

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

In the Matter of: )  
SEA-TAC INTERNATIONAL AIRPORT ) AGREED ORDER  
TO: Port of Seattle ) # 97TC-N122  
Sea-Tac International Airport  
P.O. Box 68727  
Seattle, WA 98168-0727

I.

Jurisdiction

This Agreed Order ("Order") is issued pursuant to the authority of RCW 70.105D.050(1).

II.

Findings of Fact

Ecology makes the following Findings of Fact, without admission of such facts by the Port of Seattle.

1. Seattle-Tacoma International Airport (STIA) is a major commercial air facility serving the Pacific Northwest.

The Port of Seattle (Port) has owned and operated STIA since it opened in 1944. Numerous facilities, including passenger terminals, baggage and cargo facilities, ground transportation facilities, and aircraft maintenance and fueling facilities have been constructed and used at STIA

since its opening in support of general and commercial aircraft operations and associated airport activities. These facilities are located within an area of about 1/2 square mile in the southeast quadrant of the airport. This 1/2 square-mile area will subsequently be referred to in this Agreed Order as the "Aircraft Operations and Maintenance Area (AOMA)."

2. Hazardous substances have been released at times within the AOMA from some of these facilities. By bulk volume, the most abundant contaminant is jet fuel. Other known contaminants include, primarily, gasoline, but also some industrial solvents, mineral spirits, lubricating oil, and aircraft deicing fluids. At this time, twelve separate areas (sites) within the AOMA are known to have contaminants present in perched ground water and/or significant soil contamination (Appendix I). Ground water in the Qva aquifer (see Section II.3 below) is also impacted at four of the twelve sites. Eight sites are impacted with jet fuel, two sites with gasoline, and two sites are impacted by more than one contaminant. There are also some small areas within the AOMA where the contamination is apparently minor and limited to near-surface soils.

Environmental investigations and/or cleanup actions have been or are currently being conducted independently by STIA tenants and/or the Port in all contaminated areas. Cleanup actions have been completed at four former sites within the AOMA, and also at some of the areas with minor contamination.

Unknown areas of contamination could exist within the AOMA. It is not practicable to conduct a remedial investigation of the entire AOMA in order to identify unknown contaminated areas because: (1) the extensive drilling required would be very difficult given taxiing aircraft, thick concrete in most areas, and the large number of underground utilities, (2) such extensive work over time would represent a significant safety risk to aircraft operations and personnel, (3) extensive drilling could potentially spread contamination, and (4) costs of investigating the 1/2 sq. mile area of the AOMA would be prohibitive.

3. Zones of perched ground water have been identified at some locations within the AOMA. These zones are small and discontinuous laterally, occur at various depths, and the perched ground water flows in various directions. STIA



area perched groundwater is not a public or private drinking water resource based on current information.

The uppermost aquifer of regional extent beneath the airport is an unconfined aquifer known in the technical literature as the Qva aquifer. The Qva Aquifer is not used as a public drinking water supply resource in the general area of STIA. Available information from wells located in the AOMA indicates the Qva aquifer surface is at about 90 ft. below ground surface (bgs) at the north end of the AOMA, and about 60 ft. bgs at the south end of the AOMA. Over the same areal extent, the ground surface elevation changes by about 25 ft. At individual sites, the local flow directions of the Qva aquifer are predominantly to the west, that is, from the AOMA towards the interior of the airport (taxiway and runway areas), with northwestward and southwestward flow components at some sites.

4. A project to (1) evaluate ground water flow in the Qva aquifer throughout the AOMA, (2) model contaminant fate and transport, and (3) confirm model results by obtaining and analyzing ground water samples is appropriate because:

(a) The project results would determine whether or not the Qva aquifer downgradient of the AOMA has been



significantly impacted by airport operations within the AOMA during the last 50 years.

(b) The project results would confirm the predominant flow direction of the Qva aquifer relative to the AOMA and downgradient from the AOMA. If a westward flow direction is confirmed, this would demonstrate that contamination generated within the AOMA would migrate to the interior of the airport property via ground water flow in the Qva aquifer.

(c) The project results would provide a more comprehensive understanding than is now available of the fate and transport of contamination within the AOMA. Project results would identify the potential risk posed by contamination within the AOMA to public drinking water supply wells (specifically the City of Seattle Highline well field north of STIA, and the Highline Water District Angle Lake and Des Moines production wells south of STIA); any publicly recorded and operational local private drinking water supply wells; Bow Lake; Des Moines Creek; and Miller Creek. These surface water bodies and drinking water supply wells will hereafter be collectively referred to as "potential local receptors" in this Agreed Order.

(d) The information generated by the project could

provide a basis for a consistent approach to cleanup actions within the AOMA.

5. The primary cause of soil and ground water contamination at STIA has been leakage from underground storage tanks (USTs) and associated underground piping. UST systems exist at STIA that are critical to airport/aircraft operations. The various UST systems have different regulatory requirements depending on the size and function of the system. Most small UST systems at STIA are fully regulated under Washington UST regulations (WAC 173-360). The airport hydrant fuel distribution systems (hydrant systems) are specifically deferred from leak detection requirements (WAC 173-360-110(3d)) because of the inherent technical difficulties in accurately testing large, high-throughput systems. The UST systems at STIA that store heating fuel are exempt from all UST regulatory requirements except release reporting (WAC 173-360-110 (2h)).

The UST regulations require that fully regulated UST systems must be either upgraded to meet specific standards or closed by the end of 1998. In recent years most of these systems at STIA have either been upgraded to 1998 standards or closed. In late 1995, owners/operators of fully regulated UST systems that did not meet 1998 standards

reported to the Port that such systems would be either upgraded or removed. Furthermore, owners/operators of the deferred hydrant systems have made credible voluntary efforts to address leak detection on those hydrant systems.

As part of a project concerning ground water quality at STIA, however, it is appropriate to evaluate the feasibility of additional pollution prevention activities regarding all UST systems at STIA.

### III.

#### Ecology Determinations

1. The Port of Seattle is an "owner or operator" as defined at RCW 70.105D.020(6) of a "facility" as defined in RCW 70.105D.020(3).

2. The facility is known as Sea-Tac International Airport and is located within the city of SeaTac, King County, Washington.

3. The substances found at the facility as described above are "hazardous substances" as defined at RCW 70.105D.020(5).

4. Based on the presence of these hazardous substances at the facility and all factors known to the Department, there is a release or threatened release of hazardous



substances from the facility, as defined at RCW  
70.105D.020(10).

5. By a letter of December 23, 1996, the Port of Seattle voluntarily waived its rights to notice and comment and accepted Ecology's determination that the Port of Seattle is a "potentially liable person" under RCW 70.105D.040.

6. Pursuant to RCW 70.105D.030(1) and 70.105D.050, the Department may require potentially liable persons to investigate or conduct other remedial actions with respect to the release or threatened release of hazardous substances, whenever it believes such action to be in the public interest.

7. Based on the foregoing facts, Ecology believes the ground water evaluation required by this Order is in the public interest.

#### IV.

##### Work to be Performed

Based on the foregoing Facts and Determinations, it is hereby ordered that the Port of Seattle take the following actions and that these actions be conducted in accordance with Chapter 173-340 WAC unless otherwise specifically provided for herein. Two distinct types of action will be

performed under this Agreed Order: STIA Groundwater Study Tasks (Tasks IV.1 - IV.5) and STIA Fuel Systems Pollution Prevention Tasks (Tasks IV.6 - IV.7).

1. The Port will research existing technical literature, environmental and geological reports, land-use data, airport historical information, and other appropriate documents. The purposes of the research are:

(a) To provide a background hydrogeological description of the aquifers at the airport and surrounding area, and their relation to the AOMA and potential local receptors.

