

August 14, 2020

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Michael R. Warfel  
Cleanup Project Manager  
Dept. of Ecology, Toxics Cleanup Program  
Northwest Regional Office  
3190 160th Avenue SE  
Bellevue, WA 98008-5452

**Re: Preliminary Determination of Liability, Bellevue Plaza Solvent Plume Site**

Dear Mr. Warfel:

Bellevue Investors I LLC ("Bellevue Investors") has received and reviewed your June 15, 2020 letter regarding the Department of Ecology's preliminary determination that Bellevue Investors is liable for the Bellevue Plaza Solvent Plume Site ("Site"). Bellevue Investors appreciates the extension of time you provided for its response. As further discussed in this letter, Bellevue Investors accepts liability for releases that have occurred on its Bellevue Plaza Property. However, pursuant to RCW 70.105D.020(22)(b)(iv), Bellevue Investors does not accept liability for sources of hazardous substances that were released off the Bellevue Investors' property and have migrated through the groundwater and are impacting Bellevue Investors' property.

**On-Property Release Summary**

Bellevue Investors is the current owner of a property assemblage located generally at 117 106th Avenue NE consisting of King County parcel nos. 154410-0348, 154410-0351, 154410-0352 and 154410-0362, totaling approximately 171,463 square feet ("Bellevue Plaza Property"). Prior to Bellevue Investors' ownership of the Bellevue Plaza Property at the Site, historical gasoline service station operations and/or the most recently operating automotive service facility operations resulted in releases of hazardous substances on parcels 154410-0348 1554410-0351 in the southern portion of the Bellevue Plaza Property. Those releases resulted in a localized area of soil and perched groundwater with total petroleum hydrocarbons as diesel-range organics, oil-range organics and/or as gasoline-range organics at concentrations above the Model Toxics Control Act ("MTCA") Method A cleanup levels. In addition, the halogenated volatile organic compound ("HVOC") 1,2-dichloroethane (1,2 DCA) is also present above Method A cleanup levels in perched groundwater. Please refer to Farallon Consulting's December 12, 2019 release report for additional information.

## Off-Property Release Summary

As noted in your June 15 letter, former and on-going dry cleaning operations have resulted in releases that have migrated from those properties onto the property assemblage owned by Bellevue Investors. One of these sources, the former Kwik Cleaners that was located on parcel no. 154410-0353, 10456 Main Street and is immediately west-adjacent to the Bellevue Plaza Property, released the dry cleaning solvent tetrachloroethene ("PCE") and associated degradation products. The Department of Ecology ("Ecology") has identified this release and has assigned it FSID No. 21152971. PCE and other HVOC contamination released at the former Kwik Cleaners has migrated to and impacted the southwestern portion of the Bellevue Plaza Property.

The other source of PCE and degradation product contamination that has migrated to the Bellevue Plaza Property is the currently operating dry cleaner known as Town & Country Cleaners, located at 310 105th Avenue NE ("Town & Country"). Town & Country released PCE and associated degradation products and Ecology has designated this release as FSID No. 2319. The Town & Country release and associated data is discussed in the December release report. While the December release report demonstrates a release of dry cleaning related hazardous substances and migration of that release to the Bellevue Plaza Property, Bellevue Investors has recently obtained additional data further demonstrating a release of dry cleaning related hazardous substances from Town & Country Cleaners.

Shallow soil gas sampling data obtained from existing shallow wells in the alley immediately east-adjacent to Town & Country shows PCE at very elevated concentrations ranging from 38,000 to 110,000 micrograms per cubic meter ( $\text{ug}/\text{m}^3$ ), which exceeds the MTCA Method B Standard Screening Level For Subslab Soil Gas by over 350 percent. Please see the attached Figure and Table 3 for reference. PCE also was detected at a concentration 100  $\text{ug}/\text{l}$  exceeding the MTCA Method A cleanup level in a shallow groundwater sample collected from approximately 16 feet below ground surface ("bgs") in shallow well TCMW-1 adjacent to Town & Country. These data confirm the data provided in the December release report and further demonstrate the release and presence of an ongoing PCE source and associated degradation products to soil gas, soil, and groundwater from Town & Country.

