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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 6, 2022

Dan Sims
VSF Properties, LLC
1615 S. Goldenrod Road
Mount Vernon, WA 98233
(dansims@simshonda.com)

Re: Opinion on Proposed Cleanup of a Property associated with a Site:

- Site Name: North Cascade Ford
- Property Address: 116 West Ferry Street, Sedro Woolley, WA 98284
- Facility/Site No.: 58313566
- Cleanup Site No.: 12075
- VCP Project No.: NW3031

Dear Dan Sims:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of a Property associated with the [SITE NAME] facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issues Presented and Opinion

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

NO. Ecology has determined that no further remedial action will likely be necessary at the Property to clean up contamination associated with the Site.

2. Upon completion of the proposed cleanup, will further remedial action likely still be necessary elsewhere at the Site?

YES. Ecology has determined that further remedial action will likely still be necessary elsewhere at the Site.

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 below.

Description of the Property and the Site

This opinion applies only to the Property and the Site described below. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below.

1. Description of the Property.

The Property includes the following tax parcels in Skagit County, which were affected by the Site and will be addressed by your cleanup:

- P77410
- P77411
- P77412
- P77451
- P77452
- P77492
- P77493
- P109239

The Property does not include the following right-of-way easements, which are located on those parcels:

- West Ferry Street

Enclosure A includes a legal description of the Property. **Enclosure B** includes diagrams of the Site that illustrate the location of the Property within the Site.

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the following releases:

- Petroleum hydrocarbons in the gasoline, diesel, and oil ranges (TPH-G, TPH-D, and TPH-O); benzene, toluene, ethylbenzene, and xylenes (BTEX); polychlorinated biphenyls (PCBs); carcinogenic polycyclic aromatic hydrocarbons (cPAHs); methylene

chloride; arsenic; lead, and cadmium into the Soil.

- TPH-G, TPH-D, TPH-O, BTEX, cPAHs, chlorobenzene, 1,4-dichlorobenzene, and 1,2,3-trichloropropane into the Groundwater.

Those releases have affected more than one parcel of real property, including the parcels identified above.

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

3. Identification of Other Sites that may affect the Property.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the Property is affected by other sites.

Basis for the Opinion

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

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

Analysis of the Cleanup

1. Cleanup of the Property located within the Site.

Ecology has concluded that, upon completion of your proposed cleanup, **no further remedial action** will likely be necessary at the Property to clean up contamination associated with the Site. That conclusion is based on the following analysis:

^[1] <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=12075>

^[2] <https://ecology.wa.gov/publicrecords>

a. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards for the Site and select a cleanup for the Property. The Site is described above and in **Enclosure B**.

The lateral and vertical extent of soil and groundwater impacted by releases at the Site have been adequately defined per MTCA requirements by completion of Site investigations conducted from 2012 through 2021.

Historical groundwater sampling data showed the presence of certain volatile organic chemicals (VOCs) at concentrations above vapor intrusion (VI) screening levels (for example, naphthalene, and 1,4-dichlorobenzene). Please document assessment of the VI exposure pathway by including VOCs in the next quarterly groundwater sampling event, at locations where these chemicals were previously detected.

b. Establishment of cleanup standards for the Site.

Cleanup Levels

Soil

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

The Site is located in an area with limited terrestrial habitat and qualifies for an exclusion from a terrestrial ecological evaluation. There are less than 1.5 contiguous acres of undeveloped land on or within 500 feet of the Site. Cleanup levels protective of terrestrial species are not needed at this Site.

Because the Site is not an industrial property, soil cleanup levels for unrestricted land uses are appropriate. Groundwater at this Site has been impacted by the identified releases. MTCA Method A soil cleanup levels based on protection of groundwater are appropriate.

Groundwater

The highest beneficial use for groundwater under MTCA is considered to be as a drinking water source, unless it can be demonstrated that the groundwater is

not potable. MTCA Method A groundwater cleanup levels are protective of potable use and are therefore the default.

Air

Air cleanup levels are considered necessary to protect against vapor intrusion into existing buildings on adjacent properties. Method B VI screening levels for groundwater are appropriate to assess the VI and air pathways.

Points of Compliance

Soil

The point of compliance for soil at the Site for protection of groundwater is soils throughout the Site.

Groundwater

The standard point of compliance for groundwater is throughout the Site, from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected.

Air

The point of compliance for air is ambient air throughout the Site.

c. Selection of cleanup for the Property.

Ecology has determined the cleanup you proposed for the Property meets the substantive requirements of MTCA. Your proposed cleanup meets minimum cleanup requirements and will not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site. The selected cleanup action for the Property included the following elements:

- Interim actions consisted of removal of two 1,000-gallon underground storage tanks (USTs) in September and October 2016, including:
 - Excavation dewatering, on-Site treatment of petroleum-contaminated groundwater, and discharge under permit to the sanitary sewer;

- Excavation of approximately 600 tons of petroleum-contaminated soil, transport, and off-Site soil disposal under appropriate permits;
 - Confirmation soil sampling to assess the effectiveness of the soil removal; and
 - Excavation backfilling with clean aggregate amended with oxygen-release compound.
- Additional interim actions were completed in February and March 2020, including:
 - Decommissioning of monitoring wells within planned excavation areas;
 - Demolition of Property structures;
 - Removal of one 1,000-gallon UST;
 - Removal of two hydraulic hoists;
 - Excavation of contaminated soil along the Property line with BNSF, per permits obtained from BNSF;
 - Excavation dewatering, on-Site treatment of petroleum-contaminated groundwater, and discharge under permit to the sanitary sewer;
 - Excavation of approximately 3,500 tons of petroleum-contaminated soil, transport, and off-Site soil disposal under appropriate permits;
 - Confirmation soil sampling to assess the effectiveness of the soil removal;
 - Placement of a 60-mil high-density polyethylene liner along the boundary of the excavation along the BNSF property line, to direct contaminated groundwater into the amended excavation backfill;
 - Excavation backfilling with clean aggregate amended with oxygen-release compound;
 - Installation of new monitoring wells to support ongoing assessment of Site impacts to groundwater; and

- Ongoing quarterly groundwater monitoring to evaluate the effectiveness of contamination source removal and confirm that the groundwater contaminant plume is stable or decreasing.

In order for the completed interim actions to be considered the cleanup action for the Property and support a Property No Further Action (NFA) opinion, an Environmental Covenant needs to be recorded on Property tax parcels where soil or groundwater is present at concentrations above cleanup levels. The EC must meet the requirements of [Procedure 440A, Establishing Environmental Covenants under the Model Toxics Control Act, Toxics Cleanup Program Publication Number 15-09-054, revised December 22, 2016³](#).

The EC will include the following components:

- A legal description and a map of the Property showing the parcel numbers to which the EC applies;
- A map and cross section(s) illustrating the locations of soils and groundwater with concentrations of COCs above MTCA cleanup levels;
- Subordination agreements signed by entities holding interests in the Property that could affect maintenance of the integrity of the cleanup action (if appropriate);
- A confirmational groundwater monitoring plan to assess concentrations of contaminants remaining in groundwater; and
- An operation, maintenance, and contingency plan to assure the integrity of the cleanup action provides ongoing protection to human health and the environment.

Once the Covenant content has been approved by Ecology, signed by the Property owner as the Grantor, and signed by Ecology as the Grantee, the Covenant will be recorded with Skagit County and attached as an enclosure to the NFA opinion letter.

2. Cleanup of the Site as a whole.

Ecology has concluded that **further remedial action** will still be necessary elsewhere at

³ <https://apps.ecology.wa.gov/publications/SummaryPages/1509054.html>

the Site upon completion of your proposed cleanup. In other words, while your proposed cleanup may constitute the final action for the Property, it will constitute only an **“interim action”** for the Site as a whole.

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**:

- Change the boundaries of the Site.
- Resolve or alter a person’s liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you 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 Property 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 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 your Property under the Voluntary Cleanup Program (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 web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at (206) 594-0121 or by e-mail at michael.warfel@ecy.wa.gov.

