



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

555 Cordova Street
Anchorage, AK 99501
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www.dec.alaska.gov

File: 2100.38.384

June 28, 2019

EEB Limited
Attn: Mr. Bill Fraser
400 112th Avenue NE Suite 230
Bellevue, WA 98004

Re: **Decision Document: Norgetown Laundry & Cleaner
Cleanup Complete Determination – Institutional Controls**

Dear Mr. Fraser:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Norgetown Laundry & Cleaner contaminated site in Anchorage, 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 as long as the institutional controls are maintained and effective and no new information becomes available that indicates residual contamination poses an unacceptable risk.

This Cleanup Complete with Institutional Controls (ICs) determination is based on the administrative record for the Site Name which is located in the offices of the ADEC in Anchorage, Alaska. This decision letter summarizes the site history, cleanup actions, regulatory decisions, and specific conditions required to effectively manage remaining contamination at this site.

Site Name and Location:

Norgetown Laundry & Cleaner
5477 E Northern Lights Blvd
Anchorage, AK, 99508

Name and Mailing Address of Contact Party:

Mr. Bill Fraser
EEB Limited
400 112th Ave NE Suite 230
Bellevue, WA, 98004

ADEC Site Identifiers:

File No.: 2100.38.384
Hazard ID.: 422

Regulatory Authority for Determination:

18 AAC 75

Site Description and Background

The Norgetown Laundry & Cleaner reportedly operated as a drycleaner and discharged spent solvent to the Anchorage Wastewater and Utility (AWWU) sewer line from approximately 1972 until 1984. Tetrachlorethylene (PCE) contamination in groundwater was first identified in this area during a 1987 site assessment by the Alaska Department of Transportation and Public Facilities (ADOT&PF) during improvement work in the right of way downgradient of the laundry. In 1988 a Resource Conservation and Recovery Act (RCRA) inspection report for the Norgetown drycleaner and a site investigation for the nearby Mapco fuel station located at 5497 E Northern Light Blvd were completed. Nine groundwater monitoring wells named MW-7 through MW-15 were installed and sampled, which contained trichloroethylene (TCE), tetrachloroethylene (PCE), and methylene chloride at concentrations above the groundwater cleanup levels. In addition 22 soil borings were advanced in four locations surrounding the dry cleaner and fuel station. Fourteen analytical soil samples were collected and contained concentrations of benzene, ethylbenzene, methylene chloride, PCE, carbon tetrachloride, and 1,4-dichlorobenzene above the soil cleanup levels. Groundwater was encountered from 19 to 20 feet below ground surface (bgs). To further identify the source of chlorinated solvent contamination, water and sludge samples were also collected from the AWWU sewer lines. These samples contained significant concentrations of PCE, TCE, and cis-1,2-dichloroethylene (cDCE).

The property is zoned commercial, with the current day to day operations of the former drycleaning building consisting of a clothing store. Drinking water is currently provided in this area through the Anchorage Water & Wastewater Utility (AWWU). Groundwater has been observed to flow to the southwest.

Contaminants of Concern

During the course of site characterization and cleanup activities at this site, samples were collected from soil, groundwater, soil gas, and indoor air and analyzed for chlorinated solvent constituents. Based on these analyses, the following contaminants were detected above the applicable cleanup, or target levels and are considered Contaminants of Concern at this site:

- PCE
- TCE
- cDCE
- Chloroform
- Vinyl Chloride (VC)
- Methylene Chloride
- Benzene
- Ethylbenzene
- Carbon Tetrachloride
- 1,4-Dichlorobenzene

Cleanup Levels

The Method 2 soil cleanup levels for this site are established in 18 AAC 75.341(c), Tables B1 for the migration to groundwater pathway. Groundwater cleanup levels are established in 18 AAC 75.345 Table C.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)	Groundwater (µg/L)
PCE	0.19	41
TCE	0.011	2.8
cDCE	0.12	36
Chloroform	0.0071	2.2
VC	0.00080	0.19
Benzene	0.022	4.6
Methylene Chloride	0.33	110
Ethylbenzene	0.13	15
Carbon Tetrachloride	0.021	4.6
1,4, Dichlorobenzene	0.037	4.8

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

Characterization and Cleanup Activities

In 1990 a preliminary assessment was completed. A total of six wells were sampled including three monitoring wells from the Mapco fuel station property to the south, two private wells from nearby residences to the north and west, and one private commercial well southwest of the site. Groundwater samples contained concentrations of chloroform above groundwater cleanup levels in one upgradient residential well, and benzene, PCE, and TCE above groundwater cleanup levels in two downgradient wells.

