ENVIRONMENTAL MANAGEMENT, INC.
CONSULTING, ENGINEERING & TRAINING | A BSNC COMPANY

July 19, 2022

Petro 49, Inc.
2101 63rd Avenue
Anchorage, Alaska 99507
Attn: Russell Cooper

Via Email: russellc@shoresidepetroleum.com

RE: Petro49 Marina, 843 Fish Dock Road, Homer, Alaska (Facility ID No. 696)
Subj: Statement of Work

Environmental Management, Inc. (EMI) has been providing environmental services related to the decommissioning of underground storage tanks (UST) for over 30 years. This letter summarizes the procedures EMI typically employs to ensure compliance with the applicable Alaska Department of Environmental Conservation (ADEC) regulations. The regulations that pertain to UST decommissioning include *Underground Storage Tanks* 18 Alaska Administrative Code (AAC) 78, *ADEC UST Procedures Manual,* ADEC *Field Sampling Guidance*, and if contamination is encountered 18 AAC 75 *Oil and Other Hazardous Substances Pollution Control is* applied as appropriate.

EMI provides Qualified Environmental Professionals (QEP) and Qualified Samplers, as defined by ADEC, to perform site assessments during and following the removal of the UST(s) and associated appurtenances. EMI also has certified UST Workers on staff that can direct the entire decommissioning in the event the UST removal contractor is not certified.

EMI's primary role is to conduct post closure site assessments as required under18 AAC 78.90. To satisfy these requirements EMI does the following:

- Upon arrival on site, the site is inspected for staining and other indicators or contamination.
- During excavation EMI inspects exhumed and in-situ soils for contamination. This is done via physical inspection and by utilizing a photo ionization detector (PID) to identify volatile components of petroleum contamination.
- Headspace field screening and analytical samples are collected from all locations as required under 18 AAC 78.90 and the *UST Procedures Manual*. These locations include below lines, fittings, dispensers and the tanks themselves. When suspect soils are encountered the additional sampling requirements of the *Field Sampling Guidance* and 18 AAC 75 are also incorporated.
- Throughout excavation the exhumed soils are inspected using the PID by both ambient soil vapor readings and headspace samples. If suspect soils are encountered short-term stockpiles are created to the specifications of 18 AAC 75 so that the suspect material can be stored pending characterization.
- Once the tanks have been removed from the ground the limits of excavation are characterized using headspace field screening and analytical sampling. In the event contamination is not encountered the sampling frequencies used are those presented in 18 AAC 78. If contamination is encountered the sampling frequencies of the *Field Sampling Guidance* are employed.
- Analytical samples are analyzed for the analytes listed in Table F of the Field Sampling Guidance, based on type(s) of product contained within the UST.
- Once analytical sample results are obtained an EMI Project Manager reviews all data and an ADEC Laboratory Data Review Checklist is completed to determine if there were any laboratory QC

failures or other discrepancies that would invalidate the data. One the data has been verified the result are compared to ADEC's Method Two cleanup levels presented in Tables B1 and B2 of 18 AAC 75.

- A comprehensive report is then produced which narrates the field activities and any significant findings. The laboratory results are also presented and if there is confirmed contamination remaining at the site recommendations on how to proceed, including additional site characterization work are made. The ADEC Site Assessment and Release Investigation (SARI) form will submitted along with the report within 45 days, as required by 18 AAC 78.

Sincerely,
Environmental Management, Inc.

Glenn Hasburgh
Project Manager, ADEC Certified UST Worker

UNDERGROUND STORAGE TANKS
ADEC NOTICE OF *INTENT TO CLOSE* OR *CHANGE-IN-SERVICE*

The ADEC notice of *Intent-to-Close or Change-in-Service* (Form 18-0504) is required when decommissioning an underground storage tank (UST) system, or changing its use to a non-regulated substance (i.e., heating oil), in accordance with Title 18 Alaska Administrative Code (AAC) 78, *Underground Storage Tanks*. Notification is due at least 15 days, but no more than 60 days, prior to beginning the closure, site assessment and release investigation work. *(18 AAC 78.085(a)).*

