



INITIAL INVESTIGATION FIELD REPORT

☐ Check this box if you have attached any documents to this form (using the paperclip icon on the left).

ERTS #(s):
Parcel #(s):
County:
FSID #:
CSID #:
UST #:

718386
** see below
Snohomish
50378
16721

SITE INFORMATION

<u>Site Name (Name over door):</u> Excellent Choice Auto Sales	<u>Site Address (including City, State and Zip):</u> 9302 9310 9314 State Ave Marysville, WA 98270	<u>Phone</u> <u>Email</u>
<u>Site Contact, Title, Business:</u> Paul Riley The Riley Group	<u>Site Contact Address (including City, State and Zip):</u> 17522 Bothell Way NE Bothell, WA 98011	<u>Phone</u> (425) 415-0551 <u>Email</u> priley@riley-group.com
<u>Site Owner, Title, Business:</u> Shawn Rahimzadeh, Excellent Choice Auto Sales	<u>Site Owner Address (including City, State and Zip):</u> P.O Box 13440 Mill Creek, Washington 98082	<u>Phone</u> (360) 938-7077 <u>Email</u> shawn@excellentchoiceauto.com
<u>Site Owner Contact, Title, Business:</u>	<u>Site Owner Contact Address (including City, State and Zip):</u>	<u>Phone</u> <u>Email</u>
<u>Previous Site Owner(s):</u>	<u>Additional Info (for any Site Information Item):</u> ** Parcels 30051600303000, 30051600303200, 30051600303100	
<u>Alternate Site Name(s):</u> Marysville Excellent Choice Auto ECA	FSID 50378 has a WQ UIC interaction starting 5/2/21	

Latitude (Decimal Degrees): 48.080324

Longitude (Decimal Degrees): -122.175107

INSPECTION INFORMATION

Please check this box if there is relevant inspection information, such as data or photos, in an existing site report for this site.

Inspection Conducted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date/Time:	Entry Notice: Announced <input type="checkbox"/> Unannounced <input type="checkbox"/>
Photographs taken? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Note: Attach photographs or upload to PIMS	
Samples collected? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Note: Attach record with media, location, depth, etc.	

RECOMMENDATION

No Further Action (Check appropriate box below):	LIST on Confirmed and Suspected Contaminated Sites List: <input checked="" type="checkbox"/>
Release or threatened release does not pose a threat <input type="checkbox"/>	
No release or threatened release <input type="checkbox"/>	
Refer to program/agency (Name: _____) <input type="checkbox"/>	
Independent Cleanup Action Completed (contamination removed) <input type="checkbox"/>	

COMPLAINT (Brief Summary of ERTS Complaint):

Paul Riley from The Riley Group reached out to Ecology Toxics Cleanup Program staff to determine if a site where they have recently completed cleanup activities to address contamination from a former gas station was already known to Ecology, or if it should be evaluated through an Initial Investigation. The location is currently a car sales lot. The location is not an existing cleanup site, and should therefore receive an ERTS report and be referred to TCP for a MTCA Initial Investigation. Reports related to site investigation and cleanup were sent to Kim Wooten in TCP.

CURRENT SITE STATUS (Brief Summary of why Site is recommended for Listing or NFA):

Soil and groundwater contaminated with petroleum hydrocarbons above Method A cleanup levels was discovered on the property. Persulfate injections were performed to address contamination. However, post-injection confirmation soil samples were not collected and it is not clear if the extent of contamination in soil and groundwater was fully delineated. Recommendation: Add to Confirmed and Suspected Contaminated Sites List.

Investigator: David Butler

Date Submitted: 12/5/2022

OBSERVATIONS**Please check this box if you included information on the Supplemental Page at end of report.**

Description (If site visit made, please be sure to include the following: site observations, site features and cover, chronology of events, sources/past practices likely responsible for contamination, presence of water supply wells and other potential exposure pathways, etc.):

A Phase I Environmental Site Assessment (ESA) was completed for the property on December 12, 2018. The Phase I ESA found evidence that a gas station and oil burner historically existed on the site. The Phase I ESA recommended conducting a geophysical survey to attempt to locate any abandoned, decommissioned, or former UST locations at the Site. It also recommended performing limited sampling to evaluate soil and shallow groundwater quality in the vicinity of the reported USTs.

