

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File No. 2100.26.149

April 19, 2006

Pepsi Bottling Group Warehouse
521 East 104th Avenue
Anchorage, Alaska 99515-2612

Re: March 2006 Ground Water Sampling Event; Pepsi Cola Warehouse, 521 East 104th Avenue; Facility ID No. 1367, LUST Event ID No. 340, Reckey No. 1992210030802.

Dear Mr. Briley:

The Alaska Department of Environmental Conservation (ADEC) Anchorage Office has completed its review of the URS report *Groundwater Monitoring, Pepsi Bottling Group Warehouse, 521 East 104th Avenue, Anchorage, Alaska* dated March 16, 2006. Your consultant, URS, performed groundwater sampling on March 2, 2006 and subsequently prepared a report which we received via email on March 16, 2006.

Analytical samples were taken for benzene only during this monitoring event. Benzene is the only groundwater contaminant that has remained above ADEC 18 AAC 78.345 cleanup levels in monitoring well MW-1. Toluene, ethylbenzene, and total xylenes had previously been sampled. These three contaminants were last detected above cleanup levels in July 1995. Sampling for these three contaminants was terminated after the November 2002 sampling event because they showed a consistent downward trend below cleanup levels.

The results of the March 2006 monitoring event, 0.0034 mg/L, indicate that benzene is below the ADEC cleanup level. A duplicate sample corroborated this value with a result of 0.0032 mg/L. MW-1 was also sampled for benzene during August 2005. Results of the August 2005 sampling event for benzene in MW-1 indicated 0.00112 mg/L and 0.00115 mg/L in primary and duplicate samples, respectively. Based on these data, the conditions of the ADEC No Further Remedial Action (NFRAP) decision listed in the March 2, 2005 letter of two consecutive groundwater sampling events indicating that contamination be below 18 AAC 75.345 Table C cleanup levels for benzene (0.005 mg/L) has been met.

Since groundwater is verified below Table C cleanup levels, the monitor wells can be decommissioned. The department requests that the wells be decommissioned according to the ADEC document *Recommended Practices for Monitoring Well Design, Installation, and Decommissioning, Final, April 1992* and a report be submitted to the department within 60 days of decommissioning documenting the procedure and results.

Another condition of the NFRAP letter was that, "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." Sampling results for five samples taken on July 29, 1994 are listed in Table 3 of the Dames & Moore report *Corrective Action & Release Investigation of USTs; Former ALPAC Corporation Facility; 521 East 104th Ave; Anchorage, Alaska; Facility I.D. #1367*, dated December 1, 1994. The analytical results listed in this table indicate that the benzene concentration for all five samples varies between 0.057 to 0.467 mg/Kg (The result for Sample I.D. PE-7-13.5 is erroneously listed in Table 3 as 0.77 mg/Kg. The Laboratory Analysis Report sheet result is 0.077 mg/Kg.). Based on these data, all five samples exceed the current Method 2 cleanup level for benzene in soil of 0.02 mg/Kg.

At the time of well decommissioning it may be an appropriate time to sample undisturbed soil from near MW-1 where benzene had been detected above its current applicable 0.02 mg/Kg 18 AAC 75.341 Method 2 cleanup level. Natural attenuation over time at this location may have reduced the benzene levels below cleanup levels. If soil analytical data from samples taken at MW-1 indicates contamination in soil is below current Method 2 cleanup criteria for benzene (0.02 mg/Kg), then Site Closure can be issued. The ADEC requests a primary and duplicate soil sample be submitted for final benzene level analysis and a report submitted to ADEC describing the sampling event and provided to the ADEC within 60 days of the sampling event. If you elect to collect a soil sample from this area, a brief workplan needs to be submitted for our approval prior to sampling, which includes a figure with dimensions showing the proximity of the sampling in relation to MW-1, depth where the sample(s) will be collected and field screening methodology.

Upon submission of well decommissioning and soil sampling documentation and approval of these actions by the department, an Institutional Control Removed and a Site Closure Approved action will be placed in ADEC's UST database.

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.

In the event that analytical results of soil sampled at MW-1 do not fall below the ADEC cleanup levels, the department will continue to list the site with a NFRAP Status until such time that it can be demonstrated to the department that the soil at MW-1 location is below the ADEC benzene cleanup levels.

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.

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, you have demonstrated that benzene cleanup level concentrations in the contaminated groundwater are reduced below 18 AAC 75.345 levels at MW-1. Subsequently, groundwater monitoring wells may be decommissioned. Site Closure may be obtained once you have demonstrated that the benzene contamination level in soil at MW-1 has dropped below the ADEC 18 AAC 75.341 level and reports submitted to the department documenting the decommissioning and sampling results within 60 days of these events have been reviewed and approved by the department.

If you have any questions, please feel free to contact me by phone at 269-7546 or email at Bill_Petrik@dec.state.ak.us.

Sincerely,



Bill Petrik
Environmental Program Specialist

cc: Mark Vania, URS Corporation