STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN. GOVERNOR

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File: 330.38.076 Certified Return Receipt Article No: 7007 3020 0000 1948 8650

March 11, 2009

Jan Shifflet Alyeska Pipeline Service Company Mail Stop 507 / PO Box 196660 Anchorage, AK 99519-6660

Re: Record of Decision (ROD); Alyeska PS 08 Manifold Building Cleanup Complete Determination-Institutional Controls

Dear Mr. Shifflet:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Alyeska Pump Station (PS) 08 Manifold Building located near Eielson Air Force Base, 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 will be required as long as the site is in compliance with established institutional controls.

This decision is based on the administrative record for the Alyeska PS 08 Manifold Building which is located in the offices of the Alaska Department of Environmental Conservation 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 with ICs determination.

Introduction

Site Name:

Alyeska PS 08 Manifold Building
Off MP 330 Richardson Hwy
Onto Johnson Road
Near Eielson Air Force Base, Alaska 99702

Name and Mailing Address of Contact Party: Jan Shifflet Alyeska Pipeline Service Company Mail Stop 507 PO Box 196660 Anchorage, AK 99519-6660

Database Record Key and File Number:

ADEC Reckey: 1996720124401

File: 330.38.076 Hazard ID: 2678

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Releases of turbine fuel in the offloading area at Pump Station (PS) 8 directly impacted soils in an area of approximately 500 square feet adjacent to the booster pump building.

Soil samples collected at this site have been tested for benzene, toluene, ethylbenzene, xylenes (BTEX), gasoline range organics (GRO), diesel range organics (DRO), residual range organics, and polynuclear aromatic hydrocarbons (PAH). A few of the samples were also tested for aliphatic and aromatic hydrocarbon fractions.

Contaminants of Concern

- Gasoline Range Organics (GRO)
- Diesel Range Organics (DRO)

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.

Contaminant	Site Cleanup Level (mg/kg)
Gasoline Range Organics	300
Diesel Range Organics	250

Site Characterization and Cleanup Actions

The observation of surface-stained soils in 1996 led to the removal of approximately 75 cubic yards of turbine fuel contaminated soils. Bedrock limited the excavation to 9 feet below ground surface (bgs) at the deepest vertical point. The excavation was limited horizontally by the presence of buildings and utility features. Confirmation samples contained up to 13,000 mg/kg DRO and 410 mg/kg GRO.

In 1998, a subsurface investigation was conducted to further delineate the soil contamination. Five borings were advanced to a maximum depth of 55.5 feet bgs. Two were located within the former excavation area and three outside it. These borings were completed as bioventing wells but that system was never completed.

At least one sample was collected from each of the 1998 borings. Two of eleven samples collected had DRO up to 392 mg/kg. One sample was analyzed for GRO, BTEXs, and PAHs and results were below the most conservative cleanup criteria. This investigation was unable to completely determine the extent of remaining contamination due to the presence of underground pipe.

Pathway Evaluation

The exposure pathways for human health that were evaluated include: inhalation of indoor and outdoor air; ingestion of and direct contact with soil; and ingestion of groundwater water. The ingestion of/direct contact with soil and outdoor inhalation pathways may be complete but the risk is considered acceptable because the site is fenced with only site restoration activities planned for the foreseeable future. Also, the soil concentrations remaining above cleanup levels are limited in extent and are at depth.

The groundwater pathway may be complete but this risk is considered acceptable because bedrock in the area is shallow, and the PS 08 well is located within a very deep aquifer at about 375 feet bgs. The indoor inhalation pathway may be complete but the risk is considered to be acceptable because the nearby buildings are unoccupied, and the remaining contamination is below applicable cleanup levels.

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 one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete.

ADEC Decision

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete- ICs determination subject to the following.

- 1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Alyeska Pipeline Service Company shall report to ADEC every five years to document land use, or report as soon as Alyeska Pipeline Service Company becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.
- 2. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
- 3. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 75.325 (i). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
- 4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

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 contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, then the Institutional Controls will be terminated.

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.

Please sign and return Attachment A to ADEC within 30 days of receipt of this letter. 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

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Attachment A: Cleanup Complete-ICs Agreement Signature Page

Attachment B: Site Figure

Attachment A: Cleanup Complete-ICs Agreement and Signature Page*

Alyeska Pipeline Service Company agrees to the terms of this Cleanup Complete with ICs determination as stated in this Record of Decision (ROD) document dated March 11, 2009 for the Alyeska PS 08 Manifold Building, Hazard ID: 2678. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 18 AAC 75.380(d).

Signature of Authorized Representative, Title Jan Shifflet/ Alyeska Pipeline Service Company

Printed Name of Authorized Representative, Title Jan Shifflet/ Alyeska Pipeline Service Company

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the ADEC project manager, Keather McLoone at the address on this correspondence within 30 days of receipt of this letter. After ADEC has received your signed copy, the Contaminated Sites database will be updated, and this closure decision will then take effect.

*Attention ADEC Administration Staff: Please do not file this form until the ADEC project manager has updated the database.

Attachment B: Site Figure

