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DEPARTMENT OF ECOLOGY
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December 27, 2021

Mathew Bean
Managing Partner
Lift Real Estate Partners Fund, LLC
180 Sutter Street, Ste 400
San Francisco, CA 94104
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Re: Opinion on Proposed Cleanup of the following Site:

- **Site Name:** Coatings Unlimited Inc Kent
- **Site Address:** 18420 68th Avenue South, Kent, WA 98032
- **Facility/Site No.:** 18965792
- **Cleanup Site No.:** 5652
- **VCP Project No.:** XN0006

Dear Mathew Bean:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Cleaners 1 site (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

Upon completion of the proposed cleanup, will further remedial action likely be necessary to clean up contamination at the Site?

NO. Ecology has determined that, upon completion of your proposed cleanup, no further remedial action will likely be necessary to clean up contamination at the Site[1].

[1] Note that achieving cleanup levels via the proposed remedial technologies and methods carries uncertainties. Determination of no further action by Ecology will be contingent on sampling results confirming that MTCA cleanup levels have been achieved at approved points of compliance.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided as follows.

Summary of Opinion

Under MTCA, a site is defined by the extent of contamination. For the Coatings Unlimited Inc Kent site, the extent of contamination is primarily within the property located at 18420 68th Avenue South in Kent (King County Parcel Number 640760-0050) hereinafter referred to as "the Property."

The contamination at the Site includes the chlorinated solvents tetrachloroethene (PCE) and trichloroethene (TCE), and their degradation daughter products cis-1,2-dichloroethen (c12DCE) and vinyl chloride (VC). The greatest extent of contamination is for VC in groundwater, and concentrations of VC have been found above MTCA Method A cleanup levels in groundwater beneath the Property as well as the adjacent properties to the north and south. Hence the Site is generally defined by the extent of VC in groundwater.

The adjacent property to the south is referred to as the West Valley Business Park site (CSID 1006) which in Ecology's ISIS database consists of petroleum in soil and groundwater.

Ecology has received supplemental information in response to our further action letter dated August 20, 2021, and an email request dated November 3, 2021. **Ecology has determined that the supplemental information provided within a revised remedial investigation (RI)/ feasibility study (FS) dated October 28, 2021, and supplemental information emailed to Ecology on December 2, 2021 sufficiently addresses Ecology's questions with respect to the remedial approach proposed for the Site.**

The Property consists of 6.55 acres of land which held an industrial operation known as Coatings Unlimited from about 1998 to 2018, and then International Coatings Unlimited after 2018, as well as several other tenant business on the Property. The Property is being redeveloped as a warehouse facility.

The historical operations at the Property resulted in contamination releases to soil, groundwater, & potentially, air. Investigations and remedial actions have taken place at the Property since 1987. A map showing areas of previous Interim Remedial Actions is provided as attached Figure 7.

Based on the remedial investigation report, Site contaminants in groundwater include arsenic, vinyl chloride (VC) and *cis*-1,2-dichloroethene (c12DCE), both of which are degradation products of Tetrachloroethene (PCE) or Trichloroethene (TCE). Site contaminants found in soil include TCE, heavy oils, carcinogenic polycyclic aromatic hydrocarbons (CPAHs), and lead.

Proposed Cleanup Alternative

A preferred cleanup alternative for the Site was presented within the October 2021 RI/FS report and further discussed during correspondences with Ecology. The preferred cleanup alternative includes the following components:

- Excavation and offsite disposal for soils contaminated with heavy oils, CPAHs, or lead above MTCA Method A cleanup levels. These areas appear to be relatively discrete (primarily at locations B5 and B4, see attached Figures 11 and 17b). Ecology suggests that these excavations proceed as an Interim Remedial Action.
- Air sparge and soil vapor extraction (AS/SVE) for source areas of chlorinated volatiles organic compounds (CVOCs), including PCE, TCE, c12DCE, and VC in soil, soil gas, and groundwater.
- Natural attenuation of VC in groundwater at concentrations above MTCA cleanup levels in areas outside of the remediated source areas.
- Potential use of conditional points of compliance (CPOCs) on the downgradient property boundary and potentially, use of remediation levels (RELs) for cleanup of source areas.
- The recording of an Environmental Covenant (EC), signed by Ecology to provide for protection of human health and the environment from any remaining contamination above MTCA cleanup levels.

Ecology concurs with the above cleanup approach, with the following caveats/clarifications.

- The soil excavations should include sufficient confirmation sampling to ensure that all of the soil contamination in these areas has been removed. Disposal receipts should be submitted to Ecology to document proper disposal. Ecology suggests that these excavations proceed as Interim Remedial Actions. Each Interim Remedial Action should be summarized on a report and submitted to Ecology for review and comment.
- A Cleanup Action Plan (CAP) will be needed providing details on the conceptual design of the proposed AS/SVE systems and refining proposed CPOCs and RELs, this information should also be provided to Ecology for review and comment.
- A total of five (5) source areas are proposed for AS/SVE treatment at the Site (see attached Figures 20 and 22). Additional Site characterization had been requested by Ecology to confirm source areas requiring treatment at the Site (a list of data gaps was provided by Ecology in an email dated December 3, 2021, and a table listing data gaps is provided in Enclosure A). These data gaps include the need for temporary and/or permanent monitoring wells at selected confirmed or potential source areas, and in areas downgradient of elevated CVOC concentrations where no downgradient monitoring well is currently present. Locations of current monitoring wells are shown on attached Figure 3.

Once the requested additional data has been collected, Ecology can assess whether or not additional source controls are needed beyond the five (5) source areas currently proposed for remediation. Many of the monitoring wells requested by Ecology also have potential to serve as compliance/performance monitoring points in the future, hence they are not solely needed for characterization purposes.

- The acceptability of the currently proposed remedial approach requires that no contaminated groundwater is leaving the Property. Currently, available data suggests that no groundwater contamination above MTCA cleanup levels is currently leaving the Property; however, this conclusion needs confirmation at several locations (see Ecology's December 3, 2021 email). If groundwater contamination is found to be leaving the Property after installation and sampling of the requested monitoring points, then Ecology will reassess the proposed cleanup approach and this NFA Likely determination.
- A disproportionate cost analysis (DCA) will be needed prior to Ecology's approval of the use of CPOCs, and Ecology must concur with that DCA. Otherwise, the presumption under MTCA is that all contaminated groundwater will be cleaned up to below MTCA cleanup levels.
- Ecology also notes that the proper design of an AS/SVE system may indicate the need for additional data that could be collected during design data acquisition activities. Such data needs should be discussed within the CAP. This potentially could include additional data to support appropriate spacing of AS and SVE wells (radius of influence analyses).

Description of the Site

This opinion applies to the Site described as follows. The Site is defined by the nature and extent of contamination associated with the following releases:

- Suspected PCE, and confirmed TCE, petroleum (heavy range oil), CPAHs, and lead, into the soil.
- Suspected PCE and TCE and confirmed c12DCE and VC into groundwater.
- Suspected PCE, TCE, c12DCE, and VC into air.

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. The adjacent property to the south of the Site is the West Valley Business Park site (CSID 1006). Contamination releases of Site CVOCs appear to have taken place close to the southern boundary of the Property, and exceedances of MTCA cleanup levels have occurred on both sides of the property boundary (see attached Figure 8b). As previously mentioned, Ecology's ISIS database lists the contaminants at the West Valley Business Park site as petroleum in soil and groundwater. The

CVOCs in groundwater beneath the West Valley Business Park appear to be of limited extent and may be attributable to the releases on Coatings Unlimited property.

The Site is located within an area of King County impacted by the Tacoma Smelter site (CSID 3657), mapped as under 20 ppm arsenic in soil. No soil samples from the Site had arsenic concentrations in excess of the Method A cleanup level of 20 mg/kg; therefore, no further actions regarding impacts from the Tacoma Smelter site appear to be warranted.

At this time, Ecology has no information suggesting that the parcels associated with this Site may be affected by sites other than those listed above.

Basis for the Opinion

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

1. Farallon Consulting. *Remedial Investigation and Feasibility Study Report, 18420 68th Avenue South*. June 29, 2021
2. Ecology. *Further Action at the following site: Coatings Unlimited Inc Kent,*. August 20, 2021.
3. Farallon Consulting. *Revised Remedial Investigation and Feasibility Study Report, 18420 68th Avenue South*. Revised October 28, 2021.
4. Ecology. *Email RE: Expedited VCP XN0006 Coatings Unlimited - Remedial Investigation / Feasibility Study. Revised RI/FS Comments*. November 3, 2021.
5. Farallon Consulting. *Email RE: Expedited VCP XN0006 Coatings Unlimited - Remedial Investigation / Feasibility Study*. December 2, 2021.
6. Ecology. *Email RE: Expedited VCP XN0006 Coatings Unlimited - Remedial Investigation / Feasibility Study. Data Gaps*. December 3, 2021

A number of these documents are accessible in electronic form from the Site webpage https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=5652. The complete records are stored in the Central Files of the Headquarters Office of Ecology, for review by appointment only. Visit our Public Records Request page https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests, 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 of the Proposed Cleanup

Ecology has concluded that, upon completion of your proposed cleanup, **no further remedial action** will likely be 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 (with the above caveats and clarifications). The Site is described above and in **Enclosure A.** As discussed above, additional data will be needed for the preparation of a Cleanup Action Plan; however, the currently available data, pending confirmation information discussed above, are sufficient to identify the appropriate cleanup approach at the Site.

