

PETROLEUM SERVICES UNLIMITED, INC.
1081 COLUMBIA BLVD.
LONGVIEW, WASHINGTON 98632
(206) 423-2245 • FAX # (206) 423-2272

March 18, 1991

RECEIVED

Mr. Steve Halme
Evergreen School District
13905 N. E. 28th Street
Vancouver, Washington 98682-8099

'91 MAR 28 P3:13

DEPARTMENT OF ECOLOGY
S W REGIONAL OFFICE

Dear Mr. Halme:

Petroleum Services Unlimited, Inc. is pleased to provide the enclosed documentation regarding the decommissioning of your two underground storage tanks. Enclosed you will find the following documentation:

- o Underground storage tank 30 day notice of intent to close/decommission tanks.
- o Underground storage tank permanent closure/change in service checklist.
- o Underground storage tank site check/site assessment checklist.
- o Chemical analytical data and site sketch.

A copy of all documentation has been forwarded to the Washington Department of Ecology with a copy of this letter. The State will review the data and will notify you if additional information is needed to obtain a closure notice regarding these tanks. If you do not hear from the state keep these records on file for three years and assume approval from the State for closure.

The following steps were taken to complete the tank decommissioning project:

- o The top of the 2000 gallon gasoline tank was uncovered and a man way was cut into the tank with an air saw.
- o The 2000 gallon tank was entered under level B protective equipment and cleaned of all residue and sludge.
- o The 8,000 gallon tank was entered through an existing manway and cleaned of all residue and sludge, using level B protective equipment.

Following the cleaning of the two underground storage tanks soil samples were collected from the soils directly under

each storage tank. The following procedures were used for soil sample collection:

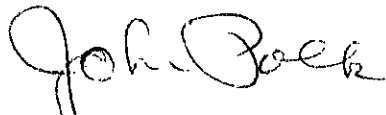
- o Three holes were cut in the bottom of the eight thousand gallon tank. One on each end and one in the center, two were cut in the two thousand gallon tank at each end.
- o A stainless steel trowel was used to collect soil from the openings.
- o Each soil sample was placed into a pre-labeled glass sample container provided by the laboratory.
- o Each soil sample was placed under chain of custody and placed into an insulated chest at about four degrees Celsius and hand carried to the laboratory.

The samples were analyzed at Columbia Analytical Services, Inc. in Kelso Washington for total petroleum hydrocarbons method 8015/modified. One sample from the two thousand gallon tank ESD-SS4-N shown on the attached site sketch indicated oil contamination at 140 parts per million. A composite sample from the stockpiled soils which was created to uncover the top of the two thousand gallon tank indicated kerosene contamination at 55 parts per million. Kerosene was identified as a fuel hydrocarbon which most closely matched kerosene, old weatherized gas also falls into this category. All remaining samples were below the laboratory method reporting limit. A copy of the laboratory analytical results and chain-of-custody are attached.

Based on the laboratory analytical results the tanks were slurried in place with a sand slurry mix, which was pumped directly into the tanks. The man ways that were used to enter the tanks was backfilled and brought to grade.

Thank you for allowing Petroleum Services to provide underground storage tank services to the School district and feel free to call if you require additional services in the future. If you have any questions or would like additional information feel free to give me a call.

Sincerely,



John R. Polk
Environmental Manager

cc: Tom Todd, Dept of Ecology

encl

COUGAR JUNIOR HIGH SCHOOL

ESD-SS5-M

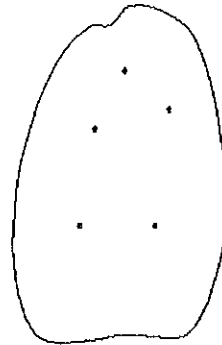
X

2000 GALLON
GASOLINE



ESD-SS4-N

X



SOIL STOCKPILE

* COMPOSITE
SOIL SAMPLE
LOCATIONS
ESD-SS6-S

X

ESD-SS3-S

8000 GALLON OIL TANK



X

ESD-SS2-M

X

ESD-SS1-N

EVERGREEN SCHOOL DISTRICT
13909 N.E. 28 TH STREET
VANCOUVER, WASHINGTON 98692

Figure 1

Site Location

Petroleum Services Unlimited, Inc.

