

Department of Ecology - Environmental Report Tracking System

ERTS # 606369

Department of Ecology - Environmental Report Tracking System

Initial Report

External Reference #

Caller Information

Where did it happen

First Last
 Name ANITA HICKLIN
 Business Name JEFFERSON COUNTY PUBLIC HEALTH
 Street Address 615 SHERIDAN STREET
 Other Address
 City PORT TOWNSEN State WA Zip
 E-mail AHICKLIN@CO.JEFFERSON.W Confidential_FL
 Phone Ext Type
 (360) 385-9405 Business

Berth Anchorage
 Location Name LEE'S TRUCK REPAIR
 Street Address 1520 CENTER RD
 Other Address
 City/Place CHIMACUM State WA Zip 98325
 County - Region JEFFERSON SWRO FS ID
 WIRA #
 Waterway Type
 Latitude Longitude
 Topo Quad 1:24:000 PORT TOWNSEND SOUTH
 Direction/Landmark (mile post, cross roads, township/range)

What happened

Spills Program Oil Spill? N

Incident Date Received Date 6/12/2008 8:35
 Medium SOIL
 Material PETROLEUM - OIL OTHER
 Quantity Unit
 Source COMMERCIAL
 Cause HUMAN FACTOR - INCOMPETENCE
 Incident Type
 Activity UNKNOWN
 Impact SOIL CONTAMINATION
 Vessel Name
 Hull Number

Primary Potentially Responsible Party Information

First Last
 Name LEE SHORT
 Business Name LEE'S TRUCK REPAIR
 Street Address 1520 CENTER RD
 Other Address
 City CHIMACUM State WA Zip
 Phone (360) 732-4781 Ext Type Business
 E-mail

Additional Contact Information

Name Phone Ext Type

More Information

-----Original Message-----
 From: SMTP@www.ecy.wa.gov [mailto:SMTP@www.ecy.wa.gov]
 Sent: Thursday, June 12, 2008 8:35 AM
 To: Smitherman, Opal (ECY); Mendez-Correa, Lorna (ECY); Baxter, Susan (ECY)
 Subject: Form results from http://www.ecy.wa.gov/programs/spills/forms/nerts_online/SWRO_nerts_online.html

 Caller_First_Name: Anita
 Caller_Last_Name: Hicklin
 Caller_Business_Name: Jefferson County Public Health
 Caller_Street_Address: 615 Sheridan Street
 Caller_Address_Other:
 Caller_City: Port Townsend
 Caller_State: WA
 Caller_Zip: 98368
 Caller_Homephone:
 Caller_workphone: 360-385-9405
 Caller_Email: ahicklin@co.jefferson.wa.us
 Caller_Confidential: No
 Reported_Incident_Date: 04/23/08

Department of Ecology - Environmental Report Tracking System

ERTS # 606369

Reported_Medium: Unknown
Reported_Material: Unknown
Reported_Other_Material:
Reported_Quantity:
Reported_Unit_of_Measure: Unknown
Reported_Source: Unknown
Reported_Cause: HUMAN FACTOR - INCOMPETENCE
Reported_Activity: Unknown
Reported_Impact: SOIL CONTAMINATION
Reported_Vessel_Name:
Reported_Vessel_Type: Unknown

Reported_More_Info: Lee's Truck Repair has several spots of darkened soil around the business. There are several buckets or other containers that are open to the environment. There are two used oil tanks that have the secondary containment with standing material. There are 55 gallon drums that are not labeled and improperly stored. There is a drain approximately 15 feet from the used storage tanks and it is unknown where the drain goes to. The drain has darkened soil around it.

Reported_Incident_NWROCounty: Jefferson
Reported_Incident_City: Chimacum
Incident_Location_Street_Add: 1520 Center Road, Chimacum, WA 98325
Reported_Incident_Waterway:
Reported_Waterway_Type: Unknown
Reported_Directions:

Reported_PRP_First_Name: Lee
Reported_PRP_Last_Name: Short
Reported_PRP_Business: Lee Short
Reported_PRP_Street_Address: 1520 Center Road
Reported_PRP_address2:
Reported_PRP_City: Chimacum,
Reported_PRP_State: WA
Reported_PRP_Zip: 98325
Reported_PRP_Phone: 360-732-4781
Reported_PRP_Phone_Type: BUSINESS

Reported_PRP_More_Info2: The employee that was spoken on the day of the site visit stated that his boss knew it was 'a matter of time' before someone noticed their storage practices.

Submit_Button: Submit

Entry Person SMITHERMAN, OPAL

Entry Date 6/12/2008

INITIAL INVESTIGATION FIELD REPORT



ERTS Number: 606369
Parcel #: 901233009
COUNTY: Jefferson

SITE INFORMATION

Site Name (e.g., Co. name over door): Lee's Truck Repair	Site Address (including City and Zip+4): 1520 Center Road Chimacum, WA 98325-9711	Site Phone: (360) 732-4781
Site Contact and Title: Lee Short : Owner	Site Contact Address (including City and Zip+4): 1520 Center Road Chimacum, WA 98325-9711	Site Contact Phone: (360) 732-4768
Site Owner: Lee Short : Owner	Site Owner Address (including City and Zip+4): 2081 West Valley Road Chimacum, WA 98325-9711	Site Owner Phone: (360) 732-4768
Site Owner Contact: Roger Mayhew: Owner's Son	Site Owner Contact Address (including City and Zip+4): 7313 155 th St. E. Puyallup, WA 98375	Owner Contact Phone: Cell: (253) 318-9644 (H) (360) 732-0081
Alternate Site Name(s):	Comments:	Is property > 10 acres? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Previous Site Owner(s):	Comments:	

Location: Quarter-Quarter: SW 1/4 Section: 23 Township: 29N Range: 1W
Latitude: Degrees: 47 Minutes: 59 Seconds: 21.2928"
Longitude: Degrees: 122 Minutes: 46 Seconds: 15.4992"

INSPECTION INFORMATION

Inspection Date: 1-20-09	Inspection Time: 14:30	Entry Notice: Announced <input type="checkbox"/> Unannounced <input checked="" type="checkbox"/>
Photographs Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Weather: Clear <input checked="" type="checkbox"/> Rain <input type="checkbox"/> Temperature: <u>36</u> °F	
Samples Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Wind Direction: none	Wind Speed:

RECOMMENDATION

No Further Action (Indicate NFA in box below):	LIST on ISIS (Indicate in box below):		
Release or threatened release does not pose a threat <input type="checkbox"/>	Site Hazard Assessment	<input checked="" type="checkbox"/>	X
No release or threatened release <input type="checkbox"/>	Interim Action	<input type="checkbox"/>	
Educational mailing <input type="checkbox"/>	Emergency Action	<input type="checkbox"/>	
Refer to program/agency (Name: _____) <input type="checkbox"/>	Independent Cleanup Action In progress	<input type="checkbox"/>	
Independent Cleanup Action Completed (i.e., contam, removed) <input type="checkbox"/>	Desires Voluntary Compliance Program	<input checked="" type="checkbox"/>	X

COMPLAINT (Brief Summary of ERTS): On 4-23-2008 Anita Hicklin of Jefferson County Public Health visited the site as part of the Local Source Control Program. She noted several areas of darkened soil around the business, several buckets of auto fluids and other containers open to the environment, two oil tanks with secondary containment with standing material, 55 gallon drums that were unlabeled and improperly stored, and a drain approximately 15 feet from the oil storage tanks that has darkened soil around it. It is unknown where the drain goes. The employee on site that day reported to A. Hicklin that his employer knew it was "a matter of time" before someone noticed their storage practices. Photos were obtained at this visit by Ms. Hicklin. This was called in to Ecology on 6-12-08.