Sincerely,



Michael R. Warfel, VCP Site Manager
Toxics Cleanup Program, NWRO

Enclosures (3): A – Legal Description of the Property
 B – Description and Diagrams of the Site (including the Property)
 C – Basis for the Opinion: List of Documents

cc: Travis Coulter, Coulter Properties LLC (via mail)
 Carolyn Wise, Maul Foster Alongi, (cwise@maulfoster.com)
 Sonia Fernandez, Ecology (sonia.fernandez@ecy.wa.gov)

Enclosure A

Legal Description of the Property

Tax Parcel Number	Parcel Area (acres)	Street Address	Legal Description
P77410	0.29	116 W Ferry St	TAX 92; WEST TO WOOLLEY, VAC NORTHERN AVE N OF SD LOTS & 3 4 & 5, BLK 11
P77411	0.20	116 W Ferry St	TAX 93;WEST TO WOOLLEY LOT 7 BLK 11 THAT PTN OF BLK 11 DESC AS FOL BAAP 301.5' E OF SW COR OF BLK 11 TH E ALG THE N LI OF FERRY ST 60' TH N TO THE S LI OF THE SEATTLE & NORTHERN RLY R/W TH SW'LY ALG SD RLY LI TO A PT DUE N OF POB TH S TO POB
P77412	0.29	116 W Ferry St	WEST TO WOOLLEY BLK 11 TAX 94 BEG 361 1/2' E OF SW COR OF BLK 11 WEST ADD TH E ALG N LINE OF FERRY ST 85' TH N TO R/W OF S & N RLY TH SW'LY ALG R/W TO A PT DUE N OF POB TH S TO POB
P77451	0.80	116 W Ferry St	TOWN OF WOOLLEY PTN VAC NORTHERN AVE & ALLEY ADJ & LTS 1 TO 6 BLK 1
P77452	0.63	100 W Ferry St	TOWN OF WOOLLEY LOT 11 BLK 1 PTN VAC NORTHERN AVE. & EASTERN AVE ADJACENT TO & LOTS 7 TO 11
P77492	0.41	115 W Ferry St	TOWN OF WOOLLEY LOTS 1 TO 6 BLK 7

Tax Parcel Number	Parcel Area (acres)	Street Address	Legal Description
P77493	2.01	115 W Ferry St	TOWN OF WOOLLEY W1/2 VAC EASTERN AVE ADJ & LTS 7 TO 11 BLK 7
P109239	0.53	none	See Below

TWO PARCEL OF LAND SITUATED IN THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 24, TOWNSHIP 35 NORTH, RANGE 4, DESCRIBED AS FOLLOWS: PARCEL 1: BEGINNING AT THE INTERSECTION OF THE NORTH LINE OF FERRY STREET WITH THE CENTERLINE OF 40.0 FOOT WIDE EASTERN AVENUE, VACATED BY THE CITY COUNCIL OF THE CITY OF SEDRO WOOLLEY BY RESOLUTION #101, DULY PASSED AND ADOPTED ON OCTOBER 27, 1930; THENCE NORTHERLY ALONG THE CENTERLINE OF VACATED EASTERN AVENUE 170.0 FEET, MORE OR LESS, TO THE SOUTHERLY LINE OF NORTHERN AVENUE, ACCORDING TO THE OFFICIAL PLAT OF SEDRO WOOLLEY, AS FILED IN THE COUNTY AUDITOR'S OFFICE IN SKAGIT COUNTY; THENCE EASTERLY ALONG SAID SOUTHERLY LINE OF NORTHERN AVENUE 20.3 FEET TO THE EASTERLY LINE OF SAID VACATED EASTERN AVENUE, ALSO BEING ON THE WESTERLY LINE OF BURLINGTON NORTHERN RAILROAD COMPANY'S (FORMERLY NORTHERN PACIFIC RAILWAY COMPANY) 100.0 FOOT WIDE RIGHT OF WAY, BEING A PORTION OF THE SAME PROPERTY AS DESCRIBED IN WARRANTY DEED FROM PHILIP A WOOLLEY AND KATE WOOLLEY DATED APRIL 18, 1890, AND FILED FOR RECORD APRIL 25, 1890 IN VOLUME 10 OF DEEDS, PAGE 450 OF THE RECORDS OF SAID COUNTY; THENCE NORTHERN ALONG SAID WESTERLY RIGHT OF WAY LINE 42.39 FEET TO THE NORTHERLY LINE OF SAID NORTHERN AVENUE, AND BEING 50.0 FEET SOUTHERLY, AS MEASURED AT RIGHT ANGLES FROM BURLINGTON NORTHERN RAILROAD COMPANY'S (FORMERLY GREAT NORTHERN RAILWAY COMPANY) MAIN TRACK CENTERLINE OF THE BURLINGTON TO CONCRETE, WASHINGTON BRANCH LINE, AS ORIGINALLY LOCATED AND CONSTRUCTED; THENCE EASTERLY ALONG SAID NORTH LINE OF NORTHERN AVENUE 26.49 FEET TO A POINT BEING 25.0 FEET WESTERLY, AS MEASURED AT RIGHT ANGLES FROM THE CENTERLINE OF SAID RAILROAD COMPANY'S 100.0 FOOT WIDE RIGHT OF WAY; THENCE SOUTHERLY ALONG A LINE DRAWN PARALLEL WITH THE CENTERLINE OF SAID 100.0 FOOT WIDE RIGHT OF WAY 220.0 FEET, MORE OR LESS, TO THE SAID NORTH LINE OF FERRY STREET; THENCE WESTERLY ALONG SAID NORTH LINE OF FERRY STREET 45.69 FEET TO THE POINT OF BEGINNING; ALSO TOGETHER WITH 'PARCEL 2': BEGINNING AT THE INTERSECTION OF THE NORTH LINE OF WOODWORTH STREET WITH THE CENTERLINE OF 40.0 FOOT WIDE EASTERN AVENUE, VACATED BY THE CITY COUNCIL OF THE CITY OF SEDRO WOOLLEY BY RESOLUTION #101 DULY PASSED AND ADOPTED ON OCTOBER 27, 1930; THENCE NORTHERLY ALONG THE CENTERLINE OF VACATED EASTERN AVENUE 219.3 FEET MORE OR LESS, TO THE SOUTH LINE OF 80.0 FOOT WIDE FERRY STREET; THENCE EASTERLY ALONG SAID SOUTH LINE OF FERRY STREET 45.69 FEET TO A POINT BEING 25.0 FEET WESTERLY, AS MEASURED AT RIGHT ANGLES FROM THE CENTERLINE OF BURLINGTON NORTHERN RAILROAD COMPANY'S (FORMERLY NORTHERN PACIFIC RAILWAY COMPANY) 100.0 FOOT WIDE RIGHT OF WAY, BEING A PORTION OF THE SAME PROPERTY AS DESCRIBED IN WARRANTY DEED FROM PHILLIP A WOOLLEY AND KATE WOOLLEY DATED APRIL 18, 1890 AND FILED FOR RECORD APRIL 25, 1890 IN VOLUME 10 OF DEEDS, PAGE 450 OF THE RECORDS OF SAID COUNTY; THENCE SOUTHERLY

ALONG A LINE DRAWN PARALLEL WITH THE CENTERLINE OF SAID 100.0 FOOT WIDE RIGHT OF WAY 219.3 FEET, MORE OR LESS, TO THE SAID NORTH LINE OF WOODWORTH STREET; THENCE WESTERLY ALONG SAID NORTH LINE OF WOODWORTH STREET 45.69 FEET TO THE POINT OF BEGINNING.

Enclosure B

Description and Diagrams of the Site (including the Property)

Site Description

This section provides Ecology's understanding and interpretation of Site conditions, and is the basis for the opinions expressed in the body of the letter.

Site: The Site is defined by the release of petroleum hydrocarbons in the gasoline-, diesel- and oil-ranges (TPH-G, TPH-D and TPH-O), benzene, toluene, ethylbenzene, xylenes (BTEX), polychlorinated biphenyls (PCBs), methylene chloride, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), arsenic, lead, cadmium to soil. The Site is also defined as the release of TPH-g, TPH-d, TPH-o, BTEX, PAHs, chlorobenzene, 1,4-dichlorobenzene and 1,2,3-trichloropropane to groundwater.

The releases are associated with a former steam and fuel-powered electric plant, former and current auto repair shops, battery servicing and tire vulcanizing facility, coal-storage sheds associated with former train depots and gasoline, heating oil and waste oil aboveground and underground storage tanks (AST and UST). The Site is located at 100, 115, and 116 West Ferry Street in Sedro-Woolley, Washington (Property); see **Figure 1**.

Area and Property Description: The Property corresponds to Skagit County parcel numbers P77410, P77411, P77412, P77451, P77452, P109239, P77493 and P77492 which is a total of approximately 5.2 acres in size (**Figure 2**). The Property is bisected by West Ferry Street. The Property was formerly occupied by two buildings, one on the north side of West Ferry Street and one on the south side of West Ferry Street.

The Property is bounded by BNSF Railway to the north, Eastern Avenue and a True Value hardware store to the east; Napa Auto Parts, and a Chevron gas station to the west on the north side of West Ferry Street and residences and Rita Street to the west on the south side of West Ferry Street. Residential homes and Woodward Street are located to the south. Land use surrounding the Site includes commercial businesses and residential homes.

Property History and Current Use: The first known development of the Property was primarily for residences in the early 1900s through the 1950s. The 1907 Sanborn map identifies an electric plant, powered by steam and fuel oil located on the northern portion of P77451, which was replaced by a woodshed and wood yard in the 1920s. By 1925, an automobile shop with an oil house was historically located in the same location as the current automobile dealership building.

The automobile dealership and repair facility formerly occupied the building on the north side of West Ferry Street (the building is primarily on parcel P77451). The original dealership building was built in approximately 1949. Three additions to the building constructed in the early to mid-1960s are still present today. The office building located on the south side of West

Ferry Street (primarily on parcel P77493) was constructed in 2007. The automobile dealership building was demolished in 2020 to facilitate removal of contaminated soil.

A hospital was located on parcel P77412 during the early 1900s and 1910s. Prior to construction of the dealership building two residential homes and a feed mill and storage facility (Lentz Supply) was located on parcel P77452 from the early 1900s to at least the 1950s. A hotel was located on parcel P77492 from the early 1900s to at least the 1950s. By 1925, a battery servicing and tire vulcanizing facility with oil and gas storage was formerly located on the southern portion of parcel P77410.

A railroad depot was located on the northern half of parcel P109239 from the early 1900s to at least the 1950s. A second depot was located on parcel P77493 during the 1920s, which became a veterinary office and a fuel and transfer station by the 1940s and 1950s.

Contaminant Source and History: Contamination sources on the Property and the Site are shown on **Figure 2**. A 200-gallon heating oil UST was located on the east side of the dealership building approximately 40 feet in front of the entrance door to the showroom. A gasoline UST was located in front of the garage door on the south side. The gasoline UST was closed-in-place in the 1960s however no soil or groundwater samples were collected at the time of decommissioning.

The heating oil and gasoline USTs were both located in the southeastern portion of parcel P77451. A 10,000-gallon AST oil tank was historically located on the north central portion of parcel P77451. Coal sheds were located on eastern parcels P109239 and P77493. Coal was likely mixed with soil in association with historical operations at the train depots and later covered with fill material.

Physiographic Setting: The Site is located within the Puget Sound Lowland physiographic province, which is a north-south oriented topographic depression bounded by the Olympic mountains to the west and the Cascade range to the east. Sedro Woolley is located in a 2-mile-wide section of the Skagit Valley, a lowland delta area of the Skagit River. The Property is at an elevation of approximately 56 feet above mean sea level.

Surface/Storm Water System: Brickyard Creek is the nearest surface water located approximately 2,800 feet north (upgradient with respect to groundwater flow) of the Property. The Skagit River is the nearest downgradient surface water, located approximately 7,000 feet south of the Property. Pavement surfaces that are sloped drain towards catch basins that discharge to the municipal stormwater system.

Ecological Setting: The Property is located in a mixed-use commercial and residential area primarily covered with buildings, asphalt, and concrete, with strips of gravel cover on either side of the rail line and along the eastern side of the Property. Harry Osborne Park and Caboose, a small park (approximately 260 feet by 65 feet) with a grass lawn, a tree, and

manicured plant beds, is located approximately 225 feet west of the westernmost parcel. Small yards with manicured lawns and trees are located to the west of the Property on the south side of Ferry Street. A vacant triangular-shaped dirt lot covering approximately 1.5 acres is located northeast of the Property.

Geology: Approximately 1.5 feet of gravelly sand fill was observed under the asphalt pavement, concrete building foundation, and gravel driveways. Underlying the fill and in areas where fill was not encountered, sand with varying amounts of silt extended to approximately 10 feet below ground surface (bgs). At approximately 10 feet bgs, a well-sorted sand with a trace of woody debris and gravel extended down to 25 feet bgs. A poorly sorted sand extended to approximately the maximum explored depth of 32.9 feet bgs.

An approximately 2-foot-thick lens of clay and silt was encountered in some locations at approximately 15 feet bgs. Beneath the former coal storage area, a 2- to 5-foot-thick layer of coal-like material and gravelly sand with coal fragments was encountered. Site geologic conditions are illustrated on **Figure 3**.

Groundwater: Groundwater was typically encountered between approximately 5 and 10 feet bgs. Groundwater flow is primarily to the south (**Figure 4**).

Water Supply: The primary water source for the city of Sedro Woolley is the Judy Reservoir, which collects water from the Skagit River and multiple tributary streams. Three groundwater wells are located within a half-mile radius of the Property. The nearest well is located 450 feet west of the Property (an irrigation well). The other two wells (use unknown) are located just under a half-mile to the southwest.

Release and Extent of Soil and Groundwater Contamination: Four Areas of Concern (AOC) were identified in association with prior and current use of the Property (see **Figure 2**). In AOC 1 TPH-G, TPH-D, TPH-O, lead, PCBs, and cPAHs were detected in soil at concentrations exceeding MTCA Method A cleanup levels on the north side of the auto sales and service building. TPH-G, TPH-D, TPH-O, 1,2,3-trichloropropane, 1,4-dichlorobenzene, and chlorobenzene were detected in groundwater at concentrations exceeding respective MTCA Method A or B cleanup levels.

A former 10,000-gallon oil above-ground storage tank (AST), active 500-gallon waste oil UST, former steam and fuel-powered electric plant, former automobile repair shop with oil house, and automobile repair shop are all potential former uses that may have contributed to contamination identified in the northern portion of parcel P77451. The source of the gasoline contamination is unknown at this time.

In AOC 2, south of the auto service area, TPH-G and TPH-D were detected in saturated soil samples at concentrations exceeding MTCA Method A cleanup levels on the north side of the former heating oil UST and south of the former gasoline UST. TPH-G, TPH-D, and TPH-O were

detected in groundwater samples collected from monitoring well MW-2, located between the former heating oil UST and former waste oil tank.

In AOC 3, arsenic, lead, cadmium and cPAHs were detected at concentrations exceeding MTCA Method A cleanup levels (depths of 0.3 to 2.6 feet bgs; coal observed in soils to a depth of 5 feet bgs) along the eastern edge of the Property, in association with former coal sheds. Two groundwater samples were collected in the vicinity of the former coal sheds. Arsenic, barium, cadmium and cPAH contamination was detected at concentrations below MTCA Method A cleanup levels.

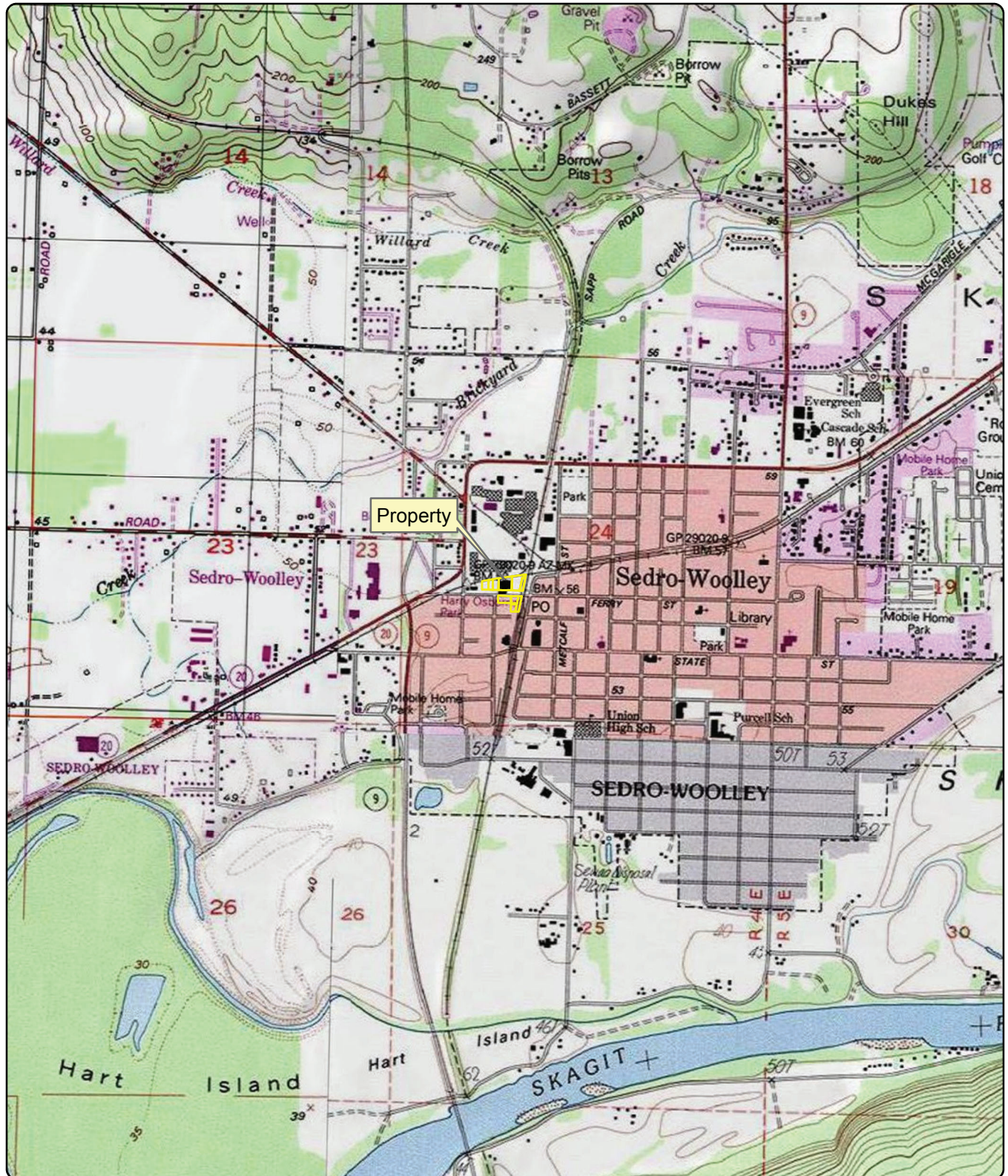
In AOC 4, releases are associated with an area marked as a “gas and oil” on Sanborn maps located at the tire vulcanizing and battery service facility. TPH-G and volatile petroleum hydrocarbon (VPH) concentrations were not detected in soil. TPH-D and TPH-O were detected in groundwater at a concentration exceeding the MTCA Method A cleanup level.

