



Electronic Copy

STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Northwest Region Office  
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

June 13, 2023

Dean Kruse  
Toula Properties  
3801 92<sup>nd</sup> Ave NE  
Yarrow Point, WA 98004  
([dakruse20@gmail.com](mailto:dakruse20@gmail.com))

**Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following  
Hazardous Waste Site:**

- **Site Name:** Firestone 31A3
- **Site Address:** 351 Rainier Avenue South, Renton, WA 98057
- **Facility/Site No.:** 62398766
- **Cleanup Site ID No.:** 16657
- **VCP Project No.:** NW3354

Dear Dean Kruse:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup the Firestone 31A3 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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Does the proposed Work Plan *Interim Remedial Action & Cleanup Action Plan, Former Firestone Complete Auto Care Property, 351 Rainier Avenue South, Renton, Washington*, dated August 4, 2022 (*August 2022 CAP*) meet the stated objectives with respect to Site data gaps?

**YES. Ecology has determined that the proposed confirmational monitoring is sufficient to evaluate the effectiveness of the interim actions and guide further remedial actions, if necessary. Limited additional characterization, discussed below, is recommended to fully define contamination at the Site.**

## 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- (TPH-G), diesel- (TPH-D), and oil-range (TPH-O) petroleum hydrocarbons, tetrachloroethylene (PCE), and arsenic into the Soil.
- TPH-D into the Groundwater.
- PCE and naphthalene to Air.

**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. The Riley Group, Inc., *Interim Remedial Action & Cleanup Action Plan, Former Firestone Complete Auto Care, 351 Rainier Avenue South, Renton, Washington*, August 4, 2022.
2. Ecology, *Initial Investigation Field Report, Firestone 31A3, 351 Rainier Ave, Renton, WA 98057*, June 27, 2022.
3. Environmental Associates, Inc., *Characterization of on-Site Contamination, Vacant Former Firestone Auto Care Property, 351 Rainier Avenue South, Renton, Washington 98057*, April 12, 2021.
4. Environmental Associates, Inc., *Limited Subsurface Sampling and Testing, Vacant Former Firestone Auto Care Property, 351 Rainier Avenue South, Renton, Washington 98057*, February 18, 2021.

A number of these documents are accessible in electronic form from the [Site web page](https://apps.ecology.wa.gov/cleanupsearch/site/16657).<sup>1</sup> The complete records are kept in the Central Files of the Northwest Regional Office of Ecology

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/16657>

(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 this 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 and Opinion

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Based on a review of the *August 2022 CAP*, Ecology has determined:

### Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards for the Site and select a cleanup for the Site. The Site is described above and in **Enclosure A**.

- **Soil characterization.**

Soil at the Site was contaminated with TPH-G, TPH-D, PCE, and arsenic, sourced from historic operations of a former automobile service station located at 351 Rainier Avenue S in Renton, Washington (the Property). Contaminated soil was discovered in 2021 during due diligence investigations at the site. The source for contamination at the Site appears to be two in-ground hydraulic hoists, located in the proximity of explorations B6 and B7 (See **Enclosure A, Figure 2**).

Two waste oil storage tanks were also reportedly located on the Site. An aboveground storage tank (AST) was located on the western portion of the Property at the time of the initial investigation in the vicinity of B2 (see **Enclosure A, Figure 2**). The Property is also listed in Ecology's Underground Storage Tank (UST) database, which indicates that one waste oil UST may have been present on the Property at some point during its operation. Notes in Ecology's UST database for the Site indicate that the UST was removed from the Property. A geophysical survey was conducted on the Property to locate the waste oil UST in January 2021. The geophysical survey did not indicate the presence of a UST on the Property.

A total of 20 borings were installed at the Site between February and March 2021 to a maximum depth of 30 feet below ground surface (bgs). With the exception of B6, B6A,

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<sup>2</sup> <https://ecology.wa.gov/publicrecords>

and B7, contaminants were not detected above the MTCA cleanup levels in borings advanced at the Site.

Soil samples collected from B6 contained PCE above the Method A cleanup level at 4 and 15 feet bgs. Boring B6A was advanced in the immediate vicinity of B6 to confirm the release of PCE to soil. PCE was below the Method A cleanup level and laboratory reporting limit in soil samples collected from 15 to 30 feet bgs in B6A, indicating that the PCE contamination in this area does not appear to extend beyond 15 feet bgs. In addition, a soil sample collected from 10 feet bgs in B6A contained TPH-G and arsenic above the Method A cleanup levels. A soil sample collected from 9 feet bgs in B7 contained TPH-D above the Method A cleanup level.

- **Groundwater characterization**

Groundwater samples were collected from temporary wells installed in borings B1 to B20 from February to March 2021. With the exception of B6 and B7, contamination was not detected above MTCA cleanup levels in groundwater samples collected at the Site. Groundwater samples collected from B6 and B7 contained TPH-D at concentrations of 2,400 and 16,000 micrograms per liter ( $\mu\text{g/L}$ ), respectively. These concentrations are above the MTCA Method A cleanup level. Groundwater samples collected from B2 and B7 were analyzed for the recommended waste oil analytes in MTCA [Table 830-1](#)<sup>3</sup>. With the exception of TPH-D in B7, none of these analytes were detected above the laboratory reporting limit.

