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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

November 30, 1995

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Reply to
Attn of: HW-106

Mr. John Stiller
Philip Environmental, Inc.
955 Powell Avenue S.W.
Renton, WA 98055-2908

Re: Abandonment and Replacement of Monitoring Wells CP-105A and CP-105B at the Philip Environmental Pier 91 Facility
WAD 00081 2917

Dear Mr. Stiller:

This correspondence is in response to the Philip Environmental letter dated November 15, 1995, requesting the Environmental Protection Agency (EPA) Region 10 and the Washington State Department of Ecology (Ecology) acknowledge the work proposed involving monitoring wells CP-105A and CP-105B.

Pursuant to paragraph 36 of the 1990 agreed order, docket number 1089-11-06-3008(h), EPA hereby concurs with Ecology's recommendations and approves your request of abandonment and replacement of the above monitoring wells.

If you have any questions, please contact Sally Safioles at (206)649-7026.

Sincerely,

Diane Richardson

Diane Richardson
RCRA Permits Team

cc: Doug Hotchkiss, Port of Seattle
Mike Torpy, Pacific Northern Oil Company

USEPA RCRA
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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

November 16, 1995

Mr. John Stiller
Philip Environmental, Inc.
955 Powell Avenue S.W.
Renton, WA 98055-2908

Dear Mr. Stiller:

Re: Abandonment and Replacement of Monitoring Wells CP-105A and CP-105B at the Burlington Environmental Inc.(dba Philip Environmental) Pier 91 Facility; WAD000812917

This correspondence in response to the Philip Environmental (Philip) request submitted to the U.S. Environmental Protection Agency Region 10 Office (USEPA) and the Washington State Department of Ecology (Ecology) dated November 15, 1995. Philip requests that the agencies acknowledge the work proposed involving monitoring wells CP-105A and CP-105B.

Ecology is in the process of transferring the corrective action authority for this facility from the USEPA; however, at this point the transfer is not complete. Until then, it will be necessary for Philip to continue to meet the requirements of the existing 3008(h) Order for RFI activities. To minimize any confusion and to aid in the transfer, Ecology will become the contact for Philip and will coordinate with USEPA on issues involving the continuing corrective action for the Pier-91 facility. Ecology will respond to Philip on issues such as this request. But until the transfer of the corrective action is complete, EPA will be sending a cover letter along with Ecology's comments.

Based on the information provided and the lack of any restriction imposed by the existing 3008(h) Order, our recommendations are listed below:

Well Placement: The proposal indicates that the replacement wells will be within 30 feet north-northeast of the existing location. This well cluster has been designated as upgradient for this site. RCRA requires that an upgradient or background well for each aquifer system be established. At Pier 91, there are two aquifer systems with two different flow directions. Additional upgradient wells may be required at a future date when

additional information or investigations are conducted at the site. Additional wells may also be beneficial to determine the extent of contamination coming on-site.

Soil Characterization: The proposal indicates that soil samples will be preserved for possible physical testing. It is recommended that the samples are tested for physical properties as outlined in the approved RFI Workplan for both aquifer and aquitard units.

If you have any questions regarding the comments and recommendations, please call me at (206) 649-7026.

Sincerely,

Sally Safioles

Sally Safioles
Hydrogeologist
Hazardous Waste and Toxics Reduction Program

cc: Doug Hotchkiss, Port of Seattle
Mike Torpy, Pacific Northern Oil Company