



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

August 26, 2019

Chris Brummer
King County Water and Land Resource Division
201 South Jackson Street, Suite 600
Seattle, WA 98104

**Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following
Hazardous Waste Site:**

- **Name:** Pacific City Park
- **Address:** 600 3rd Ave SE Pacific, Washington 98047
- **Facility/Site No.:** 2160
- **Cleanup Site ID:** 21
- **VCP No.:** NW3204

Dear Chris Brummer:

Thank you for submitting the documents regarding your remedial action for the Pacific City Park (Site) for review by the Washington State 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.

Issue Presented and Opinion

Does the completed Remedial Investigation meet MTCA requirements regarding Site characterization and sufficiency to support a Feasibility Study?

YES. Ecology has determined that the RI adequately characterizes the nature and extent of contamination at the Site and will enable evaluation of cleanup alternatives in the Feasibility Study.

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

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:



- Total petroleum hydrocarbons as gasoline-range organics (TPH-G), cadmium, lead, mercury, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and polychlorinated biphenyl (PCB) in soil.
- Arsenic, lead, vinyl chloride, and cPAHs in ground water.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcels associated with this Site are affected by other sites.

Basis for the Opinion

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

1. Herrera Environmental Consultants (Herrera), June 10, 2019, Supplemental Remedial Investigation Report, Pacific City Park, 600 3rd Avenue Southeast King County, Washington.
2. Herrera, January 4, 2019, Remedial Investigation Report, Pacific City Park, 600 3rd Avenue Southeast King County, Washington.
3. Herrera, February 13, 2018, Sampling and Analysis Plan, Environmental Exploration, Pacific Park/Dumpsite, Pacific, Washington.
4. Herrera, September 18, 2017, Pacific Park/Dumpsite Environmental Investigation, 600 3rd Avenue Southeast King County, Washington.
5. Shannon & Wilson Inc., May 31, 2016, Phase II Environmental Site Assessment, Pacific Right Bank Levee Setback Project, Pacific, Washington.
6. Shannon & Wilson INC., May 11, 2015, Phase I Environmental Site Assessment, Pacific City Park, Pacific, Washington.
7. King County Department of Public Health, April 30, 1985, Abandoned Landfill Study in King County.

These documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by completing a Request for Public Record form (<https://www.ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>) and emailing it to PublicRecordsOfficer@ecy.wa.gov, or contacting the Public Records Officer at 360-407-6040. A number of these documents are accessible in electronic form from the Site web page (<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=21>).

Analysis and Opinion

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and support evaluation of cleanup actions in a Feasibility Study. The Site is described above and in **Enclosure A**.

Please note that electronic submittal of all sampling data into Ecology's Environmental Information Management (EIM) database is a requirement. Suzan Pool (email suzan.pool@ecy.wa.gov, or via telephone at 360-255-5573) is Ecology's contact and resource on entering data into EIM.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance at this Site are described as follows:

Soil

Soil cleanup levels suitable for unrestricted land use are appropriate for the Site. For unrestricted land use, human direct contact and the soil-to-ground water pathway, Method A cleanup levels defined in MTCA are utilized.

In addition, the site-specific TEE cleanup levels are suitable to utilize for the COCs since the TEE standards are set to protect the terrestrial species.

The proposed Site screening levels for soil presented in Table 4 of the RI Report are appropriate as cleanup levels for the Site.

The point of compliance for direct contact with soil extends to 15 feet below ground surface (bgs), based on a reasonable maximum depth of excavation and assumed placement of excavated soils at the surface where contact occurs. Based on leaching to groundwater and the protection of surface water, the soil point of compliance is all depths, above and below the water table.

Ground Water

Method A ground water cleanup levels are appropriate for this Site, for protection of ground water as a potential drinking water source. The Site is located adjacent to surface water and Site ground water is in hydraulic connection with surface water. Therefore, cleanup levels for protection of surface water are considered when establishing ground water cleanup levels.

The proposed Site screening levels for ground water presented in Table 5 of the RI Report were established with consideration of surface water protection and are therefore appropriate as cleanup levels for the Site.

