STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

August 14, 2019

Carl Ice
President & Chief Executive Officer
BNSF Railway Company
c/o CT Corporation System
711 Capitol Way S, Ste 204
Olympia, WA 98501

Subject: **Site Hazard Assessment – Time Oil Bulk Terminal**
Ecology FS ID: 75486194 / CS ID: 14604

Dear Carl Ice:

The Washington State Department of Ecology (Ecology) plans to conduct a site hazard assessment (SHA) of Time Oil Bulk Terminal, 2737, 2750, 2800, and 2805 W Commodore Way, Seattle, WA 98199, under the Model Toxics Control Act (MTCA), Chapter 173-340-320 WAC. This site has been on Ecology's Confirmed and Suspected Contaminated Sites List (CSCSL) since 1991. Kim Wooten will be the Ecology lead for this assessment.

The purpose of an SHA is to gather information on past and present waste management activities and other basic site-specific environmental data in order to assess the site for its potential or actual environmental hazard. These threats to human health and the environment are evaluated for each applicable contaminant migration route, resulting in a hazard ranking determination.

Sites are ranked on a scale of one (1) to five (5); 1 representing the highest level of concern, and 5 the lowest, relative to other assessed/ranked sites in the state. Ranked sites are placed on the state Hazardous Sites List (HSL). Or the assessment may determine that no further action is warranted, and the site removed from Ecology's CSCSL.

In addition to any required fieldwork, a review of current Ecology regional office files will be considered in site scoring. The next step in this assessment process will be to determine if any new site-specific information is available from the site owner/operator.

Additional data could include any environmental assessments or laboratory analyses that have been conducted regarding this site and not previously submitted to Ecology. If you have better information or comments on the existing data, please contact us as soon as possible. If no additional information is received by Ecology, we will proceed with our assessment. The final site rank and eventual site priority will be based primarily on the information used in the scoring.

Fact sheets describing Site Hazard Assessments, the Washington Ranking Method used in the assessment process and the Hazardous Sites List are enclosed for your information, as well as a copy of the Integrated Site Information System data summary sheet for this site. If you have questions, please contact Kim Wooten at (425) 649-7040 / kim.wooten@ecy.wa.gov.

Sincerely,

Donna Musa
Site Hazard Assessments
Toxics Cleanup Program

Enclosures

cc: TOC Holdings Co c/o Edmund Wood, Wood & Jones PS
TOC Holdings Co c/o Deborah Crabbe, Foster Garvey
Shane DeGross, BNSF Railway Corporation
Cantera Development Group, LLC c/o Bill Joyce, Joyce Ziker Parkinson PLLC

E-cc: Allyson Bazan, Assistant Attorney General, Ecology Division
Mark Adams, Ecology
Kim Wooten, Ecology

Cleanup Site Details

Cleanup Site ID: 14604

Cleanup Site ID: 14604 **Facility/Site ID:** 75486194 **UST ID:** 4055 Site Page | Site Documents | View Map

Cleanup Site Name: Time Oil Bulk Terminal Glossary

Alternate Names: Time Oil Bulk Terminal, Time Oil Bulk Terminal PPA, TIME OIL CO 228, Time Oil Co Seattle Terminal, TIME OIL CO SERVICE TANKS, TIME OIL SEATTLE, TOC HOLDINGS CO

LOCATION

Address: 2737 W COMMODORE WAY **City:** SEATTLE **Zip Code:** 98199 **County:** King

Latitude: 47.66205 **Longitude:** -122.39280 **WRIA:** 8 **Legislative District:** 36 **Congressional District:** 7 **TRS:** 25N 3E 11

DETAIL

Status: Cleanup Started **NFA Received?** No **Is PSI site?** No

Statute: MTCA **NFA Date:** N/A **Current VCP?** Yes **Past VCP?** Yes

Site Rank: N/A **NFA Reason:** N/A **Brownfield?** No

Site Manager: Adams, Mark **Responsible Unit:** Northwest **Active Institutional Control?** No

CLEANUP UNITS

Cleanup Unit Name	Unit Type	Unit Status	Resp Unit	Unit Manager	Current Process
Time Oil Bulk Terminal	Upland	Cleanup Started	NW	Adams, Mark	Voluntary Cleanup Program

ACTIVE INSTITUTIONAL CONTROLS

Instrument Type	Restriction Media	Restrictions/Requirements	Date	Recording Number	Recording County	Tax Parcel
There are no current Institutional Controls in effect for this site.						

