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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

April 10, 2025

Josh Edelstein
Sunset Commons, LLC
2200 Division Street, Suite E
Bellingham, WA 98226
(josh@greenbriarhomes.net)

Re: No Further Action opinion for the following contaminated Site

Site name:	WA DOT Bellingham Maintenance
Site address:	512 E Sunset Drive, Bellingham, WA 98225
Facility/Site ID:	84242359
Cleanup Site ID:	10727
VCP Project No.:	NW3385

Dear Josh Edelstein:

The Washington State Department of Ecology (Ecology) received your request on July 5, 2024 for an opinion regarding the sufficiency of your independent cleanup of the WA DOT Bellingham Maintenance facility (Site) under the Voluntary Cleanup Program (VCP).[1] To provide an opinion, we requested additional information from you in writing on October 8, 2024. We received the additional information on December 6, 2024. 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.[2]

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[3] (collectively called "MTCA").

[1] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305
[3] 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 releases:

- Diesel-, oil-, and gasoline-range total petroleum hydrocarbons (TPH-D, TPH-O, and TPH-G, respectively); benzene; naphthalenes; tetrachloroethene (PCE); trichloroethene (TCE); and lead in soil; and
- TCE in groundwater.

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

Please note that releases from multiple sites can affect a parcel of real property. At this time, Ecology has no information that other sites affect the parcels associated with this Site.

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.[4] 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.[5]

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. Investigations completed from 1990 to 2023 documented the lateral and vertical extent of impacts to soil and groundwater at the Site. Enclosure A describes the Site.

Setting cleanup standards

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

Cleanup Levels

Soil

MTCA Method A soil cleanup levels for unrestricted land uses were selected for the Site. MTCA Method A soil cleanup levels based on protection of groundwater are appropriate.

[4] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests

[5] https://apps.ecology.wa.gov/cleanupsearch/site/10727

The Site is located in an area with limited terrestrial habitat and qualified for a Terrestrial Ecological Evaluation (TEE) exclusion, based on WAC 173-340-7491(1)(c)(i). There are less than 1.5 acres of contiguous undeveloped land on the Site or within 500 feet of any area of the Site. Land use at the Site and surrounding area makes substantial wildlife exposure unlikely. Therefore, cleanup levels protective of terrestrial species are not needed at this Site. The TEE exclusion was documented in the *Terrestrial Ecological Evaluation Form,* included with the *Cleanup Action Report* dated July 3, 2024.

Groundwater

MTCA Method A cleanup levels are protective of potable use and are therefore appropriate for the site. The highest beneficial use for groundwater is considered to be as a potable source, unless it can be demonstrated that groundwater is non-potable.

Points of Compliance

Soil

The point of compliance for soil at the Site for protection of groundwater is soils throughout the Site.

Groundwater

The 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 which 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 selected cleanup action for the Site consisted of the following elements:

- Removal of underground storage tanks (USTs) that previously contained leaded gasoline, diesel, waste oil, and heating oil;
- Removal of contaminated soil associated with the following sources:
    - Hydraulic lift;
    - Old Gas House;
    - Building 1; and
    - Vehicle and parts washing operation.
- Excavation and off-Site disposal of contaminated soil encountered during targeted excavation activities and as a part of Site redevelopment; and
- Removal and authorized discharge of perched groundwater encountered during excavation activities.

Implementing the cleanup action

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

- Removal of a 2,000-gallon waste oil UST and a 2,500-gallon diesel UST in 1990, a 1,000-gallon mixed oil UST in 1994, and two 5,000-gallon USTs (unleaded gasoline and diesel) in 1995;

- Excavation and off-Site disposal of approximately 6,262 cubic yards of petroleum-contaminated soil (PCS): 510 cubic yards from UST removal activities (1990–1995), 1,448 cubic yards from independent remedial actions (1997–1998), and 4,304 cubic yards from remedial actions (2023);
- Excavation and off-Site disposal of approximately 4,809 cubic yards of TCE-contaminated soil (associated with the former vehicle parts washing operation) removed during property redevelopment in 2023;
- Removal and off-Site disposal of approximately 800 gallons of perched groundwater in 1995 and 21,884 gallons of groundwater managed as hazardous waste during 2023 TCE excavation activities;
- Collection of performance and confirmation soil samples from test borings, test pits, and the excavation floor, to document cleanup of soils to MTCA cleanup levels; and
- Collection of confirmation groundwater samples to document cleanup of groundwater to MTCA cleanup levels.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from the Contaminated Sites List and the 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).[6]

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[7] and WAC 173-340-545.[8]

[6] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040

[7] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080

[8] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545

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).[9]

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3385.

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me at 425-725-0398 or Andrew.weinrich@ecy.wa.gov.

Sincerely,

Andrew Weinrich
Site Manager
Toxics Cleanup Program, NWRO

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

cc: Thom Davis, ALL4 Inc. (tdavis@all4inc.com)
Ecology VCP Fiscal Analyst (ecyrevcp@ecy.wa.gov)
Ecology VCP Coordinator (David.unruh@ecy.wa.gov)

[9] 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 opinions expressed in the body of the letter.

Site:

The Site is defined by releases of the following at 512 East Sunset Drive in Bellingham, Whatcom County, Washington (Figure 1):

- Diesel-, oil-, and gasoline-range total petroleum hydrocarbons (TPH-D, TPH-O, and TPH-G, respectively); benzene; naphthalenes; tetrachloroethene (PCE); trichloroethene (TCE); and lead in soil; and
- TCE in groundwater.

The Site is located on the south side of E Sunset Drive between Ellis Street to the west, James Street to the east, and E Illinois Street on the south (Figure 1). The Property consists of four rectangular-shaped Whatcom County tax parcels totaling 4.05 acres in area with the following parcel numbers:

- 3803194593460000 (512 E Sunset Drive)
- 3803194753480000 (E Sunset Drive)
- 3803194603210000 (E Illinois Street)
- 3803194753210000 (519 E Illinois Street)

Area and Property Description:

The Site is located in a residential area in Bellingham. The Property is currently being redeveloped for residential uses. The Property is bounded by the following:

- North: E Sunset Drive, with single-family residences beyond;
- East: Single-family residences, with a church and James Street beyond;
- South: E Illinois Street, with single-family residences beyond; and
- West: A church and single-family residences, with Ellis Street beyond.

Property History and Current Use:

The Property was first developed prior to 1950 as a maintenance facility for the Washington State Department of Transportation (WSDOT) (Figure 2, Figure 3). The Property was utilized for vehicle maintenance and equipment storage. Over time the developed Property included seven buildings, five underground storage tanks (USTs), a hydraulic lift, and a steam-cleaning pad to support operations.

In 1995, a fire occurred which destroyed the maintenance building (Building 6), after which it was never rebuilt. Building 1 was removed in 1998 during remedial activities and Building 2 was removed in 2006 when WSDOT sold the Property. The Property is currently being redeveloped into single-family residential properties (Figure 4). As of September 2024, utility installation, street paving, and erection of three houses had been completed on the Property.

Sources of Contamination:

The source of TPH-D, TPH-O, and TPH-G contamination at the Site is associated with the historical operation of five USTs by WSDOT (Figure 3):

- 2,000-gallon waste oil UST (Tank ID 66A04001), installed 12/31/1964 and removed 8/30/1990;
- 2,500-gallon diesel UST (Tank ID 66A01003), installed 1/1/1967 and removed 12/5/1990;
- 5,000-gallon diesel UST (Tank ID 66A02010), installed 6/1/1977 and removed 3/8/1995;
- 5,000-gallon gasoline UST (Tank ID 66A02011), installed 6/1/1977 and removed 3/8/1995; and
- 1,000-gallon heating oil UST (unregulated), installed at an unknown date and removed 1/31/1994.

The waste oil UST was located at the northwest corner of Building 6 in the same area as a historical oil-dumping station. A site assessment was performed during the removal of this tank and identified contamination; however, additional records detailing the contamination were not available. A release from the 2,500-gallon diesel UST was identified when it was removed in December 1990. Another release was associated with the unregulated heating oil UST and discovered during the removal of the tank.

The two 5,000-gallon USTs containing diesel and gasoline were associated with a fueling station on the Property. During the removal of the 5,000-gallon tanks, a release was discovered and followed by the removal of 800-gallons of perched groundwater and excavation of 200-cubic yards of gasoline-impacted soil. Additionally, a release of hydraulic fluid associated with the on-site hydraulic lift was identified in the footprint of Building 6.

The source of TCE contamination in soil is associated with the historical operations of a vehicle and parts washing bay by WSDOT.

