



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 9, 2015

Ms. Carrie Pederson
PLJA
300 Desmond Drive SE
Lacey, WA 98503

Re: Opinion on Proposed Cleanup of the following Site:

- **Site Name:** Satsop Grocery
- **Site Address:** 840 Monte-Elma Road, Satsop, WA 98541
- **Facility/Site No.:** 81424968
- **Cleanup Site ID:** 10599
- **VCP Project No.:** SW1375

Dear Ms. Pederson:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Satsop Grocery 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

Upon completion of the proposed cleanup, will further remedial action likely be necessary to clean up contamination at the Site?

NO. Ecology has determined that, upon completion of your proposed cleanup, no further remedial action will likely be 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

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 (TPH) in the gasoline-range (TPH-G) into the soil and groundwater.

- Volatile organic compounds (VOCs) into the soil and groundwater.
- TPH in the diesel-range (TPH-D) into the 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(s) associated with this Site are affected by other sites.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Total petroleum hydrocarbons (TPH) in the gasoline-range (TPH-G) into the soil and groundwater.
- Volatile organic compounds (VOCs) into the soil and groundwater.
- TPH in the diesel-range (TPH-D) into the groundwater.

Basis for the Opinion

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

1. Performance Monitoring Report, July 2013 – June 2014: Air Sparge and Soil Vapor Extraction System Satsop Grocery 840 Monte-Elma Road Satsop, WA VCP ID SW1375 by Aspect Project No. 080206 of Dec 1, 2014

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

Analysis of the Cleanup

Ecology has concluded that, upon completion of your proposed cleanup, **no further remedial action** will likely be 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.

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.

Cleanup Levels:

MTCA Method A for soils and groundwater for unrestricted land use and the protection of drinking water beneficial uses.

Points of Compliance:

Soil: For protection from direct contact, from ground level to a depth of 15 feet

Soil to Groundwater Pathway: Throughout the site

Groundwater: For the protection of drinking water, extending vertically from the uppermost level of the saturated zone to the lowest most depth potentially affected by site contamination

Indoor Air: From soil and groundwater to the top of the saturated zone.

3. Selection of cleanup action.

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

- Air Sparge and Soil Vapor Extraction System
- Performance Results of Pilot Test

Limitations of the Opinion

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 proposed will be substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

4. 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).

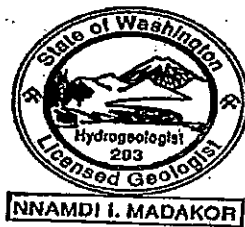
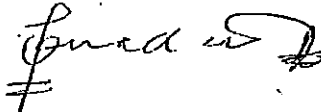
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Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at 360-407-7244 or e-mail at nmad461@ecy.wa.gov.

Sincerely,



Nnamdi Madakor P.H.G., P.G., VCP Statewide Coordinator
HQ – VCP Policy & Technical Manager
Toxic Cleanup Program

Enclosures:

1. A-site description (VCP opinion letter SW1225 October 16, 2012)
2. Figure 8 (RI/FFS August 12, 2011)
3. Figure 9 (RI/FFS August 12, 2011)

cc: Brett Carp, Aspect Consulting (email only)
Annica Brown, Vertex (email only)
Dolores Mitchell, Ecy (email only)
Kim Davis, Ecy (email only)

Site Description

Media of Concern: Soil, Soil Vapor Pathway, and Groundwater

The Satsop Grocery (Site) is located at 840 Monte-Elba Road, Satsop, Grays Harbor County, Washington (see Figure 1). The grocery store and automotive refueling operation is comprised of two parcels. The Site and surrounding parcels are both commercial and residential. Monte-Elba Road borders the Site to the north, a vacant lot and Fourth Street borders to the east, residential properties border the Site to the south and west. A commercial property borders the Site on the west also. Residential and commercial parcels are down gradient (west) of the identified soil and groundwater-contamination source areas. Approximately one-half of the 0.34-acre Site is covered by building and the other half is covered by asphalt pavement, with the affected area underlying the pavement in the northern end of the parcel; the area up-gradient of the source is covered by gravel. The Grays Harbor County Assessor's Office¹ (GHAO) notes the Site as being comprised of two separate parcels with the affected parcels having an assigned tax parcel number of 775000100201 and 775000100301.

