

# STATE OF ALASKA

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

SARAH PALIN, GOVERNOR

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File: 2332.26.003  
Certified Return Receipt  
Article No: 7007 3020 0000 1948 8971

May 4, 2009

Susan Schrader  
Alaska Railroad Corporation  
P.O. Box 107500  
Anchorage, Alaska 99510-7500

Re: Record of Decision: ARRC Seward Rail Yard Tanks 3 & 4  
Corrective Action Complete Determination- Institutional Controls

Dear Ms. Schrader:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed review of the environmental records associated with the ARRC Seward Rail Yard Tanks 3 & 4. 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 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 ARRC Seward Rail Yard Tanks 3 & 4, which is located in the offices of the 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 with Institutional Controls Determination.

### **Introduction**

Site Name and Location:  
ARRC Seward Rail Yard Tanks 3 & 4  
Seward, Alaska 99664

Name and Mailing Address of Contact Party:  
Susan Schrader  
Alaska Railroad Corporation  
P.O. Box 107500  
Anchorage, Alaska 99510-7500

ADEC Site Identifiers:

ADEC Reckey: 1992230032504

File #: 2332.26.003

Hazard ID: 22982

Regulatory authority under which the site is being cleaned up:

18 AAC 75 &amp; 18 AAC 78

**Background**

Petroleum impacted soils were encountered in 1992 during the excavation of Tank 3 (T3) a 500-gallon gasoline tank and Tank 4 (T4) a 1,000 gallon diesel tank. Both tanks were removed from the same excavation, and were located 1,500 feet north of the Roundhouse Building in the ARRC Railyard in Seward. The Seward rail yard has been operating since 1903. Historical activities include: the building of the railroad, port activities, and rail transportation of people and cargo.

**Contaminants of Concern**

During the investigations at this site, soil samples were analyzed for diesel range organics (DRO), gasoline range organics (GRO), and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylene (BTEX). Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Benzene

**Cleanup Levels**

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Benzene	0.025

**Site Characterization and Cleanup Actions**

Approximately 125 cubic yards of visually contaminated soil were removed during the excavation of tanks T3 and T4 in 1992 and later transported to Anchorage for thermal remediation. The excavation, which was limited to the east by railroad tracks, measured 22 feet by 21.5 feet by 8 feet in depth. Confirmation samples collected at the base of the excavation contained benzene up to 0.19 mg/kg. Clean fill was used to backfill the excavation and a PVC gallery was installed at approximately 8 feet below ground surface. No groundwater was encountered.

**Pathway Evaluation**

The exposure pathways for human health that were evaluated include the following: Outdoor Inhalation of vapors, and direct contact with soil; ingestion of groundwater and migration to groundwater pathways. The inhalation pathway may be complete, but the remaining contaminant concentrations do not exceed Outdoor Inhalation health-based soil cleanup levels

for benzene established in the Method Two, Table B1. Contaminated soil remains on site, but is located in the subsurface, making the direct contact exposure pathway incomplete.

The ingestion of groundwater pathway may be complete, but drinking water is supplied by the City of Seward and no drinking water wells exist in the vicinity of the site. Furthermore, any potentially remaining contamination in the subsurface soil is de minimis in nature and is unlikely to migrate to the groundwater in the future.

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 Minimus Exposure or Pathway Incomplete.

#### **ADEC Decision**

There is contamination remaining above established cleanup levels at ARRC Seward, but ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Corrective Action Complete- Institutional Controls 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 institutional controls may not be protective and ADEC may require additional remediation and/or institutional controls. Therefore, ARRC will report to ADEC every five years to document land use, or as soon as ARRC becomes aware of any change in land ownership and/or use. **The report can be sent to the local ADEC office or electronically to [DEC.ICUnit@alaska.gov](mailto:DEC.ICUnit@alaska.gov)**
2. 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.
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 potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.
5. The soil contamination located near the railroad tracks at the T3/T4 location is currently inaccessible (see attachment B). When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
6. The ADEC recommends that the 2-tier PVC gallery at the T3/T4 excavation be decommissioned.

7. Groundwater wells may not be installed on site without ADEC approval.

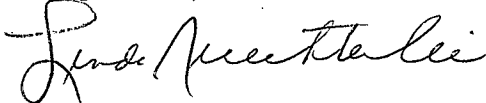
This determination is in accordance with 18 AAC 78.276 (f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

### 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 Grant Lidren at (907) 269-8685.

Approved By,



Linda Nuechterlein  
Environmental Manager

Recommended By,



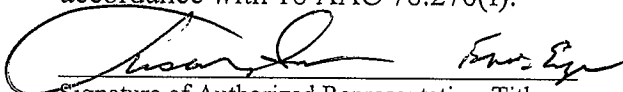
Grant Lidren  
Environmental Specialist

Attachment A: Cleanup Complete-ICs Agreement Signature Page

Attachment B: Site Figure

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

Alaska Railroad Corporation agrees to the terms of this Corrective Action Complete with Institutional Controls determination as stated in this Record of Decision (ROD) document dated May 4, 2009 for the ARRC Seward, Hazard ID: 22982. 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 78.276(f).

 Env. Engr 5/5/09

Signature of Authorized Representative, Title  
Alaska Railroad Corporation

Susan N. Schrader Env. Engr.

Printed Name of Authorized Representative, Title  
Alaska Railroad Corporation

RECEIVED

MAY 08 2009

DEPT. OF ENVIRONMENTAL  
CONSERVATION

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, Grant Lidren at the address on this correspondence within 30 days of receipt of this letter.

