THE STATE of ALASKA
GOVERNOR SEAN PARNELL

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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Main: 907-465-5210
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File No: 1508.38.014

January 30, 2014

Ms. Bev Niemann, Environmental Coordinator
Delta Western Incorporated
PO Box 79018
Seattle, WA 98119

RE: Decision Document: Delta Western Tank Farm Haines
Cleanup Complete Determination -- Institutional Controls

Dear Bev,

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has reviewed the environmental records for the referenced site. This decision letter explains the site history, cleanup activity and specific conditions required to effectively manage any remaining contamination. No additional remedial action is required as long as compliance with these conditions is maintained.

Site Name and Location
Delta Western Tank Farm Haines
56 Haines Highway
Haines, Alaska 99827
Tract A Lot 1 Mission Subdivision

Address of Contact Party
Bev Niemann
Delta Western Incorporated
PO Box 79018
Seattle, WA 98119

DEC Site Identifiers
DEC Reckey: 1998110111501
File: 1508.38.014
Hazard ID: 2970

Regulatory Authority for Determination
Title 18 Alaska Administrative Code (AAC) 75

Site Description and Background

The site is located on a property that resembles a triangle with Haines Highway on the longest side to the southwest, Front Street on the second longest side to the east and a city park on the third side to the north. Most of the property slopes gently from the highway toward the city park forming the upper operations area. Rising up from the drainage ditch along Front Street is a vegetated embankment

extending the full length of the east side of the property separating the upper area from the much smaller lower operations area.

From the north side extending to the center and encompassing nearly half of the property is a lined and walled fluid containment area that surrounds large capacity, above-ground fuel storage tanks (ASTs). In a smaller containment area in the southeast corner of the property is a group of smaller ASTs. The remaining segments of the upper operations area contain a warehouse, a paved vehicle dispenser pumping station, a paved tank truck loading rack and a parking area in the northwest corner. The lower operations area is comprised of a warehouse adjacent to Front Street.

The upper operations area is graded so that surface runoff flows into drains that lead to an oil/water separator (OWS) system. Excess water from the AST containment is also directed to the OWS for treatment before release to the municipal storm water system. Portage Cove and a fuel barge dock are located approximately 350 feet east from the facility. The barge fuel transfer piping from the dock to the ASTs has been decommissioned. The marine waterfront of Portage Cove is habitat for birds and waterfowl, including eagles, ravens, and seagulls. Groundwater at the site is intermittent, shallow and is under direct influence of surface water. It is not used for drinking water or any other purpose. The facility is served by municipal drinking water and sewer systems.

Figure 1. Current layout of the tank farm.

The facility was originally built by Chevron in 1935. Chevron sold it to David Karl Black in 1984. Mr. Black operated the facility as a Chevron station under the name Valley Fuel Services, Inc. In 1986 he sold it to Haines Terminal and Highway Company (also known as White Pass). In 1995, White Pass sold the facility to Petro Marine Services (PM). In 2002, PM sold the facility to its current owner, Delta Western (DW).

During a compliance inspection in 1995 the DEC Industry Preparedness and Prevention Program (IPP) observed deficiencies and negotiated a compliance order by consent (COBC) with PM to install spill containment under the truck rack, repair the oil water separator (OWS) system and excavate two areas of oil stained soil outside secondary containment. In 1998, IPP requested the Contaminated Sites Program (CS) oversee the excavation of the stained soil adjacent to the truck rack containment.

In January 1996 and May 1998, oily water began collecting in the drainage ditch at the base of an embankment separating the upper operations area and the lower operations area. At first, PM removed the oil with absorbent pads then later resorted to pumping the water into a newly installed oil/water separator. During the facility refurbishing in 1998, PM removed contaminated soil from the embankment and replaced it with large rock fill. Workers stored the excavated soil in the facility parking area.

The facility was refurbished from 1996 through 1998. A new oil/water separator was plumbed in 1996. New above liner and below liner sumps were plumbed in the tank farm containment areas in 1997 and 1998. In spring 2001, PM repaired the truck rack containment pad in accordance with an IPP request.

