STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

555 Cordova Street Anchorage, AK 99501 PHONE: (907) 269-8685 FAX: (907) 269-7649 www.dec.state.ak.us

File: 2100.26.563 Return Receipt Requested

Article No: 7008 1830 0002 6349 4142

February 23, 2010

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

Re:

Decision Document - Dean's Auto Salvage USTs

Corrective Action Complete Determination

Dear Ms. Schrader:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the Dean's Auto Salvage USTs. 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 the Dean's Auto Salvage USTs, 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 this Corrective Action Complete Determination.

Introduction

Site Name and Location: Dean's Auto Salvage USTs 720 East Whitney Anchorage, AK 99510

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

ADEC Site Identifiers File#: 2100.26.563 Hazard ID: 25423

G:\SPAR\SPAR-CS\26 Case Files (LUST Sites)\2100 Anchorage\2100.26.563 Dean's Auto Salvage USTs\Dean's Auto Salvage USTs_CA
Complete Lidren.docx

Regulatory authority under which the site is being cleaned up: 18 AAC 75 and 18 AAC 78

Background

In 2006, a Site Assessment (SA) was performed on three previously removed regulated Underground Storage Tanks (USTs) as follows: a 2,000 gallon gasoline UST; a 1,000 gallon used-oil UST; and a 1,000 gallon diesel UST. Since the 1950's this property has been used primarily as an industrial yard, and since 1989 as an auto salvage business.

Contaminants of Concern

During the investigation at this site, soil samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), polychlorinated biphenyls (PCBs), heavy metals, and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Benzene
- DRO

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*.

Contaminant	Site Cleanup Level (mg/kg)
Benzene	0.025
DRO :	250

Characterization Activities

During the 2006 site assessment, two soil samples collected at the gasoline UST at 7 feet below ground surface (bgs) did not contain detectable concentrations of contaminants. Hydrocarbon impacted soil encountered near the surface was stockpiled at the site. Three soil samples collected at the groundwater interface 4.3 feet bgs at the used oil UST also did not contain detectable concentrations of contaminants. Hydrocarbon impacted soil noted in the western portion of the excavation was added to the stockpile. Two soil samples collected at the groundwater interface 6 feet bgs at the diesel UST contained benzene up to 0.0622 mg/kg. Hydrocarbon impacted soil from the southwest portion of the excavation was added to the stockpile, bringing the total stockpiled volume to 150 cubic yards.

On July 22, 2009, the 150 cubic yard onsite stockpile from the UST excavations was landspread on a south facing grassy hillside north of the Dean's Office/Shop Building. On November 16, 2009, five soil samples collected 6 inches into the landspread stockpile contained DRO up to 285 mg/kg. Benzene was not detected.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Pathway	Result	Explanation
Surface Soil Contact	De Minimis Exposure	The remaining contaminant concentrations are below direct contact cleanup levels, and are considered de minimis in volume.
Sub-Surface Soil Contact	De Minimis Exposure	The remaining contaminant concentrations are below direct contact cleanup levels, and are considered de minimis in volume.
Inhalation – Outdoor Air	De Minimis Exposure	The remaining contaminant concentrations are below inhalation cleanup levels, and are considered de minimis in volume.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	The remaining contaminant concentrations are below inhalation cleanup levels, and are considered de minimis in volume.
Groundwater Ingestion	De-minimis exposure	Confirmation soil samples did not contain detectable concentrations of contaminants except for one sample from the diesel UST excavation bottom, which contained 0.0622 mg/kg benzene and is attributed to the nearby Underground Injection Control (UIC) well, at the associated site: 2100.38.484 Dean's Auto Salvage UICs Hazard ID 4414. This site is currently being tracked as an active site on the Contaminated Sites Database and any potential impacts to groundwater will be addressed under that site. Potential groundwater contamination from the USTs is considered to be de minimis.
Surface Water Ingestion	Pathway Incomplete	Contaminant source areas are located more than 100 feet from Ship Creek. Therefore the pathway for water runoff is considered incomplete.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals, and wild foods are not harvested in this area therefore this pathway is incomplete.
Exposure to Ecological Receptors	De-minimis exposure	Remaining contaminant concentrations are below direct contact cleanup levels, and are considered to be de minimis in volume. Any exposure to ecological receptors is considered de minimis.

Notes to Table 1: "De-minimis exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. "Pathway incomplete" means that in ADEC's judgment contamination has no potential to contact receptors. "Exposure

controlled" means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

The cleanup actions to date have served to excavate and adequately remove petroleum contaminated soil from the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no unacceptable risk to human health or the environment, and this site will be designated as closed on the Department's database.

Please note there is an Underground Injection Control (UIC) well and associated site known as *Dean's Auto Salvage UICs* located on this property. (ADEC site identifiers are: Hazard ID 4414 and File No. 2100.38.484.) *Dean's Auto Salvage UICs* is currently being tracked as an **active** site on the Contaminated Sites Database, and any potential impacts to groundwater will be addressed under that site.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.600(h) and 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 closure 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 decision document, please contact the ADEC Project Manager, Grant Lidren at (907) 269-8685.

Approved By,

Recommended By,

Linda Nuechterlein

Environmental Manager

de Nuerhterlew

Grant Lidren

Environmental Specialist