



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

Department of  
Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE  
Contaminated Sites Program

555 Cordova Street  
Anchorage, Alaska 99501  
Phone 907.269.7503  
Fax: 907.269.7649  
dec.alaska.gov

File No: 2100.26.031

Article No.: 7012 1010 0003 0389 0115

October 16, 2012

Mr. Bruce K. Anthony  
Holiday Alaska, Inc.  
4567 American Blvd West  
Bloomington, MN 55437

Re: Decision Document; Holiday Station Store #630 / Williams Express Store #5030;  
and Holiday Station Store #630 / Williams Express Store #5030 Overfill sites;  
Corrective Action Complete Institutional Controls Determination

Dear Mr. Anthony;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records and project files associated with the following two contaminated sites, which are identified in the Contaminated Sites (CS) database as: *Holiday Station Store #630 / Williams Express Store #5030* and *Holiday Station Store #630 / Williams Express Store #5030 Overfill*. Both sites/source areas are collocated at 3727 Spenard Road in Anchorage, Alaska. Based on the information provided to date, ADEC has determined that the contaminant concentrations remaining do not pose an unacceptable risk to human health or the environment, and these sites will be closed.

This decision is based on the project files for the subject sites, which are located in the ADEC offices in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of these sites, and provides a summary of the regulatory issues considered in the Corrective Action Complete with Institutional Controls (CC-IC) Determination.

### Introduction

#### Site Names and Location:

Holiday Station Store #630 / Williams Express Store #5030 **and**  
Holiday Station Store #630 / Williams Express Store #5030 Overfill  
3727 Spenard Road  
Anchorage, Alaska 99514

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

Mr. Bruce K. Anthony  
Holiday Alaska, Inc.  
4567 American Blvd. West  
Bloomington, MN 55437

**Database Record Key and File Number:**

ADEC Reckey Numbers: 1999210017301 and 2001210008101  
File No.: 2100.26.031  
Hazard IDs: 23316 and 22986

**Regulatory authority under which the site is being cleaned up:**

18 AAC 75 and 18 AAC 78

**Background**

There have been multiple release events associated with Holiday's operation of this facility, and there are multiple contaminated sites affecting this property. (According to 18 AAC 75.990.115, a site is defined as "an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.") In short, three release events associated with Holiday's ongoing operations affect this property, and one release event has migrated onto the northwestern portion of Holiday's property from Chevron Station #9014 at 3608 Minnesota Drive. Chevron is addressing contamination from their site, which is being tracked separate from the subject Holiday source areas/sites and is identified in the CSP database as *Chevron - #9014*, ADEC File No. 2100.26.057. The implications of Chevron's contamination are discussed in the "ADEC Decision" section, below.

The first documented release on the subject property occurred in 1999, followed by a second release in 2001, and a third on January 4, 2010. The first two releases occurred when the protective "overflow buckets" overflowed during filling of the facility's 10,000 gallon underground storage tanks. Contamination from these two events had been adequately addressed, and ADEC issued a Corrective Action Complete (CC) with Institutional Controls (ICs) decision letter on December 4, 2009. Holiday had not signed the letter before a third release event occurred on January 4, 2010. Therefore, the CC IC decision letter was rescinded, and the site was reopened but not before a second file had been created as a result of the third release.

The third event occurred when trenching activity, associated with facility upgrades, ruptured a fuel line and released an estimated volume of less than 50 gallons of gasoline (based on fuel line length and diameter) over a geotextile liner, which was installed after the 2001 release event. The liner remained intact throughout the 2010 excavation and remediation processes.

**Contaminants of Concern**

During the site investigations, soil and groundwater samples were analyzed for gasoline range organics (GRO), benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses the following contaminants of concern (COCs) were identified:

- Gasoline Range Organics (GRO)
- Benzene

- Toluene
- Ethylbenzene
- Xylenes

### Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B1 and B2, Migration to Groundwater (MTG) *Over 40 Inch Zone*. \*All contaminant concentrations in soil are presented in units of mg/Kg.

Contaminant of Concern	Medium	Method Two-Migration to Groundwater*	Maximum Concentration Detected*
GRO	Soil	300	9,670
Benzene	Soil	0.025	225
Toluene	Soil	6.5	1,650
Ethylbenzene	Soil	6.9	347
Xylenes	Soil	63	1,667

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels. \*All concentrations in groundwater are presented as mg/L.

