



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

June 28, 2019

Kyler Sisson  
Rainier Plastics  
1101 Ledwich Ave  
Yakima, WA 98902

**Re: No Further Action (NFA) Determination for:**

- **Site Name:** Rainier Plastics
- **Site Address:** 1101 Ledwich Avenue, Yakima
- **Facility/Site No.:** 455
- **Cleanup Site ID No.:** 3754

Dear Kyler Sisson:

The Department of Ecology (Ecology) has reviewed existing file documents for the above-referenced cleanup site. The following is our opinion, based on that review.

**Issue Presented and Opinion**

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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**

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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:

- Tetrachloroethene (PCE) into groundwater.



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The Site was identified in 1987-1988 when U.S. EPA's contractor, Ecology and Environment, conducted Site Inspections. In a Site Inspection letter dated August 13, 1987, drums were noted to be stored on-site on asphalt in an un-bermed area (no secondary containment). The drums were identified to contain alcohol solvents and ink. The alcohol solvent was identified as n-propyl alcohol.

A water well and injection well system used for process cooling was also identified. The water well and process discharge were sampled in 1988 as reported in "Site Inspection Report", prepared by Ecology and Environment and dated March 1988. Both the water well and the discharge contained Tetrachloroethene (PCE) at 16 µg/L, above the drinking water standard of 5 µg/L. However, the PCE was concluded to originate from an off-site source since this compound was not used onsite and was also detected in offsite wells.

A Site Hazard Assessment (SHA) was conducted in 1991 as reported in a letter dated August 16, 1991. The SHA resulted in a ranking of 3 on a scale of 1 to 5; however, the SHA stated that two EPA consultants had concluded the PCE was from an off-site source.

**Enclosure A** presents a map showing the location of the site.

### **Basis for the Opinion**

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

1. Letter from Department of Ecology to Rainier Plastics Company, regarding Site Hazard Ranking, dated August 16, 1991.

This document is kept at the Central Regional Office of Ecology (CRO) for review by appointment only. You can make an appointment by calling the CRO resource contact at (509) 575-2490 or emailing [RecordsOfficer@ecy.wa.gov](mailto:RecordsOfficer@ecy.wa.gov).

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

### **Analysis of the Cleanup**

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Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site.

The conclusion that no further remedial action is necessary is based on the following analysis:

**1. Characterization of the Site.**

Ecology has determined that characterization of the Site is sufficient to establish cleanup standards and determine appropriate cleanup actions. Ecology visited the Site on September 27, 2017. The president of the company, Kyler Sisson, confirmed that PCE was currently not and historically was not a part of their process and that reinjection of groundwater was not part of their current process (this process was discontinued in 1992 as documented in a letter from Shields Bag and Printing dated March 25, 1992). Drums stored onsite contain n-propyl alcohol (aka 1-propanol) from the Shield Plastic facility to the north of Nob Hill Blvd. The n-propyl alcohol was stored onsite until periodically picked up for offsite disposal. This compound would not be expected to be a significant environmental risk due to its high vapor pressure (it would rapidly evaporate if spilled) and high degradability. In addition, this compound was not detected in any soil or groundwater samples and has relatively high non-carcinogenic Method B risk-based concentrations in Ecology's CLARC table.

**2. Establishment of cleanup standards.**

**Groundwater Cleanup Levels**

The Method A cleanup level for PCE of 5 µg/l has been selected for the Site. This concentration is the same as the Maximum Contaminant Level (MCL) for PCE in drinking water.

Point of Compliance (POC): Standard, throughout the Site.

Ecology has determined the cleanup levels and points of compliance established for the Site meet the substantive requirements of MTCA.

**3. Cleanup.**

Because the PCE that was detected in groundwater at the Site was from an offsite source, any cleanup of the PCE in groundwater should be conducted under the cleanup Site associated with the offsite source.

Based on monitoring data collected by Ecology (e.g. "Yakima Railroad Area PCE Contamination, Groundwater Quality Performance Monitoring Data Summary 2016") and at the Frank Wear Cleaners Site (FSID 444), the PCE in groundwater found at the Rainier Plastics Site in 1988 is consistent with the identified regional groundwater contamination, and is hydraulically down gradient from the Frank Wear Site.

Based on PCE concentrations in groundwater at the Frank Wear Site and groundwater flow direction data, it appears that the Frank Wear Cleaners Site is the source of the PCE contamination found in groundwater at the Rainier Plastics Site in 1988. Therefore, further action regarding the PCE in groundwater at the Site should be addressed under the Frank Wear Cleaner site.

### **Listing of the Site**

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Based on this opinion, Ecology will remove the Site from the Hazardous Sites List and the Confirmed and Suspected Contaminated Sites List. This process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdrawal this opinion.

### **Limitations**

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1. This 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 resources damages resulting from the release or releases of hazardous substances at the site. This opinion does not:
  - Change the boundaries of the site.
  - 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. This 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 address whether the actions taken at this site are substantially equivalent. Courts make that determination. See RCW 70.105D080 and WAC 173-340-545.
3. 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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If you have any questions about this opinion, please contact me phone at (509) 454-7835 or by email at Frank.Winslow@ecy.wa.gov.

Sincerely,



Frank P. Winslow, P.G.  
Site Manager  
Toxics Cleanup Program  
Central Regional Office

Enclosure (1): A - Site Location



**Enclosure A**

**Site Location**

