STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: # 2100.26.149

Certified Return Receipt
Article No: 7010 2780 0000 2178 4155

October 4, 2011

Mr. William Burke
Pepsi Bottling Group
521 East 104th Ave.
Anchorage, AK 99515

Re: Decision Document; Pepsi Cola Warehouse
Corrective Action Complete Determination

Dear Mr. Burke:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Pepsi Cola Warehouse located at 521 East 104th Avenue 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 this site will be closed

This decision is based on the administrative record for the Pepsi Cola Warehouse, which is located in the offices of the Alaska Department of Environmental Conservation 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
Pepsi Cola Warehouse
521 East 104th Ave.
Anchorage, AK 99515

Name and Mailing Address of Contact Party:
Mr. William Burke
Pepsi Bottling Group
521 East 104th Ave.
Anchorage, AK 99515

ADEC Site Identifiers:
Hazard ID #23971
CS file # 2100.26.149

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

Background
This site is located in a light industrial area in south Anchorage and consists of an office building, a warehouse, a maintenance shop and a fueling area. This and all surrounding properties are served by Anchorage Water and Wastewater Utility which provides drinking water to the area.

Contamination at the site resulted from leaks and spills from three former 2,000 gallon underground fuel storage tanks (USTs) that were used to store diesel and gasoline. The USTs were removed in 1992 along with approximately 55 cubic yards of petroleum contaminated soil. An additional 250 cubic yards of petroleum contaminated soil were excavated in 1994. Site characterization activities were conducted on several occasions during the 1990's and included soil and groundwater sampling. A new UST system was installed approximately 50 feet east of the former USTs, and an active fueling area remains at the site.

After a decreasing trend in benzene concentrations in groundwater was documented, the site was granted a No Further Remedial Action Planned (AKA Corrective Action Complete with Institutional Controls) decision by ADEC in 2005. The closure conditions stipulated that groundwater monitoring continue until benzene concentrations were below Table C cleanup levels, and that additional soil samples be collected to document the remaining contaminant concentrations in soil.

By 2006, contaminant concentrations in groundwater had decreased below Table C cleanup levels. In an effort to have ICs removed, and obtain a Corrective Action Complete decision from ADEC, soil borings were advanced and sampled in 2007 and 2008 at the impacted area to evaluate contaminant concentrations in soil. During these investigations, GRO was detected up to 786 mg/kg and benzene was detected up to 7.28 mg/kg in a sample collected from 10 feet below ground surface (bgs). After soil sampling indicated GRO and benzene remained at concentrations above ADEC cleanup levels, a

second phase of investigation/remediation was initiated at the site. An air sparge/soil vapor extraction system was installed, and the site was re-opened in 2007.

Contaminants of Concern
During the various investigations at this site, soil and groundwater samples were analyzed for diesel range organics (DRO), residual range organics (RRO), gasoline range organics (GRO) volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene and xylenes (BTEX) and lead, Based on the results of these investigations, the following contaminants of concern were identified:

- GRO
- benzene

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.

Contaminant	Site Cleanup Level (mg/kg)
• GRO	300
• benzene	0.025

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

Contaminant	Site Cleanup Level (mg/l)
• GRO	2.2
• benzene	0.005

Site Characterization and Cleanup
After GRO and benzene were detected in soil at concentrations above ADEC cleanup levels in 2007 and 2008, one additional monitoring well, MW5, was installed in the area with the highest contaminant concentrations. A groundwater sample collected from this well in 2008 contained GRO at 5.77 mg/l and benzene at 0.103 mg/l.

In an effort to reduce contaminant concentrations in soil and groundwater, an air sparge/soil vapor extraction (AS/SVE) system was installed in the impacted area in 2008. The system was operated from December 2008 until March 2010 at which point it was shut down due to decreasing contaminant concentrations in vapor samples. The last vapor sample collected in October 2009 did not contain detectable concentrations of BTEX.

Groundwater monitoring was conducted at monitoring wells and/or air sparging wells from 2008 until 2011, including an AS/SVE system shutdown rebound test conducted in May 2010. During the seven groundwater monitoring events conducted during this time period, contaminants (GRO and benzene) were detected above cleanup levels in one well (MW5) on one occasion in 2008, as noted above. Otherwise, contaminants were either not detected, or detected below cleanup levels during all other monitoring events during this time period.

To evaluate the effectiveness of the AS/SVE system, soil boring were installed in 2010 at the same locations as 2007/2008, and soil samples were collected from approximately the same intervals where contamination had been found in 2007. In the eight soil samples collected, benzene was detected at concentrations significantly below those detected in 2007. At the location where benzene was detected at 7.28 mg/kg at 10 feet bgs in 2007, a 2010 sample from 12 feet bgs contained benzene at 0.045 mg/kg. Similarly, at the location where benzene was detected at 4.44 mg/kg at 14 feet bgs in 2007, the 2010 sample from the same interval contained benzene at 0.0073 mg/kg. The highest benzene concentration detected in 2010 was 0.224 mg/kg, detected at 20 feet bgs in borehole CB-1.

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 surface soil is not present at the site.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	The remaining contaminated soil is beneath the asphalt apron; covered by clean fill and is below direct contact levels for COCs.
Inhalation-Outdoor Air	De Minimis Exposure	Clean fill above contaminated soil will mitigate exposure via this pathway, and remaining contamination is below inhalation levels.

Inhalation-Indoor Air	Pathway incomplete	Occupied buildings are not located near the impacted area. Clean fill above contaminated soil will mitigate exposure via this pathway for future receptors.
Groundwater Ingestion	De Minimis Exposure	Groundwater is not used as a drinking water source in this area, and contaminant concentrations in groundwater are below cleanup levels
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 cleanup actions to date have served to excavate or adequately treat contaminated soil at the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. 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). 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 ADEC Project Manager William O'Connell at (907) 269-3057.

Approved By,

Linda Nuechterlein
Environmental Manager

Recommended By,

William O'Connell
Environmental Program Specialist