THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

Division of Spill Prevention and Response
Contaminated Sites Program

610 University Avenue
Fairbanks, AK, 99709
Main: 907.451.2911
Fax: 907.451.2155
www.dec.alaska.gov

File No: 100.26.176

January 3, 2019

Certified Mail, Return Receipt Requested
Article No. 7016 2140 0000 1907 7919

Via electronic and certified mail
Scott Grigsby
Avis System Licensee
4900 S. Aircraft Drive
Anchorage, Alaska 99502

Re: Decision Document: FIA - AVIS Rent-A-Car
Cleanup Complete Determination – Institutional Controls

Dear Mr. Grigsby:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the contaminated site FIA – AVIS Rent-A-Car located at 6309 Old Airport Way, 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 and no further remedial action will be required as long as the institutional controls are maintained and effective.

This Cleanup Complete with Institutional Controls (ICs) determination is based on the administrative record for the FIA – AVIS Rent-A-Car site which is located in the offices of the ADEC in Fairbanks, Alaska. This decision letter summarizes the site history, cleanup actions, regulatory decisions, and specific conditions required to effectively manage remaining contamination at this site.

Site Name and Location:
FIA – Avis Rent-A-Car
6309 Old Airport Way
Fairbanks, Alaska 99701

Name and Mailing Address of Contact Party:
Scott Grigsby
Avis System Licensee
4900 S. Aircraft Drive
Anchorage, Alaska 99502

ADEC Site Identifiers:
File No: 100.26.176
Hazard ID: 24805

Regulatory Authority for Determination:
18 AAC 75 and 18 AAC 78

Site Description and Background
The site is a rental car business located on Block 3, Lot 17 of the Fairbanks International Airport. Soil and groundwater contamination was discovered at the site during a 3,000-gallon gasoline underground storage tank (UST) removal on July 23, 1998. A soil sample taken from beneath the tank contained 14,000 milligrams per kilogram (mg/kg) gasoline range organics (GRO) and 76 mg/kg benzene. Sheen was observed on the groundwater in the excavation. During the UST removal, 100 cubic yards (cy) of contaminated soil were removed and treated at Organic Incineration Technology, Inc. (OIT). Contamination remained in soil at the excavation limits and in groundwater.

Wien Lake is adjacent to the site and the groundwater flows in a northwesterly direction towards the lake. The property is not connected to public water; the facility relies on bottled water for drinking and a portable outhouse for bathroom facilities. A water supply well at the north corner of the building provides water for automobile washing. Wash water is collected and pumped to the public sewer.

Contaminants of Concern
During the site investigation and cleanup activities at this site, samples were collected from soil, groundwater, and pore water. Sample analyses included Gasoline Range Organics (GRO); Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX); 1,2-Dibromoethane; Polynuclear Aromatic Hydrocarbons (PAHs); and Lead. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- GRO
- Benzene
- Toluene
- Ethylbenzene
- Total Xylenes

Cleanup Levels
Gasoline range organics, and BTEX were detected in soil above the approved Method 2 migration to groundwater cleanup levels for the under 40-inch precipitation zone, established in 18 AAC 75.341(c), Table B1 and 18 AAC 75.341(d), Table B2.

Gasoline range organics, benzene, toluene, and ethylbenzene exceeded groundwater cleanup levels established in 18 AAC 75.345 Table C.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)	Groundwater (µg/L)
GRO	300	2200
Benzene	0.022	4.6
Toluene	6.7	1100
Ethylbenzene	0.13	15
Total Xylenes	1.5	190

mg/L = milligrams per liter
ug/L = micrograms per liter

Characterization and Cleanup Activities
A release investigation was performed in 2006 that included the installation and sampling of three soil borings, completion of the three borings as monitoring wells (MW-1, -2, and -3), sampling the monitoring wells and sampling the on-site water well. Soil samples from the three borings exceeded the soil cleanup levels for GRO and BTEX. The on-site water well was sampled and did not contain contaminants of concern. Levels of BTEX and GRO were measured above groundwater cleanup levels in the three monitoring wells. Five additional groundwater monitoring wells were installed in 2008, MW-4 to MW-8. Figure 1 shows the location of all monitoring wells on the property. Groundwater monitoring results from samples collected from the eight wells in 2008 found that benzene contamination was migrating from the former UST location and moving towards the northwestern property line.

Because elevated levels of benzene were present in monitoring well MW-7 and concern that the contaminant plume may reach Wien Lake, a pore water sample was collected in 2009 from a temporary well point installed at the edge of Wien Lake to a depth of about one foot. The sample result did not indicate the presence of GRO or BTEX above laboratory reporting limits. Monitoring wells MW-6, -7, and -8, located along the shore of Wien Lake, were sampled from 2008 until 2017. Monitoring well MW-7 was sampled more frequently because of the elevated benzene levels.

Field screening and soil sampling from soil borings installed in 2010 indicated a contaminated area approximately 30 feet by 60 feet remained around the former UST, concentrated largely in the groundwater smear zone approximately 13 feet below ground surface. In an effort to address groundwater contamination, approximately 660 cy of contaminated soil was excavated from the source area in 2010 and thermally treated at OIT. Soils were excavated to a maximum depth of 13 feet bgs, and groundwater was reported to be between 12 and 13 feet bgs. The excavation was centered near the former UST and monitoring well MW-1. Nine confirmation soil samples were collected from the sidewalls and ten samples from the base of the excavation. Results indicated that soil contamination remained in the smear zone, and in the vadose zone below 4 ft bgs at various locations along the excavation boundary, particulary along the northwestern and southern excavation limits (GRO in sidewall samples was 859 mg/kg in northwestern corner, and 1,500 mg/kg in southern corner). Contaminant levels in the groundwater decreased over time, particularly after the 2010 excavation when a large amount of contaminated soils were removed.

In 2011, soils were sampled during the installation of one monitoring well (MW-9) at 5 foot intervals. This monitoring well was placed southwest of the 2010 excavation where the most-contaminated soil sample was collected during the 2010 excavation. Benzene, ethylbenzene, and total xylenes were found above the soil cleanup levels at the groundwater smear zone (12 to 12.5 feet below ground surface), but all other contaminants of concern were below.

Groundwater samples were again collected September 22, 2016 in the five monitoring wells MW-5, MW-6, MW-7, MW-8, and MW-9 to understand the current status of the contaminant plume in a period of high groundwater. Groundwater sample results were all below groundwater cleanup levels for BTEX and GRO. Another sample event was conducted in the on July 26, 2017 when groundwater levels are traditionally low. Six wells were sampled during this time: MW-3, MW-5, MW-6, MW-7, MW-8, and

MW-9. Groundwater sample results, again, were all below groundwater cleanup levels for BTEX and GRO. All monitoring wells were decommissioned in accordance with ADEC guidance in September 2018.

Cumulative Risk Evaluation

Cumulative risk at this site was calculated assuming a residential land use and using the highest detected concentrations of contaminants in all of the samples collected following the cleanup action in 2010. The results indicate a cumulative carcinogenic cancer risk of 12 in 100,000 and a non-carcinogenic hazard index of 4, suggesting that the hazardous substances on site exceed the cumulative carcinogenic cancer risk and the noncarcinogenic risk standard.

The ingestion and outdoor inhalation exposure pathways from soil are controlled as the remaining contamination at the site is sub-surface and institutional controls are in place to prevent future excavations without prior ADEC approval.

Exposure Pathway

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, except for Direct Contact with Surbsurface Soil, which was determined to be a Future Exposure. 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	Exposure Controlled	In 2010, contamination remained in sub-surface soil above ADEC's Table B1 human health and Table B2 ingestion cleanup levels. An agreement has been signed for Institutional Controls restricting sub-surface soil excavation without characterizing soil.
Inhalation – Outdoor Air	Exposure Controlled	In 2010, contamination remained in the sub-surface soil above ADEC's Table B1 human health and Table B2 inhalation cleanup levels. An agreement has been signed for Institutional Controls restricting sub-surface soil excavation without characterizing soil.
Inhalation – Indoor Air (vapor intrusion)	Exposure Controlled	Soil contamination remains in the smear zone and in the vadose zone at the north and south ends of the former excavation. An agreement has been signed for Institutional Controls restricting

		building construction without first addressing the potential for vapor intrusion.
Groundwater Ingestion	De Minimis Exposure	Sample results from 2017 for BTEX and GRO were less than the groundwater cleanup levels for the six wells sampled, as well as the on-site well.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site. Porewater and groundwater well samples near Wien Lake documented contaminants of concern well below the groundwater cleanup levels.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern have not been found in porewater and groundwater samples, indicating contamination is not migrating to surface waters of Wien Lake.
Exposure to Ecological Receptors	Pathway Incomplete	Contamination is only present in the sub-surface.

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.

