

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) 269-7551
FAX: (907) 269-7507
www.dec.state.ak.us

File: 2100.38.398
Certified Return Receipt
Article No: 7008 1830 0002 6349 4524

June 3, 2010

Ms. Edie Knapp
Anchorage School District
Facilities Department
1301 Labar Street
Anchorage, Alaska 99519

Re: Decision Document; ASD Nunaka Valley Elementary School
Cleanup Complete Determination-Institutional Controls

Dear Ms. Knapp:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the ASD Nunaka Valley Elementary School located at 1905 Twining Drive Anchorage, Alaska. Based on the information provided to date, it has been 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 ASD Nunaka Valley Elementary School 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 ICs determination.

Introduction

Site Name and Location:

ASD Nunaka Valley Elementary School
1905 Twining Drive
Anchorage, Alaska 99504

Name and Mailing Address of Contact Party:

Edie Knapp
Anchorage School District, Facilities Department
1301 Labar Street
Anchorage, Alaska 99519

ADEC Site Identifiers

ADEC Reckey: 1998210117601

File: 2100.38.398

Hazard ID: 3001

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Soil contamination at the site is attributed to spills and leaks from two unregulated underground storage tanks used to store diesel fuel. The tanks were removed from a common excavation in 1998.

Site Characterization and Cleanup Actions

During removal of the tanks in 1998, approximately one hundred and forty cubic yards of soil were excavated, stockpiled, and sampled. Based on sample results, approximately 10 cubic yards of soil were found to contain DRO concentrations above the cleanup level and the soil was treated at Alaska Soil Recycling.

Confirmation soil samples collected after the tanks had been removed contained DRO up to 2,790 mg/kg in a sample collected at 13 feet below ground surface. In an effort to remediate the remaining contaminated soil, a passive bioventing system with a wind-driven turbine was installed in 1998 and allowed to operate until approximately 2006, when it was discovered that the turbine was no longer attached to the riser pipe. In 1999 an addition to the school was built partially on top of the former tank area making further excavation unfeasible. In May 2010 the riser pipe of the passive bioventing system was removed after tests showed there were no volatile organics remaining.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for diesel range organics (DRO), gasoline range organics (GRO), volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX); and residual range organics (RRO). 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, Table B2 Under 40 inch Zone, Migration to Groundwater (MTG).

<u>Contaminant</u>	<u>MTG Cleanup Level, mg/kg</u>
• Diesel Range Organics	250

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.

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contaminated soil is not located at the surface.
Sub-Surface Soil Contact	De Minimis	The remaining subsurface soil contamination is covered with clean fill and is not accessible to receptors and is considered De Minimis in volume.
Inhalation – Outdoor Air	De Minimis	The remaining contamination is below inhalation cleanup levels and is covered with clean fill which mitigates exposure via this pathway.
Inhalation – Indoor Air (vapor intrusion)	De Minimis	The remaining contamination is below inhalation cleanup levels and is covered with clean fill which mitigates exposure via this pathway.
Groundwater Ingestion	Pathway Incomplete	The homes around the school use municipal water sources so groundwater is not a drinking water source.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	The site is in a well developed urban area that is not utilized for the collection of wild foods
Exposure to Ecological Receptors	Pathway Incomplete	The remaining contaminated soil is below the surface and is not available to ecological receptors.

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

Contamination remains on site above established default cleanup levels, however ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be issued a Cleanup Complete- ICs 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 ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Anchorage School District shall report to ADEC every five years to document land use, or report as soon as the Anchorage School District becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.**
2. 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.)
3. Soil contamination is located under the building addition. When the building is removed and/or the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, Institutional Controls will be terminated.


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.

Please sign and return *Attachment A* to ADEC within 30 days of receipt of this letter. If you have questions about this closure decision, please contact the ADEC project manager, Pam Clemens at (907) 269-7551

Approved By,



Linda Nuechterlein
Environmental Manager

Recommended By



Pam Clemens
Environmental Program Specialist

Attachment A: Cleanup Complete-ICs Agreement Signature Page

Attachment B: Site Figure

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

The Anchorage School District agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision document dated **June 3, 2010** for the ASD Nunaka Valley Elementary School, Hazard ID: 3001. 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.

Signature of Authorized Representative, Title

Edie Knapp, P.E., Program Manager, Division of Facilities and Operations, Anchorage School District

Edie Knapp

Printed Name of Authorized Representative, Title

Edie Knapp, P.E., Program Manager, Division of Facilities and Operations, Anchorage School District

***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, Pam Clemens, at the address on this correspondence within 30 days of receipt of this letter.

ADEC File No.	2100.38.398
Hazard ID:	3001
ADEC Project Manager:	Pam Clemens

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

