

# STATE OF ALASKA

**SARAH PALIN, GOVERNOR**

## DEPT. OF ENVIRONMENTAL CONSERVATION

### DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2319.38.001

April 5, 2007

Tom Barrett  
Environmental Compliance Manager  
Kenai Peninsula Borough  
144 N. Binkley Street  
Soldotna, Alaska 99669-7520

Re: Tustumena Elementary School, ADEC Spill # 1991230134301  
Kasilof, Alaska  
Environmental Record of Decision

Dear Mr. Barrett.:

The Alaska Department of Environmental Conservation, Contaminated Sites Program, (ADEC) reviewed the administrative records for the heating fuel release, assessment, and cleanup actions at the Tustumena Elementary School. Based on the information presented to date, ADEC has determined that hazardous substance contamination remains under the school maintenance building but, subject to conditions established in this decision document, it does not pose an unacceptable risk to human health or the environment.

In accordance with this determination, ADEC requires no further remedial action at this site and a conditional closure status is approved. This letter summarizes the information considered in making this decision regarding the environmental status of this site.

Site name and location:

Tustumena Elementary School  
Kasilof, Alaska

Regulatory authority under which the site is being cleaned up:

18 AAC 75, Article 3

Name and mailing address of current contact and/or responsible person:

Tom Barrett, Environmental Compliance Manager  
Kenai Peninsula Borough  
144 N. Binkley Street  
Soldotna, Alaska 99669-7520

### **Background**

On 9 December 1991, a heating fuel spill of approximately 1500 gallons was reported at the Tustumena Elementary School from a corroded pipe in an old boiler room. It migrated to the ground underneath the cement floor. The initial response actions included the removal of the heating oil tank and the piping.

The Borough conducted a site assessment with vertical and angle borings along the perimeter of the building and in the mechanical room where the release occurred. All drinking water wells within 1,000 feet of the site were sampled and were non-detect with the exception of a toluene detection (below the MCL) in one newly drilled well. The buildings were ventilated and/or monitored until January 1992.

Five monitoring wells and a soil vapor extraction/oxygen enhancement system were installed to address the contamination that remained under the school building. The monitoring wells were periodically sampled until the contaminant levels were consistently below the cleanup levels. The soil vapor extraction system was operated until further reduction of contaminant levels stabilized. Both the monitor wells and the SVE system have been removed.

There may be soil contamination under the building that exceeds ADEC cleanup levels. However, it is currently inaccessible and not considered a risk to human health or the environment. Furthermore, the Borough is required to contact ADEC if the contaminated area becomes accessible in order to determine the appropriate corrective actions at that time.

### **Contaminants of Concern**

The contaminants of concern for both soil and groundwater are associated diesel fuel and include:

- Benzene, toluene, ethylbenzene and xylenes (BTEX)
- Diesel range organics (DRO)
- Residual range organics (RRO)

### **Pathway Evaluation**

The human exposure pathways evaluated include: inhalation, ingestion of soil and water and dermal contact. The migration pathways considered include: migration to groundwater and/or surface water. The impacts to ecological receptors were also evaluated.

The exposure pathways to humans are currently limited because the contaminated soil is beneath a building and inaccessible. Response actions have reduced the contaminant levels so that they do not pose a hazard to human health or the environment. As long as the building remains in place and the soil is not accessible to humans, there is no unacceptable risk to human health and the environment. The groundwater has been proven to not have any petroleum contamination related to this release exceeding applicable ADEC cleanup levels. Therefore there is no completed exposure pathway.

### **Cleanup Levels**

The soil cleanup levels established for this site are the 18 AAC 75.341 (Tables B1 and B2) levels for Migration to Groundwater (under 40 inch zone). The groundwater cleanup levels for this site are the 18 AAC 75.345 Table C levels.

### **ADEC Decision**

ADEC has determined that the cleanup actions to date have resulted in the removal and/or treatment of the contaminated soil to the extent practicable. The contaminated soil remaining on site is not

accessible to human receptors based on its location and/or land use controls. There was no indication of impacts to ground or surface water from this incident.

Based on the information to date, ADEC recognizes that residual soil contamination remains on site but, with appropriate controls and conditions, it does not pose an unacceptable risk to human health or the environment. No further remedial action is required at this time and the site is approved for conditional closure, subject to the following conditions:

1. When (or if) the buildings are removed and/or the contaminated soil becomes accessible, ADEC shall be contacted for appropriate action. ADEC must approve any excavation, transport, remediation and/or disposal of soil from the school site in accordance with 18 AAC 75.325(i).
2. A Notice of Environmental Contamination will be established on the ADEC database to document the residual soil contamination remaining on site above the most stringent 18 AAC 75.341 soil cleanup levels.

Site closure (without conditions) will be considered when soil samples confirm that the soil meets the established ADEC soil cleanup levels for this site.

In accordance with 18 AAC 75.380(d)(2), ADEC may require additional site assessment, monitoring, remediation, and/or other necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

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 or concerns about this Conditional Closure decision, or any of the attached conditions, please contact me at (907) 262-5210, extension #233.

Sincerely,



Don Seagren  
Environmental Program Specialist  
Department of Environmental Conservation

