

November 15, 2024

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

Attention: Kelli Price - SEPA Coordinator, Anthony Wenke, Toxics Cleanup Program Manager

Re: **Soil Remediation at 16616 NE Woodinville Duvall Road**  
**File# SDL24004/SEP24011, Ecology SEPA# 202404139**

Dear Mr. Wenke and Ms. Price:

On behalf of our clients, Cribmates Holdings, LLC and Curtis Sparks, we have reviewed your October 4, 2024 "SEPA Notice Comment Letter" for the above-mentioned site. That letter was in response to a State Environmental Policy Act (SEPA) notice of application.

In your letter, you indicated that the proposed action is only interim action and recommended that we take additional action to get an NFA. Our actions at the site are geared specifically towards that goal and our enrolling in the VCP Program would be part of that process at which time we would have presented the supporting documentation for our actions necessary to cleanup contamination at the above-mentioned Site.

In the letter Ecology Makes the following recommendations:

1. Review this information and coordinate with the lead Agency (City of Woodinville) to update their checklist responses accordingly.
2. Provide Ecology with newer report documentation on the Site, if available, and incorporate this information into their responses accordingly.
3. To obtain a No Further Action status under MTCA, Ecology recommends the liable party request regulatory oversight on their proposed independent action by enrolling in Ecology's Voluntary Cleanup Program Voluntary Cleanup Program - Washington State Department of Ecology. Under the VCP program, Ecology can offer the applicant and liable party technical assistance during the project to ensure independent actions performed in the future at the Site are in compliance with the regulatory standards of MTCA.

#### ECOLOGY COMMENTS AND ECI CLARIFICATIONS

1. *Review this information and coordinate with the lead Agency (City of Woodinville) to update their checklist responses accordingly.*

ECI has updated the SEPA Checklist with the City of Woodinville

2. *Provide Ecology with newer report documentation on the Site, if available, and incorporate this information into their responses accordingly.*

## Response to Ecology – October 4<sup>th</sup>, 2024 SEPA

16616 NE Woodinville-Duvall Road

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October 24, 2024

Several environmental investigations have been completed in recent years leading to the development of the proposed cleanup action at the site. Specifically, in 2022 Terra Associates performed a comprehensive sub-surface investigation “Phase II Environmental Site Assessment - Sparks Parcel” (provided with this letter) dated November 8, 2024. The investigation covers the areas identified in previous investigations and site assessments with a myriad of test pits, borings, and wells. The resultant data provides the basis for this cleanup action. Specifically, only cadmium and lead were identified having concentrations exceeding MTCA and only identified in the areas covered under the scope of this cleanup action. 40 borings test pits and monitoring wells were advanced in connection with this investigation. Based on this information the action proposed in this remedial action was planned to address these MTCA exceedances.

3. *To obtain a No Further Action status under MTCA, Ecology recommends the liable party request regulatory oversight on their proposed independent action by enrolling in Ecology's Voluntary Cleanup Program Voluntary Cleanup Program - Washington State Department of Ecology. Under the VCP program, Ecology can offer the applicant and liable party technical assistance during the project to ensure independent actions performed in the future at the Site are in compliance with the regulatory standards of MTCA.*

Originally, ECI was going to submit the Cleanup Action Plan and Cleanup Action Results as part of entrance into the VCP program following the completion of the Cleanup Action (Summer 2024). As of this letter, the Site is being entered into the VCP Program. We expect it will take 3 months for a Site Manager to be assigned and another 3 to 6 months to receive our requested opinion.

### FURTHER ECOLOGY COMMENTS AND ECI CLARIFICATION

Ecology States additionally:

*“Site conditions that are previously reported to Ecology and noted in the bullets below are not reflected in the applicant's responses to the SEPA checklist questions 7.a. 1-5:*

- *The proposed project is located within the parcel boundary of a contaminated Site (parcel 0126059029) that is reported on Ecology's Confirmed and Suspected Contaminated Sites list (CSCSL). The cleanup site name is JOHNNYS WRECKING YARD (Facility Site ID 2446, Cleanup Site ID 2906). Johnnys Wrecking Yard - (2906) (wa.gov).*
- *An initial investigation was performed by Ecology in 1993. This investigation was due to repeated anonymous complaints regarding various soil contamination and solid waste issues with this Site. An above ground storage tank with staining under the spigot and stained soil surrounding barrels of waste oil resulted in the site being placed on the CSCSL.*
- *A Site Hazard Assessment (SHA) was conducted by Public Health – Seattle & King County in 1996. Stained soil surrounding two 55-gallon drums of waste oil, a large amount of metal waste debris, approximately 8,000 vehicle tires and various other solid waste items were observed on site. A soil sample was taken by the waste oil barrels and showed a Total Petroleum Hydrocarbon (TPH) Diesel level of 29,000 ppm and a TPH- Gas level of 990 ppm. Two additional soil samples were taken in the auto processing area and had TPH-Diesel (1500 ppm), lead (650 ppm) and cadmium (11.0 ppm) levels all above Model Toxics Control Act (MCTA) cleanup levels. The horizontal extent of impacted soil reported in the 1996 SHA is approximately 3800 square feet. Ecology ranked the site as “2 - Moderate-High Risk” under Washington's ranking method (WARM). In 2024 under the new MTCA rule, the WARM ranking system was replaced by the Site Hazard and Ranking Procedures (SHARP). This Site has not been ranked under the newer SHARP.” end quote*

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As explained above, much has changed at the site since 1996. Vast quantities of debris noted during the SHA are no longer on the site, locations of elevated concentrations have been sampled and test pitted, the results of these investigations are detailed in the attached investigation documents, and it is our view that the site hazards have been significantly reduced through time and attenuation.

**CLOSING**

ECI and our client appreciate your review of the work on this site and will be moving forward in preparing the drafts of Cleanup Action Plan and entry into VCP. We are formally requesting a Mitigated Determination of Non-Significance (MDMS) with the Site Investigation and Remediation being managed through the Voluntary Cleanup Program.

Should you have any questions or comments regarding this letter, please contact me.

Sincerely,

ECI | Environmental Consulting



Brad N. Reilly

Senior Project Manager

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