

November 13, 2000

TO: John Wietfeld, Ching-Pi Wang

FROM: Roger Nye

SUBJECT: Information to Include in the "Questions-To-Port" List

The Agreed Order stipulates that the Port will research existing technical literature, environmental and geological reports, land-use data, airport historical information, and other appropriate documents. One purpose of this research is to identify known and potential (based on historical operations) areas of soil and groundwater contamination within the AOMA and its "near vicinity" (defined as approximately within ¼ mile of the AOMA as per Appendix 1).

The intent of the Agreed Order is to determine risks posed by the known and potential areas of contamination within the AOMA and "near vicinity" to drinking water wells and surface waters (receptors) near the airport. Since contamination in identified potential areas of contamination will not have been characterized, the modeling methodology of "particle tracking" is to be utilized in the evaluation of contaminant transport in groundwater from these potential areas.

On December 13, 1999 the Port presented me with a map showing a list of potential contaminated sites that were identified based on the Port's research. On February 7, 2000 I provided written comments to the Port that pointed out issues and objections regarding the Port's list of potential contaminated sites. The Port never responded to those comments, and during the October 4, 2000 meeting here with the Port, a map/list of the same "potential sites" was presented that was presented to Ecology December 13, 1999.

The issues regarding the Port's map/list of "potential sites" are as follows:

1. Potential historical sources of solvents weren't identified. The citizens researched Ecology archives and presented information to me, which indicated aircraft washing fluids containing 14% chlorinated solvents were historically drained away to outfalls and/or stored in unlined lagoons. A cleanup following the demolition of the United Airlines hangar appears to corroborate this information since the highest PCE values in soil were found coincident with a "settling pond" outside the hangar.
2. The potential sites identified by the Port appear to be based on "historical facilities" rather than "historical operations". Current facilities such as hangars and the Olympic tank farm that could have had releases from historical operations weren't considered.

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3. There are major former fueling facilities identified in various cleanup and environmental investigation reports from the airport that were not identified by the Port.
4. As per language the Port agreed to in the "Approach" section of the Responsiveness Summary, "any potentially significant contaminant sources within the operating airport outside the AOMA which, given the modeling results, could pose significant risk to the subject receptors through ground water flow" will be identified. It is not clear whether the Port's map/list includes this agreed-to work.

What is needed is an honest thorough effort to identify, based on historical operations of current and historical facilities, potential significant areas of contamination. It is not acceptable that the citizens could research information on the airport and identify potential contaminated sites that the Port doesn't identify. Once the potential areas of groundwater contamination have been identified, then the demonstration can be made through the Agreed Order or otherwise, whether or not these potential sites pose risks to the receptors.

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