



File

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

February 11, 2002

Mr. Robert Lauritzen  
EA Engineering  
1715 114<sup>th</sup> Avenue, SE, Suite 219  
Bellevue, WA. 98004

Dear Mr. Lauritzen:

RE: Voluntary Cleanup Program, BOC Gases Acetylene Plant, 7700 14<sup>th</sup> Ave. S, Seattle, Washington. VCP ID # NW0753

Thank you for submitting your Closure Report to Ecology for review. Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the BOC Gases Acetylene Plant, 7700 14<sup>th</sup> Ave. S, Seattle, Washington:

1. Lime Pond Closure Report – Soils VCP BOC GASES, 7700 14<sup>th</sup> Avenue, S, Seattle, WA. February 1, 2002, by EA Engineering, Science and Technology, Inc (EA), Project No. 12040.63 LN0417.

Based upon the above listed information Ecology has the following comments:

1. Section 1.0 Conclusions and Recommendations, paragraphs 2 and 3, page 3 “EA requests Ecology’s designate a “No Further Action (NFA)” status... An NFA without a restrictive covenant is warranted ...does not pose a current or future threat to human health and the environment” “Carbide lime is not designated as a Dangerous Waste...(WAC 173-303) with respect to ... corrosivity, toxicity, ignitability, and flammability.”

**Comment:** This may be true that the Carbide lime is not designated as a Dangerous Waste, however, as noted in your previous reports and correspondence with Ecology, the lime may be ‘actionable’ under MTCA if it is associated with high pH values that cause dissolution and mobilization of metals from soils during seasons of high water table when the groundwater comes in contact with the lime material at the site.

1. Since the additional wells have not been installed nor have you conducted the required groundwater compliance monitoring, we are unable to evaluate the completeness of the

Mr. Robert Lauritzen  
VCP Opinion Letter TCP ID# NW0753  
BOC Gases Acetylene Plant  
February 11, 2002

soil remedial action implemented at this site to meet groundwater stated objectives for metals. Based on your confirmational soil sampling results, pH concentrations greater than 11.2 are present at the bottom of the excavations and undetermined concentration and quantity of this material are left beneath building foundations. If compliance monitoring shows that the residual lime continues to pose a threat to the environment through metal mobilization from soils to the groundwater due to high soil pH concentration, a deed restriction and additional remedy to stabilize the pH maybe necessary. Ecology considers pH concentrations of 6.5 to 7 as stable or neutral that would not mobilize metals from soils to groundwater.

2. Please submit a groundwater compliance monitoring plan to Ecology for our review and approval. Quarterly groundwater quality analyses are needed for the first year to establish groundwater quality baseline data after the implementation of the remedial action at the site. This will allow for a meaningful comparison of the subsequent semi-annual (average) sampling proposed in your previous Work Plan. If the first year's four consecutive quarterly groundwater quality data for ph and subsequent metals are below state standards, additional monitoring will not be required and we will issue an NFA determination for both soil and groundwater at the site.

Please note that because your actions were not, or will not be conducted under a consent decree with Ecology, this letter is not a settlement by the state under RCW 70.105D.040(4) and is not binding on the agency. Further action could be required at your site regardless of how strictly you follow Ecology's advice.

The opinions presented by Ecology in this letter are made only with respect to the information provided in the report and document(s) listed above. This opinion is only applicable to the specified site (or area of site) and may not be used to justify action at another site (or area of the site.)

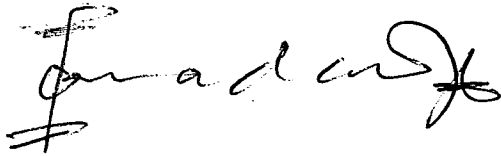
Ecology does not assume any liability for any release, threatened release or other conditions at the site, or for any actions taken or omitted by any person or his/her agents or employees with regard to the release, threatened release, or other conditions at the site.

Again, thank you for taking the initiative to voluntarily address the contamination at your site. Your efforts are recognized by Ecology as a positive step in our work to protect human health and the environment in Washington State.

Mr. Robert Lauritzen  
VCP Opinion Letter TCP ID# NW0753  
BOC Gases Acetylene Plant  
February 11, 2002

If you have any questions regarding this letter, please contact me at (425) 649-7112.

Sincerely,

A handwritten signature in black ink, appearing to read "Nnamdi Madakor". The signature is stylized with a large initial "N" and a long horizontal stroke.

Nnamdi Madakor, P.G., P.HG.  
Senior Hydrogeologist  
Toxics Cleanup Program, Northwest Regional Office

NM:nm

cc: file