THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

Division of Spill Prevention and Response
Contaminated Sites Program

610 University Ave.
Fairbanks, Alaska 99709-3643
Main: 907.451.2153
Fax: 907.451.5105

File: 102.26.053

June 27, 2013

Mr. James Colwell
Holland America Princess
800 5th Avenue, Suite 2600

Re: Decision Document; Westours Maintenance Facility
Corrective Action Complete with Institutional Controls Determination

Dear Mr. Colwell:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Westours Maintenance Facility located at 1980 South Cushman in Fairbanks, AK. 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 as long as the site is in compliance with established institutional controls (ICs).

This decision is based on the administrative record for the Westours Maintenance Facility which is located in the offices of the ADEC in Fairbanks, 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 with ICs determination. This document in no way precludes other agreements with ADEC such as previously established institutional controls or monitoring agreements.

Site Name and Location:
Westours Maintenance Facility
1980 South Cushman
Fairbanks, Alaska 99701
Seattle, WA 98104

Name and Mailing Address of Contact Party:
Mr. James Colwell
Holland America Princess
800 5th Avenue, suite 2600

ADEC Site Identifiers:
ADEC Reckey: 1991310012601
File: 102.26.053
Hazard ID: 24259
Source Area ID: 79342

Regulatory Authority for Determination:
18 AAC 75 and 18 AAC 78

Background
The Westours Bus Maintenance Facility is located at 1980 South Cushman Street in a commercial land use area. Groundwater at the site averages 10 feet below ground surface (ft bgs) and flows to the north-northwest. This area is served by a community water system and no drinking water wells are known to be present on the property or in the immediate vicinity.

Prior to 1960, the site was operated as a residential trailer park but was acquired by Alaska Overland Inc. in 1960 and used for the maintenance and storage of school buses. Alaska Overland formed Alaska Highway Tours, which eventually became Westours, Inc. who own and/or operate the site today. Three buildings are present on the site: a storage building, a maintenance shop, and a small shed on the east side of the maintenance shop. Site activities have included vehicle fueling, washing, storage, painting, and mechanical maintenance and repair.

This site was originally impacted by leaks and spills from 5 underground storage tanks (USTs), which are identified in ADEC's Contaminated Sites Program (CSP) database as Hazard ID 24259, Source Area ID 77823. In addition, another contaminated site known as Westours Bus Maintenance Facility (Hazard ID 551) existed on the site and included releases from a dry sump area and from vehicle washing runoff which contaminated a surface ditch on the southern property line (see figure 1). Soil in these areas was excavated and treated in an on-site remediation cell, but some contamination remained in sub-surface soils. These sites were re-evaluated in 2006 and ADEC granted a closure with institutional controls (ICs) for both sites in 2007.

In 2012, ADEC was notified of contamination detected during the removal of a 6th UST and associated piping at the site, and due to this notification of a new spill the site was returned to active status. The UST removed in 2012 supplied diesel fuel to a dispenser island and a boiler, and leaks from a piping joint was the suspected source of contamination.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for gasoline range organics (GRO); diesel range organics (DRO); residual range organics (RRO); benzene, toluene, ethylbenzene, and xylenes (BTEX); semi-volatile organic compounds (SVOCs) and polynuclear aromatic hydrocarbons (PAHs). Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Diesel Range Organics (DRO)

The contaminant of concern listed here applies only to the recently reported spill associated with the 2012 UST removal. Contaminants of concern listed under the previous Cleanup Complete with ICs Determination, issued on April 20, 2007, continue to apply to this site and established cleanup levels associated with these contaminants remain the same, as listed in 18 AAC 75.341 tables B1 and B2, and 18 AAC 75.345 table C.

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)
• Diesel Range Organics	250

Site Characterization and Cleanup Actions

The UST excavation was conducted on June 20, 2012 by Statewide Petroleum Services (SPS) under the supervision of Restoration Science and Engineering, LLC (RSE). Field screening and sampling was conducted by RSE. Excavated soil was screened with a photo ionization detector (PID), and soil with field screening results greater than 10 parts per million by volume (ppmv) was placed in a stockpile separate from soil with lower screening results. This impacted stockpile contained approximately 10 cubic yards (cy) of soil. The unimpacted stockpile containing soil with screening results less than 10 ppmv was approximately

45 cy in volume and was used for backfill. The piping run, which was buried at a depth of approximately 1 ft bgs was exposed and at least one screening sample was taken for every 10 feet of piping. One joint was observed between the UST and the Boiler Room.

