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March 5, 2021

Sonia Fernandez
VCP Coordinator
Department of Ecology
Toxics Cleanup Program
Northwest Regional Office
3190 160th Ave SE
Bellevue, Washington 98008

**RE: SUMMARY REPORT SUBSURFACE INVESTIGATIONS AND CLEANUP
ACTION
MUSCATEL MIDWAY PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON
FARALLON PN: 2532-001**

Dear Sonia Fernandez:

Farallon Consulting, L.L.C. (Farallon) has prepared this Summary Report to summarize the investigations and cleanup action completed at the property at 23418 Pacific Highway South in Kent, Washington (herein referred to as the Muscatel Midway Property). Farallon submitted an application to enter the Muscatel Midway Property into the Voluntary Cleanup Program (VCP) with the Washington State Department of Ecology (Ecology) on December 1, 2020. Ecology determined that there was insufficient information to enter the Muscatel Midway Property into the VCP as documented in the email regarding Muscatel Midway Property-23418 Pacific Highway South, Kent, WA 98032 dated December 3, 2020 from Sonia Fernandez of Ecology to Javan Ruark of Farallon (Ecology Email).

Also included in this Summary Report are updated cross sections and Terrestrial Ecological Evaluation (TEE). The initial cross sections and TEE were included in the *Cleanup Action Report, Affected Property, 23418 Pacific Highway South, Kent, WA, Source Property: 23428 Pacific Highway South, Kent, WA, Site: Southgate Oil Site, Facility/Site ID: 84946863* dated December 31, 2019, prepared by ECI (2019b) (Cleanup Action Report). This Summary Report, in conjunction with the Cleanup Action Report, complies with Ecology's Report Checklists guidance for submittal of reports required by the VCP. The information required by the Report Checklist guidance is summarized in this Summary Report and the documents referenced herein.

SUMMARY

The results of the subsurface investigations conducted by others from November 2017 to March 2019 at the Muscatel Midway Property identified total petroleum hydrocarbons (TPH) as gasoline-range organics (GRO), as diesel-range organics (DRO), and as oil-range organics (ORO); and benzene (collectively defined as the constituents of concern [COCs]) in soil at concentrations



exceeding the Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels for soil at the Muscatel Midway Property. Groundwater was not encountered to a total depth of 31 feet below ground surface (bgs). COCs were not detected at concentrations exceeding MTCA Method A cleanup levels in the soil samples collected from the base of the test pits and excavation, as discussed below. Therefore, groundwater is not a media of concern for the Muscatel Midway Property.

The subsurface investigations and the cleanup action are documented in:

- *Focused Subsurface Investigation Report, 23418 Pacific Highway South, Kent, Washington* dated December 18, 2017, prepared by ECI Environmental Services (ECI) (2017);
- *Phase II Environmental Site Assessment Report, Sound Transit-Federal Way Link Extension, Parcel FL-207, Former Dry Cleaner and Service Station, 23418 Pacific Highway South, Kent, Washington* dated September 21, 2018 prepared by GeoEngineers, Inc. (GeoEngineers) (2018a);
- *Phase II Environmental Site Assessment Report, Sound Transit-Federal Way Link Extension, Parcel FL-209, Former Southgate Oil, 23428 Pacific Highway South, Kent, Washington* dated September 21, 2018 prepared by GeoEngineers (2018b);
- *Supplemental Focused Subsurface Investigation Report, 23418 Pacific Highway South, Kent, Washington* dated March 3, 2019, prepared by ECI (2019a); and
- *Cleanup Action Report, Affected Property, 23418 Pacific Highway South, Kent, WA, Source Property: 23428 Pacific Highway South, Kent, WA, Site: Southgate Oil Site, Facility/Site ID: 84946863* dated December 31, 2019, prepared by ECI (2019b).

All of these reports (listed in Attachment B) were provided to Ecology in the VCP Application dated November 23, 2020.

SUBSURFACE INVESTIGATIONS

Focused Subsurface Investigation Report (ECI 2017)

ECI (2017) conducted a subsurface investigation on the Muscatel Midway Property in November 2017 to evaluate for potential impacts from historical operations on the Muscatel Midway Property and the south-adjacent property at 23428 Pacific Highway South (Former Southgate Oil Property).

ECI (2017) documented that soil with concentrations of TPH exceeding MTCA Method A cleanup levels was excavated from the south-adjacent Former Southgate Oil Property in 2002. Following completion of the cleanup action on the Former Southgate Oil Property, a No Further Action (NFA) determination was not issued by Ecology (ECI 2017).



The ECI (2017) subsurface investigation identified potential impacts from historical operations in the following areas of the Muscatel Midway Property (Figure 1):

- Area 1: Western portion of the Muscatel Midway Property where a suspected former service station operated;
- Area 2: North-adjacent to the existing Muscatel Midway Property building where a former dry cleaner operated; and
- Area 3: Southern portion of the Muscatel Midway Property adjacent to the Former Southgate Oil Property.

The subsurface investigation included advancing a total of 12 borings (Borings B1 through B10, B12, and B13) (Figure 1) to depths ranging from 7 to 12 feet bgs. Groundwater was not encountered to the total depth explored of 12 feet bgs. DRO and GRO were detected at concentrations exceeding MTCA Method A cleanup levels in the soil sample collected at a depth of 8 feet bgs from boring B13, which was advanced along the southern property boundary of the Muscatel Midway Property (Figure 1). DRO, GRO, and the other COCs were not detected at concentrations exceeding MTCA Method A cleanup levels in the other soil samples collected at the Muscatel Midway Property. Based on the results of the subsurface investigation, ECI (2017) concluded that source of DRO and GRO at concentrations exceeding MTCA Method A cleanup levels in soil at the southern property boundary appeared to be from the south-adjacent Former Southgate Oil Property.

Phase II Environmental Site Assessment Report, Sound Transit-Federal Way Link Extension, Parcel FL-207, Former Dry Cleaner and Service Station (Muscatel Midway Property) (GeoEngineers 2018a)

GeoEngineers (2018a) conducted a subsurface investigation of the Muscatel Midway Property in July 2018 as part of the expansion work associated with Sound Transit's Federal Way Link Extension. GeoEngineers (2018a) advanced 13 borings (FL207-B14 through FL207-B25) to evaluate subsurface conditions for potential impacts on the Muscatel Midway Property at the areas previously investigated by ECI (2017) and along the eastern portion of the Muscatel Midway Property (Figure 2). The borings were advanced to depths ranging from 8 to 31 feet bgs. Groundwater was not encountered to the total depth explored of 31 feet bgs. DRO, ORO, and benzene were detected at concentrations exceeding MTCA Method A cleanup levels in soil along the southern portion of the Muscatel Midway Property at the following borings (Figure 2):

- Boring FL207-B16 (ORO at 2.5 to 3.5 feet bgs);
- Boring FL207-B18 (DRO at 0.5 to 1.0 feet bgs); and
- Boring FL207-B22 (benzene at 2.5 to 3.5 feet bgs).

