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FINAL

GENERAL WORK PLAN ADDENDUM DOT&PF Statewide PFAS Addendum 021-DUT-01 Initial Site Characterization UNALASKA, ALASKA



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- Submitted To: Alaska Department of Transportation & Public Facilities 2301 Peger Road Fairbanks, Alaska 99709 Attn: Sammy Cummings
- Subject: FINAL GENERAL WORK PLAN ADDENDUM, DOT&PF STATEWIDE PFAS ADDENDUM 021-DUT-01 INITIAL SITE CHARACTERIZATION, UNALASKA, ALASKA

Shannon & Wilson has prepared this Work Plan Addendum on behalf of the Alaska Department of Transportation & Public Factifies (DOT&PF). This Addendum is a supplement to the *DOT&PF Statewide PFAS General Work Plan* (GWP), dated July 2020. The services proposed in this GWP Addendum, 021-DUT-01, describes the DOT&PF planned activities for water supply well (WSW) search and sampling for per- and polyfluoroalkyl substances (PFAS) associated with the Tom Madsen Airport (DUT).

The scope of services was specified in our proposal dated June 16, 2022 and authorized by a notice to proceed (NTP) on August 26, 2022 by DOT&PF under Professional Services Agreement Number 25-19-013 *Per- and Polyfluorinated Substances (PFAS) Related Environmental & Engineering Services*.

This GWP Addendum was reviewed by:

Kristen Freiburger Associate, Statewide Project Manager

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Appendix A: Conceptual Site Model Appendix B: Site Safety and Health Plan Important Information

AAC	Alaska Administrative Code
AFFF	aqueous film forming foam
ARFF	Airport Rescue and Firefighting
As	arsenic
Cd	cadmium
COC	chemical of concern
COPC	contaminant of potential concern
CSM	Conceptual Site Model
DEC	Alaska Department of Environmental Conservation
DoD	Department of Defense
DOT&PF	Alaska Department of Transportation & Public Facilities
DRO	diesel range organics
DUT	Tom Madsen Airport
DVPP	Data-Validation Program Plan
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
GWP	General Work Plan
IDW	investigative-derived waste
LHA	lifetime health advisory
NTSB	National Transportation Safety Board
ng/L	nanograms per liter
PFAS	per- and polyfluoroalkyl substances
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
POC	point of contact
QA	quality assurance
QAPP	Quality Assurance Project Plan
QC	quality control
QSM	Quality Systems Manual 5.3
RL	reporting limit
SREB	Snow Removal Equipment Building
SSHP	Site Safety and Health Plan
USGS	United States Geological Survey
WSW	water supply well

ACRONYMS

1 INTRODUCTION

This Addendum, 021-DUT-01, is a supplement to the *DOT&PF Statewide PFAS General Work Plan – Revision 1* (GWP). This Addendum, in collaboration with the GWP, provides guidance to conduct a water supply well (WSW) search and sampling event for per- and polyfluoroalkyl substances (PFAS) near the Tom Madsen Airport (DUT) in Unalaska, Alaska (Figure 1, Exhibit 1-1).

Shannon & Wilson has prepared the GWP and this Addendum in accordance with Alaska Department of Environmental Conservation's (DEC) March 2017 *Site Characterization Work Plan and Reporting Guidance for Investigation of Contaminated Sites* (DEC, 2017) and January 2022 *Field Sampling Guidance* document (DEC, 2022a). If additional activities are required that are not covered in the GWP or deviations are made to the GWP, they will be described in this Addendum.

The DUT is a state-owned airport managed by the Alaska Department of Transportation and Public Facilities (DOT&PF). Additional information regarding the DUT is listed in Exhibit 1-1 below.

Airport Name:	Port Heiden Airport
Airport Code:	DUT
DEC File No. / Hazard ID:	No PFAS-related file listing or Hazard ID
Airport Address:	429 Airport Beach Rd, Unalaska, Alaska 99692
DOT&PF Region:	Southcoast
DOT&PF Regional POC:	Spencer Gates
DOT&PF PFAS POC:	Sammy Cummings
Airport Type:	Current Part 139 Airport
Airport Coordinates (Lat/Long):	53.8947, -166.5425

Exhibit 1-1: Airport Information

POC = point of contact; TBD = to be determined

1.1 Background

General background information relating to sites covered under the GWP is included in Section 1.1 of the GWP. Background information specific to the DUT is detailed below.

DOT&PF Aircraft Rescue and Firefighting (ARFF) services has used aqueous film forming foam (AFFF) for training and systems testing for many years. Part 139 airports are required to conduct annual AFFF systems testing to maintain their certification through the Federal Aviation Administration (FAA). Prior to 2019, FAA inspections required the release of AFFF to the ground surface.

Perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) are two PFAS commonly found at sites where AFFF were used. Due to their persistence, toxicity, and bioaccumulative potential, these compounds are of increasing concern to environmental and health agencies. In May 2016 the U.S. Environmental Protection Agency (EPA) published a recommended Lifetime Health Advisory (LHA) level of 70 nanograms per liter (ng/L) for the sum of PFOS and PFOA in drinking water. In June 2022 the EPA published Interim LHAs of 0.004 ng/L for PFOA and 0.02 ng/L PFOS, and Final LHAs of 2,000 ng/L for perfluorobutanesulfonic acid, and 10 ng/L for hexafluoropropylene oxide dimer acid and its ammonium salt (together referred to as "GenX chemicals").

The DEC Contaminated Sites Program published groundwater-cleanup levels of 400 ng/L for PFOS and PFOA in November 2016. Prior to the publication of these levels, there were no state-level cleanup levels established for PFAS. On October 2, 2019, DEC published a Technical Memorandum amending the April 9, 2019, Technical Memorandum to include additional PFAS analytes to the testing requirements. Per DEC guidance, the current action level remains 70 ng/L for the sum of PFOS and PFOA. A summary of the changes to action levels and regulatory requirements is described in Section 1.1 of the GWP.

Areas of known and potential use of AFFF at the DUT are shown on Figure 2. The quantity and timing of AFFF releases are unknown.

1.1.1 Previous Environmental Investigations

The following sections summarize various environmental investigations that may be of interest to understand PFAS contamination at DUT and in the WSW search area in the future.

1.1.1.1 Investigations and Incidents at DUT

Jet Crashes

An amphibious airplane (passenger capacity of approximately eight) collided with a trailer van while on approach to DUT in April 2008 (National Transportation Safety Board [NTSB], 2009). Approximately 100 gallons of fuel had been onboard when the plane took off (NTSB,

2008), but available documents do not indicate how much, if any, fuel was spilled following the collision. Additionally, there is no record regarding whether a fire occurred or if AFFF was used.

A commercial plane (passenger capacity of approximately 40) overran the end of the DUT runway, passed through a perimeter fence, crossed a road, and pitched down onto shoreline rocks in October 2019 (NTSB, 2020). Available documents do not indicate how much fuel was on board, whether any spilled, whether a fire occurred. A photo of the crash appears to show a mostly intact airplane hull. Follow up conversations with DOT&PF staff associated with the airport note fuel was spilled; however, AFFF was not used.

DOT&PF Snow Removal Equipment Building (SREB)

A 1,000-gallon heating oil spill from an overfilled aboveground storage tank was discovered at the DUT SREB in February 2007. Approximately 20 gallons of product were recovered during the initial spill response. Diesel range organics (DRO) were identified as contaminants of concern (COCs). During an interim removal action conducted in June 2007, approximately 100 cubic yards of soil were excavated and stockpiled in a long-term storage cell constructed at DUT. Soil in both the excavation and the stockpile were treated with a biological and nutrient mixture to enhance bioremediation. The site received a Cleanup Complete designation in April 2010 on the condition that DEC receive confirmation that the treated stockpile material was land spread (DEC, 2010). Fuelimpacted soil was discovered in 2016 during decommissioning of two underground injection control wells but subsequent sampling did not identify fuel concentrations at detectable levels (DEC, 2022a).

