



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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File No: 2100.26.160

February 3, 2015

ERA FBO LLC  
Attn: Jeffrey Daniels, HSE/QA- Alaska  
6160 Carl Brady Drive  
Anchorage, Alaska 99502

**Subject: Decision Document: ERA Helicopters- Aviation Center- Blue Hangar  
Corrective Action Complete Determination**

Dear Mr. Daniels;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the ERA Helicopters- Aviation Center- Blue Hangar site located at Hangar #2 on Carl Brady Drive at the Ted Stevens Anchorage International Airport (TSAIA). 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 this site will be closed.

This decision is based on the administrative record for ERA Helicopters- Aviation Center- Blue Hangar site which is located in the offices of the 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:**

ERA Helicopters- Aviation Center- Blue Hangar  
West of Hangar #2 on Carl Brady Drive  
Ted Stevens Anchorage International Airport  
Anchorage, Alaska 99502

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

ERA FBO LLC  
Jeffrey Daniels, HSE/QA- Alaska  
6160 Carl Brady Drive  
Anchorage, Alaska 99502

**DEC Site Identifiers:**

File No: 2100. 26.160  
Hazard ID: 23686 UST Facility ID: 1476  
RecKey No: 1994210024303

**Regulatory Authority for Determination:**

18 AAC 75 and 18 AAC 78

### **Site Description and Background**

The site was the location of a former 10,000-gallon underground storage tank (UST) containing Jet B fuel and an associated dispenser, a 100-gallon waste oil UST, and a spill of an unknown source adjacent to the hangar near the waste oil UST. See Attachment B for the location of the tanks. Both tanks were part of ERA's UST facility #1476. Contamination at the site is attributed to leaks and spills from the USTs as well as the known spill near the hangar.

### **Contaminants of Concern**

During the investigations at this site, soil samples were analyzed for one or more of the following contaminants: extractable petroleum hydrocarbons (EPH), volatile petroleum hydrocarbons (VPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), polychlorinated biphenyls (PCB), volatile organic compounds (VOC), polycyclic aromatic hydrocarbons (PAH), and Resource Conservation and Recovery Act (RCRA) metals.

Based on results of the investigation and the applicable cleanup levels at the time of site discovery, the following Contaminants of Concern were identified in soil:

GRO  
DRO  
BTEX

### **Cleanup Levels**

The applicable soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Under 40 Inch Zone, for Outdoor Inhalation and Direct Contact/Ingestion.

In 2001, the ADEC approved of a groundwater use determination, in accordance with 18 AAC 75.350, in which the TSAIA demonstrated that the shallow unconfined aquifer around the airport is not used as a source for public or private drinking water wells. The groundwater use determination in 2001 established three "risk management zones" (RMZs) designated by TSAIA. The three RMZ are the Air Side RMZ, Commercial RMZ, and Ecological RMZ. The ERA Helicopters- Aviation Center- Blue Hangar (Hangar 2) site is within the Commercial RMZ.

In 2003, TSAIA requested that South Airpark not be covered by the groundwater use determination because ERA was operating two wells, one at Hangar 1 and the other at Hangar 2. The well at Hangar 1 was decommissioned in 2010 and the well at Hangar 2 was decommissioned in 2011 and the groundwater use determination was reapplied to the South Airpark site.

Since groundwater is not used for drinking water in accordance with the 2001 determination, the migration to groundwater soil cleanup levels and groundwater cleanup levels are no longer applicable to this site.

### **Characterization and Cleanup Activities**

In 1994, the 10,000-gallon Jet B UST, associated piping, dispenser and approximately 70 cubic yards of contaminated soil were removed. Confirmation soil samples did not indicate the presence of contamination remaining in the excavation. The contaminated soil was transported to and treated by Alaska Soil Recycling (ASR) in 1995.

In 2000, ERA's consultant informed the ADEC that there were two suspected USTs still at the Hangar #2 site. One UST, a 100-gallon waste oil tank under the footprint of the east side of the hangar, and the other a 300-gallon tank associate with a generator, also believed to be near the east side of the hangar. An investigation determined that the 300-gallon tank did not exist. The 100-gallon waste oil tank was closed in place with the approval of the ADEC. A soil sample collected below the waste oil tank did not contain contaminants above cleanup levels.

While excavating to investigate the waste oil tank, a spill of unknown origin was discovered adjacent to the tank but on the other side of the hangar building and foundation. Approximately 20 cubic yards of soil contaminated with DRO above the most stringent cleanup level was removed and sent to ASR for disposal. A confirmation soil sample collected from the excavation did not contain contaminants above cleanup levels.

### **Cumulative Risk Evaluation**

Pursuant to 18 AAC 78.600(d), 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 non-carcinogenic risk standard at a hazard index of one across all exposure pathways.

Cumulative risk was calculated assuming a residential land use and using the highest detected concentrations of contaminants from all of the soil samples collected. 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.

### **Exposure Pathway Evaluation**

Following a review of the environmental records for 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 or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

**Table 1 – Exposure Pathway Evaluation**

Pathway	Result	Explanation
Direct Contact with Surface Soil	De Minimis Exposure	Contaminants are not present above direct contact cleanup levels and the area is covered by concrete.
Direct Contact with Sub-Surface Soil	De minimis Exposure	Contaminants are not present above direct contact cleanup levels and the area is covered by concrete.
Inhalation-Outdoor Air	De-Minimis Exposure	Volatile contaminants are not present above outdoor inhalation cleanup levels.
Inhalation-Indoor Air	De-Minimis Exposure	The Jet B tank and dispenser are more than 30 feet from the existing structure and confirmation sampling indicated that contaminated soil was successfully removed. Confirmation sampling below the waste oil UST did not detect volatile compounds.
Groundwater Ingestion	Pathway Incomplete	Groundwater was determined to not be a current or future potential drinking water source through 18 AAC 75.350.
Surface Water Ingestion	Pathway Incomplete	There is no surface water nearby that could be affected by the contaminants.
Wild Foods Ingestion	Pathway Incomplete	The site is in a paved industrial area and no wild foods are collected.
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 or concentration of remaining contamination. “Pathway incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors.

### **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 Department’s 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 78.276 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,



Lisa Krebs-Barsis  
Environmental Program Specialist

Attachment A: Site Figure

cc: Scott Lytle

# Attachment A- Site Figure

## ERA Helicopters– Aviation Center– Blue Hanger (Hangar #2) Site Map



Former 10,000-gallon Jet B UST



Former Fuel Dispenser



Carl Brady Drive



100-gallon waste oil UST closed in place