1. ADEC FACILITY INFORMATION

UST SYSTEM OWNER: Shoreside Petroleum	EXPECTED DATE of CLOSURE: 7/25/21	ADEC FACILITY #: 2527
UST CLASS A/B OPERATOR:	FACILITY NAME: International Tesoro	
OPERATOR CONTACT: PHONE/EMAIL	PHYSICAL ADDRESS: 724 W. International Airport rd	
IF A *CHANGE-IN-SERVICE*, NEW USE: Closure	CITY: Anchorage	ZIP: 99518

2. CLOSURE *OR* CHANGE-IN-SERVICE *FOR* UST SYSTEMS:

ADEC TANK #	OWNER TANK #	✓CLOSURE FOR: TANK & PIPING	TANK ONLY	PIPING ONLY	PRODUCT STORED	VOLUME (GAL)	LAST DATE USED
4	4	x			Diesel	12000	7/25/21
5	5	x			Gasoline	12000	7/25/21
6	6	x			Gasoline	12000	7/25/21

3. CERTIFIED UST WORKER AND QUALIFIED ENVIRONMENTAL PROFESSIONAL:

Anyone who supervises or performs closure or change-in-service of a UST system is required to be a state-licensed UST worker certified in Closure *(18 AAC 78.455).* An owner or operator may not allow a person to conduct any part of a UST system closure unless the person is a licensed UST worker certified in closure *(18 AAC 78.400(a)).* An owner or operator shall ensure a qualified environmental professional (QEP) performs the site assessment and release investigation *(18 AAC 78.088).*

NAME OF LICENSED UST WORKER CERTIFIED IN CLOSURE: randy
LICENSE #: 612
EXPIRATION DATE: 12/31/21

NAME OF QUALIFIED ENVIRONMENTAL PROFESSIONAL: Larry Helgeson *(defined in 18 AAC 78.088)*
COMPANY: EMI
PHONE: 907-229-7030

4. CHECKLIST

NOTE: CLOSURE means to remove, or make inert, any part of a UST system, so that it can no longer receive, store or issue petroleum products *(18 AAC 78.085(c)).* CHANGE-IN-SERVICE means to remove all products, and fully clean the UST system, to continue to use it for a non-regulated substance *(18 AAC 78.085(d)). I CERTIFY THE FOLLOWING IS TRUE AND CORRECT:*	YES	NO
NOTIFIED LOCAL FIRE DEPARTMENT OF INTENT TO CLOSE OR CHANGE-IN-SERVICE?		x
THERE IS EVIDENCE OF A RELEASE, LEAK OR SPILL AT THIS SITE?		x

METHOD OF CLOSURE: [✓] REMOVAL [ ] INERT-IN-PLACE [ ] CHANGE –IN-SERVICE

DISPOSAL OF TANK: [✓] RECYCLE COMPANY: CEI
[ ] LANDFILL LOCATION: anchorage

DISPOSAL OF PIPING AND EQUIPMENT: [ ] RECYCLE [✓] LANDFILL LOCATION: Hiland land fill

DISPOSAL OF FREE FLUIDS, PETROLEUM PRODUCTS AND/OR SLUDGES: US Ecolgoy

The UST Worker and Owner/Operator are required to complete and sign the *Notice of Post-Closure* (ADEC Form 18-0505) within 30 days of the tank pull. The Owner must submit the *Site Assessment and Release Investigation Report* within 60 days to ADEC.

CERTIFIED BY: [ ] OWNER [ ] OPERATOR [✓] OTHER TITLE: Senior Construction Manager PHONE: 907-841-6146
PRINT NAME:
SIGNATURE: DATE: 06/21/21 FAX: 907-357-1351

APPENDIX B

ADEC Storage Tank Program
Site Assessment & Release Investigation Summary Form

This document summarizes information from site assessments and release investigation reports that are required by Alaska's Underground Storage Tanks Regulations (18 AAC 78). It is intended to ensure minimum requirements are met when submitting full reports to ADEC. It cannot be substituted for comprehensive site assessment or release investigation reports. Site assessments (as defined in AS 46.03.450) are conducted to check for the presence or absence of petroleum contamination. If contamination of soil or groundwater is identified then a release investigation is required. Site assessments and release investigations must be conducted by a qualified impartial third party (as defined in 18 AAC 78) and in accordance with chapter two of the Underground Storage Tanks Procedures Manual (UST Manual).

