

# STATE OF ALASKA

**SARAH PALIN, GOVERNOR**

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

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File: 330.38.022  
Certified Return Receipt  
Article No: 7007 3020 0000 1948 8667

March 11, 2009

Jan Shifflet  
Alyeska Pipeline Service Company  
Mail Stop 507  
PO Box 196660  
Anchorage, AK 99519-6660

Re: Record of Decision (ROD); Alyeska PS 10 Tank 200  
Cleanup Complete Determination-Institutional Controls

Dear Mr. Shifflet:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Alyeska Pump Station (PS) 10 Tank 200 located at Mile 218 Richardson Hwy, Alaska. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required as long as the site is in compliance with established institutional controls.

This decision is based on the administrative record for the Alyeska PS 10 Tank 200 which is located in the offices of the Alaska Department of Environmental Conservation 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 with ICs determination.

## **Introduction**

### Site Name:

Alyeska PS 10 Tank 200  
Mile 218 Richardson Hwy  
Near Paxson, Alaska 99737

### Name and Mailing Address of Contact Party:

Jan Shifflet  
Alyeska Pipeline Service Company  
Mail Stop 507  
PO Box 196660  
Anchorage, AK 99519-6660

**Database Record Key and File Number:**

ADEC Reckey: 1992720100801

File: 330.38.022

Hazard ID: 1726

**Regulatory authority under which the site is being cleaned up:**

18 AAC 75

**Background**

In addition to large releases of crude oil in 1980 and 1992, this Alyeska site has a history of numerous smaller spills within a large diked, secondary containment area with no liner.

Soil samples collected at this site have been tested for benzene, toluene, ethylbenzene, xylenes (BTEX), gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), and total recoverable petroleum hydrocarbon (TRPH). Groundwater samples were analyzed for BTEX and TRPH.

**Contaminants of Concern**

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

**Cleanup Levels**

The soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2 Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
• Gasoline Range Organics	300
• Diesel Range Organics	250
• Benzene	0.025
• Toluene	6.9
• Ethylbenzene	6.5

**Site Characterization and Cleanup Actions**

A corrective action was conducted in 1993 which included the removal of about 900 cubic yards of contaminated soil. Excavation of impacted soil was continued to the maximum vertical and horizontal extents practical in order to maintain structural integrity of permanent structures. Confirmation samples contained concentrations up to 9,910 mg/kg DRO and 1,150 mg/kg GRO as well as benzene, toluene, and ethylbenzene up to 1.33, 11.0 and 12.7 mg/kg respectively.

Groundwater (GW) samples were collected in 1993, 1994, and 1995 with the only detectable results in 1993 TRPH samples. These GW monitoring wells were decommissioned in 2007.

A bioventing system operated between 1997 and 2001. In 2002, two borings were advanced to assess remaining contamination. Four soil samples were analyzed for GRO, DRO, RRO, and BTEX and there were no detectable results.

### Pathway Evaluation

The exposure pathways for human health that were evaluated include: inhalation of outdoor air; ingestion of and direct contact with soil; and ingestion of groundwater. The ingestion of/direct contact with soil and outdoor inhalation pathways may be complete but the risk is considered acceptable because any concentrations found were below applicable cleanup levels, and the site is fenced with only site restoration activities planned for the foreseeable future.

The groundwater pathway may be complete but this risk is considered acceptable because groundwater did not appear to have been impacted during the previous investigations. Furthermore, the public drinking water supply well, which is located about 750 feet from the site, is cross gradient to the site gradient, and is not currently being used according to the Alyeska Conceptual Site Model. The remaining exposure pathways were considered incomplete.

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 one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete.

### ADEC Decision

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete- ICs determination subject to the following.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Alyeska Pipeline Service Company shall report to ADEC every five years to document land use, or report as soon as Alyeska Pipeline Service Company becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.**
2. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
3. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 75.325 (i). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, then the Institutional Controls will be terminated.

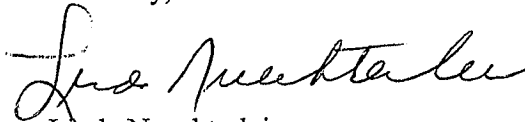
This determination is in accordance with 18 AAC 75.380(d) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

**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.

**Please sign and return *Attachment A* to ADEC within 30 days of receipt of this letter.** If you have questions about this closure decision, please contact the ADEC project manager, Keather McLoone at (907) 269-7526.

Sincerely,



Linda Nuechterlein  
Environmental Manager

Attachment A: Cleanup Complete-ICs Agreement Signature Page  
Attachment B: Site Figure

Cc: Will Runnoe, BLM – Glennallen Field Office

**Attachment A: Cleanup Complete-ICs Agreement and Signature Page\***

Alyeska Pipeline Service Company agrees to the terms of this Cleanup Complete with ICs determination as stated in this Record of Decision (ROD) document dated March 11, 2009 for the Alyeska PS 10 Tank 200, Hazard ID: 1726. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 18 AAC 75.380(d).

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Signature of Authorized Representative, Title  
Jan Shifflet/ Alyeska Pipeline Service Company

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Printed Name of Authorized Representative, Title  
Jan Shifflet/ Alyeska Pipeline Service Company

**Note to Responsible Person (RP):**

After making a copy for your records, please return a signed copy of this form to the ADEC project manager, Keather McLoone, at the address on this correspondence within 30 days of receipt of this letter. After ADEC has received your signed copy, the Contaminated Sites database will be updated, and this closure decision will then take effect.

**\*Attention ADEC Administration Staff:** Please do not file this form until the ADEC project manager has updated the database.

*Attachment B: Site Figure*

