2004-028650-0
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ALASKA

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THIS COVER SHEET APPEARS AS THE FIRST PAGE OF THE DOCUMENT IN THE OFFICIAL RECORD.

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Return to:
Kevin Shields
3455 Rewak Dr, Ste 101
FBKS, AK 99709

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STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

TONY KNOWLES, GOVERNOR

610 University Avenue
Fairbanks, AK 99709-3643
PHONE: (907) 451-2166
FAX: (907) 451-2155
http://www.state.ak.us/dec/

Memorandum

File: 102.38.071

September 30, 2002

Kevin Shields
McKinley Motors
2201 South Cushman
Fairbanks, AK 99701

Re: No Further Remedial Action Planned
McKinley Motors
2201 South Cushman
Reckey number: 1995310121501

Dear Mr. Shields:

The Alaska Department of Environmental Conservation (ADEC) has completed review of the documents entitled Groundwater Sampling, September 16, 2002 and Additional Information for the Conceptual Site Model prepared by Travis/Peterson Environmental Consulting, Inc. (TPECI) dated September 24 and 25, 2002. Based on the review and the information presented below, ADEC has determined that no further remedial action is planned (NFRAP) for this site to address residual soil and groundwater contamination. The remaining minimal soil impacts will be addressed over time through institutional controls and site management. It is evident that offsite impacts exist that are likely a result of a release or releases at this property. As such, the issuance of a NFRAP for this property will be contingent upon the management of a long-term groundwater monitoring program.

Background:
The McKinley Motors' property is currently a used car dealership, but prior to that this site was the former Pioneer Trailer Court.

In July 1995, a Phase I and a limited Phase II were conducted by Shannon & Wilson, Inc., as part of a property sale from Mr. Elbert to Mr. Mike Shields. Mr. Elbert conducted an additional investigation on the property and identified the following three areas of hydrocarbon contamination (see Attachment A):

1. The location of an underground heating oil tank servicing the former Pioneer Trailer Court office and laundry facility;
2. Near the south property boundary to the north of the Ranch Motel (small excavation);
3. Center of the trailer court (large excavation).

Soil:

Demolition of buildings and excavation of some identified impacted soil was conducted onsite by the current owner, and the soil was removed and thermally remediated. The impacts extended beyond the excavation limits in both the small and large excavations described above. In total, more than 300-cubic yards were removed and transported offsite for thermal treatment. According to the reports, it was believed that the highest concentration areas in each of the excavation locations were removed. Excavation was stopped due to the realization of the significant amount of contaminated material that was determined to exist on the site.

The primary contaminant appears to be diesel from unknown sources. An estimated 2,250-cubic yards of hydrocarbon-impacted material remain in the area of the large excavation with diesel range organic (DRO) levels from 2,781 mg/kg to 48,677 mg/kg. An estimated additional 1,000-cubic yards remain adjacent to the small excavation with DRO levels in excess of 21,000 mg/kg (Borjesson, August 1995). It was estimated that the majority of the petroleum impacts were confined to the top 8 feet below ground surface.

Groundwater:
As part of the limited Phase II, two of the five soil borings were completed as monitoring wells (MW-1 and MW-2). MW-1 was installed in the small excavation area and MW-2 was installed downgradient from the Pioneer Trailer Court office that was known to have a fuel tank. Both wells were sampled and the groundwater was analyzed for purgeable halocarbons by EPA Method 601 and purgeable aromatics by EPA Method 602. Trichloroflouromethane was detected in both wells at 3.4 and 4.6 micrograms per liter (µg/l). ADEC does not have a cleanup level established for trichloroflouromethane, but the EPA Region 9 Risk Based Cleanup Level (RBCL) for trichloroflouromethane is 1,300 µg/l. Other volatile compounds were detected in those wells at levels below ADEC Table C cleanup levels. MW-1 was subsequently destroyed during excavation activities.