SITE STATUS (Brief Summary of site condition(s) after investigation): Some independent clean-up of oily auto parts, batteries, etc had occurred since the original site visit of 4-23-08. However, there remain several large issues including but not limited to: intentional and continuous use of secondary containment barriers around oil tanks as settling ponds to separate water from oil, effectively making them the primary containment; and a heavily contaminated storm drain system that drains directly to a wetland/flood plain area along a Salmon-bearing stream.

Investigator: Marjorie Boyd, Jefferson County Public Health	Date Submitted: February 19, 2009
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OBSERVATIONS

Description: Lee Short has operated Lee's Truck Repair business continuously at this site since 1975. The repair business is located on a relatively flat one acre parcel along the west side of Center Road that sits above a wetlands area, Chimacum Valley. Mr. Short's property is approximately 760 feet from Chimacum Creek, a type-2 salmon bearing stream that runs through the valley, and is approximately 300 feet from a class 5 stream that feeds Chimacum Creek. The land below the repair shop is a short grassy slope with some blackberry brambles that flattens out into Chimacum Valley, a wetlands and peat bog with standing water during the winter months. Chimacum Valley is also a wintering area for Trumpeter Swans, which various states list as a threatened or endangered species.

On January 20, 2009 Anita Hicklin of Jefferson County Public Health and I conducted an unannounced Initial Investigation site visit. Lee Short was not initially at the shop when we first arrived. As we prepared to leave, Mr. Short arrived. We spoke and Mr. Short was very cooperative, showing us the oil collection area, explaining how it works, and pointing out to us where he thought the drain for his storm water system came out below his property. Part way into the site visit, Mr. Short let his son Roger Mayhew continue the visit with us as he had a service call he needed to attend to. The visit was completed with Mr. Mayhew.

Mr. Short primarily repairs trucks and large equipment. Activities at the repair shop include all aspects of automotive repair including welding, metal grinding, and parting out vehicles. Mr. Short states Safety Kleen collects and disposes of his solvents and cleaners, Pettit collects 2-3 gallons of antifreeze a month, and Interstate collects his batteries. He disposes of all manner of oils by collecting the fluids in buckets and pouring them into one of two large metal storage tanks.

The tanks are under a metal roof open on three sides. There is a low poured-cement retaining wall for secondary containment. This has several inches of standing used oil in it. Mr. Short poked his finger into it to illustrate his assertion that "most of it is water, the oil is just on top." However, his finger appeared to only scoop oil. "I guess I didn't realize it was so deep." Mr. Short states he drains water out the bottom of the main oil storage tank into the containment area. Oil floats to the top. There he lets it sit until "it grows thick", and he manually scoops off the oil with a bucket. It then sits in a second container until he drains the remaining water out into the containment area, and the remaining oil sludge is "thrown on a brush fire or something." The oil remaining in the large tank is pumped into a smaller tank (on bare dirt, no secondary containment), then pumped from there into a larger tank, with secondary containment. From there the oil is pumped into the repair shop and used as heating oil. The second large oil holding tank's secondary containment has some standing used oil and water in it as well.

Next to the two holding tanks is a cement pad with a drain in it. There is a large, dark, apparently oily stained area that extends approximately fifteen feet up-gradient from the drain, and two feet down-gradient from the drain where it hits a grassy area. The grass appears to have an oily "high-tide" mark on it. Mr. Short explained that the drain and a second one further up the hill drain directly into a 6 inch pipe, then out into field below the shop. There are no screens or filters to prevent contaminants from being released onto the ground. Lee Short states this has been in place for 30 years. During the visit there was a large piece of machinery (backhoe?) draining both a tan-colored and red fluid from below it directly onto the cement pad. The fluids were flowing towards the drain.

Inspection of the rest of the site revealed an open five gallon plastic bucket filled with an oily substance. It was sitting in open air, no protection from the weather. Mr. Short poked his finger in the liquid and there was an ice layer on top of the oil layer. The site also had oily engines sitting directly on the ground, uncovered, numerous dark oily patches on the ground, unlabeled 50 gallon drums with corroded lids which Mr. Short stated contained oil, 5-gallon plastic buckets that appeared to have formerly held automotive fluids now in the brambles down the embankment from the shop, junk vehicle hulks, and an occupied travel trailer not hooked up to any septic with a 6-inch plastic pipe that appears to drain liquid down an embankment.

The last action of the site visit was to obtain a soil sample from the area where the storm water drain deposits its effluent. Mr. Mayhew was present for the sampling. The weather was somewhat cloudy, no wind, approximately 36 degrees Fahrenheit. The sample was obtained at 15:20 from 2-4 inches below ground surface level. There was a strong odor to the soil of diesel/oil that was noted by AH, MIB, and Mr. Mayhew. The sample was placed in a sanitary 4 oz glass jar, sealed, and placed immediately in an iced cooler. We then left the site and drove back to JCPH where the sample was placed in a smaller cooler with ice, chain of custody form completed, and sample shipped at 16:30 by UPS to Analytical Resources Incorporated.

Description of past practices likely to be responsible for contamination: Improper handling and storage of used oil and other automotive fluids, improper storage of oily auto parts, and inadequate protection of storm-water drains from contamination with hazardous substances.

