Dave Schettler, PE Schettler Civil Engineering Services LLC (for Construction Special Inspections)

57 Wedge View Ln Leavenworth, WA 98826 Phone: (509) 669-5469

December 20, 2023

Attention: Mary Monahan

Department of Ecology

Toxics Cleanup Program-Central Regional Office
1250 West Alder Street
Union Gap, WA 98903

RE: VCP Project No: CE0509, Lake Chelan Community Hospital, Facility/Site ID: 66314
Response Document to Ecology - Mary Monahan's letter dated Dec. 13, 2023
on requested list of more information to be provided for review of VCP Opinion
for a No Further Action Determination

Hello,

This letter is following up on our team meeting on Nov. 15, 2023 in response to your requested list as per your letter dated December 13, 2023 of additional items needed to complete the VCP opinion for the Lake Chelan Hospital Site. Below is my responses to the list of information requested as identified from that letter:

A figure that clearly details where areas of either or both parcels have been remediated.
 The figure should include the following elements-stormwater features and locations, clear delineation of where capping was completed, identification of type of hard cap or use of soft capping for landscaping, parcel boundaries and approximate volumes and concentrations of contamination left beneath any capping.

Response: Figure A - C1.3 Storm Water Plan is attached and has been modified to show both parcel property line boundaries and identifies the south parcel, 110 S. Apple Blossum Road, parcel no 27231867013, as having been remediated with all surfaces of the parcel either covered with soft capping of 12-inches of clean soil with underlying geotextile material or hardscaped with pavement for roadways and parking, concrete sidewalks, or newly constructed building for the hospital. Figure C1.3 clearly details where capping has been completed and identifies the types of hard cap as either building structure, asphalt pavement, concrete sidewalks, and soft capping of geotextile with 12-inches of imported clean soil capping. Figure C1.3 also calls out the approximate volumes and concentrations of contamination left beneath the capping for the total area of the remediated parcel (parcel no. 27231867013).

2. If soils have been imported to complete any soft capping, sampling should have been conducted on the imported soils to assure that concentrations of contamination do not exceed MTCA cleanup levels.

Please provide any documentation you may have regarding these items. In lieu of sampling data, you may provide final sampling data for all soft capped areas that show concentrations of contamination that are below 20 mg/Kg for arsenic and 250 mg/Kg for lead.

Response: All soil that was imported to complete soft capping for this project for the whole hospital site parcel at 110 S. Apple Blossum Road (parcel no 27231867013) was documented as being supplied from Chelan Sand & Gravel's site at 879 Howard Flats Road, Chelan, WA. Attached is the initial sampling data dated 1-7-2020 for the soil material imported from Chelan Sand & Gravel from their 879 Howard Flats Road site confirming the imported soil used for soft capped areas has concentrations of contamination below 20 mg/Kg for arsenic and 250 mg/Kg for lead.

Additional soil sampling of the 12-inch thick soil capping performed on the remaining area that was capped this last summer for the area highlighted in green on the attached **Figure B** – **C1.3 Site Plan**. **Figure B** also shows the locations of the six (6) soil samples taken to confirm the imported soil is not contaminated with lead and arsenic. This final sampling data for that soft capped area shows concentrations of contamination are below 20 mg/Kg for arsenic and 250 mg/Kg for lead.

- 3. Please clarify which parcels you are asking me to write an opinion for either one, or both. <u>Response:</u> We are requesting an opinion for No Further Action (NFA) for only Parcel No. 27231867013 (parcel address: 110 S. Apple Blossum Road).
- 4. All laboratory data sheets from the laboratory, including any quality assurance and chain of custody documentation.

Any data that has not yet been entered into EIM must also be added to EIM. Since our EIM personnel are backed up, if you can provide a confirmatory email that you have submitted additional EIM data, that will be acceptable.

Response: Attached is the lab data sheets for the recent six (6) soil test samples taken from the remainder of the site area highlighted in green that was required to be capped as shown in attached **Figure C – Site Plan**. The laboratory data sheets also include the Chain of Custody and quality assurance documentation. The test data for these six (6) samples has been entered into Ecology's EIM database (see attached confirmation email from ECY – Nicole Masurat on 12-19-2023).

 A Terrestrial Ecological Evaluation (TEE) must be conducted and approved by Ecology. Please see this link for guidance: Terrestrial ecological evaluation - Washington State Department of Ecology

<u>Response:</u> A simplified Terrestrial Ecological Evaluation (TEE) was submitted previously to ECY- Mary Monahan by email on August 11, 2022. This TEE form has been updated and is attached for your review.

Please let us know if you have any questions or additional items that need to be included for Ecology to issue the VCP opinion on this project.

