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March 15, 2022

Hank Jacky
CHJ Properties
8215 15th Avenue NE
Seattle, WA 98115
(hankjacky@yahoo.com)

Re: Opinion on Proposed Cleanup of the following Site:

- **Site Name:** Suns Mini Mart & Gas
- **Site Address:** 9506 19th Avenue SE, Everett, WA 98208
- **Facility/Site No.:** 56571915
- **VCP Project No.:** NW3317
- **Cleanup Site No.**: 12382

Dear Hank Jacky:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Suns Mini Mart & Gas 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.

Issue Presented and Opinion

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

YES. Ecology has determined that, upon completion of your proposed cleanup, further remedial action will likely be necessary to clean up contamination at the Site.

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

Description of the Site

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

- Gasoline-range petroleum hydrocarbons (TPHg), benzene, toluene, ethylbenzene, xylenes (BTEX), and

naphthalene into the Soil.
- TPHg, BTEX, and naphthalene into the Groundwater.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology. The Site is located on one Snohomish County tax parcel 28051800401700, with address 9506 19th Avenue SE in Everett (Property). The Site consists of the Property, and potentially the right-of-way (ROW) east of the Property. The Site boundary has not been fully delineated.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the documents listed in **Enclosure B**. A number of these documents are accessible in electronic form from the Site webpage[1]. The complete records are stored 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

Ecology has concluded that, upon completion of your proposed cleanup, **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 not sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A.**

a. Soil contamination characterization.

The Site is contaminated with petroleum hydrocarbons that are sourced from the historic operations of former gasoline service stations from 1971 to 2013. The contaminants of concern (COCs) identified to date included TPHg, BTEX, and naphthalene.

Contaminated soil is confirmed in areas of former gasoline service station facilities, including former underground storage tanks (UST), dispenser islands, and product lines. Contaminated soil is also confirmed east and northeast of the former gas station facilities, and may have extended off-Property to the east. The lateral extent of the soil contamination is not defined

[1] https://apps.ecology.wa.gov/cleanupsearch/site/12382
[2] https://ecology.wa.gov/Footer/Public-records-requests

to the east, northeast, south, and west.

Contaminated soil is confirmed a depth of 40 feet below ground surface (bgs) in the former UST area (GL-B-15), east of the former UST area (GL-B-13), and north of the dispenser area (GL-B-9/GMW-2); see **Enclosure A, Figure 3**. Contaminated soil is confirmed at a depth of 10 feet bgs in the former dispenser island area (GL-B-2 and GL-B-6). The vertical extents of the soil contamination in these areas are not defined.

Additional soil sampling are needed to define the lateral and vertical extent of the soil contamination.

b. Groundwater contamination characterization.

Four groundwater monitoring wells (GMW-1 through GMW-4) were installed on Site. COC concentrations exceeded the MTCA Method A groundwater cleanup levels in the groundwater samples collected from monitoring wells GMW-2 through GMW-4, as well as soil borings B-4, GL-B-10 and GL-B-12. The lateral extent of the groundwater plume is not delineated to the east, northeast, south, and west. The groundwater plume may have extended off-Property to the east.

Light non-aqueous phase liquid (LNAPL) was detected in monitoring well GMW-4 in March 2016. LNAPL may be present in the former UST area and the product line trench, where a historical spill of petroleum product was reported. The extent of the potential LNAPL plume is not delineated.

Additional monitoring wells are needed to delineate the extent of the contaminated groundwater plume and potential LNAPL plume.

- Ecology recommends additional monitoring wells in the following areas of the Site:
    - Monitoring wells north, west, and east/northeast of monitoring well GMW-4 and soil boring B-4, to evaluate and delineate the groundwater plume and potential LNAPL plume in the former gasoline UST area and product trench area.
    - Monitoring wells east and northeast of monitoring well GMW-3 and soil boring GL-B-10, to delineate the eastern and northeastern extent of the groundwater plume.
    - Monitoring wells north of monitoring well GMW-2 to delineate the northern extent of the groundwater plume.
    - Monitoring wells south of the former UST area to delineate the southern extent of the groundwater plume.
    - At least one monitoring well on the southwestern portion of the Site to evaluate the groundwater condition in the former waste oil UST area.

- Please construct new monitoring wells so the seasonal high groundwater table is not above the top of the well screens.

  Please note that the current well screens in existing monitoring wells GMW-1, GMW-2, and GMW-4 are submerged under the groundwater table; groundwater samples collected from these monitoring wells may not provide representative groundwater quality data.

- All monitoring wells, including the existing monitoring wells and the newly-installed monitoring wells, should be surveyed to North American Vertical Datum of 1988 (NAVD 88) instead of an arbitrary datum.

c. **Site hydrogeology characterization.**

Site subsurface soil consists of glacial till (Qvt), underlain by advance outwash (Qva). All existing monitoring wells are installed on the eastern portion of the Property. Field observation suggested groundwater is perched in water-bearing zones within the glacial till. The perched groundwater depths along the eastern Property boundary (well GMW-3 and boring GLB-10) appear to be approximately 10 to 25 feet deeper than those in other monitoring wells and soil borings.

No monitoring well is installed on the western portion of the Property. The underlying glacial outwash outcrops along the Wood Creek slope immediately west of the Property, at elevations of approximately 440 to 450 feet above mean sea level (amsl), or 20 to 30 feet below Property ground surface. Groundwater on the western portion of the Property may be present within the glacial outwash.

