

**4/03/12  
PRESENTATION  
SULFOLANE AT  
THE NORTH  
POLE  
REFINERY**

<TARGET><BILL></BILL><SUBJECT>4-03-12 PRESENTATION  
SULFOLANE AT THE NORTH POLE  
REFINERY</SUBJECT><COMM>HHSS27</COMM></TARGET>

# Sulfolane at the North Pole Refinery



# What we'll be talking about...

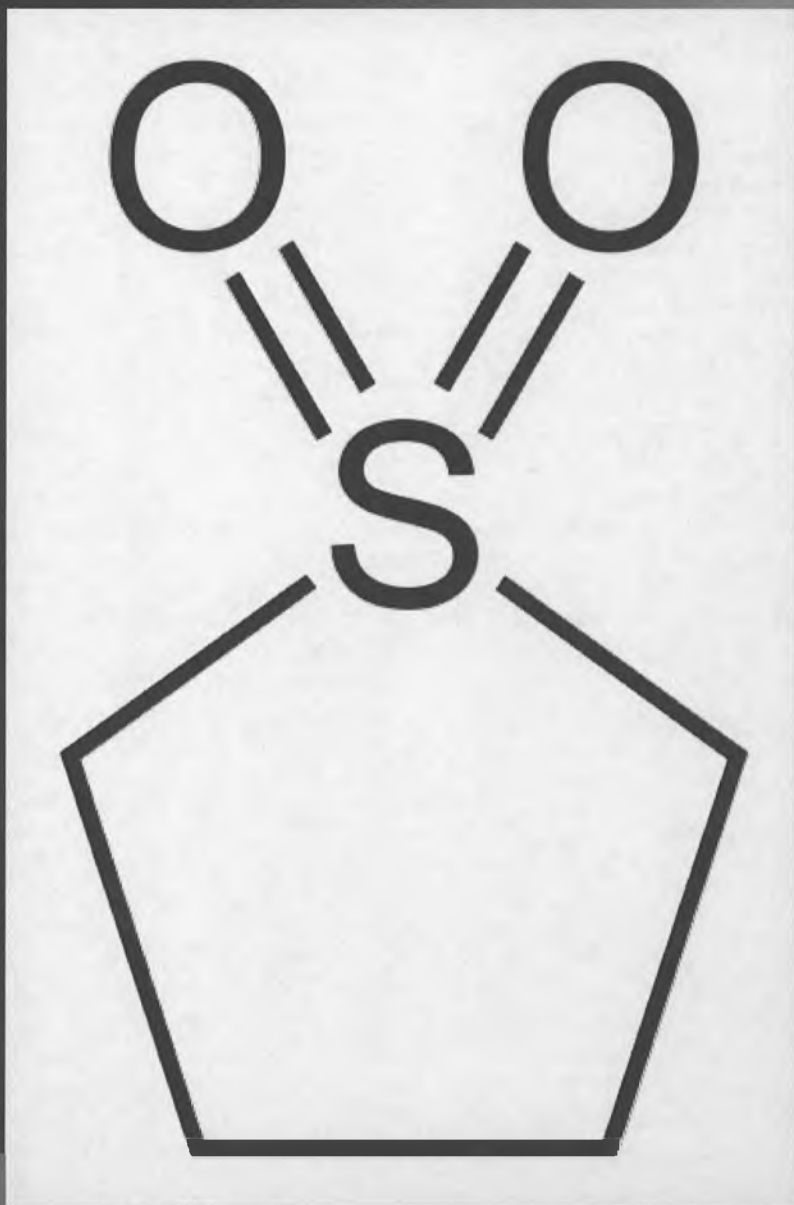


- Background
- Sulfolane Sources
- DEC Objectives
- ▶ Response Efforts
- ▶ Contaminant Research
- ▶ Next Steps
- ▶ Progress to date
- ▶ Questions

# Background

- ▶ Groundwater contamination resulting from spills
- ▶ Extensive plume threatens drinking water wells
- ▶ Sulfolane has no established standards for human consumption

# Sulfolane???



- ▶ Solvent used in the refining process to enhance the aromatic content of gasoline
- ▶ Also used in other industries as an industrial solvent

# Sources of Sulfolane and Current Plume





- |                                  |   |
|----------------------------------|---|
| ▲ Not Detected                   | ◆ Monitoring Wells                        |
| △ 3.2 µg/L - 10 µg/L (J-flagged) | --- Approximate Sulfolane Isoleth in µg/L |
| △ 10 µg/L - 25 µg/L              | ▭ FHRA Property Boundary                  |
| △ 25 µg/L - 100 µg/L             | 118 Sulfolane Concentration (µg/L)        |
| ▲ Greater than 100 µg/L          | J Estimated value                         |
|                                  | NS Not Sampled                            |



Notes:  
 Samples with duplicate data are represented by the greater of the two results.  
 Sulfolane was analyzed by EPA Method 1625B with isotope dilution.  
 Monitoring well data are from third quarter 2011.  
 Private well data from 2009-2011.

**DRAFT**  
 Figure 83  
**SULFOLANE CONCENTRATIONS  
 IN GROUNDWATER  
 10-55' BELOW THE WATER TABLE  
 FROM PRIVATE WELLS  
 North Pole Refinery  
 Flint Hills Resources Alaska, LLC**

# DEC Objectives

1. Protection of Public Health – prevent exposure
2. Source Control – stop new contamination
3. Cleanup – remove contamination on site
4. Toxicity research and investigation – evaluate long term risks, establish standards and monitor cleanup of the plume

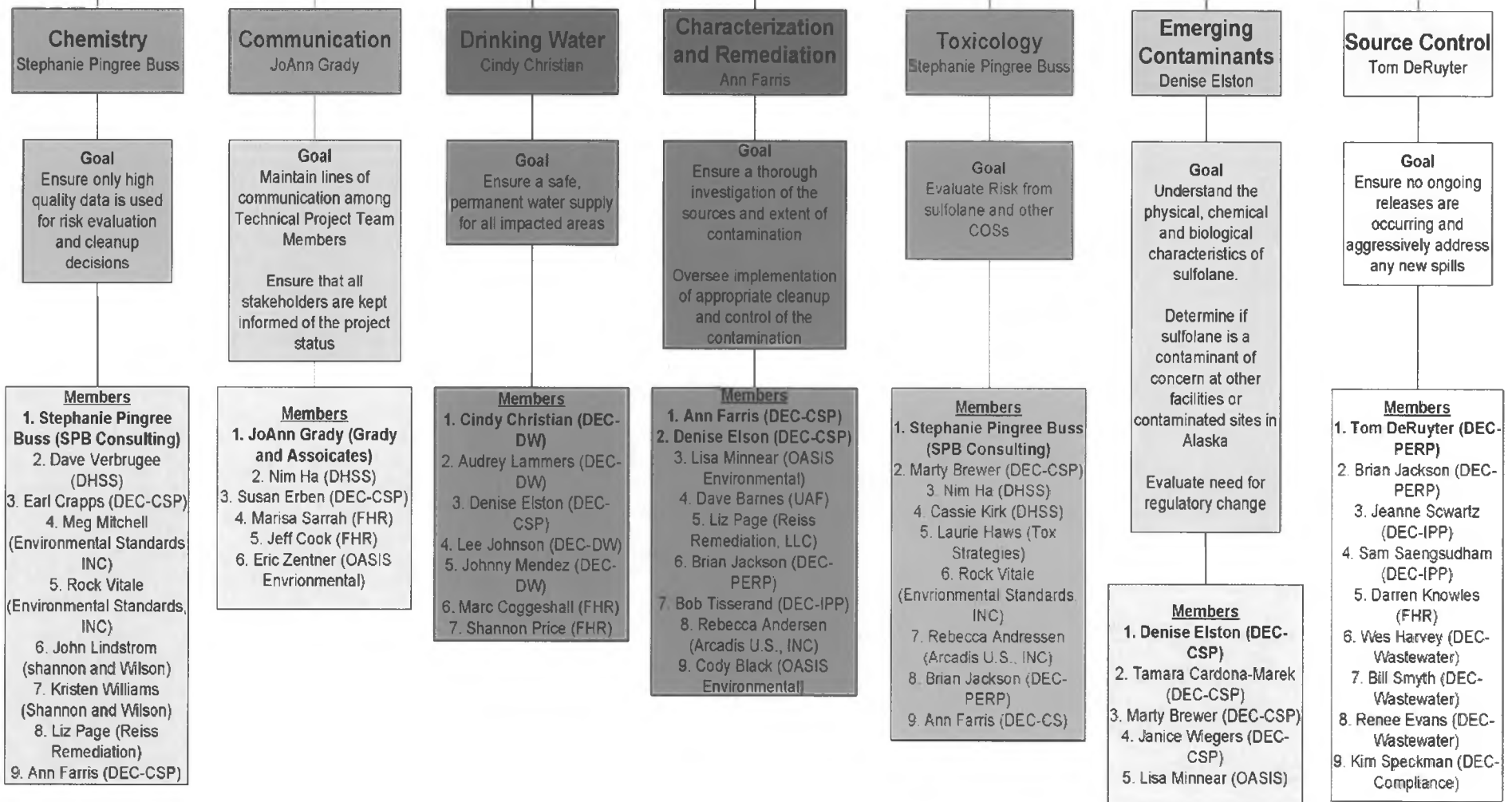
# DEC Immediate Actions in 2009

- ▶ Protection of public health – DEC and H&SS address human health impacts for contaminant of concern
- ▶ Alternative water – FHR immediately provides bottled water to affected well users
- ▶ Testing of individual wells and extent of contamination initiated
- ▶ DEC forms a technical project team of experts to deal with all aspects

# Who's Involved in Technical Team?

- ▶ **Liabile Parties**
  - Flint Hills (lead)
  - Williams (currently a silent member)
- ▶ **State Oversight**
  - Environmental Conservation (lead regulatory agency)
  - Health and Social Services
  - University of Alaska
- **Federal Oversight**
  - Agency for Disease and Toxic Substances
  - U.S. EPA
  - National Institute of Health (under Center for Disease Control (CDC))
- **Stakeholders**
  - Impacted well owners
  - State and Local Officials
  - Entire community

# Technical Project Team Subgroups



# Eliminate Exposure

- ▶ Evaluate alternative water supply and treatment options
- ▶ Develop an accurate and consistent analytical method for sulfolane in water, soil, and plants
- ▶ Evaluate risks from gardening and other water uses

# Identify and stop sources

- ▶ Verify facility integrity through inspection and testing of all underground facility components to prevent spills
- ▶ Comprehensive review of all historical spill records for contaminants of concern
- ▶ DEC has increased their inspection rate and conducted a simulated emergency response drill to test FHR's spill response capabilities.