(b) To identify (1) known and potential (based on historical operations) areas of soil and ground water contamination within the AOMA and its near-vicinity (defined, for STIA groundwater study tasks, as within approximately 1/4 mile of the AOMA), and (2) potential preferred pathways of contaminant transport.

(c) To compile a database of wells screened across the surface of the Qva aquifer throughout the AOMA and its near vicinity. The database will include, to the extent information is available, well locations, construction details, ground water elevation data, ground water quality data, and available hydrogeological data and existing



calculations (flow rate and direction, gradient, slug and pump test results, computed hydraulic conductivity, etc.).

(d) To identify any publicly recorded, operational, private drinking water supply wells within one mile of the AOMA that could potentially be impacted by contamination within the AOMA.

2. Ground water elevation data for the Qva aquifer will be acquired from a set of wells representative of the entire AOMA and its near vicinity. The representative set of wells will consist of approximately 10 - 15 wells selected from the well database compiled for Task IV.1(c). The selected wells will be located in the area of the AOMA and its near vicinity. Wells outside the AOMA will be limited to existing wells that are reasonably accessible and in useable condition. The final representative set of wells will be agreed upon by Ecology and the Port. Four quarterly rounds of ground water elevation data will be collected from the set of representative wells. Ground water elevation contours will be determined from each of the quarterly data sets. The data will be reported to Ecology after each quarterly round. If Ecology and the Port agree that additional hydrogeological data are necessary to complete the modeling described in Task IV.3, the Port will conduct



the agreed hydrogeological testing on wells selected by Ecology and the Port from the representative set.

3. A ground water flow and contaminant fate and transport model will be developed utilizing appropriate data obtained in Tasks IV.1 and IV.2. The modeling will evaluate the possibility that known and potential (based on historical operations) contamination within the AOMA could impact the potential local receptors. The modeling will utilize standard software and methodology to be selected by agreement of Ecology and the Port.

4. Following the completion of Tasks IV.1, IV.2, and IV.3, Ecology and the Port will evaluate task-generated data and modeling results. Ecology and the Port will agree to a scope of work for additional investigation activities agreed necessary, based on the results of Tasks IV.1, IV.2, and IV.3. Additional work will be stipulated in an Addendum to this Agreed Order (STIA Ground Water Study, Phase II). Additional activities could include the installation of up to 10 - 15 new wells to be used to confirm modeling results, to conduct additional characterization of ground water and/or to perform long-term monitoring of ground water as appropriate. Model results will be used by Ecology and the Port to jointly determine the need for, and the location of,

new ground water monitoring wells to be installed in the Qva aquifer, or other locations, as agreed appropriate.

5. The Port will prepare a report compiling and evaluating data generated from Tasks IV.1, IV.2, IV.3, and IV.4 (STIA Ground Water Study Phase I Report). An approximate schedule of Tasks IV.1 through IV.5 activities (STIA Ground Water Study Tasks) is provided as Appendix 2.

6. Ecology and the Port will work together to assess the fuel storage and distribution systems at STIA and to identify and address appropriate fuel systems pollution prevention activities:

(a) Ecology and the Port will communicate with the owners/operators of the following fuel facilities: pipelines, fuel racks, and UST systems at STIA that are either deferred or exempt from certain provisions of the UST regulations (i.e. heating oil USTs and hydrant systems). Ecology and the Port will develop an understanding of the technical operations of each of these fuel facilities, and will discuss leak detection and prevention methods with the individual owners/operators.

Ecology and the Port will work with the owners/operators of each fuel facility to identify technically and economically reasonable leak detection and

prevention methods specific to each individual fuel facility, which could possibly be employed in addition to, or in lieu of, any methods already in place. Leak detection and prevention methods to be considered could include, but would not be limited to: tank tightness testing, pipeline tightness testing, internal tank inspection, corrosion protection, fuel inventory control procedures, installation of automatic tank gauging equipment, continuous pressure monitoring, best management practices, etc. Ecology and the Port will also work with owners/operators to identify reasonable time periods in which the identified leak detection and prevention methods could be accomplished.