Additionally, new data from deep groundwater samples demonstrates that the Town & Country release has migrated through the groundwater to the Bellevue Plaza Property. PCE was detected at a concentration of 0.24  $\text{ug}/\text{l}$  in a groundwater sample collected from new deep monitoring well TCMW-2, which was installed in the alley east adjacent to Town & Country. See Table 2. PCE also was detected in soil samples collected at depths ranging from 2.5 to 45 feet below ground surface including concentrations exceeding the MTCA Method A cleanup levels at 2.5 feet and 40 feet bgs during the installation of well TCMW-2 (Table 1). These data indicate that well TCMW-2 is likely up-gradient or cross-gradient of the main source(s) area at Town & Country. Please refer to Tables 1 and 2. Bellevue Investors also obtained deep groundwater data from

further downgradient, via new monitoring wells TT-FMW-3, TT-FMW-6, and TT-FMW-7, which were installed along the western portion of the Taco Time property (please refer to the attached figure for well locations). The highest concentration of PCE in groundwater exceeding the MTCA Method A cleanup level was detected in monitoring well TT-FMW-7, which is the closest cross- and down-gradient well to Town & Country (See Figure and Table 2). PCE also was detected in soil samples collected from monitoring well borings TT-FMW-3, TT-FMW-6, and TT-FMW-7 at depths ranging from 30 to 55 feet bgs. The highest concentration of PCE exceeding the MTCA Method A cleanup level was detected in a soil sample collected from monitoring well boring TT-FMW-7 at 55 feet bgs, which is the closest cross- and down-gradient well to Town & Country (see Figure and Table 1). These data are consistent with and confirm the release and migration of PCE and associated degradation products from Town & Country in soil gas, soil, and groundwater onto the western portion of the Taco Time property and the northwestern and western portions of the down-gradient Bellevue Plaza Property.

### **Liability Discussion**

As the current owner of property with historical releases of hazardous substances from prior owners and operators, Bellevue Investors accepts liability regarding the on-property releases in the southern portion of the Bellevue Plaza Property. These releases are associated with historical gasoline service station operations and/or the most recently operating automotive service facility operations.

However, Bellevue Investors does not accept liability and specifically disputes any liability associated with the off-property releases from the former Kwik Cleaners and Town & Country Cleaners that have migrated through the groundwater and have impacted the Bellevue Plaza Property. MTCA provides that a person who has an ownership interest in property where a hazardous substance has come to be located on that property solely as a result of migration of the hazardous substance to the property through groundwater is not an "owner or operator" under MTCA if certain conditions are met. RCW 70.105D.020(22)(b)(iv)(A)-(D). Bellevue Investors has demonstrated through credible evidence provided in its December 12, 2019 Release Report and as further discussed in this letter that off-property releases of PCE and associated degradation products released at off-property sources have come to be located on the Bellevue Plaza Property solely through groundwater migration. In addition, Bellevue Investors meets the additional criteria provided in MTCA:

- PCE and associated degradation products have not been used or otherwise handled on the Bellevue Plaza Property in any manner; there is no record of any dry cleaner ever having operated on the Bellevue Plaza Property;
- Bellevue Investors recently purchased the property assemblage and has not caused or contributed to any of the releases at the Bellevue Plaza Property;

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- Bellevue Investors has not engaged in any activities to damage or interfere with any remedial actions installed on the Bellevue Plaza Property nor has it, or will it, engage in activities that will result in exposure to this contaminated groundwater. Instead, as you know, Bellevue Investors is cleaning up much of this contamination; and
- Bellevue Investors will, if requested, allow appropriate access by Ecology or the parties that are liable for these releases to conduct remedial actions on the property.

