THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File No: 2601.38.114
Return Receipt Requested
Article No: 7012 1010 0003 0389 0528

August 8, 2013

Jennifer Richcreek
Kodiak Electric Association
P.O. Box 787
Kodiak, Alaska 99615

Re: Decision Document; Commercial Property - 1614 Mill Bay Road
Cleanup Complete Determination

Dear Ms. Richcreek;

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the Commercial Property - 1614 Mill Bay Road site. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

Site Name and Location:

Commercial Property
1614 Mill Bay Road
Kodiak, Alaska 99615

Name and Mailing Address of Contact Party:

Jennifer Richcreek
Kodiak Electric Association
P.O. Box 787
Kodiak, Alaska 99615

ADEC Site Identifiers:
File: 2601.38.114
Hazard ID: 25992

Regulatory Authority for Determination:
18 AAC 75

Background

During the removal of an underground heating oil tank (HOT) in 2012, petroleum-contaminated soil was discovered at the fill pipe and from leaks on the west end on the tank. The HOT was used to heat a building that was decommissioned and dismantled in 2012. This site is located in a mixed commercial/residential area; Kodiak Island Borough Property ID 14267.

Contaminant of Concern

During the investigations at the site, soil samples were analyzed for the following: diesel range organics (DRO); residual range organics (RRO); polycyclic aromatic hydrocarbons (PAHs); and the volatile organic compounds (VOCs) benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following contaminant of concern (COC) was identified in soil:

- DRO

ADEC Cleanup levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B1 and B2, *Over 40 Inch Zone.*

Table 1- Soil Cleanup Levels

Contaminant of Concern	Soil- Method Two, Direct Contact /Ingestion*	Soil- Method Two, Inhalation*	Soil- Migration to Groundwater*
DRO	8,250	12,500	230

Notes to Table 1. *All soil contaminant concentrations are presented in mg/Kg.

Site Characterization and Cleanup Actions

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 2012. During the removal of the HOT, 30 cubic yards (CY) of contaminated soil were excavated to a depth of eight feet below ground surface (bgs) and stockpiled onsite. Four confirmation soil samples collected contained DRO up to 706 mg/kg on the east side of the excavation, therefore an additional 10 CY were excavated. A confirmation soil sample collected 10 feet bgs from this area contained detectable concentrations of DRO, but below ADEC migration to groundwater cleanup levels. The excavation has since been capped with cleanfill and the 40 CY contaminated soil stockpile was transported to Alaska Soil Recycling for thermal remediation.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

Exposure Pathway Evaluation

Following investigation and cleanup at this site, exposure to remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Surface soil around the site has been excavated and brought to grade with clean gravel fill. Exposure through this pathway is considered incomplete.
Sub-Surface Soil Contact	De Minimis Exposure	Confirmation sub-surface soil samples were below ingestion cleanup levels. Therefore risk via this pathway is insignificant.
Inhalation – Outdoor Air	De Minimis Exposure	The remaining petroleum constituents are below inhalation cleanup levels. Therefore risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings on site and volatile compounds were not detected. Exposure through this pathway is considered incomplete
Groundwater Ingestion	De Minimis	Confirmation sub-surface soil samples were below migration to groundwater cleanup levels. Therefore risk via this pathway is insignificant.
Surface Water Ingestion	Pathway Incomplete	Surface water is not utilized as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	There are no complete exposure pathways to wild food ingestion at this site.
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 ground water use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

Remaining petroleum contamination in soil is below approved cleanup levels. This site will receive a "Closed" designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 78.600(h). 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.)

2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

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 Grant Lidren at (907) 269-8685.

Sincerely,

Grant Lidren
Environmental Program Specialist