Electronic Copy

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

January 6, 2023

Tammy Buyok
Multicare Medical Center
315 Martin Luther King Jr Way
MS 315 C4-AD
Tacoma, WA 98405
(tbuyok@multicare.org)

RE: No Further Action opinion for the following contaminated Site

Site name:	Payless Auto Mart (Multicare Federal Way Emergency Center)
Site address:	29805 Pacific Hwy S, Federal Way, WA 98003
Facility/Site ID:	7222592
Cleanup Site ID:	5427
VCP Project No.:	NW3270

Dear Tammy Buyok:

The Washington State Department of Ecology (Ecology) received your request for an opinion regarding the sufficiency of your independent cleanup of the Payless Auto Mart facility (Site) under the Voluntary Cleanup Program (VCP).[1]. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.[2]

Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC[3] (collectively called "MTCA").

[1] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305
[3] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340

Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons as gasoline (TPH-G), diesel (TPG-D), and oil (TPH-O), arsenic, cadmium, total chromium, lead, dieldrin, and 1,1,2,2-tetrachloroethane into Soil.
- Acrolein, 1,3-butadiene, benzene, chloroform, ethylene dibromide (EDB), naphthalene, tetrachloroethylene (PCE), and trichloroethylene (TCE) into Soil Vapor and Air.

Enclosure A includes Site description, history, and diagrams.

Please note the parcel(s) of real property associated with this Site are also located within the projected boundaries of the Asarco Tacoma Smelter Site facility (CSID 3657). At this time, Ecology has no information indicating that contamination from the Asarco Tacoma Smelter Site affects those parcel(s). This opinion does not apply to any contamination associated with the Asarco Tacoma Smelter Site facility.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in **Enclosure B**.
You can request these documents by filing a records request.[4] For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040.
Before making a request, check whether the documents are available on the Site web page[5]

This opinion is void if any of the information contained in the 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. Ecology bases its conclusion on the following analysis:

[4] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[5] https://apps.ecology.wa.gov/cleanupsearch/site/5427

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. **Enclosure A** describes the Site. An initial Site assessment completed in 1992 and 1993, during removal of two underground storage tanks (USTs), identified petroleum impacts to soil. Subsequent Site characterization completed from 2000 through 2022 documented the nature and extent of suspected or confirmed contaminant impacts to soil, groundwater, and air.

Setting cleanup standards

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

Cleanup Levels

Soil

The Site qualifies for a Simplified Terrestrial Ecological Evaluation (TEE), in accordance with WAC 173-340-7492. Therefore, soil cleanup levels protective of terrestrial species are not necessary for this Site.

The soil-to-groundwater pathway is not present at the Site due to the absence of groundwater (see below); therefore, Method B soil cleanup levels for the Site, based on protection of direct contact, are appropriate.

Groundwater

A Site boring and monitoring well drilled to a total depth of 110 feet below ground surface (bgs) in 2017 did not encounter groundwater (see **Enclosure B**). Therefore, the soil-to-groundwater exposure pathway is not present at the Site.

Air

Air cleanup levels are considered necessary to protect against vapor intrusion (VI) into existing buildings. Method B air cleanup levels and VI screening levels are appropriate to assess the VI and air exposure pathways.

Points of Compliance

Soil

The point of compliance for soil at the Site for protection of direct contact from ground surface to 15 feet bgs.

Air

The point of compliance for air is ambient air throughout the Site.

Selecting the cleanup action

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site. The cleanup action selected for the Property consisted of the following elements:

- Decommissioning of USTs formerly used to store gasoline and diesel, including excavation and disposal of associated contaminated soil; and

- Identification of additional contaminated soil associated with former automobile repair operations, equipment rental activities, contaminated fill, and a greenhouse on the Site, followed by excavation and disposal of the impacted soil during Property redevelopment.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site. The cleanup consisted of the following activities:

- Removal of five USTs;
- Excavation and off-Site disposal of approximately 270 cubic yards of contaminated soil during UST removal;
- Excavation and off-Site disposal of approximately 1,660 cubic yards of contaminated soil during construction of the emergency care facility that currently occupies the Property; and
- Collection of confirmation soil and soil vapor samples, to document compliance with MTCA soil cleanup levels and concentrations below vapor intrusion screening levels, as discussed in detail in **Enclosure A**.

Decommissioning of Site monitoring wells

You must decommission resource protection wells[6] installed as part of the remedial action that are not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.[7]

Listing of the Site

Based on this opinion, Ecology will update the Site status as "No Further Action" on the Confirmed and Suspected Contaminated Sites List and the Leaking Underground Storage Tanks List.

Limitations of the Opinion

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**:

- 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).[8]

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[9] and WAC 173-340-545.[10]

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).[11]

---

[6] https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410
[7] https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460
[8] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040
[9] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080
[10] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545
[11] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3270.

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 425-324-1892 or email at michael.warfel@ecy.wa.gov.

Sincerely,

Michael R. Warfel
VCP Site Manager
Toxics Cleanup Program, NWRO

Enclosures (2):

A – Site Description, History, and Diagrams
B – Basis for the Opinion: List of Documents

cc: Tim Crump, TGE Resources, Inc. (tecrump@tgeresources.com)
Kristi Barnette, TGE Resources, Inc. (kristib@tgeresources.com)
Curtis Nelson, Niklexi LLC (Property Owner) (curt@wirbinc.com)
Sonia Fernandez, Ecology VCP Coordinator (sonia.fernandez@ecy.wa.gov)
Tra Thai, TCP Operating Budget Analyst (tra.thai@ecy.wa.gov)

Enclosure A

Site Description, History, and Diagrams

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms part of the basis for the opinion expressed in the letter.

Site: The Site is located at 29805 Pacific Highway South (State Route 99) in Federal Way, Washington (**Figure 1**), at the intersection of South Dash Point Road (State Route 509). The Property that includes the Site corresponds to King County tax parcel number 042104-9157, which covers an area of 1.71 acres. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons as gasoline (TPH-G), diesel (TPG-D), and oil (TPH-O), arsenic, cadmium, total chromium, lead, dieldrin, and 1,1,2,2-tetrachloroethane into Soil.
- Acrolein, 1,3-butadiene, benzene, chloroform, ethylene dibromide (EDB), naphthalene, tetrachloroethylene (PCE), and trichloroethylene (TCE) into Soil Vapor and Air.

Area and Property Description: The following land uses bound the Property:

- South Dash Point Road and a gasoline station on the north;
- Pacific Highway South and apartment buildings on the east;
- A hotel on the south; and
- 16th Avenue South and a park with athletic fields on the west.

The Property is located in the City of Federal Way BC commercial zone (Community Business).

Property History and Current Use: The Property was originally developed with a restaurant and gasoline service station building in the 1920s, which operated until the late 1960s and was subsequently demolished. A building constructed along the south Property boundary housed an equipment rental business until the late 1990s (**Figure 2**). A greenhouse located on the Property in the 1990s was demolished by 2000.

Automobile sales, repair, and repossession businesses operated on the Property from 2007 through 2019. Property redevelopment commenced in 2020, during which all structures were removed. The MultiCare clinic currently occupying the Property was completed in 2020 and opened in 2021.

Sources of Contamination: Site investigations conducted from 1992 through 2021 identified the following contamination sources at the Site:

- Five USTs formerly used to store gasoline, diesel, and heating oil;
    - One 5,000-gallon gasoline UST
    - One 500-gallon diesel UST
    - Three 750-gallon UST with unknown fuel contents
- One 500-gallon septic tank;
- Contaminated soil fill of unknown origin;
- Auto repair and equipment rental activities; and
- The former greenhouse.

Locations of these former Site features are shown on **Figures 2, 3, and 4**.

Physiographic Setting: The Site is located in the Puget Sound Lowland, which is characterized as a broad, low-lying region situated between the Cascade Range to the east and the Olympic Mountains and Willapa Hills to the west. The Site is situated atop the Des Moines Plain, an upland area comprised of glacial drift deposits, bounded on the east and west by the Green River Valley and Puget Sound, respectively. The Site is relatively flat at an elevation of 425 feet above mean sea level.

Surface/Storm Water System: The nearest surface water body is Redondo Creek at a distance of approximately 500 feet north of the Site. The Property is currently covered by the clinic building and a paved parking lot, bounded by plating strips on the north and east. Stormwater runoff is routed to catch basins on the Property that discharge to clay-lined detention pond located adjacent to the south Property parcel boundary. The detention pond discharges to the City of Federal Way stormwater drainage system.

Ecological Setting: The Site is bounded on the north, east, and south by buildings and paved areas. An 18-acre City of Federal Way park is located directly east of the Site, across 16th Ave S. The park includes open areas and athletic fields that provide potential wildlife habitat.

Geology: Borings completed at the Site encountered fill material (silty sand with gravel, brick and asphalt fragments, and natural organic matter) at thicknesses of 5 to 12 feet (**Figures 5 and 6**). Dense to very dense silty to clayey sand with gravel (glacial till) was present below the fill to a depth of 80 feet below ground surface (bgs). Well-sorted fine sand with gravel (glacial advance outwash) was encountered to a depth of 110 feet bgs, the maximum depth explored at the Site.

Groundwater: Discontinuous perched groundwater was encountered between 14 and 16 feet bgs during UST removal at the Site in 2000. During drilling of 84 Site borings completed from 2017-2020, indications of seasonally perched groundwater were observed in three borings. A deep boring was drilled at the site in 2017 to a depth of 110 feet bgs, completed as a temporary

monitoring well, and did not encounter groundwater that could be measured or sampled. This observation is consistent with groundwater resource reports covering southwestern King County, which indicate local depths to groundwater in the regional water supply aquifer on the order of 100 feet bgs.

Based on this Site-specific information, the soil-to-groundwater pathway is not present at the Site.

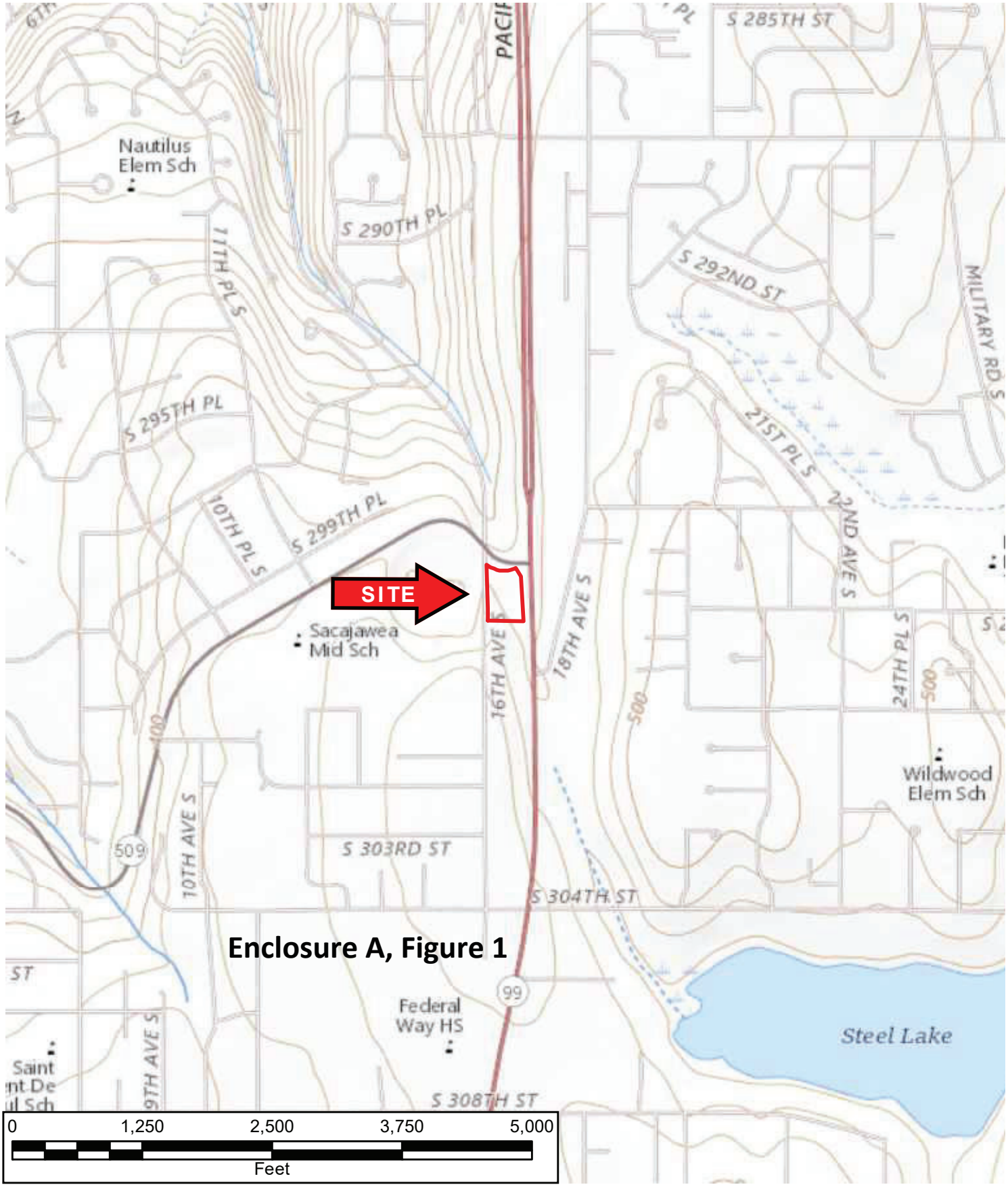
Water Supply: Potable water is supplied to the Property by the Lakehaven Water and Sewer District. The District's primary water supplies come from deep supply wells located throughout southwestern King County and northeastern Pierce County. Based on data from the State Department of Health, the nearest public water supply wells are located 0.9 miles east and southwest of the Site, with well depths of 377 and 350 feet bgs, respectively.

Releases and Cleanup of Contamination: Soil contamination was originally discovered at the Site in 1992 and 1993, when two USTs (5,000-gallon gasoline UST and 500-gallon diesel UST) were removed from the Site. Approximately 80 cubic yards of petroleum-contaminated soil were also excavated and disposed off-Site. Subsequent Site characterization and remediation activities are summarized as follows:

- Discovery and removal of three 750-gallon fuel USTs in 2000, including excavation and off-Site disposal of approximately 190 cubic yards of petroleum-contaminated soil;
- Characterization of remaining areas of soil contamination from historical activities involving hazardous materials and waste (**Figure 7**);
- Removal of contaminated soil during Property redevelopment, including a 500-gallon septic tank and approximately 1,660 cubic yards of contaminated soil for off-Site disposal;
- Collection of confirmation soil samples to document compliance with soil cleanup standards (see **Figure 7**); and
- Evaluation of soil gas potentially associated with former petroleum releases on the Site, with respect to vapor intrusion (VI) screening levels.
- Pre-remediation soil vapor samples were collected from subsurface probes in August 2017 through August 2018, with results as follows:
    - PCE, **Figure 8**: All results were below the Method B VI cancer deep soil gas screening level of 960 micrograms per cubic meter ($\mu g/m^3$) in effect at that time.
    - TCE, **Figure 9**: All results were below the Method B cancer deep soil gas screening level of 33 $\mu g/m^3$ in effect at that time.

- Benzene, **Figure 10**: Concentrations in soil gas probes B-10V, B-12, and B-13 were above the Method B cancer deep soil gas screening level of 32 µg/m^3 in effect at that time, with concentrations ranging from 130 to 180 µg/m^3. Those locations were beyond the horizontal separation distance of 30 feet from the footprint of the proposed building to be constructed on the Property. Benzene concentrations in soil vapor were below the VI screening level beneath the proposed building footprint.

