

STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

555 Cordova Street
Anchorage, AK 99501-2617
Phone: (907) 269-7658
Fax: (907) 269-7649
<http://www.state.ak.us/dec/>

File Number: 2100.38.198

January 28, 2008

Dave Hultquist
Hultquist Homes
351 E. 104th Ave
Suite 100
Anchorage, AK 99515

RE: **Site Closure and Record of Decision (ROD)**
for Former Quality Fabrication site, 360 East 100th Avenue, Anchorage, Alaska
ADEC Database Record no. 1998210120501)¹

Dear Mr. Hultquist:

The Department of Environmental Conservation, Contaminated Sites Program (ADEC) reviewed the file for 360 East 100th Avenue and has determined that soil and groundwater at the site meet ADEC cleanup levels for soil under 18 AAC 75.341 Method 2 Tables B1 and B2, and for groundwater under 18 AAC 75.345, Table C. Site closure is granted based on the information summarized below.

Background:

The site is contained within a rectangular 4.95 acre lot that fronts 100th Avenue. The property is zoned I-2 for heavy industrial use and has the legal description of Tract 1B Maui Industrial Park Subdivision, Anchorage, Alaska. The property was reportedly used as an unauthorized landfill for silt, peat and other construction waste, later covered by unspecified fill, from before 1972 until as late as 1983.² The property was developed in 1984-85 with the construction of an 18,000 square foot warehouse that has six service bays and two office wings (Figure 2).³ The property was used as a truck maintenance facility before 1991 at which time Quality Fabrication, Inc. (QFI) purchased the property. QFI performed heavy steel fabrication until its bankruptcy in 1997, when Northrim Bank took possession of the property.

1991 surface spill, cleanup and Phase II site assessment:

¹ The ADEC Contaminated Sites Program online database search page address is currently http://www.dec.state.ak.us/spar/csp/db_search.htm. The current location of the hard copy files is the ADEC office at the return address above.

² February 1992 "Phase II Environmental Assessment, 360 East 100th Avenue" prepared by JMM.

³ Attached Figures 2 and 3 are found in the July 1998 "Spill Response/Phase II Investigation" report by ESL.

Contamination was first reported to ADEC on August 30, 1991 following a 200-gallon gasoline spill that day from an on site aboveground storage tank when a chain holding the tank while it was being moved to a paved area slipped, and the tank fell over. The spill location is only described as southwest of the single building on the property. Although the exact spill location is not shown on a figure or otherwise described in file documents, it appears to have occurred within the area immediately adjacent to the southwestern portion of the building shown on attached Figure 2. Although the southern portion of the property is described as being lined, and the spill report notes that the spill took place at a location that was lined at a depth of three feet below the ground surface, a July 1998 report by ESL describes the material as geotextile fabric present at a depth of 12-18 inches below the ground surface in soil around the building. The type of fabric and depth of placement are clearly visible in photographs found in the 1998 report.

Approximately 15 cubic yards of contaminated soil was excavated and stockpiled on a liner. In November 1991, R&M Consultants collected two samples from the stockpile with respective results of 9.48 mg/kg and 30.46 mg/kg total BTEX (i.e., benzene, toluene, ethylbenzene and xylene constituents), with no detectable benzene in either sample, and volatile petroleum hydrocarbon (VPH)⁴ levels of 23.4 mg/kg and 65.8 mg/kg. ADEC staff granted site closure in a letter dated February 20, 1992 and allowed the stockpiled soil to be spread on site.

During December 1991 and January 1992, James M. Montgomery (JMM) conducted a phase two environmental assessment on behalf of owner Quality Fabrication Inc. to evaluate potential contaminant sources at the site that were reportedly identified in a 1990 report done for FDIC, the former property owner. The Phase I report was apparently not submitted to ADEC and is not in the ADEC file or in the possession of the current owner.

