



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 19, 2019

Don Robbins
Senior Environmental Program Manager
Port of Seattle
P.O. Box 68727
Seattle, WA 98168

Notice of Periodic Review Conducted at the following Cleanup Site:

- Name: Continental Airlines Hydrant Fuel System
- Address: SeaTac International Airport, Concourse C and North Satellite, SeaTac, Washington
- Facility/Site No.: 77676343

Dear Don Robbins:

The Model Toxics Control Act (MTCA), Chapter 70.105D Revised Code of Washington, which governs the cleanup of hazardous waste sites in Washington State, requires the Department of Ecology to conduct a periodic review of sites with institutional controls and a 'No Further Action' status every five years. This letter serves to inform you that a periodic review has been conducted at the Continental Airlines Hydrant Fuel System (Site).

The periodic review process includes the following steps:

1. Review cleanup information including any recent monitoring data.
2. Confirm that the environmental covenant is active and recorded with the title to the property (or effective alternative system).
3. Visit the Site to confirm the institutional controls and conditions of the environmental covenant are effective.

The cleanup actions completed at the Site appear to be protective of human health and the environment. An "effective alternative system" for the institutional controls was implemented by the Port of Seattle (in place of an environmental covenant) since the property is owned by a government entity that does not routinely file with the county recording office [WAC 173-340-440 (8) (b)]. The effective alternative system is in place and has been effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.



However, the effective alternative system documents provided by the Port of Seattle are missing some elements required under WAC 173-340-440. The Port of Seattle must add the following restrictions to their effective alternative system documentation for the Site:

- a) **Interference with Remedial Action:** The property owner shall not engage in any activity on the property that may impact or interfere with the remedial action and any operation, maintenance, inspection, or monitoring of that remedial action without prior written approval from Ecology.
- b) **Protection of Human Health and the Environment:** The property owner shall not engage in any activity on the property that may threaten the continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the property (such as construction activities or other earthwork).
- c) **Conveyance of Any Interest:** The property owner must provide written notice to Ecology when conveying any interest, including but not limited to title, easement, leases, or other interests. A notice of the institutional controls and effective alternative system must be included in the conveying document.
- d) **Access:** The property owner grants Ecology and its authorized representatives, upon reasonable notice, the right to enter the property at reasonable times to evaluate the effectiveness of the institutional controls and associated remedial actions, including the right to take samples, inspect any remedial actions conducted on the property, and to inspect related records.
- e) **POSAV Compliance and Project Status Database:** Update your database to clarify that your No Further Action (NFA) status with Ecology is contingent upon institutional controls that limit or prohibit activities that interfere with the integrity of the cleanup action or that may result in exposure to hazardous substances at the Site.

The Port of Seattle should update their documentation as soon as possible. The updated documentation will be evaluated by Ecology during the next periodic review in 2024.

A periodic review will continue to be required every five years as long as contamination remains at the Site and institutional controls are required to protect human health and the environment.

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Please contact me at tamara.welty@ecy.wa.gov or (425) 649-7023 if you have any questions regarding this letter or if you would like additional information regarding site cleanups.

Sincerely,

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

Tamara Welty, LG, LHG
Toxics Cleanup Program, NWRO

Enclosures: Periodic Review Document

By Certified Mail: 9171 9690 0935 0214 2157 47