In 1992, a dye test and hydrostatic pressure test of the sewer line from the Norgetown drycleaner indicated that the line had several spots where leaking occurred. In that same year two soil borings were placed in close proximity to the sewer line, to assess possible areas of contamination resulting from leakage from the line, and one boring was placed near the south perimeter of the dry cleaner to evaluate the extent of contamination. Borings were drilled down to 24 to 27 feet bgs, with soil samples collected at 2.5 foot intervals. Following the soil boring a disposable polyethylene bailer was then lowered into the borehole to retrieve a groundwater sample from the bottom of each boring. Groundwater was encountered at 12 feet bgs. The soil samples collected from a depth of 7.5 to 9.0 feet in each boring contained PCE above soil cleanup levels. One groundwater grab sample contained PCE exceeding groundwater cleanup levels.

In addition, groundwater was also monitored at the Mapco fuel station in 1992. Groundwater samples were collected from wells MW-7, MW-9 and MW-10 and contained both PCE and TCE above groundwater cleanup levels.

In 1993 investigation along the Boniface Parkway and at the Northern Lights Boulevard intersection (see attached figure) was completed to evaluate the potential of encountering contamination during construction activities. This work included 105 soil borings and the installation of 10 monitoring wells. A total of 191 subsurface soil samples were submitted for analytical testing. In addition groundwater samples were collected from the 20 monitoring wells in the area. Depth to groundwater ranged from 11 to 30 feet bgs, and generally flowed in a southwest direction. Soil samples contained PCE and TCE above the soil cleanup levels between the Northern Lights Boulevard and East 26th Avenue. Groundwater samples contained petroleum constituents and chlorinated solvents above groundwater cleanup levels.

In 1997, 42 permanent soil gas probes were installed surrounding the laundry to aid in determining locations for additional soil borings and monitoring wells. PCE was present in soil gas throughout the area, but was at highest concentrations immediately surrounding the laundry. Subsequently in 1998, 47 soil samples were collected from nine soil borings drilled surrounding the laundry. PCE was detected in 43 out of 47 samples above soil cleanup levels. Three of the nine soil borings were completed as monitoring wells and sampled in addition to the 11 wells installed in 1993, from which 15 groundwater samples were collected. PCE, TCE, DCE, and chloroform were detected in groundwater samples at concentrations above groundwater cleanup levels.

In 1999 and 2000, several site specific investigations were conducted to determine the exact source of the contamination. Thirteen of the fourteen groundwater monitoring wells were sampled which contained PCE, TCE, cDCE, and chloroform above groundwater cleanup levels. In addition the sewer line between the drycleaner building and the mall to the west was evaluated as a potential source of contamination. During this evaluation it was apparent that the 4-inch, 140-foot long pipe had leaked through its joints when subgrade soil samples from below the joints indicated high concentrations of PCE. Sludge and soil samples from inside the pipe indicated that PCE had been disposed of through the sewer pipe. Additionally an abandoned 6-inch sewer pipe was found north of the drycleaner building during this evaluation. This pipe was 43 feet long, capped at the end, and contained sludge with high concentrations of PCE. Subgrade soils below this section of the pipe indicated leakage of PCE through that pipe as well. Both the 4-inch and the 6-inch pipes were removed, and disposed of at a hazardous waste landfill, and the 4-inch pipe was replaced. Following the pipe replacement and groundwater monitoring a routine groundwater monitoring plan was established. In addition, a C-Sparger System was installed in 2000 around the drycleaner building where sewer lines were found to be leaking. The system consisted of 16 ozone sparge wells, eight of which were configured as recirculating wells with an internal pump that disperses ozonated and aerated water further into the aquifer than a sparge well alone. The system was designed to remediate solvents in the groundwater and ran seasonally from June to October until it was permanently shut off in 2002.

In 2003, following bioremediation soil testing, a total of 110 gallons of food grade molasses was injected through eight air sparging/recirculation wells, to approximately 16 feet bgs, during two events in September and October. Groundwater monitoring data was collected and contaminant concentrations had decreased, leading to an additional two injections in July and October 2005.