Following removal of the UST, laboratory samples were collected from locations exhibiting the greatest field screening results. Four soil samples were collected from the base of the excavation (EX-1 through EX-4), one sample from beneath the dispenser island (EX-6), one from beneath the dispenser piping (EX-5), and one from the boiler room piping trench at the piping joint (PT-4). Stockpile confirmation samples were also taken; sample ISP-4 was collected from the impacted stockpile, while SP3 and SP3-2 were taken from stockpiled soil that was used as backfill. All of the soil samples were analyzed for DRO, RRO, GRO, and BTEX, and the sample collected from the impacted stockpile (ISP-4) was also analyzed for SVOCs (including PAHs).

Samples from the 45 cy stockpile used for backfill (SP-3 and SP3-2) did not contain detectable concentrations of any analytes above the 18 AAC 75.341 cleanup levels, confirming that soil used for backfill was not significantly impacted by hydrocarbon contamination.

The sample from the impacted soil stockpile (ISP-4) contained DRO at a concentration of 2,640 milligrams per kilogram (mg/kg). GRO, RRO, BTEX, and SVOCs were not detected in this sample. Dibenzofuran, fluorine, and phenanthrene were the only PAH compounds detected, and were present in sample ISP-4 below their 18 AAC 75.341 soil cleanup levels. The 10 cubic yard impacted soil stockpile was approved for transport and disposal at Organic Incineration Technologies (OIT) on September 25, 2012.

Sample PT-4 was collected beneath the piping joint at a depth of approximately 18 inches bgs (i.e., 6 inches beneath the piping). This sample contained DRO at a concentration of 1,060 mg/kg.

On October 20, 2012, RSE collected soil samples from a test pit at the location of the piping joint, in an effort to delineate the vertical extent of contamination at this location. Field screening was conducted with a PID and the sample exhibiting the highest PID reading, along with a sample from the excavation bottom, were sent to the laboratory for analysis. Sample RSE-2 and its duplicate sample RSE-X were taken from a depth of 3.1 ft bgs, and RSE-4 was collected at 4.1 ft bgs. Both samples were analyzed for GRO, DRO, RRO, and BTEX, and RSE-2 was also analyzed for PAHs. None of the contaminants detected exceeded their 18 AAC 75.341 cleanup levels in these samples, indicating that contamination in this area was limited to a depth of less than 2 feet.

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
Surface Soil Contact	De-minimis exposure	Hydrocarbon contamination remains in surface soil but at concentrations below ADEC's incidental ingestion cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Hydrocarbon contamination may remain in subsurface soil but at concentrations below ADEC's incidental ingestion cleanup levels.

Inhalation – Outdoor Air	De-minimis exposure	Contaminants were not detected above ADEC's outdoor inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	Contaminants were not detected in soil above ADEC's most stringent soil cleanup levels; therefore, exposure via this pathway is considered insignificant
Groundwater Ingestion	Pathway incomplete	Contaminants are not present in subsurface soil at concentrations above the migration to groundwater pathway, and this area is served by a community water system.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	Site is in an industrial area where wild foods are not harvested.
Exposure to Ecological Receptors	Pathway incomplete	Site is in an industrial area and no ecological receptors 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

Contamination remains on site above established default cleanup levels in the vicinity of the former UST piping, southeast of the vehicle storage building. However, ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be issued a Corrective Action Complete determination-Institutional Controls subject to the following:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore, Holland America Princess shall report to ADEC every five years to document land use, or report as soon as Holland America Princess 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.**

2. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 78.600(h). 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.

3. Soil contamination is located in the vicinity of the piping joint that was located between the former UST and the Boiler Room of the warm vehicle storage building (southeast of the storage building; see attached site figure). Any excavation of soil in this area must be approved by ADEC, and the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.

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

5. Institutional controls previously established at the site in a decision document dated April 20, 2007 and in a Notice of Environmental Contamination recorded on March 2, 2007, and relating to VOC and petroleum contamination to the north and south of the vehicle maintenance

building, remain in effect as outlined in those documents, which are available at http://dec.alaska.gov/Applications/SPAR/CCReports/IC_Closure_Report.aspx?Hazard_ID=24259.

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 78.276(f) 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.

Please sign and return *Attachment A* to ADEC within 30 days of receipt of this letter. If you have questions about this closure decision, please feel free to contact me at (907) 451-2153.

Sincerely,

Robert A. Burgess

Robert Burgess
Environmental Program Specialist

Enclosure: Attachment A: Cleanup Complete ICs Agreement and Signature Page
Attachment B: Site Figures

cc: Nick Braman, Restoration Science & Engineering, LLC (via email)
Lucus Gamble, Restoration Science & Engineering, LLC (via email)

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

Holland America Princess agrees to the terms of this Corrective Action Complete Determination-Institutional Controls as stated in this Closure Decision Document dated **June 27, 2013** for the Westours Maintenance Facility site. 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 78.276(f).

