STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

October 27, 2010

Gary Panther
URS Corporation
920 N. Argonne Rd. Ste 300
Spokane Valley, WA 99212

Re: No Further Action at the following Site:

- **Site Name:** Tri City Battery Goodyear
- **Site Address:** 601 George Washington Way, Richland
- **Facility/Site No.:** 43737443
- **VCP Project No.:** CE0292

Dear Mr. Panther:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Tri City Battery Goodyear 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 release:

- PCBs, PAHs, Metals, Diesel Range Organics and heavy oil, Gasoline Range Organics into the Soil
- PCBs, PAHs, Metals, Diesel Range Organics and heavy oil into the Ground Water

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. LFR Inc, Site Characterization Report, November 20, 2008.
2. Groundwater monitoring reports, URS Corp, March 2009 through February 2010.
3. URS Corp, letter and project summary, May 5, 2009.
4. Contents of file, CRO central files.

Those documents are kept in the Central Regional Office of Ecology (CRO) for review by appointment only. You can make an appointment by calling Roger Johnson 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 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.**

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.

SOIL:
PCBs – Method A Cleanup Level for unrestricted land use = 1 mg/kg
Metals – Method A Cleanup Level for unrestricted land use; Lead = 250 mg/kg, Mercury = 2 mg/kg, Cadmium = 2 mg/kg, Chromium VI = 19 mg/kg, Chromium III = 2000 mg/kg, Arsenic = 20 mg/kg
Diesel range organics and heavy oil – Method A Cleanup Level for unrestricted land use = 2,000 mg/kg
PAHs – Method A Cleanup Level for unrestricted land use = 0.1 mg/kg

The standard points of compliance for MTCA Method A soil cleanup levels for unrestricted land use are applicable to this cleanup action. The point of compliance for each of the contaminants is throughout the site to a depth of 15 ft. below ground surface [173-340-740(6)].

GROUNDWATER:
PCBs – Method A Cleanup Level for groundwater = 0.1 ug/liter
PAHs – Method A Cleanup Level for groundwater = 0.1 ug/liter
Diesel range organics and heavy oil – Method A Cleanup Level for groundwater = 500 ug/liter

The standard points of compliance for MTCA Method A groundwater cleanup levels are applicable to this cleanup action. The point of compliance for each of the contaminants is throughout the site, from the upper level of the saturated zone to the lowest depth potentially affected [173-340-720(8)(b)].

3. Selection of cleanup action.

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

Contaminated soil was excavated to a vertical depth below the standard point of compliance for soil and to the maximum horizontal and vertical extent possible given site conditions. Approximately 267 tons of excavated soils were disposed at Finley Buttes Landfill via Basin Disposal's transfer station. Waste soils did not designate as Dangerous Waste. Drilling and sampling spoils were disposed at Emerald Recycling as non-

hazardous waste. Three groundwater monitoring wells were installed to a depth of 45 – 48 feet. Analytical results from one up-gradient and two down-gradient groundwater monitoring wells indicated all COCs were either non-detectable, or present at concentrations below the applicable MTCA Method A cleanup levels for groundwater for four consecutive quarters of monitoring.

The cleanup action selected meets the minimum requirements in WAC 173-340-360(2), is protective of human health and the environment, and complies with MTCA cleanup standards.

4. Cleanup.

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

Contaminated soil was excavated and removed from the former location of a drywell on the site. The excavation was completed to an approximate depth of 26 feet below ground surface and to a lateral dimension of approximately 25 feet in circumference. Contaminated soil was removed to below the standard point of compliance of 15 feet for soil. Some residual contamination was left in place between 16 and 26 feet because the proximity of adjacent buildings made it unsafe to enlarge the excavation. Groundwater was not encountered during excavation.

In-situ soil sampling of the excavation pit indicated that contaminants left in place include HRO (2,170 mg/kg), cPAHs (0.1714 mg/kg with a Toxic Equivalency Factor of 0.057028), and PCBs (1.99 and 2.0 mg/kg). Five soil borings were conducted in the vicinity of the drywell location to depths ranging from 45 to 48 feet. No COCs were detected above the laboratory MRLs for the 25 soil samples obtained from the borings, indicating that the residual contaminants are localized at the source beneath the former drywell.

Three groundwater monitoring wells were constructed, one up-gradient and two down-gradient from the drywell excavation. Analytical results for four consecutive quarters of monitoring indicated all COCs were either non-detectable, or present at concentrations below the applicable MTCA Method A cleanup levels for groundwater.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List
- Confirmed and Suspected Contaminated Sites List

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

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 (VCP #CE0292).

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 509-454-7836 or e-mail at mdun461@ecy.wa.gov.

