

## STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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July 12, 2011

Mr. E. Lee Noble 4629 Gay Avenue West Seattle, WA 98199

Re: No Further Action at the following Site:

• Name: Ballard Auto Wrecking (former)

Address: 1515 Leary Way, Seattle, Washington

• Facility/Site No.: 2346

• VCP Project No.: NW2111

Dear Mr. Noble:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Ballard Auto Wrecking (former) facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

#### Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

#### Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

• Gasoline range petroleum hydrocarbons, diesel range petroleum hydrocarbons and lead into the Soil and Ground Water.

**Enclosure A** includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

#### Basis for the Opinion

This opinion is based on the information contained in the following documents:

- 1. VCP Site Closure Report Former Ballard Auto Wrecking, dated May 2<sup>nd</sup> 2011, prepared by RK Environmental.
- 2. Historic Ecology Site files.

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425.649.7239.

This opinion is void if any of the information contained in those documents is materially false or misleading.

#### Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

#### 1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

#### 2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

Two sets of soil cleanup levels had been established for the Site, one for near-surface soils in the central and western portions of the Site that were impacted by past wrecking yard operations, and the other for deeper impacted soils associated with the UST excavation.

Site-specific groundwater cleanup levels were proposed in a letter to Ecology dated July 8, 2003 (Aspect Consulting 2003b). Brian Sato of Ecology indicated acceptance of these cleanup levels in a follow-up telecom on July 14, 2003 (Ecology 2003).

While MTCA Method A was used for comparison purposes, it is stated in the restrictive covenant that industrial cleanup standards apply, so the Site use must remain industrial. A MTCA Method C industrial cleanup level approach was set forth in the CAP. Outside of the property boundary, where the applicability of the restrictive covenant ends, the cleanup standards default to MTCA Method A.

The point of compliance for soil is throughout the site, which is a standard point of compliance.

The point of compliance for groundwater is throughout the site, which is a standard point of compliance.

#### 3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The selected site cleanup plan focuses on subsurface soil that exceeds Ecology's MTCA Method A soil CULs for unrestricted land use. The subject soil will be permanently removed from the site through excavation and hauling and off-site disposal at a Subtitle D landfill. Removal efforts will be confirmed by collection of discrete soil samples and chemically analyzed for the above listed COCs.

The three areas selected for excavation and sampling, known as the UST, Area A, and Area B Excavations, were first identified in the preceding cleanup work, performed and reported in 2003/2004 (Aspect, 2004). As detailed earlier in this report, several verification sidewall and bottom samples from each of these excavation areas contained soil exceeding Ecology's MTCA Method A soil CUL for unrestricted land uses.

#### 4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

Cleanup activities performed prior to the June 29<sup>th</sup> 2004 NFA letter which required a Restrictive Covenant are described in the Enclosure "Site Description". The cleanup activities described below were performed to remove the Restrictive Covenant.

Deep soil samples that continued to contain concentrations of the site COCs in excess of the unrestricted CULs were targeted for over excavation and resampling. As shown in Figure 2, the former UST Excavation Area had three remaining verification samples that required over excavation. Over excavation in this area was guided primarily by PID readings and faint odors of residual gasoline product in soil. No signs of soil staining or sheen were evident during the excavation efforts.

A total of approximately 320 cy of soil was excavated from this area – of this total, approximately 100 cy was hauled off site for disposal; the remaining soil was segregated, chemically profiled, then returned to the excavation as backfill. After the nearly 320 cy of soil, reaching depths of 14 feet bgs, were excavated, confirmation sidewall and bottom samples were collected from the over excavation. Figure 2 shows that of these samples, 8 were sidewall samples and 2 were bottom confirmation soil samples. Figure 2 shows the final confirmation soil sample locations, including the 3 former samples that were over excavated. Table 1 summarizes sample depths and analytical results, along with the site soil CUL for each analyte.

10 confirmation soil samples collected as part of the former UST Excavation Area over excavation effort contained concentrations of the site-specific COCs below the unrestricted CULs. As a result, this excavation area was deemed complete and the data demonstrate that soil cleanup efforts at the former UST storage area has been achieved.

Near-surface soil samples that continued to contain concentrations of the site COCs in excess of the unrestricted CULs were targeted for over excavation and resampling at Excavation Areas A and B. As shown in Figures 3 and 4, the former Excavation Areas A and B had three and seven, respectively, remaining verification samples that required over excavation. Over excavation in Areas A and B, both a former car storage area, was guided primarily by visual indications of waste oil staining. No significant PID readings or odors were noted.

