

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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January 23, 2008

Mike Gage
President and CEO
Bonneville Conservation, Restoration & Renewal Team
23201 Northeast Pluss Road
Vancouver, Washington 98682

Re: No Further Action Determination under WAC 173-340-515(5) for the Remedial Action Unit 1 (RAU-1), Camp Bonneville Military Reservation, 23201 Northeast Pluss Road, Vancouver, Washington

Dear Mr. Gage

Thank you for your letter of November 2007, requesting for a No Further Action Determination for the Remedial Action Unit 1 of the Camp Bonneville Military Reservation facility.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at RAU-1 to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

(A) Hart Crowser, Inc., Petroleum Contaminated Soil Investigation, Former Tank No.7-CMBPN, Building No. 4475, Camp Bonneville, Vancouver, Washington, Contact No. DACA67-93-D-1004, Delivery Order No. 53, September 11, 1996.

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- (B) Woodward-Clyde Federal Services, Final Environmental Baseline Survey Report, Camp Bonneville, Washington, Contract No. DACA67-95-D-1001, January 30,1997.
- (C) Hart Crowser, Inc., Final Lead-Based Paints and Soil-Metals Survey Report, Camp Bonneville, Washington, Contract No. DACA67-93-D-1004, Delivery Order No. 49, February 28, 1997.
- (D) Hart Crowser, Inc., *Pre-Demolition Survey, CS Gas Chamber Building, Camp Bonneville, Vancouver, Washington*, Contract No. DACA67-93-D-1004, Delivery Order No. 52, February 28, 1997.
- (E) Prezant Associates, Inc., Final Asbestos Surveys Report, Camp Bonneville, Vancouver, Washington, Volumes I-III, Contract No. DACA67-95-D-1018, Delivery Order No. 4, November 7, 1997.
- (F) Cecon Corporation, *Drain Line and PCS Removal, Final Report, Camp Bonneville, Vancouver, Washington*, Contract No. DACA67-96-M-0890, December 1997.
- (G) Shannon & Wilson, Inc., Final Multi-Sites Investigation Report, Camp Bonneville, Vancouver, Washington, Volumes 1-5, Contact No.DACA67-94-D-1014, Delivery Order Numbers 10 and 17, July 1999.
- (H) URS Greiner Woodward Clyde, Final Supplemental Archive Search Report, Camp Bonneville, Vancouver, Washington, Contract No. DACA67-98-D-1005, Delivery Order No. 3, August 15, 1999.
- (I) Gary Struthers Associates, Inc., Final Closure Report, Environmental Restoration, Multi-Sites, Camp Bonneville, Washington, Contract No. DACA67-95-G-0001, Task Order 58, February 2001.
- (J) URS Greiner Woodward Clyde, BRAC HTRW Site Closure Report for Landfills1, 2, and 3; Former Burn Area; Buildings 1962 and 1963; Grease Pits at the Camp Bonneville and Camp Killpack Cantonments; Former Sewage Pond; and Hazardous Materials Accumulation Point, Camp Bonneville, Washington, Contract No. DACA67-98-D-1005, Delivery Order No. 43, September 2000.
- (K) Gary Struthers Associates, Inc., Final Closure Report, Environmental Restoration, Pesticide Building #4126 and Ammunition Bunkers #2953, #2951 and #2950, Camp Bonneville, Washington, Contract No. DACA67- 95-G-0001 T.O.58, December 2001.
- (L) Gary Struthers Associates, Inc., Final Closure Report, Environmental Restoration, Drum Burial Area, Camp Bonneville, Washington, Contract No. DACA67-95-G-0001 T.O. 58, April 2002.

(M) URS Corp., Final Cleanup Action Plan for Remedial Action Unit 1, Camp Bonneville, Vancouver, Washington, Contract No. DACA67-02-D-2003, July 2004.

Remedial Action Unit 1 (RAU 1) consists of the 20 areas at the Property identified with contaminants such as total petroleum hydrocarbons, semi-volatile organics and/or pesticides. The *Final Cleanup Action Plan for Remedial Action Unit 1* report by URS Corporation more particularly describes the site and independent remediation of any contamination associated with those areas, as well as mitigation of and any risks to human health and the environment associated with such contamination.

Based on a review of the final cleanup action report and supporting documentation listed above, Ecology has determined that the independent remedial actions conducted at the RAU-1 are sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the contamination at the Site. Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that no further remedial action is necessary at the RAU-1 under MTCA.

This opinion is based on the continued effectiveness of the institutional controls required as part of the cleanup action for the Site under WAC 173-340-440. A copy of the Restrictive Covenant filed for the property as part of the cleanup action for the RAU-1 is enclosed with this letter as Enclosure 1. If any portion of any Restrictive Covenant is violated, then this opinion will automatically be rendered null and void and further remedial action may be required at the Site.

Based on this no further action determination, Ecology will update the status of the Site on its site database to reflect this determination.

This no further action determination does not apply to any other release(s), such as munitions or potential release(s) of contaminant(s) that may impact any other portion of any property impacted by this Site, or any other property owned or operated by the Bonneville Conservation, Restoration & Renewal Team

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void and further remedial action may be required at the Site.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in successfully completing this independent cleanup. If you have any questions regarding this opinion, please contact me at 360-407-7227

Sincerely,

Ben Amoah-Forson

Toxics Cleanup Program

Enclosures:

1. Restrictive Covenants, Camp Bonneville Military Reservation Remedial Action Unit 1