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September 14, 2021

David Ripp
Chief Executive Officer
Port of Camas-Washougal
24 South 'A' Street
Washougal, WA 98671
david@portcw.com

Re: Property Development/Building Construction on the Log Pond Area, Approval Letter

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

Dear David Ripp,

This is a follow-up letter to the Department of Ecology's (Ecology) letter of July 30, 2021, regarding Geotechnical Exploration and Test Pits Investigation as a part of the property development activities at the Site. This letter supersedes Ecology's July 30, 2021 letter.

Ecology's July 30, 2021, letter was based on the existing groundwater data collected as part of the long-term groundwater-monitoring plan for the Site. These data indicated increases in diesel-and-oil-range total petroleum hydrocarbons (TPH-D and TPH-O) concentrations in the groundwater above the Model Toxics Control Act (MTCA) Method A Cleanup Levels. In particular, Ecology was concerned about increase in TPH-D [1,440 micrograms per liter (µg/L)] and TPH-O (1,080 µg/L) concentrations in the groundwater sample collected from MW-7 during the most recent (April 2021) sampling event. During a teleconference on August 9, 2021, to discuss these data, it was suggested that the high TPH-D and TPH-O results may have been a result of poor sampling technique (use of a bailer due to low volume of water in the well) leading to higher turbidity in the sample. It was agreed that a new sample would be collected to verify the previous results.

Monitoring well MW-7 was resampled on August 17, 2021, using-low flow sampling methods. These results indicated a combined (TPH-D+TPH-O) TPH concentration of 653 µg/L. In addition, the sample was also analyzed for TPH using the silica-gel cleanup method. The result indicated no TPH detected above detection limits. This may suggest that the surrounding

groundwater has high, naturally occurring organic carbon that may be contributing to the TPH concentration in the groundwater. Total and dissolved organic carbon were also analyzed and the results [9 milligrams per liter for both (mg/L)] also suggest high organic carbon at the Site. These data were discussed at a follow-up teleconference on August 31, 2021, and it was agreed that the results were likely representative of Site conditions and that the planned development of the Site can move forward. It was also decided that future long-term groundwater sampling events will include sampling for TPH-Dx and TPH-O with and without silica-gel cleanup as well as total and dissolved organic carbon.

In addition, Ecology reviewed the Cleanup Action Plan (CAP) and Soil Management and Cap Maintenance Plan (Maul Foster & Alongi, May 13, 2015). Construction of a building/structure on the log pond area as one of the capping options considered in the CAP (page 16) and the Soil Management and Cap Maintenance Plan (Table, page 6).

Based on the above information, it is Ecology's opinion that:

- The Port of Camas can construct/build a building/structure on the capped log pond area.
- Future use, management, and handling of soils remaining on the Site, including the soil generated during the property development activities could be handled as per the procedures outlined in the Soil Management and Cap Maintenance Plan.
- As required by the Compliance Monitoring Section of the CAP (Section 6.2) and the Groundwater Monitoring Plan (Maul Foster Alongi, March 15, 2015, Appendix I, Construction Completion Report, May 13, 2015) the groundwater monitoring must be conducted on an 18-month schedule. To be consistent with the August 17, 2021 analysis, analyze the groundwater samples for TPH-Dx and TPH-O with and without silica-gel cleanup, and for total and dissolved organic carbon.

If you have any questions or need clarification regarding this letter, please contact me at (360) 999-9603 (cell).

Sincerely,



Panjini Balaraju, P.E.
Toxics Cleanup Program
Southwest Regional Office
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cc: Mark Miller, Port of Camas-Washougal, MarkM@portcw.com
Rebecca Lawson, Ecology rebecca.lawson@ecy.wa.gov
Ecology Site File