



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: 2320.38.057

September 16, 2020

Steve Brigham & Geri Brigham
7825 Kenai Spur Highway
Kenai, AK 99611

Re: Decision Document: Quonset Hut Apartments
Cleanup Complete Determination

Dear Mrs. & Mr. Brigham:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Quonset Hut Apartments located at 7825 Kenai Spur Highway, Kenai. 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 Quonset Hut Apartments, 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:

Quonset Hut Apartments
7825 Kenai Spur Highway
Kenai, AK 99611

Name and Mailing Address of Contact Party:

Steve Brigham & Geri Brigham
7825 Kenai Spur Highway
Kenai, AK 99611

DEC Site Identifiers:

File No.: 2320.38.057

Hazard ID.: 4593

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

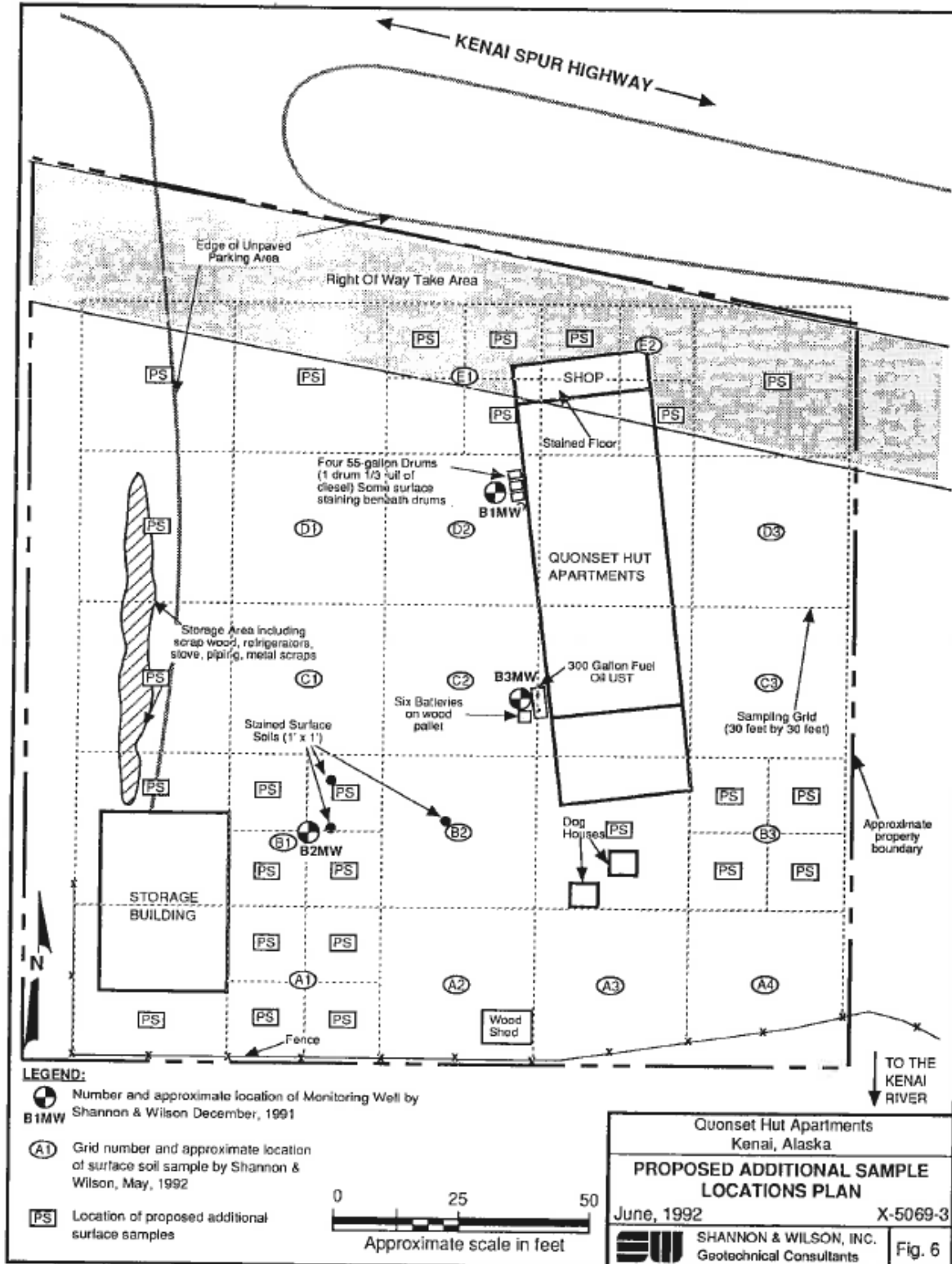
The site is currently used primarily as a residential lot. The site was documented to be contaminated with polychlorinated biphenyls (PCBs). The first assessment and sampling work that identified the PCB contamination was completed in late 1991, under contract to the Alaska Department of