How to fill out this form

Type or print in ink the requested information and sign in ink the "signature" blocks on page 7. Please attach this form to the comprehensive site assessment or release investigation report (or include it in the report introduction) and submit it to the nearest ADEC field operations office (Juneau, Anchorage, Fairbanks or Soldotna).

1. GENERAL INFORMATION

Purpose of Site assessment/ Release investigation: _____
(Closure, Change-in-service, Suspected or confirmed release, Compliance check, Other)

Owner of site:

_____
Name of company/legal entity that owns the site | Phone number

_____
Mailing address | City, State, Zip code

Operator of site:

_____
Name of company/legal entity that operates the site | Phone number

_____
Mailing address of operator | City, State, Zip code

Location of site:

_____
Name of site (e.g. John Doe's Service Station) | Phone number

_____
Physical address of site (be as specific as possible) | City, State, Zip code

_____ | _____
Legal description of site | Section/township/range

_____ | _____
Type of business at site | Facility ID # / Tank ID number(s)

Financial Assistance Applications filed (this site only)	☐ Site assessment/ tightness test	☐ Tank cleanup	☐ Tank upgrade	☐ Tank closure
Reports on file with ADEC:	☐ Tightness test	☐ Closure notice	☐ Other_____	

2. SYSTEM AND TANK STATUS

Describe the status, size, and contents of the tanks that have been at the site:

Tank ID Number:	Tank No. ___	Tank No. ___	Tank No. ___	Tank No. ___	Tank No. ___
Tank status (check one) Currently in use	_____	_____	_____	_____	_____
Temporarily closure	_____	_____	_____	_____	_____
Closed/left in place	_____	_____	_____	_____	_____
Closed/removed	_____	_____	_____	_____	_____
Total capacity (gallons)	_____	_____	_____	_____	_____
Contents (diesel, etc)	_____	_____	_____	_____	_____

3. FIRM CONDUCTING SITE ASSESSMENT AND RELEASE INVESTIGATION

Name of firm	Phone number
Mailing address	City, State, Zip code
Site assessment supervisor(s)	Person(s) collecting samples

4. SITE HISTORY

Based on the best available knowledge, please check the appropriate box below:

Y	N	
__	__	Was soil contamination observed or identified?
__	__	Was groundwater contamination observed or identified?
__	__	Did inventory control or prior tank repairs indicate a possible release?
__	__	Has a tank tightness test been performed on any USTs on the site?
__	__	Have any of the facility's USTs or piping ever failed a tightness test?
__	__	Have there been any previous site assessments performed at this site?
__	__	Do previous site assessments indicate any contamination has occurred?

If the answer to any of these questions is yes, please describe (or attach copy of report discussion). Give dates and circumstances, use continuation sheet if necessary:

5. FIELD SCREENING ANALYSIS

Date(s) of field screening:_____
Temperature(s) during screening:_____
Estimated wind speeds:_____
Weather (clear, raining, etc):_____

Type of field detection instrument used:_____
Brand:_____
Model: _____
Date calibrated: _____

Number of tests:_____
Range of results:_____

If an instrument wasn't used, what field detection method was used?_____

Number of tests:_____
Range of results:_____

6. COLLECTION OF SOIL SAMPLES

For site assessments done for USTs remaining in place

Check the appropriate boxes below (if not applicable, leave blank):

Y	N	
__	__	Were samples taken from borings (or test pits) within 5 feet of the UST?
__	__	Were samples collected from within 2 feet below the bottom of the UST?
__	__	Were dispensers connected to the UST system?
__	__	Were samples taken from borings (or test pits) adjacent to dispensers?
__	__	Were samples taken from borings (or test pits) adjacent to piping?

How many borings/pits were made?_____ How many samples were analyzed? _____

For site assessments done at excavation and removal of USTs:

Check the appropriate boxes below (if not applicable, leave blank):

Y	N	
__	__	Were any areas of obvious contamination identified or observed?
__	__	Were samples taken from areas of obvious contamination?
__	__	Were at least two discrete analytical samples taken from excavated pit area?
__	__	Was at least one sample taken from below each dispensing island's piping?
__	__	Was at least one sample taken from the piping trench?
__	__	Were the samples referenced above collected taken from native soil within two feet below the bottom of the tank pit or dispenser/piping trench?
__	__	If multiple tanks were removed, were at least three samples collected?
__	__	Were additional samples collected for each 250 square feet of excavated pit over 250 square feet?

