



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

410 Willoughby Ave., Suite 303
P.O. Box 111800
Juneau, Alaska 99811-1800
Main: 907.465.5390
Fax: 907.465.5218
www.dec.alaska.gov

File: 2100.26.557

Certified Mail, Return Receipt Requested
Article No.: 7015 1660 0000 0542 5482

November 27, 2015

Bruce Anthony
Environmental Director
Holiday Alaska, Inc.
4567 American Boulevard West
Minneapolis, MN 55437

Re: Institutional Controls verification for Holiday Station Store #611

The Contaminated Sites Program conducts periodic verification of closed sites where institutional controls (land use restrictions) are required under 18 AAC 75.375. We have identified Holiday Station Store #611 as a site with institutional controls.

In order to prevent people from being exposed to any remaining contamination on the property, this letter is being sent as a reminder of the conditions placed on the property as part of the 2010 Corrective Action Complete Determination-Institutional Controls granted by the Alaska Department of Environmental Conservation (ADEC). At the time of closure, soil and groundwater contamination was documented as remaining on the property. The 2010 determination is subject to the following site-specific conditions and/or controls:

- Any future change in land use may impact the exposure assumptions cited in the Corrective Action Complete-Institutional Controls document. If land use or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore Holiday Alaska, Inc. shall report to ADEC every five years to document land use, or report as soon as Holiday Alaska, Inc. becomes aware of any change in land ownership or use, if earlier. The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.
- Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
- 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.

- Soil contamination is remaining in the area of the active tank array. When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
- Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

In addition to the conditions above, you are required to notify the ADEC if there are any changes in land use or ownership. Failure to maintain these requirements may result in re-opening the site by the Contaminated Sites Program, in which case, further remediation could be mandatory.

In accordance with 18 AAC 75.380(d)(2), ADEC may require additional site assessment, monitoring, remediation, and/or necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

If you seek to have the institutional controls removed from this site, you can choose at any time to voluntarily conduct additional assessment, monitoring or further cleanup to demonstrate that contamination at the site now meets the applicable cleanup levels under 18 AAC 75.

This site information is a matter of public record and is available at ADEC's online database record at:
<http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/25217>

If you have any questions regarding this site, please contact me at (907) 465-5229 or evonne.reese@alaska.gov and I will be glad to assist you.

Sincerely,



for Evonne Reese
Environmental Program Specialist
Institutional Control Unit

Enclosure: 2010 Corrective Action Complete-Institutional Controls

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-7526
FAX: (907) 269-7649
www.dec.state.ak.us

File: 2100.26.557

Return Receipt Requested

Article No: 7008 1830 0002 6349 4791

August 19, 2010

Bruce Anthony
Environmental Director
Holiday Alaska, Inc.
4567 American Boulevard West
Minneapolis, Minnesota 55437

Re: Decision Document;
Holiday Station Store #611
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 #611 located at 1530 Huffman Road in Anchorage. 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 the Holiday Station Store #611 located at 1530 Huffman Road in Anchorage. 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 Institutional Controls (ICs) determination.

Introduction

Site Name and Location:

Holiday Station Store #611 located at 1530 Huffman Road in Anchorage
1530 Huffman Road
Anchorage, Alaska 99515

Name and Mailing Address of Contact Party:

Bruce Anthony
Environmental Director
Holiday Alaska, Inc.
4567 American Boulevard West
Minneapolis, Minnesota 55437



ADEC Site Identifiers

File: 2100.26.557

Hazard ID: 25217

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

Background

During a repair to tank overfill containment basins, hydrocarbon-impacted soil was encountered, removed, and containerized in two drums during the summer of 2008. A sample was collected from the drum with the highest PID reading. This result, which represented contaminated soil removed, showed benzene, toluene, ethylbenzene, and xylenes (BTEX), gasoline range organics (GRO), and diesel range organics (DRO) above Method Two Migration to Groundwater. ADEC sent a letter on February 13, 2009 requesting that a release investigation be conducted.

Soil samples collected at this site have been tested for BTEX, GRO, and DRO. Groundwater samples collected at the site have been tested for BTEX.

Site Characterization and Cleanup Actions

In June 2009, Shannon & Wilson conducted a release investigation on behalf of Holiday Alaska, Inc. Twelve hand borings were advanced and six soil samples and one duplicate were collected and analyzed. Two of these samples contained benzene above Method Two Migration to Groundwater up to 0.0478 mg/kg.

