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DEPARTMENT OF ECOLOGY

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March 22, 2022

Dave Becher
Washington State Department of Transportation
999 3rd Ave, Suite 2200
Seattle, WA 98104
(BecherD@wsdot.wa.gov)

Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site:

- **Site Name:** Montlake Texaco
- **Site Address:** 2625 E Montlake Pl E, Seattle WA 98112
- **Facility/Site No.:** 47724816
- **Cleanup Site ID No.:** 14857
- **VCP Project No.:** NW3242

Dear Dave Becher:

The Washington State Department of Ecology (Ecology) received your request for an opinion on the *Remedial Action Completion Report, Montlake Gas Station (RACR)*, dated December 20, 2021, for the Montlake Texaco 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.

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:

- Total petroleum hydrocarbons (TPH) in the gasoline, diesel, and oil ranges (TPH-G, TPH-D, and TPH-O); benzene, toluene, ethylbenzene, and xylenes (BTEX); and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the Soil.
- TPH-G, TPH-D, TPH-O, BTEX, cPAHs, and arsenic into the Groundwater.

Enclosure A includes a 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, 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 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 and Opinion

Based on a review of the *RACR*, Ecology has determined:

- Ecology appreciates the efforts of WSDOT in planning and implementing the excavation and disposal of contaminated soil at the Site as an interim action consistent with MTCA. We understand the challenges of integrating the cleanup work as a component of the State Route 520 Montlake to Lake Washington Interchange and Bridge Replacement Project, including extensive coordination with the City of Seattle, King County, and Puget Sound Energy.
- Ecology provided an opinion via email dated March 8, 2022 regarding the groundwater compliance monitoring proposed in Appendix G of the *RACR*; see **Enclosure C**.
- Ecology concurs that the statistical analysis of confirmation soil samples sufficiently documents compliance with MTCA Method A soil cleanup levels on the Property.
- In order to continue an evaluation of whether a Property or Site cleanup (and associated No Further Action opinion) can be achieved for this Site, the lateral and vertical extent of contaminants that exceed MTCA Method A soil cleanup levels at the Site needs to be updated, within and outside of the boundaries of the tax parcels that comprise the Property. Ecology requests preparation of the following figures in this regard:
 - A revised Figure 9 from the *RACR* that includes:
 - Tax parcel boundaries;
 - Alignment of the Seattle combined sewer line; and
 - Borings with soil exceedances of Method A cleanup levels (from Exhibit 12 of the *Remedial Investigation Report*, with strikeouts of borings with soil example exceedance depths that were eliminated by the remedial excavation.
 - Updated cross sections using Exhibits 3 and 4 from the *Remedial Investigation Report* that include:

¹ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=14857>

² <https://ecology.wa.gov/publicrecords>

- Tax parcel boundaries;
 - Extent of the remedial excavations; and
 - Strikeouts of borings with soil example exceedance depths that were eliminated by the remedial excavations.
- Please submit a *RACR* addendum to Ecology that includes these items.
- Note that a Groundwater Model Remedy would only apply if a Site cleanup is achieved, per Ecology guidance. Property cleanups are not eligible for Model Remedies.
 - Ecology appreciates your uploading of Site data to the Environmental Information Management (EIM) database, through the most recent field collection end date of January 9, 2020. Please continue uploading data to EIM from the interim action and as results of additional samples from the Site are received.

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 performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080 and WAC 173-340-545.

3. 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 Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. 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 web site: www.ecy.wa.gov/vcp. If you have any questions about this opinion, please contact me by phone at (425) 324-1892 or by email at michael.warfel@ecy.wa.gov.

Sincerely,



Michael R. Warfel
Site Manager
Toxics Cleanup Program, NWRO

Enclosures (3): A – Description and Diagrams of the Site
 B – Basis for the Opinion: List of Documents
 C – Ecology Email Opinion Dated March 21, 2022 Regarding Proposed Groundwater Compliance Monitoring

cc: James Welles, PBS (james.welles@pbsusa.com)
 Meg Strong, Shannon & Wilson (mjs@shanwil.com)
 Margaret Kucharski, WSDOT (KucharM@wsdot.wa.gov)
 Sonia Fernandez, Ecology VCP Coordinator (sonia.fernandez@ecy.wa.gov)

Enclosure A

Description and Diagrams of the Site

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 as characterized to date is defined by TPH-G, TPH-D, TPH-O, BTEX releases to soil and TPH-G, TPH-D, TPH-O, BTEX, and arsenic releases to groundwater. The Property on which the Site release occurred is located on King County tax parcel numbers 8805901070, 8805901085, and 8805901090, with a total area of 0.65 acres. The street addresses associated with these parcels are 2010 Roanoke Street, 2625 East Montlake Place East, and 2601 22nd Avenue East, respectively.

Area and Property Description: The Site is located in the City of Seattle, Washington, in King County (**Figure 1**), and is bounded by the SR 520 eastbound off-ramp, East Montlake Place East, 22nd Avenue East, and East Roanoke Street (**Figure 2**). A gasoline service station and the Montlake Market formerly operated on the Property. The surrounding area is occupied by residential and limited commercial development.

Site History and Current Use: Earliest available records indicate that the Property was initially developed as early as 1926 and might have included gasoline service station activities at that time. King County Assessor records show the construction date of the Montlake Market building and the service station building as 1937 and 1952, respectively. The service station building was remodeled in approximately 1980 to incorporate bays for auto servicing and repair.

WSDOT acquired the Property in June 2019. Business activities in these two structures ceased at the end of 2019 and the structures were demolished in early 2020. The WSDOT contractor for the SR 520 Montlake Project is currently using the Property for construction equipment staging.

