

January 17, 2019

Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
300 Desmond Drive
Lacey, Washington 98504

Attention: Mr. Timothy Mullin, L.G.

Re: **Request for No Further Action Using Model Remedies**
14610 Purdy Dr. NW
Gig Harbor, Washington 98332
Facility/Site No.: 11876
Cleanup Site No.: 1952
VCP Project No.: SW1590

Mr. Mullin:

On January 14, 2019, EcoCon Inc. (ECI) submitted to Ecology, both by e-mail and regular mail, a letter requesting a “*No Further Action*” determination along with a Quarterly Groundwater-monitoring Report for the Gig Harbor Transmission Site (VCP Project Number SW1590). You acknowledged receipt of that letter via two emails dated January 15, 2019.

In the first e-mail you indicated that we needed to update the information in the Ecology EIM database and in the second e-mail you indicated that you thought that the Site may be able to be closed using Remedy #1 from Ecology’s *Model Remedies for Sites with Petroleum Impacts to Groundwater* (August, 2016) or possibly Ecology’s *Model Remedies for Sites with Petroleum Contaminated Soils* (September, 2015).

ECI has entered the most recent information into the Ecology EIM database and received notification from Ms. Susan Pool that it was accepted on January 17, 2019. You also acknowledged receipt of the EIM data and that it was approved by you in an email dated January 17, 2019.

ECI has reviewed the Ecology Model Remedy guidance documents and agrees that a model remedy is appropriate for the Gig Harbor Transmission Site. This site had soil contaminated with hydrocarbons that was excavated and disposed of at an appropriate facility. Confirmation samples indicated that the MTCA Method A cleanup levels had been achieved in the soil.

A grab sample of water obtained during the site investigation revealed the presence of lead above the MTCA Method A cleanup levels for groundwater in the water from one of the temporary soil borings at the Site. ECI indicated that the result was considered anomalous since it was from a temporary well. However, Ecology indicated in a September 27, 2017 letter that they wanted a permanent well installed

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and the groundwater monitored for at least four quarters to show that the results of the sample from the temporary well was anomalous.

ECI installed a monitoring well at the location of the former soil boring and monitored the groundwater for four consecutive quarters during which the analytical results did not reveal the contaminants of concern above the laboratory detection limits. Based on this ECI concluded that the groundwater had not been impacted by the petroleum releases at the Site.

Based on our review of the documents, and the results of the groundwater monitoring, it is our opinion that the Model Remedy #1 from the *Model Remedies for Sites with Petroleum Impacts to Groundwater* is appropriate for this Site. According to the Ecology guidance this Model Remedy is for:

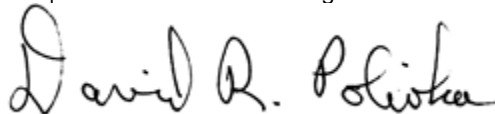
“...situations where the selected remedial action results in the Method A groundwater cleanup levels and the Method A soil cleanup levels for unrestricted land use being met throughout the site. Following remediation, sufficient confirmation sampling and post-remedial monitoring would be necessary to document compliance with these cleanup levels.”

Ecology also indicated that if the conditions for use of this Model Remedy are met, then an “Environmental Covenant” would be necessary.

This Site meets the conditions set out by the Model Remedy. The soils at the Site meet the MTCA Method A cleanup levels for unrestricted land use, and the groundwater has been shown to meet the Method A groundwater cleanup levels. Therefore, ECI is requesting that Ecology issue a “No Further Action” determination using Ecology’s Model Remedy #1 from the August, 2016 guidance *Model Remedies for Sites with Petroleum Impacts to Groundwater*.

If there are any questions or you wish to discuss this or any other matter regarding the Site, please do not hesitate to call.

Sincerely,
ECI | Environmental Consulting



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Senior Hydrogeologist
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