

RECORD OF DECISION
for the portion of the
Prescott Equipment-2774 Rampart Drive Site owned by Prescott Equipment Company

July 12, 2004

Site name and location

Prescott Equipment-Rampart Drive contaminated site (hereinafter the "Site") is located at and near 2774 Rampart Drive in Anchorage. The portion of the site subject to this Record of Decision (ROD) is more particularly described as: Lot 9, Block 3, First Addition Alaska Industrial Subdivision in Anchorage (hereinafter the "Subject Lot").

Name and mailing address of property owner

Prescott Equipment Company
c/o Ms. Mary Jane Henrickson, President
2938 Princeton Way
Anchorage, AK 99508

CS file number

File Number: 2100.38.088 (formerly L100.252), Spill # 2001210928401

Regulatory authority

Site Cleanup Rules under 18 AAC 18 AAC 75.325 - 18 AAC 75.390

Site Map

A copy of the Site map including the estimated boundary of the trichloroethylene (TCE) contaminant plume (by concentration at each monitoring well for TCE, and for GRO, DRO and RRO at some wells) is attached.

Physical characteristics of site

The Subject Lot is located in an industrial/commercial section of Anchorage in Mountain View between Mountain View Drive and Rampart Drive. All of the surrounding properties are businesses that range in storage of vehicles for the military personnel, or a sign/paint shop, or car dealership. The Prescott Equipment-Rampart Drive and Municipality of Anchorage adjacent properties' parking lots are unpaved.

Two primary groundwater aquifers are known to exist in this area. The upper aquifer is unconfined and is mainly a locally continuous sheet of outwash sediments varying from 10 feet to 50 feet in thickness. The lower aquifer is confined and consists of interfingered sands, gravels, and tills that thin and merge with the upper aquifer materials near the Chugach mountain front to the east. The intervening confining unit is a continuous layer of clay and silt known locally as the Bootlegger Cove Formation. This unit grades eastward to tills and till-like deposits and pinches out near the mountain front.

The upper unconfined aquifer appears to flow generally toward the west to northwest until it flows into Ship Creek. However, there is a northeast to southwest trending groundwater divide

between Ship Creek (northwest) and Chester Creek (southeast) drainages. The exact location of the groundwater divide is unknown but is believed to be somewhere in the vicinity of Fifth Avenue (Glenn Highway) as the groundwater flow at the Merrill Field Airport and landfill is southwesterly towards the Chester Creek drainage.

Shannon and Wilson indicated local groundwater flow to be in a westerly direction on the 2839 Mountain View Drive property but because the wells were located in a linear pattern the validity of this interpretation is uncertain.

Contaminants of Concern

Trichloroethylene (TCE) contamination has been detected above its 18 AAC 75 Table C cleanup level of 0.005 mg/L. TCE has been detected in soil that is above the applicable 18 AAC 75 Method 2 cleanup level, i.e., 0.027 mg/kg for the migration to groundwater pathway in the under 40 inch precipitation zone, at monitoring well (MW) 6. GRO, DRO and RRO has been detected in soil and groundwater but below the applicable Method 2 and Table C cleanup levels. TCE contamination in the soil was detected on site and the adjacent lot owned by the MOA which is referred to as the Army National Guard (AKANG) Mountain View Armory contaminated site.

The AKANG site also has been investigated and the TCE plume is under that property as well. The AKANG had leased the property from the Municipality of Anchorage. Further information on the properties history is described below. The AKARNG property is referred below as the AKANG Mountain View Armory property, or former AKANG Mountain View Armory property.

Since the TCE contamination has been detected at the interface with the groundwater on the two sites at about 40 feet below ground surface (bgs), as depicted on the attached map, it appears that the contamination originated from or near the northern portion of the property boundary of the Subject Lot and the formerly leased AKANG Mountain View Armory property.

A Phase I and II Environmental Site Assessment by GeoEngineers in 2001 reported two large areas with surface petroleum staining on the property but the Phase II report noted that samples collected indicated that DRO and RRO levels were below applicable ADEC cleanup levels. The Phase II report also reported high measurements using a photo ionizing detector (PID) in one area (TP-5) indicating that other volatile organic compounds may be present. Sampling by Oasis in this area in 2003 for VOCs did not show any detections above applicable cleanup levels. Oasis also did not report observing any surface soil staining in the areas previously identified in the GeoEngineers' reports.

