



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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DEC File No: 2100.26.075

April 19, 2023

James Cazort
Take Two, LLC.
PO Box 241551
Anchorage, AK 99524

Re: Decision Document: Tesoro – Petro Products (fka Renner’s Gas & Save)
Cleanup Complete Determination

Dear Mr. Cazort,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with the Tesoro – Petro Products (fka Renner’s Gas & Save) located at 6501 Lake Otis Parkway Anchorage, AK in Anchorage, AK. 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 Tesoro – Petro Products (fka Renner’s Gas & Save) maintained by DEC. This decision letter summarizes the site history, cleanup actions and levels, and site closure conditions that apply.

Site Name and Location:

Tesoro – Petro Products (fka Renner’s Gas & Save)
6501 Lake Otis Parkway
Anchorage, AK 99

Name and Mailing Address of Contact Party:

James Cazort
Take Two, LLC.
PO Box 241551
Anchorage, AK 99524

DEC Site Identifiers:

File No.: 2100.26.075
Hazard ID.: 23361

Regulatory Authority for Determination:

18 AAC 78 and 18 AAC 75

Site Description and Background

Petroleum contamination at the site formerly known as Renner’s Gas & Save was discovered in 1987 during construction on nearby Lake Otis Parkway. The site is 30 feet north of North Fork Little Campbell Creek.

In 2006, the site was split into two separate sites – lot 1 on the northern side of the property (ADEC file number 2100.26.076) and lot 2 on the southern side of the property (ADEC file number 2100.26.075). File #2100.26.076 was closed in 2011. This letter is in reference to lot 2 (ADEC file number 2100.26.075) at 6501 Lake Otis Parkway. Petroleum hydrocarbon contamination in soil and groundwater was caused by releases from gasoline and diesel underground storage tanks (USTs) and their associated piping.

Contaminants of Concern

Samples collected during site characterization and cleanup activities between 1987-2021 have been analyzed for diesel range organics (DROs), gasoline range organics (GROs), benzene, toluene, ethylbenzene, and total xylenes (BTEX), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs). Based on these analyses the following contaminants were detected above the applicable cleanup levels and are considered contaminants of concern (COCs) at this site:

- **DRO**
- **GRO**
- **BTEX**
- **Naphthalene**
- **1,2,4- and 1,3,5-trimethylbenzene**

Cleanup Levels

Soil cleanup levels applicable to the site are the most stringent Method 2 under 40 inch zone cleanup levels found in 18 AAC 75.341(c), Table B1, and 18 AAC 75.341(d), Table B2. Groundwater cleanup levels applicable to this site are found in 18 AAC 75.345, Table C.

Table 1 – Approved Cleanup Levels

Contaminant	Human Health - Soil (mg/kg)	Migration to Groundwater – Soil (mg/kg)	Groundwater (µg/L)
DRO	10,250	250	1,500
GRO	1,400	300	2,200
Benzene	11	0.022	4.6
Toluene	5,800	6.7	1,100
Ethylbenzene	49	0.13	15
Xylenes (total)	490	1.5	190
Naphthalene	29	0.038	1.7
1,2,4-trimethylbenzene	280	0.61	56
1,3,5-trimethylbenzene	250	0.66	60

Notes:

1. mg/kg = milligrams per kilogram
2. µg/L = micrograms per liter

Characterization and Cleanup Activities

Characterization and cleanup activities occurred at the site between 1987 and 2021. Soil and groundwater sampling and the installation of a vapor extraction system occurred prior to 1991. Sampling indicated DRO, GRO, benzene, ethyl benzene, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, toluene, and total xylenes were present above cleanup levels. The vapor extraction system operated in 1989. The nearby North Fork of Campbell Creek was also sampled in 2006 and petroleum was not detected.

