



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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DEC File No: 2100.26.219

June 28, 2024

Craig Floyd
Floyd & Sons Inc.
3730 Spenard Rd
Anchorage, AK 99503

Re: Decision Document: Thrifty Rent a Car, 4000 gallon gasoline UST 2
Cleanup Complete Determination

Dear Mr. Floyd:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental records associated with the Thrifty Rent a Car, 4000 gallon gasoline UST 2 located at 3730 Spenard Road in Anchorage. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site from the 4,000 gallon underground storage tank (UST) fuel spills 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 Thrifty Rent a Car, 4000 gallon gasoline UST 2 maintained by DEC. This decision letter summarizes the site history, cleanup actions and levels, and site closure conditions that apply.

Site Name and Location:

Thrifty Rent a Car, 4000 gallon gasoline UST 2
3730 Spenard Road
Anchorage, Alaska 99517

Name and Mailing Address of Contact Party:

Craig Floyd
Thrifty Car Rental
3730 Spenard Road
Anchorage, AK 99517

DEC Site Identifiers:

File No.: 2100.26.219
Hazard ID.: 24015

Regulatory Authority for Determination:

18 Alaska Administrative Code (AAC) 18 AAC 78

Site Description and Background

This site is located in Anchorage, Alaska and serves as a car rental facility. A 4,000-gallon gasoline underground storage (UST) tank (DEC Tank ID #2) was installed in 1984 and constructed of steel. The UST was located on the east of the property in a parking lot. The tank was used by Thrifty personnel for the storage of gasoline fuel. Fuel would be removed from Thrifty rental cars prior to their shipment to the lower 48. The long dimension of the tank was oriented in a north south direction. A fuel product line and checkvalve was located on the northside of the tank which connected to a dispenser southwest of the UST. A fill pipe was located on the southern end of the tank. Groundwater in the area is found from 10 to 15 feet below ground surface (bgs) and flows south southwest.

Contaminants of Concern

During the site investigation and cleanup activities at this source area, samples were collected from soil and groundwater and analyzed for volatile petroleum hydrocarbons (VPH), total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), gasoline range organics (GRO), diesel range organics (DRO), lead, and residual range organics (RRO). Based on these analyses and current approved analytical methods, the following contaminants were detected above the applicable cleanup levels and are considered. Chemicals of Concern (COCs) at this site:

- GRO
- Benzene
- Ethylbenzene
- Toluene
- Xylenes
- Naphthalene
- 1,2,4-Trimethylbenzene
- 1,3,5-Trimethylbenzene

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)
GRO	300	2,200
Benzene	0.022	4.6
Ethylbenzene	0.13	15
Toluene	6.7	1,100
Xylenes	1.5	190
Naphthalene	0.038	1.7
1,2,4-Trimethylbenzene	0.61	56
1,3,5-Trimethylbenzene	0.66	60

Notes:

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

Characterization and Cleanup Activities

In 1989, contaminated soil was observed near the UST and subsequently excavated. The excavated contaminated soil was reported to have been thermally treated. Shannon and Wilson Inc. performed a site

inspection to evaluate the small spill and the levels of COCs in the remaining soil. Shannon and Wilson Inc. collected soil and groundwater samples near the north end of the UST, which suggested a leak occurred from the UST checkvalve. The checkvalve was repaired and the excavaton backfilled with clean pea gravel.

In 1992, the UST, dispenser and associated piping were removed. A small amount of contaminated soil was documented near the groundwater table at the northend of the UST footprint. Western Environmental Consultants performed a site assessment; no leaks from the tank and piping were noted. Four soil samples were collected beneath the former UST and dispenser footprints based on the results of twelve field screening samples. Two of the samples were collected from the bottom of the tank excavation at roughly 10 feet bgs. The third soil sample was collected underneath the dispenser. The fourth sample was collected in the stockpiled overburden. The soil samples were analyzed for VPH, benzene, ethylbenzene, toluene, and total xylenes by EPA methods 8015 and 8020, respectively. COCs were detected above cleanup levels in only one soil sample collected beneath the former UST in the north side of the excavation at 10 feet bgs. In this soil sample, VPH, benzene, toluene, ethylbenzene, and xylenes were detected at levels of 940 mg/kg, 1.3 mg/kg, 53 mg/kg, 22 mg/kg, and 160 mg/kg, respectively. Overburden from the tank excavation was placed back into the excavation and compacted. A 6 mil plastic liner was then installed and new uncontaminated fill placed in the excavation on the top of the liner and compacted. The area was capped with asphalt.