# Aggressive Cleanup of Sources

- ▶ Cleanup measures implemented immediately.
  - Upgrade existing pump and treat system on site
  - Install a new pumping well to cover larger area of the refinery
- ▶ Research new options for treating sulfolane
- ▶ Remove contaminated soils and cleanup wastewater lagoon sources
- ▶ Install monitoring network for offsite migration

# Evaluate the toxicity of sulfolane

- ▶ State H&SS review of impacts and toxicity by medical experts
- ▶ Toxicity reviews by federal health agencies and US EPA
- ▶ Additional review by private sector technical experts
- ▶ Nominate sulfolane for additional toxicity research via the National Toxicity Program

# Determine Cleanup Level

- ▶ Initial level established by ATSDR in February 2010: 25 ppb
- ▶ ATSDR reevaluation and peer-reviewed recommendation in 2011: 20ppb
- ▶ US EPA provisional peer-reviewed number in February 2012: 10 to 20ppb
- ▶ ADEC currently asking Flint Hills to provide water to all those with a detection of sulfolane (>5 ppb)
- ▶ 3-Year Review of Cleanup Plan to incorporate new toxicity data

# Next Steps

- ▶ Site investigation, groundwater modeling, characterization and risk assessment completed by May with participation by UAF experts
- ▶ Treatability studies and pilot systems for alternative cleanup options completed this summer
- ▶ Complete Cleanup Plan by end of 2012
- ▶ Long-term monitoring and system performance evaluation for 3 years
- ▶ 3-yr review to review plan or change monitoring program as necessary

# Progress to Date

- ▶ Quick and serious State response in concert with federal health agencies and EPA as well as Flint Hills to stop exposure and ongoing leaks
- ▶ Safe alternative water provided for residents, restaurants, businesses and other users
- ▶ Robust process and oversight team to ensure an accelerated and thorough response from Flint Hills
- ▶ Supporting additional research through University of Alaska Fairbanks and National Toxicity Program to have science to make sound regulatory decisions

# Your Questions



# Sulfolane Investigation Update

January  
2012

*This update is provided by the Technical Project Team to inform the North Pole community of recent developments in the investigation and remediation of soil and groundwater contamination related to the North Pole refinery.*

## Sulfolane Nomination 'Strongly Supported' to the National Toxicology Program

The National Toxicology Program's Board of Scientific Counselors announced in December it strongly supports accepting sulfolane into its program in order to conduct additional research on the chemical's health effects.

Dr. Melissa McDiarmid, a board member and director of the Occupational Health Program at the University of Maryland's School of Medicine, said that sulfolane and the exposure to residents in the North Pole area "is precisely the situation that the NTP is supposed to serve."

The National Toxicology Program (NTP) is a federal interagency effort of the National Institutes of Health, Centers for Disease Control and Prevention, and Food and Drug Administration to safeguard public health by conducting cutting-edge toxicity research on new chemicals. The NTP's Board of Scientific Counselors is a federally chartered advisory committee whose members are university and industry experts appointed by the Secretary of the U.S. Department of Health and Human Services.

Now that the board has announced its endorsement, the sulfolane nomination must go to the NTP Executive Com-

mittee to be presented to the director for final approval. That will mark final acceptance into the program, opening the door for funding of the studies.

Dr. Scott Masten, director of the NTP's Office of Nomination and Selection,

"The board's conclusion confirms the community and the state's position that understanding the potential risk to public health from sulfolane is a priority on a national level, warranting additional high-quality toxicity research by the NTP."



*Ann Farris, DEC's project manager, is shown inspecting pumping operations. (DEC photo)*

said his office will move forward with designing specific studies.

"There are still a number of internal steps we go through before the project is formally approved. Over the next few months we will get a better handle on a timeline for beginning the studies and when we might be able to communicate results," Masten said.

Ann Farris, an environmental engineer with DEC's Contaminated Sites Program and coordinator of the project's Technical Project Team, said,

The sulfolane nomination has been successfully advanced to the federal funding process in part due to letters of support from Fairbanks North Star Borough Mayor Luke Hopkins, Alaska District F Sen. John Coghill, the Alaska Department of Health and Social Services, and others.

The Technical Project Team and its Toxicology Subgroup will continue to follow the nomination closely, interact with NTP scientists to provide information and accelerate the process whenever possible, and to communicate the status to the community.

**"I'm glad it looks optimistic that there will be more emphasis placed on the importance of identifying the unknowns, so people faced with this contamination will better understand what it means to them and their families."**

*— Rynniva Moss, chief-of-staff for Sen. John Coghill*

## UAF Groundwater Study

The University of Alaska Fairbanks (UAF) Institute of Northern Engineering and Institute of Arctic Biology have been selected by the Alaska Department of Environmental Conservation to conduct research on some of the factors that control the fate and transport of sulfolane in the groundwater underlying the Flint Hills Refinery and the adjacent North Pole area.

Internationally recognized experts in technical fields related to permafrost, cold regions contaminant hydrogeology, and cold regions microbiology are now involved in the project. These experts will help to develop a better understanding of the interaction of sulfolane with the subsurface conditions that are unique to the North Pole groundwater contamination.

One of the factors that will be investigated thoroughly is the biodegradation of sulfolane. Worldwide, only two similar studies have focused on the degradation of sulfolane in groundwater.

Specific topics the UAF researchers will work on:

- Characterization of the local lithology, hydrology and permafrost and how

these site-specific conditions influence plume migration.

- Interactions between groundwater and surface water and the resulting impact on plume migration.
- Biogeochemistry associated with the plume.
- Roles of sorption and biodegradation in plume development.
- Projection of plume movement.
- Chemical and microbial evidence of biodegradation in the plume.
- Identity of microbes from a plume active in sulfolane biodegradation.
- Effects of temperature and nutrient amendments on biodegradation.
- Potential for aerobic and anaerobic biodegradation in the plume.

“Understanding these complex soil and groundwater mechanisms will enable the DEC to implement the most effective plan for reducing the size of the sulfolane plume,” said Steve Bainbridge, manager of DEC’s Contaminated Sites Program.

DEC will continue to collaborate with Flint Hills through the Technical Project Team to develop site characterization and remediation plans for maximum protection of the health and welfare of North Pole residents.

## Update: Water Alternatives and Residential Sampling

Flint Hills Resources (FHR) and its contractors in 2011 continued to work toward providing an alternate water supply to those homes outside the City of North Pole limits with wells impacted by sulfolane.

To date, 230 solutions – a choice between a water treatment system, a bulk water tank or long-term bottled water delivery services – have been installed at residential and commercial locations in the area.

Outdoor work came to a close in October once temperatures started to prohibit the work flow, however, indoor work continues for those residents choosing the indoor treatment system.

Roughly 54 residents are still in the process of making a decision on which long-term solution they would like for their home, making a total of 284 affect-

ed homes. Those residents have been provided bottled water delivery service until their long-term solution is installed.

About 250 additional residences located in or near the plume area with non-detection results have also been provided bottled water delivery service.

Residential well testing efforts have continued by Shannon & Wilson, a geotechnical and environmental consultant contracted by FHR. Shannon & Wilson is currently in the seventh phase\* of residential testing and has completed roughly 85 tests in that area. One residential well had a positive detection for sulfolane, while the other 84 had non-detect results.

Monitoring wells have been established throughout the area over the course of this project. In 2011, FHR added 55 monitoring wells to the project. Monitor-

## Schedule Update

The Alaska Department of Environmental Conservation is maintaining an accelerated schedule for cleanup activities at the Flint Hills refinery site in North Pole. The aggressive schedule reflects the DEC’s view that understanding and cleaning up the contamination as quickly as possible is one of its highest priorities.

Recent activities:

- The Alaska Department of Health and Social Services’ Health Consultation has been completed.
- DEC continues to oversee Flint Hills Resources’ installation of alternative-water options in homes.
- DEC is reviewing the site characterization report that Flint Hills Resources submitted in December.

Upcoming project milestones:

- Sulfolane nomination awaits final clearance.
- Risk assessment will be finalized.
- Bench and pilot-scale tests of treatment alternatives will continue.
- A feasibility study will be prepared.
- Remedial alternatives will be selected.
- DEC will issue its final approval to operate the new city drinking water wells.

ing wells get sampled on a quarterly basis and the results from these tests will help determine the future of this project and answer questions about how the sulfolane plume is behaving.

FHR’s Groundwater Office, which is in North Pole’s Polar Plaza, just right of the post office, has been open for a little over a year now and will remain open as a source of information to the community and residents who have been impacted. Normal office hours are Monday through Friday, 8 a.m. to 5 p.m. People may also make an appointment by calling (907) 488-0723.

*\*In a given phase, Flint Hills samples drinking water wells downgradient from the presumed leading edge of the plume. If sulfolane is detected, drinking water wells farther downgradient are sampled in a subsequent phase.*

## DHSS Health Consultation

The Alaska Department of Health and Social Services (DHSS) has completed a "health consultation" reviewing potential ways North Pole residents may come in contact with sulfolane from private well water and the potential impacts from those exposures.

DHSS is tasked with evaluating the possible hazards to human health associated with toxic substances in the environment. The department responded to a request from the Alaska Department of Environmental Conservation to evaluate the public health risks of consuming and using private well water contaminated with sulfolane for household purposes.

DHSS reached six important conclusions in its health consultation:

1. North Pole residents who consumed water with detectable levels of sulfolane from their private wells are not likely to experience negative health effects.
2. Using water containing sulfolane from North Pole private wells for most household activities will not harm people's health. Based on currently available information, using well water to shower does not pose a health risk for North Pole residents; although, inhaling sulfolane in water droplets during showering needs further evaluation.

3. Eating sampled parts of edible plants (fruits and vegetables) that were tested for sulfolane uptake from seven North Pole gardens is not expected to harm people's health.
4. Sulfolane exposure from incidental ingestion of soil (such as accidentally eating small amounts of soil) or pica behavior (intentionally eating soil) is not expected to harm people's health.
5. There is no increase in cancer rates for North Pole residences compared to the entire state from 1996 to 2007 (when records were available).
6. There is no association between living in North Pole and an increased prevalence of birth defects from 1996 to 2009 (when records were available).

DHSS also made the following recommendations in its health consultation:

- North Pole residents with detectable levels of sulfolane in their well water should continue to use an alternative source of water for drinking and eating. This also applies to pets and other household animals.
- Flint Hills should continue to ensure that North Pole residents with detectable levels of sulfolane in their well water have a long-term

**"Although levels of sulfolane in people's wells are substantially lower than those that caused subtle health effects in test animals, we cannot say with absolute certainty that there will not be any health effects from long-term exposure to low levels of sulfolane in drinking water because no studies have looked at this in animals or people."**

*– Nim Ha, acting program manager of DHSS' Environmental Public Health Program*

alternative water source for drinking and cooking purposes.

- North Pole gardeners should use a water source that has no detectable level of sulfolane for growing edible plants, until more is known on the uptake of sulfolane into fruits and vegetables.

DHSS's top priority is to ensure that North Pole residents have sufficient information to safeguard their health. The department continues to be an active member of DEC's Technical Project Team and is committed to evaluate any new data that emerges on sulfolane that could impact public health.

DHSS will also continue to assist with ongoing health education needs for the North Pole community pertaining to sulfolane exposure, as resources allow.

## Development of Sulfolane Toxicity Values Advanced

Following extensive scientific peer review, draft toxicity values for sulfolane were advanced in November 2011 to the U.S. Environmental Protection Agency (EPA) in Washington, D.C., for final clearance.

Chemical toxicity values are instrumental to both the EPA Superfund Program and the Alaska Department of Environmental Conservation's Contaminated Sites Program. The values are necessary in conducting regulatory activities such as risk assessment and cleanup decisions.

Regulators first look to the EPA's Integrated Risk Information System (IRIS)

Program for scientifically established human health toxicity values. The program doesn't yet have a value for sulfolane.

