



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 11, 2022

Bryan Syrdal
Pine Lake Cleaners
2001 Western Avenue, Suite 330
Seattle, WA 98121
bsyrdal@mac.com

Re: Opinion on Proposed Cleanup of the following Site:

Site Name: Pine Lake Cleaners
Site Address: 2830 228th Ave SE Sammamish WA 98075
Cleanup Site ID: 15257
Facility/Site ID: 43185526
VCP Project ID: XN0013

Dear Bryan Syrdal:

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

Ecology has determined that upon completion of your proposed cleanup (implementation of vapor mitigation measures and institutional controls memorialized by an environmental covenant), no further remedial action will likely be necessary to clean up contamination at the Site.¹

- 1- No cleanup of contamination at the Site is currently proposed due the presence of a structure with ongoing business operations at the site. Cleanup of contamination would still be required in the future at such time that access to the contamination is no longer impeded.

This determination is dependent on yet-to be determined factors such as:

- Implementation of an environmental convent with long term monitoring requirements.

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

Releases of the dry cleaning solvent tetrachloroethene (PCE) and trichloroethene (TCE) into soil and potentially air occurred at the Site from historical dry cleaning operations. Although the dry cleaning operations is still there, they reportedly ceased using chlorinated solvents for both dry cleaning and spot cleaning in 2019.

The dry cleaners facility was located at 2830 228th Avenue SE in Sammamish, Washington. The facility is on King County parcel #1024069111, a 0.70 acre rectangular commercial property. The property has a one story shopping center structure which includes five other commercial operations. The property is surrounded by other commercial properties to the east and south, a single family residential area to the northeast, an apartment complex to the west across 228th Avenue SE, and a forested area to the north.

PCE was found in soil samples collected beneath the concrete slab at concentrations above MTCA cleanup levels to a depth of three feet below ground surface (ft bgs) in the vicinity of the dry cleaning and spot cleaning operations. Deeper soil sampling beneath the contaminated area was accomplished via angle drilling and the collection of soil samples at 16 and 20 feet below ground surface (ft bgs); however, no PCE or TCE were detected in these deeper soil samples.

Groundwater was estimated within the Remedial Investigation/Feasibility Study, and Cleanup Action Plan (RI/FS/CAP) Report¹ to be at a depth of at least 110 ft bgs, based on the occurrence of groundwater in eight (8) water well/boring locations in the area. At Ecology’s request, a temporary monitoring point was installed to the west and downslope of the dry cleaners. No groundwater was found in the temporary monitoring point, completed to a depth of 65 ft bgs. The soil data from beneath the dry cleaners, coupled with the lack of groundwater encountered to a depth of 65 ft bgs, indicated that impacts to groundwater from the release at this dry cleaners site is highly unlikely.

¹ Remedial Investigation/Feasibility Study and Cleanup Action Plan dated November 14, 2021

Sub-slab soil vapor and indoor air samples were collected to characterize risk from vapor intrusion. PCE and TCE were detected in sub-slab soil vapor samples at concentrations exceeding MTCA screening levels, with a maximum PCE concentration of 30,000 $\mu\text{g}/\text{m}^3$ and a maximum TCE concentration of 192 $\mu\text{g}/\text{m}^3$. The TCE in sub-slab vapors was attributed within the RI/FS/CAP Report² to the use of a TCE-based spot cleaner as opposed to dehalogenation of the PCE that was used for dry cleaning.

Three rounds of indoor air sampling resulted in detections of PCE at three locations and TCE at one location (for the first sampling round only in August 2020). The TCE was attributed within the RI/FS/CAP Report² to residual TCE within the structure from the spot cleaning activities, since the ratio of PCE in sub-slab vapor to indoor air was much higher than the ratio of TCE in sub-slab vapor to indoor air. The maximum PCE concentration in indoor air of 7.9 $\mu\text{g}/\text{m}^3$ was slightly below the unrestricted land use-based cleanup level of 9.6 $\mu\text{g}/\text{m}^3$, but well below the commercial land use-based cleanup level of 34 $\mu\text{g}/\text{m}^3$. Proposed continued indoor air monitoring is necessary to potentially confirm or refute the hypothesis that the one TCE detection was unrelated to sub-slab soil vapors (no continued detections of TCE in indoor air should occur).

Cleanup of the contaminated soil beneath the dry cleaners is reportedly not practicable at this time because of the structure and ongoing business operations preventing access to the contamination. Hence, vapor intrusion mitigation measures and continued indoor air monitoring is proposed within the RI/FS/CAP² to ensure that no exposure to PCE and TCE in indoor air is occurring. An indoor air monitoring plan should be submitted to Ecology for review and comment, including proposed monitoring locations and frequencies, and sampling and analysis methods.

Ecology should be notified immediately if any indoor air cleanup level exceedances occur. Sub-slab depressurization is proposed within the RI/FS/CAP as a contingency mitigation measure in case indoor air sampling indicates contamination above cleanup levels in indoor air.

An Environmental Covenant (EC) will need to be recorded with the county. This EC will require continued indoor air monitoring consistent with the indoor air monitoring plan, to demonstrate that occupants are protected, and cleanup of the contaminated soil once the structure is no longer present. Should access to the contaminated soils become an option due to cessation of current business operations, Ecology would cleanup actions to address the contaminated soil rather than awaiting the removal of the structure.

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:

² Remedial Investigation/Feasibility Study and Cleanup Action Plan dated November 14, 2021

- Tetrachloroethene (PCE) and trichloroethene (TCE) into the soil and potentially 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. At this time, Ecology has no information suggesting that the parcel associated with this Site may be affected by another site.