Sources of Contamination: Four underground storage tanks (USTs) remain in place at the Site:

- Two 10,000-gallon leaded gasoline (temporarily closed),
- 5,000-gallon unleaded gasoline (temporarily closed), and
- 300-gallon waste oil (closed in place).

The UST locations are shown on **Figure 2**.

Physiographic Setting: The Site is located in the Puget Sound Basin, which is bounded on the east by the Olympic Mountains and the west by the Cascade Mountains. The Site is situated at an elevation of approximately 60 feet above mean sea level (amsl) on a relatively flat area, at the northern terminus Capitol Hill, which reaches elevations exceeding 400 feet amsl to the south. Land slopes from the Site to the west, north, and east towards Portage Bay, State Route 520, and Union Bay, respectively.

Surface/Storm Water System: The Site is located approximately 800 feet, 1,200 feet, and 1,400 feet from Portage Bay, the Ship Canal, and Union Bay, respectively (see **Figure 1**). Stormwater runoff is routed to catch basins on the Property and adjacent City streets.

Ecological Setting: The Site is located in a developed area and is surrounded by roadways, commercial properties, and residences. The land surface of the Site and surrounding area is primarily covered by paving, with interspersed landscaping and open spaces. The Site qualified for a simplified Terrestrial Ecological Evaluation (TEE) per Ecology requirements, which concluded that no further evaluation was necessary.

Geology: Borings drilled on the Site encountered the following geologic strata:

- Sandy silt to silty sand (including pavement base course, fill, and native materials), approximately 18 feet thick;
- Sand to silty sand with gravel, discontinuous, encountered from 20 to 25 below ground surface (bgs); and
- Very dense silty sand to sandy silt (glacial till). The glacial till surface elevation is variable beneath the Site and forms a trough that extends southeast to northwest, varying in elevation from 45 feet to 31 feet amsl. The till extends to at least 60 feet bgs, the maximum depth explored.

Groundwater: Groundwater was encountered in monitoring wells drilled at the Site at depths of 9 to 17 feet bgs in October 2019, on top of the glacial till. A piezometric surface map prepared using these groundwater elevations indicates a flow direction to the north (**Figure 3**).

Groundwater flow appears to be influenced by the sloping surface of the glacial till and by the permeable backfill surrounding a 90-inch diameter combined sewer line that crosses the Site. Quarterly groundwater levels measured in one monitoring well over a 21-month period showed seasonal variations up to 12 feet.

Release and Extent of Contamination: Investigations completed at the Site have identified the following likely sources of petroleum contamination of soil and groundwater:

- Leaks from gasoline UST systems (tanks and piping),
- Spills from gasoline dispensing systems on pavement and seepage through pavement cracks, and
- Spills into stormwater catch basins and subsequent leakage from conveyance system piping.

A review of laboratory chromatograms of petroleum contaminated samples indicated that multiple releases likely occurred from these sources over time. This conclusion is based on the weathering patterns of petroleum constituents observed in the chromatograms.

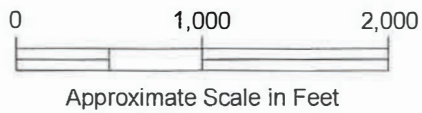
Contamination in soil and groundwater was observed in the area within and surrounding the pump islands, and extends into the adjacent E Montlake Place E and SR 520 rights-of-way. Contamination in groundwater also appears to extend to the north and northwest, within the backfill of the combined sewer line.

Completed Interim Action: The following interim actions were completed at the Site between June 22 and September 21, 2021:

- Removal of the three gasoline USTs (including associated piping and fuel dispensers), one waste oil UST, and one hydraulic hoist;
- Completion of a UST Site Assessment by a certified UST Site Assessor;
- Decommissioning of two monitoring wells (RW-1-19 and MW-1-19) and two soil gas probes (SG-1-19 and SG-2-19);
- Completion of the Stage 1 and Stage 2 soil excavations;
- Transport and off-Site disposal of approximately 19,154 tons of contaminated soil, 257 tons of uncontaminated soil, and 10,000 gallons of contaminated waste water (groundwater plus truck-tire decontamination water);
- Collection of confirmation soil samples from the excavated areas; and
- Placement and compaction of clean backfill mixed with oxygen-release compound.

The lateral and vertical extent of the excavation are shown on **Figures 4 and 5**, respectively. Confirmation soil sample results are shown on **Figure 6**. A statistical evaluation of confirmation soil samples documented compliance with Method A soil cleanup levels. Installation of additional compliance monitoring wells and implementation of quarterly groundwater monitoring is in progress.

Site Diagrams



NOTE

Bing Map Image adapted from aerial imagery provided by Autodesk Live Maps and Microsoft Bing Maps reprinted with permission from Microsoft Corporation.

Montlake Gas Station VCP
Remedial Investigation Report
2625 Montlake Place East
Seattle, WA

