



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4601 N Monroe Street • Spokane, WA 99205-1295 • 509-329-3400

January 4, 2021

William (Bill) H. Collins
Tidewater Terminal Company, Inc.
P.O. Box 1210
6305 NW Old Lower River Road
Vancouver, WA 98660

Re: Comments on Annual 2020 Groundwater Monitoring Report:

- **Site Name:** Tidewater Fuel Line Leak
- **Site Address:** 2900 Sacajawea Park Road, Pasco WA, 99301
- **Cleanup Site ID:** 2331
- **Facility/Site ID:** 39378684

Dear William Collins:

This letter includes the comments on the 2020 annual groundwater monitoring report for the Tidewater Fuel Line Leak Site (Site) that Ecology e-mailed to you and Reuben Greer at Jacobs Engineering (Jacobs).

Ecology has the following comments on Subsection 2.3, Well AR-4 Damage, p. 2-2; and Subsection 4.1, Recommendations for Well AR-4 replacement, p. 4-2 through 4-3:

- Ecology agrees that Well AR-1 is a suitable replacement for Well AR-4, however because Well AR-4 is damaged and cannot be used anymore, the well must be abandoned in accordance with all applicable Washington State regulations governing groundwater well abandonment.
- The PVC casing and screen well could have been weakened by prolonged exposure to fuel hydrocarbons. This is a possibility that must be considered before using Well AR-1 as a replacement well.
- Before using Well AR-1 as a replacement monitoring point, the following must be performed:
 - Abandon Well AR-4 as discussed above
 - Check Well AR-1 for free floating product or sheen

- If Well AR-1 is free from floating product or sheen, the well must be developed to reduce silt and fines in accordance with well installation industry standards.
- If Well AR-1 turns out to be damaged or unusable for groundwater sampling purposes now or in the future, replacement wells for AR-1 and AR-4 must be installed. This requirement is in accordance with monitoring and sampling requirements set forth in Table 2 in the November 2017, Compliance Groundwater Monitoring Report.
- Ecology recommends the following actions before using Well AR-1 as a replacement well for AR-4 if the well is free from floating product or sheen:
 - Perform a TV camera and caliper survey to check the integrity of the well casing and screen. In particular, the caliper survey should be performed after the well development to check if the well development has damaged the well screen.

If you have any questions about this request or how to complete your work plan, please contact Ecology's cleanup project manager, Christer Loftenius, at (509) 329-3543 or clof461@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christer Loftenius".

Christer Loftenius, L.G. L.H.G.

Site Manager

Toxics Cleanup Program, Eastern Region

cc: Reuben Greer, Jacobs Engineering