JMM's work was reported in the "Phase II Environmental Assessment" dated February 27, 1992. Potential contaminant sources and hazardous substances were investigated by JMM including ten floor sumps within the warehouse, seven of which were accessible and several of which contained petroleum hydrocarbon products; drums containing various substances that were stored at the site; and petroleum-hydrocarbon stained soil outside of the warehouse. The report documents that JMM sampled the contents of drums and properly disposed of them.

The 1991-1992 JMM assessment also included collecting and analyzing soil samples from the ground surface and near-ground surface; excavating test pits; and drilling three test holes to groundwater, encountered at approximately 12 feet below the ground surface (bgs). A water sample was collected from one of the borings and analyzed by EPA Method 8240, with results of no detected contaminants. No contaminants above cleanup levels were present in the soil samples collected during the JMM investigation. However, the report noted that the floor drains in the warehouse "appear to be connected to the Municipality of Anchorage sewer system."

⁴ VPH refers to EPA Method 8015 Modified, a method for determining gasoline range organics (GRO) concentrations required by ADEC after August 21, 1991 and that corresponds to the currently required method AK 101 analysis for GRO. Both VPH and AK 101 measure petroleum hydrocarbon ranges corresponding to an alkane range of C₆-C₁₀.

1998 site assessment and cleanup of Areas 1 and 2:

Following Quality Fabrication's bankruptcy in the mid-1990s the property was repossessed by Northrim Bank. In 1998 environmental consultant ESL, LLC (ESL) conducted a Phase I environmental audit and Phase II site assessments on behalf of Northrim Bank in anticipation of marketing the property for resale. ESL submitted two reports titled "Phase I Environmental Site Assessment" dated May 1998 (May 1998 Phase I report) and "Spill Response/Phase II Site Investigation" dated July 1998 (July 1998 Spill Response/Phase II report).

The May 1998 Phase I report noted that the floor drains present in the warehouse "are blind sumps, apparently not plumbed to city sewer" but also included the observation that "One possible drain line from grease pit" (pg. 11 of May 1998 report). Figures 9 and 10 of the report identify the north grease pit as a sump with a five-inch cast iron pipe exiting from the west wall. Section 5.4.2 of the report states that "A drainpipe with an unknown purpose and termination was discovered in one of the grease pits, implying the potential for an onsite septic or drainfield system." According to the report, no known residential or private wells are present within 1/2 mile downgradient of the site. The Phase I report identified fuel contaminated soil south of and adjacent to the building over what was then estimated to encompass a 1,900 square foot area. The contamination was attributed to property use by a neighboring business during winter-spring 1997-1998 for parking and servicing heavy equipment. During the next phase of work, this area was designated Area 1 and the areal extent of contamination was revised to 1,600 square feet.

Based on the Phase I report, Northrim Bank authorized ESL to conduct additional cleanup during June 1998. The July 1998 Spill Response/Phase II report documented the removal of sludge and fluids from what were described as ten blind sumps within the building at the site, and documented the excavation and stockpiling of an estimated 110 cubic yards of petroleum contaminated soil from two areas identified on attached Figures 2 and 3 (from the Phase II report) as **Area 1** and **Area 2**.

Area 1 is described as a parking pad adjacent to the south end of the shop building. The "spill response" of the July 1998 report title refers to the cleanup of this area, as the contamination in the area was attributed to recent site use and releases. The report describes the origin of the contamination as "drips from leaking hydraulic and engine oil systems, draining of contaminated fuel and crankcase oil, etc., resulted in stains over an approximately 20 by 80 ft area." Soil samples collected in situ and from the stockpile after excavation were sampled, and analyses found mixtures of uncontaminated lubricating oil and diesel fuel. Priority metals found in the samples were consistent with background values in Anchorage area mineral soils, and no halogenated compounds were found in the samples in concentrations above method detection limits.

