STATE OF ALASKA

DEPARTMENT OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

610 University Avenue Fairbanks, AK 99709-3643 PHONE: (907) 451-2127 FAX: (907) 451-5105 www.dec.state.ak.us

File: 140.38.038

October 11, 2011

Robert Sackinger Alaska Department of Natural Resources 3700 Airport Way Fairbanks, AK 99709

Re: Decision Document; ADNR Asphalt Drum Site

Cleanup Complete Determination

Dear Mr. Sackinger:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with ADNR Asphalt Drum Site located at Mile 278 Richardson Highway, Alaska. 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 ADNR Asphalt Drum Site, which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Fairbanks, 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:
ADNR Asphalt Drum Site
Mile 278
Richardson Highway, Alaska

Name and Mailing Address of Contact Party: Robert Sackinger Alaska Department of Natural Resources 3700 Airport Way Fairbanks, AK 99709 Database Record Key and File Number:

ADEC Reckey: 1990330115201

File: 140.38.038 Hazard ID: 1156

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

ADEC visited this site in 1990 after receiving a public complaint of several drums leaking an unknown liquid. Sixteen drums were found to be leaking liquid asphalt. A second site visit in 1998 confirmed the presence of 22 corroded drums and stained surrounding soil in three areas: the 18 drum cache area, the solvent drum area, and the 3 drum area. This site is located on Alaska Department of Natural Resources (ADNR) land.

Soil samples collected at this site have been tested for: diesel range organics (DRO); residual range organics (GRO); volatile organic compounds (VOCs); and semi-volatile organic compounds (SVOCs).

Characterization and Cleanup Activities

DEC contracted Shannon and Wilson, Inc. to perform site characterization and removal and disposal of the leaking drums. Twenty-two drums were removed from the site in 2008. Approximately 700 gallons of asphalt-contaminated soil were removed from the site by Emerald Alaska, Inc. in 2010.

Soil samples were collected from the two most contaminated areas and tested for DRO, RRO, VOC, and SVOC analysis. DRO was detected up to 226 mg/kg and RRO was detected up to 1,470 mg/kg, both under migration to groundwater cleanup levels. No VOCs or SVOCs were detected.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for diesel range organics (DRO); residual range organics (RRO); volatile organic compounds (VOCs); and semi-volatile organic compounds (SVOCs). Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Diesel Range Organics (DRO)
- Residual Range Organics (RRO)

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
DRO	250
RRO	11,000

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	De- minimis exposure	Drums and asphalt-contaminated soil have been removed and disposed of offsite. DRO and RRO are present below
Sub-Surface Soil Contact	Pathway Incomplete	direct contact/ingestion cleanup levels. Contamination was not found in the subsurface.
Inhalation – Outdoor Air	Pathway Incomplete	DRO and RRO contamination remaining is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings and no VOCs or SVOCs were detected at the site.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered during the investigation. Remaining contamination is below migration to groundwater cleanup levels.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	There is no surface or subsurface contamination remaining above migration to groundwater levels.
Exposure to Ecological Receptors	Pathway Incomplete	There is no surface or subsurface contamination remaining above migration to groundwater levels.

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 the ADEC project manager, Janice Wiegers at (907) 451-2127.

Approved By,

W Rich Sundet

Environmental Program Manager

Sincerely,

Janice Wiegers

Environmental Program Specialist