



Electronic Copy

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Region Office  
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April 11, 2023

Brett Olson  
Alfy's Pizza  
9330 State Avenue, Suite B  
Marysville, WA 98270-2259  
([bbbtolson@aol.com](mailto:bbbtolson@aol.com))

**Re: Further Action at the following Site:**

- **Site Name:** Alfys Pizza Container
- **Site Address:** 2317 Broadway, Everett, WA 98201
- **Facility/Site No.:** 75334599
- **Cleanup Site ID:** 16656
- **VCP Project No.:** NW3347

Dear Brett Olson:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Alfys Pizza Container facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

**Issue Presented and Opinion**

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Is further remedial action necessary to clean up contamination at the Site?

**YES. Ecology has determined that further remedial action is necessary to clean up contamination at the Site.**

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

**Description of the Site**

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

- Gasoline, diesel, and oil range total petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O,

respectively), benzene, total xylenes, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the soil.

- TPH-G, TPH-D, TPH-O, benzene, and cPAHs into the groundwater.

**Enclosure A** includes a detailed description and diagrams of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel associated with this Site is affected by other sites.

### **Basis for the Opinion**

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This opinion is based on the information contained in the following documents:

1. Puget Environmental PLLC., *Limited Site Assessment Report, Former Alfy's Pizza, 2317 Broadway Avenue, Everett, Washington 98201*, November 21, 2021.
2. Puget Environmental PLLC, *Excavation and Well installation Report, Former Alfy's Pizza, 2317 Broadway Avenue, Everett, Washington 98201*, April 8, 2022.

The documents are accessible in electronic form from the [Site web page](#).<sup>1</sup> The complete records are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our [Public Records Request page](#) <sup>2</sup> to submit a public records request or get more information about the process. If you require assistance with the process, you may contact the Public Records Officer at [publicrecordsofficer@ecy.wa.gov](mailto:publicrecordsofficer@ecy.wa.gov) or 360-407-6040.

This opinion is void if any of the information contained in those documents is materially false or misleading.

### **Analysis of the Cleanup**

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Ecology has concluded that **further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

#### **1. Characterization of the Site.**

Ecology has determined characterization of the Site is not sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

##### **a. Soil characterization.**

Site soil is contaminated with TPH-G, TPH-D, and TPH-O, benzene, total xylenes, and cPAHs above the MTCA Method A cleanup levels. The source of the contamination is from past operations of the former gasoline service station (**Enclosure A, Figure 2**). One

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/16656>

<sup>2</sup> <https://ecology.wa.gov/Footer/Public-records-requests>

underground storage tank (UST) of unknown contents was removed from the southwest portion of the Property in December 2021; it is unknown when the other two USTs (waste oil and fuel oil) were removed.

Contaminated soil was confirmed in the southwest corner of the Property prior to and after UST removal activities in 2021. Soil samples collected at the lateral and vertical (18 feet below the ground surface [bgs]) limits of the UST removal excavation exceed MTCA Method A cleanup levels. The excavation extended to the west Property boundary and across the south Property boundary (**Enclosure A, Figure 3**).

The lateral extent of the soil contamination has not been defined in the southwest corner of the Property (downgradient direction) and it has not been determined whether soil contamination extends off the Property at that location. The vertical extent of soil contamination has also not been delineated (**Enclosure A, Figures 2, 4, and 5**).

Additional soil sampling is needed to define the lateral and vertical extents of the soil contamination.

**b. Groundwater characterization.**

Site groundwater is contaminated with TPH-G, TPH-D, and TPH-O, benzene, and cPAHs above the MTCA Method A cleanup levels. Six groundwater monitoring wells (MW-1 through MW-6) were installed on the Site. Groundwater from monitoring wells MW-4 and MW-6 (downgradient wells) and from boring P-1 contained contaminants exceeding the MTCA Method A cleanup levels. The groundwater plume has not been delineated to the south or southwest. It is unknown whether groundwater contamination has migrated off the Property toward the southwest (downgradient direction). Refer to **Enclosure A, Figures 3, 4, and 6**.

Additional groundwater monitoring wells are needed to delineate the extent of the contaminated groundwater plume and to determine whether groundwater contamination has migrated off the Property.

**c. Data Gaps in the Report(s).**

- The [cleanup process under MTCA](https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process)<sup>3</sup> requires a Remedial Investigation (RI) to fully characterize the Site and establish cleanup standards, per WAC 173-340-350(7). The completed Site RI should be comprehensive and will be the basis for evaluation and selection of a cleanup action that meets the requirements of WAC 173-340-350(8) and WAC 173-340-360(3).
- A RI report needs to contain a summary of results from previous investigations on the Property, which has not been provided. This includes a history of past use as an automotive service station and whether there have been prior releases at the Site.

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<sup>3</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

There has been no documentation provided regarding the decommissioning of the three USTs. To characterize the Site, a comprehensive understanding of the Site's past usages need to be researched, and the results of all previous investigations need to be documented and summarized.

- Soil and groundwater results for TPH-D and TPH-O must be added together (TPH[D+O]) and compared to the Method A soil and groundwater cleanup level, per the [Implementation Memorandum #4](#) <sup>4</sup>.
- Upgradient borings (MW-1 and MW-2) contained TPH(D+O) close to MTCA Method A cleanup level in samples collected at 9 feet bgs. Although the soil samples did not exceed the cleanup level, the high concentrations in an area with no known sources warrants further investigation. The potential source of the TPH-D and TPH-O soil contamination in this portion of the Property needs to be explained or investigated.
- Soil and groundwater around the former waste oil UST, fuel oil UST, and service station building have not been fully investigated. The historical presence of a waste oil UST and potential hoists require analysis of lead, polychlorinated biphenyls (PCBs), and fuel additives per WAC 173-340-900 (Table 830-1).
- cPAHs exceeding the MTCA Method A cleanup levels were found in soil and groundwater samples collected in the southwest corner of the Property prior to UST removal activities; however, cPAH analysis was not conducted on any soil sample collected from the UST excavation or on any groundwater sample collected from the monitoring wells installed on the Property following the UST removal. The extent of cPAH contamination in soil and groundwater has not been defined. Please refer to the [Implementation Memorandum No. 10](#) <sup>5</sup> for evaluating the human health toxicity of cPAHs using toxicity equivalency factors.
- A [UST Site Check/Site Assessment Checklist form](#) <sup>6</sup> must be completed and submitted to Ecology along with the decommissioning report for permanent UST closure activities, per WAC 173-360A-0730. Required UST closure documentation has not been provided for any of the three decommissioned USTs.
- Monitoring wells were surveyed to an arbitrary vertical datum. Monitoring wells need to be surveyed to the North American Vertical Datum of 1988 (NAVD88) per WAC 173-340-840(e). Groundwater elevations need to be measured multiple times during the year (at least once in the dry season and once in the wet season) to determine any seasonal variations in the underlying groundwater table.
- According to the well reports found in the [Ecology Well Report Database](#), <sup>7</sup> there have been investigations conducted on the Property in August 2021, February 2022, and March 2022. These investigations should be summarized as part of the Site characterization. The well reports for the existing monitoring wells (MW-1 through

