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December 16, 2022

Washington State Department of Ecology
NWRO Toxics Cleanup Program
Attn: Jing Song
Site Manager
PO Box 330316
Shoreline, WA 98133

SUBJECT: *RESPONSE TO OPINION ON PROPOSED CLEANUP OF FORMER SUNS MINI MART AND GAS SITE; 9506 19TH AVENUE SE, EVERETT, WASHNGTON*

Facility ID #56571915
VCP Project # NW3317
Cleanup Site ID # 12382
Release ID #592193

Dear Ms. Song,

This letter presents responses to an opinion letter that was prepared by the Washington State Department of Ecology (Ecology), dated March 15, 2022. The opinion letter documents Ecology's comments to a Cleanup Action Plan (CAP) which was prepared by Galloway Environmental, Inc. (GEI), dated April 27, 2021. The purpose of this letter is to provide responses to certain aspects of Ecology's opinion letter, as outlined below.

The responses, contained herein, are intended to provide clarification to Ecology with regards to technical aspects of the CAP as well as the overall goals of the responsible party (CHJ Properties) and its representatives.

1.a. Soil contamination characterization:

Ecology Comment: Ecology states that additional soil sampling is needed to define lateral and vertical extents of soil contamination, including:

- Lateral extent to east, northeast, south, and west
- Vertical extent in the former dispenser island area, below 10 feet bgs

Response #1: CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. The primary objective is to target the source area (tank pit), with special consideration to the tank pit area. GEI and CHJ Properties understand that further assessment may be necessary during/after the planned remedial action.

1.b. Groundwater contamination characterization:

Ecology Comment: Ecology states that additional monitoring wells are needed to delineate the extent of contaminated groundwater plume and potential LNAPL plume, including:

- Monitoring wells to the north, west, and east/northeast of monitoring well GMW-4 and soil boring B-4 to evaluate and delineate groundwater plume and potential LNFPL plume in the former gasoline UST area and project trench area.

Response #1: Monitoring well GMW-3 was installed northeast of GMW-4. Monitoring well GMW-2 was installed north of GMW-4. We propose addressing Ecology's comment by installing an additional monitoring well west of GMW-4, in the central position of the former UST area. The well would be converted from the 8 inch diameter well that is planned to be installed in the former UST area (see Section 10.1 of the CAP) to remove LNAPL.

- Monitoring wells to the east and northeast of monitoring well GMW-3 and soil boring GL-B-10 to delineate groundwater plume in the eastern and northeastern areas of GMW-3 and soil boring GL-B-10.

  Response #1: As noted above, CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. We understand that further assessment may be necessary during/after the planned remedial action, including installing monitoring wells east and northeast of monitoring well GMW-3.

- Monitoring wells to the north of monitoring well GMW-2 to delineate groundwater plume in the northern area of GMW-2.

  Response #1: Monitoring well GMW-1 was installed northeast (downgradient) of GMW-2. Therefore, it is our opinion that monitoring well GMW-1 satisfies this data gap.

  Response #2: Laboratory analytical results of groundwater samples that were collected from GMW-1 have resulted in non-detectable concentrations of the constituents of concern. Because GMW-1 is considered to be in the most downgradient position, with respect to groundwater flow, additional wells in the vicinity of GMW-1 are not likely beneficial.

- Monitoring wells to south of the former UST area to delineate groundwater plume in the southern area of the former UST area.

  Response #1: As noted above, CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. However, they understand that further assessment may be necessary during/after the planned remedial action.

- At least one monitoring well on the southwestern portion of the site to evaluate groundwater conditions in the former waste oil UST area.

  Response #1: As noted above, CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. However, they understand that further assessment may be necessary during/after the planned remedial action.

- Please construct new monitoring wells so the seasonal high water table is not above the top of the well screens.

  Response #1: As noted above, CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. However, they understand that further assessment may be necessary during/after the planned remedial action.

