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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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July 20, 2020

Shawn Lombardini
Associated Environmental Group (AEG)
605 11th Ave SE, Suite 201
Olympia, Washington 98501
slombardini@aegwa.com

Re: Rescission of No Further Action (NFA) Status for the following Site:

- **Site Name:** Richard J Niichel
- **Site Address:** 107 East Front Street, Port Angeles, WA 98362
- **Facility/Site ID:** 72232986
- **Cleanup Site ID:** 6562

Dear Shawn Lombardini:

The Department of Ecology (Ecology) issued a No Further Action (NFA) determination for the Richard J Niichel facility (Site) on July 18, 2007. A subsequent June 1, 2020, *Remedial Investigation/Feasibility Study*, completed by AEG,[1] provided additional information that contamination remains at this Site. Contamination was identified at concentrations greater than applicable Model Toxics Control Act Method cleanup screening levels for the following constituents:

- Total petroleum hydrocarbons and related constituents in soil, groundwater, and air (Enclosures B, C, and D).

Based on this information, Ecology rescinds the July 18, 2007, NFA determination. The effective date of the rescission is the date of this letter.

[1] https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=4201

Next Steps

Ecology will update its records to reflect that Ecology has rescinded the NFA determination for this Site. The Site will be listed in future publications of the Confirmed and Suspected Contaminated Sites List.[2]

If you have any questions about the rescission or next steps, please contact me at (360) 407-6257 or marian.abbett@ecy.wa.gov.

Sincerely,

Marian Abbett, P.E.
Acting Section Manager
Toxics Cleanup Program
Southwest Regional Office

MA:sl

Enclosures (2): A – Figure 5: Soil Plume Map
B – Table 2: Summary of Soil Excavation Analytical Results
C – Table 4: Summary of Groundwater Monitoring Analytical Results
D – Table 5: Summary of Sub-Slab Vapor and Indoor Air Analytical Results

cc by email: Michael Peters, Lower Elwha Klallam Tribe, Michael.peters@elwha.org
Scott Rose, AEG, srose@aegwa.com
Kristin Evered, PLIA, kristin.evered@plia.wa.gov
Nicholas Acklam, Ecology, Nicholas.acklam@ecy.wa.gov
Ecology Site File

[2] Available at: https://apps.ecology.wa.gov/tcpwebreporting/reports/cleanup/contaminated

Enclosure A

Figure 5 – Soil Plume Map

(From AEG, *Remedial Investigation / Feasibility Study*, June 1, 2020)

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PROJECT NUMBER	APPROVED BY	CHECKED BY	DRAWN BY	FILENAME
17-125	SL 6/01/2020	SL 6/01/2020	ICD 6/01/2020	17-125_2001.DWG

BLACKBALL FERRY SHOP

ALLEY

CHASE BANK

N LAUREL STREET

E FRONT STREET

E RAILROAD AVENUE

SIDEWALK

FORMER NECESSITIES AND TEMPTATIONS

110 EAST RAILROAD

FORMER ART GALLERY

PARKING

FORMER DOWNTOWN HOTEL

FORMER LARRY WINTERS GARAGE

101 EAST FRONT

107 EAST FRONT

111 EAST FRONT

FORMER BANK

BUILDING

CLALLAM COUNTY TRANSIT CENTER PARKING

FORMER RYDER OFFICE

50-0800

50-0700

RRB-6/MW-14, RRB-1, RRB-7, RRB-8/MW-15, RRB-2, RRB-3/MW-13, RRB-9, RRB-4, RRB-5

DB-6 SUSTBC@10'

DB-7

MW-25

SUSTESW@5'

DB-5

500 GALLON 10[illegible]

DB-8

B-12, B-13, B-11, B-10, B-9, B-8, B-7, B-6, B-5, B-4, B-3, B-2, B-1, B-16, B-14, B-15

MW-4, MW-8, MW-7, MW-19, MW-20, MW-21, MW-16, MW-17, MW-18, MW-6, MW-5, MW-9/B-3, MW-12, MW-11, MW-3, MW-10, MW-24, MW-2, MW-23, MW-1, MW-22

500 GALLON HEATING OIL AST

DB-3, DB-2, DB-4, DB-1

1000 GALLON DIESEL UST

CORNERHOUSE UST @8'

300 GALLON DIESEL UST

RONUSTBC@6'

500 GALLON GAS UST

1,000 GALLON GAS UST

3,000 GALLON GAS UST

500 GALLON GAS UST

2,500 GALLON HEATING OIL UST

500 GALLON DIESEL UST

SCP@6', SWC@6', SWBC@13', NWS@6', SWS@6', SSWB@12', WB@12', (P)SW@6',SWB@12', NW@6', NC@6'&12', NE@6', NEB@12', E@6', SV2@6'(P), SV1@6'(P), SSES@6', SES@6'(P), W@6, W60'@8', WNW@8' (PERF), NW30'UST@6', SWUST@6', USTB@6'&12', SEUST@6, NEUST@6, ROE10'UST@12'BC, ROSBCUST@8', E20'UST, ROS10'@8', ROS15'@8', RO10'EUST@8', ROE20'UST@8', NW65'@6', NW75'@6', NW55'@8', NW75'@8', NW55'@8', WNW@8', WNW@45'@8', N30'UST@6', NEBC30'SUSTRO@15', NNW45'UST@8'&12', NW35'UST@8', N15'UST@6', N15'SROUST@10', ROSUSTBC@6'&, NEBC20'SUSTRO@15', RONUST30'@8',@12', RONUST@8'(P), RONEUST30'@8', RONEUST20'@8', MW-1@12', MW-1E10'@12', NW65'@8', NNW@45'@8', NW@8', NW@6', NW@12', NW@8', NW@12', NW@6', NW@8', NW@12', NW@6', NW@8', NW@12', NW@6

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Enclosure B

Table 2 – Summary of Soil Excavation Analytical Results

(From AEG, *Remedial Investigation / Feasibility Study*, June 1, 2020)

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Table 2 - Summary of Soil Excavation Analytical Results
Lower Elwha Klallam Tribe Hotel
Port Angeles, Washington

Sample Number	Sample Type[1]	Depth Collected (feet)	Date Collected	Total Petroleum Hydrocarbons			Volatile Organic Compounds			
				Gasoline	Diesel	Heavy Oil	Benzene	Toluene	Ethyl-benzene	Xylenes
Excavation Area A - South Side of Site										
E @ 6'	C	6.0	11/1/2019	**11**	--	--	<0.02	<0.10	<0.05	<0.15
SV1 @ 6'	P	6.0	11/1/2019	**5,970**	--	--	<0.02	<0.10	<0.05	<0.15
NE @ 6'	C	6.0	11/1/2019	**15**	--	--	<0.02	<0.10	<0.05	<0.15
SV2 @ 6'	P	6.0	11/1/2019	**173**	--	--	<0.02	<0.10	<0.05	<0.15
NEB @ 12'	C	12.0	11/1/2019	**14**	--	--	<0.02	<0.10	<0.05	<0.15
SES @ 6'	P	6.0	11/4/2019	**84**	--	--	<0.02	<0.10	<0.05	<0.15
SSES @ 6'	C	6.0	11/4/2019	**11**	--	--	<0.02	<0.10	<0.05	<0.15
SWB @ 12'	C	12.0	11/4/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
NC @ 6'	C	6.0	11/4/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
NC @ 12'	C	12.0	11/4/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
W @ 6'	C	6.0	11/4/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
WB @ 12'	C	12.0	11/4/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
SWS @ 6'	C	6.0	11/5/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
SWBC @ 13'	C	13.0	11/5/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
SCP @ 6'	C	6.0	11/5/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
NWS @ 6'	C	6.0	11/5/2019	<10	--	--	**0.025**	<0.10	<0.05	<0.15
NWC @ 6'	C	6.0	11/5/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
NWC @ 12'	C	12.0	11/5/2019	<10	--	--	<0.02	<0.10	<0.05	<0.15
Excavation Area B - Central Portion of Site										
NEUST @ 6' OIL	P	6.0	11/6/2019	--	**4,480**	<250	--	--	--	--
SEUST @ 6' OIL	C	6.0	11/6/2016	--	**70**	<250	--	--	--	--
USTB @ 6'	C	6.0	11/6/2019	--	<50	<250	--	--	--	--
USTB @ 12'	C	12.0	11/6/2019	--	<50	<250	--	--	--	--
N15'UST @ 6'	C	6.0	11/7/2019	--	<50	<250	--	--	--	--
SWUST @ 6'	C	6.0	11/7/2019	--	<50	<250	--	--	--	--
N30'UST @ 6'	C	6.0	11/8/2019	--	<50	<250	--	--	--	--
NW30'UST @ 6'	C	6.0	11/8/2019	--	<50	<250	--	--	--	--
NW35UST @ 8'	C	8.0	11/8/2019	--	<50	<250	--	--	--	--
NNW45' @ 8'	C	8.0	11/11/2019	--	<50	<250	--	--	--	--
NW55' @ 8'	C	8.0	11/11/2019	--	<50	<250	--	--	--	--
NNW45 @ 12'	C	12.0	11/11/2019	--	<50	<250	--	--	--	--
W60' @ 8'	C	8.0	11/12/2019	--	<50	<250	--	--	--	--
WNW @ 6' (PERF)	P	6.0	11/12/2019	--	**56**	<250	--	--	--	--
WNW @ 8'	C	8.0	11/12/2019	--	<50	<250	--	--	--	--
NW65' @ 6'	C	6.0	11/12/2019	--	<50	<250	--	--	--	--
NW65' @8'	C	8.0	11/12/2019	--	<50	<250	--	--	--	--
NW75' @ 6'	C	6.0	11/12/2019	--	<50	<250	--	--	--	--
NW75' @ 8'	C	8.0	11/12/2019	--	<50	<250	--	--	--	--
RO S UST BC @ 6'	P	6.0	11/13/2019	--	**8,100**	<250	--	--	--	--
RO S BC UST @ 8'	P	8.0	11/13/2019	--	**10,400**	<250	--	--	--	--
N 15' S RO UST @ 10'	C	10.0	11/13/2019	--	<50	<250	--	--	--	--
RO S 10' @ 8'	P	8.0	11/13/2019	--	**5,720**	<250	--	--	--	--
RO S 15' @ 8'	C	8.0	11/14/2019	--	<50	<250	--	--	--	--
ROE 10' UST @ 8'	P	8.0	11/14/2019	--	**5,040**	<250	--	--	--	--
RO N 15' UST @ 8'	P	8.0	11/14/2019	--	**5,368**	<250	--	--	--	--
RO E 10' UST@ 12' BC	P	12.0	11/14/2019	--	**4,010**	**1,200**	--	--	--	--
RO N UST BC @ 6'	C	6.0	11/14/2019	--	<50	<250	--	--	--	--
RO E 20' UST @8'	C	8.0	11/14/2019	--	<50	<250	--	--	--	--
RO NE UST 20' @ 8'	C	8.0	11/14/2019	--	<50	<250	--	--	--	--
MW1 @ 12' E 20' UST	P	12.0	11/14/2019	--	**7,190**	<250	--	--	--	--
RO NE UST 30' @ 8'	C	8.0	11/14/2019	--	**222**	<250	--	--	--	--
MW1 E 10' @ 12'	C	12.0	11/14/2019	--	<50	<250	--	--	--	--
RO N 30' UST @ 8'	C	8.0	11/14/2019	--	<50	<250	--	--	--	--
RO N 30' UST @ 12'	C	12.0	11/14/2019	--	<50	<250	--	--	--	--
NE BC 30'S UST RO @ 15'	C	15.0	11/15/2019	--	<50	<250	--	--	--	--
NE BC 20' S UST RO @15'	C	15.0	11/15/2019	--	<50	<250	--	--	--	--
CORNERHOUSE UST @ 8'	C	15.0	11/15/2019	--	<50	<250	--	--	--	--
Excavation Area C - North Side of Site										
S UST E SW @5'	P	5.0	11/13/2019	--	<50	**3,090**	--	--	--	--
S UST BC @ 10'	C	10.0	11/13/2019	--	<50	<250	--	--	--	--
10' ES UST ESW @ 5'	C	5.0	11/13/2019	--	<50	<250	--	--	--	--
Ketstone Wall Excavation Area - Within E Front Street ROW										
L1 @ 6'	C	6.0	2/6/2020	**13**	--	--	<0.02	<0.010	<0.05	<0.15
L2 @ 6'	P	6.0	2/6/2020	**3,720 E**	--	--	<0.02	<0.010	<0.05	<0.15
L3 @ 6'	C	6.0	2/6/2020	**1,250**	<50	<100	<0.02	<0.010	<0.05	<0.15
L4 @ 6'	C	6.0	2/6/2020	**2,000**	--	--	<0.02	<0.010	<0.05	<0.15
L5 @ 9'	C	9.0	2/6/2020	**44**	--	--	<0.02	<0.010	<0.05	<0.15
L6 @ 6'	C	6.0	2/6/2020	**37**	<50	<100	<0.02	<0.010	**0.28**	**1.9**
L7 @ 6'	C	6.0	2/6/2020	<10	<50	<100	<0.02	<0.010	<0.05	<0.15
L8 @ 6'	C	6.0	2/6/2020	**400**	--	--	<0.02	<0.010	**1.1**	**8.1**
PQL				10	50	100	0.02	0.010	0.05	0.15
MTCA Method A Cleanup Levels				30*	2,000	2,000	0.03	7	6	9

Notes:
All values reported in milligrams per kilogram (mg/kg)
-- = Not analyzed for constituent
PQL = Practical Quantification Limit (laboratory detection limit)
< = Not detected at the listed laboratory detection limits
Red Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level
Bold indicates the detected concentration is below Ecology MTCA Method A cleanup levels
[1] P = Performance Sample (over excavated & resampled); C = Confirmation Sample (indicative of what remains in place)
* Cleanup level with the presence of Benzene anywhere on the site

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Enclosure C

Table 4 – Summary of Groundwater Monitoring Analytical Results

(From AEG, *Remedial Investigation / Feasibility Study*, June 1, 2020)

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Table 4 - Summary of Groundwater Monitoring Analytical Results
Lower Elwha Klallam Tribe Hotel
Port Angeles, Washington

Sample Number	Date Collected	Total Petroleum Hydrocarbons			Volatile Organic Compounds				Total Lead	Dissolved Lead	Total Naphthalenes	Total cPAHs
		Gasoline	Diesel	Heavy Oil	Benzene	Toluene	Ethyl-benzene	Xylenes				
MW-1*	7/11/2017	<100	**782**	<500	<1.0	<1.0	<1.0	<3.0	**48**	--	--	--
	10/12/2017	**101**	<250	<500	<1.0	<1.0	<1.0	<3.0	**12**	<5.0	--	--
MW-2*	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	**12**	--	<0.1	<0.1
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
MW-3*	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	**23**	<5.0	--	--
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
MW-4*	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
MW-5	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	--	--	--
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-6	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-7	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	--	--	--
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-8	7/11/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	--	--	--
	10/12/2017	<100	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-9	7/11/2017	**860**	<250	<500	<1.0	<1.0	<1.0	<3.0	**8.9**	<5.0	--	--
	10/12/2017	**922**	<250	<500	<1.0	<1.0	<1.0	<3.0	<2.0	<5.0	--	--
	5/20/2020	**108**	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-13	5/20/2020	**810**	<200	<400	**7.7**	**4.4**	**23**	**25**	--	--	--	--
MW-14	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-15	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-16	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-17	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-18	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-19	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-20	5/20/2020	**139**	<200	<400	**2.9**	<1.0	**2.6**	**9.5**	--	--	--	--
MW-21	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	**2.5**	--	--	--	--
MW-22	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-23	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-24	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
MW-25	5/20/2020	<100	<200	<400	<1.0	<1.0	<1.0	<3.0	--	--	--	--
PQL		100	200-250	400-500	1.0	1.0	1.0	3.0	2.0	5.0	0.1	0.1
MTCA Method A Cleanup Levels		800	500	500	5	1,000	700	1,000	15		160	0.1

Notes:
All values reported in micrograms per liter (µg/L)
-- = Not analyzed for constituent
< = Not detected at the listed laboratory detection limits
PQL = Practical Quantification Limit (laboratory detection limit)
Red Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level
Bold indicates the detected concentration is below Ecology MTCA Method A cleanup levels
* Wells decommissioned during excavation.

cPAHs = Carcinogenic polycyclic aromatic hydrocarbons

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Enclosure D

Table 5 – Summary of Sub-Slab Vapor and Indoor Air Analytical Results

(From AEG, *Remedial Investigation / Feasibility Study*, June 1, 2020)

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Table 5 - Summary of Sub-Slab Vapor and Indoor Air Analytical Results
Lower Elwha Klallam Tribe Hotel
Port Angeles, Washington

Lab Sample Number		Sub Slab[1]	Method B Sub-Slab Screening Level	Basement S[1]	Outdoor N[1]	Method B Indoor Air Cleanup Level
Date Collected		6/7/2017		6/7/2017	6/7/2017	
Sample Type		Sub-Slab		Indoor Air	Outdoor Air	
APH - Air Phase Hydrocarbons	EC5-8 Aliphatics	**6,600 ve x**	90,000	**1,700**	**220**	2,700
	EC 9-12 Aliphatics	**5,700 ve x**	4,700	**310**	**180**	140
	EC 9-10 Aromatics	**310**	6,000	**170**	<100	180
Detected Volatile Organic Compounds	Benzene	**5.9**	10.7*	**27**	**0.41**	0.321*
	Toluene	**100**	76,200	**170 ve**	**2.6**	2,290
	Ethylbenzene	**20**	15,200	**66**	**0.43**	457
	m,p-Xylene	**97**	1,520	**290 ve**	**2.4**	45.7
	o-Xylene	**38**	1,520	**92 ve**	**0.93**	45.7
	Hexane	**14**	10,700	**51**	<7	320
	Naphthalene	**6.1**	2.45*	**4.8 fb**	**0.38 fb**	0.0735*

Notes:
All values presented in micrograms per cubic meter ($\mu g/m^3$)
< = Not detected above laboratory limits
* Cancer cleanup/screening level (all other constituents listed do not have cancer values)
Red Bold indicates the detected concentration exceeds Ecology MTCA Method B cleanup or screening levels
Bold indicates the detected concentration is below Ecology MTCA Method B cleanup or screening levels
ve = The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.
x = The sample chromatographic pattern does not resemble the fuel standard used for quantification.
fb = The analyte was detected in the method blank.
[1] The building where these samples were collected has since been demolished.

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