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DEPARTMENT OF ECOLOGY
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October 26, 2021

Cindy Schrader
MC Schrader LLC
120 Corrin Ave NW
Orting, WA 98360
CSchrader@dndconstructioninc.com

Re: No Further Action opinion for the following contaminated Site

Site name: Former Orting School District Bus Garage
Site address: 225 Van Scoyoc Ave, Orting, Pierce County, WA 98360
Facility/Site ID: 92862578
Cleanup Site ID: 2632
VCP Project No.: SW1713

Dear Cindy Schrader:

The Washington State Department of Ecology (Ecology) received your request for an opinion on the sufficiency of your independent cleanup of the Former Orting School District Bus Garage facility (Site) under the [Voluntary Cleanup Program \(VCP\)](#)¹ on May 16, 2021.² This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), chapter [70A.305](#)³ RCW.

Opinion

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

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in chapter 70A.305 RCW and chapter [173-340](#)⁴ WAC (collectively called "MTCA").

¹ <https://www.ecy.wa.gov/vcp>

² All Site data have been uploaded and accepted in to Ecology's Information Management System database (EIM).

³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

⁴ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

Site Description

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

- Total Petroleum Hydrocarbons as Gasoline Range Organics (TPH-GRO) into soil.
- Total Petroleum Hydrocarbons as Diesel Range Organics (TPH-DRO) into soil and groundwater.
- Tetrachloroethylene (PCE) into groundwater and soil gas.

Enclosure A includes a Site description, history, and diagrams of the Site using information from Ecology's files.

A parcel of real property can be affected by releases from multiple sites. At this time, Ecology has no information that other sites affect the parcel(s) associated with this Site.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in Enclosure C. You can request these documents by filing a [records request](#).⁵ For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on the [cleanup site search webpage](#).⁶

This opinion is void if any of the information contained in the 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. Ecology bases its conclusion on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. Enclosure A describes the Site.

Vapor Intrusion Sampling

Ecology has reviewed the information presented in the May 16, 2021, *Response to Further Action Letter* and concurs that no further evaluation of the vapor pathway is needed.

⁵ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁶ <https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=2632>

This conclusion is based on review of the Site data and Ecology's [Implementation Memorandum No. 14](#).⁷ The concentration and depth of remnant petroleum products are unlikely to cause a petroleum vapor intrusion risk.

Updated Terrestrial Ecological Evaluation

Ecology has reviewed the updated Terrestrial Ecological Evaluation (TEE) for the Site and concurs with its conclusion. The TEE ends as the Site qualifies for an exclusion due to remnant soil contamination being at least 15 feet below ground surface (bgs).⁸

Setting cleanup standards

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

Cleanup Standards: Under MTCA, cleanup standards consist of three primary components; (a.) cleanup levels,⁹ (b.) points of compliance,¹⁰ and (c.) applicable state and federal laws.¹¹

- a. **Cleanup Levels.** Ecology concurs with these proposed cleanup levels (CULs) for the Site: For soils, this cleanup uses the generic Method B TPH cleanup level set forth in Ecology's [Model Remedies for Sites with Petroleum Impacts to Groundwater](#).¹² Specifically, Model Remedy number 5 is being applied to the Site. Use of the generic Method B TPH value is approved for sites utilizing the model remedy process and soil contamination is TPH-GRO or a petroleum mixture containing TPH-GRO. The generic Method B TPH soil CUL applies to total petroleum hydrocarbon mixture. For this Site, soil collected at 15 feet bgs from SP5 is observed to have a total TPH concentration of 540 milligrams per kilogram (mg/kg).

Method A groundwater CULs for TPH-GRO and TPH-DRO¹³ and Method B air CULs¹⁴ are being applied to the Site. Groundwater achieves the Method A CULs at all sampled locations. Ecology evaluates that sufficient time has elapsed for migration of TPH-GRO from soil to groundwater to occur. Given that measured groundwater detections of TPH-GRO do not exceed applicable Method A CULs, it is empirically demonstrated that leaching of TPH-GRO from soil to groundwater has not and is unlikely to cause an exceedance in the future.¹⁵

⁷ <https://apps.ecology.wa.gov/publications/documents/1609046.pdf>

⁸ WAC 173-340-7491(1)(a)

⁹ WAC 173-340-200 "Cleanup level."

