

**From:** [Song, Jing \(ECY\)](#)  
**To:** [Daniel Landry](#)  
**Cc:** "[Maidment, Angela](#)"; [David Seaver](#); [Warfel, Michael \(ECY\)](#)  
**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206  
**Date:** Tuesday, August 23, 2022 10:02:41 AM  
**Attachments:** [image003.png](#)  
[image010.png](#)  
[image012.png](#)  
[image014.png](#)  
[image016.png](#)

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Dan,

Thank you for your summary.

Ecology has carefully reviewed the groundwater sampling data again. Based on the data review, Ecology has not changed our opinion on the August 8, 2022 meeting.

Ecology is respectfully requesting one more round of groundwater sample to be collected from both monitoring well MW-6 and MW-9. Based on the trend, Ecology is optimistic that the new data point will confirm the downward trend of NWTPH-Dx concentration in both wells, and move the site toward a NFA. However, Ecology will still need to review the additional groundwater data before making any determination.

Ecology appreciate your work to date to clean up the Site. Ecology believes that the Site cleanup is on a right path and is close to the final closure. Please let me know if you need more technical assistance or discussion.

### **Jing Song, LG, LHG**

Voluntary Cleanup Program Site Manager | Toxics Cleanup Program | WA Department of Ecology, Northwest Region  
15700 Dayton Ave N, Shoreline, WA 98133  
**Cell:** (425) 229-2565 | **Email:** [jing.song@ecy.wa.gov](mailto:jing.song@ecy.wa.gov)

---

**From:** Daniel Landry <dlandry@aandmengineering.com>  
**Sent:** Monday, August 22, 2022 2:22 PM  
**To:** Song, Jing (ECY) <JISO461@ECY.WA.GOV>  
**Cc:** 'Maidment, Angela' <Angela.Maidment@estes-express.com>; David Seaver <dseaver@aandmengineering.com>; Warfel, Michael (ECY) <MWAR461@ECY.WA.GOV>  
**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

Jing and Mike,

Thank you for your time on August 8, 2022 to discuss the path to closure for the former Provisioner's Express facility located in Auburn, Washington (VCP No. 3206). As we discussed during the meeting, A&M and Estes believe the agreement for the path to closure established in January/February 2020 has been altered by

Ecology. This represents the second occasion where this has occurred since July 2018.

I think it would be beneficial to present a chronology of events related to closure since July of 2018. The referenced emails are attached. The events were as follows:

### **Recent Chronology (December 2019 – July 2022)**

May and June, 2018 – Asphalt sealant was discovered in MW-8 during a monitoring event. The product was removed, the well purged and cleaned, and Ecology informed of the incident.

July 10, 2018 email Jing Song – Ecology indicated preliminary approval had been received from the section manager for an NFA with an Environmental Covenant (EC) for the Site based on a Focused Feasibility Study prepared for the site.

September 2018 – At the request of Ecology, ETG submitted a work plan to install a new well (MW-10) downgradient of MW-8 to monitor groundwater quality.

September 2018 – At the request of Ecology, ETG submitted a work plan to install a new well (MW-10) downgradient of MW-8 to monitor groundwater quality.

December 20, 2020 – Ecology issues Further Acton Opinion Letter for the Site.

August 2018 thru May 2019 – Following cleaning, four consecutive quarters of monitoring for well MW-8 indicate MTCA Method A compliance.

September 13, 2019 email Jing Song – Ecology requests additional remedial action to address diesel range organics (DRO) in MW-9.

November 2019 – Monitoring data for MW-10 represents the fourth consecutive quarter of MTCA Method A compliance. ETG proposes suspending groundwater monitoring while the EC and NFA proposed in July 2018 are prepared.

December 16, 2019 email Jing Song – Ecology responded to ETG's Fourth Quarter Monitoring 2019 report proposing NFA and EC. Ecology disagrees with the proposed closure and requests remedial action for MW-9 and requests closure meet the criteria presented in the December 2018 opinion letter.