Sincerely,

Dave Schettler, PE
Schettler Civil Engineering Services LLC
(for Construction Special Inspections)

phone: (509) 669-5469

email: <u>davidjschettler@msn.com</u>



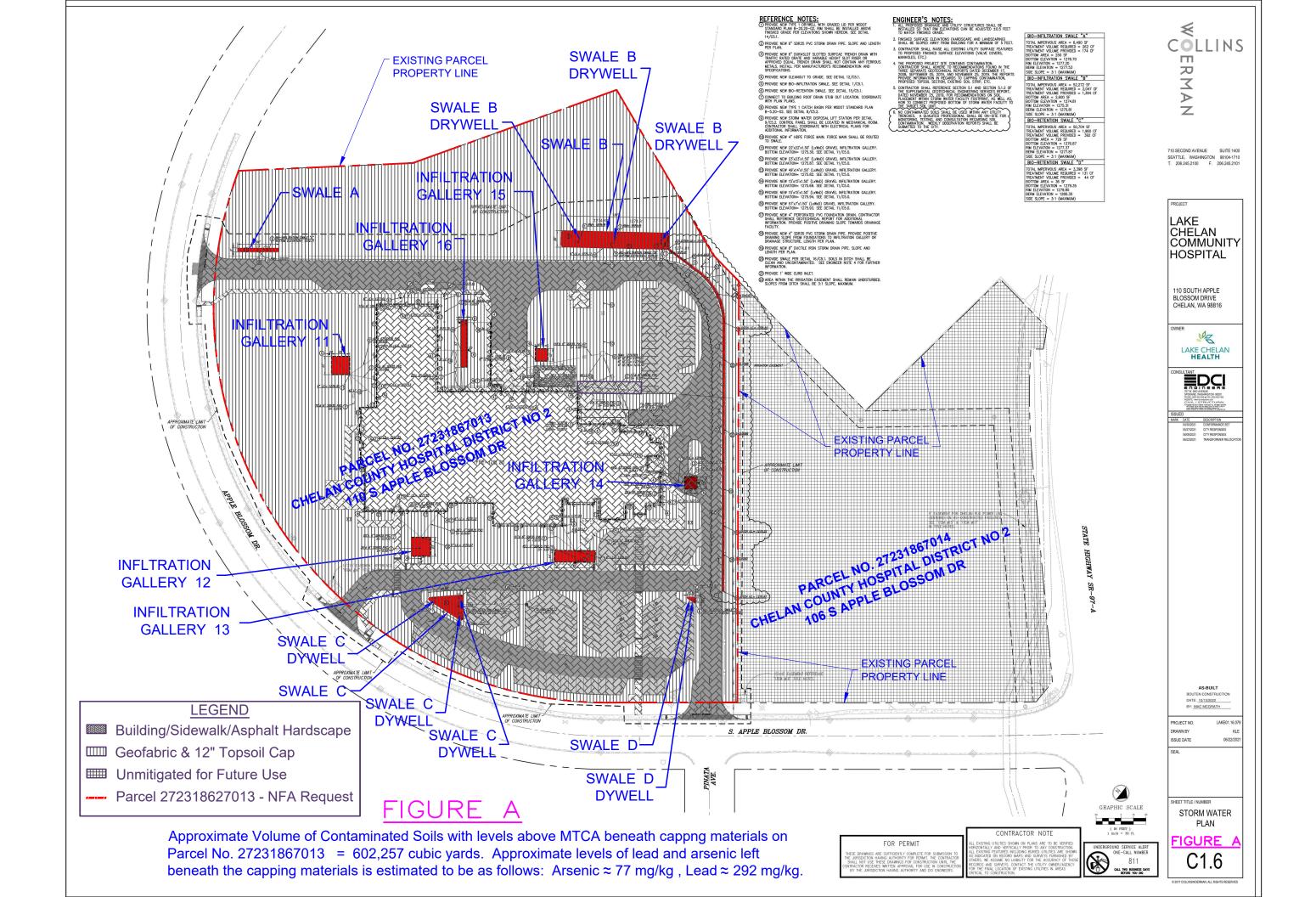
Dick Bratton - Project Management LLC