¹⁰ WAC 173-340-200 "Point of Compliance."

¹¹ WAC 173-340-200 "Applicable state and federal laws," WAC 173-340-700(3)(c)

¹² <https://apps.ecology.wa.gov/publications/documents/1609057.pdf>

¹³ WAC 173-340-340-900 Table 720-1, Method A Cleanup Levels for Groundwater.

¹⁴ Method B Cancer Cleanup Levels for Air, www.ezview.wa.gov/Portals/_1987/Documents/Documents/CLARC_VI_MethodB.pdf

¹⁵ WAC 173-340-747(9)

Site Hazardous Substance	MTCA Cleanup Method	Soil Cleanup Level ^a	Groundwater Cleanup Level ^b	Air Cleanup Level ^c
Total Petroleum Hydrocarbons	B	1,500	--	--
TPH-GRO	A	--	1,000	--
TPH-DRO	A	2,000	500	--
Tetrachloroethylene (PCE)	A/A/B	0.05	5	9.615

^a Measured in milligrams per kilogram (mg/kg).

^b Measured in micrograms per liter (µg/L).

^c Measured in micrograms per cubic meter (µg/m³).

b. Points of Compliance. Points of compliance are the specific locations at the Site where cleanup levels must be attained. Ecology concurs with the following proposed points of compliance for the Site:

Media	Points of Compliance
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. ¹⁶ Cleanup levels met at a standard point of compliance.
Soil- Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. ¹⁷ Cleanup level met via empirical demonstration.
Soil-Protection of Plants, Animals, and Soil Biota	Based on ecological protection, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. ¹⁸ Cleanup level met via exemption.
Groundwater	Based on the protection of groundwater quality, the standard point of compliance 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. ¹⁹ Cleanup levels met for all wells at a standard point of compliance.
Air Quality	Based on the protection of air quality, the point of compliance is indoor and ambient air throughout the Site. ²⁰ Cleanup levels met at standard point of compliance.

c. Applicable State and Federal Laws. Ecology concurs that the generic Method B TPH cleanup level, Method B sub-slab soil gas cleanup level, and Method A cleanup levels are appropriate for this Site, after considering additional applicable state and federal laws. These state and federal laws did not require revising or reducing the proposed cleanup levels for the Site. Applicable laws are:

- MTCA Cleanup Regulations (chapter 173-340 WAC), Revised November 2013.
- Minimum Standards for Construction and Maintenance of Wells (chapter 173-160 RCW).

¹⁶ WAC 173-340-740(6)(d)

¹⁷ WAC 173-340-747

¹⁸ WAC 173-340-7490(4)(b)

¹⁹ WAC 173-340-720(8)(b)

²⁰ WAC 173-340-750(6)

Selecting the cleanup action

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA. The method of cleanup was source removal by excavation. This cleanup is utilizing Model Remedy No. 5 provided in Ecology's *Model Remedies for Sites with Petroleum Impacts to Groundwater*. Model Remedies do not require the development of feasibility studies and disproportionate cost analysis.²¹

Cleanup

Ecology has determined your cleanup meets the standards set for the Site. Cleanup was conducted in multiple phases. In 1996, approximately 268 cubic yards of petroleum contaminated soil (PCS) was excavated and removed from the adjoining residential property and Corrin Avenue right-of-way. In 2013, a total of 31.50 tons of PCS was removed from the Site.

The cleanup meets the requirements of 173-340-360(2) as follows:

- Protects human health and the environment.
- Complies with cleanup standards.
- Complies with applicable state and federal laws.
- Groundwater achieves cleanup levels at the standard point of compliance.
- Does not rely on use of institutional controls.
- Prevents or minimized present or future releases and migration of contaminants.
- Does not rely on dilution or dispersion.
- Does not use remediation levels.
- Uses permanent solutions to the maximum extent practicable.

²¹ Ecology, *Model Remedies for Sites with Petroleum Impacts to Groundwater*, December 2017. Chapter 4, B, (i)

Listing of the Site

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

Limitations of the Opinion

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).²²

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](#)²³ and WAC [173-340-545](#).²⁴

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](#)(6).²⁵

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. SW1713.

²² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

²³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

²⁴ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

²⁵ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me at (360) 407-6266 or Joseph.Kasperski@ecy.wa.gov.

Sincerely,



Joe Kasperski, LG
LUST Site Manager
Toxics Cleanup Program
Southwest Regional Office

JKK/tam

Enclosures (3): A – Site Description and Drawings
 B – Data Tables
 C – Basis for the Opinion: List of Documents

cc by email: Lannie Smith, Atlas Geosciences NW, lsmith@atlasgeonw.com
 Nicholas Acklam, Ecology, nicholas.acklam@ecy.wa.gov
 Tra Thai, TCP Operating Budget Analyst, tra.thai@ecy.wa.gov
 Fiscal, VCP Fiscal Analyst, ecyrevcp@ecy.wa.gov
 Ecology Site File

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Enclosure A

Site Description and Drawings

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Site Description

The property is located at 225 Van Scoyoc Avenue SW in Orting, WA, Pierce County tax parcel 656500630. The parcel is improved with a 3,000 square foot vehicle service garage and office area. Current property use is vehicle towing and repossession.²⁶

In 1996, a release from a diesel fuel above-ground storage tank²⁷ impacted shallow soils on the source property (225 Van Scoyoc), the northwest adjoining residential property (215 Van Scoyoc Avenue SW), and the Corrin Avenue right-of-way. Approximately 268 cubic yards of petroleum contaminated soil (PCS) was excavated and removed from the adjoining residential property and Corrin Avenue right-of-way. Excavation was not continued on the source property. Ecology determined No Further Action (NFA) was necessary to clean up the residential property or the right-of-way, but explicitly excluded 225 Van Scoyoc Avenue SW.

In 2013, a diesel spill was discovered by Department of Ecology and City of Orting stormwater personnel.²⁸ The spill was attributed to an attempted theft of fuel from vehicles stored at the property. In 2015, two remedial excavations to remove PCS associated with the 2013 spill were completed. In total, 31.50 tons of PCS was removed from the Site. The Tacoma Pierce County Health Department recommended an NFA determination upon completion of the 2015 remedial excavation.²⁹

In September 2019, a Phase I Environmental Site Assessment (ESA) was conducted for the Site on behalf of Heritage Bank. A number of recognized environmental conditions (RECs) were identified. A phase II ESA was conducted in January 2020 to further evaluate the RECs documented in the Phase I ESA. Work included a geophysical survey, soil borings and analytical sampling, and groundwater analytical sampling.

Laboratory analytical data indicated TPH-GRO concentrations in soil collected from SP5 that exceeded MTCA Method A screening values.³⁰ Groundwater collected from boring SP5 indicated detections of TPH-DRO and PCE, but neither constituent exceeded the MTCA Method A screening level. PCE was detected in groundwater below the MTCA Method A screening level in two locations, SP1 and SP5. Sub-slab soil gas³¹ was analyzed and indicated detections of air phase hydrocarbons, ethylbenzene, xylenes, and PCE. PCE soil gas data was compared to MTCA Method B screening levels and a site-specific total TPH screening level was calculated.

Further investigation of TPH-GRO and TPH-DRO detected at SP5 was completed in March 2020. Additional soil and groundwater data collected during this supplemental investigation³² sufficiently addressed data gaps and defined the vertical and horizontal extents of contamination.

²⁶ Atlas, *Phase I Environmental Site Assessment*, 9/9/2019. Subject Site Use.

²⁷ Atlas, *Phase I Environmental Site Assessment*, 9/9/2019. Regulatory Records Review, 215 Van Scoyoc Avenue.

²⁸ Atlas, *Phase I Environmental Site Assessment*, 9/9/2019. Regulatory Records Review, Orting Auto Repair & Towing.

²⁹ Atlas, *Phase I Environmental Site Assessment*, 9/9/2019. ERTS 643436, PDF pages 137-149.

³⁰ Atlas, *Focused Phase II Subsurface Investigation*, 3/2/2020. Section 3.3.1.

³¹ Atlas, *Focused Phase II Subsurface Investigation*, 3/2/2020. Section 3.3.3.

³² Atlas, *Supplemental Phase II Subsurface Investigation*, 4/12/2020.

