PHASE I

ENVIRONMENTAL SITE ASSESSMENT

Prepared for:

Everett Steel Companies

Prepared by:

ICF Kaiser Engineers

June 1992

ICF KAISER ENGINEERS

11808 Northup Way, Suite 104 • Bellevue, Washington 98005

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ICF Kaiser Engineers (ICF KE) has completed a preliminary environmental audit of the Everett Steel Companies (Site or Everett Steel) located at 3126 Hill Avenue, Everett, Washington. This report summarizes the approach to the project along with preliminary findings and conclusions.

The preliminary environmental audit consisted of the following task to complete this audit:

- Review of available information from state, federal, and local sources with respect to current and historical uses of the property and its surroundings.
- Review of the RCRA notifiers and U.S. Environmental Protection Agency (EPA) CERCLIS lists, and emergency response notification system (EPA).
- Review of state, federal, and local files concerning underground storage tanks (USTs) on the Site and surrounding area.
- Preparation of an oral and written report.

ICF KE does not discuss any aspect of the litigation brought by the United States government against the officers of Everett Steel for alleged legal disposal of hazardous waste, because the case is in progress.

1.0 EXECUTIVE SUMMARY

ICF KE has performed a Phase I Environmental Site Assessment of the Site. The President of the Everett Steel Companies (Everett Steel) is Mr. Manny Berman. Everett Steel is located at 3126 Hill Avenue, Everett, Washington. The Site is approximately two acres and consists of three warehouses, a warehouse under construction, a machine shop, scrap yard, Wheelabrator Building, open storage, and offices. Everett Steel is comprised of several subsidiaries which are Everett Steel & Pipe, Everett Wheelabrating & Priming, Everett Anchor & Chain, and Everett Surplus & Salvage. The primary activity at the Site is new steel sales and warehousing.

The property and adjacent properties were previously residential or undeveloped through the early 1900's, after which time the area became predominantly commercial through the 1950's. According to the Sanborn Insurance Atlas, Builders Supply Company was erected at the Site in 1911. Aerial photographs show that the Site was developed by 1969. Two creosote pole dipping operations are located south and southwest of Everett Steel. Before Everett Steel began operations, Burlington Northern had a pole dipping operation in the northern portion of the Site which Everett Steel now uses for open storage. The area surrounding the Site is a mixture of residential and commercial buildings.

The following summarizes ICF KE's findings regarding known compliance problems and potential environmental liabilities associated with the Site and adjacent properties.

- Everett Steel is in compliance with the air pollution regulations of the Puget Sound Air Pollution Control Agency.
- Everett Steel is on record with Department of Ecology (Ecology) as not having closed the former chain and anchor dip tank. Proper tank closure is in progress.

- Everett Steel is a small quantity generator of dangerous wastes. A recent inspection by Ecology demonstrated that Everett Steel is in complete compliance with the Dangerous Waste Regulations as a generator.

- There are several areas near the Wheelabrator Building and in the scrap yard where soils are stained with hydrocarbons. Everett Steel has sampled these areas, and is in the process of developing corrective measures.

- Burlington Northern, one of the property owners, conducted a pole dipping operation in the northern portion of the property before Everett Steel began operations. There was no documentation available to indicate any soil or groundwater contamination from this activity.

- Ecology has eight open cases concerning leaking USTs located within one mile of the Site. In several cases these tanks are located upgradient of the Site. Releases from these USTs are distant enough so that they are not expected to have impacted the Site.

- Building permit files searched at the City of Everett Records Division indicate that several adjacent properties currently have USTs present on site. Everett Fire Department records show emergency responses were generally associated with overspills of these tanks.

- One CERCLIS site, the City of Everett Landfill (EPA I.D. WAD980639405) is located within one mile of the Site. The landfill underwent a screening Site Inspection in June, 1988. No further action has been taken nor has a record of decision been issued.

2.0 INTRODUCTION

This report presents the findings of an environmental evaluation at the Site located at 3126 Hill Avenue, Everett, Washington.

2.1 STANDARD ASSESSMENT PROCEDURES

To accomplish this environmental assessment, ICF KE:

- Physically inspected the buildings and grounds.

- Visually surveyed the area immediately surrounding Everett Steel for evidence of environmental concerns.

- Interviewed personnel and reviewed documentation from selected city, county, regional, and state regulatory agencies.

- Reviewed Sanborn Insurance Atlas and aerial photographs to evaluate historical development of the Site and surrounding areas.

- Reviewed EPA CERCLIS and Ecology databases for potentially hazardous sites, to verify the status of Everett Steel, and to determine the proximity of listed sites to Everett Steel.

- Reviewed Ecology's UST database to identify registered USTs located in the vicinity of Everett Steel.

Disclaimer

ICF KE's assessment represents a review of certain information relating to the Site that was obtained by the methods described above and did not include sampling or other monitoring activities at the Site. While ICF KE has used reasonable care to avoid reliance upon data or information that is inaccurate, ICF KE was not able to verify the accuracy or completeness of all data and information available to ICF KE. Our engineering conclusions presented herein are based on the information available to use during our investigation, and some of those conclusions could be different if the information upon which they are based is determined to be false, inaccurate, or incomplete. ICF KE makes no legal representations whatsoever concerning any matter including, but not limited to, ownership of any property or the interpretation of any law. ICF KE further disclaims any obligations to update the report for events taking place after the time during which we conducted our assessment.

ICF KE's environmental property evaluation addressed the past and present operations at the Site with respect to the following environmental areas and their associated regulation: air pollution control; water supply and pollution control; hazardous waste management; solid waste management; USTs; materials, products and pesticide storage; PCB inventory management; and past on-site and off-site disposal practices. ICF KE does not address the litigation brought by the United States government against the officers of Everett Steel for allegedly illegal disposal of hazardous wastes off site because the case was in progress at the time this report was written.

