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<b>To:</b> Michael Warfel, LG, LHG, RG  Washington State Department of Ecology, Northwest Regional Office 15700 Dayton Avenue North Shoreline, WA 98133	<b>From:</b> Deitrie Hanson  Stantec Consulting Services Inc.
<b>File:</b> 7-Eleven Store Number (#) 17463 – Federal Way (VCP# NW3368)	<b>Date:</b> August 9, 2023

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**Reference: 17463 Federal Way Cleanup Action Report Second Addendum Memo**

Stantec Consulting Services Inc. (Stantec), on behalf of 7-Eleven, Inc., has prepared this second Addendum Memo to supplement the Site's *Cleanup Action Report* (CAR), dated February 17, 2023, addressing the previous petroleum release at 7-Eleven store number (#) 17463 (the Site), located at 104 Southwest 312<sup>th</sup> Street, Federal Way, Washington. The Site is the Washington State Department of Ecology's Voluntary Cleanup Program (VCP) as Site # NW3368.

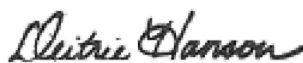
The first Addendum memo submitted on June 1, 2023, presented additional groundwater analytical data collected from well MW-14. This Addendum Memo presents a revised Terrestrial Ecological Evaluation (TEE) form to replace the form previously provided in **Appendix D** in the CAR for the following reasons:

- The previously submitted TEE form did not qualify for exclusion from further evaluation for undeveloped land [WAC 173-340-7491 (1)(c)] because there is greater than 1.5 acres of continuous undeveloped land within 500 feet of the Site as identified by the VCP project manager upon review.
- The attached replacement TEE form exhibits the, "Simplified Evaluation" based on no "Contaminant Analysis" WAC 173-340-7492(2)(c). "No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2." Soil Analytical data to support this is provided in the previously submitted CAR. The updated TEE form documenting the simplified evaluation using the contaminant analysis is attached to this second Addendum Memo.

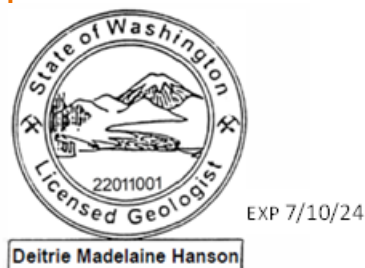
If there are any questions concerning this second Addendum Memo, please contact Paul Fairbairn.

Sincerely,

**Stantec Consulting Service:**



**Deitrie Hanson** LG  
Associate Geologist  
Phone: 425 289 7357  
Fax: 425 869 1190  
Deitrie.Hanson@stantec.com



Attachment: Appendix A – Terrestrial Ecological Evaluation Form (updated)



# Voluntary Cleanup Program

## Washington State Department of Ecology Toxics Cleanup Program

### TERRESTRIAL ECOLOGICAL EVALUATION FORM

Under the Model Toxics Control Act (MTCA), a terrestrial ecological evaluation is necessary if hazardous substances are released into the soils at a Site. In the event of such a release, you must take one of the following three actions as part of your investigation and cleanup of the Site:

1. Document an exclusion from further evaluation using the criteria in WAC 173-340-7491.
2. Conduct a simplified evaluation as set forth in WAC 173-340-7492.
3. Conduct a site-specific evaluation as set forth in WAC 173-340-7493.

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation.

***Completion of this form is not sufficient to document your evaluation. You still need to document your analysis and the basis for your conclusion in your cleanup plan or report.***

If you have questions about how to conduct a terrestrial ecological evaluation, please contact the Ecology site manager assigned to your Site. For additional guidance, please refer to <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Terrestrial-ecological-evaluation>.

#### Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are documenting an evaluation.

Facility/Site Name: 7-Eleven, Inc. Store 17463 Federal Way

Facility/Site Address: 104 Southwest 312th Street, Federal Way, Washington

Facility/Site No: 73389516

VCP Project No.: NW3368

#### Step 2: IDENTIFY EVALUATOR

Please identify below the person who conducted the evaluation and their contact information.

Name: Paul Fairbairn

Title: Principal

Organization: Stantec Consulting Services Inc.

Mailing address: 1687 114th Avenue Southeast Suite 100

City: Bellevue

State: WA

Zip code: 98004

Phone: (425) 289-7343

Fax: (425) 869-1190

E-mail: paul.fairbairn@stantec.com

### Step 3: DOCUMENT EVALUATION TYPE AND RESULTS

#### A. Exclusion from further evaluation.

##### 1. Does the Site qualify for an exclusion from further evaluation?

- ☐ Yes    *If you answered "YES," then answer **Question 2**.*
- ☒ No or Unknown    *If you answered "NO" or "UNKNOWN," then skip to **Step 3B** of this form.*

##### 2. What is the basis for the exclusion? Check all that apply. Then skip to **Step 4** of this form.

Point of Compliance: WAC 173-340-7491(1)(a)

- ☐ All soil contamination is, or will be,\* at least 15 feet below the surface.
- ☐ All soil contamination is, or will be,\* at least 6 feet below the surface (or alternative depth if approved by Ecology), and institutional controls are used to manage remaining contamination.

Barriers to Exposure: WAC 173-340-7491(1)(b)

- ☐ All contaminated soil, is or will be,\* covered by physical barriers (such as buildings or paved roads) that prevent exposure to plants and wildlife, and institutional controls are used to manage remaining contamination.

Undeveloped Land: WAC 173-340-7491(1)(c)

- ☐ There is less than 0.25 acres of contiguous<sup>#</sup> undeveloped<sup>±</sup> land on or within 500 feet of any area of the Site and any of the following chemicals is present: chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.
- ☐ For sites not containing any of the chemicals mentioned above, there is less than 1.5 acres of contiguous<sup>#</sup> undeveloped<sup>±</sup> land on or within 500 feet of any area of the Site.