For the purpose of determining that each fuel facility is operated to reasonably detect and prevent releases to the soil and ground water, Ecology and the Port will request each owner/operator to implement the identified leak detection and prevention methods. Ecology and the Port will maintain regular contact with owners/operators to track progress and determine whether the requested leak detection and prevention methods are accomplished within the identified time periods.

(b) Ecology will conduct an inspection of all UST systems at STIA that are subject to the Washington UST



regulations (WAC 173-360). Ecology will compile and/or update system information, provide technical assistance concerning compliance with current and 1998 UST requirements, and notify owners/operators of violations. After a reasonable time, Ecology will conduct a second inspection of any owners/operators found in violation to insure violations have been corrected and to conduct enforcement if appropriate. Ecology will report updated system information and results of inspections to the Port.

(c) The Port will create a database for all UST systems at STIA. The purpose of the database is to enable the Port to track the changes in operations and equipment of the UST systems at STIA brought about by (1) the procedures requested in Task IV.6(a), and/or (2) the procedures and upgrades of equipment required by the UST regulations to meet the 1998 UST standards. The database will include available UST system information such as tank size, age, construction, leak detection methods, corrosion protection, associated piping, etc., for all Port owned and tenant owned/operated UST systems.

(d) For the requirements of this Agreed Order, the Port will annually, for a period of five years beginning

June, 1997, present to the owners/operators of UST systems at STIA a written request to provide (1) information identifying changes and upgrades made to UST system equipment and operations during the past year; and (2) specific descriptions of methods and procedures used to perform leak detection/prevention during the past year. The Port will update the UST database (Task IV.6(c)) with information provided in response to these requests.

7. The Port will prepare a report presenting the results of Tasks IV.6(a) and (c), (STIA Fuel Systems Pollution Prevention Report), at the conclusion of subtasks (b) and (c). The Port will include a report prepared by Ecology presenting the results of Task IV.6(b) as an Appendix to this report. The Port will also provide annual reports (STIA Fuel Systems Pollution Prevention Followup Reports) presenting the information generated by completion of Task IV.6(d). In addition, the Port will notify Ecology of apparent differences in UST system regulatory requirements and reported system design and/or operation, as well as apparent deviation from the accomplishment of owner/operator agreed leak detection and prevention measures, whenever such apparent differences or deviations become known. An approximate schedule of Tasks IV.6 and

IV.7 activities (STIA Fuel Systems Pollution Prevention Tasks) is provided as Appendix 3.

V.

Terms and Conditions of Order

1. Definitions

Unless otherwise specified, the definitions set forth in ch. 70.105D RCW and ch. 173-340 WAC shall control the meanings of the terms used in this Order.

2. Public Notices.

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that the Order is inadequate or improper in any respect.

3. Remedial Action Costs. The Port shall pay to Ecology costs incurred by Ecology beginning July 1, 1996 pursuant to this Order. These costs shall include work performed by Ecology or its contractors for investigations, remedial actions, and Order preparation, oversight and



administration. Ecology costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2). Ecology and the Port may enter into an agreement for the prepayment of recoverable MTCA costs related to the Airport. In the event that costs are not covered by a prepayment agreement, the Port shall pay the required amount within 90 days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general description of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Failure to pay Ecology's costs within 90 days of receipt of the itemized statement of costs will result in interest charges.

4. Designated Project Coordinators. The project coordinator for Ecology is:

Roger Nye  
Department of Ecology, N.W. Regional Office  
3190 160th Ave. S.E.  
Bellevue, WA 98008-5452

The project coordinator for the Port is:

Paul Agid  
Port of Seattle  
P.O. Box 68727  
Seattle, WA 98168

The project coordinator(s) shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communications between Ecology and the Port concerning implementation of this Order, and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the project coordinator(s). Should Ecology or the Port change project coordinator(s), written notification shall be provided to Ecology or the Port at least ten (10) calendar days prior to the change.