At Excavation Area A, after a total of nearly 75 cy of soil was excavated (approximately 35 cy were disposed off site and the remaining used as backfill), reaching depths of approximately 3 feet bgs, confirmation sidewall and bottom samples were collected

Figure 4 shows that of these samples, 2 were sidewall samples and 4 were bottom confirmation soil samples. Figure 4 shows the final confirmation soil sample locations, including the 3 former samples that were over excavated. Table 3 summarizes sample depths and analytical results, along with the site soil CUL for each analyte.

At Excavation Area B, after a total of nearly 130 cy of soil was excavated (approximately 40 cy were disposed off site and the remaining used as backfill), reaching depths of up to 4 feet bgs, confirmation sidewall and bottom samples were collected. Figure 3 shows the

final, over excavation confirmation sidewall and bottom samples that comprise of this final excavation area. Table 3 summarizes sample depths and analytical results, along with the site soil CUL for each analyte. Note that Excavation Area B required two rounds of over excavation and sampling efforts. The final over excavation event occurred on March 14, 2011.

Confirmation soil samples contained concentrations of the site-specific COCs below the unrestricted CULs. As a result, these two excavation areas are deemed complete and the data demonstrate that soil cleanup efforts at the former Excavation Areas A and B have been achieved

#### Post-Cleanup Controls and Monitoring

Post-cleanup controls and monitoring are remedial actions performed after the cleanup to maintain compliance with cleanup standards. This opinion is dependent on the continued performance and effectiveness of the following:

#### 1. Compliance with institutional controls.

Institutional controls prohibit or limit activities that may interfere with the integrity of engineered controls or result in exposure to hazardous substances. The following institutional controls *are no longer necessary* at the Site:

Restrictive Covenant

#### Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.
- Leaking Underground Storage Tank List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

#### Limitations of the Opinion

#### 1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

#### 2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

#### 3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

#### **Termination of Agreement**

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW2111).

For more information about the VCP and the cleanup process, please visit our web site: <a href="www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm">www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm</a>. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 425.649.4446 or e-mail at damy461@ecy.wa.gov.

Sincerely,

Dale R. Myers

Site Manager

NWRO Toxics Cleanup Program

dm/kh

Enclosures (1): A – Description and Diagrams of the Site

cc: Mr. RK Kuroiwa

4036 Williams Ave W Seattle, WA 98199

VCP FINANCIAL MANAGER (without enclosures)

# Enclosure A Description and Diagrams of the Site

## **Site Description**

## **Site History**

The property is located at the corner of 15<sup>th</sup> Avenue NW and NW Leary Way in an area zoned for commercial/industrial land use. The Site is approximately 0.68 acres in size (29,621 square feet) with an L-shaped configuration. The land surface is generally flat, sloping gently from a high point in the southeast corner (approximate elevation 40 feet above mean sea level) toward a lower area on the west (34 feet). Standing water tended to collect on the western portion of the property during the wet season and that a sump pump was used to maintain working conditions; however, nothing like that was observed during a recent Site visit, so possibly there has been filling and grading. The Site was secured by fencing around its entire perimeter in the past, but currently it is open to the public. The tax parcel ID number is 2767702105 and the property includes lots 7 through 14 of the Gilman Park Addition. The property is zoned by City of Seattle for industrial use (zoning IG-2), and has been in traditional industrial uses continuously since 1928. Consequently, the property has in the past met the definition of an industrial property under Washington state cleanup regulation (MTCA; Chapter 173-340 WAC).

The property has apparently served three primary uses during the past century, including residential dwellings, a gasoline service station, and auto wrecking. Currently, the property is used to sell Cedar Grove Compost materials. The historical timeline is believed to be:

- Residential dwellings are noted in Sanborn Fire Insurance maps between 1905 and approximately 1917, followed by vacant land from 1917 to 1927;
- Union Oil service station #244 was constructed in 1928 on lots 11 and 12, which are located at the corner of 15<sup>th</sup> Avenue NW and Leary Way (based on tax records);
- The period of operation is unclear, but it is thought that the gasoline service station operated into the 1960s;
- Beginning in the late 1920s, an auto wrecking yard began operations on lots 7 through 10:
- The owners of Ballard Auto Wrecking at the time of cleanup purchased the property occupied by the auto wrecking yard (lots 7 through 10) in 1959; and
- Those owners of Ballard Auto Wrecking purchased lots 11 through 14 on the corner of 1501 Avenue NW and Leary Way, expanding their operation to the current footprint.