In August of 1996, AGRA Earth & Environmental (AEE) installed two additional wells (MW-3 and MW-4). MW-3 was installed in an inferred downgradient direction (northwest) from the large excavation and MW-4 was installed in the area of the small excavation to replace former MW-1 (Attachment A). All three monitoring wells were sampled after installation and analyzed for diesel range petroleum hydrocarbons (DRPH), gasoline range petroleum hydrocarbons (GRPH) and benzene, toluene, ethylbenzene, and xylene (BTEX). Sample results were non-detect for GRPH and BTEX in MW-2 and MW-4 with only trace amounts of DRPH (below ADEC cleanup levels). The sample collected from MW-3 had DRPH levels of 300 milligrams per liter (mg/l, see Table 1). Trace amounts of GRPH and BTEX were detected in MW-3 (below ADEC cleanup levels). Subsequent sampling of MW-2 and MW-4 has not indicated petroleum contaminant levels above ADEC cleanup levels.

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The following table shows the **contaminant levels and the free product layer over time for MW-3:**

Table 1:

Date	Free product thickness (feet)	DRPH (mg/l)	GRPH (mg/l)	Benzene (µg/l)	Toluene (µg/l)	Ethyl Benzene (µg/l)	Xylene (µg/l)
9/14/96	0.01	300	0.712	2.85	ND (0.5)	17.8	29.7
12/13/96	0.02	160	0.692	3.66	ND (0.5)	11.4	26.8
3/25/97	0.80	NS	NS	NS	NS	NS	NS
6/30/97	0.05	NS	NS	NS	NS	NS	NS
4/16/02	0.008	227	1.38	2.98	ND	10.1	34.2
8/10/02		11	NA	2.2	ND	8	23
9/19/02		31.2	0.372	1.87	ND (0.002)	6.9	6.3
ADEC - Table C		**1.5**	**1.3**	**5**	**1000**	**700**	**10,000**

NS - Not Sampled
NA - Not Analyzed
ND - Non-Detect

In August of 2002, TPECI installed direct push wells in order to delineate the extent of groundwater contamination both on and offsite (see Attachment B). DRO contamination was identified extending offsite downgradient from MW-3. The total impacted area is estimated by TPECI to be 0.16 acres. DP-4, thought to be adjacent to the large excavation area, had non-detect for DRO. Based on this information, TPECI theorizes that at least part of the groundwater contamination is coming from surface water runoff from the paved parking lot running down the bore of MW-3. However, this does not account for the elevated concentrations that were identified at the time of installation of MW-3, which was one year prior to paving of the lot.

Based on the information to date, the DRO contaminant levels from MW-3 groundwater plume appear to be at a steady state. The groundwater plume extending offsite from MW-3 has contaminant levels as high as 83.1 mg/l DRO from DP-6 (September 2002). The monitoring wells that define the extent of the offsite groundwater plume will continue to be sampled as part of a long-term monitoring plan in order to establish a trend in the contaminant levels. Once a trend is established, the monitoring frequency can be re-evaluated.

Potential Exposure Pathways:

Groundwater Pathway:

The 1995 soil samples collected from the three identified areas of impacted soil show that contamination exists above ADEC Method 2 Migration to Groundwater (under 40 inch zone) cleanup levels. In August 2002, a direct push well was installed near the large excavation to identify the contaminant source. Sample results from that well indicated non-detect for DRO and BTEX.

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The only identified groundwater plume associated with this site is the one that extends offsite on the north side of the property with DRO contaminant levels that exceed ADEC Table C values. A well search conducted in the area of the McKinley Motors site identified no downgradient drinking water wells in a quarter mile area. A door to door survey of the immediate downgradient property owners verified that those properties were being served by the City of Fairbanks public water system. Therefore, the groundwater pathway was determined to be incomplete.