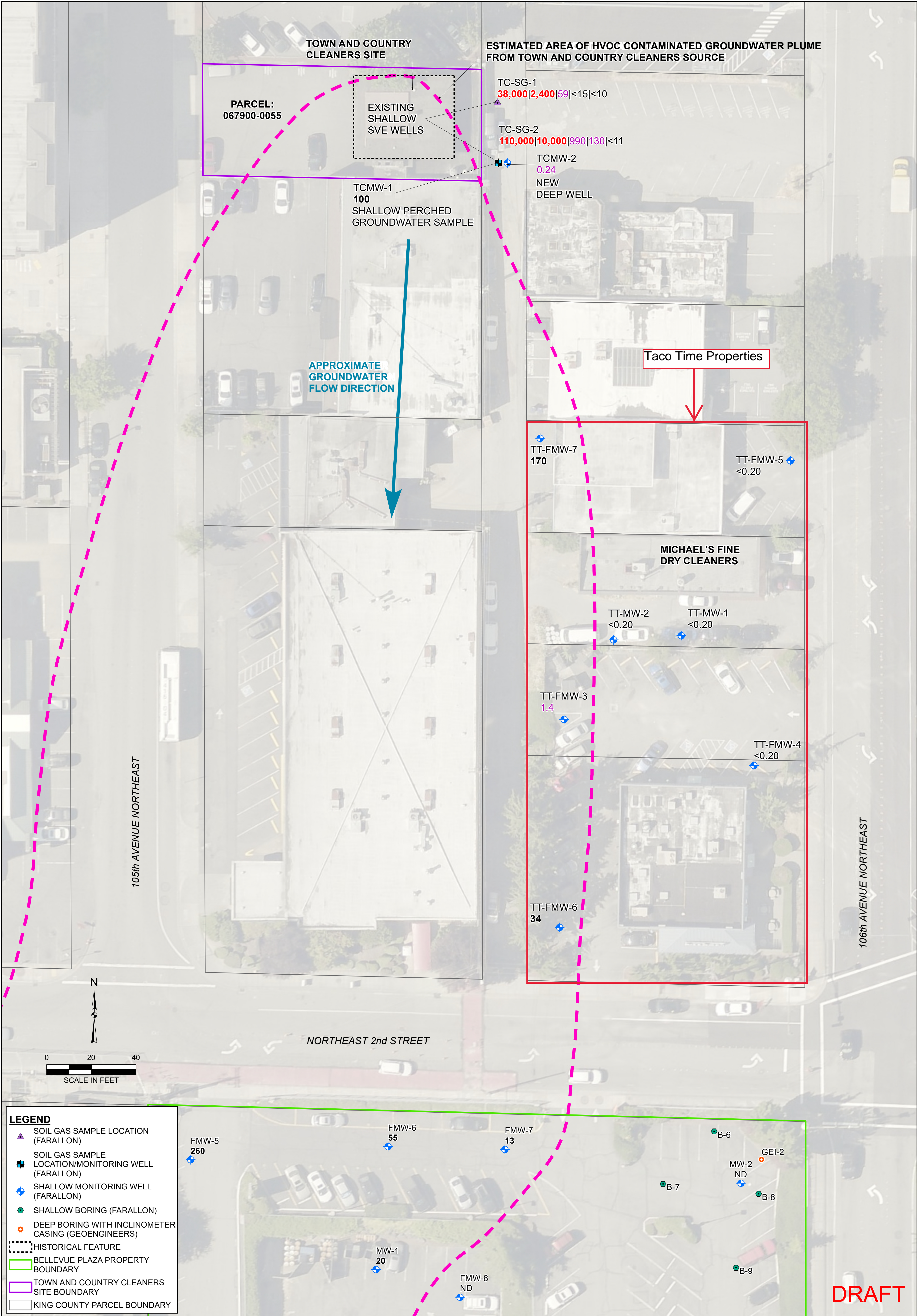
Bellevue Investors is therefore not liable for the former Kwik Cleaners and Town & Country Cleaners releases and it does not accept, and specifically challenges, liability for those releases. As you know, Bellevue Investors and Ecology have initiated discussions for an Agreed Order that will address contamination that has been released on the Bellevue Plaza Property and will also remove all PCE/degradation product contamination in soil from the off-property releases and will also significantly reduce the mass of groundwater contamination associated with these off-property releases. Bellevue Investors looks forward to working with you and Ecology at this Site and will fully cooperate in Ecology's Site-wide efforts to address the off-property releases.

