

## Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE Contaminated Sites Program

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File: 2100.26.251

November 15, 2016

Sent via electronic mail only
Anchorage School District (ASD)
Attn: Kelly Kass, Maintenance/CP&C
1301 Labar Street

Anchorage, AK 99515

Re: ASD Student Transportation Facility, 3580 East Tudor Road, Anchorage, Alaska 99507 Future groundwater monitoring discontinued & groundwater use restrictions applied

**DEC Site Identifiers:** 

Regulatory Authority for Determination:

File No: 2100.26.251

18 AAC 78

Hazard ID: 23598

Dear Ms. Kass:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental record for the referenced site, which includes the 2016 Groundwater Monitoring Report submitted by R&M Consultants, Inc. This letter documents ADEC's approval to discontinue groundwater sampling at the site and have the wells decommissioned.

The site was assigned a No Further Remedial Action Planned (NFRAP) status in 2004. A requirement of the determination included groundwater monitoring until results demonstrated stable or decreasing trends in contaminant concentrations and/or 18 AAC 75.345 Table C levels were achieved.

Groundwater monitoring events following issuance of the NFRAP were completed periodically between 2004 and 2016. Several of the groundwater monitoring wells were decommissioned along the way, as approved by the ADEC.

Contaminant concentrations in the 2016 groundwater samples were above ADEC cleanup levels for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), and benzene; however, these sample concentrations are substantially lower compared to the concentrations at the time of the 2004 closure and demonstrate a decreasing trend.

## **ADEC Decision**

This letter documents ADEC's decision to terminate groundwater monitoring requirements at the site and have the three remaining monitoring wells decommissioned. Since a decreasing trend in groundwater contamination has been established, future sampling will not be required. The groundwater monitoring institutional control requirement has been removed from the ASD Student Transportation Facility site. In its place, an institutional control restricting the use of groundwater for drinking water and other general uses has been added to the site record in order to prevent people from being exposed to the remaining contamination in the groundwater. All other institutional controls remain in effect.

## **ADEC Request**

ADEC requests that you decommission the remaining groundwater monitoring wells within one year of receipt of this letter. The three (3) wells are identified as MW-01, MW-04, and G-04. You must submit a brief report that includes photos verifying that the well was decommissioned in accordance with the 2013 ADEC Monitoring Well Guidance –

http://dec.alaska.gov/spar/csp/guidance\_forms/docs/Monitoring\_Well\_Guidance.pdf.

## \*Please be advised that the following conditions (institutional controls) apply to the ASD Student Transportation Facility site:

- 1. Contamination remains in the groundwater at ASD Student Transportation Facility site.

  Groundwater from the site must not be used for drinking water or any other general uses.
- 2. 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. This is a standard condition.
- 3. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. This is a standard condition.
- 4. Groundwater in the state of Alaska is protected for aquaculture use. In the event that an aquaculture facility uses groundwater from this site in the future, additional treatment may be required to meet aquatic life criteria under 18 AAC 70. This is a standard condition.

In addition to the conditions above, you are required to notify the ADEC if there are any changes in land use or ownership. The ADEC will conduct a periodic review of site conditions on a scheduled basis, every three years. Failure to maintain these requirements may result in re-opening the site by the Contaminated Sites Program, in which case, further remediation could be mandatory.

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 this site may pose an unacceptable risk to human health or the environment.

If you have any questions regarding this site and its requirements, please contact me at (907) 465-5229 or evonne.reese@alaska.gov and I will be glad to assist you.

Anchorage School District ASD Student Transportation Facility

Sincerely,

Evonne Reese

Environmental Program Specialist

Institutional Controls Unit

Note: This letter is being transmitted to you in electronic format only. If you require a paper copy, let us know and we will be happy to provide one to you. In the interest of reducing file space, the Division of SPAR/Contaminated Sites Program is transitioning to electronic transmission of project correspondence.

You may submit any needed documentation electronically. If your submittal exceeds 8 megabytes, you may submit it to me through the Alaska Zend Vo "drop-off" option at <a href="https://drop.state.ak.us/drop/">https://drop.state.ak.us/drop/</a>. The Division of SPAR/Contaminated Sites Program prefers and encourages electronic submittals.