

STATE OF ALASKA

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

SEAN PARNELL, GOVERNOR

555 Cordova Street
Anchorage, AK 99501
PHONE: (907) 269-7526
FAX: (907) 269-7649
www.dec.state.ak.us

File: 2107.26.001
Certified Return Receipt
Article No: 7007 3020 0000 1948 3907

August 19, 2009

Bruce Anthony
Environmental Director
Holiday Alaska, Inc.
4567 American Boulevard West
Minneapolis, Minnesota 55437

Re: Record of Decision (ROD);
Holiday Station Store 616/Williams Express Store #5016
Corrective Action Complete Determination-Institutional Controls

Dear Ms. Brown:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Holiday Station Store 616/Williams Express Store #5016 located at 12021 Old Glenn Highway in Eagle River. 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 will be required as long as the site is in compliance with established institutional controls.

This decision is based on the administrative record for the Holiday Station Store 616/Williams Express Store #5016 site, which is located in the offices of the 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 with ICs determination.

Introduction

Site Name and Location:

Holiday Station Store 616/Williams Express Store #5016
12021 Old Glenn Highway
Eagle River, Alaska 99577

Name and Mailing Address of Contact Party:

Bruce Anthony, Environmental Director
Holiday Alaska, Inc.
4567 American Boulevard West
Minneapolis, Minnesota 55437

Database Record Key and File Number:

ADEC Reckey: 1995210009001
File: 2107.26.001
Hazard ID: 24581

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

Background

Records show that Mapco Express, Inc. purchased this property in 1988 from United Lumber Company (United), the same year of the first documented use of the property as a filling station. Documentation of ownership prior to United's, or the length of ownership by United has not been locatable to date.

The potential onsite sources are former and active Underground Storage Tanks (USTs) as well as associated piping and dispensers. Potential offsite sources include a former Quick Stop located 700 feet to the east and current Tesoro filling station located 300 feet to the east. Both of these facilities are located upgradient from the site.

Soil samples collected at this site have been tested for benzene, toluene, ethylbenzene, and xylenes (BTEX), gasoline range organics (GRO), lead, and total petroleum hydrocarbons (TPH). Groundwater samples collected at the site have been tested for BTEX, GRO, and methyl tert-butyl ether (MTBE).

Contaminants of Concern

- Gasoline Range Organics (GRO)
- Benzene
- Methyl tert-butyl ether (MTBE)

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2 Under 40 inch Zone, Migration to Groundwater.

<u>Contaminant</u>	<u>Site Cleanup Level (mg/kg)</u>
• Gasoline Range Organics	300
• Benzene	0.025
• Methyl tert-butyl ether	1.3

The default 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>
• Gasoline Range Organics	1.3
• Benzene	0.005
• Methyl tert-butyl ether	0.47

Site Characterization and Cleanup Actions

Site assessment work was conducted in 1991 with three borings advanced and one sample from each boring submitted to the laboratory from each. Benzene was found at 0.06 mg/kg in B1 collected from the 12.5 to 14 feet below ground surface (bgs) interval. The other sample results were less than the most stringent cleanup levels.

A UST closure of the three gasoline tanks and assessment was performed in 1995 in which soil was excavated in the former tank area. This soil was returned to the excavation and a vapor extraction system (VES) installed. Soil samples collected during this effort contained GRO up to 19,000 mg/kg and benzene up to 530 mg/kg. The highest concentrations were found in the pump island areas. Monitoring well B1MW was installed to assess the pump island area. The VES included a line placed in the former tank excavation and four lines in the former pump island areas. This system operated from October 1995 until September 1998 in a continuous operation mode and was then operated in pulse mode for ten more years. After showing generally decreasing trends in stack emissions, a rebound test was conducted. Measurements of soil vapors showed a slight rebound during one of the sampling events but the groundwater concentrations did not also increase.

