

STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

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File: 2114.38.001

October 13, 2008

City of Whittier
Mr. Mark Earnest, City Manager
P.O. Box 608
Whittier, AK 99693

Custom Marine Services
Mr. Larry Gilman
P.O. Box 672
Whittier, Alaska 99693

Re: Record of Decision: Cleanup Complete Determination - Whittier Incinerator
and Impound Yard.

Dear Mr. Earnest and Mr. Gillman:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, reviewed the assessment and cleanup records associated with the Incinerator and Impound Yard (City Sites) located at Lots 1, 2A and 3A, Block 11 in Whittier. These sites had been contaminated by releases of petroleum or hazardous substances; however, based on the information provided to date, the releases have been adequately addressed and do not pose an unacceptable risk to human health or the environment. Therefore, ADEC has determined that no further remedial action is required and that the City Sites can be closed subject to the conditions outlined in this document.

This decision is based on the administrative record for this site which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Anchorage, 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 ADEC determination.

These properties were historically used by the military and are part of the Whittier Formerly Used Defense Site (FUDS) property, referred to as the former power plant site. Environmental contamination on these properties that resulted from past military activity is being addressed by the US Army Corps of Engineers (Corps). Decisions on the need for and adequacy of the FUDS cleanup will be documented in a separate decision document written by the Corps. This decision letter only addresses the releases that were not associated with the military activities.

Introduction

Site name and location:

Incinerator and Impound Yard
Block 11, Lot 1, 2A, and 3A
Whittier, Alaska.

Name and mailing address of contact person:

City of Whittier
Mr. Mark Earnest, City Manager
P.O. Box 608
Whittier, AK 99693

Custom Marine Services
Mr. Larry Gilman
P.O. Box 672
Whittier, Alaska 99693

Database Record Key and CS file number:

ADEC Reckey No: 1989240920901
CS File No: 2114.38.001

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Three separate sites or contaminated areas are addressed in this document. The "Impound Yard" was a fenced storage area used by Exxon and the City of Whittier after the 1989 Exxon Valdez oil spill until 1997. Miscellaneous drums, contaminated soil and miscellaneous waste were stored in the area which resulted in surface soil contamination. The "Incinerator" was intended for operation by the city to burn oily waste, but only operated for some test burns. A contaminated soil stockpile (Stockpile Area) from environmental cleanup was stored in the Incinerator area. The third site is behind the Longs Marina Building and is known as the "Former AST". This tank was used by the community for collection of waste oil in the 1980's. Supporting environmental information is presented in the Final Cleanup Report for the sites on the subject property, submitted by Montauk Engineering for Custom Marine Services, LLC to the department on September 24, 2008.

Soil

Site investigations conducted in 2000, 2002 and 2008 at the sites indicated the presence of diesel fuel (DRO) in soil based on laboratory analyzed soil samples. The maximum DRO concentration detected at the Stockpile Area in a near surface sample was 1,700 mg/kg. The maximum DRO detection (near surface) at the Former Impound Yard was 1,450 mg/kg. The maximum concentration at the Former AST area (near surface) was 3,470 mg/kg. Benzene was also detected at the AST area in one sample at 0.10 mg/kg. Residual Range Organics (RRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX) were also detected at the sites, but below Method 2 migration to groundwater cleanup levels.

Groundwater

Two groundwater monitoring wells were installed by the City in 2002. Three monitoring wells have been installed and monitored on the same property by the Corps during work on the FUDS project. The northern most City well contained high concentrations of RRO, DRO, and lead in groundwater in 2002. The results were not reproducible in nearby COE monitoring wells during several later sampling events. The northern City well was destroyed soon after installation. It is surmised that the elevated contaminant concentrations resulted from high suspended solids in the samples collected shortly after the COE had conducted a removal action up gradient of the wells. During the last several groundwater sampling events samples collected from the three COE wells have all met the applicable Table C groundwater cleanup levels for DRO, RRO, BTEX, and semi-volatile organics.

Groundwater in the area has been determined to not be considered a reasonably expected future source of drinking water. The city has a water supply system that serves the area and there are no drinking water wells within ½ mile of the site.

Remedial Actions

Remedial action was performed at the site in July 2008. Approximately 30 cubic yards of contaminated soil were removed from the three subsites. Groundwater was not encountered during excavation.

The after action report indicates maximum concentration left in soil on site to be 1,100 mg/kg DRO. Benzene was not detected in the samples.

Chemicals of Concern

The contaminants of concern identified at this site are:

- Benzene
- Diesel Range Organics (DRO)

Cleanup Levels

The soil cleanup levels for this site are established in 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Ingestion and Outdoor Air Inhalation pathways.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
DRO	8250 (ingestion)
Benzene	8.5 (outdoor air inhalation)

The migration to groundwater pathway was determined to be incomplete because groundwater is not a current or reasonably anticipated future source of drinking water and groundwater monitoring at the site indicated groundwater meets the applicable cleanup levels described below.

The groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
DRO	1.5
GRO	1.3
Benzene	0.005
Toluene	1.0
Ethylbenzene	0.7
Total Xylenes	10.0

Exposure Pathways Identified

The exposure pathways for human health that were evaluated include the following: inhalation of outdoor air, ingestion of soil and direct contact with soil.

Both the outdoor air inhalation and direct contact with soil pathways may be complete, but the exposure risk is considered acceptable because remaining soil concentrations do not exceed direct contact or inhalation levels in 18 AAC 75.341 Table B2. The site is located in a commercial area.

Direct contact with contaminated soil is a complete pathway for site workers and visitors.

The ingestion of groundwater pathway is considered incomplete. There are currently no drinking water wells within ½ mile of the site and community water service is available.

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 incomplete except direct contact with surface soil which is ranked as De Minimus Exposure.