Interim Actions: The following interim actions were completed at the Site in 2016 and 2020 within identified remedial action areas (**Figure 5**):

- Removal of two 1,000-gallon USTs, one 1,000-gallon UST, and two hydraulic hoists;
- Excavation dewatering, on-Site treatment of dewatering discharge, and discharge under permit to the sanitary sewer;
- Excavation of approximately 4,100 tons of petroleum-contaminated soil, transport, and off-Site soil disposal under appropriate permits;
- Confirmation soil sampling to assess the effectiveness of the soil removal;
- Excavation backfilling with clean aggregate amended with oxygen-release compound; and
- Ongoing quarterly groundwater monitoring to evaluate the effectiveness of contamination source removal and confirm that the groundwater contaminant plume is stable or decreasing.

Concentrations of contaminants of concern in soil and groundwater following completion of the interim actions are shown on **Figures 6 through 10**.

Site Diagrams



Property Address: 116 W Ferry Street, Sedro-Woolley, Washington
 Source: US Geological Survey (1990) 7.5-minute
 topographic quadrangle: Sedro-Woolley North
 Section 24, Township 35 North, Range 4 East

Legend

Property Parcel

Figure 1-1 Site Location

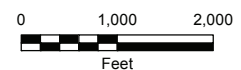
North Cascade Ford Property
 Sedro-Woolley, Washington

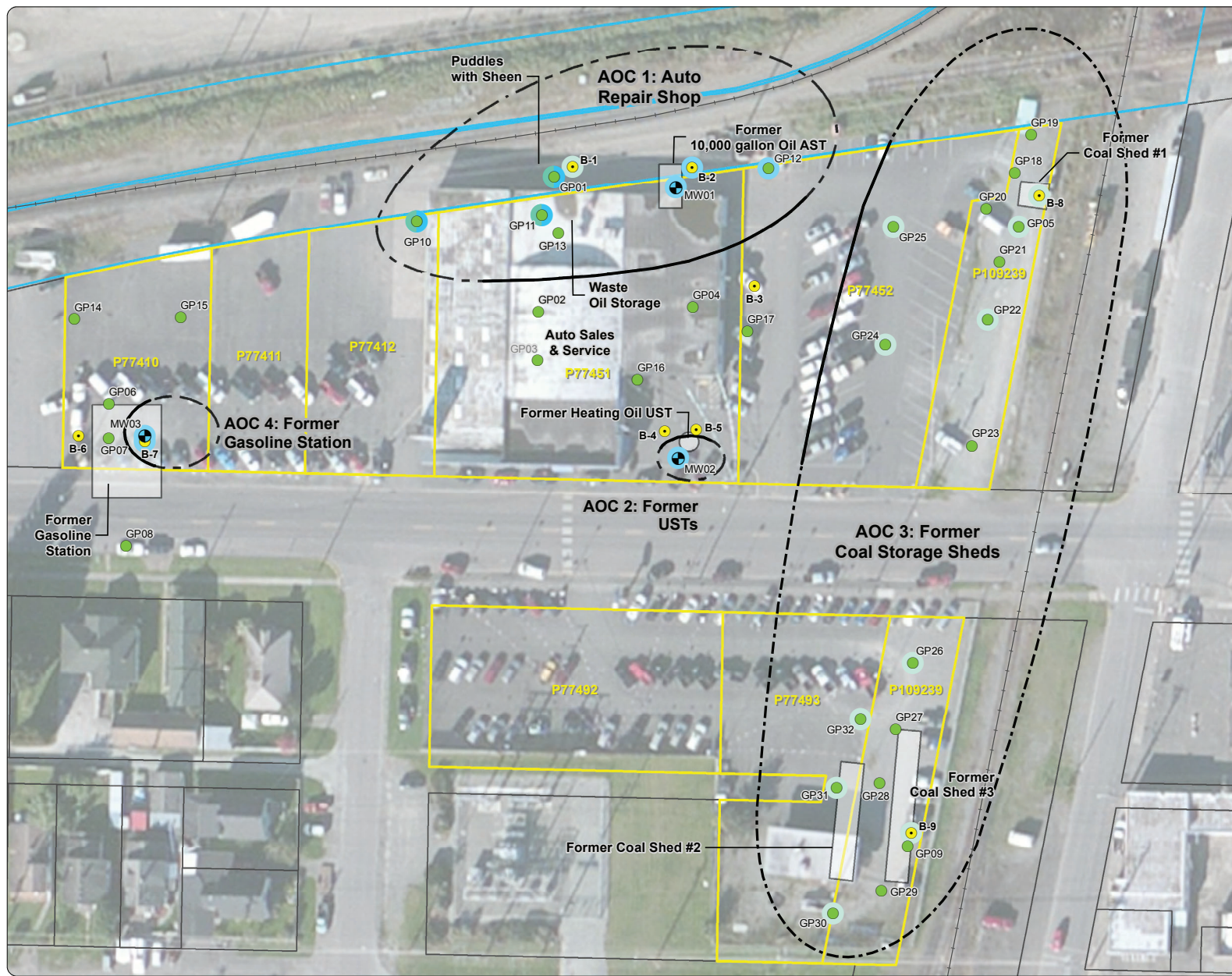
Enclosure B, Figure 1



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 p. 971 544 2139 | www.maulfooster.com

This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information.





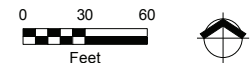
**Figure 9-1
Areas of Concern**

North Cascade Ford Property
Sedro-Woolley, Washington

Legend

- Boring Location
- Monitoring Well
- Phase II ESA Boring Location
- Soil Exceedance*
- Groundwater Exceedance*
- Soil and Groundwater Exceedance*
- AOC Boundary (dashed where inferred)
- Property Parcel and Parcel Number
- BNSF-owned Parcels
- Skagit County Parcels

- Notes:**
1. All historical feature locations are approximate and shown for relative location reference only.
 2. Chemical detections in soil samples that were collected below the water table during the 2011 Phase II ESA were not compared to soil cleanup levels.
 3. AOC = area of concern
 4. AST = aboveground storage tank
 5. BNSF = Burlington Northern Santa Fe Railway Company
 6. ESA = environmental site assessment
 7. UST = underground storage tank
- *Model Toxics Control Act Method A cleanup level exceedance detected.



