

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2100.26.310
Certified Return Receipt
Article No: 7007 3020 0000 1948 3433

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 - Point Woronzof (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 - Point Woronzof 1992 tank removals of a regulated 500 gallon used oil underground storage tank (UST), and two regulated 5,000 gallon gasoline USTs, a dispenser island, and the associated piping systems. 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 for the MOA - AWWU - Point Woronzof (1992 Tank Removals), 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 - Point Woronzof (1992 Tank Removals)
Hudson Road
Anchorage, AK 99502

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#: 2100.26.310

Hazard ID: 23927

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 500 gallon used oil Underground Storage Tank (UST); two regulated 5,000 gallon gasoline USTs; a dispenser island; and associated piping systems.

Contaminants of Concern

During the investigation at this site, soil samples were analyzed for the following: arsenic; chromium; lead; polychlorinated biphenyls (PCBs); diesel range organics (DRO); gasoline range organics (GRO); residual range organics (RRO); 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
- RRO
- 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 samples collected 10 feet below ground surface (bgs) from the limits of the excavation of the two gasoline USTs did not detect any analytes except lead, which was found up to 4.7 mg/kg. Confirmation samples from the limits of the fuel dispenser area excavation at 9 feet bgs did not detect any analytes except lead which was found up to 6.1 mg/kg.

Confirmation samples from the limits of the excavation of the used oil UST at 9 feet bgs contained GRO up to 0.765 mg/kg; RRO up to 66.5 mg/kg; arsenic up to 6.1 mg/kg; chromium up to 19.6 mg/kg and lead up to 4.3 mg/kg. PCBs, DRO, and BTEX were not detected in the confirmation samples of the used oil UST. Confirmation soil samples collected did not contain any contaminants above ADEC's most stringent "migration to groundwater" cleanup levels except for arsenic, which appears to be consistent with naturally occurring concentrations for that area.

Following the UST removals in 1992, approximately 374.29 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 samples collected were below the most stringent cleanup levels except for arsenic which appears to be consistent with naturally occurring concentrations for that area, and are considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation – Outdoor Air	Pathway Incomplete	There were no volatile organic compounds detected in the confirmation samples.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There were no volatile organic compounds detected in the confirmation samples.
Groundwater Ingestion	Pathway Incomplete	Confirmation soil samples collected were below migration to groundwater cleanup levels. Therefore this pathway is considered 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 samples collected were below the most stringent cleanup levels and are 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.

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 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