



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

September 10, 2019

Greg Johnson  
Clark County Department of Public Works  
Camp Bonneville Military Reservation  
23201 NE Pluss Road  
Vancouver, WA 98682

**Re: No Further Action Determination for Remedial Action Unit 2A (RAU-2A) of the Camp Bonneville Army Reservation Facility**

- **Address:** 23201 NE Pluss Road, Vancouver, WA 98682
- **Facility/Site ID No.:** 47197/3867

Dear Greg Johnson:

Thank you for submitting the *Final Cleanup Action Report, Remedial Action Unit 2A (RAU-2A), Small Arms Ranges, Former Camp Bonneville Army Reservation, Vancouver, Washington*. The June 2018, report was prepared by Weston Solutions, Inc. (WESTIN) and describes cleanup actions completed at RAU 2A (Site), based on the 2007 Interim Action Work Plan for RAU 2A, 2008 Cleanup Action Report for RAU 2A, and the 2017 Addendum to the 2008 Cleanup Action Report. The report also satisfies applicable requirements of the Amended Pre-purchase Consent Decree relating to documentation of cleanup actions for RAU 2A, the Small Arms Ranges.

Remedial Action Unit 2A consisting of 21 small arms ranges, has been investigated and remediated of lead contamination.

Ecology's Toxics Cleanup Program has reviewed this final cleanup action report and the following supporting documents regarding the Site:

Atlanta Environmental Management, Inc. 2005. *Small Arms Ranges and Demolition Areas 2 and 3, Camp Bonneville, Vancouver, Washington*.

Bonneville Conservation Restoration and Renewal Team, LLC (BCRRT). 2007. *Final Remedial Investigation/Feasibility Study Report, Small Arms Ranges (RAU 2A), Camp Bonneville Military Reservation*. August.

BCRRT. 2008. *Final Cleanup Action Plan, Small Arms Ranges (RAU 2A), Camp Bonneville Military Reservation*. January.

- Calibre. 2005. *Draft Final Work Plan for the Interim Actions at the Small Arms Range Berms and Fire Support Areas*. March.
- Camp Bonneville Local Redevelopment Authority. 2003. *Camp Bonneville Reuse Plan*. Updated February 20, 2005.
- Michael Baker, Jr., Inc. 2010. *Draft Interim Action Work Plan, Excavation and Replacement of Lead-Impacted Fill Soils Under and Adjacent to RAU 2A-16, Camp Bonneville, Vancouver, Washington*. March 4.
- MKM. 2009. "Memorandum from Kathleen Anthony of MKM Engineers, Inc. to Dr. Ben Amoah-Forson of Washington State Department of Ecology with Subject: HTW Activities Complete for 2008 – Memo for the Record #3." January 9.
- MKM. 2010. "Memorandum from Kathleen Anthony of PIKA International, Inc. to Mark Knight of Michael Baker Jr., Inc. with Subject: Draft RAU-2A-21 Boundary Delineation After Action Report." February 25.
- Washington State Department of Ecology (WDOE). 2012. Amended Prospective Purchaser Consent Decree. NO. 06-2-05340-4, Clark County Superior Court. May 2.
- Weston Solutions, Inc. (WESTON). 2015. *Revised Final Work Plan Munitions and Explosives of Concern Removal Actions, Remedial Action Unit 3, Central Valley Floor and Associated Wetlands, Former Camp Bonneville Military Reservation, Vancouver, Washington*. September.
- WESTON. 2017. *Final Sampling and Analysis Plan, 1,000-Inch Rifle Range and Machine Gun Range, Remedial Action Unit 2 (RAU 2), Former Camp Bonneville Military Reservation, Vancouver, Washington*. February.
- WESTON. 2017b. *Addendum to the Cleanup Action Plan, Small Arms Ranges, RAU 2A-16 and RAU 2A-21, Former Camp Bonneville Military Reservation, Vancouver, Washington*. June.
- WESTON. 2017c. *Work Plan, Remedial Action Unit 2A, Small Arms Ranges 2A-16 and RAU 2A-21, Former Camp Bonneville Military Reservation, Vancouver, Washington*. August.

Based on our review of the final cleanup action report and supporting documentation listed above, **Ecology has determined that the remedial actions conducted at the Site are sufficient to meet the substantive requirements contained in the Model Toxics Control Act (MTCA), and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing lead contamination at the Site.** Therefore, Ecology is issuing this determination that **no further remedial action is necessary** at the Remedial Action Unit 2A site, also known as the Small Arms Ranges, under MTCA.

Greg Johnson  
September 10, 2019  
Page 3

Please note that because soils with lead concentrations above MTCA cleanup levels exist under a Cleanup Action Plan at Ranges 2A-16 and 2A-21, this determination is based on the continued effectiveness of the restrictive covenant that limits intrusive activities at the site.

This is required as part of the cleanup action for Ranges 2A-16 and 2A-21 under WAC 173-340-440 (9). A copy of the Restrictive Covenant filed with the deed of the property (Exhibit C) as part of the Environmental Protection Provisions for the Site must be attached to this letter. Any changes to any portion of the Restrictive Covenant must be approved by Ecology. If any portion of this Restrictive Covenant is violated, then this determination will automatically be rendered null and void and further remedial action may be required at Ranges 2A-16 and 2A-21. Based on this no further action determination, Ecology will update the status of the Site on its Hazardous site List (HSL) database.

This no further action determination does not apply to any other release or potential release of any contaminant including munitions of concern (MEC) that may impact any other portion of any property impacted by this Site, or any other property owned or operated by the Clark County.

Please note that this determination 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 determination 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 determination, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in making this determination.

If you have any questions regarding this opinion, please contact me at (360) 407-7227, or [ben.forson@ecy.wa.gov](mailto:ben.forson@ecy.wa.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Amoah-Forson". The signature is written in a cursive, somewhat stylized script.

Ben Amoah-Forson  
Toxics Cleanup Program

