



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: 2100.38.069

October 30, 2014

Laura Brooks Cantrell, CPM
Wiley Brooks Company, Inc.
2525 Blueberry Road #204
Anchorage, AK 99503

Re: Decision Document: Mt. McKinley Professional Building
Cleanup Complete Determination

Dear Ms. Cantrell:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the Mt. McKinley Professional Building site, located at 733 West 4th Avenue, in Anchorage. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

Site Name and Location:

Mt. McKinley Professional Building
733 West 4th Avenue
Anchorage, AK 99501

Name and Mailing Address of Contact Party:

Laura Brooks Cantrell, CPM
Wiley Brooks Company, Inc.
2525 Blueberry Road #204
Anchorage, AK 99503

DEC Site Identifiers:

File No: 2100.38.069
Hazard ID: 3917

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

The site is located at 733 West 4th Avenue in Anchorage. The area surrounding the site is primarily commercial in nature, and is paved. Additionally, there are no drinking water wells located within 100 feet of the site.

Roughly three tons of soil (one cubic yard) were generated during replacement of the elevator's hydraulic cylinder in July of 2002. The soil was removed with an auger to make room for the new

(wider) cylinder and casing, which were buried to about 50 feet below ground surface (bgs). The soil was stockpiled on a tarp near the north side of the building, and was left uncovered. The stockpile was characterized for disposal on December 9, 2002, following an observed sheen coming from the pile. Results of the characterization revealed that diesel range organics (DRO) were present in the pile at 20,800 mg/kg and residual range organics (RRO) were present at 10,800 mg/kg which exceeds ADEC cleanup levels for DRO and RRO. The soil stockpile was transported to Alaska Soil Recycling (ASR) on May 19, 2003 for disposal.

The ADEC received a request for site closure, dated October 23, 2014, which provided additional site history and a conceptual site model (CSM), and indicated that further investigation is not practical at this time. In an interview with Otis Elevator (Otis), it was noted that the former casing was kinked during removal and may have released a minimal amount of oily fluids into the borehole. However, upon inspection of the casing and hydraulic cylinder, there was no evidence of leaks or failures. If the hydraulic cylinder had failed, the elevator would not have been able to operate. Therefore, it is unlikely that the casing and/or cylinder released any substantial amount of oil while in operation.

Contaminants of Concern and Cleanup Levels

The following petroleum contaminants, DRO and RRO, were present in soil above the ADEC cleanup levels for the under 40-inch precipitation zone, established in 18 AAC 75.341(c), Table B1, and 18 AAC 75.341 (d), Table B2.

Table 1 – ADEC Cleanup Levels

| Contaminant | Soil – MTG (mg/kg) | Soil – Ingestion (mg/kg) | Soil – Inhalation (mg/kg) |
|-------------|-----------------------|-----------------------------|------------------------------|
| DRO | 250 | 10,250 | 12,500 |
| RRO | 11,000 | 10,000 | 22,000 |

Mg/kg = milligrams per kilogram

MTG = migration to groundwater

Cumulative Risk Evaluation

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.

Exposure 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 2.

Table 2 – Exposure Pathway Evaluation

| Pathway | Result | Explanation |
|---|---------------------|--|
| Surface Soil Contact | Pathway Incomplete | Contamination is not present in surface soil (0 to 2 feet below ground surface). |
| Sub-Surface Soil Contact | De-Minimis Exposure | Contamination may remain in the sub-surface soil above ingestion cleanup levels; however, the contaminated soil is located beneath the onsite building, and is not accessible. Therefore, exposure via this pathway is considered insignificant. |
| Inhalation – Outdoor Air | De-Minimis Exposure | Contamination may remain in the sub-surface soil above inhalation cleanup levels; however, the contaminated soil is located beneath the onsite building, and is not accessible. Additionally, the surrounding area is paved. Therefore, risk via this pathway is considered insignificant. |
| Inhalation – Indoor Air (vapor intrusion) | Pathway Incomplete | Contamination is not volatile. |
| Groundwater Ingestion | Pathway Incomplete | The site is located in an area that is primarily commercial in nature, and there are no drinking water wells within 100 feet of the site, and the area is served by public water system. |
| Surface Water Ingestion | Pathway Incomplete | Surface water is not used as a drinking water source in the vicinity of the site. |
| Wild and Farmed Foods Ingestion | Pathway Incomplete | The area surrounding the site is primarily commercial in nature and is paved. Therefore, this pathway is considered incomplete. |
| Exposure to Ecological Receptors | Pathway Incomplete | There are no terrestrial or aquatic exposure routes. |

Notes to Table 2: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be affected by the minimal volume or concentration 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

This site will receive a “Closed” designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325. 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.

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

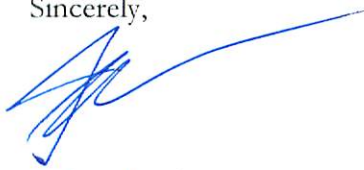
This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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 99811-1800, 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 99811-1800, 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) 269-7691.

Sincerely,



Joshua Barsis
Environmental Program Specialist

cc: RFA via email at dec.spar.cr@alaska.gov
Kamie Willis, DOL (via email)