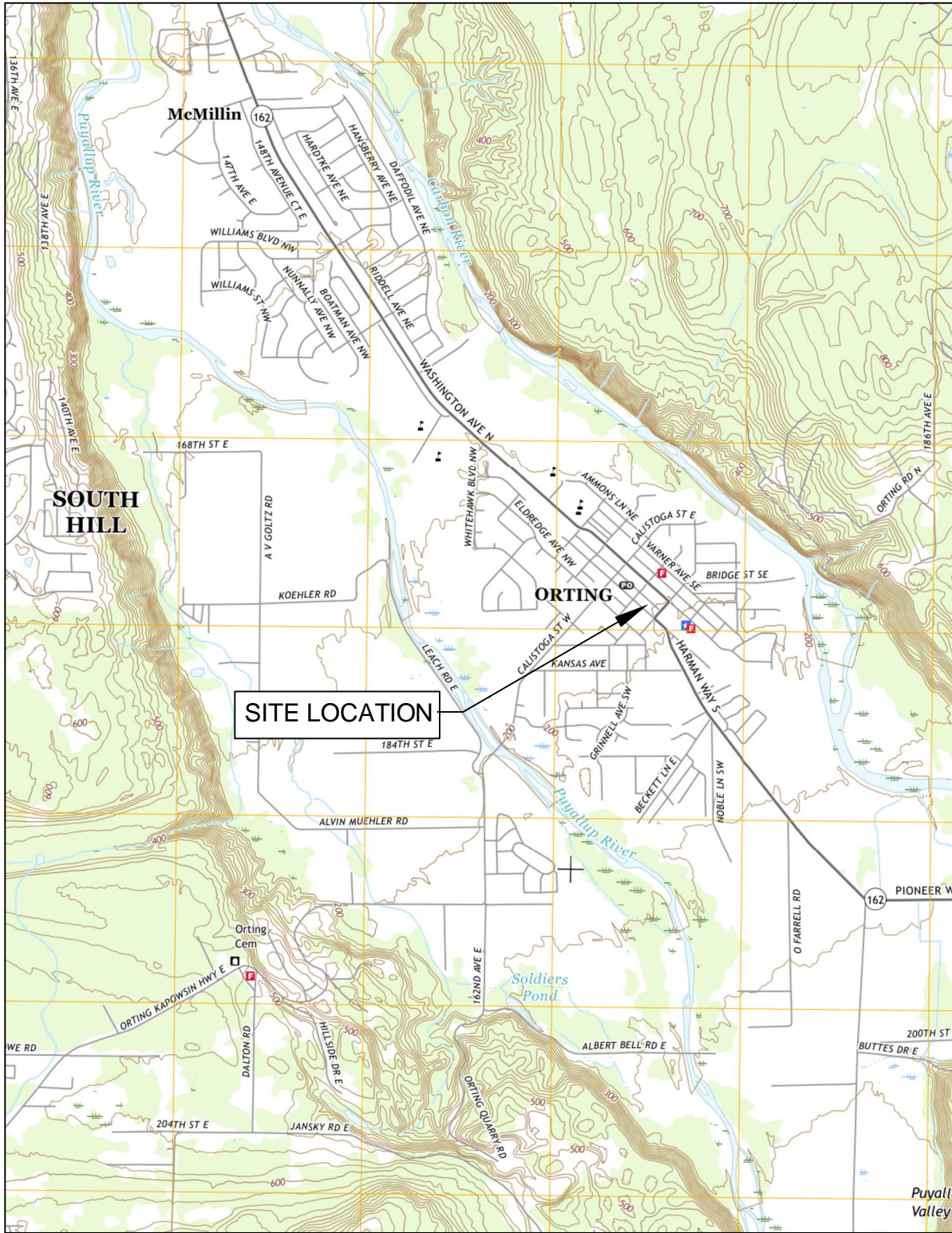
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Site Drawings

Figure 1 Site Vicinity Map

Figure 2 Site and Exploration Plan

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BASEMAP TAKEN FROM ORTING QUADRANGLE, ORTING WASHINGTON-PIERCE CO. 7.5-MINUTE SERIES 2017



