

# STATE OF ALASKA

SEAN PARNELL, GOVERNOR

## DEPT. OF ENVIRONMENTAL CONSERVATION

### DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

555 Cordova Street  
Anchorage, AK 99501  
PHONE: (907) 269-7526  
FAX: (907) 269-7649  
www.dec.state.ak.us

File: 2100.26.024  
Certified Mail Return Receipt  
Article No: 7010 2780 0000 2178 4797

July 20, 2011

Becky Brown  
One Williams Center  
P.O. Box 3483, MD 48-6  
Tulsa, Oklahoma 74172

Re: Decision Document; Former Williams Express Store #5009  
Corrective Action Complete Determination-Institutional Controls

Dear Ms. Brown:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the project file and environmental records associated with the Former Williams Express Store #5009. This site is located at 1209 Gambell Street in Anchorage. 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 site is in compliance with established institutional controls.

This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Corrective Action Complete with Institutional Controls (ICs) determination.

#### **Introduction**

##### Site Name and Location:

Former Williams Express Store #5009  
1209 Gambell Street  
Anchorage, Alaska 99501

##### Name and Mailing Address of Contact Party:

Becky Brown  
One Williams Center  
P.O. Box 3483, MD 48-6  
Tulsa, Oklahoma 74172

ADEC Site Identifiers

File: 2100.26.024

Hazard ID: 23847

Regulatory authority under which the site is being cleaned up:

18 AAC 75 and 18 AAC 78

**Background**

The property was operated as a filling and vehicle maintenance station until it became a car rental business around 1985. It is currently occupied by Denali Car Rental. No discrete releases or spills are documented for this site.

The on-site sources of petroleum hydrocarbons at WES No. 5009 are former Underground Storage Tanks (USTs), associated piping and dispensers, and potential leaking drums. In addition, a surface release was suspected to have migrated to the subsurface via monitoring well MW-3. This was suspected because free product was observed in this well in March 1995 and June 1999 but free product was not observed during the UST removals.

Soil samples collected at this site have been tested for benzene, toluene, ethylene, and xylenes (BTEX), total petroleum hydrocarbons (TPH), diesel range organics (DRO), TPH as gasoline, gasoline range organics (GRO), residual range organics (RRO), halogenated volatile organics (HVO), polychlorinated biphenyls (PCBs), glycol, and metals. Groundwater samples collected at the site have been tested for BTEX, DRO, TPH, GRO, and HVOs.

**Site Characterization and Cleanup Actions**

Five soil borings advanced during a 1987 site assessment found concentrations up to 6.8 mg/kg benzene as well as toluene, ethylbenzene, and xylenes above Method Two "Migration to Groundwater" (MTG) cleanup standards near the southern end of the pump islands. One sample collected contained xylenes at 310 mg/kg which is above the Method Two, Table B1 Outdoor Inhalation and MTG cleanup levels, but not Direct Contact criteria.

In 1989, a tank assessment effort included removal of about 350 cubic yards of contaminated soil. Soil sampling showed concentrations remaining up to 1.3 mg/kg 1,4-dichlorobenzene, 0.5 mg/kg tetrachlorethylene, 0.3 mg/kg trichloroethylene, and 16,000 mg/kg TPH. Some excavation was limited to preserve the integrity of the onsite building. Additional soil sampling was conducted in 1990 in order to install monitoring wells and to further delineate the petroleum soil contamination. A sample submitted for HVO was nondetect for all compounds. During 2007, monitoring wells were placed on the property located adjacent to the south, which contained DRO up to 10,300 mg/kg. In 2009, a monitor well was installed on property adjacent to the southwest, and did not contain soil contamination.

Twenty years of groundwater data show that the plume is stable or decreasing. Measurable product was observed in MW-3 in 1995 and 1999. No product was observed during soil and tank excavations, and further evaluation suggested that the source of the free product had been surface release based on fuel-stained ice in the well head monument.

