

From: [Charlie Hampton](#)
To: [Wiegiers, Janice K \(DEC\)](#)
Cc: [Ryan Kingsbery](#)
Subject: RE: GTE / BJ Fuels
Date: Wednesday, March 13, 2024 1:50:14 PM
Attachments: [image001.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[GTE-BJ's Fuel Closure Report 3-13-24.pdf](#)

Hi Janice,

Attached is the updated closure report based on our conversation last week, thank you for your patience.

I updated the sections identified in your February 9 email below. I changed the report language to describe what Mr. Magnuson explained in the meeting, differentiating between the mobile quick connect present in the conduit underneath McGuire's Drive and the quick connect fixed to his tank. I also removed the pole barn from Figure M2 and expanded the scale of Zones 1 and 2 to a degree I believe is consistent with Mr. Magnuson's description of the site. Still, we did not have property boundaries surveyed and the lines are approximate.

Thank you!
Charlie



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From: Wiegiers, Janice K (DEC) <janice.wiegiers@alaska.gov>
Sent: Thursday, March 7, 2024 9:33 AM
To: Charlie Hampton <charlie@3tieralaska.com>
Subject: RE: GTE / BJ Fuels

Hi Charlie,

A call over teams would be useful so that we could use the screen sharing features to look over Figure

M2 and other site figures to help me understand what's known about the former site features. I am also unclear now on whether there was a quick connect associated with Mr. Magnuson's tank – the description in the report does not describe it.

1. Fuel was offloaded from airplanes by connecting a flexible hose to a quick connect located inside fuel-transport airplanes.
2. Fuel was pumped using a pump inside the airplane through the flexible hose to a rigid underground line.
3. Fuel flowed through the underground line beneath the McGrath Taxiway and McGuire Drive directly to the 2,500-gallon tank owned by Mr. Magnuson.
4. Fuel was dispensed from the tank owned by Mr. Magnuson using a fuel pump and nozzle east of the McGrath Roadhouse on a separate parcel. Fuel travelled through an underground line identified by AGI to the dispensing fuel pump.

If you are available today, I can be available today through 130 or after 3:00. Or we could plan a different time.

Janice

From: Wiegers, Janice K (DEC)
Sent: Friday, March 1, 2024 1:58 PM
To: Charlie Hampton <charlie@3tieralaska.com>
Subject: RE: GTE / BJ Fuels

Thanks Charlie,

I did not intend to suggest that Mr. Magnuson was directing you away from contamination, but that he was directing you toward where he remembers contamination being present (the former excavation area). He may not realize there were contaminated samples between the former garage building and the pole barn, near that former northern power pole.

Lets talk next week about this. Maybe we should try to talk to Mr. Magnuson together.

Janice

From: Charlie Hampton <charlie@3tieralaska.com>
Sent: Tuesday, February 27, 2024 3:01 PM
To: Wiegers, Janice K (DEC) <janice.wiegers@alaska.gov>
Cc: Ryan Kingsbery <rkingsbery@tpeci.com>
Subject: RE: GTE / BJ Fuels

Hi Janice,

Regarding the accuracy of the pole barn location in Figure M2, I do not believe the figure is accurate. As a reminder, I created this figure based on a verbal description of the pole barn in the field, recalled from a 25-year-old memory.

The east/west location of the pole barn is relatively accurate, but the northern extent of the pole barn is certainly not accurate. Based on the figure in the AGI report, we know that the pole barn did not extend all the way to the quick connect, but we do not know how far it extended. We excavated

approximately 10-20 feet from the edge of pavement (photo attached). The AGI report shows that the quick connect is directly on the property line. However, AGI did not survey the property to verify this location, and we do not know on what basis they established a property line. It appears the property line was based on the location of a power pole, which is no longer in place for me to use to reference the location in the AGI figure. We do not know where the property line is located relative to the existing edge of pavement, thus it is difficult to say with certainty where my excavation lay relative to the location identified by AGI as a quick connect. Based on this uncertainty and the location of my excavation within approximately 20 feet from the edge of pavement, it is possible that our "Zone 1" included or abutted the vicinity of the quick connect.

Regarding Mr. Magnuson's direction of the work, I do not believe he directed the excavation away from known contaminated soils. As a reminder, Mr. Magnuson directed me towards the location of the quick connect that he owned, directly fixed to the fuel tank in question – the AGI report was never referenced by either of us during the layout of Zone 1. This approach was detailed in Section 7.2 of the approved work plan. Based on the configuration determined by our previous exchange, the quick connect identified in the AGI report was not a component of his receiving/dispensing system. I agree that the excavation is more central to the property than we imagined; however, the north/south scale of the AGI figures appear exaggerated based on a failed understanding of the tank location and lack of aerial images for reference. Thus, the central location of Zones 1 and 2 do not necessarily exclude them from the area marked near the northern boundary of the property.