3.0 SITE ASSESSMENT

The site assessment inspection of the property was performed by Robert Taaffe of ICF KE. ICF KE limited the site inspection tour to the Everett Steel Facility. ICF KE also included in this assessment adjacent properties and business practices which may impact the Site.

3.1 SITE DESCRIPTION

Everett Steel is located at 3126 Hill Avenue, Everett, Washington (Figure 1). The companies of Everett Steel are Everett Steel & Pipe, Everett Wheelabrating & Priming, Everett Anchor & Chain, and Everett Surplus & Salvage. The property is located in an industrial area to the east of the Burlington Northern Railroad tracks and is bordered by Hill Avenue as shown on Figure 2. Figures 3 and 4 show the site plans for the Wheelabrator Building and the Warehouse Area.

The primary activity at the subject site is new steel sales and warehousing. Paints, reusable solvents, and petroleum products are stored in three locations in the Warehouse Area (Locations 1 through 3) and one location adjacent to the Wheelabrator Building (Location 4):

FIGURE 1. GENERAL SITE AREA

FIGURE 2. SITE LOCATION MAP

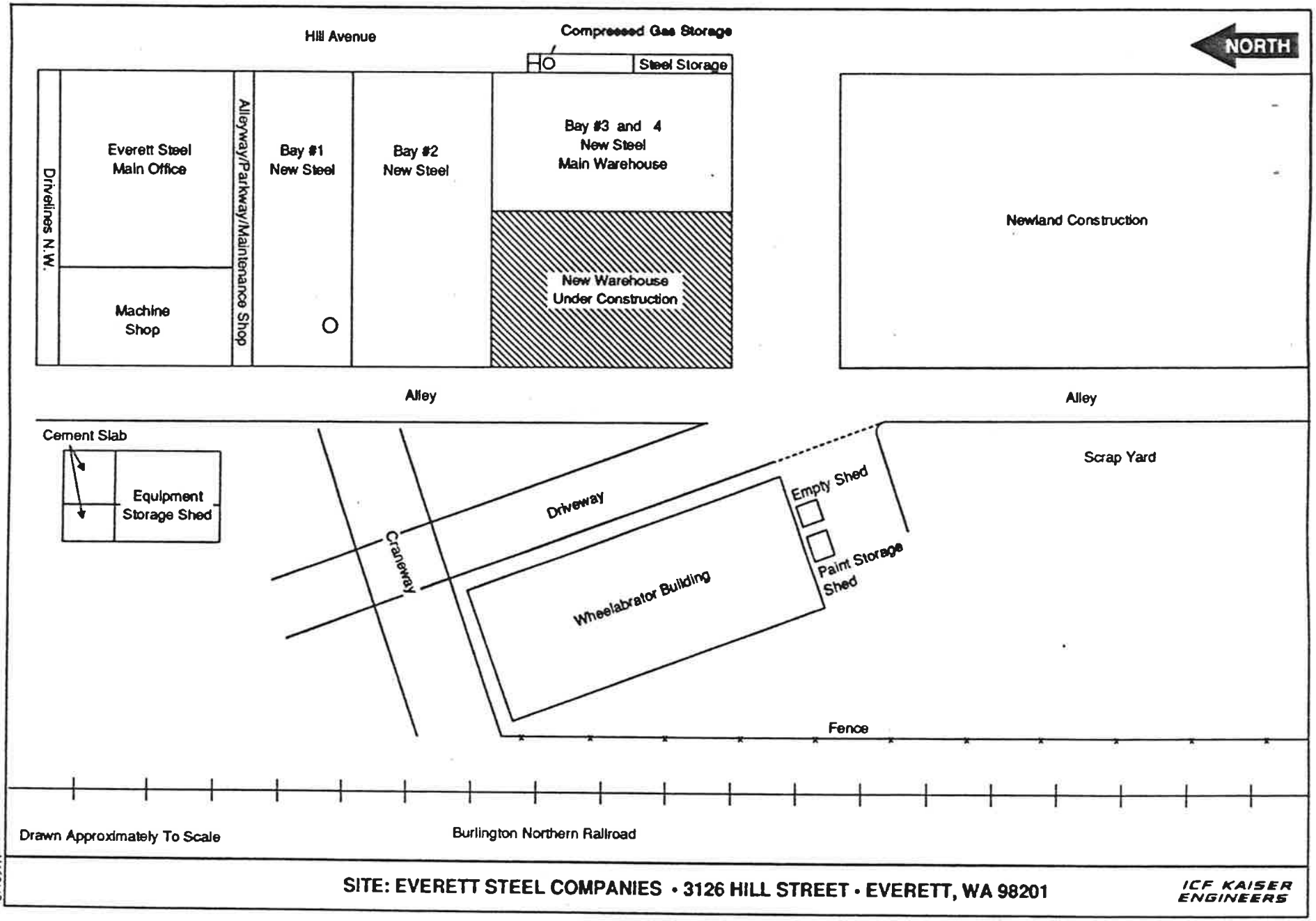
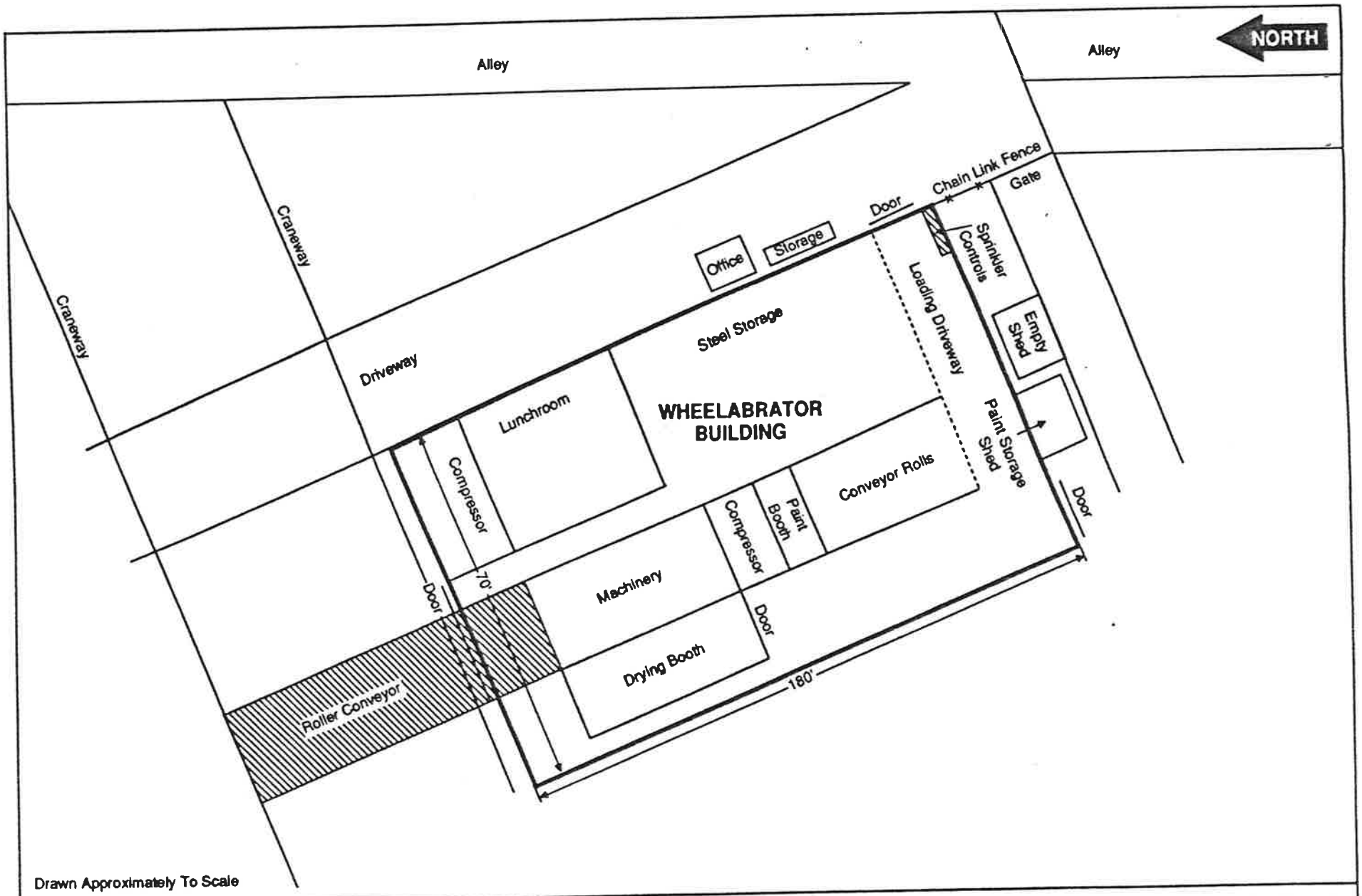


