



State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
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www.plia.wa.gov

May 21, 2025

Ross Stainsby
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Re: No Further Action at the Following Site:

- **Facility/Site Name:** Highline Water District
- **Facility/Site Address:** 19863 and 19900 28th Avenue South, SeaTac, WA 98188
- **Facility Site ID:** 63829649
- **Cleanup Site ID:** 9982
- **Technical Assistance Program No.:** P-NW2984

Dear Ross Stainsby:

The Washington State Pollution Liability Insurance Agency (PLIA) received your request for an opinion on the independent cleanup of 19863 and 19900 28th Avenue South, SeaTac, WA 98188 (Site). This letter provides PLIA's opinion made under the authority of Chapter 70A.330 RCW and Chapter 374-80 WAC. PLIA appreciates your initiative in pursuing this administrative option for cleaning up a contaminated site under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Opinion on Cleanup

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

This opinion is based on the remedial action meeting the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). Our analysis is provided below.

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Description of the Site

This opinion applies only to the petroleum release at the Site located at 19863 and 19900 28th Avenue South, SeaTac, WA 98188 and comprises King County tax parcel 0422049148 (Figure 1). This opinion does not apply to any other hazardous substance release(s) that may affect the Property (parcel).

The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons (TPH) as gasoline-range organics (GRO), and diesel-range organics (DRO), and oil-range organics (ORO) and benzene into the soil.

Basis of the Opinion

This opinion is based on the information contained in the following documents:

1. *Letter regarding Cover Letter and Request for Opinion on Completed Cleanup*. Prepared by GeoEngineers, Inc. March 4, 2025.
2. *Phase II Environmental Site Assessment*. Prepared by GeoEngineers, Inc. December 12, 2011.

These reports are available for download at: [Highline Water District Public Files](#)

Documents submitted to PLIA are subject to the Public Records Act (Chapter 42.56 RCW). To make a request for public records, please email pliamail@plia.wa.gov.

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

Establishment of Cleanup Standards and Points of Compliance

The cleanup levels (CULs) for the Site will be established in accordance with WAC 173-340-700(5) and WAC 173-340-700(6).

The points of compliance (POCs) for the Site will be established in accordance with WAC 173-340-720(8) for groundwater, WAC 173-340-

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740(6) for soil, and WAC 173-340-750(6) for air.

Analysis of the Cleanup

PLIA has concluded that **no further remedial action** is necessary at the Site. Our conclusion is based on the following analysis:

Review of Data Submitted & Cleanup Status:

Site data demonstrate that petroleum contamination from a petroleum underground storage tank (UST) system release exceeded the levels allowable under MTCA. This opinion only addresses the contaminants of concern (COCs) as detailed in the *Description of the Site* section of this letter. This opinion is based on Site history and data made available to PLIA as of the date of this letter.

PLIA has determined that the cleanup action performed meets cleanup standards established for the Site. The following describes PLIA's opinion of the Site status:

One 3,000-gallon gasoline UST, one 500-gallon diesel UST, and one approximately 1,000-gallon heating oil UST were removed from the Site in 1992. Approximately 53 cubic yards of petroleum-contaminated soil (PCS) were excavated from the vicinity of the gasoline UST and transported off-Site for disposal. COCs were not detected in confirmation soil samples collected from the gasoline and diesel excavations. Descriptions of the heating oil UST condition at the time of removal and condition of soils in the heating oil UST excavation were not provided.

In 2011, ten test pits were completed at the Site to depths between 6' and 12' below ground surface (bgs) to evaluate soil conditions proximate to the former UST locations and other former operational areas of the Site. COC concentrations did not exceed the Method A CULs in soil samples collected from the test pits.

i. Soil:

- The soil sample results demonstrate that PCS with concentrations of COCs exceeding the applicable CULs was removed from the Site.
- Soil sample results are listed in the following tables:
 - Tables 1 and 2. *Phase II Environmental Site Assessment*

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Result: The data indicate the soil direct contact and soil leaching to groundwater exposure pathways are incomplete at the Site. The remedial action removed the potential for PCS with concentrations of COCs exceeding CULs to come into contact with human or ecological receptors or leach into groundwater.

ii. Groundwater:

- Groundwater was not encountered at the maximum depth explored of 12' bgs. Local well logs indicate the depth to shallow groundwater in the area is greater than 30' bgs.

Result: The data indicate the groundwater exposure pathway is incomplete at this Site. The remedial action removed the potential for groundwater with concentrations of COCs exceeding CULs to come into contact with humans or ecological receptors.

iii. Air (Soil or Groundwater to Vapor):

- The lateral and vertical extent of PCS was successfully remediated to concentrations of Site COCs less than the MTCA Method A CULs.

Result: The data indicate the vapor intrusion exposure pathway is incomplete at this Site. The remedial action removed the potential for vapors from PCS to enter nearby commercial or residential structures.

iv. Surface Water:

- Not applicable for the Site. The nearest surface water, Angle Lake, is approximately 1,400' to the northeast of the Site.

Result: The surface water exposure pathway is incomplete at this Site. This means that, based on current data, petroleum contamination has not spread to surface water.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Under MTCA, liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting

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from the release(s) of hazardous substances at the Site. This opinion **does not:**

- Change the boundaries of the Site.
- 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 the Office of the Attorney General and the Department of Ecology under RCW 70A.305.040(4).

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 equivalent. Courts make that determination (RCW 70A.305.080 and WAC 173-340-545).

3. State is immune from liability.

The state, PLIA, 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.

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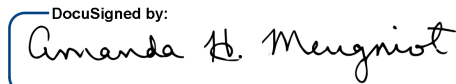
Termination of Agreement

This opinion terminates the Technical Assistance Program (TAP) agreement for Project No. P-NW2984.

Contact Information

Thank you for choosing to clean up your Site under PLIA's TAP. If you have any questions about this opinion, please contact me by phone at 1-800-822-3905, or by email at pliamail@plia.wa.gov.

Sincerely,

DocuSigned by:

D50D816A31E34C8...
Amanda Meugniot, L.G.
Hydrogeologist

Enclosure A: Figure 1: Site Location
 Figure 2: Site Plan

cc: Marsi Beeson, GeoEngineers, Inc. (by email)
 Tricia DeOme, GeoEngineers, Inc. (by email)

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Enclosure A:

**TAP Project No. P-NW2984
19863 and 19900 28th Avenue South,
SeaTac, WA 98188**

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Figure 1: Site Location



Source: Phase II Environmental Site Assessment, GeoEngineers, Inc., December 12, 2011.

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Figure 2: Site Plan



Source: Phase II Environmental Site Assessment, GeoEngineers, Inc., December 12, 2011.