The details of this site are very difficult to explain clearly in writing. I am happy to meet at any time by Teams or over the phone to discuss the site layout.

Respectfully,
Charlie



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From: Wieggers, Janice K (DEC) <janice.wieggers@alaska.gov>

Sent: Tuesday, February 27, 2024 1:50 PM

To: Charlie Hampton <charlie@3tieralaska.com>

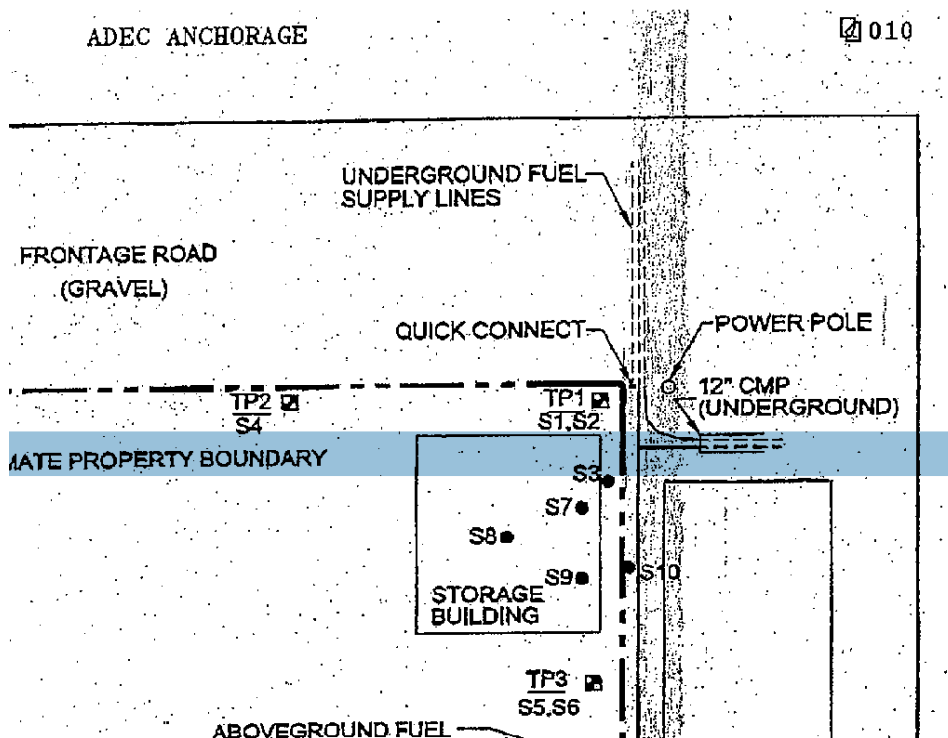
Subject: RE: GTE / BJ Fuels

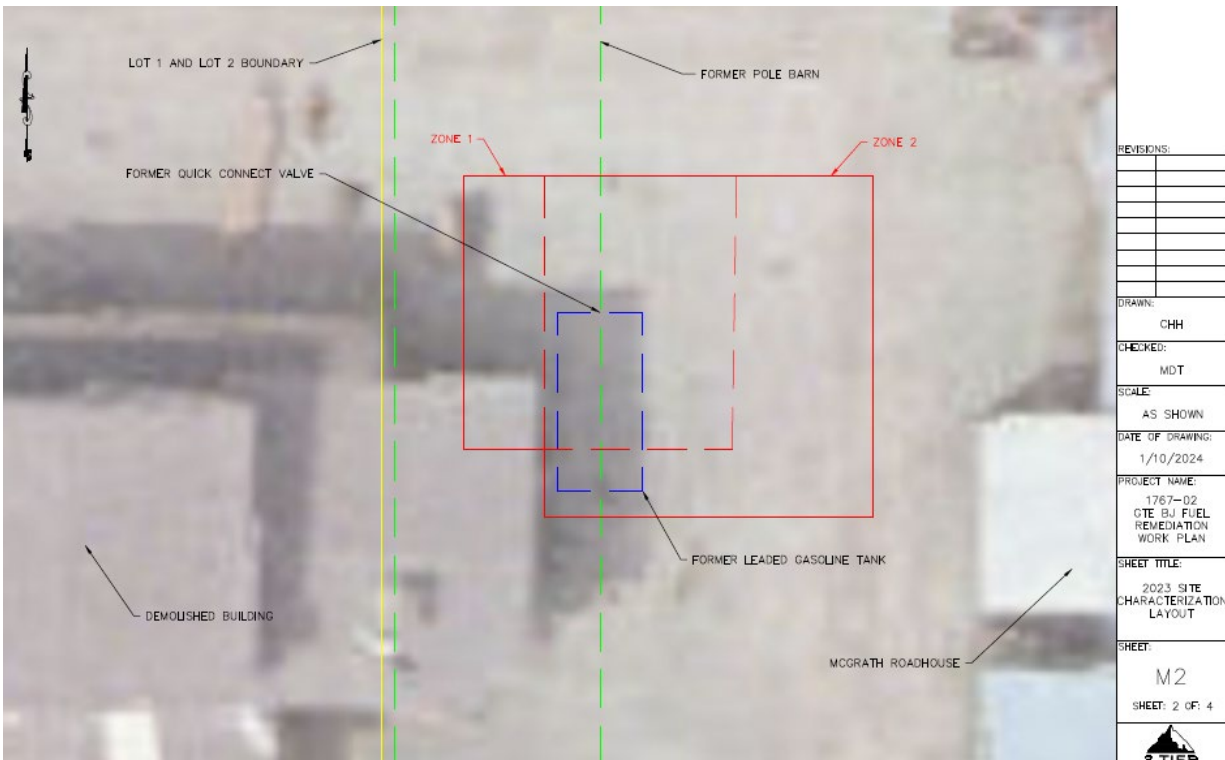
Hi Charlie,

I'm still finding some inconsistency with the available information that makes me question the sampling location. According to the text, maps, and photos in the 1999 and 2003 reports, Area 1 was in the area of that former power pole and the T or bend in the fuel supply lines from the runway where AGI observed something they described as a quick connect. Based on that information, I would expect Area 1, where contamination was found which was not excavated, to be north of and on the west side of the former pole barn location. Based on Figure M2 in your report, Mr. Magnuson appears to have directed the work to a more central location in Lot 2, underneath and toward the east side of the pole barn. I understand that lot lines are questionable in the older reports, but I would expect some accuracy with respect to the landmarks (pole barn location).

Does Figure M2 seem accurate with respect to the location of the pole barn and the quick connect observed by AGI? I'm including part of the figure from the 1999 AGI investigation, and Figure M2 from your recent report below.

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From: Charlie Hampton <charlie@3tieralaska.com>
Sent: Tuesday, February 13, 2024 12:33 PM
To: Wieggers, Janice K (DEC) <janice.wieggers@alaska.gov>
Cc: mtravis@tpeci.com; Ryan Kingsbery <rkingsbery@tpeci.com>
Subject: RE: GTE / BJ Fuels

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Hi Janice,

Attached is the updated work plan. I updated the sections you indicated. A description of the previous tank offloading configuration and procedure is provided at the top of page 4.

