



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No: 2245.26.039

December 15, 2014

Prathap Kodial
CPD Alaska, LLC
201 Arctic Slope Avenue
Anchorage, AK 99518

Re: Decision Document: CPD Alaska LLC, Springer Cardlock Facility
Corrective Action Complete Determination

Dear Mr. Kodial:

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the CPD Alaska LLC, Springer Cardlock Facility 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:

CPD Alaska LLC, Springer Cardlock Facility
485 East Outer Springer Loop
Palmer, AK 99645

Name and Mailing Address of Contact Party:

Prathap Kodial
CPD Alaska, LLC
201 Arctic Slope Avenue
Anchorage, AK 99518

DEC Site Identifiers:

File No: 2245.26.039
Hazard ID: 26219

Regulatory Authority for Determination:

18 AAC 75 and 18 AAC 78

Site Description and Background

Two 10,000-gallon underground storage tanks (USTs Number 1 and 2) were slated for closure at the CPD Alaska LLC, Springer Cardlock Facility site (UST Facility ID: 2296) located at 485 East Outer Springer Loop, in Palmer, Alaska. The two USTs were located adjacent to each other; one was utilized for the storage of gasoline (Tank Number 1) and the other for diesel (Tank Number 2). In October of 2013, several soil borings were advanced in the vicinity of the USTs in an effort to close the USTs in place (without removing them from the ground). Confirmation soil samples collected from several soil borings exhibited concentrations of benzene (up to 0.0526 mg/kg) that exceeded the most stringent ADEC cleanup criterion for benzene (0.025 mg/kg). Based on the elevated

benzene, the ADEC determined that a release had occurred and both USTs needed to be removed from the ground.

Contaminants of Concern and Cleanup Levels

Benzene and diesel range organics (DRO) were identified above the ADEC Method 2 Migration to Groundwater (MTG) cleanup levels for the under 40-inch precipitation zone, established in 18 AAC 75.34, Tables B1 and B2.

Table 1 – ADEC Cleanup Levels

Contaminant	Soil – MTG (mg/kg)	Soil – Direct Contact (mg/kg)	Soil – Inhalation (mg/kg)
DRO	250	10,250	12,500
Benzene	0.025	150	11

mg/kg = milligrams per kilogram

MTG = migration to groundwater

Characterization and Cleanup Activities

The USTs (Tanks 1 and 2) and their associated piping and dispensing equipment were removed in October 2013. Soils removed during excavation were field screened using a photoionization detector (PID) to evaluate for the presence of volatile organic compounds (VOCs) and were temporarily stockpiled based on field screening results. Two soil stockpiles were created, one for the gasoline contaminated soil and the other for the diesel contaminated soil. Confirmation soil samples collected from the base and sidewalls of the excavation indicated the DRO and benzene impacted soil remained in the excavation above the ADEC cleanup levels.

Further excavation commenced on November 8, 2013 in an effort to remove any remaining contamination from this site. The excavation was discontinued at approximately 25 feet below ground surface (bgs) because of the limits of the onsite equipment. The soils removed from the excavation were temporarily stockpiled accordingly. Confirmation soil samples were collected from the base of the excavation and were analyzed by an ADEC approved laboratory for gasoline range organics (GRO), DRO, residual range organics (RRO), and benzene, toluene, ethylbenzene, and xylenes (BTEX), and polynuclear aromatic hydrocarbons (PAHs). Excavation confirmation samples revealed that DRO and benzene remained in the northeastern portion of the excavation up to 4,100 mg/kg and 0.0495 mg/kg, respectively, both of which exceed their respective ADEC cleanup criteria. Following the excavation and sampling activities, approximately 644 tons of contaminated soil were transferred to Alaska Soil Recycling (ASR) for thermal treatment.

Four soil borings were advanced in September 2014 to delineate the vertical and horizontal extent of contamination. Three of the borings were advanced to 30 feet bgs, and one was advanced to 45 feet bgs. Groundwater was not encountered. At least one soil sample was collected from each soil boring and was analyzed for GRO, DRO, RRO, and BTEX. None of the soil samples exhibited contaminant concentrations above ADEC MTG cleanup levels.

Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not

exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

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	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface at 25 ft. BGS, but is below direct contact cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface at 25 ft. BGS, but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	No building are present onsite, and any remaining contamination is at 25 ft. BGS.
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	Contamination is located at least 25 feet bgs, and foraging activities not practical.
Exposure to Ecological Receptors	Pathway Incomplete	No terrestrial or aquatic routes are present.

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 the most stringent ADEC 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.

2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

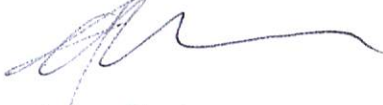
This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

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 99811-1800, 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 99811-1800, 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

cc: RFA via email at dec.spar.cr@alaska.gov
Kamie Willis, DOL (via email)