FIGURE 3. SITE PLAN OF WHEELABRATOR BUILDING



SITE: EVERETT STEEL COMPANIES • 3126 HILL STREET • EVERETT, WA 98201

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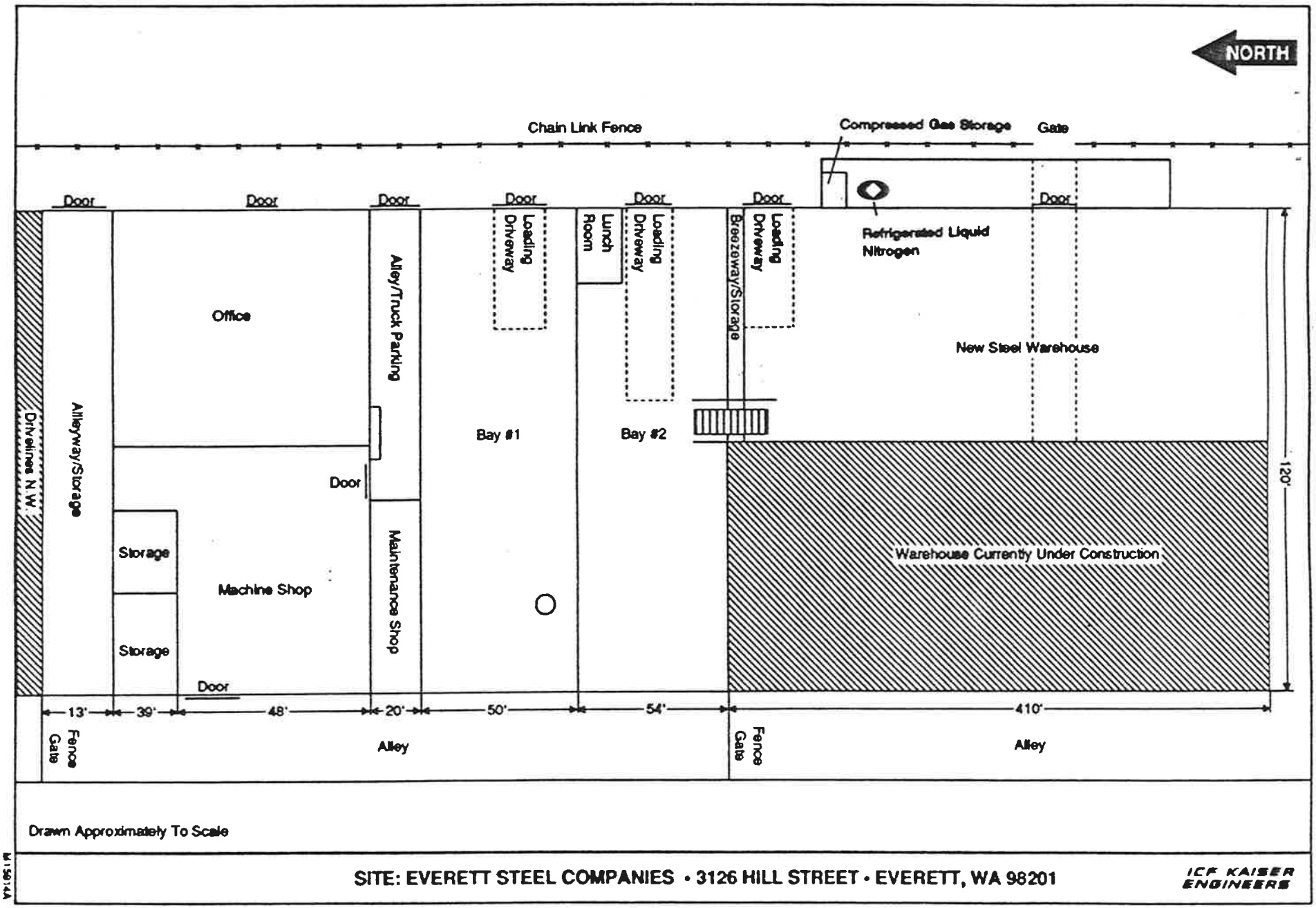
FIGURE 4. SITE PLAN OF WAREHOUSE AREA



