



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of Environmental
Conservation**

Division of Spill Prevention and Response
Contaminated Sites Program

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File: 100.26.187

January 22, 2014

Mike McCrum
Bureau of Land Management
222 W. 7th Avenue, #13
Anchorage, AK 99513

Re: Decision Document: BLM Northern District Office, Corrective Action Complete Determination

Dear Mr. McCrum:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the Bureau of Land Management (BLM) Northern District Office site. 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
BLM Northern District Office
1150 University Avenue
Fairbanks, Alaska 99709

DEC Site Identifiers
File No: 100.26.187
Hazard ID: 25845

Regulatory Authority for Determination
18 AAC 75 and 18 AAC 78

Site Description and Background

A 10,000-gallon heating oil underground storage tank (UST) was installed in 1984 or 1985, during construction of the BLM main facility at 1150 University Avenue. The UST and associated piping was removed in 1996.

Contaminants of Concern

The following petroleum contaminants of concern, those above approved cleanup levels, were identified during the course of the site investigations summarized in the Characterization and Cleanup Activities section of this decision letter.

- Diesel Range Organics (DRO)

Cleanup Levels

The ADEC Cleanup Matrix Score sheet (18 AAC 75.341 Table A1, Method 1) was used to calculate cleanup levels for this site. Based on site specific information, this site is Category B.

Table 1 – Approved Cleanup Levels

Contaminant	Cleanup Level (mg/kg)
DRO	200

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities

In 1996, the BLM contracted Montauk Environmental Engineering to remove the UST and associated piping. During the removal activities, the contractor encountered evidence of overfilling near the top of the tank. Approximately 1 cubic yard of petroleum contaminated soil was removed and transported off-site for treatment. Soil samples were collected from the contaminated stockpile and the limits of the excavation and analyzed for DRO and benzene, toluene, ethylbenzene, and xylenes (BTEX). The maximum result from the contaminated soil stockpile was 270 mg/kg DRO. The maximum result from the excavation was 58 mg/kg DRO. Xylenes were detected at a maximum concentration of 0.06 mg/kg. No other BTEX compounds were detected.

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	Contaminated surface soil was excavated and transported off-site for treatment.
Sub-Surface Soil Contact	De-Minimis Exposure	Residual contaminant concentrations are below the ingestion/inhalation cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Residual contaminant concentrations are below the inhalation/ingestion cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Contaminants of concern do not pose a vapor intrusion risk. Residual contaminant concentrations are below inhalation/ingestion cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered at the limits of the excavation. Residual contaminant concentrations are below the migration to groundwater cleanup level.

Surface Water Ingestion	Pathway Incomplete	Contaminated surface soil was removed and transported off-site for treatment. Residual contaminant concentrations are below the migration to groundwater cleanup level.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bio-accumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Contaminants of concern do not have the potential to bio-accumulate in plants or animals. This site is in a developed area.

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

Remaining petroleum contamination in soil is below approved cleanup levels. 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 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 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 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.

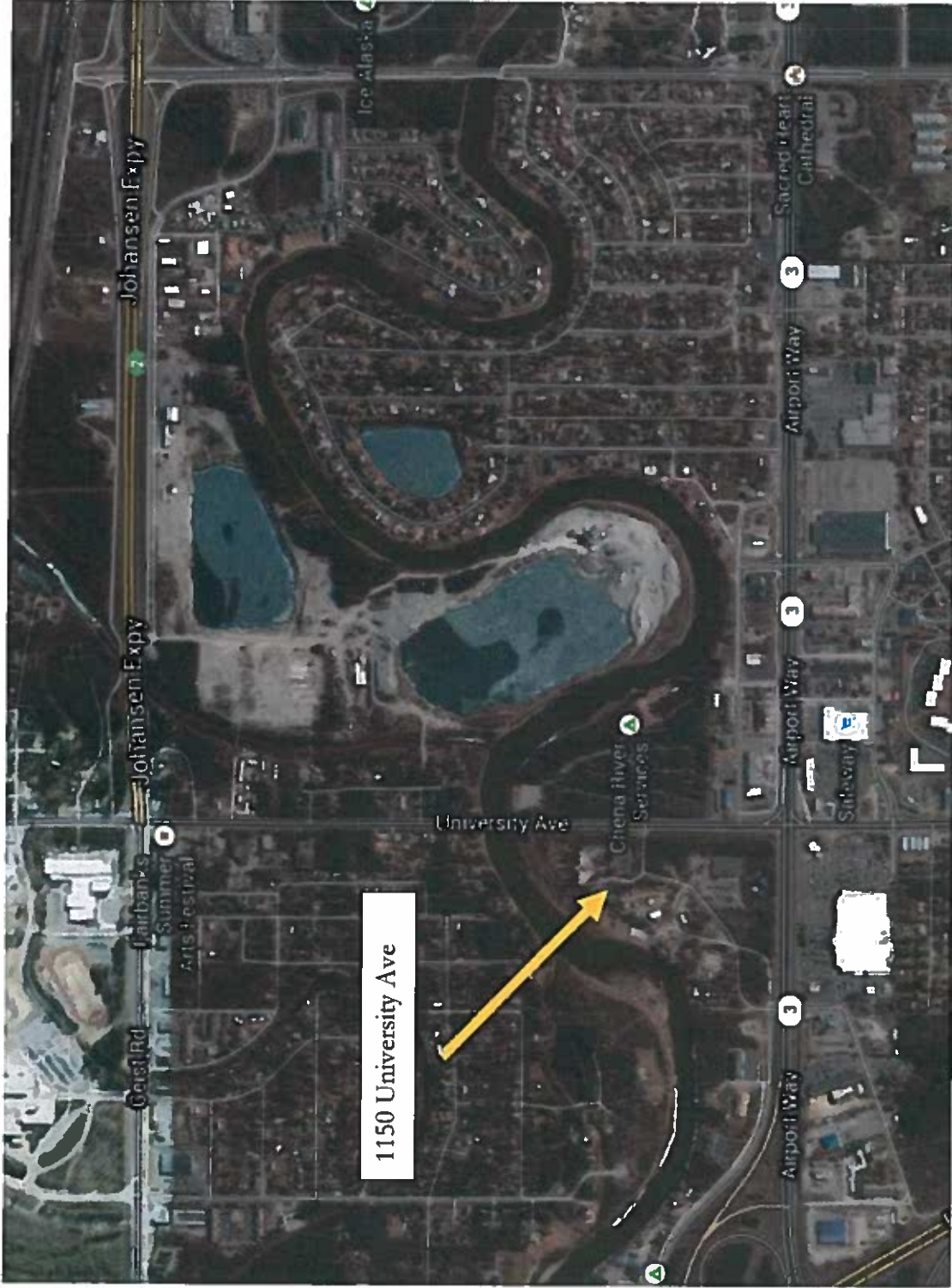
If you have questions about this closure decision, please feel free to contact me at melody.debenham@alaska.gov or (907) 451-5175.

Sincerely,



Melody Debenham
Environmental Program Specialist

Enclosure: Site Map



Source: Google Maps – December 2013