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: 2100.38.435

Return Receipt Requested
Article No.: 7016 2070 0000 6898 7735

January 4, 2017

Pamela Wendt
Kenco, Inc.
3732 East Kachina Drive
Phoenix, AZ 85044

Re: Decision Document: Contech Construction Products, Inc.
Cleanup Complete Determination
Hazard ID: 4075

Dear Ms. Wendt:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Contech Construction Products, Inc. site, located in Anchorage, 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 unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Contech Construction Products, Inc. site, which is located in the ADEC office in Anchorage, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:
Contech Construction Products Inc.
111 West 100th Avenue
Anchorage, AK

Name and Mailing Address of Contact Party:
Pamela Wendt
Kenco, Inc.
3732 East Kachina Drive
Phoenix, AZ 85044

DEC Site Identifiers:
File No: 2100.38.435
Hazard ID: 4075

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background

In March 2003, a Limited Phase II Environmental Site Assessment (ESA) was completed on the subject property which identified potential environmental concerns on the subject property. Nine soil borings and five temporary monitoring wells were drilled/installed during the Phase II ESA. The samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), benzene, toluene, ethylbenzene and xylenes (BTEX), and volatile organic compounds (VOCs). Two surface areas of the subject property were identified to be impacted by petroleum hydrocarbons associated with the end rolling equipment and a culvert discharge area located on the site. Soil samples from the borings did not contain concentrations of contaminants above applicable cleanup levels. One groundwater sample contained DRO (1.59 mg/L) above the applicable ADEC cleanup level of 1.5 mg/L next to the location of the end rolling equipment.

In October 2004, approximately 168 tons of visibly contaminated soils were excavated from the previously identified surface contaminated area near the end rolling equipment and transported for treatment at Alaska Soil Recycling (ASR). The excavation was field screened and five samples were collected from the limits of the excavation. The excavation samples were analyzed for GRO, DRO, RRO, VOCs, and RCRA metals. One excavation sample (SS4) contained 644 mg/kg DRO which is above the migration to groundwater ADEC cleanup level of 250 mg/kg, and below the maximum allowable concentration of 12,500 mg/kg. The area near SS4 could not be further excavated due to the presence of buried fiber optic line.

In September 2011, additional soil and groundwater sampling was conducted. Approximately 5 cubic yards of contaminated soil was excavated and stockpiled onsite from the culvert discharge area identified in 2003. Soil samples were collected from the excavation and stockpile and sampled for DRO, RRO, VOCs and polynuclear aromatic hydrocarbons (PAH's). Results from the stockpile and excavation did not contain contaminant concentrations above ADEC cleanup levels. Three soil borings were advanced and completed as monitoring wells in the area of the end rolling equipment, former dip tank and the culvert discharge area respectively. The soil boring samples were analyzed for DRO, RRO, VOCs and PAHs. One soil sample (0-2 feet below ground surface) from the boring next to the former dip tank identified trichloroethylene (TCE) exceeding ADEC cleanup levels although the extent of contamination appeared to be limited to the surface soil because boring samples below the surface sample did not detect TCE. Groundwater samples were collected from the three monitoring wells and analyzed for DRO, RRO, VOCs and PAHs. RRO was detected at 1.19 mg/L in one of the wells (B11MW) just above ADEC cleanup levels (1.1 mg/L). It is noted that a duplicate sample of B11MW did not contain DRO (0.926 mg/L) in excess of the applicable cleanup level. All other samples were below ADEC cleanup levels.

In December 2012, approximately 5 tons of surface soil was excavated in the area previously identified with limited TCE contamination. The soils were analyzed for VOC's only and the groundwater sample was analyzed for RRO only. Excavation confirmation sampling did not exhibit detectable concentrations of TCE. The excavated soil was disposed at of the Anchorage Regional Landfill. One groundwater well (B11MW) was sampled detected RRO (1.73 mg/L) at concentrations above ADEC cleanup levels (1.1 mg/L).

