From: Unruh, David (ECY)
To: "Martini, Cory"
Subject: RE: NW3393 - 503 Bella St Additional Data Requests
Date: Thursday, July 18, 2024 2:28:24 PM
Attachments: image001.png

Hi Cory,

Thank you again for providing the initial results of your soil sampling effort at 503 Bella St. Here are Ecology's findings regarding the data:

- Soil samples collected from TA1-5 and TA1-6 confirm that the total area of TPH-O above the cleanup level protective of animals and soil biota is approximately 250 ft^2. Per WAC 173-340-7492(2)(a)(i), Ecology concurs that the simplified TEE may be ended since the total area of TPH-O above the cleanup level is less than 350 ft^2.
- Soil samples collected from BP1-S2 and BP1-B2 contained benzene above the Method A cleanup level. We discussed several options internally to address this remaining contamination:
    - Model natural degradation of benzene to estimate when the cleanup level may be met at the Site. You may do this, but Ecology would still require confirmation samples be collected from these two locations to ensure that conditions at the Site match those of the model. Ecology could not issue a No Further Action (NFA) opinion until it is confirmed that benzene is no longer present above the cleanup level.
    - Record institutional controls at the Property to contain contamination. In this case, a cap limiting access to remaining contamination and deed restrictions ensuring the maintenance of the cap and restricting use of the property would likely be necessary. In addition, since benzene is present above the cleanup level protective of leaching to groundwater, a more robust demonstration that the release does not pose a risk to groundwater would be necessary. Again, Ecology would not be able to issue an NFA opinion until the deed restrictions were recorded with the county.
    - Excavation of the remaining contamination is another option. This would be the most permanent and protective option since remaining contamination would be removed. Given the depth of contamination and results from adjacent confirmation samples, this may be more cost-effective than the other options listed here in dealing with the remaining contamination at the site.

Please feel free to give me a call if you would like to discuss further. Let me know if there are any other questions I can answer for you.

Thanks,
David

David Unruh, LHG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Unruh, David (ECY)
Sent: Friday, July 12, 2024 9:33 AM
To: 'Martini, Cory' <cmartini@partneresi.com>
Subject: RE: NW3393 - 503 Bella St Additional Data Requests

Received, thank you Cory! I'll have a look at these results and have some internal discussions. I'll have an answer for you by the time you're back from your time off next week.

Thank you and enjoy your vacation!
David

David Unruh, LHG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Martini, Cory <cmartini@partneresi.com>
Sent: Friday, July 12, 2024 9:11 AM
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Subject: RE: NW3393 - 503 Bella St Additional Data Requests

External Email

David,

As we discussed, attached are the data table, lab report and figures for the additional soil samples collected at this site.

Thank you,

Cory Martini, SST, CDPH
Senior Project Manager
1512 Eureka Road, Suite 205, Roseville, CA 95661
T: 916-405-1275 | F: 916-672-2705 | M: 916-838-7365

PARTNER ENGINEERING AND SCIENCE, INC. | www.partneresi.com

More than just assessments – *solutions.*

From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Monday, June 10, 2024 8:50 AM
To: Michael Pereira <MichaelPereira@UmpquaBank.com>; Martini, Cory <cmartini@partneresi.com>
Subject: RE: NW3393 - 503 Bella St Additional Data Requests

CAUTION: This message originated from outside the Partner organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi again Cory and Michael,

I was looking through the data we have for the site with respect to the Terrestrial Ecological Evaluation (TEE). Since the site is located in an area with "undeveloped land" as defined in WAC 173-340-7491(1)(c)(iii) and some samples contain oil-range petroleum hydrocarbons (TPH-O) above the natural background concentrations, it will be necessary to conduct a simplified TEE. Please see WAC 173-340-7492 for further discussion about the simplified TEE process. Two samples (TA1-S and TA1-4) contain TPH-D above the cleanup levels protective of ecological receptors (460 mg/kg; see Table 749-2).

The best route to end the simplified may be to use an exposure analysis for this site (WAC 173-340-7492(2)(a)(i)). Based on the findings from the rest of the site, it seems like the extent of soil containing TPH-D above the cleanup level referenced above in Table 749-2 will be relatively limited. To demonstrate this, Ecology recommends collecting two additional soil samples west and south of TA1-4 at approximately the same depth. We can use the data from TA1-BS and TA7-W to bound the north and east extent of contamination.