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<sup>4</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/0409086.html>

<sup>5</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1509049.html>

<sup>6</sup> <https://apps.ecology.wa.gov/publications/documents/ecy010158.pdf>

<sup>7</sup> <https://appswr.ecology.wa.gov/wellconstruction/map/WCLSWebMap/default.aspx>



MW-6) were not found in the database; these need to be submitted to Ecology.

- The *Limited Site Assessment Report* and *Excavation and Well Installation Report* were not stamped by a Washington-state licensed geologist/hydrogeologist or engineer. Reports that contain geological/hydrogeological descriptions and interpretations need to be submitted under the seal of an appropriately licensed professional, as required by Chapters 18.43 and 18.220 RCW.

Please resolve these data gaps in your remedial investigation (see **Next Steps**).

**d. Vapor intrusion evaluation.**

The Property is currently used for commercial purposes and the building is vacant; however, it is not known who the future tenant will be. Based on zoning (Mixed Urban), there is a potential that future businesses could include day care facilities and hotels. WAC 173-340-702 requires that cleanup standards and actions must be protective of current and potential future Property and resources uses. This means that all developable areas within the appropriate lateral screening distance will need a [vapor intrusion \(VI\)](#) <sup>8</sup> evaluation whether a building currently exists or not.

The following soil samples contained TPH-G above the recommended vapor intrusion threshold of 250 mg/kg for weathered gasoline and were collected at or within the lateral inclusion zone of 30 feet from the existing building and a vertical separation of 15 feet bgs:

- Sample P1-15 at 15 feet bgs, TPH-G is 1,400 mg/kg
- Sample P3-5 at 5 feet bgs, TPH-G is 750 mg/kg

TPH-G and benzene were detected in sample W-1 (boring P-1) in October 2021 and in sample MW-4 in March 2022. Boring P-1 is located approximately 30 feet south of the building and MW-4 is located approximately 60 feet south of the building.

- Sample W-1, TPH-G is 2,000 µg/L (2 mg/L), benzene is 2 µg/L (0.002 mg/L)
- Sample MW-4, TPH-G is 320 µg/L (0.32 mg/L), benzene is 24 µg/L (0.024 mg/L)

The depth to groundwater at the Site in March 2022 was 4 to 6 feet bgs, which is within the vertical separation inclusion zone of 6 feet for benzene less than 5 mg/L and TPH-G less than 30 mg/L. The benzene concentration of 24 µg/L exceeds the Method B cancer groundwater screening level of 2.4 µg/L (Vapor Intrusion Method B Groundwater Screening Level) in Ecology's [Cleanup Levels and Risk Calculations \(CLARC\) Database](#) <sup>9</sup>.

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<sup>8</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview>

<sup>9</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC/Data-tables>

A Tier 1 VI evaluation is needed for the Site building and potential buildings or uses in the future. The VI evaluation should be conducted consistent with the [Guidance for Evaluating VI in Washington State: Investigation and Remedial Action](#),<sup>10</sup> dated March 2022.

**e. Terrestrial Ecological Evaluation.**

A [Terrestrial Ecological Evaluation \(TEE\)](#)<sup>11</sup> has not been completed for the Site. A TEE is required per WAC 173-340-7490 to be protective of terrestrial species are applicable to the Site. The first step is to determine if the Site is excluded from having to conduct a TEE. A [TEE Form](#)<sup>12</sup> needs to be completed. If the Site does not qualify for an exclusion, then the process outlined in WAC 173-340-7490 must be followed to determine protective cleanup levels for the Site.

Please complete a TEE and submit it to Ecology.

**f. Environmental Information Management (EIM).**

All environmental monitoring data, including data from previous investigations, are required to be entered into to the EIM system consistent with procedures specified by Ecology and as required by WAC 173-340-840(5). All data must be entered into the EIM to receive a final Ecology opinion for this Site. For guidance regarding EIM submittals and tools, please refer to the [EIM web page](#).<sup>13</sup> Contact information for the EIM Team is also provided on that web page.

Please submit all data, including soil, groundwater, and VI data, to the EIM.

**2. Establishment of cleanup standards.**

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

**a. Soil.**

**Cleanup Levels.** The Site does not meet the MTCA definition of an industrial property, and the current Property zoning of Mixed Urban allows for the operation of day care facilities and hotels; therefore, MTCA Method A soil cleanup levels for unrestricted land uses which are based on protection of groundwater are appropriate preliminary cleanup levels (WAC 173-340-740(2); Table 740-1). MTCA Method A cleanup levels are also considered appropriate of the leaching to groundwater and direct contact pathways. These levels should be used as screening levels until final cleanup levels are selected. Final cleanup levels can be established based on the results of the TEE.

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<sup>10</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/0909047.html>

<sup>11</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Terrestrial-ecological-evaluation>

<sup>12</sup> <https://apps.ecology.wa.gov/publications/documents/ecy090300.pdf>

<sup>13</sup> <https://ecology.wa.gov/Research-Data/Data-resources/Environmental-Information-Management-database>

**Points of Compliance.** The point of compliance for the Site is based on the protection of groundwater and extends Site-wide throughout the soil profile and may extend below the water table, per WAC 173-340-740(6)(b). This is the appropriate soil point of compliance for the Site.

