

PSE - One # 124

February 3, 2000

Bob Boyd
PugetWestern, Inc.
19515 North Creek Parkway, Suite 310
Bothell, Washington 98011.

Dear Mr. Boyd:

Re: Voluntary Cleanup Program, Parcel 3 of Puget Sound Energy's Former
Grady Way Complex Property, 915 South Grady Way, Renton, Washington.
TCP I.D. #NW0429. **PSE Grady Way Parcel 3 is VCP project # NW0430**

Thank you for submitting your Final Cleanup Report and request for Ecology's review for a no further action determination. Ecology appreciates your initiative in pursuing a voluntary cleanup under the Model Toxics Control Act.

The Washington State Department of Ecology's Toxics Cleanup Program has reviewed the following information regarding the Parcel 3 of Puget Sound Energy's Former Grady Way Complex Property, 915 South Grady Way, Renton, Washington:

1. Final Report - Ground Water Quality Testing, Underground Transformer Oil Tank, Service Center, Renton, Washington - January 15, 1988.
2. Final Report - Tank Removal and Soil Excavation, Underground Transformer Oil, Tank Service Center, Renton, Washington" - March 3, 1988. By GeoEngineers, Project No. 0186-61-4.
3. Environmental Site Assessment, Grady Way Complex Property, Renton, Washington - April 29, 1998. By GeoEngineers, Project No. 0186-407-00-1150/042998.
4. 1998 Site Cleanup Activities, Grady Way Complex Property, Renton, Washington (Volumes I and 11) - December 23, 1998. By Geo-Engineers, Project No. 0186-407-00-1150.

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5. Confirmation Ground Water Sampling, First Quarter 1999, Grady Way Complex Property, Renton, Washington - June 7, 1999. By Geo-Engineers, Project No. 0186-407-00-1150/060799.
6. Confirmation Ground Water Sampling, Second Quarter 1999, Grady Way Complex Property, Renton, Washington - July 22, 1999. By GeoEngineers, Project No. 0186-407-00-1150/72299.
7. Confirmation Ground Water Sampling, Third Quarter 1999, Grady Way Complex Property, Renton, Washington - December 21, 1999. By GeoEngineers, Project No. 0186-407-00-122199.
8. Confirmation Ground Water Sampling, Fourth Quarter 1999, Grady Way Complex Property, Renton, Washington - November 24, 1999. By GeoEngineers, Project No. 0186-407-00-1150/112499.
9. Supplemental Site Characterization and Site Closure Report, Grady Way Complex Property, Renton, Washington - December 21, 1999. By GeoEngineers, Project No. 0186-407-00-1150/122199.
10. Letter of Notification, City of Renton, Subsurface Contamination beneath Talbot Road, Public Right-of-way, dated September 24, 1999 from Mr. Neil Watts, Department of Land Planning and Development.
11. Restrictive Covenant, Parcel 3 - Formerly Part of Puget Sound Energy Grady Way Complex Property, 915 South Grady Way, Renton, Washington, King Co #2000 012 5001281 of January 21, 2000.
12. Groundwater Compliance Monitoring Plan, Parcel 3 - Puget Sound Energy Grady Way Complex, by GeoEngineers, Project # 0186-407-00-1150 of February 1, 2000.

The reports listed above will be kept in the Central Files of the Northwest Regional Office (NWRO) of Ecology for review by appointment only. Appointments can be made by calling Sally Perkins at the NWRO at (425) 649-7190.

Based upon the information in the reports listed above, Ecology has determined that, at this time, the release of petroleum hydrocarbons, arsenic, polychlorinated biphenyls (PCBs) and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into soil and/or groundwater at the site does not pose a threat to human health or the environment.

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Therefore, Ecology is issuing this determination that no further remedial action is necessary at this site under MTCA, chapter 70.105D RCW. However, please note that because your actions were not conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(i) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

Because dissolved petroleum hydrocarbons, PCBs and arsenic have been detected at concentrations exceeding State Standards in groundwater at the site, you must conduct the necessary groundwater compliance monitoring and operation and maintenance to assure that this site does not pose a threat to human health or the environment. The residual arsenic appears to be characteristic of local background conditions and unrelated to past on-site activities

The groundwater compliance monitoring program shall include sampling and analysis for total petroleum hydrocarbons (diesel and oil), PCBs and arsenic. The designated sampling locations for the groundwater compliance monitoring program shall include monitoring wells GMW-3/3a, GMW-4/4a and GMW-5. These groundwater compliance monitoring wells must be permanently marked and maintained to ensure the integrity of the groundwater sampling results.

Semi annual (during the high and low water tables) groundwater compliance monitoring will be conducted every other year for a total of 5 years starting in the year 2000, 2002 and 2004 for total petroleum hydrocarbons and PCBs as outlined in Table 1 of the Groundwater Compliance Monitoring Plan. Groundwater sampling for arsenic shall be limited to obtaining baseline data of four consecutive quarterly analyses only.

If the monitoring events indicate that the contaminants of concern are below applicable state standards, Ecology may not require further groundwater monitoring activities and PSE may petition Ecology for groundwater compliance review. Additionally, in the event that the monitoring data shows increased presence of groundwater contaminants at concentrations exceeding state standards indicating plume movement, Ecology may require a contingency plan to be developed and implemented to protect human health and the environment.

All sampling results and QA/QC documentation must be sent to Ecology at the end of each reporting quarter. An annual Report as outlined in the approved Groundwater Compliance Monitoring Plan for the Site must be sent to Ecology at the end of each reporting year. Failure to conduct the necessary monitoring and maintenance results in the automatic withdrawal of Ecology's no further action determination.

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In addition, the Restrictive Covenant filed on your property dated January 21, 2000 is a condition to maintain Ecology's no further action determination. The Restrictive Covenant is attached to this letter as Attachment A.

Ecology's no further action determination automatically terminates and will have no force and effect if you violate any portions of the Restrictive Covenant.

Ecology's no further action determination is made only with respect to the total petroleum hydrocarbons, CPAHs, arsenic and PCBs present at the site identified in the independent remedial action report(s) dated from January 15, 1988, through February 1, 2000. This no further action determination applies only to the area of the property affected by the release identified in the report at Parcel 3 – Formerly Puget Sound Energy Grady Way Complex Property, located at 915 South Grady Way, Renton, Washington. It does not apply to any other release or potential release at the property, any other areas on the property, nor any other properties owned or operated by Puget Sound Energy. This no further action determination does not apply to remedial actions determined necessary as a result of the groundwater compliance monitoring.

Ecology will update its Confirmed and Suspected Contaminated Site database to reflect this "No Further Action" determination. Your site will not appear in future publications.

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 determination.

If you have any questions, please contact me at (425)-649-7112.

Sincerely,

Nnamdi Madakor
Senior Hydrogeologist
Toxics Cleanup Program, NWRO

NM:nm

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Enclosure