STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 150.26.006

see attached

May 16, 2005

Mr. Wendell Neff Jr.
3231 West Boone Avenue, #602
Spokane, WA 99201

Re: Healy Roadhouse, Mile 245.1 Parks Highway, Healy, Alaska
Facility ID 0404, Event ID 0975, Reckey No. 1991310000801

Dear Mr. Neff:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed review of the document entitled *Final Letter Report of Near-Surface Soil Excavation, and Excavation Closure Soil Sampling at Former Healy Roadhouse,* received on June 8, 2004. Based on the information presented in this report and data contained within the administrative case file, the ADEC has determined that soil contamination remains at the site above the most stringent 18 AAC 75.341 soil cleanup levels. However, the nature and extent of this contamination does not pose a risk to human health or the environment, and as a result, no further cleanup action is required at this time.

Please note the following information that was considered in making the determination on the environmental status of the site.

Background
In September 1990, four 4,000-gallon gasoline underground storage tanks (USTs) and a dispenser pump island were removed from the former Healy Roadhouse facility. Although no leakage was observed from the tanks or piping, contamination was evident at the fill pipes of each UST. Cleanup actions at the site consisted of the following:

- Soil excavated during the USTs removal operation was placed back into the excavation with ADEC approval. This decision was made because of concern that stockpile integrity could not be maintained in the windy conditions common in the Healy area.
- Oasis Environmental installed a Soil Vapor Extraction (SVE) system in 2002. The system ran between October 2002 and May 2004.
- Soil borings were installed in April 2004, and, based on the sampling results, 138 tons of contaminated soil were excavated and transported to the OIT thermal treatment facility in Moose Creek, Alaska. The excavation focused on surface (and near surface) contamination in a 22 foot by 16 foot area.

A Record of Decision (ROD), dated January 23, 2004, documents characterization activities, alternative cleanup levels, and previous regulatory decisions for this site.

Chemicals of Concern
Potential contaminants at this site include petroleum hydrocarbons related to the storage and distribution of gasoline from 1976 to 1990. They include: benzene, toluene, ethylbenzene, and xylenes (BTEX), 1,2-dibromoethane (1,2-DBA), 1,2-dichloroethane (1,2-DCA), gasoline range organics (GRO), and diesel range organics (DRO). Based on sampling results, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) other than those listed above, and lead were not identified as Chemicals of Concern

Exposure Pathways Identified
Complete exposure pathways may include incidental ingestion of soil particles and inhalation of ambient air. Based on the limited extent of remaining contamination and the aboveground construction of the on-site building, vapor intrusion to indoor air was not identified as a complete exposure pathway at this site and was not evaluated. The migration to groundwater pathway was evaluated but, based on the depth to the drinking water aquifer, presence of permafrost, and low permeability of subsurface soils, contaminant migration is not considered a risk at this site.

Soil Contamination
Soil samples collected following the 2004 excavation indicated approximately 10 cubic yards (cy) of contaminated soil exceeding 18 AAC 75.341 Table B1 and B2 inhalation and/or ingestion levels remained at the south end of the excavation (EX-01; see attached figure and Table 1 below). Further excavation in this area was prevented due to underground utility lines. An estimated 2 cy of soil contamination were also detected along the west and east sidewalls (EX-04, EX-05). Soil borings installed in 2001 (SB-2, SB-3) identified limited areas of contamination (above ingestion/inhalation levels) between 15 and 30 feet below ground surface (bgs); but this soil is not considered a risk via those pathways deeper than 15 feet bgs.

The following table provides the soil sample results from the 2004 excavation:

Table 1: Soil sample results exceeding cleanup levels following 2004 excavation (mg/kg)

Sample Location	Depth (feet)	Benzene	Toluene	Ethylbenzene	Xylenes	GRO	DRO	1,2-DCA	1,2-DBA
South Floor EX-01	12	**6.72**	**32.7**	**7.99**	**67.1**	**1,770**	161	NA	NA
West Sidewall EX-04	7	**17.1**	**27.6**	5.39	30	216	ND	NA	NA
East Sidewall EX-05	7	**0.539**	**9.730**	3.99	25.51	129	ND	**0.12**	**0.116**
South Sidewall EX-06	8	**18.1**	**81**	**44.7**	**700**	**2,450**	**613**	ND*	**0.633**
ADEC Cleanup Levels (ingestion/inhalation)		150/9	20,300/ 180	10,000/ 89	20,300/ 81	1400/ 1400	10,250/ 12,500	9/5	0.1/1.2

ND indicates "not detected"
NA indicates "not analyzed"
ND* indicates "not detected" but reporting limit is above the final cleanup level listed in Table 2.
Bolded values indicate concentrations exceed ADEC's migration to groundwater cleanup levels.