DOT&PF Airport Revetment 2

Petroleum-contaminated soil was identified in a revetment (an excavation into the hillside used for storage) approximately halfway down the DUT runway in 2017. A specific source for the contamination was not identified, but it may be related to historic storage of drums. DRO, residual range organics, naphthalene, 1-methynaphthalene, and 1,2,4-trimethylbenzene were identified as COCs. Test pit excavations delineated the extent of soil contamination, and it was determined that contaminants were not migrating.

The site received a Cleanup Complete designation in 2019 with the conditions that transport of soil or groundwater be approved by DEC; movement or use of contaminated material that violates applicable water quality standards is prohibited, and additional testing be considered if the groundwater pathway was ever found to be complete (DEC, 2019).

1.1.1.2 Investigations and Incidents Within WSW Search Area

Dutch Harbor- Aqua Fuel System #1

An aqua fuel system located across East Point Road from DUT was excavated and removed during the 1990s. Soil and groundwater fuel contamination was identified and natural attenuation with groundwater monitoring was selected as the remedial action. Monitoring indicated that the groundwater plume was shrinking, and the site was recommended for a Cleanup Complete designation with institutional controls in 2018. Available documents do not indicate whether the designation was officially granted (DEC, 2022b).

Delta Western Bulk Fuel Plant and Rocky Point

The Delta Western Bulk Fuel Plant and Rocky Point area cover approximately 90 acres to the south of the southeast end of the DUT runway. It extends, roughly, from Biorka Drive in the north to the southern tip of East Point Drive in the south, and from Iliuliuk Lake in the west to Margaret and Iliuliuk Bays in the east. The area includes active and inactive tank farms and contains approximately nine DEC contaminated sites, many of which are listed as Active (DEC, 2022c). The most common contaminants of concern are fuels and fuel constituents in soil and groundwater.

Landfills

Three landfill DEC sites are located in the southern half of the proposed WSW search area:

- Dutch Harbor-Strawberry Hill Landfill (DEC file number [#] 2542.38.020) is approximately 580 feet southwest of Iliuliuk Lake. Available site records indicate the landfill likely contained building debris, metal, concrete, and asbestos materials. Likely COCs are arsenic (As), cadmium (Cd), and iron (DEC, 2022d).
- Dutch Harbor-Fort Mears Landfill North (DEC # 2542.38.029) is on the north side of the intersection of Salmon Way and Airport Beach Road. It is thought to contain building debris and is covered by sparse vegetation. COCs are DRO, tetrachloroethylene, As, Cd, selenium, silver, and lead, and impacted media includes groundwater and sediment (DEC, 2022e).
- Dutch Harbor- Fort Mears Landfill South (DEC # 2542.38.029) is approximately 1,900 feet southwest of the northern Fort Mears landfill. Historical site photographs showed miscellaneous debris and possible discoloration in Unalaska Bay that may have been landfill waste. Additionally, lead was reportedly disposed of in the landfill (DEC, 2022f).

1.1.2 Climate

Climate conditions in Unalaska are characterized by relatively small temperature variations, heavy precipitation and snowfall, and frequent cloud cover. Average annual precipitation and snowfall are 60 and 90 inches, respectively (The City of Unalaska, 2022a).

1.1.3 Vegetation

Vegetation on Unalaska includes wildflowers and grasses and varies by habitat. Grasses and putchki (a large-leaf plant also known as wild celery) are common along the shoreline, while irises, orchids, violets, and blueberries can be found in meadows, marshes, and on hillsides. The upper slopes of Unalaska's mountains contain crowberry and pussytoes, while alpine lilies and lichens can be found in alpine area (Alaska.org, 2022a).

1.1.4 Geology and Soils

The major geologic formation on Amaknak Island, where DUT is located, is the Unalaska Formation. According to the United States Geological Survey (USGS) Geologic Map of Alaska, the Unalaska Formation is characterized by, "...a thick sequence of coarse and fine sedimentary and pyroclastic rocks intercalated with dacitic, andesitic, and basaltic flows and sills, cut by numerous dikes..." (USGS, 2022). The formation has been dated to the Miocene or late Oligocene age. Soils in the area tend to be composed of till, volcanic ash, and humus (USGS, 1961).

1.1.5 Hydrology

Drinking water for the City of Unalaska is provided by a surface water source and four groundwater wells (The City of Unalaska, 2022b). Available records and information do not identify the surface water body used for drinking water. Review of local well logs indicates none of the groundwater supply wells are on Amaknak Island (Alaska Department of Natural Resources, 2022).

1.2 Project Objectives and Scope

The project objective are to evaluate the potential for human exposure to PFAS in WSWs or drinking water sources at and near the DUT, and understand the approximate extent of PFAS contamination, if present, resulting from the historic use of AFFF by the DOT&PF at the DUT.

The scope of this initial WSW search and sampling effort includes:

- conducting a WSW search to confirm if groundwater is the source of drinking water near and downgradient of the DUT;
- sampling identified WSWs for PFAS, where access is provided; and
- investigating potential AFFF release sites at DUT through interviews with airport personnel.

The proposed well search area for the WSW sampling event is presented in Figure 2.

2 SITE AND PROJECT DESCRIPTION

The following sections provide a site and project description.

2.1 Site Location and Boundaries

The DUT is located immediately north of the town of Unalaska, Alaska on Amaknak Island. Amaknak Island sits in Unalaska Bay on the northeast end of Unalaska Island. The airfield's address is 429 Airport Beach Rd, Unalaska, Alaska 99692. The DUT consists of a paved 4,500-feet long by 100-feet wide runway and two paved taxiways. Taxiway A leads to the airport terminal at the southeast end of the runway and Taxiway B leads to a hanger on the northwest side of the runway. The facility is located at the southwest base of Mount Ballyhoo and sits on Nateekin Bay. It was built during World War II and was used as an operating base for the Aleutian Campaign (The City of Unalaska, 2022c).

Unalaska is a major population center in the Aleutian Island chain and is located in the Aleutians West Census Area. It is approximately 16 miles east of Makushin Volcano, an active volcano that has intermittently released ash since the 1980s (Alaska.org, 2022b). The geographic coordinates of the DUT terminal are latitude 53.8947 and longitude -166.5425.

2.2 Potential Sources of PFAS Contamination

General information regarding potential sources of contamination at DOT&PF sites to be covered under GWP is included in Section 2.1 of the GWP. Specific potential sources of contamination at the DUT and in the WSW search area are listed below:

Three known AFFF release areas (Figure 2) where annual FAA certification testing of fire suppression systems and/or firefighting training events took place. Exact quantities of AFFF released are unknown due to various testing requirements the FAA inspector(s) outlined during certification or training events. Additionally, training event documentation was not required and available information on AFFF volumes and release frequency may not be representative.

- Potential leaks or spills from AFFF storage areas like the DOT&PF's SREB.
- DOT&PF Airport Revetment 2, which historically housed drums. Available site documents do not indicate what type(s) of materials or chemicals were stored in the drums.
- The DUT runway where two jets crashed, one in 2008 and one in 2019. Available site documents do not indicate if fuel spilled or fires started, but it is likely that AFFF would have been used to suppress fires if they did occur.
- Potential use of AFFF at the Dutch Harbor Aqua Fuel System #1 DEC site (Section 1.1.1.2).
- Potential use of AFFF at the Delta Western Bulk Fuel Plant and Rocky Point tank farms (Section 1.1.1.2).
- Potential disposal of AFFF or PFAS-containing materials at the local landfills (Section 1.1.1.2).

2.3 Contaminants of Potential Concern and Regulatory Levels

General information regarding COPCs and regulatory levels is included in Section 2.2 of the GWP. The primary COPCs for this project are PFAS compounds, specifically PFOS and PFOA. DEC's *Field Sampling Guidance* also identifies gasoline range organics, DRO, residual range organics, benzene, toluene, ethylbenzene, and xylenes, and polynuclear aromatic hydrocarbons as COPCs at ARFF training areas. However, we note this is outside the scope of this Addendum.

