# STATE OF ALASKA

**DEPT. OF ENVIRONMENTAL CONSERVATION**

**DIVISION OF SPILL PREVENTION AND RESPONSE**
**CONTAMINATED SITES PROGRAM**

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File: # 2100.38.515
Return Receipt Requested
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June 28, 2010

Leland Jeffs Administrative Trust
c/o Lisa Monsen, Co-Trustee
12801 Wellsford Circle
Anchorage, AK 99516

Re: Decision Document; Former Alaska Plumbing and Heating Wholesale
Cleanup Complete Determination

Dear Ms. Monsen:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Former Alaska Plumbing and Heating Wholesale located at 2132 North Post Road in 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 this site will be closed.

This decision is based on the administrative record for Former Alaska Plumbing and Heating Wholesale, 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 determination.

**Introduction**

Site Name and Location
Former Alaska Plumbing and Heating Wholesale
2132 North Post Road
Anchorage, AK

Name and Mailing Address of Contact Party:
Leland Jeffs Administrative Trust
c/o Lisa Monsen, Co-Trustee
12801 Wellsford Circle
Anchorage, AK 99516

ADEC Site Identifiers:
Hazard ID #25496
CS file # 2100.38.515

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

**Background**
Several potential contaminant source areas were identified at this site during a 2009 Phase I Environmental Site Assessment including two drywells, areas of stained soil, and several piles of sandblasting sediment. The subject property was also the site of a UST removal in 2004 resulting in a Cleanup Complete Determination issued by ADEC for Hazard ID 25358.

**Contaminants of Concern**
During the various investigations at this site, soil samples were analyzed for diesel range organics (DRO), residual range organics (RRO), gasoline range organics (GRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), metals, volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs). Based on the results of these investigations, the following contaminant of concern was identified:

- 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.

| Contaminant | Site Cleanup Level (mg/kg) |
|---|---|
| • DRO | 250 |

**Site Characterization and Cleanup**
The Phase I investigation conducted at this site in August 2009 identified several potential source areas including the Northern Warehouse Drywell, the Northern Canopy Dry Well, several areas of stained soil, and several piles of sandblasting sediment. These areas were addressed during the Phase II activities conducted in October 2009.

At the Northern Warehouse Drywell, a borehole was advanced in the drywell after the remaining sludge had been removed. Soil samples were screened in the field using a PID and the sample from 7-9 feet below ground surface (bgs), just above the groundwater interface, was submitted for laboratory analyses. DRO was detected at 2,590 mg/kg. Two additional borings were advanced immediately downgradient from the dry well to evaluate the extent of contamination. Soil samples collected from these borings did not contain contaminants above cleanup levels, indicating the impacts from the drywell are limited to the area immediately beneath the drywell.

At the Northern Canopy Drywell, one borehole was advanced immediately downgradient and soil samples were collected for laboratory analyses. Soil samples did not contain contaminants above cleanup levels.

During August 2009, various areas of stained soil identified during the initial Phase I Assessment were excavated, placed into drums, and treated at Anchorage Soil Recycling (ASR). Confirmation samples collected from the excavated areas indicated DRO contamination remained at concentrations above cleanup levels in some locations, subsequently identified as Areas A, B, and C.

Further excavation was performed to remove any contamination identified to be above cleanup levels in Areas A, B and C. At Area A, located south of the Northern Warehouse, soil was excavated to a depth of 2 feet below ground surface (bgs) over an area of approximately 357 square feet. Confirmation samples collected from the bottom and sidewalls of the excavation did not contain contaminants above cleanup levels. At Area B, located east of the southern warehouse, soil was excavated to a depth of 4 feet bgs over an area of approximately 646 square feet. DRO was detected in one confirmation sample from Area B at 548 mg/kg. At Area C, located in the southeastern corner of the property, soil was excavated to a depth of 2 feet bgs over an area of approximately 288 square feet. Confirmation samples collected from the bottom and sidewalls of the excavation did not contain contaminants above cleanup levels. Excavated soil was transported to ASR for treatment.

Several piles of sand blasting sediment were found on the property including one large pile in the southwestern corner of the site. Composite waste characterization samples were collected from the various piles of sediment and analyzed for metals. The primary metals of concern were barium (detected up to 3,840 mg/kg), and chromium which was detected up to 93.7 mg/kg. Samples submitted for Toxicity Characteristic Leaching Procedure (TCLP) did not detect concentrations above hazardous waste criteria, so the sand blasting sediment was excavated from the property and disposed of at the Anchorage Regional Landfill. Confirmation samples collected beneath the former piles did not contain metals above cleanup levels except for arsenic and chromium.

Arsenic and chromium were detected in several soil samples from varying depths at concentrations above DEC cleanup levels. However these concentrations are considered representative of background conditions at the site and not the result of site contamination.

Groundwater at the site was evaluated as part of the Remedial Investigation conducted by the Alaska Railroad Corporation in 2006. Monitoring well MW15 installed down-gradient of the drywells did not contain detectable concentrations of contaminants.

The two drywells at the site were considered underground injection control (UIC) wells by the Environmental Protection Agency (EPA) UIC program. In June 2010 both drywells were closed in accordance with an EPA approved UIC well closure work plan.

**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 |
|---|---|---|
| Direct Contact with Surface Soil | Pathway Incomplete | Contaminated material is no longer located at the surface |
| Direct Contact with Sub-Surface Soil | De Minimis Exposure | The contaminated soil remaining in the subsurface is de minimis in nature and extent |
| Inhalation – Indoor Air (vapor intrusion) | De Minimis Exposure | Volatile contaminants are not present at concentrations that could cause a risk via this pathway, so exposure is considered De Minimis. |
| Inhalation -Outdoor Air | De Minimis Exposure | Volatile contaminants are not present at concentrations that could cause a risk via this pathway, so exposure is considered De Minimis. |
| Groundwater Ingestion | Pathway Incomplete | Groundwater has not been impacted by contamination at the site, and is not used as a drinking water source in this area. |
| Surface Water Ingestion | Pathway Incomplete | Surface water in the area is not used for drinking water purposes. |
| Wild Foods Ingestion | Pathway Incomplete | Wild foods are not harvested in this area. |
| Exposure to Ecological Receptors | Pathway Incomplete | No complete pathways to ecological receptors are present at the 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**

The cleanup actions to date have served to excavate and adequately remove contaminated soil from the site. Based on the information available, ADEC has determined no further assessment

or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Cleanup Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75.325(i). 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 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 ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,

Linda Nuechterlein
Environmental Manager

Recommended By,

William O'Connell
Environmental Program Specialist

CC: Susan Schrader, ARRC