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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

CERTIFIED MAIL

February 28, 2006

Ms. Sandi Thompson
Mason County Transportation Cooperative
700 S. First St.
Shelton, WA 98584

Re: VCP application dated May 14, 2004:

- Mason County Transportation Cooperative
- Address: 3740 North Shelton Springs Road, Shelton, WA 98584
- Facility/Site No.: 23634752
- VCP No.: SW 0579

Dear Ms. Thompson:

Thank you for submitting your independent remedial action report for the Mason County Transportation Cooperative facility (Site) for review by the State of Washington 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 whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. 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.



Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Status Report for Mason County Transportation Cooperative LUST Site, dated October 26, 1994 by PBS Environmental
2. Project files including the VCP application dated May 14, 2004.

The documents listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact at 360-407-6365.

The Site is described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site are not sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing any of the contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at the Site under MTCA.

The following are Ecology's comments pertaining to reviewed material:

1. The Site has not been defined as required by WAC 173-340-350 – MTCA Cleanup Regulation Amended February 12, 2001. This chapter requires "characterization of areal and vertical distribution and concentrations of hazardous substances". Please furnish General facility information (legal description of facility location, dimensions of facility, present owner and operator, list of past owners and operators, operational history), Site condition map (boundaries, topography, structures, utilities, wells), Filed investigation Workplans (surface water and sediments floodplains, sampling to show distribution of hazardous substances, soils geology and ground water system characteristics, bedrock, and unconsolidated material, groundwater flow rate and gradient, groundwater divides, groundwater recharge and discharge, public and private wells groundwater quality data, air, land use, zoning, natural resources and ecological receptors, hazardous substance sources, regulatory classifications).
2. Please demonstrate compliance with the February 12, 2001 Amended 2001 MTCA standards particularly with Table 830-1. Please update Ecology on the status of characterization and cleanup of the site. A chronological list of events is required, identifying the characterization and cleanup efforts. Show the areas still contaminated

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and indicate the concentrations of pollutants. Please clearly indicate the two media affected, soil and groundwater, how they are impacted and what is the status of their cleanup.

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.

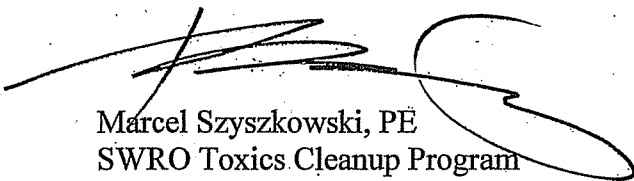
All sampling data shall be submitted to Ecology according to the requirements of WAC 173-340-840(5), in printed form and in electronic form capable of being transferred into the Department's data management system. Electronic data submittal requirements are provided at <http://www.ecy.wa.gov/eim/>.

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 additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or performed at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 360-407-6363.

Sincerely,



Marcel Szyszkowski, PE
SWRO Toxics Cleanup Program

MS/ksc:Opinion Mason Coop 022306

Enclosure

CC: Colin Polk, PBS Environmental
Bob Warren, Ecology
Chuck Cline, Ecology
Trish Akana, Ecology (SW0579)

ENCLOSURE A

The address of the site is 3740 North Shelton Springs Road, Shelton, WA 98584, Mason County. The following elements are missing from site description: general facility information (legal description of facility location, dimensions of facility, present owner and operator, list of past owners and operators, operational history), Site condition map (boundaries, topography, structures, utilities, wells), filed investigation (surface water and sediments floodplains, sampling to show distribution of hazardous substances, soils geology and ground water system characteristics, bedrock, and unconsolidated material, groundwater flow rate and gradient, groundwater divides, groundwater recharge and discharge, public and private wells groundwater quality data, air, land use, zoning, natural resources and ecological receptors, hazardous substance sources, regulatory classifications), workplans.

In June 1994, PBS Environmental advanced a soil boring on the north side of the underground storage tank nest at the Mason County Transportation Cooperative fueling station prior to removal and replacement of the tanks. The tanks removed in August 1994 were two 3,000 gallon gasoline tanks and one 12,000 gallon diesel tank. A groundwater sample from the boring was tested for Total Petroleum Hydrocarbons and was found to contain 820 ppm diesel fuel and 17 ppm gasoline. In September 1994 the three underground storage tanks were removed and replaced with two double walled fiberglass tanks. Approximately between 600 and 1,000 cubic yards of diesel contaminated soil was removed for aeration. Diesel-contaminated soil was left in place beneath the pump island and to the north of the excavation towards the maintenance and office building. It was determined that the leak was the result of a loose fitting on the fill pipe for the 12,000 gallon diesel tank. No explanation was provided for gasoline contamination in the groundwater.

On December 11, 2003 Department of Ecology issued a letter to the applicant identifying the site conditions and missing characterization elements as follows: Uncharacterized diesel contamination remains in the soils, no evidence of proper disposition of the excavated, contaminated soil, lack of groundwater characterization.

There is indication that uncharacterized petroleum contamination, diesel and gasoline, exists in the soil and groundwater. Ecology was not provided any information regarding sampling done at the site and the cleanup conducted except for a statement contained in the PBS Proposal for Conducting Remedial Action/Feasibility Study dated October 27, 1994. The vertical and horizontal extent of the contamination has not been identified in both soil and groundwater, but the groundwater sample taken from one boring at the north side of the tank nest contained 820 ppm of diesel and 17 ppm of gasoline. It is not clear how many soil and groundwater samples were taken and what was their location. It is not clear how many wells were put in place and how many borings were advanced on the site.

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Between 600 and 1,000 cubic yards of soil was excavated during the tank replacement activities in 1994. The supplied information does not indicate which part(s) of the site were investigated and remediated except for a statement contained in the PBS Proposal for Conducting Remedial Action/Feasibility Study dated October 27, 1994. This statement indicates that one boring was advanced in the north side of the tank nest. The applicant plans to continue with the cleanup activities.

SOIL SAMPLE RESULTS

SAMPLE	DEPTH (Feet)	TPH-D RESULTS
*X-1	11	10,300 ppm
*X-2	10	ND (HCl-D)
*X-3	10	ND (HCl-D)
*X-4	15	12,400 ppm
*X-7	16.5	42 ppm
*X-9	10	9,110 ppm
*X-11	10	5,540 ppm
*X-13	15	120 ppm
*X-14	15	900 ppm
*X-15	10.5	1,400 ppm
*X-16	10.5	5,000 ppm
*TP-1	14	ND (HCl-D)
*TP-2	14	ND (HCl-D)
*PD-E-1	2	21,000 ppm
*PL-D-1	2	ND (HCl-D)
*PL-G-1	2	ND (HCl-D)

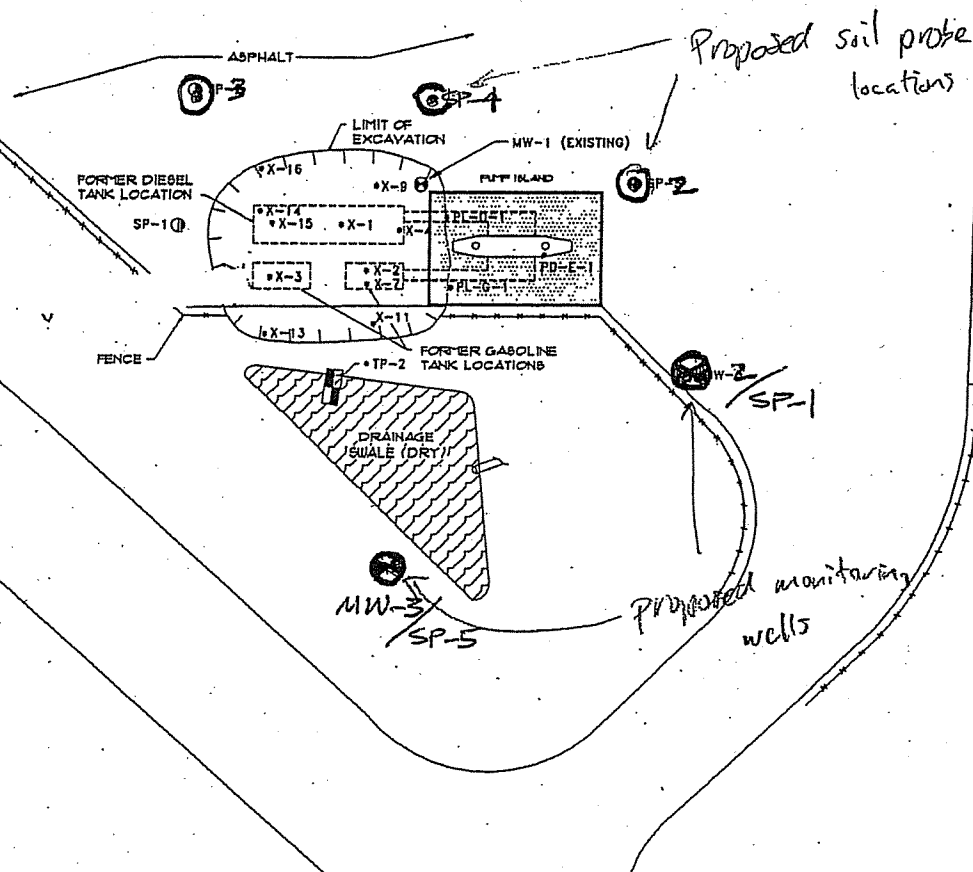
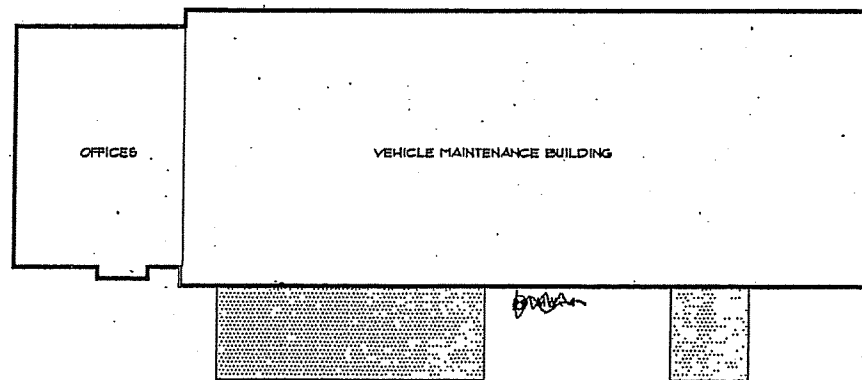
LEGEND

- ⊕ GROUNDWATER MONITORING WELL LOCATION
(PROPOSED, UNLESS NOTED OTHERWISE)
- ⊙ PROPOSED SOIL PROBE LOCATION



BUS FUELING STATION

SCALE 1" = 30'-0"



56
56

P
EST 118

1220
PORTL

503

PROPOSED WELL & SOIL PROBE LOCATION PLAN

SECTION

360