



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of
Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

555 Cordova Street
Anchorage, Alaska 99501
Phone: 907.269.7503
Fax: 907.269.7649
dec.alaska.gov

File No: 2215.26.008

December 6, 2013

Mark Olsen
Shoreside Petroleum (Hoovers Movers)
2101 East 63rd Avenue
Anchorage, AK 99507

**Re: Decision Document: Shoreside Petroleum (Hoover's Movers)
Corrective Action Complete Determination**

Dear Mr. Olsen:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the referenced site. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

Site Name and Location:

Shoreside Petroleum (Hoovers Movers)
701 1st Street
Cordova, Alaska 99574

Name and Mailing Address of Contact Party:

Mark Olsen
Shoreside Petroleum
2101 East 63rd Avenue
Anchorage, AK 99507

DEC Site Identifiers:

File No: 2215.26.008
Hazard ID: 26152

Regulatory Authority for Determination:

18 AAC 75 and 18 AAC 78

Site Description, Background, and Cleanup Activities

The fuel piping and dispensing equipment associated with two regulated underground storage tanks (USTs) were removed at this site during August of 2010. One of the USTs was 9,000 gallons and contained gasoline; the other was 1,100 gallons and contained diesel. The USTs were not disturbed during replacement activities; only their tops were exposed. Impacted soil was identified beneath two former dispenser locations and contained elevated concentrations of gasoline range organics (GRO); diesel range organics (DRO); and benzene, toluene, ethylbenzene, and xylenes (BTEX) that

exceeded the Method 2 “Migration to Groundwater” cleanup levels for the over 40-inch precipitation zone, established in 18 Alaska Administrative Code (AAC) 75.341, Tables B1 and B2. The impacted soils were excavated and temporarily stockpiled onsite.

Following the removal of the UST piping and dispensing equipment, five confirmation soil samples, including a duplicate soil sample were collected from the base of the excavation, along the former piping runs and dispenser locations. These samples were analyzed for GRO, DRO, RRO, and BTEX. A concentration of benzene was detected in one of the confirmation soil samples at 0.0173 milligrams per kilogram (mg/Kg). Concentrations of toluene and xylenes were detected in several of the soil samples up to 0.103 mg/Kg and 0.270 mg/Kg, respectively. Diesel range organics (DRO) and residual range organics (RRO) were also detected up to 34.2 mg/Kg and 36.3 mg/Kg, respectively. None of the soil samples exhibited concentrations of analytes that exceeded the most stringent method two cleanup levels.

On September 28, 2010, the contaminated soils (approximately 3.53 tons) from the temporary soil stockpile were delivered to Emerald Alaska for disposal. On December 22, 2010, the contaminated soils were subsequently delivered to the Columbia Ridge Landfill in Arlington, Oregon.

Contaminants of Concern

As discussed above, contaminated soils remain below the approved cleanup levels following the removal of the fuel piping and dispensing equipment associated with the two USTs at this site. The primary contaminants of concern (COCs) at this site included:

- Residual Range Organics (RRO)
- Diesel Range Organics (DRO)
- Benzene
- Toluene
- Total Xylenes

Cleanup Levels

Concentrations of benzene, toluene, and total xylenes were detected in soil below the approved Method Two migration to groundwater cleanup levels for the over 40-inch precipitation zone, established in 18 AAC 75.341(c), Table B1. Concentrations of RRO and DRO were also detected in soil below the Migration to Groundwater cleanup levels established in 18 AAC 75.341 (d), Table B2. Groundwater was not encountered during field activities.

Table 1 – Cleanup Levels

Contaminant	Soil- Method Two, Direct Contact/ Ingestion (mg/Kg)	Soil-Method Two, Inhalation (mg/Kg)	Soil- Method Two, Migration to Groundwater (mg/Kg)	Maximum Concentrations of Analytes Remaining Onsite (mg/Kg)
Benzene	120	8.5	0.025	0.0173
Toluene	6,600	220	6.5	0.103
Total Xylenes	16,600	63	63	0.270
RRO	8,300	22,000	9,700	36.3
DRO	8,250	12,500	230	34.2

mg/Kg = milligrams per kilogram; RRO = residual range organics; DRO = diesel range organics

Exposure Pathway Evaluation

Following investigation and cleanup at 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 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	Contamination remains in surface soil, but is below direct contact and ingestion cleanup levels.
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is below direct contact and ingestion cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below inhalation and MTG (most stringent) cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Contamination remains in the sub-surface, but is below inhalation and MTG (most stringent) cleanup levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater contamination is not present.
Surface Water Ingestion	Pathway Incomplete	Surface water is not contaminated and is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Remaining contaminants do not have the potential to bioaccumulate in plants or animals; and all analytes are below approved cleanup levels.
Exposure to Ecological Receptors	De-Minimis Exposure	Contamination remaining in the surface and sub-surface soils are below direct contact, inhalation, and migration to groundwater cleanup levels.

Notes to Table 2: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be affected by the minimal volume or concentration 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

Remaining petroleum contamination in soil is below approved cleanup levels. This site will receive a “Closed” designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 78.600(h). A “site” [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure.)
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

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 feel free to contact me at (907) 269-7691.

Sincerely,



Joshua Barsis
Environmental Program Specialist III