

Ecody



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office  
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

September 5, 2025

Pam Hanson  
Future Care LLC  
Po Box 576  
Union, WA 98592  
[cameo@hctc.com](mailto:cameo@hctc.com)

**Re: No Further Action opinion for the following contaminated Site**

**Site name:** Cameo Shop (aka Cameo Boutique)  
**Site address:** 6871 E State Route 106, Union, WA 98592  
**Facility/Site ID:** 82533369  
**Cleanup Site ID:** 17205  
**VCP Project No.:** SW1857

Dear Pam Hanson:

The Washington State Department of Ecology (Ecology) received your request on August 8, 2025, for an opinion regarding the sufficiency of your independent cleanup of the Cameo Shop (aka Cameo Boutique) facility (Site) under the Voluntary Cleanup Program (VCP).<sup>1</sup> Your opinion request, including upload of all required electronic data, was completed on September 5, 2025. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#) RCW.<sup>2</sup>

## Opinion

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Ecology has determined that no further remedial action is necessary to clean up contamination at the Site. This is based on successful implementation of the interim actions completed, as an equivalent permanent remedial solution, and completed groundwater compliance monitoring.

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<sup>1</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

<sup>2</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter [173-340 WAC](#)<sup>3</sup> (collectively called “MTCA”).

## Site Description

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This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons as gasoline (TPH-G) into soil.
- Ethylbenzene into the groundwater.
- Lead into groundwater.

This opinion is limited to those releases identified for the Site. **Enclosure A** includes Site description, a Site history, and diagram.

A parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel associated with this Site are affected by other sites.

## Basis for the Opinion

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Ecology bases this opinion on information in the documents listed below.

1. Simpson Geosciences, Groundwater Monitoring Report, August 1, 2025.
2. Ecology, Re: No Further Action Likely at the following Contaminated Site, April 21, 2025.
3. Simpson Geosciences, Site Remediation, Characterization and Groundwater Monitoring Report, January 31, 2025.
4. Cascade Environmental Services, Inc., Site Assessment Report, August 1999.

You can request these documents by filing a [records request](#).<sup>4</sup> For help making a request, contact the Public Records Officer at [recordsofficer@ecy.wa.gov](mailto:recordsofficer@ecy.wa.gov) or call (360) 407-6040. Before making a request, check if the documents are available on the [CSID 17205 cleanup site search page](#).<sup>5</sup>

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<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

<sup>4</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

<sup>5</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/17205>

This opinion is void if information in any of the listed documents is materially false or misleading.

## **Analysis of the Cleanup**

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Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

### **Characterizing the Site**

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. **Enclosure A** describes the Site, provides a brief Site history, and provides a relevant Site diagram (figure). Further cleanup details and history are provided in our opinion letter dated April 21, 2025.

### **Additional Groundwater Sampling**

Compliance groundwater monitoring occurred at all four Site monitoring wells in December 2024, April 2025, and July 2025. All results were below cleanup levels (CULs), and most concentrations were not detected at laboratory reporting limits.

At MW-1, in order to meet the requirements of Table 830-1,<sup>6</sup> the source area monitoring well was tested for additional contaminants in July 2025. Analytical results show no exceedances of MTCA cleanup levels for any contaminant. While total lead was detected in groundwater, dissolved lead was not detected in groundwater. Additionally, there was no gasoline, benzene, toluene, ethylbenzene, or total xylenes (BTEX), 1,2-dibromoethane (EDB), or 1,2-dichloroethane (EDC) detected at MW-1 in July 2025. The total lead value appears to be anomalous, likely related to turbidity. Ecology reviewed the dissolved lead value in groundwater sampled from MW-1 as representative of groundwater conditions, and lead was not detected at the analytical reporting limit of 1 micrograms per liter ( $\mu\text{g/L}$ ).

### **Air/Vapor Pathway**

Based on contaminant concentrations in soil and groundwater are less than the MTCA Method A CULs, the vapor/air pathway is more likely than not incomplete.

