



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

555 Cordova St
Anchorage, AK 99501
Main: 907-269-8685
Fax: 907-269-7687
www.dec.alaska.gov

File: 330.38.125

Return Receipt Requested

Article No: 7012 1010 0003 0389 2133

March 2, 2015

Jan Shifflett
Response and Remediation SME
Alyeska Pipeline Service Company
PO Box 196660 Mail Stop 507
Anchorage, Alaska 99519

Re: Decision Document; Alyeska Remote Gate Valve 35A
Cleanup Complete

Dear Mr. Shifflett:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for Alyeska Remote Gate Valve 35A. 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:

Alyeska Remote Gate Valve 35A
600 feet southwest of
Milepost 218 Dalton Highway
Coldfoot, Alaska 99701

Name and Mailing Address of Contact Party:

Jan Shifflett, Response and Remediation SME
Alyeska Pipeline Service Company
PO Box 196660 Mail Stop 507
Anchorage, Alaska 99519

ADEC Site Identifiers:

File: 330.38.125
Hazard ID: 26247

Regulatory Authority for Determination:

18 AAC 75

Background

In 2013, crude oil was discovered in the galvanized steel sump at Alyeska pipeline remote gate valve (RGV) 35A. Initial response activities included recovery of 21 gallons of crude oil and removal of 2 cubic yards of contaminated soil. Additionally, 8 drums of water/oil saturated soils were removed. RGV 35A is located at Trans Alaska Pipeline System (TAPS) milepost 193.96, near milepost 218 of the Dalton Highway.

Contaminants of Concern

During the investigations at the site, soil samples and groundwater samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics, poly aromatic hydrocarbons (PAHs), and the volatile organic compounds (VOCs) benzene, toluene, ethylbenzene, and xylenes. Based on these analyses and knowledge of the source area, the following contaminants of concern (COC) were identified in groundwater:

- DRO
- RRO

ADEC Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B1 and B2, *Under 40 Inch Zone*. The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels

Table 1- Soil and Groundwater Cleanup Levels

Contaminants of Concern	Soil- Method Two, Direct Contact /Ingestion*	Soil- Method Two, Inhalation*	Soil- Migration to Groundwater(MTG)*	Groundwater#
DRO	10,250	12,500	250	1.5
RRO	10,000	22,000	11,000	1.1

Notes to Table 1. *All soil contaminant concentrations are presented in mg/kg.

#All groundwater contaminant concentrations are presented in mg/L.

Site Characterization and Cleanup Actions

In 2013, ten test pits were advanced to the groundwater interface at a depth of 1.7 to 4.1 feet below ground surface and three well points were advanced to characterize the site. Four soil samples collected from four of the ten test pits contained detectable concentrations of petroleum constituents but below Method Two Migration to Groundwater (MTG) cleanup levels. Only one of the well points sampled contained petroleum constituents above Table C groundwater cleanup levels. This well, MW-3, contained DRO up to 2.29 mg/L and RRO up to 2.76 mg/L. MW-3 was sampled again in July and August 2014. Groundwater samples collected contained detectable concentrations of DRO and RRO, but below the ADEC Table C groundwater cleanup levels.

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 this site, exposure to remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are 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	Contaminated surface soil was removed and remediated off site. This site is located along the TAPS. Exposure via this pathway is assumed insignificant.
Sub-Surface Soil Contact	De Minimis Exposure	Remaining contaminated subsurface soil is below direct contact/ingestion cleanup levels. This site is located along the TAPS. Exposure via this pathway is assumed insignificant.
Inhalation – Outdoor Air	De Minimis Exposure	Remaining contaminated soil is below inhalation cleanup levels. This site is located along the TAPS. Exposure via this pathway is assumed insignificant.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings on site. This site is located along the TAPS, and no building construction is anticipated in the future.
Groundwater Ingestion	Pathway Incomplete	Groundwater is below Table C and is not utilized as a drinking water source due to remoteness and TAPS pipeline corridor/industrial use.
Surface Water Ingestion	Pathway Incomplete	Surface water is not utilized as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals. 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 ground water use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

Based on the information available to date, ADEC has determined no further assessment and/or cleanup action is required. There is no unacceptable risk to human health or the environment, and this site will be designated as closed on the Department's database.

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.
3. The three well points will be decommissioned in 2015

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 contact Grant Lidren at (907) 269-8685.

Sincerely,



Grant Lidren
Environmental Program Specialist

CC: Scott Rose, SLR