

### STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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January 17, 2017

Mr. Stewart Mhyre Edmonds School District #15 20420 68<sup>th</sup> Ave W Lynnwood WA 98036-7405

### Re: Request for Information on Status of VCP Project for the following Site:

- Site Name: Edmonds SD #15 Maintenance & Transportation Department
- Site Address: 2927 Alderwood Mall Blvd, Lynnwood, WA 98036-4718
- Facility/Site No.: 56638923
- VCP Project No.: NW2712
- Cleanup Site ID No.: 12111

Dear Mr. Mhyre:

The Department of Ecology (Ecology) appreciates your decision to clean up the Edmonds SD #15 Maintenance & Transportation Department facility (Site) independently. Our records indicate that you have not conducted any remedial actions during the past year at the Site. The last information Ecology received was an underground storage tank site check report dated August 29, 2016 on September 2, 2016. Ecology has not provided an opinion on this project since May 2014.

This letter requests information on the status of your cleanup and your continued interest in the Voluntary Cleanup Program (VCP). Please note that if no response is received within 30 days of the date of this letter, Ecology may terminate the VCP Agreement governing this Project.

### **Request for Information**

Please submit the following information to Ecology within 30 days of the date of this letter:

- 1. Cleanup status report.
- 2. Any reports documenting the cleanup or other activities associated to the cleanup.

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3. A work plan and schedule for completing the cleanup.

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> 4. A VCP "Change of Contact Form" for each of the following VCP project contacts that has changed: project manager, project billing contact, project consultant, project attorney, or property owner. The form should also be submitted if contact information for any of the above project roles has changed. The form can be found at: <u>https://fortress.wa.gov/ecv/publications/SummaryPages/ecv070218.html</u>

> The schedule for completing cleanup actions must be included with your response and should include significant milestones, such as remedial investigation results, quarterly ground water compliance monitoring events, feasibility study evaluations, and anticipated submittal of documents and requests for Ecology opinions. Contingencies and alternative approaches should be identified if the cleanup is not progressing within the expected time frame.

Please note that ground water monitoring only is not considered by Ecology to be a remedial activity.

#### Next Steps

Based on your response, Ecology may contact you and discuss whether continuing your participation on the VCP is warranted at this time. A decision to terminate your participation will be provided in writing. As stated above, the Agreement governing this Project may be terminated if a response is not received within 30 days of this letter.

#### **Contact Information**

We are committed to working with you to accomplish the prompt and effective cleanup of the Site. If you have any questions about this request, please contact me at (425) 649-7064 or by email at heather.vick@ecy.wa.gov.

Sincerely,

Habrina

Heather Vick VCP Site Manager Toxics Cleanup Program

Certified Mail [9171 9690 0935 0132 2125 21]

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From: Kurt Easthouse [mailto:kurte@EHSINTL.COM] Sent: Thursday, February 2, 2017 9:41 AM To: Heather Vick (ECY) <<u>HVIC461@ECY.WA.GOV</u>> Subject: Edmonds School District VCP Site NW2712 Status Update

Heather – This email is in response to your request for information letter (attached) and your email below in regards to the Edmonds School District Maintenance and Transportation Facility located at 2927 Alderwood Mall Blvd, Lynnwood, WA. We have been conducting a Remedial Investigation (RI) and Feasibility Study (FS) since October 2015 to the present time at this site. A general site map is attached for reference. Activities completed to date are summarized below along with a schedule of future planned activities. Let me know if you'd like to meet to go over any of this in more detail.

## **Remedial Investigation (RI)**

- A product removal program began in October 2015 with the sampling and profiling of the oil in groundwater well AB-23 and monthly removal events from December 2015 through December 2016. This program was initiated in response to a request by Ecology to start a floating product removal program.
- A ground penetrating radar (GPR) survey was conducted in November 2015 and scanned several areas of the subject property where there was evidence of former underground storage tanks (USTs).
- Soil and groundwater sampling (EP-29 through EP-95) was conducted with a direct push dill rig in November 2015 to characterize areas of known and suspected contamination.
- Eight test pits (TP-1 through TP-8) were excavated in November 2015 on Lot 7 to evaluate the potential presence of debris material.
- Groundwater monitoring wells (EB-13 through EB-19) were installed in November 2015 to further characterize areas of known and suspected contamination.
- Analysis of groundwater flow patterns utilizing groundwater monitoring wells occurred in December 2015, February 2016, June 2016, and October 2016.
- Groundwater was sampled and tested from the on-site wells in December 2015, and March, May, July, September, and October 2016.
- Storm-water was sampled and tested in October of 2016.
- Testing for remedial design parameters was conducted in November and December 2015 for one or more of the following: grain size analysis, total organic carbon (TOC), ethane/ethane, methane, hydrogen, chloride, nitrate, manganese, ferrous iron, sulfate, sulfite, iron, pH, and alkalinity.
- EHSI conducted oversight activities in late December 2015 in regards to the City of Lynnwood project for installation of a new pumping station on the subject property. The oversight activities involved collecting soil and groundwater samples during the drilling of soil boring EB-20 near the existing pump station on Lot 4 East.