**Columbia
Analytical
Services^{INC.}**

March 11, 1991

John Polk
Petroleum Services Unlimited, Inc.
1081 Columbia Blvd.
Longview, WA 98632

Re: **Evergreen Project**

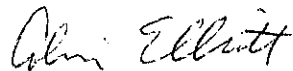
Dear John:

Enclosed are the results of the rush soil samples submitted to our lab on March 6, 1991. Preliminary results were transmitted via facsimile on March 10, 1991. For your reference, our service request number for this work is K911200.

Please call if you have any questions.

Respectfully submitted,

Columbia Analytical Services, Inc.



Colin B. Elliott
Senior Project Chemist

CBE/das

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client: Petroleum Services Unlimited, Inc.
 Submitted By: John Polk
 Project: Evergreen
 Sample Matrix: Soil

Date Received: 03/06/91
 Date Extracted: 03/08/91
 Date Analyzed: 03/09/91
 Work Order #: K911200

Hydrocarbon Scan
 EPA Methods 3550/Modified 8015
 mg/Kg (ppm)
 Dry Weight Basis

Sample Name	Lab Code	MRL	Diesel	Jet Fuel	Gasoline	Kerosene	Mineral Spirits	Oil*
ESD-SS1-N	K1200-1	10	ND	ND	ND	ND	ND	ND
ESD-SS2-M	K1200-2	10	ND	ND	ND	ND	ND	ND
ESD-SS3-S	K1200-3	10	ND	ND	ND	ND	ND	ND
ESD-SS4-N	K1200-4	10	ND	ND	ND	ND	ND	140
ESD-SS5-M	K1200-5	10	ND	ND	ND	ND	ND	ND
ESD-SS6-S	K1200-6	10	ND	ND	ND	**55	ND	ND
Method Blank	K1200-MB	10	ND	ND	ND	ND	ND	ND

MRL Method Reporting Limit

* Quantitated using hydraulic oil as a standard. The MRL for oil is five times the MRL shown above.

ND None Detected at or above the method reporting limit

** Unidentified fuel hydrocarbon which most closely matched kerosene

Approved by John Elliott Date 3/11/91

COLUMBIA ANALYTICAL SERVICES, INC.

Client: Petroleum Services Unlimited, Inc.
Submitted By: John Polk
Project: Evergreen
Sample Matrix: Soil

Date Received: 03/06/91
Date Extracted: 03/08/91
Date Analyzed: 03/09/91
Work Order #: K911200

QA/QC Report
Surrogate Recovery Summary
Hydrocarbon Scan
EPA Methods 3550/Modified 8015

Sample Name	Lab Code	Percent Recovery <i>p</i> -Terphenyl
ESD-SS1-N	K1200-1	107
ESD-SS2-M	K1200-2	105
ESD-SS3-S	K1200-3	95.2
ESD-SS4-N	K1200-4	98.9
ESD-SS5-M	K1200-5	99.1
ESD-SS6-S	K1200-6	76.4
Method Blank	K1200-MB	108
	CAS Acceptance Criteria	64-123

Approved by Colin Elliott Date 3/11/91



UNDERGROUND STORAGE TANK

30 Day Notice of Intent to Close/Decommission Tanks

The purpose of this form is to provide the Department of Ecology with notice of intent to close/decommission an UST. It must be received 30 days prior to the closure activities. It must be signed and dated by either the owner/operator of the UST to be closed or his/her authorized representative. (This could be the firm contracted to do the work.) Ecology will notify the identified person of the earliest date closure/decommissioning activities may commence.

For questions on completing this form please call (206) 459-6293.

Please type or use ink.