Ecology concurs with the proposed monitoring well network discussed in the *August 2022 CAP* (see **Enclosure A, Figure 5**). This monitoring well network is well situated to characterize any remaining impacts to groundwater. Further characterization of contamination is necessary to demonstrate that the interim action, discussed below, is protective of groundwater. Due to the presence of TPH-G, PCE, and arsenic in soil and PCE and naphthalene in soil vapor at the Site, Ecology recommends analyzing groundwater samples for these compounds in addition to TPH-D and TPH-O for a minimum of four quarters to evaluate whether they are present in groundwater at the Site. Depending on the groundwater monitoring results, additional groundwater monitoring may be needed.

- **Vapor Intrusion Assessment.**

Three soil vapor samples were collected from borings B5, B9, and B10 during Site

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<sup>3</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-900&pdf=true>

investigation in February 2021. All three samples contained naphthalene above the Method B screening level for unrestricted use. The soil gas sample collected from B5 also contained PCE above the Method B screening level for unrestricted use. As discussed above, Ecology recommends analyzing groundwater samples for these compounds to determine the risk of vapor intrusion at adjacent properties following the completion of the interim action.

### **Cleanup levels.**

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

- **Soil.**

MTCA Method A soil cleanup levels for unrestricted use (WAC 173-340-740(2); Table 740-1) with the standard point of compliance throughout the Site are appropriate (WAC 173-340-740(6)(b)).

Ecology appreciates your evaluation of the need for a Terrestrial Ecological Evaluation (TEE) for the Site. Based on its location 500 feet away from 1.5 acres of contiguous undeveloped land, the Site qualifies for an exemption from the TEE process. Therefore, the standard Method A soil cleanup levels and point of compliance as discussed above are appropriate at the Site. Please note that a [TEE Form](#)<sup>4</sup> is required to record the decision-making process for the TEE.

- **Groundwater.**

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 cleanup levels, which are protective of groundwater as a potable source, are appropriate for the Site (WAC 173-340-720(3); Table 720-1). The standard point of compliance for groundwater is defined as throughout the site, from the uppermost level of the saturated zone to the lowest depth which could potentially be affected (WAC 173-340-720(8)(b)).

### **Cleanup.**

Ecology has determined that Site data collected to date is not sufficient to confirm the cleanup action you performed meets the cleanup standards at the Site. The cleanup actions performed to date are therefore considered interim actions. Ecology's recommendations regarding additional Site groundwater characterization are discussed above.

The following interim remedial actions were completed at the Site:

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<sup>4</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/ECY090300.html>

- Demolition of existing structures on the Property including the building slab.
- Excavation of soils contaminated with TPH-G, TPH-D, PCE, and arsenic in two small areas in the vicinity of the former hydraulic hoists in the central portion of the Property (EX1 and EX2, see **Enclosure A Figure 3 and Figure 4**). A total of approximately 82 tons of known and potentially contaminated soil was transported off Site for disposal at a permitted facility. Performance monitoring soil samples collected from the final extents of EX1 and EX2 did not contain TPH-G, TPH-D, TPH-O, PCE, or arsenic above their respective Method A cleanup levels.

Soil excavated from EX1 was stockpiled on the Property and sampled for re-use. Stockpile samples did not contain Site contaminants above their respective cleanup levels. Stockpiled soil and imported clean fill material was used to backfill both excavations to grade.

- Application of approximately 200 pounds of the remedial product Petrofix to each of the excavations to aid in attenuation of TPH-D in soil and groundwater, prior to backfilling.

#### **Next steps.**

Ecology appreciates your efforts characterizing and cleaning up the Site to date. Additional characterization and confirmation sampling is needed to demonstrate the efficacy of the interim actions conducted at the Site. Ecology concurs with the proposed location of groundwater monitoring wells at the Site and the planned initial sampling schedule. As discussed above, Ecology recommends that groundwater samples collected from proposed Site monitoring wells should be analyzed for all Site contaminants.

The practice of geology is regulated under RCW 18.220, and persons engaged in this profession are required to be licensed. Licensed persons are required to obtain a seal and stamp professional reports prepared for others (Chapter 308-15 WAC Sections 070&075). The *April 2022 CAP*, prepared and submitted by The Riley Group contains geological/hydrological descriptions and interpretations, but was not stamped. The final cleanup report for the Site must reference applicable previous reports prepared by The Riley Group and be approved and stamped by a licensed geologist/hydrogeologist.

#### **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.

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(6).

**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 web site: [www.ecy.wa.gov/vcp](http://www.ecy.wa.gov/vcp). If you have any questions about this opinion, please contact me by phone at 206-459-6287 or by email at [david.unruh@ecy.wa.gov](mailto:david.unruh@ecy.wa.gov).

Sincerely,



David Unruh  
VCP Site Manager  
Toxics Cleanup Program, NWRO

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

cc: Eric Zuern, The Riley Group, Inc., ([ezuern@riley-group.com](mailto:ezuern@riley-group.com))  
Sonia Fernandez, Ecology ([sonia.fernandez@ecy.wa.gov](mailto:sonia.fernandez@ecy.wa.gov))

## **Enclosure A**

### **Description and Diagrams of the Site**



# Site Description

*This section provides Ecology's understanding and interpretation of Site conditions and is the basis for the opinions expressed in the body of the letter.*

**Site:** The Site is defined by releases of the following at 351 Rainier Avenue South in Renton, King County, Washington:

- TPH-G, TPH-D, TPH-O, PCE, and arsenic to Soil.
- TPH-D to Groundwater.
- PCE and naphthalene to Air.

