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VIA E-MAIL NOPE461@ECY.WA.GOV

Mr. Norman Peck
Site Coordinator
Department of Ecology
3190 160th Avenue S.E.
Bellevue, Washington 98008-5452

RE: Lot 13, Ross Plaza, South 234th Street and Pacific Highway, Federal Way,
Washington-STS Project No. 29957-XH

Dear Mr. Peck:

This letter is to keep you advised of our progress in the environmental assessment and remediation of the contamination previously identified at the Ross Plaza Shopping Center. Our previous correspondence dated, September 9, 1998, described the proposed site investigation of the petroleum contamination at the former gas station parcel which is now occupied by a SeaFirst Bank. We proposed to collect soil samples from the depth interval which in prior sampling had exhibited exceedances of the MTCA Method A standards. Additionally, we proposed to resample the monitor wells, which were in the vicinity of the soil exceedance, to assess possible water quality exceedances. Those wells had not previously shown any exceedances of MTCA water quality standards.

In preparing for the site work, our contractor visited the site to lay out the boring locations for utility clearance, and develop and sample the wells. That site visit on Thursday, September 5, 1998, found the wells in the vicinity of the SeaFirst Bank had been decommissioned, and sealed with concrete. They are no longer available to sample.

We reviewed the original data and found that the one groundwater sample, which had an exceedance of the MTCA standard, was not collected from a monitor well, but was



collected from soil boring B-4 without installing or developing a proper monitoring well. One soil sample from that boring showed elevated TPH-Gasoline indications, measuring 410 parts per million WTPH-G. The water sample from that boring showed 1.9 ppm TPH-G, only slightly above the 1.0 ppm threshold. It is suspected that the elevated TPH-G in the water is an artifact of suspended soil and not representative of the actual water quality which would be recovered from a properly installed and developed well.

As in our previous proposal, we expect to collect new soil samples in the immediate vicinity and depth of the one which originally showed elevated TPH-G concentrations. Samples will be analyzed for TPH-G/BTEX and volatile petroleum hydrocarbons (VPH). A MTCA Method B interim method calculation will be conducted to determine whether or not the concentrations are within acceptable levels under state regulation.

The Method B interim method evaluates the potential for acute or chronic health effects from direct exposure and the potential for movement of contaminants from soil to groundwater. Since we anticipate the sample to represent the worst case conditions on the property, soil to groundwater partitioning calculations following Raoult's law will also provide a worst case potential for contamination of groundwater by petroleum fractions from this soil.

In the event this analysis shows no potential for exceeding the groundwater standard based on the measured VPH surrogate concentrations in the soil, we would propose to seek closure without further groundwater testing.

Please review our proposal for this change in approach, given the change in conditions at the site from what was expected. We are anxious to keep you informed of our progress and at the same time try to avoid installing wells and the expense of sampling and closing them if there is sufficient data available from the soil samples we will collect.

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Thank you for your attention to this matter. I will follow up this e-mail with a hard copy of this letter. I would appreciate your reply by either e-mail or regular mail.

Sincerely,

STS CONSULTANTS, LTD.

A handwritten signature in dark ink, reading 'Richard G. Berggreen', with a long horizontal flourish extending to the right.

Richard G. Berggreen, C.P.G.
Principal Geologist

BERGGREEN@STSLTD.COM

cc: Kevin Connor, JDI Realty