THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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Anchorage, Alaska 99501
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dec.alaska.gov

File No: 2100.26.192

June 19, 2014

Teri Gunter
Senco Alaska Inc.
877 East Dowling Road
Anchorage, AK 99518

Re: Decision Document: Senco Alaska
Corrective Action Complete Determination – Institutional Controls

Dear Ms. Gunter:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the Senco Alaska site, located at 877 East Dowling Road in Anchorage, Alaska. This decision letter memorializes the site history, cleanup actions, and specific conditions required to effectively manage remaining contamination. No further remedial action will be required as long as compliance with these conditions is maintained.

Site Name and Location:
Senco Alaska
877 East Dowling Road
Anchorage, AK 99518

Name and Mailing Address of Contact Party:
Teri Gunter
Senco Alaska
877 East Dowling Road
Anchorage, AK 99518

DEC Site Identifiers:
File No: 2100.26.192
Hazard ID: 24362

Regulatory Authority for Determination:
18 AAC 75 and 18 AAC 78

Site Description and Background
Two registered gasoline underground storage tanks (USTs) were installed at the Senco Alaska property (ADEC Facility ID: 3258) in January of 1974. One of the USTs (Tank 1) had a capacity of 2,000 gallons and the other (Tank 2) had a capacity of 1,000 gallons. During a scheduled sewer line replacement near Tank 1 in October of 1998, the Alaska Telephone Utility (ATU) encountered strong gasoline odors. The ATU safety coordinator promptly reported the release to the ADEC.

Contaminants of Concern
The following petroleum contaminants of concern (COCs) (above approved cleanup levels) were identified during the course of the site investigations, and are summarized in the Characterization and Cleanup Activities section of this decision letter.

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

Cleanup Levels
Concentrations of GRO, and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in soil above the Method Two "migration to groundwater" (MTG) cleanup levels for the under 40-inch precipitation zone for Table B1 and Table B2 established in 18 AAC 75.341(c) and 18 AAC 75.341(d) respectively. Additionally, GRO and benzene were detected in groundwater above the cleanup levels established in 18 AAC 75.345 Table C.

Table 1 – ADEC Cleanup Criteria

Contaminant	Soil – Migration to Groundwater (mg/kg)	Soil – Direct Contact (mg/kg)	Soil – Inhalation (mg/kg)	Groundwater (mg/L)
GRO	300	1,400	1,400	2.2
Benzene	0.025	150	11	0.005
Toluene	6.5	8,100	220	1.0
Ethylbenzene	6.9	10,100	110	0.7
Xylenes	63	20,300	63	10

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

Characterization and Cleanup Activities
Release investigation and corrective action activities conducted under regulatory authority of the Contaminated Sites Program began in October of 1998. These activities are described below.

Tank 1 was located near the northeast corner of the Senco Alaska building and was removed on October 28, 1998. The soils removed from the Tank 1 excavation were field screened using a photoionization detector (PID) to evaluate for the presence of volatile organic compounds (VOCs) and were temporarily stockpiled based on screening results. Confirmation soil samples were collected from the Tank 1 excavation and were analyzed for GRO, BTEX, and lead. Analytical results indicated that GRO and benzene remained in the excavation beneath the onsite building and also in the bedding sand beneath a sewer line at concentrations above ADEC cleanup criteria. (Please see the enclosed site map for sample locations and results.)

The extent of soil contamination was not defined beneath the sewer line to the south; however, two collection galleries (named Monitoring Wells MW1 and MW2, respectively) were installed adjacent to the sewer line for the purpose of in-situ remediation or future groundwater monitoring.

Tank 2, located near the northwest corner of the Senco Alaska Building, was removed on October 29, 1998. Soils removed from the Tank 2 excavation were field screened and sampled using the same procedures and analysis described for Tank 1. None of the confirmation soil samples collected from the Tank 2 excavation exhibited contaminant concentrations that exceeded the ADEC cleanup criteria. Approximately 390 cubic yards (cy) of soil were removed from the Tank 1 and Tank 2 excavations and transported to Alaska Soil Recycling (ASR) for thermal treatment. Groundwater was encountered in both excavations at roughly seven to ten feet below ground surface (bgs).

In May of 1999, Monitoring Well MW2 was developed, purged, and sampled. The water sample indicated that GRO and benzene were present in the groundwater above the ADEC cleanup criteria. As such, a test pit was excavated roughly 100 feet south of MW2 to evaluate for contaminant migration along the buried sewer line. Excavation commenced to 11 feet bgs and groundwater was not encountered. Because no visual or olfactory signs of contamination were present, only one soil sample was collected from the base of the test pit. Analytical results indicated that benzene remained in this area at a concentration of 0.025 milligrams per kilogram (mg/kg), which is equal to the ADEC cleanup criterion for benzene (0.025 mg/kg).