**b. Groundwater.**

**Cleanup Levels.** The highest beneficial use for groundwater is considered to be as a potable source, unless it can be demonstrated that groundwater is non-potable. MTCA Method A groundwater cleanup levels are protective of potable use and are therefore appropriate (WAC 173-340-720(3); Table 720-1).

**Points of Compliance.** The standard point of compliance is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected, per WAC 173-340-720(8)(b). This is the appropriate groundwater point of compliance for the Site.

**c. Air.**

**Cleanup Levels.** The MTCA Method B sub-slab soil gas screening levels and groundwater screening levels are appropriate for assessing the VI pathways at the Site. The MTCA Method B indoor air cleanup levels are appropriate for potential future indoor and ambient air samples collected at the Site. These Method B levels are available in Ecology's [Cleanup Levels and Risk Calculation \(CLARC\) Database](#).<sup>14</sup>

**Points of Compliance.** The standard point of compliance for air is in the ambient air throughout the Site per WAC 173-340-750(6). This is the appropriated air point of compliance for the Site.

**3. Selection of cleanup action.**

Ecology has determined that insufficient Site characterization data does not allow for selection of a cleanup action that meets the substantive requirements of MTCA at this time. The process to select an appropriate cleanup action includes the completion of the following:

- A remedial investigation (RI) to fully characterize the Site.
- A feasibility study (FS) and disproportionate cost analysis (DCA) to evaluate and select an appropriate cleanup action.
- The preparation of a FS /DCA may not be necessary if the Site meets the eligibility criteria for [Model Remedies](#).<sup>15</sup>

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<sup>14</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC/Data-tables>

<sup>15</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/MTCA-model-remedies>

## 5. Next steps.

Ecology appreciates your efforts to date in conducting an initial Site characterization, decommissioning USTs, and removing contaminated soil on the Property.

Before further work is completed, Ecology encourages the development of an RI work plan to ensure that sufficient data are collected to fully characterize the Site so an adequate Site conceptual model can be developed, and cleanup alternatives can be evaluated and selected.

The following guidance documents and resources are provided to assist you in preparing an RI workplan:

- The [RI Checklist](#)<sup>16</sup> outlines the required elements necessary to complete an RI under MTCA (WAC 173-340-350). The required elements of an FS are found in the [FS Checklist](#).<sup>17</sup>
- It is the responsibility of the property owner to assure that subsurface investigations and cleanup projects comply with other state and local rules, such as [Cultural Resources Regulations](#).<sup>18</sup>
- Guidance regarding model remedies for soil and groundwater, including eligibility criteria, can be found in the following: [Model Remedies for Sites with Petroleum Contaminated Soils](#)<sup>19</sup> and [Model Remedies for Site with Petroleum Impacts to Groundwater](#).<sup>20</sup>
- Please refer to the [Guidance for Remediation of Petroleum Contaminated Sites](#)<sup>21</sup> for guidance on conducting investigations and cleanup actions at petroleum contaminated Sites.

Ecology applauds your initiative and interest in the Voluntary Cleanup Program and looks forward to working with you during the cleanup process to bring the Site to closure.

## Limitations of the Opinion

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### 1. 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.

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<sup>16</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1609006.html>

<sup>17</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1609007.html>

<sup>18</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1909059.html>

<sup>19</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1509043.html>

<sup>20</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1609057.html>

<sup>21</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1009057.html>

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).

**2. 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 and WAC 173-340-545.

**3. 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.

#### Contact Information

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Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our main [VCP web page](#).<sup>22</sup> If you have any questions about this opinion, please contact me by phone at 206-556-5258 or email at [kim.vik@ecy.wa.gov](mailto:kim.vik@ecy.wa.gov).

Sincerely,



Kim Vik, LG  
VCP Site Manager  
Toxics Cleanup Program, NWRO

Enclosures (1): A – Description and Diagrams of the Site

cc: Matt Brockett, Alf's Pizza ([mattbrockett@alfyspizza.com](mailto:mattbrockett@alfyspizza.com))  
John Meyer, Puget Environmental PLLC ([johnmeyer@pugetenvironmental.com](mailto:johnmeyer@pugetenvironmental.com))  
Sonia Fernández, VCP Coordinator ([sonia.fernandez@ecy.wa.gov](mailto:sonia.fernandez@ecy.wa.gov))

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<sup>22</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

**Enclosure A**

**Description and Diagrams of the Site**

## Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions in this letter.

**Site:** The Site is defined as releases of the following at 2317 Broadway, Everett, Washington (Property, **Figure 1**).

- Total petroleum hydrocarbons in the gasoline, diesel, and oil ranges (TPH-G, TPH-D, TPH-O), benzene, total xylenes, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) in soil.
- TPH-G, TPH-D, TPH-O, benzene, and cPAHs in groundwater.

The rectangular-shaped Property covers approximately 0.69 acre and is identified as Snohomish County Parcel Number 00439149500700. The Property is located on the northeast corner of the intersection of 24<sup>th</sup> Street and Broadway in Everett, Washington.

According to MTCA, the Site is defined as all areas where contamination has come to be located.

**Area and Property Description:** The Property is in an area zoned as Mixed Urban by the City of Everett. This Mixed Urban zoning is predominantly along Broadway. Properties adjacent to those along Broadway are mixed commercial and residential.

The current uses of the surrounding properties include:

- North: Tampico Mexican restaurant
- South: 24<sup>th</sup> Street and Tim's Bike Shop (across the street)
- West: Broadway and Broadway Used Car Lot (CSID 12570; cleanup started) (across the street)
- East: an alley and single-family, residential houses (across the alley)

**Property History and Current Use:** The Property is currently occupied by one building (former Alf's Pizza). The business is closed, and the building is vacant. The Property is completely fenced to prohibit access. The surface around the existing building is covered with asphalt parking.