Current and expected future land use

Currently the Subject Lot is privately owned by Prescott Equipment and is a gravel surface vacant lot. Mary Jane Henrickson is the President of Prescott Equipment and is the point of contact for Prescott Equipment. The property has been up for sale by Prescott Equipment for the past several years. Future use is expected to be commercial/industrial. The Subject Lot and surrounding area is zoned for commercial purposes.

Determination of current and expected future use of groundwater

Currently the shallow aquifer is not used as a source of drinking water for Prescott Equipment or nearby property owners. A formal 18 AAC 75.350 determination has not been made regarding its future use, but a qualitative decision based on DEC experience and knowledge of local groundwater allow an interim decision that it is unlikely to be used as a drinking water source. This is based on quality and quantity issues associated with its shallow depth and the availability of quality groundwater at depth in the confined aquifer system. There is also a public water system in the area that could provide water to the site. A well survey performed by Oasis in 2003 shows that properties within ¼ mile radius of the site are not on private wells and if they have water, would be connected to the MOA public water system.

Even though the shallow groundwater may not be a drinking water source, it will be evaluated for its potential to be a contaminant transport mechanism. The shallow groundwater aquifer has been periodically monitored since 1991 and it has consistently exceeded the 18 AAC 75.345 Table C level for TCE. In order to restrict future use of the shallow groundwater, DEC will attach an institutional control to prevent future use of the untreated water in the shallow aquifer.

Currently, no water is provided to the Subject Lot. It is expected that if water is provided to the Subject Lot, it will be through the MOA public water system.

Completed Exposure Pathways

The exposure pathways evaluated under this decision include migration to groundwater, ingestion, dermal contact, and inhalation. The pathway to the deeper confined groundwater aquifer is not considered complete due to the thick Bootlegger Cove formation. This assumption must be confirmed by drinking water samples and compliance with established 18 AAC 75 and 18 AAC 80 standards. Also, this decision considered the groundwater as a transport mechanism however it appears that the contaminant plume is relatively stable or is decreasing, and there are no known receptors down-gradient, e.g., drinking water wells or connection to surface water bodies.

Soil: Currently the inhalation, dermal contact and ingestion pathways are complete. However, there is no known soil contamination exceeding 18 AAC 75 cleanup levels for these pathways.

It is possible that contamination could be detected if more comprehensive sampling or excavation occurs.

If excavation occurs, the inhalation of contaminants, dermal contact and ingestion is a possibility and these pathways need to be evaluated.

Soil has been detected at MW-6 at the groundwater interface that exceeds the migration to groundwater pathway. This indicates that the contamination has migrated from an up-gradient source. Because of the relatively flat groundwater gradient in this area, the contamination could have also migrated cross-gradient through diffusion.

Groundwater: The migration to groundwater pathway could be considered complete – at least in the shallow unconfined aquifer. The unconfined aquifer can be considered as a drinking water source. There is also a deeper confined aquifer. Currently the inhalation pathway from vapor migration from groundwater via soil pore spaces is complete but because of the low TCE levels and the depth to groundwater, there is little risk for exposure.

SITE BACKGROUND HISTORY

The Subject Lot is presently a 1.88 acre vacant gravel lot. In a Phase I Environmental Site Assessment, GeoEngineers, reported that the Site was undeveloped prior to 1959; the AKANG Mountain View Armory occupied the Site from 1960 through 1970, using it mostly for vehicle storage; and aerial photos indicated that the current property line between the Subject Lot and the armory lot was established between 1970 and 1975. From 1975 to 1995 the Subject Lot was used by Prescott Equipment for storage of steel pipe. Prescott Equipment purchased the Subject Lot from the Municipality of Anchorage in approximately 1995.

