



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

Department of  
Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE  
Contaminated Sites Program

555 Cordova Street  
Anchorage, Alaska 99501  
Phone: 907.269.7503  
Fax: 907.269.7649  
dec.alaska.gov

File No: 2100.26.168

August 13, 2013

James Herrick  
P.O. Box 7611  
Nikiski, AK 99635

Re: Decision Document; Herrick's Repair Shop.  
Corrective Action Complete Determination

Dear Mr. Herrick;

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the environmental records associated with Herrick's Repair Shop located at 4241 Lakeshore Dr., Anchorage, AK 99502. 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 the administrative record for the Herrick's Repair Shop which is located in the offices of 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 Corrective Action Complete Determination.

**Site Name and Location:**

Herrick's Repair Shop  
4241 Lakeshore Dr.  
Anchorage, Alaska 99502  
Block 17, Lot 12  
ADA 4061 International Airport Subdivision

**Name and Mailing Address of Contact Party:**

James Herrick  
P.O. Box 7611  
P.O. Box 67  
Nikiski, AK 99635

**DEC Site Identifiers:**

ADEC Reckey: 1995210035501  
File: 2100.26.168  
Hazard ID: 23701

**Regulatory Authority for Determination:**

18 AAC 75 and 18 AAC 78

## Background

Herrick's Repair Shop operated on land leased from the Alaska Department of Transportation and Public Facilities at the Anchorage International Airport from 1980 until the late 1990s. In 1985, two 3,000 gallon aviation gasoline underground storage tanks (USTs) and a dispenser were installed at the property and used until 1990. Soil contamination was noted following the removal of the USTs in 1995.

On July 3, 2007, in accordance with 18 AAC 75.350, ADEC issued a determination that the unconfined groundwater above the Bootlegger Cove Formation at the Anchorage International Airport is not a current or future drinking water source. Drinking water for this and all nearby properties is provided by the Anchorage Water and Wastewater Utility

## Contaminants of Concern

During the investigations at this site soil samples were analyzed for gasoline range organics (GRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Gasoline Range Organics (GRO)
- Benzene

## 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, for the inhalation and ingestion pathways.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
• Gasoline Range Organics	1,400
• Benzene	11

## Cleanup Actions

In 1995 Woodward-Clyde was contracted to remove the two 3,000 gallon USTs, dispenser, and associated piping. The excavation was guided by field screening and confirmation soil samples collected from the bottom and sides of the excavation contained GRO up to 680 mg/kg and benzene up to 3.2 mg/kg. During removal of the piping a small amount of fuel flowed back into the excavation potentially resulting in elevated concentrations of GRO and benzene in the soil samples.

Soil samples collected from the dispenser and piping run did not contain contaminant concentrations indicative of a release.

The excavated soil was stockpiled adjacent to the excavation pit and used as fill after the USTs were removed.

## 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**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Surface Soil Contact	Pathway Incomplete	There was no surface soil contamination associated with the 1995 UST excavation.
Sub-Surface Soil Contact	De-minimis Exposure	The remaining contamination is below inhalation and ingestion cleanup levels, covered by clean fill and capped by asphalt.
Inhalation – Outdoor Air	Pathway Incomplete	The remaining contamination is below inhalation and ingestion cleanup levels, covered by clean fill and capped by asphalt.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	The remaining contamination is below inhalation cleanup levels, covered by clean fill and capped by asphalt. The building at the site is located greater than 30 feet from the former UST location, therefore this pathway is considered incomplete.
Groundwater Ingestion	Pathway Incomplete	An ADEC 18 AAC 75.350 determination has been issued for this area indicating the shallow groundwater is not a current or potential future source of drinking water.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used 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	Contamination remains in the subsurface, but is covered with clean backfill. Any exposure to ecological receptors is considered de minimis.

**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 Contaminated Sites Database subject to the following standard conditions:

1. 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. (See attached site figure.)
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

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.

