

## Department of Environmental Conservation

SPILL PREVENTION & RESPONSE Contaminated Sites Program

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> > File: 102.38.123

December 20, 2019

Electronic Delivery Only
Jon Cook, CFO
J&J Development, LLC
PO Box 72578
Fairbanks AK 99707

Jan Shifflett, Environmental Manger Alyeska Pipeline Service Co. 3700 Centerpoint Dr Anchorage AK 99503

RE: Soil Gas Sampling near Ulta Beauty

Dear Mr. Cook and Mr. Shifflett:

Thank you for meeting with the Alaska Department of Environmental Conservation Contaminated Sites Program (DEC) on December 6<sup>th</sup>. As discussed during the meeting, DEC is requesting that Alyeska conduct soil vapor sampling at a minimum of three locations in the area just east of the Ulta Beauty store located on Merhar Ave in Fairbanks. The purpose of the sampling is to evaluate the potential for vapor intrusion of trichloroethylene (TCE) vapors into Ulta Beauty. DEC requests that the samples be collected from vapor monitoring points, for the purpose of data quality, installed to a depth of 8-12 feet below ground surface. Please submit a brief workplan for DEC review and approval that outlines your approach to this sampling effort including proposed sampling locations, depths, well construction, data quality objectives and other information as appropriate.

Upon receipt of validated data from Alyeska demonstrating their representativeness and usability and assuming reasonable certainty of data quality has been achieved, DEC will compare the TCE concentrations in soil vapor to the DEC Soil Gas Commercial Target Level for TCE of 84 micrograms per cubic meter (ug/m3) found in Appendix E of the November 2017 *Vapor Intrusion Guidance For Contaminated Sites*. Additional action on vapor intrusion at the site will be based on the following:

• If TCE concentrations in soil vapor at any of the sampling locations are at or above 84 µg/m³, evaluation of the HVAC system for Ulta Beauty will be required and, barring any additional vapor intrusion assessment, an environmental covenant and an Institutional

Control Management Plan will be established to specify that proper operation and maintenance of the HVAC system are required as an engineering control to mitigate potential vapor intrusion risk..

- If all soil vapor samples contain TCE concentrations less than 84 ug/m3, one additional sampling event will be conducted in 2020 and if concentrations remain below 84 ug/m3 additional soil vapor sampling will not be required, and additional evaluation of the vapor intrusion pathway, including HVAC operational parameters at Ulta Beauty will not be necessary.
- If soil vapor samples do not contain detectable concentrations of contaminants of concern, Alyeska or J&J Development may request that the required second sampling event be waived.

DEC appreciates the cooperation of both Alyeska and J&J Development in this matter and we look forward to working with you to continue protecting human health and the environment and facilitating the productive use of the former Bentley Tax Lot 201.

If you have any questions or would like to discuss this, or other matters relating to the environmental status of this site, please contact me at <a href="mailto:bill.oconnell@alaska.gov">bill.oconnell@alaska.gov</a> or by phone at 907-269-3057

Sincerely,

Bill O'Connell

Environmental Program Manager

cc (via email): John Halverson, ADEC Contaminated Sites Program Manager

Janine Boyette, Alyeska Response and Remediation SME

Janice Wiegers, ADEC Unit Manger Jim Fish ADEC Project Manager