

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN, GOVERNOR

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File: 2100.38.480
Return Receipt Requested
No: 7002 2410 0005 3103 7371

January 6, 2009

Jeff Mulholland
Inlet Petroleum Company
459 West Bluff Drive
Anchorage, AK 99501

Re: Record of Decision (ROD); Rust's Flying Service Jet-A AST Release
Cleanup Complete Determination

Dear Mr. Mulholland:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with Rust's Flying Service Jet-A AST Release located at 4525 Enstram Circle, Anchorage, Alaska. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

This decision is based on the administrative record for Rust's Flying Service Jet-A AST Release, which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Anchorage, Alaska. 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 Cleanup Complete Determination.

Introduction

Site Name and Location:

Rust's Flying Service Jet-A AST Release
4525 Enstram Circle
Anchorage, Alaska 99501
NE 1/4 of Section 34, Township 13N, Range 4W, Seward Meridian

Name and Mailing Address of Contact Party:

Jeff Mulholland
Inlet Petroleum Company
459 West Bluff Drive
Anchorage, AK 99501

Database Record Key and File Number:

File: 2100.38.480

Hazard ID: 4359

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

On August 13, 2006 approximately 50 gallons of Jet-A (Diesel #1) fuel spilled from the overflow of an aboveground storage tank onto a concrete pad and within the Lake Hood shoreline and dock area. A petroleum sheen was noted on Lake Hood and reporting, containment, and recovery efforts were begun immediately. On September 25, 2006 Shannon and Wilson conducted soil sampling to characterize the soil between the tank and shoreline of Lake Hood. On October 23, 2006 Shannon & Wilson directed the excavation (approximate dimensions: 7 ft. by 24 ft. by 1.5 ft. deep) and treatment of contaminated soil. Excavation was stopped due to the discovery of shallow groundwater and an electrical conduit line within the excavation pit. Soil samples collected at this site have been tested for: diesel range organics (DRO); gasoline range organics (GRO); and benzene, toluene, ethylbenzene and xylene (BTEX).

Characterization and Cleanup Activities

During the soil excavation and removal in 2006, approximately 13 cubic yards of soil were excavated, stockpiled and eventually treated at Alaska Soil Recycling (ASR). Three confirmation soil samples were collected from the depths of the excavation, approximately 1.5 feet below ground surface. These samples were analyzed for: BTEX, DRO and GRO. Benzene, GRO, and DRO were detected at concentrations that exceeded cleanup levels. GRO was detected at a maximum concentration of 438 mg/kg; DRO was detected at a maximum concentration of 1,520 mg/kg; and benzene was detected at a maximum concentration of 0.161 mg/kg.

During June and July 2008, Shannon and Wilson conducted site characterization activities to determine if groundwater and/or surface water were impacted from the August 2006 spill. Three monitoring wells were installed and two passive diffusion bags were deployed along Lake Hood shoreline in the sediment for the collection of groundwater and pore water samples. Three soil, three groundwater, and two pore water samples with one duplicate pore water sample were collected and analyzed for contaminants of concern (COC). No COCs were detected above the most stringent migration to groundwater pathway 18 AAC 75.341 Method Two soil ADEC cleanup level or 18 AAC 75.345 Table C cleanup level. No sheening from the petroleum hydrocarbon release has been observed since cleanup efforts were conducted in 2006.

Contaminants of Concern

- Gasoline Range Organics (GRO)
- Diesel Range Organics (DRO)
- Benzene

Cleanup Levels

The soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Benzene	0.025
GRO	300
DRO	250

The groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
Benzene	0.005
GRO	1.3
DRO	1.5

Pathway Evaluation

The exposure pathways for human health and the environment that were evaluated include the following: direct contact with soil; outdoor inhalation of vapors, and ecological. The direct contact with soil and outdoor inhalation of vapors pathways may be complete but the remaining contaminant concentrations do not exceed the Method Two "Ingestion" or "Inhalation" levels in Tables B1 and B2 established in 18 AAC 75.341. Populations of sensitive ecological receptors (e.g. waterfowl and fish) are not believed to be at risk since contaminants of concern were not detected in pore water at the sediment surface water interface. No violations of 18 AAC 70 water quality standards were detected after the October 2006 cleanup. Contaminated soil left in place is roughly 40 feet from an occupied building and is not believed to exist in sufficient quantity to pose an indoor inhalation risk. Therefore, the vapor intrusion pathway is not believed to be complete.

The exposure pathway analysis above was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be De Minimis Exposure or Pathway Incomplete.

ADEC Decision

The cleanup actions to date have served to excavate and adequately remove the majority of contaminated soil from the site. Groundwater and surface water are not believed to be contaminated above applicable 18 AAC 75 Method Two or Table C cleanup levels following ADEC's review of Shannon and Wilson's "Site Characterization 4525 Enstram Circle Anchorage, Alaska" report, dated November 2008. Furthermore, ADEC has determined that groundwater is not a current or reasonably expected future source of drinking water in accordance with 18 AAC 75.350.

Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Cleanup Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75325(i). Since this site has not met the most conservative soil cleanup levels, this letter does not serve as your approval for future off-site movement and disposal of soil associated with this release. It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with 18 AAC 75.380(d) 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.

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 the ADEC project manager, Todd Blessing at (907) 269-7699.

Sincerely,



Rich Sundet
Environmental Manager

Cc: Scott Lytle, ADOT&PF, Anchorage International Airport
Stafford Glashan, Shannon & Wilson, Anchorage