VICINITY MAP

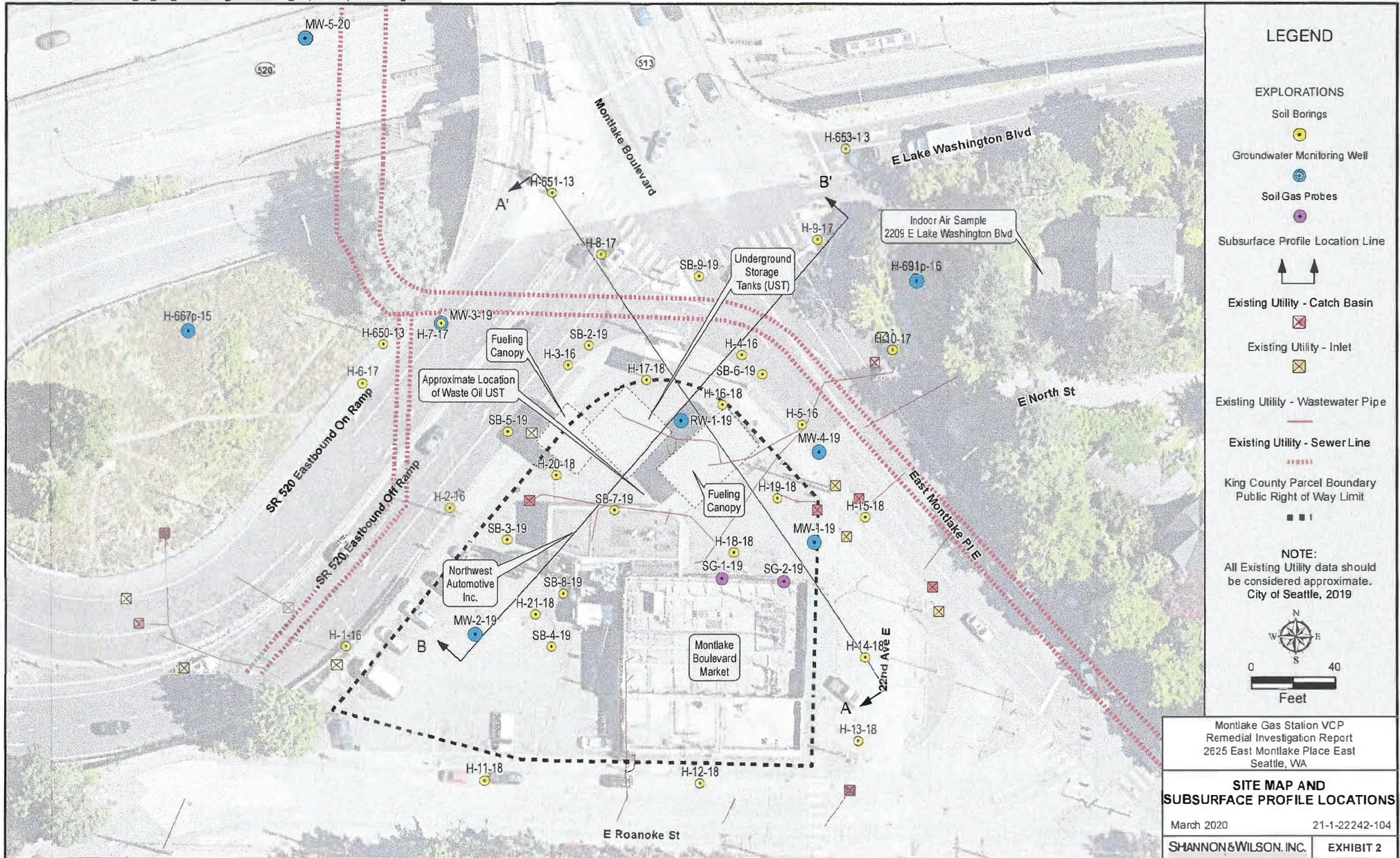
March 2020

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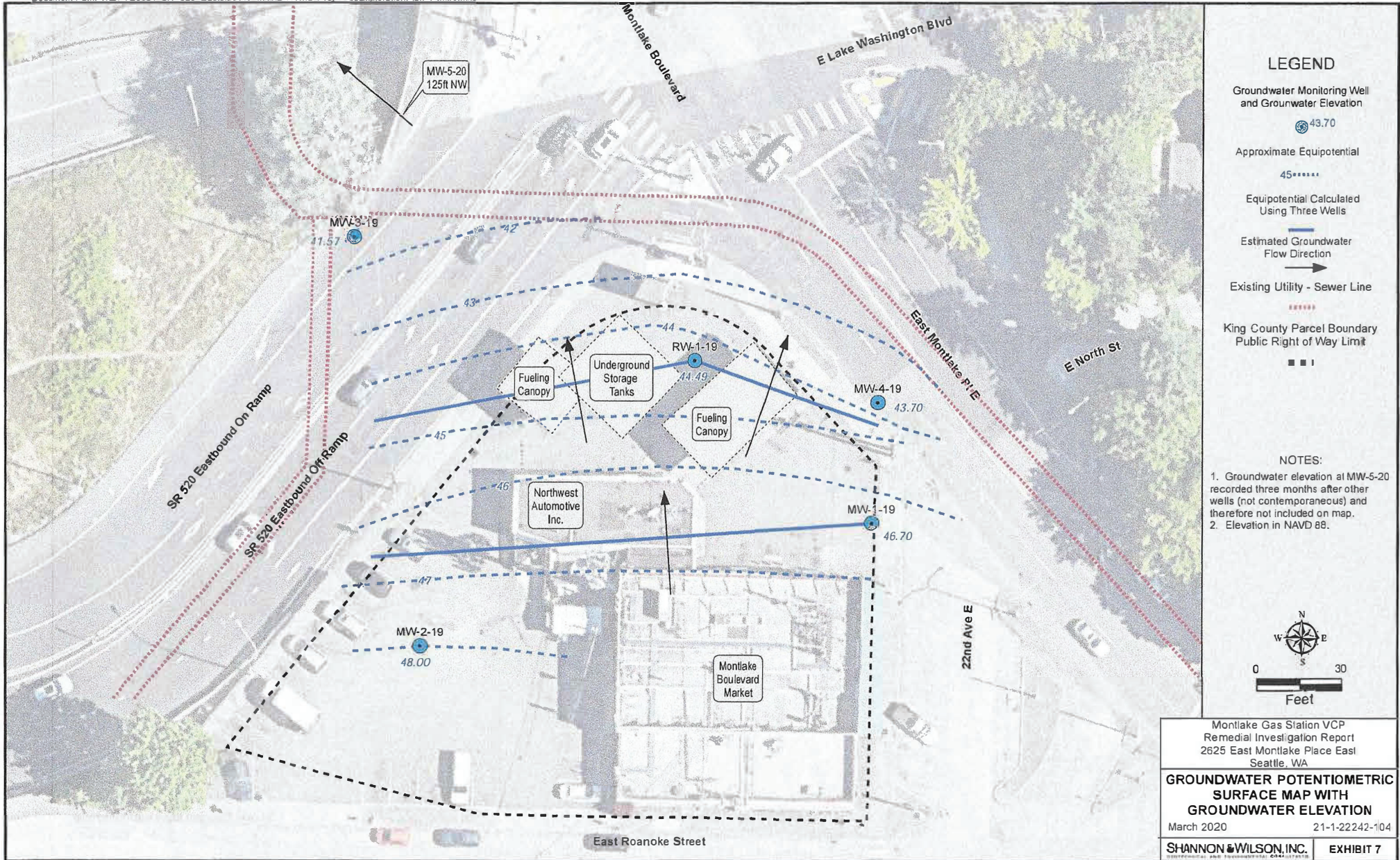
SHANNON & WILSON, INC.
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

