



PROJECT SUMMARY

Underground Storage Tank/Petroleum Contaminated Soil
Excavation - September 2013
Copalis Crossing Market
1686 Ocean Beach Road
Copalis Crossing, WA

Site Background

The Site is currently occupied by a convenience store known as the Copalis Crossing Market, and historically been a retail gas station and store since at least the 1980s. The Site's previous underground storage tank (UST) system was in operation prior to 1985. AEG did not have access and was unable to obtain documentation on the usage/operation of the property prior to the 1980s, nor information regarding the Site's fuel tanks and associated tightness tests.

According to the Washington State Department of Ecology (Ecology) Tank Data information, six USTs were part of the recent UST system. Two of those tanks were listed as closed in place. Information regarding the construction and layout of the product lines or other parts of the UST system was not available for review. The UST system was protected by a Veeder 350 leak detection system.

Recent Site Activities – 2011

WA State Department of Ecology – UST Site Inspection (November 2011)

Ecology conducted at UST Site Inspection at the Copalis Crossing Market in November 2011, due to a tank monitoring printout displaying the manifolded tanks full with water. Similarly, AEG reported that the mid-grade fuel tank was also taking water. An Ecology UST inspector visited the Site and issued an Underground Storage Tank Notice of Non-Compliance after verifying a ***“release based on water reading from tank monitor”***.

Ecology issued a request to *“hire a certified site assessor to perform a site check”* on the UST system, to *“sample for the presence of a release in the soil and groundwater around”*, and to close *“either temporarily or permanently”* the tank system (Ecology, 2011).

Copies of the Ecology letter regarding the UST Site Inspection and the notice of non-compliance are included in Attachment A, *Supporting Documents*.

Underground Storage Tank Decommissioning – AEG, 2013

From September 10th through the 17th, 2013, AEG supervised the removal of five USTs from the Copalis Crossing Market Site. A sixth tank, as documented by Ecology in their Tank Database, was not encountered during excavation activities. Prior to the removal of the underground storage tanks, appropriate permits for the UST decommissioning were obtained by AEG's subcontractor Cowlits Clean Sweep, Inc. (CCS), of Longview, Washington. When exposed in the surface, all the USTs were gauged for liquid content and water was encountered in the fill pipe in three of the five USTs. One tank was empty, and one more was filled with cement slurry.

The following is a list of the USTs' individual storage capacities and observations.

Tank 1 = 2,000 gallons capacity. Water in the tank - full

Tank 2 = 4,000 gallons (split tank). Water in both tanks - full

Tank 3 = 6,000 gallons capacity. Water in the tank - full

Tank 4 = 10,000 gallons capacity. Tank empty

Tank 5 = 2,000 gallons capacity. Tank abandoned in place. Filled with cement slurry

USTs removed from the excavation were observed to be in general good condition with no surface pinholes, but the presence of water in the tanks indicates infiltration of groundwater that led to the overfill in the tank and a discharge of fuel in the subsurface.

An approximate area of 1,575 ft² and average depth of 8 to 9 feet was excavated during the removal of the USTs. Soil discoloration, strong gasoline odor, and photo ionization detector readings confirmed contaminated soils by petroleum hydrocarbons starting at an approximate depth of 3 to 4 feet below ground surface (bgs). Soil samples collected from the sidewalls and bottom of the excavation and analyzed for gasoline-range hydrocarbons and associated volatile organics indicated compound concentrations in soil above Ecology's Model Toxics Control Act (MTCA) Cleanup Levels mainly in the southern, southwestern, and northern sections of the excavation sidewalls.

Affected soils were removed to the extent possible on the southern and westerns sidewalls of the excavation before reaching the store building foundation to the south, and Ocean Beach Road's right-of-way to the west. Soil removal towards the east and north sections, and bottom of the excavation continued until clean soils were detected. Confirmation soil samples were collected for laboratory analysis from the sidewalls and the bottom of the excavation.