Approximately 75 cubic yards of soil was excavated from Area 1 in early June 1998, with additional excavation and final confirmation sampling done on July 14, 1998 to the maximum depth described only as "4+" feet bgs in the July 1998 report. The soil was stockpiled at the site until removal to Anchorage Soil Recycling (ASR) for thermal treatment in August 1998. Maximum contaminant levels documented in investigative test pits prior to cleanup of Area 1

were 2,000 mg/Kg diesel range organics (DRO) and 18,000 mg/Kg residual range organics (RRO). Following excavation all compounds of concern were below the cleanup levels applicable in 1998 and the current site cleanup levels, with maximum confirmation sample results of 1.5 mg/Kg GRO; 89 mg/Kg DRO and 320 mg/Kg RRO.

Area 2 was the asphalt-paved location of a fuel-contaminated zone adjacent to and beneath a former diesel and gasoline aboveground tank storage area, and was identified in the 1992 JMM report as an area that should be further investigated based on soil boring results showing contaminant levels that were elevated but did not exceed cleanup levels. The asphalt paving was removed to facilitate 1998 investigation and cleanup activities. A characterization sample collected from investigative Test Pit 4 at the most contaminated portion of the impacted area contained 1,600 mg/Kg gasoline range organics (GRO) and 1,000 mg/Kg DRO, with no residual range hydrocarbons (RRO). The maximum BTEX analytical result prior to excavation was 471 mg/Kg, with benzene not detected. The analytical results were consistent with diesel and gasoline product spills.

Approximately 35 cubic yards of soil was excavated from Area 2 in June 1998 and stockpiled until removal to Anchorage Soil Recycling (ASR) for thermal treatment in August 1998. Following excavation all compounds of concern were below the cleanup levels applicable in 1998 and the current 18 AAC 75.341 site cleanup levels. The maximum excavation and sample depth in Area 2 was 14 feet bgs, with the sample collected from the 14-foot depth taken approximately 1.5 feet below the soil/groundwater interface according to the field notes corresponding to sample number 61098-4 appended to the July 1998 report. Contaminant levels in the saturated soil sample from 14 feet bgs were well below applicable cleanup levels, with BTEX at 1.0 mg/Kg with benzene not detected and GRO at 28 mg/Kg as the only contaminants remaining above detection limits. Additionally, contaminant concentrations in four samples collected from 9.5 to 11 feet bgs in Area 2 did not exceed applicable cleanup levels. Approval to transport and thermally treat soil at ASR was granted by ADEC in a letter dated August 5, 1998.

The July 1998 report included a request that ADEC grant site closure. ADEC declined to grant site closure in a letter dated October 7, 1998, requesting additional investigation based on the fact that the shallow groundwater may have been impacted and the floor drains as potential contaminant sources had not been fully evaluated. The additional investigation was not done, and Northrim sold the property.

ADEC Decision

In granting site closure, the Department reviewed the basis for requiring additional soil and groundwater investigation as communicated in ADEC's letter dated October 7, 1998. ADEC determined that the request for additional investigation should be treated as a suggestion and not a requirement. Although it is prudent to investigate all potential contaminant sources, ADEC found the concern of potential contamination from the floor drains to be mitigated by the fact that confirmation sample results document remaining contaminant levels are well below applicable cleanup levels. Additionally, in Area 1, approximately eight feet of soil is present between the bottom of the excavation and the soil/groundwater interface. In Area 2, the excavation extended approximately 1.5 feet below the soil/groundwater interface to a maximum

depth of 14 feet as noted above, and contaminant levels in soil above and below the groundwater table were well below applicable cleanup levels.

The applicable site cleanup levels for soil are the Method Two default groundwater migration levels found in Table B1 and B2 of 18 AAC 75.341, Soil Cleanup Levels; Tables.⁵ The applicable site cleanup levels for groundwater are found in 18 AAC 75.345, Table C.

Cost Recovery

Please note that ADEC is required by Alaska Statutes 46.04.020; 46.03.822; and 46.08.070 to recover costs associated with regulatory oversight associated with hazardous substance releases. Expenses for which we must seek reimbursement include staff time associated with general or technical assistance, workplan review, project oversight, administrative overhead, general project management, legal services, interest, travel, equipment and supplies, and ADEC contractor costs, if any.

