



February 29, 2024

Christopher Maurer
Washington State Department of Ecology
300 Desmond Drive Southeast
Lacey, Washington 98503

**RE: COMPLIANCE MONITORING PLAN
MONROE AUTO SALVAGE
500 EAST FREMONT STREET
MONROE, WASHINGTON
FARALLON PN: 2747-001**

Dear Christopher Maurer:

Farallon Consulting, L.L.C. (Farallon) has prepared this Compliance Monitoring Plan on behalf of River's Edge WA LLLP to provide procedures for compliance monitoring for the property at 500 East Fremont Street in Monroe, Washington (herein referred to as the Property) (Figure 1).

The "Site," as defined under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), Chapter 173-340 of the Washington Administrative Code (WAC 173-340), comprises all areas where hazardous substances have come to be located at concentrations exceeding applicable cleanup levels. The Site is identified by the Washington State Department of Ecology (Ecology) as Monroe Auto Salvage located at 526 Simons Road in Monroe, Washington. The Site is enrolled in the Ecology Voluntary Cleanup Program (VCP) as VCP Project No. NW3251.

Between 1997 and 2019, multiple remedial actions were conducted at the Property to protect human health and the environment and facilitate redevelopment of the Property with affordable housing. Approximately 5,765 tons of contaminated soil was excavated to the maximum extent practicable. Following excavation, the Property was developed with five apartment buildings and an asphalt-paved parking lot, which act as an engineered cap.

Preliminary screening levels were established based on the potential exposure pathways and receptors to identify a conservative basis for defining the extent of contamination for each hazardous substance and medium at the Site. Based on the comparison of current data for the Site against the preliminary screening levels, the confirmed media of concern at the Site are soil and groundwater. Surface water and sediments were evaluated; however,



the current Site data demonstrated that the transport pathways are incomplete. Based on the results from the remedial actions conducted at the Property, the constituents of concern (COCs) for the Site are total petroleum hydrocarbons as diesel-range organics (DRO) and as oil-range organics (ORO), cadmium, and lead. Soil and groundwater analytical results following the 2019 cleanup action indicate that contaminated soil and/or groundwater remains in four localized areas on the southwestern portion of the Property (Figure 2). The four localized areas of contaminated soil and/or groundwater are not accessible due to recently constructed buildings and protected environmentally critical areas.

Compliance groundwater monitoring and periodic monitoring and maintenance of the cap will be conducted as part of the cleanup action to ensure that MTCA cleanup levels are maintained at the points of compliance and that the cleanup action protects future users of the Site, the environment, and the integrity of the cleanup action.

The scope of work and methodology for compliance groundwater monitoring and periodic monitoring and maintenance of the cap are described below.

COMPLIANCE GROUNDWATER MONITORING

Localized areas of residual contaminated groundwater are present in two areas. However, data demonstrate that concentrations of DRO and ORO are naturally attenuating following completion of the remedial action in 2019, and dissolved arsenic has been less than the natural background concentration for the Snohomish Basin in all groundwater samples collected following completion of the 2019 remedial action. Compliance groundwater monitoring is necessary to demonstrate the long-term effectiveness of the completed remedial actions. The scope of work and methodology for compliance groundwater monitoring is described below.

MONITORING WELL NETWORK

The compliance groundwater monitoring well network consists of groundwater monitoring wells DP3-MW through DP5-MW as shown on Figure 3.

If any of the monitoring wells are determined to be damaged, the damage will be promptly repaired, and a letter documenting this work will be submitted to Ecology within 30 days of completing the repairs.

If any of the compliance wells must be decommissioned during future Property development or are damaged beyond repair, replacement monitoring wells will be installed, at the same



or similar locations approved by Ecology. Any monitoring well decommissioned at the Property will be decommissioned in accordance with the Minimum Standards for Construction and Maintenance of Wells as established in WAC 173-160. A decommissioning report will be submitted to Ecology within 30 days after completion of decommissioning.

Any new monitoring well will be constructed in accordance with the Minimum Standards for Construction and Maintenance of Wells as established in WAC 173-160. A well installation log will be provided to Ecology within 30 days after construction of the well.

