



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

May 19, 2014

Ms. Ann Macdonald  
Coca-Cola Refreshments USA Inc.  
1551 Atlantic Street  
Union City, CA 94587

**Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site :**

- **Site Name:** Coca Cola Bottling Co. of Washington - Bellingham
- **Site Address:** 2101 Woburn Street, Bellingham, Washington
- **Facility/Site No.:** 64254993
- **Cleanup Site ID No.:** 6428
- **VCP Project No.:** NW2661

Dear Ms. Macdonald:

Thank you for submitting the work plan for a supplemental off-Property contamination assessment regarding your remedial actions at the Coca Cola Bottling Co. of Washington Bellingham facility (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 the submitted plan pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following releases at the Site:

- Total petroleum hydrocarbons – gasoline and diesel range organics (TPH-GRO and TPH-DRO) in soil and ground water.

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.



Ann Macdonald  
May 19, 2014  
Page 2

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

1. Cardno ATC, February 20, 2014, Work Plan for the Assessment of Off-Property Impacts, Groundwater Well Installation and Monitoring Program.

The supplemental off-Property contamination assessment work plan 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 425.649.7235, or sending an email to [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

Between 1990 and 2012, multiple cleanup efforts were conducted at this Site, which included characterizing contamination in soil and ground water, removal of contamination sources (underground storage tanks and impacted soils), and monitoring of the ground water. However, these cleanup actions were determined to be incomplete due to a data gap remaining at the western Site boundary along Valencia Street, based on Ecology's review of the remedial action report dated November 15, 2012. The data gap consists of the contamination status of ground water and soil in the western portion of the Site and beyond the Site boundary adjacent to Valencia Street.

Therefore, it is necessary to perform an additional investigation for fulfilling the data gap. The purpose of the off-Property assessment is to identify the contamination status and further characterize the contamination in soil and ground water in the off-Property area.

Based on a review of the work plan 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 releases at the Site, Ecology approves the work plan. The following requirements must be performed before Ecology issues a No Further Action (NFA) letter for this Site:

- Concentrations of the contaminants in the soil and ground water must not exceed MTCA Method A cleanup levels. Or, the impacted soil and/or ground water exceeded must be remediated, followed up with confirmative data which indicate completion of the cleanup for the exceeded soil and/or ground water in the off-Property area.
- In addition to sampling the new monitoring wells, ground water samples should be collected from all the existing monitoring wells at this Site and analyzed for the chemicals of concern (COCs).
- In order for the Site to be considered for an NFA determination, ground water analytical results for the COCs must demonstrate concentrations below MTCA Method A cleanup

Ann Macdonald  
May 19, 2014  
Page 3

levels for a minimum of four consecutive quarterly sampling rounds.

**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.**

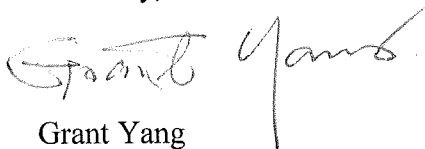
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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 a NFA under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-7126, or [gyan461@ecy.wa.gov](mailto:gyan461@ecy.wa.gov).

Sincerely,



Grant Yang  
Site Manager  
NWRO Toxics Cleanup Program

cc: Simon Payne, Cardno ATC  
Sonia Fernandez, VCP Coordinator, Ecology