Transportation & Public Facilities (ADOT). ADOT was considering expanding the Kenai Spur Highway right-of-way and funded environmental assessment work to support their options for right-of-way property acquisitions. Soil and groundwater samples were collected for laboratory analysis in December, 1991 and again in May, 1992.

Two soil samples exceeded ADEC's current soil cleanup level (CUL) for PCBs, which is set at 1 mg/kg (1 part per million). The December 1991 sampling event detected levels of PCBs exceeding ADEC Cleanup Levels at 15.2 mg/kg. The May 1992 sampling event detected levels of PCBs exceeding ADEC Cleanup Levels at 22 mg/kg. All groundwater samples were non-detect for PCBs during the December 1991 and May 1992 event.

Figure 1, excerpted from the June, 1992 *Additional Field Explorations* report, shows the two soil sample collection locations which exceeded ADEC cleanup levels (B2 and A1). Based on this prior assessment work, the PCB contamination did not appear to be widespread across the property. The source of the PCB contamination was never determined, even though the history of the property was investigated and aerial photographs were obtained and reviewed as part of that effort.

Figure 1: 1991 & 1992 Sampling Locations



Cleanup Levels

The Human Health cleanup level applies to this site. PCBs were detected in soil above the Human Health cleanup levels established in 18 AAC 75.340 (c), Table B1. Migration to groundwater soil cleanup levels are not applicable for PCBs.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg/ PPM)
PCBs	1

mg/kg = milligrams per kilogram

PPM = parts per million

Characterization and Cleanup Activities

Additional site characterization under 18 AAC 75.335 was conducted in 2020 (Figure 2). Sampling included two incremental sampling methodology (ISM) soil decision units placed over the former locations of PCB exceedances. Low concentrations of PCBs were detected in soil samples from each of the decision units. One analytical sample, a duplicate, and a triplicate were collected from the soils in each decision unit at the site. In addition, one discrete sample was collected from both decision units at the location nearest the known location of PCB exceedances documented in the 1991 and 1992 sampling reports. All samples were collected from between 6 inches and 18 inches below ground surface. The soil was analyzed for PCBs and the maximum concentration recorded was 0.996 mg/kg or PPM.

