



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 17, 2021

Siri Long
Principal Real Estate Investors
801 Grand Avenue
Des Moines, IA 50392

Re: No Further Action at the following Site:

- **Site Name:** Bellevue Chrysler Plymouth
- **Site Address:** 126 116th Avenue, Bellevue, Washington
- **Facility/Site No.:** 2507
- **VCP Project No.:** NW 3226

Dear Siri Long:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Bellevue Chrysler Plymouth facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively “substantive requirements of MTCA”). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Diesel and oil into the soil and groundwater

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Due to a complex series of changes of name and ownership, this site is also related to the adjoining Dodge of Bellevue site (NW 3091) (now Bellevue North).

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. Remedial Action Plan – Bellevue Chrysler Plymouth – 126 116th Avenue NE – Bellevue, Washington by Northwest Geotech and dated July 31, 1996
2. Groundwater Monitoring Report - Bellevue Chrysler Plymouth – 126 116th Avenue NE – Bellevue, Washington by Northwest Geotech and dated October 18, 1996
3. Groundwater Monitoring Report - Bellevue Chrysler Plymouth – 126 116th Avenue NE – Bellevue, Washington by Northwest Geotech and dated September 1, 2000
4. Phase I Environmental Site Assessment for Dodge of Bellevue Property – 126 through 316 116th Avenue NE – Bellevue, Washington by SCS Engineers and dated September 16, 2005
5. Updated Phase I Environmental Site Assessment for Dodge of Bellevue Property – 126 through 316 116th Avenue NE – Bellevue, Washington by SCS Engineers and dated April 28, 2006
6. Phase I Environmental Site Assessment – Former Dodge of Bellevue & Eastside Chrysler Jeep Property – 126 – 400 116th Avenue NE – Bellevue, Washington by SCS Engineers and date July 1, 2015
7. Phase I Environmental Site Assessment Report – Bellevue South – 200 116th Avenue Northeast – Bellevue, Washington by Farallon Consulting and dated September 29, 2017
8. Contaminated Media Management Plan – Bellevue South Project (Formerly Eastside Chrysler Jeep Site) - 126 – 200 116th Avenue NE – Bellevue, Washington by SCS Engineers and dated May 23, 2018
9. Supplemental Remedial Investigation and Soil Cleanup Report – Former Bellevue Chrysler Plymouth Site at the Bellevue South Project – 126 and 200 116th Avenue NE – Bellevue, Washington by SCS Engineers and dated March 19, 2019
10. Groundwater Monitoring Wells and Historical Site Features (figure) – Former Bellevue Chrysler Plymouth – 126 116th Avenue – Bellevue, Washington by SCS Engineers and dated June, 2019
11. Bellevue Chrysler Plymouth laboratory results by On-Site Environmental and dated June 13, 2019

12. Bellevue Chrysler Plymouth Figure 1 – Groundwater Monitoring Wells by SCS Engineers and dated June 2019
13. Bellevue Plymouth Chrysler Laboratory Data by On-Site Environmental and dated December 9, 2019
14. Bellevue Plymouth Chrysler Laboratory Data – Part 2 by On-Sight Environmental and dated December 19, 2019
15. Post Remedial Groundwater Monitoring Report – Former Bellevue Chrysler Plymouth Site – at the Bellevue South Project – 126 and 200 116th Avenue NE – Bellevue, Washington by SCS Engineers and dated October 5, 2020

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7024 or sending an email to nwro_public_request@ecy.wa.gov.

All of the documents are also available on Ecology's web page:

<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=5127>

Use the right hand panel to access (open) electronic documents.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

There has been extensive site characterization at this site. A list of 22 separate documents may be found in Exhibit 1 of Supplemental Remedial Investigation and Soil Cleanup Report by SCS Engineers and dated March 19, 2019 (reference 9 in the above list). A summary of some of the site characterization follows:

In June of 1988, a pit and one soil boring were installed on the site. Ethylbenzene (64 and 27 µg/Kg) and xylene (420 and 140 µg/Kg) were detected in the soil samples.

In the early 1990's, thirty-two soil borings were installed on site. Fifteen of the soil borings were subsequently converted to groundwater monitoring wells. Soil samples from the soil borings were analyzed for total petroleum hydrocarbons, metals, semi-

volatile organics, and volatile organic compounds with not all samples analyzed for all analytes. Total petroleum hydrocarbons were detected in six soil borings at concentrations exceeding the cleanup standard. All other analytes were either not detected or had concentrations below their respective cleanup standards. Between December of 1993 and June of 1996, groundwater samples were collected from various combinations of groundwater monitoring wells and analyzed for total petroleum hydrocarbons, benzene, ethylbenzene, toluene, xylene, volatile and semi-volatile organic compounds. With the exception of four detections of total petroleum hydrocarbons and two detections of bis(2 ethylhexyl) phthalate, all other groundwater samples either had no detections of any analyte or had concentrations that were below their respective cleanup standards.

In September of 1996, groundwater samples were collected from six groundwater wells and analyzed for total petroleum hydrocarbons and volatile organic compounds. There were no exceedances of any analyte in any groundwater sample.

From June of 1997 to July of 2000, nine groundwater monitoring wells were sampled in six rounds of sampling with the samples analyzed for volatile organic compounds. Except for one detection of benzene in one well and one detection of 1,2-dichloropropane in a second well, there were no exceedances of any analyte in any sampling round.

