



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

June 15, 2004

Ms. Gina T. Gobo
City of Bellingham Parks & Recreation
3424 Meridian Street
Bellingham, WA 98225

Dear Ms. Gobo:

Re: Independent Remedial Action
Exxon Mobil Oil Corporation (Alternative name Taylor Ave. Dock Uplands)
908 10th Street, Bellingham WA 98225

Thank you for submitting the results of your independent remedial actions for review by the State of Washington Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Exxon Mobil Oil Corporation (Alternative name Taylor Ave. Dock Uplands) facility located at 908 10th Street, Bellingham WA:

1. Letter "Request for Taylor Avenue Site Delisting – Ecology Facility Site ID No. 34619691 (Exxon Mobile Oil Corp Site)" by Gina Gobo of the City of Bellingham Parks and Recreation Department (the City) dated June 11, 2004,
2. "Data Report, Taylor Avenue Supplemental Soil Characterization" by Anchor Environmental dated March 1, 2004,
3. "Work Plan/Sampling and Analysis Plan, Taylor Avenue Supplemental Soil Characterization" by Anchor Environmental dated December 12, 2003,
4. "Site Hazard Assessment Summary Score Sheet and Soil sample data results" by Whatcom Health Department,
5. "Phase II Environmental Site Assessment: Bellingham Parks & Recreation 10th Street & Taylor Avenue Site" by Accord Environmental dated May 19, 1997,
6. "Phase I – Preliminary Report of Findings/Environmental Audit 10th and Taylor by Ebasco dated May 1992,
7. "Independent Remedial Action Report, McEvoy Parcel, 10th Street & Bennett Avenue 804 10th Street" by Accord Environmental dated January 31, 1996.

The reports listed above will be kept in the Central Files of the Northwest Regional Office (NWRO) of Ecology for review by appointment only. Appointments can be made by calling

Exxon Mobile Oil Corporation

Page 2

Central Records at the NWRO at (425) 649-7190 or -7239.

The subject site includes two parcels North Parcel (North of the Taylor Avenue) and South Parcel (South of the Taylor Avenue, Former Exxon Mobile Oil Company site). (See the attached map).

Mrs. Gina Gobo of the City summarized cleanup activities taken at the site since 1992 in the letter dated June 11, 2004. Ecology understands that the City conducted independent cleanups which includes removing aboveground storage tanks, storage building, pipes and valves, and an underground septic tank. The data presented in the Phase II Environmental Site Assessment report by Accord Environmental show that TPH up to 10,000ppm was found near a former septic tank area, and TPH up to 6200ppm was found near a former loading pad area. The City was reported to have conducted independent soil excavation to remove the TPH contaminated soil and stock pile the soil on site. The stockpile later was aerated and mixed with clean material and spread out onto the South Parcel. However, the City did not take any confirmational soil samples during the independent cleanups and did not produce any technical report to record the independent cleanups.

In 2003, Whatcom County Health Department collected 5 subsurface soil samples at the site. The samples show no TPH contamination. However, the sample results indicate that the concentrations of cadmium and cPAHs are slightly over the MTCA cleanup levels. County Health Department ranked the site No. 5 (No. 1 as the highest contaminated site and N0.5 the lowest) and placed the site on Ecology's Hazardous Sites List. Subsequently, in 2004 the City collected additional 5 soil samples at approximately the same locations where the County Health Department collected its soil samples. The City used a different laboratory method and collected larger volume of soil core samples. The data results from the City's sampling event show no TPH, cadmium and cPAHs contamination. Based on the information above, Ecology has determined that, at this time, the release of TPH, cadmium, and cPAHs into the soil no longer poses a threat to human health or the environment.

Therefore, Ecology is issuing this determination that no further remedial action is necessary at this site under MTCA, chapter 70.105D RCW. However, please note that because your actions were not conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(i) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

Ecology's no further action determination is made only with respect to the release identified in the reports listed above. This no further action determination applies only to the area of the property affected by the release identified in the report at 908 10th Street, Bellingham, WA. It does not apply to any other release or potential release at the property, any other areas on the property, nor any other properties owned or operated by the City of Bellingham

Ecology will update its database to reflect this "No Further Action" determination. Your site will not appear in future publications of the Confirmed & Suspected Contaminated Sites Report (previously known as the Affected Media and Contaminants Report.) Ecology will also initiate

Exxon Mobile Oil Corporation

Page 3

the process to remove your site from the Hazardous Sites List. This process includes a thirty (30) day public comment period, after which Ecology must evaluate the public's comments before making a final decision.

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 determination.

If you have any questions, please contact Sunny Lin Becker at (425) 649-7187.

Sincerely,

A handwritten signature in black ink, appearing to read "Sunny Lin Becker", with a stylized, flowing script.

Sunny Lin Becker, P.E.
Toxics Cleanup Program