GeoEngineers (2018a) concluded that the source of ORO detected in the soil sample collected from boring FL207-B16 was likely attributed to a surface release of lube oil associated with truck or vehicle traffic on the Muscatel Midway Property. GeoEngineers (2018a) indicated that there



was not an obvious source for the low concentration of benzene detected in boring FL207-B22. GeoEngineers (2018a) identified the south-adjacent Former Southgate Oil Property as the likely source for DRO and GRO at concentrations exceeding MTCA Method A cleanup levels in soil samples collected from boring FL207-B18.

Phase II Environmental Site Assessment Report, Sound Transit-Federal Way Link Extension, Parcel FL-209, Former Southgate Oil (GeoEngineers 2018b)

GeoEngineers (2018b) documented that the cleanup action conducted by others in 2000 and 2002 at the south-adjacent Former Southgate Oil Property included excavation of approximately 1,119 tons of soil with concentrations of TPH exceeding MTCA Method A cleanup levels. The analytical results for soil samples collected from the base and sidewalls of the 2002 excavation detected DRO at a concentration exceeding the MTCA Method A Soil Cleanup Level on the north sidewall at a depth of 10 feet bgs at the property boundary shared with the Muscatel Midway Property (Figure 3).

GeoEngineers (2018b) conducted a subsurface investigation at the Former Southgate Oil Property in June and July 2017 that include the advancement of 12 borings to depths ranging from 11 to 30.5 feet bgs (Figure 3). Groundwater was not encountered during advancement of the borings. The results of the subsurface investigation conducted by GeoEngineers (2018b) confirmed that the prior cleanup action work on the Former Southgate Oil Property was not completed to the maximum extent practicable and that soil with concentrations of TPH exceeding MTCA Method A cleanup levels remain at a depth of 14 feet bgs along the shared property boundary of the Former Southgate Oil Property and the Muscatel Midway Property (Figure 3).

Supplemental Focused Subsurface Investigation Report (ECI 2019a)

Subsequent to the soil removal conducted at the Muscatel Midway Property in January 2019 (as documented in ECI 2019b and discussed below), ECI (2019a) conducted additional investigation at the Muscatel Midway Property in February 2019, which included excavation of four test pits at previous borings FL207-B16, FL207-B18, and FL207-B22 where COCs were detected at concentrations exceeding MTCA Method A cleanup levels in soil (Figure 4). The test pits included:

- Test Pit 1: At previous boring FL207-B16 and measuring approximately 6.0 feet wide by 3.0 feet long and 4.0 feet deep;
- Test Pit 2: At previous boring FL207-B18 and measuring approximately 9.0 feet wide by 2.0 feet long and 1.5 feet deep;
- Test Pit 3: Proximate to previous boring FL207-B22 and measuring approximately 12.6 feet wide by 8.3 feet long and 1.0 to 4.0 feet deep; and
- Test Pit 3.2: At previous boring FL207-B22 and measuring approximately 3.4 feet wide by 2.3 feet long and 3.5 feet deep.



GRO was detected at a concentration exceeding the MTCA Method A cleanup level in soil sample TP3-S-0, collected at the ground surface from Test Pit 3 (Figure 5). ECI noted that benzene was not detected; however, the laboratory reporting limit for benzene in soil sample TP3-S-0 was 1 milligram per kilogram, which exceeds the MTCA Method A cleanup level (Figure 4). ECI (2019a) subsequently excavated soil near soil sample TP3-S-0 and collected soil samples to delineate the nature and extent of GRO and benzene exceeding MTCA Method A cleanup levels in soil. The excavated soil was transported to the Republic Services Inc's 3rd and Lander Reload Facility in Seattle, Washington (Lander Reload Facility) for transfer and disposal at the Roosevelt Regional Municipal Solid Waste Landfill in Roosevelt, Washington (Roosevelt Regional Landfill). The excavation was backfilled with imported fill and repaved with asphalt.

ECI (2019a) backfilled Test Pits 1, 2, and 3.2 with the original soil removed during the excavation activities and repaved with asphalt. A total of 19 confirmation soil samples were collected from the limits of the excavations for Test Pits 1 through 3.2. The analytical results for the soil samples indicated that soil with concentrations of COCs exceeding applicable MTCA Method A cleanup levels had been removed from the Muscatel Midway Property (2019a).

Supplemental Focused Subsurface Investigation Report (ECI 2019b)

ECI (2019b) conducted a cleanup action at the Muscatel Midway Property in January 2019. Approximately 166 tons of soil with concentrations of COCs exceeding MTCA Method A cleanup levels was excavated from a 36 feet wide by 18 feet long and 13 to 15 feet deep excavation adjacent to previous boring B13 along the southern portion of the Muscatel Midway Property (Figures 6 through 8). Groundwater was not encountered during the excavation activities. Excavated soil was transported to the Lander Reload Facility for transfer to and disposal at the Roosevelt Regional Landfill. The excavation was backfilled with imported fill and repaved with asphalt.

COCs were not detected at concentrations exceeding MTCA Method A cleanup levels in a total of 14 confirmation soil samples collected from the final limits of the excavation (Figures 7 and 8). However, field observations noted by ECI (2019b) during the excavation activities indicated that soil with a "blue-gray staining and associated petroleum-like odor" remained in-place beneath the retaining wall along the southern property boundary between the Muscatel Midway Property and the south-adjacent Former Southgate Oil Property (Figures 6 through 8). ECI (2019b) did not collect soil samples along the southern property boundary from the soil with the noted staining and petroleum-like odor.

Subsequent to the investigation conducted by ECI (2018a) in February 2019, ECI (2019b) conducted additional characterization at the Muscatel Midway Property in September 2019. The purpose of the additional characterization was to further evaluate the extent of soil with the blue-gray staining and associated petroleum-like odor that was identified beneath the retaining wall along the shared property boundary between the Muscatel Midway Property and the south-adjacent Former Southgate Oil Property during the cleanup action activities conducted by ECI in January 2019 (Figures 6 through 8) (ECI 2019b).



As part of the additional characterization, ECI excavated a 14.0 feet wide by 4.0 feet long and 11.0 feet deep trench adjacent to the retaining wall on the southern property boundary. Groundwater was not encountered during the excavation activities. A total of six soil samples were collected from the southern excavation wall of the trench (Figure 8). DRO and GRO were detected at concentrations exceeding MTCA Method A cleanup levels in three of the soil samples at depths ranging from 6.5 to 11 feet bgs (Figure 8). DRO, ORO, and other COCs were not detected at concentrations exceeding MTCA Method A cleanup levels in the remaining soil samples collected by ECI (2019b).

Excavation of the soil with concentrations of COCs exceeding the applicable MTCA Method A cleanup levels was not conducted by ECI due to the potential of undermining the retaining wall foundation (ECI 2019b). A 14-millimeter polyvinyl chloride liner was placed along the south sidewall of the excavation prior to backfilling to prevent recontamination of soil on the Muscatel Midway Property. The trench excavation was backfilled with the original excavated material and repaved with asphalt (ECI 2019b).

The cleanup actions conducted in January and February 2019 removed soil with concentrations of COCs exceeding the applicable MTCA Method A cleanup levels to the maximum extent practicable at the Muscatel Midway Property. Groundwater was not encountered to a total depth of 31 feet bgs during the subsurface investigations conducted at the Muscatel Midway Property and COCs were not detected at concentrations exceeding MTCA Method A cleanup levels in the confirmation soil samples collected from the base of the test pits and excavation. Therefore, groundwater is not a media of concern for the Muscatel Midway Property.

