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## DEPARTMENT OF ECOLOGY

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April 13, 2022

Mike Leong Sea Mar Community Health Center 1040 S Henderson St Seattle, WA 98108 (<u>MikeLeong@seamarchc.org</u>)

## Re: No Further Action at the following Site:

- Site Name: Sea Mar Community Health Center Dominics Plaza
- Site Address: 9635 Des Moines Memorial Drive S, Seattle, WA, 98108
- Facility/Site No.: 22844
- Cleanup Site No.: 13070
- VCP Project No.: NW3172

## Dear Mike Leong:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Sea Mar Community Health Center Dominics Plaza 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**

Is further remedial action necessary to clean up contamination at the Site?

# NO. Ecology has determined that no further remedial action is 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:

- Petroleum hydrocarbons in the gasoline, diesel, and oil ranges (TPHg, TPHd, and TPHo), benzene, ethylbenzene, xylenes, cadmium, lead, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the Soil.
- TPHg, TPHd, TPHo, and benzene into the Groundwater.

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

Please note the FMH Material Handling Solutions facility (<u>Cleanup Site No. 7542</u><sup>1</sup>) also affects the parcel of real property associated with this Site. This opinion does not apply to any contamination associated with the FMH Material Handling Solutions facility.

## **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 <u>Site webpage</u><sup>2</sup>. The complete records are stored in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our <u>Public Records Request page</u><sup>3</sup>, 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 <u>publicrecordsofficer@ecy.wa.gov</u> 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 no further remedial action is 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.** 

The lateral and vertical extent of soil and groundwater contamination were adequately defined by Site investigations conducted between 2007 and 2018. Soil and groundwater samples collected after removal of contaminated soil confirmed that petroleum concentrations remaining at the Site are below applicable cleanup levels. Site data has been uploaded to Ecology's Environmental Information Management (EIM) database.

## 2. Establishment of cleanup standards.

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

## Soil

<u>Cleanup Levels</u>: Method B cleanup levels protective of the direct contact exposure pathway were selected for this Site. For TPH, the generic Method B value of 1500 mg/kg (applicable to total TPH concentration for mixtures containing TPHg) was used instead of calculating a site-specific Method B cleanup level.

<sup>&</sup>lt;sup>1</sup> <u>https://apps.ecology.wa.gov/cleanupsearch/site/7542</u>

<sup>&</sup>lt;sup>2</sup> <u>https://apps.ecology.wa.gov/cleanupsearch/site/13070</u>

<sup>&</sup>lt;sup>3</sup> <u>https://ecology.wa.gov/publicrecords</u>

The use of direct-contact based cleanup levels was determined to be appropriate after considering the following pathways at the Site:

- Leaching to groundwater: Site data provided an empirical demonstration that TPH in soil is not impacting groundwater. Details of the empirical demonstration are provided in Enclosure A.
- **Protection of terrestrial ecological receptors:** A simplified Terrestrial Ecological Evaluation (TEE) was performed for the Site. The evaluation was ended at the Exposure Analysis step, with no additional consideration of terrestrial ecological receptors necessary when selecting cleanup levels. Additional details of the TEE are provided in **Enclosure A**.
- **Protection of soil vapor quality/vapor intrusion:** The limited amount of petroleum remaining in the soil is not expected to have significant effects on soil vapor quality. There is no remaining source of petroleum vapor in groundwater. No additional vapor intrusion evaluation is necessary.

<u>Point of Compliance</u>: The standard point of compliance for cleanup levels based on direct contact is throughout the Site from the ground surface to 15 feet below ground surface (bgs).

## Groundwater

<u>Cleanup Levels</u>: Method A cleanup levels for unrestricted land use were appropriately selected for this Site.

<u>Point of Compliance</u>: The standard point of compliance for groundwater is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected.

## 3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA. The selected action included the removal of USTs, excavation of contaminated soil with confirmation sampling, off-Site disposal of soil at a permitted facility, installation of monitoring wells, and groundwater sampling.