Based on the results of these samples, another boring was advanced. A temporary well was also installed and then removed after it was sampled. There were no exceedances of Method Two or Table C in these samples.

Contaminants of Concern

- Benzene

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2 Under 40 inch Zone, Migration to Groundwater.

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

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

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
• Benzene	0.005

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	The removal action is presumed to have removed contaminated surface soil; therefore, the extent remaining at the surface is considered de minimis in volume.
Sub-Surface Soil Contact	De-minimis exposure	The removal action served to remove the majority of contaminated soil, and any remaining contaminant concentrations in the subsurface are well below direct contact cleanup levels.
Inhalation – Outdoor Air	De-minimis exposure	The remaining soil contaminant concentrations are well below the inhalation levels for benzene and no other volatile compounds are present at levels exceeding any applicable criteria. Therefore, the contamination remaining is considered de minimis in extent.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	The remaining soil contaminant concentrations are well below the inhalation levels for benzene and no other volatile compounds are present at levels exceeding any applicable criteria. Therefore, the contamination remaining is considered de minimis in extent.
Groundwater Ingestion	De-minimis exposure	No exceedance of Table C in groundwater in the most recent samples collected.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	Site is a paved commercial facility and contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	There is no evidence of ecological impacts resulting from contamination associated with this site. Exposure route are not present.

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 ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Corrective Action 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 Alaska, Inc. shall report to ADEC every five years to document land use, or report as soon as Holiday Alaska, Inc. becomes 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 (deed notice) shall be recorded in the State Recorder's Office that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document.
3. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
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 and Notice of Environmental Contamination)
5. Soil contamination is remaining in the area of the active tank array (see attachment B). When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
6. 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 Corrective Action Complete determination, then the 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.

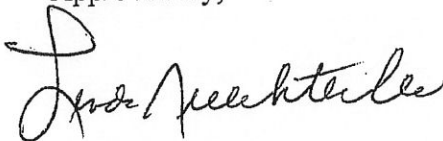
Appeal

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 within 30 days of receipt of this letter. If you have questions about this closure decision, please contact the ADEC project manager, Keather McLoone at (907) 269-7526.

Approved By,



Linda Nuechterlein

Recommended By,



Keather McLoone

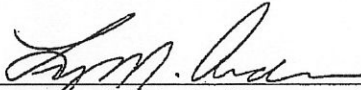
Attachment A: Corrective Action Complete-ICs Agreement Signature Page

Attachment B: Notice of Environmental Contamination and Site Figures.

Cc: Jessica Busey, Shannon & Wilson

Attachment A: Corrective Action Complete-ICs Agreement - Signature Page*

Holiday Alaska, Inc. agrees to the terms of this Corrective Action Complete with ICs determination as stated in this Closure Decision Document **dated August 19, 2010** for the Holiday Station Store #611 site, Hazard ID: 25217. 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 18 AAC 78.276(f).



Signature of Authorized Representative, Title
Holiday Alaska, Inc.

Lynn M. Anderson, Assistant Secretary

Printed Name of Authorized Representative, Title
Holiday Alaska, Inc.

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, Keather McLoone at the address on this correspondence within 30 days of receipt of this letter.

ADEC File No.	2100.26.557
Hazard ID:	25217
ADEC Project Manager:	Keather McLoone

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: Notice of Environmental Contamination and Site Figures

Find Attachment B on the following pages

NOTICE OF ENVIRONMENTAL CONTAMINATION

Recording District: Anchorage
Official State Business – No Charge

As required by the Alaska Department of Environmental Conservation (ADEC), Grantee, pursuant to 18 AAC 78.625 Holiday Alaska, Inc., Grantor, as the owner and operator of the subject property, hereby provides public notice that the property known as Holiday Station Store #611 located at 1530 Huffman, Anchorage, Alaska, 99516, and more particularly described as follows:

Beacon Park Block 2 Lot 1A,

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 78, as amended October 2006. This release and cleanup are documented in the ADEC contaminated sites database at http://www.dec.state.ak.us/spar/csp/db_search.htm under Hazard ID number 25217.

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 78.090 - 276 corrective action rules, that site cleanup has been performed to the maximum extent practicable even though residual benzene contaminant remaining in soil exists on-site. Further details are available in the attached closure letter.

Attached is a site diagram that shows locations of existing structures, the approximate location and extent of remaining soil contamination, the locations where confirmation soil samples were collected, and the location of the temporary monitoring well that was installed.