Additional soil boring and monitoring well installation, and groundwater monitoring is needed to characterize Site hydrogeology.

- Obtain geological information throughout the Site, and evaluate how it impacts presence of groundwater.
- Evaluate groundwater depths throughout the Site, either in glacial till or the glacial outwash.
- Assess the continuity of perched groundwater and the underlying water table, and determine if they are separate hydrogeologic units.
- Determine the predominant flow directions and seasonal variations of groundwater at the Site.

d. Vapor intrusion (VI) evaluation.

Please refer to Appendix B, Table B-1 of *Draft Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action, Publication Number 09-09-047, Revised*

November 2021[3]. The following soil samples were collected within the lateral inclusion zone of 30 feet and vertical separation depth of 15 feet from the Site building, and contained TPHg concentrations above the vapor intrusion threshold of 250 milligrams per kilogram (mg/kg) for weathered gasoline and weathered diesel:

- Sample B-9 at 6 feet bgs, with a TPHg concentration of 6,400 mg/kg;
- Sample GL-B-2 at 7.5 and 10 feet bgs, with TPHg concentrations of 794 and 298 mg/kg, respectively;
- Sample GL-B-4 at 10 feet bgs, with a TPHg concentration of 2,740 mg/kg;
- Sample GL-B-6 at 10 feet bgs, with a TPHg concentration of 3,240 mg/kg; and
- Sample GL-B-9 (GMW-2) at 7.5 feet bgs, with a TPHg concentration of 490 mg/kg.

In addition, LNAPL was detected in monitoring well GMW-4 in March 2016. Monitoring well GMW-4 is located approximately 25 feet southeast of the building, within the lateral inclusion zone.

A Tier 1 VI evaluation is needed for the Site building. The Tier 1 VI evaluation could include additional shallow groundwater and/or soil gas sampling.

For additional information regarding vapor intrusion evaluation, please refer to the previously cited Ecology VI draft guidance document.

e. Additional analysis for waste oil UST.

Selected soil and groundwater samples collected from the former waste oil UST area should be analyzed for required testing for waste oil, in accordance with WAC 173-340-900, Table 830-1.

Please note, soil samples from the former waste oil UST area were analyzed in 1992 for volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs). All concentrations were below the applicable cleanup levels.

Therefore, future selected soil samples from the former waste oil UST area should be at least tested once for the following:

- TPHg;
- Diesel- and heavy-oil range petroleum hydrocarbons (TPHd and TPHo);
- BTEX;
- Naphthalene;
- Carcinogenic polycyclic aromatic hydrocarbons (cPAHs); and
- Lead.

Future selected groundwater samples from the former waste oil UST area should be at least tested once for the following:

[3] https://apps.ecology.wa.gov/publications/SummaryPages/0909047.html

- TPHg, TPHd, and TPHo;
- Full list of VOCs;
- Naphthalene and cPAHs; and
- Lead.

f. Site cleanup or Property-specific cleanup.

In the *Response to Comments to TRC Memorandum dated June 16, 2021,* dated October 8, 2021, it was stated that the objective of the planned remedial action is to remediate contamination within the Property boundary in pursuit of a Property No Further Action (NFA). However, this objective is not stated in the *Cleanup Action Plan*, dated April 27, 2021 (*April 2021 CAP*). Please clarify if you are conducting a Property-specific cleanup.

- For Property-specific cleanup, please refer to *Guidelines for Property Cleanups under the Voluntary Cleanup Program, Ecology Publication Number 08-09-044,* Revised July 2015[4] *(Property Cleanup Guidelines)*.

- If conducting a Property-specific cleanup, the Property should include the tax parcel 28051800401700, and the ROW easements on the tax parcel, except under certain conditions stated in Section 3.5.2 of the *Property Cleanup Guidelines*.

- If conducting a Property-specific cleanup, sufficient Site characterization is still needed to establish cleanup standards for the Site, and select appropriate cleanup for the Property. A complete remedial investigation (RI) per MTCA requirements is therefore needed.

g. Reports and additional data submittal.

- A comprehensive report, such as a RI report or equivalent, is needed to summarize Site characterization data. At a minimum, summary tables and figures documenting all sampling locations and results to date should be included in the future deliverable. The vertical scale of the cross-sections should be referenced to NAVD88. Groundwater contour maps and a Rose Diagram are needed to document groundwater flow directions and seasonal variations. See the RI Checklist[5] for guidance on RI report contents.

- A completed terrestrial ecological evaluation (TEE) form is needed for Ecology's review.

  Section 6.5 of the *April 2021 CAP* stated that, the exposure pathway to terrestrial ecological receptors is not complete because the contamination is covered by pavement and buildings. However, to qualify for this exclusion, an institutional control such as an Environmental Covenant (EC) is required per WAC 173-340-7491(1)(b). Before an EC is established, this exclusion does not apply for the Site. Instead, the Site may qualify for an

[4] https://apps.ecology.wa.gov/publications/SummaryPages/0809044.html
[5] https://apps.ecology.wa.gov/publications/SummaryPages/1609006.html

exclusion per WAC 173-340-7491(1)(c)(i). There appears to be less than 1.5 acres of contiguous undeveloped land on or within 500 feet of the Site. Please complete the TEE form with the appropriate exclusion and supporting documentation.