GROUNDWATER MONITORING AND LABORATORY ANALYSIS

Groundwater monitoring events will include measuring and sampling three monitoring wells, DP3-MW through DP5-MW, located on the southwestern portion of the Property (Figure 3). Field personnel will remove the locking well cap from each monitoring well, and groundwater levels will be allowed to equilibrate to atmospheric pressure for at least 30 minutes. The depth to groundwater will be measured in each monitoring well to the nearest 0.01 foot using an electronic water-level measuring device to the top of the well casing. The total depth of each monitoring well will be measured to evaluate siltation of the well-screen interval and to calculate the submerged well-casing volume. Reusable equipment will be decontaminated between uses at each location.

Each monitoring well will be purged at a low-flow rate ranging from 100 to 300 milliliters per minute using a peristaltic or bladder pump and dedicated tubing. Temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential will be monitored during purging to determine when stabilization of these parameters occurs. Following stabilization of the parameters, groundwater samples will be collected directly from the low-flow pump outlet. Samples analyzed for dissolved metals will be field-filtered.

Laboratory-prepared sample containers will be filled directly from the pump outlet, with care taken to minimize turbulence and handling of the seal or lid of the container when the samples are placed into the containers. The groundwater samples will be placed on ice in a cooler under standard chain-of-custody protocols and submitted to an Ecology-accredited laboratory for the following analysis:

- Total and dissolved arsenic, cadmium, and lead by U.S. Environmental Protection Agency (EPA) Method 200.8/7470; and
- DRO and ORO by Northwest Method NWTPH-Dx with and without a silica gel cleanup process.



MONITORING FREQUENCY

Groundwater monitoring events will be conducted on an annual basis, beginning immediately after recordation of the environmental covenant. To end the compliance groundwater monitoring, four quarterly compliance groundwater monitoring events are required. Those quarterly events may begin as early as 2024.

REPORTING

A groundwater monitoring report summarizing the groundwater monitoring events will be prepared and submitted to Ecology prior to the first 5-year periodic review. The groundwater monitoring report will include the following:

- Summary of the groundwater monitoring events;
- Figures showing locations of relevant monitoring wells and Site features, groundwater contours, and groundwater analytical results;
- Tables providing analytical results and water level elevations;
- Discussion of the groundwater sample analytical results and comparison to MTCA cleanup levels; and
- Laboratory analytical reports.

NOTIFICATION TO ECOLOGY

Ecology shall be notified within 30 days of receipt of laboratory analytical results indicating that one or more COCs were detected in groundwater at concentrations exceeding applicable MTCA cleanup levels.

PERIODIC MONITORING OF THE CAP

COCs exceeded the preliminary screening levels for the direct contact and/or the protection of terrestrial receptors in multiple areas of the Property following the completed remedial actions. However, the screening level exceedances are either deeper than 6 feet below ground surface or completely covered by the newly constructed apartment buildings and associated paved parking lots (Figure 2).

To ensure the integrity of the completed remedial actions, periodic monitoring of the asphalt-paved parking lot and vegetated areas outside the footprints of the newly constructed buildings will be conducted for the foreseeable future. This section summarizes the periodic monitoring activities.



MONITORING FREQUENCY

Monitoring will be conducted annually for at least 5 years, beginning immediately after recordation of the environmental covenant, until the first 5-year periodic review by Ecology, which is anticipated to be in 2028.

REPORTING

A 5-Year Periodic Monitoring Report will be submitted to Ecology prior to the 5-year periodic review. Following the 5-year periodic review, periodic monitoring will continue annually unless written approval of a reduction in frequency is received from Ecology. Inspections will be conducted by an Operations and Maintenance Professional (O&M Professional) under the direction of the Project Coordinator. The O&M Professional is Suzanne Stumpf of Farallon and the Project Coordinator is Pete Kingston of Farallon.

