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DEPARTMENT OF ECOLOGY
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July 30, 2021

Adam Reese
Principal Engineering Geologist
Earth Engineers, Inc.
2411 S.E. 8th Avenue
Camas, WA 98607
adam@earth-engineers.com

Re: Geotechnical Exploration and Test Pits Investigation Approval Letter

- **Site:** Hambleton Bros Log Yard
- **Address:** 335 South A Street, Washougal, WA 98671
- **Facility ID#:** 4399598
- **Cleanup Site ID#:** 2482

Dear Adam Reese,

Following the remedial action at the Hembleton Bros Log Yard Site, some diesel-and-oil-range total petroleum hydrocarbons (TPH-D and TPH-O) contaminated soils exceeding the Model Toxics Control Act (MTCA) Method A cleanup levels were left on the Site at two locations and the contaminated areas were capped with asphalt caps. In addition, the TPH-D and TPH-O concentrations in the groundwater were also exceeded the MTCA Method A cleanup levels. The Port of Camas (POC) recorded an Environmental Covenant (EC) on the property on July 1, 2015, and the Department of Ecology (Ecology) issued a no further action (NFA) letter on August 6, 2015, with long term groundwater monitoring.

Ecology's review of the results of long term groundwater monitoring indicates that the TPH-D and TPH-O concentrations are gradually increasing in monitoring well MW-7 from September 2011 through April 2021. The TPH-D concentrations increased from 588 µg/L to 1440 µg/L and TPH-O concentrations increased from 591 µg/L to 1080 µg/L. The MTCA Method A cleanup level for TPH-D and TPH-O is 500.

Ecology has reviewed your proposal of June 28, 2021, and additional information of July 23, 2021, regarding drilling four to five geotechnical exploration borings and installation of seventeen test pits on the Site to assess the geotechnical properties of the fill and native materials beneath the Site. Ecology understands that the geotechnical borings will be abandoned as per the requirements of the Washington Administrative Code

(WAC) 173-160-460¹ by back filling with bentonite chips or hydrated bentonite slurry and the upper 12 to 18 inches of boring holes will be sealed with either the asphalt or clean soil depending on location of the boring. Since all the test pits will be excavated outside of the contaminated area, the test pits will be backfilled with the excavated material from the pit and will be restored to the original/surrounding conditions. In addition, the exploration approach will follow all of the requirements of the Site's Soil Management and Cap Maintenance Plan (SMCMP) dated March 16, 2015. Ecology understands that the Port of Camas (Port) is conducting these activities as part of the property development plans.

Ecology is here by approving your proposal for drilling geotechnical exploration borings and the installation of tests pits contingent upon the following:

- If any indication of soil contamination observed during the excavation of test pits, work must be stopped and you must contact Ecology for further guidance.
- This approval is for drilling geotechnical borings and installing test pits only. The Port must contact and coordinate with Ecology for obtaining approval for any future property development activities at the Site.
- Since the TPH-D and TPH-O concentrations are increasing in MW-7 (located at the southern edge of one of the capped areas) as stated above, Ecology highly recommends that the Port do not propose/build any building on the capped area. If TPH-D and TPH-O concentrations continues to increase and if an active soil and/or groundwater remedy is warranted in the future, the building may obstruct the implementation of any active soil and/or groundwater remedy.

If you have any questions this approval, please call me at (360) 999-9603.

Sincerely,



Panjini Balaraju, P.E.
Toxics Cleanup Program
Southwest Regional Office
(360) 999-9603 (cell)
(360) 407-6335 (office)
Pbal461@ecy.wa.gov

cc: Mark Miller, Port of Camas, markm@portcw.com
Dennis Terzian, PBS Environmental, Dennis.Terzian@pbsusa.com
Rich Darland, PBS Environmental, Rich.Darland@pbsusa.com
Ecology Site File

¹ <https://apps.leg.wa.gov/wac/default.aspx?cite=173-160-460>