- Please submit all sampling data collected in and post-2005 into Ecology's electronic Environmental Information Management (EIM) database. Gaylen Sinclair (email Gaylen.Sinclair@ecy.wa.gov, or via telephone at 360-407-6496) is Ecology's contact and resource on entering data into EIM.

- The *April 2021 CAP* was not stamped by a Washington-state licensed geologist/hydrogeologist/engineer. Future reports that contain geological/hydrological descriptions and interpretations need to be submitted under the seal of an appropriately licensed professional, as required by Chapters 18.43 and 18.220 RCW.

2. Establishment of cleanup standards.

a. Soil.

Cleanup levels. The Site does not meet the MTCA definition of an industrial property; therefore, soil cleanup levels suitable for unrestricted land use are appropriate. For unrestricted land use, the MTCA Method A cleanup levels are appropriate for soil at the Site. The MTCA Method A cleanup levels are considered appropriate for protection of leaching to groundwater and direct contact pathways. These Method A cleanup levels are provided in WAC 173-340-900, Table 740-1.

Points of compliance. For soil cleanup levels based on the protection of groundwater, the point of compliance is defined as Site-wide throughout the soil profile and may extend below the water table. This is the appropriate point of compliance for the Site.

b. Groundwater.

Cleanup levels. Cleanup levels were set for groundwater based on its potential use as a drinking water source. The MTCA Method A cleanup levels are appropriate for this purpose, and were selected as the cleanup levels for groundwater at the Site. These Method A groundwater cleanup levels are available in WAC 173-340-900, Table 720-1.

Points of compliance. 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 which could potentially be affected. This is the appropriate point of compliance for the Site.

c. Air.

Cleanup levels. The MTCA Method B sub-slab soil gas screening levels and groundwater screening levels are appropriate for assessing the VI pathways at the Site. The MTCA Method B indoor air cleanup levels are appropriate for potential future indoor and ambient air samples

collected at the Site. These Method B levels are available in Ecology's *Cleanup Levels and Risk Calculation (CLARC)*[6] database.

Points of compliance. The standard point of compliance for air is in the ambient air throughout the Site. This is the appropriate point of compliance for the Site.

3. Selection of cleanup action.

The *April 2021 CAP* proposed in-situ chemical treatment as the cleanup action for the Site, which would consist of LNAPL extraction and chemical injection.

Ecology has determined that insufficient Site characterization data does not allow a determination as to whether the cleanup action you proposed for the Site meets the substantive requirements of MTCA at this time. Further Site characterization is needed before selecting the appropriate cleanup action. Ecology recommends submitting a work plan for further Site characterization to ensure sufficient data is collected to support cleanup action selection.

The process for evaluation and selection of cleanup actions should be completed through a Feasibility Study (FS), per WAC 173-340-350. See the FS Checklist[7] for guidance on FS report contents. Please note that if the Site is eligible for a Groundwater Model Remedy[8], a FS is not required.

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 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.

[6] https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC/Data-tables
[7] https://apps.ecology.wa.gov/publications/SummaryPages/1609007.html
[8] https://apps.ecology.wa.gov/publications/SummaryPages/1609057.html

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 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). After you have addressed our concerns, you may resubmit your proposal for our review. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our VCP webpage [9]. If you have any questions about this opinion, please contact me by phone at 425-229-2565 or e-mail at jing.song@ecy.wa.gov.

Sincerely,

Jing Song
Site Manager
NWRO Toxics Cleanup Program

Enclosures (2): A – Description and Diagrams of the Site
B – Basis for the Opinion: List of Documents

cc: Lynda Sadis, LKS Investments LLC, Property Owner
Dylan Galloway, Galloway Environmental, Inc. (dylan@gallowayenvironmental.com)
Sonia Fernandez, Ecology VCP Coordinator, (sonia.fernandez@ecy.wa.gov)

[9] www.ecy.wa.gov/vcp

Enclosure A

Description and Diagrams of the Site

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions expressed in the letter.

Site: The Site is defined as TPHg, BTEX, and naphthalene released to soil and groundwater at 9506 19th Avenue SE in Everett, Snohomish County, Washington (Property, **Figure 1**). The Property consists of a 0.96-acre irregular shape land with a Snohomish County parcel number 28051800401700 (**Figure 2**). The Property is located west of 19th Avenue SE, and approximately 440 feet north of the intersection of 19th Avenue SE and 96th Place SE. Interstate 5 (I-5) is located approximately 250 feet west of the Property.

According to MTCA, the Site is defined as all area impacted by the releases; currently the Site boundary has not been fully delineated.

Area and Property Description: The Property is located in a mixed commercial and residential area in Everett. The Property is currently developed with an irregular-shaped, two-story, multi-tenant commercial building and a parking lot.

The current uses of the surrounding properties include:

- North: A restaurant is immediately north. A multi-tenant office building is further north.
- South: A motel is immediately south. A warehouse and public storage is further south.
- West: Vegetated public land and Wood Creek is immediately west. I-5 is further west.
- East: 19th Avenue SE is immediately east. Across the street is a multi-tenant office building on the east, a church on the southeast, and a Shell-branded service station on the northeast. The Shell-branded service station is a cleanup site, and has received a NFA determination on November 22, 2013.