Basis for the Opinion

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

1. Urban Environmental Partners. *Focused Phase II Assessment Report, Pine Lake Dry Cleaners Facility*. October 30, 2018.
2. Urban Environmental Partners. *Remedial Investigation/Feasibility Study and Cleanup Action Plan, Pine Lake Cleaners*. November 14, 2021.

A number of these documents are accessible in electronic form from the Site webpage <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=15257>. 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. The Site is described above and in **Enclosure A**.

Site Contaminants

Site contaminants found above MTCA cleanup levels in soil and potentially air include PCE and TCE.

Soil Characterization

The extent of soil contamination appears to be sufficiently defined for the selection of cleanup levels and cleanup actions at the Site. A total of 17 soil samples were collected from nine (9) locations, at depths ranging from one (1) to 20 ft bgs in 2018 and 2021. The deepest detection of Site contaminants was at three (3) ft bgs. Deeper soil sampling via angle drilling beneath the existing structure at depths of 16 and 20 ft bgs did not indicate the presence of site contaminants above detection limits.

Groundwater Characterization

Groundwater was estimated within the RI/FS/CAP Report to be at a depth of at least 110 ft bgs, based on the occurrence of groundwater in eight (8) water well/boring locations in the area. At Ecology's request, a temporary monitoring point was installed to the west and downslope of the dry cleaners. No groundwater was found in the temporary monitoring point to a depth of 65 ft bgs. A two (2) inch thick seam of wet soil was found at 12 ft bgs. A soil sample was collected from this potentially saturated interval and no contaminants were detected. The soil data from beneath the dry cleaners coupled with the lack of groundwater encountered to a depth of 65 ft bgs indicated that impacts to groundwater from the release at this dry cleaners site is highly unlikely.

Soil Vapor Characterization

Soil vapor was characterized first through a passive soil gas survey in 2018 followed by collection of 27 soil vapor samples from 22 locations between 2018 and 2021. PCE and TCE were detected in sub-slab soil vapor samples at concentrations exceeding MTCA screening levels, with a maximum PCE concentration of 30,000 $\mu\text{g}/\text{m}^3$ and a maximum TCE concentration of 192 $\mu\text{g}/\text{m}^3$. The TCE in sub-slab vapors was attributed within the RI Report to the use of a TCE-based spot cleaner as opposed to dehalogenation of the PCE that was used for dry cleaning.

Indoor Air Characterization

Indoor air was characterized by collection of 15 indoor air samples from five (5) locations in 2020 and 2021. The TCE was attributed within the RI Report to residual TCE within the structure from the spot cleaning activities, since the ratio of PCE in sub-slab vapor to indoor air was much higher than the ratio of TCE in sub-slab vapor to indoor air. The maximum PCE concentration in indoor air of 7.9 $\mu\text{g}/\text{m}^3$ was slightly below the unrestricted land use-based cleanup level of 9.6 $\mu\text{g}/\text{m}^3$, but well below the commercial land use-based cleanup level of 34 $\mu\text{g}/\text{m}^3$. Proposed continued indoor air monitoring is required to potentially confirm or refute the hypothesis that the one TCE detection was unrelated to sub-slab soil vapors (no continued detections of TCE in indoor air should occur).

2. Establishment of cleanup standards and points of compliance.

Cleanup Standards

Ecology has determined the cleanup levels and points of compliance presented below meet the substantive requirements of MTCA. The following cleanup levels have been selected for the Site:

Contaminant	Method A Soil Cleanup Level (mg/kg)	Method A Groundwater Cleanup Level (µg/L)	Indoor Air Cleanup Level (µg/m ³)
PCE	0.05 ¹	5 ¹	9.6 ² , 34 ⁴
TCE	0.03 ¹	5 ¹	0.33 ⁵

- 1 – Method A cleanup level.
- 2 – Method B cleanup level, cancer, unrestricted land use.
- 3 – Method B cleanup level, non-cancer, unrestricted land use.
- 4 – Method B cleanup level, cancer, commercial land use.
- 5 – Method B early life exposure, unrestricted land use.

The selected cleanup levels are all for unrestricted land use except for the cleanup level for PCE in indoor air of 34 µg/m³, which is based on a commercial scenario.

Points of Compliance

As discussed above, the points of compliance are throughout the Site. The Method A cleanup levels for soil are based on the soil-to-groundwater pathway and thus apply without consideration to depth.

Terrestrial Ecological Evaluation (TEE)

The Site has significant forested open space to the north, therefore TEE process cannot be ended based on completion of MTCA Table 749-1. However, exposure by ecological receptors to contaminated soil is not viable since contamination is all located beneath the concrete slab of the shopping center structure. Should the structure be removed in the future, then the TEE pathway could apply; however, cleanup of all soil contamination will be expected once the structure is no longer present.

3. Selection of cleanup action.

Ecology has determined the vapor intrusion vapor mitigation measures you proposed for the Site meets the substantive requirements of MTCA.

Cleanup of the contaminated soil beneath the dry cleaners is reportedly not practicable at this time because of the structure and ongoing business operations preventing access to the contamination. Hence, vapor intrusion mitigation measures and continued indoor air monitoring is proposed within the RI/FS/CAP³ to ensure that no exposure to PCE and TCE in indoor air is occurring.

Two elements of the proposed vapor intrusion mitigation 1) a physical barrier to prevent direct contact and vapor intrusion and 2) inspection of the barrier (concrete floor slab) and repairs as needed.

