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: 2100.26.588

Return Receipt Requested
Article No.: 7016 1370 0000 0242 0694

August 10, 2016

Mr. Matthew Thiel, Chief Financial Officer
Hickel Investment Company
939 W. 5th Avenue
Anchorage, AK 99501-1700

Re: Decision Document: Commercial Property – 619 East 5th Avenue UST #2.
Corrective Action Complete Determination

Dear Mr. Thiel:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the Commercial Property – 619 East 5th Ave underground storage tank (UST #2) site located in Anchorage, Alaska. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

This decision is based on the administrative record for the Commercial Property – 619 East 5th Ave UST #2 site, 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 determination.

Site Name and Location:
Commercial Property – 619 East 5th Ave
619 East 5th Ave
Anchorage, AK, 99518

Name and Mailing Address of Contact Party:
Mr. Matthew Thiel
Hickel Investment Company
939 W. 5th Ave.
Anchorage, AK, 99501-1700

DEC Site Identifiers:
File No: 2100.26.588
Hazard ID: 26338

Regulatory Authority for Determination:
18 AAC 75 and 18 AAC 78

Site Description and Background

The subject UST was a 1000-gallon single wall cylindrical steel tank installed in 1957. The tank was buried approximately 7 feet below ground surface (bgs). Petroleum contamination in soil was encountered directly beneath the tank during the October 2014 tank removal.

This site is co-located with another site known as commercial property – 619 East 5th Avenue. For information regarding the investigation and cleanup of that site, please see ADEC file #2100.38.551.

Contaminants of Concern

During the course of the investigations at this site, soil and groundwater samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), PAHs and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses, the following contaminants of concern were identified in surface soil.

- Diesel Range Organics (DRO)
- Gasoline Range Organics (GRO)
- Toluene
- Ethylbenzene
- Xylenes

Cleanup Levels

Alternative migration-to-groundwater cleanup levels have been established for contaminants detected above the default migration to groundwater cleanup levels as follows:

- Diesel Range Organics (DRO)- 2720 mg/kg

Sufficient site characterization has been completed and the Contaminated Sites Program has determined through the review of site specific analytical data that as of 2016, the contaminant concentrations remaining in soil have achieved steady-state equilibrium and are not resulting in the contamination of groundwater at the site.

Characterization and Cleanup Activities

In October 2014 a 1000-gallon gasoline underground storage tank (UST #2) and its associated piping were removed from the commercial property at 619 E. 5th Avenue. No holes were observed in the tank during excavation. Approximately 80 cubic yards of excavated soil were generated during the removal of the UST and temporarily placed in a stockpile. Confirmation samples collected from the base and sides of the excavation contained GRO up to 2080 mg/kg, toluene up to 14.6 mg/kg, ethylbenzene up to 41.4 mg/kg and xylenes up to 613 mg/kg which exceed the applicable ADEC cleanup levels.

In November 2014 field personnel returned to the site to remove the potentially impacted soils beneath UST #2. The excavation was advanced up to 15 feet bgs and the soil was segregated into two stockpiles based on photoionization detector (PID) measurements. Soil samples collected from each of the two stockpiles did not contain target analytes above ADEC cleanup levels. Confirmation samples collected from the UST excavation bottom and sidewalls, also did not contain target analytes exceeding ADEC cleanup

levels, suggesting the contaminants detected during the initial UST excavation were de-minimis in extent. The UST was transported offsite for disposal and the excavated soil was placed back into the excavation.

In June 2015 seven soil borings were advanced to evaluate the extent of contamination at this and the adjacent site noted above (ADEC File # 2100.38.551). The soil boring at the former location of UST #2 contained DRO up to 2,720 mg/kg, however the deeper sample from this same boring did not contain detectable concentrations of contaminants.

To evaluate the potential migration of contaminants to groundwater, three groundwater monitoring wells were installed in November 2015. One of the wells was installed near the former location of UST #2. Groundwater samples were collected from the three wells in December 2015 and again in June 2016. On both occasions none of the analytes tested for were detected in the groundwater samples. The monitoring wells were decommissioned in accordance with ADEC guidance in 2016.

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 most recently detected concentrations of contaminants in all of the soil samples collected in 2015.

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, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contamination was not detected in surface soil (0-2 feet bgs)
Sub-Surface Soil Contact	Pathway Incomplete	Contamination is not present in sub-surface soil (2 to 15 feet below ground surface)
Inhalation – Outdoor Air	De-Minimis Exposure	Contaminant concentrations in soil are below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Volatile contaminants capable of causing risk via this pathway are not present at the site.
Groundwater Ingestion	De-Minimis Exposure	Although contamination was present in soil at the groundwater interface, contamination was not detected in groundwater samples collected at the site

Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Ecological receptors are not likely to come into contact with groundwater contamination remaining at the site.

Notes to Table 2: "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

Soil and groundwater contamination at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This site will receive a "Cleanup Complete" designation on the Contaminated Sites Database, subject to the following standard conditions.

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 78.995 (134)] 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 contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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 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) 269-3059, or email at darren.mulkey@alaska.gov.

Sincerely,

Darren Mulkey
Environmental Program Specialist