

# STATE OF ALASKA

## DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2100.26.558

March 12, 2009

Stephen Helms, President  
Greer Tank, Inc.  
P.O. Box 190708  
Anchorage, AK 99519-0708

Re: Greer Tank Yard - USTs; 2921 West International Airport Road  
Record of Decision – Corrective Action Complete Determination

Dear Mr. Helms:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with Greer Tank Yard - USTs: Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

This decision is based on the administrative record for Greer Tank Yard USTs, which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Corrective Action Complete Determination.

### **Introduction**

#### Site Name and Location:

Greer Tank Yard - USTs  
2921 West International Airport Road  
Anchorage, Alaska 99502  
S1/2, NE1/4, Sec. 35, T13N, R42, S.M.

#### Name and Mailing Address of Contact Party:

Stephen Helms, President  
Greer Tank, Inc.  
P.O. Box 190708  
Anchorage, AK 99519-0708

Database Record Key and File Number:

File: # 2100.26.558

Hazard ID: 25249

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

**Background**

On August 28, 1991, petroleum impacted soil was encountered during the removal of two regulated 1,500 gallon underground storage tanks (USTs): a diesel and gasoline; and associated piping, located in the southeast section of the Greer property. At the diesel UST, contamination was noted in the soil surrounding the fill pipes. At the gasoline UST, contamination was not encountered.

**Contaminants of Concern**

During the investigation at this site, soil and water samples were analyzed for halogenated volatile organics (HVO); diesel range organics (DRO); gasoline range organics (GRO); Residual Range Organics (RRO); lead; and benzene, toluene, ethylbenzene, and xylene (BTEX). Based on these analyses and knowledge of the source area, the following *Contaminant of Concern* was identified:

- Benzene

**Cleanup Levels**

The soil cleanup levels for this site are established in 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Benzene	0.025

**Site Characterization and Cleanup Actions**

After the USTs removal on August 28, 1991, the total depth of the excavation measured 8 feet below ground surface (bgs), which was to the base of the tanks, and encompassed approximately 240 cubic square feet. A total of four soil samples collected from the excavation floor of the former USTs contained benzene up to 0.032 mg/kg.<sup>1)</sup> The soils, which were removed from the excavation, were separated into contaminated and uncontaminated stockpiles based on screening readings and analytical samples. Soil samples collected from the soil stockpile considered uncontaminated at the time (Matrix Level B), which was backfilled into the excavation, contained up to 0.036 mg/kg benzene, up to 8.99 mg/kg volatile petroleum hydrocarbons (VPH or equivalent to GRO), up to 69.5 mg/kg extractable petroleum hydrocarbons (EPH or equivalent to DRO), and up to 1.21 mg/kg total BTEX (benzene, toluene, ethylbenzene and total xylenes). The remaining 10 cubic yards (14.6 tons) from the contaminated soil stockpile was taken to Alaska Pollution Control, Inc.'s Chemron Plant in Palmer for thermal remediation.

1) In 1991, soil samples for volatiles were not preserved in the field and currently methanol is used as a preservative. Therefore, the analytical soil samples collected from the excavation and soil stockpiles are considered bias low due to lack of methanol preservation.

On June 14, 1991, monitoring well B-8/MW1 was installed within 100 feet south of the former UST excavation area. A soil boring sample collected at 5 to 6.5 feet bgs, contained petroleum constituents, but below applicable ADEC cleanup levels at the time and currently (i.e., 170 mg/kg total petroleum hydrocarbons (TPH) or about equivalent to DRO plus RRO). A groundwater sample collected from the monitoring well also contained petroleum constituents, but below ADEC cleanup levels at the time and currently (i.e., 1 mg/L TPH).

### **Pathway Evaluation**

The exposure pathways for human health that were evaluated include the following: ingestion of soil and groundwater, indoor and outdoor inhalation of vapors, and direct contact with soil. These pathways may be complete, but the remaining contaminant concentrations do not exceed inhalation and ingestion cleanup levels.

The migration to groundwater pathway may be complete, but drinking water is supplied from the city of Anchorage. Benzene (the only contaminant of concern) was found in only two soil samples just above the most stringent current 18 AAC 75.341 ADEC cleanup levels, i.e., 0.025 mg/kg for the migration to groundwater pathway. The analytical results may be biased low due to lack of methanol preservation, but the soil was analyzed 18 years ago in 1991. Therefore, any potentially remaining contamination is assumed to have naturally attenuated and is considered "de minimis" in nature.

The exposure pathway analysis above was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be either De minimis or Incomplete.

### **ADEC Decision**

The characterization activities to date have served to adequately evaluate the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no risk to human health or the environment, and this site will be closed on the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.600(h). However, due to the *de minimis* nature of the remaining contamination at the site, this letter will serve as your approval to transport soil off site in the future. It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

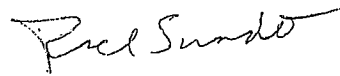
### **Appeal**

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, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 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, Juneau, Alaska 99801, 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 decision document, please contact the ADEC Project Manager, Bill Petrik at (907) 269-7546.

Sincerely,



Rich Sundet  
Environmental Manager

Cc: Bill Petrik, CSP, Anchorage  
Veris Lunasin, SPAR, Juneau  
David Clark, Esq., Anchorage