The completed checklist should be mailed to:

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

1. TANK OWNER AND LOCATION

UST Owner/Operator: EVERGREEN SCHOOL DISTRICT

Owners Mailing Address: 13905 N.E. 28TH STREET
Street
VANCOUVER WA 98682-8099
City State ZIP-Code

Telephone: (206) 256-6078

Site ID Number (on invoice or available from Ecology if tank is registered): 000144

Site/Business Name: _____

Site Address: 13909 N.E. 28TH CLARK
Street County
VANCOUVER WA 98682
City State ZIP-Code

2. TANK PERMANENT CLOSURE TO BE PERFORMED BY (if known):

Firm: PS41

Address: 1001 COLUMBIA BLVD
Street
LONGVIEW WA 98632
City State ZIP-Code

Telephone: (206) 423-2245 Contact Name: JOHN POIK

3. TANK INFORMATION

Tank Identification	Approx. Closure Date	Tank Capacity (gallons)	Tank Age (years)	Last Substance Stored
# 1	MARCH 5 1991	5,000	6-10	gasoline
# 2	MARCH 5 1991	8,000	6-10	1/2 diesel

4. SIGNATURE OF TANK OWNER/OPERATOR OR AUTHORIZED REPRESENTATIVE:

John Poik ENVIRON Mgr 2/4/91
Signature Title Date



UNDERGROUND STORAGE TANK Permanent Closure/Change-In-Service Checklist

The purpose of this form is to certify the proper closure/change-in-service of underground storage tank (UST) systems. These activities must be conducted in accordance with Chapter 173.360 WAC. Washington State UST rules require the tank owner or operator to notify Ecology in writing 30 days prior to closure or change-in-service of tanks. This must be done by completing the 30 Day Notice form (ECY 010-155).

This Permanent Closure Checklist shall be completed and signed by a Licensed Decommissioning Supervisor. The supervisor shall be on site when all tank permanent closure/change-in-service activities are being conducted. The firm which employs the licensed supervisor shall also be licensed by the Washington State Department of Ecology as a Service Provider. If any of the activities listed below have been supervised by a different licensed supervisor, a separate checklist must be filled out and signed by the licensed supervisor performing those activities.

For further information about completing this form, please contact the Department of Ecology UST Program.

A separate checklist must be completed for each UST system (tank and associated piping), except that UST systems at one site may be reported together by completing page 2 of this form separately for each system. The completed checklist should be mailed to the following address within 30 days of the completion of the closure or change-in-service.

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

1. UST SYSTEM OWNER AND LOCATION

Site Owner/Operator: EVERGREEN School DISTRICT

Owners Address: 13905 N.E. 28TH ST.
Street
VANCOUVER WA. 98682-8099
City State P.O. Box ZIP-Code

Telephone: (206) 256-6078

Site ID Number (on invoice or available from Ecology if tank is registered): 000144

Site/Business Name: _____

Site Address: 13909 N.E. 28TH CLALLAM
Street County
VANCOUVER WA. 98682-8099
City State P.O. Box ZIP-Code

2. TANK PERMANENT CLOSURE/CHANGE-IN-SERVICE PERFORMED BY:

Firm: PETROLEUM SERVICES UN License Number: 395

Address: 1081 Columbia Blvd.
Street
LONGVIEW WA. 98632
City State P.O. Box ZIP-Code

Telephone: (206) 423-2245

Licensed Supervisor: JOHN R. POIK Decommissioning License Number: W000197

3. TANK INFORMATION

1. Tank ID Number (as registered with Ecology): 2 2. Year installed: UNK
3. Tank capacity in gallons: 8000 4. Last substance stored: HEATING OIL

4. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

- Investigate suspected release due to on-site environmental contamination
- Investigate suspected release due to off-site environmental contamination
- Extend temporary closure of UST system for more than 12 months
- UST system undergoing change-in-service
- UST system permanently closed-in-place
- UST system permanently closed with tank removed
- Required by Ecology or delegated agency for UST system closed before December 22, 1988
- Other (describe): _____

5. CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.

	Yes	No
1. Has the site check/site assessment been conducted according to applicable procedures specified in the UST site check/site assessment guidance issued by the Department of Ecology?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Has a release from the UST system been confirmed? <i>NOTE: Owners/operators must report all confirmed releases to the Department of Ecology or delegated agency within 24 hours.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Are the results of the site check/site assessment enclosed with this checklist? <i>NOTE: Two copies of the site check/site assessment results must be submitted to the Department of Ecology according to the reporting requirements specified in the UST site check/site assessment guidance.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

3-18-91
Date

[Signature]
Signature of Person Registered with Ecology

6. OWNER'S SIGNATURE

3.21.91
Date

[Signature]
Signature of Tank Owner or Authorized Representative

This page must be completed separately for each tank permanently closed (decommissioned) or change-in-service at the site. For additional tanks you may photocopy this form prior to completing.