Property History and Current Use: The Property was initially developed in 1971. The current two-story building was constructed in 1971, and was occupied by an Arco gasoline service station and convenience store (ground floor) and a restaurant (second floor). The Arco station facilities included one 6,000-gallon and two 8,000-gallon gasoline USTs located south of the building, one 550-gallon waste oil UST at the southwestern corner of the building, and two dispenser islands located east of the building (**Figure 2**). The four USTs were removed in 1992. Petroleum-contaminated soil was encountered during the UST removal. Approximately 400 cubic yards of the contaminated soil were removed from the Site.

Three new 10,000-gallon gasoline USTs were installed south of the building in 1992, in the same general area of the former gasoline USTs. The Property operated as Suns Mini Mart and Gas at the time. Fuel sales continued at the Property until 2011, and the USTs and dispenser islands were removed in 2013. During the UST removal, gasoline was reportedly leaked from the product lines to the open excavation. Subsequent samples of the excavation sidewalls confirmed the presence of petroleum-contaminated soil in the UST area.

Sources of Contamination: The sources of the petroleum hydrocarbon contamination at the Site are the releases from the USTs, dispenser islands, and product piping associated with the former service station operations. The petroleum hydrocarbons released to soil and groundwater were initially discovered during the UST removal in 1992. The exact timing of the release occurrence is unknown. Petroleum product spilled into the UST excavation was again reported in 2013.

Physiographic Setting: The Site is situated at an elevation of approximately 470 feet above mean sea level (amsl). The land surface on Property and vicinity is generally sloping to the north-northeast. A heavily vegetated slope adjoins the Property to the west, descending 20 to 30 feet to the Wood Creek immediately west of the Property at elevations of 440 to 450 feet amsl.

Surface/Storm Water System: The nearest surface water is Wood Creek located immediately west of the Property. Wood Creek runs north-northeasterly and discharges to the Snohomish River. Stormwater is collected by catch basins and drains on the eastern portion of the Property, and discharges to the stormwater main located along 19th Avenue SE east of the Property.

Ecological Setting: The Property and nearby properties to the north, south, west, and northeast are zoned for commercial use. The Properties to the southeast are zoned for residential use. Land surfaces on the Property and adjacent properties are primarily covered by buildings and asphalt or concrete pavement, with some small landscaped areas covered with grass, bushes, and trees.

Geology: The Site is in the Puget Lowlands, an elongated topographic and structural depression filled with complex sequences of glacial and non-glacial sediments that overlie bedrock. Continental ice sheets up to 3,000 feet thick covered portions of the Puget Lowland several times during the Quaternary period. Retreating ice carved new landscapes, rechanneled rivers, drained or formed lakes, and deposited glacial drift including till and outwash.

The Site is located on the upper edge of an upland plain between Puget Sound and the Snohomish River, known as the Intercity Plateau. Based on the Geologic Map of Everett[1], the subsurface soil at the Site is Vashon till (Qvt), which is a dense layer of unsorted sand, gravel,

[1] https://ngmdb.usgs.gov/Prodesc/proddesc_7449.htm

and boulders, in a matrix of silt and clay. Underneath the till layer is Vashon advance outwash (Qva), which is a thick layer of stratified sand and gravel. Wood Creek, located immediately west of the Property, has eroded through the upper till layer and exposed the underlying advance outwash deposits.

Based on field observations during soil boring and monitoring well installation, subsurface soil at the Site consists of very dense, gray, silty sand and sandy silt with gravel to the total explored depth of 41 feet bgs. This is interpreted as glacial till.

Groundwater: In March 2016, four groundwater monitoring wells (GMW-1 through GMW-4) were installed at the Site. Among them, wells GMW-1 and GMW-4 are screened from 15 to 25 feet bgs, well GMW-2 is screened from 15 to 30 feet bgs, and well GMW-3 is screened from 20 to 35 feet bgs. The monitoring well locations are depicted on **Figure 2**.

Groundwater is present at depths from approximately 9 to 15 feet bgs in monitoring wells GMW-1, GMW-2, and GMW-4; groundwater is present at depths from approximately 20 to 35 feet bgs in monitoring well GMW-3. Groundwater depths in well GMW-3, located near eastern Property boundary, are generally approximately 10 to 25 feet deeper than those in other monitoring wells. The well screens in monitoring wells GMW-1, GMW-2, and GMW-4 are submerged under the groundwater table.

Groundwater appears to flow to the northeast based on the depth-to-groundwater measurements in monitoring wells GMW-1, GMW-2, and GMW-4. However, the local ground surface elevations and the proximity of the Site to Wood Creek indicates a likely shallow groundwater flow direction to the west towards the creek.

Water Supply: Drinking water is provided to the Property from a 12-inch-diameter water line located on 19th Ave SE. Drinking water is supplied by City of Everett, which is sourced from Spada Reservoir located approximately 16 miles east of the Site. According to Ecology's *Well Report* database, no water wells are located within a 0.5-mile radius of the Site.

Release and Extent of Contamination: Environmental assessments and interim actions were conducted at the Site since 1992. All soil and groundwater sampling locations are depicted on **Figure 3**. The following lists Site investigations and regulatory history in chronological order.

- 1992 first generation UST removal:
    - Four soil borings (SB-1 through SB-4) were advanced in January 1992 to a maximum depth of 31.5 feet bgs, prior to the UST removal. Soil samples were collected from the soil borings between 5 and 20 feet bgs. TPHg and BTEX concentrations were below the MTCA Method A soil cleanup levels. No groundwater samples were collected.