5. Performance. All work performed pursuant to this Order shall be under the direction and supervision, as necessary, of a professional engineer or hydrogeologist, or similar expert, with appropriate training, experience and expertise in hazardous waste site investigation and cleanup.

The Port shall notify Ecology as to the identity of such engineer(s) or hydrogeologist(s), and of any contractors and subcontractors to be used in carrying out the terms of this Order, in advance of their involvement at the Site. The Port shall provide a copy of this Order to all agents, contractors and subcontractors retained to perform work required by this Order and shall ensure that all work

undertaken by such agents, contractors and subcontractors will be in compliance with this Order.

Except where necessary to abate an emergency situation, the Port shall not perform any remedial actions at STIA, outside that required by this Order, that would foreclose or preempt remedial actions under discussion or negotiation with Ecology unless Ecology concurs, in writing, with such additional remedial actions.

6. Access. Consistent with applicable safety and security requirements, Ecology or any Ecology authorized representative shall have the authority to enter and freely move about the Site at all reasonable times for the purposes of, inter alia: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing the progress in carrying out the terms of this Order; conducting such tests or collecting samples as Ecology or the project coordinator may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by the Port. By signing this Agreed Order, the Port agrees that this Order constitutes reasonable notice of access, and agrees to allow



access to the Site at all reasonable times, consistent with applicable safety and security requirements, for purposes of overseeing work performed under this Order. Ecology shall allow split or replicate samples to be taken by the Port during an inspection unless doing so interferes with Ecology's sampling. The Port shall allow split or replicate samples to be taken by Ecology and shall provide seven (7) days notice before any sampling activity.

*weather*

7. Public Participation The Port and Ecology shall prepare a public participation plan for implementation of this Agreed Order. Ecology shall maintain the responsibility for public participation at the site with respect to this Agreed Order. The Port shall help coordinate and implement public participation for the site.

8. Retention of Records. The Port shall preserve in a readily retrievable fashion, during the pendency of this Order and for ten (10) years from the date of completion of the work performed pursuant to this Order, all records, reports, documents, and underlying data in its possession relevant to this Order. Should any portion of the work performed hereunder be undertaken through contractors or agents of the Port, then the Port agrees to include in their

contract with such contractors or agents a record retention requirement meeting the terms of this paragraph.

9. Dispute Resolution. The Port may request Ecology to resolve disputes which may arise during the implementation of this Order. Such request shall be in writing and directed to the signatory, or his/her successor(s), to this Order. Ecology resolution of the dispute shall be binding and final. The Port is not relieved of any requirement of this Order during the pendency of the dispute and remains responsible for timely compliance with the terms of the Order unless otherwise provided by Ecology in writing.

10. Reservation of Rights/No Settlement. This Agreed Order is not a settlement under ch. 70.105D RCW. Ecology's signature on this Order in no way constitutes a covenant not to sue or a compromise of any Ecology rights or authority. Ecology will not, however, bring an action against the Port to recover remedial action costs paid to and received by Ecology under this Agreed Order. In addition, Ecology will not take additional enforcement actions against the Port to require those remedial actions required by this Agreed Order, provided the Port complies with this Agreed Order.



Ecology reserves the right, however, to require additional remedial actions at the Site should it deem such actions necessary.

Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the releases or threatened releases of hazardous substances from STIA.

In the event Ecology determines that conditions at the Site are creating or have the potential to create a danger to the health or welfare of the people on the Site or in the surrounding area or to the environment, Ecology may order the Port to stop further implementation of this Order for such period of time as needed to abate the danger.

11. Transference of Property No voluntary or involuntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by the Port without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.



Prior to transfer of any legal or equitable interest the Port may have in the site or any portions thereof, the Port shall ensure that any prospective purchaser, lessee, transferee, assignee, or other successor in such interest shall provide access to Ecology, consistent with applicable health and safety requirements, to carry out the terms of this Agreed Order. In the event the site or any portions of the site are sold to an entity not a party to this order, the Port shall notify Ecology of the contemplated sale at least thirty (30) days prior to finalization of any transfer.

