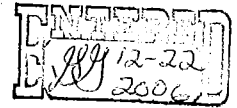




STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY



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

November 16, 2006

Mr. Carl North  
4203 Owen Way  
Anacortes, WA 98221

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

- Name: Carl North RV
- Address: 14027 Lake City Way NE, Seattle, WA 98052
- Facility/Site No.: 9816118
- VCP No.: NW 1652

Dear Mr. North:

Thank you for submitting your independent remedial action report for the Carl North RV 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. Focused Groundwater Investigation Report, Carl North RV, 14027 Lake City Way NE, Seattle, Washington prepared by Environmental Partners Inc dated April 18, 2005.

2. Groundwater Monitoring Report Second Quarter 2005, prepared by Environmental Partners Inc. dated June 21, 2005.
3. Groundwater Monitoring Report Third Quarter 2005, prepared by Environmental Partners Inc. dated October 19, 2005.
4. Groundwater Monitoring Report Fourth Quarter 2005, prepared by Environmental Partners Inc. dated June 9, 2006.

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 release of benzene in groundwater.

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 and the Leaking Underground Storage Tank (LUST) 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 Mr. Carl North.

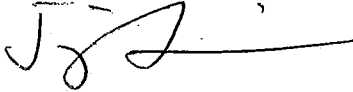
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void and further remedial action may be required at the Site.

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.

Mr. Carl North  
November 16, 2006  
Page 3

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 'Jing Liu', with a long horizontal stroke extending to the right.

Jing Liu  
NWRO Toxics Cleanup Program

## Cleanup/Decision Summary

Site Name: Carl North RV

FS ID #: 9816118

VCP #: NW1652

Site Decision (attach letters): No Further Action Determination

**1. Site Description (include site address with street, city, and county; physical description; current and historical uses of site; etc.):**

The site is located at 14027 Lake City Way NE in Seattle. It has been occupied by Carl North RV.

The general soil profile at the subject property consisted of either gravel or grass and topsoil at the surface underlain by intermittent intervals of silt, sand and gravel mixtures to a depth of between approximately 20 feet to 25 feet below ground surface. A silt layer was observed beneath. Depth to groundwater varies from 7 to 13 feet.

**2. Describe affected media (soil, groundwater, surface water, sediment, air):**

Soil was contaminated by gasoline range hydrocarbons and groundwater was contaminated by benzene. The source appeared to be leakage or spills from the USTs, which were associated with a former gasoline station located on the northern portion of the subject property.

**3. Cleanup method used:**

- ☒ Method A  
☐ Method B (Attempted to utilize Method B Worksheet)  
☐ Method C

**4. Describe cleanup activities (for each media) and if contamination remains on-site (including conformational sampling/analysis, points of compliance, etc...):**

The four USTs and associated petroleum contaminated soil were removed. Ecology issued a No Further Action determination for soil on June 12, 2003. On June 2, 2006, Ecology issued another opinion letter, Partial Sufficiency and Further Action Determination. The letter stated that Ecology has determined that the independent remedial action(s) conducted at the Site are sufficient to meet the MTCA requirements for characterizing and addressing the soil contamination caused by the release of gasoline hydrocarbons at the Site. However, further remedial action is necessary for the following reasons:

- Benzene in the groundwater above the state standards.
- Lack of active cleanup activity in the past 12 months.


Three groundwater monitoring wells were installed at the subject property in March 2005. However, the groundwater monitoring reports were not submitted to Ecology until July 2006 when the applicant resubmitted their VCP application. Four consecutive quarters of groundwater monitoring results showed compliance with the MTCA requirements.


5. Describe restrictive covenant (e.g., contamination remains under structure, groundwater restrictions, 5-year review):

N/A

6. Indicate if site to be delisted and EEOS contact (only for HSL sites):

N/A

 ES-3 11/16/06  
\_\_\_\_\_  
Signature, Title, and Date

 VCP Unit Supervisor 11/16/06  
\_\_\_\_\_  
Signature, Title, and Date

\_\_\_\_\_  
Signature, Title, and Date



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600  
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

June 2, 2006

MICHAEL LAM  
NOWICKI & ASSOCIATES INC  
33516 9<sup>TH</sup> AVENUE S BLDG 6  
FEDERAL WAY WA 98003

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

- Site Name: CARL NORTH COUNTRY CENTER
- Site Address: 14027 LAKE CITY WAY NE SEATTLE WA
- Facility/Site No.: 9816118
- VCP No.: NW0983

Dear: MR LAM

Thank you for submitting your independent remedial action report for the CARL NORTH COUNTRY CENTER 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. April 10, 2006 Notification of Pending Inactive Determination Status for the following Hazardous Waste Site enrolled in the Voluntary Cleanup Program by Ecology
2. May 30, 2006 Determination Status for the following Hazardous Waste Site enrolled in the Voluntary Cleanup Program by Ecology

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):

- Gasoline Hydrocarbons in the Soil
- Benzene in the Groundwater

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) 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 release(s) of:**

- Gasoline Hydrocarbons in the 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 release(s) of:**

- Benzene in the 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.

Further Action is required at this site for the following reasons:

- Benzene in the Groundwater above the state standards
- Lack of active cleanup activity in the past 12 months.

**This letter replaces Ecology's Interim NFA for soil only issued to this site on 7/22/03. Ecology's Interim NFA of 7/22/03 issued to this site is hereby rescinded.**

Identify & Terminate Inactive Sites  
Partial Sufficiency & Further Action Determination: Rescind Interim NFA  
VCP ID# NW0983  
June 2, 2006  
Page 3 of 3

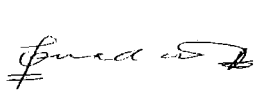
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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 performed at the Site meet those requirements.

If you have any questions you may reach me at (360) 407-7244.

Sincerely



Nnamdi Madakor, VCP Coordinator  
HQ - Toxic Cleanup Program

cc: Mark Edens, NWRO VCP Unit Manager.  
Dale Myers, NWRO Data Coordinator  
Trish Akana, Ecology (NW0983)

NM:nm

NOTE: This opinion letter constitutes a new form letter under which Ecology shall issue technical consultation and advice pursuant to WAC 173-340-515. This opinion letter changes certain terminology to more closely reflect MTCA and its implementing regulations. This opinion letter takes the place of, and is functionally equivalent to, the "interim" or "conditional" No Further Action (NFA) letters issued by Ecology in the past.



RESIDENTIAL

BRIGHTON APARTMENTS

USED AUTO SALES

TRAVEL  
AGENCY

RESIDENTIAL

EXXON  
GAS STATIONCOMMET  
AUTO  
BODYMOBIL  
ELECTRICUSED  
TIRESLAKE CITY  
PICTURE  
FRAMINGWALTS  
MUFFLER

RESIDENTIAL

RESIDENTIAL

RESIDENCE

WATERMILL  
POOL SUPPLIES  
SALES & SERVICE**LEGEND**

- APPROXIMATE PROPERTY BOUNDARY
- FENCE
- STORMWATER INLET
- D DUMPSTER
- ⊙ SEWAGE DUMP DRAIN
- ⊙ APPROXIMATE BORING LOCATION

**NOT TO SCALE****ENSR**

FIGURE 2

**BORING LOCATION MAP**

Carl North Recreation Vehicles  
14027 Lake City Way NE  
Seattle, WA 98125

DRAWN: M. SCOP  
FILE NO. 482-200A

DATE: 1/25/2000  
CHK BY:

PROJECT NO.  
5555-482-200

REV.