STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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February 4, 2010

Kimberly Andrews
Alaska Department of Education and Early Development
801 West 10th St. Ste. 200
P.O. Box 110500
Juneau, AK 99811-0500

Re: Decision Document; Anvik Iditarod Area School Former Tank Farm
Cleanup Complete Determination

Dear Ms. Andrews:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with Anvik Iditarod Area School Former Tank Farm located in Anvik, Alaska. Based on the information provided to date, it has been 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 Anvik Iditarod Areas School Former Tank Farm, 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
Anvik Iditarod Area School Former Tank Farm
Anvik, Alaska

Name and Mailing Address of Contact Party:
Kimberly Andrews
Alaska Department of Education and Early Development
801 West 10th St. Ste. 200
P.O. Box 110500
Juneau, AK 99811-0500

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ADEC Site Identifiers:
Hazard ID #3366
ADEC Reckey # 2000250129007
CS file # 2405.38.007

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

Background
The tank farm at this site is no longer active; however the three, 7,000-gallon aboveground storage tanks (ASTs) remain at the site. The empty ASTs are located within a lined, bermed containment area that appears to have remained intact during the operational life of the tank farm. According to the contaminated sites database, approximately 3000 gallons of fuel were spilled at this tank farm when a valve was inadvertently left open. It is not clear whether the spill was contained inside the dike. In 2000, a soil sample was collected within the lined area below the suspected leaky valve, and contained diesel range organics (DRO) at 49,500 mg/kg.

Contaminants of Concern
During the various investigations at this site, soil samples were analyzed for diesel range organics (DRO), gasoline range organics (GRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), and polynuclear aromatic hydrocarbons (PAHs). Based on the results of these investigations, 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, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
Diesel range organics (DRO)	250

Site Characterization and Cleanup
An initial site investigation was conducted in 2000. Two soil samples collected at the time exceeded the ADEC Method Two "Migration to Groundwater" soil cleanup levels for DRO and GRO. However, the 2000 soil sample results were not adequate to delineate the full lateral or vertical extent of soil contamination, or to evaluate the potential impacts to groundwater or possibly nearby sources of drinking water. Therefore ADEC conducted additional site investigation at this site in 2009.

Seven test pits were excavated around the tank farm outside of the lined area to approximately 10 feet below ground surface and samples were collected every two feet for field screening. Two analytical samples were collected from each test pit as follows: one at the bottom and one at the location of the highest field screening result. None of the samples contained contaminants above the most conservative ADEC "Migration to Groundwater" cleanup levels. Groundwater was not encountered in any of the test pits.

The only potential water supply source within 500 feet of the Anvik Iditarod Area School Former Tank Farm is the school itself. A drinking water sample which was collected from the drinking water well at the Iditarod Area (Blackwell) school did not contain detectable concentrations of contaminants.

Pathway Evaluation

Following investigation and cleanup at the site, human health exposure to the remaining contaminants in soil was evaluated using ADEC's Exposure Tracking Model. The human health exposure pathways that were evaluated for this decision document included: inhalation of indoor and outdoor air; ingestion of soil; dermal contact with soil; and ingestion of surface water. A summary of this pathway evaluation is included in Table 1.

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Direct Contact with Surface or Sub-Surface Soil	Pathway Incomplete	Contaminants were not detected in surface soil and there was one detection in the subsurface well below cleanup levels. This indicates that the spill was likely contained within the dike, and did not reach either the surface or subsurface soil.
Inhalation of Indoor and Outdoor Air	Pathway Incomplete	The contaminant of concern (DRO) has low volatility, and was either not detected at all, or detected well below cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered during the investigation, and is not considered to be contaminated from this source
Surface Water Ingestion	Pathway Incomplete	Surface water in the area is not used for drinking water purposes.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not harvested in the tank farm area.
Exposure to Ecological Receptors	Pathway Incomplete	Recent analytical results did not detect contamination that would pose a risk to ecological receptors.

Notes to Table 1: "De-minimis exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. "Pathway incomplete" means that in ADEC's judgment contamination has no potential to contact receptors. "Exposure controlled" means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

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 closed 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). 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 ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,

Linda Nuechterlein
Environmental Manager

Recommended By,

William O'Connell
Environmental Program Specialist

CC: Joe Banghart, IASD
Rose Huntington, Anvik Tribal Council