STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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March 7, 2013

Mr. Aaron Galer
Northwest Pipeline GP / Williams Gas Pipeline
295 Chipeta Way #1
Salt Lake City, UT 84108

Re: No Further Action at the Following Site:

- **Site Name:** Northwest Pipeline Bellingham
- **Site Address:** Britton RD and MT Baker HWY, Bellingham WA 98226
- **Facility/Site No.:** 2906
- **VCP Project No.:** NW1749
- **Cleanup Site No.:** 42

Dear Mr. Galer:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Northwest Pipeline Bellingham facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

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

- Arsenic and elemental mercury into the Soil.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. Site Assessment and Remedial Action report, dated December 2012, prepared by Portnoy Environmental, Inc.
2. Terrestrial Ecological Evaluation Program Northwest pipeline GP Meter Station Facilities, dated April 2011, prepared by Williams Gas Pipeline, Environmental Partners Inc, and Portnoy Environmental.

Those documents 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) 649-7239.

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

Analysis of the Cleanup

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

1. **Characterization of the Site.**

   Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A.**

   A grid based sampling plan was utilized for this Site. A total of 73 surface soil samples and 36 subsurface were taken. Twenty eight samples were submitted for mercury analysis and 94 samples were submitted for arsenic analysis. This Site assessment resulted in complete vertical and horizontal delineation of soil impacts.

2. **Establishment of cleanup standards.**

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

A terrestrial ecological evaluation (TEE) approach for the TEEs is documented in NWPL GP's Terrestrial Ecological Evaluation Program Document for Northwest Pipeline GP's Meter Station Facilities throughout Washington State dated May 2011. The results of the TEEs were documented in NWPL GP's Terrestrial Ecological Evaluation Summary Report (TEE Summary Report) dated November 2011.

Using the approach above, the TEE cleanup levels for mercury documented in the TEE Summary Report that is protective of all potential terrestrial and ecological receptors for the Northwest Washington Representative Area is 2.5 mg/kg.

By extension, the MTCA Method A Cleanup Level for Unrestricted Land Uses is also considered protective of all potential ecological receptors in the Northwest Washington Representative Area and is an appropriate cleanup level for the Monroe M/S facility.

The Point of Compliance which is a Standard Point of Compliance was established as throughout the Site.

3. **Selection of cleanup action.**

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

The Selected cleanup action for this Site was excavation of all soil contaminated with mercury with off-Site disposal

4. **Cleanup.**

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

The remedial activities for arsenic-impacted soil were completed in August 2012. The remedial excavations were completed based upon the results of the site assessment sampling.

During site setup, the initial limits of the excavation were marked along with proposed depths and waste characterization. Plastic sheeting was placed along the outer edges of the excavation to prevent impacted soil from coming into contact with un-impacted soil.

Exclusion zones were established around high-pressure piping and valves to prevent potential contact with those items. The impacted soil was then excavated by hand using shovels and buckets to place the soil into a bobcat, which was then used to place the soil into a roll-off box for transportation to the landfill for disposal. Once the initial limits of the remedial excavations were completed, performance samples were collected to determine compliance with the arsenic CUL of 20 mg/kg and if any area(s) of the excavation did not comply with the CUL, the remedial excavation was expanded and re-sampled.

A total of 66.6 tons of non-hazardous soil was transported to Waste Management's Hillsboro landfill in Hillsboro, Oregon under Permit Number 105791WA for disposal.

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List.

Limitations of the Opinion

1. **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 70.105D.040(4).

2. **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 whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. **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 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW1749).

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. 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 R. Myers
Site Manager
Toxics Cleanup Program

Enclosures (1): A – Description and Diagrams of the Site

cc: Mr. Alan Hopkins, Portnoy Environmental
Mr. Eric Koltes, Environmental Partners Inc.
Dolores Mitchell, VCP Financial Manager, Ecology