This cleanup action meets the requirements for Model Remedy 5, in accordance with *Model Remedies for Sites with Petroleum Contaminated Groundwater, Ecology Publication No. 16-09-057 (revised December 2017).* Therefore, a Feasibility Study and Disproportionate Cost Analysis are not required. The requirements of this Model Remedy are:

- Site characterization has confirmed that surface water and sediments have not been impacted by petroleum. Only soils and groundwater have been impacted.
- Method A soil and groundwater cleanup levels are not exceeded beyond the source property boundary.
- Petroleum hydrocarbons consisting of gasoline, middle distillates/oils, or heavy fuels/oils and their constituents are the only contaminants remaining in soil or groundwater.
- Emergency or interim actions are not required due to the lower risk nature of the Site.
- The Site meets the requirements for a TEE exclusion or simplified evaluation.

- The remedial action used for Site cleanup is soil removal, to the greatest extent practicable.
- Method A unrestricted cleanup levels are met throughout the Site in groundwater, and an empirical demonstration has established that Method B soil cleanup levels are appropriate for the Site.
- An institutional control (environmental covenant) is not required on the property.

## 4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site. The cleanup consisted of:

- Decommissioning and removal of two USTs.
- Remedial excavation of approximately 2500 tons of contaminated soil. Excavation depth varied across the Site, with a maximum depth of 16 feet bgs.
- Evaluation of confirmation soil sample results for compliance with the selected cleanup levels, using direct comparison to the selected soil cleanup levels to determine compliance.
- Investigation of groundwater conditions on the Site with the installation and sampling of 22 wells. Direct comparison of the results of groundwater sampling to the selected groundwater cleanup levels was used to demonstrate compliance. Following the removal of source material in soil, much of which was in the saturated zone, no groundwater samples contained contaminants above the applicable cleanup levels.

## **Decommissioning of Resource Protection Wells**

Multiple resource protection wells remain on the parcel of property associated with the Site, primarily to allow for continued monitoring of contamination related to the FMH Material Handling Solutions site. When these resource protection wells are no longer needed, these wells must be decommissioned in accordance with <u>WAC 173-160-460</u><sup>4</sup>. Per <u>WAC 173-160-410</u><sup>5</sup>, resource protection wells include monitoring wells, observation wells, piezometers, spill response wells, remediation wells, environmental investigation wells, vapor extraction wells, ground source heat pump boring, grounding wells, and instrumentation wells.

## Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List and Leaking Underground Storage Tank List.

## 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**:

<sup>&</sup>lt;sup>4</sup> <u>http://apps.leg.wa.gov/wac/default.aspx?cite=173-160-460</u>

<sup>&</sup>lt;sup>5</sup> <u>http://apps.leg.wa.gov/wac/default.aspx?cite=173-160-410</u>

- 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).

#### **Termination of Agreement**

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW3172).

For more information about the VCP and the cleanup process, please visit our <u>VCP webpage</u><sup>6</sup>. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (425) 324-1658 or by email at <u>kim.wooten@ecy.wa.gov</u>.

Sincerely,

Kim Wooten Site Manager Toxics Cleanup Program, NWRO

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

cc: Jerry Sawetz, Riley Group, (<u>JSawetz@Riley-Group.com</u>)
Sonia Fernandez, VCP Coordinator, (<u>sonia.fernandez@ecy.wa.gov</u>)
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<sup>&</sup>lt;sup>6</sup> <u>http://www.ecology.wa.gov/vcp</u>

**Enclosure A** 

Site Description and Diagrams

# **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.

# <u>Site</u>

The Site is defined by soil and groundwater contamination with petroleum and affiliated compounds, including gasoline-range petroleum hydrocarbons (TPHg), diesel-range petroleum hydrocarbons (TPHd), oil-range petroleum hydrocarbons (TPHo), benzene, ethylbenzene, xylenes, lead, cadmium, and polycyclic aromatic hydrocarbons (cPAHs).

The Site is in close proximity to chlorinated solvent-contaminated groundwater associated with the FMH Materials Handling Solutions site (FMH). The source of FMH contamination is on the parcel west of the Site. The sites are not considered to be co-mingled, based on data collected prior to remedial excavations of petroleum-contaminated soil at the Site in 2016. Petroleum-contaminated soil in Area 2 (described in more detail under Extent of Contamination and Remedial Action below) was all located to the north of MW-17. Three groundwater samples from MW-17, collected after the remedial soil excavation, did not have detections of chlorinated solvents, indicating that the FMH groundwater contamination did not extend as far north as MW-17. While more recent groundwater sampling indicates that FMH-related contamination may now extend close to this area, petroleum-contaminated soil was removed prior to the plume reaching this area.

