



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 2100.38.476

November 17, 2017

Larry Beck
U.S. Department of the Interior
Bureau of Land Management
Alaska State Office
222 West Seventh Avenue #13
Anchorage, Alaska 99513

Re: Decision Document: BLM Campbell Tract Facility Dry Wells (Hazard ID No. 4319), Skid-Steer Shed Injection Well Source Area 80155, Cleanup Complete Determination

Dear Mr. Beck:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with the BLM Campbell Tract Facility Dry Wells – Skid Steer Injection Well located at 5600 Science Center Drive, Anchorage. Based on the information provided to date, it has been determined that the contaminant concentrations remaining at this source area 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 BLM Campbell Tract Facility Dry Wells, which is located in the DEC office in Fairbanks, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

BLM Campbell Tract Facility Dry Wells
6881 Abbott Loop Rd. /5600 Science Center Dr.
Anchorage, AK 99507

Name and Mailing Address of Contact Party:

Larry Beck
Bureau of Land Management
222 West Seventh Avenue #13
Anchorage, Alaska 99513

DEC Site Identifiers:

File No.: 2100.38.476
Hazard ID.: 4319
Source Area ID: 80155

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

Injection wells associated with various source areas are present on the Campbell Tract Facility. The following describes the source area defined as the Skid-Steer Shed Injection Well.

The Class V Motor Vehicle Waste Disposal Well (MVWDW) located at the Campbell Creek Science Center was constructed in 2000 as part of a skid-steer storage shed and utilized until 2013. The injection well consists of approximately 12 inch diameter PVC pipe, perforated at several locations between four and eight feet below ground surface. The 12 inch diameter pipe was connected to a six foot long trench drain at the surface via a four inch diameter PVC pipe that extended to approximately four feet below ground surface. The trench drain was situated within the sloped concrete slab floor four or six inches in depth. This pipe connection was plugged with concrete in 2003 or 2004. The injection well likely received water, rain, and snowmelt from the skid-steer. There was one known motor oil release within the skid-steer storage shed.

Contaminants of Concern

In 2016, an end-point soil sample was collected from the base of the injection well and analyzed for diesel range organics (DRO), residual range organics, volatile organic compounds, semi-volatile organic compounds, arsenic, cadmium, and lead. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Diesel Range Organics (DRO)

Cleanup Levels

18 AAC 75.341 Table B2, Under 40 Inch Zone, Migration to Groundwater soil cleanup levels are applicable at this site.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
DRO	250

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities

The Bureau of Land Management (BLM) contracted Far North Services and BGES, Inc. to close the injection well located in the skid-steer storage shed in May 2017. This effort was conducted in coordination with the US Environmental Protection Agency (EPA), Region 10, Underground Injection Well Program, which approved closure of this MVWDW October 10, 2017.

The shed and cement pad were removed prior to closure of the well. The area around the well was excavated until the perforated PVC pipe was encountered. Soils were field screened within the excavation and soils were segregated into stockpiles based upon apparent degree of contamination. Seventy-eight cubic yards of soils were excavated and placed on an impermeable liner. Four cubic yards of potentially contaminated soil that exhibited a diesel odor were removed from the vicinity of the well and placed into a truck for transport for thermal remediation.

Ten confirmation samples were collected from the liner stockpiles, base, and sidewalls of the excavation and analyzed for DRO. Excavation base and sidewall soil samples (n = 7) were non-detect (ND) for DRO and stockpile soil samples (n= 3) ranged ND–25.9 mg/kg. Upon confirmation sampling results, the excavation was backfilled with the clean soils. The potentially contaminated soils were transported to Alaska Soil Recycling for thermal treatment and recycling.

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 noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, DEC 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 DEC'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, 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 above cleanup levels is no longer present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	Pathway Incomplete	Contamination above cleanup levels is not present in sub-surface soils.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination above cleanup levels is not present in sub-surface soils.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Contamination above cleanup levels is not present in surface or sub-surface soils.
Groundwater Ingestion	Pathway Incomplete	Contamination no longer remains in soils above migration to groundwater cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Contamination is no longer present at this source area.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Contamination above cleanup levels is no longer present at this source area.

Notes to Table 2: “De Minimis Exposure” means that in DEC’s judgment receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination. “Pathway Incomplete” means that in DEC’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.

DEC Decision

Soil contamination at the Skid-Steer Shed Injection Well Source Area has been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This source area will receive a “Cleanup Complete” designation; however, the BLM Campbell Tract Facility Dry Wells Site will remain “Active” on

the Contaminated Sites Database due to the presence of additional source areas in need of investigation. The Skid-Steer Shed Injection Well Source Area is subject to the following standard conditions:

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires DEC approval in accordance with 18 AAC 75.325(i). 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.
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 75.380 and does not preclude DEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this source area 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.