   Site Soil Contamination

   A total of 73 soil samples were collected at 51 locations between 1990 and 2008. Exceedance of MTCA Method A cleanup levels occurred only within the following four soil samples:

Contaminant	Concentration in Soil (mg/kg)	Location and Depth (feet)	MTCA Method A Cleanup level
TCE	0.091	B9-12’	0.03
Heavy Oil	5,000	B5-5’	2,000
CPAHS	0.303	B4-1’	0.1
Lead	460	B4-1’	250

Site Groundwater Contamination

VC and c12DCE in Groundwater

A total of 166 groundwater samples were collected from 67 locations and analyzed for CVOCs between 1996 and 2021. Detections of VC and c12DCE in groundwater above MTCA cleanup levels are summarized in the following table:

Contaminant	Maximum Concentration (µg/L)	Potential Cleanup Level (µg/L)	Number of Exceedances/Samples
Vinyl chloride (VC)	670***	0.2**	65/115
cis-1,2-dichloroethene (c12DCE)	90	16*	18/115

* Method A cleanup level

** Method B, direct contact cleanup level

*** The 670 µg/L results was anomalous within a resampled monitoring well; the next highest value was 260 µg/L.

The extent of VC and c12DCE in groundwater has not been completely characterized. Data gaps identified by Ecology are discussed above and listed in a table provided in Enclosure A. These data gaps include the need for additional source area characterization and additional characterization to confirm the upgradient and downgradient extent of contamination.

Existing data suggest that groundwater contamination above MTCA cleanup levels may currently be limited to the Property; however, confirmation of that conclusion is needed at both the northern and southern property boundaries.

Arsenic in Groundwater

A total of 66 groundwater samples were collected from 28 locations and analyzed for arsenic between 2019 and 2021. Most samples were analyzed for both total and dissolved arsenic (ten were analyzed for total arsenic only). A total of 11 samples from three (3) locations had dissolved arsenic concentrations in excess of the regional background concentration of 8.0 µg/L. All but one (1) of the ten (10) samples analyzed for total arsenic only exceeded the regional background concentration of 8.0 µg/L.

The maximum total arsenic concentration was 710 µg/L at location B-11 and the maximum dissolved arsenic concentration was 49 µg/L at location FMW-3. Further investigation of location B-11 was requested by Ecology in our December 3, 2021 email (see data gaps table in Enclosure A).

Additional information was provided within the revised RI/FS report regarding the occurrence of wood materials in the subsurface within the area. Wood materials in the subsurface can result in reducing (negative oxidation-reduction potential [ORP]) conditions that can mobilize naturally occurring arsenic. Ecology notes that it can be challenging to differentiate between naturally and anthropogenically deposited wood. However, wood is not the only material that can consume oxygen in the subsurface and result in reducing conditions. Heavy oil was detected at 220 µg/L (below the Method A cleanup level) in groundwater samples from FMW-3, where arsenic was most recently found at 34 µg/L. The report also indicated on pages 2-5 and 4-13 that there was wood debris found in FMW-3 and FMW-4. However, no wood debris was found in the boring logs from these locations.

Notwithstanding the above concerns, Ecology has concluded that the arsenic in groundwater above the regional background concentration (8 µg/L) may be from a combination of natural and anthropogenic causes. Arsenic mobilized due to contaminant releases (such as from heavy oil in groundwater) would be expected to attenuate after the causal contaminant is cleaned up or attenuated. In addition, the proposed air sparging groundwater treatment will locally make groundwater conditions aerobic, which should theoretically reduce arsenic concentrations in groundwater.

Hence, Ecology concludes that the cleanup of contamination at the Site should first focus on contaminants of concern other than arsenic. Long-term monitoring of arsenic in groundwater would be appropriate to observe if concentrations attenuate. If concentrations do not attenuate after other anthropogenic releases have been cleaned up and/or attenuated, then the arsenic may be concluded by Ecology to be of natural origin. Such long-term monitoring should be detailed within a Cleanup Action Plan.

PCE, TCE, and VC in Sub-Slab Soil Gas

A total of 18 soil gas samples were collected from 18 locations. No indoor air samples have reportedly been collected.

Detections of VC and c12DCE in sub-slab soil gas samples above the unrestricted land use based screening level are summarized in the following table:

Contaminant	Maximum Concentration (µg/L) (Location of Maximum)	Unrestricted Land Use Based Screening Level (µg/L)	Number of Exceedances/Samples
Tetrachloroethene (PCE)	79,000 (F-11)	320	1/17
Trichloroethene (TCE)	5,400 (F-1)	11	8/18
Vinyl chloride (VC)	12 (F-14)	9.5	1/16

Of the 18 soil gas sampling locations, seven (7) were collected within existing structure footprint, and three (3) were collected immediately adjacent to existing structures. Of those, six (6) exceeded the sub-slab soil gas screening level for TCE. Locations with sub-slab soil gas screening level exceedances near or beneath structures present a risk to indoor air quality.

Based on the number of exceedances of the sub-slab soil gas screening levels, TCE appears to present the greatest risk to indoor air at the Site. The screening level exceedances at F-1 and F-11 were the highest; the next highest TCE concentration was 120 µg/m^3 at location F-12.

2. **Establishment of cleanup standards and points of compliance**.

Ecology has determined the cleanup levels and points of compliance presented below meet the substantive requirements of MTCA.

Cleanup Standards for Soil and Groundwater

The following cleanup levels have been selected for the Site for soil and groundwater:

Contaminant	**Method A Cleanup level for soil (mg/kg)**	**Method A Cleanup level for groundwater (µg/L)**
Gasoline range organics	100/30*	1,000/800*
Diesel range organics	2,000	500
Heavy oil range organics	2,000	500
Benzene	0.03	5
Toluene	7	1,000
Ethylbenzene	6	700
Xylenes	9	1,000
Tetrachloroethene (PCE)	0.05	5
Trichloroethene (TCE)	0.03	5
cis-1,2-dichloroethene (c12DCE)	160**	16**
Vinyl chloride (VC)	0.67**	2
Arsenic (As)	20	5***
Lead (Pb)	250	15
Chromium-3 (Cr^{+3})	2,000	50***
Chromium-6 (Cr^{+6})	19	--
CPAHs	0.1	0.1

*Higher cleanup level applies if no benzene is present.

**Method B cleanup level – no Method A value established.

***The regional background concentration for As is 8 µg/L.

****Value for total chromium value.

Ecology notes that the above soil cleanup levels for c12DCE and VC are based on the direct contact pathway. Method B soil-protective-of groundwater cleanup levels will apply to soil, unless an empirical demonstration of a lack of impact to groundwater from the soil can be made after groundwater cleanup is complete.

Surface water cleanup levels will apply to groundwater where the groundwater-to-surface water pathway is potentially active. Generally, the downgradient monitoring wells in closest proximity to surface water would be considered for surface water compliance.

A standard point of compliance (throughout the Site) is anticipated to be applied for soil. For the direct contact soil pathway, this is from the ground surface to fifteen feet below the ground surface.

The potential use of conditional points of compliance (CPOCs) for groundwater are under examination by Ecology; however, as discussed above, additional information is needed to assess whether or CPOCs can be applied at the Site.

Cleanup Standards for Soil Gas and Indoor Air

Sub-slab soil gas screening levels and indoor air cleanup levels are summarized in the following table:

Contaminant	**Sub-Slab Soil Gas Screening Levels (µg/m^3)**	**Indoor Air Cleanup Levels (µg/m^3)**
Tetrachloroethene (PCE)	320*	9.62*
Trichloroethene (TCE)	11*	0.33**
cis-1,2-dichloroethene (c12DCE)	NS	NS
Vinyl chloride (VC)	9.5*	0.28*

*Unrestricted land use, cancer.

**Early life based cleanup level for TCE, see Ecology's Implementation Memo No 22: https://apps.ecology.wa.gov/publications/SummaryPages/1809047.html

NS = no cleanup level list in Ecology's CLARC table.

Ecology notes that the RI/FS included both unrestricted and commercial land use-based sub-slab soil gas screening levels and indoor air cleanup levels. Ecology will first compare actual site data with unrestricted land use based values. Comparison with commercial and/or industrial land use-based values would require first submittal to Ecology of zoning information limiting land uses at the Site.

Potential Ecological Receptors

The Site is located in a relatively dense urban setting. Approximately 1.4 acres of open space are located with 500 feet of the site (the banks of the Green River). However, based on completion of MTCA Table 749-1, the Site is exempt from further Terrestrial Ecological Evaluation.

3. **Selection of cleanup action.**

Ecology has determined the cleanup action you proposed for the Site meets the substantive requirements of MTCA, provided the selected cleanup levels are achieved at approved points of compliance.

Historical Cleanup Activities

Some cleanup has been previously done at the Site, as part of Interim Remedial Actions (see attached Figure 7 for areas). These Interim Remedial Actions are summarized as follows:

Area	Years	Remedial Actions
Former UST Area (North Central Coatings Unlimited Property)	1987, 1991	UST Decommissioning, Soil Excavation
Sandblasting Area (East Central Coatings Unlimited Property)	1991	Soil Excavation
Compressor Area (North Central Area, West Valley Business Park)	1998	Soil Excavation
Sump Discharge Area (North Central Area, West Valley Business Park)	1998	Soil Excavation
South Central CVOC Area, Coatings Unlimited Property	2003-2006	Air sparging/soil vapor extraction

<u>West Valley Business Park Interim Remedial Actions</u>

A partial sufficiency letter was issued by Ecology in 1999 for the West Valley Business Park site. The partial sufficiency letter stated “Ecology has determined that, at this time, the release of the petroleum hydrocarbons into soil no longer poses a threat to human health or the environment.”

The partial sufficiency letter also indicated that further action would be needed to address the C12DCE detected in groundwater above the Method B cleanup level in this area. The letter did not comment on the sufficiency of cleanup of petroleum in groundwater (both diesel range organics (DRO) and heavy oil range organics (ORO) were detected in groundwater at concentrations above Method A cleanup levels in 1997). The petroleum contamination in this area is considered by Ecology to be part of the West Valley Business Park Site (CSID 1006) and not part of the Coatings Unlimited Inc Kent Site (CSID 5652).

Ecology notes that petroleum in soil was also found above cleanup levels on the Coating Unlimited property at location B5, at a depth of five (5) feet below ground surface (ft bgs) (see attached Figure 11). That contamination is part of the Coatings Unlimited Inc Kent Site (CSID 5652). The extent of that petroleum in soil in this area should be defined during the proposed excavation and offsite disposal.

Sand Blasting Area

Soil excavation cleanup work conducted in the sandblasting area in 1991 resulted in removal of soils contaminated with metals such as lead. However, additional soil contamination in this area remained. Additional excavation cleanup in this area is proposed within the RI/FS report as further discussed below.