Groundwater samples will be compared to Alaska's 18 Alaska Administrative Code (AAC) 75.341 Table C, Groundwater Human Health Cleanup Level and the DEC drinking water action level. The current cleanup levels and analytical reporting limits for the site COPCs are summarized below in Exhibit 2-1.

Method	Analyte	Regulatory Limitª (ng/L)	DEC Drinking Water Action Level (ng/L)	Laboratory RLs ^b (ng/L)	
DoD QSM	PFOS	400	70	2.0	
Table B-15 ^c	PFOA	400	70	2.0	

Exhibit 2-1: COPCs, Regulatory and Laboratory Reporting Limits

Notes:

b. Current RLs from Eurofins Environmental Testing, Inc. for PFAS analyses.

c. All available PFAS analytes will be requested for analytical reports. However, only PFOS and PFOA have DEC Cleanup Levels and are reported in this table.

DoD = Department of Defense, ng/L = nanogram per liter, PFOA = perfluorooctanoic acid, PFOS = perfluorooctanesulfonic acid, QSM= Quality Systems Manual, RL = reporting limit

a. 18 AAC 75 Table C. Groundwater Cleanup Levels.

2.4 Conceptual Site Models and Site Safety and Health Plans

A conceptual site model (CSM) describes potential pathways between a contaminant source and possible receptors (i.e., people, animals, and plants) and is used to determine who may be at risk of exposure to those contaminants. A DEC *Human Health Conceptual Site Model Graphic Form* and a *Human Health Conceptual Site Model Scoping Form* were completed based on the preliminary understanding of site conditions. These forms are included in Appendix A of this Addendum.

Very little is known about potential PFAS-affected media at and beneath the DUT. The draft CSM will be revised and presented in the final report following the receipt of analytical data. Potentially affected media include contaminated soil, groundwater, surface water, sediment, and biota. Potential human exposure pathways include:

- Incidental soil ingestion;
- Dermal absorption of contaminants from soil, groundwater, or surface water;
- Inhalation of fugitive dust;
- Ingestion of groundwater (e.g., WSWs);
- Direct contact with sediment; and
- Ingestion of wild or farmed foods.

2.5 Project Team

Chris Darrah will be Shannon & Wilson's Principal-in-Charge and Kristen Freiburger will serve as the overall Statewide Project Manager. A site Project Manager will be selected if additional PFAS investigative efforts are needed following this first round of sampling. Shannon & Wilson's project team also includes other State of Alaska Qualified Environmental Professionals to support the various field and reporting tasks required to achieve the project objectives. The project team and their associated responsibilities are summarized in Exhibit 2-2 below.

Affiliation	Responsibility	Representative	Contact Number
	Client – Regional POC	Spencer Gates	(907) 465-1787
DOT&PF	Client – Statewide PFAS POC	Sammy Cummings	(907) 888-5671
DEC	Regulatory agency POC	Bill O'Connell	(907) 269-3057
	Principal-in-charge	Christopher Darrah	(907) 458-3143
Shannon & Wilson	Statewide Project Manager	Kristen Freiburger	(907) 458-3146
	Project Manager	TBD	TBD
Eurofins Environment Testing	PFAS analytical laboratory services	David Alltucker	(916) 374-4383

Exhibit 2-2: Project Team

POC = point of contact

2.6 Project Schedule and Submittals

Section 2.5 of the GWP provides general information regarding project schedules (i.e., the general order of occurrence of site characterization activities) and associated submittals.

Once DEC approval is received for the proposed scope of services outlined in this Addendum, Shannon & Wilson will coordinate with DOT&PF staff to collect samples from WSWs at and near the DUT. Field activities are anticipated to occur during January or February 2023, weather permitting. Laboratory analysis will be requested on a standard 15business-day turn-around time. Following receipt of the analytical results, we will provide DOT&PF and DEC with a map and table of the results. Results letters will also be prepared and mailed to the sampled WSW owner/user, if applicable.

The following is the anticipated schedule:

- DEC comments addressed; approval received December 2022
- Work Plan Implementation (field activities) January or February 2023
- Analytical summary of data reported to DOT&PF and DEC within 2 business days of data receipt
- Analytical data table and map reported to DOT&PF and DEC within 3 business days of data receipt
- WSW owner/user notification of results following delivery of results to DEC

Seasonal factors, including depth to groundwater and freezing conditions, may impact Shannon & Wilson's ability to perform the field effort outlined in this document. We will inform DOT regarding any scheduling changes.

3 WATER SUPPLY WELL SAMPLING ACTIVITIES

The following sections describe the WSW sampling activities to be conducted at and near the DUT. Sampling procedures and analytical methods are described in Section 4. A Quality Assurance Program Plan (QAPP) is included in Section 5.

3.1 Water Supply Well Search

General information regarding WSW search activities is described in Section 3.1 of the GWP.

Available information indicates a municipal water utility is provided in Unalaska. According to the City of Unalaska website, the city water service is supplied by four groundwater wells and one surface water body. The locations of these water supplies wells and surface water body are shown on the DEC Drinking Water Source Protections map and are unlikely to be influenced by firefighting activities at the airport. The City of Unalaska website notes that there are "approximately 572 service connections to residents, schools and businesses." Given the population in Unalaska (approximately 4,200 people) it is likely there are other water sources outside of the municipal water connection being utilized. It is unclear if the municipal water connection is supplied to residences and businesses located in the search area (Figure 2). Prior to mobilizing to the site, we will contact the city administrators to obtain information regarding where the water connections are provided. We will also speak with the leasing department for DOT&PF Statewide Aviation to obtain information regarding the use of WSWs near the airport. Additionally, we will coordinate with DOT&PF to mail letters to residences and businesses with the search area prior to mobilizing to determine if wells are present and used for indoor plumbing uses. If premobilization activities indicate wells or drinking water sources near the airport could be impacted by AFFF use, we will mobilize to the site to conduct the well search effort.

After reviewing available area maps and property-ownership records for Unalaska, where available, Shannon & Wilson will prepare detailed maps for the well search field effort. Field staff will visit parcels in the well search area to identify structures that may use groundwater for drinking water. We will make a reasonable attempt to contact the owners or occupants to inquire about their water source and obtain permission to collect samples. Shannon & Wilson will collect PFAS samples from any identified WSWs in the search area for which permission to sample has been given by the owner(s) or occupant(s).

3.2 Water Supply Well Activities

Groundwater characterization activities for this project include groundwater sample collection from WSWs as described in the following sections. General information regarding WSW activities is described in Section 4.1 of the GWP. Field personnel will document field activities with field notes and photographs as well as applicable field forms (Appendix B of GWP), as detailed in Section 5.2. Analytical laboratories and methods employed as a part of this Addendum are identified in Section 4.3.

4 SAMPLING AND ANALYSIS PLAN

This section describes the analytical sampling approach for investigating PFAS contamination associated with the DUT. A DEC-qualified sampler will collect and handle the samples for projects covered under the GWP and this Addendum and collect required quality control (QC) samples in accordance with DEC's *Field Sampling Guidance*. A general Sampling and Analysis Plan is included as Section 4 of the GWP. Sample containers, preservation methods, and holding times are included in Section 4.4. Sample custody, storage, and transport will be followed as described in Section 4.5. Investigative-derived waste (IDW) management is described in Section 4.7.

4.1 Analytical Sample Summary

We estimate there are approximately 75 permanent structures in the WSW search area. We further estimate that approximately 85% of those locations could have a well and we will be allowed to collect a sample.

An analytical sample summary is detailed in Exhibit 4-1 below.

Exhibit 4-1: Analytical Sample Summary

Number of Samples	Matrix	PFAS (QSM 5.3 Table B-15)
oumpies	Groundwater	65 + 7 DUPs

Notes:

DUP = field-sample duplicate; PFAS = per- and polyfluoroalkyl substances; QSM = Quality Systems Manual

4.2 Special Considerations for PFAS Sampling

Special considerations for PFAS sampling are outlined in Section 4.10 of the GWP.