In March of 2018, twelve additional soil borings were installed on the site. One soil sample was collected from each soil boring and analyzed for total petroleum hydrocarbons. Six soil samples were also analyzed for gasoline, benzene, ethylbenzene, toluene, xylene, volatile organic compounds, and metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). There were no detections of gasoline, benzene, ethylbenzene, toluene, xylene, or volatile organic compounds in the six soil samples. In the twelve soil samples analyzed for diesel and oil, there was one detection of diesel and three detections of oil, with all concentrations below their respective MTCA Method A standards. Cadmium, mercury, selenium, and silver were not detected in any of the six soil samples analyzed for metals. Arsenic, barium, chromium, and lead were detected in all six soil samples, with all concentrations of arsenic, chromium, and lead below their respective MTCA Method A standards. Barium concentrations were below the MTCA Method B standard. Groundwater grab samples were collected from eleven of the twelve soil borings and analyzed for the same analytes. Benzene, ethylbenzene, toluene, xylene, and other volatile organic compounds were not detected in the six grab samples analyzed for them. The same six grab samples were analyzed for gasoline and metals. Gasoline, mercury, selenium, and silver were not detected in any of the six grab samples. Cadmium was detected in two of six grab samples, with both concentrations below the MTCA Method A standard. Lead was detected in five of six grab samples, with two of five concentrations exceeding the MTCA Method A standard. Barium was detected in all six grab samples, with all concentrations equal to or below the MTCA Method B standard. Arsenic and chromium were detected in all six grab samples, with both concentrations in the same three grab samples exceeding their respective MTCA

Method A standards. Diesel was detected in ten of eleven grab samples, with five of ten concentrations exceeding the MTCA Method A standard. Oil was detected in nine of eleven grab samples, with eight of nine concentrations exceeding the MTCA Method A standard. Groundwater samples were also collected from three groundwater monitoring wells and analyzed for diesel and oil. Diesel and oil were not detected in any of the groundwater samples.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

Soil

Mineral spirits (gasoline) – 100 mg/Kg

Diesel – 2,000 mg/Kg

Oil – 2,000 mg/Kg

Groundwater

Mineral spirits (gasoline) – 1,000 µg/l

Diesel – 500 µg/l

Oil – 500 µg/l

A standard horizontal point of compliance, the property boundary, was used for soil contamination.

A standard vertical point of compliance, fifteen feet, for soils was established in the soils throughout the site from the ground surface to fifteen feet below the ground surface. Fifteen feet is protective for direct contact with the contaminated soil.

A standard vertical point of compliance, from the uppermost level of the saturated zone to the lowest depth that could potentially be affected, was used for groundwater contamination.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The selected remedy - soil excavation and transportation off site to a permitted facility - meets the minimum requirements for cleanup actions by providing a permanent solution to the extent practicable, an immediate restoration time frame, provides for confirmation monitoring, and protects human health and the environment.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

In November of 1988, an underground storage tank was removed and taken off site. Initial confirmatory soil samples taken from the excavation exceeded the regulatory limit at the time. Fifteen to thirty cubic yards of additional soil was excavated and taken off-site. A second round of confirmatory soil samples from the pit bottom and sides had no detections of volatile organic compounds and no detections of petroleum hydrocarbons above 50 mg/Kg.

In August of 1996, bags containing chemical oxidation powders were placed in three groundwater wells.

In March of 2018, contaminated soil was excavated and taken off site to a permitted facility. Oxygen releasing compound (880 pounds) was placed in the excavation prior to backfilling. Thirty-eight confirmational soil samples were collected from the different excavation areas and analyzed for mineral spirits, diesel, and oil. Five confirmational soil samples were also analyzed for polychlorinated biphenyls and polycyclic aromatic hydrocarbons. Polychlorinated biphenyls and polycyclic aromatic hydrocarbons were not detected in any of the five samples. Five confirmational soil samples were analyzed for benzene, ethylbenzene, toluene, and xylene. There were no detections of any of the four analytes in any of the samples. Three of the five confirmational soil samples were analyzed for other volatile organic compounds, with all three having no detections of other volatile organic compounds. Three confirmational soil samples were analyzed for arsenic, cadmium, chromium, lead, mercury, nickel and zinc. Arsenic, cadmium, and mercury were not detected in any of the three samples. Chrome, lead, nickel, and zinc were each detected in all three confirmational soil samples, with all twelve concentrations below their respective MTCA standards. Mineral spirits were detected in seven confirmational soil samples, with all concentrations below the MTCA Method A standard for gasoline. Diesel was detected in eight confirmational soil samples, with all eight concentrations below the MTCA Method A standard. Oil was detected in nine confirmational soil samples, with all concentrations below the MTCA Method A standard.

In June of 2019, three groundwater monitoring wells were installed on the site. Groundwater samples were collected from each well in June, August, and November of 2019 and analyzed for mineral spirits, diesel, oil, and total arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. In August of 2019, two samples were also analyzed for dissolved arsenic. Mineral spirits, diesel, oil, cadmium, chromium, lead, mercury, selenium, and silver were not detected in any groundwater sample in any of the three rounds. Barium was detected in one well in two rounds, with both concentrations below the MTCA Method B standard. Arsenic was detected in two of three wells in all three rounds, with all six concentrations exceeding the MTCA Method A standard. Both dissolved arsenic concentrations in the second round exceeded the MTCA Method A standard. In May of 2020, two additional groundwater wells were installed on site, with all five groundwater wells being sampled in May and August of 2020 and analyzed for the same analytes. Mineral spirits, diesel, and oil were not detected in any well in either round, except for one detection of oil in one well with a concentration below the MTCA Method A standard. Cadmium, mercury, selenium, and silver were not detected in any well in either round of sampling. Chromium and lead were detected in one well in both rounds, with all four concentrations below their respective MTCA Method A standards. Barium was detected in both new wells in both rounds and one older well in the August round, with all five concentrations below the MTCA Method B standard. Arsenic was detected in four wells in the May round and all five wells in the August round, with eight of ten concentrations exceeding the MTCA Method A standard. When plotted on a figure, the arsenic concentrations appear to form an east to west gradient,

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (NW 3226).

