



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No: 2100.38.540

December 3, 2014

Alaska Native Tribal Health Consortium
Attn: Mr. Chris Vaught
4000 Ambassador Drive
Anchorage, Alaska 99508

**Subject: Decision Document: ANTHC Tract I, Block 5, Tudor Center
Cleanup Complete Determination**

Dear Mr. Vaught;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the site known as Alaska Native Tribal Health Consortium (ANTHC) Tract I, Block 5, Tudor Center (Tract I) located at 4000 Ambassador Drive 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 this site will be closed.

This decision is based on the administrative record for Tract I 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.

Site Name and Location:

Alaska Native Tribal Health Consortium
Tract I, Block 5, Tudor Center
4000 Ambassador Drive
Anchorage, Alaska 99508

Name and Mailing Address of Contact Party:

Alaska Native Tribal Health Consortium
Mr. Chris Vaught
4000 Ambassador Drive
Anchorage, Alaska 99508

DEC Site Identifiers:

File No: 2100.38.540
Hazard ID: 26040

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

In 2010, a former dump site was discovered on Tract I during an excavation for the construction of a parking lot. The dump site contained petroleum contaminated material, asphalt emulsion, wood and metal debris, and asphalt blocks that is suspected to have come from an asphalt plant that was formerly located east of Tract I on Tract C-2, a closed contaminated site (ADEC File No. 2100.38.201). A soil sample collected from the dump area contained diesel range organics (DRO), arsenic, and chromium in excess of the most stringent Method 2 cleanup levels.

To the west of Tract I is the ANTHC Healthy Communities Building on another known contaminated site, ANTHC Tract J Block 5 (ADEC File #2100.38.516). Tract I was originally managed as part of the Tract J contaminated site, but was assigned its own hazard identification when it was determined that Tract I and Tract J wastes were not commingled.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for DRO, gasoline range organics (GRO), residual range organics (RRO), polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAH), Resource Conservation and Recovery Act (RCRA) metals, and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following contaminants of concern was identified in soil:

- DRO
- Trichloroethylene (TCE)

Arsenic and chromium were also detected above cleanup levels, but, based on the concentrations and knowledge of the contaminant source area, the arsenic and chromium detections are considered representative of background conditions and not associated with contamination at the site.

Cleanup Levels

The applicable cleanup levels at this site are established in 18 AAC 75.341, Method Two, Table C groundwater cleanup levels and Tables B1 and B2 soil cleanup levels for Migration to Groundwater Pathway in the Under 40 inch Zone.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)	Groundwater (mg/L)
DRO	250	1.5
TCE	0.02	0.005

mg/kg = milligrams per kilogram

Site Characterization and Cleanup Activities

In 2011, 1,180 cubic yards (cy) of contaminated soil were excavated and sent to Alaska Soil Recycling for thermal treatment. Confirmation samples collected from the base of the excavation contained DRO up to 632 mg/kg and TCE up to 0.169 mg/kg. Another 10 cy was excavated from the location where DRO exceeded the cleanup level and further confirmation samples indicated that DRO concentrations were

below the most stringent Method 2 cleanup levels. The 1,190 cy stockpile was taken to Alaska Soil Recycling for treatment and the excavation was backfilled with clean fill.

In 2013 a soil boring was advanced and completed as a groundwater monitoring well down-gradient of the location where TCE was detected above the cleanup level. Soil and groundwater samples were collected to determine if groundwater had been impacted. Contaminants were not detected in soil or groundwater and the monitoring well was decommissioned in October, 2014.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), 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 noncarcinogenic 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.

Exposure 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 either De-Minimis Exposure or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contaminants are not present in surface soil at the site
Sub-Surface Soil Contact	De-Minimis Exposure	The remaining contamination is approximately 8 feet below ground surface and is below direct contact cleanup levels
Inhalation – Outdoor Air	De- Minimis Exposure	Contaminants remain in the sub-surface, but below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings located within 100’ of the contaminated site and groundwater is not impacted.
Groundwater Ingestion	Pathway Incomplete	Although groundwater may potentially be used as a drinking water source at this site, contaminants were not detected in groundwater.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.

Notes to Table 2: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be affected by the minimal volume or concentration of remaining contamination. “Pathway Incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors.

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, subject to the following Standard Conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325. A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This determination is in accordance with 18 AAC 75.380 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 me at (907) 269-7551.

Sincerely,



Lisa Krebs-Barsis
Environmental Program Specialist

Electronic cc: Ms. Kristi McLean, R&M Consultants, Inc.