3. TANK CLOSURE/CHANGE-IN-SERVICE INFORMATION

1. Tank ID Number (as registered with Ecology): _____ 2. Year installed: UNK

3. Tank capacity in gallons: 8000 4. Date of last use: _____

5. Last substance stored: HEATING OIL 6. Date of closure/change-in-service: _____

7. Type of closure: Closure with Tank Removal In-place Closure Change-in-Service

8. If in-place closure is used, the tank has been filled with the following substance: SAND SLURRY

9. If change-in-service, indicate new substance stored in tank: N/A

10. Local permit(s) (if any) obtained from: _____

Always contact local authorities regarding permit requirements.

11. Has a site assessment been completed? Yes No

Unless an external release detection system is operating at the time of closure or change in service, and a report is provided as specified in WAC 173-360-390, a site assessment must be conducted. This site assessment must be conducted by a person registered with the Department of Ecology to perform site assessments. Results of the site assessment must be included with the Site Assessment Checklist (ECY 010-158).

4. CHECKLIST

Each item of the following checklist shall be initialed by the licensed supervisor whose signature appears below.

	Yes	No	NA*
1. Has all liquid been removed from product lines?	JP		
2. Has all product piping been capped or removed?	JP		
3. Have all non-product lines been capped or removed?	JP		
4. Have all liquid and accumulated sludges been removed from the tank?	JP		
5. Has the tank been properly purged or inerted?	JP		
6. Have the drop tube, fill pipe, gauge pipe, pumps and other tank fixtures been removed?	JP		
7. Have all tank openings been plugged or capped? NOTE: One plug should have 1/8 inch vent hole.	JP		
8. Have all sludges removed from the tank been designated and disposed of in accordance with the state of Washington's dangerous waste regulations (Chapter 173-303 WAC)?			JP
9. If removed, was tank properly labeled and disposed of in accordance with all applicable local, state and federal regulations?			JP

*Item not applicable

I hereby certify that I have been the licensed supervisor present on site during the above listed permanent closure activities and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures pertaining to underground storage tanks.

Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

3-18-91 Date John Bell Signature of Licensed Supervisor

5. ADDITIONAL REQUIRED SIGNATURES

3-18-91 Date John Bell Signature of Licensed Service Provider (firm) Owner or Authorized Representative

3-21-91 Date [Signature] Signature of Tank Owner or Authorized Representative

This page must be completed separately for each tank permanently closed (decommissioned) or change-in-service at the site. For additional tanks you may photocopy this form prior to completing.

3. TANK CLOSURE/CHANGE-IN-SERVICE INFORMATION

1. Tank ID Number (as registered with Ecology): _____ 2. Year installed: _____
 3. Tank capacity in gallons: 2000 4. Date of last use: _____
 5. Last substance stored: GASOLINE 6. Date of closure/change-in-service: _____
 7. Type of closure: Closure with Tank Removal In-place Closure Change-in-Service
 8. If in-place closure is used, the tank has been filled with the following substance: SAND SLURRY
 9. If change-in-service, indicate new substance stored in tank: N/A
 10. Local permit(s) (if any) obtained from: _____

Always contact local authorities regarding permit requirements.

11. Has a site assessment been completed? Yes No

Unless an external release detection system is operating at the time of closure or change in service, and a report is provided as specified in WAC 173-360-390, a site assessment must be conducted. This site assessment must be conducted by a person registered with the Department of Ecology to perform site assessments. Results of the site assessment must be included with the Site Assessment Checklist (ECY 010-158).

4. CHECKLIST

Each item of the following checklist shall be initialed by the licensed supervisor whose signature appears below.