January 7, 2020 Conference Call with Ecology – Estes and ETG complete a conference call with Jing Song and Louise Bardy of Ecology. During the call ETG and Estes question what had changed since July 2018 and proposed a Model Remedy 3 if soil in the 1999 source area were compliant with MTCA Method A. Ecology indicated the release to MW-8 and the trend in MW-9 warranted the change in closure requirements and indicate MW-9 is a point of compliance and needs to meet MTCA Method A. Monitored Natural Attenuation is not sufficient for closure. Ecology also indicated MW-8 was compliant. Louise Bardy indicated Ecology did not want an EC for the site and the key issue was whether DRO in MW-9 was under control, and that the other wells had met compliance criteria. Estes indicated the goal for site closure appears to have changed. ETG indicated both MW-1 and MW-9 indicated bio decay and downward trends over time. Ecology agreed to look at a Model Remedy 3 for the site.

January 28, 2020 email Dan Landry, ETG – ETG submits an email to Ecology summarizing the January 7, 2020 call. ETG proposes pursuing a Model Remedy 1 or 2 after MW-9 groundwater was compliant with MTCA Method A. Compliance soil sampling in the source area would determine whether an institutional control was required for soil (Model Remedy 2). Consistent with Ecology's statement during the meeting that all other wells had met compliance, it was proposed to implement semi-annual groundwater monitoring until MW-9 was first compliant, which would then be followed by three additional consecutive quarters of sampling to confirm compliance.

January 31, 2020 email Jing Song – Ecology concurred with the proposed groundwater monitoring and also proposed considering an alternative approach for closure.

February 20, 2020 email Dan Landry, ETG – After further evaluation of the proposed alternative approach, Ecology was informed that Estes would be following the approach proposed in ETG's January 28, 2020 email and again presented the plan to only sample MW-9 semi-annually until compliant, and then quarterly for three consecutive quarters.

February 28, 2020 email Jing Song – Ecology stated they have no comments on the proposed first quarter 2020 groundwater monitoring plan that was proposed in ETG's January 28, 2020 and February 20, 2020 emails.

September 7, 2021 email Dan Landry, A&M – A&M indicated the August 2021 data was compliant and three more consecutive compliance quarters would be completed.

September 16, 2021, 1:14 PM email Jing Song – Ecology stated they approved beginning quarterly sampling

but referenced the compliance sampling proposed in the December 2018 opinion letter.

September 16, 2021, 2:29 PM email Dan Landry, A&M – A&M submitted the emails that clarified the closure path after the January 7, 2020 call with Ecology, and the groundwater monitoring proposed in ETG's January 28, 2020 and February 20, 2020 emails, and the agreement by Ecology.

September 16, 2021 2:32 PM email Jing Song – Ecology agreed with the sampling proposed.

December 9, 2021 email Dan Landry, A&M – A&M indicated the November 2021 data was compliant and two more compliance quarters would be completed.

December 9, 2021 PM email Jing Song – Ecology acknowledged receipt of the information.

April 7, 2022 email Dan Landry, A&M – A&M indicated the March 2022 data was compliant and one more compliance quarter would be completed.

April 7, 2022 PM email Jing Song – Ecology acknowledged receipt of the information.

June 18, 2022 email Dan Landry, A&M – A&M indicated the June 2022 data was compliant and represented the fourth compliant compliance event for MW-9, and that no additional groundwater monitoring was proposed. A&M also proposed completing a work plan for the sampling of source soils to confirm compliance.

July 18, 2022, 1:14 PM email Jing Song – Ecology stated compliance monitoring for MW-9 needed to continue consistent with the compliance sampling proposed in the December 2018 opinion letter.

