THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File: 2100.26.021

October 30, 2014

Mr. Bruce Anthony
Environmental Director
Holiday Companies
4567 American Blvd. West
Bloomington, MN 55437

Re: Decision Document; Holiday Station Store #606/Former Williams Express Station #5006
Corrective Action Complete Determination-Institutional Controls

Dear Mr. Anthony;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Holiday Station Store #606/Former Williams Express Station #5006 site located in Anchorage, 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 as long as the site is in compliance with established institutional controls.

This decision is based on the administrative record for Holiday Station Store #606/Former Williams Express Station #5006, which is located in the offices of the 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 with ICs determination.

Introduction

Site Name and Location:
Holiday Station Store #606/Former Williams Express Station #5006
1501 Abbott Road
Anchorage, Alaska

Name and Mailing Address of Contact Parties:
Mr. Bruce Anthony
Environmental Director
Holiday Companies
4567 American Blvd. West
Bloomington, MN 55437

Sandhill Investments, LLC
c/o Florence M. Stebbins
PO Box 932
Homer, AK 99603-0932

ADEC Site Identifiers
File: 2100.26.021
Hazard ID: 23847

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

Background
This site has been used as a retail fueling station since 1972 and was operated by Toppers Oil Corporation, Mapco Express Inc, Williams, and most recently Holiday Companies which currently operates an active fueling station at the site.

Eight underground fuel storage tanks (USTs) have been located at the site, the first two were installed in 1972 and removed in 1985. These UST were located in what is now the Abbot Road right-of-way and were replaced with three USTs that were installed in the eastern portion of the property. These three USTs were removed in 1997 and were replaced with the three USTs currently in use at the site in the northwestern portion of the property: a 20,000-gallon gasoline UST, a 15,000-gallon gasoline UST and a 10,000-gallon diesel UST (Attachment B).

The property is owned by Sandhill Investments LLC and leased to Holiday Companies. A drinking water well was present along the northern border of the property but has been abandoned.

Contaminants of Concern
During the investigations at this site, soil and groundwater samples were analyzed for diesel range organics (DRO), residual range organics (RRO), gasoline range organics, (GRO), volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX), polychlorinated biphenyls (PCBs), pesticides, and metals. Based on these analyses and knowledge of the source area, the following Contaminants of Concern were detected above cleanup levels in soil groundwater:

- DRO
- GRO
- Benzene
- Toluene
- Ethylbenzene
- Xylenes

Cleanup Levels
Soil cleanup levels for this site are established in 18 AAC 75.341, Tables B1 and B2:

Contaminant	Site Cleanup Level (mg/kg)
DRO	250
GRO	300
Benzene	0.025

• Toluene	6.5
• Ethylbenzene	6.9
• Xylenes	63

Groundwater cleanup levels for this site are established in 18 AAC 75.345, Table C.

Contaminant	Site Cleanup Level (mg/l)
• DRO	1.5
• GRO	2.2
• Benzene	0.005
• Toluene	1.0
• Ethylbenzene	0.7
• Xylenes	10

Site Characterization and Cleanup Activities

Petroleum contamination was first noted at the site in 1987. Soil samples collected from boreholes contained benzene up to 2.9 mg/kg. Soil samples collected in 1990 contained total petroleum hydrocarbons (TPH) up to 2,608 mg/kg and groundwater samples contained benzene up to 62.5 mg/l. The operator at the time, MAPCO, entered into a Compliance Order by Consent with ADEC in 1991 that addressed investigation and cleanup at a number of MAPCO stations including this one. A soil vapor extraction system was installed at the site in 1993 to remediate petroleum contamination and the system was operated until 1997 when it was removed during the construction of the new fueling station.

Prior to the construction of a new fueling station, a pre-construction investigation was conducted in May 1997. Soil samples collected from test pits excavated to a depth of approximately 14 feet below ground surface (bgs) contained DRO up to 638 mg/kg and GRO up to 2,237 mg/kg with the highest concentrations associated with a layer of peat at 5 feet bgs. Contamination was also identified in the southern-central portion of the property in the vicinity of the former Toppers dispenser islands (Attachment B). Approximately 1,400 cubic yards (cy) of petroleum contaminated soil was removed from this area as part of site grading activities and thermally treated at Anchorage Soil Recycling (ASR). Confirmation samples collected from the bottom and sidewalls of this excavation indicated DRO, GRO, and BTEX remained at concentrations above cleanup levels.