Enclosure A

Description and Diagrams of the Site

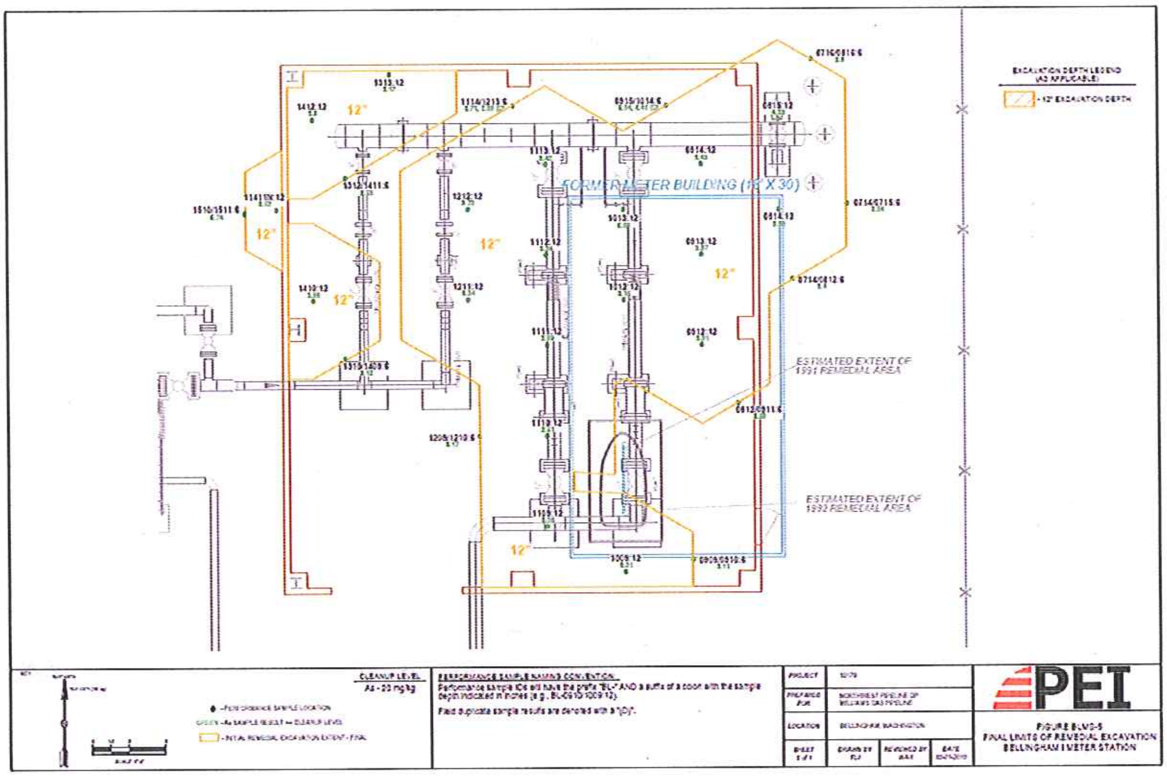
The Site is a natural gas meter station where gas is being regulated and metered to a local distribution company (LDC) or customer within a fenced enclosure. The Site formerly contained two mercury containing Orifice (A-88) manometers and one thermowell. The meters and thermowell were located above grade over a soil and gravel surface inside a metal building. The meter station is currently secured with a lock and is accessed off Britton Road outside of Bellingham, Washington.

The Site underwent site assessment activities in 1990 and site assessment and remedial activities in 1991 and 1992. The 1991 remedial action consisted of removal of seven drums of gravel and soil from under and around the meter stand to a maximum depth of 24-inches. Verification sampling results of two separate composite samples, each collected from five points within the excavation indicated a residual concentration of 2.7 and 53.0 mg/kg mercury in the remediated area. The 1992 remedial action consisted of removal of five drums of gravel and soil from areas under and around the meter stand to a maximum depth of 22-inches. Verification sampling results indicate 4.0 mg/kg mercury in a discrete sample location.

In October 2006 and January, March and April 2007, the Site underwent site assessment activities according to the Assessment SOP to assess the potential presence of mercury and arsenic in soils. Due to the uncertainty regarding the previous remedial actions, soil samples were also collected at the extents of the former remedial boundaries.

The remedial activities for arsenic-impacted soil were completed in August 2012. The remedial excavations were completed based upon the results of the site assessment sampling.
During site setup, the initial limits of the excavation were marked along with proposed depths and waste characterization. Plastic sheeting was placed along the outer edges of the excavation to prevent impacted soil from coming into contact with un-impacted soil. Exclusion zones were established around high-pressure piping and valves to prevent potential contact with those items. The impacted soil was then excavated by hand using shovels and buckets to place the soil into a bobcat, which was then used to place the soil into a roll-off box for transportation to the landfill for disposal. Once the initial limits of the remedial excavations were completed, performance samples were collected to determine compliance with the arsenic CUL of 20 mg/kg and if any area(s) of the excavation did not comply with the CUL, the remedial excavation was expanded and re-sampled.

A total of 66.6 tons of non-hazardous soil was transported to Waste Management's Hillsboro landfill in Hillsboro, Oregon under Permit Number 105791WA for disposal.



FORMER METER BUILDING
ESTIMATED EXTENT OF 1991 REMEDIAL AREA
ESTIMATED EXTENT OF 1992 REMEDIAL AREA
12"
EXCAVATION DEPTH LEGEND (AS APPLICABLE)
= 12" EXCAVATION DEPTH
CLEANUP LEVEL
As - 20 mg/kg
GREEN - As SAMPLE RESULT ≤ CLEANUP LEVEL
PERFORMANCE SAMPLE NAMING CONVENTION
Performance sample IDs will have the prefix "BL-" AND a suffix of a colon with the sample depth indicated in inches (e.g., BL-0910:1009:12).
Field duplicate sample results are denoted with a "(D)".
PROJECT
PREPARED FOR
LOCATION
SHEET
DRAWN BY
REVIEWED BY
DATE
PEI
FIGURE BLMS-5
FINAL LIMITS OF REMEDIAL EXCAVATION
BELLINGHAM I METER STATION