STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE
CONTAMINATED SITES PROGRAM

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File: 2569.26.007

April 25, 2012

Kurt Esveldt
Trident Seafoods, Inc.
5245 Shilshole Ave. NW
Seattle, Washington 98107

Re: ADEC Decision Document; Trident Seafoods – King Salmon
Corrective Action Complete Determination

Dear Mr. Esveldt:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Trident Seafoods – King Salmon site, located at Lease Lot 1, Block 100, King Salmon Airport, in King Salmon, Alaska. 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 at this time.

This decision is based on the administrative record for this site, which is located in the offices of the ADEC in Soldotna, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in this Corrective Action Complete determination.

Introduction

Site Name and Location:
Trident Seafoods – King Salmon
Lease Lot 1, Block 100, King Salmon Airport
King Salmon, Alaska

Name and Mailing Address of Responsible Party:
Kurt Esveldt
Trident Seafoods, Inc.
5245 Shilshole Ave. NW
Seattle, Washington 98107

Name and Mailing Address of Land Owner:
State of Alaska
Department of Transportation & Public Facilities
James Thorsness, Airport Leasing Specialist III
P.O. Box 196900 MS-2525
Anchorage, Alaska 99519-6900

ADEC Site Identifiers
Reckey: 1994250015751
File: 2569.26.007
Hazard ID: 23523

Regulatory authority under which the site is being cleaned up:
18 AAC 75 and 18 AAC 78

Background
The Underground Storage Tank system at this site was originally owned and operated by Farwest Fisheries when the facility was used as a cold storage and processing center for seafood. Through a company merger, the property is now leased by Trident Seafoods and the building is owned by Trident Seafoods. This site has been impacted by aviation fuels from leaks and/or spills associated with one 6,500-gallon underground storage tank (UST) and associated piping and dispenser system. This UST reportedly contained aviation fuel product during the history of use from an unknown date until May of 1986. Soil and/or groundwater samples collected at this site have been tested for: gasoline range organics (GRO), diesel range organics (DRO), benzene, toluene, ethylbenzene, and xylene (BTEX), ethylene dibromide (EDB), 1,2–Dichloroethane (EDC), and lead.

Site Characterization and Cleanup Actions
On June 6, 1994 the 6,500-gallon aviation gas UST and dispenser was removed. During the removal process the source of the release was found to be from a union fitting between the dispenser and the turbine pump. Sheen was observed on the water within the tank excavation pit. Due to the close proximity to an active airport taxiway and runway, the excavated soils and import fill was placed back into the excavation on top of a plastic tarp. Confirmation soil samples detected GRO at 653 mg/kg and 2,670 mg/kg at 7.5 feet below ground surface (bgs), and the water sample taken in the excavation bottom detected GRO at 7.36 mg/L.

In July of 2006 eight test pits and six additional shallow test pits were conducted to further define the vertical and horizontal extent of the soil and groundwater contamination. Gasoline odors and sheens were noted in the soils and on the groundwater at depths between 9 and 14 feet bgs in the area of the former UST location. GRO, DRO and toluene soil contamination was encountered at a depth of 10 feet bgs at 1,030 mg/kg, 395 mg/kg, and 13.2 mg/kg respectively. Benzene was encountered at 10 to 15 feet bgs at concentrations of 0.0363 and 0.8160 mg/kg in the former UST excavation pit. A supply well is located south of the Trident Seafoods Building. A water sample from this well was collected and analyzed. No petroleum analytes were detected. It is reported that this water supply well is not used as a potable water supply for the facility.

On August 4, 2010, four soil borings were advanced and developed into monitoring wells to further characterize the presence and/or extent of the soil and groundwater contamination at the site. GRO at 830 mg/kg, benzene at 3.4 mg/kg, toluene at 37 mg/kg and ethylbenzene at 10 mg/kg were detected at 9 feet bgs in the soil boring advanced in the area of the former UST. The groundwater sample taken within this boring was made into a monitoring well and detected benzene at 0.062 mg/L, GRO at 2.8 mg/L, DRO at 3.0 mg/L and lead at 0.031 mg/L.

On August 15, 2011, the second groundwater sampling event was conducted at the site with only benzene at 0.0327 mg/L detected in the one monitoring well within the former UST excavation area. The other three monitoring wells installed at the site did not detect any of the analytes tested for. The results of a Drinking/Potable Water Well Survey confirmed that there were none within 1,000 feet of the former UST location, and the on-site well is not used as a potable water supply source. The area businesses use Penn Air (located at the airport terminal) for the restroom facility, and the only known water source is a 100-gallon tank at Tibbetts Airmotive used for washing planes. This tank is supplied from an off-site source.

