



FILE COPY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 14, 2019

Sound Earth Strategies
c/o Mr. Ryan Bixby
2811 Fairview Avenue East, Suite 2000
Seattle, Washington 98102

RE: North Colfax Petroleum Contamination Site – Formal response of the Supplemental Remedial Investigation report dated September 25, 2014

Dear Mr. Bixby:

The Washington Department of Ecology (Ecology) received your soil assessment report. The report documents the additional soil assessment activities completed at the North Colfax Site. The soil sample results collected from the September 2014 additional assessment activities indicate soils exceeding the MTCA Method A cleanup levels remain at the Colfax Grange and Time Oil Properties with maximum gasoline-range concentrations detected at 360 mg/Kg and 2,000 mg/Kg, respectively. Expected soil attenuation rates for each property were calculated at 4.5 years (March 2019) and 14.5 years (March 2029), respectively. It is reasonable to conclude that soil at the Colfax Grange property will likely come into compliance within the next month or so. However, soil contamination appears to persist at the Time Oil property and will likely remain for the next ten years. The Cenex property appears to have attenuated below MTCA Method A cleanup levels and additional assessment is not warranted.

After review of the Agreed Order 4599 in regards to schedule, cleanup levels, and remediation and assessment activities, it appears that the proposed additional soil assessment work outlined in an email communication dated May 25, 2018 would fit within the current Agreed Order. As you stated in your previous email, the work plan would need review and approval by Ecology as outlined in the Agreed Order.

The driving mechanism of MTCA is to demonstrate site conditions are protective of groundwater and that all reasonable remedial activity has been utilized in order to demonstrate protection of groundwater. However, the employment of institutional controls offer avenues of achieving satisfaction of cleanup and remediation activity defined by the Agreed Order. Ecology would like to reiterate based on the current Site conditions, presumed residual petroleum contaminated soil (PCS), soil lithology, and perimeter groundwater sampling indicating that groundwater contamination, if any, appears to remain onsite, the **Site currently satisfies the Agreed Order's remedial action and cleanup of contamination. However, the continued presence of groundwater contamination requires an institutional control under MTCA.**



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Prior to any additional soil assessment, Ecology recommends a comprehensive groundwater assessment be completed at wells selected by Ecology to determine if groundwater contamination persists. If contamination exists at concentrations above MTCA Method A groundwater cleanup levels, then a demonstration regarding site soils is unnecessary and the Site status will remain listed as "performance monitoring" and institutional controls will be required.

If after two consecutive groundwater monitoring events with groundwater sample results are below MTCA Method A, then Ecology believes a demonstration has been made to indicate soil concentrations have attenuated and is protective of groundwater.

We welcome your thoughts and I am available any time to review a proposed Work Plan for the additional soil and groundwater assessment work.

Sincerely,



Evelyn Cummings

Site Manager

Toxics Cleanup Program

Eastern Regional Office