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DEPARTMENT OF ECOLOGY
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August 27, 2021

Mike Raskin
MJR Development
6725 116th Avenue NE, Suite 100
Kirkland, WA 98033
(mikem@mjrdevelopment.com)

Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site:

- **Site Name:** Meeker Cleaners
- **Site Address:** 1317 West Meeker Street, Kent, WA 98032
- **Facility/Site No.:** 87719977
- **Cleanup Site ID:** 1177
- **VCP Project No.:** NW3168

Dear Mike Raskin:

The Washington State Department of Ecology (Ecology) received your request for an opinion on Background Organic Carbon Study the Meeker Cleaners facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issue Presented and Opinion

Pursuant to completion of the Site characterization work described in *Background Organic Carbon Study*, dated May 4, 2021 (*May 2021 Study*), is additional work necessary to resolve data gaps?

YES. Ecology has determined that diesel and oil concentrations analyzed <u>without</u> silica gel cleanup should be used for Site groundwater characterization and monitoring. Additional work is needed to resolve data gaps.

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 heavy oil-range petroleum hydrocarbons (TPHd and TPHo), tetrachloroethene (PCE), and trichloroethene (TCE) into the Soil.

- TPHd, TPHo, and vinyl chloride (VC) into the Groundwater.

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

Please note that a parcel of real property can be affected by multiple sites. The Site is located on two King County parcels (number 5436200524 and 5436200526), which are currently used as Meeker Square shopping center (Property).

A second cleanup site, Meeker Gas Station Former (facility ID 44681713), is also located on the Property, approximately 170 feet east of the Site. The Meeker Gas Station Former facility is managed separately under VCP project number NW3167. Based on the available information, the Meeker Gas Station Former facility does not affect, and is not affected by the Site.

At this time, we have no information that the parcels associated with this Site are affected by other sites.

Basis for the Opinion

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

1. TRC Environmental Corporation (TRC), *Re: Background Organic Carbon Study, Former Meeker Cleaners Site, 1317 West Meeker, Kent, Washington*, May 4, 2021.

2. Ecology, *Re: Further Action at the following Site: Meeker Cleaners, 1317 West Meeker Street, Kent, WA 98032, VCP Project No. NW3168*, May 5, 2020.

3. Environmental Partners Inc. (EPI), *Groundwater Monitoring Report, Former Meeker Cleaners Site, 1301 West Meeker Street, Kent, Washington*, December 18, 2019.

4. EPI, *Remedial Investigation, Feasibility Study, and Cleanup Action Plan, Former Meeker Cleaners Site, 1301 West Meeker Street, Kent, Washington*, September 6, 2017.

5. EPI, *Interim Remedial Action Report, Former Meeker Cleaners, 1301 West Meeker Street, Kent, King County, Washington*, September 1, 2017.

6. EPI, *Technical Memorandum, Re: Summary of Investigation, Meeker Square Property, 1301 West Meeker Street, Kent, Washington*, February 25, 2016.

7. Migizi Group, Inc., *Memorandum, Meeker Square – 1301 West Meeker, Kent, WA, Re: Groundwater Sampling*, September 8, 2014.

8. SCS, *Voluntary Cleanup Program Soil Remediation Report – Soil Excavation and Disposal, PCE Remediation Project, Former Meeker Cleaners Site, Meeker Square Shopping Center*,

VCP NW0879, September 2002.

A number of these documents are accessible in electronic form from the Site webpage[1]. The complete records are stored in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our Public Records Request page[2] to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or 360-407-6040.

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

Analysis and Opinion

A background groundwater study was conducted at the Site and documented in your *May 2021 Study* report. Based on a review of your *May 2021 Study*, Ecology has determined:

- The data provided in the *May 2021 Study* suggest that naturally-occurring organics do not increase the detected TPHd and TPHo concentrations in groundwater.
    - Three background groundwater samples (DP16 through DP18) were collected up-gradient of the known soil contamination and groundwater plume. The total organic carbon (TOC) concentrations in these samples ranged from 1,040 micrograms per liter (µg/L) to 4,430 µg/L, higher than typical uncontaminated groundwater. It appears that naturally-occurring organics may be present in background groundwater.
    - However, the high TOC concentrations did not result in elevated TPHd and TPHo concentrations in these background groundwater samples. Instead, all three background groundwater samples contained TPHd and TPHo concentrations below the laboratory practical quantitation limit (PQL) when analyzed without silica gel cleanup (SGC) treatment. The data suggest that the natural-occurring organics, if present in these groundwater samples, do not impact the results of the NWTPH-Dx analysis. Therefore, any detected TPHd and TPHo values in Site groundwater are not likely attributable to naturally-occurring organics.
- It is Ecology's opinion that the TPHd and TPHo concentrations analyzed without SGC treatment should be used to determine Site groundwater conditions.
    - As stated in Ecology's *Further Action* letter on May 5, 2020 (*May 2020 FA letter*), SGC treatment removes polar organic materials from the samples during NWTPH-Dx analysis. These polar organics include naturally-occurring organics (typically polar) and petroleum hydrocarbon's intermediary degradation by-products (degradation polar metabolites). SGC

[1] Site Information (wa.gov)
[2] Public records requests - Washington State Department of Ecology

does not distinguish between these two. While naturally-occurring organics are not considered contamination, the degradation polar metabolites are still considered part of the petroleum hydrocarbon concentration determination because of their possible related toxicities, carcinogenicities and mutagenicities.

- In 2017 through 2018, groundwater samples from monitoring wells MW-1 through MW-3 were analyzed by Method NWTPH-Dx with and without SGC treatment. The TPHd and TPHo concentrations, analyzed with SGC treatment, are below the PQL for four consecutive quarters in all three monitoring wells. However, the TPHd plus TPHo concentrations, analyzed without SGC treatment, were above the MTCA Method A groundwater cleanup levels for monitoring wells MW-1 and MW-2.