ADEC Decision

Petroleum contamination remains in sub-surface soil above levels suitable for unrestricted future use; however ADEC has approved the use of institutional controls to limit potential future exposure and risk to human health or the environment. A Notice of Environmental Contamination and Institutional Controls (NEC-IC) has been placed in the airport leasing files maintained by the Fairbanks International Airport's Leasing office and a copy is attached to this letter. The NEC-IC document has been included in the file review by the Airport's Leasing Manager during building permit review in order to ensure compliance with the institutional controls.

Groundwater meets the applicable cleanup levels at the approved points of compliance, shown in the figure included in the attached NEC-IC Agreement, the groundwater contaminant plume has been demonstrated to be shrinking and the contaminant concentrations are decreasing. Therefore, ADEC has determined the residual soil contamination does not pose an unacceptable migration to groundwater concern.

Institutional controls necessary to support this closure determination include:

1. The responsible party/leassee or Airport Leasing agrees to notify ADEC prior to any sale or transfer of the property 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

410 Willoughby Avenue, Ste. 105
Juneau, AK 99811-1800

or be submitted electronically to DEC.IC Unit@alaska.gov.

2. Any future building construction in the area covered by the institutional controls must include design and construction techniques that will prevent volatile contaminants in soil from migrating into the building.

3. In the event that the remaining contaminated soil is brought to the surface in the future, Airport Leasing shall notify ADEC and characterize and, if determined necessary, cleanup the soil.

Standard site closure conditions that apply to all sites include:

1. 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 78.600(h)]. A "site" as defined by 18 AAC 78.995(134) 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 it must be characterized and managed following regulations applicable at that time and ADEC approval must be obtained before moving the soil off the property.

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

Communication with the Fairbanks International Airport Environmental and Leasing staff indicate that the following procedures are in place to manage ICs.

- NEC-IC agreement will be filed in the FIA leasing files for Block 3, Lot 17, FIA.
- Any parties planning construction or excavation projects on the airport must apply for a building permit with the leasing department.
- Prior to approval of the permit, the application is reviewed by the environmental manager for review and approval.
- The environmental manager will review environmental files at that time to determine if ICs are in place in the area where construction or excavation are planned.
- The environmental manager will ensure that the construction or excavation project will comply with the applicable ICs and will notify ADEC in advance of any characterization or cleanup efforts.
- In the event that FIA staff become aware of a violation of the ICs, FIA staff will immediately notify ADEC's IC Unit at DEC.ICUnit@alaska.gov.

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 ADEC Contaminated Sites Database will be updated to reflect the change in site status to "Cleanup Complete with Institutional Controls" and will include a description of the contamination remaining at the site.

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 9-11 above will remain in effect after ICs are removed.

This determination is in accordance with 18 AAC 75.380 and 18 AAC 78.276(f) 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.

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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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, P.O. Box 111800, 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)451-2911 or email at Laura.Jacobs@alaska.gov.

Sincerely,

Laura Jacobs
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: Signed IC Agreement - NEC
Figure 1. Avis Rent-A-Car, Site Map

cc: Spill Prevention and Response, Cost Recovery Unit
Lisa Maserjian, Bethel Environmental Solutions
Ashley Jaramillo, ADOT&PF-Fairbanks International Airport

Notice of Environmental Contamination and Institutional Controls

Grantor: Fairbanks International Airport,
Alaska Rent-A-Car, Inc., and
Avis Rent-A-Car

Legal Description: Block 3, Lot 17 Fairbanks International Airport

Recording District: Fairbanks

Return to: Alaska Department of Environmental Conservation – Contaminated Sites Program
610 University Avenue, Fairbanks, Alaska 99709-3643

NOTICE OF ENVIRONMENTAL CONTAMINATION AND INSTITUTIONAL CONTROLS

As required by the Alaska Department of Environmental Conservation, pursuant to 18 AAC 75.375, Alaska Department of Transportation & Public Facilities - Fairbanks International Airport, the Landowner of the subject property, hereby provides public notice that the property located at: 6309 Old Airport Road, Fairbanks, Alaska, 99709, and more particularly described as follows:

Block 3, Lot 17, Fairbanks International Airport

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 78, Article 2. This release and cleanup are documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at http://www.dec.state.ak.us/spar/csp/db_search.htm under the site name FIA – Avis Rent-A-Car and Hazard ID number 24805.

By signing this notice, 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 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though residual fuel-contaminated soil exists on-site. Further cleanup was determined to be unnecessary because further cleanup was not practicable and contaminated soil remains at depths of 12.5 feet or more below ground surface.

The following institutional controls and standard conditions shall be maintained:

1. The Landowner agrees to notify ADEC prior to any sale or transfer of the property 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
410 Willoughby Avenue, Ste. 105
Juneau, AK 99811-1800
or be submitted electronically to DEC.ICUnit@alaska.gov.