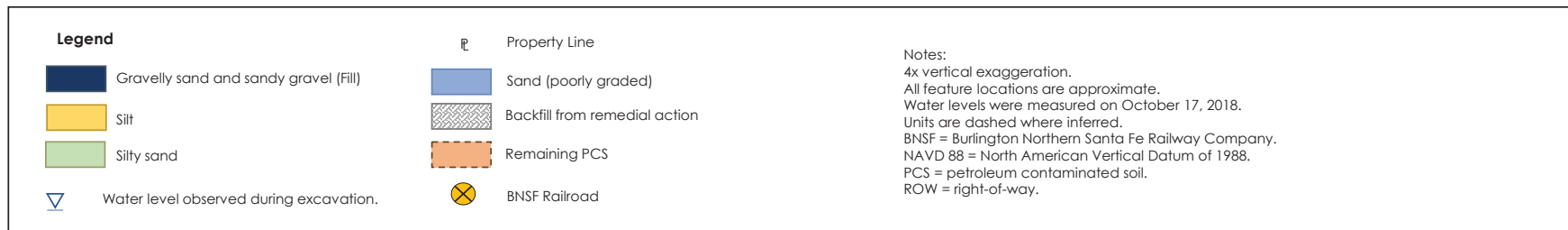
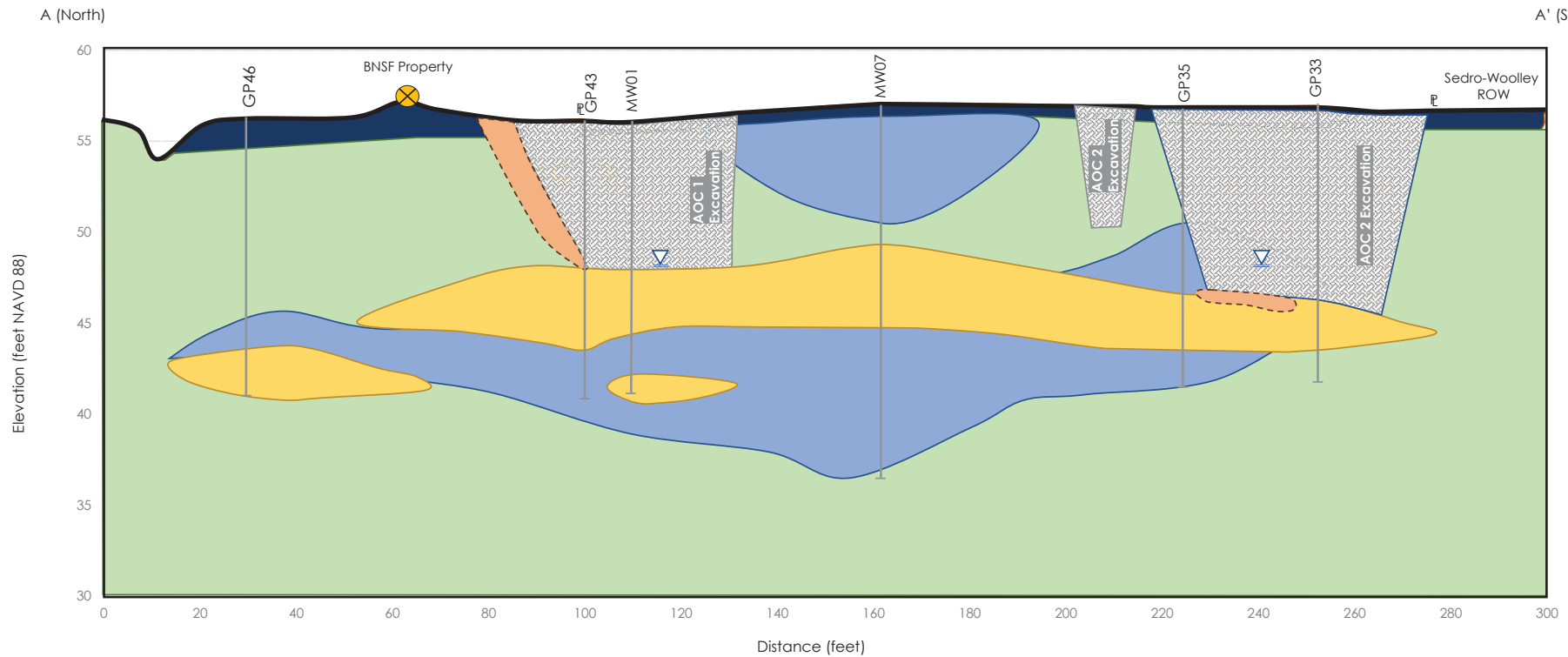
Source: Aerial photograph obtained from Esri, ArcGIS Online; parcels obtained from Skagit County GIS Department.

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Enclosure B, Figure 2

Figure 3
Geologic Cross Section A-A'
North Cascade Ford Property
116 West Ferry Street, Sedro-Woolley, Washington



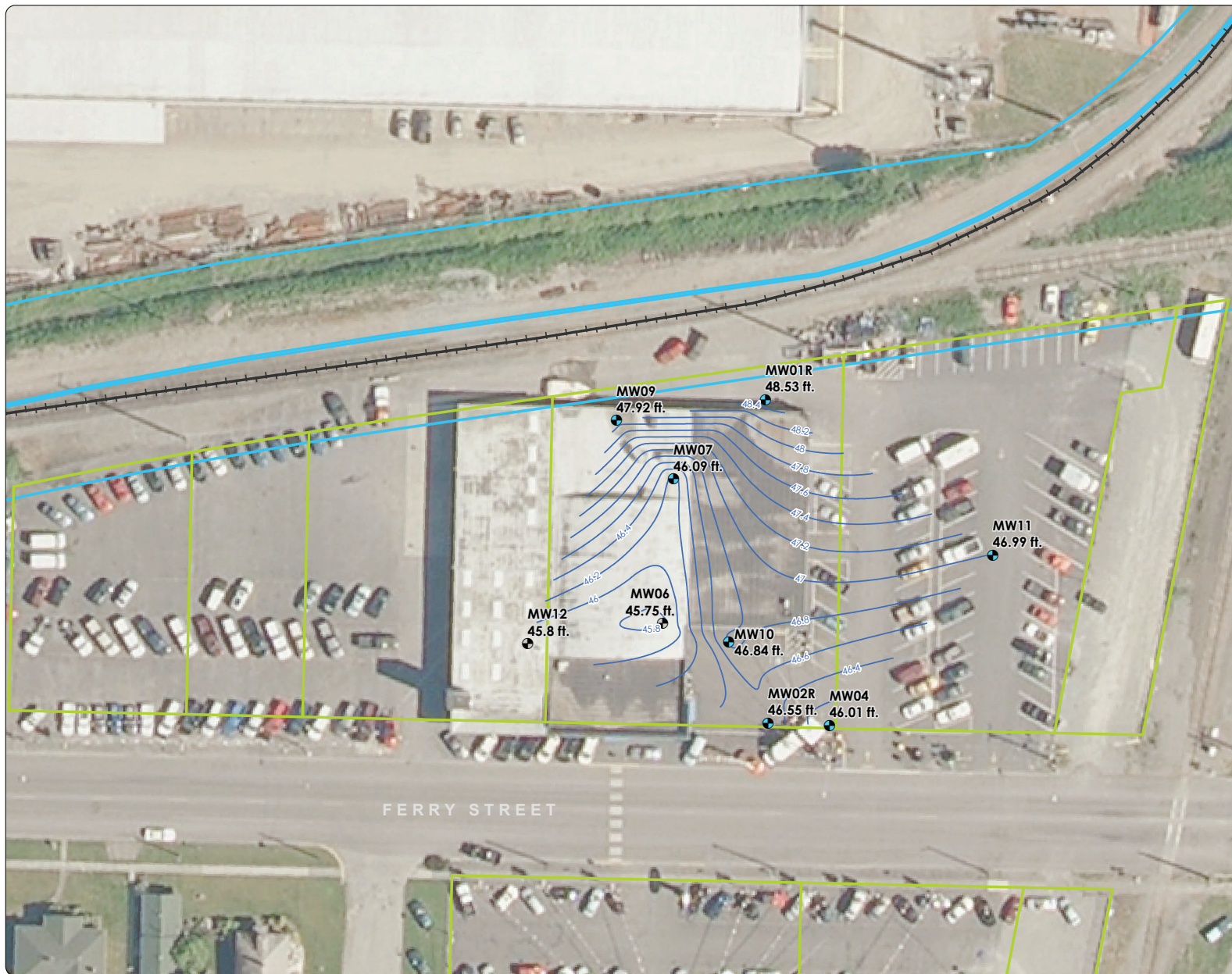
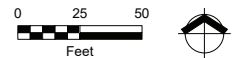


Figure 3
Groundwater Elevation
Contours - September 2021
 North Cascade Ford Property
 Sedro-Woolley, Washington

Legend

- Compliance Monitoring Well
- Other Monitoring Well
- Groundwater Elevation Contour (feet NAVD 88; 0.2-ft. interval)
- Property Parcel
- BNSF-Owned Parcel

Notes:
 The surveyed Property parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the Property and BNSF parcels. Water levels measured on September 27, 2021. BNSF = Burlington Northern Santa Fe Railway. ft. = feet.
 NAVD 88 = North American Vertical Datum of 1988.

