

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITE PROGRAM

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File No. 2100.26.149

March 2, 2005

155-139

Pepsi Cola Bottling Co. of AK., Inc.
Attn. Mr. Roger Briley
521 E 104th AVE
Anchorage, AK 99515

Re: No Further Remedial Action Planned; Pepsi Cola Warehouse, 521 E. 104th Ave.; Facility ID No. 1367, LUST Event ID No. 340, Reckey No. 1992210030802.

Dear: Mr. Briley:

The Alaska Department of Environmental Conservation (DEC) Anchorage Office has completed its review of the Pepsi Bottling Company file, including the groundwater monitoring report dated October 6, 2004, regarding releases that have occurred from regulated underground storage tanks (USTs) at the referenced site dating back to 1992. Your consultant, URS, performed groundwater sampling in fall 2004 and subsequently prepared a report which we received on October 7, 2004. Analytical samples taken during the fall 2004 monitoring event indicated that a decreasing contaminant trend is occurring in groundwater at the site. Groundwater at the site remains slightly above 18 AAC 78.345 Table C cleanup levels for benzene but the contamination that remains at the site does not pose a risk to human health or the environment and DEC has determined that no further remedial action is planned (NFRAP) at the site.

Site Summary

The site is located in a commercial and light industrial area of Anchorage located at 521 E. 104th Ave. The facility includes an office building, a warehouse used for storage and distribution of bottled soft drinks, and a truck maintenance shop. Drinking water and waste water service in the area is provided by Anchorage Waste Water Utility.

Three site assessments were performed at the site - one at the time of the removal of three USTs in 1992 and two subsequent assessments were done in 1993 and 1994. The 1993 assessment evaluated the extent contaminated soil resulting from UST releases that remained at the site. The 1994 assessment included an excavation of contaminated soil and three soil borings which were completed as monitoring wells.

Three regulated USTs were removed in September 1992: two 2,000 gallon diesel tanks and one 2,000 gallon unleaded gasoline tank. The three USTs were replaced with a 10,000 gallon double

compartment double walled UST. During the UST removal, 55 cubic yards of contaminated soil were stockpiled on site.

During the 1994 assessment and excavation, approximately 383 tons of petroleum affected soil was segregated and hauled to Fairbanks where it was thermally treated at OIT. The 1992 UST excavation stockpiled 55 cubic yards of soil that contained hydrocarbon levels above cleanup levels applicable at that time (but below current 18 AAC 75.341 Method 2 cleanup levels) and was included in the soil that was thermally treated at OIT in 1994.

Confirmation samples taken from the 1994 excavation, in the vicinity of where the USTs were located, indicated that soil was below ADEC Matrix Level B cleanup criteria applicable at that time, i.e., the maximum contaminant levels detected for GRO was 3.64 mg/Kg (100 mg/Kg), for DRO was 10.6 mg/Kg (200 mg/Kg), and for benzene was 0.467 mg/Kg (0.5 mg/Kg). Level B cleanup levels are noted in (). Benzene is the only petroleum constituent that is above the applicable current 18 AAC 75.341 Method 2 cleanup level, i.e., 0.02 mg/Kg.

Groundwater monitoring for the three monitoring wells has occurred twice yearly with some exceptions since 1995. Depth to groundwater varies from 10 feet to 22 feet below ground surface. Monitoring data over this time indicates that the contaminant plume has not migrated off of the subject property. Monitor well MW-1 has historically contained the highest concentrations of GRO and benzene (Table 1). Since 1994, GRO concentrations have decreased on a consistent basis to concentrations below current ADEC 18 AAC 75.345 Table C cleanup levels. Monitor well MW-1 remains slightly above current 18 AAC 75.345 Table C cleanup levels for benzene. DRO, toluene, ethylbenzene, and xylene(s) do not exceed current Table C cleanup levels. A trend in analytical groundwater samples taken from this site indicate that groundwater contamination is decreasing.

