

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

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File: 150.26.036

Return Receipt Requested

Article No: 7008 1830 0002 6349 3961

January 28, 2010

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

Re: Decision Document; ARRC - Broad Pass Railroad Station
Corrective Action Complete- Institutional Controls

Dear Ms. Schrader:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program has completed a review of the environmental records associated with the ARRC - Broad Pass Railroad Station. 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 ARRC - Broad Pass Railroad Station 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 Corrective Action Complete with Institutional Controls Determination.

Introduction

Site Name and Location:

ARRC - Broad Pass Railroad Station
ARRC Milepost 304.5
Broad Pass, Alaska 99729

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: 1993220025201

File: # 150.26.036

Hazard ID: 22938

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

Background

In 1993, petroleum impacted soil was encountered during the removal of two regulated 1,000-gallon diesel underground storage tanks (USTs), and associated fuel lines. The site is on a gravel pad that was placed over the native surface and was historically used as a section house with associated facilities. Currently the site is vacant with the exception of two storage sheds.

Contaminants of Concern

During the investigation at this site, soil samples were analyzed for the following: diesel range organics (DRO); gasoline range organics (GRO); residual range organics (RRO); and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Diesel Range Organics (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*.

<u>Contaminant</u>	<u>Migration to Groundwater Cleanup Level (mg/kg)</u>
DRO	250

Site Characterization and Cleanup Actions

In 1993, 25 to 35 cubic yards of petroleum impacted soil were removed during the UST excavations and stockpiled on site. A petroleum film was reported on groundwater at the bottom of the excavation 7 feet below ground surface. Two confirmation soil samples collected from the base of the excavation contained DRO up to 18,000 mg/kg. Prior to backfilling excavation with clean fill, a ventilation gallery was installed.

In 2007, soil samples were collected from the onsite stockpile and from 4 test pits excavated near the former USTs. The stockpile samples did not contain detectable concentrations of contaminants. Only soil samples from one of the test pits contained contaminant concentrations above cleanup levels. DRO was detected at 4,680 mg/kg and 4,650 mg/kg at 6 feet and 7 feet respectively, suggesting the remaining contaminated soil is de minimis in extent. Groundwater was not encountered in the test pits.

In 2009, the drainage ditch was evaluated for the potential migration of contaminants from the pad. The drainage-ditch water sample collected at the south end of the culvert did not contain detectable concentrations of contaminants.

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	Pathway Incomplete	The soil stockpile may have been land spread on site, but remaining levels of contamination are below direct contact cleanup levels
Sub-Surface Soil Contact	De-minimis exposure	Contamination remains in the subsurface, but is below direct contact cleanup levels
Inhalation – Outdoor Air	De-minimis exposure	Contamination remains in the subsurface, but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings at the site and any remaining contamination is below inhalation cleanup levels
Groundwater Ingestion	De-minimis exposure	Contamination remains in the subsurface soil above migration to groundwater cleanup levels at 7 feet bgs. The UST and 35 cubic yards of contaminated soil have been removed. Remaining contamination is considered de minimis. Furthermore this site has been cleared of all structures, is located on the rail belt with no permanent residents, and residential land use is unlikely.
Surface Water Ingestion	Pathway Incomplete	A water sample collected did not contain detectable levels of contaminants
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	De-minimis exposure	The soil stockpile may have been land spread on site, but remaining levels of contamination are below direct contact cleanup levels. 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

There is contamination remaining above established cleanup levels at the ARRC - Broad Pass Railroad Station, 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, the ARRC will report to ADEC every five years to document land use, or as soon as the 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**

2. A Notice of Residual Contamination will be recorded on the ADEC database to document that there is 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 Attachment B).
4. The ADEC recommends that the ventilation gallery be decommissioned.
5. Movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

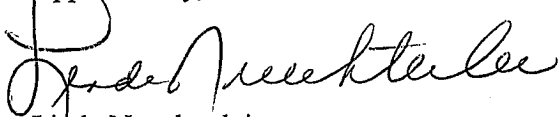
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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 the ADEC project manager, 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*

ARRC agrees to the terms of this Corrective Action Complete determination as stated in this Closure Decision Document dated January 28, 2010 for the ARRC - Broad Pass Railroad Station. 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).