Additional characterization was conducted during 1998 and 2000 including soil borings that were completed as monitoring wells B2MW and B3MW. Four soil samples were analyzed by the laboratory as part of that effort with only benzene in one sample above most conservative Method Two criteria at 0.06 mg/kg.

Groundwater monitoring has taken place since 1995, 1998, and 2000 in wells B1MW, B2MW, and B3MW respectively. Downgradient wells B1MW and B2MW have had past GRO, benzene, or MTBE exceedances of current Table C levels. GRO and benzene concentrations have been below current Table C levels in all three wells since 2002. MTBE concentrations have exceeded current Table C levels but show a decreasing overall trend with concentrations in B2MW down from 3.1 mg/L in 2000.

Pathway Evaluation

The exposure pathways for human health that were evaluated include the following: ingestion (Table B2) of soil and groundwater, indoor and outdoor inhalation of vapors, and dermal contact with soil.

The ingestion and dermal pathways are complete, but the exposure risk is considered acceptable based on the current and proposed future use of the property. The site is in a

commercial area with asphalt pavement, and remaining subsurface contamination is not available to receptors. Although soil at the site was above maximum allowable concentrations at the time of the former tank removal, it is expected that soil concentrations no longer exceed health based risk levels for the following reasons: the contaminated source area was treated by a VES; concentrations of benzene and GRO in groundwater were reduced to below Table C levels; and MTBE showed decreasing trends,

The inhalation exposure risk is considered acceptable because the onsite building is upgradient from soil that is currently potentially contaminated, and the groundwater results have been non-detect for GRO and BTEX since 2003.

Although groundwater at the site is not used as a drinking water source, the migration to groundwater pathway is considered complete. However, ADEC has determined that this does not present an unacceptable risk. The closest downgradient building is approximately 300 feet and is connected to the municipal water. The groundwater at the site has been non-detect for GRO and BTEX since 2003. There are no surface water bodies in the area.

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 Minimis Exposure, Exposure Controlled, or Pathway Incomplete.

ADEC Decision

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Corrective Action Complete- ICs determination subject to the following.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Holiday Alaska, Inc. shall report to ADEC every five years to document land use, or report as soon as Holiday Alaska, Inc. becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov.**
2. A Notice of Environmental Contamination must be recorded and will be attached to the ADEC database to document that there is residual contamination remaining onsite above most stringent ADEC cleanup levels.
3. Future installation of groundwater wells will require approval from ADEC.
4. Monitoring wells (MWs) must be decommissioned in accordance with the ADEC approved Work Plan for Monitoring Well Decommissioning at Holiday and/or Williams Stores dated May 29, 2009.
5. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)]

means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure and Notice of Environmental Contamination)

6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Corrective Action Complete determination, then the Institutional Controls will be terminated.

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.

Please sign and return *Attachment A* to ADEC within 30 days of receipt of this letter. If you have questions about this closure decision, please contact the ADEC project manager, Keather McLoone at (907) 269-7526.

Approved By,



Linda Nuechterlein
Environmental Program Manager

Recommended By,



Keather McLoone
Environmental Specialist

Attachment A: Corrective Action Complete-ICs Agreement Signature Page

Attachment B: Notice of Environmental Contamination and Site Figures.

Cc: Jessica Busey, Shannon & Wilson

Attachment A: Corrective Action Complete-ICs Agreement and Signature
Page*

Holiday Alaska, Inc. agrees to the terms of this Corrective Action Complete with ICs determination as stated in this Record of Decision (ROD) document dated **August 19, 2009** for the Holiday Station Store 616/Williams Express Store #5016 site, Hazard ID: 24581. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 18 AAC 78.276(f).

Signature of Authorized Representative, Title
Holiday Alaska, Inc.

Printed Name of Authorized Representative, Title
Holiday Alaska, Inc.

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the ADEC project manager, Keather McLoone at the address on this correspondence within 30 days of receipt of this letter.

***Attention ADEC Administration Staff:** Please do not file this form until the ADEC project manager has updated the database.

