STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

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

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June 28, 2012

Mr. John R. Faunce
UAA Facilities Planning and Construction
3890 University Lake Drive
Anchorage, AK 99508-4669

Re: Decision Document; Prince William Sound (PWS) Community College
Cleanup Complete Determination

Dear Mr. Faunce:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the PWS Community College in Valdez, 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 PWS Community College 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
PWS Community College
Valdez, AK

Name and Mailing Address of Contact Party:
Mr. John R. Faunce
UAA Facilities Planning and Construction
3890 University Lake Drive
Anchorage, AK 99508-4669

ADEC Site Identifiers:
Hazard ID #484
CS file # 2264.38.011

Regulatory authority under which the site is being cleaned up:
18 AAC 75

Background
The Prince William Sound Community College is located in the coastal city of Valdez, Alaska on Port Valdez, an estuary off Valdez Arm in Prince William Sound. Soil contamination was first noted at the site during excavation for a new water line in 1988 along the north side of the Community College Building. Subsequent investigations found that several underground heating oil tanks had leaked over the years contributing to soil contamination at the site. The College and surrounding residences are served by the Valdez Public Water System, and there are no wells downgradient of the source area. Water samples collected from the public water system in 2011 did not contain detectable concentrations of contaminants.

Contaminants of Concern
During the various investigations at this site, soil samples were analyzed for diesel range organics (DRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on the results of these investigations, DRO was the only contaminant of concern was identified.

Cleanup Levels
The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2, Over 40 Inch Zone, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
• DRO	230

Site Characterization and Cleanup
Site characterization was initially conducted in 1988 following the discovery of petroleum contamination during trenching for a new water line. Test pits were excavated to 8 to 12 feet below ground surface (bgs). Soil samples were collected and analyzed for total petroleum hydrocarbons (TPH) and BTEX. TPH was detected up to 1,800 mg/kg at approximately 4 feet bgs. BTEX was not detected. The deepest sample from approximately 12 feet bgs contained TPH at 231 mg/kg.

Additional investigation and cleanup was conducted in 1995 during the excavation of an underground heating oil tank installed in 1994 that was found to be leaking. Following excavation of this tank, another 1,500-gallon heating oil tank was discovered in the same area. Excavation of the tanks and contaminated soil progressed in stages to 25 feet bgs where groundwater was encountered. Approximately 800 cubic yards of contaminated soil was excavated and placed in a lined treatment cell near the west side of the college building. Confirmation samples collected from the excavation contained DRO up to 2,576 mg/kg. Some contaminated soil was left in place adjacent to the building foundation where further removal could not be safely conducted. The excavated soil in the treatment cell was eventually utilized in a Valdez road project with ADEC approval.

A large diameter monitoring well was placed into the excavation as it was backfilled and set to a depth of 25 feet bgs. The well was checked for water from 2006 until 2010, and was dry on each occasion except in 2008 when the sample collected was lost en route to the lab. Subsequently the well was dry when attempts were made to collect additional samples. In 2012 the well was decommissioned by the college.

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 direct contact cleanup levels and de minimis in volume; therefore risk via this pathway is considered insignificant.
Inhalation-Outdoor Air	De Minimis Exposure	The remaining contamination is below inhalation cleanup levels and de minimis in volume; therefore risk via this pathway is considered insignificant.
Inhalation-Indoor Air	Pathway Incomplete	Volatile contaminants are not present and semi-volatile contaminants are present in de minimis quantities
Groundwater Ingestion	De Minimis Exposure	Groundwater 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 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 ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,

Linda Nuechterlein
Environmental Manager

Recommended By,

William O'Connell
Environmental Program Specialist