



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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April 30, 2012

Mr. Gary Barklind
Shell Oil Products, US
Puget Sound Refinery
P.O. Box 622
Anacortes, WA 98221

Re: SWMU 11 Site – Proposed Modifications to Groundwater Sampling Plan

Dear Mr. Barklind:

We received your letter of March 12, 2012 requesting modification of the SWMU 11 site groundwater monitoring plan (RCRA Facility Permit Number WAD 009276197). SWMU 11 was used as an impounding basin and has free petroleum product found in the upper groundwater aquifer beneath the unit. Shell has been recovering petroleum from a groundwater extraction well at the unit for over 20 years. The amount of petroleum product recovered has decreased since the start of the project.

A review of the past three years of data collection in the wells surrounding the fluid recovery well indicates that the groundwater quality is slowly improving. Shell has proposed to:

1. Reduce the frequency of depth-to-groundwater data collection from quarterly to semi-annually. The data will be collected during the semi-annual groundwater sample collection events.
2. Reduce the sample analyte list and remove analysis for metals and semi-volatile constituents.
3. Sample groundwater semi-annually for Skinner List volatile range constituents (EPA 8260) and diesel range total petroleum hydrocarbons (NWTPH-Dx).
4. Continue to monitor free product in piezometer P-21.
5. Continue to use MW-59 as a groundwater recovery well and maintain the pump as needed.
6. Submit one annual report each year on the recovery system and monitoring wells.



Ecology has reviewed the data submitted and approves the changes in the monitoring plan as submitted. If you have any questions regarding this approval please contact me in Lacey, WA (360) 407-6949 or p.skyllingstad@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Skyllingstad", with a long horizontal flourish extending to the right.

Paul Skyllingstad
Industrial Section

PES:mw