



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Central Region Office

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

March 7, 2024

Darin Arrasmith  
City of Richland  
PO Box 190 MS 19  
Richland, WA 99352

**Re: No Further Action opinion for the following Contaminated Site:**

- **Site Name:** Richland City Shops
- **Site Address:** 915 Goethals Drive, Richland
- **Facility/Site ID:** 49213668
- **Cleanup Site ID:** 6169
- **VCP Project No.:** CE0530

Dear Darin Arrasmith:

The Washington State Department of Ecology (Ecology) received your request on October 21, 2021 for an opinion regarding the sufficiency of your independent cleanup of the Richland City Shops facility (Site) under the Voluntary Cleanup Program (VCP).<sup>1</sup> This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.<sup>2</sup>

## Opinion

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Ecology has determined that **no** further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC<sup>3</sup> (collectively called "MTCA").

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<sup>1</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

<sup>2</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

## Site Description

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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 release(s):

- Gasoline in groundwater.
- Diesel in soil.
- Benzene in soil and groundwater.
- Tetrachloroethylene (PCE) and trichloroethylene (TCE) in groundwater.
- Pesticides in soil.

Site description, history, and diagrams can be found in the documents below, especially “Soil and Groundwater Sampling and Feasibility Study Former City Shops Site” by Shannon & Wilson, dated March 7, 2016.<sup>4</sup>

Please note that releases from multiple sites can affect a parcel of real property. At this time, Ecology has no information that other sites affect the parcel(s) associated with this Site.

## Basis for the Opinion

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Ecology bases this opinion on information in the documents below. You can request these documents by filing a records request.<sup>5</sup> For help making a request, contact the Public Records Officer at [recordsofficer@ecy.wa.gov](mailto:recordsofficer@ecy.wa.gov) or call (360) 407-6040. Before making a request, check if the documents are available on the Richland City Shops site page.<sup>6</sup>

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

- Shannon & Wilson, “Groundwater Monitoring Results – 2020 Former City Shops Site” dated January 25, 2021<sup>7</sup>
- Shannon & Wilson, “Groundwater Monitoring Report April and October 2017 Former City Shops” dated January 23, 2018<sup>8</sup>
- Shannon & Wilson, “Groundwater Monitoring Report October 2016 Former City Shops” dated January 30, 2017<sup>9</sup>
- Shannon & Wilson, “Soil and Groundwater Sampling and Feasibility Study Former City Shops Site” dated March 7, 2016

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<sup>4</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/113656>

<sup>5</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

<sup>6</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/6169#site-documents>

<sup>7</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/106327>

<sup>8</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/113658>

<sup>9</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/113657>

- Shannon & Wilson, “Groundwater Monitoring Results September 2013 Sampling Event Former City Shops Site” dated November 22, 2013<sup>10</sup>
- Shannon & Wilson, “Groundwater Monitoring Results March 2013 Sampling Event Former Richland City Shops Site” dated April 18, 2013<sup>11</sup>
- Shannon & Wilson, “Groundwater Monitoring Results Fromer City Shop Site” dated June 30, 2011<sup>12</sup>
- K. Kaser Co, Inc., “Environmental Site Cleanup” dated May 1, 2002<sup>13</sup>
- IT Corporation, “Phase 1 Environmental Site Assessment” dated January 2000<sup>14</sup>
- IT Corporation, “Review of the City of Richland’s Independent Remedial Action” dated February 2000<sup>15</sup>
- City of Richland Civil and Environmental Engineering, “UST Site Closure Reports, Sites #9090 & #9093” dated December 17, 1998<sup>16</sup>

## **Analysis of the Cleanup**

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Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

### **Characterizing the Site**

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action.

A Site assessment performed in 1992 identified petroleum contaminated soils and groundwater. Additional investigation in 1993 delineated areas of concern and developed the list of Site contaminants. Groundwater data indicated flow direction toward the northeast with contamination remaining onsite. These investigations revealed the need to remove the underground storage tanks (UST) and the need for further Site investigation. Soil removal in 1998 and 1999 sufficiently identified the contaminants of concern and extent of the soil and groundwater contamination.

