

# STATE OF ALASKA

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

**SEAN PARNELL, GOVERNOR**

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File: 2100.26.564

December 14, 2009

Mr. Jon Clark  
Municipality of Anchorage  
Department of Maintenance and Operations  
PO Box 196650  
Anchorage, Alaska 99519-6650

Subject: Record of Decision (ROD); MOA - Maintenance Building - UST 1448-2;  
Corrective Action Complete Determination

Dear Mr. Clark:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the environmental records associated with file number 2100.26.318. This file was originally listed in the CSP Database (DB) as the Site Name "MOA - Public Works Communications". There were two underground storage tanks (USTs) associated with this file, ADEC Facility ID 1448, Tank 1 and Tank 2. Because there are numerous USTs listed in the CSP DB on the same large tract where these two USTs are, the CSP has undertaken a process to clarify the confusion caused by so many USTs on the same property by segregating USTs into as few USTs per site as practical. A site is defined as an area that is contaminated from a source area, i.e., from a release of a hazardous substance. The goal is to list one site, i.e., release, per UST per site if feasible. If there are commingled plumes from several USTs adjacent to each other or the distribution lines, a single site will be created in the DB.

The subject file was recently split into two separate files, one for the site named "MOA - Maintenance Support Division Communications Shop - UST 1448-1", file 2100.26.318 which is Tank 1 and a second file for the site named "MOA - Maintenance Building - UST 1448-2", file 2100.26.564 which is Tank 2. These sites will be referred to by these names, hereafter. Tanks 1 and 2 are separated by approximately 140 feet. Tank 1 will be addressed independently later while this Record of Decision deals exclusively with Tank 2.

Since the file was created in 1997, the site building name and address changed from "Old Transit Maintenance Facility", 3650 C East Tudor Road to "Maintenance Building", 3701 Dr. Martin Luther King Jr. Avenue. These changes were based on a recent site visit and documentation of placards displayed on the building. The CSP Database has been updated to reflect these changes as well. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining at the "MOA - Maintenance Building - UST 1448-2" 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 "MOA - Maintenance Building - UST 1448-2" 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 Corrective Action Complete Determination.

## **Introduction**

### Site Name and Location:

MOA - Maintenance Building - UST 1448-2  
3701 Dr. Martin Luther King Jr. Avenue  
Anchorage, Alaska 99507

### Legal Description

Municipal Tudor Road Complex, Tract 1 (MOA Parcel ID 00805212), Anchorage Recording District, Alaska

### Name and Mailing Address of Contact Party:

Jon Clark  
Municipality of Anchorage  
Department of Maintenance and Operations  
P.O. Box 196650  
Anchorage AK 99519-6650

### Database Record Key and File Number:

ADEC Reckey: 1997210022004  
File: 2100.26.564  
Hazard ID: 24229

### Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

## **Background**

The Maintenance Building is located on a 35.88 acre parcel of land owned by the Municipality of Anchorage (MOA). The facility stores various transportation vehicles such as buses used for public transportation, and houses numerous enclosed buildings including buildings where maintenance is performed on those vehicles by employees of the MOA. The facility has been in operation for decades, and is connected to the MOA's public drinking water supply system and sewer system. Tank 2 was a 500-gallon UST installed at the site in 1978 along with its connection line to a nearby building. It stored waste oil piped to it from an oil and water separator located inside the adjacent building. The separator was removed by a MOA contractor prior to the UST closure.

Petroleum impacted soil was encountered during the 1997 removal of UST Tank 2 and associated piping.

### Characterization Activities

During the UST Tank 2 removal in 1997, approximately 26 cubic yards (cy) of soil was excavated. No holes were observed in the UST upon removal. The total depth of the excavation was 10 feet below the ground surface (bgs).

Groundwater was not encountered in the excavation during removal activities and is estimated to be between 15 and 20 feet bgs. The nearest down gradient public well is located approximately 1,900 feet west and the nearest down gradient private well is located approximately 1,400 feet west.

Four screening samples were taken from the resulting stockpile and two were submitted for laboratory analysis. Seven screening samples were taken from the excavation including one duplicate and three were submitted for laboratory analysis which included one duplicate. One sample was screened from beneath the piping and was submitted for laboratory analysis. Soil samples collected at this site were submitted for laboratory analysis of residual-range organics (RRO), diesel-range organics (DRO), gasoline-range organics (GRO), and benzene, toluene, ethylbenzene, and total xylenes (collectively known as BTEX). One sample each from the stockpile, UST excavation, and piping excavation were tested for polychlorinated biphenyls (PCBs), halogenated volatile organics (HVO), and total metals.

Analytical test results indicated that soil remaining in the former UST excavation and the stockpile did not contain petroleum hydrocarbons above applicable ADEC cleanup levels. The maximum results for all samples for RRO and DRO, in milligrams per kilogram (mg/kg), were 210 and 180, respectively. All BTEX, HVO, and PCB results were non-detectable (ND). The maximum values for arsenic, cadmium, total chromium, and lead, in mg/kg, were 5.1, ND, 27, and 5.9, respectively, which are all considered within area background levels. These results were from one sample each from the excavation, stockpile, and piping. Based on these sampling results the stockpile was used to backfill the excavation.

### Contaminants of Concern

- Residual-Range Organics (RRO)
- 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, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
RRO	10,000
DRO	250

The groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels. However, no groundwater samples were collected during any site investigations directly attributable to this site.

## **Pathway Evaluation**

The exposure pathways for human health that were evaluated for the site of the former 500 gallon UST include the following: ingestion of soil; dermal/direct contact with soil; inhalation; and ingestion of groundwater. These pathways may be complete but the remaining contaminant concentrations do not exceed the most conservative Method Two "Migration to Groundwater" cleanup levels in Tables B1 and B2 established in 18 AAC 75.341. No groundwater sampling was performed at the immediate site but the likelihood that groundwater would exceed the 18 AAC 75.345 Table C cleanup levels based on the documented site soil contamination levels and nearby groundwater monitoring results is highly unlikely.

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 or Pathway Incomplete.

## **ADEC Decision**

The cleanup actions to date have served to excavate and adequately characterize contaminated soil from the site of the former 500 gallon UST. Based on the information available, the 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" in the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil or groundwater disposal in accordance with 18 AAC 78.600(h) if a future need for removal of contaminated soil or groundwater arises. 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 78.276(f) and does not preclude the 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.

This determination also has no bearing on what actions the ADEC will require as the result of the contamination identified on other areas of the property, e.g., from the former 500-gallon waste oil UST.

## **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, Bill Petrik at (907) 269-7546.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Sundet", with a stylized flourish at the end.

Rich Sundet  
Environmental Manager

cc: Bill Petrik, CSP, Anchorage  
Tim Terry, Shannon & Wilson, Inc., Anchorage