# **Compliance Monitoring Plan Addendum**

Former Shell Oil Tank Farm Site Anacortes, Washington Ecology Consent Decree No. 14-2-01249-0

for

Washington State Department of Ecology on Behalf of Port of Anacortes

July 14, 2015



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## **Compliance Monitoring Plan Addendum**

# Former Shell Oil Tank Farm Site Anacortes, Washington Ecology Consent Decree No. 14-2-01249-0

File No. 5147-012-07

July 14, 2015

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#### **INTRODUCTION**

This document is being presented as an addendum to the Washington State Department of Ecology (Ecology) approved Compliance Monitoring Plan (CMP; GeoEngineers, 2014a) for post-construction groundwater monitoring at the Former Shell Oil Tank Farm Site (Site). The Site is formally referenced in the Ecology databases as the Former Shell Oil Tank Farm Site (Ecology Facility Site Identification No. 4781157) and is generally located between 13<sup>th</sup> and 14<sup>th</sup> Streets west of Q Avenue in Anacortes, Washington (Figure 1). The Site is being managed by Ecology as part of the Fidalgo and Padilla Bay component of the Puget Sound Initiative program.

Pursuant to the Cleanup Action Plan (CAP; Ecology, 2014), Engineering Design Report (EDR; GeoEngineers, 2014b) and Consent Decree No. 14-2-01249-0 filed with the Skagit County Superior Court on July 14, 2014, post-construction groundwater monitoring will be performed by the Port of Anacortes (Port) to verify the effectiveness of the cleanup action implemented for the Site. The primary purpose of this document is to describe the post-construction groundwater monitoring activities that will be performed at the Site and is to be used in conjunction with the Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) included as appendices to the CMP. Specific details of the implemented cleanup action are presented in the Construction Completion (As-Built) Report (GeoEngineers, 2015). Post-construction groundwater monitoring activities are presented below.

#### **POST-CONSTRUCTION GROUNDWATER MONITORING**

Post-construction groundwater monitoring will be performed at the Site to monitor groundwater conditions to evaluate the effectiveness of the cleanup action. Groundwater samples will be analyzed for indicator hazardous substances listed in Table 1 to ensure that groundwater downgradient of Site, specifically the area in which residual soil contamination remains in place following implementation of the cleanup action, meet the performance criteria established for the Site. In accordance with the CAP and EDR, existing monitoring wells at the Site will be sampled on a quarterly basis for at least one year. Further monitoring requirements will be evaluated by Ecology following completion of the initial year of monitoring.

The following sections describe the performance criteria, monitoring well locations, and sampling procedures for the post-construction groundwater monitoring program.

#### **Performance Criteria**

In accordance with the CMP, the Site is considered to be in compliance when contaminant concentrations for indicator hazardous substances in groundwater including, gasoline-, diesel- and heavy oil-range petroleum hydrocarbons, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), benzene and cadmium are less than site-specific cleanup levels (Table 1) at the point of compliance for four consecutive monitoring events. If one or more of the indicator hazardous substances are detected at concentrations exceeding the site-specific cleanup levels presented in Table 1, the Port and Ecology, based on discussions between the Port and Ecology and implemented at the approval of Ecology, will determine the approach and necessary measures to address exceedances and meet cleanup objectives. At the least, additional compliance groundwater monitoring becomes necessary based on the results of the four initial monitoring events, the sampling location, frequency and indicator hazardous substance will be determined based on discussions between the Port and Ecology and implemented at the approval of Ecology.



#### **Monitoring Well Network**

Existing groundwater monitoring wells GEI-MW-2, GEI-MW-4, GEI-MW-5 and GEI-MW-7 will be used to evaluate groundwater conditions within and/or downgradient of residual soil contamination. Monitoring wells GEI-MW-2, GEI-MW-4 and GEI-MW-5 are positioned downgradient of the remaining soil contamination between the Site and Fidalgo Bay. Monitoring well GEI-MW-7 is positioned at the conditional point of compliance along the Fidalgo Bay shoreline groundwater/surface water interface.

