

December 8, 2020

Ms. Louise Bardy
Toxics Cleanup Program - Northwest Regional Office
Washington State Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452

Subject: Release Notification
Former Coastal Gasoline Station
3317 Auburn Way North, Auburn, Washington

Dear Ms. Bardy:

On behalf of the current property owner (Sunset Auburn, LLC), this letter reports the discovery of a hazardous substance release (a methane hazard) at the aforementioned property that may pose a threat to human health and the environment. The current owner purchased the property in 2019, and recently discovered this historical release from a former gasoline station. Details about the release are summarized below per Model Toxics Control Act (MTCA) reporting requirements in WAC 173-340-300 and Washington State Department of Ecology (Ecology) Toxics Cleanup Program Policy 300. A summary of key results related to the release is presented in the attached Figure 1. Upon discovery of the release, the property owner quickly responded with the mitigation measures described below. This property is not currently in the Ecology Cleanup Site database.¹

The following information is provided per Section 7 of Toxics Cleanup Program Policy 300:

A. Property Owner

Sunset Auburn, LLC
910 Traffic Avenue, Sumner, WA 98390
Attention: Phil Mitchell
Phone: (253) 826-6997

B. Property Location

3317 Auburn Way North, Auburn, WA 98002

C. Hazardous Substances Released

Elevated soil gas methane concentrations are present in portions of the 3317 Auburn Way North parcel as a result of a gasoline release from a former Coastal gasoline station that operated between approximately 1969 and 1985.² The gasoline release was most likely exacerbated by demolition of the former station by the previous owner between 1985 and 1986. Furthermore, the hazards associated with the gasoline release were substantially increased by the 1986 construction of the current 3317 Auburn Way North building directly over impacted soil and groundwater

¹ This property is in the Facility/Site database as Auburn Valley Mazda (# 68239768) for hazardous waste generation between 1992 and 2003, which is likely unrelated to the release discussed in this letter.

² Historical research has verified that Coastal Oil Corporation is the likely operator of this former station.

within and surrounding the former gasoline station footprint. Since that time, natural bacterial degradation of the gasoline release under the building and surrounding paved areas has caused soil gas methane to accumulate at concentrations exceeding 30% in some locations. Based on the American Society of Testing and Materials Designation E2993-16, these soil gas methane concentrations pose a potential methane explosion hazard. Of particular concern is the presence of methane soil gas concentrations on the order of 90% to 100% at five sampling locations. Fortunately, current indoor air and ambient air methane concentrations in and around the affected areas are less than 0.01%.³ However, if a significant foundation slab or pavement crack were to develop in the future (e.g., from construction activities or an earthquake) and an ignition source was present (e.g., a lit cigarette), a methane explosion could potentially occur. A summary of the methane soil gas concentrations and total petroleum hydrocarbons in the gasoline range (TPH-G) soil and groundwater concentrations is presented in the attached Figure 1.

D. Circumstances of the Discovery of the Release

The potential methane explosion hazard is the potential threat to human health and the environment that predicated submitting this release notification to Ecology. Field investigation of the gasoline release was initiated in 2019, and efforts to fully characterize the nature and extent of gasoline impacts are ongoing. Methane was unexpectedly encountered in a soil gas result and an ambient air result obtained in August 2020 as part of an initial vapor intrusion investigation of the gasoline release, and was identified as a potential issue. As a result, an extensive field investigation that obtained real-time field methane measurements was conducted on September 16, 2020. Nearly 100 soil gas, indoor air, and ambient air methane concentrations were measured at a variety of locations (including potential worst-case locations) within and surrounding the 3317 Auburn Way North building. The nature of the potential methane explosion hazard was realized during the September 16, 2020 investigation activities.

Controls have been implemented to mitigate the potential methane explosion hazard, additional investigation activities are being planned, and cleanup actions will be evaluated following additional investigation activities. The eastern portion of the 3317 Auburn Way North building (i.e., the diamond-shaped portion of the building shown in Figure 1) was evacuated prior to the September 16th sampling event. This portion of the building has been locked and will remain unoccupied until the potential methane explosion hazard is adequately controlled. A car barricade, flagging, and warning signs have also been placed around this portion of the building to further discourage entry into the building and smoking around the building. Likewise, car barricades, flagging, and warning signs have been placed around the two outdoor paved locations where soil gas methane concentrations exceed 30%. In addition, precautions (e.g., use of fans and non-sparking tools) will be implemented for subsurface activities (e.g., drilling). Additional investigation activities are being planned to better understand the gasoline source areas and determine an appropriate interim action for addressing the potential methane explosion hazard and the gasoline source areas that are causing the potential methane explosion hazard. Report(s) will be prepared and submitted to Ecology in the future to document investigation and cleanup action activities and results associated with the potential methane explosion hazard, the gasoline contamination, and other contamination on the property.

³ An indoor air methane concentration of less than 0.01% (or 100 parts per million) is the most favorable indoor air criterion in American Society of Testing and Materials Designation E2993-16.



Please contact me at (360) 570-1700, or Kim Seely at (253) 203-6820, if you have any questions about this letter.