The GHAO notes the legal description for the parcels as follows:

- 775000100201
SATSOP MARIS R 25- OF LOT 2 BLK 1
- 775000100301
SATSOP MARIS WLY 25- OF LOT 2 E 20- OF LOT 3 BLK 1

Land Use Codes for the Site are:

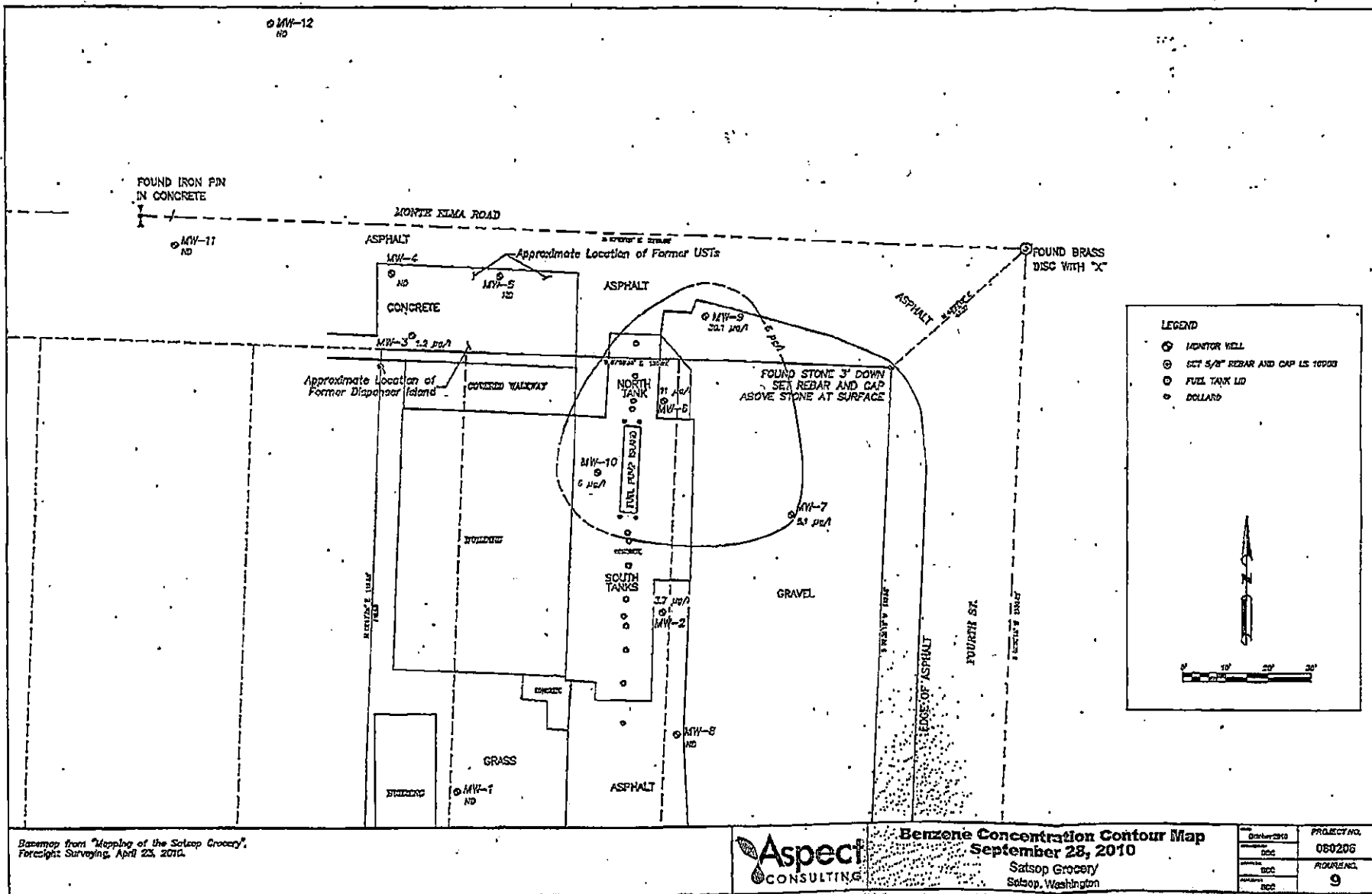
- 55- Retail Trade – Automotive, Marine Craft, Aircraft, & Accessories - Gas Stations, and
- 54- Retail Trade – Food, respectively.

Previous investigations have attributed the Site soil and groundwater contamination to historic discharge(s) of gasoline into the surrounding soil. The Site is approximately 40 feet above sea level. Groundwater ranges from 16 feet to 20 feet below ground surface (bgs) and the gradient is generally shallow and flows to the west-southwest (see Figure 4 [2010]). No water supply wells were reported within 0.5 miles of the Site.

The United States Department of Agriculture, Natural Resources Conservation Service (NRCS) website² identifies the Site soil as Carstairs very gravelly loam. The Carstairs is described as being located on outwash terraces on one to eight percent slopes, being derived from gravelly glacial outwash parent material, and being somewhat excessively drained. The typical profile for the Carstairs is 0 to 14 inches - very gravelly medial loam, 14 to 28 inches - extremely gravelly loamy sand, and 28 to 60 inches - extremely gravelly sand. Boring logs from the Site investigations indicate the Site is underlain by silty coarse sand down to a depth of 10 to 15 feet bgs, then silty sand below the silty coarse sands.

¹ <http://www.ghc-gis.org/Info/GIS/mapping.html>

² <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>



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