



Electronic Copy

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

December 9, 2024

Susan Penoyar  
Sound Transit  
401 S Jackson Street  
Seattle, WA 98104  
([susan.penoyar@soundtransit.org](mailto:susan.penoyar@soundtransit.org))

**Re: No Further Action opinion for the following contaminated Site**

Site name: Southgate Oil  
Site address: 23428 Pacific Highway S, Kent, WA 98032  
Facility/Site ID: 84946863  
Cleanup Site ID: 6762  
VCP Project No.: NW3327

Dear Susan Penoyar:

The Washington State Department of Ecology (Ecology) received your request on October 30, 2024 for an opinion regarding the sufficiency of your independent cleanup of the Southgate Oil facility (Site) under the Voluntary Cleanup Program (VCP).<sup>1</sup> 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.<sup>2</sup>

## Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter [173-340](#) WAC<sup>3</sup> (collectively called "MTCA").

---

<sup>1</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

<sup>2</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

## 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 release(s):

- Gasoline, diesel, and heavy oil range petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O), benzene, methylene chloride, tetrachloroethene (PCE), naphthalenes, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), cadmium, lead, and mercury in soil.

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

Please note the parcels of real property associated with this Site are also located within the projected boundaries of the Tacoma Smelter Plume King County facility (Ecology Facility Site ID No. 66948686, Cleanup Site ID No. 2123). Based on Ecology's [Dirt Alert Map](#)<sup>4</sup>, the surface soil at the Site and the vicinity may contain up to 100 milligrams per kilogram (mg/kg) of arsenic. However, the shallow soil samples collected at the Site to date contain arsenic concentrations below the MTCA Method A soil cleanup level of 20 mg/kg. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume King County facility.

## Basis for the Opinion

Ecology bases this opinion on information in the documents listed in Enclosure B. You can request these documents by filing a [records request](#).<sup>5</sup> For help making a request, contact the Public Records Officer at [recordsofficer@ecy.wa.gov](mailto:recordsofficer@ecy.wa.gov) or call (360) 407-6040. Before making a request, check if the documents are available on the [Site webpage](#).<sup>6</sup>

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

## Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

### Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. Enclosure A describes the Site.

---

<sup>4</sup> <https://apps.ecology.wa.gov/dirtalert/?lat=47.273840&lon=-122.500000&zoom=11>

<sup>5</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

<sup>6</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/6762>

Contamination at the Site is associated with operation of a former bulk fuel distribution facility (Southgate Oil) for approximately 75 years. The facility stopped distributing fuel in or around 1999. All former facility structures were demolished by 2020.

Subsurface investigations and remedial actions from 2000 to 2024 sufficiently defined the lateral and vertical extents of the contamination in soil. All contaminated soil was removed to depths ranging from 1.5 to 30 feet below ground surface (bgs) from the Site during multiple remedial excavations in 2019 to 2020.

Groundwater is present at depths below 65 feet below ground surface (bgs), which is at least 35 feet below the deepest soil contamination (at 30 feet bgs). Subsurface soil is primarily comprised of dense silty sand (glacial till), reducing the likelihood of contaminant migration. Sufficient separation is present between the contaminated soil and groundwater. It is Ecology's opinion that groundwater at the Site is not impacted by the contaminated soil.

### **Setting cleanup standards**

Cleanup standards include cleanup levels and points of compliance. Ecology has determined the cleanup levels set for the Site meet the substantive requirements of MTCA.

#### **Soil:**

##### ***Cleanup levels.***

The Site is located in a mixed commercial and light industrial used area, and qualifies for an exclusion from further terrestrial ecological evaluation per [WAC 173-340-7491](https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-7491)<sup>7</sup>. There are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of the Site. Therefore, cleanup levels protective of terrestrial species are not needed at this Site.

MTCA Method A soil cleanup levels for unrestricted land uses are based on protection of groundwater and are the default cleanup levels. These Method A soil cleanup levels are available in [WAC 173-340-900, Table 740-1](https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-900)<sup>8</sup>.

##### ***Point of compliance.***

The soil point of compliance based on protection of groundwater is soils throughout the Site.

#### **Groundwater:**

##### ***Cleanup levels.***

The highest beneficial use for groundwater under MTCA is a drinking water source, unless it can be demonstrated that the groundwater is not potable. MTCA Method A groundwater cleanup levels are

---

<sup>7</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-7491>

<sup>8</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-900>

protective of potable use and are therefore the default. These Method A groundwater cleanup levels are available in [WAC 173-340-900, Table 720-1](#)<sup>9</sup>.

### ***Point of compliance.***

The standard point of compliance for groundwater is throughout the Site, from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected.

## **Selecting the cleanup action**

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The cleanup action consists of removal of former underground storage tanks (USTs) and dispensers, multiple remedial excavations, collection of confirmation soil samples to demonstrate compliance, and boring exploration to confirm the absence of groundwater.

## **Implementing the cleanup action**

Ecology has determined your cleanup meets the standards set for the Site. The cleanup consists of the following:

- 2000: Removal of two fuel dispensers and nine USTs including one 275-gallon, one 550-gallon, one 650-gallon, two 1,000-gallon, two 3,000-gallon, one 5,000-gallon, and one 10,000-gallon USTs that stored gasoline, diesel, and heating oil. Excavation of 550 cubic yards of petroleum-contaminated soil (PCS) from the excavations and remediation of PCS on Site before being used as backfill.
- 2002: Removal of one dispenser and two USTs including one 20,000-gallon and one 25,000-gallon heating oil UST. Excavation of 748 tons of PCS from the excavations and disposal of PCS off-Site.
- 2019-2020: Completion of multiple remedial excavations across the Site and removal of approximately 6,570 tons of contaminated soil for off-Site disposal. The excavated soils were contaminated with petroleum hydrocarbons, volatile organic compounds (VOCs) and/or metals, depending on the location of the excavations. Excavations extended to depths ranging from 1.5 to 30 feet bgs in different areas of the Site.
- 2019-2020: Collection of confirmation soil samples at final excavation limits to demonstrate compliance with MTCA Method A cleanup levels.
- 2024: Advancement of a deep boring to 65 feet bgs to confirm the absence of groundwater and demonstrate groundwater is not impacted by contaminated soil.

---

<sup>9</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-900>

You must decommission [resource protection wells](#)<sup>10</sup> installed as part of the remedial action that are not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC [173-160-460](#).<sup>11</sup>

## **Listing of the Site**

Based on this opinion, Ecology will initiate the process of removing the Site from the Contaminated Sites List and Leaking Underground Storage Tank (LUST) list. The Site will be added to the No Further Action Sites List.

## **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](#)(4).<sup>12</sup>

### **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 opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW [70A.305.080](#)<sup>13</sup> and WAC [173-340-545](#).<sup>14</sup>

### **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](#)(6).<sup>15</sup>

---

<sup>10</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410>

<sup>11</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

<sup>12</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

<sup>13</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>14</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>15</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

## Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3327.

## Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me at (425) 229-2565 or [jing.song@ecy.wa.gov](mailto: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:        Marsi Beeson, GeoEngineers , Inc., ([mbeeson@geoengineers.com](mailto:mbeeson@geoengineers.com))  
              NWRO VCP Coordinator, ([vcp-nwro@ecy.wa.gov](mailto:vcp-nwro@ecy.wa.gov))  
              Fiscal, VCP Fiscal Analyst, ([ecyrevcp@ecy.wa.gov](mailto:ecyrevcp@ecy.wa.gov))

## 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 Southgate Oil Site is defined by gasoline, diesel, and heavy oil range petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O), benzene, methylene chloride, tetrachloroethene (PCE), naphthalenes, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), cadmium, lead, and mercury released to soil.

