THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File: 102.26.172
Return Receipt Requested
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April 10, 2013

Estate of Roy G. Johnson
Alaska Petroleum
1095 Dennis Road
North Pole, AK 99705
Attn: Personal Representative – Pamela Johnson

Re: Decision Document; Gas Line 1, 3027 Airport Road - Corrective Action Complete with Institutional Controls (IC) Determination; Hazard ID No. 25988; Ledger Code 49642113

Dear Ms. Pamela Johnson;

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Gas Line 1, located at 3027 Airport Road in Fairbanks, 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. However, 13.98 tons of contaminated soil from this site is currently stored at OIT awaiting thermal treatment. Those soils are scheduled for treatment in the summer of 2013.

This decision is based on the Gas Line 1, 3027 Airport Road administrative record which is located in the offices of the ADEC 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 IC determination.

Introduction

Site Name and Location
Gas Line 1
3027 Airport Road
Fairbanks, Alaska
Legal Description: Lot 1A Value Village subdivision

Name and Mailing Address of Contact Party:
Estate of Roy G. Johnson
Alaska Petroleum
1095 Dennis Road
North Pole, AK 99705
Attn: Personal Representative – Pamela Johnson

ADEC Site Identifiers:
Hazard ID #25988
Facility ID# 62
CS file # 102.26.172

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

Background
The Gas Line 1 property is located off of Airport Way in Fairbanks. The two regulated underground storage tanks (USTs) were installed in 1997 and the facility was operated as gas station until 2012

The USTs were in use since 1997. The two 12,000 gallon gasoline USTs, and their associated piping and dispensers were removed on October 23, 2012. The site assessment work conducted in October 2012 was not considered complete, and on December 28, 2012 supplemental sampling was conducted at the site in accordance with an ADEC approved plan.

The property is connected to the City of Fairbanks publically owned sewer and water systems. Groundwater in the immediate area is at 15 feet below ground surface. The nearest identified drinking water well was at 1,350 feet from the site.

Site Characterization and Cleanup Activities
The two 12,000 gallon gasoline USTs, and their associated piping and dispensers were removed on October 23, 2012. The site assessment work conducted in October 2012 was not considered complete for the following reasons: the excavated soil did not have analytical samples collected from it to determine if it was contaminated; no field screening or analytical samples were collected for the product and vent piping; and no soil sample was collected at the soil/water interface as required when groundwater is suspected to be within five feet below the bottom of the tank. Groundwater was not encountered during this excavation work. The nearest identified drinking water well was at 1,350 feet from the site.

On December 28, 2012 supplemental sampling was conducted at the site in accordance with an approved plan. One of those soil samples collected at the piping had 0.676 mg/kg benzene and 400 mg/kg GRO collected at 3 feet below ground surface. All of the other samples were below migration to groundwater cleanup levels.

In accordance with an approved plan, on February 26, 2013 a 10x10 foot area 3 feet deep was excavated where a previous piping sample had identified soil contamination above cleanup levels. The excavated soil was transported to OIT for thermal treatment. Confirmation soil samples were collected from the sidewalls and base of this excavation that had up to 0.0955 mg/kg Xylenes,

<0.0138 mg/kg benzene, <0.259 mg/kg naphthalene, and <3.18 mg/kg GRO which are below the most stringent DEC cleanup levels.

Contaminants of Concern

During the investigation at this site, soil samples were analyzed for gasoline range organics (GRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on the results of these investigations, the following contaminants of concern were identified in soil:

- GRO
- Benzene
- Toluene
- Ethylbenzene
- Total xylenes

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
• Toluene	6.5
• Ethylbenzene	6.9
• Total xylenes	63

Pathway Evaluation

Following a review of the environmental records for 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

Pathway	Result	Explanation
Direct Contact with Surface Soil	De Minimis Exposure	Remaining petroleum contamination is below the direct contact cleanup level for soil.
Direct Contact with Sub-Surface Soil	De Minimis Exposure	Remaining petroleum contamination is below the direct contact cleanup level for soil.
Inhalation-Outdoor Air	De Minimis Exposure	Remaining petroleum contamination is below the inhalation cleanup level for soil.

Inhalation-Indoor Air	Pathway Incomplete	Remaining GRO and BTEX contamination is below those constituent's 18 AAC 75.341 most stringent migration to groundwater cleanup levels for soil. No buildings within 30 feet of remaining contamination.
Groundwater Ingestion	Pathway Incomplete	Confirmation soil samples at the bottom of the excavation at 3.0 ft. bgs did not contain contaminants above migration to groundwater cleanup levels. Groundwater was encountered at 15 ft. bgs at the site. The nearest identified drinking water well was at 1,350 feet from the site.
Surface Water Ingestion	Pathway Incomplete	The nearest surface water body, the Chena River, is located 1,200 feet from the site. 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 with IC's determination subject to the following:

1. That the 13.98 tons of contaminated soil from this site that is currently stored at OIT is thermally treated. Documentation that the soil has been successfully treated must be submitted by August 31, 2013.

This IC will be noted in the ADEC Contaminated Sites database. Once the thermal treatment of the 13.98 tons of contaminated soil at OIT is documented then the IC for this site can be removed.

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

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 Robert Weimer at (907) 269-7525.

Approved By,

Robert Weimer
Environmental Engineering Associate

Cc: Lyle Gresehover, Alaska Resources and Environmental Services LLC, consultant

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

Alaska Petroleum agrees to the terms of this Correction Action Complete – Institutional Controls determination as stated in this Closure Decision Document dated **April 10, 2013** for the *Gas Line 1, 3027 Airport Road* site. 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
Alaska Petroleum

_____

Printed Name of Authorized Representative, Title
Alaska Petroleum

Note to Alaska Petroleum Potential Responsible Person (PRP):
After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

ADEC File:# 102.26.172
Hazard ID: 25988
ADEC Project Manager: Robert Weimer

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.