



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

May 31, 2022

Heather Gadwa  
GHD  
9725 3<sup>rd</sup> Avenue NE, Ste. 204  
Seattle, WA 98115

**Re: Opinion on Proposed Preliminary Investigation Work Plan for the following Site:**

- **Site Name:** Columbus Square
- **Site Address:** 614 S. Columbus Avenue, Goldendale
- **Facility/Site ID No.:** 81593498
- **Cleanup Site ID No.:** 6704
- **VCP Project No.:** CE0536
- **Work Plan Title:** Preliminary Remedial Investigation Report and Work Plan

Dear Heather Gadwa:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed investigation of the Columbus Square Site (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

**Issue Presented and Opinion**

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Is the proposed Preliminary Investigation Work Plan likely sufficient to refine the conceptual site model at the Site?

**YES. Ecology has determined that the proposed preliminary investigation work plan will likely be sufficient to refine the conceptual site model necessary to perform remedial actions and/or assess compliance with the cleanup standards at the Site. Therefore, this work plan is approved.**

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

## Description of the Site

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This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Gasoline range organics, ethylbenzene, total xylenes, naphthalene into the Soil.
- Gasoline range organics, diesel range organics, and lead into the Ground Water.

Please note a parcel of real property can be affected by multiple sites.

At this time, we have no specific information that the parcel(s) associated with this Site is conclusively affected by other sites. However, commingled groundwater contamination is suspected based on the prevalent easterly groundwater flow direction: east-southeast (2012 & 2013), north-northeast (2015), and east-northeast (2021). Note that the generalized groundwater flow direction may not account for possible migration along the subsurface utility backfill.

## Basis for the Opinion

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This opinion is based on the information contained in the following documents:

1. TerraGraphics Environmental Engineering, Inc. "*FINAL Environmental Site Assessment Report.*" October 16, 2012
2. TerraGraphics Environmental Engineering, Inc. "*FINAL 2013 Supplemental Environmental Site Assessment Report.*" March 4, 2014
3. Shannon & Wilson, Inc. "*Environmental Site Assessment, South Columbus Avenue Properties.*" June 24, 2014
4. TerraGraphics Environmental Engineering, Inc. "*Final 2015 Supplemental Environmental Site Assessment Report.*" December 18, 2015
5. GHD Services, Inc. "*Preliminary Remedial Investigation Report and Work Plan.*" May 6, 2022

A number of these documents are accessible in electronic form from the Site webpage<sup>1</sup>.

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/6704>

The complete records are stored in the Central Files of the Central Regional Office of Ecology (CRO) for review by appointment only. Visit our Public Records Request page<sup>2</sup>, to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at [publicrecordsofficer@ecy.wa.gov](mailto:publicrecordsofficer@ecy.wa.gov) or 360-407-6040.

This opinion is void if any of the information contained in those documents is materially false or misleading.

### **Analysis of the Proposed Investigation Work Plan**

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Ecology has concluded that, upon completion of your proposed investigation, though it is likely sufficient to refine the conceptual site model, **further remedial action** will likely be necessary to meet compliance with the cleanup standards at the Site. That conclusion is based on the following analysis:

1. Approval of proposed work plan for refining the conceptual site model is based on the following:
  - 1) Provides for the assessment of the vapor intrusion exposure pathway for the contaminants of concern at the Site. Three sub-slab soil Vapor Pins<sup>®</sup> will be installed and the soil gas will be sampled.
  - 2) Proposes two borings and associated sampling that are positioned to interpolate the east boundary of the contamination at the downgradient portion of the property.
  - 3) Proposes a temporary monitoring well along with associated sampling at a location south-southwest of MW-2 and BH-7. This boring is positioned to assess the upgradient portion of the groundwater plume at the Columbus Square Site.
  - 4) Provides for additional groundwater monitoring to assess the contaminant concentration trend at the property.
  - 5) Proposes a GPR survey and the use of a vacuum truck to confirm the presence or absence of an UST that may have been abandoned at the southwest corner of the property near boring BH-2. A previous GPR survey showed the presence of a magnetic anomaly indicating the likely presence of a tank. A soil boring will be completed if the UST is not present.

