STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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April 27, 2017

Mr. Edward Clement
CenturyLink
600 New Century Pkwy
New Century KS 66031

Re: Request for Additional Information to Provide Opinion on the Investigation under VCP for the following Contaminated Site:

- **Site Name:** Cascade Autovon Company
- **Site Address:** 12727 412th Ave SE, North Bend, WA 98045
- **Cleanup Site ID:** 8879
- **Facility/Site ID:** 36296841
- **VCP Project ID:** NW3098

Dear Mr. Clement:

Thank you for submitting the Remedial Investigation Report for the Cascade Autovon Company Site for review by the Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Based on a preliminary review, Ecology determined the reports are incomplete. Additional information is needed to provide an opinion regarding the cleanup. The enclosed Checklist identifies what additional information Ecology needs.

Ecology wants to provide you an opportunity to update and resubmit the report to include the additional information specified in the enclosed Checklist and any existing site characterization information available for the Site while you wait for a Site manager to be assigned. The Site's position on the VCP Wait List will remain the same. However, if an updated report is not received when a Site manager is assigned, the position in the Wait List cannot be guaranteed. By providing the requested information, Ecology can then provide a written opinion on the submitted reports.

When updating the report/s, please reference our report Template, available at http://www.ecy.wa.gov/programs/tcp/policies/checklists.html. Ecology developed both the Checklists and Template to provide clarity on our expectations for work plans and reports. We hope you find them useful.

If you have any questions about this request or how to complete your report, please me at (425) 649-7233 or sofe461@ecy.wa.gov. Thank you for your cooperation, and we look forward to working with you.

Sincerely,

Sonia Fernández
VCP Coordinator
Toxics Cleanup Program, NWRO

Enclosure (1) Checklist

cc: Ecology Site File
Dave Parkinson, Geosyntec Consultants (email)

Incomplete Report: The "Remedial Investigation Report, Cascade Autovon Co. Facility" provided to Ecology is not the equivalent of an RI report. Several key elements are needed in text, tables, and figures to adequately document Site conditions, including but not limited to comprehensive Site data summary tables, groundwater flow maps, and TEE forms.

2017

Remedial Investigation Checklist
Cascade Autovon Co., NW3098

Toxics Program

DEPARTMENT OF ECOLOGY
State of Washington

May 2016

Publication No. 16-09-006

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FSID: 36296841

Report Name: Remedial Investigation Report, Cascade Autovon Co. Facility, 12727 412th Ave. SE, North Bend, WA, 9/30/2016

Date Submitted: 10/27/2016

Reviewed By: M. Warfel

Review Date: 4/17/2017

Remedial Investigation (RI) Checklist Guidance

The Model Toxics Control Act (MTCA) regulation Washington Administrative Code (WAC) 173-340-350(7) broadly describes the elements necessary to complete a RI. The purpose of a RI is to collect and evaluate sufficient information to fully characterize the nature and extent of contamination at a site.

This RI checklist is considered guidance based on the MTCA cleanup regulation WAC 173-340. Cleanup project managers with the Washington State Department of Ecology (Ecology) have discretion when reviewing and accepting RI reports as site-specific circumstances dictate the necessary scope and breadth of each report.

Remedial Investigation Report Body

I. Cover Letter. Include a letter describing the submittal and specifying the desired department action or response.

II. Introduction.

a. **General Site Information.** Include contact information for project coordinators (Ecology site manager, consultants, potentially liable persons (PLP), and current owner/operator). Include the site name and identification numbers, general description, and location (e.g., GPS coordinates, assessor parcel number, Quarter Section Township Range, address).

b. **Site History.** Describe site from earliest known time of habitation and/or development. Describe previous owners/operators, past uses of the site, and all potential/known sources (both on-site and off-site) of contamination (e.g., petroleum storage tanks, manufacturing processes, chemical storage, etc.). Include approximate dates or periods of past product and waste spills, identification of the materials spilled, and amount/location of the spill.

c. **Site Use.** Describe current site uses, land use/zoning, and future use plans.

III. Field Investigations

a. **Previous Environmental Investigations.** Discuss prior work performed, samples obtained, why sampling locations were chosen, etc. Cite any previous environmental reports.

b. **Site Characterization.** Discuss current site characterization activities for each site media (surface water/sediments, soils, groundwater systems, air, and cultural history/archeology, if applicable). Name site contaminants of concern (COCs) and discuss why they were chosen for analysis. Describe how prior and current work efforts contribute to the understanding of the nature and extent of contamination.

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Adequate	Incomplete	Missing	N/A	Comments
x				
x				
	x			Need complete chronological summary of historical site use, site investigations, and site remediation.
x				
	x			Cite/summarize all investigations referenced in the Site Hazard Assessment.
x				

c. **Sampling/Analytical Results.** Discussion of sampling/analytical results should include contaminants analyzed for in samples from each applicable site media (soil, groundwater, vapor, surface water). Include comparison of the results to the applicable Method (A, B, or C) cleanup level, sampling method, laboratory method, and any special sampling or analytical protocols (silica gel, filtration, etc.). Evaluate the quality of the data.

IV. Conceptual Site Model

a. **Conceptual Site Model (CSM).** Discuss contaminant release, fate and transport, exposure pathways (surface water, groundwater wells, air, direct contact, etc.), and potential receptors (human, aquatic, terrestrial). Describe typical concerns for this type of environmental contamination, and include a discussion of site specific concerns (hydro-geologic setting, receptors, current or future site zoning/land use etc.).