2. Any future building construction in the area covered by the institutional controls must include design and construction techniques that will prevent volatile contaminants in soil/groundwater from migrating into the building.

Standard site closure conditions that apply to all sites include:

1. ADEC approval is required prior to moving any soil off any site that is, or has been, subject to the site cleanup rules [see 18 AAC 75.325(i), and 18 AAC 78.600(h)]. A "site" as defined by 18 AAC 75.990 (115) and 18 AAC 78.995(134) means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

2. In the future, if soil will be excavated will be brought to the surface, 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.

Attached is a diagram drawn to scale that shows property lines, locations of existing structures, the former tank location, excavation limits, the approximate location and extent of remaining soil contamination which is subject to the institutional controls described in this notice, and the locations where confirmation soil samples were collected.

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 or 18 AAC 78 Article 2.

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. For more information on the contaminated site in this notice, please see ADEC Contaminated Sites Program file number 100.26.176 for the site named FIA – Avis Rent-A-Car.

Theresa L Hennig — 2/5/18

Signature of Property Leasing Manager, Fairbanks International Airport

Date

Theresa L. Harvey

Printed Name of Property Leasing Manager,
Fairbanks International Airport

Signature of Authorized ADEC Representative

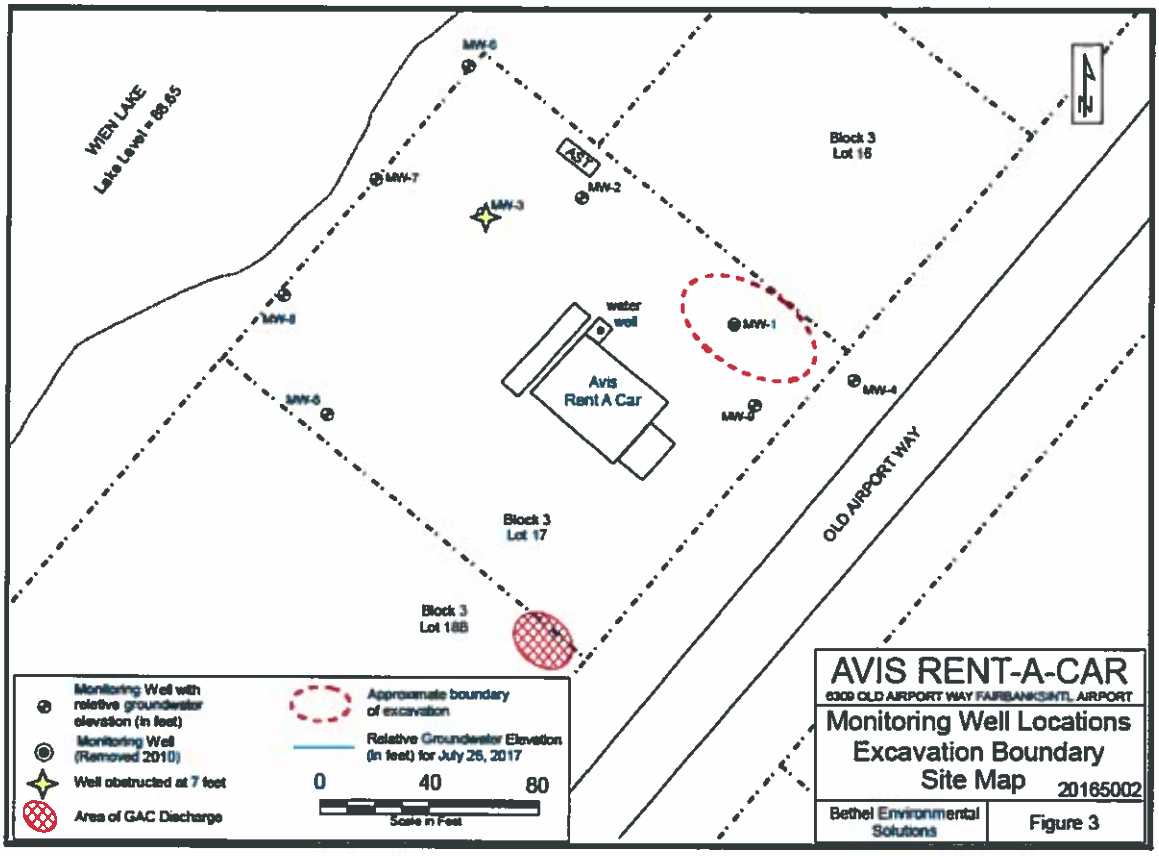
2/8/18

Date

Laura Jacobs

Printed Name of Authorized ADEC Representative

Aerial photo


WIEN LAKE
Lake Level = 86.65
MW-6
MW-7
MW-3
AST
MW-2
Block 3
Lot 16
water well
MW-1
MW-8
Avis
Rent A Car
MW-5
MW-9
MW-4
OLD AIRPORT WAY
Block 3
Lot 17
Block 3
Lot 18B
Monitoring Well with relative groundwater elevation (in feet)
Monitoring Well (Removed 2010)
Well obstructed at 7 feet
Area of GAC Discharge
Approximate boundary of excavation
Relative Groundwater Elevation (in feet) for July 26, 2017
0
40
80
Scale in Feet
AVIS RENT-A-CAR
6309 OLD AIRPORT WAY FAIRBANKS INTL AIRPORT
Monitoring Well Locations
Excavation Boundary
Site Map
20165002
Bethel Environmental Solutions
Figure 3

Site figure

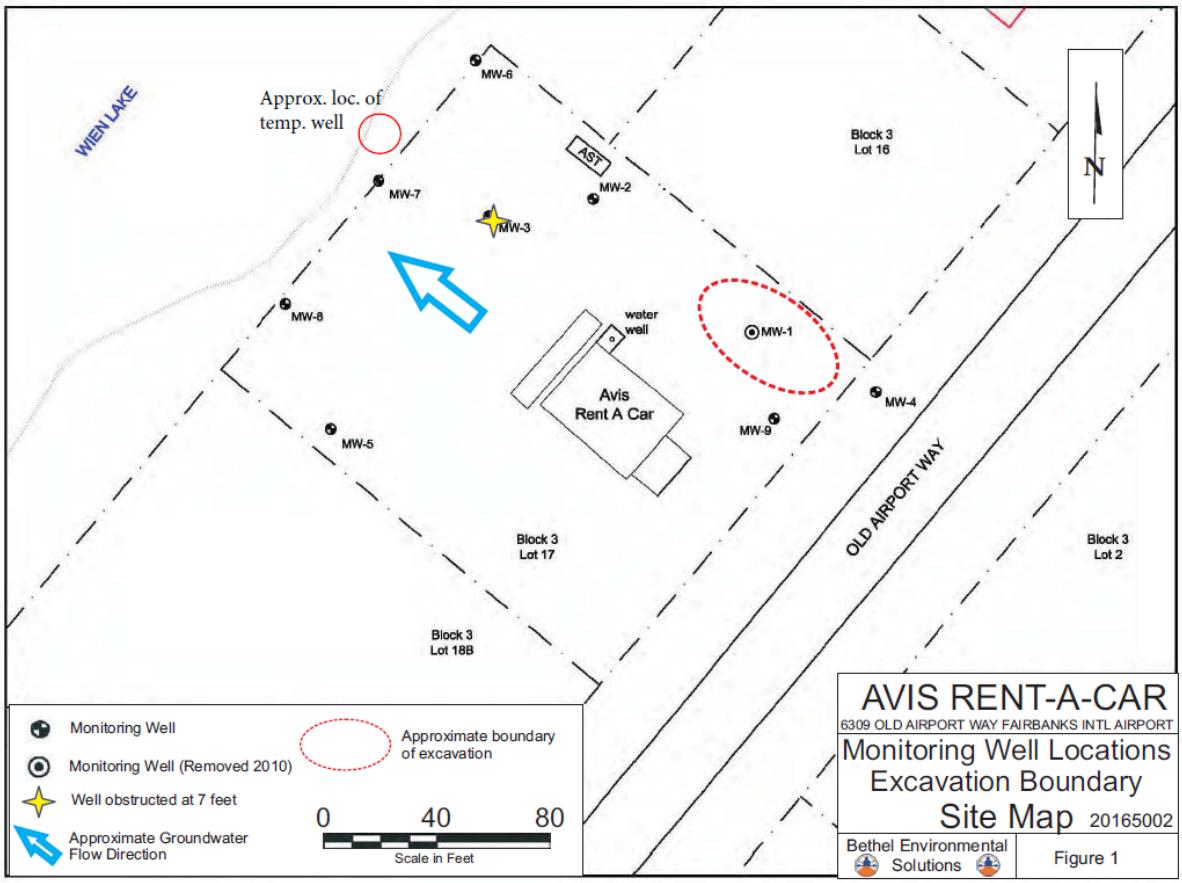


Figure 1: Location of monitoring wells, pore water sample, and contaminated soil excavation.