The Site is located on the west side of Rainier Ave South, just south of Southwest Sunset Boulevard, and consists of one 0.36-acre King County tax Parcel (Parcel no. 000720-0126; the Property; **Figure 1, Figure 2**).

**Area and Property Description:** The Property is in a commercial area in Renton and is currently undergoing redevelopment into a commercial parking lot for the south-adjacent commercial business. The Property is bounded by the following:

- North: A commercial building occupied by an auto supply store with Southwest Sunset Boulevard beyond.
- East: Rainier Ave South with a service station and fast-food restaurant beyond. The service station sits on the [UNOCAL 5308 Renton BP Site<sup>5</sup>](https://apps.ecology.wa.gov/cleanupsearch/site/8124) (300 Rainier Avenue S, Renton, WA; Facility Site ID 16258354; CS ID 8124). Ecology issued a no further action determination for this site in October 2012 after an Independent Remedial Action Review found that remedial actions conducted in 1990 through 1992 met MTCA requirements.
- South: A fast food restaurant with Renton Center Way beyond.
- West: A building occupied by multiple other retail businesses including a dry cleaner.

**Property History and Current Use:** The Property was developed in 1960 with an auto maintenance shop building which was demolished in April of 2022. Prior to 1960, the Property appears to have been vegetated and used as pastureland. The Property is currently vacant and is planned for redevelopment into a parking lot.

**Sources of Contamination:** Contamination was discovered at the Site in 2021 in borings B-6 and B-7 (**Figure 2**). Soil samples collected from these borings contained TPH-G, TPH-D, PCE, and arsenic above the Method A cleanup levels. Releases appear to be sourced from historic vehicle servicing operations, most notably related to the auto hoists that were in the central

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<sup>5</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/8124>

area of the building. During Site investigations in 2021, remnants of in-ground hydraulic hoists including hydraulic fluid lines were observed.

One above ground storage tank (AST) storing waste oil was located within a secondary containment area on the northwest exterior of the Property until 2020. In addition, historical records indicate that an underground storage tank (UST) used for storage of waste oil was present on the Property and was removed at some point (**Figure 2**). No records documenting the removal of the UST are available, and evidence of the former UST was not discovered during a ground-penetrating radar survey conducted in 2021.

**Physiographic Setting:** In general, the Seattle area sits on a complex and incomplete succession of glacial and nonglacial deposits that overlie an irregular bedrock surface. The City straddles the Seattle uplift, the Seattle fault zone, and the Seattle basin, three major bedrock structures that reflect north-south crustal shortening in the Puget Sound Lowland. The landforms and near-surface deposits that cover much of the Seattle area include upland glacial till that in many areas has been cut by recessional melt-water into channels. The glacial till can display north-south axes oriented in the ice-flow direction. Glacially-overridden deposits underlie the drumlins and most of the uplands, whereas loosely consolidated postglacial deposits fill deep valleys and recessional melt-water channels. Soft organic-rich deposits have filled former lakes, bogs and sloughs.

The site is located in the former Black River valley, a floodplain which is approximately one mile wide in this area. The Site is situated on relatively flat ground at an elevation of approximately 30 feet above mean sea level (amsl).

**Surface/Storm Water System:** The Property is currently unpaved and covered with soil and vegetation. Where it does not infiltrate, stormwater at the Site drains via sheet flow to catch basins in Rainier Avenue S operated by the City of Renton. The closest surface water to the Site is the Cedar River, located approximately 0.6 miles northeast.

**Ecological Setting:** The Site is zoned for commercial use. Adjoining properties to the north, south, east and west are also zoned for commercial use. Land surface on Property is currently unpaved. Land surfaces on adjacent parcels are primarily covered by buildings, asphalt, and concrete pavement with some small, landscaped areas.

**Geology:** The [geologic map of the area](#) indicates that the Site is underlain by artificial fill and quaternary alluvial deposits. Boring logs for explorations completed at the Site indicate that the Property is underlain by silts, sands, and gravels to the maximum explored depth of 30 feet below ground surface (bgs).

**Ground Water:** No permanent monitoring wells are currently located at the Site. Depth to groundwater has been observed at 9 to 11 feet bgs in borings and excavations at the Site in 2021 to 2022 (**Figure 3**).

**Water Supply:** Drinking water is supplied to the Property by municipal wells operated by the City of Renton, the nearest of which is located approximately 0.8 miles east of the Property.

The Property is in the 5-year wellhead protection zone for City of Renton municipal supply wells EW-3R, PW-8, PW-9, RW-1, RW-2, and RW-3. Data provided in the most recent Water System Plan completed by the City of Renton did not indicate that any Site contaminants of concern (COCs) had been detected in water from supply wells post-treatment.

