



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File No: 1513.38.076

January 9, 2013

Via Electronic and Regular Mail

Ms. Lynda Foreman, Manager
Travelodge Hotel
9200 Glacier Highway
Juneau, Alaska 99803

RE: Cleanup Complete with Institutional Controls
Juneau Airport Travelodge Hotel Contaminated Site

Dear Lynda,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with the Travelodge Hotel located at 9200 Glacier Highway in Juneau. Based on the information provided to date, the DEC has determined that the contaminant concentrations remaining on the property do not pose an unacceptable risk to human health or the environment, and no remedial action is required as long as the site is in compliance with established institutional controls (ICs).

This decision is based on the Juneau Airport Travelodge Contaminated Site (Site) administrative record, which is located in the offices of the DEC in Juneau, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Cleanup Complete with ICs determination.

Site Name and Location

Juneau Airport Travelodge UHOT
9200 Glacier Highway
Juneau, Alaska 99801
Airport Acres Block E Lots 6, 7 & 8

Address of Contact Party

Ms. Lynda Foreman, Manager
Travelodge Hotel
Post Office Box 33817
Juneau, AK 99803

DEC Site Identifiers

DEC Reckey: 2000110124101
Hazard ID: 4517
File: 1513.38.076

Regulatory Authority for Determination

Title 18 Alaska Administrative Code 75

Background

The Travelodge Hotel is on a 90,000 square foot property located in a commercial land use district near the Juneau International Airport. Property use north of the property on Lee Smith Drive is residential housing. Although potable wells may exist within one quarter mile, the predominant consumption of drinking water in the area is supplied by the City and Borough of Juneau Public Drinking Water System.

In September 2000, diesel oil from a leaking 600-gallon underground heating oil storage tank (UST) system located on the north side of the Travelodge Hotel entered a storm water sewer that discharged into Duck Creek, an urban anadromous stream. The spread of oil leaking from the UST had reached a sump under the Travelodge building that pumped shallow groundwater out of the crawlspace into piping connected to the storm water sewer. During the next several weeks, sorbent materials were used to recover oil floating on Duck Creek and the storm sewer basin. Substantial amounts of oil were recovered from the UST excavation and the crawlspace sump system under the building using an oil-water separator system.

Characterization and Cleanup Actions

Channel Construction Inc (Channel) excavated the accessible contaminated soil and stored it on-site between liners in a stockpile while the 600-gallon UST system and piping on the north side of the building were removed. Soil contamination extending into the crawlspace could not be reached without endangering the integrity of the building foundation. Channel transported an estimated volume of 160 cubic yards of contaminated soil in the stockpile to the Juneau United Soil Recycling facility where the soil was remediated by thermal treatment. An oil/water separator was added to the crawlspace sump system and is closely monitored by Travelodge maintenance to prevent any future release of oil to the storm water system.

Nortech Environmental Engineering (Nortech) collected eight confirmation samples from residual soil on the perimeter of the excavation at the base of the sidewalls between four and one half feet and seven feet below the surface and two samples from residual soil in the crawlspace one and one half feet below the surface. Samples CL02 and CL03 collected at the building foundation were the only results with levels above the DEC Method Two Migration to Groundwater (M2 MTG) soil cleanup levels listed in Title 18 Alaska Administrative Code (AAC) 75.341 Table B2 for diesel range hydrocarbon (DRO). Table 1 displays the highest levels of DRO detected in soil remaining in the tank excavation and the crawlspace, the depth below the surface each sample was collected and the M2 MTG Cleanup Levels.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
DRO	18,000	CL02 down 7 feet at the building foundation	230
DRO	6,900	TL-CS-02 down 1.5 in the building crawlspace	230

Table 1 the greatest levels of analytes detected in remaining soil at the first UST site in 2000.

In June 2001, Channel removed a second buried heating oil tank that was located on the west side of the building. Although the 1,000-gallon tank was found in good condition when it was excavated, stained soil was discovered around the vent pipe. Channel excavated an estimated volume of 50 cubic yards of diesel contaminated soil and transported it the Juneau United Soil Recycling facility where the soil was

remediated by thermal treatment. A small volume (less than five cubic yards) of contaminated soil in a layer of blue silt at the base of the tank excavation next to the building foundation was left to protect the structural integrity of the building. Table 2 displays the results for the highest level of DRO detected in one of six samples collected at the base of the sidewalls of the excavation. DRO levels in the other five samples were below the soil cleanup level.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
DRO	680	TL02-03 at 10.5 feet	230

Table 2 the greatest levels of analytes detected in remaining soil at the second UST site in 2001.

Residual soil contamination at this second UST source area is unrelated to the petroleum release from the UST located on the north side of the building. The Department evaluation of this source area has determined that all exposure pathways are incomplete and the volume of soil above the DRO cleanup level is de minimis. No additional investigation or cleanup is necessary at this location on the property.

