



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 15, 2012

Mr. Thom Morin
Environmental Partners, Inc.
295 NE Gilman Blvd, Suite 201
Issaquah, WA 98027-2906

Re: No Further Action at the Following Site:

- **Site Name:** Northwest Pipeline Snohomish MS
- **Site Address:** 13931 SR2, Monroe WA 98290
- **Facility/Site No.:** 2778
- **VCP Project No.:** NW1440

Dear Mr. Morin:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Northwest Pipeline Snohomish MS 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 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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- Mercury into the Soil.

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.

Basis for the Opinion

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

1. Snohomish Meter Station Final Remedial Action Report, dated August 20, 2007, prepared by Environmental Partners Inc.

Those documents 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) 649-7239.

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 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.

The cleanup standard used was MTCA Method A for Unrestricted Land Use.

3. Selection of cleanup action.

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

The selected cleanup action was excavation and off-site disposal of all contaminated soil.

4. Cleanup.

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

Remedial excavation was initiated on November 12, 2005, and completed at the subject facility/location on November 18, 2005. Remedial excavation was performed using manual and mechanical excavation methods as these methods were deemed the most appropriate and effective due to the large size of the excavation and the open access.

A total of 148.5 tons of soil were removed from the Snohomish M/S during this remedial action. A total of 123 tons of soil were handled and disposed as non-hazardous and non-dangerous waste and 25.5 tons were handled and disposed as WTO2 classified waste. Excavated soils were placed in one cubic yard tyvek "supersacks", labeled and stored on-site pending disposal.

A total of 43 performance samples (39 samples and four duplicate samples) were collected from the limits of the remedial excavation. The total mercury concentrations in those samples ranged from 0.03 to 2.9 mg/kg.

As allowed in *Statistical Guidance for Ecology Project Managers*, the dataset was analyzed using nonparametric statistical methods. Using this method the one-sided upper 95 percent confidence interval (i.e., UCL95) is 1.74 mg/kg. As a method of comparison the *Statistical Guidance for Ecology Project Managers* also allows the use of a Z-statistic for calculation of the UCL95 for data which are neither normally nor lognormally distributed. Using this method the UCL95 around the true mean is 0.657 mg/kg. Since the dataset also approximates the requirements for a lognormal distribution, a further check utilized Land's Method to determine the UCL95 using this distribution. The use of Land's Method resulted in a UCL95 of 0.877 mg/kg. Each of these methods results in a UCL95 which is less than the 2.0 mg/kg cleanup level for mercury in soil. Based upon these performance sampling data, the Snohomish M/S is currently in compliance with the MTCA Method A Soil Cleanup Level for Unrestricted Land Uses for Mercury of 2.0 mg/kg. **Therefore Ecology's opinion is that No Further Remedial action is required at this Site.**

A total of 123 tons of non-hazardous and non-dangerous soil were transported to the Philip Services Corporation facility in Kent, Washington under Profile Number 349502 prior to ultimate disposal at Waste Management's Columbia Ridge, Oregon Subtitle D facility via the Alaska Street transfer station, Seattle, Washington. The 25.5 tons of soil classified as WTO2 were transported to the Philip Services Corporation facility in Kent, Washington under Profile Number 349776 prior to ultimate disposal at US Ecology's Grand View, Idaho Subtitle C landfill.

Listing of the Site

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

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liabe 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).

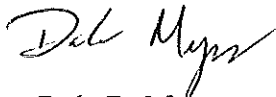
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Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW1440).

For more information about the VCP and the cleanup process, please visit our website: 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) 649-4446 or e-mail at damy461@ecy.wa.gov.

