



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 14, 2013

Mr. Greg Draper  
20 Enatai Drive  
Bellevue, WA 98004-7408

**Re: Opinion Pursuant to WAC 173-340-515(5) on Request for Removal from the Hazardous Site List for the Following Hazardous Waste Site:**

- **Name:** UCO Corporation
- **Address:** 9225 151st NE, Redmond, WA
- **Facility/Site No.:** 2533
- **CS ID:** 2669
- **VCP No.:** NW2710

Dear Mr. Draper:

Thank you for submitting documents regarding your proposed remedial action for the UCO Corporation facility (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Total Petroleum Hydrocarbons (TPH) heavy oil and associated carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the soil
- Benzene into the soil
- Metals including aluminum, lead, cadmium and chromium into the soil

UCO Corporation is a manufacturer of outdoor, recreational products made from aluminum. In 1993, the Redmond Fire Department responded to a complaint regarding improper disposal of aluminum shavings and petroleum products into a planter area north of a paved parking lot on



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the west side of the former UCO building. Seattle-King County Department of Public Health conducted a site hazard assessment (SHA) in 1999 (WARM ranking = 5 ) and collected soil samples confirming the presence of heavy oil (3,200 mg/kg at 8 inches below ground surface) above the MTCA Method A cleanup level. The dimensions of the affected area were estimated to be eight by 12 feet.

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial actions:

1. Terra Associates, Inc., *Remedial Investigation, Former UCO Facility 9225 151<sup>st</sup> Avenue NE, Redmond, Washington, King County Tax Parcel 720170-0051*, Received April 2, 2013.

The report listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7235 or sending an email to [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

The Site is defined by the extent of contamination caused by the following release(s):

- Total Petroleum Hydrocarbons (TPH) heavy oil and associated carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the soil
- Benzene into the soil
- Metals including aluminum, lead, cadmium, chromium into the soil

The description of the Site is based solely on the information contained in the document listed above.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site, Ecology has determined:**

- Characterization of the Site is incomplete. The vertical extent of carcinogenic polycyclic aromatic hydrocarbons (cPAHs) was not delineated at soil borings TP-6 and TP-4. The horizontal extent of cPAHs has not been delineated south of soil boring TP-6. Soil contamination in the vicinity of TP-4 may extend beneath the building to the north. Additional soil borings are needed to delineate the extent of cPAH contamination in the soil. A figure indicating the location of UCO-1 is needed to illustrate that the chosen sample locations, TP-1 through TP-7, were appropriately placed to confirm Site TPH-O contamination has been addressed.
- A representative groundwater sample is needed from the Site beneath the area of contamination in soil identified to confirm groundwater has not been impacted.
- The Site Identification and Location section should discuss neighboring properties in more detail - both use (be specific) and potential past or present contaminant sources if applicable.
- A Terrestrial Ecological Evaluation (TEE) is required to determine if cleanup levels that are protective of terrestrial species are applicable to the Site. If it is determined the Site qualifies for an exclusion, your TEE decision-making process must be documented as per WAC 173-340-7490. A TEE process interactive user's guide can be found at: <http://www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm>.

**This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action.** To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

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If you have any questions regarding this opinion, please contact me at (425) 649-7097 or e-mail desc461@ecy.wa.gov.

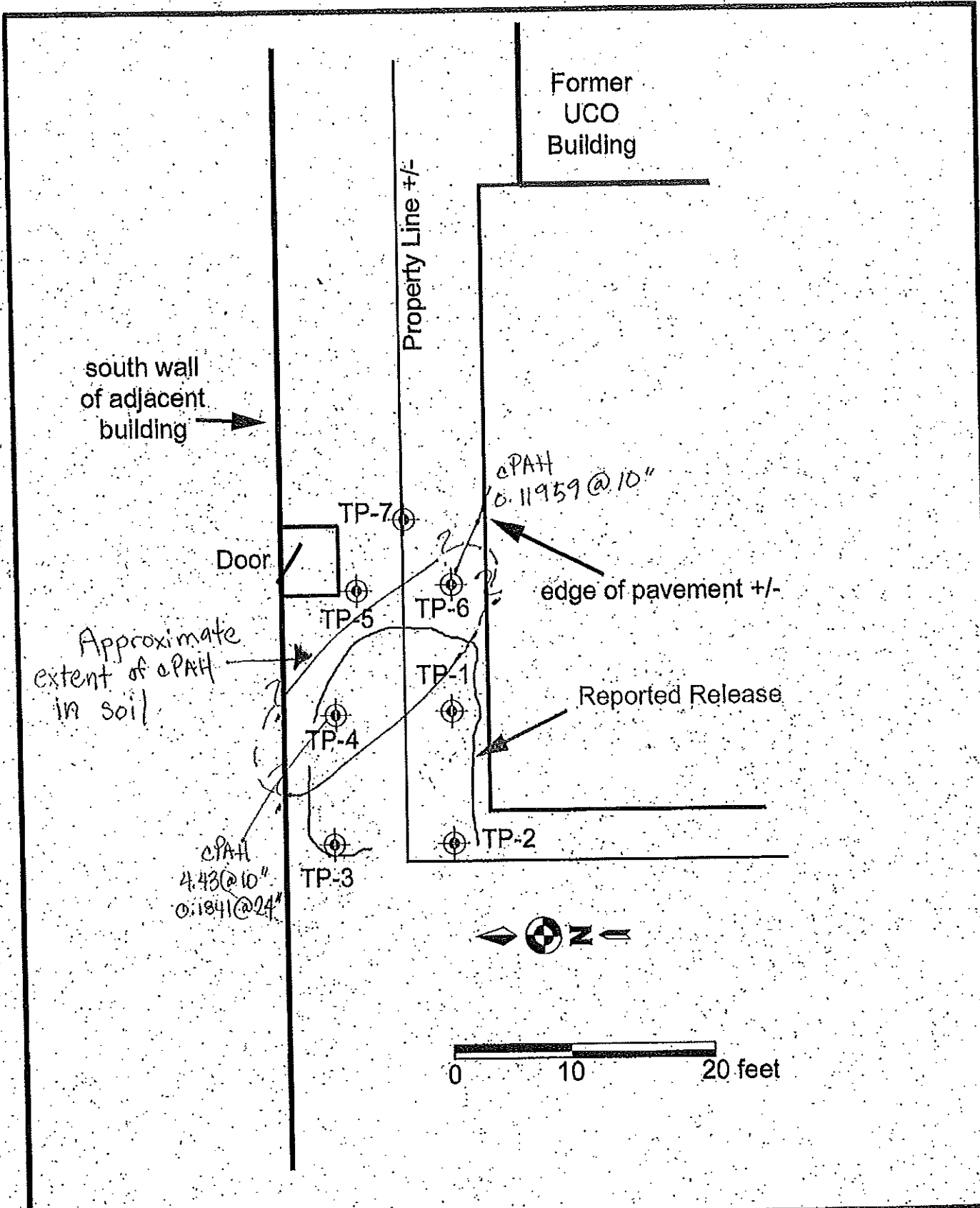
Sincerely,


A handwritten signature in black ink, appearing to read "Diane Escobedo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Diane Escobedo  
Site Manager  
Toxics Cleanup Program

Enclosure: A – Site Diagram

cc: Charles Lie, Terra Associates Inc.  
Sonia Fernandez, VCP Coordinator, Ecology



 **TERRA ASSOCIATES**  
Geotechnical Consultants

Sample Location Plan  
UCO  
Redmond, Washington

Proj. No T-6776	Date March 2013	Figure 5
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