4.3 Analytical Laboratories and Methods

PFAS samples will be submitted to Eurofins Environment Testing of West Sacramento, California. Based on the DEC Technical Memorandum issued on October 2, 2019, PFAS analysis will report the 18 DEC-approved PFAS compounds as listed in EPA 537 Modified Method that complies with the Department of Defense (DoD) Quality Systems Manual (QSM) Version 5.3 Table B-15. Upon collection of the samples, authorized personnel will store and prepare the samples for analysis, taking into consideration sample holding times for the analysis.

4.4 Sample Containers, Preservation, and Holding Times

General information regarding sample containers, preservation, and holding times is described in Section 4.12 of the GWP. This information is provided in Exhibit 4-2, below, for the analytical methods employed for this project.

Exhibit 4-2: Sample Containers, Preservation, and Holding Time Requirements

Analyte	Method	Media	Container and Sample Volume	Preservation	Holding Time
PFAS	DoD QSM 5.3 Table B- 15	Drinking Water	2 x 250 mL polycarbonate	0 °C to 6 °C	14 days

NOTES:

DoD = Department of Defense, PFAS = per- and polyfluoroalkyl substances, QSM = Quality Systems Manual

4.5 Sample Custody, Storage, and Transport

Sample custody, storage, and transport procedures are described in Section 4.13 of the GWP.

4.6 Equipment Decontamination

Equipment decontamination procedures are described in Section 4.14 of the GWP. We note that disposable sampling equipment is typically used to collect WSW samples and equipment decontamination is not likely to be needed for this project.

4.7 Investigative Derived Waste Management

IDW will generally consist of purge water generated during WSW sampling. Where wells are not connected to the indoor plumbing, purge water will be filtered using a granulated activated carbon filter and then discharged to the ground surface. Where samples are collected from the home/business plumbing, purge water will be disposed of using the method utilized at the property (e.g., septic system). Other IDW will primarily consist of disposable sampling equipment (nitrile gloves, transfer cups, etc.) and will be disposed of at the nearest landfill.

4.8 Deviations from the General Work Plan

No deviations to the GWP are planned at this time.

5 QUALITY ASSURANCE PROJECT PLAN

This QAPP is intended to guide activities during assessment and review of resulting data. Shannon & Wilson will be responsible for conducting data reduction, evaluation, and reporting under this QAPP. A general QAPP is provided as Section 5 of the GWP. Additionally, a Data-Validation Program Plan (DVPP), which describes the procedures for qualifying analytical data in a consistent manner, has been prepared and is included as Appendix C to the GWP. We note an updated DVPP was submitted to DEC in June 2022. The following sections describe specific procedures to be followed during sampling at the DUT so that sampling and documentation are effective, laboratory data are usable, and the information acquired is of high quality and reliable.

5.1 Quality Assurance Objectives

Data quality objectives are detailed in Section 5.1 of the GWP. Numeric QA objectives for this project are presented in Exhibit 5-1 below.

Analyte	Method	Matrix	Precision	Accuracy	Completeness
PFAS	DoD QSM 5.3 Table B-15	Water	±30%	(analyte dependent)	85%

Exhibit 5-1: Quality Assurance Objectives for Analytical Samples

NOTES:

DoD = Department of Defense; PFAS = per- and polyfluoroalkyl substances; QSM = Quality Systems Manual

5.2 Field Documentation

Field documentation is described in Section 5.2 of the GWP. Field forms to be used for this project are included in Appendix B of the GWP.

5.3 Field Instrument Calibration

Field instrument calibration (e.g., YSI) is discussed in Section 5.3 of the GWP.

5.4 Field Quality Control Samples

The field quality assurance (QA)/QC program for this project includes the collection of the QA/QC samples described in the following sections.

5.4.1 Field Duplicate Sample

Field duplicate sample collection procedures are described in Section 5.4.1 of the GWP. One field duplicate will be collected for every 10 primary samples. Refer to Exhibit 4-1 for the planned number of field duplicates.

5.4.2 Equipment Blank Samples

Equipment blank sample collection procedures are described in Section 5.4.4 of the GWP. We note it is unlikely equipment blanks will be needed for WSW sampling.

5.4.3 Temperature Blank Samples

Temperature blanks are described in Section 5.4.6 of the GWP.

5.5 Laboratory Quality Control Samples

Laboratory quality control samples are described in Section 5.5 of the GWP.

5.6 Laboratory Data Deliverables

Laboratory data deliverables are described in Section 5.6 of the GWP.

5.7 Data Reduction, Evaluation, and Reporting

Data reduction, evaluation, and reporting requirements are discussed in Section 5.7 of the GWP.

6 REFERENCES

- Alaska Department of Environmental Conservation (DEC), 2010, Record of Decision-DOT&PF SREB Unalaska Airport, Cleanup Complete. Anchorage, Alaska, DEC Division of Spill Prevention and Response, Contaminated Sites Program, April 29.
- Alaska Department of Environmental Conservation (DEC), 2017, Site Characterization Work Plan and Reporting Guidance for Investigation of Contaminated Sites: Juneau, Alaska, DEC Division of Spill Prevention and Response, Contaminated Sites Program, March, available: http://dec.alaska.gov/spar/csp/guidance_forms/csguidance.htm.
- Alaska Department of Environmental Conservation (DEC), 2019, Decision Document: DOT&PF Unalaska Airport Revetment #2 Cleanup Complete Determination. Anchorage, Alaska, DEC Division of Spill Prevention and Response, Contaminated Sites Program, File No. 2661.38.016, March 14.
- Alaska Department of Environmental Conservation (DEC), 2021, 18 AAC 75.345, Groundwater Cleanup Levels: Juneau, Alaska, Alaska Administrative Code (AAC), Title 18, Chapter 75, Section 341, January, available: http://dec.alaska.gov/commish/regulations/.
- Alaska Department of Environmental Conservation (DEC), 2022a, Field Sampling Guidance for Contaminated Sites and Leaking Underground Storage Tanks: Juneau, Alaska, DEC Division of Spill Prevention and Response, Contaminated Sites Program, October, available: http://dec.alaska.gov/spar/csp/guidance_forms/csguidance.htm.
- Alaska Department of Environmental Conservation (DEC), 2022a, Site Report: DOT&PF SREB & Chemical Storage Bldg Unalaska Airport: September, available: <u>https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/25415</u>.
- Alaska Department of Environmental Conservation (DEC), 2022b, Site Report: Dutch HBR-Aqua Fuel System #1: September, available: <u>https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/517</u>.
- Alaska Department of Environmental Conservation (DEC), 2022c, Alaska DEC Contaminated Sites Map Search: September, available: <u>https://www.arcgis.com/apps/mapviewer/index.html?webmap=315240bfbaf84aa0b</u> <u>8272ad1cef3cad3</u>.