**ATLAS
GEOSCIENCES
NW**
P.O. BOX 1009
SUMNER, WA 98390

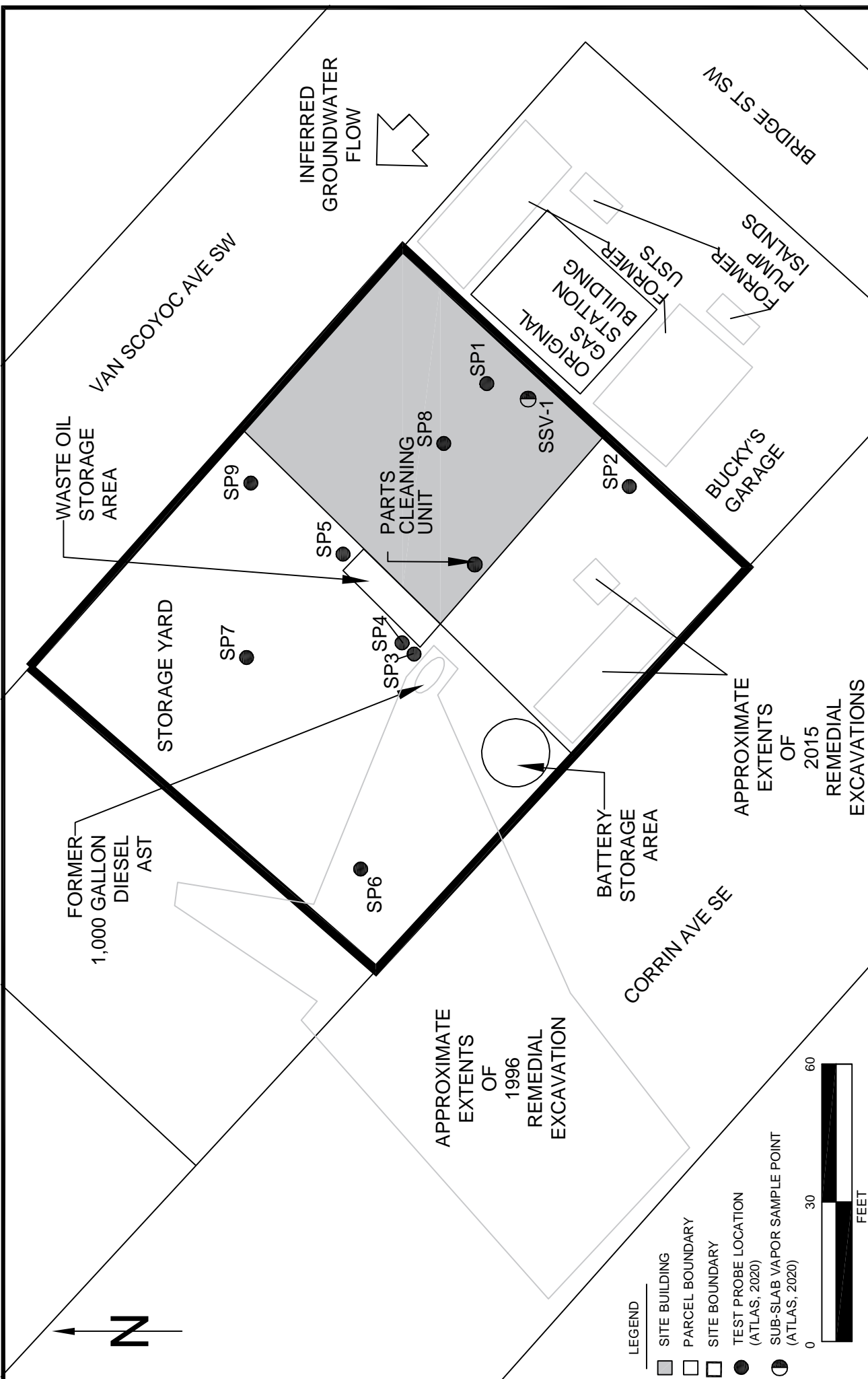
DRAWN BY: AL
PROJ. NO:
2019-041c
DATE:
JAN 2020
APPROX SCALE:
1:24,000
PRJ MGR: LS