Perched groundwater was encountered at approximately 9 feet bgs throughout the excavation with sheen observed floating on top. An approximate amount of 15,500

gallons of groundwater was dewatered from the excavation using a suction pump and transferred to a 20,000-gallon capacity Baker Tank stationed onsite.

Excavated soil, and groundwater contained in the Baker Tank were properly disposed of by CCS at the Weyerhaeuser NR Company in Longview, Washington, and at the Oil Refining Company in Portland, Oregon, respectively.

Attachments:

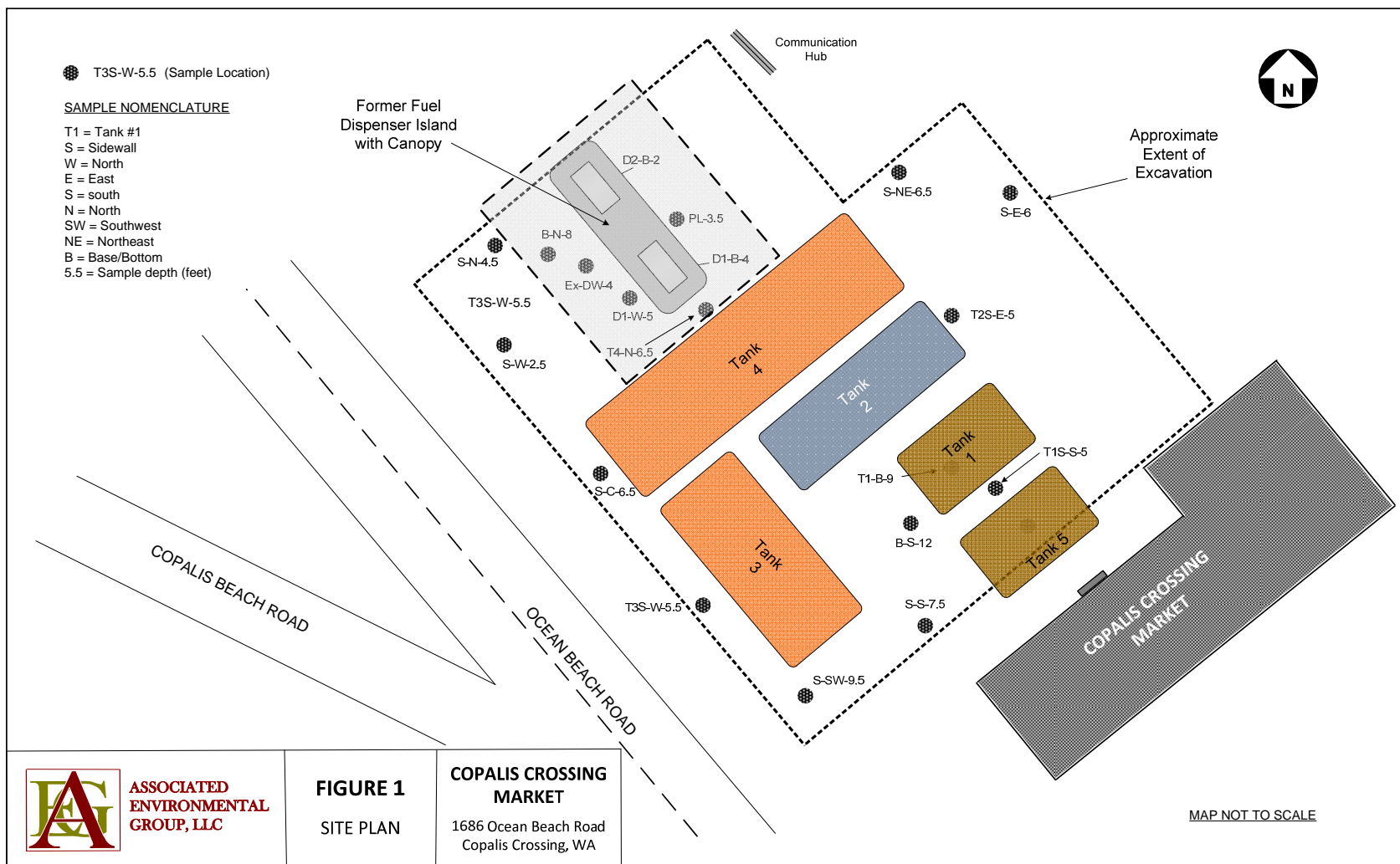
Figures

Figure 1 – *Site Plan*

Supporting Documents

Ecology UST Site Inspection Letter, dated December 20, 2011

Underground Storage Tank Notice of Non-Compliance





STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

December 20, 2011

Mr. Sang Man Kim
Copalis Crossing Texaco
1686 Ocean Beach Road
Copalis Crossing, WA 98536

Dear Mr. Kim:

This letter is to notify you of the need for an Underground Storage Tank (UST) site check at the Copalis Crossing Texaco located at 1686 Ocean Beach Road, Copalis Crossing Washington. UST site # 100669.

On November 17th of 2011 the tank monitor printout for your tanks showed water was entering tank #3. By November 19th the printout from the monitor showed the tank almost full of water and tank #4, which is manifolded to #3, was now taking on water as well. A few days later Mr. Michael Chun, of the Associated Environmental Group, informed me that your mid-grade tank was also taking on water. Mr. Chun informed me that he recommended you remove all fuel from your remaining tanks and proceed with a site investigation. I have yet to receive any documentation.

Under WAC 173-360-370, owners and operators of UST systems are required to investigate and confirm all suspected releases. Owners and operators shall have a certified UST supervisor sample for the presence of a release where contamination is most likely to be present. Results must be reported to Ecology; and the release must be characterized and remediated in accordance with WAC 173-340.