In July 1997, the three 12,000-gallon USTs used by Toppers/MAPCO were removed from a common excavation in the eastern-central portion of the property along with 1,500 cy of contaminated soil which was taken to ASR for thermal treatment. Confirmation soil samples collected after the tanks were removed contained benzene up to 9.54 mg/kg in a sample from 12 feet below ground surface (bgs). A sample collected from 22 feet bgs contained benzene at 2.62 mg/kg. An additional 900 cy of contaminated soil was excavated during the removal of the dispenser islands and piping and treated at ASR. Confirmation samples collected six feet bgs at the dispenser/piping area also contained GRO and BTEX above cleanup levels.

In an effort to remediate petroleum contaminated soil and groundwater, seven vapor extraction lines and six air injection wells were installed in the vicinity of the former USTs and dispensers prior to the completion of the new fueling station. The vapor extraction/air injection system (VEAIS) was targeted to areas exhibiting high levels of petroleum vapors.

The new fueling station was completed in 1997 and included a 20,000-gallon gasoline UST, a 15,000-gallon gasoline UST and a 10,000-gallon diesel UST that were installed in the western-central portion of the property, a dispenser island and canopy with eight dispensers between the building and Abbott Road to the south and two pump islands located near the new USTs.

Periodic groundwater monitoring had been conducted at the site since the early 1990's when groundwater flow was determined to be in a southwesterly direction. By 2000, the monitoring well network consisted of four monitoring points that were installed with the remediation system in 1997; MP-1, MP-2, MP-3, MP-4, existing well MW-9 and a new well MW-5. Other monitoring wells in place prior to 1997 were destroyed or decommissioned during construction of the new station. In an effort to monitor contaminant trends and delineate the extent of groundwater contamination, additional monitoring wells were installed in 2001, 2005, 2008, and 2013. Groundwater monitoring was conducted on a biannual basis and typically included the collection of groundwater samples from six to twelve wells located both onsite and offsite. The greatest concentrations of contaminants in groundwater were generally located near the original Toppers dispensers along the southern edge of the property. This area was covered by pavement in the mid 1990's when Abbot Road was widened and therefore was not directly targeted by the remediation system installed in 1997.

The two monitoring wells near the former dispensers, B12MW and B16MW have exhibited the highest concentrations of DRO, GRO, and benzene above Table C cleanup levels at various times since they were installed in 2001 and 2005 respectively. Concentrations of each of these contaminants have demonstrated stable or decreasing trends between 2005 and 2013. Because the contamination was located along the southern property boundary, delineation of the extent of groundwater impacts was difficult due to the presence of Abbott Road and improvements to the Seward Highway on- and off-ramps. In 2008 Holiday installed monitoring well B17MW downgradient of the site near the Seward Highway. In 2013, Holiday received approval to install a monitoring well across Abbot Road adjacent to a wetland area, B18MW, in order to evaluate the downgradient extent of groundwater contamination. Groundwater samples collected from these wells did not contain contaminants above cleanup levels. Another downgradient well located in the southwest corner of the property, MW-9, was sampled in 2005, then again between 2010 and 2013 and never contained contaminants above cleanup levels.

The VEAIS operated in various configurations from 1998 until 2005. Vapor recovery had decreased significantly by 2005 and several of the vapor extraction lines had become submerged. Rebound testing conducted in the following years indicated contaminant concentrations in the most contaminated wells, B12MW and B16MW were more influenced by groundwater levels than by operation of the system. The aboveground components of the remediation system were decommissioned in 2013 followed by the air injection wells which were decommissioned in 2014 along with the remaining monitoring wells at the site.

To confirm that the there was no exposure via the drinking water pathway, two drinking water wells located on the property to the north of HSS 606 were sampled in 2010. Neither sample contained detectable concentrations of contaminants and data from the wells indicated they were completed in a confined aquifer approximately 87 feet below ground surface.

