THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File No: 2100.38.490

August 3, 2012

Randy Vanderwood
ADOT&PF- Anchorage
Division of Maintenance and Operations
Anchorage, Alaska 99519

Re: Decision Document; ADOT&PF Former Napa Auto Car Care Center; Cleanup Complete Determination – Institutional Controls

Dear Mr. Vanderwood;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with ADOT&PF Former Napa Auto Car Care Center. 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 no further remedial action will be required.

This decision is based on environmental records and the ADOT&PF Former Napa Auto Car Care Center 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 – Institutional Controls determination.

Introduction

Site Name and Location:
ADOT&PF Former Napa Auto Car Care Center
211 Bragaw Street Anchorage, Alaska 99501
NW1/4, Section 15, Township 13N, Range 3W, Seward Meridian

Name and Mailing Address of Contact Party:
Randy Vanderwood
ADOT&PF- Anchorage
Division of Maintenance and Operations
Anchorage, Alaska 99519

ADEC Site Identifiers
File: 2100.38.490
Hazard ID: 4490

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

Background
The site is located at the intersection of the Glenn Highway and Bragaw Street. The site was formerly a Napa Auto Car Care Center and has a gentle slope to the south towards the North Fork of Chester Creek. The soils found at the site are fairly uniform and consist of sandy gravels with silt from 0 to 40 feet below ground surface (bgs). A confining layer consisting of clay and silt is located roughly 40 feet bgs. The depth to groundwater at the site is roughly 16 feet bgs and groundwater flows toward the south-southwest. Soil samples collected at this site have been tested for: diesel range organics (DRO); gasoline range organics (GRO), residual range organics (RRO), metals, polychlorinated biphenyls (PCBs), semivolatile organic compounds (SVOCs) and volatile organic compounds (VOCs).

Site Characterization and Cleanup Actions
In 2007, the Alaska Department of Transportation and Public Facilities (ADOT&PF) facilitated the decommissioning of the former Napa Auto Care Center Facility in order to construct the Glenn and Bragaw Interchange. During the demolition of the former facility's pits for hydraulic lifts, stained soils were observed. The stained soil was sampled three (3) times and analyzed for DRO, GRO, RRO, metals, PCBs, SVOCs and VOCs in accordance with ADEC approved methods. In these samples, DRO, RRO, tetrachloroethylene (PCE), trichloroethylene (TCE), benzene, and dichloroethylene (DCE) were detected above 18 AAC 75.341 table B1 or B2 migration to groundwater cleanup levels. DRO was detected at a maximum value of 7,730 mg/kg; RRO was detected at a maximum value of 29,300 mg/kg; PCE was detected at a maximum value of 1.04 mg/kg; DCE was detected at a maximum values of 6.01 mg/kg; TCE detected at a maximum value of 4.29 mg/kg; and benzene was detected at a maximum value of 0.0247 mg/kg. None of the analytical results were above levels that would require the soils to be classified as RCRA hazardous waste utilizing a total constituent analysis (Rule of 20) instead of the TCLP analysis.

The stained soils (roughly 2,392 cubic yards) were removed from the excavation and stockpiled in accordance with ADEC guidance to be tested for contaminants of concern. Thirteen (13) confirmatory soil samples were collected at the base and sidewalls of the excavation pit in accordance with ADEC guidance and tested for GRO, DRO, RRO, and VOCs. In these samples, PCE was the only contaminant of concern detected above 18 AAC 75.341 Table B1 or B2 migration to groundwater cleanup levels. PCE levels ranged from non-detect to 0.0344 mg/kg and were detected above ADEC cleanup values directly above the water table in the excavation pit floor (i.e. in the smear zone).

A total of fifty three (53) soil samples were collected from the contaminated stockpiled soils and analyzed for GRO, DRO, RRO, and VOCs by ADEC approved methods. PCE and DRO were the only contaminants of concern detected above 18 AAC 75.341 Table B1 or B2 migration to groundwater cleanup levels. PCE levels ranged from non-detect to 0.102 mg/kg and DRO levels ranged from nondetect to 1,630 mg/kg.

Due to low levels of PCE present in the stockpiled soil (average concentration of 0.039 mg/kg and a maximum concentration of 0.102 mg/kg) there was not a cost effective way to treat the soils in Alaska. Therefore, ADEC approved of ADOT&PF's request to place the contaminated soils back in the excavation pit and manage the property as a contaminated site. Clean soils were placed back in the excavation pit first – until they reached the anticipated high groundwater level (roughly 15 feet bgs) . The contaminated stockpiles were then placed on top of the clean soil. This backfill was continued until the soil level reached the original grade. Roughly seventy-five percent of the contaminated soil from the stockpiles had been used

as backfill for the excavation pit. The remaining contaminated soil was used as the base of the loop ramp at the intersection of Glenn Highway and Bragaw (See Figure 1 for details).