North Central UST Area

Cleanup work in the north central UST area took place in 1987 and in 1991. During the UST removals in 1987, a single soil sample was collected and analyzed for oil and grease, which were reported non-detect (less than 20 mg/kg). The location or depth of the soil sample was not provided.

In 1991, excavation at the UST area was extended to 11 ft bgs. Approximately 54 cubic yards of soil was excavated and placed into two stockpiles and contaminated soil later disposed of offsite at a waste disposal facility. Two confirmation soil samples were collected from the bottom of the excavation (see locations 5B and 6B on attached Figure 3). The samples were analyzed for DRO and ORO. Following the excavation work, no DRO or HRO was found in soil at concentrations above cleanup levels. In addition, no DRO or HRO was ever detected in groundwater samples collected in this area at concentrations above Method A cleanup levels. The cleanup of the petroleum in soil contamination in this area appears to be complete.

South Central CVOC Area

Air sparging (AS) and soil vapor extraction (SVE) treatment within the South Central CVOC area took place between June 2004 and December 2006 to address C12DCE and VC in groundwater near the southern property boundary of the Coatings Unlimited property. The general area is shown on Figure 7, attached. Monitoring wells MW-1 through MW-3 were installed and sampled in this area between 2004 to 2008 (see Figure 8b). Concentrations of CVOCs reportedly declined between 2004 and 2006 but showed some rebound after the system was shut off in December 2006.

Sampling of these monitoring wells was also conducted in 2019-2021 (see Figure 9). Although CVOC concentrations showed a significant reduction between 2004 and 2021, some cleanup level exceedances in the 2019 to 2021 period still occurred. Therefore, sufficiency of cleanup of CVOCs in groundwater in this area had not yet been demonstrated. In addition, no source of the CVOCs in vadose zone soils was apparently discovered in this area, therefore, the possibility of remaining CVOCs in soil at concentrations above cleanup levels cannot be precluded. Further characterization of both soil and groundwater is needed to determine if cleanup efforts in this area were sufficient.

Proposed Additional Cleanup Activities

The RI/FS report proposed further excavation and offsite disposal at locations B5 and B4, where soil cleanup level exceedances occurred for heavy oil and metals, respectively (see attached Figures 11 and 17b). Ecology suggests that these excavations proceed as an Interim Remedial Action. Ecology requests that the confirmation sampling of soils within the sandblasting area include both RCRA eight (8) metals and hexavalent chromium analysis.

Cleanup of VC and c12DCE in groundwater via air sparging and soil vapor extraction (AS/SVE) is proposed within the RI/FS report at five source areas (see Figures 20 and 22). Ecology considers AS/SVE to be an appropriate technology for cleanup of VC and cis12DCE groundwater contamination in source areas. As discussed above, some additional data is needed prior to confirming whether any source areas in addition to the five proposed for AS/SVE will needed source controls (i.e. potentially additional areas for AS/SVE treatment).

In addition, the potential for application of CPOCs for assessment of compliance after completion of remediation is currently uncertain. Confirmation that the contamination in groundwater at concentrations above cleanup levels is not currently migrating onto neighboring properties is needed prior to approval of the use of CPOCs.

The vapor intrusion pathway is proposed to be addressed through the installation of a chemical-resistant vapor barrier to be installed as part of the foundation of a planned future building on the Site. The vapor barrier approach appears to be acceptable with the following exceptions:

- Locations F-1 and F-11 had very high soil gas concentrations for TCE, and for PCE and TCE, respectively. In areas with higher soil gas concentration (e.g. greater than 1,000 $\mu g/m^3$), more active remediation appears to be warranted to provide for a higher confidence in preventing vapor intrusion.

- Based on the passive soil gas sampling data provided in the RI/FS report, there may be areas of high TCE in soil gas that have not yet been sampled. These include the northwest portion of the current structure (location B4) , the north central portions of the current structure (location E3), southeast of the current structure (location I8), and the northeast part of the property (M3). Verification of a lack of elevated soil gas concentrations at these locations is warranted, especially in areas in the vicinity of current or future structures.
- The construction of a vapor barrier system should be documented to ensure no damage during installation, and smoke testing is typically performed to verify that seams are airtight.
- Indoor air sampling is anticipated to be needed to confirm the protectiveness of a vapor barrier system. Such indoor air sampling should be conducted when risk of vapor intrusion is highest (when there is a pressure gradient between sub-slab soil gas and indoor air). Also, since vapor intrusion is a highly temporally variable phenomena, one sampling round will likely not be sufficient to demonstrate a lack of risk. Please refer to Ecology's vapor intrusion guidance documents for more information. (https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview).
- If any contamination is to remain above MTCA cleanup levels, it is anticipated that an Environmental Covenant (EC) will be necessary and should be included within the cleanup plan. Elements of an EC could potentially include (but not be limited to) the following provisions:
    - A prohibition on installation of water supply wells on the Site.
    - A monitoring plan for continued groundwater monitoring.
    - Continued indoor air monitoring requirements.
    - Vapor barrier protection and monitoring 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 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 proposed will be substantially equivalent. Courts make that determination. *See* RCW 70A.305.080 and WAC 173-340-545.

3. **Opinion is limited to proposed cleanup.**

   This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the Voluntary Cleanup Program (VCP).

4. **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).

Contact Information

Thank you for choosing to clean up the Site under the VCP. As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our webpage [2]. If you have any questions about this opinion, please contact me by phone at (509) 454-7835 or e-mail at frank.winslow@ecy.wa.gov.

Sincerely,

Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarter Section

Enclosure: A – Site Description and Diagrams

cc: Pete Kingston, Farallon

[2] https://www.ecy.wa.gov/vcp

Enclosure A

Site Description and Diagrams

Site Description

Site: The Site is defined by the extent of contamination in soil, groundwater, and potentially air. Current data indicate that contamination is primarily located on the Coatings Unlimited Property, located at 18420 68th Avenue South in Kent, Washington. The contamination is from releases associated with industrial activities on this property. Some contamination may be present on adjacent parcels to the north and south.

The Coating Unlimited Property has had many tenants, including Industrial Coatings Unlimited (ICU), which operated as "Coatings Unlimited" prior to 2018. The RI/FS lists eight tenants of potential interest on the Coatings Unlimited Property:

- Industrial Coatings Unlimited (ICU), operating as "Coatings Unlimited" prior to 2018: The majority of the Property is occupied by ICU. ICU has occupied the Property for over 20 years. ICU services the commercial, industrial, and marine markets. Operations include sandblasting, painting, and applying industrial coatings for corrosion control. ICU occupies a portion of Building 1 and portions of Buildings 3 through 5. ICU also occupies and/or uses the majority of the covered storage areas, storage buildings, and portable storage containers on the southern portion of the Property, and the portable trailers east of the Building 4. Materials are stored by ICU throughout exterior portions of the Property, with the majority stored in the Storage Yard.

- Northwest Prefab: This tenant has occupied the Property since 2013. Northwest Prefab assembles wood panels for off-Property construction, occupies part of the western portion of Building 3, and stores wood on the eastern portion of the Storage Yard and on the southwestern portion of the Property.

- Safe Systems: This tenant has occupied the Property for over 20 years. Safe Systems builds and fabricates sandblast equipment, and occupies portions of Building 1 and Building 3. Operations include welding, grinding, and milling. Lathes are used to smooth and shape various materials.

- Natural Stoneworks: This tenant has occupied the Property for over 5 years and occupies the northwestern portion of Building 3. Natural Stoneworks operations include cutting and grinding stone slabs for installation at commercial and residential properties.

- Protect Construction Services: This tenant has occupied the Property for over 5 years. Protect Construction Services conducts operations in Building 5 involving warehousing and storage of plastic wrapping, and uses a portion of Building 1 for office and retail sales purposes.

- Phampena, Inc.: This tenant has occupied the Property for approximately 1 year. Phampena, Inc. operates as a general contractor and scaffolding rental company, and occupies Building 2 for storage of construction-related materials, tools, and equipment for off-Property use; and uses the southeastern portion of the Storage Yard for scaffolding storage.

- CAM Industries, Inc. (CAM): This tenant has occupied the Property for over 20 years. CAM assembles heaters for resale, and occupies a small area in the western portion of Building 3, and a portion of Building 1. Equipment used by CAM on the Property includes small-scale tools and electric saws.

- Dale: This tenant has occupied the Property for over 20 years, and uses a small tenant space in the western portion of the Building 3 for storage of tools and equipment.

Area and Property Description: The Site is surrounded on all sides by other industrial/ warehousing/commercial operations. The Property is King County parcel no. 640760-0050, mostly rectangular 6.55 acre parcel. The adjacent property to the south is King County parcel no. 883660-0010, a mostly rectangular 8.19 acre parcel. This southern adjacent property is the West Valley Business Park Site (CSID 1006).

The Property is improved with five (5) structures, a storage yard to the east, and covered storage to the south of the main structures (see Figure 2, attached). The majority of the Property is currently occupied by ICU. ICU operations include sandblasting, painting, and applying industrial coatings for corrosion control. ICU occupies a portion of Building 1 and portions of Buildings 3 through 5 (see attached Figure 2). ICU also occupies and/or uses the majority of the covered storage areas, storage buildings, and portable storage containers on the southern portion of the Property, and the portable trailers east of the Building 4. Materials are stored by ICU throughout exterior portions of the Property, with the majority stored in the Storage Yard. A solvent storage area is shown in the south-central part of the Property in Figure 2, attached.

Site History: ICU has reportedly occupied the Property for over 20 years**.** Commercial/industrial activities have evidently taken place at the Property since about 1968. Various cleanup efforts have taken place between 1987 and 2006 in five areas, as shown on Figure 7, attached.

Sources of Contamination: Approximately ten (10) sources area for CVOCs in groundwater are found at the Site. In addition, more discrete sources of heavy oil and lead in soils area also present. Further characterization/verification of source areas on the Site has been requested by Ecology (see attached data gaps table).

