

STATE OF ALASKA

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

SARAH PALIN, GOVERNOR

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File: 2265.26.030

April 7, 2009

Amir Azimi-Tabrizi
3312 Madison Way
Anchorage, AK 99508

Re: **Record of Decision**; Former Wet Willy's Car Wash
Corrective Action Complete Determination.

Dear Mr. Azimi-Tabrizi:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with Former Wet Willy's Car Wash located at 1900 Palmer-Wasilla Hwy, Wasilla, Alaska. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

This decision is based on the administrative record for Former Wet Willy's Car Wash, 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 Corrective Action Complete Determination.

Introduction

Site Name and Location:

Former Wet Willy's Car Wash
1900 Palmer-Wasilla Hwy, Wasilla, Alaska 99654
Tract F, Block 1, Cottonwood Creek Mall Subdivision, Wasilla, Alaska

Name and Mailing Address of Contact Party:

Amir Azimi-Tabrizi
3312 Madison Way
Anchorage, AK 99508

Database Record Key and File Number:

File: 2265.26.030
Hazard ID: 25176

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

Background

Wet Willy's was a combination car wash and gasoline station that operated from 1984 to 2007. The site is located on approximately 1 acre in Wasilla along the Palmer Wasilla Highway. The property is connected to the City of Wasilla public water systems. In 2007, the facility changed ownership and is currently the Soft Touch Express car wash. In June 2007, four underground storage tanks (USTs), (i.e. two 12,000-gallon gasoline USTs, a 5,000-gallon gasoline UST, and a 5,000-gallon diesel UST), dispensers, and associated piping were decommissioned. No visual or olfactory evidence of a release was observed except for 1.3 cubic yards of contaminated soil that was excavated near a dispenser and placed in a super sack. The super sack was reportedly transported to Alaska Soil Recycling for thermal treatment; however, ADEC has not found documentation that this occurred. Confirmation soil samples were taken at the piping trench, beneath the dispensers, and at the depths of the excavation at 12-16 feet below ground surface (bgs). Soil samples collected at this site have been tested for: diesel range organics (DRO); gasoline range organics (GRO); and benzene, toluene, ethylbenzene and xylene (BTEX).

Characterization Activities

During the June 2007 tank removal, Environmental Management Inc. evaluated the levels of contaminants in soil in accordance with 18 AAC 78 regulations. About 1.3 cubic yards of contaminated soil was excavated from near a dispenser that showed elevated readings on a photoionizing detector (PID). After the removal of the 1.3 cubic yards, a total of 25 locations within the excavation pit and underneath former dispensers and piping were field screened with a photoionizing detector. Fourteen (i.e. 13 primary and one duplicate) confirmation samples were collected from locations which exhibited elevated headspace readings and were analyzed for DRO, GRO, and BTEX. GRO was not detected; DRO was detected at a maximum value of 22.7 mg/kg; and BTEX was not detected in the confirmation samples.

No visual or olfactory evidence of a release was observed except for 1.3 cubic yards of contaminated soil that was excavated near a dispenser and placed in a super sack. One soil sample was collected from the 1.3 cubic yards of soil in the super sack and analyzed for DRO, GRO, and BTEX. In this sample, DRO was detected at level of 1,630 mg/kg. No other contaminant was detected above 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater values. This soil was reportedly treated at Alaska Soil and Recycling in Anchorage.

Groundwater was not detected during the excavation activities and was suspected as being at around 20 feet below ground surface based upon a review of groundwater monitoring reports for an adjacent contaminated site located at 1595 East Parks Highway, Wasilla, Alaska.

Cleanup Levels

The soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
Benzene	0.025
GRO	300
DRO	250

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

<u>Contaminant</u>	<u>Site Cleanup Level (mg/L)</u>
Benzene	0.005
GRO	1.3
DRO	1.5

Pathway Evaluation

The exposure pathways for human health and the environment that were evaluated include the following: direct contact with soil; outdoor inhalation of vapors, and groundwater ingestion. The direct contact with soil and outdoor inhalation of vapors pathways may be complete but the remaining contaminant concentrations do not exceed the Method Two "Ingestion" or "Inhalation" levels in Tables B1 and B2 established in 18 AAC 75.341. The groundwater ingestion pathway is not believed to be complete since soil was determined to not be contaminated at roughly 12 feet bgs and groundwater is estimated to be 20 feet bgs.

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 De Minimis Exposure, or Pathway Incomplete.

ADEC Decision

Following ADEC's review of EMI's "Underground Storage Tank Site Assessment & Removal/Closure Report" dated July, 2007, ADEC has determined no further assessment or cleanup action is required. The levels of contaminants of concern detected in soil do not exceed ADEC's most stringent cleanup levels established in 18 AAC 75.341 Tables B1 and B2. Groundwater is not believed to be impacted since soil was determined to be clean beneath the UST at 12 feet bgs and groundwater is estimated to be 20 feet bgs in this area. Therefore, there is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.600(h). This letter does not serve as your approval for future off-site movement and disposal of soil associated with this release. It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

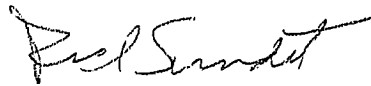
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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 the ADEC project manager, Todd Blessing at (907) 269-7699.

Sincerely,



Rich Sundet
Environmental Manager

cc: Don Dougherty, EMI Inc.