

STATE OF ALASKA

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

SEAN PARNELL, GOVERNOR

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File: # 102.26.016
102.38.016

Certified Return Receipt

Article No: 7008 1830 0002 6349 4470

May 19, 2010

Jan Shifflett
Alyeska Pipeline Service Company
Mail Stop 507
PO Box 196660
Anchorage, AK 99519-6660

Re: Alyeska Pipeline Service Building
Cleanup Complete Determination-Institutional Controls

Dear Mr. Shifflett:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) reviewed the environmental records associated with the Alyeska Pipeline Service Building located on Van Horn Road, in Fairbanks, Alaska. A previous decision letter was written on April 8, 2003 for the two 5,000 gallon heating oil underground storage tanks. The letter is to address other source areas at this facility. 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. No further remedial action will be required as long as the site is in compliance with established institutional controls (ICs).

This decision is based on the administrative record for Alyeska Pipeline Service Building site 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 ADEC determination.

Introduction

Site Name and Location

Alyeska Pipeline Service Building
1420 Van Horn Road
Fairbanks, AK

Name and Mailing Address of Contact Party:

Jan Shifflet
Alyeska Pipeline Service Company
Mail Stop 507
PO Box 196660
Anchorage, AK 99519-6660

Database Record Key and CS file number:

Hazard ID # 1077
CS file # 102.26.016/102.38.016

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

This site was added to the CSP database in 1990 due to a 1984 spill that occurred when one of two former heating oil tanks at the site was installed without a drain plug. As stated above, a decision letter was issued to indicate that no further remedial action was planned associated with the two former heating oil tanks. This letter is to address the other three source areas located at this facility as follows: (1) the fuel island area, (2) a former dry well, and (3) a former waste oil tank. These areas are all upgradient from the former heating oil tanks

The fuel island is located along the south edge of the current containment area for above ground storage tanks containing diesel fuel. The fuel island was the location of three documented spills and cleanup efforts, all of which resulted in remaining soil concentrations below the most conservative Method Two cleanup levels.

The former dry well was connected via drainpipes to the floor drain before Alyeska occupied the office, shop, and warehouse building. Characterization was conducted in this area to support the site-wide groundwater plume evaluation.

The former waste oil tank was located north of the office, shop, and warehouse building and just north of a small containment area for a day tank located between the former waste oil tank and building. It was removed in 1993 and there are no documented spills in this area.

Contaminants of Concern

During the investigations at the fuel island, former dry well, and former waste oil tank areas at this site, soil samples were analyzed for the following contaminants: gasoline range organics (GRO); diesel range organics (DRO); residual range organics; aliphatic and aromatic fractions of each petroleum hydrocarbon range; halogenated volatile organics (HVO); total recoverable petroleum hydrocarbons (TRPH); leachable metals using the Toxicity Characteristic Leaching Procedure (TCLP); polynuclear aromatic hydrocarbons (PAH); as well as benzene, toluene, ethylbenzene, and xylenes (BTEX). Groundwater samples collected site-wide were analyzed for BTEX, GRO, DRO, TRPH, PAH. 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 Tables B1 and B2, Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
DRO	250

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

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
Diesel Range Organics	1.5

Site Characterization and Cleanup Actions

The waste oil tank was removed in 1993 along with approximately 4.5 cubic yards (cy) of contaminated soil. The excavation was limited along the south wall of the excavation due to concerns about the structural integrity of an adjacent day tank containment area. Soil confirmation samples collected contained up to 532 mg/kg DRO. This concentration was found in the duplicate sample collected at the base of the excavation at 11 feet below ground surface (bgs).

In 1994, 35 gallons of diesel fuel were spilled at the fuel island area. Cleanup efforts included sorbent pads and removal of fuel-impacted and surface soil adjacent to the fuel island. Approximately 8.5 cy of soil were removed. The site assessment that followed this spill response included advancing four soil borings to up to 17 feet bgs. Soil samples were collected at the 2.5 and 5 foot bgs intervals. Monitoring wells (MW-12 and MW-13) were installed. Soil and groundwater sample concentrations were below Method Two and Table C cleanup levels, respectively. MW-13 was installed directly adjacent to the former dry well.

In August 1997, fuel was observed leaking from the fuel pump and an estimated seven gallons released. Alyeska removed approximately 40 cy of visibly contaminated soil after removing the fuel island. When the subsequent site assessment was performed, water with a sheen was removed from the excavation using a vacuum truck, and confirmation samples were also collected. These confirmation samples were all below Method Two cleanup levels.