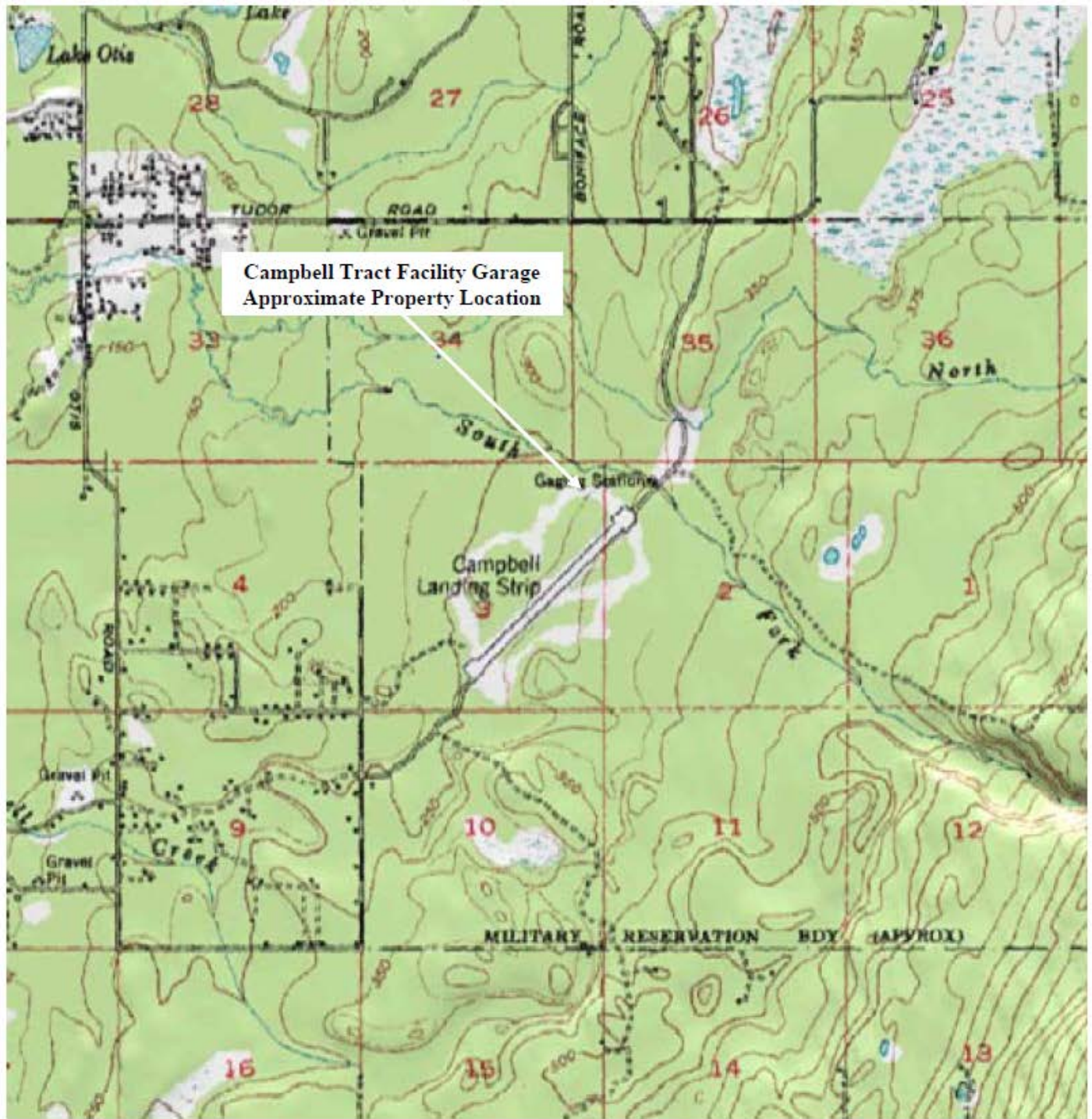
If you have questions about this closure decision, please feel free to contact me at (907) 451-2166, or email at john.carnahan@alaska.gov.

Sincerely,

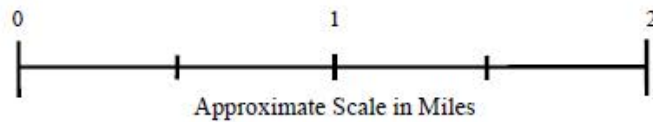
John Carnahan
Project Manager

Attach: Vicinity Map

cc: Spill Prevention and Response, Cost Recovery Unit



Source: USGS Map



BLM Campbell Tract Facility
 5600 Science Center Drive
 Anchorage, Alaska
 Property Vicinity Map