The Site is located between Pacific Highway South (State Route 99) and 30<sup>th</sup> Avenue South in Kent, WA, and is approximately 500 feet south of Kent Des Moines Road (State Route 516, **Figure 1**).

The majority of the Site footprint is located on one 0.64-acre King County parcel 2500600480, where the contaminants were released. This parcel is hereafter referred to as "Source Property". The Source Property was identified by Sound Transit as FL-209, with a former street address 23428 Pacific Highway South. Based on investigation data, the Site consists of the Source Property and the adjacent properties to the north and southeast, referred to as "Muscatel Property" and "Marine Office and Garage Property", respectively (**Figure 1**).

### Area and Property Description

The area surrounding the Site is zoned for "Midway Transit Community 1" (MTC-1) or "Midway Transit Community 2" (MTC-2). Both zoning designations allow moderately dense or dense *"retail, office, or residential activities in support of rapid light rail and mass transit options..."*<sup>1</sup>. The Site and the surrounding properties and their former uses are depicted on **Figures 1 and 2**.

#### **North:**

The Source Property is bounded to the north by a 2.17-acre commercial property owned by Muscatel Midway Properties, LLC, parcel 2500600465 (Muscatel Property). The Muscatel Property is occupied by a multi-tenant retail building that was constructed in 1962. Petroleum hydrocarbon contamination from the Source Property migrated to the southern portion of the Muscatel Property.

Further north is a paved parking lot and a one-story commercial building, currently occupied by retail businesses.

---

<sup>1</sup> Kent City Code, Chapter 15.03, District Established – Zoning Map; [Kent City Code \(codepublishing.com\)](http://codepublishing.com)



***South:***

The Source Property is bounded to the south and southeast by three vacant lots. Sound Transit has acquired all three parcels for construction of light rail facilities. These parcels are summarized as follows:

Location	Parcel Number	Parcel Address	Parcel Area	Former Uses
Southeast of Source Property	2500600481	23427 30 <sup>th</sup> Avenue South	0.14 acre	Allison Marine boat engine repair garage and office
South of Source Property	2500600486	23431 30 <sup>th</sup> Avenue South	0.49 acre	Allison Marine boat and equipment parking and storage
South of Source Property	2500600485	23434 Pacific Highway South	0.27 acre	Mixed-use commercial building and apartments

Site contamination extended onto the northwest corner of parcel 2500600481 (Marine Office and Garage Property).

***East:***

The Site is bounded to the East by 30th Avenue South. A motel is located further northeast, and a vacant lot is located further east.

***West:***

The Site is bounded to the West by Pacific Highway South (State Route 99) and retail shops. Further west are multifamily residential developments.

**Site History and Current Use*****Source Property:***

The earliest identified development on the Source Property was a single-family residence with oil heat and a septic tank, constructed in 1931 and demolished by 2002.

A former bulk fuel distribution facility operated on the Source Property for approximately 75 years, most recently under the business name of Southgate Oil. The facility stopped distributing fuel in or around 1999. The facility included at least 11 underground storage tanks (USTs), multiple fuel dispensers, and an auto repair garage. The USTs were installed between the 1950s and 1990s. The automotive repair shop building was constructed in the late 1940s. The locations of the former facilities are depicted on **Figures 3 and 4**.

Nine USTs, ranging in capacity from 275 to 10,000 gallons and containing gasoline, diesel, and heating oil, were removed from the Source Property in October and November 2000. Two additional heating oil USTs (20,000 and 25,000 gallons) were removed in February 2002. Petroleum-contaminated soil (PCS) was encountered during both UST removal activities.

Sound Transit acquired the Source Property and demolished all former facilities by 2020. The northern portion of the Source Property has been developed with new right-of-way (ROW), South 234th Street, with adjacent new sidewalks, landscaping and subsurface utilities. The southern portion is currently used as a construction staging area (**Figure 5**).

***Muscatel Property:***

The Muscatel Property was developed with a one-story multi-tenant commercial building in 1962. The western portion of the building was damaged by a fire in November 2016; the damaged portion of the building was demolished in late 2017 and has been rebuilt.

A gasoline service station with a possible auto repair garage historically operated on the southwest corner of the Muscatel Property in the 1930s and 1940s. A dry cleaner formerly operated in a tenant space in the current building from as early as 1970 until at least 2009, most recently under the business name Kings Cleaners (from 1996 to 2009). Investigations completed on the Muscatel Property did not confirm any contamination associated with the former service station or dry cleaner.

Sound Transit acquired a small portion of the Muscatel Property (eastern boundary and southwest corner) for light rail facilities construction. The majority of the Muscatel Property is expected to continue operation as a retail building.

***Marine Office and Garage Property:***

The Marine Office and Garage Property was developed with two office buildings in 1977 and 1985. These buildings were occupied by Allison Marine boat engine repair garage and Midway Auto & Detail office before demolition.

Sound Transit acquired the Marine Office and Garage Property and demolished all structures in 2020. It is currently used as equipment staging area for light rail construction (**Figure 5**).

**Sources of Contamination**

Petroleum hydrocarbons released to soil were initially discovered during a UST removal in 2000. The releases are likely associated with USTs, fuel dispenser islands, product piping, and the service garage of the former bulk fuel distribution facility. The exact time of release is unknown.

**Physiographic Setting**

The Site is situated at an elevation of approximately 400 feet above mean sea level (amsl). The land surface at the Site and vicinity slopes gently to the north-northwest towards Massey Creek.

A retaining wall was formerly present between the Source Property and the north-adjacent Muscatel Property. The Muscatel Property is approximately 3 to 5 feet lower than the Source Property in ground surface elevation. This retaining wall was removed in 2020.

### **Surface/Storm Water System**

The closest surface water body is Massy Creek located approximately 850 feet northwest of the Site. The Green River is located approximately 1 mile east of the Site, and Puget Sound is located approximately 1.4 miles west of the Site. The storm water catch basins on the Site were formerly connected to the storm water line along Pacific Highway South, located to the west of the Site. Two new catch basins have been constructed in the south portion of the new ROW and discharge east to the storm water line along 30th Street, located to the east of the Site.

### **Ecological Setting**

Land surfaces on the Site and vicinity are/will be primarily covered by buildings or light rail structures, with asphalt or concrete pavement and small landscaped areas. The Site qualifies for an exclusion from further terrestrial ecological evaluation per WAC 173-340-7491(1)(c). There are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of the Site.

### **Geology**

The Site is located near the crest of a narrow north-south trending glacial feature known as the Des Moines Drift Plain<sup>2</sup>. The Des Moines Drift Plain is an upland area bordered by Puget Sound on the west (at sea level) and the Green River Valley on the east (valley floor elevation typically averages about 30 feet amsl), with maximum elevations ranging from 400 to 450 feet amsl.

The most prevalent geologic unit at the ground surface on the Des Moines Drift Plain is Vashon glacial till, which was laid down beneath the most recent continental glacier<sup>3</sup>. Based on field observations, subsurface soils at the Site consist of silt and gravel and silty sand with gravel (fill) to a depth of approximately 20 feet below ground surface (bgs). The fill is underlain by dense silty, fine to coarse sand with various amounts of gravel to the total explored depth of 65 feet bgs. This layer is interpreted as glacial till.

