WASHINGTON STATE
DEPARTMENT OF
ECOLOGY

Southwest Regional Office
Toxics Cleanup Program
PO Box 47775
Olympia, WA 98504-7775
360-407-6240

TRANSMITTAL MEMO

Date: July 12, 2006

TO: Steve Misiurak
City of Gig Harbor

RE: *Eddon Boat Park*
SW0688

Subject: Explanation of Timeline

NOTE: **The date on the determination letter reflects the date the decision was made and the billing process began. We do not release determination letters until payment has been received.**

Ecology Determination date: June 29, 2006

Ecology Billing Sent: June 30, 2006

Your Payment Processed: July 11, 2006

Ecology Determination letter mailed/sent: July 12, 2006

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

CERTIFIED MAIL

June 29, 2006

Steve Misiurak
City of Gig Harbor
3510 Grandview Street
Gig Harbor, Washington 98335

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

- Name: Eddon Boat Park
- Address: 3711 and 3805 Harborview Drive, Gig Harbor, WA
- Facility/Site No.: 1301959
- VCP No.: SWO688

(Response to Technical Memorandum No. 4)

Dear Mr. Misiurak:

Thank you for submitting your independent remedial action report for the Eddon Boat Park (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.

For the current Opinion Letter, Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. June 12, 2006, Anchor Environmental, L.L.C. Technical Memorandum No. 4, Completed Investigation Activities, Eddon Boat Park, 3711 and 3805 Harborview Drive, Gig Harbor, WA.

The reports 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, Leslie Koziara, at (360) 407-6365.

The Site is defined by the extent of contamination caused by the following release(s):

- Petroleum Hydrocarbons in Soil
- Carcinogenic Polycyclic Aromatic Hydrocarbons (cPAHs) in Soil
- Metals in Soil
- Semi-volatile Organic Compounds in Sediments
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Sediments
- Polychlorinated Biphenyls in Sediments
- Metals in Sediments
- Tributyltin in Sediments
- Petroleum Hydrocarbons in Groundwater
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Groundwater
- Semi-volatile Organic Compounds in Groundwater
- Metals in Groundwater

The Site is more particularly 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 independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site are 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 the following release(s):**

Heating Oil Underground Storage Tank
- Petroleum Hydrocarbons in Soil
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Soil

AG-8 Area
- Petroleum Hydrocarbons in Soil
- Volatile Organic Compounds in Soil
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Soil
- Metals in Soil

Orchard Area
- Arsenic and Lead in Soil

Lower Terrace Area
- Petroleum Hydrocarbons in Soil
- Volatile Organic Compounds in Soil
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Soil
- Metals in Soil

However, the independent remedial action(s) performed at the Site are not sufficient to meet MTCA's substantive requirements for characterizing and addressing the following release(s):

AHA-1 Area
- Petroleum Hydrocarbons in Soil
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Soil

Heating Oil Aboveground Storage Tank
- Petroleum Hydrocarbons in Soil
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Soil

AG-9 Area
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Soil

Sediment Management Units

- Semi-volatile Organic Compounds in Sediments
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Sediments
- Polychlorinated Biphenyls in Sediments
- Metals in Sediments
- Tributyltin in Sediments

Sitewide

- Petroleum Hydrocarbons in Groundwater
- Carcinogenic Polycyclic Aromatic Hydrocarbons in Groundwater
- Semi-volatile Organic Compounds in Groundwater
- Metals in Groundwater

Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at this Site under MTCA. Further uplands soil characterization and remediation is needed at the AHA-1 area, heating oil above-ground storage tank, and the AG-9 area. The type and extent of groundwater contamination at the site has not been fully defined. Additional alternatives for the cleanup of contaminated sediments need to be developed.

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.

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 conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (360) 407-6247 or via e-mail at stee461@ecy.wa.gov.

Sincerely,

SS Teel

Steve Teel, LHG
Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

ST/ksc:SW0688 PS FA

Cc: John J. Renda, R.G., Anchor Environmental, L.L.C.
David Templeton, Anchor Environmental LLC
Lewis Bud Whitaker, Inspectus
Mark Larsen, RETEC
Chuck Cline – Ecology
Joyce Mercuri - Ecology
Robert Warren – Ecology
Trish Akana – Ecology