Please hire a certified site assessor to perform a site check on your UST system and sample for the presence of a release in the soil and groundwater around your tank system and report to me the results of this investigation by December 31, 2011. Please remove all fuel from the remaining tanks until further investigation; including tank tightness testing showing the tanks are tight. All tanks must be closed, either temporarily or permanently. I have enclosed the paperwork to begin either of these processes. Please pump all the tanks empty and begin the tank closure process by December 31, 2011.

Ecology can administer field citations and enforcements, including formal orders and penalties of up to \$5,000 per day, per violation, of WAC 173-360. If you have questions, or need assistance you may contact me at (360) 407-6969

Sincerely,

Dean Phillips
Underground Storage Tank Inspector
Southwest Regional Office
Toxic Cleanup Program
360-407-6969
dphi461@ecy.wa.gov

Enclosure: UST Closure Packet

By certified mail: (7010 0780 0002 3403 2605)





Underground Storage Tank Notice of Non-Compliance (NONC)

UST Site ID: 100669

Site Name: Copk/13 Crossing Texaco	Mailing Address:
Site Address: 1686 Ocean Beach	City, State, Zip:
Site City: Copk/13 Crossing	
Site Contact: Sang Man Kim	Phone: 360-289-2911

Ecology Inspector(s): Phillips	Inspection Date: 11-21-11
Inspector Phone: 360-407-6969	FAX: 360-407-6305
	Email: dphill461@ecy.wa.gov
Notice of Penalty Issued <input type="checkbox"/>	Field Citation #

The Department of Ecology is responsible for overseeing environmental laws that protect human health and the environment in Washington State. During this visit, Ecology observed violations of Chapter 173-360 of the Washington Administrative Code, the Underground Storage Tank Regulations.

Violations observed are checked below.