- Alaska Department of Environmental Conservation (DEC), 2022d, Site Report: Dutch HBR-Strawberry Hill Landfill: September, available: https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/1369.
- Alaska Department of Environmental Conservation (DEC), 2022e, Site Report: Dutch HBR-Fort Mears Landfill (North): September, available: <u>https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/25819</u>.
- Alaska Department of Environmental Conservation (DEC), 2022f, Site Report: Dutch HBR-Fort Mears Landfill (South): September, available: <u>https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/25820</u>.
- Alaska Department of Natural Resources (DNR), 2022, Well Log Tracking System (WELTS): September, available: <u>https://dnr.alaska.gov/welts/</u>.
- Alaska.org, 2022a, Unalaska Plants and Flowers: September, available: <u>https://www.alaska.org/detail/unalaska-plants-and-flowers</u>.
- Alaska.org, 2022b, Makushin Volcano: September, available: <u>https://www.alaska.org/detail/makushin-volcano</u>.
- The City of Unalaska, Alaska, 2022a, Weather: September, available: <u>https://www.ci.unalaska.ak.us/community/page/weather</u>.
- The City of Unalaska, Alaska, 2022b, Drinking Water- Known What You Drink: September, available: <u>https://www.ci.unalaska.ak.us/publicutilities/page/drinking-</u> <u>water#:~:text=The%20City%20of%20Unalaska%20provides%20drinking%20water</u> <u>%20through,also%20maintain%20one%201%2F2-million%20gallon%20above-</u> <u>ground%20steel%20reservoir</u>.
- The City of Unalaska, Alaska, 2022c, World War II in the Aleutians: September, available: https://www.ci.unalaska.ak.us/community/page/world-war-ii-aleutians.
- National Transportation Safety Board (NTSB), 2008, Pilot/Operator Aircraft Accident/Incident Report, NTSB Accident/Incident No. ANC08FA050, April 25.
- National Transportation Safety Board (NTSB), 2009, Airports Specialist Report, Accident ANC08FA050. Prepared for the NTSB Office of Aviation Safety, Washington, D.C., April 7.
- National Transportation Safety Board (NTSB), 2020, Group Chairmen's Factual Report, Operational Factors/Human Performance, Accident DCA20MA002. Prepared for the NTSB Office of Aviation Safety, Washington, D.C., October 13.

- Shannon & Wilson, 2022, Data-Validation Program Plan, DOT&PF Statewide PFAS, Various Sites, Alaska, July.
- United States Geological Society (USGS), 1961, Geology of Unalaska Island and Adjacent Insular Shelf, Aleutian Islands, Alaska: Prepared by Mr.s Harald Drewes, G. D. Fraser, G. L. Snyder, and H. F. Barnett, Jr. in cooperation with the Office, Chief of Engineers, U.S. Army, Geological Survey Bulletin 1028-S.
- United States Geological Society (USGS), 2022, Geologic Map of Alaska: September, available: <u>https://alaska.usgs.gov/science/geology/state_map/interactive_map/AKgeologic_m</u> <u>ap.html</u>.

EWISHANNON & WILSON

102219-021





December 2022 VICINITY MAP Figure 1

EWISHANNON & WILSON

102219-021





PEAS/

Notes: 1. AFFF: Aqueous Film Foarming Foam 2. Search area is approximate December 2022 SITE MAP Figure 2

Appendix A

Conceptual Site Model

Scoping and Graphics Forms

CONTENTS

- Human Health Conceptual Site Model Scoping Form and Standardized Graphic
- Human Health Conceptual Site Model Graphic Form

Appendix A - Human Health Conceptual Site Model Scoping Form and Standardized Graphic

Site Name:	ADOT&PF Tom Madsen Airport Sitewide PFAS
File Number:	ТВД
Completed by:	Morgen Donohue, Shannon & Wilson, Inc.

Introduction

The form should be used to reach agreement with the Alaska Department of Environmental Conservation (DEC) about which exposure pathways should be further investigated during site characterization. From this information, summary text about the CSM and a graphic depicting exposure pathways should be submitted with the site characterization work plan and updated as needed in later reports.

General Instructions: Follow the italicized instructions in each section below.

1. General Information:

Sources (check potential sources at the site)

□ USTs	☐ Vehicles				
☐ ASTs	☐ Landfills				
Dispensers/fuel loading racks	Transformers				
	☑ Other: Aqueous Film Forming Foam (AFFF) releases				
Release Mechanisms (check potential release mechanisms at the site)					
⊠ Spills	🖂 Diraat digaharga				

Spills	⊠ Direct discharge
🗵 Leaks	Burning
	□ Other:

Impacted Media (check potentially-impacted media at the site)

⊠ Surface soil (0-2 feet bgs*)	🗵 Groundwater
⊠ Subsurface soil (>2 feet bgs)	Surface water
Air	🗵 Biota
⊠ Sediment	Other:

Receptors (check receptors that could be affected by contamination at the site)

- $\overline{|X|}$ Residents (adult or child)
- \boxtimes Commercial or industrial worker
- $\overline{\times}$ Construction worker
- \boxtimes Subsistence harvester (i.e. gathers wild foods)
- \boxtimes Subsistence consumer (i.e. eats wild foods)
- ☑ Site visitor☑ Trespasser
- $\overline{\times}$ Recreational user
- 🗵 Farmer

Other:

^{*} bgs - below ground surface

- **2. Exposure Pathways:** (*The answers to the following questions will identify complete exposure pathways at the site. Check each box where the answer to the question is "yes".*)
- a) Direct Contact -

b)

1. Incidental Soil Ingestion

Are contaminants present or potentially present in surface soil between 0 and 15 feet below the ground surface? (Contamination at deeper depths may require evaluation on a site-specific basis.)

If the box is checked, label this pathway complete:	Complete	
Comments:		
No surface soil samples have been collected at the DUT However, AFFF could cause soil contamination.	releases to the ground surface	
2. Dermal Absorption of Contaminants from Soil		
Are contaminants present or potentially present in surface soil (Contamination at deeper depths may require evaluation on a s		the ground surface? \boxtimes
Can the soil contaminants permeate the skin (see Appendix B i	in the guidance document)?	\overline{X}
If both boxes are checked, label this pathway complete:	Complete	
Comments:		
No surface soil samples have been collected at the DUT. However, AFFF could cause soil contamination.	releases to the ground surface	
According to the Alaska Department of Health and Social Services, PFOS	and PFOA are not appreciably	
Ingestion - 1. Ingestion of Groundwater		
Have contaminants been detected or are they expected to be detected in the groundwater, or are contaminants expected to migrate to groundwater in the future?		X
Could the potentially affected groundwater be used as a curren source? Please note, only leave the box unchecked if DEC has water is not a currently or reasonably expected future source of to 18 AAC 75.350.	determined the ground-	\boxtimes
If both boxes are checked, label this pathway complete:	Complete	
Comments:		
No water supply well samples have been collected at or down-gradient contaminated groundwater is possible.	of the DUT. However, PFAS	

2. Ingestion of Surface Water

Have contaminants been detected or are they expected to be detected in surface water, or are contaminants expected to migrate to surface water in the future?

Could potentially affected surface water bodies be used, currently or in the future, as a drinking water source? Consider both public water systems and private use (i.e., during residential, recreational or subsistence activities).

If both boxes are checked, label this pathway complete:	Incomplete
Comments:	
Surface water at/near the DUT is primarily salt water and would not be us	ed as a drinking water source.
3. Ingestion of Wild and Farmed Foods	
Is the site in an area that is used or reasonably could be used for harvesting of wild or farmed foods?	hunting, fishing, or
Do the site contaminants have the potential to bioaccumulate (see document)?	ee Appendix C in the guidance
Are site contaminants located where they would have the potent biota? (i.e. soil within the root zone for plants or burrowing dep groundwater that could be connected to surface water, etc.)	-
If all of the boxes are checked, label this pathway complete:	Complete
Comments:	
Inhalation-	
1. Inhalation of Outdoor Air	
Are contaminants present or potentially present in surface soil b ground surface? (Contamination at deeper depths may require e	
Are the contaminants in soil volatile (see Appendix D in the g	uidance document)?
If both boxes are checked, label this pathway complete:	Incomplete

Comments:

PFAS are not included in Appendix D. If volatile organic compounds are reported during site characterization activities, this section will be updated with the new information.

 \overline{X}

 \square

2. Inhalation of Indoor Air

Are occupied buildings on the site or reasonably expected to be occupied or placed on the site in an area that could be affected by contaminant vapors? (within 30 horizontal or vertical feet of petroleum contaminated soil or groundwater; within 100 feet of non-petroleum contaminted soil or groundwater; or subject to "preferential pathways," which promote easy airflow like utility conduits or rock fractures)

Are volatile compounds present in soil or groundwater (see Appendix D in the guidance document)?