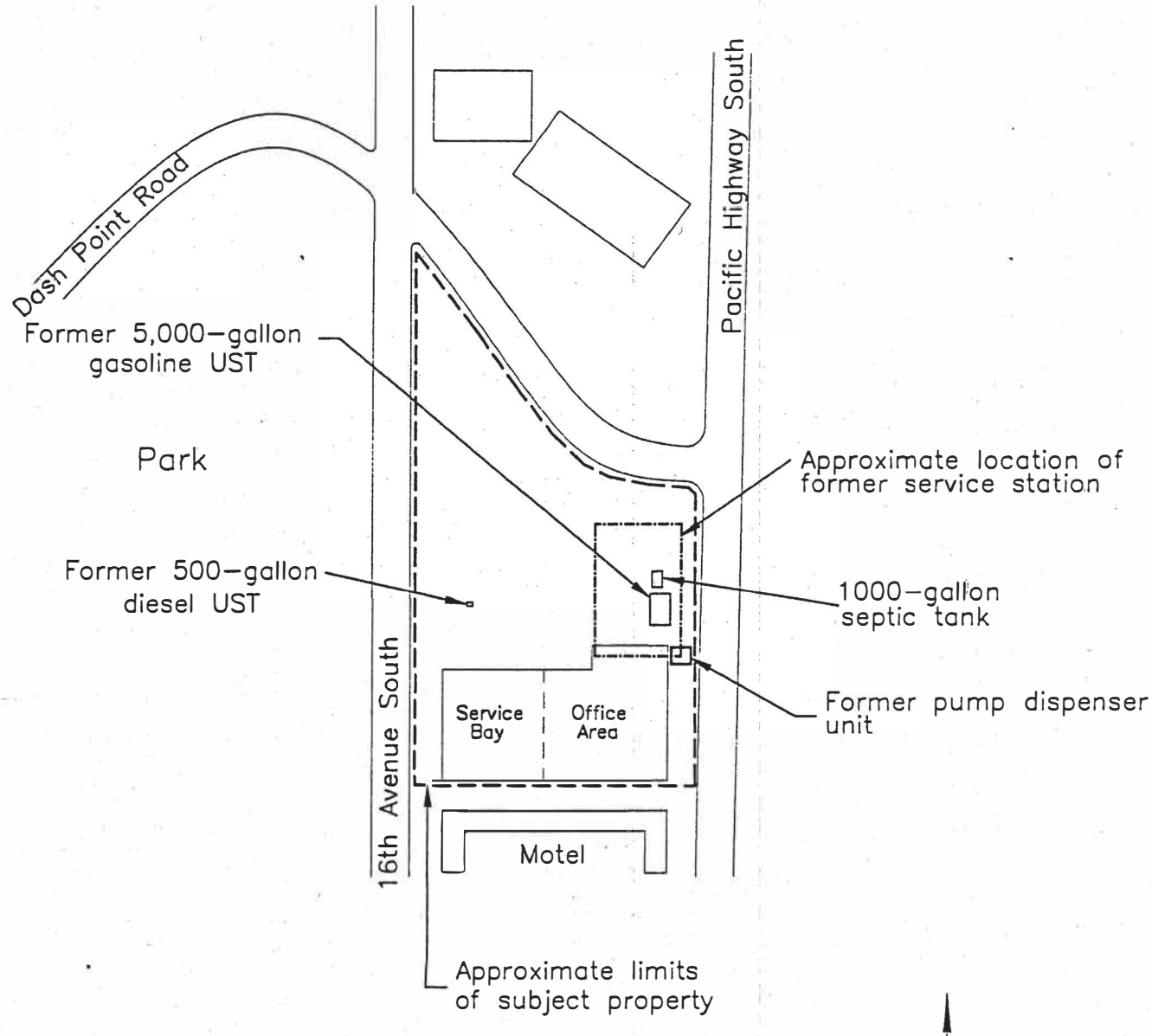
- Post-Remediation soil vapor samples were collected from sub-slab vapor pins on November 16, 2021, with results as follows:
  - PCE, **Figure 11**: All results were below the Method B VI cancer sub-slab soil gas screening level of 320 µg/m^3.
  - TCE, **Figure 12**: All results were below the Method B cancer sub-slab soil gas screening level of 11 µg/m^3.
  - Benzene, **Figure 13**: Concentrations at eight of the 10 sub-slab vapor pins were above the Method B cancer deep soil gas screening level of 11 µg/m^3, ranging from 11.1 to 49.2 µg/m^3. All of those locations were beyond the horizontal separation distance of 30 feet from the completed clinic building that was constructed on the Property in 2020. The observed sub-slab concentrations show a reduction by factors of 5 to 16.5 times compared to the pre-construction deep soil gas sample results, confirming that contaminated soil removal substantially reduced benzene concentrations in soil vapor.
- The soil vapor sampling evaluation completed by TGE Resources also correctly documented the following:
  - Acrolein and 1,3-butadiene are commonly detected in soil gas samples, are considered by researchers to be false positives with respect to vapor intrusion, and are associated with sampling methods and sampling vessels.
  - Chloroform is ubiquitous in soil vapor and indoor air, is commonly associated with disinfection byproducts in chlorinated drinking water, and is also considered by researchers as a false positive with respect to vapor intrusion.
- The developer of the Property (MultiCare) routinely incorporates Vapor Intrusion Mitigation Systems (VIMS) into their clinic designs as a precautionary measure. The clinic building constructed on the Property in 2020 has a VIMS in place. The pre-and post-remediation soil gas data confirmed the absence of a VI exposure route to the new building; therefore, the VIMS installed beneath the building is not necessary to maintain the protectiveness of the cleanup action, and an environmental covenant incorporating the VIMS as an engineered control is not required as a component of this Site No Further Remedial Action opinion.



Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, WA
TGE Project No.: R13411.07

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 1
Site Location Map
USGS 7.5 Minute Series Topographic Map
Poverty Bay, Washington Quadrangle
2014

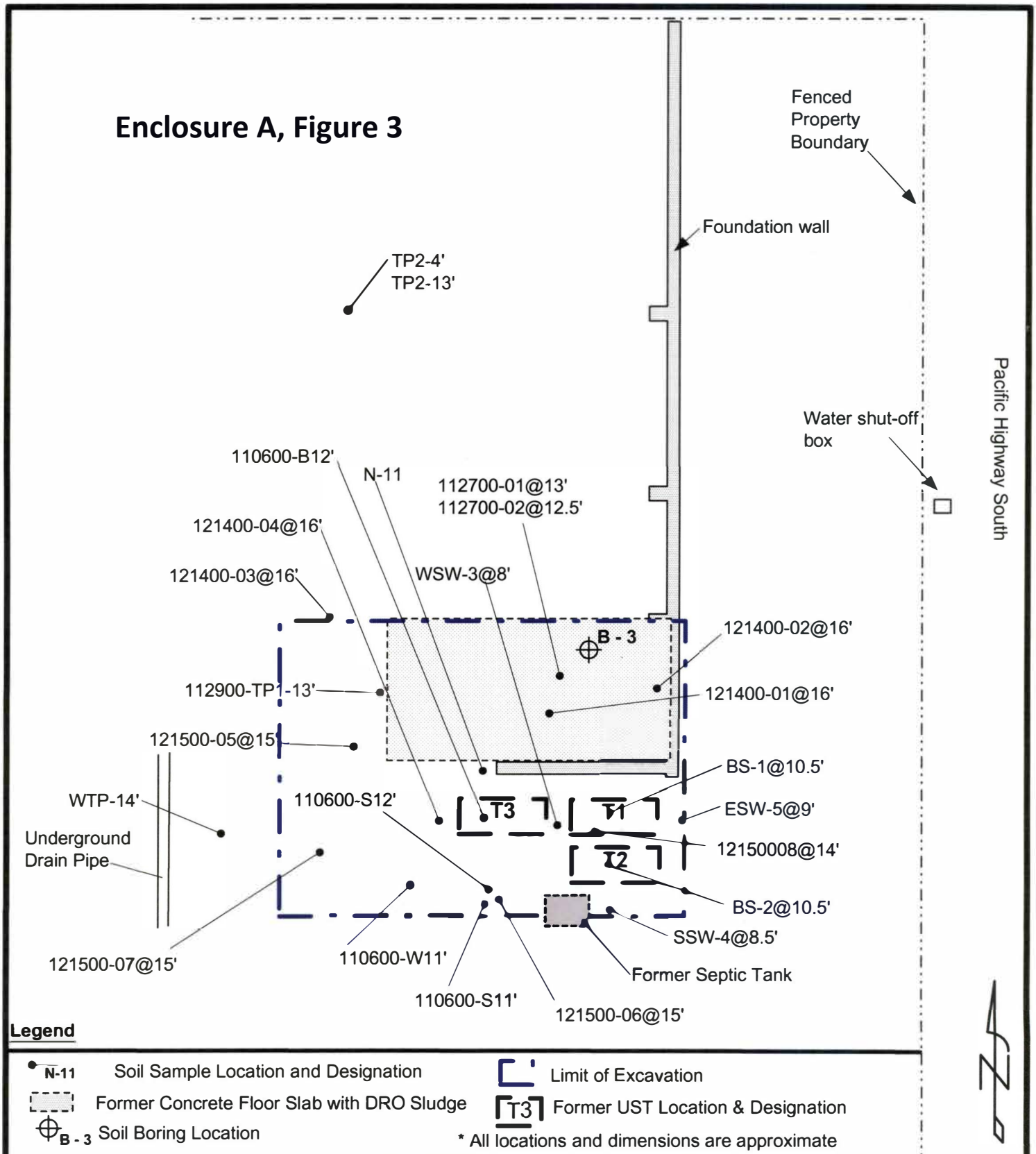


Enclosure A, Figure 2

Not to Scale

KLEINFELDER	Past Site Plan 29805 Pacific Highway South Federal Way, WA 98003	FIGURE 3
Project: 60-2081-01 May 2000		

