

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
STORAGE TANK PROGRAM
KENAI AREA OFFICE

TONY KNOWLES, GOVERNOR

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January 25, 1999

Mr. Ed Saltz
Saltz General Contractors
P.O. Box 747
Soldotna, Alaska 99669

RE: Saltz General Contractors
UST Facility ID#: 422
Underground Storage Tank (UST) Site Assessment Report

Dear Mr. Saltz:

On October 8, 1998, the Kenai Area Office of the Alaska Department of Environmental Conservation (ADEC), received an Underground Storage Tank Removal and Soil Sampling report for the above referenced facility. Northern Test Lab prepared this report on your behalf. The report was dated September 25, 1998, and generally covered soil sampling and assessment activities associated with the closure of two USTs at your facility in August, 1998.

We consider this report to be incomplete. A copy of Northern Test Lab's report for your facility is attached. Also attached is a copy of the section of the regulations that describe the information required to be included in a site assessment report. We have circled the pertinent items that have not been included in your report.

We have also attached some sections from the September 22, 1995, Underground Storage Tanks Procedures Manual. These sections from the UST Procedures Manual identify the reporting requirements associated with site assessment and sampling activities.

In addition to these general comments, the following specific comments are offered at this time:


- 1) One of the two tanks was reported to contain diesel fuel, however no diesel range organics (DRO) analyses were supplied with the report.
- 2) Soil samples are to be collected from under the fill pipe end, and the center, of the tanks. Furthermore, soil samples are to be collected from native soils located at

an elevation that is below, and within two feet of the bottom of, the excavated pit. Soil sampling depths and locations were not provided in the report. These locations are required so that we can evaluate compliance with ADEC regulations.

We are requesting that a complete Site Assessment report be developed and submitted to our office, in accordance with 18 AAC 78.090(d)(5). Copies of this letter, as well as the attachments, are also being sent to Northern Test Lab. We are available to meet and coordinate with you or Northern Test Lab in our efforts to receive a complete report. Upon receipt of a complete report, our review of the Site Assessment report for your UST facility will resume.

Please contact me if there are any questions regarding this request. My phone number is 262-5210, extension #250.

Sincerely,


Paul Horwath, P.E.
Environmental Engineer

pdh.saltzed1.doc

Attachments

c: Paula Crowley, Northern Test Lab, Soldotna – with Attachments

(5) within 60 days after closure or change-in-service, the owner or operator shall provide to the department a site assessment report that includes a compilation of the information collected and results obtained under (1) - (4) of this subsection and

(A) the owner's name and address;

(B) the operator's name and address, if different from the owner;

(C) the location of the UST, including the legal description

(i) by subdivision lot, block, or tract information; or by section lot, tax lot, or government lot number; or

(ii) by meridian, township, range, section, and nearest quarter section locations within the section if the location cannot be described under (i) of this subparagraph;

(D) the UST registration number assigned by the department;

(E) the name and business address of each person who supervised the site assessment;

(F) a site sketch that approximately shows

(i) the location and configuration of tanks and piping;

(ii) the sample locations, including depth below grade;

(iii) the proximity to property, buildings, and residences;

(iv) any sites where a release has occurred;

(v) any sites where free product has been or is located;

(vi) the facility and property boundaries;

(vii) a bar scale and north arrow; and

(viii) any other pertinent information;

(G) a narrative description of activities conducted at the site and the dates the activities occurred;

(H) any historical information encountered during the assessment regarding a previous release, repair, spill, or cleanup; and

(I) the data report required in the *UST Procedures Manual*, Section 8.4;

(e) The collection of field data and the interpretation and reporting of site characterization and site assessment data must be conducted or supervised by a qualified, impartial third party in accordance with the *UST Procedures Manual*.

(f) The department will, in its discretion, and on a site-specific basis, waive the use of an impartial third party required by (e) of this section if the owner or operator documents to the department's satisfaction that work performed under (e) of this section will be conducted or supervised by a qualified and objective person. To meet the requirements of this subsection, the owner or operator shall submit

(1) a resume of the person qualified to conduct or supervise the work to be performed under (e) of this section showing relevant education, vocational training, related work experience, and any special training, license, certificate, or registration held by that person; and

(2) for a company, agency, utility, or municipality with environmental staff, a description of the supervisory and organizational structure related to the person identified in (1) of this subsection.