12. Compliance with Other Applicable Laws.

A. All actions carried out by the Port pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements, including requirements to obtain necessary permits, except as provided in paragraph B of this section.

B. Pursuant to RCW 70.105D.090(1), the substantive requirements of chapters 70.94, 70.95, 70.105, 75.20, 90.48, and 90.58 RCW and of any laws requiring or authorizing local government permits or approvals for the remedial action under this Order that are known to be applicable at the time

of issuance of the Order have been included in Section IV, and are binding and enforceable requirements of the Order.

The Port has a continuing obligation to determine whether additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order. In the event the Port determines that additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order, it shall promptly notify Ecology of this determination. Ecology shall determine whether Ecology or the Port shall be responsible to contact the appropriate state and/or local agencies. If Ecology so requires, the Port shall promptly consult with the appropriate state agencies and provide Ecology with written documentation from those agencies of the substantive requirements those agencies believe are applicable to the remedial action.

Ecology understands that the issue of which entity is considered the local government land-use permitting authority at STIA is in litigation. Until the issue is resolved, Ecology shall assume that the status quo remains in effect (i.e, the Port is considered the local government land-use permitting agency for purposes of this Order). In the event that another entity is deemed to be the local

permitting entity prior to the time the Work under this Order is completed, if Ecology so requires, the Port shall promptly consult with that local agency and provide Ecology with written documentation from that agency of the substantive requirements which that agency believes are applicable to the remedial action. Ecology shall make the final determination on the additional substantive requirements that must be met by the Port under this Order and on how the Port must meet those requirements. Ecology shall inform the Port in writing of these requirements. Once established by Ecology, the additional requirements shall be enforceable requirements of this Order.

Ecology shall ensure that notice and opportunity for comment is provided to the public and appropriate agencies prior to establishing the substantive requirements under this section.

C. Pursuant to RCW 70.105D.090(2), in the event Ecology determines that the exemption from complying with the procedural requirements of the laws referenced in RCW 70.105D.090(1) would result in the loss of approval from a federal agency which is necessary for the State to administer any federal law, the exemption shall not apply and PLP shall comply with both the procedural and



substantive requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

VI.

Satisfaction of this Order

The provisions of this Order shall be deemed satisfied upon the Port's receipt of written notification from Ecology that the Port has completed the remedial activity required by this Order, as amended by any modifications, and that all other provisions of this Agreed Order have been complied with.

VII.

Enforcement

1. Pursuant to RCW 70.105D.050, this Order may be enforced as follows:
  - A. The Attorney General may bring an action to enforce this Order in a state or federal court.
  - B. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.

C. In the event the Port refuses, without sufficient cause, to comply with any term of this Order, the Port will be liable for:

- (1) up to three times the amount of any costs incurred by the state of Washington as a result of its refusal to comply; and
- (2) civil penalties of up to \$25,000 per day for each day it refuses to comply.

D. This Order is not appealable to the Washington Pollution Control Hearings Board. This Order may be reviewed only as provided under Section 6 of ch. 70.105D RCW.