Location 1.	Maintenance and Alleyway Parking Area (between the new steel bays and the main office);
Location 2.	Maintenance and Machine Shop Area (between the new steel bays and the machine shop);
Location 3.	Bay #1 Chain Dipping Vat; and
Location 4.	Storage sheds adjacent to the Wheelabrator Building.

In addition, less than 55 gallons of spent paint thinner are stored in a satellite accumulation area in the Wheelabrator Building, and are managed in accordance with Washington Dangerous Waste regulations (WAC 173-303). The Wheelabrator is a patented device that strips oxide coatings from steel by spraying the surfaces with steel shot propelled at high speed. The stripped steel is then primed with zinc phosphate-based paint. This process generates small quantities of regulated dangerous waste. Currently, the only waste is ignitable spent thinner (D001). Previously, small quantities (<1,000 kg/month) of solids containing chromium from dried paint waste were accumulated as well from wasted zinc chromate paints. These residues have been disposed under manifest by Safety-Kleen, Inc. Safety-Kleen disposes of all drummed waste every eight weeks. The wastes are either buried for energy recovery in Texas, or incinerated in New Jersey.

Paints, reusable solvents, some compressed gases (Figure 4), and petroleum products are stored in the Maintenance and Alleyway Parking Area (Figure 3). Other materials are stored in the alleyway near the maintenance shop. Compressed gas cylinders are primarily stored in the maintenance and machine shop area.

A scrap yard area is operated adjacent to the Wheelabrator Building production operations.

3.2 LISTED ADJACENT SITES

The City of Everett Landfill is located approximately 1.1 miles southwest of the Site. The landfill is currently listed on the EPA Region 10 CERCLIS list as a potential hazardous waste site. The landfill is undergoing continuing assessment. Approximately 18 other sites located within one mile of Everett Steel are listed on the Facility Index System. This system is a compilation of businesses which the EPA has investigated, reviewed, or otherwise identified as a hazardous waste facility. According to the documentation available, there are no industrial discharges from the sites to any surface water bodies, and there appears to be no impact to the Site.

3.3 PREVIOUS LAND USE

The Everett Steel facility was erected as the Pan Alaskan Steel Company in 1966. The Site was previously used as a storage area by the Riverside Junk Company beginning around 1953. Aerial Photographs, City of Everett Building Permits, and historic Sanborn Insurance Atlas Maps were reviewed to aid in the reconstruction of site history.

Sanborn Insurance maps reviewed at the University of Washington Library provided detailed land use information for the years 1893, 1902, 1914, and 1939. The Site was undeveloped and no businesses were located in the general area in 1893. Although the area was undeveloped with no businesses along Hill Avenue in 1902, the railroad has a right of way and tracks just west of the present day Everett Steel. In 1902, water lines had been installed and the Eclipse Saw Mill was present at 33rd and Walnut Streets. According to the City of Everett Building Department

(Permits), a Builders Supply Company warehouse was erected at 3126 Hill Avenue in 1911. The 1914 Sanborn map shows the following:

- the Builders Supply Company along with six houses;
- a lumber shed at Hill Avenue and 32nd Street;
- a Standard Oil storage facility between 3102 and 3108 Hill Avenue;
- Washington Stove Works and Everett Brewing facilities on adjacent corners of 34th Street and Smith Avenue; and
- general development warehouses and homes.

By 1939, several commercial enterprises had been established on Hill Avenue. A junkyard was located at 3210 Hill Avenue; Contractor's General Steel had a warehouse at 3231 Hill Avenue; and a home was erected at 3217 Hill Avenue. Bleaching Liquid Manufacturer was located at Hill Avenue and 32nd Street. Standard Oil still had a facility present along with Texas Oil Company at 32nd Street and McDougal. In addition, the City of Everett Street Department was located on the adjacent corner.

In 1951, the area was blacktopped and commercial development began. Building permits from 1953 show Riverside Junkyard erected a storage shed and installed weigh scales. Simpson Paper Company was present along Hill Avenue in 1956. Pan Alaskan which later became Everett Steel constructed a building at 3126 Hill Avenue in 1966.

Aerial photographs reviewed from the University of Washington Maps Collection showed Everett Steel present in 1969. At that time, the area was generally residential with a rail yard, scrap yard and log storage adjacent to the Site. Further detail was difficult due to the scale of the photograph.

3.4 ENVIRONMENTAL SETTING

The Site is located within the Snohomish River Valley Basin. The Site elevation is approximately 50 feet above mean sea level, according to the Everett, Washington quadrangle of the USGS topographic series map. The Snohomish River is located approximately two miles of the Site and flows to the south.