Number of distinct points sampled:_____ Estimated excavation's surface area: _____

For all site assessments

Check the appropriate boxes below:

Y	N	
__	__	Were field duplicate samples collected and analyzed?
__	__	Were all samples kept at the appropriate temperature until analysis?
__	__	Were all samples extracted & analyzed within recommended holding times?
__	__	Did chain-of-custody/transfer logs accompany samples to laboratory?

7. LABORATORY ANALYSIS OF SOIL SAMPLES

(see Table 1 of UST Procedures Manual or Table G of 18 AAC 78.800(b))

Identify the possible contaminants (gasoline, BTEX, diesel, etc.): _____

Please list the analytical methods used to detect these contaminants in the soil samples, the number of samples analyzed by each method, and the range of results for each method:

Possible product	**Analytical method**	**Number of samples**	**Range of results**	**Location(s) of sample point(s) w/ highest level of contamination**
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

8. GROUNDWATER INVESTIGATION

Check the appropriate boxes below:

Y	N	
__	__	Was groundwater encountered during the excavation or drilling work?
__	__	Were borings drilled/pits dug at least five feet below the USTs bottom?
__	__	Is groundwater or seasonal high water table known or suspected to exist within five feet of the bottom of the USTs?
__	__	Were samples taken from borings drilled/test pits dug to this water level?
__	__	Were all these samples analyzed within recommended holding times?

How many groundwater/saturated-soil samples were collected & analyzed? _____

How many of these samples were taken from the top 6" of water table? _____

How many field QC samples were analyzed? _____ _____ _____

Trip blanks Duplicates Decon blanks

9. LABORATORY ANALYSIS OF GROUNDWATER SAMPLES

(see Table 1 of UST Procedures Manual or Table G of 18 AAC 78.800(b))

Identify the possible contaminants at the site: _____

Identify the analytical methods used to detect these contaminants in the water samples, the number of samples analyzed by each method, and the range of results for each method:

Analytical method	**Number of samples**	**Range of results (ppm)**	**Location(s) of sample point with highest level of contamination**
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

10. DISPOSAL OF MATERIALS

Check the appropriate boxes below (if not applicable, leave blank):

Y	N	
__	__	Were tanks cleaned in accordance with API 2015 (Cleaning Petroleum Storage Tanks)?
__	__	Were the tanks and piping removed and disposed in accordance with API 1604 (Removal and disposal of used petroleum Storage tanks)?

Where were the tanks and piping disposed?_____

_____

Where was the tank sludge and rinsewater disposed?_____

11. STOCKPILES

Check the appropriate boxes below:

Y	N	
__	__	Is any soil stockpiled at the site?
__	__	Are soils stockpiled in accordance with 18 AAC 78.311?

12. RELEASE INVESTIGATION

Check the appropriate box below:

Y N

__ __ Was any petroleum contamination identified during site assessment?

(Answer "yes" if any evidence a release occurred; if no, proceed to item 13)

If contamination was found, what was matrix score for site? _____

(Attach completed matrix score sheet to this form)

When did release occur?_____ When was release confirmed? _____

(Date & time) (Date & time)

When was ADEC notified? _____ List ADEC staff notified:_____

(Date & time) (Name)

What is status of UST that prompted the investigation? ____ In use; _____ Out-of-use, product still in system; _____ Out-of-use; system empty; _____ Permanently closed

Briefly describe (or attach copy of report discussion) the steps taken to prevent further migration of the release and steps taken to monitor and mitigate fire and safety hazards:_____

_____

_____

_____

13. SITE SKETCH

Sketch the site in the space below. Alternatively, attach a site map to the back of the form. The sketch (or accompanying narrative) should include the following information:

- locations of all USTs, piping, and dispensers
- distances from tanks to nearby structures
- property line locations
- location and dimensions of excavation(s)
- type of backfill used to surround system
- locations of any known historical releases
- locations of any observed contamination
- location of any boreholes and test pits
- soil types
- field screening locations and readings
- sampling locations, depths, & sample ID numbers
- water wells and monitoring wells (if present)
- depth to groundwater/seasonal high groundwater
- locations of any stockpiled soils
- north arrow
- bar scale (specify feet or meters)

For release investigations, in addition to the above information, show the groundwater gradient; surface drainages (including potential hydraulic connections with groundwater) and utility trenches.