Terrestrial Ecological Evaluation

A Terrestrial Ecological Evaluation (TEE) is required by Chapter 173-340 of the Washington Administrative Code (WAC 173-340) at any site where there has been a release of hazardous substances to soil. The regulation requires that one of the following actions be taken:

- Document a TEE exclusion using the criteria presented in WAC 173-340-7491;
- Conduct a simplified TEE in accordance with WAC 173-340-7492; or
- Conduct a site-specific TEE in accordance with WAC 173-340-7493.

Based on the criteria for TEE exclusion in WAC 173-340-7491(1)(c)(i), the Muscatel Midway Property is excluded from a TEE because there is less than 1.5 acres of contiguous undeveloped land on the Muscatel Midway Property or within 500 feet of any area of the Muscatel Midway Property, and the Muscatel Midway Property is not contaminated with any of the hazardous substances listed in WAC 173-340-7491(1)(c)(ii). An aerial image showing a 500-foot buffer proximate to the Muscatel Midway Property is shown on Figure 9. No further consideration of terrestrial ecological impacts is required under MTCA. The Ecology *Terrestrial Ecological Evaluation Form* completed for the Muscatel Midway Property is provided in Attachment A.



The cleanup actions conducted at the Muscatel Midway Property complies with the cleanup standards and meets the substantive requirements of MTCA for a remedial action as established in WAC 173-340 for an NFA determination by demonstrating that the action protects human health and the environment and is protective of terrestrial ecological receptors. Based on the results of the subsurface investigations and cleanup actions, Farallon requests that an NFA determination and associated environmental covenant be issued by Ecology for the Muscatel Midway Property.

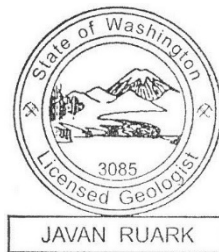
CLOSING

Farallon trusts that the provided documentation is sufficient information to meet the requirements for issuance of an NFA determination with associated environmental covenant for the Muscatel Midway Property. Farallon is available to meet with Ecology to further discuss this request for an NFA determination, if necessary. Please contact the undersigned at (425) 295-0800 if you have questions or require additional information.

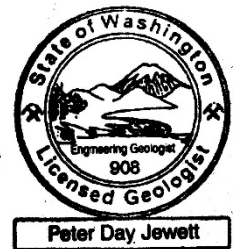
Sincerely,

Farallon Consulting, L.L.C.

Javan Ruark, L.G.
Associate Geologist



Peter Jewett, L.G., L.E.G.
Principal Engineering Geologist



Attachments: Figure 1, *Sample Collection Location Map*
Figure 2, *Site Plan and Boring Locations, FL-207*
Figure 3, *Site Plan and Boring Location Map, FL-209*
Figure 4, *Previous Sample Locations Map*
Figure 5, *Test Pit 3 Map*
Figure 6, *Site Plan*
Figure 7, *Cross Section A'-A*
Figure 8, *Cross-Section B-B'*
Figure 9, *Terrestrial Ecological Evaluation, 500-Foot Buffer Radius*
Attachment A, *Terrestrial Ecological Evaluation*
Attachment B, *References*