No water wells are located on the Site. One shallow monitoring well was constructed as part of the anchor and chain dip tank closure. During inspection of surrounding properties, no water wells were observed.

No site-specific hydrogeologic studies have been conducted. Soil boring logs taken on site in March 1992 as part of the investigation of the tip tank area recorded gravel fill from the surface to one foot deep. A medium to coarse sand lies from 1 to 3 feet underlain by clay fill from 3 to 10 feet deep. ICF KE observed a few inches of perched ground water on top of the clay. Information provided by the USGS shows the area of Everett Steel is composed of advance glacial outwash deposits. The oldest Quaternary sediments in the quadrangle are diverse glacial, fluvial, lake, and marsh deposits which underlie deposits of the most recent glaciation (Fraser Glaciation). Overlying, predominantly glacial sediments were deposited from the Puget lobe of the Cordilleran continental ice sheet, which advanced from, and retreated to, British Columbia between about 20,000 and 13,000 years ago.

3.5 UTILITIES

Utilities servicing the Site include public water supply and sewer (City of Everett), electric (Snohomish Public Utility District No. 1), and telephone. Solid waste is picked up by a contract waste disposal service.

According to facility personnel, all water supplied to the Site is from the City of Everett and the source of the water is Spada Reservoir located 25 miles east of Everett. The City operates two pumping stations located in South Everett, which are more than two miles from the Site.

3.6 ADJACENT PROPERTIES AND USAGE

The Site is bordered by commercial areas in all directions, interspersed with residential homes. North of Everett Steel are commercial structures, including a Chevron Fueling Station at Hill and Pacific (Figure 5). Further North of Everett Steel are residential and retail areas. Commercial warehouses, homes, and hotels are located east of the Site. West of the Site are numerous commercial warehouses and industrial manufacturing facilities. During a survey of the area a number of facilities were observed which could be of concern to the Site. Within one mile of the Site, 8 properties are listed as containing leaking USTs, 18 facilities are listed as RCRA facilities, and 5 of the adjacent sites have had emergency response associated with hazardous material spills or mishandlings.

4.0 INITIAL ENVIRONMENTAL ASSESSMENT

The potential areas of environmental liability at the Site are summarized in the following sections.