Exhibit 1

Enclosure A, Figure 1

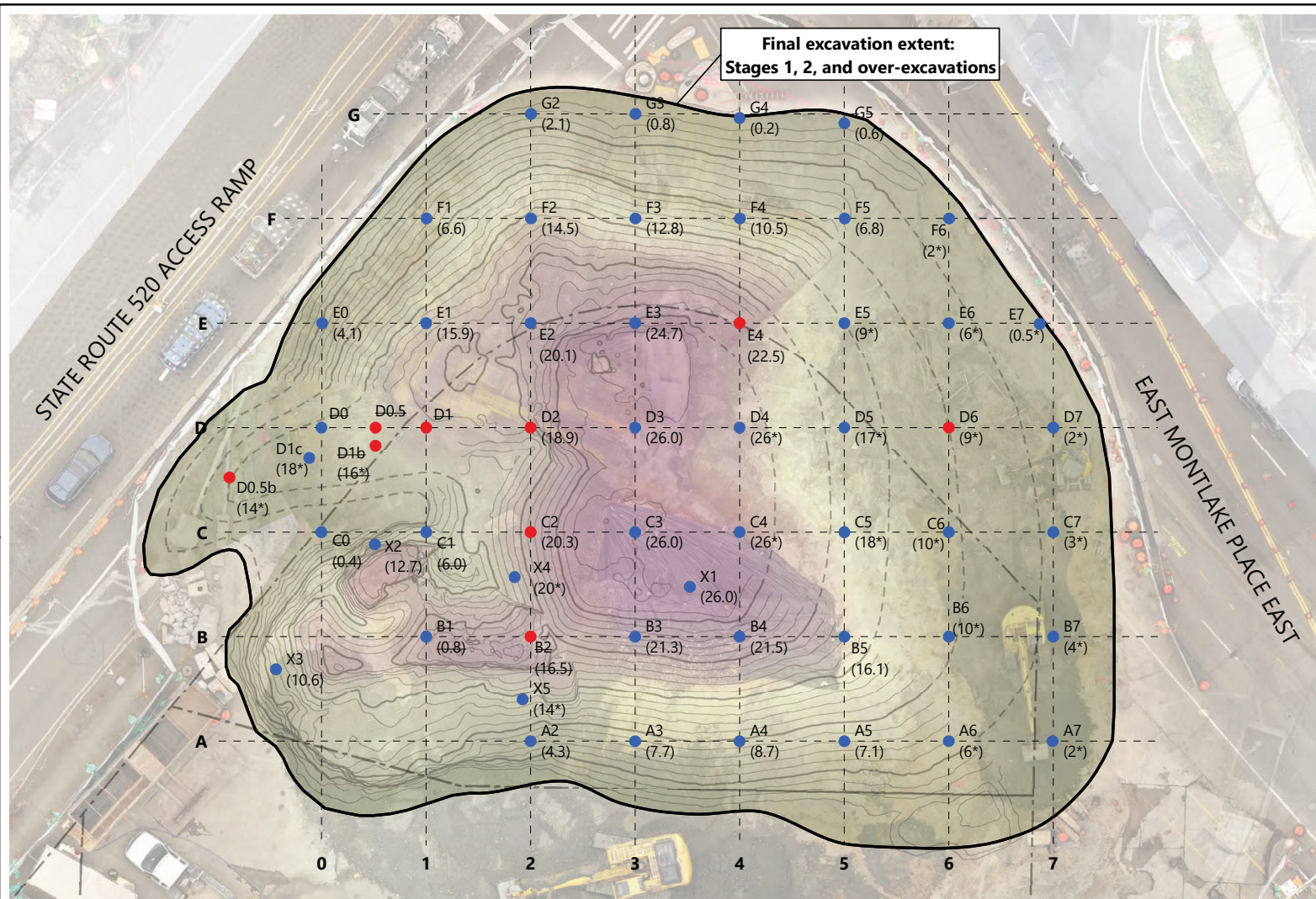


Enclosure A, Figure 2



Enclosure A, Figure 3

G:\Projects\41000\41221\Graham Construction & Management\41221.003_SRS20_Montlake Project\GIS\Fig6_FinalExcavationLimits.mxd; AUTHOR: nathand



Notes:

- Elevations are shown in feet above mean sea level (amsl). This Digital Surface Model (DSM) was derived from survey-controlled PBS UAS photography. Areas with dashed contour lines were not recorded by UAS imagery prior to emplacement of fill.
- Sample depths (in feet below ground surface) calculated based on mean ground surface elevation of 59.0 feet above mean sea level.
- Samples were analyzed for the following contaminants of concern: Gasoline by EPA Method NWTPH-Gx; BTEX by EPA Method 8021; Total Arsenic by EPA Method 6020.
- ~~Strikethrough~~ indicates location of sample removed by subsequent excavation.