Remediation Plan

The surface area of contaminated soil in the crawlspace was estimated at 400 square feet and the depth from the surface to groundwater was estimated at two feet. The Nortech in-situ soil treatment plan approved by DEC included installation of a perforated piping system with vertical ports to facilitate periodic addition of soil amendments and to circulate air to subsurface soil. The air and nutrients promote microbial breakdown (enhanced natural attenuation) of the remaining diesel contamination. A polyethylene membrane limits migration of petroleum vapors from the soil into the crawlspace air. During heavy rainfall events, groundwater rises near the surface in the crawlspace. A sump pump maintains a groundwater level below the bottom of the aeration piping and the vapor barrier. Sorbent pads are used in the oil-water separator in the sump piping to capture floating oil before it reaches the storm water sewer system.

Remedial Assessment

The first remedial assessment of soil in the crawlspace at the north end of the building took place in August 2009. Nortech advanced soil borings and used field screening readings in six locations to select two sampling locations at a depth of eighteen inches in the crawlspace. In accordance with the approved work plan the samples were analyzed for DRO. The highest level of DRO in soil was 3,260 mg/kg while the other sample and its duplicate had DRO levels of 178 mg/kg and 469 mg/kg. Assessment results indicated that the soil amendment and aeration treatment was reducing DRO levels in the shallow surface material in the crawlspace (within six inches depth), but the deeper material (twelve inches depth) remained contaminated with DRO. Volatile hydrocarbon compounds benzene, toluene, ethylbenzene and total xylenes (BTEX) were added to the analyte list in the work plan for the next sampling event. Table 3 displays the result for the highest level of DRO detected soil in the crawlspace.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
DRO	3,260	TL-03 at 1.5 feet	230

Table 3 the greatest levels of analytes detected in remaining crawlspace soil at the site in 2009.

The second remedial assessment of soil in the crawlspace took place in July 2010. Nortech collected three soil samples and a field duplicate two feet below the surface. In accordance with the modified work plan the samples were analyzed for DRO and BTEX compounds. The DRO levels for sample CM101 and its duplicate CM102, CM103 and CM 104 were 6,560 mg/kg, 7,190 mg/kg, 2,490 mg/kg and 2,480 mg/kg respectively. The results indicated the soil treatment was slower in reducing DRO in the deeper soil closer to the groundwater table. The BTEX compound levels detected in the samples were all below instrument detection or below the applicable cleanup levels. The Remediation Plan was modified to include the addition of water after the soil amendments to improve distribution throughout the contaminated soil layer. Table 4 displays the applicable M2 MTG Table B1 and B2 Cleanup Levels for the site, the depth the samples were collected and results for the highest level of analytes detected in soil in the crawlspace.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
DRO	7,190	CM102 at 2 feet	230
Benzene	<0.00796	CM102 at 2 feet	0.025
Toluene	<0.0159	CM102 at 2 feet	6.5
Ethylbenzene	<0.0159	CM102 at 2 feet	6.9
Total Xylenes	0.725	CM102 at 2 feet	63

Table 4 the greatest levels of analytes detected in remaining crawlspace soil at the site in 2010.

The third remedial assessment of soil in the crawlspace took place in September 2012. Nortech collected two soil samples and a field duplicate for laboratory analysis for DRO and residual (RRO) range hydrocarbons and BTEX compounds. RRO analysis was added by Nortech. Results indicate improved reduction in DRO levels in the deeper soil layer just above the groundwater table in the crawlspace soils. Table 5 displays the applicable M2 MTG Table B1 and B2 Cleanup Levels for the site, the depth the samples were collected and results for the highest level of analytes detected in soil in the crawlspace.

Hydrocarbon range and compounds of concern	Greatest level in soil mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg
DRO	2930	TS-1 at 1 foot	230
RRO	386	TS-dup at 1.5 feet	9,700
Benzene	<0.0115	TS-1 at 1 foot	0.025
Toluene	0.073	TS-2 at 0.8 feet	6.5
Ethylbenzene	<0.023	TS-1 at 1 foot	6.9
Total Xylenes	<0.069	TS-1 at 1 foot	63

Table 5 the greatest levels of analytes detected in remaining crawlspace soil at the site in 2012.

In the third remedial assessment two air samples were collected from ambient air in the crawlspace to evaluate the vapor intrusion pathway for the building. Two samples and a trip blank were analyzed for

total petroleum hydrocarbons (TPHd) and volatile organic compounds (VOC) by EPA Method TO-17. Benzene and toluene VOC compounds were determined to be the only site specific contaminants of concern detected in the ambient air samples. Analytical results were compared to the residential Target Levels for Indoor Air in Appendix D of the Vapor Intrusion Guidance for Contaminated Sites dated October 2012 (VIG). Table 6 displays the residential Target Levels for Indoor Air and the highest levels of the VOC analytes detected in the air samples collected in the crawlspace of the building.

Compounds of concern	Greatest level in air (ug/m ³)	Sample name	VIG Cleanup Levels (ug/m ³)
Benzene	0.54	TA-2	3.1
Toluene	1.2	TA-2	5210

Table 6 the greatest levels of analytes detected in crawlspace air samples at the site in 2012.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC'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 1 as Attachment A to this letter.

