

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM**

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File No: 2100.38.523
Return Receipt Requested
Article No: 7010 2780 0000 2089 6521

February 2, 2012

Micaela Jones, Providence Health & Services Alaska
Regional Director of Real Estate & Development
3760 Piper Street, Suite 3036
Anchorage, Alaska 99508

Re: Decision Document; Former Mobile Home Park - 1001 Boniface Parkway
Cleanup Complete- Institutional Controls

Dear Ms. Jones:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the Former Mobile Home Park - 1001 Boniface Parkway. Based on the information provided to date and the administrative record, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment. No further remedial action will be required as long as the site is in compliance with established institutional controls.

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 – Institutional Controls Determination.

Introduction

Site Name and Location:

Former Mobile Home Park - 1001 Boniface Parkway
945 Compassion Circle
Anchorage, Alaska 99508

Name and Mailing Address of Contact Party:

Micaela Jones, Providence Health & Services Alaska
Regional Director of Real Estate & Development
3760 Piper Street, Suite 3036
Anchorage, Alaska 99508

ADEC Site Identifiers:

File: # 2100.38.523

Hazard ID: 25635

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Petroleum impacted soil was encountered at a former trailer park during a limited Phase II site assessment in 2010. The trailer park operated from 1966 to 2001. The contamination source is unknown, but potential sources include: an office/maintenance facility shop, former above ground storage tanks and associated underground piping. Reportedly, underground fuel lines and asbestos-containing water and sewer distribution lines remain on the west side of the 26.114 acre property.

This property is located in a mixed residential/ commercial area. Construction activities are currently in progress at the site for the Providence Alaska Cottage Project.

Contaminants of Concern

During the investigations at this site, groundwater and soil samples were analyzed for the following: gasoline range organics (GRO); diesel range organics (DRO); residual range organics (RRO); polychlorinated biphenyls (PCBs); metals; and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminants of Concern (COCs) were identified:

- DRO
- GRO
- 1,2,4-trimethylbenzene
- 1,3,5-trimethylbenzene

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B1 and B2, Migration to Groundwater (MTG), *Under 40 Inch Zone*.

<u>Contaminant</u>	<u>Direct Contact & MTG Site Cleanup Level (mg/kg)</u>
DRO	250
GRO	300
1,2,4-trimethylbenzene	23
1,3,5-trimethylbenzene	23

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

<u>Contaminant</u>	<u>MGW Cleanup Level (mg/L)</u>
Diesel Range Organics	1.5

Site Characterization

Twenty seven test pits were excavated to 10 feet below ground surface (bgs) during the Phase II Investigation which was conducted in July 2010. Twenty soil samples were collected from these test pits based off screening results. Soil samples collected from test pit TP7, at a depth of 4 to 6 feet bgs contained DRO at 3,050 mg/kg; GRO at 474.4 mg/kg; 1,2,4-trimethylbenzene at 112 mg/kg; and 1,3,5-trimethylbenzene at 24.1 mg/kg. Soil samples collected from TP11, 6 to 8 feet bgs, contained DRO at 1,370 mg/kg. It should be noted that the detection limit for benzene exceeded the ADEC cleanup up level of 0.025 mg/kg for the soil samples associated with TP7, TP11, and TP20.

In May 2011, a total of 14 soil borings were advanced in the vicinity of TP7 and TP11 to further delineate the extent of contamination for DRO, GRO and 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene. Eight soil borings advanced around TP11 contained DRO up to 1,100 mg/kg at 3 to 4 feet bgs. Soil samples collected below this depth contained detectable levels of contaminants, but were below the most conservative migration to groundwater (MTG) cleanup levels. However, six soil borings advanced around TP7 at depths of 2 to 8 ft. contained DRO up to 1,070 mg/kg at the 6 to 8 foot interval.

In September 2011, a soil boring was advanced at TP7 to further delineate the vertical extent of contamination since this was not accomplished during the May 2011 effort. Two soil samples collected from 8 to 14.5 feet bgs at the groundwater interface, contained detectable levels of contaminants of concern, but were well below MTG cleanup levels. This completed the delineation of TP7.

