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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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January 17, 2001

Mr. Thomas Hughes
Department of the Navy
Engineering Field Activity, Northwest
Naval Facilities Engineering Command
19977 7th Avenue NE
Poulsbo, WA 98370-7570

Dear Mr. Hughes:

Re: No Further Action Determination at FISC Site 303/304

The Washington State Department of Ecology (Ecology) works in conjunction with the Engineering Field Activity, Northwest (EFA, NW) to restore the air, land, and water resources of the State of Washington at United States Navy sites. Manchester Fleet and Industrial Supply Center (FISC) Sites 303 and 304 are two of these sites. Ecology has been requested by EFA, NW to determine if the appropriate level of investigation, remediation, and monitoring has occurred at Sites 303 and 304 to ensure that any hazardous conditions stemming from past military activities have been addressed. Ecology appreciates the level of effort that went into the characterization of historical petroleum contamination that is present at this site and generally agrees with the conclusions reached in this report.

Ecology's Toxics Cleanup Program has reviewed relevant information, including the report entitled "Groundwater and Sediment Characterization at Sites 303 and 304 FISC Fuel Department - Manchester, Washington", regarding Manchester Fleet and Industrial Supply Center Site 303 and 304, located one mile north of Manchester in Kitsap County, WA. Ecology has reviewed the investigation and monitoring of historical releases at the Manchester FISC Sites 303 (D-Tunnel Tanks) and 304 (Industrial Area). This work was performed in order to demonstrate that petroleum contamination has not had an impact to groundwater and adjacent sediments sufficient to trigger the need for remedial actions.

Groundwater samples were screened against marine surface water criteria, Chapter 173-201A WAC, and sediment samples were screened against marine sediment cleanup standards of the Sediment Management Standards, Chapter 173-204 WAC. Monitoring samples collected following remedial activities were obtained to ensure that petroleum hydrocarbons are not migrating from the site to the marine environment, as required by the Washington State Department of Ecology Model Toxics Control Act Cleanup Regulation, Chapter 173-340 WAC.

Although petroleum contamination continues to exist in upland soils, the investigation of Sites 303 and 304 demonstrates that there is a lack of impact to marine sediments and marine surface water that would warrant sediment or groundwater remedial actions. While discharges of petroleum hydrocarbons to the marine environment do not appear to pose a threat to human health or the environment, there continues to be the need for institutional controls which would prevent exposure to residual soil contaminants.

The current use of the property is industrial and this usage is going to continue as a fuel storage facility for the foreseeable future. Ecology understands that a change in property ownership or land use would cause consultation with Ecology concerning the need for remedial actions, and this is ensured through requirements in a document to be placed in official property records. Those remaining areas of concern will also be identified on the Fuel Department Facility Map as well as specified in facility instructions which workers will be required to follow prior to digging.

The reports reviewed by Ecology for this site were prepared without Ecology oversight such as would occur under an Agreed Order or Consent Decree. Based on the information provided in these reports and site visits, Ecology is issuing the determination that no further action is necessary due to conditions stemming from past military activities at Site 303/304 under the Model Toxics Control Act (MTCA), Ch. 70.105D RCW. This No Further Action (NFA) determination is based on Ecology's review of relevant remedial action reports and subsequent monitoring which indicates that contaminants found during investigation of this property were either properly remediated or do not pose a risk to human health or the environment. Although Ecology is issuing a determination that no further action appears to be necessary to protect human health and the environment, this determination does not release you from any obligation to comply with reporting requirements that may exist in a permit or under other laws.

Ecology's no further action determination is made only with respect to the information in the reports reviewed. This no further action determination applies only to Sites 303 and 304 described in the reports. It does not apply to any other release or potential release at this property, nor any other properties owned or operated by the U. S. Navy.

Please note that, although this letter is a determination of no further action at this time, the investigation and/or remedial actions were not conducted under a consent decree with Ecology. This letter is not a settlement by the state under RCW 70.105D.040 (4).

Ecology does not assume any liability for any release, threatened release or other conditions at Site 303/304, or for any actions taken or omitted by any person or his/her agents or employees with regard to the release, threatened release, or other conditions at the site. Ecology reserves the right to require further action at the site if new or different information becomes known or available.

Since hazardous materials remain in the soil at Site 303 at levels which exceed MTCA cleanup levels, Ecology will review the cleanup activities at the entire facility no less frequently than

every five years to ensure protection of human health and the environment (WAC 173-340-420). Ecology recommends that warnings be posted for workers at Site 303 to guard against exposure to residual petroleum contaminated soil. Ecology would also appreciate copies of the Fuel Department Facility Map after it is updated to indicate residual contamination, the facility instructions which will require checking the area of any future excavation, and the document in the official property records which requires consultation with Ecology prior to disposal.

If you have any questions or concerns about this letter, please call me at (360) 407-7244.

Sincerely,



Guy Barrett, Project Manager
Toxics Cleanup Program

GB:gj

cc: Mr. Michael Tucker, FISC Manchester