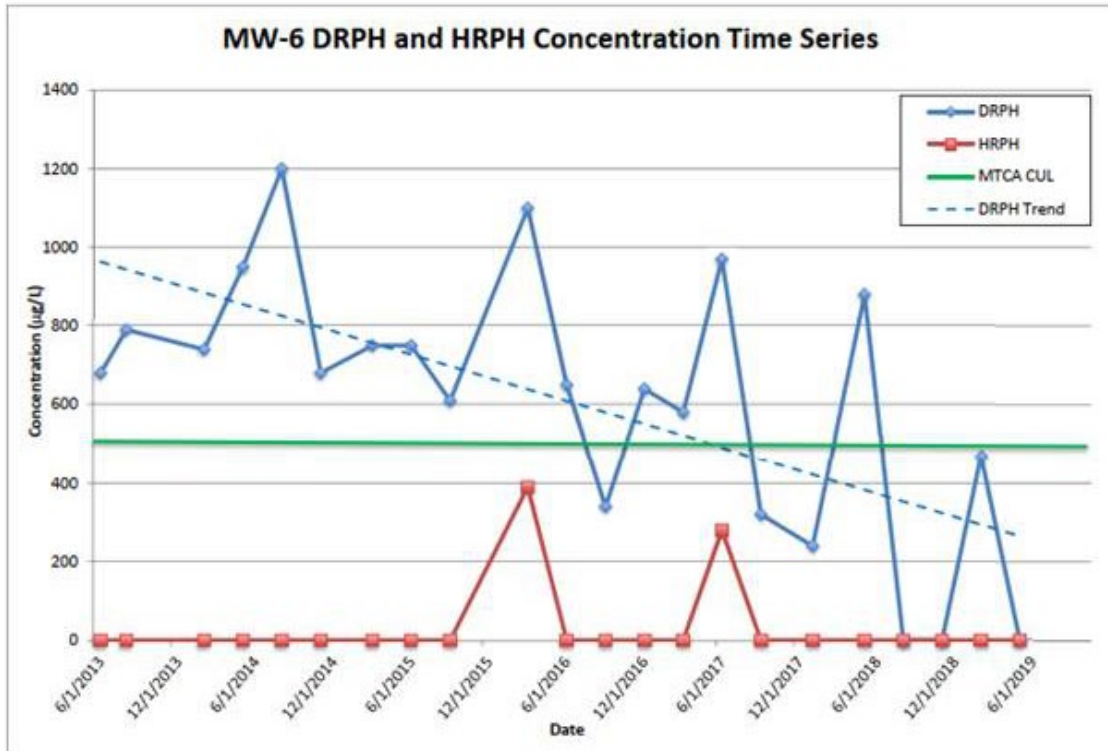
During the August 8, 2022 conference call, Ecology stated one more quarter from MW-6 and MW-9 should be sufficient to confirm a decreasing trend for water quality in MW-6 and MW-9. However, Ecology was unwilling to commit that concentrations compliant with MTCA Method A CULs from that event would be acceptable for closing groundwater compliance sampling. Estes agreed to consider the request and respond to Ecology.

### **Proposed Actions**

In the interest of resolving the groundwater compliance issue for monitoring well MW-9, the well will be sampled for one additional quarter in third quarter 2022.

However, sampling of monitoring well MW-6 for the first time in 39 months is not reasonable.

- According to historical reporting, MW-6 was installed in 2013 to monitor groundwater related to the accidental release of UST decommissioning rinsate during the decommissioning of a diesel UST in 2012. The nine (9) UST decommissioning compliance soil samples were compliant with MTCA Method A CULs with only one reported DRO detection at 230 milligram per kilogram (mg/kg), well below the CUL of 2,000 mg/kg.
- The monitoring data for MW-6 indicates a consistent downward trend from June 2013 through June 2019 with the final four quarterly sampling events below MTCA Method A CULs. Coupled with the observed ongoing natural degradation of petroleum hydrocarbons in the subsurface there is no reason to expect a rebound of DRO concentrations in MW-6.



- In January 2020 Ecology acknowledged that all wells other than MW-9 were compliant and that the DRO contamination in MW-9 was the only remaining issue for closure.

We look forward to receiving your technical response.

Thank you,

**Daniel Landry**  
**Senior Project Manager**  
**A & M Engineering and Environmental Services, Inc.**

1176 West 7<sup>th</sup> Avenue | Eugene, Oregon 97402  
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**From:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>  
**Sent:** Tuesday, August 9, 2022 11:25 AM  
**To:** Daniel Landry <[dlandry@aandmengineering.com](mailto:dlandry@aandmengineering.com)>  
**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver

<[dseaver@aandmengineering.com](mailto:dseaver@aandmengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>

**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

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Tomorrow at 11 works.

---

**From:** Daniel Landry <[dlandry@aandmengineering.com](mailto:dlandry@aandmengineering.com)>

**Sent:** Tuesday, August 9, 2022 11:18 AM

**To:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>

**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandmengineering.com](mailto:dseaver@aandmengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>

**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

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Angela is not available on Friday. She is available tomorrow before 1:00 PM PDT and Thursday before 12:30 PM PDT.

If those are unavailable, which is your next available date and times?

Thank you,

**Daniel Landry**

**Senior Project Manager**

**A & M Engineering and Environmental Services, Inc.**

1176 West 7<sup>th</sup> Avenue | Eugene, Oregon 97402

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---

**From:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>

**Sent:** Tuesday, August 9, 2022 10:44 AM

**To:** Daniel Landry <[dlandry@aandmengineering.com](mailto:dlandry@aandmengineering.com)>  
**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandmengineering.com](mailto:dseaver@aandmengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>  
**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

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Hi Dan – Yes we are available this Friday.

---

**From:** Daniel Landry <[dlandry@aandmengineering.com](mailto:dlandry@aandmengineering.com)>  
**Sent:** Tuesday, August 9, 2022 9:58 AM  
**To:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>  
**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandmengineering.com](mailto:dseaver@aandmengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>  
**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

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Jing,

Page 160 of Ecology's *Guidance for Remediation of Petroleum Contaminated Sites*, also states:

The eight (8) samples may be reduced to four (4) samples collected after remediation from each compliance monitoring point, and collected in consecutive quarters, over a period of one (1) year if the following conditions are met:

- The groundwater concentrations are stable or decreasing over the one (1) year time period being evaluated;
- The initial four (4) sample results are not highly variable (i.e. the highest concentration above the PQL is no more than three (3) times the lowest concentration above the PQL);
- The site is a lower risk site; and <sup>37</sup>
- Other site-specific conditions as determined by Ecology.

This site meets those conditions on every specific item.

- (1) The concentrations are clearly “stable or decreasing” over time during the four quarters of monitoring.
- (2) The sample data is not highly variable. The sampling results indicate only a 2-times variation in concentration above the PQL.
- (3) The site is a commercial transportation property within a commercial/industrial area that will continue in its current use for the foreseeable future. It is a very low risk site.

A&M has been very clear in all reports since August of 2021 that we considered four (4) quarters appropriate for compliance and consistent with the January 2020 agreement with Ecology.

I think a phone call with all parties involved would be beneficial at this time.

**Daniel Landry**

**Senior Project Manager**

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---

**From:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>

**Sent:** Monday, August 8, 2022 4:47 PM

**To:** Daniel Landry <[dlandry@aandmengineering.com](mailto:dlandry@aandmengineering.com)>

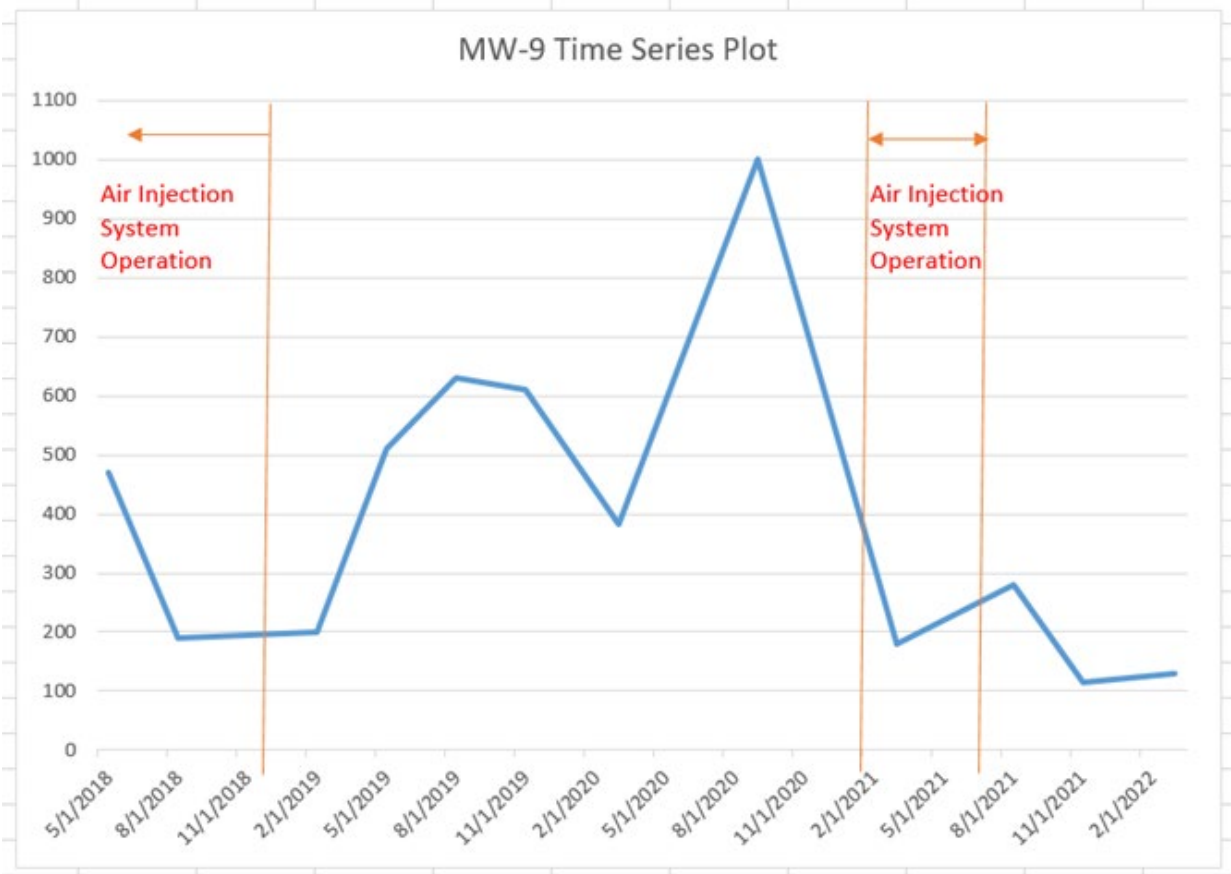
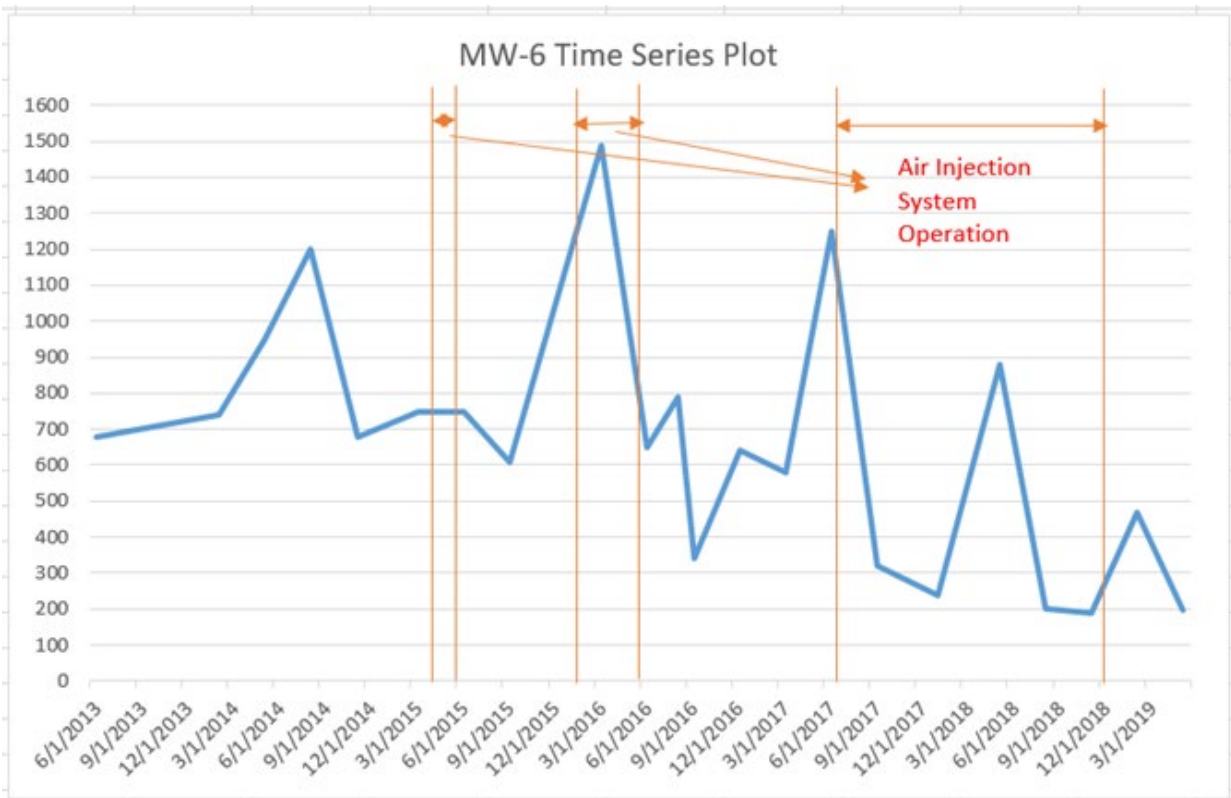
**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandmengineering.com](mailto:dseaver@aandmengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>

