



State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
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June 23, 2021

Ms. Heather Gadwa
GHD
20818 44th Ave., Suite 190
Lynnwood, WA 98036

**Re: Revised Work Plan pursuant to Independent Remedial Action at the following
Hazardous Waste Site:**

- **Facility/Site Name:** Sunmart 1
- **Facility/Site Address:** 21449 Pacific Highway South, Des Moines WA 98198
- **Facility Site ID:** 35888116
- **Cleanup Site ID:** 5938
- **PTAP Project No.:** PNW226

Dear Ms. Gadwa:

I have completed my review of the Revised Work Plan, Sunmart 1 facility (Site) by GHD. The original work plan for this Site was submitted by AECOM and approved by PLIA in a letter dated 8/24/2020.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports listed below pursuant to the substantive requirements of the Model Toxics Control Act (MTCA) and its implementing regulations, Chapter 70A.305 RCW and WAC 173-340-515 (Independent Remedial Actions), for characterizing and addressing releases discussed below at the Site.

Issue Presented and Opinion

Does the Proposed Revised Work Plan Report completed for this Site contain sufficient information to delineate the extent of contamination to meet the substantive requirements of the MTCA?

Yes, the Pollution Liability Insurance Agency (PLIA) concurs that the Revised Work Plan Report, with the additional comment provided below, contains sufficient

information to define the extent of contamination to meet the substantive requirements of the MTCA at the Site.

1. Points of compliance (POC) Soil/Groundwater Proposed Boring Locations:

- i. **June 18, 2020 Work Plan:** In a work plan for the Shell-branded Retail Station, 21449 Pacific Highway South, Des Moines WA 98198 by AECOM of June 18, 2020, PLIA approved a proposed point of compliance (POC) well, **MW**, located about 20' east of MW-2 (Fig. 2). The proposed Well, MW, is located within the edge of the property boundary to bound the groundwater plume data gap southeast next to the Pacific Ave ROW (Fig. 2).
- ii. **Jan 21, 2021 Technical Zoom Meeting:** In a biweekly scheduled technical Zoom meeting, GHD proposed revisions to the PLIA approved 6/18/2020 work plan for the Shell-branded Retail Station. The former proposed well location, MW, located about 20' east of MW-2 within the property boundary was relocated by GHD, about 40' east across the Pacific Highway right-of-way (ROW) as MW-13 (Fig. 3). PLIA concurred with the new location.
- iii. **March 9, 2021 GHD Work Plan & 7-Eleven Groundwater Report:** GHD submitted a work plan affirming the outcome of the 1/21/21 technical Zoom meeting, relocating the former proposed well location, MW, located about 20' east of MW-2 within the property boundary, about 40' east across the Pacific Highway ROW as MW-13 (Fig. 4).
- iv. **June 7, 2021 Telephone and Zoom Meeting requested by GHD:** GHD proposed using MW-3 and MW-4 located within the 7-Eleven property boundary as POCs (Fig. 5) to replace PLIA-approved MW-13 to bound the Shell-branded Retail Station groundwater plume data gap, southeast of the Shell Property (Figs. 2 through 4).

PLIA disagreed with this proposal due to the following:

- a. MW-3 and MW-4 located within the 7-Eleven property boundary has historic groundwater contamination above the MTCA Method A cleanup levels (CUL) and free product (MW-3) (Fig.5 and Table A-1).
- b. These exceedances indicate that the front of the plume has since migrated west, beyond the MW-3 and MW-4 locations, towards the Pacific Highway ROW. Continued sampling of MW-3 and MW-4, which is the tail of the plume, without defining the extent of the front of the plume that has since migrated off property to the west constitutes a critical data gap. MW-3 and MW-4 may not serve as POCs for 7-Eleven Property at those locations, west

of the property (Fig. 5 & Table A-1).

- c. Our subsequent inquiry with the Department of Ecology (Ecology) noted that the 7-Eleven Site is not receiving oversight in the Ecology voluntary cleanup program (VCP).

- v. **June 8, 2021 Email Communication from Heather Gadwa of GHD to PLIA:** GHD proposed revising their earlier proposed permanent groundwater monitoring well MW-13 to a temporary well instead.

PLIA disagreed for the same reasons discussed above. A permanent groundwater monitoring well as approved at the MW-13 location (Figs. 3 & 4) must be installed.

PLIA will not accept a temporal well as a substitute for a permanent groundwater monitoring well especially when setting POC for groundwater.

2. Catch Basin Evaluation:

Please note that your omission to assess the catch basin (Fig. 2) as proposed in the work plan (March 9, 2021) constitutes a critical data gap for the evaluation of groundwater/surface water exposure paths and dynamics and must be addressed as part of the final no further action (NFA) determination at this Site.

Description of the Property and the Site

This opinion applies only to the Site located at 21449 Pacific Highway South, Des Moines, WA 98198 and comprises one Snohomish County tax parcel described below.

This opinion does not apply to any other release(s) that may affect the Property (parcel). Any such releases, if known, are identified separately below.

1. Description of the Property:

The Property includes the following tax parcel in Snohomish County, affected by the Site and addressed by your cleanup (Fig. 1):

- Tax Parcel No.: 0922049232

2. Description of the Site:

The parcel makes up the Site and includes **portions of the public ROW of Pacific Highway South to the east of the Site**, and is defined by the nature and extent of contamination associated with the following release (Fig. 2):

- Total petroleum hydrocarbons as gasoline, diesel & oil (TPH-g, TPH-d & TPH-o) and associated benzene, toluene, ethylbenzene and xylenes (BTEX), lead and potentially naphthalene and other volatile organic compounds into the soil/groundwater/vapor.