In 1995, Enviros, Inc. sampled the groundwater monitoring wells on the Thrifty property to determine the orgin of contamination in groundwater. Freidman & Bruya, Inc. analyzed all the groundwater samples, and compared the results to give a fingerprint of the petroleum in each groundwater monitoring well. The Friedman & Bruya, Inc. analysis suggested that the fuel in the monitoring wells on the Thrifty and Chevron facilities was automotive gasoline, was less than 4 years old, and likely from the same fuel release. Enivros, Inc. reviewed all the data collected at that time and concluded the contaminants of concern detected in groundwater monitoring wells on the Thrifty property originated from the Chevron site. In 1998, a settlement was reached between Thrifty Car Rental and Chevron and the responsibility for the additional contamination was assumed by Chevron, in association with the contaminated site Chevron - #9014 (Hazard ID 23570; DEC File 2100.26.057).

Remaining Contamination

The maximum concentrations of contaminants remaining at the site are shown in Tables 2a. Groundwater contamination is believed to be due to contaminanty migration onto the Thirifty Car Rental facility from a Chevron service station located at 3608 Minnestoa Drive, Anchorage, Alaska.

Table 2a – Maximum Contaminant Concentrations Remaining in Soil¹

Contaminant	Soil (mg/kg)
VPH	940
Benzene	1.3
Toluene	53
Ethylbenzene	22
Xylenes ²	160

Notes:

¹ Soil sample collected at the north end of former UST at 10 feet bgs, on 8/21/1992.

² Xylenes concentrations exceeded the soil saturation concentration but not ingestion or inhalation values. Chevron has accepted responsibility for groundwater contamination.

Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), when detectable contamination remains onsite 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, DEC has determined that residual contaminant concentrations meet the cumulative risk criteria for human health.

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC'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 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet bgs).
Subsurface Soil Contact	De Minimis Exposure	Contamination remains in the subsurface below human health and ingestion levels in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination remains in the subsurface below human health and inhalation levels in 18 AAC 75.341, Tables B1 and B2.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Groundwater is not believed to be impacted from the 4,000 gallon UST spill. The de minimis contaminated soil remaining is located over 100 feet from the current building.
Groundwater Ingestion	Pathway Incomplete	Groundwater is not believed to be impacted from the former 4,000 gallon UST spill. Groundwater contamination is attributed to the Chevron spill located at 3608 Minnesota Drive, Anchorage, Alaska.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site.
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	Contamination does not reach Lake Hood where aquatic life could be affected, as documented by the groundwater sampling results.

Notes:

1. “De Minimis Exposure” means that, in DEC’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 DEC’s judgment, the contamination has no potential to contact receptors.
3. “Exposure Controlled” means there is an IC in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

DEC Decision

Soil contamination at the site is believed to be de minimis and not pose an unacceptable risk to human health and the environment. Groundwater contamination at the site is attributed to the Chevron service station located at 3608 Minnesota Drive, Anchorage, Alaska. This site will receive a “Cleanup Complete” designation on the Contaminated Sites Database.

DEC 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 DEC 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.

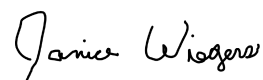
This determination is in accordance with 18 AAC 78.276(f) and does not preclude DEC from requiring additional assessment and/or cleanup action if information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

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 DEC’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) 451-2127, or email at janice.wiegers@alaska.gov

Sincerely,



Janice Wiegers
Environmental Program Manager

cc: DEC, Division of Spill Prevention and Response, Cost Recovery Unit