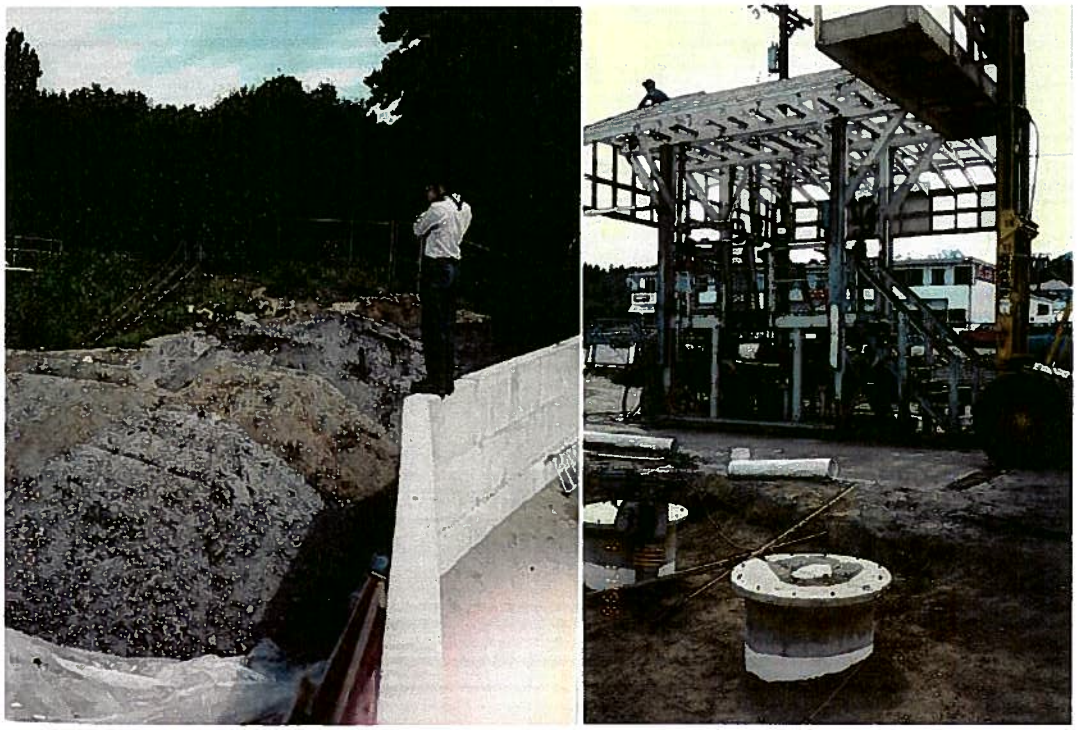

Figure 2. Soil stockpiles and installation of the OWS system near truck rack in 1996

Excavation around ASTs in 1996 encountered soil with weathered petroleum contamination from a historical release. PM reported the discovery to the DEC Prevention and Emergency Response Program (PERP). PERP approved a work plan to remove contaminated soil to bedrock depth and stockpile it between liners on-site. In July of that year, PERP and CS inspected the stockpile and estimated the volume at between 80 and 100 cubic yards of contaminated soil. CS suggested PM submit a plan for approval to remediate the soil on-site using an enhanced natural attenuation method that has proven to be successful in remediating weathered petroleum in soil.

Contaminants of Concern
The following petroleum contaminants of concern are those above cleanup levels that were identified during the course if the site investigations summarized in the Characterization and Cleanup Activities section of this decision letter.

- Diesel Range Hydrocarbons (DRO)
- Gasoline Range Hydrocarbons (GRO)
- Benzene
- Trimethylbenzene

Cleanup Levels
The cleanup level requirements for hazardous substances in soil, groundwater, and surface water at this site are those established in 18 AAC 75.341(d) Method Two in the over 40 inch zone for soil with chemicals listed on 18 AAC 75.341(c) Table B1 and petroleum hydrocarbon ranges listed on 18 AAC 75.341(d) Table B2 . Groundwater criteria listed in Table C at 18 AAC 75.345(b)(1) also apply, and surface water as referenced in 18 AAC 75.345(f) must meet the Water Quality Standards found in 18 AAC 70 for TAqH and TAH (volatile and semi-volatile hydrocarbons). Although groundwater was not investigated for contamination, soil cleanup levels protective of migration to groundwater and in turn, surface water, still apply. The following table displays the cleanup levels for contaminants of concern where there are completed pathways (ingestion, inhalation, direct contact, and soil migration to groundwater and surface water) at this site:

Table 1 – Approved Cleanup Levels

Chemical	Soil (mg/kg)	Groundwater (mg/L)	Surface Water (ug/L)
Benzene	0.025	0.005	N/A
Toluene	6.5	1.0	N/A
Ethylbenzene	6.9	0.7	N/A
Total Xylenes	63	10	N/A
Trimethylbenzene	23	1.8	N/A
GRO	260	2.2	N/A
DRO	230	1.5	N/A
TAqH	N/A	N/A	15.0
TAH	N/A	N/A	10.0

mg/kg = milligrams per kilogram
mg/L = milligrams per liter
ug/L = micrograms per liter

Site Characterization Activities
Site Investigation and Cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 1998. These activities are described below.

In May 1998, CS sent a letter to PM to formalize the Contaminated Sites Program oversight by requesting that PM prepare and submit for approval, a work plan to collect analytical samples in those locations on the property where interim removal of petroleum soil contamination is currently being performed and where removal actions were previously performed without confirmation sampling of

clean soil at the limits of the removal excavation, as required in 18 AAC 75.341. The CS letter recognized that PM was recovering oil daily from the drainage ditch on Front Street and that IPP had a COBC with PM to make upgrades to the truck rack containment due by the end of October, 1998. The CS letter emphasized that PM was required to submit a plan for approval to find the source of a release, clean up the contaminated soil, and collect confirmation samples, all in conjunction with facility upgrades. In June 1998, CS sent PM written notice of State Interest that, in accordance with Alaska Statute 46.03.822 as owner/operator of the facility, PM is a potential responsible party for a pollution incident and for reimbursable costs incurred by the State providing oversight of the cleanup.

Prior to construction of a secondary containment bay beneath the truck rack in spring 2001, PM had excavated stained soil around the truck rack and added it to a stockpile of contaminated soil in the parking area that originated from the embankment excavation. In February 2001, PM arranged to have representative samples collected from the contaminated soil stockpile for laboratory analysis. The results indicated that GRO, DRO, and RRO concentrations in the soil were below cleanup levels.

In a letter dated June 2001, DEC approved unrestricted off-site disposal of the soil. Shortly after that a Phase I Site Assessment of the facility for PM by a local engineering firm concluded that no outstanding environmental issues existed at the facility. However, the contamination source area at the ditch embankment and the stained soil sites at the truck rack had not been cleaned up under a DEC approved cleanup plan and no confirmation soil samples had been collected. Despite this, in 2002 PM sold the facility to DW.

In a letter dated April 2004, DEC requested that the new facility owner Delta Western investigate the historical contaminated soil removal from the truck rack and the storm water drainage ditch on Beach Road to determine the source of the oil releases in 1996 and 1998. After the site remained inactive for several years, in 2007 CS met with DW in Haines and learned that the bulk fuel tank farm was inactive except for a small vehicle fueling station between the parking area and the warehouse in the upper operations area.

Although drive-by observations of the Front Street ditch in 2007 and 2008 gave no indication of contamination, CS sent a request to DW by electronic mail requesting they submit for approval a work plan to characterize the ditch and the truck rack for soil contamination. DW responded with an email stating that the former operator PM was responsible. CS sent a letter to PM requesting they perform a site investigation of the two release sites on the property and in reply they pointed out in the sale agreement that DW expressly agreed to assume the risk of all conditions on or about the property.

After several additional years of inactivity, in May 2011, CS sent Delta Western a letter of State Interest informing the new owner/operator that, in accordance with Alaska Statute 46.03.822, Delta Western is a potential responsible party for the pollution incident and in accordance with AS 46.03.010 and AS 46.08.070 the State is required to recover all appropriate costs associated with providing oversight of investigation and cleanup activities relating to the pollution incident from said responsible party. DEC requested that Delta Western prepare and submit for approval a work plan to assess those locations on the property where contaminated soil cleanup was performed in 1998 but not verified with confirmation sampling as required in 18 AAC 75.341. During a meeting at the Juneau Airport in July, 2011 Delta Western verbally agreed to consider submitting a site investigation work plan.