### **Setting cleanup standards**

Ecology has determined the cleanup levels and points of compliance you set for the Site meet the substantive requirements of MTCA.

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<sup>10</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/113655>

<sup>11</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/19783>

<sup>12</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/8838>

<sup>13</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/8839>

<sup>14</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/113654>

<sup>15</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/106391>

<sup>16</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/8840>

Site investigations identified contamination in soil and groundwater. Cleanup standards were established for both the soil and groundwater exposure pathways.

Site contaminants include known volatile organic compounds (VOCs). VOCs are chemicals that are likely to evaporate under normal subsurface conditions which may cause indoor air contamination through vapor intrusion (VI). Indoor air cleanup standards were not established due to the location and concentrations of VOCs remaining in Site soils and groundwater.

MTCA Method A cleanup levels with standard points of compliance based on drinking water beneficial uses are appropriate for Site groundwater.

The following MTCA Method A cleanup levels for both soil and groundwater are for unrestricted land uses:

Hazardous Substance	MTCA Method A Soil Cleanup Level (mg/kg)	MTCA Method A Groundwater Cleanup Level (µg/L)
Gasoline	30 (benzene present)	800 (benzene present)
Diesel	200	500
Benzene	0.03	5
Toluene	7	1,000
Ethylbenzene	6	700
Xylenes	9	1,000
MTBE	0.1	20
Tetrachloroethylene	0.05	5
Trichloroethylene	0.03	5

Ecology has determined that the cleanup standards at the Site meet the substantive requirements of MTCA.

### Selecting the cleanup action

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Ecology has determined the cleanup action you selected- soil excavation and disposal coupled with monitoring natural attenuation- meets the substantive requirements of MTCA.

Cleanup action consisted of a series of interim actions between 1992 and 1999. Contaminated soil, between the ground surface and top of groundwater, was excavated and appropriately disposed of during these interim actions. A shallow soil excavation, targeting pesticides, occurred in 2002.

The old maintenance facility was demolished in 1999 and a new structure was built between 2002 and 2011. Due to the location of remaining soil contamination, vapor intrusion (VI) was not investigated. Groundwater samples from 2011 and 2020 indicate VOCs are no longer present in groundwater. The distance of contamination to structures on the Site and the non-detection of contamination in groundwater in both 2018 and 2020 demonstrates that vapor intrusion is an incomplete pathway.

## **Implementing the cleanup action**

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Ecology has determined your cleanup meets the standards set for the Site.

By October of 2018 the contaminants of concern tested below cleanup levels in all wells. Groundwater contamination remains below cleanup levels and were not detected in the September 2020 samples (the latest sampling event).

You must decommission resource protection wells<sup>17</sup> installed as part of the remedial action that are not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.<sup>18</sup>

## **Listing of the Site**

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Based on this opinion, Ecology will update the Site status on the Confirmed and Suspected Contaminated Sites List.

## **Limitations of the Opinion**

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### **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.

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<sup>17</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410>

<sup>18</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

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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).<sup>19</sup>

### **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 if the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080<sup>20</sup> and WAC 173-340-545.<sup>21</sup>

### **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(6).<sup>22</sup>

### **Termination of Agreement**

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Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. CE0530.

### **Questions**

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If you have any questions about this opinion or the termination of the Agreement, please contact me at 509-490-5298 or will.strand@ecy.wa.gov.

Sincerely,



Will Strand  
Toxics Cleanup Program  
Central Regional Office

cc: Ryan Mahaffey, Tri-Cities Community Health  
Morgen Donohue, Shannon & Wilson  
Fiscal, VCP Fiscal Analyst  
TCP, Operating Budget Analyst

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<sup>19</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

<sup>20</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>21</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>22</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

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