

# STATE OF ALASKA

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

**SEAN PARNELL, GOVERNOR**

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Anchorage, AK 99501  
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File: 2100.26.029

Return Receipt Requested

Article No: 7010 2780 0000 2178 4612

May 13, 2011

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

Re: Holiday Station Store #620/Williams Express Store #5020 - 2001  
Release Corrective Action Complete Determination-Institutional Controls

Dear Mr. Anthony:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the project file and environmental records associated with the Holiday Station Store #620/Williams Express Store #5020 - 2001 Release located at 2900 East Tudor Road in Anchorage. 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 letter, which is based on the administrative record for the Holiday Station Store #620, 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 Institutional Controls (ICs) determination.

## **Introduction**

### Site Name and Location:

Holiday Station Store #620/Williams Express Store #5020 - 2001 Release  
2900 East Tudor Road  
Anchorage, Alaska 99508

Name and Mailing Address of Contact Party:

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

**ADEC Site Identifiers**

File: 2100.26.029  
Hazard ID: 23024

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

**Background**

This location is also listed in the database as Former Williams Express Store 5020 - Jake Hess. A No Further Action Required letter was written on June 4, 1997 for this facility for contamination identified in the 1990s. The original filling station features were in the same general vicinity as the current filling station. The site was relisted in the database due to a suspected release associated with the tank access manways system in the early 2000s.

Soil samples collected at this site have been tested for benzene, toluene, ethylene, and xylenes (BTEX), total petroleum hydrocarbons (TPH), diesel range organics (DRO), and gasoline range organics (GRO). Groundwater samples collected at the site have been tested for BTEX, DRO, TPH, GRO, and polynuclear aromatic hydrocarbons (PAHs).

**Site Characterization and Cleanup Actions**

Following limited removal efforts in 1990 and 1996, concentrations remained in the soil up to 6,320 mg/kg TPH and 1,940 mg/kg DRO, respectively. Sampling of the groundwater showed TPH up to 88.1 mg/L in October 1995.

In 2001, a limited removal action was performed at this and several Holiday/Williams locations, due to discovery of a systematic problem with tank access manways. Following a limited excavation effort in 2001, concentrations remained in the soil with up to 0.655 mg/kg benzene.

No activity occurred at the site until 2009, when plans were made to further investigate and monitor. Borings advanced in 2009, contained up to 0.0144 mg/kg benzene. Three monitoring wells were installed in or downgradient from known site source areas. Three rounds of recently collected groundwater data show that soil contamination remaining does not appear to be impacting groundwater as all three monitoring wells have been nondetect.

### Contaminants of Concern (COCs)

- Benzene
- Diesel range organics

### 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 (MTG).

<u>Contaminant</u>	<u>MTG Site Cleanup Level (mg/kg)</u>
• Benzene	0.025
• Diesel Range Organics	250

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

<u>Contaminant</u>	<u>MTG Site Cleanup Level (mg/L)</u>
• Benzene	0.005
• Diesel Range Organics	1.5

### Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De Minimis Exposure, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

**Table 1 – Exposure Pathway Evaluation**

<b>Pathway</b>	<b>Result</b>	<b>Explanation</b>
Surface Soil Contact	De-minimis exposure	Remaining contaminant concentrations for COCs are below ADEC's direct contact cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Remaining contaminant concentrations for COCs are below ADEC's direct contact cleanup levels.
Inhalation – Outdoor Air	De-minimis exposure	Remaining soil contamination is well below the inhalation levels for benzene, and no other volatile compounds exceed cleanup criteria. Therefore, the contamination remaining is considered de minimis in nature/extent, and risk posed is considered to be insignificant.

Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	Remaining soil contaminant concentrations are well below the inhalation levels for benzene, and no other volatile compounds are present at levels exceeding applicable cleanup criteria. Remaining soil contamination is at depth and covered with clean fill; and existing structures are more than 30 feet upgradient. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	De-minimis exposure	Recent groundwater data at site nondetect; therefore, risk is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	Surface water is located in Campbell Creek about 500 feet to the south. Campbell Creek is not a source for drinking water, and onsite contamination does not appear to be migrating via groundwater; therefore, this pathway is incomplete.
Wild Foods Ingestion	Pathway Incomplete	Subject site is a paved commercial facility, and contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	There is no evidence of ecological impacts resulting from contamination associated with this site. Exposure routes are not present.

