



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of
Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 2264.38.036

April 8, 2019

Larry Weaver
Public Works Director
City of Valdez
P.O. Box 307
Valdez, Alaska 99686

Re: City of Valdez Public Library, ADEC Hazard ID #25484
Cleanup Complete Determination

Dear Mr. Weaver:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the City of Valdez Public Library. 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 City of Valdez Public Library, which is located in the ADEC office in Soldotna, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

City of Valdez Public Library
260 Fairbanks Drive
Valdez, Alaska 99686

Name and Mailing Address of Contact Party:

Mr. Larry Weaver
Public Works Director, City of Valdez
P.O. Box 307
Valdez, Alaska 99686

DEC Site Identifiers:

File No.: 2264.38.036
Hazard ID.: 25484

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

The Valdez Public Library (Figure 1 – Site Location Map) had an unregulated 1028 gallon underground heating oil tank removed in August of 2009. Approximately 20 cubic yards of material was excavated during the removal of the underground storage tank (UST). Confirmation samples collected from the sidewall of the excavation showed elevated levels of diesel range hydrocarbons in two of six samples collected.

The two samples that contained elevated hydrocarbons were located on the eastern side of the excavation adjacent to the library building foundation, which made further soil removal impractical. The diesel range organics had diminishing concentrations with depth and have not impacted groundwater.

Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil and groundwater which were analyzed for analyzed for the following compounds

- Diesel Range Organics (DRO)
- Gasoline Range Organics (GRO)
- Benzene, Toluene, Ethylbenzene and Xylenes (BTEX)
- Polynuclear Aromatic Hydrocarbons (PAH)
- Volatile Organic Compounds (VOC)

Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Diesel Range Organics (DRO)

Cleanup Levels

The Human Health cleanup levels (18 AAC 75.340 Table B2) apply to this site for the over 40 inches of precipitation zone. DRO was detected in soils above levels established in Table B2. Sufficient site characterization has been completed and ADEC has determined that residual contaminants in soil have achieved steady-state equilibrium and will not migrate to groundwater.

Table 1 – Approved Cleanup Levels

| Contaminant | Soil, Alternative Migration to Groundwater (mg/kg) | Soil, Human Health (mg/kg) | Groundwater Cleanup Level (mg/l) |
|-------------|--|----------------------------|----------------------------------|
| DRO | 230 | 8,250 | 1.5 |

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

Characterization and Cleanup Activities

On August 27, 2009 a 1028 gallon unregulated heating oil tank was removed from the ground at the Valdez Public Library. Approximately 20 cubic yards (cy) of hydrocarbon impacted soil was removed from the ground and transferred to the City of Valdez Bailer Facility.

Six confirmation samples were collected from the excavation. Two of the six samples from the eastern side of the excavation were above the most stringent Method Two Cleanup Level (250 mg/kg) from DRO contamination. The two impacted soil samples were from the eastern side of the excavation at 5.5 and 7.5 feet below ground level (bgl), where further excavation was constrained by the library building. Sample B004SO at 5.5 feet bgl had DRO at 3,910 mg/kg. Sample B001So at 7.5 feet bgl (excavation base) had DRO at 1,990 mg/kg. All other parameters were either absent or well below the most conservative cleanup levels (Figure 2 – Excavation Map). Petroleum impacted soils near the surface were removed during the storage tank excavation. This eliminated the direct contact exposure pathway except during future excavation activities.

Hydrocarbon impacted soils removed from the excavation were transferred to the Valdez Bailer Facility for storage and land farming. The stockpile was sampled in 2013 and met the most stringent cleanup requirement, and was disposed of in the landfill.

Vapor intrusion risk is low for subsoils at the library. PAH and VOC compounds detected that are volatile (chrysene and pyrene) were detected at 1/10 of the cleanup level. The risk of outdoor air inhalation is similarly low as the excavation was backfilled with clean soil to seven feet below ground level.

In 2013 two monitoring wells were installed to supplement groundwater data gathered from two observation wells located near the former tank. Groundwater is approximately 13 feet below ground level at the site. BTEX, GRO and DRO were not detected. Trace levels of PAH compounds were detected in groundwater samples. There are no private water wells in the vicinity of the site. The four site wells were decommissioned in April of 2015.

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.



DATE: OCT. 2009
 CHKD: J.R.C.
 DRWN: A.C.M.
 PROJ. No.: 36-004
 825 W. 8th Ave., Anchorage,
 AK 99501, (907) 258-4880

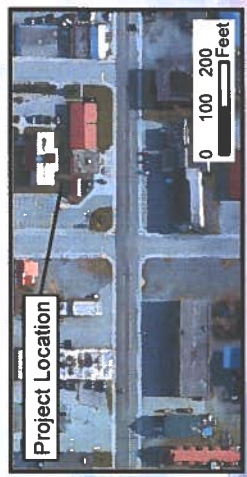


SITE LOCATION MAP

VALDEZ LIBRARY UST REMOVAL
 Valdez, Alaska

FIGURE

1



VALDEZ CITY LIBRARY

EXCAVATION LIMIT

FORMER UST

09VDZLIB003SO
DRO = 75.4

09VDZLIB001SO
DRO = 1,990

09VDZLIB002SO
DRO = ND (21.5)

09VDZLIB004SO
DRO = 3,910

09VDZLIB006SO
DRO = ND (21.4)

09VDZLIB005SO
DRO = 24.5



DRO SAMPLE RESULTS MEASURED IN mg/kg.

DATE: OCT. 2009
 CHKD: J.R.C.
 DRWN: A.C.M.
 PROJ. No.: 36-004
 825 W. 8th Ave., Anchorage,
 AK 99501, (907) 258-4880



EXCAVATION MAP

VALDEZ LIBRARY UST REMOVAL
 Valdez, Alaska

FIGURE

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 Minimus | Contamination remains in sidewall and close to building foundation at depth. |
| Inhalation – Outdoor Air | Pathway Incomplete | Volatile contaminants that would pose a risk via the inhalation pathway are not present at the site |
| Inhalation – Indoor Air (vapor intrusion) | Pathway Incomplete | Volatile contaminants that would pose a risk via the inhalation pathway are not present at the site |
| Groundwater Ingestion | Pathway Incomplete | No contamination detected above cleanup levels. |
| Surface Water Ingestion | Pathway Incomplete | Surface water is not used as a drinking water source in this area |
| Wild and Farmed Foods Ingestion | Pathway Incomplete | Area not used for food gathering. |
| Exposure to Ecological Receptors | Pathway Incomplete | Ecological receptors are not present 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. “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

Petroleum contamination remains in sub-surface soil above levels suitable for unrestricted future use; however ADEC has approved no further remedial action. The concentrations in soil are above the migration to groundwater cleanup level, but there is no evidence that groundwater has been impacted. Contamination in soil meets Human Health cleanup levels. It appears that the hydrocarbon contamination is limited in extent. 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 from a site that is subject to the site cleanup rules or for which a written determination from the department has been made under 18 AAC 75.380(d)(1) that allows contamination to remain at the site above method two soil cleanup levels or groundwater cleanup levels listed in Table C requires DEC 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. (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.

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) 262-3412 or email at peter.campbell@alaska.gov.

Sincerely,



Peter Campbell
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit