



Stantec Consulting Services Inc.
725 East Fireweed Lane Suite 200, Anchorage AK 99503-2245

December 10, 2024

Stantec Project Number: 203723629

Mr. Eric Swaisgood
Marathon Petroleum Company, LP
539 South Main Street
Findlay, Ohio 45840

Reference: **Corrective Action Plan for 2024**
Former Tesoro North Store #101 and IFC
Marathon Petroleum Company (MPC) Site #157575
3569 South Cushman Street, Fairbanks, Alaska
ADEC Facility ID #2960; ADEC File #100.26.022

Dear Mr. Swaisgood:

This letter presents the 2025 (calendar year) Corrective Action Plan (CAP) for the monitoring and remediation of petroleum contamination at the above referenced site. The 2025 CAP was prepared by Stantec Consulting Services, Inc. (Stantec) on behalf of Tesoro Refining & Marketing Company (Tesoro) c/o Marathon Petroleum Company (MPC) for former Tesoro North Store #101 and Interior Fuel Company (IFC) that is currently owned by Crowley Petroleum Distribution, Inc. (Crowley).

Subject to your acceptance, this 2025 CAP will be presented at the annual work session with the Alaska Department of Environmental Conservation (ADEC), MPC and Stantec. The work session is scheduled for December 10, 2024, and will be presented by Stantec on behalf of MPC to Pete Campbell, ADEC representative, virtually via Microsoft Teams app.

Attached to this letter are the following items associated with the completion of the 2025 CAP tasks: Location and Vicinity Map, Site Plan with Analytical Results (September 2024 Annual GWM Event), and Analytical Data Results Tables of Historical Monitoring Events. The site plans, sampling test results, and additional site documents for the subject site will be included in a PowerPoint presentation that will be delivered by Stantec during the December 10 work session.

The following sections provide a summary of the work plan tasks that were completed under the current 2024 CAP followed by the proposed work plan tasks for the 2025 CAP.



Current 2024 CAP Work Plan Tasks

- ✓ Task 1 – Groundwater Monitoring
 - ✓ This task was completed in accordance with the approved 2024 CAP.
- ✓ Task 2 – O&M Remediation System
 - ✓ This task was completed in accordance with the approved 2024 CAP. Free product accumulation in CRW-2, WRW2020, MW19-1 and MW19-2 was monitored monthly and periodically removed with a peristaltic pump using a line attached to a water level meter to verify the free product presence above the water interface. The free product collected with the peristaltic pump from the above referenced wells is temporarily stored on-site in a 55-gallon drum that is contained in an over-pack drum (secondary containment). Approximately 6 gallons of free product was collected from the free product recovery wells (CRW-2, WRW2020, MW19-1 and MW19-2) during site visits completed in 2024.
- ✓ Task 3 – Install and operate a submersible pump in remediation well CRW on the IFC property (currently owned by Crowley).
 - ✓ This task was completed in accordance with the approved and reported to ADEC in a report dated December 2024 in a Technical Memorandum prepared by Stantec.

Proposed 2025 CAP Work Plan Tasks

The following table summarizes the proposed tasks and implementation schedule for the 2025 CAP:

2025 CAP Work Plan Tasks and Schedule

| Work Plan Task | | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter |
|----------------|--|-------------|-------------|----------------|-------------|
| Task 1 | Monitoring Wells: MW-3, MW-4, MW-8, MW-14, MW-17, MW19-1, MW19-2, CRW, ERW, OMW-3, OMW-4, and Aeration Treatment Tank (effluent discharged to the drainfield) | | | V, G, D, P & I | |
| Task 2 | O&M Free Product Recovery Systems in remediation wells CRW-2 and WRW2020. In addition, free product will be monitored and removed when found in MW19-1 and MW19-2. | ✓ | ✓ | ✓ | ✓ |

| | | | | | |
|--------|--|--|-------------------|-------------------|-------------------|
| Task 3 | Continue to operate a submersible pump in remediation well CRW and sample monthly during months when free of freezing condition. | | V, G, D, P & I | V, G, D, P & I | V, G, D, P & I |
|--------|--|--|-------------------|-------------------|-------------------|

Key:

AK – Alaska Test Method

D – Diesel range organics by AK102.

G – Gasoline range organics by AK101.

I – Intrinsic indicators consisting of dissolved oxygen, specific conductance, oxygen-reduction potential, pH, and temperature.

O&M – Operation and Maintenance

V – Volatile organic compounds by EPA Test Method 8260C.

