THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File: 2612.38.006

June 10, 2014

Jennifer Micolichek
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
MS-2525
Anchorage, Alaska 99519

Re: Decision Document; ADOT&PF McGrath Airport;
Cleanup Complete Determination

Dear Ms. Micolichek;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the ADOT&PF McGrath Airport Runway site (Runway); located next to the runway at the airport in McGrath, 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 ADOT&PF McGrath Airport Runway, 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:
ADOT&PF McGrath Airport Runway
McGrath, Alaska 99627

ADEC Site Identifiers
File: 2612.38.006
Hazard ID: 1032

Name and Mailing Address of Contact Party:
Jennifer Micolichek
Alaska Department of Transportation and Public Facilities
P.O. Box 196900
MS-2525
Anchorage, Alaska 99519

Regulatory authority under which the site will be cleaned up:
18 AAC 75

Background
The Runway site is located on an apron at Runway 7-25 adjacent to McGuires Avenue near the Kuskokwim River. Anecdotal reports state that contamination was a result of releases over time from refueling and offloading fuel from airplanes at a dispenser located on the runway apron. Shallow petroleum contamination was encountered during reconstruction of the runway in 2006. Groundwater was not encountered during site activities and was not evaluated due to the shallow nature of the contamination.

Contaminants of Concern
During the investigations at this site, soil samples were analyzed for diesel range organics (DRO), gasoline range organics (GRO) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). 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.

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

Site Characterization and Cleanup Activities
Through an interview with the airport manager it was learned that refueling and fuel offloading activities have been occurring at this location since the 1950's. Although no official spill reports were made, contaminated soil was encountered during reconstruction activities at the runway apron in 2006. Asphalt and visibly contaminated material was removed down to native soils. Excavated material was sampled and properly disposed of offsite. Confirmation samples were collected and analyzed for DRO, GRO, and BTEX. The 2007 Final Analytical Data Report showed concentrations of DRO remain in the soil up to 436 mg/kg at 18" below ground surface.

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	De Minimis Exposure	Remaining contamination is below inhalation and ingestion levels and covered by an asphalt cap.
Sub-Surface Soil Contact	De Minimis Exposure	Remaining contamination is below inhalation and ingestion levels and covered by an asphalt cap.
Inhalation – Outdoor Air	De Minimis Exposure	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	Groundwater was not encountered in the excavation and likely is not to be impacted.
Surface Water Ingestion	Pathway Incomplete	Groundwater that is hydrogeologically connected to surface water was not encountered so this pathway is considered incomplete.
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) 269-3057.

Approved By,

Meghan Dooley
Environmental Program Specialist