STATE OF ALASKA

SARAH PALIN, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 2100.38.394

November 21, 2008

Edie Knapp
Division of Facilities and Operations
Anchorage School District
1301 Labar Street
Anchorage, Alaska 99515

Re: Record of Decision - ASD Lake Otis Elementary School
Cleanup Complete Determination

Dear Ms Knapp:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Anchorage School District (ASD) Lake Otis Elementary School located at 3331 Lake Otis Pkwy., Anchorage, 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 this site will be closed.

This decision is based on the administrative record for ASD Lake Otis Elementary School, 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:
ASD Lake Otis Elementary School
3331 Lake Otis Pkwy.
Anchorage, Alaska 99507

Name and Mailing Address of Contact Party:
Edie Knapp
Division of Facilities and Operations
Anchorage School District
1301 Labar Street
Anchorage, Alaska 99515

Database Record Key and File Number:
ADEC Reckey No. **1990210109401**
File: # 2100.38.394
Hazard ID: 4665

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

Background
In April 1990 petroleum impacted soil was encountered during the pre-excavation sampling for the removal of two diesel fuel underground storage tanks. Soil samples taken at that time contained total petroleum hydrocarbons (TPH) up to 640 mg/kg. During the follow up investigations at this site soil samples were analyzed for TPH; arsenic, chromium, lead; polychlorinated biphenyls (PCBs), and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX).

Cleanup Actions
Petroleum impacted soil was excavated during tank removal and stockpiled on site. The extent of the excavation was limited due to the close proximity of the building. A confirmation soil sample taken from the area under the fuel line just prior to it entering the building contained TPH at 410 mg/kg. Five other confirmation soil samples from the limits of the excavation did not contain detectable concentrations of TPH.

Following characterization of the stockpile, about 534 tons of contaminated soil was transported to Alaska Soil Recycling (ASR) on July 25, 1990 for thermal remediation. Those soils were treated and then blended with base material by ASR for use in paving projects.

Contaminant of Concern
- Total Petroleum Hydrocarbons (TPH)

Cleanup Levels
At the time of this investigation, the ADEC cleanup level for TPH was 100 mg/kg. The current cleanup level for the diesel fraction of TPH is 250 mg/kg.

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 are considered De Minimis and do not pose a risk to human health and the environment.

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 Exposure, Exposure Controlled, or Pathway 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)). However, because of the low contaminant concentrations remaining, 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) 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, Pam Clemens at (907) 269-7551.

Sincerely,

Bel Sundet for

Linda Nuechterlein
Environmental Manager

CC: Dan Roth, Municipality of Anchorage Onsite Water and Wastewater program