Very truly yours,

MLD  
Enclosures

cc: Nick Lennington, Bellevue Investors I LLC  
Jim Broadlick, Bellevue Investors I, LLC  
Riley Conkin, Farallon Consulting  
Nels Johnson, Attorney General Office







**Table 1**  
**Soil Analytical Results for Halogenated VOCs**  
**117 106th Avenue Northeast**  
**Bellevue, Washington**  
**Farallon PN: 397-034**

Sample Location	Sample Identification	Sample Depth (feet) <sup>1</sup>	Sample Date	Analytical Results (milligrams per kilogram) <sup>2</sup>				
				PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
Town & Country Monitoring Well								
TCMW-2	TCMW-2-2.5	2.5	7/31/2020	0.062	0.0046	0.0041	< 0.0013	< 0.0013
	TCMW-2-5.0	5.0	7/31/2020	0.024	0.0018	< 0.00087	< 0.00087	< 0.00087
	TCMW-2-10.0	10.0	7/31/2020	0.0055	< 0.00065	< 0.00065	< 0.00065	< 0.00065
	TCMW-2-15.0	15.0	7/31/2020	0.0013	0.0012	< 0.00082	< 0.00082	< 0.00082
	TCMW-2-20.0	20.0	7/31/2020	0.032	< 0.00080	< 0.00080	< 0.00080	< 0.00080
	TCMW-2-25.0	25.0	7/31/2020	0.020	< 0.00070	< 0.00070	< 0.00070	< 0.00070
	TCMW-2-30.0	30.0	7/31/2020	0.048	< 0.00082	< 0.00082	< 0.00082	< 0.00082
	TCMW-2-35.0	35.0	7/31/2020	0.0022	< 0.00089	< 0.00089	< 0.00089	< 0.00089
	TCMW-2-40.0	40.0	7/31/2020	0.078	< 0.00086	< 0.00086	< 0.00086	< 0.00086
	TCMW-2-45.0	45.0	7/31/2020	0.0097	< 0.00098	< 0.00098	< 0.00098	< 0.00098
	TCMW-2-50.0	50.0	7/31/2020	< 0.0011	< 0.0011	< 0.0011	< 0.0011	< 0.0011
	TCMW-2-55.0	55.0	7/31/2020	< 0.00090	< 0.00090	< 0.00090	< 0.00090	< 0.00090
	TCMW-2-60.0	60.0	7/31/2020	< 0.00098	< 0.00098	< 0.00098	< 0.00098	< 0.00098
	TCMW-2-65.0	65.0	7/31/2020	< 0.00095	< 0.00095	< 0.00095	< 0.00095	< 0.00095
	TCMW-2-70.0	70.0	7/31/2020	< 0.00098	< 0.00098	< 0.00098	< 0.00098	< 0.00098
TCMW-2-75.0	75.0	7/31/2020	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091	
Taco Time Monitoring Wells								
TT-MW-1	MW-1-5.0	5.0	4/28/2017	< 0.00088	< 0.00088	< 0.00088	< 0.00088	< 0.00088
	MW-1-10.0	10.0	4/28/2017	< 0.00073	< 0.00073	< 0.00073	< 0.00073	< 0.00073
	MW-1-15.0	15.0	4/28/2017	< 0.00075	< 0.00075	< 0.00075	< 0.00075	< 0.00075
	MW-1-30.0	30.0	4/28/2017	< 0.00085	< 0.00085	< 0.00085	< 0.00085	< 0.00085