Physiographic Setting:

The Site is located within the Puget Sound Lowland Physiographic Province, a north-south trending structural and topographic depression that is bordered on its west by the Olympic Mountains and on the east by the Cascade Mountain foothills. The Puget Sound Lowland is underlain by Tertiary volcanic and sedimentary bedrock and has been filled to the present-day land surface with Pleistocene-aged glacial and nonglacial sediments.

Repeated advances and retreats of the continental glaciers that flowed through the area out of Canada more than 10,000 years ago created the low undulating plains that are characteristic of the Puget Sound Lowland. Current land surfaces reflect the changes that are directly related to the most recent glacial advance and retreat through Snohomish County, known as the Vashon Stade of the Fraser Glaciation.

Land surface elevation of the Site is approximately 160 feet above mean sea level. Topography of the area is flat and slopes gently to the west and southwest.

Surface/Stormwater System:

Stormwater runoff on and in the vicinity of the Property disperses via sheet flow to catch basins connected to the City of Bellingham stormwater system. The closest surface water bodies are Squalicum Creek, Bug Lake, and Sunset Pond, located approximately 2,100 feet north of the Site.

Ecological Setting:

The Site is zoned for residential use. Adjoining properties to the north, south, east, and west are also zoned for residential use. Land surface on the Property is undergoing development with the construction of concrete foundations for single-family residential properties. Land surfaces on the adjacent parcels are partially covered by residential homes, with moderate yard space, landscaped areas, and tree cover.

Geology:

The geologic map of the area indicates the Site is underlain by Vashon Till, a dense diamict with varying amounts of sand, silt, and gravel. Boring logs for explorations completed at the Site encountered sandy gravel fill to a maximum depth of approximately 3 feet below ground surface (bgs). The sandy gravel is underlain by silty sand to a depth of approximately 16 feet bgs, interpreted to be Vashon Till. Silty clay was present below the till deposits (Figure 6, Figure 8, Figure 10) to the maximum depth of 25 feet bgs explored at the Site.

Groundwater:

Shallow groundwater was encountered intermittently in borings and excavations completed at the Site. Four monitoring wells (MW-1 through MW-4) were installed at the Site in December 2022 (Figure 4). One dewatering well was formerly present at the southern end of the property in the footprint of the on-Property TCE excavation zone. The dewatering well was purged and sampled prior to the on-property TCE excavation.

Depth to groundwater was measured for MW-1 through MW-4 in December 2022, February 2023, and May 2023. Groundwater was encountered in MW-1 through MW-4 at depths of approximately 9 to 21 feet bgs in December 2023 and 5 to 8 feet bgs in February 2023. The highly variable depths to groundwater and intermittent groundwater occurrence did not allow determination of a shallow groundwater flow direction.

Water Supply:

Drinking water at the Property is supplied by the City of Bellingham. The City of Bellingham sources its drinking water from Lake Whatcom, located approximately 2.25 miles east of the Site. The nearest wellhead protection zones for public water supply wells are located approximately 2 miles southwest and 2 miles northeast of the Site.

Release and Extent of Contamination:

Site conditions prior to remedial actions

Soil

Between July 2022 and June 2023, multiple test pits and soil borings were completed on the Property during utility installation and site preparation work to assess potential contamination. Initial findings from six test pits revealed petroleum-contaminated soil (PCS) in the southwest section of the Property, with contaminants including gasoline, diesel, and oil, along with benzene, lead, and other chemicals exceeding MTCA Cleanup Levels. Additional contaminated areas (soil samples PCS-3 to PCS-9 and PCS-12 to PCS-14) were discovered during further grading and infrastructure work, leading to ongoing assessments and soil sampling.

In October 2022, 25 soil borings were drilled across the site, targeting areas of historical excavations and former UST locations. These borings identified additional petroleum contamination near former USTs and TCE contamination near the southern Property boundary. Site delineation continued into early 2023, with 31 more borings drilled to determine the extent of the TCE plume, which extended off-Property into the Illinois Street

right-of-way. The TCE contamination was linked to historical operations of a vehicle and parts washing bay by WSDOT.

The 2022 field work included 181 soil samples collected from shallow surface soil locations, test pits, and soil borings. Of these samples, 43 exceeded the MTCA Method A cleanup levels, primarily detecting gasoline, diesel, oil, benzene, lead, and cPAHs. No PCBs or pesticides were found, and aside from lead, no other metals exceeded cleanup levels.

Groundwater

Groundwater samples were collected once from temporary wells B-1 through B-5 in October 2022. A sample from temporary well B-5 contained TPH-D exceeding the MTCA Method A cleanup level, while no contaminants exceeded cleanup levels in other borings.

Monitoring wells MW-1 through MW-4 were installed in December 2022, with MW-2 placed near B-5 to validate its results. Three quarterly sampling events were completed using monitoring wells MW-1 through MW-4. After further sampling in December 2022, February 2023, and May 2023, no contaminants of concern were found exceeding groundwater cleanup levels in the southern portion of the Property. Groundwater at the Site is considered to be fully characterized.

Interim Remedial Actions and Monitoring

1990 Underground Storage Tank Removals

From August to December 1990, a 2,500-gallon diesel UST and a 2,000-gallon waste oil UST were removed from the Site prior to additional excavation and stockpiling of contaminated soils. Approximately 100 cubic yards of diesel-contaminated soils were excavated and stockpiled on-site. Confirmation samples collected after the excavation indicated the remaining presence of diesel contamination in soil. The excavation area was backfilled and stockpiled soils were transported off-Site for disposal.

1994 Underground Storage Tank Removal and Excavation

In February 1994, a 1,000-gallon heating oil UST was removed from the northern portion of the Site near Sunset Drive after the adjacent building (Building 6) had burned down. At the time of the tank removal, it was estimated the tank contained approximately 700 gallons of mixed oil and water. The tank was pumped, rinsed, and removed. Upon removal, it was apparent the tank had been leaking. Approximately 210 cubic yards of PCS were removed during the excavation, which extended to 9 feet bgs (Figure 11, Figure 12). Groundwater was not encountered. Confirmation samples indicated the contamination had been removed and the area was backfilled with imported clean material.

1995 Underground Storage Tank Removal

In March 1995, one 5,000-gallon unleaded gasoline UST and one 5,000-gallon diesel UST were removed from the Site. The USTs were constructed of steel and had been installed in 1977. Corrosion was present on the top third of both USTs and a strong petroleum smell was observed near the fill-end of the diesel UST. During the tank removals, approximately 800 gallons of perched groundwater was pumped into a pump truck and disposed off-Site. Approximately 200 cubic yards of PCS was excavated from the tank removal areas. The soil was stockpiled at the Site and the excavation areas were lined prior to backfilling with imported clean material.

1997 – 1998 Independent Remedial Action Excavations

In October 1997, an independent remedial action was taken at the Site which included excavations in the areas of an old hydraulic lift (in the footprint of Building 6, which burned down in 1995) and an old gas house (adjacent to Building 1), to address gasoline-contaminated soils (Figure 7, Figure 9). Soils around the hydraulic

