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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

15 West Yakima, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

May 30, 2000

Mr. Lynne Koehler
The Boat Shop
1238 Columbia Drive SE
Richland, WA 98352

RE: Voluntary Cleanup Review, The Boat Shop, 1238 Columbia Drive, Richland

Dear Mr. Koehler

Thank you for submitting your LUST Closure/Interim Cleanup Report, The Boat Shop in Richland for State of Washington, Department of Ecology's (Ecology) review. Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Boat Shop located at 1238 Columbia Drive SE in Richland:

1. LUST Closure/Interim Cleanup Report, The Boat Shop, WSDOE Site #009266, Richland, WA; by White Shield Inc., dated June 1994
2. Materials and correspondence from the Department of Ecology Files for The Boat Shop facility, Richland. Files maintained at the Central Regional Office of the Department of Ecology.

Based upon the above listed information Ecology has determined that further site characterization work is needed to determine if The Boat Shop facility meets the MTCA cleanup standards.

The LUST Closure/Interim Action Report provides laboratory test data that shows a release of gasoline range petroleum products to the soil and contact with groundwater. The conclusion expressed in the report are correct in the recommendation of installation of monitoring wells according to WAC 173-340-450(3)(iii) to determine if the groundwater is currently impacted by the release of gasoline associated with the underground storage tanks that have been removed from the facility.

The report does not provide sufficient information to determine if all petroleum contaminated soil was removed from the excavation. Soil samples from the bottom of the excavation with identification numbers RHS-1094-301 and RHS-1094-302 show contamination levels of 6300 mg/kg and 66 mg/kg respectively. From the information presented in table I, table II, and the site sketch it is not clear how much distance separate the locations of these two samples and whether sample RHS-1094-301 was taken at a depth of 8 or 9 feet below ground surface. Additionally, the second excavation of soil from the tank basin, on or before June 3, 1994, is not



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adequately characterized for where the excavated materials were removed and for any potential lateral spread of contamination across the surface of the groundwater.

Installation of at least three monitoring wells is recommended. Three monitoring wells are the minimum number of wells needed to characterize the direction that groundwater moves through the soil. Well construction requirements are defined in WAC 173-160, and the screened interval where water enters the well should extend above and below the surface of the groundwater at all times. Considering that this site is located in the close proximity of the Columbia River, Lake Wallula, a sampling plan for groundwater should consider the potential effect of changing elevations of the lake surface.

Sampling of monitoring wells should begin with samples collected from each once a quarter for the first year. At the end of the first year of samples the information can be evaluated to determine adjustments or abandonment of the sampling program. In addition to collecting samples to be tested for gasoline range hydrocarbons, Benzene, Ethylbenzene, total xylenes, and toluene, information including the elevation of groundwater in the wells needs to be recorded for the characterization of groundwater flow direction.

Please note that because your actions were not, or will not be conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(I) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

The opinions presented by Ecology in this letter are made only with respect to the information provided in the reports and documents listed above. This opinion is only applicable to the specified site (or portion of the site) and may not be used to justify action at any other site (or portion of the site) nor any other properties owned or operated by Lynne Koehler or the City of Richland.

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 determination.

Please contact me at (509) 454-7840 if you have any questions or would like clarification of any portion of the letter.

Sincerely,



Mark Peterschmidt
VCP Coordinator, CRO
Toxics Cleanup Program

cc: Wyn Birkenthal, Parks & Recreation Director