



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 13, 2012

Mr. Karl Westermann
Avis Rent A Car System, LLC
6 Sylvan Way
Parsippany, NJ 07054

Re: No Further Action at the Following Site:

- **Site Name:** Avis Headquarters-Seattle
- **Site Address:** 18811 16th Avenue South, SeaTac, WA
- **Facility/Site Number:** 32197393
- **VCP Project Number:** NW2614
- **ISIS Cleanup Number:** 8702

Dear Mr. Westermann:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the former **Avis Headquarters-Seattle** 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:



- Total petroleum hydrocarbons as diesel (TPH-D) and motor oil (TPH-O) in soil and in ground water (1992).

These contaminants were discovered and reported in January 1992 as part of a tank removal and replacement project. The source of the release is unknown. Two tanks storing new and used motor oil were installed in a common excavation but the orientation of the tanks is not available from the reports. The highest reported concentration of heavy-oil range petroleum hydrocarbons was 380,000 mg/kg. in soil.

- Total petroleum hydrocarbons as TPH-D and TPH-O in soil.

This release was discovered in February 2012 and was associated with the removal of two hydraulic lifts referred to as the north and south cylinders. Only the northern cylinder had failed. Soil concentrations of diesel (TPH-D) and motor oil (TPH-O) in the vicinity of the north cylinder were: 4600 mg/kg and 1800 mg/kg, respectively

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.

Basis for the Opinion

This opinion is based on the information contained in the documents listed below:

1. June 20, 2012. ***Decommissioning Report***. AMEC.
2. March 26, 2012. ***Site Assessment for Removal of UST***. AMEC.
3. June 1, 1992. ***Environmental Site Assessment***. B & C Equipment Co.

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 e-mailing a request 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 above and in **Enclosure A**.

2. Establishment of cleanup standards

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

Soil

The Site is located in an area zoned for industrial or Aviation Operations. Neighboring properties to the south are a mix of office parks and light manufacturing. Soil cleanup levels suitable for unrestricted land uses are therefore applicable to this Site. Method A cleanup levels are protective of this use and have been selected for this cleanup. The applicable point of compliance for soil under these conditions is throughout the Site and at least 15 feet below ground surface (bgs) based on human exposure by through direct contact or other exposure pathways where contact with soil is required to complete the pathway.

Soil cleanup levels protective of ground water are also required and MTCA Method A cleanup levels have been selected.

Cleanup levels protective of other media (air, surface water, sediment) are not required based on the relatively low contaminant concentrations documented at the Site.

Soil cleanup levels protective of terrestrial ecological receptors are also not required based on a simplified terrestrial evaluation (TEE). There are no parks or significant areas of undeveloped land within 500 feet of the Site. A simplified TEE exposure analysis using WAC 173-340-7492 (2)(a)(ii) and Table 749-1 indicates no further need for an ecological evaluation. Therefore, establishment of more stringent soil cleanup levels are not required because "land use at the Site and surrounding area makes substantial wildlife exposure unlikely".

MTCA Method A cleanup levels for petroleum organics in soils are tabulated in Table 740-1. Selected values from that table are repeated here for reference. Gasoline as TPH-G: 100 mg/kg for gasoline mixtures without benzene and the total of ethylbenzene,

toluene and xylenes are less than 1% of the gasoline mixture; or 30 mg/kg for all other GRPH mixtures. Diesel as TPH-D: 2000 mg/kg. heavy oils as TPH-O: 2000 mg/kg; For Volatile Organic Compounds (VOC's) the values are benzene: 30 µg/kg; toluene: 7000 µg/kg; ethylbenzene: 6000 µg/kg; xylenes: 9000 µg/kg. Lead in soil is 250mg/kg.

Ground Water

MTCA Method A cleanup level for petroleum organics in ground water are tabulated in Table 720-1. Selected values from that table are repeated here for reference and comparison. For gasoline with no detectable benzene in groundwater: 1000 µg/l; diesel: 500 µg/l; heavy oils: 500 µg/l; benzene: 5 µg/l; toluene: 1000 µg/l; ethyl-benzene: 700µg/l; total xylenes: 1000 µg/l. Cleanup levels for lead in groundwater 15 µg/l.

3. Selection of cleanup action

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

The selected cleanup consisted of excavation of the contaminated soil and conformational sampling.