Appeal

This decision is subject to appeal as follows: 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. 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.

In conclusion, the Department has determined that the site closure is warranted based on the information above. No further environmental investigation or other actions are required for this site unless, in the future, contamination is found that exceeds the cleanup level or is determined by ADEC to pose an unacceptable risk to public health, safety or the environment. In that case, additional work may be required in accordance with applicable environmental regulations. This determination will be documented in the Department's Contaminated Sites database.

⁵ "18 AAC 75 Oil and Other Hazardous Substances Pollution Control, As amended through December 30, 2006." Note that the requirements of 18 AAC 75.325 - 18 AAC 75.390 are referred to as the "site cleanup rules".

Dave Hulquist

6

January 28, 2008

If you have any questions concerns regarding this decision, please contact Eileen Olson at (907) 269-7527 or by e-mail at Eileen.Olson@alaska.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Sundet". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Rich Sundet
Environmental Manager

Attachments: Figures 2 and 3 from July 1998 Phase II report

cc: Eileen Olson, ADEC CSP/Anchorage
Dan Young, TERRASAT

TRACT 1A
MAUI INDUSTRIAL
PARK SUBD.

ALASKA PETROLEUM
CONTRACTORS

TRACT 1B
MAUI INDUSTRIAL
PARK SUBD.

TRACT 1C
MAUI INDUSTRIAL
PARK SUBD.

ENTECH, INC.

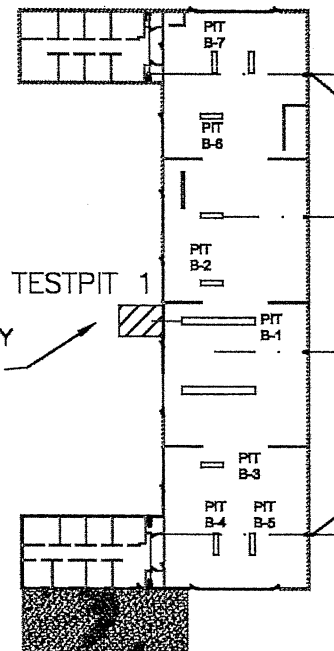
SOIL BORINGS BY
JMM, 1991

SB-1

TESTPIT 2

SB-2

TESTPIT 3



TESTPIT 1

TEST PITS BY
ESL, 1998

SB-3

TESTPITS 4,5,6

AREA 2:
FUEL
PLUME REMNANT

AREA 1:
WASTE OIL / FUEL
SURFACE SPILLS / STAINS

TRACT 10, MAUI INDUSTRIAL PARK SUBD.



ESL, LLC

2950 WESTWIND CT
ANCHORAGE, ALASKA 99516

NORTHTRIM BANK

360 100th AVENUE INVESTIGATION

SCALE: 1" = 60'