3. Identification of other Sites that may affect the Property.

Please note, a parcel of real property can be affected by multiple sites. At this time, we have **no information** that this Property was affected by other sites.

Enclosure A includes the diagram of the Site, as currently known to PLIA.

Basis of the Opinion

1. Email Communication from Heather Gadwa of GHD to PLIA of 6/8/21. Re: PNW226 – Sunmart 1 GHD Work Plan Memo & 7-Eleven Groundwater Data. Requesting that if revising proposed monitoring well MW-13 to a temporary well would suffice to determine if there is lingering contamination in the Pacific Highway ROW.
2. Work Plan Revisions, SunMart-1, 21449 Pacific Highway South, Des Moines, Washington 98198. Project No. 11218550 by GHD of March 9, 2021.
3. Work Plan Revisions, SunMart-1, 21449 Pacific Highway South, Des Moines, Washington 98198. Project No. 11218550 by GHD of March 9, 2021.
4. 7-Eleven Store 21774 – 2018 and 2019 Groundwater Monitoring and Sampling Report, 21454 Pacific Highway South, SeaTac, WA; FSID 18421741 by Stantec of 6/26/19; Attention Donna Musa, Department of Ecology.
5. Investigation Work Plan, Shell-branded Retail Station, 21449 Pacific Highway South, Des Moines WA 98198 by AECOM of June 18, 2020.

Documents submitted to PLIA are subject to the Public Records Act (Chapter 42.56 RCW). To request public records, please email pliamail@plia.wa.gov.

This opinion is void if any of the information contained in the document(s) is materially false or misleading.

Please Note:

Remedial Investigation/Feasibility Study (RI/FS): To ensure compliance with the substantive requirements of the MTCA as you develop the RI and FS according to WAC 173-340-350, please see the Department of Ecology (Ecology) Checklist publication numbers 16-09-006 and 16-08-007 May 2016 for the RI/FS respectively.

Cleanup Action Plan (CAP): When developing a CAP, please refer to WAC 173-340-360 through 450. To ensure that cleanup standards have been appropriately set and applied, incorporating all potential exposure pathways and receptors, in accordance with WAC 173-340-700 through 760, please see the Ecology CAP Checklist Publication No. 16-09-008 May 2016.

Report Template: Your reporting must meet the substantive requirements of the MTCA described in WAC 173-340-350(7) and WAC 173-340-840. For a suggested reporting template, and to review the other publications mentioned above, please follow this link: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Cleanup-report-checklists-and-templates>

Closure of Low Risk Petroleum Sites in the State: To expedite and streamline the closure of low risk petroleum sites in the state of Washington, please see Ecology's published Model Remedies for soil, groundwater, vapor and empirical demonstration guidelines at the following link: : <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/MTCA-model-remedies>

Natural Attenuation Guidance: For guidance and calculation tools for demonstrating that natural attenuation of groundwater is occurring, please consult the following link: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Clean-up-petroleum-contamination>. The guidance may help you predict when groundwater cleanup levels will be met as part of your multiple lines of evidence to support, streamline and expedite site closure.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Under the MTCA, liable persons are strictly liable, jointly and severally, for all remedial action costs and for all-natural resource damages resulting from the release(s) of hazardous substances at the Site. This opinion **does not**:

- Change the boundaries of the Site.
- 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 the Office of the Attorney General and Ecology under RCW 70A.305D.040 (4).

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

To recover remedial action costs from other liable persons under the 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 equivalent. Courts make that determination (RCW 70A.305D.080 and WAC 173-340-545).

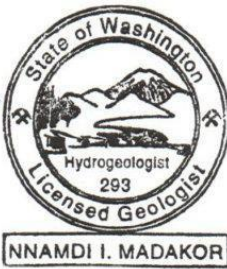

3. State is immune from liability.

The state, PLIA, 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.

Contact Information

Thank you for choosing to clean up your property under the PLIA Petroleum Technical Assistance Program (PTAP). If you have any questions about this opinion, please contact me by phone at 1-800-822-3905, or by email at nnamdi.madakor@plia.wa.gov.

Sincerely,



Nnamdi Madakor, P. HG, P.G.
Technical Programs Manager

Nm: nm

Enclosure A: Fig. 1: Site Vicinity Map

Fig. 2: AECOM Proposed Boring Locations Map Work Plan 6/18/2020

Fig. 3: GHD-Revised AECOM Proposed Boring Locations Map Technical Zoom Meeting 1/21/21

