



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 29, 2016

Norm Payton
Washington State Department of Transportation
PO Box 47358
Olympia, WA 98504-7358

Re: Notice of Intent to Perform Site Characterization Activities at the Toledo Maintenance Facility, Milepost 1.43, State Route 505, Toledo, Washington (CSID 8567; FSID 27866869)

Mr. Payton:

On September 24, 1992, the Department of Ecology (Ecology) was notified of a suspected release of petroleum product from an underground storage tank (UST) system located at Milepost 1.43, State Route 505, Toledo, Washington (Site). As a result, the Site was added to Ecology's Confirmed or Suspected Contaminated Sites List (CSCL) as an active Leaking Underground Storage Tank (LUST) Site and is awaiting further characterization and potential cleanup before a determination of No Further Action (NFA) can be granted. The Site is currently listed in Ecology's database as WA DOT Toledo with Facility Site number 27866869.

Notice of Intent to Perform Site Characterization Activities

Ecology has recently received funding to provide additional site characterization to assist a limited number of LUST sites towards closure. The intent of these proposed activities is to further characterize previously identified petroleum impacts at LUST sites still awaiting receipt of a NFA determination from Ecology. As a result, your Site was selected to receive a portion of these funds.

Ecology is working with local consultants to perform the characterization activities (described below) in the next few months and would like to discuss these events with you. It should be noted that Ecology will procure, coordinate, and manage the contractors performing this work as well as any associated funding.

Though the Model Toxics Control Act (MTCA) requires potentially liable persons to assume responsibility for the cleanup of contaminated sites, the site characterization work proposed herein will be funded by Ecology and you will not incur costs associated with these activities. Ecology, however, may require additional characterization or cleanup, at your cost, if you chose to forego

these activities or if residual contamination is discovered in excess of the appropriate MTCA cleanup levels.

If no contamination is found at your Site, or if residual contamination is discovered below the appropriate MTCA cleanup levels, a NFA determination may be issued for the Site by Ecology; however, if residual contamination exceeding the applicable MTCA cleanup levels is identified during the characterization process, your property will remain on Ecology's CSCL, which can be found at <http://www.ecy.wa.gov/programs/tcp/sites/SiteLists.htm>. Sites remaining on Ecology's CSCL are encouraged to enroll in the department's Voluntary Cleanup Program, which is designed to provide fee-based technical assistance in an effort to facilitate and accelerate the site cleanup and closure processes. If you would like additional information regarding this program, please visit the VCP program website at <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm> or contact Nicholas Acklam at (360) 407-6347 or nack461@ecy.wa.gov.

Proposed Characterization Activities

To further characterize the current nature and extent of previously identified petroleum hydrocarbon impacts at the subject Site, three to five small-diameter, direct-push borings will be advanced to approximately 40 feet below ground surface in the vicinity of the former underground storage tank(s) [(USTs); see attached Work Plan for additional information]. Samples of soil and groundwater (if present) will be collected at each location and analyzed for petroleum hydrocarbon constituents. To minimize operational impacts at the subject Site during characterization activities, a truck mounted, direct-push drill rig will be used to advance the borings.

Prior to commencing the above activities, the contractor performing the work will coordinate these activities with you and conduct a utility survey to assure each proposed boring location is free of subsurface utilities. Following advancement and sampling, boring locations will be grouted and sealed in an effort to match both surface grade and material as close to original conditions as possible. Waste will be securely stored on-site, pending characterization and disposal.

A work plan describing specific details of the proposed further characterization activities is included in this transmittal for your records.

Notification of Results

Once characterization activities have been completed, a report summarizing the results of those activities will be provided to you along with Ecology's assessment and further recommendations, if applicable.

Access Agreement and Scheduling

A Property Access Agreement is included with this transmittal. Please complete, sign, and return the original copy of this form to the address indicated at the bottom of that document. Once the executed form is received by Ecology, you will be contacted regarding scheduling both the pre-

Mr. Norm Payton
September 29, 2016
Page 3

field, utility clearance visit and site characterization work, as described in the attached Work Plan.

Contact Information

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of contaminated sites, please contact me at (360) 407-0276 or jhug461@ecy.wa.gov. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Hughes', with a long horizontal line extending to the right.

