



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 No.: 2601.38.104
Hazard ID: 4543

July 17, 2023

Gregory Spalinger
P.O. Box 2635
Kodiak, AK 99615

**Re: Decision Document: Kodiak Council on Alcoholism
Cleanup Complete Determination**

Dear Mr. Spalinger:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with the Kodiak Council on Alcoholism site located at 115 Mill Bay Road in Kodiak. 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 information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Kodiak Council on Alcoholism site maintained by DEC. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

Kodiak Council on Alcoholism
115 Mill Bay Road
Kodiak, AK 99615

Name and Mailing Address of Contact Party:

Gregory Spalinger
P.O. Box 2635
Kodiak, AK 99615

ADEC Site Identifiers:

File No.: 2601.38.104
Hazard ID: 4543

Regulatory Authority for Determination:

18 Alaska Administrative Code (AAC) 75

Site Description and Background:

The site is located at New Kodiak Subdivision, Block 14, Lot 6A (formerly Lots 6 and 10, replatted in 2021. See attached figure). The property encompasses approximately 0.7 acres and has a two-story structure that has been used for outpatient services since the 1970s. In 2006 a Phase I Environmental Site Assessment (ESA), interviews revealed that an underground heating oil tank (HOT) had been closed on the property in 2005. No reports or other documents were found documenting the closure of the tank. During a Phase II ESA test pits were excavated to find the tank. The top of the tank was

approximately 3 feet below ground surface (bgs) and the base of the tank was approximately 8 feet bgs. The tank was corroded, with holes and pitting observed. Groundwater was observed in the excavation around the HOT at 6-7.5 feet bgs and in TP-1 at 5 feet bgs. No water observed in TP-2, northwest of the tank.

Three soil samples were collected between 7.5 and 8 feet below ground surface (bgs) and analyzed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), benzene, toluene, ethylbenzene, and xylenes. The HOT and associated underground piping were near the northeast east wall of the structure. Samples collected during the Phase II ESA identified petroleum contamination. DRO was detected up to 7,540 mg/kg, ethylbenzene was detected up to 2.46 mg/kg, and total xylenes were detected up to 15.52 mg/kg, exceeding the current migration to groundwater cleanup levels.

Contaminants of Concern:

During the site characterization and cleanup activities at this site, samples were collected from soil and groundwater and analyzed for DRO, gasoline range organics (GRO), residual range organics (RRO), volatile organic carbons (VOCs), and polycyclic aromatic hydrocarbons (PAH). Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern (COCs) at this site:

- DRO
- ethylbenzene
- total xylenes
- 1,2,4-trimethylbenzene
- naphthalene
- 1-methylnaphthalene
- 2-methylnaphthalene

Cleanup Levels

Shown below in Table 1, soil cleanup levels applicable to the site are the most stringent Method 2 cleanup levels for the over 40-inches of precipitation climate zone found in 18 AAC 75.341(c), Table B1 and 18 AAC 75.341(d), Table B2.

Table 1- Approved Cleanup Levels

Contaminant	Soil- migration to groundwater mg/kg	Soil- human health mg/kg
DRO	230	8,250
ethylbenzene	0.13	35
total xylenes	1.5	57
1,2,4 trimethylbenzene	0.61	43
naphthalene	0.038	20
1-methylnaphthalene	0.41	68
2-methylnaphthalene	1.3	250

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities:

In May 2019 the 2,000-gallon HOT was removed by excavation. The excavation extended to 8 feet bgs and groundwater was encountered at 7.5 feet. Sheen was observed on the groundwater. Eight soil confirmation samples were collected and DRO, 1,2,4-trimethylbenzene, naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene were detected above cleanup levels. Nine supersacks of contaminated soil were excavated and disposed of offsite at an approved facility.

Three test pits were excavated to evaluate the extent of contamination. Test pit 1 met refusal on bedrock at 8 feet bgs. Contaminants were not detected above the cleanup level in soil samples and groundwater was not encountered. Test pit 2 met refusal on bedrock at 7 feet bgs, contaminants were not detected in soil. A groundwater sample from a temporary well point did not contain detectable concentrations of contaminants. TP3 encountered groundwater at approximately 5 feet bgs. The soil sample from test Pit 3 contained DRO at 1,370 mg/kg. A sample from the temporary well point at this location contained DRO at 1.71 mg/l.

