



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

July 7, 2014

Mr. Norman Cira
MWH Americas, Inc
5021 Pine Road
Cedarburg, WI 53012

Re: *Draft Work Plan, Quarterly Groundwater Monitoring* for the following Site:

- Name: GE Aviation LLC
- Address: 2720 W. Washington Ave, Yakima
- Facility Site No.: 13175868
- Cleanup Site No.: 4662
- VCP No.: CE0374

Dear Mr. Cira:

Thank you for submitting your *Draft Work Plan, Quarterly Groundwater Monitoring* 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). We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW, which is based on our 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").

Issues Presented and Opinions

1. Is the proposed work plan sufficient to characterize site contamination associated with the releases detected in the vicinity of the UST?

NO. Ecology has determined that additional soil and groundwater analyses are required to fully characterize releases detected in the vicinity of the UST.

2. Upon completion of the proposed work plan, will further remedial action likely be necessary elsewhere at the Site?

YES. Ecology has determined that further remedial action will likely be necessary elsewhere at the Site.



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:

- Gasoline-range, diesel-range and heavy-oil range organics into the soil.
- Metals and methylene chloride into the soil.
- Diesel-range organics in groundwater.

Detailed diagrams of the Site as currently known to Ecology are shown in Figure 2 (Site Plan and Sample Locations), *Former Underground Storage Tank Investigation Report* and in Figure 3 (Former UST Sample Results & August 2011 Groundwater Contour) as an attachment to an email to Ecology site manager, Norm Hepner, dated June 12, 2012.

Basis for the Opinion

This opinion and analysis was based on the information contained in the following documents:

1. *Groundwater Monitoring Report, 1st Quarter 2014, GE Aviation – Yakima, WA*, MWH Americas, Inc., April 2014.
2. *Draft Work Plan, Quarterly Groundwater Monitoring*, MWH Americas, Inc, January 23, 2014 (4 page letter).
3. *Former Underground Storage Tank Investigation Report*, MWH Americas, Inc., May 2013.
4. *Phase II Environmental Site Assessment: GE Aviation- Yakima, WA*, MWH Americas, Inc, May 2013.
5. *Site Assessment Engineering Report, Underground Storage Tank Removal*,” PLSA Engineering & Surveying, February 2008.
6. Associated correspondence and email, GE Aviation, 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.

Analysis of the Opinion

This opinion applies only to the UST portion of the site characterization and does not address the issue of metals and methylene chloride at another portion of the Site.

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Ecology concludes that the *Draft Work Plan, Quarterly Groundwater Monitoring* has a number of deficiencies regarding site characterization:

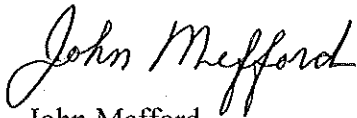
- In the 2007 UST site assessment report, a soil sample obtained at approximately 9 feet below ground surface (bgs) exhibited a gasoline-range organics concentration of 6,226.5 mg/kg. This value exceeds both the MTCA Method A soil cleanup level and the residual saturation value of 1,000 mg/kg for weathered gasoline.
- Given these conditions and since groundwater was encountered throughout the excavation at depths ranging from approximately 8 to 9.5 feet bgs, analysis for gasoline range organics in groundwater should be performed.

Ecology has determined that the *Draft Work Plan, Quarterly Groundwater Monitoring* does not have a sufficient suite of analyses to properly evaluate the soil and groundwater for contaminants that were initially detected in the 2007 UST decommissioning.

Please note that groundwater confirmational monitoring is required to be, at minimum, 4 quarters below applicable MTCA Method A or Method B cleanup levels to be in compliance.

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: Dolores Mitchell, VCP Financial Manager