Fig. 4: GHD-Revised AECOM Proposed Boring Locations Map – Work Plan 3/9/21

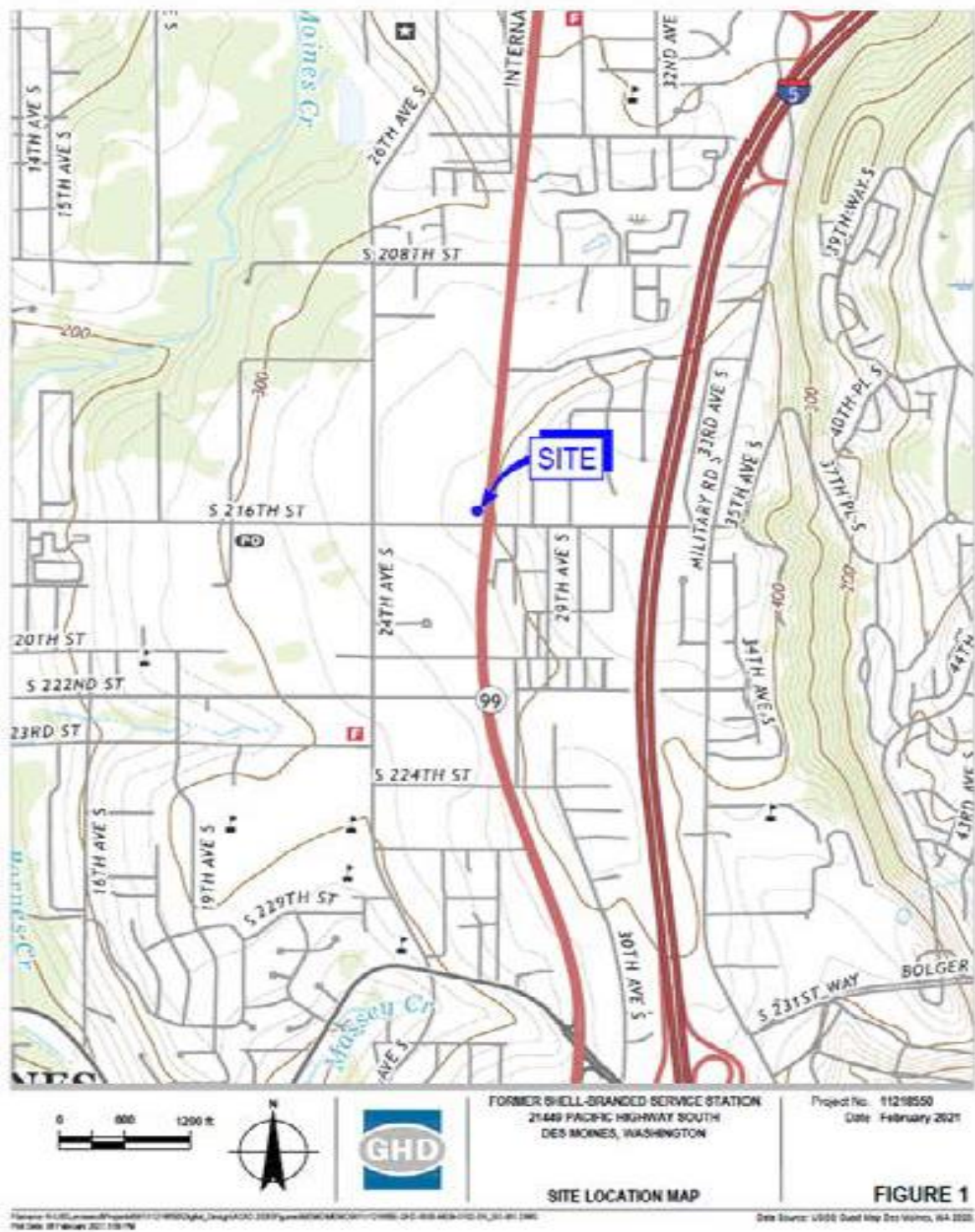
Fig. 5: GHD- Proposed MW-3 & MW-4 of 7-Eleven Wells with Historic Contamination & Free Product as POC wells in Place of MW-13

Table A-1: MW-3 & MW-4 of 7-Eleven Wells - Historic Groundwater Analytical Results

