STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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June 30, 2021

Joseph Stuart
Da-Li Development, LLC
Colliers International REMS US, LLC
601 Union Street, Suite 5300
Seattle, WA 98101

Re: No Further Action at the following Site:

- **Site Name:** Former White River Cleaners
- **Site Address:** 4018 A Street SE, Auburn, WA 98002
- **Facility/Site No.:** 86958
- **Cleanup Site ID No.:** 15147
- **VCP Project No.:** NW3295

Dear Joseph Stuart:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Ace Cleaners 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

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 it's 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 release(s):

- Chlorinated solvents (Tetrachloroethylene [PCE], Trichloroethylene [TCE]) into Soil, Soil Vapor, & Indoor Air, herein referenced as the Contaminants of Concern (CoCs).

Enclosure A includes a detailed description and diagrams 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.

Basis for the Opinion

This opinion is based on the information contained in the documents listed in Enclosure B. These 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) 649-7235 or sending an email to nwro_public_request@ecy.wa.gov.

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 below and in detail in Enclosure A.

Characterization activities that have commenced at the Site to-date are listed below:

- In March 2015, Partner Engineering advanced three exterior soil borings to approximately 13-feet below ground surface (bgs), and two interior borings to approximately 3-feet bgs. Soil vapor and soil CoCs were detected above their respective screening levels (SLs) or cleanup levels (CULs).
- In September 2015, Environmental Associated, Inc. (EAI) performed interior air sampling at the dry cleaning facility. In addition, EAI advanced a total of five soil borings in the interior and along the western perimeter of the facility. Soil, soil vapor, & indoor air was all detected above the respective SLs or

CULs.

- In December 2015, EAI installed three monitoring wells (MWs) to approximately 30-feet bgs, as well as three soil borings along the western perimeter of the Site to determine of off-Site impacts have migrated on-Site from an adjoining, up-gradient gasoline station. Petroleum constituents in soil were not detected. Chlorinated solvents were detected in soil and soil-vapor above the respective SLs or CULs in the MWs advanced.
- In 2016, EAI sampled groundwater from the three aforementioned MWs. EAI sampled groundwater quarterly, exhibiting detections below the respective laboratory method detection limit (MDL). As such, it is likely groundwater is not impacted from the release, but further sampling is recommended (see comments below).
- In May 2017, EAI installed an additional eight soil borings to further characterize impacts to soil. Analytical data suggest the majority of impacted soil extends to approximately 8-feet bgs, with the exception of one location where soil impacts extended to approximately 13-feet bgs.
- In July 2018, EAI installed a soil-vapor extraction system (SVE) in an effort to remediate impacted soil & soil-vapor. The majority of the SVE piping was installed in the building interior. Following operations for 6-months. EAI asserts that a 72% drop in soil and soil-vapor contamination occurred following 6-months of operation.
- From September 2019 to February 2020, EAI performed soil-vapor sampling at both the intake and out-going feeds to the SVE system. Soil-vapor samples were collected monthly, and exhibited soil-vapor concentrations below the respective SLs.
- In April 2021, EAI collected three indoor air and one exterior ambient air samples. Chlorinated solvents were not detected in any of the air samples collected.
- In May 2021, EAI advanced a total of nine soil borings in locations that previously exhibited non-compliant concentrations of chlorinated solvents in soil. All soil samples collected during this investigation did not contain concentrations of chlorinated solvents above the respective CULs or laboratory MDLs.
- Also in May 2021, EAI collected groundwater samples from the three existing MWs. Chlorinated solvents were not detected above the laboratory MDLs in any of the samples collected.

In summary, on-Site media, including indoor air, groundwater and soil are in compliance with Cleanup Standards at this time.

Exposure Pathways:

Soil-Direct Contact:
This pathway is *incomplete*. It appears as if residual chlorinated solvent-impacted soil was effectively remediated, and achieving compliance with Cleanup Standards for soil.

