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"RCRA/TSCA" "Permits Team"

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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

January 30, 1997

CERTIFIED MAIL P 115 514 013

Mr. John S. Banchero President Northwest EnviroService, Inc. 54 Dawson Street Seattle, Wa 98134

Dear Mr. Banchero:

Re: Review of soil and concrete data, dated August 5, 1996 for the Northwest EnviroService, Inc., Western Blower Property Area, Seattle, Washington, WAD058367152

Based upon the review of the report submitted on August 5, 1996 of the sampling results for the Western Blower Property of Northwest EnviroService, Ecology understands the following:

- This area of the property does not have a RCRA regulated storage unit, therefore RCRA clean closure is not a requirement. But, the Western Blower Property area is considered a solid waste management unit (SWMU) under RCRA for the NWES facility and is subject to RCRA corrective action.
- 2. RCRA financial assurance for closure would not be required for this area.
- On the Western Blower Property there are soils and concrete on site that exceed the MTCA Method A or B cleanup levels as established in Chapter 173-340 WAC. These constituents are TPH, Arsenic, Beryllium, Cadmium, Lead, and Benozo(a)pyrene. Assuming that the site is zoned as industrial use only, the

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> existing concentrations of contaminants in the soil and concrete would not require additional removal actions or decontamination as long as specific institutional controls are undertaken.

[NOTE: RCRA Clean Closure as defined in WAC 173-303-610(2)(b) states the use of MTCA Method A and B cleanup levels as clean closure standards.]

4. The direction of groundwater flow is still undetermined for this portion of the TSDF.

Based on the review of this information, Ecology has determined that no further action is required under RCRA <u>only</u> for the Western Blower portion of Northwest EnviroService with the following conditions:

- 1. If any subsurface contamination (in either soils or groundwater) is found, additional investigations will be addressed though MTCA.
- 2. Because contamination in excess of MTCA Method A and B cleanup standards remains on the property, a restrictive convenant recorded with the property deed at the office of the King County Clerk must be filed. The restrictive covenant recorded on the property deed must include a notice that there are constituents (Arsenic, Beryllium, Lead, Cadmium, TPH, Benzo(a)pyrene) that exceed MTCA Method A or B cleanup levels in the soils. NWES shall submit to Ecology within 90 days of the date of this letter a copy of the notice to the deed for the property that complies with the requirements of WAC 173-340.
- 3. If this portion of the property is ever sold, NWES shall within 30 days of the sale of the property:
 - a) submit changes to the facility's Part A form and;
 - b) notify Ecology's Toxics Cleanup Program's Site Management Information System's (SMIS) List of the new site name. The Ecology contact in the Northwest Regional Office is Louise Bardy at (206) 649-7209.
- 4. If concrete is ever removed from this site, designation and handling as necessary per WAC 173-303 would be required.

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If you have any questions, please call Sally Safioles at (206) 649-7026 or Christy Brown at EPA at (206) 553-8506.

Sincerely,

Julie Sellick Section Supervisor, NWRO HWTR Program

cc:

Christy Brown, EPA Hideo Fujita, Ecology-NWRO Sally Safioles, Ecology-NWRO Carolyn Kossik, CH2M Hill