Respectfully,

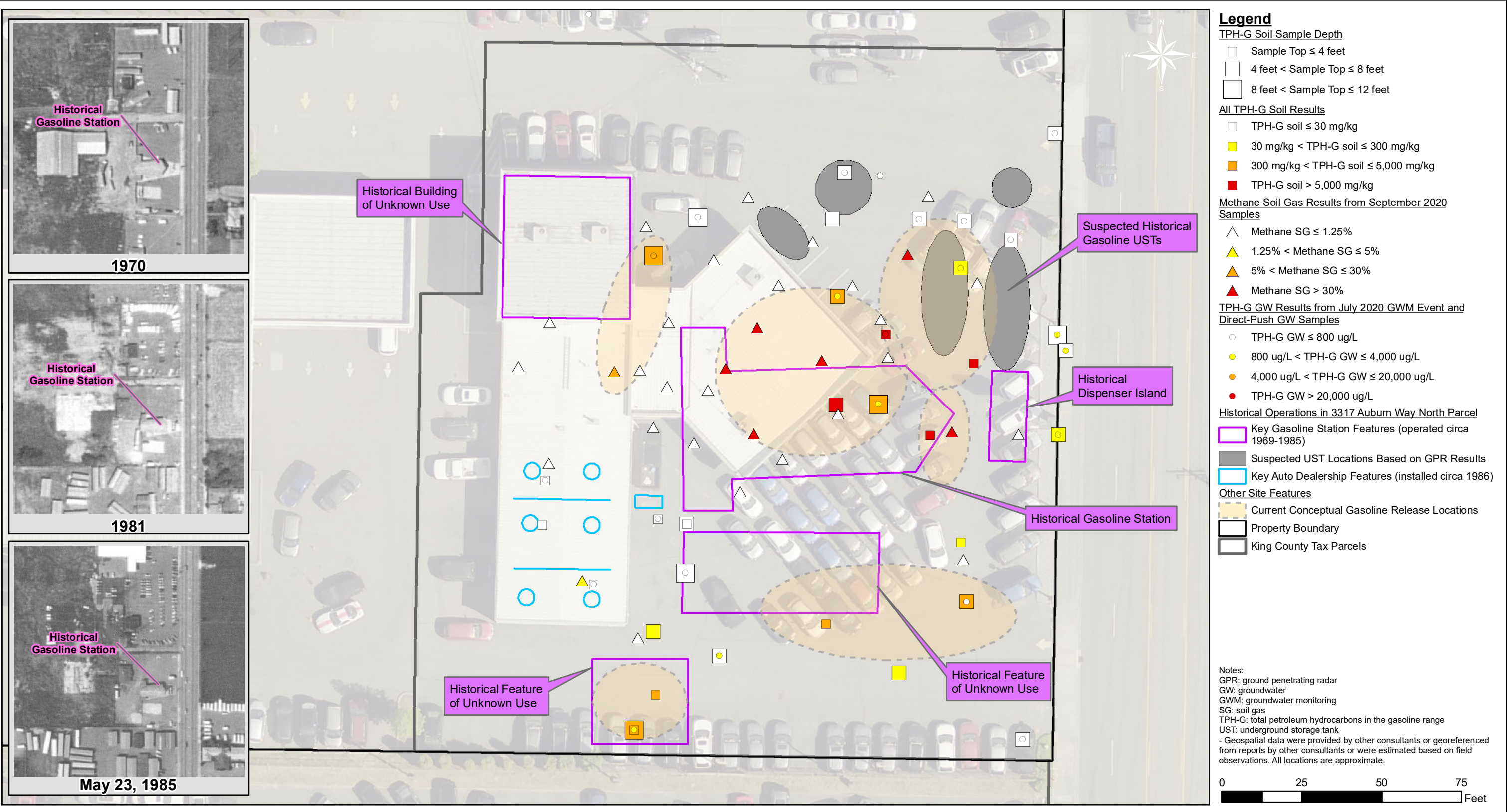
A handwritten signature in blue ink that reads 'Troy Bussey Jr.'.

Troy Bussey Jr., P.E. (WA, CA, NC, SC), L.G. (WA, CA, NC, SC), L.H.G. (WA)
Principal Engineer

Attachment: Figure 1 – Summary of Gasoline and Methane Impacts in 3317 Auburn Way North Parcel

cc: Donna Musa, Ecology (electronic copy only)
Phil Mitchell, Sunset Auburn, LLC (electronic copy only)
Cristi Acuna, Sunset Auburn, LLC (electronic copy only)
Kim Seely, Coastline Law Group (electronic copy only)
Greg Jacoby, McGavick Graves (electronic copy only)

Document Path: G:\Projects\Coastline Law\Sunset Auburn Maps\Dec\Fig_1_Summary of Gasoline and Methane Impacts.mxd; Author: VN; Date Saved: 12/7/2020



Summary of Gasoline and Methane Impacts in
3317 Auburn Way North Parcel
Former Coastal Gasoline Station

Figure 1