

#### STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600 (206) 407-6000 • TDD Only (Hearing Impaired) (206) 407-6006

August 8, 1995

Trident Seafoods Corporation 5th and "L" Avenue Anacortes, WA 98221-1858

To Whom It May Concern:

Ecology's contractor, SAIC, has completed the site hazard assessment (SHA) of Trident Seafoods Corporation, and Ecology concurs with their recommendation of a determination of no further action (NFA) under the Model Toxics Control Act (MTCA) at this time.

Ecology reserves the right to initiate further investigation at this site where new information is received indicating a potential/actual threat to human health and/or the environment through the release of hazardous substance(s).

For your information, Ecology will be publishing the results of this, and other recently completed, SHAs in the August 22, 1995 Special Issue of the Site Register.

Please contact me at (360) 407-7195 if you have any questions/comments regarding this SHA and the resultant determination of NFA.

Sincerely,

Michael J. Spencer

cc: Gary Gunderson, UNOCAL, Seattle
Norm Peck, Ecology NWRO TCP
John Thayer, Skagit County Health Department

Post-It" Fax Note 7671	Dota - 113 de brose 5
To / wise Barky	From m 7, Spener
Corbool TCP-NURO	Co. TCP-HO
Phone II	Phone II
Fax I	Fáx f

No Further Action Reco Site Hazard

Trident Seafoods Corporation

5th and L Avenue

Anacortes, Skagit County, Washington
T35N, R2E, Section 13

### BACKGROUND

In 1988, Trident Seafoods Corporation purchased a former fish processing facility from Whitney Fidalgo. The facility had two underground fuel tanks (each approximately 500 gallons), one storing gasoline and the other stove oil or diesel fuel. The tanks and surrounding contaminated soils (unknown quantity) were excavated and removed in August 1988. An additional 20 cubic yards were removed in 1989 after confirmational soil sampling. The site was backed filled with clean rock and gravel. The area is currently graveled and surrounded by asphalt pavement. A new building is proposed to be constructed over the site.

In addition to the buried fuel tanks on the former Whitney Fidalgo facility, three aboveground fuel storage tanks (from a small Union Oil terminal) existed at the western part of Trident's acquired property. The tanks were removed in 1975. In July 1989, petroleum contaminated soils and groundwater were found in an area 250 feet by 70 feet where a proposed cold storage warehouse was to be built. In September 1989, excavation and disposal of contaminated soil (2,344 tons) was completed. This site was backfilled with rock and sandy/gravelly fill. A cold storage warehouse currently occupies the site and it is surrounded by asphalt pavement. In a remedial action report filed by Dames & Moore in November 1989, confirmational sampling had determined that the remedial efforts had achieved Ecology's MTCA Method A clean-up levels. It was also noted that some contaminated soils were left in place; however, they were below the clean-up concentrations. A confirmational soil sample could not be obtained in one instance from an isolated patch of soil underneath the existing building foundation.

After the contaminated soils were excavated and prior to the addition of clean fill material, two samples of groundwater in the "soup" at the bottom of the excavation pit (less than 5 feet below surface grade) were analyzed for contaminants. The results indicated exceedances of Ecology's clean-up levels for BTEX, TPH, and lead. A groundwater monitoring scheme was recommended in the Dames & Moore remedial action report; however, none was implemented.

Further remedial work was conducted by Trident Seafoods in 1990 in response to a state shoreline permit with the removal of adjacent shoreline sediments (28,000 cubic yards contaminated primarily with petroleum hydrocarbons) in Guernes Channel. According to Mr. Pat Albee (Trident's Plant Engineer), there was some concern that the shallow groundwater may cominue to be a source of sediment contamination. However, because the contaminant sources were removed and backfilled with at least three feet of clean material and an asphalt cap; combined with removal of the contaminated sediments, the State granted Trident a shoreline permit.

The groundwater at this site is shallow (less than five feet below the ground surface) and brackish. Only one private well exists within the two mile radius, almost a mile away. The private well is assumed to provide drinking water to no more than four residents. Groundwater is used for irrigation of only 13 acres.

#### SHA ACTIVITIES

On April 6, 1995, the Department of Ecology mailed the facility a letter indicating that a Site Hazard Assessment would be performed at the site. The letter was telefaxed to Mr. Bob Nelson on April 19, 1995 by Mr. Jim Eldridge of Science Applications International Corporation in attempting to establish a site visit date. Jim Eldridge visited the site on April 27, 1995. During the site visit, Mr. Eldridge photographed the areas of the former underground storage tanks. The areas from which tanks and contaminated soils have been removed are either paved or are beneath an existing building.

# RECOMMENDATION

Because the site has been remediated, the groundwater pathway is the only route that potentially could be scored. However, this pathway is not likely to contribute to any human health risk or environmental risk because: 1) the very shallow groundwater at the site is not used, 2) only one private well, almost a mile away, is located within a two mile radius, 3) the majority of contaminated soils and sediments have been removed and backfilled with clean soils, 4) only a small quantity of residual contaminated subsurface soils (<5 cubic yards) may remain onsite, and 4) an asphalt cap has been placed over one area of previously contaminated soils and a building has been constructed over the second area of previously contaminated soils. The groundwater contamination that was documented during the 1989 remediation is likely to have been a function of the contamination with which it was in immediate contact. These reasons provide the basis for the recommendation that the site be remanded to the status of No Purther Action.