



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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

April 3, 2006

Mr. Mark Nelson
Williams Gas Pipeline
2800 Post Oak Boulevard, L17
Houston, TX 77056

**Re: Partial Sufficiency and Further Action Determination under
WAC 173-340-515(5) for the following Hazardous Waste Site:**

- Name: Northwest Pipeline Corp Mt. Vernon CS
- Address:, 15498 Lange Rd., Mount Vernon, WA 98273
- Facility/Site No.: 2684
- VCP No.: NW 1528

Dear Mr. Nelson,

Thank you for submitting your independent remedial action report for the Northwest Pipeline Mt. Vernon Compressor Station facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site 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:

- 1.) Williams Northwest Pipeline Corporation, Volume 3, Mapping Supplement, Non-internet Public, Capacity Replacement Project, Exhibit F-1, November 2004
- 2.) Site Condition Summary and Sampling Plan, Mt. Vernon Compressor Station, 15498 L:ange Rd., Mount Vernon, WA 98273, Williams Gas Pipeline Co., Environmental Partners Inc. and Portnoy Environmental, December 2005
- 3.) Williams Gas Pipeline – Northwest Pipeline Companies, Summary of Remedial Actions, Report Mt. Vernon Compressor Station (Draft) March 2006, Williams Pipeline Co., Environmental Partners Inc., Portnoy Environmental, draft version submitted by email 29 Mar 06

The documents listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at 425-649-7190.

The Site is defined by the extent of contamination caused by the following release(s):

- Arsenic (As) in Soil
- Cadmium (Cd) in Soil

The Site is more particularly described in Enclosures A-G to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site 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 following release(s):**

- Arsenic (As) and cadmium (Cd) in Soil, within the construction footprint and associated areas of soil disturbance for the Capacity Replacement Project work being completed in 2006, i.e. in the vicinity of the pig receiver only;

However, the independent remedial action(s) performed at the Site are not sufficient to meet MTCA's substantive requirements for characterizing and addressing the following release(s):

- All other releases at the site located outside the construction and associated disturbance areas, including those not yet fully identified.

Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at this Site under MTCA.

The remediation of arsenic (As) and cadmium (Cd) contamination within the area identified in the attachments to this letter, and in remediation plans as AOPC 6 meets the requirements set fourth in the Williams Capacity Replacement Joint FEIS/SEIS and in State Water Quality Certifications and permits as conditions that must be met prior to commencement of construction on the Capacity Replacement Project. Williams Pipeline has agreed to complete site remedial investigation and remediation at the remainder of the site after remedial actions necessary to allow CRP construction to proceed has been completed per the written schedule submitted to Ecology.

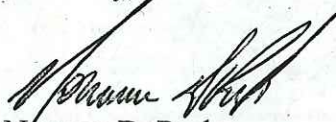
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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 conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 425-649-7047.