Some of the Site source areas are located close to the property boundary to the south, adjacent to the West Valley Business Park Site (CSID 1006). Ecology's ISIS database lists contaminants at this adjacent site as petroleum in soil and groundwater. Heavy oil and diesel soil contamination on this adjacent property was removed and Ecology provided a partial sufficiency letter in 1999 for this cleanup.

Physiographic Setting: The Site is located within Kent, approximately five (5) miles south of Lake Washington and approximately five (5) miles east of Puget Sound. The Site is in located in the floodplain of the Green River, which flow into the Duwamish River to the north. The site is located on relatively flat terrain at an elevation of approximately 25 to 32 feet above mean sea level (ft amsl). The Green River valley bottom extends a little less than a mile to the west, and a little more than a mile to the east.

Surface/Storm Water: Stormwater at the Site is expected to generally flow to the north toward the Green River, which is located approximately 320 feet north of the Site.

Ecological Setting: Approximately 1.4 acres of open space are located with 500 feet of the Site (the banks of the Green River). However, based on completion of MTCA Table 749-1, the Site is exempt from further Terrestrial Ecological Evaluation. Overall, risks to ecological receptors from the releases at the Site appear to be low.

Geology: The Geologic Map of the Renton Quadrangle (U.S. Geological Survey 1965) indicates that the Site is underlain by alluvium. These deposits consist of silt, sand, and clay deposited by the Green River. A roughly three (3) to six (3) feet thick silt unit(s) was noted roughly seven feet below ground surface (ft bgs).

Soil observed during subsurface investigations consisted of loose to medium dense interbedded silty sand, sandy silt, and silt to the maximum depth explored of 20 ft bgs. Wood debris was reportedly observed in multiple borings at depths ranging from approximately 15 to 19.5 feet bgs.

Groundwater: The depth to water in monitoring wells ranged from five (5) to 16 feet below top of casing in measurements taken between 2004 and 2021. Based on a Site potentiometric surface map, groundwater a flows to the north-north west, toward the Green River.

The shallow silt unit discussed has potential to result in partially confining conditions at the Site, as well as potentially offer challenges for cleanup of Site contamination. Ecology notes that soil vapor extraction generally has limited success in silty soils.

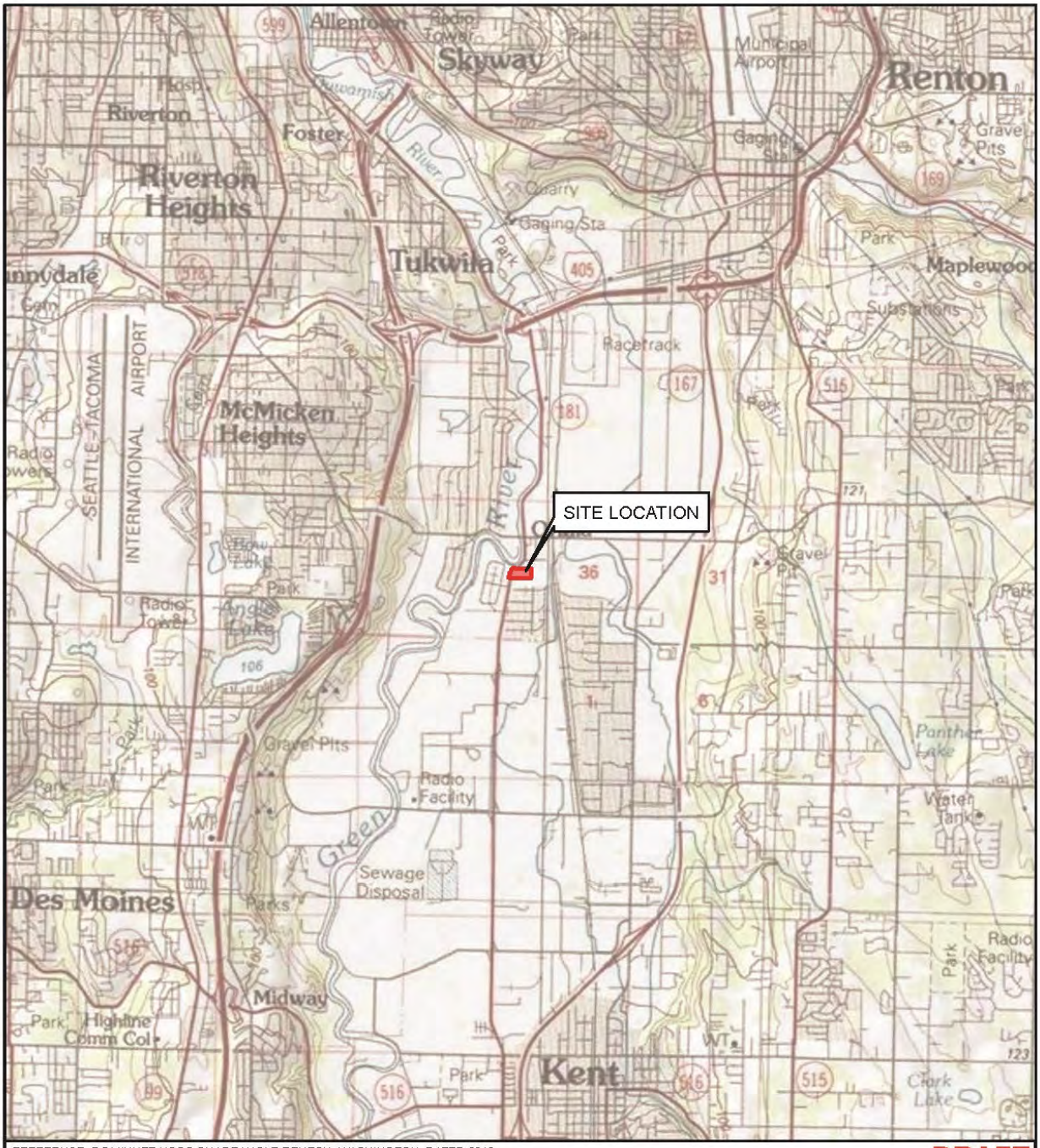
Water Supply: Potable water is provided to the Site and surrounding areas by the City of Kent. The nearest Group A/B wells is located approximately 3,000 feet northeast of the Site and the nearest wellhead protection zone is located approximately 1.3 miles to the southeast.

Extent of Contamination: The extent of VC in groundwater has been generally defined and may be currently limited to the Coatings Unlimited Property. However, some additional data are needed to verify this conclusion, as discussed in Ecology's December 3, 2021 email and provided in the attached data gaps table.

Data Gaps Table

Source Area	Data Gap Need	Description
1	Source area monitoring well	A source area monitoring well is needed in source area #1 in the vicinity of F-31 or EMS-B9. Existing monitoring well FMW-17 was evidently not sampled for CVOCs and it is currently not certain if this location will be sufficient.
2	No data gap noted.	Existing monitoring well FMW-4 appears to serve as a source area monitoring well and the extent of contamination was defined by location B-11.
3	Source area monitoring well	A source area monitoring well is needed in source area #3 in the vicinity of F-29. An appropriate location would be in the NNW portion of the source area.
	Contingency downgradient monitoring well	If elevated CVOC concentrations are found in the source area #3 monitoring well, then a downgradient compliance montioring well will be needed to the NNW of this location.
4	Source area monitoring well	A source area monitoring well is needed in source area #4 in the vicinity of F-28. An appropriate location would be in the NNW portion of the source area.
	Contingency downgradient monitoring well	If elevated CVOC concentrations are found in the source area #4 monitoring well, then a downgradient compliance montioring well may be needed to the NNW of this location.
5	Source area monitoring well	A source area monitoring well is needed in source area #5 in the vicinity of F-30. An appropriate location would be in the NNW portion of the source area.
	Contingency downgradient monitoring well	If elevated CVOC concentrations are found in the source area #5 monitoring well, then a downgradient compliance montioring well will be needed to the NNW of this location.
6	Source area monitoring well	Source area #6 was based on slightly elevated TCA in passive soil gas samples; however, no other data are indicative of a source area between locations F3 and F4. Ecology recommends that the designation "Source Area 6" be used for the vicinity of Area-2-B8 and Area-2-B9. Historical cleanup activities were conducted in this area; however, current conditions need to be assessed and monitoring data are needed to confirm cleanup of groundwater in this area.
7	Source area monitoring well	A source area monitoring well is needed in source area #7 the vicinity of soil gas location F-11.
8	Source area monitoring well	A source area monitoring well is needed in source area #8 in the vicinity of B-10. Existing monitoring well FMW-16 was evidently not sampled for CVOCs and it is currently not certain if this location will be sufficient.
	Contingency downgradient monitoring well	If elevated CVOC concentrations are found in the source area #8 monitoring well, then a downgradient compliance montioring well will be needed to the NNW of this location.
9	Source area monitoring well	A source area monitoring well is needed in source area #9 in the vicinity of F-27. An appropriate location would be in the NNW portion of the source area.
	Contingency downgradient monitoring well	If elevated CVOC concentrations are found in the source area #9 monitoring well, then a downgradient compliance montioring well will be needed to the NNW of this location.
10	No data gap noted	Source area #10 was based on slightly elevated TPH in passive soil gas samples; however, no other data are indicative of a TPH source in the area south of location F-11. Sampling of the new source area monitoring well for Source Area #7 should include analysis by NWTPH-Gx, NWTPH-Dx, and BTEX.
B-5	Monitoring well	The source of VC in groundwater at B-5 at 2 ug/L in 2019 is uncertain. A monitoring well may be needed.
Area-2-B13	No data gap noted	Location MW-1 sampled in 2021 shows VC is no longer above CUL at this location. The source may have been from source area #6 (Area-2-B9).
B-6	No data gap noted	Location only slightly above CUL for VC, source may be from source area #6 (Area-2-B8).
B-7	Monitoring well	Source of VC in groundwater at 3.2 ug/L in 2019 and Arsenic at 64 ug/L uncertain. Monitoring well (temporary, and potentially, permanent) needed.
B-11	Monitoring well	Source of Arsenic in groundwater at 710 ug/L in 2019 uncertain. Monitoring well (temporary, and potentially, permanent) needed.