Table 1 Groundwater Concentrations between 1994 and 2004. Reported in mg/L

Well No.	Sample Date	Benzene	Toluene	Ethylbenzene	Xylenes
MW-1	Jan-95	10.9	10.1	0.905	3.99
	Jul-95	7.67	8.6	1.34	5.14
	May-98	0.05	0.0488	0.0361	0.0716
	Nov-02	0.00827	0.00807	0.0158	0.02814
	Jul-03	0.00179	-	-	-
	Nov-03	0.00733	-	-	-
	Feb-04	0.00876	-	-	-
	Jul-04	0.0063	-	-	-
MW-3	Jan-95	0.003	ND	ND	ND
	Jul-95	0.002	ND	ND	ND
	May-98	ND	ND	ND	ND
	Nov-02	ND	ND	ND	ND
MW-4	Jan-95	0.373	0.002	ND	0.001
	Jul-95	1.15	ND	ND	ND
	May-98	0.00122	ND	ND	ND
	Nov-02	0.000543	ND	ND	ND
Table C Cleanup Level	-	0.005	1.0	0.7	10.0

DEC Decision

The cleanup actions to date have removed three regulated USTs and confirmation samples indicate the extent of affected contaminated soil has been removed and thermally treated. The soil confirmation samples collected from the excavation area confirmed that Matrix Level B (and current 18 AAC 75.341 except benzene) migration to groundwater cleanup levels have been achieved.

The groundwater monitor data has indicated a decreasing trend in contaminant levels. Benzene remains slightly above 18 AAC 75.345 Table C cleanup levels in monitor MW-1.

Based on the information provided to date, ADEC has determined that no further remedial action is required for the site. This decision is subject to the following conditions:

1. The groundwater will be sampled in the fall of 2005 to determine water quality conditions. Annual groundwater monitoring will continue until two consecutive groundwater sampling events indicate that contamination is below Table C cleanup levels.

Once the monitoring results confirm groundwater concentrations are consistently below 18 AAC 75.345 Table C levels, then site closure may be issued provided soil meets current 18 AAC 75.341 Method 2 cleanup levels. Benzene concentrations were below the cleanup criteria in place at the time of UST closure; however, the last soil analytical data taken from the site indicates that soil exceeds the current Method 2 cleanup level for benzene. Once groundwater is verified below Table C cleanup levels, the monitor wells can be decommissioned and that may be an appropriate time to sample undisturbed soil from MW-1. It is likely that natural attenuation has reduced benzene levels in soil and if soil analytical data from samples taken at MW-1 indicates contamination in soil is below current Method 2 cleanup criteria then closure can be issued.

2. A report that can be approved by DEC and describes the sampling event(s), including but not limited to findings and summary tables of data from all sampling events, will be provided to DEC within 60 days of the sampling event(s).
3. In accordance with 18 AAC 78.274(b), ADEC approval must be obtained prior to removal and/or disposal of contaminated soil and groundwater from this site to an off-site location.

ADEC reserves the right to require additional site assessment, monitoring, remediation, and/or other necessary actions at this site if new information becomes available that indicates contamination levels are present that may pose a risk to human health or the environment. If the conditions in this decision are not met, the NFRAP status shall be revoked and additional requirements may be imposed and/or enforcement action initiated by DEC.

The NFRAP decision will also include an institutional control (IC) in the form of a note will be placed in DEC's UST database.

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

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18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's 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 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.

Cost Recovery

It should also be noted that the State of Alaska is authorized, under Federal regulation 42 U.S.C. 6991 b (h), to recover funds used during oversight of a petroleum cleanup from a leaking underground storage tank (LUST). The State is also authorized by Alaska Statute 46.08.070 to recover money expended by the department to contain or cleanup the release of oil or a hazardous substance, including petroleum.

"Oversight" costs can include department staff salaries, travel, equipment, supplies, contracts and services, and general program management. Typical cost expenditures for staff time can include, but are not limited to: performing plan reviews; drafting approval letters; attending site meetings; offering technical assistance via phone; and doing site visits or inspections.

Costs eligible for recovery include department staff salaries, travel, equipment, supplies, contracts and services, and general program management.

The responsible party may be held financially liable for these costs. Once cost recovery is initiated, you will receive a letter from the Alaska Department of Law with a detailed invoice of oversight costs and associated activities.

In summary, based on this information, the department determines that no further remedial action is planned for the site. However, institutional controls will remain in effect until such time as Pepsi Cola Bottling Co. of AK., Inc. can demonstrate that cleanup levels in the contaminated soil and groundwater concentrations are reduced to cleanup levels established in 18 AAC 75.341 and 18 AAC 75.345. This determination is subject to a future department determination that the cleanup is not protective of human health, safety, or the environment.

If you have any questions, please feel free to contact me or Eric Henry of my staff at (907) 269-3057 or e-mail him at Eric_Henry@dec.state.ak.us.

Sincerely,



Jim Frechione
Environmental Manager

cc: Eric Henry, CSP, Anchorage