V. Proposed Cleanup Standards

a. **General.** Clearly identify proposed cleanup levels for each media and rationale for selected level. Explain/justify mixing MTCA methods for different media. Must include a demonstration of conditions that require a calculated solution if one is to be use (e.g., background calculations, use of Method B or C, etc.) and show calculation of the cleanup level, including a list of the input parameters. Include point(s) of compliance.

b. **Terrestrial Ecological Evaluation (TEE).** A TEE should be performed, if required, as part of cleanup level selection. Reference WAC 173-340-7491 to see if the site qualifies for an exclusion.

www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm

VI. Summary, Conclusions, and Recommendations

a. **Summary and Conclusions.** Summarize what is known about the site and contamination (updated CSM). Include discussion of COCs that exceed MTCA or are "indicator hazardous substances." Ensure conclusions are supported by the tables and figures included with the report.

b. **Recommendations.** Outline possible interim/remedial actions if appropriate.

Remedial Investigation Figures

General – Figures should include a north arrow, scale, complete legend, measurement units, and annotated clarification as necessary. Figures should not be cluttered and must be legible and explicable. Document text must reference figures and draw conclusions consistent with information presented on figures. Consider using multiple figures when showing large amounts of information.

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Adequate	Incomplete	Missing	N/A
	x		

Need summary tables of all historical sampling data. Lab reports do not specify if silica gel cleanup was used on TPH-Dx samples.

Adequate	Incomplete	Missing	N/A
x			

Adequate	Incomplete	Missing	N/A
		x	

Need to include completed TEE form.

Adequate	Incomplete	Missing	N/A
x			

Adequate	Incomplete	Missing	N/A
x			

I. Vicinity Map(s)

a. Show property in relation to surrounding region. Area covered by Vicinity Map should be proportional to site size.

b. Show other applicable items including (but not limited to): surface topography, natural areas, surrounding land uses, location of groundwater supply and monitoring wells within a one mile radius.

II. Site Map(s)

a. Show overall site layout with site features and existing well, boring, and sampling locations labeled consistently with current and historical site data and sample names used in the report. If multiple names exist for a sampling location or area of the site indicate this.

b. Include COC locations, concentrations, and estimated vertical and horizontal extent of contamination for site media, as applicable. Include waste materials present on site as well as hazardous substance treatment, storage, or disposal areas (show current and historical features).

c. Show geologic/hydrogeologic information including soil types, wells, screened intervals, and water levels (cross sections are useful for showing this information). Show groundwater flow direction and gradient.

d. Show other relevant information including (but not limited to): site and property boundaries, buildings/facilities on site, historical site features, underground storage tanks (USTs), previous excavation/interim action activity, etc.

III. Conceptual Site Model

a. Provide figures showing contaminant release(s), fate and transport, exposure pathways, and potential and/or actual receptors. The lateral and vertical extent of contamination, as currently understood, should be clearly conveyed.

Remedial Investigation Tables

General - Tables should include detailed notes that explain any laboratory or other designations, assumptions, and references. All acronyms used in the table should be defined in a section of the notes even if they are defined in the body of the report, so table information can be quickly understood.

a. **Sampling Information/Laboratory Methods.** Include current and historical sampling methods and numerical cleanup levels, lab methods, reporting limits, and any special sampling protocols with justification or explanation (e.g. silica gel, filtration).

b. **Cleanup Levels.** Include potentially applicable ARAR values and recommended cleanup levels.

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Adequate	Incomplete	Missing	N/A	Comments
x				
	x			Need one map showing former site features (including all contamination sources), monitoring wells, borings, and remedial work.
	x			See above.
	x	x		See above. Hydrogeologic cross section not provided. Ground water elevation contour map not provided.
	x			See above.
		x		Not provided.
	x			See III (c) above.
x				

c. **Site Data.** Include current and historical analytical and field-measured data. Group by media type. For larger data sets, consider making a summary table of exceedances. Tables should include proposed cleanup levels with any contaminant exceedances clearly indicated using bold font or shading. Non-detectible levels should be noted as 'U' with the numerical laboratory reporting limit (RL) provided rather than 'ND'.

Remedial Investigation Appendices

General. Appendices should contain a description of content and explain how to interpret the information for use. Not all of the following suggestions will apply to all sites.

a. Exploratory logs, well installation diagrams, groundwater sampling logs, and field records.

b. Analytical laboratory report and Quality Assurance/Quality Control report.

c. **Limitations.** Explain any limitations that apply to the work.

d. Details of field and analytical methods used in former and current investigations and remedial activities. If applicable, append Work Plan/Sampling and Analysis Plan/Quality Assurance Project Plan/Health and Safety Plan.

e. Other documents that provide additional context or contribute to the understanding of the site – see suggested report format for additional information.

Miscellaneous Items

a. **Environmental Information Management (EIM).** All sampling data must be uploaded into Ecology's EIM database. This allows Ecology to access data, check results, and/or perform additional analyses. For more information, reference:

www.ecy.wa.gov/programs/tcp/data_submittal/Data_Requirements.htm

b. **Certification (Licensed Professional Stamp).** Engineering, geologic, and hydrogeologic work must be performed under seal of an appropriately licensed professional (RCW 18.43 and 18.220).

c. **Additional information may be requested by Ecology as required to fully define the site.**

d. **Submittal Requirements:** Ecology requests three copies of reports submitted per WAC 173-340-850. Please contact the cleanup project manager for specific submittal requirements.

To request ADA accommodation or materials in a format for the visually impaired, call Ecology at 509-454-7834, Relay Service 711, or TTY 877-833-6341.

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Adequate	Incomplete	Missing	N/A

	x			See III(c) above.
		x		Monitoring well logs not included.
x				
x				
x				
		x		Copies of past reports are poor quality and not readable.
		x		No site data in EIM.
x				
			x	
			x	