FIGURE

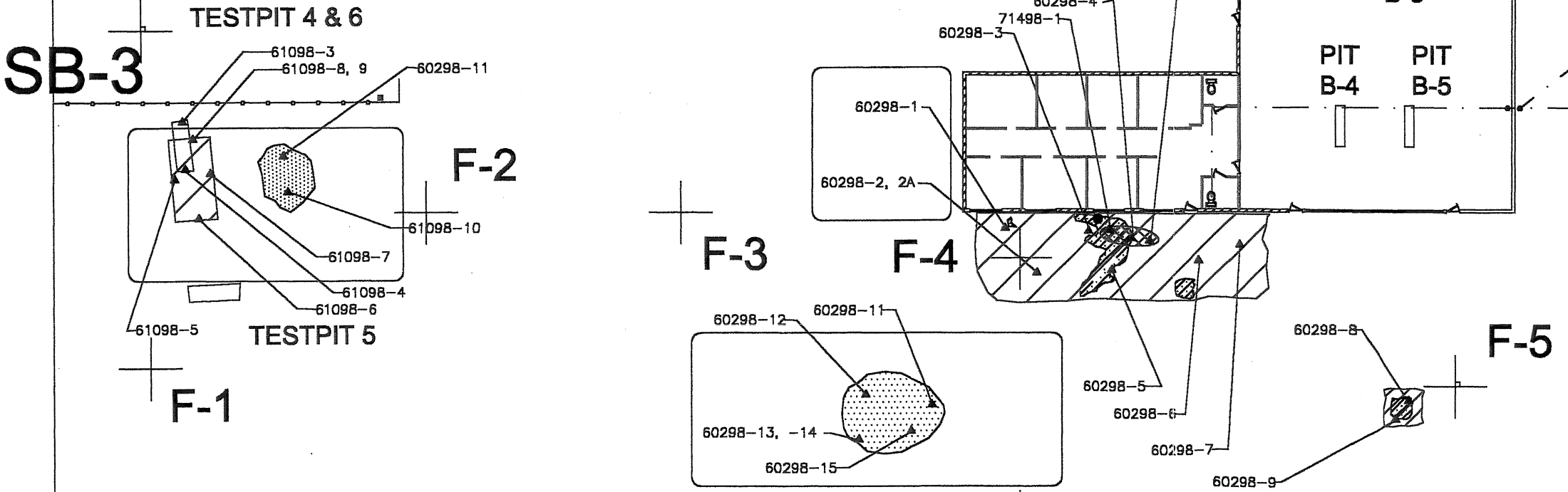
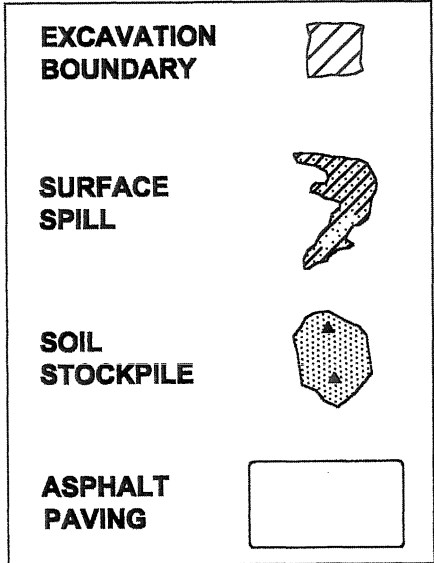
2

