



## **RESPONSIVENESS SUMMARY**

### **Qwest Communications W00161 Site, Longview**

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#### ***Draft Second Periodic Review Report***

**Prepared by  
Washington State Department of Ecology  
Southwest Regional Office  
Toxics Cleanup Program  
Lacey, Washington**

**July 2019**

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double-sided copying.*

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## Site Information

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**Site Name:** Qwest Communications W00161

**Address:** 1305 Washington Way, Longview

**Facility Site ID:** 86395278

**Cleanup Site ID:** 6785

**Periodic Review Coordinator:** Panjini Balaraju  
Phone: 360-407-6335  
Email: panjini.balaraju@ecy.wa.gov

**Public Involvement Coordinator:** Nancy Davis  
Phone: 360-407-0067  
Email: nancy.davis@ecy.wa.gov

The Washington Department of Ecology (Ecology) reviewed conditions at the Qwest Communications W00161 site and concluded that the completed cleanup work combined with the environmental covenant restricting property use and conditions at the site are effective in protecting people's health and the environment. At least every five years, Ecology reviews condition at cleanup sites where some contamination remains at the site. This is the site's second review; the first was in 2014. The current review shows that cleanup work remains effective in protecting human health and the environment.

Ecology held a public comment period from June 6 to July 7, 2019. The comment period provided an opportunity for people to comment on the following document:

- Draft Second Periodic Review Report.

Ecology received one comment during the comment period. The comment and Ecology's response are summarized below.

## Site Background

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Leaking underground storage tanks on the site caused petroleum contamination of soil and groundwater. The owner removed three underground storage tanks and about 230 cubic yards of contaminated soil. Removal of contaminated soil near the foundation of the building stopped when excavation threatened the structure of the building. The excavated pits were filled with clean soil and paved over with asphalt. A remaining underground fuel tank located inside the building was decommissioned and capped with asphalt.

Groundwater has been monitored for petroleum contamination since 2003. For the nine groundwater sampling events since 2015, petroleum hydrocarbon concentrations were below MTCA (Model Toxics Control Act) Method A cleanup levels in four of five

monitoring wells. Diesel-range hydrocarbon concentration in groundwater at one monitoring well exceeded cleanup levels in two of seven sampling events. Currently groundwater is monitored every 18 months.

In 2007, an environmental covenant was filed for the site that prohibits activities that could cause the release of contaminants contained as part of the cleanup.

With the cleanup work completed and an environmental covenant in place, conditions at the site are protective of people health and the environment.

## **Next Steps**

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Because some contamination remains at the site, Ecology will conduct a periodic review at the site about every five years to ensure that conditions at the site continue to protect human health and the environment.

## **Comment # 1: Letter from Tetra Tech**

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See the following letter from Tetra Tech, Inc.



June 14, 2019

Panjini Balaraju  
Site Manager/Hydrogeologist  
Washington State Department of Ecology  
Toxics Cleanup Program, Southwest Regional Office  
P.O. Box 47775  
Olympia, Washington 98504-7775

**Subject: Comments on Second Periodic Review Report Draft Prepared by State of Washington  
Department of Ecology  
CenturyLink Longview Facility (formerly Qwest Communications) W00161  
Facility Site ID # 86395278  
Cleanup Site ID#: 6785  
1305 Washington Way, Longview, Washington 98632**

Dear Mr. Balaraju:

Tetra Tech, Inc. (Tetra Tech) and CenturyLink Communications, LLC (CenturyLink) received the draft second 5-year review for the above-referenced site from Nancy Davis Ph.D., Community Outreach and Environmental Education Specialist, Washington Department of Ecology (Ecology). The public comment period for this document is June 6, 2019 to July 7, 2019. Tetra Tech and CenturyLink have the following two comments on the draft 5-year review report. Text listed in *italics* is copied from the subject report.

