# STATE OF ALASKA

### **DEPT. OF ENVIRONMENTAL CONSERVATION**

## DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN. GOVERNOR

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File: 2453.38.004

November 6, 2008

Pat Desmet Regulatory Compliance Officer Lower Kuskokwim School District Plant Facilities Department P.O. Box 305 Bethel, AK 99559

Re: Tununak Paul T Albert Memorial School Tank Farm Record of Decision - Cleanup Complete Determination

#### Dear Mr. Desmet:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with Tununak Paul T Albert Memorial School Tank Farm in Tununak, Alaska. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and a Cleanup Complete determination will be granted.

This decision is based on the administrative record for Tununak Paul T Albert Memorial School Tank Farm 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 Cleanup Complete determination.

#### Introduction

#### Site Name and Location:

Tununak Paul T Albert Memorial School Tank Farm 125 Feet North of School (approximately) North End of Tununak Tununak, Alaska 99681

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

Pat Desmet Regulatory Compliance Officer Lower Kuskokwim School District Plant Facilities Department P.O. Box 305 Bethel, AK 99559

#### Database Record Key and File Number:

ADEC Reckey No. 2001250124802 File: # 2453.38.004 Hazard ID: 4641

Regulatory authority under which the site is being cleaned up: 18 AAC 75

**Background** 

Petroleum impacted soil was encountered during 2001 site reconnaissance conducted by Oasis Environmental. Soil at this site was sampled for diesel range organics (DRO); benzene, toluene, ethylbenzene, xylenes (BTEX), gasoline range organics (GRO), and residual range organics (RRO).

Cleanup Actions

The tank farm at the Paul T. Albert Memorial School consisted of two above ground storage tanks and was an active fuel storage facility approximately 15 years old. This tank farm was owned by the Alaska Department of Education and operated by the Lower Kuskokwim School District.

There was no documented spill history or observations of leaks or sheening at the time of the reconnaissance. A stained area was observed and its size and shape suggested that it could have been the former location of a drum. A sample was collected from the stained area at one foot below ground surface (bgs) which showed concentrations of 7,140 mg/kg DRO but was non-detect for BTEX compounds, GRO, and RRO. Another sample was collected from this same location at 2.5 feet bgs which was less than the most stringent cleanup levels for DRO and RRO. Three other samples were collected from this tank farm area and were also non-detect for DRO and RRO. The contaminated area was estimated to be 2.5 square feet at the surface and its depth less than 2.5 feet bgs which can be considered de minimis.

#### **Contaminants of Concern**

Diesel Range Organics (DRO)

#### Cleanup Levels

The soil cleanup levels established for this site are in 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Migration to Groundwater.

Contaminant Site Cleanup Level (mg/kg)
DRO 250

#### **Pathway Evaluation**

The exposure pathways for human health that were evaluated include the following: ingestion of soil and groundwater, indoor and outdoor inhalation of vapors, and dermal contact with soil. These pathways may be complete but the remaining contaminant concentrations exceeding the most conservative Method Two "Migration to Groundwater" cleanup levels in Tables B1 and B2 for the Under 40 inch Zone established in 18 AAC 75.341 are considered to be de minimis in extent.

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 de minimis or incomplete.

#### **ADEC Decision**

The cleanup actions to date have served to excavate and adequately remove contaminated soil from the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as "Cleanup Complete" on the Department's database.

Although a Cleanup Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75.370(b). However, since this site has met the most conservative soil cleanup levels, this letter will serve as your approval for future off-site movement and disposal of soil associated with this release. It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with 18 AAC 75.380(d)(1) 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.

#### 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 ADEC project manager, Keather McLoone at (907) 269-7526.

Sincerely,

Linda Nuechterlein Environmental Manager

cc: Joey Billy, Brownfield Coordinator, Native Village of Tununak Kimberly Andrews, Alaska Department of Education and Early Development