

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

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

File No: 1200.38.057
Certified Mail Return Receipt
Article No: 7009 2820 0001 7169 6712

January 10, 2011

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

Re: Decision Document; Alyeska VMT West Metering Building
Cleanup Complete Determination-Institutional Controls

Dear Mr. Anthony:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the project file and environmental records associated with the Alyeska VMT West Metering Building, located at Valdez Marine Terminal in Valdez. 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 no further remedial action will be required as long as the site is in compliance with established institutional controls.

This letter, which is based on the administrative record for the VMT West Metering Building, 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 with Institutional Controls (ICs) determination.

Introduction

Site Name and Location:

Alyeska VMT West Metering Building
Valdez Marine Terminal
Valdez, Alaska 99686

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Name and Mailing Address of Contact Party:

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

ADEC Site Identifiers

File: 1200.38.057
Hazard ID: 25525

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

During a construction project in November 2009, crude oil-contaminated soil was discovered beneath the pipe headers at the West Metering Building at the Valdez Marine Terminal (VMT). An immediate response was conducted and additional effort was planned for 2010. The source of the contamination is believed to be a historic release.

Site Characterization and Cleanup Actions

During July and August of 2010, about 238 cubic yards of contaminated soil were removed. The extent of excavation was limited by bedrock. One confirmation sample exceeded ADEC's most conservative Migration to Groundwater Cleanup criteria with a benzene concentration of 0.148 mg/kg. Aquazyme was added to the excavation before it was backfilled to enhance bioremediation of remaining contamination.

Contaminants of Concern

During the investigations at the site, soil samples were analyzed for the following contaminants: benzene, toluene, ethylbenzene, and xylenes (BTEX); gasoline range organics (GRO); diesel range organics (DRO); residual range organics (RRO); volatile organic carbons (VOCs); and polynuclear aromatic hydrocarbons (PAHs).

Groundwater was not sampled as part of this effort. Although groundwater was encountered earlier in excavation activities, final excavation depth was to bedrock, and groundwater was not present at the end of excavation activities. Groundwater is connected to surface water within the VMT area, and downgradient surface water monitoring has not had any detections for benzene in more than 5 years.

Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified.

- Benzene

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2 Under 40 inch Zone, Migration to Groundwater (MTG).

<u>Contaminant</u>	<u>MTG Site Cleanup Level (mg/kg)</u>
• Benzene	0.025

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

<u>Contaminant</u>	<u>MTG Site Cleanup Level (mg/L)</u>
• Benzene	0.005

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	Remaining contaminant concentrations are below ADEC's direct contact cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Remaining contaminant concentrations in the subsurface are below ADEC's direct contact cleanup levels.
Inhalation – Outdoor Air	De-minimis exposure	The remaining soil contaminant concentrations are well below the inhalation levels for benzene, and no other volatile compounds are present at levels exceeding any applicable criteria. Therefore, the contamination remaining is considered de minimis in extent, and risk is considered insignificant.

Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	The remaining soil contaminant concentrations are well below the inhalation levels for benzene, and no other volatile compounds are present at levels exceeding any applicable criteria; therefore risk via this pathway is considered insignificant. Closest existing structures are more than 30 feet away or not entirely in contact with ground surface. Soil contamination remaining is at depth with clean fill above which will mitigate future risk via this pathway.
Groundwater Ingestion	De-minimis exposure	Groundwater is connected to surface water before leaving the VMT, and downgradient surface water monitoring has not detected these compounds. Drinking water in the area comes from an upgradient freshwater source; therefore, exposure via this pathway is considered de minimis.
Surface Water Ingestion	Pathway Incomplete	Downgradient surface water in the area is not used for drinking water purposes.
Wild Foods Ingestion	Pathway Incomplete	Site is an industrial facility and contaminants of concern do not have the potential to bioaccumulate in plants or animals; therefore, this pathway is considered incomplete.
Exposure to Ecological Receptors	Pathway Incomplete	Site is an industrial area covered with shotrock and there is no evidence of off-site migration; 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

The 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 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. Installation of groundwater wells will require approval from ADEC.
3. 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.)
4. 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 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,



Linda Nuechterlein
Environmental Program Manager

Recommended By,



Keather McLoone
Environmental Program Specialist

Attachment A: Cleanup Complete-ICs Agreement Signature Page
Attachment B: Site Figure

Cc: Scott Rose, SLR

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

Alyeska Pipeline Services Company agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision Document dated **January 10, 2011** for the Alyeska VMT West Metering Building; Hazard ID: 25525. 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 75.380(d).

