



Electronic Copy

STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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

March 11, 2025

Nicholas Bahn  
Manor Market  
3609 164th Avenue Southwest  
Lynnwood, WA 98087  
[Nick.bahn@gmail.com](mailto:Nick.bahn@gmail.com)

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

- **Site Name:** Manor Market Deli
- **Site Address:** 3609 164th St SW, Lynnwood 98087
- **Facility/Site No.:** 77492944
- **Cleanup Site ID No.:** 11939
- **VCP Project No.:** 2621

Dear Nicholas Bahn:

The Washington State Department of Ecology (Ecology) received your request for an opinion on the September 2024 *Response to Ecology Opinion Letter* for the Manor Market Deli facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), [Chapter 70A.305 RCW](#)<sup>1</sup>.

### Issue Presented and Opinion

Does the September 2024 *Response to Ecology Opinion Letter*, in addition to the associated previously submitted October 2020 *Opinion Letter Response* and April 2020 *Remedial Investigation/Feasibility Study Report*, provide sufficient information to characterize the Site and select a preferred remedial alternative?

**NO. Ecology has determined that additional information will be necessary to characterize the Site and confirm the selected remedial alternative.**

### Description of the Site

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:

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

- Gasoline-range total petroleum hydrocarbons (TPH-G) in soil and groundwater
- Benzene in soil and groundwater
- Methyl tert-butyl ether (MTBE) in soil and groundwater
- Ethylbenzene in soil
- Xylenes in soil

**Enclosure A** includes a detailed description and diagrams of the Site, as currently known to Ecology.

Please note the [Crystal Cleaners Facility 32839377 \(Cleanup Site 4572\)](#)<sup>2</sup> also affects the parcel of real property associated with this Site. This opinion does not apply to any contamination associated with the Crystal Cleaners facility.

## Basis for the Opinion

This opinion is based on the information contained in the documents listed in **Enclosure B**.

A number of these documents are accessible in electronic form from the [Site web page](#)<sup>3</sup>. The complete records are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our [Public Records Request page](#)<sup>4</sup> to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at [publicrecordsofficer@ecy.wa.gov](mailto:publicrecordsofficer@ecy.wa.gov) or 360-407-6040.

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

## Analysis and Opinion

Based on a review of the September 2024 *Response to Ecology Opinion Letter*, in addition to the associated previously submitted October 2020 *Opinion Letter Response* and April 2020 *Remedial Investigation/Feasibility Study (RI/FS) Report*, Ecology provides the following comments and recommendations:

### 1. Characterization of petroleum contamination in soil and groundwater is incomplete.

Ecology identified the following data gaps in the characterization of petroleum impacts to soil and groundwater.

If additional quarterly groundwater monitoring is completed which demonstrates stable or decreasing trends for the analytes mentioned below, an empirical demonstration may be utilized to evaluate groundwater, and additional soil characterization in these areas may not be necessary. Time series plots of groundwater data will be necessary to evaluate a stable or decreasing plume.

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<sup>2</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/4572>

<sup>3</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

<sup>4</sup> <https://ecology.wa.gov/footer-pages/public-records-requests>

- Well MW-1 and boring B-1:

A data gap exists in the characterization of MTBE and benzene in soil in the MW-1/B-1 area.

During installation of well MW-1 and boring B-1, soil samples collected at the maximum depth explored (MDE) were not analyzed for MTBE; groundwater samples from MW-1 reported MTBE above the Method A cleanup level. Soil samples at MDE were analyzed for benzene reporting above the Method A cleanup level; groundwater samples from MW-1 did not detect benzene above the Method A cleanup level.

- Well MW-2 and boring B-2:

A data gap exists in the characterization of soil in the MW-2 area and potentially to the southeast of the Site into the adjacent intersection.

During installation of well MW-2 and boring B-2 in the southeast corner of the Site, soil samples collected at MDE were not analyzed for MTBE. Groundwater samples from MW-2 reported MTBE above the Method A cleanup level.