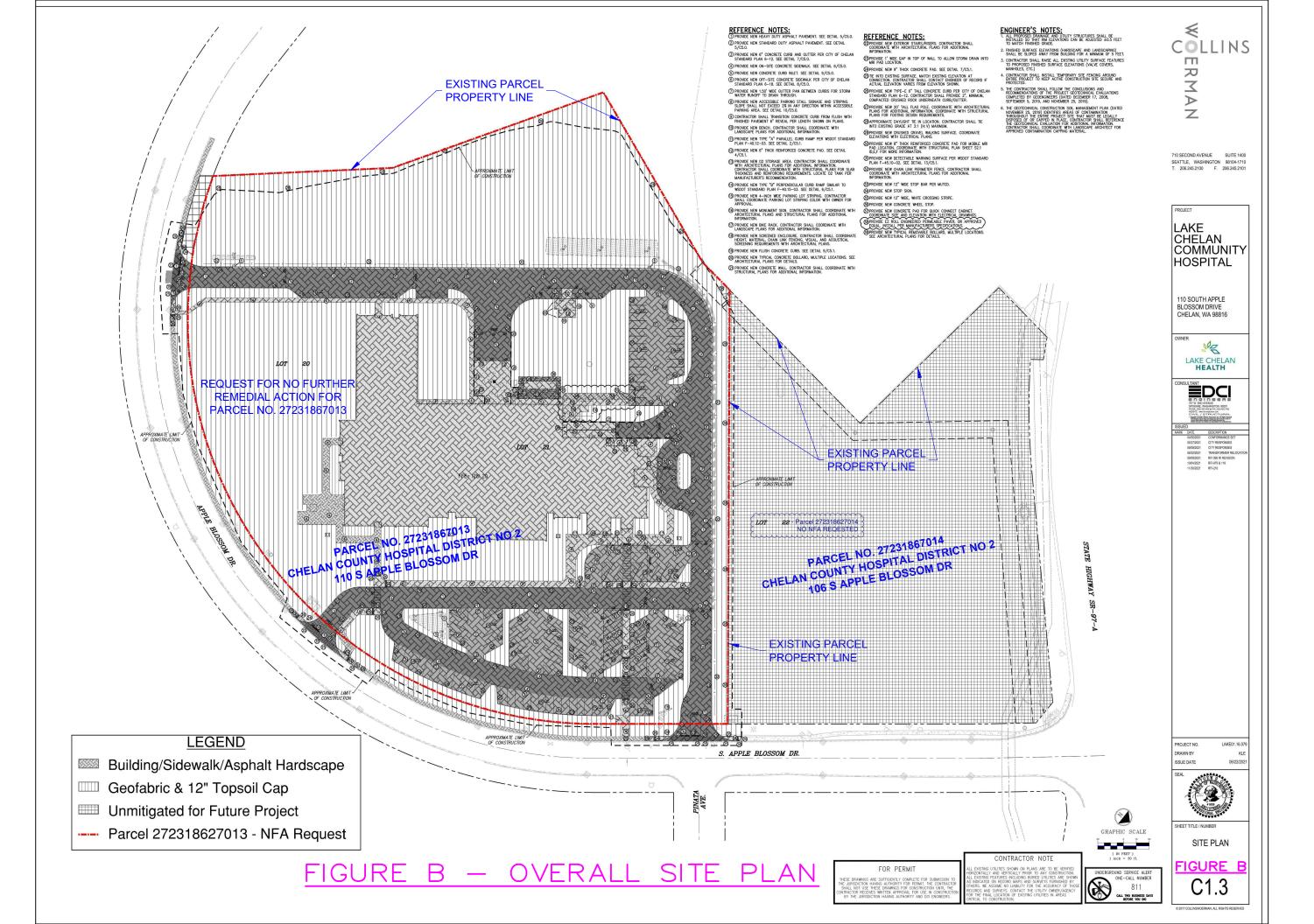
Mac McGrath – Bouten Construction Company Derek Nyland – Construction Special Inspections

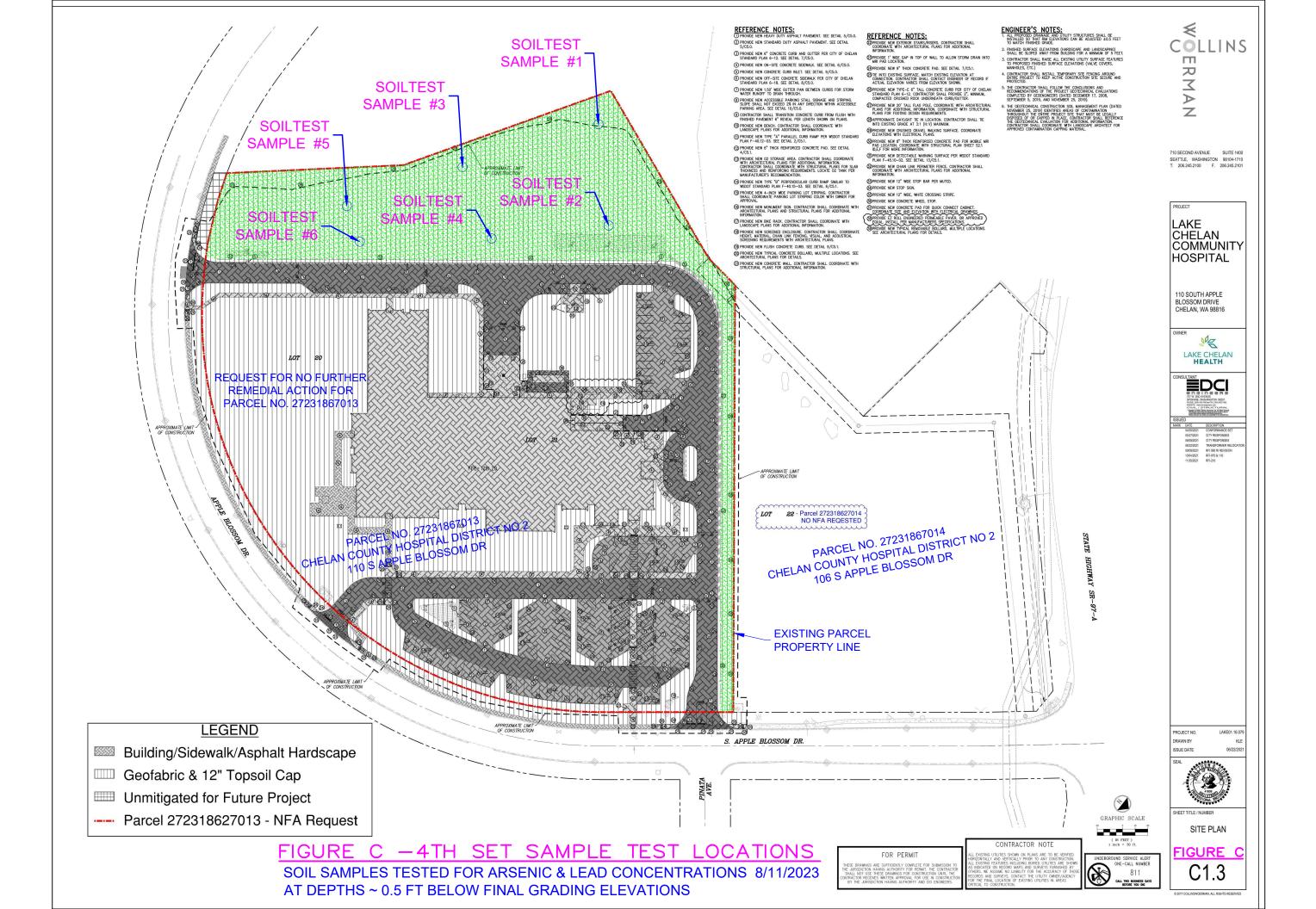


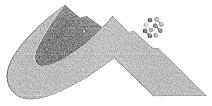
Attachments:

- Initial Soils Sampling Lab Data for Imported Soil from Chelan Sand & Gravel's Howard Flats Rd Site.
- Additional Soil Sampling Lab Data (by Soiltest Labs) for West Capped Area (highlighted in green in Figure C).
- Updated simplified Terrestrial Ecological Evaluation (TEE) form dated Nov. 28, 2023.









CASCADE ANALYTICAL A EUROFINS COMPANY 1-800-545-4206

(509) 662-1888 Fax: (509) 662-8183 3019 G. S. Center Road Wenatchee, WA 98801

Batch: 003172

(509) 452-7707 Grower:

Fax: (509) 452-7773

Fax: (509) 452-7773 Account: 21100 1008 W. Ahtanum Rd. Sampler: Chelan Sand & Gravel, LLC Union Gap, WA 98903 PD Number:

SOIL ANALYSIS RESULTS

Report Date: 1/13/20

Date Received: 1/ 7/20 Date Sampled:

1/ 7/20

Chelan Sand & Gravel, LLC 879 Howard Flats Rd. Chelan, WA 98816

Lab Number: 20-S000445

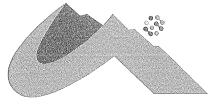
Sample Id: Front of pile

Test Requested	Results	Relative Level	Optimum Range
Arsenic Solid	5.310 mg/K	9	SW846 6010
Lead Solid	< 5 mg/Kg		SW846 6010

Test every other year. files./ Please keep results in your reference

Approved By

23 Page:



CASCADE ANALYTICAL A EUROFINS COMPANY 1-800-545-4206

(509) 662-1888 Fax: (509) 662-8183 3019 G. S. Center Road Wenatchee, WA 98801

Batch: 003172

(509) 452-7707 Grower:

Fax: (509) 452-7773 1008 W. Ahtanum Rd. Union Gap, WA 98903 Sampler: Chelan Sand & Gravel, LLC

PO Number:

ECIL ANALYSIS RESULTS

Report Date: 1/13/20

Date Received: 1/ 7/20 Date Sampled: 1/ 7/20

Chelan Sand & Gravel, LLC 879 Howard Flats Rd.

Chelan, WA 98816

Lab Number: 20-5000446

Sample Id: Back of pile

Test Requested	Results	Relative Level	Optimum Range
Arsenic Solid	< 5 mg/Kg		SW846 6010
Lead Solid	< 5 mg/Kg		SW846 6010

Please keep results in your reference fles. /fest every other year.

Approved By



Sample Receipt Form

Date Received: 1/7/20 Time Received: \$:5/6m	Initials:7200
Client Name: Chelan Sand & Gravel Project Nan Temperature of cooler upon receipt: 16 °C Thermom	me: Ag soil
Temperature of cooler upon receipt:^/C Thermom	neter ID: #4
Custody seals: Intact Broken None N/A	
Chain of Custody Completed: Client name, address, and phone number; Date and time of sampling; Test requests clear; Completed in ink; Signed by client;	Yes No Yes No Yes No Yes No Yes No
All samples received:	Yes No
All samples intact:	(Yes) No
Sample ID's match COC form:	(Yes) No
Appropriate containers used:	Yes No
Sufficient amount of sample for analysis:	Yes No
Correct preservative verified:	Yes No
Air bubbles in VOC, TTHM, or HAA5 samples:	Yes No
Sample(s) exceed hold time:	Yes
Type of coolant: Ice Blue Ice None Other Comm	ment:
Shipping Method: FedEx UPS USPS Brett & Sons	Hand Delivered CAI Sampled
Shipping Container: E-CA Cooler E-CA Cooler Box Client's	Cooler None Other
Samples accepted for analysis:	(Yes) No
Reason for Rejection:	
Name of Person Contacted: Da	ate Contacted:
Comments:	

CASCADE ANALYTICAL, INC.

GROWER'S NAME/ADDRESS

SAMPLE INFORMATION

TEST REQUEST

1 E WASH I

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Sample 3
Sample 4
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CASCADE ANALYTICAL, INC.