To further evaluate for contaminant migration, a third monitoring well (MW3) was installed down gradient of the remaining contamination. The soil boring for MW3 was advanced to 40 feet bgs; confirmation soil samples were collected at intervals from 11 feet to 16 feet, and from zone of seasonal fluctuation. None of the soil samples exhibited contaminant concentrations that exceeded the ADEC cleanup criteria.

Between May of 1999 and April of 2001, numerous groundwater sampling events were completed, as shown below in Table 2.

None of the water samples collected over the last four groundwater monitoring events exhibited any contaminants above the ADEC cleanup criteria. See Table 3 below for remaining contaminant concentrations.

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.

The total risks exceed the benchmark values of a cancer risk of 0.00001; however, the remaining soil contamination is not accessible and, at this time, does not pose an unacceptable risk to human health or the environment.

Table 2 – Historical Groundwater Sampling Results

Well Number	Date Sampled	GRO (mg/L)	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Total Xylenes (mg/L)
MW1	26-Aug-99	0.14	**0.0154**	ND	0.00847	0.0138
MW1	6-Dec-99	ND	0.00148	ND	ND	ND
MW1	7-Apr-00	ND	ND	ND	ND	ND
MW1	20-Jun-00	ND	0.00508	ND	0.00273	ND
MW1	8-Sep-00	ND	0.00051	ND	ND	ND
MW2	28-May-99	**7.3**	**0.25**	0.815	0.259	1.89
MW2	26-Aug-99	0.89	**0.00561**	0.0043	0.0206	0.0743
MW2	6-Dec-99	**4.9**	**0.0632**	0.273	0.0917	0.489
MW2	7-Apr-00	ND	ND	ND	ND	ND
MW2	20-Jun-00	ND	0.00096	ND	ND	ND
MW2	8-Sep-00	ND	0.00057	ND	ND	ND
MW2	5-Apr-01	ND	0.00053	ND	ND	ND
MW3	8-Jun-99	ND	ND	ND	ND	ND
MW3	26-Aug-99	ND	ND	ND	ND	ND
MW3	6-Dec-99	ND	ND	ND	ND	ND
MW3	7-Apr-00	ND	ND	ND	ND	ND
MW3	20-Jun-00	ND	ND	ND	ND	ND
ADEC Cleanup Criteria (mg/L)	N/A	2.2	0.005	1	0.7	10

mg/L = milligrams per liter
ND = not detected above the laboratory detection limits
Bold = result exceeded the ADEC cleanup criteria

Table 3 – Remaining Contaminant Levels

Contaminant	Soil (mg/kg)	Water (mg/L)
GRO	2,980	NA
Benzene	15.9	0.00053
Toluene	144	NA
Ethylbenzene	89.2	NA
Xylenes	405	NA

mg/kg = milligrams per kilogram
mg/L = milligrams per liter
NA = contaminant concentrations not present in the most recent activities

Table 4 – 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 above direct contact levels in the sub-surface soil in the Tank 1 excavation beneath a sewer line. The soil is inaccessible and considered de-minimis, and therefore does not pose an unacceptable risk.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface above inhalation cleanup levels; however, the area of remaining contamination is covered with several feet of clean fill, with a concrete cap, and is located in an alley with limited access.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Vapor intrusion risk is mitigated from contamination potentially remaining beneath the Senco Alaska building due to the distance between the remaining contamination and the concrete slab floor underlain by several feet of fill. Furthermore ventilation is supplied from several large overhead garage doors that are opened frequently throughout the day to allow vehicle access and loading.
Groundwater Ingestion	De-Minimis Exposure	Contamination remains in the groundwater below the ADEC cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Surface water is not contaminated and is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	This site is not located in an area utilized for foraging activities.
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 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 administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

Petroleum contamination remains on-site in soil above ADEC cleanup levels; however ADEC has determined there is no unacceptable risk to human health or the environment as long as the contamination is properly managed in accordance with the following conditions.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, these management conditions may not be protective and ADEC may require additional remediation and revised conditions. Therefore Senco Alaska Inc shall report to ADEC every 5 years to document land use, or report as soon as

Senco Alaska Inc becomes aware of any change in land ownership and/or use, if earlier. The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.

2. Installation of groundwater wells requires ADEC approval.
3. Sub-surface soil contamination remains beneath the Senco Alaska building and below the buried sewer line. When the soil becomes accessible, the soil must be evaluated and contamination addressed to the satisfaction of ADEC.
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.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. Institutional controls will be removed in the future if documentation can be provided that shows cleanup levels have been met. Management conditions 4 and 5 remain in effect after ICs are removed.

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 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.

Please sign and return *Attachment A* to ADEC <u>within 30 days of receipt of this letter</u>. If you have questions about this closure decision, please feel free to contact me at (907) 269-7691 or joshua.barsis@alaska.gov.

Sincerely,

Joshua Barsis
Environmental Program Specialist III

Enclosures: Attachment A (Signature Page)
Site Map

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

Teri Gunter on behalf of Senco Alaska Inc. agrees to the terms and conditions of this Corrective Action Complete Determination, as stated in this decision letter for the Senco Alaska site, dated June 19, 2014. Failure to comply with the terms and conditions of the determination may result in ADEC reopening this site and requiring further remedial action in accordance with18 AAC 18 AAC 78.276(f).