### **Groundwater**

In 2016, two geotechnical borings (FWLE-D01P and FWLE-D02) were advanced approximately 300 feet northeast and 30 feet east of the Site, respectively (**Figure 2**). The depths to

---

<sup>2</sup> United States Environmental Protection Agency, Region 10, *Second Five-Year Review Report for Midway Landfill Superfund Site, Kent, Washington*, September 2010.

<sup>3</sup> City of Kent, *Water System Plan 2019 – 2029*; [Water Operations | City of Kent \(kentwa.gov\)](https://www.kentwa.gov/)

groundwater were measured at approximately 58 feet bgs at boring FWLE-D01P, and at approximately 78 feet bgs in FWLE-D02 (closer to the Site).

Two drilled shafts were completed to 60 feet bgs directly southeast of Site during the light rail construction. Approximately 1 foot of groundwater was encountered at approximately 60 feet bgs in the base of one shaft. No water was observed in the second drilled shaft that is adjacent to the Site.

In September 2024, a monitoring well FL209-MW1 was advanced to a depth of 65 feet bgs at the Site (**Figure 5**). No evidence of perched groundwater was observed in the boring.

Based on these field observations, continuous groundwater at the Site appears to be present below 65 feet bgs.

### **Water Supply**

Drinking water for the area is supplied by the Highline Water District. The District purchases approximately 70% of its water supply from Seattle Public Utilities and obtains the remaining 30% from four District-owned groundwater supply wells. The Site is located outside of the 10-year time-of-travel wellhead protection zone of all water supply wells.

### **Release and Extent of Contamination**

Subsurface investigations and cleanup actions have been conducted at the Site since 2000.

#### ***2000 to 2002 UST Removal:***

In October through November 2000, nine USTs with capacity ranging from 275 to 10,000 gallons and storing gasoline, diesel, and heating oil were removed from the Source Property. Two dispenser islands were also removed. Approximately 350 cubic yards of PCS were removed from the UST excavations, and an additional 200 cubic yards of PCS were removed from the dispenser islands excavations. The excavations were reportedly backfilled with the excavated soil that had been remediated on Site.

In February 2002, two heating oil USTs (20,000-gallon and 25,000-gallon) and one dispenser island were removed from the Source Property. Approximately 748 tons of PCS were excavated to a maximum depth of 25 feet bgs and disposed of off-Site. The remedial excavation was stopped at the northern boundary with the Muscatel Property (**Figure 3**).

#### ***2017 to 2020 Subsurface Investigations:***

In 2017 through 2020, numerous soil borings and test pits were advanced to depths ranging from 0.5 to 31 feet bgs at the Site, including the Source Property, the Muscatel Property, the Marine Office and Garage Property, and other adjacent properties to the south (**Figure 3**, **Figure 6**, and **Figure 7**).

Site investigations confirmed the presence of the following contaminants in the following areas and depths:

Areas of Concern	Contaminants with Concentrations > Cleanup Levels	Maximum depths with detected exceedances/Sample Location
Western Portion of the Site	TPH-D + TPH-O	15 feet bgs / PH209-17
Central Portion of the Site	TPH-D + TPH-O, naphthalenes, mercury	21 feet bgs / FL209-B8
Eastern Portion of the Site	TPH-D + TPH-O, naphthalenes	4 feet bgs / FL209-B11
Service Garage area	TPH-G, TPH-D + TPH-O, naphthalenes, cPAHs, methylene chloride, cadmium, lead	3 feet bgs / PH209-1
Muscatel Property	TPH-G, TPH-D + TPH-O, benzene	8 feet bgs / ECI-B13

### ***2019 to 2020 Remedial Excavations:***

Remedial excavations were conducted throughout the Site in 2019 through 2020. A total of approximately 6404 tons of contaminated soil were removed from the excavations on the Source Property and Marine Office and Garage Property. Another 166 tons of contaminated soil was removed from the Muscatel Property. Remedial excavations were conducted in the following areas:

- Western Portion of the Site:  
An approximately 54-feet-long by 41-feet-wide excavation was completed to total depths ranging from 16 to 20 feet bgs (**Figure 8**). All 14 confirmation soil samples were below MTCA cleanup levels for TPH-G, and TPH-D + TPH-O. Selected soil samples were additionally tested for naphthalenes or cPAHs; all concentrations were below MTCA cleanup levels.
- Central Portion of the Site (including Marine Office and Garage Property):  
An approximately 63-feet-long by 55-feet-wide excavation was completed to total depths ranging from approximately 20 to 30 feet bgs. The southeast corner of the excavation extended into the Marine Office and Garage Property (**Figure 8**). All 34 confirmation soil samples were below the MTCA cleanup levels for TPH-G, TPH-D + TPH-O, and naphthalenes. Selected soil samples were additionally tested for mercury or cPAHs; all concentrations were below MTCA cleanup levels.
- Eastern Portion of the Site:  
An approximately 20-feet-wide by 25-feet-long excavation was completed to an average depth of 6 feet bgs (**Figure 8**). All six confirmation soil samples were below MTCA

cleanup levels for TPH-G, TPH-D + TPH-O, and naphthalenes. Selected soil samples were additionally tested for cPAHs; all concentrations were below MTCA cleanup levels.

- **Service Garage Area:**

An approximately 28-feet-long by 16-feet-wide excavation was completed to an average total depth of 5 feet bgs (**Figure 8**). During excavation, one soil sample collected from the north excavation sidewall contained a PCE concentration above the MTCA Method A soil cleanup level. This area was subsequently over-excavated, and an additional sidewall sample was collected. All final six confirmation soil samples were below MTCA cleanup levels for TPH-G, TPH-D + TPH-O, volatile organic compounds (VOCs, including PCE and methylene chloride), cadmium, lead, naphthalenes and/or cPAHs.

- **Muscatel Property:**

In 2019, four test pits (TP1, TP2, TP3, and TP3-2) were excavated to total depths ranging from 1.5 to 4 feet bgs on the Muscatel Property in confirmed contaminated areas (**Figure 9**). All 30 confirmation soil samples were below the MTCA cleanup levels for TPH-G, TPH-D + TPH-O, and VOCs.

An approximately 30-feet-long by 18-feet-wide excavation was subsequently completed to total depths ranging from 13 to 15 feet bgs along the southern boundary of the Muscatel Property (see FL207 2019 ECI Remedial Area, **Figure 8**). All 14 confirmation soil samples were below the MTCA cleanup levels for TPH-D + TPH-O.

In 2020, the then-existing retaining wall was removed, and the residual PCS was excavated to approximately 16 feet below the ground surface of the Source Property, or approximately 12 feet below the ground surface of the Muscatel Property, due to the elevation difference between the two properties at the time (**Figure 8**). All five confirmation soil samples were below the MTCA cleanup levels for TPH-G, TPH-D + TPH-O, and benzene, toluene, ethylbenzene, and xylenes (BTEX).

- **Utility Trench Area on the Eastern Edge of the Site:**

In 2020, PCS was discovered at approximately 3 feet bgs on the eastern edge of the Source Property during utility trenching work. Over-excavation was completed to a total depth of 12 feet bgs (**Figure 8**). All 11 confirmation soil samples were below MTCA cleanup levels for TPH-G, TPH-D + TPH-O, and BTEX.

#### ***2024 Post-remediation Monitoring:***

One boring (FL209-MW1) was advanced to a depth of 65 feet bgs on the central portion of the Site near two excavation bottom samples that had previous detections of TPH-D + TPH-O, with resultant concentrations below the cleanup level (**Figure 5**). No evidence of groundwater was observed in this boring. Soil samples collected between 40 and 65 feet bgs from the boring contained TPH-D + TPH-O concentrations below the MTCA cleanup level.