Groundwater Contamination
A drinking water sample collected from the on-site well in 2001 contained low levels of PAHs. The PAHs are believed to have been associated with the water distribution piping and should be monitored for drinking water standards to ensure no risk to human health. The sample results are described in the 2004 Record of Decision. The ADEC recommends periodic monitoring of the Denali RV Park drinking water well to evaluate drinking water quality with respect to petroleum contaminants.

Cleanup Levels
The cleanup levels at a site are based on human health and environmental factors, as well as, future use restrictions (e.g. off site transport of soil). The soil cleanup levels established for this site are the 18 AAC 75.341 Table B1 and B2 migration to groundwater cleanup levels.

Table 2: Cleanup Levels for Healy Roadhouse Site

Contaminant	Soil Cleanup Level (mg/kg)
Benzene	0.02
Ethylbenzene	5.5
Toluene	5.4
Xylenes (total)	78
GRO	300
DRO	250
1,2-dichoroethane	0.015
1,2-dibromoethane*	0.0000306

Cleanup level available in ADEC's Technical Memorandum 01-007, Additional Cleanup Levels, dated November 24, 2003.

ADEC Decision
ADEC has determined that the cleanup actions employed at the Healy Roadhouse were effective in removing the majority of impacted soil resulting from the former fuel system. There is a limited amount of soil contamination remaining on site above the most stringent cleanup levels, but it is not considered a risk to human health or the environment. Based on the information provided to date, ADEC will require no further remedial action at this site subject to the following conditions:

1. In accordance with 18 AAC 78.274(b), ADEC approval must be obtained prior to removal and/or disposal of soil from this site. In addition, the ADEC shall be notified prior to any excavation in the impacted area as screening for impacted material and the use of properly trained excavation personnel may be required.

2. The ADEC shall be notified prior to installation of groundwater wells at, or in the immediate vicinity of the contamination. In addition, the ADEC recommends periodic monitoring of the existing Denali RV Park drinking water well to evaluate drinking water quality with respect to petroleum contaminants.

3. The ADEC shall be notified prior to construction or reconstruction of structures that will be used for human occupation if the buildings are located above, or near, identified areas of contamination. Further evaluation of the potential for vapor intrusion may be necessary.

4. A deed notice has been filed at the Nenana Recording District regarding the location of residual contamination remaining at the site. The residual contamination will also be noted in the DEC's Leaking Underground Storage Tanks (LUST) Database.

5. In accordance with 18 AAC 78.276, additional investigation and cleanup may be required if new information is discovered which leads ADEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

6. ADEC will consider a Site Closure (and removal of institutional controls) only after the soil and/or groundwater achieves the established cleanup levels for the site.

Any person who disagrees with this decision may request an informal review by the Division Director in accordance with 18 AAC 15.185 or an adjudicatory hearing in accordance with 18 AAC 15.195- 18 AAC 15.340. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days of the decision. 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 of the decision. If a hearing is not requested within 30 days, the right to appeal is waived.

Please contact me with any questions or concerns directly at (907) 451-2127 or e-mail me at Janice_Wiegers@dec.state.ak.us.