Teri L Gunter
Signature of Authorized Representative, Title
Teri Gunter/Senco Alaska Inc.

10-18-2016
Date

Teri Gunter
Printed Name of Authorized Representative, Title
Teri Gunter/Senco Alaska Inc.

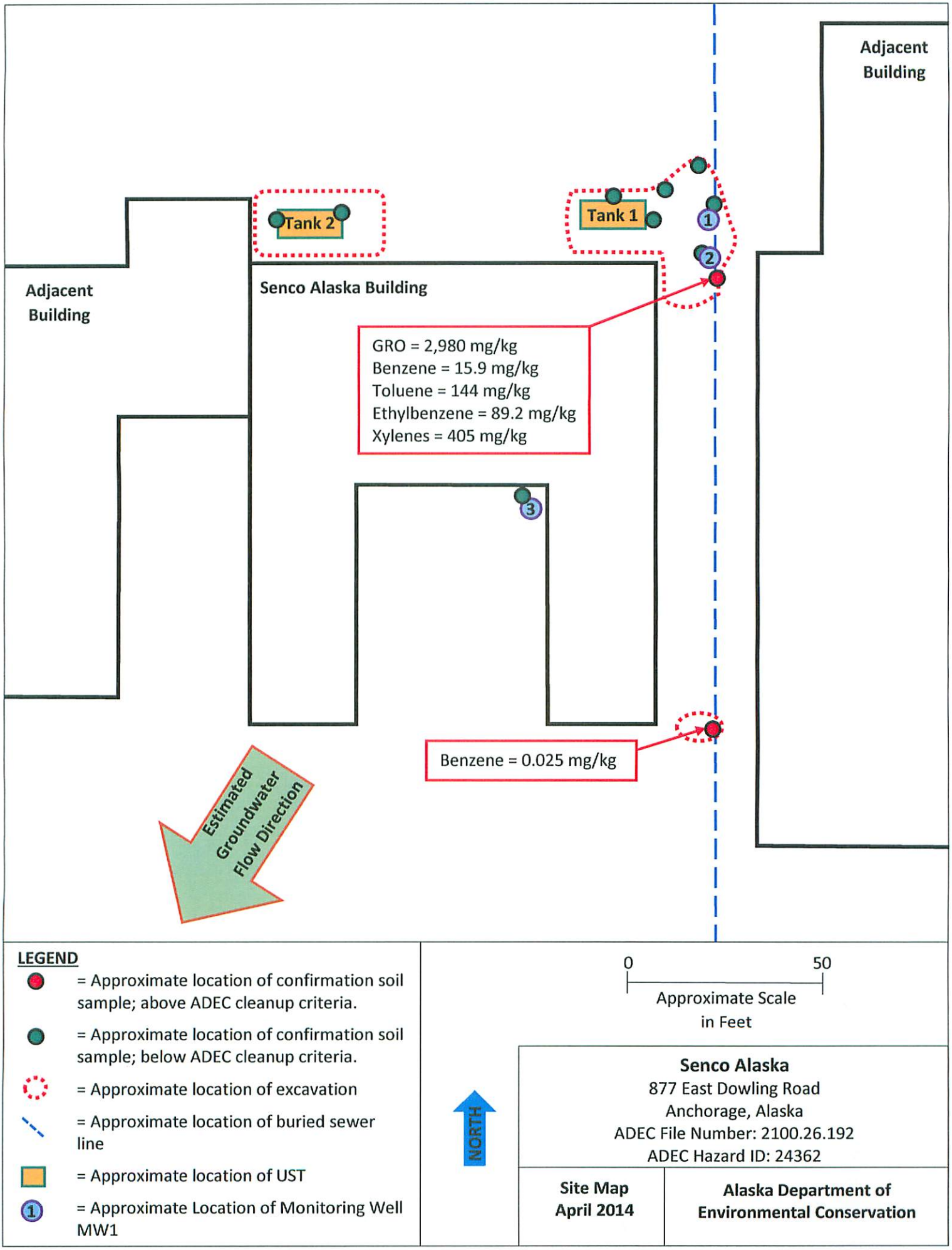
Note to Responsible Person (RP):
After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

ADEC File No. 2100.26.192
Hazard ID: 24362
ADEC Project Manager: Joshua Barsis

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



LEGEND

- = Approximate location of confirmation soil sample; above ADEC cleanup criteria.
- = Approximate location of confirmation soil sample; below ADEC cleanup criteria.
- = Approximate location of excavation
- = Approximate location of buried sewer line
- = Approximate location of UST
- = Approximate Location of Monitoring Well MW1

0 — 50

Approximate Scale in Feet

NORTH

Senco Alaska
877 East Dowling Road
Anchorage, Alaska
ADEC File Number: 2100.26.192
ADEC Hazard ID: 24362

Site Map April 2014	Alaska Department of Environmental Conservation