Benzene and DRO have been the primary contaminants of concern in groundwater at this site. The highest DRO concentrations have been found in onsite wells MW-3 and MW-6 in the area of the former UST arrays; and in offsite well MW-5. Benzene has not been detected above ADEC Table C cleanup levels in any of these wells since 1993.

A drinking water well survey within a 0.25-mile radius of WES 5009 site was conducted in 1990 by RZRA, Inc. Based on the results of the 1990 survey and a review of AWWU records in January 2008, it was concluded there are no drinking water wells in the site vicinity.

Remedial efforts have included soil excavation, operation of a vapor extraction (VES), and application of a nutrient to enhance bioremediation.

### Contaminants of Concern

- Diesel range organics (DRO)
- Benzene
- Ethylbenzene
- Toluene
- Xylenes
- 1,4-dichlorobenzene
- Tetrachlorethylene
- Trichloroethylene

### Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Table B2 Under 40 inch Zone, Migration to Groundwater (MTG).

Contaminants of Concern	MTG Site Cleanup Level (mg/kg)
• Diesel Range Organics	250
• Benzene	0.025
• Ethylbenzene	6.9
• Toluene	6.5
• Xylenes	63
• 1,4-dichlorobenzene	0.64
• Tetrachlorethylene	0.024
• Trichloroethylene	0.020

The default groundwater cleanup levels for this site are established in 18 AAC 75.345 Table C Groundwater Cleanup Levels.

Contaminant	MTG Site Cleanup Level (mg/L)
• Diesel Range Organics	1.5
• Benzene	0.005
• Ethylbenzene	0.7
• Toluene	1.0
• Xylenes	10

- 1,4-dichlorobenzene 0.075
- Tetrachlorethylene 0.005
- Trichloroethylene 0.005

### 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 1.

**Table 1 – Exposure Pathway Evaluation**

Pathway	Result	Explanation
Surface Soil Contact	De-minimis exposure	Remaining contaminant concentrations are below ADEC's direct contact cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Remaining contaminant concentrations are below ADEC's direct contact cleanup levels.
Inhalation – Outdoor Air	De-minimis exposure	The remaining soil contaminant concentrations are well below the inhalation levels except for xylenes which are considered de minimis in extent; at depth and covered with clean fill. The site is a paved commercial area. Therefore, the risk is considered insignificant.
Inhalation – Indoor Air (vapor intrusion)	De-minimis exposure	The remaining soil contaminant concentrations are well below the inhalation levels for xylenes which are considered de minimis in extent ; at depth and covered with clean fill. The site is a commercial area. Therefore risk via this pathway is considered insignificant.
Groundwater Ingestion	De-minimis exposure	Structures within a ¼ mile radius of the site are connected to city water. New wells are unlikely in this largely commercial area. Therefore, exposure via this pathway is considered insignificant.
Surface Water Ingestion	Pathway Incomplete	There are no surface water bodies within ¼ mile of the site; therefore, this pathway is considered incomplete.
Wild Foods Ingestion	Pathway Incomplete	Site is a paved commercial facility, and contaminants of concern do not have the potential to bioaccumulate in plants or animals.

Exposure to Ecological Receptors	Pathway Incomplete	There is no evidence of ecological impacts resulting from contamination associated with this site. Exposure routes are not present.
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Notes to Table 1: “De-minimis exposure” means that in ADEC’s judgment, receptors are unlikely to be affected by the minimal volume of remaining contamination. “Pathway incomplete” means that in ADEC’s judgment, contamination has no potential to contact receptors. “Exposure controlled” means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

### **ADEC Decision**

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Corrective Action Complete- ICs determination subject to the following.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore Williams Express, Inc. shall report to ADEC every five years to document land use; or report as soon as Williams Companies becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to [DEC.ICUnit@alaska.gov](mailto:DEC.ICUnit@alaska.gov).**
2. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder’s Office within 45 days that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document.
3. Decommissioning of all on-site groundwater monitoring wells and off-site groundwater wells installed for monitoring of the subject property must be conducted in accordance with an ADEC approved workplan by December 30, 2011.
4. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
5. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 78.600(h). A “site” [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure and Notice of Environmental Contamination)
6. Soil contamination may be remaining in the area of the former tank arrays, in particular underneath the onsite building. When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.