SITE VICINITY MAP

FIGURE 1

MC SCHRADER PROPERTY
225 VAN SCOYOC AVENUE SW
ORTING, WASHINGTON

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 <p>ATLAS GEOSCIENCES NW P.O. BOX 1009 SUMNER, WA 98390</p>	<p>SITE ANDEXPLORATION PLAN</p>	<p>FIGURE 2</p>
	<p>MC SCHRADER PROPERTY 225 VAN SCOYOC AVE SW ORTING, WASHINGTON</p>	
<p>DRAWN BY: CH</p>	<p>PROJ. NO: 2019-041C</p>	
<p>DATE: APRIL 2020</p>	<p>APPROX SCALE: SEE ABOVE</p>	
<p>PRJ MGR: LS</p>		

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Enclosure B

Data Tables

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Table 1: Soil Sample Analytical Results

Sample Identification	Sample Date	Sample Depth (ft bgs)	PID (vppm)	Gasoline-Range TPH	Diesel-Range TPH	Heavy Oil-Range TPH	Benzene	Toluene	Ethylbenzene	Xylenes	Naphthalene	PCE	Other VOCs	cPAHs	Arsenic	Cadmium	Chromium	Lead	Mercury
SP1-7-8	1/8/2020	7-8	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP1-11.5-12	1/8/2020	11.5-12	0.0	ND (<20)	ND (<50)	ND (<250)	ND (<0.03)	ND (<0.05)	ND (<0.05)	ND (<0.15)	ND (<0.05)	ND (<0.025)	ND	ND	1.72	ND (<1)	10.2	2.27	ND (<1)
SP1-15-16	1/8/2020	15-16	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP2-3.5-4	1/8/2020	3.5-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP2-7-8	1/8/2020	7-8	0.0	ND (<20)	ND (<50)	ND (<250)	ND (<0.03)	ND (0.05)	ND (<0.05)	ND (<0.15)	ND (<0.05)	ND (<0.025)	ND	---	---	---	---	---	---
SP2-11-12	1/8/2020	11-12	0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP3-3-4	1/8/2020	3-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP3-7-8	1/8/2020	7-8	0.0	ND (<20)	ND (<50)	ND (<250)	ND (<0.03)	ND (<0.05)	ND (<0.05)	ND (<0.15)	ND (<0.05)	ND (<0.025)	ND	---	---	---	---	---	---
SP3-11-12	1/8/2020	11-12	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP4-3-4	1/8/2020	3-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP4-11-12	1/8/2020	11-12	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP4-15-16	1/8/2020	15-16	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP4-7-8	1/8/2020	7-8	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP5-3-4	1/8/2020	3-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP5-6-7	1/8/2020	6-7	5.2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP5-7-8	1/8/2020	7-8	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP5-11-11.5	1/8/2020	11-11.5	51.0	50	ND (<50)	ND (<250)	ND (<0.03)	ND (<0.05)	ND (<0.05)	ND (<0.15)	ND (<0.05)	ND (<0.025)	ND	---	---	---	---	---	---
SP5-13-14	1/8/2020	13-14	8.7	50	---	---	ND (<0.02)	ND (<0.02)	0.027	ND (<0.06)	---	---	---	---	---	---	---	---	---
SP5-15-16	1/8/2020	15-16	144.4	330	210	ND (<250)	ND (<0.03)	ND (<0.05)	ND (<0.05)	ND (<0.15)	ND (<0.05)	ND (<0.025)	sec-Butylbenzene = 0.28 p-Isopropyltoluene = 0.081 n-Propylbenzene = 0.11	ND	1.52	ND (<1)	9.70	2.60	ND (<1)
SP5-18-19	1/8/2020	18-19	1.4	ND (<5)	---	---	ND (<0.02)	ND (<0.02)	ND (<0.02)	ND (0.06)	---	---	---	---	---	---	---	---	---
SP5-19-20	1/8/2020	19-20	0.1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP6-3-4	1/8/2020	3-4	0.1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP6-7-8	1/8/2020	7-8	0.1	ND (<20)	ND (<50)	ND (<250)	ND (<0.03)	ND (<0.05)	ND (<0.05)	ND (<0.15)	ND (<0.05)	ND (<0.025)	ND	---	---	---	---	---	---
SP6-15-16	1/8/2020	15-16	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP7-3-4	3/18/2020	3-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP7-7-8	3/18/2020	7-8	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP7-11-12	3/18/2020	11-12	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP7-15-16	3/18/2020	15-16	0.0	ND (<20)	ND (<50)	ND (<250)	ND (<0.02)	ND (<0.02)	ND (<0.02)	ND (<0.06)	---	---	---	---	---	---	---	---	---
SP7-19-20	3/18/2020	19-20	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP8-3-4	3/18/2020	3-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP8-7-8	3/18/2020	7-8	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP8-11-12	3/18/2020	11-12	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP8-15-16	3/18/2020	15-16	0.0	ND (<20)	ND (<50)	ND (<250)	ND (<0.02)	ND (<0.02)	ND (<0.02)	ND (<0.06)	---	---	---	---	---	---	---	---	---
SP8-19-20	3/18/2020	19-20	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP9-3-4	3/18/2020	3-4	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP9-7-8	3/18/2020	7-8	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP9-11-12	3/18/2020	11-12	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
SP9-15-16	3/18/2020	15-16	0.0	ND (<20)	ND (<50)	ND (<250)	ND (<0.02)	ND (<0.02)	ND (<0.02)	ND (<0.06)	---	---	---	---	---	---	---	---	---
SP9-19-20	3/18/2020	19-20	0.0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Method A Cleanup				30/100 ¹	2,000	2,000	0.03	7	6	9	5	0.05	varies	varies	20	2	19/2,000 ²	250	2

