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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

**CERTIFIED MAIL**

September 7, 2006

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

**Re: Further Action Determination under WAC 173-340-515(5) for the following  
Hazardous Waste Site:**

- Name: 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 **Focused Site Investigation Work Plan, dated August 23, 2006** 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. Focused Site Investigation Work Plan, dated August 23, 2006 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. Page 3, third paragraph, starting with "Two test pits...": Reference is being made to TP-1 and TP-2. TP-2 is located on Figure 2 in place of TP-1, and vice versa. Please clarify and provide an approximate scale on Figure 1 and Figure 2.
2. Page 3, last paragraph refers to Ecology's statement contained in February 28, 2006 Opinion Letter as having been made in error. No such statement regarding the definition of the extent of soil contamination has been made by Ecology. Ecology has never stated that soil contamination has been characterized in any of the location around the site.
3. Page 6, Laboratory Analysis: testing for the contamination must be in compliance with the existing regulations, WAC 173-340-900. Please refer to Table 830-1, which lists all required testing for petroleum releases.
4. Ecology suggests sampling of the soil and groundwater for the suspected contamination at all proposed and at the following points (please refer to your Figure 2): Point A - located halfway between TB-1 and TB-6; Point B - located halfway between TB-6 and TP-2; Point C - located halfway between TP-2 and TB-5.

Ms. Sandi Thompson  
September 7, 2006  
Page 3

5. Please elaborate on the potential releases on the whole property. For example, it seems that there is a significant risk of releases at the Vehicle Maintenance Building. Is there a Vehicle Wash station located at the Facility? Any Oil/Water separators?
6. I would like to come to the site and evaluate its condition. Please propose two or three dates when I could meet you or your consultant 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.

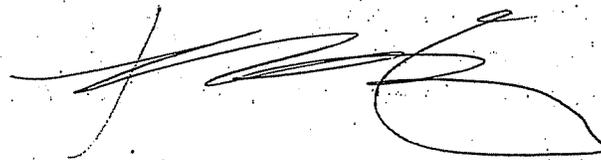
All sampling data shall be submitted to Ecology according to the requirements of WAC 173-340-840(5), in printed form and in electronic form capable of being transferred into the Department's data management system. Electronic data submittal requirements are provided at <http://www.ecy.wa.gov/eim/>.

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 083006

Enclosure

cc: Ulysses Cooley, PBS Environmental  
Bob Warren, Ecology  
Chuck Cline, Ecology

## 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.

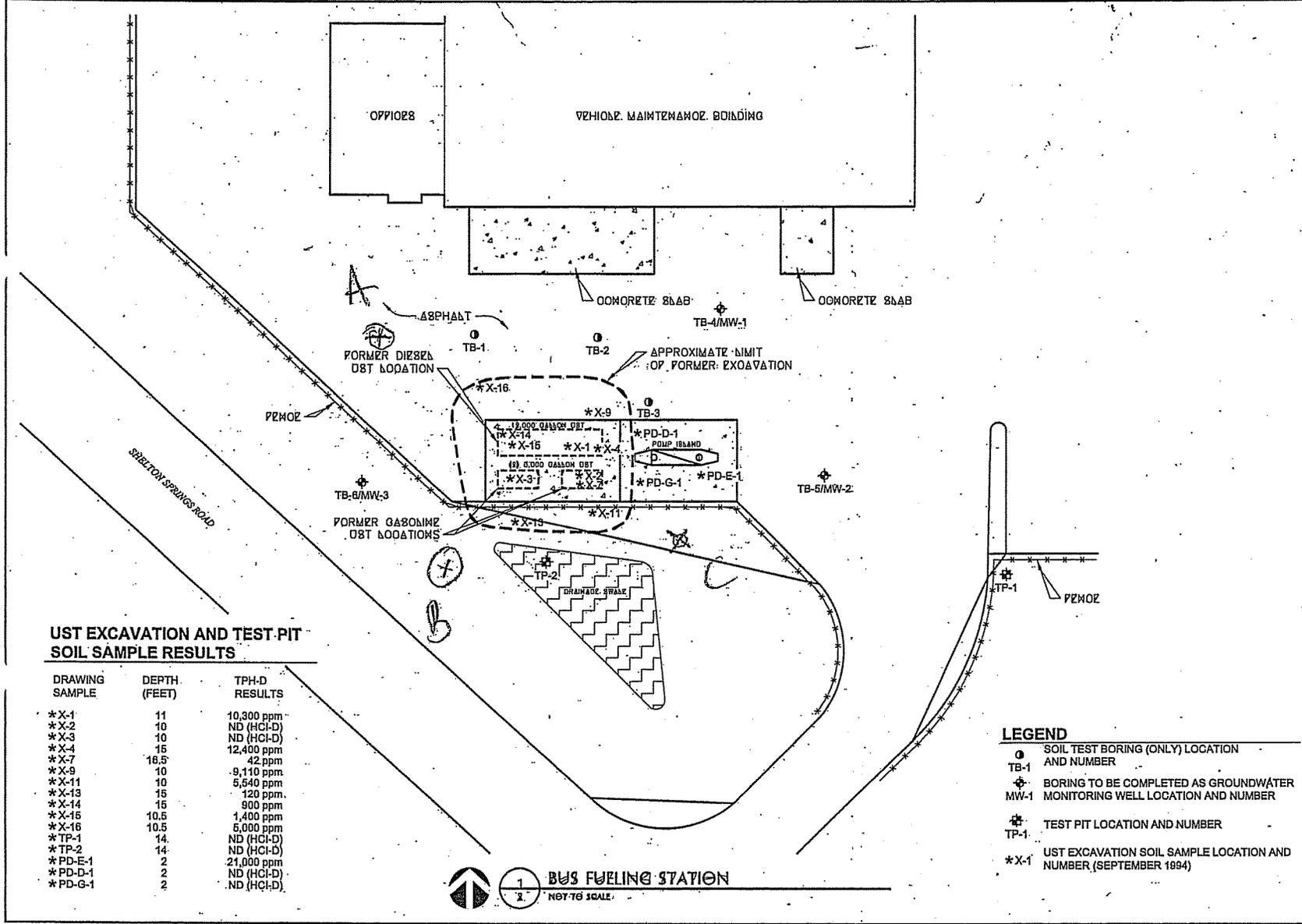
There is indication that uncharacterized petroleum contamination, diesel and gasoline, exists in the soil and groundwater. Ecology was not provided any information regarding sampling done at the site and the cleanup conducted except for a statement contained in the PBS Proposal for Conducting Remedial 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.

Ms. Sandi Thompson  
September 7, 2006  
Page 5

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.

PROPOSED SAMPLE LOCATION PLAN  
 MASON COUNTY TRANSPORTATION COOPERATIVE  
 SHELTON, WASHINGTON

SAMPLE LOCATION PLAN	
Project #: 18039.000	FIGURE 2
Date: AUGUST 2006	



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