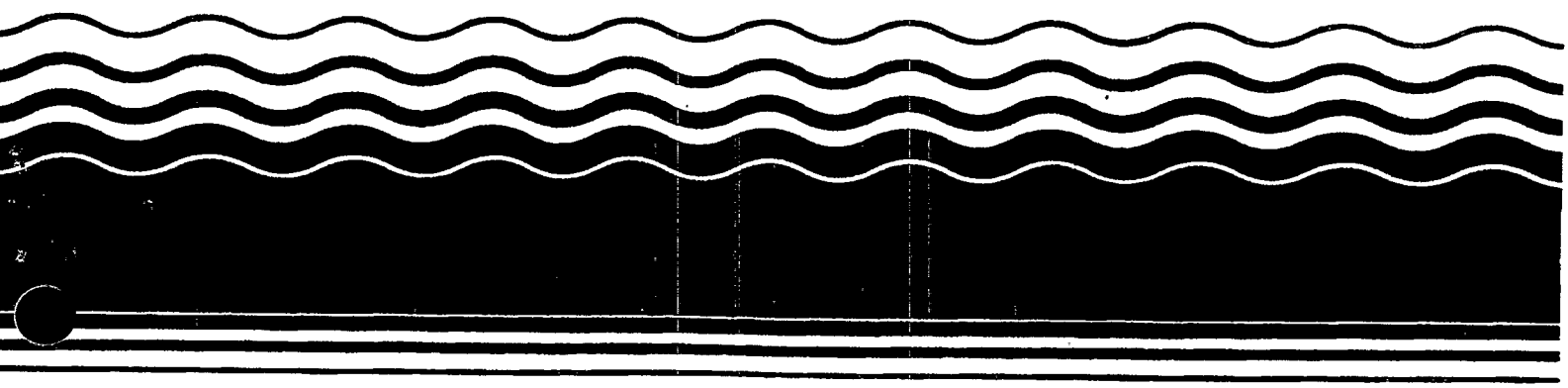
PB99-963108
EPA541-R99-037
1999

EPA Superfund
Explanation of Significant Difference for the Record of Decision:

Standard Steel and Metals Salvage Yard Site
Anchorage, AK
11/18/1998



STANDARD STEEL AND METALS SALVAGE YARD
EXPLANATION OF SIGNIFICANT DIFFERENCE

I. Introduction:

This document presents an Explanation of Significant Difference (ESD) for the Record of Decision (ROD) for the Standard Steel and Metals Salvage Yard Site in Anchorage, Alaska. The ROD was signed by the U.S. Environmental Protection Agency (EPA) on July 16, 1996.

The Standard Steel and Metals Salvage Yard (site) was listed on the National Priorities List (NPL) on August 30, 1990 under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The lead agency for the Site is the EPA. This ESD, prepared in accordance with Section 117 (c) of CERCLA and 40 CFR 300.435c(2)(i), is necessary to document the waiver of 40 CFR 761.75(b)(9)(i), which requires a six foot woven mesh fence, wall, or similar device. The State of Alaska Department of Environmental Conservation supports the need for this ESD.

The selected remedy for the Site addressed the potential risks posed by Polychlorinated biphenyls and lead in soils at the site by treating the soils via stabilization and containment in an on-site Toxic Substances Control Act (TSCA) landfill. The Remedial Action Objectives of the selected remedy are:

- Prevent exposure by inhalation, ingestion, and dermal contact with contaminated soils that would result in an excess lifetime carcinogenic risk above 1E-4 for industrial use, and off-site non-industrial use;
- Prevent exposure by inhalation, ingestion, and dermal contact with contaminated soils that would result in noncarcinogenic health effects as indicated by an HI greater than 1.0;
- Prevent off-site migration of contaminants caused by mechanical transport, surface water runoff, flood events, and wind erosion;
- Prevent leaching or migration of soil contaminants into groundwater that would result in groundwater contamination in excess of regulatory standards.

