THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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Main: 907.451.2153
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File No: 100.38.260

September 30, 2015

Dan Britton
Fairbanks Natural Gas
3408 Industrial Way
Fairbanks, Alaska 99701

Re: Decision Document: Fairbanks Natural Gas Tanana Levee Industrial Park
Cleanup Complete Determination

Dear Mr. Britton:

The Alaska Department of Environmental Conservation (DEC) has reviewed the environmental records for the referenced site. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

Site Name and Location:
Fairbanks Natural Gas Tanana Levee
Industrial Park
2942 Tria Road
Fairbanks, Alaska 99709

Name and Mailing Address of Contact Party:
Dan Britton
Fairbanks Natural Gas LLC
3408 Industrial Way
Fairbanks, Alaska 99701

DEC Site Identifiers:
File No: 100.38.260
Hazard ID: 26420

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background

In April 2015 petroleum-stained surface soil was discovered at the Fairbanks Natural Gas facility on Tracts C and D of the Tanana Levee Industrial Park subdivision. Phase I and limited Phase II environmental site assessments were conducted in May and June, 2015 respectively. Diesel range organics, residual range organics, and arsenic were confirmed present in surface soil above DEC cleanup levels at two locations

Contaminants of Concern

The following petroleum contaminants of concern were identified at concentrations above cleanup levels during the course of the site investigations summarized in the Characterization and Cleanup Activities section of this decision letter.

- Diesel Range Organics (DRO)
- Residual Range Organics (RRO)
- Arsenic

Cleanup Levels

The migration to groundwater cleanup levels for soil, established in 18 AAC 75.341 (d), Table B1 and Table B2, apply to this site.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
DRO	250
RRO	11,000
Arsenic	3.9

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities

A limited removal action was planned and completed for the east area vehicle track and the primary vehicle track in August 2015. The east area vehicle track excavation measured 8 by 10 feet (ft), with a maximum depth of 1.8 ft below ground surface (bgs). The primary vehicle track excavation measured 3.5 by 8 ft with a maximum depth of 1 ft bgs. Approximately 8 cubic yards of contaminated soil was removed from these locations and disposed of at OIT, Inc., in North Pole, Alaska.

Four analytical samples including one duplicate were collected from the east area vehicle track excavation. Two analytical samples were collected from the primary vehicle track excavation. The soil was analyzed for: benzene, ethylbenzene, toluene, and total xylenes (BTEX), DRO, RRO, and polynuclear aromatic hydrocarbons (PAHs). No analytical results exceeded ADEC soil cleanup levels.

Arsenic was detected above the cleanup level at 4.6 mg/kg however this concentration is consistent with background arsenic concentrations in soil for this area and is not related to contamination at the site.

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 one of the following: De-Minimis Exposure, Exposure Controlled, 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	De-Minimis Exposure	Contamination does not exceed cleanup levels in surface soils (0 to 2 ft bgs).
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination does not exceed cleanup levels in surface soils (below 2 ft bgs).
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in soil, but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Volatile compounds do not remain at the site.
Groundwater Ingestion	Pathway Incomplete	Groundwater contamination is not present.
Surface Water Ingestion	Pathway Incomplete	Surface water has not been affected.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Contamination is no longer present in surface soil and exposure routes for ecological receptors are not present.

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. "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

Remaining petroleum contamination in soil is below approved cleanup levels. This site will receive a "Closed" designation on the Contaminated Sites 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 DEC 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 99811-1800, 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 99811-1800, 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) 451-2153.

Sincerely,

FOR Robert Burgess
Project Manager

cc: LeeAnne Osgood, Shannon & Wilson, Inc., Anchorage