Effective date of this Order: \_\_\_\_\_

THE PORT OF SEATTLE

STATE OF WASHINGTON

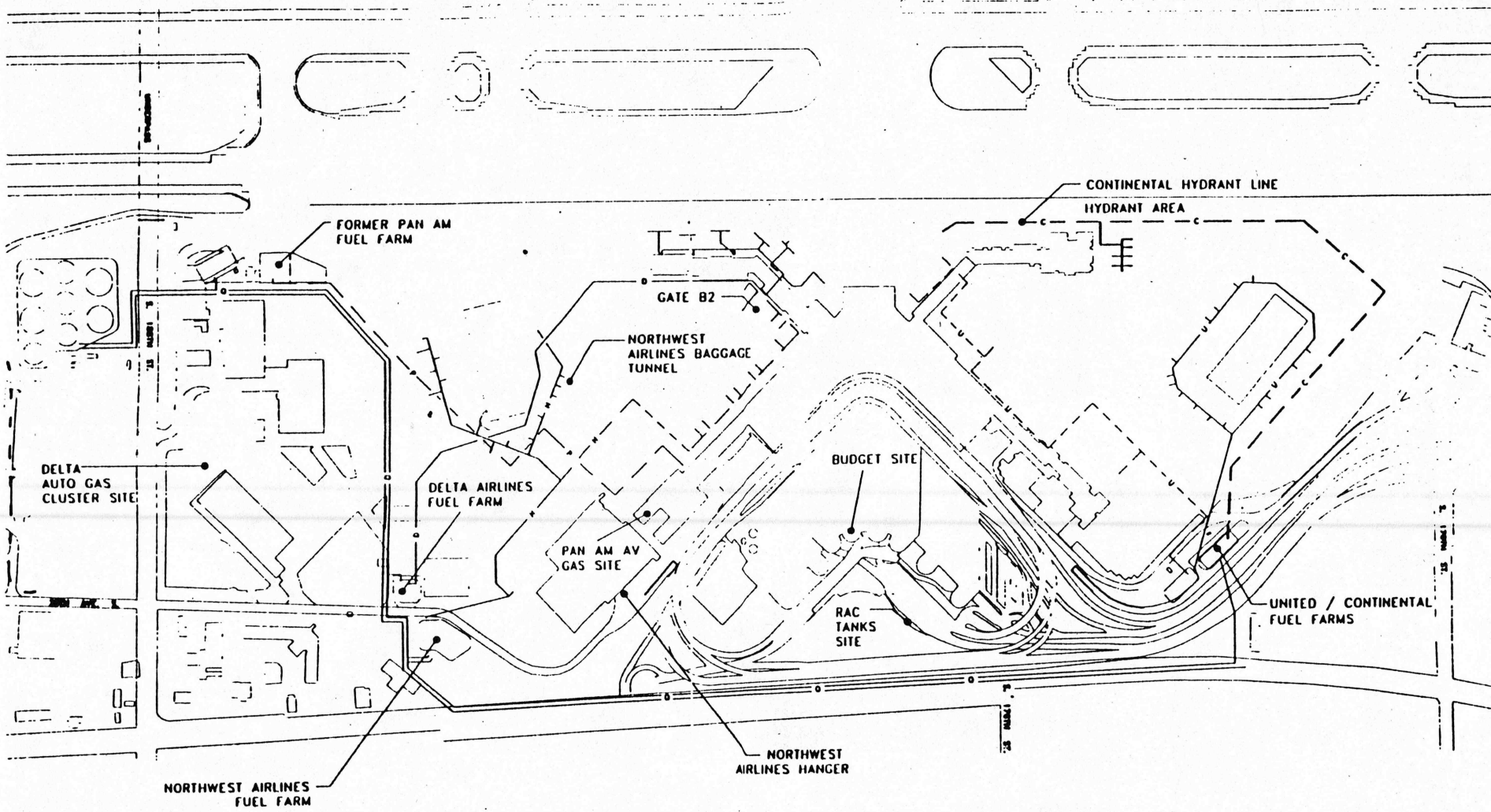
DEPARTMENT OF ECOLOGY

By \_\_\_\_\_

By \_\_\_\_\_

APPENDICES





**ASSOCIATED  
EARTH  
SCIENCES, INC**

179 Madrone Lane North  
Bainbridge Island, WA 98110 FAX (206) 780-9370  
(206) 780-9438  
811 5th Avenue, Suite 100  
Kirkland, WA 98033 FAX (206) 827-7701  
(206) 827-5424

DESIGNED	J.S.
DRAWN	P.B.
CHECKED	J.S.
APPROVED	J.S.