Physical Barrier to Prevent Direct Contact and Vapor Intrusion

The CAP³ states that the continuous (e.g., no expansion joints), existing 6-inch thick concrete floor slab, is considered an engineering control for the Site and will be maintained at all times.

Inspection of the Barrier (Concrete Floor Slab) and Repairs as Needed

The following language regarding inspection of the barrier and repairs was provided within the CAP³:

With the existing concrete floor slab in place, inspection of its continued presence and satisfactory condition of the barrier will be performed annually. The first two inspections will be performed by the property owner, the cleaner owner and operator, and a qualified environmental professional. After two years, the inspection will be performed by the cleaner's owner and operator and results shared with the property owner immediately. An inspection form (included as an appendix to the Work Plan) will be filled out by the inspection team and include sufficient photos to document the condition of the barrier. The purpose of the inspection will be to ensure there is continued integrity of the concrete floor slab, and therefore continued effective functioning of the barrier.

The visual inspection shall be performed with adequate lighting (bring a construction flood light if necessary) and made from within three to four feet distance from the surface of the concrete (i.e., close range). The inspection shall make note of any cracks, discolorations or moisture (including penetrating seeps) on the concrete surface. All discovered cracks in the floor shall be immediately sealed using a chemical-resistant, epoxy-based concrete sealer, such as Sitka-Pro™.

³ Remedial Investigation/Feasibility Study and Cleanup Action Plan dated November 14, 2021.

Results of the inspection shall be documented and reported to Ecology every 5 years along with indoor air monitoring results. If a floor crack is discovered, this information shall be reported to Ecology immediately after the discovery and repair.

Ecology notes that during inspections special attention should be given to any utility penetrations of the concrete slab.

Contingency Measures

Sub-slab depressurization is proposed as a contingency measure in case indoor air sampling indicates contaminations above cleanup levels in indoor air (IA). The following are sequential steps for implementation of contingency measures proposed within the RI/FS/CAP:³

- 1. Reinspect the concrete floor surfaces and inventory the space. Note any changes during this inspection. Repair or replace any noted concerns, such as a crack in the wall or storage of new chemicals in the space. Consider an epoxy coating (10-mil dry film thickness) on the concrete floors or walls.*
- 2. Perform additional rounds of IA sampling in accordance with the CMP. If the IA results are above the CULs, then continue with:*
- 3. Design and install a sub-slab depressurization system on the east side of the cleaner. These depressurization systems are available 'off-the-shelf' and provided by local vendors at a cost range of \$50k to \$100k for 2 to 4 floor penetrations.*
- 4. Perform 2 rounds (separate events) of IA sampling in accordance with this sampling plan. If the IA results are both above the CULs, then meet with Ecology to develop a plan for additional site characterization (identify what has changed) and possible mitigation measures.*

Environmental Covenant

The proposed approach includes the recording of an EC with the county that requires cleanup of the contaminated soil once the structure is no longer present and continued indoor air monitoring to demonstrate that occupants are protected.

The EC is expected to include (but not be limited to) the following provisions:

- A prohibition on installation of water supply wells on the Property.
- A requirement that remaining contamination beneath the structure will be cleaned up in the future, once the structure is no longer present.
- Continued indoor air monitoring requirements.

Additional EC reference information is provided in **Enclosure B**. Should access to the contamination become available due to cessation of business operations, Ecology would encourage cleanup actions to address the contaminated soil rather than awaiting removal of the Site structure.

Continued Indoor Air Monitoring

An indoor air monitoring plan should be submitted to Ecology for review and comment including proposed monitoring locations and frequencies, and sampling and analysis methods. The EC will attach the indoor air monitoring plan after concurrence from Ecology has been achieved.

Ecology should be notified immediately of any indoor air cleanup level exceedances. Ecology notes that continued indoor air sampling should target time periods with the greatest potential vapor intrusion risk, including when sub-slab to indoor air pressure gradients are present.

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 ⁴.

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

fpw: anf

Enclosures (2): A – Site Description and Diagrams
B – Environmental Covenant Reference Information

cc: John Funderburk, Urban Environmental Partners LLC
Roy Kuroiwa, Urban Environmental Partners LLC

⁴ <https://www.ecy.wa.gov/vcp>

Enclosure A

Site Description and Diagrams

Site Description

Site: The Site is defined by PCE and TCE in soil and potentially air. The Site is associated with releases from a former dry cleaners located at 2830 228th Avenue SE Sammamish, Washington.

Area and Property Description: The dry cleaners facility was located at 2830 228th Avenue SE in Sammamish, Washington. The facility is on King County parcel #1024069111, a 0.70 acre rectangular commercial property. The Property has a one story shopping center structure which includes five other commercial operations. The Property is surrounded by other commercial properties to the east and south, a single family residential area to the northeast, an apartment complex to the west across 228th Avenue SE, and a forested area to the north.

Site History: The dry cleaning business has operated from 1990, when the shopping center structure was constructed to present. The use of PCE as a dry cleaning solvent and TCE for spot cleaning was reportedly discontinued in 2019.

Other commercial tenants are present within the shopping center; however, no indications of contamination concerns at these other facilities has been identified by Ecology during our review of the Site.

Sources of Contamination: Releases of the dry cleaning solvent PCE to soil occurred from the former dry cleaning operation and releases of TCE reportedly likely occurred due to the former use of a TCE-containing spot remover. As discussed above, the use of PCE and TCE at the Site was reportedly discontinued in 2019.