Air Pathway:
The 1995 soil samples that were collected from the referenced small and large excavations had soil contamination that exceeded ADEC Method 2 Inhalation (under 40 inch zone) cleanup levels. In 1997, the McKinley Motors site was paved with asphalt. Therefore, the outdoor air pathway was determined to be incomplete.

The building that was constructed onsite in 1996 appears to have been built near the location of the large excavation. In the TPECI conceptual site model, they state that the building has a concrete foundation with no basement or crawl space. In addition, DP-4 installed adjacent to the building had non-detect for benzene and DRO. Given that the site is paved with asphalt; the building has no crawl space or basement, and the primary contaminant of concern is diesel, the indoor and outdoor air pathways were determined to be incomplete. The indoor-air pathway must be evaluated for any additional buildings constructed onsite in the future.

Conclusion:
Based on the above information, ADEC determines that no further remedial action is planned for the site. However, institutional controls (IC) will remain in effect until such time as the responsible party of McKinley Motors can demonstrate that cleanup levels in the contaminated soil are reduced to levels established in 18 AAC 75.341 and groundwater concentrations are reduced to cleanup levels established in 18 AAC 75.345. The following stipulations will apply to maintain the NFRAP for this site:

1. Any excavation of soil or extraction of groundwater at the McKinley Motors site must be assessed for contamination by a qualified third party. Prior to conducting any intrusive or excavation activities on this property, the ADEC must be notified and the conditions of this control reviewed by the appropriate staff within the Contaminated Sites Program. If contamination is encountered in the excavation, then appropriate removal and treatment of the excavated soil/groundwater will be required in accordance with current regulations. This IC will be noted in the ADEC Contaminated Sites Database.

2. A long-term monitoring program will be developed and agreed to between the responsible party of McKinley Motors and ADEC by no later than October 23, 2002. It will be maintained until such time that the groundwater is determined to meet cleanup requirements, as per current regulations for that time. Failure to maintain the monitoring requirements as agreed to between the ADEC and the responsible party of McKinley Motors may void the determinations made in this NFRAP, and the ADEC may choose to require additional assessment, monitoring, or remediation. The requirement for long-term monitoring will be noted in the ADEC Contaminated Sites Database.

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This decision is based on information presented to date but does not preclude ADEC from requiring additional assessment and/or cleanup action if information that is not currently available to the ADEC indicates the site might pose an unacceptable risk to human health or the environment. A significant change in monitoring conditions may warrant additional assessment requirements.

If you have any questions, please feel free to contact me at (907) 451-5174 or e-mail me at Deborah_Williams@envircon.state.ak.us.