The point of compliance for ground water is throughout the Site, from the uppermost level of the saturated zone extending vertically to the lowest depth that could be affected by the Site.

Surface Water

Cleanup levels for surface water are established by consideration of applicable state and federal laws and standards, for protection of human health and aquatic life. The proposed Site screening levels for ground water presented in Table 5 of the RI Report were established with consideration of these standards and are therefore appropriate as cleanup levels for the Site.

The point of compliance for surface water is the point at which hazardous substances are released to waters of the state.

3. Selection of cleanup action.

In accordance with the Supplemental RI report (June 10, 2019), you are going to perform a feasibility study (FS) in the near future. The purposes of the FS are to select a preferred cleanup alternative and prepare for a site cleanup action plan (CAP).

Limitations of the Opinion

1. 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 resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- 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. 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 determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

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

Chris Brummer
August 26, 2019
Page 5

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (425) 649-7126 or e-mail at grant.yang@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant Yang", with a long horizontal flourish extending to the right.

Grant Yang
Site Manager
NWRO Toxics Cleanup Program

Enclosures (1) : A - Site Description and Site Diagrams

cc: Monica Walker, King County Water and Land Resources Division (via e-mail)
Sonia Fernandez, VCP Coordinator, Ecology (via e-mail)

Enclosure A

Site Description and Diagrams

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms part of the basis for the opinion expressed in the letter.

Site: The Site is located at 600 Third Avenue Southeast in Pacific, Washington (Property) (Figure 1). Identified contaminants of concern (COCs) consist of TPH-G, cadmium, lead, mercury, cPAHs and PCB in soil; and arsenic, lead, VC and cPAHs in ground water. The Property covers King County tax parcel number 3621049040.

Area and Property Description: The Site occupies approximately 21 acres and is owned by King County and currently leased by City of Pacific for use as a city park (Figure 1).

Property History and Current Use: Based on the historical aerial photos and documents, the Property was used as a dumping ground between 1931 and 1965. Removal of the municipal wastes and filled materials was initiated in the late 1960's. The Property was transferred to a city park in approximately 1980, and has been kept as the same land-use category by the city since.

Sources of Contamination: The remedial investigations revealed that contamination present in the soil and ground water at this Site originated from the historical dumping activities. The dumped materials varied from the municipal waste, debris and dredging sediments of the White River.

Physiographic Setting: The Site is located in the Puget Sound Lowland, which is characterized as a broad, low-lying region situated between the Cascade Range to the east and the Olympic Mountains and Willapa Hills to the west. The surface of the Property is relatively level surface and with a slight gradient toward the southwest.

Surface/Storm Water System: The closest surface water body to the Site is White River, which is immediately next to the Property to the west. Storm water runoff infiltrates to the ground or flows into the storm water drainage system located along the northern and western boundaries of the Site.

Ecological Setting: The Site is surrounded by residential houses, streets and paved areas to the north and west, and White River to the east. As a city park with a large open space, the urban environment allows wildlife for feeding on plants, earthworms, insects, or other food sources in or on the soil.

Geology: The Site is underlain by 2 to 20 feet of fill over native fluvial deposits (loose, unsorted and organic-rich silts, sands, and gravels), to depths of at least 60 feet below the ground surface (bgs). The fill materials consist of silt, sand, and gravel mixed with fragments of glass, brick,

cement, wood, paper, metals and rubber.

Ground Water: Ground water is encountered at shallow depths at the Site. The depth to ground water observed in Site monitoring wells ranges from 0.3 feet to 7.6 feet bgs. The ground water flow direction is generally to west and southwest and fluctuates with river stage. Seasonal ground water flow maps indicate that the White River is losing water into the shallow aquifer upstream of the Site and that ground water migrates parallel to, or away from, the White River in the vicinity of the Site.

