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: 2616.38.004
Certified Mail Receipt: 7015 1730 0000 6827 5480

August 3, 2017

Aaron DeSalvo
Trident Seafoods Corporation
5303 Shilshole Avenue NW
Seattle, WA 98107

Re: Trident Seafoods- South Naknek Contaminated Site

Dear Mr. DeSalvo:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Trident Seafoods-South Naknek contaminated site located at 101 Cannery Road, South Naknek. 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 Trident Seafoods-South Naknek, 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:
Trident Seafoods-South Naknek
101 Cannery Road
South Naknek, AK 99633

Name and Mailing Address of Contact Party:
Aaron DeSalvo, Trident Seafoods Corporation
5303 Shilshole Avenue NW
Seattle, WA 98107

ADEC Site Identifiers:
File No.: 2616.38.004
Hazard ID.: 25924

Regulatory Authority for Determination:
18 AAC 75

Site Description and Background

In 2012, Trident Seafood became aware of eight above ground storage tanks southwest of the main cannery, between Cannery Road and the cliff that overlooks the river. The tanks were located partially on Trident property and partially on the adjacent property (see attached plat). The tanks were obscured by the brush and were not connected to any pipelines, dispenser, or other fuel systems. The tanks were resting directly on the ground and had some apparent leaks. In addition, the tops of some of the tanks were open and local residents had thrown trash and other debris inside. The tanks were partially full of a viscous fuel, likely

bunker C or #6 fuel oil. Interviews with the Trident on site management indicated that the tanks were historically used for power generation at the main cannery and relocated to the site approximately 40 years ago.

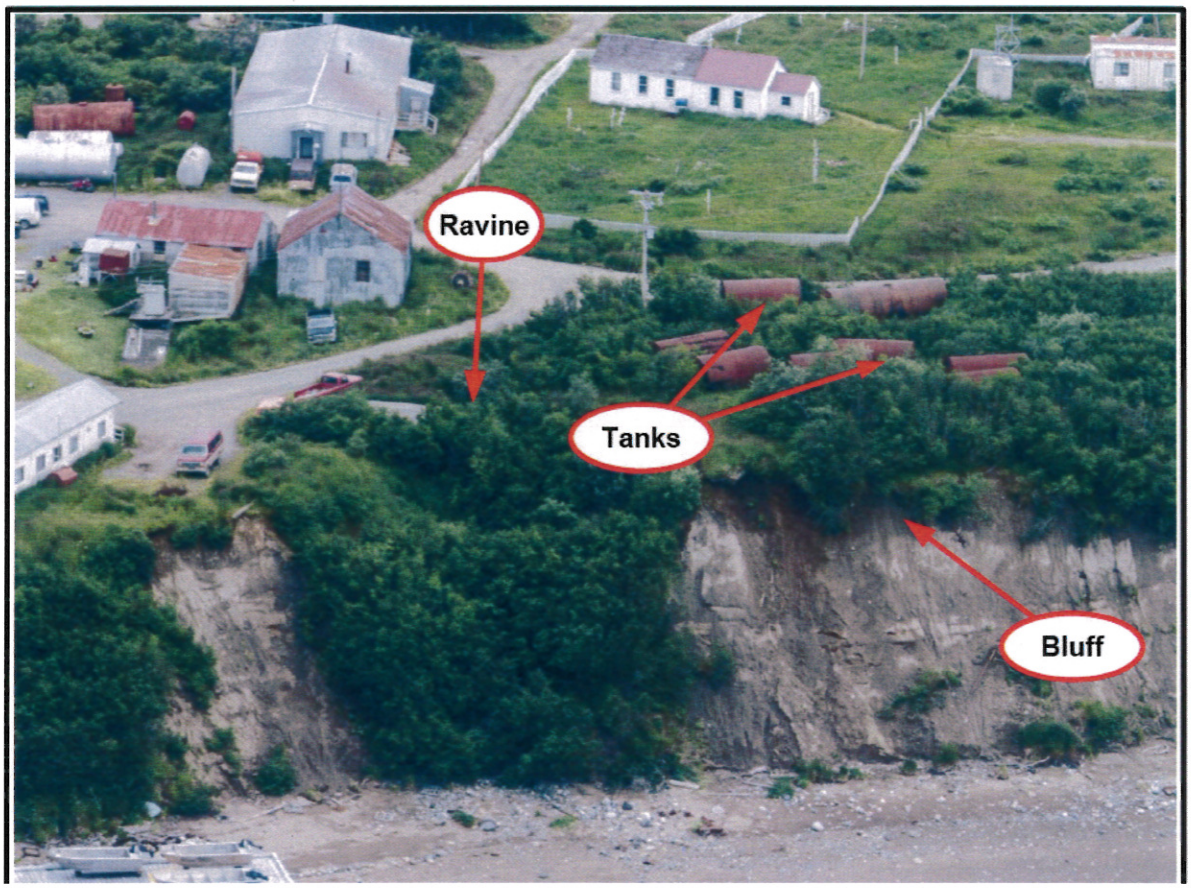


Figure 1.1- 2013 photograph of original layout of site. Tanks are located atop the bluff (G-logics 2014 Cleanup Action Report).

