



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

PO Box 111800
410 Willoughby Ave #303
Juneau, AK 99811-1800
Main: 907-465-5390
Fax: 907-465-5218
www.dec.alaska.gov

June 27, 2016

Andrew Heuscher
Alaska Marine Lines
P. O. Box 24348
Seattle, WA 98124

Re: Closure Decision Document;
Alaska Marine Lines 100 Mt. Roberts Street – UST Tank #4
Corrective Action Complete Determination

Dear Mr. Heuscher:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records associated with the closure of Tank #4, a regulated 1,100 gallon underground storage tank (UST) at the Alaska Marine Lines Facility (ADEC Facility #2600), 100 Mt. Roberts Street, in Juneau, 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 unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Alaska Marine Lines 100 Mt. Roberts Street – UST Tank #4, which is located in the ADEC office in Juneau, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

Alaska Marine Lines - Mt. Roberts St.
100 Mt. Roberts Street
Juneau, Alaska 99801

Name and Mailing Address of Contact Party:

Alaska Marine Lines
Attn.: Andrew Heuscher
P. O. Box 24348
Seattle, WA 98124

ADEC Site Identifiers:

File No: 1513.26.079
Hazard ID: 26523

Regulatory Authority for Determination:

18 AAC 78 and 18 AAC 75

Site Description and Background

On March 22, 2015, Nortech was contracted by Cheeseman Construction to provide environmental oversight during tank closure activities. The 1,100 gallon UST was used for storage of diesel fuel for site equipment and vehicles. It was located below a concrete pad and had a small wooden shed over the pad that housed the fill port and dispenser pump. The DEC UST facility number is 2600. City water and sewer are used at this site. No drinking water wells are known to be in the immediate area.

Contaminants of Concern

Based on the field and laboratory data collected, no Contaminants of Concern (COCs) have been identified.

Cleanup Levels

The approved cleanup levels for soil at the site are the most stringent of 18 Alaska Administrative Code (AAC) 75.341 Method 2 for the over 40 inch precipitation zone.

Characterization and Cleanup Activities

The UST was excavated without incident and the tank and all of the lines appeared in good condition. There were no visible, olfactory, or other indicators that a release had occurred. The tank had been pumped of fuel prior to removal and no residual fuel or sludge was present during closure activities. Soils were field screened using a photoionization detector (PID) during the excavation and field screening results indicated that no soils had been impacted by tank operation activities. No samples were submitted for laboratory analysis.

ADEC regulations regarding UST assessment during a closure by removal require the collection of analytical samples from specified locations. A follow-up release investigation was required per 18 AAC 78.090, due to the fact that no laboratory samples were collected when the tank was removed. On May 22, 2015, Nortech mobilized to the site to collect the necessary samples for tank closure. Soils were field screened using a PID and again, no evidence of contamination was found. A total of three (3) soil samples for laboratory analysis were collected, with a sample collected from below the fill end, below the dispenser, and on the downslope side of where the tank had been located. A duplicate soil sample was also collected and these were analyzed for diesel range organics (DRO), gasoline range organics (GRO), residual range organics (RRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX). The sample results were below their respective 18 AAC 75.341, default Method Two cleanup levels.

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.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations meet the human health cumulative risk criteria for residential land use.

Exposure Pathway Evaluation

Following investigation of 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 1.

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Direct Contact with Surface Soil	Pathway Incomplete	Trace petroleum contamination is below all ADEC cleanup levels.
Direct Contact with Sub-Surface Soil	Pathway Incomplete	Trace petroleum contamination is below all ADEC cleanup levels.
Inhalation-Outdoor Air	Pathway Incomplete	Trace petroleum contamination is below all ADEC cleanup levels.
Inhalation-Indoor Air	Pathway Incomplete	Trace petroleum contamination is below all ADEC cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Trace petroleum contamination is below all ADEC cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Trace petroleum contamination is below all ADEC cleanup levels.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.
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

The actions to date have served to adequately assess the potential for petroleum contaminated soil at the site. Based on the information available, ADEC has determined no further assessment and/or cleanup action is required. This site will receive a “Cleanup Complete” 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 78.600(h). A “site”, as defined by 18 AAC 78.995(134), 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.

June 27, 2016

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 contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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 any questions regarding this letter or concerns please feel free to contact me by telephone at 907-465-5207 or email at Danielle.Duncan@alaska.gov.

Sincerely,



Danielle Duncan
Project Manager

cc: Anne Marie Palmieri, Environmental Program Specialist IV, ADEC, via electronic mail
Jason Ginter, Juneau Technical Manager, Nortech, via electronic mail