A Preliminary Phase II ESA was completed for the property on March 21, 2019. The Phase II ESA found evidence of petroleum contamination in groundwater, but did not confirm impacts to soil. The Phase II ESA did not locate any USTs. The report recommended additional sampling to investigate the extent of contamination and reporting the discovered contamination to Ecology.

A Supplemental Phase II Subsurface Investigation was completed on September 19, 2019. This supplemental investigation confirmed petroleum impacts to soil and further investigated the extent of petroleum contamination in groundwater. Additionally, ground penetrating radar was utilized to search for evidence of existing or former USTs associated with the former gas station. No evidence of existing or former USTs was discovered. The report recommended preparation of a Remedial Investigation and Feasibility Study for the site and enrolling the site in Ecology's Voluntary Cleanup Program.

A Groundwater Monitoring Well Installation was completed on January 18, 2021. Three monitoring wells were installed during this effort. Soil and groundwater contamination was not found above cleanup levels in the three monitoring wells installed during this effort.

An Additional Groundwater Investigation was completed on March 24, 2021. Additional soil and groundwater samples were collected from soil borings and temporary wells to further refine the nature and extent of contamination.

A PersulfOx Chemical Injection Event was completed on December 30, 2021. Two rounds of PersulfOx injection (a sodium persulfate based technology) were completed in June and July 2021 to address soil and groundwater contamination on the property. The report recommended follow-up quarterly groundwater monitoring to evaluate the success of the injections.

The 2022 Third Quarter Groundwater Monitoring Report, completed on October 14, 2022, summarizes the results of five quarterly post-injection groundwater monitoring events. The data show that petroleum contamination in groundwater is below MTCA Method A Groundwater Cleanup Levels at the five on-site wells. The report recommended submitting the various reports to Ecology with the goal of receiving a No Further Action determination as part of the Initial Investigation process.

Continued on Page 6

Documents reviewed:

The Riley Group. Phase I Environmental Site Assessment, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. December 12, 2018.
The Riley Group. Preliminary Phase II Subsurface Investigation, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. March 21, 2019.
The Riley Group. Revised Supplemental Phase II Subsurface Investigation, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. January 25, 2021.
The Riley Group. Revised Groundwater Monitoring Well Installation, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. January 25, 2021.
The Riley Group. Additional Groundwater Investigation, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. March 24, 2021.
The Riley Group. 2021 PersulfOx Chemical Injection Event Report, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. December 30, 2021.
The Riley Group. 2022 Third Quarter Groundwater Monitoring Report, Marysville Excellent Choice Auto Sales, 9302, 9310, and 9314 State Avenue, Marysville, Washington. October 14, 2022.