The final limits of excavation completed to remove contaminated soil, approximate area of residual soil contamination remaining in place following implementation of the cleanup action and monitoring wells being utilized to evaluate post-construction groundwater conditions are shown on Figure 2. Monitoring well coordinates are presented in Table 2. Well construction details are summarized in Table 3. Well Construction logs for monitoring wells GEI-MW-2, GEI-MW-4, GEI-MW-5 and GEI-MW-7 are presented in Appendix A.

#### **Groundwater Sampling and Analysis**

Groundwater samples will be collected from each monitoring well and analyzed for indicator hazardous substances presented in Table 1 to evaluate whether residual soil contamination is adversely impacting groundwater at the Site. Groundwater sampling procedures are summarized below.

#### **Groundwater Sampling Procedure**

Groundwater levels will be measured at each monitoring well location prior to purging and sample collection during each monitoring event to the nearest 0.01 foot prior to sampling using an electric water level indicator (e-tape). The water levels will be recorded relative to the surveyed casing rim elevations. Monitoring well casing rim elevations are summarized in Table 3.

Monitoring well GEI-MW-7 located within the zone of tidal influence (i.e., 200 feet from the shoreline based on previous tidal studies) will be sampled within one hour of the lowest day-time tide level for each sampling event to the extent practicable. Groundwater samples will be obtained using low-flow/low-turbidity sampling techniques to minimize the suspension of sediment in groundwater samples. Using a peristaltic pump and dedicated polyethylene tubing, groundwater will be pumped from the well at a rate not to exceed 0.5 liter per minute to minimize drawdown. The base of the tubing (i.e., intake) will be positioned at the approximate midpoint of the observed water column. A Horiba U-50 series water quality measuring unit (or equivalent) with flow-through-cell will be used to monitor the following water quality parameters during purging:

- Electrical conductivity (EC),
- Dissolved oxygen (DO),
- Acidity (pH),
- Total dissolved solids (TDS),
- Oxygen reduction potential (ORP),
- Turbidity,
- Salinity, and
- Temperature.



Water samples will be obtained after these parameters vary by less than 10 percent on three consecutive measurements (i.e., ambient groundwater conditions). The stabilized field measurements will be documented in the field log. Following well purging, the flow-through cell will be disconnected and groundwater samples will be collected in laboratory-prepared containers. Groundwater will be collected from the new and existing monitoring wells and submitted to an Ecology-certified laboratory for analyses of indicator hazardous substances listed above. Both field-filtered and unfiltered samples for metals (cadmium) analysis will be collected. Reusable sampling equipment that comes in contact with groundwater will be decontaminated before each use. Decontamination procedures for this equipment are described in the QAPP (Appendix A of the CMP).

The samples will be placed into a cooler with ice and logged on chain-of-custody forms following the procedures described in the QAPP. Purge water removed from the monitoring wells and decontamination water generated during all sampling activities will be stored on Site in labeled and sealed 55-gallon drums. The drums will be stored temporarily at a secure location on Port property pending receipt of analytical results and off-site disposal at a permitted facility. Incidental waste generated during sampling activities includes items such as gloves, plastic sheeting, sample tubing, paper towels and similar expended and discarded field supplies. These materials are considered *de minimis* (Ecology, 2006) and will be disposed of in a local trash receptacle or county disposal facility.

#### **Chemical Analysis**

Water samples collected from monitoring wells GEI-MW-2, GEI-MW-4, GEI-MW-5 and GEI-MW-7 will be submitted to an Ecology accredited laboratory for one or more of the following:

- Gasoline-range petroleum hydrocarbons by NWTPH-Gx;
- Diesel- and heavy oil-range petroleum hydrocarbons by NWTPH-Dx;
- Benzene by EPA Method 8260;
- Total and dissolved cadmium by EPA Method 6010; and
- cPAHs by EPA Method 8270SIM.