In August 2011, DEC approved a sampling plan submitted by Chilkat Environmental (CE) for DW with an objective of examining the previous excavation sites at the truck rack and the embankment to find the source of the oil seep in the ditch on Front Street. A search of records found only transfer-related minor spills at the truck rack. As-built drawings of the OWS system (not operational at the time) were not provided in the 2002 property sale, so DW had no idea how the system was constructed or operated. Upon inspection CE found free phase oil in the three OWS system tanks. It appeared as though the oil/water separator located in the upper operations area could be added as a potential source of the historical oil seepage in the lower operations area dating back to 1996.

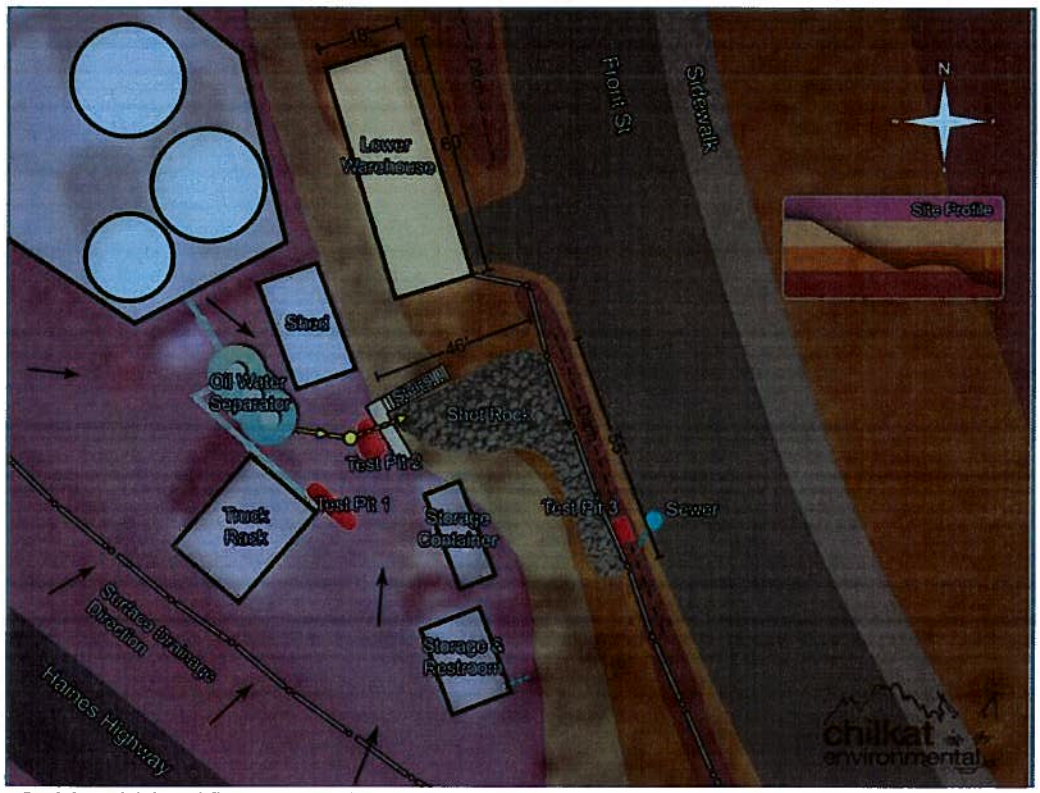

Figure 3. Bold red identifies contaminated subsurface soil in the upper and lower operations areas

During the 2011 site activity, DW emptied free product from water in the OWS system tanks and CE advanced trenches in the upper and lower operations areas to observe subsurface soil conditions and to collect soil and water samples. When CE excavated the rock-filled embankment between upper and lower operations areas, they discovered an outfall consisting of a slotted four-inch pipe. The source of the mystery oil seep in the ditch is presumably an unpermitted drain field in the embankment for the OWS system which was installed during the PM facility upgrades between 1996 and 2002.