In April 2011, the EPA developed a draft Provisional Peer-Reviewed Toxicity Value (PPRTV) for sulfolane. PPRTVs are developed after an evaluation of scientific information about the human health effects that may result from exposure to environmental contaminants.

The values are derived using the same rigorous methods, sources of data and agency guidance for values generally used by the EPA's IRIS Program. All provisional toxicity values receive

internal review by a panel of six EPA scientists and external peer review by three independently selected scientific experts.

The DEC Technical Project Team's Toxicology Subgroup will continue to work proactively with the EPA during its rigorous scientific evaluation of the potential human health effects from exposure to sulfolane.

The EPA's review of the PPRTV value for sulfolane is expected to be complete the end of January 2012. When it is, the value will be released to the public and the DEC will use it in its risk assessment and cleanup decisions.

## TPT Subgroups' Status Report

### Chemistry - Recent activities:

- Completed development of methods to accurately detect sulfolane in water, soil and produce. DEC approved commercial laboratory standard operating procedures for those methods.
- Worked with private and state laboratories to develop a method to analyze sulfolane in petroleum-contaminated soil. That method was used in characterizing sulfolane levels on the refinery.
- Instigated a third-party evaluation of all sulfolane data to ensure the highest quality data is submitted to the state.

### Toxicology - Recent activities:

- DEC approved the risk assessment work plan, approving the methods to evaluate potential risks from exposure to chemicals on and off the refinery. The risk assessment report will be used to help guide cleanup levels at the site.
- Released results of the Alaska Department of Health and Social Services' health consultation, which reviewed potential ways North Pole may come in contact with sulfolane from private well water and the potential impacts from those exposures.
- Sulfolane received "strong support" from the National Toxicology Program's Board of Scientific Counselors. A detailed study plan will be developed for funding approval and implementation.

### Site Characterization and Remediation - Recent activities:

- The subgroup met four times in the last quarter of 2011 and conducted additional meetings with select members to discuss specific issues.
- Significant recent discussion items:
  - The evaluation of the impact of petroleum interference in sulfolane in soil analysis.

- Details of the current work plan.
- The proposal of additional pump, tracer and injection tests.
- Potential data gaps related to the evaluation of remedial alternatives.
- Detailed expectations for data presentation.
- Feedback on changes to the garden study.

### Site Remediation - Recent activities:

*(Note: The Remediation Subgroup has met in conjunction with the Site Characterization Subgroup. The Remediation Subgroup's activity will increase as the project transitions from site characterization to site remediation.)*

- Conducted two meetings focusing on technologies to be evaluated in the feasibility study and on the use of the Interstate Technology and Regulatory Council protocol to evaluate the practicability of product recovery.

### Drinking Water - Recent activities:

- The new public drinking water wells began operating in January 2011. The City of North Pole has requested that DEC issues its final operational approval. DEC's Drinking Water Program engineers are continuing their review of the engineering plans for the wells. DEC's final operational approval for the project is expected in the near future.
- The new drinking water wells have been sampled each month and no sulfolane has been detected in any sample. The sampling frequency for the new wells will be reduced to quarterly for 2012.
- The Church at North Pole, a federally regulated public water system in the plume area, elected to install the point-of-entry water treatment system being offered by Flint Hills. DEC's Drinking Water Program engineers have issued an approval to construct the treatment system; the program issued an interim approval to operate in November 2011.

## Sulfolane Survey Results

The risk communication subgroup of the Alaska Department of Environmental Conservation's Technical Project Team (TPT) conducted a community survey last quarter asking which areas of the project are of the most concern to stakeholders affected by the sulfolane release.

### SURVEY RESULTS

#### Topics of the most concern

- Information on what is known about the toxicity of sulfolane.
- How action levels are determined for sulfolane in drinking water to protect public health.
- How DEC determines cleanup levels for sulfolane.

#### Topics requested for future updates

- Long-term toxicity and health effects of sulfolane.
- Size of the sulfolane plume and remediation efforts.
- Schedule for cleanup.

The risk communication subgroup will continue to address the issues identified from the public survey and will convey project information to the community using multiple avenues of communication. Those include:

- Newsletters such as this one.
- Fact sheets on topics of concern.
- Community open houses and workshops.
- DEC's interactive sulfolane website with current plume maps and updates on recent progress on the project.
- TPT meeting summaries posted on the website.
- Radio interviews discussing key milestone events on the project

## Project Contacts

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Ann Farris, environmental engineer and Technical Project Team coordinator, (907) 451-2104, ann.farris@alaska.gov.

Alaska Department of Health and Social Services, Division of Public Health, Epidemiology Section:

Nim Ha, acting program manager, Environmental Public Health Program, (907) 269-8028, nim.ha@alaska.gov.

DEC, Division of Environmental Health, Drinking Water Program:

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# DEC's Technical Project Team Information Update on the Sulfolane Investigation

April 2011

*This newsletter will be produced periodically to keep the North Pole community informed on the most current technical information regarding the investigation and remediation of the soil and groundwater contamination related to the North Pole refinery.*



*An aerial view of Flint Hills Resources' North Pole refinery from the south. Photo courtesy of Flint Hills Resources.*

## Technical Project Team Members

**Dr. Dave Barnes:** University of Alaska Fairbanks, Civil and Environmental Engineering professor and department chair

**Bill Butler:** City of North Pole, director of City Services

**Cindy Christian:** Alaska Department of Environmental Conservation Drinking Water, compliance program manager

**Dennis Elliott:** Williams, director of Environmental Health and Safety

**Ann Farris:** DEC Contaminated Sites Program, environmental engineer and TPT coordinator

**Nim Ha:** Alaska Department of Health and Social Services, Epidemiology Section, acting Environmental Public Health Program manager

**Brian Jackson:** DEC Prevention and Emergency Response Program, environmental program specialist

**Lee Johnson:** DEC Drinking Water Program, environmental engineer

**Dr. Cassandra Kirk:** DHSS, Epidemiology Section, public health assessor

**Elizabeth Page:** Flint Hills Resources Alaska, project manager

**Brandon Perkins:** U.S. Environmental Protection Agency, Region 10 Superfund Program

**Jeanne Swartz:** DEC Industry Preparedness Program, environmental program specialist

*Plus more than 50 technical advisors and support personnel*

*The Alaska Department of Environmental Conservation's Contaminated Sites Program in March 2010 created a Technical Project Team to provide comprehensive and coordinated oversight for the investigation into the release of sulfolane at the Flint Hills refinery in North Pole. The team consists of experts in the fields of toxicology, engineering, hydrology, environmental chemistry and other relevant fields, and is working to ensure the protection of human health and the environment.*

## Progress to date in the sulfolane investigation and cleanup: The TPT at work

This first issue of the Alaska Department of Environmental Conservation's newsletter describes the work, accomplishments and next steps of the Technical Project Team (TPT) overseeing the investigation and cleanup of the refinery's contaminant releases.

The most important releases have been the historical releases of gasoline and sulfolane that have impacted North Pole residents downgradient of the refinery.

The TPT meets about every six weeks in Fairbanks. The team has met nine times since its formation in March 2010.

The TPT created specialized subgroups that meet more often to focus on specific ques-

tions having to do with sulfolane toxicology, site characterization and remediation, chemical analysis and data quality, drinking water treatment and communication. Some important TPT milestones so far:

**"The North Pole sulfolane issue is a top priority for DEC. The Technical Project Team members are well-qualified and are working hard to address the complexities of the situation."**

– DEC Commissioner Larry Hartig, addressing the Fairbanks North Star Borough's Economic Development Commission on Dec. 14.

- The federal Agency for Toxic Substances and Disease Registry (ATSDR) developed a protective set of action levels for sulfolane in drinking water.

*Continued on Page 8*

# TPT Site Characterization and Remediation Subgroup Update

**Goals: To ensure a thorough investigation of the sources and extent of contamination, and to oversee the control and cleanup of the contamination.**

The Site Characterization and Remediation Subgroup is responsible for evaluating the current extent of contamination, migration or breakdown of that contamination, and technically feasible options for the appropriate control and cleanup of the contamination.

on the refinery until a final cleanup plan can be determined. The TPT is continuing to oversee the implementation of the plan. Roughly 1,800 gallons of fuel were collected by the upgraded remediation system in 2010. An evaluation of the system's performance is underway.

- The subgroup is conducting a statistical evaluation on the groundwater data as the data come in, to determine if the plume is moving or growing. To date, the data suggest the plume is not growing, but investigation and evaluation must continue to be certain.

Specific site characterization activities completed in 2010:

- Researched sulfolane's physical, chemical and biological characteristics.
- Completed rigorous inspections of the refinery for potential ongoing sources.
- Worked with Flint Hills Resources' technical and legal staff to develop a site characterization work plan -- essentially a road map required by regulation -- to fully investigate the contamination, evaluate exposure and determine if there are feasible cleanup options beyond the existing pump and treat system on the refinery.
- Reviewed Flint Hills' interim cleanup plan to upgrade the existing remediation system



*The Technical Project Team's Ann Farris of DEC (middle) meets with Flint Hills' Mark Gregory (left) and Mike Brose at the refinery in early fall 2009. Gregory is now with the company's Wichita, Kan., office; Brose is vice president of Alaska operations. DEC photo*

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## TPT Chemistry Subgroup Update

**Goal: To ensure only high quality data are used for risk evaluation and cleanup.**

The Chemistry Subgroup has been responsible for developing methods to further enhance the ability to detect sulfolane in water, soil and produce consistently and accurately.

The subgroup has developed data quality standards for analyzing sulfolane in water, vegetables and fuel, and is working on standards for soil.

The subgroup is also developing consistent laboratory methods so all laboratories analyzing for sulfolane are using the same methods and the results are accurate and comparable. As part of this method development, previously used laboratory methods for analyzing sulfolane are also being reviewed.

Activities the subgroup completed in 2010:

*Continued on Page 8*

# TPT Drinking Water Subgroup Update

**Goal: To ensure an alternate permanent drinking water supply for all impacted areas.**

The Drinking Water Subgroup is responsible for making sure North Pole residents have a drinking water supply that meets state standards.

The subgroup is also responsible for evaluating potential in-home treatment systems for impacted well owners and for overseeing the City of North Pole public water system's routine testing.

Samples for the latter are sent to DEC's Environmental Health Laboratory in Anchorage for sulfolane analysis. Both the raw and treated water have been consistently below the 25 parts per billion sulfolane action level recommended by the federal Agency for Toxic Substances and Disease Registry.

Activities the subgroup completed in 2010:

- Approved the drilling and development of the City of North Pole's two new public drinking water system wells.
- Analyzed the data from the more than 400 private drinking water wells, commercial wells and the two municipal wells that have been tested to understand the extent of contamination and risk to human health. This work will continue as more samples are taken.
- The subgroup is actively reviewing Flint Hills' research and development of in-home treatment system

options. The current carbon filtration treatment system looks promising, and Flint Hills presented verification data from pilot-scale systems at the March 30 TPT meeting. DEC engineers are currently reviewing the verification data and the final configuration of the treatment system.

The Water Quality Association, a nonprofit international trade association, is also undergoing review of the system for an independent third-party verification. The association's review is a three-month process. The final DEC engineering review will take place when DEC receives the final Water Quality Association report.



