



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

May 4, 2016

FILE COPY

Mr. Jeffrey M. Baker
Tesoro Companies, Inc.
3450 South 344th Way, Suite 201
Auburn, WA 98001-9540

Re: Former Chevron Pipe Line Company Pasco Bulk Terminal Site - Ecology Comments on RI/FS Work Plan

Dear Mr. Baker:

On April 12, 2016, the Washington State Department of Ecology (Ecology) received an electronic copy of a document titled *Supplemental Remedial Investigation/Feasibility Study Workplan for the former Chevron Pipe Line Company Pasco Bulk Terminal on Sacajawea Road in Pasco, Washington*. The draft report was prepared by CEECON Testing, Inc. on behalf of Tesoro Logistics Operations LLC and submitted in an effort to fulfill the requirements of Agreed Order No. DE 12989. This document and associated appendices presents the work plan describing the work Tesoro intends to complete during the supplemental Remedial Investigation and Feasibility Study for the former Chevron Pipe Line Company Pasco Bulk Terminal Site (Site).

Ecology has reviewed the draft supplemental RI/FS Work Plan and associated appendices and exhibits and provides the following enclosed comments. In response to these comments and per Enforcement Order No. DE 12989, please provide a revised document to Ecology within 30 days of receipt of these comments. Please contact me at (509) 329-3543 if you have any questions regarding this letter.

Sincerely,

Patrick Cabbage, LHG
Site Manager
Toxics Cleanup Program

pc:mr
Enclosure
By certified mail [7015 0640 0003 6619 7805]

cc by certified mail: Vanessa A. Hail, Attorney, Tesoro Companies, Inc. [7015 0640 0003 6619 7812]

cc: John Level, AAG



Ecology Comment #	Page in PDF	Document	Section in Document	Comments
1	7	RI/FS Work Plan	3.1 Potential Data Gap Evaluation	3rd paragraph, 1st sentence: Please include the well names of wells that these concentrations were measured at.
2	10	RI/FS Work Plan	4.2 Passive Soil Gas Sampling	2nd paragraph, last sentence: Is there a concern regarding false positives since the tank farm is active?
3	11	RI/FS Work Plan	4.3 Soil and Grab Ground-Water Sampling	5th paragraph of section, last sentence: Ecology may request to be present during the drilling in particular site areas.
4	11	RI/FS Work Plan	4.3 Soil and Grab Ground-Water Sampling	6th paragraph of section, 1st sentence: Will sampling result in HClID, or each individual analysis results?
5	34	HASP	B1.1 Passive Soil Gas Sampling	2nd paragraph, last sentence: HASP states that passive soil gas samples will be shipped to BEACON's analytical laboratory. What specific lab will these samples be analyzed at? Need to ensure that the selected lab is accredited in Washington State. BEACON is not an accredited lab.
6	36	SAP	B1.2 Soil and Grab Ground-Water Sampling	5th paragraph of section, last sentence: Need to ensure that silica gel cleanup will not be used during analyses.
7	36	SAP	B1.3 Well Installation	2nd paragraph, last sentence: Well screens do not need to be 15-20 feet long. We have good information regarding the seasonal groundwater fluctuation at the site.