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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
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July 1, 2020

Renee Robinson, P.G.  
Manager Remediation  
NuStar Energy, L.P.  
19003 IH-10 West  
San Antonio, Texas 78257  
[renee.robinson@nustarenergy.com](mailto:renee.robinson@nustarenergy.com)

**Re: Ecology Review Supplemental Remedial Investigation and Revised Feasibility Study, NuStar Vannex Site, FSID# 61862781**

Dear Renee Robinson:

The following are Ecology's comments to the Supplemental Remedial Investigation and Revised Feasibility Study submitted on June 1, 2020. In general, this is a really good report. I have already uploaded this report with comment bubbles onto Cascadia's FTP site. The comments below are the major points and do not include minor edits included in the document.

Comments:

- Provide a table and map showing the truck loading area soil concentration reductions from initial samples to 2019 samples. This will help support the MNA alternative for this area.
- I would like to discuss the selected alternative approach for the west area when you have looked through my comments to make sure the alternative is most effective.
- Section 5.4.2, Page 25, A TEE evaluation will need to be done for this site. There are no exclusions for the site being industrial.
- Section 6, Page 26, Not sure why the Washington Hydraulic Code is considered an ARAR for this project. Would there be a need for an Hydraulic Project Approval?
- Section 7.2.2, Page 29, A conditional point of compliance was not approved for this site. The standard point of compliance is appropriate for the site.

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- Figure 7, MW-11 has concentrations in the GW that will likely need additional definition prior to design of the injections in that area. In addition, there may need to be a sentinel monitoring well between MW-11 and the CPU pumping well to demonstrate contaminated groundwater is not migrating toward the CPU well.

If you have any questions regarding Ecology's comments, please call me at (360) 407-6316.

Sincerely,

A handwritten signature in black ink that reads "Andrew Smith". The signature is written in a cursive style with a large initial 'A'.

Andrew Smith, P.E., LHG  
Unit Supervisor, UST/Technical Support Unit  
Southwest Regional Office  
Toxics Cleanup Program

cc by email: Amanda Spencer, Cascadia Associates, LLC, [aspencer@cascadiaassociates.com](mailto:aspencer@cascadiaassociates.com)