



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

December 27, 2016

Mr. Phil Pinard  
City of Richland, Parks and Recreation  
PO Box 190, MS 6  
Richland, WA 99352-0190

Re: No Further Action at the following Site:

Site Name:	Columbia Park Marina
Site Address:	1776 Columbia Park Trail, Richland
Facility Site No.:	84244226
Cleanup Site No.:	6750
VCP Project No.:	CE0396

Dear Mr. Pinard:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Columbia Park Marina facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

### **Issue Presented and Opinion**

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Is further remedial action necessary to clean up contamination at the Site?

**NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.**

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively “substantive requirements of MTCA”). The analysis is provided below.

### **Description of the Site**

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This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release:

- Gasoline-Range Petroleum Hydrocarbons (GRPH) into soil and groundwater.
- Volatile Organic Compounds (VOCs) into soil and groundwater.



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- Metals into soil and groundwater.

**Enclosure A** includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel associated with this Site is affected by other sites.

### **Basis for the Opinion**

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This opinion is based on the information contained in the following documents:

- White Shield, 1994. *Lust Closure/ Interim Cleanup Report, The Boat Shop, WSDOE Site #009266, Richland, WA.* June 1994,
- Shannon & Wilson, 1994. *Remedial Investigation, Columbia Park West Marina, Ecology Site 84244226, Richland, WA.* April 2014
- Shannon & Wilson, 2016. *Groundwater Monitoring, Columbia Park West Marina, Ecology Site 84244226, Richland, WA.* September 2016

These documents are kept at the Central Regional Office (CRO) of Ecology for review by appointment only. You can make an appointment by calling the CRO resource contact at 509-575-2027.

This opinion is void if any of the information contained in those documents is materially false or misleading.

### **Analysis of the Cleanup**

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Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

#### **1. Characterization of the Site.**

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

In 1994, two, 1,000-gallon Underground Storage Tanks (USTs) were removed from the Columbia Park Marina. The USTs stored gasoline from the late 1960s until the late 1980s when they were decommissioned in favor of new above ground storage tanks (ASTs).

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Characterization activities included collecting soil samples from sidewalls of the excavation and water from the base of the excavation. Samples were collected both directly after the removal of the USTs and after the excavation of about 7 cubic yards (CY) of petroleum contaminated soil (PCS).

The hazardous substances released at the Site were petroleum products. Specifically; gasoline, associated volatile constituents Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX), and Lead (Pb).

In 2014, Shannon & Wilson performed a remedial investigation of soil and groundwater. Three groundwater monitoring wells were installed and soil samples were collected during the well installation. An initial groundwater sampling event occurred in March 2014, then four non-consecutive quarters of monitoring occurred during September 2014, December 2015, March 2016, and June 2016. The lack of four consecutive quarters is not considered significant due to the stable groundwater conditions at the Site. Groundwater elevations are discussed further in **Enclosure A**.

No soil or groundwater sample collected during the investigation had concentrations above the lab reporting limits for GRPH or BTEX. However, one groundwater sample collected during the March 2014 event, at the down-gradient well MW-2, had a Pb concentration exceeding the MTCA Method A cleanup level (71 ug/L vs. 15 ug/L).

Subsequent groundwater monitoring events have shown **no** detectable concentrations of any contaminants with the exception of Pb detected at up-gradient MW-1 during the June 2016 sampling event. The reported concentration was just slightly above the laboratory detection limit (1.2 ug/L vs. <1.1 ug/L) and is not considered to be associated with the Site petroleum release based on the hydrologically up-gradient location of MW-1 relative to the release, the very low concentration significantly below the MTCA Method A cleanup level, and the likelihood of residual lead and arsenic contamination from historical agricultural pesticides.

The initial Pb exceedance at MW-2 is likely the result of turbidity produced by the sampling method used (bailers). Subsequent monitoring events have been performed using low-flow sampling procedures.

## **2. Establishment of cleanup standards.**

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA. The cleanup levels selected are protective of human health and the environment.

**a. MTCA Method A Soil Cleanup Levels** for unrestricted land uses were selected.

▪ Gasoline-Range Petroleum Hydrocarbons (cleanup level dependent on the presence of benzene)	30/100 mg/kg
▪ Benzene	0.03 mg/kg
▪ Toluene	7 mg/kg
▪ Ethylbenzene	6 mg/kg
▪ Xylenes	9 mg/kg
▪ Lead	250 mg/kg

**b. MTCA Method A Groundwater Cleanup Levels** were selected. The cleanup levels are based on drinking water beneficial uses.

▪ Gasoline-Range Petroleum Hydrocarbons (cleanup level dependent on the presence of benzene)	800/1,000 ug/L
▪ Benzene	5 ug/L
▪ Toluene	1,000 ug/L
▪ Ethylbenzene	700 ug/L
▪ Xylenes	1,000 ug/L
▪ Lead	15 ug/L

**c. Points of Compliance**

A standard point of compliance (POC) was selected for both soil and groundwater.

- Soil: For soil cleanup levels based on direct contact, the POC is defined as throughout the Site from the ground surface to 15 feet below the ground surface.
- Groundwater: The standard POC is defined as throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth that could potentially be affected by the Site.

**3. Selection of cleanup action.**

Ecology has determined your cleanup action meets the substantive requirements of MTCA.

The cleanup action selected protects human health and the environment, complies with cleanup standards, complies with applicable state and federal laws, and is permanent.

#### 4. Selection of cleanup action.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

The cleanup actions selected for the Site consisted of excavation and off-site disposal of petroleum contaminated soil, and the operation of a water aeration system in the open tank excavation after removal of the USTs.

Compliance with Site cleanup standards was determined through:

- a. Confirmational monitoring of groundwater for four quarters.
- b. Confirmational sampling of soil in the vicinity of the release after removal of PCS, and direct comparison to the established cleanup levels.

#### **Listing of the Site**

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Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.
- Leaking Underground Storage Tank List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

#### **Limitations of the Opinion**

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##### 1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

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To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

**2. Opinion does not constitute a determination of substantial equivalence.**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

**3. State is immune from liability.**

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 opinion. *See* RCW 70.105D.030(1)(i).


**Termination of Agreement**

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Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (VCP Project No. CE0396).

For more information about the VCP and the cleanup process, please visit our web site: [www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm](http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm). If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (509) 454-7839 or e-mail at [Jennifer.Lind@ecy.wa.gov](mailto:Jennifer.Lind@ecy.wa.gov).

Sincerely,



Jennifer Lind  
Toxics Cleanup Program-CRO

Enclosures (1): A – Description and Diagrams of the Site

cc: Matt Alexander, VCP Financial Manager  
Amy Ford, Columbia Park Marina  
Lynne Koehler  
Donna Parkes, Shannon & Wilson, Inc.  
Don Redman, Army Corps of Engineers  
Joe Schiessl, City of Richland  
Paul Shampine, Army Corps of Engineers