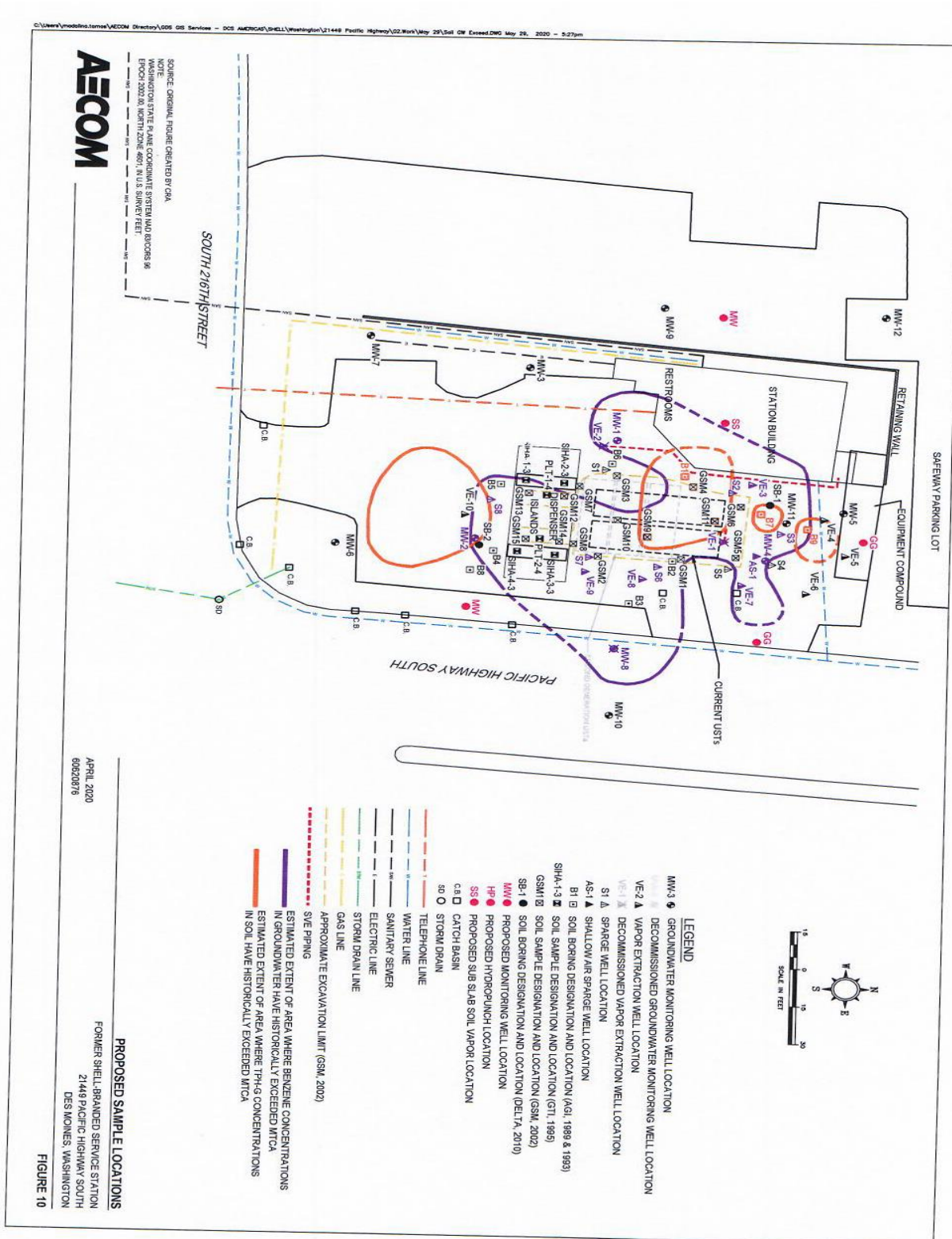
cc: Mr. Jasbir Singh, RS Singh LLC (email only)
Mr. John Robbins, Shell Oil (email only)
Mr. Brian Peters, GHD (email only)
Ms. Donna Musa, Ecology (email only)
Ms. Kristin Evered, PLIA (email only)
Ms. Carrie Pederson, PLIA (email only)
Mr. Russ Olsen, Director – PLIA (email only)

