STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 2264.26.021
Return Receipt Requested
Article No: 7008 1830 0002 6349 4647

June 24, 2010

Ben Olds
Maintenance and Operation Facility Director
Valdez School District
P.O. Box 398
Valdez, AK 99686

Re: Closure Decision Document; Hermon Hutchens Elementary School
Corrective Action Complete Determination

Dear Mr. Olds:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the Hermon Hutchens Elementary School. 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 the Hermon Hutchens Elementary School, which is located in the offices of the Alaska Department of Environmental Conservation 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 this Corrective Action Complete Determination.

Introduction

Site Name and Location:
Hermon Hutchens Elementary School
1009 West Klutina Street
Valdez, AK 99686

Name and Mailing Address of Contact Party:
Ben Olds
Maintenance and Operation Facility Director
Valdez School District
P.O. Box 398
Valdez, AK 99686

ADEC Site Identifiers
File#: 2264.26.021
Hazard ID: 25449

Regulatory authority under which the site is being cleaned up:
18 AAC 75 and 18 AAC 78

Background
In 2009, the Hermon Hutchens Elementary School converted an existing 15,000 gallon underground storage tank (UST) from a regulated UST containing generator fuel to an unregulated underground heating oil tank (HOT). During the change in service, petroleum impacted soil was encountered from soil borings collected below the tank. The HOT is currently in use.

Contaminant of Concern
During the investigation at this site, soil samples were analyzed for the following: diesel range organics (DRO); gasoline range organics (GRO); and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Diesel Range Organics

Cleanup Levels
The default 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.*

Contaminant	Site Cleanup Level (mg/kg)
Diesel Range Organics	230

Characterization Activities
In 2009, four soil samples were collected from three soil borings at an elevation below the bottom of the UST at 16 to 18 feet below ground surface (bgs). Soil samples contained DRO up to 249 mg/kg in one sample collected from a borehole adjacent to the fill pipe at 16 feet bgs. Perched water layers were encountered at 6.0, 7.8 and 11.5 feet bgs. A tank tightness test completed in 2010 indicates the tank is structurally sound and no leaks were detected.

Pathway Evaluation
Following investigation and cleanup at the site, exposure to the remaining contaminants were 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	No evidence of surface soil contamination was noted during previous investigations.
Sub-Surface Soil Contact	De Minimis Exposure	Sub surface soil samples collected were below direct contact cleanup levels.
Inhalation – Outdoor Air	De Minimis Exposure	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and no volatile compounds are present. Therefore risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and no volatile compounds are present. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	De Minimis Exposure	Only soil samples collected below the fill pipe contained DRO just above ADEC cleanup levels. A tank tightness test indicates the tank is structurally sound and is not leaking. Subsurface DRO contamination was most likely from drips during fuel filling activities; therefore the potential for the remaining contamination to impact groundwater is considered de minimis.
Surface Water Ingestion	Pathway Incomplete	Source areas are located more than 100 feet from surface water and surface water is not utilized as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals. This area is not used for harvesting wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at this site.

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 adequately address petroleum contaminated soil from the site. Based on the information available, ADEC has determined no further assessment and/or 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 soil disposal in accordance with 18 AAC 78.600(h) and 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 closure 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 decision document, please contact the ADEC Project Manager, Grant Lidren at (907) 269-8685.

Approved By,

Linda Nuechterlein
Environmental Manager

Recommended By,

Grant Lidren
Environmental Specialist