- The analytical results indicate that significant amounts of polar organics are present in the groundwater samples and have been removed by the SGC treatment. In addition, laboratory reports indicate the groundwater samples' chromatographic pattern do not resemble the fuel standard used for quantitation, which is likely due to the presence of polar organics in the groundwater samples. However, because the background groundwater sampling results suggest that naturally-occurring polar organics do not impact the NWTPH-Dx analytical results, the polar organics in the groundwater samples that contribute to the TPHd and TPHo detections are likely degradation polar metabolites of petroleum hydrocarbons.

- As indicated above, the degradation polar metabolites are still considered as part of the petroleum hydrocarbons mixtures present in groundwater. The TPHd and TPHo concentrations that are attributable to degradation polar metabolites still need to be cleaned up to the MTCA Method A groundwater cleanup level.

- Therefore, the data provided do not support the use of SGC treatment in NWTPH-Dx analysis. Groundwater samples can be analyzed with and without SGC, but the TPHd and TPHo concentrations analyzed without SGC treatment should be used to characterize groundwater and demonstrate groundwater compliance.

- Ecology's *May 2020 FA letter* identified data gaps in soil, groundwater, and soil vapor characterization. These data gaps should be resolved. The *May 2020 FA letter* requested additional soil sampling, additional monitoring wells and groundwater monitoring, and vapor intrusion pathway evaluation. Ecology recommends submitting a work plan to ensure the additional Site characterization will meet the substantive MTCA requirements.

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 70A.305.040(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 70A.305.080 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 70A.305.170.

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

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, please contact me by phone at (206) 594-0100 or by e-mail at jing.song@ecy.wa.gov.

Sincerely,

Jing Song
Site Manager
NWRO Toxics Cleanup Program

Enclosure (1): A – Site Description and Diagrams

cc: Eric Koltes, TRC (EKoltes@trccompanies.com)
Sonia Fernandez, Ecology VCP Coordinator, NWRO, (sonia.fernandez@ecy.wa.gov)

Enclosure A

Description and Diagrams of the Site

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions expressed in the letter.

Site: The Meeker Cleaners Site is defined as TPHd, TPHo, PCE, and TCE released to soil, as well as TPHd, TPHo, and VC released to groundwater at 1301 West Meeker Street in Kent, Washington (Property) (**Figure 1**). The Property consists of two King County parcels (number 5436200524 and 5436200526), which covers 9.8 acres of land on the northwest corner of the intersection of the Washington Avenue North and West Meeker Street (**Figure 2**).

The portion of the Site impacted by the releases is on the southwest corner of parcel 5436200526. Currently the Site boundary is not fully defined. The Site may extend to the west on the southeast corner of parcel 5436200524, and to the south on the city of Kent right-of-way (West Meeker Street). .

Area and Property Description: The Property is currently used as Meeker Square shopping center, which includes a department store (Big Lots), a pharmacy (Rite Aid), a dry cleaners (Meeker Cleaners), a self-serve garage, multiple restaurants (Ichi Teriyaki, Jimmy Johns, Egghole, and Emerald City Smoothie), and offices of the Washington Department of Social and Health Services. The current Property layout is depicted on **Figure 2**.

The Property is located within a commercially zoned area in Kent. The Property is bounded to the east by Washington Avenue North and Crossgate Shopping Center. The Property is bounded to the south by West Meeker Street. A Chevron-branded service station, and a few fast food restaurants (McDonald's, Burger King, and Taco Bell) are located further south. The Property is bounded to the north by West Smith Street, with multiple office buildings beyond. The Property is bounded to the west by apartment buildings and a church.

A second cleanup site, Meeker Gas Station Former (facility ID 44681713), is also located within the Meeker Square shopping center, approximately 170 feet east of the Meeker Cleaners Site. The Meeker Gas Station Former Site is addressed separately under a VCP number NW3167 and does not affect, and is not affected by, the Meeker Cleaners Site.

Property History and Current Use: The Meeker Square shopping center was constructed in 1966 with an addition in 1983. An additional two-tenant commercial building was completed in 1991 on the southern portion of the shopping center, where the former dry cleaners (Meeker Cleaners) operated from 1991 through the end of 1999 (**Figure 3**). The historic street address associated with the former dry cleaners is 1317 West Meeker Street, Suite H-1.

In 2000, dry cleaning operations stopped, the building was demolished, and the dry cleaner business was moved to 1313 West Meeker Street, which is also located in the Meeker Square Shopping Center. The current Meeker Cleaners operates as an active "drop stop" with no dry cleaning operation ever taking place on the Property (**Figure 2**). The portion of the Property

where the former Meeker Cleaners was located has been used for parking for the shopping center since approximately 2000 (**Figure 3**).

Sources of Contamination: Based on the Site investigations, two sets of contaminants of concern (COCs) are present at the Site:

- Halogenated volatile organic compounds (HVOCs):

  HVOC COCs include PCE, TCE, and VC. The HVOC contamination was initially discovered in 1996. The contamination is associated with the former dry cleaning operations at the Site.

- Petroleum hydrocarbons:

  Petroleum hydrocarbon COCs include TPHd and TPHo. The petroleum hydrocarbon contamination was initially discovered in 2014. The source of the petroleum hydrocarbon contamination is unknown.

Physiographic Setting: The Site is located in the Puget Sound Lowlands physiographic province, a broad north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. The Site is situated at an elevation of approximately 40 feet above mean sea level. The land surface in the immediate vicinity of the Site is relatively flat.

Surface/Storm Water System: The nearest surface water body is the Green River, located approximately 1,900 feet (0.35 miles) south of the Property. Surface water runoff on the Property is directed to catch basins across the Property, and along the southern and eastern Property boundaries on West Meeker Street and Washington Avenue North.

Ecological Setting: The area surrounding the Property is zoned for commercial uses. Land surfaces on the Property and adjacent properties are primarily covered by buildings and asphalt or concrete pavement with landscaped areas.