TABLE 1: ANALYTICAL RESULTS

SAMPLE	LOCATION	DEPTH (FT)	BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	RRO (mg/kg)	HVO (mg/kg)	AS	BA	CA	CR	PB	SE	AG
60298-1	OIL SPILL EXCAVATION	1.5	BDL	1.1	BDL	40	BDL	BDL	69	BDL	27	6.8	5.6	BDL
60298-2	OIL SPILL EXCAVATION	1.5	BDL	1.5	38	300	BDL	BDL	48	BDL	18	3.7	BDL	BDL
60298-2A	DUPLICATE OF SAMPLE 60298-2	1.5	BDL	NT	NT	NT	BDL	BDL	31	BDL	17	3.1	BDL	BDL
60298-3	OIL SPILL EXCAVATION	2.0	BDL	1.3	22	130	BDL	BDL	41	BDL	25	7.7	BDL	BDL
60298-4	OIL SPILL EXCAVATION	3.0	0.03	1.4	2000	18000	BDL	BDL	60	BDL	34	6.3	BDL	BDL
60298-5	OIL SPILL EXCAVATION	2.0	0	1.6	53	320	BDL	BDL	80	BDL	84	6.8	BDL	BDL
60298-6	OIL SPILL EXCAVATION	1.5	BDL	1.6	BDL	65	BDL	BDL	66	BDL	25	4.7	BDL	BDL
60298-7	OIL SPILL EXCAVATION	1.5	0	2.2	32	190	BDL	6.8	57	BDL	23	6.3	BDL	BDL
60298-8	FUEL STAIN EXCAVATION	1.5	NT	NT	45	190	BDL	NT	NT	NT	NT	NT	NT	NT
60298-9	FUEL STAIN EXCAVATION	1.5	NT	NT	39	140	BDL	NT	NT	NT	NT	NT	NT	NT
60298-10	TEST PIT 1	5.0	NT	NT	BDL	1000	BDL	NT	NT	NT	NT	NT	NT	NT
60298-11	STOCKPILE 1 NORTH	NA	1	29	200	830	BDL	6.4	72	BDL	40	20	BDL	BDL
60298-12	STOCKPILE 1 WEST	NA	0.266	4.8	200	920	BDL	5.7	54	BDL	26	21	BDL	BDL
60298-13	STOCKPILE 1 SOUTH	NA	1	29	250	1200	BDL	5.5	54	BDL	26	13	BDL	BDL
60298-14	DUPLICATE OF SAMPLE 60298-13	NA	0.564	29	480	3200	BDL	BDL	56	BDL	29	16	BDL	BDL
60298-15	STOCKPILE 1 EAST	NA	0	2.1	63	310	BDL	6.5	57	BDL	30	16	BDL	BDL
61098-1	TEST PIT 2	5.0	NT	NT	28	340	NT	NT	NT	NT	NT	NT	NT	NT
61098-2	TEST PIT 3	8.0	NT	NT	BDL	BDL	NT	NT	NT	NT	NT	NT	NT	NT
61098-3	TEST PIT 4	4.0	471	1600	1000	BDL	NT	NT	NT	NT	NT	NT	NT	NT
61098-4	TEST PIT 4,5,6 EXCAVATION: BOTTOM	14.0	1	28	BDL	BDL	BDL	NT	NT	NT	NT	NT	NT	NT
61098-5	TEST PIT 4,5,6 EXCAVATION: WEST WALL	9.0	BDL	BDL	BDL	BDL	BDL	NT	NT	NT	NT	NT	NT	NT
61098-6	TEST PIT 4,5,6 EXCAVATION: SOUTH WALL	11.0	0	1.4	BDL	BDL	BDL	NT	NT	NT	NT	NT	NT	NT
61098-7	TEST PIT 4,5,6 EXCAVATION: EAST WALL	9.5	0.647	2.5	BDL	BDL	BDL	NT	NT	NT	NT	NT	NT	NT
61098-8	TEST PIT 4,5,6 EXCAVATION: NORTH WALL	10.0	0	1.8	BDL	61	BDL	NT	NT	NT	NT	NT	NT	NT
61098-9	DUPLICATE OF SAMPLE 61098-8	10.0	0.259	3.5	13	91	BDL	NT	NT	NT	NT	NT	NT	NT
61098-10	STOCKPILE 2 SOUTH	NA	2	7.6	BDL	BDL	NT	NT	NT	NT	NT	NT	NT	NT
61098-11	STOCKPILE 2 NORTH	NA	BDL	1.2	BDL	BDL	NT	NT	NT	NT	NT	NT	NT	NT
71498-1	OIL SPILL EXCAVATION 2	3.0	BDL	BDL	56	250	NT	NT	NT	NT	NT	NT	NT	NT
71498-2	OIL SPILL EXCAVATION 2	3.0	BDL	1.5	89.0	320	NT	NT	NT	NT	NT	NT	NT	NT
71498-3	DUPLICATE OF SAMPLE 71498-2	3.0	NT	NT	130.0	NT	NT	NT	NT	NT	NT	NT	NT	NT

BDL = Below method detection limit
NT = Sample not analyzed for these compounds

KEY



ESL, LLC
2950 WESTWIND CT
ANCHORAGE, ALASKA 99516

NORTHRIM BANK

360 E. 100th AVENUE FACILITY INVESTIGATION

**CONTAMINANT INVESTIGATION:
SAMPLE LOCATIONS AND RESULTS**

SCALE: 1" = 20'

FIGURE

3