

THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Environmental  
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

555 Cordova St  
Anchorage, AK 99501  
Main: 907-269-7503  
Fax: 907-269-7687  
www.dec.alaska.gov

File No: 2100.38.516

February 1, 2016

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

Subject: Decision Document: ANTHC Tract J, Block 5, Tudor Centre  
Hazard ID. 25531, Cleanup Complete Determination- Institutional Controls

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 J, Block 5, Tudor Center (Tract J) 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 no further remedial action will be required as long as the site is in compliance with established institutional controls (IC).

This decision is based on the administrative record for Tract J 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 with Institutional Controls.

**Site Name and Location:**

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

**Name and Mailing Address of Contact Party:**

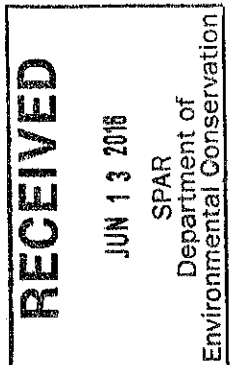
Alaska Native Tribal Health Consortium  
Mr. Chris Vaught  
4000 Ambassador Drive  
Anchorage, Alaska 99508

**DEC Site Identifiers:**

File No: 2100.38.516  
Hazard ID: 25531

**Regulatory Authority for Determination:**

18 AAC 75



**Site Description and Background**

In 2003, a Phase II Environmental Site Assessment (ESA) was performed on behalf of ANTHC in anticipation of construction of new ANTHC facilities on the site. The Phase II ESA included ten test pits and four soil borings. Soil

and groundwater sample results indicated that the site was contaminated with diesel range organics (DRO) from an unknown source.

East of Tract J is another closed contaminated site, ANTHC Tract I Block 5 (ADEC File #2100.38.540). 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 contamination sources 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), volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Groundwater samples were analyzed for GRO, DRO, RRO, and BTEX. Based on these analyses and knowledge of the source area, the following contaminants of concern were identified in soil and groundwater:

- DRO
- RRO

### Cleanup Levels

The applicable soil cleanup levels at this site are established in 18 AAC 75.341, Method Two, for the migration to groundwater pathway. The applicable groundwater cleanup levels are established in 18 AAC 75.345, Table C

**Table 1 – Approved Cleanup Levels**

Contaminant	Soil (mg/kg)	Groundwater (mg/L)
DRO	250	1.5
RRO	11,000	1.1

mg/kg = milligrams per kilogram

mg/L- milligrams per liter

### Site Characterization and Cleanup Activities

In June 2003 the Phase II ESA indicated isolated pockets of DRO soil contamination were present at one of the borings and one of the test pits. The highest level of contamination was detected at Boring B2 with DRO up to 765 mg/kg and RRO up to 533 mg/kg. Groundwater screening samples were collected from each of the borings indicated that groundwater contamination was also present. A month after the June 2003 discovery of DRO contamination at Tract J, three permanent monitoring wells were installed near Boring B2 to monitor groundwater contamination. Soil contamination was discovered in boring B5, near the adjacent man-made lake east of Boring B2. Groundwater samples from each of the three wells had DRO concentrations up to 3.49 mg/L. A level loop survey of the wells was done and flow direction was determined to be toward the northeast and groundwater was between 6.5 and 13.5 feet below ground surface (bgs).

Additional site characterization was performed in August 2010. The three 2003 wells could not be found. Six new borings were advanced and completed as monitoring wells (B8MW-B13MW). DRO was detected at 544 mg/kg and RRO was detected at 561 mg/kg in borehole B10. Wells B10MW and B12MW had DRO and RRO concentrations above cleanup levels in groundwater. Both of these wells were near the location of previously discovered soil and groundwater contamination. Soil and groundwater contamination were not detected in the other four borings, placed both downgradient and upgradient of B10MW and B12MW.

In October 2010 four more borings were advanced and completed as monitoring wells on the southwest boundary of the property to determine if contamination was migrating onto the property from an off-site source. DRO and RRO were not detected in the groundwater samples.

A geotechnical study was conducted in 2011 in anticipation of construction of a new building south of the existing building. The footprint of the new building was near the area with sporadic soil and groundwater contamination. During the 2011 construction, approximately 1800 cubic yards of material were removed for the footprint of the new building. Samples collected from the stockpiles did not contain contaminants above cleanup levels.

In 2013 two new wells were installed to replace former wells B5MW and B10MW. Soil samples from B5MW had concentrations of DRO and RRO but did not exceed cleanup levels. No soil samples were collected from B10MW but a strong hydrocarbon odor was present below six feet. Groundwater samples were collected from the two replacement wells and two other existing downgradient wells in September 2013. There were no detections in the downgradient wells or in B5MW and the downgradient wells were decommissioned. DRO above cleanup levels was detected in B10MW in both the September 2013 and June 2014 sampling events. RRO was detected in both wells B10MW and B5MW in the June 2014 sampling event, but was above cleanup levels only in B10MW.

