SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 2265.26.035

January 19, 2012

Anastasia E. Duarte, RS
Retail Environmental Remediation Administrator
Tesoro Refining and Marketing Company
3450 South 344th Way, Suite 100
Auburn, WA 98001-5931

Re: ADEC Decision Document; Tesoro Northstore #65 - 2011
Corrective Action Complete Determination

Dear Ms. Duarte:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the former Tesoro Northstore #65 - 2011 site, located at 2700 South Knik-Goose Bay Road, in Wasilla, Alaska. 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 at this time.

This decision is based on the administrative record for this site, which is located in the offices of the ADEC in Soldotna, 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 this Corrective Action Complete determination.

Introduction

Site Name and Location:
Tesoro Northstore #65 - 2011
2700 South Knik - Goose Bay Road
Wasilla, Alaska

Name and Mailing Address of Contact Party:
Anastasia E. Duarte, RS
Retail Environmental Remediation Administrator
Tesoro Refining and Marketing Company
3450 South 344th Way, Suite 100
Auburn, WA 98001-5931

Name and Mailing Address of Land Owner:
Tesoro Alaska Company
L B Walker & Associated Incorporated
13111 Northwest Freeway #125
Houston, TX 77040-6321

ADEC Site Identifiers
Reckey: 2011220025201
File: 2265.26.035
Hazard ID: 25727

Regulatory authority under which the site is being cleaned up:
18 AAC 75 and 18 AAC 78

Background
This site has been impacted by automotive fuels from leaks and/or spills associated with one 26,000-gallon compartmentalized underground storage tank (UST) and associated piping and dispenser systems. This UST reportedly contained gasoline and diesel product during the history of use from 1994 to 2011. Soil samples collected at this site have been tested for: gasoline range organics (GRO), diesel range organics (DRO), benzene, toluene, ethylbenzene, and xylene (BTEX), and polynuclear aromatic hydrocarbons (PAH).

Site Characterization and Cleanup Actions
During maintenance work done in 1990 to install overfill containment and line detectors, a limited fuel release was encountered from former UST systems consisting of three individual USTs; one 10,000-gallon unleaded gasoline, one 10,000-gallon supreme unleaded gasoline and one 5,000-gallon diesel. Contaminated soil was excavated and stockpiled on site in a lined storage area. On August 3rd and 4th of 1994 these three USTs and their associated piping and dispenser systems were removed. Approximately 300 cubic yards of contaminated soil was removed from the site and transported to Clean Soils, Incorporated for thermal remediation and disposal. On May 2, 1995 ADEC issued a no further remedial action determination for the site.

In 1994, one 26,000-gallon compartmentalized UST was installed that contained diesel and gasoline fuels. The UST and associated fuel dispensing piping and dispenser systems were removed from the site on September 9, 2011, at which time a total of 21 tons of contaminated soil was excavated and transported offsite to Alaska Soil Recycling for thermal treatment and disposal. Additional soil assessment of the UST excavation and dispenser islands and piping assembly identified one area of benzene soil contamination in the excavation bottom at 16 feet below ground surface at 0.195 mg/kg. To ensure that the on-site drinking water well was not impacted by any contamination, a water sample was collected and tested. No analytes were detected. The on-site drinking water well is installed at a depth of 80 feet, and the adjacent properties are largely served by private water and sewer systems.

Groundwater was not encountered during the UST excavation activities. Groundwater was estimated to be at a depth of 72 feet below ground surface.

Residual benzene concentrations in subsurface soil at this site exceeded ADEC's Method Two 'Migration to Groundwater' soil cleanup levels within the former UST location at 16 feet below ground surface, at the time of the UST removal.

Contaminant of Concern
During the investigations at this site, soil samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), benzene, toluene, ethylbenzene, and xylenes (BTEX) and polynuclear aromatic hydrocarbons (PAH). Based on these analyses, the following Contaminant of Concern remained in subsurface soil at the time of the UST system closure:

- Benzene

Cleanup Levels
The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B1, Migration to Groundwater.

Contaminant	Site Cleanup Level (mg/kg)
• Benzene	0.025

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 1.

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	The contaminated soil has been removed and transported off-site for thermal remediation and disposal. Surface soils meet ADEC's ingestion soil cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Contamination remains in the subsurface, but is well below direct contact cleanup levels. Subsurface soils meet ADEC's ingestion soil cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination remains in the subsurface, but is well below ADEC outdoor inhalation soil cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	There is a building at the site, however residual soil contaminant levels should pose no unacceptable risk to indoor air quality.

Groundwater Ingestion	Pathway Incomplete	No groundwater contamination was encountered at the site. Groundwater has not been impacted, based on the information reported to ADEC.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	No exposure to ecological receptors is possible unless subsurface soils are excavated and relocated/transported offsite.

Notes to Table 1: "De-minimis exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal mass of remaining contamination. "Pathway Incomplete" means that in ADEC's judgment contamination has no potential to contact receptors.

ADEC Decision

The cleanup actions to date have served to excavate and adequately remove contaminated soil from the site. Contamination remains on site in subsurface soil above an established default soil cleanup level, however ADEC has determined there is no unacceptable risk to human health or the environment. Therefore, we are issuing this Corrective Action Complete determination, subject to the following condition:

1. The most current soil sample analytical data reported benzene contamination exceeding the applicable soil cleanup levels, within the former underground storage tank location. Any proposal to excavate, transport, move, treat, and/or dispose of residual contaminated soil at this "site" requires ADEC approval. This is consistent with the requirements of 18 AAC 78.274(b), and 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status to 'Cleanup Complete', and will include a description of the contamination remaining at the site.

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

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. The Tesoro Refining and Marketing Company would remain liable for any additional assessment and/or cleanup action(s), should ADEC impose such a requirement.

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 Corrective Action Complete decision, or any other aspect of this project, you may phone me at (907) 262-3422, or contact me via e-mail at paul.horwath@alaska.gov

Sincerely,

Paul Horwath

Paul Horwath, P.E.
Environmental Engineer

Cc: Robert Gilfilian, P.E., MWH, Anchorage
Michael Zidek, MWH, Anchorage