**Release and Extent of Contamination:** In 2021, a total of 21 soil borings were installed at the Site (B-1 to B-20; **Figure 2, Figure 3**). Soil and groundwater containing Site COCs above the Method A cleanup levels appear to be present in the vicinity of former in-ground hoist mechanisms (**Figure 2, Figure 3, Figure 4, Figure 5**). The following borings contained soil and groundwater with concentrations of Site COCs above the applicable Method A cleanup levels:

B6/B6A:

- Soil
  - B6A at 10 feet bgs: Arsenic at 32.4 milligrams per kilogram (mg/kg) and TPH-G at 160 mg/kg
  - B6 at 4 feet bgs: PCE at 0.06 mg/kg
  - Following detection of PCE above the cleanup level at B6 at 4 and 15 feet bgs, B6A was advanced in the immediate vicinity to confirm the exceedances. Samples collected from B6A at 15, 20, and 30 feet bgs did not contain PCE above the laboratory reporting limits. These results indicate that PCE is not present above the cleanup level at or below 15 feet bgs.
- Groundwater
  - B6: TPH-D at 2,400 micrograms per liter (µg/L).

B7:

- Soil
  - 10 feet bgs: TPH-D at 7200 mg/kg
- Groundwater
  - TPH-D at 16,000 µg/L

Soil and groundwater samples collected from the remaining explorations at the Site did not contain Site contaminants above their respective Method A cleanup levels.

Three soil-vapor samples were collected from borings during Site characterization activities in 2021 B5, B9, and B10; **Figure 2**). Naphthalene was detected above the MTCA Method B screening level for unrestricted use in all three samples. Soil gas sample B5 also contained PCE above applicable MTCA Method B screening level for unrestricted use.

**Interim Remedial Actions:** The building demolition of the former Firestone building occurred in April 2022. Two remedial excavations were advanced in the vicinity of B6 and B7 to remove the contaminated soil (**Figure 2, Figure 3, Figure 4**).

Performance soil samples were collected from the bottom and sidewalls of the excavations. A soil sample collected from the bottom of EX-1 at a depth of 13 feet bgs contained TPH-O at a concentration of 2400 mg/kg, above the Method A cleanup level (EX1-B1; **Figure 4**). The excavation was extended vertically by another 6 inches, and another confirmation sample collected, which did not contain TPH-D or TPH-O above the Method A cleanup level.

Soils excavated from the vadose zone of EX-1 were stockpiled. Approximately 82 tons of soil from the saturated zone of EX-1 and all soils excavated from EX-2 were transported off site for disposal at a permitted facility. Soil samples collected from stockpiled vadose zone soil excavated from EX-1 did not contain Site contaminants above Method A cleanup levels. Stockpiled soil from EX-1 along with imported fill was used to fill excavations EX-1 and EX-2 to grade. Prior to backfilling, approximately 200 lbs of a remedial product, Petrofix, was applied to the base of the two excavations to aid in breakdown of TPH-D in soil and groundwater.



USGS, 2020, Renton, Washington  
7.5-Minute Quadrangle

Enclosure A Figure 1

Approximate Scale: 1"=1000'



Corporate Office  
17522 Bothell Way Northeast  
Bothell, Washington 98011  
Phone: 425.415.0551  
Fax: 425.415.0311