Two borings (B-5 and B-6) were advanced to 46 and 46.5 feet bgs in the adjacent rights-of-way (ROWS) and no groundwater was encountered. The B-5 and B-6 boring data is helpful but not definitive in establishing the lateral extent of impacts originating on Site.

- Well MW-4:

A data gap exists in the characterization of MTBE and benzene in soil in the MW-4 area.

During advancement of well MW-4, the soil sample collected at MDE detected benzene and MTBE above the Method A cleanup level. Groundwater samples from MW-4 detected benzene below and MTBE above the Method A cleanup levels.

- Well MW-6:

A data gap exists in the characterization of TPH-G and benzene in groundwater in the MW-6 area and potentially to the south-southeast of the Site into the adjacent 164<sup>th</sup> Street Southwest ROW.

Groundwater samples from well MW-6, located on the south-central border of this property, detected TPH-G and benzene above the Method A cleanup levels.

- Well MW-11:

Soil sample results at 5 feet bgs which exceed Method A cleanup levels for TPH-G, benzene, ethylbenzene, and xylenes would be considered protective with a pavement cap in place pending an environmental covenant (EC). No off-property impacts are indicated in this area on the eastern border of the Site.

Groundwater sample results for well MW-11 support empirical demonstration evaluation for other Site wells as described above.

As general guidance, every sampling location should be evaluated for every contaminant of concern (COC) unless justification can be provided based on historical data.

## 2. The petroleum vapor intrusion pathway is incomplete

Data from samples of sub-slab soil vapor, groundwater, and indoor air demonstrate that vapor intrusion from the Site COCs is not a complete exposure pathway.

Sub-slab soil vapor in the Site was non-detect for benzene and naphthalene, adjacent to the indoor air sample that had exceedances of cleanup levels. The indoor air sample was collected near the unit door where outdoor air could enter the store. In addition, although the soil and groundwater samples from MW-4 (closest to the store building) exceeded the trigger levels for benzene specified in Table B-1 of the 2022 Ecology Vapor Intrusion Guidance, both of these samples are located deeper than the recommended 15-foot vertical separation distance. These lines of evidence support the absence of a petroleum VI pathway.

## 3. Cleanup Standards

### Soil:

- Cleanup Levels: MTCA Method A soil cleanup levels are appropriate for the Site. Therefore, the following soil cleanup levels apply to Site COCs:
  - TPH-G: 30 milligrams per kilogram (mg/kg)
  - Benzene: 0.03 mg/kg
  - MTBE: 0.1 mg/kg
  - Ethylbenzene: 6 mg/kg
  - Xylenes: 9 mg/kg

The Site is located in an area that qualified for exclusions from further terrestrial ecological evaluation (TEE) per [WAC 173-340-7491](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-7491)<sup>5</sup>, including the conditions that all contaminated soil is covered by physical barriers and there is less than 1.5 acres of contiguous undeveloped land on or within 500 feet of the Site. Therefore, soil cleanup levels protective of terrestrial species are not necessary for this Site.

If empirical demonstrations are feasible at specific monitoring well locations, Method B soil cleanup levels will be applicable.

- Point of Compliance: The point of compliance for soil at the Site for protection of groundwater is soils throughout the Site.

### Groundwater:

- Cleanup Levels: MTCA Method A groundwater cleanup levels are appropriate for the Site. Therefore, the following groundwater cleanup levels apply to Site COCs:
  - TPH-G: 800 micrograms per liter (µg/L)
  - Benzene: 5 µg/L
  - MTBE: 20 µg/L

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<sup>5</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-7491>



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

Ecology concurs that the selection of downgradient perimeter wells MW-10 and MW-11 are acceptable conditional points of compliance (CPOCs). The suitability of well MW-2 as a CPOC will depend on additional information as noted in Ecology's Site characterization comments above.

#### **Air:**

- **Cleanup Levels:** Based on site investigations, the vapor intrusion pathway is incomplete. Therefore, cleanup levels for air are not necessary for the site.
- **Point of Compliance:** The point of compliance for air is ambient air throughout the Site.