Adjacent to the Subject Lot is the former AKARN Mountain View Armory contaminated parcel located at 2839 Mountain View Drive (Lot 10, Block 3, First Addition Alaska Industrial Subdivision in Anchorage). The Municipality of Anchorage (MOA) Maintenance and Sign Facility currently occupies the tract. The tract is a level yard with two main onsite building structures. The MOA is the current owner of the property, which is approximately 2.65 acres in size and is fenced. The area surrounding the two main buildings has been paved, but the rest of the yard has a gravel cover. The property was cleared during the summer of 1950 and the building closest to Mountain View Drive was constructed during the fall of 1950. The AKANG occupied the property on June 5, 1954, with a lease from the MOA. The MOA did not occupy the property prior to leasing it to the AKANG. During this time, the AKANG used the property as a support maintenance shop, transportation motor pool, state area command, and armory. In the fall of 1996, MOA moved a sign and paint shop into the buildings on this tract.

Site Investigations

Subject Lot

GeoEngineers performed Phase I and Phase II Environmental Site Assessments at the Subject Lot in 2001. Key findings from these reports are summarized below.

- Trichloroethylene (TCE) was detected in groundwater from two temporary wells (B-2 and B-3) at the Subject Lot as shown on Figure 1. TCE was not detected in a third temporary well B-1.
- The former Prescott Equipment property at 467 W. Chipperfield Drive has a moderate potential for subsurface contamination migrating to the Subject Lot property due to a leaking oil collection tank, transformers and known PCB contamination.
- The AKANG Mountain View Armory has a moderate potential for contributing subsurface contamination based on three underground storage tanks (USTs) removed from this property.
- The Sisters Construction (Industrial Wood Products at 429 Industrial Way) property had one 500-gallon leaking UST removed that has moderate potential for contaminant migration to the site.
- Surface soil staining at two areas of the site did not have GRO/BTEX, DRO or RRO concentrations above applicable ADEC cleanup levels.
- Fill material containing wood and steel debris was encountered at TP-4 that is within the alleged former dump area (Figure 2); however no debris was reported in the other test pits inside the alleged former dump area.
- Two test pit samples (TP-5 and TP-9) having the highest field screening values were analyzed for GRO/BTEX, HVOC, and PCB. Analytical results for these samples were below the detection limit (HVOC and PCB) or less than applicable ADEC cleanup levels.

AlaskChem Engineering performed two soil gas surveys of the Subject Lot and former AKARN Mountain View Drive Armory lot during May and June 2003. The soil gas investigation used a photo ionization detector (PID) and GASTEC tubes that are specific to TCE to analyze the soil vapors. Round 1 of the investigation observed no indications of TCE. Round 2 of the investigation detected TCE vapor concentrations of up to 13 ppm in an area along the eastern property line of both properties. Access to the adjacent property Anchorage Vehicle Processing (AP Logistics, LLC) at 2945 Mountain View Drive had not been granted at this time. The source of the TCE vapor plume could not be identified due to property constraints.

In fall 2003, Oasis Environmental, Inc. on behalf of the ADEC, performed a groundwater investigation in the vicinity of the Subject Lot and former AKARN Mountain View Drive Armory lot. The purpose was to determine the extent of the groundwater contamination and if possible, identify the source(s) of the contamination. Six monitoring wells were installed and soil samples collected from the borings. Access was denied to install a monitoring well at the Anchorage Vehicle Processing property owned by AP Logistics, LLC at 2945 Mountain View Drive. An up gradient monitoring well was installed to the north of the Anchorage Vehicle Processing property.

Oasis determined the following:

- Four soil samples (two from MW-5, one from MW-6, and one from MW-9) contained detectable concentration of TCE. Soil samples MW5-38 and MW6-35 were collected from near the groundwater interface in borings MW-5 and MW-6, respectively. These samples contained 0.39 mg/kg and 0.473 mg/kg TCE, respectively, which is above the ADEC cleanup level of 0.027 mg/kg. Soil sample MW9-40, that was collected from just below the groundwater level, contained 0.0237 mg/kg TCE which is below the ADEC cleanup level. Soil sample MW5-45 which was collected approximately five feet below the groundwater level contained 0.0142 mg/kg TCE.
- Oasis concluded that all of the soil related TCE contamination was located within or near the saturated aquifer materials and thus appears to be related to TCE-impacted groundwater.
- All groundwater sample results for GRO, DRO, RRO, and PCB analyses were below the laboratory reporting limit with the exception of the duplicate sample from MW-8. This groundwater sample (MW-8-D) contained detectable levels of GRO at a concentration of 0.151 mg/L. One groundwater sample (MW-8) and its duplicate (MW-8-D) contained detectable levels of BTEX constituents. The primary sample contained 0.00116 mg/L of toluene; and the duplicate sample contained 0.00042 mg/L of benzene and 0.00178 mg/L of toluene. All of these results are below their applicable ADEC cleanup levels.
- Three of the six monitoring wells sampled (MW-5, MW-6, and MW-9) contained detectable concentration of TCE (Figure 5). Two of the wells (MW-5 and MW-6) that are located in the alleged dump area that may be a source of contamination area had the highest TCE concentrations. The TCE concentrations in MW-5 and MW-6 were 0.0403 mg/L and 0.00687 mg/L, respectively, which are above the ADEC cleanup level of 0.005 mg/L. The groundwater sample from MW-9, located downgradient of the suspected source area, contained 0.00344 mg/L TCE which is below the ADEC cleanup level.

