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DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

File: 102.38.064

June 1, 2010

Jim Little
Fairbanks Memorial Hospital (FMH)
1919 Lathrop Street Suite 216
Fairbanks, Alaska 99701

Re: Decision Document; AHFC Properties-1623 22nd Avenue
Cleanup Complete- Institutional Controls

Dear Mr. Little:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the AHFC Properties-1623 22nd Avenue site located in Fairbanks, Alaska. 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 AHFC Properties-1623 22nd Avenue, 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:
AHFC Properties-1623 22nd Avenue
1623 22nd Avenue
Fairbanks, Alaska 99701

Name and Mailing Address of Contact Party:
Jim Little
Fairbanks Memorial Hospital (FMH)
1919 Lathrop Street Suite 216
Fairbanks, Alaska 99701

ADEC Site Identifiers:
ADEC Reckey: 1994310122402

File: # 102.38.064
Hazard ID: 2315

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

Background
Petroleum impacted soil was encountered during the removal of a 3,000 gallon underground heating oil tank (HOT) in 1994. Petroleum impacts to soil are attributed to spills and overfill at the tank.

Contaminants of Concern
During the investigations at this site, soil samples were analyzed for the following: diesel range organics (DRO); 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*.

Contaminant	Migration to Groundwater Cleanup Level (mg/kg)
Diesel range organics (DRO)	250

Site Characterization and Cleanup Actions
In 1994, 36 cubic yards of contaminated soil were removed during the excavation of the 3,000 gallon HOT and thermally remediated. Four confirmation samples collected at the groundwater interface, 7.5 to 9.5 feet below ground surface (bgs) contained diesel range organics (DRO) up to 1,770.4 mg/kg. Groundwater at the base of the excavation contained a visible sheen.

In 2009, two groundwater samples collected from a temporary monitoring well at the former 3,000 gallon HOT contained detectable concentrations of contaminants, but concentrations were below ADEC cleanup levels. Groundwater was encountered at 10 feet bgs.

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 removal action served to remove contaminated surface soil.
Sub-Surface Soil Contact	De Minimis Exposure	The removal action served to remove the majority of contaminated soil, and any remaining contaminant concentrations in the subsurface are below direct contact cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and no other volatile compounds are present. Therefore this pathway is considered incomplete.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and no other volatile compounds are present. Therefore this pathway is considered incomplete.
Groundwater Ingestion	De Minimis Exposure	Groundwater samples collected from a temporary well contained detectable concentrations of contaminants, but below ADEC Table C cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Source areas are located more than 100 feet from surface water. 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. This area is not used for harvesting wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at this site.

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 AHFC Properties- 1623 22nd Avenue, but ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup 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, FMC will report to ADEC every five years to document land use, or as soon as the FMC 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. 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 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.

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

cc: Kim Coy, Risk Management, Administrative Services Manager, AHFC

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

FMC agrees to the terms of this Cleanup Complete determination as stated in this Closure Decision Document dated **June 1, 2010** for the AHFC Properties-1623 22nd Avenue. 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 75.380(d).

_____

Signature of Jim Little or Authorized Representative, Title
FMC

_____

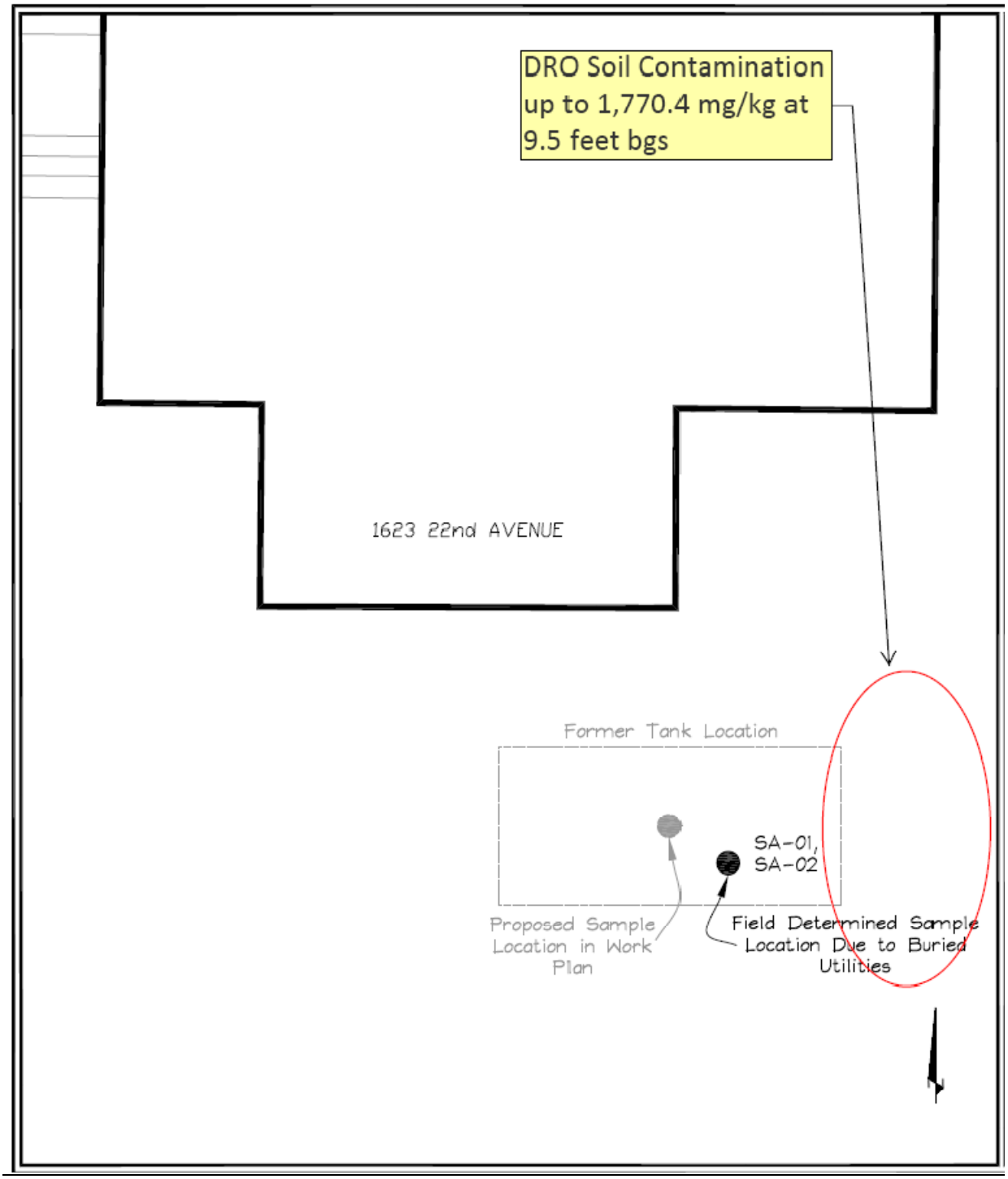
Printed Name of Jim Little or Authorized Representative, Title
FMC

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:#	102.38.064
Hazard ID:	2315
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