After completion of field activities in December 2015, several data gaps were identified which led to additional site characterization in February 2016. The data gaps are summarized below:

• A buried debris area was encountered on Lot 7 and contained roofing material, wood, pieces of metal, and oily gravel. The roofing material was sampled and found to contain asbestos and polyaromatic hydrocarbons (PAHs). The soil and groundwater in this area

was above MTCA Cleanup Levels for total petroleum hydrocarbons (TPH) as oil, gammachlordane (pesticide), and 1-methylnaphthalene (semi-volatile organic compound).

- Three groundwater monitoring wells (EB-27 through EB-29) and four direct push borings (EP-99 through EP-102) were installed in February 2016 in this area to define the extent of contamination.
- A grab groundwater sample at EP-67 on Lot 4 West contained elevated dissolved arsenic levels above MTCA Cleanup Levels. Two groundwater wells (EB-21 and EB-22) were installed in February 2016 in this area to verify the previous results and to define the extent of the apparent groundwater contamination.
- The groundwater monitoring well (EB-14) installed in the steam cleaning station area had drilling refusal at about 8.5 feet below grade and was not deep enough to monitor the full vertical extent of contamination in this area. A deeper groundwater well (EB-31) was installed in February 2016 with a hollow-stem auger drill rig and was screened on top of the glacial till layer to above the perched shallow aquifer water table.
- Because contamination was found on Lot 4 West and Lot 7, it was decided to install additional groundwater monitoring wells (EB-23, EB-25, EB-26, and EB-30) in February 2016 for a more defensible groundwater flow analysis across the whole subject property.
- Because groundwater contamination was detected downgradient of the fuel pump island on Lot 4 East, it was decided to drill additional direct push borings in February 2016 along the 54-inch storm and 12-inch sanitary sewer line to determine if contamination could be entering the utility backfill or the sewer pipes.

After completion of field activities in February 2016, an additional data gap was identified in regards to the 54-inch storm and 12-inch sanitary sewer line which led to additional site characterization in May and October 2016. The data gap is detailed below:

- Because groundwater contamination was detected in the sample collected immediately adjacent to the 54-inch storm and 12-inch sanitary sewer line, four additional groundwater wells (EB-32 through EB-35) were installed during May 2016 in the backfill material of the utility line and sampled for potential contamination.
- Groundwater contamination by VOCs and TPH was identified at well EB-32 near the southeast property line. To further assess the potential for off-site migration of contaminants, in September of 2016 well EB-36 was installed along the 54-inch storm-sewer line at the southeast edge of the property boundary.
- To evaluate the potential for intrusion of contaminated groundwater into the 54-inch storm-sewer line, in October of 2016 a video inspection of the pipe was done and water samples were collected and analyzed from manhole access points along the pipe both upstream and down-stream from well EB-32.

The RI report is going through internal review and should be ready for submittal to Ecology on March 1, 2017.

# Feasibility Study (FS)

A preliminary cleanup action alternatives (PCAA) memorandum has been prepared and is currently going through internal review. The PCAA summarizes potential cleanup actions that will be evaluated in detail in the FS. Based on the RI, cleanup actions will be required at two general areas within the overall site: (1) the eastern portion of Lot 4 and (2) the central portion of Lot 7. The preliminary cleanup actions are listed below:

- In-situ treatment
- Limited hot spot removal and in-situ treatment
- Excavation and enhanced bioremediation
- Excavation.

The FS will be completed later this year and submitted to Ecology for review.

# Cleanup Action Plan

The Cleanup Action Plan (CAP) will be completed later this year and submitted to Ecology for review.

## Environmental Remediation Design and Construction Phase Services

EHSI is currently awaiting authorization from ESD to conduct remediation design, preparation of construction contract documents, pre-bid services, construction phase services, post-remediation reporting, and post-remediation monitoring. A schedule of activities is presented below:

- Cleanup action design will be completed by prior to April 11, 2017.
- Bid package preparation and assistance will be completed approximately from April 26 May 10, 2017.
- Remediation contract award will be completed by approximately May 24, 2017.
- Contract "Notice to Proceed" and construction field work will begin approximately on June 15, 2017 and completed approximately on September 15, 2017.
- Construction completion report will be completed by approximately September 15 December 15, 2017.
- Quarterly groundwater monitoring will occur from approximately September 15, 2017 September 14, 2018.
- Project closure with Ecology will be on approximately December 14, 2018.