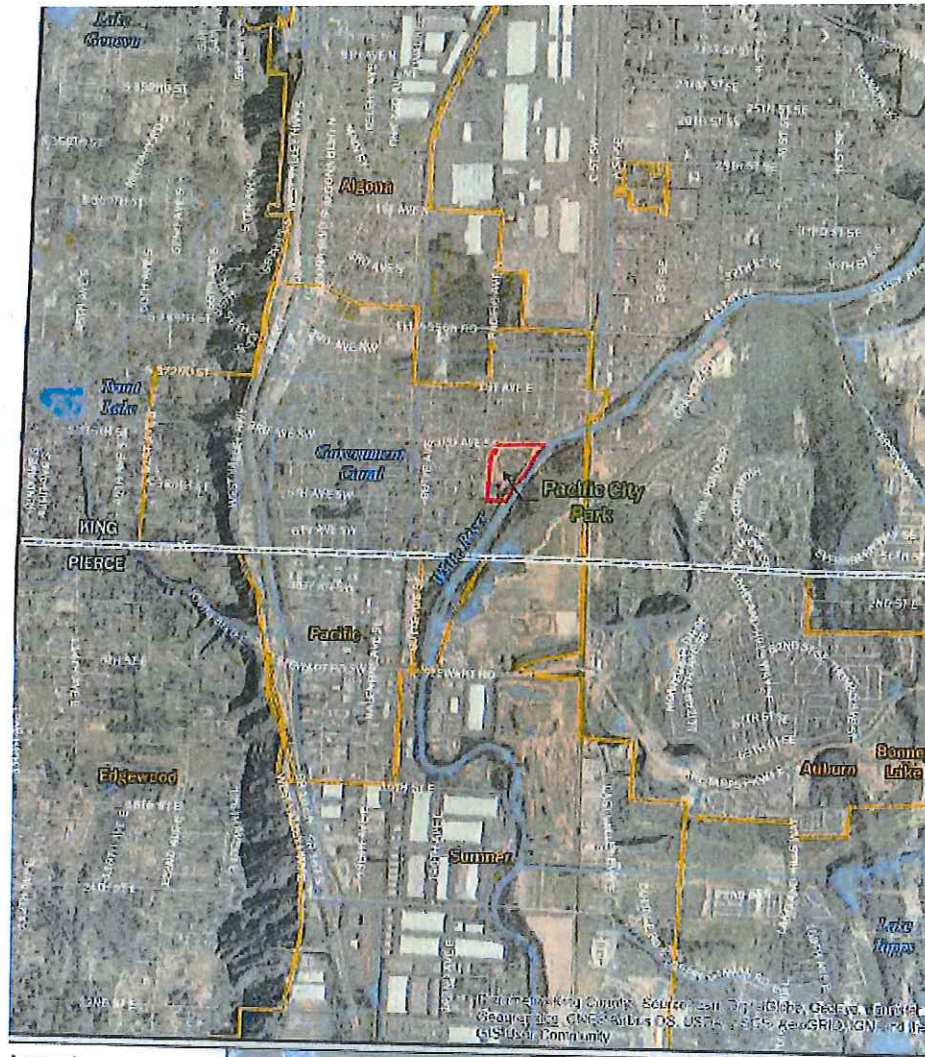
Water Supply: A public water supply is currently provided to the Property by the City of Pacific. According to Ecology's well log data base, there are no private drinking water wells located within approximately 1,000 feet of the Property.

Releases and Cleanup of Soil Contamination: Soil and ground water were contaminated due to releases from the former landfill and dumping ground. From 1985 to 2019, various investigations were conducted at the Site, which included characterization of the Property, determination of the COCs and monitoring of the ground water.

Based on reviewing historical photos, the municipal wastes, various debris and filled materials on the Site were removed in approximately 1968. The removal, clearing and surface-grading activities at the Property was continuously performed by King County during the 1990s. Currently, the County proposes to conduct a feasibility study to evaluate cleanup options for the Site.