Notes to Table 1: “De-minimis exposure” means that in ADEC’s judgment, receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in ADEC’s judgment, contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

### **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 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](mailto:DEC.ICUnit@alaska.gov).**

2. A Notice of Environmental Contamination (deed notice) 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.
3. Decommissioning of onsite groundwater wells and remediation systems must be conducted in accordance with an ADEC approved workplan.
4. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
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. Soil contamination may be remaining in the area of the active and former tank arrays. When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan, and/or to the satisfaction of ADEC.
7. 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**

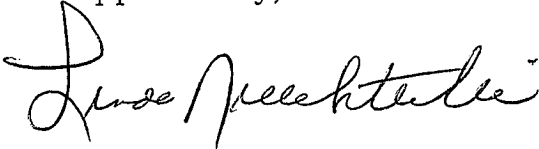
Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal

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,

Recommended By,



Linda Nuechterlein



Keather McLoone

Attachment A: Corrective Action Complete-ICs Agreement Signature Page  
Attachment B: Notice of Environmental Contamination

Cc: Dan McMahon, Shannon & Wilson

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

Holiday Alaska, Inc. agrees to the terms of this Corrective Action Complete with ICs determination as stated in this Closure Decision Document dated **May 13, 2011** for the Holiday Station Store #620/Williams Express Store #5020 - 2001 Release; Hazard ID: 23024. 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.**

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ADEC File No.                    2100.26.029  
Hazard ID:                        23024  
ADEC Project Manager:        Keather McLoone

**For Internal Use Only**

**\*Attention ADEC Administration Staff:** Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

## Notice of Environmental Contamination

**Recording District:** Anchorage

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 2900 East Tudor Road, Anchorage, Alaska, has been subject to the release(s) of hazardous substances.

This site has been subject to a discharge or release and subsequent cleanup and/or monitoring of oil and other hazardous substances, regulated under 18 AAC 78, as amended October 2006. This release and cleanup and/or monitoring is documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at [http://www.dec.state.ak.us/spar/csp/db\\_search.htm](http://www.dec.state.ak.us/spar/csp/db_search.htm) under Hazard ID number 23024; Site Name - *Holiday Station Store #620/Williams Express Store #5020 - 2001 Release.*

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup and/or monitoring as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment. ADEC determined, in accordance with 18 AAC 78.090 - 276 corrective action rules, that site cleanup has been performed to the maximum extent practicable even though residual fuel-contaminated soil and groundwater exists on-site. Further cleanup was determined to be impracticable because the tanks remain active and in place.

Attached is a site survey or diagram that shows the property boundaries, locations of existing structures, and the approximate location and extent of remaining soil and groundwater contamination.

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 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](mailto:DEC.ICUnit@alaska.gov).**



2. A Notice of Environmental Contamination (deed notice) 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.
3. Decommissioning of onsite groundwater wells and remediation systems must be conducted in accordance with an ADEC approved workplan.
4. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
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. Soil contamination may be remaining in the area of the active and former tank arrays. When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.
7. 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 the remaining contaminated soil becomes accessible during activities such as tank removal, or other 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 are required under 18 AAC 78.220 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 78, Article 2.

In the future, if soil is removed from the site or groundwater is brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time. Pursuant to 18 AAC 78.274 (b), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to 18 AAC 78, Article 2.

This notice remains in effect until a written determination from ADEC is recorded that states that soil and groundwater at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and groundwater meets the cleanup levels in Table C in 18 AAC 75.345 and that off-site transportation of soil and groundwater is not a concern.

