THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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ADEC File # 1513.38.103

September 27, 2019

Sky Bonnell
Bonnell Development, LLC
P.O. Box 21795
Juneau, Alaska 99802

Re: Decision Document: Industrial Property – 5740 & 5750 Concrete Way
Cleanup Complete Determination

Dear Mr. Bonnell:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Industrial Property – 5740 & 5750 Concrete Way site, located in Juneau. 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 Industrial Property – 5740 & 5750 Concrete Way site, 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:
Industrial Property – 5740 & 5750 Concrete Way
5740 & 5750 Concrete Way
Juneau, AK 99801

Name and Mailing Address of Contact Party:
Sky Bonnell
Bonnell Development, LLC
P.O. Box 27195
Juneau, AK 99802

DEC Site Identifiers:
ADEC File # 1513.38.103
Hazard ID.: 26729

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background
This site is located at 5740 and 5750 Concrete Way in the Lemon Creek valley in Juneau, Alaska. Soil and groundwater characterization activities occurred on both undeveloped lots between 2016 and 2018 to delineate observed contamination from unknown historical spills. Characterization activities and

excavation of contaminated soils for offsite treatment occurred prior to site development activities (grading, paving with asphalt and concrete, etc.). Both lots are zoned industrial and the site was entered into the ADEC Contaminated Sites Database on January 4, 2017.

Contaminants of Concern
During the characterization activities at this site, samples were collected from soil and groundwater for analysis of some or all of the following: gasoline range organics (GRO) by Alaska (AK) Method AK101, diesel range organics (DRO) by AK Method 102, residual range organics (RRO) by Method AK103, and benzene, toluene, ethylbenzene, total xylenes (BTEX) by method EPA 8021B, polyaromatic hydrocarbons (PAH) by method EPA 8270, and volatile organic carbons (VOC) by method EPA 8260B. Based upon the results of these analyses, the following contaminants were detected above ADEC's Method Two Migration to Groundwater (MTG) soil cleanup levels and are considered Contaminants of Concern (COC) at this site:

- Diesel Range Organics (DRO)
- Residual Range Organics (RRO)

Cleanup Levels
The contaminant of concern for this site is DRO and RRO. See Table 1, below. DRO was detected in soil above the MTG cleanup levels for the Under 40-inch precipitation zone, established in 18 AAC 75.341(c), Table B1, and 18 AAC 75.341 (d), Table B2. RRO was detected above the Maximum Allowable Concentrations.

Table 1 – Approved Cleanup Levels

Contaminant	Soil - MTG (mg/kg)	Soil – Human Health (mg/kg)	Soil – Maximum Remaining (mg/kg)
DRO	230	12,500	1,200
RRO	9,700	22,000	5,600

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities
A chronological history of the site is presented below, along with references to the reports where that information was obtained:

"Lots 9 & 10 Concrete Way Soil Investigation"
August 30, 2016 by Carson Dorn, Inc.

On August 8, 2016, eleven soil borings were advanced for field-screening and sampling purposes to characterize historic soil staining at the site. Soil borings were advanced to depths ranging from 4 feet below ground surface (bgs) to 12 feet bgs. Soils were field-screened with a photo-ionization detector and submitted for laboratory analysis of DRO, RRO, GRO, PAHs, and VOCs. Four soil samples from three soil borings confirmed DRO concentrations above ADEC Method Two MTG soil cleanup levels, ranging from 1,100 mg/kg to 8,000 mg/kg, collected at depths from surface to 4 feet bgs. A surface soil sample (CW-6) confirmed RRO concentration at 54,000 mg/kg, which was above the ADEC Method

Two Maximum Allowable soil cleanup level of 22,000 mg/kg. Concentrations of analytes in all other soil samples, if detected, were at concentrations below MTG soil cleanup levels. Groundwater was encountered in several soil borings at a depth of 4 feet bgs.

