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: 1513.38.001

May 8, 2003

Natalie Cheeseman
Cameron Heating and Plumbing, Inc.
1850 Crest Street
Juneau, AK, 99801

Re: Site Assessment/ Release Investigation/ Corrective Action Plan
Randolph Bayliss, P.E. January 1994 (Bayliss 1994)
Cameron Plumbing and Heating
Contaminated Sites Database ID 1993110133401

Dear Linda:

The Department of Environmental Conservation (ADEC) Juneau Office has recently completed a review of the file associated with the Cameron Plumbing and Heating Facility. Based on our review of the project files and the information and analytical results provided in the referenced Report by your consultant, ADEC finds that the referenced site pertaining to the former location of the underground heating oil storage tank does not pose a significant threat to human health or safety, or the environment.

Site Background/ History

A 1,000-gallon gasoline underground storage tank (UST) was decommissioned from the property in July 1993. Petroleum contamination was detected in the excavation soils and a Site Assessment performed as required for USTs regulated under 18 AAC 78. The Site Assessment determined that the source of the contamination was attributable to the containment failure of the adjacent 1000 gallon heating oil UST still in use and positioned 30 feet to the west of the gasoline UST. In late November 1993 the heating oil UST was decommissioned and a Site Assessment performed according to Contaminated Site regulations under 18 AAC 75. Petroleum contamination was discovered in the soil overlying the tank near the fill pipe and the UST had visible holes, supporting the conclusions put forth in the Site Assessment of the regulated tank removal.

The Department provided a letter to Cameron Plumbing and Heating in March 1998 confirming that contamination cleanup was complete with respect to the UST regulated under 18 AAC 78 and managed by the Storage Tank Program. In addition the letter stated that before the Department can close out the portion of remaining contaminated soil associated with the unregulated UST, sampling would need to be performed that showed that the soil met applicable Department cleanup levels. The letter also explained that the heating oil UST Site Assessment and cleanup is managed in a very similar manner by the Contaminated Sites Program under 18 AAC 75.

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Site Characterization
Site Characterization was performed by consultant Randolph Bayliss, P.E. when the heating oil UST and related structures were decommissioned. Excavated and in-place soils were field screened for petroleum contamination and when appropriate soil was segregated to a lined, on-site stockpile. Pit closure soil samples with duplicates were collected in accordance with the Storage Tank Procedures Manual and requirements under 18AAC 75.325. - 75.335. Laboratory analysis of the soil samples included diesel range hydrocarbons (DRO) and benzene, toluene, ethylbenzene, and xylene (BTEX) compounds. Field screening resulted in a 20 cubic yard soil stockpile. Stockpiled soil analytical samples had DRO concentrations of 21,000ppm and 10,000ppm, while five of the six pit closure samples ranged from 28ppm to 110ppm DRO. Two of these pit closure samples were analyzed for the BTEX compounds and had concentrations below the method detection limit. One of the pit closure samples collected from the west wall of the excavation contained 2,800ppm DRO. Pursuit of complete removal of contaminated soil along the west wall of the pit was stopped in order to protect the foundation of the main facility structure.

Remaining On-Site Soil Contamination
Concentrations of 2,800ppm DRO were detected in the Site Assessment pit closure soil samples from the west wall of the excavation. The soil contamination extending beneath the main building from the former location of the heating oil UST was estimated at 30 cubic yards. Corrective action prior to closing the pit included the addition of fertilizer to promote in-situ bioremediation of the residual contamination. Fifty pounds of ordinary garden fertilizer was added to backfill soils and a 20-foot length of 4-inch perforated PVC pipe with a vertical chimney was installed along the west wall to provide aeration.

Contaminated Soil
The 20-cubic-yard soil stockpile contaminated with heating oil was transported to the Bicknell Asphalt Facility and thermally remediated.

Cleanup Levels
Groundwater
If encountered, Table C values listed under18 AAC 75.345 are applicable for groundwater.

Soil
DEC 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.

Compound	*Cleanup Level*
GRO	260 mg/kg
DRO	230 mg/kg
Benzene	0.02 mg/kg
Toluene	4.8 mg/kg
Ethylbenzene	5.0 mg/kg
Xylenes	69.0 mg/kg

Groundwater Use Determination
Groundwater at a site is considered to be a potential drinking water source unless a responsible person demonstrates or the department determines otherwise. In accordance with 18 AAC 75.350, ADEC has determined that the water potentially underlying the site:

- Is not currently used for a private or public drinking water source, is not within the zone of contribution of an active private or public drinking water system, and is not within a recharge area for a private or public drinking water well, a wellhead protection area, or a sole source aquifer;

- Is not a reasonably expected future source of drinking water considering that water is readily available from the City and Borough of Juneau Public Water System and abundant, high quality surface water is available through the use of rooftop collection and cistern storage.

- Will not be transported to any groundwater source that is a current or reasonably expected potential future source of drinking water.

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 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).

Determination
The investigation and cleanup of petroleum contamination has thus far 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 regarding the accessibility of the remaining contaminated material, groundwater use at the site and in the area, and human health and ecological risks, ADEC has determined that an issuance of **No Further Remedial Action Planned** (NFRAP) is appropriate for this site. This determination is subject to the following Institutional Controls.

Institutional Controls
The following Institutional Controls are established for this property until such time that contaminant concentrations in soil and groundwater are shown to meet the most stringent cleanup criteria. These Institutional Controls were verbally reviewed with the current property owner representative Natalie Cheeseman on May 8, 2003.

I. A database record will be entered into the ADEC's Underground Storage Tanks and Contaminated Sites Database that will include information pertaining to the location and estimated quantity of contaminated soil that remains onsite.

II. Additional contaminated material shall be investigated and appropriately managed or removed in accordance with ADEC cleanup requirements at such time if and when it becomes accessible through major structural modifications or demolition of current structures on the property.

III. Groundwater supply wells will not be installed on this property.

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