

**From:** [Song, Jing \(ECY\)](#)  
**To:** ["Troy Bussey"; "CRISTI ACUNA"](#)  
**Cc:** ["Kim Seely"; "Phil Mitchell"; Kirkman, Donna K. \(ECY\)](#)  
**Subject:** NW3397—Coastal Gas Auburn Technical Assistance on Interim Action Work Plan  
**Date:** Wednesday, July 31, 2024 9:32:01 AM

---

Troy,

Thank you for submitting the *Interim Action Work Plan (IAWP)*, dated April 2024, for the Coastal Gas Auburn site, located at 3317 Auburn Way N, Auburn. Ecology reviewed the *IAWP* and has the following comments:

**1. Ecology concurs with the Interim action proposed in the IAWP.**

Under MTCA, interim action (IA) provides partial cleanup of a site and may occur anytime during the cleanup process. Although there are data gaps for Site characterization, Ecology concurs that conducting the proposed IA can address the vapor intrusion issue to the vacant automobile showroom that may become substantially worse if the IA is delayed. Please follow the IAWP and let Ecology know if anything unexpected occurs during the IA.

**2. The remedial investigation (RI) screening levels need to be updated.**

Ecology reviewed Section 3.2 and Appendix E of the *IAWP*. Ecology has the following suggested changes on the screening levels:

Medium Table, Units)	Chemical	Endpoint	Value in IAWP	Correct Value
Groundwater	Naphthalene (PAH section)	VI	No Value	8.9
Table 1	Naphthalene (VOC section)	VI	8.8	8.9
ug/L	Mercury	VI	No Value	0.3
	1,1,2-Trichloroethane	DW	5	3
	cis- & trans-1,3-Dichloropropane	DW	No Value	0.44
	cis- & trans-1,3-Dichloropropane	VI	No Value	1.6
	Methylene bromide	VI	97	87
	MTBE	VI	860	800
	n-Hexane	VI	7.2	4.1
Soil	1,1,2-Trichloroethane	Leach	0.052	0.031
Table 2	1,2-Dibromo-3-chloropropane	Leach	0.00058	0.0019
mg/kg	1,2-Dichloroethane	Leach	0.025	0.035
(Note a)	1,3-Dichlorobenzene	Leach	223	No Value

	1,4-Dichlorobenzene	Leach	0.28	4.2
	Acenaphthene	Leach	81	200
	Anthracene	Leach	4.3	4,700
	Benzene	Leach	0.023	0.047
	Bromochloromethane	Leach	4,916	No Value
	Carbon tetrachloride	Leach	0.011	0.09
	Chloroethan	Leach	95	No Value
	Chloromethane	Leach	0.75	No Value
	cis- & trans-1,3-Dichloropropene	DC	No Value	10
	cis- & trans-1,3-Dichloropropene	Leach	No Value	0.0028
	Dibromomethane	Leach	0.47	0.75
	Dichlorobromomethane	Leach	0.035	0.048
	Fluoranthene	Leach	54	2,600
	Fluorene	Leach	55	210
	Mercury	DC	24	No Value
	Naphthalene (VOC section)	Leach	0.92	17
	Pyrene	Leach	39	1,400
	Total cPAHs	Leach	6.6	16
	Total xylenes	Leach	7.6	38
	trans-1,2-Dichloroethylene	Leach	0.59	0.76
	TCE	Leach	0.017	0.049
	Trichlorofluoromethane	Leach	1.5	30
		Hcc		
Table 2a	Total cPAHs	(unitless)	3.60E-06	8.94E-06
		Resid &		
Table 3	Benzyl chloride	Comm	0.051/0.24	No values
Air	cis- & trans-1,3-Dichloropropene	Resid	No Value	0.63
ug/m3	cis- & trans-1,3-Dichloropropene	Comm	No value	2.9
	Cyclohexane	Comm	23,360	6,000
	Ethyl acetate	Comm	273	70
	Heptane	Comm	1,557	400
	Methyl methacrylate	Comm	2,725	700
	n-Propylbenzene	Comm	3,893	1,000
Table 4	cis- & trans- 1,3-Dichloropropene	Resid	No value	21
Soil gas	cis- & trans- 1,3-Dichloropropene	Comm	No value	97

ug/m3

---

VI - vapor intrusion

DW - drinking water

Leach – soil leaching to groundwater

DC - direct contact

Resid - residential

Comm - commercial

Note a: The foc used to calculate leaching cleanup levels was adjusted to 0.42%, consistent with note (3) in Table 2a of the *IAWP, Appendix E*.

Please work with Ecology if you have questions regarding the suggested changes on the screening levels.

Please note, cleanup levels will be established based on the final Site conceptual model after RI is completed. The cleanup levels are likely different than the screening levels.

**3. RI needs to be completed after IA is completed.**

Ecology appreciates the data gap analysis in the *IAWP*. After the proposed IA, additional Site characterization is needed to address the data gaps and complete the RI.

Thank you again for submitting the *IAWP*. Ecology is looking forward to working with you on this Site and eventually achieve the cleanup goal.

**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)