Ground water requires no remediation as sampling results do not confirm impacts to ground water.

4. Cleanup

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

In December 1991, B & C Equipment removed one 12,000 gallon gasoline tank (Tank 1) from the Property. Three soil samples were collected from the excavation. No release was reported as all analytical results were below their respective reporting limits. A replacement tank (Tank 4) was installed in January 1992 in approximately the same location as Tank 1.

On January 27, 1992, two 500 gallon UST's (Tank 2 and Tank 3) were removed. Tank 2 was used to store new motor oil; Tank 3 was used for waste motor oil. Soil concentrations as TPH-D and TPH-O exceeded reporting limits. Additional excavation was completed in this area on March 5, 1992. All of the confirmation soil samples from the extended excavation were below the reporting limits for TPH-D. A sheen was present on the accumulated ground water in the excavation. After pumping the

accumulated water, the excavation was allowed to recharge. Recharge was described as relatively rapid. A sample of this water was collected and tested for TPH (8015 modified). Because the concentration of TPH in this grab sample was 9.9 mg/l, installation of two ground monitoring wells was recommended by B & C to investigate possible extended impacts to ground water. These monitoring wells were, however, not installed.

On December 6, 2012, AMEC sampled the soil and ground water in the vicinity of the former 500 gallon tanks (Tanks 2 & 3). Two boring (ASB1 and ASB2) were advanced to 16 feet; ground water was present at approximately 11.5 to 12 feet. Four soil samples and two ground water samples collected from these boring were analyzed for TPH using the NWTPH-HCID analytical methods. Concentrations of TPH-G, TPH-D and TPH-O in all of the samples were reported as non-detect.

Removal of Tank 4 began in February 2012 and was completed in March 2012. None of the six soil samples taken from the piping trenches or the three samples from the excavation exceeded the respective reporting limits.

On February 23, 2012, two hydraulic hoist cylinders were removed. The south cylinder was structurally sound; the north cylinder was rusted and leaking. On March 1, 2012, the impacted soil in the vicinity of the north cylinder was removed. The final excavation was six feet wide, eight feet long, and nine feet deep. Approximately 18 tons of Class 3 soils were removed and transported off-Site for disposal.

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List (ISIS Cleanup #: 8702) and our Leaking Underground Storage Tank List (Release#: 6132).

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.

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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.

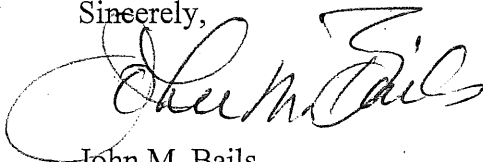
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

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 2580).

For more information about the VCP and the cleanup process, please visit our website: 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 (425) 649-7099 or e-mail at jbai461@ecy.wa.gov.