Between 2000 and 2012 groundwater was sampled annually in accordance with the routine groundwater monitoring plan. Samples indicated elevated but decreasing levels of PCE, TCE, cDCE, and VC, in addition to detectable concentrations of chloroform below ADEC cleanup levels.

Routine groundwater monitoring stopped in 2012 and was not conducted again until 2015 when the ADEC requested an additional groundwater monitoring event, as well as an indoor air evaluation. During the 2015 groundwater sampling event, eight groundwater monitoring wells were sampled. Samples contained detectable concentrations of PCE and cDCE, however all contaminant concentrations were below groundwater cleanup levels. All remaining groundwater monitoring wells were decommissioned in 2018.

The building's indoor air pathway was evaluated in 2015. Indoor air samples were collected from the north and south restrooms, stockroom, and showroom. PCE was detected above the ADEC indoor air target levels in several locations with the highest concentrations reported from the stockroom.

Indoor air sampling was conducted again in March 2017. PCE was the only analyte detected with concentrations above ADEC target levels for indoor air in the storage room. To mitigate indoor air risk, ventilation fans were added in August 2017 in the storage room area and the concrete floor was treated with an epoxy sealant. An additional sampling event was then conducted which collected five indoor air samples in October 2017. PCE and TCE were detected in all five samples at concentrations up to 100 µg/m³ and 7.9 µg/m³, respectively, above the ADEC indoor air target levels for residential use. Although PCE was significantly lower than in 2015, the TCE was at the highest concentration observed. The source of the TCE contamination is unclear and may be associated with the solvent releases or may be associated with sources inside the building. ADEC consulted with the Alaska Department of Health and Human Services (AK HSS) regarding levels for commercial use and AK HSS calculated time adjusted minimal risk levels (MRLs) of 172 µg/m³ for PCE and 9 µg/m³ for TCE. The AK HSS based these MRLs on the assumed occupational setting of eight hours a day five days a week and provided recommendations in their April 3, 2019 letter, which includes precautions for pregnant women or women who may become pregnant that are exposed to TCE.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), when 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 noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations meet the cumulative risk criteria for human health, however please note that the risk from exposure via the vapor intrusion pathway is not included in the cumulative risk calculation.

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, Exposure Controlled, 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	Pathway Incomplete	Contamination is not present in surface soil (0 to 2 feet below ground surface).
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination remains in the sub-surface, but is below human health cleanup levels.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination remains in the sub-surface, but is below human health cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Indoor air data collected from inside the building are below the AK HSS adjusted indoor air target levels. To further mitigate the risk, the floor was epoxied and a fan was installed in the area with the highest concentrations.

Groundwater Ingestion	De-Minimis Exposure	Contamination remains in groundwater, but is below Table C groundwater cleanup levels.
Surface Water Ingestion	Pathway Incomplete	Surface water is not used as a drinking water source in the vicinity of the 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	Contaminants of concern are an industrial area where ecological receptors are not expected to be present.

Notes to Table 2: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be 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. “Exposure Controlled” means there is an institutional control in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

ADEC Decision

PCE contamination remains in sub-surface soil above levels suitable for unrestricted future use; however ADEC has approved the use of institutional controls to limit potential future exposure and risk to human health or the environment. A Notice of Environmental Contamination and Institutional Controls (NEC-IC) has been recorded in the land records maintained by the Alaska Department of Natural Resources.

Groundwater meets the applicable cleanup levels at the compliance points/monitoring wells shown in the figure included in the attached NEC-IC Agreement, the groundwater contaminant plume has been demonstrated to be shrinking and the contaminant concentrations are decreasing. Therefore, ADEC has determined the residual soil contamination does not pose an unacceptable migration to groundwater concern.

Due to the elevated TCE levels in the August 2017 indoor air samples, DEC recommends continued indoor air sampling to monitor occupational exposures.

