

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2100.26.569

Return Receipt Requested

Article No: 7009 2820 0001 7169 6668

November 24, 2010

Mark Corsentino
Project Management Supervisor
Municipality of Anchorage (MOA)
Anchorage Water & Wastewater Utility (AWWU)
3000 Arctic Boulevard
Anchorage, AK 99503

Re: Decision Document; MOA – AWWU – Maintenance Facility (1997 Tank Removal); Corrective Action Complete with Institutional Controls (ICs)

Dear Mr. Corsentino:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the MOA – AWWU – Maintenance Facility (1997 Tank Removal) site located at 325 East 94th Court, Anchorage, Alaska. Based on the information provided to date, 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 with institutional controls (ICs).

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 with ICs Determination.

Introduction

Site Name and Location:

MOA – AWWU – Maintenance Facility (1997 Tank Removal)
325 East 94th Court
Anchorage, Alaska 99515

Name and Mailing Address of Contact Party:

Mark Corsentino
Project Management Supervisor
Anchorage Water & Wastewater Utility (AWWU)
3000 Arctic Boulevard
Anchorage, AK 99503

ADEC Site Identifiers

File No.: 2100.26.569

Hazard ID No.: 25575

Regulatory authority under which the site is being cleaned up:

18 AAC 78 and 18 AAC 75

Background

Petroleum impacted soil was encountered during the 1997 removal of two 10,000-gallon gasoline underground storage tanks (USTs) and one 10,000-gallon diesel UST.

Contaminants of Concern

During the investigations at this site, soil and groundwater samples were analyzed for 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:

- 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 (MTG).

<u>Contaminant</u>	<u>MTG 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>Groundwater Cleanup Level (mg/L)</u>
DRO	1.5

Characterization and Cleanup Activities

In October 1997, two 10,000-gallon gasoline underground storage tanks (USTs) and one 10,000-gallon diesel UST were removed; and replaced with two aboveground storage tanks (ASTs). The dispensing island used by the former USTs was not removed during the UST closure and was connected to the new AST systems. Eleven confirmation soil samples and two duplicates were collected during the tank removals. DRO was the only analyte detected above ADEC cleanup levels at 390 milligrams per kilogram (mg/kg).

Approximately 20 cubic yards of contaminated material was removed during the tank excavations and transported to Alaska Soil Recycling (ASR) in Anchorage, Alaska for thermal treatment and disposal in 1997.

To evaluate the contaminant concentrations in groundwater, four monitoring wells were installed in 1998. Groundwater was encountered at approximately 8 feet below ground surface, and no hydrocarbon sheen or odor were observed during the installations. Soil samples collected during monitoring well installation did not contain contaminants above ADEC cleanup levels.

DRO was detected in groundwater at concentrations up to 1.5 milligrams per liter (mg/L) in the initial sampling in 1998. Groundwater samples were then collected quarterly through 1999 and analyzed for DRO, GRO and BTEX. Those results showed that all analytes were below ADEC 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

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	Contaminated surface soil was removed and treated; and clean fill was used to backfill the excavation.
Sub-Surface Soil Contact	De-Minimis Exposure	Contaminated sub-surface soil has been excavated and confirmation samples indicate the remaining sub-surface contamination is well below the ingestion/dermal contact cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	The contaminant remaining in the sub-surface soil is non-volatile, and at a concentration well below the inhalation cleanup level.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	The contaminant remaining in the sub-surface soil is non-volatile, and at a concentration well below the inhalation cleanup level.
Groundwater Ingestion	De-Minimis Exposure	Contaminants were not detected above groundwater cleanup levels. Groundwater is not used as a source for drinking water in this area.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.

Wild Foods Ingestion	Pathway Incomplete	This site is in a well developed urban area and not used as a source for wild foods collection.
Exposure to Ecological Receptors	Pathway Incomplete	The contaminated soil has been excavated and treated. There is no exposure 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

Contamination remains on site above established default cleanup levels; however ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be issued a Corrective Action Complete with 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 Municipality of Anchorage shall report to ADEC every five years to document land use, or report as soon as the Municipality of Anchorage 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. Future installation of groundwater wells will require approval from ADEC.
3. The groundwater monitoring wells that remain on site must be decommissioned by September 30, 2011, in accordance with ADEC guidance and an approved workplan.
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.

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 Corrective Action Complete Determination, the Institutional Controls will be terminated.

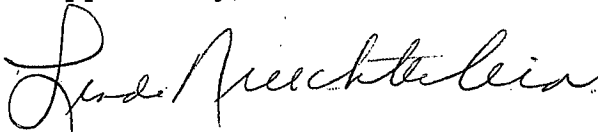
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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, Pam Clemens at (907) 269-7551.

