

use of institutional controls in the form of an environmental covenant that govern future utility or infrastructure work in the ROWs.

Regulatory Requirements

MTCA sets forth the minimum requirements and procedures for selecting a cleanup action. A cleanup action must meet each of the minimum requirements specified in WAC 173-340-360(3).

General Requirements

WAC 173-340-360(3)(a) sets forth the following general requirements for the cleanup action:

- Protect human health and the environment, including likely vulnerable populations and overburdened communities
- Comply with cleanup standards (see pages 14 through 17)
- Comply with applicable state and federal laws (see pages 23 and 24)
- Prevent or minimize present and future releases and migration of hazardous substances
- Provide resilience to climate change impacts that have a high likelihood of occurring and severely compromising its long-term effectiveness
- Provide for compliance monitoring
- Not rely primarily on institutional controls and monitoring if it's technically possible to implement a more permanent cleanup action
- Not rely primarily on dilution and dispersion over active remediation, unless the incremental costs grossly exceed the incremental benefits
- Provide for a reasonable restoration time frame
- Use permanent solutions to the maximum extent practicable

Action-specific Requirements

WAC 173-340-360(3)(b) includes the following requirements that apply to the Site. The Site must:

- Use institutional controls (WAC 173-340-440)
- Provide financial assurances (WAC 173-340-440(11))
- Provide for periodic reviews (WAC 173-340-420(2))

Media-specific Requirements

WAC 173-340-360(3)(c) includes the following requirement that applies to the Site. A soil cleanup action must treat, remove, or contain contamination on properties that qualify as a residential area based on current use or potential future use based on local plans.

Determination of Reasonable Restoration Time Frame

An evaluation of whether a cleanup action alternative provides a reasonable restoration time frame must be conducted unless a model remedy is selected as the cleanup action. WAC 173-

340-360(4) provides evaluation factors to determine whether a cleanup action has a reasonable restoration time frame.

- Potential risks posed by the site to human health and the environment, including likely vulnerable populations and overburdened communities.
- Practicability of achieving a shorter restoration time frame. A restoration time frame is not reasonable if an active remedial measure with a shorter restoration time frame is practicable.
- Long-term effectiveness of the alternative. A longer restoration time frame may be reasonable if the alternative has a greater degree of long-term effectiveness than one that primarily relies on on-site or off-site disposal, isolation, or containment.
- Current and potential future use of the site, surrounding areas, and associated resources that are, or may be, affected by releases from the site.
- Availability of alternative water supplies.
- Likely effectiveness and reliability of institutional controls.
- Ability to control and monitor migration of hazardous substances from the site.
- Toxicity of the hazardous substances at the site.
- Natural processes that reduce concentrations of hazardous substances and have been documented to occur at the site or under similar site conditions.
- For Ecology-led and Ecology-supervised cleanup actions, public concerns identified under WAC 173-340-600 (13) and (14) and Indian Tribes' rights and interests.

Determining Permanent to the Maximum Extent Practicable

WAC 173-340-360(5) describes the requirements and procedures for determining whether a cleanup action uses permanent solutions to the maximum extent practicable (PMEP). A permanent solution meets CULs without further action being required at the site other than the disposal of residue from treating hazardous substances.

To determine whether a cleanup action uses PMEP, a disproportionate cost analysis is conducted. This analysis compares the costs and benefits of the cleanup action alternatives and involves considering several factors, including:

- Protectiveness
- Permanence
- Long-term effectiveness
- Management of implementation risk
- Implementability
- Cost

The comparison of benefits and costs may be quantitative but will often be qualitative and require the use of best professional judgment.

The procedure to perform the PMEP analysis involves comparing the most permanent alternative to the next most permanent and determining if the costs outweigh the benefits in that pair. If they do, the less permanent alternative is compared to the next most permanent

alternative and compared again. This continues until the costs do not outweigh the benefits. This evaluation can be done quantitatively/graphically or can be done qualitatively.

Cleanup Action Expectations

WAC 173-340-370 sets forth the following expectations for developing cleanup action alternatives and selecting cleanup actions. These expectations represent the types of cleanup actions Ecology considers likely results of the remedy selection process; however, we recognize there may be some sites where cleanup actions conforming to these expectations are not appropriate.