Notes:

All results reported in milligrams per kilogram (mg/kg)

Results above MTCA Method A Cleanup Levels, if any, in bold.

ft bgs = feet below ground surface.

vppm = volumetric parts per million

PID = Photoionization Detector

TPH = Total Petroleum Hydrocarbons

VOCs = Volatile Organic Compounds (only detected compounds are listed in the table)

cPAHs = Carcinogenic Polynuclear Aromatic Hydrocarbons (only detected compounds are listed in the table)

MTCA = Model Toxics Control Act

--- = Not Analyzed

¹The higher cleanup level applies if no benzene is present in the soil sample and the sum of toluene, ethylbenzene and xylenes is less than 1% of the gasoline mixture

²The higher cleanup level applies to Chromium III, the lower cleanup level applies to Chromium VI

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Table 2: Groundwater Grab Sample Analytical Results

Sample Location	Sample Date	Gasoline-range TPH	Diesel-range TPH	Motor Oil-Range TPH	Benzene	Toluene	Ethylbenzene	Xylenes	Naphthalene	PCE	Other VOCs	Dissolved Arsenic	Dissolved Cadmium	Dissolved Chromium	Dissolved Lead	Dissolved Mercury
SP1-GW	1/8/2020	ND (<200)	ND (<500)	ND (<500)	ND (<0.35)	ND (<1)	ND (<1)	ND (<3)	ND (<1)	2.1	ND	---	---	---	---	---
SP2-GW	1/8/2020	ND (<200)	ND (<500)	ND (<500)	ND (<0.35)	ND (<1)	ND (<1)	ND (<3)	ND (<1)	ND (<1)	ND	---	---	---	---	---
SP3-GW	1/8/2020	ND (<200)	ND (<500)	ND (<500)	ND (<0.35)	ND (<1)	ND (<1)	ND (<3)	ND (<1)	1.1	ND	ND (<1)	ND (<1)	2.29	7.08	ND (<1)
SP5-GW	1/8/2020	ND (<100)	340	ND (<250)	ND (<0.35)	ND (<1)	ND (<1)	ND (<3)	ND (<1)	ND (<1)	ND	ND (<1) ^f	ND (<1) ^f	ND (<1) ^f	ND (<1) ^f	ND (<1) ^f
SP6-GW	1/8/2020	ND (<200)	ND (<500)	ND (<500)	ND (<0.35)	ND (<1)	ND (<1)	ND (<3)	ND (<1)	ND (<1)	ND	---	---	---	---	---
SP7-GW	3/18/2020	ND (<100)	ND (<50)	ND (<250)	ND (<1)	ND (<1)	ND (<1)	ND (<3)	---	---	---	---	---	---	---	---
SP8-GW	3/18/2020	ND (<100)	ND (<50)	ND (<250)	ND (<1)	ND (<1)	ND (<1)	ND (<3)	---	---	---	---	---	---	---	---
SP9-GW	3/18/2020	ND (<100)	77 ^x	ND (<250)	ND (<1)	ND (<1)	ND (<1)	ND (<3)	---	---	---	---	---	---	---	---
MTCA Method A Groundwater Cleanup		800/1,000 ¹	500	500	5	1,000	700	1,000	160	5	varies	5	5	50	15	2

Notes:

All results reported in micrograms per liter (µg/L)

Results above MTCA Method A Cleanup Levels, if any, in bold.