#### **4. Selection of Cleanup Action**

The selected remedial alternative for this Site is natural attenuation, containment, and institutional controls ("Alternative 1"), as presented in the 2020 RI/FS and reaffirmed in subsequent 2020 and 2024 supplemental reports. The viability of this selection will depend on lines of evidence provided by additional quarterly groundwater monitoring data, pending demonstration of stable and decreasing COC concentrations (see Sections 5 and 6 below).

Ecology notes that a Groundwater [Model Remedy](#)<sup>6</sup> might be applicable to this Site, in consideration of Site information available to date and pending collection of additional groundwater monitoring data. There would be no need to reevaluate the FS if the Model Remedy approach is applicable.

#### **5. Recommended Future Groundwater Monitoring**

Additional quarterly groundwater monitoring will be necessary to assess groundwater data trends, particularly from wells which have not yet reported four consecutive quarterly groundwater monitoring events with results below Method A cleanup levels for all COCs.

Production of time series plots for the following wells and COCs is recommended to demonstrate groundwater data trends, including the following:

- MTBE: wells MW-1, MW-2, MW-3, MW-4, and MW-5
- TPH-G and benzene: well MW-6

#### **6. Potential Pathway to Site No Further Action (NFA)**

Ecology recommends completion of the following steps to pursue a Site NFA determination:

- Resume quarterly groundwater monitoring utilizing all Site groundwater wells which have not reported four consecutive quarters with all COCs below Method A cleanup levels.
- Prepare time-series plots to evaluate groundwater contaminant plume status for groundwater

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<sup>6</sup> <https://apps.ecology.wa.gov/publications/documents/1609057.pdf>

monitoring wells with residual COCs exceeding Method A cleanup levels.

- Confirm all groundwater data represents a stable and decreasing plume for all COCs.
- Evaluate and confirm potential applicability of an environmental covenant (EC) and Model Remedy in coordination with VCP.
- Complete the Site NFA process in coordination with VCP, including potential drafting and recording of an EC and attaching the EC to the NFA opinion letter.

## Limitations of the Opinion

### 1. 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>7</sup>.

### 2. 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 whether the action you performed is substantially equivalent. Courts make that determination. See RCW [70A.305.080](#)<sup>8</sup> and WAC [173-340-545](#)<sup>9</sup>.

### 3. 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>10</sup>.

## 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 website: [www.ecy.wa.gov/vcp](http://www.ecy.wa.gov/vcp)<sup>11</sup>.

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<sup>7</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

<sup>8</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>9</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>10</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

<sup>11</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

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If you have any questions about this opinion, please contact me by phone at (206) 348-0638 or e-mail at [cecilia.henderson@ecy.wa.gov](mailto:cecilia.henderson@ecy.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Cecilia Henderson', with a long horizontal flourish extending to the right.

Cecilia Henderson  
VCP Site Manager  
Toxics Cleanup Program, NWRO

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

cc:      Scott Rose, AEG Atlas LLC, ([srose@aegwa.com](mailto:srose@aegwa.com))  
         Michael Chun, AEG Atlas LLC, ([mchun@aegwa.com](mailto:mchun@aegwa.com))  
         Raj Marok, Advanced Business Management, LLC (property owner) ([rajmarok@hotmail.com](mailto:rajmarok@hotmail.com))  
         NWRO VCP Coordinator, ([vcp-nwro@ecy.wa.gov](mailto:vcp-nwro@ecy.wa.gov))

## **Enclosure A**

Description, History, and Diagrams of the Site

## Site Description and History

*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 TPH-G, benzene, ethylbenzene, xylenes, and MTBE released to soil and groundwater at 3609 164<sup>th</sup> Street SW in Lynnwood, Washington (the Property, **Figures 1 and 2**). The Property encompasses the Site.

The Property is located on the northeast corner of the intersection between 164<sup>th</sup> Street Southwest and 36<sup>th</sup> Avenue West, in unincorporated Snohomish County. The Property consists of Snohomish County Parcel 00372900300502 totaling 0.75 acres in size.