The historical features associated with the former gasoline station include the potential presence of underground storage tanks (UST) and residual petroleum hydrocarbons in the northeast corner of the property.

The property operated as an auto wrecking yard, but after the cleanup activities that operation was closed and the automotive inventory was removed. The property then included a small office with a parts counter, a garage-like structure, covered areas with shelving for parts storage, and

open areas used for additional storage. These structures were removed and the property was vacant for a time before the current business located there.

One UST fill pipe has been located near the garage in the northeast corner of the Site. The property owners indicated that additional USTs may have been present in the same general area, remaining from prior use at a gasoline service station. The fill port for the known UST has been covered by compacted dirt in the driveway area for years and it was exposed in August 2002 to assist with an environmental assessment. The fill port was located uncapped. The tank was approximately 10 feet deep below ground surface (bgs) and 4,200 gallons of water and oil was pumped out by Basin Oil Recovery for recycling/disposal.

Aspect Consulting completed a phased assessment of soil and groundwater conditions on the Ballard Auto Wrecking property.

- Twelve soil borings (P-l through P-12) and three shallow monitoring wells (MW-1 through MW-3) were completed in June 2002 in areas where Site reconnaissance and historical information indicated the greatest potential for subsurface environmental problems.
- Ten additional soil borings (P-100 through P-109) were completed in July 2002, to further assess conditions in areas where the initial test results identified impacts. The subsurface explorations were completed by Cascade Drilling using a truck-mounted probe drilling rig, with the exception of three interior locations completed by hand auger (P-7, P-8, and P-9).
- Six borings (B-1 through B-6) were completed in February 2003, by hollow-stem auger to characterize specific hydrocarbon fractions present within areas of residual petroleum impacts, and allow calculation of Site-specific petroleum soil cleanup levels in accordance with MTCA. An additional groundwater sample was also collected from monitoring well MW-1 at this time.

The Site is underlain by relatively dense soils and groundwater ranging in depth from 6 to 9 feet bgs in July 2002. Explorations extended to a maximum depth of 15 feet bgs; however, refusal at depths of 8 to 12 feet bgs was typical. There were three primary soil horizons encountered. These soil units consisted of:

- Surficial Fill. Mixture of sand, gravel, and silt with metallic, wood, and glass debris fragments. This surficial unit is relatively loose compared with the underlying glacial soils:
- Dense silty SAND and sandy SILT. Dense layer of predominantly fine grained soils varying in thickness across the Site. These deposits are typically 4- to 6-feet thick in the central portion of the Site. The unit thins to 1-foot toward the west and it is absent below the eastern side of the Site; and

• Very dense SAND. Glacially-overridden soils forming an extremely dense layer beneath the Site Typically saturated below depths of 8 to 9 feet bgs.

The uppermost water-bearing horizon is within the very dense SAND horizon. Depth to water measured in the three monitoring wells ranged from 6.3 feet (MW-3) to 9.7 feet (MW-1) bgs. Groundwater flow direction is anticipated toward the south with ultimate discharge to the Ship Canal, located about 800 feet to the south.

The chemical testing program was developed to address potential contaminants associated with the historical use of the property as a wrecking yard and gasoline service station. Aspect Consulting tested for the following potential contaminants at the Site:

- Total petroleum hydrocarbons (TPH) in the gasoline, diesel, and oil-range using methods NWTPH-G and NWTPH-D extended, assessing impacts of petroleum handling across the Site;
- TPH fractions in the gasoline, diesel, and oil ranges using the volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH) analytical methods to allow calculation of risk-based soil cleanup levels for petroleum (MTCA Method B or C).

Cleanup construction took place primarily between September 15 and October 2, 2003 with Aspect Consulting overseeing. Construction activities included removal of three underground storage tanks (USTs) associated with former service station operations, and excavation and off-Site treatment/disposal of impacted soils exceeding soil cleanup levels. Two sets of soil cleanup levels had been established, one for near-surface soils in the central and western portions of the Site that were impacted by past wrecking yard operations, and the other for deeper impacted soils associated with the UST excavation.

