



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of  
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

555 Cordova Street  
Anchorage, Alaska 99501  
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[www.dec.alaska.gov](http://www.dec.alaska.gov)

File: 2100.26.316

Certified Mail, Return Receipt Requested  
Article No. 7016 1370 0000 0242 1356

September 7, 2016

Bob Cloud  
Wells Fargo Bank  
MAC K3200-018  
6831 Arctic Boulevard  
Anchorage, AK 99518

Re: Institutional Controls verification for Former National Bank of Alaska located at 1500 West Benson Boulevard, Anchorage, AK 99503

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 Former National Bank of Alaska - Benson 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 2011 Corrective Action Complete - Institutional Controls granted by the Alaska Department of Environmental Conservation (ADEC). At the time of closure, soil contamination was documented as remaining on the property. The contamination was discovered during the removal of a 700 gallon diesel underground storage tank. The removal of impacted soil was limited by the presence of the building.

The 2011 determination is subject to the following site-specific and standard conditions and/or controls:

1. Any future change in land use may impact exposure assumptions cited in the Corrective Action Complete-Institutional Controls Determination document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore Wells Fargo Bank shall report to ADEC every five years 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](mailto:DEC.ICUnit@alaska.gov).
2. Once the contaminated soil remaining beneath the building becomes accessible, it must be evaluated in accordance with an ADEC approved work plan.
3. 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. This is a standard condition.

4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. This is a standard condition.
5. Groundwater in the state of Alaska is protected for aquaculture use. In the event that an aquaculture facility uses groundwater from this site in the future, additional treatment may be required to meet aquatic life criteria under 18 AAC 70. This is a standard condition.

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/23108>

If you have any questions regarding this site, please contact me at (907) 269-3083 or [nathan.maxwell@alaska.gov](mailto:nathan.maxwell@alaska.gov) and I will be glad to assist you.

Sincerely,



Nathan Maxwell  
Environmental Program Technician  
Institutional Control Unit

Enclosure: 2011 Corrective Action Complete-Institutional Controls Determination



# 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  
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www.dec.state.ak.us

File No: 2100.26.316  
Certified Return Receipt  
Article No: 7010 2780 0000 2178 4605

May 12, 2011

Bob Cloud  
Wells Fargo Bank  
MAC K3200-018  
6831 Arctic Blvd.  
Anchorage, AK 99518

Re: Decision Document; Former National Bank of Alaska-Benson  
Corrective Action Complete -Institutional Controls Determination

Dear Mr. Cloud:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with National Bank of Alaska-Benson, located at 1500 West Benson Blvd. 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 (ICs).

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

National Bank of Alaska-Benson  
1500 West Benson Blvd  
Anchorage, Alaska

Name and Mailing Address of Contact Party:

Mr. Bob Cloud  
Wells Fargo Bank  
MAC K3200-018  
6831 Arctic Blvd.  
Anchorage, AK 99518

ADEC Site Identifiers:

Hazard ID #23108  
CS file # 2100.26.316

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

**Background**

Hydrocarbon contamination was noted in 1995 during the removal of a 700-gallon diesel underground storage tank (UST) used to fuel the emergency generator at this commercial building.

**Contaminants of Concern**

During the various investigations at this site, soil and, groundwater samples were analyzed for diesel range organics (DRO). Based on the results of these investigations, the following contaminant of concern was identified:

- DRO

**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>
• DRO	250

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>
• DRO	1.5

**Site Characterization and Cleanup**

During removal of the UST, approximately 38 tons of hydrocarbon impacted soil were excavated and disposed of at Anchorage Regional Landfill. The removal of impacted soil was limited by the presence of the building. Confirmation soil samples collected from the bottom and sides of the

excavation contained DRO up to 2,150 mg/kg along the northern wall of the excavation near the building.

A groundwater investigation was conducted at the site following removal of the UST. Two monitoring wells were installed downgradient of the source area, as determined by existing monitoring wells. Contaminants were not detected in groundwater at concentrations above ADEC Cleanup Levels.

### **Pathway Evaluation**

Following investigation and cleanup at the site, exposure to the remaining contaminants were 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**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Direct Contact with Surface Soil	Pathway Incomplete	Contaminated soil is not located at the surface.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	The remaining contaminated soil is below direct contact levels; beneath a building, and not available to receptors. Therefore it is considered de minimis in nature, and does not pose a significant risk.
Inhalation-Outdoor Air	De Minimis Exposure	Remaining contamination is below inhalation cleanup levels and de minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation-Indoor Air	De Minimis Exposure	The remaining contamination is below inhalation cleanup levels; and considered de minimis due to the age of the spill and lack of volatile constituents. The placement of clean fill in the excavation further mitigates risk via this pathway.

Groundwater Ingestion	De Minimis Exposure	Groundwater contamination was limited to the immediate source area and was not present in downgradient monitoring wells
Surface Water Ingestion	Pathway Incomplete	Surface water in the area is not used for drinking water purposes.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors 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**

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 Wells Fargo Bank shall report to ADEC once every five years, or as soon as Wells Fargo Bank becomes aware of any change in land ownership or use, if earlier. **The report can be sent to the ADEC project manager or electronically to DEC.ICUnit@alaska.gov.**
2. Once the contaminated soil remaining beneath the building becomes assessable, it must be evaluated in accordance with an ADEC approved work and/or to the satisfaction of ADEC.
3. Any remaining monitoring wells must be decommissioned in accordance with ADEC guidance.
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.

5. 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.

### **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.

If you have questions about this closure decision, please contact ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,



Linda Nuechterlein  
Environmental Manager

Recommended By,



William O'Connell  
Environmental Program  
Specialist

Attachment A: Corrective Action Complete- ICs Agreement Signature Page  
Attachment B: Site Figure



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

Wells Fargo Bank agrees to the terms of this Corrective Action Complete with Institutional Controls determination as stated in this Decision Document dated **May 12, 2011** for National Bank of Alaska- Benson. 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

\_\_\_\_\_  
Printed Name of Authorized Representative, Title

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**For Internal Use Only**

Project Manager: Bill O'Connell  
Hazard ID #: 23108  
CS file #: 2100.26.316

**\*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