Contaminant of Concern	Medium	Method Two-Migration to Groundwater*	Maximum Concentration Detected
GRO	Groundwater	2.2	25
Benzene	Groundwater	0.005	3.3
Toluene	Groundwater	1.0	2.1
Ethylbenzene	Groundwater	0.7	0.19
Xylenes	Groundwater	10	2.5

### Characterization and Cleanup Activities

Analysis of soil samples taken during the initial spill response revealed maximum soil contaminant concentrations at eight feet (ft.) Below Ground Surface (BGS) in an area less than six ft. long by six ft. wide by four ft. deep, as shown in Table 1. Surrounding soil was screened with a photoionization device (PID), and analytical samples were collected. One additional borohole was advanced approximately three ft. west of the ruptured pipe (Soil Boring B9) to a total depth of fourteen ft. BGS.

Soil samples from boring B9 contained the highest contaminant concentrations with benzene concentrations at 2.53 milligrams per kilogram (mg/Kg) at fourteen ft. BGS, which exceeds the ADEC Method Two "Migration to Groundwater" (MTG) cleanup levels of 0.025 mg/kg. This contamination likely remained from a release in 1999 or 2001 since it was collected from beneath the intact liner and lacked continuous contamination from the surface. Other COCs analyzed from this boring included Gasoline Range Organics (GRO), Toluene, Ethylbenzene, and Xylenes, but all were below ADEC cleanup levels. Approximately five cubic yards of contaminated soil were removed down to the geotextile liner at four ft. BGS during the initial response. The excavation was then filled with clean backfill, so subsequent sampling over the liner would have been impractical.

Soil and groundwater samples collected from adjacent areas were below GRO or BTEX migration to groundwater cleanup levels. Nevertheless, the Air Injection / Vapor Extraction System (AIVES) that was installed in 2003 to address the second release was reactivated on January 22, 2010, and additional wells were added to the AIVES in March 2010. Field screening measurements of air quality from the AIVES exhaust stack had stabilized at background levels by March 2010, so the system was deactivated on June 4, 2010.

Groundwater was sampled from four monitoring wells located nearby and/or downgradient. None contained detectable COCs during the five groundwater sampling events that followed the January 2010 release. Analytical sampling revealed that contaminant concentrations had fallen below default ADEC cleanup levels by August 2011, and remained below the method reporting limits (AK 101 and EPA Method 8021B) when sampled on April 20, 2012.

**Table 1**

Contaminant of Concern	Medium	Method Two-Migration to Groundwater*	Maximum Concentration Detected*	Depth of Maximum Concentration*	Location of Maximum Concentration
GRO	Soil	300	9,670	8'	S11
Benzene	Soil	0.025	225	8'	S11
Toluene	Soil	6.5	1,650	8'	S11
Ethylbenzene	Soil	6.9	347	8'	S11
Xylenes	Soil	63	1,667	8'	S11
GRO	Groundwater	2.2	25	12.9'	B1MW
Benzene	Groundwater	0.005	3.3	12.9'	B1MW
Toluene	Groundwater	1.0	2.1	12.9'	B1MW
Ethylbenzene	Groundwater	0.7	0.19	12.9'	B1MW
Xylenes	Groundwater	10	2.5	12.9'	B1MW

**Table 1.** *Maximum Concentration Detected* represent all three release events. \*Contaminant concentrations in soil are presented in units of mg/Kg, and contaminant concentrations in water are presented in units of mg/L.

### Pathway Evaluation

Following investigation and cleanup at this site, exposure to remaining contaminants were evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are conduits by which contamination may reach human and/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 depicted in Table 2.

**Table 2 – Exposure Pathway Evaluation**

Exposure Pathway	Result	Explanation
Surface Soil Contact	De Minimis Exposure	Contaminated soil was excavated and replaced with clean soil. Confirmation sampling indicated that contaminated soil had been removed; therefore, risk via this pathway is considered insignificant.

