



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

December 5, 2007

Mr. Tom Ramsey
Trinity Lutheran College
4221 228th Av SE
Issaquah, WA 98027

Dear Mr. Ramsey:

Re: No Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site:

- Name: Trinity Lutheran College
- Address: 4221 228th Av SE, Issaquah, WA 98027
- Facility/Site No.: 8712818
- VCP No.: NW1785

Thank you for submitting your independent remedial action report for the Trinity Lutheran College 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. Cleanup Action Report, Trinity Lutheran College, 4221 228th Avenue SE, Issaquah, Washington dated April 23, 2007, prepared by Urban Redevelopment, LLC.



2. UST Decommissioning Report, 4221 228th Avenue SE, Issaquah, Washington dated July 26, 2007, prepared by Sound Environmental Strategies.

The documents 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) 649-7190.

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

- Total petroleum hydrocarbon and polycyclic aromatic hydrocarbons in soil in the detention pond;
- Total petroleum hydrocarbon as diesel in soil in the area where the former 500-gallon heating oil UST was located adjacent to the access road, approximately 70 feet southeast of the pool and gym building.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) conducted 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 contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **no further remedial action is necessary** at the Site under MTCA.

Based on this no further action determination, Ecology will update the status of the Site on its site database and remove the Site from the Confirmed and Suspected Contaminated Sites List.

This no further action determination does not apply to any other release(s) or potential release(s) of contaminant(s) that may impact any other portion of any property impacted by this Site, or any other property owned or operated by Trinity Lutheran College.

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 and further remedial action may be required at the Site.

Mr. Ramsey
December 5, 2007
Page 3

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 successfully completing cleanup under the Voluntary Cleanup Program (VCP). If you have any questions regarding this opinion, please contact me at (425) 649-4310.

Sincerely,

A handwritten signature in black ink, appearing to be 'JL' followed by a stylized flourish.

Jing Liu
NWRO Toxics Cleanup Program

JL:kp

Enclosure: 1

cc: John F. Funderburk, Sound Environmental Strategies Corporation

Enclosure A

The site is approximately 44 acres, and currently occupied by Trinity Lutheran College. A detention pond is located on the property, and used for containment of the stormwater and water expelled from the swimming pool and boiler. A 500-gallon heating oil underground storage tank (UST) used to be located adjacent to the access road, approximately 70 feet southeast of the pool and gym building.

There are two separate contaminated areas on this Site. One is located in the detention pond. The surface soil was contaminated by petroleum hydrocarbons and polycyclic aromatic hydrocarbons (PAHs). The other contaminated area is associated with the former UST. Diesel range petroleum hydrocarbon (TPH-D) exceeded the MTCA Method A cleanup level in soil sample collected beneath the former UST. No groundwater was encountered during tank removal, which reached 13.5 feet below ground surface.

Contaminated soil was excavated from the detention pond and its three discharge outlets. The excavated area was restored with rip rap, and a discharge weir was created to contain any possible future release of oil. All the soil confirmation samples collected meet the MTCA Method A cleanup levels for total petroleum hydrocarbons. Also, the TEF adjusted cPAHs concentrations from all the soil confirmation samples were below the MTCA Method A cleanup level. In addition, the 95% UCL was calculated for each of the cPAHs, and the results were below the MTCA Method A cleanup level.

The UST was decommissioned and removed. However, the product line was not removed outside the UST excavation area due to close proximity to the buried utilities. The product line did not show evidence of leaking heating oil.

Approximately 80.62 tons of petroleum-contaminated soil (PCS) were excavated and disposed of off-site. Oxygen release compound was applied to the sidewalls and floor of the excavation after PCS removal and before backfilling in order to make any residual PCS to break down at a faster rate and augment the bio-degradation of the residual PCS. Soil confirmation samples showed compliance with the MTCA Method A cleanup requirements.