Enclosure A:
Sunmart 1 Site
PTAP Project No. PNW226

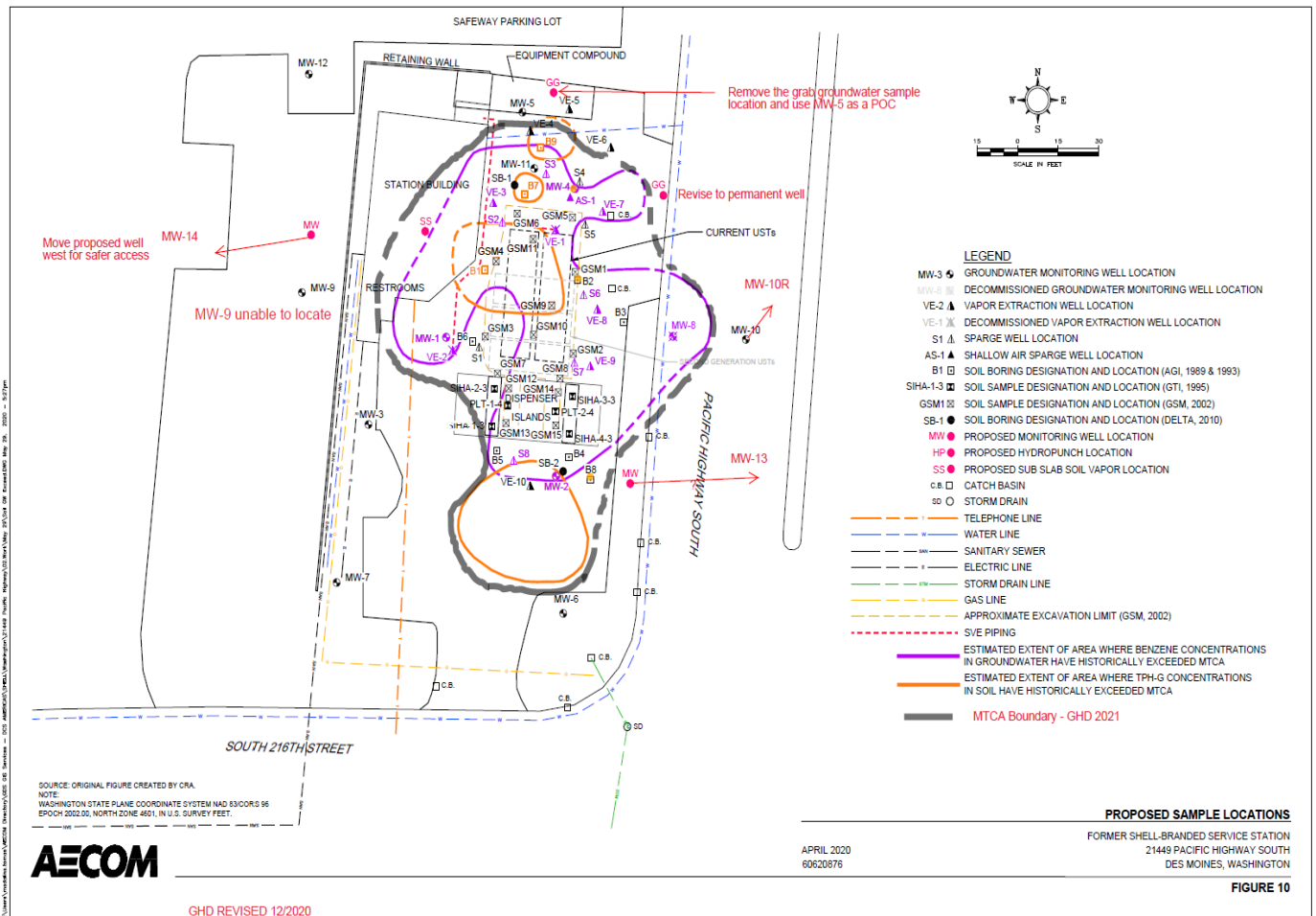
Fig. 1: Site Vicinity Map



**Fig. 2: AECOM Proposed Boring Locations Map
Work Plan 6/18/2020**