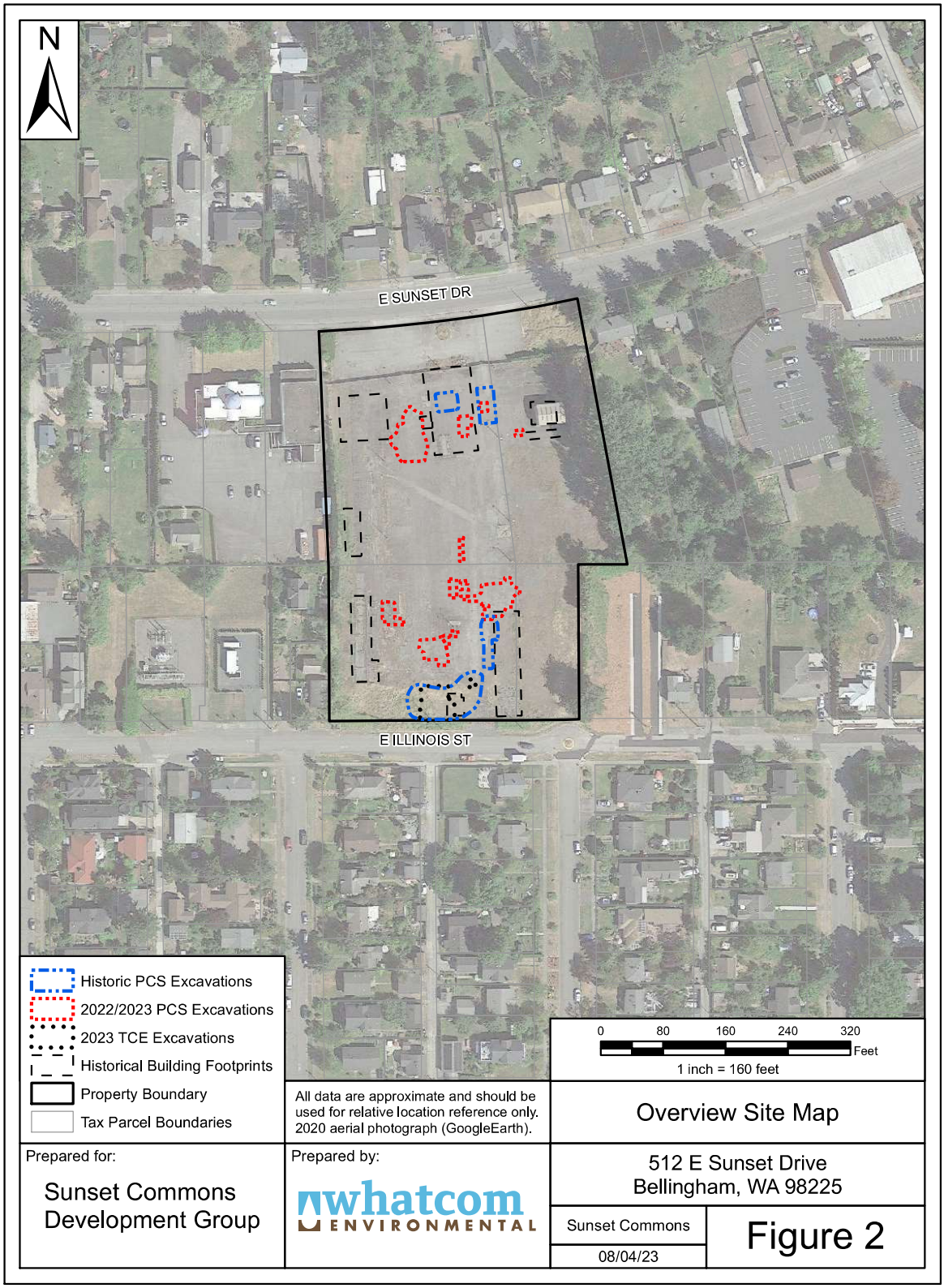
lift were excavated to a depth of approximately 9 feet bgs, removing approximately 30 cubic yards of soil contaminated with hydraulic fluid.

Approximately 100 cubic yards of gasoline contaminated soil were excavated from the area adjacent to Building 1 to a depth of approximately 8 feet bgs (Figure 9). Gasoline was present in the sidewalls of the excavation near Building 1, and an additional 1,000 cubic yards of PCS were removed. In March 1998, independent remedial actions continued with two separate excavations in the area adjacent to and inside Building 1. The two excavations totaled 308 cubic yards of PCS. Building 1 was demolished to allow for further excavation. Confirmation samples were collected to show that soil contaminant concentrations were below MTCA cleanup levels. The soil was moved off-Site and used for WSDOT highway right-of-way projects.

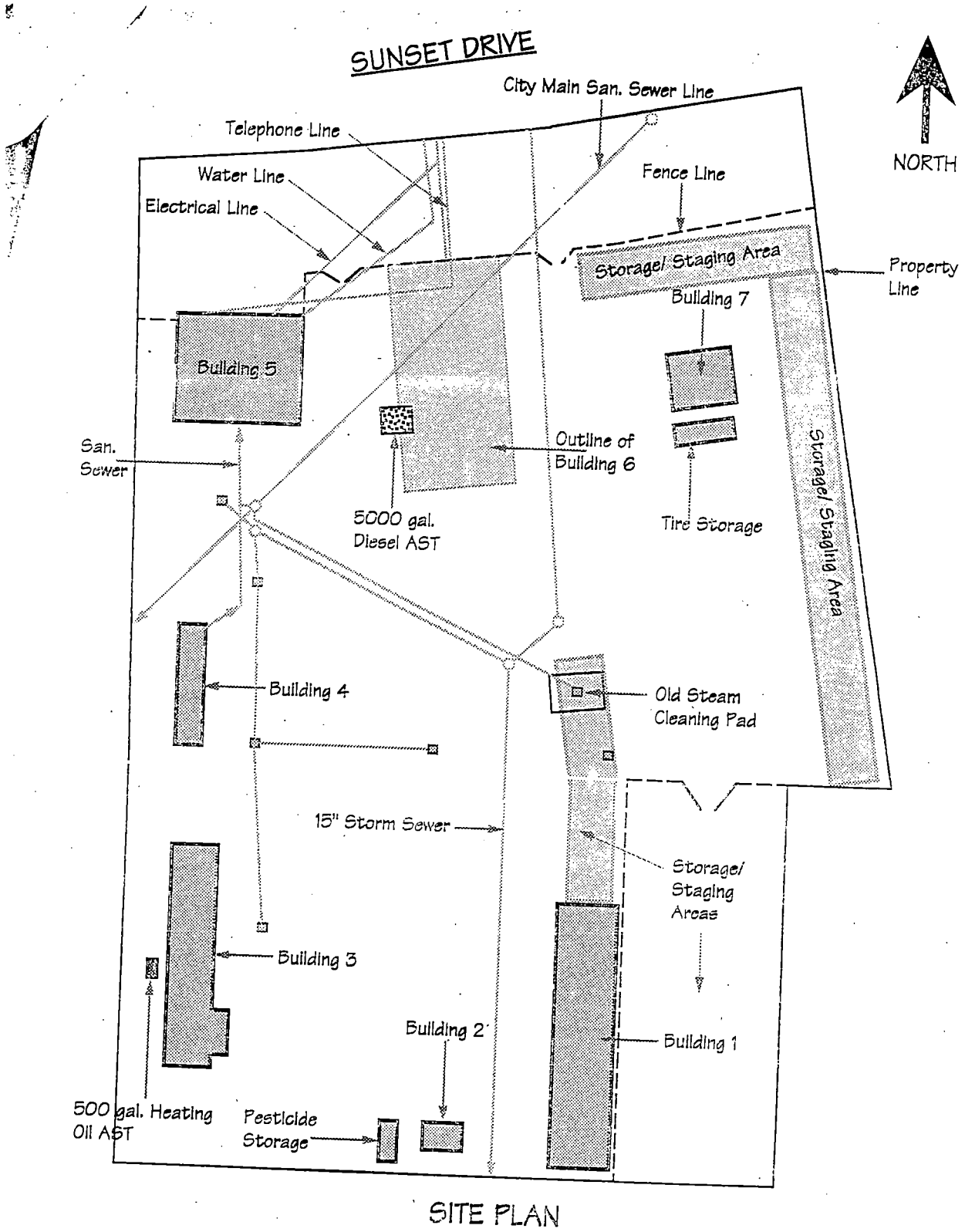
2023 – 2024 TCE Soil Excavation

A TCE soil excavation was conducted in two phases to address contamination both on- and off-Property. The first phase (May 2023) involved excavating TCE-contaminated soil within the Property boundaries, while the second phase, from September to November 2023) targeted soil in the footprint of and south of Illinois Street (Figure 5). A mobile laboratory was used to analyze soil samples on-Site to guide the excavations. In total, approximately 13,670 tons of TCE-contaminated soil were excavated and transported for disposal. Additionally, 21,884 gallons of water from the excavation area were pumped, managed as hazardous waste, and transported for disposal at a permitted off-Site facility. All confirmation soil samples collected from the final edges of the excavation met the MTCA Method A cleanup levels for TCE and all petroleum contaminants.

