

# STATE OF ALASKA

## DEPT. OF ENVIRONMENTAL CONSERVATION CONTAMINATED SITES PROGRAM

**SARAH PALIN, GOVERNOR**

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File No.: 2407.38.013

February 8, 2007

Ms. Amy Fuller Lyman  
Manager Environmental Projects  
Alaska Airlines  
Box 68900 - SEAZE  
Seattle WA, 98168-0900

RE: ERA Aviation, Bethel Airport Facility  
Record of Decision

Dear Ms. Fuller Lyman

The Department of Environmental Conservation, Contaminated Sites Program (ADEC) has reviewed the administrative records for ERA Aviation, Bethel Airport Facility. This site had been contaminated by the release of a hazardous substance; however, based on the information provided to date, ADEC has determined that the ERA Aviation, Bethel Airport Facility 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

ERA Aviation, Bethel Airport Facility  
Bethel, Alaska

#### Name and Mailing Address of Contact Party:

Ms. Amy Fuller Lyman  
Manager Environmental Projects  
Alaska Airlines  
Box 68900 - SEAZE  
Seattle WA, 98168-0900

Database Record Key and CS file number:

ADEC Reckey # 1996250121901

CS file #2407.38.013

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 70

**Background**

Petroleum impacted soil was found at the former location of two, 1,000-gallon aboveground storage tanks (ASTs) used to store Jet A-50 fuel. The ASTs were located north of the former ERA Aviation office/warehouse/terminal building and west of an asphalt apron. The property is owned by the State of Alaska and is currently leased to Alaska Airlines.

**Cleanup Actions**

Approximately 2,500 cubic yards of petroleum impacted soil was excavated from the site to an average depth of 6 feet bgs in 1999. Confirmation samples collected from the bottom and sides of the excavation contained diesel range organics up to 6,100 mg/kg, gasoline range organics up to 4,330 mg/kg and benzene up to 8.44 mg/kg. Additional soil borings advanced at the time of the excavation did not find contamination above the concentrations found in the excavation and determined that petroleum impacted soil did not extend laterally beyond the area that was excavated.

Excavated soils were stockpiled on site and eventually moved to an area operated by the Alaska Department of Transportation and Public Facilities, who has accepted responsibility for the handling of the stockpiled soil.

Following the excavation of petroleum impacted soil, Alaska Airlines built a new cargo terminal on top of the excavated area. The new terminal was constructed with a fuel proof liner at the base of the building to mitigate potential vapor intrusion into the building from the remaining contaminated soil below.

Groundwater was not encountered in the excavation or in any of the soil borings, which were advanced to approximately 25 feet bgs where permafrost was encountered.

**Contaminants of Concern**

Diesel Range Organics (DRO)

Gasoline Range Organics (GRO)

Benzene

**Cleanup Levels**

**The soil cleanup levels established for this site are: 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Ingestion cleanup levels**

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Diesel Range Organics	10,250
Gasoline Range Organics	1,400
Benzene	150

### **Pathway Evaluation**

The pathways evaluated at this site include the human health exposure pathways, soil ingestion and inhalation of vapors. The ingestion pathway may be complete, but the contaminated material is below a building and at least 6 feet of clean fill so exposure is unlikely. Additionally contaminant concentrations do not exceed levels based on risk to human health.

The new terminal at the site is served by a drinking water well that is located approximately 150 feet from the terminal. Groundwater flow direction has not been determined because groundwater was not encountered above the permafrost during any of the excavation or soil boring activities. The well log for this well indicates permafrost or ice lenses from 42 to 378 feet bgs. The well is screened from 412 to 422 feet bgs and was completed using bentonite chips to seal the annular space throughout the frozen interval. Because of these conditions, the migration to groundwater pathway is considered incomplete and the remaining contamination does not pose a risk to drinking water at the site.

Migration of vapor contamination to indoor air may be possible due to elevated concentrations of volatile contaminants in close proximity to the existing structure, or under the floor of the building itself. Based on the buildings construction, the sub grade liner should mitigate the potential for vapor intrusion, however there is a possibility that vapors may migrate into the building at concentrations that could pose a risk to human health

Please be aware that this pathway may be complete at this site. Therefore, the owner and/or operator of the building may wish to monitor the indoor air in accordance with standard sampling protocol for this pathway and/or take precautionary measures to adequately vent or implement an air exchange system that would prevent the migration of hazardous vapors into the building.

### **ADEC Decision**

The cleanup actions conducted at the ERA Aviation, Bethel Airport Facility were effective in removing the majority of impacted soil. There is a minor amount of contamination remaining above established cleanup levels but ADEC has determined there is no unacceptable risk to human health or the environment and this site will be conditionally closed. However, additional cleanup may be required when the terminal building is removed.

This decision is subject to the following conditions:

1. A Notice of Residual 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 75.325(i)
3. Alaska Airlines must notify ADEC if the existing structure is removed.

In accordance with 18 AAC 75.380(d)(2), this determination 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: Bob Norton, ADOT&PF Leasing  
Robert Holbrook, ADOT&PF  
Ron Strohman, ADOT&PF  
L.J. Davis, Bethel ADOT&PF Airport Manager