STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-3057
FAX: (907) 269-7649
www.dec.state.ak.us

File: 2100.26.313
Return Receipt Requested
Article No: 70102780000021784711

June 15, 2011

Dave Grubbs, Project Manager
Municipality of Anchorage
Maintenance and Operations
3640 East Tudor Road Warehouse #1
Anchorage, Alaska 99507-1252

Re: Decision Document; MOA-Muldoon Transit Facility
Corrective Action Complete Determination

Dear Mr. Grubbs:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the MOA-Muldoon Transit Facility environmental records which are located in the offices of the ADEC in Anchorage, Alaska. 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 this site will be closed.

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
MOA – Muldoon Transit Facility
109 Muldoon Road
Anchorage, Alaska

Name and Mailing Address of Contact Party:
Dave Grubbs, Project Manager
MOA Maintenance and Operations
3640 East Tudor Road Warehouse #1
Anchorage, Alaska 99507-1252

ADEC Site Identifiers:
Hazard ID #24266
Facility ID# 1403
CS file # 2100.26.313

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

Background
Hydrocarbon contamination in soil was noted in 1992 during the removal of a 1,000-gallon diesel fuel underground storage tank (UST) and a 500-gallon diesel fuel UST from a common excavation.

Contaminants of Concern
During the various investigations at this site, soil samples were analyzed for extractable petroleum hydrocarbons (EPH), which is roughly equivalent to diesel range organics (DRO), volatile petroleum hydrocarbons. Soils were also analyzed for (VPH) which is roughly equivalent to gasoline range organics (GRO); and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on the results of these investigations, 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, Table B2, Under 40 Inch Zone, Migration to Groundwater (MTG).

Contaminant	MTG Site Cleanup Level (mg/kg)
• DRO	250

Site Characterization and Cleanup
The two regulated underground storage tanks (USTs) at this site were removed from a common excavation in 1992. Confirmation soil samples collected from the bottom and sides of the excavation contained DRO up to 810 mg/kg.

Additional excavation was conducted in 1994 to remove the remaining hydrocarbon contaminated soil. The excavation reached approximately 9-10 feet bgs. Confirmation samples collected from the bottom and sides of the excavation contained DRO up to 19 mg/kg. Groundwater was not encountered in the bottom of either excavation.

Eighty-four cubic yards of hydrocarbon contaminated soil were stockpiled on site. After sampling indicated hydrocarbon concentrations were below the most stringent migration to groundwater (MTG) cleanup levels, the stockpiled soil was spread on site in 2006.

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 Pathway Evaluation

Pathway	Result	Explanation
Direct Contact with Surface Soil	Pathway Incomplete	Contaminated soil has been removed from the surface.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	The remaining contaminated soil is below the most stringent MTG site cleanup levels.
Inhalation-Outdoor Air	De Minimis Exposure	Remaining contamination is below the most conservative site cleanup levels, therefore risk is insignificant.
Inhalation-Indoor Air	Pathway Incomplete	Remaining contamination is below the most conservative site cleanup levels, and covered by clean fill. Furthermore, occupied buildings are not located near the site.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered in the excavation and bottom samples did not contain contaminants above the migration to groundwater cleanup levels
Surface Water Ingestion	Pathway Incomplete	Surface water in the area is not used for drinking water purposes.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at the 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 excavate and adequately remove contaminated soil from the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required because this site meets the most conservative Method Two, Table B2, Under 40 Inch Zone, Migration to Groundwater (MTG) cleanup levels. There is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Cleanup Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75.325(i). 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 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.

If you have questions about this closure decision, please contact ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,

Linda Nuechterlein
Environmental Manager

Recommended By,

William O'Connell
Environmental Program Specialist