Initial Investigation Close-Out Router

ERTS #: 693796 Site Name: Grays Harbor PUD Transformer Release at 6 Johnson Rd			
1	Recommended Action: Circle one of the appropriate categories: No Further Action (NFA) List on Confirmed and Suspected Contaminated Sites List (CSCSL) Initial Investigator: Kirsten Wecker		
2	Recommended Action: Circle one of the appropriate categories: NFA (Non-List) NFA (List on CSCSL as NFA; cleanup occurred) List on CSCSL Unit Supervisor/Regional Coordinator: Kirsten Wecker		
3	Final Action: Circle one of the appropriate categories: NFA (Non-List) NFA (List on CSCSL as NFA; cleanup occurred) List on CSCSL Section Manager:		
	LUST ☐ Docs on Y: ☐ NFA Letter Requested ☐ New UNIT Only ☐ New CSID Only ☐ Rescind NF ☐ Send to Nick before Rebecca! Update File ☐ Model Remedy NFA ☐ _____		
Non-Listed NFAs go Directly to the Incident Tracker, and Then the File Room; Others Follow the Process Below			
4	Date Entered into ISIS: 1/10/2025 Cleanup Site ID Number: 17155 Facility/Site ID Number: 100003119 Date Early Notice Letter Sent (*Listed Sites Only, excludes NFA-List*): FS/ISIS Coordinator: Nancy Davis		
5	Incident Tracker:		Date:
6	File Room:	County:Grays Harbor	File Type:

Clear Entire Form

INITIAL INVESTIGATION FIELD REPORT

WASHINGTON STATE DEPARTMENT OF ECOLOGY

☐ **Check this box if you have attached any documents to this form (using the paperclip icon on the left).**

ERTS #(s):	693796
Parcel #(s):	N/A ROW
County:	Grays Harbor
FSID #: 100003119	
CSID #: 17133	
UST #:	

SITE INFORMATION

Site Name (Name over door):	Site Address (including City, State and Zip):	Phone / Email
PUD Transformer Release ROW 6 Johnson Rd	ROW 6 Johnson Rd Aberdeen, WA 98520	
Site Contact, Title, Business: Dale Benner, Grays Harbor PUD Safety and Environmental Director	Site Contact Address (including City, State and Zip): PO Box 480, 2720 Sumner Ave Aberdeen, WA 98520	Phone (360) 532-4220 Email dbenner@ghpud.org
Site Owner, Title, Business:	Site Owner Address (including City, State and Zip):	Phone Email
Site Owner Contact, Title, Business:	Site Owner Contact Address (including City, State and Zip):	Phone Email
Previous Site Owner(s): Alternate Site Name(s):	Additional Info (for any Site Information Item):	

Latitude (Decimal Degrees):	47.06905
Longitude (Decimal Degrees):	-123.77028

INSPECTION INFORMATION Clear Inspection Specific Info

☐ Please check this box if there is relevant inspection information, such as data or photos, in an existing site report for this site.

Inspection Conducted? Yes ☐ No ☒	Date/Time:	Entry Notice: Announced ☐	Unannounced ☐
Photographs taken?	Yes ☐	No ☐	Note: Attach photographs or upload to PIMS
Samples collected?	Yes ☐	No ☐	Note: Attach record with media, location, depth, etc.

RECOMMENDATION

No Further Action (Check appropriate box below):		**LIST on Confirmed and Suspected Contaminated Sites List**: ☒
Release or threatened release does not pose a threat	☐	
No release or threatened release	☐	
Refer to program/agency (Name: _____)	☐	
Independent Cleanup Action Completed (contamination removed)	☐	

COMPLAINT (Brief Summary of ERTS Complaint):

Mineral oil spill from transformer

CURRENT SITE STATUS (Brief Summary of why Site is recommended for Listing or NFA):

Questions remain regarding remedial efforts after attempts to gain the necessary information from Grays Harbor PUD

Investigator: Kirsten Wecker Date Submitted: 2/17/2022

OBSERVATIONS ☐ **Please check this box if you included information on the Supplemental Page at end of report.**

Description (If site visit made, please be sure to include the following: site observations, site features and cover, chronology of events, sources/past practices likely responsible for contamination, presence of water supply wells and other potential exposure pathways, etc.):

An unknown amount of oil was released from a "PCB free" pad-mounted transformer. It is unknown what "PCB free" is defined as and if it was below the MTCA Method A Cleanup Level of 1 mg/Kg.

An unknown amount of soil was removed from a 3' x 1' x 2' deep excavation for disposal at an undisclosed location.

One soil sample was collected from the excavation limits for mineral oil analysis. The sample results indicated levels of mineral oil below the 4,000 mg/Kg MTCA Method A Cleanup Level.