_____

Signature of Authorized Representative, Title
James Colwell, Holland America Princess

_____

Printed Name of Authorized Representative, Title
James Colwell, Holland America Princess

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

Attachment B: Site Figures

Figure 1: Site figure from 2007 decision document showing areas of remaining contamination.

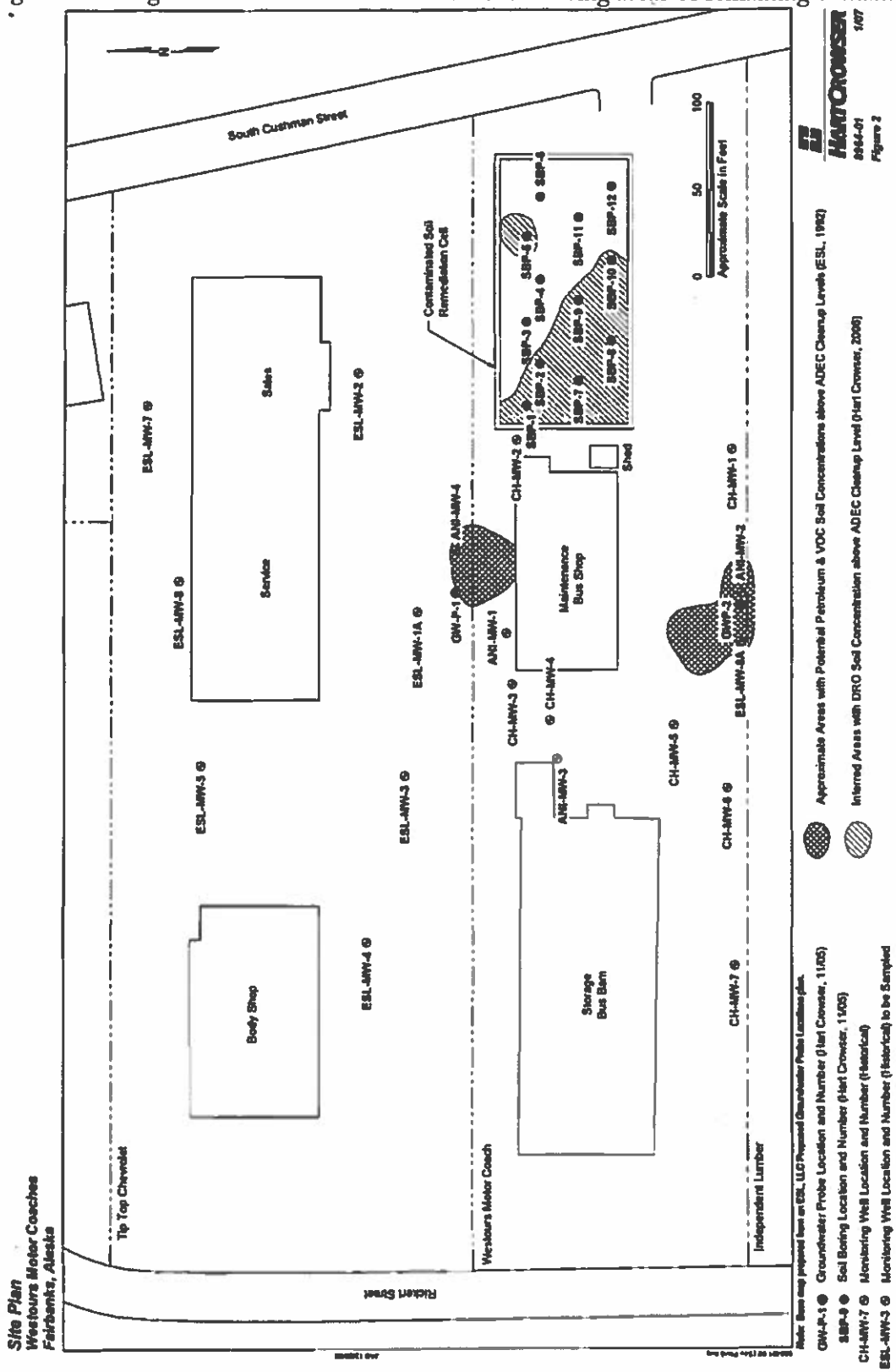

Figure 2. Site figure from 2012 site assessment report. Diesel range organic (DRO) contamination remains in surface soils in the vicinity of PT-4.