Sincerely,

Mark Dunbar
CRO Toxics Cleanup Program

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

cc: Joan Peterson, Inland Commercial Properties, LLC.
Gary Panther / Jeff Leppo, URS Corporation, Inc.
Dolores Mitchell, VCP Financial Manager

Enclosure A

Description and Diagrams of the Site

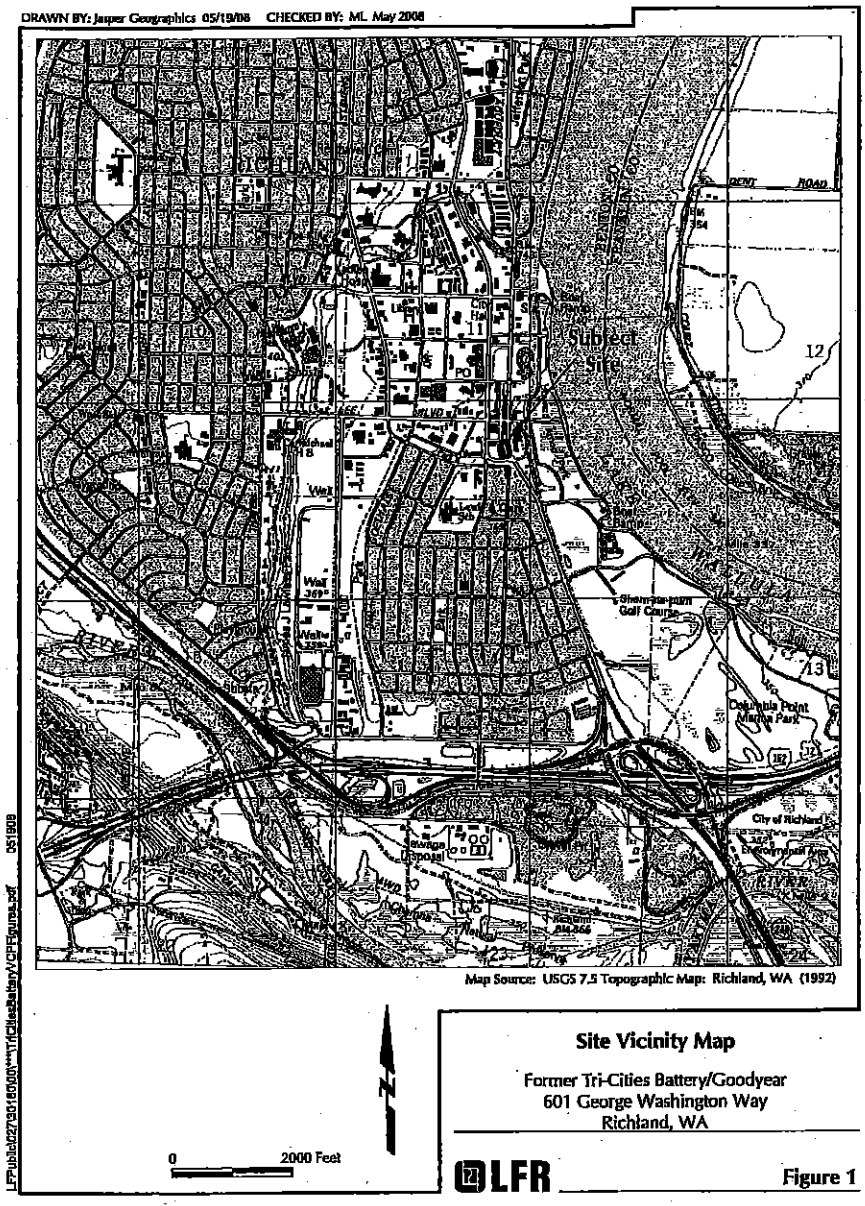
Site Description

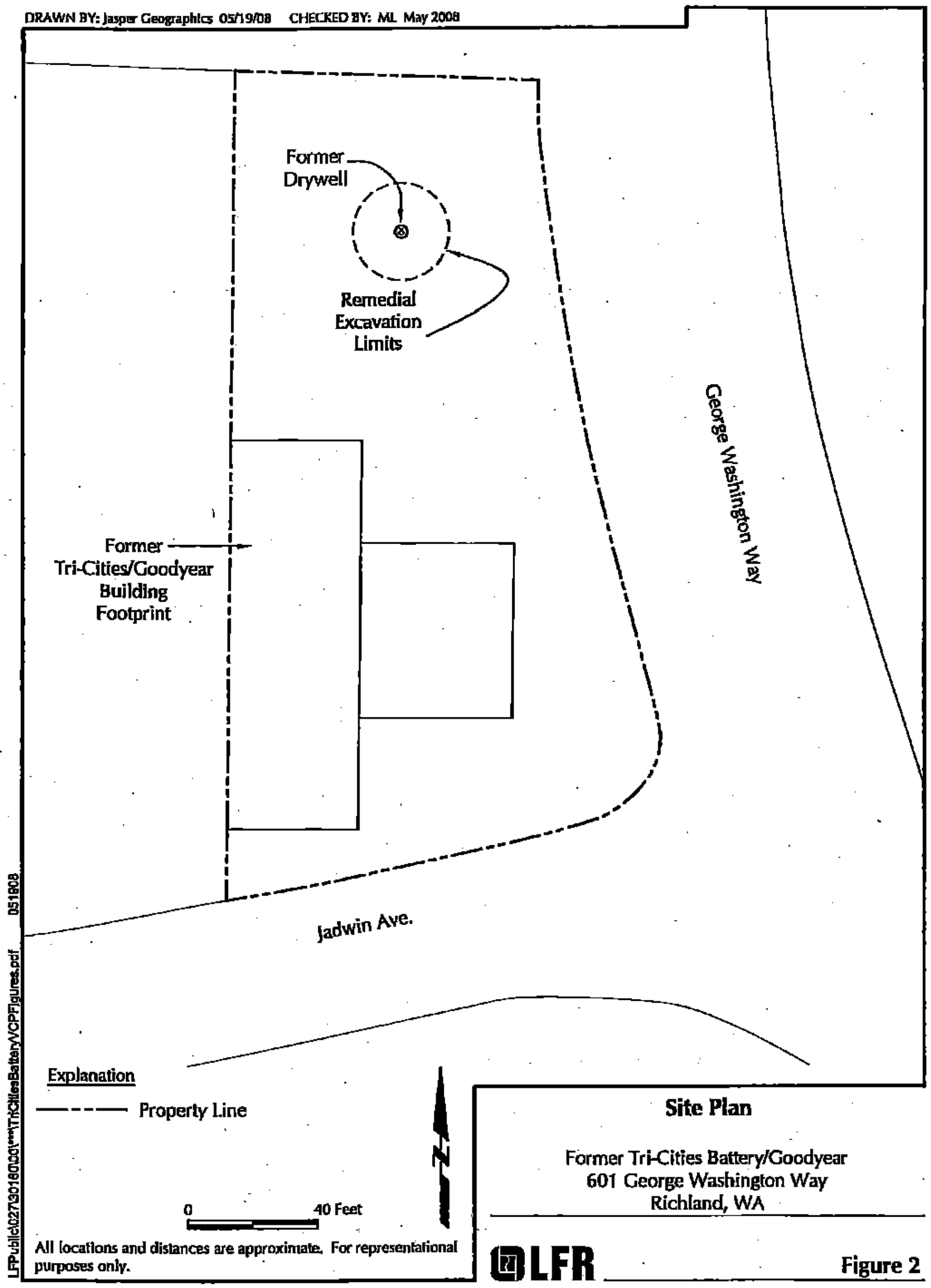
The site is located within SW1/4 SE1/4 of Section 11, T9N, R28E, at 601 George Washington Way, Richland. The site includes Benton County parcel numbers 111983020558010 and 111983020558015. The original building, which has since been demolished, housed an automotive service shop which was constructed in the late-1960s. The site was the former location of Tri City Battery/Goodyear and similar automotive service businesses. The service shop had a concrete floor and included six vehicle lifts and a sump, which were sampled and removed prior to demolition of the building. The asphalt parking lot, which was located in the northern portion of the site, contained a drywell for stormwater drainage. The former drywell is the source of contamination at the site.

The drywell was sampled and analytical results indicated PAHs, PCBs, Diesel Range Organics and Heavy Oils, and metals present in soil. Subsequent excavation and soil sampling indicated that residual contaminated soil is located below the former location of the drywell. The depth of the original drywell is reported to have been 16 feet. The results of sampling indicate soil contamination is limited to an area below the former drywell to an estimated depth of approximately 30 feet below ground surface, with a lateral extent at this depth of up to approximately 20 to 25 feet in circumference.

Following the remedial excavation, three groundwater monitoring wells were constructed, one up-gradient and two down-gradient from the location of the drywell excavation. Analytical results of groundwater monitoring indicated all COCs were either non-detectable or present at concentrations below the applicable MTCA Method A cleanup levels for groundwater for four consecutive quarters of monitoring.

Site Diagrams




DRAWN BY: Jasper Geographics 05/19/08 CHECKED BY: ML May 2008
Former Drywell
Remedial Excavation Limits
Former Tri-Cities/Goodyear Building Footprint
George Washington Way
Jadwin Ave.
Explanation
Property Line
0
40 Feet
N
All locations and distances are approximate. For representational purposes only.
Site Plan
Former Tri-Cities Battery/Goodyear
601 George Washington Way
Richland, WA
LFR
Figure 2