

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File: 2100.26.025

March 5, 2008

Bruce Anthony
Environmental Director
Holiday Companies
4567 American Boulevard West
Minneapolis, Minnesota 55437

Re: ADEC Record of Decision
Holiday Station Store No. 610-1500 East 5th Ave, Anchorage, Alaska

Dear Mr. Anthony:

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program reviewed the assessment and cleanup records associated with the Holiday Station Store (HSS) No.610 (former Williams Express Store No.5010) located at 1500 East 5th Avenue in Anchorage. This site had been contaminated by the release of a hazardous substance; however, based on the information provided to date, the hazardous substance contamination has been adequately addressed and does not pose an unacceptable risk to human health or the environment. Therefore, ADEC has determined that no further remedial action is required, and that Holiday Station Store No. 610 can be closed subject to the conditions outlined in this document.

This decision is based on the administrative record for this site which is located in the offices of the Alaska Department of Environmental Conservation (ADEC) in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the ADEC determination.

Introduction

Site name and location:

Holiday Station Store (HSS) No. 610 (formerly Williams Express No. 5010)
1500 East 5th Avenue
Anchorage, Alaska.

Name and mailing address of contact person:

Mr. Bruce Anthony
Environmental Director
Holiday Companies
4567 American Boulevard West
Minneapolis, Minnesota 55437

Database Record Key and CS file number:

ADEC Reckey No: 1989210024901 and 2001210011601
CS File No: 2100.26.025
UST Facility ID No. 1512

Regulatory authority under which the site is being cleaned up:

18 AAC 78 and 18 AAC 75

Background

HSS 610 is an active fueling station which utilizes five underground storage tanks (USTs) that were installed in 1989; four of which are 10,000-gallon tanks and one is a 12,000-gallon tank. The original USTs at this location included one 5,000-gallon diesel tank, two 12,000-gallon gasoline tanks, and one 250 to 300-gallon heating oil tank. These were removed during the 1989 upgrade. An additional, original 300-gallon heating oil tank was removed in 2002.

A variety of operators have occupied the site including Toppers Oil Co, Mapco Express, and Williams Express.

The on-site source of petroleum hydrocarbons at HSS No. 610 is the former USTs and associated piping and dispensers. Discrete releases have occurred at this site in 1992, 2000, and 2001. Potential off-site sources include a former service station to the north at 1515 East 5th Avenue, a former fuel company to the northeast at 1525 East 5th Avenue, and Alaska Sales and Service, Inc. to the west at 1246 and 1300 East 5th Avenue.

Soil

Soil borings advanced near the pump island during a 1987 site assessment found concentrations up to 160 mg/kg benzene, 1,300 mg/kg toluene, 396 mg/kg ethylbenzene, and 2,100 mg/kg xylenes. Following the 1989 store upgrade, ten soil borings were sampled during 1989 and 1990 site assessments. Concentrations up to 2,900 mg/kg total petroleum hydrocarbons (TPH) as gasoline, 1,900 mg/kg TPH as diesel, and 1.6 mg/kg benzene were found in the former pump island and former UST areas. Other BTEX compounds were also detected above the Method 2 migration to groundwater cleanup levels these areas. Three of the ten borings were advanced for offsite monitoring well installation and included benzene concentrations up to 0.09 mg/kg.

Following a 2000 tank upgrade and limited removal action, concentrations of up to 23,000 mg/kg gasoline range organics (GRO), 943 mg/kg benzene, and 7,814 mg/kg total BTEX remained in the soil impractical to remove from the active tank area. Based on sampling, the extent of contamination was found to be limited and passive vent piping was installed in this area. Another limited removal action was conducted in 2001 in response to the observation of

surface staining on an adjacent property and a sample containing 299 mg/kg diesel range organics (DRO) was collected from beneath the active diesel dispenser. This contamination was also found to be limited in extent based on other sample results.

In 2002 a heating oil tank was removed and a confirmation samples contained 0.038 mg/kg benzene. Confirmation samples did not contain other hydrocarbons greater than Table B1, Method Two, "Migration to Groundwater" cleanup levels.

Groundwater

Groundwater monitoring has been ongoing at HSS 610 from 1990 to the present. Benzene and DRO have been the primary contaminants of concern in groundwater at this site, with the highest concentrations of benzene being reported from MW-5. The next highest concentrations have been reported in MW-4, the offsite well located approximately 50 feet west of a former fuel dispenser island at 1515 East 5th Avenue. The former fuel islands at this location are visible in historical aerial photographs from 1961, 1970, and 1980.