Historically, a gasoline service station operated on the south portion of the Property. The former gasoline station consisted of an auto repair building, a gasoline station building, a pump island, and three underground storage tanks (USTs). Two of the USTs were removed on unknown dates before November 2021 (one waste oil and one fuel oil). The third UST (unknown contents) was removed in December 2021. Information regarding the UST decommissioning, UST sizes, and conditions was not provided. **Figure 2** shows the current Alf's Pizza building and the former gasoline service station features and configuration.

The current building is in the process of being leased by a new tenant.

**Sources of Contamination:** A gasoline service station was historically located on the south portion of the Property before the construction of the Alfy's Pizza building (**Figure 3**). It is not known how long the service station operated or when it was demolished. The service station included automotive repair services and gasoline sales. There were three USTs associated with the operation of the former service station. Two USTs (waste oil and fuel oil) were removed prior to November 2021, and the third UST was removed in December 2021.

**Physiographic Setting:** The Site is situated at an elevation of approximately 83 to 86 feet above mean sea level. The land surface at the Site is relatively flat. The local topography slopes to the southeast, towards the Snohomish River.

**Surface/Storm Water System:** The nearest surface water bodies include the Snohomish River, located approximately 5,200 feet southeast of the Site and the Port of Everett East Waterway (Possession Sound), located approximately 4,200 feet to the west. Storm water from the Property and adjoining properties flow to and are conveyed by the City of Everett municipal storm drainage system.

**Ecological Setting:** The Property is in a developed area and is surrounded by roadways and commercial buildings. The area along Broadway is predominantly commercial, and land surfaces are primarily covered by buildings and concrete and/or asphalt pavements, with limited landscaping. The areas adjacent to the businesses on Broadway, including the area east of the Property, are predominantly residential.

**Geology:** Soil in the area of the Property is shown as quaternary Vashon till (Qvt), which is generally described as poorly sorted, non-stratified till moraine deposit made up of clay, silt, sand, pebbles, and cobbles.<sup>23</sup> Borings and monitoring wells drilled on the Site encountered fill (up to 12 feet thick) described as fine- to medium-grained sand with gravel, underlain by silty clay to clayey silt to the maximum explored depth of approximately 18 feet below the ground surface (bgs).

**Groundwater:** Six groundwater monitoring wells were installed on the Property at total depths of 11 to 14 feet bgs. Shallow groundwater was encountered at 4 to 5 feet bgs in March 2022. Based on the information provided by onsite monitoring wells, the groundwater flow direction is toward the southwest (**Figure 3**). Monitoring wells located on the north portion of the Property (completed to 11 feet bgs) did not contain groundwater.

Since groundwater was not encountered in all the monitoring wells on the Property, the groundwater may be perched and discontinuous; however, that determination cannot be made without additional groundwater data. Groundwater was encountered at 41.5 feet bgs at the Site across the street (Broadway Used Car Lot), which likely represents the regional water table.

**Water Supply:** Drinking water is provided to the Property by the City of Everett Public Works. The source of the drinking water for the City of Everett is the Sultan River Watershed, located approximately 20 miles east of Everett on the west slope of the Cascade Mountains. Water is stored in the Spada Lake Reservoir (held back by the Culmback Dam on the Sultan River) and Chaplain Reservoir located west of the Spada Lake Reservoir

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<sup>23</sup> USGS Geologic Map of the Everett 7.5-Minute Quadrangle, Snohomish County, Washington, 1985.



## **Release and Extent of Soil and Groundwater Contamination:**

### **October 2021 – Site Investigation**

Four direct-push soil borings (P-1 through P-4) were advanced on the Property to approximately 16 to 20 feet bgs. TPH-G (up to 1,400 mg/kg) and TPH-D+TPH-O (19,900 mg/kg), benzene (0.36 mg/kg), total xylenes (13 mg/kg), and cPAHs (toxic equivalent concentration [TEQ] of 0.238 mg/kg) exceeding the MTCA Method A cleanup levels were discovered in soil up to 15 feet bgs in the southwest corner of the Property near the existing UST. A groundwater sample collected from one of the borings (P-1) also contained TPH-G (2,000 µg/L), TPH-D+TPH-O (3,200 µg/L), and cPAHs (TEQ of 5.692 µg/L) above MTCA Method A cleanup levels (**Figure 2**).

### **2021-2022 – UST Removal**

One UST was removed from the southwest corner of the Property in December 2021. The condition of the UST or details regarding the decommissioning were not documented.

Performance and compliance soil samples were collected during the soil excavation activities in December 2021 and January 2022. Six of the compliance soil samples collected from the southwest sidewall and the bottom (18 feet bgs) of the excavation contained TPH-G (up to 310 mg/kg at 8 feet bgs) and benzene (up to 3.9 mg/kg at 16 feet bgs) exceeding the MTCA Method A cleanup levels. None of the soil samples were analyzed for cPAHs. **Figure 4** shows the excavation soil sample locations and exceedances.

The soil was described as “saturated” and “wet”; however, there was no mention of groundwater pooling in the excavation or if groundwater was pumped from the excavation. Approximately 2,000 tons of petroleum contaminated soil were removed and disposed of offsite. The excavation was reportedly backfilled with clean imported fill.

### **March 2022 – Monitoring Well Installation and Groundwater Sampling**

Six groundwater monitoring wells were installed on the Property in March 2022. The soil samples collected from MW-1 and MW-2 at 9 feet bgs contained TPH-D+TPH-O (1,850 mg/kg and 1,999 mg/kg, respectively), which are just under the Method A cleanup level of 2,000 mg/kg (**Figure 5**). All other results were either below the method reporting limits (MRLs) or below the MTCA Method A cleanup levels. Both wells were found to be dry at the time of groundwater sampling. None of the soil samples were analyzed for cPAHs.

Two wells located in the southwest portion of the Property (MW-4 and MW-6) contained contaminants in groundwater above the MTCA Method A cleanup levels. MW-4 contained benzene at 24 µg/L and MW-6 contained TPH-D at 570 µg/L (**Figure 6**). It should be noted that the MRL for TPH-O (sample from MW-6) was 600 µg/L, which is above the Method A cleanup level of 500 µg/L for TPH-D+TPH-O. None of the groundwater samples were analyzed for cPAHs.