Additional site investigation information is available at the DEC Contaminated Sites Program office in Anchorage under file #2100.26.021.

Cumulative Risk Calculation

Pursuant to 18 AAC 78.600(d), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a

cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative non-carcinogenic risk standard at a hazard index of one across all exposure pathways.

Cumulative risk at this site was calculated assuming a residential land use and using the highest detected concentrations of contaminants in all of the groundwater samples collected in 2012 and in soil samples collected during the removal of the USTs in 1997. It should be noted that the soil data used to calculate cumulative risk was collected in 1997 from an area that was then directly targeted by the VEAIS, so it is unlikely that these contaminants remain in the same concentrations as in 1997. This area is now occupied by underground utilities and surface improvements that made it impractical to re-evaluate contaminant concentrations in soil following the operation of the VEAIS.

The cumulative risk calculation indicates a cumulative carcinogenic cancer risk of 5 in 1,000 and a non-carcinogenic hazard index of 5. The potential cumulative risk is via the drinking water pathway, assuming that benzene contaminated groundwater was used as a drinking water source. This pathway is controlled by the institutional controls that prohibit the use of groundwater for drinking water at this site and the contamination in groundwater is limited to a discreet along the southern border of the property and beneath the Abbott Road right-of-way.

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, Exposure Controlled, 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	De minimis exposure	Contaminated soil was removed from the surface during construction of the new fueling station, which is completely paved, eliminating exposure to potentially contaminated surface soil
Sub-Surface Soil Contact	De minimis exposure	The facility is an active fueling station and is paved. A Notice of Environmental Contamination will be placed on the property notifying future property owners of the presence of contamination.
Inhalation – Outdoor Air	De minimis exposure	Operation of the VEAIS was effective at removing vapors from the subsurface
Inhalation – Indoor Air (vapor intrusion)	De minimis exposure	Operation of the VEAIS was effective at removing vapors from the subsurface and the building is approximately 100 feet from areas of groundwater contamination
Groundwater Ingestion	De minimis exposure	Existing wells are upgradient, have not been impacted by contamination from the site, and an institutional control will prohibit the installation of drinking water wells onsite without ADEC approval.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in this area.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.

Exposure to Ecological Receptors	Pathway Incomplete	Ecological receptors are not likely to come into contact with subsurface contamination remaining at the 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

Contamination remains on site above established default cleanup levels, however ADEC has determined there is no unacceptable risk to human health or the environment. Therefore this site will be issued a Cleanup Complete- ICs determination subject to the following.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Holiday Companies or their designee shall report to ADEC every five years to document land use, or as soon as they become aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.**

2. A Notice of Environmental Contamination (Attachment C) will be recorded at the Alaska Department of Natural Resources Recorders Office indicating that contamination remains at the site above default cleanup levels and detailing the Institutional Controls in place at the site.

3. Installation of groundwater wells will require prior approval from the ADEC Contaminated Sites Program

4. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 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. (See attached site figure.)

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

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Cleanup Complete determination, Institutional Controls will be terminated.

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.

Please sign and return *Attachment A* to ADEC <u>within 30 days of receipt of this letter</u>. If you have questions about this closure decision, please contact the ADEC project manager, Bill O'Connell at (907) 269-3057.

Approved By,

Bill O'Connell
Environmental Program Manager

Attachment A: Cleanup Complete-ICs Agreement Signature Pages
Attachment B: Site Figures
Attachment C: Notice of Environmental Contamination

*Attachment A: Cleanup Complete-ICs Agreement and Signature Page**

Holiday Companies agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision Document dated **October 30, 2014** for Holiday Station Store #606. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 78.276(f).

_____

Signature of Authorized Representative, Title, Organization

_____

Signature of Authorized Representative, Title, Organization

Note to Responsible Person (RP):
After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

ADEC File No.	2100.26.021
Hazard ID:	23847
ADEC Project Manager:	Bill O'Connell

For Internal Use Only

***Attention ADEC Administration Staff:** Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan *and* Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

*Attachment A: Cleanup Complete-ICs Agreement and Signature Page**

Sandhill Investments LLC agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision Document dated **October 30, 2014** for Holiday Station Store #606. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 78.276(f).

