



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No.: 2100.26.316

April 1, 2019

Suzanne Stehilk
Coldwell Banker Commercial Advisors
1500 West Benson Boulevard, Suite 224
Anchorage, AK 99503

Re: **Decision Document: Former National Bank of Alaska – Benson
Cleanup Complete Determination, Institutional Controls Removed**

Dear Ms. Suzanne Stehilk:

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

Site Name and Location:

Former National Bank of Alaska – Benson
1500 West Benson Blvd
Anchorage, AK 99503

Name and Mailing Address of Contact Party:

Ms. Suzanne Stehilk
Coldwell Banker Commercial Advisors
1500 West Benson Blvd., Ste. 224
Anchorage, AK 99503

DEC Site Identifiers:

File No.: 2100.26.316
Hazard ID: 23108
UST Facility ID: 2351/Tank ID: 1

Regulatory Authority for Determination:

18 AAC 78 and 18 AAC 75

Site Description, Background, Characterization, and Cleanup

The commercial office building located at 1500 West Benson Blvd. in Anchorage, Alaska is currently owned by State of Alaska Legislative Council (formerly owned by Wells Fargo Bank) and managed by Coldwell Banker Commercial Advisors. Tenants in the building include Wells Fargo Home Mortgage, Wells Fargo Bank, and State of Alaska Legislative Information Offices.

On July 13, 1995, an approximate 700-gallon underground storage tank (UST) used to supply diesel fuel to an emergency generator was removed and replaced with a 1,000 gallon tank. Diesel contamination thought to have originated from fuel lines was initially encountered at approximately 6.5 feet below ground surface (bgs) and the concentration DRO increased in depth and in the direction of the building. The vertical extent

of the contamination appeared to be mostly impeded by a clay-layer existing at 10.5 feet bgs. DRO contaminated soil was detected up to 2,150 milligrams/kilogram (mg/kg) from samples collected at the north wall of the excavation, along the building foundation. The DRO concentration exceeds migration to groundwater (MTG) cleanup levels but does not exceed clean up levels for human health. Following removal of the UST and 38 tons of hydrocarbon impacted soils, it was determined that further excavation of soil under the foundation was unsafe. A groundwater study was conducted to determine whether groundwater had been impacted. Two monitoring wells were installed down gradient of the source area and target analytes in the groundwater were all below ADEC Cleanup Levels. Soil samples were taken from the wells at 10 feet bgs just above the clay layer and target analytes in the soil were below MTG cleanup levels. On May 12, 2011, the site was listed as “Cleanup Complete with Institutional Controls.”

Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil and groundwater, and diesel range organic (DRO) is the only contaminant of concern.

Cleanup Levels

Applicable cleanup levels for this site are outlined in 18 AAC 75.341(c), Table B2. 18 AAC 75.345 Table C outlines the applicable groundwater cleanup levels. The approved cleanup levels are shown below in the table:

Approved Cleanup Levels Table

Contaminant	Soil – Migration to Groundwater (mg/kg)	Soil – Human Health (mg/kg)	Groundwater (mg/L)	Maximum Soil Concentrations Remaining Onsite (mg/kg)
DRO	250	10,250	1.5	2,150

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, 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 or Pathway Incomplete. A summary of this pathway evaluation is included below:

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 cleanup levels and is below the building or very near the foundation.
Inhalation – Outdoor Air	De-Minimis Exposure	Remaining contamination is below inhalation cleanup levels and of limited volume.
Inhalation – Indoor Air	De-Minimis Exposure	Remaining contamination is below inhalation cleanup levels and of limited volume. The age of the spill, lack of volatile constituents, and clean fill further reduces risk.
Groundwater Ingestion	De-Minimis Exposure	Groundwater contamination is below Table C groundwater cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Surface water was not impacted by contamination.
Wild and Farmed Foods Ingestion	Pathway Incomplete	The site is paved and wild foods are not collected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	No aquatic or terrestrial routes are present.

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.

ADEC Decision

Based on further review of the file and recent information obtained from a related site (Hazard ID: 27008) ADEC has determined that remaining contamination in soil is below ADEC Method Two cleanup levels (18 AAC 75.341 Tables B1 and B2) for human health and institutional controls are no longer necessary. Soil contamination does still remain above the migration to groundwater cleanup level beneath the building; however, groundwater has been shown to meet cleanup levels and ADEC has made a determination that contamination in soil is at equilibrium and will not migrate to groundwater. This site will receive a “Cleanup Complete” designation on the Contaminated Sites Database and the institutional controls will be removed. The site is subject to the standard conditions listed below.

Standard Conditions

1. Any proposal to transport soil or groundwater from a site that is subject to the site cleanup rules 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 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 20 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) 334-5939, or email at Jamie.Grant@alaska.gov.

Sincerely,



Jamie Grant
Project Manager

Attachments: ADEC Decision Document – Former National Bank of Alaska – Benson “Corrective Action Complete – Institutional Controls Determination”

cc: Spill Prevention and Response, Cost Recovery Unit (electronic copy)
Kara Kusche, ADEC (SPAR) Contaminated Sites program (electronic copy)
Dan P McMahon, Associate, Shannon & Wilson (electronic copy)
Bob Cloud, Wells-Fargo Bank

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

SEAN PARNELL, GOVERNOR

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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

Pathway	Result	Explanation
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

Mr. Bob Cloud

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May 12, 2011

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).

Michael Schwinghammer Property Manager
Signature of Authorized Representative, Title

MICHAEL SCHWINGHAMMER PROPERTY MANAGER
Printed Name of Authorized Representative, Title

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

