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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

November 27, 2024

Mike Raskin
MJR Development
6725 116th Avenue NE, Suite 100
Kirkland, Washington 98033
(mike@mjrdevelopment.com)

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

Site name: Meeker Cleaners
Site address: 1317 West Meeker Street, Kent, Washington 98032
Facility/Site ID: 87719977
Cleanup Site ID: 1177
VCP Project No.: NW3168

Dear Mike Raskin:

The Washington State Department of Ecology (Ecology) received your request for an opinion on the Site boundary at the Meeker Cleaners facility (Site) under the Voluntary Cleanup Program (VCP). This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#) RCW.¹

Issue Presented and Opinion

Pursuant to data presented in the *Environmental Chemists letter report* provided by Friedman & Bruya, Inc., is the Site's western boundary delineated?

YES. Ecology has determined that the western boundary of the Site is fully delineated. The Site does not extend to the west-adjacent parcel.

¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

Site Description

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:

- Diesel- and heavy oil-range petroleum hydrocarbons (TPH-D and TPH-O), tetrachloroethene (PCE), and trichloroethene (TCE) into the Soil.
- TPH-D, TPH-O, and vinyl chloride (VC) into the Groundwater.

Enclosure A includes a Site description, history, and diagrams.

Please note that a parcel of real property can be affected by multiple sites. The Site is located on King County parcel 5436200526 (Property). Meeker Gas Station Former facility (facility ID 44681713) is also located on the Property, approximately 170 feet east of the Site. The Meeker Gas Station Former facility is managed separately under VCP project number NW3167. Based on current data, the Meeker Gas Station Former facility does not affect, and is not affected by, the Site. This opinion does not apply to any contamination associated with the Meeker Gas Station Former facility.

Basis for the Opinion

Ecology bases this opinion on the information contained in the documents listed in Enclosure B.

You can request these documents by filing a [records request](#).² For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check if the documents are available on the [Site webpage](#).³

This opinion is void if information in any of the listed documents is materially false or misleading.

Analysis and Opinion

Based on a review of the *Environmental Chemists letter report* prepared by Friedman & Bruya, Inc., dated October 15, 2024, Ecology has determined that the western boundary of the Site is fully delineated. This determination is based on the following:

- In Ecology's *Opinion Letter* dated May 5, 2020, Ecology noted that a soil sample collected on the west sidewall of the remedial excavation in 2017 (C7-WSW-1:3) exceeded the MTCA Method A soil cleanup level (see Enclosure A, Figure 6). This sample was reported to contain a TPH-D concentration of 110 milligrams per kilogram (mg/kg) and a TPH-O concentration of 2,000 mg/kg. The sum of the TPH-D and TPH-O concentration is above the MTCA Method A soil cleanup level of 2,000 mg/kg.

² <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

³ <https://apps.ecology.wa.gov/cleanupsearch/site/1177>

- The *Environmental Chemists letter report* provided the chromatogram of sample C7-WSW-1:3. The chromatogram indicates that there is no middle distillate product (diesel or heating oil) in the sample. The reported TPH-D concentration in the sample was marked with an “x” qualifier, because it was caused by elevated TPH-O concentration eluting in neighboring TPH-D reporting range.
- After reviewing the chromatogram, Ecology concurs that adding the reported TPH-D concentration will cause double counting or high bias of the total NWTPH-Dx result. Therefore, the TPH-D + TPH-O concentration in this sample should be 2,000 mg/kg.
- In this case, the west sidewall sample C7-WSW-1:3 does not exceed the MTCA Method A soil cleanup level. The western extent for soil contamination is delineated.
- Groundwater samples collected from monitoring well MW-3, located on the southwest corner of the Property, have been below MTCA Method A groundwater cleanup level for TPH-D and TPH-O and volatile organic compounds (VOCs) for four consecutive quarters in 2018. The western extent for groundwater contamination is also delineated.
- The western boundary of the Site is confined within the Property (King County parcel 5436200526). The Site does not extend to the west-adjacent parcel 5436200524.
- However, the southern extent of the Site is not fully delineated. The Site may extend to the south on the City of Kent right-of-way (West Meeker Street).

Limitations of the Opinion

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](https://leg.wa.gov/RCW/default.aspx?cite=70A.305.040)(4).⁴

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

⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW [70A.305.080](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080)⁵ and WAC [173-340-545](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545).⁶

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](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170)(6).⁷

Contact Information

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. If you have any questions about this opinion, please contact me at 425-229-2565 or jing.song@ecy.wa.gov.

Sincerely,



Jing Song
Site Manager
Toxics Cleanup Program, NWRO

Enclosures (2): A – Site Description, History, and Diagrams
 B – Basis for the Opinion: List of Documents

cc: Eric Koltes, J.S. Held LLC, (Eric.Koltes@jsheld.com)
 NWRO VCP Coordinator, (vcp-nwro@ecy.wa.gov)

⁵ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

⁶ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

⁷ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

Enclosure A

Site Description, History, and Diagrams

Site Description

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

Site

The Site is defined by the nature and extent of the following releases on the northwest corner of the intersection of Washington Avenue North and West Meeker Street in Kent, Washington (**Figure 1**):

- TPH-D, TPH-O, PCE, and TCE released to soil.
- TPH-D, TPH-O, and VC released to groundwater.

The Site is located on a 1.88-acre King County parcel 5436200526 (Property, **Figure 2**). Based on current data, the Site is located on the southwest corner of the Property and may extend to the south on the City of Kent right-of-way (West Meeker Street). Currently the southern extent of the Site boundary is not fully defined.

Area and Property Description

The Property is part of Meeker Square shopping center. The Meeker Square shopping center includes a 9.6-acre area, consisting of the Property and a west-adjacent 7.95-acre King County parcel 5436200524 (**Figure 2**). The shopping center is currently developed with a department store (Big Lots), a pharmacy (Rite Aid), a dry cleaner (Meeker Cleaners), a self-serve garage, multiple restaurants (Ichi Teriyaki, Jimmy Johns, Egghole, and Emerald City Smoothie), and offices of the Washington Department of Social and Health Services.