Former Firestone Complete Auto Care

RGI Project Number:  
2021-465-1

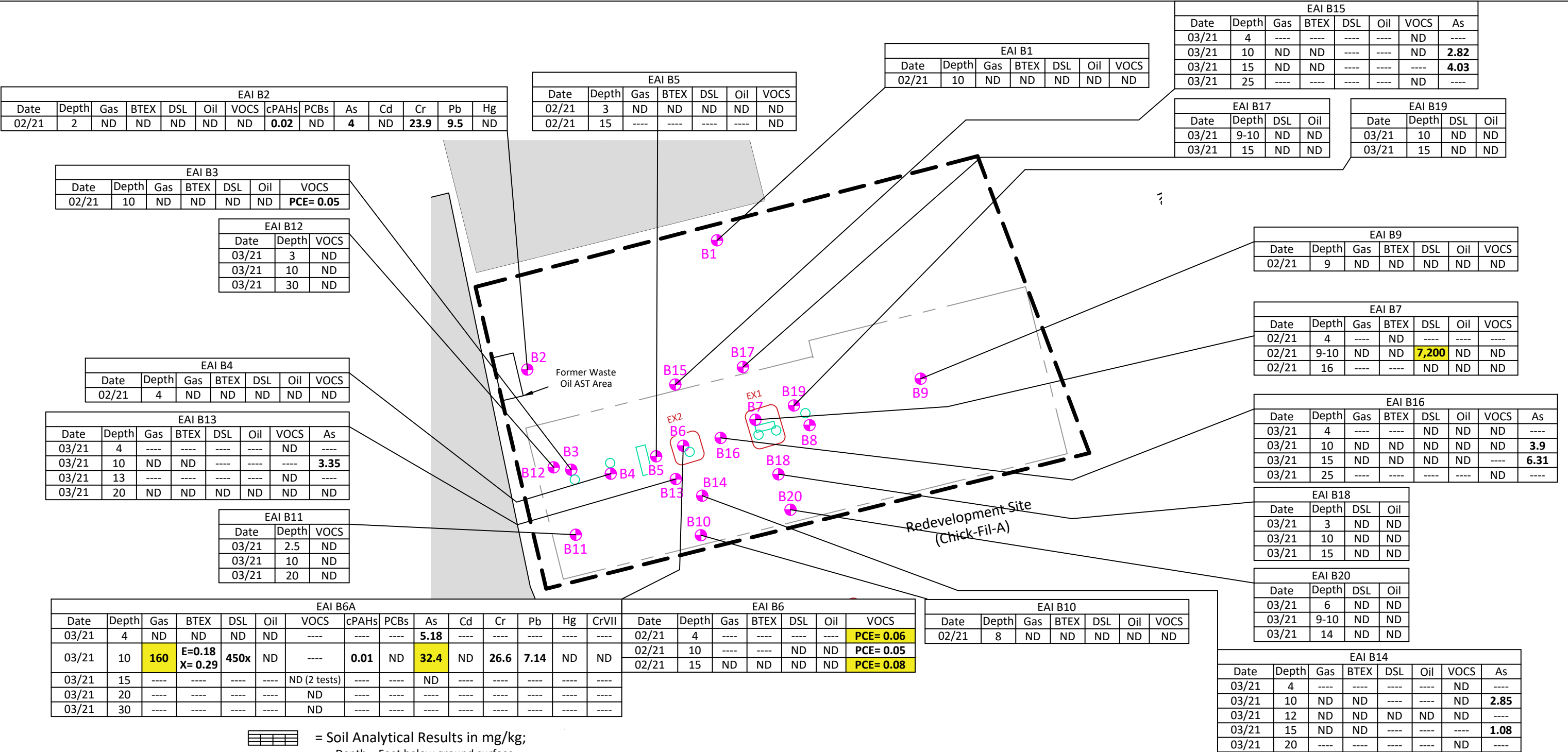
Property Vicinity Map

Figure 1

Date Drawn:  
8/2022

Address: 351 Rainier Avenue South, Renton, Washington 98057





- = Hoist mechanism features
- = Boring by EAI, 03/2021
- = Subject property boundary

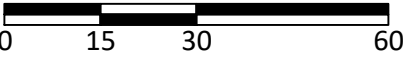
= Soil Analytical Results in mg/kg;  
Depth = Feet below ground surface  
Gas = Gasoline total petroleum hydrocarbons (TPH)  
BTEX = Benzene, toluene, ethylbenzene, xylenes  
DSL/Oil = Diesel/oil TPH  
VOCs = Volatile organic compounds  
Naph. = Naphthalene  
cPAHs = Carcinogenic polycyclic aromatic hydrocarbons  
PCBs = Polychlorinated biphenyls  
x = the sample chromatographic pattern does not resemble the fuel standard used for quantitation.  
PCE = Tetrachloroethene  
As, Cd, Cr, Pb, Hg, CrVI = Total arsenic, cadmium, chromium, lead, mercury, hexavalent chromium  
ND = Not detected above laboratory detection limits  
Bold results indicate concentrations above laboratory detection limits  
Bold and highlighted results (if any) indicate concentrations above MTCA Soil Cleanup Levels



Corporate Office  
17522 Bothell Way Northeast  
Bothell, Washington 98011  
Phone: 425.415.0551  
Fax: 425.415.0311

Enclosure A Figure 2

Approximate Scale: 1"=30'

