



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of  
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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

File: 2265.26.023

August 17, 2016

Chun Jang  
Senior Corporate Counsel  
Arctic Slope Regional Corporation  
3900 C St. Suite 801  
Anchorage, AK 99503

Re: Decision Document: Tundra Tours - Wasilla Bus Barn  
Cleanup Complete Determination

Dear Mr. Jang:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Tundra Tours - Wasilla Bus Barn site, located at 700 North Wasilla-Fishhook Road in Wasilla. 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 Tundra Tours - Wasilla Bus Barn site, which is located in the ADEC office in Anchorage, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

**Site Name and Location:**

Tundra Tours - Wasilla Bus Barn  
700 North Wasilla-Fishhook Road  
Wasilla, Alaska 99687

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

Mr. Jung Chang, Senior Corporate Counsel  
Arctic Slope Regional Corporation  
3900 C St. Suite 801  
Anchorage, AK 99503

**DEC Site Identifiers:**

File No.: 2265.26.023  
Hazard ID.: 23623

**Regulatory Authority for Determination:**

18 AAC 78 and 18 AAC 75

**Site Description and Background**

The Tundra Tours - Wasilla Bus Barn site is located at the southwest corner of the intersection at Danna Avenue and Wasilla-Fishhook Road in Wasilla. The site is generally flat and asphalt-paved. The main building on the property burned down within the last two years. The only remaining structure on the

property is a small coffee kiosk located on the northeast corner of the property. The area surrounding this site is generally industrial and commercial in nature with very little vegetation. Contamination was initially encountered during an underground storage tank closure assessment completed in 1995, which is further described in the Characterization and Cleanup Activities section of this letter.

### Contaminants of Concern

The following contaminants are considered Contaminants of Concern (COCs) at this site:

- Gasoline Range Organics (GRO)
- Diesel Range Organics (DRO)

### Cleanup Levels

The most stringent of the inhalation, direct contact, and migration-to-groundwater (MTG) cleanup levels established in 18 AAC 75.341, Tables B1 and B2 apply to this site.

**Table 1 – Method Two Soil Cleanup Levels for the Under 40-Inch Precipitation Zone**

Contaminant	Soil - Inhalation (mg/kg)	Soil – Direct Contact (mg/kg)	Soil - MTG (mg/kg)	Soil – Maximum Concentration Remaining Onsite (mg/kg)
GRO	1,400	1,400	300	25.6
DRO	12,500	10,250	250	246

**Legend to Table 1:** mg/kg = milligrams per kilogram; MTG = migration-to-groundwater; GRO = gasoline range organics; DRO = diesel range organics

### Characterization and Cleanup Activities

On October 25, 1995, AGRA Earth and Environment Inc. (AEE) removed one 3,000-gallon diesel underground storage tank (UST) and one 2,000-gallon leaded gasoline UST. During removal activities, contaminated soil was excavated and stockpiled onsite. Confirmation soil samples results revealed that soil beneath the USTs and fill piping were contaminated with DRO at 20,000 mg/kg and GRO at 470 mg/kg, both of which exceed ADEC cleanup criteria. A second excavation was performed to address remaining contamination on October 31, 1995. Samples results from the second excavation met ADEC cleanup levels; however, the samples were collected from an area north of the USTs, which was an area that had already met ADEC cleanup levels. The stockpile soil was transported offsite for thermal treatment by Clean Soils, Inc. on November 19, 1995.

Because the UST Removal and Closure report, as described above, did not provide rationale for the locations of the final confirmation samples, and because several data gaps were identified, ADEC requested additional characterization in a letter dated January 25, 1996.

The data gaps were addressed in a follow up site characterization effort performed in 2016. Samples were collected from six soil borings that were advanced through and around the former UST excavation. Samples were analyzed for GRO, DRO, residual range organics (RRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), and polynuclear aromatic hydrocarbons (PAHs). None of the sample results exceeded the most stringent Method Two migration-to-groundwater 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 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 meet the human health cumulative risk criteria for residential land use.

### 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 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	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is below the most stringent MTG cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below most stringent MTG cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Volatile contaminants are below most stringent MTG cleanup levels; are not present in soils within the top five feet of soil; and are not impacting groundwater.
Groundwater Ingestion	Pathway Incomplete	Groundwater is not impacted.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	The site is asphalt paved and foraging activities are unlikely. Additionally, all remaining contaminants are well below the surface soils, and are below the most stringent MTG cleanup levels.
Exposure to Ecological Receptors	Pathway Incomplete	Terrestrial and aquatic routes are not present.

**Notes to Table 2:** “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be adversely 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 institutional control in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

### ADEC Decision

Soil contamination has been cleaned up to concentrations below the most stringent MTG cleanup levels. 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.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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, P.O. Box 111800, 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) 269-7691 or email at [joshua.barsis@alaska.gov](mailto:joshua.barsis@alaska.gov).

Sincerely,



Joshua Barsis  
Project Manager

cc: Cost Recovery Unit (via email)  
Bernie Cullen (via email)