



FILE REVIEW MEMORANDUM

TO: FILE

FROM: Tim Mullin, LHG, TCP-SWRO, VCP/II-SHA/LUST unit supervisor

SUBJECT: ERTS 693796

SITE: Grays Harbor PUD Transformer Release ROW 6 Johnson Rd; FSID: 100003119, CSID: 17133

DATE: June 9, 2025

Background

Grays Harbor PUD Transformer Release ROW 6 Johnson Rd is a cleanup site located at 6 Johnson Rd, Aberdeen, Washington. The contaminated soil resulting from a transformer release of an unknown quantity of "PCB-FREE" mineral oil was removed in 2019. One confirmation soil sample was collected from the base of the excavation; ESN Northwest Chemistry Laboratory's analysis returned "ND" for mineral oil. However, due to unresolved questions about the solvent used during cleanup, it was determined necessary to add the site to the Confirmed and Suspected Contaminated Sites List.

Current Status

During file review in 2025, it was determined that Grays Harbor PUD may be able to provide the information necessary to resolve this listing. The following clarifications to the previously provided documentation were provided by Ben Bouch, Safety & Environmental Director, Grays Harbor PUD, on June 5th, 2025:

- The transformer's mineral oil capacity was not documented on the faceplate or in the PUDs system, but is estimated at approximately 30 gallons based on similar transformer

models. Additionally, the leak was reportedly small and did not result in equipment failure, therefore, the PUD estimates the amount lost to $\leq 50\%$ capacity.

- The solvent used in 2019 cannot be confirmed but was likely Citra-Solv. The Safety Data Sheet (SDS) was provided to TCP. The SDS for this product describes the standard solvent usage when cleaning up mineral oil releases: “it would be in the aerosol can form and they typically just spray the oil on the concrete vault lids and wipe any residue off with rags and diapers before they set the new transformer unit. So the amount of solvent used would be fairly minimal and evaporate fairly quick.”
- Based on a map of the transformer location, the coordinates for the location of the transformer are: Lat: 47.06762, Long: -123.77163 on Grays Harbor County Parcel: 765500000500.

A Terrestrial Ecological Evaluation (TEE) was/was not completed for the site in accordance with MTCA. However, because mineral oil is not a chemical of ecological concern (WAC 173-340, Table 749-2), the release area was less than 350 square feet (WAC 173-340-7492 (2)(a)(i)), and remedial excavation to remove soil with residual mineral oil was completed, remaining soil within the excavation footprint was deemed protective of terrestrial plants and animals relative to mineral oil.

Determination

Ecology recommends:

- 1) Updating the location and owner information for this release location.
- 2) No Further Action, with listing to the No Further Action Sites List.

The recommendations in this file review memorandum are based on the best available information at the time of drafting. New or additional information or data may change the recommendations and determination presented herein.