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<sup>6</sup> WAC 173-340-830(6) and WAC 173-340-900

### Environmental Information Management (EIM) Database

In accordance with WAC 173-340-840 and Toxics Cleanup Policy 840, all Site data were uploaded and accepted into Ecology's Environmental Information Management (EIM) system. The VCP site manager reviewed and approved the data in EIM on September 5, 2025.

### Setting cleanup standards

Ecology has determined the CULs and points of compliance you set for the Site meet the substantive requirements of MTCA.

Points of compliance applicable to the Site:

Media	Points of Compliance
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. WAC 173-340-740 (6)(d)  Met, based on successful remediation of contaminated soils and confirmatory soil sampling results.
Soil- Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. WAC 173-340-747  Met, based on successful remediation of contaminated soils and confirmatory soil sampling results.
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. WAC 173-340-720(8)(b)  Met based on groundwater results.

There is no surface water, sediment, nor wetlands at the Site. However, as the Site is on a parcel adjacent to the marine waters of the Puget Sound, cleanup levels protective of marine surface water appear to be appropriate. Groundwater extraction by supply well is unlikely at the property based on the proximity to marine water.

Cleanup levels applicable to the Site:

<b>Hazardous Substance<sup>7</sup></b>	<b>MTCA Soil Cleanup Level (mg/kg)</b>	<b>MTCA Surface Water Cleanup Level (µg/L)<sup>8,9</sup></b>
TPH as gasoline	100	1,700
Benzene	0.03	1.6
Ethylbenzene	6	21
Toluene	7	102
Total Xylenes	9	106
Lead	250	210 <sup>10</sup>

Additional Table 830-1 required groundwater sampling at the source area monitoring well MW-1, for MTBE, naphthalenes, and EDB and EDC did not result in any detections, and are not considered Site COCs. Total lead, while detected at MW-1, is the monitoring well farthest away from surface water. The groundwater sample at MW-1 was not field filtered, which increases the likelihood turbidity and sediment captured in the groundwater sample. Additionally, dissolved lead was not detected in groundwater sampled at MW-1. The total lead concentration in groundwater sampled from MW-1 was less than the MTCA cleanup level protective of marine surface water (acute).

Ecology concurs with using MTCA Method A CULs to evaluate analytical results for Site COCs in soil. Ecology acknowledges that MTCA Method A CULs were used to screen groundwater results and that analytical concentrations of Site COCs in groundwater sampled did not exceed those CULs. The Site is located about 120 feet south from Hood Canal/Puget Sound. Therefore, CULs protective of marine surface water acute risk were used to compare analytical results from groundwater sampled at the Site. All contaminant concentrations in groundwater were less than the established CULs.

Though typically four consecutive quarterly events are needed to demonstrate compliance for groundwater, it is Ecology's opinion that three consecutive quarterly events, based on the lack of detections of the primary contaminants of gasoline and benzene in groundwater

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<sup>7</sup> Based on exceedance of screening or cleanup level identified at the Site, per data collected to date.

<sup>8</sup> Protective of marine surface waters for the more stringent cleanup level protective of human health or aquatic receptors. The Site is about 120 feet south of Puget Sound.

<sup>9</sup> Implementation Memorandum No. 23, Concentrations of Gasoline and Diesel Range Organics Predicted to be Protective of Aquatic Receptors in Surface Waters.

<sup>10</sup> Cleanup level is protective of marine surface water (acute).

indicates that the Site does not represent a risk and sufficient groundwater monitoring has been completed to demonstrate compliance with established cleanup levels.<sup>11</sup>

Ecology considered applicable state and federal applicable laws as part of the cleanup and did not require adjusting the points of compliance and cleanup levels provided above.

## Selecting the cleanup action

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Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The selected cleanup action was excavation with off-Site disposal (at a permitted facility) and air sparge using a blower system. Ecology concurs that the most permanent cleanup remedy was selected and that petroleum-contaminated soils appear to have been removed to the maximum extent practicable.