# Area and Property Description

The Site is located within King County Parcel Number 5624200371 (Property), between Seattle and Burien in an area of unincorporated King County known as North Highline (**Figure 1**). The Property is approximately 3.5 acres in size, and is generally triangular in shape with the widest point on the southern edge of the Property. The area around the Property is mostly commercial and industrial businesses. Two commercial buildings are currently located on the Property.

# **Property History and Current Use**

Prior to 1936, the Property housed a single-family residence and agricultural land. A greenhouse and small grocery store were added to the Property in 1948. A second single-family residence was built on the southern part of the Property in 1950, and remained on the Property until recent redevelopment activities. A commercial building was built in the southeastern corner of the Property in 1964, and Dominic's Red Apple Market currently operates in that building (**Figure 2**).

A gas station was developed on the northern part of the Property in 1963. The station remained in operation until the late 1970s, and associated buildings were removed from the Property by 1980. Available information suggests that USTs associated with this gas station were removed in 1986.

The larger commercial building on the western side of the Property was built in 1986. Historical occupants and uses include restaurants, a hair salon, a video store, Rascal's Casino, Maytag Laundromat, office space, and a boxing club. The building was expanded and renovated between 2016 and 2019. Sea Mar Community Health is currently the main occupant of the building. Within the building are a radio station (KKMO, El Rey 1360), office space, a medical clinic, youth boxing club, and the Sea Mar Museum of Chicano/a/Latino/a Culture.

# Sources of Contamination

Ecology received the notification of an UST release on the Property in June 2016, resulting in inclusion of the Site on the Confirmed and Suspected Contaminated Sites List. Contamination on Site can be divided into four areas based on source (**Figure 3**):

- Soil contamination related to a heating oil UST near the former single-family residence (remediation Area 1).
- Soil contamination along the western Property boundary from an unknown source (remediation Area 2). This is the area in close proximity to the FMH site contamination.
- Soil and groundwater contamination in the area of the former gas station (remediation Areas 3, 4, and TP).
- Soil contamination near a probable waste oil UST in the central portion of the Property (remediation Areas 5 and 6).

# **Physiographic Setting**

The Site is located in the Duwamish River Valley adjacent to the west margin of the Valley. The Property is generally level on the northern end and slopes upward on the southern end. The elevation is approximately 20-40 feet above mean sea level (amsl). The surrounding uplands rise to elevations near 500 feet amsl.

# Surface/Storm Water System

The Property lies approximately 1500 feet east of the Duwamish River. There are tributaries to the Duwamish River in the area, including an unnamed drainage tributary located approximately 700 feet northeast of the Property and Hamm Creek approximately 950 feet east of the Property.

A stormwater vault is present underneath the parking lot in the central portion of the Property. It was constructed in 2017. A stormwater pipe runs along S 96<sup>th</sup> St to the north of the Property. Water in the line moves east until it reaches its discharge point into the Duwamish River. Based on its location, the Site is located within what Ecology has designated the Sea King Industrial Park Source Control Area for the Lower Duwamish Waterway.

# **Ecological Setting**

The Site is mostly covered by buildings or paved and includes small landscaped areas. The commercial areas north, west, and east of the Site are similar, with limited areas of landscaping mixed with buildings or paved areas.

South of the Site is a Seattle City Light power line right-of-way. This area is about 100 feet across (north to south). The section between Des Moines Memorial Dr S and 8<sup>th</sup> Ave S is undeveloped, other than the power lines, and vegetated.

The Property Closure Report (Riley 2021) includes documentation that the Site meets the initial TEE exemption criteria. The exemption selected may not be warranted, based on more than 1.5 acres of contiguous undeveloped land present in the Seattle City Light property south of the Property and within 500 feet of the Property boundary. A revised TEE was submitted for the Site on April 5, 2022. The revised TEE confirms that even without an exemption, the TEE is ended for this Site at the Exposure Analysis step of the simplified evaluation, based on the remaining area of soil with petroleum present above background concentrations being less than 350 square feet.