Sincerely,

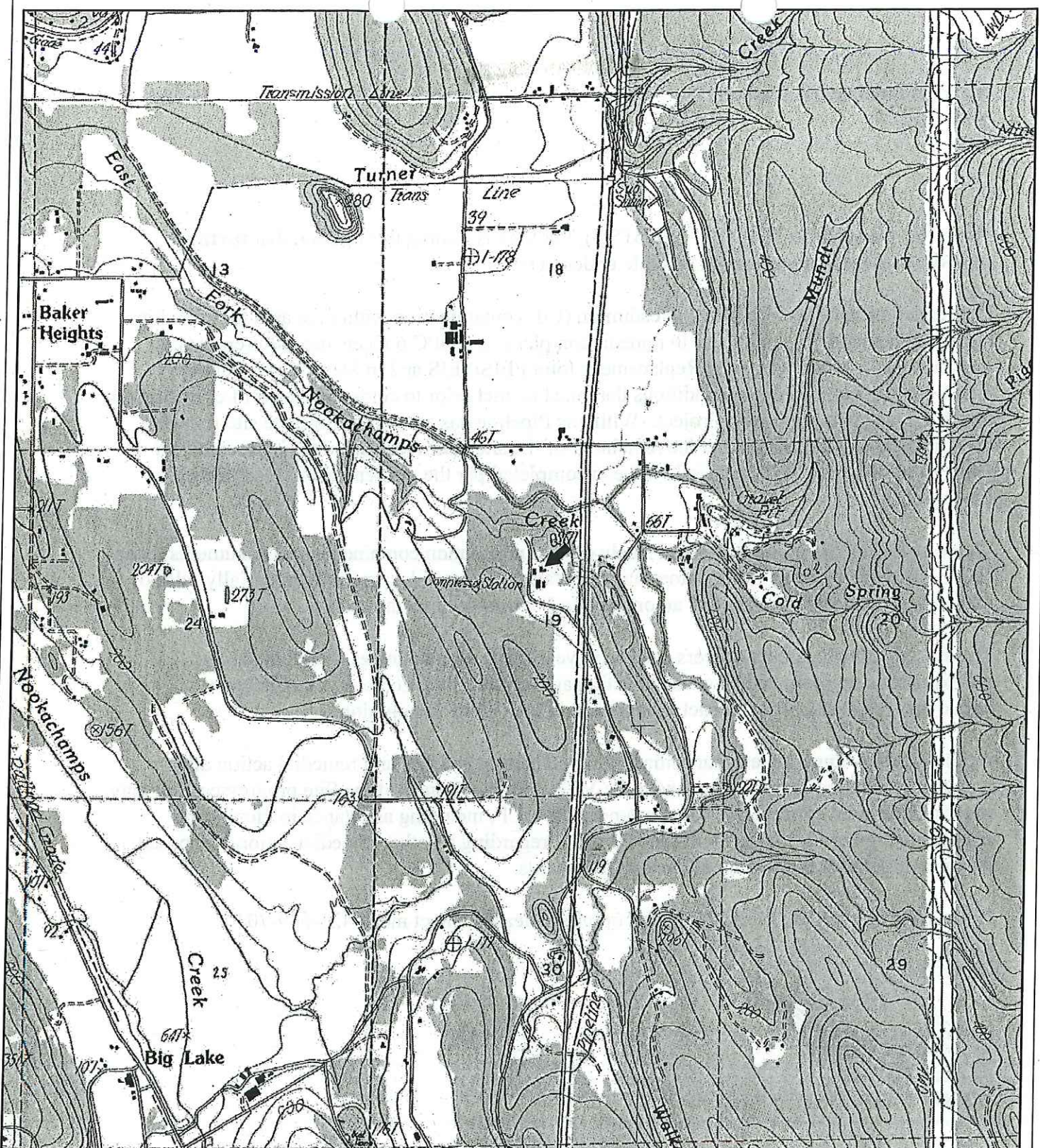


Norman D. Peck
NWRO Toxics Cleanup Program

NP:jw

Enclosures: A-D

Attachment A



KEY:



SOURCE: USGS 7.5 MINUTE QUADRANGLE
(TOPOGRAPHIC)