Signature of Authorized Representative, Title
Alyeska Pipeline Services Company

Printed Name of Authorized Representative, Title
Alyeska Pipeline Services 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, Keather McLoone at the address on this correspondence within 30 days of receipt of this letter.

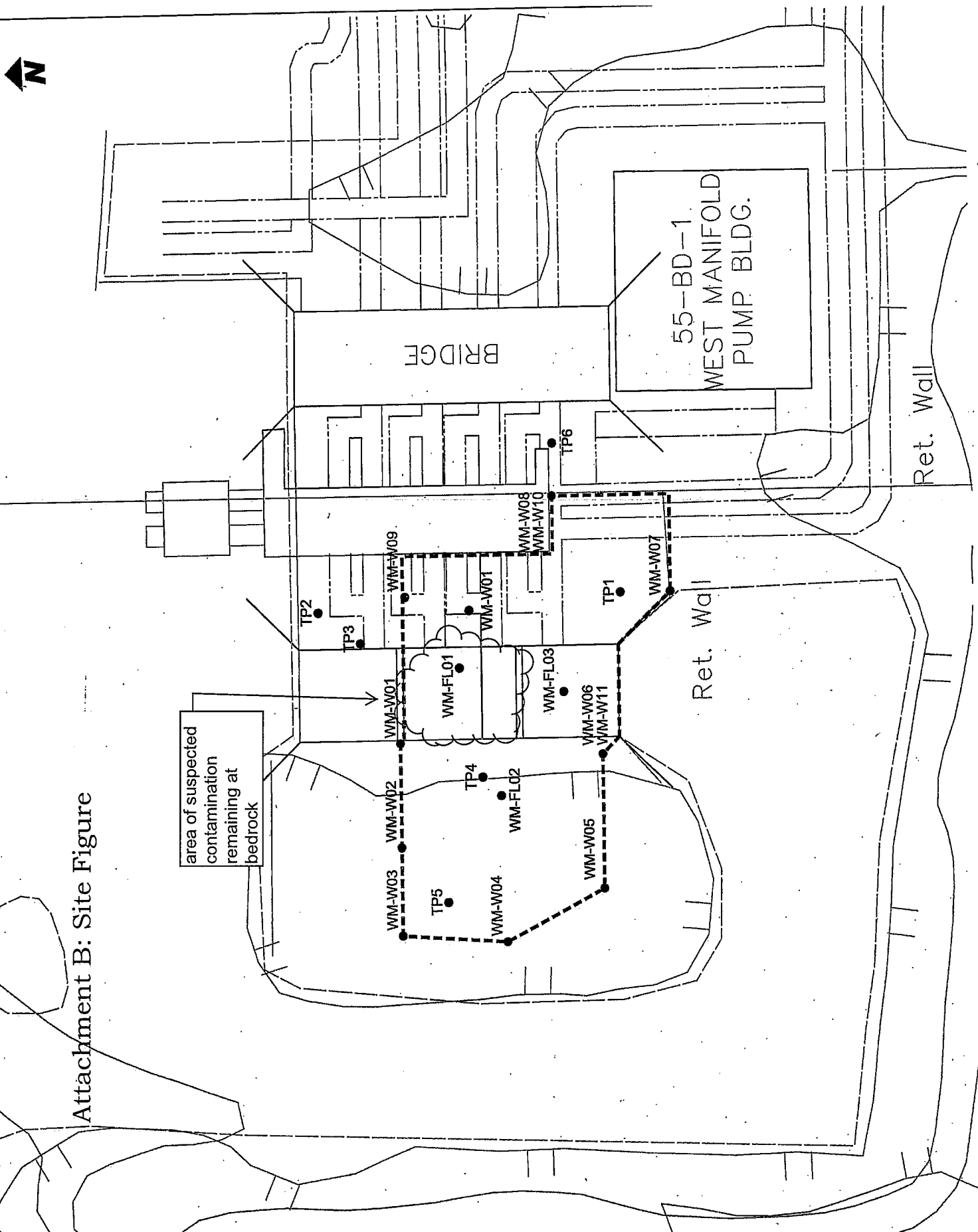
ADEC File No. 1200.38.057
Hazard ID: 25525
ADEC Project Manager: Keather McLoone

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.

Attachment B: Site Figure



THIS DRAWING IS FOR CONCEPTUAL PURPOSES ONLY. ACTUAL LOCATIONS MAY VARY AND NOT ALL STRUCTURES ARE SHOWN.