

Kenny, Ann

32 12-19-01
Kmet

From: Yee, Chung K.
Sent: Monday, September 11, 2000 3:32 PM
To: Fitzpatrick, Kevin
Subject: RE: Clean Fill Criteria Language for the 401 Water Quality Certification on the Sea Tac Third Runway

I just talked to Pete. He is concerned with the Arsenic limit. Because TCP did not do arsenic in the new stds, he think 20 is too high and it should be set at background. Background in Western Washington is 7 to 8. He think they should do ground water monitoring now, ongoing.

We also talked about the sampling frequency.

Paul Agid called and he wants to talk about clean fill requirements. I left him a voicemail. Do you want to do a conference call?

-----Original Message-----

From: Fitzpatrick, Kevin
Sent: Monday, September 11, 2000 2:36 PM
To: Yee, Chung K.; Marchioro, Joan (ATG); Luster, Tom
Subject: FW: Clean Fill Criteria Language for the 401 Water Quality Certification on the Sea Tac Third Runway

To all: Pete Kmet has provided some very sound recommendations for the final language on clean fill criteria in the 401 Certification (when and if we issue a 401 Certification for the project). His recommended changes appear in the attached document below.
Kevin

-----Original Message-----

From: Kmet, Peter
Sent: Monday, September 11, 2000 11:51 AM
To: Fitzpatrick, Kevin
Subject: RE: Clean Fill Criteria Language for the 401 Water Quality Certification on the Sea Tac Third Runway

Here are my comments. Make sure you open the attachment.

<< File: Clean Fill Criteria for 401 Certification.doc >>

-----Original Message-----

From: Fitzpatrick, Kevin
Sent: Friday, September 08, 2000 12:52 PM
To: Kmet, Peter
Subject: Clean Fill Criteria Language for the 401 Water Quality Certification on the Sea Tac Third Runway

DELIBERATIVE DOCUMENT CURRENTLY EXEMPT FROM PUBLIC DISCLOSURE

Pete: The following are additions that have been made to the 401 Certification language which are not reflected in the attached Word document below.

E6. It sounds like we are allowing the Port to use problem fill as long as the Port notify Ecology. I think the second sentence should exclude the use of inappropriate fill that may result in any potential impacts to waters of the state.

E7c.2.(b) Should include appropriate EPA databases and the first list should read as "Confirmed & Suspected Contaminated Sites Report"

E7c.2.(e) "The fill material shall be analyzed for the potential contaminant(s) identified in the environmental site assessment. At a minimum, fill material from all sites shall be analyzed for TPH and Priority Pollutants metals for compliance with MTCA method A soil cleanup levels in

WAC 173-340-740." In the absence of MTCA method A soil cleanup levels, the potential contaminants shall comply with MTCA method B "100 X Groundwater" soil cleanup levels."
[There is more to Method B than the 100 X standard. Also, we are in the process of changing that to another model and so this is no longer valid.] The sampling frequency . .

[NOTE: there are two method A cleanup tables, unrestricted and industrial soils. I'm assuming you mean unrestricted soil cleanup levels, which is why I added the reference. However, there is a problem with this language in that Method A does not have standards for all contaminants AND they are in the process of being changed. I wonder if you should instead cite natural background as the standard.]

[The reference to Method B makes no sense because Method B does not specify specific substances to analyze for. If I had to say anything here, I would say "contaminants with the potential to be in the fill material based on historical site use, available records and previous test data. For these contaminants the standard would have to be based on Method B soil cleanup levels in WAC 173-340-740. Again, there is a bit of a problem because the standards are changing.]

See if you want to add E7c.2.(f) after the sampling requirement table. This is a repeat of a sort since the term "environmental professional" is already used in couple of places.

(f) All work shall be performed by an environmental professional, with appropriate training, experience and expertise in environmental site assessment.

E7c.3. I don't think they know where the placement location yet. The location should be included in the as-builts to be submitted quarterly.

<< File: Clean Fill Criteria for 401 Certification.doc >>

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