Please let me know if you have any questions about the TEE process. I'm happy to set up another meeting if that would be helpful as well.

Thank you,
David

David Unruh, LHG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Unruh, David (ECY)
Sent: Wednesday, June 5, 2024 1:48 PM
To: 'Michael Pereira' <MichaelPereira@UmpquaBank.com>; Martini, Cory <cmartini@partneresi.com>
Subject: RE: NW3393 - 503 Bella St Additional Data Requests

Hi Cory and Michael,

One more thing I forgot to mention this morning. We'll also need you to complete a Terrestrial Ecological Evaluation (TEE) form. The TEE is intended to determine whether more stringent cleanup levels protective of wildlife are necessary at the Site. This can be included with the revised report or memo discussed in my earlier email.

Thanks again,
David

David Unruh, LHG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Michael Pereira <MichaelPereira@UmpquaBank.com>
Sent: Wednesday, June 5, 2024 11:21 AM
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>; Martini, Cory <cmartini@partneresi.com>
Subject: Re: NW3393 - 503 Bella St Additional Data Requests

External Email

Thank you!

MP

Michael Pereira
VP, Environmental Risk Officer
Real Estate Valuation Services

M 509-220-3338

Together for Better. Learn more at www.umpquabank.com

From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Wednesday, June 5, 2024 10:58:22 AM
To: Martini, Cory <cmartini@partneresi.com>; Michael Pereira <MichaelPereira@UmpquaBank.com>
Subject: NW3393 - 503 Bella St Additional Data Requests

> You don't often get email from dunr461@ecy.wa.gov. Learn why this is important

[External Email]

[CAUTION: This email originated from outside of the company. DO NOT reply, click links or open attachments unless you verified the sender and know the content is safe.]

Hi Cory and Michael,

Thank you for the productive discussion this morning, I appreciate your diligent work on the 503 Bella St site (Site). Ecology has a few recommendations for sampling and reporting for the Site before we can issue our opinion letter.

BP1 Confirmation Sampling
Characterization soil samples collected from location BP1 in October 2023 indicated that gasoline-range petroleum hydrocarbons (TPH-G), benzene, and arsenic exceeded their respective Method A cleanup levels in this area. Confirmation soil samples collected from the limits of the excavation completed in January 2024 included analysis of TPH-G, but not benzene and arsenic. Ecology recommends collecting an additional soil sample from the BP1 area at a depth of 0.5 to 1 foot below ground surface (bgs) to confirm benzene and arsenic are not present above their respective Method A cleanup levels in this area following the remedial excavation.

Soil to Groundwater Transport Pathway Evaluation
Ecology recommends additional discussion of hydrogeology at the Site to document the likelihood of a release to groundwater at the Site:

- Discussion of depth to groundwater and inferred flow direction.
- Discussion of nearby water systems and potential impacts from Site contamination if any.
- Discussion of likelihood of groundwater impacts based on hydrogeology and nature of releases at the Site.

The following resources may be helpful for discussion of Site hydrogeology:

- Source Water Assessment Program (SWAP) Maps
- Ecology's Well Report Viewer

You may include the data and narrative in a revised RI/Cleanup Action Report, or draft a separate technical memorandum.

Additionally, before Ecology can issue you an NFA opinion for this Site, you must submit all sampling data to Ecology's Environmental Information Management (EIM) Database. Further information on submitting Site data to EIM is available on EIM's Webpage. If you require further assistance submitting data to EIM, please contact Ecology's EIM data coordinator Nicole Masurat at nicole.masurat@ecy.wa.gov.

Please let me know if you have any questions regarding these recommendations or the VCP process.

Thanks again,
David

David Unruh, LHG (he/him) | Department of Ecology | Northwest Regional Office - Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

DEPARTMENT OF ECOLOGY State of Washington

This message, including any attachments, may contain confidential and/or privileged information. If you are not the addressee or authorized to receive this for the addressee, you must not use, copy, disclose, or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by reply e-mail and delete this message. Thank you for your cooperation.