



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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January 9, 2017

Ms. Erin Black  
National EHSS Manager  
Coca-Cola Company  
PO Box 1734  
Atlanta GA 30301

**Re: No Further Action at the following Site:**

- **Site Name:** Coca Cola Bottling Co of Wash Bellingham
- **Site Address:** 2101 Woburn Street Bellingham Washington
- **Facility/Site No.:** 64254993
- **Cleanup Site ID No.:** 6428
- **VCP Project No.:** NW2661

Dear Ms. Black:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Coca Cola Bottling Co of Wash Bellingham 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 also 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 releases:



- Total petroleum hydrocarbons as gasoline (TPH-GRO) and diesel (TPH-DRO) range organics in soil and ground water.

### **Basis for the Opinion**

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

1. ATC Group Services LLC, January 13, 2016, 2015 Groundwater Monitoring and Sampling Report.
2. Cardno, August 11, 2015, Soil and Groundwater Investigation.
3. Cardno ATC, February 20, 2014, Work Plan for the Assessment of Off-Property Impacts, Groundwater Well Installation and Monitoring Program.

The documents listed above are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at (425) 649-7235, or sending an email to [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

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 further clean up the contaminated soil at the Site. That conclusion is based on the following analysis:

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

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

An initial site assessment was conducted in 1999 at this Site to study petroleum product contamination due to operation of the former service station. The assessment reported that TPH-GRO and TPH-DRO in soil and ground water at and adjacent to the former 2,000-gallon underground storage tank (UST) excavation were present at concentrations exceeding MTCA Method A cleanup levels.

Between 2005 and 2011, numerous Site remedial efforts were performed to characterize the Site contamination and clean up the contaminated soil. As a result, 25 soil borings and 7 ground water monitoring wells were advanced, and 32 tons of the impacted soil were excavated and disposed off-Site.

In an opinion letter dated May 19, 2014 to respond on your request, Ecology determined that further action was necessary because the contamination was not fully characterized along the western part of the Site beneath Valencia Street.

To comply with Ecology's determination, three additional monitoring wells (MW-8, -9 and -10) were installed in November 2014 within the city right-of-way beneath Valencia Street (Figure 2). Soil and ground water samples were collected for analysis from five monitoring wells. The laboratory results indicated all the concentrations of TPH-GRO and TPH-DRO in the monitoring wells were at concentrations below the cleanup levels.

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

### **Substance-specific standards.**

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

Cleanup levels for soil at this Site are defined as the MTCA Method A cleanup levels for unrestricted land use.

The point of compliance for soil is based on the protection of ground water and it is applied Site-wide throughout the soil profile, which will extend below the water table.

Cleanup levels for ground water contamination at this Site are defined as the MTCA Method A cleanup levels.

The point of compliance for ground water is throughout the Site from the uppermost level of the perched zone to the lowest saturated aquifer which could potentially be affected by the Site.

The Site qualifies for an exclusion from conducting a terrestrial ecological evaluation (WAC 173-340-7491(c)(i)). There is no undeveloped land or terrestrial habitat on or within 500 feet of the Site. Therefore, protection for terrestrial habitat is not needed for this Site in accordance with MTCA.



### **3. Selection of cleanup action.**

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

Following a UST closure in 1999 at this Site, an initial Site assessment discovered TPH-GRO and TPH-DRO in soil and ground water at concentration exceeding MTCA Method A cleanup levels. By 2011, various cleanup efforts had been conducted. The activities included determining contamination sources, defining chemicals of concern (COCs), characterizing contamination, excavating impacted soil, confirming soil removal completion, and monitoring ground water.

### **4. Cleanup.**

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site at MTCA Method A cleanup levels for all the COCs aforementioned. This determination is based on the performances specified below:

Several Site assessments were performed at this Site between 1999 and 2014. As a result, the Site was fully characterized. Soil and ground water were identified to be contaminated with TPH-GRO and TPH-DRO, which was derived from operation of the former service facility.

After the UST was removed in 1999, a total of 32 tons of petroleum product-contaminated soil exceeding MTCA Method A cleanup levels was excavated and disposed of at an off-Site regulated landfill. The follow-up soil confirmation sampling indicated that soil removal to non-detectable, or below MTCA Method A cleanup levels was achieved.