CONTAMINANT GROUP	CONTAMINANT	SOIL	GROUNDWATER	SURFACE WATER	AIR	SEDIMENT	DESCRIPTION
Non-Halogenated Organics	Phenolic Compounds						Compounds containing phenols (Examples: phenol; 4-methylphenol; 2-methylphenol)
	Non-Halogenated Solvents						Organic solvents, typically volatile or semi-volatile, not containing any halogens. To determine if a product has halogens, search HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB) and look at the Chemical/Physical Properties, and Molecular Formula. If there is not a Cl, I, Br, F in the formula, it's not halogenated. (Examples: acetone, benzene, toluene, xylenes, methyl ethyl ketone, ethyl acetate, methanol, ethanol, isopropanol, formic acid, acetic acid, stoddard solvent, Naptha). <i>Use this when TEX contaminants are present independently of gasoline.</i>
	Polynuclear Aromatic Hydrocarbons (PAH)	C	S				Hydrocarbons composed of two or more benzene rings.
	Tributyltin						The main active ingredients in biocides used to control a broad spectrum of organisms. Found in antifouling marine paint, antifungal action in textiles and industrial water systems. (Examples: Tributyltin; monobutyltin; dibutyltin)
	Methyl tertiary-butyl ether	S	S				MTBE is a volatile oxygen-containing organic compound that was formerly used as a gasoline additive to promote complete combustion and help reduce air pollution.
	Benzene	B	B				Benzene
	Other Non-Halogenated Organics	C	B				TEX
	Petroleum Diesel	B	C				Petroleum Diesel
	Petroleum Gasoline	C	C				Petroleum Gasoline
	Petroleum Other	B	B				Oil-range organics
Halogenated Organics (see notes at bottom)	PBDE						Polybrominated di-phenyl ether
	Other Halogenated Organics						Other organic compounds with halogens (chlorine, fluorine, bromine, iodine). search HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB) and look at the Chemical/Physical Properties, and Molecular Formula. If there is a Cl, I, Br, F in the formula, it is halogenated. (Examples: Hexachlorobutadiene; hexachlorobenzene; pentachlorophenol)
	Halogenated solvents						PCE, chloroform, EDB, EDC, MTBE
	Polychlorinated Biphenyls (PCB)						Any of a family of industrial compounds produced by chlorination of biphenyl, noted primarily as an environmental pollutant that accumulates in animal tissue with resultant pathogenic and teratogenic effects
	Dioxin/dibenzofuran compounds (see notes at bottom)						A family of more than 70 compounds of chlorinated dioxins or furans. (Examples: Dioxin; Furan; Dioxin TEQ; PCDD; PCDF; TCDD; TCDF; OCDD; OCDF). <i>Do not use for 'dibenzofuran', which is a non-chlorinated compound that is detected using the semivolatile organics analysis 8270</i>
Metals	Metals - Other						Cr, Se, Ag, Ba, Cd
	Lead	S	S				Lead
	Mercury						Mercury
	Arsenic						Arsenic
Pesticides	Non-halogenated pesticides						Pesticides without halogens (Examples: parathion, malathion, diazinon, phosmet, carbaryl (sevin), fenoxycarb, aldicarb)
	Halogenated pesticides						Pesticides with halogens (Examples: DDT; DDE; Chlordane; Heptachlor; alpha-beta and delta BHC; Aldrin; Endosulfan, dieldrin, endrin)

CONTAMINANT GROUP	CONTAMINANT	SOIL	GROUNDWATER	SURFACE WATER	AIR	SEDIMENT	DESCRIPTION
Other Contaminants	Radioactive Wastes						Wastes that emit more than background levels of radiation.
	Conventional Contaminants, Organic						Unspecified organic matter that imposes an oxygen demand during its decomposition (Example: Total Organic Carbon)
	Conventional Contaminants, Inorganic						Non-metallic inorganic substances or indicator parameters that may indicate the existence of contamination if present at unusual levels (Examples: Sulfides, ammonia)
	Asbestos						All forms of Asbestos. Asbestos fibers have been used in products such as building materials, friction products and heat-resistant materials.
	Other Deleterious Substances						Other contaminants or substances that cause subtle or unexpected harm to sediments (Examples: Wood debris; garbage (e.g., dumped in sediments))
	Benthic Failures						Failures of the benthic analysis standards from the Sediment Management Standards.
	Bioassay Failures						For sediments, a failure to meet bioassay criteria from the Sediment Management Standards. For soils, a failure to meet TEE bioassay criteria for plant, animal or soil biota toxicity.
Reactive Wastes	Unexploded Ordnance						Weapons that failed to detonate or discarded shells containing volatile material.
	Other Reactive Wastes						Other Reactive Wastes (Examples: phosphorous, lithium metal, sodium metal)
	Corrosive Wastes						Corrosive wastes are acidic or alkaline (basic) wastes that can readily corrode or dissolve materials they come into contact with. Wastes that are highly corrosive as defined by the Dangerous Waste Regulation (WAC 173-303-090(6)). (Examples: Hydrochloric acid; sulfuric acid; caustic soda)

(fill in contaminant matrix above with appropriate status choice from the key below the table)