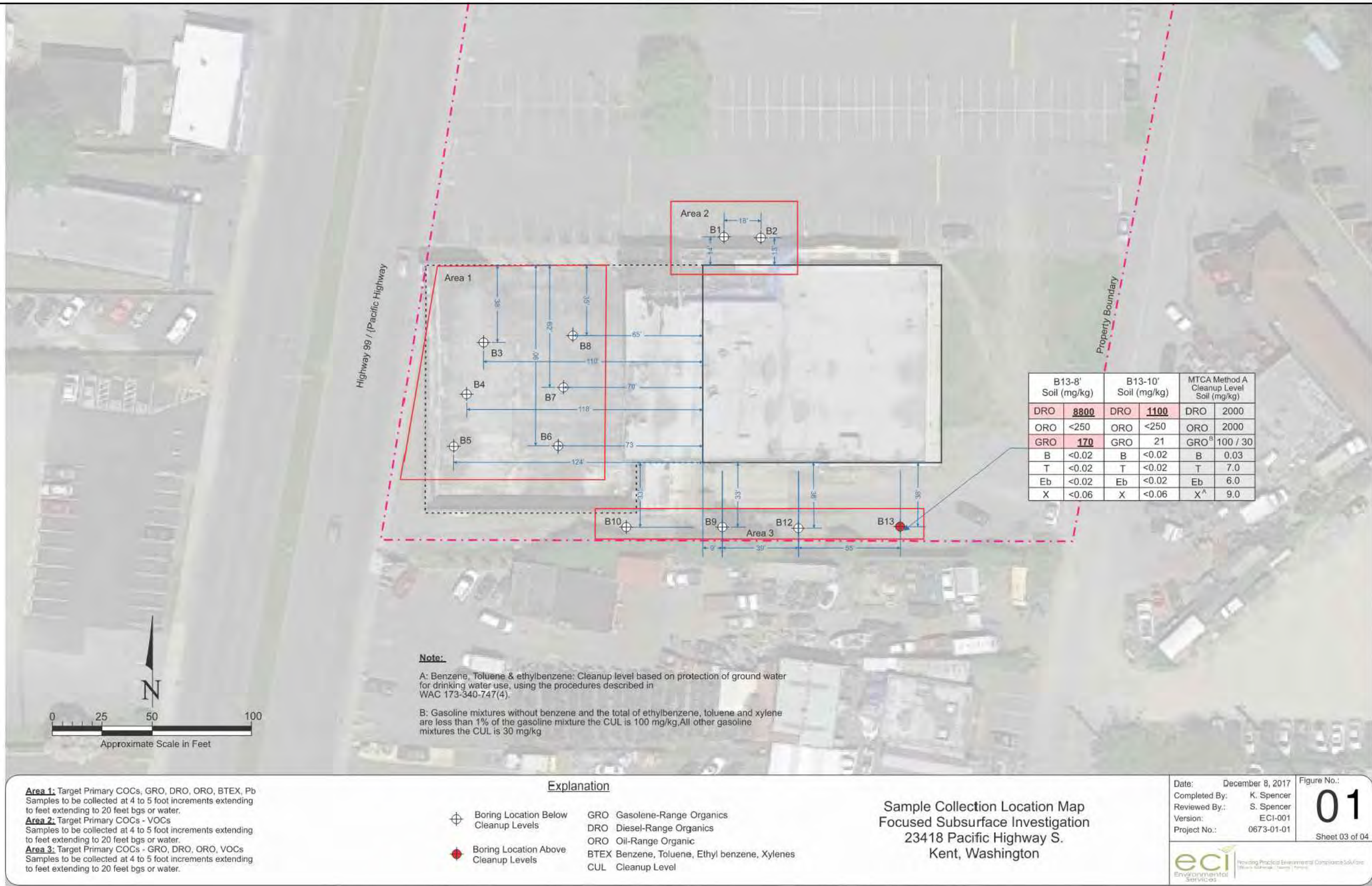
JR/PJ:mbg

FIGURES

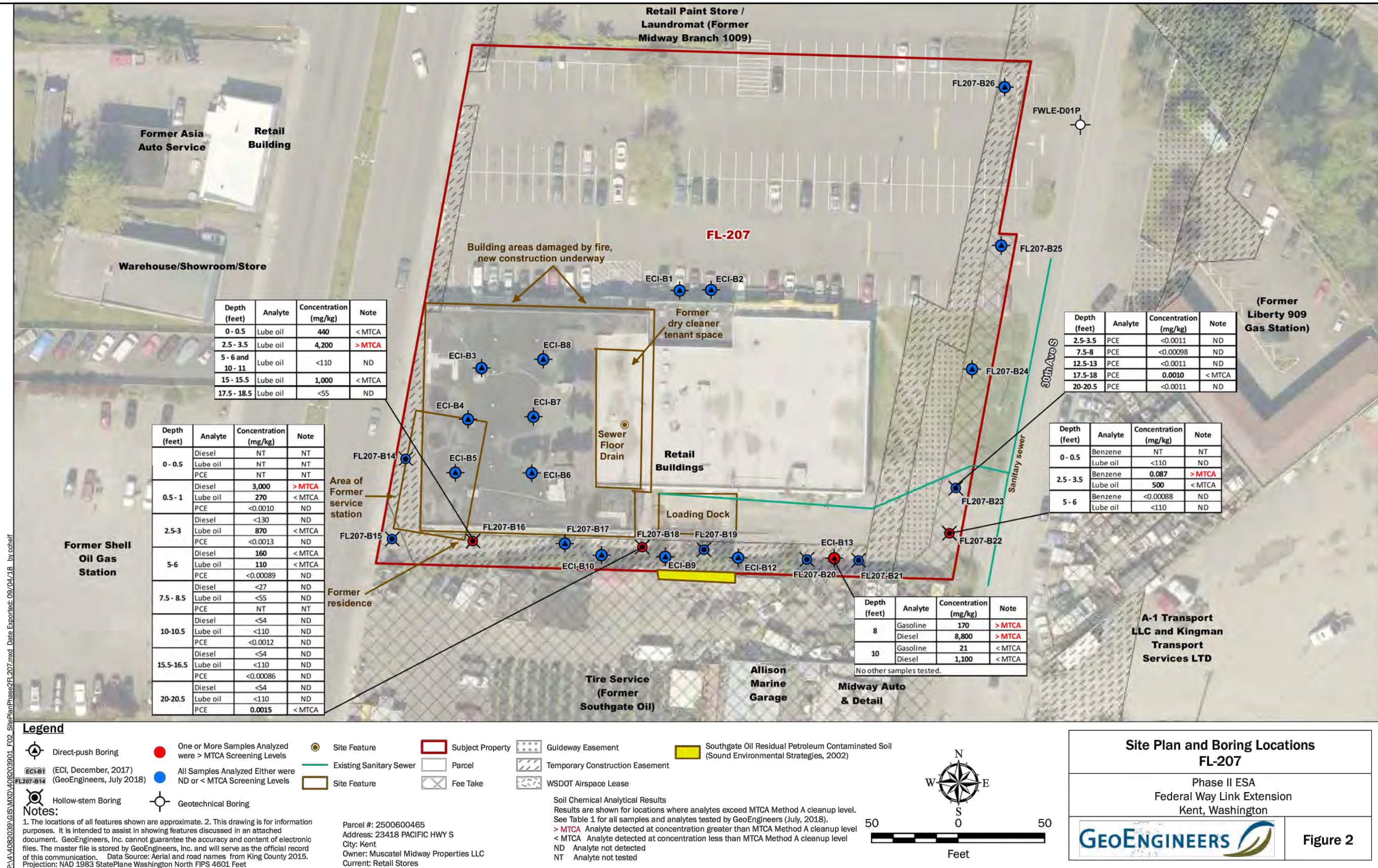
SUMMARY REPORT SUBSURFACE INVESTIGATIONS AND CLEANUP ACTION

**Muscatel Midway Property
23418 Pacific Highway South
Kent, Washington**

Farallon PN: 2532-001



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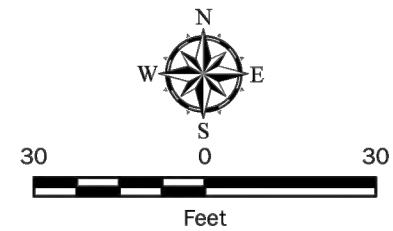
Legend

- Hollow-stem Boring
- One or More Samples Analyzed were > MTCA Screening Levels
- All Samples Analyzed Either were ND or < MTCA Screening Levels
- Site Feature
- Subject Property
- Parcel
- Approximate Previous UST and Remedial Excavation Locations

Notes:

1. Based on current design information for the FWLE project (HDR, provided in June 2017)
2. The locations of all features shown are approximate. 3. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.
Data Source: Aerial and road names from King County 2015.

Parcel #: 2500600480
Address: 23428 PACIFIC HWY S
City: Kent
Owner: CASTANEDA, JUAN & ROJAS
Current Use: retail store



Site Plan and Boring Location Map FL-209

Phase II ESA
Federal Way Link Extension
Washington



Figure 3



Drawn By: NM Checked By: JR

FIGURE 3

SITE PLAN AND BORING LOCATIONS FL-209
MUSCATEL PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON

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Approximate Scale In feet

Explanation

- △ Soil Sample Location
- ⊗ GeoEngineers Sample Locations
- ECI Test Pit Locations

Previous Sample Locations Map
Supplemental Focused Subsurface Investigation
23418 Pacific Hwy S
Kent, WA 98032

Date:	March 5, 2019	Figure No.:
Completed By:	K. Spencer	04
Reviewed By:	S. Spencer	
Version:	ECI-001	
Project No.:	0673-01-02	Sheet 04 of 05