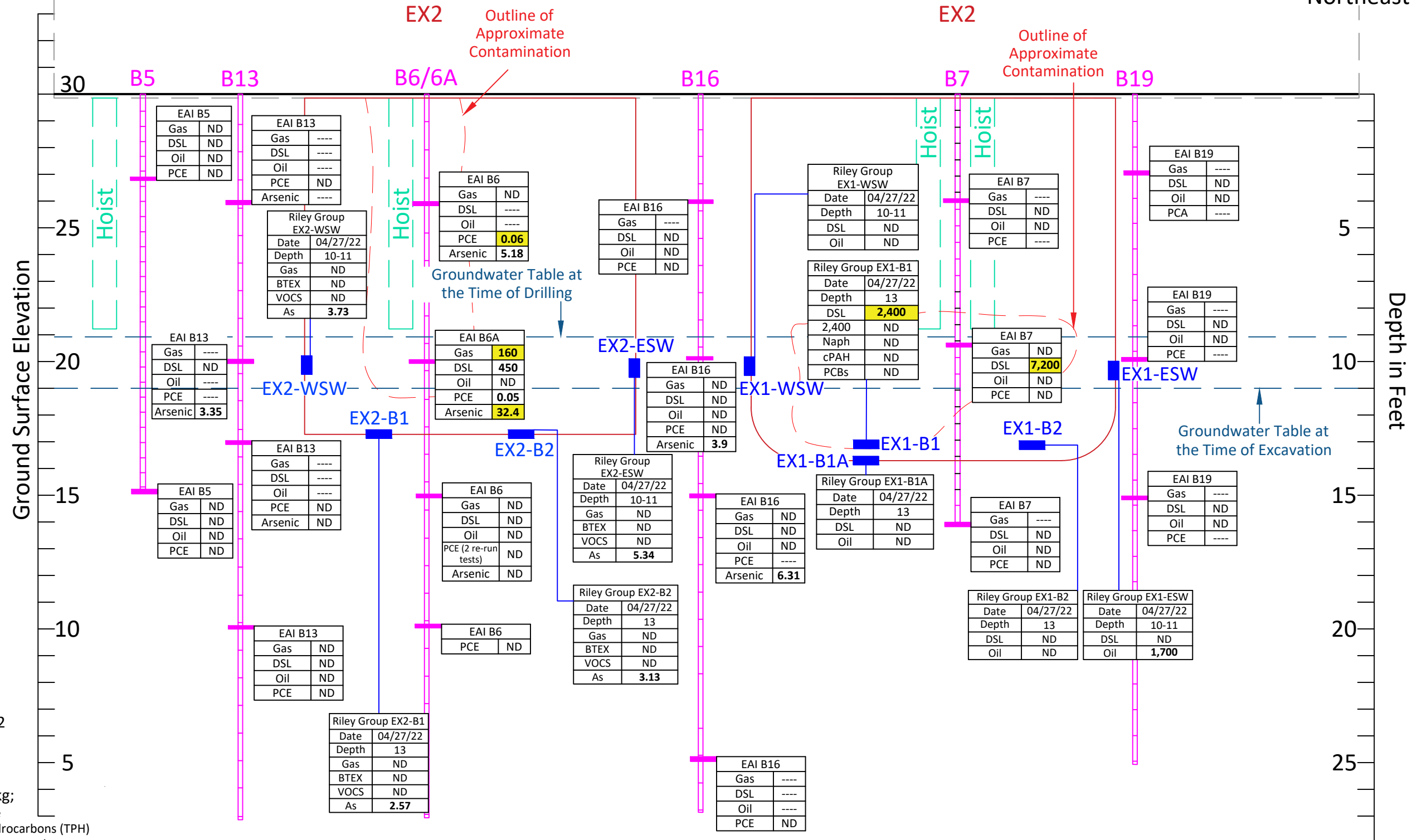


Former Firestone Complete Auto Care		Figure 2	
RGI Project Number:	Property Representation with EAI Soil Analytical Results		Date Drawn:
2021-465-1			8/2022
Address: 351 Rainier Avenue South, Renton, Washington 98057			