# **Geology**

Generally, the Site is underlain by silty sand. The maximum depth of borings on Site was 15 feet bgs. High amounts of natural organic material were observed in some borings, including a peat layer noted in boring logs for MW-9, -12, and -13. An area of fill with debris mixed in was noted in the north-central portion of the Site, within the area of soil excavated as part of remediation Area 3.

Areas of cement kiln dust (CKD) fill have been documented on the FMH property at depths less than 10 feet bgs. The exact extent of the fill is unknown, but based on available data at the time of a 2015 review of CKD locations (Leidos 2015), it was considered possible that the CKD extended on to the northwest corner of the Property. During investigations on the Property, boring SP-05 and MW-13 were advanced in this area. Neither boring log has indications of CKD.

# **Groundwater**

Twenty-two monitoring wells were installed at the Site during characterization and remedial activities. Many of these wells were decommissioned prior to construction of Property improvements between 2016 and 2019, or destroyed during construction. Eight wells remain accessible for sampling: MW-8, -11, -14, -17A, -18, -19, -20, -21, and -22.

Groundwater is shallow, with depths ranging between approximately 1.5 and 6.5 feet bgs. Groundwater flow is to the north to northeast.

# Water Supply

The Site is connected to public utilities, specifically to the King County Water District 20 drinking water system and Valley View Sewer District. The main source of drinking water for Water District 20 is an intertie to the Seattle Public Utilities system, which sources its water from the Cedar and Tolt Rivers. There are no drinking water wells within 0.5 miles of the Site.

# **Extent of Contamination and Remedial Action**

Multiple areas of contamination with petroleum and affiliated compounds have been identified on the Site (see **Figure 3**). Sampling locations for each area are shown below on **Figures 4 - 9**. Generic references to cleanup levels in this section refer to Method A cleanup levels, as those

were the cleanup levels used during site characterization and at the time of the remedial excavations to determine the area of soil that needed to be removed; these were not the final cleanup levels selected for soil at the Site.

# Area 1: Heating oil UST near former single-family residence

This UST was identified as an environmental concern during the 2007 Phase I Environmental Site Assessment. A groundwater grab sample collected adjacent to the UST as part of the 2007 Limited Phase II Site Assessment confirmed TPHd contamination above Method A cleanup levels. Additional sampling in 2008 and 2016 confirmed that contamination was limited to TPHd in the area immediately surrounding the UST (i.e. samples SP-01 and -02).

The UST was decommissioned in June 2016 as part of the remedial action. Excavation of 250 cubic yards of contaminated soils in this area occurred in June and July 2016. Final excavation depths were between 5 and 11 feet bgs. Soil samples taken from excavation boundaries (number of samples (n)=22) did not contain TPHd above cleanup levels.

After excavation, monitoring well MW-16 was installed in the location of the former UST to assess impacts to groundwater. Groundwater samples collected in July and September 2016 from MW-16 did not indicate contamination above cleanup levels. Additional samples were not collected from MW-16 because the well was damaged in additional construction activities and was not replaced. Groundwater samples collected both before and after the soil excavation was completed from MW-2, -3, and -10, located generally downgradient of Area 1, have not had any contamination above cleanup levels.

# Area 2: TPH along western Property boundary

Sampling was initially conducted along the western Property boundary to evaluate potentially migrating contamination from the FMH site. Soil contamination with TPHd and TPHo above cleanup levels was observed at sampling locations SP-04 and P1. A groundwater grab sample from SP-04 also contained TPHd above cleanup levels.

Excavation of 90 cubic yards of contaminated soil to a final depth of approximately 9.5 feet bgs was performed on June 9, 2016. Confirmation samples (n=21) indicate a successful removal of all soil with TPH above cleanup levels. Following remedial actions, monitoring well MW-17 was installed very close to the location of SP-04. Three quarterly groundwater samples were collected from this well before it was damaged during additional construction activities; none of these samples contained TPHd over cleanup levels.

Additional sampling points along the western Property boundary south of Area 2 indicate contamination with chlorinated solvents in soil, groundwater, and soil vapor above screening or cleanup levels, associated with the FMH site. Groundwater and soil vapor sampling wells remain in place on the western portion of the Property to allow assessment of the FMH contamination in this area.