*Shannon & Wilson Inc.'s Mark Lockwood collects a sample for the new City of North Pole distribution wells last October. Shannon & Wilson is a Flint Hills contractor. Photo courtesy of Shannon & Wilson.*

# A Timeline: Technical Project Team Activities

## October 2009

- ◆ Flint Hills discovers sulfolane in drinking water wells north of the refinery property.

## October 2009 to February 2010

### Interim actions taken:

- ◆ Flint Hills completes a comprehensive drinking-water well search and sampling effort.
- ◆ Bottled water is provided to those impacted.
- ◆ DEC and health agencies evaluate the human health risk from sulfolane, a previously unregulated chemical.
- ◆ Tests of City of North Pole municipal wells are conducted weekly.

## February 2010

- ◆ The federal Agency for Toxic Substances and Disease Registry publishes its health consultation recommending a public health action level of 25 parts per billion in drinking water.
- ◆ DEC adopts that recommendation as an interim cleanup level for the site, requiring Flint Hills to complete a full site investigation on and off the refinery, as well as revise its corrective action plan to include sulfolane.

## March 2010

- ◆ DEC forms the Technical Project Team (TPT).
- ◆ Flint Hills submits its Draft Site Characterization Work Plan.

## April 2010

- ◆ The TPT holds its first meeting April 15. Subgroups and objectives are defined for each technical aspect of the project.
- ◆ The TPT reviews and provides comprehensive comments on the Site Characterization Work Plan.
- ◆ DEC requires an interim plan for remediation system upgrades from Flint Hills.
- ◆ DEC briefs North Pole and Fairbanks area legislators and the City of North Pole.
- ◆ The scope of the garden sampling project is defined.
- ◆ Flint Hills chooses to install new City of North Pole wells that don't have a capture zone that includes the refinery, despite concentrations of sulfolane being consistently below 10 parts per billion. DEC reviews the engineering plans for the new wells.
- ◆ Procedures are established for DEC to receive all data on a continuous, as collected, electronic basis to place into a mapping system that allows for better oversight of the investigation.

## May 2010

- ◆ The TPT meets May 5.
- ◆ The TPT holds an open house May 6 at the North Pole Plaza Mall.
- ◆ The Toxicology Subgroup reviews the objectives and methodology of a garden sampling project.
- ◆ The TPT establishes all possible routes for humans to come in contact with sulfolane through a conceptual site model, to verify that the upcoming summer's sampling will address those pathways. The Site Characterization Work Plan is modified accordingly.
- ◆ The TPT reviews Flint Hills' Sampling and Analysis Plan that describes how all environmental samples will be collected and analyzed on site. The Sampling and Analysis Plan is critical because sulfolane doesn't have a standard methodology.

- ◆ The TPT begins its in-depth review of the groundwater fate and transport model. The review involves research into the way sulfolane breaks down in the cold, low-oxygen subsurface environment beneath North Pole.
- ◆ DEC briefs North Pole and Fairbanks area legislators and mayors.

#### June 2010

- ◆ The TPT meets June 16.
- ◆ The U.S. Environmental Protection Agency receives a request to complete a preliminary assessment and hazard ranking of the refinery under the Comprehensive Environmental Response, Compensation and Liability Act (Superfund). The EPA begins an evaluation of the value of doing a preliminary assessment on a site already being actively investigated under the oversight of the TPT, which the EPA is already a part of, and involving a chemical without a federal cleanup level. To date, the EPA hasn't completed the preliminary assessment.
- ◆ DEC reviews Flint Hills' Spill Contingency Plan for weaknesses that can be addressed so future leaks and spills on the refinery property are avoided. Any issues found out of compliance are remedied.
- ◆ Flint Hills and its engineering contractor investigate historical leakage rates, estimated volume of spilled contaminants and potential chemicals of concern as part of the site characterization.
- ◆ DEC Drinking Water engineers review and approve the results of the City of North Pole water system wells, design specifications and engineering plan for the extension of city water to 27 residents (29 connections), primarily in the Ford subdivision, but also in the Highway Park subdivision and on Andrea Drive. The connections begin immediately.
- ◆ Flint Hills provides updates and revisions to the TPT on the Site Characterization Work Plan as the field investigation continues. The TPT provides technical direction based on an ongoing review of data.
- ◆ The Toxicology Subgroup discusses the sampling, scheduling and analysis for the garden sampling project, as well as the scope and objectives for a greenhouse study.

#### July 2010

- ◆ The TPT meets July 14.
- ◆ Flint Hills submits its Revised Draft Final Site Characterization Work Plan to DEC based on the TPT's comments.
- ◆ The first round of the garden sampling project is completed. Sulfolane is detected in plants, but below health action levels.

#### August 2010

- ◆ The Alaska Department of Health and Social Services issues a press release and fact sheet on the early results of the garden sampling project.
- ◆ DEC gives preliminary approval to the Site Characterization Work Plan so field investigation can continue.
- ◆ A Flint Hills contractor on Aug. 5 begins installing the water transmission lines from the City of North Pole's water treatment plant to the city's new well site. Another Flint Hills contractor begins drilling the first of two wells Aug. 26 and concludes drilling the second on Oct. 21.

#### September 2010

- ◆ DEC briefs North Pole and Fairbanks area legislators and mayors.
- ◆ The TPT meets Sept. 14.
- ◆ The TPT establishes the Chemistry Subgroup to refine the methodology for analyzing for sulfolane in the water, soil and plants so the analysis is more precise.
- ◆ Flint Hills presents an overview of the in-home treatment system as an alternative source of water for impacted residents based on laboratory tests of the system. The TPT reviews the laboratory data and describes the additional data required to proof the technology.

#### October 2010

- ◆ The TPT holds an open house Oct. 5 at the North Pole Plaza Mall.

#### November 2010

- ◆ The TPT meets Nov. 3.
- ◆ DEC improves the North Pole sulfolane public interface Web site and communication resources.
- ◆ Flint Hills completes a ground-penetrating radar investigation to gather information on soil lithology and provides the results to the TPT.
- ◆ The TPT completes the final quality assurance validation of the June vegetable samples. The process is exhaustive, involving six chemistry experts and two toxicologists.
- ◆ Flint Hills submits to DEC a final report on the inspections of the refinery's sumps.
- ◆ DEC briefs the Fairbanks North Star Borough Mayor's Office.

#### December 2010

- ◆ The TPT meets Dec. 14.
- ◆ DEC meets with the Fairbanks North Star Borough's Economic Development Commission and Mayor's Office.
- ◆ Flint Hills and DEC continue to review the in-home treatment system and Flint Hills continues data collection to show the technology can be effective.
- ◆ The TPT defines the objectives and methodology of an adsorption study that's required to explain why carbon filtration is effective for sulfolane, despite previous research indicating that sulfolane doesn't adsorb to soil.

#### January 2011

- ◆ DEC meets with the EPA and ATSDR to discuss the process for developing a federal toxicity value for sulfolane.
- ◆ The final validation of all garden data is completed.
- ◆ DEC issues key criteria for the groundwater analysis of sulfolane. These criteria create specific uniform standards that all laboratories analyzing water for sulfolane must meet. This is the best methodology based on a review of the data collected during 2010. It's designed to reduce the variability in results between laboratories and increase confidence in all data.
- ◆ The Water Quality Association, a nonprofit international trade association that does laboratory product-testing, among other things, is brought in as an independent third party to verify the in-home treatment technology along with DEC's review. The Water Quality Association's review is a three-month process.
- ◆ Flint Hills begins discussing options with all homeowners impacted by sulfolane and offers settlement agreements.

#### February 2011

- ◆ The TPT meets Feb. 16.
- ◆ DEC briefs North Pole and Fairbanks area legislators.
- ◆ The TPT identifies the need for additional monitoring wells to investigate the extent of the contamination and to better understand the fate of sulfolane in the aquifer.
- ◆ The City of North Pole supplies residents with water from the two new wells beginning Feb. 14.

#### March 2011

- ◆ DEC issues key criteria for the soil analysis of sulfolane.
- ◆ The City of North Pole accepts ownership of the two new wells March 21.
- ◆ The TPT meets March 30.
- ◆ The redesign of DEC's sulfolane Web site is completed.

## TPT Toxicology Subgroup Update

**Goal: To evaluate the potential risk of adverse health effects caused from the exposure to contaminants from the North Pole refinery's history of spills.**

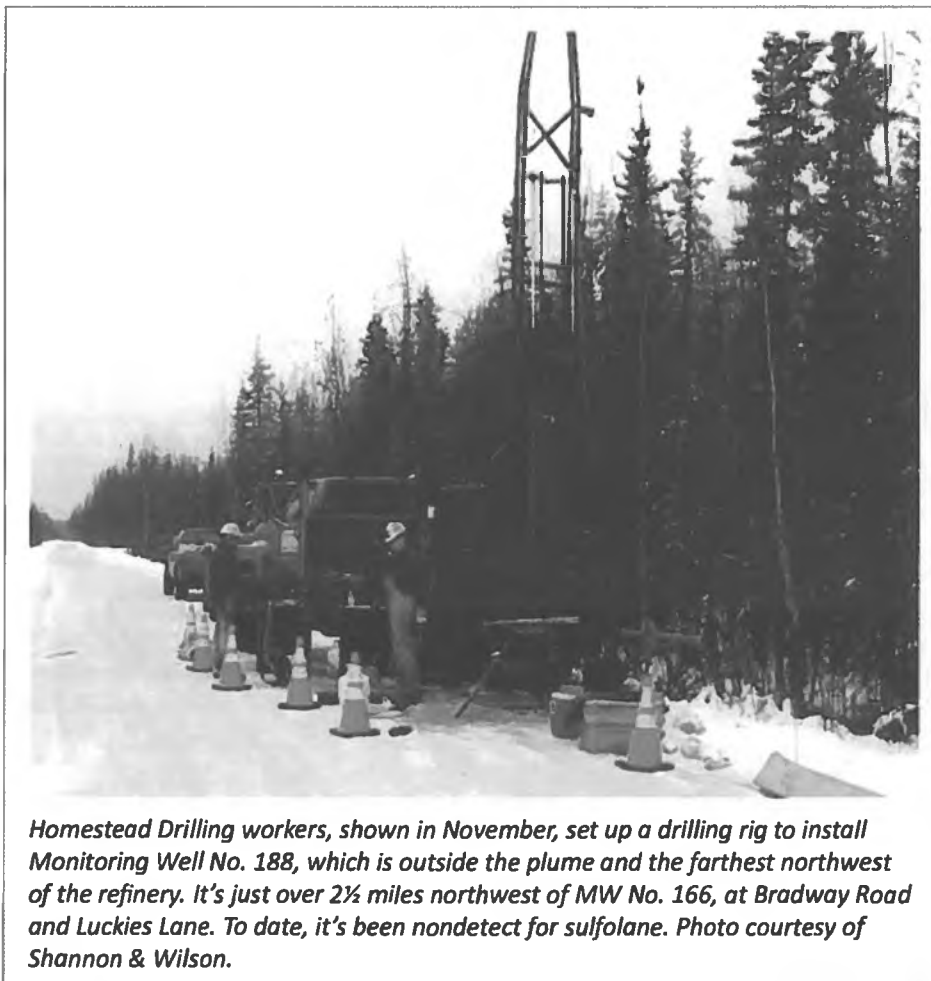
The Toxicology Subgroup is evaluating the toxicity and risk from exposure to sulfolane in drinking water and garden plants, and is identifying other ways people and animals may be exposed to sulfolane and other contaminants released to the environment at the North Pole refinery.