Prior to excavation, there was evidence of only one UST (a single fill pipe discovered at ground surface during the Site investigation). However, two 3,500-gallon and one 1,800- gallon USTs were found at that location. Water and product were pumped from the USTs prior to cleaning, inerting, and removing them. Approximately 120 cubic yards (cy) of soils were excavated as part of the UST removal, including roughly 20 cy of overburden soils and 100 cy of soils impacted by petroleum products (primarily gasoline and diesel). Impacted soils were excavated to depths up to 14 feet bgs. Groundwater with a sheen was observed at a depth of approximately 13 feet bgs, and approximately 1,100 gallons were pumped from the excavation prior to backfilling.

Chemical analysis of verification soil samples collected from the UST excavation bottom and sidewalls demonstrated that soil cleanup levels had been achieved. The overburden soil was then backfilled to the UST excavation along with clean imported fill to restore grade. The stockpile of impacted UST excavation soil (154 tons) was removed from the Site and disposed of as non-

hazardous solid waste at Rabanco's Roosevelt Regional Landfill. One hundred seventy two tons (approximately 114 cy) of near-surface soils impacted by diesel- and oil-range petroleum hydrocarbons and lead were excavated from two areas within the central and western portions of the Site. After verification sampling demonstrated that soil cleanup levels were achieved, clean imported soil was backfilled to these areas to restore grade.

Waste characterization sampling and analysis determined that stockpiled near-surface soils failed the Toxicity Characteristic Leaching Procedure (TCLP) criterion for lead. These soils were transported to Chemical Waste Management's facility in Arlington, Oregon, for treatment via chemical stabilization. The stabilized soil was then disposed of at that facility's hazardous waste landfill.

Groundwater monitoring occurred after cleanup activities to confirm that the quality of groundwater migrating from the Site is protective of the Ship Canal. Site-specific groundwater cleanup levels were proposed in a letter to Ecology dated July 8, 2003 (Aspect Consulting 2003b). Brian Sato of Ecology indicated acceptance of these cleanup levels in a follow-up telecom on July 14, 2003 (Ecology 2003).

Monitoring wells were installed in accordance with the Cleanup Action Plan (CAP) around the perimeter of the property. The first round of quarterly post-construction groundwater compliance monitoring was performed on November 25, 2003. Prior to sampling wells MW-4 through MW-7. depth to groundwater was measured in each well, which allowed the consultant to calculate groundwater elevations and estimate flow direction. Based on these measurements, the inferred groundwater flow direction was to the east-southeast, compared with an expected southerly flow toward the Ship Canal. Groundwater flow at the Site may be influenced by subsurface drainage features associated with the elevated 15th Avenue NW overpass. MW-8 was installed downgradient of the former UST area prior to the second round of monitoring. The second round of compliance monitoring was performed on February 20, 2004. Groundwater elevations measured during this round indicated an extremely flat water table in the central portion of the Site (i.e., elevations in wells MW-4, MW-5, MW-7, and MW-8 were within 0.05 feet of each other). Groundwater flow direction could not be reliably inferred in this area. However, based on elevations measured in wells MW-5, MW-6, and MW-8, the inferred groundwater flow direction in the southern portion of the Site was between southeast and south-southeast. Since well MW-5 is located roughly downgradient of MW-4 and along the upgradient edge of the property's southern leg, groundwater samples were not collected from that well in the second round of monitoring.

Groundwater monitoring samples were submitted for the following chemical analyses:

• Arsenic and lead using EPA Method 6010;

- Benzene, toluene, ethylbenzene, and xylenes (BTEX) and naphthalene using EPA Method 8260;
- Gasoline-range total petroleum hydrocarbons (TPH) using Method NWTPH-Gx; and
- Diesel- and oil-range TPH using Method NWTPH-Dx.

For analytes with no established Site-specific cleanup level, the MTCA Method A groundwater cleanup level was used as a screening level value. In both monitoring rounds, low concentrations of diesel-range TPH were detected in each well sampled, and gasoline-range TPH was detected in upgradient well MW-7. None of these detections exceeded Method A cleanup levels. BTEX was not detected in any Round 1 sample. In Round 2, benzene was detected in well MW-7 at a concentration of 1 microgram per liter (ug/L), which is less than the Site-specific cleanup level of 1.2 ug/L. Toluene concentrations in the range of 1 to 4 ug/L were detected in the four wells sampled, compared to a cleanup level of 6,800 ug/L. Xylenes were detected in well MW-7 at 3 ug/L, compared to a Method A cleanup level of 1,000 ug/L. Dissolved arsenic was detected at low concentrations in several groundwater samples during both monitoring rounds. The highest arsenic detection (in well MW-5 during Round 1) was 1.63 g/L, which is less than one-third the Site-specific cleanup level. In both monitoring rounds, concentrations of oil-range TPH, naphthalene, and dissolved lead were below detection limits in all wells sampled.

