



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 11, 2013

Mr. Eric Koltes
Environmental Partners Inc.
295 NE Gilman Blvd
Issaquah, WA 98027

Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Investigation and Feasibility Study for the following Hazardous Waste Site:

- Name: Northwest Pipeline GP Mt Vernon C/S
- Address: 15498 Lange Road, Mount Vernon WA
- Facility/Site No.: 2684
- VCP No.: NW2008

Dear: Mr. Koltes:

Thank you for submitting documents regarding your Remedial Investigation and Feasibility Study for the Northwest Pipeline GP Mt Vernon C/S (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Arsenic, cadmium, lead, and polychlorobiphenols in soil,
- Arsenic in groundwater.

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.



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Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial action(s):

1. Remedial Investigation and Cleanup Action Plan Northwest Pipeline Mount Vernon Compressor Station, dated November 14, 2012, prepared by Environmental Partners Inc.
2. Terrestrial Ecological Evaluation Program Northwest Pipeline GP I-5 Corridor Compressor Station Facilities, dated August 16, 2011, prepared by Environmental Partners Inc.
3. Deferred AOPC Sampling Plan Mount Vernon Compressor Station, dated July 2008, prepared by Environmental Partners Inc.
4. Site Condition Summary and Sampling Plan Mount Vernon Compressor Station, dated December 2005, prepared by Environmental Partners Inc.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7239.

The Site is defined by the extent of contamination caused by the following release(s):

- Arsenic, cadmium, lead, and polychlorobiphenols in soil,
- Arsenic in groundwater.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of supporting documentation listed above, pursuant to requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site, Ecology has determined:

- Ecology concurs that the Remedial Investigation is complete with the nature and extent of all contaminants of concern clearly identified at this Site.
- Ecology concurs with the selection of cleanup standards for the chemicals of concern at this Site.
- Ecology notes your selected alternative in the Feasibility Study is Alternative 2: Targeted Excavation with Institutional Controls and Monitored Natural Attenuation of Groundwater impacts.
- Please prepare the compliance monitoring plan to be conducted during the Monitored Natural Attenuation aspect of Alternative 2.
- Please prepare the report "Environmental Covenant Check List" using the attachment to this letter as a template.

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- Once you submit the Environmental Covenant Check List, your Ecology Site manager will present your Site and your selected alternative to Ecology management for approval.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-4446.

Sincerely,



Dale Myers
Site Manager
Toxics Cleanup Program

Enclosure: Environmental Covenant Check list

Environmental Covenant Checklist

Contaminants of Concern:

- Site discovery and regulatory status (**fully describe sites cleanup history and provide a description of previous interim actions and identify if they were approved by Ecology**)
- Site and property location/definition (*define actual MTCA site location relative to property or study area*)

- Physiographic setting/topography

Provide copies of:

Vicinity Map (*preferably with topography*)

Property/Site Map (*preferably with topography*)

Legal description of property, present owner and operator

- Past site uses and facilities
- Current site use and facilities
- Proposed or potential future site uses
- Zoning
- Utilities, water supply (describe how they do or do not impact the site)
- Identify Potential sources of site contamination
- Potential sources of contamination from neighboring properties (*discuss nearby sources if known*)
- Figure – Soil investigation data points
- Figure – Surface water/groundwater investigation data points/depths
- Figure – Cross section with ground water information
- Figure- Boring/ Well logs
- Figure- Ground water elevation data
- Describe Natural Resources and Ecological Receptors

- Provide description of the contaminations proximity to surface water and groundwater based upon the investigation
- Figures – Cross sections showing soil contamination with depth
- Figures – Plan views showing soil contamination across site (*relative to releases if known*)
- Figures – Cross section showing ground water contamination with depth (*if appropriate*)
- Figures – Plan views showing ground water contamination in each aquifer
- Tables – All of the analytical data against final cleanup levels (*exceedances highlighted*)
- Figures – Plan view and vertical sections of areas meeting MTCA cleanup levels and

SELECTION AND DESCRIPTION OF CLEANUP ALTERNATIVES (Outline)

(Here is where distinct alternatives are established and described only – no comparison. Some text is useful, but the bulk of the description is best put into a table with accompanying figures.)

(MTCA requires:

- *A reasonable number and type of alternatives*
- *Alternatives that protect human health and the environment by eliminating, reducing, or otherwise controlling risks*
- *Alternatives that have the standard point of compliance for all affected media, unless they are not technically possible or are disproportionately costly for the benefit obtained.*
- *At least one permanent cleanup action alternative, unless it is not technically possible or is disproportionately costly for the benefit obtained.)*

(Ecology expectations for cleanup (WAC 173-340-370) should also be considered in formulating the alternatives, even though these expectations are not explicit evaluation criterion.)

DETAILED EVALUATION OF ALTERNATIVES (Outline)

(best put into tabular format with numerical values for weighting criteria, important to have figure showing cost versus environment benefit for disproportionate cost analysis.)

(A cleanup action must meet these minimum requirements [WAC 173-340-360(2)(a)]:

Threshold requirements

- *Protect human health and the environment*

- *Comply with cleanup standards*
- *Comply with applicable state and federal laws*
- *Provide for compliance monitoring*

Other requirements

- *Use permanent solutions to the maximum extent practicable*
- *Provide for a reasonable restoration time frame*
- *Consider public concerns*

Project-specific requirements

- *Engineering criteria established for the specific project, as appropriate)*

- **Describe Comparison with Threshold Criteria** (*Determine if alternatives meet threshold requirements. Only alternatives that meet these requirements advance to the next stage of comparison*)
- **Comparison with "Use Permanent Solutions to the Maximum Extent Practicable" (PMEP) Criterion** (*Ecology prefers permanent solutions, which are essentially those in which cleanup standards can be met without further action at the site.*)

Procedure

- A. *The alternatives are compared with the evaluation criteria listed below. The comparison may be quantitative or qualitative and require the use of best professional judgment. However, at this time Ecology's northwest regional office favors a quantitative analysis. Quantitative factors should be applied to both weighting of the evaluation criteria and to the ranking of alternatives for each criterion. The basis for the criteria weighting and the alternative rankings should be clearly explained and supported.*
- B. *The most practicable permanent alternative is the baseline against which other alternatives are compared. The results of the comparison are best displayed in a graph which shows relative environmental benefit on one axis and cost on another.*

Evaluation Criteria

(following are the required comparison criteria for the DCA. Cost is not listed since it is an obvious criterion)

Protectiveness

Permanence

Effectiveness over the long term

Management of short-term risks

Technical and administrative implementability

