THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation
DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program
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File No: 2100.26.020

December 19, 2012

Ms. Rebecca Brown
One Williams Center
P.O. Box 3483, MD 48-6
Tulsa, Oklahoma 74172

Re: IC Modification for Williams Express Store #5004

Dear Ms. Brown;

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has received and reviewed the *May 2011 and April 2012 Groundwater Monitoring Report* for *Former Williams Express Site No. 5004*, which included a request to end annual groundwater monitoring at the subject property.

The requirement to conduct annual groundwater monitoring was established as one of five Institutional Controls (ICs) in ADEC's October 12, 2005 Corrective action Complete (CC) with ICs determination, which can be found online at the following website (http://dec.alaska.gov/Applications/SPAR/CCReports/closuredocs/853_Williams%205004.pdf). It was designed to monitor plume mobility and potential off-property migration. This monitoring effort has shown that natural attenuation, without enhancement, is proving to be an effective strategy to address the remaining contamination (see Table 1).

Table 1. Comparison Between Concentrations at Closure (in 2005) and Current (2012) Concentrations. Monitoring data show that natural attenuation is successfully reducing contamination. *All units are shown in mg/L, and concentrations exceeding ADEC Table C cleanup levels are shown in bold. J+ indicates the value is likely to be overestimated based on laboratory quality control indicators.

	Monitoring Well CGMW	Monitoring Well AIW4	Table C Cleanup Level
Benzene*			0.005
Concentration at Closure (Oct 11, 2005)	1.69	0.000564	
Most Recent Concentration (April 23, 2012)	0.0627	ND (<0.00015	

GRO*			2.2
Concentration at Closure (Oct 11, 2005)	4.44	ND	
Most Recent Concentration (April 23, 2012)	0.49J+	ND (<0.00015)	
DRO*			1.5
Concentration at Closure (Oct 11, 2005)	**5.15 mg/L**	**10.4 mg/L**	
Most Recent Concentration (April 23, 2012)	**2.78 mg/L**	ND (<0.188)	
RRO*			1.1
Concentration at Closure (Oct 11, 2005)	**3.22 mg/L**	1.01	
Most Recent Concentration (April 23, 2012)	**1.76 mg/L**	ND (<0.156)	

There has been no evidence of continued contaminant migration in the seven years following site closure, and contaminant concentrations continue to decrease with time. Therefore, it is no longer necessary to conduct annual groundwater monitoring at this site. The other ICs, to include: prohibitions on excavating and transporting soil; prohibitions on installing groundwater wells; and a recorded deed notice, will remain in effect.

This property is currently occupied by Continental Motors, a large auto sales company in Anchorage, Alaska. Continental Motors maintains a paved auto sales lot, which serves as a cap over the remaining contamination. Any future change in land use may impact the exposure assumptions cited in this document, thereby affecting the usefulness of current ICs. Therefore, an IC will be added for the responsible party to report to ADEC **every five years,** or earlier if Williams becomes aware of any change in land status, to document land use and the integrity of the asphalt cap. **This report can be sent electronically to DEC.ICUnit@alaska.gov.**

Sincerely,

Richard R. Bernhardt, Ph.D.
Environmental Program Specialist

Cc: Mark Gebbia, William
Matt Hemry and Dan McMahon, S&W