

STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

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File: 2332.38.002
Return Receipt Requested
Article No: 70073020000019488933

April 17, 2009

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

Re: Record of Decision: ARRC Seward Rail Yard
Cleanup Complete Determination- Institutional Controls

Dear Ms. Schrader:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the ARRC Seward Rail Yard. 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 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 ARRC Seward Rail Yard, 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 with Institutional Controls Determination.

Introduction

Site Name and Location:

ARRC Seward Rail Yard
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: 1992230132504
File: 2332.38.002
Hazard ID: 1529

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Petroleum impacted soils were encountered in 1993 during the excavation of two 10,000 gallon heating oil underground storage tanks (HOTs). Tank 1(T1) was located at the north end of the former old dock building. Tank 2 (T2) was located 40 feet north of the Roundhouse Building.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for diesel range organics (DRO) and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylene (BTEX). Water samples were analyzed for DRO. Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Diesel Range Organics (DRO)

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Diesel Range Organics	250

The default groundwater cleanup levels for this site are established in 18 AAC 75.341, Table C.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
Diesel Range Organics	1.5

Site Characterization and Cleanup Actions

Approximately 100 cubic yards of visually contaminated soil were removed during the excavation of tank T1 in 1993. The excavation, which was limited by the dock building retaining wall, measured 43 feet by 17 feet by 9.5 feet in depth. Confirmation samples collected at the base of the excavation contained diesel range organics (DRO) up to 583 mg/kg. Clean fill was used to backfill the excavation. No groundwater was encountered.

Approximately 314 cubic yards of contaminated soil were removed during the excavation of tank T2 in 1993. Groundwater, encountered at 7 feet below ground surface (bgs) contained a hydrocarbon sheen, and the excavated soil had a septic odor. The excavation, which was limited by the railroad tracks, measured 27 feet by 44 feet by 8.5 feet in depth. Confirmation soil sample T2-C collected at 10.5 feet bgs contained DRO up to 7,500 mg/kg. Clean fill was used to backfill the excavation and a 2-tier PVC gallery was installed at approximately 4 feet bgs.

The former T2 excavation was investigated again in 2008. A soil sample collected from the ground water interface at 8.5 feet bgs, near the T2-C sample location, contained DRO up to 1,250 mg/kg. A groundwater sample, collected from a temporary monitoring well at the T2-C sample location contained DRO up to 0.756 mg/L.

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 direct contact with soil. The inhalation and ingestion pathways may be complete, but the remaining contaminant concentrations do not exceed inhalation and ingestion risk-based cleanup levels.

The ingestion of groundwater pathway may be complete, but drinking water is supplied by the City of Seward and no drinking water wells exist in the vicinity of the site. Contaminated soil remains on site, but is located in the subsurface and not available to receptors.

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 Minimus Exposure, Exposure Controlled, or Pathway Incomplete.

ADEC Decision

There is contamination remaining above established cleanup levels at the ARRC Seward Rail Yard, but ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete- Institutional Controls 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 institutional controls may not be protective and ADEC may require additional remediation and/or institutional controls. Therefore, ARRC will report to ADEC every five years to document land use, or as soon as ARRC becomes aware of any change in land ownership and/or use. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov**
2. A Notice of Environmental Contamination will be recorded on the ADEC database to document that there is residual contamination remaining on site above the most stringent ADEC cleanup levels.
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 potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.
5. The soil contamination located under the asphalt at the T1 location and near the railroad tracks at the T2 location is currently inaccessible (see attachment B). When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
6. The ADEC recommends that the 2-tier PVC gallery at the T2 excavation be decommissioned.
7. Groundwater wells may not be installed on site without ADEC approval.

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. Institutional Controls will be terminated when contaminant concentrations are below applicable ADEC cleanup levels, or when the site meets the requirements for a Cleanup Complete as determined by ADEC.

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,



Linda Nuechterlein
Environmental Manager

Sincerely,



Grant Lidren
Environmental Specialist

Attachment A: Cleanup Complete-ICs Agreement Signature Page

Attachment B: Site Figure

April 17, 2009

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

Alaska Railroad Corporation agrees to the terms of this Cleanup Complete with Institutional Controls determination as stated in this Record of Decision (ROD) document dated **April 17, 2009** for the ARRC Seward Rail Yard, Hazard ID: 1529. 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 75.380(d).

[Handwritten Signature] *Env. Engr* 4/20/09
Signature of Authorized Representative, Title
Alaska Railroad Corporation

Susan M. Schrader *Env. Engr*
Printed Name of Authorized Representative, Title
Alaska Railroad Corporation

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APR 22 2009

DEPT. OF ENVIRONMENTAL
CONSERVATION

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, Grant Lidren at the address on this correspondence within 30 days of receipt of this letter.

Attachment B: Site Figure