ACTIVITIES OR PRACTICES RESPONSIBLE FOR CONTAMINATION:		
Spill	<input checked="" type="checkbox"/>	LUST <input type="checkbox"/>
Pesticide disposal	<input type="checkbox"/>	Tank <input checked="" type="checkbox"/>
Landfill	<input type="checkbox"/>	Improper handling <input checked="" type="checkbox"/>
Drums	<input type="checkbox"/>	Improper disposal <input checked="" type="checkbox"/>
Other – Describe: Allowing oil to drain onto the ground and into a drain that deposits effluent directly onto a wetlands area.		
Are discharges permitted (if yes, describe): No <input checked="" type="checkbox"/> Yes <input type="checkbox"/>		Standard Industrial Code(s)

CONTAMINANT(S)

AFFECTED MEDIA	CONTAMINANTS (#1-16: See contaminants key) Enter letter designating status of contaminant: C = Confirmed (above cleanup levels); S = Suspected; R = Remediated															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Ground Water							S									
Surface Water							S									
Drinking Water																
Soil							C									
Sediment																
Air																

1 Base/neutral organics	7 Petroleum products	13 Corrosive wastes
2 Halogenated organic compounds	8 Phenolic compounds	14 Radioactive wastes
3 Metals - Priority pollutants	9 Non-halogenated solvents	15 Conventional contaminants, organic
4 Metals - Other	10 Dioxin	16 Conventional contaminants, inorganic
5 Polychlorinated biPhenyls (PCBs)	11 Polynuclear aromatic hydrocarbons (PAHs)	
6 Pesticides	12 Reactive wastes	

SITE INFORMATION

Soil type: Gravelly sandy loam on main part of site as well as short band of slope above valley floor. Valley below is "Semiahoo Muck" of 15" above a peat layer to 54".	Slope 3%
Site vegetation/cover present:	<input type="checkbox"/>
Forest <input type="checkbox"/>	<input type="checkbox"/>
Bare soil <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Brush <input type="checkbox"/>	<input type="checkbox"/>
Landscaped <input type="checkbox"/>	
Other – Describe: <u>Below site</u> is field and flood plain, wetlands, peat bog with year-round stream	

Are there any drinking water systems affected?	<input checked="" type="checkbox"/> Maybe	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Municipal, <u>private</u> , or both? (Circle one)			
How many people are estimated to be affected? 67 domestic wells x 3 = <u>201</u>			
Is there a potential for a release or threatened release to affect a drinking water source?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Are there monitoring wells in the vicinity?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Are there dry wells in the vicinity?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

CONTAMINANT PATHWAYS AND TARGETS

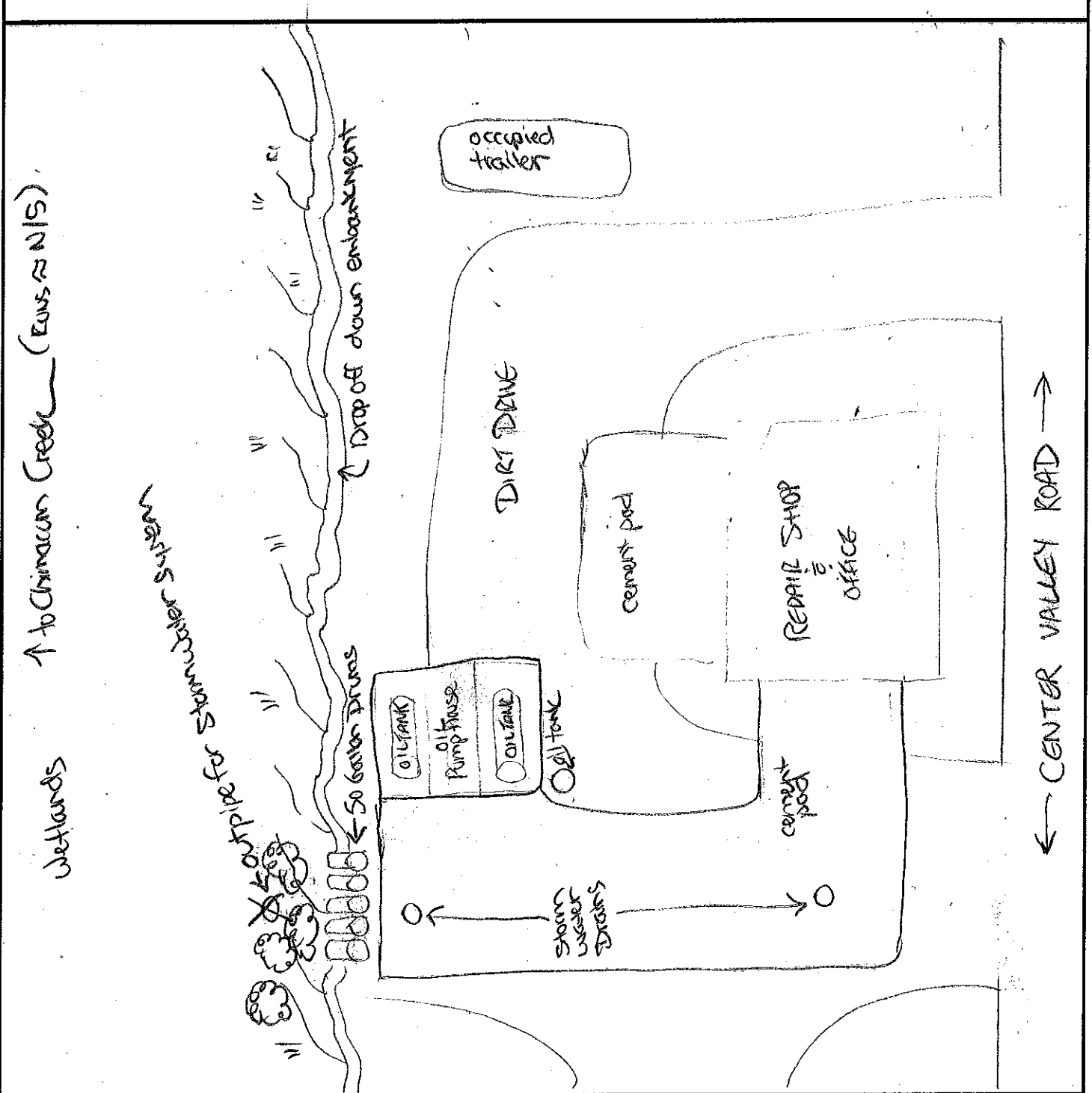
	Ingestion	Inhalation	Contact
Ground Water			X
Surface Water	X		X
Drinking Water	X		
Soil			X
Sediment			
Air			
Targets possible:		Residential	X
Human, adult	X	Industrial	<input type="checkbox"/>
Human, children	X	Commercial	X (salmon, ag. irrigation, food crops, cattle, hay,)

Sensitive environments (See WARM Scoring Manual for definition):
 Yes No If yes, describe: The area down-gradient from the site, where the storm water drain deposits its effluent, is a wetlands area that has standing water for much of the winter and Chimacum Creek, a class 2 salmon-bearing stream, runs through it. The repair shop is 760 feet from Chimacum Creek, and is approximately 300 feet from a class 5 stream that feeds Chimacum Creek. This section of Chimacum Valley is also a wintering site for Trumpeter Swans which several states list as an endangered or threatened species.