# Area 3: Former gasoline service station

Site characterization identified contaminants above cleanup levels in soil samples collected at locations B-9 and MW-9. Contaminants included TPHg, TPHd, TPHo, cadmium, lead, and cPAHs in shallow soils (approximately 2 feet bgs). Excavation of 206 cubic yards of contaminated soil to a final depth of 4 - 7 feet bgs was performed in June 2016. Confirmation samples (n=14) were collected from excavation boundaries.

One confirmation sample (3WSW6-6), collected on the western excavation sidewall 6 feet bgs, required additional evaluation to determine compliance with cleanup levels. Results from this sample indicated both petroleum in the TPHg and TPHd ranges of the analysis. There was an overlap in the carbon chain lengths reported for these analyses, however, and so just adding the two values together to get a total TPH value to compare to the Method B cleanup level would have double counted some of the petroleum and resulted in an inaccurate value for total TPH.

A chemist at Friedman & Bruya, the laboratory that did the sample analysis, evaluated the chromatograms from both sample analyses and determined that the petroleum product in the sample was a middle distillate fuel, most accurately quantified in the TPHd results. The TPHg result was reflecting compounds entirely detected in the range overlapping with the TPHd analysis. The TPHd value of 1100 mg/kg from the sample was therefore compared to the cleanup level to determine compliance.

Monitoring wells MW-6 and -9 were located within or downgradient of this area of contamination. Both were sampled before remedial actions and groundwater did not contain TPH or BTEX above Method A cleanup levels. Both of these wells were decommissioned prior to construction. MW-22 was installed in October 2018 to allow for assessment of groundwater downgradient of the remaining area of contamination at location 3WSW6-6. The October 2018 groundwater sample from this well did not contain TPH or BTEX above Method A cleanup levels.

# Area 4: Former gas station dispenser islands

Site characterization identified TPHg (85 mg/kg) and benzene (0.31 mg/kg) above cleanup levels in a soil sample collected 5 feet bgs at location MW-11. Additional areas of TPHg contamination were discovered during remedial activities in June 2016. The final excavation depth was 6 - 16 feet bgs, and 1040 tons of contaminated soil were removed. Confirmation samples (n=52) were collected from excavation boundaries and indicated a successful remedial action.

During site characterization, groundwater samples from MW-7 were contaminated with TPHg and benzene above cleanup levels. This well was decommissioned prior to construction activities, and was not available for sampling following the remedial action. MW-11 and -12, located generally downgradient of MW-7, have both been sampled for four consecutive quarters following remedial actions; no groundwater samples from either well have contained contaminants above cleanup levels.

The empirical demonstration that groundwater is not impacted by current soil conditions on the property is most evident in this Area, based on the results from MW-11. Although the contaminated soil sample at 5 feet bgs is within the saturated zone, no groundwater sample in this well has shown impacts from the remaining TPH and benzene in soil at this location.

## Area TP: Central portion of former gas station

Area TP was investigated during 2016 remedial actions to determine if TPHd and TPHo contamination had migrated under a sewer pipe into this area. A soil sample from location TP-2 contained TPHo over cleanup levels. Excavation proceeded to 6 feet bgs, and a total of 170 cubic yards of soil was removed. Confirmation soil samples (n=11) from excavation boundaries confirmed a successful remedial action.

# Areas 5 and 6: Central portion of Property in stormwater vault excavation

An unexpected 675-gallon UST was discovered, decommissioned, and removed from the Property during excavations for the construction of a new stormwater vault under the parking lot east of the Sea Mar building. Based on samples of sludge and liquid from inside the tank, it was classified as a waste oil UST. Soil contamination included TPHg near the UST (Area 6) and a smaller area of TPHo and cPAH contamination (Area 5).

Groundwater encountered in the excavation and groundwater removed during dewatering for vault construction were both sampled, and did not contain any contaminants above cleanup levels. Soil excavation extended to 4 feet and 8 feet bgs in Areas 5 and 6, respectively. A total of 299 cubic yards of soil was removed. Confirmation soil samples (n=18) from remedial excavation boundaries confirmed a successful remedial action.

Site Diagrams



Figure 1. General location of the Site. From King County iMap.