- Three gasoline USTs and one waste oil UST, two dispensers, and product lines were removed from Property in February 1992. Approximately 400 cubic yards of contaminated soil were removed from the Property.

- Soil samples were collected from the UST excavations, product line trenches, and under the dispensers. One soil sample collected at 13 feet bgs from the bottom of the gasoline UST excavation (EGTB), contained a benzene concentration above the MTCA Method A soil cleanup level. Two soil samples collected at 5 and 6 feet bgs from the western dispenser island (W-Pump-N and W-Pump-S), contained TPHg and toluene concentrations above the MTCA Method A soil cleanup levels.

- Two soil borings (B-1 and B-2) were advanced at the western dispenser island to a maximum depth of 8 feet bgs. Concentrations of TPHg, benzene, and total xylenes exceeded the MTCA Method A soil cleanup levels in the soil sample collected from boring B-2 at 8 feet bgs.

- The site was listed on the Confirmed and Suspected Contaminated Sites List (CSCSL) as "189 Mini Mart Arco 447" site in February 1992, with a cleanup site number 9746 and a Leaking Underground Storage Tank (LUST) number 2982. A NFA determination was issued to "189 Mini Mart Arco 447" site on December 21, 2011 after Ecology's initial investigation.

- 2013 second generation UST removal:

  - Three gasoline USTs were removed in October 2013. During UST removal, gasoline reportedly leaked from the product lines, spilled in the excavation and contacted the groundwater in the excavation (at 9 to 11 feet bgs). No groundwater samples were collected at the time.

  - Eight soil samples (N, NW, SW, N, S, NE, SE, and E) were collected from the excavation sidewalls between 8 and 11 feet bgs. Three soil samples (S, SE, and E) contained concentrations of TPHg or benzene above the MTCA Method A soil cleanup levels.

  - The site was listed on the CSCSL as "Suns Mini Mart & Gas" site in November 2013, with a cleanup site number 12382, and a LUST number 6825. The current site status is "awaiting cleanup".

- 2014 Phase II investigation:

  - In August 2014, 12 soil borings (B-1 through B-12) were advanced to total depths between 4 and 17 feet bgs in the former USTs and dispenser areas.

- Soil samples were collected from 4 to 14.5 feet bgs from the soil borings. Concentrations of TPHg, BTEX, and/or naphthalene exceeded the MTCA Method A soil cleanup levels in the soil samples collected at 14.5 feet bgs from boring B-4, and at 6 feet bgs from borings B-9 and B-10.

- One groundwater sample was collected from soil boring B-4 located within the former UST excavation. This groundwater sample contained concentrations of TPHg, BTEX, and naphthalene above the MTCA Method A groundwater cleanup levels.

- 2014 to 2016 Site assessment:

  - In December 2014, an attempt to re-excavate the former UST area was not successful due to wet and unstable soil. Six soil samples were collected from four locations (TP-1 though TP-4) from 6 to 8 feet bgs in the former UST area, which contained TPHg and BTEX concentrations below the MTCA Method A soil cleanup levels.

  - During the excavation attempt, gasoline was found in the abandoned product lines and vapor recovery lines that extended from former USTs to dispensers. The residual gasoline in the lines was recovered, and the lines were removed.

  - Before the line removal, six soil borings (GL-B-1 through GL-B-6) were advanced to a maximum depths of 10 feet bgs in the former dispenser area. Concentrations of TPHg or BTEX exceeded the MTCA Method A soil cleanup levels in soil samples collected between 5 and 10 feet bgs in soil borings GL-B-1, GL-B-2, GL-B-4, and GL-B-6.

  - After the line removal, eight soil samples (GLTP-1 through GLTP-8) were collected from the exposed soils. TPHg or benzene concentrations exceeded the MTCA Method A soil cleanup levels at 4 feet bgs at GLTP-3, and 4.5 feet bgs at GLTP-7.

  - In March 2016, nine soil borings (GL-B-7 through GL-B-15) were advanced to depths ranging from 26 to 41 feet bgs on the eastern portion of the Property. Four soil borings (GL-B-7, GL-B-9, GL-B-11, and GL-B-14) were completed as monitoring wells (GMW-1 through GMW-4). Groundwater samples were collected from these monitoring wells in March and July 2016. Temporary well screens were also placed in soil borings GL-B-8, GL-B-10, and GL-B-12 to obtain groundwater samples.

  - Soil samples were collected from 2.5 to 40 feet bgs in the soil borings. Concentrations of TPHg and/or BTEX exceeded the MTCA Method A soil cleanup levels in soil samples collected between 7.5 and 40 feet bgs from soil borings GL-B-9/GMW-2, GL-B-10, GL-B-11/GMW-3, GL-B-12, GL-B-13, GL-B-14/GMW-4, and GL-B-15. The deepest exceedances of Method A soil cleanup levels were at 40 feet bgs at soil borings GL-B-9/GMW-2, GL-B-13, and GL-B-15.

- Groundwater samples collected from monitoring wells GMW-2 through GMW-4, as well as soil borings GL-B-10 and GL-B-12, contained TPHg and BTEX concentrations above the MTCA Method A groundwater cleanup levels. Light non-aqueous-phase liquid (LNAPL) was detected in monitoring well GMW-4 in March 2016, at a thickness of 0.29 feet.