## Site Diagrams



# Enclosure A: Figure 1



EagleView Technologies, Inc., King County, King County

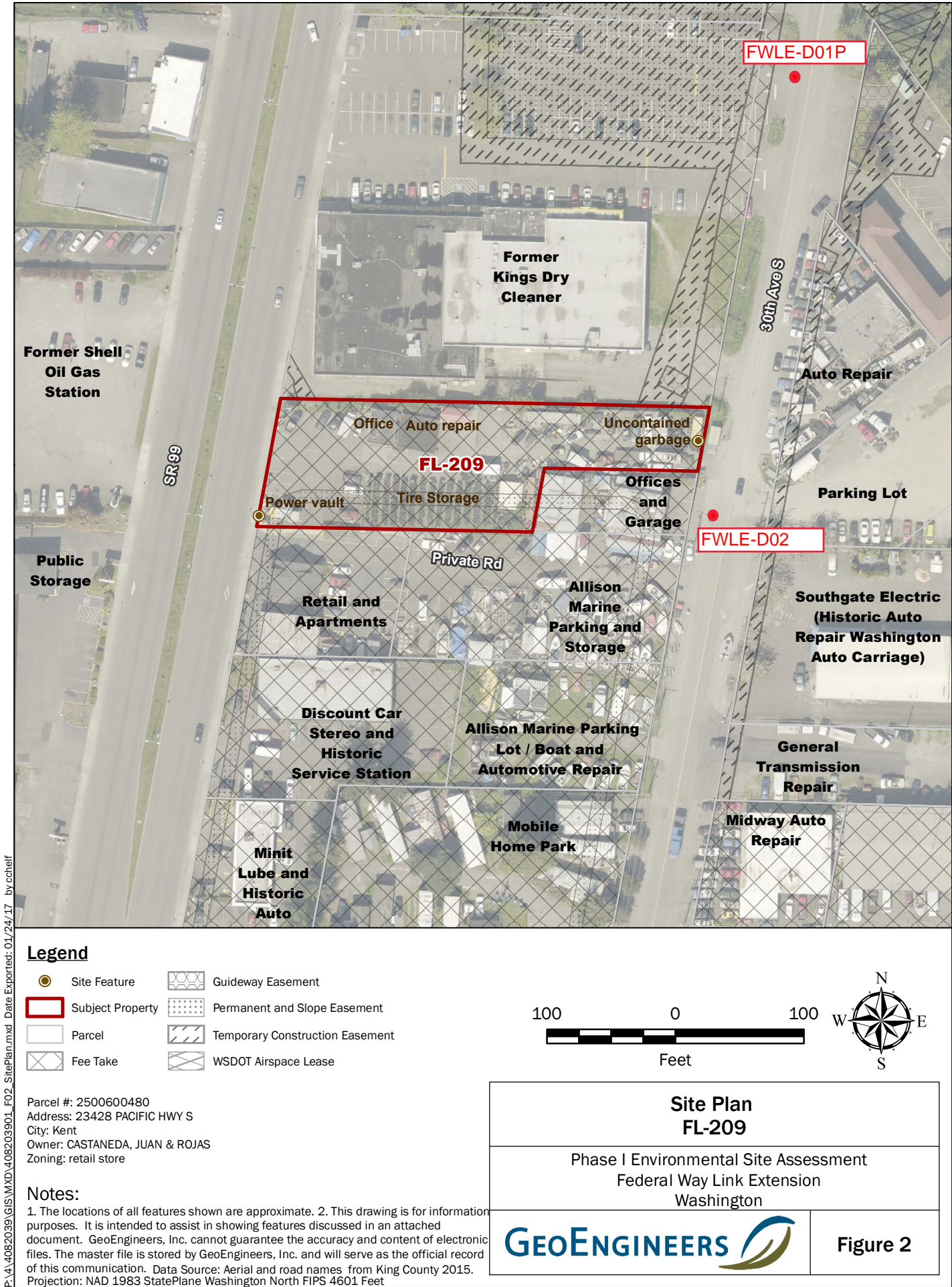
Produced by Ecology  
From King County iMap