Jeremy Hughes, LG
LUST Backlog Coordinator
Toxics Cleanup Program, Southwest Regional Office

Enclosures (2)

1. Access Agreement
2. Work Plan

cc: Nicholas M. Acklam, Ecology
Ivy Anderson, Office of the Attorney General
Ecology Site File

1.0 Objective and Approach

The objective of the activities discussed herein is to further characterize the current nature and extent of previously identified petroleum hydrocarbon impacts at the following subject sites (Figures 1 through 5):

- Wahkiakum County Road Shop #3 (Ecology FSID 68575262; Figure 1a) - 4288 State Highway 4, located in Rosburg, WA
- City of Aberdeen Water Treatment Facility (Ecology FSID 3639864; Figure 2a) - West Heron Street and South Garfield Street, Aberdeen, WA
- Elma School District Transportation Facility (Ecology FSID 84796885; Figure 3a) - 1121 Monte Elma Road, Elma, WA
- Larison and Sons (Ecology FSID 67568952; Figure 4a) - 6332 Pacific Ave, Tacoma, WA; and,
- Washington State Department of Transportation, Toledo Maintenance Facility (Ecology FSID 27866869 ; Figure 5a) - State Route 505, Milepost 1.43, Toledo, WA

To achieve this objective, up to five direct push (DP) borings will be advanced to groundwater in the vicinity of the former underground storage tank(s) (UST). The number of borings to be advanced at each of the sites is as follows:

- Wahkiakum County Road Shop #3 - 3 borings (Figure 1b)
- City of Aberdeen Treatment Facility – 5 borings (3 borings within “Area A” and 2 borings within “Area B”; Figure 2b)
- Elma School District Transportation Facility - 3 borings (Figure 3b)
- Larison and Sons - 5 borings (Figure 4b); and,
- Washington State Department of Transportation, Toledo Maintenance Facility - 4 borings (Figure 5b)

At each location, lithologic information will be collected to assess for petroleum-affected soil, preferential pathways, and other observable hydrogeological characteristics (e.g. saturation, granularity, and organic content). In addition to this information, soil and groundwater (if encountered) samples will be collected from each location and analyzed as described in Section 2.2. Soil sample selection will be based on in-field observations and screening with a photo-ionization detector (PID). Groundwater samples will be collected where encountered beneath the subject sites, up to the target boring depth. Collected soil and groundwater samples will be submitted on “hold” to a Washington State-certified analytical laboratory for subsequent review and sample selection by Ecology staff.

Additional details regarding boring advancement and sample collection are provided in Section 2.2, below.

2.0 Scope of Work

The following sections present the scope of work that will be needed to complete the objectives described above.

2.1 Pre-Field Activities

The following activities will be conducted prior to commencing site characterization activities.

2.1.1 Access Agreements

Ecology has contacted the property owners and notified them of the intent to conduct the activities described herein. However, to secure access to the property where the proposed site characterization work will be performed, the Contractor will contact the property current owners for prior approval of this right of entry. Additionally, coordination of field activities will be the responsibility of the Contractor and every effort should be made to minimize operational impacts at the subject sites during characterization activities.

2.1.2 Drilling Permits

Prior to commencing intrusive field work, the Contractor will submit a Notice of Intent to advance the proposed site characterization borings to Ecology.

2.1.3 Utility Clearance

In accordance with local notification requirements, the State underground utility notification system (washington811.com) will be contacted prior to commencing intrusive field activities. In addition to this notification, a private utility locator will also be obtained to assess for potential underground utilities at the subject sites. To further assure that boring locations are free of underground utilities, a hand auger or air knife will be used to expose each location to a depth of 5 feet bgs.

If it is discovered that underground infrastructure or obstructions conflict with a proposed boring location, field personnel must notify Ecology of this finding prior to continuing further intrusive activities at that location. As a result, Ecology may propose an alternative boring location based on available field information.

2.1.4 Health and Safety Plan

The Contractor will prepare a Site-Specific Health and Safety Plan (HSP) **for submittal to Ecology at least two weeks prior to conducting activities** at the subject sites. Activities conducted under Ecology direction shall be performed in compliance with regulations set forth by the federal Occupational Safety and Health Administration (OSHA) and Washington State Division of Occupational Safety and Health (DOSH). A copy of the HSP will be kept on-site for the duration of the associated field activities. Additionally, all field staff will have the appropriate, current Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) training.

2.2 Boring Advancement and Sample Collection

The proposed DP borings described in this Work Plan will be advanced by a Washington State-licensed driller, using either 1.25- or 2.125-inch diameter, acetate-lined probes (or equivalent). DP borings will be advanced beyond the previously-cleared depth of ~5-ft bgs and continuous core samples will be collected and logged using the Unified Soil Classification System (USCS). **Borings will be advanced to a total depth of up to 40-ft. bgs at each location or 15-ft beyond first encountered groundwater, if present, at depths less than 15-ft. bgs.**

During lithologic logging, PID measurements shall be collected at the following intervals:

- The initial, 5-ft soil interval and each 5-ft interval thereafter;
- Observed changes in lithology;
- Indications of soil staining; and
- Immediately above saturated soil conditions, if present.

Based on field review of lithologic conditions and PID field-screening, soil sample intervals will be collected for chemical constituent analysis as described below.

