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October 13, 2020

Michael D. Staton, L.G.
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**Re: Request for Modifications to Confirmational Groundwater Monitoring Program,
SeaTac Development Site (MasterPark Lot C), SeaTac, Washington**

Dear Michael Staton:

The Department of Ecology (Ecology) has reviewed your letter dated September 23, 2020 that proposes modifications to the confirmational groundwater monitoring program at the SeaTac Development site. The proposal would shut down the in-situ air sparging/soil vapor extraction (IAS/SVE) system and implement a modified program of confirmational monitoring and monitored natural attenuation (MNA) at the site.

In-situ Air Sparging/Soil Vapor Extraction (IAS/SVE) remedial system shutdown

Under the Final Cleanup Action Plan (FCAP) and Compliance Monitoring Plan (CMP), the IAS/SVE system and concurrent performance monitoring was to operate for an estimated five year time frame. Afterwards, an additional five years of confirmational groundwater monitoring with MNA would be implemented. While the IAS/SVE system has operated for an accumulated four years and seven months--below the estimated duration in the FCAP and CMP--significant reductions in contaminant concentrations indicate that continued operation may not be necessary and the next stage of confirmational monitoring may be started.

Furthermore, the cleanup documents provide a management framework for adjusting system operation. Under Section 5.3.5.2 (Performance Monitoring) of the FCAP and Table 1 in the CMP, the five years of operation is an estimated timeframe. Likewise, Section 3.2 (Implementation Schedule) of the August 2012 Engineering Design Report (EDR) states: "The treatment operating time (i.e., time to achieve cleanup levels) is estimated to be approximately 5 years."

Modifications to Compliance Monitoring Program

In Sections 5.3.5.3 (Confirmational Monitoring) and 5.3.5.4 (Groundwater Monitoring Program Summary) of the FCAP, confirmational monitoring begins after the IAS-SVE system is turned off and will be implemented for five years thereafter, or until four consecutive events of groundwater monitoring results demonstrate that contaminant concentrations at the Site no longer exceed cleanup levels, whichever comes first. See also Table 1 (Compliance Monitoring Sampling Matrix) in the CMP describing in detail the monitoring schedule and well network to be sampled.

Under the proposed modifications, the period of confirmational monitoring will proceed upon shutdown of the IAS-SVE system, as originally planned in the FCAP. The proposal would also reduce the number of wells being monitored because some of the site wells have been non-detect or below cleanup levels since installation or for over four quarters, which indicate that they no longer need to be part of the confirmational monitoring well network due to the remedial actions.

Section XV (Amendment of Decree) of the 2012 Consent Decree allows for minor changes to the work to be performed without amending the Decree. Ecology believes the proposed modifications to be minor and justified by the documented reductions in plume concentrations and size, SVE-AS system performance, and advanced stage of remediation at this site.

Next Steps

Ecology concurs with the proposed modifications, as follows:

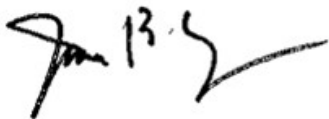
1. The IAS/SVE system (which was deactivated in July 2020 in order to conduct summer groundwater monitoring) shall remain deactivated for confirmational groundwater monitoring designed to evaluate the potential rebound of contaminant concentrations and further remediation by MNA when the system is turned off. Furthermore, Ecology understands that the system may be close to the point of diminishing returns on contaminant recovery and remediation effectiveness. If so, please provide the relevant supporting information such as cumulative mass recovery curves showing asymptotic trends, or equivalent graphs that show system performance is at a point where its effectiveness in remediating groundwater contamination is nearing its limit.
2. Ecology understands that the IAS/SVE system shall not be decommissioned - only deactivated - and may be restarted as part of contingency or corrective actions should significant contamination rebound occur during confirmational groundwater monitoring.
3. Ecology concurs with the proposal to eliminate monitoring wells MW-06, MW-19, MW-20, and MW-21 from the confirmational groundwater sampling program that is described in the Compliance Monitoring Plan (CMP; Appendix E of the Cleanup Action Plan). Ecology understands that these wells shall not be decommissioned from the well network at the site.

4. The wells that will be sampled in accordance with the confirmational monitoring schedule in Table 1 of the CMP are: MW-07, MW-9, MW-12, MW-13, MW-15, MW-16, MW-17A, MW-18, MW-22, and PORT-MW-B.
5. The following modification to the CMP will be implemented: MW-13 shall be added to the program of confirmational monitoring for Years 2 - Completion (semi-annually).
6. For wells located within the South 160th Street right-of-way, Ecology concurs with the proposal to sample monitoring well PORT-MW-B in accordance with the CMP, but sample wells MW-15 and MW-22 annually (only in the January events).
7. In accordance with Table 1 of the CMP, the groundwater samples from MW-12, MW-16, MW-18, MW-22, and PORT-MW-B shall also be analyzed for MNA parameters such as Dissolved Oxygen (DO), Oxidation-reduction potential (ORP), nitrate, dissolved iron, manganese, sulfate, methane, alkalinity, and TOC.
8. Ecology concurs with beginning the confirmational monitoring in October 2020. The monitoring will be on a quarterly basis for one year and on a semiannual basis in the succeeding years (January and July), in accordance with the CMP.
9. Please find attached a revised Table 1 (Compliance Monitoring Sampling Matrix) which documents the modifications to the confirmational monitoring program.

Ecology has determined that the request constitutes a minor change that will not require an amendment to the consent decree.

Please don't hesitate to contact me if you have any questions or concerns.

Respectfully yours,



Jerome B. Cruz
Site Manager
Toxics Cleanup Program, NWRO

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