Physiographic Setting: The Site is located in Sammamish, Washington, approximately 1,360 feet east of Pine Lake, an approximately 75 acre lake. The Site is in an area of undulating glacial terrain within the Puget Lowland Physiographic Province. The Site is at an elevation of approximately 435 feet above mean sea level (ft amsl). The area surrounding the Site slopes to the west and north, with 228th Avenue SE located at an elevation approximately ten (10) feet lower than the dry cleaners.

Surface/Storm Water: Pine Lake is the nearest mapped surface water body to the Site. Stormwater at the Site is expected to generally flow to the north and west. Approximately 300 feet north of the Site a drainage feature flows to the northeast to a low area, mapped as a wetland, located approximately 1,300 Feet northeast of the Site.

Ecological Setting: The Site has significant forested open space to the north, therefore TEE process cannot be ended based on completion of MTCA Table 749-1. However, exposure by ecological receptors to contaminated soil is not viable since contamination is all located beneath the concrete slab of the shopping center structure.

Should the structure be removed in the future, then the TEE pathway could apply; however, cleanup of all soil contamination will be expected once the structure is no longer present.

Geology: The following geological description is from the RI/FS/CAP report:

The Geologic Map of King County (Booth et al. 2007) indicates that the Property is underlain by approximately 120 feet of Vashon till. These glacially compacted deposits consist of a very dense mixture of silt, sand, gravel, and clay, which typically are characterized by relatively low vertical hydraulic conductivity. The Property is in the Sammamish glacial plateau, which is also characterized by glacial deposits of silts and sands and Vashon drift deposits including compacted sand, silt, and gravel (Vashon glacial till).

Underlying the Vashon glacial till is the Vashon advance outwash characterized by well sorted, well-stratified sandy pebble to cobble gravel. The building and concrete slab were constructed with a sandy silt subbase (reworked local till) that is approximately 2 to 3 feet thick.

Groundwater: Groundwater at the Site was estimated within the RI/FS/CAP report at a depth of greater than 110 feet, based on water levels reported in eight (8) water supply well/boring logs in the area. Other than 2-inch seam of apparent saturation, no potential groundwater conditions were encountered to a depth of 65 ft bgs at the Site. Ecology notes that Pine Lake (located 1,200 feet west of the Site) is at an elevation approximately 54 feet below the elevation of the Site. However, the thick and highly compacted nature of the Vashon till in this area may mean that there is a lack of regional interconnectivity between groundwater and Pine Lake.

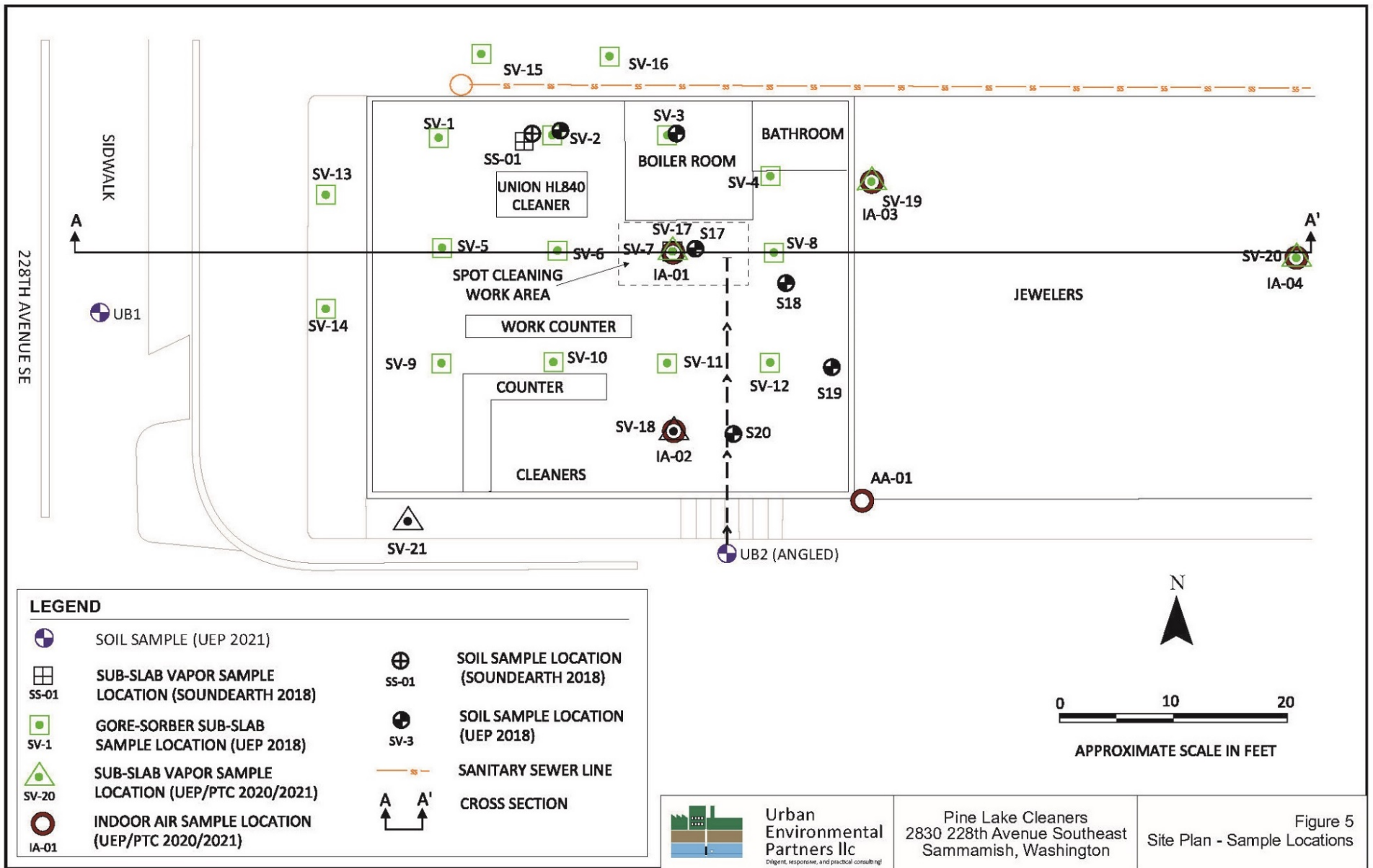
Water Supply: Potable water is provided to the Property by the City of Sammamish. The nearest Group A/B wells are located approximately 1,000 feet to the northwest and southwest of the Site. The nearest wellhead protection zones is located approximately 3,600 feet east-southeast of the Site. Risks to water supply wells from the Site are unlikely.