Soil-Leaching:
This pathway is *incomplete*. Chlorinated solvents have not been detected in groundwater above the applicable MTCA CULs or laboratory MDLs. Additionally, residual soil concentrations are below MTCA Method A CULs.

Soil-Vapor:
This pathway is currently *incomplete*. In April 2021, EAI sampled ambient as well as indoor air, exhibiting compliance with Cleanup Standards.

Groundwater:
This pathway is *incomplete*. As indicated above and in detail in Enclosure A, chlorinated solvents have not been detected in groundwater above the respective MTCA Method A CULs.

Surface Water:
This pathway is *incomplete*. No surface water features are located in the vicinity of the Site.

Ecological:
This pathway is *incomplete*. EAI completed a terrestrial ecological evaluation (TEE), and the Site qualified for an exclusion.

2. Establishment of Cleanup Standards.

Ecology has determined the CULs and points of compliance (POCs) you established for the Site meet the substantive requirements of MTCA.

Of the CoCs addressed, the following CULs apply.

The Groundwater MTCA Method A or B* CULs are:

PCE	5.0 micrograms per liter (µg/L)
TCE	5.0 µg/L
VC	0.2 µg/L
cis-1,2-DCE*	16 µg/L

trans-1,2-DCE*	160 µg/L

The Soil MTCA Method A or B* CULs are:

PCE	0.05 milligrams per kilogram (mg/Kg)
TCE	0.03 mg/Kg
VC*	0.67 mg/Kg
cis-1,2-DCE*	16 mg/Kg
trans-1,2-DCE*	160 mg/Kg

The Indoor Air MTCA Method B CULs are:

PCE*	9.62 micrograms per cubic-meter (µg/m^3)
TCE*	0.37 µg/m^3
VC*	0.28 µg/m^3
cis-1,2-DCE	No CUL established
trans-1,2-DCE	No CUL established

a. Points of Compliance

Based on the conceptual Site model (CSM), Ecology determined the following POCs apply to the Site:

Soil - Direct Contact: For soil CULs based on human exposure via direct contact, the point of compliance is: "*…throughout the Site from ground surface to 15-feet below the ground surface.*"

Soil - Leaching: For Sites where soil CULs are based on the protection of groundwater: "*…the point of compliance is throughout the Site."*

Soil -Vapor: For soil vapor, the standard POC as established under WAC 173-340-750(6) is: *"Cleanup levels established under this section shall be attained in the ambient air throughout the Site."*

Groundwater: For groundwater, the standard POC as established under WAC 173-340-720(8) is: "*…throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site.*"

3. Selection of Cleanup Action.

Ecology has determined the cleanup actions completed at the Site meet the substantive requirements of MTCA. A No Further Action determination is warranted at this time.

4. Cleanup.

Ecology determined the cleanup actions performed meet the Cleanup Standards established for the Site in accordance with MTCA.

Performance groundwater, soil, and indoor sampling demonstrate compliance with Cleanup Standards and a No Further Action determination is recommended at this time.

Listing of the Site

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

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.

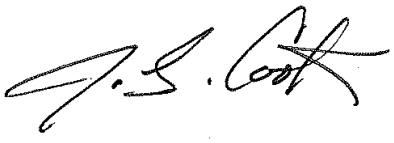
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

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.

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) 407-6834 or e-mail at jason.cook@ecy.wa.gov.

Sincerely,



J.G. Cook, LG
HQ Toxics Cleanup Program

JC: AF

Enclosures: A – Description of the Site
B – List of Documents/Bibliography

cc: Eric Zurn, EAI
Sandra Caldwell, Ecology
Mike Shaljian, Ecology
Sonia Fernandez, Ecology
Tra Thai, Ecology

Enclosure A

Description of the Site

Site Description

Site:
The Site is located at 4018 A Street SE Street, Auburn, Washington. The Site is comprised of a single King County Parcel, (no. 3021059018), totaling 0.89-acre. The Site is currently used for commercial/retail purposes and is occupied by a hair salon, and a retail wireless vendor. The former White River Cleaners tenant space is reportedly vacant. The Site is improved with a single-story commercial building totaling 8,400 square-feet, asphalt-paved parking, & landscaping. The commercial structure was constructed in 1993 (King County Department of Assessment, February 2021).

The Site is located within a mixed-use commercial area in Auburn. The Site is zoned *C-3 Heavy Commercial* according to the City of Auburn Planning Department. The Site is surrounded by commercial businesses.

Property Historical and Current Use:
Currently, the Site is improved with a single commercial structure comprising a retail strip-mall. Chlorinated solvent-based dry cleaning was reportedly conducted on-Site in the central tenant space of the on-Site building. White River Cleaners reportedly operated at this on-Site location in 1993 until the late-2010s (LAI, November 2020).

The Site was initially developed in 1993 with the existing commercial structure.
Prior to 1993, the Site was reportedly occupied by a variety of unknown commercial facilities (LAI, November 2020).

Surface/Storm Water System:
No surface water features are located on the Site. The White River is located approximately 1,100-feet to the south-southeast of the Site.

It is assumed stormwater is conveyed to the municipal separate storm sewer system operated and maintained under the NPDES Phase Two Municipal Stormwater Permit for the City of Auburn.

Soils and Geology:
The Site and much of the Puget Sound Region is underlain by alluvial Quaternary sediments deposited during multiple glacial episodes. The sediments consist of interlayered alluvial clays, silts, sands, & gravels. These alluvial sediments are typically situated over glacial till, primarily comprised of consolidated silts, sands & gravels.

Soils encountered at the Site generally consist of silt and sands with gravel to approximately 15-feet bgs. This unit is reportedly underlain by dark-colored sand to approximately 30-feet bgs (EAI, November 2020).

Groundwater:
Groundwater at the Site is encountered at approximately 15-feet bgs (EAI, November 2020). Potentiometric maps supplied by EAI indicate a groundwater flow direction to the west.

Source of Contamination & Contamination Extent:

The primary source of contamination reportedly originates from a release(s) due to improper installation, malfunction, or usage of a former on-Site dry cleaning machine and storage of dry cleaning chemicals, resulting in spillage and leakage of chlorinated solvents/VOCs into soil, soil-vapor, indoor air, and potentially groundwater beneath the Site.

In March 2015, Partner Engineering (Partner) advanced three exterior soil boring to approximately 13-feet bgs, and two soil interior soil borings to approximately 3-feet bgs. Soil Vapor collected from the building interior exhibited chlorinated VOC concentrations above the respective SLs. Soil and groundwater concentrations did not exceed the respective CULs during this investigation.

In September 2015, EAI conducted soil, indoor air, and groundwater sampling following the advancement of five soil borings in the building exterior and interior. Groundwater was reportedly not encountered. Indoor air and soil exhibited PCE & TCE concentrations above the SLs & CULs, respectively. Two interior soil borings and one exterior soil boring (located adjacent to the building exit) contained the aforementioned soil impacts. As such, it was postulated that soil impacts were likely localized in the vicinity of the former dry cleaning machine and at the building exit (LAI, November 2020).

In December 2015, EAI installed three MWs to approximately 30-feet bgs, and three soil borings along the western perimeter of the Site. The soil borings advanced along the western Site perimeter were used to determine if petroleum constituents originating from the up-gradient gasoline station had impacted soil and groundwater underlying the Site. Petroleum constituents were not detected above the respective CULs in both soil & groundwater samples collected. In addition, chlorinated solvents were not detected in soil or groundwater collected from the three MWs.

In 2016, LAI sampled groundwater quarterly from the three aforementioned MWs. Groundwater did not exhibit detectable concentrations of chlorinated solvents above the respective laboratory MDLs. As such, it was determined that groundwater is likely not impacted, but periodic sampling should commence to completely verify (LAI, November 2020).

