



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

August 6, 2025

Stefano Schnitger
Chehalis Generation Facility
1813 Bishop Road
Chehalis, WA 98532-8732
Stefano.Schnitger@pacificorp.com

Re: Technical assistance for the following contaminated Site

Site name: Chehalis Power LP Generation Facility
Site address: 1813 Bishop Road Chehalis, 98532 Lewis
Facility/Site ID: 3336951
Cleanup Site ID: 11776
VCP Project ID: SW1246

Dear Stefano Schnitger:

On May 6, 2025, the [Washington State Department of Ecology](https://ecology.wa.gov/)¹ received your request for a written opinion regarding the sufficiency of your independent cleanup of the Chehalis Power LP Generation Facility (Site), under the [Voluntary Cleanup Program](https://ecology.wa.gov/vcp) (VCP).² This letter provides our opinion and analysis. We provide this opinion under the authority of the [Model Toxics Control Act](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305)³ (MTCA), chapter [70A.305](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305)⁴ RCW. This technical assistance is provided under the requirements of WAC [173-340-515](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true#173-340-515)⁵(5).

¹ <https://ecology.wa.gov/>

² <https://ecology.wa.gov/vcp>

³ <https://apps.ecology.wa.gov/publications/SummaryPages/9406.html>

⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true#173-340-515>

Issue presented and opinion

- Is additional cleanup work necessary to resolve data gaps, based on Site characterization activities described in the Report?

Additional investigation is needed to understand the occurrence of PFAS at the Site.

Site description

This opinion applies to the Site described here. The Site is defined by the nature and extent of contamination associated with the following releases:

- Mineral oil into soil and groundwater.
- Perfluoroalkyl substances (PFAS) including perfluorobutanoic acid (PFBA), perfluorohexanoic acid (PFHxA), and perfluorooctanoic acid (PFOA) into groundwater.

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

Basis for our opinion

Ecology bases this opinion on information in the documents listed in Appendix A.

You can request these documents by filing a [public records request](#).⁶ For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on the [Cleanup Site webpage](#).⁷

This opinion is void, if anything in the documents is materially false or misleading.

⁶ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁷ <https://apps.ecology.wa.gov/cleanupsearch/site/11776#site-documents>

Analysis of the cleanup

Based on our review of the Report, Ecology has determined the following regarding your cleanup:

In February 2025, additional groundwater sampling was completed at MW-1 and MW-2R. The additional groundwater sampling event was completed to address data gaps regarding aqueous film forming foam (AFFF) use as part of the 2011 generation step-up transformer #1 (GSU#1) fire response. PFAS are common chemicals in legacy and modern AFFF and is suspected to have been discharged at the Site due to the documented AFFF use.

The February 2025 sampling data indicated the presence of three PFAS isomers which may be attributable to some AFFF formulations but alternatively may represent other sources. Provided the unknown aspect of background contributions of PFAS locally, Ecology needs additional information regarding the nature and extent of PFAS at the Site.

Expanded Investigation Area

Ecology suggests sampling all Site monitoring wells at least once to determine the PFAS distribution in groundwater.

Ecology also recommends collecting soil samples both outside of the GSU#1 excavation area, beyond the terminal excavation depths, and along the probable fire suppression fluid overflow path. Soil was encountered below the gravel at sample location SG#1⁸ at an approximate 18-inch depth but was not encountered at sample locations SG#2 or SG#3. An additional potential area to target for soil sampling may be the ditch lines near, but beyond, the GSU#1 excavation area. It appears that gravel from the ditches was removed and replaced as part of the spill response, but extensive soil excavation did not occur. Other potential soil sampling areas may be locations closer to the GSU#1 containment but at depths below the previous excavation (e.g., SG#2 or near MW-2R).

An area where no work was completed and that would likely provide a representative location to collect undisturbed soil samples from, would be from below the roadbed near GSU#1 and the associated ditch line.

⁸ KTA, *Cleanup Action Report*, August 2012. Appendix D.

Additionally, Ecology recommends collecting soil and groundwater from a location north of GSU#1 to evaluate if PFAS contaminations exists upgradient of the AFFF use area. Sampling near the Station's north security fence may also be acceptable.

As PFAS is persistent in soil as well as groundwater, evaluation of both media would provide useful information regarding the nature of the AFFF used and whether PFAS was a component.

Expanded PFAS Analysis

As PFAS has been detected at the Site, Ecology suggests adjusting the PFAS analytical suite to reporting the full USEPA Method 1633 isomer suite.

Further, please verify that the data is reported to the lowest feasible analytical detection limits.

Mineral Oil Release

At this time, Ecology does not need additional information regarding the mineral oil releases at the Site.

Electronic Information Management Database Upload

All Site data must be uploaded to Ecology's electronic information management (EIM) database.⁹ Please upload recent analytical data to the EIM database before your next opinion request. Ecology has previously reminded about this requirement and will not

Limitations of the opinion

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 doesn't resolve or alter a person's liability to the state or protect liable persons from contribution claims by third parties.

⁹ WAC 173-340-840

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).¹⁰

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts would make that determination.

See RCW [70A.305.080](#)¹¹ and WAC [173-340-545](#).¹²

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).¹³

Contact us for more information

Thank you for choosing to clean up your Site under the VCP. After addressing our comments, you may request another review of your cleanup activities. If you have any questions about this opinion, please contact me at 360-407-6266 or Joseph.Kasperski@ecy.wa.gov. We look forward to receiving your next submittal or report.

Sincerely,



Joe Kasperski, LG
Southwest Region, Toxics Cleanup Program

JKK / at

¹⁰ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

¹¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

¹² <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

¹³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

Appendix: A – Basis for the opinion: Reviewed documents list

Copy: Jeremy Smith, Chehalis Generation Facility, jeremy.smith@pacificorp.com
Daniel Landry, A&M Engineering and Environment Services, Inc,
dlandry@aandmengineering.com
Sara Randolph, Washington State EFSEC, Sara.Randolph@efsec.wa.gov
Tim Mullin, Ecology, tim.mullin@ecy.wa.gov
Ecology Site File

Appendix A

Basis for opinion: Reviewed documents list

The following documents were reviewed for this opinion.

1. Hill West Environmental, *Groundwater Monitoring Report – February 2025*, May 6, 2025.
2. Hill West Environmental, *Groundwater Monitoring Culvert Decommissioning Report*, April 24, 2025.
3. Ecology, *No further action likely at the following site: Chehalis Power LP Generation Facility*, December 12, 2024.
4. Hill West Environmental, *Chehalis Power Plant Transformer Spills Additional Site Characterization Report*, August 16, 2024.
5. Ecology, *Further Action at the following Site: Chehalis Power LP Generation Facility*, November 30, 2023.
6. Hill West Environmental, *Chehalis Power Plant Transformer Spill Additional Site Characterization Work Plan*, March 8, 2023.
7. Ecology, *Further Action at the following Site: Chehalis Power LP Generation Facility*, June 26, 2017.
8. KTA Associates, Inc (KTA), *Cleanup Action Report*, July 6, 2016.
9. Ecology, *Further Action at the following Site: Chehalis Power LP Generation Facility*, November 20, 2012.
10. KTA, *Terrestrial Ecological Evaluation Form*, August 10, 2012.