



FILE COPY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

March 22, 2000

Ms. Donna Parkes
Shannon & Wilson, Inc.
303 Wellsian Way
Richland, WA 99352

Dear Ms. Parkes:

RE: No Further Action Determination for the Underground Storage Tank
Decommissioning and Assessment of the Emergency Generator Fuel Tank,
Federal Building, Richland, Washington

Thank you for submitting the results of your independent remedial actions for review by the State of Washington Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Richland Federal Building emergency generator fuel tank located on the west side of the Federal Building at 825 Jadwin in Richland:

1. Underground Storage Tank Site Assessment, Federal Building, Richland, Washington, by Shannon & Wilson, Inc., August 1998.
2. Preliminary Phase 2 Environmental Site Assessment, Closed UST at Federal Building, Richland, Washington, by Shannon & Wilson, Inc., October 1998.
3. Supplemental Phase 2 Environmental Site Assessment, Closed Underground Storage Tank, Federal Building, Richland, Washington, by Shannon & Wilson, Inc., March 1999.
4. Petroleum Risk Assessment, Closed UST at Federal Building, Richland, Washington, by Shannon & Wilson, Inc., May 1999.
5. Correspondence and other related materials contained in the Ecology site file for the Richland Federal Building/U S Post Office.

The above listed reports will be kept in the Central Files of the Central Regional Office (CRO) of Ecology for review by appointment only. Appointments can be made by calling the CRO resource contact at (509) 454-7658.

Based upon the above listed information Ecology has determined that, at this time, the release of petroleum related contaminants into the soil and groundwater does not pose a threat to human health or the environment.



Ms. Donna Parkes
March 22, 2000
Page 2

Therefore, Ecology is issuing this determination that no further remedial action is necessary at this site under MTCA, chapter 70.105D RCW. However, please note that because your actions were not conducted under a consent decree with Ecology, this letter is not a settlement by the state under RCW 70.105D.040(4).

Ecology's No Further Action determination is made only with respect to the releases from the former emergency generator fuel tank, volume 1000 gallons, at the Richland Federal Building identified in the Underground Storage Tank Site Assessment report dated August 1998. This No Further Action determination applies only to the area of the property affected by the release identified in the report at the west side of the Federal Building, 825 Jadwin in Richland. This No Further Action determination does not apply to any other release or potential release at the property, any other areas on the property, nor any other properties owned or operated by General Services Administration or the United States Post Office.

Potential releases of solvents from the former underground storage tanks identified as having been located on the east side of the Federal Building are excluded from the No Further Action determination. At this time insufficient environmental data exists to determine if the operation of the three solvent storage tanks has or has not contributed to the solvent contamination documented in groundwater samples from the on-site monitoring wells. Additional information is needed to determine quantity and source of solvent contamination that may be migrating onto the facility in the groundwater. The Petroleum Risk Assessment provided by Shannon and Wilson, Inc. does not supply sufficient information on potential migration from off-site sources and on-site groundwater conditions. Additional information needed includes hydraulic conductivity, flow velocity, quantification of soil conditions that influence the fate and transport of chlorinated solvents in the groundwater, and up-gradient monitoring well data in the immediate vicinity of the Richland Federal Building. Additionally, the environmental reports that have been received by Ecology do not provide adequate information regarding the solvent storage system maintenance, operation, decommissioning, and types of solvents stored, to verify that no release has occurred from the tanks and associated piping system.

With the potential that solvent-contaminated groundwater is migrating onto the Richland Federal Building facility I recommend that Shannon & Wilson and the building owner, General Services Administration, review the provision in the Washington State Model Toxics Control Act law that addresses this issue. The portion of the Washington State law that addresses sites contaminated by off-site sources can be found at RCW 70.105D.020 (12) (iv). A copy of the Model Toxics Control Act law and regulation has been enclosed for your reference.

Ecology will update its database to reflect this "No Further Action" determination for the release of petroleum fuel from the emergency generator fuel storage tank. Your site will be noted in the database as having solvent-contaminated groundwater. This notation is an indication that the contamination is present, not that the facility is the source of the contamination.

Ms. Donna Parkes
March 22, 2000
Page 3

Ecology does not assume any liability for any release, threatened release or other conditions at the site, or for any actions taken or omitted by any person or his/her agents or employees with regard to the release, threatened release, or other conditions at the site.

If you have any questions or concerns regarding the contents of this letter, please contact me at (509) 454-7840.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Peterschmidt". The signature is fluid and cursive, with the first name "Mark" being particularly prominent.

Mark Peterschmidt
Voluntary Cleanup Program Coordinator, Central Region
Toxics Cleanup Program

Enclosure: MTCA

cc: Richard Harshberger, General Services Administration
Avra Veilleux, Shannon & Wilson, Inc.
Don Abbott, WDOE
Debra Kroon, WDOE