Soil samples selected for chemical constituent analysis will be cut (approximately 1-ft of sample core) and left intact in the acetate-liner, capped, and sealed with clean silicon or PTFE (Teflon™) caps, and placed into an ice-filled cooler for transport to an Ecology-accredited analytical laboratory. Soil from the upper 5 feet, **if exhibiting observable hydrocarbon impacts**, should be collected and placed in either 4- or 8-ounce, laboratory-supplied and certified-clean glass sample containers. Following collection, the sample shall be placed into an ice-filled cooler for transport to a Washington State-licensed analytical laboratory.

Additionally, groundwater, where encountered **at each location and water-bearing interval**, will be collected using a Hydropunch™ (or equivalent) sampling device. Once groundwater has been allowed to enter the device, a small-diameter, disposable bailer will be deployed for retrieval of the sample. Once retrieved, the groundwater sample will be decanted into the appropriate and properly preserved, laboratory-supplied and certified-clean sample container and placed into an ice-filled cooler for transport to a Washington State-licensed analytical laboratory.

Following collection, soil and groundwater samples must be kept cool (at least 4° C) and transferred under chain-of-custody (COC) protocol **to be held** by laboratory for the following analyses:

- NWTPH-Gx for gasoline range organics (GRO) and NWTPH-Dx for diesel range organics (DRO) and heavy oils;
- Volatile organic compounds (VOCs; full list) using EPA Method 8260b; and
- Total and dissolved lead using EPA Method 6010b or 6020.

Note that laboratory method detection limits for individual chemical constituents must be less than or equal to MTCA Method A Cleanup Levels for the appropriate sample media (Tables 720-1 and 740-1 of Chapter 173-340 WAC).

Ecology staff will review the associated COC and field notes and contact the Contractor regarding release of specific samples for analysis.

Within 30 days of receipt of analytical data, the Contractor shall upload the associated electronic data deliverable (EDD) to Ecology's Environmental Information Management (EIM) system database.

2.3 Investigation-Derived Waste

Investigation-derived waste (IDW) soil and groundwater, generated as part of the above-described work will be temporarily and securely stored on-site in appropriate and properly-labelled containers. Following characterization, IDW will be transported by a Washington State-licensed transporter to an appropriate landfill for subsequent disposal. Management and disposal of IDW will be the responsibility of the Contractor performing the characterization activities.

2.4 Reporting

Within 30 days of receiving the analytical laboratory reports, the Contractor shall prepare a brief summary-report describing the field activities and tabulating the sampling and analysis results for submittal to Ecology. This summary should include a figure depicting actual boring locations at the subject sites and include all field notes and lithologic logs generated during performance of the field activities.

