

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-3057
FAX: (907) 269-7649
www.dec.state.ak.us

File No: 2100.38.530
Return Receipt Requested
Article No: 7010 2780 0000 2089 6453

June 26, 2012

Ms. Edie Knapp
Anchorage School District
Facilities Department
1301 Labar Street
Anchorage, Alaska 99515

Re: Decision Document; ASD East High School Former Bonfire Site
Cleanup Complete Determination

Dear Ms. Knapp:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the ASD East High School Former Bonfire Site located on the west side of East High School at the corner of Bragaw and Northern Lights in Anchorage, Alaska. 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 this site will be closed.

This decision is based on the ASD East High School Former Bonfire Site project file 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 determination.

Introduction

Site Name and Location

ASD East High School Bonfire Site
Northern Lights at Bragaw
Anchorage, AK

Name and Mailing Address of Contact Party:

Ms. Edie Knapp
Anchorage School District
Facilities Department
1301 Labar Street
Anchorage, Alaska 99515

ADEC Site Identifiers:

Hazard ID #25885

CS file # 2100.38.530

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Petroleum contaminated soil was encountered during site grading and excavation activities in preparation for the construction of a new parking lot located along the west side of East High School. During June 2012 the contractor's excavation crew noted suspected contaminated soil based on visual and olfactory observations. No apparent source for the contamination was evident. Anecdotal evidence indicates the area was used for large bonfires that may have been started with diesel fuel pumped from a fuel truck onto combustible materials gathered for the bonfire. The impacted area is between two existing parking lots that will be joined by new asphalt in 2012.

Contaminants of Concern

During the investigation at this site soil samples were analyzed for the following: diesel range organics (DRO); residual range organics (RRO); gasoline range organics (GRO); and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on the results of this investigation, DRO was the only contaminant of concern identified.

Cleanup Levels

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

<u>Contaminant</u>	<u>MTG Cleanup Level (mg/kg)</u>
• DRO	250

Site Characterization and Cleanup

Petroleum contaminated soil was encountered at approximately three to four feet below ground surface (bgs) during construction of a new parking lot. Contaminated soil was then segregated and stockpiled separately from non-impacted soil pending analytical results. Soil samples collected from the contaminated area contained DRO up to 786 mg/kg. No other contaminants were detected above cleanup levels.

In an effort to delineate the extent of contamination, test pits were excavated in the area of contamination and on all four sides of the impacted area. The test pit in the area of contamination was excavated to a final depth of 7 to 8 feet bgs at which point no evidence of contamination was present. The soil sample from this interval did not contain detectable concentrations of contaminants. Soil samples were also collected from the 7 to 8 foot interval in each of the four other test pits. Contaminants were not detected in any of the test pit samples, nor was evidence of contamination noted during test pit excavation. The area of contamination was estimated at 12 feet by 40 feet. Groundwater was not encountered in any of the test pits.

Contaminated soil was segregated from clean soil resulting in a total of 52 cubic yards of potentially impacted soil which was approved for reuse as fill beneath the parking lot.

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
Direct Contact with Surface Soil	Pathway Incomplete	Contaminated soil is not located at the surface.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	Contamination in the subsurface is below ingestion/direct contact cleanup levels and capped by an asphalt parking lot.
Inhalation-Outdoor Air	De Minimis Exposure	The remaining contamination is below inhalation cleanup levels and covered by an asphalt parking lot.
Inhalation-Indoor Air	Pathway Incomplete	Buildings are not located within 30 feet of the contaminated area.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered, and is not utilized as a drinking water source in this area.
Surface Water Ingestion	Pathway Incomplete	Surface water is not utilized 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

Based on the information available, ADEC has determined no further assessment 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 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.

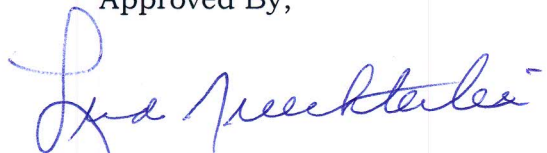
This determination is in accordance with 18 AAC 75.380(d) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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.

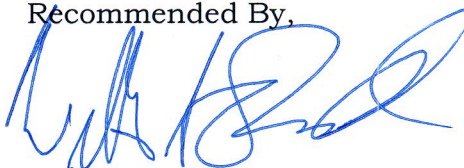
If you have questions about this closure decision, please contact ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,



Linda Nuechterlein
Environmental Program Manager

Recommended By,



William O'Connell
Environmental Program Specialist