Sub Surface Soil Contact	De Minimis Exposure	Four years of AIVES treatment followed excavation/backfill activity, which appeared to have removed most of the subsurface contamination. Annual sampling after most recent release indicated that remaining COCs are below ADEC Method Two, Ingestion, Direct Contact cleanup levels
Inhalation – Outdoor Air	De Minimis Exposure	Remaining soil contamination is well below the inhalation levels for all COCs. Therefore, the contamination remaining is considered de minimis in nature, and the risk posed by this pathway is considered to be insignificant.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	Remaining soil contamination is located at depth and is below inhalation levels for COCs. Therefore, the risk posed via this pathway is considered to be insignificant.
Groundwater Ingestion	De Minimis Exposure	Groundwater data show that COCs are either below MFG cleanup levels or non detect. Therefore, their risk is considered to be insignificant.
Surface Water Ingestion	Pathway Incomplete	Area lacks surface water within ¼ mile of this site.
Wild Foods Ingestion	Pathway Incomplete	This site is a paved, commercial facility in downtown Anchorage and not used for harvesting wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	Remaining contamination is below ADEC cleanup levels, and there is no evidence of prior ecological damage. There are no complete exposure pathways to ecological receptors at this 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**

Holiday’s cleanup activities have adequately addressed their 1999, 2001, and 2010 release events in the central and northeastern portion of this property. These release events can all be considered to have impacted the same region, or site, within this facility. However, contamination continues to affect a second region in the northwestern portion of Holiday’s property as a result of migration of a groundwater plume from Chevron Station #9014 located at 3608 Minnesota Drive. Therefore, Chevron will continue to address contamination affecting the northwestern portion of Holiday’s property using monitoring wells B2MW, B5MW, and B6MW.

Based on available information, ADEC has determined that there is no longer an unacceptable risk to human health or the environment in the central and northeastern portion of this facility, and no further assessment or cleanup action is required by Holiday. Therefore, the Holiday sites identified as: *Holiday Station Store #630 / Williams Express Store #5030 AND Holiday Station Store #630 / Williams Express Store #5030 Overfill* will be designated as “Corrective Action Complete with Institutional Controls” in the Department’s database subject to the following conditions.

1. All monitoring wells **except B2MW, B5MW, and B6MW** will be decommissioned in accordance with ADEC guidelines prior to **January 1, 2013**. Holiday Alaska, Inc.(Holiday) will coordinate with Chevron to determine which company (Holiday or Chevron) will eventually decommission these three remaining monitoring wells, following ADEC's future approval. Decommissioning of monitoring wells must be documented in a report submitted to ADEC by March 2013.
2. Decommissioning of monitoring wells B2MW, B5MW, and B6MW, as well as installation of future groundwater wells will require approval from ADEC. Note: all monitoring wells must be decommissioned prior to the future removal of institutional controls.
3. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office pursuant to 18 AAC 78.280 that identifies the nature and extent of contamination at the property and any conditions to which the owners and operators are subject in accordance with this decision document. The NEC will remain in effect until a written determination from ADEC is recorded; stating that the soil and groundwater at this site meets the most stringent cleanup levels (i.e. Method Two of 18 AAC 75.341 for soil and 18 AAC 75.345, Table C for groundwater), and that all monitoring wells are decommissioned including B2MW, B5MW, and B6MW.
4. Any future change in land use may impact the exposure assumptions cited in this document and therefore affect the usefulness of current ICs. Therefore, the responsible party (Mr. Anthony or Holiday's designated representative) shall report to ADEC **every three years** to document land use, or report as soon as Holiday becomes aware of any change in land ownership and/or use, if earlier. **This report can be sent to the local ADEC office or electronically to [DEC.ICUnit@alaska.gov](mailto:DEC.ICUnit@alaska.gov).**
5. Any proposal to transport soil or groundwater offsite 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, regardless of property ownership. (See attached site figure.)

Although a Corrective Action Complete Institutional Controls determination is being granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.600(h). It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful, so confirmation samples should be analyzed prior to transport and soil deposition. 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 the ADEC project manager, Richard Bernhardt at (907) 269-7546.

Approved By:

Recommended By:



Linda Nuechterlein  
Environmental Manager



Richard R. Bernhardt, PhD  
Environmental Program Specialist

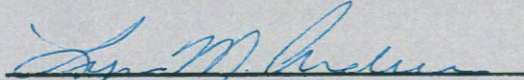
Cc: Dan McMahon, Shannon & Wilson

Enclosures:

- Attachment A: Cleanup Complete-ICs Agreement and Signature Page
- Attachment B: Figure 1

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

Lynn M. Anderson /Holiday Alaska, Inc agrees to the terms of this Corrective Action Complete with Institutional Controls determination as stated in this Closure Decision Document dated October 16, 2012 for Holiday Station Store #630 / Williams Express Store #5030 AND Holiday Station Store #630 / Williams Express Store #5030 Overfill. 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 18 AAC 78.276(f).



