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: 2245.38.042

October 23, 2015

Ms. Denise Stupnicki
Safeguard Properties
7877 Safeguard Circle
Valley View, OH 44125

Re: Decision Document; Residence – 22200 E Snowball Drive
Cleanup Complete Determination

Dear Ms. Stupnicki:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Residence – 22200 E Snowball Drive site located in Wasilla, 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.

This decision is based on the administrative record for the Residence – 22200 E Snowball Drive 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.

Introduction

Site Name and Location:
Residence
22200 E Snowball Drive
Wasilla, Alaska, 99645

Name and Mailing Address of Contact Parties:
Ms. Denise Stupnicki
Safeguard Properties
7877 Safeguard Circle
Valley View, OH 44125

ADEC Site Identifiers
File: 2245.38.042
Hazard ID: 26318

Regulatory authority under which the site is being cleaned up:
18 AAC 78 and 18 AAC 75

Background

In May 2014 it was reported that there had been a previous release of an unknown amount of heating oil from a 275-gallon above ground heating oil tank at a residence at 22200 E Snowball Drive. The release appeared to come from the outlet of the supply line and may have been due to a missing or broken fuel filter.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for diesel range organics (DRO), gasoline range organics, (GRO), and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminants of Concern were detected above cleanup levels in soil.

- DRO

Cleanup Levels

Soil cleanup levels for this site are established in 18 AAC 75.341, Tables B1 and B2:

Contaminant	*Site Cleanup Level (mg/kg)*
• DRO	250

Groundwater was not encountered during excavation activities, and reportedly lies deeper than 100 feet below ground surface.

Site Characterization and Cleanup Activities

Contaminated soils were identified in May 2014 in association with a leaking 275-gallon heating oil aboveground storage tank (AST). Nortech Environmental was contracted to conduct and oversee the excavation of contaminated soils identified at the property. Approximately 34 cubic yards of contaminated soil was removed by Nortech's sub-contractor and taken to Alaska Soil Recycling (ASR). Following the excavation, six soil samples were taken at various depths from the sidewalls and bottom of the excavation pit, five of these samples were below the ADEC soil cleanup levels. The sixth sample (sample number CS-32) was above the cleanup level at 4,840 mg/kg DRO. Nortech did not submit samples for gasoline range organics (GRO), or benzene, toluene, ethylbenzene, and xylenes (BTEX), as required by the ADEC.

Following the excavation 100 pounds of high-nitrogen quick-release fertilizer was added to the excavation and nutrient addition ports were installed in the excavation area, in case additional fertilizer would be desired after the backfill.

In 2015 BGES was contracted to evaluate and remediate the remaining contamination at the site. Remediation activity began in August 2015 at which time the nutrient addition ports were removed, and approximately nine

cubic yards of contaminated soil was removed. All soil removed from the excavation was immediately placed into supersacks for disposal off site. A total of nine supersacks (13.86 tons) were filled and transported to ASR in Anchorage, AK on August 21, 2015.

BGES collected five soil samples (including a duplicate sample) at various depths and geographically diverse portions of the newly excavated area, including areas assumed to be down gradient of the original spill location. Soil samples were analyzed for GRO, BTEX, and RRO. In addition one sample was also analyzed for polynuclear aromatic hydrocarbons (PAHs). All analytes in each soil sample were either non-detect, or below the ADEC cleanup criteria.

Cumulative Risk Calculation

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 at this site was calculated assuming a residential land use and using the most recent detected concentrations of contaminants.

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

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: 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	Pathway Incomplete	Contaminated soil was removed from the surface during the 2015 excavation.
Sub-Surface Soil Contact	De Minimis Exposure	Contaminant concentrations remaining in subsurface soil are below direct contact cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	Contaminant concentrations remaining in subsurface soil are below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Contaminant concentrations in groundwater are below vapor intrusion action levels and the remaining contamination is covered by clean fill
Groundwater Ingestion	Pathway Incomplete	Monitoring wells show that contamination is below ADEC cleanup levels
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.

Exposure to Ecological Receptors	Pathway Incomplete	Ecological receptors are not likely to come into contact with subsurface contamination remaining 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 groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be issued a Corrective Action Complete determination 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. (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.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above.

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, 555 Cordova Street, Anchorage, Alaska 99501, 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 the ADEC project manager, Chelsy Passmore at (907) 269-7522.

Approved By,

Chelsy M Passmore

Chelsy Passmore
Environmental Program Specialist