In October 2014 and April 2015 B10MW was sampled again and analyzed for DRO and RRO. Both parameters exceeded cleanup levels in both sampling events. B5MW was sampled in the April sampling event and neither contaminant was detected. Monitoring wells B11MW and B13MW were decommissioned.

Based on this information and the extensive site-wide groundwater monitoring, it appears that the groundwater contamination located at B10MW is isolated and associated with a small pocket of contaminated soil. The concentrations of DRO and RRO at B10MW are stable. Monitoring wells B5MW and B10MW were decommissioned in August 2015. Other wells were reported destroyed by construction in 2012.

#### **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 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.

#### **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	De- Minimis Exposure	The site is mostly paved and occupied by structures. Screening in surface soils did not indicate presence of contaminants.
Sub-Surface Soil Contact	De-Minimis Exposure	A number of borings have been advanced on the site and limited subsurface contamination was detected in isolated pockets.
Inhalation – Outdoor Air	De- Minimis Exposure	Contaminants were not detected above inhalation cleanup levels
Inhalation – Indoor Air (vapor intrusion)	De- Minimis Exposure	Groundwater monitoring has not shown the presence of volatile contaminants above vapor intrusion screening levels.
Groundwater Ingestion	De- Minimis Exposure	One isolated well still contains contaminants above cleanup levels. An NEC will be filed on the site to prevent use of groundwater as drinking water.
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 from the area impacted by contamination at the site
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**

Contamination remains on site above established cleanup levels, however, the ADEC has determined there is no unacceptable risk to human health or the environment, given the current site use, and this site will be granted a Cleanup Complete- ICs determination.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore ANTHC or their designee shall report to ADEC as soon as they become aware of any change in land ownership or use. **The report can be sent to the ADEC project manager or electronically to [DEC.ICUnit@alaska.gov](mailto:DEC.ICUnit@alaska.gov).**
2. In accordance with the Notice of Environmental Contamination (attached) drinking water wells are prohibited on the site, additional groundwater wells for non-drinking water uses may not be installed at the site without prior approval from the ADEC Contaminated Sites Program.
3. ADEC Contaminated Sites Program approval is required for any disturbance of soil at the site in areas having potential or documented contamination. Please coordinate with the ADEC in advance to avoid project delays.
4. 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.
5. 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.

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.

**Please sign and return Attachment A to ADEC within 30 days of receipt of this letter.** 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

Attachment A: Cleanup Complete-ICs Agreement Signature pages  
Attachment B: Site figure  
Enclosure: Draft NIEC

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

**Attachment A: Cleanup Complete- ICs Agreement and Signature Pages\***

Alaska Native Tribal Health Consortium agrees to the terms of this Corrective Action Complete with Institutional Controls determination as stated in this Decision Document dated **February 1, 2016** for the ANTHC Tract J, Block 5 Tudor Center site. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380(d).



Signature of Authorized Representative, Title

Roald Helgesen, CEO

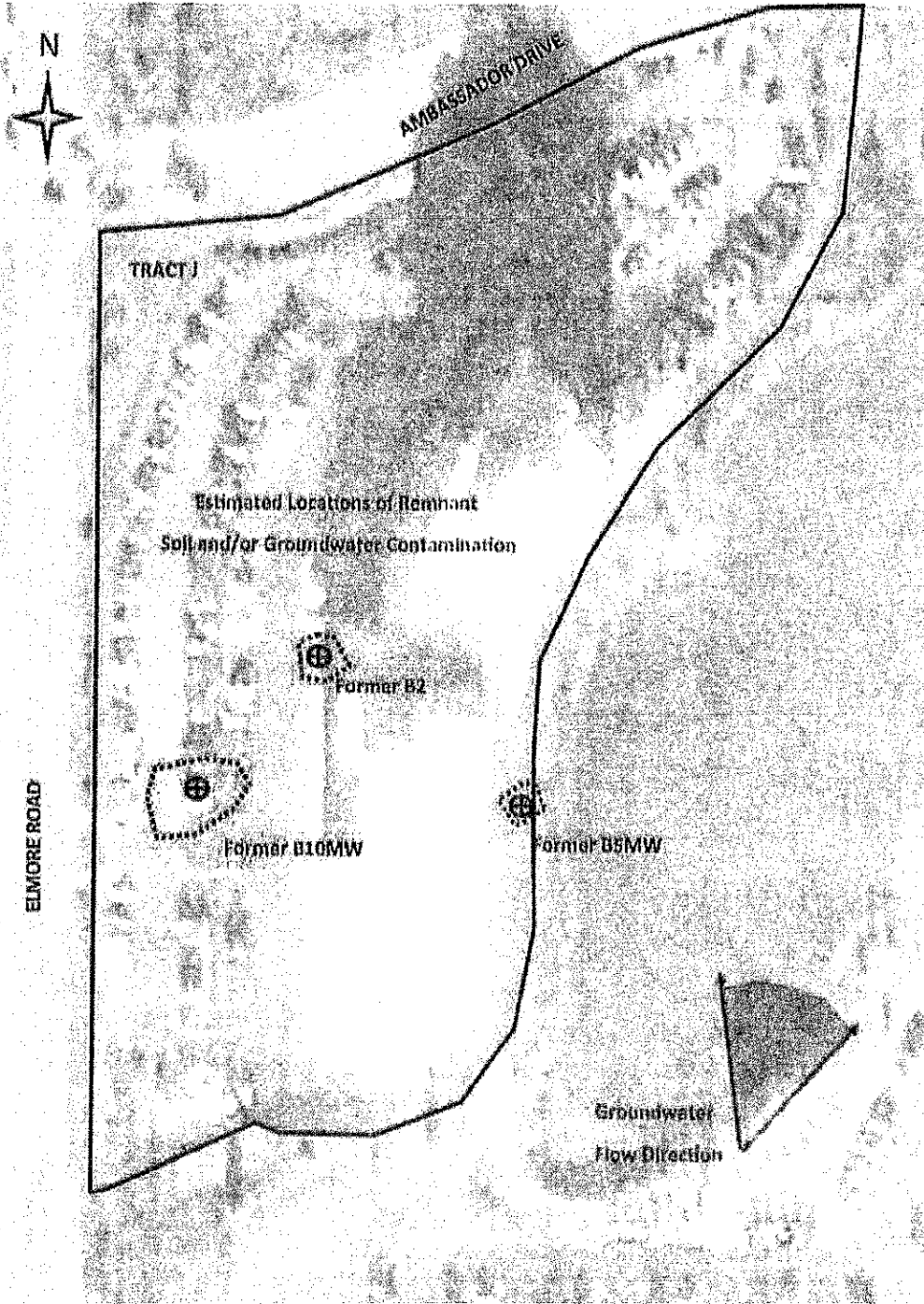
Printed Name of Authorized Representative, Title