In May 2017, EAI installed an additional eight soil borings in an effort to further delineate the Site. It was determined that chlorinated soil impacts may extend underneath the adjoining tenant spaces, and are mostly confined to the upper 8-feet of soil, underlying the former dry cleaner interior, with the exception of soil boring location B-12.

In July 2018, EAI installed a soil-vapor extraction system (SVE). The SVE was fully operational by December 2018. EAI installed subsurface PVC piping underneath the interior of the former dry cleaner. Following six months of operation, soil-vapor and soil were sampled, exhibiting that chlorinated solvent concentrations in both soil-vapor and soil were reduced by 72% (EAI, November 2020).

EAI collected monthly soil vapor samples from the inflow & outflow components of the SVE system, from September 2019 to February 2020, and again in April 2020 & September 2020. Chlorinated solvents were detected in soil-vapor samples, but were below the respective MTCA Method B SLs (EAI, November 2020).

In April 2021, EAI deployed four, 6-liter Summa canisters to collect indoor and ambient air samples from the adjoining tenant spaces, former dry cleaner location, and up-gradient ambient air. Air samples were collected under a 24-hour continuous sampling scenario. Chlorinated solvents were not detected in any of the indoor air or outdoor air samples (EAI, June 2021). However, 1,2-dichloroethane (EDC) was detected in all air samples, with one sample located in an adjoining tenant space above the respective CUL at a concentration of 0.27 micrograms per cubic-meter ($\mu g/m^3$). EDC was additionally detected in the outdoor air sample. EDC is not a breakdown product associated with the reductive-dechlorination of PCE, and is not associated with this release. EAI postulated this detection to be associated with the lawful use of chemicals in the adjoining hair salon during normal business operations. The indoor air maximum contaminant level (MCL) is established by the Washington State Industrial Safety & Health Act (WISHA) at 4,047 $\mu g/m^3$ (EAI, June 2021).

In May 2021, EAI advanced nine soil borings in locations previously identified to exhibit chlorinated solvent concentrations in soil above the respective CULs, including building interiors within the adjoining tenant spaces and the former location of White River Cleaners. None of the soil samples collected during this investigation exhibited concentrations above the respective CULs or laboratory MDLs (EAI, June 2021).

Also in May 2021, EAI sampled the three existing MWs. Previous groundwater sampling events did not exhibit chlorinated solvent concentrations above the respective laboratory MDLs. EAI conducted a total of six groundwater monitoring & sampling events, five of which were quarterly-consecutive (2015-2016), (EAI, June 2021).

In summary, on-Site media (soil, groundwater & indoor air) are in compliance with Cleanup Standards. As such, a No Further Action (NFA) determination is warranted at this time.

Enclosure B

List of Documents/Bibliography

Environmental Associates, Inc. (EAI), *Supplemental Subsurface Testing and Sampling.* Dec. 8, 2015.

EAI, *First Quarter Groundwater Monitoring Sampling and Testing-March 2016*. December 27, 2016.

EAI, *Second Quarter Groundwater Monitoring Sampling and Testing-June 2016*. June 24, 2016.

EAI, *Third Quarter Groundwater Monitoring Sampling and Testing-September 2016*. September 28, 2016.

EAI, *Fourth Quarter Groundwater Monitoring Sampling and Testing-December 2016*. December 27, 2016.

EAI, *Characterization of On-Site Contamination*. May 3, 2017.

EAI, *Vapor Extraction System Installation and Initial Operation Report.* September 3, 2019.

EAI, *Vapor Extraction System 6-Month Monitoring Activity.* March 12, 2020.

EAI, *Continued Vapor Extraction system 6-Month Monitoring Activity*. October 16, 2020.

EAI, *Remedial Investigation / Feasibility Study Cleanup Action Plan.* November 30, 2020.

EAI, *Further Characterization of Contamination / Conformation Sampling and Testing.* June 2, 2021.