THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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Fairbanks, Alaska 99708
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File No: 100.38.207

December 12, 2016

Arctic Couriers
P.O. Box 71668
Fairbanks, Alaska 99707

Re: Decision Document for Supply Road Septic – Riverbend Properties, Hazard ID No. 4313
Cleanup Complete Determination

Dear Mr. Rhodes:

The Alaska Department of Environmental Conservation (DEC) has reviewed the environmental records for the referenced site. This decision letter memorializes the general site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required at this property.

Site Name and Location:
Supply Road Septic – Riverbend Prop.
5690 Supply Road
Fairbanks, Alaska 99701
Fairbanks, AK 99707

Name and Mailing Address of Contact Party:
Dan Rhodes
Arctic Couriers
P.O. Box 71668

DEC Site Identifiers:
File No: 100.38.207
Hazard ID: 4313

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background
The site is a property zoned for light industrial use on which resides a single 13,000-square foot warehouse that is a combination 5-bay facility and apartment/office. The structure was built in 1969-70. At the time of investigation it was owned by Fairbanks Excavation Company, and the warehouse contained various tenants over the years. Two septic systems/injection wells serviced the facility and a former 5,000-gallon aboveground storage tank was previously located on the east side of the property used to store heating fuel.

The property underwent a Phase I Environmental Site Assessment as part of a pending property transfer. The injection wells and tank were identified as recognized environmental conditions and were addressed as part of a corrective action in coordination with EPA's Underground Injection Control Program. Subsequent site activities included removal of the injection wells, investigation of contaminated material, followed with installation of a new leach field.

Contaminants of Concern
The following petroleum contaminants of concern identified during the course of the site investigations are summarized in the Characterization and Cleanup Activities section of this decision letter.

- Diesel Range Organics (DRO)
- Benzene

Cleanup Levels
Migration to groundwater cleanup levels applied to this site for soil. Diesel range organics (DRO) were detected in soil just above the migration to groundwater (MTGW) cleanup levels established in 18 AAC 75.341(d) Table B2, and groundwater monitoring was implemented to determine whether DRO was a concern. 18 AAC 75.345(b)(1) Table C groundwater cleanup levels were used to determine whether benzene or DRO were remediated to the satisfaction of the DEC.

Table 1 – Approved Cleanup Levels

Contaminant	Groundwater (µg/l)	Highest Concentration (µg/l)
Benzene	5	43.1
DRO	1,500	1,140

Notes: µg/l = micrograms per liter

Characterization and Cleanup Activities
The referenced facility underwent Phase I and II Environmental Site Assessments that identified a heating fuel tank and two septic systems determined to be Class V injection wells that services floor drains as environmental concerns. Work was completed to include screening and assessment of the former tank location, coupled with the decommissioning and removal of both injection wells.

Subsequent work completed later in fall 2006 resulted in the removal of about 400 cubic yards of contaminated soil to an offsite location initially on Lot 20, and finally southwest of the property on Lot 17A. End point samples were collected from each Class V injection well below the point of discharge, including two samples collected from each leach field. All samples were analyzed for gasoline range organics (GRO), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), DRO, and RCRA metals.

One sample (FB2) had elevated concentrations of DRO at 488 mg/kg at the base of the excavation that exceeded the 250 mg/kg cleanup level for DRO; however, it was determined that this was de minimis in quantity with the majority of contaminated material removed through excavation.

The new leach field was located on the north end of the property in the same vicinity as the northern injection well. As a result, a groundwater monitoring program consisting of three wells surrounding the new leach field was instituted in December 2006, and was carried out thereafter until three consecutive sampling events showed concentrations below cleanup levels.

Initial sampling in 2006 showed low levels of DRO and benzene, but no contaminant above cleanup levels. Sampling in 2007 resulted in an exceedance of benzene cleanup level of 43.1 µg/l during a period of high water. Sampling was continued thereafter every three years after until 2016, with no sample exceeding cleanup criteria since the 2007 sampling event.

In March 2007, EPA issued a conditional closure for the site, stating that the injection well closure would be considered complete with submittal of the closure documentation for the contaminated soil stockpile. Sampling of the stockpile is slated for summer 2017. A new Contaminated Site will be created to address this site until such time that sampling confirms that residual concentrations have attenuated.

Cumulative Risk Evaluation
Pursuant to 18 AAC 75.325(g), 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.

Based on a review of the environmental record, DEC 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 DEC'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 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 human health-based cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below human health-based cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Contamination remains in the sub-surface, but is not volatile in nature and below human health-based cleanup levels.
Groundwater Ingestion	De-Minimis Exposure	Groundwater contamination is not present in the drinking water well and is below drinking water cleanup levels.
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	Residual contamination is not expected to reach the Chena River where aquatic life could be affected.

