

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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File No: 2100.26.316
Certified Return Receipt
Article No: 7010 2780 0000 2178 4605

May 12, 2011

Bob Cloud
Wells Fargo Bank
MAC K3200-018
6831 Arctic Blvd.
Anchorage, AK 99518

Re: Decision Document; Former National Bank of Alaska-Benson
Corrective Action Complete -Institutional Controls Determination

Dear Mr. Cloud:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with National Bank of Alaska-Benson, located at 1500 West Benson Blvd. in Anchorage, Alaska. 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 (ICs).

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

National Bank of Alaska-Benson
1500 West Benson Blvd
Anchorage, Alaska

Name and Mailing Address of Contact Party:

Mr. Bob Cloud
Wells Fargo Bank
MAC K3200-018
6831 Arctic Blvd.
Anchorage, AK 99518

ADEC Site Identifiers:

Hazard ID #23108
CS file # 2100.26.316

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

Background

Hydrocarbon contamination was noted in 1995 during the removal of a 700-gallon diesel underground storage tank (UST) used to fuel the emergency generator at this commercial building.

Contaminants of Concern

During the various investigations at this site, soil and, groundwater samples were analyzed for diesel range organics (DRO). Based on the results of these investigations, the following contaminant of concern was identified:

- DRO

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>
• DRO	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>Site Cleanup Level (mg/l)</u>
• DRO	1.5

Site Characterization and Cleanup

During removal of the UST, approximately 38 tons of hydrocarbon impacted soil were excavated and disposed of at Anchorage Regional Landfill. The removal of impacted soil was limited by the presence of the building. Confirmation soil samples collected from the bottom and sides of the

excavation contained DRO up to 2,150 mg/kg along the northern wall of the excavation near the building.

A groundwater investigation was conducted at the site following removal of the UST. Two monitoring wells were installed downgradient of the source area, as determined by existing monitoring wells. Contaminants were not detected in groundwater at concentrations above ADEC Cleanup Levels.

Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants were 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

Pathway	Result	Explanation
Direct Contact with Surface Soil	Pathway Incomplete	Contaminated soil is not located at the surface.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	The remaining contaminated soil is below direct contact levels; beneath a building, and not available to receptors. Therefore it is considered de minimis in nature, and does not pose a significant risk.
Inhalation-Outdoor Air	De Minimis Exposure	Remaining contamination is below inhalation cleanup levels and de minimis in volume. Therefore risk via this pathway is considered insignificant.
Inhalation-Indoor Air	De Minimis Exposure	The remaining contamination is below inhalation cleanup levels; and considered de minimis due to the age of the spill and lack of volatile constituents. The placement of clean fill in the excavation further mitigates risk via this pathway.

Groundwater Ingestion	De Minimis Exposure	Groundwater contamination was limited to the immediate source area and was not present in downgradient monitoring wells
Surface Water Ingestion	Pathway Incomplete	Surface water in the area is not used for drinking water purposes.
Wild Foods Ingestion	Pathway Incomplete	Wild foods are not collected in this area.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at the site

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 Wells Fargo Bank shall report to ADEC once every five years, or as soon as Wells Fargo Bank becomes aware of any change in land ownership or use, if earlier. **The report can be sent to the ADEC project manager or electronically to DEC.ICUnit@alaska.gov.**
2. Once the contaminated soil remaining beneath the building becomes assessable, it must be evaluated in accordance with an ADEC approved work and/or to the satisfaction of ADEC.
3. Any remaining monitoring wells must be decommissioned in accordance with ADEC guidance.
4. 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.

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

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.

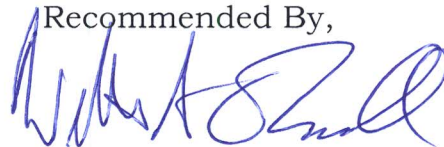
If you have questions about this closure decision, please contact ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,



Linda Nuechterlein
Environmental Manager

Recommended By,



William O'Connell
Environmental Program
Specialist

Attachment A: Corrective Action Complete- ICs Agreement Signature Page
Attachment B: Site Figure

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

Wells Fargo Bank agrees to the terms of this Corrective Action Complete with Institutional Controls determination as stated in this Decision Document dated **May 12, 2011** for National Bank of Alaska- Benson. 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 78.276(f).

Signature of Authorized Representative, Title

Printed Name of Authorized Representative, Title

For Internal Use Only

Project Manager: Bill O'Connell
Hazard ID #: 23108
CS file #: 2100.26.316

***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.

Attachment B: Site Figure