One groundwater sample collected from a temporary monitoring well contained DRO slightly above Table C cleanup levels at 1.53 mg/L. This result, which was collected from a temporary monitoring well, may be elevated due to suspended solids. The nearest drinking water well, WL002, is located 300 feet away (see attachment B). It is 237 feet bgs, screened at 155 feet bgs, with a static water level of 40 feet bgs. The well log for WL002 states a "Clay: hard, gravelly" layer was encountered at 85 to 112 feet bgs indicating the aquifer is confined. WL002 was sampled in 2010 and did not contain VOCs. This Class C well is regulated by the drinking water program and is scheduled to be sampled again by 2013. Furthermore, the Providence Alaska Cottage currently being constructed on site is on the municipal water system

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	Surface soil samples were not collected. However, sub-surface soil samples were below direct contact cleanup levels and de minimis in volume. Therefore risk via this pathway is considered insignificant..
Sub-Surface Soil Contact	De-minimis exposure	Sub-surface soil samples were below direct contact cleanup levels and de minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation – Outdoor Air	De-minimis exposure	Only one soil sample, collected at 4 feet bgs, contained 1,2,4-trimethylbenzene up to 112 mg/kg, which is above inhalation cleanup levels. The vertical and horizontal extent of this area was defined indicating de minimis in quantities. Therefore risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	Only one soil sample, collected at 4 feet bgs, contained 1,2,4-trimethylbenzene up to 112 mg/kg, which is above inhalation cleanup levels. The vertical and horizontal extent of this area was defined indicating de minimis in quantities. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	De-minimis exposure	One groundwater sample collected contained DRO slightly above Table C cleanup level); No other contaminants of concern exceeded Table C levels. The nearest drinking water well, WL002, is located 300 feet away; is 237 feet bgs; was sampled in 2010 and did not contain VOCs. The surrounding area is on the municipal water system. Therefore, current and future exposure to potential migration of contaminants to drinking water is considered de-minimis.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors 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

There is contamination remaining above the most stringent cleanup levels at the Former Mobile Home Park - 1001 Boniface Parkway (see attachment B), but ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be granted a Cleanup Complete- Institutional Controls 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 institutional controls may not be protective and ADEC may require additional remediation and/or institutional controls. Therefore, Providence will report to ADEC every five years to document land use, or as soon as Providence becomes aware of any change in land ownership and/or use. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov**
2. 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.
3. 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).
4. Movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.
5. Installation of groundwater or drinking water wells at this site will require approval from ADEC.

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, Grant Lidren at (907) 269-8685.

Approved By,

A handwritten signature in blue ink, appearing to read "Linda Nuechterlein".

Linda Nuechterlein
Environmental Manager

Recommended By,

A handwritten signature in blue ink, appearing to read "Grant Lidren".

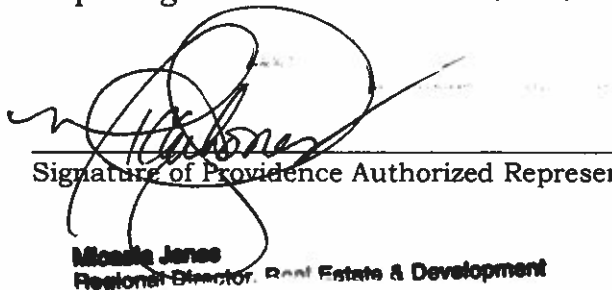
Grant Lidren
Environmental Specialist

Attachment A: Clean-Up Complete with IC's Signature Page

Attachment B: Site Figure

Attachment A: Cleanup Complete-ICs Agreement and Signature Page*

Providence agrees to the terms of this Cleanup Complete- Institutional Controls Determination as stated in this Closure Decision Document dated **February 2, 2012** for the Former Mobile Home Park - 1001 Boniface Parkway. 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 Providence Authorized Representative, Title

Micaela Jones
Regional Director, Real Estate & Development

Printed Name of Providence Authorized Representative, Title

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 at the address on this correspondence within 30 days of receipt of this letter.

ADEC File:#	2100.38.523
Hazard ID:	25635
ADEC Project Manager:	Grant Lidren

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