Enclosure A, Figure 3



Legend

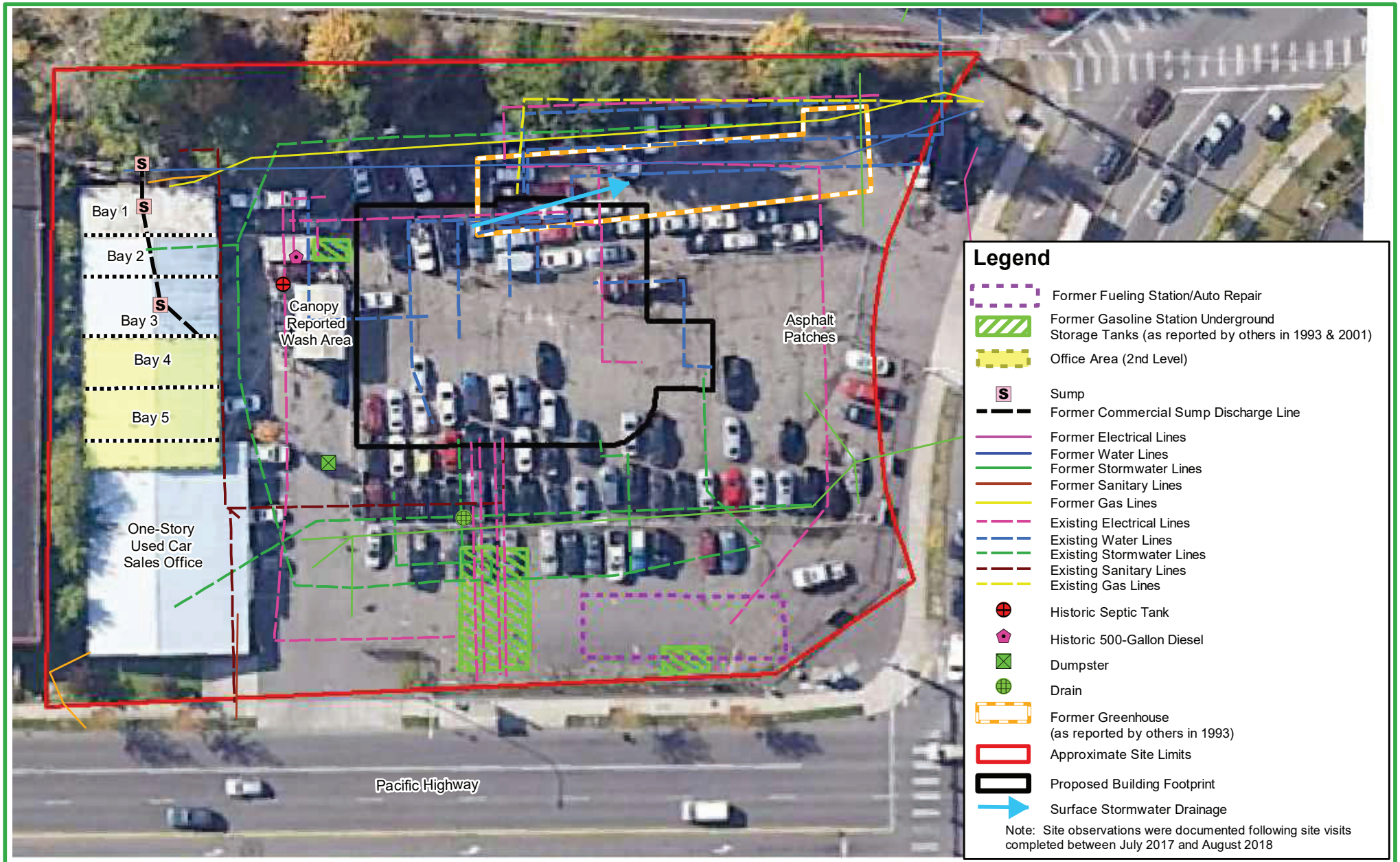
- N-11 Soil Sample Location and Designation
- Former Concrete Floor Slab with DRO Sludge
- B - 3 Soil Boring Location
- Limit of Excavation
- T3 Former UST Location & Designation
- * All locations and dimensions are approximate

