

STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

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File: 2100.26.033

Certified Mail Return Receipt Requested
7007 0710 0004 3852 8895

April 10, 2008

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

Re: ADEC Record of Decision
Holiday Station Store No. 631, formerly Williams Express Store #5031

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.631 located at 283 Muldoon 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. 631 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. 631, formerly Williams Express Store No. 5031
283 Muldoon
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: 2003210007002
CS File No: 2100.26.033
UST Facility ID No. 2885
Event ID # 2906

Regulatory authority under which the site is being cleaned up:

18 AAC 78 and 18 AAC 75

Background

Prior to 1990, the location had been residential property which may have utilized heating oil tanks. HSS 631 is currently an active fueling station with five underground storage tanks (USTs) that were installed in 1992 as follows: four 10,000-gallon gasoline tanks and one 15,000-gallon diesel tank. Other operators that have occupied the site are Mapco Express and Williams Express.

The on-site source of petroleum hydrocarbons at HSS No. 631 is the current UST array. Potential off-site sources include a downgradient Tesoro station to the west and a home heating oil tank upgradient to the east.

Soil

A site investigation conducted prior to commercial development of HSS 631 indicated the presence of diesel fuel in soil based on olfactory observations and soil samples. A soil sample collected near the surface contained 1,400 mg/kg total petroleum hydrocarbons (TPH). The suspected source of the shallow contamination was oiling of the soil prior to installation of asphalt. Another sample, collected from the 10 to 11.5 foot below ground surface (bgs) interval, contained 210 mg/kg TPH but was nondetect for benzene, toluene, ethylbenzene, and xylenes (BTEX).

Soil samples collected during the 2003 installation of the first monitoring well, contained benzene concentrations of 0.064 and 0.051 mg/kg; however, these samples were nondetect for toluene, ethylbenzene, and xylenes, as well as gasoline range organics (GRO) and diesel range organics (DRO). One soil sample collected during the 2004 installation of additional monitoring wells contained 0.0264 mg/kg benzene; all other soil samples collected contained BTEX, DRO, and GRO below Method Two migration to groundwater cleanup levels.

Groundwater

Groundwater monitoring has been ongoing at HSS 631 from 2003 to the present. GRO and benzene are the primary contaminants of concern at this site. GRO and benzene concentrations

have been nondetect in three of the four onsite monitoring wells since late 2005 or earlier. At the fourth well, MW-1, GRO concentrations have been below Table C cleanup levels since late 2004. Benzene concentrations at MW-1 have been below Table C levels in four of the last five sampling events; the last exceedance was during the September 2006 event. In summary, all four wells were less than Table C cleanup levels during the last two sampling events.

Remedial Actions

Remedial action at the site has been limited to hand excavation in the area of the tank overflow buckets.

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 because remaining soil concentrations do not exceed ingestion or

inhalation levels in 18 AAC 75.341 Table B2. Further, 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 a complete pathway for construction workers only, 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. A water well survey of the area indicated one private, downgradient well 450 feet northwest at 7801 Peck Avenue. However, three downgradient, onsite monitoring wells have been nondetect for benzene and GRO the last two years, and site data indicates that offsite migration of contamination is not occurring.

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 action employed at the HSS No. 631 facility were effective in removing a majority of the contaminant source material. 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. 631.

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" will need to 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.
2. ADEC approval is required prior to off site transport of soil or groundwater in accordance with 18 AAC 78.274(b).
3. Further ground water monitoring will not be required, and existing monitoring wells shall be decommissioned in accordance with an ADEC approved work plan
4. Groundwater wells will not be installed on this property without prior approval from ADEC.
5. 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.

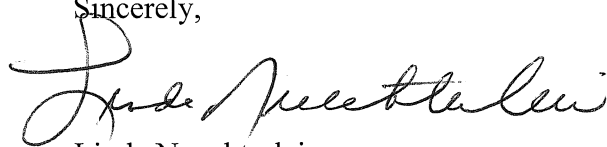
Site closure (without conditions) will be considered when sampling confirms that soil and groundwater meet the 18 AAC 75 cleanup levels established for this site.

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,



Linda Nuechterlein
Environmental Manager

cc: Mr. Matt Hemry, S&W
Attachment: 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 a responsible party of the subject property, hereby provides public notice that the property located at 285 Muldoon Road, Anchorage, Alaska, has been subject to the release(s) of hazardous substances. The legal description is Lot 1A of the Proctor Subdivision.

This site has been subject to a discharge or release and subsequent cleanup of oil and other hazardous substances, regulated under 18 AAC 75, Article 3, as amended December 2006; and 18 AAC 78, Article 6, as amended October 2006. The soil at the subject property is primarily contaminated with petroleum hydrocarbons, including benzene and gasoline range organics (GRO), 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 #2885
ADEC Event ID #2906
ADEC Reckey No. 2003210007002
ADEC File No. 2100.26.033

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 is a diagram drawn to scale that shows the property boundary of the Holiday Station Store #631 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 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.