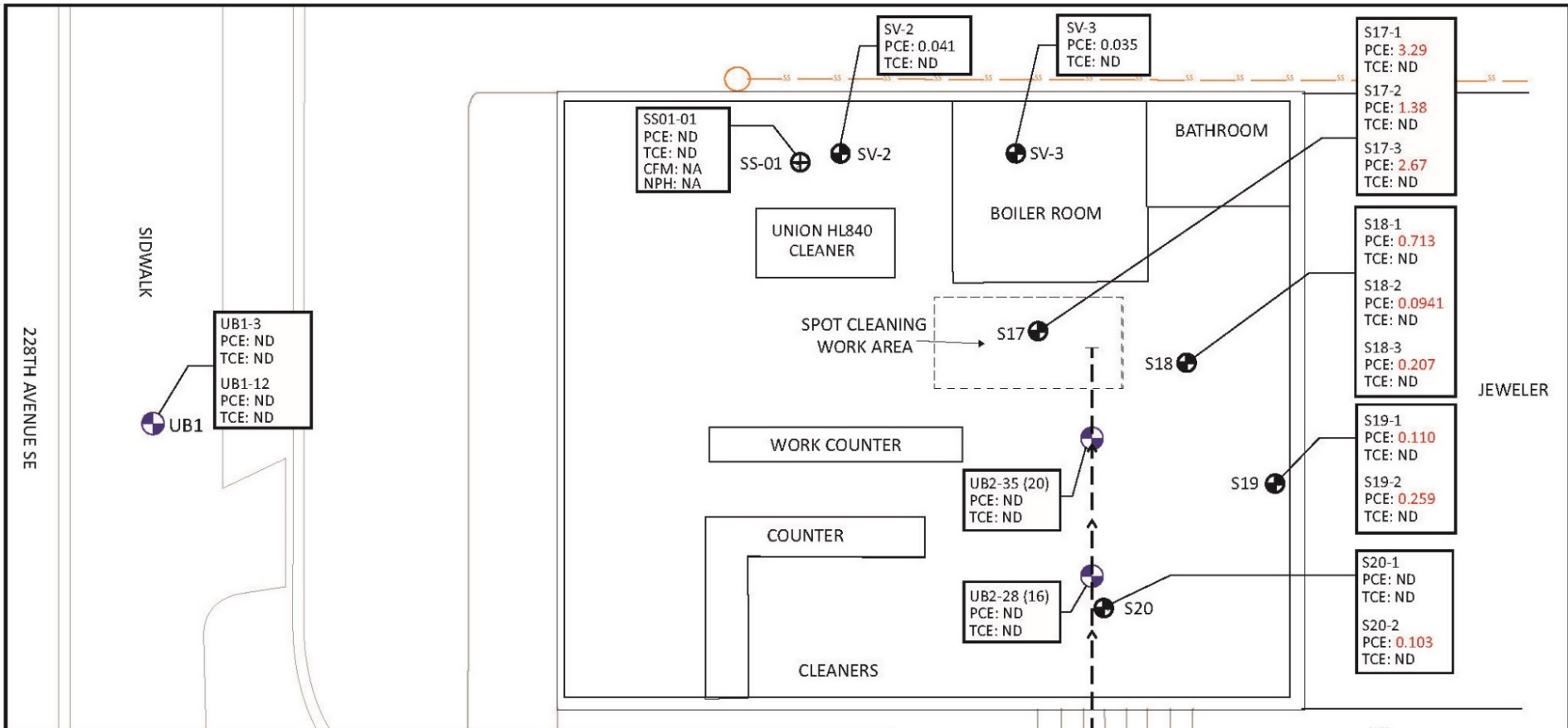
Extent of Contamination: The extent of soil and soil vapor contamination has been generally defined through investigations conducted at the Site between 2018 and 2021. The extent of soil and soil vapor contamination has been sufficiently defined to identify cleanup levels and proposed cleanup actions discussed herein.

The maximum vertical extent of soil contamination appears to be between three (3) and 16 ft bgs (the upper depth determined via hand auguring and the lower depth determined via angle drilling). A more refined vertical depth of contamination does not appear to be achievable at this time due to the hard nature of the till materials and the inability of drilling equipment to access the area of contamination.