_____

Signature of Authorized Representative, Title, Organization

_____

Signature of Authorized Representative, Title, Organization

Note to Responsible Person (RP):
After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

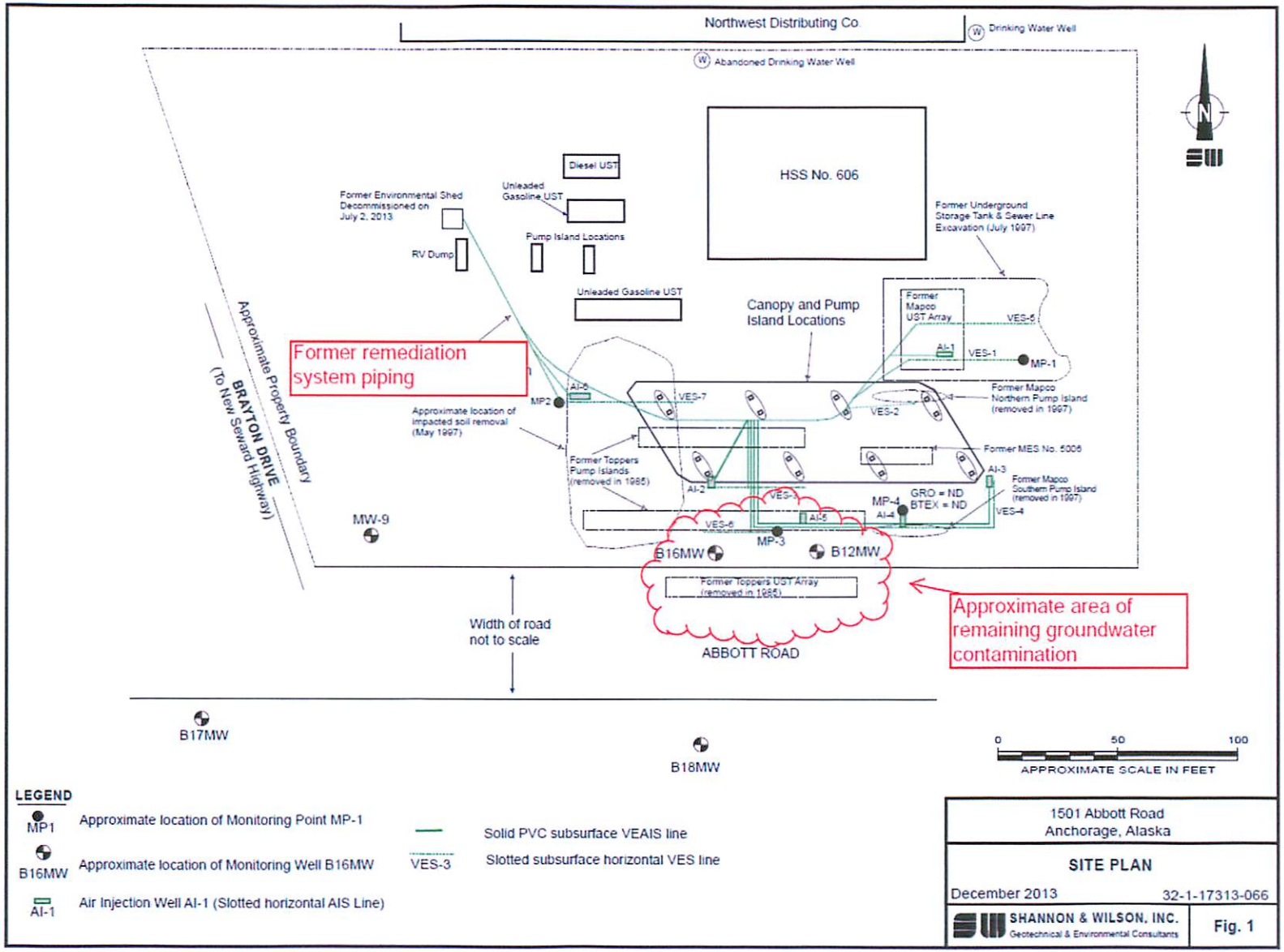
ADEC File No.	2100.26.021
Hazard ID:	23847
ADEC Project Manager:	Bill O'Connell

