



Port of Seattle

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DEPT. OF ECOLOGY

January 24, 2001

Mr. John Wietfeld
Washington Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Re: Port of Seattle
Seattle-Tacoma International Airport
MTCA Ground Water Study

Dear Mr. Wietfeld:

I have enclosed for your review minutes of the last Ecology – Port meeting concerning the STIA Ground Water Study that we are now conducting under MTCA Agreed Order 97TC-N112. Please call if you have any questions or comments. We are also awaiting any response Ecology might provide on the responses we sent in early December to the Ecology memos you provided to us at this November 16 meeting. Please let me know if we'll be hearing more on the issues discussed in those documents.

Sincerely,


Paul W. Agid
Senior Environmental Program Manager


Seattle-Tacoma
International Airport
P.O. Box 68727
Seattle, WA 98168 U.S.A.
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AR 023684

Memo

To: Paul Agid

From: Marilyn Guthrie 

CC:

Date: 1/23/01

Re: Meeting Notes - Agreed Order Status 11/16/00

Attendees:

Steve Alexander (Department of Ecology - DOE)

John Wietfeld (DOE)

Roger Nye (DOE)

Ching Pi Wang (DOE)

Elizabeth Leavitt (Port of Seattle)

Paul Agid (POS)

Marilyn Guthrie (POS)

Meeting:

It is Ecology's position that the current Agreed Order between Ecology and the Port of Seattle is a unique one. It currently only includes:

1. A Hydrogeologic Study and
2. A Review of the Fuel Operations Area

Usually an Order would include a mechanism to take the site through clean up. The Agreed Order will end with statement of groundwater contamination pathways and risks to identified receptors. If any follow up clean up is determined necessary, it will be undertaken by the Port outside the scope of this Agreed Order, probably as an Independent Action.

It is anticipated that after the Agreed Order is complete, other mechanisms such as VCP, etc. will be used to complete work at all sites. The Port expressed concern that once the Port completed the Agreed Order activities, Ecology might require additional actions on sites shown to pose no MTCA risks. The

Port indicated that VCPs would be submitted on major sites and Independent clean ups would be completed if additional action were necessary. Ecology conceptually agreed with this approach.

It is also important to Ecology that the scope of the Agreed Order does not become enlarged as the project progresses. Scope creep must not happen. The need for flow model boundaries that extend beyond identified potential receptors, and that establish technically desirable boundary conditions were discussed. Ecology is unsure of validity of using new 3rd RW geotechnical wells for ground water level measurement in context of task to measure water levels from a select subset of wells. Is this scope expansion? (Response is included in response to two memos, submitted to Ecology in December 2000.)

The Hydrogeologic study covers the area outside the Airport Operations and Maintenance Area (AOMA). Therefore, the model covers an area outside the AOMA. This also needs to be memorialized in a letter to Ecology. (Response to Ecology memoranda of study status and questions on "potential sites" was provided to Ecology in December 2000 and is also well defined in the response summary.)

The set of receptors were mutually agreed to by the Port and Ecology, and are listed in the Agreed Order.

All sites (contaminated source areas) involved in the agreed order should be agreed upon by both the Port and Ecology. This needs to be memorialized in a letter to Ecology. A November 15, 2000 letter and a second letter dated November 13, 2000 were handed out during the meeting listing Ecology's understanding of the items completed and not completed on Agreed Order 97TC-N122. Responses to those letters were provided to Ecology in December 2000.

Ecology is requesting that the Port go forward with its modeling efforts as soon as possible. The Port is currently limited by not having Ecology approvals to proceed and by lack of sufficient Commission Authorization for expenditures. Currently, lack of Ecology technical approval and lack of commission approval of needed additional funding will prevent the Port of Seattle from going forward with modeling effort until at least March 2001. The status of the model is that the computer flow models have been set up, but Fate & Transport and particle tracking models have not.

Ecology also expressed it's current shortage of resources, specifically staffing shortages, would limit its level of activity as well.

Public Participation plan:

Response summary and Airport newsletters.

Page 6 of The Public Participation Plan indicates that a Workshop will occur after the report on the results of Phase I activities and the Addendum to the Agreed Order describing proposed Phase II activities are complete. Ecology believes that the Public should be more involved in general, and in response the Port expressed concern about public involvement beyond the scope of the of the Agreed Order, cost of scope control, and our ability to be open while in litigation with certain Public groups. Ecology is requesting additional public workshops to review the responsive summary, changes in scope and progress on modeling and other issues.

Fuel System database set up complete. Inspections by Ecology ongoing.

Steve Alexander requested a schedule in the form of a time line (gant chart), which includes Public Participation events. (POS will provide once any scope changes are agreed to and approvals to run the models are granted.)

Steve Alexander has requested that he be included in commission meetings.

Comments to consider:

If it is better to modify the scope by amending the scope and sending it out for public comment than to have Ecology and the Port exchanging letters, then we should amend the scope. Paul suggests adding any additional scope changes to those already shown in the Responsive Summary. Therefore, there would be only one set of changes to the original proposed Scope of Work.

Thanks! Please call me if you have questions.

Marilyn Guthrie
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