CE submitted soil and excavation water samples for laboratory analysis by an approved laboratory using approved methods for benzene, toluene, ethylbenzene and total xylenes (BTEX) and other volatile organic compounds (VOCs), polycyclic aromatic hydrocarbon (PAH), semi-volatile organic compounds (SVOCs), and GRO, DRO and RRO. In soil samples collected from two trenches in the upper operations area, benzene, trimethylbenzene (TMB), GRO and DRO were detected at concentrations above the respective Method Two (M2) Migration to Groundwater (MTG) cleanup levels. In soil

samples from the trench in the lower operations area DRO was detected above soil cleanup levels. Based on results, CE concluded that DRO and VOCs in soil were the contaminants of concern.
In accordance with a DEC-approved work plan in July 2012, DW pumped the tanks dry and permanently decommissioned the faulty OWS system in the upper operations area and ChemTrack Alaska (ChemTrack) advanced 13 Geoprobe borings to collect soil samples at varying depths in two locations around the facility. Workers advanced eight soil borings adjacent to the truck rack and five soil borings in the ditch below the embankment. Analytical sample data indicates that both sample areas had concentrations of DRO that exceed M2 MTG soil cleanup levels. Sample results also confirm that DRO is the only contaminant of concern in the sample areas as GRO, VOC and BTEX analytical results were below M2 MTG cleanup levels. The DRO contamination is stabilized in a distinct layer beginning approximately between three and five feet below ground surface (bgs). It does not exceed a depth of 14 feet bgs in the upper operations area, and eight feet bgs in the lower operations area.

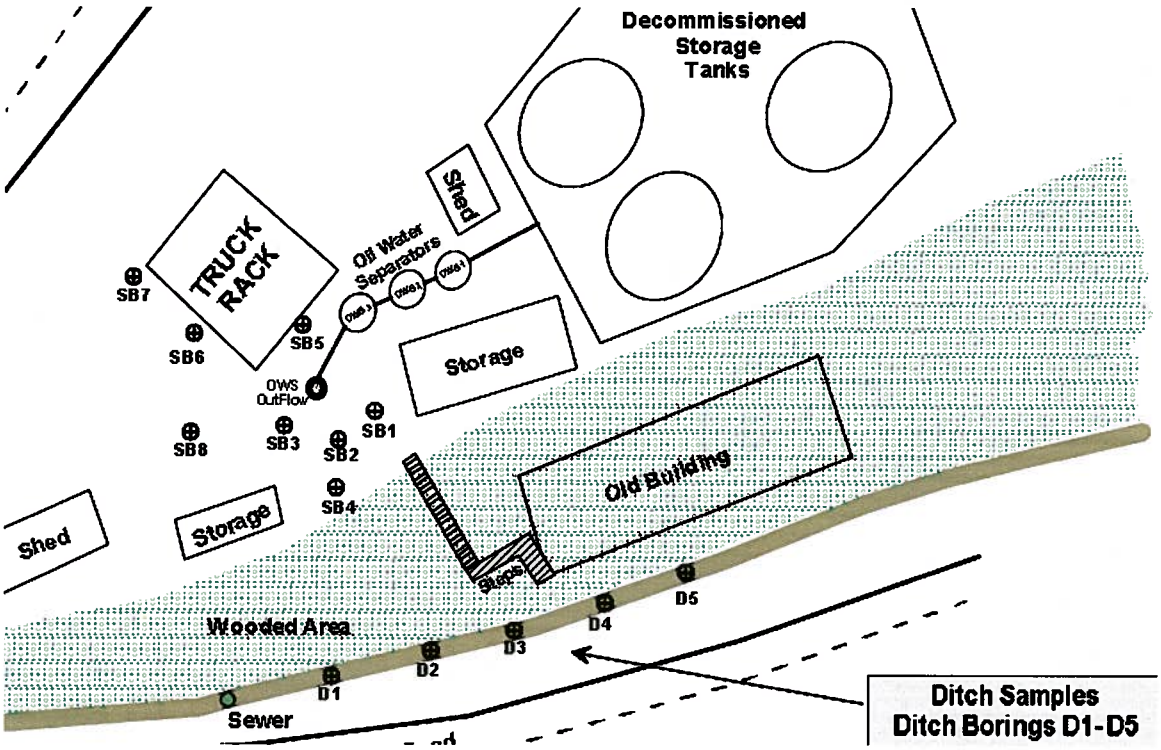

Figure 4. 2012 Soil boring locations to define the extent of subsurface contaminate soil.

