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July 18, 2019

Marine Trades Area (MTA) Group  
c/o Brett Beaulieu, LHG  
Floyd | Snider  
601 Union Street, Suite 600  
Seattle, WA 98101

**Re: Approval of Conditional Point of Compliance. Ecology's Response to the Memorandum: Upland and Transitional Zone Sampling Results, Floyd | Snider, January 10, 2019**

- **Site Name:** Port of Port Angeles Marine Trades Area  
(Includes Pettit Oil Company Port Angeles WHS)
- **Site Addresses:** 617, 637, & 638 Marine Dr, Clallam County, Port Angeles, WA
- **Facility/Site IDs:** 1005 & 1008
- **Cleanup Site IDs:** 1301 & 3447

Dear MTA Group:

Thank you for preparing the January 10, 2019, memorandum summarizing the results of the upland and transitional zone sampling at the MTA site (Site). The current site conditions include the existence of contaminated groundwater up to and under the marine bulkhead and an air sparge/soil vapor extraction system planned adjacent to the bulkhead as the preferred remedy to address this groundwater.

Based on the results of this study and the current Site conditions, the Department of Ecology (Ecology) will approve a groundwater conditional point of compliance (CPOC) in the transitional zone at the Site under the following conditions:

- This is a site-specific decision based on the conditions and situation that exist at the Site.
- The potentially liable persons (PLPs) must demonstrate and document that all CPOC conditions included in WAC 173-340-720(8) (c) and the additional requirements listed under off-property CPOC conditions in WAC 173-340-720(8) (d) are met.
- Ecology does not approve of the application of calculated attenuation factors to sampling results from monitoring wells at top of bulkhead for compliance monitoring due to the potential for preferential pathways for groundwater to flow to surface water in the fill material at the Site.
- Transitional zone compliance monitoring wells will be located as close to the bottom of bulkhead as possible.

- Transitional zone compliance monitoring wells must be permanently installed wells.
- The transitional zone compliance monitoring well network will be a robust network in a configuration similar to that shown in Figure 1 (Proposed Sampling Locations) of the *Marine Trades Area Site Transitional Zone Sampling Work Plan* (Floyd | Snider, September 21, 2018).
- Additional transitional zone compliance monitoring wells should be added to the west end of the network described above, wrapping around the northwest corner of the Site and into the entrance of Tumwater Creek, to ensure contaminated groundwater is not entering the surface water of the creek near the fresh water/marine water interface.
- Any prepacked screens used must be able to eliminate clogging from fines described in Upland and Transitional Zone Sampling Results memo (January 10, 2019).
- Each monitoring plan must include adequate field parameters to prove the water samples are representative of groundwater prior to dilution by surface water. Typical parameters include chloride, sodium, electrical conductivity, temperature, dissolved oxygen, pH, redox potential, and water level. Sampling events should include the sampling of surface water and upgradient groundwater for comparison.
- Ecology expects additional testing during engineering design to determine optimal sampling depth, screen length, and timing of sampling relative to the tidal cycles and seasons.
- Engineering design must also consider whether different sections of the monitoring network need different designs based on existing conditions, such as the area around MW-21A where bank storage occurs or the area toward the eastern end of the network where loose, fine sand has the potential of clogging screens.
- Describe the framework of the transitional zone network in the draft cleanup action plan, but the final design will be determined and approved in final engineering design report and/or compliance monitoring plan.

Ecology will incorporate this approval into the draft cleanup action plan which will be released for public comment along with a draft order to implement the cleanup action plan for the Site. Next steps include negotiation of a draft order between Ecology and the Marine Trades Area Group with a goal of public review and comment this fall.

If you have any questions about this letter, please contact me at (360) 407-6254 or [connie.groven@ecy.wa.gov](mailto:connie.groven@ecy.wa.gov)

Sincerely,



Connie Groven, P.E.  
Toxics Cleanup Program  
Southwest Regional Office

By certified mail: 9489 0090 0027 6066 6766 43

cc: Karen F. Goschen, Port of Port Angeles  
Tim Bishop, Chevron Environmental Management Company  
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Tom Colligan, Floyd | Snider  
Ecology Site File