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: 2264.26.011

April 12, 2018

Ms. Elke Doom, City Manager
City of Valdez
P.O. Box 307
Valdez, AK 99866

Re: Decision Document: Sea Hawk Seafoods - Valdez
Cleanup Complete Determination

Dear Ms. Doom:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the Sea Hawk Seafoods – Valdez "site", located at 210 South Harbor Drive, Valdez. We understand Silver Bay Seafoods, LLC is now operating a seafood processing plant from this property. 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 Sea Hawk Seafoods – Valdez site, which is located in the ADEC office in Soldotna, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:
Sea Hawk Seafoods - Valdez
210 South Harbor Drive
Valdez, AK 99866

Name and Mailing Address of Contact Party:
Ms. Elke Doom
City of Valdez
P.O. Box 307
Valdez, AK 99866

DEC Site Identifiers:
File No.: 2264.26.011
Hazard ID.: 25070

Regulatory Authority for Determination:
18 AAC 78 and 18 AAC 75

Site Description and Background
The Sea Hawk Seafoods - Valdez site is located on property owned by the City of Valdez, and has been the location of a seafood processing facility since at least 1980. Sea Hawk Seafoods leased the property and operated the facility from 1980 until 2010. In 2010, Silver Bay Seafoods acquired the lease/facility, and continues to operate a seafood processing plant on the property.

The site is located on South Harbor Drive, on a small spit of land between the City of Valdez small boat harbor and Port Valdez. The portion of the spit the facility is located on was created from materials dredged during the construction of the adjacent small boat harbor in the early to mid-1960s. The site is surrounded, and underlain, by ocean waters.

Two underground fuel storage tanks (USTs) were installed on the property in 1983. The tanks were used to store gasoline (5,000-gallon) and diesel fuel (8,000-gallon). In October 1998 both tanks were excavated and removed. At the time of tank removal, soil samples were collected and analyzed for gasoline range organics (GRO), diesel range organics (DRO), and benzene, toluene, ethylbenzene and xylenes (BTEX). Petroleum contamination was detected in soil in the near vicinity of the tanks from near the ground surface to a depth of 15 feet below ground surface. The environmental consultant overseeing the work felt the petroleum releases were related to tank fillings and pumping of fuel from the tanks, because the tanks appeared to be in good condition. Groundwater is encountered at 11-16 feet below ground surface, depending on the stage of the tide. Petroleum sheen was visible on the groundwater in the tank removal excavation pit in 1998, and approximately 320 cubic yards of contaminated soil was placed in a lined soil storage cell on the property.

Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil and groundwater, and analyzed for GRO, DRO, and BTEX. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Diesel Range Organics (DRO)
- Benzene
- Ethylbenzene
- Xylenes

Cleanup Levels

Soil Cleanup Levels: The method 2 "migration to groundwater" soil cleanup levels established in 18 AAC 75.341 (c) and (d), Tables B1 and B2, Over 40 Inch Zone, apply. These soil cleanup levels apply because groundwater at a site is by default considered to be a drinking water source unless determined otherwise.

Groundwater Cleanup Levels: The groundwater cleanup levels established in 18 AAC 75.345, Table C apply at this site because groundwater at a site is by default considered to be a drinking water source unless determined otherwise.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (Migration to Groundwater) (mg/kg)	Groundwater (mg/L)
DRO	230	1.30
Benzene	0.022	0.0046
Ethylbenzene	0.13	0.015
Xylenes	1.50	0.190

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

Characterization and Cleanup Activities
Environmental site characterization and cleanup activities conducted under ADEC regulatory oversight began in 1998. These activities are described below.

In October, 1998, two regulated underground storage tanks were excavated and removed from the ground. The tanks were replaced with above ground fuel storage tanks.

Seven analytical soil samples, including one field duplicate, were collected from the base and sidewalls of the tank removal excavation pit. The samples were analyzed for BTEX, GRO, and DRO. DRO was detected at up to 11,000 mg/kg, benzene at up to 0.547 mg/kg, ethylbenzene at up to 4.57 mg/kg, and xylenes at up to 43.2 mg/kg. Approximately 320 cubic yards of excavated petroleum contaminated soil were placed into a lined and covered soil storage cell constructed on the property.

In September, 2008, a trench was excavated through the location of the former USTs in order to determine residual petroleum concentrations in soil and groundwater. The trench reached a maximum depth of 14 feet. Soil samples were collected and field screened during the trench work. No petroleum contamination was identified by field screening with a PID instrument, or visual and olfactory examination. A temporary monitoring well was set into the deepest portion of the excavation trench, at the location where the 1998 confirmation soil sampling identified the highest DRO concentrations. The following day, a groundwater sample and field duplicate sample were collected near the period of high ocean tide. The groundwater sample was tested for BTEX, GRO, and DRO. Only DRO was detected, at 0.684 mg/L.

The contaminated soils that were stockpiled on the property in 1998 were also assessed and sampled for petroleum contamination. Nine soil samples, including one field duplicate, were collected for laboratory analysis. The samples were analyzed for BTEX, GRO, and DRO. DRO was detected in seven soil samples. DRO exceeded its soil cleanup level in four samples, with the highest DRO concentration reported at 846 mg/kg. Benzene was detected in one of the eight soil samples, at 0.057 mg/kg. Ethylbenzene was detected in one of the eight soil samples at less than its 0.130 mg/kg soil cleanup level.

Based on the 2008 site characterization work, residual contaminant concentrations identified in soil and groundwater at the site can be summarized as follows:

Soil: Evidence of petroleum contaminated soil was not detected in the excavation trench at the location of the former USTs, where significant DRO concentrations were encountered in 1998.

DRO concentrations in the 320 cubic yard soil storage cell exceeded the approved soil cleanup level in four of eight samples collected, with the highest concentration reported at 846 mg/kg. Benzene was detected and exceeded its soil cleanup level in one of eight samples, at 0.057 mg/kg.

Groundwater: Groundwater sampled at the location of the former USTs met the approved groundwater 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 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-Minimis Exposure	Contamination is below the human health soil cleanup level.
Sub-Surface Soil Contact	De-Minimis Exposure	Contamination is below the human health soil cleanup level.
Inhalation – Outdoor Air	De-Minimis Exposure	Contamination is below the human health soil cleanup level.
Inhalation – Indoor Air (vapor intrusion)	De-Minimis Exposure	Contamination is below screening levels for indoor vapor intrusion.
Groundwater Ingestion	De-Minimis Exposure	Contamination is below the groundwater cleanup levels. Soil contaminants have been shown to not be migrating to groundwater.
Surface Water Ingestion	Pathway Incomplete	Surface (marine) 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	Contamination is judged to have no potential to contact adjacent marine waters.

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 has been cleaned up sufficiently to no longer pose an unacceptable risk to human health and the environment. Soil contamination remains onsite at concentrations above the approved cleanup levels, however sufficient characterization has been completed and ADEC has made a determination that the remaining contaminants in soil have achieved steady-state equilibrium and will not migrate to groundwater. 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 78.600(h). A "site" as defined by 18 AAC 78.995(134), 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.

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 at 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 78.276(f) 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 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) 262-3422, or email at paul.horwath@alaska.gov

Sincerely,

Paul Horwath

Paul Horwath
Project Manager

cc: Spill Prevention and Response, Cost Recovery Unit (*electronic copy*)