"Lots 9 & 10 Concrete Way, Alaska – Groundwater Sampling"
September 11, 2017 by Cox Environmental Services

Three groundwater monitoring wells (MW-1, MW-2, and MW-3) were installed on August 18, 2017 to delineate the extent of groundwater contamination at the site. MW-1 and MW-2 were developed on August 24, 2017. A thin seam of groundwater was encountered during the excavation and installation of MW-2, but the well was dry after installation. On August 29, all three groundwater monitoring wells were gauged, but only MW-1 & MW-3 were sampled. Groundwater samples were analyzed for diesel range organics (DRO) and residual range organics (RRO). Neither analytes were detected in the groundwater samples from MW-1, nor MW-3. The monitoring wells were then decommissioned by removal in preparation for the future soil cleanup work, site grading, and development.

"*Cleanup Report: Lots 9 & 10 Concrete Way"*
October 2018 by Cox Environmental Services

Site assessment activities were conducted on April 6, 2018 and included excavation, stockpiling soil, field-screening, and confirmation soil sampling. Two excavations occurred for the purpose of removing contaminated soil from locations CW-5 and CW-6. Both excavations were dug to 4 feet bgs and removed soil contamination with DRO and RRO concentrations above MTG and Maximum Allowable soil cleanup levels. Remaining DRO and RRO concentrations in both excavation areas are below MTG soil cleanup levels. DRO concentration of 1,200 mg/kg at soil sample location CW-11 (August 2016) remains in subsurface soils (3 feet to 4 feet bgs), under concrete and asphalt, but groundwater is not contaminated. Approximately 15 cubic yards of excavated soils were transported offsite for disposal at Bicknell Soil Treatment Facility.

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 human health.

Exposure Pathway Evaluation
Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ADEC's Exposure Tracking Model (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	2016-2018 soil characterization and excavation activities confirm remaining contaminant concentrations are below human health, inhalation, and ingestion soil cleanup levels in surface soils. The site is developed with concrete and asphalt cap.
Sub-Surface Soil Contact	De-Minimis Exposure	2016-2018 soil characterization and excavation activities confirm remaining contaminant concentrations are below human health, inhalation, and ingestion soil cleanup levels in subsurface soils. Site is developed with concrete and asphalt cap.
Inhalation – Outdoor Air	Pathway Incomplete	2016-2018 soil characterization and excavation activities confirm remaining contaminant concentrations are below inhalation soil cleanup levels. Site is developed with concrete and asphalt cap.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	No volatile contaminants are present in the soil or groundwater at this site.
Groundwater Ingestion	Pathway Incomplete	2017 groundwater investigation confirmed that Contaminants were not detected. Site is developed with asphalt and concrete cap.
Surface Water Ingestion	Pathway Incomplete	No surface water bodies at the site. Lemon Creek borders northwestern edge of property, but soil and groundwater characterization confirm remaining contamination has not & will not migrate offsite. Site is developed with concrete and asphalt.
Wild and Farmed Foods Ingestion	Pathway Incomplete	No hunting or harvesting occurs at this site. Site is developed and paved with asphalt or capped with concrete. Property is located within industrial or commercial-zoned area.
Exposure to Ecological Receptors	Pathway Incomplete	2016 and 2018 characterization activities confirm that groundwater is not contaminated. DRO contamination in subsurface soil remain above MTG soil cleanup levels, but below Method Two Human Health soil cleanup levels. Site is developed with concrete and asphalt.

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.

ADEC Decision

Petroleum contamination remains in subsurface soils above MTG soil cleanup levels, but below Human Health soil cleanup levels. Remaining soil contamination has been demonstrated to not pose a migration to groundwater risk as groundwater is not contaminated. ADEC has determined that sufficient site characterization has been completed and contaminants in soil have achieved steady-state equilibrium and will not migrate to groundwater 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 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 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, 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) 465-5368 or email at amy.rodman@alaska.gov.

Sincerely,

Amy Rodman
Project Manager

cc: ADEC SPAR Cost Recovery Unit