

STATE OF ALASKA

SARAH PALIN, GOVERNOR

**DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM**

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File: 2540.38.006

March 14, 2008

Ron Stroman
ADOT&PF
Aviation Leasing & Airport Land Development
P.O. Box 196900
Anchorage, Alaska 99519-6900

Re: Former Mark Air Facility, Dillingham Alaska Airport:
Dillingham Airport Lot 7A, Block 500A: ADEC Spill # 1992250135701
Conditional Closure

Dear Mr. Stroman:

The Department of Environmental Conservation, Contaminated Sites Program (ADEC) has reviewed the administrative record for this former Mark Air Facility at the Dillingham Airport, Lot 7A, Block 500A. The file addressed the removal of a 500 gallon heating oil underground storage tank (UST) during 2004. The analytical data confirmed there are areas of petroleum contaminated soil remaining in the ground at concentrations above ADEC soil cleanup levels found in 18 AAC 75.341. However, ADEC has determined that there is no unacceptable risk posed to human health or the environment, subject to conditions outlined in this decision document.

Based on this determination, there is no further remedial action required at this time and a conditional closure determination is approved. This letter summarizes the information considered in making this decision regarding the environmental status of this site.

Background

This release was discovered during the removal of a 500 gallon heating oil UST located at Lot 7A, Block 500A, Dillingham Airport, Alaska in 2004. Mark Air leased the property from the State of Alaska from 1984 to 1996. Mark Air utilized the building as a cargo/terminal facility. Mark Air utilized portable above ground storage tanks (ASTs) and a truck mounted AST for refueling operations. No releases were observed due to the ATSS.

The former Mark Air site is located on the northwest side of the airport. The heating oil UST was located adjacent to the northwest side of the building. Heating fuel is currently supplied by

an AST located adjacent to the former UST location. The UST was located in a partially paved area adjacent to two propane tanks and the current heating oil AST.

The UST appeared to be in good shape when removed with no noticeable holes. The excavation was limited by the propane storage tanks and heating oil AST to the north, the building to the east, and buried electric lines to the south and west. After field screening and taking confirmation samples the excavation was backfilled with clean imported gravel. The asphalt overlying the excavation was repaired with concrete. The area is used as a parking and storage area.

Perched groundwater was encountered during the UST removal. However, the local drinking water wells utilize a deeper aquifer. Subsequent sampling of the drinking water wells and groundwater monitor wells have not shown any contamination at this site.

Confirmation soil samples from the northwest sidewall and base of the excavation contained Diesel Range Organics (DRO) (4,500 – 7,770 mg/kg) and benzene (0.0259 - 0.0547 mg/kg) levels that exceeded ADEC cleanup levels. The contamination may extend beneath the building. Due to the existing infrastructure further excavation is not possible. The area of the excavation is now a paved parking area.

Approximately 75 cubic yards of contaminated soil has been landspread on a vacant area within the fenced Dillingham Airport.

The above exposure pathway analysis was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be one of the following: De Minimus Exposure, Exposure Controlled, or Pathway Incomplete.

Contaminants of Concern

The contaminants of concern for both soil and groundwater are associated with the releases of petroleum hydrocarbon constituents related to the heating fuel.

- Benzene, toluene, Ethylbenzene and xylenes (BTEX)
- Diesel range organics (DRO)

Pathway Evaluation

The exposure and/or migration pathways that may affect human health and the environment (outdoor and indoor air inhalation, ingestion of soil and dermal contact with soil, ingestion of groundwater or surface water and contaminant migration in the ground/surface water) were evaluated.

The residual soil contamination is weathered petroleum hydrocarbons. The remaining contamination is located 4.5 to 7.5 feet below ground surface. The area has been paved eliminating the current exposure pathways of soil ingestion and dermal contact. There may be an exposure to future site workers conducting excavation activities in the area, however the residual soil concentrations are below ADEC soil ingestion and inhalation cleanup levels.

The drinking water wells and monitor wells at the airport have been sampled. The analytical data have shown that the groundwater at this site is not contaminated above cleanup levels by the remaining soil contamination.

There is no surface water on site and therefore no completed migration pathway or human exposure pathway for surface water.

The remaining contamination at the former heating oil UST site is all subsurface and currently capped by the asphalt parking area or the building. No air testing has been done. It would be difficult to distinguish between fuel vapors present from normal airport operations and this residual contamination. Indoor or outdoor vapors attributable to the remaining soil contamination are not expected to pose unacceptable risk to human health because the heating fuel is weathered and of relatively low volatility.

Approximately 75 cubic yards of contaminated soil has been landspread on a vacant area within the fenced Dillingham Airport, however these soils also meet ADEC soil cleanup levels for ingestion and inhalation, and don't pose an unacceptable human exposure risk.

Cleanup Levels

The soil cleanup levels established for this site are 18 AAC 75.341 (Table B1 and B2) 'Migration to Groundwater' and 18 AAC 75.345 (Table C) for groundwater.

ADEC Decision

ADEC has determined that the cleanup actions taken at the former Mark Air facility located at the Dillingham Airport Lot 7A, Block 500A site are protective of human health and the environment and there is no unacceptable risk posed by the remaining contamination. No further remedial action is required at this time and this site is approved for conditional closure, subject to the following conditions:

1. ADOT&PF shall prohibit the installation of shallow groundwater wells at the site unless the proposal to install is reviewed and approved by ADEC. Any well proposed for the site must be drilled into the deeper aquifer to ensure protection of human health.
2. Due to the residual soil contamination documented on site, ADEC must pre-approve any off-site transport of soil from this site.

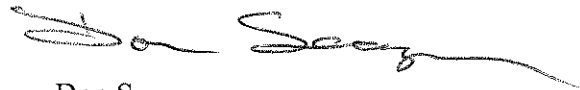
A Notice of Environmental Contamination will be listed on the ADEC Contaminated Sites database as an institutional control to document that there are areas remaining where soil contamination exceeds the most stringent ADEC soil cleanup levels.

Full site closure will be considered when it has been demonstrated that all soil at this site (landsread and former UST site soils) meets the applicable ADEC soil cleanup levels.

In accordance with 18 AAC 75.380(d)(2) and 78.276(f)(2), ADEC may require additional site assessment, monitoring, remediation, and/or other necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

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.

Sincerely,



Don Seagren
Environmental Specialist

CC: AL Gilbert, DOT&PF Facilities, Anchorage