- Results of the investigation indicated a localized groundwater flow direction in the area between MWs 2, 3, 5 and 6. The general flow direction in the area was toward the west to northwest.

AKARN Mountain View Armory Property

Ogden Environmental performed a Phase I Environmental Baseline Survey of the AKANG property at 2839 Mountain View Drive during February 1997. Golder Associates followed this with a limited Phase II Site Assessment in April 1998. The Phase I survey identified 16 areas of concern relating to potential environmental site impacts. The AKANG industrial shop operations included vehicle maintenance and repair, and equipment and vehicle washing. Hazardous and non-hazardous wastes were generated at the site during this time including waste oils and fuels, grease, spent solvents, hydraulic fluid, polychlorinated biphenyls (PCBs), and other types of waste. An alleged dumping area where old truck parts and tires were buried was reported to be in the northwest quadrant of the property that also covered portions of the property at 2774 Rampart Drive. The Phase II Site Assessment provided for a subsurface investigation at four of the areas of concern. Petroleum hydrocarbon and PCB contamination were identified during these investigations.

Since October 1996, the MOA Maintenance and Sign Facility has occupied the onsite buildings. Operations include vehicle maintenance, sign painting, and administrative duties. Petroleum, oil, and lubricants (POL), paint, toluene, and other solvents are all used and stored at the site.

Shannon and Wilson (S&W) performed a Site Investigation at the AKARN Mountain View Armory site during December 1999. One groundwater well (MW-1) was placed on the northwestern border of the 2839 Mountain View Drive property boundary by S&W and sampled. No petroleum hydrocarbons or BTEX were detected in the groundwater sample collected at this time. On March 15, 2002 a groundwater sample was collected and analyzed for VOCs from MW-1. No VOCs were detected in the MW-1 groundwater sample.

Shannon and Wilson performed additional Site Investigation activities at the 2839 Mountain View Drive property during October 2002. Three monitoring wells (MW-2, MW-3, and MW-4) were installed and sampled under this site assessment. Key findings from this report are summarized below.

- Static groundwater levels were measured at approximately 36 to 37 feet below ground surface (bgs) in all three wells. The local groundwater flow direction was interpreted to flow toward the west with an average gradient of about 0.0005 ft/ft. Note that the validity of this information is limited, because these four monitoring wells (MW-1 to MW-4) were all located in a linear fashion (see Figure 2).

- TCE was detected in two soil samples from soil borings MW-2 and MW-3 that were collected at 35 to 37 feet bgs at concentrations of 1.47 mg/kg and 0.329 mg/kg, respectively.
- Soil sample collected from above the water table in MW-3 and MW-4 had no detectable VOC concentrations even though PID readings were above background levels at the MW-3 soil sample depth (5 – 7 feet bgs).
- TCE was detected in groundwater samples from monitoring wells MW-2 and MW-3 at concentrations of 0.12 mg/L and 0.176 mg/L, respectively.
- No other VOCs were detected in either of the MW-2 and MW-3 groundwater samples and no VOCs were detected in the MW-4 groundwater sample.

Anchorage Vehicle Processing (AP Logistics, LLC)

Hart Crowser performed a Phase I Environmental Site Assessment of the 2945 Mountain View Drive property owned by AP Logistics, LLC in December 2000. This property is approximately 1.7 acres in size of which the majority is fenced and approximately half is paved. The property was operated as a mobile home sales lot from 1968 through 1982. Knik Building Supply operated a retail building products store on the property from 1982 until 1998. From 1998 to 2001 the property was used by ABC Motorhome and Car Rentals for secured motor home parking and offsite material storage.