	MW-1-50.0	50.0	4/28/2017	< 0.00097	< 0.00097	< 0.00097	< 0.00097	< 0.00097
	MW-1-60.0	60.0	4/28/2017	< 0.00084	< 0.00084	< 0.00084	< 0.00084	< 0.00084
	MW-1-75.0	75.0	4/28/2017	< 0.00089	< 0.00089	< 0.00089	< 0.00089	< 0.00089
	MW-1-80.0	80.0	4/28/2017	< 0.00088	< 0.00088	< 0.00088	< 0.00088	< 0.00088
	MW-1-90.0	90.0	4/28/2017	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091
TT-MW-2	MW-2-5.0	5.0	5/1/2017	0.0014	< 0.00077	< 0.00077	< 0.00077	< 0.00077
	MW-2-10.0	10.0	5/1/2017	< 0.00074	< 0.00074	< 0.00074	< 0.00074	< 0.00074
	MW-2-15.0	15.0	5/1/2017	< 0.00087	< 0.00087	< 0.00087	< 0.00087	< 0.00087
	MW-2-30.0	30.0	5/1/2017	< 0.00082	< 0.00082	< 0.00082	< 0.00082	< 0.00082
	MW-2-45.0	45.0	5/1/2017	< 0.0011	< 0.0011	< 0.0011	< 0.0011	< 0.0011
	MW-2-55.0	55.0	5/1/2017	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091
	MW-2-70.0	70.0	5/1/2017	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091
	MW-2-75.0	75.0	5/1/2017	< 0.00087	< 0.00087	< 0.00087	< 0.00087	< 0.00087
TT-FMW-3	FMW-3-5.0	5.0	7/22/2020	< 0.00077	< 0.00077	< 0.00077	< 0.00077	< 0.00077
	FMW-3-10.0	10.0	7/22/2020	< 0.00075	< 0.00075	< 0.00075	< 0.00075	< 0.00075
	FMW-3-15.0	15.0	7/22/2020	< 0.00077	< 0.00077	< 0.00077	< 0.00077	< 0.00077
	FMW-3-20.0	20.0	7/22/2020	< 0.00072	< 0.00072	< 0.00072	< 0.00072	< 0.00072
	FMW-3-25.0	25.0	7/22/2020	< 0.00082	< 0.00082	< 0.00082	< 0.00082	< 0.00082
	FMW-3-30.0	30.0	7/22/2020	< 0.00067	< 0.00067	< 0.00067	< 0.00067	< 0.00067
	FMW-3-35.0	35.0	7/22/2020	< 0.00066	< 0.00066	< 0.00066	< 0.00066	< 0.00066
	FMW-3-40.0	40.0	7/22/2020	0.0022	< 0.00076	< 0.00076	< 0.00076	< 0.00076
	FMW-3-45.0	45.0	7/22/2020	< 0.00076	< 0.00076	< 0.00076	< 0.00076	< 0.00076
	FMW-3-50.0	50.0	7/22/2020	< 0.00043	< 0.00043	< 0.00043	< 0.00043	< 0.00043
	FMW-3-55.0	55.0	7/22/2020	< 0.00084	< 0.00084	< 0.00084	< 0.00084	< 0.00084
	FMW-3-60.0	60.0	7/22/2020	< 0.00085	< 0.00085	< 0.00085	< 0.00085	< 0.00085
	FMW-3-65.0	65.0	7/22/2020	< 0.00080	< 0.00080	< 0.00080	< 0.00080	< 0.00080
FMW-3-70.0	70.0	7/22/2020	< 0.00086	< 0.00086	< 0.00086	< 0.00086	< 0.00086	
MTCA Cleanup Levels for Soil <sup>3</sup>				0.05	0.03	160 <sup>4</sup>	1,600 <sup>4</sup>	0.67 <sup>4</sup>