- All monitoring wells, including the existing monitoring wells and the newly installed monitoring wells should be surveyed to North American Vertical Datum of 1988 instead of an arbitrary datum.

  Response #1: Concur. This will be completed during subsequent actions at the site.

1.c. Site hydrogeology characterization:

Ecology Comment: Ecology states that additional monitoring wells and groundwater monitoring is needed to characterize site hydrogeology. Specifically, Ecology states that the following is needed:

- Obtain geological information throughout the site and evaluate how it impacts presence of groundwater.

  Response #1: Geological information was summarized in previous environmental reports, including the April 28, 1992 report by EMCON Northwest and the September 6, 2016 report by G-Logics. Does Ecology request additional discussions regarding the geological information in the CAP?

- Evaluate groundwater depths throughout the site, either in glacial till or the glacial outwash.

  Response #1: This was included in the September 6, 2016 report by G-Logics. Does Ecology request additional discussions regarding the geological information in the CAP?

- Assess the continuity of perched groundwater and the underlying water table and determine if they are separate hydrogeologic units.

Response #1: According to a well log for the apparent nearest underlying water table, a well was installed on June 29, 1956 for Snohomish County near the intersection of Burley Drive and Gobun Lane (approximately 0.4 miles east/northeast of the site) where the underlying groundwater was observed to be approximately 238 feet bgs. Based on this information, the perched groundwater is presumed to be considerably higher and discontinuous from the underlying groundwater table.

- Determine the predominant flow directions and seasonal variations of groundwater at the site.

  Response #1: This was defined by G-Logics in their investigative work during 2015 and 2016 which the predominant groundwater flow to the northeast (see Section 5.2.2 of the G-Logics report, dated September 6, 2016.

1.d. Vapor intrusion (VI) evaluation:

Ecology Comment: A Tier 1 VI evaluation is needed for the site building.

Response #1: Concur. This will be done after the next round of site work (remediation).

1.e. Additional analysis for waste oil UST:

Ecology Comment: Future selected soil samples from the former waste oil UST area should be tested at least for TPH-G, TPH-D, TPH-O, BTEX, naphthalene, cPHAs, and lead. Future selected groundwater samples from the former waste oil UST area should be tested at least for TPH-G, TPH-D, TPH-O, VOCs, naphthalene, cPHAs, and lead.

Response #1: Concur. This will be done during the remedial activities.

1.f. Site cleanup or property-specific cleanup:

Ecology Comment: Please clarify if you are conducting a property-specific cleanup.

Response #1: After the date of publication of the CAP, CHJ Properties have accepted responsibility for investigating and remediating the site in pursuit of a site-specific NFA, rather than a property-specific NFA which was their initial intention. Therefore, subsequent investigations may be conducted to investigate the extent of contamination at the site, including contamination outside the property boundary. If off-site investigations are conducted (e.g., within the public right of ways), this will likely occur after initiating the remedial action within the property boundaries. As noted above, CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. The primary objective is to target the source areas, with special consideration to the tank pit area. CHJ Properties understand that further assessment may be necessary during/after the planned remedial action.

1.g. Reports and additional data submittal:

Ecology Comment: A comprehensive report, such as a RI report or equivalent is needed to summarize site characterization data.

Response #1: The CAP includes all relevant information that is required in an RI report including, but not limited to, the predominant site conditions, nature of contamination, and proper path forward to remediating the site. Please clarify if Ecology requires an RI report to be prepared prior to initiating the site remediation.

Ecology Comment: The vertical scale of the cross-section should be referenced to NAVD88.

Response #1: Concur. This will be included in subsequent reporting after the site is re-surveyed by a licensed land surveyor.

Ecology Comment: Groundwater contour maps and a Rose Diagram are needed to document groundwater flow directions and seasonal variations. See the RI Checklist for guidance on RI report contents.

Response #1: Concur. A contour map was provided in the 2016 report by G-Logics. However, an updated contour map will be generated in subsequent reporting after the site is re-surveyed by a licensed land surveyor.