The Phase I Environmental Site Assessment did not find any significant causes for concern regarding environmental contamination of this property. They did discover several unserviceable lead-acid batteries and a used oil storage area with some surface staining at the time of their site inspection.

CLEANUP ACTIONS

No known cleanup actions have been performed at the Subject Lot. Some removal of solid waste has evidently occurred. However, there is the possibility some solid waste may be buried on the Subject Lot.

CLEANUP LEVELS

The soil cleanup levels established for this Site are the 18 AAC 75.341 Method 2 concentrations for the under 40 inch precipitation zone, migration to groundwater pathway. The groundwater cleanup levels for this Site are the 18 AAC 75.345 Table C levels for the contaminants of concern.

ADEC DECISION

Based on the information provided to date, ADEC has determined that while contaminant concentrations still exceed applicable 18 AAC 75.341 soil and 18 AAC 75.345 Table C groundwater cleanup levels, the Subject Lot poses no significant risk to human health or the environment. This determination considered that there is no current exposure by humans to the inhalation, dermal contact, ingestion pathways, and that the contaminant plume appears to be stable, and no drinking water wells have been impacted by the contamination. While no further remedial action planned (NFRAP) is applicable for the Subject Lot, it is subject to the following regulatory requirements:

1. If the soil above the applicable 18 AAC 75.341 Method 2 cleanup levels becomes accessible in the future (for example through excavation or soil drilling), or if future information indicates the contamination poses a risk to human health or the environment, then additional investigative or cleanup action may be required. Limited soil testing has been performed throughout the site. The known areas that have contained TCE contamination above the Method 2 cleanup levels are in the areas of: MW-6. Soil contamination was detected at the groundwater interface at MW-6. It is likely that soil contamination at about 35-40 ft. bgs exceeds applicable Method 2 cleanup level for TCE in the area shown on Figure 5. Any excavation conducted that reaches a depth of 25 bgs or deeper needs to be performed with a work plan preapproved by ADEC. If contamination above applicable ADEC cleanup levels is detected, i.e., wherever it is detected on the Subject Lot, it must be reported to ADEC pursuant to applicable regulations. Upon such a report to ADEC, further excavation may be required after ADEC approval of a work plan to be submitted by the impartial qualified third party on behalf of the property owner.

Similarly, if any groundwater above the applicable 18 AAC 75.345 Table C cleanup levels is generated in the future, it will need to be managed properly and further investigative or cleanup action may be required if the contamination poses a risk to human health or the environment, e.g., contamination is shown to be migrating towards a drinking water well. Past and recent groundwater monitoring has shown that groundwater has/is contaminated above TCE in the locations of monitoring wells: B-2, B-3 and MW-6, as well as MWs 2, 3 and 5 on the adjacent former AKANG Mountain View Armory contaminated property.

2. The transport, treatment and/or disposal of contaminated soil and groundwater from the Subject Lot requires prior ADEC approval in accordance with 18 AAC 75.325(i)(1) and (2). Any use of the groundwater from the unconfined aquifer at the Subject Lot requires the approval from DEC because of the contamination. According to 18 AAC 75.990, a site is an area that is contaminated, including areas contaminated by the migration of a

contaminant from a source area, regardless of property ownership. Data indicates that contamination has migrated from an unknown source(s) near the northern property boundaries of the Subject Lot and former AKANG Mountain View Armory property onto those properties and adjacent properties.

3. A groundwater monitoring plan that includes monitoring for monitoring wells 2, 3, 4, 5, 6, 7, 8, 9, and 10 shall be prepared and submitted to ADEC for review and approval; if none is submitted, ADEC may, at its election, perform the work itself and seek cost recovery from any appropriate party. Sampling will occur in September of 2004 and once every other year (bi-yearly) after that time, e.g., September 2006. Groundwater samples will need to be analyzed for VOC constituents using EPA Method 8260. If future information shows that other contaminants are present, the list of contaminants to be sampled may be increased such as for DRO. The plan needs to specify that all monitoring wells will be surveyed (to ensure frost heaving is not an issue) and a report will be received by ADEC within 60 days of the sampling events. The reports will need to include analytical data from the ADEC approved laboratory; results; discussion of results in comparison to past findings including trend(s) in groundwater contaminant concentrations; summary tables of groundwater data collected to date; figure of site and applicable features such as monitoring wells; groundwater elevations, gradient and flow direction, survey information; conclusions and recommendations. Sampling events must occur in September.