INSPECTION PROCEDURES

The inspection will consist of a walking survey of the exterior portion of the Property in areas where COCs exceeded the preliminary screening levels for direct contact and/or the protection of terrestrial receptors. The inspection will be documented on the Periodic Monitoring Form (Attachment A). If any of the following features are present, that feature will be noted on the Periodic Monitoring Form and in photographs:

- Cracking or ruts;
- Intersecting cracks;
- Spalling of surface;
- Buckling;
- Vegetation in cracks;
- Erosion damage;
- Excessive or uneven settlement;
- Distressed vegetation; and
- Animal burrowing.

The Periodic Monitoring Form may include sketches and photographs to further document the inspection and will include a summary of repairs recommended and implemented.



If the O&M Professional is of the opinion that the cap is not performing as intended, appropriate repairs will be recommended and documented. Upon approval of the Project Coordinator, repairs will be implemented by personnel and/or subcontractor(s) qualified to make the repairs as determined by the Project Coordinator.

For the asphalt-paved parking lot, areas with numerous intersecting cracks, alligatored areas, or buckling will be regarded as deterioration requiring maintenance. Cracks will be repaired and conform to current Washington State Department of Transportation Standard Specifications 5-03.3. Alligatored areas greater than 100 square feet will be removed and replaced with 3 inches of new asphalt; areas smaller than 100 square feet may be repaired as cracks. Buckling of the asphalt cap with cracks will be regarded as requiring maintenance and that section of asphalt will be removed and replaced.

For the vegetated areas, areas with animal burrowing or distressed vegetation will be evaluated to determine a mitigation plan. Mitigation measures will be implemented to discourage animal burrowing, if necessary.

Inspection observations will be documented on the Periodic Monitoring Form. If a breach in the integrity of the asphalt cap is identified, the Project Coordinator will notify Ecology and promptly initiate repairs.

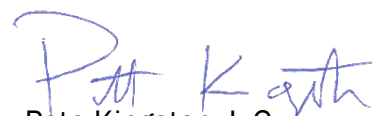
CLOSING

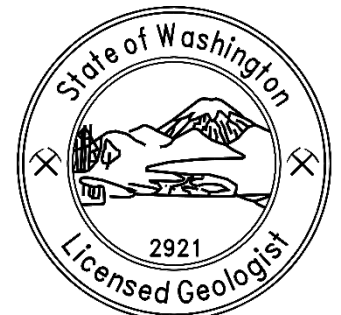
Farallon appreciates the opportunity to provide environmental consulting services for this project. Please contact Pete Kingston at (425) 295-0800 if you have questions or need additional information.

Sincerely,

Farallon Consulting, L.L.C.


Glenn McKenney
Project Geologist


Pete Kingston, L.G.
Principal Geologist



Peter J. Kingston

Attachments: Figure 1, *Property Vicinity Map*
Figure 2, *Property Plan*
Figure 3, *Compliance Monitoring Well Network*
Attachment A, *Periodic Monitoring Form*



cc: Rebecca Ralston, River's Edge WA LLLP
Alexandra Kleeman, Hillis Clark Martin & Peterson P.S.

GM/PK:mbg

LIMITATIONS

The conclusions contained in this report/assessment are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location. The conclusions contained herein are subject to the following inherent limitations:

- **Accuracy of Information.** Farallon reviewed certain information used in this report/assessment from sources that were believed to be reliable. Farallon's conclusions, opinions, and recommendations are based in part on such information. Farallon's services did not include verification of its accuracy. Should the information upon which Farallon relied prove to be inaccurate, Farallon may revise its conclusions, opinions, and/or recommendations.
- **Reconnaissance and/or Characterization.** Farallon performed a reconnaissance and/or characterization of the Site that is the subject of this report/assessment to document current conditions. Farallon focused on areas deemed more likely to exhibit hazardous materials conditions. Contamination may exist in other areas of the Site that were not investigated or were inaccessible. Site activities beyond Farallon's control could change at any time after the completion of this report/assessment.