Footnotes:

* indicates sample elevation was estimated in the field.

LEGEND

- E4 (22.5) Contamination Detected Above MTCA Method A Cleanup Level (Depth of Sample in feet below ground surface)
- G2 (2.1) No Contaminants of Concern Detected Above MTCA Method A Cleanup Level (Depth of Sample in feet below ground surface)
- - A Confirmation Sampling Gridline (20-foot centers)
- Approximate Excavation Boundary

IMAGERY SOURCE: PBS UAS AERIAL PHOTOGRAPHY (EXCAVATION AREA: AUGUST 17, 2021; SURROUNDINGS: JANUARY 27, 2021)
PROJECTION: NAD 2011 WA STATE PLANE NORTH LAMBERT US FT; VERTICAL: NAVD88

- Parcel Boundaries
- Topographic Contour Lines
 - - - 5-foot contours estimated from field observations
 - 5-foot contours derived from UAS DSM (see Notes)
 - 1-foot contours derived from UAS DSM (see Notes)

DSM Elevation (feet above mean sea level)

59 ————— 33

1 inch = 20 feet

0 10 20 40'

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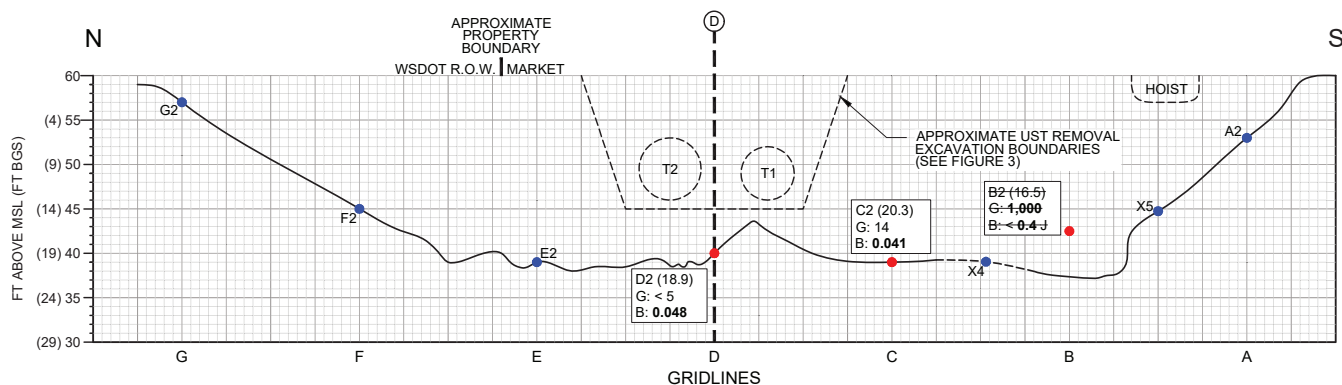
**FINAL EXCAVATION LIMITS
AND SOIL SAMPLE LOCATIONS**
MONTLAKE GAS STATION (VCP NW3242)

PROJECT	41221.003
DATE	DEC 2021
FIGURE	8

Enclosure A, Figure 4

FULL SIZE SHEET FORMAT IS 11X17; IF PRINTED SIZE IS NOT 11X17, THEN THIS SHEET FORMAT HAS BEEN MODIFIED AND INDICATED DRAWING SCALE IS NOT ACCURATE

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GUIDE TO SAMPLE RESULTS TABLES

SAMPLE NAME (DEPTH BELOW GROUND SURFACE)
 G: DETECTED CONCENTRATION OF GASOLINE IN mg/kg
 B: DETECTED CONCENTRATION OF BENZENE IN mg/kg

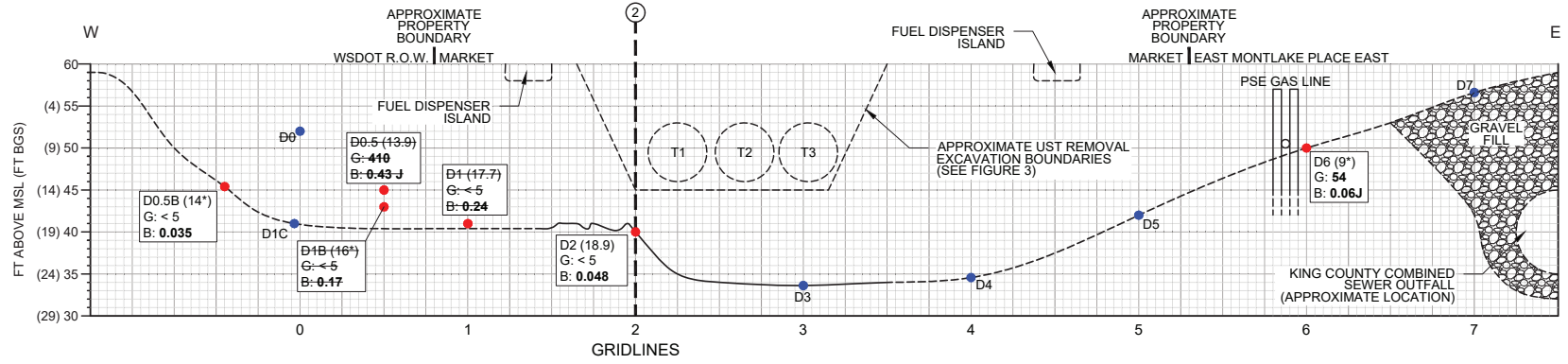
< INDICATES ANALYTE WAS NOT DETECTED ABOVE INDICATED LABORATORY REPORTING LIMIT.

BOLD INDICATES THE DETECTED CONCENTRATION EXCEEDS MTCA METHOD A SOIL CLEANUP LEVEL.