At this Site, Groundwater Model Remedy No. 1<sup>12</sup> applied. Thus, Ecology reviewed this opinion request per the model remedy option, and it second of two free opinion reviews under the model remedy process. Additionally, applicability of a petroleum model remedy at a Site means that a feasibility study (FS) and disproportionate cost analysis (DCA) is not required.

## Implementing the cleanup action

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Ecology has determined your cleanup meets the standards set for the Site and the minimum substantive requirements of MTCA.

Interim cleanup actions taken at the Site, which are cumulatively equivalent to a permanent cleanup action, are:

1. In 1999, three gasoline-containing underground storage tanks were removed along with limited petroleum-contaminated soils.
2. In 2024, a few cubic yards of petroleum contaminated soil were removed. A sparge line and blower system was installed to remove any potential soil gas. The blower system operates nightly for at least 4 hours. Four monitoring wells, MW-1 through MW-4, were installed to determine compliance for groundwater.

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<sup>11</sup> WAC 173-340-360(2)

<sup>12</sup> Ecology Publication 16-09-057, Model Remedies for Sites with Petroleum Impacts to Groundwater, revised December 2017.

3. Nightly operation of an air sparge line and blower system. System operation was terminated in July 2025.

Soil sampling results and groundwater monitoring results confirmed that all contaminant concentrations at the Site were in compliance with cleanup levels at standard points of compliance. The air sparge line and blower system operation can be terminated. While four quarterly consecutive groundwater monitoring events are typically needed to demonstrate Stage III compliance, Ecology determined that the results of three consecutive quarterly groundwater monitoring events met the requirements of Stage III monitoring. This was because the primary contaminant concentrations were not detected over three quarters, and a fourth quarter was not expected to generate a different result. Additionally, based on physical location of the property abutting Puget Sound, installation or use of groundwater for drinking water supply is highly unlikely.

The cleanup performed at the Site meets the threshold requirements under WAC 173-340-360(2), and:

1. Is protective of human health and the environment.
2. Is in compliance with cleanup standards.
3. Is in compliance with applicable state and federal laws.
4. Used permanent solutions to the maximum extent practicable.
5. Provides for a reasonable restoration timeframe.
6. Sufficiently considers public concerns.
7. Does not require institutional controls or compliance monitoring.

If needed, please dispose of any remaining investigation derived waste (IDW). Additionally, to meet WAC 173-160-460, please decommission the four monitoring wells at the Site.

## **Limitations of the Opinion**

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### **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 does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

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\(4\)](#).<sup>13</sup>

### **Opinion does not constitute a determination of substantial equivalence**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW [70A.305.080](#)<sup>14</sup> and WAC [173-340-545](#).<sup>15</sup>

### **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\(6\)](#).<sup>16</sup>

## **Termination of Agreement**

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Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. SW1857.

Sincerely,



Tim Mullin, LHG  
Toxics Cleanup Program  
Southwest Region Office

TCM: kw

Enclosure: A – Site Description, History, and Diagrams

cc: Richard Simpson, LHG, Simpson Geosciences, [simpsongeosciences@outlook.com](mailto:simpsongeosciences@outlook.com)  
Marian Abbett, PE, Ecology, [marian.abbett@ecy.wa.gov](mailto:marian.abbett@ecy.wa.gov)  
Fiscal, VCP Fiscal Analyst, [ecyrevcp@ecy.wa.gov](mailto:ecyrevcp@ecy.wa.gov)  
TCP, Operating Budget Analyst, [rachel.homchick@ecy.wa.gov](mailto:rachel.homchick@ecy.wa.gov)  
Ecology Site File

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<sup>13</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

<sup>14</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>15</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>16</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

# Enclosure A

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Site Description, History, and Diagrams

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## Site Description

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**Property History and Current Use:** The Site is wholly contained within Mason County parcel 322335000002, in Union, Washington (Property). The Property was used as a service station, approximately from the 1930s-1960s. The property is now zoned commercial and used as a boutique shop.