Table 4 presents the sampling and analysis plan for post-construction groundwater monitoring. Sample handling procedures, including labeling, container and preservation are described in the QAPP (Appendix A of the CMP). To measure the precision and consistency of laboratory analytical procedures and methods, as well as the consistency of the sampling techniques used by field personnel, a minimum of one duplicate sample will be collected during each monitoring event. In addition, a trip blank prepared by the testing laboratory will be analyzed for gasoline and benzene at a rate of one trip blank per cooler containing samples for gasoline and benzene analysis.

### **Monitoring Well Decommissioning**

Upon receipt of approval from Ecology that the compliance monitoring is complete and the monitoring wells will no longer be used, monitoring wells will be decommissioned by a well driller licensed in the State of Washington in accordance with Ecology requirements (WAC 173-160-460).



#### **QUALITY ASSURANCE AND CONTROL**

Quality assurance/quality control (QA/QC) procedures and standards that will be implemented during postconstruction groundwater monitoring activities are presented in the QAPP (Appendix A of the CMP). The purpose of this document is to describe the objectives, field sampling procedures, organization, and specific quality assurance and quality control activities designed to achieve data quality goals established for the project.

#### **HEALTH AND SAFETY**

Groundwater monitoring and sampling activities will be performed in accordance with the requirements of the Washington Industrial Safety and Health Act (Revised Code of Washington [RCW] 49.17) and the Federal Occupational Safety and Health Act (29 CFR 1910, 1926). These regulations include requirements that workers are to be protected from exposure to contaminants. A Site HASP describing actions that will be taken to protect the health and safety of GeoEngineers, Inc.'s (GeoEngineers) personnel is provided in Appendix B of the CMP.

#### REPORTING

The results of the post-construction groundwater monitoring will be provided to Ecology following each monitoring event as part of the project progress reporting. After completion of the four initial quarterly groundwater monitoring events, a Post-Construction Groundwater Monitoring Report summarizing the results of each quarterly groundwater monitoring event will be submitted to Ecology for review. Data generated as part of the groundwater monitoring program will be submitted to Ecology in the format required by Environmental Information Management (EIM) Policy 840 following completion of data review and validation.

#### LIMITATIONS

This report has been prepared for the exclusive use of the Port of Anacortes, their authorized agents and regulatory agencies in their evaluation of the Former Shell Oil Tank Farm Site in Anacortes, Washington. No other party may rely on the product of our services unless we agree in advance and in writing to such reliance.

Any electronic form, facsimile or hard copy of the original document (email, text, table, and/or figure), if provided, and any attachments are only a copy of the original document. The original document is stored by GeoEngineers, Inc. and will serve as the official document of record.

#### REFERENCES

GeoEngineers, Inc. (GeoEngineers, 2014a), "Engineering Design Report, Former Shell Oil Tank Farm, Anacortes, Washington," GEI File No. 5147 012-04, prepared for the Washington State Department of Ecology on behalf of Port of Anacortes, July 29, 2014.



- GeoEngineers, Inc. (GeoEngineers, 2014b), "Compliance Monitoring Plan, Former Shell Oil Tank Farm, Anacortes, Washington," GEI File No. 5147 012-04, prepared for the Washington State Department of Ecology on behalf of Port of Anacortes, July 29, 2014.
- GeoEngineers, Inc. (GeoEngineers, 2015), "Construction Completion (As-Built) Report, Former Shell Oil Tank Farm, Anacortes, Washington, Ecology Consent Decree No. 14-2-01249-0," GEI File No. 5147 012-07, prepared for the Washington State Department of Ecology on behalf of Port of Anacortes, June 25, 2015.
- Washington State Department of Ecology (Ecology, 2014b). "Cleanup Action Plan (CAP), Former Shell Oil Tank Farm Site, Anacortes, Washington," dated February 3, 2014.



