



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

April 30, 2009

Mr. Paul Grabau  
1201 Cornwall Avenue, Suite 105  
Bellingham, WA 98225

Dear Mr. Grabau:

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

- Name: Whidbey Marine & Auto Supply
- Address: 1689 Main St., Freeland, WA 98249
- Facility/Site No.: 17222251
- VCP No.: NW 1529

Thank you for submitting documents regarding your proposed remedial action for the Whidbey Marine & Auto Supply facility (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(s) at the Site:

- Gasoline-range petroleum hydrocarbons in Soil and Ground Water

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 your proposed remedial action(s):

1. December 5, 2008, *Cleanup Action Progress Report December 2008, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting



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2. June 18, 2008, *Cleanup Action Progress Report May 2008, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting
3. March 10, 2008, *Cleanup Action Progress Report February 2008, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting
4. September 13, 2007, *Cleanup Action Progress Report July 2007, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting
5. July 2, 2007, *Cleanup Action Progress Report April 2007, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting
6. March 12, 2007, *Cleanup Action Progress Report January 2007, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting
7. December 5, 2006, *Cleanup Action Progress Report November 2006, Whidbey Marine & Auto Supply Facility*, report by Farallon Consulting
8. October 26, 2006, *Cleanup Action Progress Report, Whidbey Marine & Auto Supply*, report by Farallon Consulting
9. February 10, 2006, *Site Characterization Report, Whidbey Marine & Auto Supply*, report by Farallon Consulting

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, Sally Perkins, at 425 649-9190.

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

- Gasoline-range petroleum hydrocarbons in Soil and Ground Water

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 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:**

- Additional investigation is necessary to determine the extent of soil contamination
- Additional investigation is necessary to determine the extent of ground water contamination in the perched zone and the potential for impact to the regional aquifer.

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- A Remedial Investigation document summarizing and interpreting all of the data needs to be prepared per MTCA requirements.
- A Feasibility Study and final Cleanup Action Plan need to be prepared per MTCA requirements.

**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.

If you have any questions regarding this opinion, please contact me at 425 649-7107.

Sincerely,



Mark Adams  
NWRO Toxics Cleanup Program

ma/kp

Enclosures: A

cc:

Delores Mitchell, VCP Financial Manager (without enclosures)

## Site Definition and Description

### Whidbey Marine and Auto Supply

The Site is defined as an area of contaminated soil and ground water associated with underground storage tanks (USTs) at the Whidbey Marine and Auto Supply (the Property). The full extent of the Site has not been determined, but contamination has been tracked at least as far as the adjoining property to the west.

The Property is located on Whidbey Island at 1689 Main Street in Freeland, Washington, and is situated within the central business area of this small rural town. Other commercial and retail businesses are located along Main Street, and are backed by a mix of open space and homes.

The Property has been used for some unknown length of time as a gas station, auto supply store, and repair facility. Ecology understands the gas station ceased operation sometime in 2008. There are currently three USTs at the southeast corner of the station Property. These three USTs reportedly replaced three older tanks in 1986.

The Site and surrounding area are located on the eastern edge of a smooth broad valley that slopes downward from the central portion of Whidbey Island to the marine waters of Holmes Harbor. The valley is drained by an apparent seasonal stream, which is about ¼ mile from the Site at its' closest point.

The land surface at the Site is about 115 feet elevation, and is nearly flat. However, the edge of the valley mentioned above begins within about 100 feet of the Site.

Geologic conditions beneath the Site consist of about 50 feet of glacial outwash sand overlying a 2 to 5 foot-thick silt layer. Additional sand deposits occur beneath the silt, extending to the depth explored, about 125 feet.