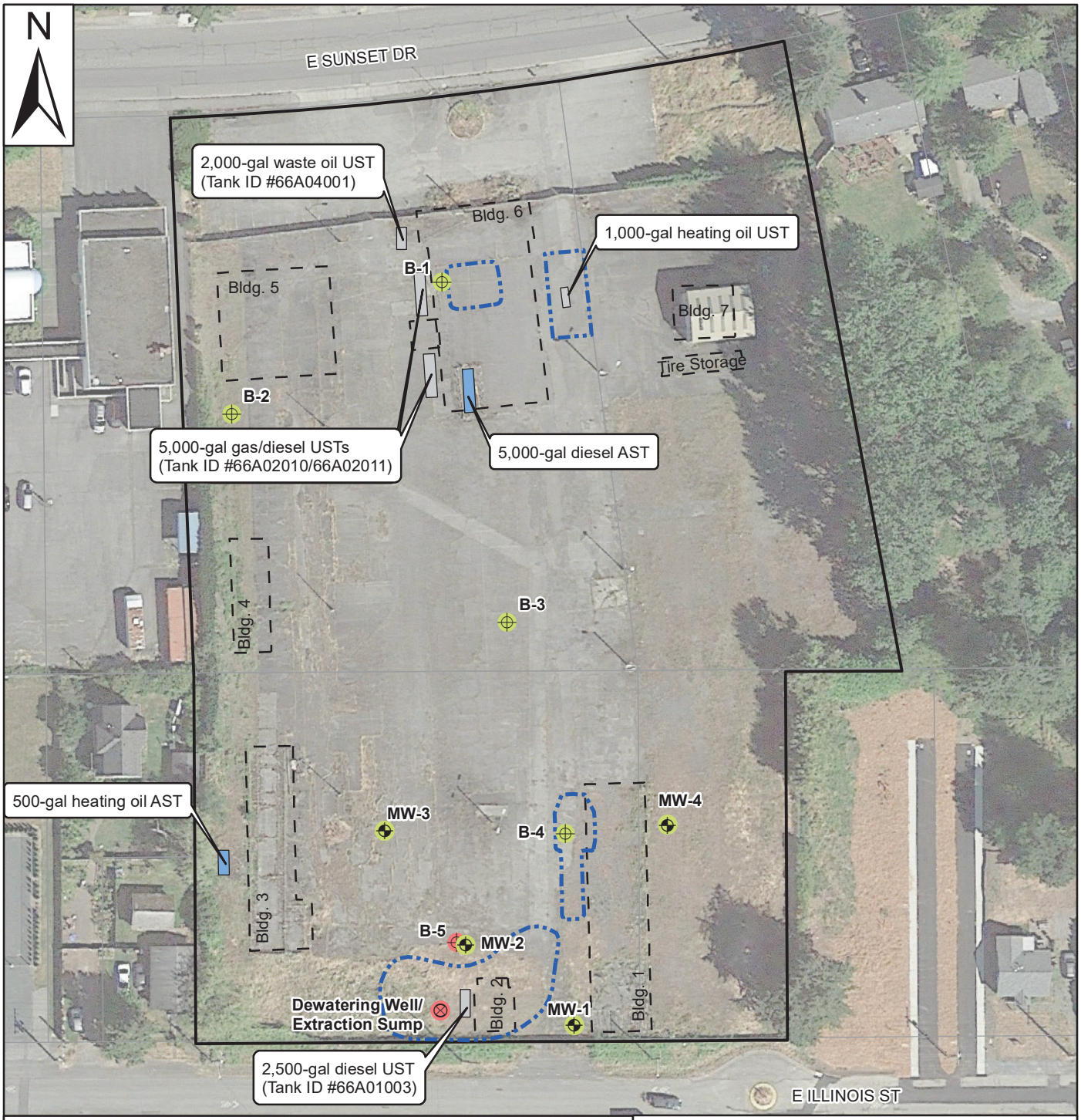
Enclosure A, Figure 1



Enclosure A, Figure 2



Enclosure A, Figure 3



Former Dewatering Well
Temporary Well Location
Monitoring Well Location
Result Exceeded MTCA A
Result Met MTCA A
Historic UST Locations
Historic PCS Excavations
Historic Building Locations
Property Boundary
Tax Parcel Boundaries
Historic AST Locations

All data are approximate and should be used for relative location reference only.
2020 aerial photograph (GoogleEarth).

0 40 80 120 160 Feet

1 inch = 80 feet

Groundwater Sample Location and Results Map

Prepared for:

Sunset Commons Development Group

Prepared by:

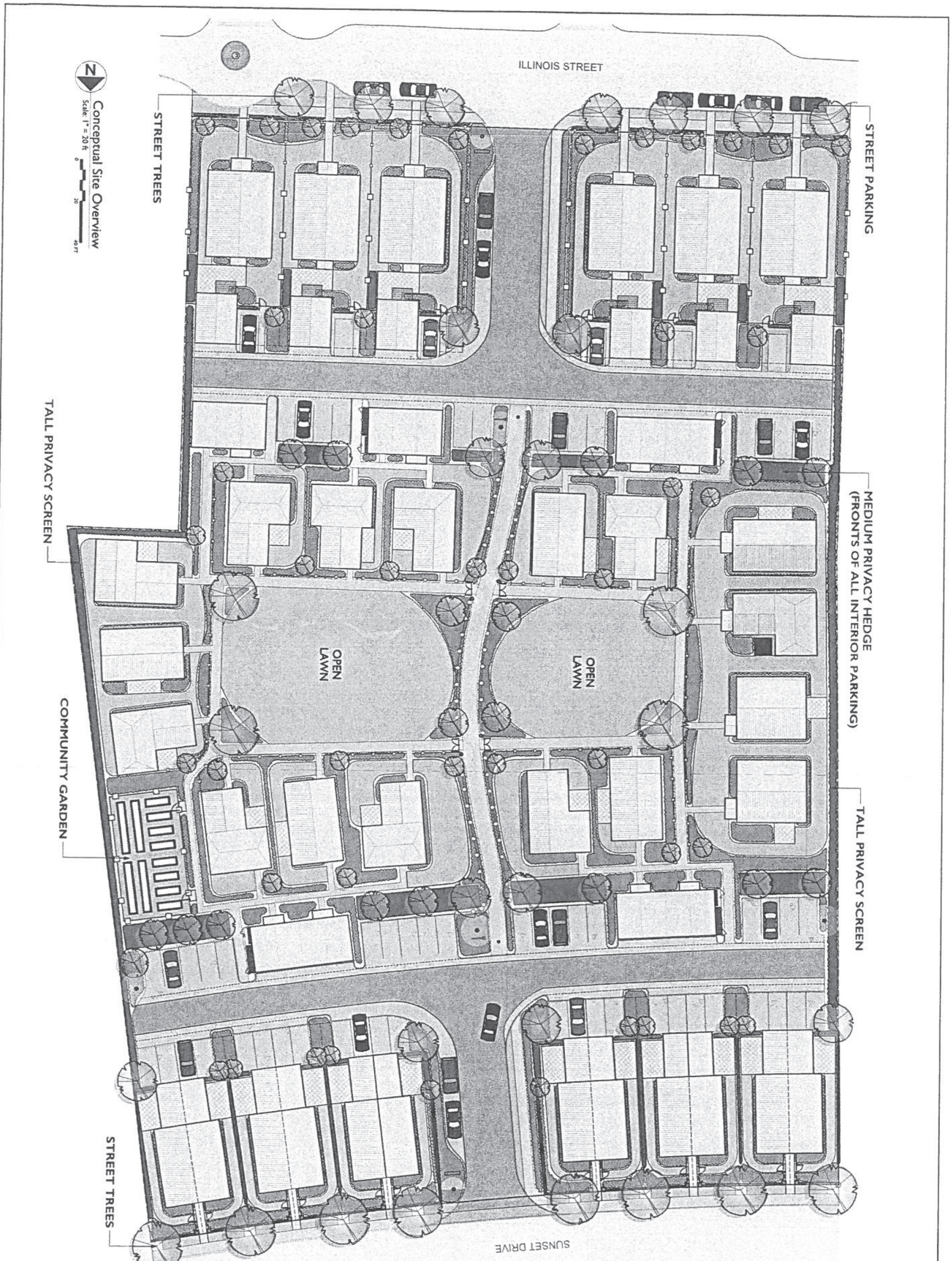
ALL4

512 E Sunset Drive
Bellingham, WA 98225

Sunset Commons

10/30/24

Figure 6



Enclosure A, Figure 4

PROJECT START DATE November 09, 2016

REVISIONS
11/15/2016
11/21/2016
11/30/2016
12/01/2016

Sheet L9 of 9

Sunset Commons

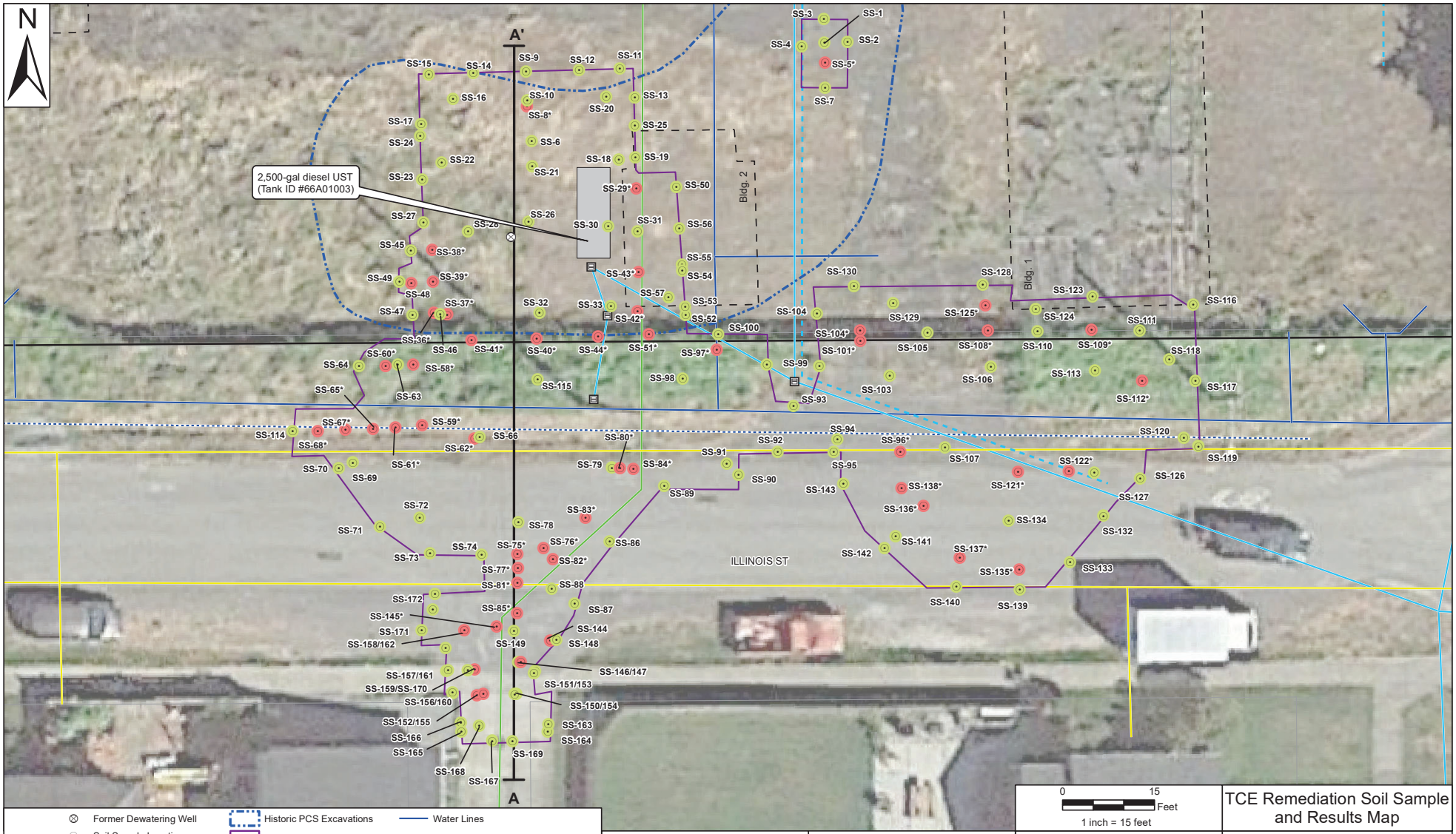
Bellingham WA.

Max Illman Landscape Design
360-333-4330
max@maxillmanld.com
1905 J St. Unit B
Bellingham, WA 98225

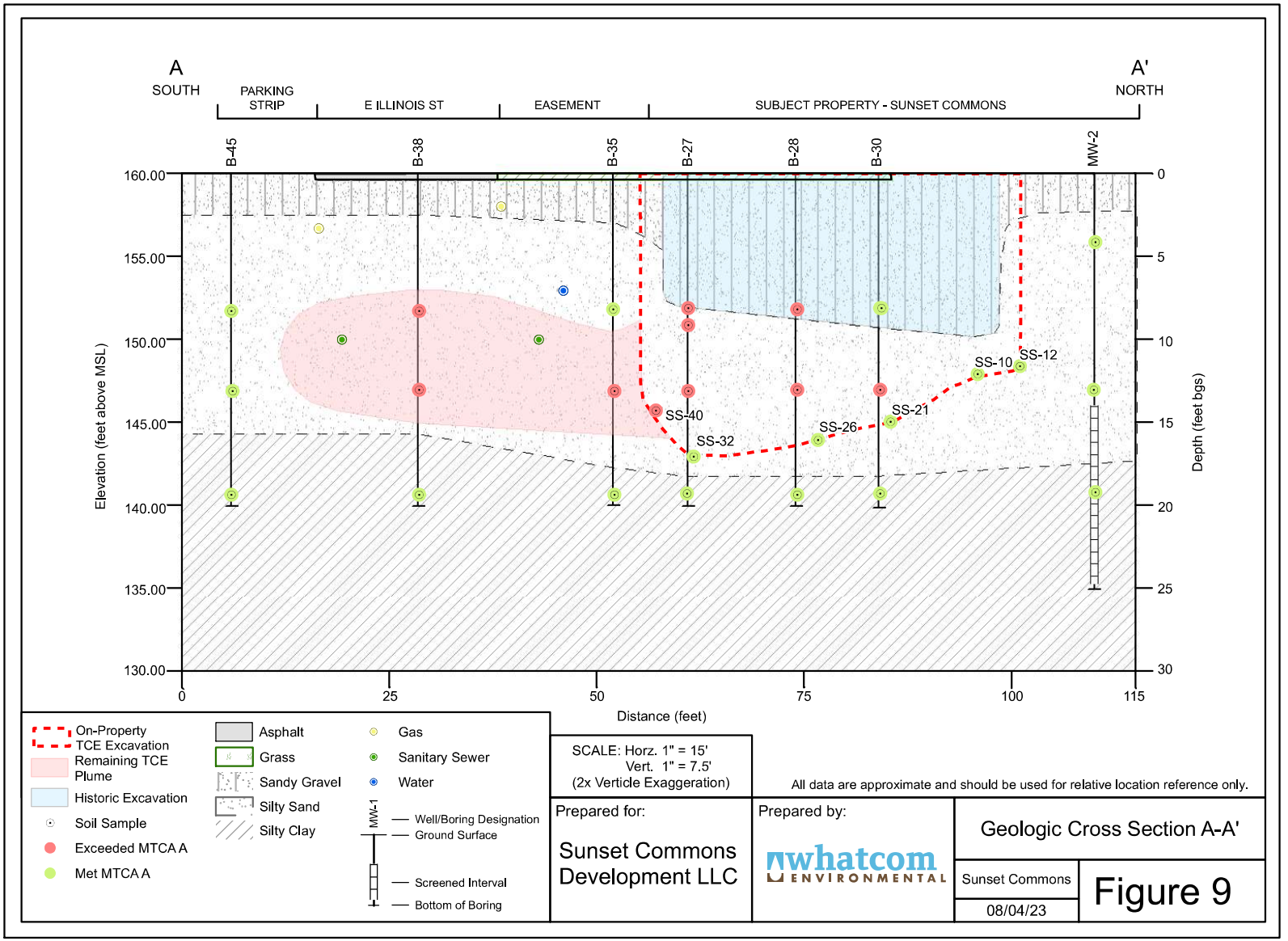
Cascade Design Group
Paul George
Landscape Architect
360-715-2119
paul@cascadedesigngroup.net
P.O. Box 5938
Bellingham, WA 98227