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 360 - 407 - 7223 or e-mail at christopher.maurer@ecy.wa.gov.

Sincerely,

Christopher Maurer

Christopher Maurer, P.E.
HQ - Toxics Cleanup Program

Enclosure: A – Description and Diagrams of the Site

cc: Brian Doan, SCS Engineers
Tra Thai, Ecology

Enclosure A

Description and Diagrams of the Site

PCL 1 OF BELLEVUE BLA# 17-108083- LW REC# 20170816900009 BEING POR OF
W 1/2 OF SW 1/4 OF NW STR 33- 25-05

Plat Block:

Plat Lot:



SOURCE: LINDS MAPS

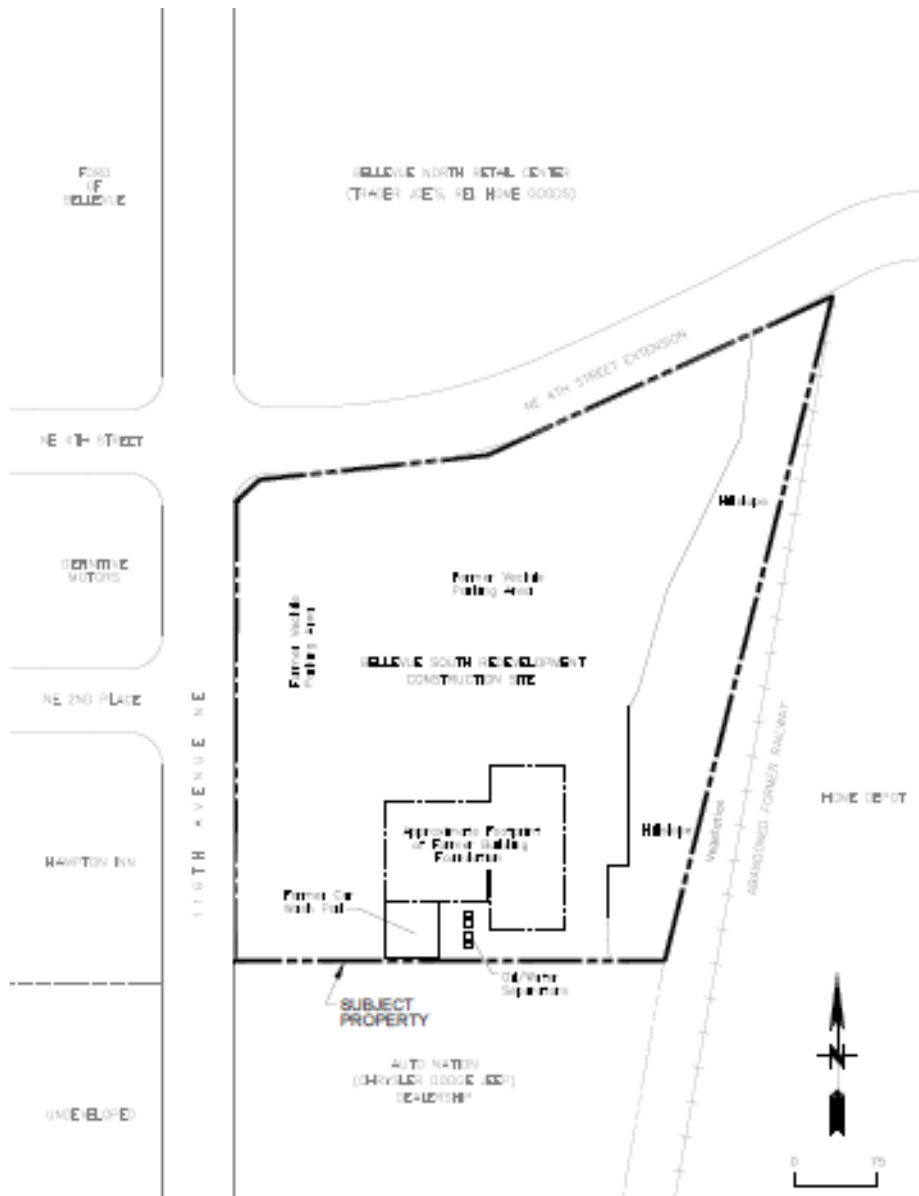
SCS ENGINEERS
 Environmental Consultants and Contractors
 2425 140th Avenue NE, Suite 102
 Bellevue, Washington 98005
 (425) 748-8800 FAX (425) 748-8747

PROJECT NO.	DATE	BY
04270014.00	1/10/19	B.L.
NO.	DATE	BY
AS SHOWN	1/10/19	B.L.
CAD FILE	DATE	BY
FIGURE 1	1/10/19	G.H.