Attachment B: Notice of Environmental Contamination and Site Figures

Find Attachment B on the following pages

Notice of Environmental Contamination

Pursuant to 18 AAC 78.280(d), Holiday Alaska, Inc. and Williams Express Inc., as responsible parties of the subject property, hereby provides public notice that the property located at 12021 Old Glenn Highway, Eagle River, Alaska, has been subject to the release(s) of hazardous substances. The parcel's legal description is the Northwest ¼ of the Southwest ¼, Section 1, Township 14 North, Range 2 West, Anchorage (B-7) Southwest Quadrangle, Seward Meridian, Alaska.

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 through December 2006; and 18 AAC 78, Article 6, as amended January 30, 2003. 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 #1907
ADEC File No. 2107.26.001
ADEC Hazard ID: 24581

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 accordance with 18 AAC 78.276(f)(1), the ADEC reviewed and approved the cleanup actions as being protective of human health, safety, welfare, and the environment, subject to institutional controls and additional conditions (ICs) listed as follows:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore the Holiday Alaska, Inc. shall report to ADEC every five years to document land use, or report as soon as Holiday Alaska, Inc. becomes aware of any change in land ownership and/or use, if earlier.
2. A Notice of Environmental Contamination must be recorded and will be attached to the ADEC database to document that there is residual contamination remaining onsite above most stringent ADEC cleanup levels.
3. Future installation of groundwater wells will require approval from ADEC.
4. Monitoring wells (MWs) must be decommissioned in accordance with the ADEC approved Work Plan for Monitoring Well Decommissioning at Holiday and/or Williams Stores.
5. Any proposal to transport soil or groundwater off site requires ADEC approval in

accordance with 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure and Notice of Environmental Contamination)

- 6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

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 boundaries of the Holiday Station Store #616 facility, the approximate location and extent of remaining soil and/or groundwater contamination, 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 at the site has been shown to meet the most stringent soil cleanup levels in Method Two of 18 AAC 75.341 and/or groundwater meets the cleanup levels in Table C 18 AAC 75.345.

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

Holiday Alaska, Inc.:

Signature: _____
Printed Name: _____
Mailing Address: _____

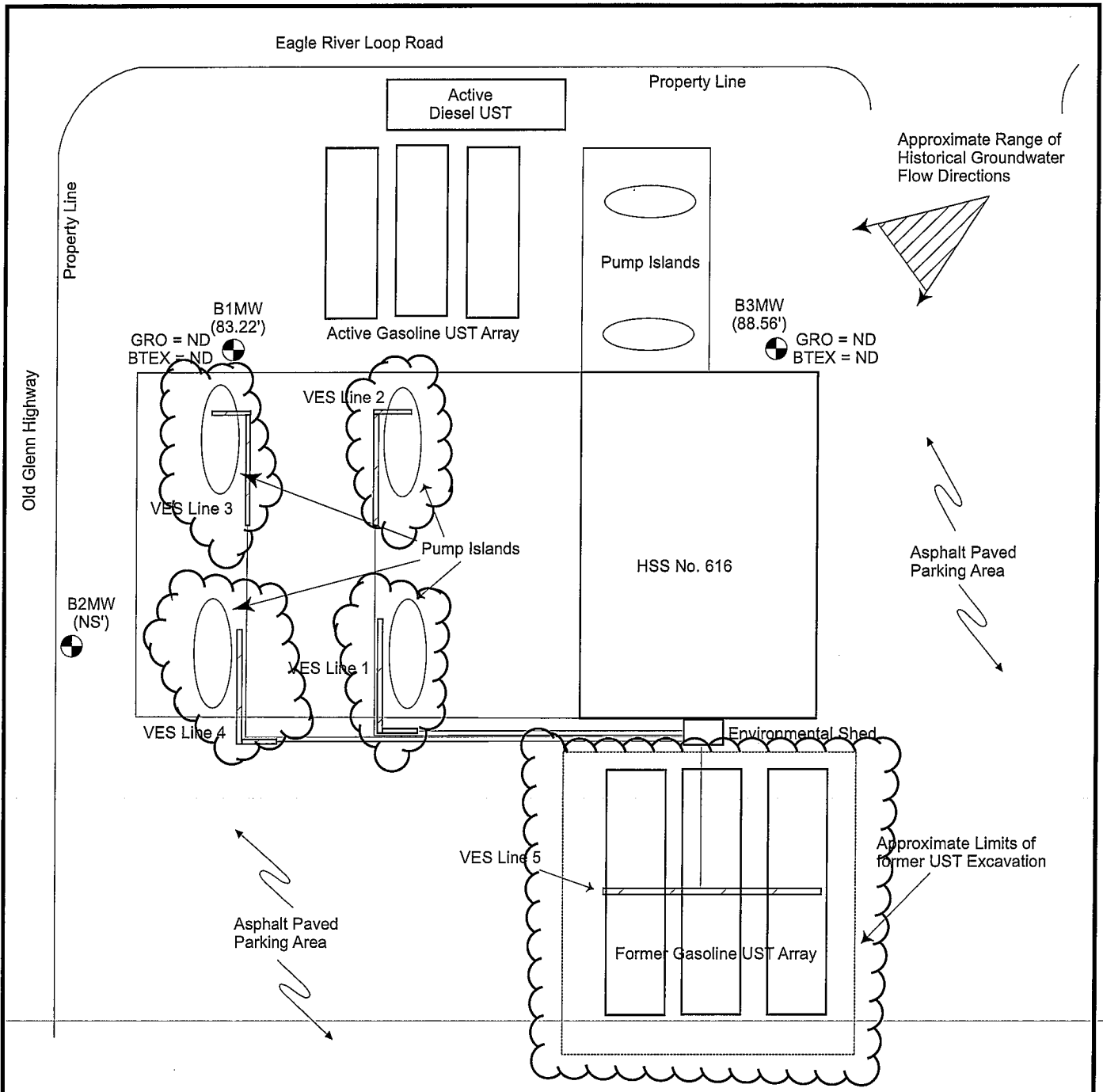
(Notarization seal)

Subscribed and sworn to before me this ____ day of _____, 2009.





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.