SITE DIAGRAMS

Figure 1 Location of the Site



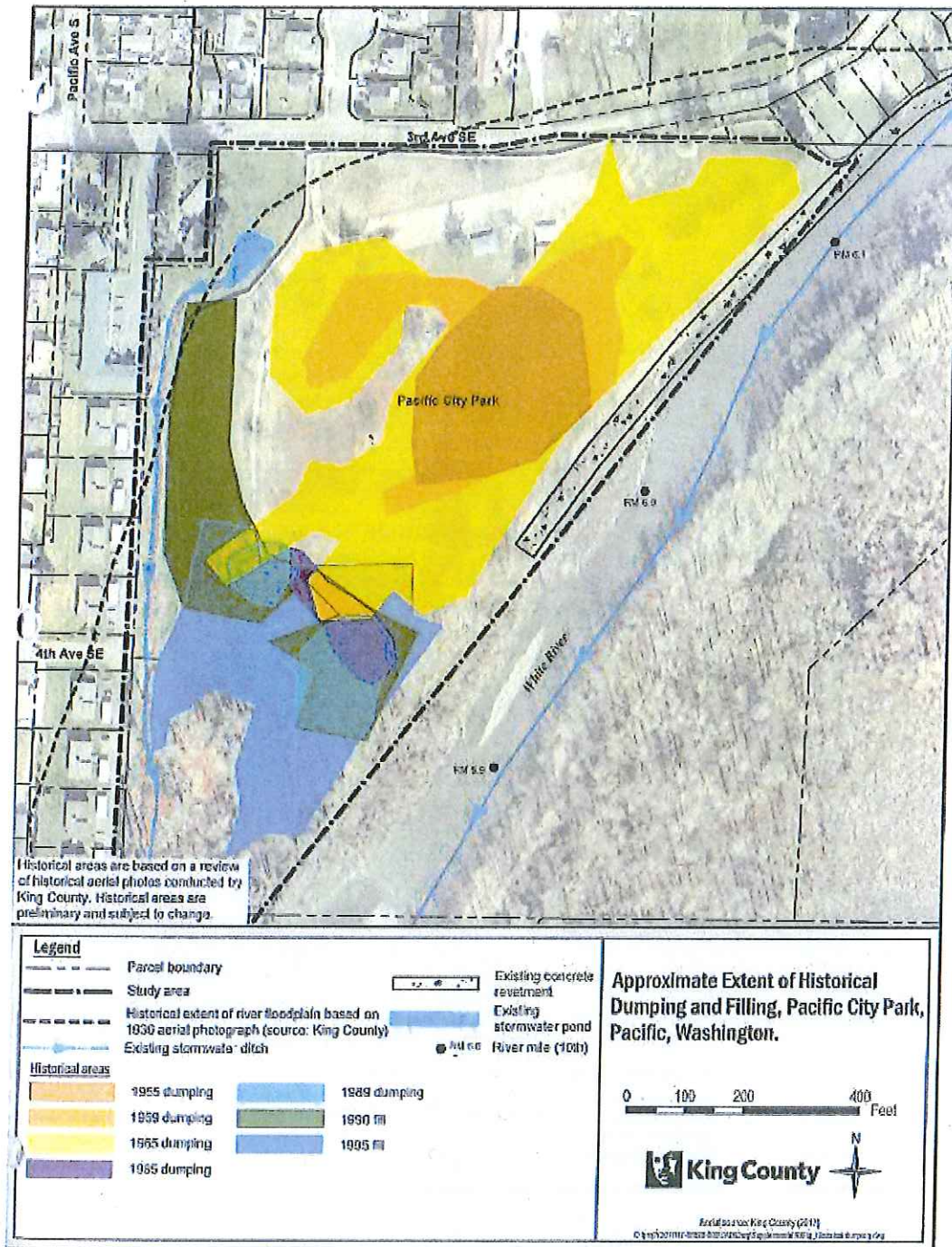
- Legend**
- Study area
 - County boundary
 - City limits
 - Waterbody
 - Stream (King County)
 - Roads



Figure 1. Vicinity Map, Pacific City Park, Pacific, Washington



Figure 2 Approximately Extent of the Historical Dumpsite Area



**Figure 3 Extent of Contamination of COCs in Soil and Ground Water
(Approximately Site Boundary)**

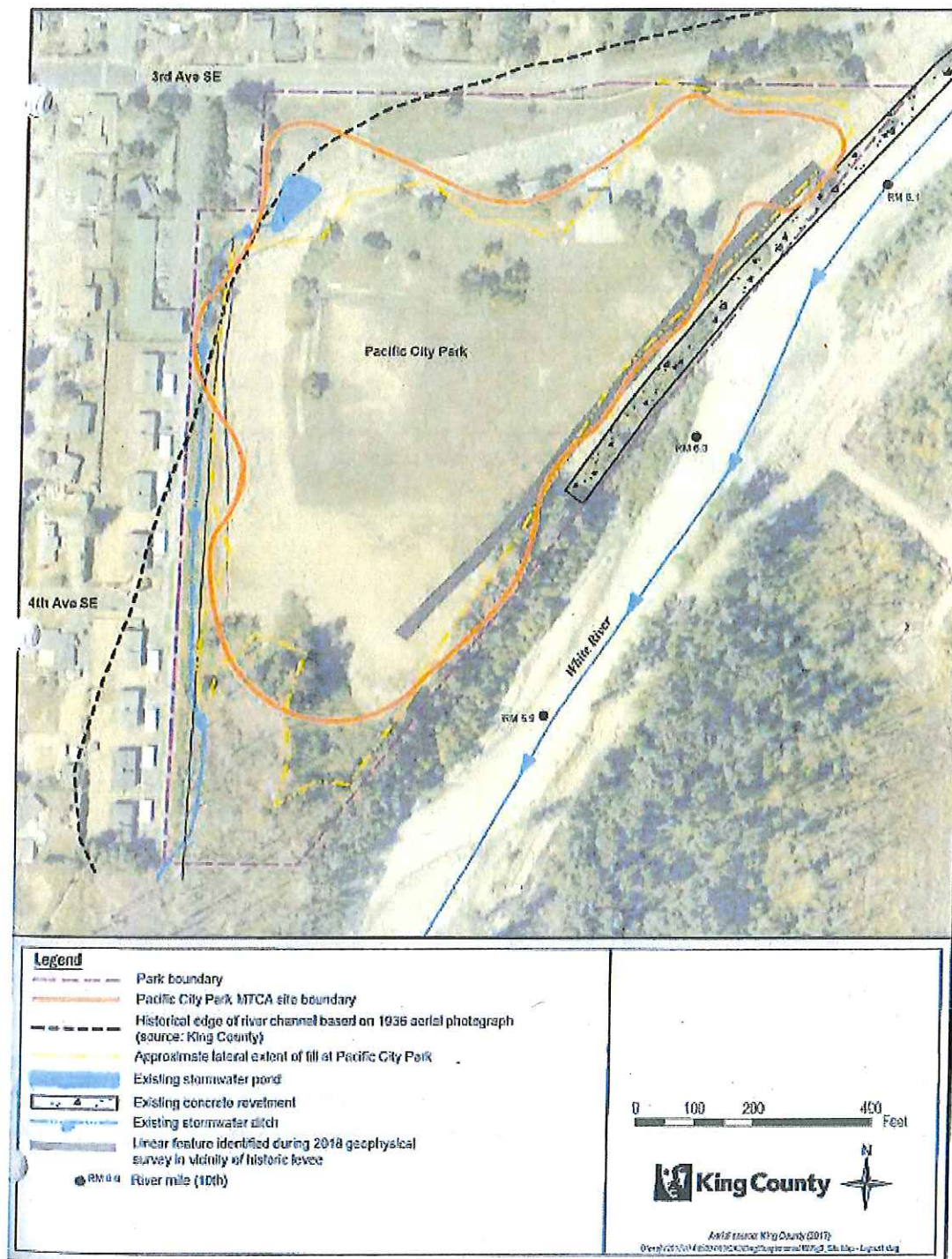


Figure 4 Ground Water Flow Direction