There were ten monitoring wells installed to characterize and monitor ground water contamination during the various Site assessments and remedial activities. Five wells (MW-2, -3, -4, -6 and -7), however, were destroyed in October 2011 during soil excavation. From 2014 to 2015, four consecutive quarterly ground water monitoring events were conducted. The monitoring well network consisted of five wells (MW-1, -5, -8, -9 and -10), which were located at up-, cross- and down-gradient of the contaminant plume at the Site (Figure 2). All the analytical data demonstrated that concentrations of the COCs were below MTCA Method A 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:

- Confirmed and Suspected Contaminated Sites List

### **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.

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**

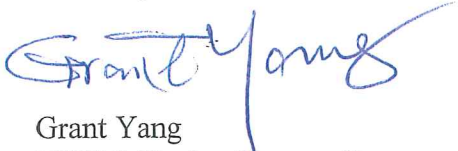
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Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project #NW2661.

Erin Black  
January 9, 2017  
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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 (425) 649-7126 or e-mail at  
[grant.yang@ecy.wa.gov](mailto:grant.yang@ecy.wa.gov).

Sincerely,



Grant Yang  
NWRO/Toxics Cleanup Program

Enclosures (2)    A - Site Description  
                          B - Site Diagrams

CC    Sonia Fernandez, VCP Coordinator, Ecology  
      Matt Alexander, VCP Financial Manager, Ecology



## Enclosure A

### Site Description

*This enclosure provides Ecology's understanding and interpretation of Site conditions and forms part of the basis for the opinion expressed in the letter.*

**Site:** The Site is located at 2101 Woburn Street, Bellingham, Washington (Property) (see Figure 1) and consists of TPH-GRO and TPH-DRO contamination in soil and ground water. The Property covers Whatcom County tax parcel number 3803294814790000.

**Area and Property Description:** The Site is bounded to the north by Texas Street, to the east by Woburn Street, to the south by Kentucky Street and to the west by Valencia Street. The Property, which is comprised of 2.6 acres, is surrounded by commercial and residential land in the city of Bellingham (Figure 1).

**Property History and Current Use:** A 2000-gallon UST installed in 1978, along with a fuel dispenser, was used to store and supply unleaded gasoline, and diesel later, to service vehicles for the Coca Cola company. Coca Cola began storing diesel fuel in the UST in 1988. In 1989, approximately 100 gallons of diesel fuel were reportedly spilled. The gasoline and diesel fuel supply service business was terminated in 1999, and the UST was removed from the Property, along with excavation of approximately 20 cubic yards of impacted soil and pumping-out of approximately 40 gallons of contaminated ground water.

**Sources of Contamination:** Based on the Site assessments and facility operation records, the presence of petroleum products was confirmed in soil and ground water at this Site. Impacts of the contaminants to Site soil and ground water occurred over time through releases from spills and releases of the former UST service system (Figure 2).

**Physiographic Setting:** The Site is located in the Fraser-Whatcom Lowland, a northerly extension of the Puget Sound Lowland physiographic province. Within the lowland, the Nooksack River has developed a broad alluvial plain near the Site. This plain is characterized as a low and gentle rolling hills with an average elevation not exceeding 600 feet above sea level.

**Surface/Storm Water System:** The closest surface water body to the Site is Lake Whatcom, which is approximately 4,500 feet to the east. Surface water and storm water runoff on and in the vicinity of the Site disperse via sheet flow to the city of Bellingham's storm water drainage system.

**Ecological Setting:** The Site and surrounding area consist of developed land occupied by residential and commercial buildings, streets, paved areas and other physical barriers. Therefore, the urban environment prevents wildlife from feeding on plants, earthworms, insects, or other food sources in or on the soil.

**Geology:** The Site and vicinity are primarily underlain by the Vashon glacial till, a dense unconsolidated deposit characterized by poorly-sorted materials. A thin layer of Vashon Recessional outwash and alluvial deposits is also present in the area, as recorded in well logs to depths of at least 20 feet below the ground surface overlying the till at this Site.

**Ground Water:** Ground water occurred within a perched zone was encountered from approximately 3 to 6 feet bgs. The ground water flow direction generally varies from the south to west-northwest (Figure 2).

**Water Supply:** A public water supply is currently provided to the Property by the city of Bellingham. According to Ecology's well log data base, there are no private drinking water wells located within approximately 1,000 feet of the Property.

**Releases and Cleanup of Soil Contamination:** Soil and ground water were contaminated due to releases from the former gasoline and diesel service facility at this Property from 1978 to 1999. Various investigative and cleanup efforts were conducted at the Site, which included removal of the UST, characterization of the Site and over-excavation of the contaminated soil. As a result, approximately 32 tons of soil contaminated with TPH-GRO and TPH-DRO were excavated (Figure 2) and the materials disposed off-Site at a regulated disposal landfill.

Confirmation soil samples were collected at bottom and sidewalls of the excavation. The samples were analyzed for TPH-GRO and TPH-DRO. The laboratory results indicated that the impacted soil exceeding MTCA Method A cleanup levels was successfully removed.

**Releases and Extent of Ground Water Contamination:** During Site investigations, a total of ten monitoring wells were installed to characterized contamination in ground water. Five of them were terminated during the soil remedial excavation in 2011. Based on the most recent sampling reports conducted between 2014 and 2015, TPH-GRO and TPH-DRO ground water in the five existing monitoring wells (Figure 2) were at concentrations below MTCA Method A cleanup levels for four consecutive quarterly monitoring events.



## Enclosure B

Figure 1 Location of the Site and Vicinity

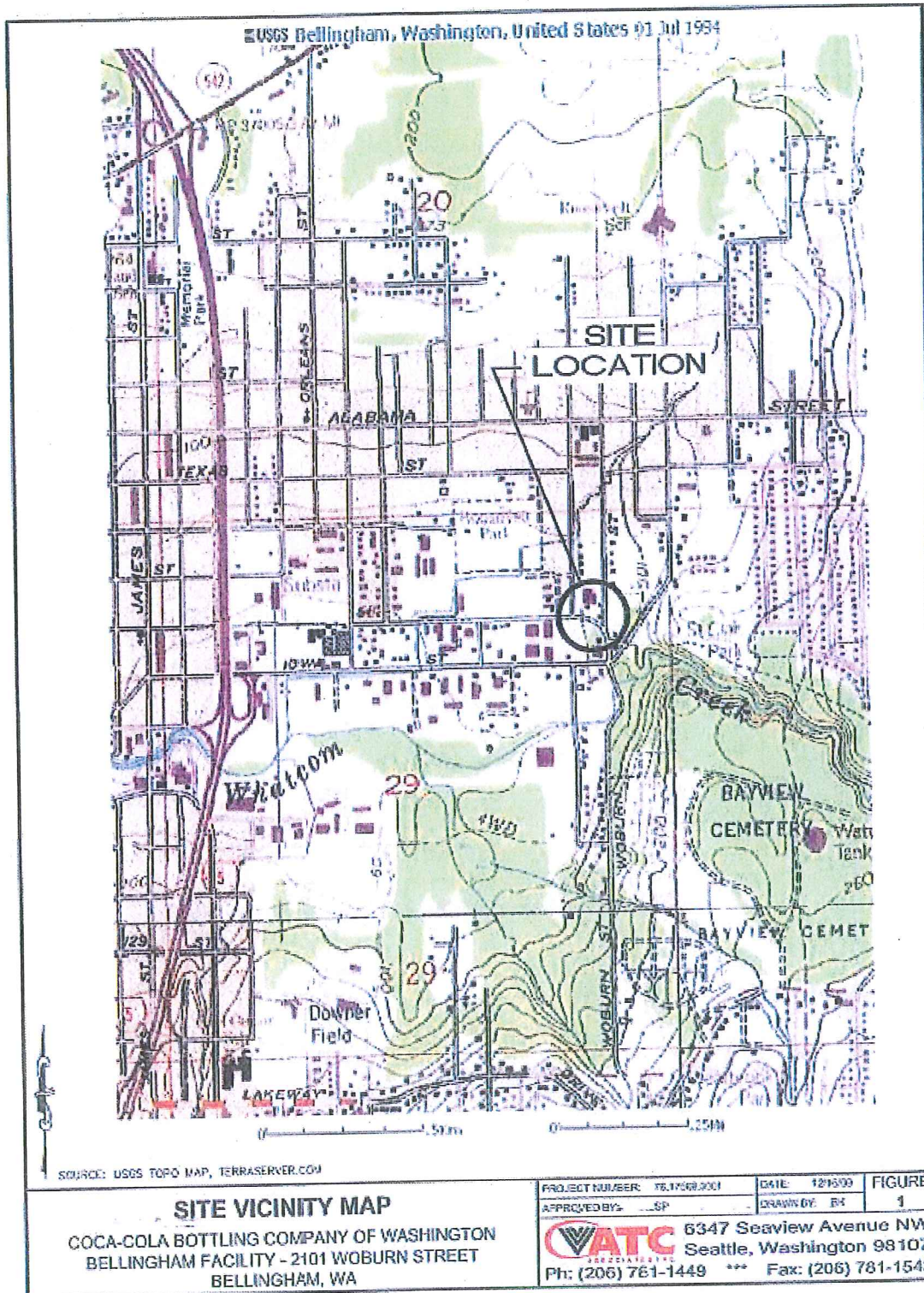


Figure 2 Locations of UST and Soil Excavation, Ground Water Monitoring at the Site