AFFECTED MEDIA & CONTAMINANTS

	MEDIA					
Contaminant	**Soil**	**Groundwater**	**Surface Water**	**Sediment**	**Air**	**Bedrock**
Arsenic	C	C				
Benzene	C	C				
Dioxin/Dibenzofuran Compounds	C					
Other Non-Halogenated Organics	C	C				
Petroleum-Diesel	C	C				
Petroleum-Gasoline	C	C				

Key:
B - Below Cleanup Level
C - Confirmed Above Cleanup Level
RA - Remediated-Above
S - Suspected
R - Remediated
RB - Remediated-Below

SITE ACTIVITIES

Activity	Status	Start Date	End Date/ Completion Date
Site Discovery/Release Report Received	Completed		7/5/2018
VCP Receipt of Plan or Report	Completed		7/5/2018
VCP Opinion on Site Cleanup Plan	Completed	2/6/2019	2/28/2019
VCP Opinion on Remedial Investigation Work Plan	Completed	3/6/2019	4/8/2019

Cleanup Site Details

Cleanup Site ID: 14604

SITE ACTIVITIES

Activity	Status	Start Date	End Date/ Completion Date
Order/Decree/Amendment	In Process	4/1/2019	
Order/Decree/Amendment	In Process	4/1/2019	
Site Hazard Assessment/Federal Site Inspection	Planned	8/14/2019	12/31/2019

Site Hazardous Assessment is a First Step

Under the Model Toxics Control Act, one of the first steps in the process for cleaning up a hazardous waste site is a Site Hazard Assessment (SHA). During a site hazard assessment, the Department of Ecology collects environmental data about a site to determine the type and extent of contamination. If further action is needed, Ecology ranks the site using the Washington Ranking Method (WARM) and places it on the *Hazardous Sites List*.

Assessing the Potential Hazard

A site hazard assessment provides preliminary data regarding the potential hazard of a site. The main purpose of a site hazard assessment is to provide sufficient sampling data and other information to:

- Confirm or rule out contamination
- Identify the hazardous substance(s)
- Identify environmental characteristics associated with the site
- Evaluate the potential threats to human health and the environment

In addition, the site hazard assessment provides enough information to allow Ecology to rank the site's potential hazard relative to other sites on the *Hazardous Sites List*. This helps Ecology determine which sites should be worked on first. It is important to note that a hazard assessment is not intended to be a detailed site study or assessment of the health risk posed by a site.

Is a Site Hazard Assessment Always Necessary?

No, for a variety of reasons, a site hazard assessment may not always be necessary at a site. For example, sites doing independent cleanups and requesting Ecology consultation under the voluntary cleanup program would not normally need a site hazard assessment. In general, Ecology will conduct a site hazard assessment on sites that are anticipated to require significant future staff resources, since the assessment helps in setting workload priorities.

What Information Is Needed To Accurately Assess a Site?

Although a site hazard assessment is not intended to be a detailed site characterization, it includes sampling results from various locations on and around the site, site observations, maps and historical information. Specifically, a site hazard assessment should include:

1. Evidence confirming a release or threatened release of a hazardous substance.
2. Identification of the hazardous substances and their location, including what was or may be released and, if applicable, what products of decomposition, recombination or chemical reaction are currently present at the site.
3. A description of the facilities containing the substances and their condition.
4. Consideration of surface water run-on or run-off and the possibility of contaminants seeping through the surface and contaminating ground water.

5. Characterization of sub-surface and ground water, including the depth to ground water and distance to nearby wells, bodies of surface water and drinking water supplies.
6. An evaluation of human population, food crops, recreation areas, sensitive environments, irrigated areas and aquatic resources.
7. Any other factors which may be significant in estimating exposure of sensitive environments to hazardous waste.

What Happens After the Hazard Assessment?