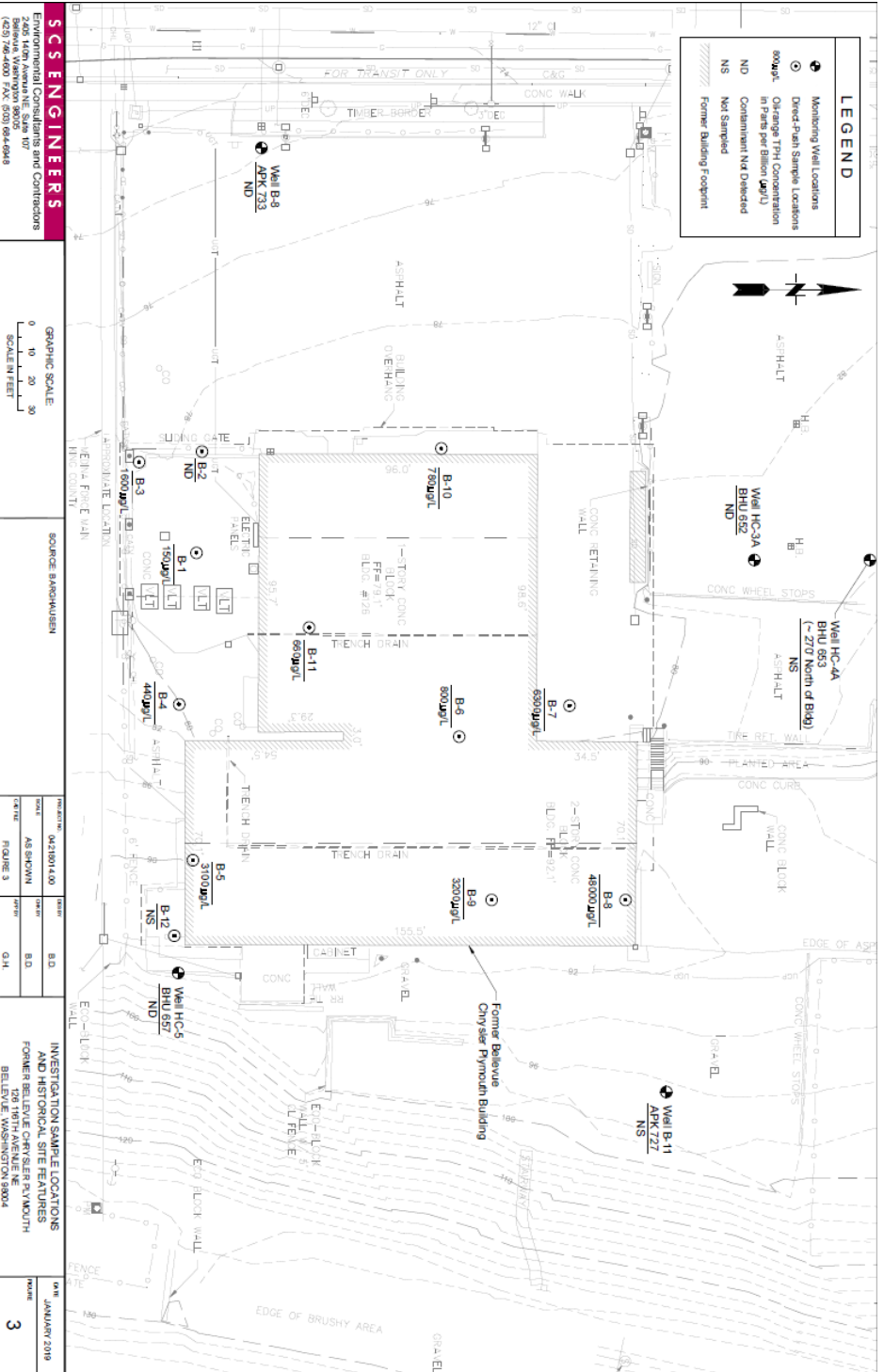
SITE LOCATION MAP
 FORMER BELLEVUE CHRYSLER PLYMOUTH
 125 115TH AVENUE NE
 BELLEVUE, WASHINGTON 98005

DATE	FIGURE
JANUARY 2019	1

0 3000 6000
 SCALE IN FEET



SCS ENGINEERS Environmental Consultants and Contractors 2455 142nd Avenue NE, Suite 107 Bellevue, Washington 98005 (425) 748-8900 FAX: (206) 694-6948	PROJECT:	04218014.00	DATE:	R.D.	SITE PLAN BELLEVUE SOUTH PRE-REDEVELOPMENT CONFIGURATION 200 116TH AVENUE NE BELLEVUE, WASHINGTON 98004	DATE:	JANUARY 2019
	SCALE:	AS SHOWN	DATE:	R.D.		FIGURE:	2
	FIGURE:	FIGURE 2	DATE:	O.K.			



SCS ENGINEERS
 Environmental Consultants and Contractors
 2405 14th Avenue, Suite 107
 (403) 766-4900 FAX: (503) 664-6646

