



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

August 3, 2009

Ms. Renee West  
Verbeek Wrecking  
18416 Bothell Everett Hwy  
Bothell, WA 98012

**Re: Opinion pursuant to WAC 173-340-515(5) on  
June 15, 2009, Remedial Investigation Work Plan  
for the following Hazardous Waste Site:**

- Name: Verbeek Wrecking
- Property Address: 18416 Bothell Everett Hwy, Bothell, WA 98012
- Facility/Site No.: 51544175
- VCP Project No.: NW1982

Dear Ms. West:

Thank you for submitting the Work Plan (the work plan) referenced above for the Verbeek Wrecking facility (the Site or the Verbeek 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 (TPH-G), diesel-range petroleum hydrocarbons (TPH-D), motor oil-range petroleum hydrocarbons (TPH-O) in Soil;
- Hydrocarbon-related volatile organics - benzene, toluene, ethylbenzene, xylenes (BTEX) in Soil
- Polycyclic aromatic hydrocarbons (PAHs) in Soil;
- Cadmium in Soil;
- Gasoline-range hydrocarbons, benzene, and naphthalene in 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).



Mr. Daniels  
August 3, 2009  
Page 2

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. June 15, 2009, *Remedial Investigation Work Plan, Verbeek Wrecking Site, Bothell, Washington*, prepared by Landau Associates.
2. May 20, 2009, *Interim Action Cleanup Report, Verbeek Wrecking Property, 18416 Bothell-Everett Highway, Bothell, Washington*, prepared by Landau Associates.
3. January 29, 2009, *Re: Further Action Determination under WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site: Name: Verbeek Wrecking*, letter from Department of Ecology to Ms. Renee West, Verbeek Wrecking

The Ecology January 29, 2009 opinion letter requested clarification of an interim action report previously prepared for the Site and required preparation of a Remedial Investigation/Feasibility Study (RI/FS) to complete site characterization and to select a cleanup action. Landau Associates' May 20 report responds to the request for clarification, and their June 15 report is the requested RI work plan. Ecology's comments on the work plan are provided in this opinion letter.

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 at (425) 649-7190.

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

- Gasoline-range petroleum hydrocarbons (TPH-G), diesel-range petroleum hydrocarbons (TPH-D), motor oil-range petroleum hydrocarbons (TPH-O) in Soil;
- Hydrocarbon-related volatile organics - benzene, toluene, ethylbenzene, xylenes (BTEX) in Soil
- Polycyclic aromatic hydrocarbons (PAHs) in Soil;
- Cadmium in Soil;
- Gasoline-range hydrocarbons, benzene, and naphthalene in Ground Water.

Mr. Daniels  
August 3, 2009  
Page 3

The Site is more particularly described below, and in Enclosure A, which includes a detailed Site diagram:

The Verbeek Site is defined as the area and volume of contamination associated with automotive wrecking operations. As such the Site occupies much of the Verbeek property, as shown on the attached Figure 9. However, a portion of the property (designated Area B) may not be contaminated from automotive wrecking operations, but does contain contaminated fill from the City of Seattle's Gas Works Park. The presence of this contaminated fill is a separate release under MTCA and would comprise a separate site (termed the Contaminated Fill Site for purposes of this letter). If the Verbeek Site and the Contaminated Fill Site are separate and not commingled, they can be treated for characterization and remediation purposes as two different entities. If however, the contamination from the two sites overlaps, then both the Contaminated Fill Site and the Verbeek Site must be considered as one site. This opinion letter assumes that the two sites are separate.

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:**

It is likely that implementation of the work plan will provide sufficient data to address the issues raised in Ecology's January 29, 2009 opinion letter and to select a cleanup action for the Verbeek Site, provided the specific comments listed below are incorporated into a revised work plan or into the Remedial Investigation and report.

- Definitions of the property boundary versus the Verbeek Site and Contaminated Fill Site boundaries should be provided, and the three shown on an illustration for clarity.
- A description of local terrestrial habitat (parks, farmland, etc) needs to be provided, as the precursor for conducting a terrestrial ecological evaluation. Also, a more complete description of surface water conditions on and near the Site needs to be provided, including North Creek and Penny Creek.
- Ecology and Snohomish County records of storm water system inspections need to be referenced, and a synopsis of the records included. These records indicate the potential for gasoline and waste material discharge into the sanitary and storm drainage system.