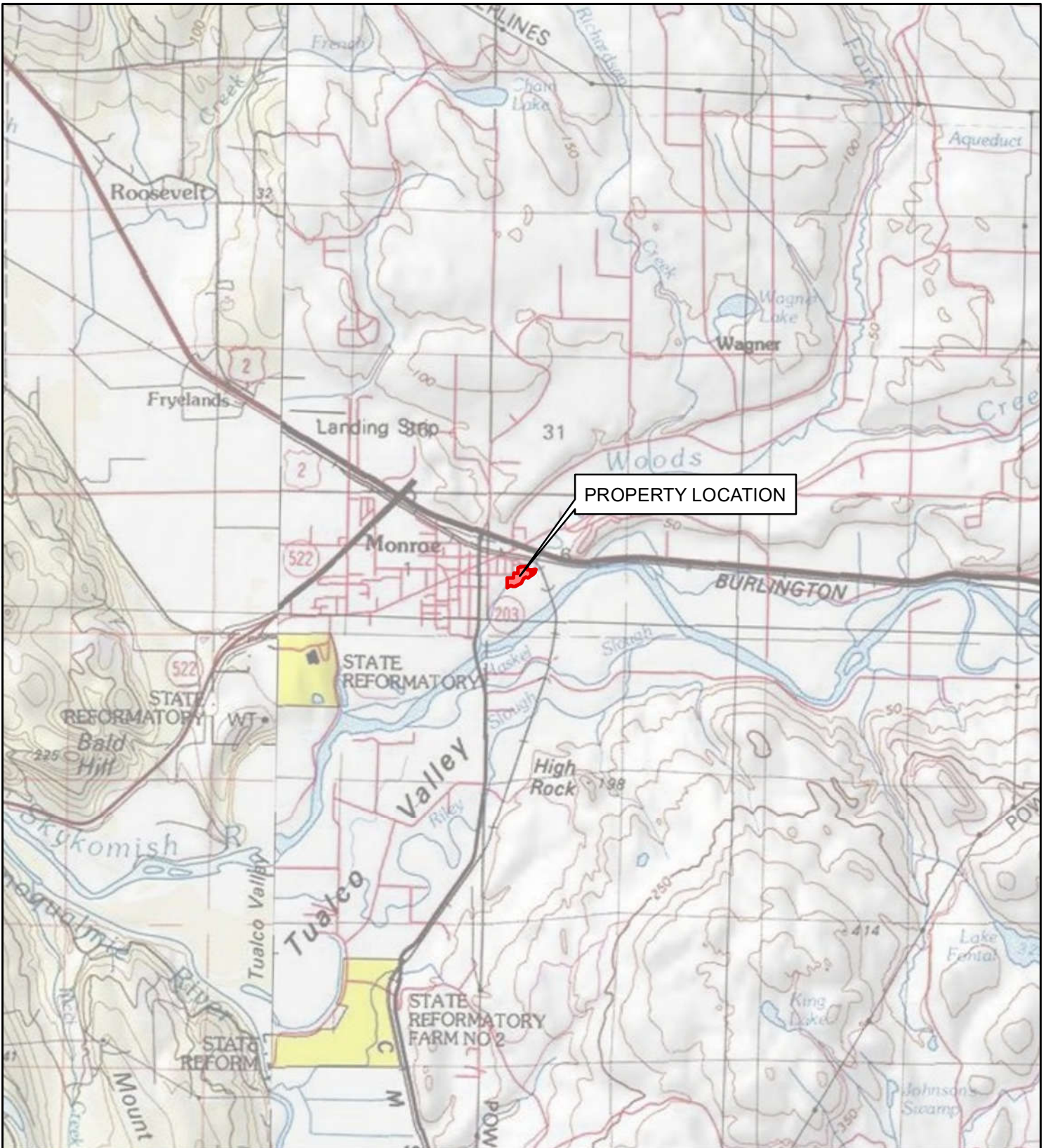
Farallon does not guarantee that the Site is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future. Farallon's observations, findings, and opinions are as of the date of the report.

This report/assessment has been prepared in accordance with the contract for services between Farallon and River's Edge WA LLLP. No other warranties, representations, or certifications are made.