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

The ADEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. When the site meets the requirements for a Corrective Action Complete determination, then the Institutional Controls will be terminated.

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

There are no further requirements under the Compliance Order by Consent, other than maintenance of institutional controls for this site.

**Appeal**

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 - 18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

**Please sign and return Attachment A to ADEC within 30 days of receipt of this letter.** If you have questions about this closure decision, please contact the ADEC project manager, Keather McLoone at (907) 269-7526.

Approved By,

Linda Nuechterlein  
Environmental Program Manager

Recommended By,

Keather McLoone  
Environmental Specialist

Attachment A: Corrective Action Complete-ICs Agreement Signature Page  
Attachment B: Notice of Environmental Contamination

Cc: Dan McMahon, Shannon & Wilson  
Bruce Anthony, Holiday Companies

**Attachment A: Corrective Action Complete-ICs Agreement - Signature Page\***

Williams Express, Inc. agrees to the terms of this Corrective Action Complete with ICs determination as stated in this Closure Decision Document dated **July 20, 2011** for the Former Williams Express Store #5009; Hazard ID: 23847. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 18 AAC 78.276(f).

Rebecca M Brown

Signature of Authorized Representative, Title Williams Express, Inc.

DEPT. OF ENVIRONMENTAL  
CONSERVATION  
AUG 03 2011  
RECEIVED

Rebecca M Brown

Printed Name of Authorized Representative, Title Williams Express, Inc.

**Note to Responsible Person (RP):**

**After making a copy for your records, please return a signed copy of this form to the ADEC project manager, Keather McLoone at the address on this correspondence within 30 days of receipt of this letter.**

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ADEC File No.                    2100.26.024  
Hazard ID:                        23847  
ADEC Project Manager:        Keather McLoone

**For Internal Use Only**

**\*Attention ADEC Administration Staff:** Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

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**2011-037474-0**

Recording Dist: 301 - Anchorage  
8/11/2011 12:33 PM Pages: 1 of 4



## Notice of Environmental Contamination

**Recording District: Anchorage**

Pursuant to 18 AAC 78.280(d), Williams Express Inc., as the responsible party of the subject property, hereby provides public notice that the property located at 1209 Gambell Street, Anchorage, Alaska, has been subject to the release(s) of hazardous substances. The parcel is Lots 5 and 6, Block 18D, Third Addition to the Original Townsite of Anchorage Alaska.

This site has been subject to a discharge or release and subsequent cleanup and/or monitoring of oil and other hazardous substances, regulated under 18 AAC 78, as amended October 2006. This release and cleanup and/or monitoring is documented in the Alaska Department of Environmental Conservation (ADEC) contaminated sites database at [http://www.dec.state.ak.us/spar/csp/db\\_search.htm](http://www.dec.state.ak.us/spar/csp/db_search.htm) under Hazard ID number 23810.

ADEC reviewed and approved, subject to this and other institutional controls, the cleanup and/or monitoring as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless 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 78.090 - 276 corrective action rules, that site cleanup has been performed to the maximum extent practicable even though residual fuel-contaminated soil and groundwater exists on-site.

Attached is a site survey or diagram that shows the property boundaries, locations of existing structures, and the approximate location and extent of remaining soil and groundwater contamination.

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Corrective Action Complete- ICs determination subject to the following.