The subgroup's activities in 2010:

- Developed and conducted a garden sampling project to determine the amount of sulfolane present in fruits and vegetables grown with sulfolane-impacted well water in North Pole gardens. DEC and the Alaska Department of Health and Social Services released early results of the project in August; results of the full project were released in January.
- Continued work with the U.S. Environmental Protection Agency, federal Agency of Toxic Substances and Disease Registry, and University of Alaska Fairbanks to evaluate the toxicity of sulfolane and set regulatory levels.
- Continued work with the federal and state agencies to determine the need for and the scope of a toxicity study that would evaluate the effects from long-term exposure to sulfolane.

- Identified the need for additional plant uptake studies to identify the method for which plants take in sulfolane from groundwater. That information could be used to estimate the amount of

sulfolane in garden fruits and vegetables that haven't been sampled and to estimate sulfolane concentrations in fruits and vegetables grown in future growing seasons.



*Homestead Drilling workers, shown in November, set up a drilling rig to install Monitoring Well No. 188, which is outside the plume and the farthest northwest of the refinery. It's just over 2½ miles northwest of MW No. 166, at Bradway Road and Luckies Lane. To date, it's been nondetect for sulfolane. Photo courtesy of Shannon & Wilson.*

## TPT Communication Subgroup Update

**Goals: To maintain lines of communication among TPT members and to ensure all stakeholders are informed on the project status.**

The initial DEC Emergency Response Communication Plan was put in place at the outset of this project, in October 2009.

A year later, the Communication Subgroup expanded the DEC Communication Plan to facilitate a sustainable, interactive plan that both ascertains the concerns of the public and addresses the public's informational needs.

The subgroup has worked collaboratively with all involved state and federal agencies, and all other project stakeholders.

A synopsis of the subgroup's activities in 2010 that will continue in 2011:

- Maintained a sulfolane Web site ([dec.alaska.gov/spar/csp/sites/north-pole-refinery](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery)) to provide as

much up-to-date information as possible to the public.

- Held community open houses and community workshops to answer community questions in person.
- Sent out updates on the sulfolane investigation, summaries of the TPT meetings and other information to

*Continued on Page 8*

## Progress to date

### From Page 1

- When sulfolane was discovered in the groundwater off the refinery property, Flint Hills immediately interrupted exposure to sulfolane through drinking water by distributing bottled water to residents in the impacted area.
- A DEC contractor, the Alaska Department of Health and Social Services, and Flint Hills in early 2010 completed a comprehensive search of all literature and case studies related to sulfolane. They found unpublished material that was previously unavailable and had Chinese studies of the toxicity of sulfolane translated.
- DEC and DHSS, with input from the TPT and field sampling by contractor Shannon & Wilson, completed a garden sampling project involving seven local gardeners. DHSS issued a fact sheet with the final results in January.
- Seventy-eight delineation wells have been installed and more than 400 private wells sampled to understand the extent of the sulfolane groundwater plume. The horizontal extent is now well understood. More wells are now being drilled to fully

understand the vertical extent of the contamination. Up-to-date maps of the plume can be found on DEC's North Pole sulfolane Web site.

- Trends in the groundwater data on and off the refinery indicate a stable or decreasing plume, but additional wells must be installed and monitoring must continue to be certain we completely understand the fate of sulfolane in the aquifer.
- Inspections of the infrastructure on the refinery indicated six areas of potential leaks. Those are being addressed and the inspection frequency has been increased. Additionally, DEC's Prevention and Emergency Response Program now conducts a site inspection every time there's a spill on the refinery, even if it's to an enclosed containment area, to ensure handling processes are improved.
- The design and construction of the two new municipal wells have been completed and they went online Feb. 14.
- The TPT has also developed a standard procedure for analyzing sulfolane in water to increase the comparability of results from different Alaska laboratories and to lower the detection limit in water from

10 parts per billion to 5. Because the U.S. Environmental Protection Agency doesn't regulate sulfolane, there was no set of standard operating procedures that all laboratories had to follow.

Therefore, although all the laboratories used the widely accepted EPA8270 method for analysis, there were minor variations in their use of surrogates and quantification techniques that led to variability in results from different laboratories. This variability will be minimized with the new procedures.

- An in-home water treatment system has been developed and is undergoing accelerated pilot-testing. Flint Hills is offering this treatment option to homeowners who wish to continue to use their wells. Other options that Flint Hills is offering are bottled water, bulk-water tanks, and holding tanks for water for gardening.
- New treatment equipment and a new pumping well have been installed at the refinery to more aggressively clean up the source area.
- A robust and interactive communication plan has been developed to provide the most current information to all stakeholders.

## Chemistry

### From Page 2

- Developed a laboratory method to accurately assess the amount of sulfolane in fruits and vegetables as part of the garden sampling project.
- Reviewed all garden sampling project laboratory data to ensure all results were accurate and identified any necessary adjustments to the laboratory methods for analyzing sulfolane in garden produce.
- Identified all necessary quality control measures to ensure laboratories analyzing for sulfolane are

doing so accurately and consistently between laboratories.

- Adjusted current water laboratory methods to develop a statewide standard method to accurately identify the amount of sulfolane in water samples.
- Determined standard requirements for all data submitted to the state and the public.
- The final laboratory data quality standards and DEC-approved laboratory standard operating procedures for analyzing for sulfolane are expected by the end of April.

## Communication

### From Page 7

sulfolane-impacted well owners, North Pole residents, public officials and others who signed up for a sulfolane mailing list. The information was also posted on the sulfolane Web site.

- Provided regular updates to state and local officials.

## The Next Steps

### Steps taken in February 2011:

- The two new City of North Pole drinking water wells were brought online Feb. 14 to serve as the municipal water source. They were installed outside the plume with a capture zone that doesn't include the refinery.
- DEC and the City of North Pole are continuing to work together sampling and analyzing the municipal water supply for sulfolane as well as for other regulated chemicals. The results will be available from DEC's Drinking Water Program and will be posted on DEC's sulfolane Web site.
- Flint Hills is contacting homeowners to discuss the options for permanent alternative water supplies and holding tanks for their gardens.

### March 2011:

- The TPT developed requirements for standard operating procedures for laboratories analyzing sulfolane in water or soil at the Flint Hills site. Individual laboratory procedures will be reviewed by the TPT to ensure accurate analysis. Additional water and soil sampling will be conducted in 2011.
- The TPT Toxicity Subgroup met with and will continue to meet with the U.S. Environmental Protection Agency and the federal Agency for Toxic Substances and Disease Registry to monitor the status of setting a federal action level for sulfolane and the release of a nationally peer-reviewed health consultation.

### This month:

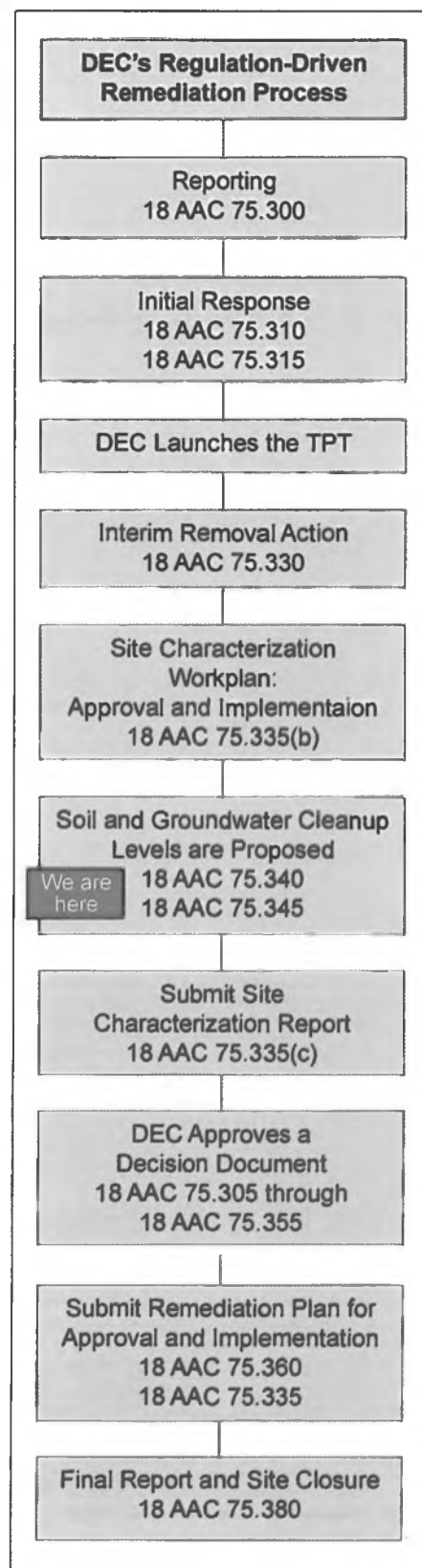
- Flint Hills and the TPT are working on the full characterization of the vertical delineation of the sulfolane plume – essentially, the determination of how deep the plume is by drilling more monitoring wells. The

full characterization is expected to be completed by the end of summer.