Geology: Surficial geology in this area is dominated by Pleistocene glacial alluvium with recent alluvium in river floodplains and mouths. Alluvial deposits are typically comprised of interbedded sands, silts, and gravels. The Site and the surrounding area is located within the Green River Valley, which is a low-lying valley filled with recent alluvium near the surface.

Subsurface soils encountered at the Site include gravelly sand fill material to approximately 1 to 2 feet below ground surface (bgs), followed by silty sand, poorly graded sand with varying amounts of silt, and silt with varying amounts of sand and gravels, to the maximum depth explored of 20 feet bgs. Soils encountered beneath West Meeker Street consist of silty sand to approximately 6 feet bgs, underlain by sandy silt to the maximum depth explored of 15 feet bgs.

Groundwater: Site shallow groundwater occurs at depths ranging from approximately 4 to 5 feet bgs, and flows to the south-southwest, with a component to the east.

A total of 11 groundwater monitoring wells have been installed at the Site. Eight monitoring wells (MW1 through MW6, DP2, and DP5) were installed prior to 2003 (**Figure 3**). Among them, monitoring wells MW3 through MW6 were decommissioned in 2017. The other four monitoring wells (MW1, MW2, DP2 and DP5) appeared to be paved over or destroyed.

In July 2017, three monitoring wells (MW-1 through MW-3) were installed to a total depth of 15 feet bgs, and screened from 5 to 15 feet bgs (MW-1) or 3 to 13 feet bgs (MW-2 and MW-3). These monitoring wells are still active (**Figure 2**).

Water Supply: Drinking water for the area is supplied by the City of Kent. The City of Kent obtains drinking water from upland springs and wells located east of the Site on the Kent East Hill and from wells located in the Green River Valley north of the Site. The City of Kent also purchases water from City of Tacoma, which is sourced from the Green River watershed. None of these water supply sources are located within a 1-mile radius of the Property. The Property is also located outside of the 10-year time of travel wellhead protection area of all water supply wells.

According to Ecology's *Well Report* database, there are no water supply wells located within a 0.5-mile radius of the Property. The distance to the closest 10-year wellhead protection area (for East Hill Well 1) is approximately 1.2 miles east of the Property.

Release and Extent of Soil and Groundwater Contamination: Environmental Site investigations and remedial activities have been conducted at the Site since 1996.

- **December 1996:** Five shallow soil samples were collected from four locations (1, 2, 3, and 4) inside and outside of the former dry cleaners building at depths between 2 and 5 feet bgs (**Figure 4**). A PCE concentration exceeded the MTCA Method A soil cleanup level in soil sample 3 collected at 2 feet bgs near the west end of the former dry cleaning machine inside the building.

- **February 2000:** Eight shallow soil samples were collected from six locations (SS1 through SS4, B3 and B4) inside and outside of the former dry cleaners building at depths between 0.5 and 5 feet bgs (**Figure 4).** PCE concentrations exceeded the MTCA Method A soil cleanup level in SS2 through SS4 at 6 feet bgs, B3 at 2 feet bgs, and B4 at 2 and 5 feet bgs.

- **March and April 2000:** Thirteen soil borings (DP1 through DP12, and DP15) were installed near the former dry cleaners building. DP4 and DP9 were installed near former locations SS-4 and SS-3, respectively. Soil samples were collected between 3.5 and 10 feet bgs from all soil borings except DP2, DP5, and DP15. Groundwater samples were collected from all 13 soil borings. Except for DP8, soil samples collected from the other soil borings contained PCE and/or TCE concentrations above the MTCA Method A soil cleanup levels. Groundwater samples collected from soil borings DP4, DP7, DP9, and DP11 contained PCE and/or TCE concentrations above the MTCA Method A groundwater cleanup levels.

- **April and May 2002:** Approximately 1,500 tons of PCE-contaminated soil were excavated and removed from the Site. Excavation was completed to a depth of 6 feet bgs, with slightly greater depths along the southern boundary and on the southeastern portion of the excavation. A total of 38 soil samples were collected between 2 and 7 feet bgs. The remedial excavation limits and confirmation soil sample locations are depicted on **Figure 4**. Two soil samples collected from the bottom of eastern portion of the excavation contained PCE and/or TCE concentrations above the MTCA Method A soil cleanup levels: C10-5' at 5 feet bgs and E10-5.5' at 5.5 feet bgs.

- **August 2014:** An activity was conducted to locate and survey eight previously installed monitoring wells MW1 through MW6, DP2, and DP5 (**Figure 3**). Among them, monitoring well DP2 and MW4 were found to be in poor condition. Only three monitoring wells (MW1 through MW3) were surveyed, inspected, and sampled. The groundwater samples collected from monitoring wells MW1 and MW2 contained TPHd plus TPHo concentrations above the MTCA Method A groundwater cleanup level. The groundwater samples collected from monitoring wells MW2 and MW3 contained vinyl chloride (VC) concentrations above the MTCA Method A groundwater cleanup level.

- **October and November 2015**: A total of 25 soil borings (B-11 through B-35) were installed at the Site, with two soil boring (B-19 and B-20) on West Meeker Street (**Figure 5**).

    - A total of 77 soil samples were collected from these soil borings between 2 and 15 feet bgs. Soil samples were analyzed for TPHd and TPHo. Ten of the soil samples, collected from soil borings B-11 through B-20, were additionally analyzed for volatile organic compounds (VOCs).

    - A PCE concentration was detected above the MTCA Method A soil cleanup level in the soil sample collected at 5 feet bgs from soil boring B-13.

    - The TPHd plus TPHo concentrations were detected above the MTCA Method A soil cleanup level in the following soil samples: B-13, B-15, and B-16 at 5 feet bgs, B-24, B26, and B-34 at 2 and 4 feet bgs, B-28 and B-32 at 2 feet bgs.