Site Diagrams



REFERENCE: 7.5 MINUTE USGS QUADRANGLE RENTON, WASHINGTON, DATED 2013

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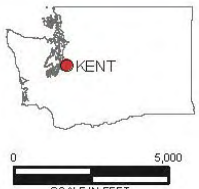

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FIGURE 1

SITE VICINITY MAP
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LEGEND

- FORMER DISCHARGE LINE
- SITE FEATURE
- FORMER UNDERGROUND STORAGE TANK (UST)
- PROPERTY BOUNDARY

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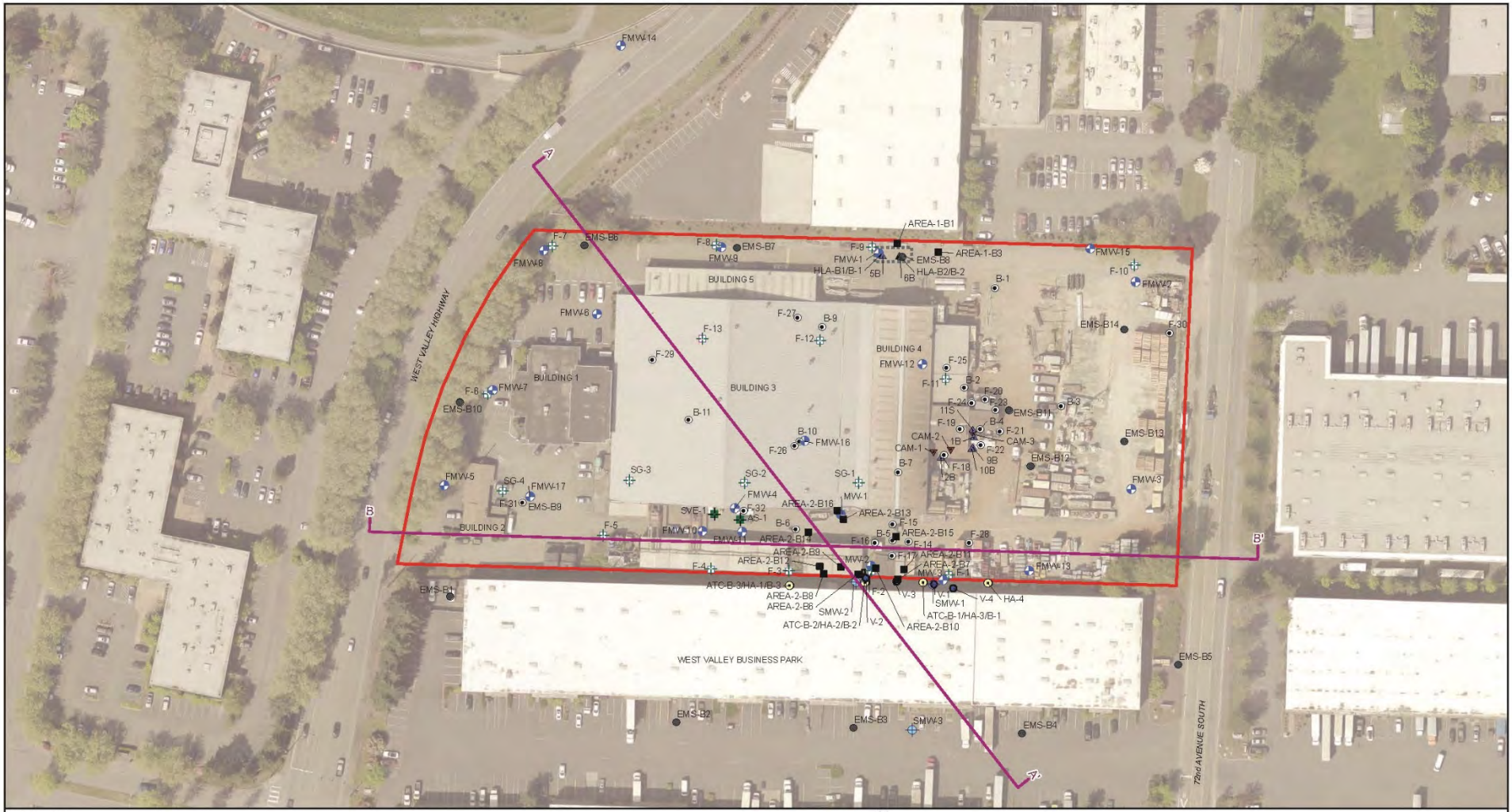
Drawn By: jones Checked By: PK

FIGURE 2

SITE PLAN
18420 68th AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012

Date: 5/11/2021 Disc Reference:
Q:\Projects\2032 Lift Partners\012 18420 68th Ave S\Mapfiles\014\Figure-02_PropertyPlan.mxd



LEGEND

- SUPPLEMENTAL GROUNDWATER SAMPLE (VERSAR, 1998)
- MONITORING WELL (FARALLON, 2019-2021)
- MONITORING WELL (ATC ENVIRONMENTAL INC., 2000)
- AIR SPARGE OR SOIL VAPOR EXTRACTION WELL (FARALLON, 2021)
- SOIL GAS SAMPLE (FARALLON, 2019/2020)
- SOIL SAMPLE (FARALLON, 2019-2021)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2008)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2003)
- BORING (HLA, 1990)
- SOIL SAMPLE (HLA, 1991)
- HAND SAMPLING LOCATION (HLA, 1990)
- HAND AUGER BORING (ATC, 1997)
- CROSS-SECTION
- FORMER UNDERGROUND STORAGE TANK (UST)
- SITE FEATURE
- PROPERTY BOUNDARY

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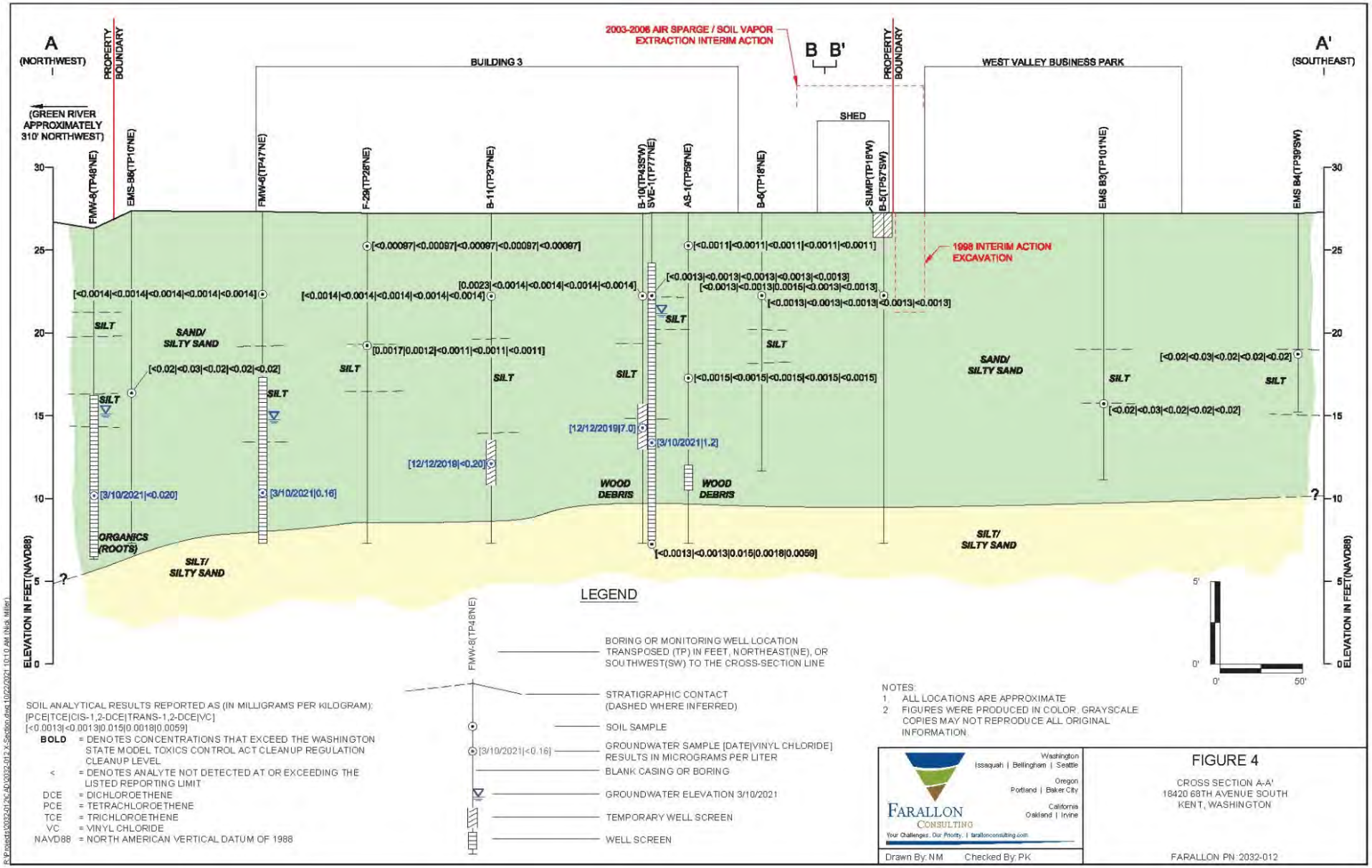
FIGURE 3

SAMPLING LOCATIONS
18420 68th AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012



LEGEND

- FMW-8(TP48'NE) — BORING OR MONITORING WELL LOCATION TRANSPOSED (TP) IN FEET, NORTHEAST(NE), OR SOUTHWEST(SW) TO THE CROSS-SECTION LINE
- STRATIGRAPHIC CONTACT (DASHED WHERE INFERRED)
- SOIL SAMPLE
- [3/10/2021|<0.16] — GROUNDWATER SAMPLE [DATE|VINYL CHLORIDE] RESULTS IN MICROGRAMS PER LITER
- BLANK CASING OR BORING
- GROUNDWATER ELEVATION 3/10/2021
- TEMPORARY WELL SCREEN
- WELL SCREEN

