STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

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File: 2323.38.053

April 11, 2012

Jennifer Lindberg
Environmental Impact Analyst II
Alaska Department of Transportation & Public Facilities
P.O. Box 196900 MS-2525
Anchorage, AK 99519-6900

Re: Decision Document; ADOT&PF North Kenai Maintenance Facility Class V Injection Well Cleanup Complete Determination

Dear Ms. Lindberg:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the ADOT&PF North Kenai Maintenance Facility Class V Injection Well site, located in Nikiski, 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. No further cleanup action is required at this time.

This decision is based on the administrative record for this site, which is located in the offices of the ADEC in Soldotna, 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 Cleanup Complete determination.

Introduction

Site Name and Location:

ADOT&PF North Kenai Maintenance Facility Class V Injection Well 51150 Island Lake Road Nikiski, Alaska 99635

Name and Mailing Address of Land Owner:
Alaska Department of Transportation & Public Facilities
P.O. Box 196900 MS-2525
Anchorage, AK 99519-6900

ADEC Site Identifiers

File:

2323.38.053

Hazard ID:

25641

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

Background

The ADOT&PF North Kenai Maintenance Facility was constructed in 1967 and used for vehicle maintenance. It is currently used for the storage of snow removal equipment. The facility included five floor drains within the shop building which were tied in with the domestic wastewater from the facility to the common septic tank soil absorption system. The drains were plumbed through a two-compartment oil/water separator prior to connecting with the facility's domestic wastewater system that was connected to a single bathroom, and then discharged into a septic tank/soil absorption system. In 2009 the original soil absorption system failed. The system was taken out of service, with the septic tank then being used as a holding tank and routinely pumped by a local septage pumping business. In 2010 a new septic tank/soil absorption system and a shop floor drain wastewater holding tank was installed for the facility. After these new systems were installed, the original septic tank/soil absorption system was removed. The original soil absorption system was classified as a Class V Injection Well by the U.S. EPA.

Site Characterization and Cleanup Actions

On August 23, 2010, the removal and closure of the Class V Injection Well was performed. There was visual evidence that grease and/or heavy lube oil had been discharged into the septic tank/soil absorption system. Approximately 120 cubic yards of contaminated soil was excavated and stockpiled on site. These soils remain stockpiled on site at this time. Confirmation soil samples collected in the excavation confirmed that the petroleum hydrocarbon contamination had successfully removed. The excavated soils stockpiled on site were sampled and diesel range organics (DRO) contamination at concentrations of 254 and 624 mg/kg were detected within the stockpile. Arsenic was detected in the excavation and the stockpiled soil exceeding ADEC cleanup levels at concentrations of 3.96 to 5.44 mg/kg. Although the sample results for arsenic exceed the ADEC cleanup level, these concentrations are consistent with naturally occurring background concentrations in this area.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for DRO, gasoline range organics (GRO), residual range organics (RRO), benzene, ethylbenzene, toluene, and xylenes (BTEX), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polycyclic aromatic hydrocarbons (PAHs). Following the completion of the assessment and cleanup measures employed at this site, residual concentrations of the following Contaminants of Concern remained in the excavated soil stockpile, in excess of the ADEC Cleanup Levels:

Diesel Range Organics (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'.

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

Pathway Evaluation

Following investigation and cleanup at the site, exposure to any remaining contamination 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 current pathways to be one of the following: De-minimis Exposure, 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-minimus Exposure	Residual contamination in surface soil is below ADEC 'ingestion' and 'direct contact' soil cleanup levels.
Sub-Surface Soil Contact	De-minimus Exposure	Soil contamination was removed from the sub- surface during the excavation of the former Class V Injection Well (soil absorption system removal).
Inhalation – Outdoor Air	De-minimus Exposure	Residual contamination in surface and sub-surface soil is below ADEC 'inhalation' soil cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-minimus Exposure	Indoor air is unlikely to be affected by the minimal mass of DRO identified in the excavated soils which were landspread onsite.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered, and is not believed to have been impacted. The facility onsite drinking water well is more than 100 feet deep.
Surface Water Ingestion	Pathway Incomplete	Residual contaminant migration to adjacent wetland areas or surface waters is not anticipated.
Wild Foods Ingestion	Pathway Incomplete	Wild food harvest on this property is unlikely, and contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Residual contamination has no potential to impact terrestrial or aquatic receptors.

Notes to Table 1: "De-minimis Exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal mass of remaining contamination. "Pathway Incomplete" means that in ADEC's judgment, contamination has no potential to contact receptors.

ADEC Decision

Based on the most recent soil samples collected at this site, soil contamination remains on site above established default soil cleanup levels. However, ADEC has determined that this site does not pose an unacceptable risk to human health or the environment, subject to appropriate

conditions. Therefore, we are issuing this 'Cleanup Complete' decision, subject to the following condition:

1. Approximately 120 cubic yards of stockpiled contaminated soil remains on site. Based on the soil concentrations within the stockpile, the soils must now be spread on this property in an upland area at least 100 feet from any drinking water well and any surface water. The soil shall be spread on the ground surface in a lift that is no more than six inches thick, to facilitate biodegradation of any residual DRO contamination. The Alaska Department of Transportation shall provide written documentation of the date and the location where the soils were spread on the property to ADEC following the spreading of the soils, by August 1, 2012.

Although a Cleanup Complete determination has been granted, ADEC approval is required for off-site soil disposal of these landspread soils, in accordance with 18 AAC 78.325(i). It should also 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.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status to 'Cleanup Complete', and will include a description of the residual contamination remaining at the site.

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 Cleanup Complete decision, or any other aspect of this project, please contact me at (907) 262-3412, or via e-mail at peter.campbell@alaska.gov

Approved By,

Paul Horwath

Environmental Engineer

Recommended By,

Peter Campbell

Environmental Program Specialist

Cc: Alton Gilbert, Building Maintenance Manager, ADOT&PF, Anchorage Larry Miller, ADOT&PF M&O, Soldotna John M. Hargesheimer, PE, CIH, NORTECH Environmental Engineering