General Comments:

SITE MAP/DIAGRAM

Site Name: Lee's Truck Repair



↑
North

Approximate scale: _____ inch = _____ feet

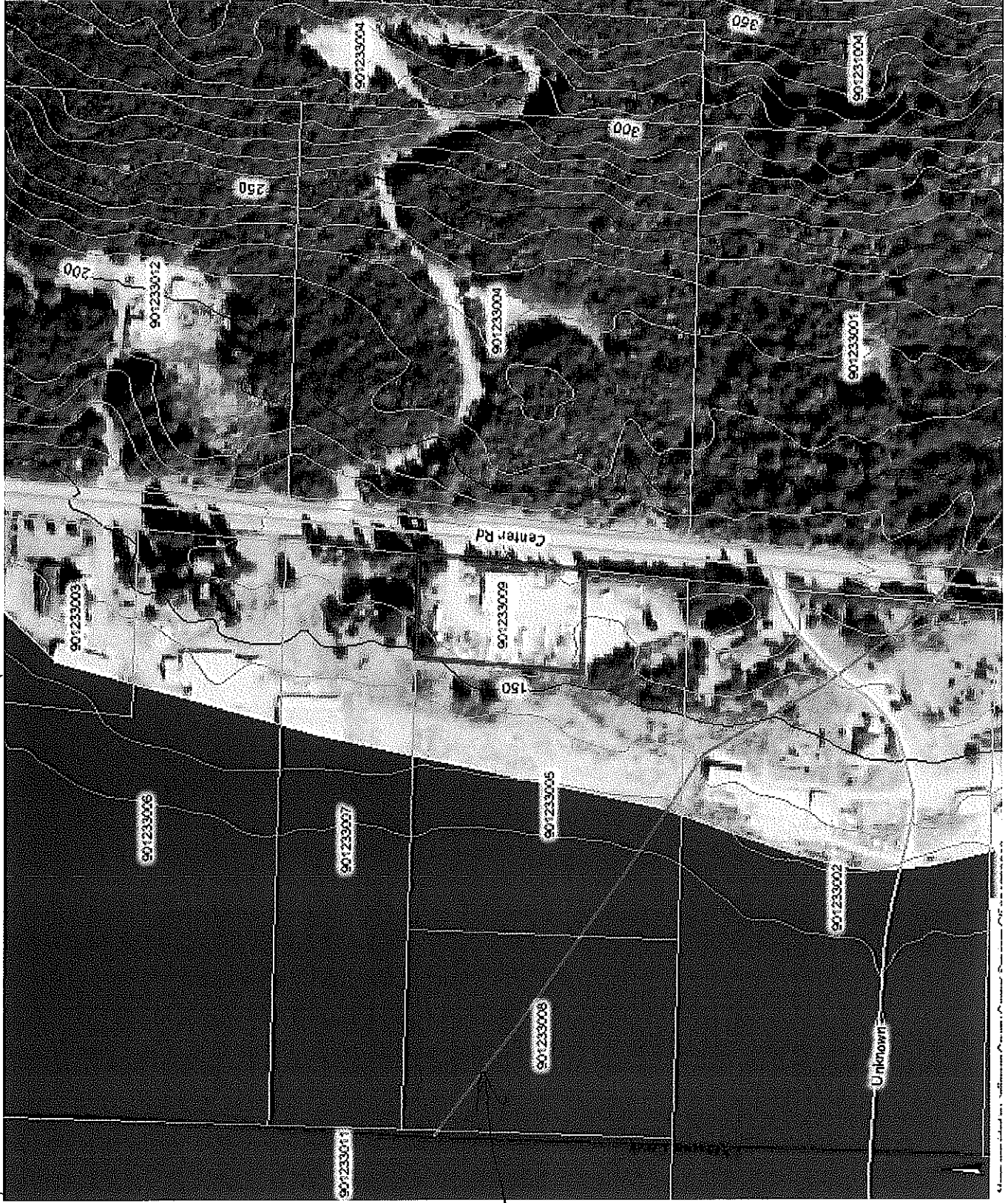
ERTS Number: 606369

County: Jefferson

Inspector: Marjorie Boyd, Jefferson County Public Health

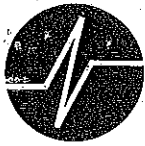
Date: 2-19-09

Chimacum Creek, Class 2 Stream
Wetlands



Class 2 Stream





Analytical Resources, Incorporated
Analytical Chemists and Consultants

February 2, 2009

Marjorie Boyd
Environmental Health Specialist
Jefferson County Public Health
615 Sheridan Street
Port Townsend, WA 98368

RE: Client Project: Lee Short Truck Repair
ARI Job No. OJ05

Dear Ms. Boyd:

Please find enclosed the original chain of custody documentation and final data report for samples from the project referenced above.

One sample was received in good condition on January 21, 2008. The sample was analyzed for NWTPH-Dx as requested on the COC. Analyses met all requirements for laboratory QC. Following guidance from WA Ecology, copies of the fuels chromatograms have been included in this report for your review.

An electronic copy of this report and all raw data will remain on file with ARI. Should you have any questions or problems, please feel free to contact me at your convenience.

Sincerely,

ANALYTICAL RESOURCES, INC.

Susan Dunnihoo
Director, Client Services
sue@arilabs.com
206-695-6207

Enclosures

cc: eFileRef OJ05

SD/sdrd

RECEIVED

FEB 09 2009

Jefferson County
Environmental Health



Cooler Receipt Form

ARI Client: Jefferson County Public Health Project Name: _____
 COC No: _____ Delivered by: UPS
 Assigned ARI Job No: 0505 Tracking No: _____

Preliminary Examination Phase:

Were intact, properly signed and dated custody seals attached to the outside of to cooler? YES NO
 Were custody papers included with the cooler? YES NO
 Were custody papers properly filled out (ink, signed, etc.) YES NO
 Record cooler temperature (recommended 2.0-6.0 °C for chemistry) 4.2 °C

Cooler Accepted by: Wm Date: 1/21/09 Time: 1120

Complete custody forms and attach all shipping documents

Log-In Phase:

Was a temperature blank included in the cooler? YES NO
 What kind of packing material was used? BW
 Was sufficient ice used (if appropriate)? YES NO
 Were all bottles sealed in individual plastic bags? YES NO
 Did all bottle arrive in good condition (unbroken)? YES NO
 Were all bottle labels complete and legible? YES NO
 Did all bottle labels and tags agree with custody papers? YES NO
 Were all bottles used correct for the requested analyses? YES NO
 Do any of the analyses (bottles) require preservation? (attach preservation checklist) YES NO
 Were all VOC vials free of air bubbles? INA YES NO
 Was sufficient amount of sample sent in each bottle? YES NO

