



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Site Program

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File: 2268.26.008

December 9, 2019

Anastasia E. Duarte
Speedway, LLC.
3450 S 344th Way, Suite 135
Auburn, WA 98001-5931

Re: Decision Document: Tesoro Northstore #78 Vehicle Fueling Overfill
Cleanup Complete Determination

Dear Ms. Duarte:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Tesoro Northstore #78 Vehicle Fueling Overfill located at Mile 99 Parks Highway, Talkeetna, 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 unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Tesoro Northstore #78 Vehicle Fueling Overfill, which is located in the ADEC office in Soldotna, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

Tesoro Northstore #78 Vehicle Fueling Overfill
Mile 99 Parks Highway
Talkeetna, Alaska 99676

Name and Mailing Address of Contact Party:

Anastasia E. Duarte
Speedway, LLC.
3450 S 344th Way, Suite 135
Auburn, WA 98001-5931

DEC Site Identifiers:

File No. 2268.26.008
Hazard ID.: 27116

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

A one gallon diesel spill occurred at the Tesoro 2 Go Mart #78 (located at Mile 98.8 Parks Highway, Sunshine, Alaska) on the night of June 15, 2019, during the fueling of a truck operated by Carlile. According

Tesoro Northstore #78 Vehicle Fueling Overfill

to the Tesoro store manager, the Carlile truck driver alerted store staff to the release from diesel fuel dispenser Number 13 on the north dispenser island.

Upon notification of the spill, the Tesoro store manager deployed absorbent pads to contain and clean-up the spill. The extent of the spill was exacerbated by rain that caused the diesel fuel to spread rapidly to the north along a designed storm water drainage, impacting the adjacent gravel apron. (See Figure 1).

On July 12, 2019, the consultant conducted the release investigation. The release investigation included field screening of representative soil samples during the excavation work and the collection of representative confirmation soil samples from the bottom of the excavations. The samples were field screened with a calibrated photoionization detector (PID) and analyzed by an ADEC-qualified laboratory for gasoline range organics (GRO), diesel range organics (DRO), polynuclear aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs).

Following the initial excavation of 10 cubic yards of contaminated soil, analytical results indicated that DRO contamination above ADEC soil cleanup levels (SCLs) remained and additional soil would need to be removed. On September 23, 2019, an additional 15 cubic yards of soil was excavated. All excavated soil from both July 12 and September 23 were transferred to Alaska Soil Recycling in Anchorage, Alaska, for thermal treatment. Based on the laboratory analytical tests results for the excavation bottom soil samples, a de minimis amount of DRO remains in one location immediately adjacent to the concrete slab at the fuel dispenser island.

Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil and analyzed for Gasoline Range Organics (GRO) by Alaska Test Method AK101, Diesel Range Organics (DRO) by AK102, Volatile Range Organics (VOC) by U.S. Environmental Protection Agency Method (EPA) 8260, and Polynuclear Aromatic Hydrocarbons (PAH) by EPA 8270 Selective Ion Monitoring (SIM). Based on these analyses, diesel range organics were detected above the applicable cleanup levels and are considered the Contaminant of Concern at this site:

Cleanup Levels

Diesel range organics were detected in soil above the migration to groundwater soil cleanup levels established in 18 AAC 75.341 (d), Table B2.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
DRO	250

mg/kg = milligrams per kilogram

mg/L = milligrams per liter

ug/L = micrograms per liter

Characterization and Cleanup Activities

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 2019. These activities are described below.

Surface soils were visibly stained extending from the edge of the asphalt pavement north towards the vegetation at the edge of the gravel pad, approximately 4 feet by 30 feet. Soil samples were screened in the

field with a photo ionization detector (PID), as well as by olfactory for the presence of diesel odor. PID results from across the surface stain ranged from 28.5 to 476 parts per million (ppm), along with a distinct diesel fuel odor, confirmed the extent of the diesel release.

The initial field screening assessment of the surface stain on the gravel apron, combined with estimated 1 gallon of diesel released, and excavation to a depth of approximately 6 inches (0.5 feet), resulted in approximately 10 cubic yards of impacted soil. Sample results indicated that the cleanup was not complete. A second soil removal effort was conducted on September 23, 2019 (Figure 1.)

Upon reaching an excavation depth where it appeared all impacted soil had been removed, determined by field observations and field screening results, representative confirmation soil samples were collected at the bottom of the excavation and/or at the base of the sidewalls for laboratory analyses (Figure 2)

On September 23, 2019, an additional 15 cubic yards of diesel fuel contaminated soil was excavated from the original area of soil removal. The soil was placed into a covered 15 cubic yard side-dumper trailers, along with the super sacks from the July excavation. The intent of this excavation was to expand vertically and horizontally around the remaining DRO contamination left after the excavation conducted on July 12, 2019 (Figure 1). PID field screening of exposed soil was conducted on a continuous basis at the bottom of the excavation and on sidewalls.

The final dimensions of the excavation were approximately 10 feet by 30 feet, down to a depth of 2 feet adjacent to the asphalt pavement and tapering to 1.5 feet to 1.0 foot in all other directions.

Six confirmation soil samples were collected at the lateral extents of the excavation at the bottom of the sidewalls (Figures 2), plus one duplicate sample for quality control (QC). Table 2 presents a summary of the confirmation soil samples collected on September 23, 2019, the duplicate sample, their depths, and field screening (PID readings) results for each location.

The highest concentration remaining in the excavation was from a sample location under the asphalt sidewall. The area could not be excavated without compromising the asphalt. The soil sample was at the cleanup level for DRO at 250 mg/Kg, and the duplicate sample was below the cleanup level. The result would indicate that de minimus soil contamination remains in the excavation area.

The excavation area was backfilled and soils transferred to Alaska Soil Recycling in Anchorage, Alaska.

Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations meet the human health cumulative risk criteria for residential land 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 or Pathway Incomplete. A summary of this pathway evaluation is included in Table 3.

Table 2 September 2019 PID Readings and Soil Analytical Results for BTEX, GRO, and DRO
 Samples collected on September 23, 2019

Sample Identification	Sample Depth (feet bgs)	PID (ppmv)	Benzene ¹ (mg/kg)	Toluene ¹ (mg/kg)	Ethylbenzene ¹ (mg/kg)	Xylenes ¹ (mg/kg)	GRO (mg/kg)	DRO (mg/kg)
AA1	1.5	0.0	U (0.022)	U (0.11)	U (0.029)	U (0.14)	U (3.6)	17
AA2	1.5	0.0	U (0.017)	U (0.83)	U (0.022)	U (0.11)	U (2.8)	11
BB1	2.0	1.2	U (0.019)	U (0.095)	U (0.025)	U (0.13)	U (3.2)	150
BB2	1.0	0.0	U (0.016)	U (0.08)	U (0.021)	U (0.11)	U (2.7)	16
CC1	1.0	0.0	U (0.014)	U (0.072)	U (0.019)	U (0.096)	U (2.4)	U (10)
CC2	1.0	0.0	U (0.019)	U (0.097)	U (0.026)	U (0.13)	U (3.2)	19
TNS 78 (duplicate of BB1)	2.0	1.2	U (0.019)	U (0.11)	U (0.028)	U (0.14)	U (3.6)	250
Trip Blank	NA	NA	U (0.03)	U (0.15)	U (0.04)	U (0.2)	NT	NT
SCLs	NA	NA	0.022	6.7	0.13	1.5	300	250

Key:

1 – Analyzed by U.S. Environmental Protection Agency Method 8260C.

AK – Alaska Test Method

bgs – below ground surface

BTEX – benzene, toluene, ethylbenzene, and xylenes

DRO – Diesel range organics, analyzed by AK102.

SCLs – Soil cleanup levels, Migration-to-Groundwater, per Alaska Department of Environmental Conservation 18 Alaska Administrative Code 75.345, Table B1 and B2 (under 40-inch zone), updated September 29, 2018.

GRO – Gasoline range organics, analyzed by AK101.

mg/kg – milligrams per kilogram

NA – not applicable

NT – not tested

PID – photoionization detector

ppmv – parts per million by volume

U – Undetected above practical quantitation limits shown in parentheses.

Bold indicates the concentration exceeds the SCL or, if not detected, the practical quantitation limit exceeds the SCL.

Table 3 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	Contamination is present in surface soil (0 to 2 feet bgs) at the cleanup level at one sample location.
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is at the most rigorous cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Soil concentrations are below residential target levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not impacted by the release.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site. Surface water was not impacted by contamination.
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	Site cleanup of this release eliminated exposure to ecological receptors.

Notes to Table 3: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be adversely 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

ADEC Decision

Soil contamination at the site has been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This site will receive a “Cleanup Complete” designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater from a site that is subject to the site cleanup rules or for which a written determination from the department has been made under 18 AAC 75.380(d)(1) that allows contamination to remain at the site above method two soil cleanup levels or groundwater cleanup levels listed in Table C requires DEC approval in accordance with 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.
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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 20 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.

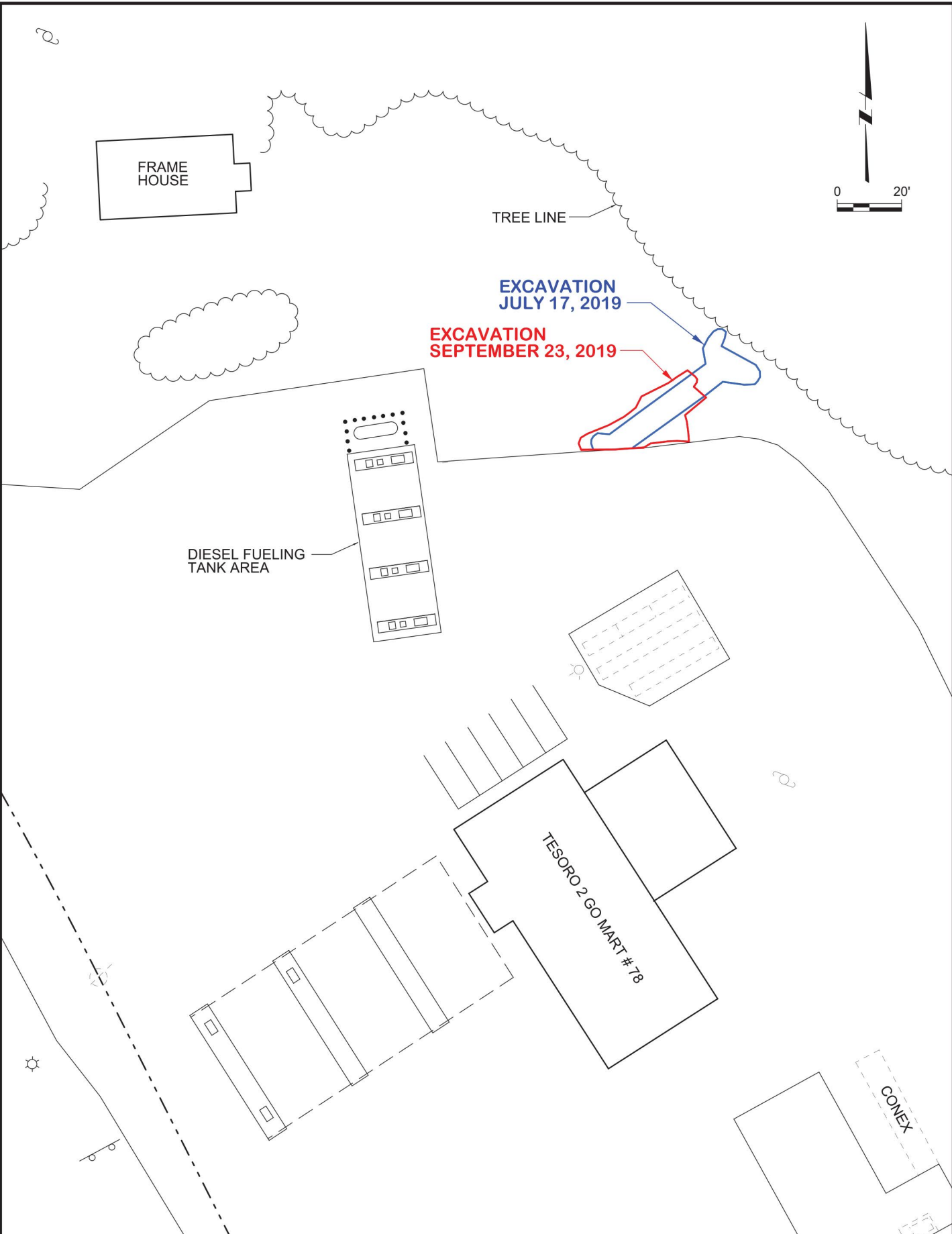
If you have questions about this closure decision, please feel free to contact me at (907) 262-3412, or email at peter.campbell@alaska.gov.

