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DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

File: 102.26.039

September 28, 2005

Jerry Sadler
Airport Equipment Rentals Inc.
P.O. Box 72578
Fairbanks, AK 99707-2578

Re: Former K & W Trucking Facility
Leaking Underground Storage Tank (LUST) site
Event ID: 1012

Dear Mr. Sadler:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), reviewed the Shannon & Wilson, Inc. Corrective Action Summary Report (dated January 1994) for the former K & W Trucking Facility leaking underground storage tank (LUST) site located at 1310 Van Horn Road in Fairbanks, Alaska. Based on the information provided in the report, ADEC has determined that soil contamination remains at the site above the most stringent 18 AAC 75.341 cleanup levels but the nature and extent of the contamination do not pose a risk to human health or the environment. As a result, no further remedial action will be required at this site, subject to site specific conditions listed in this decision document.

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

Site Background
In August 1991, three underground storage tanks (USTs) and a dispensing island were excavated and removed from the K & W Trucking Facility at 1310 Van Horn Road in Fairbanks, Alaska. The three tanks, located east of the building, consisted of a 10,000-gallon diesel tank, a 5,000-gallon gasoline tank and a 5,000-gallon heating fuel tank.

During the excavation of the USTs, petroleum hydrocarbons were encountered. Contaminated soil above the water table was excavated and stored on site in a containment cell. There was also contaminated soil beneath the water table that was not excavated.

A soil boring was drilled and completed as a monitoring well (MW-1) to assess the extent of contamination underlying the concrete driveway adjacent to the west side of the excavation. Soil samples were collected from 5 to 6.5, 7.5 to 9 and 10 to 11.5 feet below ground surface (bgs) and analyzed for diesel range petroleum hydrocarbons (DRPH), gasoline range petroleum hydrocarbons

(GRPH), and aromatic volatile organics. The analytical results of the soil samples were below detection limits and the groundwater sample results from the monitoring well were below detection limits for benzene, toluene, ethylbenzene, and xylene (BTEX) compounds and total petroleum hydrocarbons (TPH).

The groundwater samples collected from the excavation were reported to contain 33 parts per billion (ppb) benzene, 34 ppb toluene, 40 ppb ethylbenzene, and 62 ppb total xylenes.

In November 1991, Shannon & Wilson returned to the site and excavated additional soil. They were able to remove the contaminated soils at the base of the excavation following an approximate 1.5-foot drop in the groundwater level. The excavated soil was placed within the existing contaminated soil stockpile on site. The confirmation soil samples collected from the excavation indicated the southern half of the excavation achieved ADEC cleanup levels but the northern half had residual contamination remaining. The excavation was then backfilled with clean gravel and two 20-foot lengths of 4-inch, slotted PVC piping were installed horizontally in the excavation at a depth of 7.5 feet bgs to passively treat any residual soil contamination remaining there. In addition, monitoring well MW-2 was installed north of the excavation approximately 13 feet bgs.

The on-site drinking water well located approximately 10 feet from the tanks was sampled for BTEX and the results were non-detect in 1991. The depth of the drinking water well was estimated to be more than 50 feet bgs.

In January 1992, two additional monitoring wells (MW-3 and MW-4) were installed northwest of the UST excavation in the inferred downgradient direction. All soil analyses, except one, from the monitoring wells were below ADEC cleanup levels. The sample from 10 feet bgs in MW-4, located adjacent to the building, detected diesel range organic (DRO) contamination at 280 parts per million (ppm). Groundwater samples collected from MW-3 and MW-4 were below ADEC cleanup levels for BTEX.

In 1993, an additional monitoring/air injection well (MW-5) was installed in the former UST excavation. Soil samples collected from 11 to 12.5 feet bgs detected 160 to 1,700 ppm DRO with trace amounts of gasoline range organics (GRO) and BTEX. The groundwater samples collected from MW-1, MW-2, MW-3, and MW-4 were all below ADEC cleanup levels.

In 1994, a blower mechanism was connected to MW-5 to inject air into the saturated soils below the base of the former UST excavation. The blower was connected to a timer that limited the operation to 5 hours per day. Groundwater samples collected in May 1994 from MW-3 and MW-5, and May and October 1994 from MW-1, MW-2, and MW-4 were all below ADEC cleanup levels.

<u>Landspread soil:</u>
The stockpile (300 cubic yards) of contaminated soil was landspread on-site. The soil samples collected from the treated soil did not detect GRO and BTEX and DRO ranged from 14 to 120 ppm. The two soil samples collected below the landspread soil did not detect contamination above ADEC cleanup levels.

Exposure Pathways Evaluated
The site is now used for commercial / industrial purposes as an equipment storage and/or maintenance facility by the Airport Equipment Rental Company. The exposure pathways evaluated in this decision document include migration to groundwater, ingestion, and inhalation.

All pathways are considered complete at the site and will be evaluated to determine possible risk to human health or the environment.

Cleanup Levels
The soil cleanup levels established for this site are the 18 AAC 75.341 Tables B1 and B2 Method Two, "under 40 inch zone" migration to groundwater levels. The groundwater cleanup levels are the 18 AAC 75.345 Table C levels.

The contaminant of concern identified at the site is DRO and the applicable soil cleanup level established is 250 ppm.

ADEC Decision
The cleanup actions at this site have resulted in the removal of the USTs and approximately 300 cubic yards of contaminated soil. The excavated soil was treated (landspread) on-site and achieved site cleanup levels. There was residual DRO soil contamination (up to 1,700 ppm) identified in the tank excavation area approximately 11 to 12.5 feet bgs but it was limited in extent and has not impacted groundwater to date. The groundwater was monitored in 1991, 1992, 1993, and twice in 1994 with no contamination detected above the ADEC cleanup levels.

Based on the information provided to date, ADEC has determined that the cleanup actions employed at the former K & W Trucking LUST site were effective in removing the major source(s) of the contamination. There is residual soil contamination remaining in the ground above the migration to groundwater cleanup level but below the ingestion and inhalation levels established for the site. The residual soil contamination remaining at this site does not pose a risk to human health or the environment provided site specific conditions and/or controls are attached to the property.

ADEC will require no further remedial action at this site subject to the following conditions:

1. An Institutional Control will be added to the ADEC LUST Database identifying the nature and extent of contamination remaining on site.
2. In accordance with 18 AAC 78.274(b), ADEC approval will be obtained prior to removal and/or disposal of soil or groundwater from this site to an offsite location.
3. In accordance with 18 AAC 78.276(f)(2), ADEC reserves the right to require additional site assessment, monitoring, remediation, and/or other actions at this facility should new information become available that indicates contamination at this site may pose a risk to human health or safety, or the environment.
4. ADEC will consider a Site Closure (and removal of institutional controls) only after the soil meets the established cleanup levels for the site.

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 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.

If you have any questions, please contact Deborah Williams at (907) 451-5174 or via email at Deborah_Williams@dec.state.ak.us.

Sincerely,

Deborah Williams
Environmental Program Specialist

Sincerely,

Jim Frechione
Environmental Program Manager