



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: 2245.26.005

October 5, 2016

Mr. Randy Jenski
B-J's Services, Inc.
dba Jenski Automotive
932 South Colony Way
Palmer, AK 99645

Re: Decision Document: B-J's Services Tank #3
Cleanup Complete Determination

Dear Mr. Jenski:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the B-J's Services Tank #3 located at 932 South Colony Way, Palmer, 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 unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the B-J's Services Tank #3, which is located in the ADEC office in Anchorage, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

B-J's Services Tank #3
932 South Colony Way
Palmer, AK 99645

Name and Mailing Address of Contact Party:

Randy Jenski
B-J's Services, Inc. dba Jenski Automotive
932 South Colony Way
Palmer, AK 99645

DEC Site Identifiers:

File No.: 2245.26.005
Hazard ID.: 23527

Regulatory Authority for Determination:

AAC 78 and 18 AAC 75

Site Description and Background

Four Underground Storage Tanks (USTs) were permanently closed and removed from the ground on June 10, 1994. Tanks #1 and #2 were installed in 1982 and used to store gasoline, tank #3 was installed in 1985 and housed diesel, and tank #4 was a waste oil tank. Tanks 1, 2, and 4 were managed separately from Tank 3 and were closed after the co-mingled stockpile was retested and contaminant concentrations were below ADEC cleanup levels in 1997. Please see file number 2245.26.005.01 (Tanks #1 and #2) and 2245.26.005.02 (Tank #4)

for additional information on these closures. Samples taken in situ from Tank #3 (diesel) confirmed remaining contamination above ADEC cleanup levels in 1994, and therefore required a release investigation in accordance with 18 AAC 78.235.

Contaminants of Concern

During the UST removal at this site, samples were collected from excavated soil, and sidewalls and base of the UST excavation and analyzed for Diesel Range Organics (DRO). Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Diesel Range Organics (DRO)

Cleanup Levels

The most conservative migration-to-groundwater (MTG) cleanup levels listed in 18 AAC 75.341(d) Method Two Table B2 are applicable to this site.

Table 1 – ADEC Cleanup Levels

Contaminant	Soil - MTG (mg/kg)	Soil – Inhalation (mg/kg)	Soil – Direct Contact (mg/kg)	Soil – Maximum Remaining Concentrations (mg/kg)
DRO	250	12,500	10,250	12,500

mg/kg = milligrams per kilogram; DRO = diesel range organics; MTG = migration-to-groundwater

Characterization and Cleanup Activities

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began with the removal of Four USTs on June 10, 1994. These activities are described below:

Tank 3, a 5,000-gallon diesel UST, located near the southeast corner of the property was excavated and removed on June 10, 1994. The excavation proceeded to a maximum depth of 10 feet below ground surface (bgs). Groundwater was not encountered. Following confirmation soil sample collection, the excavation was lined with 10 mil reinforced plastic and backfilled with clean, imported fill material.

Contamination was seen to the north, west and east sides of the tank, from the top of the tank to the bottom of the excavation. Confirmation soil samples collected from the base of the excavation and sidewalls of Tank 3 exceeded the DRO Matrix Cleanup Level B of 200 ppm and varied from 1,640 mg/kg to 3,310 mg/kg DRO. GRO and BTEX were not analyzed for in 1994. Samples collected from the Tank 3 stockpile exhibited levels of DRO up to 5,440 mg/kg.

Soils removed during Tank 3 excavation were eventually comingled with the soil stockpiles generated from Tanks 1, 2, and 4. This stockpile was re-sampled in 1997 and exhibited levels of DRO up to 370 mg/kg. On October 28, 1997, the consultant requested approval to landspread the stockpiled soil. On October 30, 1997 ADEC granted the request to landspread the soil, and closed Tanks #1 and #2, and #4. The stockpile was then landspread at 24-30 inches on the southwest portion of the lot. Since Tank #3 had exceeded the 1994 DRO cleanup level, and continued to do so, it was kept active until a release investigation could be completed.

In 2016 ADEC established communication with the new owner of the facility. A release investigation was conditionally approved in June 2016 and completed in July 2016. Four soil borings were completed in the vicinity of Tank #3. The soil borings were advanced to bedrock, which was encountered between 17 and 19 feet bgs. Two of the samples collected, Samples J712-1-1 and J712-1-2, exhibited detectable levels of contamination, but below cleanup levels; toluene up to 0.0243 mg/Kg, total xylenes up to 0.0876 mg/Kg, and DRO up to 170 mg/Kg.

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 meet the human health cumulative risk criteria for residential land use.

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 2.

Table 2 – 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 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	Contamination is not in groundwater and does not pose a vapor intrusion risk
Groundwater Ingestion	Pathway Incomplete	Borings met refusal at bedrock at 17-19.5 feet without encountering any groundwater.
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	Contamination is not in surface soils and are below the most stringent MTG cleanup levels.

Notes to Table 2: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be adversely 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 institutional control in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

ADEC Decision

Soil contamination at the site remains at concentrations below the most stringent MTG cleanup levels. 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.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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, P.O. Box 111800, 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) 269-2021, or email at lisa.griswold@alaska.gov.

Sincerely,



Lisa Griswold
Project Manager

Electronic cc: Spill Prevention and Response, Cost Recovery Unit
Ralph Hulbert, AlaskChem