Basically, the configuration that you and I speculated over the phone was correct. Offloading was conducted through a flexible hose and connected to a quick connect within the offloading plane. Fuel was then pumped from the 2,500-gallon tank underground to the pumps east of the McGrath roadhouse, which were typical gas-station type pumps. Our only incorrect assumption was that the tank fueled aircraft directly at the runway.

Mr. Magnuson also clarified that he used to own Lot 7, but sold to KSKO between 1981 and 1982, and never used the lot to store a tank.

Please reach out with any questions.

Thank you,
Charlie



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From: Wieggers, Janice K (DEC) <janice.wieggers@alaska.gov>

Sent: Friday, February 9, 2024 11:07 AM

To: Charlie Hampton <charlie@3tieralaska.com>

Cc: mtravis@tpeci.com; Ryan Kingsbery <rkingsbery@tpeci.com>

Subject: GTE / BJ Fuels

Hello Charlie,

Here are my final comments for the cleanup report. Please revise the report to clarify these items.

- Page 2, third paragraph – somewhere in the report, please describe how the 2,500 gallon tank was filled and how fuel was dispensed from it to improve our understanding of how the quick connect was used and how and where spills may have occurred.
- Page 3, table 1, row 2 and page 4, section 3.2 - the R&M Phase I report appeared to be for the purchase of the BJ Fuels operations – which was primarily focused on a tank farm located on Mespelt Avenue. The spills described by R&M were not associated with the GTE/BJ Fuels subject property. Please clarify.
- Page 4, section 3.1, last sentence – please clarify that some of this statement does not appear to have been factual – for example “...in the southeast corner of Lot 2 nearest an aboveground gasoline tank, *believed* to be owned by BJ Fuel in Lot 7”. If there is doubt that BJs Fuel owned Lot 7 – make that clear as well.
- Page 5, first paragraph under bullets – Please clarify that more than one sample exceeded the cleanup levels. Ultimately, the most stringent soil cleanup level (usually the migration to groundwater level) applies at the site.

Thank you for your efforts to improve our understanding of this situation. I will work on completing a closure letter based on your report and the information we have discussed.

Janice Wieggers

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