Samples Logged by: Wm Date: 1/21/09 Time: 1215

**** Notify Project Manager of discrepancies or concerns ****

Explain discrepancies or negative responses:

RECEIVED

FEB 09 2009

Jefferson County
Environmental Health


By:

Date:

ORGANICS ANALYSIS DATA SHEET
TOTAL DIESEL RANGE HYDROCARBONS
NWTPHD by GC/FID
Page 1 of 1
Matrix: Soil

QC Report No: OJ05-Jefferson Cty Public Health
Project: LEE SHORT TRUCK REPAIR

Date Received: 01/21/09

Data Release Authorized: 
Reported: 01/29/09

ARI ID	Sample ID	Extraction Date	Analysis Date	EFV DL	Range	RL	Result
MB-012409 09-2193	Method Blank HC ID: ---	01/24/09	01/28/09 FID3A	1.00 1.0	Diesel Motor Oil o-Terphenyl	5.0 10	< 5.0 U < 10 U 82.7%
OJ05A 09-2193	LS-1 HC ID: DRO/MOTOR OIL	01/24/09	01/28/09 FID3A	1.00 100	Diesel Motor Oil o-Terphenyl	740 1,500	8,500 37,000 D

Reported in mg/kg (ppm)

EFV-Effective Final Volume in mL.
DL-Dilution of extract prior to analysis.
RL-Reporting limit.

Diesel quantitation on total peaks in the range from C12 to C24.
Motor Oil quantitation on total peaks in the range from C24 to C38.
HC ID: DRO/RRO indicates results of organics or additional hydrocarbons in ranges are not identifiable.

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FEB 09 2009

Jefferson County
Environmental Health

TPHD SURROGATE RECOVERY SUMMARY

Matrix: Soil

QC Report No: OJ05-Jefferson Cty Public Health
Project: LEE SHORT TRUCK REPAIR

<u>Client ID</u>	<u>OTER</u>	<u>TOT OUT</u>
012409MBS	82.7%	0
012409LCS	91.1%	0
LS-1	D	0

LCS/MB LIMITS QC LIMITS

(OTER) = o-Terphenyl

(52-121)

(48-119)

Prep Method: SW3546
Log Number Range: 09-2193 to 09-2193

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FEB 09 2009

Jefferson County
Environmental Health

ORGANICS ANALYSIS DATA SHEET
NWTPHD by GC/FID
Page 1 of 1

Sample ID: LCS-012409
LAB CONTROL

Lab Sample ID: LCS-012409
LIMS ID: 09-2193
Matrix: Soil
Data Release Authorized: *[Signature]*
Reported: 01/29/09

QC Report No: OJ05-Jefferson Cty Public Health
Project: LEE SHORT TRUCK REPAIR

Date Sampled: NA
Date Received: NA

Date Extracted: 01/24/09
Date Analyzed: 01/28/09 21:49
Instrument/Analyst: FID3A/PKC

Sample Amount: 10.0 g
Final Extract Volume: 1.0 mL
Dilution Factor: 1.00

Range	Lab Control	Spike Added	Recovery
Diesel	126	150	84.0%

TPHD Surrogate Recovery

o-Terphenyl	91.1%
-------------	-------

Results reported in mg/kg

RECEIVED

FEB 09 2009

Jefferson County
Environmental Health

TOTAL DIESEL RANGE HYDROCARBONS-EXTRACTION REPORT

Matrix: Soil
Date Received: 01/21/09

ARI Job: OJ05
Project: LEE SHORT TRUCK REPAIR

ARI ID	Client ID	Client Amt	Final Vol	Basis	Prep Date
09-2193-012409MB1	Method Blank	10.0 g	1.00 mL	-	01/24/09
09-2193-012409LCS1	Lab Control	10.0 g	1.00 mL	-	01/24/09
09-2193-OJ05A	LS-1	6.71 g	1.00 mL	D	01/24/09

RECEIVED

FEB 09 2009

Jefferson County
Environmental Health

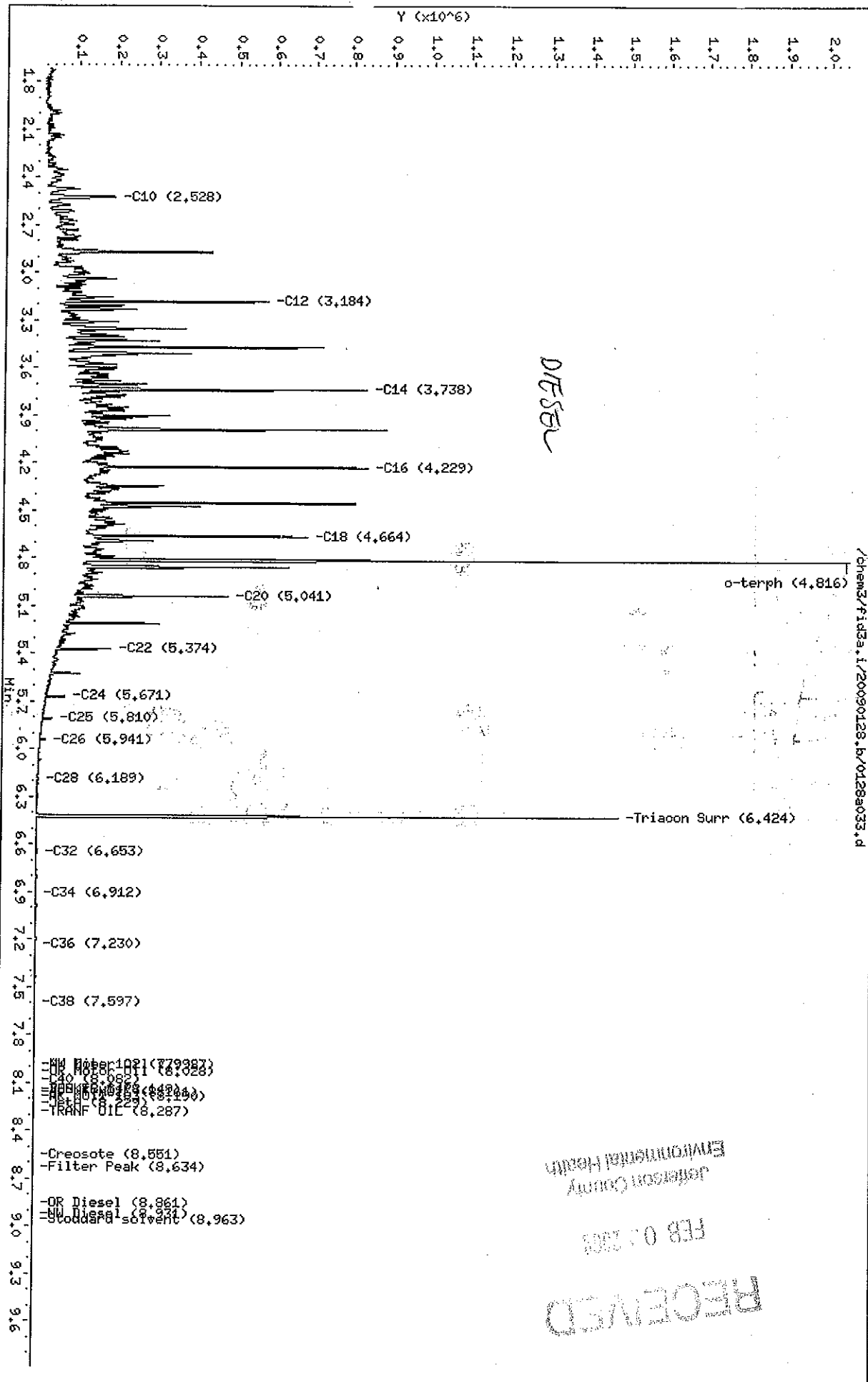
Basis: D=Dry Weight W=As Received
Diesel Extraction Report

