

# STATE OF ALASKA

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

**SARAH PALIN, GOVERNOR**

RECEIVED

555 Cordova Street  
Anchorage, AK 99501  
PHONE: (907) 269-3057  
FAX: (907) 269-7649  
www.dec.state.ak.us

DEC 10 2007

File: 2100.26.017

December 5, 2007

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

Re: Holiday Station Store No. 601  
ADEC Record of Decision

Dear Mr. Anthony:

The Alaska Department of Environmental Conservation, Contaminated Sites Program, (ADEC) reviewed the assessment and cleanup records associated with the Holiday Station Store (HSS) No.601 located at 1405 Bragaw Street in Anchorage. Based on ADEC's review and the information presented in this letter, it has been determined that no further remedial action is required at this site and the site can be conditionally closed. The following is a summary of the regulatory issues associated with this facility and ADEC's determination regarding its environmental status.

**Introduction**

Site name and location:

Holiday Station Store (HSS) No. 601  
1405 Bragaw Street  
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: 1990210004006  
CS File No: 2100.26.017  
UST Facility ID No. 1496

Regulatory authority under which the site is being cleaned up:  
18 AAC 78 and 18 AAC 75.

### **Background**

HSS 601 is an active fueling station which utilizes one 15,000-gallon and two 10,000-gallon underground storage tanks (USTs) that were installed in 1991. The original USTs at this location included one 6,000-gallon gasoline/diesel tank and two 10,000-gallon gasoline tanks which were removed during the 1991 upgrade.

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

The source of petroleum hydrocarbons at HSS No. 601 is the former USTs and associated piping and dispensers. Other potential off site sources exist to the north of the property.

### **Soil**

Soil borings advanced near the pump island during a 1987 site assessment found benzene concentrations up to 3.6 mg/kg, above the ADEC Method Two Table B1 Migration to Groundwater cleanup level of 0.02 mg/kg. In 1990 six soil borings were sampled and benzene was again detected above the Table B1 cleanup level.

In 1991 and 1992, the USTs and dispenser island were removed. During the UST removal, petroleum impacted soil was encountered resulting in the excavation of 500 cubic yards (cy) of soil which was stockpiled onsite. Some of the stockpiled soil was used to backfill the excavation, the rest remained onsite and was used to backfill the excavation at the dispenser island. The most heavily contaminated soil from the UST and dispenser excavations was transported to another affiliated site, the former Williams Express 5002, for treatment.

Another limited removal action occurred in 2000, when 30 – 40 cy of petroleum impacted soil were excavated and transported to Alaska Soil Recycling for treatment. Confirmation samples collected following excavation contained gasoline range organics (GRO) up to 400 mg/kg, above the ADEC Table B1 cleanup level of 300 mg/kg. Additional soil samples collected during installation of monitoring and remediation system wells contained benzene up to 0.83 mg/kg, above the ADEC Table B1 cleanup level of 0.02 mg/kg.

### **Groundwater**

Groundwater monitoring has been ongoing at HSS 601 since 1987 when benzene was detected at 1.6 mg/L, above the ADEC Table C cleanup level of 0.005 mg/L. Benzene has been the primary contaminant of concern in groundwater at this site, with concentrations up to 8.9 mg/L detected in samples from monitoring well MW-3 in 1997.

Groundwater monitoring conducted at HSS 601 both at the site and at offsite downgradient monitoring wells has failed to detect contaminants above ADEC Table C cleanup levels since 2003, when benzene was detected in MW-12 at 0.0130 mg/L. The most recent monitoring event conducted in May 2007 did not detect contaminants in any of the wells sampled

### **Remedial Actions**

A vapor extraction system was installed at the site in 1991 along with a groundwater pump and treat system. The pump and treat system was replaced by an air injection system in 2001 which consisted of 12 air sparge wells. This combined system was operated in continuous or pulse mode from 2001 to 2005.

Following a trend of limited vapor recovery, the system was shut down in 2005 to conduct a rebound test. 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

GRO

### **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>
Gasoline Range Organics (GRO)	300
Benzene	0.02

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>
Gasoline Range Organics	1.3
Benzene	0.005

### **Exposure Pathways Identified**

The exposure pathways for human health that were evaluated include the following: ingestion of soil and groundwater, indoor and outdoor inhalation, and dermal contact with soil. The inhalation and ingestion exposure risk is acceptable as these pathways are only complete for a construction worker at the site. The site is paved, and contaminated soil is not available to typical receptors at the site such as employees and customers. The indoor and outdoor inhalation pathways are complete, but the pavement over the contaminated area acts as a cap, minimizing exposure via these pathways.

Water well surveys of the area indicate no potable wells within 1,000 feet of the site. The closest active drinking water well is approximately 1,650 feet away and is located cross-gradient from the site, so while the groundwater ingestion pathway is complete, there are no potential receptors.

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 either De Minimus Exposure or Pathway Incomplete.

### **ADEC Decision**

ADEC has determined that the cleanup actions employed at the HSS No. 601 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. 601.

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. In addition the attached "Notice of Environmental Cleanup and Residual Soil and Groundwater Contamination" shall be recorded on the property deed. These will serve as notification to future owners/operators of the property of the environmental status of the site and any conditions that apply to future management of contamination. A copy of the recorded notice shall be provided to ADEC within thirty (30) days of its recordation.
2. ADEC shall be notified prior to off site transport of soil 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. Any monitoring wells that are not needed for future monitoring shall be decommissioned in accordance with an ADEC approved work plan.
5. Groundwater wells will not be installed on this property without prior approval from ADEC.

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

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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.

Please sign and return this Conditional Closure for our files and if you have questions about this closure decision, please contact Bill O'Connell at (907) 269-3057.

Sincerely,



Jim Frechione  
Environmental Manager

Holiday Alaska, Inc. agrees to the terms of this Conditional Closure as stated above.



Lynn M. Anderson  
Assistant Secretary  
Holiday Alaska, Inc.

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

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