



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

September 7, 2017

Mr. William H. (Bill) Collins
Tidewater Terminal Company, Inc.
6305 Northwest Old Lower River Road
Vancouver, WA 98660

Re: Comments on Draft Compliance Monitoring Plan:

- **Site Name:** Tidewater Fuel Line Leak
- **Site Address:** 2900 Sacajawea Park Road, Pasco WA, 99301
- **Cleanup Site ID:** 2331
- **Facility/Site ID:** 39378684

Dear Mr. Collins:

Thank you for submitting the draft compliance monitoring plan (CMP) and the supporting sampling and analysis plan (SAP), the quality assurance plan (QAPP) and the health and safety plan (HSP) for review by the Department of Ecology (Ecology). Based on the Department's review of the draft plan we have the following comments on the documents:

Compliance Monitoring Plan, Ecology Comments

1. **Subsection 1.1, Statement of Work, first paragraph, 3rd row:** Please include a description of the planned passive bioremediation and describe how, when, and where the bioventing will take place. Please identify wells that are part of the passive venting effort in the CMP.
2. **Subsection 1.2, Site Description, 3rd paragraph, last line:** Please include a description when and where the Tidewater spill occurred that triggered the cleanup effort at the Tidewater Site.
3. **Subsection 1.3, Compliance Monitoring Requirements, 3rd paragraph, second line:** Please describe the institutional controls selected as part of the Remedial Alternative No.
4. **Subsection 1.3, Compliance Monitoring Requirements, 3rd paragraph, fourth line:** Since there is a Health and Safety Plan, protection monitoring will be required.
5. **Subsection 1.3, Compliance Monitoring Requirements, 3rd paragraph, last line:** A provision for when monitored natural attenuation (MNA) must be replaced by a more aggressive remedy is missing. What criteria will trigger a re-evaluation of the chosen site remediation option, MNA?



sources outside these four documents should to confirm and support information in these four documents only.

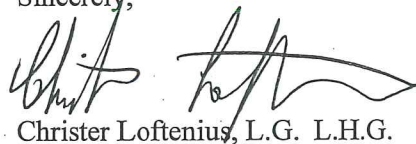
2. **Table B-5:** Please define the abbreviations SPCC and CCC shown in the table.
3. **Acronyms:** Is the MRL the same as PQL (practical quantification limit)?
4. **Subsection 1.4, Project Organization:** Please include an organization chart in the QAPP as a stand-alone figure.
5. **Subsection 1.4, Project Organization, fourth paragraph, Field Team, last line:** Ecology needs to be made aware of and approve any significant deviations.
6. **Subsection 7.1, Field QC Procedures, third line:** One batch of QC samples will be collected each sampling round. This should be changed throughout document and in other documents.

Health and Safety Plan, Ecology Comments

Site Map: Please include the complete route to the hospital from the site in the HSP.

If you have any questions about this request or how to complete your work plan, please contact Ecology's cleanup project manager, Christer Loftenius, at (509) 329-3543 or clof461@ecy.wa.gov Thank you for your cooperation, and we look forward to working with you.

Sincerely,



Christer Loftenius, L.G. L.H.G.
Site Manager
Toxics Cleanup Program, Eastern Region

cl:mk

Enclosure (1) Compliance Monitoring Plan, Sampling and Analysis Plan, Quality Assurance Project Plan and Health and Safety Plan with Ecology annotated comments

cc: Robert Martin – CH2M
Ecology Site File

FILE COPY