



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of
Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File: 2100.38.548

May 28, 2014

Aircraft Service International Group
Attn: Amber Deem
P.O. Box 190246
Anchorage, Alaska 99519

Re: Decision Document; AFSC Concourse A Fuel Pipeline;
Cleanup Complete Determination

Dear Ms. Deem;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Anchorage Fueling Service Company (AFSC) Concourse A Fuel Pipeline (Concourse A); located south of Concourse A at the Ted Stevens Anchorage International Airport in Anchorage, Alaska. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action will be required.

This decision is based on the administrative record for AFSC Concourse A Fuel Pipeline, which is located in the offices of the ADEC 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 the Cleanup Complete determination.

Introduction:

Site Name and Location:

AFSC Concourse A Fuel Pipeline
Ted Stevens Anchorage International Airport
W. International Airport Road
Section 34, Township 13 north, Range 4 West,
Seward Meridian

Name and Mailing Address of Contact Party:

Amber Deem
Aircraft Service International Group
P.O. Box 190246
Anchorage, Alaska 99519

ADEC Site Identifiers

File: 2100.38.548
Hazard ID: 26232

Regulatory authority under which the site is
being cleaned up:

18 AAC 75

Background

Contaminated soil was encountered during apron reconstruction and pipeline removal in the vicinity of Concourse A. Soil was excavated and sampled for disposal. Confirmation samples were collected and the site was backfilled with clean fill and paved over.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for diesel range organics (DRO) and glycol. Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified in soil:

- Diesel Range Organics (DRO)

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2, Migration to Groundwater Pathway for the Under 40 inch Zone. Groundwater was not considered a complete pathway and therefore not carried through the closure assessment.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
• DRO	250

Site Characterization and Cleanup Activities

Approximately 3,335 cubic yards of contaminated soil was removed from fueling pits and pipeline excavations and transported to the airport landspread area for treatment. Analytical samples were collected from excavated soil for disposal characterization and from excavation bottoms for confirmation sampling. Samples were analyzed for DRO and glycol. Contaminants were not detected above the most stringent Migration to Groundwater cleanup levels. The piping and pit enclosures, and valve pit hardware were removed from the trenches and the site was backfilled with clean material and paved over.

Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), 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 non-carcinogenic 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.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was 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.

Contaminated soil was excavated and disposed offsite during apron reconstruction activity. Although contaminated soil remains in place above cleanup levels, ADEC has determined that it does not pose unacceptable risk to human health or the environment. Exposure to the remaining contamination is detailed in Table 1 below.

Table 1 – Spill Site Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	No contaminants of concern in the surface soil.
Sub-Surface Soil Contact	De Minimis	Remaining contamination is below migration to groundwater cleanup levels and covered by clean fill and a concrete cap.
Inhalation – Outdoor Air	De Minimis	DRO remains in the soil below outdoor inhalation levels and is considered de minimis.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	No volatile compounds are present that pose a risk for vapor intrusion.
Groundwater Ingestion	Pathway Incomplete	Contaminants are below Migration to Groundwater cleanup levels and groundwater is not used as a drinking water source in this area.
Surface Water Ingestion	Pathway Incomplete	Groundwater that is hydrogeologically connected to surface water was not encountered and remaining contamination is below Migration to Groundwater cleanup levels.
Wild Foods Ingestion	Pathway Incomplete	No bioaccumulative contaminants are present that are accessible by plants or burrowing animals.
Exposure to Ecological Receptors	Pathway Incomplete	No bioaccumulative contaminants are present that are accessible by plants or burrowing animals.

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

Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as closed 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). 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.

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 ADEC Project Manager Meghan Dooley at (907) 269-3056.

Approved By,



Meghan Dooley
Environmental Program Specialist