In November 2014, groundwater samples were taken from 4 monitoring wells (B10MW, B11MW, B12MW, and B13 MW) on the subject property. The samples were analyzed for GRO, DRO, RRO, VOCs and PAHs. RRO was detected (1.21 mg/L) in well B11MW at concentrations above ADEC cleanup levels (1.1 mg/L). All other results were below ADEC cleanup levels. Subsequent to this report monitoring wells B10MW and B12MW were decommissioned due to the fact that they never had exceedances of contaminants throughout the sampling history.

In July and September 2016, the two remaining groundwater monitoring wells, B11MW and B13MW, were sampled for DRO and RRO. The monitoring well B11MW was sampled in duplicate and all results were below ADEC cleanup levels.

Contaminants of Concern

During the course of the investigations at this site, soil and groundwater samples were analyzed for GRO, DRO, RRO, VOCs PAHs, and RCRA metals. Based on these analyses, the following contaminants of concern were identified in groundwater.

- Residual Range Organics (RRO)

Also based upon these analyses, the following contaminants of concern were identified in soil:

- Diesel Range Organics (DRO)
- Trichloroethylene (TCE)

Cleanup Levels

Groundwater cleanup levels for this site are established in 18 AAC 75.345, Table C

Contaminant	*Site Cleanup Level*
• RRO	1.1 mg/L

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

Contaminant	*Human Health Cleanup Level*	*Migration to Groundwater Cleanup Level*
• TCE	4.9 mg/kg	.011 mg/kg

Contaminant	*Ingestion*	*Inhalation*	*Migration to Groundwater*	*Maximum Allowable*
• DRO	10,250 mg/kg	12,500 mg/kg	250 mg/kg	12,500 mg/kg

Characterization and Cleanup Activities

From 2003 to 2016 soil and groundwater samples from this site have been collected and analyzed for GRO, DRO, RRO, VOCs, PAHs, and RCRA metals. All of the TCE contaminated soils above ADEC cleanup levels have been excavated and removed from the site and disposed at approved facilities. A limited and relatively small volume of DRO contaminated soil remains onsite near sample location SS4 due to the presence of fiber optic utilities, but is below maximum allowable concentrations and has demonstrated to not be migrating to groundwater.

The only monitoring well that exhibited contamination above ADEC cleanup levels was B11MW. Groundwater samples from monitoring well B11MW have shown levels of RRO that were approaching the ADEC cleanup levels (1.1 mg/L) since 2011. The highest level of RRO in B11MW were measured in 2012 at 1.73 mg/L. RRO levels have diminished since that time and the 2016 sampling effort with duplicate samples taken from B11MW retuned RRO levels below ADEC cleanup levels (below laboratory detection levels).

Sufficient site characterization has been completed and the Contaminated Sites Program has determined through the review of site specific analytical data that as of 2016, RRO, TCE, and DRO are no longer contaminants of concern.

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 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 recently detected concentrations of contaminants in all of the soil and groundwater samples collected.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations meet the human health cumulative risk criteria for residential land use.

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, 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	Contamination is not present above cleanup levels in surface soil (0 to 2 feet below ground surface)
Sub-Surface Soil Contact	Pathway Incomplete	Contamination is not present above cleanup levels in the sub-surface soil (2-15 feet below ground surface)
Inhalation – Outdoor Air	Pathway Incomplete	Contaminant concentrations in soil are below inhalation cleanup levels
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Volatile contaminants capable of causing risk via this pathway are not present above cleanup levels at the site
Groundwater Ingestion	De-Minimis Exposure	Contamination is no longer detected in groundwater samples collected at the site above cleanup levels
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site. Surface water is not believed to have been impacted by this site
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	Ecological receptors are not likely to come into contact with contamination remaining at the site

Notes to Table 2: "De-Minimis Exposure" means that in ADEC's judgment receptors are unlikely to be adversely 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

Soil and groundwater contamination at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This site will receive a "Cleanup Complete" 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 75.325(i). 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 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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) 269-3059, or email at darren.mulkey@alaska.gov.

Sincerely,

Darren Mulkey
Project Manager

Cc: Dan Moody
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West Chester, OH 45069-4987