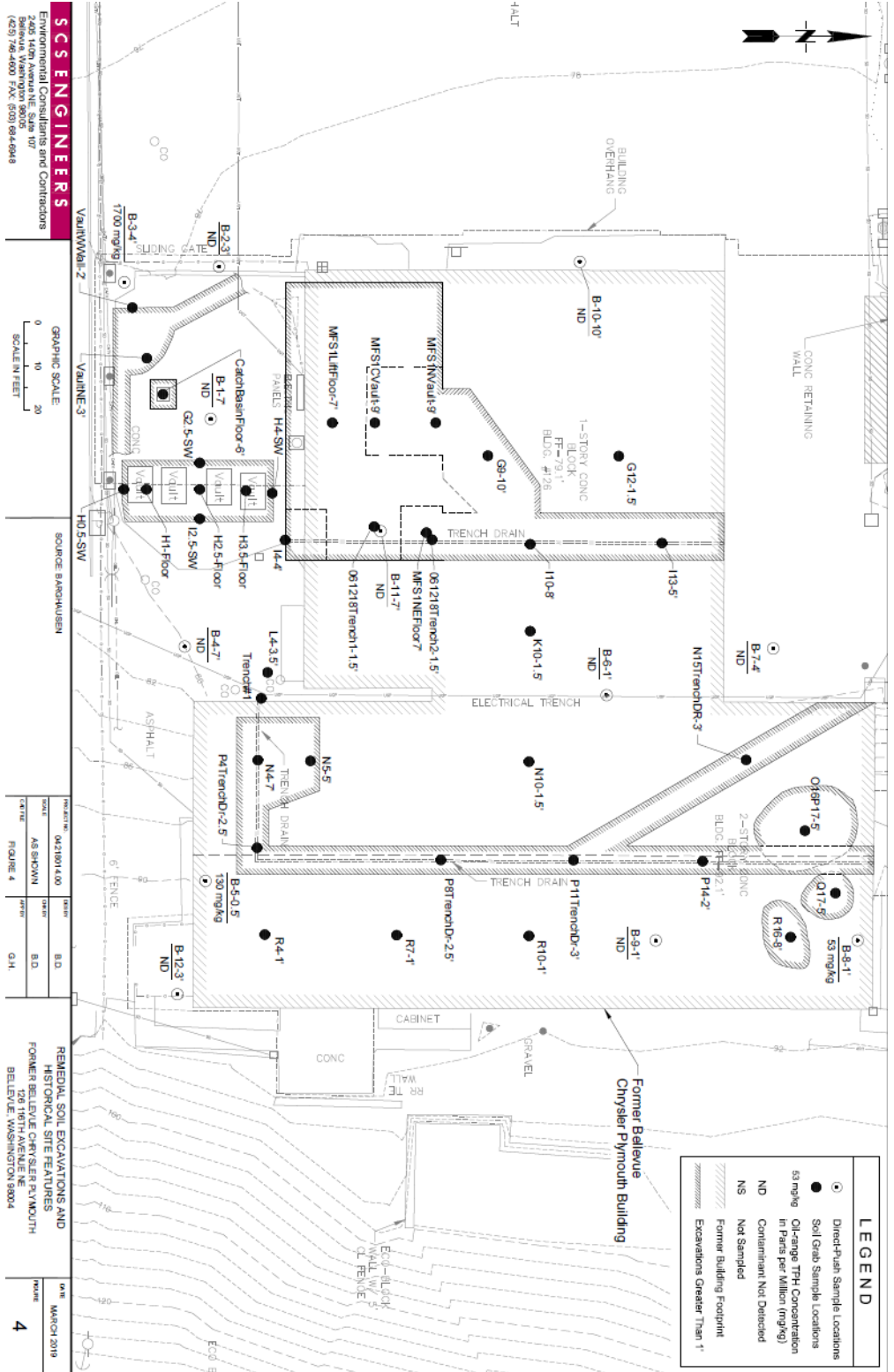
GRAPHIC SCALE
 0 10 20 30
 SCALE IN FEET

SOURCE: BARBUSEN

PROJECT NO.	0421001430	DATE	B.D.
TITLE	ASPH-ALT	DATE	B.D.
CYCLE	FIGURE 3	SCALE	0:1

INVESTIGATION SAMPLE LOCATIONS AND HISTORICAL SITE FEATURES FORMER BELLEVUE CHRYSLER PLYMOUTH BELLEVUE, WASHINGTON 98004

DATE: JANUARY 2019
 SHEET: 3



LEGEND

- Dried-Push Sample Locations
- Soil Grab Sample Locations
- Oil-range TPH Concentration in Parts per Million (mg/kg)
- ND Contaminant Not Detected
- NS Not Sampled
- ▭ Former Building Footprint
- ▨ Excavations Greater Than 1'

SCS ENGINEERS
 Environmental Consultants and Contractors
 2405 14th Avenue NE, Suite 107
 Bellevue, Washington 98005
 (206) 765-4000 FAX: (206) 584-4948