SEDRO-WOLLEY SOUTH, WA
1985

SCALE = 1:24,000

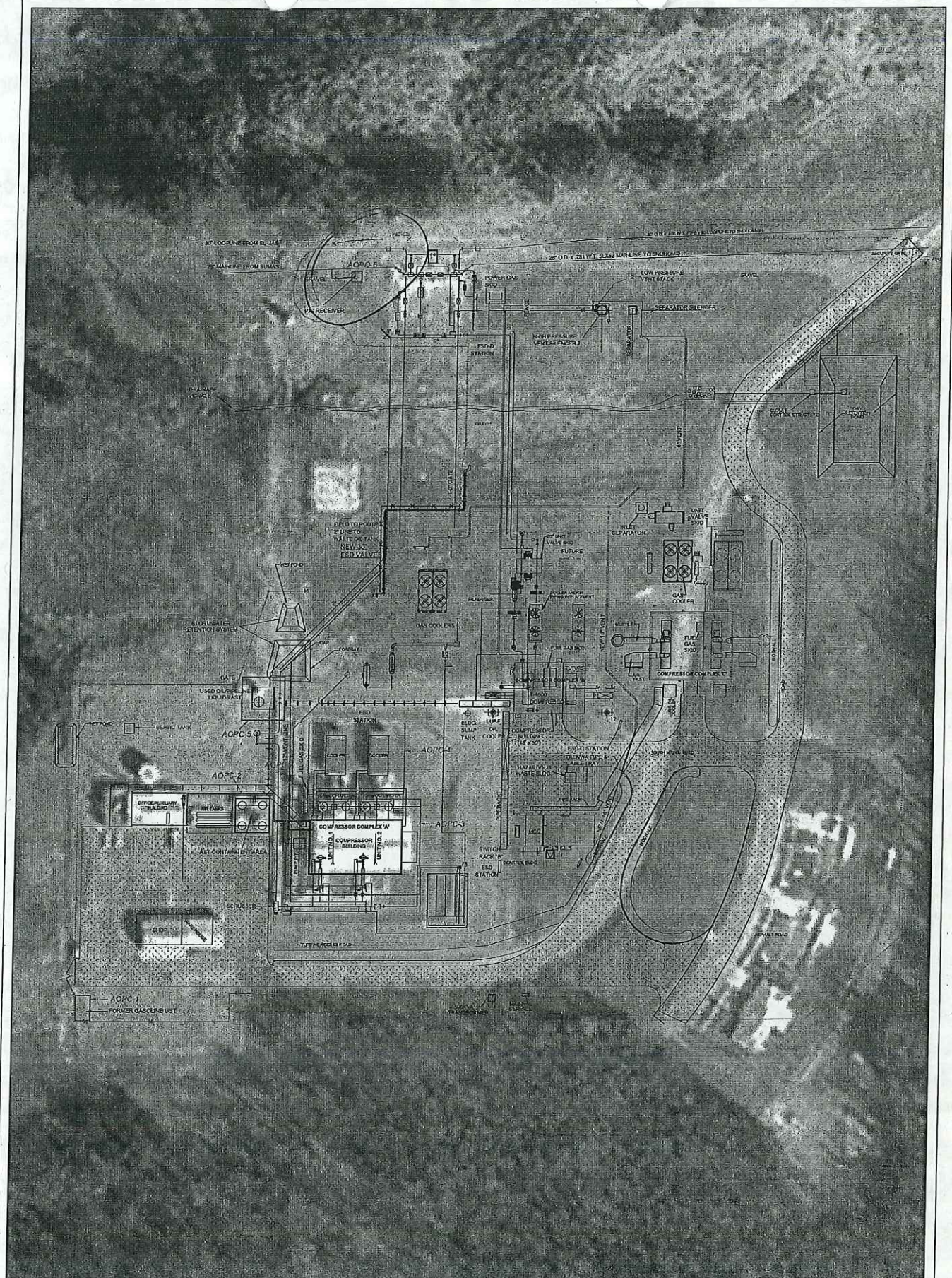


ENVIRONMENTAL
PARTNERS INC



FIGURE MVCS-1
GENERAL VICINITY MAP
MT. VERNON COMPRESSOR STATION

PROJECT	47301.4		
PREPARED FOR	NORTHWEST PIPELINE/WILLIAMS		
LOCATION	15498 LANGE ROAD MT. VERNON, WASHINGTON		
SHEET 1 of 1	DRAWN BY TJN	REVIEWED BY EMK	DATE 08/18/05



