



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

February 22, 2007

Ms. Susan Penoyar, P.E.  
CDM, Inc.  
11811 NE First St., Suite 201  
Bellevue, WA 98005

**Re: No Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site:**

- Name: Paine Field Sheriff Pistol Range
- Address: 3220 100<sup>th</sup> Ave. S.W., Everett, WA 98204
- Facility/Site No.: 15848557
- VCP No.: NW1626

Dear Ms. Penoyar:

Thank you for submitting your independent remedial action report for the Paine Field Sheriff Pistol Range 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. Phase I and Limited phase II Environmental Assessment, North Kilo/Sheriff's Pistol Range Area, Snohomish County Airport, Snohomish County, Washington, October 21, 1996, AGI Technologies, Prepared for Snohomish County Public Works Department, 2930 Wetmore Ave., Everett, WA 98201
2. Additional Sampling Results, Sheriff's Pistol Range, Snohomish County Airport, Snohomish County, Washington, April 24, 1997, AGI Technologies
3. Hydrologic Setting, Paine Field Area, Everett, Washington, December 29, 2000, CDM Inc., CDM Project No. 19947-29702-15512334
4. Remedial Investigation/Feasibility Study, Sheriff's Pistol Range, Snohomish County Airport, Snohomish County, Washington, February 11, 2002, CDM Inc., CDM Project No. 19947-34068-RI-FS
5. Evaluation of Terrestrial Ecological-Based Cleanup Levels, Former Sheriff's Pistol Range, Paine Field, Snohomish County, Washington, January 3, 2007, CDM Inc., CDM Project No., 19947.53813.TEE
6. Memo; Review of the January 3, 2007 Version of the Evaluation of the Terrestrial-Based Cleanup Levels for the Former Sheriff's Pistol Range, Paine Field, Snohomish County, Washington, January 11, 2007, Dave Sternberg, Ecotoxicologist, TCP HQ Policy and Technical Unit

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):

- Lead (Pb) in Soil, Surface Water and Sediments ;

The Site is more particularly described in Enclosures A-C 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) conducted 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 contamination at the Site.** Therefore, pursuant to WAC

Ms. Susan Penoyar, P.E.  
February 22, 2007  
Page 3

173-340-515(5), Ecology is issuing this opinion that **no further remedial action is necessary** at the Site under MTCA.

Based on this no further action determination, Ecology will update the status of the Site on its site database and initiate the process for removing the Site from the Hazardous Sites List (HSL). Before deciding to remove the Site from the HSL, Ecology must first provide the public with notice and an opportunity to comment. If the Site is removed from the HSL, the Site will also be removed from the Confirmed and Suspected Contaminated Sites List.

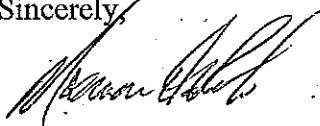
This no further action determination does not apply to any other release(s) or potential release(s) of contaminant(s) that may impact any other portion of any property impacted by this Site, or any other property owned or operated by Snohomish County, the Snohomish County Public Works Department or the Snohomish County Sheriff's Department.

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 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 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 successfully completing cleanup under the Voluntary Cleanup Program (VCP). If you have any questions regarding this opinion, please contact me at 425-649-7047.

Sincerely,



Norman D. Peck  
NWRO Toxics Cleanup Program

NP:nr

Enclosures: 3

## **Paine Field Sheriff Pistol Range Site to be removed from the Hazardous Site List**

The Washington State Department of Ecology (Ecology) proposes to remove the Paine Field Sheriff Pistol Range site from the Hazardous Sites List. The address of the site is 3220 100<sup>th</sup> Ave SW, Everett, Washington.

The Paine Field Sheriff Pistol Range site was cleaned up under the Voluntary Cleanup Program (VCP). Under the VCP, property owners can clean up their own property to meet the requirements of the Model Toxics Control Act (MTCA) with technical and regulatory review assistance from Ecology.

### **Ecology Wants Your Input**

Ecology has determined that the cleanup work at this site meets the requirements of the Model Toxics Control Act and therefore does not pose a threat to human health or the environment. Ecology proposes to remove the site from the Hazardous Sites list and seeks your input.

#### **You are invited to:**

Review the No Further Action Letter. Send your comments in writing to Ecology for consideration. Comments may be sent by mail or e-mail, with "**Paine Field Sheriff Pistol Range**" in the subject line.