    - A total of 13 groundwater samples were collected from soil borings B-11 through B-23. All groundwater samples were analyzed for TPHd and TPHo. Ten of the groundwater samples, collected from soil borings B-11 through B-20, were additionally analyzed for VOCs.

    - The VC concentrations were detected above the MTCA Method A groundwater cleanup level in soil borings B-15 and B-17. A cis-1,2-dichloroethene (cis-1,2-DCE) concentration was detected above the MTCA Method B groundwater cleanup level in soil boring B-17.

    - The TPHd plus TPHo concentrations were detected above the MTCA Method A groundwater cleanup level in soil borings B-15, B-16, and B-17.

- **February and March 2017:** Remedial excavations were performed at the Site.

    - A total of 2,169.33 tons of petroleum hydrocarbon-contaminated soil was removed from the Site. The excavation extended to 5 to 5.5 feet bgs. A total of 38 soil samples were collected from the final excavation limits and analyzed for TPHd and TPHo. The remedial excavation limit and soil sampling locations are depicted on **Figure 6**.

    - Three soil samples contained TPHd plus TPHo concentrations above the MTCA Method A soil cleanup level: a south sidewall sample at 3.5 feet bgs (B17-SSW-1:3.5), a south sidewall sample at 2 feet bgs (B13-SSW-1:2), and a west sidewall sample at 3 feet bgs (C7-WSW-1:3).

    - An additional 25.23 tons of PCE-contaminated soil were removed from two small areas at the Site. The excavations extended to approximately 6 feet bgs. The excavation limit and soil sampling locations for PCE contamination are depicted on **Figure 7**.

    - A total of 7 soil samples were collected from the final PCE excavation limits. All 7 soil samples were analyzed for VOCs. All VOC concentrations were below the MTCA Method A soil cleanup levels.

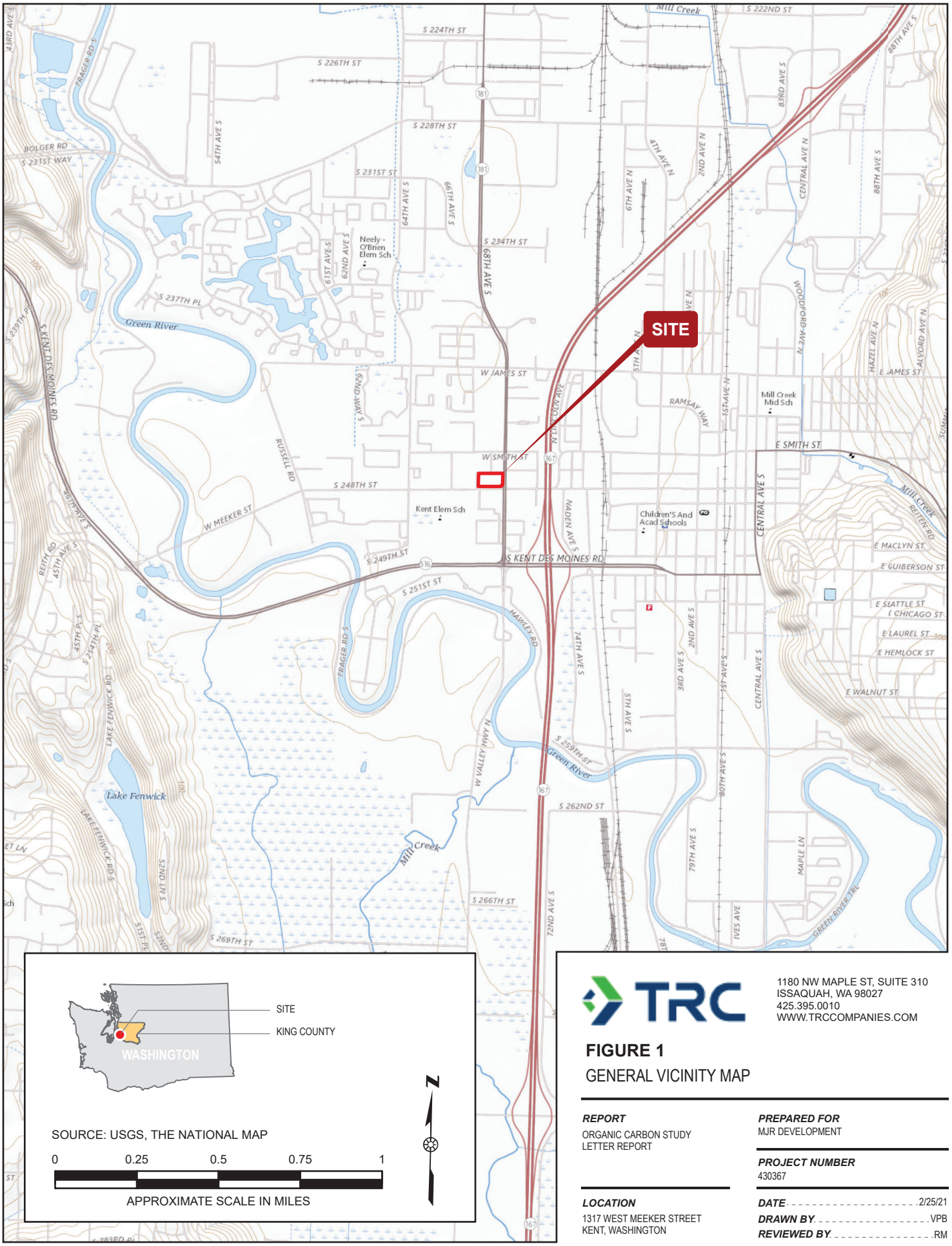
- **July 2017 to October 2018:** Three monitoring wells (MW-1 through MW-3) were installed at the Site in July 2017 (**Figure 2**). Quarterly groundwater monitoring was performed at these three monitoring wells from July 2017 to October 2018. A VC concentration exceeded the MTCA Method A groundwater cleanup level in monitoring well MW-2 in October 2017. As of October 2018, HVOC concentrations have been below the MTCA Method A groundwater cleanup levels for four consecutive quarters in all three monitoring wells. However, TPHd plus TPHo concentrations were still above the MTCA Method A groundwater cleanup level in monitoring wells MW-1 and MW-2.

