



FILE COPY

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

15 West Yakima Avenue, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

May 22, 2006

Ms. Hester Harding, Corporate Administrator  
Bekins Northwest  
PO Box 67  
Mountlake Terrace, Washington 98043

**Re: Partial Sufficiency and Further Action Determination under  
WAC 173-340-515(5) for the following Hazardous Waste Site:**

- Name: Bekins Moving & Storage
- Address: 1891 North 1<sup>st</sup> Street Yakima, WA 98901
- Facility/Site No.: 21186636
- VCP No.: CE0239

Dear Ms. Harding:

Thank you for submitting your independent remedial action report for the Bekins Moving & Storage Yakima facility (Site) for review by the State of Washington 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 whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. 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 the Site:

1. Foss Environmental, December 31, 1998, Summary of Soil Sampling Activities.



2. Burlington Environmental, Inc., June , 1991, Site Characterization/Interim Action Report
3. U.S. Geological Survey, 1995, Areal Extent of Petroleum-Related Compounds from Gasoline and Diesel-Fuel Leak in Groundwater at a Site in Yakima, Washington, 1984-1989; Water-Resources Investigations Report 92-4017.

The documents listed above will be kept in the Central Files of the Central Regional Office of Ecology (CRO) for review by appointment only. Appointments can be made by calling the CRO resource contact at (509) 454-7658.

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

- Gasoline in soil and groundwater

Gasoline contaminated soil was excavated to 9.5 feet below the ground surface (bgs) at a time of year when the water table was at 8 feet bgs. The gasoline contaminated soil located between 8 and 11 feet bgs appears to have been part of a "smear zone". A "smear zone" is that part of the soil column that becomes contaminated when floating petroleum product is smeared up and down vertically on a fluctuating water table. The petroleum product may have originated from the Bekins 1,000 gallon underground storage tank system and/or from a large release at the Tiger Mart service station located immediately west of the Bekins facility.

Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site are sufficient to meet the substantive 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):**

- Gasoline in soil

**However, the independent remedial action(s) performed at the Site are not sufficient to meet MTCA's substantive requirements for characterizing and addressing the following release(s):**

- Gasoline in groundwater

Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at this Site under MTCA.

The nature and extent of the gasoline release to groundwater has not been determined. In order to determine the nature and extent of groundwater contamination a minimum of three (3) groundwater monitoring wells should be installed (one up gradient and two down gradient). The



Bekins Northwest  
May 22, 2006  
Page 3

groundwater should then be sampled and analyzed for gasoline (NWTPH-GX and BTEX) on a quarterly basis. After the groundwater has tested below the Method A cleanup levels listed in the MTCA for four consecutive quarters, Ecology will consider that the substantive requirements for groundwater cleanup to be met.

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.

If you have any questions regarding this opinion, please contact me at (509) 454-7834.

Sincerely,



Thomas L. Mackie, L.H.G.  
Toxics Cleanup Program - CRO



THOMAS L. MACKIE