SOIL ANALYTICAL RESULTS REPORTED AS (IN MILLIGRAMS PER KILOGRAM):
[PCE|TCE|CIS-1,2-DCE|TRANS-1,2-DCE|VC]
[<0.0013|<0.0013|0.015|0.0018|0.0059]

- **BOLD** = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
- < = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
- DCE = DICHLOROETHENE
- PCE = TETRACHLOROETHENE
- TCE = TRICHLOROETHENE
- VC = VINYL CHLORIDE
- NAVD88 = NORTH AMERICAN VERTICAL DATUM OF 1988

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FIGURE 4

CROSS SECTION A-A'
18420 68TH AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012

LEGEND

- FORMER INTERIM ACTION AREA
- FORMER DISCHARGE LINE
- SITE FEATURE
- FORMER UNDERGROUND STORAGE TANK (UST)
- PROPERTY BOUNDARY

NOTES:
AS = AIR SPARGE
SVE = SOIL VAPOR EXTRACTION

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Checked By: PK
Date: 10/20/2021
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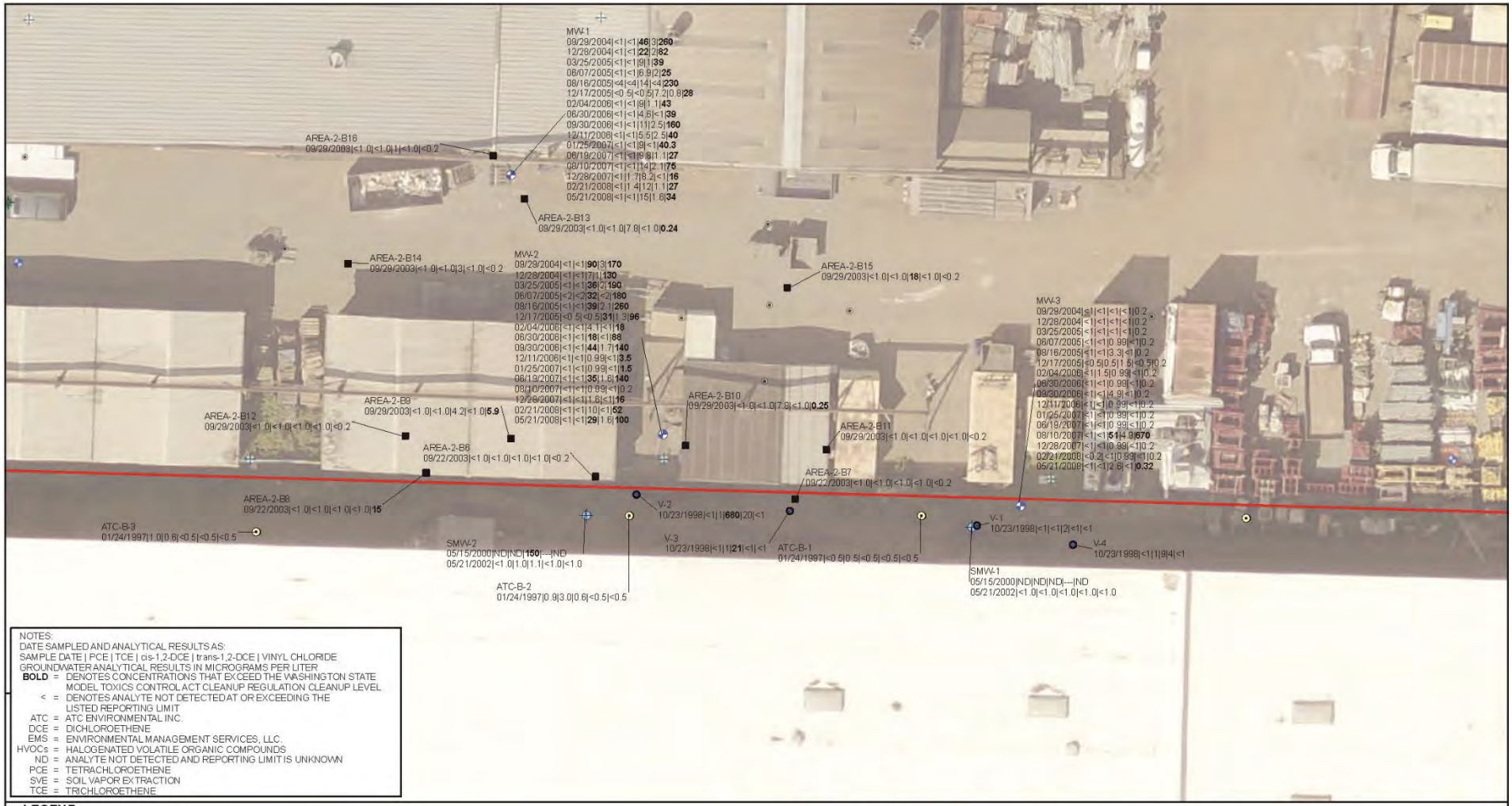
FIGURE 7

INTERIM ACTION AREAS
18420 68th AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012



NOTES:
DATE SAMPLED AND ANALYTICAL RESULTS AS:
SAMPLE DATE | PCE | TCE | cis-1,2-DCE | trans-1,2-DCE | VINYL CHLORIDE
GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
ATC = ATC ENVIRONMENTAL INC.
DCE = DICHLOROETHENE
EMS = ENVIRONMENTAL MANAGEMENT SERVICES, LLC.
HVOCs = HALOGENATED VOLATILE ORGANIC COMPOUNDS
ND = ANALYTE NOT DETECTED AND REPORTING LIMIT IS UNKNOWN
PCE = TETRACHLOROETHENE
SVE = SOIL VAPOR EXTRACTION
TCE = TRICHLOROETHENE

LEGEND

- SUPPLEMENTAL GROUNDWATER SAMPLE (VERSAR, 1998)
- MONITORING WELL (FARALLON, 2019-2021)
- MONITORING WELL (ATC ENVIRONMENTAL INC., 2000)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2003)
- HAND AUGER BORING (ATC, 1997)
- AIR SPARGE OR SOIL VAPOR EXTRACTION WELL (FARALLON, 2021)
- SOIL GAS SAMPLE (FARALLON, 2019/2020)
- SOIL SAMPLE (FARALLON, 2019-2021)
- PROPERTY BOUNDARY

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FIGURE 8B

GROUNDWATER ANALYTICAL RESULTS FOR HVOCs (1997-2008) - FORMER SUMP DISCHARGE AREA
18420 68th AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012

Drawn By: vpehlivan | Checked By: PK | Date: 10/28/2021 | Disc Reference:
\\edgefs\02\01S\Projects\2032 Lift Partners\012 18420 68th Ave S\Maps\ei\014\Figure-08B_Groundwater_HVOCs_FormerSumpDischargeArea.mxd