The Property is located within a commercial area in Kent. The Property is bounded to the east by Washington Avenue North and Crossgate Shopping Center. The Property is bounded to the south by West Meeker Street. A Chevron-branded service station, and a few fast-food restaurants (McDonald's, Burger King, and Taco Bell) are located further south. The Property is bounded to the north by West Smith Street, with multiple office buildings beyond. The Property is bounded to the west by the rest of the Meeker Square shopping center (parcel 5436200524), with apartment buildings and a church beyond.

Meeker Gas Station Former facility (facility ID 44681713) is also located on Property and is approximately 170 feet east of the Site. Cleanup of the Meeker Gas Station Former facility is managed separately under VCP project NW3167. Based on current data, the Meeker Gas Station Former facility does not affect, and is not affected by, the Site.

Property History and Current Use

The Property was developed as part of the Meeker Square shopping center in 1966. An additional two-tenant commercial building was completed in 1991 on the southwestern portion of the Property, where a former dry cleaners (Meeker Cleaners) operated from 1991 through the end of 1999 (**Figure 3**). The historic street address associated with the former dry cleaners was 1317 West Meeker Street, Suite H-1.

In 2000, dry cleaning operations stopped, the building was demolished, and the dry cleaner business was moved to 1313 West Meeker Street on the west-adjacent parcel (**Figure 2**). The current Meeker Cleaners operates as an active “drop stop” with no dry-cleaning operation ever taking place. The portion of the Property where the former Meeker Cleaners was located has been used for parking since approximately 2000 (**Figure 3**).

Sources of Contamination

Two sets of contaminants of concern (COCs) are present at the Site:

- Halogenated volatile organic compounds (HVOCs) including PCE, TCE, and VC. The HVOC contamination was initially discovered in 1996. The contamination is associated with the former dry-cleaning operations at the Site.
- Petroleum hydrocarbons including TPH-D and TPH-O. The petroleum hydrocarbon contamination was initially discovered in 2014. The source of the petroleum hydrocarbon contamination is unknown.

Physiographic Setting

The Site is located in the Puget Sound Lowlands physiographic province, a broad north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. The Site is situated at an elevation of approximately 40 feet above mean sea level within the Green River Valley, a major regional drainage system that extends northward to discharge into Puget Sound. The land surface in the immediate vicinity of the Site is relatively flat.

Surface/Storm Water System

The nearest surface water body is the Green River, located approximately 1,900 feet (0.35 miles) south of the Property. Surface water runoff on the Property is directed to catch basins across the Property, and along the southern and eastern Property boundaries on West Meeker Street and Washington Avenue North.

Ecological Setting

The area surrounding the Property is zoned for commercial uses. Land surfaces on the Property and adjacent properties are primarily covered by buildings and asphalt or concrete pavement with landscaped areas. The Site qualifies for an exclusion from further terrestrial ecological evaluation (TEE) per WAC 173-340-7491(1)(c). There are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of any area of the Site.

Geology

The Site is located within the Green River Valley, which is a low-lying valley filled with recent alluvium near the surface. Based on [Geological Map of Washington State](#),¹ surficial soil at the Site is dominated by Quaternary alluvium (Qa). Alluvial deposits typically consist of interbedded silts, sands, and gravels.

Subsurface soils encountered at the Site include gravelly sand fill material to approximately 1 to 2 feet below ground surface (bgs), followed by silty sand, poorly graded sand with varying amounts of silt, and silt with varying amounts of sand and gravels, to the maximum explored depth of 20 feet bgs. Soils beneath West Meeker Street consist of silty sand to approximately 6 feet bgs, underlain by sandy silt to the maximum explored depth of 15 feet bgs.

Groundwater

Shallow groundwater occurs at depths ranging from approximately 4 to 5 feet bgs, and flows to the south-southwest, with a component to the east (**Figure 4**).

A total of 11 groundwater monitoring wells have been installed at the Site. Eight monitoring wells (MW1 through MW6, DP2, and DP5) were installed prior to 2003 (**Figure 3**). Among them, monitoring wells MW3 through MW6 were decommissioned in 2017. The other four monitoring wells (MW1, MW2, DP2 and DP5) appeared to be paved over or destroyed.

In July 2017, three monitoring wells (MW-1 through MW-3) were installed to a total depth of 15 feet bgs, and screened from 5 to 15 feet bgs (MW-1) or 3 to 13 feet bgs (MW-2 and MW-3). These monitoring wells are still active (**Figure 2**).

Water Supply

Drinking water for the area is supplied by the City of Kent. The City of Kent obtains drinking water from upland springs and wells located east of the Site on the Kent East Hill and from wells located in the Green River Valley north of the Site. The City of Kent also purchases water from City of Tacoma, which is sourced from the Green River watershed. None of these water

¹ <https://ngmdb.usgs.gov/Info/dmt/docs/schuster07b.pdf>

supply sources are located within a 1-mile radius of the Property. The Property is also located outside of the 10-year time of travel wellhead protection area of all water supply wells.

According to Ecology's *Well Report* database, there are no water supply wells located within a 0.5-mile radius of the Property. The distance to the closest 10-year wellhead protection area (for East Hill Well 1) is approximately 1.2 miles east of the Property.

Release and Extent of Contamination

Environmental Site investigations and interim remedial activities have been conducted at the Site since 1996.

Pre-interim action investigations

From December 1996 to April 2000, a total of 25 soil samples were collected from 0.5 to 10 feet bgs from 20 locations (1 through 4, SS-1 through SS-4, B-3, B-4, DP1, DP3, DP4, and DP6 through DP12, **Figure 4**). PCE and/or TCE concentrations exceeded the MTCA Method A soil cleanup levels to approximately 10 feet bgs at following locations: 3, B-3, B-4, SS-2, DP9/SS-3, DP4/SS-4, DP1, DP3, DP6, DP7, DP10 through DP12. In addition, groundwater samples collected from DP4, DP7, DP9, and DP11 contained PCE and/or TCE concentrations above the MTCA Method A groundwater cleanup levels.