Signature of Authorized Representative, Title  
Lynn M. Anderson / Holiday Alaska, Inc.

Lynn M. Anderson, Assistant Secretary  
Printed Name of Authorized Representative, Title  
Lynn M. Anderson / Holiday Alaska, Inc.

**Note to Responsible Person (RP):**

**After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.**

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ADEC File No.                   2100.26.031  
Hazard ID:                       23316

AND

ADEC File No.                   2100.26.031  
Hazard ID:                       22986  
ADEC Project Manager:       Richard R. Bernhardt, PhD

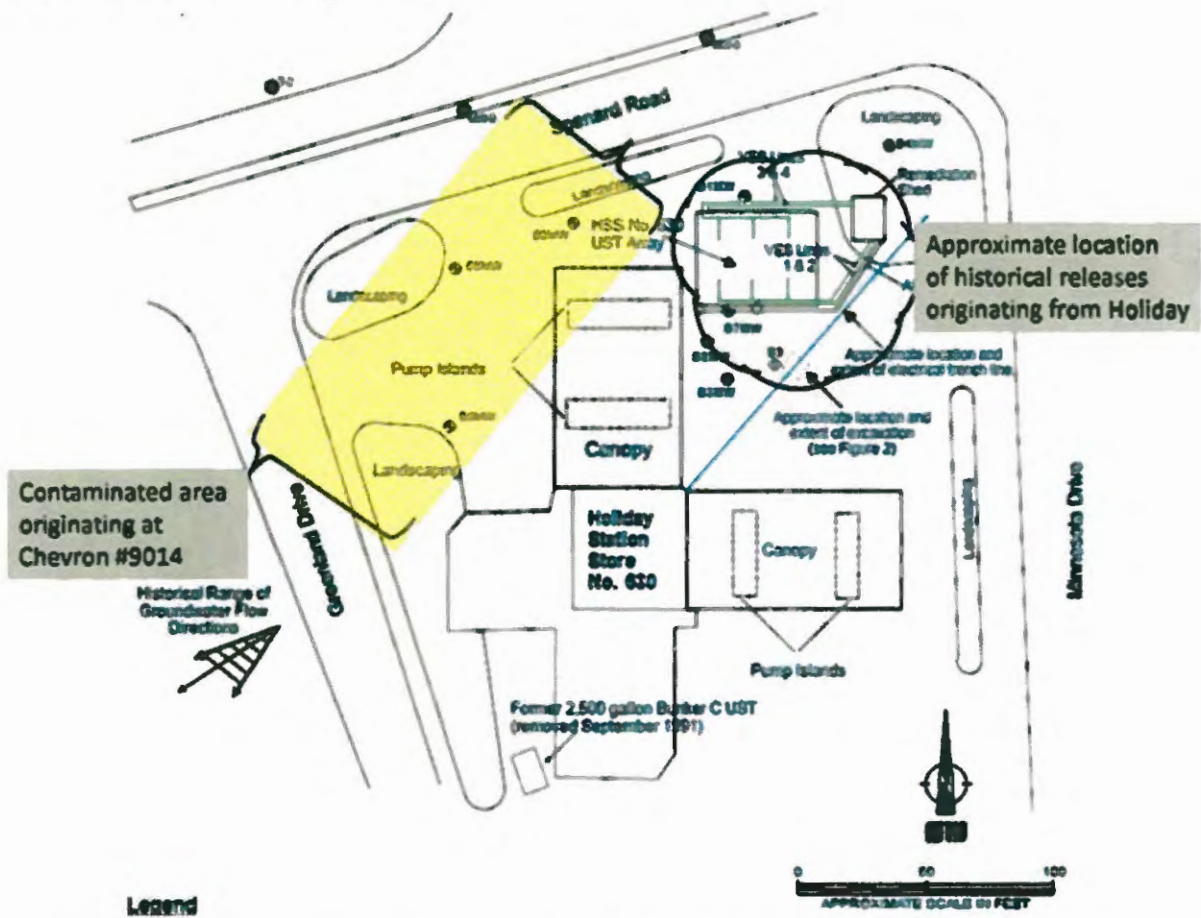
**For Internal Use Only**

**\*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: Figure 1**



**Figure 1: Approximate regions of contamination affecting Holiday Station Store #630 at 3727 Spenard Road, Anchorage, AK.**