Status choices for contaminants	
Contaminant Status	Definition
B— Below Cleanup Levels (Confirmed)	The contaminant was tested and found to be below cleanup levels. (Generally, we would not enter each and every contaminant that was tested; for example if an SVOC analysis was done we would not enter each SVOC with a status of "below". We would use this for contaminants that were believed likely to be present but were found to be below standards when tested)
S— Suspected	The contaminant is suspected to be present; based on some knowledge about the history of the site, knowledge of regional contaminants, or based on other contaminants known to be present
C— Confirmed Above Cleanup Levels	The contaminant is confirmed to be present above any cleanup level. For example—above MTCA method A, B, or C; above Sediment Quality Standards; or above a presumed site-specific cleanup level (such as human health criteria for a sediment contaminant).
RA— Remediated - Above	The contaminant was remediated, but remains on site above the cleanup standards (for example—capped area).
RB— Remediated - Below	The contaminant was remediated, and no area of the site contains this contaminant above cleanup standards (for example— complete removal of contaminated soils).

Halogenated chemicals and solvents: Any chemical compound with chloro, bromo, iodo or fluoro is halogenated; those with eight or fewer carbons are generally solvents (e.g. halogenated methane, ethane, propane, butane, pentane, hexane, heptane or octane) and may also be used for or registered as pesticides or fumigants. Most are dangerous wastes, either listed or categorical. Organic compounds with more carbons are almost always halogenated pesticides or a contaminant or derivative. Referral to the HSDB is recommended if you are unfamiliar with a chemical name or compound, as it contains useful information about synonyms, uses, trade names, waste codes, and other regulatory information about most toxic or potentially toxic chemicals.

Dibenzodioxins and dibenzofurans are normalized to a combined equivalent toxicity based on 2,3,7,8-tetrachloro-p-dibenzodioxin as set out in WAC 173-340-708(8)(d) and in the Evaluating the Toxicity and Assessing the Carcinogenic Risk of Environmental Mixtures using Toxicity Equivalency Factors Focus Sheet (<https://fortress.wa.gov/ecy/clarc/FocusSheets/tef.pdf>). Results may be reported as individual compounds and isomers (usually lab results), or as a toxic equivalency value (reports).

FOR ECOLOGY II REVIEWER USE ONLY (For Listing Sites):

How did the Site come to be known: ☒ Site Discovery (received a report): 10/20/2022 (Date Report Received)
☐ ERTS Complaint
☐ Other (please explain): _____

Does an Early Notice Letter need to be sent: ☒ Yes ☐ No
If No, please explain why: _____

NAICS Code (if known): 457,110

Otherwise, briefly explain how property is/was used (i.e., gas station, dry cleaner, paint shop, vacant land, etc.):

Former gas station

Site Unit(s) to be created (Unit Type): ☒ Upland (includes VCP & LUST) ☐ Sediment
If multiple Units needed, please explain why: _____

Cleanup Process Type (for the Unit): ☐ No Process ☒ Independent Action
☐ Voluntary Cleanup Program ☐ Ecology-supervised or conducted
☐ Federal-supervised or conducted

Site Status: ☐ Awaiting Cleanup ☐ Construction Complete – Performance Monitoring **Model Remedy Used?** ☐
☒ Cleanup Started ☐ Cleanup Complete – Active O&M/Monitoring **If yes, was this a** ☐
☐ No Further Action Required **transformer spill?**

Site Manager (Default: _____): _____

Specific confirmed contaminants include:

TPH in Soil

TPH in Groundwater

 in Other (specify matrix:)