VATC ASSOCIATES INC.
Solutions For Environmental Concerns

PROJECT NO.: 76.17883.0902		
DESIGNED BY: MW	SCALE: 1"=10'	TYPE:
DRAWN BY: DFK	DATE : 1/2/01	FILE: Fig2.vsd

SOIL SAMPLE LOCATIONS

SUBSURFACE INVESTIGATION
RUTH EVANS TRUST
29805 PACIFIC HIGHWAY SOUTH
FEDERAL WAY, WASHINGTON

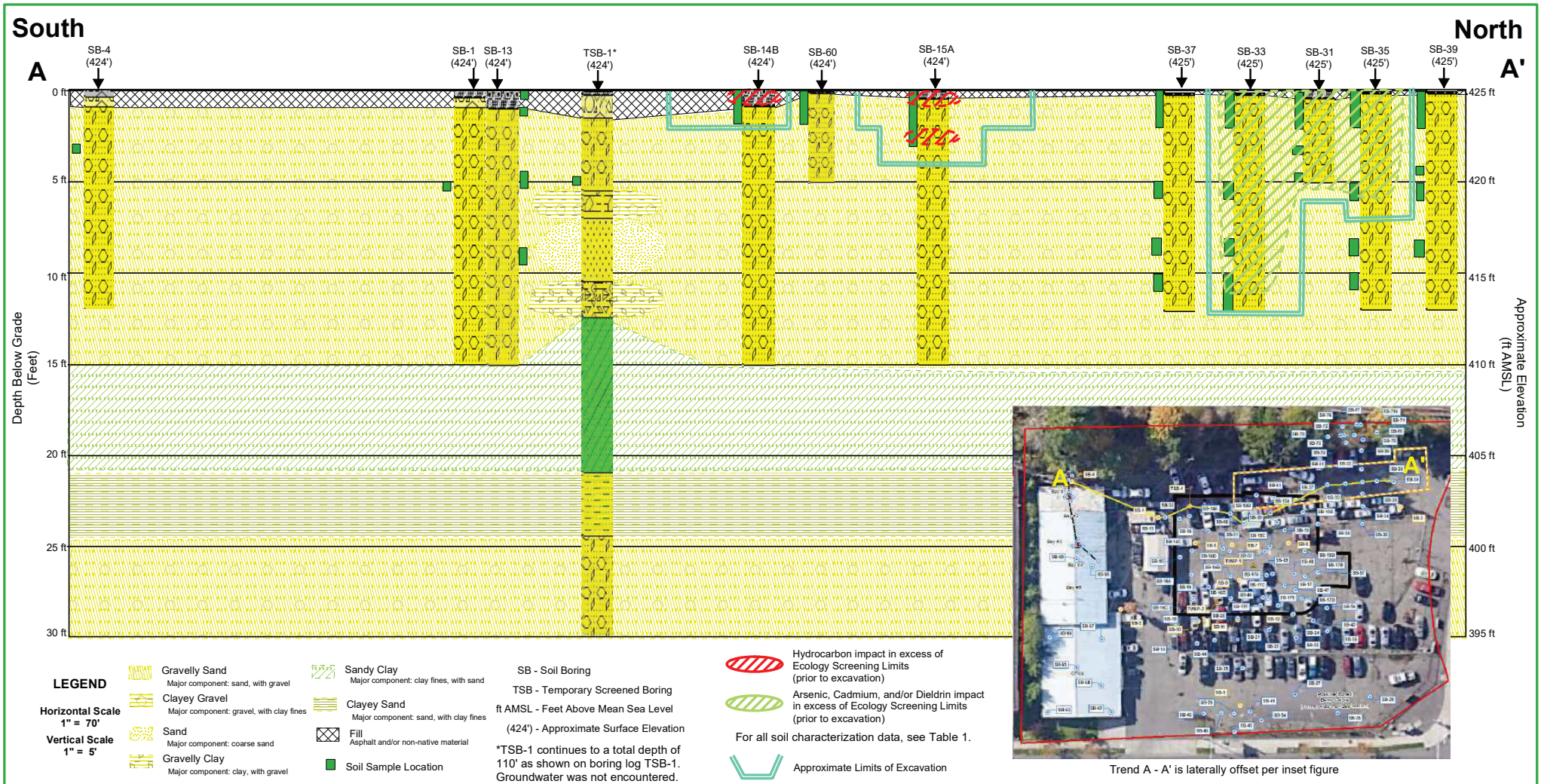


Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.07

TGERESOURCES,INC.
8048 Northcourt Road
Houston, Texas 77040

Enclosure A, Figure 4

Figure 4
Site Details Map



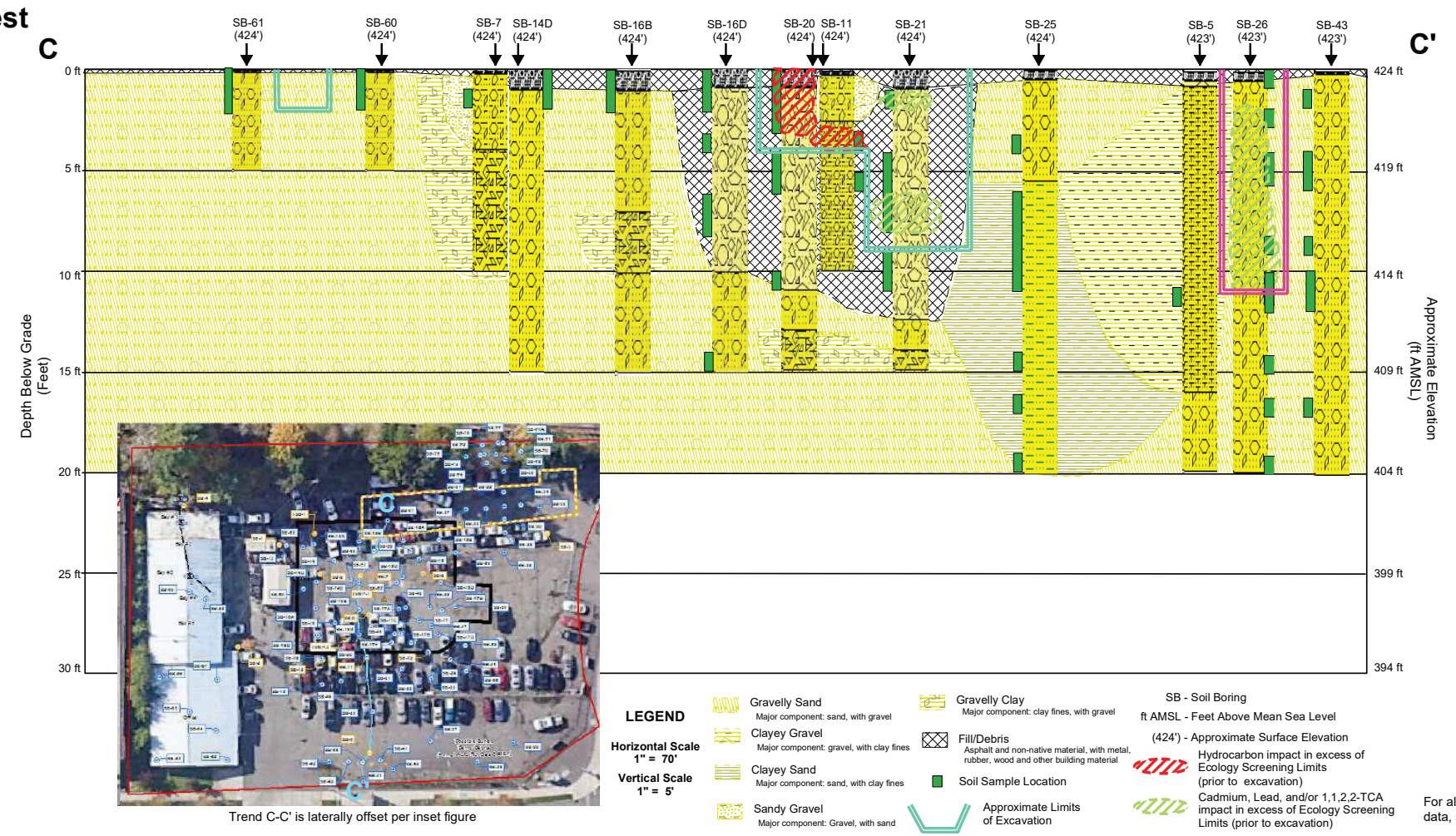
Trend A - A' is laterally offset per inset figure

Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No. R13411.07

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 18
Stratigraphic Cross Section
A (SB-4) to A' (SB-39)

Enclosure A, Figure 5



Trend C-C' is laterally offset per inset figure

Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No. R13411.07

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 20
Stratigraphic Cross Section
C (SB-61) to C' (SB-43)

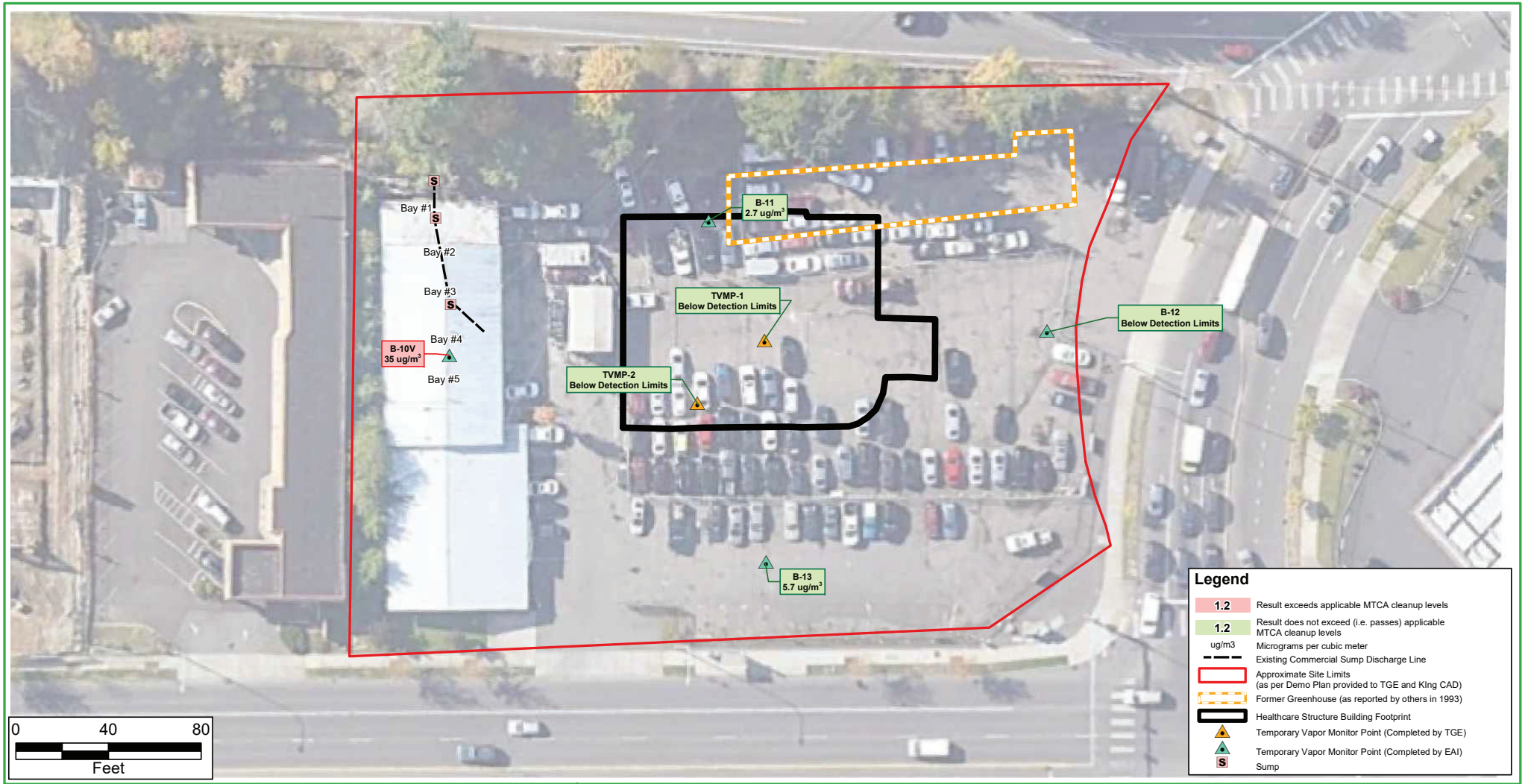
Enclosure A, Figure 6

Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.07

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 16
Approximate Excavation Zone Limits & Confirmation Soil Sample Map

