



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 14, 2013

Mr. James B. Rose
Northwest Hardwoods Arlington LLC
3316 Fuhrman Avenue East, Suite 200
Seattle, WA 98102

**Re: Opinion Pursuant to WAC 173-340-515(5) on Remedial Action for the Following
Hazardous Waste Site:**

- **Site Name:** Northwest Hardwoods Arlington
- **Site Address:** 20015 67th Avenue NE, Arlington, WA 98223
- **Cleanup Site ID:** 12176
- **Facility/Site No.:** 36489214
- **VCP No.:** NW2764

Dear Mr. Rose:

Thank you for submitting documents regarding your proposed remedial action for the Northwest Hardwoods Arlington (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 at the Site:

- Petroleum hydrocarbons in soil.

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.



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

1. Adapt Engineering, *Limited Phase II Environmental Site Assessment, Former Weyerhaeuser Mill Property*, dated May 28, 2013.
2. Adapt Engineering, *Phase I Environmental Site Assessment and Limited Environmental Compliance Review* dated December 2011.

The reports 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 by sending an e-mail to nwro_public_request@ecy.wa.gov.

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

- Petroleum hydrocarbons in soil.

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:**

- The *Level I Environmental Site Assessment, Weyerhaeuser NR Company, Northwest Hardwoods* dated September 23, 2010, is not in Ecology's file. This report and all other reports pertinent to the Site should be submitted to Ecology.
- Current and historical potential sources of contamination have not been adequately identified. The potential source areas and contaminant pathways have not been adequately considered. All of the Recognized Environmental Conditions mentioned in the conclusions of the *Phase I Environmental Site Assessment* dated December 2011 should be further investigated.
- Based on information provided to date, there is the potential for commingling of contaminants in groundwater. It may be necessary to analyze soil and groundwater samples for additional constituents.
- Samples collected and analyzed from the suspected location of buried drums should be analyzed for all potential contaminants based on knowledge of previous use and storage of hazardous materials. Surface geophysical methods, such as ground penetrating radar (GPR), could aid in confirming the presence of buried drums and thus determining optimal soil sampling locations if drums are located.
- It is unclear why the septic leach fields were screened for petroleum hydrocarbons. More information regarding floor drains, below-grade mechanic pit, parts washer, septic system

pipng, and possible/known contaminants introduced to the septic systems should be submitted.

- Current and historic use, handling, storage and disposal practices of hazardous materials should be provided. The Property is said to be an "abandoned sawmill". It is not clear if all aboveground storage tanks (ASTs) have been decommissioned and all hazardous materials removed from the Property. For clarification, a discussion regarding current and potential or proposed future use of the Property should be provided.
- Sufficient information, including background information and maps, regarding the locations of the five underground storage tanks (USTs) has not been provided. Ecology recommends submitting plan view figures with the outlines of former UST locations relative to the sampling locations shown as well as any information regarding the capacities and depth of the USTs.
- For the 10,000-gallon steel UST that was closed in place, Ecology recommends conducting a GPR survey to determine the location of this UST if documentation is not available.
- Grid sampling should be used where knowledge of releases is uncertain or incomplete. See Ecology's "Guidance on Sampling and Data Analysis Methods", publication number 94-49.

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 at 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

cc: John Bhend, Adapt Engineering
Sonia Fernandez, VCP Coordinator, Ecology