

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN, GOVERNOR

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File: #2100.38.418

December 3, 2007

Susan Schrader
Alaska Railroad Corporation
P.O. Box 107500
Anchorage, AK 99510

Re: ARRC Operations Building
Record of Decision

Dear Ms. Schrader:

The Department of Environmental Conservation (ADEC), Contaminated Sites Program has completed review of the *Soil Excavation and Site Assessment Report* prepared by HartCrowser in January 2004 for the excavation of soils associated with the removal of two underground storage tanks (USTs) at the Alaska Railroad Corporation (ARRC) Operations Building. Based on the information provided in this report, ADEC has determined that the soil contamination remaining on site exceeds the most stringent ADEC soil cleanup levels, but does not pose an unacceptable risk to human health or the environment, and the site can be closed subject to the conditions outlined in this document.

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 ADEC determination.

Introduction

Site Name and Location:
ARRC Operations Building
825 Whitney Road
Anchorage, Alaska

Name and Mailing Address of Contact Party:
Susan Schrader
Alaska Railroad Corporation
P.O. Box 107500
Anchorage, Alaska, 99510

Database Record Key and CS file number:

ADEC Reckey # 1991210929801

CS file # 2100.38.418

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

Background

Two tanks were removed from this site in October 1991 including a 3,000-gallon heating oil UST and a 2,500-gallon diesel UST and associated dispenser.

Cleanup Actions

During the initial tank excavation, 20 cubic yards of petroleum impacted soil were excavated and transported to Alaska Soil Recycling (ASR) for thermal treatment. Soil samples taken from the limits of the excavation indicated that total petroleum hydrocarbons were present in concentrations up to 15,300 mg/kg. Benzene was present in one sample at a concentration of 0.035 mg/kg.

In September 2003, an additional excavation was conducted at the former site of the USTs. Guided by field screening with a photoionization detector (PID), approximately 1,337 cubic yards of petroleum impacted soil was removed from around the former USTs and transported to ASR for treatment. Confirmation soil samples taken from the limits of the excavation indicated that diesel range organics (DRO) up to 447 mg/kg and trichloroethylene (TCE) concentrations up to 0.642 mg/kg remained in soil at the site. Excavation stopped at the groundwater interface and no groundwater samples were collected. The excavation was backfilled with a combination of clean fill and treated soil that had been returned by ASR.

The subject property is currently being used as the new Anchorage Operations Center and adjacent parking lot for the Alaska Railroad Corporation.

Contaminants of Concern

- DRO
- TCE

Cleanup Levels

The soil cleanup levels applicable for this site are established under 18 AAC 75.341 Tables B1 and B2 Under 40-Inch zone, migration to groundwater pathway as follows:

DRO – 250 mg/kg
TCE – 0.027 mg/kg

Pathway Evaluation

The human health exposure pathways evaluated at this site include ingestion, inhalation, and migration to groundwater.

The ingestion and inhalation pathways may be complete, but the contaminant concentrations remaining do not exceed inhalation and ingestion cleanup levels.

The migration to groundwater pathway may be complete, but groundwater is not used as a drinking water source at the site and the bulk of contaminated source material has been removed.

The exposure pathway analysis above was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be either De Minimus Exposure or Pathway Incomplete.

ADEC Decision

The information provided to date indicates that the majority of contaminated soil has been removed from the site; however DRO and TCE remain on site above the most stringent ADEC cleanup levels. The impacted soil is covered by clean fill and the area has been paved further reducing the potential for exposure.

Based on the information presented above, ADEC has determined that no further remedial action will be required at this site subject to the following conditions:

1. A Notice of Environmental Contamination will be recorded on the ADEC database to document that there is residual contamination remaining on site above the most stringent ADEC cleanup levels;
2. Any proposal to transport soil off site requires ADEC approval in accordance with 18 AAC 78.274(b)

This determination is in accordance with 18 AAC 75.380(D) (2) and does not preclude ADEC 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.

Final site closure will be considered following confirmation that all soil above the established cleanup levels has been removed and properly treated.

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 Bill O'Connell at (907) 269-3057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Frechione".

Jim Frechione
Environmental Manager