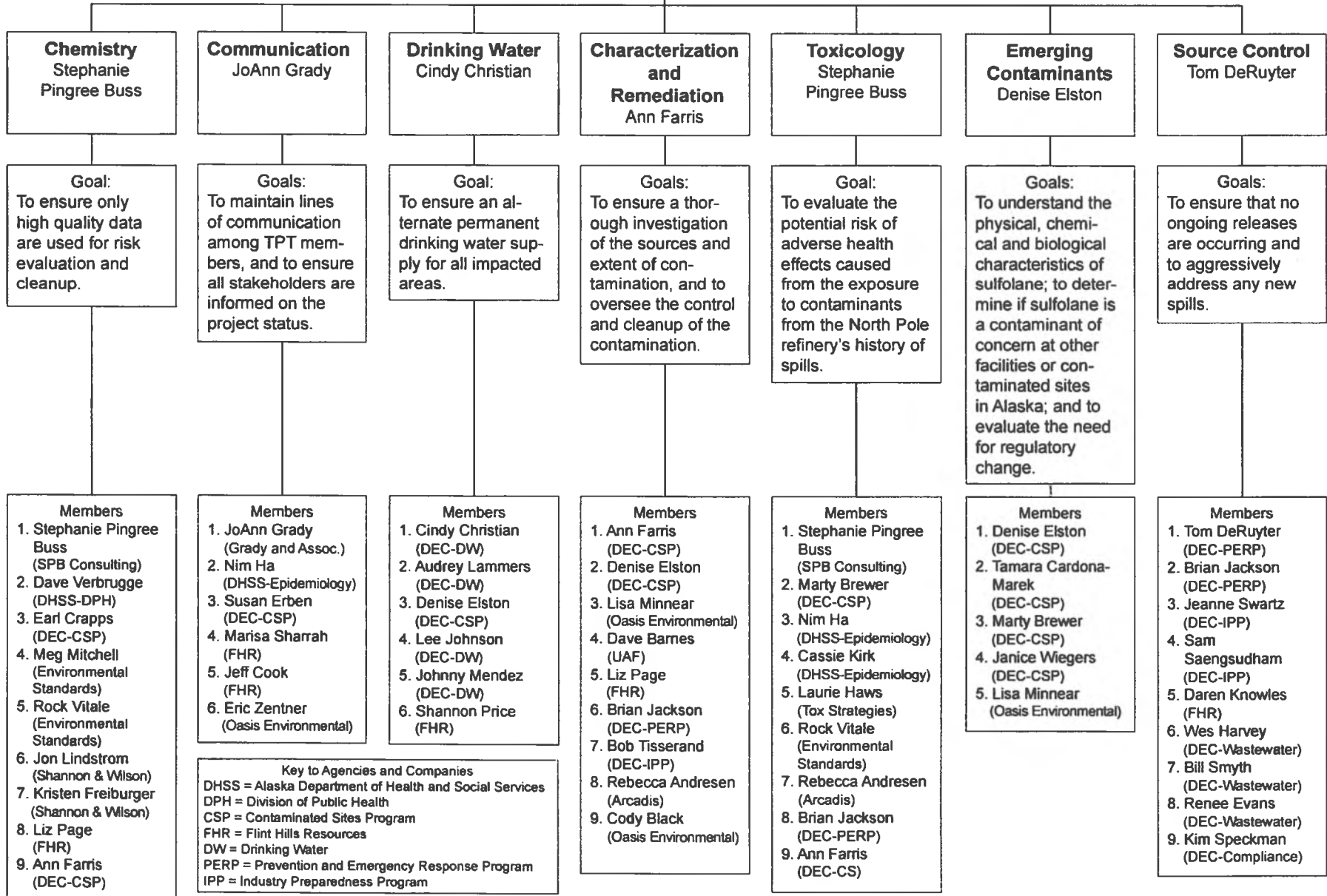
- The TPT Site Characterization Subgroup will meet to discuss the numerical fate and transport modeling to determine the status of Flint Hills' efforts on understanding the historical movement of sulfolane from the refinery and the length of time to clean up the contamination.
- DEC and the TPT are continuing their engineering review of Flint Hills' proposed treatment system for individual drinking water wells; Flint Hills presented verification data from pilot-scale systems at the March 30 TPT meeting. The final DEC and TPT review will take place when DEC receives a final Water Quality Association report – an independent third-party verification that takes three months. The results of the reviews will be published on DEC's sulfolane Web site.

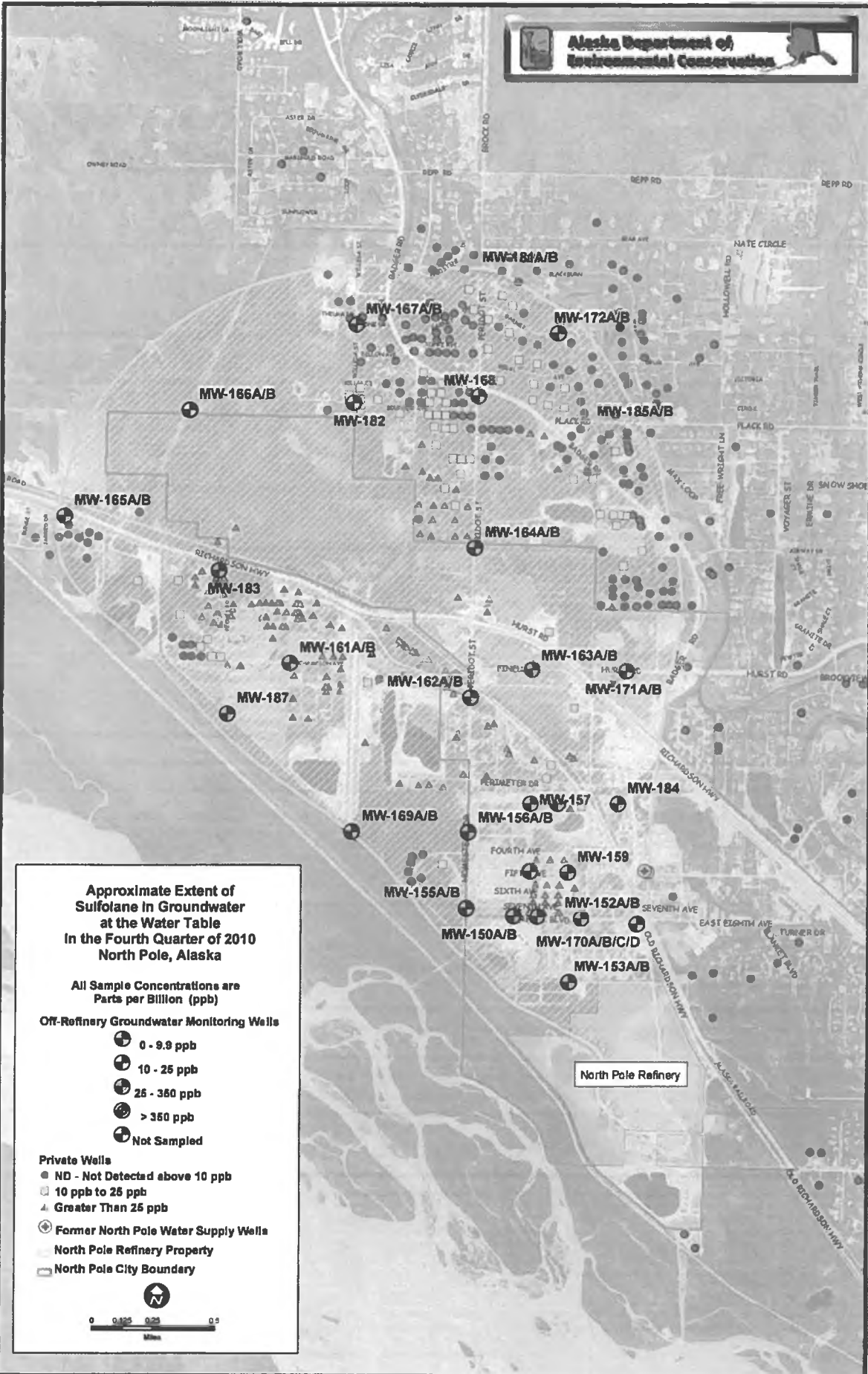
### May 2011:

- The TPT is holding a community workshop on sulfolane May 16 from 7 p.m. to 9 p.m. at The Grange in North Pole, Mile 3.5 Grange Road. The topics will include what we know and don't know about sulfolane, and a review of the Alaska Department of Health and Social Services health consultation that talks about the different ways people can be exposed to the solvent. TPT members will be available to answer questions. For more information, call the DEC's Susan Erben at (907) 465-5206.
- A TPT meeting will be held May 17.
- The Draft Site Characterization Report is due from Flint Hills by May 30. The report will summarize the data collected and work completed since late 2009 related to the sulfolane investigation and cleanup.



# Technical Project Team Subgroups





## Glossary

**Adsorption** – Removal of a pollutant from air or water by collecting the pollutant on the surface of a solid material; e.g., an advanced method of treating waste in which activated carbon removes organic matter from wastewater.<sup>1</sup>

**Attenuation** – The process by which a compound is reduced in concentration over time, through absorption, adsorption, degradation, dilution, and/or transformation. Can also be the decrease with distance of sight caused by attenuation of light by particulate pollution.<sup>1</sup>

**Aquifer** – An underground geologic formation composed of materials such as rock, sand, soil or gravel that can store and supply groundwater to wells and springs. Aquifers in Alaska can be as little as a few feet below ground surface to more than 200 feet below ground surface. A groundwater supply is usually considered an aquifer if it contains enough water to supply the water needs for a community. An unconfined aquifer is open to receive water from the surface, and whose water table surface is free to fluctuate up and down, depending on the recharge/discharge rate. There are no overlying “confining beds” of low permeability to physically isolate the groundwater system.<sup>2</sup>

**ATSDR** – The acronym stands for the Agency for Toxic Substances and Disease Registry, which is in the U.S. Department of Health and Human Services. It's a federal public health agency that evaluates the human health effects of exposure to hazardous substances. It's an independent operating division within DHHS, but the Centers for Disease Control (also within DHHS) performs many of its administrative functions. DEC's interim cleanup level for sulfolane at Flint Hills is 25 parts per billion, which is based on ATSDR's lowest recommended action level for sulfolane in drinking water.

**Bioremediation** – A technique that uses bacteria or other organisms to clean up contamination. Bacteria generally break down the contamination into less harmful components, such as carbon dioxide and water. Bioremediation can be used to clean up soil or water. Water and nutrients, such as fertilizer and oxygen, may be added to the contaminated



*The Flint Hills Resources refinery in North Pole at sunset. Photo courtesy of Flint Hills Resources.*

*Continued next page*

## **Glossary** *From Page 12*

soils to speed up the breakdown process. Some chemicals, such as gasoline, are easily bioremediated while others, such as pesticides, cannot be effectively treated using bioremediation. The contamination can be treated in place (in situ) or the material can be excavated and treated above ground in a different location (ex situ). Types of soil bioremediation methods include landfarming, composting, land spreading, biotreatment and biopiles. Types of water bioremediation include natural attenuation and engineered wetlands.<sup>2</sup>

**Carbon adsorption/carbon filtration** – A treatment system for contaminated water or air, where the contaminated media is forced through tanks containing activated carbon. Activated carbon attracts, or adsorbs, the contaminants. This treatment is usually combined with other forms of treatment such as air stripping or an oil/water separator. Spent carbon must be treated or properly disposed of.<sup>2</sup>

**Cleanup** – Efforts to mitigate environmental damages or threat to human health, safety or welfare from hazardous substances or oil. It may include removal of a hazardous substance from the environment, including restoration, remediation and other measures that are necessary to mitigate or avoid further threat to public health, safety and welfare, or the environment. Cleanup is often used interchangeably with terms such as corrective action, remedial action, removal action or response action. It is often used broadly to describe various actions or phases of an action, such as the remedial investigation/feasibility study in the Superfund process.<sup>2</sup>

**Conceptual Site Model** – A summary of conditions at a site that identifies the type and location of all potential sources of contamination and how and where people, plants or animals may be exposed to the contamination.<sup>2</sup>

**Exposure pathway** – An exposure pathway refers to the way in which a person (or plants or animals) may come into contact with a hazardous substance. An exposure pathway has five parts: a source of contamination (such as an abandoned business); an environmental media and transport mechanism (such as movement through groundwater); a point of exposure (such as a private well); a route of exposure (eating, drinking, breathing or touching); and a receptor population (people, or plants or animals, potentially or actually exposed). When all five parts are present, the exposure pathway is termed a completed exposure pathway.<sup>3</sup>

**Groundwater** – Water found beneath the earth's surface that fills pores between sand, soil particles or gravel creating a saturated zone. In aquifers, groundwater is in sufficient quantities that it can be used for drinking water, irrigation or other purposes.<sup>2</sup>

**Hazard Ranking System** – The principal screening tool used by EPA to evaluate risks to public health and the environment associated with abandoned or uncontrolled hazardous waste sites. The HRS calculates a score based on the potential of hazardous substances spreading from the site through the air, surface water or groundwater, and on other factors such as density and proximity of human population. This score is the primary factor in deciding if the site should be on the National Priorities List and, if so, what ranking it should have compared to other sites on the list.<sup>1</sup>

**Health consultation** – A review of available information or collection of new data to respond to a specific health question or request for information about a potential environmental hazard. Health consultations are focused on a specific exposure issue. Health consultations are therefore more limited than a public health assessment, which reviews the exposure potential of each pathway and chemical.<sup>3</sup>

**Interim Remedial Action** – An interim measure to remove or isolate contamination. This action can be taken any time during the process and is usually taken to protect people and the environment from high levels of contamination until the final remedial action can be taken.<sup>2</sup>

**Monitoring wells** – Wells drilled at specific locations where groundwater parameters (depth, flow direction, chemical nature and so forth) can be sampled to determine the types and amounts of contaminants present.<sup>2</sup>

**Natural attenuation, or intrinsic remediation** – The natural breakdown of hazardous substances in the environment. Many hazardous substances will slowly degrade or break down into non-hazardous substances through natural processes in the environment. Natural attenuation may be approved as a remedy for contamination, particularly if other efforts have been exhausted without achieving the applicable cleanup levels, and as long as there is little

*Continued next page*

## Glossary *From Page 13*

chance that the contamination will pose a threat to people, plants or animals. Regular monitoring of soil and groundwater may be required to ensure that natural attenuation is occurring.<sup>2</sup>

**Parts per billion** – For both soil and water, one part per billion (ppb) is when a microgram, or 1/1,000,000<sup>th</sup> of a gram, of a contaminant is present in one liter of water or one kilogram of soil. Here are some analogies to visualize one part per billion: One part per billion is one drop of water in an Olympic-size swimming pool, which holds about 130,000 gallons. One part per billion is 1/32 of a second of one year. One part per billion is one minute of 1,903 years. (For more information, see the DEC fact sheet entitled, *Contaminant Concentrations*, at [dec.alaska.gov/spar/csp/guidance/cont\\_concentrations.pdf](http://dec.alaska.gov/spar/csp/guidance/cont_concentrations.pdf).)

**Plume** – A visible or measurable discharge or release of a contaminant as it moves water or air from a given point of origin. The plume of a contaminant in groundwater is the area of water which, as it moves underground, carries the contaminant with it. The shape is often like that of a skinny balloon. The portions of the plume close to the source will have higher concentrations than the portions farther away from the source. Natural physical, chemical and biological processes diminish the concentration levels as the water carries the contaminant away from the source.<sup>2</sup>

**Public health assessment** – An ATSDR document that examines hazardous substances, health outcomes and community concerns at a hazardous waste site to determine whether people could be harmed from coming into contact with those substances. The public health assessment also lists actions that need to be taken to protect public health.<sup>3</sup>

**Stakeholder** – A person, group or community who has an interest in activities at a hazardous waste site.<sup>2</sup>

**Toxicology** – The study of the harmful effects of substances on humans or animals.<sup>2</sup>

**Work plan** – A written plan that describes the planned actions, such as sampling and analysis, site investigation, site assessment or risk assessment. It includes the justification and instructions for conducting these activities. It also includes health and safety plans for the workers conducting these tasks.<sup>2</sup>

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<sup>1</sup> From the U.S. Environmental Protection Agency's Terms of Environment: Glossary, Abbreviations and Acronyms at [www.epa.gov/OCEPATERMS/](http://www.epa.gov/OCEPATERMS/).

<sup>2</sup> From the Alaska Department of Environmental Conservation's Spill Prevention and Response Division Glossary of Terms and Acronyms at [dec.alaska.gov/spar/glossary.htm](http://dec.alaska.gov/spar/glossary.htm).

<sup>3</sup> From the Agency for Toxic Substances and Disease Registry's Glossary of Terms at <http://www.atsdr.cdc.gov/glossary.html>.

The following is an executive summary for a report that Oasis Environmental, an environmental consulting firm, did under contract for the Technical Project Team. The Alaska Department of Environmental Conservation posted the full report, along with this executive summary, in September on the department's North Pole sulfolane Web site at [dec.alaska.gov/spar/csp/sites/north-pole-refinery/](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/). Because this executive summary has a lot of good background information on sulfolane and readers might have missed it, we've reprinted it here.

## **Sulfolane Technical Assistance and Evaluation Report**

### **Executive Summary**

This report summarizes research of sulfolane's physical and chemical properties, industrial applications, corrosivity, breakdown and attenuation processes, and case histories involving sulfolane spills. The information included in this report is intended for readers to better understand how sulfolane is used in the oil and gas industry, its potential to cause corrosion in process equipment and piping, sulfolane regulations, and case histories of sulfolane spills and any cleanup that was completed.

Sulfolane is an organic compound that is readily soluble in water; it prefers to dissolve in water rather than stay in its pure form or attach to soil particles. It is also soluble, although to a lesser extent, in hydrocarbons (components of fuel). In its pure form, sulfolane is a clear, colorless liquid that is heavier than water. It does not readily evaporate like other solvents do, such as paint thinners or benzene.

The high solubility of sulfolane in water means that when it is released into the environment, it tends to move toward groundwater. Once in groundwater, it spreads out and becomes diluted as it travels with the groundwater flow.

Sulfolane is a man-made industrial solvent used in a wide variety of applications including oil refining, natural gas production, the production of insecticides, herbicides, and fungicides, lithium batteries, pharmaceuticals, printer ink, circuit board cleaning solutions, semiconductors and soap.

At Flint Hills, sulfolane is used as the primary solvent in a sulfolane extraction unit that removes the aromatics such as benzene, toluene and xylenes from refined oil so that they can later be added at very specific concentrations for each type of gasoline produced at the refinery. Sulfolane extraction units are closed-loop systems so pure sulfolane does not typically go down drains; however, some residual sulfolane can remain in the final gasoline product and in the wastewater from the units because of some mixing of these fluids during the extraction process. Flint Hills' wastewater stream goes through the company's wastewater treatment plant and is regulated through its wastewater discharge permit.

Corrosion is a concern in sulfolane extraction units, yet – based on research internationally, and responses from companies and regulatory agencies – corrosion has never become severe enough to cause a sulfolane leak or spill. That is because corrosion causes inefficiencies in the system, so any instances of corrosion were discovered long before they could cause leaks or spills.

Sulfolane extraction units, including the piping, are made of steel. Sulfolane itself does not corrode steel; instead, sulfolane's acidic by-products cause the corrosion. Those by-products occur when sulfolane degrades – from high temperatures or if oxygen or other impurities get into extraction units through leaks. (Most sulfolane extraction units have sulfolane recycling systems, where the by-products are removed before the sulfolane is used again. The sulfolane is usually recycled as much as possible.)

The research done for this report indicated that there is sparse government regulation of sulfolane. The U.S. Environmental Protection Agency does not regulate sulfolane. The transportation of sulfolane is also not regulated in the United States as a hazardous material or a dangerous good. Texas is the only state that has established statewide cleanup levels for sulfolane.

Internationally, Environment Canada, Canada's equivalent to the U.S. Environmental Protection Agency, is the most progressive regulatory authority in establishing environmental quality guidelines for sulfolane-contaminated soil and groundwater. Its level for drinking water is 90 parts per billion. Sulfolane-contaminated sites exist in Canada near sour-gas processing complexes that use sulfolane in the natural-gas sweetening process. (Natural gas that has carbon dioxide and other compounds is called "sour gas"; when sulfolane is used to remove those compounds, it is called a "sweetening" process.)

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## **Sulfolane research** *From Page 15*

In the early 1980s, responding to the increased use of sulfolane in both the oil and natural gas industries, Shell Oil Company researchers performed the foundational work on remediating sulfolane from spills at natural gas processing facilities. Since Shell's work, independent contractors and university researchers worldwide, as well as the Canadian government, have worked to develop regulatory cleanup levels and design remediation systems for sulfolane-contaminated sites.

Findings from the research on sulfolane remediation processes indicate that the primary attenuation mechanism – the ability to break down the contamination into non-hazardous components – is biodegradation in an aerobic environment, where the sulfolane is broken down by bacteria in soil or water, in contact with the air.

Case studies in Canada show that an effective remediation option for sulfolane-contaminated groundwater is through biological wastewater treatment processes. Those systems are functional in Alberta and have proven to reduce sulfolane concentrations in groundwater to well-below the established cleanup levels.

Overall, there are more than 150 sulfolane extraction units licensed throughout the world. Despite that number, only a few countries have established cleanup levels for sulfolane in the environment.

Since sulfolane is generally not considered by governments to be highly toxic and is often not regulated as a water or soil contaminant, limited case studies of sulfolane spills and their remediation have been reported in the United States and internationally. The findings from the research contained in this report will provide a better understanding of the chemical and its background for addressing sulfolane contamination in the environment.

*For the full report, on the Web go to [dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm#sulfo](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm#sulfo).*

## **For More Information**

Visit the Alaska Department of Environmental Conservation's North Pole sulfolane Web site at [dec.alaska.gov/spar/csp/sites/north-pole-refinery/](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/).

Join DEC's sulfolane Listserv, an email subscription list, by going to the sulfolane Web site or by going to [dec.alaska.gov/spar/csp/sites/north-pole-refinery/email\\_sulfo.htm](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/email_sulfo.htm). If you'd rather receive hard copies of our mail outs, contact the Contaminated Sites Program's Susan Erben or Denise Elston below.

Still have questions? Here are some people to contact on various topics:

**Contaminated Sites – Contact DEC, Spill Prevention and Response Division, Contaminated Sites Program:**  
Ann Farris, environmental engineer and TPT coordinator – (907) 451-2104, [ann.farris@alaska.gov](mailto:ann.farris@alaska.gov).  
Denise Elston, environmental program specialist – (907) 465-5207, [denise.elston@alaska.gov](mailto:denise.elston@alaska.gov).  
Susan Erben, public involvement coordinator – (907) 465-5206, [susan.erben@alaska.gov](mailto:susan.erben@alaska.gov).

**Health-related information – Contact the Alaska Department of Health and Social Services, Division of Public Health, Epidemiology Section:**  
Nim Ha, acting Environmental Public Health Program manager – (907) 269-8028, [nim.ha@alaska.gov](mailto:nim.ha@alaska.gov).

**Public water supplies – Contact DEC, Division of Environmental Health, Drinking Water Program:**  
Cindy Christian, compliance program manager – (907) 451-2138, [cindy.christian@alaska.gov](mailto:cindy.christian@alaska.gov).  
Lee Johnson, environmental engineer – (907) 451-2179, [lee.johnson@alaska.gov](mailto:lee.johnson@alaska.gov).

**Water testing, alternate water supplies, in-home water treatment systems, and other refinery issues – Contact Flint Hills Resources:**  
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# Sulfolane Investigation Update

October  
2011

*This update is provided by the Technical Project Team to inform the North Pole community of recent developments in the investigation and remediation of soil and groundwater contamination related to the North Pole refinery.*

## DEC establishes faster cleanup schedule

In September, the Alaska Department of Environmental Conservation (DEC) and Flint Hills Resources (FHR) reached an agreement on an accelerated timeline for investigating and remediating the North Pole sulfolane groundwater contamination.

DEC regulators established new dates for completion of the project's 19 main tasks – in many cases advancing them by as much as 1 1/2 years. The decision to advance the timetable came after careful review of FHR's proposed schedule. Overall completion of the project is now scheduled for late 2012, rather than the initial proposal of the summer of 2014.