The closure decision issued by ADEC is 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 Alaska, Inc. shall report to ADEC every five years to document land use, or report as soon as Holiday Alaska, Inc. becomes 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. This Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document.
3. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
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 and Notice of Environmental Contamination)
5. Soil contamination is remaining in the area of the active tank array (see attachment B). When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

If other 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 78.220 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 78, Article 2.

In the future, if soil is removed from the site or groundwater is brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time. Pursuant to 18 AAC 78.274 (b), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to 18 AAC 78, Article 2.

This notice remains in effect until a written determination from ADEC is recorded that states that soil at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and that off-site transportation of soil and/or groundwater is not a concern.

Please return original copy of this notice to the address below:

Signature: _____ (landowner)

Printed Name: _____

Mailing Address: _____

(Notarization seal)

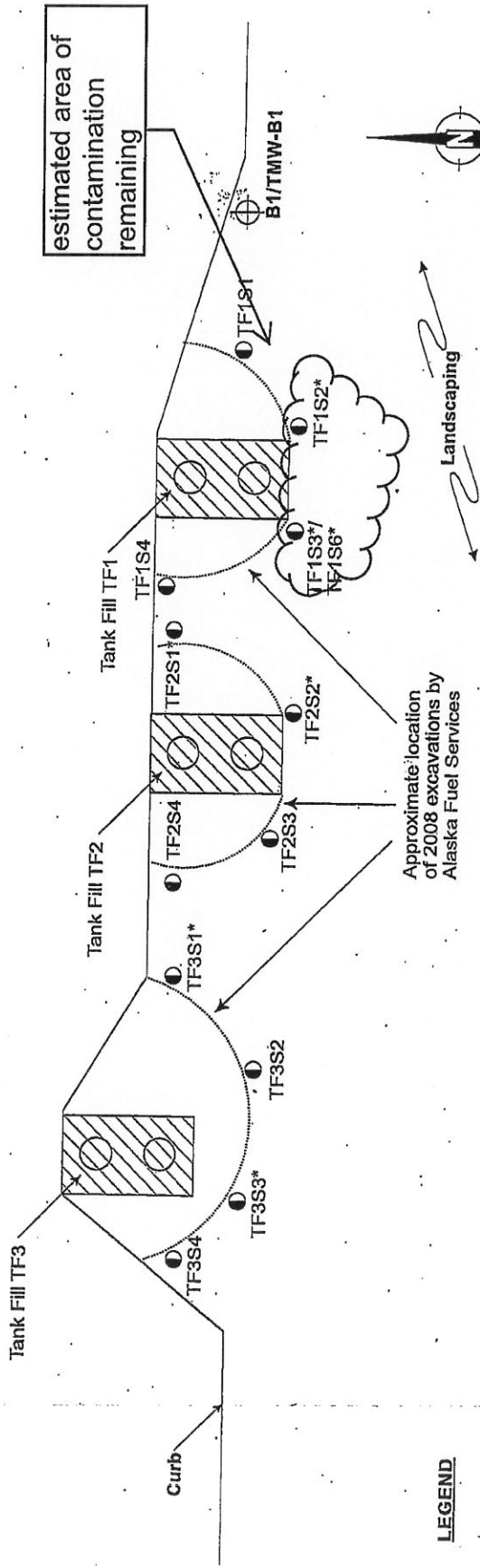
Subscribed and sworn to before me this ____ day of
_____, 20__.

Notary Public in and for the State of _____
My commission expires: _____

Note: Please refer to 11 AAC 05.010 (a)(14) for the required fee. The information requested on this form should be typed or legibly printed in English. Any attachments or exhibits must not exceed 8.5" x 14". This form is intended to comply with the recording requirements of AS 40.17.030 and 11 AAC 06.040, please double-check recording requirements.

revised 3/19/10

Canopy (approximately 10 feet further north)



LEGEND

- TF1S1 Approximate location of hand boring/Sample TF1S1, advanced/collected by Shannon & Wilson on June 5 or June 8, 2009.
- TF1S2* Approximate location of analytical sample exceeding ADEC Method 2 Cleanup Level for benzene (see Table 2 for analytical results).
- * Indicates analytical sample submitted for laboratory testing.
- ⊕ R4/TMW-B1 Approximate location of Soil Boring B1 and Temporary Monitoring Well TMW-B1.

1530 Huffman Road
Anchorage, Alaska

DETAIL EN SITE DI AN