Sincerely,

Janice Wiegers
Environmental Specialist

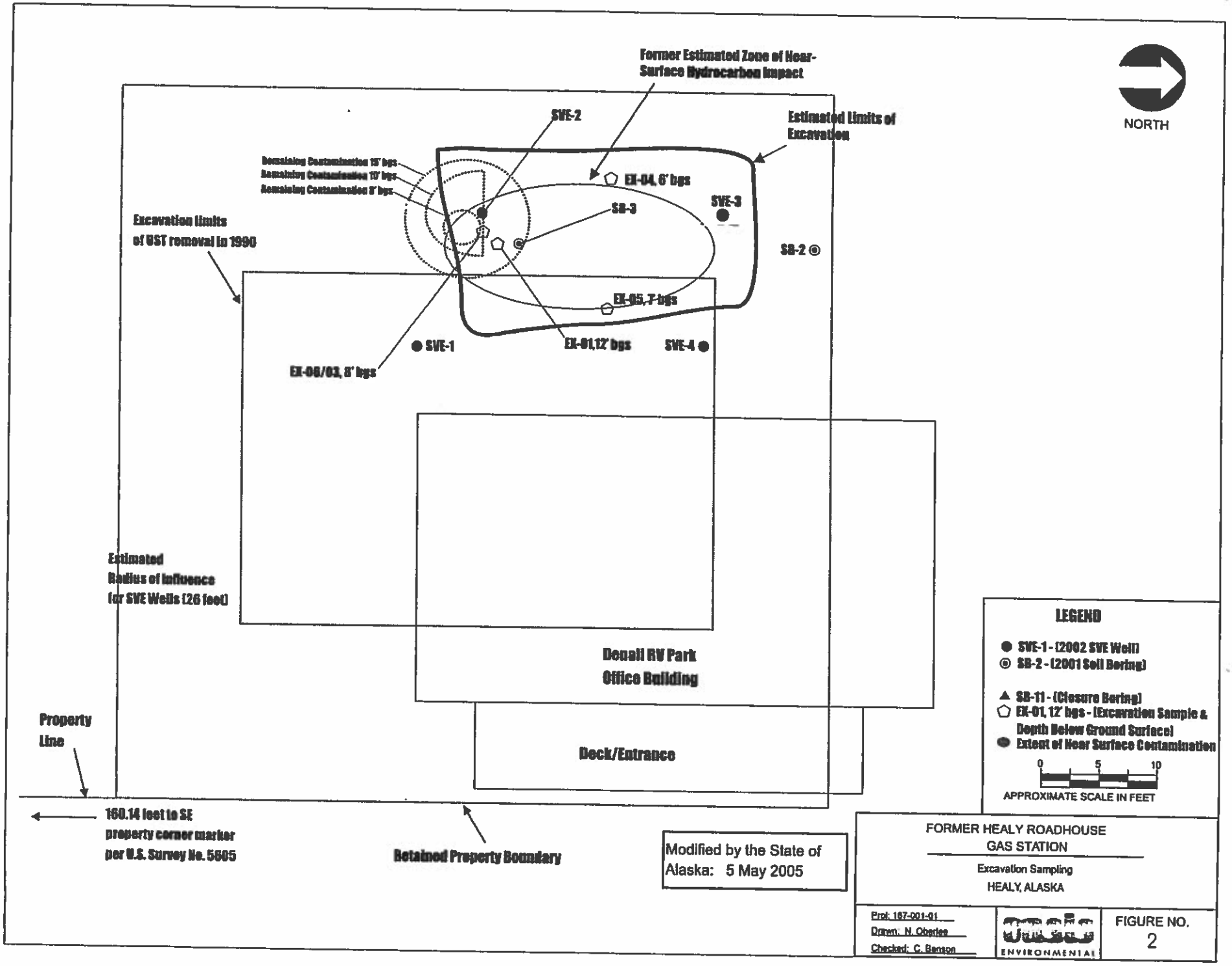
Sincerely,

Lawrence A. Johnson (for)

Jim Frechione
Environmental Conservation Manager

Enclosure

cc (w/enc.): Carl Benson, Oasis Environmental, Fairbanks


Former Estimated Zone of Near-Surface Hydrocarbon Impact
NORTH
SVE-2
Estimated Limits of Excavation
Remaining Contamination 15' bgs
Remaining Contamination 10' bgs
Remaining Contamination 8' bgs
EX-04, 6' bgs
SB-3
SVE-3
Excavation limits of UST removal in 1990
SB-2
EX-05, 7' bgs
SVE-1
EX-01,12' bgs
SVE-4
EX-06/03, 8' bgs
Estimated Radius of Influence for SVE Wells (26 feet)
Denali RV Park Office Building
Deck/Entrance
Property Line
160.14 feet to SE property corner marker per U.S. Survey No. 5805
Retained Property Boundary
LEGEND
SVE-1 - (2002 SVE Well)
SB-2 - (2001 Soil Boring)
SB-11 - (Closure Boring)
EX-01, 12' bgs - (Excavation Sample & Depth Below Ground Surface)
Extent of Near Surface Contamination
0
5
10
APPROXIMATE SCALE IN FEET
Modified by the State of Alaska: 5 May 2005
FORMER HEALY ROADHOUSE GAS STATION
Excavation Sampling
HEALY, ALASKA
Proj: 167-001-01
Drawn: N. Oberlee
Checked: C. Benson
ENVIRONMENTAL
FIGURE NO.
2

State of Alaska
Department of Enviromental Conservation
610 University Avenue
Fairbanks, AK 99709-3643

Contaminated Sites Program

MAY 16 '05
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