In August 2020 additional site characterization activities were conducted including the excavation of three additional test pits, soil sampling, and attempts to install temporary wells generally downgradient of the former HOT on the southeast half of the property. Test pits TP4A, TP4B, and TP5 were excavated until refusal at 7.6 feet bgs, 8.8 feet bgs, and 7.5 feet bgs, respectively. One soil sample each was collected from TP4A and TP5. Two samples were collected from TP4B. All soil samples were analyzed for DRO, GRO, PAH, and VOC. One sample, collected near the base of TP4B had an exceedance of naphthalene at 0.144 mg/kg. Temporary wells were installed to the bedrock in the three test pits, but were dry after 24 hours. Due to shallow bedrock and the ephemeral nature of groundwater at this site, risk via the migration to groundwater pathway is considered de minimis.

Remaining Contamination

The maximum concentrations of contaminants remaining at the site are shown in Table 2. Sample locations shown in the attached site figure.

Table 2 – Maximum Contaminant Concentrations Remaining in Soil

Analyte	Soil (mg/kg)	Sample Location	Date Sampled
DRO	5,900	UST-127	12/07/2006
ethylbenzene	0.029	UST-127	12/07/2006
total xylenes	0.24	TP-3	12/07/2006
1,2,4-trimethylbenzene	1.26	UST-127	05/24/2019
naphthalene	0.458	UST-127	05/24/2019
1-methylnaphthalene	1.49	UST-127	05/24/2019
2-methylnaphthalene	0.779	UST-127	05/24/2019

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 (HI) of 1 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 ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. The 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	Contaminated surface soil was removed during the excavation of the UST area.
Sub-Surface Soil Contact	De Minimis Exposure	Contamination remains in the subsurface below human health (inclusive of direct contact) and ingestion levels in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Outdoor Air	De Minimis Exposure	Contamination remains in the subsurface below human health and inhalation levels in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	The remaining subsurface soil contamination is considered a de minimis risk via this pathway
Groundwater Ingestion	De Minimis Exposure	Due to shallow bedrock and ephemeral groundwater, the migration to groundwater pathway is considered incomplete
Surface Water Ingestion	Pathway Incomplete	Surface water is not present on or near the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals. Foraging is not expected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	Surface water is not present on or near the site where aquatic life could be affected.

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.

DEC Decision:

Soil contamination at the site has 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.

DEC approval is required for movement and disposal of soil and/or groundwater subject to the Site Cleanup Rules, in accordance with 18 AAC 75.325(i). Please contact DEC for information about applicable regulations and requirements. A “site”, as defined by 18 AAC 75.990, means an area that

is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

Movement or use of contaminated material in an ecologically sensitive area or in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. Furthermore, 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. If, in the future, groundwater from this site is to be used for other purposes, additional testing and treatment may be required to ensure the water is suitable for its intended use.

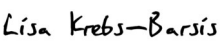
This determination is in accordance with 18 AAC 75.380 and does not preclude DEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to Human Health, safety, or welfare or to the environment.

Informal Reviews and Adjudicatory Hearings

A person authorized under a provision of 18 AAC 15 may request an informal review of a contested decision by the Division Director in accordance with 18 AAC 15.185 and/or an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340. See DEC's "Appeal a DEC Decision" web page <https://dec.alaska.gov/commish/review-guidance/> for access to the required forms and guidance on the appeal process. Please provide a courtesy copy of the adjudicatory hearing request in an electronic format to the parties required to be served under 18 AAC 15.200. Requests must be submitted no later than the deadline specified in 18 AAC 15.

If you have questions about this closure decision, please feel free to contact me at (907) 269-7691 or lisa.krebs-barsis@alaska.gov.

Sincerely,

DocuSigned by:

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Lisa Krebs-Barsis
Project Manager

Electronic cc: ADEC SPAR Cost Recovery via dec.spar.cr@alaska.gov;
David Nyman, RSE via dnyman@restorsci.com.

Attachment: Site Figure