Violation No.	WAC 173-360	Violation
<input type="checkbox"/> 1	130(1)	Operating regulated UST without a valid permit
<input type="checkbox"/> 2	210(2)	Failure of owner/operator to keep and maintain necessary records and/or documentation
<input type="checkbox"/> 3	210(3)	Failure of owner/operator to have necessary records and/or documentation available at the time of inspection
<input type="checkbox"/> 4	305(3)	Failure to provide spill and/or overfill prevention equipment on a new UST system
<input type="checkbox"/> 5	310(4)	Failure to provide spill and/or overfill prevention equipment as an upgrading requirement
<input type="checkbox"/> 6	320(1)	Failure to operate and maintain corrosion protection system to provide continuous protection
<input type="checkbox"/> 7	320(2)(a)	Failure to test cathodic protection system with required frequency
<input type="checkbox"/> 8	320(3)	Failure to inspect impressed current cathodic protection system every 60 days
<input type="checkbox"/> 9	335(1)(b)	Failure to install, calibrate, operate, or maintain release detection method in accordance with manufacturer's instruction
<input type="checkbox"/> 10	335(2)	Failure to properly monitor tanks and/or piping for releases (monthly monitoring or allowed exceptions)
<input type="checkbox"/> 11	345(6)	Failure to conduct tank release detection in accordance with the particular method used
<input type="checkbox"/> 12	350(2)(a)(i)	Failure to equip pressurized piping with automatic line leak detectors
<input type="checkbox"/> 13	350(2)(a)(ii)	Failure to conduct annual line tightness test or monthly monitoring on pressurized piping
<input type="checkbox"/> 14	350(3)(a)	Failure to meet automatic line leak detector requirements including annual testing
<input type="checkbox"/> 15	350(3)(b)	Failure to conduct line tightness testing in accordance with the requirements
<input type="checkbox"/> 16	350(3)(c)	Failure to meet one of the applicable tank methods for piping release detection
<input type="checkbox"/> 17	400	Failure of owner/operator to comply with the financial responsibility requirement
<input checked="" type="checkbox"/> 18	370	Perform site check to verify release of fuel
<input type="checkbox"/> 19		
<input type="checkbox"/> 20		
<input type="checkbox"/> 21		

UST Notice of Non-Compliance continued...

UST Site ID# 100669

Violation No.	What Was Observed and Action(s) Required to Achieve Compliance	Submit to Ecology by
18	Have site check performed to verify release.	
	Release based on water reading from tank monitor. Also pump fuel from tank that is monitored to suspected tank.	
		ASAP

Instructions:

- This Notice of Non-Compliance (NONC) is not an enforcement order and is **not** appealable.
- If a penalty accompanies this NONC, the penalty is appealable.
- Appeal directions are on the back of the penalty.
- Failure to comply with this NONC may result in further enforcement action.

1. You must complete the actions identified above to be in compliance with the UST Regulations.
2. Direct any questions to Debra Phillips Ecology Inspector, at 360-407-6969.
3. To request an extension, submit the written request to the Ecology Inspector by _____.

Please include:

- Reason extension is needed.
- Steps already taken.
- Description of work that remains to be completed.
- Anticipated completion date.

You will be notified if an extension can be granted.

Submit required documentation to the Regional Office indicated:

Central Regional Office	Eastern Regional Office	NW Regional Office	SW Regional Office	Headquarters
15 W. Yakima Ave Ste 200	4601 N. Monroe St.	3190 160 Ave. SE	P O Box 47775	P O Box 47600
Yakima, WA 98902	Spokane, WA 98205	Bellevue, WA 98008	Olympia, WA 98504	Olympia, WA 98504
Phone: 509/575-2490	Phone: 509/329-3400	Phone: 425/649-7000	Phone: 360/407-6300	Phone: 360/407-7170
Fax: 509/575-2809	Fax: 509/329-3572	Fax: 425/649-7098	Fax: 360/407-6305	Fax: 360/407-7154

Ecology Inspector Signature: [Signature] Date: 11-21-11Owner/Operator Signature: [Signature] Date: 11/21/11

Owner/Operator Print Name: _____