

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

410 Willoughby Ave. Suite 302
Box 111800 Juneau AK 99811
PHONE: (907) 465-5210
FAX: (907) 465-5218
www.dec.state.ak.us

File: 1525.26.019

June 29, 2012

Mr. Gene Prewitt
Prewitt Funeral Home
P.O. Box 107500
Sitka, Alaska 99835

Re: Decision Document; Prewitt Funeral Home
Corrective Action Complete Determination

Dear Mr. Prewitt,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with Prewitt Funeral Home located at 1004 Halibut Point Road in Sitka, Alaska. Based on the information provided to date, the DEC 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 Prewitt Funeral Home Contaminated Site administrative record, which is located in the offices of the DEC in Juneau, 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 Corrective Action Complete Determination.

Site Name and Location

Prewitt Funeral Home
1004 Halibut Point Road
Sitka, Alaska 99835
Lot 3 Prewitt Subdivision US 3303
Lot 4 US 3303 at 205 Kimsham

Address of Contact Party

Mr. Gene Prewitt
1004 Halibut Point Road
Sitka, Alaska 99835

DEC Site Identifiers

Reckey: 1998120020901
File: 1525.26.019
Hazard ID: 25074

Regulatory Authority for Determination

Title 18 Alaska Administrative Code 78

Site Background

The commercial property is located on the corner of Halibut Point Road and Kimsham Street in Sitka. The parking area and entrance face Halibut Point Road. On the other side of Halibut Point Road, the marine waters of Sitka Sound are within several hundred feet of the property and subsurface water is likely influenced by tidal changes and possibly saltwater intrusion. The City of Sitka provides drinking water and sewer to the site and the surrounding area consists of mixed residential and commercial land use.

The regulated underground storage tank (UST) was formerly located between the sidewalk on Kimsham Street and the entrance to two garages providing access to the rear of the commercial facility. The area between the structures spans 20 feet and all surfaces were covered in concrete. Concrete was removed from a five by eight foot area to access the tank. This area has remained without cover since the excavation.

Site Characterization

In July 1998, petroleum impacted soil was encountered during the closure-by-removal Site Assessment of a 1,000-gallon gasoline UST and the associated piping. The Site Assessment stated that groundwater was observed during the excavation but did not appear to be contaminated with fuel. Field screening tests identified a volume of fifteen cubic yards of soil contaminated with fuel from the UST system. A soil sample collected from the stockpile was analyzed for benzene, ethylbenzene, toluene, total xylenes (BTEX) and gasoline (GRO) range petroleum hydrocarbons. The sample had a GRO level of 1,300 mg/kg and a total BTEX level of 102.3 mg/kg. The excavated soil was stored between liners at a DEC approved site at 102 Burkhart Street in Sitka.

Four confirmation samples and a duplicate were collected from the excavation were sent for laboratory analysis for BTEX and GRO. The samples were collected from locations on the north and south walls and the floor of the excavation, which reached a depth of approximately seven feet below ground surface (bgs) and 18 inches below the bottom of the former tank. The highest level of GRO was in confirmation soil sample CL02 at 810 mg/kg. CL02 was collected from the south wall of the excavation at a depth of seven feet bgs under the sidewalk along Kimsham Street. The highest level of benzene was in sample CL01 at 0.140 mg/kg, at a depth of five feet bgs in the north sidewall.

The following table displays the highest levels detected in soil remaining at the site, the depth that the sample was taken, and the Method Two Migration to Groundwater (M2 MTG) soil cleanup levels that are applicable to this site. Levels in bold exceed cleanup levels and represent the contaminants of concern for the site.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
GRO	810	CL02 at 7 feet	260
Benzene	0.140	CL01 at 5 feet	0.025
Toluene	1.9	CL01 at 5 feet	6.5
Ethylbenzene	5.1	CL01 at 5 feet	6.9
Total Xylenes	55	CL02 at 7 feet	63

Corrective Action Site Activities

In October 1998, perforated piping was installed to a depth of seven feet near the garage doors at the former UST site to provide air the subsurface soil. A pressurized air sparging system and monitoring well were proposed in a Corrective Action Plan but DEC responded in a January 1999 letter that passive air exchange was more suitable for the level of remaining soil contamination and for conditions at the site.

During the October 1998 site activity, a soil sample was collected from the contaminated soil stockpile at the Burkhart Street property in Sitka and was submitted to a laboratory for GRO and BTEX analysis. DEC determined that the GRO level of 5.8 mg/kg and total BTEX level of less than 0.327mg/kg met the applicable soil cleanup criteria and in a January 1999 letter released the soil for unrestricted use.

In April 2012, Chilkat Environmental (CE) examined the former UST site and the surrounding area for an evaluation of the exposure pathways. The soil ventilation piping was field screened for volatile hydrocarbon compounds with a photoionization detector and the readings were negative. Due to the paved street, sidewalk, and concrete slab building characteristics and the low historical levels of contamination, CE determined that exposure pathways were either incomplete or de minimis and recommended closure of the site.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC'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 or Pathway Incomplete. A summary of this pathway evaluation is included in Attachment A to this letter.

Cumulative Health Risk Calculation

Pursuant to 18 AAC 75.325 (g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be calculated. With data currently available, the DEC has determined that petroleum compounds remaining

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at the referenced site following cleanup are in concentrations that do not present a cumulative risk to human health.

DEC Decision

The cleanup actions to date have served to excavate and adequately remove contaminated soil from the site. Based on the information available, DEC 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 Corrective Action Complete determination has been granted, DEC approval is required for off-site soil disposal in accordance with 18 AAC 78.600(h). 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 78.276(f) and does not preclude DEC 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 DEC project manager, Bruce Wanstall at (907) 465-5210.

Approved By,



Sally Schlichting
Environmental Manager

Recommended By



Bruce Wanstall
Environmental Program Specialist

CC: Elijah Donat, Chilkat Environmental, via email

Attachment A: Exposure Pathway Evaluation

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	The contaminated soil stockpile was transported to a local treatment facility for remediation and was later approved for unconditional use by the DEC. There is no soil contamination remaining at the site in concentrations above the direct contact cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Soil samples collected from subsurface soil after closure by removal of the leaking UST are below human health levels for the direct contact, inhalation and ingestion exposure pathways.
Inhalation – Outdoor Air	De-minimis exposure	The BTEX compounds detected in soil are below inhalation levels for the exposure pathway.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	The building is occupied during working hours only at the shop. Building characteristics indicate the pathway is incomplete and any remaining volatile compounds in the subsurface have likely weathered to a de minimis condition.
Groundwater Ingestion	De-minimis exposure	The City of Sitka provides drinking water to the site and to the area. Groundwater is not suitable and is not used as a source of drinking water in Sitka. Although no formal controls are in place to prevent its use in the future, the time since the release is sufficient for de minimis contamination remaining to have reached safe levels.
Surface Water Ingestion	Pathway Incomplete	Swan Lake is located within ¼ mile but is on the DEC list of impaired water bodies for urban debris and is unsuitable for use as a drinking water source.
Wild Foods Ingestion	Pathway Incomplete	There are no contaminants of concern with the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	The distance from the former UST site and the time since the release occurred are sufficient reason to conclude that the pathway to ecological receptors is incomplete.

Notes to Table 1: “De-minimis exposure” means that in DEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in DEC’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.