- In the section of the RI report relating to a summary of the interim action soil bio-remediation, there needs to be a discussion of contaminant reduction with time. In other words, the data should show a progressive decline in contaminant concentrations as the bio-remediation proceeded. This will provide stronger evidence that biological degradation, and not soil mixing, was the primary treatment agent.
- A discussion of current and future land use needs to mention that residential properties adjoin the Site to the west and north.
- PCB analyses need to be run on a subset of the proposed surface soil samples obtained from the original ground surface. Near-surface soils have not previously been analyzed for PCBs, which are sometimes present at wrecking yards from waste oil application for dust control purposes or from other disposal practices.
- If MW-1 is still accessible, it should be sampled at the same time and for the same parameters as MW-3 and MW-4. Although MW-1 is within Area B, it is also likely to be at a downgradient location with respect to Areas A or C.
- An investigation needs to be undertaken in Area B sufficient to show that the Verbeek Site does not extend into this area. In particular, it needs to be shown that surface soils in undisturbed areas (i.e., the original ground surface prior to implementation of the interim action) are "clean", and that the contamination previously documented in Area B is not related to automotive wrecking activities. Without this demonstration, this opinion letter will likely need to be recalled and replaced with a Further Action determination. The Further Action determination would likely conclude that the work plan is not sufficient to address the mixed sites.

**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.

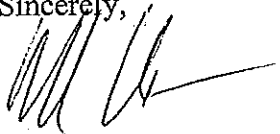
Mr. Daniels  
August 3, 2009  
Page 5

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) 649-4310.

Sincerely,



Mark Adams  
NWRO Toxics Cleanup Program

MA: kp

Enclosures (1): A

cc: Larry Beard, Landau Associates  
Steve Parkinson, Groff Murphy

**Enclosure A**  
**Site Description**  
**Verbeek Wrecking**

The thirteen-acre Verbeek property (the property) is located on the Bothell-Everett Highway, in an unincorporated part of Snohomish County. Commercial and retail business extend north and south from the property along both sides of the highway, and are backed by residential areas and undeveloped land. A large regional park, the North Creek County Park, is located about ½ mile west of the property, and an apparent former farmstead is located a few hundred feet to the northwest. The park and farmstead contain mostly open grass and wetland areas, with lesser areas of forest.

The property is situated in an area of somewhat hummocky topography, between the North Creek valley on the west and an unnamed drainage on the east. The property itself occupies the eastern side of a small north-south trending depression, and generally slopes down to the west. Natural runoff from the property appears to have originally flowed south following the axis of the depression; storm drains installed at the property currently capture the runoff and maintain discharge to the south.

