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: 2264.26.022

July 10, 2015

Scott Benda
City of Valdez
P.O. Box 307
Valdez Alaska 99686

Re: Closure Decision Document: Sea Otter RV Park
Corrective Action Complete Determination

Dear Mr. Benda:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Sea Otter RV Park, located at 2787 South Harbor Road, Valdez, Alaska. 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 no further remedial action will be required at this time.

This decision is based on the administrative record for the Sea Otter RV Park site which is located in the offices of the ADEC in Soldotna, 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.

Site Name and Location:
Sea Otter RV Park
226 South Harbor Drive
Valdez Alaska 99686

Name and Mailing Address of Contact Party:
Scott Benda
City of Valdez
PO Box 307
Valdez Alaska 99686

DEC Site Identifiers:
File No: 2264.26.022
Hazard ID: 25474

Regulatory Authority for Determination:
18 AAC 75 and 18 AAC 78

Property Legal Description:
Tract G, Harbor Subdivision, Valdez Alaska 99686, State of Alaska.

Site Description, Background, and Assessment
The Sea Otter RV Park (ADEC Facility ID #2923) is located at 2787 South Harbor Road on a peninsula of land south of the Valdez marina. Two underground storage tanks (USTs), ADEC Tank ID#s 1 and 2, were part of the former Tesoro Service Station located at an RV Park, which is no longer in operation. The tanks were 5,000 gallons capacity, containing gasoline and diesel, and were installed in 1986. The fuel dispensers were still present at the time of the UST removals.

Contaminants of Concern
'Contaminants of Concern' include any hazardous substances that exceed ADEC's most stringent soil or groundwater cleanup levels. These cleanup levels are designed to be protective of human health exposure pathways in residential settings, where groundwater may be used as a source of drinking water. The following contaminants of concern were identified during the course of the site investigations summarized in the **Site Characterization Activities** section of this decision letter.

- Benzo(a)pyrene

Benzo(a)pyrene was detected in soil at concentrations exceeding the ADEC 'Migration to Groundwater' soil cleanup level in 18 AAC 75.341. DRO was detected in soil at concentrations below the ADEC 'Migration to Groundwater' soil cleanup level in 18 AAC 75.341.

Applicable Soil Cleanup Levels
The soil cleanup level for Benzo(a)pyrene at this site is established in 18 AAC 75.341, Method Two, Table B1 and Table B2, over 40 inches of average annual precipitation. The cleanup level for Benzo(a)pyrene in Table B1 is based on 'Direct Contact'.

Benzo(a)pyrene	0.4 mg/kg

The Table B2 'Migration to Groundwater' soil cleanup levels are not applicable because the 'Migration to Groundwater' soil cleanup level is established to protect groundwater for use as drinking water. Groundwater in the shallow aquifer at this site is not considered to be a source of drinking water as it is tidally influenced.

Applicable Groundwater Cleanup Levels
ADEC 18 AAC 75.345, Table C groundwater cleanup levels apply at a site if the current use, or the reasonably expected potential future use, of the groundwater is drinking water. The shallow aquifer affected at this site is not considered to be a current or potential future source of drinking water; therefore the ADEC Table C Groundwater Cleanup Levels are not applicable.

Site Characterization Activities

The fuel dispenser was removed on August 24, 2009. Soil samples were collected from the dispenser island area. Samples were analyzed for gasoline range organics (GRO) and BTEX by method 8260B, diesel range organics (DRO) by method AK102, and PAHs by EPA 8270C SIM. No fuel piping runs were associated with the USTs, so no piping run samples were collected.

The diesel tank was removed on August 25, 2009. The gasoline tank was removed on August 26, 2009. Headspace samples were collected and screened with a photo ionization detector (PID). Screening samples were collected from approximately every 10 cubic yards (CY) of stockpiled soil.

Approximately 90 CY of soil impacted with hydrocarbons were transported to the Valdez Bailer Facility where they were stockpiled to be used for landfill cover material. Laboratory samples from the contaminated soil stockpile did not detect contamination above ADEC's most stringent soil cleanup levels.

Excavation base and sidewall samples had no detectable concentrations of BTEX, GRO or DRO compounds. One sample from the east end sidewall at the diesel tank had benzo(a)pyrene at 0.984 mg/kg. This was the only excavation sample of the thirteen excavation soil samples that exceeded the applicable soil cleanup level. This contamination is considered de-minimis.

Two samples were collected from the clean soil stockpile. Neither of these samples had detectable hydrocarbon compounds. This material was placed back into the open excavation as fill.

Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), when detectable contamination remains on-site, 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.

Based on a review of the environmental data, ADEC has determined that residual contaminant concentrations do not pose an unacceptable cumulative human health risk.

Exposure Pathway Evaluation

Following site characterization and release investigation work 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 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	Residual soil contamination does not exceed the ADEC 'direct contact' soil cleanup level.
Sub-Surface Soil Contact	De-minimis Exposure	Residual soil contamination does not exceed the ADEC 'direct contact' soil cleanup level.
Inhalation – Outdoor Air	Pathway Incomplete	ADEC has no Outdoor Inhalation soil cleanup level for benzo(a)pyrene, due to its low volatility.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Benzo(a)pyrene is not a volatile chemical, and has no potential to migrate from subsurface soil to indoor air.
Groundwater Ingestion	Pathway Incomplete	The affected groundwater is not used for drinking water. This facility obtains drinking water from the City of Homer. Water is trucked in and stored in a 1,000-gallon aboveground water storage tank.
Surface Water Ingestion	Pathway Incomplete	There is no potential to contact surface water.
Wild Foods Ingestion	Pathway Incomplete	The residual sub-surface contamination has no potential to contaminate wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	The residual sub-surface contamination has no potential to contact ecological receptors.

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.

ADEC Decision

Based on the environmental characterization and cleanup work completed at this site, ADEC has determined that the residual contamination doesn't pose an unacceptable risk to human health or the environment. Therefore, we are issuing this Corrective Action Complete determination, subject to the following condition:

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.

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

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as *'Cleanup Complete'*, and will include a description of the contamination remaining at the site.

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 Closure Decision Document, you may contact me at (907) 262-3412, or via e-mail at peter.campbell@alaska.gov

Sincerely,

Peter Campbell
Environmental Program Specialist