Enclosure A, Figure 7

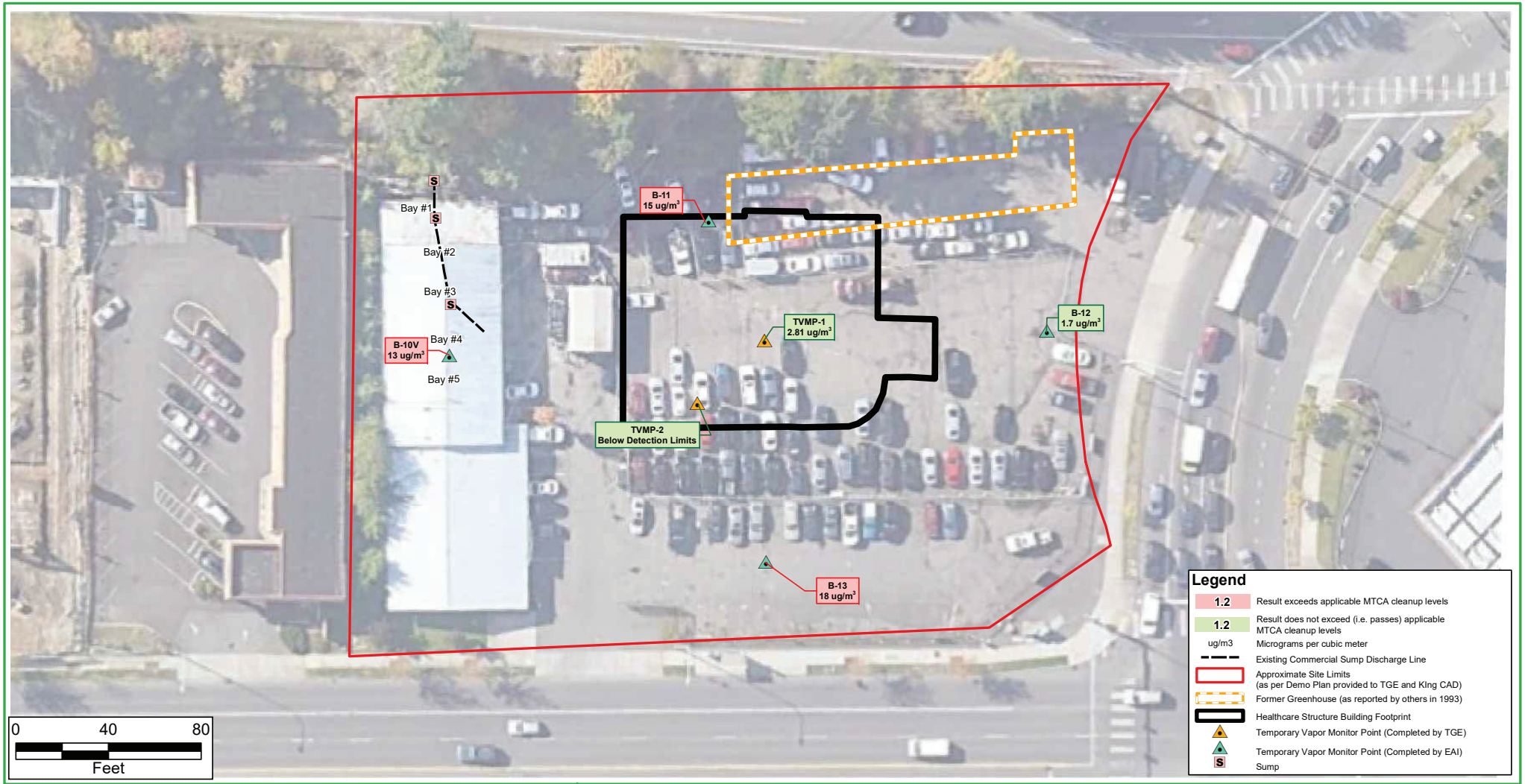


Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.13

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 5A
Soil Vapor Concentration Map
Tetrachloroethylene
(August 2017 - August 2018)

Enclosure A, Figure 8

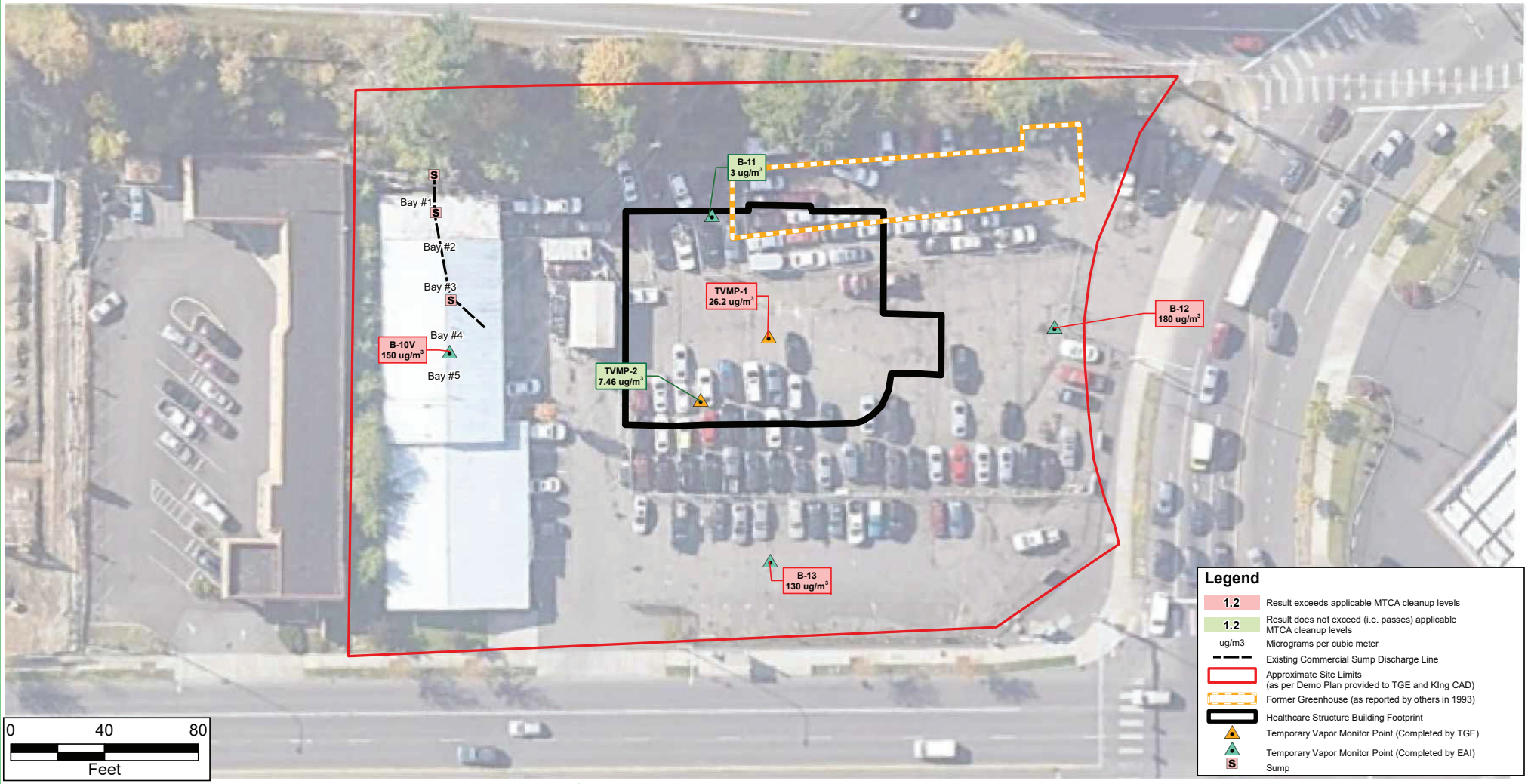


Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.13

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 4A
Soil Vapor Concentration Map
Trichloroethylene
(August 2017 - August 2018)