- **November 2019:** Groundwater samples were collected from monitoring wells MW-1 and MW-2. The groundwater samples were analyzed for BTEX, fuel additives, total naphthalenes, extractable and volatile petroleum hydrocarbons (EPH and VPH), and hexane. All concentrations were below the PQL.

- **June 2020:** Three soil borings (DP16 through DP18) were advanced up-gradient of the contaminated groundwater plume (**Figure 2**). Groundwater samples were collected from each soil boring and analyzed for TPHd, TPHo, and TOC. Concentrations of TPHd and TPHo were below PQL. TOC concentrations ranged from 1,040 µg/L to 4,430 µg/L.

Site Diagrams

Enclosure A: Figure 1



SOURCE: USGS, THE NATIONAL MAP

0 0.25 0.5 0.75 1

APPROXIMATE SCALE IN MILES

N

1180 NW MAPLE ST, SUITE 310
ISSAQUAH, WA 98027
425.395.0010
WWW.TRCCOMPANIES.COM

FIGURE 1

GENERAL VICINITY MAP

REPORT
ORGANIC CARBON STUDY
LETTER REPORT

PREPARED FOR
MJR DEVELOPMENT

PROJECT NUMBER
430367

LOCATION
1317 WEST MEEKER STREET
KENT, WASHINGTON

DATE 2/25/21
DRAWN BY VPB
REVIEWED BY RM

Enclosur A: Figure 2

TRC

1180 NW MAPLE ST, SUITE 310
ISSAQUAH, WA 98027
425.395.0010
WWW.TRCCOMPANIES.COM

FIGURE 2

SITE REPRESENTATION

REPORT
ORGANIC CARBON STUDY LETTER REPORT

PREPARED FOR
MJR DEVELOPMENT

PROJECT NUMBER
430367

LOCATION
1317 WEST MEEKER STREET
KENT, WASHINGTON

DATE 2/25/21
DRAWN BY ..... VPB
REVIEWED BY ..... RM

Enclosure A: Figure 3

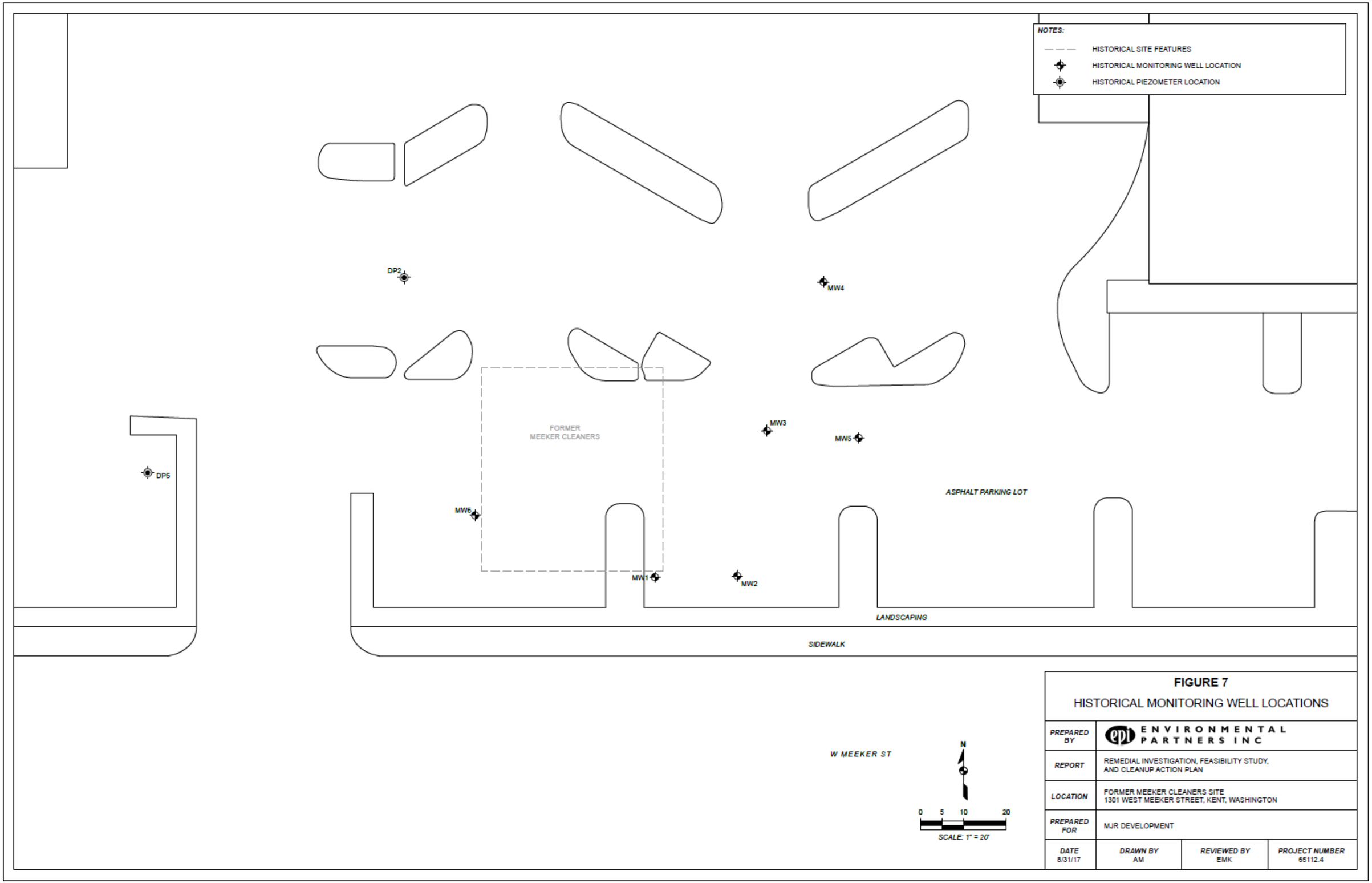


FIGURE 7

HISTORICAL MONITORING WELL LOCATIONS

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	REMEDIAL INVESTIGATION, FEASIBILITY STUDY, AND CLEANUP ACTION PLAN		
LOCATION	FORMER MEEKER CLEANERS SITE 1301 WEST MEEKER STREET, KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE 8/31/17	DRAWN BY AM	REVIEWED BY EMK	PROJECT NUMBER 65112.4