If both boxes are checked, label this pathway complete:

Incomplete

Comments:

See comments for 3.c.1.

 \overline{X}

 \square

3. Additional Exposure Pathways: (Although there are no definitive questions provided in this section, these exposure pathways should also be considered at each site. Use the guidelines provided below to determine if further evaluation of each pathway is warranted.)

Dermal Exposure to Contaminants in Groundwater and Surface Water

Dermal exposure to contaminants in groundwater and surface water may be a complete pathway if:

- Climate permits recreational use of waters for swimming.
- Climate permits exposure to groundwater during activities, such as construction.
- Groundwater or surface water is used for household purposes, such as bathing or cleaning.

Generally, DEC groundwater cleanup levels in 18 AAC 75, Table C, are deemed protective of this pathway because dermal absorption is incorporated into the groundwater exposure equation for residential uses.

Check the box if further evaluation of this pathway is needed:

Comments:

According to the Alaska Department of Health and Social Services, PFOS and PFOA are not appreciably absorbed through the skin. However, Appendix B of the 2017 Guidance on Developing Conceptual Site Models lists both PFOS and PFOA. We consider dermal exposure to these compounds to be insignificant for the purposes of this CSM.

Inhalation of Volatile Compounds in Tap Water

Inhalation of volatile compounds in tap water may be a complete pathway if:

- The contaminated water is used for indoor household purposes such as showering, laundering, and dish washing.
- The contaminants of concern are volatile (common volatile contaminants are listed in Appendix D in the guidance document.)

DEC groundwater cleanup levels in 18 AAC 75, Table C are protective of this pathway because the inhalation of vapors during normal household activities is incorporated into the groundwater exposure equation.

Check the box if further evaluation of this pathway is needed:

Comments:

PFAS are not included in Appendix D.

 \square

 \mathbf{X}

Inhalation of Fugitive Dust

Inhalation of fugitive dust may be a complete pathway if:

- Nonvolatile compounds are found in the top 2 centimeters of soil. The top 2 centimeters of soil are likely to be dispersed in the wind as dust particles.
- Dust particles are less than 10 micrometers (Particulate Matter PM₁₀). Particles of this size are called respirable particles and can reach the pulmonary parts of the lungs when inhaled.

DEC human health soil cleanup levels in Table B1 of 18 AAC 75 are protective of this pathway because the inhalation of particulates is incorporated into the soil exposure equation.

Check the box if further evaluation of this pathway is needed:

Comments:

No surface soil samples have been collected at the DUT. However, AFFF was likely released to the ground surface on the runways that can be dusty in the summertime.

Direct Contact with Sediment

This pathway involves people's hands being exposed to sediment, such as during some recreational, subsistence, or industrial activity. People then incidentally ingest sediment from normal hand-to-mouth activities. In addition, dermal absorption of contaminants may be of concern if the the contaminants are able to permeate the skin (see Appendix B in the guidance document). This type of exposure should be investigated if:

- Climate permits recreational activities around sediment.
- The community has identified subsistence or recreational activities that would result in exposure to the sediment, such as clam digging.

Generally, DEC direct contact soil cleanup levels in 18 AAC 75, Table B1, are assumed to be protective of direct contact with sediment.

Check the box if further evaluation of this pathway is needed:

 \times

 \overline{X}

Comments:

No sediment samples have been collected at the DUT. However, AFFF was likely release to the ground surface and runoff could occur to surface water bodies. Additionally, local residents may use subsistence practices (e.g., berry picking and fishing) that may expose them to sediment.

4. Other Comments (*Provide other comments as necessary to support the information provided in this form.*)

This initial CSM will be revised following the receipt of analytical data.

HUMAN HEALTH CONCEPTUAL SITE MODEL GRAPHIC FORM

Site: ADOT&PF Tom Madsen Airport Sitewide PFAS Instructions: Follow the numbered directions below. Do not File Number TBD consider contaminant concentrations or engineering/land use controls when describing pathways. Completed By: Morgen Donohue, Shannon & Wilson, Inc. Date Completed: September 2022 (5) Identify the receptors potentially affected by each exposure pathway: Enter "C" for current receptors "F" for future receptors, "C/F" for both current and (1) (2) (3) (4) future receptors, or "I" for insignificant exposure. For each medium identified in (1), follow the Check all pathways that could be complete. Check the media that Check all exposure **Current & Future Receptors** top arrow and check possible transport media identified in (2). The pathways identified in this column must could be directly affected by the release. mechanisms. Check additional media under agree with Sections 2 and 3 of the Human Farmers or subsistence (1) if the media acts as a secondary source. Health CSM Scoping Form. ^{, consumers} Construction workers Site visitors, trespassi or recreational users Residents (adults or children) Commercial or industrial workers **Transport Mechanisms Exposure Pathway/Route** Media **Exposure Media** Subsistence _c $\overline{\mathbf{A}}$ Direct release to surface soil check soil ✓ Migration to subsurface [check soi Surface Other ✓ Migration to groundwater [Soil check groundwater (0-2 ft bgs) Volatilization check a C/F C/F C/F C/F C/F C/F Runoff or erosion Incidental Soil Ingestion 1 check surface wate ✓ Uptake by plants or animals check biota soil Dermal Absorption of Contaminants from Soil \checkmark Other (list): C/F C/F C/F C/F Inhalation of Fugitive Dust Direct release to subsurface soil \checkmark check soil Subsurface 1 Migration to groundwater check aroundwater C/F C/F C/F C/F C/F Ingestion of Groundwater Soil check ai Volatilization (2-15 ft bgs) Dermal Absorption of Contaminants in Groundwater \checkmark Uptake by plants or animals check biota 🔽 groundwater Other (list): Inhalation of Volatile Compounds in Tap Water Direct release to groundwater $\mathbf{\nabla}$ check groundwater Volatilization check ai Inhalation of Outdoor Air Ground-Flow to surface water body check surface wate water air Inhalation of Indoor Air Flow to sediment Inhalation of Fugitive Dust Uptake by plants or animals check biota Other (list): Ingestion of Surface Water \checkmark Direct release to surface water check surface water Volatilization check air Dermal Absorption of Contaminants in Surface Water surface water Surface ✓ Sedimentation check sediment Water Inhalation of Volatile Compounds in Tap Water ✓ Uptake by plants or animals check biota Other (list):_ C/F C/F C/F C/F C/F Direct Contact with Sediment sediment Direct release to sediment $\overline{}$ check sediment ✓ Resuspension, runoff, or erosion check surface wate Sediment ✓ Uptake by plants or animals check biota C/F C/F C/F C/F C/F $\overline{}$ biota Ingestion of Wild or Farmed Foods Other (list):

Revised, 10/01/2010

Appendix B Site Safety and Health Plan

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-	 B.1.1 Chemical-Exposure Hazards

SITE SAFETY AND HEALTH PLAN

Shannon & Wilson prepared this Site Safety and Health Plan (SSHP) for the water supply well (WSW) well search and sampling activities at and near the Tom Madsen Airport (DUT). The purpose of this SSHP is to protect the health and safety of field personnel from physical and chemical hazards associated with work at this site.

The provisions of this plan apply to Shannon & Wilson personnel who will potentially be exposed to safety and/or health hazards during this investigation. Shannon & Wilson employees are covered under its Corporate Safety and Health Program. General safety and health requirements described in that program will be met. Each Shannon & Wilson employee on the site will complete the personal acknowledgement form documenting they have read and understand this SSHP and agree to abide by its requirements. A copy of this SSHP will be kept on-site throughout the duration of sampling operations.

B.1. SITE HAZARD ANALYSIS

There are two categories of hazards that may occur during the field work: potential chemical exposure hazards and physical hazards associated with site characterization activities. These hazards are discussed below.

B.1.1 Chemical-Exposure Hazards

Contaminated water may be encountered during site exploration activities. PFAS are believed to be the primary contaminants of potential concern and may be encountered in water at unknown concentrations.

