



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No: 2100.26.172

August 5, 2015

Kurt Adler
A&A The Shop
4617 Old Seward Highway
Anchorage, Alaska 99503

Re: Decision Document: Harold's Rent-A-Truck Corrective Action Complete Determination

Dear Mr. Adler:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the Harold's Rent-A-Truck site. 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 this site will be closed. This decision is based on the administrative record for the Harold's Rent-A-Truck site, which is located in the offices of the ADEC in Anchorage, Alaska. No further remedial action is required.

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 Cleanup Complete determination.

Site Name and Location:

Harold's Rent-A-Truck
4617 Old Seward Highway
Anchorage, AK 99503

Name and Mailing Address of Contact Party:

Mr. Kurt Adler
MICAN, LLC
4617 Old Seward Highway
Anchorage, AK 99503

DEC Site Identifiers:

File No: 2100.26.172
Hazard ID: 24586

Regulatory Authority for Determination:

18 AAC 75 and 18 AAC 78

Site Description and Background

The Harold's Rent-A-Truck site is located at 4617 Old Seward Highway in Anchorage, Alaska. The site is located in a primarily commercial area, and is bordered by East 46th Court to the north, Old Seward Highway to the west, and commercial properties to the east and south. A drinking water well (DWW) is present on the property and is used for potable water. This well is drilled to approximately 80 feet deep,

is within a confined aquifer, and is fitted with a submersible pump. Other commercial properties in the area also utilize DWWs.

Two 4,500-gallon gasoline underground storage tanks (USTs) were installed at the 4617 Old Seward Highway property (the location of the former business named Harold's Rent-A-Truck) in 1974. A letter from the ADEC UST Program, dated December 29, 1992 stated that both USTs needed to be upgraded to meet new performance standards or be replaced by December 22, 1998. Both tanks were removed in November of 1996.

Contaminants of Concern

During the investigations at this site, soil and groundwater samples were analyzed for one or more of the following: gasoline range organics (GRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), as well as lead. Benzene was the only compound present in soil and groundwater above ADEC cleanup levels.

Cleanup Levels

Default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2, Migration-to-Groundwater (MTG) for the under 40-inch zone. Default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C.

Table 1 – ADEC Cleanup Levels

Contaminant	Soil Cleanup Level – MTG (mg/kg)	Soil – Maximum Remaining Concentrations (mg/kg)	Groundwater Cleanup Level (mg/L)	Groundwater – Maximum Remaining Concentrations (mg/L)
GRO	300	8.1	2.2	ND
Benzene	0.025	0.053	0.005	ND
Toluene	6.5	0.62	1.0	0.00046
Ethylbenzene	6.9	0.24	0.7	0.00080
Xylenes	63	1.5	10.0	0.0039
Lead	NA	11	0.015	NS

mg/kg = milligrams per kilogram

mg/L = milligrams per liter

bolded = result exceeds Method Two soil cleanup levels

MTG = migration to groundwater

GRO = gasoline range organics

ND = not detected above laboratory limit of quantitation

NA = not applicable

NS = not sampled

Characterization and Cleanup Activities

Two 4,500-gallon gasoline USTs were removed from the site in November 1996. Both USTs were documented as single-walled steel tanks. Immediately following removal, an inspection of the tanks did not reveal any apparent pitting or leaking; however, loose fittings were noted on the vent and fill pipes. A petroleum odor was noted during removal activities, and as such, excavation commenced to remove the impacted soil. Excavation continued to the maximum extent practicable, and was limited vertically by groundwater at about 12 feet below ground surface (bgs). Roughly 100 cubic yards (cy) of impacted soil

was removed and temporarily stockpiled about 400 feet east of the excavation. Four confirmation soil samples were collected from the excavation and were analyzed for GRO, BTEX, and lead. Analytical results revealed that a maximum concentration of 0.053 milligrams per kilogram (mg/kg) benzene remained at the base of the excavation. All other compounds were not detected above laboratory detection limits or were detected below ADEC cleanup levels.

A groundwater monitoring well (Monitoring Well MW-1) was installed just south of the source area in September 1998 to better evaluate the potential impacts to groundwater. The well was sampled a total of four times (see Table 2 for sampling results), and was decommissioned July 23, 2015.

Table 2 – Monitoring Well MW-1 Sampling Results

Contaminant	Sept. 11, 1998	Sept. 25, 1998	Sept. 27, 2002	April 10, 2015	Cleanup Levels
GRO	0.21	0.27	NS	ND	2.2 mg/L
Benzene	0.0138	0.0290	0.0071	ND	0.005 mg/L
Toluene	0.00790	0.00519	0.00730	0.00046	1.0 mg/L
Ethylbenzene	0.00474	0.00844	0.018	0.00080	0.7 mg/L
Xylenes	0.0593	0.0359	0.13	0.0039	10 mg/L

mg/L = milligrams per liter

bolded = result exceeds groundwater cleanup levels

NS = not sampled

ND = not detected above laboratory limit of quantitation

GRO = gasoline range organics

The onsite DWW was sampled once in September 1998; no compounds were detected above the laboratory detection limits during the DWW sampling event.

In July 2015, five soil samples were collected from the soil stockpile that was generated during the 1996 removal action. The samples were submitted for analysis of GRO and BTEX; all sample results were below ADEC cleanup levels. The stockpile is currently land-spread on an industrial lot (roughly 400 feet west of the former USTs), and ranges between 8 and 12 inches thick. A birch tree was observed growing out of the southern end of the pile during sampling.

Cumulative Risk Evaluation

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 noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

Exposure 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 3.

Table 3 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is below direct contact and ingestion cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Soil contamination is at least 10 feet bgs and is not beneath the onsite structure based on excavation confirmation results.
Groundwater Ingestion	De-Minimis Exposure	Contamination remains in the groundwater, but is below applicable groundwater cleanup levels. Extent of soil contamination above MTG cleanup levels can be considered de minimis.
Surface Water Ingestion	Pathway Incomplete	Surface water is not contaminated and is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Site is paved; foraging or subsistence activities unlikely.
Exposure to Ecological Receptors	Pathway Incomplete	No terrestrial or aquatic exposure routes present.

Notes to Table 3: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be affected by the minimal volume or concentration 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

This site will receive a “Closed” designation on the Contaminated Sites Database, subject to the following standard conditions.

1. 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.
2. 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.

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 99811-1800, 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 99811-1800, 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 closure decision, please feel free to contact me at (907) 269-7691.



Joshua Barsis
Project Manager

cc: Henry Busse