**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

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Hi Dan,

Please see the Time Series Plots for wells MW-6 and MW-9.



It is Ecology's opinion that the currently available data points are not sufficient to determine if



rebound occurs after the air injection system shutdown. Per Ecology's *Guidance for Remediation of Petroleum Contaminated Sites*, Page 160:

- **After remediation**, at least eight (8) samples are collected from each compliance monitoring point, collected in consecutive quarters, over a period of at least two (2) years. The sampling dates should include high and low water table conditions;
- The groundwater concentrations are stable or decreasing over the two (2) year time period being evaluated.<sup>36</sup>

In Ecology's December 20, 2018 *Opinion Letter*, Ecology also states the monitoring requirements for demonstrating compliance:

Monitoring well Number	Quarters needed to demonstrate compliance	Analysis required
MW-3	8, may reduce to 4 <sup>1</sup>	TPHd, TPHo <sup>2</sup>
MW-6	8, may reduce to 4 <sup>1</sup>	TPHd, TPHo <sup>2</sup>
MW-8	8	TPHd, TPHo
MW-9	8	TPHd, TPHo, TPHg <sup>3</sup> , BTEX <sup>3</sup>
New Monitoring Well	8, may reduce to 4 <sup>1</sup>	TPHd, TPHo, TPHg <sup>3</sup> , total lead <sup>3</sup> , naphthalenes <sup>3</sup> , cPAH <sup>3</sup> , PCB <sup>3</sup> , VOC <sup>3</sup>
<sup>1</sup> = May reduce to four quarters if the concentrations show a stable or decreasing trend, and the concentrations in the initial four quarters are not highly variable.		
<sup>2</sup> = TPHg and BTEX analysis is not needed because historic data showed at least eight quarters of TPHg and BTEX concentrations below the cleanup levels.		
<sup>3</sup> = Continued analysis may not be needed if no concentration is above PQL.		

Based on the current data, Ecology recommends the following:

Please let me know if you need to discuss more.

- Collect at least two more quarters of groundwater data from well MW-9 to determine the trend after the system shutdown. Ecology will review the data and determine if more quarters are needed.
- Collect at least one quarter of groundwater data from well MW-6 to determine the current groundwater condition after the system shutdown. Ecology will review the data and determine if more data is needed.
- At the same time, Ecology encourages submission of a work plan for soil sampling in the source area. It will also be another line of evidence for compliance.

**Jing Song, LG, LHG**

Voluntary Cleanup Program Site Manager | Toxics Cleanup Program | WA Department of Ecology, Northwest Region

15700 Dayton Ave N, Shoreline, WA 98133

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---

**From:** Daniel Landry <[dlandry@aandengineering.com](mailto:dlandry@aandengineering.com)>  
**Sent:** Monday, August 8, 2022 12:54 PM  
**To:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>  
**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandengineering.com](mailto:dseaver@aandengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>  
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Jing,

Attached is the original email that was sent by Ecology in reply to our email on January 28, 2020 after our call with you and Louise Bardy regarding a path forward for the site. As indicated on the second to last paragraph in the email we proposed semi-annual monitoring until MW-9 met MTCA Method A, at which point we would follow with three consecutive quarters of compliance sampling, and if compliant we would pursue Model Remedy 1 closure. Ecology's response concurred with our plan for continuous monitoring.

I hope this clarifies Ecology's agreement with a four quarters approach.

