

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2100.26.076

Return Receipt Requested

Article No: 7009 2820 0001 7169 6842

May 10, 2011

Matt Lindsey, Vice President of Operation
Shoreside Petroleum Inc
P.O. Box 1189
Seward, AK 99664

Re: Closure Decision Document; Petro Products Office
Corrective Action Complete Determination

Dear Mr. Lindsey:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP), has completed a review of the environmental records associated with the Petro Products Office. Based on the information provided to date and the administrative record, 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 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:

Petro Products Office
6401 Lake Otis Parkway
Anchorage, AK 99507

Name and Mailing Address of Contact Party:

Matt Lindsey, Vice President of Operation
Shoreside Petroleum Inc
P.O. Box 1189
Seward, AK 99664

ADEC Site Identifiers

File#: 2100.26.076

Hazard ID: 24268

Reckey: 1999210033501

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

Background

This site is located along the eastern side of Lake Otis Parkway just north of Little Campbell Creek. There is an active contaminated site situated adjacent to the subject site known as *Tesoro - Petro Products* (formerly *Renner's Gas & Save*), Hazard ID 23361.

In 1999, petroleum contamination was discovered at the subject site during the decommissioning of three regulated underground storage tanks (USTs) and associated piping. The USTs are identified as Tanks 1 – 3 in the DEC Underground Storage Tank (UST) database, and were removed from the Southern Card-Lock System area which is near Petro’s fenced storage yard; and the Northern Card Lock System area, which is near Petro’s main office building. The 8,000-gallon diesel UST (Tank 2) was associated with the Southern Card Lock System. A 3,000-gallon diesel UST (Tank 1) and the 500-gallon gasoline UST (Tank 3) were associated with the Northern Card Lock System.

Soil encountered at the diesel USTs, (Tank 1 and Tank 2) contained contaminant concentrations above the ADEC cleanup levels. Soil encountered at the gasoline UST (Tank 3) did not contain contaminants above the most conservative ADEC cleanup levels for the contaminants of concern.

Contaminants of Concern

During the investigations at this site, soil and water samples were analyzed for the following: diesel range organics (DRO); gasoline range organics (GRO); residual range organics (RRO); polycyclic aromatic hydrocarbons (PAHs); and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Benzene
- Diesel Range Organics

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, under 40 inch Zone, *Migration to Groundwater (MGW)*.

<u>Contaminant</u>	<u>MGW Cleanup Level (mg/kg)</u>
Benzene	0.025
Diesel Range Organics	250

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

<u>Contaminant</u>	<u>MGW Cleanup Level (mg/L)</u>
Benzene	0.005
Diesel Range Organics	1.5

Site Characterization and Cleanup Actions

Site characterization activities were conducted during the tank removals in 1999. Two soil samples collected below Tank 1 at eight feet below ground surface (bgs), contained DRO up to 10,000 mg/kg. Two soil samples collected below the Tank 2 excavation at 12 feet bgs contained DRO up to 510 mg/kg. Adjacent to Tank 2, two soil samples collected from petroleum impacted soil below the dispenser islands at a depth of 4 feet bgs, contained DRO up to 27,000 mg/kg. Both tank excavations were backfilled with clean fill.

To further evaluate extent of soil contamination, six soil borings were advanced at the former USTs and former dispenser island in 2003. A total of 18 soil samples were collected from the borings at depths ranging from 10 to 20 feet bgs. One soil sample collected at the former dispenser island at 10 feet bgs contained DRO up to 2,410 mg/kg. The remaining samples did not contain contaminants above cleanup levels. Groundwater was encountered at 7 to 9 feet bgs.

In 2003 five additional soil borings were advanced on the adjacent contaminated site to evaluate potential offsite migration of contaminants. They were completed as monitoring wells P8, P9, P13, P14, and P15, and sampled. Eight soil samples collected from the soil borings at 10 and 15 feet bgs did not exceed the most conservative ADEC cleanup levels. Groundwater was encountered at 8 to 12 feet bgs. One groundwater sample collected from monitoring well P8 located 100 feet south of the former dispenser island contained benzene at 0.008 mg/L. No other groundwater samples exceeded Table C cleanup levels.