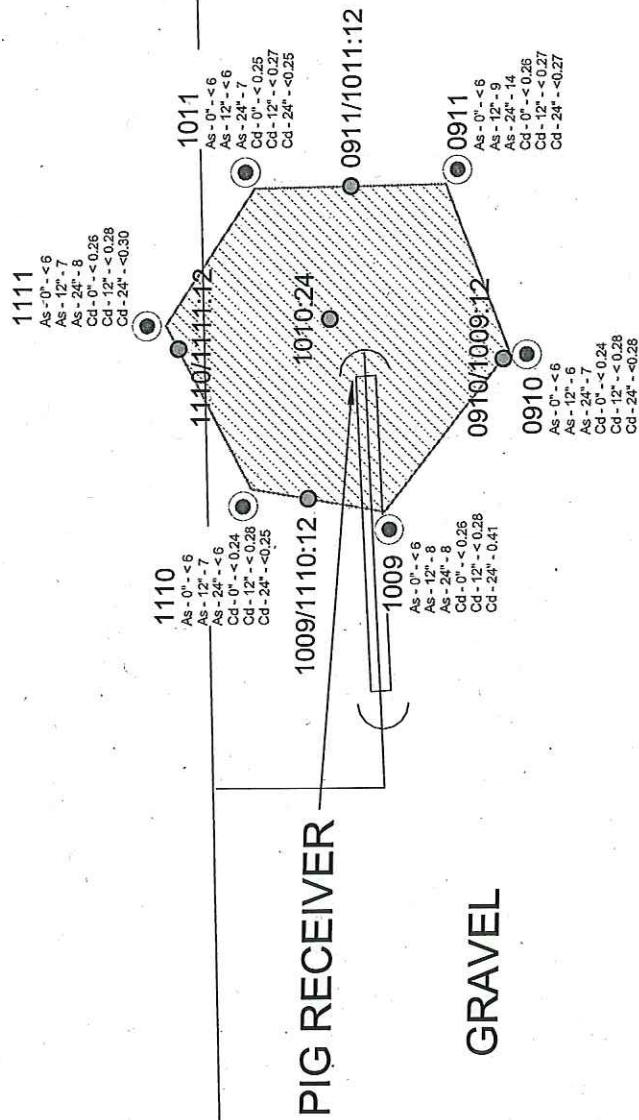
MVCS-4 AREAS OF POTENTIAL CONCERN MT. VERNON COMPRESSOR STATION				PROJECT 47301A	 ENVIRONMENTAL PARTNERS INC 		<table><tr><th>#</th><th>REV</th><th>EXPLANATION</th></tr><tr><td> </td><td> </td><td> </td></tr></table>	#	REV	EXPLANATION			
#	REV	EXPLANATION											
PREPARED FOR				NORTHWEST PIPELINE/WILLIAMS		<table><tr><th>REV</th><th>DATE</th><th>DESCRIPTION</th></tr><tr><td> </td><td> </td><td> </td></tr></table>	REV	DATE	DESCRIPTION				
REV	DATE	DESCRIPTION											
SHEET 1 of 1	DRAWN BY TJN	REVIEWED BY JLB	DATE DRAWN 12/06/05	LOCATION 15458 LANGE ROAD MT. VERNON, WASHINGTON	DATE								

Attachment D

PERFORMANCE SAMPLE NAMING CONVENTION:

SIDEWALL PERFORMANCE SAMPLE NAMES DENOTED BY TWO GRID NODE NUMBERS WILL HAVE THE PREFIX MV-SP WITH THE DEPTH INDICATED IN INCHES (e.g., MV-SP-1110/1111:6)

BOTTOM PERFORMANCE SAMPLES DENOTED BY ONE GRID NODE NUMBER WILL HAVE THE PREFIX MV WITH DEPTH INDICATED IN INCHES (e.g., MV-1010:12).



KEY:

ARSENIC AND CADMIUM RESULTS IN MG/KG

SAMPLE LOCATIONS INDICATED BY ONLY A NUMERICAL LABEL HAVE THE PREFIX MVSS (e.g., MVSS-1010).

● SURFACE SAMPLE LOCATION

○ SUBSURFACE SAMPLE LOCATION

◎ BOTH SURFACE AND SUBSURFACE SOIL SAMPLE LOCATION

GREEN - CONCENTRATION ≤ CLEANUP LEVEL

ORANGE - PROPOSED PERFORMANCE SAMPLE LOCATION

CLEANUP LEVEL
As - 20 mg/kg
Cd - 2.0 mg/kg



ENVIRONMENTAL PARTNERS INC.

FIGURE MVCS-X1
PROPOSED REMEDIAL AREA PLAN
AOPC 6
MOUNT VERNON COMPRESSOR STATION

PROJECT 47301.6

PREPARED FOR NORTHWEST PIPELINE / WILLIAMS

LOCATION 15498 LANGE ROAD
MOUNT VERNON, WASHINGTON

SHEET 1 of 1

DRAWN BY JS

REVIEWED BY EK

DATE 2/22/06