**Comment No. 1, Page 8, Section 3.1, 3<sup>rd</sup> Paragraph.** *“The initial three rounds of groundwater sampling results were either non-detects or below MTCA Method A cleanup levels. However, the results of last three rounds of groundwater sampling showed a TPH-D and/or TPH-O concentrations in monitoring well MW-4 that are above the cleanup level. As a result, the groundwater sampling frequency has been changed to quarterly instead of 18 months. If the results of future quarterly groundwater monitoring show increase in TPH-D and TPH-O concentrations, appropriate contingency actions must be evaluated to address the groundwater contamination at the Site.”*

This paragraph appears to have been accidentally carried over verbatim from Section 3.1 of the 2014 Ecology 5-year review and is no longer accurate (Ecology 2014). In the nine sampling events since 2015, total petroleum hydrocarbons diesel range (TPH-D), TPH oil range (TPH-O), and benzo(a)pyrene toxic equivalent quotient (BaP TEQ) have been below Ecology cleanup limits in samples from four of the five site monitoring wells. At MW-02, there have been two instances where TPH-D concentrations exceeded the Ecology 500-microgram per liter (µg/L) cleanup limit (March 31, 2015 at 1,500 µg/L and May 4, 2017 at 570 µg/L) and seven events where concentrations were below Ecology cleanup limits.

The 2015 direct-push groundwater investigation at six additional temporary monitoring points found TPH-D, TPH-O, and BaP TEQ concentrations were all below Ecology cleanup levels, indicating that contaminants are not migrating downgradient above Ecology cleanup levels.

Tetra Tech and CenturyLink request that the second 5-year review be revised to more accurately summarize recent sampling results.

Additionally, previous written and verbal correspondence with Ecology indicated that groundwater sampling would be conducted every 18 months (Tetra Tech 2017 and 2019). Tetra Tech and CenturyLink request that the 5-year review be revised to include the previously agreed-to 18-month groundwater sampling frequency.

**Comment No. 2, Page 8, Section 3.5, 3<sup>rd</sup> Paragraph.** *“However, if the future quarterly groundwater monitoring results show increase in TPH-D and/or TPH-O concentrations, an appropriate groundwater remedy needs to be evaluated to address the groundwater contamination.”*

Tetra Tech and CenturyLink request that the second 5-year review be revised to state that the current groundwater sampling schedule is every 18 months

**Comment No. 3. Page 10, Section 4.0, First paragraph, 3<sup>rd</sup> Sentence.** *“However, if the results of future quarterly groundwater monitoring continue to show TPH-D and/or TPH-O concentrations that are above the cleanup level, an appropriate groundwater remedy needs to be evaluated to address the groundwater contamination.”*

Tetra Tech and CenturyLink request that the second 5-year review be revised to state that the current groundwater sampling schedule is every 18 months

**Comment No. 4. Page 10, Section 4.1, First paragraph, 2<sup>nd</sup> Sentence.** *“Ecology will also continue to review quarterly groundwater monitoring results.”*

Tetra Tech and CenturyLink request that the second 5-year review be revised to state that the current groundwater sampling schedule is every 18 months

#### **References:**

Washington Department of Ecology (Ecology). 2014. Periodic Review Report, Qwest Communications, W00161, Facility Site ID# 86395278, 1305 Washington Way, Longview, WA 98632. Southwest Region Office. May.

Ecology. 2019. Second Periodic Review Report Draft. Qwest Communications W00161. Facility Site ID# 86395278. Cleanup Site ID#: 6785. 1305 Washington Way, Longview, Washington 98632. May.

Tetra Tech, Inc (Tetra Tech). 2017. Groundwater Monitoring Report, CenturyLink Longview Facility, 1305 Washington Way, Longview, Washington 98632. June 27.

Tetra Tech. 2019. Groundwater Monitoring Report, November 2018. CenturyLink Longview Facility, 1305 Washington Way, Longview, Washington 98632. January 21.

If you have any questions or concerns, please contact me at (303) 312-8856 or [david.berestka@tetrattech.com](mailto:david.berestka@tetrattech.com).

Sincerely,



David Berestka, P.E.  
Project Manager  
Tetra Tech, Inc.

cc: Ed Clement, Regional Environmental Health and Safety Manager, CenturyLink  
Mark Reisig, Tetra Tech Program Manager



## Ecology's Response

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Ecology appreciates you for taking the time to review the draft second periodic review report and providing us with your comments. After my review of your comments and consulting with the site documents, Ecology has accepted all of your comments and revised the draft periodic review report accordingly. The revised report will include the corrections to the contaminant concentrations and change the sampling frequency from quarterly to every 18 months.

If you have any questions, please call me at (360) 407-6335.