**Fig. 3: GHD-Revised AECOM Proposed Boring Locations
Map Technical Zoom Meeting 1/21/21**



**Fig. 4: GHD-Revised AECOM Proposed Boring Locations
Map – Work Plan 3/9/21**

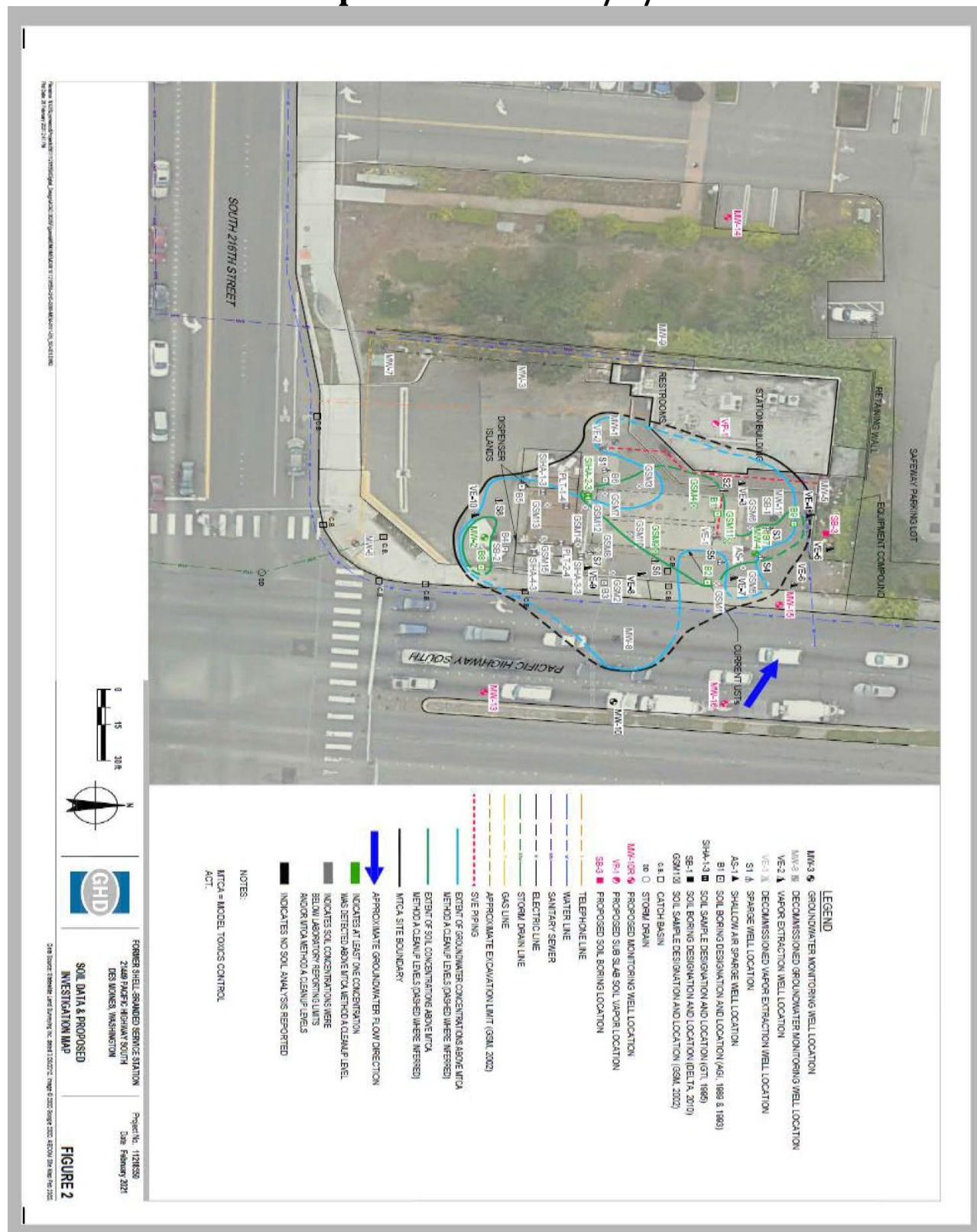
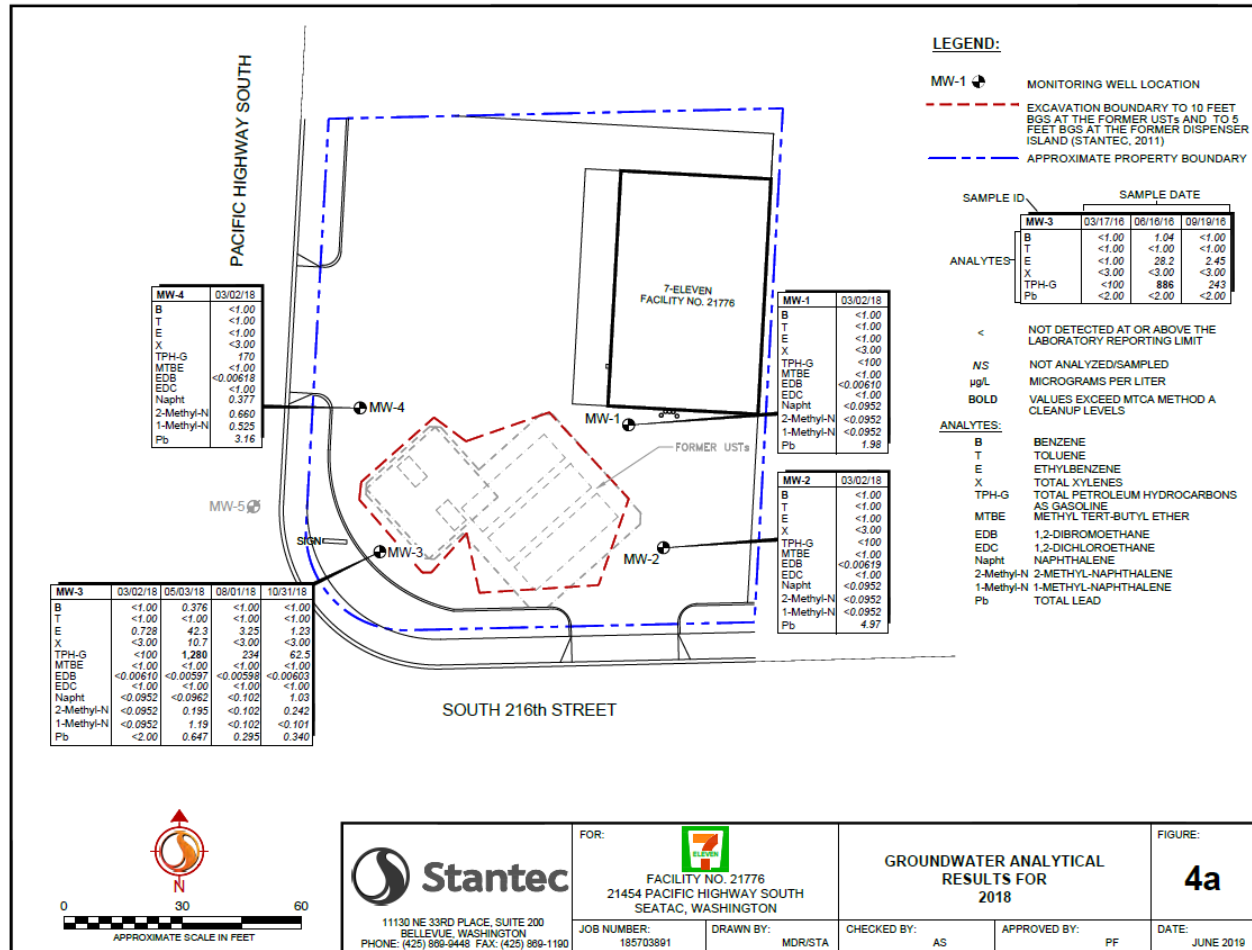


Fig. 5: GHD- Proposed MW-3 & MW-4 of 7-Eleven Wells with Historic Contamination & Free Product as POC wells in Place of MW-13



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Table A-1: MW-3 & MW-4 of 7-Eleven Wells - Historic Groundwater Analytical Results

TABLE 1
GROUNDWATER MONITORING AND ANALYTICAL RESULTS
7-Eleven Store #21776
21454 Pacific Highway South, Seatac, Washington
All concentrations are reported in micrograms per liter (µg/L)

Sample ID (TOC)	Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	TPH-G	MTBE	EDB	EDC	Naphthalene	2-Methylnaphthalene	1-Methylnaphthalene	Total Lead	Depth To Groundwater (feet below TOC)	Groundwater Elevation (feet above msl)
MW-3 404.97	07/16/99	10.73	394.24
	08/04/99	274	7.1	182	280	2,970	10.85	394.12
	03/24/00	540	37	160	2,100	9,800	<5	8.80	396.17
	06/27/00	1,000	53	670	3,900	5,100	9.44	395.53
	09/11/00	80	2.2	72	54	1,100	11.24	393.73
	11/14/00	62	3.5	59	38	750	11.04	393.93
	02/21/01	140	5.7 ^h	100	220	1,800	9.98	394.99
	05/30/01	89	<5.0	95	120	1,700	10.54	394.43
	08/27/01	76	3.3	62	26	870	10.84	394.13
	12/18/01	2,400	80	1,700	23,000	160,000	8.96	396.01
	03/20/02	226	13.8	28.7	459	2,910	9.20	395.77
	06/21/02	190	10.9	218	394	3,770	10.24	394.73
	09/20/02	3.38	0.537	4.53	2.483	145	11.25	393.72
	11/20/02	4.12	0.782	6.22	7.02	248	11.31	393.66
	03/17/03	24	2.1	11	380	5,500	9.22	395.75
	06/26/03	39	<5.0	78	45	1,200	11.62	393.35
	09/26/03	2.7	<1.0	8.5	4.7	360	12.45	392.52
	12/19/03	150	<20	250	740	7,000	10.07	394.90
	03/16/04	230	27	440	1,360	10,000	10.59	394.38
	06/22/04	110	13	230	475	5,000	11.21	393.76
	09/27/04	53	4.0	150	200	3,500	11.45	393.52
	12/03/04	40	4.2	94	121	2,100	11.70	393.27
	03/15/05	45	5.2	72	233	3,400	11.21	393.76
	06/15/05	14	1.1	18	36	650	9.84	395.13
	09/29/05	<1.0	<1.0	24	5.3	1,800	7.68	397.29
	03/01/06	46	<4.0	47	128	1,700	9.60	395.37
	06/22/06	100	11	380	779	7,400	8.19	396.78
	09/21/06	22	130	31	360	2,100	6.74	398.23
	01/04/07	1.4	<1.0	<1.0	2.9	<100	8.24	396.73
	03/30/07	59	7.2	10	46	1,300	8.51	396.46
	08/27/07	100	13	140	189	2,400	11.00	393.97
	02/12/08	580	61	240	392	4,400	9.71	395.26
	09/29/08	170	<10	96	61	1,100	11.56	393.41
	12/30/08	160	11	190	258	3,500	12.32	392.65
	03/25/09	590	100	350	540	5,800	9.54	395.43
	07/29/09	480	62	140	111	2,400	11.10	393.87
	12/15/09	<1.0	<1.0	<1.0	<2.0	<100	12.15	392.82
	01/13/11	67	4.9	110	100	2,800	8.12	396.85
	1/24/2011	UST Removal 1/24/2011													
	06/17/11	57	6.8	200	200	2,700	9.76	395.21
	08/30/11	21	1.3	56	11	1,000	10.70	394.27
	12/19/11	18	1.1	50	7.8	1,200	10.63	394.34
	02/02/12	0.83	<0.50	1.4	2.6	<250	8.35	396.62
	05/10/12	13	1.2	35	13	720	9.03	395.94
	08/14/12	22	1.5	160	7.5	<1100	19.25	395.72
	12/06/12	1.3	<0.50	3.2	3.5	<250	8.43	396.54
	02/20/13	7.0	1.1	54	26	730	9.83	395.14
	06/25/13	21	1.7	190	14	1,500	9.96	395.01
	11/07/13	13	1.0	110	5.9	1,200	10.40	394.57
	05/08/14	3.42	<1.00	<1.00	<2.00	219	3.04	401.93
	11/17/14	<1.00	<1.00	<1.00	<2.00	104	9.84	395.13
	04/06/15	<1.00	<1.00	<1.00	<2.00	160	<2.00	396.05
	06/26/15	2.26	<1.00	58.3	<3.00	40,500*	<2.00	10.60
	03/17/16	<1.00	<1.00	<1.00	<3.00	<100	<1.00	<0.0198	<1.00	<2.00	7.57
	06/16/16	1.04	<1.00	28.2	<3.00	886	<2.00	10.45
	09/19/16	<1.00	<1.00	2.45	<3.00	243	<2.00	11.20
	03/23/17	<1.00	<1.00	<1.00	<3.00	<100	<1.00	<0.00590 ¹	<1.00	<0.0962	<0.0962	<0.0962	<2.00	7.56	397.41
	06/14/17	1.50	<1.00	61.5	33.7	1,230	<1.00	0.0142 ¹	<1.00	8.73	2.04	2.65	<2.00	9.80	395.17
	09/08/17	<1.00	<1.00	13.2	<3.00	409	<1.00	<0.0120 ¹	<1.00	7.31	0.717	0.972	<2.00	11.36	393.61
	11/18/17	<1.00	<1.00	3.77	<3.00	254	<1.00	<0.00610 ¹	<1.00	0.564	0.0935	0.277	<2.00	9.42	395.55
	03/02/18	<1.00	<1.00	0.728 ¹	<3.00	<100	<1.00	<0.00610 ¹	<1.00	<0.0952	<0.0952	<0.0952	<2.00 ¹
	05/03/18	0.376 ¹	<1.00	42.3	10.7	1,280	<1.00	<0.00597 ¹	<1.00	<0.0962	0.195	1.19	0.647 ¹	9.42	395.55
	08/01/18	<1.00	<1.00	3.25	<3.00	234	<1.00	<0.00598 ¹	<1.00	<0.102	<0.102	0.295 ¹	11.65	393.32	..
	10/31/18	<1.00	<1.00	1.23	<3.00	62.5 ¹	<1.00	<0.00603 ¹	<1.00	1.03	0.242	<0.101	0.340 ¹	11.91	393.06
	02/01/19	<1.00	<1.00	0.265 ¹	<3.00	149	<1.00	..	<1.00	<0.0980	<0.0980	<0.0980	1.44	9.61	395.36
	05/16/19	<1.00	<1.00	23.8	0.981 ¹	650	<1.00	0.522	0.0904 ¹	0.598	..	6.41	398.56
MICA Method A Cleanup Level		5	1,000	700	1,000	800/1,000 ²	20	0.01	5	160 ³			15		