Sincerely,

Deborah Williams

Deborah Williams
Environmental Specialist

Sincerely,

John Carnahan
Acting Section Manager
Fairbanks/Juneau Field Operations

Enclosure

cc (w/enc.): Larry Peterson, TPECI

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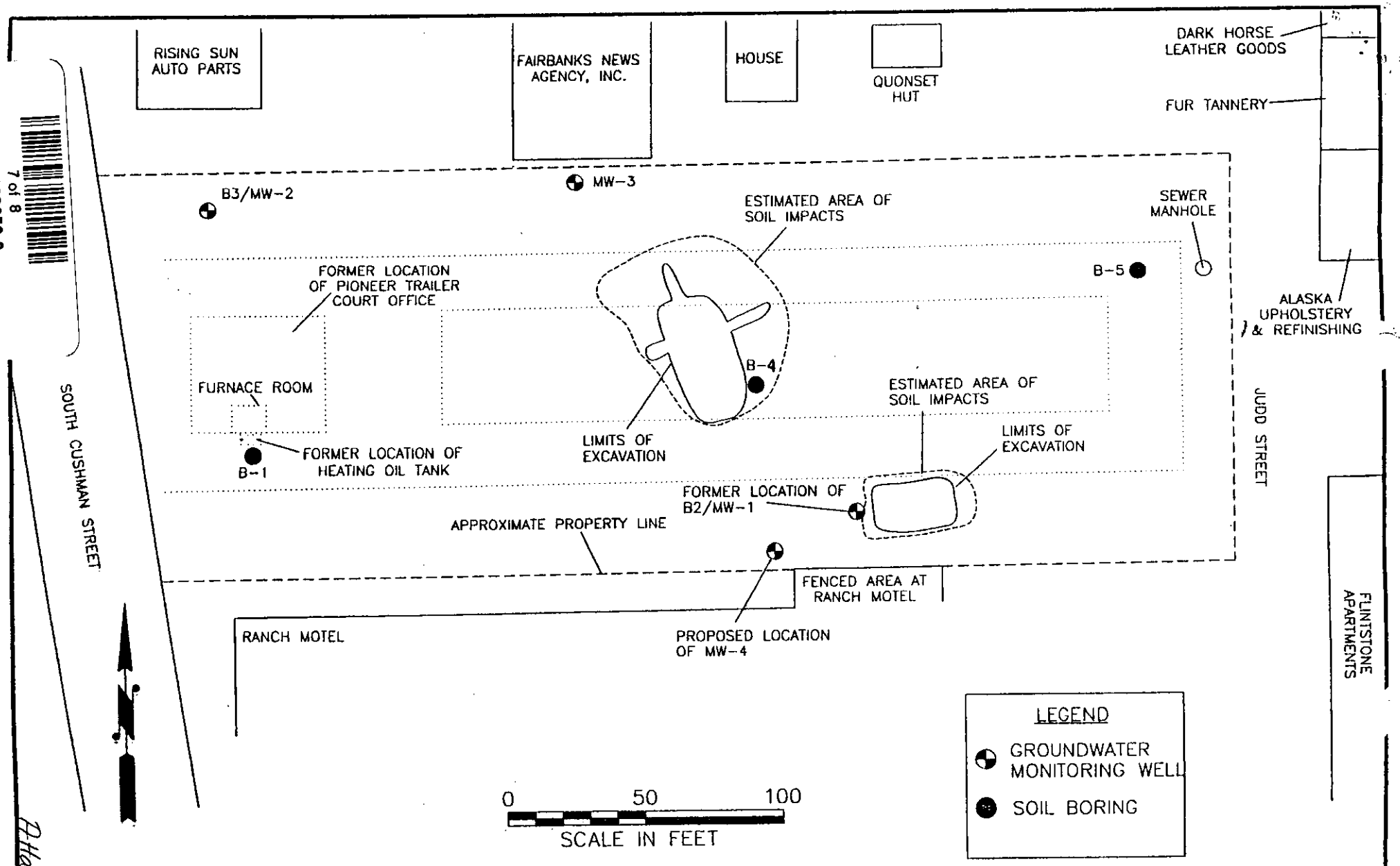

FIGURE DERIVED FROM S&W 1995 SITE ASSESSMENT

AGRA
Earth & Environmental
3504 Industrial Ave. Suite 5
Fairbanks, Alaska 99701

W.O.	6-024-01186-1
DESIGN	S&W
DRAWN	EBP/SIT
DATE	03/26/96
SCALE	1"=50'