**Note to Responsible Party (RP):**

After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

Attachment B: Site Figure

Alaska Native Tribal Health Consortium, Tract J Block 5 Tudor Centre Subdivision  
Contaminated Sites File Number: 2100.38.516 Hazard ID: 25531



# Notice of Environmental Contamination

**Grantor:** State of Alaska  
Department of Environmental Conservation  
Contaminated Sites Program

**Grantee:** Alaska Native Tribal Health Consortium  
Alaska Native Tribal Health Consortium, Tract J Block 5 Tudor Centre

**Legal Description:** Tract J, Block 5 Tudor Centre Subdivision, Plat #95-127

**Recording District:** 301 Anchorage Recording District

**Return to:** Lisa Krebs-Barsis  
ADEC Contaminated Sites Program  
555 Cordova St.  
Anchorage, AK 99501

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

**State Business- No Charge**



## NOTICE OF ENVIRONMENTAL CONTAMINATION

As required by the Alaska Department of Environmental Conservation, Grantor, pursuant to 18 AAC 75.375 Alaska Native Tribal Health Consortium, Grantee, as the owner and operator of the subject property, hereby provides public notice that the property located at: 4000 Ambassador Drive Anchorage, Alaska, 99508, and more particularly described as follows:

Tract J, Block 5 Tudor Centre Subdivision, Plat #95-127, Anchorage Recording District

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 75, Article 3, revised as of April 8, 2012. This release and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at [http://www.dec.state.ak.us/spar/csp/db\\_search.htm](http://www.dec.state.ak.us/spar/csp/db_search.htm) under Hazard ID number 25531.

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment. ADEC determined, in accordance with 18 AAC 75.325 – 390 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though petroleum contaminated soil and groundwater exists on-site. Further cleanup was determined to be impracticable because the contaminated soil and groundwater is found only in an isolated location at the site.

Attached is a site map that shows the property impacted by petroleum contamination. The property is subject to the following Institutional Controls:

1. Drinking water wells are prohibited on the site, as of closure, no new non-drinking water wells will be installed without prior approval of the ADEC Contaminated Sites Program.
2. If any other groundwater monitoring wells are discovered on the property they must be reported and decommissioned in coordination with the ADEC project manager.
3. ADEC Contaminated Sites Program approval is required for any disturbance of soil at the site in areas having potential or documented contamination. Please coordinate with the ADEC in advance to avoid project delays.
4. 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.
5. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This NEC remains in effect until a written determination from ADEC is recorded that states that soil at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and groundwater meets the cleanup levels in Table C in 18 AAC 75.345 and that off-site transportation of soil and groundwater is not a concern.

For more information on the contaminated site in this Notice of Environmental Contamination, please see ADEC Contaminated Sites Program file number 2100.38.516 for the site named ANTHC Tract J Block 5 Tudor Center.

---

Signature of Authorized ADEC Representative

---

Date

Location of Tract J, Block 5 Tudor Centre Subdivision

Alaska Native Tribal Health Consortium, Tract J Block 5 Tudor Centre Subdivision  
Contaminated Sites File Number: 2100.38.516 Hazard ID: 25531