Institutional controls necessary to support this closure determination include:

1. The Landowner agrees to notify ADEC prior to any sale or transfer of the property and shall report to ADEC every 3 years to document the status of compliance with the institutional controls described in this notice. Such notice and the reports should be sent to the ADEC at:
Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
Attention: IC Unit
P.O. Box 111800
Juneau, AK 99811-1800
or be submitted electronically to CS.Submittals@alaska.gov.
2. If the property is proposed for residential use, child day care, educational facilities, playgrounds or similar facilities DEC must be contacted in advance to ensure protectiveness.
3. Employees in the former Norgetown Drycleaner building shall be informed of the contamination levels and exposure risk, including risk to women who are pregnant or may become pregnant. A

- copy of the "Notice to Employees" (see attached notice), shall be provided at no cost to the employee. In addition the Notice shall be posted, maintained, and available to employees where other state or Occupational Safety and Health Administration (OSHA) required signage is posted.
4. If the use of the building changes, or if other buildings are constructed within the contaminated area, ADEC must be notified and may require a vapor intrusion evaluation to determine if building occupants could be affected by vapors.
 5. Soil or groundwater affected by solvent wastes associated with the Norgetown Drycleaner is F-listed waste under the Resource Conservation and Recovery Act (RCRA) and must be disposed of in accordance with RCRA requirements.
 6. ADEC must be notified in advance of the subdivision or replat of the property associated with these institutional controls. This recorded Notice of Environmental Contamination must be included as part of future property transactions and attached to subsequent associated parcels.

Standard site closure conditions that apply to all sites include:

1. ADEC approval is required prior to moving any soil or groundwater off any site that is subject to the site cleanup rules (see 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. In the future, if soil will be excavated, or groundwater will be brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time and ADEC approval must be obtained before moving contaminated soil or water off the property (see Figure 1).
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional characterization and treatment may be required to ensure the water is suitable for its intended use.

ADEC has determined the cleanup is complete as long as the institutional controls are properly implemented and no new information becomes available that indicates residual contamination may pose an unacceptable risk.

The ADEC Contaminated Sites Database will be updated to reflect the change in site status to "Cleanup Complete with Institutional Controls" and will include a description of the contamination remaining at the site.

The institutional controls will be removed in the future if documentation is provided that shows concentrations of all residual hazardous substances remaining at the site are below the levels that allow for unrestricted exposure to, and use of, the contaminated media and that the site does not pose a potential unacceptable risk to human health, safety or welfare, or to the environment. Standard conditions 9-11 above will remain in effect after ICs are removed.

This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring

additional assessment and/or cleanup action if the institutional controls are determined to be ineffective or if new information indicates that contaminants at 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, 555 Cordova Street, Anchorage, Alaska 99501-2617, within 20 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, P.O. Box 111800, 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) 269-7522 or email at Chelsy.Passmore@alaska.gov.

Sincerely,



Chelsy Passmore
Project Manager

Note: This letter is being transmitted to you in electronic format only. If you require a paper copy, let us know and we will be happy to provide one to you. In the interest of reducing file space, the Division of SPAR/Contaminated Sites Program is transitioning to electronic transmission of project correspondence.

Enclosures: Recorded NEC-IC Agreement which includes site figure(s) showing the extent of residual soil/groundwater contamination, alternative points of compliance for groundwater, and boundaries of areas covered by ICs.

cc: Spill Prevention and Response, Cost Recovery Unit

Notice of Environmental Contamination and Institutional Controls

Grantor: State of Alaska
Department of Environmental Conservation
Contaminated Site Program

Grantee: EEB Limited
5477 East Northern Lights Blvd

Legal Description: Township 13 North, Range 3 West, Section 22, Tract A, Seward Meridian
MOA Parcel #00632240

Recording District: Anchorage

Return to: Chelsy Passmore
555 Cordova St, Anchorage, AK, 99501

State Business- No Charge

NOTICE OF ENVIRONMENTAL CONTAMINATION AND INSTITUTIONAL CONTROLS

As required by the Alaska Department of Environmental Conservation (ADEC), pursuant to 18 AAC 75.375 EEB Limited, the Landowner of the subject property, hereby provides public notice that the property located at: 5477 East Northern Lights Blvd, Anchorage, Alaska, 99508, and more particularly described as follows:

Township 13 North, Range 3 West, Section 22, Tract A, Seward Meridian

has been subject to a discharge or release and subsequent cleanup of oil or other hazardous substances, regulated under 18 AAC 75, Article 3. This release and cleanup are documented in the ADEC contaminated sites database at

<http://dec.alaska.gov/Applications/SPAP/Default.aspx?SP/Search>

under the site name Norgetown Laundry and Cleaner and Hazard ID number 422.

