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August 21, 2024

Washington State Department of Ecology  
Toxics Cleanup Program, Southwest Regional Office  
P.O. Box 47775  
Olympia, Washington 98504-7775

Attention: VCP Coordinator

Subject: VCP Application Cover Letter and Request for Opinion on Completed Cleanup  
Lakeview Auto Wrecking Property  
Ecology Cleanup Site ID: 3341  
Former VCP ID: SW0742  
Former address: 11528 Pacific Highway SW  
Lakewood, Washington 98499  
Portion of Pierce County Parcels 0219122166 and 0219114216

## Introduction and Background

On behalf of the Central Puget Sound Regional Transit Authority (Sound Transit), GeoEngineers, Inc. (GeoEngineers) is submitting the attached Voluntary Cleanup Program (VCP) application for the Lakeview Auto Wrecking Property, 11528 Pacific Highway SW, Lakewood, Washington (Site). The Site comprises portions of two Pierce County tax parcels: 0219122166 and 0219114216. Attachments A and B include copies of the VCP Eligibility Form, Application and Agreement. Sound Transit is requesting that the Washington State Department of Ecology (Ecology) review the information submitted and provide an opinion and No Further Action (NFA) determination for the completed cleanup.

Sound Transit purchased the property in approximately 2006 as part of the Sound Transit Lakewood Station transit center development. The Sound Transit Environmental Compliance Department contact is as follows:

- Name: Ross Stainsby, Sr. Environmental Planner, Sound Transit
- Mailing address: 401 S Jackson Street, Seattle, WA 98104-2826
- Email address: ross.stainsby@soundtransit.org
- Phone number: 206.553.3607

This letter presents a summary of the Site remedial investigations and Model Toxics Control Act (MTCA) independent cleanup actions completed and is intended to facilitate Ecology's review of the previous site assessment and cleanup reports that document the work performed.

## Property and Site Description

The address associated with the former property occupant, Lakeview Auto Wrecking, is 11528 Pacific Highway SW, Lakewood, Washington. The Site was redeveloped by Sound Transit and is situated within a portion of Sound Transit's Lakewood Station as shown in the image below.



Source: GoogleEarth image dated August 25, 2022.

The Site is bordered to the northwest by Sound Transit's commuter rail right of way, to the southeast by Pacific Highway SW, and to the southwest and northeast by other areas of Sound Transit's Lakewood Station.

## Regulatory History

Site investigations performed in 2003 and 2006, prior to construction of the Lakewood Station, identified hazardous substances in soil at concentrations greater than MTCA Method A cleanup levels. Surface and near-surface soil with diesel, oil, arsenic and lead was identified in the northeastern portion of the property. Groundwater sampled from three borings did not identify contaminants of concern at concentrations greater than MTCA Method A cleanup levels.

The Lakeview Auto Wrecking Property was enrolled in Ecology's VCP in January 2006 (Facility Site ID:8427706, Cleanup Site ID:3341). The 2006 submittal proposed using MTCA cleanup levels for industrial sites; Ecology determined that the Site did not meet MTCA criteria for an industrial site. and Ecology issued a Further Action Determination for the Site in March 2006. Ecology removed the property from the VCP in August 2007 due to inactivity.

## Cleanup Actions

During 2006 and 2007 Sound Transit conducted additional investigation and cleanup actions concurrently with construction of the Lakewood Station. Sound Transit's contractor and their environmental consultant observed remedial excavation of shallow contaminated soil and collected multiple characterization and confirmation soil samples. Approximately 1,413 tons of contaminated soil were removed during the 2007 remedial excavation activities at the Site. An additional 154 tons of State Dangerous Waste based on toxicity characteristic leaching procedure (TCLP) lead testing of samples was transported off-site for permitted disposal. Thirteen (13) confirmation soil samples were analyzed from the excavation limits. Two confirmation soil samples with concentrations of 270 and 290 milligrams per kilogram (mg/kg) lead (LA-15 and LA-14, respectively) were left in place at depths of 1 to 1.5 feet below ground surface (bgs) at the west and south margins of the excavation. A duplicate sample of LA-14 had a concentration of 51 mg/kg lead.