Based on observations during an Ecology Site visit on March 6, 2023, the parking area has been recently re-paved. Ecology did not have access to the Site due to the fences, so the presence of the monitoring wells could not be confirmed. Ecology was informed by the owner that the monitoring wells were still

present on the Property. Well construction and/or decommissioning well reports could not be found on the Ecology Well Record database.

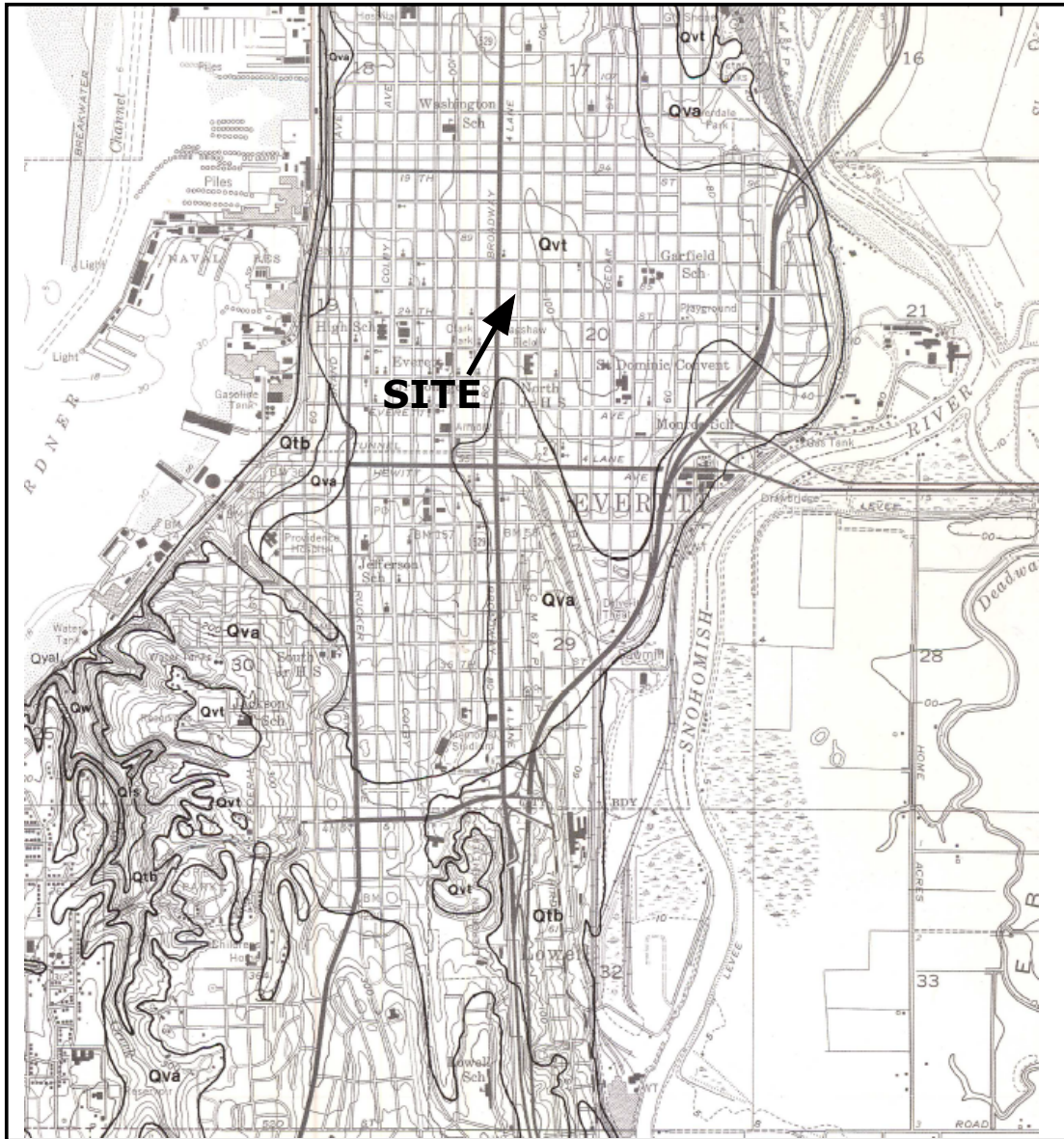
#### **Other Investigations Not Reported (August 2021, February 2022, and March 2022)**

According to the well reports found in the Ecology Well Report database for the Property, there were investigations conducted on the Property in August 2021, February 2022, and March 2022.

- August 19, 2021: Six borings (B2, B3B, and B4 through B7) were drilled to 20 feet bgs and sampled for soil. Groundwater was encountered in one boring at 10 feet bgs; all the other borings were dry. All the borings were decommissioned on the same day they were drilled (driller: ESN Northwest; construction notice of intent [NOI]: SE78932; decommissioning NOI: AE68272).
- February 25, 2022: One to two geotechnical borings were drilled on the Property to 20 feet bgs. There were no identifiers on the well reports and no mention of soil or groundwater sampling. The borings were decommissioned the same day they were drilled (driller: Gregory Drilling; construction NOI: SE81030; decommissioning NOI: AE71364; Consulting Firm: Terracon).
- March 15 and 16, 2022: Ten borings (B1 through B10) were drilled between 10 and 24 feet bgs and sampled for groundwater. The well reports document that soil-gas samples were also collected at 5 feet bgs from at least four borings (B1, B3, B7, and B8). Groundwater was encountered in all 10 borings between 3.5 to 10 feet bgs. All the borings were decommissioned on the same day they were drilled (driller: Holocene Drilling; construction NOI: EE09047 and SE81239; decommissioning NOI: AE71642 and AE71641).

None of these borings have been mentioned in the reports reviewed by Ecology. The locations of these borings are unknown.

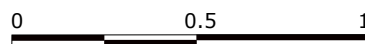
## Site Diagrams



From the Department of the Interior U.S. Geological Survey - Everett, Washington 7.5-Minute Quadrangle, 1985

# FIGURE 1

Reference: "Limited Site Assessment Report," Puget Environmental PLLC, November 24, 2021.