# Table 1

### Cleanup Levels for Indicator Hazardous Substances Former Shell Oil Tank Farm Site

Anacortes, Washington

Indicator Hazardous	Groundwater Cleanup Level
Substances	(µg/L)
Petroleum Hydrocarbons	
Gasoline-Range	800/1,000 <sup>2</sup>
Diesel-Range	500
Heavy Oil-Range	500
Volatile Organic Compound (VOC)	
Benzene	23
Carcinogenic Polycyclic Aromatic Hydrocarbons	(cPAHs)
Benzo(a)anthracene	0.02
Chrysene	0.02
Benzo(b)fluoranthene	0.02
Benzo(k)fluoranthene	0.018
Benzo(a)pyrene	0.018
Indeno(1,2,3-cd)pyrene	0.018
Dibenz(a,h)anthracene	0.018
Total cPAHs (TEC)	0.1
Metals	
Cadmium	8.0

#### Notes:

 $^{1}\mbox{Cleanup}$  level is 30 mg/kg when benzene is present.

 $^2\mbox{Cleanup}$  level is 800  $\mu\mbox{g/L}$  when benzene is present.

 $\mu$ g/L = micrograms per liter

TEC = toxicity equivalency concentration



# Table 2Groundwater Monitoring Well CoordinatesFormer Shell Oil Tank Farm<br/>Anacortes, Washington

				Latitude and Long	gitude Coodinates	Washington State Planes North Coordinates (NAD83)			
Monitoring Well <sup>1</sup>	onitoring Date Ins Well <sup>1</sup> Installed		Ecology Well Identification	Latitude (DMS)	Longitude (DMS)	Northing (feet)	Easting (feet)		
GEI-MW-2	2/9/2012	GeoEngineers	BHM-141	48°30'39.8984"	-122°36'40.3647"	556187.51	1209502.34		
GEI-MW-4	2/9/2012	GeoEngineers	BHM-144	48°30'41.7669"	-122°36'40.3141"	556376.73	1209510.12		
GEI-MW-5	2/10/2012	GeoEngineers	BHM-146	48°30'41.3563"	-122°36'39.0529"	556333.16	1209594.05		
GEI-MW-7	2/10/2012	GeoEngineers	BHM-147	48°30'42.4281"	-122°36'35.3598"	556436.01	1209845.16		

Notes:

<sup>1</sup>Monitoring well locations are shown on Figure 2.

NAD83 = 1983 North American Datum



# Table 3Groundwater Monitoring Well Completion DataFormer Shell Oil Tank FarmAnacortes, Washington

Monitoring Well <sup>1</sup>	Date Installed	Installed By	Ecology Well Identification	Ground Elevation (feet)	Top of Casing Elevation (feet)	Bottom of Casing Elevation (feet)	Total Well Depth (feet bgs)	Casing Diameter (inches)	Screen Interval (feet bgs)	Screen Specifications
GEI-MW-2	2/9/2012	GeoEngineers	BHM-141	13.4	12.98	-2.02	15	2	5 to 15	2-inch Schedule 40 PVC 0.010-inch slot
GEI-MW-4	2/9/2012	GeoEngineers	BHM-144	13.36	12.98	-2.02	15	2	5 to 15	2-inch Schedule 40 PVC 0.010-inch slot
GEI-MW-5	2/10/2012	GeoEngineers	BHM-146	13.05	12.67	-0.33	13	2	5 to 15	2-inch Schedule 40 PVC 0.010-inch slot
GEI-MW-7	2/10/2012	GeoEngineers	BHM-147	11.99	11.65	-8.35	20	2	5 to 20	2-inch Schedule 40 PVC 0.010-inch slot

Notes:

<sup>1</sup>Monitoring well locations are shown on Figure 2.

All borings were installed using hollow-stem auger (HAS) drilling methods.