Shannon & Wilson personnel will implement skin protection when they are to contact potentially contaminated soil or water. Field personnel will wear work gloves or nitrile gloves as needed. Field personnel will not require respiratory protection based on the current understanding of site conditions and scope of services.

B.1.2 Physical Hazards

Primary physical hazards associated with site characterization activities include temperature stress; lifting, slipping, tripping, falling; and risk of eye injuries. In addition, wildlife may be a hazard in forested areas around the airport. The best means of protection against accidents related to physical hazards are careful control of equipment activities in the planned work area and use of experienced and safety- and health-trained field personnel.

Field personnel will not enter confined spaces for site characterization activities, nor will they enter trenches or excavations greater than four feet in depth.

B.1.2.1 Temperature Stress

Wearing personal protective equipment (PPE) may put a worker at risk of developing heat stress; however, since the field work will be conducted during cooler months the risk of heat stress is considered low. Cold stress or injury due to hypothermia will be guarded against by wearing appropriate clothing, having warm shelter available, scheduling rest periods, adequate hydration, and self-monitoring physical and mental conditions.

B.1.2.2 Lifting Hazards

Moving coolers of water samples or other heavy objects presents a lifting hazard. Personnel will use proper lifting techniques and obtain assistance when lifting objects weighing more than 40 pounds.

B.1.2.3 Slips, Trips, and Falls

The most common hazards on a job site are typically slips, trips, and falls. These hazards will be reduced through the following practices:

- Personnel will stay alert.
- All access-ways will be kept free of materials, supplies, and obstructions at all times.
- Tools and other materials will be located so as not to cause tripping or other hazards.
- Personnel should be aware of potential tripping hazards associated with vegetation, debris, and uneven ground.
- Personnel should be aware of limitations imposed by work clothing and PPE.

The project site may be inherently hazardous due to the potential presence of rain, snow, and ice, which can alter the character of the ground surface. The risk for slips, trips, and falls by site workers is increased due to wet or icy surfaces; therefore, workers will use caution when walking at the site.

B.1.2.4 Insects and Animals

During the summer months in Alaska, mosquitoes and other insects are common in areas predominantly covered with vegetation. Wearing PPE should be sufficient to protect site

workers. Animals such as moose and bears are also commonly seen in Alaska. If a large animal approaches the site, workers should keep their distance or seek shelter in their vehicles.

B.1.2.5 Congested Areas

The site investigation may at times require field personnel to work adjacent to or in roadways. Field personnel will observe the speed and frequency of traffic proximal to the work site. Appropriate cones, barricades, or signs to secure the work area will be used when required.

B.1.3 Other Hazards

Biological, ionizing radiation, and other hazards are not expected to be present. However, be aware of the surroundings and maintain safe work practices in accordance with Shannon & Wilson's Corporate Health & Safety Plan.

B.2. PERSONAL RESPONSIBILITIES, TRAINING, AND MEDICAL SURVEILLANCE

Below is a summary of the assignment of responsibilities, training requirements, and medical surveillance information for Shannon & Wilson personnel.

B.2.1 Assignment of Responsibilities

Shannon & Wilson is responsible for understanding and complying with the requirements of this SSHP. Following is a list of responsibilities of all Shannon & Wilson personnel working on the site:

- Review and follow this SSHP.
- Attend and participate in safety meetings.
- Take appropriate action as described in this SSHP regarding accidents, fires, or other emergency situations.
- Take all reasonable precautions to prevent injury to themselves and their fellow workers.
- Perform only those tasks they believe they can do safely, and immediately report any accidents or unsafe conditions to Shannon & Wilson's Project Manager or Office Health and Safety Manager.
- Halt work, by themselves or by others, when they observe an unsafe act or potentially unsafe working condition.

 Report accidents, illnesses, and near-misses to the local contact and to Shannon & Wilson's Fairbanks office Health and Safety Manager.

B.2.2 Personal Training

Shannon & Wilson personnel performing activities on this site and under this plan have completed the appropriate training requirements specified in 29 CFR 1910.120(e). Each individual has completed an annual eight-hour refresher-training course and/or initial 40-hour training course within the last year.

A personal acknowledgement form will be completed by field personnel prior to commencing field activities. This acknowledgment form will document that they have read and understand this SSHP.

B.2.3 Medical Surveillance Program

All field personnel performing activities on this site covered by this SSHP have undergone baseline and annual physical/medical examinations as part of Shannon & Wilson's Corporate Health and Safety Program. All field personnel are active participants in Shannon & Wilson's Medical Monitoring Program or in a similar program, which complies with 29 CFR 1910.120(f).

B.3. PERSONAL PROTECTIVE EQUIPMENT

PPE will be required during the course of the field work. PPE selection will be based primarily on work-task requirements and potential exposure. Personnel may wear the following, depending on the area of sampling:

- standard work clothes;
- reflective, high-visibility safety vest;
- safety-toe boots;
- safety glasses;
- hearing protection;
- gloves; and,
- hard hat.

Disposable nitrile gloves will be worn during any activity that may require dermal contact with potentially contaminated media.

B.4. DECONTAMINATION PROCEDURES

Equipment decontamination procedures are necessary for any reusable equipment that comes into contact with contaminated soil and/or water. Decontamination procedures will consist of a rinse with non-phosphate-based detergent, a second rinse with plain tap water, and a final rinse with distilled water. Sampling equipment and PPE that is expendable will be disposed of at the site or in a landfill off-site.

Shannon & Wilson will conduct all site characterization activities in Level D PPE. For this reason, personnel will not be decontaminated when leaving the work site unless gross visual contamination of protective clothing is present.

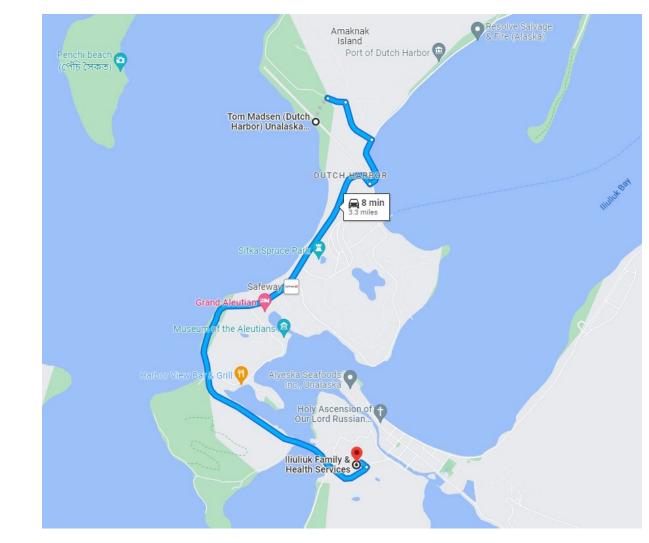
B.5. ACCIDENTS AND EMERGENCIES

Shannon & Wilson field personnel are current in first aid and cardiopulmonary resuscitation (CPR) training. At a minimum, the following site safety equipment and first aid supplies shall be available in the field:

- PPE and clothing specialized for known site hazards;
- first aid kit, including first aid booklet;
- portable eye wash;
- clean water in portable containers; and
- other decontamination supplies.

The primary emphasis of any health and safety plan is accident prevention. If an injury or illness occurs during the course of field work, the severity of the problem will dictate the level of response. Minor injuries or illness will be addressed with basic first aid measures as recommended by a registered nurse through Shannon & Wilson's corporate Medcor service (1-800-775-5866). More serious injuries will require assistance from the medical staff at the Iliuliuk Family & Health Services located at 34 Lavelle Ct, Unalaska, Alaska. The telephone number for the Clinic is (907) 581-1202 and the hours of operation are 8:30 a.m. to 6 p.m. Monday through Friday and 8:30 a.m. to 1 p.m. Saturday. See the map provided below for location. Field phones will be kept easily accessible in the case of an emergency.