According to Steve Bainbridge, manager of DEC's Contaminated Sites

Program, this contamination "... has impacted the City of North Pole drinking water wells, as well as at least 230 private drinking water wells and additional parcels of land that have yet to be developed ... making this site our highest priority to investigate."

FHR has accepted the revision and is actively revamping its cleanup activity timeline to ensure the new target dates are met. "FHR shares the state's sense of urgency and remains committed to aggressively protect the public and remediate the contamination," said Loren Gamer, Flint Hills Resources' groundwater project manager.

Ann Farris, DEC's project manager said, "This is an aggressive schedule for the size and complexity of the

problem, but the entire technical project team is committed to understanding and cleaning up the contamination as quickly as possible. We have been bringing in outside experts and the university to assist us and we will continue to bring in whatever resources are needed to be certain we are being protective."

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## Federal assistance requested for new sulfolane study

The Alaska Department of Environmental Conservation has formally requested the federal government to nominate sulfolane for further study of its potential effect on human health.

The study would fill a significant void in the scientific community's understanding of the human health hazards associated with the chemical currently affecting many North Pole residents' groundwater.

The request for nomination was submitted to the National Toxicology Program (NTP), an interagency effort of the National Institutes of Health, the Centers for Disease Control and Prevention, and the Food and Drug Administration.

According to its website, NTP's mission is "to evaluate agents of public health concern by developing and applying tools of modern toxicology and molecular biology."

Each year, NTP selects a limited number of chemicals for further study about which little or nothing is currently known of their effects on human health, and where further scientific understanding would have the broadest impact. NTP's review of this year's requests for nominations for further study is scheduled to be completed by December 2011.

If sulfolane is selected for further study, the process of designing scientific research and conducting experiments would then begin. These steps could be lengthy, with actual results of the toxicity study not published for several years. Nonetheless, DEC regulators see a nomination as an encouraging step in their effort to understand more about the toxicity of sulfolane.

"The NTP nomination is an important step in addressing community concerns about past contaminant expo-

sure and helping us gain a higher level of confidence that we understand what 'safe' means concerning sulfolane," said Ann Farris, an environmental engineer with DEC's Contaminated Sites Program and its Technical Project Team coordinator for the North Pole refinery cleanup.

"Rather than rehashing older studies, we want to add to the science with well-designed research conducted by one of the best independent agencies in the country whose primary mission is to specifically address these issues," Farris said.

The request for nomination received letters of support from Fairbanks North Star Borough Mayor Luke Hopkins, Alaska District F Sen. John Coghill, the Alaska Department of Health and Social Services, and the U.S. Agency for Toxic Substances and Disease Registry.

# FHR's drinking water sampling and resampling efforts

In March, Flint Hills Resources began providing long-term alternative water solutions for residents in the North Pole area who are outside City of North Pole water services and have detectable levels of sulfolane in their drinking water wells. To date 193 residents have received one of three options Flint Hills has offered.

These options include bottled-water service, a bulk-water-tank system, or a point-of-entry water treatment system. FHR is providing bottled-water service as an interim drinking water source to affected residents who are in the process of selecting an alternative long-term water solution.

With any of the three long-term options, FHR has also offered an above-ground garden water tank. Local contractors installing these systems

will continue to do so, weather permitting, until all residents with detectable levels of sulfolane have their solution of choice installed.

Beginning in July, Flint Hills contracted with Shannon & Wilson, a geotechnical and environmental consultant, to resample 165 wells within and along the plume boundary area that did not show a detectable level of sulfolane in the first round of sampling.

Flint Hills commissioned the re-sampling because of the development of a more sensitive laboratory test that detects sulfolane at much lower levels than was previously possible. The earlier tests were able to identify sulfolane at a level of about 10 parts per billion (ppb) or higher. The more sensitive test is able to detect sulfolane at a level of about 3.1 ppb or higher (de-

pending on the sample size). As the re-sampling continues, homeowners whose wells show detectable levels of sulfolane at the new lower detection level are offered the same three alternative water solutions mentioned earlier. In other words, everyone whose well shows a detectable level of sulfolane – under either the earlier tests or the new tests – will be offered an alternative water solution.

As a precaution, FHR will continue to provide bottled water delivery service to roughly 200 residents whose wells have no detectable levels of sulfolane because those homeowners are located in or adjacent to the plume. FHR will continue the bottled water deliveries as the plume and its movement are evaluated and better understood.

## Technical Project Team background

In March 2010, the Alaska Department of Environmental Conservation's Contaminated Sites Program established a Technical Project Team to provide comprehensive and coordinated oversight for the investigation into the release of sulfolane at the Flint Hills Resources refinery in North Pole. The team consists of experts in the fields of toxicology, engineering, hydrology, environmental chemistry and other relevant fields, and is working to ensure the protection of human health and the environment.

### TPT Priorities

- Eliminate the current exposure to sulfolane.
- Pursue aggressive on-site remediation.
- Establish a monitoring network that adequately measures the success of the remediation at eliminating off-site contaminant migration and removing the contamination on site.
- Achieve and maintain source control:
  - Determine an inspection process and operational policies that eliminate systemic releases or leaking issues and minimize the potential for new spills.
  - Aggressively respond to and clean up any new spills that do occur.
- Determine the extent of the contamination downgradient and potential for movement of the plume in order to develop a remedial strategy that will control exposure for the duration of time it takes to achieve final cleanup levels via engineered and/or natural mechanisms.
- Complete an evaluation of risk that accounts for all exposure pathways and cumulative risk.

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*For more information, visit DEC's North Pole refinery sulfolane website at:  
[dec.alaska.gov/spar/csp/sites/north-pole-refinery/](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/)*



*Clockwise from right: A DEC exercise evaluator takes notes at an Incident Management Team briefing at the Aug 11 North Pole refinery exercise.*

*The initial Flint Hills spill response team arrives on scene and begins unloading.*

*Responders work to control the simulated spill.*

*Response team members discuss the current status and next steps in the contingency plan procedure.*

*(DEC photos)*



## **Spill drill tests FHR's emergency capabilities**

### ***DEC verifies readiness for response to oil spill at North Pole refinery***

The North Pole Refinery was the recent scene of an unannounced "spill drill" emergency response exercise called by the Alaska Department of Environmental Conservation.

The purpose of the Aug. 11 drill was to exercise and evaluate the Flint Hills Resources North Pole Refinery Oil Discharge Prevention and Contingency Plan (ODPCP). It also allowed on-scene DEC evaluators to verify the response readiness of both Flint Hills Resources personnel and its contractors.

ODPCPs are facility-specific documents, approved by DEC regulators, containing pre-established response procedures to be implemented in emergency situations. State law requires all petroleum-related facilities to have an approved ODPCP in place and ready for use. Additionally, each facility must ensure its staff is trained in ODPCP procedures and that its

response capabilities are exercised annually.

This DEC drill was designed to determine how refinery staff would respond to a major oil release onto and flowing outside of facility property. Specifically, the exercise tested how the organization would activate its incident management team (IMT), set up an information center, deploy resources, make notifications and public announcements, perform response tactics using appropriate safety precautions, control the source of the release, recover spilled hydrocarbon product and respond to unexpected developments in real-time.

The unannounced drill took the FHR personnel and contractors by surprise. Even so, they immediately activated the response team, set up an emergency response office, and went through the necessary procedures for source control and recovery, while

maintaining health and safety precautions.

DEC exercise evaluators found both FHR employees and contractors well prepared and well versed in spill response tactics.

"While there were a few lessons learned, the unannounced drill was quite useful in determining the capability of FHR personnel and their contractors to respond to a major spill, if ever required," according to Bob Tisserand, an environmental program specialist for DEC's Industry Preparedness Program.

He credited FHR's observed preparedness to its participation in response training programs. "Deploying response teams in realistic training and exercise scenarios is the most effective preparation for an actual emergency."

# TPT subgroups' status report

## Chemistry

### Recent activities:

- Continuing to develop methods with commercial and state laboratories that accurately detect sulfolane in water, soil and produce. There is no certified federal or state laboratory method for sulfolane and the subgroup is proceeding to develop consistent methods for all laboratories that analyze for sulfolane to ensure the results are accurate and comparable.
- Developed data quality objectives for the sulfolane analysis of plant tissue.
- Streamlined the data validation process to ensure all data are useable for site investigation and remediation efforts.

## Toxicology

### Recent activities:

- Released the Alaska Department of Health and Social Services garden sampling conclusions and recommendations fact sheet, available at [dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm) under "Fact Sheets." The subgroup discovered that edible garden plants can take up sulfolane present in water. Sulfolane was found in all parts of plants sampled (leaves, fruits, flowers, stems and roots). People can come in contact with sulfolane by eating affected produce.
- Released the Agency for Toxic Substances and Disease Registry (ATSDR) second health consultation, available at [dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm) under "Human Health." The report re-evaluated available sulfolane toxicity data and slightly lowered public health action levels for sulfolane in drinking water.
- Collaborating with the U.S. Environmental Protection Agency, ATSDR, National Toxicity Program (NTP),

and University of Alaska Fairbanks (UAF) to identify areas of uncertainty in evaluating sulfolane toxicity and determine additional study needs.

- Discussions with the NTP to pursue the nomination of sulfolane for additional toxicology research on the health effects of long-term exposure.

## Site Characterization and Remediation

### Recent activities:

- Completed a technical review of the Site Characterization and First Quarter Groundwater Monitoring Report. Also participated in a comment resolution meeting with the Alaska Department of Environmental Conservation and Flint Hills Resources to discuss and resolve concerns.
- Submitted technical review comments on the Site Characterization Work Plan Addendum.
- Participated in a groundwater modeling meeting with DEC, FHR and UAF experts to better understand the modeled components of the fate and transport of sulfolane migration in the aquifer.
- Continuing to review the on-site monitoring well network and off-site residential well database.
- Proposed a more aggressive timeframe for the completion of the site investigation and remediation, in order to reach a final cleanup action plan by December 2012.
- The subgroup continues to assess the technical findings of the 2011 field season.

## Drinking Water

### Recent activities:

- FHR constructed two new City of North Pole public drinking water production wells located outside of the contaminant plume. Approval to operate the wells is currently

undergoing review by Drinking Water Program engineers, with final operational approval expected in fall 2011. Samples taken from the new wells have shown levels of all regulated contaminants to be below allowable maximum levels.

- Collecting and analyzing monthly samples from the new wells with results being non-detect. Monthly monitoring will continue through the end of 2011. At that time, if results remain at non-detect, the monitoring requirement will be reduced to quarterly sampling for one year.
- The Church at North Pole, which manages a federally regulated public water system, is currently in the engineering plan review process for treatment to remove sulfolane from the facility's drinking water. DEC's Drinking Water Program engineers are expected to grant construction approval in fall 2011.

## Risk Communication

### Recent activities:

- Providing the North Pole community and interested stakeholders the most recent available project information.
- Organized a community workshop that included inviting national experts to North Pole to provide the most current information, and answer community questions, regarding the toxicity of sulfolane.
- Developed and distributed a survey for community members and affected stakeholders to help identify and better understand the North Pole community's concerns regarding the sulfolane release and investigation, available at <http://www.surveymonkey.com/s/PYHHKB2>.
- Published a "Frequently Asked Questions" document produced as a result of questions gleaned from discussions with the public (available at [dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm](http://dec.alaska.gov/spar/csp/sites/north-pole-refinery/documents.htm)).

