

Water Resources Consulting LLC.

Peter Willing, Ph.D.

October 20, 2000

Mr. David McCraney
Port of Seattle
P.O. Box 1209
Seattle, Washington 98111

RE: SEPA DNS, SeaTac Aircraft Hydrant Fueling System

Dear Mr. McCraney,

Please accept this request on behalf of the Airport Communities Coalition for: 1) coordination of effort between the MTCA Agreed Order hydrology study, and 2) additional environmental analyses in connection with the aircraft fueling system.

Water Resources Consulting LLC has been engaged by the Airport Communities Coalition (ACC) to articulate its interests in the areas of surface and groundwater hydrology. The ACC itself represents several communities who are dependent on groundwater for their public water supplies in the area near SeaTac Airport. These communities also have highly valued streams and their associated riparian and wetland environments. They regard these resources as potentially affected by the Port's fuel hydrant construction project.

These comments are not an objection to the project itself, as it has the potential to bring about certain environmental advantages. However, the Port has the cart before the horse in terms of the relationship of the project to the Agreed Order under the Model Toxics Control Act. The Port is involved in a large state-supported effort to assess the degree of accumulated contamination from spills in the old fuel system. This project has the potential to confound the Agreed Order work, and aggravate existing contamination problems. The construction of the fuel system should be delayed until the Agreed Order hydrologic study can be completed. The Port needs to make an environmental full disclosure on this project, as the Declaration of Nonsignificance contains very little specific information of any use to neighboring communities. The DNS has a number of shortcomings we would like to enumerate.

The DNS claims that the Port intends to install a "state of the art" leak detection system; but other than this empty assurance, offers no useful information. The document does not inform the reader what the Port thinks a state of the art system is. Is it to consist of meter-to-meter flow comparisons, periodic pressure testing, vapor detection, or some combination of all of these? What will the operating pressures in the distribution system be? What provision has been made for pressure transients? What is the weakest link in the system, and what is being done to protect it? The DNS

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makes no attempt to answer these questions. The airport communities deserve more than the equivalent of "don't worry, everything will all be alright."

1903 Broadway
Bellingham, Washington
98225-3237 U. S. A.

Telephone 360-734-1445
FAX: 360-676-1040
email: pwilling@telcomplus.net

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The Port apparently intends to dig up and dispose of any contaminated soil that the construction crews encounter. Apparently the Port knows the locations and approximate amounts of some of the contaminated soils it will encounter, such as the UAL, Continental, Delta, NW, and Pan Am fuel systems. The Port needs to compile this information and distribute it to the interested public in a supplemental environmental analysis. The DNS says that "contaminated soil not excavated for construction may remain in place in accordance with MTCA interim TPH policy and development of site specific cleanup action levels." The Port's planned sequence of actions is totally inappropriate: State money is being invested in the hydrology study to find out what those site specific cleanup action levels are, and the Port is proposing that this fuel hydrant system will be long finished construction and be a fait accompli before the hydrology study is finished.

There is a substantial concern that if conventional construction methods are used for the hydrant system, utility trenches and gravel backfill will create preferential flow paths for existing contaminant plumes. Some of the trenching will be as deep as ten feet, which is enough to intercept groundwater in the perched aquifers of the site.

The Port needs to put this project on hold, finish the Agreed Order hydrology study under MTCA, prepare a supplemental environmental document that informs the public about important details in which it has a stake, and only then undertake to rebuild the hydrant system.

Sincerely,

Peter Willing, Ph. D.