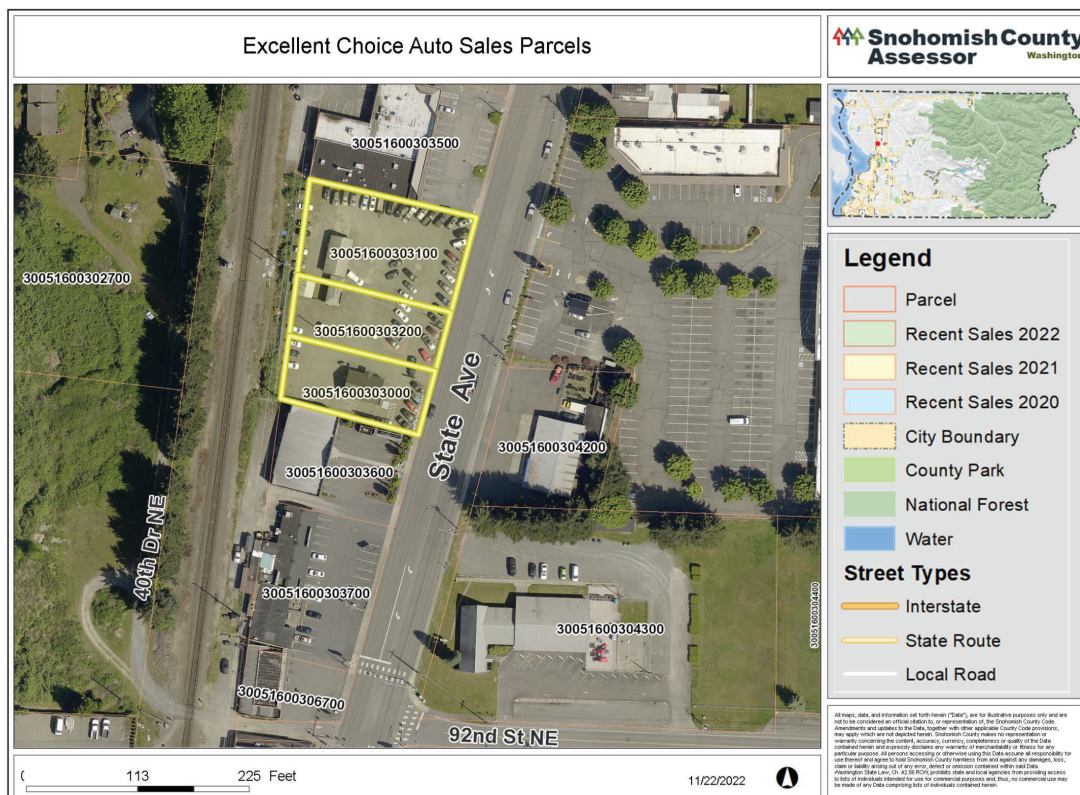
Facility/Site ID No. (if known):

50378

Cleanup Site ID No. (if known):

16721

COUNTY ASSESSOR INFO: Please attach to this report a copy of the tax parcel/ownership information for each parcel associated with the site, as well as a parcel map illustrating the parcel boundary and location.



Additional or Supplemental Information from Observations Page

Please use this box for any text that requires special formatting

Data gaps:

The reports do not provide sufficient evidence that contamination in soil and groundwater has been fully delineated.

Arsenic need to be sampled for in groundwater to confirm it has not been mobilized by the high pH injectate.

A major data gap the reports do not address is if the injections remediated contamination in soil. No post-injection soil samples were collected, so soil contamination cannot be said to be remediated.

Contaminants associated with fuels (in this case lead, MTBE, and PAHs) need to be fully investigated at the site. Only one sample in soil and one sample in groundwater was analyzed for lead, MTBE, and PAHs, which is not sufficient to determine presence or absence at the site.

Suggestions:

The "2022 Third Quarter Groundwater Monitoring Report" presents groundwater data for the sampling events, but time-series plots of the data should be provided to allow for easy visualization of data trends. This will also help reviewers assess the potential for contaminant rebound.


MW5											
Date	Gas	B	T	E	X	DSL	Oil	VOCs	Naph.	Total Pb	Dissolved Pb
09/26/22	140	ND	ND	ND	ND	79x	ND	---	---	---	---
06/21/22	520	ND	ND	ND	ND	280x	ND	---	---	---	---
03/21/22	230	ND	ND	ND	ND	100x	ND	---	---	---	---
12/22/21	990	ND	3.7	ND	ND	340x	ND	---	---	---	---
09/24/21	680	ND	ND	ND	ND	200x	ND	ND	ND	6.70	ND








MW4					
Date	Gas	BTEX	DSL	Oil	Sulfate
09/26/22	ND	ND	96x	ND	---
06/21/22	120	ND	64x	ND	---
03/21/22	ND	ND	67x	ND	---
12/22/21	180	ND	130x	ND	14,200
09/24/21	200	ND	ND	ND	---