Background Concentrations: WAC 173-340-7491(1)(d)

- ☐ Concentrations of hazardous substances in soil do not exceed natural background levels as described in WAC 173-340-200 and 173-340-709.

\* An exclusion based on future land use must have a completion date for future development that is acceptable to Ecology.

± "Undeveloped land" is land that is not covered by building, roads, paved areas, or other barriers that would prevent wildlife from feeding on plants, earthworms, insects, or other food in or on the soil.

# "Contiguous" undeveloped land is an area of undeveloped land that is not divided into smaller areas of highways, extensive paving, or similar structures that are likely to reduce the potential use of the overall area by wildlife.

## B. Simplified evaluation.

### 1. Does the Site qualify for a simplified evaluation?

- ☒ Yes    *If you answered "YES," then answer **Question 2** below.*
- ☐ No or Unknown    *If you answered "NO" or "UNKNOWN," then skip to **Step 3C** of this form.*

### 2. Did you conduct a simplified evaluation?

- ☒ Yes    *If you answered "YES," then answer **Question 3** below.*
- ☐ No    *If you answered "NO," then skip to **Step 3C** of this form.*

### 3. Was further evaluation necessary?

- ☐ Yes    *If you answered "YES," then answer **Question 4** below.*
- ☒ No    *If you answered "NO," then answer **Question 5** below.*

### 4. If further evaluation was necessary, what did you do?

- ☐ Used the concentrations listed in Table 749-2 as cleanup levels. *If so, then skip to **Step 4** of this form.*
- ☐ Conducted a site-specific evaluation. *If so, then skip to **Step 3C** of this form.*

### 5. If no further evaluation was necessary, what was the reason? Check all that apply. Then skip to **Step 4** of this form.

Exposure Analysis: WAC 173-340-7492(2)(a)

- ☐ Area of soil contamination at the Site is not more than 350 square feet.
- ☐ Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.

Pathway Analysis: WAC 173-340-7492(2)(b)

- ☐ No potential exposure pathways from soil contamination to ecological receptors.

Contaminant Analysis: WAC 173-340-7492(2)(c)

- ☒ No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.
- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations that exceed the values listed in Table 749-2, and institutional controls are used to manage remaining contamination.
- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays.
- ☐ No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, and institutional controls are used to manage remaining contamination.

**C. Site-specific evaluation.** A site-specific evaluation process consists of two parts: (1) formulating the problem, and (2) selecting the methods for addressing the identified problem. Both steps require consultation with and approval by Ecology. See WAC 173-340-7493(1)(c).

**1. Was there a problem?** See WAC 173-340-7493(2).

- ☐ Yes    *If you answered “YES,” then answer **Question 2** below.*
- ☐ No    *If you answered “NO,” then identify the reason here and then skip to **Question 5** below:*
- ☐ No issues were identified during the problem formulation step.
- ☐ While issues were identified, those issues were addressed by the cleanup actions for protecting human health.

**2. What did you do to resolve the problem?** See WAC 173-340-7493(3).

- ☐ Used the concentrations listed in Table 749-3 as cleanup levels. *If so, then skip to **Question 5** below.*
- ☐ Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate and address the identified problem. *If so, then answer **Questions 3 and 4** below.*

**3. If you conducted further site-specific evaluations, what methods did you use?**  
*Check all that apply. See WAC 173-340-7493(3).*

- ☐ Literature surveys.
- ☐ Soil bioassays.
- ☐ Wildlife exposure model.
- ☐ Biomarkers.
- ☐ Site-specific field studies.
- ☐ Weight of evidence.
- ☐ Other methods approved by Ecology. If so, please specify:

**4. What was the result of those evaluations?**

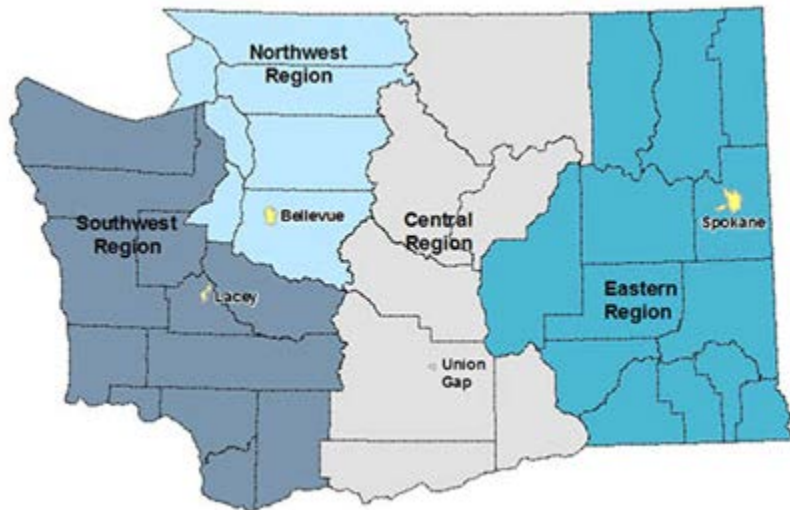
- ☐ Confirmed there was no problem.
- ☐ Confirmed there was a problem and established site-specific cleanup levels.

**5. Have you already obtained Ecology’s approval of both your problem formulation and problem resolution steps?**

- ☐ Yes    If so, please identify the Ecology staff who approved those steps:
- ☐ No

## Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



<b>Northwest Region:</b> Attn: VCP Coordinator 3190 160 <sup>th</sup> Ave. SE Bellevue, WA 98008-5452	<b>Central Region:</b> Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009
<b>Southwest Region:</b> Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775	<b>Eastern Region:</b> Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call 877-833-6341.