All elevations referenced to Mean Lower Low Water (MLLW).

bgs = below ground surface

PVC = polyvinyl chloride



# Table 4Post-Construction Groundwater Sampling and Analysis PlanFormer Shell Oil Tank Farm<br/>Anacortes, Washington

Monitoring Well <sup>1</sup>	Gasoline-Range Hydrocarbons (NWTPH-G)	Diesel-Range Hydrocarbons (NWTPH-Dx)	Heavy Oil-Range Hydrocarbons (NWTPH-Dx)	Benzene (EPA 8260)	Total Cadmium (EPA 6010)	Dissolved Cadmium (EPA 6010)
GEI-MW-2	Х	Х	Х	Х		
GEI-MW-4	Х	Х	Х	Х		
GEI-MW-5 <sup>2</sup>	Х	Х	Х	Х	Х	Х
GEI-MW-7	Х	Х	Х	Х		

#### Notes:

<sup>1</sup>Monitoring well locations are shown on Figure 2.

<sup>2</sup>A field duplicate sample will be obtained from this location during each monitoring event.

EPA = Environmental Protection Agency











# APPENDIX A Well Completion Logs

M	AJOR DIVIS	IONS	SYMB	OLS	TYPICAL
				LETTER	
	GRAVEL	CLEAN GRAVELS		GW	SAND MIXTURES
	GRAVELLY SOILS	(LITTLE OR NO FINES)		GP	POORLY-GRADED GRAVELS, GRAVEL - SAND MIXTURES
COARSE GRAINED	MORE THAN 50% OF COARSE	GRAVELS WITH FINES		GM	SILTY GRAVELS, GRAVEL - SAND - SILT MIXTURES
30123	FRACTION RETAINED ON NO. 4 SIEVE	(APPRECIABLE AMOUNT OF FINES)		GC	CLAYEY GRAVELS, GRAVEL - SAND - CLAY MIXTURES
MORE THAN 50%	SAND	CLEAN SANDS		SW	WELL-GRADED SANDS, GRAVELLY SANDS
RETAINED ON NO. 200 SIEVE	AND SANDY SOILS	(LITTLE OR NO FINES)		SP	POORLY-GRADED SANDS, GRAVELLY SAND
	MORE THAN 50% OF COARSE FRACTION	SANDS WITH FINES		SM	SILTY SANDS, SAND - SILT MIXTURES
	PASSING NO. 4 SIEVE	(APPRECIABLE AMOUNT OF FINES)		SC	CLAYEY SANDS, SAND - CLAY MIXTURES
				ML	INORGANIC SILTS, ROCK FLOUR, CLAYEY SILTS WITH SLIGHT PLASTICITY
	SILTS AND CLAYS	LIQUID LIMIT LESS THAN 50		CL	INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, GRAVELLY CLAYS, SANDY CLAYS, SILTY CLAYS, LEAN CLAYS
SOILS			m	OL	ORGANIC SILTS AND ORGANIC SILTY CLAYS OF LOW PLASTICITY
MORE THAN 50% PASSING NO. 200 SIEVE				мн	INORGANIC SILTS, MICACEOUS OR DIATOMACEOUS SILTY SOILS
	SILTS AND CLAYS	LIQUID LIMIT GREATER THAN 50		СН	INORGANIC CLAYS OF HIGH PLASTICITY
			huh	ОН	ORGANIC CLAYS AND SILTS OF MEDIUM TO HIGH PLASTICITY
Н	GHLY ORGANIC	SOILS		PT	PEAT, HUMUS, SWAMP SOILS WITH HIGH ORGANIC CONTENTS
)1E: Multiple	Sample	ised to indicate bo r Symbol D -inch I.D. split	escriptio barrel	ual soil c ons	lassifications
	Sta	ndard Penetra	tion Test	(SPT)	
	Pis	ton			
	Dir	ect-Push			
	Bul	lk or grab			
Blow of blo dista	count is reco ows required nce noted). trop.	orded for drive I to advance sa See exploratio	en sample ampler 12 on log for l	rs as th inches namme	e number (or r weight

