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: 2100.38.408

March 21, 2018

Terry Shurtleff
Alaska Industrial Hardware
2192 Viking Drive
Anchorage, AK 99501

Re: Addendum to Decision Document
Former Auto Salvage Yards site[1], 5655 Old Seward Highway, Anchorage

Dear Mr. Shurtleff:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) issues this addendum to the Cleanup Complete - Institutional Controls (CC-ICs) decision dated February 19, 2009 based on environmental work completed and land use changes associated with the commercial development of the Former Auto Salvage Yards site.

Work completed at the site after the 2009 decision was issued included extensive pre-construction earthwork for the approximately 50,000-sq-ft Alaska Industrial Hardware (AIH) warehouse store and associate utilities and parking areas. Based on the environmental work completed, including long-term groundwater monitoring, **all conditions of the 2009 decision are superseded and replaced by the conditions listed herein under Section VI, ADEC Decision; Cleanup Complete with Institutional Controls**. For the purposes of this addendum the term 'conditions' is interchangeable with 'Institutional Controls' (ICs). The terms 'site' and 'property' refer to the same area and are used interchangeably in this addendum.

ADEC's determination that contaminant concentrations remaining in soil and groundwater at the site do not pose an unacceptable risk to human health or to the environment has remained in effect continuously since the decision was issued. No further remedial action will be required as long as the site is in compliance with the established ICs and no new information becomes available that indicates residual contamination poses an unacceptable risk. **No additional groundwater monitoring is required and the three monitoring wells remaining at the site shown on Figure 1 below may be decommissioned.**

ADEC did not require characterization of contaminated soil beyond that which would be excavated for the foundation of the proposed AIH building and for installation of subsurface utilities at the site. This approach was reasonable given the documented widespread soil contamination at the site and on the previous

[1] Contaminated Sites database report and electronic copy of 2009 decision can be accessed at http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/2028

determination that the remaining contamination did not pose a risk to human health, safety, or the environment. The AIH store foundation design entailed excavation of non-structural[2] soil and/or contaminated soil to depths of 8-12 ft below ground surface and replacement with structural clean fill, with a perimeter foundation wall and slab on grade. Contaminated soil was documented in all areas that were excavated, and buried debris was frequently encountered during site work and is likely to be encountered in any future excavations beyond the horizontal and vertical limits of excavation during site work for construction of the AIH store. (See **Figure 2**, MOA parcel and **Figure 3**, Excavated Areas).

The environmental records that are the basis for this addendum and the decision, referred to as the administrative record, are located in ADEC's Anchorage office. The records that are the basis for this addendum are summarized below. Detailed site history prior to ADEC's February 2009 decision can be found in that decision document.

Figure 1
Excerpted Figure 2 from Geosyntec *DRAFT First Quarter 2016 Groundwater Monitoring Report* dated April 4, 2016.

Site name, location and legal description
Former Auto Salvage Yards
5655 Old Seward Highway
Anchorage, AK 99518
Alaska Industrial Hardware S/D,
Tract A

Name and Mailing Address of Contact Party
Terry Shurtleff, President/CEO
Alaska Industrial Hardware, A BSNC Company
2192 Viking Drive
Anchorage, AK 99501

ADEC Site Identifiers
File No.: 2100.38.408
Hazard ID.: 2028

Regulatory Authority for Determination
18 AAC 75 Oil and Other Hazardous Substances Pollution Control

[2] Non-structural soil refers to soil that is not suitable for engineering purposes

Site Description and Background

Based on the widespread soil and groundwater contamination at the property, the terms 'site' and 'property' refer to the same area and are used interchangeably in this addendum. The site and property are bounded by the Municipality of Anchorage (MOA) tax parcel having the address of 5655 Old Seward Highway.

Soil and groundwater contamination at the site primarily resulted from numerous surface releases of petroleum hydrocarbons associated with two vehicle salvage yards that operated on adjacent properties from as early as the 1960s through the mid-1990s. The two salvage yards were listed as separate sites by ADEC and both were conditionally closed by 2004 with residual soil contamination but no groundwater

Figure 2 - Site and property boundary
Property boundary for ~4-acre parcel comprising site at 5655 Old Seward Hwy.
(from Municipality of Anchorage (MOA) property appraisal http://www.muni.org/pw/public.html)

contamination documented at each site.[3] Site characterization completed in 2001 within the western half of the current site included installation of four monitoring wells that were drilled and screened up to 20 ft below the top of the groundwater table, which is generally present at the site from three to twelve ft below the ground surface. Metals concentrations in samples from the wells exceeded 18 AAC 75.345 groundwater cleanup levels for lead but were determined to be associated with particulates in the water rather than dissolved metals, based on the low recharge rates and turbid samples.[4]

During planning for an adjacent intersection upgrade in 2007 previously undocumented groundwater contamination was identified that exceeded ADEC cleanup levels. The 2009 decision[5] noted the presence of

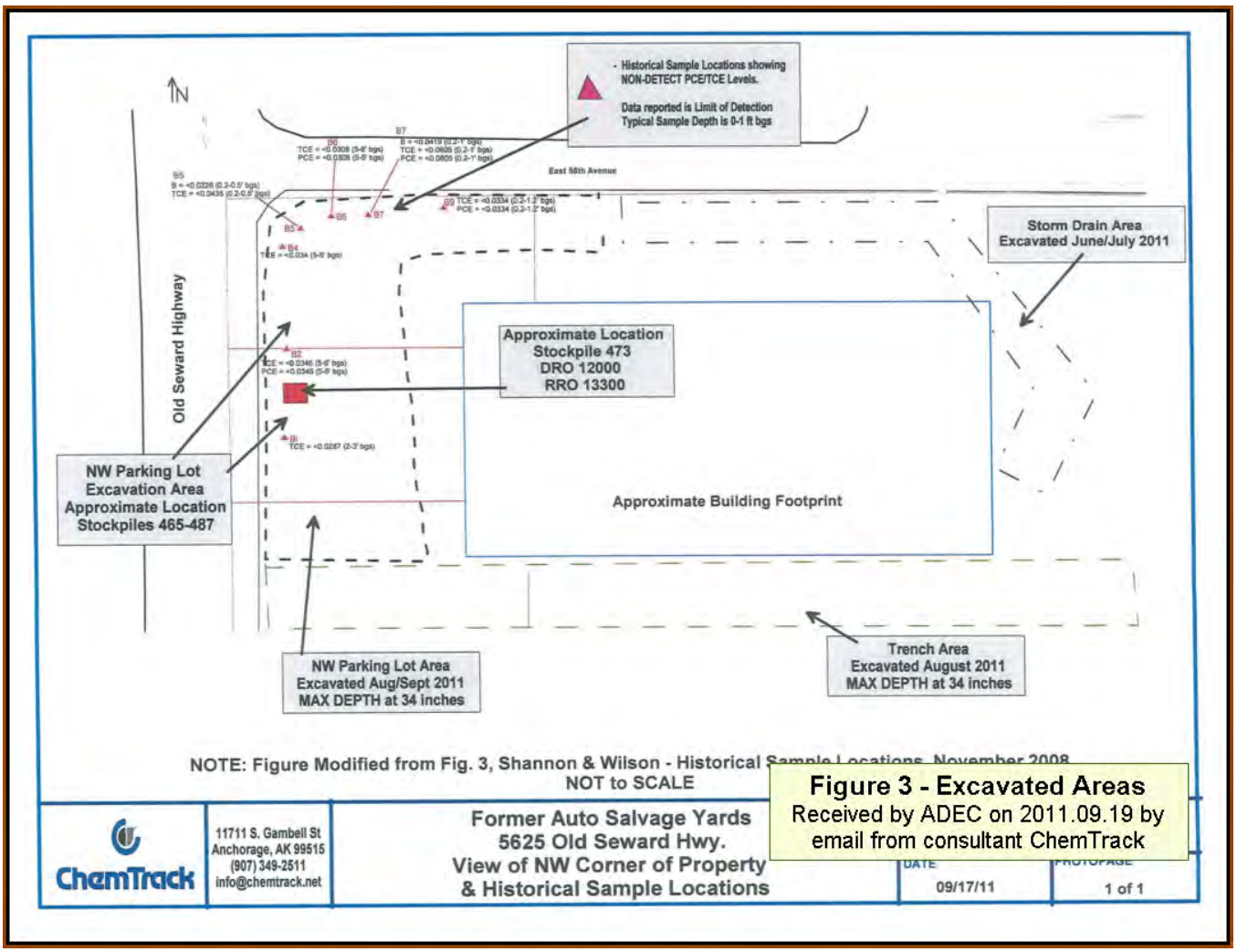
[3] The formerly used term 'Conditional Closure' was replaced by the current 'Cleanup Complete with Institutional Controls'; both referenced the status of sites that were closed with restrictions.

[4] Reported in *Final Site Characterization Report, Adrian Gray Estate Property, September 6, 2001* prepared by OASIS/Bristol Environmental Services.

[5] ADEC decision with subject line "Record of Decision (ROD) and modifications to Cleanup Complete – Institutional Controls (ICs) status" dated February 19, 2009, can be accessed on ADEC's online database at

groundwater contamination by petroleum hydrocarbons but retained conditional closure status as protective of human health, welfare and the environment for the current land use at that time as vacant, partially-paved land. The two sites were administratively combined into a single site in 2009 in anticipation of the properties being re-platted into a single tax parcel and developed by Alaska Industrial Hardware (AIH). The changed knowledge of site conditions (that is, the presence of groundwater contamination) and proposed change in land use necessitated modifications to the existing conditions of closure in the form of an addendum to the closure document.

This addendum summarizes environmental work completed at the site following issuance of the 2009 decision, including submitting for ADEC approval an environmental management plan prior to pre-construction excavation; monitoring and decommissioning existing monitoring wells; and installing and sampling additional groundwater monitoring wells. Site development by AIH from April 2010 through October 2011 entailed excavating, stockpiling, sampling and transporting off-site over 16,000 cubic yards of soil from the areas shown on Figure 3 below. Results of long-term groundwater monitoring of three wells at the site, completed in late 2016, showed that contaminant levels had stabilized or diminished.



http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/2028 or in the administrative record in ADEC's Anchorage office.

Soil and Groundwater Cleanup levels and Contaminants of Concern (COCs)
During the site investigation and cleanup activities at this site, samples were collected from soil and/or groundwater and analyzed for Gasoline Range Organics (GRO); Diesel Range Organics (DRO), Residual Range Organics (RRO), BTEX (benzene, ethylbenzene, toluene, xylenes); metals, Polychlorinated Biphenyls (PCBs); Volatile Organic Compounds (VOCs) and the Polynuclear Aromatic Hydrocarbons (PAHs): acenaphthene, acenaphthylene, anthracene, benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[g,h,i]pyrene, chrysene, dibenz[a,h]anthracene, fluoranthene, fluorene, indeno[1,2,3-c,d]pyrene, naphthalene, phenanthrene, and pyrene.

Soil
The contaminants listed in **Table 1** were detected above the applicable cleanup levels (18 AAC 75.341 Soil cleanup levels; Tables B1 and B2) in soil at the site and are considered Contaminants of Concern. Maximum contaminant levels encountered at the site are listed for investigations during the time periods before and after the February 2009 decision was issued. As noted above, ADEC did not require characterization of contaminated soil beyond that which would be excavated for the foundation of the AIH store, for parking lot upgrades or for installation of subsurface utilities at the site; therefore, the contaminant levels listed in **Table 1** for work done after the 2009 decision was issued do not represent *in situ* soil contaminant levels. Conversely, some of the pre-2009 Decision results and notably the DRO concentration of 11,600 mg/kg, represented contaminant concentrations remaining in soil at the time of closure.

Table 1 – Soil
Contaminants of Concern

Contaminants of Concern	ADEC Cleanup Level (mg/kg) Migration to Groundwater Pathway*	Maximum Levels (mg/kg) during investigations pre-2009 Decision	Maximum Levels (mg/kg) during investigations post-2009 Decision
GRO	300	663	610
DRO**	250	11,600	12,000
RRO**	11,000	21,000	13,330
Benzene	0.022	1.37	0.697
Ethylbenzene	0.13	7.23	27.8
Xylenes	1.5	122	96.2
Tetrachloroethylene (PCE)	0.19	0.223	--
Trichloroethylene (TCE)	0.011	0.0497	0.104
PCBs***	1.0	1.181	--
Lead and Compounds***	800****	578	1,010
Naphthalene	0.038	3.9	0.0543
Dichloroethylene, 1,2-cis-	0.12	0.207	--

*18 AAC 75.341 Method Two – Soil Cleanup Levels, Tables B1 and B2; <40 inch precipitation zone; Migration to Groundwater pathway.
** DRO and RRO levels exceed the respective ingestion levels of 10,250 mg/kg and 11,000 mg/kg; however, the site is fully paved or in the case of storm water swales, surface soil is clean fill, therefore the ingestion pathway is not considered complete and the migration to groundwater pathway is applicable.
*** The exposure pathway is Human Health (direct contact by ingestion). Migration to groundwater standards have not been established for these contaminants.
****For commercial or industrial land use, as applied in 18 AAC 75.340(e)(3), the soil cleanup level for lead is 800 mg/kg.

Groundwater

The contaminants listed in **Table 2** were detected above the applicable cleanup levels (18 AAC 75.345 Groundwater cleanup levels, Table C) in groundwater at the site and are considered Contaminants of Concern. Maximum contaminant levels in groundwater encountered at the site are listed for investigations during the time period before the February 2009 decision was issued.

Table 2 – Groundwater
Contaminants of Concern

Contaminants of Concern	ADEC Cleanup Level (mg/L)*	Maximum Levels (mg/L) 2001 and 2007-2010 investigations	Maximum Levels (mg/L) post-construction of AIH store 2015-2016
DRO	1.5	18.4	3.31
RRO	1.1	4.14	3.00
Benzene	0.0046	0.199	0.0554
Xylenes	0.190	--	0.330

*****mg/L = milligrams per liter

Characterization and Cleanup Activities

Requirements of the 2009 decision:

ADEC granted Cleanup Complete with Institutional Controls (CC – ICs) status in the decision dated February 19, 2009 during the planning stages for development of the site as a warehouse store. Institutional controls included submittal of an environmental management plan prior to site development work and installation and long-term monitoring of a minimum of four borings completed as monitoring wells. The monitoring requirements were based on the need to better characterize previously undocumented groundwater contamination by DRO and RRO identified along the northern area of the site in 2007[6] and to manage contaminated soil and groundwater likely to be encountered during preconstruction earthwork and if needed, dewatering. Based on the documented widespread soil contamination at the site and on the previous determination that the remaining contamination did not pose a risk to human health, safety, or the environment, ADEC did not require characterization of contaminated soil other than the soil that was excavated for the foundation of the proposed AIH building, parking lot upgrades and installation of subsurface utilities. The areas that were excavated are shown on **Figure 3**.

The AIH store foundation design entailed excavation of non-structural soil that was not suitable for engineering purposes to depths of approximately 8 to 12 ft below ground surface and replacement with structural clean fill, with a perimeter foundation wall and slab on grade. Diesel range organics (DRO) were found to be the limiting contaminant in site soils such that other compounds did not exceed the cleanup level if DRO did not.. Excavated soil with DRO above the 250 mg/kg site cleanup level following silica gel cleanup were transported off-site to Alaska Soil Recycling.

[6]Reported in May 2007 and December 2007 reports titled "*Easement Characterization, 56th Avenue and Old Seward Highway, Anchorage, Alaska*" and "*Soil and Groundwater Assessment, 56th Avenue and Old Seward Highway, Anchorage, Alaska*", respectively, prepared by Shannon & Wilson, Inc.

2009 Groundwater monitoring well installation and monitoring of existing and new wells

Initial work done to meet the requirements of the February 2009 decision was reported in a groundwater characterization report received in December 2009.[7] The report documented the July 2009 installation and sampling of soil and groundwater from four borings completed as monitoring wells B9MW, B10MW, B11MW and B12MW. Eleven monitoring wells that were previously installed remained at the site; of these, five wells (MW-2, B2MW, B4MW, B6MW and B8MW) were sampled and six wells (G1, G2, G3 and G4, installed in 1997, and B1MW and B5MW, installed in 2007) were decommissioned. Of the nine wells that were sampled, five wells including two of the newly installed wells exceeded applicable groundwater cleanup levels for DRO, RRO, and/or benzene.

One soil sample from each new boring was selected for analytical testing with the sample from B10MW exceeding the cleanup level for RRO and the cleanup level at that time for PCE; however, the PCE cleanup level became less stringent in 2016 so that the concentration of PCE would no longer exceed the current most stringent cleanup level of 0.19 mg/kg. PCE remains a contaminant of concern at the site because it was present at a concentration of 0.223 mg/kg in surface soil at the location of MW-2 in 2001, exceeding the current soil cleanup level.

2010-2011 Activities including Excavation and off-site transport of soil:

Pre-construction work for the AIH store began in 2010 and included excavating within the footprint of the AIH store approximately 8 to 12 feet below the ground surface and excavating to various depths for other purposes including utility trenches and parking lot upgrades. Sampling of excavated soil was done in general accordance with the *Revised Soil Management Plan* dated July 9, 2010 and prepared by ChemTrack, Inc. with conditional approval granted by ADEC's letter dated August 13, 2010. Soils were field-screened at a rate of 1 screening sample per each 10 cubic yard including use of a PID and field observations (visual and olfactory). Non-peat soil with a PID measurement of 2 or less could be reused. Soils with a PID measurement that was greater than 2 ppm would be sampled at a frequency of 1 per 25 cubic yards. ADEC's letter approved the re-use of excavated soil containing up to 1,000 mg/kg DRO as fill within the building footprint excavation, however, ultimately no excavated contaminated soil was used for this purpose.

Soils that did not exhibit olfactory or visual indications of fuel impacts and that had a PID measurement of 2 ppm or less were considered clean and approved for use as fill. Stockpiled soils that were sampled and determined to be less than 250 mg/kg DRO were considered clean. Soil containing only biogenic DRO was approved for disposal at Alaska Demolition's Palmer Monofill site. Soil containing between 250 and 1,000 mg/kg DRO was disposed of at the Anchorage Regional Landfill.

The single boring that contained lead at a concentration of 1,010 mg/kg, exceeding the 800 mg/kg commercial/industrial cleanup level and documented in a report by BGES, Inc.[8] was investigated by ChemTrack. ChemTrack's report dated May 5, 2010 did not identify soil containing elevated levels of lead.

ChemTrack advised ADEC in early August 2010 that all but three of ten monitoring wells remaining at the site were covered by stockpiles or were no longer usable. All remaining wells were decommissioned by

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[7] See *Groundwater Characterization, 5625 Old Seward Highway, Anchorage, Alaska, November 2009* prepared by Shannon & Wilson, Inc.

[8] Reported in letter report with subject line "Draft Summary of Soil Borings and Contaminated Soil Volume Calculations along Planned Utility Corridor and Within Proposed Building Foundation, 5625 Old Seward Highway" dated October 30, 2009 and prepared by BGES, Inc.

removal during subsequent site excavation activities. No additional monitoring took place until 2015, when four new monitoring wells were installed and monitoring began.

Reports by ChemTrack for the various phases and areas of excavation shown on **Figure 3** are listed in **Table 3**. Soil excavated from the northwest area of the site to a depth of up to 34 inches below ground surface as shown on Figure 3 totaled 1,457 tons or approximately 1,100 cubic yards using ChemTrack's estimate of 1.35 tons per cubic yard and was treated at Alaska Soil Recycling.[9] Soil excavated for the utilidor and storm drain reported in ChemTrack's April 2011 report totaled approximately750 cubic yards. Excavated soil from the 50,000 square ft warehouse store footprint to depths of 8 to 12 ft below ground surface would produce an estimated 14,800 to 22,200 cubic yards. Unspecified volumes of excavated soil meeting the 250 mg/kg site cleanup level for DRO were reused at the site so that the total volume of soil excavated from the areas shown on Figure 3 was not transported off site.

Report Title	Date Submitted
Lead Report	April 2010
Initial Excavation SAP Report	June 2010
Peat Stockpile Report	September 2010
Excavation Backfill Report	October 2010
Legacy S&G Stockpile SAP	October 2010
Peat Stockpile SAP Report	October 2010
Hot Sand & Gravel SAP Report	October 2010
Utilidor Excavation SAP Report	April 2011
DRO Summary for ASR	August 2011
DRO Summary for AIH	September 2011
HP-1-1 SAP Report	October 2011

Table 3: From P*roject Summary Report, Former Auto Salvage Yards, Revised April 2016*, prepared by ChemTrack Alaska, Inc.

2014 – 2016 Final cleanup report submittals by ChemTrack

ADEC's site status review letter dated December 29, 2014 summarized records submitted to ADEC for work done from 2010 through 2011 and requested a report of environmental work conducted at the site in accordance with contaminated sites regulations, to be submitted by March 31, 2015. Specifically, ADEC identified the regulations most relevant to the site as 18 AAC 75.325 (i), which requires that a responsible person obtain approval before disposing of soil or groundwater from a site that is subject to the site cleanup rules or for which a written determination has been received; and 18 AAC 75.380 Final reporting requirements and site closure (a), which requires submittal of a written final cleanup report for each site undergoing cleanup under the site cleanup rules.

ADEC reviewed the August 2015 report in a letter dated November 6, 2015 and requested additional information including copies of soil transport records and other documentation. ChemTrack submitted a revised summary report dated April 2016[10] that included much of the requested information but lists in **Table 5** below an additional 17,123 tons or approximately 12,600 cubic yards of soil that was reportedly transported to the landscaping firm Alaska Trailblazing during a single day. Backup documentation for this large volume of soil such as transport records, weigh tickets or invoices, or field notes by ChemTrack that identify the landscaping firm Alaska Trailblazing as the recipient of the soil was not provided in the April 2016 summary report or any other submittals to ADEC. ADEC learned of this disposal over four years after it took place. ADEC expected that the soil was to be transported to the property of Justin Green, owner of Alaska Demolition. In October 2010 ADEC approved the transport of soil containing up to 250 mg/kg DRO to Mr. Green's property for use as fill based on plans provided that showed adequate separation distances from surface water and other sensitive environments. The plans indicated that 10,000 to 20,000 cubic yards of fill would be used at the Green property, and ADEC specifically approved

[9] ASR weigh tickets worksheet provided by email Oct. 3, 2011 for soil delivered on Sept. 20, 2011.
[10] See *Project Summary Report, Former Auto Salvage Yards, 5625 Old Seward Hwy, Anchorage, Alaska, Revised April 2016.*

transport of 3,400 cubic yards to the property. Green's plans indicated that a much larger quantity of fill would be placed at the property and it was ADEC's expectation that soil containing any quantity of anthropogenic DRO would be transported to the Green property. When soil samples contain a combination of biogenic and anthropogenic compounds ADEC uses the non-silica results (that is, the results of analysis without silica gel removal) because there is no way of determining what percentage of the polar compounds removed by the silica gel is naturally occurring and what percentage comprises petroleum degradation products ADEC did not approve, nor was approval requested, to transport soil containing up to 250 mg/kg DRO to a landscaping firm as there is no means of controlling or tracking the final placement of the soil or assuring adequate separation distances are maintained.

ADEC communicated to ChemTrack that soil containing DRO that is not biogenic could not be placed within 100 feet of any area that is sensitive such as a wetland or within the protective radius of a drinking water supply system such as a Class A well.[11]

Table 5: From *Project Summary Report, Former Auto Salvage Yards, Revised April 2016*, prepared by ChemTrack Alaska, Inc.

8.0 SOIL DISPOSITION

Soils were transported off-site as follows

Location	Address	Dates Transported	Tons	Cubic Yards (1.35 Ton/CY)	DRO mg/Kg	Process
Alaska Soil Recycling	2301 Spar Avenue, Anchorage, AK 99501	17Mar2011-23Aug2011	7,178	5317.27	>1000	Thermal Remediation
Anchorage Regional Landfill	15500 E Eagle River Loop Road, Eagle River, AK 99577	23Aug2011	3,876.25	2,871	>250<1000	Landfill Disposal
AK Demo Palmer Monofill site	550 E Rebarchek Avenue, Palmer, AK 99645	23Aug2011-4Nov2011	10,940.50	8,104	Clean <250	Clean Fill Material
Justin Green's Residential Property	Anchorage, AK	10June2011	~405	~300	Clean <250	Clean Fill/Peat for Landscaping
Alaska Trailblazing	Anchorage, AK	15Sep2010	17,123.40	12,684	Clean <250	Clean Fill/Peat for Landscaping and Gravel

Table:3 Soil Disposition

Based on the lack of supporting documentation and the representation that over 12,000 cubic yards of soil was moved from the site to the landscaping firm in a single day, ADEC finds the records kept by ChemTrack to be unreliable and further finds that the additional information provided in the revised report does little to resolve discrepancies or data gaps in the record.

The summary reports demonstrate that there is a high likelihood that contaminated soil and/or debris will be encountered during any future excavation in those areas that have not been investigated or excavated horizontally and vertically (shown on Figure 3) given the highly contaminated soil encountered during 2011 excavations in the northwest portion of the site (also shown on **Figure 3**) and contractor field notes describing extensive buried debris encountered at the site. The contractor daily report by Renegade Equipment, LLC for August 15, 2011, provided in the appendices of the April 2016 summary report, states that "the north parking lot has crushed fuel tanks, car hoods, car bodies placed above and below the bottom of our excavation, making the grade uneven and creating a lower excavation at areas from the 6x6 power pole to the edge of the existing pavement west of the CEA Temp power pole." The contractor over-excavated and apparently removed some debris to one ft below the ground surface over a 20 ft by 80 ft area before placing geotextile over the excavated area and filling the excavation with gravel.

<u>2015-2016 Additional characterization and long-term groundwater monitoring by BGES and Geosyntec</u>

ADEC staff met with BGES, Inc. representatives and a representative of the prospective purchaser of AIH, Bering Straits Native Corporation (BSNC) in March 2015. Based on elevated groundwater contaminant

[11] Emails from ADEC chemist Earl Crapps, July 22, 2010 and from manager Rich Sundet, Oct. 1, 2010.

levels in former wells that were decommissioned during site development, ADEC requested additional characterization of site soil and groundwater.

Work was done in April 2015 in accordance with an approved plan and included completion of four borings, SB1 through SB4, with borings SB1, SB2 and SB3 completed as monitoring wells MW1A, MW2A and MW3A, shown on **Figure 1**.[12] Soil samples from borings SB1 and SB2 contained benzene concentrations that exceed the cleanup level of 0.022 mg/kg with respective benzene concentrations of 0.0529 mg/kg and 0.303 mg/kg. The groundwater monitoring wells were sampled with analysis for RRO, DRO and BTEX five times as shown on **Table 6** below. Groundwater monitoring results showed a diminished or stable trend and no further monitoring was requested.

Table 2
Groundwater Analytical Results

Date	Benzene	Toluene	Ethyl-benzene	o-Xylene	m,p-Xylene	Xylenes, Total	DRO	RRO
Units	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
GCL:	0.0046	1.1	0.015	0.191		10	1.5	1.1
MW1A								
4/16/2015	0.00111	<0.001	<0.001	-	-	<0.003	1.19	<0.5
3/10/2016	0.00653	<0.0005	<0.0005	0.330 J	<0.001	-	1.17	0.747
5/24/2016	0.00729 J	<0.0005	<0.0005	<0.0005	<0.001	-	0.976	0.677 J
8/30/2016	0.0126	<0.0005	<0.0005	<0.0005	<0.001	-	1.40 J	0.543 J
11/8/2016	0.0554	0.000440 J	<0.0005	<0.0005	<0.001	-	3.31	0.78
MW2A								
4/16/2015	0.011	<0.001	0.0019	-	-	0.00904	0.953	0.758
3/10/2016	0.00051	<0.0005	<0.0005	<0.0005	<0.001	-	0.938	0.499 J
5/24/2016	<0.0002	<0.0005	<0.0005	<0.0005	<0.001	-	1.45	1.37
8/30/2016	0.00117	<0.0005	<0.0005	<0.0005	<0.001	-	1.69	0.913
11/8/2016	0.00083	<0.0005	<0.0005	<0.0005	<0.001	-	1.12	0.811
MW3A								
4/16/2015	<0.0005	<0.001	<0.001	-	-	<0.003	0.766	0.694
3/10/2016	<0.00025	<0.0005	<0.0005	<0.0005	<0.001	-	2.88 J	3.00 J
5/24/2016	<0.00025	<0.0005	<0.0005	<0.0005	<0.001	-	0.325 J	0.375 J
8/30/2016	<0.00025	<0.0005	<0.0005	<0.0005	<0.001	-	0.370 J	<0.259
11/8/2016	<0.0002	<0.0005	<0.0005	<0.0005	<0.001	-	<0.500	<0.254

Notes:
[1] Xylene cleanup levels are based on total xylenes.
Highlighted cells exceed GCLs.
J = Estimated value
- = Not Analyzed

Table 6: From Geosyntec report *DRAFT 2016 Quarterly fndwater Monitoring 5655 Old Seward Highway, December 2016*

Cumulative Risk Evaluation

The site meets the cumulative risk standards for the current land use, which is a commercial / industrial setting with all land paved and with no groundwater use as drinking water.

Pursuant to 18 AAC 75.325(g) 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 meet the cumulative risk criteria for human health. Cumulative risk at this site was calculated assuming a commercial/industrial land use and using the highest detected concentrations of contaminants in all of the samples collected following cleanup actions through 2016. The potential cumulative risk is via the soil or groundwater ingestion pathway. The site meets the cumulative risk standards for the current land use, which is a commercial/industrial setting with all land paved and with no groundwater use as drinking water.

[12] Reported in *5655 Old Seward Highway, Anchorage, Alaska, Site Characterization Activities, May 2015* prepared by BGES.

The soil ingestion and human health pathways and groundwater ingestion exposure pathways are controlled as the remaining contamination at the site is sub-surface and institutional controls require that the property be paved and the pavement maintained, and water wells may not be installed without prior DEC approval and demonstrating that the groundwater is suitable for its intended use.

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 7 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De Minimis Exposure	Contamination is likely to be present in surface soil (0 to 2 feet below ground surface) but ground surface is required to be paved and maintained.
Subsurface Soil Contact	De Minimis Exposure	Contamination remains in the subsurface, but the site is required to be paved and the pavement maintained.
Inhalation – Outdoor Air	Pathway Incomplete	No volatile contaminants exceed the inhalation (human health) levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	No volatile contaminants exceed the inhalation (human health) levels.
Groundwater Ingestion	Exposure Controlled	An NEC has been recorded restricting installation of water wells without prior ADEC approval.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	The site is paved, so ecological receptors are not exposed to surface or subsurface soil.

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 institutional control in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

Revised Conditions applicable to ADEC CC/ICs Decision
The Cleanup complete with Institutional Controls status granted in February 2009 remains in effect subject to the revised institutional controls listed below. Petroleum contamination remains in surface and subsurface soil and in groundwater above levels suitable for unrestricted future use; however, these institutional controls limit potential future exposure and risk to human health or the environment. Complete characterization and cleanup was not practicable due to past heavy use of the site for vehicle salvage, the multiple source areas, and the widely distributed contamination. A cap in the form of a parking lot will be maintained over the residual contaminants and institutional controls will prevent exposure.

A Notice of Environmental Contamination and Institutional Controls (NEC-IC) has been recorded in the land records maintained by the Alaska Department of Natural Resources and a copy is attached to this letter.

The following institutional controls and standard conditions shall be maintained:

Institutional Controls

1. The Landowner agrees to notify ADEC prior to any sale or transfer of the property within 60 days of transfer and shall report to ADEC every 5 years to document the status of compliance with the institutional controls described in this notice. Such notice and the reports should be sent to the ADEC at:

   Alaska Department of Environmental Conservation
   Division of Spill Prevention and Response
   Contaminated Sites Program
   Attention: IC Unit
   P.O. Box 111800
   Juneau, AK 99811-1800

   or be submitted electronically to CS.Submittals@alaska.gov.

2. No groundwater wells shall be installed in the area covered by the institutional controls (the site, which coincides with the property boundary in this case) without prior DEC approval.
3. The cap shall be inspected annually and maintained as needed to prevent contact with subsurface contaminated soil, and/or infiltration of water and potential leaching of contaminants.
4. ADEC must be notified in advance of the subdivision or replat of the property associated with these institutional controls. The recorded Notice of Environmental Contamination must be included as part of future property transactions and attached to subsequent associated parcels.

Standard Conditions

5. ADEC approval is required prior to moving any soil or groundwater off any site that is, or has been, subject to the site cleanup rules (see 18 AAC 75.325(i)). 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. In the future, if soil will be excavated (or groundwater will be brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time and ADEC approval must be obtained before moving the soil or water off the property.
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
7. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional characterization and treatment may be required to ensure the water is suitable for its intended use.

ADEC has determined the cleanup is complete as long as the institutional controls are properly implemented and no new information becomes available that indicates residual contamination may pose an unacceptable risk.

The institutional controls will be removed in the future if documentation is provided that shows concentrations of all residual hazardous substances remaining at the site are below the levels that allow for

unrestricted exposure to, and use of, the contaminated media and that the site does not pose a potential unacceptable risk to human health, safety or welfare, or to the environment. Standard conditions 5-7 above will remain in effect after the ICs are removed.

This addendum was prepared in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if the institutional controls are determined to be ineffective or if new information indicates that contaminants at this site may pose an unacceptable risk to human health or the environment.

If you have questions about this addendum, please feel free to contact me at (907) 269-7527 or by email at eileen.olson@alaska.gov.

Sincerely,

Eileen Olson
Project Manager

Note: This letter is being transmitted to you in electronic format only. If you require a paper copy, let us know and we will be happy to provide one to you. In the interest of reducing file space, the Division of SPAR/Contaminated Sites Program is transitioning to electronic transmission of project correspondence.

Enclosures: Recorded NEC-IC Agreement which includes site Figure 3 showing areas that have been excavated and backfilled with fill that meets the site cleanup level of 250 mg/kg for DRO.

cc: Spill Prevention and Response, Cost Recovery Unit

CC

ALASKA

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Recording District 301 Anchorage
03/21/2018 10:15 AM Page 1 of 5

Notice of Environmental Contamination and Institutional Controls

Grantor: State of Alaska
Department of Environmental Conservation
Contaminated Site Program

Grantee: Terry Shurtleff
Alaska Industrial Hardware
2192 Viking Drive
Anchorage, AK 99501

Legal Description: Alaska Industrial Hardware S/D, Tract A

Recording District: Anchorage

Return to: Eileen Olson
Alaska Dept. of Environmental Conservation
Contaminated Sites Program
555 Cordova St.
Anchorage, AK 99501

State Business- No Charge

NOTICE OF ENVIRONMENTAL CONTAMINATION AND INSTITUTIONAL CONTROLS

As required by the Alaska Department of Environmental Conservation, pursuant to 18 AAC 75.375, Bering Straits Native Corporation (BSNC) the Landowner of the subject property, hereby provides public notice that the property located at 5655 Old Seward Highway, Anchorage, Alaska, 99518, and more particularly described as follows:

Alaska Industrial Hardware S/D, Tract A, Anchorage Recording District, Anchorage, Alaska

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 75, Article 3. This release and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/2028 under the site name Former Auto Salvage Yards site and Hazard ID number 2028.

ADEC and the Landowner have agreed that the institutional controls described below are necessary and appropriate and shall be maintained and be binding on the Landowner and its agents, successors and assigns. If the Landowner transfers, sells, assigns, leases or subleases the property or any portion of the property covered by the institutional controls, the Landowner shall incorporate a copy of this notice into the documents of transfer, sale, assignment, lease or sublease.

ADEC has reviewed and approved, subject to the institutional controls described below, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site as long as the institutional controls remain in place and effective and no new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment.

ADEC determined, in accordance with 18 AAC 75.325 – .390, referred to as the site cleanup rules, that cleanup has been performed to the maximum extent practicable even though residual petroleum hydrocarbon contaminated soil and groundwater remain at the site. Complete characterization and cleanup was not practicable due to past heavy use of the site for vehicle salvage, the multiple source areas, and the widely distributed contamination. A cap in the form of a parking lot will be maintained over the residual contaminants and institutional controls will prevent exposure.

The following institutional controls and standard conditions shall be maintained:

Institutional Controls

1. The Landowner agrees to notify ADEC prior to any sale or transfer of the property within 60 days of transfer and shall report to ADEC every 5 years to document the status of compliance with the institutional controls described in this notice. Such notice and the reports should be sent to the ADEC at:

Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
Attention: IC Unit
P.O. Box 111800
Juneau, AK 99811-1800

or be submitted electronically to CS.Submittals@alaska.gov.

2. No groundwater wells shall be installed in the area covered by the institutional controls (the site, which coincides with the property boundary in this case) without prior DEC approval.
3. The cap shall be inspected annually and maintained as needed to prevent contact with subsurface contaminated soil, and/or infiltration of water and potential leaching of contaminants.
4. ADEC must be notified in advance of the subdivision or replat of the property associated with these institutional controls. This recorded Notice of Environmental Contamination must be included as part of future property transactions and attached to subsequent associated parcels.

Standard Conditions

5. ADEC approval is required prior to moving any soil or groundwater off any site that is, or has been, subject to the site cleanup rules (see 18 AAC 75.325(i)). 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. In the future, if soil will be excavated (or groundwater will be brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time and ADEC approval must be obtained before moving the soil or water off the property.
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
7. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional characterization and treatment may be required to ensure the water is suitable for its intended use.