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<sup>2</sup> <https://ecology.wa.gov/Footer/Public-records-requests>

- 6) Proposes two borings and associated sampling to collect additional soil data in the vicinity of historical impacts near BH-1 and BH-10.
2. Two other petroleum hydrocarbon sites exist in close proximity to the Columbus Square Site. Either or both sites may be contributing contaminant source mass in proximity to the Columbus Square property as suggested in the attached site diagram. If so, then any commingling of groundwater contamination may likely contribute to fluctuation in contaminant concentrations above the applicable MTCA Method A cleanup levels at the Site.

Note that this work plan does not assess whether contaminated groundwater has migrated within the utility trench backfill. There is the possibility that the utility trench backfill may provide a more permeable pathway than the surrounding subsurface soil matrix, which is fine-grained.

### **Limitations of the Opinion**

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#### **1. Opinion does not settle liability with the state.**

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

#### **2. Opinion does not constitute a determination of substantial equivalence.**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action.

This opinion does not determine whether the action you proposed will be substantially equivalent. Courts make that determination. See RCW 70A.305.080 and WAC 173-340-545.

**3. Opinion is limited to proposed cleanup.**

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

**4. State is immune from liability.**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170.

**Contact Information**

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Thank you for choosing to clean up your Property under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may resubmit your proposal for our review. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our VCP webpage<sup>3</sup>. If you have any questions about this opinion, please contact me by phone at (509) 731-9613 or e-mail at [John.Mefford@ecy.wa.gov](mailto:John.Mefford@ecy.wa.gov).

Sincerely,



John Mefford  
Toxics Cleanup Program  
Central Regional Office

Enclosure: Site Diagram

cc: John Kusky  
Doug Frantum, Public Works Supervisor, City of Goldendale

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<sup>3</sup> [www.ecy.wa.gov/vcp](http://www.ecy.wa.gov/vcp)

