



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: 2268.38.001

June 28, 2018

Mr. Scott Breitsprecher  
Residence – Willow HHOT  
18950 Chrystal Island Drive  
Eagle River, Alaska 99519-6650

Re: **Decision Document: Residence – Willow HHOT  
Cleanup Complete Determination**

Dear Mr. Breitsprecher:

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program (CSP), has completed a review of the environmental records associated with the Residence – Willow HHOT site located at 20657 West River-Aire Drive in Willow, 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 Residence – Willow HHOT, 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:**

Residence – Willow HHOT  
20657 West River-Aire Drive  
Willow, AK 99688

**Name and Mailing Address of Contact Party:**

Mr. Scott Breitsprecher  
18950 Chrystal Island Drive  
Eagle River, AK 99519-6650

**DEC Site Identifiers:**

File No.: 2268.38.001  
Hazard ID.: 3176

**Regulatory Authority for Determination:**

18 AAC 75

**Site Description and Background**

In October 1999, approximately 300 gallons of home heating oil was spilled from an aboveground storage tank (AST) that fell off of its stand after being completely filled. The ADEC Prevention Preparedness and Response Program (PPRP) mobilized to the property and approximately 40 cubic yards of petroleum

contaminated soil was excavated and placed in stockpiles on two liners. Excavation ceased when the foundation surrounding a mobile home on the property became unstable, and the excavation was filled in with clean fill.

### **Contaminants of Concern**

During the site characterization and cleanup activities at this site, samples were collected from soil, and analyzed for gasoline range organics (GRO), diesel range organics (DRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs). Based on these analyses, no contaminants were detected above the ADEC Migration to Groundwater (MTGW) cleanup levels established in 18 AAC 75.341 (d), Table B2.

### **Characterization and Cleanup Activities**

Following the 1999 soil excavation PPRP conducted a site visit in 2000. It was noted that staining still existed on the trailer edge of the filled excavation, both stockpiles were covered, and the stream located 100 feet north of the property did not contain a sheen. In 2003 the site was transferred to the CSP for long term management.

CSP staff conducted a site visit in 2005 noting only one stockpile remained and the mobile home was gone. The existing stockpile did not contain noticeable hydrocarbon odors in the top 8 inches of soil. Staff investigated the area where the second pile may have been spread during the mobile home removal and did not observe any hydrocarbon odors. A petroleum sheen was not observed in the stream.

A site characterization effort conducted in 2017 included the collection of seven analytical soil samples from the remaining stockpile and five test pits. Five soil samples collected from the test pits at the groundwater interface 4 to 6 feet bgs did not contain containment concentrations above the ADEC MTGW cleanup levels. Two soil samples collected two feet into the stockpile did not contain containment concentrations above the ADEC MTGW cleanup levels.

### **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 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	De-Minimis Exposure	Contaminant concentrations remaining on site are below human health and ingestion cleanup levels.
Sub-Surface Soil Contact	De-Minimis Exposure	Contaminant concentrations remaining on site are below human health and ingestion cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contaminant concentrations remaining on site are below human health and inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Contaminant concentrations remaining are below ADEC's most stringent cleanup levels and no further vapor intrusion investigation is warranted
Groundwater Ingestion	De-Minimis Exposure	Contaminant concentrations remaining on site are below ADEC MTGW cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminant concentrations remaining do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	De-Minimis Exposure	Contaminant concentrations remaining on site are below ADEC's most stringent cleanup levels and is not expected to affect ecological receptors.

**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 contamination at the site has 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.
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 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, 555 Cordova Street, Anchorage, Alaska 99501-2617, within 20 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, P.O. 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) 269-7522, or email at [Chelsy.Passmore@alaska.gov](mailto:Chelsy.Passmore@alaska.gov).

Sincerely,

*for*   
Chelsy Passmore  
Project Manager