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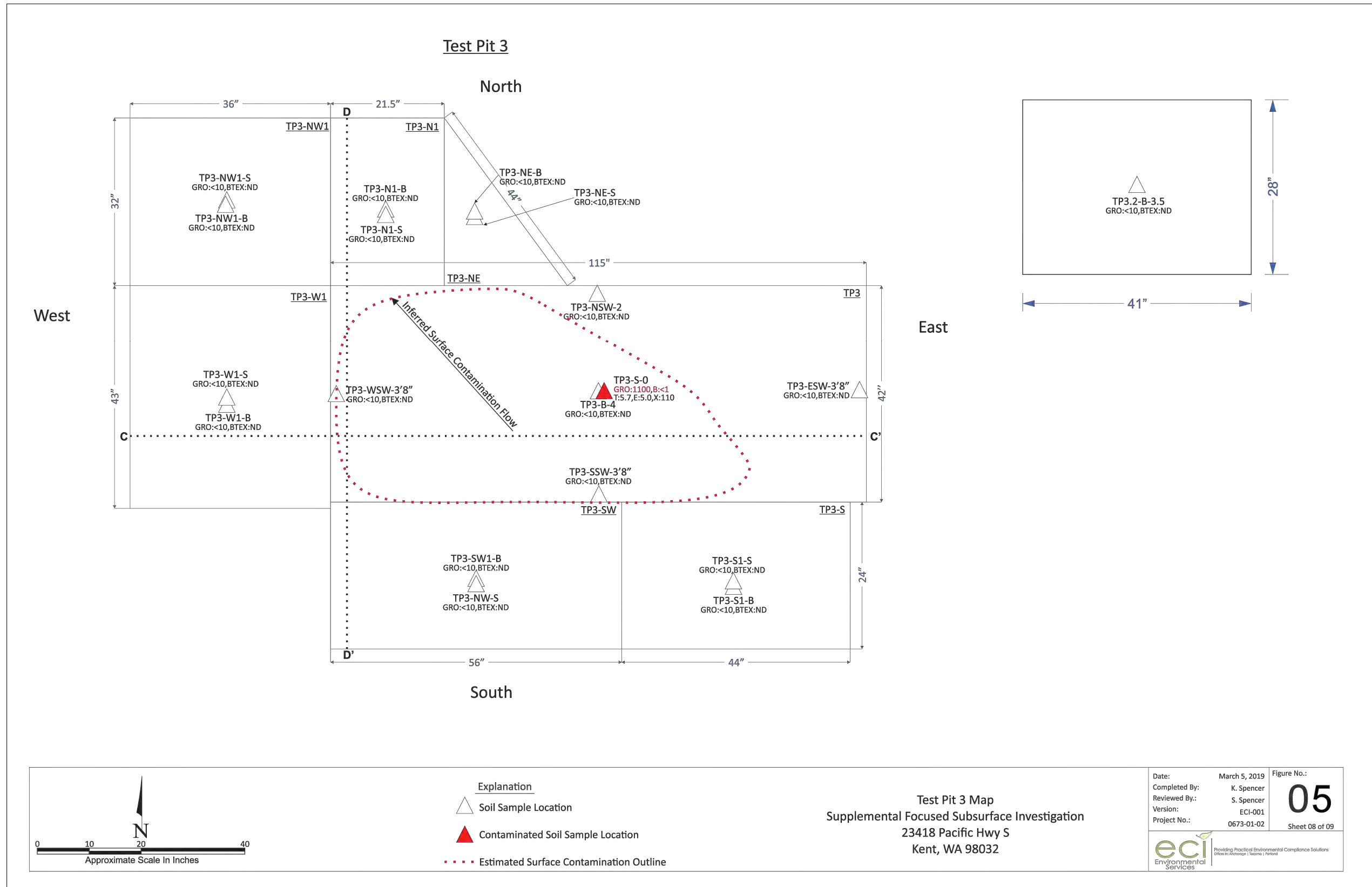
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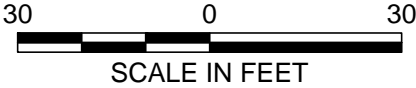
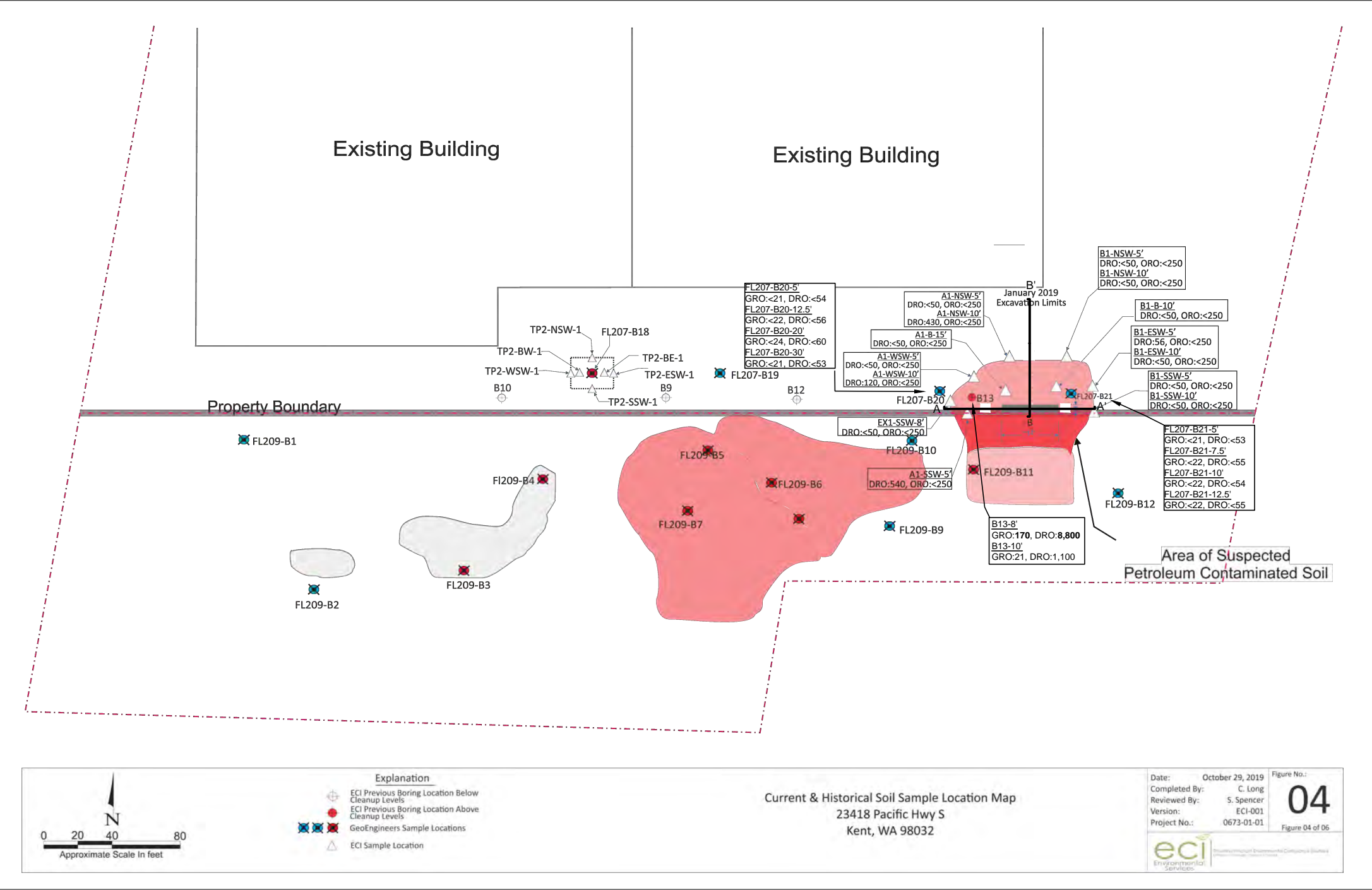
FIGURE 4

PREVIOUS SAMPLE LOCATIONS MAP
MUSCATEL PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON

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NOTES:
DATA FOR FL207-B20 AND FL207-B21 IS FROM JULY 2018 BY GEOENGINEERS
DATA FOR ECI-B13 IS FROM DECEMBER 2017 BY ECI