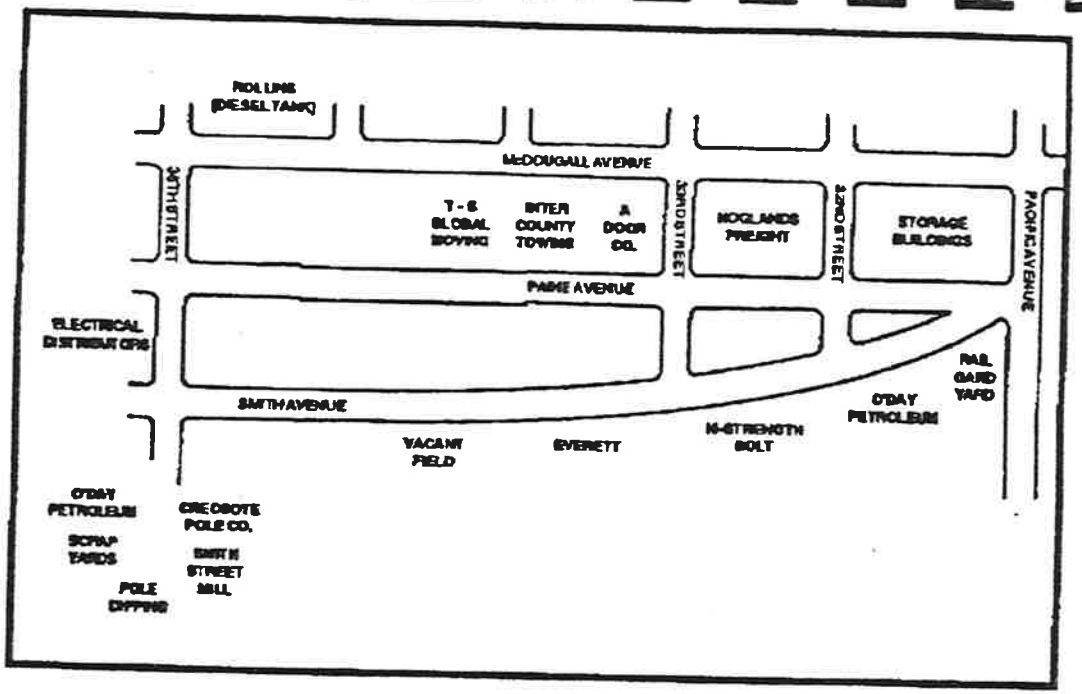
4.1 AIR POLLUTION

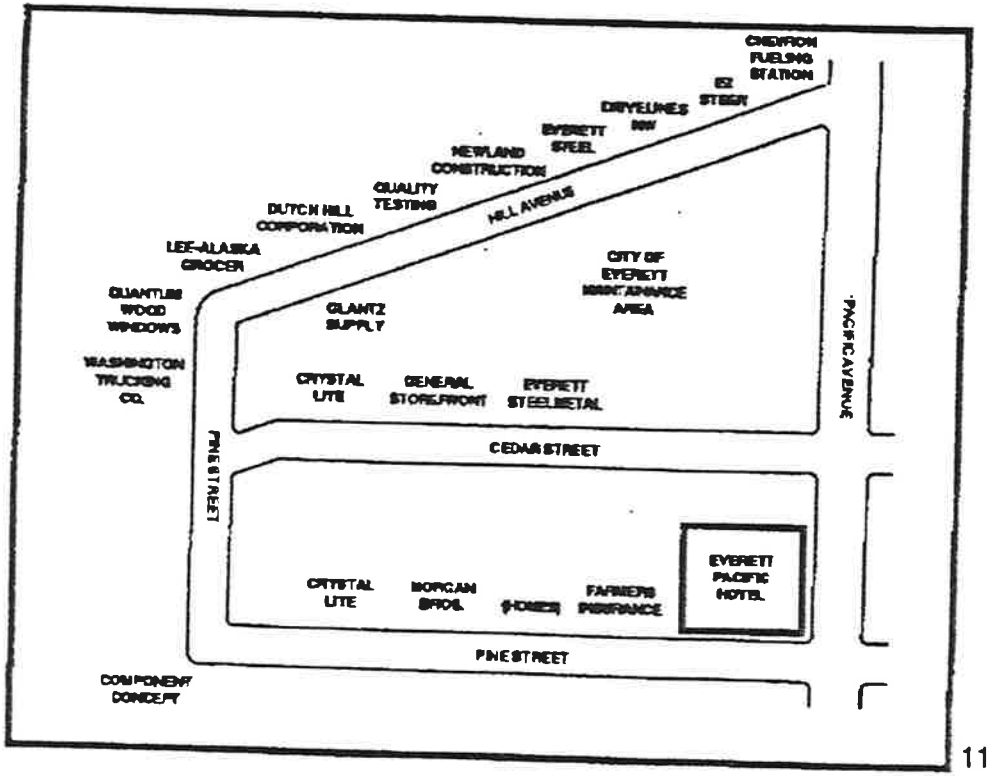
Everett Steel operates air contaminant generating equipment and air contaminant control equipment which is inspected and permitted by the Puget Sound Air Pollution Control Agency (PSAPCA). Specifically, Everett Steel operates a wheelabrator abrasive blast room, baghouse dust collector, and a paint booth with a filter system. No visible air emissions or evidence of air pollution from the building were observed. No complaints regarding odor or other air pollution nuisance conditions have been reported to the City of Everett Health Department.

Mr. Berman of Everett Steel indicated that the building is equipped with baseboard heating and window air conditioning units that are maintained by an outside contractor. The building management indicated that an asbestos survey has not been conducted for the Site, but management indicated that no areas on site contain asbestos.

4.2 WATER SUPPLY AND POLLUTION CONTROL

All water to Everett Steel is supplied by the City of Everett through a municipal distribution system. Sanitary wastes are discharged to the City of Everett sanitary sewer and sewage treatment plant. Only sanitary wastewater is generated at the Site.





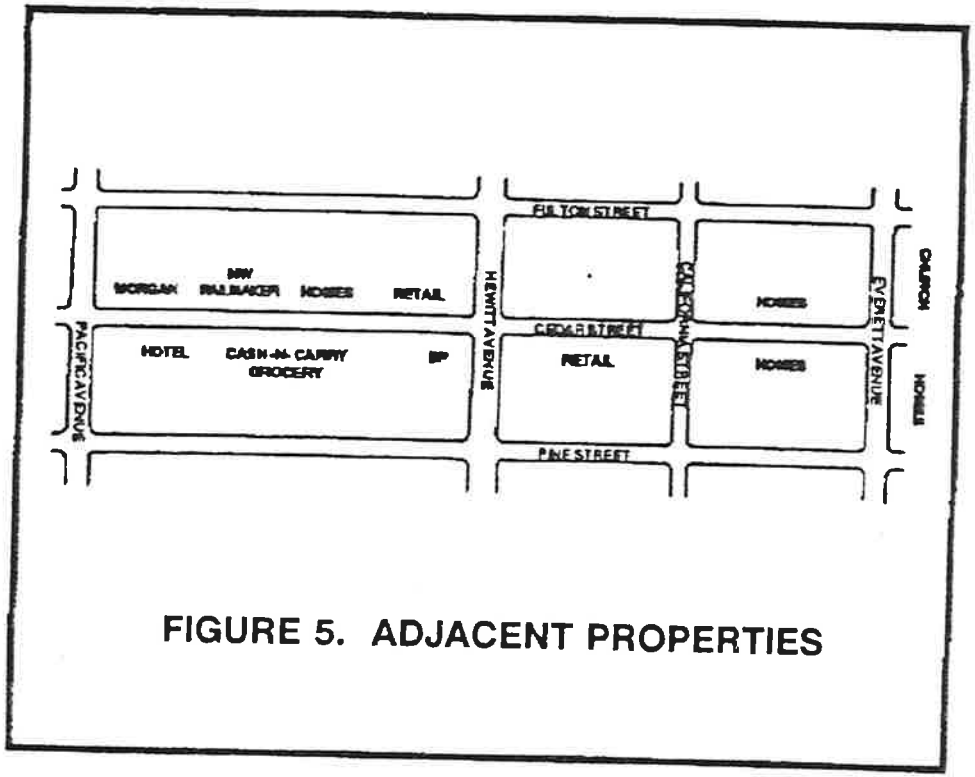


FIGURE 5. ADJACENT PROPERTIES

4.3 MATERIALS, PRODUCTS, AND PESTICIDE STORAGE

Everett Steel manages its hazardous materials in accordance with an approved Hazardous Materials Management Plan, which is on file at the Everett Fire Department. The primary materials stored on site, paints, reusable solvents, and petroleum products, are stored in three locations in the Warehouse Area (Locations 1 through 3) and one location adjacent to the Wheelabrator Building (Location 4):

Location 1.	Maintenance and Alleyway Parking Area (between the new steel bays and the main office);
Location 2.	Maintenance and Machine Shop Area (between the new steel bays and the machine shop);
Location 3.	Bay No. 1 Chain Dipping Vat; and
Location 4.	Storage shed adjacent to the Wheelabrator Building.

4.3.1 Warehouse Area

4.3.1.1 Maintenance and Alleyway Parking Area. Paints, reusable solvents, some compressed gases (Figure 3), and petroleum products are stored in the Maintenance and Alleyway Parking Area (Figure 2). Other materials are stored in the alleyway by the maintenance shop in the following amounts:

- 45 gallons of No. 325 solvent;
- 15 gallons of methanol UN 1230 (antifreeze for saws);
- 20 gallons of kerosene (for heaters in shop);
- 20 gallons of HD grease 1;
- 10 gallons of valvata J gear oil (for shear gear lube);
- 10 gallons of Rotella 10 weight oil (transmission oil in crane);
- 5 gallons of compressor oil;
- 30 gallons 40 weight engine oil; and
- 25 gallons hydraulic oil (tellus oil).

4.3.2 Maintenance and Machine Shop Area

Compressed gas cylinders are primarily stored in the maintenance and machine shop area in the following amounts:

- Refrigerated liquid oxygen - bulk storage tank - 1,550 gallons/167,862 CF;
- Liquid oxygen in small bottles - 9,000 CF;
- Free gas oxygen in small bottles - 6,777 CF;
- Propane in small bottles - 800 lbs/6,904 CF;
- Acetylene in small bottles - 750 CF;
- Mapp gas in small and medium bottles - 1,545 lbs.; and
- Nitrogen in small bottles - 3,060 CF.

* Note: These are maximum amounts. Quantities vary but never exceed these figures.

4.3.3 Bay 1 Chain Dipping Vat

Two hundred gallons of anchor chain black are stored in a vat located in Bay No. 1, which is adjacent to the alleyway and the Maintenance Shop. Everett Steel does minor chain dipping to inhibit oxidation.

4.4 WHEELABRATOR BUILDING

Everett Steel, through a subsidiary, primes steel for various purposes using a patented process. The wheelabrator strips oxide coatings from the steel by spraying the surfaces with steel shot propelled at high speed. The stripped steel is then painted with primer paint. This process generates small quantities of waste, specifically spent paint thinner, dried paint chips and general debris, and spent steel shot. New paint and paint thinner are stored in sheds outside the Wheelabrator Building.

4.4.1 Wheelabrator Building Area Storage Sheds

Primers, paints, and thinner are stored in the Wheelabrator Building area in storage sheds. Primers and paints kept in stock total approximately 500 gallons. The maximum amount of thinner kept in stock is 550 gallons (ten 55-gallon drums).

Pest control for the Site is provided on a contract basis. Pest control chemicals are not stored on site by the pest control contractor. The landscaping for the Site is also provided on a contract basis. No landscaping tools or products are stored on site by the landscaping contractor.

4.5 HAZARDOUS WASTE MANAGEMENT

4.5.1 Wheelabrator Building Waste Generation

Everett Steel uses a patented device, called a Wheelabrator, to strip oxide coatings from steel plates, pipes, rods, etc. by spraying the surfaces with steel shot propelled at high speed. The stripped steel is then primed with zinc phosphate-based paint.[1] The process generates some solid wastes, spent steel shot, dried waste paint chips, and floor sweepings; and a small quantity of dangerous waste (WAC 173-303) in the form of ignitable spent paint thinner. Everett Steel currently qualifies as a conditionally exempt small quantity generator because it produces less than 100 kg of dangerous waste each month. The spent thinner is kept in a new 55-gallon drum in a satellite accumulation area within the Wheelabrator Building. If a drum fills up before a Safety-Kleen pick up, Everett Steel follows its written protocol and seals the drum, moves it to an adjacent storage shed (which is secondarily contained), and marks the accumulation start

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[1] Everett Steel has made a number of adjustments to its processes to reduce waste generation. Everett Steel has historically used zinc-based paint over lead-based paint, and has recently switched to a zinc phosphate pigment from a zinc chromate paint. As a result, chromium wastes have been eliminated and the only dangerous waste generated is spent thinner. Further reduction has been realized by separating non-hazardous solids, paint chips, and floor sweepings from the hazardous, or dangerous spent thinner. Safety-Kleen, Inc. has been contracted to transport and dispose of the dangerous waste and the non-hazardous wastes every eight weeks in accordance with federal and state regulations. The waste is burned for energy recovery or incinerated out-of-state.

date. The written protocol for handling the drums complies fully with Ecology's Dangerous Waste Regulations. Everett Steel was inspected by Ecology in May 1992, and found to be in complete compliance with the regulations for generators. Everett Steel has a generator identification number, WAD980639405.

4.6 SOLID WASTE MANAGEMENT

The solid waste generated at the Site is placed in a dumpster located outside the building. Wastes generated at the Site include waste paper and miscellaneous trash. The solid waste is collected daily and disposed at the City of Everett municipal landfill.

4.7 UNDERGROUND STORAGE TANKS

An in ground 10,000-gallon UST used to dip anchors and chains was removed and sold in 1991. The tank did not leak, and, to Everett Steel's knowledge, is still in use. Everett Steel is currently removing shallow contaminated soils evaluating the perched groundwater, and completing the confirmatory sampling required to formally close the UST with Ecology. The contamination resulted from occasional dripping from dipped chains and anchors, or sloshing of the open tank when it was in use (the tank was covered when not in use). A second UST used to store fuel was removed in 1988. The latter tank has been certified as permanently out and closed by Ecology's UST Division.

Approximately 20 UST facilities exist within one mile of the Site. The majority of these tanks contain fuel or used oil.

LUST file listings compiled by Ecology, UST Division contain eight open cases involving leaking USTs located within one mile of the Site. The following summary provides the name of the tank owner, the facility address and the approximate distance of the facility from the Site:

- Anderson Bulk, 2805 Broadway - 0.8 mile to the northwest.
- Car wash - Everett, 3523 Broadway - 0.8 mile to the southwest.
- Everett Public Works Service Center, 3200 Cedar Street - 0.01 mile to the east.
- Hoagland Transfer, 3128 Paine Street - 0.5 mile to the west.
- UNOCAL Station, Station No. 3728, 3702 Broadway - 1 mile to the southwest.
- Clarke Distributing, 2202 36th Street - 0.8 mile to the southwest.
- Chevron Station, Station No. 9-6365, 3105 Broadway - 0.5 mile to the west.
- Time Oil Food Mart, No. 178, 3532 Smith Avenue - 0.25 mile to the southwest.