The remedial excavation and soil sampling activities are described in Shannon & Wilson, Inc.'s Remedial Action Report for the Sound Transit Lakewood Station dated September 19, 2008. A copy of this report is being submitted with this letter (see Attachment C). A statistical evaluation of cleanup confirmation soil samples collected across the full Lakewood Station was completed in accordance with MTCA guidance as explained in the 2008 report. The evaluation documents that soil conditions at the Site comply with MTCA Method A cleanup levels for unrestricted land use. There have been no additional investigations or remedial actions conducted at the Site.

During the 2007 remedial activities, one 300-gallon "oil" underground storage tank (UST) was decommissioned. Three tank cavity soil samples were analyzed for petroleum hydrocarbons. Lube oil-range hydrocarbons were detected at concentrations less than the MTCA Method A cleanup level in all three samples. The UST decommissioning report was submitted to Tacoma Pierce County Health Department and a no further action letter was issued. A copy of the UST removal report is being submitted with this letter (see Attachment D).

The lead contaminated in soil not volatile and there are no enclosed structures at the property; therefore, soil vapor intrusion is not a concern for the Site.

A Terrestrial Ecological Evaluation (TEE) form is submitted as Attachment E. The Site qualifies for an exclusion from further TEE.

## Conclusions

Contaminants of concern were not identified in the 2003 groundwater samples from the Site at concentrations exceeding MTCA Method A cleanup levels. Soil across the site was extensively characterized in 2003 and 2007 and remediated in accordance with MTCA requirements. The 2007 remedial excavation activities addressed widespread surface and near-surface soil contamination. After remedial excavation, two confirmation soil samples with lead concentrations exceeding the MTCA Method A cleanup level were left in place. The lead concentrations remaining in shallow soil were 270 and 290 mg/kg at depths of approximately 1 to 1.5 feet bgs in the west and central portions of the Site. The areas of remaining lead-contaminated soil are capped by asphalt.

Given the extensive remediation and limited, isolated areas of remaining soil contamination that are capped by asphalt, no further action is warranted at the Site, in our opinion.

## References

- Galloway Environmental, Inc. 2007. Sound Transit – Lakewood Station, Lakeview Auto Property, Underground Storage Tank Decommissioning Report. June 14, 2007.
- Shannon & Wilson, 2006. Environmental Report, Lakeview Auto Property, Lakewood Station, Lakewood, Washington. January 24, 2006.
- Shannon & Wilson, 2008. Remedial Action Report, Sound Transit Lakewood Station, Lakewood Washington. September 19, 2008.
- URS, 2003. Phase II Environmental Site Investigation Report, Lakeview Auto Wrecking Property, 11528 Pacific Highway SW, Lakewood, Washington. August 25, 2003.
- Washington Department of Ecology, 2006. Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site: Lakeview Auto Wrecking Property, March 27, 2006.

## Closing

Based on the investigations and remedial actions performed and the presence of the transit center capping the parcel, Sound Transit is requesting a no further action determination for the Lakeview Auto Wrecking Property.

Sincerely,  
GeoEngineers, Inc.

*Marsi M. Beeson*

Marsi M. Beeson  
Senior Environmental Scientist

MMB:DLC:leh

### Attachments

Attachment A. VCP Eligibility Form and VCP Application

Attachment B. VCP Agreement

Attachment C. Remedial Action Report, Sound Transit Lakewood Station, Lakewood Washington, by Shannon & Wilson, Inc.  
September 19, 2008

Attachment D. Lakeview Auto UST Removal Documentation

Attachment E. Lakeview Auto Property Terrestrial Ecological Evaluation Form

One electronic copy submitted

Disclaimer: Any electronic form, facsimile or hard copy of the original document (email, text, table, and/or figure), if provided, and any attachments are only a copy of the original document. The original document is stored by GeoEngineers, Inc. and will serve as the official document of record.



Dana Carlisle, P.E.  
Principal