P – Polynuclear aromatic hydrocarbons (PAHs), i.e., semi-volatile organic compounds, by EPA Test Method 8270D-SIM (Selective Ion Monitoring).

✓ *Task 1 – Groundwater Monitoring*

Annual monitoring of the groundwater wells and the free product recovery wells will be conducted. Sampling locations and analyses for the groundwater monitoring wells and free product recovery wells are listed on the 2025 Work Plan Schedule shown above.

✓ *Task 2 – O&M Remediation System*

Perform monthly maintenance on the free product recovery wells CRW-2 and WRW2020. The O&M work will include monthly maintenance on the free product recovery wells, the groundwater drawdown pump, the aeration blower, the iMonnit sensors, and the extraction of free product with a peristaltic pump as necessary.

The submersible drawdown pumps in wells CRW-2 and WRW2020 are operated on a continuous basis (24 hours per day). The drawdown water from both wells discharges to the on-site 1,500-gallon, 2 compartment aeration treatment tank that flows into the on-site drainfield Infiltrator® system for additional treatment.

The free product recovered from remediation wells CRW-2 and WRW2020 and groundwater monitoring wells MW19-1 and MW19-2 will be collected with a peristaltic pump and temporarily stored on-site in a double-walled drum. The volume of the stored free product will be measured and properly disposed of at an ADEC approved off-site treatment facility.

✓ *Task 3 – Continue to seasonally operate a submersible pump in remediation well CRW for discharge and treatment in the 1,500-gallon aeration treatment tank.*

The purpose of this task is to capture and treat fuel contaminated groundwater on the former IFC property (currently owned by Crowley) that was discovered during the 2023 annual groundwater monitoring event. This task consists of operating a 0.5 HP submersible pump in remediation well CRW – an 8" diameter remediation well located in northwest corner of Crowley property (former IFC). The pump will be seasonally operated and discharged on a continuous basis to the existing 1,500-gallon aeration treatment tank. The well will be sampled monthly when weather allows (non-freezing weather) for the analytes listed for Task 3 of the work plan above to determine if the concentration of dissolved contaminates is being degraded.



The Corrective Action Work Plan for the year 2025 will be implemented by Stantec on behalf of Tesoro c/o MPC. Groundwater monitoring will be conducted to track migration and trends of contaminants that are present at the site. Upon completion of each CAP task and receipt of applicable laboratory test results, if any, Stantec will prepare an annual report on the findings and submit the written report to ADEC for documentation purposes.

All sampling activities will be completed in accordance with ADEC's *Underground Storage Tanks Procedures Manual—Standard Sampling Procedures* (March 22, 2017). The methods that will be used for conducting a monitoring event, unless otherwise noted in the monitoring report, will include:

- The static water levels in the monitoring wells will be measured with respect to the top of each well casing. The elevation of the static water level will be based on an arbitrary datum established on-site during a vertical control survey that will be completed by Stantec on an annual basis. The survey will be performed during the summer after the seasonal frost layer thaws.
- The monitoring wells will be purged of a minimum of three well bore volumes prior to collecting the water samples. A new, disposable, PET bailer will be used to sample each well. The first bail of water removed from each well will be examined for petroleum odor, sheen, and any other unique physical features.
- Water samples will be collected in laboratory-supplied sample containers. The samples will be delivered to an ADEC-approved laboratory in accordance with standard chain-of-custody procedures.
- Additional water samples will be collected from the monitoring wells after the well has been purged, as described above, and tested in the field for chemical and physical intrinsic parameters listed in the 2025 Work Plan Schedule shown above.

If you have any questions or need additional information concerning this 2025 Corrective Action Work Plan, please contact us at (907) 248-8883.

Regards,

STANTEC CONSULTING SERVICES, INC.

A handwritten signature in black ink that appears to read "M. A. Zidek".

Michael A. Zidek, PMP
Project Manager

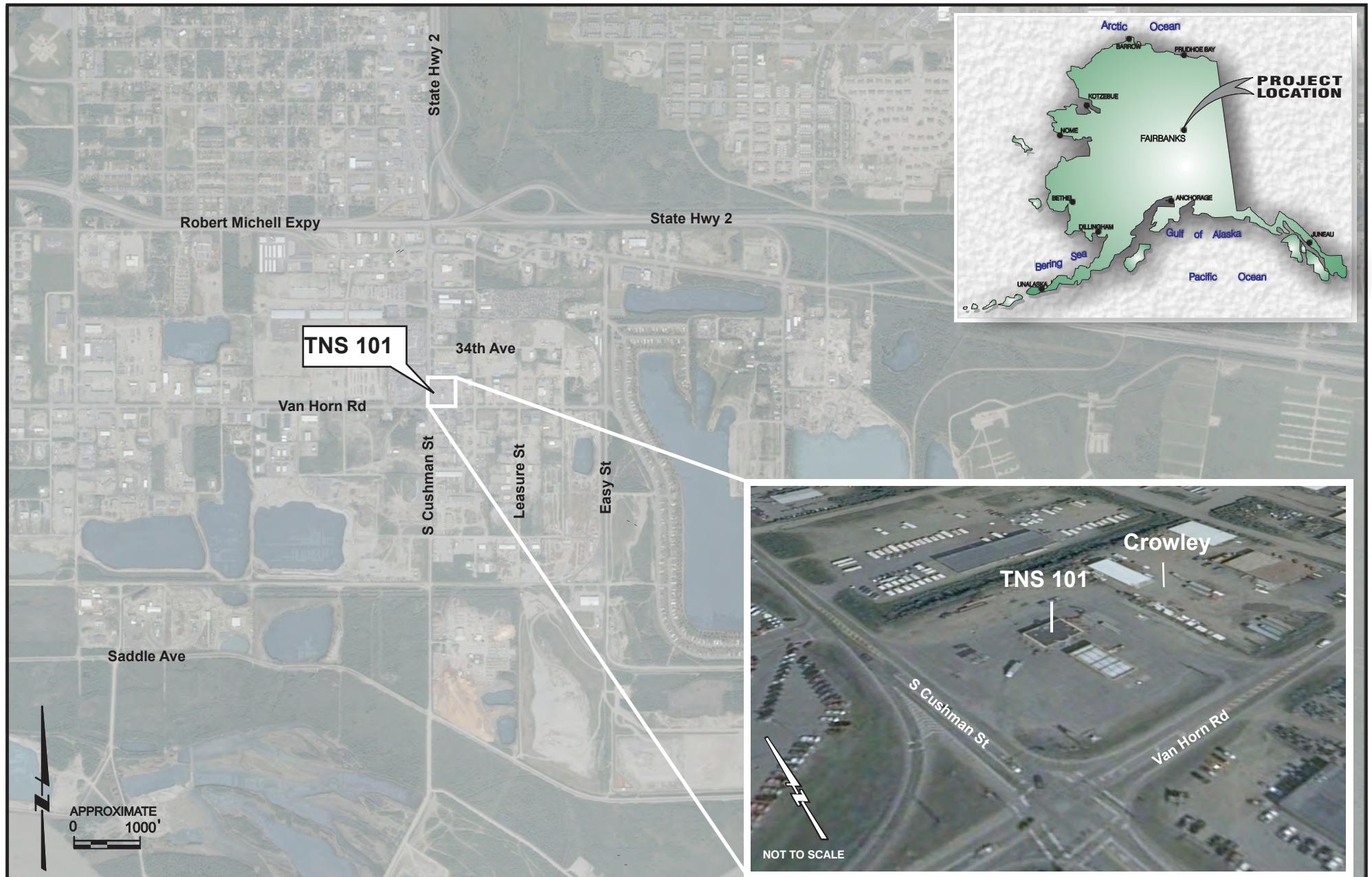
A handwritten signature in black ink that appears to read "Bob E. Gilfilian".