Enclosure A: Figure 4

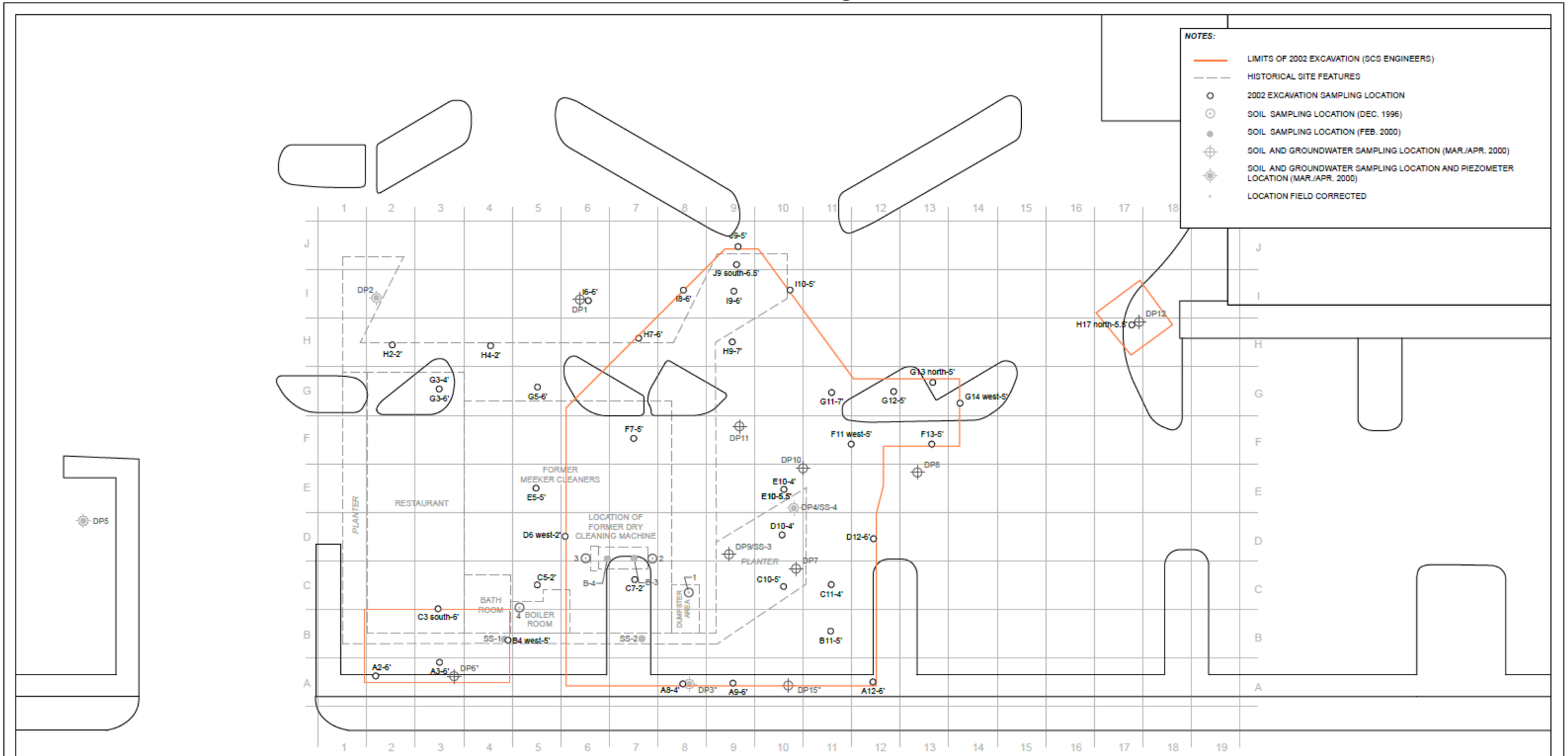


FIGURE 5
2002 REMEDIAL EXCAVATION
SAMPLING LOCATIONS

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	REMEDIAL INVESTIGATION, FEASIBILITY STUDY, AND CLEANUP ACTION PLAN		
LOCATION	FORMER MEEKER CLEANERS SITE 1301 WEST MEEKER STREET, KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE 9/6/17	DRAWN BY AM	REVIEWED BY EMK	PROJECT NUMBER 65112.4

Enclosure A: Figure 5

ICHI TERIYAKI

MEEKER CLEANERS
(DROP-OFF LOCATION)

NOTES:

- LIMITS OF 2002 EXCAVATION (SCS ENGINEERS)
- APPROXIMATE SOIL BORING LOCATIONS (2015 INVESTIGATION)
- 2002 FINAL CONFIRMATION SAMPLING LOCATION
- SOIL SAMPLING LOCATION (DEC. 1996)
- SOIL AND GROUNDWATER SAMPLING LOCATION (MAR./APR. 2000)
- SOIL AND GROUNDWATER SAMPLING LOCATION AND PIEZOMETER LOCATION (MAR./APR. 2000)
- GREEN — INDICATES SOIL SAMPLING LOCATION WITH ALL CONTAMINANT CONCENTRATIONS LESS THAN THE APPLICABLE CLEANUP LEVELS
- RED — INDICATES SOIL SAMPLING LOCATION WITH ONE OR MORE CONTAMINANT CONCENTRATIONS EXCEEDING THE APPLICABLE CLEANUP LEVELS

SAMPLE IDENTIFICATION

B-13

DEPTH	DRO	ORO	PCE
5	310 x	**4,000**	**0.072**

BOLD INDICATES COMPOUND WAS DETECTED

SHADED CELL INDICATES THAT COMPOUND WAS DETECTED AT A CONCENTRATION GREATER THAN THE CLEANUP LEVEL

X - THE SAMPLE CHROMATOGRAPHIC PATTERN DOES NOT RESEMBLE THE FUEL STANDARD USED FOR QUANTITATION.