FORMER PIONEER TRAILER COURT
2201 SOUTH CUSHMAN STREET
FAIRBANKS, ALASKA

SITE PLAN
FIGURE 1

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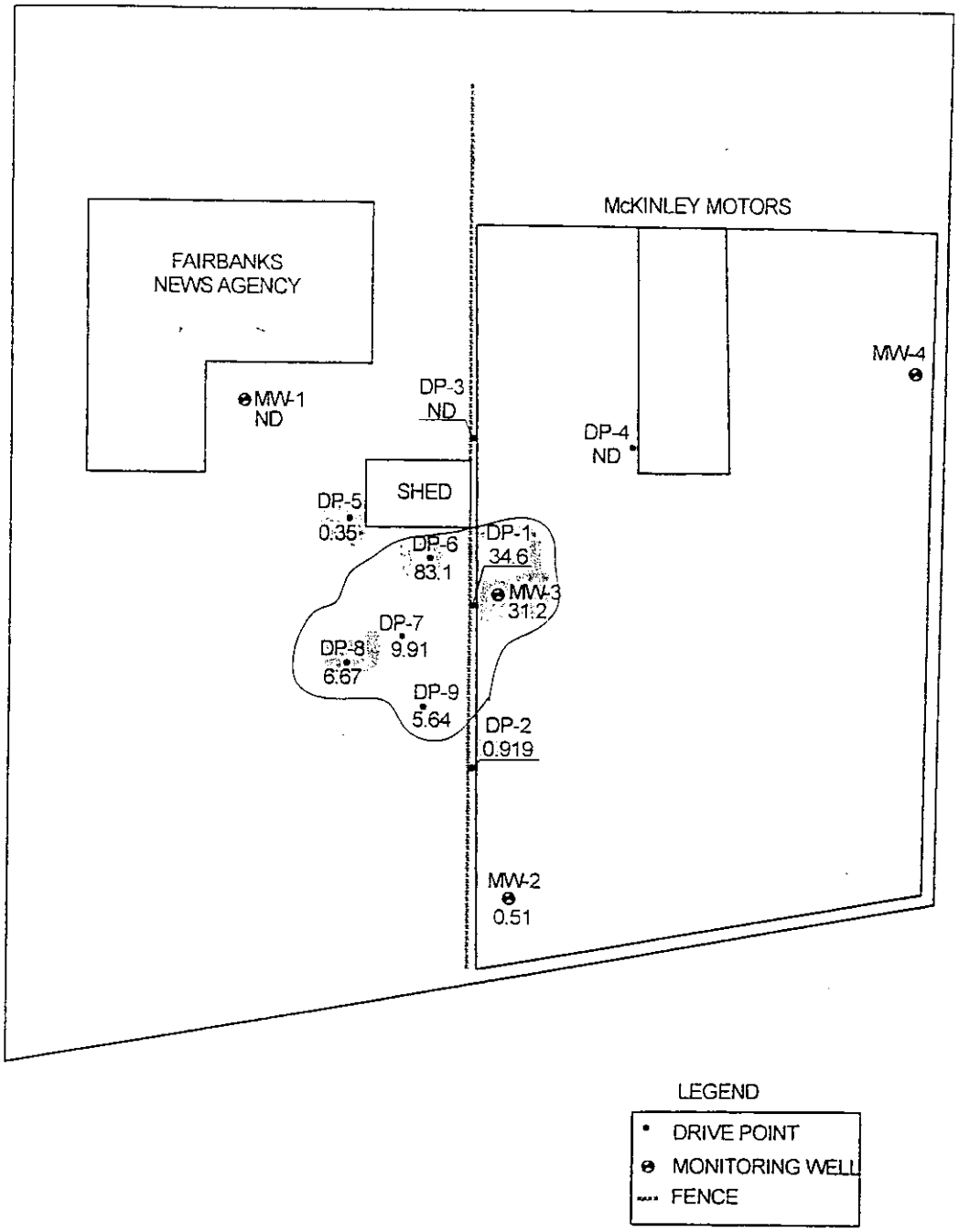
Attachment A

DIESEL RANGE ORGANICS
ADEC CLEANUP CRITERION 1.5 mg/L



LEGEND

- DRIVE POINT
- MONITORING WELL
- FENCE

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Attachment B

TRAVIS/PETERSON ENVIRONMENTAL CONSULTING, INC. 329 2ND STREET FAIRBANKS, ALASKA 99701	McKINLEY MOTORS	MCKINLEY MOTORS DIESEL RANGE ORGANICS FIGURE 3

PROJECT No: 1091-04	FILE: 1091/04/Figures/Site Plan Figures/Figure 3 Diesel Range Organics	DATE: 09/24/02	1"=75'