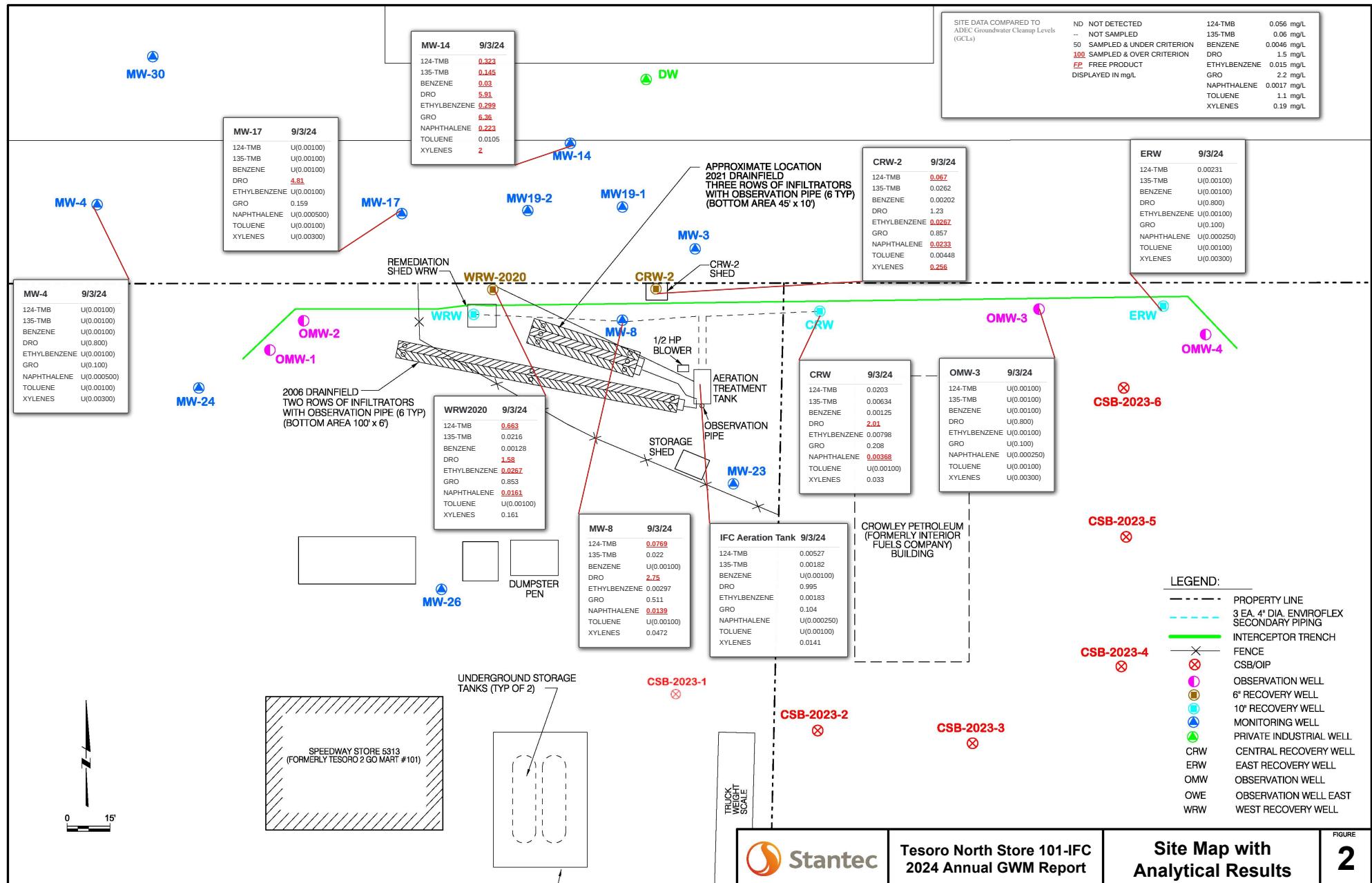
Bob Gilfilian, P.E.
Project Technical Lead

Attachments: Figure 1 – Location and Vicinity Map

Figure 2 – Site Plan with Analytical Data Results (September 2024 Annual GWM Event)

Figure 3 – Analytical Data Results Tables of Historical Monitoring Events





TNS #101 & IFC (MPC #157575) MPC - Eric
Swaisgood
3569 S Cushman St
Fairbanks, Alaska 99701

Data Table

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Data Table

| | Well Screen Interval | Ground Water Elevation | 124-TMB | 135-TMB | Benzene | DRO | Ethybenzene | GRO | Naphthalene | Sodium | Toluene | Xylenes |
|--------------------------------|----------------------|------------------------|----------------|-------------|---------------|-------------|----------------|------------|----------------|--------|------------|-------------|
| Unit | ft | ft | ppm | ppm | ppm | ppm | ppm | ppm | ppm | ppm | ppm | ppm |
| GW Human Health Cleanup | | | 0.056 | 0.06 | 0.0046 | 1.5 | 0.015 | 2.2 | 0.0017 | | 1.1 | 0.19 |
| 10/05/2023 | -- | -- | 0.06620 | 0.01990 | 0.0011200 | 1.22 | 0.02880 | 0.11 | 0.000201000 | — | U(0.00100) | 0.13 |
| 09/03/2024 | -- | -- | 0.663 | 0.02160 | 0.0012800 | 1.58 | 0.02670 | 0.853 | 0.01610 | — | U(0.00100) | 0.161 |