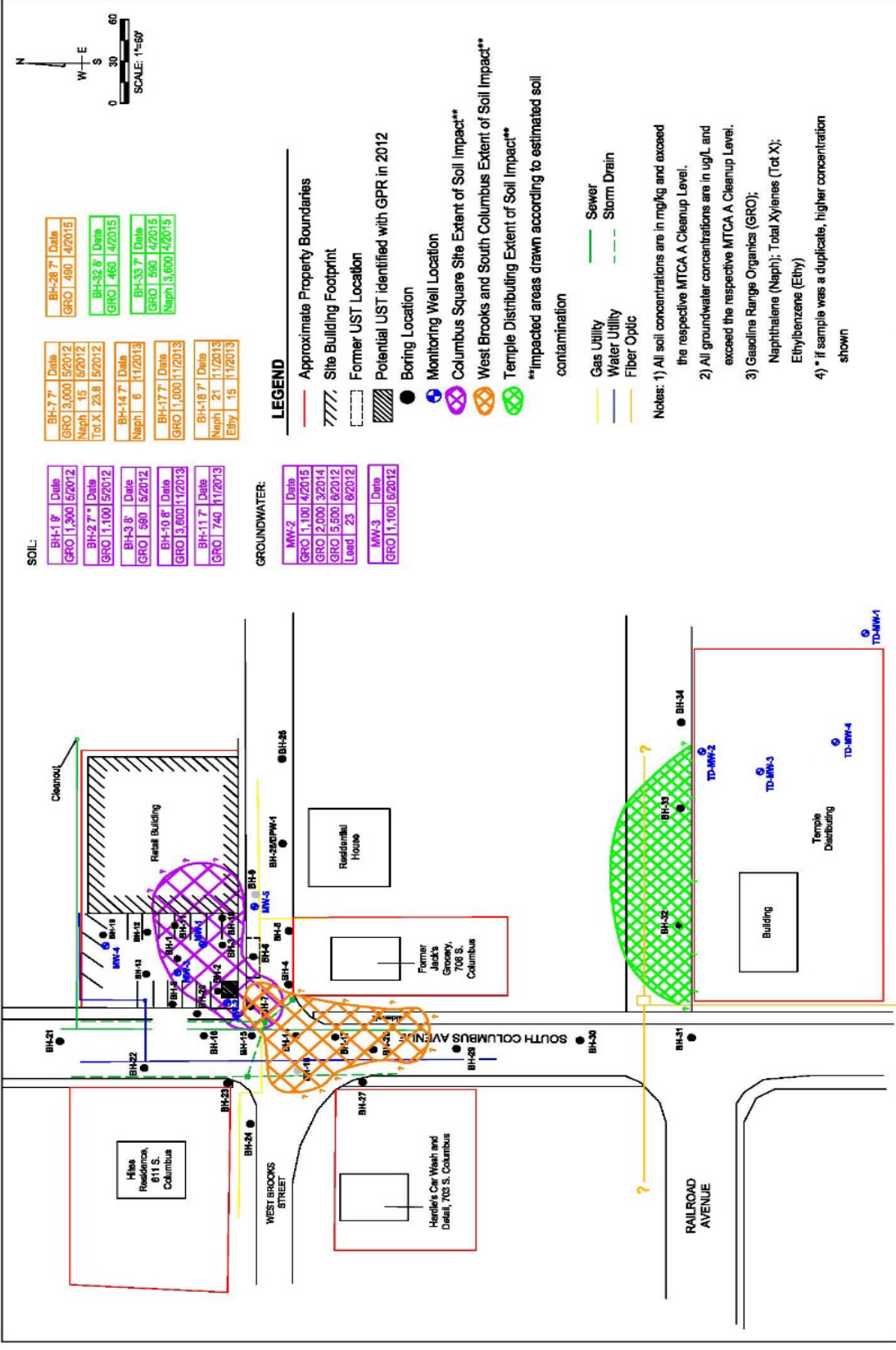


Enclosure

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**Site Diagram**





**SOIL:**

BH-1 0'	Date	4/20/12
GRO 1,300	5/20/12	
Naph 15	5/20/12	
Tot X 23.6	5/20/12	
BH-2 7'	Date	5/20/12
GRO 1,100	5/20/12	
BH-3 8'	Date	5/20/12
GRO 590	5/20/12	
BH-10 8'	Date	11/20/13
GRO 3,000	11/20/13	
BH-11 7'	Date	11/20/13
GRO 740	11/20/13	
BH-14 7'	Date	4/20/15
GRO 460	4/20/15	
Naph 6	11/20/13	
BH-17 7'	Date	4/20/15
GRO 590	4/20/15	
Naph 19	11/20/13	
BH-18 7'	Date	11/20/13
GRO 1,000	11/20/13	
Naph 21	11/20/13	
Ethy 19	11/20/13	
BH-26 7'	Date	4/20/15
GRO 460	4/20/15	
BH-32 8'	Date	4/20/15
GRO 460	4/20/15	
Naph 33 7'	Date	4/20/15
GRO 3,600	4/20/15	
Naph 3,600	4/20/15	

**GROUNDWATER:**

MW-2	Date	4/20/14
GRO 1,100	4/20/14	
GRO 2,000	3/20/14	
GRO 5,600	6/20/12	
Lead 23	6/20/12	
MW-3	Date	6/20/12
GRO 1,100	6/20/12	

- LEGEND**
- Approximate Property Boundaries
  - Site Building Footprint
  - Former UST Location
  - Potential UST identified with GPR in 2012
  - Boring Location
  - Monitoring Well Location
  - Columbus Square Site Extent of Soil Impact\*\*
  - West Brooks and South Columbus Extent of Soil Impact\*\*
  - Temple Distributing Extent of Soil Impact\*\*

\*\*Impacted areas drawn according to estimated soil contamination

- Gas Utility
- Water Utility
- Fiber Optic
- Sewer
- Storm Drain

Notes: 1) All soil concentrations are in mg/kg and exceed the respective MTCA A Cleanup Level.  
 2) All groundwater concentrations are in ug/L and exceed the respective MTCA A Cleanup Level.  
 3) Gasoline Range Organics (GRO); Naphthalene (Naph); Total Xylenes (Tot X); Ethylbenzene (Ethy)  
 4) \* if sample was a duplicate, higher concentration shown

<p><b>TerraGraphics</b> Environmental Engineering, Inc. www.terragraphics.com</p>	<p>PRINT DATE: August 26, 2015</p>	<p>PROJECT NUMBER: 13072</p>	<p>PROJECTION: UTM NAD 83, Zone 10N</p>	<p>PROJECT MANAGER: M. Prosser</p>	<p>CARTOGRAPHER: M. Stader</p>	<p>PROJECT NAME: Columbus Square 614 South Columbus Avenue Caldwell, WA 98620</p>	<p>FIGURE 3 Soil and Groundwater Locations with Results Above MTCA Method A Cleanup Levels</p>
	<p>Scale: 1"=50'</p>						