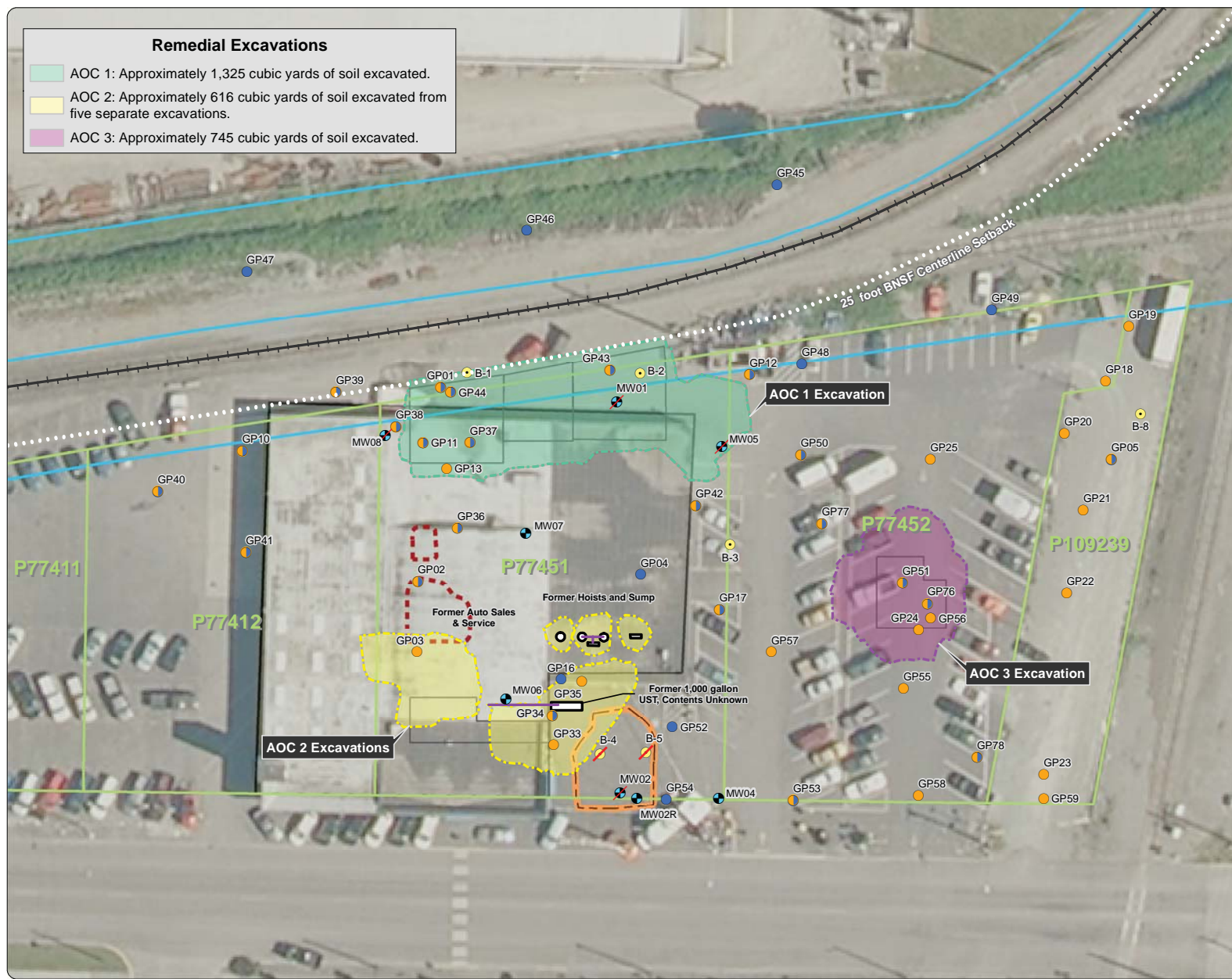


Sources:
 Adjacent parcel boundaries obtained from Skagit County
 Aerial photograph obtained from Mapbox.
 Property parcel boundaries surveyed by Wilson Engineering, LLC.

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Enclosure B, Figure 4



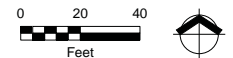
**Figure 1-3
Remedial Action Areas**
North Cascade Ford Property
Sedro-Woolley, Washington

Legend

- Monitoring Well
- ⊗ Decommissioned Monitoring Well
- Phase II ESA Boring (WES, 2011)
- ⚡ Phase II ESA Boring, Overexcavated (WES, 2011)
- Soil Boring (MFA)
- Reconnaissance Groundwater Boring (MFA)
- Soil & Reconnaissance Groundwater Boring (MFA)
- Product Line
- BNSF Railroad Centerline
- ▭ Initial Remedial Excavation Extent
- ▭ UST Removal Excavation (MFA)
- ▭ Hoist Removal Excavation (ZGA, 2017)
- ▭ Approximate Building Footprint
- ▭ Property Parcel
- ▭ BNSF-owned Parcel

Notes:
All features are approximate.
All structures on the property were removed prior to remedial action.
The excavations areas are set back from the BNSF railroad centerline by 25 feet.
The surveyed property parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the Property and BNSF parcels.
AOC = area of concern.
BNSF = Burlington Northern Santa Fe.
ESA = environmental site assessment.
Property = North Cascade Ford Property.
UST = underground storage tank.
WES = Whatcom Environmental Services.
ZGA = Zipper Geo Associates.

Sources:
Aerial photograph obtained from ArcGIS Online.
Excavation extents surveyed by Pacific Geomatic Services, Inc. in March 2020.
Property parcel boundaries surveyed by Wilson Engineering, LLC.
Adjacent parcel boundaries obtained from Skagit County.



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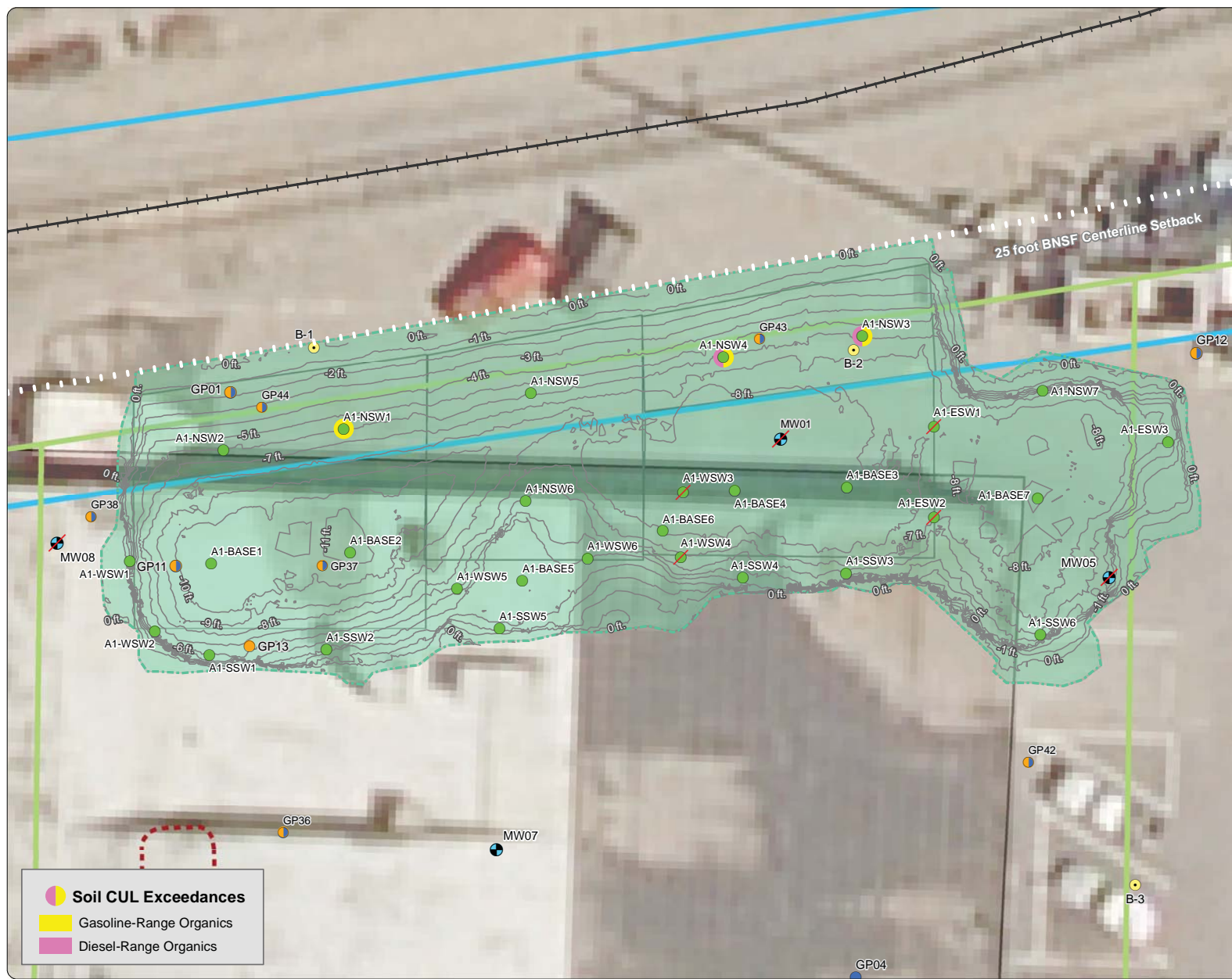


Figure 4-1
AOC 1: Remedial Excavation and Sample Locations

North Cascade Ford Property
Sedro-Woolley, Washington

Legend

- Confirmation Soil Sample
- ✕ Confirmation Soil Sample, Overexcavated
- Monitoring Well
- ✕ Decommissioned Monitoring Well
- Soil Boring (MFA)
- Reconnaissance Groundwater Boring (MFA)
- Soil & Reconnaissance Groundwater Boring (MFA)
- Phase II ESA Boring (WES, 2011)
- BNSF Railroad Centerline
- Initial Remedial Excavation Extent
- Hoist Removal Excavation (ZGA, 2017)
- Approximate Building Footprint
- Property Parcel
- BNSF-owned Parcel

Notes:
All features are approximate.
Contours are relative to the ground surface.
The excavation areas are set back from the BNSF railroad centerline by 25 feet.
Soil was screened to MTCA Method A CULs.
The surveyed Property parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the Property and BNSF parcels.
AOC = area of concern.
BNSF = Burlington Northern Santa Fe.
CUL = cleanup level.
ESA = environmental site assessment.
ft = feet.
MTCA = Model Toxics Control Act.
Property = North Cascade Ford Property.
WES = Whatcom Environmental Services.
ZGA = Zipper Geo Associates.