Notes to Table 2: "De-Minimis Exposure" means that in DEC's judgment receptors are unlikely to be affected by the minimal volume or concentration of remaining contamination. "Pathway Incomplete" means that in DEC'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.

DEC Decision

Remaining petroleum contamination in groundwater is below approved cleanup levels. This site will receive a "Closed" 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 DEC approval in accordance with 18 AAC 75.325. 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.)

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 75.380 and does not preclude DEC 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 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.

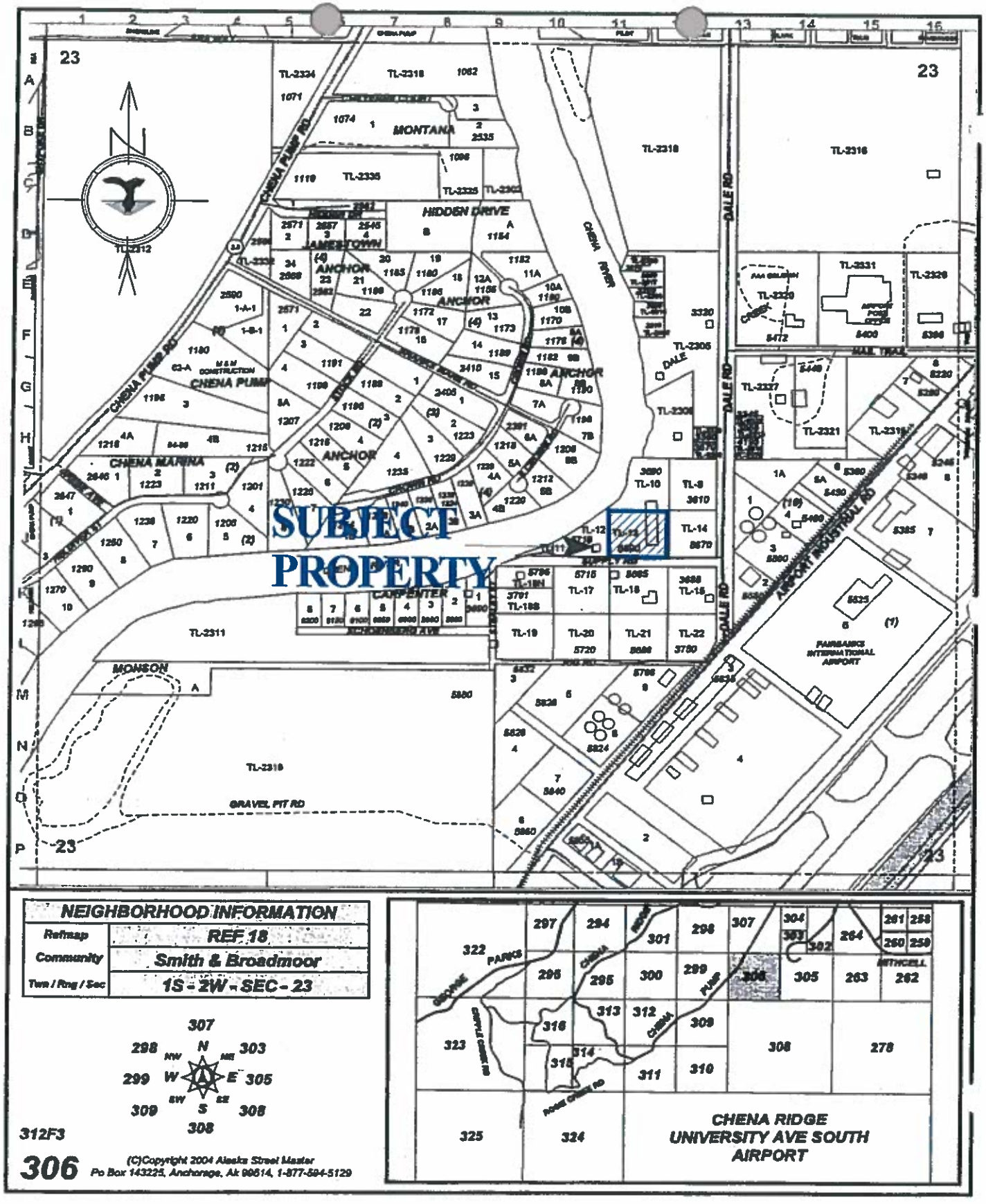
If you have questions about this closure decision, please feel free to contact me at (907) 451-2166 or at john.carnahan@alaska.gov.