Vicinity Map  
Southgate Oil Site



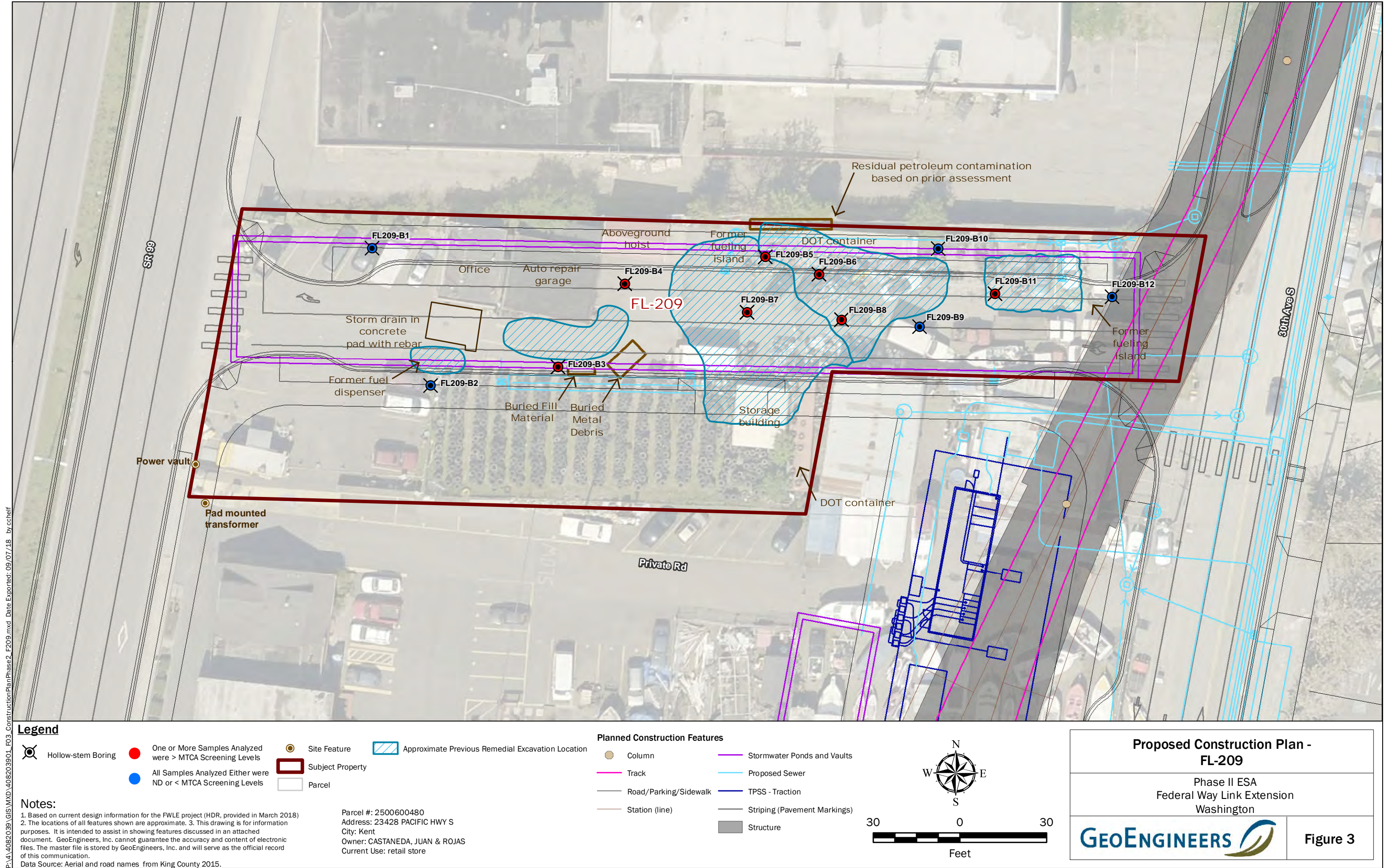


Enclosure A: Figure 2





Enclosure A: Figure 3





12/1/00 progress

UST, Removal  
10/00  
Site Plan

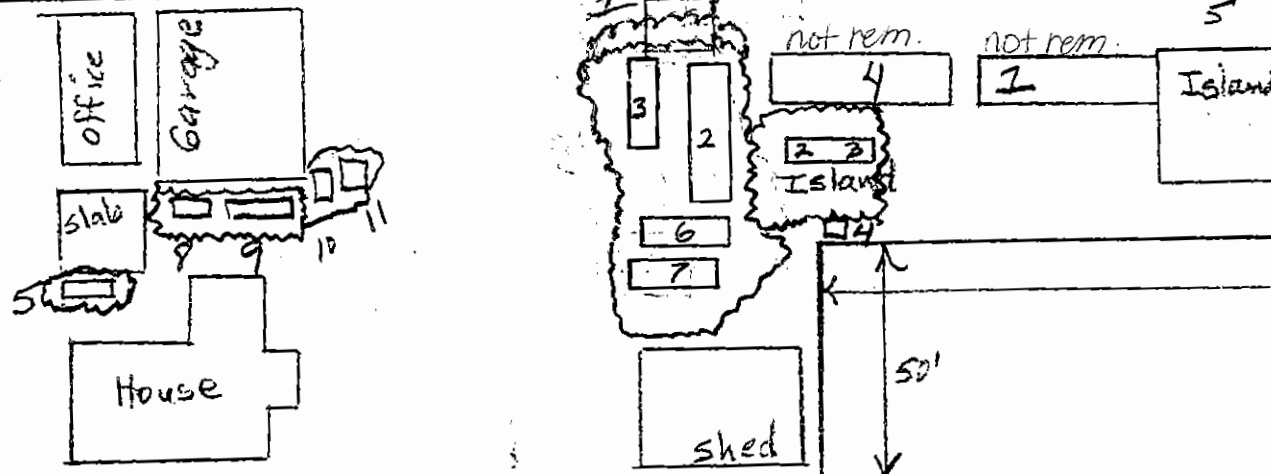
Southgate Oil  
23428 Pacific Hwy S  
Kent WA

Tanks:

# 1	25,000	# 8	650
# 4	20,000	# 9	1000
# 3	5,000	# 10	275
# 2	10,000	# 11	550
# 5	41000		
# 6	3000		
# 7	3000		

Tax lot # 250060-0480  
Site # 97588

334.09'



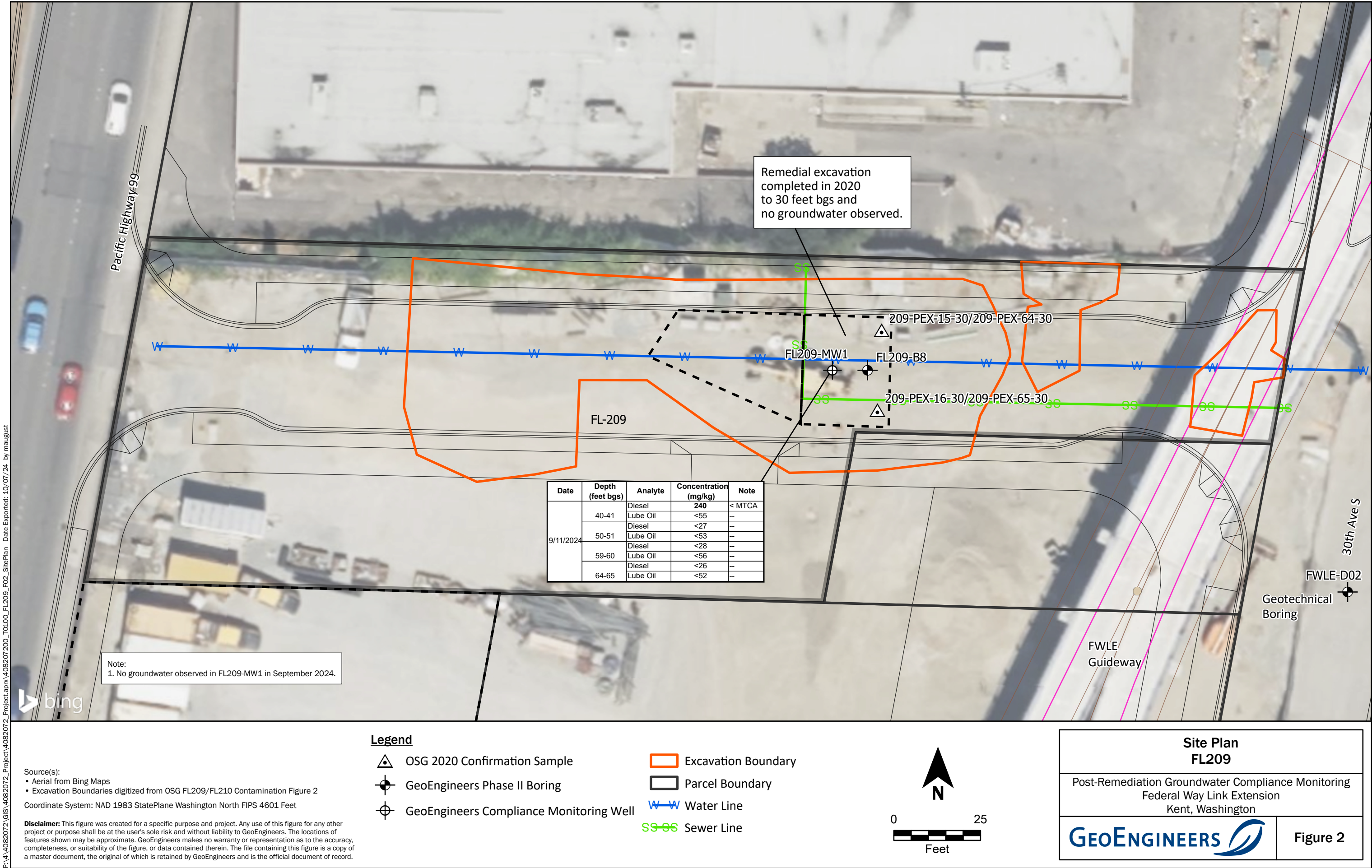
Removal Planned For:

- # 3 - 5,000 diesel
- # 2 - 10,000 Gas
- # 5 - 41000 diesel

Pacific Hwy S

30th Ave S

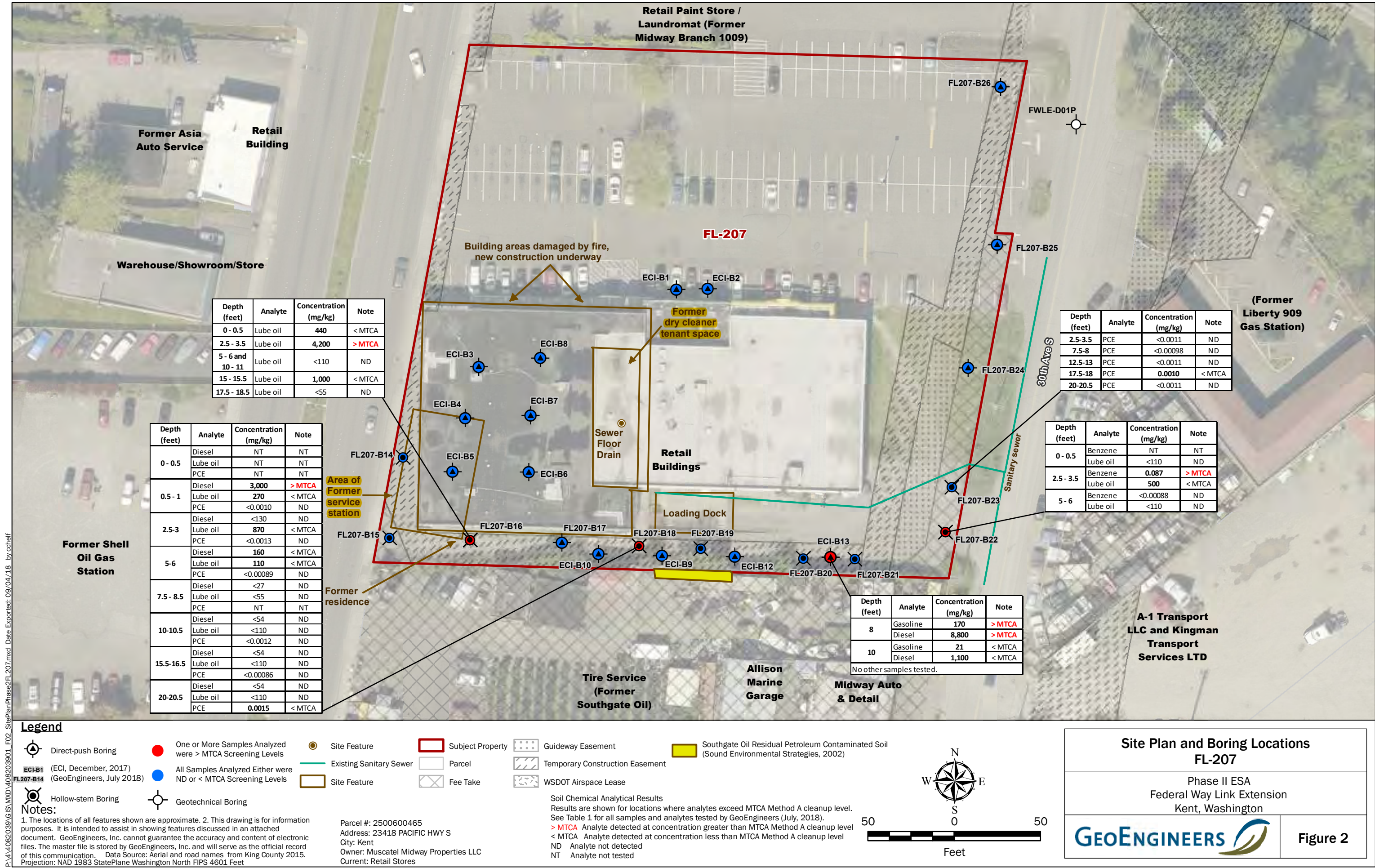
Enclosure A: Figure 5



P:\4 4082072\GIS\4082072\_GIS\408207200\_F02\_SitePlan Date Exported: 10/07/24 by maugust