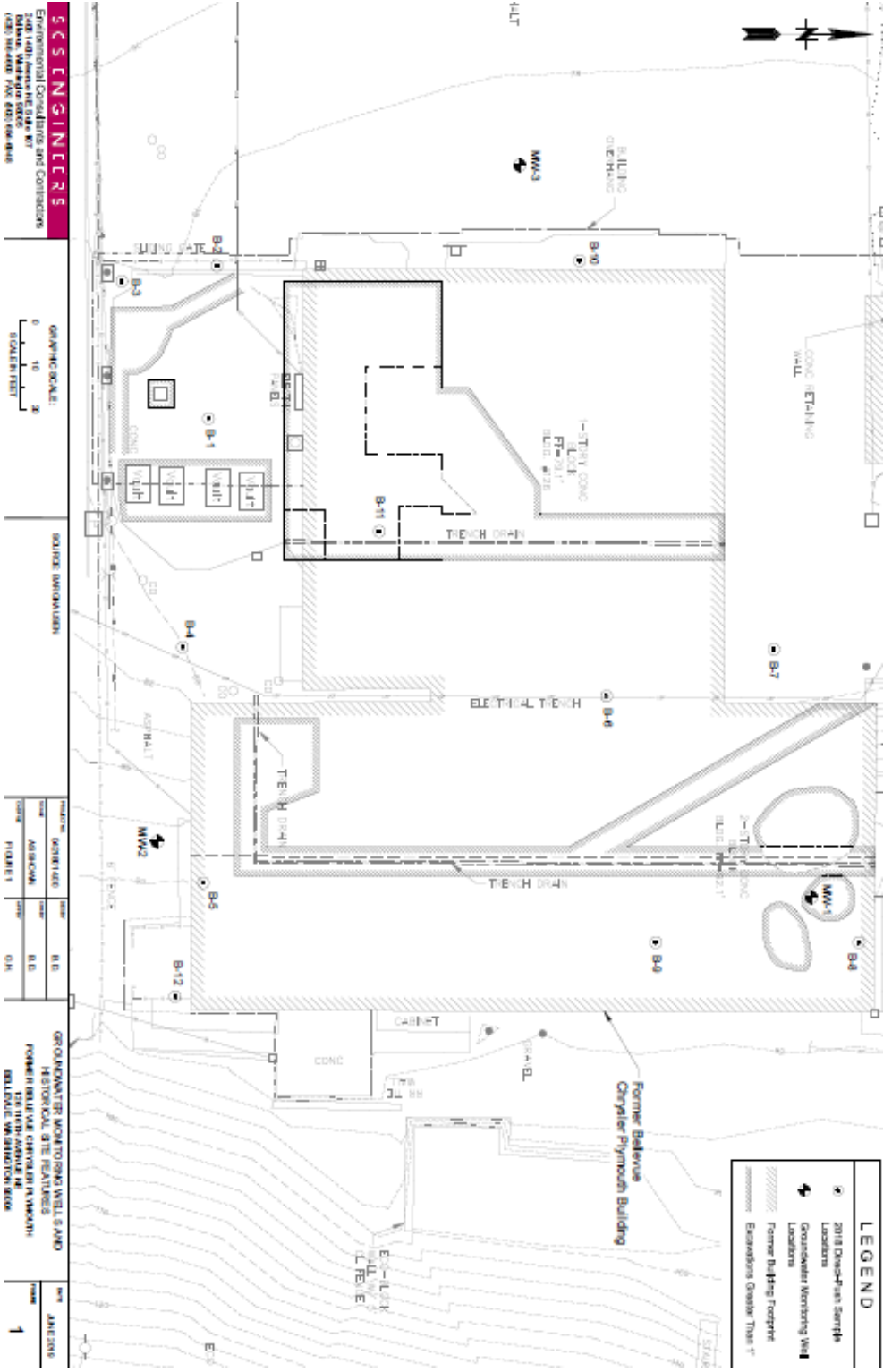
GRAPHIC SCALE:
 0 10 20
 SCALE IN FEET

SOURCE: BANGHUSEN

PROJECT NO.	04218011.00	DATE:	B.D.
SOIL:	AS SHOWN	DATE:	B.D.
SCALE:	FIGURE 4	DATE:	0.11

REMEDIAL SOIL EXCAVATIONS AND HISTORICAL SITE FEATURES
 FORMER BELLEVUE CHRYSLER PLYMOUTH
 1200 15TH AVENUE NE
 BELLEVUE, WASHINGTON 98004

DATE: MARCH 2019
 PAGE: 4



ECS ENGINEERS
 Environmental Consultants and Contractors
 500 North Main Street, Suite 200
 Westborough, MA 01581
 (508) 866-6600 FAX: (508) 866-6601

