



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: 2100.26.220

August 29, 2013

AEL Anchorage LLC
3900 Arctic Blvd., Suite #101
Anchorage, AK 99503
Attn: Tom Corkran, Manager

Re: Closure Decision Document; Former Eastwind Construction Yard, 151 W. 100th Avenue,
Diesel UST release Corrective Action Complete Determination

Dear Mr. Corkran;

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the Former Eastwind Construction Yard diesel underground storage tank (UST) site located at 151 W. 100th Avenue in Anchorage, Alaska. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining from this release do not pose an unacceptable risk to human health or the environment, and this UST contaminated site will be closed.

This decision is based on the administrative record which is located in the offices of the Alaska Department of Environmental Conservation 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 this Corrective Action Complete determination.

Introduction

Site Name and Location:

Former Eastwind Construction Yard
151 W. 100th Avenue
Anchorage, Alaska 99515
SE1/4, NW1/4, Sec 18, T12N, R3W, SM,
Anchorage (A-8, NW) Quadrangle

Database Record Key and File Number:

ADEC Reckey: 1989210030703
File: 2100.26.220
Hazard ID: 24032

Name and Mailing Address of Contact Party:

AEL Anchorage LLC
3900 Arctic Blvd., Suite #101
Anchorage, AK 99503
Attn: Tom Corkran, Manager

**Regulatory authority under which the site
is being cleaned up:**

18 AAC 78
18 AAC 75

Background

Diesel fuel contamination was identified in soil and groundwater associated with a diesel underground storage tank system (UST) that was removed in 1989. During the UST removal an estimated 7,000 gallons of diesel fuel and contaminated water were pumped from the tank into a nearby drainage ditch which flowed into a wetland located to the west of the UST property.

Contaminants of Concern

During the investigations at this site, soil and groundwater samples were analyzed for diesel range organics (DRO), gasoline range organics (GRO), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Benzene
- GRO
- DRO

Cleanup Levels

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

Contaminant	Site Cleanup Level (mg/kg)
Benzene	0.025
GRO	300
DRO	250

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

Contaminant	Site Cleanup Level (mg/L)
Benzene	0.005
GRO	2.2
DRO	1.5

Site Characterization and Cleanup Activities

Contamination was identified during the 1989 UST removal and spill response to the discharge of 7,000 gallons of diesel fuel and contaminated water into a nearby drainage ditch and into a wetland to the west of the UST property. The highest concentrations of contaminants in soil were located off-property at one of the dams constructed during the spill response containment (Dam #3). During the spill response about 20 gallons of diesel fuel was recovered.

In 1990, the current property owner Eastwind entered into a Compliance Order By Consent (COBC) with the DEC for the release investigation, cleanup, and monitoring of the diesel fuel contamination at this site. Later in 1990, 127 tons of contaminated soil was excavated from the drainage ditch and transported off property for treatment and disposal.

In 1993, three groundwater monitoring wells were installed and sampled. The monitoring wells had up to 15 milligrams per liter (mg/l) DRO. Groundwater monitoring continued until 1999, in 1999 there was up to 3.47 mg/l DRO in the groundwater with depth to groundwater 11 to 15 feet below ground surface.

In 1994, 1995, and 1996 additional contaminated soil was excavated from the Dam #3 area and transported off-property for thermal treatment. Up to 5,100 mg/kg DRO was left after the excavation work in 1996.

In 2012 eleven soil borings and three replacement monitoring wells were installed and sampled. The groundwater in these monitoring wells had up to 0.575 mg/l DRO. The samples from the soil borings had up to 1,900 mg/kg DRO and 0.0315 mg/kg benzene.

Later in 2012, 7,629 tons of contaminated soil was excavated from the former UST area and transported off property for thermal treatment. During the excavation work, about 13,000 gallons of contaminated water with up to 8.9 mg/l DRO was pumped from the excavation for disposal in the sanitary sewer system in accordance with a discharge permit. After the removal of the contaminated soil and groundwater, samples from the monitoring wells did not contain detectable concentrations of DRO, GRO, or benzene and confirmation soil samples collected from the excavation did not contain contaminants above the most stringent migration to groundwater cleanup levels.

In 2013, a review of the as-built drawing from the C Street extension project indicated the Dam #3 area was now under the paved roadway. Later in 2013 the monitoring wells were decommissioned in accordance with an approved plan.

Cumulative Risk Calculation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations do not pose a cumulative human health risk at this site.

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	Contaminants in sub-surface soil confirmation samples were below most stringent cleanup levels and the remaining contaminated soil is considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.
Sub-Surface Soil Contact	De-Minimis Exposure	Contaminants in sub-surface soil confirmation samples were below most stringent cleanup levels and the remaining contaminated soil is considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.

Inhalation – Outdoor Air	De-Minimis Exposure	Remaining petroleum contamination is below the inhalation cleanup level for soil. Therefore risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Remaining petroleum contamination is below the inhalation cleanup level for soil. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	De-Minimis Exposure	Contaminants were detected in groundwater, but at concentrations below default cleanup levels and the property is served by city water. Therefore risk via this pathway is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	The nearest surface water body, Campbell Creek is located 5,300 feet from the site. Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	This area is not used for harvesting wild foods.
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 UST site will be designated as closed on the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.274(b). 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.

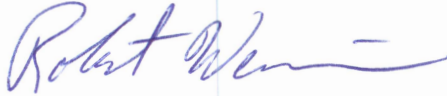
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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 decision document, please contact the ADEC Project Manager, Robert Weimer at (907) 269-7525.

Sincerely,



Robert Weimer
Environmental Engineering Associate

cc: Susan Reeves Esq., Reeves Amodio, LLC
Scott Erdman, TELLUS Ltd.