### Area and Property Description

The Property is located in North Lynwood in a majority residential area. The Property is bordered by the following:

- **North:** Multi-unit residential buildings and associated paved parking area
- **East:** 36<sup>th</sup> Avenue West, beyond which is ongoing construction for 89 townhome units within 12 buildings on formerly undeveloped forest land. This construction is located on Parcel 00372900400101 comprising 4.59 acres.
- **South:** 164<sup>th</sup> Street Southwest, beyond which is a Shell-branded fuel service station located at 16404 36<sup>th</sup> Avenue West in Lynwood.

The Shell facility is listed on the Contaminated Sites List (CSL) as the former Unocal 5533 Facility (Cleanup Site 10391, Facility Site 74865182), and is enrolled in the Pollution Liability Insurance Agency (PLIA) Technical Assistance Program (TAP) as Project PNW2603. This facility has been operating as a fuel service station between approximately 1929 and the present. The facility is contaminated with petroleum hydrocarbons in soil and groundwater.

- **West:** Multi-unit residential buildings and associated paved parking area

The locations of these nearby properties are depicted on **Figure 2**.

### Property History and Current Use

Beginning on an unknown date through 1982, the Property was utilized for farmland. In 1982, the current Property building was constructed.

The Property is developed with a 7,000 square-foot, one-story, rectangular multi-tenant retail building (i.e. strip mall). Manor Market Deli occupies Unit A on the eastern end of the Property building. Manor Market Deli includes a convenience store within the strip mall building and associated retail fuel service station dispenser canopy and three pump islands in the southeast portion of the Property. The Property layout is depicted in **Figure 2**.

The western portion of the Property building currently includes the commercial businesses Shoe Repair & Alteration, Wow Teriyaki, and Zen Salon. A vacant standalone espresso stand is located in the southwest corner of the Property, formerly occupied by Java Hut and Zip Locksmith.

Between 1991 and approximately 2020, Unit D on the western end of the Property strip mall was occupied by Crystal Cleaners, a dry-cleaning facility listed on the CSL as Cleanup Site ID 4572 and associated with the release of chlorinated solvents to soil. Crystal Cleaners received an No Further Action (NFA) determination with a Restrictive Covenant from Ecology in 1999 and is subject to periodic reviews every 5 years. The former Crystal Cleaners Unit D location is currently occupied by Shoe Repair & Alteration.

### **Sources of Contamination**

The source of petroleum hydrocarbons at the Site is associated with historical fuel service station operations in the eastern area of the Property.

In 1998, petroleum hydrocarbon contamination in soil was first reported during decommissioning of three former 12,000-gallon single-walled gasoline underground storage tanks (USTs) and associated fuel equipment (previously installed in 1982). The former USTs were replaced in the same location with the current two 10,000-gallon double-walled steel tanks, as well as new dispensers and piping (**Figure 2**). One of the current USTs is a dual compartment (4,000- and 6,000-gallon compartments) which hold mid- and premium-grade gasoline. The other 10,000-gallon UST holds regular-grade gasoline. The UST system is registered with Ecology as UST ID 233.

### **Physiographic Setting**

The Site is located in south Snohomish County within the Puget Sound Lowland, an elongated (north-south) basin situated between the Cascade Mountains on the east and the Olympic Mountains on the west. The elevation of the Site is approximately 610 feet above mean sea level. Land surface on the Site slopes towards the east-northeast.

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

The nearest surface water body to the Site is Box Spring Creek which is located approximately 470 feet east of the Site. Lake Serene and Swamp Creek are located approximately 0.75 miles north and east of the Site, respectively.

The Site is primarily covered with impervious asphalt and concrete. Storm water runoff on and in the vicinity of the Site disperses via sheet flow to catch basins connected to the Snohomish County storm water system.

### **Ecological Setting**

Land surfaces on the Site and adjacent properties are primarily covered by buildings and impervious asphalt or concrete pavement. An undeveloped greenbelt comprising approximately 4.6 acres of forested land was formerly located approximately 100 feet east of the Site across 36<sup>th</sup> Avenue West; this area has since been deforested and is under construction for townhomes as of early 2024.

### **Geology**

The [geologic map of the area](https://pubs.usgs.gov/publication/mf1541)<sup>12</sup> indicates the Site is underlain by Vashon Till, a dense glacial till consisting of an unsorted mixture of varying amounts of sand, silt, gravel, cobbles, and boulders.

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<sup>12</sup> <https://pubs.usgs.gov/publication/mf1541>

Based on borings advanced on the Site, shallow silty and gravelly sands and fill material are present at depths to 5 feet below ground surface (bgs) in central areas of the Site. These materials are underlain by dense silt mixed with fine sand and clay to the maximum depth explored of 46 feet bgs (**Figure 3**). At depths of approximately 25 to 30 feet bgs, fine to coarse sand and gravel were encountered below the till, which are most likely advance glacial outwash deposits.

### **Groundwater**

Eleven groundwater monitoring wells (MW-1 through MW-11) are currently present at the Site, installed between 2012 and 2016 (**Figure 2**). Monitoring wells are screened between 20 and 35 feet bgs.

Groundwater has been measured in Site monitoring wells at depths between approximately 10 and 33 feet bgs; groundwater depth at individual wells fluctuates up to approximately 3 feet.

In October 2023, borings installed up to 46 feet bgs in the northern and western areas of the Site and in the adjacent 164<sup>th</sup> Street Southwest and 36<sup>th</sup> Avenue West ROWs did not encounter groundwater at the time of drilling. No wells were installed in these borings. The absence of groundwater is likely due to decommissioning of the borings prior to allowance of groundwater to enter the boreholes and stabilize.

Based on the groundwater elevation measurements in Site monitoring wells, groundwater flows generally to the east (**Figure 4**). Groundwater elevation measurements in the south-adjacent Unocal 5533 facility indicated groundwater flow ranging from southeast to northeast.

### **Water Supply**

The Site area is supplied with drinking water from the Alderwood Water and Wastewater District which receives treated and filtered water from the City of Everett. Everett's raw water supply originates from the Spada Reservoir created by Culmback Dam on the Sultan River approximately 25 miles east of Everett. According to Ecology's well log database, no water supply wells are located within 0.25 mile of the Site.

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

#### Soil:

In 1998, petroleum contaminated soil (PCS) was encountered during removal of three former USTs and related fuel dispensing equipment. Approximately 1,000 tons of PCS were excavated to a depth of 12 ft bgs. Soil samples collected from excavated soil stockpiles reported concentrations of benzene and TPH-G exceeding then-MTCA Method A cleanup levels. Confirmation soil samples were collected from the UST basin, dispenser, and piping areas. Two soil samples from within the former UST excavation area (one bottom and one sidewall) contained benzene exceeding the MTCA Method A cleanup level.

Between 2011 and 2016, additional subsurface investigation activities were completed including advancement of a total of 20 soil borings, 11 of which were completed as permanent groundwater monitoring wells. Soil sample results reported concentrations of TPH-G, BTEX, and MTBE exceeding MTCA Method A cleanup levels, between approximately 5 and 31 feet bgs in areas northeast-adjacent and south-adjacent to the dispenser canopy.

In October 2023, four additional soil borings (B-5 through B-8) were advanced to 46 feet bgs in four locations (**Figure 2**): in the 164<sup>th</sup> Street ROW south-adjacent to the Site, in the 36<sup>th</sup> Avenue West ROW east-adjacent to the Site, in the north-central Site area adjacent to the northern Property border, and in the west-central of the Site near the Property espresso stand. No petroleum constituents were detected in soil samples at concentrations exceeding laboratory detections limits.

Site areas where residual soil concentrations of petroleum hydrocarbons exceed current MTCA Method A cleanup levels are shown on **Figure 2**.

#### Groundwater:

In January 1998, approximately 2,800 gallons of groundwater were pumped out of the UST basin excavation area following removal of the former USTs. No known groundwater samples were collected.

In 2011, during subsurface investigation activities, groundwater was encountered in only the deepest of four soil borings (B-1) at 23-24 feet bgs. A grab ground water sample collected from this boring contained TPH-G and benzene exceeding Method A cleanup levels.

Between 2012 and 2016, 11 permanent groundwater monitoring wells were installed on the Site. Groundwater monitoring was completed on an annual to quarterly basis between 2012 and 2023. Concentrations of TPH-G, benzene, MTBE, and total lead were reported in concentrations exceeding MTCA Method A cleanup levels.

In May 2012, an oxygen release compound (ORC) filter sock was installed in monitoring well MW-1 from a depth of 19 to 34 feet bgs in an effort to treat ground water impacts. The filter sock was removed approximately 1 year later due to lack of significant impact on benzene concentrations in groundwater samples collected from the well.

Between July 2023 and April 2024, four quarterly groundwater monitoring events were completed in sequence. Concentrations of TPH-G, benzene, and/or MTBE were reported in groundwater exceeding MTCA Method A cleanup levels in at least one of the quarterly events in wells MW-1, MW-2, MW-3, MW-4, and MW-6 located in the eastern area of the Site (**Figure 5**). Ecology notes that additional groundwater exceedances were identified after the Figure 5 plume map was prepared (MTBE in MW-2 and MW-3).

#### Vapor Intrusion:

In May 2018, November 2019, and October 2023, vapor intrusion evaluation was completed on Site including collection of sub-slab, indoor air, and ambient air samples.

Indoor air samples collected in the Site unit in 2023 detected benzene and naphthalene exceeding the MTCA Method B screening levels for commercial workers, after adjustment for ambient/outdoor air concentrations.

A sub-slab soil gas sample collected in 2018 detected benzene exceeding the MTCA Method B screening level for commercial workers; subsequent samples were below MTCA Method B screening levels for benzene. The 2018 benzene sample was collected using different sampling materials than the subsequent soil gas samples on Site.

Sub-slab soil vapor in the market building was non-detect for benzene and naphthalene in the most recent two sampling events, adjacent to the indoor air sample that had exceedances of cleanup levels. The indoor air samples were collected near the deli door where outdoor air could enter the store. In addition, although the soil and groundwater samples from MW-4 (closest to the store building) exceeded the trigger levels for benzene specified in Table B-1 of the [2022 Ecology Vapor Intrusion Guidance](https://apps.ecology.wa.gov/publications/SummaryPages/0909047.html)<sup>13</sup>, both of these samples are located deeper than the recommended 15-foot vertical separation distance. These lines of evidence support the absence of a petroleum VI pathway.

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<sup>13</sup><https://apps.ecology.wa.gov/publications/SummaryPages/0909047.html>



## Site Diagrams

FILENAME	DRAWN BY	CHECKED BY	APPROVED BY	PROJECT NUMBER
11-124_1602.DWG	ICD 5/9/2016	DB 5/9/2016	DB 5/9/2016	11-124



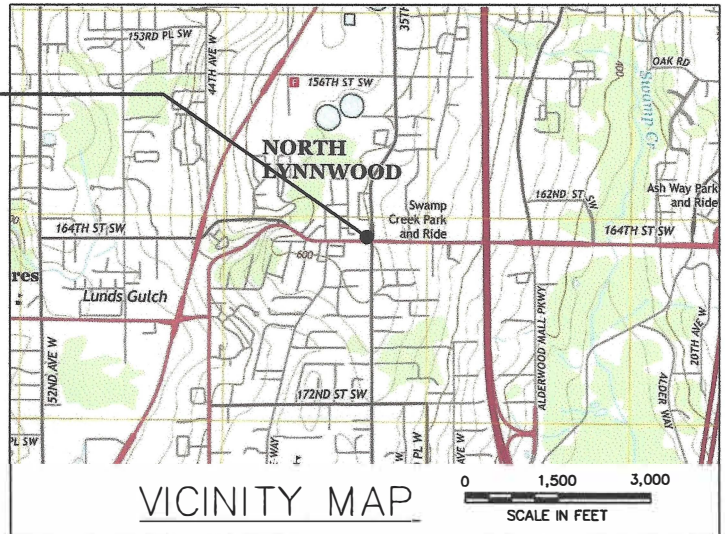
## NOTES

1. THE LOCATIONS OF ALL FEATURES SHOWN ARE APPROXIMATE
2. THIS DRAWING IS FOR INFORMATION PURPOSES. IT IS INTENDED TO ASSIST IN SHOWING FEATURES DISCUSSED IN AN ATTACHED DOCUMENT.

## REFERENCE

DRAWING CREATED FROM AERIAL PHOTOGRAPH AND NOTES PROVIDED BY AEG, LLC.  
VICINITY IMAGE SOURCE: U.S. GEOLOGICAL SURVEY-2014, 7.5 MINUTE QUADRANGLE MAP EDMONDS EAST, WASHINGTON

PROJECT LOCATION



Enclosure A, Figure 1





Enclosure A, Figure 2





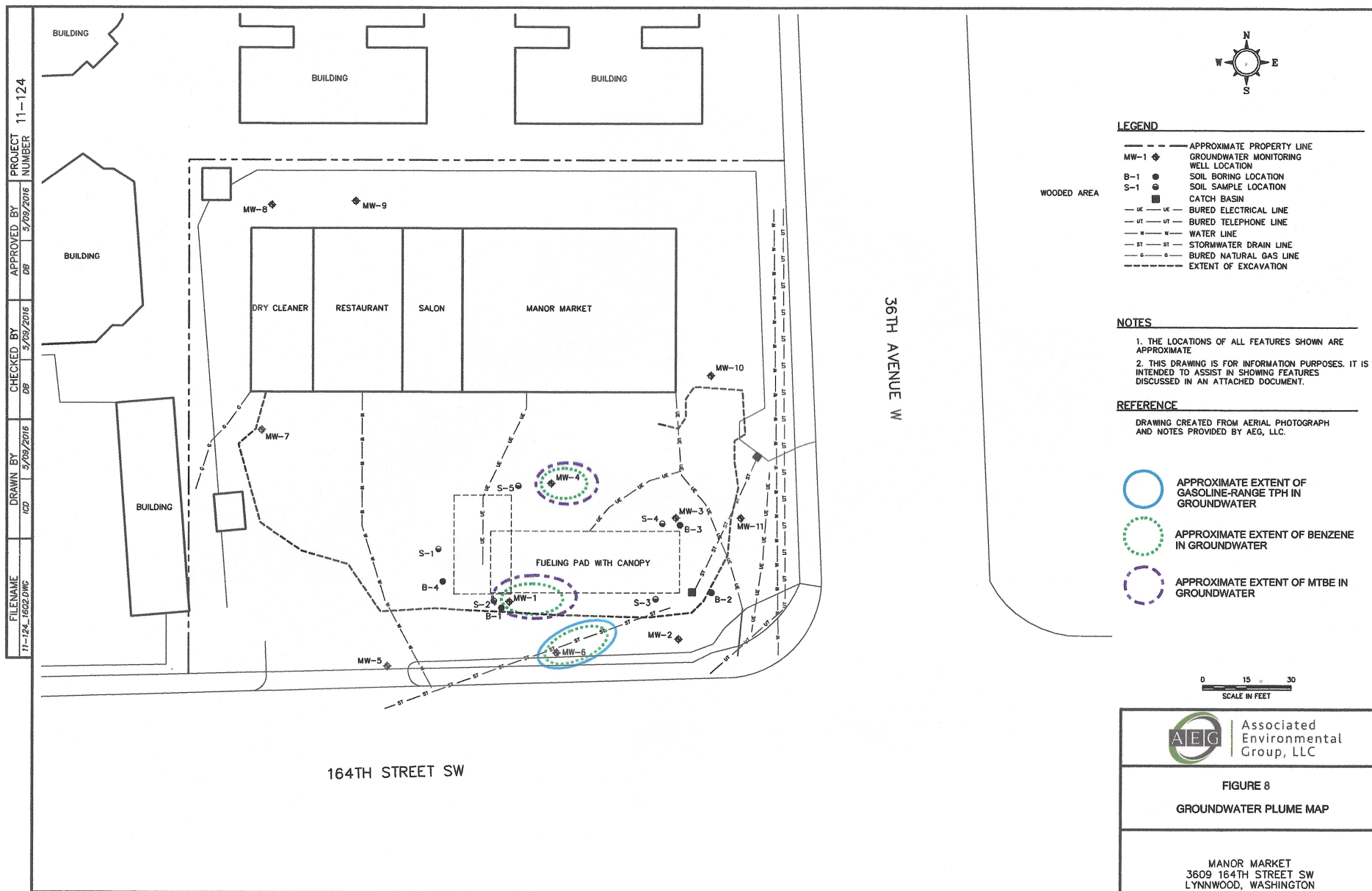
MANOR MARKET  
3609 164TH STREET SW  
LYNNWOOD, WASHINGTON





Enclosure A, Figure 4





Enclosure A, Figure 5

## **Enclosure B**

Basis for the Opinion: List of Documents

## Basis for the Opinion: List of Documents

1. AEG Atlas, LLC (AEG Atlas). *Response to Ecology Opinion Letter*. September 18, 2024.
2. Department of Ecology (Ecology). *Opinion on Proposed Remedial Action, Manor Market Deli, VCP NW 2621*. August 26, 2020.
3. Associated Environmental Group, LLC (AEG). *Remedial Investigation / Feasibility Study, Manor Market, 3609 – 164<sup>th</sup> Street SW, Lynwood Washington 98087*. April 29, 2020.
4. Ecology. *Opinion on Proposed Remedial Action, Manor Market Deli, VCP NW 2621*. September 12, 2019.
5. AEG. *Remedial Investigation Addendum & Opinion Letter Response, Work Plan and Request for Opinion, Manor Market, 3609 - 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. April 5, 2019.
6. AEG. *Phase II Environmental Site Assessment, Spruce Market, 16404 - 36<sup>th</sup> Avenue West Lynnwood, Washington 98036*. August 23, 2018.
7. Ecology. *Opinion on Proposed Remedial Action, Manor Market Deli, VCP NW 2621*. December 29, 2017.
8. AEG. *Work Plan and Request for Opinion, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. October 27, 2017.
9. Ecology. *Opinion on Proposed Remedial Action, Manor Market Deli, VCP NW 2621*. July 3, 2017.
10. AEG. *Remedial Investigation/Model Remedy Review Request, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. December 29, 2016.
11. Ecology. *Opinion on Proposed Remedial Action, Manor Market Deli, VCP NW 2621*. August 28, 2013.
12. AEG. *Supplemental Remedial Investigation – 3<sup>rd</sup> Phase Workplan, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. June 10, 2013.
13. AEG. *Supplemental Remedial Investigation – 2<sup>nd</sup> Phase, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. April 5, 2012.
14. AEG. *Supplemental Site Characterization, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. September 14, 2011.
15. Envitech, LLC (Envitech). *Phase II Environmental Site Assessment, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. April 26, 2011.
16. Envitech. *Phase I Environmental Site Assessment, Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA 98087*. November 8, 2010.
17. Environmental Associates, Inc. (EAI). *Limited Subsurface Sampling & Testing, The Manor Market, 3609 164<sup>th</sup> Street Southwest, Lynnwood, Washington*. November 1998.
18. Robert M. Rodman. *Site Characterization, Crystal Cleaners, Unit D, 3609 164<sup>th</sup> St. S.W., Lynnwood, Washington*. November 1998.
19. Quest Environmental Services Team, Inc (QUEST). *Results of Underground Storage Tank Removal and Site Remediation Program at Manor Market, 3609 164<sup>th</sup> St. SW, Lynnwood, WA*. February 6, 1998.