



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: 2100.26.216

February 17, 2017

Herbert Lee
Transpacific Resources
745 Fort Street #1410
Honolulu, HI 96813

Re: Decision Document: Postal Facility on Arctic Boulevard
Cleanup Complete Determination

Dear Mr. Lee:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Postal Facility on Arctic Boulevard (formerly), located at 3737 (formerly 3719) Arctic Boulevard, Anchorage. 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 Postal Facility on Arctic Boulevard (formerly) 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:

Postal Facility on Arctic Boulevard (formerly)
3737 (formerly 3719) Arctic Boulevard
Anchorage, AK 99503

Name and Mailing Address of Contact Party:

Herbert Lee
Transpacific Resources
745 Fort Street #1410
Honolulu, HI 96813

DEC Site Identifiers:

File No.: 2100.26.216
Hazard ID.: 24016

Regulatory Authority for Determination:

18 AAC 78 and 18 AAC 75

Site Description and Background

A 6,000-gallon gasoline underground storage tank (UST) was installed in 1977 at 3719 Arctic Boulevard in Anchorage (regulated under UST Facility#2051). The tank had no leak detection or overspill protection installed. In 1989, the UST was removed and contamination was noted in the excavation foot print. Since a successful tank tightness test was performed in May of 1989, it was thought that the release occurred due to

overfilling activities, and not failed lines or holes in the tank. The 1989 closure report did not however note the condition of the tank. Confirmation samples documented the presence petroleum hydrocarbons in both the soil and groundwater.

Contaminants of Concern

During the UST removal activities and release investigation and groundwater monitoring at this site, samples were collected from soil and groundwater and analyzed for Total Petroleum Hydrocarbons via EPA Method 418.1, and benzene, toluene, ethylbenzene and xylenes (BTEX) via EPA Method 602 in 1989. Based on these analyses, the following contaminants were detected above applicable cleanup levels and are considered Contaminants of Concern at this site.

- Benzene
- Toluene
- Ethylbenzene
- Xylenes
- Diesel Range Organics (DRO)
- Gasoline Range Organics (GRO)

Cleanup Levels

18 AAC 75.341(c) and (d) Method Two Tables B1 and B2 migration to groundwater soil cleanup levels and 18 AAC 75.345 Table C groundwater cleanup levels are applicable at this site because of the presence of groundwater.

Table 1 – Approved Cleanup Levels

Contaminant	Soil Direct Contact (mg/kg)	Soil Outdoor Inhalation (mg/kg)	Soil Migration to Groundwater (mg/kg)	Soil Human Health (mg/kg)	Groundwater (mg/L)
Benzene	N/A	N/A	0.022	8.1	0.0046
Toluene	N/A	N/A	6.7	200	1.1
Ethylbenzene	N/A	N/A	0.13	35	0.015
Xylenes	N/A	N/A	1.5	57	0.19
DRO	10,250	12,500	250	N/A	1.5
GRO	1,400	1,400	300	N/A	2.2

Notes to Table 1: mg/kg = milligrams per kilogram; mg/L = milligrams per liter; N/A = not applicable

Characterization and Cleanup Activities

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 1989. These activities are described below.

The UST was removed in 1989. Approximately 80 cubic yards of soil was removed, stockpiled on site, and eventually disposed of at Anchorage Regional landfill in 1990. The final excavation measured 25 feet long, by 15 feet wide and 8 feet deep. Groundwater was encountered at 6 feet below ground surface (bgs) during excavation. Soil samples taken from the base of the excavation confirmed Total Petroleum Hydrocarbons (TPH) at up to 247 mg/kg, while ponded groundwater that was encountered confirmed that benzene (1.34 mg/L), toluene (19.2 mg/L) ethylbenzene (4.4 mg/L), xylenes (25.5 mg/L) were all present above ADEC cleanup levels.

Over the following years, groundwater monitoring wells were installed in order to delineate and monitor the groundwater contamination, and vapor extraction wells were installed in an attempt to expedite remediation. Three vapor extraction wells were installed in the vicinity of the UST excavation in April 1991 (V1 through V3). Four monitoring wells (MW1 through MW4) were installed in August 1990; two monitoring wells (MW5 and MW6) were installed in December 1990; one monitoring well (MW7) was installed in April 1991; and two monitoring wells (MW8 and MW9) were installed in December 1991.

Oxygen Release Compound socks were proposed as part of an interim corrective action plan in October 2002, and socks were deployed in MW2, MW3, MW4, MW7 and MW8 from October 31, 2003 to November 30, 2005. Groundwater monitoring conducted from 1990 to 2016 with a total of 18 events showed a decreasing trend of contaminant concentrations in groundwater, with the last contaminant concentration detected above ADEC cleanup levels in 2009 (0.00638 mg/L benzene in MW7). Three groundwater monitoring events took place in 2014 and 2016 with no contaminant concentrations present above ADEC cleanup levels.

The highest levels of contaminants detected in soil were in 1990 with TPH at 626 mg/kg at 11.5 feet bgs during the installation of MW3, with no contamination detected below this depth; benzene at 0.813 mg/kg in 1991 during the drilling of V-3 at 13 feet bgs; and 4,430 mg/kg DRO and 1,200 mg/kg GRO in 1996 in a soil boring adjacent to MW3 at 8 feet bgs, also with no contamination detected below this depth.

Since a document search could not reveal the fate of vapor extraction wells V1, V2, V3 or monitoring wells MW1, MW5, MW6, or MW9, ADEC requested that a good faith effort be made to locate the wells on site and decommission them in November 2016. A magnetometer, hand tools and visual observations were used during the search in order to identify the wells. The search revealed two of the missing seven wells: MW5, and MW9. A total of seven groundwater monitoring wells (MW2, MW3, MW4, MW5, MW7, MW8, and MW9) were then decommissioned on December 9, 2016 in accordance with their approved well decommissioning work plan.

The soil contaminant concentrations detected in 1990, 1991, and 1996 were collected within the zone that made contact with groundwater and are above ADEC Migration to Groundwater cleanup levels. However, since groundwater is no longer contaminated, it is presumed that these soil concentrations have attenuated over time or are no longer leaching. Since the last known levels of soil contamination are below direct contact, inhalation or human health levels set out in 18 AAC 75.341(c) and (d), ADEC believes this site is eligible for cleanup complete without institutional controls.

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 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, 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	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is below ingestion and human health cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below inhalation and human health cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Volatile contaminants are all below ADEC cleanup levels.
Groundwater Ingestion	De-Minimis Exposure	Contamination in groundwater is no longer above ADEC cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Surface water was not contaminated and is not used as a drinking water source in the vicinity of the 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	Contamination is no longer above ADEC cleanup levels. Site is also covered with pavement.

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. “Exposure Controlled” means there is an institutional control in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

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 78.600(h). A “site” [as defined by 18 AAC 78.995(134)] 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.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

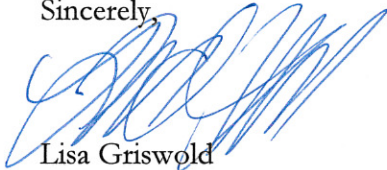
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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, PO Box 111800, 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, or email at lisa.griswold@alaska.gov.

Sincerely,



Lisa Griswold
Project Manager

Electronic cc: Spill Prevention and Response, Cost Recovery Unit