



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 30, 2013

Edmonds School District #15
Maintenance & Transportation Department
C/O Kurt Easthouse – Principle Geologist
EHS-International
13228 NE 20th Street, Suite 100
Bellevue, WA 98005

Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Characterization for the following Hazardous Waste Site:

- Name: Edmonds School District #15, Maintenance & Transportation Facility
- Address: 2927 Alderwood Mall Blvd., Lynwood, WA. 98036
- Facility/Site No.: 56638923
- VCP No.: NW2712

Dear Mr. Easthouse:

Thank you for submitting documents regarding your proposed remedial action for the Edmonds School District #15 facility (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:

- Total Petroleum Hydrocarbons in soil & ground water;
- Volatile Organic Compounds in soil & 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).

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. Environmental Assessment Report - Edmonds School District Maintenance & Transportation Facility; Ecova Corporation, June 1991;
2. Environmental Assessment Report – Edmonds School District Maintenance & Transportation Facility; Ecova Corporation, September 1991;
3. UST Closure & Site Assessment Report – Edmonds School District #15 Transportation Center; Ecova Corporation, November 1991;
4. Report for Phase II Environmental Assessment of Former Waste Oil UST Area – Edmonds School District #15 Transportation Site; Ecova Corporation, April 1993;
5. Letter Report – Subsurface Conditions & Regulatory Status, Petroleum Hydrocarbons Investigation – Bus/Vehicle Maintenance Facility; Landau Associates, Inc., November 1993;
6. Report Environmental Investigations – Subsurface Conditions Service Bay #1 and Steam Cleaning Area – Bus/Vehicle Maintenance Facility; Landau Associates, Inc., July 1996;
7. Final Independent Cleanup Action Report – Edmonds School District # 15 Bus/Vehicle Maintenance Facility; Landau Associates, Inc., March 1997;
8. Environmental Audit – Bus/Vehicle Maintenance Facility; Landau Associates, Inc., June 1997;
9. Hazardous Materials Evaluation – Edmonds School District #15 Bus Barn; HWA GEOSCIENCES, Inc., February 1999;
10. Limited Field Investigation – Edmonds School District Transportation & Maintenance Facility; AMEC Earth & Environmental, Inc., April 2008;
11. Additional Groundwater Sampling – 2927 Alderwood Mall Boulevard; AMEC Earth & Environmental, Inc., May 2008;
12. Site & Exploration Plan – Lynwood Lift Station No. 8 Replacement; ZZA-Terracon, June 2008;
13. Edmonds School District #15 Maintenance & Transportation Facility – Supplemental Phase II Environmental Site Assessment – Final Report; EHS-International, Inc., February 2011;

14. Edmonds School District #15 Maintenance & Transportation Facility – Well Installation & Groundwater Sampling – Final Report; EHS-International, Inc., December 2012;
15. Edmonds School District #15 Maintenance & Transportation Facility – Modified Phase II Environmental Site Assessment – Final Report; EHS-International, Inc., December 2010;
16. Project Narrative for Edmonds School District No. 15 VCP Application; EHS-International, Inc., April 2013.

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):

- Total Petroleum Hydrocarbons in soil & ground water;
- Volatile Organic Compounds in soil & ground water.

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:**

- Ecology requires a final document that describes all historical contamination and work performed at the site, which includes:
 - All contaminants of concern;
 - Known sources of each contaminant;
 - Known potential pathways of exposure for each contaminant;
 - Known historical work that has been done to address each contaminant;

It appears that some of this work has been done, as noted in the above-referenced documents. However the documentation is fragmented and addresses contaminants and sources not apparently connected to the current VCP application. A final report should pull all of these together, and make clear if the current VCP application is intended to address all documents contaminants, sources, and potential pathways, in order for Ecology to provide an opinion on the proposed characterization.

- Ecology requires a final site diagram & map that clearly defines all these elements. The diagram should include sufficient information to define the nature and extent of the contamination caused by the identified release(s), as far as can be known at the present time. Again it appears in some of the above-reference documents that some of this work was done at various stages in the Site's history; however a clear, detailed diagram of the site that pulls all of this work together is needed in order for Ecology

to provide an opinion on the proposed characterization.

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.**

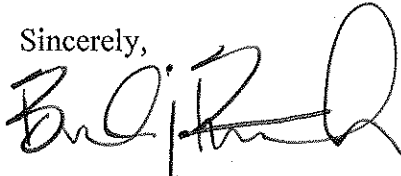
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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) 533-5537.

Sincerely,



Brad Petrovich
NWRO Toxics Cleanup Program

BP/SA