

United States Environmental Protection Agency
Region X
POLLUTION REPORT

Date: Friday, December 20, 2002

From: Michael Boykin

Subject: OPA Assessment

PSCI Tank Services

10230 East Riverside Drive, Bothell, WA

Latitude: 47.7611000

Longitude: -122.2061000

POLREP No.:	1	Site #:	Z095
Reporting Period:	12/02/02 to 1/24/03	D.O. #:	
Start Date:	12/2/2002	Response Authority:	OPA
Mob Date:	12/13/2002	Response Type:	Emergency
Demob Date:	12/13/2002	NPL Status:	
Completion Date:		Incident Category:	Removal Assessment
CERCLIS ID #:		Contract #	
RCRIS ID #:		Reimbursable Account #	Z095
FPN#	E03006		

Site Description

On December 2, 2002 the United States Environmental Protection Agency (EPA) was notified via City of Bothell personnel, of an anonymous caller reporting an intentional release of diesel-like product onto the ground at the PSCI Tank Services property line, with potential migration to wetlands and resulting discharge to the nearby Sammamish River.

The PSCI Tank Services (PSCI) facility, located at 10230 East Riverside Drive in Bothell, Washington, was operated as a residential UST removal and remedial business that, reportedly, has been inactive since March 2002, due to bankruptcy. A sister company, TerraSolve, has operated at the facility and continued unfinished remediation work from PSCI since March 2002. PSCI and TerraSolve are considered the Potentially Responsible Parties (PRP).

The EPA, START, Bothell personnel, and Washington Department of Ecology personnel conducted several site visits and reconnaissance with the PRP during the week of December 2, 2000, and found multiple tanks and drums with suspected diesel wastes and oily wastewaters. The amounts of wastes estimated to be on site were 4000 gallons of diesel and wastewater, 20 to 30 drums of tank bottom sludge and used absorbents, and 50 cubic yards of stockpiled petroleum-contaminated soil. Many of the bulk storage tanks and drums are full and are located both inside and outside of secondary containment. The secondary containment structures have an undetermined amount of diesel and wastewater present in the bottom. Many of the sludge and absorbent drums and assorted poly tanks are open to the atmosphere. A large black oil stained area with contaminated hay bales and absorbent boom was noted next to the large secondary containment structure at the NW corner of the facility and is reportedly the location where the intentional discharge occurred.

The PRP hired two contractors and conducted a site assessment and collected samples from the various media on site. The sampling events occurred without EPA concurrence and oversight and as a result no split samples were collected. The PRP refused access for EPA contractor sampling of the same media and for site assessment and documentation activities. The PRP did agree to cease waste generation activities (i.e., UST cleaning), place tarps over open tanks and drums and stockpiled soil/debris areas, and share PRP contractor sample analytical results and a removal/remediation work plan with the EPA.

Current Activities

On December 13, 2002, EPA (1) and the START-2 contractor (4) mobilized to the site to conduct an OPA assessment of areas outside the facility's boundaries where the intentional discharge of oil may have impacted off site soil and surface water. Upon arriving on site, EPA met with City of Bothell representatives who provided utility locating services and identified private property boundaries to assure that all work took place on city property. In addition, city personnel cleared areas of vegetation and debris proposed for sampling.

The START utilized a geoprobe to install five probe holes on a City of Bothell right of way (access road on north side of facility property), believed to be downgradient of the site. The START conducted continuous sampling/lithological logging, field screening of volatile headspace, and submitted surface and subsurface soil samples to an analytical laboratory for quick turnaround analyses.

EPA and START conducted reconnaissance of the adjacent wetland area and found active surface water flow parallel to the property fence line and the City of Bothell right of way where drilling and sampling occurred. It was determined that surface water flow through the wetlands ultimately discharged to the Sammamish River.

Planned Removal Actions

Subsequent to the OPA assessment of off-site migration, the PRP reached agreement with the EPA about on-site removal/remedial activities. Utilizing PRP-contractor analytical results, the planned removal actions are as follows:

1. Remove, transport, and dispose/recover/treat the estimated 3000-gallons of wastewater and 1000-gallons of waste diesel fuel on site on Monday, December 23, 2002.
2. Pressure-wash all tanks, drums, containers, and secondary containment areas and remove wastewater on Monday, December 23, 2002.
3. Stage and cover 30 drums of tank sludge and used absorbent in secondary containment to await work plan approval and final disposition in January.
4. Stockpiled soil/debris removal and disposal to occur in January 2003 after work plan approval.
5. Demolition of secondary containment areas, assessment of soil contamination, removal and confirmation sampling to occur in January 2003, after work plan approval.
6. Once EPA off-site sample results received and reviewed, further assessment of off-site migration may be warranted and conducted by PRP.
7. All activities to be monitored with EPA oversight and documentation.

Next Steps

1. EPA reviewed and provided comments on the work plan submitted by PRP contractor, US Environmental, Inc.
2. PRP to incorporate EPA comments, finalize work plan, and resubmit to EPA for review prior to any further removal/remedial work being conducted by PRP beyond liquid waste removal.
3. EPA will perform oversight of PRP liquid removal actions to occur on 12/23/02 - 12/24/02.
4. EPA will perform oversight of PRP soil, sludge and debris removal actions, proposed to occur during the week of 01/27/03.
5. EPA will perform oversight of PRP assessment of on-site/off-site contamination and migration pathways, and removal/remedial actions in the event contamination is found.

Key Issues

1. Need to resolve property boundaries and ownership issue so that on site contamination can be distinguished from off site contamination.
2. PRP's eagerness to hire contractors and conduct assessments and sampling without EPA concurrence on activities and quality assurance objectives, and lack of opportunity for EPA oversight of sample collection and obtaining split samples.

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