2002 interim action

Approximately 1,500 tons of PCE-contaminated soil were excavated and removed from the Site. Excavation was completed to a depth of 6 feet bgs, with slightly greater depths along the southern boundary and on the southeastern portion of the excavation (**Figure 4**). A total of 38 soil samples were collected between 2 and 7 feet bgs. Two soil samples collected from the bottom of the eastern portion of the excavation contained PCE and/or TCE concentrations above the MTCA Method A soil cleanup levels: C10-5' at 5 feet bgs and E10-5.5' at 5.5 feet bgs.

2014 and 2015 additional investigations

Three former monitoring wells (MW1 through MW3) were sampled in August 2014 (**Figure 3**). The TPH-D + TPH-O concentrations exceeded the MTCA Method A groundwater cleanup level in wells MW1 and MW2; VC concentrations exceeded the MTCA Method A groundwater cleanup level in wells MW2 and MW3.

A total of 77 soil samples were collected between 2 and 15 feet bgs from 25 soil borings (B-11 through B-35) in 2015 (**Figure 5**). The TPH-D + TPH-O concentrations exceeded the MTCA Method A soil cleanup level at depths between 2 and 5 feet bgs at B-13, B-15, B-16, B-24, B-26, B-28, B-32, and B-34. The TPH-D + TPH-O concentrations exceeded the MTCA Method A groundwater cleanup level in soil borings B-15, B-16, and B-17. In addition, PCE exceeded the MTCA Method A soil cleanup level at 5 feet bgs at soil boring B-13. VC concentrations exceeded

the MTCA Method A groundwater cleanup level in reconnaissance groundwater samples collected from soil borings B-15 and B-17.

2017 interim action

A total of 2,169.33 tons of petroleum-contaminated soil was removed from the Site in February and March 2017 (**Figure 6**). The excavation extended up to 5.5 feet bgs. Among a total of 38 confirmation soil samples, TPH-D + TPH-O concentrations exceeded the MTCA Method A soil cleanup level in two soil samples from the south sidewall (B17-SSW-1:3.5 and B13-SSW-1:2).

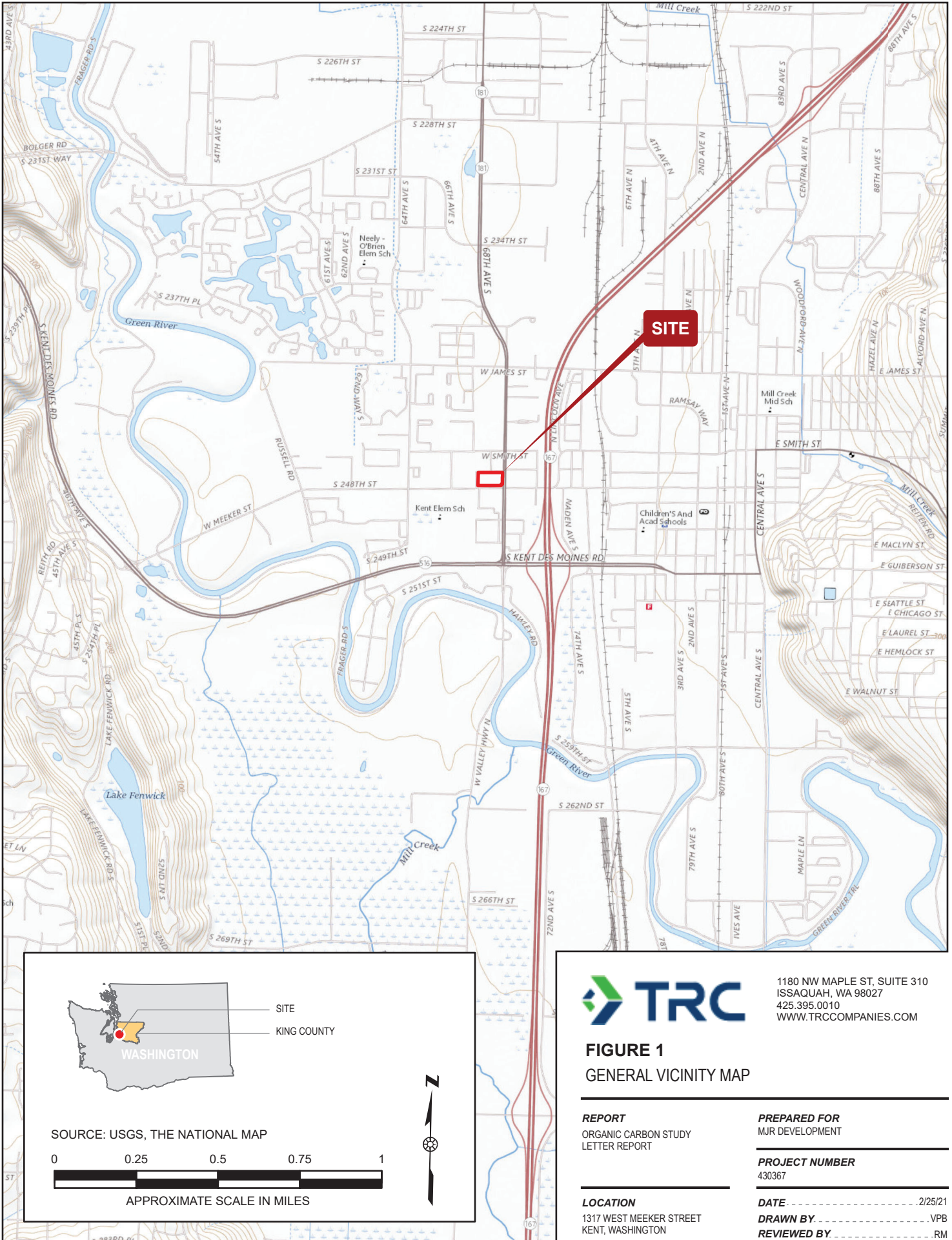
An additional 25.23 tons of PCE-contaminated soil were removed from two small areas at the Site (**Figure 7**). The excavations extended to approximately 6 feet bgs. All confirmation soil samples contained HVOC concentrations below the MTCA Method A soil cleanup levels.

Post-interim action monitoring

Three monitoring wells (MW-1 through MW-3) were installed at the Site in July 2017 (**Figure 2**). As of October 2018, HVOC concentrations have been below the MTCA Method A groundwater cleanup levels for four consecutive quarters in all three monitoring wells. However, TPH-D + TPH-O concentrations were still above the MTCA Method A groundwater cleanup level in monitoring wells MW-1 and MW-2.

Site Diagrams

Enclosure A: Figure 1



Enclosur A: Figure 2



1180 NW MAPLE ST, SUITE 310
ISSAQUAH, WA 98027
425.395.0010
WWW.TRCCOMPANIES.COM

FIGURE 2 SITE REPRESENTATION

REPORT
ORGANIC CARBON STUDY
LETTER REPORT

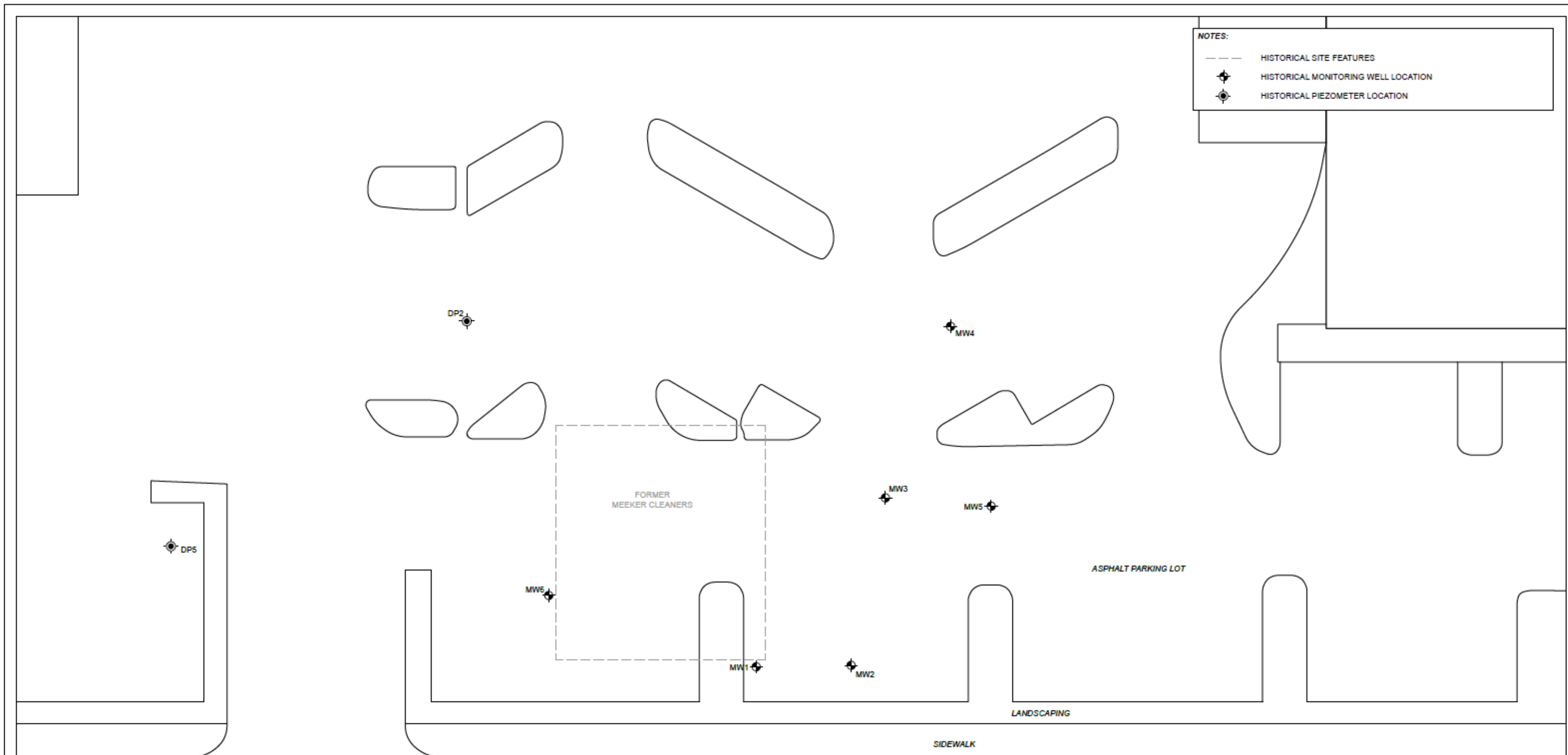
PREPARED FOR
MJR DEVELOPMENT

PROJECT NUMBER
430367

LOCATION
1317 WEST MEEKER STREET
KENT, WASHINGTON

DATE 2/25/21
DRAWN BY VPB
REVIEWED BY RM

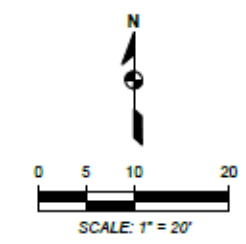
Enclosure A: Figure 3



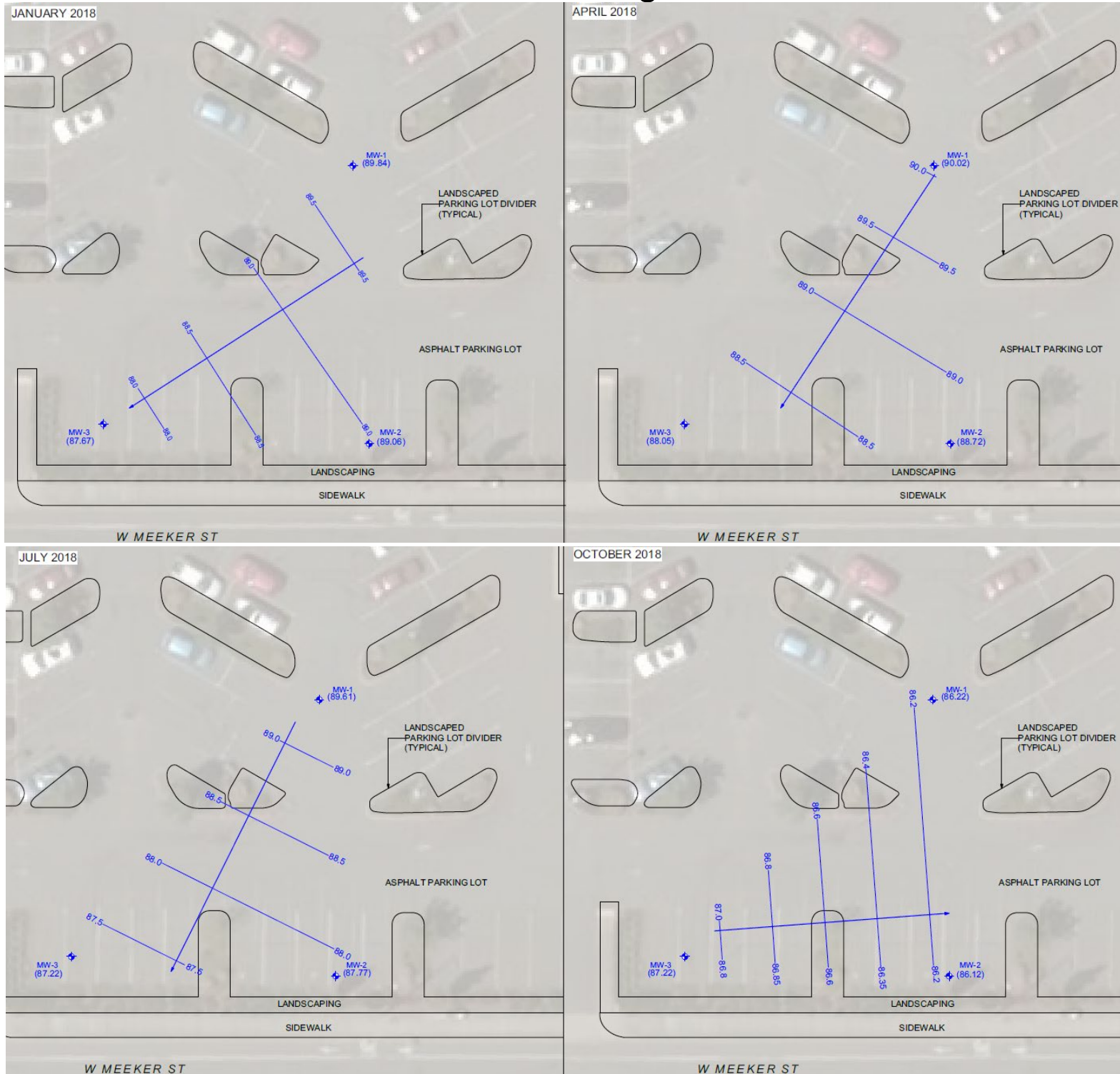
NOTES:

---	HISTORICAL SITE FEATURES
⊕	HISTORICAL MONITORING WELL LOCATION
⊙	HISTORICAL PIEZOMETER LOCATION

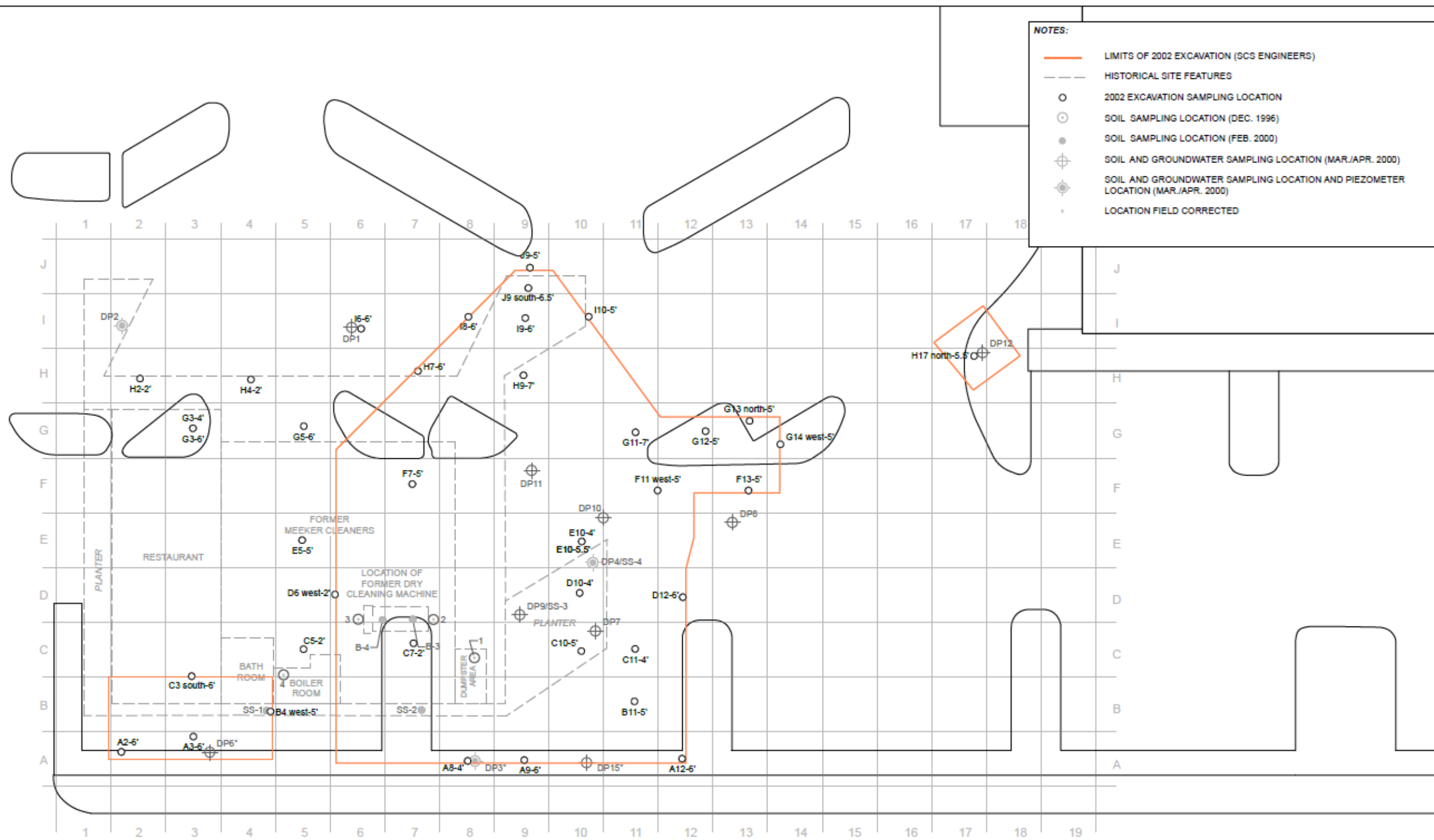
FIGURE 7 HISTORICAL MONITORING WELL LOCATIONS			
PREPARED BY			
REPORT	REMEDIAL INVESTIGATION, FEASIBILITY STUDY, AND CLEANUP ACTION PLAN		
LOCATION	FORMER MEEKER CLEANERS SITE 1301 WEST MEEKER STREET, KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
8/31/17	AM	EMK	65112.4



Enclosure A: Figure 4



Enclosure A: Figure 5

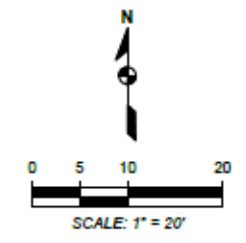


NOTES:

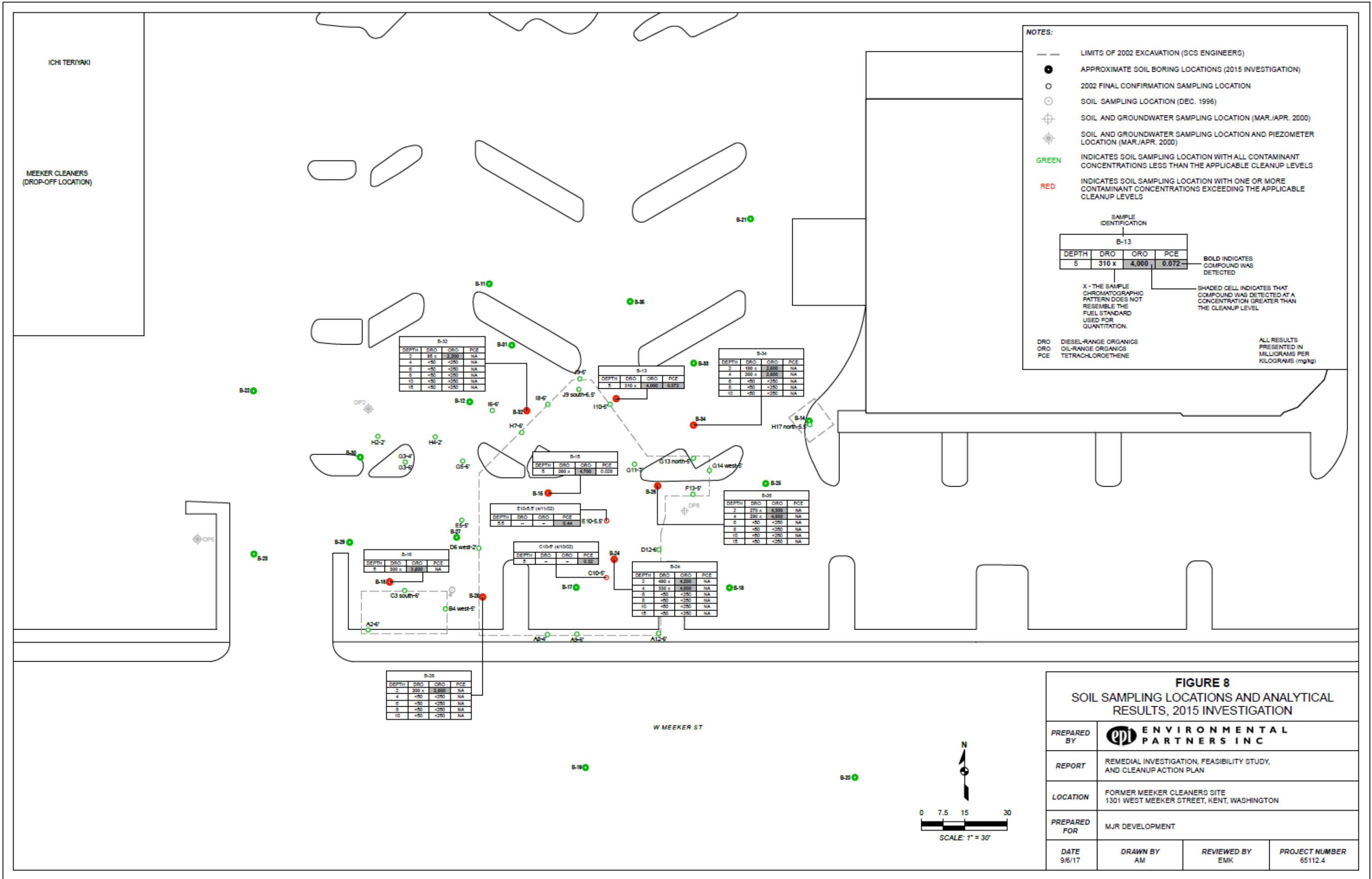
- LIMITS OF 2002 EXCAVATION (SCS ENGINEERS)
- - - HISTORICAL SITE FEATURES
- 2002 EXCAVATION SAMPLING LOCATION
- SOIL SAMPLING LOCATION (DEC. 1996)
- SOIL SAMPLING LOCATION (FEB. 2000)
- ⊕ SOIL AND GROUNDWATER SAMPLING LOCATION (MAR./APR. 2000)
- ⊕ SOIL AND GROUNDWATER SAMPLING LOCATION AND PIEZOMETER LOCATION (MAR./APR. 2000)
- *

FIGURE 5			
2002 REMEDIAL EXCAVATION SAMPLING LOCATIONS			
PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	REMEDIAL INVESTIGATION, FEASIBILITY STUDY, AND CLEANUP ACTION PLAN		
LOCATION	FORMER MEEKER CLEANERS SITE 1301 WEST MEEKER STREET, KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
9/6/17	AM	EMK	65112.4

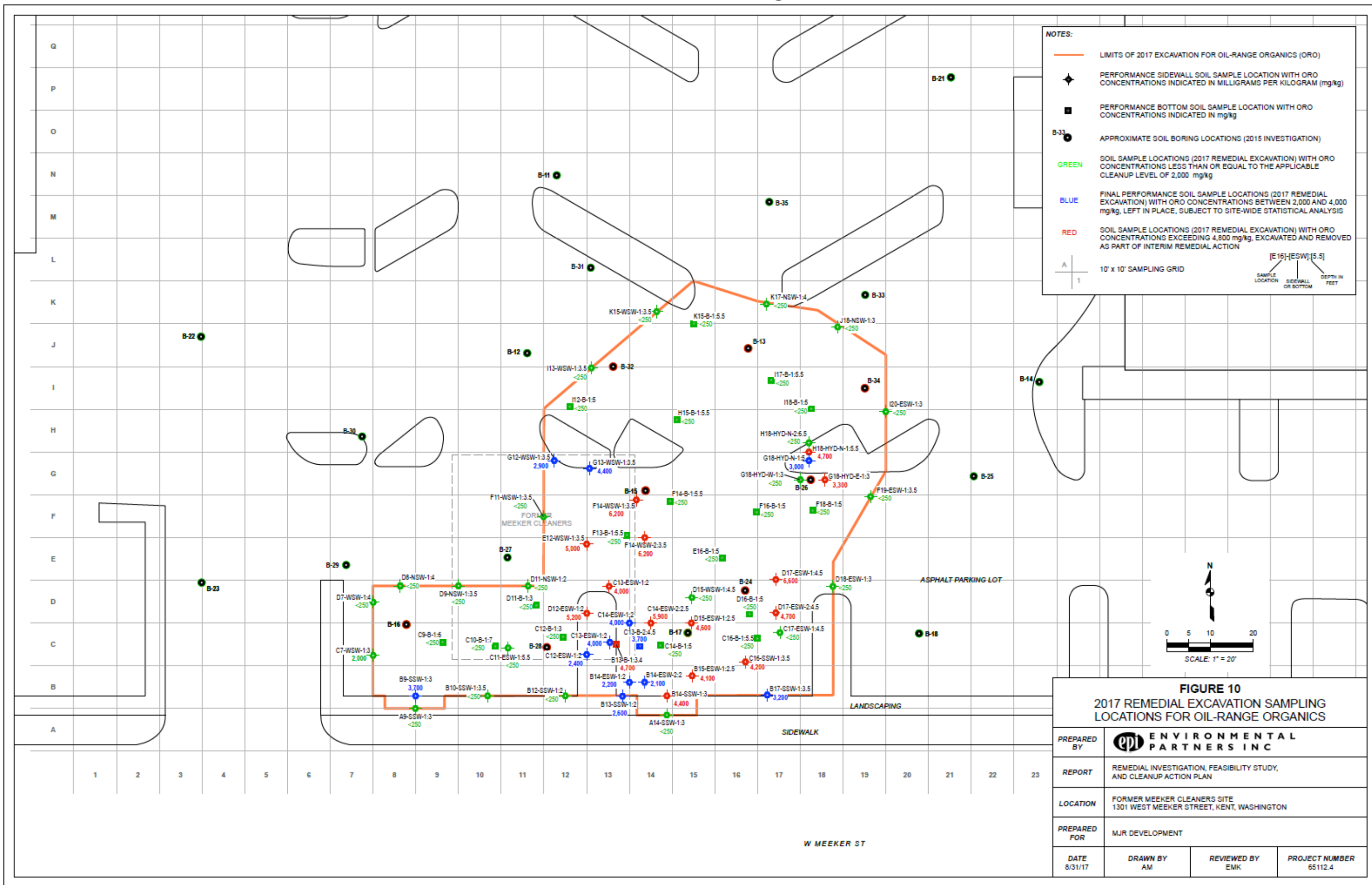
W MEEKER ST



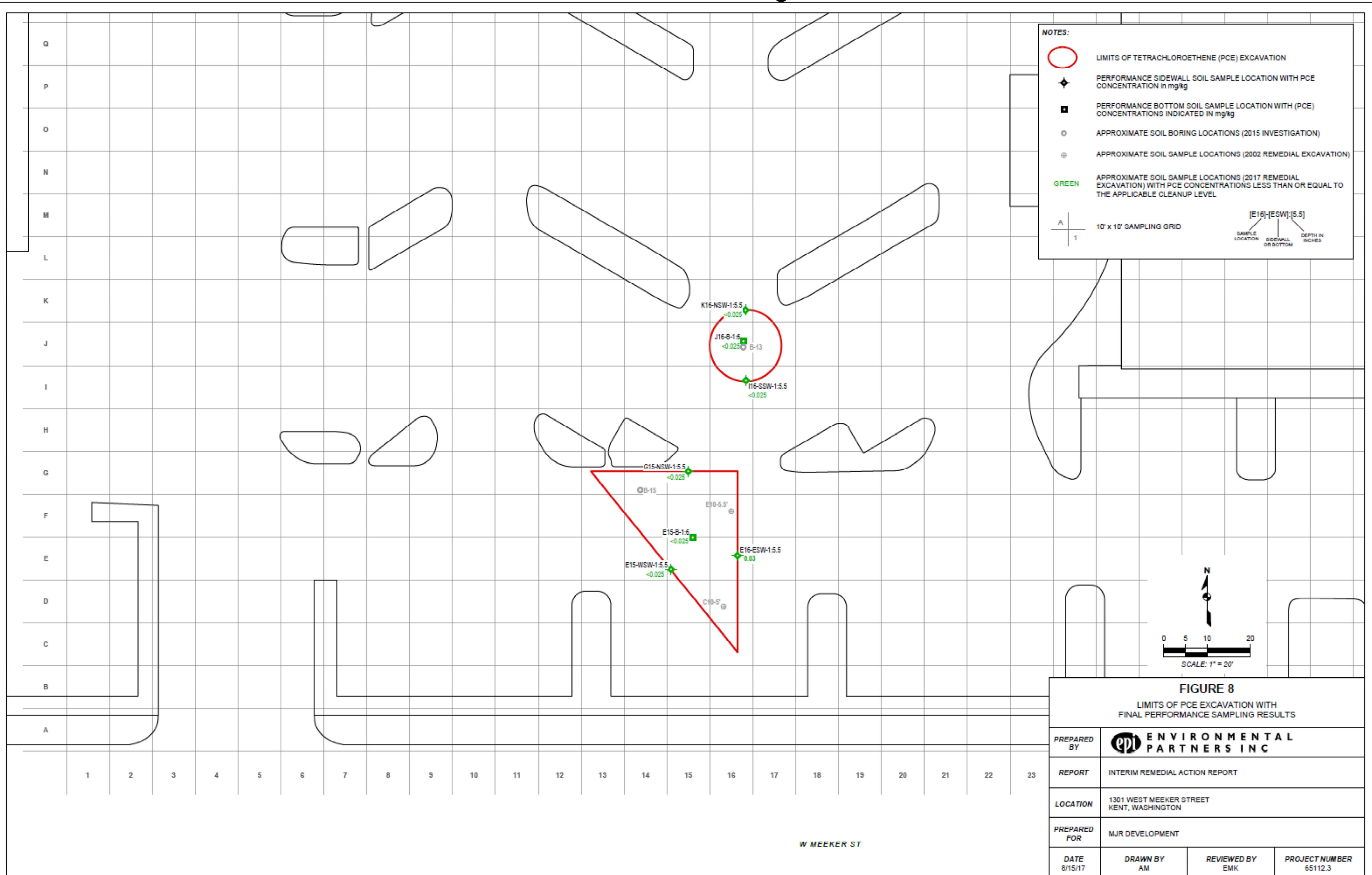
Enclosure A: Figure 6



Enclosure A: Figure 7



Enclosure A: Figure 8



NOTES:

- LIMITS OF TETRACHLOROETHENE (PCE) EXCAVATION
- ◆ PERFORMANCE SIDEWALL SOIL SAMPLE LOCATION WITH PCE CONCENTRATION IN mg/kg
- PERFORMANCE BOTTOM SOIL SAMPLE LOCATION WITH (PCE) CONCENTRATIONS INDICATED IN mg/kg
- ⊙ APPROXIMATE SOIL BORING LOCATIONS (2015 INVESTIGATION)
- ⊕ APPROXIMATE SOIL SAMPLE LOCATIONS (2002 REMEDIAL EXCAVATION)
- GREEN APPROXIMATE SOIL SAMPLE LOCATIONS (2017 REMEDIAL EXCAVATION) WITH PCE CONCENTRATIONS LESS THAN OR EQUAL TO THE APPLICABLE CLEANUP LEVEL

A
1

[E15]-[ESW]-[5.5]
 SAMPLE LOCATION SIDEWALL OR BOTTOM DEPTH IN INCHES

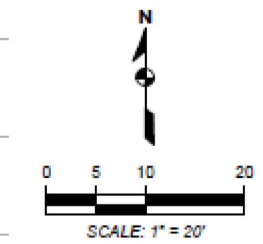


FIGURE 8			
LIMITS OF PCE EXCAVATION WITH FINAL PERFORMANCE SAMPLING RESULTS			
PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	INTERIM REMEDIAL ACTION REPORT		
LOCATION	1301 WEST MEEKER STREET KENT, WASHINGTON		
PREPARED FOR	MJR DEVELOPMENT		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
8/15/17	AM	EMK	65112.3

W MEEKER ST

Enclosure B

Basis for the Opinion: List of Documents

1. Friedman & Bruya, Inc., *Environmental Chemists, letter report*, October 15, 2024.
2. Department of Ecology (Ecology), *Re: Opinion Pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site: Meeker Cleaners, 1317 West Meeker Street, Kent, WA 98032, VCP Project No. NW3168*, August 27, 2001.
3. TRC Environmental Corporation (TRC), *Re: Background Organic Carbon Study, Former Meeker Cleaners Site, 1317 West Meeker, Kent, Washington*, May 4, 2021.
4. Ecology, *Re: Further Action at the following Site: Meeker Cleaners, 1317 West Meeker Street, Kent, WA 98032, VCP Project No. NW3168*, May 5, 2020.
5. Environmental Partners Inc. (EPI), *Groundwater Monitoring Report, Former Meeker Cleaners Site, 1301 West Meeker Street, Kent, Washington*, December 18, 2019.
6. EPI, *Remedial Investigation, Feasibility Study, and Cleanup Action Plan, Former Meeker Cleaners Site, 1301 West Meeker Street, Kent, Washington*, September 6, 2017.
7. EPI, *Interim Remedial Action Report, Former Meeker Cleaners, 1301 West Meeker Street, Kent, King County, Washington*, September 1, 2017.
8. EPI, *Technical Memorandum, Re: Summary of Investigation, Meeker Square Property, 1301 West Meeker Street, Kent, Washington*, February 25, 2016.
9. Migizi Group, Inc., *Memorandum, Meeker Square – 1301 West Meeker, Kent, WA, Re: Groundwater Sampling*, September 8, 2014.
10. SCS, *Voluntary Cleanup Program Soil Remediation Report – Soil Excavation and Disposal, PCE Remediation Project, Former Meeker Cleaners Site, Meeker Square Shopping Center, VCP NW0879*, September 2002.