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current ICs may not be protective and ADEC may require additional remediation and/or ICs. Therefore Williams Express Inc. shall report to ADEC every five years to document land use, or report as soon as Williams Express Inc. becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local ADEC office or electronically to [DEC.ICUnit@alaska.gov](mailto:DEC.ICUnit@alaska.gov).**



Notice of Environmental Contamination  
Former Williams Express Store 5009

2. A Notice of Environmental Contamination (deed notice) shall be recorded in the State Recorder's Office that identifies the nature and extent of contamination at the property and any conditions that the owners and operators are subject to in accordance with this decision document.
3. Installation of groundwater wells will require approval from ADEC in accordance with 18 AAC 75.350(2).
4. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership. (See attached site figure and Notice of Environmental Contamination)
5. Soil contamination may be remaining in the area of the active tank array. When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

In the event that the remaining contaminated soil becomes accessible during activities such as tank removal, or other information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator are required under 18 AAC 78.220 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 78, Article 2.

In the future, if soil is removed from the site or groundwater is brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time. Pursuant to 18 AAC 78.274 (b), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to 18 AAC 78, Article 2.

This notice remains in effect until a written determination from ADEC is recorded that states that soil and groundwater at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and groundwater meets the cleanup levels in Table C in 18 AAC 75.345 and that off-site transportation of soil and groundwater is not a concern.



Notice of Environmental Contamination Former  
Williams Express Store 5009

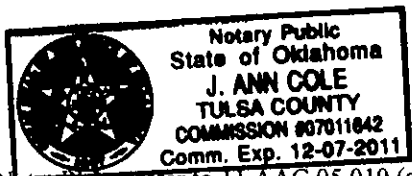
Please return original copy of this notice to the address below:

**Williams Express, Inc.:**

Signature: *Rebecca M Brown*

Printed Name: *Rebecca M Brown*  
Mailing Address: *One Williams Center, MD 48-6  
Tulsa, OK 74172*