**Comments will be accepted from November 13 – December 14, 2009**

### **Comments Accepted**

**November 13 – December 14, 2009**

#### **Submit Comments and Technical Questions to:**

Russ Olsen, Voluntary Cleanup Unit Supervisor  
Washington State Department of Ecology  
Northwest Regional Office - Toxics Cleanup Program  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008  
Phone: (425) 649-7038  
E-mail: [rols461@ecy.wa.gov](mailto:rols461@ecy.wa.gov)

#### **Document review locations**

**Washington State Department of Ecology  
Northwest Regional Office**  
3190 160<sup>th</sup> Ave SE  
Bellevue, WA 98008

Call for an appointment: Sally Perkins  
Phone: (425) 649-7190  
Fax: (425) 649-4450  
E-mail: [sper461@ecy.wa.gov](mailto:sper461@ecy.wa.gov)  
Hours: Tuesday – Thursday  
8:00 AM – 12:00 PM and 1:00 PM – 4:30 PM

#### **Ecology's Toxics Cleanup Website**

**[http://www.ecy.wa.gov/programs/tcp/sites/paineField/paineField\\_hp.html](http://www.ecy.wa.gov/programs/tcp/sites/paineField/paineField_hp.html)**

**Facility Site ID #: 15848557**

## Site Background

The Paine Field Sheriff Pistol Range site is located on the west side of Paine Field between the Mukilteo Speedway and the Paine Field main north-south runway. This property is zoned as light industrial.

The pistol range was established by the Air Force in 1950. Paine Field was an Air Force base until it was acquired by Snohomish County in 1966. Beginning in 1969, the Snohomish County Sheriff's Department operated the range, and other local and state agencies were allowed to use this range. Former components of the Sheriff's Pistol Range included an office building with an attached storage shed, tower, firing lines and impact slope, and a "tirehouse." The shooting range ceased operations in 1997.

Based on available information, Ecology added the property to the Hazardous Site List in 1997 for lead and arsenic contamination in soil. The site was selected for a Site Hazard Assessment (SHA) and subsequent ranking by the Washington Ranking Method (WARM). The site was given a WARM ranking of "3" and placed on the Washington State Hazardous Sites List. This ranking is based on a scale of 1 to 5 where "1" represents the highest relative risk, and "5" represents the lowest relative risk. This ranking is designed to estimate the potential threat to human health and the environment relative to all other sites in Washington State.

## What Was Done to Clean Up The Site?

Snohomish County Department of Public Works (SCDPW) conducted remedial actions and retained Camp Dresser & McKee Inc. (CDM) to oversee and confirm the adequacy of such actions. Site remediation was conducted under the Washington

State Department of Ecology's Voluntary Cleanup Program (VCP).

In 2002, CDM completed a remedial investigation and feasibility study (RI/FS) for the site. Elevated concentrations of lead above background levels were identified in soils within the firing line and impact slope as well as wetland soils and wetland drainage channel located downstream from the primary impact area. Elevated concentrations of arsenic and antimony were also present. Chemicals of Primary Concern (COPC) detected in soil above state cleanup levels were lead, antimony, and arsenic.

CDM also completed a site-specific terrestrial ecological evaluation (TEE) of the site. A site-specific lead cleanup level of 120 ppm was selected based on current literature values published by the US EPA. This is lower than the human health cleanup level of 250 ppm. Supporting studies included wetland and mitigation reports prepared by Snohomish County Public Works. Wetland remediation included the removal of contaminated soils from approximately 15,000 square feet of wetland. Excavated soils were replaced with clean topsoil and the wetland and impacted buffers were planted with trees and shrubs. A total of 16,500 square feet of wetland and 20,000 square feet of buffer were planted to compensate for project related wetland impacts.

Remedial activities included excavating and disposing of metals contaminated soils, conducting confirmation soil sampling, and stabilizing the metals in soils when needed.

The contaminated soil that was above the established cleanup level was removed, and disposed in a permitted landfill during June

2007. Final confirmation samples determined that lead, antimony and arsenic concentrations met their respective state cleanup levels. Under the VCP, Ecology issued a No Further Action for this site based on the technical information provided.

**What Happens Next?**

After the 30-day public comment period, Ecology will review all comments received and make recommendations for any suggested

changes to delisting the site from the Hazardous Sites List. If no significant changes are necessary, the site will be delisted.

A public meeting has not been scheduled at this time. However, one will be held if ten or more people request a meeting during the comment period. Please contact Nancy Lui to request a meeting at [nlui461@ecy.wa.gov](mailto:nlui461@ecy.wa.gov) or at (425) 649-7117.

**Paine Field Sheriff Pistol Range Site Map**  
3220 100<sup>th</sup> Ave SW, Everett, Washington





DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**3190 160<sup>th</sup> Ave SE  
Bellevue, WA 98008**



Please recycle.

---

**Paine Field Sheriff Pistol Range  
Snohomish County, WA**

**Ecology Seeks Public Comment on delisting the site from the Hazardous Site List**

**Public Comment Period  
November 13, 2009 - December 14, 2009**

Facility Site ID #: 15848557

---

If you need this publication in an alternative format, call Nancy Lui at (425) 649-7117.  
Persons with hearing loss, call 711 for Washington Relay Service.  
Persons with speech disability call 877-833-6341.

---