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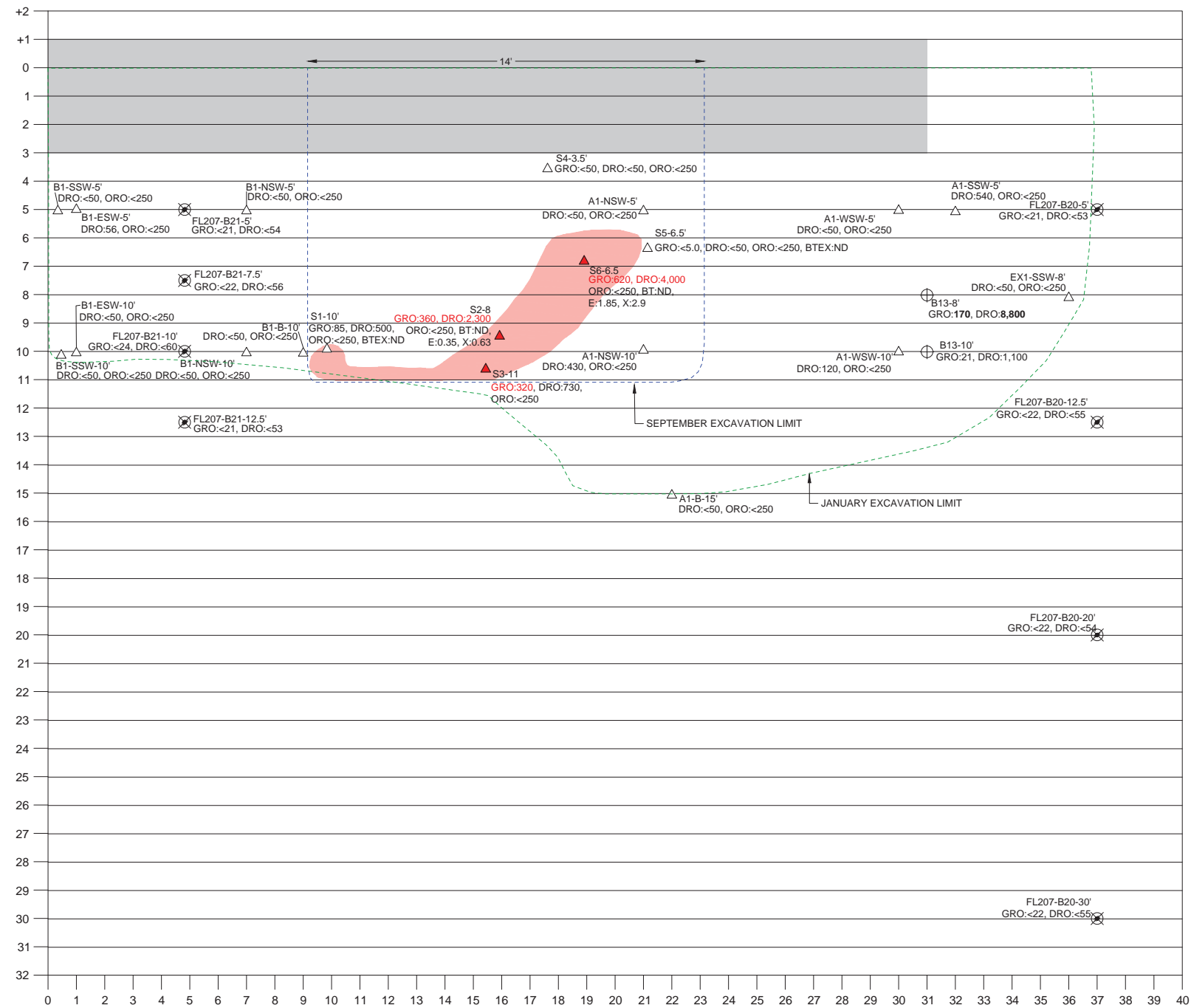
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Drawn By: NM Checked By: JR

FIGURE 6
SITE PLAN
MUSCATEL PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON

E(A') REMEDIAL EXCAVATION CROSS SECTION LOOKING SOUTH W(A)



2.5' 0 2.5'
SCALE IN FEET

NOTES:
DATA FOR FL207-B20 AND FL207-B21 IS FROM JULY 2018 BY GEOENGINEERS
DATA FOR ECI-B13 IS FROM DECEMBER 2017 BY ECI

Explanation	
△ Soil Sample Location	GRO: Gasoline Range Organics
□ September Excavation Limit	DRO: Diesel Range Organics
△ Sample Above Cleanup Level	ORO: Oil Range Organics
□ January Excavation Limit	□ Concrete Wall/Footing
	— September Excavation Limit
	B: Benzene
	T: Toluene
	E: Ethyl Benzene
	X: Total Xylene

Cross-Section of Remedial Action
Cleanup Action Report
23418 Pacific Hwy S
Kent, WA 98032

Date:	October 22, 2018	Figure no.:
Submitted By:	C. Long	06
Reviewed By:	S. Spencer	
Version:	10-001	
Project No.:	0275-01-04	Figure 6 of 7