In December 1997, an overflow spill of approximately 100 gallons occurred during fueling of a truck at the fuel island area. Alyeska personnel initially used sorbents on the spill and then excavated soil. The final excavation was mostly limited to the surface soil layer. Confirmation samples did not contain concentrations greater than Method Two cleanup levels.

Groundwater monitoring began in 1991 and continued until 2002 at a total of thirteen monitoring wells and one product recovery well. The highest concentrations remaining during the last sampling event were found in wells that were installed in the former heating oil tank

area but were also found in wells downgradient from the additional source areas. PW-1 and MW-1 had DRO concentrations of 12.6 and 3.33 mg/L respectively.

MW-12 was installed directly downgradient of the fuel island area in 1994, and did not contain concentrations above Table C during the five events it was sampled. Sampling of this well was discontinued in 1999. MW-13 was installed directly downgradient of the former dry well and did not contain concentrations above Table C during the two 1994 events in which it was sampled before monitoring was discontinued at this well.

MW-11 was installed about 100 feet downgradient from the former waste oil tank did not contain BTEX concentrations above Table C during the six sampling events it was sampled. It was found damaged, and was then decommissioned. All monitoring wells that could be located were decommissioned in 2009.

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 Tracking Model Results

Pathway	Result	Explanation
Surface Soil Contact	De minimis exposure	The removal action is presumed to have removed contaminated surface soil; therefore, the extent remaining at the surface is considered de minimis in volume.
Sub-Surface Soil Contact	De minimis exposure	The removal action served to remove the majority of contaminated soil, and any remaining contaminant concentrations in the subsurface are well below direct contact cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	The remaining soil contaminant concentrations are well below inhalation cleanup levels for DRO, and no other volatile compounds are present. Therefore, this pathway is considered incomplete.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	The remaining soil contaminant concentrations are well below inhalation cleanup levels for DRO, and no other volatile compounds are present. Therefore, this pathway is

		considered incomplete.
Groundwater Ingestion	De minimis exposure	Amount of remaining contaminated soil associated with the former waste oil tank is considered to be de minimis in volume. Furthermore, the onsite facility uses city water as a drinking water source. The downgradient wells at the property boundary, MW-10 and MW-14 did not exceed Table C cleanup levels and a water well search found no active water wells at risk.
Surface Water Ingestion	Pathway Incomplete	Surface water bodies within 1/4 mile are upgradient, and none are within several hundred feet. Results show that groundwater contamination had not migrated offsite.
Wild Foods Ingestion	Pathway Incomplete	DRO does not have the potential to bioaccumulate in plants or animals; and wild foods are not harvested in this area. Therefore this pathway is incomplete.
Exposure to Ecological Receptors	Pathway Incomplete	Site is an industrial area; no evidence of off-site migration; and wild foods are not harvested. Therefore this pathway is considered incomplete.

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

There is contamination remaining above established cleanup levels at the Alyeska Pipeline Service Building but ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete- ICs determination subject to the following.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Alyeska Pipeline Services Company shall report to ADEC every five years to document land use, or report as soon as Alyeska Pipeline Services Company becomes aware of any change in land ownership and/or use, if earlier.

The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.

2. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document.
3. Installation of groundwater wells will require approval from ADEC.
4. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 75.325 (i). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
5. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
6. Soil contamination is located in the area of the former waste oil tank (see attachment B). When the soil in this area becomes accessible, such as during building demolition, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, then the Institutional Controls will be terminated.

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.

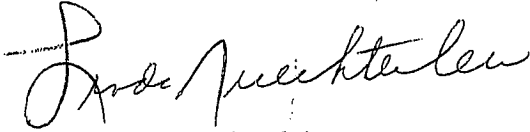
Appeal

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.

Please sign and return *Attachment A* to ADEC within 30 days of receipt of this letter. If you have questions about this closure decision, please contact the ADEC project manager, Keather McLoone at (907) 269-7526.