Approximate Scale (Feet)

Dimensions and locations are approximate.



**NORTH**

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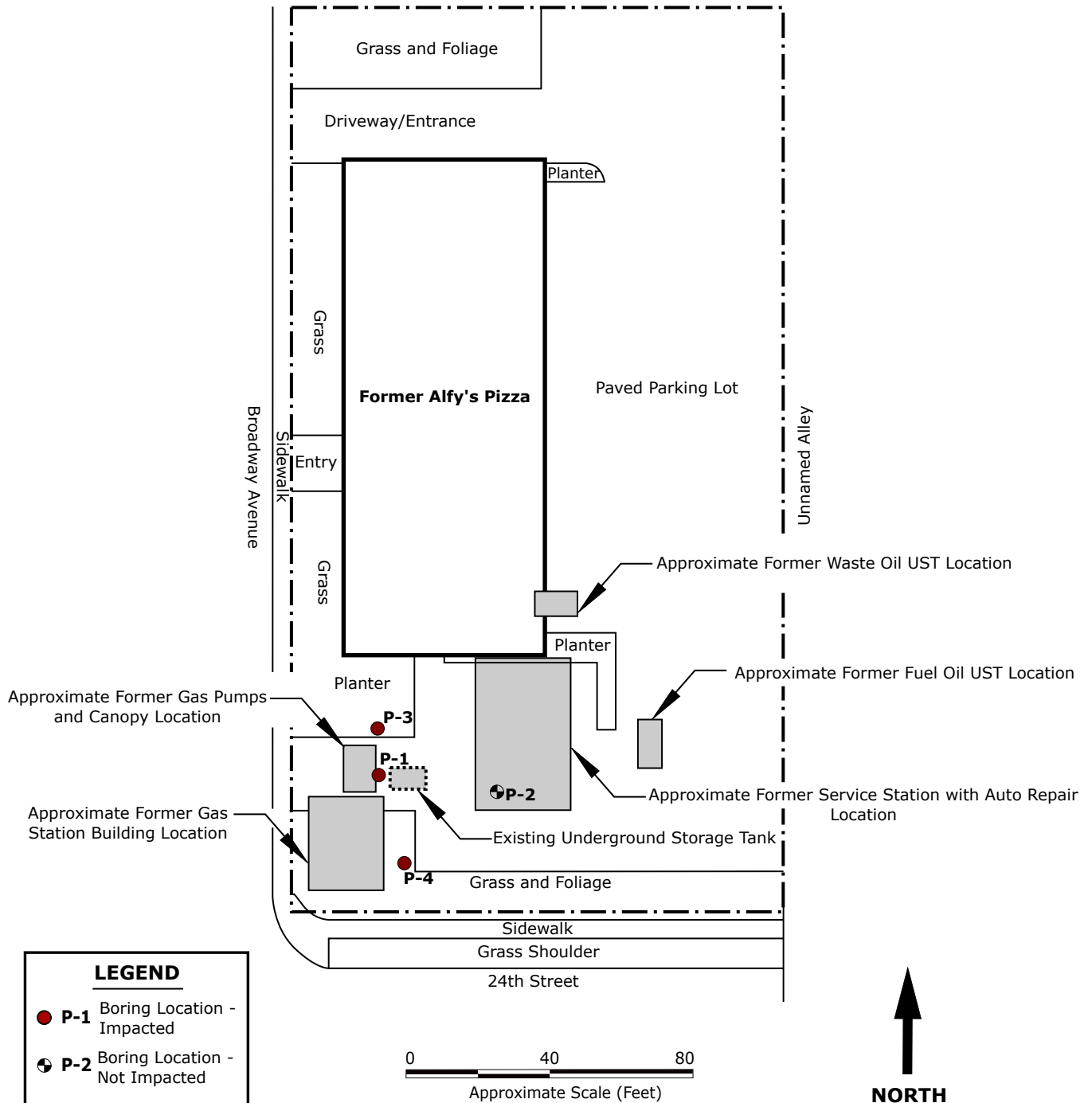
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**FIGURE 1**  
SITE LOCATION

**FIGURE 2**

Reference: "Limited Site Assessment Report," Puget Environmental PLLC, November 24, 2021.



Former service station locations are taken from prior consultant's reports. Dimensions and locations are approximate.

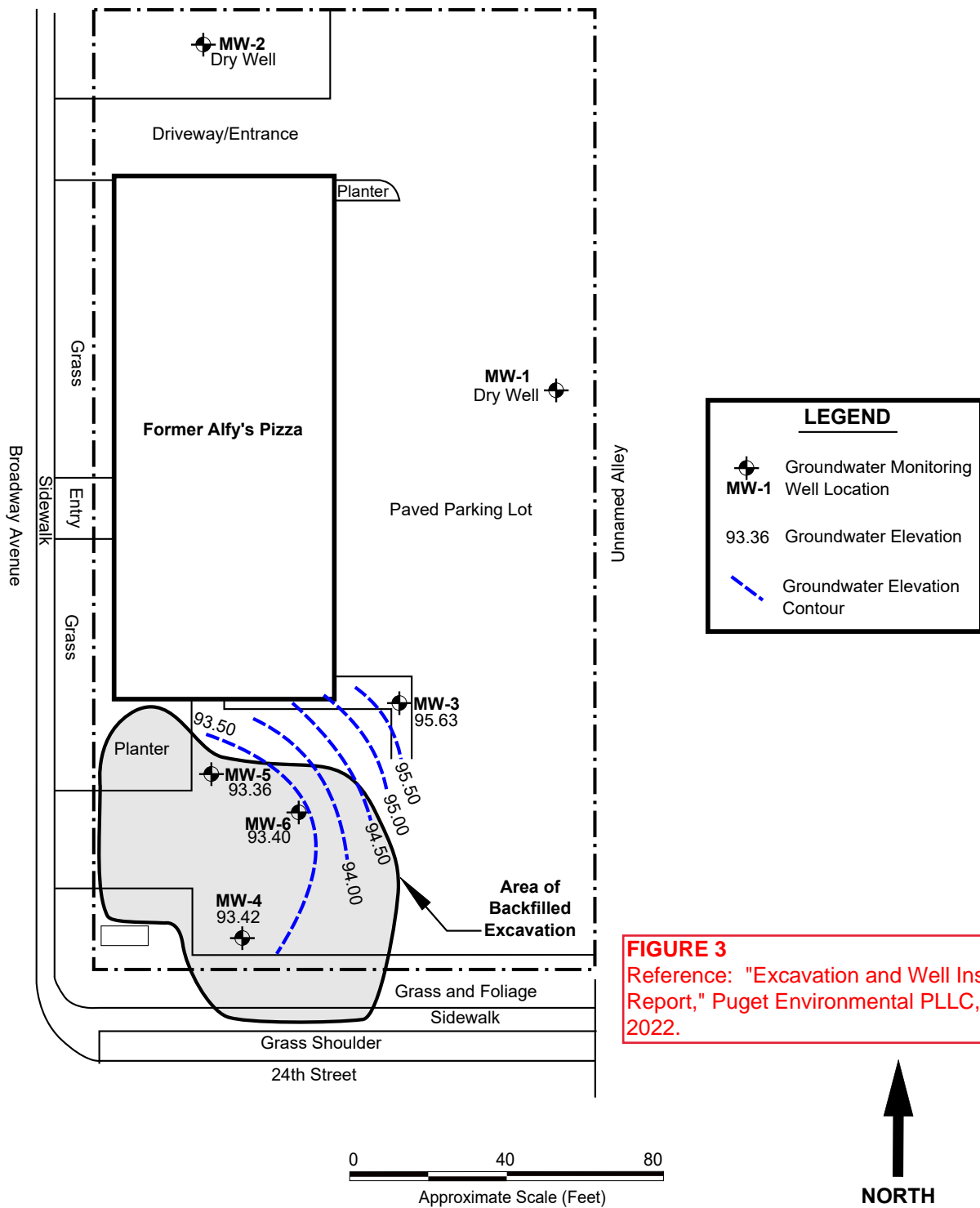
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**FIGURE 3**  
DIRECT-PUSH BORING  
LOCATIONS



**FIGURE 3**  
Reference: "Excavation and Well Installation Report," Puget Environmental PLLC, April 8, 2022.

Dimensions and locations are approximate.

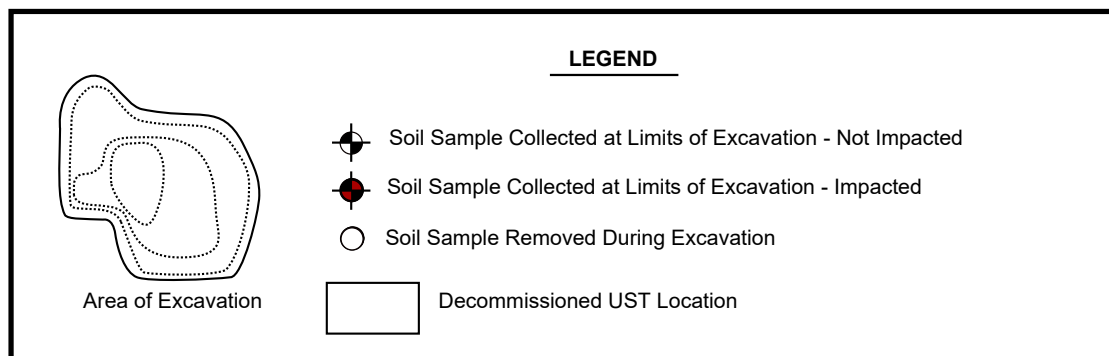
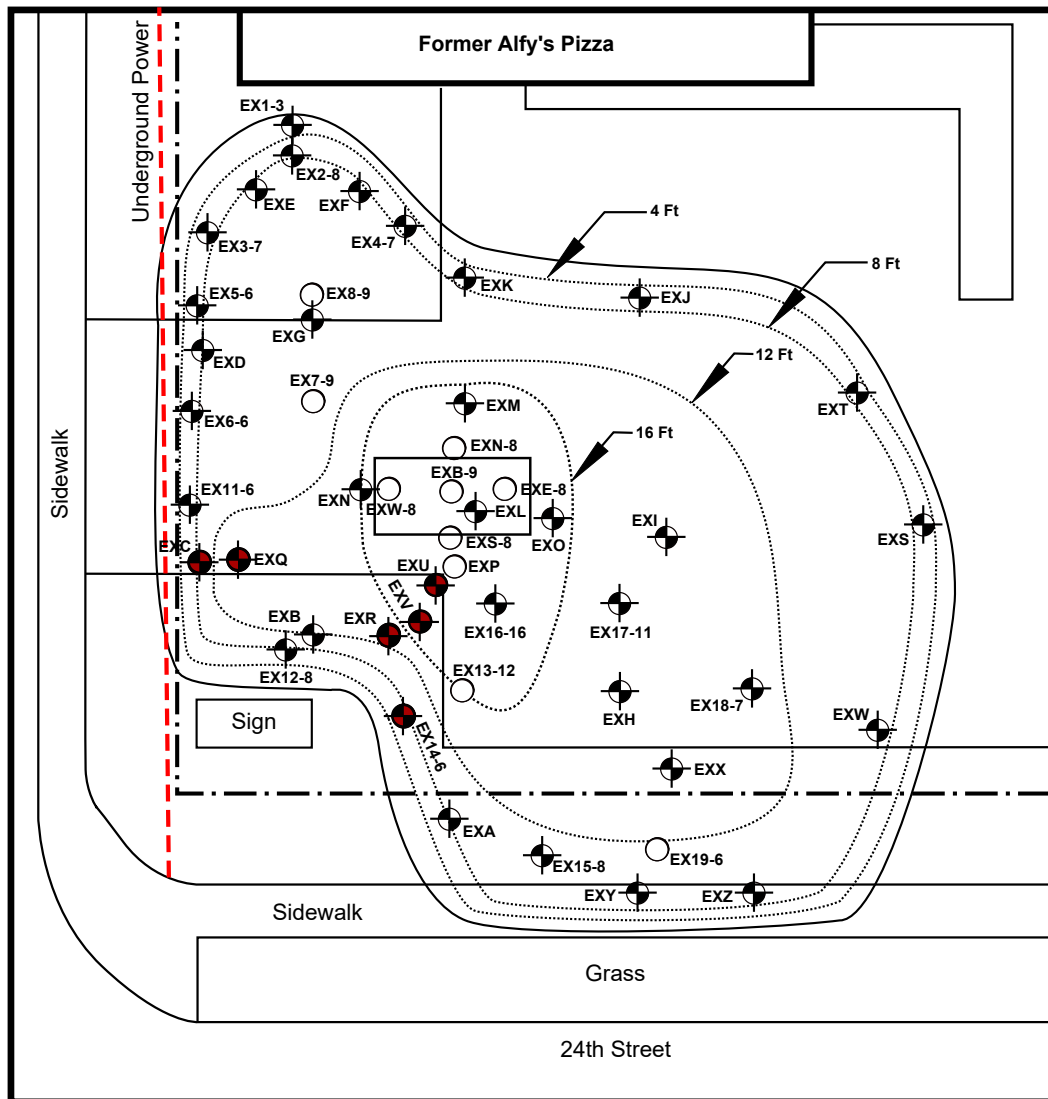
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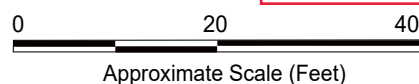
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**FIGURE 7**  
GROUNDWATER ELEVATION  
CONTOUR MAP

