



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of  
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

555 Cordova Street  
Anchorage, AK 99501  
Phone: 907-269-7522  
Fax: 907-269-7687  
[www.dec.alaska.gov](http://www.dec.alaska.gov)

File: 2100.26.152

October 12, 2017

Mr. Jeffrey Benkert  
Bailey's Rent-All, Inc.  
6871 Old Seward Highway  
Anchorage, AK 99517

Re: **Decision Document: Baileys Rent-All  
Cleanup Complete Determination**

Dear Mr. Benkert:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Baileys Rent-All Site located at 6871 Old Seward Highway 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 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 Baileys Rent-All, 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:**

Bailey's Rent-All, Inc.  
6871 Old Seward Highway  
Anchorage, AK, 99517

**Name and Mailing Address of Contact Party:**

Mr. Jeffrey Benkert  
Bailey's Rent-All Inc.  
6871 Old Seward Highway  
Anchorage, AK, 99517

**DEC Site Identifiers:**

File No.: 2100.26.152  
Hazard ID.: 24134

**Regulatory Authority for Determination:**

18 AAC 78 and 18 AAC 75

**Site Description and Background**

The Bailey's Rent-All facility consisted of three, 1,000-gallon, single wall steel underground storage tanks (USTs) that were installed in 1984. Two tanks contained diesel fuel and one tank contained leaded gasoline. Dispensing equipment and related piping was located directly above the co-located tanks on a concrete island approximately 8 inches above grade. Petroleum contamination was present in soil and groundwater samples collected during removal of the USTs in 1991.

### Contaminants of Concern

During the course of the investigations associated with the original source area, soil and groundwater samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs), including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses, the following contaminants of concern were identified in soil and groundwater.

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

### Cleanup Levels

DRO, GRO, benzene, toluene ethylbenzene, and xylenes were detected in soil above migration to groundwater cleanup levels. Soil cleanup levels for this site are established in 18 AAC 75.341, Tables B1 and B2 for the migration to groundwater pathway. Cleanup levels for groundwater at this site are established in 18 AAC 75.345, Table C.

**Table 1 – Approved Cleanup Levels**

Contaminant	Soil (mg/kg)	Groundwater (ug/L)
DRO	250	1,500
GRO	300	2,200
Benzene	.022	4.6
Toluene	6.7	1,100
Ethylbenzene	0.13	15
Xylenes	1.5	190

mg/kg = milligrams per kilogram  
ug/L = micrograms per liter

### Characterization and Cleanup Activities

Three 1,000-gallon USTs and their associated piping were removed from a common excavation at the Bailey's Rent-All Inc. site in 1991. No free product was observed during tank removal, however initial soil samples from the excavation base and sidewalls contained contaminant concentrations exceeding ADEC Table B cleanup levels including DRO up to 12,000 mg/kg, GRO up to 5,900 mg/kg, benzene up to 41 mg/kg, toluene up to 290 mg/kg, ethylbenzene up to 69 mg/kg, and xylenes up to 410 mg/kg. Additionally, a groundwater sample collected directly from the excavation water contained benzene up to 790 ug/L.

In May 2001 the UST area was re-excavated and sampled to delineate the nature and extent of remaining contamination. Approximately 175 cubic yards of soil was excavated and stockpiled on site. Following the excavation, nine analytical soil samples were collected from the base and sidewalls which did not contain contaminant concentrations above ADEC cleanup levels. The excavation remained open, and the stockpile

remained on site until September 2001 when an additional five soil samples were collected from the excavation sidewalls, and stockpile. The soil samples did not contain contaminant concentrations above ADEC cleanup levels and the stockpiled soil was approved for use as backfill in the excavation.

One monitoring well was installed within the limits of the former UST excavation to evaluate potential impacts to groundwater at the site in 2002. One groundwater sample collected contained GRO at 3,600 ug/l, DRO at 3,200 ug/L and benzene at 160 ug/L.

Groundwater was sampled again in 2015 and 2016. During this time it was noted that recharge in the well was slow, and the well went dry during both sampling events. Groundwater sample results from both events were under ADEC Table C cleanup levels.

In October 2017 the monitoring well was decommissioned in accordance with ADEC standards.

### **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 non-carcinogenic 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**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Surface Soil Contact	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface) and is covered with a concrete slab.
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	Soil does not exceed ADEC Target Levels for Indoor Air screening.
Groundwater Ingestion	Pathway Incomplete	Groundwater is not a drinking water source at this location and is below ADEC Table C 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	Contaminant concentrations are below ADEC Cleanup levels and a concrete slab covers the area.

**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 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.
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.


Mr. Jeffrey Benkert  
Bailey's Rent-All, Inc.

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October 12, 2017

If you have questions about this closure decision, please feel free to contact me at (907) 269-7522, or email at [Chelsy.Passmore@alaska.gov](mailto:Chelsy.Passmore@alaska.gov).

Sincerely,



Chelsy Passmore  
Project Manager