

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

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

410 Willoughby Ave., Suite 302
Box 111800 Juneau AK 99811-1800
PHONE: (907) 465-5210
FAX: (907) 465-5218
<http://www.state.ak.us/dec/>

File:1529.38.020
Return Receipt Requested
Article No. 7007 3020 0000 1948 3358

November 17, 2009

Carl Schrader
ADOT&PF Southeast Region, Environmental Division
ADOT&PF Southeast Region
P.O. Box 112506
Juneau, Alaska 99811-2506

Re: Record of Decision (ROD); ADOT&PF Wrangell Airport Buried Drums
Cleanup Complete Determination

Dear Mr. Schrader:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the ADOT&PF Wrangell Airport Buried Drum site located at the Wrangell Airport. Based on site information provided to date, the ADEC has determined that contaminant concentrations in environmental media do not pose an unacceptable risk to human health or the environment.

This decision is based on the administrative record which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Juneau, Alaska for the above referenced site. 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:

ADOT&PF Wrangell Airport Buried Drums
Wrangell, Alaska 99929

Name and Mailing Address of Contact Party:

Carl Schrader
ADOT&PF Southeast Region
Environmental Division
P.O. Box 112506
Juneau, Alaska 99811-2506

Database Record Key and File Number:

ADEC Spill Number: 07119921901

File: 1529.38.020

Hazard ID: 25422

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Petroleum impacted soil was encountered during the removal of the buried drums. Soil samples collected at this site have been analyzed for gasoline range organics (GRO); diesel range organics (DRO); and residual range organics (RRO); and benzene, toluene, ethylbenzene and xylene (BTEX). Soil samples collected at this site have also been tested for the BTEX and polycyclic aromatic hydrocarbon (PAHs) compounds using the Synthetic Petroleum Leaching Procedure. PAH compounds were not detected in the leachate with an instrument detection limit of 0.10 micrograms per liter (ug/L) and BTEX compounds were not detected with an instrument detection limit of 0.20 milligrams per liter (mg/L).

Shallow ground water in the area was investigated for contamination as a result of the 2003 Wrangell Airport AST Spill contaminated site investigation east of the Wrangell Airport Terminal. Ground water consistently tested below regulatory cleanup levels. Groundwater monitoring wells were left in-place under supervision of the airport manager, and recorded with the ADOT&PF property lease manager. Sewer and water are supplied to the airport by the City of Wrangell municipality.

Cleanup Activity

During excavation to construct a runway safety extension on August 7, 2007, a number of buried drums were discovered beneath shot rock fill that had been placed during the early 1970's. These drums (which were ultimately removed from the site) contained emulsified asphalt and had leaked, creating a small area of contaminated rock and soil. Contaminated soil and contaminated rock fill were placed in a lined and covered long term stockpile on August 11, 2007. This stockpile was later transported to the local landfill for use as top cover material.

The extent of cleanup was determined using visual inspection followed by Photoionization Detector soil screening method. As the emulsified asphalt remains in a tar-like condition, it does not migrate and does not generate volatile organic compounds. A threshold PID reading of 1.0ppm was used to screen confirmation soil samples collected from the walls and floor of the cleanup excavation. Much of the area contaminated was excavated to bedrock to insure no contaminants remained. Ground water was not encountered and was not investigated.

After the contaminated material had been removed, a series of exploration trenches were completed on the west, east and south sides of the project area. The north side was bedrock knob and eliminated from the exploration phase. Additional debris was found northwest of the drum site but

no contamination was identified by soil sample field screening. After backfilling with clean material the site was paved with asphalt.

Four analytical samples were collected from the contaminated soil stockpile following discrete soil screening of samples from borings chosen within each section of a grid imposed its surface. The highest concentration of DRO that was detected in soil was 487 milligrams per kilogram (mg/kg). All other petroleum fraction and compound analytes (including RRO) were either below instrument detection or below applicable soil cleanup levels for the Migration to Groundwater exposure pathway.

The laboratory noted that all soil sample data exhibited analytical patterns consistent with lube oil. These findings are consistent with the investigation conclusions that the soil contamination resulted from the contents of old asphalt tack material. In accordance with 18 AAC 60 and with approval from the ADEC Solid Waste Program, the 200 cubic yards of stockpiled soil was transported to the local landfill for use as top cover material.

Contaminants of Concern

- Diesel Range Organics (DRO)

Cleanup Levels

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

<u>Contaminant</u>	<u>Migration to Groundwater (mg/kg)</u>	<u>Direct Contact/ Ingestion (mg/kg)</u>	<u>Outdoor Inhalation (mg/kg)</u>
Benzene	0.025	120	8.5
Toluene	6.5	6,600	220
Ethylbenzene	6.9	8,300	81
Xylenes (total)	63	16,600	63
GRO	260	1,400	1,400
DRO	230	8,250	12,500
DRO	230	8,250	12,500

Pathway Evaluation

The human exposure pathways that were evaluated for this closure decision include dermal contact and ingestion of soil particles; inhalation of ambient air; and migration to groundwater. As a result of the cleanup remedy, present and future outdoor inhalation and dermal contact/ingestion exposure does not pose an unacceptable risk to receptors as any residual soil contamination remains below the ground surface. As a result of the site soil cleanup remedy, migration to ground and surface water pathways are controlled by source removal and capping to control infiltration of water to the subsurface.

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 cleanup actions to date have served to excavate and adequately remove contaminated soil from the site. Based on the available information, ADEC has determined no further assessment or cleanup action at the buried drum site is required. There is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Cleanup Complete determination has been granted for this site and two other contaminated sites at the Wrangell Airport, approval is required for off-site soil transport or disposal in accordance with 18 AAC 75.325(i). 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.

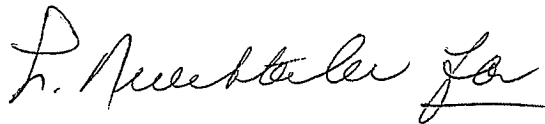
If you have questions about this closure decision, please contact the ADEC project manager, Bruce Wanstall at (907) 465-5210.

Approved By,



Linda Nuechterlein
Environmental Manager

Recommended By,



Bruce Wanstall
ADEC Project Manager