TPH = Total Petroleum Hydrocarbons

VOCs = Volatile Organic Compounds

PCE = Tetrachloroethene

TCE = Trichloroethene

^f = The sample was laboratory filtered prior to analysis.

^x = The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

¹The higher cleanup level applies if no benzene is present in the groundwater sample.

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Table 3: Sub-Slab Vapor Sample Analytical Results-
 Contaminants of Concern

Sample Identification	Sample Date	Benzene	Toluene	Ethylbenzene	Xylenes	Trichloroethene	Tetrachloroethene	Other HVOCs
SSV-1	1/8/2020	ND (<2.4)	ND (<140)	250	6.7	ND <2)	310	ND (varies)
Default MTCA Method B Sub-Slab Screening Levels		11	76,200	15,000	1,500	11.0	320	varies

Notes:

All results reported in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)
 Results above MTCA Method B Screening Levels, if any, in bold.
 HVOCs = Halogenated Volatile Organic Compounds
 MTCA = Model Toxics Control Act

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**Table 4: Site-Specific Total TPH
 Concentration in Vapor**

Petroleum Fraction or Compound	Measured Conc. Site-Specific Sub-Slab Sample ($\mu\text{g}/\text{m}^3$)	Fraction of Total Concentration (F_i)	Indoor Air Total TPH Non-Carcinogenic CUL_i ($\mu\text{g}/\text{m}^3$)	Sub-Slab Attenuation Factor (AF)	Sub-Slab Total TPH Non-Carcinogenic CUL_{ss} ($\mu\text{g}/\text{m}^3$)	F_i/CUL_{ss}
Aliphatics EC>5-8	640	0.475235761	2.70E+03	0.0300	9.00E+04	5.28E-06
Aliphatics EC>9-12	450	0.334150145	1.40E+02	0.0300	4.67E+03	7.16E-05
Aromatics EC>9-10	0	0	1.80E+02	0.0300	6.00E+03	0.00E+00
Benzene	0	0	1.37E+01	0.0300	4.57E+02	0.00E+00
Toluene	0	0	2.29E+03	0.0300	7.62E+04	0.00E+00
Ethylbenzene	250	0.185638969	4.57E+02	0.0300	1.52E+04	1.22E-05
Xylenes	6.7	0.004975124	4.57E+01	0.0300	1.52E+03	3.26E-06
Naphthalene	0	0	1.37E+00	0.0300	4.57E+01	0.00E+00
Total TPH Concentration:	1,346.70					
						10,830.54

Site-Specific
 Sub-Slab Total TPH
 Non-Carcinogenic
 Screening Level
 ($\mu\text{g}/\text{m}^3$)

Note: Values detected below the PQL are entered as "0"

Notes:

All results reported in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)

EC = location on hydrocarbon chain

TPH = Total Petroleum Hydrocarbons

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Enclosure C

Basis for the Opinion: List of Documents

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Basis for the Opinion: List of Documents

1. Columbia Environmental, Inc., *Independent Remedial Action Bus Garage and Adjacent Residence*, December 29, 1996.
2. Atlas Geosciences NW (Atlas), *Phase I Environmental Site Assessment*, September 9, 2019.
3. Atlas, *Focused Phase II Subsurface Investigation*, March 2, 2020.
4. Atlas, *Supplemental Phase II Subsurface Investigation*, April 12, 2020.
5. Atlas, *Terrestrial Ecological Evaluation Form*, June 15, 2020.
6. Ecology, *Further Action at the Following Site: Former Orting School District Bus Garage*, Letter, November 12, 2020.
7. Atlas, *Response to Further Action Letter*, May 16, 2021.