Groundwater elevations measured in these wells since monitoring was initiated (2003) have consistently indicated a flow direction toward the south southeast. Given this flow direction, it was decided to install MW-8 to monitor groundwater quality at the property boundary downgradient of the former UST area. Furthermore, since monitoring well MW-4 was considered cross- to up-gradient of the former UST area, Ecology allowed the removal of that well from the monitoring program, as long as the groundwater flow direction continued to be measured in a roughly southeasterly direction.

Ecology issued a 'No Further Action' (NFA) letter June 29, 2004 after a restrictive covenant was recorded with the county. The NFA letter also required additional compliance groundwater monitoring. Four consecutive quarterly groundwater monitoring results from August and November 2007 and February and June 2008 were performed by the current owner of the property. Groundwater samples were collected for chemical analysis since November 2003, including the latest four consecutive quarters ending in June 2008. All four existing monitoring wells (MW5 through MW-8) were sampled at the August and November 2007 and February and June 2008 events. Groundwater samples were submitted to Friedman & Bruya, Inc. for the following chemical analysis:

- Dissolved arsenic, barium, chromium, and lead using EPA Method 6010;
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) and naphthalene using EPA Method 8260;

- Total petroleum hydrocarbons (TPH) quantified in the gasoline range using Method NWTPH-Gx; and
- Diesel- and oil-range TPH using Method NWTHP-Dx.

Chemical analytical results from monitoring wells MW-5 through MW-8 for the last four quarterly monitoring events were consistently below the corresponding cleanup levels and screening levels. Significant findings included:

- TPH quantified as diesel in well MW-6 was measured at 1,000 ug/L in July 2006, exceeding the cleanup level of 500 ug/L. However during the last four consecutive rounds performed between 2007 and 2008, diesel concentrations were measured below the laboratory detection limit of 50 ug/L.
- TPH quantified as diesel and gasoline in well MW-8 (downgradient well) declined since the August 2004 sampling round exceedances. There were also diesel exceedances in 2005 and 2006. The results for the last four rounds were all below the Site cleanup level of 500 ug/L, ranging between 180 and <50 ug/L/
- Dissolved lead concentrations in well MW-8 have decreased from 2.04 ug/L in July 2006 to below the Site-specific cleanup level of 1.8 ug/L. The results for the last four rounds ranged between 1.56 and <1 ug/L, all below the Site cleanup level.
- For each of the last four quarterly monitoring events, all remaining analytes measured in monitoring wells MW-5 through MW-8 were either below the laboratory detection limit or below the Site's groundwater cleanup level.

Results of laboratory analyses for required analytes specified in the CAP were measured below the Site-specific groundwater cleanup levels. Therefore, the consultant and owner, in accordance with Ecology's Independent Remedial Action and NFA determination letter, dated June 29, 2004, requested that Ecology eliminate the NFA conditional requirement of continuing groundwater monitoring. They also requested that the restrictive covenant be removed. Ecology agreed that the groundwater monitoring could cease, but that it was not appropriate to remove the covenant, and issued a letter to that effect April 21, 2009.

Two sets of soil cleanup levels had been established in the CAP, one for near-surface soils in the central and western portions of the Site that were impacted by past wrecking yard operations, and the other for deeper impacted soils associated with the UST excavation.

Site-specific groundwater cleanup levels were proposed in a letter to Ecology dated July 8, 2003 (Aspect Consulting 2003b). Brian Sato of Ecology indicated acceptance of these cleanup levels in a follow-up telecom on July 14, 2003 (Ecology 2003).

While MTCA Method A was used for comparison purposes, it is stated in the restrictive covenant that industrial cleanup standards apply, so the Site use must remain industrial. A MTCA Method C industrial cleanup level approach was set forth in the CAP. Outside of the property boundary, where the applicability of the restrictive covenant ends, the cleanup standards default to MTCA Method A.

Based on the Site use, surface cover and cleanup levels, it was determined that the Site was eligible for a 'No Further Action' determination if a Restrictive Covenant was recorded for the property. A Restrictive Covenant was recorded for the Site in 2004.

# Site Diagrams