	Yes	No	NA*
1. Has all liquid been removed from product lines?	<i>JS</i>		
2. Has all product piping been capped or removed?	<i>JS</i>		
3. Have all non-product lines been capped or removed?	<i>JS</i>		
4. Have all liquid and accumulated sludges been removed from the tank?	<i>JS</i>		
5. Has the tank been properly purged or inerted?	<i>JS</i>		
6. Have the drop tube, fill pipe, gauge pipe, pumps and other tank fixtures been removed?	<i>JS</i>		
7. Have all tank openings been plugged or capped? NOTE: One plug should have 1/8 inch vent hole.	<i>JS</i>		
8. Have all sludges removed from the tank been designated and disposed of in accordance with the state of Washington's dangerous waste regulations (Chapter 173-303 WAC)?			<i>JS</i>
9. If removed, was tank properly labeled and disposed of in accordance with all applicable local, state and federal regulations?			<i>JS</i>

*Item not applicable

I hereby certify that I have been the licensed supervisor present on site during the above listed permanent closure activities and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures pertaining to underground storage tanks.

Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

Date: 3-18-91 Signature of Licensed Supervisor: *John P. [Signature]*

5. ADDITIONAL REQUIRED SIGNATURES

Date: 3-18-91 Signature of Licensed Service Provider (firm) Owner or Authorized Representative: *[Signature]*
 Date: 3.21.91 Signature of Tank Owner or Authorized Representative: *[Signature]*

3. TANK INFORMATION

1. Tank ID Number (as registered with Ecology): 1 2. Year installed: UNIC
3. Tank capacity in gallons: 2000 4. Last substance stored: GASOLINE

4. REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

- Investigate suspected release due to on-site environmental contamination
- Investigate suspected release due to off-site environmental contamination
- Extend temporary closure of UST system for more than 12 months
- UST system undergoing change-in-service
- UST system permanently closed-in-place
- UST system permanently closed with tank removed
- Required by Ecology or delegated agency for UST system closed before December 22, 1988
- Other (describe): _____

5. CHECKLIST

Each item of the following checklist shall be initialed by the person registered with the Department of Ecology whose signature appears below.

	Yes	No
1. Has the site check/site assessment been conducted according to applicable procedures specified in the UST site check/site assessment guidance issued by the Department of Ecology?	<i>JD</i>	
2. Has a release from the UST system been confirmed? <i>NOTE: Owners/operators must report all confirmed releases to the Department of Ecology or delegated agency within 24 hours.</i>		<i>JD</i>
3. Are the results of the site check/site assessment enclosed with this checklist? <i>NOTE: Two copies of the site check/site assessment results must be submitted to the Department of Ecology according to the reporting requirements specified in the UST site check/site assessment guidance.</i>	<i>JD</i>	

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

3-18-91
Date

John Ober
Signature of Person Registered with Ecology

6. OWNER'S SIGNATURE

3.21.91
Date

[Signature]
Signature of Tank Owner or Authorized Representative



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

February 8, 1991

Mr. John Polk
Petroleum Services Unlimited, Inc.
1081 Columbia Blvd.
Longview, WA 98632

Dear Mr. Polk:

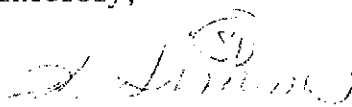
This is to acknowledge receipt of your 30-day notice of intent to close underground storage tank(s) located at 13909 N.E. 28th, Vancouver, Washington.

We received your letter on February 7, 1991.

Your 30-day notice has been forwarded to the appropriate regional office. Field people with the Underground Storage Tank Program may visit your site within the 30-day period. However, with the many tank closures now taking place, it will not be possible to visit every site. If you have not been contacted by the time thirty days have elapsed from the date we received your notice letter (noted above), you may proceed with closure.

If you did not request a full closure packet, but would like to receive one, you may do so by calling 1-800-826-7716 (in Washington state only) or 206-459-6293. This closure packet contains a form entitled "Notice of Permanent Closure of Underground Storage Tank(s)". For your convenience, we have enclosed a copy of this form. Please complete this form and return it to the Department of Ecology when tank closure is complete.