In 2003 and 2004, contaminated soil was excavated to a depth of 9 to 12 feet bgs at the former USTs and associated dispenser island. Approximately 2,650 cubic yards of contaminated soil were removed and transported off site for thermal remediation at an approved facility. A total of 18 confirmation samples were collected at a depth of 9 to 12 feet bgs from both excavations, and did not contain contaminants above the most conservative ADEC cleanup levels. The excavations were backfilled with clean fill.

Groundwater sampling was conducted in 2004 and 2005. Contaminants above cleanup levels were found only at monitoring well P14, which contained DRO up to 3.01 mg/l in the 2004 sample.

In December 2005, a soil boring was advanced adjacent to P14, and completed as monitoring well P16 to evaluate the extent of DRO contamination in this area. Two soil samples collected from 10 to 17 feet bgs did not contain contaminants above cleanup levels. Groundwater samples collected from the new well and from the various existing monitoring wells at the site from 2005 to 2007 did not

contain contaminants above cleanup levels. The only monitoring well remaining on the property (P13) was decommissioned in 2007 in accordance with ADEC guidance.

In 2009, two soil borings were advanced downgradient of the property. One borehole was completed as monitoring well NW-1. Soil samples collected from 5 to 10 feet bgs contained DRO up to 617 mg/kg, and benzene up to 0.0358 mg/kg. A groundwater sample collected from NW-1 did not contain contaminants above Table C cleanup levels.

As of 2011, the six monitoring wells (P8, P9, P14, P15, P16 and NW- 1) which were installed to delineate downgradient groundwater, will be retained for future monitoring. These monitoring wells are located on the adjacent property, and are being tracked in the CSP database under the site known as Tesoro - Petro Products (formerly Renner's Gas & Save), Hazard ID 23361.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants were 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, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Table 1 – Exposure Tracking Model Results

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contaminated surface soil was removed and thermally remediated.
Sub-Surface Soil Contact	De Minimis Exposure	Confirmation sub-surface soil samples were below direct contact cleanup levels and de minimis in volume. Therefore risk via this pathway is insignificant.
Inhalation – Outdoor Air	De Minimis Exposure	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and benzene; and de minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	The remaining soil contaminant concentrations are below inhalation cleanup levels for DRO, and benzene; covered with clean fill; and de minimis in volume. Therefore risk via this pathway is considered insignificant.

Groundwater Ingestion	De Minimis Exposure	The source area and contaminated soil have been removed. Remaining soil contamination is considered de minimis. The latest four groundwater sampling events, from 2005 to 2009, did not contain contaminants above ADEC cleanup levels. Risk via this pathway is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	Source areas are located more than 100 feet from surface water and surface water is not utilized as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals. This area is not used for harvesting wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at this site.

Notes to Table 1: “De-minimis exposure” means that in ADEC’s judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

The cleanup actions to date have served to adequately address petroleum contaminated soil from the site. Based on the information available, ADEC has determined no further assessment and/or cleanup action is required. There is no unacceptable risk to human health or the environment, and this site will be designated as 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), and 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 closure 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.

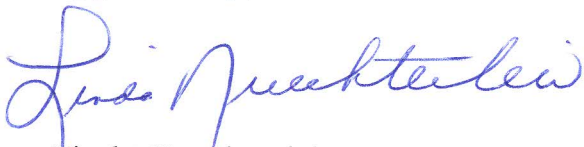
Appeal

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, Grant Lidren at (907) 269-8685.

Approved By,



Linda Nuechterlein
Environmental Manager

Recommended By,



Grant Lidren
Environmental Specialist

cc: Jeff Petrivich, Petro Products
James Cazort, Take Two