The environmental information collected through the site hazard assessment process is used to "score" the primary exposure routes through which contaminants could pose a risk to human health and the environment. These include surface water, air and ground water. Each exposure route is then evaluated to determine the relative risk at each site and the final ranking for each site. Sites are ranked on a scale of 1 to 5 using the Washington Ranking Method, with a ranking of 1 representing the highest level of potential risk and 5 the lowest. The rankings represent an estimation of the potential threat posed by a site compared to all other assessed/ranked sites in the state.

Ecology will provide results from the site hazard assessment to site owners, operators and other potentially liable persons. If the department determines, after the assessment, that no further action is required at the site, it will notify the public through Ecology's *Site Register*.

How Can I Get More Information?

If you are interested in finding out more about a specific site or to find out which sites in your area will be assessed in the near future, call the regional office in which the site is located:

Central Region (*Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima*)	15 West Yakima Ave, Suite 200 Yakima WA 98902-3452	509/575-2490
Eastern Region (*Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman)*	N. 4601 Monroe, Suite 100 Spokane WA 99205-1295	509/329-3400
Northwest Region *(Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom*)	3190 160th Ave SE Bellevue WA 98008-5452	425/649-7000
Southwest Region (*Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Lewis, Mason, Pacific, Pierce, Skamania, Thurston, Wahkiakum*)	P O Box 47775 Olympia WA 98504-7775	360/407-6300

For additional information on the Site Hazard Assessment/WARM Ranking process, or to receive the Site Register, contact: Department of Ecology, Toxics Cleanup Program, P. O. Box 47600, Olympia WA 98504-7600. Or call 360/407-7170 or visit the Ecology website at: www.ecy.wa.gov and click on *Programs* then *Toxics Cleanup*. For information on the cleanup process and cleanup definitions, visit this site: http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process__steps_defns.htm

This focus sheet is intended to help the user understand the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC. It does not establish or modify regulatory requirements.

To ask about the availability of this document in a version for the visually impaired call the Toxics Cleanup Program at 360-407-7170. Persons with hearing loss, can call 711 for the Washington Relay Service. Persons with a speech disability can call (877) 833-6341.

MTCA Requires Hazardous Waste Sites be Ranked

Every hazardous waste site in Washington is unique and poses a potentially different type and level of risk to human health and the environment. The Model Toxics Control Act (MTCA) requires these sites to be ranked relative to each other to guide Ecology's use of cleanup resources. Working with the Science Advisory Board, Ecology developed a ranking system for hazardous sites known as the Washington Ranking Method (WARM).

Ecology ranks a site after the agency gathers enough information to complete a site hazard assessment (SHA). Owners and operators and any other potentially liable persons (PLPs) known to the agency are notified when their site is ranked and placed on Ecology's Hazardous Sites List. Additions to the list are announced twice each year.

What Does the Washington Ranking Method Do?

A site's potential threat to human health and the environment is estimated using the data gathered during the SHA. The WARM categorizes sites on the basis of this information. Sites are ranked on a scale of one to five, with a score of one representing the highest relative level on concern, and five the lowest.

The WARM is designed to:

- Provide a consistent, objective means of assessing sites.
- Establish a scientifically defensible method of evaluating sites.
- Maximize accuracy with minimum data.
- Provide adequate distinction between sites.

How Will the Rankings be Used?

It is important to keep in mind that hazardous site ranking is not the same as risk assessment. Rather, it is an estimation of the potential threat posed by a site relative to all other ranked sites in the state. An actual assessment of a site's health risk is determined after detailed data has been gathered through a remedial investigation.

The WARM provides a framework in which to organize and compare sites. However, it is not the only factor used to determine which sites receive priority for Ecology's resources. Other considerations include the availability of funds, the potential cost of cleanup, the level of cooperation shown by a responsible party, and public concern about a site.

How Does the Washington Ranking Method Work?

When ranking a site, Ecology considers the primary routes through which humans or the environment could be exposed to hazardous substances found on that site. These routes include air, surface water and ground water. For each "exposure route," the following information is evaluated to determine the relative risk posed by each site.

Substance Characteristics	Site Characteristics	Exposure Potential
Toxicity of substance	Migration potential	Population
Quantity of substance	Soil permeability	Sensitive environment
Mobility of substance	Average rainfall	Surface water uses (drinking water, irrigation, fisheries)
Containment	Flood plain	
	Terrain slope	
	Distance to ground water	Ground water uses

What is the Relationship Between the WARM and the Federal Hazard Ranking System?