The major components of the selected remedy are:

1. Removal of regulated material stockpiled on-site and investigation derived wastes with subsequent disposal in a RCRA subtitle C or D landfill, or recycling of materials;

2. Off-site disposal of remaining scrap debris by recycling or disposal in a RCRA Subtitle D or, if the debris is a characteristic hazardous waste or contains greater than 50 mg/kg PCBs or 10 ug/100 cm^2 by standard wipe tests, treatment and disposal in a RCRA Subtitle C or TSCA landfill;

3. Excavation and consolidation of all soils exceeding a 10 mg/kg PCBs or 1000 mg/kg lead cleanup level;

4. Treatment of all soils at or greater than 1000 mg/kg lead or 50 mg/kg PCBs, or greater, by stabilization/solidification;

5. On-site disposal of stabilized/solidified soils and excavated soils between 10 mg/kg and 50 mg/kg PCBs in a TSCA landfill;

6. Excavation of soils impacted above 1 mg/kg PCBs and 500 mg/kg lead from the flood plain and consolidation of these soils elsewhere on the site;

7. Maintenance and repair of erosion control structure on bank of Ship Creek;

8. Maintenance of solidified/stabilized soils and the landfill;

9. Institutional Controls to limit land uses of the site and, if appropriate, access;

10. Monitoring of groundwater at the site to ensure the effectiveness of the remedial action.

All of the major components of the selected remedy have been completed with the exception of the maintenance of the erosion control structure. This task will be completed in the Spring of 1999.

This ESD will become part of the Administrative Record file pursuant to Section 300.825(a)(2) of the National Oil and Hazardous Substance Pollution Contingency Plan (NCP).

II. Summary of Site History, Contamination Problems, and Selected Remedy

Standard Steel and Metals Salvage Yard (site) is located on a 6.2 acre parcel of land in Anchorage, Alaska. Legal title to the land is held by the Federal Railroad Administration, but the property and facilities are managed, and in the possession of the Alaska Railroad Corporation under an exclusive license. The site is situated in an industrialized area of Anchorage along the north bank of Ship Creek. The site has been used as a scrap yard since 1955. Electrical transformers and batteries are the main source of contamination at the site.

In 1986 EPA conducted a three phase removal action to address releases of Polychlorinated biphenyls (PCB) and lead. EPA removed all PCB contaminated liquids, eighty two barrels of

RCRA waste, 780,000 pounds of batteries, 185 electrical transformers, stockpiled contaminated soils, erected a security fence and erosion control wall, and dismantled and stored an on-site incinerator used for salvage operations.

On September 23, 1992 Chugach Electric Association, one of 8 PRPs, entered into a Consent Agreement to conduct a RI/FS on the site. The conclusions of the RI/FS were that site soils are contaminated primarily with PCBs and lead. Surface soils were the most contaminated area with three subsurface PCB hotspots, one of which is a light, non-aqueous phase liquid (LNAPL). Surface waters and sediments were not impacted by site releases nor is off-site groundwater. On-site groundwater was contaminated in the areas adjacent to the LNAPL, but not significantly (2 detections above MCLs).

PCB concentrations at the site varied from non-detect to 10,500 mg/kg. 212 samples were collected during the course of the RI/FS. 29 samples had concentrations above 50 mg/kg. 3 subsurface samples were above 50 mg/kg. The LNAPL located in the center of the site was very viscous and samples indicated it could be removed with conventional excavation equipment.

Lead concentrations varied from around 30 mg/kg to 24,000 mg/kg. All lead detections above 500 mg/kg were located in surface soils. All lead concentrations above 1,000 mg/kg were located in areas with greater than 10 mg/kg PCBs.

Cleanup levels selected for the site were: 10 mg/kg PCBs and 1000 mg/kg lead in soils. Soils with PCB concentrations above 50 mg/kg and/or lead concentrations above 1000 mg/kg would require treatment. These levels are consistent with other industrial cleanup levels at Superfund Sites and will reduce the risk to 1 in 1,000,000 additional chance of developing cancer in exposed individuals.