GROWER'S NAME/ADDRESS

SAMPLE INFORMATION

TEST REQUEST

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(509) 662-1888 Sent & Gruvel, SAMPLER'S Fax: (509) 662-8183 NAME 3019 G.S. Center Rd. Fully complete shaded areas only Wenatchee, WA 98801 SEND RESULTS GEOGRAPHIC DATE TO: G. GROWER ZONE (SEE REVERSE (509) 452-7707 OF SAMPLING A: BILLING SIDE) Fax: (509) 452-7773 ADDRESS B: BOTH D D 1008 W. Ahtanum Rd. Union Gap, WA 98903 BILLING NAME/ADDRESS Disputche yabou com PHONE NO. 350 9542 O PREDOMINANT SOIL TYPE M PRUNING L GROP LOAD SOIL DEPTH LAB REQUEST TYPE 1=EWI, 2=EWII 3=EWIII, 4=WWI CROPAVARIETY VIGOR N=non-producing L=light A=average H=heavy 1=0 2=1-6" N=none L=light M=medium H=heavy (Enter selection from reverse side) 1=0-6" 1=0-6 2=6-12" 3=6-18" 4=12-24" 5=24-36" TREE AGE 1=sand 3=7-18" 4=19-35" 5=36+ 2=sandy loam 3=silt loam 4=clay 5=complete 6=garden 9=your selection (Years) PhAS % OM S0. Cu Mn Gyp.Req. CEC Exchangeable
CA Mg Na Texture В N0₃N As Ca Mg Off. 20 V A S 1 W. 6/ V Of 0/ 0/ V V 6/ M V 0/ 26 0/





CSI NW Derek Nyland DATE REC 7-Aug-23

Amount due \$ 252.00

LAB # S23-15102 Date Reported: 08/11/22

Reveiwed by: Brent Thyssen, CPSSc

LAKE CHELAN HOSPITAL

Heavy Metals

WAC 173-340-900

1	Method	Dry Wt.	Units	MDL	MTCA Method A
Arsenic	EPA 3050B/ 6010D	2.00	mg/kg	1.05	20 ppm
Lead	EPA 3050B/ 6010D	4.94	mg/kg	0.87	250 ppm
S23-15102					

Heavy Metals

WAC 173-340-900

2	Method	Dry Wt.	Units	MDL	MTCA Method A
Arsenic	EPA 3050B/ 6010D	3.79	mg/kg	1.05	20 ppm
Lead	EPA 3050B/ 6010D	2.87	mg/kg	0.87	250 ppm
S23-15103				•	

Heavy Metals

WAC 173-340-900

		-			
3	Method	Dry Wt.	Units	MDL	MTCA Method A
Arsenic	EPA 3050B/ 6010D	4.79	mg/kg	1.05	20 ppm
Lead	EPA 3050B/ 6010D	2.29	mg/kg	0.87	250 ppm
S23-15104					

Heavy Metals

WAC 173-340-900

4	Method	Dry Wt.	Units	MDL	MTCA Method A
Arsenic	EPA 3050B/ 6010D	2.47	mg/kg	1.05	20 ppm
Lead	EPA 3050B/ 6010D	3.16	mg/kg	0.87	250 ppm
S23-15105					

Heavy Metals

WAC 173-340-900

5	Method	Dry Wt.	Units	MDL	MTCA Method A
Arsenic	EPA 3050B/ 6010D	1.93	mg/kg	1.05	20 ppm
Lead	EPA 3050B/ 6010D	0.81	mg/kg	0.87	250 ppm
S23-15106					

Heavy Metals

WAC 173-340-900

6	Method	Dry Wt.	Units	MDL	MTCA Method A
Arsenic	EPA 3050B/ 6010D	2.72	mg/kg	1.05	20 ppm
Lead	EPA 3050B/ 6010D	2.13	mg/kg	0.87	250 ppm
S23-15107					



Laboratory Chain of Custody

Client: Please fill out:		Copy of repor	of report sent to:		Job #/ Name	Lake Chelan Hospital	lospital			
Company: CSI NW		Company:			Payment Method: Credit Card	od: Credit Ca	rd Est. Acct.	Acct.		
Contact: Derek Nyland		Contact:								
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Submission of samples to Leboratory with a Chain of Custody constitutes a contract for services requested. Provide paymen ocean war send inherent sample variability in compost, soils and plants, our habitity is effort to provide an accurate analysis of this sample, For reasonable cause, we will repeat the tests, but because of factors beyond our control, in sampling procedures and inherent sample variability in compost, soils and plants, our habitity is limited to the price of the tests.

WASHINGTON STATE DEPARTMENT OF ECOLOGY

ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

SCOPE OF ACCREDITATION

Soiltest Farm Consultants, Inc. Laboratory

Moses Lake, WA

is accredited for the analytes listed below using the methods indicated. Full accreditation is granted unless stated otherwise in a note. EPA is the U.S. Environmental Protection Agency. SM is "Standard Methods for the Examination of Water and Wastewater." SM refers to EPA approved method versions. ASTM is the American Society for Testing and Materials. USGS is the U.S. Geological Survey. AOAC is the Association of Official Analytical Chemists. Other references are described in notes.

Matrix/Analyte	Method	Notes
Drinking Water		
Turbidity	SM 2130 B-2011	
Fluoride	SM 4500-F C-2011	
Nitrate as N	SM 4500-NO3 F-2011	
Nitrite as N	SM 4500-NO3 F-2011	
Non-Potable Water		
n-Hexane Extractable Material (O&G)	EPA 1664A_1_1999	
Turbidity	SM 2130 B-2011	
Alkalinity	SM 2320 B-2011	
Hardness (calc.)	SM 2340 B-2011	
Specific Conductance	SM 2510 B-2011	
Solids, Total	SM 2540 B-2011	
Solids, Total Dissolved	SM 2540 C-2011	
Solids, Total Suspended	SM 2540 D-2011	
Chloride	SM 4500-CI E-2011	
Fluoride	SM 4500-F C-2011	
Ammonia	SM 4500-NH3 H-2011	
Nitrate as N	SM 4500-NO3 F-2011	
Nitrite as N	SM 4500-NO3 F-2011	
Nitrogen, Total Kjeldahl	SM 4500-Norg D-2011	
Orthophosphate as P	SM 4500-P E-2011	1
Phosphorus, Total	SM 4500-P E-2011	1
Sulfate	SM 4500-SO4 E-2011	
Biochemical Oxygen Demand (BOD), Carbonaceous BOD (CBOD)	SM 5210 B-2011	1
Chemical Oxygen Demand (COD)	SM 5220 D-2011	
Aluminum	EPA 200.5_4.2_2003	
Antimony	EPA 200.5_4.2_2003	

