



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
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 INFORMATION**

DEC 20 2001

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OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL** # of pages = 3

To <i>Ann Kenny</i>	From <i>Navy BD</i>
Dept./Agency	Phone #
Fax # <i>425-649-7098</i>	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Subject: Monitoring Plan for Embankment Fill Seepage, Master Plan Update Endangered Species Act Consultation (1-3-00-F-1420)

Dear Mr. Lynch:

Thank you for your letter and monitoring plan dated August 10, 2001. I apologize for the delay in responding to you with our comments on the plan. Our comments and questions are as follows:

1. Pg. 1, 1.0 Introduction and Background, first paragraph: The monitoring plan should address both seepage quality and quantity. Currently, the monitoring plan only addresses seepage quality.
2. Pg. 1, 1.0 Introduction and Background, second paragraph: The plan proposes to begin monitoring the quality of seepage following completion of the entire embankment. Monitoring of the seepage should begin when the first seepage occurs, which may be prior to completion of the embankment.
3. Pg. 2, 3.0 Tiered Location Monitoring Strategy: Groundwater may be a pathway by which contaminated water from the embankment may enter the aquatic environment. Are any ground water wells proposed for use in monitoring? If not, explain why.
4. Pg. 2, 3.0 Tiered Location Monitoring Strategy, Tier 1: Should seepage water exceed the criteria established in the Biological Opinion for this project, measures to collect, treat and/or dispose of the seepage may be required.
5. Pg. 2, 3.0 Tiered Location Monitoring Strategy, Tier 2, first sentence: Delete "over time".

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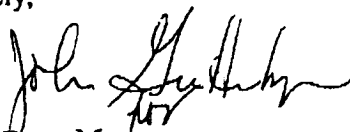
Exhibit-2046

6. Pg. 3, 4.0 Tier 1 Monitoring Location, second paragraph: Please provide the rationale for the number of seepage locations proposed for Tier 1 monitoring. Please indicate why the number selected is sufficient to adequately determine the seepage quantity and quality.
7. Pg. 3, 4.0 Tier 1 Monitoring Location, second paragraph: A revised list of monitoring locations must be provided to us once they are determined, (if different from the proposed locations). Notification of any changes to the monitoring locations, and the rationale for these changes must be provided to us within 30 days of the modification.
8. Pg. 3, 5.0 Monitoring Schedule: As stated earlier, monitoring of the seepage should begin when it first occurs, which may be prior to embankment completion.
9. Pg. 3, 6.0 Chemical Constituents: In addition to the chemical constituents proposed for analysis, please also include the following: metal scan; organochlorine scan; one of the following: polyaromatic hydrocarbons, total petroleum hydrocarbons, aliphatic and aromatic scan, or oil and grease; other airport related or generated compounds (i.e., deicers such as glycols, solvents); priority pollutants; dissolved oxygen; and turbidity.
10. Pg. 4, Stage 1: Surface Water Quality Criteria, last sentence: The Port must obtain our approval if a modification to screening the seepage is proposed.
11. Pg. 4, Stage 2: Site-specific dilution/attenuation factor, first paragraph, last sentence: The Port must obtain our approval if changes to the dilution factors are proposed.
12. Pg. 4, Stage 2: Site-specific dilution/attenuation factor, second paragraph, first sentence: The dilution factor of 10 may be inappropriate for evaluating the constituent concentrations from the seepage. The dilution factor stated in the National Oceanographic and Atmospheric Administration's (NOAA) Screening Quick Reference Tables is based on water samples removed from wells, rather than collected from surface water (M. Buchman, NOAA, pers. com.). The Port must provide documentation to us to support any proposed dilution of seepage water samples collected.
13. Pg. 4, Stage 3: Bioassay Testing: If Tier 1 seepage samples exceed appropriate water quality criteria, appropriate bioassays should be performed (i.e., sea water challenge or smoltification bioassays for salmonids). Both sublethal and lethal effects are of concern.
14. Pg. 4, Stage 3: Bioassay Testing: The Port must obtain our approval on the bioassay testing plan if it is to be performed.
15. Pg. 5, Stage 3: Bioassay Testing, first full paragraph: The Port must obtain our approval if they elect to skip Stages 2 and 3 of the Tier 1 screening process and go directly to Tier 2.

16. Pg. 5, 8.0 Sampling Methods: Why are only seeps with flow rates in excess of 0.5 liters per minute to be sampled?
17. Pg. 5, 9.0 Sample Analysis Methods: Please ensure that any analytical methods utilized in the monitoring program have appropriate detection limits (i.e., low enough) to enable interpretation of results against the appropriate toxicological standards or thresholds of concern.
18. Pg. 6, 11.0 Reporting: Any exceedances shall be reported to us as soon as they have been determined.
19. Pg. 6, 11.0 Reporting, second paragraph: If modifications to the monitoring plan are proposed, the Port must obtain our approval prior to initiating any revisions.
20. Pg. 6, 11.0 Reporting, second paragraph, last sentence: The Federal Aviation Administration, rather than the Port, would be responsible for reinitiating consultation with us.

If you have any questions regarding our comments, please contact Nancy Brennan-Dubbs, of my staff, at (360) 753-5835.

Sincerely,



Ken S. Berg, Manager  
Western Washington Fish and Wildlife Office

c: NMFS, Lacey (S. Landino)  
DOE, Bellevue (A. Kelly)