

STATE OF ALASKA

SARAH PALIN, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

43335 K-Beach Road, Suite 11
Soldotna, AK 99669
PHONE: (907) 262-5210
FAX: (907) 262-2294
<http://www.state.ak.us/dec/>

File: 2323.38.035

March 20, 2009

Mr. Douglas Kinnett
Marathon Petroleum Company, LLC
1230 Meadow Ln
Hillsdale, MI 49242

Re: Record of Decision (ROD)
Marathon East Forelands Flare Pit
Cleanup Complete Determination

Dear Mr. Kinnett:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Marathon East Forelands Flare Pit site, located in North Kenai, Alaska. 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 currently required for this site.

This decision is based on our administrative record for the Marathon East Forelands Flare Pit site, which is located in the Soldotna office of the ADEC. 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 this Cleanup Complete determination.

Introduction

Site name and location:

Marathon East Forelands Flare Pit, North Kenai, Alaska
Kenai Peninsula Borough Parcel Numbers 01203004, 01203003, and 01203012, located within the W1/2, SE1/4, Section 35, T8N, R12W, Seward Meridian

Name and mailing address of current contact and/or responsible person:

Mr. Douglas Kinnett
Marathon Petroleum Company, LLC
1230 Meadow Ln
Hillsdale, MI 49242

Database Record Key and File Number:

ADEC Reckey: 2004230123101
ADEC Hazard ID: 4091

Regulatory authority under which the site has been cleaned up:

This project was reviewed under the applicable regulatory authority in 18 AAC 75, Article 3, revised as of October 9, 2008.

Background

The Marathon East Forelands oilfield support facility is located about 12 miles north of Kenai, Alaska. The facility is used for pipeline pigging operations and as a fluid receiving area for pipelines from the west side of Cook Inlet. During pigging, natural gas is also received at this facility and a flare was used to vent this natural gas. In 2004, a pipeline fluids release occurred in the former flare pit during pig trap operations. Vent lines from the two 15,000-gallon receiving tanks and from the separator/receivers were piped to the flare pit. It was through this piping that fluids were released to the flare pit. This vent/dump piping has since been taken out of service. During the cleanup effort, petroleum-impacted soils were encountered. Groundwater was not impacted.

Soil samples collected at this site have been tested for: benzene, toluene, ethylbenzene, and xylene (BTEX), gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), and Polynuclear Aromatic Hydrocarbons (PAHs).

Site Characterization and Cleanup Actions

Initial assessment work was performed in 2005. Two soil borings were drilled to depths of 47 and 127 feet below ground surface (bgs). Groundwater was not encountered in either boring. Soil contamination was detected above applicable ADEC soil cleanup levels at depths in the 5 to 12 feet bgs zone.

Two contaminated soil excavation cleanup events were completed in 2007, resulting in a flare pit excavation measuring about 34 feet by 48 feet, with a maximum depth of 22 feet bgs. Approximately 550 cubic yards of contaminated soil was removed and placed in a soil stockpile located at the site. After excavation confirmation sampling was completed, the flare pit excavation was backfilled. In 2008, the stockpiled contaminated soils were transported to Alaska Soil Recycling in Anchorage for final treatment and disposal.

The flare pit excavation was divided into 4 separate decision units, and multi-incremental soil sampling was performed on the in-situ soils remaining in each decision unit. DRO was the only contaminant of concern detected in concentrations exceeding ADEC soil cleanup levels. DRO exceeded ADEC soil cleanup levels in each decision unit, at concentrations from 368 to 941 mg/kg.

Residual Contaminants of Concern

- Diesel Range Organics (DRO)

Cleanup Levels

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

Contaminant	Site Cleanup Level (mg/kg)
• Diesel Range Organics	230

Pathway Evaluation

The exposure pathways for human health that were evaluated include the following: ingestion of, and direct contact with, soil and groundwater; indoor and outdoor inhalation of vapors; and direct contact with soil. Impacts to ecological receptors were also evaluated, but there was no complete pathway.

The outdoor inhalation, ingestion, and direct contact exposure risk is acceptable because contaminated soil removal operations reduced remaining DRO concentrations to below ingestion/inhalation cleanup levels. Further, the remaining soil contamination has been covered with clean backfill soils which were hauled in from off-site, preventing exposures at the ground surface. The indoor air exposure pathway risk is considered de minimus because of the separation distance from the flare pit site to existing structures, and due to the relatively low concentrations, and the relatively low volatility, of the residual DRO contamination at this site.

Groundwater was not encountered at the site, or impacted, so the groundwater exposure pathways are incomplete.

The above exposure pathway analysis was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be one of the following: *De Minimus Exposure, or Pathway Incomplete* for human health and *Pathway Incomplete* for ecological impacts.

ADEC Decision

The ADEC has determined that there is currently no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete determination. Because the last soil sampling and analyses detected DRO contamination exceeding the applicable soil cleanup levels, prior ADEC approval must be obtained for any excavation, transport, movement, remediation, and/or disposal of soils excavated from the spill site. This is consistent with the requirements of 18 AAC 75.325 (i), 18 AAC 75.360, and 18 AAC 75.370 (b).

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the soil contamination remaining at the site.

This determination is consistent 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 Cleanup Complete determination, you may contact the ADEC project manager, Paul Horwath, at (907) 262-5210 x250.

Sincerely,



Paul Horwath
Environmental Engineer

C: Dan Franks, Oasis Environmental, Anchorage
Peter Campbell, American Environmental, Inc.

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