



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 5, 2013

Mr. Eric Koltes
Environmental Partners Inc.
295 NE Gilman Boulevard
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 Rd, Mount Vernon WA
- **Facility/Site No.:** 2684
- **VCP No.:** NW2008
- **Cleanup Site ID No.:** 4766

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 (PCBs) 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



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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.

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

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 documents listed above are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at (425) 649-7235 or by sending an email to nwro_public_request@ecy.wa.gov.

The Site is defined by the extent of contamination caused by the following releases:

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

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.

- Ecology approves of your selected remedial action, which is described below, as likely to meet the substantive requirements of MTCA for this Site.

Alternative 2 – Targeted Excavation with Institutional Controls and MNA of Ground Water Impacts

This alternative involves the excavation and off-site disposal of all impacted soils that exceed the site-specific cleanup levels (CUL). It is currently estimated that a total of approximately 715 cubic yards of in-place soil exceed the site-specific CULs.

Remediation will consist of removal, off-site disposal, and replacement of approximately 785 cubic yards of soil, which is the volume of impacted soil plus a 10 percent contingency for additional volume based on performance sampling results.

Once remedial activities are completed a Work Plan for Monitored Natural Attenuation (MNA) will be submitted to Ecology for approval and implementation.

The general scope of Alternative 2 is:

- Preparing a Sampling and Analysis Plan and Health and Safety Plan;
- Obtaining appropriate construction permits;
- Excavation and disposal of 785 cubic yards of soil;
- Soil sampling and analysis to document soil conditions for disposal;
- Confirmation soil sampling and analysis of the sides and bottom of the excavation;
- Site restoration consisting of importing, placing and compacting clean backfill and restoring the gravel surface;
- Documentation of all remedial activities;
- Address ground water impacts through MNA;
- Implementation of institutional controls for the impacted soil above Site CULs remaining on Site.

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.

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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 about this opinion or the termination of the Agreement, please contact me by phone at (425) 649-4446 or e-mail at damy461@ecy.wa.gov.

Sincerely,



Dale Myers
Site Manager
Toxics Cleanup Program

cc: Mr. Aaron Galer, Northwest Pipeline GP / Williams Gas Pipeline
Mr. Alan Hopkins, Portnoy Environmental
Sonia Fernandez, VCP Coordinator, Ecology