Sincerely,


Sue L. Simms
Regulatory Specialist

SLS:sd

Enclosure



CHRISTINE O. GREGOIRE
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

March 18, 1991

Mr. Steve Halme
Evergreen School District
13905 N.E. 28th Street
Vancouver, Washington 98682-8099

Re: **Requirements for Reporting Environmental Conditions at LUST Contaminated Sites**

Dear Mr. Halme:

Thank you for reporting to the Department of Ecology (Ecology) the fact that you have found contamination due to a Leaking Underground Storage Tank (LUST) at the **Evergreen School District, 13905 N.E. 28th Street, Vancouver, Washington**. Your report was required under regulations [Chapter 173-340 Washington Administrative Code (WAC)] adopted under the authority of the Model Toxics Control Act [Chapter 70.105D Revised Code of Washington (RCW)] or Initiative 97. The purpose of this letter is to outline the remaining requirements, with which you must comply, in order to satisfy the regulation. For your reference, a copy of the appropriate part (-450) of the regulation is enclosed. Also, I want to discuss with you the nature of the relationship between you and Ecology. This relationship is spelled out in the regulation, and in Ecology's policies for implementing the law and regulation. In advance, I apologize for the technical nature of this letter, but it must be so in order to give you a complete picture of what must be done in the near future at your site in order to meet the requirements of the law and regulation.

Cooperation with Ecology

The Model Toxics Control Act (MTCA) does encourage all investigations/cleanups which are protective of human health and the environment. It is the policy of Ecology to work cooperatively with potentially liable persons to accomplish prompt and effective cleanups. Cooperating with Ecology in planning or conducting a remedial action is not an admission of guilt or liability. However, Ecology's ability to work closely with the many sites such as yours, of which we are aware is very limited. The MTCA, and its implementing regulation, mentioned above, specify two methods by which cleanups can occur. These are:

- 1) an independent cleanup with little or no oversight from Ecology, or
- 2) investigate/cleanup with regulatory and technical oversight and review.

The first option allows property owners or operators to make all of the decisions concerning the investigation/cleanup and they retain all liability. The second option allows for technical and regulatory review by Ecology and is formalized by a consent decree or order under Chapter

70.105D RCW. Covenants not to sue are available within the consent decree process. However, under these formal processes, Ecology's costs for oversight will need to be recovered from you. Unless you specifically request that the process move forward under a consent decree or order we will assume that you will cleanup as an independent.

Penalty Provisions

You should be aware that if the reports detailed below are not received in a timely manner or if Ecology determines that your actions are not sufficient Ecology may decide to:

- * Conduct emergency cleanup
- * Issue enforcement action
- * Negotiate cleanup agreement, or
- * Rank site for future action

Persons who fail to comply with the regulations may be liable for up to three times Ecology's costs, and up to \$25,000 penalty per day.

Actions Required Within 24 Hours

As you are already aware, when a release from an underground storage tank has been confirmed, you must report this fact to Ecology within 24 hours. Further requirements to be accomplished within the first 24 hours are:

- 1) You must remove the hazardous substances (including petroleum products) from the tank.
- 2) You must eliminate fire or explosion hazards.
- 3) Finally, within this 24-hour period you must visually inspect any aboveground or exposed belowground releases and prevent their spreading.

These requirements should have already been met.

20 Day Report

As soon as possible, but within 20 days of the release, there are several interim actions required:

- 1) You must monitor and mitigate additional fire and safety hazards.
- 2) You must reduce the threat to human health and the environment posed by the contaminated soils that you have found.
- 3) You must test for hazardous substances. You must prepare a sampling plan. Included in the table below are Ecology's requirements and recommendations on which EPA test methods to use for each contaminant of concern. You must test for each of these contaminants. At a minimum, you must test for:

Gasoline-range Organic Compounds

Required Analysis	Soil Method	Water Method
BTEX	8020 or 8240	602 or 624
TPH	8015 modified	8015 modified
Total Lead	6010, 7420, or 7421 ¹	
Dissolved Lead		7421 ¹

Diesel-range Compounds

TPH	8015 modified	8015 modified
-----	---------------	---------------

Petroleum Compounds heavier than Diesel

TPH	418.1 modified	418.1 modified
-----	----------------	----------------

Note: (TPH = Total Petroleum Hydrocarbons)
 (BTEX = Benzene, Ethylbenzene, Toluene, and Xylenes)

Recommended Analyses

Depending on the product characteristics, and the nature and extent of contamination, the following additional tests should be considered and may be required by the Ecology Site Manager.