Following corrective actions performed at this site, residual GRO, DRO, benzene, toluene and ethylbenzene concentrations in subsurface soil at this site exceeded ADEC's Method Two 'Migration to Groundwater' soil cleanup levels within the former UST location at 9 to 15 feet below ground surface. Benzene at this site exceeded ADEC's Table C groundwater cleanup levels within the former UST location.

Contaminant of Concern

During the investigations at this site, soil and/or groundwater samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), benzene, toluene, ethylbenzene, and xylenes (BTEX), ethylene dibromide (EDB), 1,2–Dichloroethane (EDC), and lead. Based on these analyses, the following Contaminants of Concern remain in subsurface soil and/or groundwater near the former underground storage tank location:

- GRO
- DRO
- Benzene
- Toluene
- Ethylbenzene

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater, Under 40 Inch Zone.

Contaminant	Site Cleanup Level (mg/kg)
• GRO	300
• DRO	250
• Benzene	0.025
• Toluene	6.5

- Ethylbenzene 6.9

The default groundwater cleanup levels for this site are established in 18 AAC 75.345, Table C Groundwater Cleanup Levels.

Contaminant	Site Cleanup Level (mg/L)
• Benzene	0.005

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, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-minimis Exposure	Impacted surface soils meet ADEC's ingestion soil cleanup levels.
Sub-Surface Soil Contact	De-minimis Exposure	Contamination remains in the subsurface, but is well below direct contact cleanup levels. Subsurface soils meet ADEC's ingestion soil cleanup levels.
Inhalation – Outdoor Air	De-minimis Exposure	Contamination remains in the subsurface, but is well below ADEC outdoor inhalation soil cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-minimis Exposure	There is a building at the site, however residual soil contaminant levels should pose no unacceptable risk to indoor air quality.
Groundwater Ingestion	Pathway Incomplete	Groundwater is not used as a drinking water source. An Institutional Control exists on the King Salmon Airport, prohibiting the use of the shallow groundwater as a drinking water source.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	No exposure to ecological receptors is possible unless subsurface soils are excavated and relocated/transported offsite.

Notes to Table 1: "De-minimis Exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal mass of remaining contamination. "Pathway Incomplete" means that in ADEC's judgment contamination has no potential to contact receptors.

ADEC Decision

The cleanup actions to date have served to excavate and adequately reduce contaminant concentrations at this site. Contamination remains on site in subsurface soil and groundwater above established default cleanup levels; however ADEC has determined there is no unacceptable risk to human health or the environment. Therefore, we are issuing this Corrective Action Complete determination, subject to the following condition:

1. The most current soil sample analytical data reported GRO, DRO, benzene, toluene and ethylbenzene contaminations exceeding the applicable soil cleanup levels, within the former underground storage tank location. Any proposal to excavate, transport, move, treat, and/or dispose of residual contaminated soil at this "site" requires prior ADEC approval. This is consistent with the requirements of 18 AAC 78.274(b), and 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.
2. Off site public water service is provided to this property. Water wells may not be installed on this property without the prior notification and approval of ADEC.
3. All groundwater monitoring wells associated with this project must now be properly decommissioned in accordance with ADEC's November 2011 Monitoring Well Guidance. Trident Seafoods, Inc. must now prepare and provide ADEC with a work plan which identifies proposed decommissioning procedures for ADEC review and approval prior to implementation of those procedures. Decommissioning work should be completed when frost is not present in the soil. The decommissioning of these wells should occur before September 15, 2012, and must be documented in a written report submitted to ADEC by December 15, 2012. This work must be performed or directly supervised by a 'qualified person', as defined in 18 AAC 78.995(118), and the report must be signed by a qualified person.

The unused water supply well located south of the Trident Seafoods Building should be also be properly decommissioned in accordance with Alaska Drinking Water regulations, 18 AAC 80.015. Trident Seafoods and/or the ADOT&PF should coordinate with ADEC's Drinking Water Program to ensure this work is performed in compliance with applicable law. Jim Macinnis [(907) 269-3076] with ADEC's Drinking Water Program, in Anchorage, could be contacted for further regulatory direction.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status to 'Cleanup Complete', and will include a description of the residual petroleum contamination remaining at the site.

Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

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 future information indicates that this "site" may pose an unacceptable risk to human health or the environment. Trident Seafoods would remain liable for any additional assessment and/or cleanup action(s), should ADEC

impose such a requirement.

Appeal

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 -18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have questions about this Corrective Action Complete decision, or any other aspect of this project, you may phone me at (907) 262-3412, or contact me via e-mail at peter.campbell@alaska.gov

Approved By,

Paul Horwath, P.E.
Engineer I, DEC

Recommended By,

Peter Campbell
Environmental Program Specialist

Cc: Joseph Gallagher, Rory Galloway, G-Logics
James Thorsness, ADOT&PF Airport Leasing Specialist III, Anchorage
James Micinnis, ADEC Drinking Water Program, Anchorage