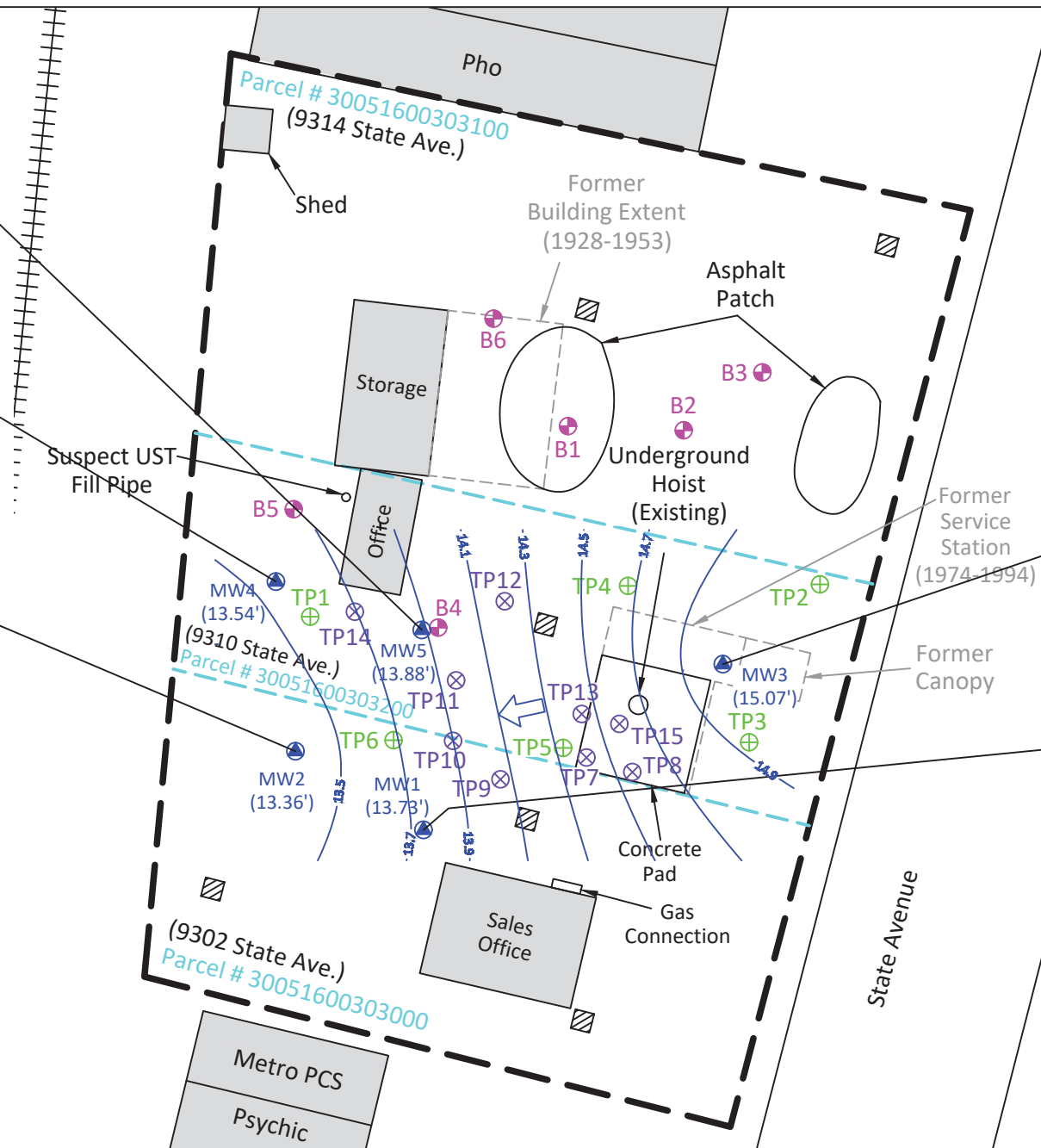
MW2					
Date	Gas	BTEX	DSL	Oil	Sulfate
09/26/22	ND	ND	ND	ND	---
06/21/22	ND	ND	ND	ND	---
03/21/22	ND	ND	ND	ND	---
12/22/21	ND	ND	ND	ND	5,650
09/24/21	ND	ND	ND	ND	---
12/23/20	ND	ND	ND	ND	---