For Internal Use Only

***Attention ADEC Administration Staff:** Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan *and* Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

Attachment B- Site Figure



Attachment C- Notice of Environmental Contamination

DRAFT ONLY- DO NOT FILE

NOTICE OF ENVIRONMENTAL CONTAMINATION

As required by the Alaska Department of Environmental Conservation (ADEC), Grantor, pursuant to 18 AAC 75.375, Holiday Companies and Sandhill Investments, LLC, Grantees, as the owners and/or operators of the subject properties, hereby provide public notice that the property located at:

- Lot 1, NACLA subdivision, Plat #72-288

with street address 1501 Abbott Road, Anchorage, Alaska has been subject to a discharge or release of oil or other hazardous substances, regulated under 18 AAC 75, Article 3, as amended April 8, 2012. This release and cleanup are documented in the ADEC contaminated sites database at http://dec.alaska.gov/applications/spar/CSPSearch/default.asp under Hazard ID number 23847.

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment. ADEC determined, in accordance with 18 AAC 75.325 – 390 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though residual petroleum contamination in soil exists on-site.

Attached is a site survey or diagram drawn to scale that shows the property boundaries and the approximate extent of petroleum contamination in groundwater. This site is subject to the following institutional controls:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Holiday Companies or their designee shall report to ADEC every five years to document land use, or as soon as they become aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.**

2. Installation of groundwater well will require prior approval from the ADEC Contaminated Sites Program

3. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 75.325 (i). 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. (See attached site figure.)

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

In the event that information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator are required under 18 AAC 75.300 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 75.325-.390.

Pursuant to 18 AAC 75.325(i)(1) and (2), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to the cleanup rules found at 18 AAC 75.325-.370. At this site, in the future, if soil is removed from the site it must be characterized and managed following regulations applicable at that time.

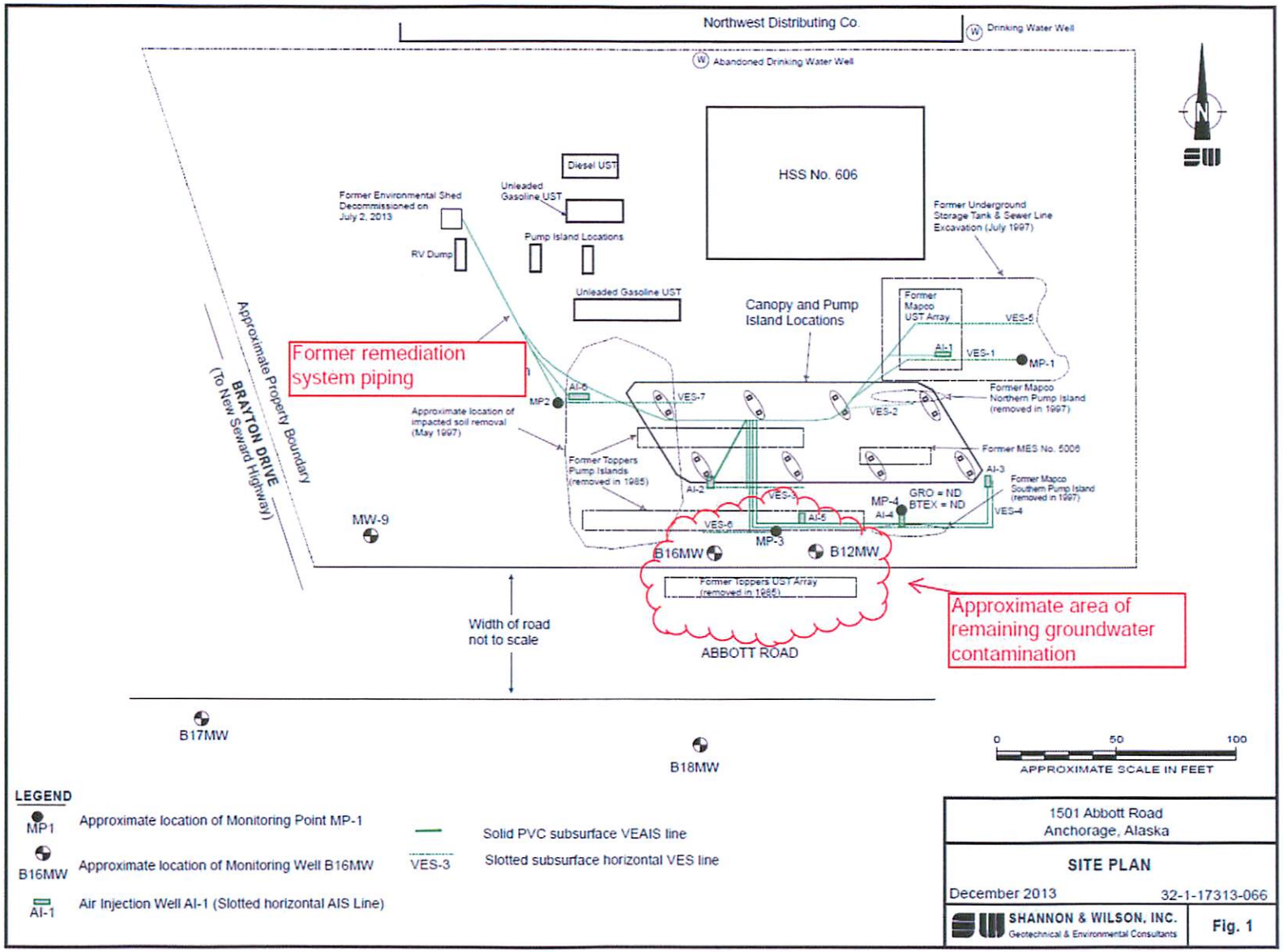
This NEC remains in effect until a written determination from ADEC is recorded that states that soil and groundwater at the site have been shown to meet the most stringent cleanup levels in 18 AAC 75 and that off-site transportation of soil is not a concern.