Approved By,

Recommended By,



Linda Nuechterlein
Environmental Manager



Keather McLoone
Environmental Specialist

- Attachment A: Cleanup Complete-ICs Agreement Signature Page
- Attachment B: Site Figures
- Attachment C: Notice of Environmental Contamination

Cc: Scott Rose, SLR

Attachment A: Cleanup Complete-ICs Agreement and Signature Page*

Alyeska Pipeline Service Company agrees to the terms of this Corrective Action Complete with Institutional Controls determination as stated in this Closure Decision Document for *Alyeska Pipeline Service Building* dated **May 19, 2010**. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380(d).

Signature of Authorized Representative, Title
Jan Shifflet/ Alyeska Pipeline Service Company

Printed Name of Authorized Representative, Title
Jan Shifflet/ Alyeska Pipeline Service Company

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

ADEC File No.: 330.26.016/330.38.016
Hazard ID: 1077
ADEC Project Manager: Keather McLoone

For Internal Use Only

*Attention ADEC Administration Staff: Please follow the procedure below after Attachment A is signed/returned to ADEC.

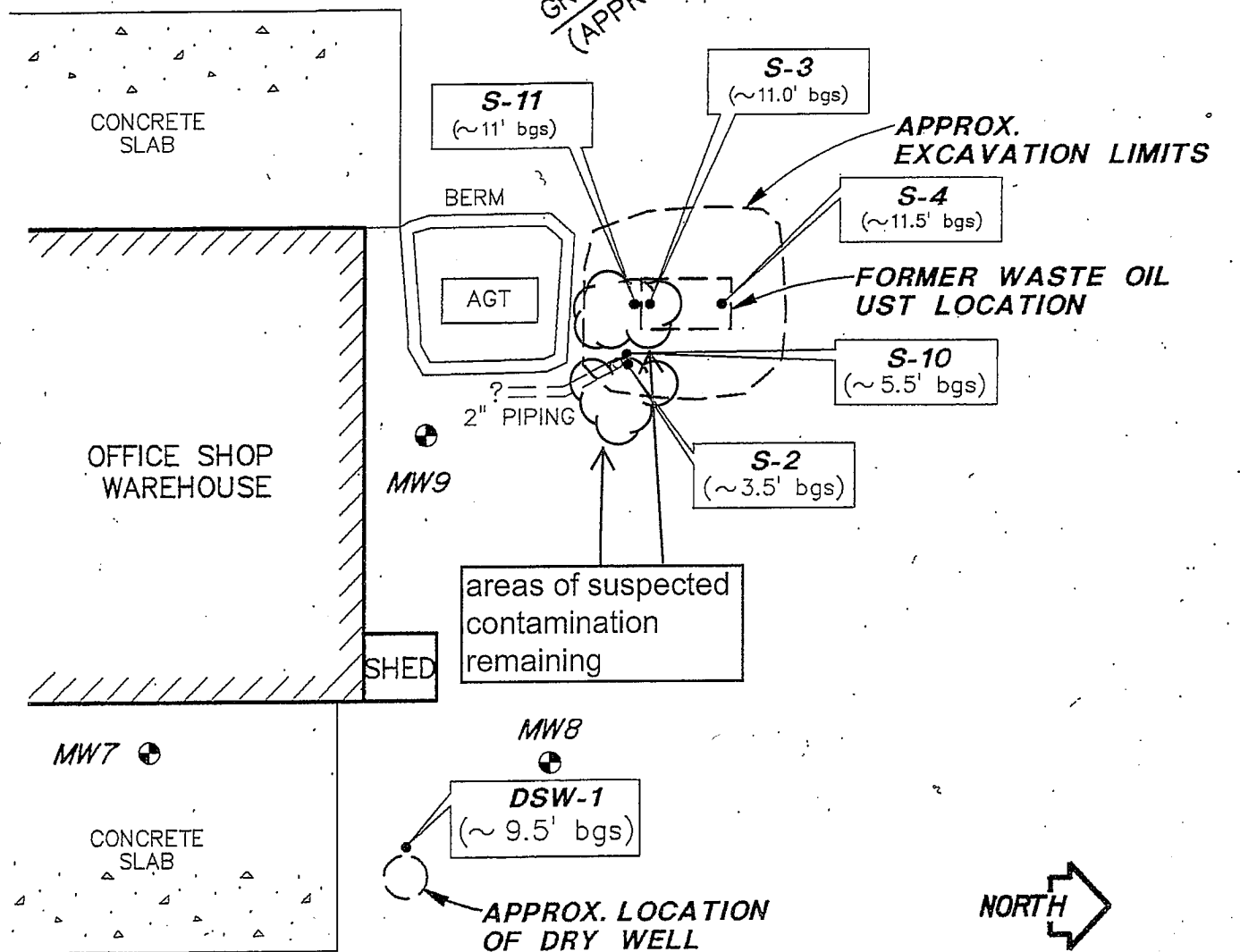
1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