If you have questions about this closure decision, please feel free to contact me at (907) 269-7551

Sincerely,



Katrina Chambon  
Environmental Program Specialist

Attachment: Lake Hood Shore Line Groundwater Use Determination

Cc via email: Scott Lytle, ADOT&PF AIA, Anchorage  
Kenneth Gene Zerkel, Anchorage

# STATE OF ALASKA

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

**SARAH PALIN, GOVERNOR**

555 Cordova Street  
Anchorage, AK 99501-2617  
Phone: (907) 269-7503  
Fax: (907) 269-7649  
<http://www.dec.state.ak.us/>

File No.: 2100.38.028.05

March 19, 2007

Scott Lytle  
Anchorage International Airport  
State of Alaska DOT&PF  
P.O. Box 196960  
Anchorage, Alaska 99519-6960

Re: Lake Hood Shore Line Groundwater Use Determination

Dear Mr. Lytle:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) recently reviewed the March 27, 2001 determination regarding groundwater use at the Anchorage International Airport (ANC). That determination was specific to the unconfined aquifer above the Bootlegger Cove Formation and was applicable only to certain areas (or zones) established in the 2004 Final Airport-Wide Risk Management Plan.

The subject groundwater was not considered a current or future drinking water source (in accordance with 18 AAC 75.350) within the Airside and Commercial Remediation Management Zones (RMZs). However, the Ecological RMZ was excluded from the groundwater use determination in 2001. In order to evaluate the current status of the groundwater use determination and make any amendments to the 2001 determination that may be appropriate, the following information was considered.

#### **Ecological Risk Management Zone**

The Ecological RMZ encompasses the numerous surface water bodies located on ANC. In addition, it described 200 feet of upland area adjacent to the lakes. ADEC recognizes the two habitats within the ecological RMZ that may support ecological receptors include: undeveloped upland habitats and surface water bodies.

The undeveloped uplands include wetland areas surrounding Meadow and Connor Lakes as well as the upland areas surrounding Lake Spenard and Lake Hood. The surface waters include Lakes Hood, Spenard, Delong, and Connors. The intent of establishing the Ecological RMZ was to ensure areas where contaminants may pose a risk to ecological receptors were adequately considered when risk management decisions were made.

Due to the nature and use of the land at the ANC, there are areas (the Airside and Commercial RMZs) that serve no ecological purpose. The land is either paved or developed for commercial airport activities. There are also areas (upland areas of Lakes Hood or Spenard) in the Ecological RMZ used for commercial aviation purposes. The Airport Wide Risk Management Plan noted that

March 19, 2007

those developed areas (within the Ecological RMZ) that are not expected to impact water quality standards and/or impact ecological receptors could be evaluated as if they were in the Commercial RMZ.

#### Hydrogeologic Conditions

The area most developed within the Ecological RMZ is Lake Hood and Lake Spenard. Large portions of the shore line were altered to accommodate the aviation uses of the lakes. The native shoreline has been amended by a combination of dredging and filling areas resulting in a complex mixture of sand, silt, gravel, and peat organics. The shore line is paved with asphalt or concrete in numerous areas and is relatively flat. Lake Hood is relatively shallow (less than about 20 feet deep) with the water level varying less than 1 foot during the year. This is an indication that the groundwater flow into Lake Hood is minimal (in regards to volume and/or impacts.)

Groundwater along the shore line is relatively shallow (1 to 8 feet deep). There is documented impact to the shallow groundwater from the commercial aviation activities at a number of Lake Hood lease sites but there is no evidence, at this time, of its migration into the lake.

#### ADEC Decision

ADEC has determined that the shallow groundwater along the Lake Hood and Lake Spenard shore lines is not a current or future drinking water source. Therefore, the March 2001 groundwater use determination is amended to include the shallow groundwater in the Ecological RMZ in that determination. This essentially recognizes that the shallow groundwater aquifer on the ANC facility is not considered a current or future drinking water source in accordance with 18 AAC 75.350.

This determination recognizes that the Lake Hood Shore Line is used for commercial aviation purposes and that the groundwater is not a current or future drinking water source. However, the groundwater in the Ecological RMZ will be evaluated (and managed) to ensure that it does not transport contamination where it might impact surface water quality standards and/or ecological receptors that might be present.

This determination is based on information presented to date. However, if future information identifies an area of contamination bordering Lake Hood that may pose a risk to human health or the environment, ADEC reserves the right to reconsider this groundwater use determination on a site specific basis and make any changes or amendments to it, including the requirement for additional investigative and/or cleanup action.

If you have any questions regarding this letter please contact Todd Blessing at 269-7699 or me at 451-5175.

Sincerely,

  
Jim Frechione  
Environmental Manager

cc. Tom Johnston, ANC  
John Barsalou, ANC  
Steve Bainbridge, ADEC, Fairbanks  
Todd Blessing, ADEC, Anchorage  
Tom Mushovic, AFSC