DOT&PF Statewide PFAS Addendum 021-DUT-01 Initial Site Characterization FINAL General Work Plan Addendum



Shannon & Wilson's Corporate Health and Safety Program requires accident reporting when there is a site-related accident, near-miss incident, or medical emergency. If an employee is treated by medical personnel, the medical attendant will complete an Incident Medical Treatment Documentation form. Completion of an Alaska Department of Labor Report of Occupational Injury or Illness is also required within 10 days for any work-related injury or illness.

B.6. GENERAL SITE SAFETY REQUIREMENTS

The following measures are designed to augment the specific health and safety guidelines provided in this plan:

- Field personnel should avoid contact with potentially contaminated surfaces such as: walking through puddles or pools of liquid; kneeling on the ground; or leaning, sitting, or placing equipment on contaminated soil or containers.
- Field personnel will be familiar with procedures for initiating an emergency response.
- Hazard assessment is a continual process; personnel must be aware of their surroundings and any chemical/physical hazards present.
- Personnel in the exclusion area shall be the minimum number necessary to perform work tasks in a safe and efficient manner.
- The use of contact lenses is prohibited; soft lenses may absorb irritants, and all lenses concentrate irritants.
- Equipment contacting potentially contaminated soil or water must be decontaminated or properly discarded before leaving the site.

Field personnel will be familiar with the physical characteristics of the work site including wind direction, site access, and location of communication devices and safety equipment.

SITE SAFETY AND HEALTH PLAN PERSONAL ACKNOWLEDGEMENT FORM

DOT&PF STATEWIDE GENERAL WORK PLAN ADDENDUM 021-DUT-01: UNALASKA DUT SITE CHARACTERIZATION

I have reviewed this document and understand its contents and requirements. A copy of the above-referenced document has been made available to me. I agree to abide by the requirements of this Site Safety and Health Plan.

Signature

Name (printed)

Date

Representing

Important Information

About Your Geotechnical/Environmental Report

CONSULTING SERVICES ARE PERFORMED FOR SPECIFIC PURPOSES AND FOR SPECIFIC CLIENTS.

Consultants prepare reports to meet the specific needs of specific individuals. A report prepared for a civil engineer may not be adequate for a construction contractor or even another civil engineer. Unless indicated otherwise, your consultant prepared your report expressly for you and expressly for the purposes you indicated. No one other than you should apply this report for its intended purpose without first conferring with the consultant. No party should apply this report for any purpose other than that originally contemplated without first conferring with the consultant.

THE CONSULTANT'S REPORT IS BASED ON PROJECT-SPECIFIC FACTORS.

A geotechnical/environmental report is based on a subsurface exploration plan designed to consider a unique set of project-specific factors. Depending on the project, these may include the general nature of the structure and property involved; its size and configuration; its historical use and practice; the location of the structure on the site and its orientation; other improvements such as access roads, parking lots, and underground utilities; and the additional risk created by scope-of-service limitations imposed by the client. To help avoid costly problems, ask the consultant to evaluate how any factors that change subsequent to the date of the report may affect the recommendations. Unless your consultant indicates otherwise, your report should not be used (1) when the nature of the proposed project is changed (for example, if an office building will be erected instead of a parking garage, or if a refrigerated warehouse will be built instead of an unrefrigerated one, or chemicals are discovered on or near the site); (2) when the size, elevation, or configuration of the proposed project is altered; (3) when the location or orientation of the proposed project is modified; (4) when there is a change of ownership; or (5) for application to an adjacent site. Consultants cannot accept responsibility for problems that may occur if they are not consulted after factors that were considered in the development of the report have changed.

SUBSURFACE CONDITIONS CAN CHANGE.

Subsurface conditions may be affected as a result of natural processes or human activity. Because a geotechnical/environmental report is based on conditions that existed at the time of subsurface exploration, construction decisions should not be based on a report whose adequacy may have been affected by time. Ask the consultant to advise if additional tests are desirable before construction starts; for example, groundwater conditions commonly vary seasonally.

Construction operations at or adjacent to the site and natural events such as floods, earthquakes, or groundwater fluctuations may also affect subsurface conditions and, thus, the continuing adequacy of a geotechnical/environmental report. The consultant should be kept apprised of any such events and should be consulted to determine if additional tests are necessary.

MOST RECOMMENDATIONS ARE PROFESSIONAL JUDGMENTS.

Site exploration and testing identifies actual surface and subsurface conditions only at those points where samples are taken. The data were extrapolated by your consultant, who then applied judgment to render an opinion about overall subsurface conditions. The actual interface between materials may be far more gradual or abrupt than your report indicates. Actual conditions in areas not sampled may differ from those predicted in your report. While nothing can be done to prevent such situations, you and your consultant can work together to help reduce their impacts. Retaining your consultant to observe subsurface construction operations can be particularly beneficial in this respect.

A REPORT'S CONCLUSIONS ARE PRELIMINARY.

The conclusions contained in your consultant's report are preliminary, because they must be based on the assumption that conditions revealed through selective exploratory sampling are indicative of actual conditions throughout a site. Actual subsurface conditions can be discerned only during earthwork; therefore, you should retain your consultant to observe actual conditions and to provide conclusions. Only the consultant who prepared the report is fully familiar with the background information needed to determine whether or not the report's recommendations based on those conclusions are valid and whether or not the contractor is abiding by applicable recommendations. The consultant who developed your report cannot assume responsibility or liability for the adequacy of the report's recommendations if another party is retained to observe construction.

THE CONSULTANT'S REPORT IS SUBJECT TO MISINTERPRETATION.

Costly problems can occur when other design professionals develop their plans based on misinterpretation of a geotechnical/environmental report. To help avoid these problems, the consultant should be retained to work with other project design professionals to explain relevant geotechnical, geological, hydrogeological, and environmental findings, and to review the adequacy of their plans and specifications relative to these issues.

BORING LOGS AND/OR MONITORING WELL DATA SHOULD NOT BE SEPARATED FROM THE REPORT.

Final boring logs developed by the consultant are based upon interpretation of field logs (assembled by site personnel), field test results, and laboratory and/or office evaluation of field samples and data. Only final boring logs and data are customarily included in geotechnical/environmental reports. These final logs should not, under any circumstances, be redrawn for inclusion in architectural or other design drawings, because drafters may commit errors or omissions in the transfer process.

To reduce the likelihood of boring log or monitoring well misinterpretation, contractors should be given ready access to the complete geotechnical engineering/environmental report prepared or authorized for their use. If access is provided only to the report prepared for you, you should advise contractors of the report's limitations, assuming that a contractor was not one of the specific persons for whom the report was prepared, and that developing construction cost estimates was not one of the specific purposes for which it was prepared. While a contractor may gain important knowledge from a report prepared for another party, the contractor should discuss the report with your consultant and perform the additional or alternative work believed necessary to obtain the data specifically appropriate for construction cost estimating purposes. Some clients hold the mistaken impression that simply disclaiming responsibility for the accuracy of subsurface information always insulates them from attendant liability. Providing the best available information to contractors helps prevent costly construction problems and the adversarial attitudes that aggravate them to a disproportionate scale.

READ RESPONSIBILITY CLAUSES CLOSELY.

Because geotechnical/environmental engineering is based extensively on judgment and opinion, it is far less exact than other design disciplines. This situation has resulted in wholly unwarranted claims being lodged against consultants. To help prevent this problem, consultants have developed a number of clauses for use in their contracts, reports, and other documents. These responsibility clauses are not exculpatory clauses designed to transfer the consultant's liabilities to other parties; rather, they are definitive clauses that identify where the consultant's responsibilities begin and end. Their use helps all parties involved recognize their individual responsibilities and take appropriate action. Some of these definitive clauses are likely to appear in your report, and you are encouraged to read them closely. Your consultant will be pleased to give full and frank answers to your questions.

The preceding paragraphs are based on information provided by the ASFE/Association of Engineering Firms Practicing in the Geosciences, Silver Spring, Maryland