Concentrations of benzene and DRO have decreased and appear to have reached equilibrium over the period of remediation and monitoring. For example, benzene concentrations at MW-5 were initially detected at 18.2 mg/L in 1990 but were reduced to 0.0047 mg/L when last sampled in 1994. Benzene concentrations in MW-4 were initially detected at 0.52 mg/L on 9/13/1990. These benzene concentrations decreased to 0.00850 mg/L on 3/30/2007 and 0.111 mg/L on 09/21/2007. Benzene concentrations at MW-1 were initially 13.0 mg/L in 1990, but by 2007 had decreased to 0.132 mg/L.

Free product was observed in 1990 and 1991 in MW-5 which was located in the middle of 5th Avenue. This well is now paved over and abandoned. While free product has not been observed in the other groundwater monitoring wells associated with the site or since 1991, a sheen has been observed on water recovered from MW-1, MW-4, MW-5, and SVX-2 from time to time in the past. However, the last observation of sheen was in 1999 at MW-1.

Municipal Production Well No. 3 is located approximately 900 feet north of HSS 610. According to AWWU, there have been no known water quality problems at Municipal Production Well No. 3. There are three private wells nearly 0.5-mile to the northwest. Hart Crowser conducted a water well survey during 1989/1990 and discovered no active water wells within a 0.25-mile radius to the south, and a 0.5- mile radius to the northwest.

Remedial Actions

In addition to several limited removal actions, remedial actions at HSS 610 have included a vapor extraction system (VES), a groundwater pump and treat system (P&T), and an air injection system (AIS). The VES was installed at the site in 1990, the P&T system in 1992, and the (AIS) installed in 1995 to replace the P&T system. Hydrocarbon recovery decreased during the systems' operational history with consistently low recoveries obtained starting around March 2001. Following shut down of the VES and AIS systems in October 2003, a rebound test was conducted. Subsequent vapor and groundwater sampling has not indicated a rebound effect at this site.

Chemicals of Concern

The contaminants of concern identified at this site are:
Benzene, Toluene, Ethylbenzene and Xylenes (BTEX)
Gasoline Range Organics (GRO)
Diesel Range Organics (DRO)

Cleanup Levels

The soil cleanup levels for this site are established in 18 AAC 75.341 Tables B1 and B2, Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
DRO	250
GRO	300
Benzene	0.02
Toluene	5.4
Ethylbenzene	5.5
Total Xylenes	78

The groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
DRO	1.5
GRO	1.3
Benzene	0.005
Toluene	1.0
Ethylbenzene	0.7
Total Xylenes	10.0

Exposure Pathways Identified

The exposure pathways for human health that were evaluated include the following: inhalation and ingestion of soil and groundwater and dermal contact with soil.

Both the inhalation and ingestion of soil pathways may be complete, but the exposure risk is considered acceptable. The paved surface will limit any potential exposure via these pathways and the site is located in a commercial area.

Dermal contact with contaminated soil is only a complete pathway for construction workers, as the site is paved, and contaminated soil is not available to typical receptors at the site such as employees and customers.

The ingestion of groundwater pathway may be complete, however it does not pose an unacceptable risk because there are currently no on-site drinking water wells and community water service is available. Municipal Production Well No. 3 is located approximately 900 feet to the northeast of HSS No. 610. MW-3 was positioned between HSS 610 and the municipal

well and had been sampled from 1990 thru 1998. BTEX results from this monitoring well were consistently below cleanup levels and were nondetect since 1992. Sampling of MW-3 ceased when it could no longer be located.

The exposure pathway analysis above was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be one of the following: De Minimus Exposure, Exposure Controlled, or Pathway Incomplete.

ADEC Decision

ADEC has determined that the cleanup actions employed at the HSS No. 610 facility were effective in removing a majority of the contaminant source material. The UST system was upgraded to prevent further releases, much of the contaminated soil was excavated, and an air sparge/vapor extraction system was installed and operated for several years. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment and no further remedial action is required at HSS No. 610.