Several of these contaminated sites appear to be located upgradient or crossgradient of the Site, yet they are distant enough so that they are probably of no concern. The Everett Public Works Service Center is the closest, and it is down gradient, therefore it is probably of no concern.

4.8 PCB INVENTORY

The local electric company, Snohomish Public Utility District, maintains the two transformers located at the Site. The transformers were installed new in 1988 and are located on the outside of the building. The transformers were inspected and were found to be pad-mounted, oil-cooled transformers. Neither had any labels indicating PCBs, and, due to the recent installation, they are not expected to contain PCBs.

4.9 SCRAP YARD

Everett Steel observed stained soil in the scrap yard during a recent site walk, and took ten samples from five locations in the scrap yard and around the adjacent Wheelabrator Building. Concentrations of metals, chromium, mercury, and lead in three samples exceed Model Toxics Control Act (MTCA) industrial cleanup standards. Concentrations of total petroleum hydrocarbons (TPHs) in five samples exceed MTCA cleanup standards for industrial soil. The samples that exceed the MTCA standards are all shallow (no deeper than six inches) None of the deeper samples (1.5 to 2 feet deep) exceed the MTCA industrial cleanup standards for TPH or metals.

A report of this investigation is in preparation. All proper notifications are being made.

4.10 HEALTH AND SAFETY

The responsibility for maintaining a safe working environment at the Site lies with Mr. Leon Berman, Vice President of Everett Steel. In addition, Mr. Berman maintains the building to provide a safe working environment for the employees.

SARA Title III reporting has not been conducted for this building. The Site is exempt from reporting requirements due to the limited amount of materials stored at the Site.

Everett Steel manages hazardous materials according to an approved Hazardous Materials Management Plan (HMMP) which is required of all Everett businesses by the Everett Fire Department. This Plan is on file at Everett Steel and at the Everett Fire Department. Material Safety Data Sheets (MSDSs) for the various material used on site are located on site.

4.11 OFF SITE CONCERNS

The Site is located in an industrial area with individual homes interspersed. Various industrial activities occur within one mile of the Site which include a vehicle maintenance and bus storage area for the City of Everett, a recycling facility, steel fabrication, trucking facilities, a foundry, manufacturing and construction activities, and metal fabrication. Two creosote pole dipping operations are located south and southwest of the Site. A review of EPA and state files indicated that 23 facilities within one mile of the Site are currently listed as RCRA generators or facilities being monitored concerning environmental compliance issues. Everett Iron and Metal (EPA I.D. WAD988483764), 2732 36th Street, is listed for monitoring under the Toxic Substance and Pesticide Program.

While conducting this audit, ICF KE reviewed the Emergency Response Notification System (ERNS), a database which tracks materials spills, leaks, and mishandling of hazardous materials. The ERNS indicated that five facilities in the area had an emergency response concerning hazardous materials within the last four years. The most recent was a spill of unleaded gasoline at Nelson Distributing Company located at 3102 Hill Avenue on March 18, 1992. Nelson Distributing Company is in the process of cleaning up contaminated soils on its property. There is no evidence that this spill has impacted Everett Steel. At the time this report was written, EPA had failed to provide details on the other emergency responses. This information will be sent when it is received. It is known that there were two train derailments on the western border of the Everett Steel property. Details will be provided by EPA.

The City of Everett Landfill located one mile southeast of the Site is listed on EPA's CERCLIS list. The assessment of the landfill is ongoing and no determination of further action has been established.

With the presence of the numerous industrial facilities and the quantity of RCRA waste generators within one mile of the Site, Everett Steel should continue to monitor neighboring facilities to ensure that past or future activities will have minimal potential environmental impact on the Site.

5.0 CONCLUSIONS AND RECOMMENDATIONS

ICF KE offers the following conclusions and recommendations:

Conclusions

- Everett Steel is in compliance with the air pollution regulations of the Puget Sound Air Pollution Control Agency.
- Everett Steel is on record with Ecology as having an operational chain and anchor dip tank. The tank has been removed and proper documentation is in progress.
- Everett Steel is a small quantity generator of dangerous wastes. A recent inspection by Ecology demonstrated that Everett Steel is in complete compliance with the Dangerous Waste Regulations as a generator.
- There are several areas near the Wheelabrator Building and in the scrap yard where soils are stained with hydrocarbons. Everett Steel has sampled these areas, and is deciding on a course of action.
- Burlington Northern, one of the property owners, conducted a pole dipping operation in the northern portion of the property before Everett Steel began operations. It is presently unknown whether there is contamination from this activity.
- Ecology has eight open cases concerning leaking USTs located within one mile of the Site. In several cases these tanks are located upgradient of the Site. Releases from these USTs are distant enough so that they are not expected to have impacted the Site.
- Building permit files searched at the City of Everett Records Division indicate the Site and several adjacent properties currently have USTs present on site. Everett Fire Department records show emergency responses were generally associated with overspills of these tanks.
- One CERCLIS site, the City of Everett Landfill (EPA I.D. WAD980639405) is located within one mile of the Site. The landfill underwent a screening Site Inspection in June, 1988. No further action has been taken nor has a record of decision been issued.

Recommendations

- Complete formal closure of the UST used for dipping anchors and chains.
- Extend the investigation of shallow soil contamination, and remove soil contaminated above regulatory limits. Comply with reporting requirements.
- Continue management of drums in the present manner.
- Investigate the site of the former Burlington Northern pole dipping operation.
- Monitor neighboring emergency responses and remedial actions.