Analysis	Method	Gasoline	Waste Oils
Flash Point	1010 or 1020	Product	
TCLP ²	1311	Soil	Soil
EDB	504	Water	
PCB's	608		Water
	8080		Soil
Dissolved Metals (lead, chromium, copper, & zinc)	6010 & 7000 series		Water
Volatile Organics	601 & 602 OR 624		Water
	8010 & 8020 OR 8240		Soil
Phenols	604 or 625		Water
	8040 or 8270		Soil
PAH's	610 or 625		Water
	8100 or 8270		Soil

¹Not required if only unleaded gasoline is present.

²TCLP is not required for soils contaminated by leaks from a UST; however this exemption does not apply for other sources of petroleum contamination. The most obvious contaminants to look for in the TCLP are benzene and lead.

- * The requirements for how to test are in the enclosed regulation in WAC 173-340-450(3)(a)(iii) through (v). You would be well advised to get someone who knows exactly what they are doing to collect these samples for you. In more than one occasion, projects such as yours were made needlessly more expensive by improper sampling.
- 4) You must conduct a free product investigation. At sites where free product is found floating on the ground water table, you must start removing it.
 - 5) Finally, you must, still within 20 days, make a status report to Ecology. The requirements for the content of that status report are contained in WAC 173-340-450(4)(a). You may make this report verbally or telephonically.

No later than 90 days after the release, a site characterization report is due. If the information is available sooner, you are encouraged to submit it when available. The required elements for this report are included in WAC 173-340-450 (4)(b). Briefly these are:

- 1) All of the information in the 20 day status report;
- 2) A site conditions map;
- 3) Available data regarding the possible fate and transport conditions of the contaminant [WAC 173-340-450(4)(b)(iii)] gives a list of items to be covered;
- 4) Results of the sampling done above;
- 5) Results of the free product investigation;
- 6) Results of all completed site investigations, interim actions and cleanup actions, as well as your plans to finish the cleanup; and
- 7) Information on free product removal. The total amount of information needed to complete this section is also in WAC 173-340-450(4)(b)(vii)(A) through (G).

If ground water is threatened or impacted, a remedial investigation and feasibility study will be required. The WAC addresses this possibility in greater detail than this letter can address. If this becomes necessary, please contact me for further guidance.

Cleanup Standards

The question of "How clean is clean?" is addressed by the table of Cleanup Standards below. If your site's test results are below these numbers, the site is below Ecology's level of concern. If the results are above these numbers, site cleanup is required.

Contaminant	Constituent	Ground Water Cleanup Level	Soil Cleanup Level
Gasoline	Benzene	5.0 ug/l*	0.5 mg/kg*
	Ethylbenzene	20.0 ug/l	20.0 mg/kg
	Toluene	40.0 ug/l	40.0 mg/kg
	Total Xylenes	20.0 ug/l	20.0 mg/kg
	Total Petroleum Hydrocarbons	1000.0 ug/l	100.0 mg/kg
	Lead	5.0 ug/l	250.0 mg/kg
Diesel	Total Petroleum Hydrocarbons	1000.0 ug/l	200.0 mg/kg
Waste Oil	Total Petroleum Hydrocarbons	1000.0 ug/l	200.0 mg/kg

- * ug/l is the equivalent of ppb (parts per Billion)
- mg/kg is the equivalent of ppm (parts per Million)
- * Waste oil and other hazardous substances will be addressed on a site specific basis, for the question of what is considered clean.

The numbers above are cleanup standards taken from WAC 173-340-700 through 750. According to the regulation you may, alternatively, propose different cleanup standards based upon mathematical calculations that are described in the regulations. These calculations involve using toxicity data to do a health based risk assessment. If you wish to propose alternate cleanup levels, please call me for a copy of the appropriate regulation and guidance.