14. QUALITY ASSURANCE

Check the appropriate boxes below:

Y	N	
__	__	Were there deviations from Chapter 2 of the UST Procedures Manual? (Note that any deviations must be documented in a section of the comprehensive report)
__	__	Is a field quality control summary included in the reports?
__	__	Is a laboratory QC summary included in the report for all samples used to verify cleanup levels have been met?

15. CERTIFICATION

The following certification is to be signed by the assessment firm's principal investigator or Quality Assurance Officer:

I certify that except as specifically noted in this report, all statements and data appearing in this report are in conformance with the provisions of Chapter 2 of the UST Procedures Manual.

_____	_____
(Print name)	(Title)
_____	_____
(Signature)	(Date)

The following certification is to be signed by the UST owner/operator (or designated representative):

I certify that I have personally examined and am familiar with the information in this and all attached documents and based on my inquiry of the individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

_____	_____
(Print name)	(Specify if owner, operator, representative)
_____	_____
(Signature)	(Date)
_____	_____
(Street Address)	(City, State, Zip)

16. ATTACHMENTS

Please check the boxes showing any comprehensive reports attached to this summary:

____ Site Assessment Report (include if no release investigation is needed)

____ Release Investigation Report (include if release investigation is needed)

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
UNDERGROUND STORAGE TANKS - NOTICE OF POST CLOSURE

- ⇨ An owner or operator of an underground storage tank (UST) system to be permanently closed is required to notify the department in accordance with Title 18 Alaska Administrative Code (AAC) *Underground Storage Tanks*.
- ⇨ *"Permanently Closed"* means to remove petroleum and sludges from the UST system and either remove, dismantle and recycle/dispose of the tank, piping and ancillary equipment, or fill it with inert solid material.
- ⇨ A UST system located at a contaminated site, or that has had a confirmed release, must be permanently removed from the ground; an in-place closure is not allowed *(18 AAC 78.085)*.
- ⇨ A licensed UST worker, certified in closure, is required to be onsite and physically supervise closure or a change-in-service of a UST system *(18 AAC 78.400 and 78.455(a)(2))*.
- ⇨ A qualified environmental professional must meet the conditions of 18 AAC 78.088, including conducting or supervising the collection of field data, and the interpretation and reporting of the site characterization and site assessment *(18 AAC 78.090(e))* as well as the collection and reporting of release investigation data *(18 AAC 78.235(b))*.

I. UST OWNER		II. UST FACILITY	
NAME:		FACILITY NAME:	ADEC FAC #
ADDRESS:		PHYSICAL LOCATION:	
CITY:	STATE/ZIP:	CITY:	FACILITY PHONE:
UST CLASS A/B OPERATOR:		UST CLASS A/B OPERATOR PHONE /EMAIL	

III. UST CLOSURE WORKER		IV. QUALIFIED ENVIRONMENTAL PROFESSIONAL
NAME:	LICENSE #:	NAME:
COMPANY:		COMPANY:
ADDRESS:		ADDRESS:
CONTACT PHONE:		CONTACT PHONE:
EMAIL ADDRESS:		EMAIL ADDRESS:

V. TANK AND CLOSURE DETAILS

USE THE ADEC TANK NUMBER:	TANK #	TANK #	TANK #	TANK #	TANK #
DATE OF CLOSURE:					
PRODUCT (gasoline, diesel, used oil, etc.):					
CAPACITY of tank in Gallons:					
DATE PRODUCT was last stored:					
METHOD OF CLOSURE: *REMOVAL AND DISPOSAL*	Landfill ☐ Recycle ☐	Landfill ☐ Recycle ☐	Landfill ☐ Recycle ☐	Landfill ☐ Recycle ☐	Landfill ☐ Recycle ☐
INERT-IN-PLACE					
CHANGE-IN-SERVICE					
CONTAMINATION observed?					
DATE OF SITE CHARACTERIZATION :					
DATE OF SITE ASSESSMENT:					
DATE OF RELEASE INVESTIGATION:					