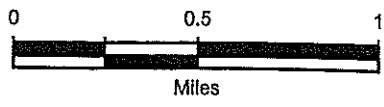
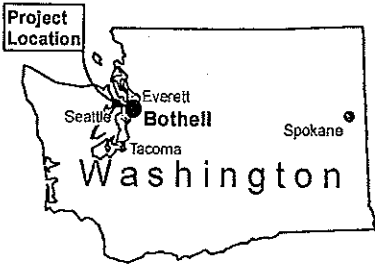
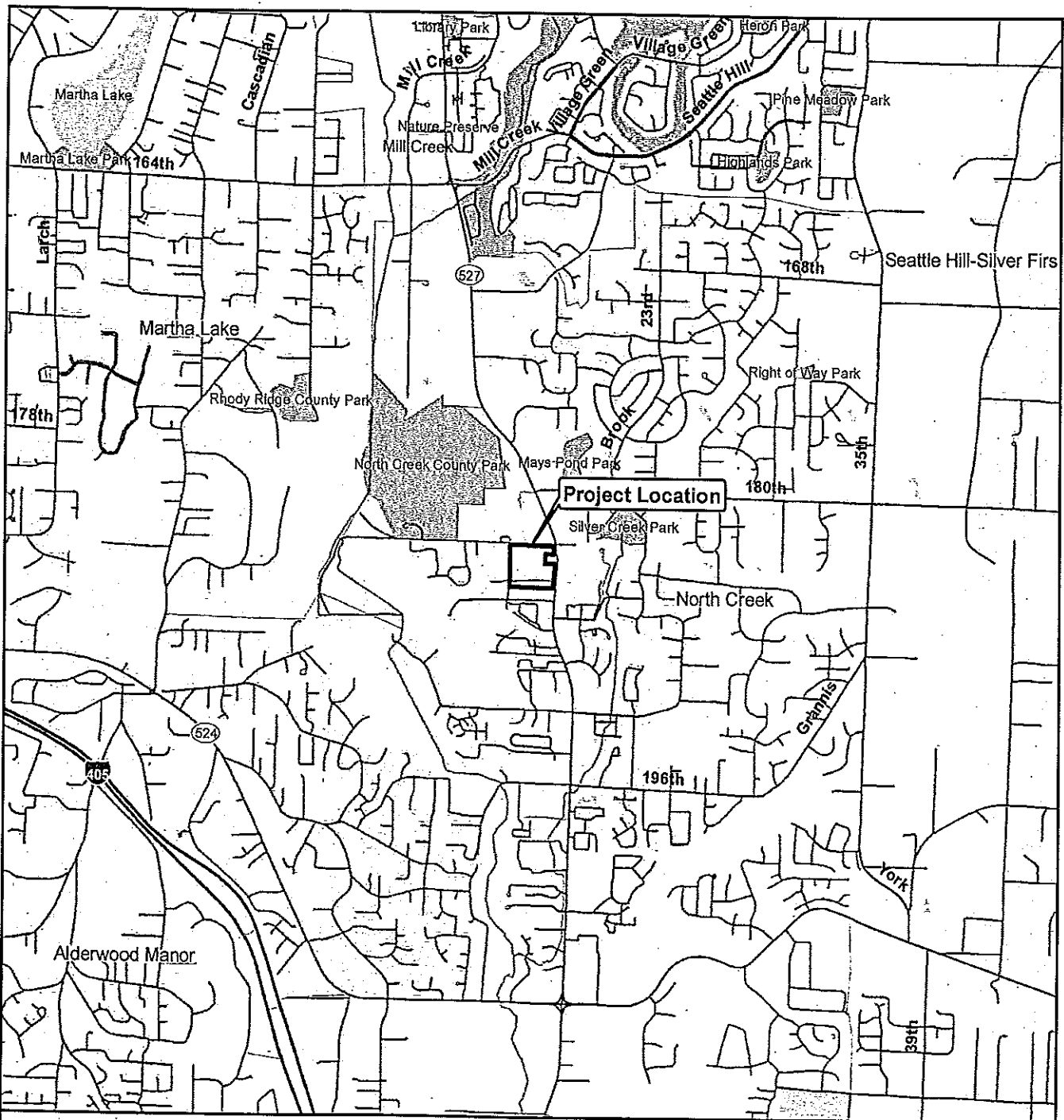
Geologic and ground water conditions at the property are not well understood. Significant fill has been placed in the original depression to raise property grades, and till may be present beneath the fill. Shallow ground water apparently occurs perched near the surface during the wet winter months. An underlying water table aquifer may exist, with the depth to water about 35 feet. Ground water flow directions have not been determined but are likely to the south, sub parallel to flow in North Creek and the unnamed drainage.

Verbeek Wrecking operated at the property between 1956 and 2008. During this 53-year period, a variety of automobile wrecking and salvage activities took place, including vehicle storage, vehicle refueling, body and engine disassembly, parts storage and sales, and automobile crushing and shearing. Soil and ground water that became contaminated due to these operations comprise the Verbeek site (the Site). The boundaries of the Site are not well established, but are likely not the same as the boundaries of the property.

An interim cleanup action took place at the Site from July to October 2008. The cleanup action consisted of surface gravel removal and stockpiling, soil excavation guided primarily by visual signs of contamination, bio-remediation, and soil replacement back into the excavation following bio-remediation. The interim action was not well documented, but did suggest the soil contamination was broadly distributed across the property and relatively shallow in depth (most

contamination concentrated within a few feet of the surface). The areas of deepest contamination were associated with the former engine disassembly area, the automobile crushing and shearing area, and the steam cleaner area.

A second source of contamination, consisting of PAH-contaminated fill, also exists at the property. The fill was imported from the City of Seattle's Gas Works Park, and placed within the former drainage. It is not yet clear whether the PAH-bearing fill was placed over soil contaminated from vehicle wrecking operations, whether vehicle wrecking operations further contaminated the PAH-bearing fill, or whether the two are completely separate.



