

# STATE OF ALASKA

**SEAN PARNELL, GOVERNOR**

## DEPT. OF ENVIRONMENTAL CONSERVATION

### DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 1513.26.075

April 16, 2010

Via electronic and regular mail

Mr. Gareth Jones  
Dept of Administration  
Division of General Services  
P.O. Box 110210  
Juneau, Alaska 99811-0210

Re: Record of Decision; Governor Residence – 719 Calhoun Avenue HHOT  
Corrective Action Complete Determination

Dear Mr. Jones

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with Governor Residence - 719 Calhoun Avenue HHOT. 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 Governor Residence - 719 Calhoun Avenue HHOT, which is located in the offices of the ADEC in Juneau 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:

Governor Residence - 719 Calhoun Avenue HHOT  
716 Calhoun Avenue  
Juneau, Alaska 99801  
Legal Description: Governors Mansion Site; parcel 1C060A320010

Name and Mailing Address of Contact Party:

Mr. Gareth Jones  
Dept of Administration  
Division of General Services  
P.O. Box 110210  
Juneau, Alaska 99811-0210

Database Record Key and File Number:

File: 1513.26.075

Hazard ID: 25317

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

**Background**

When an interior above ground tank was installed to serve an emergency power generator in the referenced residential facility, a change in service for the existing storage tank was reported to ADEC's Underground Storage Tank Program. The former dual purpose fiberglass underground storage tank (UST) located behind the structure is listed by the UST Program with facility ID# 3282, Owner ID# 9623, tank #1 as installed in 1983 and having a capacity of 500 gallons. The fuel supplier lists the fill capacity of the UST at 1,000 gallon capacity. Depth to the bottom of the UST is estimated at three and one half feet below ground surface. A retaining wall on two sides of the UST elevates the overlying ground surface by approximately four feet above the street level.

Residual petroleum soil contamination was detected in the 2008 change-in-service site assessment of the heating oil UST and the associated piping. Soil samples collected at this site have been tested for: gasoline and diesel hydrocarbon fractions (GRO & DRO); benzene, toluene, ethylbenzene and total xylenes (BTEX) and polycyclic aromatic hydrocarbon compounds (PAHs) in the initial assessment. In the second assessment occurring in 2009 residual hydrocarbon fractions (RRO) were added to the analyte list. The polycyclic aromatic hydrocarbon compounds were discontinued from the requested contaminants to analyze for because of very low levels detected during the first assessment.

**Characterization Activities**

On August 19, 2008, a site assessment was performed for a change-in-service (from regulated to unregulated) for the heating oil UST located behind the residential facility at 719 Calhoun in Juneau. *Juneau Governor's House Site Assessment Report UST* by Carson Dorn Inc. (CDI) dated September 2008 (Report) stated that no leaks or odors were observed or detected during screening soil for the site assessment. Four soil samples and one duplicate were submitted for laboratory analysis; one subsurface sample below the UST (BH-1) and three surface samples, one at the fill pipe (BH-2), one at the piping run (BH-5), and one at the vent pipe next to the northeast wall of the building (BH-4).

The concentrations of PAHs in soil above instrument reporting limits in surface sample BH-2 were: Benzo (b) fluoranthene 0.0112 milligrams per kilogram (mg/kg). The following PAH concentrations were found in surface sample BH-4: Benzo (a) anthracene 0.0153 mg/kg; Benzo (a) pyrene 0.0251 mg/kg; Benzo (b) fluoranthene 0.0149 mg/kg; Benzo (ghi) perylene 0.0144 mg/kg; Fluoranthene 0.0297 mg/kg; and Pyrene 0.0135 mg/kg. Each of the PAH concentrations are below the corresponding 18 AAC 75.341 Table B1 cleanup levels. Surface sample BH-4 had the only result above instrument reporting limits; that was DRO with concentration of 5.97 mg/kg; the corresponding 18 AAC 75.341 Table B2 cleanup level for DRO is 230 mg/kg.

The Report did not have the required laboratory check list and the soil boring depth and location did not strictly meet the regulatory standard. ADEC requested that the environmental consultant CDI

submit the checklist and advance a second soil boring next to the UST to a depth below the bottom of the UST in accordance with 18 AAC 78.090. The checklist was delivered and is approved by ADEC.

In November 2009 two additional borings were completed and site assessment results were reported in *Governor's House UST Change-in-Service Site Assessment* dated December 2009 by CDI. Samples and a duplicate were collected from eight and one half feet below ground surface and from beneath piping near the building foundation forty two inches below ground surface. Petroleum hydrocarbon fractions GRO, DRO, and RRO and BTEX compound data were below laboratory reporting limits of instrument detection. The concentrations of those limits are all below regulatory soil cleanup levels listed in 18 AAC 75.341 Method Two Tables B1 and B2 and referenced in 18 AAC 78.600(a).

**Contaminants of Concern**

During the investigations at this site, soil samples were analyzed for GRO, DRO & RRO fraction hydrocarbons and BTEX and PAH hydrocarbon compounds. Based on these analyses and knowledge of the source area, no Contaminant of Concern was identified above the most stringent cleanup levels within 18 AAC 75.341.

**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. The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

**Pathway Evaluation**

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

**Table 1 – Exposure Pathway Evaluation**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Surface Soil Contact	Exposure Controlled	The initial detectable DRO and PAH contamination in surface soil was at safe concentrations and corrective action is unnecessary.
Sub-Surface Soil Contact	Exposure Controlled	The initial detectable PAH contamination was at safe concentration and additional subsurface soil samples found no petroleum above lab reporting limits in concentrations below Method Two Table B1 and B2 cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	Volatile compounds were not detected in any soil samples. PAHs detected were below screening levels for this pathway.

Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Volatile compounds were not detected in any soil and residual contamination is below migration to groundwater cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Soil contamination is below migration to ground water cleanup levels.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	No resources associated with this pathway are present at the site.
Exposure to Ecological Receptors	Pathway Incomplete	Aquatic and terrestrial receptors are not present in the urban residential area.

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 site assessment investigation has identified residual contaminated at the site. Based on the information available, ADEC has determined no further assessment and no cleanup action is required. There is no unacceptable risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site disposal of contaminated soil in accordance with 18 AAC 78.600(h). 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. However, since this site has met the most conservative soil cleanup levels, this letter will serve as your approval for future off-site movement and disposal of soil associated with this release.

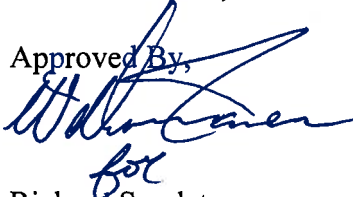
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

**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,



Richard Sundet  
Environmental Manager

Recommended By



Bruce Wanstall  
Environmental Program Specialist

cc: Steve Haavig, Carson Dorn Inc, via electronic mail