By signing this notice, ADEC and the Landowner have agreed that the institutional controls described below are necessary and appropriate, and shall be maintained and be binding on the Landowner and its agents, successors and assigns. If the Landowner transfers, sells, assigns, leases or subleases the property or any portion of the property covered by the institutional controls, the Landowner shall incorporate a copy of this notice into the documents of transfer, sale, assignment, lease or sublease.

ADEC has reviewed and approved, subject to the institutional controls described below, the cleanup as protective of human health, safety, welfare, and the environment. No further cleanup is necessary at this site as long as the institutional controls remain in place and effective and no new information becomes available that indicates to ADEC that the site may pose an unacceptable risk to human health, safety, welfare, or the environment.

ADEC determined, in accordance with 18 AAC 75.325 – .390 site cleanup rules, that cleanup has been performed to the maximum extent practicable even though residual contamination in soil exists on-site. Further cleanup was determined to be impracticable and institutional controls will prevent exposure.

The following institutional controls and standard conditions shall be maintained:

1. The Landowner agrees to notify ADEC prior to any sale or transfer of the property and shall report to ADEC every 3 years to document the status of compliance with the institutional controls described in this notice. Such notice and the reports should be sent to the ADEC at:

Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
Attention: IC Unit
P.O. Box 111800
Juneau, AK 99811-1800

- or be submitted electronically to CS.Submittals@alaska.gov.
2. If the property is proposed for residential use, child day care, educational facilities, playgrounds or similar facilities ADEC must be contacted in advance to ensure protectiveness.
 3. Employees in the former Norgetown Drycleaner building shall be informed of the contamination levels and exposure risk, including risk to women who are pregnant or may become pregnant. A copy of the "Notice to Employees" (see attached Notice), shall be provided at no cost to the employee. In addition the Notice shall be posted, maintained, and available to employees where other state or Occupational Safety and Health Administration (OSHA) required signage is posted.
 4. If the use of the building changes, or if other buildings are constructed within the contaminated area, ADEC must be notified and may require a vapor intrusion evaluation to determine if building occupants could be affected by vapors.
 5. Soil or groundwater affected by solvent wastes associated with the Norgetown Drycleaner is F-listed waste under the Resource Conservation and Recovery Act (RCRA) and must be disposed of in accordance with RCRA requirements.
 6. ADEC must be notified in advance of the subdivision or replat of the property associated with these institutional controls. This recorded Notice of Environmental Contamination must be included as part of future property transactions and attached to subsequent associated parcels.

Standard site closure conditions that apply to all sites include:

1. ADEC approval is required prior to moving any soil or groundwater off any site that is subject to the site cleanup rules (see 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. In the future, if soil will be excavated, or groundwater will be brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time and ADEC approval must be obtained before moving contaminated soil or water off the property (see Figure 1).
2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional characterization and treatment may be required to ensure the water is suitable for its intended use.

Attached is a site diagram drawn to scale that shows the locations of existing structures, and the approximate location and extent of remaining soil contamination which is subject to the institutional controls described in this notice.

Failure to comply with the institutional controls described herein may result in ADEC reopening the site and requiring additional site characterization and cleanup.

In the event that new information becomes available which indicates that the site may pose an unacceptable risk to human health, safety, welfare or the environment, further site characterization and cleanup may be necessary under 18 AAC 75.325-.390

This notice and the institutional controls remain in effect until a written determination from ADEC is recorded that documents contaminants remaining at the site have been shown to meet the residential use soil cleanup levels defined in 18 AAC 75.340 and groundwater cleanup levels in Table C within 18 AAC 75.345.

For more information on the contaminated site in this notice, please see ADEC Contaminated Sites Program file number 2100.38.384 for the site named Norgetown Laundry & Cleaner.