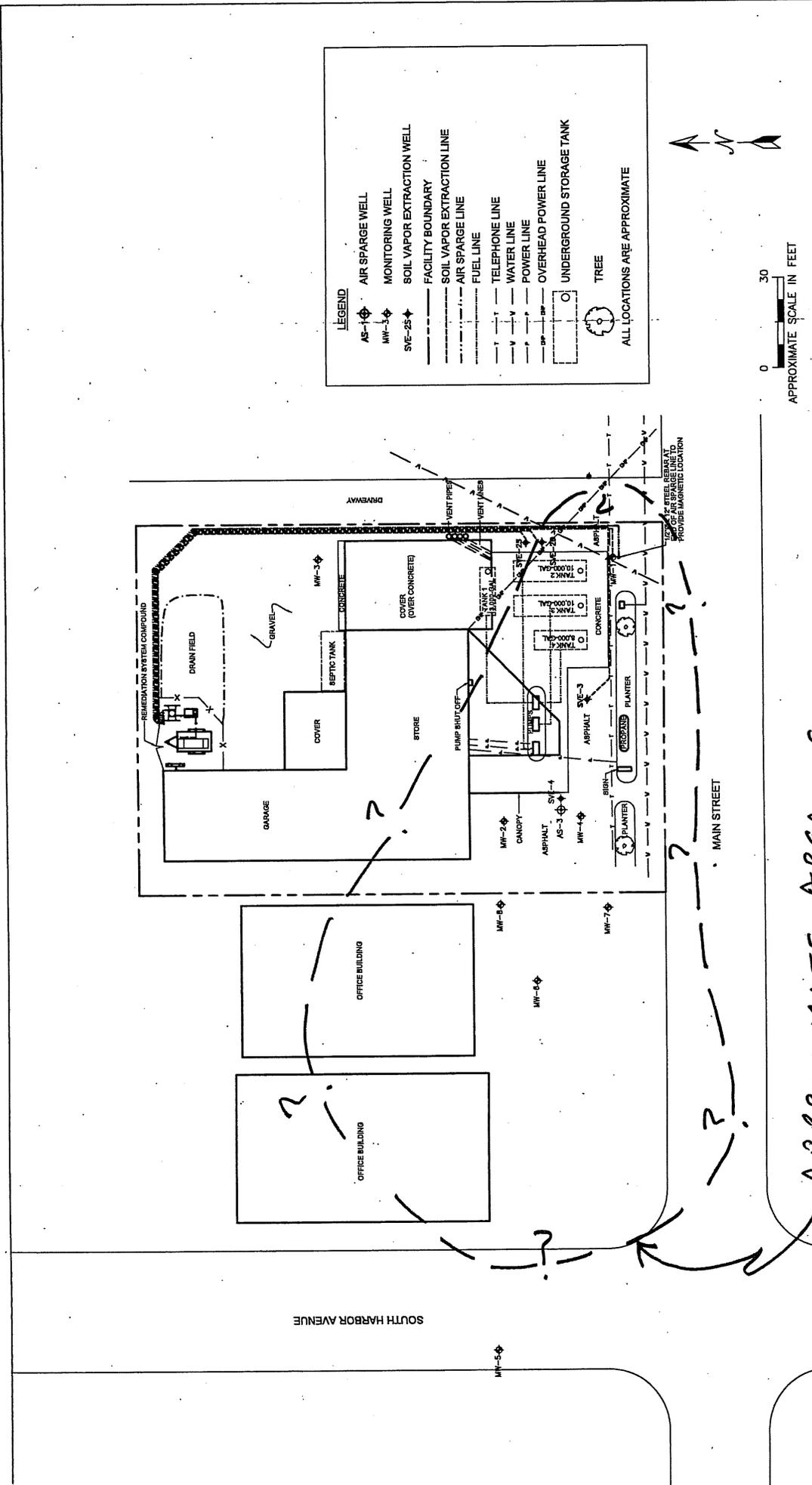
Perched ground water occurs perched on top of the silt (perched zone). The saturated thickness of the perched zone is only a few feet, and ground water in it flows to the west. The hydraulic gradient steepens dramatically just off-Property, indicating the possibility of discharge into the underlying sand.

Ground water also occurs in the deeper sand under water table conditions (the regional aquifer). The water table is about 115 feet below land surface. Flow directions in the regional aquifer are not known, but are likely northerly towards Holmes Harbor.

Soils contaminated with gasoline-range hydrocarbons occur below the service station tank nest, and extend down to the perched zone. The extent of the contaminated soils has not been determined. Ground water in the perched zone is also contaminated with gasoline-range hydrocarbons. This contaminated water is moving westward, off the Property. Total gasoline concentrations of up to 120 mg/L remain in ground water as of the last sampling event (September, 2008).

The data collected to date has not shown gasoline contamination to have penetrated the perched zone and reached the underlying regional aquifer. However, the data are insufficient to resolve this potential threat, and additional investigations are planned.

Remediation work began at the Site in 2006 with the installation and operation of a soil vapor extraction system. The extraction system is still in operation and currently extracts from four vapor wells completed in soil below the tank nest. The effluent is treated via catalytic oxidation. An estimated 11,800 pounds of gasoline have been removed from the subsurface as of October 2008.



APPROXIMATE AREA OF  
MICA SITE