**FIGURE 4**

Reference: "Excavation and Well Installation Report," Puget Environmental PLLC, April 8, 2022.



Dimensions and locations are approximate.

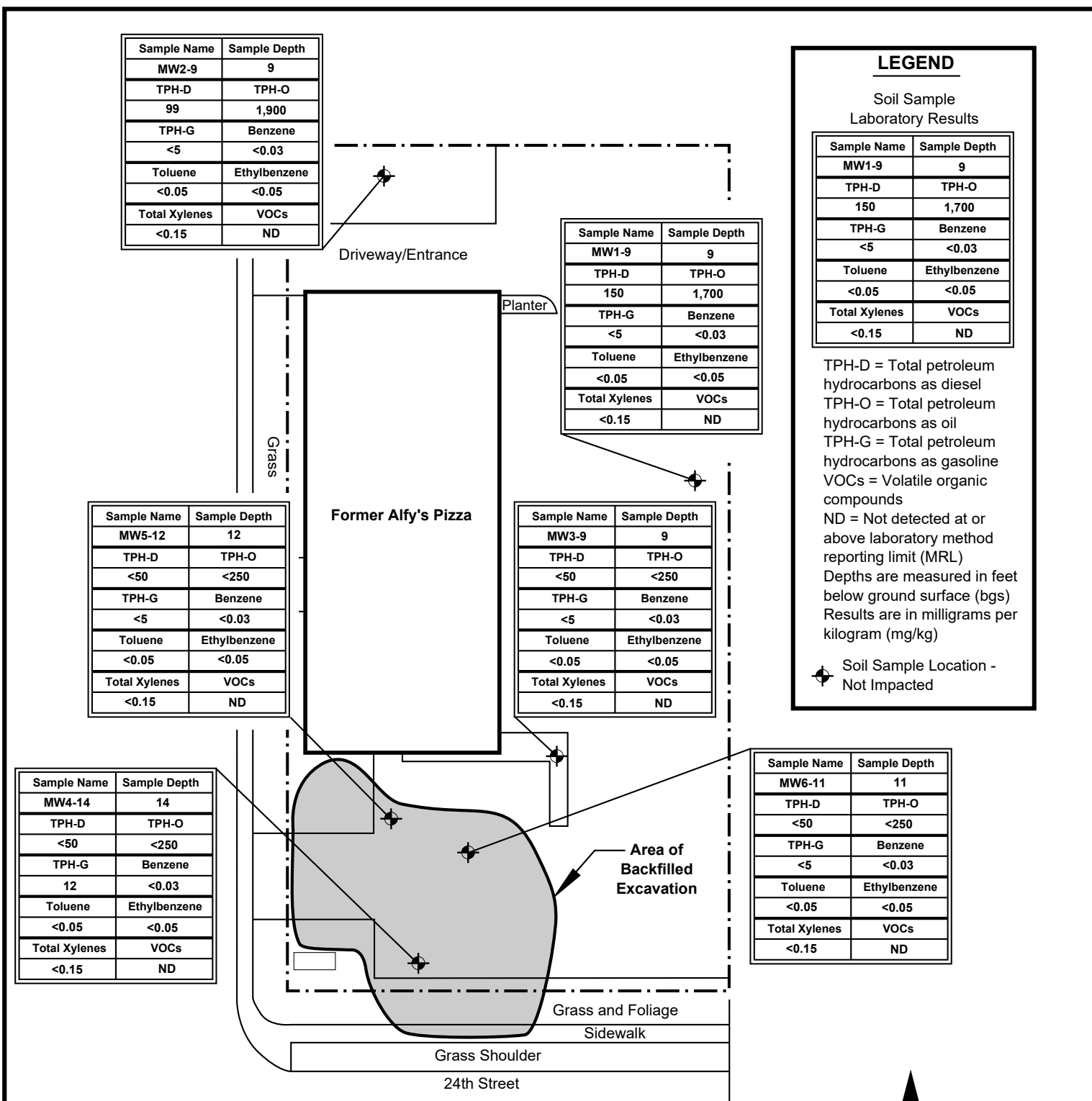
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**FIGURE 3**  
EXCAVATION SOIL  
SAMPLE LOCATIONS



**FIGURE 5**  
 Reference: "Excavation and Well Installation Report," Puget Environmental PLLC, April 8, 2022.

Dimensions and locations are approximate.

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**FIGURE 5**  
 MONITORING WELL  
 LOCATIONS AND SOIL SAMPLE  
 LABORATORY RESULTS



