

December 3, 2021

Mr. Hal Hatfield
Holiday Alaska, LLC
1120 W. Warner Road
Tempe, Arizona 85284

RE: GROUNDWATER MONITORING WELL DECOMMISSIONING, HOLIDAY STATION STORE NO. 611, 1530 HUFFMAN ROAD, ANCHORAGE, ALASKA; ADEC FILE NO. 2100.26.623

Dear Mr. Hatfield:

This letter report presents the decommissioning of three groundwater monitoring wells at Holiday Station Store (HSS) No. 611, located at 1530 Huffman Road in Anchorage, Alaska. The project was conducted in general accordance with our November 5, 2021 *Work Plan for Groundwater Monitoring Well Decommissioning, Holiday Station Store No. 611, 1530 Huffman Road, Anchorage, Alaska* which was approved by Ms. Flannery Ballard of the Alaska Department of Environmental Conservation (ADEC) in the form of a letter dated November 19, 2021. A vicinity map and site plan are included as Figures 1 and 2, respectively.

BACKGROUND

On behalf of Holiday Alaska, LLC, Prism Design & Construction, LLC (Prism) conducted fuel dispenser upgrades at HSS. No. 611 in November 2018. Prism identified potential petroleum-impacted soil within two diesel dispenser excavations (Excavations 1 and 2) and one gasoline dispenser excavation (Excavation 3) during the upgrade activities. Soil samples collected by Shannon & Wilson from the limits of Excavations 1 and 2 contained concentrations of diesel range organics (DRO) exceeding the ADEC Method Two cleanup level. Soil samples collected from Excavation 3 did not contain target analytes greater than the ADEC cleanup levels. The excavations are shown on Figure 2.

To evaluate the dispenser releases, Shannon & Wilson conducted release investigation activities at the site in 2020, which consisted of advancing three borings (Borings B1, B2, and B3) and installing three groundwater monitoring wells (Wells MW1, MW2, and MW3). Contaminant concentrations exceeding the most stringent ADEC cleanup levels were not detected in the soil and groundwater samples collected during the release investigation activities. The groundwater monitoring wells are shown on Figure 2.

In an email dated December 3, 2020, Ms. Janice Wieggers of the ADEC, requested four quarterly groundwater sampling events, prior to evaluating the site for closure. Mr. Randy Guintu, of the ADEC, subsequently noted that it may be possible to re-evaluate the site for closure following two sampling events. Following receipt of the first two sampling events analytical sample results, Ms. Kara Kusche of the ADEC, was notified of the results in an email dated July 22, 2021. At this time, we recommended discontinuing quarterly groundwater monitoring and preparing a report requesting closure. In an email dated July 29, 2021, Ms. Kusche indicated that the ADEC would allow pausing quarterly sampling, pending receipt of our report, and would evaluate the site for potential closure.

In our October 8, 2021 *Revised Groundwater Monitoring Report, Holiday Station Store No. 611, 1530 Huffman Road, Anchorage, Alaska*, we recommended discontinuing quarterly groundwater sampling and granting closure to the site. In a letter dated November 2, 2021, Ms. Flannery Ballard of the ADEC noted that the site may be eligible for closure following the decommissioning of the groundwater monitoring wells onsite.

FIELD ACTIVITIES

Three groundwater monitoring wells, designated Wells MW1 through MW3, were decommissioned at the site on December 2, 2021. The monitoring wells were decommissioned in accordance with the ADEC's September 2013 *Monitoring Well Guidance* document. Photographs of the wells being decommissioned are included as Attachment 1.

Discovery Drilling (Discovery) provided the equipment and personnel to decommission the monitoring wells. At each well location, the well monument was removed from the ground. Next, Discovery lifted the well casings about 1 foot and separated the bottom well caps from the casings by driving a steel rod against the caps. The well casings and screens were lifted until the screened intervals were above the groundwater interface, allowing the aquifer material to collapse into the boreholes. Bentonite chips were placed in the casings and added as the casings were removed to keep the top of the bentonite chip columns within about 2 feet of the ground surface. For each well, the well casing broke during the removal and the well screen was left below ground surface. The top 2 feet of the boreholes were filled with pea gravel and the ground surface was repaired with asphalt patches. The well casings and monuments were taken offsite by Discovery and disposed as unregulated waste.

About Your Geotechnical/Environmental Report, to assist you and others in understanding the use and limitations of our reports.

You are advised that various state and federal agencies (ADEC, EPA, etc.) may require the reporting of this information. Shannon & Wilson does not assume the responsibility for reporting these findings and therefore has not, and will not, disclose the results of this study unless authorized by you or required by law.

We appreciate the opportunity to be of service. If you have questions or comments concerning this report, please call Dan P. McMahon or the undersigned at (907) 561-2120.

Sincerely,

SHANNON & WILSON

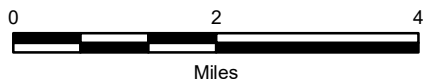


Alec Rizzo
Environmental Staff

Encl: Figures 1 and 2; and Attachments 1 and 2



Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



1530 Huffman Road
Anchorage, Alaska

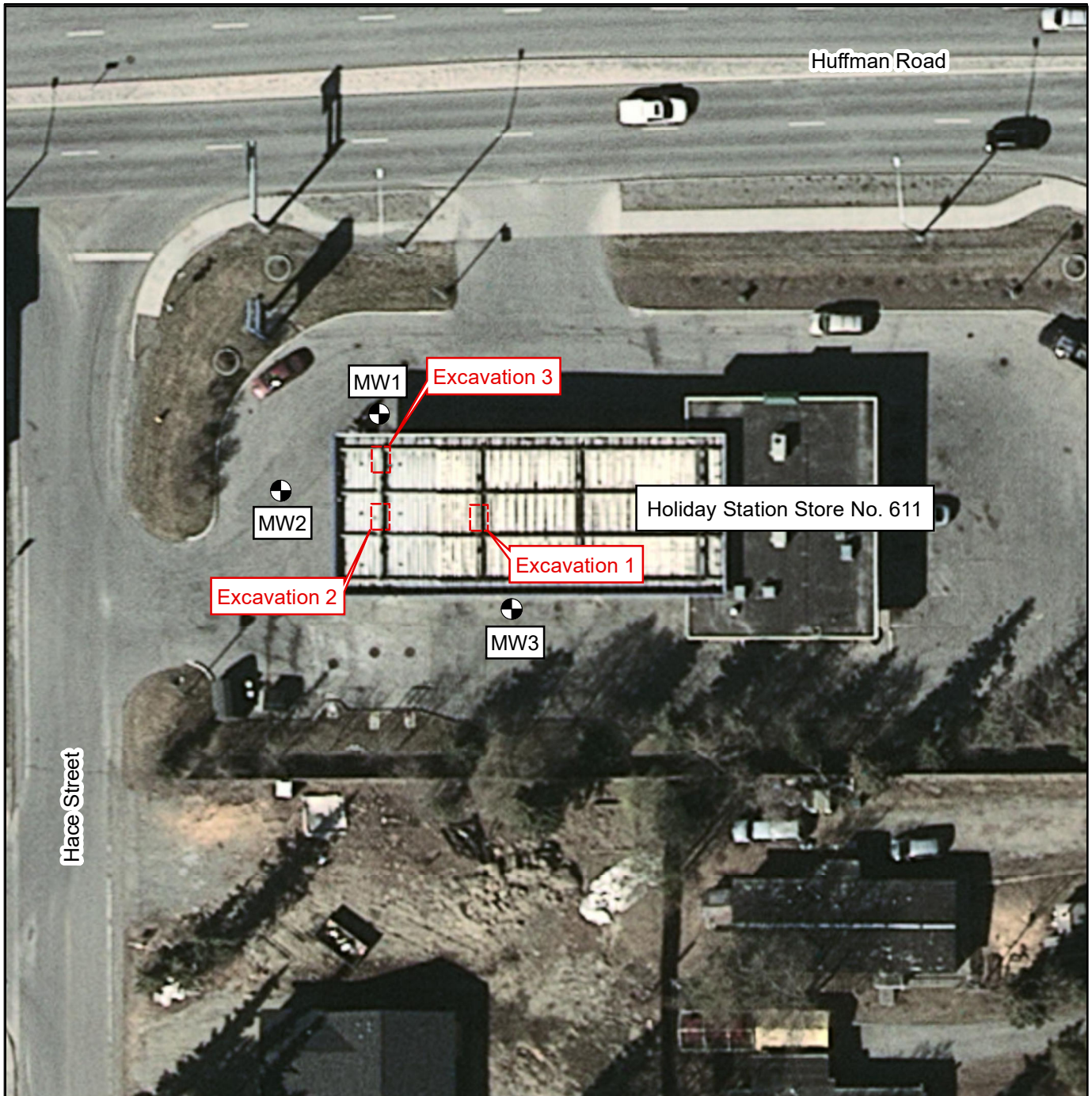
VICINITY MAP

December 2021

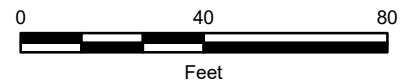
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

FIG. 1



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Legend

-  Approximate Location of Monitoring Well
-  MW1 decommissioned on December 2, 2021
-  Approximate Location of the 2018 Dispenser Excavation



1530 Huffman Road
Anchorage, Alaska

SITE PLAN

December 2021

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FIG. 2

Attachment 1

SITE PHOTOGRAPHS



Photo 1: Looking north,
decommissioning Monitoring
Well MW2. (December 2, 2021)



Photo 2: Looking south,
decommissioning Monitoring Well
MW1. (December 2, 2021)

1530 Huffman Road
Anchorage, Alaska

PHOTOS 1 AND 2

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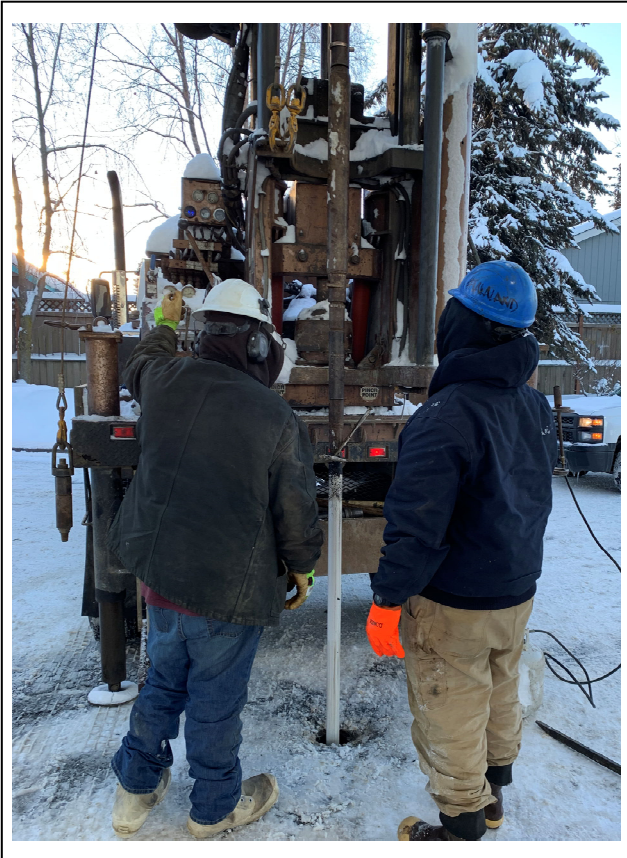


Photo 3: Looking south,
decommissioning Monitoring
Well MW3. (December 2, 2021)



Photo 4: Looking north, former
location of Monitoring Well MW2.
(December 2, 2021)

1530 Huffman Road
Anchorage, Alaska

PHOTOS 3 AND 4

December 2021

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Attachment 2

IMPORTANT INFORMATION ABOUT YOUR
GEOTECHNICAL/ENVIRONMENTAL REPORT



Date: December 2021

To: Holiday Alaska, LLC

IMPORTANT INFORMATION ABOUT YOUR GEOTECHNICAL/ENVIRONMENTAL PROPOSAL

More construction problems are caused by site subsurface conditions than any other factor. The following suggestions and observations are offered to help you manage your risks.

HAVE REALISTIC EXPECTATIONS.

If you have never before dealt with geotechnical or environmental issues, you should recognize that site exploration identifies actual subsurface conditions at those points where samples are taken, at the time they are taken. The data derived are extrapolated by the consultant, who then applies judgment to render an opinion about overall subsurface conditions; their reaction to construction activity; appropriate design of foundations, slopes, impoundments, recovery wells; and other construction and/or remediation elements. Even under optimal circumstances, actual conditions may differ from those inferred to exist, because no consultant, no matter how qualified, and no subsurface program, no matter how comprehensive, can reveal what is hidden by earth, rock, and time.

DEVELOP THE SUBSURFACE EXPLORATION PLAN WITH CARE.

The nature of subsurface explorations—the types, quantities, and locations of procedures used—in large measure determines the effectiveness of the geotechnical/environmental report and the design based upon it. The more comprehensive a subsurface exploration and testing program, the more information it provides to the consultant, helping to reduce the risk of unanticipated conditions and the attendant risk of costly delays and disputes. Even the cost of subsurface construction may be lowered.

Developing a proper subsurface exploration plan is a basic element of geotechnical/environmental design, which should be accomplished jointly by the consultant and the client (or designated professional representatives). This helps the parties involved recognize mutual concerns and makes the client aware of the technical options available. Clients who develop a subsurface exploration plan without the involvement and concurrence of a consultant may be required to assume responsibility and liability for the plan's adequacy.

READ GENERAL CONDITIONS CAREFULLY.

Most consultants include standard general contract conditions in their proposals. One of the general conditions most commonly employed is to limit the consulting firm's liability. Known as a "risk allocation" or "limitation of liability," this approach helps prevent problems at the beginning and establishes a fair and reasonable framework for handling them, should they arise.

Various other elements of general conditions delineate your consultant's responsibilities. These are used to help eliminate confusion and misunderstandings, thereby helping all parties recognize who is responsible for different tasks. In all cases, read your consultant's general conditions carefully and ask any questions you may have.

HAVE YOUR CONSULTANT WORK WITH OTHER DESIGN PROFESSIONALS.

Costly problems can occur when other design professionals develop their plans based on misinterpretations of a consultant's report. To help avoid misinterpretations, retain your consultant to work with other project design professionals who are affected by the geotechnical/environmental report. This allows a consultant to explain report implications to design professionals affected by them, and to review their plans and specifications so that issues can be dealt with adequately. Although some other design professionals may be familiar with geotechnical/environmental concerns, none knows as much about them as a competent consultant.

OBTAIN CONSTRUCTION MONITORING SERVICES.

Most experienced clients also retain their consultant to serve during the construction phase of their projects. Involvement during the construction phase is particularly important because this permits the consultant to be on hand quickly to evaluate unanticipated conditions, to conduct additional tests if required, and when necessary, to recommend alternative solutions to problems. The consultant can also monitor the geotechnical/environmental work performed by contractors. It is essential to recognize that the construction recommendations included in a report are preliminary, because they must be based on the assumption that conditions revealed through selective exploratory sampling are indicative of actual conditions throughout a site.

Because actual subsurface conditions can be discerned only during earthwork and/or drilling, design consultants need to observe those conditions in order to provide their recommendations. Only the consultant who prepares the report is fully familiar with the background information needed to determine whether or not the report's recommendations are valid. The consultant submitting the report cannot assume responsibility or liability for the adequacy of preliminary recommendations if another party is retained to observe construction.

REALIZE THAT ENVIRONMENTAL ISSUES MAY NOT HAVE BEEN ADDRESSED.

If you have requested only a geotechnical engineering proposal, it will not include services needed to evaluate the likelihood of contamination by hazardous materials or other pollutants. Given the liabilities involved, it is prudent practice to always have a site reviewed from an environmental viewpoint. A consultant cannot be responsible for failing to detect contaminants when the services needed to perform that function are not being provided.

ONE OF THE OBLIGATIONS OF YOUR CONSULTANT IS TO PROTECT THE SAFETY, PROPERTY, AND WELFARE OF THE PUBLIC.

A geotechnical/environmental investigation will sometimes disclose the existence of conditions that may endanger the safety, health, property, or welfare of the public. Your consultant may be obligated under rules of professional conduct, or statutory or common law, to notify you and others of these conditions.

RELY ON YOUR CONSULTANT FOR ADDITIONAL ASSISTANCE.

Your consulting firm is familiar with several techniques and approaches that can be used to help reduce risk exposure for all parties to a construction project, from design through construction. Ask your consultant, not only about geotechnical and environmental issues, but others as well, to learn about approaches that may be of genuine benefit.

The preceding paragraphs are based on information provided by the
ASFE/Association of Engineering Firms Practicing in the Geosciences, Silver Spring, Maryland