ENCLOSURE A

The property is on the shore of Gig Harbor, in the town of Gig Harbor. It is generally sloping toward shore, with some flat areas. There were two bulkheads (at 90 degree angles) present between upland and tideflat at south end, then the shoreline is unprotected north in front of the house to the dock and marine railway. Primary use of the north end of the site was for a boat repair facility, which included two marine railways, a boat repair building, and a dock (facilities still present). A single family residence is adjacent to the boat facility to the south. There were two additional buildings in the south part of the site (both now demolished) – one of the buildings (known as the antique shop "Pandoras") was built around 1950, and was used for an undetermined amount of time as a City maintenance shop. The second building (age unknown - formerly used by Wild Birds Unlimited) was originally used as the office for a former gravel loading operation that operated at the site. There was a sloping driveway associated with former gravel operation that runs between the two buildings at the south end, and terminates in a below-grade concrete enclosure where trucks used to park for receiving gravel. There was reportedly a crane used for loading gravel between the barges and the trucks, but its location has not been identified. There was an above-ground 500 gallon heating oil tank located at the southwest corner of the boat building, and there was an underground heating oil tank on the north side of the house. The City of Gig Harbor intends to convert the property to a park, but they do intend to preserve the historic boat repair building and marine railways. The house may be removed. Park development plans have not been finalized.

Originally the VCP was submitted by a previous property owner for this land, plus the 2 parcels to the North. That VCP was refunded because in 2004, the City of Gig Harbor purchased the two subject parcels, and the VCP was resubmitted by the City. The parcels include tidelands and it does not appear that there are other property owners of the tidelands. The following parcel information was obtained from the Pierce County Tax Assessor's web site:

3805 Harborview Drive: Assessor's Parcel Number (APN) 0221053074; 0.95 acres

3711 Harborview Drive: APN 0221053050; 1.91 acres

The Site appears to primarily consist of the two-parcel property, a small area of land on the adjacent parcel to the north of the boat repair building - where a hand auger sample indicates some CPAH are present above the MTCA, Method A cleanup standard for unrestricted land use, and adjacent sediments. However, the total area of affected sediments has not yet been defined.

Although Gig Harbor is known to be affected by the Tacoma Smelter Plume, results for arsenic from surface soil samples were not elevated, indicating this site is apparently not affected by area wide contamination.

The following environmental concerns are present in the **uplands** portion of the site.

Uplands Soil Contamination: Previous uplands soil characterization identified the following areas of concern:

AHA-1 Area: A sample from location AHA-1 (1.5- to- 3-foot depth) had a concentration of 384 total carcinogenic polycyclic aromatic hydrocarbons (CPAHs); this value exceeds the Model Toxics Control Act (MTCA) Method A Cleanup Level for unrestricted land use. This sample location is just outside of a door on the north wall of the boat repair building, where it is reported that some disposal or storage of chemicals occurred in the past. ***Assessment and remediation of this area needs to be performed.***

Heating Oil Underground Storage Tank: A sample from location AG-5 (1.0- to- 2.5-foot depth) near the heating oil underground storage tank (UST) adjacent to a residence (former Hoppen house) had a concentration of 417 total CPAHs; this value exceeds the MTCA Method A Cleanup Level for unrestricted land use. This UST was subsequently removed; upon removal of the tank, approximately 0.5-feet of water was present at the bottom of the 4-foot deep excavation. Soil samples were collected on the north, south, east, and west sidewalls (2.5-foot depth), at the bottom center, and a five-point composite from the soil stockpile for analysis of petroleum hydrocarbon identification (HCID), total petroleum hydrocarbons – gasoline range (TPH-G), total petroleum hydrocarbons – diesel range (TPH-D), and semi-volatile organic compounds. A water sample was also collected. All of the sidewall samples were below the Cleanup Level. However, the soil and water samples from the bottom of the excavation exceeded the Cleanup Level for TPH-G and TPH-D and the soil stockpile sample exceeded the level for cPAHs. The water from the excavation bottom was pumped to a 55-gallon drum for disposal and the excavation was deepened an additional 3-feet and a bottom sample was collected; all results for the above constituents were below the cleanup level. Water was initially not present at the bottom of the excavation but after a period of four days, water was present. A sample of this water showed no detectable TPH-G, TPH-D, or cPAH results.

Heating Oil Aboveground Storage Tank: A heating oil aboveground storage tank (AST) was formerly present at the west end of the boat building. Petroleum hydrocarbon contamination was reported from a soil boring adjacent to the AST (boring HB3). The previous Opinion Letter stated that additional characterization in this area was necessary. ***Assessment and remediation of this area still needs to be performed.***

AG-8 Area: A sample from location AG-8 (0- to- 0.5-foot depth) in the gravel parking area behind the former city maintenance building had concentrations of TPH-O (2,160 milligrams per kilogram [mg/kg]) and lead (586 mg/kg) that exceeded the MTCA Method A Cleanup Level for unrestricted land use (cPAHs were not detected). The next sample, from the 1.5 – 3 foot depth, contained only 4 mg/kg lead. Nearby sample AG-7 5 (0- to- 0.5-foot depth) also contained detectable TPH-O (1330 mg/kg); however, this result is below the Cleanup Level of 2000 mg/kg. A 13-foot area was excavated around the AG-8 location to a depth of 2-feet below grade. Discrete confirmation soil samples were collected from the sidewalls (three samples) the bottom (two samples) for TPH and lead; all results were below the Cleanup Level.

Orchard Area: In the previous Opinion Letter, Ecology recommending collecting samples for lead and arsenic analysis from the orchard. During a March 13, 2006 site visit, it was agreed that a 5-point composite sample from 0- to- 0.5-feet below ground surface (and below the sod) would probably be adequate. The analytical results from this composite sample were all below the Cleanup Level.

Lower Terrace: During the March 13, 2006 site visit, Ecology expressed a concern regarding potential residual soil contamination from past practices at the former city maintenance building and/or from a discarded above-ground oil storage tank that had been discovered during brush-clearing work. To address these concerns, three shallow test pits were excavated during the site visit to check for visual indications of contamination or improper disposal. Three oil filters were discovered in one of the test pits. On March 29, 2006, three test pits were excavated from this area and one confirmation sample was collected from each pit for TPH – Hydrocarbon Identification Method (HCID), volatile organic compounds (VOCs), cPAHs, and metals. All results were below the Method A Cleanup Level for Unrestricted Uses.

Crane Area: In the previous Opinion Letter, Ecology requested that the

location of the gravel loading crane should be identified and sampled. During a site visit in February 2006, it was agreed that Ecology would revisit the site after brush clearing was completed to assess if further investigation in the crane area was necessary. During the March 13, 2006 site visit Ecology inspected the former crane area and determined that no further investigation was necessary.

AG-9 Area: A sample from location AG-9 (8.0- to- 10-foot depth) had a concentration of 378 total cPAHs; this value exceeds the MTCA Method A Cleanup Level for unrestricted land use. The source of the cPAH contamination at AG-9 was tentatively identified as creosote and therefore may be from a buried timber. ***Assessment and remediation of this area needs to be performed.***

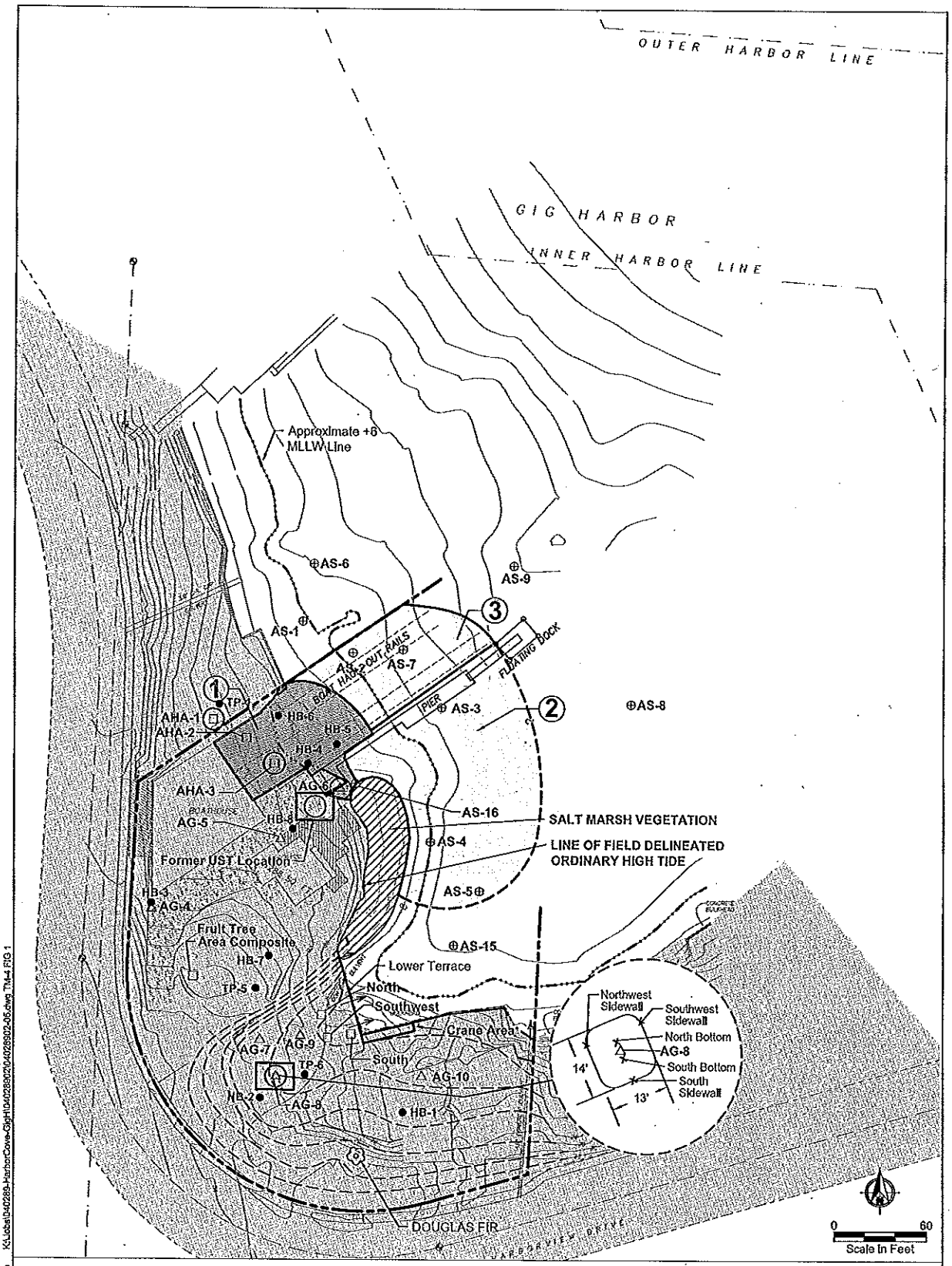
Groundwater: Groundwater was obtained from five of the push probe borings (AG-4, -5, -6, -9, and -10). Since the pathway of concern for shallow groundwater on this site is most likely to be discharge to surface water, groundwater concentrations were compared to the appropriate water quality criteria (Washington State Marine Water Quality Criteria (WAC 173-201A), and the Clean Water Act Section 304 criteria for human health if available). However, a potability evaluation of groundwater should be performed to determine if drinking water standards apply.

- Selected metals results in groundwater at AG-4, -6, and -9 are above Marine Water Quality Criteria (WAC 173-201A). Locations AG-6 and -9 exceed these criteria for zinc and lead; locations AG-4, and -6 exceed the copper criteria; and mercury was above the criteria at AG-6.
- Arsenic is slightly above the 5 parts per billion (ppb) Federal drinking water standard in AG-6 (6.7 ppb).
- Metals in groundwater are above the Federal human health criteria (Section 304 Clean Water Act, and/or National Toxics Rule) for arsenic in surface water (AG-4, -6, and -9) and mercury (AG-6).
- TPH is present in boring AG-9, at the south end of the site, slightly above the Method A standard for groundwater.

Groundwater monitoring wells should be installed so that additional assessment of groundwater concentrations can be performed.

ATTACHMENTS (from consultant report)
Figure 1 (Completed Actions)

NOTE: This opinion letter constitutes a new form letter under which Ecology will issue technical consultation and advice pursuant to WAC 173-340-515. This opinion letter changes certain terminology to more closely reflect MTCA and its implementing regulations. This opinion letter takes the place of, and is functionally equivalent to, the "interim" or "conditional" No Further Action (NFA) letters issued by Ecology in the past.



Deck / Dock
Concrete Dock
Piling
Outfall
HB-1 Existing Soil/Sediment Sample Location and Number
Property Line
Contours (approximate)

Anchor Sample Location and Number
AS-1 Sediment
AHA-1 Hand Auger
AG-1 Geoprobe

Sediment Management Unit (SMU)
Prescriptive Removal, Grading, and Capping
Completed 3/2006

Note:
1. Base map prepared from drawing provided by Thorton Land Surveying, Inc. entitled 12-9-04 by dwg name (7112-work-2.Dwg).
2. Horizontal Datum: SP NAD 83 WA S.
3. Demolished 4/2006.

May 23, 2006 8:14am ctavidson K:\Jobs\340289-HarborCove-Sight\340289020\040289020-05.dwg TM-4 FIG 1

ANCHOR ENVIRONMENTAL, L.L.C.

Figure 1
Completed Actions
Eddon Boatyard Property