**Table 1**  
**Soil Analytical Results for Halogenated VOCs**  
**117 106th Avenue Northeast**  
**Bellevue, Washington**  
**Farallon PN: 397-034**

Sample Location	Sample Identification	Sample Depth (feet) <sup>1</sup>	Sample Date	Analytical Results (milligrams per kilogram) <sup>2</sup>				
				PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
TT-FMW-4	FMW-4-5.0	5.0	7/23/2020	< 0.00079	< 0.00079	< 0.00079	< 0.00079	< 0.00079
	FMW-4-10.0	10.0	7/23/2020	< 0.00072	< 0.00072	< 0.00072	< 0.00072	< 0.00072
	FMW-4-15.0	15.0	7/23/2020	< 0.00077	< 0.00077	< 0.00077	< 0.00077	< 0.00077
	FMW-4-20.0	20.0	7/23/2020	< 0.00081	< 0.00081	< 0.00081	< 0.00081	< 0.00081
	FMW-4-25.0	25.0	7/23/2020	< 0.00084	< 0.00084	< 0.00084	< 0.00084	< 0.00084
	FMW-4-30.0	30.0	7/23/2020	< 0.00083	< 0.00083	< 0.00083	< 0.00083	< 0.00083
	FMW-4-35.0	35.0	7/23/2020	< 0.00076	< 0.00076	< 0.00076	< 0.00076	< 0.00076
	FMW-4-40.0	40.0	7/23/2020	< 0.00096	< 0.00096	< 0.00096	< 0.00096	< 0.00096
	FMW-4-45.0	45.0	7/23/2020	< 0.00086	< 0.00086	< 0.00086	< 0.00086	< 0.00086
	FMW-4-50.0	50.0	7/23/2020	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010
	FMW-4-55.0	55.0	7/23/2020	< 0.00084	< 0.00084	< 0.00084	< 0.00084	< 0.00084
	FMW-4-60.0	60.0	7/23/2020	< 0.00087	< 0.00087	< 0.00087	< 0.00087	< 0.00087
	FMW-4-65.0	65.0	7/23/2020	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091
	FMW-4-70.0	70.0	7/23/2020	< 0.00097	< 0.00097	< 0.00097	< 0.00097	< 0.00097
TT-FMW-5	FMW-5-5.0	5.0	7/24/2020	< 0.00078	< 0.00078	< 0.00078	< 0.00078	< 0.00078
	FMW-5-10.0	10.0	7/24/2020	< 0.00074	< 0.00074	< 0.00074	< 0.00074	< 0.00074
	FMW-5-15.0	15.0	7/24/2020	< 0.00082	< 0.00082	< 0.00082	< 0.00082	< 0.00082
	FMW-5-20.0	20.0	7/24/2020	< 0.00038	< 0.00038	< 0.00038	< 0.00038	< 0.00038
	FMW-5-25.0	25.0	7/24/2020	< 0.00078	< 0.00078	< 0.00078	< 0.00078	< 0.00078
	FMW-5-30.0	30.0	7/24/2020	< 0.00083	< 0.00083	< 0.00083	< 0.00083	< 0.00083
	FMW-5-35.0	35.0	7/24/2020	< 0.00078	< 0.00078	< 0.00078	< 0.00078	< 0.00078
	FMW-5-40.0	40.0	7/24/2020	< 0.00086	< 0.00086	< 0.00086	< 0.00086	< 0.00086
	FMW-5-45.0	45.0	7/24/2020	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010
	FMW-5-50.0	50.0	7/24/2020	< 0.00085	< 0.00085	< 0.00085	< 0.00085	< 0.00085
	FMW-5-55.0	55.0	7/24/2020	< 0.00093	< 0.00093	< 0.00093	< 0.00093	< 0.00093
	FMW-5-60.0	60.0	7/24/2020	< 0.00089	< 0.00089	< 0.00089	< 0.00089	< 0.00089
	FMW-5-65.0	65.0	7/24/2020	< 0.00083	< 0.00083	< 0.00083	< 0.00083	< 0.00083
	FMW-5-70.0	70.0	7/24/2020	< 0.00089	< 0.00089	< 0.00089	< 0.00089	< 0.00089
	FMW-5-75.0	75.0	7/24/2020	< 0.00088	< 0.00088	< 0.00088	< 0.00088	< 0.00088
	FMW-5-80.0	80.0	7/24/2020	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091
TT-FMW-6	FMW-6-5.0	5.0	7/27/2020	< 0.00075	< 0.00075	< 0.00075	< 0.00075	< 0.00075
	FMW-6-10.0	10.0	7/27/2020	< 0.00082	< 0.00082	< 0.00082	< 0.00082	< 0.00082
	FMW-6-15.0	15.0	7/27/2020	< 0.0011	< 0.0011	< 0.0011	< 0.0011	< 0.0011
	FMW-6-20.0	20.0	7/27/2020	< 0.00079	< 0.00079	< 0.00079	< 0.00079	< 0.00079
	FMW-6-25.0	25.0	7/27/2020	< 0.00078	< 0.00078	< 0.00078	< 0.00078	< 0.00078
	FMW-6-30.0	30.0	7/27/2020	0.0014	< 0.00091	< 0.00091	< 0.00091	< 0.00091
	FMW-6-35.0	35.0	7/27/2020	0.0026	< 0.00087	< 0.00087	< 0.00087	< 0.00087
	FMW-6-40.0	40.0	7/27/2020	< 0.00076	< 0.00076	< 0.00076	< 0.00076	< 0.00076
	FMW-6-45.0	45.0	7/27/2020	< 0.00083	< 0.00083	< 0.00083	< 0.00083	< 0.00083
	FMW-6-50.0	50.0	7/27/2020	0.022	0.0048	< 0.00090	< 0.00090	< 0.00090
	FMW-6-55.0	55.0	7/27/2020	0.0018	< 0.00097	< 0.00097	< 0.00097	< 0.00097
	FMW-6-60.0	60.0	7/27/2020	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010
	FMW-6-65.0	65.0	7/27/2020	< 0.0010	< 0.0010	< 0.0010	< 0.0010	< 0.0010
	FMW-6-70.0	70.0	7/27/2020	< 0.00087	< 0.00087	< 0.00087	< 0.00087	< 0.00087
MTCA Cleanup Levels for Soil <sup>3</sup>				0.05	0.03	160 <sup>4</sup>	1,600 <sup>4</sup>	0.67 <sup>4</sup>

