



April 21, 2020

Washington State Department of Ecology  
Northwest Regional Office  
3190 160<sup>th</sup> Avenue SE  
Bellevue, Washington 98008.5452

Attn: Release Reporting Coordinator

Transmitted via e-mail to: [nwroerts@ecy.wa.gov](mailto:nwroerts@ecy.wa.gov)

**Re: Notification of Apparent Release  
Buse Timber & Sales, Inc. Facility  
Everett, Washington**

Dear Ecology Release Reporting Coordinator:

This letter is being submitted to notify the Washington State Department of Ecology (Ecology) of an apparent release to the environment at the Buse Timber and Sales, Inc. (Buse) facility in Everett, Washington, in adherence with Ecology's release reporting requirements.

## Background

In 2018, Umpqua Bank hired Terracon Consultants, Inc. (Terracon) to perform a limited site investigation (LSI) at the Buse facility. A copy of the LSI<sup>1</sup> report (attached), which includes information related to the apparent release, was only recently made available to Buse. Within the recommendations section of the report, Terracon made the following statement:

"With regards to the identified releases to soil exhibiting arsenic concentrations above MTCA action levels, a release report to Ecology is required per MTCA (Washington Administrative Code (WAC) 173-340-300 (2) (a)), which states: 'Any owner or operator, who has information that a hazardous substance has been released to the environment at the owner's or operator's facility and may be a threat to human health or the environment, shall report such information to the department within 90 days of discovery'."

It is not clear to Buse that the reported limited finding of arsenic in soil above regulatory cleanup levels represents a threat to human health and the environment; Buse understands that the Ecology - Policy 300 for Site Discovery – Reporting Releases (Policy 300) states:

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<sup>1</sup> Terracon Consultants, Inc., Limited Site Investigation, Buse Timber & Sales, 3812 28<sup>th</sup> Place Northeast, Everett, Snohomish County, Washington. September 17, 2018.

“When an environmental consultant recommends that a site be reported to Ecology, the owner/operator must report that site to Ecology.”

Therefore, per Policy 300, it is Buse’s understanding that Terracon’s statement in their report obligates Buse to report the apparent release to Ecology. This letter is being provided to Ecology to fulfill Buse’s release reporting obligations.

## Notification of Apparent Release to Environment

Per Policy 300, Buse provides the following required information related to the apparent release:

- **Name and address of the owner and operator of the site:**

Name of owner/operator:

Buse Timber & Sales, Inc.

Address:

3812 28<sup>th</sup> Place NE  
Everett, Washington 98201-8602

Facility contact:

Tom Parks, President  
Phone: 425-258-5840  
Fax: 425-259-6956  
Email: tomparks@busetimber.com

- **Location of the site:**

Address:

Buse Timber & Sales, Inc.  
3812 28th Place NE  
Everett, Washington 98201-8602

Latitude: 48° 1'16.75"N

Longitude: 122°10'35.23"W

- **Hazardous substances released and their location(s):**

Substance: Arsenic.

Location: Soil and groundwater at soil borings B1 and B2 (near Vehicle Maintenance Building)

- **Circumstances of the release and the discovery of the release:**

Circumstances of apparent release: Unknown. Terracon’s LSI report suggests that the elevated concentrations of arsenic at the facility are likely attributed to pesticides containing arsenic “that protect wood against termites, fungi and other pests that can degrade or threaten the integrity of wood products” and that wood treated with these pesticides may be “used to produce commercial wood shake, shingles, permanent foundation support beams and other wood products.”

It should also be noted that the facility is located less than 1 mile from the former Everett Smelter Site. While not within the “official” Everett Smelter Cleanup Site, the extent of arsenic-contaminated soil attributed to the former smelter has been identified within similar

distances to the northwest, west, and south of the former smelter's location. Therefore, it is possible that atmospheric deposition originating from the smelter may have contributed to the elevated arsenic concentrations identified at the Buse facility.

Discovery of apparent release: In 2018, Terracon performed an LSI at the Buse facility for Umpqua Bank that included drilling six soil borings (B1 – B6) in various locations at the facility and collecting soil and groundwater grab samples for laboratory analysis. Elevated arsenic concentrations were identified in soil from borings B1 and B2, and in groundwater at soil boring B2. Both borings are located near the Vehicle Maintenance Building on the east side of the facility.

- **Results of all remedial investigations and cleanup actions:**

According to Terracon's LSI report, laboratory analytical results for soil samples collected from soil borings B1 (2.5 feet [ft] below ground surface [bgs]) and B2 (3 ft bgs), contained arsenic at concentrations of 35 milligrams per kilogram (mg/kg) and 41 mg/kg, respectively, which are above the Model Toxics Control Act (MTCA) Method A soil cleanup level (20 mg/kg). Laboratory analytical results for a grab groundwater sample collected from soil boring B2 contained arsenic at a concentration of 77 micrograms per liter ( $\mu\text{g/L}$ ), which is above the MTCA Method A groundwater cleanup level (5  $\mu\text{g/L}$ ). Note, however, that the groundwater sample was collected from a temporary well screen placed in the soil boring, and the results are likely not representative of actual arsenic concentrations in groundwater. This is supported by Terracon's report which states:

"Please note that during sampling from temporary wells, groundwater often remains turbid and can contain suspended colloids, which may then be detected by the laboratory, potentially resulting in elevated contaminate concentrations. Therefore, without the benefit of permanent groundwater monitoring wells that are properly developed prior to groundwater sampling, groundwater analytical results may not be representative of actual on-site groundwater conditions".

Terracon also made the following conclusions and recommendations:

"Based on the findings of this investigation, it appears that the arsenic concentrations identified are consistent with the current site use. While there are arsenic exceedances to the MTCA cleanup level, Terracon infers that they are limited to the site soil and groundwater within the limits of the site boundary. Therefore, unless the site use is proposed to change, Terracon does not recommend any additional investigations at this time. For a further degree of confidence with regard to onsite groundwater conditions, permanent groundwater monitoring wells would be required, although not recommended at this time".

No cleanup actions have been performed or are planned related to this apparent release.

- **Results of compliance monitoring planned or underway:**

Consistent with Terracon's LSI report recommendations, no additional investigation, sampling, or monitoring has been performed at the facility.

- **Restrictive covenants:**

No restrictive covenant has been placed on the facility.

## Closing

This release notification letter is being provided to Ecology to fulfill Buse's release reporting obligations, based on the statement made in Terracon's LSI report that indicates that such a report is required. However, as indicated in Terracon's LSI report, "it appears that the arsenic concentrations identified are consistent with the current site use" and "Terracon infers that they are limited to the site soil and groundwater within the limits of the site boundary." Therefore, it is not clear to Buse that conditions resulting from the apparent release of arsenic represent a threat to human health and the environment under current site use.

If Ecology has any questions or needs any additional information, please feel free to contact the undersigned at your convenience at [tomparks@busetimber.com](mailto:tomparks@busetimber.com) or 425-258-5840.

Sincerely,  
Buse Timber & Sales, Inc.



Tom Parks  
President

Attachments: Terracon Consultants, Inc., Limited Site Investigation, Buse Timber & Sales, 3812 28th Place Northeast, Everett, Snohomish County, Washington. September 17, 2018.