MTCA METHOD A CLEANUP LEVELS IN SOIL:
 GASOLINE: 30 MG/KG
 BENZENE: 0.03 MG/KG

STRIKETHROUGH INDICATED LOCATION OF SAMPLE REMOVED BY SUBSEQUENT EXCAVATION

EXCAVATION CROSS-SECTION ALONG "2" GRIDLINE
 SCALE: 1" = 14'-0"



EXCAVATION CROSS-SECTION ALONG "D" GRIDLINE
 SCALE: 1" = 14'-0"

FOOTNOTES

* INDICATES SAMPLE ELEVATION WAS ESTIMATED IN THE FIELD.
 SAMPLE D0.5B PROJECTED ONTO CROSS-SECTION ALONG D GRID LINE. SEE FIGURE 2 FOR PRECISE LOCATION.
 J INDICATED RESULT QUALIFIED AS ESTIMATED BY THE LABORATORY.

LEGEND

- D2 (16.5) G: **1,000** B: < 0.04 CONTAMINATION DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL
- G2 NO CONTAMINANTS OF CONCERN DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL
- EXCAVATION DEPTH DERIVED FROM UAS IMAGERY (SEE NOTES)
- - - EXCAVATION DEPTH ESTIMATED FROM FIELD OBSERVATIONS

NOTES

1. SAMPLE DEPTHS (IN FEET BELOW GROUND SURFACE, FT BGS) CALCULATED BASED ON MEAN GROUND SURFACE ELEVATION OF 59.0 FEET ABOVE MEAN SEA LEVEL.
2. EXCAVATION ELEVATIONS DERIVED FROM SURVEY-CONTROLLED PBS UAS PHOTOGRAPHY. DASHED LINES INDICATE AREAS THAT WERE NOT RECORDED BY UAS IMAGERY PRIOR TO EMPLACEMENT OF FILL.
3. SAMPLES WERE ANALYZED FOR THE FOLLOWING CONTAMINANTS OF CONCERN: GASOLINE BY EPA METHOD NWTPH-GX; BTEX BY EPA METHOD 8021; TOTAL ARSENIC BY EPA METHOD 6020. HOIST AND WASTE OIL UST SITE ASSESSMENT SAMPLES ALSO ANALYZED FOR DIESEL BY NWTPH-DX, POLYCYCLIC AROMATIC HYDROCARBONS (PAHS) BY EPA METHOD 8270, AND POLYCHLORINATED BIPHENYLS (PCBS) BY EPA METHOD 8082.
4. CONCENTRATIONS OF GASOLINE AND BENZENE ARE LISTED; NO OTHER CONTAMINANTS OF CONCERN WERE DETECTED ABOVE CLEANUP LEVEL.

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EXCAVATION CROSS-SECTIONS
MONTLAKE GAS STATION (VCP NW3242)

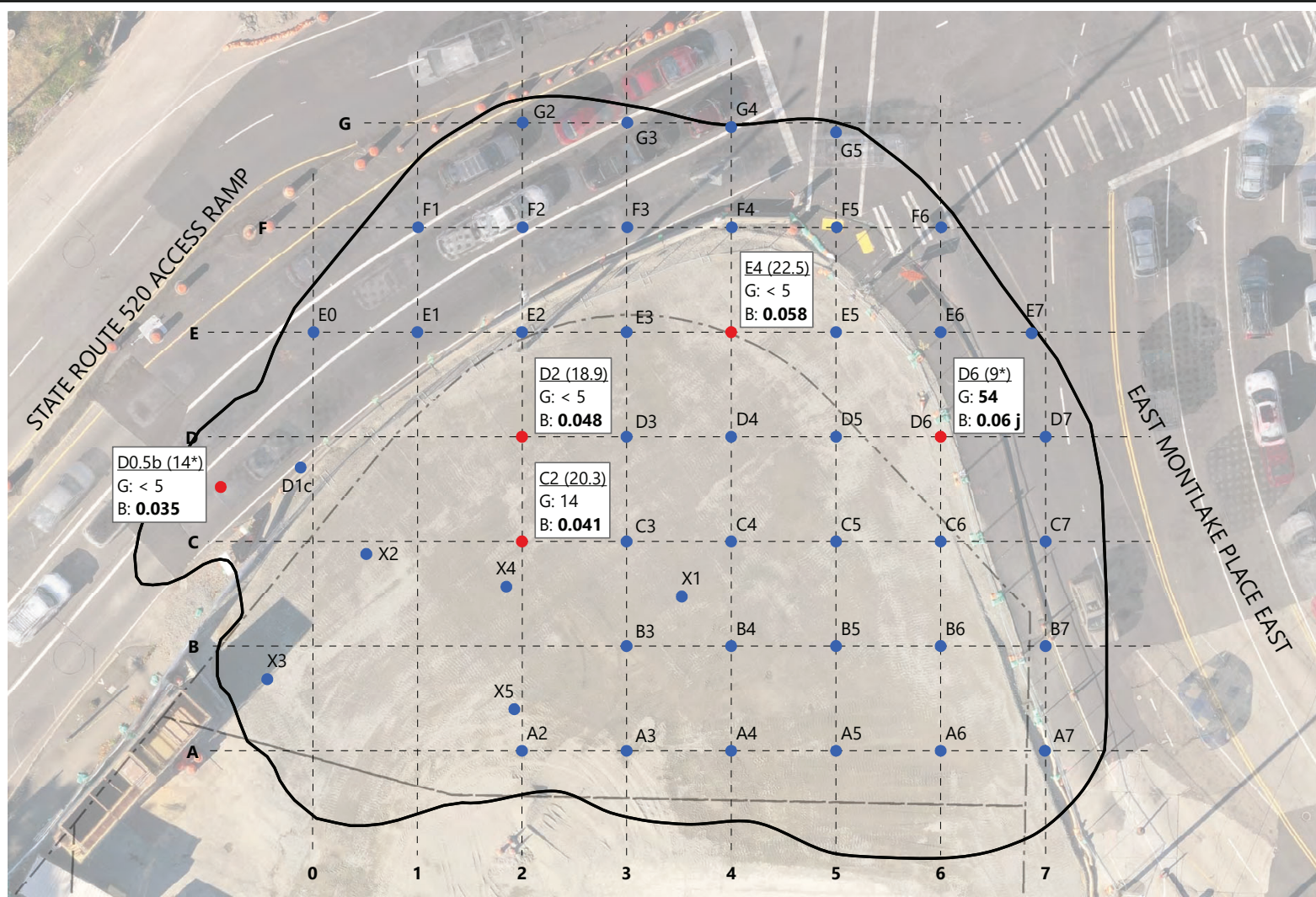
PROJECT	41221.003
DATE	NOV 2021
FIGURE	7