William H. Fraser
Signature of Landowner

June 30, 2019
Date

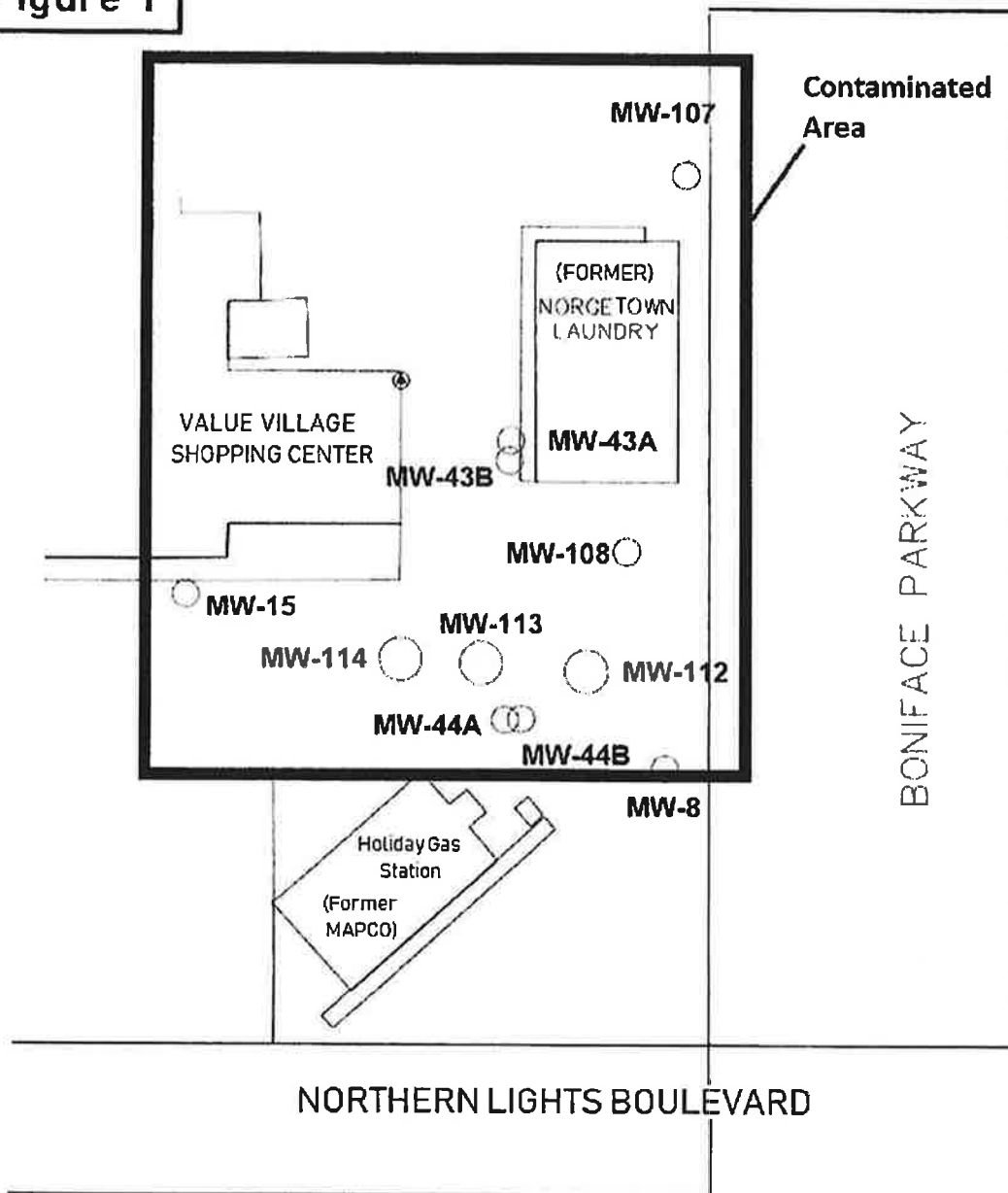
EEB Limited
By William H. Fraser,
Printed Name of Landowner Vice President

Chelsy M. Passmore
Signature of Authorized ADEC Representative

July 1, 2019
Date

Chelsy Passmore
Printed Name of Authorized ADEC Representative

Figure 1



EMPLOYEE NOTICE

Indoor air monitoring at this building have detected both tetrachloroethylene (PCE) and trichloroethylene (TCE) in indoor air which have exceeded the Minimal Risk Levels established by the U.S. Agency for Toxic Substances and Disease Registry. Evaluation by the Alaska Department of Health and Social Services, Division of Public Health have concluded:

"Results of our evaluation indicate that the measured air concentrations of PCE and TCE at Fashion City should not present a health risk to the general population. However, pregnant women and women who may become pregnant should consider working less than 8-hours per day, 5-days per week at Fashion City to minimize inhalation exposure to TCE (a known developmental toxicant)"