Data File: /chem3/fl13a.i/20090128.b/0128a033.d
Date: 28-JAN-2009 21:49
Client ID: 0305LCSS4
Sample Info: 0305LCSS4

Column phase: ZBL-HT

/chem3/fl13a.i/20090128.b/0128a033.d

Instrument: fl13a.i
Operator: ms
Column diameter: 0.25



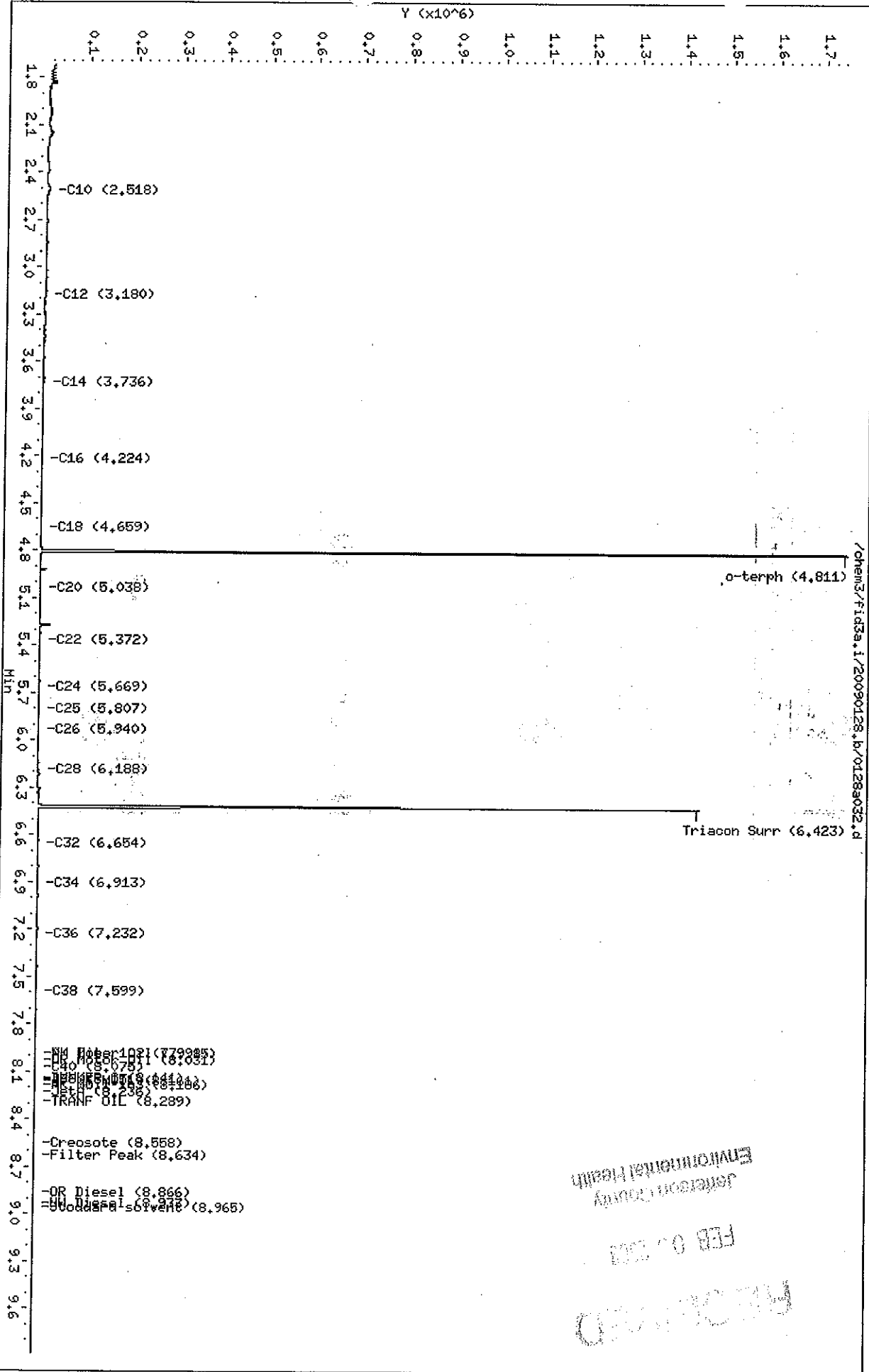
RECEIVED
FEB 03 2009
Jefferson County
Environmental Health

Data File: /chem3/fid3a.i/20090128.b/0128a032.d
Date: 28-JAN-2009 21:30
Client ID: 0305HBS1
Sample Info: 0305HBS1