**Figure 2.** Layout of buildings on Site prior to redevelopment. Areas of interest for former gas station and adjacent cleanup site are noted on the north and west sides of the Property, respectively. Soil boring and monitoring well locations are from site characterization activities conducted from 2008-2016. Figure from Riley (2016) Phase II Subsurface Investigation.



**Figure 3.** Location of all areas of contamination and buildings on the Property following redevelopment. Figure also shows some locations associated with sampling for the FMH site, which are not discussed in this opinion letter text. Figure from Riley (2021) Property Closure Report.



**Figure 4.** Sampling results from Remediation Area 1, near the former single-family residence. Figure from Riley (2017) Remedial Investigation/Feasibility Study and Remedial Action Report.



**Figure 5.** Sampling results from Remediation Area 2, along the western Property boundary. Figure from Riley (2017) Remedial Investigation/Feasibility Study and Remedial Action Report.



**Figure 6.** Sampling results from Remediation Area 3, in the northern part of the Property near the former gas station. Figure from Riley (2017) Remedial Investigation/Feasibility Study and Remedial Action Report.



**Figure 7.** Sampling results from Remediation Area 4, in the northern part of the Property near the former gas station. Figure from Riley (2017) Remedial Investigation/Feasibility Study and Remedial Action Report.



**Figure 8.** Sampling results from Remediation Area TP, in the northern part of the Property near the former gas station. Figure from Riley (2017) Remedial Investigation/Feasibility Study and Remedial Action Report.



Figure 9. Sampling results from Remediation Areas 5 and 6, in the stormwater vault excavation in the central part of the Property.

Figure from Riley (2017) Underground Storage Tank Closure and Remedial Action Report.

**Enclosure B** 

Basis for the Opinion: List of Documents

- 1. The Riley Group. April 5, 2022. Terrestrial Ecological Evaluation Form. [revised]
- 2. The Riley Group. November 29, 2021. *Property Closure Report, Sea Mar Community Health Center.*
- 3. The Riley Group. January 14, 2021. *Well Installation and Environmental Consulting Services Report, SeaMar Community Health Centers.*
- 4. The Riley Group. November 20, 2020. *Vapor Intrusion Assessment Report, Sea Mar Community Health Center.*
- 5. The Riley Group. September 29, 2020. 3<sup>rd</sup> Quarter 2020 Groundwater Monitoring *Report, Sea Mar Community Health Center.*
- 6. The Riley Group. September 12, 2017. 2017 Underground Storage Tank Closure and Remedial Action Report, Sea Mar Community Health Center.
- 7. The Riley Group. May 15, 2017. 1<sup>st</sup> Quarter 2017 Groundwater Monitoring Report, Sea Mar Community Health Center.
- 8. The Riley Group. March 13, 2017. *Remedial Investigation/Feasibility Study and Remedial Action Report, Sea Mar Community Health Center.*
- 9. The Riley Group. January 11, 2017. 4<sup>th</sup> Quarter 2016 Groundwater Monitoring Report, Sea Mar Community Health Center.
- 10. The Riley Group. October 27, 2016. 3<sup>rd</sup> Quarter 2016 Groundwater Monitoring Report, Sea Mar Community Health Center.
- 11. The Riley Group. August 17, 2016. 2<sup>nd</sup> Quarter 2016 Groundwater Monitoring Report, Sea Mar Community Health Center.
- 12. The Riley Group. March 28, 2016. *Phase II Subsurface Investigation, Dominic's Plaza (SeaMar Community Health Centers).*
- 13. The Riley Group. March 14, 2016. *Phase I Environmental Site Assessment, Dominic's Plaza.*
- 14. Leidos. April 2015. Lower Duwamish Waterway Cement Kiln Dust: Summary of Existing Information. Available online: <u>https://fortress.wa.gov/ecy/gsp/DocViewer.ashx?did=46145</u>
- 15. The Riley Group. January 30, 2008. Supplemental Phase II and Geophysical Survey, Dominic's Plaza.
- 16. The Riley Group. November 12, 2007. *Geophysical Survey & Limited Phase II Subsurface Investigation Letter Report, Dominic's Plaza.*
- 17. The Riley Group. October 10, 2007. *Phase I Environmental Site Assessment, Dominic's Plaza Commercial Center.*