Sincerely,



Dale R. Myers
Site Manager
Toxics Cleanup Program

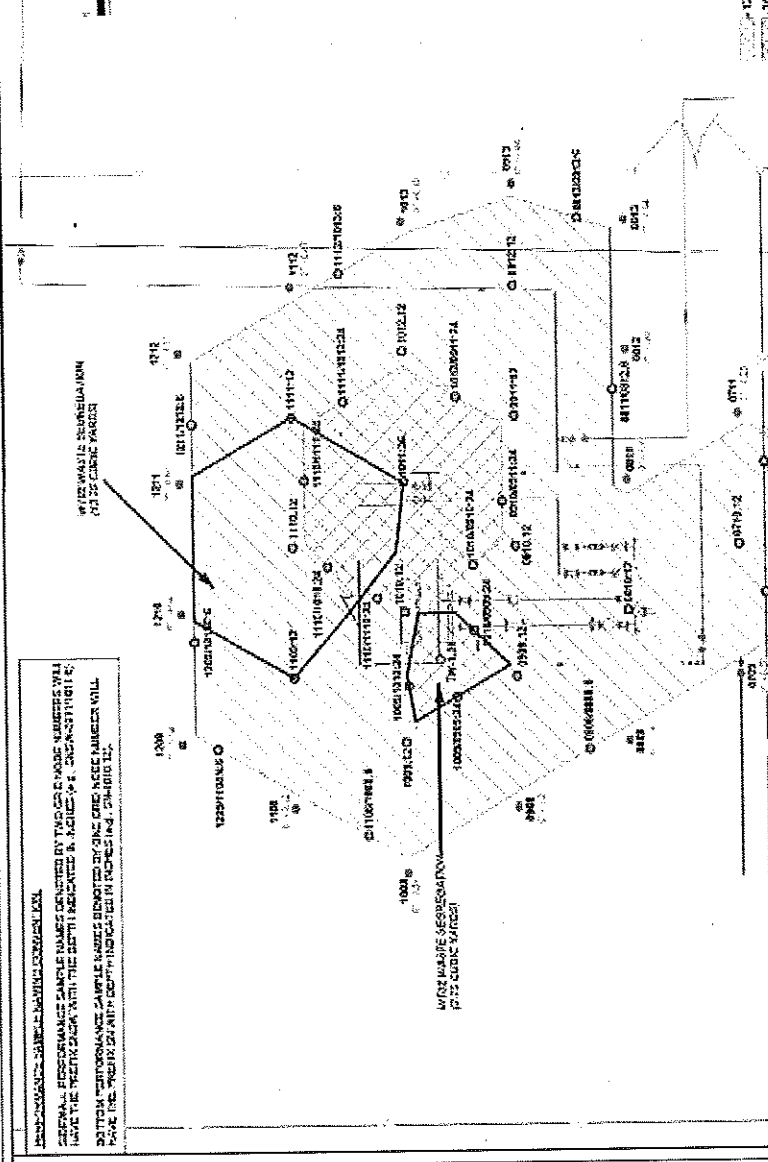
Enclosures (1): A – Description and Diagrams of the Site

Enclosure A

Description and Diagrams of the Site

This facility consists of a meter station and associated heater within a fenced and locked enclosure. The facility formerly used a positive displacement meter, which did not contain mercury, and there are three thermowells on-site. The meters were located over a soil and gravel surface inside of a 6-foot by 8-foot building. The Snohomish M/S underwent site assessment and remediation in both 1990 and 1992. It should be noted that there is a customer meter station (Puget Sound Energy) located south of the Snohomish M/S on customer-owned property and away from the construction workspace area. NWP did not assess customer-owned and operated property.





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		PROJECT PROJECT NO. 1
PREPARED FOR NORTHWEST PIPELINE PARTNERS	LOCATION 1201 STATE ROUTE 2 SACKLEBURG, VIRGINIA	DATE 08/20/03
CLIENT ENVIRONMENTAL PARTNERS INC.	DESIGNED BY J. J. JONES	REVISIONS 01/01/03
FIGURE SNRMS-3 PROPOSED REMEDIAL AREA PLAN SNORRISH METER STATION		

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