

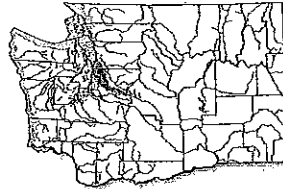


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

P.O. Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

February 19, 2002

CERTIFIED MAIL



Your address
is in the
**Cedar-
Sammamish**
watershed

Mr. Eric Koltes
Environmental Partners, Inc.
10940 NE 33rd Place, Suite 110
Bellevue, WA 98004

Dear Mr. Koltes:

Thank you for submitting the results of your independent cleanup action(s) for the Washington State Department of Ecology's (Ecology) review. Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA). Ecology's Toxics Cleanup Program has completed an initial review of the following information regarding NW Wire Rope and Equipment, located at 2301 Lincoln Avenue, Tacoma, WA 98421, to determine if the information provided to Ecology is sufficient to provide a "no-further-action" (NFA) letter under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW:

- Shannon & Wilson, Inc., **Technical Memorandum for the Results of Shallow Soil Vapor and Groundwater Assessment**, March 1992.
- Shannon & Wilson, Inc., **Technical Memorandum 02 Monitoring Well Installation and Groundwater Sampling Operation**, September 1992.
- Shannon & Wilson, Inc., **First Quarterly Groundwater Sampling Activities**, October 1992.
- Shannon & Wilson, Inc., **Technical Memorandum 04 Second Quarterly**

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Groundwater Sampling Activities, January 1993.

- Shannon & Wilson, Inc., **Technical Memorandum 05 Third Quarterly Groundwater Sampling Activities, June 1993.**
- Shannon & Wilson, Inc., **Technical Memorandum 06 Fourth Quarterly Groundwater Monitoring Activities, January 1993.**
- Shannon & Wilson, Inc., **Fifth Quarter Groundwater Sampling Results for Northwest Wire Rope and Equipment, October 1993.**
- Shannon & Wilson, Inc., **Groundwater Sampling and Limited Subsurface Exploration for Northwest Wire Rope and Equipment, June 1996.**
- Environmental Partners, Inc., **Groundwater Sampling and Well Decommissioning Letter Report, June 1996.**

Your reports will be kept in the Central Files of the Southwest Regional Office (SWRO) of Ecology for review by appointment only. Appointments can be made by calling the SWRO resource person, at (360) 407-6365.

As a result of this initial review, it has been determined that the information relating to the cleanup of the site located at 2301 Lincoln Avenue is incomplete. Ecology will need additional information with regard to the groundwater contamination at this site to determine if an NFA can be issued.

Groundwater contamination history shows levels of total petroleum hydrocarbons as gasoline and lead above the allowable levels for unrestricted land use. Ecology requires four consecutive quarters of monitoring to demonstrate actual groundwater conditions. Up to this date, NW Wire Rope and Equipment has three monitoring events that reflect analytical results below unrestricted land use criteria. Ecology understands that Environmental Partners believes the September 1993 groundwater monitoring event which exceeded the limit for lead was a result of turbidity in the sample and not dissolved lead as regulated. To make this demonstration another round of groundwater sampling will have to be analyzed for both total and dissolved lead.

Ecology understands there are only two wells left on site due to the excavation of MW-3 after a surface release of petroleum into the monitoring well, and is satisfied the contamination resulting from this release was appropriately extracted. Please obtain groundwater samples from MW1 and MW2 in March or early April when the groundwater should be near its highest, and have them analyzed for total petroleum hydrocarbons as gasoline and lead.

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Ecology has noted that not all of the soil contamination was removed during the final cleanup action. Confirmational soil sampling shows a gasoline concentration of 330 parts per million left in the north excavation wall. Environmental Partners contends that this amount of contamination should be considered "de minimus" and does not pose a threat to human health or the environment. Due to historically low levels of benzene, toluene, ethyl-benzene, and xylenes (BTEX) in the soil and groundwater on this site, Ecology will accept this position and issue an unrestricted NFA if the final round of groundwater monitoring shows that the groundwater has still not been impacted by the residual contamination.

Please note that because your actions were not, or will not be conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(i) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

The opinions presented by Ecology in this letter are made with respect to the information provided in the documents listed above. This opinion is only applicable to the specified site (or portion of the site) and may not be used to justify action at any other site (or portion of the site) nor any other properties owned or operated by Environmental Partners, Inc., or Mr. Ron Kline.

The State, Ecology, and its officers and employees are immune from all liability and no cause of action of any nature may arise from any act or omission in providing this determination.

If you have questions or comments about any of the information presented in this letter, please contact me at (360) 407-6261.

Sincerely,



Lisa Pearson
Project Engineer
Toxics Cleanup Program
Southwest Regional Office

LP:as

cc: Mr. Ron Kline
cc: Charles Cline, Dept. of Ecology