- Groundwater samples were collected in all four monitoring wells in October 2020. The following constituents exceeded the MTCA Method A groundwater cleanup levels in the following monitoring wells:

  - GMW-2: TPHg, benzene;
  - GMW-3: Benzene; and
  - GMW-4: TPHg, benzene, ethylbenzene, xylenes, and naphthalene.

Site Diagrams

Enclosure A: Figure 1

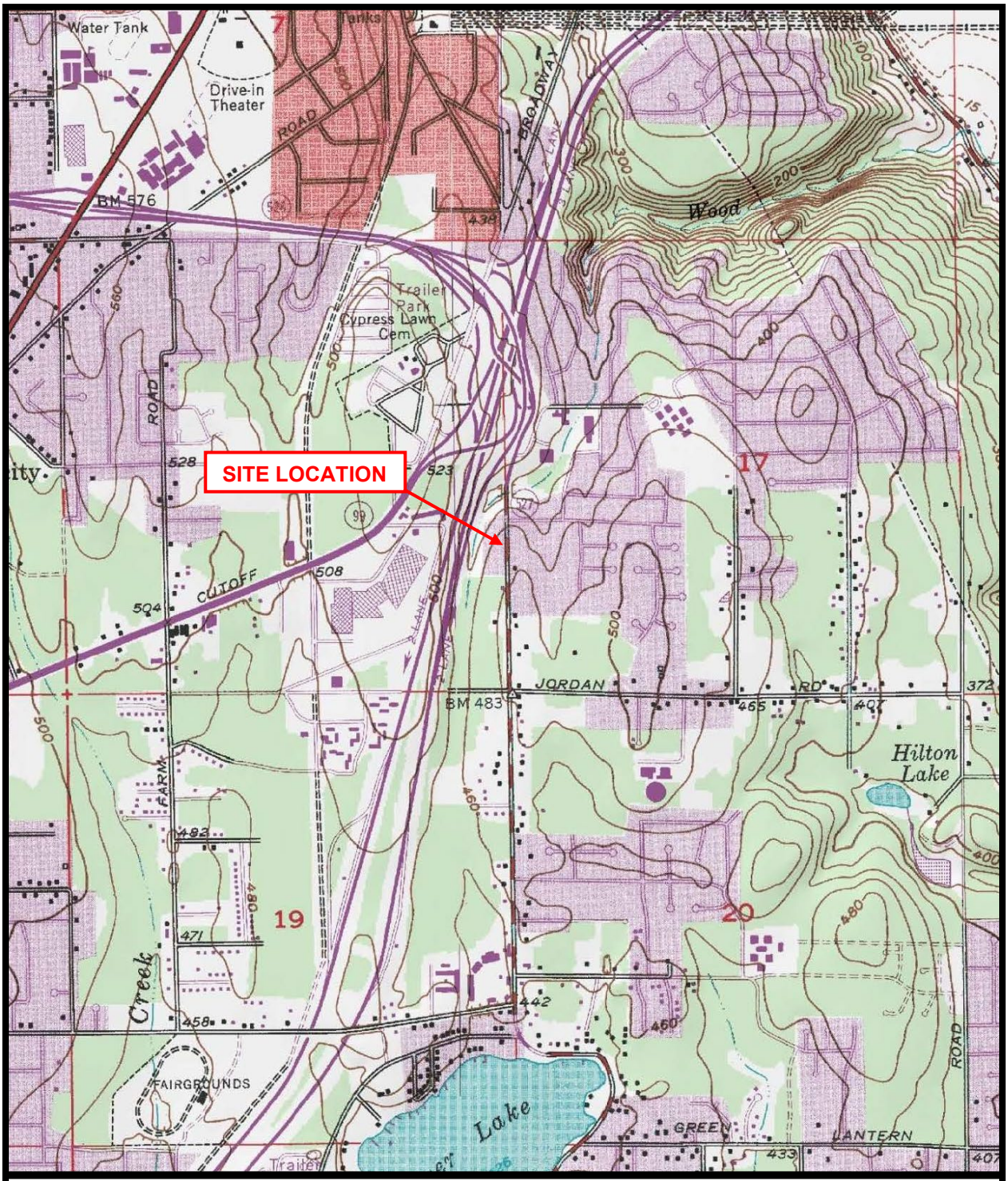

FIGURE 1 — SITE LOCATION MAP

Former Sun's Mini Mart and Gas

9506 19th Avenue SE, Everett, Washington
Source: WSDOT, April 2021; GEI Project #40026

0 1/4 mi 1/2 mi
(approx. scale)

N

Galloway
Environmental, Inc.

