From: Warfel, Michael (ECY)
To: Andrew Kaparos
Cc: Jim Maul; Carolyn Wise
Subject: RE: VSF Properties, North Cascade Ford - FS Addendum
Date: Tuesday, November 13, 2018 10:14:00 AM

Hello All:

The report was received and successfully downloaded. Please submit one hard copy of this report to my attention at Ecology; regular mail is OK.

Ecology appreciates the recent significant progress towards cleanup for this Site, as reflected in our meeting in Bellevue on October 23 and the recent report received via email by Ecology (*Feasibility Study Addendum*, dated October 31, 2018). However,
Ecology needs the following additional information to support your request, which is consistent with the Ecology RI and FS checklists (see https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process/Cleanup-options/Voluntary-cleanup-program/Reporting-requirements):

- A summary table of all subsurface explorations, including date, consulting firm, drilling method, total depth, types of samples collected (soil, groundwater), monitoring well screen intervals, and report references for geologic log and sample results.

- AOC Maps (AOCs 1 through 4) for each Chemical of Concern (COC) group by media (soil and groundwater) that show the estimated aerial extent of concentrations > MTCA, including data collected on BNSF property:
    - TPH-G, TPH-D, TPH-O, and BTEX
    - Metals
    - PAH and PCB

- Show the estimated vertical extent of soil and groundwater concentrations > MTCA on geologic cross sections A-A' and B-B' from the 8/17/2018 *Conceptual Site Model* memo.

- Additional items to support a Property NFA Likely and a future Property Environmental Covenant:
    - Details of Selected Remedies
        - AOC 1
            - A barrier along the northern property boundary is needed to prevent recontamination of groundwater, which flows to the southwest. Soil and groundwater with TPH > MTCA on BNSF property will continue to contribute contamination to groundwater flowing beneath the property. See *"Guidelines for Property Cleanups under the Voluntary Cleanup Program," Ecology Publication No. 08-09-044, Revised July 2015*; search the document for "recontamination."
            - Provide documentation of BNSF refusal to grant access to their property for cleanup of soil and groundwater contamination that

originated on the Property.

- AOC 2
    - Extend cross section B-B' from the 8/17/2018 *Conceptual Site Model* memo southward (with soil and groundwater chemical data), to confirm that soil and groundwater concentrations > MTCA do not extend into the Ferry Street right-of-way.
- AOC 3
    - The selected cleanup alternative needs to be documented by the soil and groundwater COC maps, showing absence of groundwater impacts from soils.
- AOC 4
    - Two additional quarters of ground water sample results from monitoring well MW03 are needed to confirm that the following COCs are below MTCA Method A ground water cleanup levels for four quarters: TPH-G, benzene, toluene, ethylbenzene, and xylenes. Data from two quarterly events (5/15/2012 and 10/9/2012) were provided in reports submitted to Ecology.

- A summary table by AOC of the cleanup alternatives evaluated, with a brief description of the components.
- A cost-benefit summary table (showing the rankings for all factors) and graph for the Disproportionate Cost Analysis (DCA), to clearly document with selection of the preferred cleanup alternatives.

Finally, after the previous information has been provided to Ecology, please email a signed VCP opinion form to me regarding the request for Ecology to consider a Property NFA Likely Opinion. Here is the link to the form:
https://fortress.wa.gov/ecy/publications/SummaryPages/ecy070219.html .

Again, Ecology appreciates your progress on Site cleanup, and I am ready to review your request as soon as this information is received.

Michael R. (Mike) Warfel, LG, LHG, RG
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From: Andrew Kaparos [mailto:akaparos@maulfoster.com]
Sent: Wednesday, October 31, 2018 2:09 PM
To: Warfel, Michael (ECY) <MWAR461@ECY.WA.GOV>
Cc: Jim Maul <jmaul@maulfoster.com>; Carolyn Wise <cwise@maulfoster.com>

Subject: VSF Properties, North Cascade Ford - FS Addendum

Good afternoon, Mike and Happy Halloween!

Thanks again for meeting with Jim and I last week; it was very helpful! The FS Addendum has been updated and finalized, as we discussed. The updated conceptual site model (with updated TEE) is provided as Appendix C.

Due to the large file size, we are not able to transmit via email. You can access the report at MFA's FTP site (access instructions below). Please note, the PDF has bookmarks to help you navigate between the report and appendices.

1. Go to http://ftp.maulfoster.com/
2. You will then be prompted for the following Logon ID and password.
    a. Login ID: 0747.01
    b. Password: 817TdjqX

Please let us know if you have any questions or comments.

Thank you,

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