

# STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

555 Cordova Street  
Anchorage, AK 99501  
PHONE: (907) 269-3057  
FAX: (907) 269-7649  
www.dec.state.ak.us

File: # 2100.38.499

July 22, 2008

Ms. Edie Knapp  
Anchorage School District  
Facilities Department  
1301 Labar Street  
Anchorage, Alaska 99515

Re: ASD East High School Diesel Tanks  
Record of Decision

Dear Ms. Knapp:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed review of the environmental records associated with Anchorage School District (ASD) East High School diesel tanks. 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 East High School diesel tanks 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 decision is based on the administrative record for ASD East High School Diesel Tanks site 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 ADEC determination.

## **Introduction**

### Site Name and Location:

ASD East High School Diesel Tanks  
4025 Northern lights Blvd  
Anchorage, Alaska 99508

### Name and Mailing Address of Contact Party:

Ms. Edie Knapp  
Anchorage School District Facilities Department  
1301 Labar Street  
Anchorage, Alaska 99515

Database Record Key and File Number:

ADEC Reckey No. 2003210123301

File: # 2100.38.499

Regulatory authority under which the site is being cleaned up:

18 AAC 75

**Background**

Three underground diesel tanks were removed during facility renovation at the school in 2003 and 2004.

**Cleanup Actions**

Tank #1 was a 500-gallon underground diesel tank that contained approximately 300 gallons of diesel fuel which was removed prior to the excavation of the tank. The tank was in good condition however diesel impacted soil was encountered adjacent to the tank resulting in the excavation and thermal treatment of approximately 175 cubic yards of impacted soil. Confirmation samples collected from the sidewalls just above the water table did not contain detectable concentrations of contaminants.

Tank #2 was a 1,000-gallon diesel tank that was filled with a fuel-water mixture which was removed prior to the excavation of the tank. The tank was in good condition however diesel impacted soil was encountered adjacent to the tank resulting in the excavation and thermal treatment of approximately 125 cubic yards of impacted soil. Confirmation samples collected from the bottom and sides of the excavation contained DRO in one sample at 1,000 mg/kg. The other three samples did not contain detectable concentrations of contaminants.

Tank #3 was a 1,000 gallon diesel tank that was filled with diesel fuel which was removed prior to the excavation of the tank. The tank was in good condition however diesel impacted soil was encountered adjacent to the tank resulting in the excavation and thermal treatment of approximately 80 cubic yards of impacted soil. Confirmation samples collected from the bottom and sides of the excavation contained DRO at 433 mg/kg and 151 mg/kg in two of the four samples.

Groundwater was encountered at approximately 16 feet below ground surface at Tank #1 but was not encountered in the other excavations. No groundwater samples were collected.

**Contaminant of Concern**

- Diesel Range Organics (DRO)

**Cleanup Levels**

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

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

**Pathway Evaluation**

The exposure pathways for human health that were evaluated include the following: ingestion of soil and groundwater, indoor and outdoor inhalation, and dermal contact with soil. The ingestion and inhalation pathways may be complete, but the contaminant concentrations remaining do not exceed inhalation or ingestion cleanup levels. The dermal contact pathway is incomplete as the remaining contaminated soil is below ground and the lot is paved.

The groundwater pathway may be complete, but groundwater is not used as a drinking water source in this area and the property is served by the municipal water supply. Further, Anchorage Municipal Code 26.40.040 prohibits a facility which is served by the utility to be connected to another water system, including a private well. Three wells were identified within 0.5 miles of the site using the USGS Groundwater Site Inventory. Two were listed as 'unused'; the third is located at Alaska Pacific University, which is connected to the municipal water supply.

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, Exposure Controlled, or Pathway Incomplete.

**ADEC Decision**

There is contamination remaining above established cleanup levels at the East High School diesel USTs, but ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be conditionally closed, subject to the following conditions:

1. A Notice of Residual Contamination will be recorded on the ADEC database to document residual contamination remaining on site above the most stringent ADEC cleanup levels. This will serve as notification to future owners/operators of the property of the environmental status of the site and any conditions that apply to future management of contamination.
2. ADEC approval is required prior to offsite transport of soil or groundwater in accordance with 18 AAC 75.370 (b).
3. Groundwater wells shall not be installed on this property without prior approval from ADEC.
4. Soil containing residual contamination may not be placed in surface water or other environmentally sensitive areas.

This determination is in accordance with 18 AAC 75.38(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.

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.

Please sign and return this Conditional Closure document for our files. If you have questions about this closure decision, please contact William O'Connell at (907) 269-3057.

Sincerely,



Linda Nuechterlein  
Environmental Manager

Anchorage School District agrees to the terms of this Conditional Closure as stated above.

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Name/Title  
Anchorage School District

CC: Aaron Banks, R&M Consulting