ChemTrack concluded the soil boring results indicated that the fuel impacted soil is localized to a distinct layer under an average thickness of three feet of clean fill. This cap of clean fill above the impacted layer in both the Upper and Lower sampling areas, minimizes the risk of off-site migration. The OWS System that was identified as a likely source contributing to the contamination on site was decommissioned in July 2012. Therefore, any threat of continued contamination on site from that system has been removed.

While installing culverts in a Front Street reconstruction project in May 2013, workers for the Alaska Department of Transportation and Public Facilities (DOT) encountered oil sheen on water in the drainage ditch adjacent to the warehouse in lower operations area. The areas of excavation incidental to the culvert installations contained known contaminated soil according to ChemTrack's site

characterization performed in July 2012. On request from DEC, DW responded by having ChemTrack submit an Interim Removal Action (IRA) Plan to use field screen methods to identify and collect contaminated soil and water from two locations in the drainage ditch where culvert installation was planned -- the driveway to the warehouse loading dock and the roadway beneath Front Street. Based upon the ChemTrack 2012 Report, CS concluded that the site was already sufficiently characterized and approved the objective and methods in the IRA Plan.

DOT workers encountered a 6-inch diameter vertical steel casing located in the ditch that was slowly discharging water and causing the soil to become saturated. The water discharging from the steel casing under hydraulic pressure was observed to be free of petroleum indicators, but sheen was observed after the water came in contact with the soil in the ditch. Field measurements report that the casing depth was approximately 26-feet deep below top of casing (TOC) and was assumed to be an old water well.

The deep aquifer well standpipe was sealed with piping to divert the steady flow of water to the other side of the road. Still, most of the contaminated soil removed from the ditch for the warehouse dock culvert was saturated. To dewater the material for transport, the saturated material was placed in the dump trucks and bed raised with a trough under the back of the truck to catch the water dripping out of the truck. From the trough, the water was directed into a 55-gallon salvage drum. When the load stopped dripping water, the material was considered to be stable for transport. ChemTrack decanted excess water to a temporary settling pond. When sediment had settled out the water was pumped into a drum of granulated activated carbon (GAC) to filter out contamination. Workers transferred wet contaminated soil to a temporary containment built in the parking area on the west side of the facility. A volume of 50 cubic yards of soil was stockpiled and 5,500 gallons of water was treated and returned to the storm water drainage.

While excavating the roadway culvert a minimal amount of water and no soil contamination was encountered. Approximately 100 gallons of water was removed from the excavation and containerized into 55 gallon salvage drums and treated.

Figure 6. Front Street ditch at the warehouse; draining water from the contaminated soil into containers.

Based on field screening observations (i.e. visual staining, sheen, odor), clean soil was segregated from contaminated soil. A total of 6 field screen samples were collected and 2 samples were selected for laboratory analysis based on visual comparison of the sheen test results.

Approximately 50 cubic yards of contaminated soil was staged in the parking area of facility. After collecting waste characterization samples the contaminated soil was loaded into waste management bins and transported by Waste Management barge to a recycling facility in WA for disposal.

ChemTrack concluded that the contaminated area disturbed by the DOT road project was sufficiently capped and contained. The IRA activity served to flush out the disturbed non-aqueous phase liquid (NAPL). While there is groundwater movement, the water appears to be channeling through the clean overburden, not the contaminated zone. In addition the old well casing is relieving hydraulic pressure from below the contaminated soil.

SOIL

In summary, sampling to characterize remaining soil in the Front Street ditch adjacent to the lower operations area consisted of two samples collected from a test pit in 2011 and 15 samples collected from varying depths in five soil borings in 2012. The results for each analyte concentration in all these samples were below their respective Method Two (M2) Migration to Groundwater (MTG) cleanup levels except for DRO. A large portion of the contaminated soil was removed from the site and remediated in 2013.

