STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 2113.38.001
Return Receipt Requested
Article No: 7010 2780 0000 2178 4247

November 22, 2011

Mr. Daniel Carrier
Chevron Environmental Management Company
Retail & Terminal Business Unit
145 South State College Boulevard, Room 4086
Brea, CA 92821

Re: Closure Decision Document; UNOCAL – Portage Bulk Plant 0604,
Cleanup Complete Determination

Dear Mr. Carrier:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the UNOCAL – Portage Bulk Plant 0604 site. Based on the information provided to date, 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 decision is based on the administrative record which is located in the offices of the Alaska Department of Environmental Conservation in Anchorage, 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:
UNOCAL – Portage Bulk Plant 0604
Mile 78.8 Seward Highway
Girdwood, AK 99587
USGS Seward D-6, SE Quadrangle, Sections 5 and 6

Name and Mailing Address of Contact Party:
Mr. Daniel Carrier
Chevron Environmental Management Company
Retail & Terminal Business Unit
145 South State College Boulevard, Room 4086
Brea, CA 92821

ADEC Site Identifiers
File#: 2113.38.001
Hazard ID: 2008

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

Background
US Survey 3188, Lot 3, T8N, R3E, Sec 5

Characterization Activities
In 1993, petroleum contamination of soil and groundwater was documented during a preliminary assessment adjacent to the site property. Up to 520 mg/kg GRO, 610 mg/kg DRO, and 1.2 mg/kg benzene was found in the soil samples collected. Up to 18 mg/l GRO, 9.8 mg/l DRO, and 0.17 mg/l benzene was found in the groundwater. The on-property drinking water well was sampled and found to be non detect for contamination.

In 2001, nine soil borings were sampled and completed as monitoring wells at the site to help determine the nature and extent of the contamination. Up to 9,840 mg/kg DRO, 2,110 mg/kg GRO, and 2.19 mg/kg benzene was found in the soil. Up to 24 mg/l GRO, 8.54 mg/l DRO and 0.0241 mg/l benzene was detected in the groundwater.

In 2002, thirteen test pits were sampled which had up to 5,840 mg/kg DRO, 4,090 mg/kg GRO, and 2.99 mg/kg benzene. Later in 2002, approximately 1,308 tons of contaminated soil was excavated and transported off site for thermal treatment. Confirmation sampling documented that only one small area near the cafe building foundation had contamination (1,590 mg/kg DRO) left above the most stringent (i.e., migration to groundwater) 18 AAC 75.341 clean up levels. Three monitoring wells were installed to replace the monitoring wells that were removed during the 2002 excavation of the contaminated soil.

On October 13, 2003, a no further remedial action letter was issued by ADEC that required long-term groundwater monitoring. On October 22, 2008 four soil borings were sampled to assess current soil contamination concentrations. These samples were all non-detect for DRO, GRO and benzene. On March 31, 2009 ADEC approved suspending groundwater monitoring at the site. On June 11, 2010, ADEC received documentation that the remaining onsite monitoring wells had been decommissioned in accordance with the approved plan.

Contaminants of Concern

During the investigation at this site, soil 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 (COCs) were identified:

- DRO
- GRO
- Benzene

However, no COCs remain on site above ADEC's most stringent soil cleanup levels established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater (MTG) *Under 40 Inch Zone* .

Cleanup

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
DRO	250
GRO	300
Benzene	0.025

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

Contaminant	Site Cleanup Level (mg/L)
DRO	1.5
GRO	2.2
Benzene	0.005

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	Pathway Incomplete	The contaminated surface soil was removed during the initial excavation.
Inhalation – Outdoor Air	Pathway Incomplete	The volatile organic compounds were non-detect in the confirmation samples.

Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	The volatile organic compounds were non-detect in the confirmation samples.
Groundwater Ingestion	De-Minimis Exposure	Groundwater samples were analyzed for BTEX, DRO, and GRO and are now below default cleanup levels and are considered De-Minimis in volume. Therefore risk via this pathway is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	This area is not used for harvesting wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	This area does not have 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

The cleanup actions to date have served to adequately address petroleum contaminated soil from the site. Based on the information available, ADEC has determined no further assessment and/or cleanup action is required. There is no unacceptable risk to human health or the environment, and this 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) and 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.

Cost Recovery

The responsibility for the investigation and cleanup of hazardous substance contamination is established by state law. The owner and/or operator that caused the release of the hazardous substance(s) is responsible for its cleanup (Alaska Statutes 46.03.822). However, if the responsible party is not the owner of the property and/or is not willing or able to conduct the necessary cleanup actions, the landowner is liable for the cost of the cleanup actions. If you believe that another party is responsible for the contamination (e.g., a past owner or operator of the site), please provide this information to the ADEC Project Manager assigned to your site. State law requires ADEC to recover the costs associated with our oversight work from the responsible party/parties (AS 46.03.010 and AS 46.08.070). This may include conducting site inspections and any time associated with reviewing work plans.

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 decision document, please contact the ADEC Project Manager, Robert Weimer at (907) 269-7525.

Approved By,

Rich Sundet
Environmental Manager

Recommended By,

Robert Weimer
Environmental Specialist

cc: John Riggi, CRA - Denver
Kamie Willis, Cost Recovery Coordinator, Dept. of Law / Anchorage