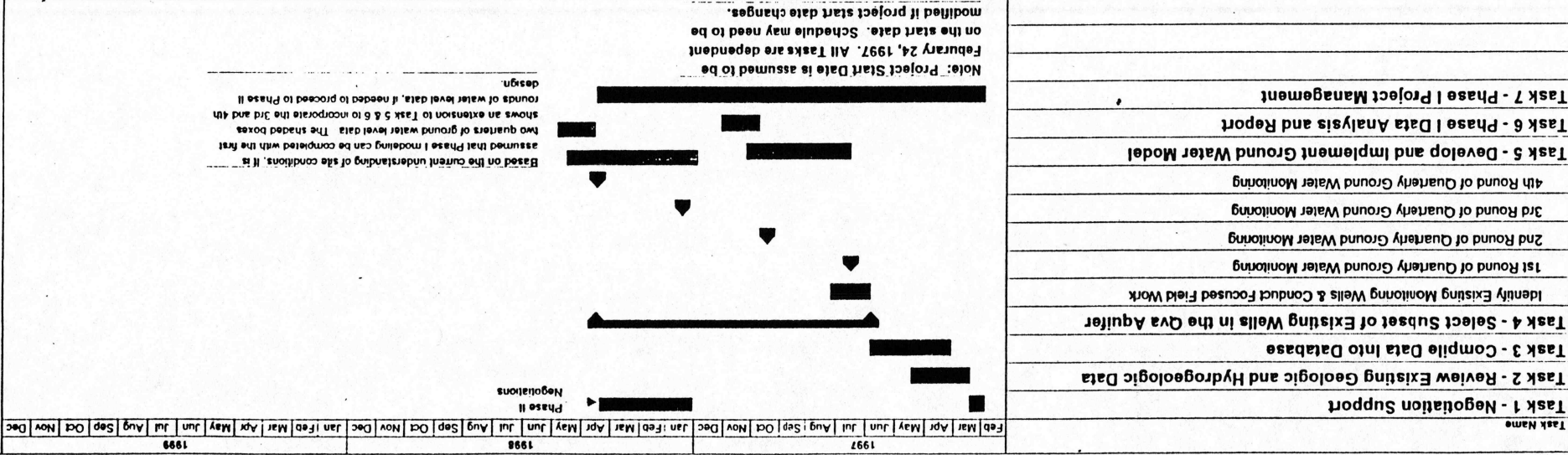
**AIRCRAFT OPERATIONS &  
MAINTENANCE AREA (AMOA)  
STIA GROUND WATER STUDY  
APPENDIX 1, PAGE 1**

PROJECT NO	VB9522A
FOUNDER NO	

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Known Contaminated Sites at STIA

Site	Qva Impact	Jet A Only	Gasoline Only	Mixed Contaminants
United/Continental Fuel Farm Area		x		
Northwest Fuel Farm		x		
Delta Fuel Farm		x		
Former Pan Am Fuel Farm		x		
Former Pan Am Avgas Tank Area	x	x		
Continental Hydrant System - Hydrant Area		x		
Northwest Hydrant System - South Satellite Baggage Tunnel Area	x	x		
Northwest Hangar Tanks Area				x
Gate B-2		x		
Delta Auto Gas Cluster				x
Budget Site	x		x	
RAC Tanks Site	x		x	





**Appendix 3**

**Fuel Systems Pollution Prevention Tasks  
Tentative Schedule**

- Task A: Pollution prevention discussions with owners  
of deferred/exempt UST systems..... April 1, 1997 -- October 1, 1997
- Task B: Ecology UST system inspections..... April 1, 1997 -- October 1, 1997
- Task C: Compile data into tank data base..... Completed within 45 days of  
receipt of final Ecology  
inspection report (Task B)
- Task D: Information request and data base update..... Annual: June 1998 --  
June 2002
- Task E (i): Fuel Systems Pollution Prevention Report..... Completed within 120 days of  
the conclusion of data base  
completion (Task C)
- Task E (ii): Fuel Systems Pollution Prevention Follow-up  
Reports..... Annual: October 1998 --  
October 2002