DEC Decision

DEC has reviewed and approved the site cleanup as protective of human health, safety, welfare and the environment, subject to the institutional control specified in this letter. No further cleanup is necessary at this site unless new information becomes available indicating to DEC that the site may pose an unacceptable risk to human health, safety, welfare or the environment. The property is subject to conditions in order to ensure contamination left onsite remains undisturbed unless a cleanup effort is initiated with the prior approval from DEC. These conditions are as follows:

Any change in land use in the future may impact the exposure assumptions cited in this document. If land use and/or ownership changes, the current ICs may not be protective and so DEC will evaluate the changes and may require additional remediation and/or ICs. Therefore the Travelodge Hotel shall report to DEC every three years to document land use, or report as soon as Travelodge Hotel becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local DEC office or electronically to DEC.ICUnit@alaska.gov.**

- 1) Soil contamination remains in a layer at the water table in the crawlspace of the north end of the building. Attached is a diagram of the property, with location of the former UST in relation to existing structures, the area that has been cleaned up, the approximate location and extent of remaining soil contamination and the locations where confirmation soil samples were collected.
- 2) A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document.

January 9, 2013

3) Installation of groundwater wells will require prior approval from DEC.

The DEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, Institutional Controls will be terminated.

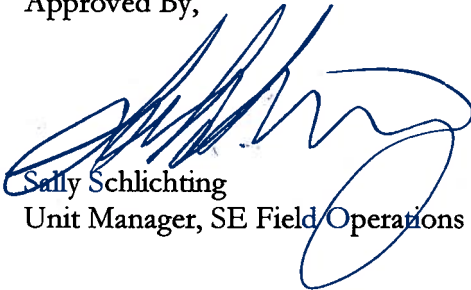
This determination is in accordance with 18 AAC 75.380 and does not preclude DEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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 99801, 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 99801, 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 contact the DEC project manager, Bruce Wanstall at (907) 465-5210.

Approved By,



Sally Schlichting
Unit Manager, SE Field Operations

Recommended By



Bruce Wanstall
Environmental Program Specialist

Attachment A: Table 7 - Exposure Pathway Evaluation

Attachment B: Cleanup Complete-ICs Agreement Signature Page

Attachment C: Site Figure

cc: Tara Martin, Nortech Project Manager, via email
Sally Schlichting, Unit Manager, CS State & Private Program, via email
Evonne Reese, Manager, DEC IC Unit, via email

Attachment A: Exposure Pathway Evaluation

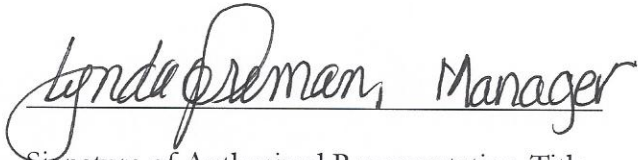
Table 7 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-minimis exposure	Surface soil contamination has been removed and remediated off-site. The soil contamination remaining under building crawlspace is below ingestion cleanup levels.
Sub-Surface Soil Contact	Exposure Controlled	Soil contamination under the foundation wall may exceed human health ingestion levels, but it is beneath the foundation and future excavation is not planned.
Inhalation – Outdoor Air	Pathway Incomplete	All contaminated surface soil outside the structure has been transported off-site and remediated and volatile compounds in remaining soil are below MTG and Inhalation Pathway levels.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	Volatile compound levels in building crawlspace are below the residential indoor air target levels and soil inhalation levels.
Groundwater Ingestion	De-minimis exposure	Groundwater at the site does not influence a current or future drinking water source and was not investigated. The City and Borough of Juneau Public Works supplies potable water to the facility and the general area.
Surface Water Ingestion	Pathway Incomplete	Surface water hydraulically connected to the site is not of sufficient quality or quantity for a potable water source.
Wild Foods Ingestion	Pathway Incomplete	The site and the urban area are not a wild foods harvest area and none of the contaminants have potential to bioaccumulate in flora or fauna.
Exposure to Ecological Receptors	Pathway Incomplete	Highly valued ecological receptors are present in off-site water bodies but the BTEX indicator compounds in soil are below Method Two Table B1 MTG levels.

Notes to Table 1: “De-minimis exposure” means that in DEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in DEC’s judgment contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

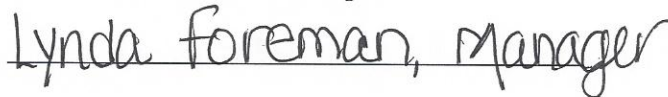
Attachment B: Cleanup Complete-ICs Agreement and Signature Page*

Ms. Lynda Foreman, Manager, agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision Document dated **January 9, 2013** for the Travelodge Hotel. Failure to comply with the terms of this agreement may result in DEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380(d).



Signature of Authorized Representative, Title

Ms. Lynda Foreman, Manager



Printed Name of Authorized Representative, Title

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the DEC project manager at the address on this correspondence within 30 days of receipt of this letter.

DEC File No.	1513.38.076
Hazard ID:	4517
DEC Project Manager:	Bruce Wanstall

For Internal Use Only

***Attention DEC Administration Staff:** Please follow the procedure below after Attachment A is signed/returned to DEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the DEC Project Manager so that the PM can update the CS database.

Attachment C: Site Figure