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

**Holiday Alaska, Inc.:**

Signature: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_  
\_\_\_\_\_

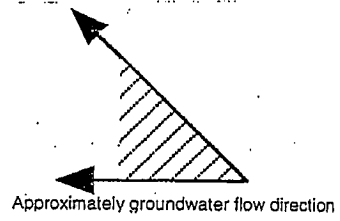
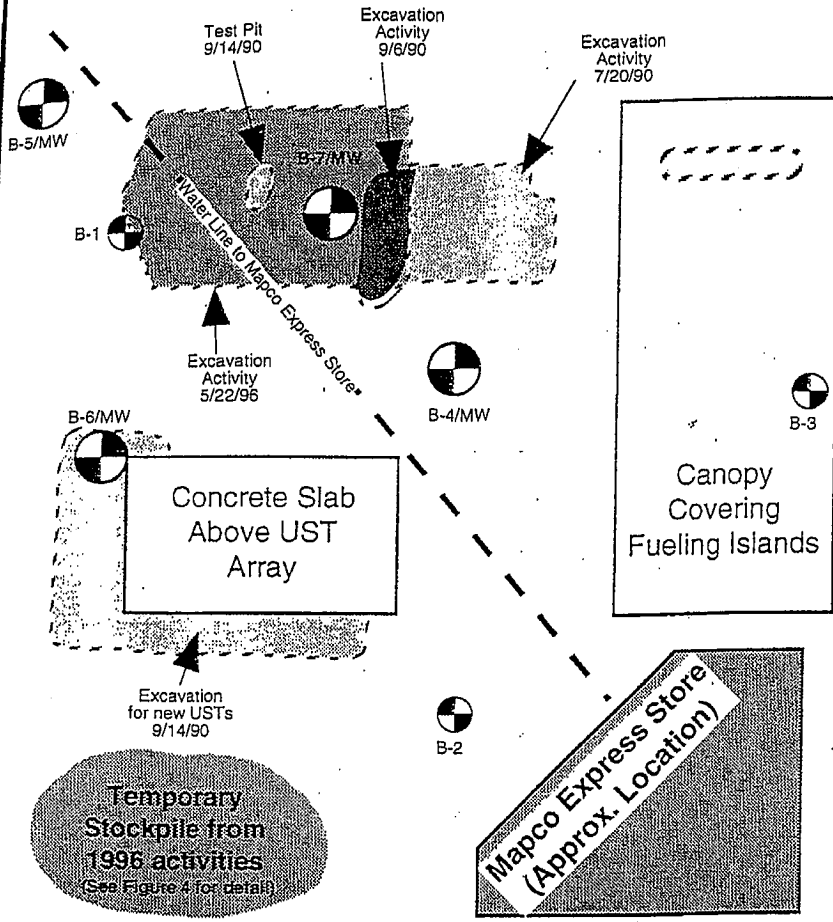
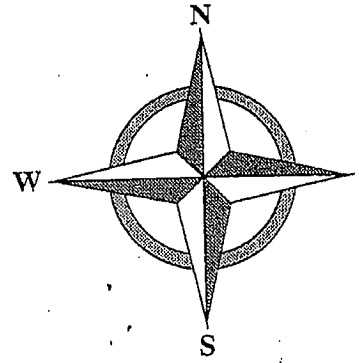
(Notarization seal)

Subscribed and sworn to before me this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

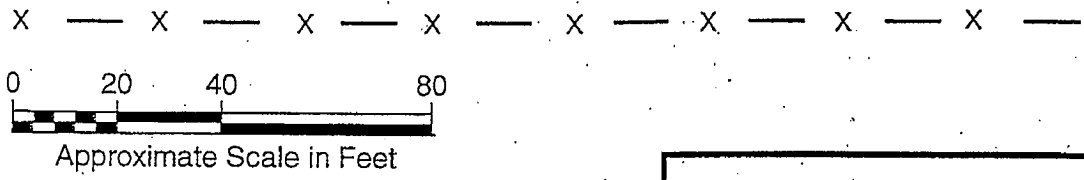
Notary Public in and for the State of \_\_\_\_\_  
My commission expires: \_\_\_\_\_


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, please double-check recording requirements.


Tudor Road



Wright Street



 Exploratory Boring B-4 with monitoring well by Shannon & Wilson

 Exploratory Boring B-1; placed by Shannon & Wilson

2900 East Tudor Road  
Anchorage, Alaska

**SITE PLAN**

June 1996

Y-321-6

East Tudor Road

B2MW

B5MW

B7MW

B4MW

Approximate location of  
2001 Limited Removal Action

Approximate location of  
Underground Storage Tanks

B6MW

B1MW

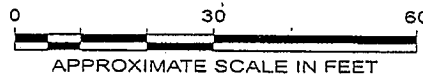
Fueling Canopy  
and Dispensers

Holiday Station Store No. 620



↑  
Apparent Groundwater  
Flow Direction

B3MW

Wright Street



**LEGEND**

-  B1MW Approximate location of Monitoring Well B1MW, installed by Shannon & Wilson May 2009.
-  B4MW Approximate location of former Monitoring Well B4MW.

2900 East Tudor Road  
Anchorage, Alaska

**SITE PLAN**

February 2011

32-1-17311-206