Column Phase: ZBL-HT

Instrument: fid3a.i

Operator: ms
Column diameter: 0.25



Jackson County
Environmental Health
FEB 03 2009
RECEIVED

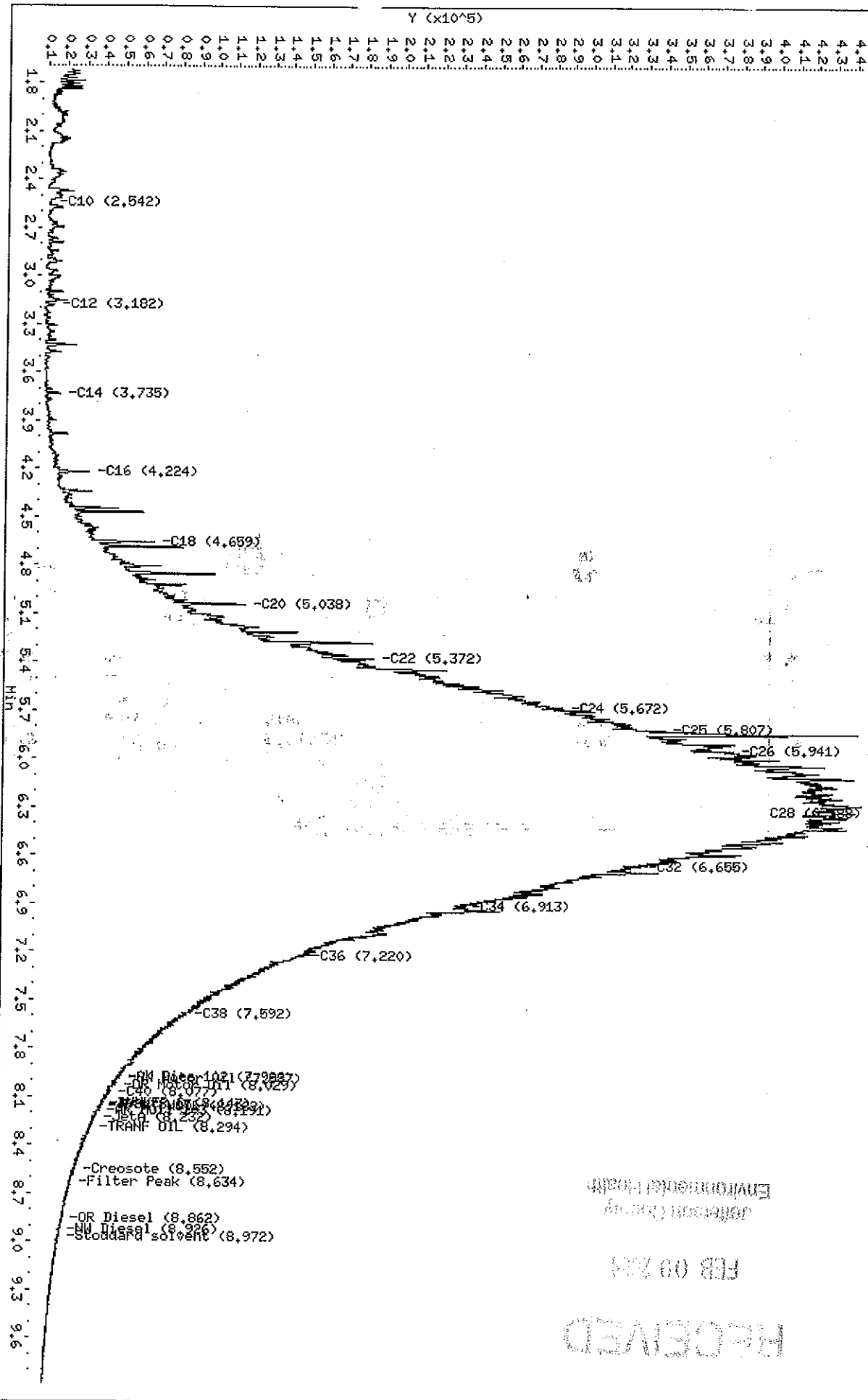
Data File: /chem3/fid3a.i/20090128.b/0128a034.d
 Date: 28-JAN-2009 22:07
 Client ID: LS-1
 Sample Info: 0J05A.100

Column phase: ZBL-HT

/chem3/fid3a.i/20090128.b/0128a034.d

Instrument: fid3a.i

Operator: ms
 Column diameter: 0.25



RECEIVED
 FEB 09 2009
 Jefferson County
 Environmental Health



JEFFERSON COUNTY PUBLIC HEALTH

615 Sheridan Street • Port Townsend • Washington • 98368
www.jeffersoncountypublichealth.org

February 20, 2009

Mr. Lee Short
1520 Center Road
Chimacum, WA 98325

Reference: Initial Investigation of Potential Soil Contamination
Parcel Number: 901233009
ERTS #: 606369

Dear Mr. Short,

This letter is to follow up my site visit of January 20, 2009. As I explained during our visit, part of the investigation process is to obtain soil and or water samples to determine if contamination exists, and, if it does, is it to the extent that clean-up needs to be done. What determines the legal need for clean-up is the Model Toxics Control Act (MCTA), federal legislation that sets levels for different contaminants below which clean-up may be optional, above which clean-up is mandatory.

During the January 20th site visit, only one soil sample was obtained. Sampling during an Initial Investigation is not meant to be comprehensive, or to determine every contaminant that may be present, or how far it may extend. It is just to see if there is something that warrants further investigation or action.

The one soil sample was taken from below where the storm-water drain empties out into the field below your oil recycling area. The top two inches of soil were scraped away, to make sure there was not just some surface contamination. The sample sent to the lab was taken from below two inches below ground surface level. The sample was then mailed to an Ecology-certified lab and tested for hydrocarbons, the most likely contaminant.

The MCTA level for diesel is 2000 mg/kg. The sample shows 8,5000 mg/kg.
The MCTA level for motor oil is 2000 mg/kg. The sample shows 37,000 mg/kg.

COMMUNITY HEALTH
DEVELOPMENTAL DISABILITIES
MAIN: 360-385-9400
FAX: 360-385-9401

PUBLIC HEALTH
ALWAYS WORKING FOR A SAFER AND
HEALTHIER COMMUNITY

ENVIRONMENTAL HEALTH
NATURAL RESOURCES
MAIN: 360-385-9444
FAX: 360-385-9401

This means the diesel contamination in the soil tested is four times greater than the federally mandated clean-up level, and the motor oil is fifteen times greater than the mandated clean-up level.

The next step is to figure out the scope and extent of what needs to be cleaned-up. There may be other contaminants present that we did not test for, and it is not known how far the contamination extends.

I spoke with your son Roger by phone when I called to give you the results. He indicated that you are interested in the Voluntary Clean-up Program through Ecology. In this program, property owners consult with Ecology about what needs to be cleaned-up, and how. The property owners then do the clean-up themselves, saving themselves money and avoiding becoming a listed hazardous waste site.

Information about the program and all the necessary forms is available on the internet, but as Roger says he and you are not comfortable with computers, I am sending along the forms you will need. I would also suggest you speak directly with Scott Rose, coordinator of Ecology's Voluntary Clean-up Program. His telephone number is (360) 407-6347. He is very nice and very helpful. Other Jefferson County businesses have gone through this program, including Bill's Garage at the Chimacum intersection.

In summary, there is contamination that needs to be cleaned up. It is unclear if there are other contaminants or how far the contamination extends. The next step for you, if you are interested in doing the clean-up yourself (or hiring your own contractor), is for you to contact Scott Rose at Ecology and complete the forms to enter the VCP. They will likely have you hire a company to do further testing to see if there are other contaminants, other areas that need to be cleaned-up, and to determine how much of the area below the drain pipe needs to be excavated and how deep.