Figures

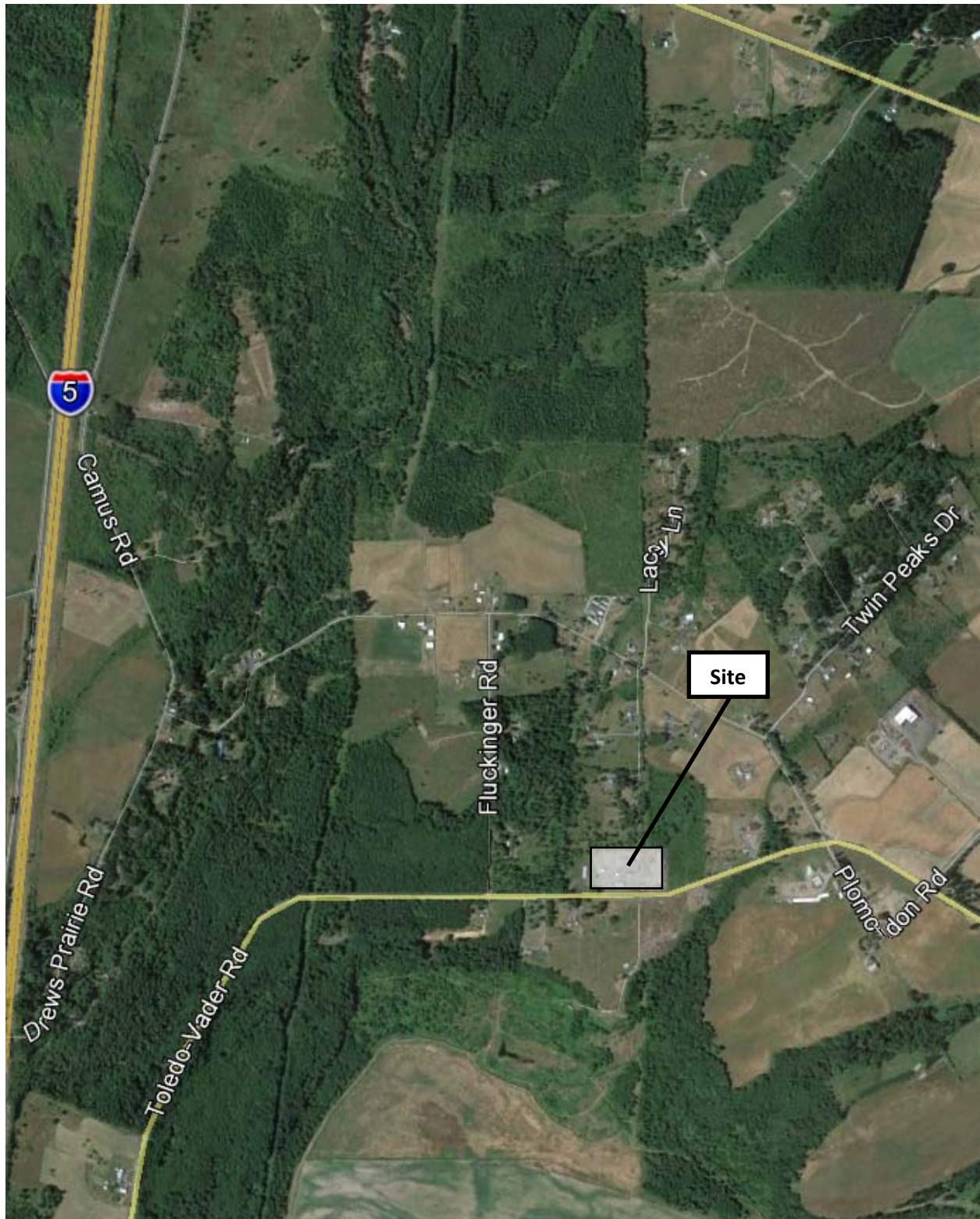


Figure 5a. Site Vicinity Map. Washington State Department of Transportation, Toledo Maintenance Facility, State Route 505, Milepost 1.43, Toledo, Washington.



Figure 5b. Proposed Soil Boring Locations. Washington State Department of Transportation, Toledo Maintenance Facility, State Route 505, Milepost 1.43, Toledo, Washington.

Property Access Agreement for Subsurface Characterization Activities

Designee Name: Norm Payton

Facility Name/Address: Washington State Department of Transportation
Toledo Maintenance Facility
Milepost 1.43, State Route 505
Toledo, Washington

Site Information (to be completed by recipient)

Locked Gates: Yes/No **Septic:** Yes/No **Underground Utilities:** Yes/No

Other safety hazards, concerns, or performance constraints (please describe):

Preferred location for stored, investigation-derived waste (please describe or include map):

Agreement Language

1. Ecology is responsible for the investigation and remediation of hazardous waste sites in Washington pursuant to the Model Toxics Control Act (MTCA), Chapter 70.105D RCW and Chapter 173-340 WAC.
2. Upon reasonable notice (unless an emergency prevents such notice), Ecology may exercise the authority to enter upon any property to conduct investigations of a release of a hazardous substance, and to conduct remedial actions (including investigations) to remedy releases of hazardous substances. RCW 70.105D.030(1)(a) & (b); WAC 173-340-800.
3. By signing this Access Agreement, the Property Designee certifies that he/she is fully authorized to enter into the terms and conditions of this Access Agreement and grants full access rights to Ecology and/or any authorized representative of Ecology for the purpose of investigating and remediating the release of hazardous substances at the Property. This includes, but is not limited to the scope of work described in the attached Work Plan. Ecology will attempt to provide reasonable advance notice of entry by calling the Property Designee, or notifying the Property Designee, in person, at least 48 hours in advance of entry on the Property.
4. The Property Designee agrees to indemnify, defend, and save and hold harmless the State of Washington, its employees, and agents from any and all claims or causes of action for death or injuries to persons or for loss or damage to property to the extent arising from or on account of acts or omissions of the Property Designee, its officers, employees, agents, or contractors in entering into this agreement or that may occur in the course of Ecology accessing the property pursuant to this agreement. However, the

Property Designee shall not indemnify the State of Washington, defend, nor save nor hold harmless its employees and agents from any claims or causes of action to the extent arising out of the negligent acts or omissions of the State of Washington, or the employees or agents of the State, in entering into this agreement or accessing the property pursuant to this agreement.

5. Ecology and the Property Designee may mutually amend this Access Agreement. Any amendments shall not be binding on either party unless such amendments are in writing and signed by an authorized representative of each party.
6. This Access Agreement between Ecology and the Property Designee contains all the terms and conditions agreed upon by and between the parties. No other understandings, verbal or otherwise, regarding the subject matter of this agreement shall be enforceable on any of the parties.

Property Designee

Date

Please return your executed, hard copy of this form to Jeremy Hughes, TCP-SWRO, Department of Ecology,
P.O. Box 47775, Olympia, WA 98504-7775, or **scan and email to** jhug461@ecy.wa.gov