

# STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

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

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File: 1504.26.089

May 12, 2003

Mr. Mike McKimmens  
Public Works Director, City of Craig  
PO Box 23  
Craig, AK, 99921

Re: No Further Action Determination  
Craig City Shop, Cold Storage Road, USS 2327, Tract P Lots 1 & 2  
Facility ID 1708, LUST Event ID 1981, Database ID 1991130027001

The Department of Environmental Conservation (ADEC) Juneau Office has recently completed a review of the file associated with the Craig City Shop. Based on our review of the project file and with the information and analytical results provided by your consultant Smith, Bayliss, LeResche Inc. (SBL), ADEC finds that the referenced site pertaining to the former locations of the regulated underground storage tanks (USTs), do not pose a significant threat to human health or safety, or the environment.

### **Site Investigation History**

Site Assessment and cleanup on three USTs for the City of Craig was performed in September 1991 by consultant Randolph Bayliss, P.E. Soil from the excavation sidewalls and tank footprints was field screened for petroleum contamination and closure soil samples with duplicates were collected 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.

Contaminated soil was not found during the Change in Service site assessment of the 4,000-gallon diesel tank. Petroleum was detected in soil when the diesel UST dispenser was decommissioned, however the amount was minor with screening concentrations low, no corrective action was taken. Analytical tests on soil from the dispenser excavation supported the field screening results. The removal-from-service of the Dispenser Island and piping associated with the 500-gallon and 1,800-gallon gasoline USTs discovered elevated petroleum levels in excavation soils. All UST related equipment was removed using a single excavation; 15 cubic yards of soil was field screened, mostly from around the 1,800-gallon UST, and segregated to an on-site, lined stockpile. Pit closure soil analyticals associated with the gasoline USTs showed that removal of all soils with petroleum concentrations above regulatory limits was successful.

The October 1991 follow-up Corrective Action Plan (CAP) proposed an on-site biocell to be located at the southern end of the property about 250 feet from mean low water of Crab Bay. The approved CAP to fertilize, till, and aerate the soils was performed through the fall months of 1991. Post-treatment sampling in December showed that petroleum levels had been reduced below regulatory concentrations and the soil was spread onto a non-sensitive area of the property.

### **Subsurface Water**

Groundwater was not encountered in either of the UST excavations that were taken to approximately 9-feet below-ground-surface. It is the opinion of the Department that possible impacts to groundwater from the low petroleum concentrations characterized in soil at the site have naturally attenuated below regulatory 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 Crab Bay 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.

#### *Groundwater*

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

#### *Soil*

ADEC has determined that the migration to groundwater cleanup levels for soil, found in 18 AAC 75.341, Tables B1 and B2, are applicable to this site and are as follows for the over 40-inch precipitation zone.

<u>Compound</u>	<u>Cleanup Level</u>
GRO	260 mg/kg
DRO	230 mg/kg
RRO	8300 mg/kg
Benzene	0.02 mg/kg
Toluene	4.8 mg/kg
Ethylbenzene	5.0 mg/kg
Xylenes	69.0 mg/kg

### **Ecological Receptors**

Ecological receptors are not present at the site. No potential migration pathways are present to transport contaminants to off-site ecological receptors.

**Cumulative Human Health Risk**

For detectable contamination that remains on-site following a cleanup, a cumulative risk determination will be calculated under 18 AAC 75.325(g). A chemical detected at one-tenth or more Table B1 inhalation or ingestion values 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).

**Determination**

The investigation and cleanup associated with the Craig City Shop regulated gasoline USTs 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 consultant, 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 by e-mail at [Bruce.Wanstall@dec.state.ak.us](mailto:Bruce.Wanstall@dec.state.ak.us)

Sincerely,



Bruce Wanstall  
Environmental Specialist