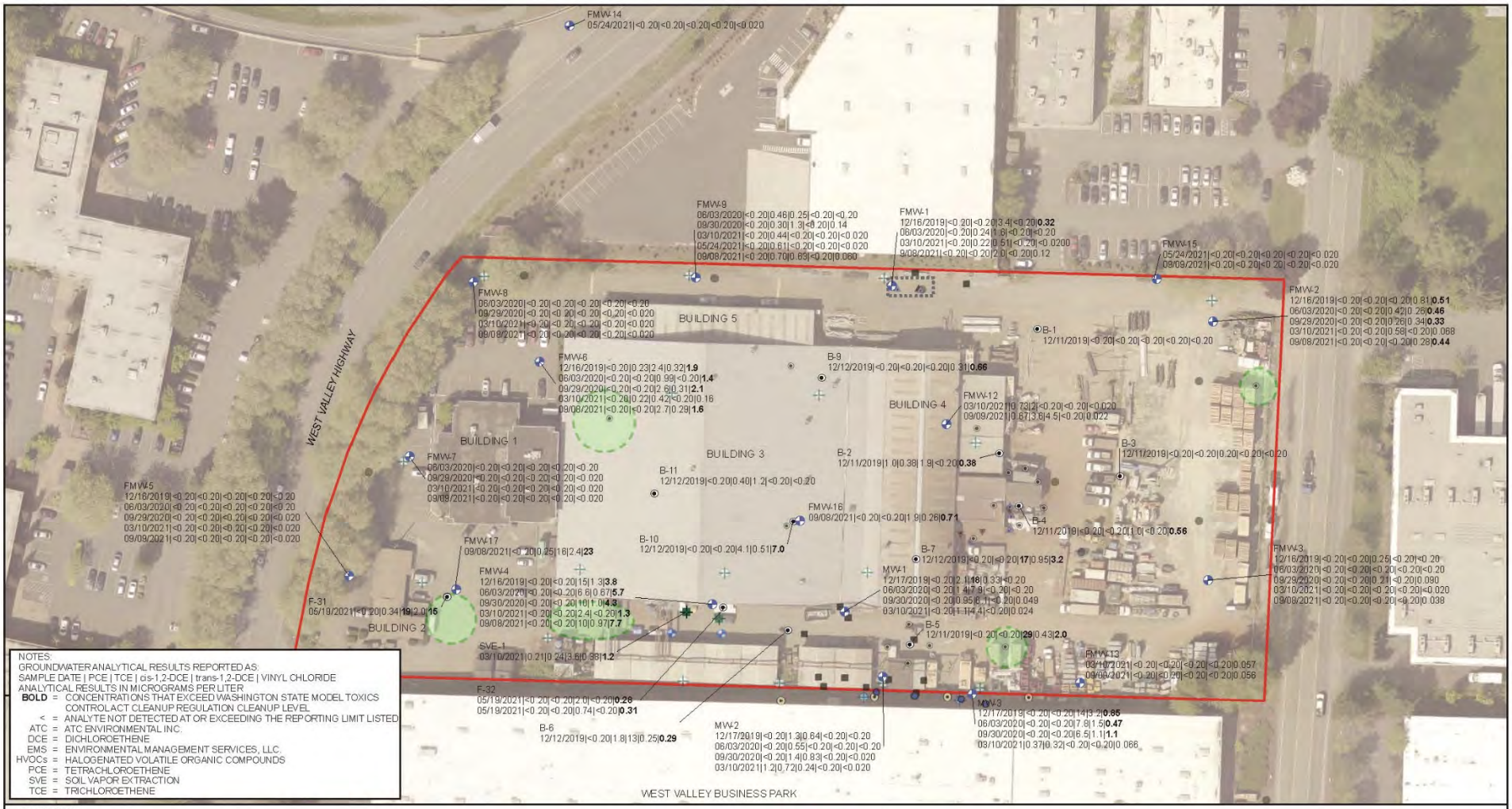
FMW-14
05/24/2021|<0.20|<0.20|<0.20|<0.20|<0.020
FMW-9
06/03/2020|<0.20|0.46|0.25|<0.20|<0.20
09/30/2020|<0.20|0.30|1.3|<0.20|0.14
03/10/2021|<0.20|0.44|<0.20|<0.20|<0.020
05/24/2021|<0.20|0.61|<0.20|<0.20|<0.020
09/08/2021|<0.20|0.70|0.63|<0.20|0.060
FMW-1
12/16/2019|<0.20|<0.20|3.4|<0.20|0.32
06/03/2020|<0.20|0.24|1.6|<0.20|<0.20
03/10/2021|<0.20|0.22|0.51|<0.20|<0.0200
9/08/2021|<0.20|<0.20|2.0|<0.20|0.12
FMW-15
05/24/2021|<0.20|<0.20|<0.20|<0.20|<0.020
08/09/2021|<0.20|<0.20|<0.20|<0.20|<0.020
FMW-2
12/16/2019|<0.20|<0.20|<0.20|0.81|0.51
06/03/2020|<0.20|<0.20|0.42|0.26|0.46
09/29/2020|<0.20|<0.20|0.26|0.34|0.33
03/10/2021|<0.20|<0.20|0.58|<0.20|0.068
09/08/2021|<0.20|<0.20|<0.20|0.28|0.44
FMW-8
06/03/2020|<0.20|<0.20|<0.20|<0.20|<0.20
09/29/2020|<0.20|<0.20|<0.20|<0.20|<0.020
03/10/2021|<0.20|<0.20|<0.20|<0.20|<0.020
09/08/2021|<0.20|<0.20|<0.20|<0.20|<0.020
BUILDING 5
B-1
12/11/2019|<0.20|<0.20|<0.20|<0.20|<0.20
FMW-6
12/16/2019|<0.20|0.23|2.4|0.32|1.9
06/03/2020|<0.20|<0.20|0.99|<0.20|1.4
09/29/2020|<0.20|<0.20|2.6|0.31|2.1
03/10/2021|<0.20|0.22|0.42|<0.20|0.16
09/08/2021|<0.20|<0.20|2.7|0.29|1.6
B-9
12/12/2019|<0.20|<0.20|<0.20|0.31|0.66
FMW-12
03/10/2021|0.73|2|<0.20|<0.20|<0.020
09/09/2021|0.67|3.6|4.5|<0.20|0.022
BUILDING 4
WEST VALLEY HIGHWAY
BUILDING 1
BUILDING 3
FMW-7
06/03/2020|<0.20|<0.20|<0.20|<0.20|<0.20
09/29/2020|<0.20|<0.20|<0.20|<0.20|<0.020
03/10/2021|<0.20|<0.20|<0.20|<0.20|<0.020
09/09/2021|<0.20|<0.20|<0.20|<0.20|<0.020
B-11
12/12/2019|<0.20|0.40|1.2|<0.20|<0.20
B-2
12/11/2019|1.0|0.38|1.9|<0.20|0.38
B-3
12/11/2019|<0.20|<0.20|0.20|<0.20|<0.20
FMW-5
12/16/2019|<0.20|<0.20|<0.20|<0.20|<0.20
06/03/2020|<0.20|<0.20|<0.20|<0.20|<0.20
09/29/2020|<0.20|<0.20|<0.20|<0.20|<0.020
03/10/2021|<0.20|<0.20|<0.20|<0.20|<0.020
09/09/2021|<0.20|<0.20|<0.20|<0.20|<0.020
FMW-16
09/08/2021|<0.20|<0.20|1.9|0.26|0.71
B-4
12/11/2019|<0.20|<0.20|1.0|<0.20|0.56
FMW-17
09/08/2021|<0.20|0.25|16|2.4|23
B-10
12/12/2019|<0.20|<0.20|4.1|0.51|7.0
B-7
12/12/2019|<0.20|<0.20|17|0.95|3.2
FMW-3
12/16/2019|<0.20|<0.20|0.25|<0.20|<0.20
06/03/2020|<0.20|<0.20|<0.20|<0.20|<0.20
09/29/2020|<0.20|<0.20|0.21|<0.20|0.090
03/10/2021|<0.20|<0.20|<0.20|<0.20|<0.020
09/09/2021|<0.20|<0.20|<0.20|<0.20|0.038
FMW-4
12/16/2019|<0.20|<0.20|15|1.3|3.8
06/03/2020|<0.20|<0.20|6.6|0.67|5.7
09/30/2020|<0.20|<0.20|16|1.0|4.3
03/10/2021|<0.20|<0.20|2.4|<0.20|1.3
09/08/2021|<0.20|<0.20|10|0.97|7.7
MW-1
12/17/2019|<0.20|2.1|16|0.33|<0.20
06/03/2020|<0.20|1.4|7.9|<0.20|<0.20
09/30/2020|<0.20|0.95|6.1|<0.20|0.049
03/10/2021|<0.20|1.1|4.4|<0.20|0.024
F-31
05/19/2021|<0.20|0.34|19|2.0|16
BUILDING 2
B-5
12/11/2019|<0.20|<0.20|29|0.43|2.0
SVE-1
03/10/2021|0.21|0.24|3.6|0.38|1.2
FMW-13
03/10/2021|<0.20|<0.20|<0.20|<0.20|0.057
09/08/2021|<0.20|<0.20|<0.20|<0.20|0.056
F-32
05/19/2021|<0.20|<0.20|2.0|<0.20|0.28
05/19/2021|<0.20|<0.20|0.74|<0.20|0.31
MW-3
12/17/2019|<0.20|<0.20|14|3.2|0.85
06/03/2020|<0.20|<0.20|7.8|1.5|0.47
09/30/2020|<0.20|<0.20|6.5|1.1|1.1
03/10/2021|0.37|0.32|<0.20|<0.20|0.066
B-6
12/12/2019|<0.20|1.8|13|0.25|0.29
MW-2
12/17/2019|<0.20|1.3|0.84|<0.20|<0.20
06/03/2020|<0.20|0.55|<0.20|<0.20|<0.20
09/30/2020|<0.20|1.4|0.83|<0.20|<0.020
03/10/2021|1.2|0.72|0.24|<0.20|<0.020
WEST VALLEY BUSINESS PARK
NOTES:
GROUNDWATER ANALYTICAL RESULTS REPORTED AS:
SAMPLE DATE | PCE | TCE | cis-1,2-DCE | trans-1,2-DCE | VINYL CHLORIDE
ANALYTICAL RESULTS IN MICROGRAMS PER LITER
BOLD = CONCENTRATIONS THAT EXCEED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
< = ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED
ATC = ATC ENVIRONMENTAL INC.
DCE = DICHLOROETHENE
EMS = ENVIRONMENTAL MANAGEMENT SERVICES, LLC.
HVOCs = HALOGENATED VOLATILE ORGANIC COMPOUNDS
PCE = TETRACHLOROETHENE
SVE = SOIL VAPOR EXTRACTION
TCE = TRICHLOROETHENE
LEGEND
SUPPLEMENTAL GROUNDWATER SAMPLE (VERSAR, 1998)
MONITORING WELL (FARALLON, 2019-2021)
MONITORING WELL (ATC ENVIRONMENTAL INC., 2000)
AIR SPARGE OR SOIL VAPOR EXTRACTION WELL (FARALLON, 2021)
SOIL GAS SAMPLE (FARALLON, 2019/2020)
SOIL SAMPLE (FARALLON, 2019-2021)
SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2008)
SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2003)
BORING (HLA, 1990)
SOIL SAMPLE (HLA, 1991)
HAND SAMPLING LOCATION (HLA, 1990)
HAND AUGER BORING (ATC, 1997)
POTENTIAL HVOC SOURCE AREAS BASED ON THE RESULTS OF THE OCTOBER 2020 PASSIVE SOIL GAS SURVEY
FORMER UNDERGROUND STORAGE TANK (UST)
PROPERTY BOUNDARY
DRAFT
N
0
80
SCALE IN FEET
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.
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FIGURE 9
GROUNDWATER ANALYTICAL RESULTS FOR HVOCs (2019-2021)
18420 68th AVENUE SOUTH
KENT, WASHINGTON
FARALLON PN: 2032-012
Drawn By: vphilivan
Checked By: PK
Date: 10/28/2021
Disc Reference:
\\edgets02\GIS\Projects\2032 Lift Partners\012 18420 68th Ave S\Mapfiles\014\Figure-09_Groundwater_HVOCs.mxd

NOTES:
SOIL ANALYTICAL RESULTS REPORTED AS:
DEPTH IN FEET BGS | DRO | ORO
ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM

BOLD = CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVELS
< = ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED
^ = DENOTES SAMPLE WAS ANALYZED BY A TOTAL PETROLEUM HYDROCARBON METHOD WHERE THE SPECIFIC CARBON RANGES WERE NOT IDENTIFIED
ATC = ATC ENVIRONMENTAL INC.
BGS = BELOW GROUND SURFACE
DRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
EMS = ENVIRONMENTAL MANAGEMENT SERVICES, LLC
ND = ANALYTE NOT DETECTED AND REPORTING LIMIT IS UNKNOWN
ORO = TPH AS OIL-RANGE ORGANICS
SVE = SOIL VAPOR EXTRACTION