Full Size Sheet Format Is 11x17; If Printed Size Is Not 11x17, Then This Sheet Format Has Been Modified & Indicated Drawing Scale Is Not Accurate.

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Enclosure A, Figure 5

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LEGEND

- D2 (18.9)
G: < 5
B: 0.048 Contamination Detected Above MTCA Method A Cleanup Level
- G2 No Contaminants of Concern Detected Above MTCA Method A Cleanup Level
- A Confirmation Sampling Gridline (20-foot centers)
- Approximate Excavation Boundary
- Parcel Boundaries

Guide to Sample Results Tables:

Sample Name (Depth in feet below ground surface)

G: Detected Concentration of Gasoline in mg/kg.

B: Detected Concentration of Benzene in mg/kg.

< indicates analyte was not detected above indicated laboratory reporting limit.

Bold indicates the detected concentration exceeds MTCA Method A Soil Cleanup Level.

IMAGERY SOURCE: PBS UAS AERIAL PHOTOGRAPHY (OCTOBER 7, 2021).
PROJECTION: NAD 2011 WA STATE PLANE NORTH LAMBERT US FT; VERTICAL: NAVD88

Notes:

1. Sample depths (in feet below ground surface) calculated based on mean ground surface elevation of 59.0 feet above mean sea level.
2. Samples were analyzed for the following contaminants of concern:
Gasoline by EPA Method NWTPH-Gx; BTEX by EPA Method 8021; Total Arsenic by EPA Method 6020.
3. MTCA Method A Cleanup Levels in Soil:
Gasoline: 30 mg/kg
Benzene: 0.03 mg/kg
4. Concentrations of Gasoline and Benzene are listed; no other contaminants of concern were detected above cleanup level.

Footnotes:

* indicates sample elevation was estimated in the field.



PREPARED FOR: GRAHAM CONSTRUCTION

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POST-REMEDATION CONTAMINANT CONCENTRATIONS IN SOIL
MONTLAKE GAS STATION (VCP NW3242)

PROJECT	41221.003
DATE	DEC 2021
FIGURE	9

FULL SIZE SHEET FORMAT IS 11X17; IF PRINTED SIZE IS NOT 11X17, THEN THIS SHEET FORMAT HAS BEEN MODIFIED AND INDICATED DRAWING SCALE IS NOT ACCURATE

Enclosure A, Figure 6

Enclosure B

**Basis for the Opinion:
List of Documents**

1. Washington State Department of Ecology (Ecology), 2022. Email Opinion Regarding Proposed Groundwater Compliance Monitoring, Montlake Texaco, VCP NW3242. March 8, 2022.
2. PBS, 2021. *Remedial Action Completion Report, Montlake Gas Station, 2625 East Montlake Place East, Seattle, Washington*. Prepared for Graham Contracting Ltd., Bellevue, WA. December 20, 2021.
3. Ecology, 2021. Opinion on Remedial Action Plan, Montlake Texaco, VCP NW3242. May 19, 2021.
4. PBS, 2021. *Remedial Action Plan, Montlake Gas Station, State Route 520 Montlake to Lake Washington Interchange and Bridge Replacement Project, Seattle, WA*. Prepared for Graham Contracting Ltd., Bellevue, WA. March 31, 2021.
5. Washington State Department of Transportation (WSDOT), 2020. *VCP NW 3242, Response to Ecology Opinion Letter Dated July 6, 2020, Montlake Gas Station Remedial Investigation*. October 27, 2020.
6. Ecology, 2020. Opinion on Remedial Investigation Report, Montlake Texaco, VCP NW3242. July 6, 2020.
7. Shannon & Wilson (S&W), 2020. *Remedial Investigation Report for Montlake Gas Station, SR 520 Bridge Replacement and HOV Program, Seattle, Washington*. Prepared for Washington State Department of Transportation (WSDOT). March 10, 2020.
8. S&W, 2019. *Data Gaps Investigation Work Plan/Sampling and Analysis Plan for Montlake Gas Station, SR 520 Bridge Replacement and HOV Program, Seattle, Washington*. Prepared for WSDOT. July 23, 2019.
9. S&W, 2019. *2209 East Lake Washington Boulevard Indoor Air Testing*. Letter to Ron Paananen, HDR. March 8, 2019.
10. Hart Crowser, 2019. *Phase II Environmental Site Assessment, Montlake Market and Gas Station Properties, 2625 East Montlake Place East and 2605 22nd Avenue East, Seattle, Washington*. Prepared for Montlake LLC and Stelter Montlake LLC. January 30, 2019.
11. Hart Crowser, 2019. *Phase II Environmental Site Assessment, Montlake Market and Gas Station Properties, 2625 East Montlake Place East and 2605 22nd Avenue East, Seattle, Washington; Release Reporting Letter to Washington State Department of Ecology*. Prepared for Montlake LLC and Stelter Montlake LLC. January 30, 2019.
12. Ecology, 2019. *Early Notice Letter Regarding Release of Hazardous Substances, Montlake Texaco Site, Letter to Scott Baker, Montlake Texaco, 2625 E Montlake Place E, Seattle, WA 98112*. January 28, 2019.