Thank you,

**Daniel Landry**  
**Senior Project Manager**  
**A & M Engineering and Environmental Services, Inc.**

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**From:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>  
**Sent:** Monday, August 8, 2022 11:19 AM  
**To:** Daniel Landry <[dlandry@aandengineering.com](mailto:dlandry@aandengineering.com)>  
**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandengineering.com](mailto:dseaver@aandengineering.com)>; Warfel, Michael (ECY) <[MWAR461@ECY.WA.GOV](mailto:MWAR461@ECY.WA.GOV)>  
**Subject:** RE: Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No.

NW3206

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Hi Dan –

Sorry to the delayed response. I just recovered from COVID.

In the August 2021 email, Ecology concurs with moving forward with quarterly monitoring. However, Ecology does not change to four quarters of groundwater monitoring. Typically Ecology requires eight quarters of groundwater data to demonstrate compliance after a treatment system shutdown.

Please let me know if you want to discuss more.

### **Jing Song, LG, LHG**

Voluntary Cleanup Program Site Manager | Toxics Cleanup Program | WA Department of Ecology, Northwest Region

15700 Dayton Ave N, Shoreline, WA 98133

**Cell:** (425) 229-2565 | **Email:** [jing.song@ecy.wa.gov](mailto:jing.song@ecy.wa.gov)

---

**From:** Daniel Landry <[dlandry@aandmengineering.com](mailto:dlandry@aandmengineering.com)>

**Sent:** Monday, July 18, 2022 11:33 AM

**To:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>

**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandmengineering.com](mailto:dseaver@aandmengineering.com)>

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Jing,

As indicated in the prior August 2021 emails from ETG and your acknowledging email the agreed closure path with Ecology only included 4 quarters of compliance sampling.

Thank you,

**Daniel Landry**

**Senior Project Manager**

**A & M Engineering and Environmental Services, Inc.**

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**From:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>

**Sent:** Monday, July 18, 2022 11:22 AM

**To:** Daniel Landry <[dlandry@aandengineering.com](mailto:dlandry@aandengineering.com)>

**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandengineering.com](mailto:dseaver@aandengineering.com)>

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Hi Dan –

Thank you submitting the Groundwater Monitoring Report for June 2022.

It is great that groundwater data collected from MW-9 were below the MTCA Method A cleanup level for four consecutive quarters. Based on Ecology's *Further Action letter*, dated December 20, 2018, Page 5, monitoring well MW-9 need 8 quarters of groundwater data below the Method A cleanup levels to demonstrate compliance and confirm the effectiveness of the cleanup action. Please keep conducting quarterly groundwater monitoring on monitoring well MW-9.

At the same time, Ecology is happy to review a work plan for soil sampling in the source area to confirm the soil condition.

Please let me know if you need more discussion.

Jing

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**From:** Daniel Landry <[dlandry@aandengineering.com](mailto:dlandry@aandengineering.com)>

**Sent:** Monday, July 18, 2022 8:33 AM

**To:** Song, Jing (ECY) <[JISO461@ECY.WA.GOV](mailto:JISO461@ECY.WA.GOV)>

**Cc:** 'Maidment, Angela' <[Angela.Maidment@estes-express.com](mailto:Angela.Maidment@estes-express.com)>; David Seaver <[dseaver@aandengineering.com](mailto:dseaver@aandengineering.com)>

**Subject:** Former Provisioners Express, Quarterly Groundwater Report - June 2022, Auburn, WA. VCP No. NW3206

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Jing,

Attached is the Groundwater Monitoring Report for the June 2022 monitoring event at the Former Provisioners Express site in Auburn, Washington. Petroleum hydrocarbons were not reported above MTCA Method A CULs in the primary and duplicate groundwater samples collected from MW-9. This represents the fourth consecutive compliant groundwater monitoring event. Based on the analytical results, no additional groundwater compliance monitoring is required at this time.

A&M proposes the completion of soil sampling to determine current contaminant concentrations in the area where soil failed MTCA Method A for diesel and oil range petroleum hydrocarbons in 1998. A&M on behalf of Estes West, requests Ecology's concurrence to proceed with development of a work plan to confirm current soil contamination in the source area. If soil concentrations are compliant with MTCA Method A, site closure with unrestricted land use will be requested.

Please call or reply with any questions.

Thank you,

**Daniel Landry**

**Senior Project Manager**

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