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Sample ID (OC)	Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	TPH-G	MTBE	EDB	EDC	Naphthalene	2-Methylnaphthalene	1-Methylnaphthalene	Total Lead	Depth To Groundwater (feet below TOC)	Groundwater Elevation (feet above ms)
MW-4 403.20	07/16/99	9.60	393.60
	08/04/99	6.43	<0.3	5.32	1.81	363
	03/24/00	15	1.1	8	17	340	<5	9.65	393.55
	06/27/00	8.7	<0.5	<0.5	<1.0	<100	7.46	395.74
	09/11/00	<0.5	<0.5	1.7	<1.0	150	6.17	397.03
	11/14/00	<0.5	<0.5	1.7	2.1	170	9.96	393.24
	02/21/01	17	1.3	41	89	2,700	10.01	393.19
	05/30/01	2.4	<0.5	10	12	430	9.13	394.07
	08/27/01	<0.5	<0.5	1.9	1.9	170	9.57	393.63
	12/18/01	2.6	3.4	16	31	1,100	9.77	393.43
	03/20/02	5.87	<1.0	13.7	45.3	1,630	8.66	394.54
	06/21/02	2.25	<1.0	10.6	6.55	481	8.65	394.55
	09/20/02	0.326	<1.0	<1.0	<3.0	<100	9.38	393.82
	11/20/02	<0.5	<1.0	<1.0	<3.0	<100	10.44	392.76
	03/17/03	4.3	<1.0	9.7	32.6	2,900	10.48	392.72
	06/26/03	1.2	<1.0	7.5	5.2	690	8.73	394.47
	09/26/03	<1.0	<1.0	<1.0	<2.0	<100	10.63	392.57
	12/19/03	2.0	<1.0	19	33.6	2,600	11.60	391.60
	03/16/04	5.3	<1.0	36	40.7	3,500	9.52	393.68
	06/22/04	6.9	1.3	74	73	6,400	9.49	393.71
	09/27/04	2.6	<1.0	35	28.2	3,400	9.84	393.36
	12/03/04	1.2	<1.0	19	14	2,400	10.06	393.14
	03/15/05	1.8	<1.0	27	17	2,900	10.62	392.58
	06/15/05	1.4	<1.0	4.7	7.6	1,000	9.84	393.36
	09/29/05	9.7	1.1	99	99	1,800	8.45	394.75
	03/15/06	<1.0	<1.0	1.2	<2.0	<100	8.10	395.10
	06/22/06	<1.0	<1.0	<1.0	<2.0	<100	8.70	394.50
	09/21/06	<4.0	9.6	9.7	105	1,600	9.84	393.36
	01/04/07	<1.0	<1.0	<1.0	<2.0	<100	7.11	396.09
	03/30/07	<1.0	<1.0	<1.0	<2.0	<100	7.52	395.68
	08/27/07	8.5	<4.0	10	<8.0	520	7.15	396.05
	02/12/08	42	<4.0	16	6.1	1,100	10.60	392.60
	09/29/08	15	<4.0	<4.0	<8.0	<400	8.54	394.66
	12/30/08	440	250	34	116	1,900	9.32	393.88
	03/25/09	400	87	53	80	1,600	13.16	390.04
	07/29/09	20	<4.0	10	9.1	580	7.87	395.33
	12/15/09	<1.0	<1.0	<1.0	<2.0	<100	9.56	393.64
	07/01/10	14	<4.0	14	<8.0	810	12.89	390.31
	01/13/11	11	8.8	81	68	1,900	8.10	395.10
	1/24/2011	5.89	397.31
	06/17/11	3.0	0.72	9.8	5.7	700	8.17	395.03
	08/30/11	0.7	<0.50	4.2	1.4	1,100	9.50	393.70
	12/19/11	<0.50	<0.50	2.4	<0.50	720	8.69	394.51
	02/02/12	<0.50	<0.50	2.5	1.4	<250	6.27	396.93
	05/10/12	<0.50	<0.50	<0.50	<0.50	<250	7.80	395.40
	08/14/12	<0.50	<0.50	2.2	<0.50	500	18.66	384.54
	12/06/12	<0.50	<0.50	<0.50	<0.50	<250	6.40	396.80
	02/20/13	<0.50	<0.50	<0.50	<0.50	<250	8.43	394.77
	06/25/13	<0.50	<0.50	2.5	<0.50	870	8.60	394.60
	11/07/13	<0.50	<0.50	1.5	<0.50	730	8.74	396.23
	05/08/14	<1.00	<1.00	<1.00	<2.00	<50.0	6.97	394.46
	11/11/14	<1.00	<1.00	<1.00	<2.00	118	8.42	394.78
	04/08/15	<1.00	<1.00	<1.00	<2.00	<100	<2.00	7.84	395.36
	06/26/15	<1.00	<1.00	<1.00	<3.00	24,700*	<2.00	9.30	393.90
	03/17/16	<1.00	<1.00	<1.00	<3.00	<100	<1.00	<0.0203	<1.00	<2.00	5.98	397.22
	06/16/16	<1.00	<1.00	<1.00	<3.00	504	<2.00	9.35	393.85
	09/19/16	<1.00	<1.00	<1.00	<3.00	<100	<2.00	10.26	392.94
	03/23/17	<1.00	<1.00	<1.00	<3.00	287	<1.00	<0.00603	<1.00	0.211	<0.0962	<0.0962	<2.00	5.73	397.47
	06/14/17	9.86	393.34
	09/08/17	10.66	392.54
	11/18/17	8.17	395.03
	03/02/18	<1.00	<1.00	<1.00	<3.00	170	<1.00	<0.00618	<1.00	0.377	0.660	0.525	3.16*
	05/03/18	8.33	394.87
	08/01/18	10.64	392.56
	10/31/18	10.12	393.08
	02/01/19	8.48	394.72
	05/16/19	9.36	393.84
MICA Method A Cleanup Level		5	1,000	700	1,000	800/1,000*	20	0.01	5	..	160*	..	15