

STATE OF ALASKA

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

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June 18, 2004

Ms. Edie Knapp P.E.
Project Manager
Anchorage School District
Facilities Department
1301 Labar Street
Anchorage, Alaska 99515

RE: Quarterly Groundwater Monitoring Report, Student Transportation Facility 3580 Tudor Road, Anchorage, Alaska, ADEC Facility ID Number 3089.

Dear Edie:

The Department of Environmental Conservation, Contaminated Sites Program, (DEC) completed the review of the document titled: Quarterly Groundwater Monitoring Report, Student Transportation Facility 3580 Tudor Road, Anchorage, Alaska dated December 4, 2003. Based on that review, DEC has determined that no further remedial action is required at this site. The information presented below is a summary of the assessment and cleanup activities at this site and was considered in making this determination.

Background.

Five underground storage tanks (UST's) were removed from the ground from three separate areas at the site during December 21-31, 1997. Despite extensive removal of contaminated soil, soil contamination remains in close proximity to the building foundation and has impacted shallow groundwater in the area of the fueling facility at the south end of the building and may extend under the foundation. Soil contamination also remains in close proximity to the building foundation and within the groundwater to the east side of the building where the former waste oil tank was located and may extend under the building foundation.

Contaminated soil has been removed to the extent practicable and further soil removal could jeopardize the integrity of the building foundation. The site cleanup levels for soil established for this site are the 18 AAC 75.341 Tables B1 and B2 migration to groundwater levels for the Under 40 inch zone.

Groundwater has been monitored since 1998 and has identified areas impacted by petroleum hydrocarbons. The most recent groundwater monitoring event identified three wells with contamination above 18 AAC 75.345 Table C levels.

Contaminant of Concern (mg/L)	MW01	MW04	G04	ADEC Cleanup Levels
GRO	11.8			1.3
DRO	2.6	9.34		1.5
RRO		7.99		1.1
benzene	1.14		0.0515	0.005
toluene	3.68			1.0

Groundwater results indicating contamination by metals are considered attributable to background soil concentrations. The groundwater flow direction is to the north and west, and varies in depth from 7 to 12 feet below the ground surface (bgs). Data collected from site monitoring wells indicates that contamination is not migrating from the site. It should also be noted that the shallow groundwater at this site is not used for drinking water since the property is served by the municipal water system.

DEC Determination

The site is almost entirely covered with asphalt pavement and/or buildings that serve to minimize the infiltration of precipitation through the soil. The contaminated soil has been removed from the ground to the extent practicable and, therefore, it is anticipated that the groundwater contaminant levels should decrease over time since the majority of source material has been removed.

Based on this information, DEC has determined that No Further Remedial Action Planned (NFRAP) status is appropriate for this site. Even though the shallow groundwater contamination remains above the established cleanup levels it does not pose a risk to human health or the environment and it is not migrating. This determination is subject to the following conditions:

1. Groundwater monitoring is required until a stable or decreasing trend in contaminant concentrations is established and/or 18 AAC 75.345 Table C levels are achieved. A groundwater monitor plan must be submitted to DEC for approval. DEC suggest that monitoring be conducted at least once per year during a time of the year when past sampling has shown the highest contaminant concentrations in groundwater.
2. An institutional control in the form of a database entry will be established to identify the nature and extent of contamination remaining on site. This control will remain until soil and groundwater meet the established cleanup levels for this site.
3. The excavation and transport of soil or groundwater from this site must be approved by DEC in accordance with 18 AAC 75.325(i).
4. This determination is based on information provided to date. If future information is provided that indicates hazardous substance contamination is present at levels that may pose a

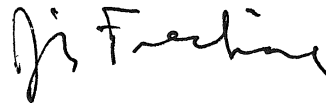
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risk to human health or the environment, additional assessment and/or cleanup action may be required.

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. 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 any questions or comments please call David Pikul at 269-7551.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Frechione". The signature is fluid and cursive, with the first name "Jim" and last name "Frechione" clearly distinguishable.

Jim Frechione
Environmental Manger

cc: Aaron Banks, R&M

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