STATE OF WASHINGTON REGISTERED LANDSCAPE ARCHITECT

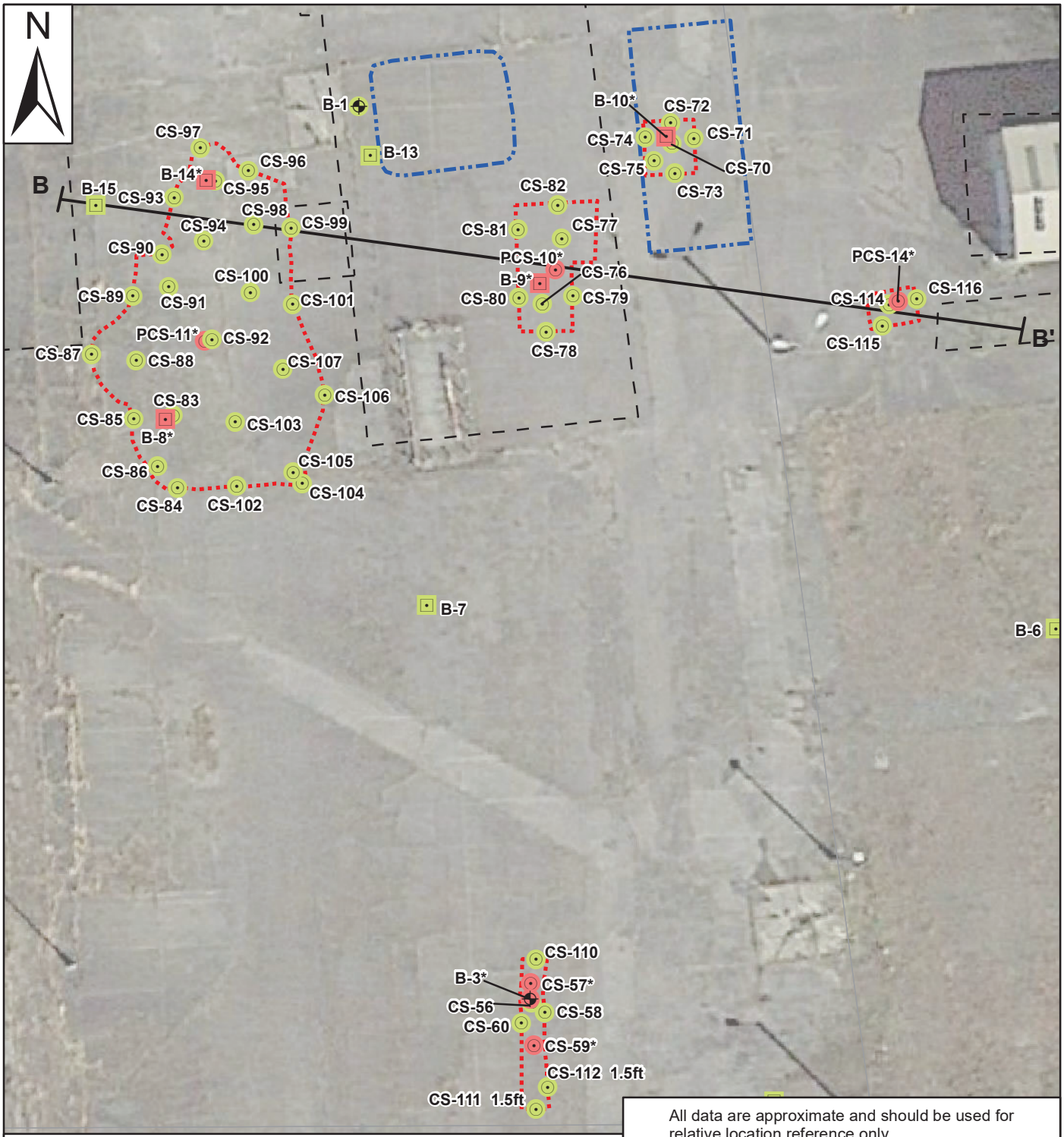
Enclosure A, Figure 5



Enclosure A, Figure 6



Enclosure A, Figure 7



Soil Sample Location

Result Exceeded MTCA A

Result Met MTCA A

* - *Indicates soil sample location was over-excavated and resampled.*

Historic PCS Excavations

2022/2023 PCS Excavations

Historic Building Locations

Property Boundary

Tax Parcel Boundaries

All data are approximate and should be used for relative location reference only.
2020 aerial photograph (GoogleEarth).

0 20 40 60 Feet

1 inch = 30 feet

PCS Remediation Soil Sample Location and Results Map (North)

Prepared for:

Sunset Commons Development Group

Prepared by:

ALL4

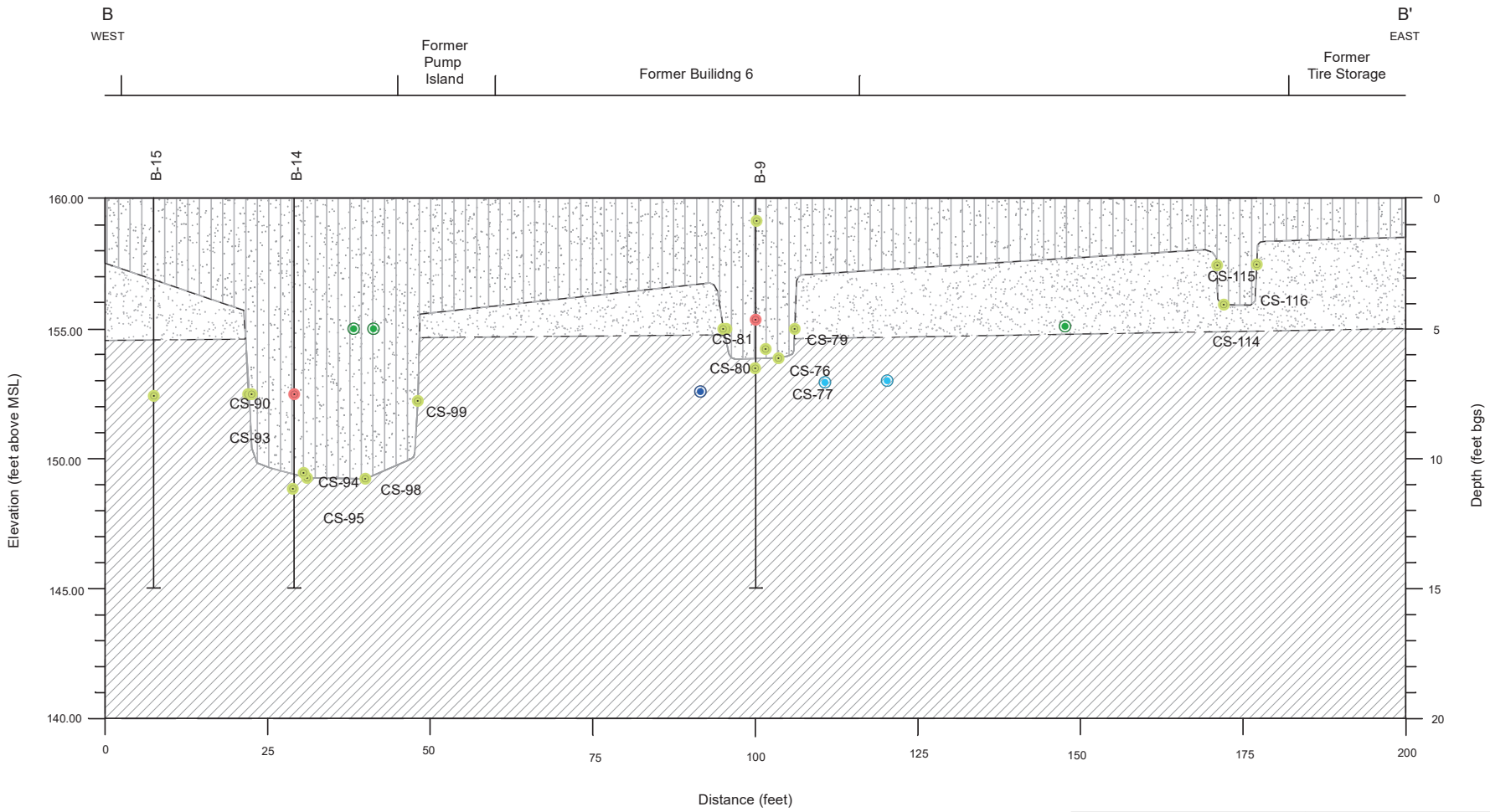
512 E Sunset Drive
Bellingham, WA 98225

Sunset Commons

03/15/24

Figure 9

Enclosure A, Figure 8



All data are approximate and should be used for relative location reference only.

Prepared for:
Sunset Commons Development, LLC

Prepared by:
ALL4

SCALE: Horz. 1" = 16'
Vert. 1" = 4'
(4x Verticle Exaggeration)