The Federal Hazard Ranking System's purpose is to nominate hazardous waste sites with high federal scores to the National Priorities List (NPL). The federal system is used to set cleanup priorities for the Environmental Protection Agency. The WARM is not intended to duplicate the Federal Hazard Ranking System model. The purpose of WARM is to help Ecology set priorities for sites not on the federal list.

How Can I Get More Information?

For additional information on the Washington Ranking Method, contact the Department of Ecology, (360) 407-7170), Toxics Cleanup Program, P.O. box 47600, Olympia, WA 98504-7600. You may also visit the Ecology website at www.ecy.wa.gov and click on *Programs* then *Toxics Cleanup*. For information on the cleanup process and cleanup definitions visit: http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process__steps_defns.htm, or for information on a specific site, please contact the appropriate regional office listed below.

Central Region (*Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima*)	15 West Yakima Ave, Suite 200 Yakima WA 98902-3452	509/575-2490
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What is the Hazardous Sites List?

The Hazardous Sites List is a list of sites that have been assessed and ranked using the Washington Ranking Method (WARM). The list, which is a requirement of the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC, helps the Department of Ecology (Ecology) target where to spend cleanup funds. The list is updated twice a year.

How Are Sites Ranked?

Once Ecology receives a complaint about a piece of property or the practices of an owner or operator of a piece of property, an Ecology inspector or other delegated agency representative will go to the site and conduct an initial investigation. This involves looking at the present conditions of the site for signs of possible spills or discharges and the use and storage of hazardous waste. If Ecology determines further work is required after the initial investigation, a site hazard assessment (SHA) will be conducted. An SHA provides Ecology with basic information about a site.

Once an SHA has been conducted, Ecology then uses the WARM to estimate the potential threat the site poses if not cleaned up. Sites are ranked on a scale of one to five, with one representing the highest level of concern and five the lowest. When ranking a site, the primary exposure routes that could pose a risk to the public and the environment are taken into consideration. These are air, surface water, any release to sediments, and groundwater.

Hazard ranking is not an evaluation of the absolute risk a site poses to human health and the environment. Rather, a site's rank is relative to all other similarly assessed and ranked sites in the state. Information gathered during the SHA is used to determine the pathway scores of all applicable routes of exposure at the site

How Does a Site Get on the List?

Once a site goes through the ranking method and is ranked, it will appear on the Hazardous Sites List. Updates to the list occur at the end of February and August, twice yearly.

How Does the Site Ranking Affect Cleanup?

Ranking a site helps Ecology determine where to spend funds. However, public concern, a need for immediate response, and the availability of funding and cleanup staff also affect which sites get first priority for cleanup.

Can Site Rankings Change?

Ecology generally does not rerank sites, although a site's rank can change. Ecology may re-think a site if new or additional information is discovered that changes the site's relative health and environmental risk. The ranking system works similar to grading on a curve. The highest scoring sites are ranked as "ones" and the lowest as "fives." Thus, adding or removing sites from the list over time may also affect a site's rank.

How Does a Site Get Removed from the List?

A site may be removed from the list only if the site is cleaned up. In some cases, long-term monitoring and periodic reviews may be required to ensure the cleanup is adequate to protect the public and the environment. Ecology will provide public notice for any site it proposes to remove from the Hazardous Sites List.

Definitions

Each site on the Hazardous Sites List is categorized according to the status of the cleanup at the site. The site status categories used by Ecology are intended to give a general indication of the progress at the site. Typical categories include:

Awaiting further remedial action. This means cleanup work has not yet started at the site. Only a site hazardous assessment (SHA) has been done on the property.

Remedial action in progress. These are sites at which Ecology or the responsible party (with Ecology's oversight) has started investigations, active construction, or actual cleanup work.

Construction complete. At these sites all major cleanup work has been completed, but conformational monitoring or operation and maintenance may continue to be performed at the site.

Independent remedial action. This indicates that the site owner/operator or the responsible party has independently conducted cleanup at the site.

How Can I Get More Information?

You can receive a copy of the Hazardous Sites List by calling (360) 407-7170 or by going to Ecology's website at http://www.ecy.wa.gov/programs/tcp/sites/SiteLists.htm. For more information on a specific site, please contact the appropriate regional office listed below.

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