



Department of Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE Contaminated Sites Program

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File No: 2319.26.003

October 10, 2013

Paul Dale Snug Harbor Seafoods 27110 Taylor Street Kasilof, AK 99610

Re: Decision Document: Snug Harbor Seafoods Kasilof River Facility Corrective Action Complete Determination

Dear Mr. Dale;

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the referenced site. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

Introduction

Site Name and Location:

Snug Harbor Seafoods Kasilof River Facility 27110 Taylor Street Kasilof, AK 99610

DEC Site Identifiers

File: 2319.26.003 LUST Facility I.D. 1504 Hazard ID: 26119 Name and Mailing Address of Contact Party: Paul Dale 27110 Taylor Street Kasilof, AK 99610

Regulatory authority for determination: 18 AAC 78 and 18 AAC 75

Site Description and Background

In October 2012 a regulated underground storage tank (UST) system, including Tank #1 (10,000gallon gasoline) and Tank #2 (10,000-gallon diesel) was removed from the Snug Harbor Seafoods Kasilof River facility. The UST system was located in a two-acre clearing bordering the Kasilof River, at the end of an 11-acre tract (290' by approx. 1650'), 1-1/2 miles upstream from the river mouth at Cook Inlet. Results of post excavation confirmation samples detected the presence of toluene, ethylbenzene, and xylenes, all at levels below ADEC's most stringent cleanup levels.

Contaminants of Concern

No contaminants of concern (that is, contaminants detected above approved cleanup levels) were identified at the former UST location.

Because federal UST regulations require that any detectable contamination associated with a regulated UST be reported, the type and concentrations of detected contaminants are recorded and discussed below.

Seven soil samples were collected and analyzed for gasoline range organics (GRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX); five of the samples from areas associated with the diesel tank and piping were also sampled for diesel range organics (DRO). The BTEX compounds toluene, ethylbenzene and xylenes were detected in five samples at concentrations below ADEC's most stringent soil cleanup levels under 18 AAC 75.341, *Soil cleanup levels, tables.* Groundwater was not encountered during the investigation.

Characterization and Cleanup Activities

Two regulated 10,000-gallon USTs, one containing gasoline and one diesel, and associated piping and dispensers were removed and postclosure sampling conducted from September $18^{th} - 20^{th}$, 2012. (See photo, right, by Rozak Engineering). The USTs were installed and buried with portions of the tanks exposed in a single excavation in 1997 and were used to fuel watercraft at a dock in the Kasilof River.



NW view UST site, diesel tank at left, gas at right. Note fuel pipe above tanks. River is behind photographer.

The UST system removal and post-

closure sampling was reported to ADEC in a November 2012 report prepared by Rozak Engineering.¹ No indications of releases were observed during the system removal or sampling.

Soil samples were collected at seven locations for analytical testing. One field duplicate and one trip blank were also analyzed. All analytical samples were tested for GRO and BTEX and samples at the diesel tank and the two pipe locations were also analyzed for DRO. The BTEX compounds toluene, ethylbenzene and xylenes were detected in five samples at concentrations below ADEC's most stringent soil cleanup levels under 18 AAC 75.341, *Soil cleanup levels, tables.* All other analytical results were non-detect. Groundwater was not encountered during the investigation.

Cleanup Levels

The default soil cleanup levels for petroleum hydrocarbon contaminants in soil are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater. Soil samples collected by

¹ See Site Assessment Report for Permanent closure of UST Facility ID #1504, Snug Harbor Seafoods, Inc. Kasilof River Plant, Kenai, Alaska prepared by Rozak Engineering, dated November 30, 2012.

Rozak during the 2013 investigation were analyzed for DRO, GRO and BTEX. All results were below ADEC cleanup levels.

Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), 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 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 do not pose a cumulative human health risk.

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 1.

Pathway	Result	Explanation
Surface Soil Contact	Pathway	Contaminants were not detected in surface soil
	Incomplete	confirmation samples.
Sub-Surface Soil Contact	De minimis	Contaminants in sub-surface soil did not exceed
	exposure	applicable cleanup levels.
Inhalation – Outdoor Air	De minimis	Contaminants in soil did not exceed applicable
	exposure	cleanup levels; ethylbenzene was the only volatile
		compound detected.
Inhalation – Indoor Air	Pathway	Contaminants in soil did not exceed applicable
(vapor intrusion)	Incomplete	cleanup levels.
Groundwater Ingestion	Pathway	Groundwater was not encountered at the site and
	Incomplete	contaminant levels in soil did not exceed applicable
		cleanup levels.
Surface Water Ingestion	Pathway	Surface water is not impacted.
	Incomplete	
Wild Foods Ingestion	Pathway	Wild food ingestion pathway would not be adversely
	Incomplete	impacted as no contaminants were present at levels
		exceeding applicable cleanup levels.
Exposure to Ecological	Pathway	Ecological receptors would not be adversely
Receptors	Incomplete	impacted as no contaminants were present at levels
		exceeding applicable cleanup levels.

Table 1 – Exposure Pathway Evaluation

Notes to Table 1: "De minimis exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. "Pathway incomplete" means that in ADEC'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.

ADEC Decision

Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as closed on the Department's database.

Although a Corrective Action Complete determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 78.274(b). It should be noted that movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

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.

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 decision document, please contact the ADEC Project Manager, Eileen Olson at (907) 269-7527.

Sincerely,

Eileen Olson

Eileen Olson Environmental Program Specialist

cc: Ron Rozak, Rozak Engineering