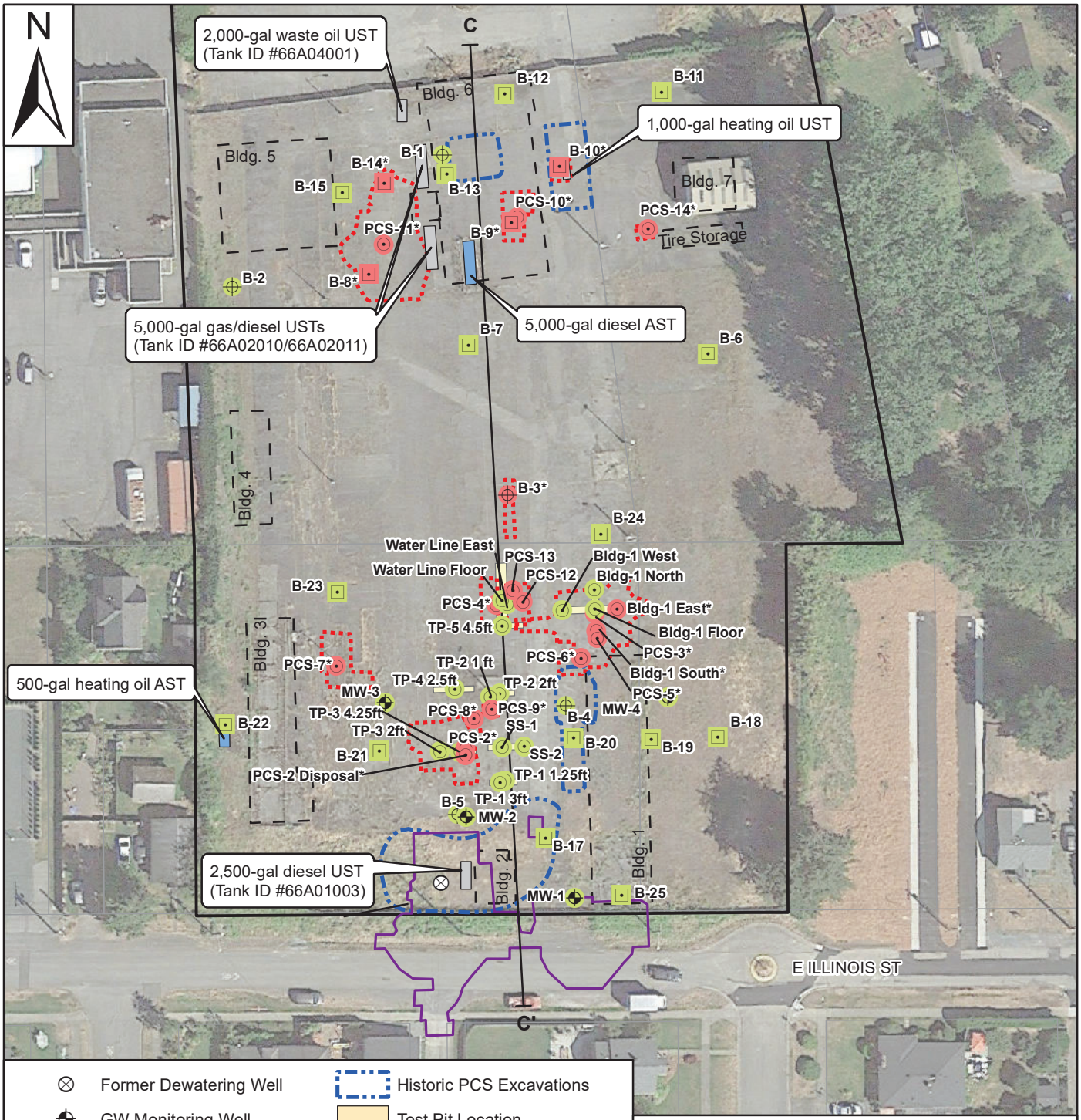
Geologic Cross Section B-B'

512 East Sunset
Bellingham, WA 98225

Sunset Commons
03/15/24

Figure 8

Enclosure A, Figure 9



- Former Dewatering Well
- GW Monitoring Well
- Soil Boring Location
- Temporary Well Location
- Soil Sample Location
- Result Exceeded MTCA A
- Result Met MTCA A
- Historic PCS Excavations
- Test Pit Location
- Historic Building Locations
- Property Boundary
- Tax Parcel Boundaries
- Historic UST Locations
- Historic AST Locations

** - Indicates soil sample location was over-excavated and resampled.*

All data are approximate and should be used for relative location reference only.
2020 aerial photograph (GoogleEarth).

0 40 80 120 160 Feet

1 inch = 80 feet

PCS Characterization Soil Sample Location and Results Map

Prepared for:

Sunset Commons Development Group

Prepared by:

ALL4

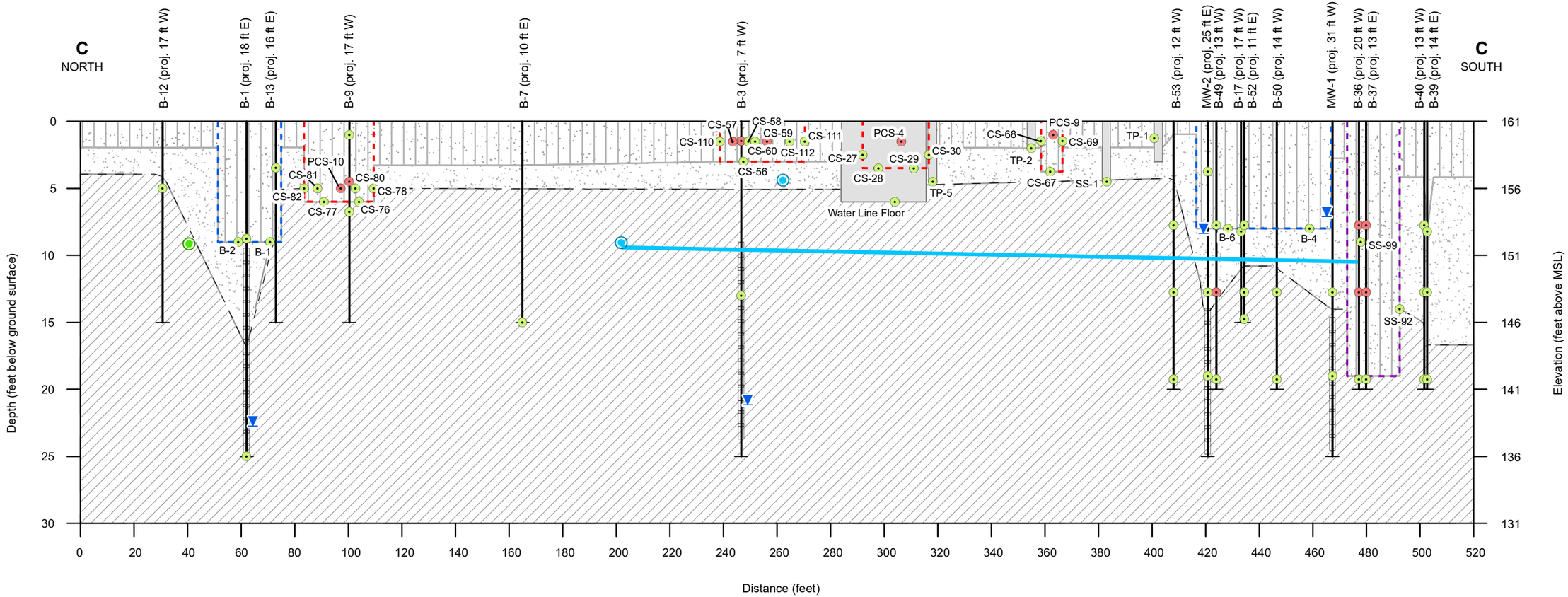
512 E Sunset Drive
Bellingham, WA 98225

Sunset Commons

10/30/24

Figure 4

Enclosure A, Figure 10



Soil Sample Locations
Result Exceeded MTCA A
Result Met MTCA A
1997 PCS Excavations
2022/2023 PCS Excavations
2023 TCE Excavation

Test Pits
Sandy Gravel
Silty Sand
Silty Clay
Water Encountered

Historic Stormwater Lines
Historic Sewer Lines
Historic Stormwater Lines

MW-2
Well/Boring Designation
Ground Surface
Screened Interval
Bottom of Boring

All data are approximate and should be used for relative location reference only.

SCALE: Horz. 1" = 40'
Vert. 1" = 8'
(5x Vertical Exaggeration)

Cross Section C-C'

Reviewed by:

State of Washington
24009477
Licensed Geologist
THOMAS A. DAVIS

10/23/2024

Prepared for:

Sunset Commons Development Group

Prepared by:

ALL4

512 E Sunset Drive
Bellingham, WA 98225

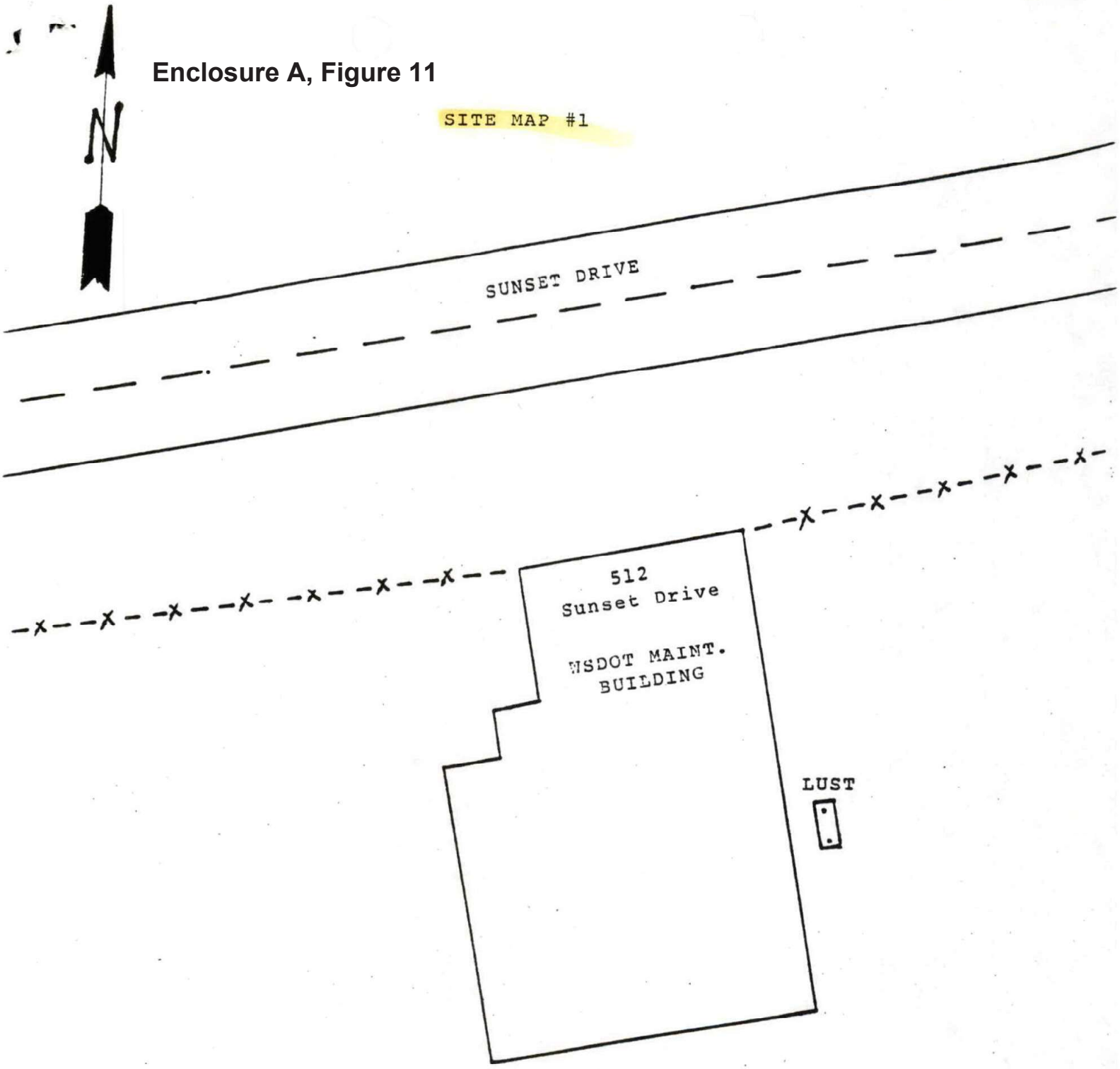
Sunset Commons

10/23/24

Figure 15

Enclosure A, Figure 11

SITE MAP #1



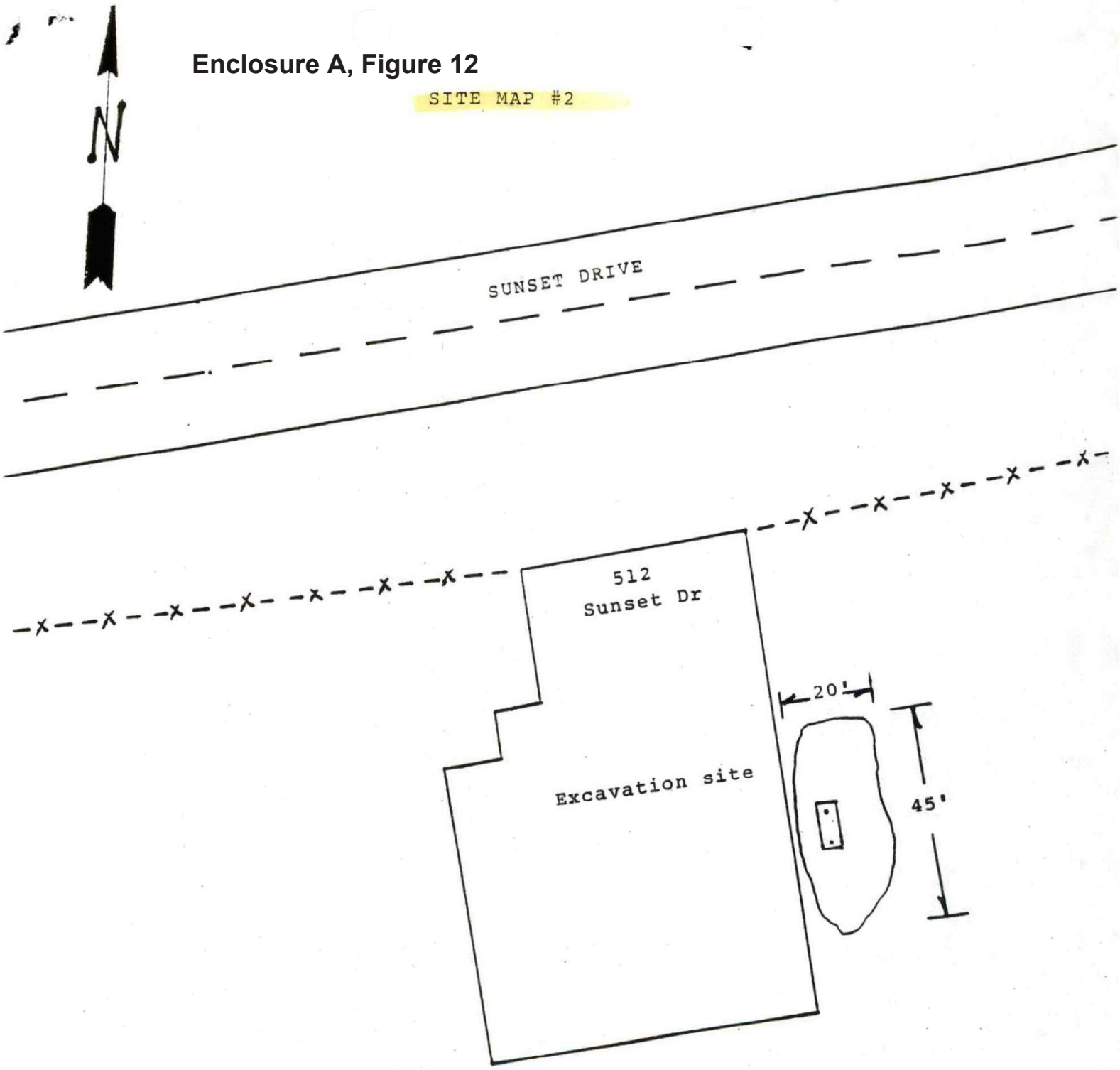
NOTES

1. LUST 1000 Gallon capacity.
2. LUST 10 feet long X 4 feet Dia.
3. Approx.750 gal. of product pumped.
4. Numerous pit holes noted in LUST.

0 10 20 30

Enclosure A, Figure 12

SITE MAP #2



NOTES

1. Excavation approx. 20'-0" X 45'-0"
2. Approximately 250 tons excavated.
3. Top 8'-0" unsaturated sandy soil, near impervious clayish soil then encountered below 8'-0".
4. No ground water encountered thus no groundwater samples.
5. Contaminated soil placed on 10 mill visquene within containment area.
6. Contaminated soil then hauled to Woodworths recyclers Tacoma, WA (206) 383-3585.

0 10 20 30

Enclosure B

Basis for the Opinion: List of Documents

1. ALL4 LLC (ALL4), *Replacement Characterization Figures*, December 6, 2024.
2. ALL4, *Cleanup Action Report*, July 3, 2024.
3. Whatcom Environmental, *Workplan for Site Remediation*, August 9, 2023.
4. Chmelik Sitkin & Davis P.S., *Notification of Independent Remedial Action, 512 E. Sunset Drive, Bellingham, Washington*. August 3, 2022.
5. Department of Ecology (Ecology), Initial Investigation Field Report, Bellingham Area 1 Maintenance HDQ, 512 E. Sunset Dr, Bellingham WA. June 1, 2011.
6. Washington State Department of Ecology, *No Further Action (NFA) Determination associated with Leaking Underground Storage Tank (LUST) Site, LUST ID 2030,* June 14, 2012
7. Washington State Department of Transportation (WSDOT), *Independent Remedial Action Report,* March 6, 2001
8. WSDOT, *Underground Storage Tank Closure and Independent Remedial Action Report,* June 7, 1996
9. WSDOT, *Underground Storage Tank and Removal of Contaminated Soil Report,* April 1, 1994
10. WSDOT, *Cleanup Action Report,* February 15, 1991