Sources:
Aerial photograph obtained from ArcGIS Online.
Excavation surveyed by Pacific Geomatic Services, Inc. in March 2020.
Property parcel boundaries surveyed by Wilson Engineering, LLC.
Adjacent parcel boundaries obtained from Skagit County.

0 5 10
Feet

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Enclosure B, Figure 6

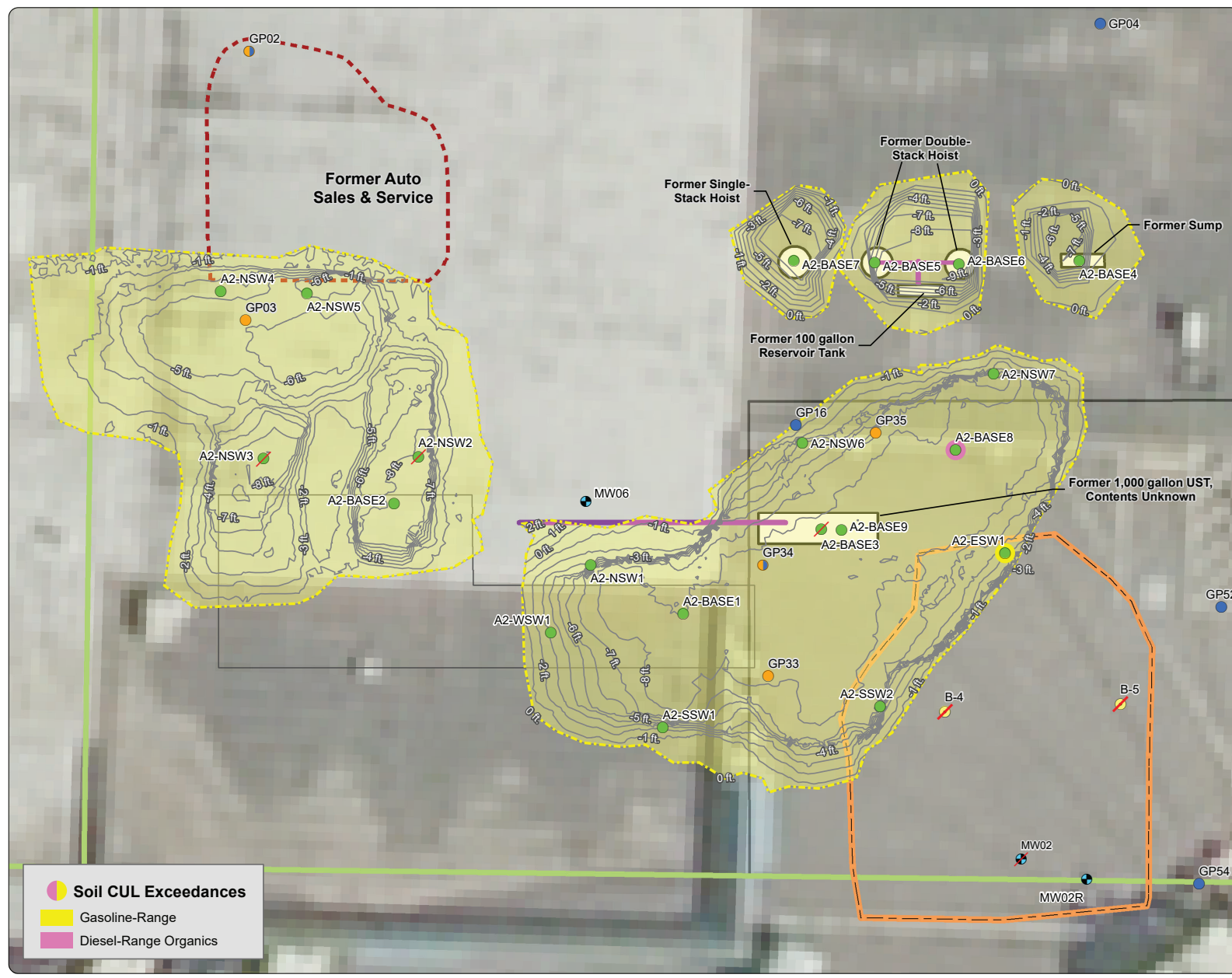


Figure 4-2
AOC 2: Remedial Excavation and Sample Locations

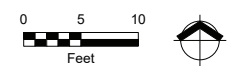
North Cascade Ford Property
Sedro-Woolley, Washington

Legend

- Confirmation Soil Sample
- Confirmation Soil Sample, Overexcavated
- Monitoring Well
- Decommissioned Monitoring Well
- Phase II ESA Boring, Overexcavated (WES, 2011)
- Soil Boring (MFA)
- Reconnaissance Groundwater Boring (MFA)
- Soil & Reconnaissance Groundwater Boring (MFA)
- Product Line
- Initial Remedial Excavation Extent
- UST Removal Excavation (MFA, 2016)
- Hoist Removal Excavation (ZGA, 2017)
- Approximate Building Footprint
- Property Parcel

Notes:
All features are approximate.
Contours are relative to the ground surface.
Soil was screened to MTCA Method A CULs.
AOC = area of concern.
CUL = cleanup level.
ESA = environmental site assessment.
MFA = Maul Foster & Alongi, Inc.
MTCA = Model Toxics Control Act.
Property = North Cascade Ford Property.
UST = underground storage tank.
WES = Whatcom Environmental Services.
ZGA = Zipper Geo Associates.

Sources:
Aerial photograph obtained from ArcGIS Online.
Excavation surveyed by Pacific Geomatic Services, Inc. in March 2020.
Property parcel boundaries surveyed by Wilson Engineering, LLC.
Adjacent parcel boundaries obtained from Skagit County.



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Enclosure B, Figure 7



Figure 4-3
AOC 3: Remedial Excavation
and Sample Locations

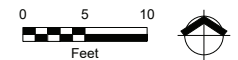
North Cascade Ford Property
Sedro-Woolley, Washington

Legend

- Confirmation Soil Sample
- Soil Boring (MFA)
- Soil & Reconnaissance Groundwater Boring (MFA)
- Initial Remedial Excavation Extent
- Property Parcel

Notes:
All features are approximate.
Contours are relative to the ground surface.
Soil was screened to MTCA Method A CULs.
AOC = area of concern.
CUL = cleanup level.
ft. = feet.
MTCA = Model Toxics Control Act.
Property = North Cascade Ford Property.

Sources:
Aerial photograph obtained from ArcGIS Online.
Excavation surveyed by Pacific Geomatic Services, Inc. in March 2020.
Property parcel boundaries surveyed by Wilson Engineering, LLC.
Adjacent parcel boundaries obtained from Skagit County.