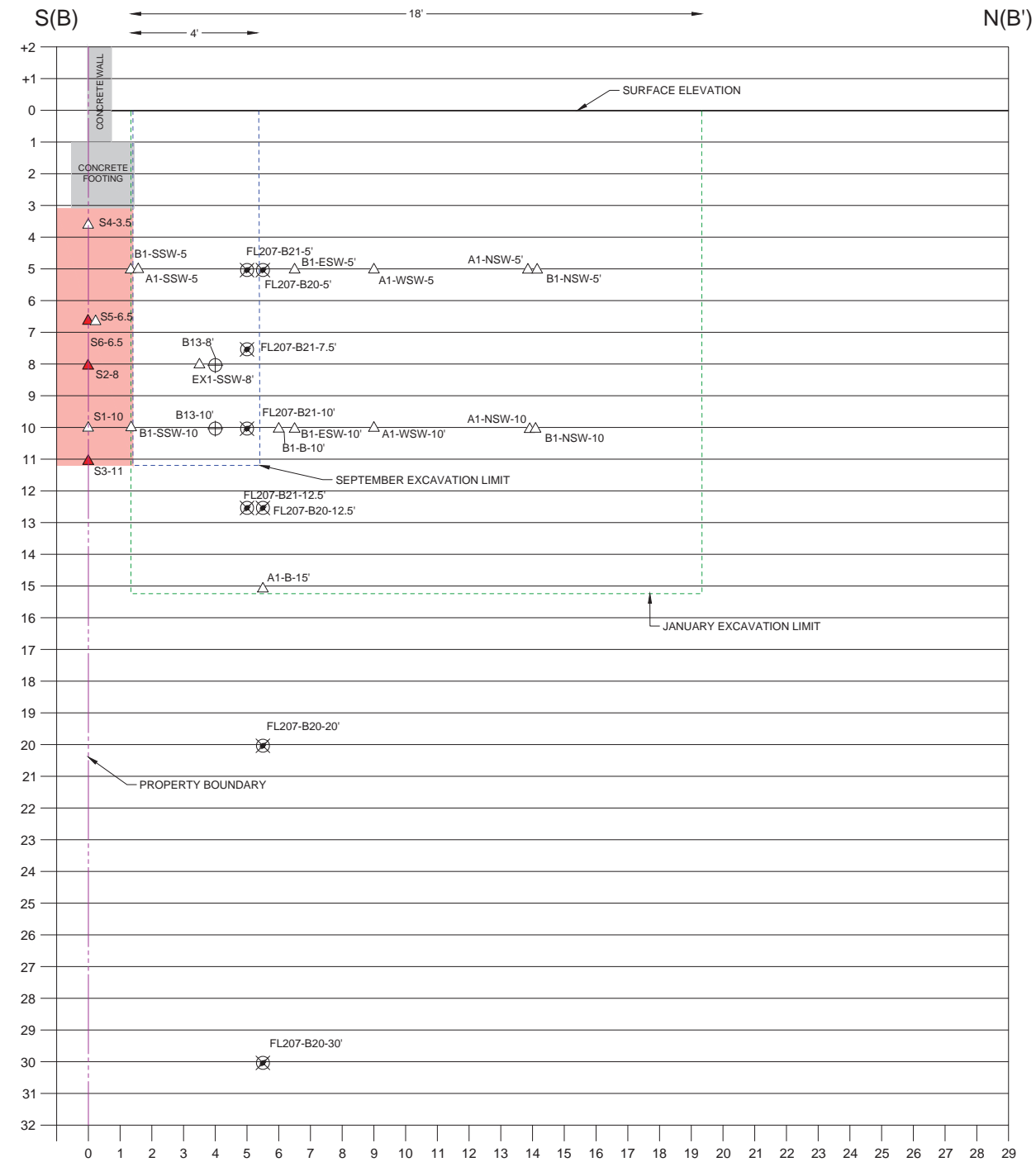
Drawn By: NM Checked By: JR

Date: 1/19/2021

FIGURE 7
CROSS SECTION A'-A
MUSCATEL PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON

FARALLON PN-2532-001

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2.5' 0 2.5'

SCALE IN FEET

Explanation

△ Soil Sample Location

▲ Sample Above Cleanup Level

□ September Excavation Limit

— Property Boundary

■ Contaminated Soil

□ January Excavation Limit

■ Barrier

Cross-Section of Remedial Action
Cleanup Action Report
23418 Pacific Hwy S
Kent, WA 98032

Date: October 22, 2018
Completed By: C. Long
Reviewed By: S. Spencer
Version: ECI-001
Project No.: 0613-01-04

Figure No.: 05

Figure 5 of 6

eci
Environmental Consulting Inc.

NOTES:
DATA FOR FL207-B20 AND FL207-B21 IS FROM JULY 2018 BY GEOENGINEERS
DATA FOR ECI-B13 IS FROM DECEMBER 2017 BY ECI

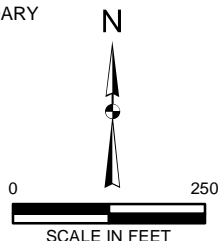


FIGURE 8
CROSS SECTION B-B'
MUSCATEL PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON
FARALLON PN-2532-001



LEGEND

- 500-FOOT ECOLOGICAL BUFFER
- PROPERTY BOUNDARY



NOTES:

1. ALL LOCATIONS ARE APPROXIMATE
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.



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FIGURE 9

TERRESTRIAL ECOLOGICAL EVALUATION
500-FOOT BUFFER RADIUS
MUSCATEL PROPERTY
23418 PACIFIC HIGHWAY SOUTH
KENT, WASHINGTON
FARALLON PN: 2532-001

Drawn By: ijones

Checked By: JR

Date: 12/28/2020

Disc Reference:

Path: Q:\Projects\2532 Muscatel Midway Properties\001 Muscatel Property\Mapfiles\002_VCP\Figure-01_TEE_Boundary.mxd

ATTACHMENT A
TERRESTRIAL ECOLOGICAL EVALUATION

**SUMMARY REPORT SUBSURFACE INVESTIGATIONS
AND CLEANUP ACTION**

Muscatel Midway Property
23418 Pacific Highway South
Kent, Washington

Farallon PN: 2532-001



Voluntary Cleanup Program

Washington State Department of Ecology Toxics Cleanup Program

TERRESTRIAL ECOLOGICAL EVALUATION FORM

Under the Model Toxics Control Act (MTCA), a terrestrial ecological evaluation is necessary if hazardous substances are released into the soils at a Site. In the event of such a release, you must take one of the following three actions as part of your investigation and cleanup of the Site:

1. Document an exclusion from further evaluation using the criteria in WAC 173-340-7491.
2. Conduct a simplified evaluation as set forth in WAC 173-340-7492.
3. Conduct a site-specific evaluation as set forth in WAC 173-340-7493.

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation.

Completion of this form is not sufficient to document your evaluation. You still need to document your analysis and the basis for your conclusion in your cleanup plan or report.

If you have questions about how to conduct a terrestrial ecological evaluation, please contact the Ecology site manager assigned to your Site. For additional guidance, please refer to www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are documenting an evaluation.

Facility/Site Name:

Facility/Site Address:

Facility/Site No:

VCP Project No.:

Step 2: IDENTIFY EVALUATOR

Please identify below the person who conducted the evaluation and their contact information.

Name:

Title:

Organization:

Mailing address:

City:

State:

Zip code:

Phone:

Fax:

E-mail:

Step 3: DOCUMENT EVALUATION TYPE AND RESULTS

A. Exclusion from further evaluation.

1. Does the Site qualify for an exclusion from further evaluation?

- ☐ Yes *If you answered "YES," then answer **Question 2**.*
- ☐ No or Unknown *If you answered "NO" or "UNKNOWN," then skip to **Step 3B** of this form.*

2. What is the basis for the exclusion? Check all that apply. Then skip to **Step 4** of this form.

Point of Compliance: WAC 173-340-7491(1)(a)

- ☐ All soil contamination is, or will be,* at least 15 feet below the surface.
- ☐ All soil contamination is, or will be,* at least 6 feet below the surface (or alternative depth if approved by Ecology), and institutional controls are used to manage remaining contamination.

Barriers to Exposure: WAC 173-340-7491(1)(b)

- ☐ All contaminated soil, is or will be,* covered by physical barriers (such as buildings or paved roads) that prevent exposure to plants and wildlife, and institutional controls are used to manage remaining contamination.

Undeveloped Land: WAC 173-340-7491(1)(c)

- ☐ There is less than 0.25 acres of contiguous# undeveloped± land on or within 500 feet of any area of the Site and any of the following chemicals is present: chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.
- ☐ For sites not containing any of the chemicals mentioned above, there is less than 1.5 acres of contiguous# undeveloped± land on or within 500 feet of any area of the Site.

Background Concentrations: WAC 173-340-7491(1)(d)

- ☐ Concentrations of hazardous substances in soil do not exceed natural background levels as described in WAC 173-340-200 and 173-340-709.

* An exclusion based on future land use must have a completion date for future development that is acceptable to Ecology.

± "Undeveloped land" is land that is not covered by building, roads, paved areas, or other barriers that would prevent wildlife from feeding on plants, earthworms, insects, or other food in or on the soil.