The UST system that was the source of the contamination was removed in 1997. In 2003, 1,698 tons of petroleum contaminated soil was excavated and thermally treated. To further characterize the nature and extent of contamination, 15 soil borings were advanced in 2009 and approximately 2,723 cubic yards of contaminated soil was excavated and treated. Additional excavation occurred in 2010 to a depth of 16 feet below ground surface, however benzene remained above the cleanup level at the base of the excavation.

Periodic groundwater monitoring was conducted at the site from 1997 to 2021. Over the course of the monitoring effort, benzene, ethylbenzene, and total xylenes were detected above the groundwater cleanup level, however by August 2020, contaminants no longer exceeded cleanup level in groundwater which was confirmed by additional sampling in 2021. All the monitoring wells at the site have been decommissioned in accordance with DEC guidance.

Remaining Contamination

The maximum concentration of contaminants remaining at the site are all below their respective Human Health cleanup levels. Contaminants remain in soils on site above migration to groundwater cleanup levels, but groundwater has been demonstrated to no longer be contaminated.

Contaminant	Remaining Concentration in Soil (mg/kg)	Sampling date	Sample depth (feet below grade)
Benzene	7.06	September to November 2003	13
Toluene	30.9	September to November 2003	13
Ethylbenzene	12.1	September to November 2003	13
Xylenes (total)	51.1	September to November 2003	13
Naphthalene	3.46	March 2009	7.5-10
n-Propylbenzene	2.01	March 2009	7.5-10
1,2,4-trimethylbenzene	6.76	March 2009	7.5-10
1,3,5-trimethylbenzene	2.51	March 2009	7.5-10

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 (HI) of 1 across all exposure pathways. Based on a review of the environmental record, DEC 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 DEC'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

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	All contaminated surface soil was excavated to a depth of at least 2 feet.
Subsurface Soil Contact	De Minimis Exposure	A de minimis amount of contamination remains in the subsurface soil.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination remains in the subsurface below 18 AAC 75 method 2 human health and inhalation levels.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	One building remains on site. All contamination is more than 15 feet below ground surface and below human health and inhalation levels.
Groundwater Ingestion	De Minimis Exposure	Two consecutive groundwater sampling events showed all contaminants below groundwater cleanup levels.
Surface Water Ingestion	Pathway Incomplete	No surface water is present.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	Contamination does not reach North Fork Little Campbell Creek where aquatic life could be affected, as documented by the groundwater sampling results.

Notes:

1. “De Minimis Exposure” means that, in DEC’s judgment, the receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination.
2. “Pathway Incomplete” means that, in DEC’s judgment, the contamination has no potential to contact receptors.
3. “Exposure Controlled” means there is an IC in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

DEC Decision

Soil and groundwater contamination at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This site will receive a “Cleanup Complete” designation on the Contaminated Sites Database.

DEC approval is required for movement and disposal of soil and/or groundwater subject to the Site Cleanup Rules, in accordance with 18 AAC 78.600(h). Please contact DEC for information about applicable regulations and requirements. A “site”, as defined by 18 AAC 78.995, means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

Movement or use of contaminated material in an ecologically sensitive area or in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. Furthermore, 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. If, in the future, groundwater from this site is to be used for other purposes, 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 DEC from requiring additional assessment and/or cleanup action if information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

Informal Reviews and Adjudicatory Hearings

A person authorized under a provision of 18 AAC 15 may request an informal review of a contested decision by the Division Director in accordance with 18 AAC 15.185 and/or an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340. See DEC’s “Appeal a DEC Decision” web page <https://dec.alaska.gov/commish/review-guidance/> for access to the required forms and guidance on the appeal process. Please provide a courtesy copy of the adjudicatory hearing request in an electronic format to the parties required to be served under 18 AAC 15.200. Requests must be submitted no later than the deadline specified in 18 AAC 15.

If you have questions about this closure decision, please feel free to contact me at (907) 269-7553 or email at kelly.ireland@alaska.gov.

Sincerely,

Kelly Ireland
Project Manager

Cc: Nick Waldo, DEC
Bill O’Connell, DEC
DEC, Division of Spill Prevention and Response, Cost Recovery Unit