Washington State Department of Ecology

Effective Date: 9/8/2022

Scope of Accreditation Report for Soiltest Farm Consultants, Inc. Laboratory

C605-22

Laboratory Accreditation Unit

Page 1 of 3

Scope Expires: 9/7/2023

Soiltest Farm Consultants, Inc. Laboratory

Matrix/Analyte	Method	Notes
Non-Potable Water		
Arsenic	EPA 200.5_4.2_2003	
Barium	EPA 200.5_4.2_2003	
Beryllium	EPA 200.5_4.2_2003	
Cadmium	EPA 200.5_4.2_2003	
Chromium	EPA 200.5_4.2_2003	
Cobalt	EPA 200.5_4.2_2003	
Copper	EPA 200.5_4.2_2003	
ron	EPA 200.5_4.2_2003	
Lead	EPA 200.5_4.2_2003	
Lithium	EPA 200.5_4.2_2003	1
Manganese	EPA 200.5_4.2_2003	
Molybdenum	EPA 200.5_4.2_2003	
Nickel	EPA 200.5_4.2_2003	
Selenium	EPA 200.5_4.2_2003	
Silver	EPA 200.5_4.2_2003	
Strontium	EPA 200.5_4.2_2003	
Vanadium	EPA 200.5_4.2_2003	
Zinc	EPA 200.5_4.2_2003	
Calcium	EPA 200.7_4.4_1994	
Magnesium	EPA 200.7_4.4_1994	
Phosphorus	EPA 200.7_4.4_1994	1
Potassium	EPA 200.7_4.4_1994	
Sodium	EPA 200.7_4.4_1994	
Solid and Chemical Materials		
Total carbon	AOAC 972.43	1
Nitrogen, Total	AOAC 990.3	1
Nitrogen, Total Kjeldahl	AOAC 990.3	1
Solids, Total, Fixed and Volatile	SM 2540 G-2011	
Ammonia	SM 4500-NH3 H-2011	1
Nitrate as N	SM 4500-NO3 F-2011	1,2
Aluminum	EPA 6010D_(7/14)	
Antimony	EPA 6010D_(7/14)	
Arsenic	EPA 6010D_(7/14)	
Barium	EPA 6010D_(7/14)	
Beryllium	EPA 6010D_(7/14)	
Cadmium	EPA 6010D_(7/14)	
Calcium	EPA 6010D_(7/14)	

Washington State Department of Ecology

Effective Date: 9/8/2022

Scope of Accreditation Report for Soiltest Farm Consultants, Inc. Laboratory

C605-22

Laboratory Accreditation Unit

Page 2 of 3

Scope Expires: 9/7/2023

Matrix/Analyte	Method	Notes	
Solid and Chemical Materials			
Chromium	EPA 6010D_(7/14)		
Cobalt	EPA 6010D_(7/14)		
Copper	EPA 6010D_(7/14)		
Iron	EPA 6010D_(7/14)		
Lead	EPA 6010D_(7/14)		
Magnesium	EPA 6010D_(7/14)		
Manganese	EPA 6010D_(7/14)		
Molybdenum	EPA 6010D_(7/14)		
Nickel	EPA 6010D_(7/14)		
Phosphorus, total	EPA 6010D_(7/14)		
Potassium	EPA 6010D_(7/14)		
Selenium	EPA 6010D_(7/14)		
Sodium	EPA 6010D_(7/14)		
Strontium	EPA 6010D_(7/14)		
Vanadium	EPA 6010D_(7/14)		
Zinc	EPA 6010D_(7/14)		
Mercury	EPA 7473_(2/07)		

Accredited Parameter Note Detail

(1) Interim accreditation pending the successful completion of an on-site audit to verify method capabilities (WAC 173-50-100). (2) Reported result is technically nitrate-nitrite, however nitrite values are negligible due to oxidizing conditions.

Ween Con	09/12/2022		
Authentication Signature	Date		
Rebecca Wood, Lab Accreditation Unit Supervisor			

From: Masurat, Nicole (ECY) <nmas461@ECY.WA.GOV>

Sent: Tuesday, December 19, 2023 9:14 AM

To: Angelica <support@csinw.com>

Subject: RE: Verification/Submitted Test Results and Locations

Hi Angelica,

The table below shows the location and result submissions for the VCCE0509 study that are awaiting review and loading to EIM. When the files are reviewed a data coordinator will reach out to Derek Nyland with edit requests.