Southwest

Former Firestone Building

Northeast

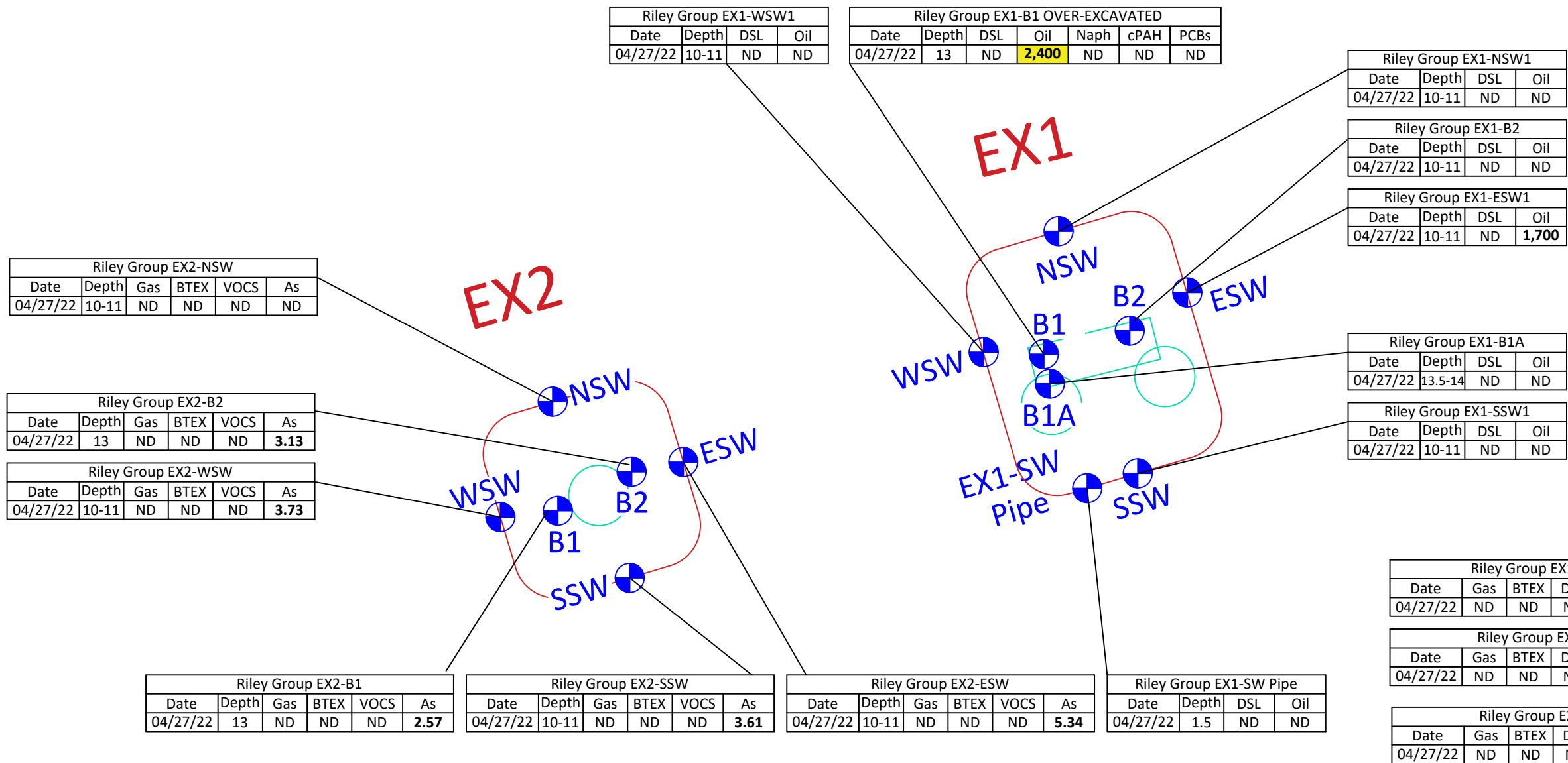


\* Horizontal not to scale unless noted

Enclosure A Figure 3



	Corporate Office 17522 Bothell Way Northeast Bothell, Washington 98011 Phone: 425.415.0551 Fax: 425.415.0311		Former Firestone Complete Auto Care		Figure 4
	RGI Project Number: 2021-465-1		Southwest-Northeast Cross-Section with EAI and RGI Analytical Results		Date Drawn: 8/2022
			Address: 351 Rainier Avenue South, Renton, Washington 98057		



Soil Analytical Results in mg/kg;  
Depth = Feet below ground surface  
Gas = Gasoline total petroleum hydrocarbons (TPH)  
BTEX = Benzene, toluene, ethylbenzene, xylenes  
DSL/Oil = Diesel/oil TPH  
VOCS = Volatile organic compounds  
Naph. = Naphthalene  
cPAHs = Carcinogenic polycyclic aromatic hydrocarbons  
PCBs = Polychlorinated biphenyls  
x = the sample chromatographic pattern does not resemble the fuel standard used for quantitation.  
PCE = Tetrachloroethene  
As, Cd, Cr, Pb, Hg, CrVI = Total arsenic, cadmium, chromium, lead, mercury, hexavalent chromium  
ND = Not detected above laboratory detection limits  
Bold results indicate concentrations above laboratory detection limits  
Bold and highlighted results (if any) indicate concentrations above MTCA Soil Cleanup Levels

= Approximate Excavation Boundary  
 = Hoist mechanism features  
 = Boring by RGI, 04/27/22  
 = Subject property boundary

