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February 7, 2002

Mr. Chuck Cline
Washington Department of Ecology - Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Re: Northwest Wire Rope & Equipment
LUST Site ID 101295

EPI Project No. 33501.1

Dear Mr. Cline:

During a preliminary meeting on July 20, 2000 with Ms. Lynn Gooding and you, it was EPI's understanding that the Washington State Department of Ecology (Ecology) would issue a "No Further Action" (NFA) designation with no institutional controls for the Northwest Wire Rope & Equipment site located at 2301 Lincoln Avenue in Tacoma, Washington (subject property) if the following two conditions were met:

- An additional round of ground water sampling confirmed that ground water remains in compliance with the MTCA Method A cleanup levels for gasoline-range petroleum hydrocarbons (GRPH); and
- A letter of final disposition for petroleum-contaminated soils (PCS) that were excavated at the site could be provided to Ecology.

Ecology had previously agreed with this approach for the following reasons:

- After removing the source of ground water impacts at the site (i.e., former gasoline underground storage tank (UST) and associated PCS), concentrations of GRPH in ground water have been below the Model Toxics Control Act (MTCA) Method A ground water cleanup level of 1,000 micrograms per liter ($\mu\text{g/L}$) for the last three ground water sampling events. These sampling events represent a time span of over 7 years.
- At the time of UST closure and subsequent petroleum-contaminated soil removal (i.e., 1991), the only detected concentration of GRPH remaining in soils at the site was 330 milligrams per kilogram (mg/kg). In the nine years since the UST and

associated PCS removal, it is highly likely that this concentration has been attenuated through leaching and natural biodegradation. Furthermore, there is no reason to believe that GRPH concentrations will be higher farther from the source area.

- MTCA Method A cleanup levels for GRPH in soil are based upon protection of ground water. If ground water is not impacted at concentrations above MTCA Method A cleanup levels, any residual soil impacts from 1991 must therefore be, by definition, protective of ground water.
- Soil samples collected from a boring installed immediately between the building and the former UST excavation did not contain concentrations of GRPH above 50 mg/kg.
- A soil sample collected from a boring installed on the side of the building opposite of the UST excavation did not contain detectable concentrations of petroleum hydrocarbons.

Subsequently, EPI submitted the following:

- A Voluntary Cleanup Program (VCP) submittal package;
- A check in the amount of \$500 for the VCP oversight charges;
- A letter from the contractor (i.e., CEcon Corp) who performed the UST and PCS removal in 1991 stating their recollections of the original site work; and
- A letter report documenting recent ground water sampling and other field activities performed at the subject property.

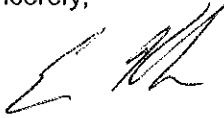
Based upon the analytical results collected from the recent ground water sampling event, it is evident that soil conditions at the site are protective of ground water and any remaining soil contamination at the site should be considered *de minimis*.

Therefore, it is the opinion of both Northwest Wire Rope & Equipment and EPI that all necessary work has been performed both to assure compliance with MTCA Method A soil and ground water cleanup levels and to fully document that compliance to Ecology. Moreover, the data clearly demonstrate that the residual impacts observed in 1991 do not represent a threat to human health and the environment in 2002. Northwest Wire Rope & Equipment and EPI therefore respectfully request that Ecology grant the subject property a NFA designation without institutional controls and to remove the subject property from Ecology's database of contaminated sites.

Mr. Chuck Cline
Washington State Department of Ecology
Re: Northwest Wire Rope & Equipment
EPI Project No. 33501.1
February 7, 2002

If you have any questions, please do not hesitate to contact me at (425) 889-4747.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Koltes', with a stylized flourish at the end.

Eric Koltes
Project Manager

cc: Mr. Ron Kline, Northwest Wire Rope & Equipment