



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (425) 649-7000

January 22, 2002

File
-10116
-Bldg info
-Dept. of Ecology
~~at~~
Cleanup

Mr. Hal Reardon, Member
Garnet, LLC
980 East 74th Lane
Lynden, WA 98264

Dear Mr. Reardon:

Re: Request for Voluntary Cleanup Program Review

Thank you for submitting your reports for the Washington State Department of Ecology's (Ecology's) review. Ecology appreciates your initiative in pursuing a voluntary cleanup under the Model Toxics Control Act.

The Washington State Department of Ecology's Toxics Cleanup Program has reviewed the following information regarding the 1616 Cornwall Building, aka the Old Sears Building, located at 1616 Cornwall Avenue, Bellingham:

1. Environmental Site Assessment Phase I, dated 4/27/1990, by Kleinfelder, Inc.
2. Environmental Site Assessment Work Plan for Phase II, dated 6/6/1990, by Kleinfelder, Inc.
3. Environmental Cleanup Report, dated 2/8/1993 (faxed), by Robert Welch Enterprises.
4. Ecology cleanup file information, including letters.

Based upon the information listed above, Ecology has determined that, at this time:

1. The previous letter from me to Mr. Welch dated 2/8/1993 is not the equivalent of letters currently known as "no further action" letters obtained through the Voluntary Cleanup Program (VCP). That letter indicated a "completed status" was to be assigned to the cleanup based on information provided. A more detailed VCP review which included information not available previously (Kleinfelder, Inc. reports) concludes further remedial action is necessary.
2. A waste oil tank (area B, aka tank 1) was removed, and the soil was sampled for petroleum products, but nothing else. The analytical results



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indicated that the petroleum products were present, but at levels below cleanup standards, and therefore, a cleanup was not necessary. Ecology guidelines then and now recommend additional sampling if ANY significant petroleum is detected, because that indicates a potential leaky tank, and with waste oil tanks the potential exists for other substances besides petroleum to be released. The additional sampling recommended is for priority pollutant metals, chlorinated solvents, and polychlorinated bi-phenyls (PCBs).

3. A gas tank (area C, aka tank 3) was removed prior to this cleanup action (1985?). The area was re-excavated and found to be contaminated, but not all the contaminated soil was removed due to the building. An attempt was made to characterize the extent of the remaining contamination, but this information is insufficient to determine if the remaining contamination is a threat to human health and/ or the environment. Also, a re-circulation/treatment system was installed in the excavation, and the water was sampled and the results were satisfactory; however, excavation water is not always representative of the condition of the groundwater. It might be prudent to get more groundwater information in this area, so a monitoring well in this location is recommended.
4. A diesel tank (area D, aka tank 2) was removed and contamination was found. Soil excavation occurred, and deemed to be largely successful; however, a pocket of contamination remained. More information in this area, specifically regarding this remaining pocket of contamination, is recommended. Additionally, two monitoring wells were installed in the area, but only one was tested once. More information is needed on the placement and construction of these wells; also, why wasn't the other well tested? In the absence of information regarding these older wells, one or more new monitoring wells are recommended.
5. There are other areas of the site that potentially could have problems, which were identified in the Kleinfelder, Inc. reports, but that have not been investigated. There are no regulatory requirements from Ecology to investigate these areas, and no release have been indicated, but any future "no further action" letters would need to exclude these areas from such a determination without definitive information (i.e., sampling) that indicates these areas do not have problems. The areas in question are the 10,000 gallon heating oil tank (area A, aka tank 0), the hydraulic lifts and associated tanks (area E), the floor drain (area E) and piping which allegedly fed to the waste oil tank (area B, aka tank 1), and the 55 gallon drum storage area (area F).

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Please note that because your actions were not, or will not be conducted under a consent decree with Ecology, this letter is not a settlement by the state under RCW 70.105D.040(4) and is not binding on the agency. Further action could be required at your site regardless of how strictly you follow Ecology's advice.

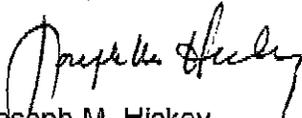
The opinions presented by Ecology in this letter are made only with respect to the information provided in the reports, documents, and telephone conversations listed above. This opinion is only applicable to the specified site (or area of site) and may not be used to justify action at another site (or area of the site.)

Ecology does not assume any liability for any release, threatened release or other conditions at the site, or for any actions taken or omitted by any person or his/her agents or employees with regard to the release, threatened release, or other conditions at the site.

Again, thank you for taking the initiative to voluntarily address the contamination at your site. Your efforts are recognized by Ecology as a positive step in our work to protect human health and the environment in Washington State.

If you have any questions regarding this letter, please contact me at 425-649-7202.

Sincerely,



Joseph M. Hickey
Toxics Cleanup Program

JH:jh

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FACSIMILE TRANSMITTAL SHEET

TO: Hal Reardon **FROM:** Brian D. Gouran
COMPANY: Gamet, LLC **DATE:** March 5, 2002
FAX #: (360) 354-8517 **PAGES:** 6
CC: **PROJECT NO.** 202026
FAX #:
RE: Voluntary Cleanup Program Review Proposal

Review & Comment For Your Information Urgent Please Recycle

NOTES/COMMENTS:

Please find attached the proposal you requested for a review of the Washington State Department of Ecology Voluntary Cleanup Program letter dated January 22, 2002 for the property at 1616 Cornwall in Bellingham, Washington. Please feel free to contact myself or Tom Bennett if you have any questions.

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