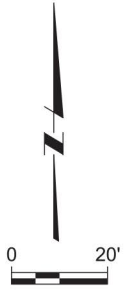
Sincerely,



Peter Campbell
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit





AA2	1.5' bgs
PID	0.0 ppmv
Benzene	U (0.017) mg/kg
Toluene	U (0.83) mg/kg
Ethylbenzene	U (0.022) mg/kg
Xylenes	U (0.11) mg/kg
GRO	U (2.8) mg/kg
DRO	11 mg/kg

AA1	1.5' bgs
PID	0.0 ppmv
Benzene	U (0.022) mg/kg
Toluene	U (0.11) mg/kg
Ethylbenzene	U (0.029) mg/kg
Xylenes	U (0.14) mg/kg
GRO	U (3.6) mg/kg
DRO	17 mg/kg

BB2	1.0' bgs
PID	0.0 ppmv
Benzene	U (0.016) mg/kg
Toluene	U (0.08) mg/kg
Ethylbenzene	U (0.021) mg/kg
Xylenes	U (0.11) mg/kg
GRO	U (2.7) mg/kg
DRO	16 mg/kg

CC2	1.0' bgs
PID	0.0 ppmv
Benzene	U (0.019) mg/kg
Toluene	U (0.097) mg/kg
Ethylbenzene	U (0.026) mg/kg
Xylenes	U (0.13) mg/kg
GRO	U (3.2) mg/kg
DRO	19 mg/kg

CC1	1.0' bgs
PID	0.0 ppmv
Benzene	U (0.014) mg/kg
Toluene	U (0.072) mg/kg
Ethylbenzene	U (0.019) mg/kg
Xylenes	U (0.096) mg/kg
GRO	U (2.4) mg/kg
DRO	U (10) mg/kg

BB1	2.0' bgs
PID	1.2 ppmv
Benzene	U (0.019) mg/kg
Toluene	U (0.95) mg/kg
Ethylbenzene	U (0.025) mg/kg
Xylenes	U (0.13) mg/kg
GRO	U (3.2) mg/kg
DRO	150 mg/kg

BB1 (Duplicate)	2.0' bgs
PID	1.2 ppmv
Benzene	U (0.019) mg/kg
Toluene	U (0.11) mg/kg
Ethylbenzene	U (0.028) mg/kg
Xylenes	U (0.14) mg/kg
GRO	U (3.6) mg/kg
DRO	250 mg/kg

**EXCAVATION
SEPTEMBER 23, 2019**

DIESEL FUELING
TANK AREA

TREE LINE

LEGEND:

- SOIL SAMPLE LOCATION
- bgs BELOW GROUND SURFACE
- DRO DIESEL RANGE ORGANICS
- GRO GASOLINE RANGE ORGANICS
- mg/kg MILLIGRAMS PER KILOGRAM
- ppmv PARTS PER MILLION BY VOLUME
- U UNDETECTED ABOVE PRACTICAL QUANTITATION LIMITS SHOWN IN PARENTHESES



TESORO COMPANY
TESORO 2 GO MART #78
JUNE 2019
RELEASE INVESTIGATION REPORT

EXCAVATION - SEPTEMBER 2019
WITH SAMPLE LOCATIONS AND
ANALYTICAL RESULTS