Sincerely,



John M. Bails
Toxics Cleanup Program

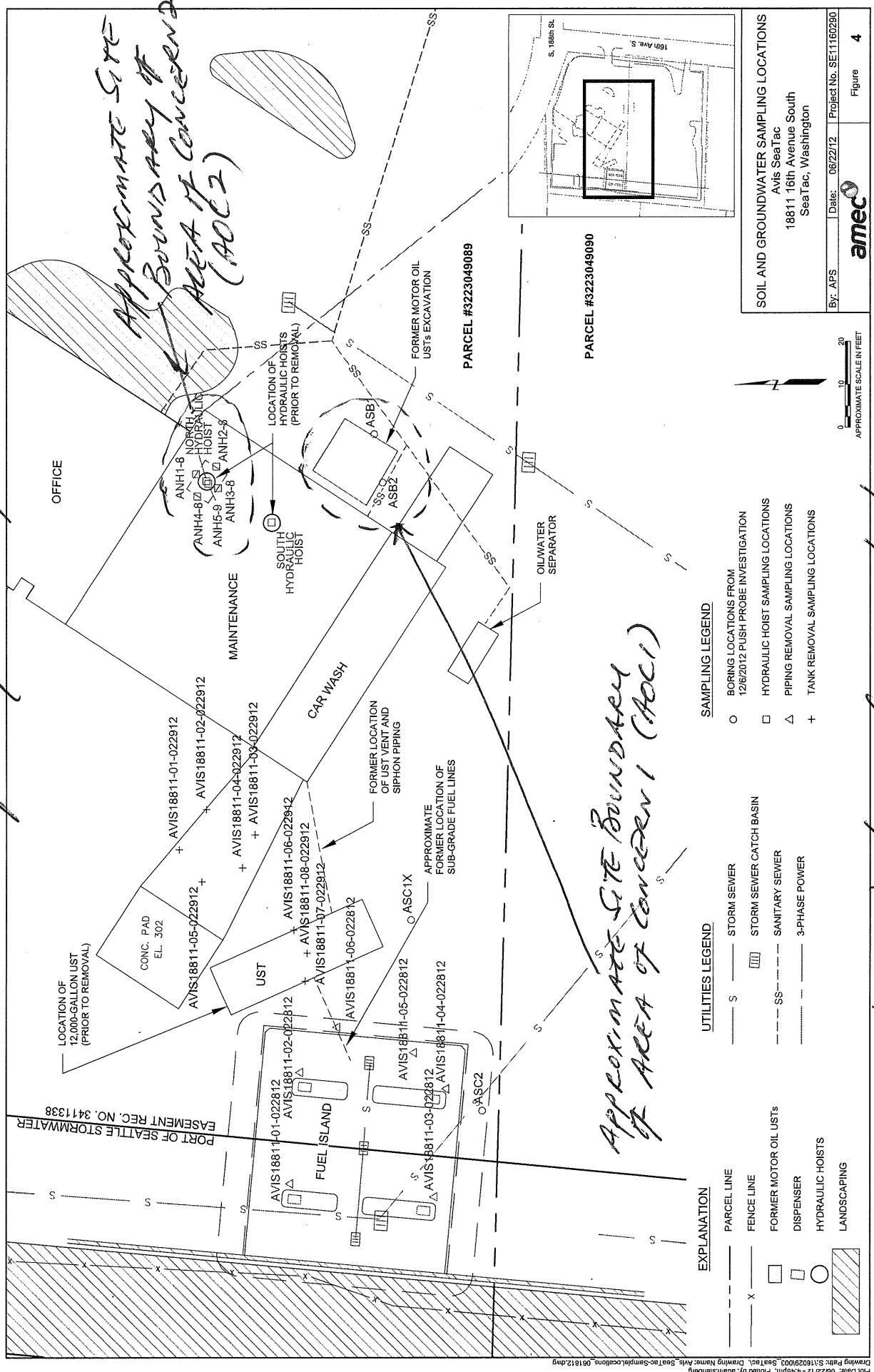
Enclosure (1): A. Description and Diagrams of the Site & Property

cc: John Long, Senior Hydrogeologist, AMEC
Dolores Mitchell, VCP Financial Manager, Ecology

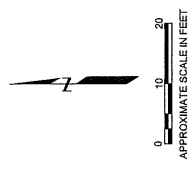
Enclosure A
Description and Diagrams of the Site

AVIS HEADQUARTERS-SEATTLE
NW2614

*Enclosure A
Site and Property Description*



- EXPLANATION**
- PARCEL LINE
 - - - FENCE LINE
 - FORMER MOTOR OIL UST'S
 - DISPENSER
 - HYDRAULIC HOISTS
 - ▨ LANDSCAPING
- UTILITIES LEGEND**
- S --- STORM SEWER
 - ▤ STORM SEWER CATCH BASIN
 - - - SS - - - SANITARY SEWER
 - 3-PHASE POWER ---
- SAMPLING LEGEND**
- BORING LOCATIONS FROM 12/6/2012 PUSH PROBE INVESTIGATION
 - HYDRAULIC HOIST SAMPLING LOCATIONS
 - △ PIPING REMOVAL SAMPLING LOCATIONS
 - + TANK REMOVAL SAMPLING LOCATIONS



SOIL AND GROUNDWATER SAMPLING LOCATIONS
 Avis SeaTac
 18811 16th Avenue South
 SeaTac, Washington

By: APS Date: 06/22/12 Project No. SE11160290
 amec
 Figure 4

John Bots, Ecology, 11/13/2012

Site Description

Site Name: AVIS Headquarters-Seattle

Site Address: 18811 16th Avenue South, SeaTac, WA

Site and Property Description:

The Site is defined as the extent of contamination associated with two distinct releases at the Property. These are termed Areas of Concern (AOC) in this letter for purposes of clarity. The two AOC's are shown on the attached Site Plan, **Enclosure A** as AOC1 and AOC2. The extent of this soil contamination defines the Site which is located within a Property (the Property) listed by Ecology as the AVIS Headquarters (ISIS # 8702 and LUST #3001).