Enclosure A, Figure 9

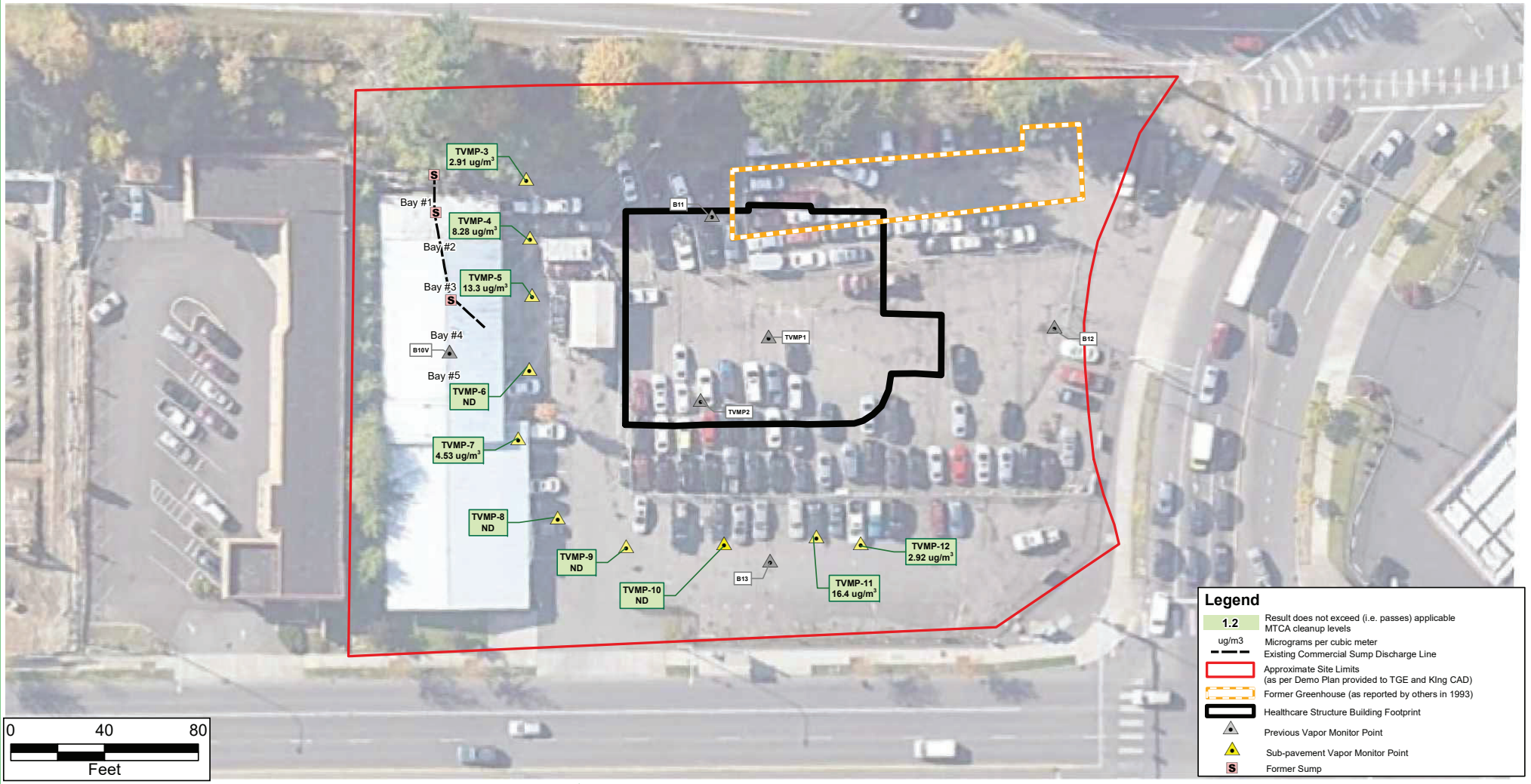


Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.13

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 3A
Soil Vapor Concentration Map
Benzene
(August 2017 - August 2018)

Enclosure A, Figure 10

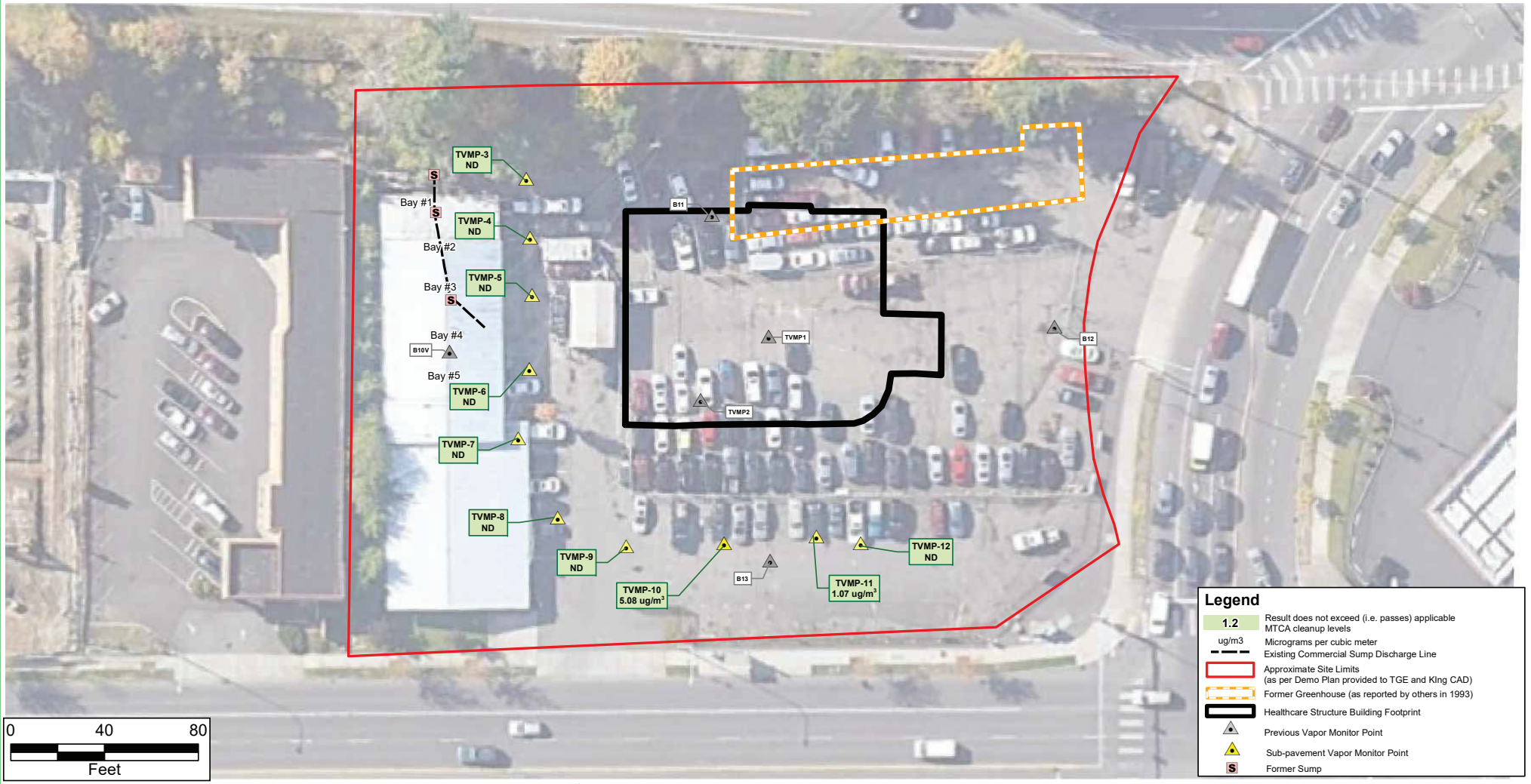


Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.13

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 5B
Soil Vapor Concentration Map
Tetrachloroethylene
(November 21, 2021)