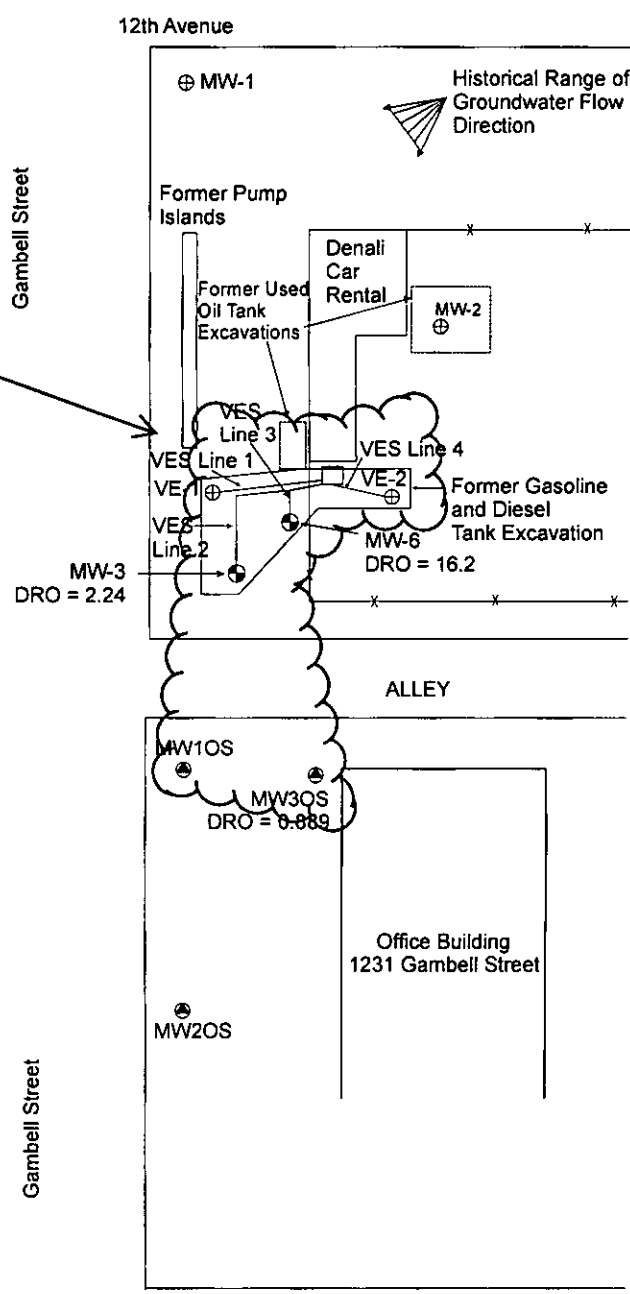
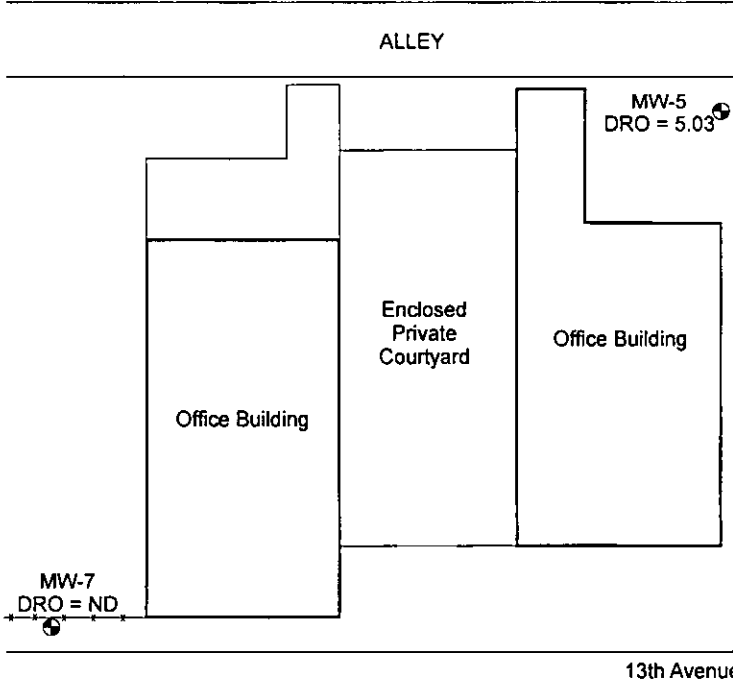
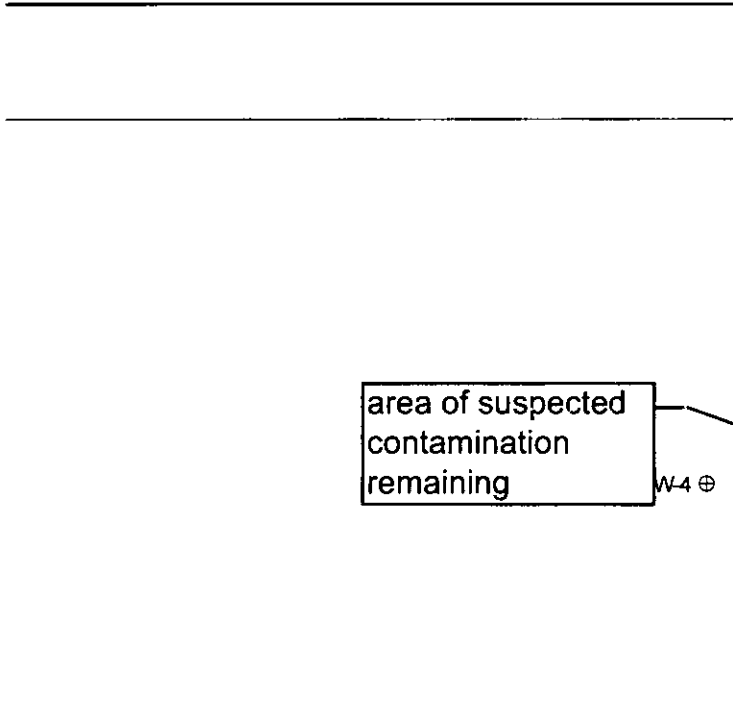
Subscribed and sworn to before me this 1<sup>st</sup> day of August, 2011.



Notary Public in and for the State of Oklahoma My  
commission expires: 12-07-2011

Note: Please refer to 11 AAC 05.010 (a)(14) for the required fee. The information requested on this form should be typed or legibly printed in English. Any attachments or exhibits must not exceed 8.5" x 14". This form is intended to comply with the recording requirements of AS 40.17.030 and 11 AAC 06.040, please double-check recording requirements.



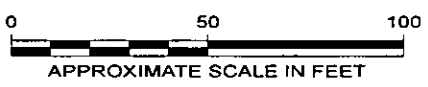


**LEGEND**

- MW-3 ⊕ Approximate location and number of Monitoring Well MW-3.
- MW-1 ⊕ Approximate location and number of Monitoring Well MW-1, decommissioned by Shannon & Wilson on December 18, 2009.
- DRO = 3.92 DRO concentrations (mg/L) in April 2010 sample
- ND Not detected; see Table 4 and Appendix C for reporting limits
- ⊕ Monitoring well installed by Shannon and Wilson in February 2007, under contract to third party
- MW1



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2011-037474-0



WES 5009, 1209 Gambell Street  
Anchorage, Alaska

**SITE PLAN**

February 2011 32-1-17311-096

**NOTE:**

**THE FOLLOWING  
DOCUMENT IMAGE IS  
AN ENHANCED COPY  
OF THE PREVIOUS  
DOCUMENT IMAGE.**

March 25, 2010

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**2011-037474-0**

Recording Dist: 301 - Anchorage  
8/11/2011 12:33 PM Pages: 1 of 4



## Notice of Environmental Contamination

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ADEC reviewed and approved, subject to this and other institutional controls, the cleanup and/or monitoring as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site unless 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 78.090 - 276 corrective action rules, that site cleanup has been performed to the maximum extent practicable even though residual fuel-contaminated soil and groundwater exists on-site.

Attached is a site survey or diagram that shows the property boundaries, locations of existing structures, and the approximate location and extent of remaining soil and groundwater contamination.

The ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Corrective Action Complete- ICs determination subject to the following.

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Notice of Environmental Contamination  
Former Williams Express Store 5009

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5. Soil contamination may be remaining in the area of the active tank array. When the soil becomes accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan
6. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

In the event that the remaining contaminated soil becomes accessible during activities such as tank removal, or other information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, the land owner and/or operator are required under 18 AAC 78.220 to notify ADEC and evaluate the environmental status of the contamination in accordance with applicable laws and regulations; further site characterizations and cleanup may be necessary under 18 AAC 78, Article 2.

In the future, if soil is removed from the site or groundwater is brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time. Pursuant to 18 AAC 78.274 (b), DEC approval is required prior to moving soil or groundwater that is, or has been, subject to 18 AAC 78, Article 2.

This notice remains in effect until a written determination from ADEC is recorded that states that soil and groundwater at the site has been shown to meet the most stringent soil cleanup levels in method two of 18 AAC 75.340 and groundwater meets the cleanup levels in Table C in 18 AAC 75.345 and that off-site transportation of soil and groundwater is not a concern.



Notice of Environmental Contamination Former  
Williams Express Store 5009

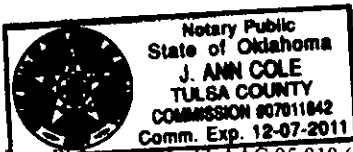
Please return original copy of this notice to the address below:

**Williams Express, Inc.:**

Signature: *Rebecca M Brown*

Printed Name: *Rebecca M Brown*  
Mailing Address: *One Williams Center, MD 48-6  
Tulsa, OK 74172*

Subscribed and sworn to before me this 1<sup>st</sup> day of August, 2011.

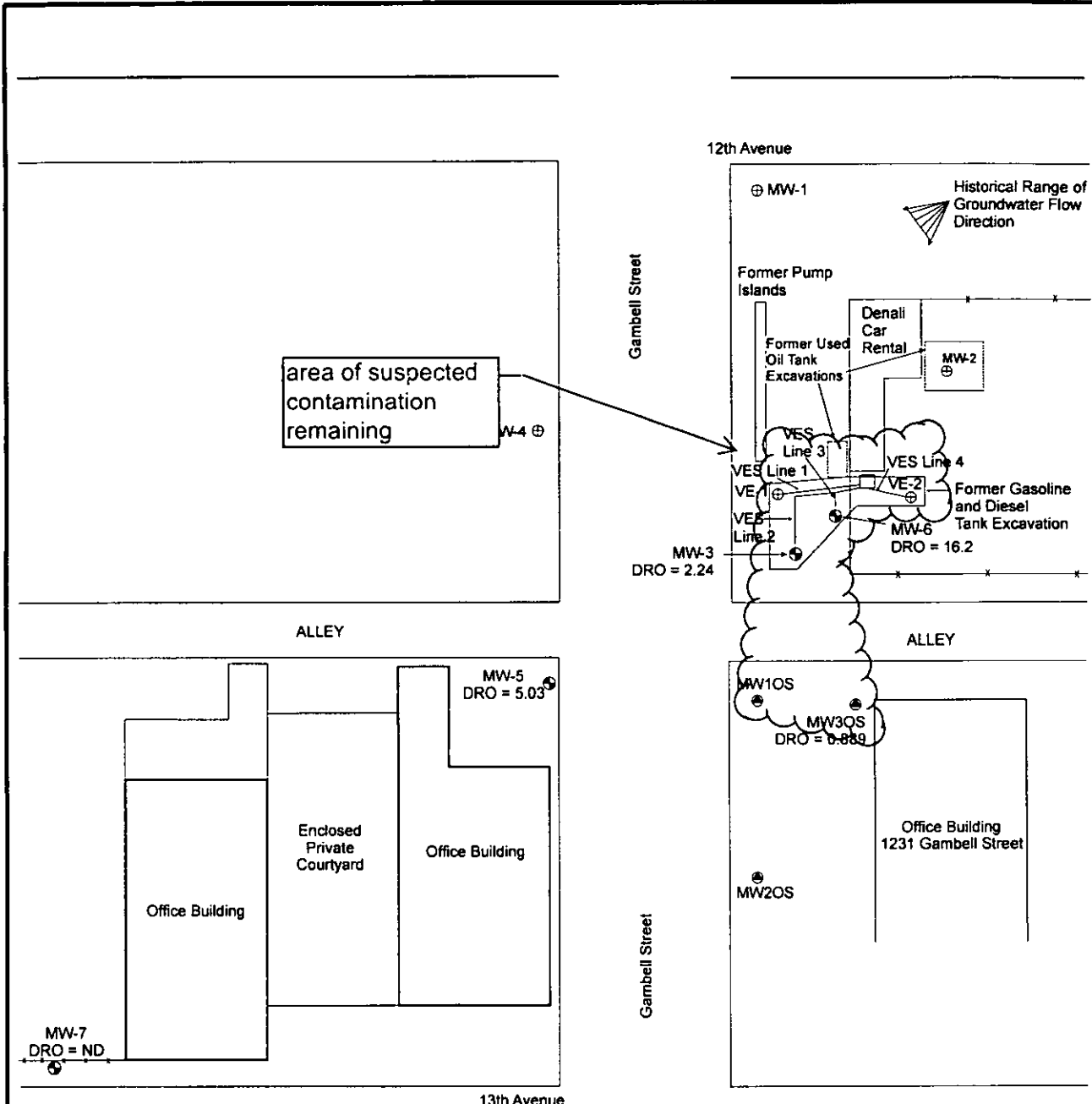


Notary Public in and for the State of Oklahoma. My  
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2011-037474-0



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**SITE PLAN**

February 2011 32-1-17311-096