

Cruz, Jerome (ECY)

From: Robbins, Don [Robbins.D@portseattle.org]
Sent: Monday, May 21, 2012 5:23 PM
To: Cruz, Jerome (ECY)
Subject: SeaTac Dev Site Consent Decree Comment Letter
Attachments: 5-21-12 Consent Decree Comment Ltr Port of Seattle.pdf

Jerome,
Attached are the Port of Seattle's comments on the SeaTac Development Site Consent Decree.
Give me a call if you have any questions.

Don Robbins

Aviation/Environmental
(206) 787-4918
robbins.d@portseattle.org

Port
of Seattle

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is public and may be subject to disclosure.*



May 21, 2012

Jerome,

The Port of Seattle appreciates the opportunity to comment on the Consent Decree for the Environmental Cleanup of the SeaTac Development Site. These comments are a reiteration of those submitted on October 5, 2011 regarding the Cleanup Action Plan (CAP), found in the Consent Decree as an Exhibit.

It continues to be the Port of Seattle's position that the potential for vapor intrusion must be evaluated for the least restrictive property uses on the Port owned parking lot property south of South 160th Street. The RI/FS has only evaluated this pathway using a "commercial building" scenario.

Also, short-term increases in TPH-G and benzene values reported at MW-22 are still a concern. The Port's position is that collection of additional groundwater monitoring data is necessary to determine whether contaminant concentrations are stable or declining in wells closest to Port property, especially near MW-B. A contingent task should be added to the addendum and subsequent groundwater monitoring plans to increase the scope of sampling to include MW-A if nearby wells begin to show an upward trend.

If you have any question please feel free to contact me.

A handwritten signature in black ink, appearing to read "Donald A. Robbins". The signature is fluid and cursive, with a long horizontal stroke at the end.

Donald A. Robbins
Senior Environmental Program Manager
Port of Seattle

Cruz, Jerome (ECY)

From: Cruz, Jerome (ECY)
Sent: Tuesday, May 29, 2012 10:23 AM
To: 'Robbins, Don'
Cc: Fitz, Andy (ATG); Warren, Bob (ECY); Wang, Ching-Pi (ECY); Lui, Nancy (ECY)
Subject: RE: SeaTac Dev Site Consent Decree Comment Letter
Attachments: Seatacdev_CD_ECYtoPort05252012.pdf

Hi Don,

Please find attached Ecology's response to the Port of Seattle's comment letter on the SeaTac Development consent decree. Please do not hesitate to call me if you have any questions.

Regards,
Jerome



Jerome B. Cruz, Ph.D.

Toxics Cleanup Program, Northwest Regional Office

3190 - 160th SE Bellevue, WA 98008

Tel: (425) 649-7094 Fax: (425) 649-7098

Jerome.Cruz@ecy.wa.gov

<http://www.ecy.wa.gov/programs/tcp/cleanup.html>

From: Robbins, Don [<mailto:Robbins.D@portseattle.org>]
Sent: Monday, May 21, 2012 5:23 PM
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
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May 25, 2012

Mr. Donald A. Robbins
Senior Environmental Program Manager
Port of Seattle
PO Box 1209
Seattle, WA 98111

Re: Port of Seattle Comments on SeaTac Development Consent Decree

Dear Mr. Robbins:

Thank you for your comment letter on the SeaTac Development Consent Decree. Please be aware that a comment period relating to the Remedial Investigation/Feasibility Study (RI/FS) and Draft Cleanup Action Plan (DCAP) has already been held, with a Responsiveness Summary already issued by Ecology. The most recent comment period related solely to a proposed consent decree. While the proposed consent decree would implement the RI/FS and Cleanup Action Plan (CAP) as finalized after public comment on the DCAP, the most recent comment period is related solely to the decree itself and not to those documents that were already addressed in a previous comment period.

I will point out that Ecology has already evaluated the Port's concerns and addressed them in the Responsiveness Summary on the DCAP (which includes the Addendum to the RI/FS and DCAP). The Responsiveness Summary addressed the Port of Seattle's concerns on vapor intrusion, groundwater monitoring, and contingent tasks for the plume closest to the Port's property. I refer to you the following portions of these documents that address the concerns repeated in your letter:

Vapor intrusion potential:

- DCAP Appendix B (Responsiveness Summary): pages 17-19 (Item 8)
- Addendum (Appendix B of Responsiveness Summary): page 7 (soil vapor issue #1), page 9 (soil vapor issue #3), 2nd bullet on page 12

Groundwater monitoring at MW-22 and nearby, and contingent tasks:

- DCAP Attachment E (Compliance Monitoring Plan): page 16 (section 5.1), page 17 (section 5.1.3), page 18 (sections 5.1.4 and 5.1.5), Table 1
- DCAP Appendix B (Responsiveness Summary): pages 14-15, page 16 (Items 4 & 6)

Mr. Donald A. Robbins

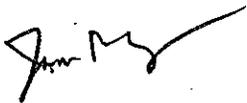
May 25, 2012

Page 2

- Addendum (Appendix B of Responsiveness Summary): #5 on page 2, #6 on page 4, #10 on page 5, #22 on page 10, 1st bullet on page 12

More to the point, the air sparging/soil vapor extraction, and natural attenuation is expected to reduce concentrations to the point that vapor intrusion and plume incursion will no longer be risks to adjacent Port property. Compliance monitoring will be carried out to ensure this trend is occurring in the right places, and reviews will be instituted to evaluate other remedial options or contingent actions at the appropriate time in the future. The CAP has controls in effect that will monitor the performance of the remedial system and carry out additional monitoring or corrective action if needed.

Sincerely,



Jerome B. Cruz
Site Manager
Toxic Cleanup Program