ADEC Decision

ADEC has determined that the cleanup action employed at Incinerator and Impound Yard was effective in removing a majority of the contaminant source material. 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 is required at the Incinerator or Impound Yard. The site status in the Contaminated Sites Program database will be changed to Cleanup Complete.

This determination is subject to the following conditions:

1. ADEC approval is required prior to off-site transport of soil or groundwater with residual contamination in accordance with 18 AAC 75.370(b). A figure is attached showing the approximate locations of area where residual soil contamination was identified in the shaded areas identified as Area A and Area B.

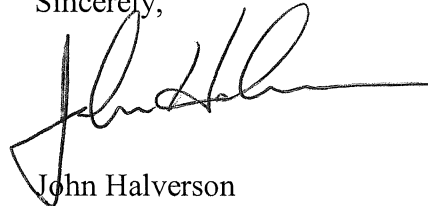
This determination is also subject to 18 AAC 75.385 (d)(2) whereby additional investigation and cleanup may be required if new information is discovered that indicates the cleanup described in this decision is not protective of human health or the environment.

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 Jeff Brownlee at (907) 269-3053.

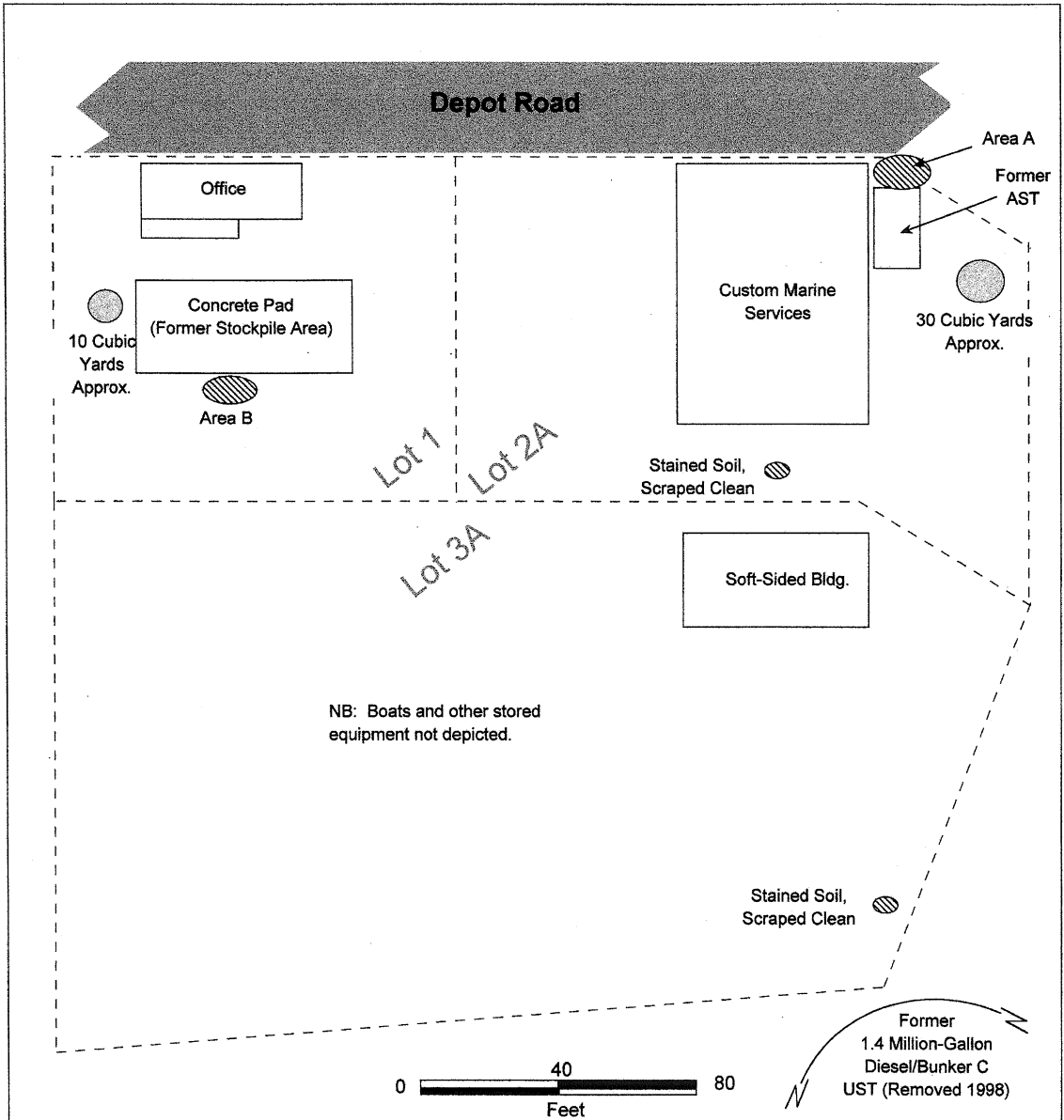
Sincerely,

A handwritten signature in black ink, appearing to read "John Halverson", written over a horizontal line.



John Halverson
Environmental Program Manager

cc: Mr. Cliff Ellsman, Montauk E/E, Anchorage
Jeff Brownlee, ADEC

Attachment: Montauk Drawing 2 showing Area A and Area B with residual contamination



NB: Boats and other stored equipment not depicted.

Legend	
	Cleanup Site
	Location Contaminated Soil Stockpile



Cleanup Report: Lots 1, 2A & 3A Gilman S/D Whittier, AK	
Drawing 2: Site Plan (Approx. Scale 1" = 40')	
Montauk E/E	<small>N.B.: This drawing is presented solely for informational purposes in support of this report, and is to be used for no other purpose.</small>