



May 18, 2015

Washington Department of Ecology, VCP
Ms. Louise Bardy
3190 160th Avenue SE, Northwest Regional Office
Bellevue, WA 98008-5452

Subject: Response to Early Notice Letter
Trident Seafoods Corporation
1400 4th Street, Anacortes, Washington
Facility Site # 49166566
Previous Facility Site ID 2672
Parcel # P55366
Cleanup Site # 860
UST # 619579

Dear Ms. Bardy:

On behalf of Trident Seafoods Corporation (Trident), G-Logics is responding to your letter dated February 27, 2015. Our response to your letter is presented below.

Ecology Letter Information

Due to the reported release from an underground storage tank (UST) at this property, Ecology is requesting that Trident conduct further investigation or cleanup actions. The UST previously had been located on the property, but was removed in 2009.

Your letter states that if an independent cleanup action is conducted, Trident has the option to request Ecology to review the performed work (under the Voluntary Cleanup Program). Your letter also states that if a cleanup action does not occur, Ecology would conduct more detailed inspections in order to assess a priority for future cleanup work. This cleanup work then would be conducted under a formal Model Toxics Control Act (MTCA) process.

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We also understand that other property-cleanup documents were reviewed by Ecology for the preparation of your letter. Specifically, based on pre-2009 property-cleanup reports, Ecology previously had issued a No Further Action (NFA) Determination for the property. Specifically, Ecology had determined that residual petroleum contamination, remaining after the prior cleanup, presented little risk, given that groundwater was not used and that the residual contaminants were capped with pavement and buildings.

UST-Removal Background

G-Logics prepared a report, dated March 13, 2009, that describes the removal of the identified UST. We understand our report met the notification and reporting requirements for removal of a fuel-storage UST. We also understand information in this report provided the basis for the Ecology letter of February 27, 2015.

Our tank-closure report described how the tank was found; only containing water with some residual fuel. Additionally, information was available that the tank likely had not used for more than 20 years. After Trident's discovery of the tank, the contained water and the tank were quickly removed from the property.

Our report also describes why associated contaminated soils could not be excavated at the time of tank removal. Specifically, numerous utilities and structural improvements were present, which would have been damaged by soil excavation in this area. Photographs included in our report (specifically Photograph 5) show the location of one of the at-risk supply lines exposed by the tank excavation.

Our report also describes how the impacted soils were capped beneath 3 feet of soil and an eight-inch thick layer of asphaltic pavement. As can be seen on Figure 1 and 2 of our report, the tank also was located in an area that not accessible to the general public. Furthermore, brackish groundwater in this area is not consumptively used, nor expected to be used. This groundwater is tidally influenced, expected to ultimately flow to the northwest, beneath a cold-storage building (Building B, on Figure 2).

Discussion

We recognize that confirmation samples collected in 2009 indicate "contamination" is present in the area of the former UST. We also recognize that the MTCA regulations make it difficult for Ecology to close a Site file when residual contamination remains. However,

for the following reasons, we do not believe that further assessment or cleanup in this area is warranted.

- The small tank had not been used for more than 20 years prior to its discovery.
- The tank only was found to contain water with a small volume of residual fuel.
- The water and the tank were quickly and physically removed from the property once discovered by Trident.
- Groundwater in this area is brackish and tidally influenced.
- Groundwater in this area is not used nor expected to be used for potable or industrial purposes.
- Since the tank-removal work, residual concentrations likely have diminished given the passage of time and tidal influences.
- The area of the former tank is not accessible to the general public.
- The area of the former tank has been covered with several feet of soil and asphaltic concrete, preventing direct contact.
- The Site previously received an NFA from Ecology, understanding that residual contaminants remained after the previous cleanup efforts at the property. This earlier review and subsequent NFA indicated the residual contaminants were not likely to pose a threat to human health or the environment, given the Site features.
- Future investigation in the area of the removed UST likely would be very difficult, given buried utilities and insulated floors within the cold-storage building.
- Given the same issues for this area, future cleanup work also would be very expensive and disproportionate to any risk-reduction achieved.
- The presumed small volume of residual contamination is limited and is not expected to result in significant exposure to workers or environmental receptors.
- Should detectable concentrations of contaminants discharge into surface water beneath the cold-storage building, some possible invertebrate toxicity may exist in a limited area. However, this potential risk is very small and of limited ecological significance, specifically as this area of the shoreline is covered by an over-water extension of Building B.
- Again, should detectable concentrations of contaminants discharge into surface water beneath Building B, avian and mammalian receptors likely also would not be at risk, as they have a much larger range than this limited area.

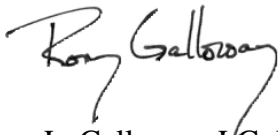
- The findings and expected risks from this 2009 tank-removal effort are not that dissimilar from the findings and risks reviewed for the prior property-cleanup work. This prior cleanup work received an NFA determination from Ecology.
- Trident Seafoods Corporation would not be opposed to implementing an institutional control (restrictive covenant) for this property. Should the property ever be converted to residential use in the future, additional investigation and/or remedial work could be conducted in this area.

Closing

We appreciate your consideration of our presented information. In summary, we believe that the conducted work and the current use of the property are protective of human health and the environment. Accordingly, it is our professional opinion that further investigation and/or cleanup work is not needed at this time.

Should you have any questions, please feel free to contact us at your convenience. We look forward to hearing your determination for the need for additional assessment or cleanup work.

Sincerely,
G-Logics, Inc.



Rory L. Galloway, LG, LHG
Principal

cc Kurt Esveldt
 Aaron DeSalvo