Response #2: The RI Checklist does not specify the need to prepare a Rose Diagram for groundwater elevations and flow. Please specify if Ecology requires a Rose Diagram to be prepared.

Ecology Comment: Please complete TEE form for Ecology's review.

Response #1: Concur. Please see attached.

Ecology Comment: Please submit all sampling data collected in and post 2005 into Ecology's EIM database.

Response #1: Concur. The data will be uploaded periodically throughout the duration of the cleanup activities.

Ecology Comment: Future reports that contain geological/hydrogeological descriptions and interpretations need to be submitted under the seal of an appropriately licensed professional.

Response #1: Concur.

2. Establishment of cleanup standards:

Ecology Comment: Ecology presents information regarding cleanup levels and points of compliance, relevant to the cleanup levels. Specifically, Ecology states the following:

- MTCA Method A Cleanup Levels are appropriate for site soil. The points of compliance for attaining cleanup levels are site-wide throughout the soil profile and may extend below the water table.

  Response #1: Concur. The planned cleanup levels are included in Section 7.0 of the CAP.

- MTCA Method A Cleanup Levels are appropriate for site groundwater. The points of compliance for attaining cleanup levels are site-wide throughout the saturated zone.

  Response #1: Concur. The planned cleanup levels are included in Section 7.0 of the CAP.

- MTCA Method B Sub-slab soil gas screening levels and groundwater screening levels are appropriate for assessing the VI pathway at the site. The MTCA Method B indoor Cleanup Levels are appropriate for potential future indoor and ambient air samples collected at the site. The points of compliance for air is in the ambient air throughout the site.

  Response #1: Concur. A VI assessment will be conducted during/after the initial remedial action.

3. Selection of cleanup action:

Ecology Comment: Ecology comment regarding the selection of the cleanup method. Specifically, Ecology states the following:

- Further site characterization is needed before selecting the appropriate cleanup action. Ecology recommends submitting a work plan for further site characterization to ensure sufficient data is collected to support cleanup action selection. The process for evaluation and selection of cleanup actions should be completed though a FS.

  Response #1: Concur. Further site characterization would be helpful in defining the lateral and vertical extents of contamination. However, as noted above, CHJ Properties would like to address residual site contamination as quickly as possible to reduce/minimize continued migration of contaminants that were left in place by the historic property owner. CHJ Properties understand that further assessment may be necessary during/after the planned remedial action.

  Response #2: The CAP was prepared to outline the scope of work and methodologies for addressing residual contamination at the site. However, to ensure the completeness and applicability of the plan, the CAP incorporates all of the requirements of a FS. Please specify if a FS is required prior to implementing the remedial action.

In summary, GEI and CHJ Properties appreciate all of the attention and detail that Ecology took in reviewing and commenting on the CAP. We understand that further assessment would be preferred to further define the lateral and vertical extents of contamination. However, as summarized in the 2016 report by G-Logics, between 1992 and 2016 numerous environmental samples were collected throughout the property at more than 60 boring/well locations. Based on their review of the accumulated data, G-Logics defined the lateral and vertical extents of contamination, as shown in their report figures (i.e., Figure 4, 4a, 4b, 6, and 6a).

CHJ Properties would like to address the source areas of contamination as quickly as possible to reduce the source of contamination and minimize continued migration of contaminants that was left in place by the previous property owner. It is understood that further assessment may be necessary in the future. And some of the recommendations by Ecology, such as installation of additional groundwater monitoring wells, may be conducted in conjunction with the planned remedial action, thereby reducing overall project costs and minimizing the ecological footprint of the project.

Therefore, GEI and CHJ Properties respectfully requests Ecology to re-examine the historic reports and the CAP to determine if further characterization of the site is required prior to implementation of the proposed remedial action.

If you have any questions regarding this submission, please contact me any time at (425)894-8607 or dylan@gallowayenvironmental.com.

Sincerely,

Dylan Galloway, REA
GALLOWAY ENVIRONMENTAL, INC.

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