This determination is subject to the following conditions:

1. An institutional control will be recorded on the ADEC database that identifies the nature and extent of the contamination remaining on the site.
2. ADEC approval is required prior to off site transport of soil or groundwater in accordance with 18 AAC 78.274(b).
3. The aboveground components of the remediation system, the vapor extraction wells, and the air sparge wells shall be decommissioned in accordance with accepted practices and a work plan approved by ADEC.
4. Samples shall be collected from MW-1, MW-2, SVX-2, and MW-4 and analyzed for BTEX according to the approved ADEC plan in the spring of 2008. Status of future monitoring will be determined after the results of the next monitoring event are available.
5. Any monitoring wells that are not needed for future monitoring shall be decommissioned in accordance with an ADEC approved work plan.
6. Groundwater wells will not be installed on this property without prior approval from ADEC.
7. A deed notice (Notice of Environmental Contamination) shall be recorded in the State Recorder's Office that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document. A copy of the recorded notice shall be provided to ADEC within thirty (30) days of its recordation.

This determination is also subject to 18 AAC 78.276 (f) whereby additional investigation and cleanup may be required if new information is discovered that indicates the cleanup described in this decision is not protective of human health or the environment.

Site closure (without conditions) will be considered when sampling confirms that soil and groundwater meet the 18 AAC 75 cleanup levels established for this site.

Appeal

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 reviewable under this section. 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.

If you have questions about this closure decision, please contact Keather McLoone at (907) 269-7526.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Frechione".

Jim Frechione
Environmental Manager

Cc: Mr. Matt Hemry, S&W
Attach: Deed Notice

Holiday Alaska, Inc. agrees to the terms of this conditional closure as discussed above:

Bruce Anthony
Environmental Director
Holiday Companies

Notice of Environmental Contamination

Pursuant to 18 AAC 78.280(d), Holiday Alaska, Inc., as the responsible party of the subject property, hereby provides public notice that the property located at 1500 East 5th Avenue, Anchorage, Alaska, has been subject to the release(s) of hazardous substances. The legal description is the North 200 feet of Block 11, East Addition to the Original Townsite of Anchorage.

This site has been subject to a discharge or release and subsequent cleanup of oil and other hazardous substances, regulated under 18 AAC 75 as amended through December 2006; and 18 AAC 78 amended as of October 2006. The soil at the subject property is primarily contaminated with petroleum hydrocarbons, including benzene, toluene, ethylbenzene and xylene (BTEX), gasoline range organics (GRO), and diesel range organics (DRO), at concentrations greater than the applicable ADEC cleanup levels.

The release and site cleanup is documented in the Alaska Department of Environmental Conservation (ADEC) underground storage tank database under the following reference numbers:

ADEC Facility ID #1512

ADEC Event ID #106 and #2679

ADEC Record Key (Reckey) Nos. 1989210024901 and 2001210011601

ADEC File No. 2100.26.025

In accordance with 18 AAC 78.276(f)(1), the ADEC reviewed and approved, subject to institutional controls and additional conditions, the cleanup actions as being protective of human health, safety, welfare, and the environment. There is soil contamination remaining on site at concentrations greater than established cleanup levels, but additional cleanup action is not required because the contamination does not pose an unacceptable risk to human health, public safety, welfare, or the environment.

In the event that information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator is required under 18 AAC 75.300 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations. Further site characterization and cleanup may be necessary under 18 AAC 75.325-.390 and 18 AAC 78.600. Also, any transport, treatment, or disposal of any potentially contaminated soil or water from the site or use of the groundwater at or near the contaminated area requires notification to and approval from the Department in accordance with 18 AAC 78.600(h).

Attached are diagrams drawn to scale that show the property boundary of the Holiday Station Store #610 facility, local groundwater flow direction, and current groundwater monitoring wells.

This notice remains in effect until a written determination from ADEC is recorded that states that the soil and groundwater at the site has been shown to meet the migration to groundwater soil cleanup levels in 18 AAC 75.341 Tables B1 and B2, and the 18 AAC 75.345 Table C groundwater levels.

Please return original copy of this notice to the address below:

Holiday Alaska, Inc.:

Signature: _____
Printed Name: _____
Mailing Address: _____

(seal)

Subscribed and sworn to before me this ____ day of
_____, 2008.

Notary Public in and for the State of _____
My commission expires: _____

Note: Please refer to 11 AAC 05.010 (a)(14) for the required fee. The information requested on this form should be typed or legibly printed in English. Any attachments or exhibits must not exceed 8.5" x 14". This form is intended to comply with the recording requirements of AS 40.17.030 and 11 AAC 06.040.