Figure 2: 2020 Sampling Locations

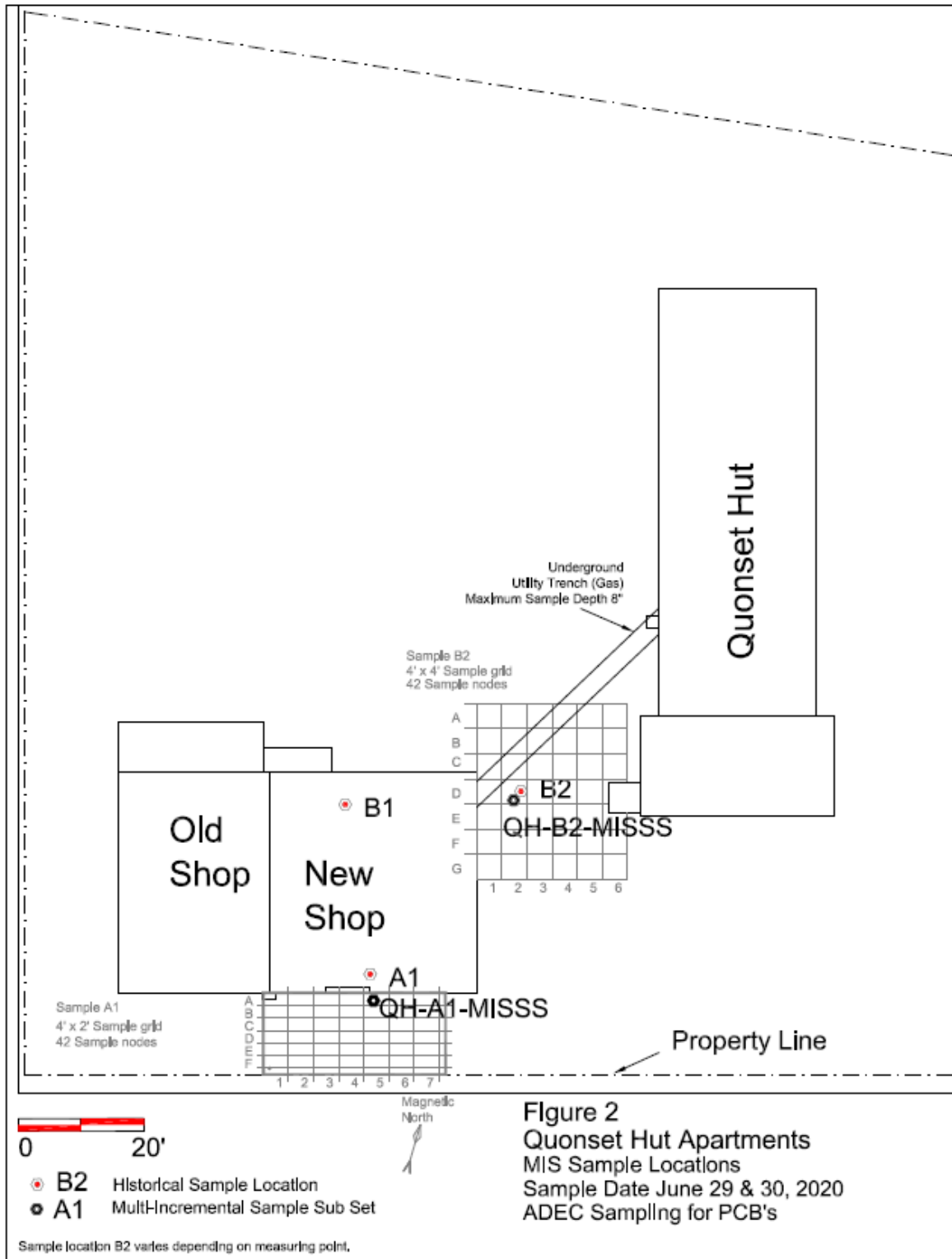


Table 2- Contaminant Maximum Remaining in Soil

Contaminant	Maximum Remaining in Soil (mg/kg)/(PPM)
PCBs	.996

Cumulative Risk Evaluation Cumulative risk must be addressed Method 3 calculator

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 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 or Pathway Incomplete. A summary of this pathway evaluation is included in Table 3.

Table 3 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	Contamination is present in surface soil (0 to 2 feet below ground surface) but meets cleanup levels.
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is below cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination remains in the sub-surface, but is below cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Contamination remains in the sub-surface, but is below cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not impacted by contamination.
Surface Water Ingestion	Pathway Incomplete	Surface water was not impacted by contamination.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do have the potential to bioaccumulate, but are de-minimis in area and volume.
Exposure to Ecological Receptors	Pathway Incomplete	Contamination is deminimis in area and volume, and water resources were not affected.

Notes to Table 3:

“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. “Pathway Incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors.

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. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
2. 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.

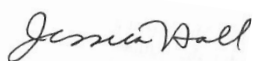
This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

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) 269-7553, or email at jessica.hall@alaska.gov.

Sincerely,



Jessica Hall
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit