



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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ADEC File No: 2100.26.623

March 7, 2024

Mr. Anthony Bell  
Holiday Alaska, LLC  
1100 Situs Court, Suite 100  
Raleigh, NC 27606

Re: Decision Document: Holiday Station Store #611 Dispensers  
Cleanup Complete Determination

Dear Mr. Bell:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program (CSP) has completed a review of the environmental records associated with the Holiday Station Store #611 Dispensers located at 1530 Huffman Road 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 unless information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Holiday Station Store #611 Dispensers maintained by ADEC. This decision letter summarizes the site history, cleanup actions and levels, and site closure conditions that apply.

**Site Name and Location:**

Holiday Station Store #611 Dispensers  
1530 Huffman Road  
Anchorage, AK 99515

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

Mr. Anthony Bell  
Circle K Stores Inc.  
1100 Situs Court, Suite 100  
Raleigh, NC 27606

**ADEC Site Identifiers:**

File No.: 2100.26.623  
Hazard ID.: 27225

**Regulatory Authority for Determination:**

18 Alaska Administrative Code (AAC) 75 and 18 AAC 78

### Site Description and Background

This site, located at 1530 Huffman Road in Anchorage, Alaska, and is an active fuel station operated by Holiday Alaska, LLC. The site is at Lot 1A, Block 2, Beacon Park Subdivision. The property has three active underground storage tanks (UST), installed in 1998, centrally located on the property. Tank #4 is a 10,000-gallon tank containing gasoline; tank #5 is a 10,000-gallon tank containing gasoline; and tank #6 is a 15,000-gallon tank containing gasoline. During a fuel system upgrade in November 2018, petroleum impacted soil was identified within two diesel dispenser excavations and one gasoline dispenser excavation.

The Holiday Station Store #611 Dispensers is adjacent to another site that is on the same legal property resulting from releases from the tanks' fill containment. The adjacent site is the Holiday Station Store #611 (ADEC file number: 2100.26.557 and Hazard ID: 25217) and was closed in 2010 with Institutional Controls. A Notice of Environmental Contamination (NEC) was filed on the property in 2010.

Petroleum impacted soil discovered during the November 2018 upgrades was determined to be a new release, not remnant contamination remaining on the property from the previously closed contaminated site.

### Contaminants of Concern

During site investigation and cleanup activities, samples were collected from soil and groundwater and analyzed for gasoline range organics (GRO) by Alaska Method (AK) 101, diesel range organics (DRO) by AK 102, benzene, ethylbenzene, toluene, and xylenes (BTEX) by Environmental Protection Agency (EPA) Method 8021B, volatile organic compounds (VOCs) by Method 8260C, polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270D selective ion method (SIM), and total lead by EPA Method 6020A. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern (COCs) at this site:

- Diesel Range Organics (DRO)

### Cleanup Levels

Soil cleanup levels applicable to the site are the most stringent Method 2 cleanup levels for the under 40-inches of precipitation climate zone found in 18 AAC 75.341(c), Table B1 and 18 AAC 75.341(d), Table B2. Groundwater cleanup levels applicable to this site are found in 18 AAC 75.345, Table C.

**Table 1 – Approved Cleanup Levels**

Contaminant	Soil (mg/kg)	Groundwater (µg/L)
DRO	250	1,500

Notes:

1. mg/kg = milligrams per kilogram
2. µg/L = micrograms per liter

### Characterization and Cleanup Activities

In November 2018, petroleum-impacted soil was identified within two diesel dispenser excavations (Excavations 1 and 2) and one gasoline dispenser excavation (Excavation 3) during system upgrade activities (see attached figure). Approximately 15 cubic yards of impacted soil was removed from the three excavations and temporarily stockpiled on-site. Further excavation of the dispensers was impeded by infrastructure of the active gas station. Field screenings and soil samples were collected from the final dispenser excavations and stockpiled soil. All soil samples were analyzed for GRO, DRO, VOCs, PAHS, and total lead.

The soil confirmation sample collected from diesel dispenser Excavation 1 contained DRO at 2,960 milligram per kilogram (mg/kg). The soil confirmation sample from diesel dispenser Excavation 2 contained DRO at

1,000 mg/kg. All other analytes were below the most stringent cleanup levels. A confirmation sample collected beneath the gasoline dispenser Excavation 3 did not have any exceedances of cleanup levels. Stockpile soil samples contained concentrations of total lead (maximum 6.92 mg/kg), below the ADEC cleanup level of 400 mg/kg. One soil sample was also analyzed for ethylene dibromide (EDB) but was not detected. The remaining target analytes in the excavation samples or stockpile were either not detected or detected at concentrations less than the applicable ADEC cleanup levels. The stockpile, 49.76 tons of soil, was transported to Alaska Soil Recycle (ASR) for disposal.

In July 2020, a Release Investigation was conducted to further evaluate the releases from the diesel dispensers. Field activities included advancing three soil borings, installing three groundwater monitoring wells, collecting soil and groundwater samples, conducting a level-loop survey, and management of investigation derived waste (IDW). Soil samples were analyzed for GRO, DRO, BTEX, and a subset were additionally sampled for a full suite of VOCs and PAHs. Groundwater samples were analyzed for GRO, DRO, VOCs, and PAHs. Analytical results showed soil samples contained GRO, DRO, toluene, xylenes, tetrachloroethene (PCE), benzo(a)pyrene, benzo(g,h,i)perylene, and/or chrysene in at least one soil sample at concentrations less than the most stringent ADEC cleanup levels. Groundwater samples contained GRO, DRO, dichlorodifluoromethane, trichlorofluoromethane, and/or PCE in at least one sample, but at concentrations less than ADEC Table C cleanup levels. The remaining tested analytes were not detected in soil and groundwater samples. IDW, drill cuttings and purge water, were disposed at and/or treated by National Response Corporation (NRC).