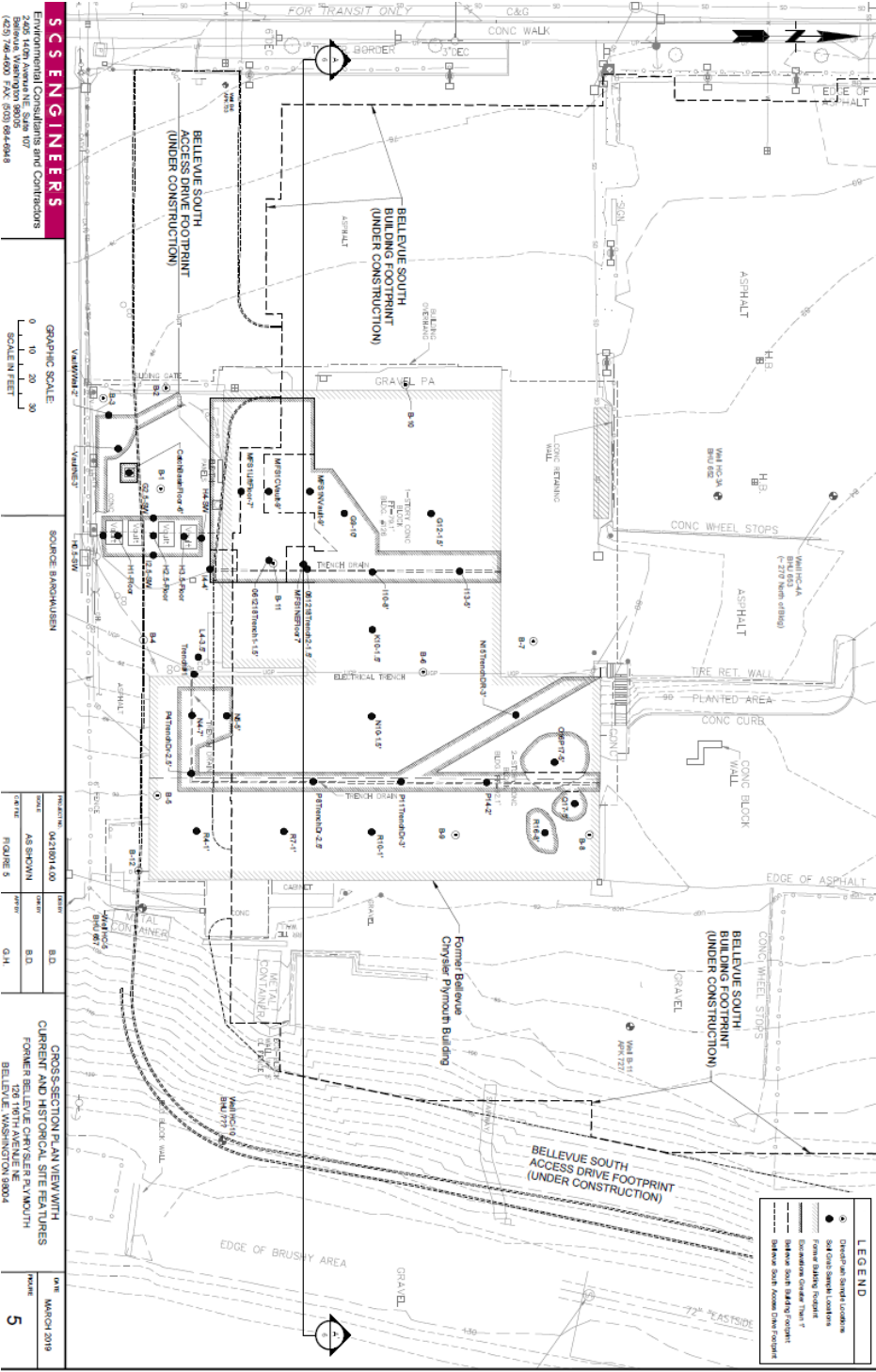
GRAPHIC SCALE:
 0 10 20
 FEET

SCALE: UNCHANGED

DATE	DESCRIPTION	BY	CHKD
08/11/10	AS-BUILT
08/11/10	AS-BUILT
08/11/10	AS-BUILT

GROUNDWATER MONITORING WELLS AND
 POTENTIAL FOR CONTAMINATION
 RELATIVE WATER TABLE

DATE: JANUARY 2010
 SHEET: 1



SCS ENGINEERS
 Environmental Consultants and Contractors
 2405 14th Avenue, Suite 107
 (408) 764-0000 FAX (800) 964-6448

GRAPHIC SCALE:
 0 10 20 30
 SCALE IN FEET

SOURCE: BARBUHUSEN
 14-5-58W

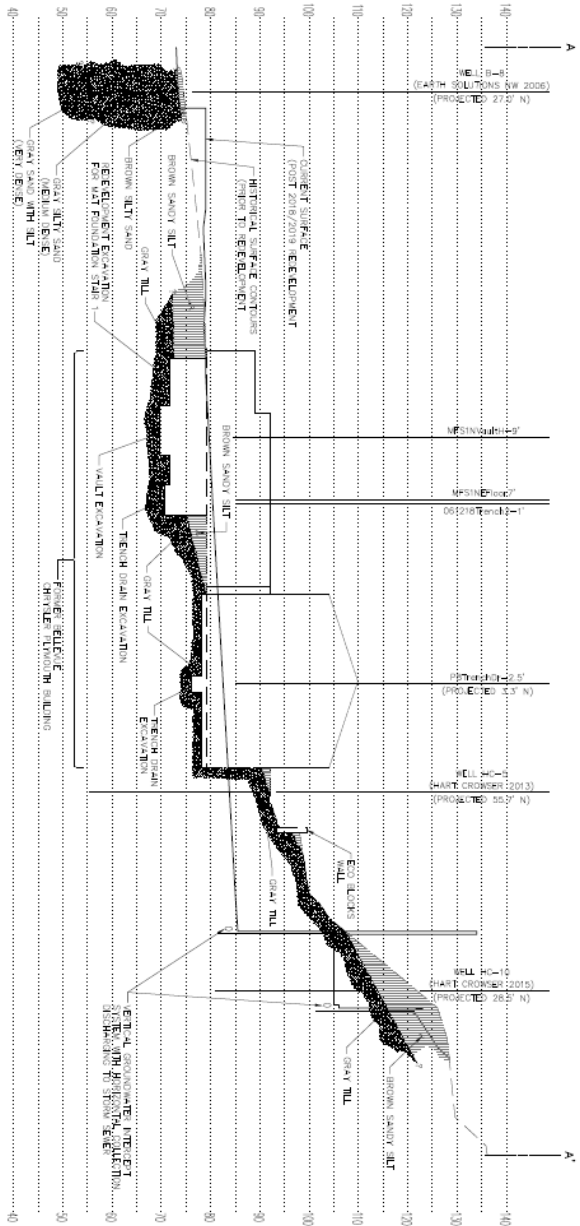
TITLE	04210011.00	DATE	B.D.
SCALE	AS SHOWN	DATE	B.D.
FIGURE	FIGURE 5	DATE	Q.H.