Sincerely,

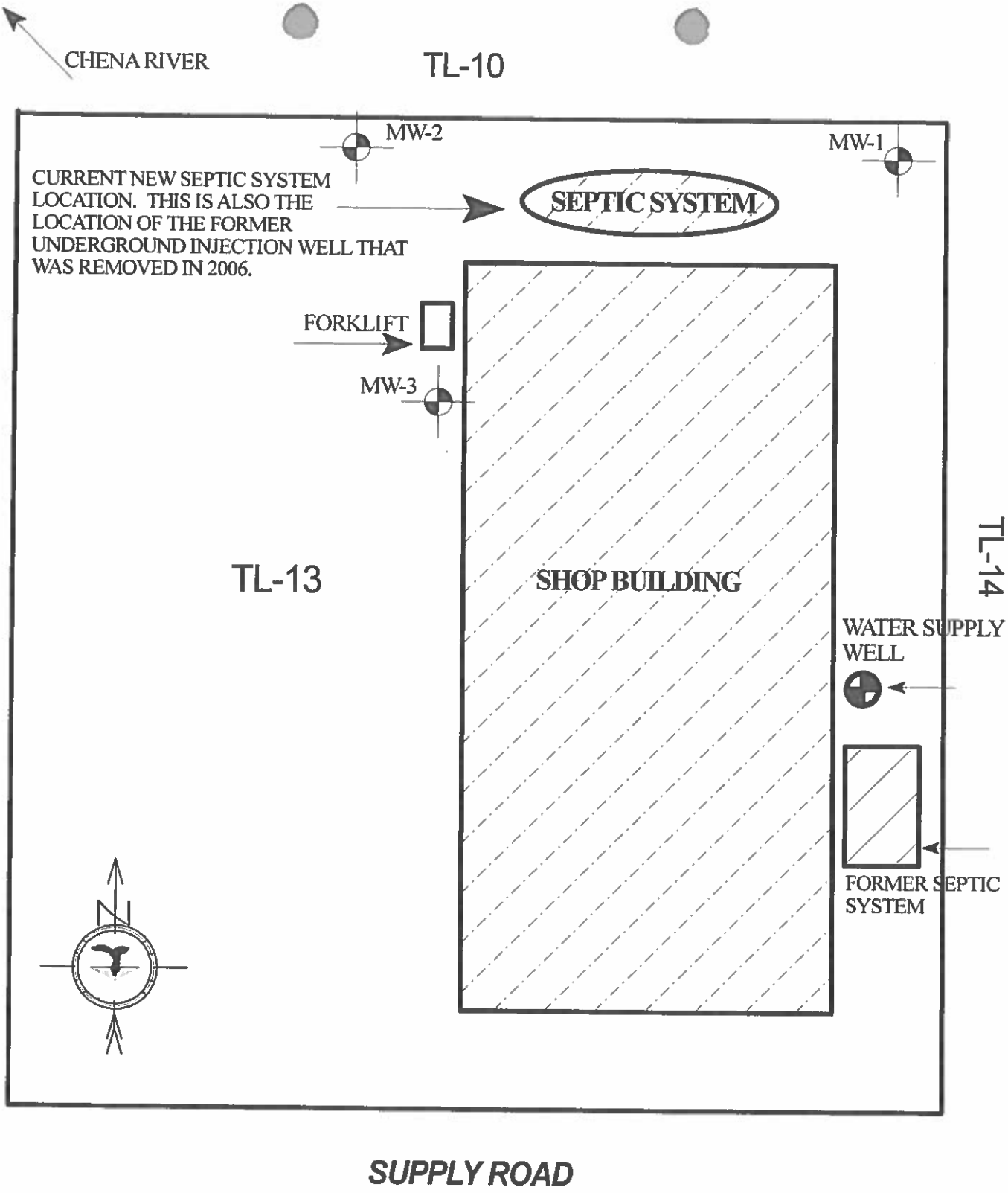
Digitally signed by John B. Carnahan
DN: cn=John B. Carnahan, o=Department of Environmental Conservation, ou=SPAR, email=john.carnahan@alaska.gov, c=US
Date: 2016.12.12 09:29:38 -09'00'

John B. Carnahan
Environmental Program Specialist
Project Manager

Attach: Location and Site Maps
CC: Spill Prevention and Response Cost Recovery Unit



TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 329 2ND STREET FAIRBANKS, AK 99701	ARCTIC COURIERS 5690 SUPPLY ROAD	FIGURE 1 LOCATION & VICINITY	
PROJECT NO.: 1272-01	FILE: Projects/1272/01/Figures/Figure 1.skf	DATE: 11/01/2006	SCALE: AS SHOWN



TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 329 2ND STREET FAIRBANKS, AK 99701	ARCTIC COURIERS 5690 SUPPLY ROAD		FIGURE 2 SITE PLAN
PROJECT NO: 1272-01	FILE: PROJECTS/1272/01/FIGURES/FIGURE 2.SKF	DATE: 12/07/2006	SCALE: