



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. 2601.38.113

February 7, 2013

John Adams
Seattle General Agency
1715 West Nickerson Street
Seattle, WA 98119-1633

Re: Decision Document; Commercial Property- 319 Shelikof Street
Cleanup Complete Determination

Dear Mr. Adams:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Commercial Property- 319 Shelikof Street site located in Kodiak, 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 administrative record for the site Commercial Property- 319 Shelikof Street, 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

Commercial Property- 319 Shelikof Street
319 Shelikof Street
Kodiak, AK

Name and Mailing Address of Contact Party:

John Adams
Seattle General Agency
1715 West Nickerson Street
Seattle, WA 98119-1633

ADEC Site Identifiers:

Hazard ID #25979

CS file # 2601.38.113

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

A Phase I Environmental Site Assessment conducted at this property in support of a potential property transfer identified surface stains and a floor drain as recognized environmental conditions warranting further investigation. Further investigation and corrective action was conducted to address these issues in December, 2012 and January, 2013 as detailed in the Site Characterization and Cleanup section below.

This commercial property is located along the waterfront just southwest of a small boat harbor. All properties in this area are served by the Kodiak public water supply.

Contaminants of Concern

During the investigation and cleanup at this site, soil samples were analyzed for diesel range organics (DRO), residual range organics (RRO), volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX), polynuclear aromatic hydrocarbons (PAHs) and metals. Based on the results of these investigations, the following contaminants of concern were identified:

- Chromium
- DRO
- RRO

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.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
• Chromium (total)	25
• DRO	250
• RRO	9,700

Site Characterization and Cleanup

The floor drain source area at this site consisted of a concrete and plywood lined sump inside the seafood processing building, and a sub-surface outfall outside of the building near the sheet pile wall that delineates the harbor. A sample of the sludge inside the sump contained total chromium at 273 mg/kg, DRO at 5,040 mg/kg and RRO at 19,900 mg/kg. The sludge was removed and containerized on site.

After the sludge was removed, a leak test was conducted that indicated the sump was not intact. The sump was removed and an analytical soil sample collected below the former sump contained DRO at 410 mg/kg. Additional soil was removed and the second confirmation did not contain

contaminants above ADEC cleanup levels. Contaminated soil removed from below the sump was disposed of with the chromium contaminated soil at Waste Management Inc. in Arlington, Oregon.

The sump was connected to an outfall outside of the building. The outfall was excavated and a soil sample was collected to evaluate if the floor drain had discharged contaminants to the subsurface. Contaminants were not detected above cleanup levels in the outfall sample.

Investigation of the parking lot stains consisted of excavating the frozen soil to a depth of 2-3 feet below the stained area and collecting soil samples. These samples did not contain contaminants above cleanup levels.

Groundwater was not encountered at any time during these investigations.

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	De Minimis Exposure	The surface stains present in the parking lot at this site are de minimis in volume, and were removed.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	Contaminants in subsurface soil are below cleanup levels and de minimis in volume
Inhalation-Outdoor Air	De Minimis Exposure	The remaining contamination is below cleanup levels and de minimis in volume
Inhalation-Indoor Air	Pathway Incomplete	Volatile compounds are not present in soil at the site.
Groundwater Ingestion	Pathway Incomplete	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.

Sincerely,



William O'Connell
Environmental Program Specialist