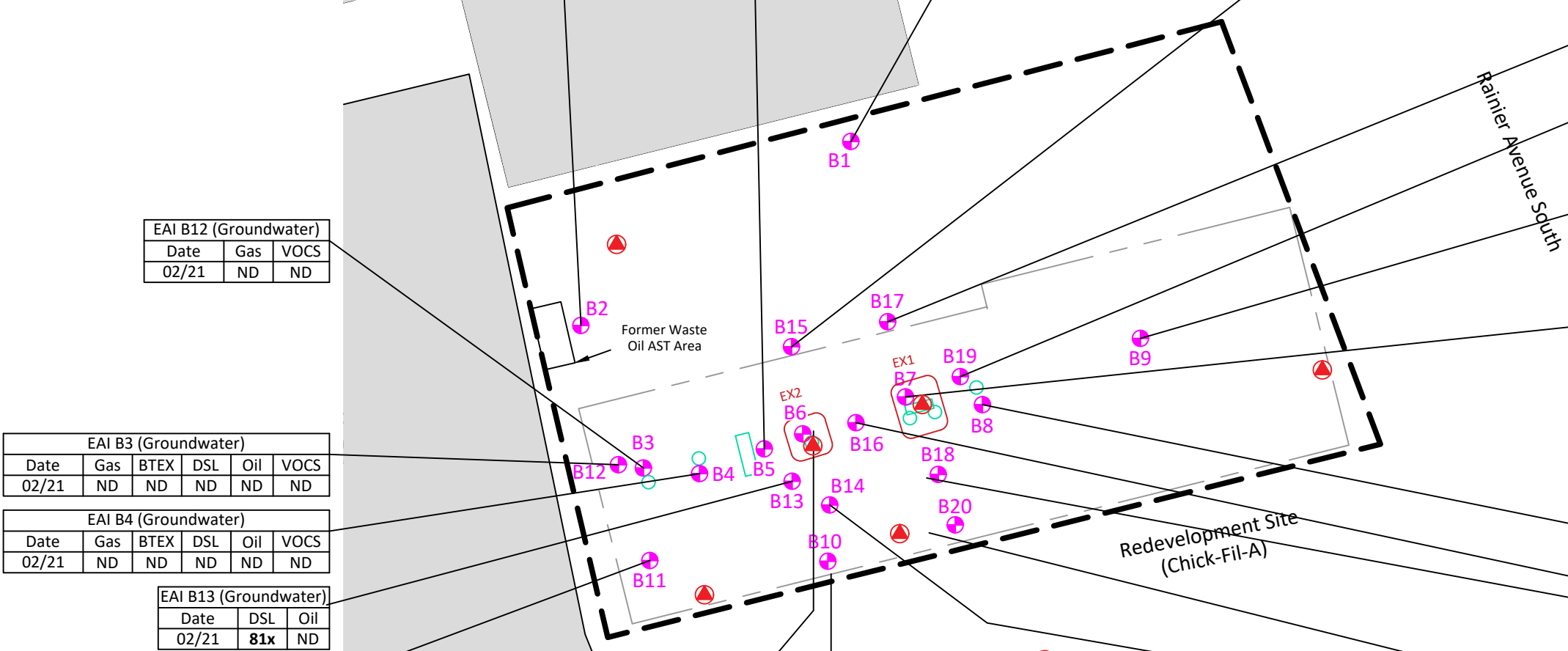


EAI B2 (Groundwater)												
Date	Gas	BTEX	DSL	Oil	VOCS	cPAHs	PCBs	As	Cd	Cr	Pb	Hg
02/21	ND	ND	ND	ND	ND	<b>0.08</b>	ND	ND	ND	ND	ND	ND

EAI B5 (Groundwater)						
Date	Gas	BTEX	DSL	Oil	VOCS	
02/21	ND	ND	ND	ND	ND	

EAI B1 (Groundwater)					
Date	Gas	BTEX	DSL	Oil	VOCS
02/21	ND	ND	ND	ND	ND

EAI B15 (Groundwater)		
Date	DSL	Oil
02/21	<b>130x</b>	ND



EAI B12 (Groundwater)		
Date	Gas	VOCS
02/21	ND	ND

EAI B3 (Groundwater)					
Date	Gas	BTEX	DSL	Oil	VOCS
02/21	ND	ND	ND	ND	ND

EAI B4 (Groundwater)					
Date	Gas	BTEX	DSL	Oil	VOCS
02/21	ND	ND	ND	ND	ND

EAI B13 (Groundwater)		
Date	DSL	Oil
02/21	<b>81x</b>	ND

EAI B11 (Groundwater)		
Date	Gas	VOCS
02/21	ND	ND

EAI B6 (Groundwater)					
Date	Gas	BTEX	DSL	Oil	VOCS
02/21	<b>240</b>	ND	<b>2,400</b>	ND	ND

EAI B10 (Groundwater)									
Date	Gas	B	T	E	X	DSL	Oil	VOCS	
02/21	ND	ND	ND	ND	ND	ND	ND	ND	

EAI B14 (Groundwater)		
Date	DSL	Oil
02/21	ND	ND

EAI B20 (Groundwater)		
Date	DSL	Oil
02/21	ND	ND

EAI B17 (Groundwater)		
Date	DSL	Oil
02/21	<b>86x</b>	ND

EAI B19 (Groundwater)		
Date	DSL	Oil
02/21	ND	ND

EAI B9 (Groundwater)								
Date	Gas	B	T	E	X	DSL	Oil	VOCS
02/21	ND	ND	<b>1.3</b>	ND	ND	ND	ND	ND

EAI B7 (Groundwater)								
Date	Gas	B	T	E	X	DSL	Oil	VOCS
02/21	ND	ND	ND	<b>2.3</b>	ND	<b>16,000</b>	ND	ND

EAI B7A f (Groundwater)					
Date	As	Cd	Cr	Pb	Hg
02/21	ND	ND	ND	ND	ND

EAI B7A (Groundwater)	
Date	cPAH
02/21	<b>0.07</b>
	'Phenanthrene = 2.9 Fluorene = 1.40 Pyrene = 1.90

EAI B8 (Groundwater)							
Date	Gas	B	T	E	X	DSL	Oil
02/21	ND	ND	<b>2.1</b>	<b>1</b>	ND	ND	ND

EAI B18 (Groundwater)		
Date	DSL	Oil
02/21	<b>62x</b>	ND

EAI B16 (Groundwater)		
Date	DSL	Oil
02/21	<b>79x</b>	ND

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 = Groundwater Analytical Results in ug/L;

Gas = Gasoline total petroleum hydrocarbons (TPH)  
BTEX = Benzene, toluene, ethylbenzene, xylenes  
DSL/Oil = Diesel/oil TPH  
VOCS = Volatile organic compounds  
Naph. = Naphthalene  
cPAHs = Carcinogenic polycyclic aromatic hydrocarbons  
PCBs = Polychlorinated biphenyls  
x = the sample chromatographic pattern does not resemble the fuel standard used for quantitation.  
PCE = Tetrachloroethene  
As, Cd, Cr, Pb, Hg, CrVI = Total arsenic, cadmium, chromium, lead, mercury, hexavalent chromium  
ND = Not detected above laboratory detection limits  
Bold results indicate concentrations above laboratory detection limits  
Bold and highlighted results (if any) indicate concentrations above MTCA Groundwater Cleanup Levels

= Proposed monitoring well  
 = Hoist mechanism features  
 = Boring by EAI, 03/2021  
--- = Subject property boundary

Enslosure A Figure 5

Approximate Scale: 1"=30'

Corporate Office  
17522 Bothell Way Northeast  
Bothell, Washington 98011  
Phone: 425.415.0551  
Fax: 425.415.0311

Former Firestone Complete Auto Care		Figure 5
RGI Project Number:	Property Representation with EAI Groundwater Analytical Results and RGI Proposed Monitoring Well Locations	Date Drawn:
2021-465-1		8/2022
Address: 351 Rainier Avenue South, Renton, Washington 98057		