



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of Environmental
Conservation**

Division of Spill Prevention and Response
Contaminated Sites Program

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File: 1526.38.002

November 6, 2012

Mr. Eugene Hretzay, President
White Pass/Yukon Route Railroad
231 Second Avenue
Skagway, AK 998400435

Re: Decision Document: White Pass Coach Cleaning Shop – Cleanup Complete Determination

Dear Mr. Hretzay:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with White Pass Coach Cleaning Shop located at 21st and State Street, Skagway, AK. Based on the information provided to date, the ADEC 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 administrative record for White Pass Coach Cleaning Shop, which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) 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 Cleanup Complete Determination.

Site Name and Location:

White Pass Coach Cleaning Shop
21st and State Street
Skagway, Alaska 99840

Name and Mailing Address of Contact Party:

Mr. Eugene Hretzay
White Pass/Yukon Route Railroad
231 Second Avenue
P.O. Box 435
Skagway, Alaska 99840

Database Record Key and File

Number:

ADEC Reckey: 2000110118901
File: 1526.38.002
Hazard ID: 3268

Regulatory Authority

18 AAC 75.341

Background

The White Coach Cleaning shop was a railroad car wash down shop from 1898-1982 when the railroad ran from Skagway to Whitehorse. There is one small building and a small storage container left on the property. Since the building uses electric heat instead of an oil boiler, no fuel tanks are present on the property. In 1998-1999 the Alaska Department of Transportation and Public Facilities (ADOT&PF) reported diesel fuel on the water table in an excavated test pit on the western edge of State Street. The main objective of this test pit was to investigate diesel fuel along State Street. Two zones of free product were inferred to be present, one at the intersection of State Street and 20th Avenue, and the other just north of the intersection of State Street and 21st Avenue. The Coach Cleaning Shop site is located on the northeast corner of the intersection of 21st Avenue and State Street (Figure 1).

Characterization Activities

Due to the potential concerns regarding the unknown source of diesel fuel on the water table in the test pit located on the western edge of the property, an environmental assessment was completed in September 2000. A magnetometer survey was conducted on September 6, 2000 to try and identify any subsurface features that point toward an underground storage tank (UST). No UST was detected on site and surface soil was found not to be contaminated. Soil excavation occurred on September 7, 2000 near the ADOT&PF test pit. The excavation expanded to the south and east as contaminated soil was encountered. The excavation was limited in both east and west directions due to a concrete slab and a sidewalk (Figure 1). Excavated contaminated soil was temporarily stockpiled on site prior to being transported to an existing bioremediation cell at the former Skagway Tank Farm site. The excavation was backfilled with clean material from an offsite source.

Shallow groundwater was encountered at the depth of 6.5 to 7.0 ft as the excavation extended 0.5 to 1.0 ft below the groundwater table to approximate depth of 7.5 ft. The site is not on a well; the Skagway municipal water system serves the site and surrounding area from three wells accessing a deep aquifer cross gradient from this site.

Three out of the nine analytical samples (CCS-C5, C-6, & C-7) had diesel range hydrocarbon (DRO) concentrations exceeding ADEC cleanup levels (Table 1). The presence of a concrete slab restricted further excavation of contamination documented by CCS-C5 and CCS-C7, and sample CCS-C6 was collected at the property line. Analytical data indicated that the highest DRO concentrations were encountered at the edge of the property line along State Street, suggesting there was an unknown source migrating onto the property from under State Street, and not from the Coach Cleaning Shop property.

Table 1. Analytical field screening results from 2000.

Sample ID	Matrix	GRO mg/kg	DRO mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Xylenes mg/kg
CCS-C1	Soil	ND (1.53)	ND (25)	ND (0.038)	ND (0.038)	ND (0.038)	ND (0.038)
CCS-C2	Soil	ND (1.36)	ND (25)	ND (0.034)	ND (0.034)	ND (0.034)	ND (0.034)
CCS-C3	Soil	ND (1.35)	ND (25)	ND (0.034)	ND (0.034)	ND (0.034)	ND (0.034)
CCS-C4	Soil	ND (1.31)	ND (25)	ND (0.033)	ND (0.033)	ND (0.033)	ND (0.033)
CCS-C5	Soil	9.93	2370	ND (0.032)	ND (0.032)	ND (0.032)	0.112
CCS-C6	Soil	5.11	7930	ND (0.028)	ND (0.028)	ND (0.028)	ND (0.028)
CCS-C7	Soil	25	1870	ND (0.040)	ND (0.040)	0.0472	0.269
CCS-C8	Soil	ND (1.94)	ND (25)	ND (0.049)	ND (0.049)	ND (0.049)	ND (0.049)
CCS-C9	Soil	ND (1.50)	40.9	ND (0.038)	ND (0.038)	ND (0.038)	ND (0.038)
Method Two Migration to Groundwater Cleanup Criteria	Soil	300	250	0.025	6.5	6.9	63

Contaminants of Concern

The contaminant of concern for the site is diesel range hydrocarbons (DRO). A large volume of the contaminated soil was excavated in September 2000, but residual DRO contamination remains in place beneath State Street on the western property edge. The department has determined that the volume remaining on the Coach Cleaning Shop property beneath the concrete slab is de minimis and is associated with an offsite source, yet to be identified, coming from the ADOT/PF right-of-way.

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, under 40-inch Zone Migration to Groundwater.

<u>Contaminant</u>	<u>Migration to Groundwater Site Cleanup Level (mg/kg)</u>
DRO	250

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 2.

ADEC Decision

Based on the information available, the ADEC has determined no further assessment or cleanup action is required. The cleanup actions to date have served to adequately excavate, remove and remediate the contaminated soil from the site. DRO concentrations of 1870 mg/kg and 2370 mg/kg, in excess of the migration to groundwater cleanup level were documented below the concrete slab on the property, but represent a de minimis volume of DRO contaminated soil and are well below the ingestion pathway cleanup level of 10,250 mg/kg. Concentrations of DRO above the migration-to-groundwater cleanup level also remain the property boundary, beneath State Street. Based on the information available, the source of the contamination is from an unknown, off-site source, which has yet to be identified and fully characterized. By copy of this letter, we are notifying the ADOT/PF Southeast Region of this contamination, should they conduct future road work in this area.

DEC has determined there is no longer a risk to human health or the environment and no further assessment or cleanup action is required at the Coach Cleaning Shop site. This site will be designated as closed on the Department's database. This determination is in accordance with 18 AAC 75.380(d) 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.

Although a Cleanup Complete determination has been granted, DEC 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.

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.

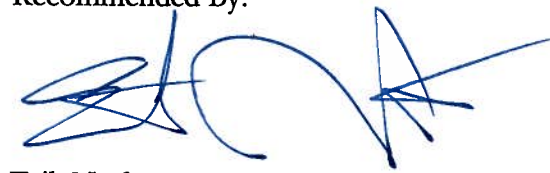
If you have questions about this closure decision, please contact the ADEC project manager, Erik Norberg at (907)465-5368.

Approved By:



Sally Schliching
SE Field Operations Unit Manager

Recommended By:



Erik Norberg
Environmental Program Specialist

CC w/encl: Edward Hanousek, General Manager, White Pass Yukon Route Railroad
Reuben Yost, C, M & Operations Director, ADOT/PF SE Region
Grant Lawson, Director, Municipality of Skagway Public Works
Gary Hamilton, Golder Associates
Andrea Badger, Golder Associates
Bill Janes, ADEC CSP State and Private Program Manager

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Direct Contact with Surface Soil.	Pathway Incomplete	There is no surface soil contamination at levels above the direct contact cleanup levels at the site.
Direct Contact with Sub-Surface Soil.	De minimis/exposure controlled	Contaminant levels documented at the site represent a limited area, are under a concrete slab and are below the ingestion/inhalation criteria.
Inhalation – Outdoor Air	Pathway Incomplete	The concentrations are too low and too deep in the soil to become an outdoor concern.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	De minimis contamination is confined to the subsurface under a concrete slab and the one structure onsite is on elevated supports.
Groundwater Ingestion	Pathway Incomplete	Shallow groundwater is present at the site at approximately 7 feet below ground surface, but is not used for drinking. The Skagway municipal water system serves the site and surrounding area. Contamination remaining onsite is de minimis and poses no risk to the city well field located several blocks cross gradient from the site and which pull water from depths ranging from 75-125 feet below ground surface.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	The site and environs are not a wild foods harvest area and none of the contaminants have potential to bioaccumulate in flora or fauna.
Exposure to Ecological Receptors	Pathway Incomplete	No contamination is present at the surface or near surface soils. No stressed vegetation has been observed on the property. Highly valued ecological receptors are not present at the site.

Notes to Table 2: “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.

Figure 1. Site figure of the property location on the corner of State Street and 21 Ave, Skagway, Alaska.