Attached **Figure 3** shows the approximate property boundaries and locations of existing structures and areas that were excavated during site development from 2010 to 2011. Future excavations beyond the horizontal and/or vertical extent of these areas are likely to encounter contaminated soil and/or buried debris.

Failure to comply with the institutional controls described herein may result in ADEC reopening the site and requiring additional site characterization and cleanup.

In the event that new information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, further site characterization and cleanup may be necessary under 18 AAC 75.325-.390.

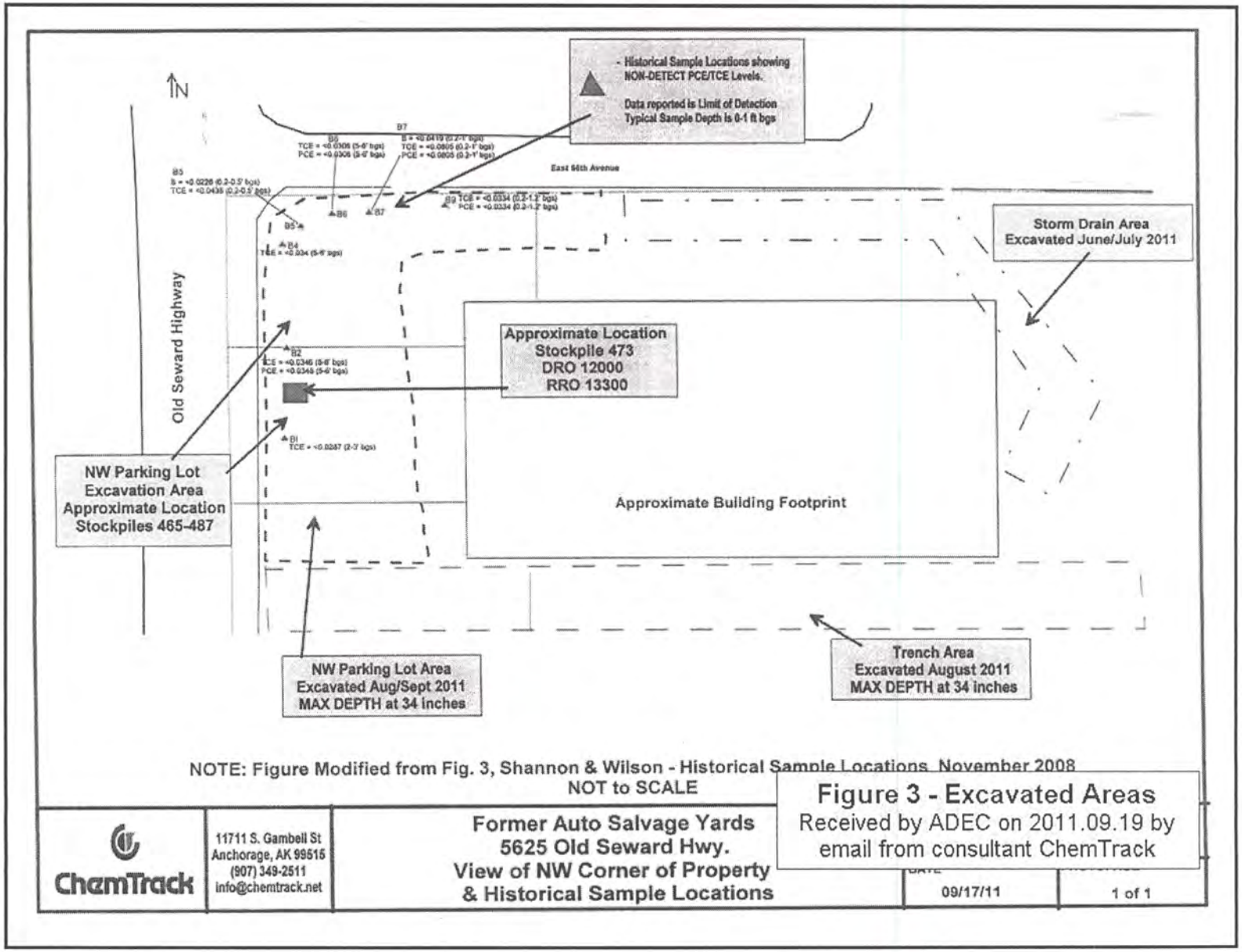
This notice and the institutional controls remain in effect until a written determination from ADEC is recorded that documents contaminants remaining at the site have been shown to meet the residential use soil cleanup levels defined in 18 AAC 75.340 and groundwater cleanup levels in Table C within 18 AAC 75.345.

For more information on the contaminated site in this notice, see ADEC Contaminated Sites Program file number 2100.38.408 for the site named Former Auto Salvage Yards and online database entry at http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/2028.

Eileen Olson
Signature of Authorized ADEC Representative

3/21/2018
Date

Eileen Olson
Printed Name of Authorized ADEC Representative



NOTE: Figure Modified from Fig. 3, Shannon & Wilson - Historical Sample Locations November 2008
NOT to SCALE

ChemTrack	11711 S. Gambell St Anchorage, AK 99515 (907) 349-2511 info@chemtrack.net	Former Auto Salvage Yards 5625 Old Seward Hwy. View of NW Corner of Property & Historical Sample Locations	09/17/11	1 of 1

Figure 3 - Excavated Areas
Received by ADEC on 2011.09.19 by email from consultant ChemTrack