Figure 1.2- 2013 aerial photograph looking northeast of site after excavation, Super Sack filing, stockpile construction, and tank arrangement (G-logics 2014 Cleanup Action Report).

Contaminants of Concern

During site characterization and cleanup activities, surface soil and subsurface soil samples were collected and analyzed for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), BTEX (benzene, toluene, ethylbenzene, xylene), and polyaromatic hydrocarbons(PAH). Samples did not contain detectable levels of PAHs or BTEX. The fuel was analyzed for polychlorinated biphenyls (PCBs). PCBs were not detected in the fuel sample. Based on these analyses, DRO was detected above the applicable cleanup levels and is considered the only Contaminant of Concern at this site.

Cleanup Levels

The most stringent applicable cleanup level is the migration to groundwater cleanup level for the under 40 inch zone (18 AAC 75.314 9 (c) table B2). The residual contamination left in the ravine is present in the surface soil above migration to groundwater cleanup levels. The residual contamination is considered a de minimis volume, and therefore, does not pose an unacceptable migration to groundwater risk. It is below ADEC ingestion and inhalation cleanup levels (18 AAC 75.314 9 (c) table B2).

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
DRO	250

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 2012. A preliminary site assessment was conducted during summer 2012 to assess the potential environmental impacts, stabilize the tanks and stop any releases. Surface and subsurface soil samples were collected in areas of obvious staining and adjacent to the tanks in order to provide an initial assessment of contaminants on site. Site characterization and cleanup took place during July and August of 2014. The fuel was removed from the tanks, all the tanks were relocated to the Trident property (figure 1.2), and the visually contaminated soil was excavated. The tanks are currently located on Trident property as described in US Survey 2875 (see attached plat and figure 1.2). A total of 16,500 gallons of fuel was drummed and shipped off site for disposal. A total of 220 cubic yards of contaminated soil was excavated and removed, placed into Super Sacks, and shipped offsite for disposal. The excavated soil was in exceedance of method 2 B2 migration to groundwater cleanup levels for DRO. Sacks were shipped in multiple sailings according to barging availability. The volume of soil exceeded the anticipated Super Sack volume, as such 20 cubic yards of soil was placed into a stockpile within the excavation area and covered for the winter. Contaminated soil was found in the ravine to the north of the property; however, due to the geography it was not practicable to excavate (figure 1.1). In addition, contaminated soil was left in place next to the power pole cable anchor. In all other areas, the contaminated soil was excavated to below ADEC 18 AAC 75.341 (c) Table B2 migration to ground water cleanup levels.

A second characterization and cleanup effort was conducted in July 2016 to address all remaining data gaps. The remaining stockpile was placed into Super Sacks and shipped off site for disposal. The full extent of the contaminated soil encircling the power pole cable anchor was excavated with hand tools. Five cubic yards of soil was excavated from the cable anchor area, placed in Super Sacks, and shipped off site for disposal. The horizontal and vertical extent of the contamination in the ravine was delineated using a hand auger. The vertical extent of the contamination did not penetrate deeper than one foot below ground surface (bgs). The horizontal extent of the contamination was constrained to the upper portion of ravine. The maximum concentration of DRO and RRO left in the ravine were 1, 210mg/kg and 2, 060 mg/kg respectively. These values are above the 18 AAC 75.341 (c) Table B2 migration to ground water cleanup levels. Because the contaminated area is small and is restricted to the surface soil, ADEC considers the remaining contamination de minimis. In addition, remaining DRO and RRO are below ingestion and inhalation cleanup levels and does not pose a risk to human health.

Cumulative Risk Evaluation

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 either 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 minimis	Contamination in the surface soil is below most stringent ADEC cleanup levels, aside from in the ravine. Contamination remaining in the ravine is DRO and RRO and isolated to a small area considered de minimis.
Sub-Surface Soil Contact	De minimis	Contamination in the subsurface is below migration to groundwater cleanup levels.
Inhalation – Outdoor Air	Pathway incomplete	Contamination in the surface soil and sub-surface soil is below inhalation cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway incomplete	Contamination in the surface soil and sub-surface soil is below inhalation cleanup levels. Additionally, the closest on site building is 50 feet away.
Groundwater Ingestion	Pathway incomplete	Contamination left in the surface soil does not pose an unacceptable migration to groundwater risk.
Surface Water Ingestion	Pathway incomplete	Contamination left in the surface soil does not pose an unacceptable migration to surface water risk.
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	Contamination left in place is de minimis and 100 feet from the nearest surface water.

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 contamination at the site has 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. To date, the site is defined by the Trident parcel on US Survey 2875 and US Survey 1424 lot 17 (see attached plat).

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 testing and treatment may be required to ensure the water is suitable for its intended use.

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, 555 Cordova Street, Anchorage, Alaska 99501-2617, 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, PO 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) 269-7556 or email at erin.gleason@alaska.gov.

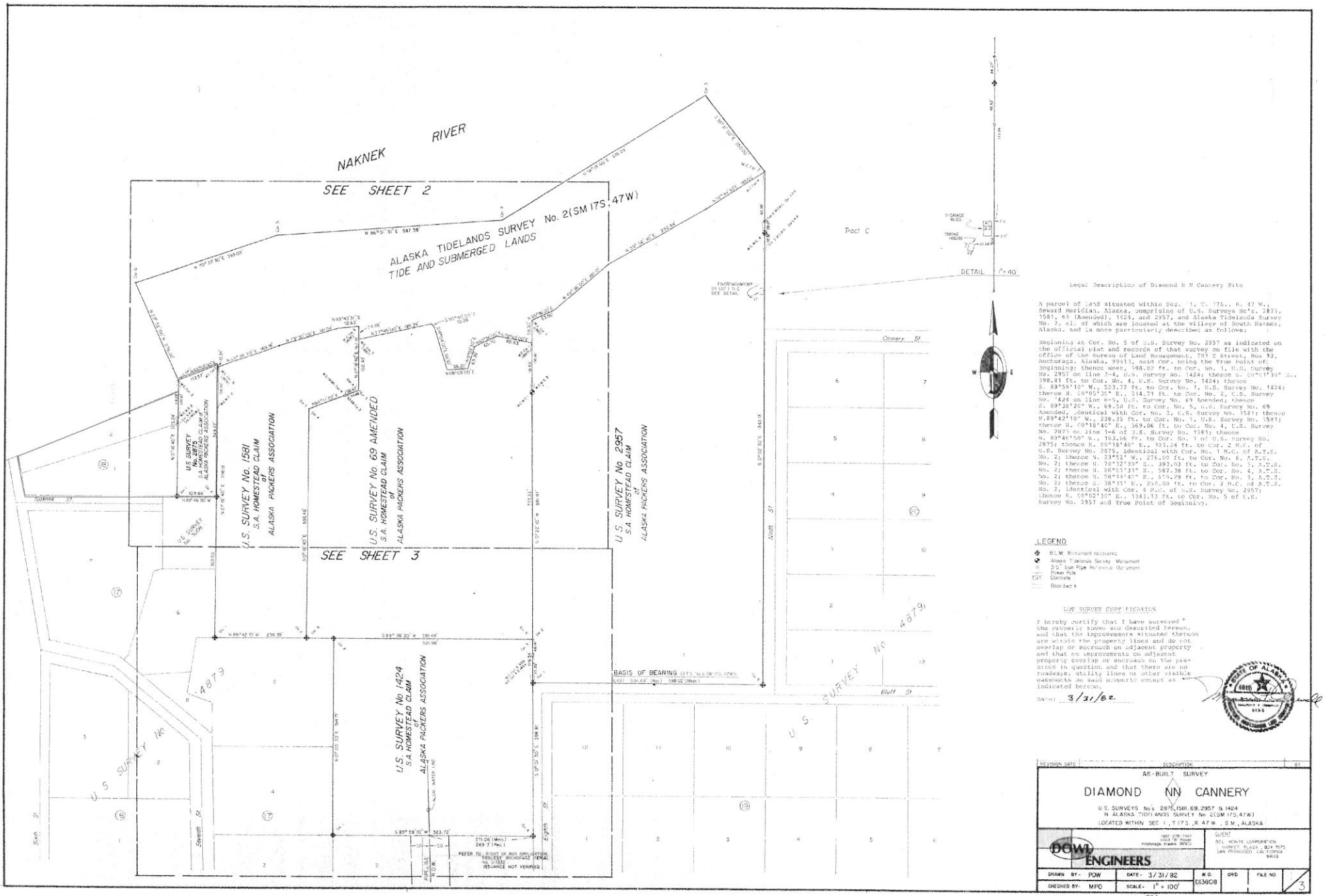
Sincerely,

Erin Gleason
Environmental Program Specialist

Enclosure: Diamond Cannery Plat

Cc (via email): Karis Vandehey, G-Logics, KarisV@g-logics.com
Rory Galloway, G-Logics, RoryG@g-logics.com

Cc: Mr. Mike Ongaro
HOH, Inc.
218 Main Street #562
Kirkland, WA 98033



Legal Description of Diamond N N Cannery Site

A parcel of land situated within Sec. 1, T. 17S., R. 47 W., Seward Meridian, Alaska, comprising of U.S. Surveys No's. 2875, 1581, 69 (Amended), 1424, and 2957, and Alaska Tidelands Survey No. 2, all of which are located at the village of South Naknek, Alaska, and is more particularly described as follows:

Beginning at Cor. No. 5 of U.S. Survey No. 2957 as indicated on the official plat and records of that survey on file with the office of the Bureau of Land Management, 701 C Street, Box 13, Anchorage, Alaska, 99513, said Cor. being the True Point of Beginning; thence west, 598.02 ft. to Cor. No. 1, U.S. Survey No. 2957 on line 3-4, U.S. Survey No. 1424; thence S. 00°01'30" E., 398.81 ft. to Cor. No. 4, U.S. Survey No. 1424; thence S. 89°59'10" W., 523.72 ft. to Cor. No. 1, U.S. Survey No. 1424; thence N. 00°05'30" E., 314.71 ft. to Cor. No. 2, U.S. Survey No. 1424 on line 6-5, U.S. Survey No. 69 (Amended); thence S. 89°38'26" W., 69.50 ft. to Cor. No. 5, U.S. Survey No. 69 (Amended), identical with Cor. No. 2, U.S. Survey No. 1581; thence N.89°42'10" W., 238.35 ft. to Cor. No. 1, U.S. Survey No. 1581; thence N. 00°18'40" E., 369.06 ft. to Cor. No. 4, U.S. Survey No. 2875 on line 1-6 of U.S. Survey No. 1581; thence N. 89°46'50" W., 163.66 ft. to Cor. No. 1 of U.S. Survey No. 2875; thence N. 00°18'40" E., 393.24 ft. to Cor. 2 M.C. of U.S. Survey No. 2875, identical with Cor. No. 1 M.C. of A.T.S. No. 2; thence N. 23°53' W., 276.00 ft. to Cor. No. 8, A.T.S. No. 2; thence N. 70°52'30" E., 393.03 ft. to Cor. No. 7, A.T.S. No. 2; thence N. 80°01'30" E., 587.38 ft. to Cor. No. 4, A.T.S. No. 2; thence N. 58°19'40" E., 554.29 ft. to Cor. No. 3, A.T.S. No. 2; thence S. 38°11' E., 240.80 ft. to Cor. 2 M.C. of A.T.S. No. 2, identical with Cor. 4 M.C. of U.S. Survey No. 2957; thence S. 00°02'30" E., 1343.13 ft. to Cor. No. 5 of U.S. Survey No. 2957 and True Point of Beginning.

LEGEND

- BLM Monument recovered
- Alaska Tidelands Survey Monument
- 3.5" Iron Pipe Reference Monument
- Power Pole
- Concrete
- Boardwalk

LOT SURVEY CERTIFICATION

I hereby certify that I have surveyed the property shown and described hereon, and that the improvements situated thereon are within the property lines and do not overlap or encroach on adjacent property and that no improvements on adjacent property overlap or encroach on the premises in question and that there are no roadways, utility lines or other visible easements on said property except as indicated hereon.

Date: 3/31/82

STATE OF ALASKA — 6135 — REGISTERED LAND SURVEYOR

REVISION DATE	DESCRIPTION	BY

AS-BUILT SURVEY

DIAMOND NN CANNERY

U.S. SURVEYS No's 2875, 1581, 69, 2957 & 1424
& ALASKA TIDELANDS SURVEY No 2(SM 17S, 47W)
LOCATED WITHIN SEC 1, T 17S, R 47 W., S.M., ALASKA

DOWL ENGINEERS — 1901 25th Street, Anchorage, Alaska 99503

SURVEY: DEL MONTE CORPORATION, 1 MARKET PLAZA, BOX 3575, SAN FRANCISCO, CALIFORNIA 94119

DRAWN BY - PDW	DATE - 3/31/82	W.O. D13908	GRID	FILE NO.	3
CHECKED BY - MPC	SCALE - 1" = 100'				

PER DRWG _____ F.B. 784