STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 1516.26.160

May 22, 2003

Mr. William B. Tatsuda
Tatsuda's Supermarket Inc.
P.O. Box 8820
Ketchikan, AK 99901

Re: Stockpile Sampling Results-Gas-At-Last (Hogarty 2003)
No Further Action Decision
Tatsuda's Gas At Last 655 Stedman Street Ketchikan AK
Gas At Last - Ketchikan Facility ID: 424 LUST ID: 2711 Database ID: 1998130013901

Dear Bill:

The Department of Environmental Conservation (ADEC) Juneau Office has reviewed the Stockpile Sampling Results-Gas-At-Last report prepared by Technical Environmental Consulting Services-Alaska (TECS-AK) and dated May 9, 2003 requesting closure of the on-site soil stockpile. The referenced report acknowledges a Department request for information and additional work dated December 23, 2002. Based on our review of the project file and the information and analytical results provided by your consultant, ADEC finds that the referenced site pertaining to the former locations of the three underground storage tanks (USTs) and the associated on-site contaminated soil stockpile, do not pose a significant threat to human health or safety, or the environment.

Site History

The Gas At Last facility is located on Lot 1, USMS 550 at 655 Stedman Street in Ketchikan, Alaska. On January 27^{t}-30 in 1998 field activities and analytical results associated with the removal of three USTs on the property found elevated concentrations of petroleum in subsurface soil. A 3,000-gallon UST used to store diesel and two 5,000-gallon USTs used to store unleaded gasoline were removed along with associated pump islands, dispensers, and piping. All three USTs had undergone tightness testing that gave no indication of tank containment failure. The USTs were replaced with a 10,000-gallon double-walled fiberglass UST.

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Site Investigation
At the time of removal of the USTs field screening detected petroleum in subsurface soils. In accordance with 18 AAC 78.235 a Release Investigation Site Assessment was performed by consultant Shannon and Wilson. Field screening and soil removal from the excavation focused initially above the water table where 15 cubic yards of petroleum impacted soil was identified beneath the pump islands and around the fill pipes on the tanks. As instructed by Department staff, confirmation samples were collected from the excavation walls in soil just above the water table as field screening at greater depth was impaired by high soil moisture content. As the tank removal progressed beneath the water table all soil from the excavation were assumed to be contaminated and were added to the initial 15 cubic yard stockpile. The condition of the groundwater was inspected on-site by Department staff at the time of the tank removal and dewatering the excavation to municipal storm drain was approved. It is the opinion of the Department that possible impacts to groundwater from the low petroleum concentrations characterized at the site have naturally attenuated to regulatory levels.

Five excavation closure soil samples and seven stockpile soil samples and a field duplicate were collected in accordance with the Storage Tank Procedures Manual and requirements under 18 AAC 78.090. Laboratory analysis of the soil samples included gasoline range hydrocarbons (GRO), diesel range hydrocarbons (DRO), residual range hydrocarbons (RRO) and benzene, toluene, ethylbenzene, and xylene (BTEX) compounds. The five confirmation soil samples were non-detect for GRO and BTEX with trace concentrations of DRO detected, well within applicable cleanup levels. Stockpile samples had trace levels of GRO and BTEX in a few of the samples and DRO concentrations ranged from 33.7ppm to 3,610ppm.

Following removal of the USTs, a lined and covered soil stockpile totaling an estimated 220 cubic yards of contaminated soil was constructed on-site in accordance with 18 AAC 78.274 to prevent water run-on and run-off. Stockpile soils were sampled and then treated with fertilizer to promote natural biodegradation of the residual petroleum in the soil until a final Corrective Action Plan for the soil could be prepared. At the request of the Department by letter dated December 23, 2002, the stockpile was spread and sampled in accordance with the Storage Tank Procedures Manual on April 26, 2003.

Corrective Action
As a qualified professional in accordance with 18 AAC 78.271, your consultant obtained a representative sampling of the on-site soil stockpile to characterize its current condition prior to submitting a corrective action plan. Analytical results indicated the petroleum concentrations in the stockpile soil are now below applicable cleanup levels and additional remediation of the soil is unnecessary. The Department approves release of the soils for placement in an environmentally non-sensitive area 100 feet or more from surface water, a private water system as defined in 18 AAC 80.1990, a Class C public water system as defined in 18 AAC 80.1990, or a fresh water supply system that uses groundwater for a use designated in 18 AAC 70.020(a)(1)(A) and 18 AAC 70.050(a)(2); and 200 feet or more from a water source serving a Class A or Class B public water system, as defined in 18 AAC 80.1990.

Cleanup Levels

Soil

ADEC has determined that the migration to groundwater cleanup levels for soil, found in 18 AAC 75.341, Tables B1 and B2, are applicable to this site and are as follows for the over 40-inch precipitation zone.

Compound	*Cleanup Level*
GRO	260 mg/kg
DRO	230 mg/kg
RRO	8300 mg/kg
Benzene	0.02 mg/kg
Toluene	4.8 mg/kg
Ethylbenzene	5.0 mg/kg
Xylenes	69.0 mg/kg

Groundwater Use Determination

Groundwater at a site is considered to be a potential drinking water source unless a responsible person demonstrates or the department determines otherwise. In accordance with 18 AAC 75.350, ADEC has determined that the water potentially underlying the site:

- Is not currently used for a private or public drinking water source, is not within the zone of contribution of an active private or public drinking water system, and is not within a recharge area for a private or public drinking water well, a wellhead protection area, or a sole source aquifer;
- Is not a reasonably expected future source of drinking water; and
- will not be transported to a groundwater source that is currently or reasonably expected potential future source of drinking water.

Ecological Receptors

Ecological receptors are not present at the site. No potential migration pathways are present to transport contaminants to off-site ecological receptors.

Cumulative Human Health Risk

For detectable contamination that remains on-site following a cleanup, a cumulative risk determination will be calculated under 18 AAC 75.325(g). A chemical that is detected at one-tenth or more of the Table B1 inhalation or ingestion values set out in 18 AAC 75.341(c) or the Table B2 values set out in 18 AAC 75.341(d) must be included when calculating cumulative risk under 18 AAC 75.325(g).

Determination
The investigation and cleanup of petroleum contamination associated with the removal of USTs from Tatsuda's Gas At Last facility has met all requirements specified in 18 Alaska Administrative Code (AAC) 75 Article 3 - Discharge, Reporting, Cleanup, and Disposal of Oil and Other Hazardous Substances and 18 AAC 78, Underground Storage Tanks. Based on the information provided by your consultant, groundwater use at the site and in the area, and human health and ecological risks, ADEC agrees that no further remedial action is required. Record of this Decision Letter is posted on the Department database and the site given a closed status.

Closure
In accordance with 18 AAC 75.380(d)(1) and 18 AAC 78.276, additional investigation and cleanup may be required if new information is discovered which leads ADEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195- 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 of the permit decision. **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 of this decision letter. If a hearing is not requested within 30 days, the right to appeal is waived.

Please contact me with questions or concerns by telephone (907) 465-5210 or by e-mail at Bruce_Wanstall@dec.state.ak.us

Sincerely,

Bruce Wanstall

Bruce Wanstall
Environmental Specialist

cc: Barry Hogarty, (TECS-AK)