In 2021, two more groundwater monitoring events were conducted. Monitoring wells MW1, MW2, and MW3 were sampled in March and June 2021. In March 2021, there were detections of dichlorodifluoromethane, PCE, and/or trichlorofluoromethane in at least one project sample, but at concentrations less than the ADEC Table C cleanup levels. In June 2021, there were detections of DRO, dichlorodifluoromethane, PCE, trichlorofluoromethane, 1-methylnaphthalene, naphthalene, and/or phenanthrene in at least one project sample at concentrations less than the ADEC Table C cleanup levels. The remaining tested analytes were not detected in both the March and June 2021. Groundwater elevation was measured between 13 and 15 feet below ground surface (bgs), and groundwater flow direction, based on static groundwater measurements and a level-loop survey, is to the north. Purge water IDW from both sampling events was approved to be discharged to an unpaved portion of the property on October 7, 2021.

In December 2021, groundwater monitoring wells MW1, MW2, and MW3, were decommissioned.

### Remaining Contamination

The maximum concentrations of contaminants remaining at the site are shown in Table 2. These concentrations are all below their respective approved cleanup levels. Sample locations referred to in Table 2 are shown in the attached site figure.

**Table 2 – Maximum Contaminant Concentrations Remaining in Soil**

Contaminant	Soil (mg/kg)	Sample Location	Date Sampled
DRO	2,960	EX1 (excavation 1)	11/28/2018

### 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 (HI) of 1 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, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 3.

**Table 3 – Exposure Pathway Evaluation**

Pathway	Result	Explanation
Surface Soil Contact	De Minimis Exposure	Contamination remaining in the surface soil is below Human Health (inclusive of direct contact) in 18 AAC 75.341, Tables B1 and B2.
Subsurface Soil Contact	De Minimis Exposure	Contamination remaining in the subsurface soil is below Human Health (inclusive of direct contact) in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Outdoor Air	De Minimis Exposure	Contamination remaining in the subsurface but is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De Minimis Exposure	Contamination remaining in groundwater is below vapor screening levels.
Groundwater Ingestion	De Minimis Exposure	Groundwater sample results show contaminant concentration below 18 AAC 75.345, Table C values.
Surface Water Ingestion	Pathway Incomplete	Surface water is more than 300 feet away and is not used for drinking water.
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	There are no terrestrial or aquatic exposure routes present.

Notes:

1. “De Minimis Exposure” means that, in ADEC’s judgment, the receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination.
2. “Pathway Incomplete” means that, in ADEC’s judgment, the contamination has no potential to contact receptors.

**ADEC Decision**

Soil and groundwater 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. ADEC approval is required for movement and disposal of soil and/or groundwater subject to the Site Cleanup Rules, in accordance with 18 AAC 78.600(h). Please contact ADEC for information about applicable regulations and requirements. A “site”, as defined by 18 AAC 78.995, means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

Movement or use of contaminated material in an ecologically sensitive area or in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. Furthermore, groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. If, in the future, groundwater from this site is to be used for other purposes, additional testing and treatment may be required to ensure the water is suitable for its intended use.

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 information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

**Informal Reviews and Adjudicatory Hearings**

A person authorized under a provision of 18 AAC 15 may request an informal review of a contested decision by the Division Director in accordance with 18 AAC 15.185 and/or an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340. See ADEC’s “Appeal a DEC Decision” web page <https://dec.alaska.gov/commish/review-guidance/> for access to the required forms and guidance on the appeal process. Please provide a courtesy copy of the adjudicatory hearing request in an electronic format to the parties required to be served under 18 AAC 15.200. Requests must be submitted no later than the deadline specified in 18 AAC 15.

If you have questions about this closure decision, please feel free to contact me at (907) 269-7556, or email at [alena.voigt@alaska.gov](mailto:alena.voigt@alaska.gov).

Sincerely,



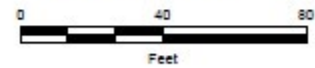
Alena Voigt  
Project Manager

Enclosed: Site Figure




cc: ADEC Cost Recovery Unit, via [dec.spar.cr@alaska.gov](mailto:dec.spar.cr@alaska.gov)  
Lisa Krebs-Barsis, ADEC, via [lisa.krebs-barsis@alaska.gov](mailto:lisa.krebs-barsis@alaska.gov)  
Dan McMahon, Shannon & Wilson, Inc., via [dan.mcmahon@shanwil.com](mailto:dan.mcmahon@shanwil.com)



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 installed by Shannon & Wilson  
on July 30, 2020
-  B1/MW1
-  Approximate Location of the 2018  
Dispenser Excavation

Note: Contaminant concentrations exceeding ADEC Method Two cleanup levels shown on figure.



1530 Huffman Road Anchorage, Alaska	
<b>SITE PLAN</b>	
October 2021	108609-001
 <b>SHANNON &amp; WILSON, INC.</b> INDUSTRIAL AND ENVIRONMENTAL CONSULTANTS	
<b>FIG. 2</b>	