



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: 2100.26.170

May 21, 2015

Rust's Flying Service- Lake Hood
Attn: Todd Rust
P.O. Box 190325
Anchorage, Alaska 99519

**Subject: Decision Document: Rust's Flying Service- Lake Hood
Corrective Action Complete Determination**

Dear Mr. Rust:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with Rust's Flying Service-Lake Hood 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 this site will be closed.

This decision is based on the administrative record for Rust's Flying Service- Lake Hood site 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 Corrective Action Complete determination.

Site Name and Location:

Rust's Flying Service- Lake Hood
4525 Enstrom Circle
Anchorage, Alaska 99502

Name and Mailing Address of Contact Party:

Todd Rust
P.O. Box 190325
Anchorage, Alaska 99502

DEC Site Identifiers:

File No: 2100.26.170
Hazard ID: 23706
RecKey No: 1996210012006

Regulatory Authority for Determination:

18 AAC 75 and 18 AAC 78

Site Description and Background

In 1996, Rust's Flying Service (UST facility ID 1368) hired a consultant to close three USTs: one 500-gallon automobile gasoline UST and two 2,000-gallon aviation gasoline USTs. The project also included the evaluation and closure of the piping runs for the three USTs and a dispenser associated with the 500-gallon

UST. The 500-gallon UST was installed in 1971 and the two 2,000-gallon USTs were installed in 1980 and 1981 south of the building 85-feet from the shore of Lake Hood. Piping runs extended to the former pump house and a dock on Lake Hood. During the removal investigation, petroleum contaminated soil was discovered in the tank excavation and in piping trenches.

Contaminants of Concern

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

Based on the applicable cleanup levels at the time of site discovery and results of the investigation, the following Contaminants of Concern were identified in the soil and groundwater:

- GRO,
- Benzene

Cleanup Levels

The applicable soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Under 40 Inch Zone, for Outdoor Inhalation and Inhalation and Ingestion.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
GRO	1,400
Benzene	11

In 2001, the ADEC approved a groundwater use determination, in accordance with 18 AAC 75.350, in which the Anchorage International Airport (AIA) demonstrated that the shallow unconfined aquifer around the airport is not used as a source for public or private drinking water wells.

The groundwater use determination in 2001 established three “risk management zones” (RMZs) designated by AIA. The three AIA RMZs are the Air Side RMZ, Commercial RMZ, and Ecological RMZ. The Rust’s Flying Service site is within the Ecological RMZ. In 2007, the 2001 determination was amended to include the Ecological RMZ. Groundwater is not used for drinking water in accordance with the 2001 determination and 2007 amendment, therefore the migration to groundwater soil cleanup levels and groundwater cleanup levels are not applicable for this site.

Characterization and Cleanup Activities

The three tanks, piping, and dispenser were removed in 1996. Characterization samples collected from the tank and piping excavations had up to 430 mg/Kg of GRO and up to 6.7 mg/Kg of benzene. Approximately 30 cubic yards of soil were removed and disposed at Alaska Soil Recycling (ASR). One sample collected from the stockpile was also analyzed for lead. The lead concentration was 19.4 mg/Kg, below the cleanup level of 800 mg/kg. Groundwater was found at six feet below ground surface but was not sampled as part of the initial investigation.

In 1999 another investigation was conducted that included the investigation of contamination in the footprint of the previous UST excavation and the excavation and treatment of contaminated soil from the piping runs. Benzene was detected in soil at the former UST excavation at 0.1 mg/Kg. . Approximately 154 tons of soil from the piping run excavation was disposed of at ASR. Confirmation samples collected from the piping run excavation did not contain

contaminants above cleanup levels. A 1,500 gallon UST on the north east side of the lot, near Lake Hood, was also removed as part of this site investigation. Confirmation samples collected at this UST excavation did not contain contaminants above cleanup levels.

In 2008, groundwater and pore water was looked at as part of an investigation at a co-located site (ADEC file number 2100.38.480) associated with a spill of Jet-A fuel from an above ground storage tank (AST) on the property. Three groundwater monitoring wells were installed and two passive diffusion bags were deployed along the Lake Hood shoreline. No contaminants of concern were detected above cleanup levels. The three monitoring wells were decommissioned in 2015.

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.

Cumulative risk was calculated assuming a residential land use and using the highest detected concentrations of contaminants from all of the soil confirmation samples collected during the two investigations in 1996 and 1999. The cumulative risk calculation indicates a cumulative carcinogenic cancer risk of 0.7 in 100,000 and a non-carcinogenic hazard index of 0.08 suggesting cumulative risk is not a concern at this site.

Exposure Pathway Evaluation

Following a review of the environmental records for 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 or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Direct Contact with Surface Soil	De Minimis Exposure	Remaining contamination in surface soil is below direct contact cleanup levels and is covered by pavement.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	The remaining contaminated sub-surface soil is covered by pavement and do not exceed direct contact or ingestion cleanup levels.
Inhalation-Outdoor Air	De Minimis Exposure	The remaining contaminant concentrations are below inhalation cleanup levels and the area is covered by pavement
Inhalation-Indoor Air	De-Minimis Exposure.	Contaminants were not detected above vapor intrusion action levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater was determined to not be a current or future potential drinking water source through 18 AAC 75.350.
Surface Water Ingestion	Pathway Incomplete	Surface water in the area is not used for drinking water purposes.
Wild Foods Ingestion	Pathway Incomplete	The site is in a paved industrial area and no wild foods are collected.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at the site

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.

ADEC Decision

Based on the information available, ADEC has determined no further assessment or corrective action is required. There is no longer a risk to human health or the environment, and this site will be designated as Corrective Action Complete on the Department’s database, subject to the following Standard Conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off of this site requires ADEC approval in accordance with 18 AAC 78.600. 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.
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 78.276(f) 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 feel free to contact me at (907) 269-7551.

Sincerely,



Lisa Krebs-Barsis
Environmental Program Specialist

Electronic cc: Scott Lytle, Ted Stevens Anchorage International Airport