For more information on the contaminated site in this Notice of Environmental Contamination, please see ADEC Contaminated Sites Program file number 2100.26.021 for the site named Holiday Station Store #606, former Williams Express Store #5006

_____ _____

Signature of Authorized ADEC Representative Date

Site Figure


Northwest Distributing Co.
Drinking Water Well
Abandoned Drinking Water Well
HSS No. 606
Diesel UST
Unleaded Gasoline UST
Former Environmental Shed Decommissioned on July 2, 2013
RV Dump
Pump Island Locations
Unleaded Gasoline UST
Former Underground Storage Tank & Sewer Line Excavation (July 1997)
Canopy and Pump Island Locations
Former Mapco UST Array
VES-5
AI-1
VES-1
MP-1
Former remediation system piping
AI-6
MP2
VES-7
VES-2
Former Mapco Northern Pump Island (removed in 1997)
Approximate location of impacted soil removal (May 1997)
Former Toppers Pump Islands (removed in 1985)
Former MES No. 5006
AI-2
VES-3
AI-3
Former Mapco Southern Pump Island (removed in 1997)
MP-4
GRO = ND
BTEX = ND
AI-4
AI-5
VES-4
VES-6
MP-3
MW-9
B16MW
B12MW
Former Toppers UST Array (removed in 1985)
Approximate area of remaining groundwater contamination
Approximate Property Boundary
BRAYTON DRIVE
(To New Seward Highway)
Width of road not to scale
ABBOTT ROAD
B17MW
B18MW
0
50
100
APPROXIMATE SCALE IN FEET
LEGEND
MP1
Approximate location of Monitoring Point MP-1
B16MW
Approximate location of Monitoring Well B16MW
AI-1
Air Injection Well AI-1 (Slotted horizontal AIS Line)
Solid PVC subsurface VEAIS line
VES-3
Slotted subsurface horizontal VES line
1501 Abbott Road
Anchorage, Alaska
SITE PLAN
December 2013
32-1-17313-066
SHANNON & WILSON, INC.
Geotechnical & Environmental Consultants
Fig. 1