Sampling to characterize the upper operations area consisted of four samples collected from two trenches in 2011 and 24 samples collected from three depths in each of eight borings between the truck rack and the OWS in 2012. Only a few of the samples had analyte concentrations above their respective M2 MTG cleanup levels and since they are the highest levels detected in remaining soil at the site, each are displayed in the Table 2 along with the name and the depth below the surface that each sample was taken, and the M2 MTG and Direct Contact/Ingestion and Inhalation soil cleanup levels listed in 18 AAC 75.341 Table B1 and Table B2 that are applicable to this site. The levels in bold are above the M2 MTG cleanup levels and apply for the soil contamination remaining at the site in order to protect the migration to surface water pathway by way of the groundwater zone.

Table 2. highest level of petroleum analytes detected in soil remaining at the site.

Hydrocarbon range/compounds of concern	Greatest level in mg/kg	Sample name and depth below the surface	M2 MTG Cleanup Levels mg/kg	Direct Contact/Ingestion Inhalation Cleanup Levels mg/kg
GRO	**340**	Sample C at 4.5 ft	260	1400
DRO	**5,100**	Sample B at 3.5 ft	230	8250
RRO	330	Sample B at 3.5 ft	9700	8300
Benzene	**0.17**	Sample A at 0.5 ft	0.025	8.5
Toluene	0.89	Sample A at 0.5 ft	6.5	220
Ethylbenzene	0.28	Sample D at 7 ft	6.9	81
Total Xylenes	25.6	Sample A at 0.5 ft	63	63
1,2,4 Trimethylbenzene	**35**	Sample C at 4.5 ft	23	37

GROUNDWATER AND SURFACE WATER

The referenced property is situated in a lowland area of the Chilkat River floodplain that has a fine glacial till (clay) layer that constitutes a confining layer separating shallow groundwater from deep groundwater. The deep groundwater aquifer below the confining layer has a peizometric pressure gradient and is of sufficient supply and quality to be a potential drinking water source. Shallow groundwater above the

confining layer appears intermittently depending on rainfall and snowmelt from the mountains north of the Haines. Due to the influence of surface water the shallow aquifer is not of sufficient quality for use as a drinking water source. During summer it is often not present for months at a time. In terms of local public drinking water supply, the Haines Borough provides drinking water to the area under a local public health ordinance that requires residents within 200 feet to make connection to the system.

In summary, although a clean, confined groundwater aquifer was measured at 24 feet bgs in a standpipe near Front Street, no groundwater was found to depths of 14 feet bgs in the upper operations area; therefore groundwater was not investigated for contamination. Analytical results for surface water samples collected while excavating contaminated soil from the trenches in 2011 found detectable levels of BTEX & PAH compounds. Although analyte concentrations were below Water Quality regulatory levels there was still detectable sheen on the surface. However, the subsequent IRA by ChemTrack and Delta Western in 2013 removed the contaminated soil from the ditch that was causing the sheen on surface water.

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, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2 as Attachment A to this letter.

Cumulative Health Risk Calculation
Pursuant to 18 AAC 75.325 (g), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be calculated. The risk from hazardous substances must not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and does not exceed a cumulative non-carcinogenic risk standard at a hazard index of one across all exposure pathways. A chemical that is detected at one-tenth or more of the Table B1 inhalation or ingestion values set out in 18 AAC 75.341(c) or the Table B2 values set out in 18 AAC 75.341(d) must be included when calculating cumulative risk under 18 AAC 75.325(g). Cumulative risk from petroleum contamination of environmental media at the site is addressed using the BTEX and PAH analyte concentration data. Based on a review of the environmental record, DEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

DEC Decision
Four interim removal actions of contaminated soil and two subsequent site investigations have demonstrated that residual petroleum contamination remaining at the site is in a discontinuous subsurface soil layer averaging between four and ten feet below the surface in the southeast quarter of the property in concentrations below human health based cleanup levels. An estimated volume of fifty cubic yards or less of the soil in this layer is in concentrations above migration to groundwater soil cleanup levels. This portion of the property is subject to institutional controls to ensure the contamination remains undisturbed unless a cleanup effort is initiated with prior approval from DEC. Since migration from soil in the shallow groundwater zone is minimal for lack of water, soil conditions are protective of off-site migration. Petroleum contaminated soil stockpiles have been transported off-site and remediated.

1) Any future change in land use may impact the exposure assumptions cited in this document. If the facility land use and/or ownership changes, the current ICs may not be protective of human health, safety and the environment. DEC may require additional site investigation, remediation and/or ICs. Therefore Delta Western shall report to DEC every three years to document land use remains unchanged, or report as soon as Delta Western becomes aware of any change in land ownership and/or use, if earlier. **The report can be sent to the local DEC office or electronically to DEC.ICUnit@alaska.gov.**

2) An estimated volume of fifty cubic yards or less of soil contamination remains in the subsurface between the truck rack and the oil water separator at the facility and as described and displayed in bold red in Figure 3 in this document.

3) Any proposal to transport soil or groundwater off-site requires DEC approval in accordance with 18 AAC 7.325(i). 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.

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

The DEC Contaminated Sites Database will be updated to reflect the change in site status as detailed above, and will include a description of the contamination remaining at the site. Institutional controls will be removed in the future if documentation can be provided that shows cleanup levels have been met. Management standard conditions 3-4 remain in effect after ICs are removed.

This determination is in accordance with 18 AAC 75.380(d) and does not preclude DEC 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.

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 closure decision, please contact me directly at (907) 465-5210.

Sincerely,

Bruce Wanstall

Bruce Wanstall
Remedial Project Manager
Environmental Program Specialist

Attachment A: Exposure Pathway Evaluation
Attachment B: Cleanup Complete-ICs Agreement and Signature page

Cc: Fred Gray, Delta Western Inc, via email
Julie Cozzi, Interim Borough Manager, Haines, via email : jcozzi@haines.ak.us
Sally Schlichting, State & Private Sites Unit Manager, via email
DEC SPAR Cost Recovery, via email: dec.spar.cr@alaska.gov

Attachment A: Exposure Pathway Evaluation

Table 1 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-minimis exposure	There is no surface soil contamination remaining at the site above the direct contact cleanup levels.
Sub-Surface Soil Contact	De-minimis exposure	Contamination remains in the subsurface between migration to groundwater and human health direct contact cleanup levels.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination remains in the subsurface below soil inhalation screening levels
Inhalation – Indoor Air (vapor intrusion)	De minimis exposure	Buildings present are greater than 30 feet from known soil contamination and the volatile compounds in the contaminated soil are below the soil inhalation screening levels.
Groundwater Ingestion	De minimis exposure	Groundwater at the site is intermittent, is not potable and was not investigated for contamination.
Surface Water Ingestion	Pathway Incomplete	Surface water hydraulically connected to the site is not of sufficient quality or quantity for a potable water source.
Wild Foods Ingestion	Pathway Incomplete	Portage Cove has potential for recreational use and harvest activity. Any off-site migrations of petroleum will not bioaccumulate in terrestrial or aquatic species.
Exposure to Ecological Receptors	Pathway Incomplete	There are no significant terrestrial or aquatic exposure routes present at the site.

Notes to Table 1: "De-minimis exposure" means that in DEC's judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. "Pathway incomplete" means that in DEC's judgment contamination has no potential to contact receptors. "Exposure controlled" means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

Attachment A: Cleanup Complete-ICs Agreement and Signature page

Delta Western agrees to the terms of this Cleanup Complete with ICs determination as stated in this Closure Decision Document dated January 30, 2014 for the Delta Western Tank Farm Haines contaminated site. Failure to comply with the terms of this agreement may result in DEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.80(d).

_____

Signature of Authorized Representative, Title
Bev Niemann, Environmental Coordinator
Responsible Party: Delta Western Inc.

_____

Printed Name of Authorized Representative, Title
Bev Niemann, Environmental Coordinator
Responsible Party: Delta Western Inc.

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the DEC project manager at the address on this correspondence within 30 days of receipt of this letter.