STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

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File: 2540.38.013

Return Receipt Requested
Article No. 1008 1830 0002 6349 4609

June 23, 2010

Ginger Baim, Director
SAFE Women's Shelter
P.O. Box 94
Dillingham, Alaska 99576-0094

Re: Decision Document; SAFE Women's Shelter
Cleanup Complete Determination – Institutional Controls

Dear Ms. Baim:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the SAFE Women's Shelter located at 21 G Street West, Dillingham, AK. 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 (ICs).

This decision is based on the administrative record for the SAFE Women's Shelter 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:
SAFE Women's Shelter
21 G Street West
Dillingham, Alaska 99576-0094

Name and Mailing Address of Contact Party:
Ginger Baim
SAFE Women's Shelter
P.O. Box 94
Dillingham, Alaska 99576-0094

Database Record Key and File Number:
ADEC Reckey: 2002250110101
File: 2540.38.013
Hazard ID: 3938

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

Background
This site has been impacted by leaks and spills from a 500-gallon #1 diesel heating oil aboveground storage tank. The Prevention and Emergency Response Program (PERP) provided oversight for the investigation and cleanup efforts, and transferred the site to the Contaminated Sites Program (CSP) for review and evaluation due to presence of residual contamination.

Contaminants of Concern
During the course of investigation and cleanup at this site, groundwater samples were collected from the drinking water wells adjacent to this site. The samples were analyzed for: diesel range organics (DRO); benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these data and knowledge of the source of contamination, the following contaminant of concern was identified:

- Diesel Range Organics (DRO)

Cleanup Levels
The groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

Contaminant	Site Cleanup Level (mg/L)
• Diesel Range Organics	1.5

Site Characterization and Cleanup Actions
The following information was reported to the CSP when the site was transferred from PERP. In April 2002, approximately 380 gallons of #1 diesel heating oil were spilled from a 500-gallon aboveground storage tank. The cause of the spill was a ruptured fuel line. Approximately four and one half cubic yards of contaminated soil were excavated. However the excavation was limited by the foundation of the building and confirmation samples were not collected. The excavated soil was stored on-site on a liner, in a bermed containment cell from April 2002 to August 2002. During that time the soil was tilled weekly to facilitate remediation.

Groundwater monitoring occurred in September 2002 when the two drinking water wells adjacent to this site were tested for DRO and benzene, toluene, ethylbenzene, and xylenes (BTEX). No contamination was detected above the laboratory's practical quantification limits. The nearest potable water well is located approximately 200 feet cross gradient of this site and

there are no drinking water wells downgradient of this site. All downgradient homes are served by city water and sewer.

In August 2002 the soil was moved to impermeable fish totes where it was aerated monthly through August 2004. In August 2004, approval was granted to use the soil as a base layer for the driveway, which was then capped with asphalt.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants were 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	De Minimis Exposure	It was reported that stained surface soil was removed during the excavation. Clean fill was used to restore the grade.
Sub-Surface Soil Contact	De Minimis Exposure	Any remaining subsurface soil contamination was covered with clean fill and is not accessible to receptors. The treated soils are under an asphalt cap and are not accessible to receptors.
Inhalation – Outdoor Air	De Minimis Exposure	Any remaining contamination is covered with clean fill or asphalt; and the remaining risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	Any remaining contamination is covered with clean fill or asphalt; and the remaining risk via this pathway is considered insignificant.
Groundwater Ingestion	Pathway Incomplete	No groundwater was encountered during the excavation. Furthermore, homes downgradient of this site use city water. The cross gradient drinking water wells were tested and no contamination was detected.
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	Any 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
The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted 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 SAFE Women's Shelter shall report to ADEC every five years to document land use, or report as soon as SAFE Women's Shelter 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 attachment B Site Figure)

3. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

4. Future installation of groundwater wells will require approval from ADEC.

5. 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.

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, then the 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**

SAFE Women's Shelter agrees to the terms of this Cleanup Complete with Institutional Controls determination as stated in this Closure Decision Document dated **June 23, 2010** for the SAFE Women's Shelter, Hazard ID: 3938. 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 Authorized Representative, Title
Ginger Baim, Director, SAFE Women's Shelter

Ginger Baim
Printed Name of Authorized Representative, Title
Ginger Baim, Director, SAFE Women's Shelter

***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. 2540.38.013
Hazard ID: 3938
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

SAFE WOMEN'S SHELTER

21 G Street West
Dillingham, Alaska