MW3				
Date	Gas	BTEX	DSL	Oil
09/26/22	ND	ND	ND	ND
06/21/22	ND	ND	ND	ND
03/21/22	ND	ND	ND	ND
12/22/21	ND	ND	ND	ND
09/24/21	ND	ND	ND	ND
12/23/20	ND	ND	ND	ND


MW1				
Date	Gas	BTEX	DSL	Oil
09/26/22	ND	ND	ND	ND
06/21/22	230	ND	ND	ND
03/21/22	ND	ND	ND	ND
12/22/21	ND	ND	ND	ND
09/24/21	ND	ND	ND	ND
12/23/20	ND	ND	ND	ND

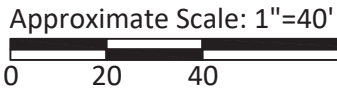
 = Groundwater Analytical Results in ug/L;
 Gas/DSL/Oil = Gasoline/diesel/oil total petroleum hydrocarbons
 BTEX = Benzene, toluene, ethylbenzene, xylenes
 VOCs = Volatile organic compounds, H = Hexane
 Naph. = Naphthalene
 Pb = Lead
 x = The sample chromatographic pattern does not resemble the fuel standard used for quantitation. As noted in previous reports, the analytical chemist reported that the diesel concentrations were an overlap of gasoline.
 ND = Not detected above laboratory detection limits
 Bold results (if any) indicate concentrations above laboratory detection limits
 Bold and highlighted results (if any) indicate concentrations above MTCA Method A Groundwater Cleanup Levels


 = Groundwater flow direction
 = Test probe by RGI, 03/03/21
 = Groundwater monitoring well by RGI,
 = Stormwater catch basin
 = Test probe by RGI, 08/08/19
 = Test probe by RGI, 02/21/19
 = Property boundary