**Property Vicinity:** The Site is located in a rural residential area. Puget Sound lies about 120 north of the Site, and State Route 106 borders the Property on the south.

**Soils and Geology:** Local topography is flat. Soils, to the maximum depth explored of about 15 feet below ground surface (bgs), is mainly silty sands with some gravel.

**Groundwater:** Based on groundwater data from monitoring wells MW-1 through MW-4, depth to water is approximately 1.37-1.61 feet below top of casing (BTOC) in monitoring wells MW-3 and MW-4, near Puget Sound. Depth to water in monitoring wells MW-1 and MW-2 furthest from the Puget Sound is approximately 7.12-7.20 feet BTOC. Groundwater appears to be tidally influenced in this area of Hood Canal (Puget Sound). Groundwater flow direction has generally been calculated as west-northwest to north-northwest towards Puget Sound.

**Terrestrial Ecological Evaluation (TEE):** The Site was excluded from further TEE based on a simplified TEE.

**Surface Water/Sediment/Storm Water/Septic Systems:** The Site has been and will be serviced by city water and sewer. Utilities are currently disconnected while construction of the new apartment complex begins. Stormwater systems are to be installed for the apartment complex as well.

There is no naturally-occurring surface water at the Site. The nearest natural surface water is Puget Sound/Hood Canal, located about 120 feet north of the Site. There is no sediment or wetlands at the Site.

**SHARP:** Ecology completed a Site hazard assessment rating procedure on the Site, and the SHARP returned an overall score of low. The Site is not anticipated to pose a risk to human health and the environment.

## **Site History**

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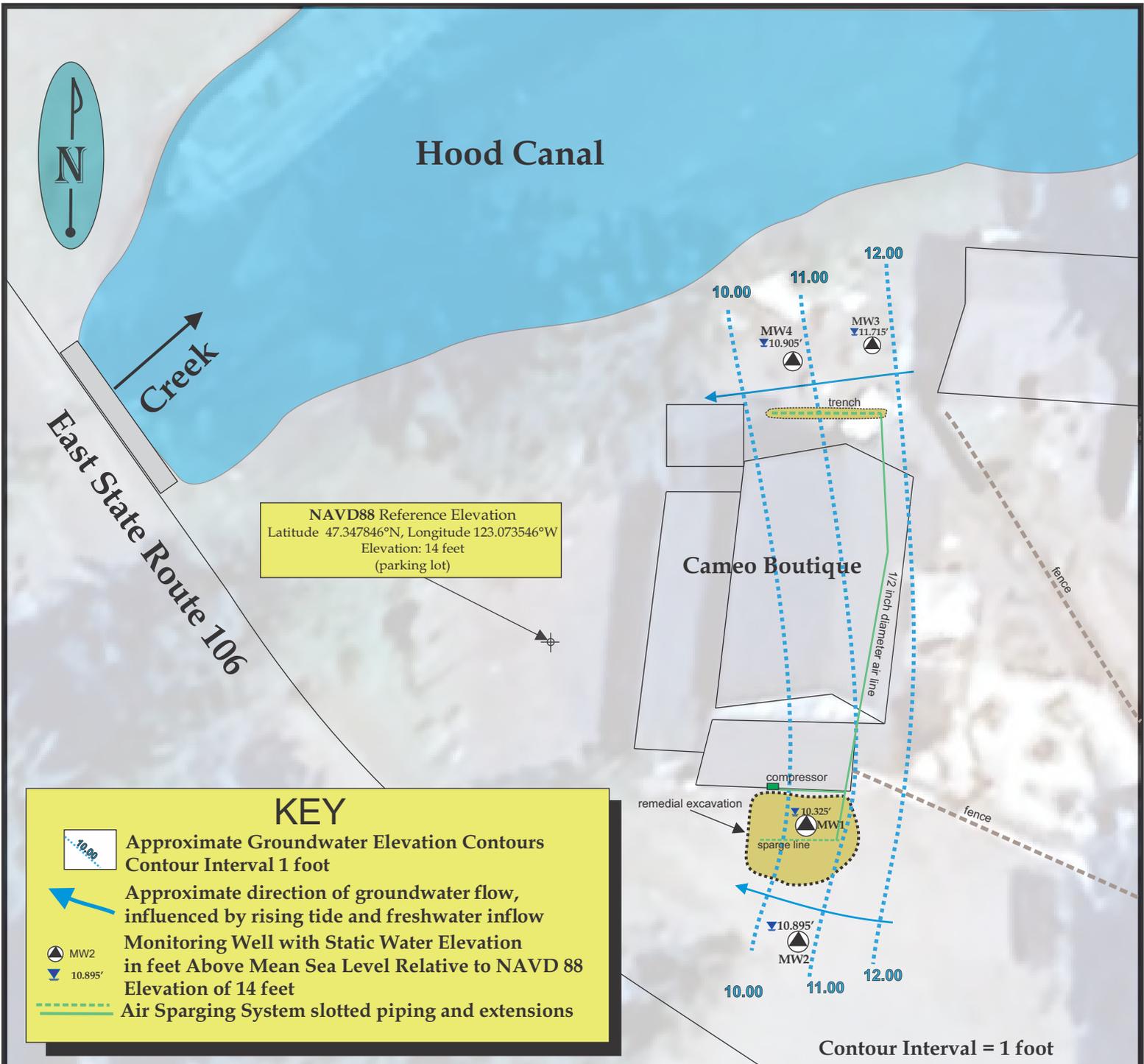
Three gasoline underground storage tanks (USTs) were removed during due diligence activities in August 1999. Gasoline in soil could not be removed at the time because of risk to the building foundation. In 2024, additional interim action was taken to remove a few cubic yards of petroleum-contaminated soil. Additionally, four monitoring wells were installed, MW-1 through MW-4. Compliance groundwater monitoring was completed in December 2024, April 2025, and July 2025. An air sparge line was connected from the source area (tank removal), with a blower system operating nightly until July 2025. The Property continues to operate as a boutique shop.