FIGURES

COMPLIANCE MONITORING PLAN
Monroe Auto Salvage
500 East Fremont Street
Monroe, Washington

Farallon PN: 2747-001



REFERENCE: 7.5 MINUTE USGS QUADRANGLE MONROE, WASHINGTON, DATED 2013




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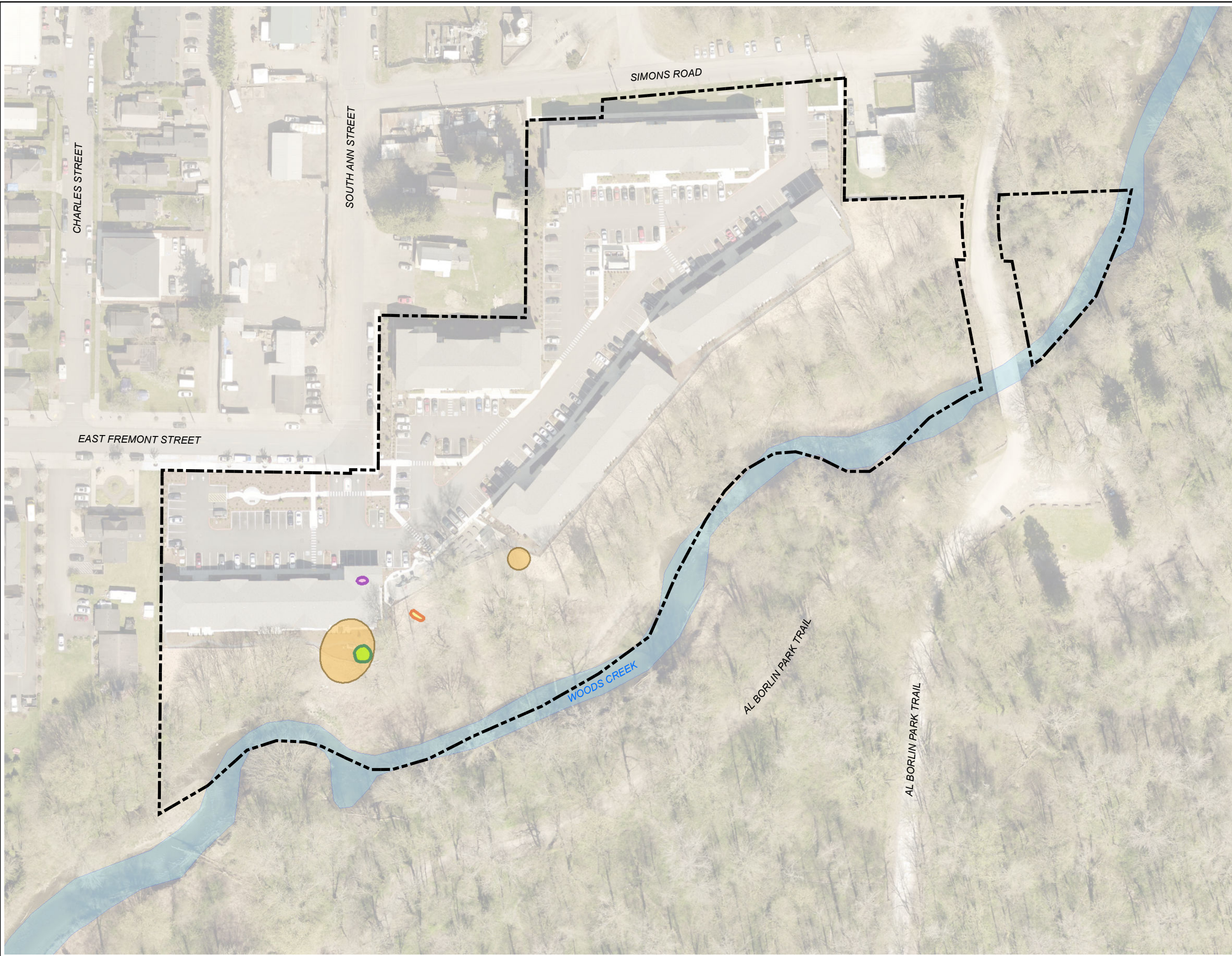
Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Baker City

