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DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

File No.: 2100.26.214

August 12, 2004

Jack Thompson
The Sumiko Group
102 Montrose Court, Apt. # 2
Dothan, AL 36305

RE: Record of Decision
Air Van Lines, 2216 Post Road, Anchorage, AK
ADEC File No. 2100.26.214, Facility # 1351

Dear Mr. Thompson;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), reviewed the soil and groundwater information collected at the 2216 Post Road site, including the most recent (May 2004) groundwater monitoring results. The current information indicates that cleanup actions taken to date have been effective in reducing the risk to human health and the environment at this site and a decision document has been prepared to address its environmental status. Based on the information presented in this document, the ADEC has determined that no further remedial action is required at this site.

Please note the following information that was considered in making this determination:

Background:

Shannon & Wilson conducted the first phase of environmental assessments at this site in May 1989 following the removal of a 1,000-gallon diesel underground storage tank (UST). In March 1991, additional assessment work was conducted to characterize the nature and extent of contamination at the former tank location. These activities included 11 soil borings and installation of four groundwater monitoring wells. This was followed by periodic groundwater monitoring events over several years.

In September 1993, it was reported that contaminated soil (325 cubic yards) was excavated in proximity to the shallow water table. There was evidence that not all of the soil was removed based on a soil sample that detected 8400 mg/kg diesel range organics (DRO).

In August and September 1995, Shannon & Wilson further characterized the extent of the diesel-impacted smear zone and presented possible remedial recommendations (bioremediation feasibility test) in a letter report dated January 12, 1996.

In 1996, a soil respiration test was conducted on site that indicated bioventing might be an appropriate treatment methodology. A bioventing system was installed in 1999 to enhance the remediation of the impacted smear zone but it only operated until November 1999. It was

decided to discontinue operating the biovent system based on an evaluation of data that indicated the system was not operating effectively at low temperatures. Furthermore, it was necessary to shut down the system and allow the subsurface conditions to equilibrate so that representative natural attenuation parameters could be evaluated. The data indicated bioremediation was viable and the active treatment system was discontinued.

In the May 2001, Shannon & Wilson proposed to adopt natural attenuation as the remedial technique to address the DRO impacted smear zone. The groundwater monitoring results have detected elevated levels of DRO contamination in some wells but the most recent monitor events (October 2003 and May 2004) indicate established cleanup levels have been achieved.

Chemicals of Concern:

Chemicals of concern present at the Air Van Lines property are identified as DRO. There have been elevated concentrations of DRO detected in the soil (8400 mg/kg) and in the groundwater (26.5 mg/L).

ADEC Cleanup Levels:

The cleanup levels considered applicable to this site are established in 18 AAC 75.341 Table B2 for soil and 18 AAC 75.345 Table C for groundwater.

The soil cleanup level for DRO at this site is 250 mg/kg and 1.5 mg/L for groundwater.

ADEC Decision and Future Actions:

The subject site has been assessed and cleanup actions were employed to remove the major source(s) of contamination. The tank and impacted soil were removed to the extent practicable but there is soil contamination above the established cleanup levels remaining on site. The soil contamination is considered minimal and its location (in the smear zone) will not require further remedial action based on the groundwater monitor results.

The ADEC reviewed the past two groundwater monitoring events (October 2003 and May 2004) and determined that the decreasing trend in contaminant concentrations warrants no further remedial action status at this site. This decision is conditional on the following:

1. The groundwater monitoring wells (B7MW, B8MW, and B22MW) shall be decommissioned in accordance with 18 AAC 75.345 (i). These wells are no longer required and are located in areas that may serve as conduits for surface contamination to migrate to groundwater. Therefore, you are requested to decommission the wells in accordance with the Department's Recommended Practices for Monitoring Well Design, Installation and Decommissioning, dated April 1992.
2. A down gradient monitor well (located outside the area of heavy traffic and use) shall be installed to monitor groundwater quality at the site. This condition shall remain in place until soil cleanup levels are achieved and/or the ADEC determines there is no longer a risk to groundwater quality.

3. A groundwater monitoring plan that identifies the wells to be sampled and when; frequency of sampling; and parameters to sample shall be submitted to the ADEC for approval.
4. If future information indicates the hazardous substance contamination poses a risk to human health or the environment, then additional investigative and/or cleanup action may be required.
5. The transport of soil or groundwater from this site requires prior ADEC approval in accordance with 18 AAC 75.325(i)
6. An institutional control (established on the ADEC database) will identify the nature and extent of contamination remaining on site. This information is intended to inform any future owners/operators of the environmental status of the property so they are aware of environmental and/or safety requirements.

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, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the ADEC'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 ADEC 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 any questions or wish to discuss this decision document, please contact me at (907)269-7658.

Sincerely,

Jim Frechione
Environmental Manager

cc: Stafford Glashan, Shannon & Wilson