(g) Laboratory analyses submitted to fulfill the requirements of this section must be performed by a laboratory approved by the department under 18 AAC 78.800 - 18 AAC 78.810.

(h) If site assessment sampling began before November 3, 1995, and if test results satisfy the water quality criteria and cleanup levels referred to in (i) of this section, the owner or operator may continue to use the analytical methods used before that date to complete the site assessment. If a site assessment is begun on or after November 3, 1995, the owner or operator shall use the analytical methods set out in Table G in 18 AAC 78.800(b).

(i) Further investigation is not required if

(1) the assessment, observations, and investigations of the UST site indicate that a release has not occurred; and

(2) the test results indicate that

(A) there is no contaminated groundwater or surface water;

(B) the applicable water quality criteria adopted in 18 AAC 70.020(b) for compounds of concern that are considered toxic or other deleterious organic or inorganic substances under that subsection have not been exceeded; and

(C) the cleanup levels set out in 18 AAC 78.315 have not been exceeded.

(6) the sample was composited before analysis, unless compositing of the sample is explicitly specified by this chapter or approved by ADEC in the workplan required under 18 AAC 78;

(7) the sample jar was not clean before soils or water were deposited into it;

(8) the sample was incorrectly labeled (or not labeled) and field records do not show the location where the sample was collected;

(9) a water sample from a boring or well was not collected in accordance with Section 4.7 of this chapter;

(10) an improper analysis method was performed on the sample;

(11) the analysis of the sample was conducted by a laboratory that was not approved by ADEC at the time of analysis.

8.4 Data reporting

8.4.1 Information to be included in reports

Reports prepared under this chapter must, at a minimum, contain the following:

(1) the laboratory's data summary as required by Section 8.4.2 (Laboratory data reports for samples) for each sample analyzed;

(2) an interpretation of data and sampling results, as required by the tasks discussed in Section 8.3 (Final data validation);

(3) a table that contrasts the required field quality control data (discussed in Section 9.1.1) with the limits specified by this chapter (see Report Format subsection below);

(4) a case narrative for the project;

(5) a separate section or attachment that discusses all deviations from procedures outlined in this chapter and any relevant information compiled from field records or other information required by 18 AAC 78 including a discussion of any deviations from this chapter for any sampling or analytical methods and procedures, whether used by the assessment firm or by the laboratory;

(6) for corrective action sampling activities, a separate section or attachment that discusses all corrective actions taken as required by Section 10, and any other corrective action for other deviations from this chapter including corrective action (such as resubmission of the sample) for sample results that fall within a factor of 2 of the action level after having had corrections for matrix interferences applied (see discussion in Section 10.5 (Corrective actions with laboratory));

(7) a summary of the site assessment or release investigation information, provided to the owner or operator on a form available from ADEC (Site Assessment and Release Investigation Summary Form, see Appendix B), or similar format containing the same information; and

(8) other items required for reports by 18 AAC 78.

8.4.2 Laboratory data reports for samples

For each project conducted under this chapter, a data transmittal summary must be provided for each sample analyzed by the laboratory, including all field and laboratory QC samples, whether the samples are rejected or not. The following items must be submitted in the report:

- (1) laboratory name, address, telephone number, fax number (if available), LAN number, and the name of the person authorizing release of laboratory data;
- (2) report date;
- (3) type of analysis (gasoline, diesel, etc.);
- (4) the analytical and extraction method used and method number (see Tables 1 and 2);
- (5) the type of matrix;
- (6) the field sample number;
- (7) the laboratory sample number;
- (8) laboratory file identification number;
- (9) the date sampled;
- (10) the date received;
- (11) the date extracted and digested;
- (12) the date analyzed;
- (13) the location of the sample collection point;
- (14) the site or project name;
- (15) the concentrations of analyte (reported in micrograms per liter for liquids, milligrams per kilogram, dry weight basis for solids);
- (16) definitions of any characters used to qualify data;

4.2 Documentation of sampling procedures

A field log book or another type of field record must be used to document the collection of samples and site data. This record should include:

- (1) the name of each qualified person on site supervising or conducting a characterization, assessment, or investigation;
- (2) the date and time of sampling;
- (3) weather conditions, including temperature, wind speed, humidity, and precipitation;
- (4) the name of each person who physically collected the samples;
- (5) clear photographs of site, bottom of excavation, and removed tanks;
- (6) the results of an inspection of the tank and piping for corrosion;
- (7) a site sketch that, at a minimum, shows
 - (A) locations of all known present and past USTs, piping and pump islands, including UST identification numbers assigned by ADEC;
 - (B) distances from tanks to nearby structures;
 - (C) property line locations;
 - (D) sampling locations and depths and corresponding sample ID numbers;
 - (E) any release sites;
 - (F) any free product sites;
 - (G) scale; and
 - (H) a north arrow.

When appropriate, the site sketch should include the following relevant features:

- (1) a description of the size of the excavation;
- (2) field instrument readings;
- (3) location of stockpiled soils;
- (4) depth, width, and type of backfill material used to surround tanks and piping;

- (5) soil types;
- (6) utility trenches;
- (7) wells within 100 feet;
- (8) depth to groundwater or seasonal high groundwater level; and
- (9) surface drainages, including potential hydraulic connections with groundwater.

4.3 Pre-sampling activities

Before conducting field sampling activities, the site background information, inspect site conditions shall be compiled as provided in Sections 4.3.1 and 4.3.2, and the necessary notifications shall be made to agencies as provided in Section 4.3.3.

4.3.1 Site background

Before beginning field work, the following information must be collected and recorded:

- (1) the names, addresses, and telephone numbers of the owner, operator, and businesses on the site;
- (2) for rural areas, the quarter section, township, and range of the site;
- (3) locations of all present and past USTs, piping and pump islands;
- (4) a description of known UST systems, including capacity, dimension, age, and material of construction and location and types of fill and vent pipes, valves, and connectors;
- (5) history of types of products stored in the tanks;
- (6) history of known releases and available data from previous soil or groundwater sampling at the site;
- (7) type and classification of native soil;
- (8) location of wells within 100 feet of the site;
- (9) surface waters and wetlands in the immediate vicinity of site;
- (10) depth to groundwater or seasonally high groundwater level;
- (11) property line locations;

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APPENDIX B
ADEC Storage Tank Program
Site Assessment and Release Investigation Summary Form

This document summarizes information from site assessments and release investigation reports that are required by Alaska's Underground Storage Tanks Regulations (18 AAC 78). It is intended to ensure minimum requirements are met when submitting full reports to ADEC. It cannot be substituted for comprehensive site assessment or release investigation reports. Site assessments (as defined in AS 46.03.450) are conducted to check for the presence or absence of petroleum contamination. If contamination of soil or groundwater is identified then a release investigation is required. Site assessments and release investigations must be conducted by a qualified impartial third party (as defined in 18 AAC 78) and in accordance with chapter two of the Underground Storage Tanks Procedures Manual (UST Manual).

How to fill out this form

Type or print in ink the requested information and sign in ink the "signature" blocks on page 7. Please attach this form to the comprehensive site assessment or release investigation report (or include it in the report introduction) and submit it to the nearest ADEC field operations office (Juneau, Anchorage, Fairbanks or Soldotna).

1. **General Information**

**Purpose of
Site assessment/
Release investigation:**

(Closure, Change-in-service, Suspected or confirmed release, Compliance check, Other)

Owner of site:

Name of company/legal entity that owns the site Phone number

Mailing address City, State, Zip code

Operator of site:

Name of company/legal entity that operates the site Phone number

Mailing address of operator City, State, Zip code

Location of site:

Name of site (e.g. John Doe's Service Station) Phone number

Physical address of site (be as specific as possible) City, State, Zip code

Legal description of site Section/township/range

Type of business at site Facility ID # / Tank ID number(s)

**Financial Assistance
Applications filed
(this site only)**

Site assessment/
tightness test Tank cleanup Tank upgrade Tank closure

**Reports on file
with ADEC:**

Tightness test Closure notice Other _____

2. System and tank status

Describe the status, size, and contents of the tanks that have been at the site:

Tank ID Number:	Tank No. ____	Tank No. ____	Tank No. ____	Tank No. ____	Tank No. ____
Tank status (check one)					
Currently in use	_____	_____	_____	_____	_____
Temporarily closure	_____	_____	_____	_____	_____
Closed/left in place	_____	_____	_____	_____	_____
Closed/removed	_____	_____	_____	_____	_____
Total capacity (gallons)	_____	_____	_____	_____	_____
Contents (diesel, etc)	_____	_____	_____	_____	_____

3. Firm conducting site assessment and release investigation

Name of firm

Phone number

Mailing address

City, State, Zip code

Site assessment supervisor(s)

Person(s) collecting samples

4. Site history

Based on the best available knowledge, please check the appropriate box below:

Y N

- Was soil contamination observed or identified?
- Was groundwater contamination observed or identified?
- Did inventory control or prior tank repairs indicate a possible release?
- Has a tank tightness test been performed on any USTs on the site?
- Have any of the facility's USTs or piping ever failed a tightness test?
- Have there been any previous site assessments performed at this site?
- Do previous site assessments indicate any contamination has occurred?

If the answer to any of these questions is yes, please describe (or attach copy of report discussion). Give dates and circumstances, use continuation sheet if necessary:

5. Field screening analysis

Date(s) of field screening: _____ Temperature(s) during screening: _____
Estimated wind speeds: _____ Weather (clear, raining, etc): _____
Type of field detection instrument used: _____
Brand: _____ Model: _____ Date calibrated: _____
Number of tests: _____ Range of results: _____
If an instrument wasn't used, what field detection method was used? _____
Number of tests: _____ Range of results: _____

6. Collection of soil samples

For site assessments done for USTs remaining in place

Check the appropriate boxes below (if not applicable, leave blank):

- | | | |
|--------------------------|--------------------------|--|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Were samples taken from borings (or test pits) within 5 feet of the UST? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were samples collected from within 2 feet below the bottom of the UST? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were dispensers connected to the UST system? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were samples taken from borings (or test pits) adjacent to dispensers? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were samples taken from borings (or test pits) adjacent to piping? |

How many borings/pits were made? _____ How many samples were analyzed? _____

For site assessments done at excavation and removal of USTs:

Check the appropriate boxes below (if not applicable, leave blank):

- | | | |
|--------------------------|--------------------------|---|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Were any areas of obvious contamination identified or observed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were samples taken from areas of obvious contamination? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were at least two discrete analytical samples taken from excavated pit area? |
| <input type="checkbox"/> | <input type="checkbox"/> | Was at least one sample taken from below each dispensing island's piping? |
| <input type="checkbox"/> | <input type="checkbox"/> | Was at least one sample taken from the piping trench? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were the samples referenced above collected taken from native soil within two feet below the bottom of the tank pit or dispenser/piping trench? |
| <input type="checkbox"/> | <input type="checkbox"/> | If multiple tanks were removed, were at least three samples collected? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were additional samples collected for each 250 square feet of excavated pit over 250 square feet? |

Number of distinct points sampled: _____ Estimated excavation's surface area: _____

For all site assessments

Check the appropriate boxes below:

- | | | |
|--------------------------|--------------------------|---|
| Y | N | |
| <input type="checkbox"/> | <input type="checkbox"/> | Were field duplicate samples collected and analyzed? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were all samples kept at the appropriate temperature until analysis? |
| <input type="checkbox"/> | <input type="checkbox"/> | Were all samples extracted & analyzed within recommended holding times? |
| <input type="checkbox"/> | <input type="checkbox"/> | Did chain-of-custody/transfer logs accompany samples to laboratory? |

7. Laboratory analysis of soil samples

Identify the possible contaminants (gasoline, BTEX, diesel, etc.): _____

Please list the analytical methods used to detect these contaminants in the soil samples, the number of samples analyzed by each method, and the range of results for each method:

Possible product	Analytical method	Number of samples	Range of results	Location(s) of sample point(s) w/ highest level of contamination
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

8. Groundwater investigation

Check the appropriate boxes below:

Y N

- Was groundwater encountered during the excavation or drilling work?
- Were borings drilled/pits dug at least five feet below the USTs bottom?
- Is groundwater or seasonal high water table known or suspected to exist within five feet of the bottom of the USTs?
- Were samples taken from borings drilled/test pits dug to this water level?
- Were all these samples analyzed within recommended holding times?

How many groundwater/saturated-soil samples were collected & analyzed? _____

How many of these samples were taken from the top 6" of water table? _____

How many field QC samples were analyzed? _____

Trip blanks Duplicates Decon blanks

9. Laboratory analysis of water samples

(see Table 1 of UST Procedures Manual or Table G of 18 AAC 78.800(b))

Identify the possible contaminants at the site: _____

Identify the analytical methods used to detect these contaminants in the water samples, the number of samples analyzed by each method, and the range of results for each method:

Analytical method	Number of samples	Range of results (ppm)	Location(s) of sample point with highest level of contamination
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

10. Disposal of material

Check the appropriate boxes below (if not applicable, leave blank):

Y N

— Were tanks cleaned in accordance with API 2015 (Cleaning Petroleum Storage Tanks)?

— Were the tanks and piping removed and disposed in accordance with API 1604 (Removal and disposal of used petroleum Storage tanks)?

Where were the tanks and piping disposed? _____

Where was the tank sludge and rinsewater disposed? _____

11. Stockpiles

Check the appropriate boxes below:

Y N

— Is any soil stockpiled at the site?

— Are soils stockpiled in accordance with 18 AAC 78.311?

12. Release investigation

Check the appropriate box below:

Y N

— Was any petroleum contamination identified during site assessment?
(Answer "yes" if any evidence a release occurred; if no, proceed to item 13)

If contamination was found, what was matrix score for site? _____
(Attach completed matrix score sheet to this form)

When did release occur? _____ When was release confirmed? _____
(Date & time) (Date & time)

When was ADEC notified? _____ List ADEC staff notified: _____
(Date & time) (Name)

What is status of UST that prompted the investigation? _____
In use Out-of-use, product still in system Out-of-use; system empty Permanently closed

Briefly describe (or attach copy of report discussion) the steps taken to prevent further migration of the release and steps taken to monitor and mitigate fire and safety hazards: _____

13. Site sketch

Sketch the site in the space below. Alternatively, attach a site map to the back of the form. The sketch (or accompanying narrative) should include the following information:

- locations of all USTs, piping, and dispensers
- distances from tanks to nearby structures
- property line locations
- location and dimensions of excavation(s)
- type of backfill used to surround system
- locations of any known historical releases
- locations of any observed contamination
- location of any boreholes and test pits
- soil types
- field screening locations and readings
- sampling locations, depths, & sample ID numbers
- water wells and monitoring wells (if present)
- depth to groundwater/seasonal high groundwater
- locations of any stockpiled soils
 - north arrow
- bar scale (specify feet or meters)

For release investigations, in addition to the above information, show the groundwater gradient; surface drainages (including potential hydraulic connections with groundwater) and utility trenches.

14. Quality assurance

Check the appropriate boxes below:

- | | | |
|---|---|---|
| Y | N | |
| — | — | Were there deviations from Chapter 2 of the UST Procedures Manual? (Note that any deviations must be documented in a section of the comprehensive report) |
| — | — | Is a field quality control summary included in the reports? |
| — | — | Is a laboratory QC summary included in the report for all samples used to verify cleanup levels have been met? |

15. Certification

The following certification is to be signed by the assessment firm's principal investigator or Quality Assurance Officer:

I certify that except as specifically noted in this report, all statements and data appearing in this report are in conformance with the provisions of Chapter 2 of the UST Procedures Manual.

(Print name)

(Title)

(Signature)

(Date)

The following certification is to be signed by the UST owner/operator (or designated representative):

I certify that I have personally examined and am familiar with the information in this and all attached documents and based on my inquiry of the individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

(Print name)

(Specify if owner, operator, representative)

(Signature)

(Date)

(Street Address)

(City, State, Zip)

16. Attachments

Please check the boxes showing any comprehensive reports attached to this summary:

- ____ Site Assessment Report (include if no release investigation is needed)
____ Release Investigation Report (include if release investigation is needed)