

From: [Winslow, Frank \(ECY\)](#)
To: [Greg Peters](#)
Cc: [Branislav Jurista](#); [Cliff Schmitt](#)
Subject: RE: Compliance Sampling Plan - Thompson Field Site
Date: Tuesday, April 30, 2024 2:03:46 PM
Attachments: [image001.png](#)

Hi Greg,

Thank you for submitting your compliance soil sampling plan.

The plan appears to be sufficiently complete and the proposed confirmation soil sampling locations appear to make sense. The confirmation soil samples are proposed on a basis of one floor sample per 50 ft by 50 ft grid cell (approximately 35 floor samples) and 1 sidewall sample per 100 feet of sidewall (roughly 10 or so sidewall samples). The density of proposed floor and sidewall samples is significantly less than within Ecology's Remediation of Petroleum Contaminated Sites guidance (20 ft by 20 ft grid cell for floor samples, and 20 feet along sidewalls). However, the overall excavation is considerably larger than a typical UST excavation and the proposed number of sidewall and floor samples appear to be reasonable. Note that if any existing sampling results are to serve as a sidewall or floor confirmation location, then the excavation should extend to that location or depth.

Field screening may have limited utility for the CPAHs in soil. PID readings or soil staining are unlikely. However, there could be a color change with the fill soils containing CPAHs that could help guide the excavation extent. If so, documenting such color changes via photographs within the remedial action completion report would be helpful.

The 17 depicted performance samples on Figure 3 appear to be generally conceptual and illustrative except for sidewall sample locations. The actual number of performance samples will be based on soils needed for waste characterization purposes, and locations where floor or sidewall samples exceed the cleanup level and additional excavation is needed. Ecology's primary concern is demonstrating sufficiency of cleanup through sufficient floor and sidewall samples, and documenting proper disposal via waste disposal receipts. Hence, for your remedial action completion report, please include all results within a table, but shade the rows for all samples that were subsequently removed to make it easy to see the final compliance confirmation results. In addition, a plan map showing the locations, depths, and results from of all final compliance confirmation samples will be helpful.

If any soils are deemed uncontaminated and soil segregation takes place on Site, then stockpile soil sampling should be done consistent with Table 6.9 of Ecology's Remediation of Petroleum Contaminated Sites guidance. Compositing of soil samples to characterize stockpiles (including use of thorough sample homogenization), although discouraged in that guidance document, may make sense for characterizing CPAHs, as long as such composite soil sample results are well below the cleanup level. Our guidance suggests Category 1 reuse of soils would be acceptable for CPAH concentration < 0.05 mg/kg. In general, if any excavated soils are deemed uncontaminated, Ecology would advise that they either remain onsite or be disposed of at a permitted disposal facility.

Please let me know if you have any questions regarding this feedback.

Thanks, Frank

Frank P. Winslow, LHG

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From: Greg Peters <gpeters@farallonconsulting.com>
Sent: Tuesday, April 30, 2024 9:08 AM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Cc: Branislav Jurista <bjurista@farallonconsulting.com>; Cliff Schmitt <cschmitt@farallonconsulting.com>
Subject: Compliance Sampling Plan - Thompson Field Site

External Email

Frank,

Attached is the compliance sampling plan for the planned remedial excavation at the Thompson Field Site for you review.

Please reach out to with any questions.

Regards,

Greg Peters, Associate Environmental Scientist

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