THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 2540.38.019

Return Receipt Requested
Article No.: 7016 2070 0000 6898 7704

January 3, 2017

Margaret L. deGravelle
Icicle Seafoods, Inc.
4019 21st Avenue West
Seattle, WA 98199

Re: Decision Document: Icicle Seafoods Wood River Facility - Dillingham
Cleanup Complete Determination
Hazard ID: 26115

Dear Ms. deGravelle:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Icicle Seafoods Wood River Facility site, located in Dillingham, 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 unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the Icicle Seafoods Wood River Facility - Dillingham site, which is located in the ADEC office in Anchorage, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:
Icicle Seafoods Wood River Facility
3700 Yako Road
Dillingham, AK

Name and Mailing Address of Contact Party:
Margaret L. deGravelle
Icicle Seafoods, Inc.
4019 21st Avenue West
Seattle, WA 98199

DEC Site Identifiers:
File No: 2540.38.019
Hazard ID: 26115

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background
In May of 2013, there was a release of approximately 150 gallons of diesel fuel from an aboveground heating oil tank, next to bunkhouse #1, at the Icicle Seafood Wood River Facility in Dillingham. This site is co-located with another site known as the Former Snopac Seafood Processing Facility with ADEC file #2540.38.018

Contaminants of Concern
During the course of the investigations at this site, soil and groundwater samples were analyzed for gasoline range organics (GRO), diesel range organics (DRO), volatile organic compounds (VOCs), benzene, toluene, ethylbenzene and xylenes (BTEX) and polycyclic aromatic hydrocarbons (PAHs). Based on these analyses, the following contaminants of concern were identified in soil and groundwater:

- Diesel Range Organics (DRO)

Cleanup Levels

Groundwater cleanup levels for this site are established in 18 AAC 75.345, Table C

Contaminant	*Site Cleanup Level*
• DRO	1.5 mg/L

Soil cleanup levels for this site are established in 18 AAC 75.341, Tables B1 and B2

Contaminant	*Ingestion*	*Inhalation*	*Migration to Groundwater*	*Maximum Allowable*
• DRO	10,250 mg/kg	12,500 mg/kg	250 mg/kg	12,500 mg/kg

Characterization and Cleanup Activities
In June 2013 a Release Investigation and limited removal action was conducted by Shannon & Wilson. Approximately 10 cubic yards (cy) of diesel impacted soils were excavated, placed in 1 cy plastic lined totes and disposed of at the Dillingham landfill. Samples were collected and analyzed for GRO, DRO, BTEX and PAHs. Confirmation samples of the excavation limits contained GRO and DRO above ADEC Method two cleanup levels. A plastic sheet was placed into the excavation prior to backfilling the excavation to segregate the excavation from the clean fill material.

In August 2015, Shannon & Wilson returned to the site to conduct additional soil excavation, monitoring well installation and additional site characterization. Approximately 21 cy of contaminated soil was removed from a second excavation and placed in 1 cy plastic lined boxes. 15 soil samples were collected from the base and sidewalls of the excavation and four groundwater monitoring wells were installed and sampled. The samples were analyzed for GRO, DRO and BTEX. All of the samples collected from the excavation base and sidewalls were below ADEC Method 2 cleanup levels. Soil impacted with DRO at 507 mg/kg; measured in 2013 at a concentration greater than the most stringent ADEC cleanup level may remain along the northeast edge of Excavation 1 under the southwest edge of Bunkhouse #1. Due to the presence of Bunkhouse #1, the DRO-impacted soil could not be excavated. One of the groundwater samples collected from monitoring well 1 (MW1) exceeded ADEC Table C cleanup level for DRO at a concentration of 1.52 mg/L. It was noted that the duplicate sample for MW1 contained a DRO concentration of 1.31 mg/L. The rest of the groundwater samples were below ADEC Table C cleanup levels.

In August 2016, the four groundwater monitoring wells, MW1 – MW4, were sampled for DRO. The monitoring well MW1 was sampled in duplicate and all results were below ADEC cleanup levels.

Soil contamination remains on site, however sufficient site characterization has been completed and the Contaminated Sites Program has determined that contaminants in soil have achieved steady-state equilibrium and will not migrate to groundwater.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), when detectable contamination remains on-site 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 non-carcinogenic risk standard at a hazard index of one across all exposure pathways.

Cumulative risk at this site was calculated assuming a residential land use and using the most recently detected concentrations of contaminants in all of the soil and groundwater samples collected.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations meet the human health cumulative risk criteria for residential land use.

Exposure 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 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimus Exposure	Contaminated surface soil was removed and the remaining DRO contamination is below direct contact cleanup levels
Sub-Surface Soil Contact	De-Minimus Exposure	Contamination is not present above direct contact cleanup levels in the sub-surface soil 2-15 feet below ground surface
Inhalation – Outdoor Air	De-Minimus Exposure	Contaminant concentrations in soil are below inhalation cleanup levels
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Volatile contaminants capable of causing risk via this pathway are not present above cleanup levels at the site
Groundwater Ingestion	Pathway Incomplete	Contamination is no longer detected above cleanup levels in groundwater samples collected at the site
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the site. Surface water is not believed to have been impacted by this 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	Ecological receptors are not likely to come into contact with contamination remaining at the site

Notes to Table 2: "De-Minimis Exposure" means that in ADEC's judgment receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination. "Pathway Incomplete" means that in ADEC's judgment, contamination has no potential to contact receptors.

ADEC Decision

Soil and groundwater contamination at the site have been cleaned up to concentrations below the approved cleanup levels suitable for residential land use. This site will receive a "Cleanup Complete" designation on the Contaminated Sites Database, subject to the following standard conditions.

Standard Conditions

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 75.325(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.

2. 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 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to 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 99811-1800, 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 99811-1800, 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 feel free to contact me at (907) 269-3059, or email at darren.mulkey@alaska.gov.

Sincerely,

Darren Mulkey
Project Manager