Program staff traveled with an environmental professional from ICE to Alakanuk as part of a site visit. Robert Alstrom, Tribal Administrator for the Alakanuk Traditional Council, accompanied us during the site visit and was present during assessment activities.

The Alakanuk BIA Dumpsite, South Bank is approximately 100-feet in length and located along the bank of the Alakanuk Pass, the major southern channel of the Yukon River. The legal description for the site is: *Lot 7, Block 4, Tract "B", U.S. Survey 4405, Townsite of Alakanuk, Alaska*. According to the land title records (see Appendix 16.4 of Phase I report) the site is owned by the City of Alakanuk.

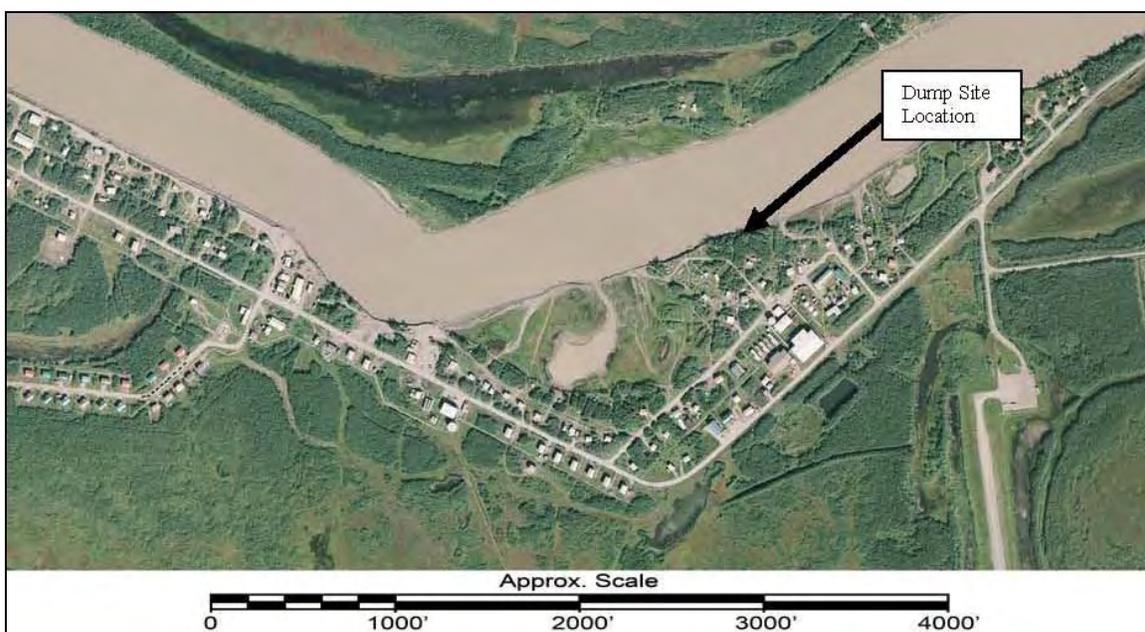


Figure 1 Aerial photograph of the site. Photograph by Aero-Metric, Inc.

The site is currently vacant. Its primary usage is as a boat landing for residents and some commercial fishermen. The Alakanuk community is physically divided by the Alakanuk Pass with most of the infrastructure located on the south bank and some residences on the north bank. In order for residents living on the north bank to access community facilities such as the school, council offices, and stores, they must commute across the river by boat. The site is one of the few areas suitable for a boat landing.

The proximity of the site to the Alakanuk Pass and connecting Yukon River is also of significance. Both rivers have, and continue to be, areas of heavy subsistence activity. According to information from the Alaska Division of Community Advocacy, 97.9% of the Alakanuk community is Alaska Native or part Native. Alakanuk is also active in both commercial and subsistence fishing.

II. Site Investigation and Findings



Exposed waste. Photo by YRITWC.

The Alakanuk BIA Dumpsite, South Bank was reportedly created by the contractors hired by the State of Alaska to build the Alakanuk High School (1975). The Alakanuk High School replaced an older school operated by the Bureau of Indian Affairs (BIA). According to the Phase I report, the site may have also been used as a disposal area during the demolition of the BIA school.

According to Shelby Edwin, City of Alakanuk operations, the dumpsite was originally a further distance from the Alakanuk Pass. Due to erosion however, wastes from the dumpsite are now exposed along a portion of the riverbank. Residents come into direct contact with wastes when accessing their boats. To reduce public risk, Mr. Edwin used an excavator to remove some of the plastic materials. While doing so, he reported observing 12-volt batteries and other possibly hazardous materials.

The following is a detailed summary of the observations documented in the Phase I report.

- *The dumpsite resembled a dumpsite with exposed waste materials falling into the river. The exposed face of the bump was about 80-feet in length. The exposed vertical face was about 4-feet in height. The face extended into the silty water column.*
- *There was a lot of visqueen like material exposed as well as a black plastic bags and some wood. There were also several apparently empty quart bottles of oil. Only the exposed face of the dump could be seen.*

The concluding opinion of the environmental profession in the Phase I report was, “Exposed wastes are eroding into an anadromous river on a continuous basis. No hazardous wastes or materials were observed in the exposed wastes, although there is likely a significant area of buried wastes that could not be seen. It is reasonable to believe that there are likely to be hazardous wastes or materials because of the primary source of the materials, a construction contractor. Additionally, it may be that wastes including asbestos materials or petroleum contaminated soils from the old BIA school may also have been disposed of at this site.”

Based on this information, we identified three recommended actions to help guide the Alakanuk community in making future decisions regarding the Alakanuk BIA Dumpsite, South Bank.

III. Recommended Actions

Action 1: Further assessment

The Phase I report concluded that additional investigation should be undertaken at the site. Due to the risks associated with the possible presence of propane bottles or other dangerous materials at the dumpsite, the Phase I report specifically stated that any work related to excavation should be planned and conducted under the direct supervision of a qualified superintendent. Such an investigation could include the activities listed on the following page.

- Obtain permission from the City of Alakanuk to sample
- Define the extent of dump area by excavating test holes at strategic locations as part of a site survey
- Identify the depth of the waste while also examining the actual wastes
- Maintain a Photo Ionization Detector (PID) on hand during excavations
- Have materials available for sampling potentially contaminated soils, 55-gallon drums, and other materials.



Bank of Alakanuk Pass. Photo by Simon Mawson.

Information on funding further assessment activities is included in the *Potential Funding Opportunities* section.

Action 2: Strengthen Redevelopment Goals

Alakanuk does not have a community plan and to our knowledge, there are no official redevelopment goals stated for the site. In our discussions with Alakanuk Traditional Council staff, several redevelopment ideas were put forward which included expanding the boat landing or restoring the site to a traditional use area.

Strong redevelopment goals could help enhance the site's potential as a brownfield project. They could also provide early insight into the appropriate cleanup level. For example, a site where the planned reuse is a storage area/facility may not be held to the same cleanup standard as if the planned reuse was a school or residential area. The following outlines a process designed to support the strengthening of redevelopment goals for the Alakanuk BIA Dumpsite, South Bank.

- Identify possible stakeholders (This may include the Alakanuk Native Corporation, Calista Corporation, Bureau of Indian Affairs, Lower Yukon School District, and others.)
- Organize community planning session(s) and invite landowner (City of Alakanuk) and stakeholders to discuss ideas for potential redevelopment goals
- Include redevelopment goals in future community plan(s)

Action 3: Erosion Control Funding

One of the concerns regarding the redevelopment potential in the area is active erosion along the bank of the Alakanuk Pass. The Phase I report identified riverbank erosion to be a "*substantial problem in Alakanuk.*" Addressing the erosion problem will be key to protecting the redevelopment potential of the site.

For more information on erosion control funding see the *Potential Funding Opportunities* section.

IV. Potential Funding Opportunities

There are several potential funding opportunities for assessment, cleanup and erosion control. The most common sources are summarized on the following page.

Assessment Funding

Targeted Brownfield Assessments

A Targeted Brownfield Assessment (TBA) is a site-specific study to determine the nature and extent of contamination. TBA's are available through the EPA. The value of EPA TBA's is approximately \$50,000. TBA's are available to public, quasi-public or non-profit entities interested in redeveloping abandoned or underutilized properties (*see Appendix B for TBA Site Questionnaire*). For more information visit: <http://www.epa.gov/swerosps/bf/tba.htm>.

DEC Brownfield Assessment (DBA)

The Alaska Department of Environmental Conservation (DEC) helps eligible applicants (city and borough governments, villages, tribal councils, Native corporations, and non-profits) identify environmental conditions that may preclude development at their properties through our DEC Brownfield Assessments (DBAs). This service identifies contamination at a property, summarizes how the contamination may limit future use, and provides an estimate of cleanup costs. DEC conducts several DBAs each year, using brownfield funding from EPA (*see Appendix C for DEC Brownfield Assessment Fact Sheet and Request Form*). For more information visit: <http://www.dec.state.ak.us/SPAR/csp/brownfields.htm#assess>.

EPA Brownfields Assessment Grants

EPA Brownfields Assessment Grants are a competitive grant. An eligible entity may apply for up to \$200,000 to assess a site contaminated by hazardous substances, pollutants, or contaminants (including hazardous substances co-mingled with petroleum) and up to \$200,000 to address a site contaminated by petroleum. For site specific proposals, applicants may seek a waiver of the \$200,000 limit and request up to \$350,000 for a site contaminated by hazardous substances, pollutants, or contaminants and up to \$350,000 to assess a site contaminated by petroleum. The performance period for an Assessment Grant is 3 years. For more information visit: http://www.epa.gov/swerosps/bf/assessment_grants.htm.

State & Tribal Response Program

All federally recognized Tribes, including Tribes in Alaska are eligible to request funding under the Brownfields State and Tribal Response Program. The goal of this funding is to ensure that tribal response programs include certain elements that help build program capacity to address and manage contaminated lands. Individual request may be made up to \$1.5 million to cover a one year project period. For more information visit: http://www.epa.gov/swerosps/bf/state_tribal.htm.

Cleanup Funding

EPA Cleanup Grants

EPA Cleanup Grants may be awarded up to \$200,000 per site for cleanup. Due to budget limitations, no entity may apply for funding cleanup activities at more than three sites. Applicants must submit a separate proposal for each site. The performance period for a Cleanup Grant is 3 years. By statute, cleanup grant recipients and revolving loan fund subgrant recipients must own these sites at the time of grant or subgrant award. For purposes of grant eligibility and the guidelines only, ownership is fee simple title. Other

arrangements may be considered on a case-by-case basis. For more information visit:
http://www.epa.gov/swerosps/bf/cleanup_grants.htm.

Erosion Control Funding

Alaska Baseline Erosion Assessment

The U.S. Army Corps of Engineers is conducting a study to provide an overall assessment of erosion in the State of Alaska. The Corps, working with the State, Federally recognized Tribes, and other stakeholders, is developing this baseline study to provide a measured assessment of erosion issues in Alaska. This study will provide communities affected by erosion with an estimated erosion rate map, potential recommendations, and guidance for implementation on ways they can address their concerns. For more information visit:
<http://www.alaskaerosion.com/>.

V. Conclusion

Implementing this Action Plan will require a degree of commitment from the city and tribal governments as well as other stakeholders. Often the most successful brownfield projects are those that have the support of local people and entities who are willing to “champion” the project and keep interest in it ongoing. Taking action to address the various environmental concerns associated with the Alakanuk BIA Dumpsite, South Bank could result in many community benefits.

Appendix A

Resource Contacts

Yukon River Inter-Tribal Watershed Council
Contact Person: Charlene Stern, Brownfield Program Manager
815 2nd Avenue, Suite 201
Fairbanks, AK 99701
Phone: 907-451-2558
Email: cstern@yritwc.com

Yukon River Inter-Tribal Watershed Council
Contact Person: Sonta Hamilton, Brownfield Technician
Phone: 907-451-2549
Email: shamilton@yritwc.com

International Consulting & Engineering LLC
Contact Person: Simon J. Mawson, P.E., Engineering Manager
P.O. Box 119050
Anchorage, AK 99511
Phone: (907) 345-9625
Email: NorthernICE@gci.net

Alakanuk Traditional Council
Contact: Robert Alstrom, Tribal Administrator; Jackie Alstrom, Environmental Assistant
P.O. Box 149
Alakanuk, AK 99554
(907) 238-3419

City of Alakanuk
Contact: Paul Joe
P.O. Box 167
Alakanuk, AK 99554
(907) 238-3313

ADEC Spill Prevention and Response
Contact Person: John Carnahan, Brownfield Coordinator
610 University Avenue
Fairbanks, Alaska 99709
Phone: (907) 451-2166
Email: John_Carnahan@dec.state.ak.us

Susan Morales, Brownfield Coordinator
U.S. EPA - Region 10
1200 Sixth Ave. (ECL-112)
Seattle, Washington 98101
Phone: (206)553-7299
Email: morales.susan@epa.gov

Appendix B
Targeted Brownfield Assessment Site Questionnaire

TARGETED BROWNFIELDS SITE ASSESSMENT QUESTIONNAIRE

ORGANIZATION: Name and address. Also provide the name of the contact person along with their telephone and fax numbers.

SITE: Name, address and site acreage. Please attach a site map that indicates the site's location in the community, adjacent land uses and areas of known or suspected contamination.

CURRENT SITE OWNERSHIP: Name, address and telephone number (if known). If the property is owned by the applicant, was it acquired by foreclosure or other means? If by other means, please explain.

If the property is not owned by the applicant, does the applicant envision difficulty in obtaining legal permission to enter the property to conduct site assessment activities? Please explain.

SITE HISTORY: Provide a brief summary of the site's history, including past uses, ownership and potential or known contamination issues.

REGULATORY HISTORY: Is the applicant or any other party under order from EPA or State agency to conduct site assessment and/or cleanup? If the answer to this question is yes, please describe.

Briefly describe the involvement of the state environmental agency (e.g., WDOE, ODEQ, ADEC, IDEQ) in enforcement and/or oversight of assessment and cleanup activities at the candidate site. Please provide the name of a site contact and their telephone number.

REDEVELOPMENT POTENTIAL: Provide a brief discussion of the redevelopment potential of the property and the importance of the property to the community. *How will the public benefit from this assessment?*

MUNICIPAL COMMITMENT: Is there a strong municipal commitment—either financially, or through commitment of municipal resources, for other components of the project?

PRIOR SITE ASSESSMENT ACTIVITIES: If prior site assessments have been conducted, please describe the conclusions (or attach “conclusion” section of report(s)). If reports are unavailable, identify consultant, client and the approximate date of the study. If no prior site assessments have been conducted, or if it is not known, please indicate.

SITE ASSESSMENT NEEDS: Specify site assessment activities being requested and why is EPA assistance necessary for the site’s redevelopment. Also, please indicate the time frame in which this work is needed.

- G A screening (Phase I) assessment, including a background and historical investigation and a preliminary site assessment
- G A full (Phase II) site assessment, including sampling activities to identify the types and concentrations of contaminants and the areas of contamination to be cleaned up
- G Establishment of cleanup options and cost estimates based on future uses and redevelopment plans

SITE CLEANUP: Are there mechanisms available for adequate site cleanup? Please note, that EPA cannot provide funds for cleanup.

FOR PRIVATELY OWNED SITES: Did the current owner conduct or allow activities that may have resulted in its contamination?

Is the current owner unwilling or unable to conduct an assessment?

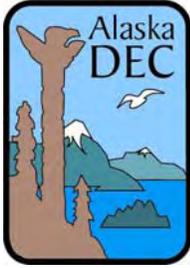
What cost-sharing reimbursement mechanisms may be feasible for this site? For example, provision of in-kind services; reduction in the purchase price of the property; commitment to pay for, or conduct, or contribute to cleanup activities.

SUBMIT COMPLETED FORMS TO :

BROWNFIELDS TARGETED SITE ASSESSMENTS
c/o Joanne LaBaw
U.S. Environmental Protection Agency - Region I0
1200 Sixth Ave. (ECL-115)
Seattle, WA 98101

Appendix C

DEC Brownfield Assessment Fact Sheet & Request Form



BROWNFIELD ASSESSMENTS FACT SHEET

May 2006

What is a DEC Brownfield Assessment? The Alaska Department of Environmental Conservation (DEC), with support from Region 10 EPA, wishes to assist non-profits, municipalities, local governments, and their communities by conducting environmental site assessments at potential brownfield sites. A brownfield site is a property where actual or potential environmental problems complicate site redevelopment. The intent of DEC Brownfield Assessments (DBAs) is to help reduce the environmental uncertainties associated with potential brownfield properties. DEC will pay for a contractor to conduct the work. The objectives of the DBA are the following:

- Determine whether a site is clean, slightly contaminated, or heavily contaminated
- Determine the nature and extent of contamination and its possible impact on the potential use of the property
- Identify potential cleanup options for the site, or further assessment requirements
- Provide an estimation of the cleanup costs (if any)

Who is eligible to apply? DBAs are available to local government, economic development districts or corporations, non-profit entities (such as community development organizations), Native corporations, and other government entities created by the State Legislature. The applicant must not have caused or contributed to the contamination at the site. The applicant does not have to own the site to apply.

What sites are eligible? All brownfield sites are eligible to participate if proposed by an eligible applicant. The DEC places a preference on property that is publicly owned with community-supported redevelopment plans in place. A brownfield site that is privately held may still be considered by DEC, but only if the project offers significant public benefit and EPA supports the effort.

How are projects selected? The selection process is guided by criteria used to help establish relative priorities among the properties in Alaska. The criteria include the following:

1. Property redevelopment is hindered by actual or perceived environmental impacts.
2. Property is owned by a local government entity or non-profit and the owner is not responsible for the contamination.
3. Viable redevelopment plans and community support for property revitalization exist.
4. The site has clear access.
5. The planned reuse has a clear economic or social benefit.
6. The site is currently abandoned or underutilized, not meeting its economic potential.
7. The potential cost of the assessment effort is within our funding capacity.

How do I apply? You must complete and submit a *DEC Brownfield Assessment Request Form*. Annual application periods and deadlines for submittal will be posted on DEC's brownfield website at <http://www.dec.state.ak.us/spar/csp/brownfields.htm>. DEC recommends that you work with our brownfield staff when completing your form. Once completed, email your form to John Carnahan, brownfield coordinator, at John_Carnahan@dec.state.ak.us or fax your request to John at (907) 451-2155. When evaluating your request, DEC staff may contact you for additional information.

Additional information and assistance: The selection of a site for a DEC Brownfield Assessment is in no way intended to imply that the DEC is accepting liability for any contamination that may exist at the site, nor is DEC responsible for any necessary cleanup of hazardous substances that may be found at the site. If you have any questions regarding this program or the application process, please call John Carnahan at (907) 451-2166 (John_Carnahan@dec.state.ak.us) or Sonja Benson at (907) 451-2156 (Sonja_Benson@dec.state.ak.us). Please see our website for additional information at:

<http://www.dec.state.ak.us/spar/csp/brownfields.htm>

Prior Site Assessment Activities: Please describe any prior site assessment activities at the site and briefly list the conclusions. Attach the summary or conclusion sections of the reports to this questionnaire. If reports are unavailable, identify the consultant, client, and approximate date of the study. If no prior site assessments have been done, or if this is not known, please indicate.

Site Assessment Needs: Specify site assessment activities being requested and why DEC assistance is needed for redevelopment of the site. Also, please indicate when completion of this work is needed.

Site Cleanup: Please indicate if resources are available for adequate site cleanup if necessary.*

**The selection of a site for a DEC Brownfield Assessment is in no way intended to imply that the DEC accepts liability for any contamination that may exist at the site, nor is DEC responsible for any necessary cleanup of hazardous substances that may be found at the site.*

Submit Completed Forms to:

By email: John_Carnahan@dec.state.ak.us or Sonja_Benson@dec.state.ak.us
By fax: (907) 451-2155 c/o John Carnahan or Sonja Benson

Or by regular mail:
DEC Brownfield Assessments
c/o John Carnahan or Sonja Benson
Department of Environmental Conservation
610 University Avenue
Fairbanks, Alaska 99709

If you have questions, call John Carnahan at (907) 451-2166 or Sonja Benson at (907) 451-2156

Appendix D

Phase I Environmental Site Assessment

**Phase I Environmental Site Assessment
Alakanuk BIA Dumpsite, South Bank
Alakanuk, Alaska**

Prepared For
**Yukon River Inter-Tribal Watershed Council
Brownfield's Tribal Response Program
815 2nd Avenue, Suite 201
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Terminology or List of Acronyms

ANCSA	Alaska Native Claims Settlement Act
ASTM	American Society for Testing Materials
BIA	Bureau of Indian Affairs
EDR	Environmental Data Resources, Inc.
ICE	International Consulting & Engineering LLC
LUST	Leaking Underground Storage
UST	Regulated Underground Storage Tank
MLT	Municipal Land Trustee
RECs	Recognized Environmental Conditions
YRITWC	Yukon River Inter-Tribal Watershed Council

1 Executive Summary

International Consulting & Engineering LLC (ICE) conducted this Phase I Environmental Site Assessment for the Yukon River Inter-Tribal Watershed Council (YRITWC) Brownfield's Tribal Response Program. The assessment was undertaken to obtain information on environmental issues related to past and current use of a dump site within the Municipality of Alakanuk.

The site investigated is an old dump (circa 1975) that is becoming exposed in the Alakanuk Pass of the Yukon River by seasonal erosion of the riverbank. Wastes from the dump are exposed along an approximately 100-foot stretch of the river.

The property is reportedly owned by the City of Alakanuk. The property was transferred to the City as part of a Municipal Reserve in compliance with Section 14(c)(3) of the Alaska Native Claims Settlement Act (ANCSA) of 1972. The area is currently utilized as a boat landing location for residents and some commercial fishermen.

The dump was created by the contractors working for the State of Alaska who built the Alakanuk High School in 1975. This State of Alaska operated school replaced the Bureau of Indian Affairs (BIA) which had previously been operated by the Federal Government.

The dump likely contains wastes that are typical of a large construction job occurring in a remote Alaska community without a permitted landfill and where shipping wastes out of the community was very expensive. These would include but are not limited to wood, metal, plastics, paints, urethane precursors, glues, mastics, batteries and petroleum, oils and lubricants.

The dump has likely also been used by others since 1975, including possibly the contractors who demolished the old BIA school.

The future planned use of the property includes an expanded boat landing and/or traditional use area.

Because the only visible wastes are those exposed at the river interface, it is not possible to confirm the contents without further sampling. This report finds that further assessment activities would be appropriate.

2 Introduction

ICE staff under contract to the YRITWC undertook this Phase I Environmental Site Assessment. Staff from CHEMTRACK LLC have also assisted with the gathering of relevant information and technical review of written materials. Efforts were coordinated with Charlene Stern of the YRITWC. Ms. Stern was present during all on-site activities.

2.1 Purpose

The purpose of this site assessment included the identification of recognized environmental conditions (RECs) on the subject property/surrounding properties and an evaluation regarding the potential impact and liabilities affecting subject property users, contiguous property owners, and prospective purchasers. This site assessment was conducted in accordance with the Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process per American Society for Testing Materials (ASTM) E 1527-05.

RECs include the presence or likely presence of hazardous substances and/or petroleum products under conditions that indicate a release or a material threat of release into structures on the property or into the ground, groundwater, or surface water of the property. *De minimis* amounts of materials are not included under the RECs.

2.2 Scope of Services

The scope of services under this site assessment included a thorough review of site historical information, review of State/Federal/Local government agency contaminated sites databases, review of other reasonably ascertainable public records, interviews with subject property users, and site visit observations and inspection findings.

2.3 Significant Assumptions

It was assumed that the information provided by those interviewed and the State of Alaska was accurate. Additionally it was assumed that the information presented on State of Alaska Community Profiles was accurate.

2.4 Limitations and Exceptions

The findings of this assessment are limited to information collected from State and Federal databases and other reasonably ascertainable public records as of September 30, 2006. In addition, site inspection findings and observations were conducted on October 13th 2006 and conditions may have changed after that date.

2.5 Special Terms and Conditions

There are no special terms and conditions.

2.6 User Reliance

This report is written for reliance by the Yukon River Inter-Tribal Watershed Council, The Alakanuk Traditional Council, the Alakanuk Native Corporation and the City of Alakanuk who have a common interest in seeing this dump site cleaned up.

3 Site Description

Alakanuk is accessible only by water or by air in the summertime. The Yukon River is used as an ice-road during freeze-up, from November through May. It is located at the east entrance of Alakanuk Pass, the major southern channel of the Yukon River, 15-miles from the Bering Sea. It is part of the Yukon Delta National Wildlife Refuge. It lies 8-miles southwest of Emmonak, approximately 162 air miles northwest of Bethel. It is the longest village on the lower Yukon – the development stretches over a 3-mile area along the Pass. Riverbank erosion is a substantial problem in Alakanuk.

Alakanuk lies at approximately 62.6888890 degrees North latitude and 164.615280 degrees West Longitude. (Sec. 14, T030N, R082W, Seward meridian). Alakanuk is located in the Bethel Recording District. The area encompasses 32.4 square miles of land and 8.7 square miles of water. The climate is sub-arctic, averaging 60-inches of snowfall and 19-inches of total precipitation per year. Temperatures range from minus 25 to 79 degrees Fahrenheit.

3.1 Location and Legal Description

The site is located on the riverbank as identified in photograph 1 and within United States Survey Number 4405, Alakanuk Town site 50-73-0037.

3.2 Site and Vicinity General Characteristics

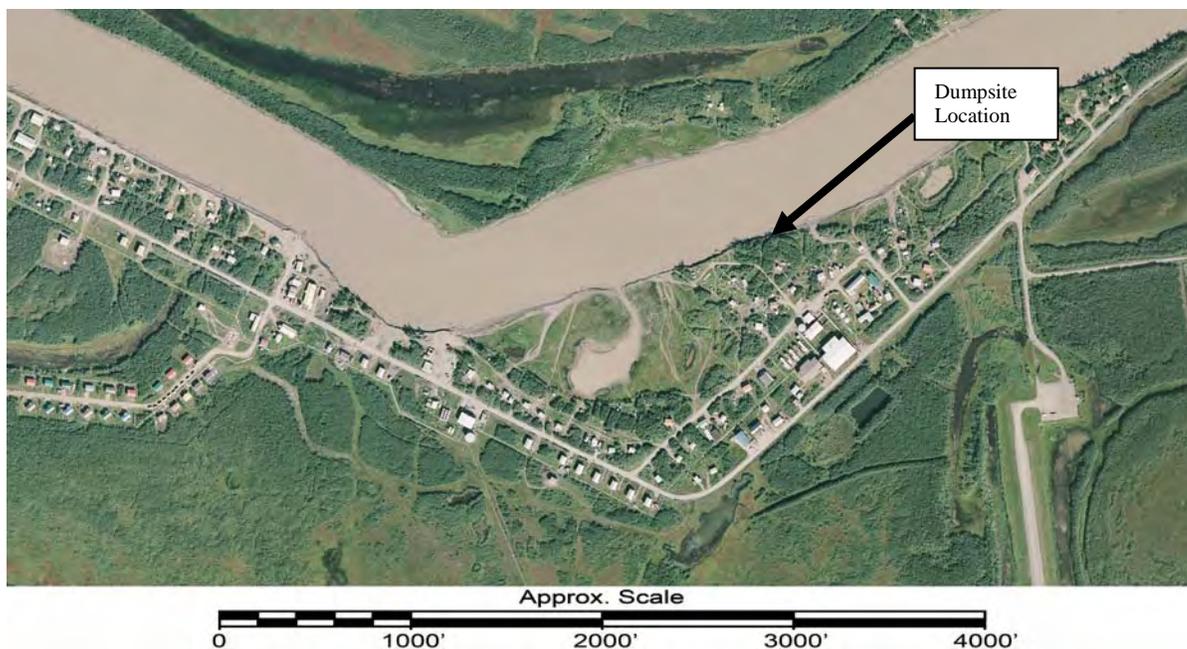
The site is adjacent to the Alakanuk Pass of the Yukon River in an area of riverbank erosion. It is likely that at one time, the entire dump was covered by soil. As the riverbank has eroded, the dumped materials have been exposed. Soils in the area are almost exclusively silty sand and sandy silt, the sediments that have accumulated from the Yukon River overtime. Continuing erosion exposes more wastes as time goes by. The site is adjacent to property transferred to the City of Alakanuk through the 14(c)(3) process of the Alaska Native Claims Settlement Act (ANCSA).

3.3 Current Use of the Property

The property is currently used as a boat landing for residents and commercial fishing boats. The community is divided by the Alakanuk Pass with most of the infrastructure located on the south bank and some residences on the north bank. For residents living on the north bank to access community facilities such as the school, council offices, and stores, they must commute across the river by boat. The site investigated is one of the few areas suitable for a boat landing.

3.4 Description of Structures, Roads, Other Improvements on the Site

There are no structures at the site and only trails useable by pedestrians and all terrain vehicles.



Photograph 1, Location of Dumpsite

3.5 Current Uses of the Adjoining Properties

The river adjacent to the dumpsite is used for mooring boats and as a transportation corridor from the boat area to the rest of the community. Adjacent lots are subdivided but have not yet been developed. These lots could be sold or leased by the City.

4 User Provided Information

See Appendix 16.3

5 Records Review

An Environmental Data Resources, Inc. (EDR) search was not done for this location. CHEMTRACK staff contacted EDR and were informed that such a search was unlikely to yield useful information for a remote community like Alakanuk. Rather, we conducted a basic search of the databases listed below.

5.1 Federal Databases/Lists

General EPA databases were searched. These included the National Priority List (NPL) and lists which contain superfund sites. It is not practical to search these databases without spill numbers or other specific information. The subject site was not listed on the searched Federal databases. The authors experience is that these types of searches are seldom effective in remote Alaska Native Communities that lack the infrastructure of typical communities or industrial areas, not to mention the regulatory oversight.

5.2 State of Alaska Databases/Lists

State of Alaska Department of Environmental Conservation databases were searched. These databases included the Leaking Underground Storage Tanks List (LUST), the Underground Storage Tank List (UST) and the Contaminated Sites database. The subject site was not listed on any of the searched State databases.

5.3 Topographic Information

Alakanuk is located in the Yukon River delta on river sediments that have accumulated over the years. The topography is very flat and composed of sandy silt. The only topographical anomalies are the channels; old and new that have been carved by the river.

5.4 Historical Information

Alakanuk is a Yup'ik Eskimo community. Alakanuk is a Yup'ik word said to mean, "wrong way" aptly applied to a village on this maze of watercourses. G.R. Putnam of the United States Coast and Geodetic Survey first reported the village in 1899. A Yup'ik man named Anguksuar and his family originally settled it. A catholic mission school was built near the village. A post office was established in 1946. In 1948, the school was relocated to St. Mary's, and many families moved from the old school site to Alakanuk. It incorporated as a second-class City in 1969.

6 Site Reconnaissance

A site visit was made to Alakanuk by Simon Mawson of ICE and Charlene Stern of YRITWC on October 13, 2006. Robert Alstrom, Tribal Administrator for the Alakanuk Traditional Council, identified the site to be assessed and accompanied us during all phases of the assessment.

6.1 Methodology and Limiting Conditions

An ICE staff member traveled to the site on October 13, 2006 accompanied by Robert Alstrom and Charlene Stern. YRITWC staff had previously visited the site on July 12, 2006 as part of a larger inventory of potential Brownfield sites.

Methods employed included walking to the site and walking over the site. Looking for and photographing materials and conditions that were observed. Talking to the Tribal Administrator and YRITWC staff, observing waste materials exposed by river erosion, vegetation in the area, the use of the area for boat mooring and weather conditions.

6.2 General Site Setting

The setting is the interface of the land and the water. The land is sandy silt, essentially flat, easily eroded by the river, populated with scrub bushes like willows and alders as well as grasses and intersected by four-wheeler and snow machine trails. The riverbank dropped approximately 8-feet to the edge of the Alakanuk Pass, a swift flowing and highly silty channel of the Yukon River close to its terminus at the Bering Sea.

6.3 Exterior Observations

The dumpsite resembled a dumpsite with exposed waste materials falling into the river. The exposed face of the bump was about 80-feet in length. The exposed vertical face was about 4-feet in height. The face extended into the silty water column and it was not possible to see how far the waste face extended into the water column.

There was a lot of visqueen like material exposed as well as black plastic bags and some wood. There were also several apparently empty quart bottles of oil. Only the exposed face of the dump could be seen.

6.4 Interior Observations

No interior observations were made.

7 Interviews

Robert Alstrom accompanied us during the site assessment and interviews with him were equivalent to a series of discussions during the investigation. At 1:30 p.m. Mr. Alstrom introduced us to Shelby Edmond who runs City of Alakanuk operations.

Both Mr. Alstrom and Mr. Edmond told us that the dumpsite was originally developed in 1975 when the State High School was built to replace the old school formerly operated by the BIA. As is typical of communities like Alakanuk, contractors usually do not have permitted disposal facilities for disposing of the myriad of wastes and excess materials that accumulate after construction projects. It is likely that the closest permitted facility was in Anchorage, which would have been a very expensive trip. A more common practice of the time was to illegally and improperly dispose of wastes at the local dump, or in the case of Alakanuk, dig your own unpermitted dump and then use it.

Mr. Edmond further explained to us that the dumpsite originally was some distance from the river. He explained that river erosion had exposed the waste materials over time. He also told us that he had used an excavator to remove some of the plastic materials at the dumpsite to make it safer for people climbing in and out of their boats and had observed 12-volt batteries and other possibly hazardous materials in the dumpsite. He further stated that wastes from the BIA school may also have been dumped at the site during building demolition.

This information was not surprising because it is likely that the school contractor dumped all of the wastes left over after construction of the school as well as those produced during construction. Because there are no hardware stores in communities like Alakanuk, contractors have to bring in all of the materials used.

8 Findings

There is a dumpsite exposed to the Yukon River. The materials observed seemed to support the information from residents that were interviewed that the dump was created by a school contractor in 1975 for disposing of wastes left over after the construction of the school. While no hazardous materials were observed, it is likely that there are hazardous materials like paint, urethane precursors and other noxious construction products buried at this site. The materials are entering the Yukon River more and more each year as the riverbank erodes.

The area is used for mooring boats and as a boat landing.

9 Opinion

There is an obvious solid waste problem at this site. Exposed wastes are eroding into an anadromous river on a continuous basis. No hazardous wastes or materials were observed in the exposed wastes, although there is likely a significant area of buried wastes that could not be seen. It is reasonable to believe that there are likely to be hazardous wastes or materials because of the primary source of the materials, a construction contractor. Additionally, it may be that wastes including asbestos materials or petroleum contaminated soils from the old BIA school may also have been disposed of at this site.

10 Conclusions and Recommendations

Additional investigation should be undertaken at this site. The first level of effort at this site should focus on defining the area of the dump and the depth to which it reaches. The best way to accomplish this work would be with the excavator owned by the City of Alakanuk. Test holes can be excavated at strategic locations designed to identify the extent of the dump area.

The second level of effort should be to identify the depth of the wastes in the dump. While this effort is underway, wastes should be examined and identified. Great care must always be taken when excavating in dump areas because of the risks of damaging propane bottles or other dangerous materials. This work should be planned and conducted under the direct supervision of a competent and qualified superintendent. Screening devices like a Photo Ionization Detector (PID) should be available on hand. Sampling materials should also be on hand for sampling potentially petroleum contaminated soils, 55-gallon drums and other materials which might reasonably be expected to be in an old rural Alaska dump.

The extent of the dump and the location of test holes should be located as part of a site survey. It may be that test holes will have to be filled in again while a remedial action plan is developed.

Local resources, including heavy equipment are available to do the work. Because of the remoteness of Alakanuk, it is expensive to ship in heavy equipment or drill rigs, etc. and local equipment should be used when possible.

11 Deviations

The most significant deviation of this report is to not conduct a detailed search of databases, other than those listed in the relevant sections. The reasons for this have been explained previously.

12 Additional Services

No additional services have been provided.

13 References

Reference documents include:

- Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM Designation ASTM E 1527 – 05) And State and Federal databases??
- Technical Aspects of Phase I/II Environmental Site Assessments ASTM Document MNL43

14 Signature of Environmental Professional

Simon J. Mawson MS, PE _____

15 Qualifications of Environmental Professional

PO Box 110950
Anchorage, Alaska 99511

Phone (907) 345-9625
Fax (907) 348-9625
E-mail NorthernICE@gci.net

Simon J. Mawson, P.E.

Education M.S. Environmental Engineering, Washington State University, Pullman, Washington, 1980

B.A. Biology, Alaska Methodist University, Anchorage, Alaska, 1973

Professional Registration Professional Civil Engineer, State of Alaska, CE9395

Professional Civil Engineer, State of Hawaii, CE12088

HAZWOPER Certified

Qualified Sampler

Certified Sanitary Survey Inspector.

Professional Experience **2000-Present:** Engineering Manager and minority partner in International Consulting & Engineering LLC, a Civil/Environmental Engineering and Construction Management Firm.

Responsible for all engineering, permitting and construction management work including marketing, negotiating contracts, subcontracts and joint ventures, business planning, cost benefit analyses, permitting, design, inspection, supervision of Construction Superintendents and cost accounting. Also responsible for completing feasibility studies/master plans and environmental reports and responding to Statements of Qualifications and Requests for Proposals. Some projects include:

Underground storage tank removal, remedial action planning and implementation at the Jim Lathrop property, Tope Equipment and Hardrives paving Company.

SPCC plans for Bethel Native Corporation.

Contaminant transport investigation from the Haines Fuel Terminal and contaminant assessment of subsistence foods for Chilkoot Indian Association.

Environmental Report for Red Devil, Alaska.

Solid Waste permitting, including Wildlife Hazard Assessment and Archaeological Assessment for Red Devil, Alaska and Tanacross.

Soil contamination assessment for old Crowley tank farm, Hooper Bay.

404 permitting for City of Nome small boat harbor and causeway.

Compliance sampling of numerous thermally remediated soil piles for CHEMTRACK.

Teach 40 hour HAZWOPER Class

Computer literate with Microsoft Office Programs, use of digital cameras and report writing software. Some familiarity with drawing software like Visio, golden software and the payroll program Quickbooks Pro.

1981-2000 Employed as an Environmental Engineer and later Regional Manager by the State of Alaska Department of Environmental Conservation (ADEC). Started career in the Facilities Construction & Operation Division reviewing plans and specifications for water and sewer facilities in South-Central Alaska. Later managed the Wastewater Permitting Program for the South Central Region. Issued permits for municipalities, mining operations, seafood processors and the oilrigs in Cook Inlet. Undertook study of the effects of untreated seafood waste discharges into Akutan Bay. Compared the impacts of deep discharge of seafood wastes versus shallow discharge in Dutch harbor.

In 1982 moved to Nome as the District Engineer for ADEC. This district included the area from Stebbins on the south of Norton Sound to Kivalina on the Chuckchi Sea, as well as the communities of the Noatak and Kobuk Rivers and the Seward Peninsula, St. Lawrence Island and Little Diomede.

Responsible for regulating all air quality, drinking water, wastewater, solid waste, hazardous wastes, fuel storage as well as spill response and spill planning in all communities and all industrial facilities like mines and seafood processing facilities. Became familiar with State and Federal environmental and health regulations. Involved with Red Dog Mine permitting and inspection from EIS through pre-construction and exploration activities to full operation.

Responsible for overseeing cleanup of all oil and hazardous substance spills, including 100,000 gallon fuel oil spill in Kotzebue and 40,000 gallon unleaded gasoline spill in Nome, 10,000 gallon fuel oil spills in Savoonga and at St. Michael as well as numerous smaller spills. Worked as Shoreline Cleanup Supervisor for the Exxon Valdez Spill in Prince William Sound during the summer of 1989.

In 1990 returned to Anchorage to become the ADEC Pipeline Coordinator. Joined a State and Federal inter-agency office responsible for regulating all State and Federal matters on the North Slope, along the pipeline corridor, at the Alyeska Valdez Marine Terminal and the oil tankers traveling Prince William Sound.

Managed a professional staff of approximately 25 people including engineers and environmental scientists in a regional office and two district offices, one in Valdez and another on the North Slope. Programs regulated included air quality, drinking water and wastewater, RCRA, oil spill contingency planning, contaminated sites, oil spill response and solid waste. Facilities regulated included exploration and production facilities on the North Slope, the Trans Alaska Pipeline system, including the pump stations and the Valdez Marine Terminal (VMT) including the tankers that sailed through Prince William

Sound.

Managed the office budget, became familiar with the Fair Labor Standards Act and other Human Resources issues delegated tasks and authorities effectively so that prioritized work was accomplished timely. Worked with staff to assess multiple projects tasks and demands. Coordinated efforts with other State and Federal agencies, the Oil Industry and a public advocacy group, the Prince William Sound Regional Citizen's Advisory Council. Interacted with the citizens Technical Assistance Team (TAT) required as a part of the wastewater discharge permit for the Ballast Water Plant for the VMT

ADEC Incident Commander for the Exxon Valdez spill through 1992

Objective

References:

Randy Romenesko, City Manager, Nome, Alaska (907) 443-5717

Jerry Brossia, Authorized Officer, USBLM Pipeline Office (907) 257-1300

Anne Walker, President International Consulting & Engineering (907) 345-9625

Chuck Ronan, Owner CHEMTRACK Inc. (907) 244-0581

16 Appendices
16.1 Photographs



**Photograph 2
Dumpsite**



Photograph 3
Notice how the waste material extends under the water



Photograph 4
Commercial Fishing Boat Moored at the Dumpsite

16.2 Maps

16.3 User Provided Information

According to the land title search (see Appendix 16.4), the property is owned by the City of Alakanuk and there are no known environmental liens or activity and use limitations on the property. The property has no occupants.

The YRITWC is unaware of any specialized knowledge or experience that is material to recognized environmental conditions in connection with the property. Similarly, the YRITWC is unaware of any commonly known or reasonably ascertainable information within the local community about the property that is material to recognized environmental conditions in connection with the property.

The purpose of performing the Phase I Environmental Site Assessment is to respond to the local environmental concerns associated with the site and to assist the Alakanuk Traditional Council in identifying any recognized environmental conditions. No commercial transactions are planned in connection with this Phase I report.

16.4 Land Title Records

SCHEDULE A

Title to said estate or interest at the date hereof is vested in:

City of Alakanuk

The estate or interest in the land hereinafter described or referred to covered by this Guarantee is:

Fee Simple Estate

The land referred to in this Guarantee is situated in the State of Alaska , Bethel Recording District, and is described as follows:

Lot 7, Block 4, Tract "B", U.S. SURVEY 4405, TOWNSITE OF ALAKANUK, ALASKA, according to the official plat thereof, filed under Plat Number 69-12A, Records of the Bethel Recording District, Fourth Judicial District, State of Alaska.

SCHEDULE B

EXCEPTIONS:

1. Reservations or exceptions in patents or in acts authorizing the issuance thereof.
2. Subject property does not lie in a taxing district.
3. Reservation of all oil, gas and mineral rights as reserved in an instrument
Recorded: September 27, 1972
Recording Information: Book 19 Page 32
4. Rights of the public and/or governmental agencies in and to any portion of the above described real property lying within the Municipal Reserve as shown on plat of record.

NOTE: THIS GUARANTEE IS RESTRICTED TO THE USE OF THE ASSURED HEREIN AND IS NOT TO BE USED AS A BASIS FOR CLOSING ANY TRANSACTION AFFECTING TITLE TO SAID PROPERTY.

SCHEDULE C

The necessary parties (other than those having a claim or interest by reason of matters shown in Exception number(s) n/a, inclusive) to be made defendants in an action to Judicially foreclose the Deed of Trust shown as exception number herein, said action to be brought by are as follows:

- A. n/a

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

BOOK 23 PAGE 634
Bethel Recording District

TRUSTEE DEED

THIS INDENTURE, made this 20th day of May, in the year of our Lord one thousand nine hundred and seventy-seven, by and between George E. M. Gustafson, as trustee for the townsite of Alakanuk, U. S. Survey Number 4405, in the State of Alaska, party of the first part, and City of Alakanuk, Alaska, party of the second part,

WITNESSETH, That said party of the first part, as such trustee, by virtue of the power vested in and conferred upon him by the terms of section 11 of the Act of Congress approved March 3, 1891 (26 Stat. 1095), and the regulations thereunder and the patent issued to him thereon, and in consideration of the sum of \$1000.00 dollars, the receipt of which is hereby acknowledged, by these presents does grant, convey, and confirm unto the said party of the second part and its successors all the following lot XXXX, piece XXXX, and parcel XXXX of land situate in the townsite of Alakanuk, State of Alaska, described as follows, to-wit: Lots One (1), Two (2), Three (3), Four (4), Five (5), Six (6), Seven (7), and Eight (8), Block Four (4), Tract "B", as shown on the official plat of U. S. Survey 4405, Townsite of Alakanuk, as accepted by the Chief, Division of Engineering, for the Director on October 17, 1968.

770312
5-12
RECORDED-FILED
BETHEL RECORDING
DISTRICT
MAY 24 8 47 AM '77
REQUESTED BY BLM
550 Cordova St
ADDRESS ONLY

According to the official plat of survey of said townsite, subject to rights and reservations in said patent expressed. To have and to hold the same, together with all and singular the tenements, hereditaments, and appurtenances thereunto belonging or in anywise appertaining, its heirs and assigns forever.

IN WITNESS WHEREOF said party of the first part, as trustee, has hereunto set his hand and seal on the day and year first above written.

In the presence of:

George P. Adcock
Robert C. Hampton

(SEAL)
George E. M. Gustafson
George E. M. Gustafson
Trustee for the townsite of Alakanuk
_____, State of Alaska

STATE OF ALASKA:

BE IT REMEMBERED, That on this 20th day of May, A.D. 1977, before me, a Notary Public, came George E. M. Gustafson, to me personally known to be the trustee of said townsite of Alakanuk, Alaska, and the identical person described in, and whose name is affixed to, the foregoing instrument of grant, and he acknowledged the execution of the same to be his voluntary act and deed as such trustee for the use and purposes therein mentioned.

MY TESTIMONY, I have hereunto subscribed my name and affixed my official seal, the day and year first above written.

Theresa J. Daniel
Theresa J. Daniel
Alaska, residing at Anchorage, Alaska

Notarially attested and signed on February 23, 1981

Wipac Printing Co.
Serial No. 100-1000

U.S. SURVEY No. 4405

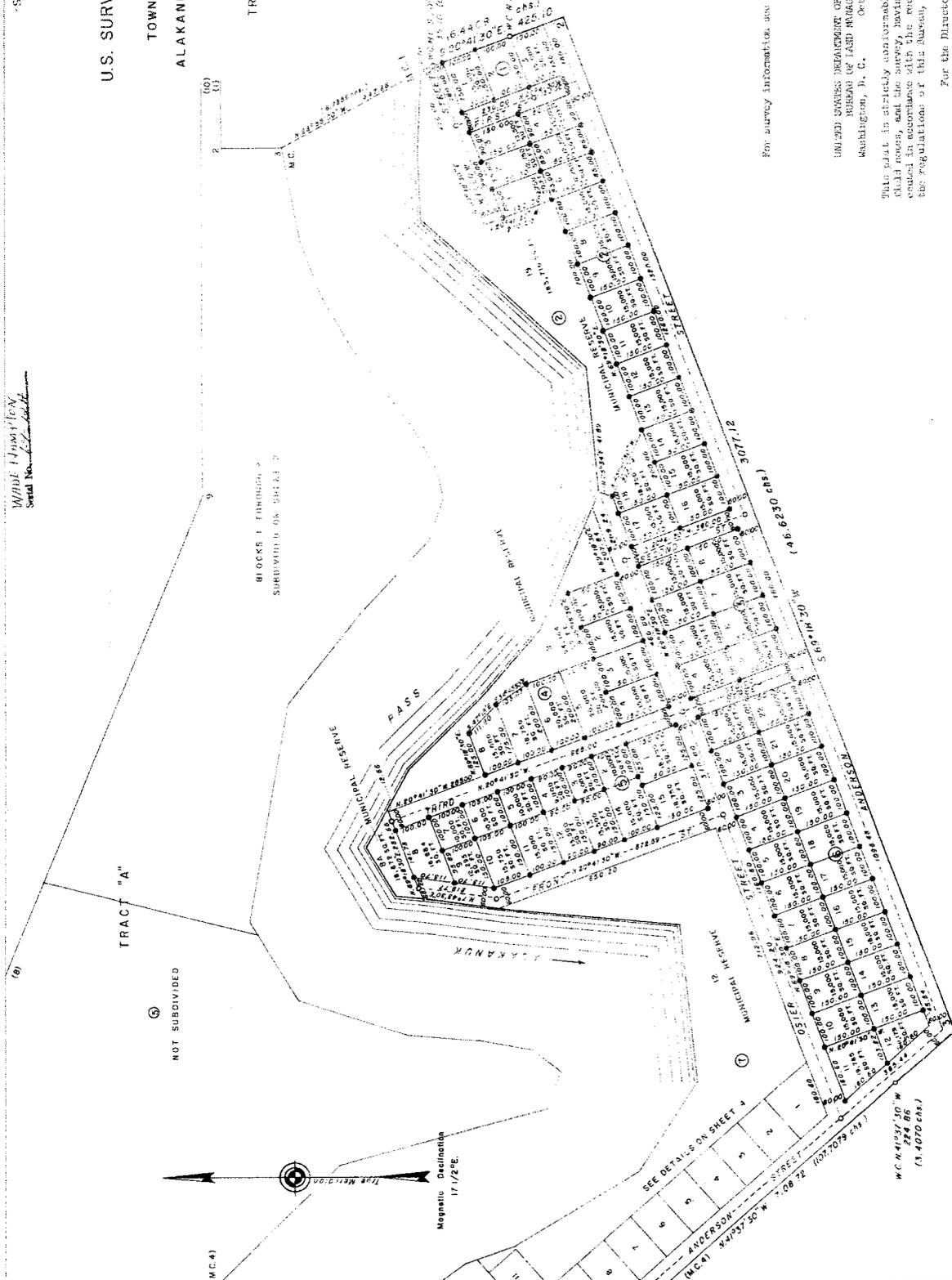
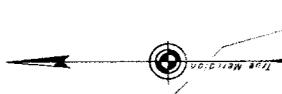
TOWNSITE OF
ALAKANUK, ALASKA

TRACT "B"

TRACT "A"

NOT SUBDIVIDED
(M.C. 4)

BLOCKS 1 THROUGH 9
SUBDIVIDED ON SHEET 2



For survey information see Sheet No. 1.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Washington, D. C. October 17, 1963

This plat is strictly conformable to the approved field notes, and the survey, having been correctly executed in accordance with the requirements of law and the regulations of this Bureau, is hereby accepted.

For the Director

R. E. Brown

Chief, Division of Engineering

- BRASS CAPPED IRON PILE
- COPPER WELDED MONUMENT
- IRON ROD WITH ALUMINUM CAP

