

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

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

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-8685
FAX (907) 269-7649

File No: 2404.38.011
Return Receipt Requested
Article No: 7010 2780 0000 2178 4834

July 27, 2011

Charles Parker, President/CEO
Alaska Village Initiatives
1577 C Street, Suite 304
Anchorage, AK 99501

Re: Decision Document: Alaska Commercial Properties - Aniak
Cleanup Complete Determination

Dear Mr. Parker:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP), has completed a review of the environmental records associated with the Alaska Commercial Properties - Aniak. Based on the information provided to date and the administrative record, 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 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 Cleanup Complete Determination.

Introduction

Site Name and Location:

Alaska Commercial Properties - Aniak
2nd Street
Aniak, AK 99557

Name and Mailing Address of Contact Party:

Charles Parker, President/CEO
Alaska Village Initiatives
1577 C Street, Suite 304
Anchorage, AK 99501

ADEC Site Identifiers:

ADEC Reckey: 1994250109003
File #: 2404.38.011
Hazard ID: 2110

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

In 1996, diesel impacted soil encountered from numerous source areas throughout the property was excavated and put into a 950 cubic yard onsite biocell. As indicated by a letter dated November 25, 1996, the CSP approved closure for the site; however an institutional control (IC) was put on the property to regulate the onsite biocell (see Attachment 1).

Contaminants of Concern

During the investigations at this site, soil and water 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 Contaminants of Concern were identified:

- Benzene
- 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, under 40 inch Zone, *Migration to Groundwater (MGW)*.

<u>Contaminant</u>	<u>MGW Cleanup Level (mg/kg)</u>
Benzene	0.025
Diesel Range Organics	250

Site Characterization and Cleanup Actions

In 1997, eight soil samples collected 1.5 feet into the onsite biocell contained diesel range organics (DRO) up to 200 mg/kg which is below the current most conservative ADEC cleanup level of 250 mg/kg. The CSP determined the contaminated soil had been successfully remediated and approval was given to decommission the biocell in 1998. Decommissioning activities of the biocell involved removing the liner, landspreading the soil onsite, capping with 4 inches of soil from the biocell's berm walls, and reseeded with grass.

Historic data suggests the former pump house area may contain benzene contamination up to 0.15 mg/kg. However, further review of the file confirmed that this area was excavated and sampled again in 1996 for diesel range organics (DRO) and gasoline range organics (GRO). DRO and GRO were not detected in the 1996 sample results. The excavation has been brought back to grade with clean fill.

Furthermore, the Alaska Commercial property drinking water well was sampled in 2010 as part of a state-lead Aniak Airport Groundwater Study. There were no detections of hydrocarbon contamination in the drinking water sample which further indicates that contamination did not migrate to groundwater.

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	Confirmation surface soil samples were below direct contact cleanup levels and de minimis in volume. Therefore risk via this pathway is insignificant.
Sub-Surface Soil Contact	De Minimis Exposure	Confirmation sub-surface soil samples were below direct contact cleanup levels and de minimis in volume. Therefore risk via this pathway is insignificant.
Inhalation – Outdoor Air	De Minimis Exposure	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and benzene; and de minimis in volume. 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 benzene; covered with clean fill; and de minimis in volume. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	De Minimis Exposure	The source area and contaminated soil have been removed. Remaining soil contamination is considered de minimis. In 2010 the Alaska Commercial property drinking water well was sampled as part of a state lead Aniak Airport Groundwater Study. The drinking water sample was non-detect; therefore, risk via this pathway is considered insignificant.
Surface Water Ingestion	De Minimis Exposure	The source area and contaminated soil have been removed. Remaining soil contamination is considered de minimis. In 2010 the Alaska Commercial property drinking water well was sampled as part of a state lead Aniak Airport Groundwater Study. The drinking water sample was non-detect. Risk via this pathway is considered insignificant.
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 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 and the Institutional Control is hereby removed from the site there is no longer a risk to human health or the environment and the site will be designated as Cleanup Complete 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 the ADEC Project Manager, Grant Lidren at (907) 269-8685.

Approved By,



Linda Nuechterlein
Environmental Manager

Recommended By,



Grant Lidren
Environmental Specialist

Attachments: 1996 Letter to Alaska Village Environmental Services

CC: Monica Fassoth, F&H Holdings LLC

Attachment: 1

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

Division of Spill Prevention and Response
Contaminated Sites Remediation Program
555 Cordova Street
Anchorage, Alaska 99517

November 25, 1996
FAX 269-7649

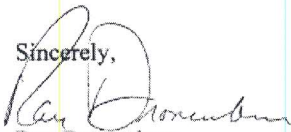
Alaska Village Environmental Services, Inc.
1577 C Street, Suite 304
Anchorage, Alaska 99501
Mr. Perry Eaton, President

Re: Alaska Commercial Co. Stores (Alaska Village Initiatives); cleanup for Aniak

Dear Mr. Eaton,

The Department has reviewed those data submitted for work accomplished in Aniak during the summer 1996 and which represent closure for that site.

The Department concurs that individual contamination sites listed as A through H in a Montgomery Watson preliminary assessment (1995) are approved for closure. The contaminated sites stockpile will be put on an "institutional control" status which will require sampling, at your discretion, for closure. Sampling must be conducted by an independent third party and analyzed by a certified laboratory.

Sincerely,

Ray Dronenburg

cc: File