The photos of the remedial efforts appear to show impacts to the pad and soil outside of the excavation area. Field notes state that a solvent was sprayed on the vault and lid to remove oil residue, but not if the solvent was collected or cleaned for disposal or allowed to enter the soil.

I met with Dale Benner of Grays Harbor Public Utility District to request the additional information. None of it was provided nor was any additional contact made on Mr. Benner's behalf.

Given the lack of additional information after request, and the remaining unknown PCB content of the the transformer, and soil disposal information including location, information regarding the solvent used, and the potential additionally impacted soil outside the excavation, I recommend this Site be included on the Confirmed and Suspected Contaminated Site List.

Documents reviewed:

Reset Contaminant Selections

CONTAMINANT GROUP	CONTAMINANT	*SOIL*	*GROUNDWATER*	*SURFACE WATER*	*AIR*	*SEDIMENT*	DESCRIPTION
Non-Halogenated Organics	Phenolic Compounds						Compounds containing phenols (Examples: phenol; 4-methylphenol; 2-methylphenol)
	Non-Halogenated Solvents						Organic solvents, typically volatile or semi-volatile, not containing any halogens. To determine if a product has halogens, search HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB) and look at the Chemical/Physical Properties, and Molecular Formula. If there is not a Cl, I, Br, F in the formula, it's not halogenated. (Examples: acetone, benzene, toluene, xylenes, methyl ethyl ketone, ethyl acetate, methanol, ethanol, isopropranol, formic acid, acetic acid, stoddard solvent, Naptha). *Use this when TEX contaminants are present independently of gasoline.*
	Polynuclear Aromatic Hydrocarbons (PAH)						Hydrocarbons composed of two or more benzene rings.
	Tributyltin						The main active ingredients in biocides used to control a broad spectrum of organisms. Found in antifouling marine paint, antifungal action in textiles and industrial water systems. (Examples: Tributyltin; monobutyltin; dibutyltin)
	Methyl tertiary-butyl ether						MTBE is a volatile oxygen-containing organic compound that was formerly used as a gasoline additive to promote complete combustion and help reduce air pollution.
	Benzene						Benzene
	Other Non-Halogenated Organics						TEX
	Petroleum Diesel						Petroleum Diesel
	Petroleum Gasoline						Petroleum Gasoline
	Petroleum Other	S	S				Oil-range organics
Halogenated Organics (see notes at bottom)	PBDE						Polybrominated di-phenyl ether
	Other Halogenated Organics						Other organic compounds with halogens (chlorine, fluorine, bromine, iodine). search HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB) and look at the Chemical/Physical Properties, and Molecular Formula. If there is a Cl, I, Br, F in the formula, it is halogenated. (Examples: Hexachlorobutadiene; hexachlorobenzene; pentachlorophenol)
	Halogenated solvents						PCE, chloroform, EDB, EDC, MTBE
	Polychlorinated Biphenyls (PCB)	S	S				Any of a family of industrial compounds produced by chlorination of biphenyl, noted primarily as an environmental pollutant that accumulates in animal tissue with resultant pathogenic and teratogenic effects
	Dioxin/dibenzofuran compounds (see notes at bottom)						A family of more than 70 compounds of chlorinated dioxins or furans. (Examples: Dioxin; Furan; Dioxin TEQ; PCDD; PCDF; TCDD; TCDF; OCDD; OCDF). *Do not use for 'dibenzofuran', which is a non-chlorinated compound that is detected using the semivolatile organics analysis 8270*
Metals	Metals - Other						Cr, Se, Ag, Ba, Cd
	Lead						Lead
	Mercury						Mercury
	Arsenic						Arsenic
Pesticides	Non-halogenated pesticides						Pesticides without halogens (Examples: parathion, malathion, diazinon, phosmet, carbaryl (sevin), fenoxycarb, aldicarb)
	Halogenated pesticides						Pesticides with halogens (Examples: DDT; DDE; Chlordane; Heptachlor; alpha-beta and delta BHC; Aldrin; Endosulfan, dieldrin, endrin)

CONTAMINANT GROUP	CONTAMINANT	*SOIL*	*GROUNDWATER*	*SURFACE WATER*	*AIR*	*SEDIMENT*	DESCRIPTION
Other Contaminants	Radioactive Wastes						Wastes that emit more than background levels of radiation.
	Conventional Contaminants, Organic						Unspecified organic matter that imposes an oxygen demand during its decomposition (Example: Total Organic Carbon)
	Conventional Contaminants, Inorganic						Non-metallic inorganic substances or indicator parameters that may indicate the existence of contamination if present at unusual levels (Examples: Sulfides, ammonia)
	Asbestos						All forms of Asbestos. Asbestos fibers have been used in products such as building materials, friction products and heat-resistant materials.
	Other Deleterious Substances						Other contaminants or substances that cause subtle or unexpected harm to sediments (Examples: Wood debris; garbage (e.g., dumped in sediments))
	Benthic Failures						Failures of the benthic analysis standards from the Sediment Management Standards.
	Bioassay Failures						For sediments, a failure to meet bioassay criteria from the Sediment Management Standards. For soils, a failure to meet TEE bioassay criteria for plant, animal or soil biota toxicity.
Reactive Wastes	Unexploded Ordinance						Weapons that failed to detonate or discarded shells containing volatile material.
	Other Reactive Wastes						Other Reactive Wastes (Examples: phosphorous, lithium metal, sodium metal)
	Corrosive Wastes						Corrosive wastes are acidic or alkaline (basic) wastes that can readily corrode or dissolve materials they come into contact with. Wastes that are highly corrosive as defined by the Dangerous Waste Regulation (WAC 173-303-090(6)). (Examples: Hydrochloric acid; sulfuric acid; caustic soda)

