

DEPARTMENT OF ECOLOGY

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

July 29, 2019

Don Bellamy Klickitat County Public Works 115 South Golden Ave Goldendale, WA 98620

Re: No Further Action (NFA) Determination for:

• Site Name:

Klickitat County Road Dept. Goldendale Shop Wash Pad

• Site Address:

1181 West Broadway Street, Goldendale

• Facility Site No.:

35691825

• Cleanup Site ID No.:

3497

Dear Don Bellamy:

The Department of Ecology (Ecology) appreciates your cooperation with the above-referenced Site. As you know, environmental work was recently completed by GeoEngineers. As a result of the work completed, **Ecology has determined no further remedial action is necessary.** Please refer to the following for site history, contamination information, and data analysis regarding Ecology's determination.

In 1994, P-D Consultants (P-D) performed a site assessment near the washdown pad. A drain located near the north end of the pad discharged wash water to the ground surface. Gasoline, solvents and herbicides were reportedly discharged at the washdown pad.

Laboratory analytical results indicated volatile organic compound, including solvents, semi-volatile organic compounds, herbicides and metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver) were detected in soil near the washdown pad. P-D installed a monitoring well screened in groundwater perched on the shallow basalt. The monitoring well was located downgradient from the area where wash water was discharged. Contaminants were not detected at concentrations greater than the Model Toxics Control Act (MTCA) cleanup levels in the groundwater sample collected from this well. The report does not indicate the condition of the well after the assessment.

An above-ground 10,000-gallon heated and insulated asphalt tank was located on the property from 1969 until 2010. In 2011, the tank was cleaned and removed by Able Cleanup Technologies (Able). Contaminated soil was excavated from beneath the tank.

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The excavation proceeded to about 3 feet below ground surface (bgs), where bedrock was encountered. During the remedial excavation, about 296 tons of petroleum contaminated soil was removed from the site. Confirmation samples were collected from the excavation and submitted for chemical analysis of diesel-range petroleum hydrocarbons, oil-range petroleum hydrocarbons and polycyclic aromatic hydrocarbons. Two of the seven confirmation samples collected exceeded cleanup levels for one or more of the analyzed petroleum compounds. Groundwater was not encountered in the excavation.

In 2018, Ecology received funding through the Model Remedies Grant Program (the Grant Program) to provide additional site characterization to assist a limited number of leaking underground storage tank (LUST) sites towards closure. The intent of these proposed activities was to further characterize previously identified petroleum impacts at LUST sites still awaiting receipt of a NFA determination from Ecology. As a result, the Klickitat County Road Department site was selected to receive a portion of these funds.

To perform the proposed characterization activities funded by the Grant Program, Ecology retained GeoEngineers of Spokane, Washington. GeoEngineers subsequently coordinated and directed the advancement of four soil borings at the Site on May 6, 2019. The borings were located in the vicinity of the former wash pad, and one sample was collected from each boring and submitted for laboratory analysis. Laboratory analyses of these samples did not detect concentrations of petroleum hydrocarbons or associated constituents above their associated MTCA Method A cleanup levels (CULs). A more detailed summary of these activities is provided in the enclosed Site Summary Report.

Determination

Ecology has evaluated the results of the further characterization activities completed in May of 2019 and concluded **no further remedial action** is necessary to clean up residual petroleum hydrocarbon contamination at the Site. That conclusion is based on the following analysis:

- Removal of the original wash pad and asphalt tank, and excavation of associated contaminated soil has removed the source of petroleum hydrocarbons and related constituents beneath the Site
- Concentrations of petroleum hydrocarbons and related constituents were not detected in the soil samples, collected at the Site on May 6, 2019, above their respective MTCA Method A CULs

As a result of this information, Ecology is issuing a NFA determination for the Site using Model Remedy No. 1, as identified in Ecology's "Model Remedies for Sites with Petroleum Contaminated Soils (Publication No. 15-09-043, September 2015)."

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Under this option, it has been determined that the historic removal of contaminated soil has achieved Method A CULs beneath the Site.

This determination is based on the information contained in the Site Summary Report and associated analytical reports and documentation. Additional documents related to the reported historical release of petroleum hydrocarbons from the Site are kept at the Central Region Office of Ecology for review.

Limitations

- 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).

Contact Information

If you have any questions about this opinion, please contact me by e-mail at jeff.newschwander@ecy.wa.gov or by phone at (509)454-7842.

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Sincerely,

Jeff Newschwander

Site Manager

Toxics Cleanup Program Central Region Office

Enclosure: (1)

GeoEngineers, Inc. "Soil Assessment," dated June 28, 2019