	Created By Full			Total		
Batch Type	Name	Created Date	Batch Filename	Records	Program Office	Organization
LOCATION	Derek Nyland	11/27/2023 12:03	SW Cap Locations 11-27-2023 (1).csv	6	TCP-Cleanup	CSI: Construction Special Inspection - Wenatchee
LOCATION	Derek Nyland	11/27/2023 11:39	VCCE0509_Locations_Template_11-27-2023.csv	37	TCP-Cleanup	CSI: Construction Special Inspection - Wenatchee
RESULT	Derek Nyland	11/27/2023 12:04	SW Cap Results 11-27-2023 (1).csv	12	TCP-Cleanup	CSI: Construction Special Inspection - Wenatchee

Please let me know if I can help with anything else.

Thank you, Nicole

Nicole Masurat

EIM Data Coordinator

Washington State Department of Ecology

From: Angelica <<u>support@csinw.com</u>>
Sent: Tuesday, December 19, 2023 8:50 AM
To: Masurat, Nicole (ECY) <<u>nmas461@ECY.WA.GOV</u>>
Subject: RE: Verification/Submitted Test Results and Locations

Yes, Lake Chelan Hospital with Study ID VCCE0509

From: Masurat, Nicole (ECY) < nmas461@ECY.WA.GOV > Sent: Monday, December 18, 2023 11:26 AM

To: Angelica < support@csinw.com >

Subject: RE: Verification/Submitted Test Results and Locations

Hi Angelica,

Can you provide a little more information on the submissions so I can find them in our database? Is this data for the Lake Chelan Hospital study with a Study ID of VCCE0509 and a Facility Site ID of 66314?

Nicole Masurat

EIM Data Coordinator

Washington State Department of Ecology

From: Angelica <<u>support@csinw.com</u>>
Sent: Monday, December 18, 2023 10:56 AM
To: Masurat, Nicole (ECY) <<u>nmas461@ECY.WA.GOV</u>>
Subject: Verification/Submitted Test Results and Locations

Hi Nicole, can we please get verification that our latest Data (Test results and locations) for the Lake Chelan Hospital Site were uploaded in the EIM database? Thank you!

-Angelica

Dept of Ecology is requesting the following be provided so as to understand that you have uploaded the last 6 sample data results into the EIM database:

Any data that has not yet been entered into EIM must also be added to EIM. Since our EIM personnel are backed up, if you can provide an confirmatory email that you have submitted additional EIM data, that will be acceptable.

So, please copy me any email that you had last received on confirming the EIM database information for these samples was entered into ECY's database. Thanks.

Dave Schettler (509) 669-5469



Voluntary Cleanup Program

Washington State Department of Ecology Toxics Cleanup Program

TERRESTRIAL ECOLOGICAL EVALUATION FORM

Under the Model Toxics Control Act (MTCA), a terrestrial ecological evaluation is necessary if hazardous substances are released into the soils at a Site. In the event of such a release, you must take one of the following three actions as part of your investigation and cleanup of the Site:

- Document an exclusion from further evaluation using the criteria in WAC 173-340-7491.
- 2. Conduct a simplified evaluation as set forth in WAC 173-340-7492.
- 3. Conduct a site-specific evaluation as set forth in WAC 173-340-7493.

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation.

Completion of this form is not sufficient to document your evaluation. You still need to document your analysis and the basis for your conclusion in your cleanup plan or report.

If you have questions about how to conduct a terrestrial ecological evaluation, please contact the Ecology site manager assigned to your Site. For additional guidance, please refer to https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Terrestrial-ecological-evaluation.

Step 1: IDENTIFY HAZARDOUS WASTE SITE				
Please identify below the hazardous waste site for which you are documenting an evaluation.				
Facility/Site Name: LCH/LCCHRH (K711) - Contaminated Soils Testing at Stormwater Features				
Facility/Site Address: 106 and 110 South Apple Blossom Drive, Chelan, WA 98816				
Facility/Site No: 66314	VCP Project No.: CE0509			

Step 2: IDENTIFY EVALUATOR					
	Please identify below the person who conducted the evaluation and their contact information.				
Name: David Schettler, P.E	- Hunt thisly	loven	nber 28, 2023	Title: Civil Engineer	
Organization: Construction	Organization: Construction Special Inspections				
Mailing address: 57 Wedge View Lane					
City: Leavenworth		State: WA		Zip code: 98826	
Phone: (509) 669-5469	Fax:		E-mail: david	ljschettler@msn.com	

