



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 3, 2014

Mr. Scott MacDonald
BNSF Railway Company
2454 Occidental Avenue South, Suite 1A
Seattle, WA 98134

Re: Revised Cleanup Action Work Plan for the following Site:

- **Site Name:** Michael Irrigation (aka John Michael Lease Site)
- **Site Address:** 5640 Sunset Highway, Cashmere, WA
- **Facility/Site No.:** 3154383
- **Cleanup Site No.:** 2149
- **VCP Project No.:** CE0278

Dear Mr. MacDonald:

Thank you for submitting your *Revised Cleanup Action Work Plan* for review by the Washington State Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW, which is based on an analysis of whether the work plan would meet the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA").

Our review indicates the Site is defined by the nature and extent of contamination associated with the following releases:

- Diesel-range organics, gasoline-range organics, oil-range organics, benzene, and polyaromatic hydrocarbons into soil
- Diesel-range organics, oil-range organics, benzene, and polyaromatic hydrocarbons into groundwater

A detailed diagram of the Site as currently known to Ecology is shown in Figures 2 through 5 of the *Revised Cleanup Action Work Plan*, dated December 31, 2013.

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

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1. *Revised Cleanup Action Work Plan*, TRC, December 31, 2013
2. *Groundwater Monitoring & Sampling*, TRC, 2012-2013
3. *Letter Report Regarding Cleanup Status Report*, TRC, December 27, 2012
4. *Cleanup Action Work Plan*, Farallon Consulting, August 19, 2010
5. *Subsurface Investigation Report*, Farallon Consulting, March 3, 2009.
6. *Limited Phase II Assessment Report*, EMR Inc., January 12, 2005.
7. Correspondence file, Michael Irrigation Site, CRO.

Those documents are kept in the Central Regional Office (CRO) of Ecology for review by appointment only. You can make an appointment by calling the CRO public records coordinator at 509-454-7658.

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

Ecology concludes that the *Revised Cleanup Action Work Plan* if implemented, would clean up a good portion of the contamination. We encourage implementation of the cleanup action, which includes soil excavation on the southwest side of the rail line as depicted in Figure 3 of the *Revised Cleanup Action Work Plan*, December 31, 2013

Confirmational sampling following remedial measures is required to demonstrate compliance with groundwater and soil cleanup levels. Consequently, soil confirmational sampling will occur as described in Section 5.2 of the *Revised Cleanup Action Work Plan*. Groundwater throughout the Site will be monitored for contaminants to determine the effectiveness of the soil removal actions in mitigating the soil leaching to groundwater pathway.

Additionally, monitored natural attenuation will be evaluated as a likely cleanup action consistent with Section 4.3 and Section 5.3.8 of the *Revised Cleanup Action Work Plan*. Please note that **groundwater confirmational monitoring is required to be, at minimum, 4 quarters below cleanup levels following contaminated soil removal.**

Ecology notes also that no action is planned at this time for the soils on the northeast side of the rail line that is adjacent to the Wenatchee River. However, groundwater monitoring will continue to be conducted at the appropriate points within the well network to assess whether contaminated soils within the smear zone may pose a threat to surface waters.

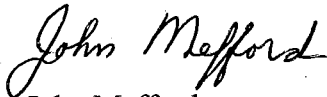
Soil contamination still present above cleanup levels will require an institutional control to include environmental covenants to mitigate the direct contact exposure route and/or account for future land use.

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Thank you for choosing to clean up your Site under the Voluntary Cleanup Program (VCP). As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

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, please contact me by phone at 509-454-7836 or e-mail at john.mefford@ecy.wa.gov.

Sincerely,



John Mefford
Site Manager
CRO Toxics Cleanup Program

cc: Keith Woodburne, TRC