LEGEND

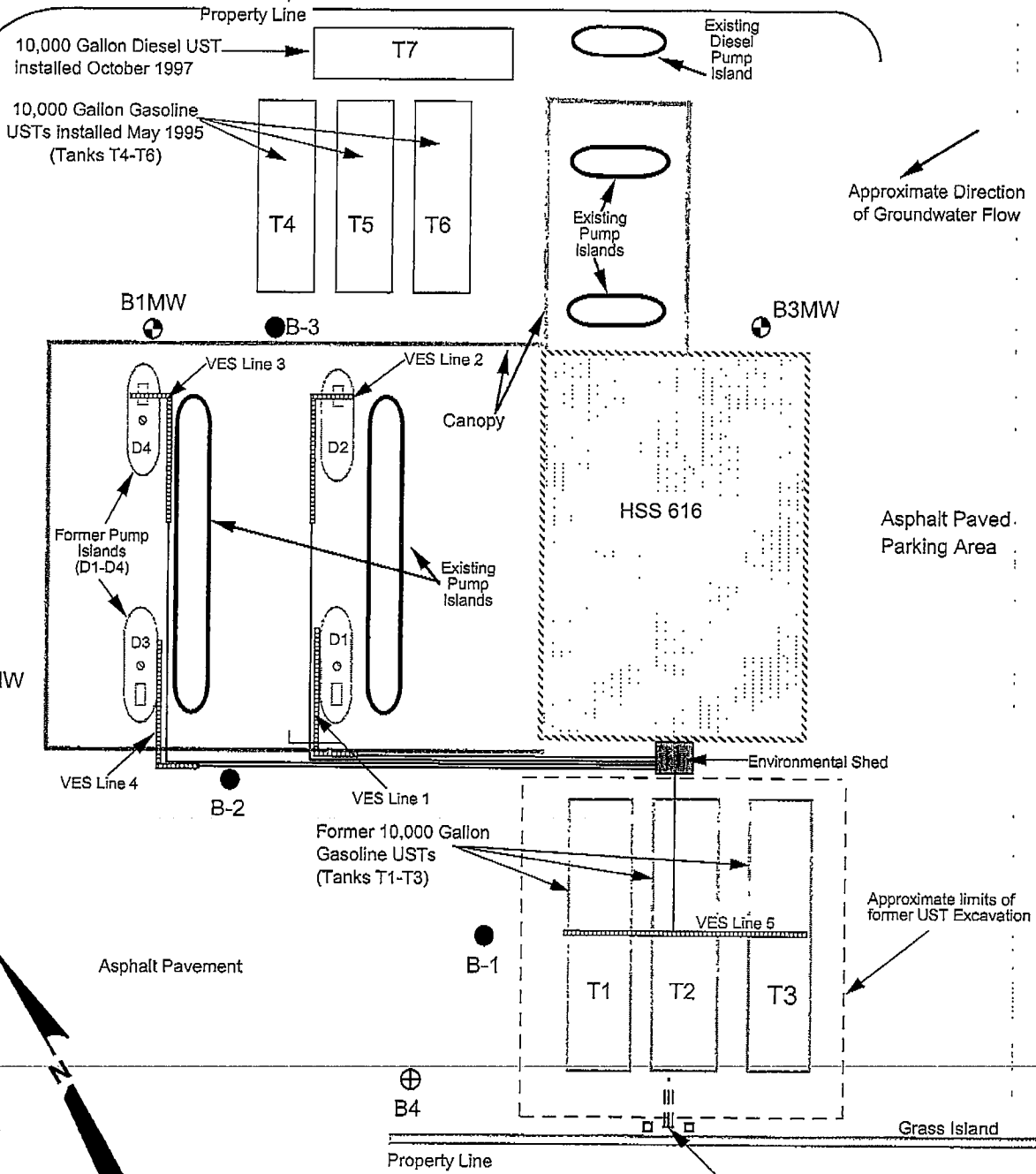
-  Approximate location and number of Boring/Monitoring Well B1MW installed by Shannon & Wilson.
- B1MW (83.22')** Groundwater elevation in feet, measured on April 23, 2008.
- GRO = ND** GRO and BTEX concentrations in mg/L, April 2008 monitoring event.
- BTEX = ND**
- NS** Not Sampled
-  Approximate location of 4" slotted HDPE pipe
-  Approximate location of 4" solid HDPE pipe
-  approximate location and extent of historic subsurface soil contamination








12021 Old Glenn Highway Eagle River, Alaska	
SITE PLAN	
June 2009	32-1-17309-166
 SHANNON & WILSON, INC. Geotechnical & Environmental Consultants	
Fig. 1	

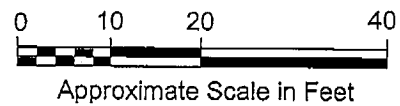
Eagle River Loop Road


Old Glenn Highway



LEGEND

-  Approximate location and number of Boring/Monitoring Well B3MW, installed by Shannon & Wilson
-  Approximate location and number of Boring B4, advanced by Shannon & Wilson in May 2000
-  Approximate location of Boring B-1, advanced by Shannon & Wilson in July 1991
-  Location of 4" slotted HDPE pipe (Placed in former fuel line & UST excavations)
-  Location of 4" solid HDPE pipe (Placed in former fuel line & UST excavations)



12021 Old Glenn Highway	
Eagle River, Alaska	
SITE PLAN	
June 2009	.32-1-17309-166
 SHANNON & WILSON, INC. Geotechnical & Environmental Consultants	Fig. 2