**Table 1**  
**Soil Analytical Results for Halogenated VOCs**  
**117 106th Avenue Northeast**  
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**Farallon PN: 397-034**

Sample Location	Sample Identification	Sample Depth (feet) <sup>1</sup>	Sample Date	Analytical Results (milligrams per kilogram) <sup>2</sup>				
				PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
TT-FMW-7	FMW-7-5.0	5.0	7/28/2020	< 0.00084	< 0.00084	< 0.00084	< 0.00084	< 0.00084
	FMW-7-10.0	10.0	7/28/2020	< 0.00093	< 0.00093	< 0.00093	< 0.00093	< 0.00093
	FMW-7-15.0	15.0	7/28/2020	< 0.00082	< 0.00082	< 0.00082	< 0.00082	< 0.00082
	FMW-7-20.0	20.0	7/28/2020	0.0020	< 0.00074	< 0.00074	< 0.00074	< 0.00074
	FMW-7-25.0	25.0	7/28/2020	< 0.00088	< 0.00088	< 0.00088	< 0.00088	< 0.00088
	FMW-7-30.0	30.0	7/28/2020	< 0.00085	< 0.00085	< 0.00085	< 0.00085	< 0.00085
	FMW-7-35.0	35.0	7/28/2020	0.0043	< 0.0010	< 0.0010	< 0.0010	< 0.0010
	FMW-7-40.0	40.0	7/28/2020	0.0027	< 0.00091	< 0.00091	< 0.00091	< 0.00091
	FMW-7-45.0	45.0	7/28/2020	< 0.00095	< 0.00095	< 0.00095	< 0.00095	< 0.00095
	FMW-7-50.0	50.0	7/28/2020	< 0.00090	< 0.00090	< 0.00090	< 0.00090	< 0.00090
	FMW-7-55.0	55.0	7/28/2020	0.17	0.013	< 0.0010	< 0.0010	< 0.0010
	FMW-7-60.0	60.0	7/28/2020	< 0.00089	< 0.00089	< 0.00089	< 0.00089	< 0.00089
	FMW-7-65.0	65.0	7/28/2020	< 0.00096	< 0.00096	< 0.00096	< 0.00096	< 0.00096
	FMW-7-70.0	70.0	7/28/2020	< 0.00091	< 0.00091	< 0.00091	< 0.00091	< 0.00091
MTCA Cleanup Levels for Soil <sup>3</sup>				0.05	0.03	160 <sup>4</sup>	1,600 <sup>4</sup>	0.67 <sup>4</sup>

**NOTES:**

Results in **bold** denote concentrations exceeding applicable cleanup levels.

Results highlighted **yellow** denote concentrations exceeding laboratory reporting limits.

< denotes analyte not detected at or exceeding the reporting limit listed.

<sup>1</sup>Depth in feet below ground surface.

<sup>2</sup>Analyzed by U.S. Environmental Protection Agency Method 8260D.

<sup>3</sup>Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013, unless otherwise noted.