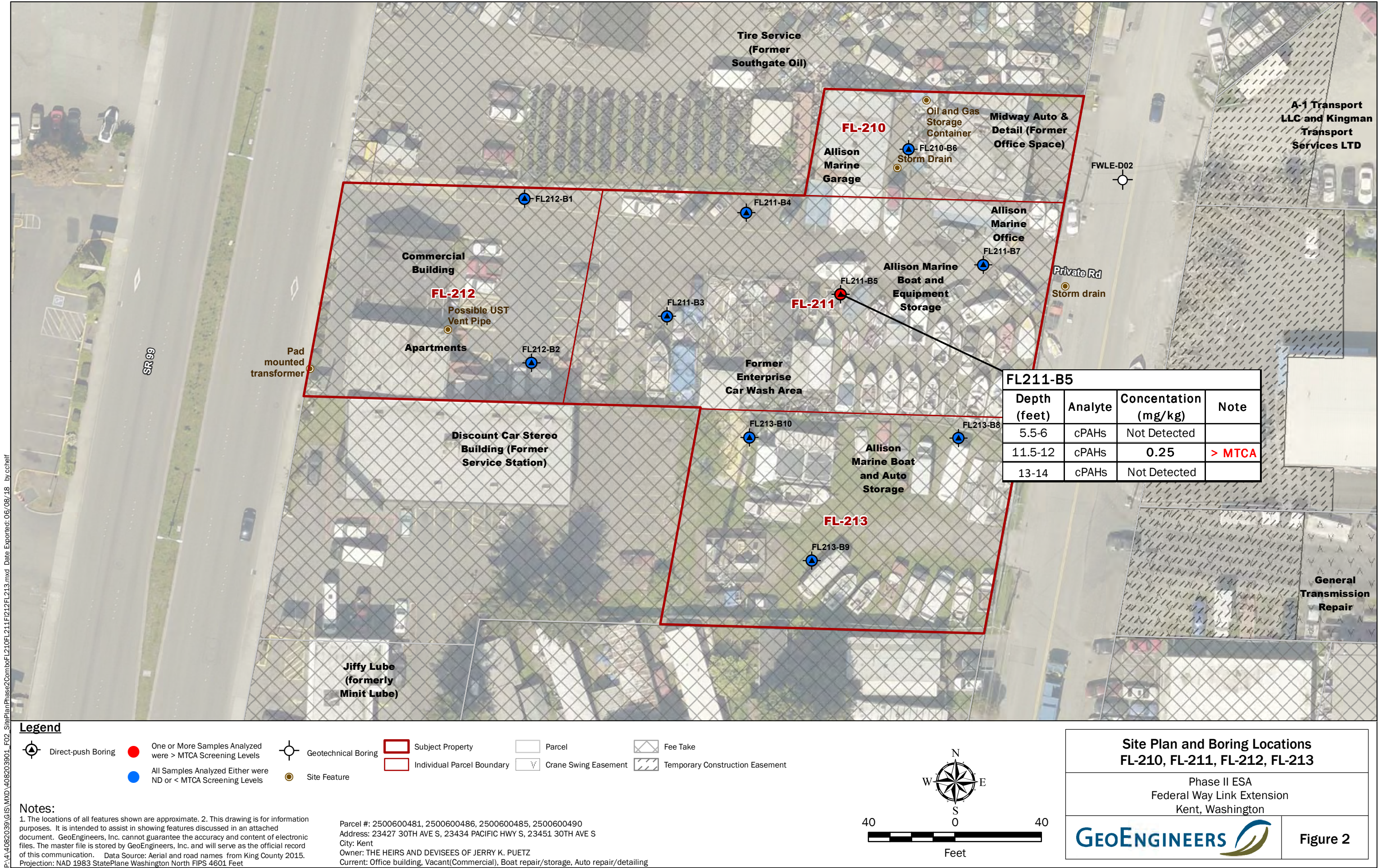


Enclosure A: Figure 6





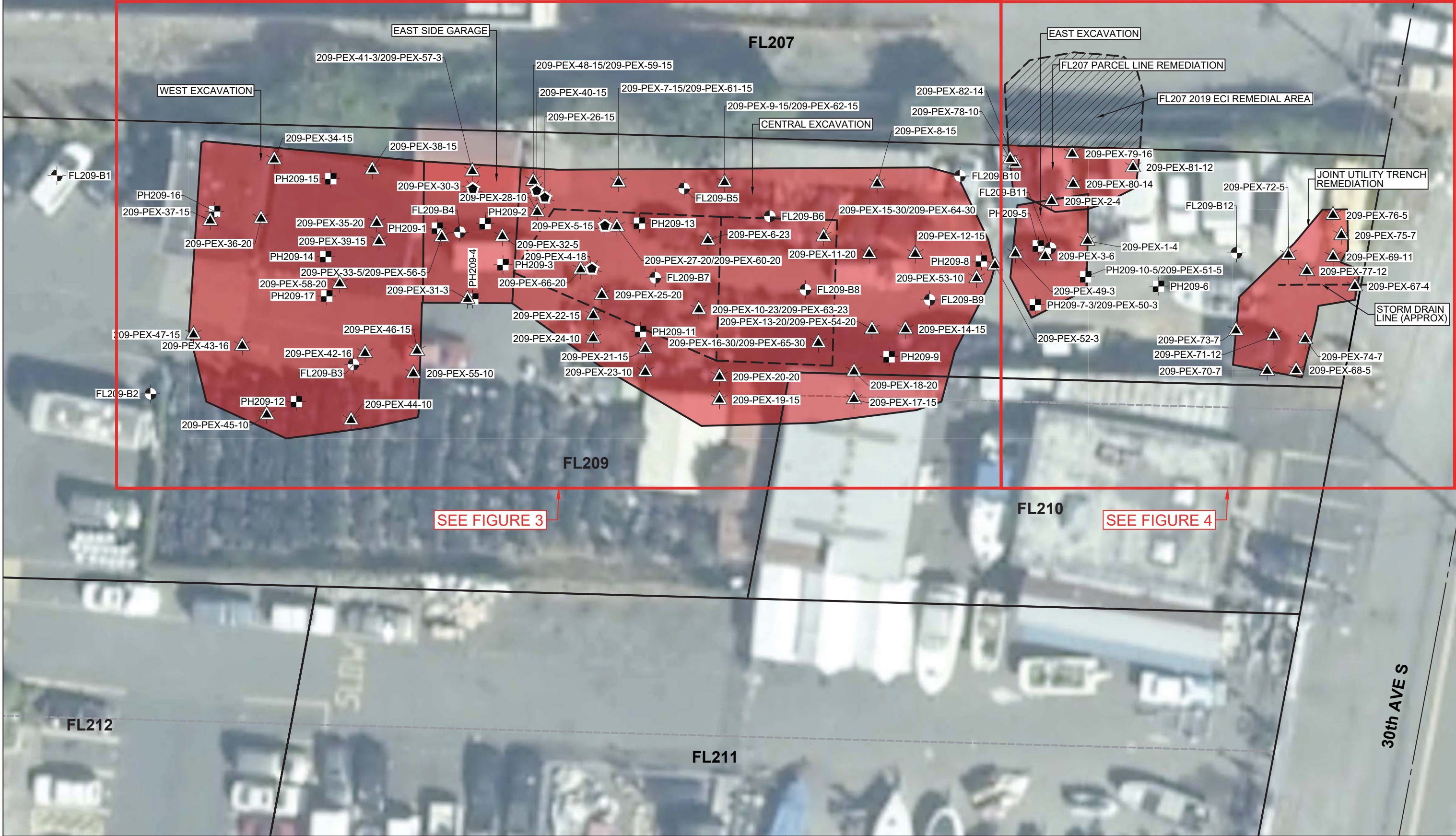
Enclosure A: Figure 7





1/25/2021 10:34 AM  
Z:\Shared\CADD\2021\_Kiewit\_Federal\_Way\Phase II ESA\FWLE\_Proposed Soil Excavation Areas.dwg Layout:FL209-FL210 (F2)

# Enclosure A: Figure 8



SEE FIGURE 3

SEE FIGURE 4



## LEGEND

- FL209-B1 - GEOENGINEERS PHASE II BORING
- PH209-1 - SUPPLEMENTAL INVESTIGATION
- 209-PEX-1-4 - CONFIRMATION SAMPLE

- 209-PEX-40-15 - REMOVED CONFIRMATION SAMPLE
- AREAS OF VARIABLE TOTAL DEPTH OF EXCAVATION (SEE LABELS)
- PARCEL LINES



FEDERAL WAY LINK EXTENSION  
SEATAC AND FEDERAL WAY  
KING COUNTY, WASHINGTON

FL209/FL210 CONTAMINATION

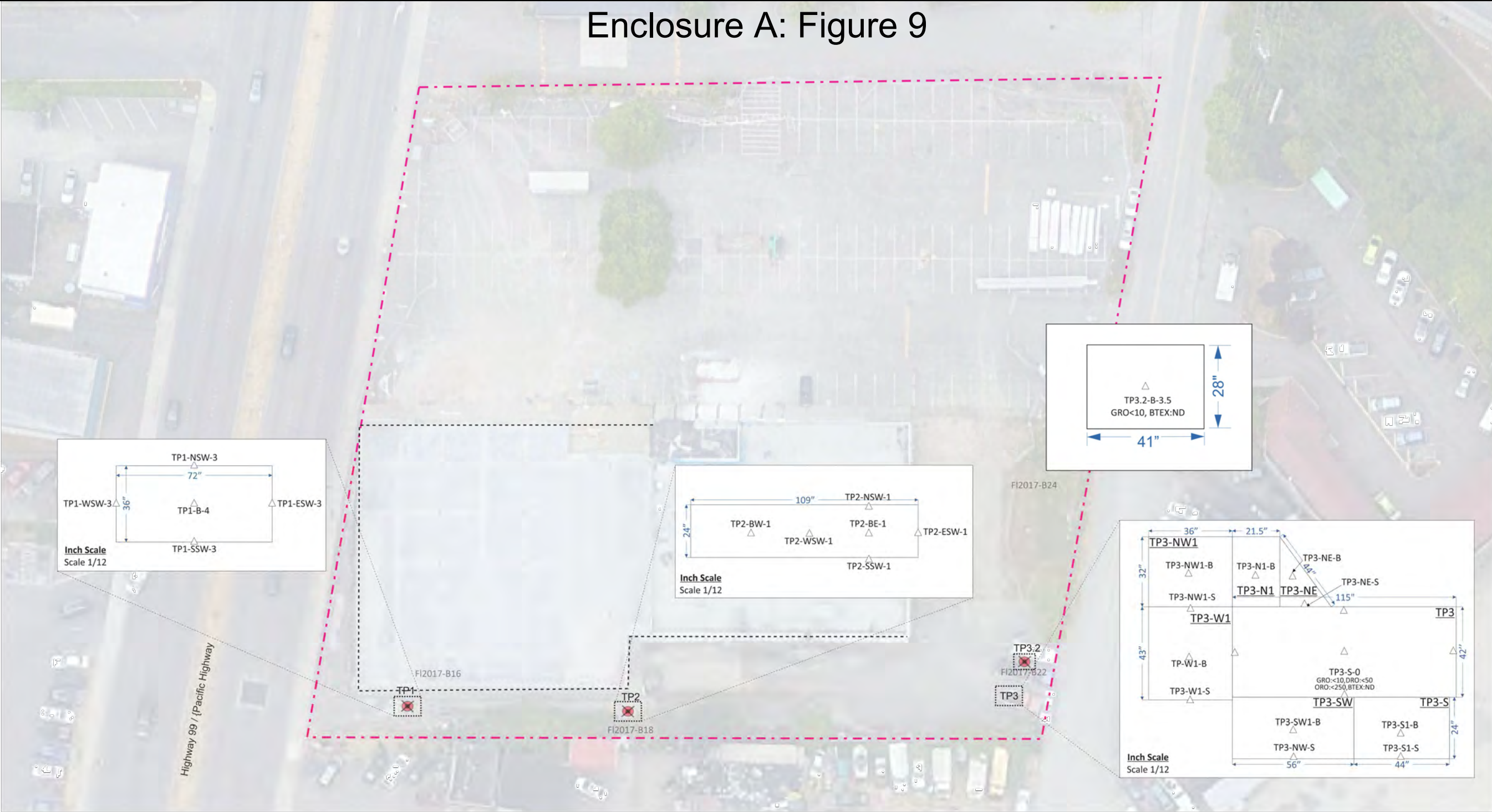
Drawn By:	J. Stewart
Reviewed By:	S. Darst
Approved By:	V. Atkins
Date:	May 2020
Project No.:	2021

FIGURE

2



Enclosure A: Figure 9



Approximate Scale In feet

**Explanation**

- △ Soil Sample Location
- ⊗ GeoEngineers Sample Locations
- ECI Test Pit Locations

Previous Sample Locations Map  
Supplemental Focused Subsurface Investigation  
23418 Pacific Hwy S  
Kent, WA 98032

Date:	March 5, 2019	Figure No.:
Completed By:	K. Spencer	<b>04</b>
Reviewed By:	S. Spencer	
Version:	ECI-001	
Project No.:	0673-01-02	Sheet 04 of 05

**FARALLON**  
CONSULTING

Quality Service for Environmental Solutions | farallonconsulting.com

Washington  
Issaquah | Bellingham | Seattle

Oregon  
Portland | Baker City

California  
Oakland | Folsom | Irvine

Drawn By: NM    Checked By: JR

**FIGURE 4**  
PREVIOUS SAMPLE LOCATIONS MAP  
MUSCATEL PROPERTY  
23418 PACIFIC HIGHWAY SOUTH  
KENT, WASHINGTON

R:\Projects\2532-001\CAD\2532-001.dwg 3/5/2021 11:40 AM (Nick Miller)



## Enclosure B

---

Basis for the Opinion: List of Documents

## **Basis for the Opinion: List of Documents**

1. Nowicki & Associates, Inc., *Progress Site Assessment Southgate Oil Site, 23428 Pac Hwy S, Kent, WA*, May 3, 2001.
2. Sound Environmental Strategies, Corp., *Underground Storage Tank Decommissioning and Soil Remediation Project, 23428 Pacific Highway South, Kent, Washington*, February 25, 2002.
3. Department of Ecology (Ecology), *No Further Action determination letter, Southgate Oil, VCP No. NW0982*, February 10, 2003 (Rescinded).
4. Ecology, *Re: Notification of Pending Inactive Determination Status for the following Hazardous Waste Site, Southgate Oil, 23428 Pacific Hwy S, Kent, WA, Facility Site No: 84946863, VCP No.: NW0982*, April 10, 2006.
5. Ecology, *Re: Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site, Southgate Oil, 23428 Pacific Hwy S, Kent, WA, Facility Site No: 84946863, VCP No.: NW0982*, June 9, 2006.
6. Ecology, *Re: Determination Status for the following Hazardous Waste Site enrolled in the Voluntary Cleanup Program, Southgate Oil, 23428 Pacific Hwy S, Kent, WA, Facility Site No: 84946863, VCP No.: NW0982*, June 9, 2006.
7. Marsilio Di Giovanni, *Ref: Letter dated April 10, 2006 and June 9, 2006 in regard to Southgate Oil property*, June 16, 2006.
8. Sound Transit, *Federal Way Link Extension, AE 0044-12 WP 3.S Phase I Environmental Site Assessment, FL-209, Tax Parcel 2500600543*, March 2017.
9. EcoCon, Inc. (ECI), *Focused Subsurface Investigation Report, 23418 Pacific Highway South, Kent, Washington*, December 18, 2017.
10. GeoEngineers, *Federal Way Link Extension, AE 0044-12 WP 3.S, Phase I Environmental Site Assessment, FL207, Tax Parcel 2500600465*, March 2018.
11. GeoEngineers, *Phase II Environmental Site Assessment Report, Sound Transit – Federal Way Link Extension, Parcel FL-210, FL-211, FL-212, FL-213, Allison Marine Boat Storage and Repair, Mixed-use Property, Kent, Washington*, June 14, 2018.
12. GeoEngineers, *Phase II Environmental Site Assessment Report, Sound Transit – Federal Way Link Extension, Parcel FL-207, Former Dry Cleaner and Service Station, 23418 Pacific Highway South, Kent, Washington*, September 21, 2018.
13. ECI, *Supplemental Focused Subsurface Investigation Report, 23418 Pacific Highway South, Kent, Washington*, March 3, 2019.

14. ECI, *Cleanup Action Report, Affected Property: 23418 Pacific highway South, Kent, WA, Source Property: 23428 Pacific Highway South, Kent, WA, Site: Southgate Oil Site*, December 31, 2019.
15. Sound Transit, *Notice of MTCA Cleanup Action, Former Southgate Oil, King County Tax Parcel 2500600480, 23428 Pacific Highway South, Kent, Washington*, May 15, 2020.
16. ECI, *Re: Correction to the Cleanup Action Report, 23418 Pacific Highway South, Kent, Washington 98032*, July 10, 2020.
17. O'Neill Service Group, *Soil Characterization and Remediation Report, Parcel FL209, Federal Way Link Extension Project, 23428 Pacific Highway South, Kent, Washington*, January 26, 2021.
18. Farallon Consulting LLC (Farallon), *Re: Summary Report Subsurface Investigation and Cleanup Action, Muscatel Midway Property, 23418 Pacific Highway South, Kent, Washington*, March 5, 2021.
19. Ecology, *Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for a Property associated with a Site, Southgate Oil – Muscatel Midway, 23418 Pacific Highway South, Kent, Washington 98032, VCP NW3309*, June 23, 2021.
20. Southgate Oil, *Terrestrial Ecological Evaluation form*, November 9, 2021.
21. GeoEngineers, *Revised VCP Application Cover Letter and Request for Opinion on Completed Cleanup Southgate Oil Site, Source Parcel: 23428 Pacific Highway South, Kent, Washington, King County Parcel 2500600480, Sound Transit Federal Way Link Extension Parcel FL209*, May 17, 2022.
22. Ecology, *Re: Termination of VCP Agreement for the following Site, Southgate Oil – Muscatel Midway, 23418 Pacific Highway South, Kent, Washington 98032, VCP NW3309*, June 9, 2022.
23. Ecology, *Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site, Southgate Oil, 23428 Pacific Highway South, Kent, Washington 98032, VCP NW3327*, June 15, 2022.
24. GeoEngineers, *Post-Remediation Compliance Monitoring, Former Southgate Oil, 23428 Pacific Highway South, Kent, Washington (Sound Transit Federal Way Link Extension Parcel FL209)*, October 30, 2024.