**Responses to EPA’s Comments**

Remedial Investigation/Feasibility Study (RI/FS)

Comment #1: Noted

Comment #2:

i: Agree that colloidal particulate contaminant transport likely has a higher potential to settle out and impact sediments. Unfiltered PAH samples for groundwater will be taken in the future.

ii: Even though the concentrations in the monitoring well 76A showed a potential trend of increasing, the concentrations remained below MTCA cleanup levels.

Comment #3:

According to Model Toxics Control Act (MTCA), sediment pathway does not need to be evaluated if the groundwater is protecting surface water quality. At T30, the contaminants detected in the groundwater are below surface water quality standards when discharging to the surface water body East Waterway. Therefore, sediment pathway is not considered at risk. The groundwater will continue to be monitored during and after the proposed source removal cleanup action “air sparging and soil vapor extraction”.

Cleanup Action Plan (CAP)

Comment #1:

The soil cleanup level in Section 1.7 is the final cleanup criteria. The selected final soil cleanup action is that the contaminated soil will be left in place and capped under the pavement. There is no direct contact pathway. The groundwater in contact with contaminated soil will be remediated by the proposed cleanup action “air sparging /soil vapor extraction (AS/SVE) system”.

Comment #4:

The goal of the AS/SVE system is to remove the majority of the lighter fractions of the petroleum, such as BETX in the soil and groundwater. The system will be turned off when remediation levels are achieved or the system no longer removes and reduces contamination. System turn off is subject to Ecology approval. At this time, the AS/SVE system is not designed to biodegrade any remaining contamination.

Comment #5:

The 0.1 reduction in LNAPL saturation reflects a removal of LNAPL equivalent to approximately 10% of the total pore volume within the LNAPL impacted interval.

Comment #6:

The schedule in Section 4.1.5 will be revised to reflect more frequent sampling events at the CPOC wells. The detailed monitoring schedule will be presented in the CAP as the following:

Performance monitoring

1.       Performance monitoring will be conducted when the AS/SVE system (Phase I and II) is in operation and when the AS/SVE system is temporarily shut down.

3. Performance monitoring wells will be sampled semi-annually when the AS/SVE system is in operation and when the AS/SVE system is temporarily shut down.

4. The CPOC wells will be sampled biannually when the AS/SVE system is in operation and when the AS/SVE system is temporarily shut down.

5.      The AS/SVE system is estimated to be in operation for seven years. The system will be temporarily shut down, during which time semi-annually samples will be taken at the performance monitoring wells and biannually samples at CPOC wells for three years.

6. Interior monitoring wells will be sampled biannually when the AS/SVE system is in operation and when the AS/SVE system is temporarily shut down.

Compliance monitoring

Once both Phase I and Phase II AS/SVE system are permanently shut down, long term compliance monitoring begins.  The CPOC wells will be sampled annually for the first 5 year, semi-annually year 5-10, and every 5 year for year 10 and beyond.

Table 3-1 will be revised accordingly.

SEPA

Comment #1 - SEPA will be updated.