Enclosure A: Figure 2

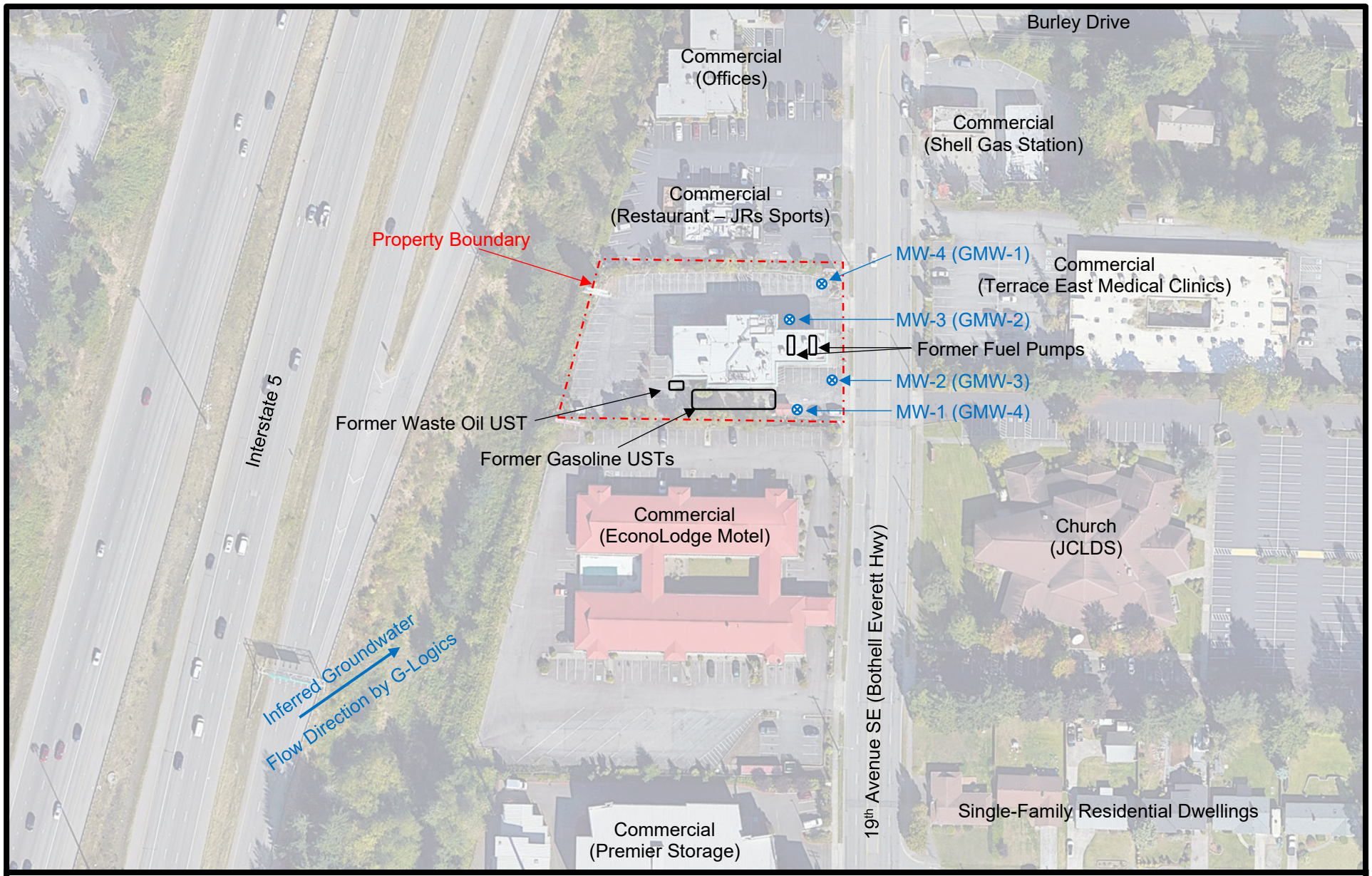

FIGURE 2 — SITE LAYOUT AND VICINITY MAP

Former Sun's Mini Mart and Gas

9506 19th Avenue SE, Everett, Washington

Source: G-Logics - 2016; GEI Project #40026

0 10 ft 200 ft

Approximate Scale

Note: Locations of all site features are approximate

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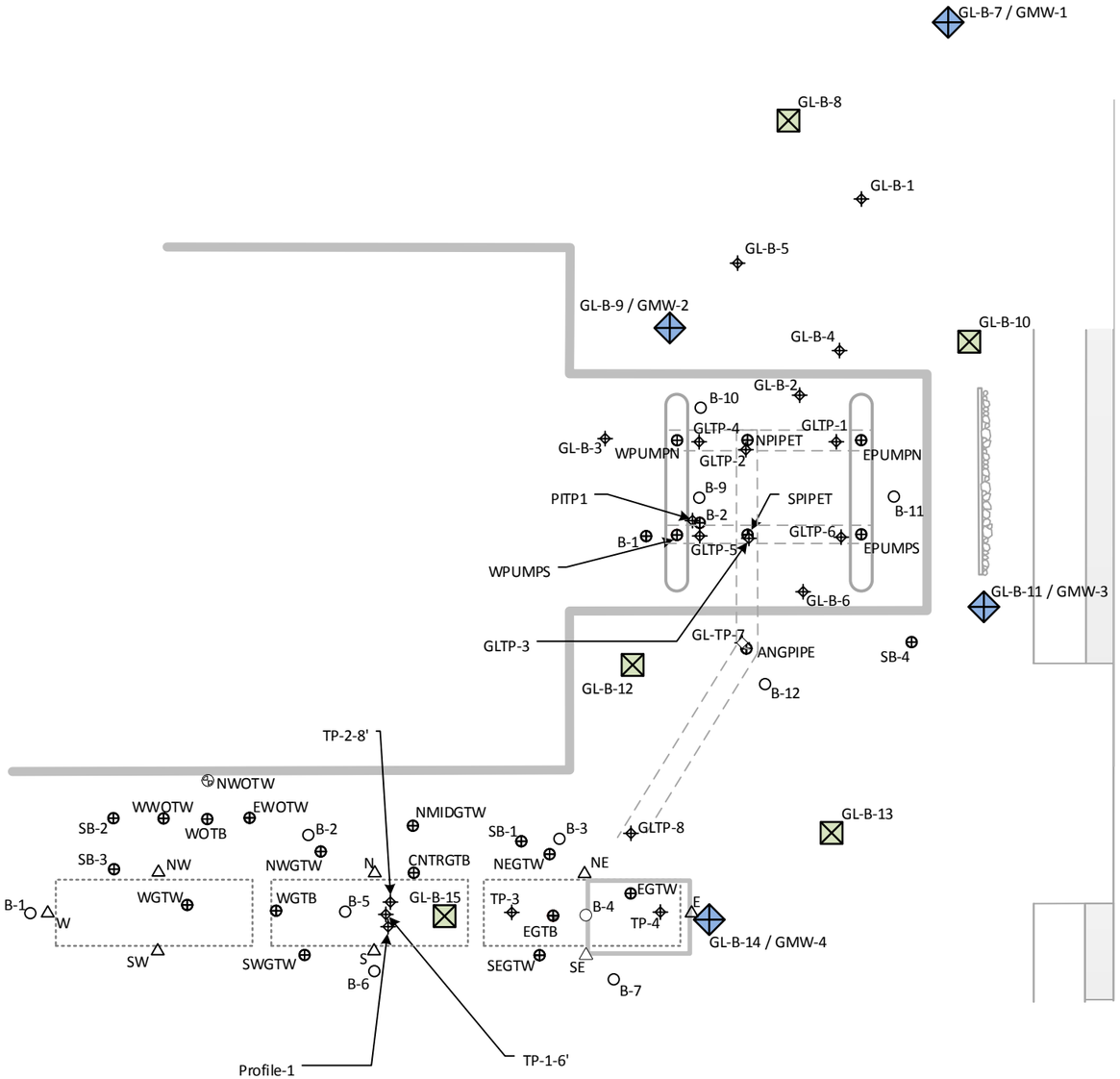
Enclosure A: Figure 3

