STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

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File: 2100.26.311 Certified Return Receipt Article No: 7007 3020 0000 1948 3440

September 24, 2010

Mark Corsentino
Project Management Supervisor
Anchorage Water & Wastewater Utility (AWWU)
3000 Arctic Boulevard
Anchorage, AK 99503

Re: Closure Decision Document; MOA-AWWU - Operations Facility (1992 Tank Removals)
Corrective Action Complete Determination

Dear Mr. Corsentino:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the MOA - AWWU - Operations Facility (1992 Tank Removals) site. 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 this site will be closed.

This decision is based on the administrative record which is located in the offices of the Alaska Department of Environmental Conservation 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 this Corrective Action Complete Determination.

Introduction

Site Name and Location:
MOA - AWWU - Operations Facility (1992 Tank Removals)
325 E. 95th Court
Anchorage, AK 99515

Name and Mailing Address of Contact Party:
Mark Corsentino
Project Management Supervisor
Anchorage Water & Wastewater Utility (AWWU)
3000 Arctic Boulevard
Anchorage, AK 99503

ADEC Site Identifiers

File#: 2100.26.311 Hazard ID: 23970

Regulatory authority under which the site is being cleaned up:

18 AAC 78 18 AAC 75

Background

In 1992, petroleum impacted soil was encountered during the removal of a regulated 2,000 gallon diesel underground storage tank (UST); a regulated 2,000 gallon gasoline UST; and their associated piping systems. Groundwater was encountered at approximately eight feet below ground surface (bgs).

Contaminants of Concern

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

- GRO
- DRO
- BTEX

However, no COCs remain on site above ADEC's most stringent soil cleanup levels established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater (MTG) *Under 40 Inch Zone*.

Characterization Activities

Confirmation soil samples from the limits of the tank excavations contained DRO up to 30.2 mg/kg; toluene up to 0.070 mg/kg; xylenes up to 0.156 mg/kg; and lead up to 9.8 mg/kg. Confirmation soil samples collected did not contain any contaminants above the most stringent ADEC "migration to groundwater" cleanup levels. Groundwater was encountered at approximately eight feet bgs. One groundwater sample was analyzed for the BTEX constituents, and none were detected.

Following the UST removals in 1992, approximately 183.68 tons of petroleum contaminated soil were excavated, transported, and thermally treated at Alaska Soil Recycling (ASR). The excavations were brought back to grade with clean fill.

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 Tracking Model Results

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	The contaminated surface soil was removed during the initial excavation.

Sub-Surface Soil Contact	De-Minimis Exposure	Sub-surface soil confirmation samples collected were below the most stringent cleanup levels and are considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation – Outdoor Air	De-Minimis Exposure	The volatile organic compounds detected in the confirmation samples were below the most stringent cleanup levels and are considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	The volatile organic compounds detected in the confirmation samples were below the most stringent cleanup levels and are considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	Pathway Incomplete	Once groundwater sample was analyzed for BTEX and there was no detection; therefore this pathway is incomplete.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	This area is not used for harvesting wild foods.
Exposure to Ecological Receptors	De-Minimis Exposure	Lead detected in the confirmation samples was below the most stringent cleanup leveland is considered De- Minimis in volume. Therefore risk via this pathway is considered insignificant

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 adequately address petroleum contaminated soil from the site. Based on the information available, ADEC has determined no further assessment and/or cleanup action is required. There is no unacceptable risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.600(h) and 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 closure 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.

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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 decision document, please contact the ADEC Project Manager, Robert Weimer at (907) 269-7525.

Approved By,

Linda Nuechterlein Environmental Manager Recommended By,

Robert Weimer

Environmental Specialist