"Contiguous" undeveloped land is an area of undeveloped land that is not divided into smaller areas of highways, extensive paving, or similar structures that are likely to reduce the potential use of the overall area by wildlife.

B. Simplified evaluation.

1. Does the Site qualify for a simplified evaluation?

- ☐ Yes *If you answered "YES," then answer **Question 2** below.*
- ☐ No or Unknown *If you answered "NO" or "UNKNOWN," then skip to **Step 3C** of this form.*

2. Did you conduct a simplified evaluation?

- Yes *If you answered "YES," then answer **Question 3** below.*
- ☐ No *If you answered "NO," then skip to **Step 3C** of this form.*

3. Was further evaluation necessary?

- Yes *If you answered "YES," then answer **Question 4** below.*
- ☐ No *If you answered "NO," then answer **Question 5** below.*

4. If further evaluation was necessary, what did you do?

- ☐ Used the concentrations listed in Table 749-2 as cleanup levels. *If so, then skip to **Step 4** of this form.*
- ☐ Conducted a site-specific evaluation. *If so, then skip to **Step 3C** of this form.*

5. If no further evaluation was necessary, what was the reason? Check all that apply. Then skip to **Step 4** of this form.

Exposure Analysis: WAC 173-340-7492(2)(a)

- ☐ Area of soil contamination at the Site is not more than 350 square feet.
- ☐ Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.

Pathway Analysis: WAC 173-340-7492(2)(b)

- ☐ No potential exposure pathways from soil contamination to ecological receptors.

Contaminant Analysis: WAC 173-340-7492(2)(c)

- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.
- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations that exceed the values listed in Table 749-2, and institutional controls are used to manage remaining contamination.
- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays.
- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, and institutional controls are used to manage remaining contamination.

C. Site-specific evaluation. A site-specific evaluation process consists of two parts: (1) formulating the problem, and (2) selecting the methods for addressing the identified problem. Both steps require consultation with and approval by Ecology. See WAC 173-340-7493(1)(c).

1. Was there a problem? See WAC 173-340-7493(2).

- ☐ Yes *If you answered “YES,” then answer **Question 2** below.*
- ☐ No *If you answered “NO,” then identify the reason here and then skip to **Question 5** below:*
- ☐ No issues were identified during the problem formulation step.
- ☐ While issues were identified, those issues were addressed by the cleanup actions for protecting human health.

2. What did you do to resolve the problem? See WAC 173-340-7493(3).

- ☐ Used the concentrations listed in Table 749-3 as cleanup levels. *If so, then skip to **Question 5** below.*
- ☐ Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate and address the identified problem. *If so, then answer **Questions 3 and 4** below.*

3. If you conducted further site-specific evaluations, what methods did you use?

Check all that apply. See WAC 173-340-7493(3).

- ☐ Literature surveys.
- ☐ Soil bioassays.
- ☐ Wildlife exposure model.
- ☐ Biomarkers.
- ☐ Site-specific field studies.
- ☐ Weight of evidence.
- ☐ Other methods approved by Ecology. If so, please specify:

4. What was the result of those evaluations?

- ☐ Confirmed there was no problem.
- ☐ Confirmed there was a problem and established site-specific cleanup levels.

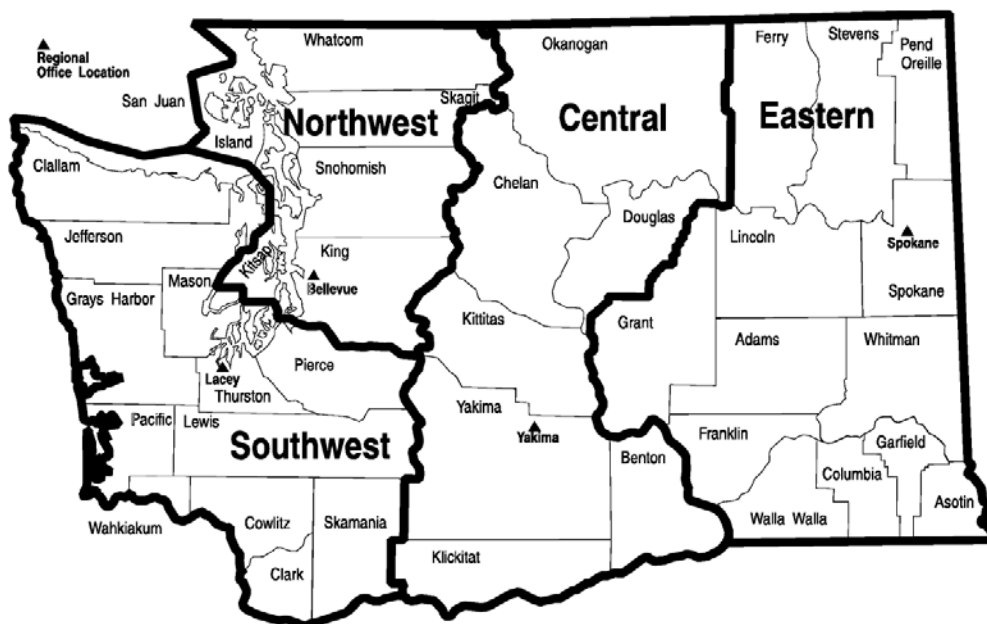
5. Have you already obtained Ecology’s approval of both your problem formulation and problem resolution steps?

- ☐ Yes If so, please identify the Ecology staff who approved those steps:
- ☐ No

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.

Northwest Region: Attn: VCP Coordinator 3190 160 th Ave. SE Bellevue, WA 98008-5452	Central Region: Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009
Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775	Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295



**ATTACHMENT B
REFERENCES**

SUMMARY REPORT SUBSURFACE INVESTIGATIONS
AND CLEANUP ACTION
Muscatel Midway Property
23418 Pacific Highway South
Kent, Washington

Farallon PN: 2532-001

REFERENCES

- ECI Environmental Services (ECI). 2017. *Focused Subsurface Investigation Report*, 23418 Pacific Highway South, Kent, Washington. Prepared for Muscatel Midway Properties LLC. December 18.
- . 2019a. *Supplemental Focused Subsurface Investigation Report*, 23418 Pacific Highway South, Kent, Washington. Prepared for Muscatel Midway Properties LLC. March 3.
- . 2019b. *Cleanup Action Report*, Affected Property, 23418 Pacific Highway South, Kent, WA, Source Property: 23428 Pacific Highway South, Kent, WA, Site: Southgate Oil Site, Facility/Site ID: 84946863. Prepared for Muscatel Midway Properties LLC. December 31.
- GeoEngineers, Inc. (GeoEngineers). 2018a. *Phase II Environmental Site Assessment Report, Sound Transit-Federal Way Link Extension, Parcel FL-207, Former Dry Cleaner and Service Station, 23418 Pacific Highway South, Kent, Washington*. Prepared for Sound Transit, Inc. September 21.
- . *Phase II Environmental Site Assessment Report, Sound Transit-Federal Way Link Extension, Parcel FL-209, Former Southgate Oil, 23428 Pacific Highway South, Kent, Washington*. Prepared for Sound Transit, Inc. September 21.