V. OWNER CERTIFICATION TANK IS CLOSED IN ACCORDANCE WITH 18 AAC 78

- ⇨ The Owner/Operator is required to complete and submit the *Notice of Post Closure* within 30 days of the tank being pulled, made inert-in-place, or changed-in-service *(18 AAC 78.085(f) and 78.100(d))*.
- ⇨ The Owner/Operator must ensure the *Site Assessment and Release Investigation Report* is complete and submitted within 60 days of closure *(18 AAC 78.090(d)(5) and 78.100(e))*.

CERTIFIED BY: OWNER ☐ OPERATOR ☐ DATE: PHONE:

PRINT NAME: SIGNATURE:

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
UNDERGROUND STORAGE TANKS - CLOSURE CHECKLIST

- ⇨ A licensed UST worker who performs or supervises a UST system closure must initial and sign this checklist.
- ⇨ Handwritten initials are required next to the work items which were completed.
- ⇨ The UST worker is required to submit this certification to the department within 30 days of the UST system being removed, made inert or changed-in-service *(18 AAC 78.085(f) and 78.100(d))*.

VI. UST WORKER CHECKLIST - TANKS ARE CLOSED IN ACCORDANCE WITH 18 AAC 78

I CERTIFY:	I understand that a certified UST worker who fails to submit this portion of the documentation may be subject to license suspension or revocation *(18 AAC 78.455(a)(9) and 78.470(a)(3))*.
I CERTIFY:	*UST SYSTEM REMOVAL*
	I was on the job site for all work requiring certification of permanent closure *(78.455(a)(2))*
	Contents of tank and piping were emptied
	Tank was purged of flammable vapors or the atmosphere was made inert
	UST cleaning and closure procedures were used in accordance with the published Recommended Practices (RP) adopted by reference in 18 AAC 78.085(g) as applicable, e.g., the American Petroleum Institute (API) RP-1604, *Closure of Underground Storage Tanks*
	Tanks, piping and vent lines were removed, labeled, and properly disposed
	All accessible holes were filled, plugged or capped
I CERTIFY:	*UST SYSTEM CLOSURE IN THE GROUND (INERT-IN-PLACE)*
	I was on the job site for all work requiring certification of permanent closure *(78.455(a)(2))*
	Contents of tank and piping were emptied
	Tank was purged of flammable vapors or the atmosphere was made inert
	UST cleaning and closure procedures were used in accordance with the published Recommended Practices (RP) adopted by reference in 18 AAC 78.085(g) as applicable, e.g., the American Petroleum Institute (API) RP-1604, *Closure of Underground Storage Tanks*
	Tank(s) were filled with solid inert material [type of material: _____]
	Piping and vents were removed, and all accessible holes were filled, plugged or capped
I CERTIFY:	*UST SYSTEM CHANGE IN SERVICE (FROM REGULATED TO NON-REGULATED USE)*
	I was on the job site for all work requiring certification of permanent closure *(78.455(a)(2))*
	Contents of tank and piping were emptied
	Tank was purged of flammable vapors or the atmosphere was made inert
	UST cleaning and closure procedures were used in accordance with the published Recommended Practices (RP) adopted by reference in 18 AAC 78.085(g) as applicable, e.g., the American Petroleum Institute (API) RP-1604, *Closure of Underground Storage Tanks*
	UST system(s) were disconnected from regulated use
	Piping connection with regulated use was removed and fitting hole capped or plugged

VII. UST WORKER CERTIFICATION - TANK(S) ARE CLOSED IN ACCORDANCE WITH 18 AAC 78

ALASKA UST CLOSURE WORKER LICENSE # DATE: PHONE:

PRINT NAME: SIGNATURE:

Owner/Operator is required to complete and sign page 1 of this *Notice of Post-Closure*. The UST Closure Worker who supervised permanent closure of the UST system(s) must complete and sign page 2 *(78.455(a)(9))*. Submit the document within 30 days of tank removal, inert-in-place or change-in-service, to the department's UST Office.