The lateral extent of soil and soil vapor contamination appears to be largely confined to within the building footprint. In the future, when the structure is no longer present and the soil contamination can be cleaned up, both the vertical and lateral extent of contamination will need to be confirmed. This could be done via confirmation removal of contaminated soil.

Site Diagrams

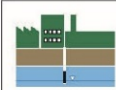
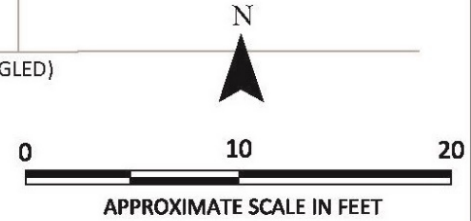




LEGEND

- UB1 SOIL SAMPLE (UEP 2021)
 - SS-01 SOIL SAMPLE LOCATION (SOUNDEARTH 2018)
 - SV-3 SOIL SAMPLE LOCATION (UEP 2018)
 - SANITARY SEWER LINE
- PCE: TETRACHLOROETHYLENE
 TCE: TRICHLOROETHYLENE
 ND: NON-DETECT (ALL LABORATORY NON-DETECT REPORTING LIMITS ARE LESS THAN APPLICABLE SCREENING OR CLEANUP LEVELS.)
 NA: NOT ANALYZED
 RED DENOTES COMPOUND EXCEEDS APPLICABLE CLEANUP LEVELS FOR UNRESTRICTED LAND USE. SAMPLE CONCENTRATIONS PRESENTED IN MILLIGRAMS PER KILOGRAM (MG/KG)

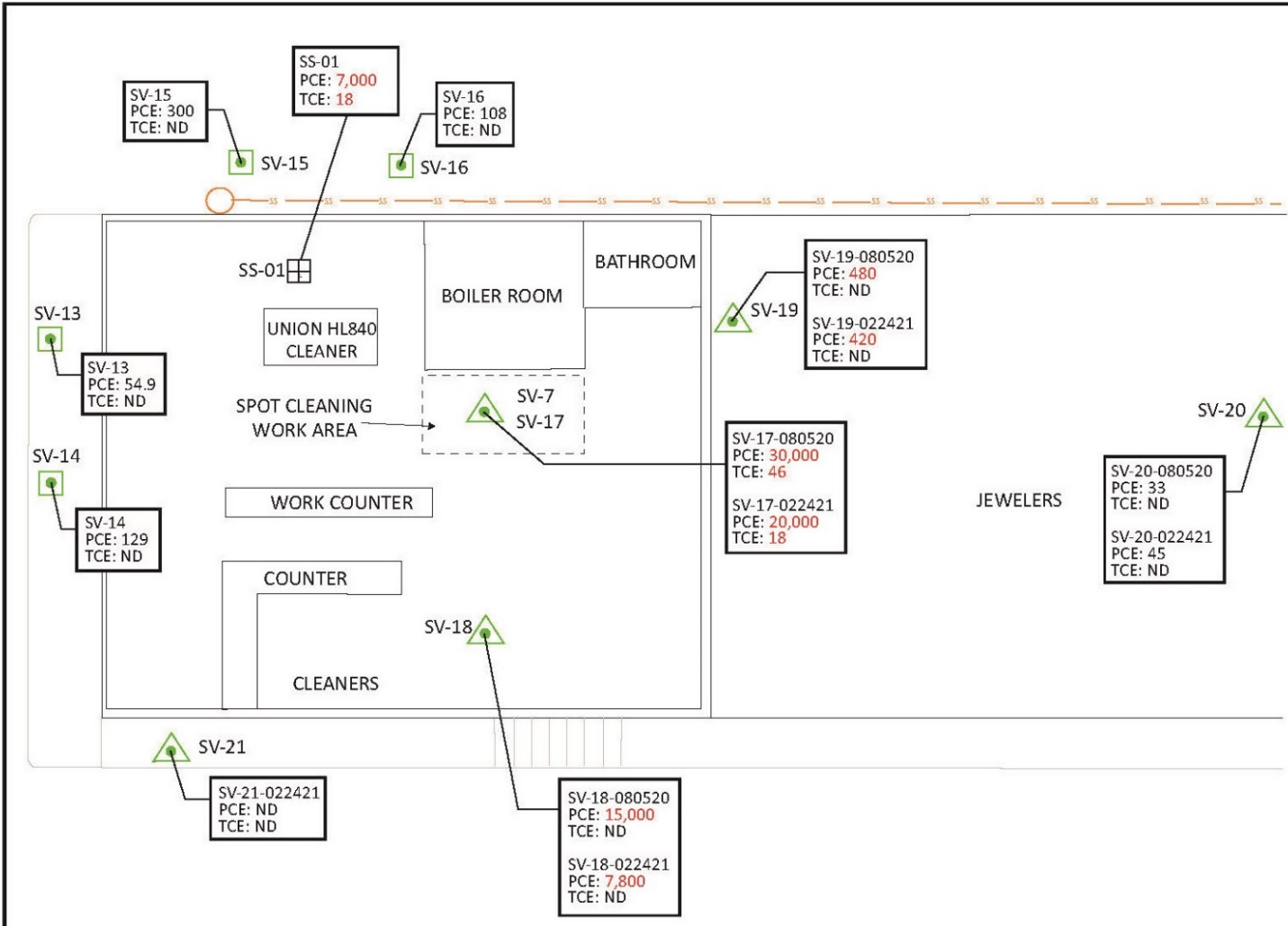
	PCE	TCE
MTCA METHOD A CLEANUP LEVELS (MG/KG)	0.05	0.03
MTCA METHOD B CLEANUP LEVELS (MG/KG)	480	12



Urban Environmental Partners llc
 Diligent, responsive, and practical consulting!