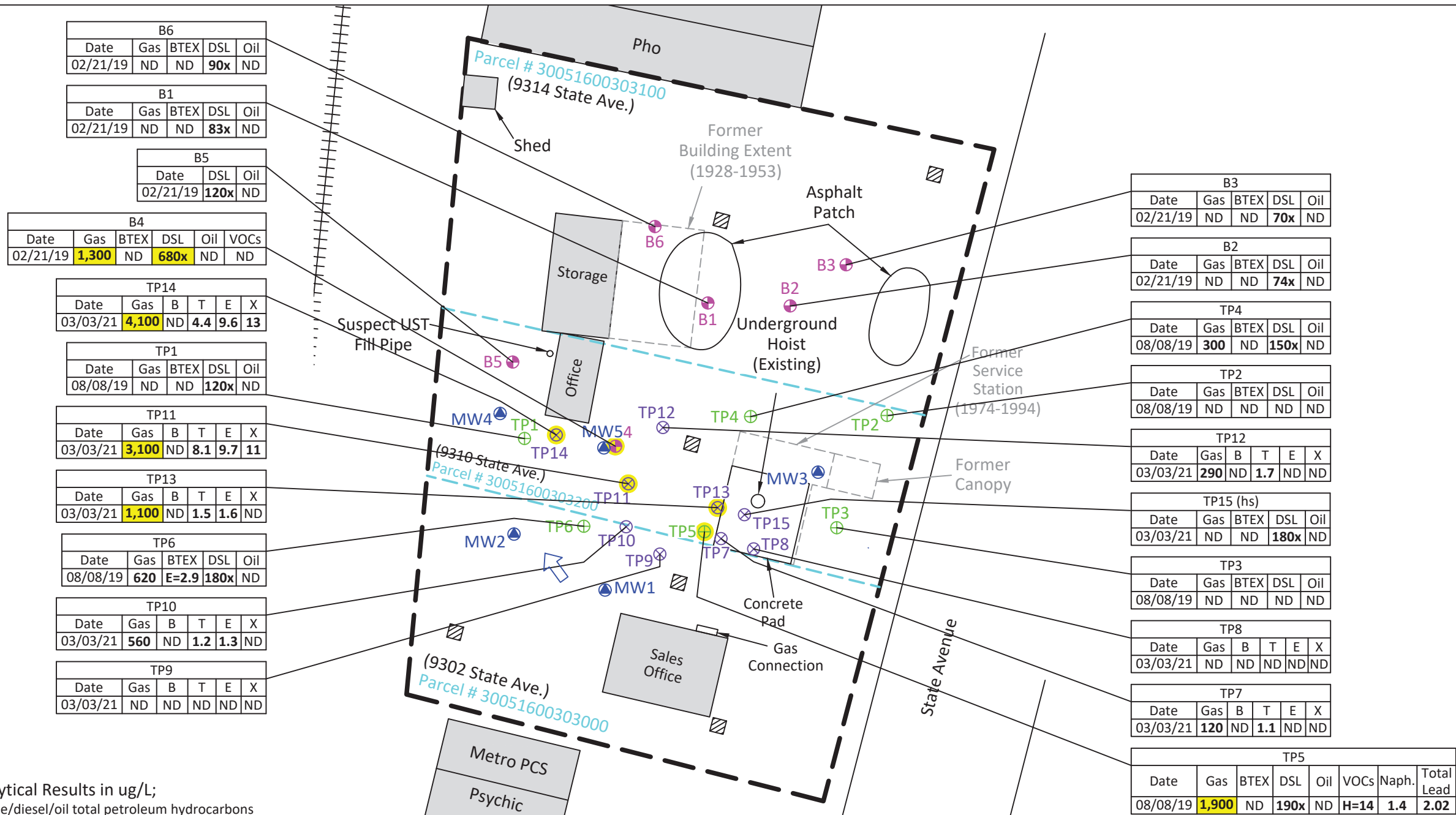


[Note: PersulfOx® chemical injections and additional subsurface investigation were performed in June of 2021 and July of 2021. This work and findings has been prepared under separate cover.]

 = Groundwater contours generated using Surfer Software (based on Kriging method).
 Contours based on 09/26/22 water level measurements.
 (13.88') = Groundwater elevation measured on 09/26/22 by RGI



 <div> Corporate Office 17522 Bothell Way Northeast Bothell, Washington 98011 Phone: 425.415.0551 Fax: 425.415.0311 </div>	Marysville Excellent Choice Auto Sales		Figure 2
	RGI Project Number 2018-244-5	Groundwater Monitoring Well Analytical Results & Groundwater Flow Direction	Date Drawn: 10/2022
	Address: 9302 to 9314 State Avenue, Marysville Washington 98270		



= Groundwater Analytical Results in ug/L;
Gas/DSL/Oil = Gasoline/diesel/oil total petroleum hydrocarbons
BTEX = Benzene, toluene, ethylbenzene, xylenes
VOCs = Volatile organic compounds, H = Hexane
Naph. = Naphthalene
Pb = Lead
hs = Headspace was present in the container used for analysis.
x = The sample chromatographic pattern does not resemble the fuel standard used for quantitation. As noted in previous reports, the analytical chemist reported that the diesel concentrations were an overlap of gasoline.
ND = Not detected above laboratory detection limits
Bold results (if any) indicate concentrations above laboratory detection limits
Bold and highlighted results (if any) indicate concentrations above MTCA Method A Groundwater Cleanup Levels

= Groundwater flow direction
 = Test probe by RGI, 03/03/21
 = Groundwater monitoring well by RGI, 12/20 to 12/21
 = Stormwater catch basin
 = Test probe by RGI, 08/08/19
 = Test probe by RGI, 02/21/19
 = Property boundary

[Note: PersulfOx® chemical injections and additional subsurface investigation were performed in June of 2021 and July of 2021. This work and findings are presented under separate cover.]

[Note: Groundwater results from groundwater monitoring wells take precedent over test probe grab sample results.]