## Site Diagram

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Figures 3-5 (Simpson Geosciences).....Groundwater Elevation Contours

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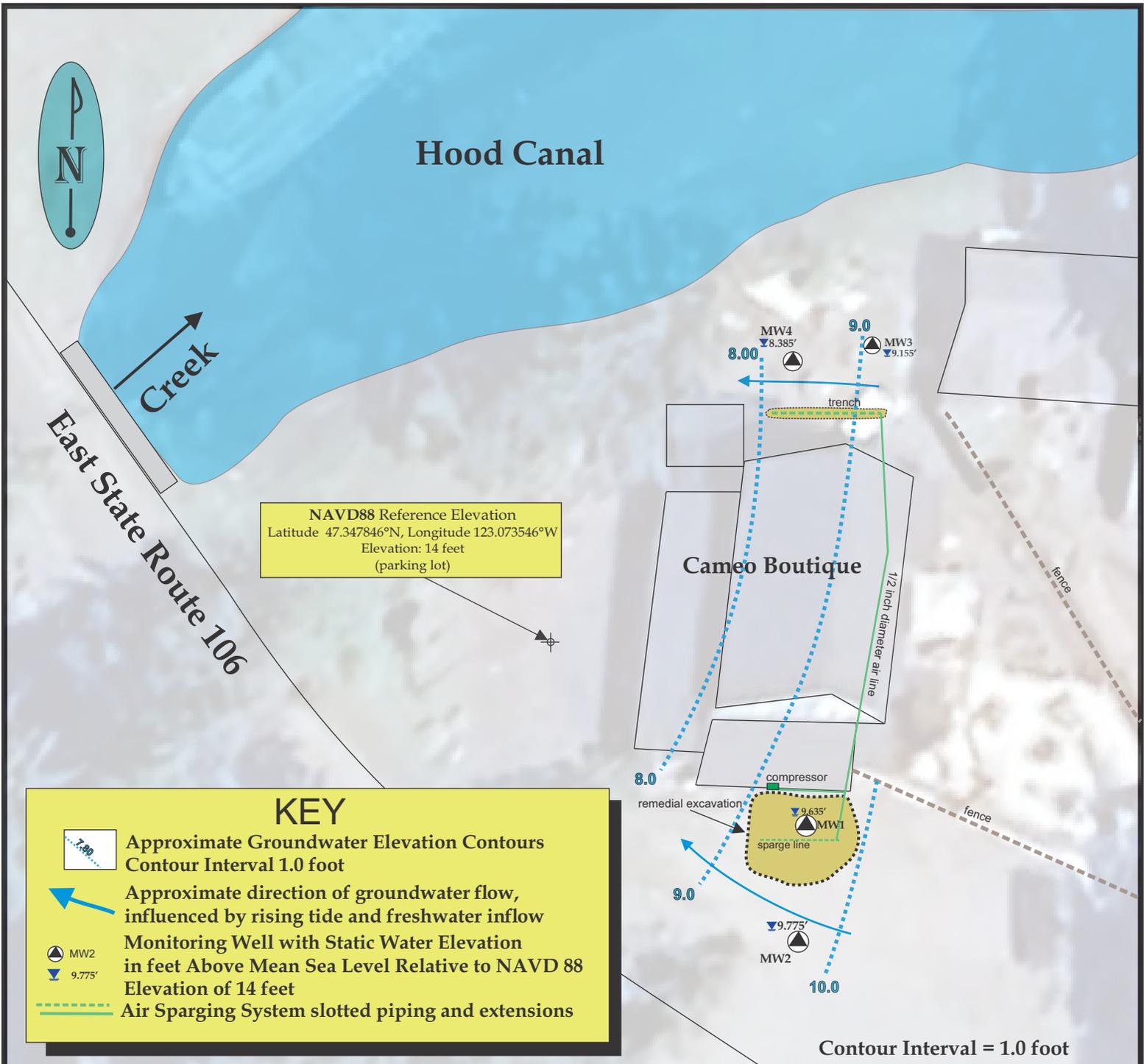


**FIGURE 3**  
**SITE PLAN SHOWING**  
**GROUNDWATER ELEVATION CONTOURS**  
**Fourth Quarter: December 21, 2024**  
**6871 East State Route 106, Union, WA**  
**Cameo Boutique**  
**Depth to Static Water Measured December 20, 2024**  
 Approximate scale 1 inch = 25 feet

NAVD88 Elevation of 14 feet above mean sea level  
 Latitude 47.347846°N, Longitude 123.073546°W



