

STATE OF ALASKA

SARAH PALIN, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File No.: 2601.26.035

May 1, 2007

Ron Stroman
Alaska Department of Transportation and Public Facilities
4111 Aviation Drive
Anchorage, Alaska 99519

RE: Mark Air - Kodiak
Record of Decision

Dear Mr. Stroman,

The Department of Environmental Conservation, Contaminated Sites Program (ADEC) reviewed the environmental records associated with the former underground storage tanks (USTs) at the former Mark Air – Kodiak site. This site had been contaminated by the release of a hazardous substance; however, based on the information provided to date, ADEC has determined that no further remedial action is required, and that the Mark Air - Kodiak former USTs can be closed subject to the conditions outlined in this document. The hazardous substance contamination has been adequately addressed and does not pose an unacceptable risk to human health or the environment.

This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the ADEC determination.

Introduction

Site Name and Location

Mark Air - Kodiak
Lots 2 and 3b, Block 1200
Lots 2a and 3a, Block 1300
Kodiak Airport
Kodiak, Alaska

Name and Mailing Address of Contact Party:

Ron Stroman
Alaska Department of Transportation and Public Facilities
4111 Aviation Drive
Anchorage, Alaska 99519

Database Record Key and CS file number:

ADEC Reckey # 1993250015901

LUST file # 2601.26.035

Regulatory authority under which the site is being cleaned up:

18 AAC 78

Background

Five USTs were utilized at the Mark Air - Kodiak facility lots including:

- Two 10,000-gallon Jet A fuel USTs located on Lot 3a, Block 1300
- Two 1,000-gallon USTs, one for Jet A and one for AvGas located on Lot 2a, Block 1300
- One 500-gallon gasoline UST located at Lots 2 and 3b, Block 1200

Cleanup Actions

The two former 10,000-gallon USTs were removed from a common excavation in 1998, however confirmation samples collected from the bottom of the excavation indicated contaminated soil remained. In 1999 approximately 730 cubic yards of contaminated soil was excavated from the former tank area and piping run which was stockpiled at the Kodiak airport. The excavation extent was limited as it approached the property boundary with Andrew Airways. Confirmation soil samples collected from the bottom and sidewalls of the excavation contained diesel-range organics (DRO) up 1,700 milligrams per kilogram (mg/kg) and benzene up to 0.036 mg/kg in a sample collected along the property boundary. Groundwater was not encountered in the excavation. The excavation was lined along the sidewall where contamination remained prior to being backfilled.

The two former 1,000-gallon USTs were removed from a common excavation in 1999. Approximately 600 cubic yards of contaminated soil was removed from the area around the tanks and stockpiled at the Kodiak airport. Confirmation samples collected from the bottom and sides of the excavation did not contain contaminants at concentrations above ADEC cleanup levels. Groundwater was not encountered in the excavation.

The 500-gallon gasoline UST was removed in 1990, but no confirmation sample data was submitted to the ADEC. The former location of this tank is now under a concrete pad upon which was built an addition to the warehouse. In 1999, one soil boring was advanced at the former location of the tank. Soil samples were collected at 2.5, 5, and 10 feet below ground surface (bgs). Contaminants were not detected above ADEC cleanup levels.

In 2004, eight test pits were excavated at Lots 2a and 3a and ten soil samples were submitted for laboratory analysis. DRO was detected at 1,750 mg/kg and benzene was detected at 0.0286 mg/kg in one test pit near the former 10,000-gallon USTs.

In 2005, three soil borings were advanced near the former 10,000-gallon USTs and completed as monitoring wells to evaluate potential contaminant migration to groundwater. DRO was

detected in soil at 3,280 mg/kg in one sample at 7.5 to 9.5 feet bgs. Groundwater was located at approximately 30 feet bgs. Groundwater samples were collected from the newly installed monitoring wells on two occasions in 2005. Contaminants were not detected in groundwater above ADEC cleanup levels during either sampling event.

In 2006, the contaminated soil stockpile was segregated and 15 soil samples were collected for analysis from the minus 2-inch fraction. One sample contained benzene at 0.0236 mg/kg; no other analytes were detected at concentrations above ADEC cleanup levels. The segregated soil was approved for use in grading roadways at the airport.

Contaminants of Concern

Diesel Range Organics

Benzene

Cleanup Levels

The soil cleanup levels established for this site are: 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Diesel Range Organics	250
Benzene	0.02

Groundwater cleanup levels are those listed in 18 AAC 75.345 Table C.

Pathway Evaluation

The pathways evaluated at this site include the human health exposure pathways of soil ingestion and inhalation of vapors. The inhalation and ingestion pathways may be complete but contaminant concentrations are below inhalation and ingestion cleanup levels

The migration to groundwater pathway may be complete but groundwater was not encountered during the excavation, groundwater samples do not show evidence of contamination, and groundwater is not used as a drinking water source at the airport.

ADEC Decision

The cleanup actions conducted at the former Mark Air – Kodiak USTs were effective in removing the majority of impacted soil associated with the former USTs. There is contamination remaining above established cleanup levels along the southeastern property boundary but ADEC determined there is no unacceptable risk to human health or the environment, and this site will be conditionally closed.

This decision is subject to the following conditions:

1. A Notice of Environmental Contamination will be recorded on the ADEC database to document that there is residual contamination remaining on site above the most stringent ADEC cleanup levels;
2. Any proposal to transport soil off site requires ADEC approval in accordance with 18

AAC 78.274(b)

3. ADEC will decommission the three monitoring wells.

This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

Site closure (without conditions) can be achieved when soil sampling confirms that all soil meets the most stringent ADEC cleanup levels.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have questions about this closure decision, please contact William O'Connell at (907) 269-3057.

Sincerely,



Jim Frechione
Environmental Manager

Cc: Stafford Glashan, Shannon and Wilson