Step 3: DOCUMENT EVALUATION TYPE AND RESULTS

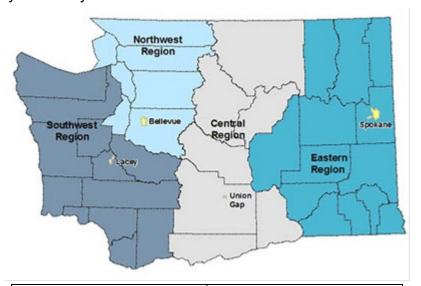
A.	Exclu	ision f	from	further evaluation.
1.	I. Does the Site qu			ualify for an exclusion from further evaluation?
	[⊠ Ye	es	If you answered "YES," then answer Question 2.
	[☐ No Unkno	o or own	If you answered "NO" or "UNKNOWN," then skip to Step 3B of this form.
2.	What	is the	bas	is for the exclusion? Check all that apply. Then skip to Step 4 of this form.
	Point o	of Cor	nplia	ince: WAC 173-340-7491(1)(a)
	[All s	oil contamination is, or will be,* at least 15 feet below the surface.
	ĺ	\boxtimes	dep	oil contamination is, or will be,* at least 6 feet below the surface (or alternative th if approved by Ecology), and institutional controls are used to manage aining contamination.
	Barrie	rs to E	Expo	sure: WAC 173-340-7491(1)(b)
	[\boxtimes	pav	contaminated soil, is or will be,* covered by physical barriers (such as buildings or ed roads) that prevent exposure to plants and wildlife, and institutional controls used to manage remaining contamination.
	Undev	/elope	ed La	nd: WAC 173-340-7491(1)(c)
	Ī	\boxtimes	of a diox end	re is less than 0.25 acres of contiguous [#] undeveloped [±] land on or within 500 feet ny area of the Site and any of the following chemicals is present: chlorinated ins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, osulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, uphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.
	[sites not containing any of the chemicals mentioned above, there is less than 1.5 es of contiguous [#] undeveloped [±] land on or within 500 feet of any area of the Site.
	Backg	round	l Cor	ncentrations: WAC 173-340-7491(1)(d)
	[centrations of hazardous substances in soil do not exceed natural background levels escribed in WAC 173-340-200 and 173-340-709.
	An exclu ceptable			on future land use must have a completion date for future development that is
pre # " hig	vent wi Contigu	ildlife fr ıous" u extens	om fendev	is land that is not covered by building, roads, paved areas, or other barriers that would be be be be be be be building, roads, paved areas, or other barriers that would be be be be be be be building on plants, earthworms, insects, or other food in or on the soil. Be be be be be be belong that is not divided into smaller areas of aving, or similar structures that are likely to reduce the potential use of the overall area.

В.	Simplified	evaluation.					
1.	Does the S	oes the Site qualify for a simplified evaluation?					
	□ Y	es If you answered "YES," then answer Question 2 below.					
	⊠ N Unkn	it voll answered "NO" or "LINK NOVVN " then skin to Step 30, of this form					
2.	Did you co	nduct a simplified evaluation?					
	□ Y	es If you answered "YES," then answer Question 3 below.					
	⊠N	o If you answered "NO," then skip to Step 3C of this form.					
3.	Was further	r evaluation necessary?					
	⊠ Y	es If you answered "YES," then answer Question 4 below.					
	□ N	o If you answered "NO," then answer Question 5 below.					
4.	If further e	valuation was necessary, what did you do?					
		Used the concentrations listed in Table 749-2 as cleanup levels. <i>If so, then skip to</i> Step 4 of this form.					
		Conducted a site-specific evaluation. If so, then skip to Step 3C of this form.					
5.	If no furthe	er evaluation was necessary, what was the reason? Check all that apply. Then skip this form.					
	Exposure Analysis: WAC 173-340-7492(2)(a)						
		Area of soil contamination at the Site is not more than 350 square feet.					
		Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.					
	Pathway A	nalysis: WAC 173-340-7492(2)(b)					
	\boxtimes	No potential exposure pathways from soil contamination to ecological receptors.					
	Contamina	nt Analysis: WAC 173-340-7492(2)(c)					
		No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.					
		No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations that exceed the values listed in Table 749-2, and institutional controls are used to manage remaining contamination.					
	\boxtimes	No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays.					
		No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, and institutional controls are used to manage remaining contamination.					

C.	the problem	ic evaluation. A site-specific evaluation process consists of two parts: (1) formulating in, and (2) selecting the methods for addressing the identified problem. Both steps sultation with and approval by Ecology. See WAC 173-340-7493(1)(c).
1.	Was there	a problem? See WAC 173-340-7493(2).
	⊠ Ye	es If you answered "YES," then answer Question 2 below.
	□ N	If you answered "NO," then identify the reason here and then skip to Question 5 below:
		No issues were identified during the problem formulation step.
		While issues were identified, those issues were addressed by the cleanup actions for protecting human health.
2.	What did y	ou do to resolve the problem? See WAC 173-340-7493(3).
		Used the concentrations listed in Table 749-3 as cleanup levels. <i>If so, then skip to</i> Question 5 below.
	\boxtimes	Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate and address the identified problem. <i>If so, then answer Questions 3 and 4 below.</i>
3.	_	lucted further site-specific evaluations, what methods did you use? at apply. See WAC 173-340-7493(3).
		Literature surveys.
		Soil bioassays.
		Wildlife exposure model.
		Biomarkers.
		Site-specific field studies.
		Weight of evidence.
		Other methods approved by Ecology. If so, please specify: The Toxicity Characteristic Leaching Procedure (TCLP) methodology was used to determine if lead and arsenic leachate concentrations would be above the TCLP limits (defined by the EPA) at levels 15 feet deep and shallower, and if these limits were not exceeded, then the likelihood of existing groundwater at depths of 70 to 105 feet deep (at wells 2 and 3) becoming contaminated are acceptably minimized to be highly unlikely. Note that the TCLP limits are lower than the limits defined in both Tables 749-2 and 749-3.
4.	What was t	he result of those evaluations?
		Confirmed there was no problem.
		Confirmed there was a problem and established site-specific cleanup levels.
5.		already obtained Ecology's approval of both your problem formulation and esolution steps?
	⊠ Yo	If so, please identify the Ecology staff who approved those steps: Jeff Newschwander and Mary Monahan
	□ N	0

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



Northwest Region:

Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452

Southwest Region:

Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775

Central Region:

Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009

Eastern Region:

Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call 877-833-6341.