Approved By,



Linda Nuechterlein
Environmental Manager

Recommended By,



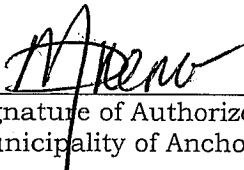
Pam Clemens
Environmental Program Specialist

Attachments:

- A: Institutional Controls (ICs) Agreement and Signature Page
- B: Site Figure

Attachment A: Corrective Action Complete-ICs Agreement and Signature Page*

Anchorage Water & Wastewater Utility (AWWU) agrees to the terms of this Corrective Action Complete with ICs Determination as stated in this Closure Decision Document dated **November 24, 2010** for the MOA – AWWU – Maintenance Facility (1997 Tank Removal) site. 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 18 AAC 78.276(f).

 Mark Bremd, General Manager
Signature of Authorized Representative, Title
Municipality of Anchorage, Anchorage Water & Wastewater Utility (AWWU)

MARK BREMD, General Manager
Printed Name of Authorized Representative, Title
Municipality of Anchorage, Anchorage Water & Wastewater Utility (AWWU)

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.**

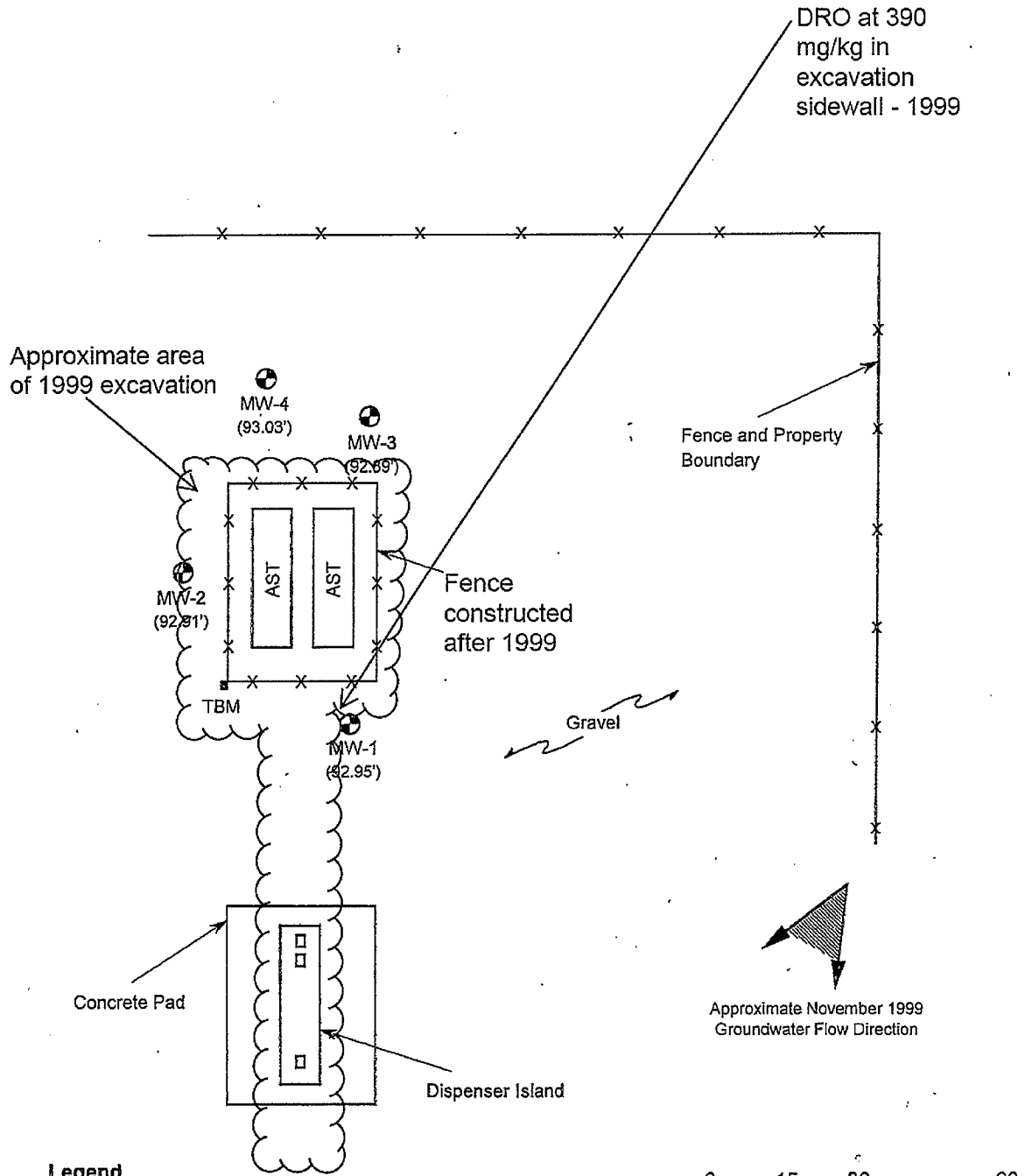
ADEC File #: 2100.26.569
Hazard ID#: 25575
ADEC Project Manager: Pam Clemens

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.

Attachment B: Site Figure



Legend

- Temporary Bench Mark (TBM) assumed elevation of 100.00 feet above sea level.
- ⊕ Approximate location and number of monitoring well. Water level elevation of 92.95 feet based on TBM.



325 East 94th Avenue Anchorage, AK
 MOA AWWU Maintenance Facility
 Site Figure