13. Ecology, 2019. *Early Notice Letter Regarding Release of Hazardous Substances, Montlake Texaco Site, Letter to Kemper Development Company, 575 Bellevue Square, Bellevue WA 98104*. January 28, 2019.
14. Innovex Environmental Management, Inc. (Innovex), 2019. *Third Supplemental Limited Phase II Environmental Site Assessment, 2625 East Montlake Place East, Seattle, Washington*. Prepared for WSDOT. January 16, 2019.

15. Innovex, 2018. *Second Supplemental Limited Phase II Environmental Site Assessment, 2625 East Montlake Place East, Seattle, Washington*. Prepared for WSDOT. June 15, 2018.
16. Innovex, 2018. *Supplemental Limited Phase II Environmental Site Assessment, 2625 East Montlake Place East, Seattle, Washington*. Prepared for WSDOT. February 21, 2018.
17. Innovex, 2016. *Phase II Environmental Site Assessment, State Route (SR) 520 Eastbound Off-Ramp to Montlake Vicinity, Seattle, Washington*. Prepared for WSDOT. December 8, 2016.
18. WSDOT, 2016. *Limited Phase I Environmental Site Assessment, SR520 Montlake '76 Gasoline and Service Station, Seattle, Washington*. February 16, 2016.

Enclosure C

Ecology Email Opinion Dated March 8, 2022 Regarding Proposed Groundwater Compliance Monitoring

From: [Warfel, Michael \(ECY\)](#)
To: [Becher, Dave](#)
Cc: ["Kucharski, Margaret"](#); [Meg Strong](#); [James Welles](#); [De Leuw, Katie \(Consultant\)](#)
Subject: VCP NW3242, Montlake Texaco - Revised Opinion Regarding Proposed Monitoring Wells
Date: Monday, March 21, 2022 11:42:31 AM
Attachments: [Exhibit 6 - GW Hydrograph.pdf](#)
[Exhibit 14 - Recon GW Samples.pdf](#)
[Montlake Gas Station Compliance Monitoring Plan Revised Figure 1.pdf](#)

Hello Dave:

WSDOT brought to my attention that the opinion in my prior email to you dated March 8, 2022 included some errors in soil boring reference numbers and also needed clarification regarding submission of future Site data. This revised opinion provides those corrections and clarifications.

Ecology greatly appreciates the large-scale interim action completed at the Site during July through September 2021. As a follow up to our virtual meeting on March 1 (regarding the WSDOT opinion request on the *Remedial Action Completion Report (RACP)* dated December 20, 2021), Ecology is providing this email opinion in advance of the requested VCP opinion letter. The purpose of this email opinion is to facilitate planning and installation of new monitoring wells at the Site as soon as possible.

We provide the following comments on Appendix G of the *RACP, Compliance Groundwater Monitoring Plan (CGMP)*, and revised Exhibit 1 of the *CGMP* (attached for reference):

- Ecology concurs with the locations of proposed monitoring wells MW-6-21 and MW-7-21, and inclusion of existing monitoring wells MW-2-19 and H-667p-15 in the monitoring well network.
- The following large historical exceedances of Method A groundwater cleanup levels were documented at the Site prior to implementation of the interim action, as illustrated in the *Remedial Investigation Report (RIR)*, March 2020:

Contaminants	Maximum Concentration, µg/L	Method A Cleanup Level, µg/L
TPH-G	110,000	800
TPH-D+O	36,900	500
Benzene	8,700	5
Xylenes	18,600	1,000

Two locations where prior groundwater samples showed large exceedances of Method A cleanup levels were reconnaissance borings SB-7-19 and H-19-18, as shown on Exhibit 14 of the *RIR* (attached for reference). As the Site moves into confirmational groundwater monitoring and evaluation of the need for an environmental covenant, characterization of groundwater quality beneath the entire Site is critical. Therefore, Ecology recommends installation of two additional monitoring wells at the locations of these two former borings.

- Ecology recommends the following regarding installation of new monitoring wells:
 - Set screened intervals such that the tops of the screens are above the seasonal high water table (approximately 51 feet NAVD88), and deep enough to provide samples at the seasonal low water table (approximately 39 feet NAVD88), per Exhibit 6 of the *RIR* (attached for reference). Screening the wells below the excavation backfill should not be used as a criterion for well completion.
 - Survey the top rims of new well casings to NAVD88 vertical datum, to the nearest 0.01 foot.
 - Submit monitoring well installation information to Ecology with a cover letter that includes well construction diagrams, geologic logs, and well development documentation.
- Ecology recommends the following regarding the groundwater compliance monitoring plan:
 - Remove the ORC sock from monitoring well MW-3-19 as soon as possible, such that equilibrium conditions occur prior to the next groundwater monitoring event.
 - Include upgradient monitoring well MW-2-19 in the next groundwater monitoring event.
 - Submit quarterly compliance groundwater monitoring data to Ecology with a cover letter that includes:
 - Updated piezometric surface elevation map (NAVD88 vertical datum);
 - Site map showing sampling results for each monitoring well;
 - Adding of TPH-D + TPH-O results in tables and on figures, for comparison to the Method A cleanup level of 500 µg/L; and
 - Confirmation that data from the sampling event will be uploaded to the Ecology Environmental Information Management (EIM) database.
- Ecology concurs with the proposed groundwater sample collection methods and analytical parameters.

Ecology will provide detailed comments on the remainder of the *RACP* in the pending VCP opinion letter.

Sincerely,

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