DRO DIESEL-RANGE ORGANICS
ORO OIL-RANGE ORGANICS
PCE TETRACHLOROETHENE

ALL RESULTS PRESENTED IN MILLIGRAMS PER KILOGRAMS (mg/kg)

B-32

DEPTH	DRO	ORO	PCE
2	85 x	**2,200**	NA
4	<50	<250	NA
6	<50	<250	NA
8	<50	<250	NA
10	<50	<250	NA
15	<50	<250	NA

B-13

DEPTH	DRO	ORO	PCE
5	310 x	**4,000**	**0.072**

B-34

DEPTH	DRO	ORO	PCE
2	190 x	**3,600**	NA
4	200 x	**3,600**	NA
6	<50	<250	NA
8	<50	<250	NA
10	<50	<250	NA

B-15

DEPTH	DRO	ORO	PCE
5	260 x	**4,700**	**0.035**

E10-5.5' (4/11/02)

DEPTH	DRO	ORO	PCE
5.5	--	--	**0.44**

B-26

DEPTH	DRO	ORO	PCE
2	270 x	**4,300**	NA
4	290 x	**4,600**	NA
6	<50	<250	NA
8	<50	<250	NA
10	<50	<250	NA
15	<50	<250	NA

B-16

DEPTH	DRO	ORO	PCE
5	300 x	**3,200**	NA

C10-5' (4/10/02)

DEPTH	DRO	ORO	PCE
5	--	--	**0.33**

B-24

DEPTH	DRO	ORO	PCE
2	490 x	**4,200**	NA
4	330 x	**4,800**	NA
6	<50	<250	NA
8	<50	<250	NA
10	<50	<250	NA
15	<50	<250	NA

B-28

DEPTH	DRO	ORO	PCE
2	290 x	**2,600**	NA
4	<50	<250	NA
6	<50	<250	NA
8	<50	<250	NA
10	<50	<250	NA

W MEEKER ST

N

0 7.5 15 30

SCALE: 1" = 30'

FIGURE 8
SOIL SAMPLING LOCATIONS AND ANALYTICAL RESULTS, 2015 INVESTIGATION

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	REMEDIAL INVESTIGATION, FEASIBILITY STUDY, AND CLEANUP ACTION PLAN		
LOCATION	FORMER MEEKER CLEANERS SITE 1301 WEST MEEKER STREET, KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE 9/6/17	DRAWN BY AM	REVIEWED BY EMK	PROJECT NUMBER 65112.4