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Enclosure B, Figure 8

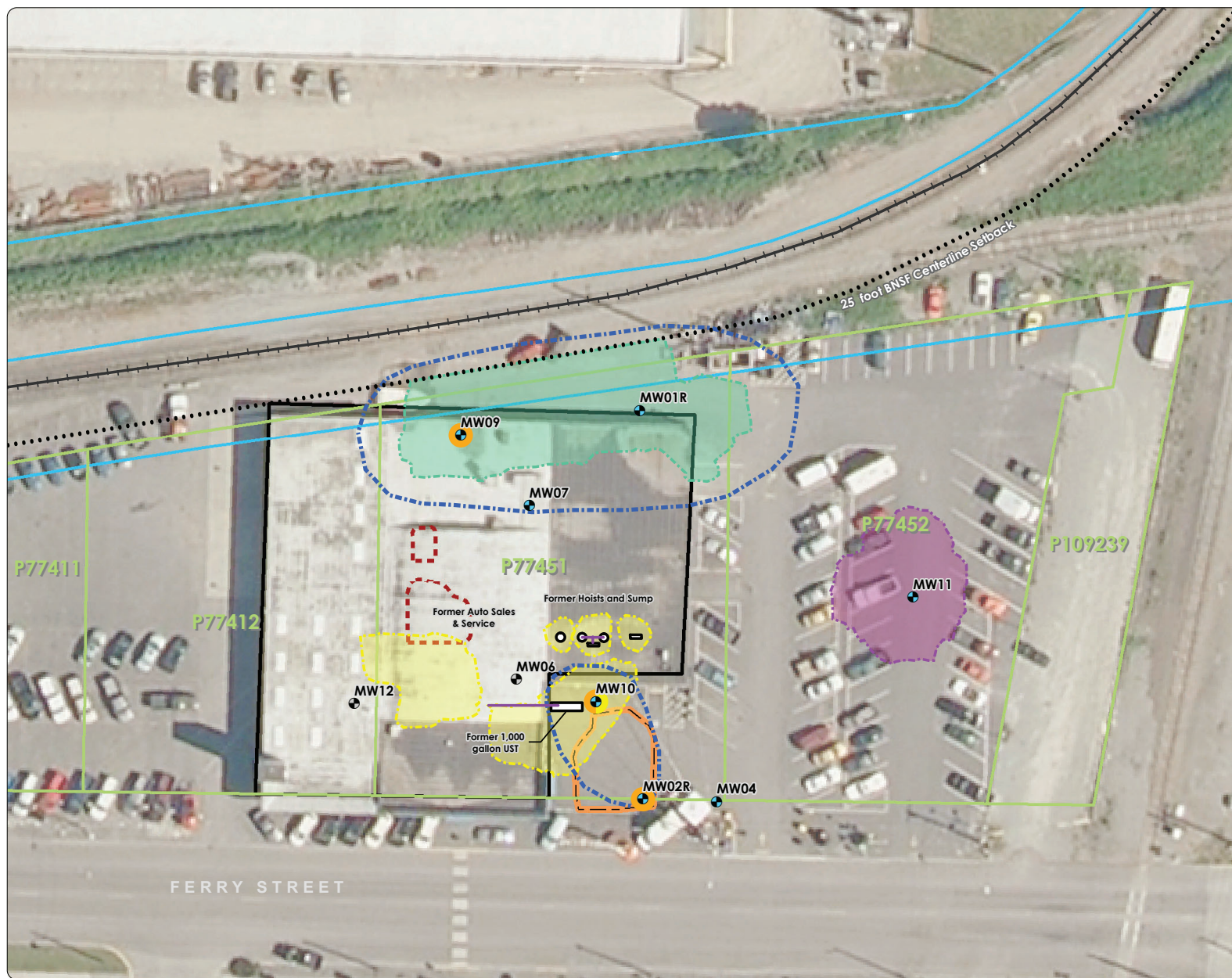


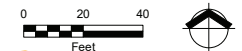
Figure 4
Groundwater Exceedances -
September 2021
 North Cascade Ford Property
 Sedro-Woolley, Washington

Legend

- Compliance Monitoring Well
- Other Monitoring Well
- DRO Exceedance
- Heavy Oils Exceedance
- Product Line
- AOC 1 Excavation (MFA, 2020)
- AOC 2 Excavation (MFA, 2020)
- AOC 3 Excavation (MFA, 2020)
- - - Estimated Extent of Petroleum Impacts in Groundwater
- UST Interim Action (MFA, 2016)
- - - Hoist Removal Excavation (ZGA, 2017)
- Former Building Footprint
- Property Parcel
- BNSF-Owned Parcel

Notes:
 All features are approximate.
 All structures on the property were removed prior to remedial action.
 The excavations areas are set back from the BNSF railroad centerline by 25 feet.
 Heavy oils were compared to the DRO cleanup level.
 The surveyed Property parcel boundaries do not coincide with the adjacent parcel boundaries obtained from Skagit County; therefore, there is an overlap between the Property and BNSF parcels.
 AOC = area of concern.
 BNSF = Burlington Northern Santa Fe Railway.
 DRO = diesel-range organics.
 heavy oils = sum of DRO and ORO.
 ORO = oil-range organics.
 Property = North Cascade Ford Property.
 UST = underground storage tank.
 ZGA = Zipper Geo Associates.

Sources:
 Adjacent parcel boundaries obtained from Skagit County.
 Aerial photograph obtained from ArcGIS Online.
 Excavation extents surveyed by Pacific Geomatic Services, Inc. in March 2020.
 Property parcel boundaries surveyed by Wilson Engineering, LLC.

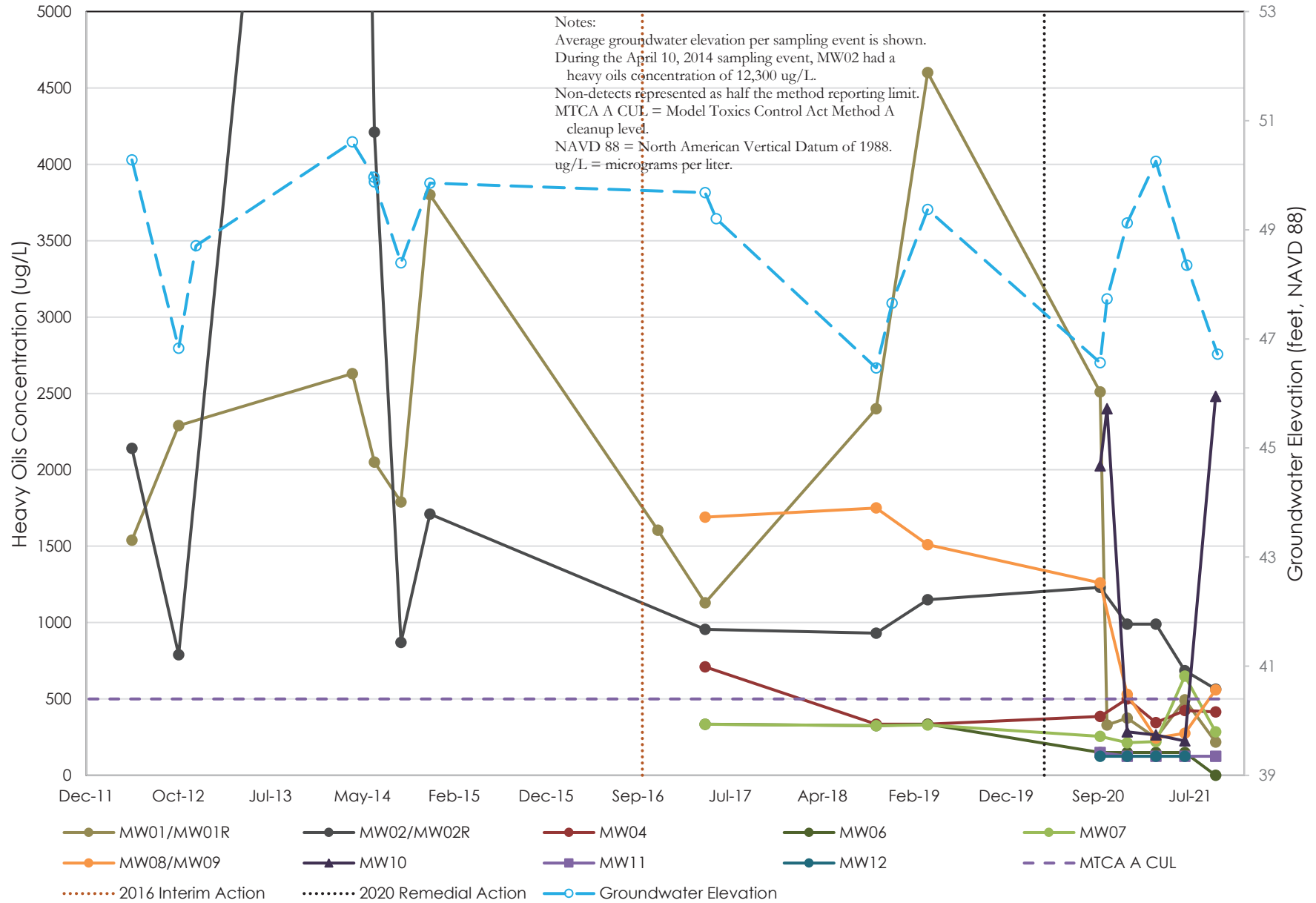


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Enclosure B, Figure 9

Figure 7
Heavy Oils Concentrations
North Cascade Ford Property



Enclosure B, Figure 10

Enclosure C

Basis for the Opinion: List of Documents

1. Maul Foster Alongi (MFA). Fifth Quarterly Compliance Groundwater Monitoring Event. November 11, 2021.
2. MFA. Fourth Quarterly Compliance Groundwater Monitoring Event. August 9, 2021.
3. MFA. Third Quarterly Compliance Groundwater Monitoring Event. April 8, 2021.
4. MFA. Second Quarterly Compliance Groundwater Monitoring Event. January 26, 2021.
5. MFA. Monitoring Well Installation and First Quarterly Compliance Groundwater Monitoring Event. November 24, 2020.
6. MFA. Addendum to Groundwater Compliance Monitoring Plan. August 10, 2020.
7. MFA. Remedial Action Completion Report. July 13, 2020.
8. MFA. Memorandum, Remedial Actions and Next Steps. July 8, 2020.
9. MFA. Quarterly Groundwater Monitoring Results March 2019. May 30, 2019.
10. MFA. Quarterly Groundwater Monitoring Results October and December 2018. April 11, 2019.
11. MFA. Feasibility Study Addendum. November 21, 2018.
12. MFA. Interim Remedial Action Completion Report. November 8, 2018.
13. Department of Ecology. Opinion on Proposed Remedial Action. April 20, 2016.
14. MFA. Data Gap Investigation Work Plan. December 9, 2015.
15. MFA. Preliminary Remedial Investigation and Feasibility Study. December 9, 2015.
16. Department of Ecology. Initial Investigation Field Report. June 8, 2012.
17. Whatcom Environmental. Phase II Environmental Site Assessment. March 14, 2012.