Area Description:

The Property is located directly south of Seattle-Tacoma International Airport. Runways for the airport lie to the north and east. The surrounding properties are zoned for either industrial or aviation operations. Building to the west and south are a mix of office parks and light manufacturing.

The Site and Property are shown in the **Enclosure A**.

Property History and Current Use:

Since 1979, the Property has been used as a car rental and maintenance facility. Underground storage tanks at the Site were used to store gasoline, motor oil and waste oil. These three UST's were removed between December 1991 and January 1992. These tanks had been in service since 1978. Only the gasoline tank was replaced with a new 12,000 gallon tank. It was installed in the same cavity as the former tank in January 1992. This second generation tank, itself, was removed in February-March 2012. All of the auxiliary equipment associated with fuel distribution was also removed. The dispenser island canopy is the only existing structure remaining on Site that was associated with the refueling operations.

The Property had been vacant for sometime but was sold to Graham Real Ventures in September 2012.

Physiographic Setting:

The Property lies on the Des Moines Drift Upland, a glacially sculpted, north/south-trending upland plateau steeply bordered Puget Sound to the west and the Duwamish River Valley to the east (Aspect, 2005). The area around the Property is generally flat, with a gradual slope to the southwest. The elevation of the Property itself ranges between approximately 290 and 305 feet above mean sea level (msl) with a slope of approximately 5 to 7 degrees toward the southwest.

Surface/Storm Water System:

A Port of Seattle stormwater conveyance and easement runs north to south through the length of the Property. The storm water conveyance is located approximately 12 to 15 feet underneath the fuel dispenser island canopy. Two storm sewer line conveyances collect storm water runoff from the Property. One storm sewer runs to the south from the canopy area in the southwest corner of the Site. The other storm sewer consists of two lines encircling all but the northeast corner of the building with the lines joining in the center, south of the Property and running east to 16th Avenue South.

Ecological Setting:

The Property comprises nearly 2 acres. Improvements to the Property consist of a main building, the maintenance facility /office complex, and the Canopy. Otherwise the Property is fully paved with asphalt. Neighboring properties are primarily warehouses or previously developed properties which have been cleared for use as airport clear zones.

There are no parks or other areas of natural habitat in the immediate vicinity of the Property.

Geology:

The Property has been mapped as a recessional outwash deposit associated with the retreat of the Vashon ice sheet during the most recent glaciations (Aspect, 2005). Recessional outwash deposits are fluvial deposits consisting of sand, gravel, and silty sand. Brown poorly graded sand or brown silt was observed during a push-probe investigation in December 2011 and during the excavation of Tank 4 in February 2012 consistent with the expected recessional outwash deposits. The push-probe investigations encountered refusal at depths approaching 16 feet below ground surface (bgs) representing the transition to the more indurate Vashon lodgment till deposits.

Ground Water:

Principal ground water aquifers in the vicinity of the Site generally occur in perched recessional outwash deposits overlying glacial till and within advanced outwash sands and gravel underlying the till. Ground water is reported in the vicinity at depths of 12 feet below ground surface (bgs). Based on the surface topography, ground water flow direction is expected to be to the south.

Release and Extent of Contamination—Soil:

One release was associated with the removal of two 500 gallon UST's in January 1992. Initially, four soil samples were collected for analysis. The maximum concentrations of Diesel (TPH-D) and motor oil(TPH-O) were reported as 39,000 mg/kg and 380,000 mg/kg, respectively. After over-excavation, the confirmation samples were non-detect.

A second release was associated with the removal of two hydraulic lift cylinders in February 2012. Soil at the north lift was impacted; soil at the south lift was not. The maximum concentrations for TPH-D and TPH-O were 4,600 mg/kg and 1800 mg/kg. After over-excavation, confirmation samples were less than the method detection limit.

Release Extent of Contamination—Ground Water:

One release to ground water was associated with the removal of two 500 gallon UST's in January in 1992. A sample of excavation pit water indicated a TPH concentration of 9.9 mg/l. Installation of two monitoring wells was recommended to characterize the possible impacts. No wells were installed. Investigation of the ground water occurred in February 2012. No impacts were reported.