

STATE OF ALASKA

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

SARAH PALIN, GOVERNOR

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File: 2332.38.033
Return Receipt Requested
No: 7007 0710 0004 3852 9038

January 23, 2009

Susan Schrader
Alaska Railroad Corporation
P.O. Box 107500
Anchorage, Alaska 99510-7500

Re: Record of Decision (ROD) ARRC Henderlong Building Seward
Cleanup Complete Determination

Dear Ms. Schrader:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed review of the environmental records associated with ARRC Henderlong Building, Seward. 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 this site will be closed.

This decision is based on the administrative record for ARRC Henderlong Building Seward, which is located in the offices of the 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:

ARRC Henderlong Building Seward
Seward Lease 7379 Port Avenue
Seward, Alaska 99664

Name and Mailing Address of Contact Party:

Susan Schrader
Alaska Railroad Corporation
P.O. Box 107500
Anchorage, Alaska 99510-7500

Database Record Key and File Number:

ADEC Reckey: 2006230127601

File: 2332.38.033

Hazard ID: 4416

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Petroleum impacted soils were encountered during a floor drain excavation at the Henderlong Building in 2006.

Contaminants of Concern

During the various investigations at this site, groundwater and soil samples were analyzed for diesel range organics (DRO); gasoline range organics (GRO); volatile organic compounds (VOC); semi-volatile compounds (SVOC); polychlorinated biphenyls; metals; and benzene, toluene, ethylbenzene, and xylene (BTEX). Based on these analyses and knowledge of the contaminant source, the following Contaminants of Concern were identified:

- Benzene
- Toluene

Cleanup Levels

The soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2 Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Benzene	0.025
Toluene	6.5

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

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
Benzene	0.005
Toluene	1.0

Site Characterization and Cleanup Actions

Evaluation of the onsite water well and soil underneath the concrete floor drain area was performed in the fall of 2006. Approximately 4 cubic yards of soil were excavated from the top 6 inches below the former floor drain and placed in two 55-gallon drums. Soil samples collected from the drums and the excavation contained benzene up to 1.15 mg/kg and toluene up to 15.7 mg/kg. Contaminants were not detected in the ground water sample from the onsite water well.

Further excavation and evaluation of soil and groundwater was performed in 2007. Soil was excavated from the location of the former floor drain and stockpiled in two separate piles inside the Henderlong Building. Soil samples collected from the stockpiles contained benzene up to 0.0256 mg/kg. Four soil samples collected from the excavation bottom contained benzene up to 0.385 mg/kg. A water quality sample collected from the onsite water well indicated the groundwater is influenced by salt water intrusion from nearby Resurrection Bay.

In 2008, additional characterization of the groundwater was conducted and the stockpiles were transported to Alaska Soil Recycling for treatment. Groundwater samples collected from two temporary monitoring wells between the building and Resurrection Bay did not contain contaminants above ADEC cleanup levels.

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 do not exceed inhalation, ingestion, or direct contact cleanup levels.

The migration to groundwater pathway may be complete, but drinking water is supplied by the city of Seward. Groundwater samples from the onsite non-potable well did not contain detectable concentrations of contaminants. Furthermore, due to the salt water influence from Resurrection Bay, the onsite well is not suitable for use as a drinking water source.

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 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 75.325(i). 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) 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 Grant Lidren at (907) 269-8685.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Nuechterlein".

Linda Nuechterlein
Environmental Manager