California
Oakland | Irvine

FIGURE 1
PROPERTY VICINITY MAP
500 EAST FREMONT STREET
MONROE, WASHINGTON

FARALLON PN: 2747-001



- LEGEND**
- ESTIMATED EXTENT OF CADMIUM AND LEAD-IMPACTED SOIL
 - ESTIMATED EXTENT OF LEAD-IMPACTED SOIL
 - ESTIMATED EXTENT OF TPH-IMPACTED SOIL
 - ESTIMATED EXTENT OF ORO-IMPACTED GROUNDWATER
 - PROPERTY BOUNDARY

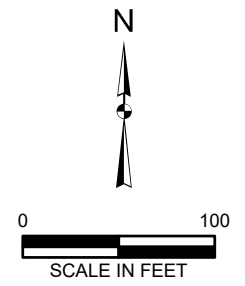


FIGURE 2
PROPERTY PLAN
500 EAST FREMONT STREET
MONROE, WASHINGTON
FARALLON PN: 2747-001



Washington
Issaquah | Bellingham | Seattle

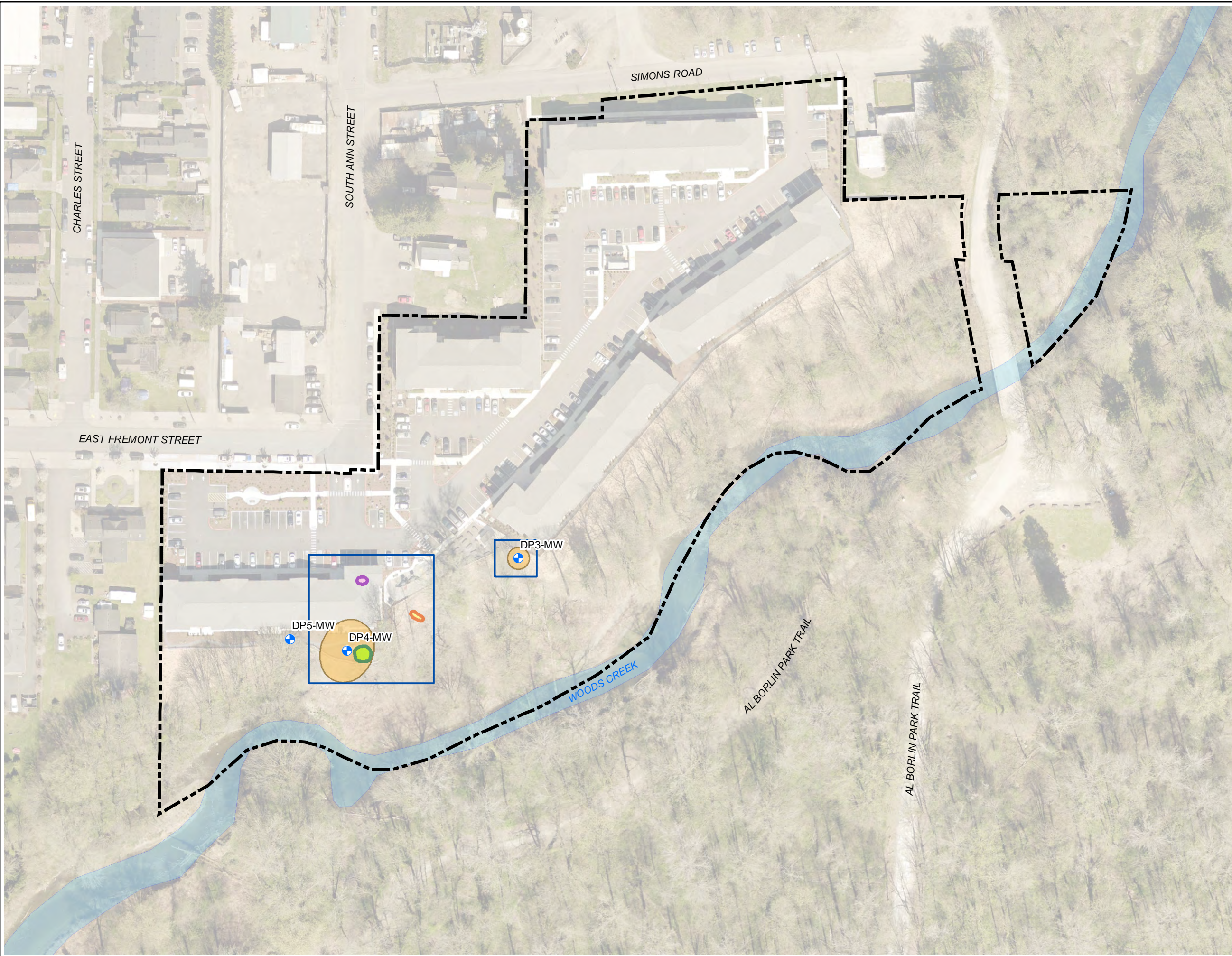
Oregon
Portland | Baker City

California
Oakland | Irvine

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Drawn By: aguse Checked By: GM Date: 7/26/2023

Q:\Projects\2747 River's Edge WALLP\001 Former Monroe Auto Wrecking\Mapfiles\003Figure-02_PropertyPlan.mxd



- LEGEND**
- COMPLIANCE MONITORING WELL (LANDAU, 2019)
 - CAP INSPECTION AREA
 - ESTIMATED EXTENT OF CADMIUM AND LEAD-IMPACTED SOIL
 - ESTIMATED EXTENT OF LEAD-IMPACTED SOIL
 - ESTIMATED EXTENT OF TPH-IMPACTED SOIL
 - ESTIMATED EXTENT OF ORO-IMPACTED GROUNDWATER
 - PROPERTY BOUNDARY

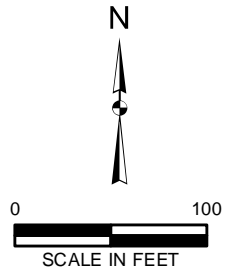


FIGURE 3
COMPLIANCE MONITORING WELL NETWORK
500 EAST FREMONT STREET
MONROE, WASHINGTON
 FARALLON PN: 2747-001

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Drawn By: jjones Checked By: GM Date: 11/20/2023

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**ATTACHMENT A
PERIODIC MONITORING FORM**

COMPLIANCE MONITORING PLAN
Monroe Auto Salvage
500 East Fremont Street
Monroe, Washington

Farallon PN: 2747-001



PERIODIC MONITORING FORM

Preparer's Name: _____ Date/Time Prepared: _____
Site Name: _____ Farallon PN: _____

Site Information

Tenant/Facility

Manager: _____ Interviewed: Yes No

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Phone No.: _____ Email: _____

Current Land Use (Check appropriate boxes)

Residential Commercial (office) Commercial (warehouse) Strip Mall Industrial

Other, Describe: _____

Cap Material (Check all appropriate boxes that apply)

Earthen/Soil Asphalt Concrete Other, Describe: _____

Inspection Scope:

To ensure the integrity of the completed remedial actions, periodic monitoring of the asphalt-paved parking lot and vegetated areas outside the footprints of the newly constructed buildings will be conducted for the foreseeable future. The inspection will consist of a walking survey of the exterior portion of the Property in areas where COCs exceeded the preliminary screening levels for direct contact and/or the protection of terrestrial receptors.

Visual Inspection

Using the attached checklist, inspect the paved parking lot and vegetated areas outside the footprints of the newly constructed buildings. Summarize the results of the visual inspection below:



Site Inspection Sketch

In the area below, provide an appropriate sketch(s) indicating areas inspected and locations of problem areas with recommended repairs. Include additional pages and photographs of areas as appropriate.

General Comments

Provide any other information that may be of importance in understanding the recommendations for annual cap maintenance activities for the Site.



VISUAL INSPECTION CHECKLIST

ASPHALTIC OR CONCRETE CAPPED AREAS

Open cracks and/or ruts	None _____	Repair Needed _____
Differential settlement	None _____	Repair Needed _____
Spalling of surface	None _____	Repair Needed _____
Buckling	None _____	Repair Needed _____
Vegetation in cracks	None _____	Repair Needed _____

VEGETATED AREAS

Erosion damage	None _____	Repair Needed _____
Excessive or uneven settlement	None _____	Repair Needed _____
Distressed vegetation	None _____	Repair Needed _____
Animal burrowing	None _____	Repair Needed _____

Recommended Repair Type/Location: