



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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Certified Mail, Return Receipt Requested
Article No.: 7015 1660 0000 0542 9930

May 6, 2016

Homer Electric Association
3977 Lake Street
Homer, AK 99603

Homer Electric Association
280 Airport Way
Kenai, AK 99611

Re: Homer Electric Association (HEA) – Kenai NWR Utility Poles
Hazard ID: 26551
Request for Site Characterization

Dear Mr. Bradley Janorschke and Mr. Bruce Linton:

This notification letter is to request that Homer Electric Association (HEA) conduct site characterization to determine the extent of pentachlorophenol (PCP), dioxin, and furan contamination associated with a subset of the treated wood utility poles located in the right-of-way along the Sterling Highway north of Sterling.

In late January of this year, the department was notified by the Kenai National Wildlife Refuge (NWR) that HEA was conducting maintenance work that involved removing and relocating some of the treated wooden power poles located on refuge land in a right-of-way issued to HEA. The US Fish and Wildlife Service (USFWS) was concerned over potential environmental impacts from preservatives used to treat the poles. USFWS staff collected and analyzed several soil samples from the base of twelve poles located in the project area and had them analyzed for pentachlorophenol (PCP), dioxins, furans and polynuclear aromatic hydrocarbons (PAHs). The laboratory results document concentrations of PCP, dioxins and furans significantly above the state soil cleanup levels. Insufficient data exist to determine the extent of contaminant migration, the potential risk that contaminants may pose, and whether environmental cleanup may be warranted or whether the contaminants may be managed in place.

As the owner of the poles, HEA is responsible for any contamination that may have resulted from their use.

In response to this information, I corresponded with HEA (Bruce Linton, Cody Neuendorf, and Bruce Alexander) and the Kenai NWR staff regarding the matter. We agreed that it would be best to cut-off the poles, above grade, that were slated for removal this winter rather than to remove them and disturb the surrounding

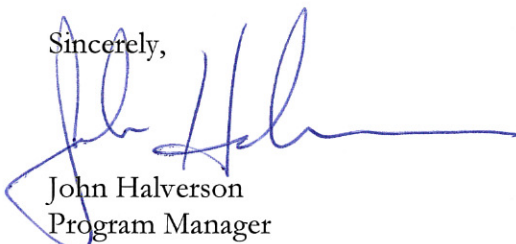
soil more than necessary. Decisions on the need for removal of the remainder of the poles and any contaminated media have yet be made. Additional site characterization is needed.

I understand that the Alaska Department of Transportation has a highway improvement project planned along the Sterling Highway later this year and that additional treated utility poles will need to be removed and relocated. It would be advantageous to all parties if HEA were able to conduct additional sampling and analysis before that project is implemented, as it may help in planning and managing any contaminated materials and may reduce the overall costs and efforts.

Therefore, the department requests HEA submit a sampling and analysis plan, by not later than June 22, 2016, to help delineate the extent of contaminant migration from poles that have been cut-off and those planned for relocation this year. Due to the unique issues involved, it is recommended that HEA and its environmental consultant confer with DEC and USFWS staff to discuss the data needs and work plan approach.

If you have questions about this letter and the site characterization needs, please feel free to contact me at 269-7545 or john.halverson@alaska.gov.

Sincerely,



John Halverson
Program Manager
ADEC Contaminated Sites Program

cc: Andy Loranger, Kenai NWR Manager
Lori Verbrugge, USFWS Contaminants Program