Pine Lake Cleaners
 2830 228th Avenue Southeast
 Sammamish, Washington

Figure 9
 Soil Sampling Results

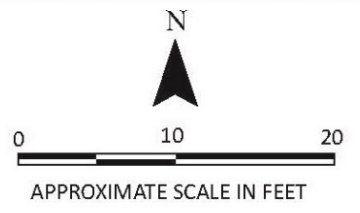


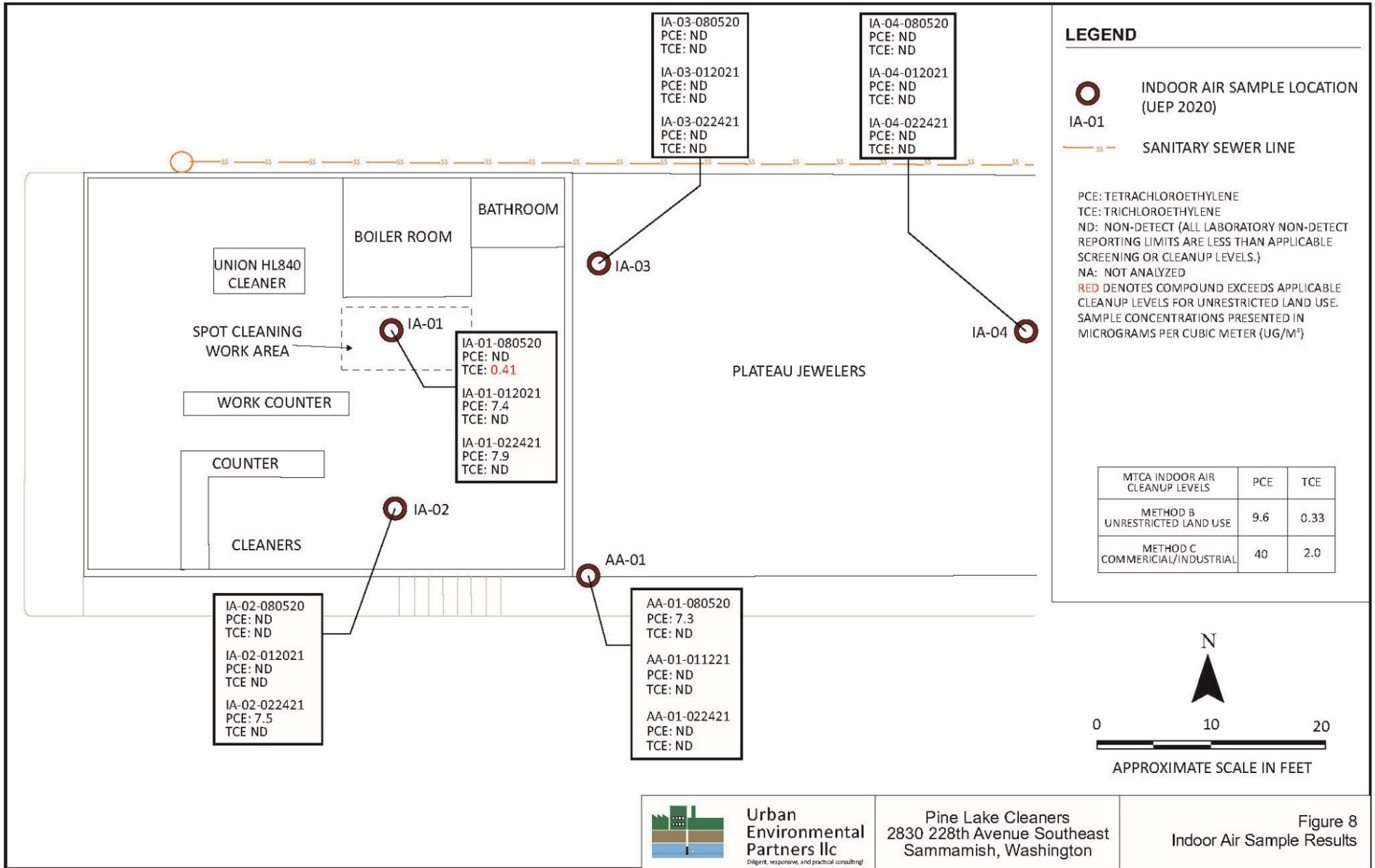
LEGEND

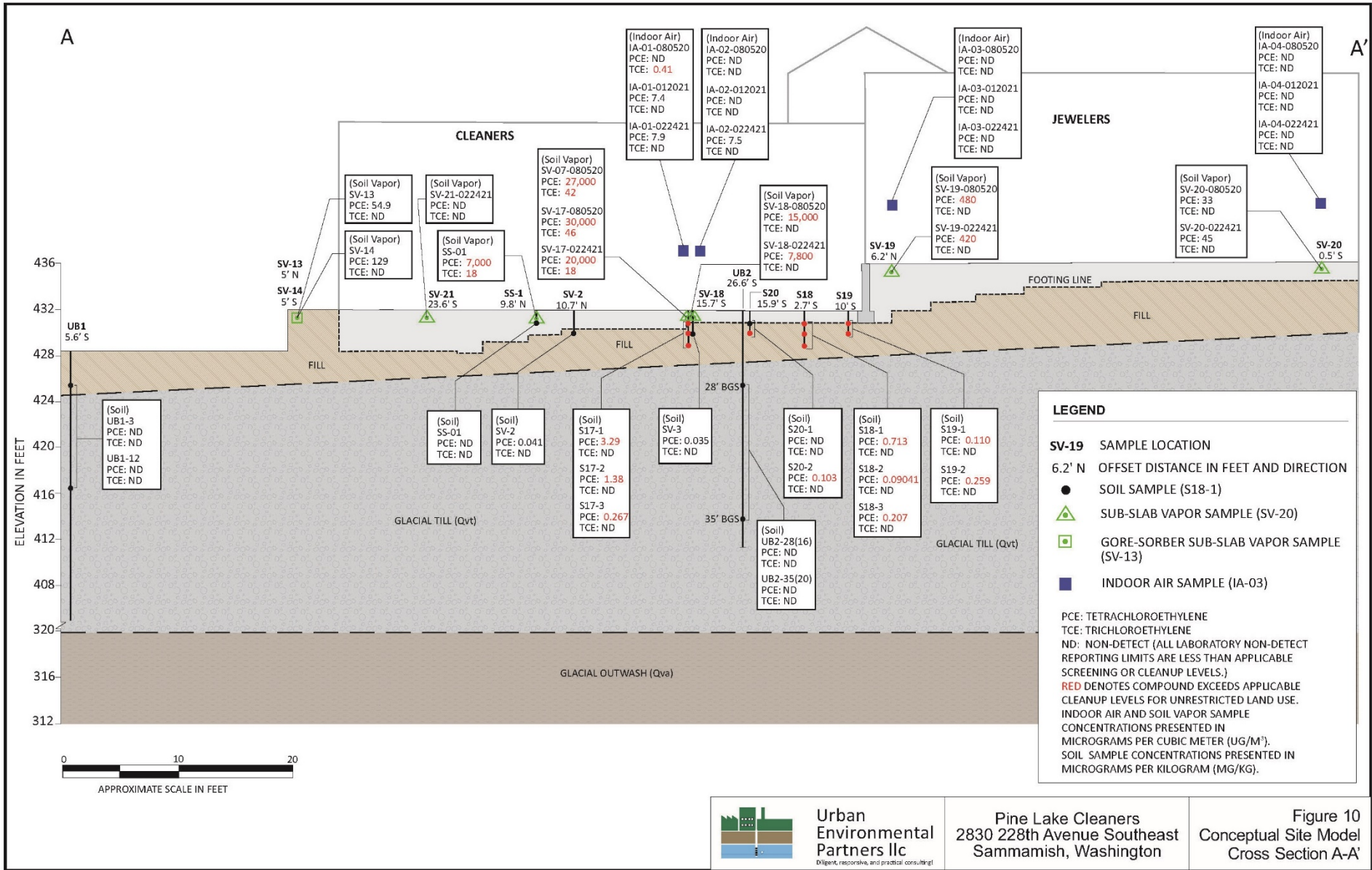
- SUB-SLAB VAPOR SAMPLE LOCATION (SOUNDEARTH 2018)
SS-01
- GORE-SORBER SUB-SLAB SAMPLE LOCATION (UEP 2018)
SV-1
- SUB-SLAB VAPOR SAMPLE LOCATION (UEP 2020)
SV-20
- SANITARY SEWER LINE

PCE: TETRACHLOROETHYLENE
 TCE: TRICHLOROETHYLENE
 ND: NON-DETECT (ALL LABORATORY NON-DETECT REPORTING LIMITS ARE LESS THAN APPLICABLE SCREENING OR CLEANUP LEVELS.)
 NA: NOT ANALYZED
 RED DENOTES COMPOUND EXCEEDS APPLICABLE CLEANUP LEVELS FOR UNRESTRICTED LAND USE. SAMPLE CONCENTRATIONS PRESENTED IN MICROGRAMS PER CUBIC METER (UG/M³).

MTCA SUB SLAB SOIL GAS SCREENING LEVELS	PCE	TCE
METHOD B UNRESTRICTED LAND USE	320	11
METHOD C COMMERCIAL/INDUSTRIAL	1,300	67







Enclosure B

Environmental Covenant Reference Information

Enclosure B

Environmental Covenant Reference Information

Draft Covenant: A draft covenant memorializing proposed institutional and engineered controls for the impacted property(s) will be needed. The following information will be needed within the draft covenant:

- a. **Plan View Map(s):** Include a plan view map(s) showing the extent of contamination above Model Toxics Control Act (MTCA) cleanup levels. Include the boundaries of the MTCA facility, the affected Properties, and the location of any rights of way or easements. These maps will be used to indicate where contamination remains at the Site after closure. For consistency with other sites in our program, Ecology prefers that data for these maps are provided in units of milligrams per kilogram (mg/kg) for soil, micrograms per liter ($\mu\text{g/L}$) for groundwater, and microgram per meter cubed ($\mu\text{g/m}^3$) for air and soil vapor.
- b. **Title Search:** Provide a complete title search for the impacted property(s).
- c. **Legal Description:** Provide a complete legal description of the impacted property(s).
- d. **Land Survey:** If the environmental covenant restrictions are intended to cover only the areas of contamination within the impacted property(s) and not the entire impacted property(s), provide a land survey of the contaminated area, including rights-of-way, platting and dedications.
- e. **Local Government Notification Requirements:** Local government notification requirements of WAC 173-340-440(10) are detailed within the instructions of Ecology's EC boilerplate document.