EXPLANATION

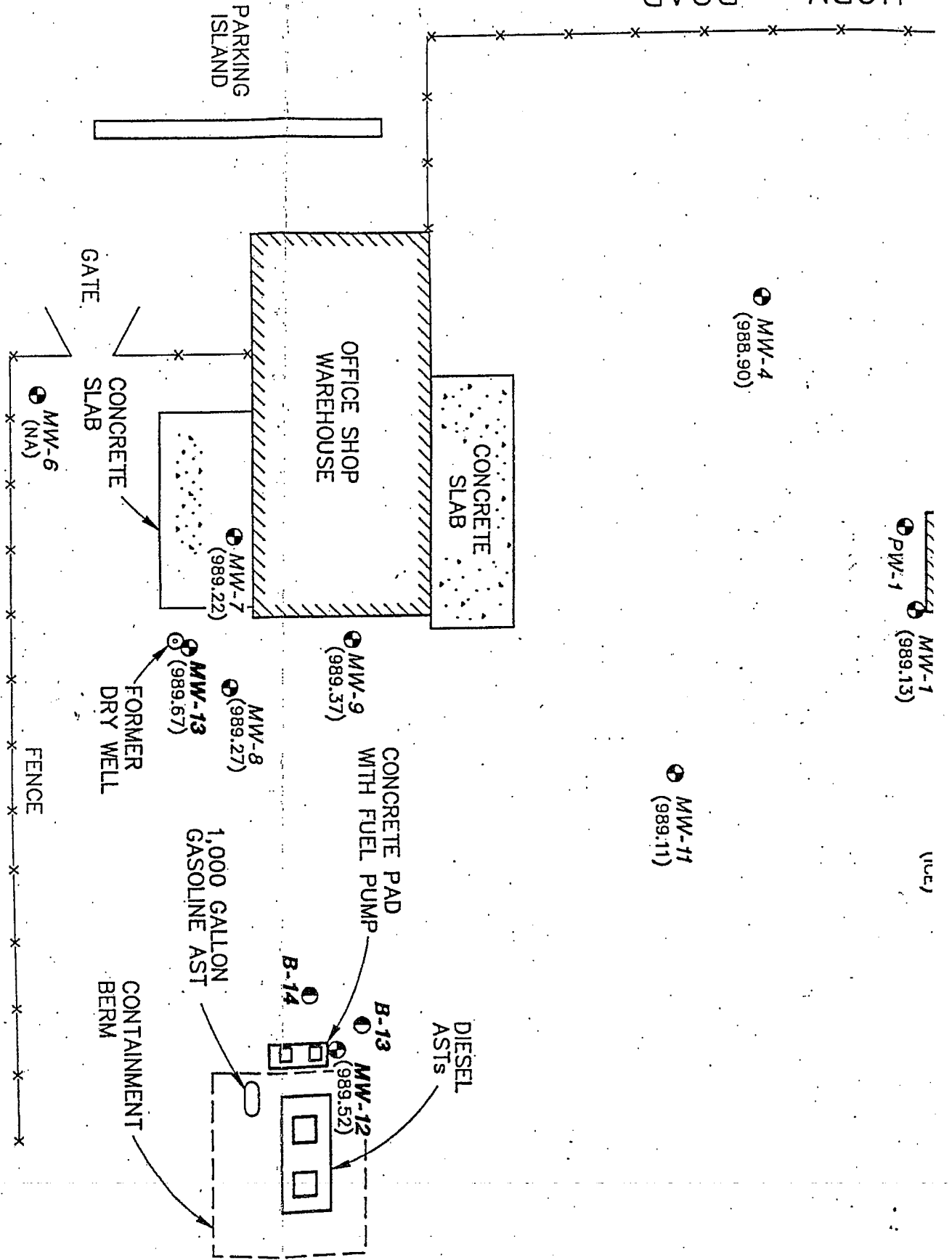
- MWII ⊕ 1990 AN/E MONITORING WELL LOCATION
- S-9 • SOIL SAMPLE LOCATION
(~5.5' bgs) DEPTH BELOW GROUND SURFACE