Legend

- EMCON Sample Location
- Eco Compliance Corp.
- Aerotech Boring Location
- G-Logics Sample Location
- Former Dispenser Island
- Dispenser-Piping Trench
- Former Gasoline UST Location
- Soil Boring (March 2016)
- Monitoring Well (March 2016)



Project File: 01-0951-B-F3.vsd

g-logics

Note: This figure contains information in color. Black & white photocopies may not be suitable for review.

Approximate Drawing Scale: 1" = 20'

0 ft. 12 ft. 20 ft. 40 ft.

Site Diagram, Exploration Locations
Former Suns Mini Mart & Gas
9506 19th Ave SE
Everett, Washington

Figure 3

Mapping Reference: EMCON Northwest, Eco Compliance Corp., Aerotech Environmental Consulting, G-Logics Field Measurements, Google Earth

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Enclosure B

Basis for the Opinion:
List of Documents

1. EMCON Northwest Inc., *Tank Removal ad Site Assessment, ARCO Products Company, ARCO Facility 4473*, April 28, 1992.

2. Washington State Department of Ecology (Ecology), *Re: ARCO #4473 Final Cleanup Status*, June 9, 1992.

3. Ecology, *Initial Investigation Field Report, 189 Mini Mart, 9506 19th Avenue SE, Everett, WA 98208, LUST ID 2982*, May 17, 2011.

4. Ecology, *Re: No Further Action (NFA) Determination associated with Leaking Underground Storage Tank (LUST) Site, 189 Mini Mart, 9506 19th Avenue SE, Everett, WA 98208, LUST ID 2982*, December 21, 2011.

5. Eco Compliance Corporation, *UST Decommissioning and Site Assessment Report, 9506 19th Avenue SE, Everett, Washington 98208*, October 31, 2013.

6. Ecology, *Initial Investigation Field Report, Moons Gas & Grocery, Sun's Mini Mart & Gas, 9506 19th Ave SE, Everett, WA 98208, ERTS Number 646172*, January 13, 2014.

7. Aerotech Environmental Consulting, Inc., *Phase II Limited and Targeted Subsurface Investigation, CHJ Properties, LLC, 9506 19th Avenue Southeast, Everett, Washington 98208*, August 13, 2014.

8. G-Logics, *Property Cleanup Assistance, Commercial Property, Suns Mini Mart & Gas, 9506 19th Ave. SE, Everett, WA 98206*, March 9, 2015.

9. G-Logics, *Workplan to Conduct Additional Site Explorations, Hollow-Stem Auger Equipment and Mobile-Analytical Laboratory, Commercial Property, Suns Mini Mart & Gas, 9506 19th Ave. SE, Everett, WA 98206*, February 11, 2016.

10. G-Logics, *Environmental Assistance, Commercial Property, Suns Mini Mart & Gas, 9506 19th Ave. SE, Everett, WA 98206*, September 6, 2016.

11. Galloway Environmental Inc.(GEI), *Cleanup Action Plan for the Former Suns Mini Mart and Gas Site, 9506 19th Avenue Southeast, Everett, Washington*, April 27, 2021.

12. TRC, *RE: Technical Comments to Draft Cleanup Action Plan, Former Suns Mini Mart and Gas Site, 9506 19th Avenue South East, Everett, Washington*, June 16, 2021.

13. GEI, *Response to Comments to a Memorandum of Review by TRC, dated June 16, 2021*, October 8, 2021.