THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 1525.38.002

December 27, 2018

Sent via electronic mail only
Randy Hughey
Sitka Community Land Trust
P.O. Box 6461
Sitka, AK 99835

Re: Decision Document: Sitka Former Public Works
Cleanup Complete Determination

Dear Mr. Hughey:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Sitka Former Public Works located at 1300-1400 Halibut Point Road in Sitka where remedial activities were recently completed. 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 Sitka Former Public Works, 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:
Sitka Former Public Works
1300-1400 Halibut Point Road
Sitka, AK 99835

Name and Mailing Address of Contact Party:
Randy Hughey
Sitka Community Land Trust
P.O. Box 6461
Sitka, AK 99835

DEC Site Identifiers:
File No.: 1525.38.002
Hazard ID.: 3284

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background

The property was previously transferred from the Municipality of Sitka to the Sitka Community Land Trust. The site includes lot 1A of the Little Critter Subdivision and Tracts 1 and 2 of US Survey 500. The site formerly had three ADEC Contaminated Sites database entries: the Sitka Public Works Shop Fleet (ADEC file # 1525.26.005), Sitka Former Public Works (ADEC file # 1525.38.002), and the ADOTPF Sitka Halibut Point Road Maintenance Station (ADEC file # 1525.26.024). The Sitka Public Works Shop Fleet and the ADOTPF Sitka Halibut Point Road Maintenance Station both were added to the ADEC database as a result of leaking underground storage tanks. The Sitka Former Public Works was listed separately on the Contaminated Sites database due to the presence of low-level polychlorinated biphenyl (PCB) contamination, gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), volatile and semi-volatile compounds, and total chromium.

A cleanup action occurred in 2004 which involved the excavation of contamination above site specific soil cleanup levels under 18 AAC 75.340 (Method 3). These cleanup levels were 1,400 milligrams per kilogram (mg/kg) for GRO, 3,800 mg/kg for DRO, and 12,500 mg/kg for RRO. All other contaminants were required to meet 18 AAC 75.341 Tables B1 and B2 migration to groundwater cleanup levels for soil (over 40-inch zone). After the cleanup effort, the site was closed on the ADEC database and a closure letter was sent to the City and Borough of Sitka (the landowner at the time).

The site was reopened in June 2017 following the discovery of petroleum contaminated soil during excavation activities for utility lines (sewer and drinking water). According to the *Site Assessment Report 1306 Halibut Point Road Sitka, Alaska*, prepared by Nortech, dated July 31, 2017, Nortech arrived on site to investigate the contamination and collected samples from the trenches for the sewer and water line, the origination of the utility lines (point 0) and the stockpiled soil. Twelve soil samples were collected from the water trench, nine samples from the sewer trench, and five samples were collected from the stockpiled soil. These were analyzed by SGS Laboratory in Anchorage for GRO, DRO, RRO, volatile organic compounds (VOCs), and semivolatile organic compounds (SVOCs). Three composite samples were collected from the stockpile and analyzed for PCBs.

The results of the investigation found GRO and DRO below the site specific soil cleanup levels under 18 AAC 75.340 (Method 3). GRO concentrations ranged from 0.81-3.83 mg/kg, DRO from 11-3,600 mg/kg, and RRO from 13-1,000 mg/kg. The composite PCB samples met the cleanup level for human health (18 AAC 75.341 Table B) and ranged in concentration from 0.025-0.032 mg/kg. The following four polycyclic aromatic hydrocarbons (PAHs) were detected above the 18 AAC 75.340 Table B2 Method 2 migration to groundwater cleanup levels for soil (over 40-inch zone): naphthalene, benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene at the following respective concentrations: 0.07, 3.9, 3.6, and 4.8 mg/kg. The location of this exceedance was within the sewer trench at sample location CZ-S160. Nortech calculated a site-specific alternative cleanup level (ACL) for the migration to groundwater exposure pathway for these compounds using the ADEC Method 3 calculator and determined the following cleanup levels of 19, 1.7, 0.17, and 1.7 mg/kg for naphthalene, benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene respectively. ADEC approved these alternative cleanup levels. No other contaminants of concern were detected above ADEC cleanup levels. Due to the exceedance of the ACLs for benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene, Nortech submitted a work plan via email to excavate the single location where the exceedances existed (CZ-S160) and the site was re-opened on the ADEC Contaminated Sites database.

Contaminants of Concern
During the site characterization and cleanup activities at this site, samples were collected from soil and analyzed for GRO, DRO, RRO, VOCs, SVOCs, and PCBs. No groundwater or surface water was encountered during the investigation. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene

Cleanup Levels
The responsible party proposed site-specific ACLs for the migration to groundwater exposure pathway for the contaminants of concern using the ADEC Method 3 calculator and the ADEC approved these cleanup levels.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
Benzo(a)anthracene	1.7
Benzo(b)pyrene	0.17
Benzo(b)fluoranthene	1.7

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities
According to the *Site Assessment Report 1306 Halibut Point Road Sitka, Alaska*, dated September 18, 2017, and prepared by Nortech, the area surrounding sample CZ-S160 was excavated. The lateral extent of the excavation was 30 feet by 20 feet. Seven analytical confirmation soil samples and a duplicate were collected and submitted to SGS Laboratory for the analysis of GRO, DRO, RRO, VOCs, and SVOCs. A discrete PCB sample was also submitted; this sample was selected based on the most elevated field screening reading. The laboratory results for the post-excavation confirmation sampling indicated that no analytes were detected above their respective cleanup levels.

According to the Certificate of Destruction, dated October 14, 2018, 160 tons of petroleum contaminated soil was disposed of at the Roosevelt Regional Landfill in Washington.

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, 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 were 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 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	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 cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Residual contaminant concentrations meet the cleanup levels and are not expected to affect indoor air.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered during the investigation and is not used on site for drinking water.
Surface Water Ingestion	Pathway Incomplete	Surface water was not affected by the contamination.
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 is not expected to affect ecological receptors.

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 at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. 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 from a site that is subject to the site cleanup rules or for which a written determination from the department has been made under 18 AAC 75.380(d)(1) that allows contamination to remain at the site above method two soil cleanup levels or groundwater cleanup levels listed in Table C requires ADEC 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 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 20 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) 465-5207, or email at danielle.duncan@alaska.gov.

Sincerely,

Project Manager Name
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit