



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: 2100.26.584

March 25, 2016

Jason Hodges
8123 LLC
7941 Sandlewood Place
Anchorage, AK 99507

Re: Decision Document: Commercial Property – 8123 Hartzell Road USTs 1 & 2
Corrective Action Complete Determination

Dear Mr. Hodges:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the referenced 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:

Commercial Property – 8123 Hartzell Road
USTs 1 & 2
8123 Hartzell Road
Anchorage, AK 99507

Name and Mailing Address of Contact Party:

Jason Hodges
8123 LLC
7941 Sandlewood Place
Anchorage, AK 99507

DEC Site Identifiers:

File No: 2100.26.584
Hazard ID: 26267

Regulatory Authority for Determination:

18 AAC 75 and 18 AAC 78

Site Description and Background

Two 2,000 gallon diesel Underground Storage Tanks (USTs), registered as ADEC facility 770 (tanks 1 & 2), and their associated piping and dispensers were removed in 1999 without any assessment sampling. A subsurface investigation conducted in May 2014 to support refinancing of the property by the current owner discovered Diesel Range Organic contamination up to 2,480 mg/Kg, and Benzene up to .0559 mg/Kg in the soil.

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)
- Benzene

Cleanup Levels

The most restrictive migration to groundwater soil cleanup levels apply to this site due to the groundwater seeps observed in the excavation sidewalls, and static groundwater at 5 feet below ground surface (bgs). Benzene was detected in soil above the approved Method 2 migration to groundwater level for the under 40-inch precipitation zone, established in 18 AAC 75.341(c), Table B1. DRO was detected in soil above the migration to groundwater levels established in 18 AAC 75.341 (d), Table B2.

DRO and Benzene also exceeded 18 AAC 75.341 Table C groundwater cleanup levels.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)	Groundwater (mg/L)
Benzene	.025	.005
DRO	250	1.5

mg/kg = milligrams per kilogram
mg/L = milligrams per liter

Characterization and Cleanup Activities

Release investigation and corrective action activities conducted under the regulatory authority of the Contaminated Sites Program began in 2014. These activities are described below.

ADEC was notified of the contamination found in the May 2014 subsurface investigation. A site assessment under 18 AAC 78.090 was completed in July 2014. 250 cubic yards of contaminated soil was excavated. The excavation went to 14 feet bgs, where groundwater seeps were observed in the sidewalls. ADEC concluded in September 2014 that the July 2014 site assessment was not conducted in accordance with requirements of the approved June 27, 2014 work plan and requested a corrective action plan. In October and November 2014, a final removal action was completed where the site was over excavated and sampled until samples returned showing benzene levels at non-detectable levels, and DRO at 83.8 mg/Kg. All other contaminants were non-detect. 180 cubic yards of potentially impacted soil was transported and thermally treated following the third round of excavation. Once thermally treated, it was approved on December 3, 2014 to be reused as back fill at the site.

Since groundwater seeps were encountered and groundwater in the excavation sat at 5 feet bgs in October 2014, ADEC requested that long term monitoring wells be installed to evaluate the groundwater for potential contamination. In January 2015, three monitoring wells and one piezometer were installed. Groundwater monitoring was completed in February, May, August and November 2015. DRO was present above ADEC cleanup levels in MW-2 once in the May 2015 sampling event (1.60 J), while benzene was detected once above ADEC cleanup levels in MW-1 in August 2015 (.0059 mg/L). All other contaminants

Commercial Property – 8123 Hartzell Road US1's 1 & 2

were non-detect. The last sampling event in November 2015, found all contaminants at non-detectable levels except DRO which was detected, but below ADEC cleanup levels (1.10 mg/L in MW-1). In January 2016, ADEC concurred that groundwater monitoring at the site was no longer needed and requested a well-decommissioning work plan. In March 2016, ADEC received confirmation that the wells had been decommissioned.

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 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 soil was removed and thermally treated. Site was also repaved.
Sub-Surface Soil Contact	Pathway Incomplete	Contaminated soil was removed and thermally treated. Site was also repaved.
Inhalation – Outdoor Air	Pathway Incomplete	Contaminated soil was not over outdoor inhalation levels. It was also removed and thermally treated.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Groundwater contamination levels were consistently non-detect or below ADEC cleanup levels.
Groundwater Ingestion	De-Minimis Exposure	Groundwater contamination were consistently non-detect or below ADEC cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Surface water is not contaminated.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Groundwater contamination levels were consistently below ADEC cleanup levels.

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.

ADEC Decision

Remaining DRO contamination in soil and groundwater 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.
3. Groundwater in the state of Alaska is protected for aquaculture use. In the event that an aquaculture facility uses groundwater from this site in the future, additional testing may be required to ensure that aquatic life criteria under 18 AAC 70 are not exceeded.

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 99811-1800, 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 99811-1800, 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) 269-2021.

Sincerely,



Lisa Griswold
Environmental Program Specialist

Electronic cc: Lisa Ebbs, Midnight Sun Environmental, LLC

Attachment: Site Figure, courtesy of Midnight Sun Environmental, LLC