LEGEND

- SUPPLEMENTAL GROUNDWATER SAMPLE (VERSAR, 1998)
- MONITORING WELL (FARALLON, 2019-2021)
- MONITORING WELL (ATC ENVIRONMENTAL INC., 2000)
- AIR SPARGE OR SOIL VAPOR EXTRACTION WELL (FARALLON, 2021)
- SOIL GAS SAMPLE (FARALLON, 2019/2020)
- SOIL SAMPLE (FARALLON, 2019-2021)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2008)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2003)
- BORING (HLA, 1990)
- SOIL SAMPLE (HLA, 1991)
- HAND SAMPLING LOCATION (HLA, 1990)
- HAND AUGER BORING (ATC, 1997)
- FORMER UNDERGROUND STORAGE TANK (UST)
- PROPERTY BOUNDARY

DRAFT

N

0 80
SCALE IN FEET

1. ALL LOCATIONS ARE APPROXIMATE.
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FIGURE 11

SOIL ANALYTICAL RESULTS FOR DRO AND ORO
18420 68th AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012

Drawn By: vpehlivan | Checked By: PK | Date: 10/21/2021 | Disc Reference:
Vedgets02\GIS\Projects\2032 Lift Partners\012 18420 68th Ave S\Mapfiles\014\Figure-11_Soil_DRO-ORO.mxd

NOTES:
SOIL ANALYTICAL RESULTS REPORTED AS:
DEPTH IN FEET BGS | ARSENIC | CADMIUM | CHROMIUM | LEAD
ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
< = ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED
--- = DENOTES SAMPLE NOT ANALYZED
* = SOIL SAMPLE OVER EXCAVATED DURING 1991 INTERIM ACTION
ATC = ATC ENVIRONMENTAL INC.
BGS = BELOW GROUND SURFACE
EMS = ENVIRONMENTAL MANAGEMENT SERVICES, LLC
ND = ANALYTE NOT DETECTED AT OR EXCEEDING AN UNKNOWN REPORTING LIMIT
SVE = SOIL VAPOR EXTRACTION

LEGEND

- SOIL GAS SAMPLE (FARALLON, 2019/2020)
- SOIL SAMPLE (FARALLON, 2019-2021)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2008)
- SOIL SAMPLE (HLA, 1991)
- HAND SAMPLING LOCATION (HLA, 1991)
- LIMITS OF SOIL EXCAVATED 2/21/91 (1.0' DEEP)
- LIMITS OF SOIL EXCAVATED 6/5/91 (0.5 DEEP)
- PROPERTY BOUNDARY

DRAFT

N

0 15

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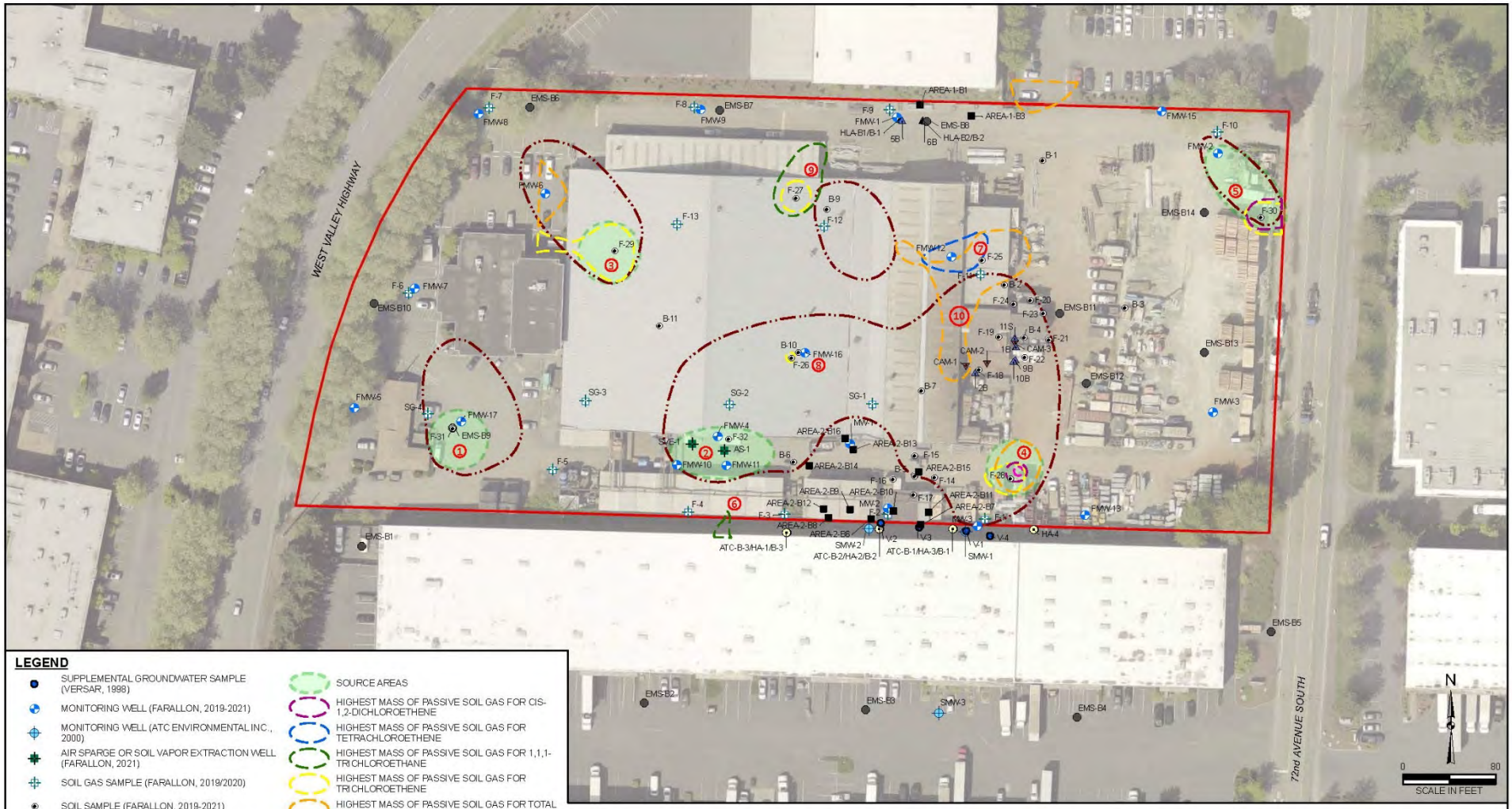
FIGURE 17B

SOIL ANALYTICAL RESULTS FOR METALS - SANDBLAST BOOTH 18420 68th AVENUE SOUTH KENT, WASHINGTON

FARALLON PN: 2032-012

Drawn By: vpehlivan | Checked By: PK | Date: 10/28/2021 | Disc Reference: \\edgefs02\GIS\Projects\2032 Lift Partners\012 18420 68th Ave S\Mapfiles\014\Figure-17B_Detail_Soil-Metals_SandblastBooth.mxd



LEGEND

- SUPPLEMENTAL GROUNDWATER SAMPLE (VERSAR, 1998)
- MONITORING WELL (FARALLON, 2019-2021)
- MONITORING WELL (ATC ENVIRONMENTAL INC., 2000)
- AIR SPARGE OR SOIL VAPOR EXTRACTION WELL (FARALLON, 2021)
- SOIL GAS SAMPLE (FARALLON, 2019/2020)
- SOIL SAMPLE (FARALLON, 2019-2021)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2008)
- SOIL SAMPLE (ENVIRONMENTAL MANAGEMENT SERVICES, LLC, 2003)
- BORING (HLA, 1990)
- SOIL SAMPLE (HLA, 1991)
- HAND SAMPLING LOCATION (HLA, 1990)
- HAND AUGER BORING (ATC, 1997)

- SOURCE AREAS
- HIGHEST MASS OF PASSIVE SOIL GAS FOR CIS-1,2-DICHLOROETHENE
- HIGHEST MASS OF PASSIVE SOIL GAS FOR TETRACHLOROETHENE
- HIGHEST MASS OF PASSIVE SOIL GAS FOR 1,1,1-TRICHLOROETHANE
- HIGHEST MASS OF PASSIVE SOIL GAS FOR TRICHLOROETHENE
- HIGHEST MASS OF PASSIVE SOIL GAS FOR TOTAL PETROLEUM HYDROCARBONS
- HIGHEST MASS OF PASSIVE SOIL GAS FOR VINYL CHLORIDE
- DISSOLVED-PHASE VINYL CHLORIDE EXCEEDING MTCA METHOD A CLEANUP LEVELS FOR GROUNDWATER
- SITE BOUNDARY

MTCA = MODEL TOXICS CONTROL ACT

① POTENTIAL SOURCE AREA NUMBER (SEE CORRESPONDING TABLE 1)

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FIGURE 20

CONFIRMED SOURCE AREAS BASED ON SOIL AND GROUNDWATER ANALYTICAL RESULTS
18420 68th AVENUE SOUTH
KENT, WASHINGTON

FARALLON PN: 2032-012

Drawn By: vpehlivan | Checked By: PK | Date: 12/1/2021 | Disc Reference: \\edgefs02\GIS\Projects\2032 Lit Partners\012 18420 68th Ave S\Mapfiles\014\Figure-20_Confirmed_Source_Areas.mxd

LEGEND

- PROPOSED MONITORING WELL
- MONITORING WELL TO BE DECOMMISSIONED
- MONITORING WELL (FARALLON, 2019-2021)
- MONITORING WELL (ATC ENVIRONMENTAL INC., 2000)
- AIR SPARGE OR SOIL VAPOR EXTRACTION WELL (FARALLON, 2021)
- AIR SPARGE WELL
- ANGLED AIR SPARGE WELL
- HORIZONTAL SOIL VAPOR EXTRACTION LINE
- AIR SPARGE TREATMENT AREA
- PROPOSED REDEVELOPMENT BUILDING FOOTPRINT WITH CHEMICAL-RESISTANT VAPOR BARRIER
- PROPOSED REDEVELOPMENT IMPERVIOUS SURFACE FOOTPRINT
- EXCAVATION AREA
- EXCAVATION SLOPE
- FORMER UNDERGROUND STORAGE TANK (UST)
- PROPERTY BOUNDARY

N

0 100

SCALE IN FEET

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FIGURE 22

CLEANUP ALTERNATIVE 3
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KENT, WASHINGTON

FARALLON PN: 2032-012

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