<sup>4</sup>Washington State Cleanup Levels and Risk Calculations under the Washington State Model Toxics Control Act Cleanup Regulation, Standard Method B Formula Values for Soil (Unrestricted Land Use) - Direct Contact (Ingestion Only) and Leaching Pathway, <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC>

PCE = tetrachloroethene

TCE = trichloroethene

VOC = volatile organic compound



**Table 2**  
**Groundwater Analytical Results for Halogenated VOCs**  
**117 106th Avenue Northeast**  
**Bellevue, Washington**  
**Farallon PN: 397-034**

Sample Location	Sample Date	Sample Identification	Analytical Results (micrograms per liter) <sup>1</sup>				
			PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
Shallow Monitoring Well - Town & Country Cleaners Site							
TCMW-1	7/31/2020	TCMW-1-GW-073120	100	7.0	1.5	< 0.80	< 0.80
Deep Monitoring Well - Town & Country Cleaners Site							
TCMW-2	8/3/2020	TCMW-2-080320	0.24	< 0.20	< 0.20	< 0.20	< 0.20
Deep Monitoring Wells - Taco Time Property							
TT-MW-1	7/30/2020	MW-1-073020	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
TT-MW-2	7/30/2020	MW-2-073020	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
TT-FMW-3	7/30/2020	FMW-3-073020	1.4	< 0.20	< 0.20	< 0.20	< 0.20
TT-FMW-4	7/30/2020	FMW-4-073020	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
TT-FMW-5	7/31/2020	FMW-5-073120	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
TT-FMW-6	7/31/2020	FMW-6-073120	34	8.7	1.3	< 0.20	< 0.20
TT-FMW-7	7/31/2020	FMW-7-073120	170	< 1.0	< 1.0	< 1.0	< 1.0
MTCA Cleanup Levels for Groundwater <sup>2</sup>			5	5	16 <sup>3</sup>	160 <sup>3</sup>	0.2

NOTES:

Results in **bold** denote concentrations exceeding applicable cleanup levels.

Results highlighted **yellow** denote concentrations exceeding laboratory reporting limits.

< denotes analyte not detected at or exceeding the reporting limit listed.

<sup>1</sup>Analyzed by U.S. Environmental Protection Agency Method 8260D.

<sup>2</sup>Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013, unless otherwise noted.

<sup>3</sup>Washington State Model Toxics Control Act Cleanup Regulation Cleanup Levels and Risk Calculations, Standard Method B  
Values for Groundwater, <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC>

PCE = tetrachloroethene

TCE = trichloroethene

VOC = volatile organic compound

**Table 3**  
**Soil Gas Analytical Results for Select Halogenated Volatile Organic Compounds**  
**Town Country Cleaners Site**  
**Bellevue, Washington**  
**Farallon PN: 397-034**

Sample Location	Sample Date	Sample Identification	Analytical Results (micrograms per cubic meter) <sup>1</sup>				
			PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
TC-1	7/31/2020	TC-1-073120	38,000 E	2,400	59	< 15	< 10
TC-2	7/31/2020	TC-2-073120	110,000 E	10,000 E	990	130	< 11
MTCA Method B Soil Gas Screening Level Residential <sup>2</sup>			320	12	NE	NE	9.4
Modified MTCA Method B Soil Gas Screening Levels for Commercial Exposure Scenario <sup>3</sup>			1,672	64.8	NE	NE	49

**NOTES:**

Results in **bold** denote concentrations exceeding applicable cleanup levels.

Results highlighted **yellow** denote concentrations exceeding laboratory reporting limits.

< denotes analyte not detected at or exceeding the reporting limit listed.

<sup>1</sup>Analyzed by U.S. Environmental Protection Agency Method TO-15.

E = analyte response exceeds instrument calibration range, result is an estimate.

NE = not established

PCE = tetrachloroethene

TCE = trichloroethene

<sup>2</sup>Washington State Model Toxics Control Act Cleanup Regulation Cleanup Levels and Risk Calculations, Standard Method B Values for Sub-Slab Soil Gas Screening Level, updated May 2019, <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC>

<sup>3</sup>MTCA Method B Screening Level for Shallow Soil Gas, Table B-1 of Appendix B of the Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action dated October 2009, revised April 6, 2015. Modified Commercial Exposure Scenario. Inhalation Cancer Potency Factor for PCE and TCE as revised by U.S. Environmental Protection Agency in the Integrated Risk Information System database in February 2012. Specifics provided in the following tables.