



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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File: 2100.26.463

February 11, 2021

Frank Martin  
BM Old Seward LLC  
3030 Highlands Drive  
Las Vegas, Nevada 89109

Re: Decision Document: Parker Drilling Company  
Cleanup Complete Determination

Dear Mr. Martin:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Parker Drilling Company site located at 10560 Old Seward Highway, 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 unless information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Parker Drilling Company site, which is located in the ADEC office in Fairbanks, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

**Site Name and Location:**  
Parker Drilling Company  
10560 Old Seward Highway  
Anchorage, Alaska 99515

**Name and Mailing Address of Contact Party:**  
Frank Martin  
BM Old Seward LLC  
3030 Highlands Drive  
Las Vegas, Nevada 89109

**ADEC Site Identifiers:**  
File No.: 2100.26.463  
Hazard ID.: 23848

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

**Site Description and Background**

In 1989 a total of six underground storage tanks and their associated piping and dispensers were removed at three locations on the property. Contaminated soil was excavated and disposed of off-site. The site was closed on December 2, 1996. In April 2008 sampling conducted during a Phase II

environmental site assessment found stained soils at 15 feet below ground surface at the location of a former used oil tank that was removed in 1989 (BGES, Limited Phase II Environmental Site Assessment, May 2008). This contamination appeared to have been missed during the previous cleanup work. Surface staining was also found associated with school buses parked at five locations on the western portion of the property.

### Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil and groundwater, and analyzed for (diesel range organics (DRO), residual range organics (RRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- DRO
- Chloroform
- Tetrachloroethylene (PCE)
- Trichloroethylene (TCE)
- 1,2,4-Trimethylbenzene
- 1,3,5-Trimethylbenzene
- Ethylbenzene

### Cleanup Levels

DRO, PCE, TCE, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and ethylbenzene were detected in soil above the migration to groundwater cleanup levels established in 18 AAC 75.341(d), Table B2, and chloroform and TCE were detected in groundwater above groundwater cleanup levels established in 18 AAC 75.345, Table C.

**Table 1 – Approved Cleanup Levels**

<b>Contaminant</b>	<b>Soil (mg/kg)</b>	<b>Groundwater (µg/L)</b>
DRO	250	1500
Chloroform	0.0071	2.2
PCE	0.19	41
TCE	0.011	2.8
1,2,4-Trimethylbenzene	0.61	56
1,3,5-Trimethylbenzene	0.66	60
Ethylbenzene	0.13	15

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

### **Characterization and Cleanup Activities**

In 1989, a total of six underground storage tanks (5 gasoline or diesel, and 1 used oil) and their associated piping and dispensers were removed at three locations on the property. Contaminated soil was excavated and disposed of off-site at the Anchorage Regional Landfill (gasoline/diesel soils) and treated at Alaska Pollution Control (used oil soils). Based on soil samples collected from the tank excavations all of the tank excavations met cleanup levels and a no further action letter was issued for this site on December 2, 1996.

The no further action letter noted that groundwater contamination above cleanup levels from the Mapco (now Holiday) gas station extends onto this property in the groundwater and soil/water interfaces of the shallower and deeper groundwater zones.

In April 2008, sampling conducted during a Phase II assessment found stained soils with up to 361 mg/kg DRO and 1.45 mg/kg PCE at 15 feet bgs at the location of the former used oil tank. Samples collected during the April 2008 Phase II assessment also identified surface staining contamination associated with the buses at five locations on the western portion of the property away from the former underground storage tanks. In 2009, four of the five stained areas were excavated to between 0.83 and 2.0 feet deep and 19.8 cubic yards of contaminated soil was removed and transported to Alaska Soil Recycling (ASR) for thermal treatment. A confirmation soil sample was collected at the base of each of the 4 excavations. All 4 confirmation soil samples were below soil cleanup levels. The fifth area identified as SS4 and located on the northwest corner of the property was not cleaned up. It had been covered with 3 to 4 inches of fill. When a test pit was dug in that area to try to locate the stained soils, no contamination was found during field screening.

On April 7, 2014, an estimated 7 gallons of diesel fuel was spilled in the northwest corner of the property during vehicle fueling by a mobile fuel truck. Over 5.33 cubic yards of contaminated soil was excavated and thermally treated at ASR. After the excavation activities were complete, confirmation samples collected from this area exhibited concentrations of all analytes below their respective ADEC cleanup criteria.

In July 2016, soil boring SB7 was installed and sampled at the location of the former used oil tank. The soil boring was completed as a monitoring well (BGESMW1 and alternatively named OSH-1). VOC and PAH contamination were identified as remaining in soils and VOC contamination was observed in the groundwater. TCE, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, ethylbenzene, and naphthalene exceeded the soil cleanup levels, primarily from depths between 19 and 31 feet bgs. The highest concentrations were found at the soil/groundwater interface at 26 feet bgs, where high field screening readings and a strong odor were noted. A hardpan clay with silt layer was encountered at 29 feet bgs in the soil boring.

Groundwater was sampled in BGESMW1 (also named OSH-1) on August 17, 2016, June 21, 2017, November 6, 2017, March 22, 2018, and October 29, 2019. Chloroform and trichloroethylene exceeded the ADEC groundwater cleanup levels in the November 2017 sample event. No analytes exceeded the ADEC groundwater cleanup levels in the last two sampling events.

In October 2016, eight cubic yards of contaminated soil was removed from surface stain area SS4. The excavated soil was thermally treated at ASR. Soil samples collected at the base of the excavation met soil cleanup levels.

**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.

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	All source areas of contamination have been excavated and replaced with clean fill, especially from the top two feet.
Sub-Surface Soil Contact	De Minimis Exposure	Soil contamination remained at the location of the used oil tank below 15 feet bgs.
Inhalation – Outdoor Air	De Minimis Exposure	Soil contamination remained at the location of the used oil tank, but was below 15 feet bgs.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	Remaining volatile organic compounds in the soil are found from 15 to 28 ft bgs, and are not expected to be a vapor intrusion risk in the future.
Groundwater Ingestion	De Minimis Exposure	The property has been on municipal water and sewer supply since 1996. Contaminants reached groundwater in the used oil tank area but do not currently exceed Table C cleanup levels.
Surface Water Ingestion	Pathway Incomplete	The nearest surface water is over ½ mile from the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	The site is in an area of industrial businesses and remaining contamination is deeper than 15 feet bgs.
Exposure to Ecological Receptors	Pathway Incomplete	The site is in an area of industrial businesses and remaining contamination is deeper than 15 feet bgs.

**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. Soil contamination may remain in the vicinity of SB-7/BGESMW1 that exceeds the most stringent method two soil cleanup levels below 15 ft bgs. 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 from a site that is subject to the site cleanup rules or for which a written determination from the department has been made under 18 AAC 75.380(d)(1) that allows contamination to remain at the site above method two soil cleanup levels or groundwater cleanup levels listed in Table C 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. (See attached site figure.)
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 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) 451-2911, or email at [Laura.Jacobs@alaska.gov](mailto:Laura.Jacobs@alaska.gov).

Frank Martin  
BM Old Seward LLC

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February 11, 2021

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Jacobs".

Laura Jacobs  
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit  
Jayne Martin, BGES, Inc.