#### DITIONAL MATERIAL SYMBOLS

SYM	BOLS	TYPICAL					
GRAPH	LETTER	DESCRIPTIONS					
	СС	Cement Concrete					
	AC	Asphalt Concrete					
	CR	Crushed Rock/ Quarry Spalls					
	TS	Topsoil/ Forest Duff/Sod					

- Measured groundwater level in exploration, well, or piezometer
- Groundwater observed at time of exploration
- Perched water observed at time of exploration
- Measured free product in well or piezometer

#### **Graphic Log Contact**

- Distinct contact between soil strata or geologic units Approximate location of soil strata
- change within a geologic soil unit

#### **Material Description Contact**

- Distinct contact between soil strata or geologic units
- Approximate location of soil strata change within a geologic soil unit

#### Laboratory / Field Tests

- Percent fines
- Atterberg limits
- Chemical analysis
- Laboratory compaction test
- Consolidation test
- **Direct shear**
- Hydrometer analysis
- **Moisture content** Moisture content and dry density
- Organic content
- Permeability or hydraulic conductivity
- Pocket penetrometer
- Sieve analysis
- Triaxial compression
- Unconfined compression
- Vane shear

#### **Sheen Classification**

- No Visible Sheen
- Slight Sheen
- Moderate Sheen **Heavy Sheen**
- Not Tested

r understanding of subsurface conditions. vere made; they are not warranted to be





Project Number: 5147-012-02

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> Figure B-3 Sheet 1 of 1



Project Number: 5147-012-02

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> Figure B-5 Sheet 1 of 1



Dril	StartEndTotal20Drilled2/10/20122/10/2012Depth (ft)20									Logged By AJ Checked By RST	Driller Cascad	le Drilling, L	P	P Drilling Method Hollow Stem Auger		
Ham Data	nmer a			N/A	<b>\</b>				Dri Eq	ling uipment	CME 75			g agenc	y well number: BHM1	<b>47</b> to a depth of 20 (ft)
Surf Vert	face Ele tical Dat	vation (ft) um	)	1 M	2.0 LLW				To Ele	Top of Casing Elevation (ft) 11.7			Groundwater Depth to			
Eas Nort	Easting (X) 1209845.159 Hor Northing (Y) 556436.0145 Dat					Horizontal Datum NAD83			Date Measured         Water ( Water ( 5.2			Elevation (ft) 6.50				
Not	Notes: Air knife from 0 to 5 feet. No samples obtained							obtai	ned	soil descriptions base	d on drill cuttings.	PID malfund	tion - No	head s	space vapor reading	5.
	FIELD DATA														WELL	LOG
(feet)	et)	(ii) b	Ŧ	sample	ame	lel	og		tion	N	ATERIAL			e)		Steel surface
evation	pth (fee	erval	ws/foo	llected 3	mple N	ater Lev	aphic L	dno	assifica	DES	SCRIPTION		een	adspac		monument
Ë	o De	Re	Bic	ů	Sa	Š	Ö	ۍ A	Ö C	3 inches asphalt			l sh	-He K		
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- I	-	-								-			-			
	-	-								-			- ss			·
I8_ENVIRG	-	-								-			-			<ul> <li>40 PVC screen,</li> <li>0.01 inch slot</li> <li>width</li> </ul>
8.GDT/GE	-	-								-			-			
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2 Path:C:N						_		I	Lo	g of Monitori	ng Well GE	EI-MW-7	7			
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						Project Locati	un: Anacorte	es, vvash	ungton	I		Figure B-8				

Project: Former Shell Oil Tank Farm Project Location: Anacortes, Washington Figure B-8 Sheet 1 of 1 5147-012-02 Project Number:

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