In 2008, ADOT&PF facilitated the installation of three wells at the subject site to evaluate groundwater flow direction and determine the concentrations of contaminants of concern in groundwater. One well was placed near the middle of the area of contamination. The other two wells were placed approximately 100 feet in the anticipated down-gradient direction. (See Figure 1 for locations of the monitoring wells.) Following well installation and development groundwater samples were collected from each well and analyzed for DRO, RRO, and VOCs. In these groundwater samples, PCE was the only contaminant of concern detected. PCE levels ranged from 2.08 to 4.73 µg/L.

In 2009, ADOT&PF facilitated the sampling of the monitoring wells two times (once in winter and in the summer). Groundwater samples were collected from wells MW-1 through MW-3 and analyzed for VOCs by ADEC approved methods. In these groundwater samples, PCE was the only contaminant of concern detected and PCE levels ranged from 2.2 to 5.18 µg/L. Groundwater samples collected from monitoring well MW-2 which is located just south of the area of contamination slightly exceeded 18 AAC 75.342 Table C value of 5 µg/L.

In 2012, ADEC facilitated the sampling of the monitoring wells two additional times (once in winter and in the summer). Groundwater samples were collected from each well and analyzed for VOCs by ADEC approved methods. In these groundwater samples, PCE was the only contaminant of concern detected and the levels of PCE ranged from 1.76 to 4.20 µg/L.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for GRO, DRO, RRO, PCBs, VOCs, SVOCs, and metals. Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Tetrachloroethene (PCE)
- Diesel Range Organics (DRO)

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.

Contaminant	Site Cleanup Level (mg/kg)
• PCE	0.024
• DRO	250

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

Contaminant	Site Cleanup Level (mg/L)
• PCE	0.005
• DRO	1.5

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, and 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	PCE and DRO were not detected in surface soil above 18 AAC 75.341 Table B1 or B2 Direct Contact Levels.
Sub-Surface Soil Contact	De Minimis Exposure	PCE was not detected in subsurface soil above 18 AAC 75.341 Table B1 or B2 Direct Contact Levels.
Inhalation – Outdoor Air	De Minimis Exposure	PCE and DRO were not detected in soil above 18 AAC 75.341 Table B1 or B2 Outdoor Inhalation Levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Volatile organic compounds have not been detected within 100 feet of an occupied building. Any proposed change in land use will require DEC review and approval.
Groundwater Ingestion	De Minimis Exposure	Contaminants have not recently been detected above 18 AAC 75.345 Table C values, therefore risk via this pathway is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	It is unlikely that surface water is impacted because the nearest surface water body is more that ¼ mile away, and groundwater is not believed to be impacting properties to the south.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	No terrestrial or aquatic exposure routes are present.

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

PCE and DRO contamination above established default cleanup levels in soil remains on-site at 1 to 15 feet below ground surface as depicted in Figure 1. ADEC has determined there is no unacceptable risk to human health or the environment since site exposure pathways that are complete have been determined to be de minimis. Therefore, this site will be issued a Cleanup Complete- ICs determination subject to the following.

1 Any future change in land use may impact the exposure assumptions cited in this document. If land use, tenant and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore, ADOT&PF shall notify ADEC if ADOT&PF becomes aware of any change in land ownership and/or use, if earlier. The report

can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov. For example, if any buildings are proposed to be constructed or demolished within 100 feet of the known remaining soil Contamination as shown on Figure 1, ADOT&PF must notify ADEC prior to construction to allow ADEC to review the plans and perhaps modify the ICs because the vapor intrusion risk that is now considered insignificant due to current land use, may show a potential exposure risk.

2. 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 attached site figure.) (See Note 19.)

3. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

4. Installation of groundwater or drinking water wells at this site will require approval from ADEC.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, Institutional Controls will be terminated.

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, Todd Blessing at (907) 269-7699.

Approved By,

Linda Nuechterlein
Environmental Program Manager

Recommended By,

Todd Blessing
Environmental Program Specialist

Attachment A: Cleanup Complete-ICs Agreement Signature Page
Attachment B: Site Figure

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

Randy Vanderwood agrees to the terms of this Complete Determination-Institutional Controls determination as stated in this Record of Decision (ROD) document dated August 2, 2012 for the **ADOT&PF Former Napa Auto Car Care Center,** Hazard ID: 4490. 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 18 AAC 78.276(f).