Data Source: ESRI 2008

Verbeek Wrecking  
 RI Work Plan  
 Bothell/Snohomish County  
 Washington

Vicinity Map

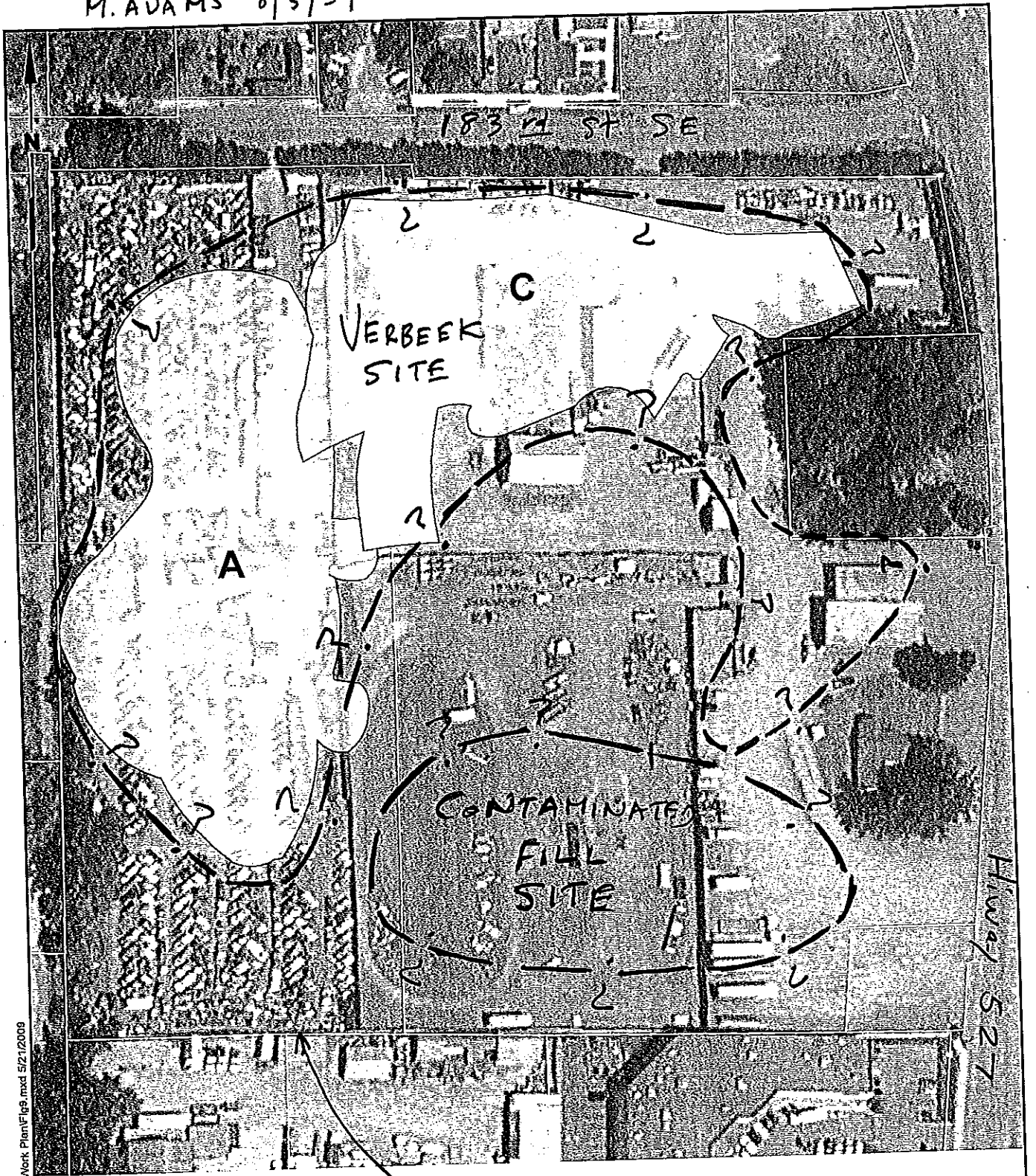
Figure  
 1

Y:\Projects\117300\MapDocs\RI Work Plan\Fig1.mxd 5/20/2009





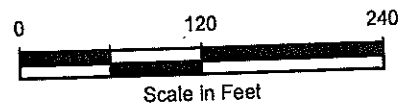
M. ADAMS 8/3/09



**Legend**

Soil cleanup action area (approximate limits)

VERBEEK PROPERTY LINE



Data Source: Snohomish County; ESRI

Verbeek Wrecking  
 RI Work Plan  
 Bothell/Snohomish County  
 Washington

Cleanup Action Areas  
 A and C

Figure  
 9

Y:\Projects\1173001\MapDocs\RI Work Plan\Fig9.mxd 5/21/2009