⊕ MWII

GROUNDWATER GRADIENT
(APPROXIMATELY 0.001)



HORN ROAD

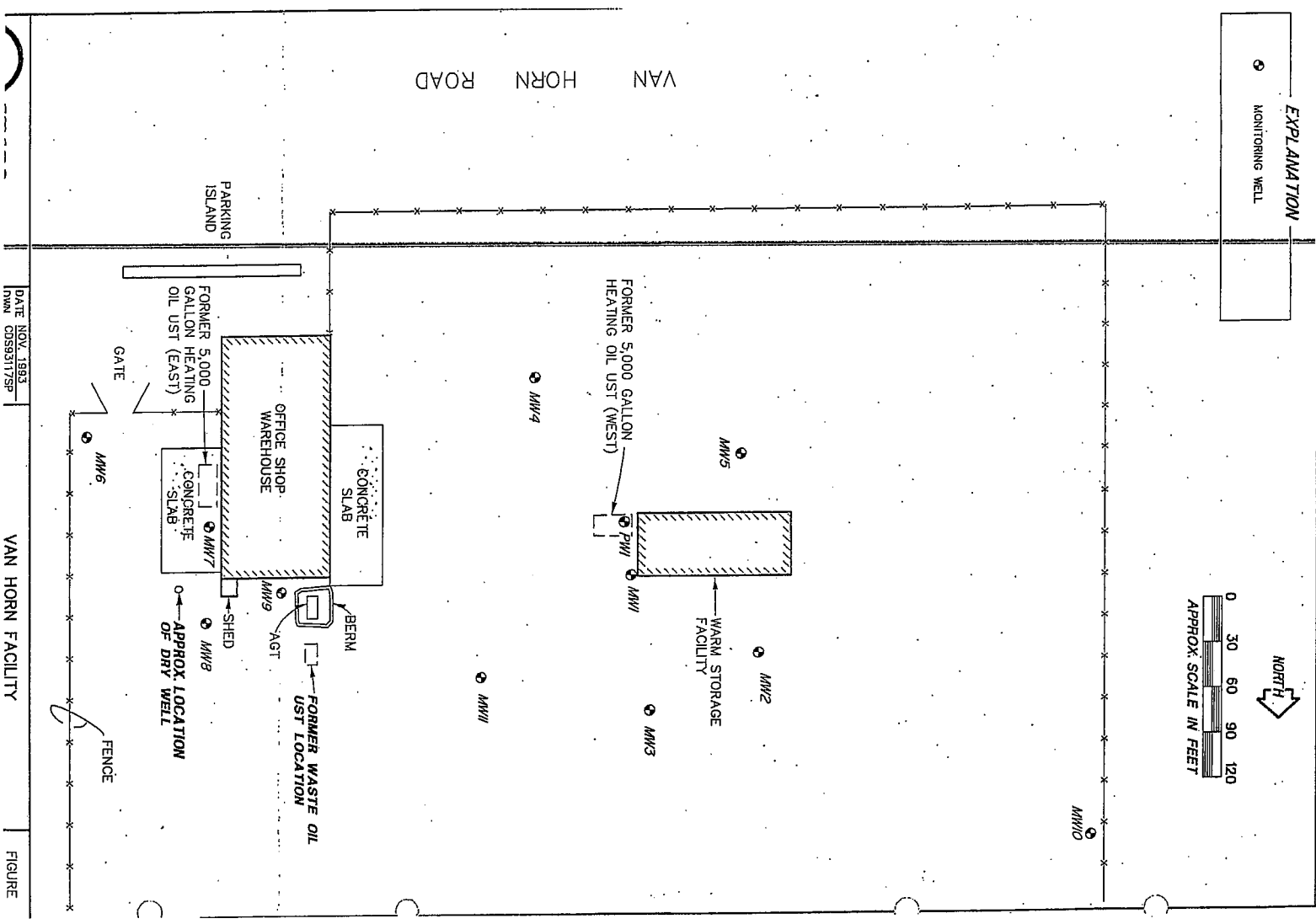
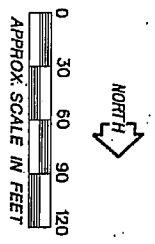


DATE OCT. 1994
DWN. CDS94026PB

VAN HORN FACILITY

FIGURE

EXPLANATION
 ● MONITORING WELL



VAN HORN FACILITY

FIGURE