STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SARAH PALIN, GOVERNOR

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File: 2100.38.034 Return Receipt Requested Article No: 7007 3020 0000 1948 8940

April 28, 2009

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

Re: Record of Decision- ARRC Mushroom Yard 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 the ARRC Mushroom 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 this site will be closed.

This decision is based on the administrative record for the ARRC Mushroom 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 Determination.

Introduction

Site Name and Location: ARRC Mushroom Yard 1825 Ship Ave Anchorage, Alaska 99501

Name and Mailing Address of Contact Party: Susan Schrader Alaska Railroad Corporation P.O. Box 107500 Anchorage, Alaska 99510 ADEC Site Identifiers:

ADEC Reckey: 1992310123701

File #: 2100.38.034 Hazard ID: 606

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Contaminated soil was encountered during the removal a 1,000 gallon gasoline underground fuel tank and a 1,000 gallon diesel tank from a common excavation in 1989. Historical industrial activities at the site include, but are not limited to: welding, electrical contracting activities, sandblasting, painting, and vehicle maintenance.

Contaminants of Concern

During the various investigations at this site, soil samples were analyzed for diesel range organics (DRO), gasoline range organics (GRO), residual range organics (RRO), volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX), polychlorinated biphenyls (PCBs), and the metals arsenic, cadmium, chromium, and lead. 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> Site Cleanup Level (mg/kg)
Diesel Range Organics (DRO)
250

Site Characterization and Cleanup Actions

Approximately 35 cubic yards of contaminated soil were removed during the tank excavation in 1989. The excavation measured 22 feet by 11 feet by 12 feet in depth. Confirmation samples collected at the base of the excavation contained total petroleum hydrocarbons (TPH) up to 57.6 mg/kg. A composite sample collected from the contaminated soil stockpile contained DRO up to 44 mg/kg and Polychlorinated Biphenyls (PCBs) up to 0.322 mg/kg. Due to the detection of PCB contamination in the soil, the soil stockpile was initially transported to the north boundary of the ARRC Anchorage yard, where it was ultimately taken to the Anchorage Landfill for disposal in 1993.

This site is within a trichloroethylene (TCE) groundwater plume identified as GW-1 by the ARRC Remedial Investigation (RI) which was required by an Environmental Protection Agency (EPA) Administrative Order (Order). The TCE groundwater contamination associated with the MushroomYard site is being tracked in the CSP database under another site known as

"ARRC - Anchorage Terminal Reserve GW Area 1, "Hazard ID 25404. It is anticipated that further remedial activities and/or monitoring will be required of the ARRC to address groundwater contamination in this area. These activities will be detailed in a Feasibility Study (FS) which is being prepared by the ARRC as a requirement of the EPA Order.

Pathway Evaluation

The exposure pathways for human health that were evaluated for DRO include the following: ingestion of soil and groundwater, indoor and outdoor inhalation of vapors, and direct contact with soil. The soil inhalation and ingestion exposure risk is acceptable as the remaining concentrations are below inhalation and ingestion health based cleanup levels. The ingestion of groundwater risk is not complete as groundwater at the site is not used as a drinking water source. The nearest potable water well is located approximately 2,000 feet downgradient on the other side of Ship Creek and a sample collected from this well in 2006 did not indicate the presence of contaminants. Soil with detectable levels of PCB contamination from historical industrial activities may remain on site, but analytical soil samples indicate any remaining contamination is well below ADEC health-based 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 De Minimus Exposure, Exposure Controlled, or Pathway Incomplete.

ADEC Decision

The cleanup actions to date have served to excavate and adequately remove petroleum contaminated soil from the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required for contaminated soil associated with the petroleum source area. There is no longer a risk to human health or the environment, and the petroleum source area (only) associated with this site will be designated as cleanup complete on the Department's database. As mentioned above, TCE groundwater contamination associated with the Mushroom Yard is being tracked in the CSP database under another active site known as "ARRC - Anchorage Terminal Reserve GW Area 1,

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) and 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, Grant Lidren at (907) 269-8685.

Approved By,

Linda Nuechterlein Environmental Manager Recommended By,

Grant Lidren

Environmental Specialist