Signature of Susan Schrader or Authorized Representative, Title
ARRC



Printed Name of Susan Schrader or Authorized Representative, Title
ARRC

RECEIVED**FEB 02 2010****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 at the address on this correspondence within 30 days of receipt of this letter.

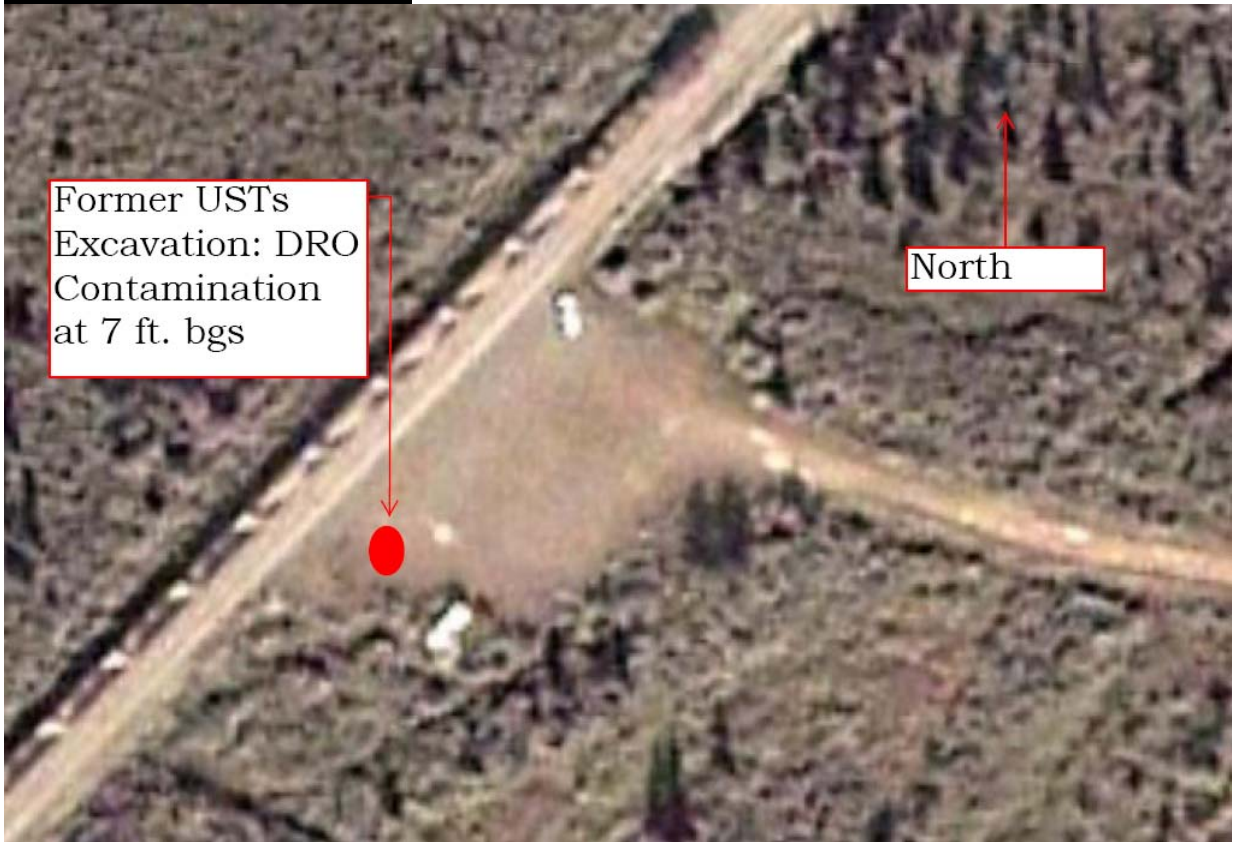
ADEC File:# **15026036**
Hazard ID: 22938
ADEC Project Manager: Grant Lidren

For Internal Use Only

*Attention ADEC Administration Staff: Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

Attachment B: Site Figure



Former USTs
Excavation: DRO
Contamination
at 7 ft. bgs

North

Google Earth Pro Image 2009