Financial Assistance

You should also be aware that financial assistance for cleanups is sometimes available in the form of cost sharing or mixed funding. The circumstances under which these funds will become available is if 1) the cleanup would be done faster by this method than if done by you alone; and 2) the funding will prevent an undue hardship on you. An undue hardship is generally defined as bankruptcy or insolvency. You will need to enter into a Consent Decree with Ecology to receive these funds. The state cannot pay for previous cleanup work already performed, routine tank closures, or tank improvements. To request financial assistance you should call me to get the proper application form, complete the application form, and attach tax records for the past 3 years. The information provided will be run through a computer program that will help us determine eligibility for cost sharing.

Other Governmental Contacts

Several issues that you will deal with in the conduct of this cleanup are under the purview of other governmental agencies. The contaminated soils that are on the property are usually considered solid waste, as opposed to hazardous waste. In Washington the local Health Districts are the regulators of solid waste. Depending upon the method of remediation chosen, air pollution can be a concern. Three different air pollution authorities exist in this region and each has its own rules about

Steve Halme
March 18, 1991
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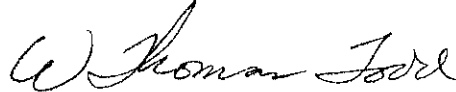
discharge of air pollutants from petroleum cleanup sites. Therefore you should contact the appropriate authority to assist in determining the correct remedial technique that you will choose. Below is the Health Department and Air Pollution Authority that have responsibility in your area and their contact persons.

Gary Bickett
Southwest Washington Health District
2000 Fort Vancouver Way
P.O. Box 1870
Vancouver, Washington 98663
(206) 695-9215

Jerry Strawn
Southwest Washington Air Pollution
Control Authority
1308 NE 134th Street, Suite D
Vancouver, Washington 98685
(206) 574-3058 or 1-800-633-0709

I am looking forward to hearing from you again in the near future. Please direct all reports and questions about this site to me. My telephone number is (206) 586-4689. The address is: 7272 Cleanwater Lane, Mail Stop LU-11, Olympia, Washington 98504.

Sincerely,



W. Thomas Todd
LUST Site Manager
Toxics Cleanup Program

WTT:fs
Enclosure

cc: John Polk
Gary Bickett
Jerry Strawn



UNDERGROUND STORAGE TANK

30 Day Notice of Intent to Close/Decommission Tanks

The purpose of this form is to provide the Department of Ecology with notice of intent to close/decommission an UST. It must be received 30 days prior to the closure activities. It must be signed and dated by either the owner/operator of the UST to be closed or his/her authorized representative. (This could be the firm contracted to do the work.) Ecology will notify the identified person of the earliest date closure/decommissioning activities may commence.

For questions on completing this form please call (206) 459-6293.

Please type or use ink.

The completed checklist should be mailed to:

Underground Storage Tank Section
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

DEPARTMENT OF ECOLOGY
UNDERGROUND STORAGE TANKS

FEB 07 1991

1. TANK OWNER AND LOCATION

UST Owner/Operator: EVERGREEN School District

Owners Mailing Address: 13905 N.E. 28TH STREET
Street
VANCOUVER WA 98682-8099
City State P.O. Box ZIP-Code

Telephone: (206) 256-6078

Site ID Number (on invoice or available from Ecology if tank is registered): 000144

Site/Business Name: _____

Site Address: 13909 N.E. 28TH
Street
VANCOUVER WA 98682
City State ZIP-Code
CLARK
County

2. TANK PERMANENT CLOSURE TO BE PERFORMED BY (If known):

Firm: PS41 Petroleum Services Unlimited, Inc.

Address: 1011 Columbia Blvd
Street
Longview WA 98632
City State P.O. Box ZIP-Code

Telephone: (206) 423-2245 Contact Name: Jon Poik

3. TANK INFORMATION

Tank Identification	Approx. Closure Date	Tank Capacity (gallons)	Tank Age (years)	Last Substance Stored
# 1	MARCH 5 1991	5,000	6-10	gasoline
# 2	MARCH 5 1991	8000	6-10	1/2 diesel

4. SIGNATURE OF TANK OWNER/OPERATOR OR AUTHORIZED REPRESENTATIVE:

John Poik Environ Mgr 2/4/91
Signature Title Date