A Consent Decree for Remedial Design/Remedial Action was signed by Alaska Railroad Corporation, Chugach Electric Association, Inc., Westinghouse Electric Corporation, Sears, Roebuck and Company, J. C. Penney Company, Inc., and Bridgestone/Firestone, Inc. The Consent Decree was entered on January 26, 1998. Among other requirements, the CD required the respondents to design and implement the selected remedy in the ROD.

The Selected Remedy was implemented in 1998. After the approval of the Remedial Design and Remedial Action Work Plans, the settling defendants began remedial action. Site clearing and debris disposal began in May 1998. The containment cell was constructed in June. Contaminated soils, and the LNAPL, were treated and disposed of from June through September. The containment cell was capped in October and the erosion control wall was constructed in September and October. Revegetation and removal of the original erosion control wall will be completed in 1999. Ground water monitoring and maintenance of the Landfill will continue annually for five years and be evaluated during five year reviews.

III. Description of the Significant Differences and the Basis for those Differences

This ESD was determined necessary to document the waiver of 40 CFR 761.75(b)(9)(i), fence or barrier controls at TSCA landfills, for the on-site TSCA landfill. The intent of 40 CFR 761.75(b)(9)(i) is to prevent unauthorized persons or animals from entering the landfill and being exposed to PCBs.

The ROD provided for a waiver of a 6 foot high woven mesh fence, wall, or similar device, if the site was constructed as either a building foundation or a parking lot. The ROD required that the treated contaminated soils in the containment cell be covered with clean soil to support a vegetative cover or paved over to prevent erosion of surface soil. The ROD selected industrial cleanup levels of 10 mg/Kg PCBs and 1000mg/Kg lead for surface soils at the site and therefore required access restrictions to prevent exposure to individuals, except short or long-term workers.

The approved design was enhanced by excavating and consolidating all upland surface soils outside the limits of the TSCA landfill which exceed 1.0 mg/Kg PCBs or 500 mg/Kg lead and adding a Geomembrane cover system, consisting of a four inch foam layer, 40-mil Geomembrane impermeable liner, geonet drainage layer, geonet filter fabric and three feet of clean soil. The addition of the Geomembrane cover system and three feet of soil exceeds the design requirements of the ROD and satisfies the intent of 40 CFR 761.75(b)(9)(i). Institutional Controls in the ROD and agreed to by the Alaska Railroad Corporation in the Consent Decree provide notice of the TSCA landfill to the landowner, lessees, and local utilities, and will prevent excavation, construction, or other incompatible uses at the Site.

IV. Proposed Approach

The ROD determined that, depending upon the final design, waiving 40 CFR 761.75(b)(9)(i) would not present an unreasonable risk of injury to health or the environment from PCBs, as required by 40 CFR 761.75(c)(4). This ESD waives 40 CFR 761.75(b)(9)(i). Institutional Controls in the ROD and Consent Decree will be utilized to ensure the cover system is maintained and use of the site is consistent with the selected remedy.

V. Affirmation of the Statutory Determinations

The modified remedy continues to satisfy the requirements of CERCLA section 121. Considering the new information and results of the Pre-Final Construction Completion Inspection, EPA believes that the remedy 1) remains protective of human health and the environment, 2) complies with Federal and State requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action at the time the ROD was signed, and 3) is also cost effective with regard to the risk imposed.

VI. Public Participation

A Community Relations Plan (CRP) was prepared in 1991 in accordance with CERCLA, as amended by SARA. The CRP includes establishing information repositories and communication pathways to disseminate information.

This ESD will become part of the Administrative Record File as required by NCP 300.825(a)(2).

Notice will be issued in the Anchorage Daily, that this ESD and contents of the Administrative Record File are available for public review. Copies of the ESD will be available to the public at the information repositories listed below:

Alaska Resources Library
U.S. Bureau of Land Management
222 W. 7th #36
Anchorage, Alaska 99513
(907) 271-5025

EPA Regional Headquarters
Seventh Floor Records Center
1200 Sixth Avenue
Seattle, Washington 98101
(206) 553-4494

Michael F. Gearheard, Associate Director
Environmental Cleanup Office

Nov. 18, 1998
Date

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