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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-9462 • (206) 634-4000

June 7, 2004

Mr. Mathew Miller
Delta Environmental Consultants, Inc.
1200 112th Avenue NE, Suite C-210
Bellevue, WA 98004

Dear Mr. Miller:

Re: ARCO Facility No. 5581, 830 Moore Street, Sedro Wooley, WA 98284

Thank you for submitting the results of your independent remedial action for review by the Washington State Department of Ecology (Ecology). 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 ARCO Facility No. 5581 facility:

1. Report titled "Ground Water Monitoring Report Atlantic Richfield Company First and Second Quarters of 2002" prepared by Delta Environmental Consultants, Inc., dated November 19, 2002.
2. Report titled "Ground Water Monitoring Report Atlantic Richfield Company Third and Fourth Quarters of 2002" prepared by Delta Environmental Consultants, Inc., dated January 31, 2002.
3. Report titled "Ground Water Monitoring Report Atlantic Richfield Company First and Second Quarters of 2001" prepared by Delta Environmental Consultants, Inc., dated August 22, 2001.
4. Report titled "Ground Water Monitoring Report Atlantic Richfield Company Fourth Quarter of 2002" prepared by Delta Environmental Consultants, Inc., dated February 15, 2001.
5. Report titled "Ground Water Monitoring Report Atlantic Richfield Company Third Quarter of 2000" prepared by Delta Environmental Consultants, Inc., dated October 24, 2000.
6. Report titled "ARCO Ground Water Monitoring Report First and Second Quarters of 2000" prepared by Delta Environmental Consultants, Inc., dated October 5, 2000.
7. Report titled "ARCO Quarterly Groundwater Monitoring Report Third Quarter 1999" prepared by IT Corporation, dated March 13, 2000.

Mr. Mathew Miller

June 7, 2004

Page 2 of 3

8. Report titled "ARCO Quarterly Groundwater Monitoring Report Fourth Quarter 1999" prepared by IT Corporation, dated March 13, 2000.
9. Report titled "ARCO Quarterly Groundwater Monitoring Report Second Quarter 1999" prepared by Pinnacle Environmental Solutions, dated September 15, 1999.
10. Report titled "ARCO Quarterly Groundwater Monitoring Report First Quarter 1999" prepared by Pinnacle Environmental Solutions, dated April 14, 1999.
11. Report titled "ARCO Quarterly Groundwater Monitoring Report Fourth Quarter 1998" prepared by Pinnacle Environmental Solutions, dated February 26, 1999.
12. Report titled "Environmental Investigation ARCO Service Station 5581 830 Moore Street Sedro Woolley, Washington, prepared by Pacific Environmental Group, Inc., dated March 13, 1998.
13. Department of Ecology – Northwest Regional Office Underground Storage Tank Notice of Confirmed Release (UST # 99027, ERTS # N29426 by Steve Bremer, dated 5-15-98.

The report(s) listed above will be kept in the Central Records of the Northwest Regional Office (NWRO) of Ecology. The documents are available for review by appointment only. Appointments can be made by calling Sally Perkins at (425) 649-7190.

Based upon the information in the reports listed above, Ecology has identified a number of concerns that must be addressed prior to issuance of a "no further action" determination. The following is a summary of Ecology's concerns:

1. Groundwater monitoring wells surround the underground storage tank nest, but no wells are located further away to delineate the maximum extent of the dissolved hydrocarbon plume. Although the direction of groundwater flow is apparently to the south, there are no wells south of MW-3. It is possible that the dissolved plume has migrated off site to the south and the decreased concentrations detected in MW-3 indicate that the plume has passed this well in its southward migration.
2. The underground storage tanks have been left in place. What is the nature of contamination of soils immediately adjacent to, and below, these tanks? Where did the release of gasoline occur? How deep are the tanks to the seasonal, local groundwater table? What is the present status of these tanks and closure?
3. The soil near piping connections may be contaminated by releases from defective equipment documented in a Department of Ecology Underground Storage Tank Notice of Confirmed Release dated 12/6/97. Along with characterization and assessment of soil contamination by petroleum hydrocarbons in the tank and piping area, provide to the Department of Ecology

Mr. Mathew Miller
June 7, 2004
Page 3 of 3

related information on possible contamination from other related facilities on this property.

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.

Ecology will update its database to reflect this "Further Action" determination. Your site will continue to appear in future publications of the Confirmed & Suspected Contaminated Sites Report.

Ecology will update its Leaking Underground Storage Tank database to reflect this "Further Action" determination. Your site will continue to appear in future publications of the LUST database.

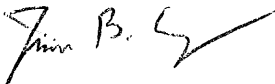
The opinions presented by Ecology in this letter are made only with respect to the information provided in the reports and documents listed above. This opinion is only applicable to the specified site (or area of site) and may not be used to justify action at another site (or area of the site.)

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.

If you have any questions regarding this letter, please contact me at (425)649-7094.

Sincerely,



Jerome Cruz
Toxics Cleanup Program

JC:SA
Enclosures