



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

April 21, 2010

Ms. Kelle Davis
Montesano Farm & Home
412 Main Street
Montesano, WA 98563

Re: No Further Action at the following Site:

- **Site Name:** Montesano Farm & Home
- **Site Address:** 412 Main Street, Montesano, WA 98563
- **Facility/Site No.:** 31164291
- **VCP Project No.:** SW0587

Dear Ms. Davis:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Montesano Farm & Home 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

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 dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

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 release:



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- Diesel-range total petroleum hydrocarbons (TPH-Dx) into the Soil and Ground Water.

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

Please note the Tonys Short Stop facility (# 97193494) and the Whitneys Chevrolet Inc. facility (#36813164) also affect parcel(s) of real property associated with this Site. This opinion does not apply to any contamination associated with the Tonys Short Stop and Whitneys Chevrolet Inc., facilities. Gasoline, benzene, toluene, ethylbenzene, and xylene (BTEX) contaminated groundwater, above MTCA Method A cleanup levels, originating from both Tony's Short Stop and Whitneys Chev Inc., are migrating onto the Montesano Farm and Home Site; however, recent groundwater data shows that these plumes are not commingled with the area surrounding the former heating oil underground storage tank (UST) on the Montesano Farm and Home Site.

Basis for the Opinion

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

1. Underground Storage Tank Characterization Report, AA Enviro Assessment, Inc., March 1999.
2. Site Characterization Report, Associated Environmental Group, LLC (AEG), November 2003.
3. Site Characterization Report, AEG, February 2004.
4. Groundwater Monitoring Report, AEG, September 2004.
5. Work Plan, Phase III Site Remediation, AEG, October 2004.
6. UST Removal and Remediation Report, Entrix, Inc., November 2005.
7. Groundwater Monitoring Report, Entrix, Inc., December 2005.
8. Modified Phase II Report, Entrix, Inc., January 2006.
9. Ecology TCP Site files.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at 360-407-6365.

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 **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 below and in **Enclosure A**.

The Site is located at 412 South Main Street, Montesano, Grays Harbor County, Washington and consists of an agricultural supply, hardware store with attached warehouse, and a retail fuel station. A historical drawing indicated the presence of an abandoned 600-gallon heating oil UST near the northeast corner of the building.

On January 20, 2004, soil samples were collected from eleven borings on the Site. Groundwater was encountered during drilling activities between 7 and 8 feet below ground surface (bgs). Soil contamination was identified east, south, and west of the current UST nest above current MTCA Method-A Cleanup Levels. The approximate vertical profile of the contamination extended from 4 to 12 feet bgs. The extent of TPH-Dx contamination associated with the removed heating oil UST was confined to the soils in front of the loading dock and soils below the loading dock that were not removed. Based on the contaminated soil left in place below the loading dock, soil sampling was performed on August 29, 2005. Four borings were placed; three along the dock and one inside the warehouse, to sample soils beneath the dock and building. One boring, DD2, located downgradient and closest to the excavation had a MTCA Method A exceedance for TPH-Dx of 2,280 milligrams per kilogram (mg/kg) at 16 feet bgs. All other samples were non-detect. On August 24, 2005, two monitoring wells were installed downgradient of the excavation and the previous soil borings, inside the warehouse. Wells were screened across the expected top of groundwater elevation. Samples of groundwater from the two new wells were non-detect for gasoline-range total petroleum hydrocarbons (TPH-Gx), BTEX, and TPH-Dx.

2. Establishment of cleanup standards.

a. Cleanup levels.

The Site is an agricultural supply, hardware store with attached warehouse, and a retail fuel station in a generally commercial neighborhood. Site soils and groundwater were evaluated against the MTCA Method A Cleanup Levels for unrestricted land use.

b. Points of Compliance.

Standard points of compliance have been established for the Site. The point of compliance for protection of groundwater will be established in the soils throughout the Site. For soil cleanup levels based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the point of compliance shall be established in the soils throughout the Site from the ground surface to 15 feet bgs. In addition, the point of compliance for the groundwater is established 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 the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The cleanup action selected for the Site was removal of the heating oil UST, associated plumbing, and the excavation and off-Site disposal of contaminated soil. Groundwater wells were also installed and samples were collected to determine if impacts to the groundwater were present.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site. This determination is dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

Cleanup of TPH-Dx-contaminated soil entailed removal of approximately 377 tons of material (including overburden). Limits of the excavation were determined by field observations (visual and olfactory) and quick turnaround laboratory analyses of soil

samples from the excavation sidewalls and base. Where accessible, the excavation was over-excavated approximately 0.5 to 2 feet. The south wall of the excavation went under the building's loading dock, so excavation was halted in that direction, leaving a band of contaminated soil under the loading dock. Two monitoring wells were installed downgradient of the excavation inside the warehouse. During drilling, additional soil samples were obtained; all were non-detect for TPH-Dx and heavy and mineral oil range hydrocarbons. Samples of groundwater from the two new wells were non-detect for TPH-Dx.

A restrictive covenant has been filed with the county and includes groundwater use restrictions, and requirements for notification of Ecology regarding Site use or ownership changes.

Post-Cleanup Controls and Monitoring

Post-cleanup controls and monitoring are remedial actions performed after the cleanup to maintain compliance with cleanup standards. This opinion is dependent on the continued performance and effectiveness of the following:

1. Compliance with institutional controls.

Institutional controls prohibit or limit activities that may interfere with the integrity of engineered controls or result in exposure to hazardous substances. The following institutional control is necessary at the Site:

- TPH-Dx impacted soils remain underneath the loading dock on the Site. These soils are isolated and are not impacting groundwater on the Site. Due to the non-mobile nature of the contaminant (TPH-Dx), the limited volume remaining in place, the low potential for leaching since it's beneath the dock, and the lack of groundwater contamination, a long-term groundwater monitoring plan was determined to not be required.

Ecology is to be notified if any construction occurs on the loading dock that may encounter the remaining impacted soils or groundwater in the immediate vicinity, or if Site use or ownership changes.

To implement that control, an Environmental Covenant has been recorded on the following parcel of real property in Grays Harbor County:

- #075300100100.

Ecology approved the recorded Covenant. A copy of the Covenant is included in **Enclosure B.**

Periodic Review of Post-Cleanup Conditions

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to ensure that they remain protective of human health and the environment. If Ecology determines, based on a periodic review, that further remedial action is necessary at the Site, then Ecology will withdraw this opinion.

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List and Leaking Underground Storage Tank List.

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 performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

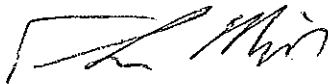
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW0587).

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 or the termination of the Agreement, please contact me by phone at 360-407-7263 or e-mail at tmid461@ecy.wa.gov.

Sincerely,



Thomas Middleton L.Hg.
SWRO Toxics Cleanup Program

TMM/ksc:Montesano Farm and home site NFA

Enclosures: A – Description and Diagrams of the Site
 Figure 1 – Entrix Site Map
 Figure 3 – Entrix Site Plan and Groundwater Elevation Contour Map
 B – Environmental Covenants for Institutional Controls]

By certified mail: (7009 1410 0002 4420 3670)

cc: Matthew Loxterman, ENVIRON International Corp
 Paul Turner - Ecology
 Scott Rose, Ecology
 Dolores Mitchell – Ecology