_____
Signature of Authorized Representative, Title

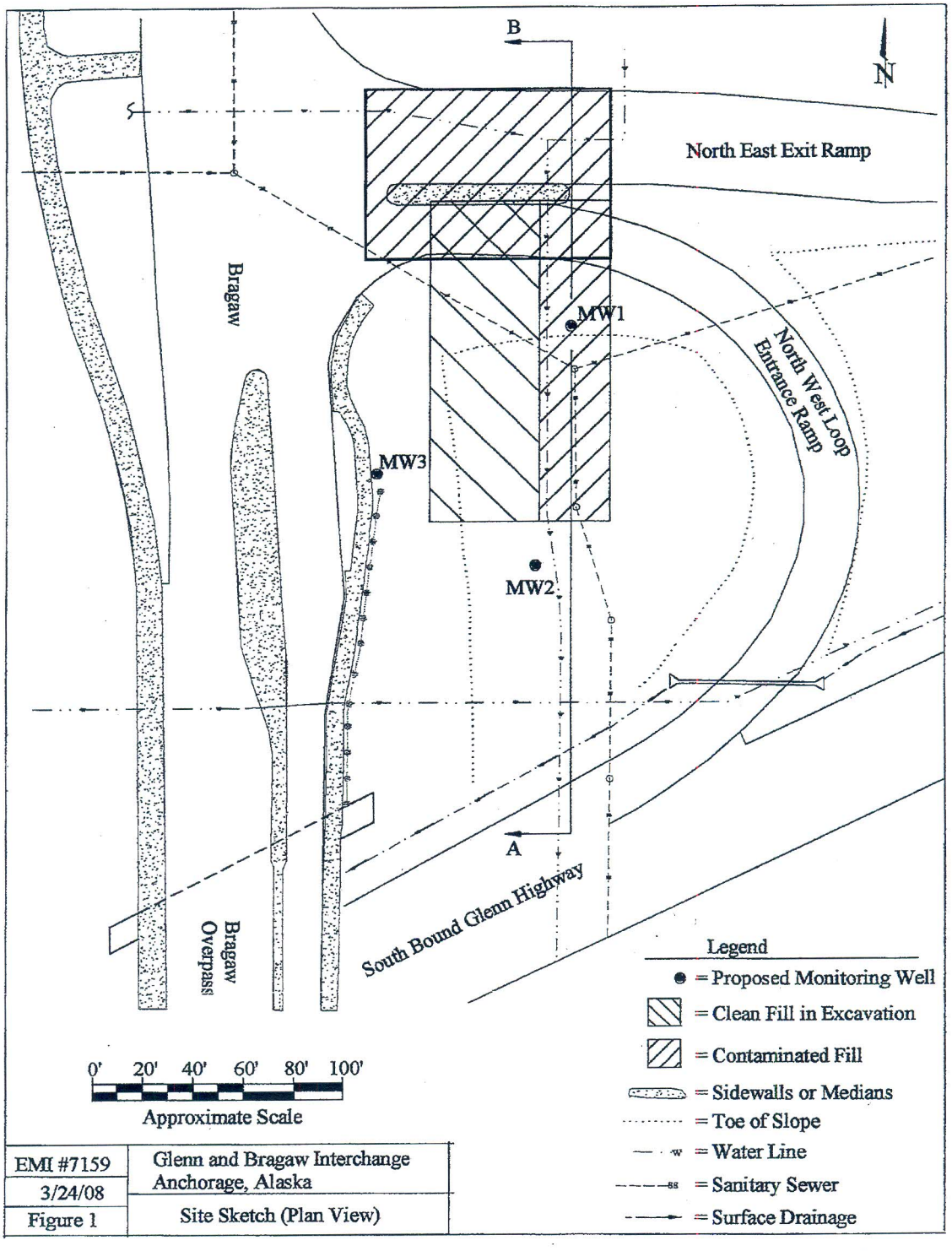
_____
Printed Name of Authorized Representative, Title
Randy Vanderwood

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

***Attention ADEC Administration Staff:** Please do not file this form until the ADEC project manager has updated the database.

ADEC File:#	2100.38.490
Hazard ID:	4490
ADEC Project Manager:	Todd Blessing

Attachment B: Figure 1



EMI #7159	Glenn and Bragaw Interchange Anchorage, Alaska
3/24/08	
Figure 1	Site Sketch (Plan View)