In the meantime, further contamination must be prevented. This includes the measures outlined in my letter of 1-29-09.

The issue of the occupied trailer with no septic and the solid waste accumulated around it, is a separate matter and was addressed in the Notice and Order to Correct Violation (NOCV) letter of February 2, 2009.

The Initial Investigation report has been forwarded to Ecology. They will send you a letter explaining your options as well. If you have any questions, you may call me at 379-4480. This is my direct line.

Thank you for you cooperation and prompt attention to this matter.

Sincerely,

Marjorie Boyd
Environmental Health Specialist
Jefferson County Public Health

Cc: Roger Mayhew
File





JEFFERSON COUNTY PUBLIC HEALTH

615 Sheridan Street • Port Townsend • Washington • 98368
www.jeffersoncountypublichealth.org

January 29, 2009

Mr. Lee Short
1520 Center Road
Chimacum, WA 98325

Regarding: Site visit of January 20, 2009

Dear Mr. Short,

This letter is to follow up my site visit of January 20, 2009. First, thank you very much for taking time out from your work day to speak with Anita Hicklin and me. I know you still had a service call to make, so we finished up the visit with your son Roger. We were running late so I did not get a chance to say goodbye and let you know what the next steps are and I hope to do that now with this letter.

As I explained during the visit, when Washington State Department of Ecology (Ecology) receives a complaint (e.g. about oil contamination or the improper handling of hazardous materials such as automotive fluids), these are referred to the local health department for investigation. This is called an Initial Investigation. It involves speaking with the owner and other people with knowledge of what is happening at the site, a site visit, obtaining photographs, and gathering soil and/or water samples to help evaluate if there is the need to investigate further, or if the complaint can be closed.

After finishing the tour of the property with Roger, I would say there are several areas of concern:

1. The two storm water drains that appear to be dispersing contaminated water out into the wetlands below your shop.
2. The use of the secondary containment barriers around your recycled oil tanks as a settling pool for oil/water, thus making them the primary containment system.
3. Open containers and improperly stored containers of waste oil.
4. Multiple areas of contaminated soil that appear due to improper handling of waste oil, transmission fluid, etc.
5. The occupied travel trailer that has a sewer pipe draining directly onto the ground and the solid waste that is piled up around the trailer.

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There are some relatively easy and inexpensive things that can and should be done immediately to address most of the issues. The possible soil contamination from the storm drains would likely be more involved.

1. Storm drains

- a. Care must be taken immediately to make sure no contaminants continue to enter the storm drains
- b. Oil-absorbent booms should be placed around the drain opening next to the oil recycling tanks to prevent the entrance of contaminants. An oil absorbent pad should be placed in/around the drain opening nearest the shop (a boom might not be feasible in this location). The absorbent booms/pads should be replaced frequently. This should be maintained until a different system is in place. You will need to speak with Ecology about what systems are acceptable.
- c. Oil, hydraulic fluid, anti-freeze and other automotive fluids must not be allowed to drain onto the ground.

2. Secondary containment areas for oil tanks

- a. All fluids must be removed from the secondary containment areas for the oil tanks. These areas are for emergency containment and must be kept empty of oil and water. If you desire to drain off water from the bottom of tanks, this can be done into a smaller container.
- b. If rain blowing in is a problem, you may want to consider additional rain protection for the tank shelter areas.

3. Open containers

- a. Automotive fluids must not be stored or allowed to sit in open containers. Materials must be stored in closed containers with tightly fastened lids.

4. Spills and contaminated soil

- a. If spills occur, they must be cleaned up immediately. Businesses should have appropriate absorbent equipment on hand to respond to spills quickly. All employees should know where the spill response materials are kept and how to use them.
- b. Contaminated soil and clean-up materials must be disposed of properly. Sludge oil must not be used to throw on brush fires. This is illegal. Petit may dispose of this for you.
- c. Contaminated soil can be taken to:

Petroleum Reclaiming Services in Fife

Jay Johnson (253) 383-4175 is the main contact.

PLEASE give a courtesy call first so Jay can speak with you and make arrangements. Accepted materials include contaminated soil, rags, PPE, booms, etc. There are very specific rules for transporting materials. Jay will explain these.

- d. Oily engines and parts should not be stored directly on soil. They need to be protected from the weather (so rain does not wash oil onto the ground) and stored on an impermeable surface to keep oil and other fluids from contaminating the ground.

5. Septic and solid waste violations

- a. The trailer next to your shop must immediately be vacated until it is hooked up to a legal septic system. It is not sufficient that the occupant(s) use the facilities inside your shop.
- b. The septic pipe draining from the trailer to the ground must be disconnected. No graywater or septage can be discharged onto the ground.
- c. The junk vehicles, piles of parts and scrap metal, garbage, cans and recycling, and discarded commodities surrounding the trailer must be cleaned up and disposed of properly.
- d. I will send you a separate letter concerning the above septic and solid waste violations that includes definitions and the parts of the law that are pertinent. It will give a thirty day deadline for compliance. A copy will be sent to your son Scott as well. Both the tenant and landowner are legally responsible for the proper disposal of septic and solid waste.

When the results from the soil sample taken 1-20-09 are known, I will mail you a copy and then we can discuss what the next steps are. In general, if the soil shows contamination above a certain level (Model Toxics Control Act- MCTA levels) then the next step would be to decide whether you want to clean the property up yourself or have Ecology do it.

It is much less expensive for property owners to clean up themselves or even to hire a company themselves. If you want to handle the clean-up, then you would contact Ecology and enter the Voluntary Clean-up Program (VCP). They would discuss with you what needs to be cleaned up and how. Usually they have you hire an independent company to test soil and water to determine the area that needs to be cleaned-up. Then they would develop a plan with you for your property.

If you do not enter the VCP, then a Site Hazard Assessment (SHA) will be performed. An SHA is a more detailed investigation than the Initial Investigation, and the contamination is evaluated for how much it is likely to impact human health and the environment. A site is then ranked, relative to other known sites in the state, on a scale of 1 to 5. (1 being the worst, 5 the least). Sites remain on the state's "Confirmed or Suspected Contaminated Sites List" until the site is cleaned-up by Ecology or the Property owner.

If the soil sample from 1-20-09 comes back below MCTA, then we can discuss ways to keep further contamination from occurring. I will go through this with you again when the results are known, I just wanted to give you an idea of what to expect.

In the meantime, you need to address issues 1-5 above.

If you have any questions, please do not hesitate to call me. My direct telephone number is 379-4480. If you need junk vehicle affidavits, I can provide those as well.

Thank you very much for your cooperation.

Sincerely,

Marjorie Boyd
Environmental Health Specialist
Jefferson County Public Health

Cc: Roger Mayhew
File