Enclosure A, Figure 11

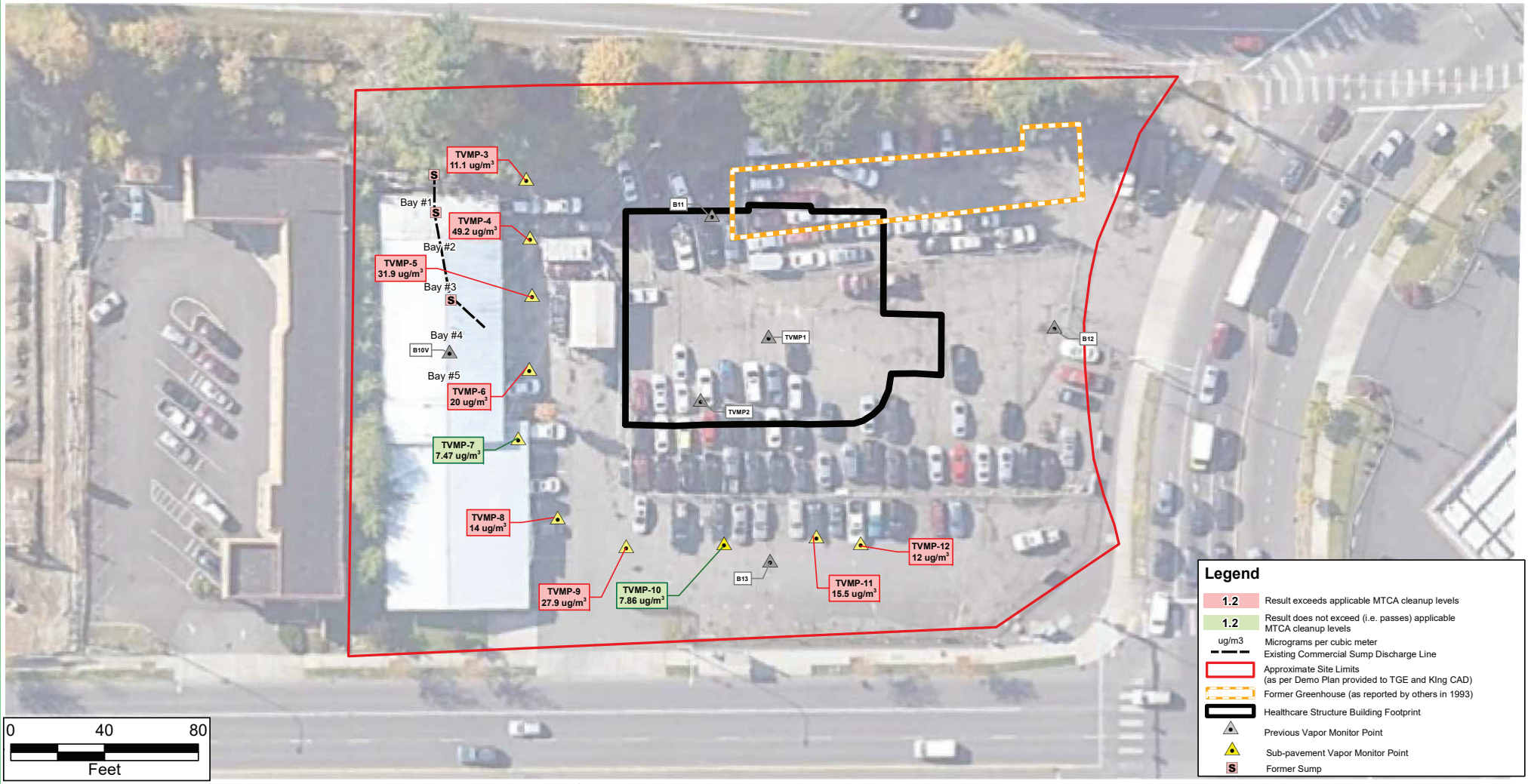


Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.13

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 4B
Soil Vapor Concentration Map
Trichloroethylene
(November 16, 2021)

Enclosure A, Figure 12



Former Payless Auto Mart
29805 Pacific Highway South
Federal Way, King County, Washington
TGE Project No.: R13411.13

TGE RESOURCES, INC.
8048 Northcourt Road
Houston, Texas 77040

Figure 3B
Soil Vapor Concentration Map
Benzene
(November 16, 2021)

Enclosure A, Figure 13

Enclosure B

Basis for the Opinion: List of Documents

1. TGE Resources, Inc. (TGE). 2022. Terrestrial Ecological Evaluation, Remedial Investigation Addendum, Former Payless Auto Mart, *29805 Pacific Highway South, Federal Way, King County, Washington*. October 31, 2022.
2. TGE. 2022. *Supplemental Confirmation Testing, Former Payless Auto Mart, 29805 Pacific Highway South, Federal Way, King County, Washington*. October 10, 2022.
3. TGE. 2022. *Vapor Intrusion Mitigation System, Site Closure Request Memorandum, Former Payless Auto Mart, 29805 Pacific Highway South, Federal Way, King County, Washington*. June 30, 2022.
4. TGE. 2022. *Vapor Intrusion Mitigation System, Supplemental Performance Testing, Former Payless Auto Mart, 29805 Pacific Highway South, Federal Way, King County, Washington*. March 14, 2022.
5. TGE. 2021. *Remedial Investigation and Independent Remedial Action Report, Former Payless Auto Mart, 29805 Pacific Highway South, Federal Way, King County, Washington*. April 19, 2021.
6. Washington State Department of Ecology. *Rescission of May 17, 2001, No Further Action Determination, Payless Auto Mart, 29805 Pacific Highway South, Federal Way, Washington*. May 14, 2020.
7. TGE. 2020. *Release Notification, 29805 Pacific Highway South, Federal Way, King County, Washington*. March 3, 2020.
8. TGE. 2020. *Soil Management Plan, Future Federal Way Hospital, 29805 Pacific Highway South, Federal Way, King County, Washington*. February 17, 2020.
9. TGE. 2018. *Limited Phase II ESA Oversight & Split Sampling Event, Proposed Federal Way Hospital, 29805 Pacific Highway South, Federal Way, King County, Washington*. September 21, 2018.
10. Environmental Associates, Inc. 2018. *Phase II Limited Subsurface Sampling and Testing, Commercial Property, 29805 Pacific Highway South, Federal Way, Washington*. August 31, 2018.
11. TGE. 2017. *Supplemental Phase II Environmental Site Assessment, Proposed Star Lake Hospital, 29805 Pacific Highway South, Federal Way, King County, Washington*. November 8, 2017.
12. TGE. 2017. *Limited Phase II Environmental Site Assessment, Proposed Star Lake Hospital, 29805 Pacific Highway South, Federal Way, King County, Washington*. September 12, 2017.
13. TGE. 2017. *Phase I Environmental Site Assessment, Payless Auto Sales, Repossession, and Auto Repair, 29805 Pacific Highway South, Federal Way, King County, Washington*. August 17, 2017.

14. ATC Associates (ATC). 2001. *Underground Storage Tank Site Assessment at the Ruth Evans Trust Site, 29805 Pacific Highway South, Federal Way, Washington 98003*. February 16, 2001.

15. ATC. 2001. *Report of Subsurface Investigation at 29805 Pacific Highway South in Federal Way, Washington*. February 2, 2001.

16. Kleinfelder, Inc. 2000. *Phase I Environmental Site Assessment, Vacant Commercial Property, 29805 Pacific Highway South in Federal Way, Washington 98003*. June 13, 2000.

17. Nowicki & Associates, Inc. 1993. *Site Assessment/Site Characterization, Gasoline Tank and Dispenser, DOE ID #006523, Federal Way Rental Mart, 29805 Pacific Hwy S, Federal Way, WA 98003*. February 9, 1993.

18. Hazcon, Inc. 1993. *Rental Marts UST Removal Project, Federal Way, Washington, UST Site Assessment*. July 26, 1993.