Enclosure A: Figure 6

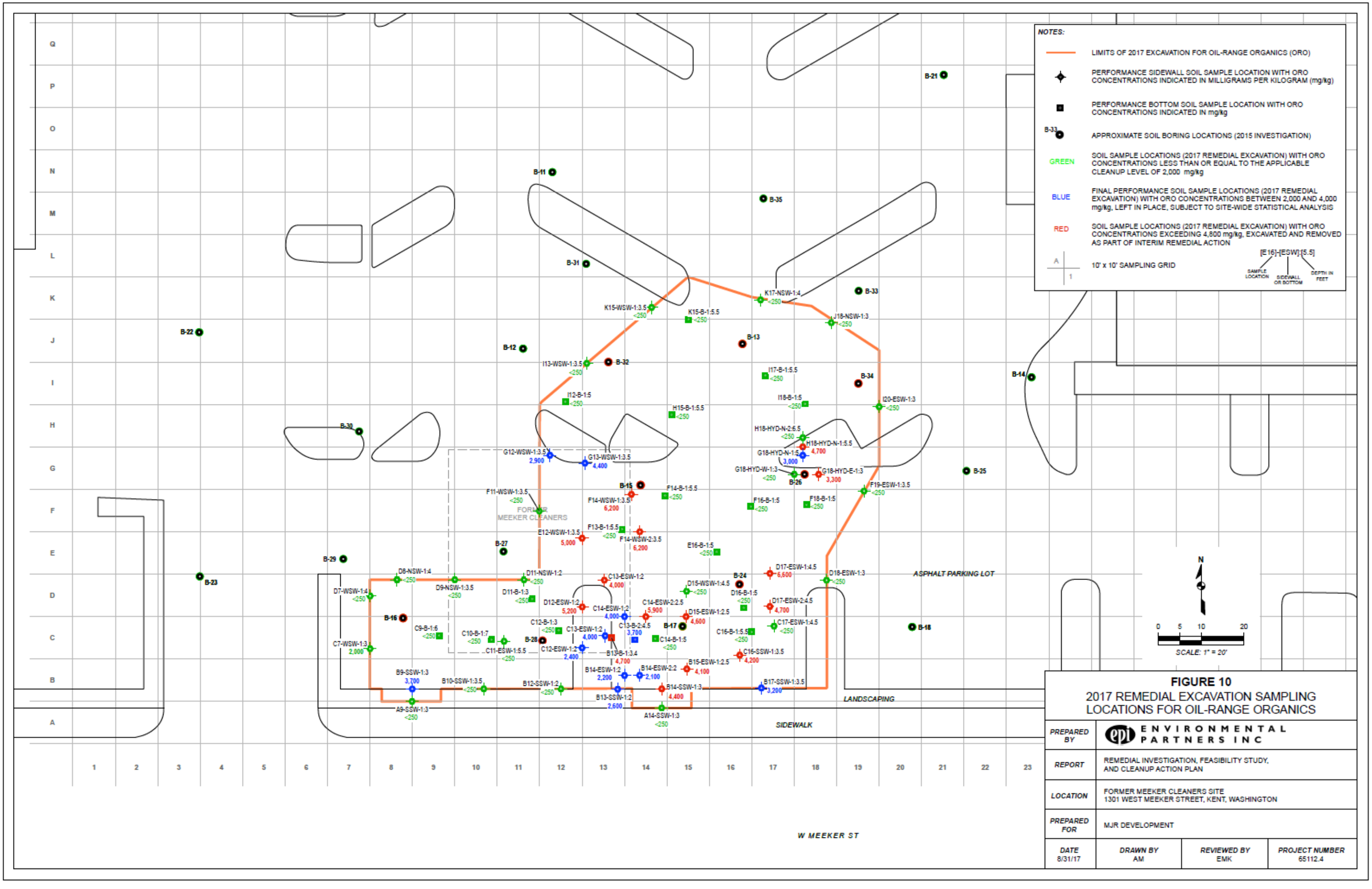


FIGURE 10
2017 REMEDIAL EXCAVATION SAMPLING LOCATIONS FOR OIL-RANGE ORGANICS

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	REMEDIAL INVESTIGATION, FEASIBILITY STUDY, AND CLEANUP ACTION PLAN		
LOCATION	FORMER MEEKER CLEANERS SITE 1301 WEST MEEKER STREET, KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE 8/31/17	DRAWN BY AM	REVIEWED BY EMK	PROJECT NUMBER 65112.4

Enclosure A: Figure 7

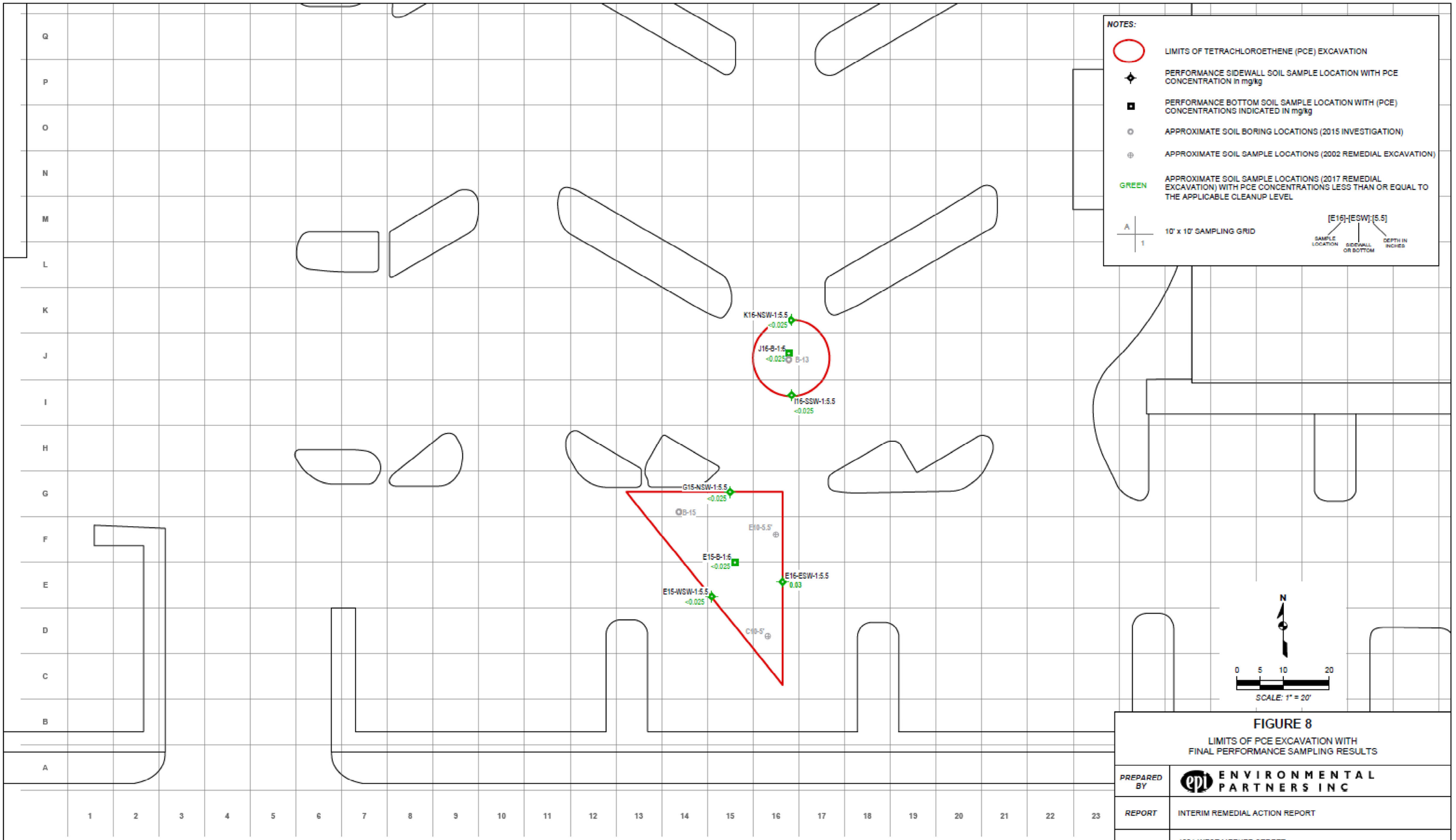


FIGURE 8

LIMITS OF PCE EXCAVATION WITH
FINAL PERFORMANCE SAMPLING RESULTS

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	INTERIM REMEDIAL ACTION REPORT		
LOCATION	1301 WEST MEEKER STREET KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE 8/15/17	DRAWN BY AM	REVIEWED BY EMK	PROJECT NUMBER 65112.3