(fill in contaminant matrix above with appropriate status choice from the key below the table)

Status choices for contaminants	
Contaminant Status	**Definition**
B— Below Cleanup Levels (Confirmed)	The contaminant was tested and found to be below cleanup levels. (Generally, we would not enter each and every contaminant that was tested; for example if an SVOC analysis was done we would not enter each SVOC with a status of "below". We would use this for contaminants that were believed likely to be present but were found to be below standards when tested
S— Suspected	The contaminant is suspected to be present; based on some knowledge about the history of the site, knowledge of regional contaminants, or based on other contaminants known to be present
C— Confirmed Above Cleanup Levels	The contaminant is confirmed to be present above any cleanup level. For example—above MTCA method A, B, or C; above Sediment Quality Standards; or above a presumed site-specific cleanup level (such as human health criteria for a sediment contaminant).
RA— Remediated - Above	The contaminant was remediated, but remains on site above the cleanup standards (for example—capped area).
RB— Remediated - Below	The contaminant was remediated, and no area of the site contains this contaminant above cleanup standards (for example— complete removal of contaminated soils).

Halogenated chemicals and solvents: Any chemical compound with chloro, bromo, iodo or fluoro is halogenated; those with eight or fewer carbons are generally solvents (e.g. halogenated methane, ethane, propane, butane, pentane, hexane, heptane or octane) and may also be used for or registered as pesticides or fumigants. Most are dangerous wastes, either listed or categorical. Organic compounds with more carbons are almost always halogenated pesticides or a contaminant or derivative. Referral to the HSDB is recommended if you are unfamiliar with a chemical name or compound, as it contains useful information about synonyms, uses, trade names, waste codes, and other regulatory information about most toxic or potentially toxic chemicals.

Dibenzodioxins and dibenzofurans are normalized to a combined equivalent toxicity based on 2,3,7,8-tetrachloro-p-dibenzodioxin as set out in WAC 173-340-708(8)(d) and in the Evaluating the Toxicity and Assessing the Carcinogenic Risk of Environmental Mixtures using Toxicity Equivalency Factors Focus Sheet (https://fortress.wa.gov/ecy/clarc/FocusSheets/tef.pdf). Results may be reported as individual compounds and isomers (usually lab results), or as a toxic equivalency value (reports).

FOR ECOLOGY II REVIEWER USE ONLY (For Listing Sites):

How did the Site come to be known: ☐ **Site Discovery (received a report):** _____ (Date Report Received)
☑ **ERTS Complaint**
☐ **Other (please explain):** _____

Does an Early Notice Letter need to be sent: ☒ Yes ☐ No
If *No*, please explain why: _____

NAICS Code (if known): _____
Otherwise, briefly explain how property is/was used (i.e., gas station, dry cleaner, paint shop, vacant land, etc.):
_____

Site Unit(s) to be created (Unit Type): ☒ Upland (includes VCP & LUST) ☐ Sediment
If multiple Units needed, please explain why: _____

Cleanup Process Type (for the Unit): ☐ No Process ☑ Independent Action
☐ Voluntary Cleanup Program ☐ Ecology-supervised or conducted
☐ Federal-supervised or conducted

Site Status: ☐ Awaiting Cleanup ☐ Construction Complete – Performance Monitoring
☒ Cleanup Started ☐ Cleanup Complete – Active O&M/Monitoring
☐ No Further Action Required

Model Remedy Used? ☐
If yes, was this a transformer spill? ☐

Site Manager (Default: Southwest**):** Southwest

Specific confirmed contaminants include:

_____ in Soil

_____ in Groundwater

_____ in Other (specify matrix: _____)

Facility/Site ID No. (if known):
_____

Cleanup Site ID No. (if known):
_____

COUNTY ASSESSOR INFO: Please attach to this report a copy of the tax parcel/ownership information for each parcel associated with the site, as well as a parcel map illustrating the parcel boundary and location.

Additional or Supplemental Information from Observations Page

Please use this box for any text that requires special formatting