STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

410 Willoughy Ave., Suite 303
Juneau, AK 99801-1795
PHONE: (907) 465-5210
FAX: (907) 465-5262
http://www.state.ak.us/dec/

File: 1513.26.056

May 13, 2003

Trena Hallback
Western Pioneer, Delta Western
1007 W 3rd Ave, Suite 303
Anchorage, Alaska, 99518-1621

Re: Groundwater Sampling Results/ No Further Action Decision
Aurora Fuel Dock, 1401 Harbor Way, Aurora Basin
Parcel number 1C020K010010, Owner ID #338
Facility 282, LUST Event 1221, Database Number 1995110029805

Dear Trena:

The Department of Environmental Conservation (ADEC) Juneau Office has recently completed a review of the file associated with the Delta Western Aurora Fuel Facility in Juneau. Based on our review of additional monitoring well data and inspection of the immediate shoreline, ADEC finds that the former locations of one 5,000-gallon and four 10,000-gallon underground storage tanks (USTs) at the referenced property do not pose a significant threat to human health or safety, or the environment.

Site Assessment
Site Assessment was performed at the time of removal of the one 5,000-gallon and four 10,000-gallon USTs by consultant Smith, Bayliss, LeResche, Inc. (SBL) on October 26, 1995. Soil from the excavation sidewalls and tank footprints were field screened for petroleum contamination and closure soil samples with duplicates collected as conditions allowed in accordance with the Storage Tank Procedures Manual and requirements under 18AAC 78.090. Laboratory analysis of the soil samples included gasoline range hydrocarbons (GRO), diesel range hydrocarbons (DRO), residual range hydrocarbons (RRO) and benzene, toluene, ethylbenzene, and xylene (BTEX) compounds. The Site Assessment was approved by the Department by letter on February 28, 1996.

Soil Remediation
Approximately 285 tons of contaminated soil and sediment were excavated and transported to Channel Landfill in Juneau for incineration.

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Subsurface Water
Subsurface water beneath the footprint of the former USTs meet the regulatory definition of groundwater under 18 AAC 75.990 referenced in 18 AAC 78.995 even if the water quality is predominantly of marine nature and non-potable. Inspection of the immediate shoreline by ADEC staff at low tide revealed no phreatic water seeps or observable petroleum sheen.

Long Term Monitoring
Final version of Groundwater Monitoring Plan Aurora Fuels, Aurora Boat Harbor, prepared by consultant Fluor Daniel GTI, Inc. was approved by Department letter dated December 11, 1997. Section 4 of the Plan stated that 18 AAC 70.020(b) Water Quality Standards are the cleanup levels for the site for groundwater at the perimeter of the property. Analytical sampling events of the sentinel monitoring well on December 19, 1997 and March 26, 1998 indicated that petroleum concentrations in subsurface water is reduced below the appropriate cleanup levels.

Cleanup Levels
Surface Water
Under 18AAC 70.015 Antidegradation Policy existing water use and the level of water quality necessary to protect existing use must be maintained and protected. Under 18 AAC 75.345(f), subsurface water having a hydrological connection to Aurora Harbor is subject to the Alaska Water Quality Standards (18 AAC 70) at an appropriate point of compliance. Applicable cleanup levels include total aqueous hydrocarbons (TAqH) at 15 micrograms per liter, and total aromatic hydrocarbons (TAH) at 10 micrograms per liter. The TAH criteria and the TAqH criteria in water samples collected from marine waters along the shoreline directly adjacent to the site must be met in order to show that the migration to surface water is protected.

Groundwater
Table C values listed under 18 AAC 75.345 are applicable for groundwater cleanup levels.

Soil
ADEC approved the Corrective Action Plan calling for Method One Category B on October 23, 1995.

Compound	*Cleanup Level*
GRO	100 mg/kg
DRO	200 mg/kg
Benzene	0.02 mg/kg
Toluene	4.8 mg/kg
Ethylbenzene	5.0 mg/kg
Xylenes	69.0 mg/kg

Cumulative Human Health Risk
For contamination that remains on-site following a cleanup, a chemical that is detected at one-tenth or more of the Table B1 inhalation or ingestion values set out in 18 AAC 75.341(c) or the Table B2

values set out in 18 AAC 75.341(d) must be included when calculating cumulative risk under 18 AAC 75.325(g). No contaminants included in petroleum cumulative risk calculations were detected at concentrations equal to or greater than one-tenth the risk-based ingestion or inhalation levels.

Determination
The investigation and cleanup of the contamination associated with the five USTs at the Aurora Fuel Dock property has met all requirements specified in 18 Alaska Administrative Code (AAC) 75 Article 3 - Discharge, Reporting, Cleanup, and Disposal of Oil and Other Hazardous Substances and 18 AAC 78, Underground Storage Tanks. Based on the information provided by your consultants, groundwater use at the site and in the area, and human health and ecological risks, ADEC agrees that no further remedial action is required. Record of this Decision Letter is posted on the Department database and the site given a closed status.

Closure
In accordance with 18 AAC 75.380(d)(1) and 18 AAC 78.276, additional investigation and cleanup may be required if new information is discovered which leads ADEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195- 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 of the permit decision. **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 of this decision letter. If a hearing is not requested within 30 days, the right to appeal is waived.

Please contact me with questions or concerns by telephone (907) 465-5210 or e-mail at Bruce_Wanstall@dec.state.ak.us

Sincerely,

Bruce Wanstall

Bruce Wanstall
Environmental Specialist

cc: Brian Olsen, Delta Western, Juneau