A reduced monitoring frequency to once every five years is possible after the 2006 sampling event. The monitoring report for the September 2006 event needs to provide information, including discussion on the decreasing trend(s) observed which is demonstrated by statistics, to justify whether a reduced monitoring frequency should be proposed for the next bi-yearly sampling event. Monitoring wells selected for periodic sampling frequency could be increased by ADEC to semi-yearly if the findings show that levels are increasing at specific locations. Groundwater monitoring will need to occur until the site consistently meets applicable 18 AAC 75 Table C cleanup levels. A revised groundwater monitoring plan needs to be submitted and approved by ADEC in June of each year if a sampling year, unless there is no proposed deviation from the existing approved monitoring plan.

4. Access be granted by the owner(s) of the Subject Lot to ADEC or its consultant or to a potentially responsible party (PRP) that is allowed by ADEC to inspect and to sample the groundwater monitoring wells currently on the Subject Lot, i.e., MWs 6 and 7. If the monitoring wells are negatively impacted, the owner(s) of the subject lot will need to repair them and or replace them under a plan approved by ADEC. No work shall be performed on the monitoring wells until the plan is approved by ADEC. Inspections/sampling of monitoring wells shall be performed at reasonable hours and at

least three working days advance notice will be given to the owner(s) by ADEC or its designee prior to accessing the Subject Lot.

The owner(s) is required to provide a current phone number to ADEC and name of the owner(s) or his designee where the owner(s) or his/her designee can be reached Mondays – Fridays 8:00 a.m. through 4:30 p.m. if ADEC or its designee needs to schedule an inspection/sampling event.

5. Any plan to install a drinking water well on the Subject Lot must be approved by ADEC's Drinking Water Program and Contaminated Sites Program, and/or the MOA. If a drinking water well is installed in the shallow aquifer, it must be sampled for VOCs using EPA Method 524.2 on a yearly basis. If a drinking water well is installed in the deeper aquifer (beginning approximately 100-150 feet bgs) which is below the clay/silt Bootlegger Cove Formation, it may be used as a drinking water source if it is sampled (for DRO, GRO, BTEX, volatile organic compounds, bacteria and nitrates) and achieves 18 AAC 75 cleanup levels and 18 AAC 80 drinking water standards. A report of the findings from this sampling effort must be provided to Rich Sundet of CSP and to Ms. Heather Newman of DEC's Drinking Water Program at DEC's 555 Cordova Street office.
6. An institutional control will be placed on the Subject Lot that must remain in effect until such time that the owner demonstrates that any remaining VOCs, including TCE, has been cleaned up to cleanup levels established in 18 AAC 75 Method 2 and Table C.

The attached "Notice of Environmental Groundwater Contamination" will need to be recorded on the Subject Lot deed as an institution control measure in accordance to 18 AAC 75.375(b)(3). In addition, a statement will be included in the DEC database for this site as a form of an IC measure that existing TCE remains on and off the Subject Lot above applicable 18 AAC 75 Method 2 and Table C cleanup levels.

This determination is also subject to additional investigation and/or cleanup action if future information indicates that the cleanup is not protective of human health, safety or welfare, or the environment. If the conditions in the Notice of Environmental Groundwater Contamination are not met, the NFRAP status shall be revoked and additional requirements may be imposed and/or enforcement action initiated by DEC.

This decision should in no way constitute any construed relief from legal action by third party property owners whose property adjacent to the site has been negatively impacted by the contaminant plume migrating off the Subject Lot. Property owners adjacent to the Subject Lot who may be impacted by the contamination emanating from the subject property, need to address the contamination in accordance to 18 AAC 75 regulations such as reporting and obtain ADEC approval as required by any applicable regulations.

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 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.

ADEC Site Remediation Section Manager Approval:

Jim Frechione, Environmental Conservation Manager

Date