CROSS-SECTION PLAN VIEW WITH
 CURRENT AND HISTORICAL SITE FEATURES
 FORMER BELLEVUE CHRYSLER PLANT SOUTH
 BELLEVUE WASHINGTON 98004

DATE: MARCH 2010
 PAGE: 5

LEGEND

- Drive/Structure Footprint
- Gravel
- ▭ Existing Structure
- ▭ Existing Structure Over 10' ft
- ▭ Existing Structure Over 10' ft
- ▭ Bellevue South Drive Footprint
- ▭ Bellevue South Access Drive Footprint

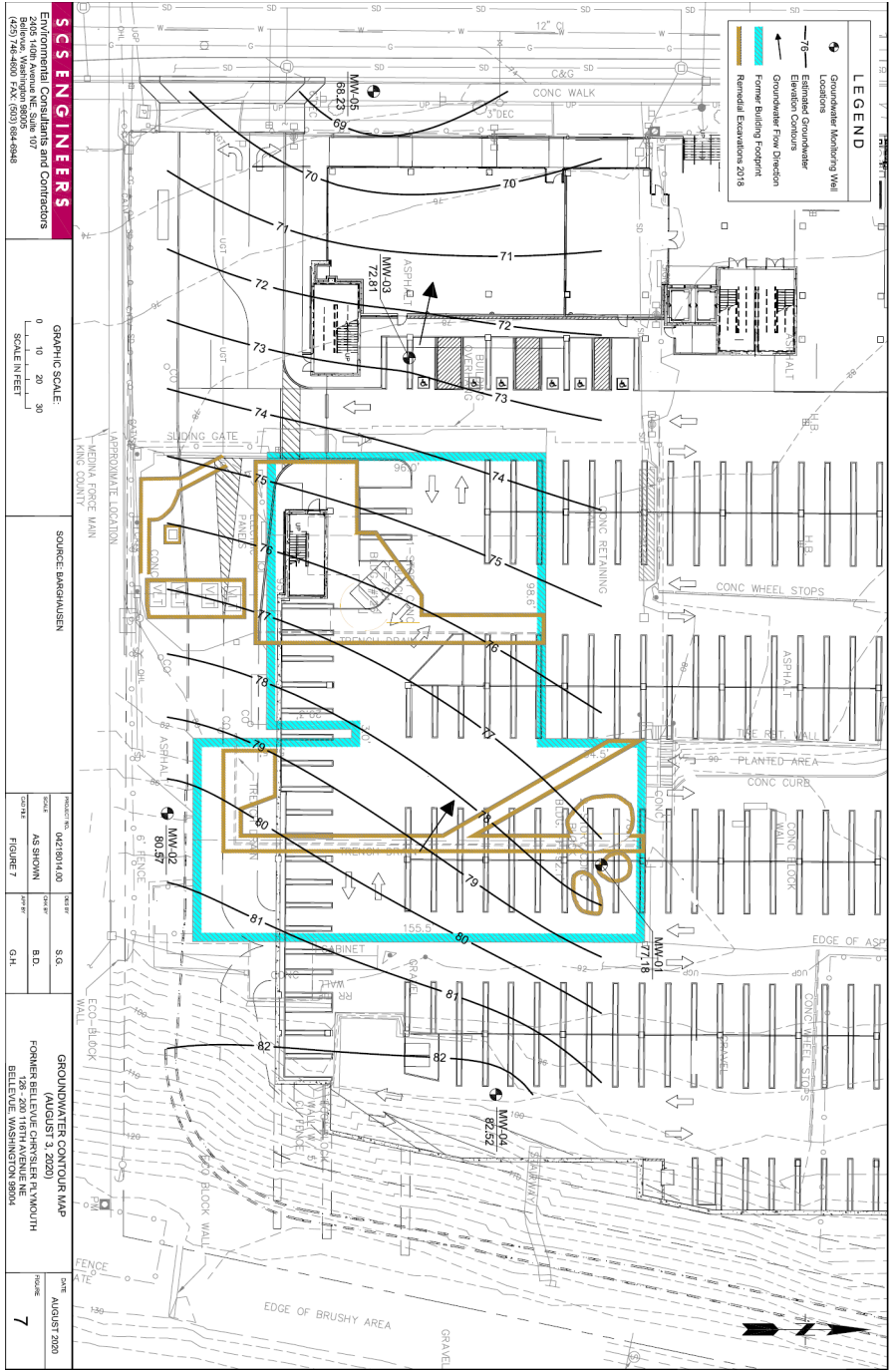


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 (425) 746-4000 FAX: (425) 746-6747

DATE	DESCRIPTION	BY	CHKD.
06/18/2014	REVISED	T.B.	B.D.
01/14/2015	REVISED	G.H.	

CROSS-SECTION
 FORMER BELLEVUE COURSE & YACHT
 1201 11TH AVENUE NE
 BELLEVUE WASHINGTON 98004

DATE: JANUARY 2019
 DRAWING NO: 6



SCS ENGINEERS
 Environmental Consultants and Contractors
 107
 Bellevue, Washington 98005
 (425) 746-4000 FAX: (206) 884-6848

GRAPHIC SCALE:
 0 10 20 30
 SCALE IN FEET

SOURCE: BERGMANSEN

DATE	BY	SCALE	REVISION
04/21/2014	AS	S.G.	ISSUED FOR PERMITS
08/01/14	AS	S.D.	AS SHOWN
08/01/14	GH	S.D.	GH

GROUNDWATER CONTOUR MAP
 (AUGUST 3, 2020)
 FORMER 826-203 110TH AVENUE NE
 BELLEVUE, WASHINGTON 98004

DATE: AUGUST 2020
 FIGURE 7