Project Number SG2024107  
**SIMPSON GEOSCIENCES**  
 Redmond, Washington



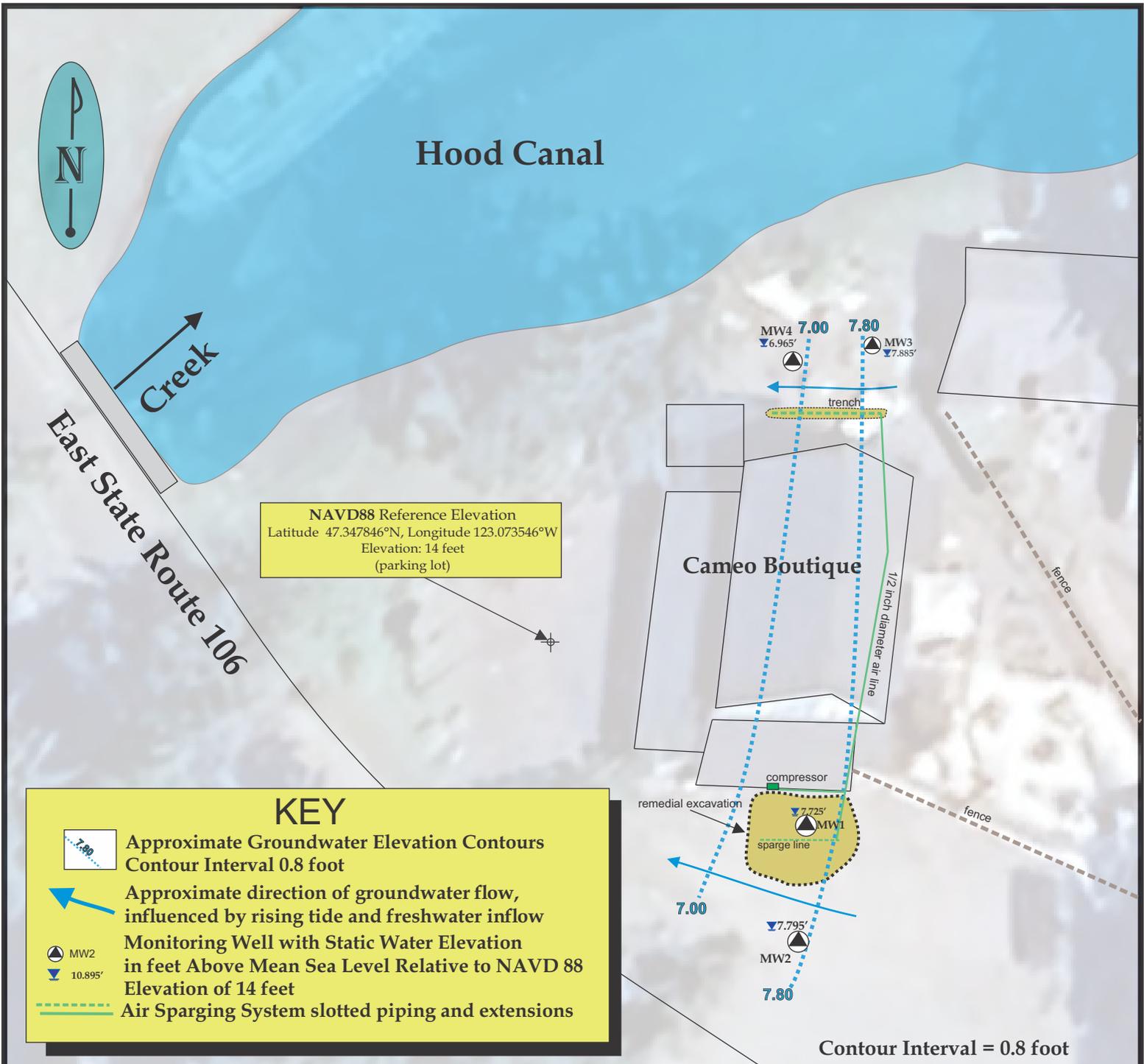
**FIGURE 4**  
**SITE PLAN SHOWING**  
**GROUNDWATER ELEVATION CONTOURS**

**First Quarter: March 31, 2025**  
**6871 East State Route 106, Union, WA**  
**Cameo Boutique**  
**Depth to Static Water Measured July 1, 2025**  
 Approximate scale 1 inch = 25 feet

NAVD88 Elevation of 14 feet above mean sea level  
 Latitude 47.347846°N, Longitude 123.073546°W



Project Number SG2024107  
**SIMPSON GEOSCIENCES**  
 Redmond, Washington



**FIGURE 5**  
**SITE PLAN SHOWING**  
**GROUNDWATER ELEVATION CONTOURS**  
**SECOND QUARTER: July 1, 2025**  
**6871 East State Route 106, Union, WA**  
**Cameo Boutique**  
**Depth to Static Water Measured July 1, 2025**  
 Approximate scale 1 inch = 25 feet

NAVD88 Elevation of 14 feet above mean sea level  
 Latitude 47.347846°N, Longitude 123.073546°W



Project Number SG2024107  
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