- Treatment technologies will be emphasized at sites with liquid wastes, areas with high concentrations of hazardous substances, or with highly mobile and/or highly treatable contaminants
- To minimize the need for long-term management of contaminated materials, hazardous substances will be destroyed, detoxified, and/or removed to concentrations below CULs throughout sites with small volumes of hazardous substances
- Engineering controls, such as containment, may need to be used at sites with large volumes of materials with relatively low levels of hazardous substances where treatment is impracticable
- To minimize the potential for migration of hazardous substances, active measures will be taken to prevent precipitation and runoff from contacting contaminated soil or waste materials
- When hazardous substances remain on-site at concentrations that exceed CULs, they will be consolidated to the maximum extent practicable to minimize the potential for direct contact and migration of hazardous substances
- For sites adjacent to surface water, active measures will be taken to prevent/minimize releases to that water; dilution will not be the sole method for demonstrating compliance
- Natural attenuation of hazardous substances may be appropriate at sites under certain specified conditions (see WAC 173-340-370(7))
- Cleanup actions will not result in a significantly greater overall threat to human health and the environment than other alternatives

Applicable, Relevant, and Appropriate State and Federal Laws, and Local Requirements

WAC 173-340-710(1) requires all cleanup actions to comply with all applicable local, state, and federal law. It further states the term “applicable state and federal laws” shall include legally applicable requirements and requirements the department determines “...are relevant and appropriate requirements” (ARARs). This section discusses applicable state and federal law, ARARs, and local permitting requirements that were considered and were of primary importance in selecting cleanup requirements. If other requirements are identified later, they will be applied to the cleanup actions.

MTCA provides an exemption from the procedural requirements of several state laws and from any laws authorizing local government permits or approvals for remedial actions conducted under a consent decree, order, or agreed order (RCW 70A.305.090). However, the substantive requirements of a required permit must be met. The procedural requirements of the following state laws are exempted:

- Ch. 70A.15 RCW, Washington Clean Air Act
- Ch. 70A.205 RCW, Solid Waste Management—Reduction and Recycling
- Ch. 70A.300 RCW, Hazardous Waste Management
- Ch. 77.55 RCW, Construction Projects in State Waters
- Ch. 90.48 RCW, Water Pollution Control
- Ch. 90.58 RCW, Shoreline Management Act of 1971
- Any laws requiring or authorizing local government permits or approvals for the remedial action

WAC 173-340-710(4) sets forth the criteria Ecology evaluates when determining whether certain requirements are relevant and appropriate for a cleanup action. ARARs for the cleanup alternatives at this Site are discussed in the next section. Local laws, which may be more stringent than state and federal laws, will govern where applicable.

Evaluation of Cleanup Action Alternatives

The requirements and criteria outlined in the Regulatory Requirements section on pages 23 and 24 are used to conduct a comparative evaluation of the cleanup action alternatives and to select a cleanup action from those alternatives. Table B-2 provides a summary of the ranking of the cleanup alternatives against the various criteria.

Regulatory Requirements

General Requirements

Cleanup Alternatives 1 and 2 are designed to meet the general cleanup action requirements of WAC 173-340-360(3)(a). These alternatives are protective of human health and the environment, including likely vulnerable populations and overburdened communities, by actively reducing contaminant mass and exposure pathways through either in-place remediation or physical removal. Both alternatives are structured to comply with cleanup standards specified elsewhere in this document (see page 14) and all applicable state and federal laws (see pages 23 and 24), helping to ensure both immediate and long-term protectiveness. The selected approaches prevent or minimize the potential for present or future releases and migration of hazardous substances by utilizing permanent treatment and removal strategies, rather than relying primarily on institutional controls or monitoring.

To further support long-term effectiveness and resilience, each alternative incorporates engineered and institutional controls to remain protective in the face of climate change impacts, such as increased precipitation or groundwater fluctuations. Comprehensive compliance monitoring will be implemented to verify that cleanup levels are achieved and maintained throughout the remedial action and into the long-term stewardship phase.

Institutional controls and long-term monitoring are only used where complete removal or treatment of contamination is not technically practicable, specifically, where contamination remains beneath existing structures or site features. Neither alternative relies primarily on dilution or dispersion, and active remediation is implemented to the maximum extent practicable. The selected remedies provide for a reasonable restoration time frame and are consistent with the MTCA requirement for using permanent solutions to the maximum extent practicable.

Climate change impacts were estimated using the [Climate Mapping for a Resilient Washington webtool](#),⁴ funded by the State of Washington and developed by the University of Washington. The webtool generally predicts increases in temperature and precipitation. These will increase the chance for erosion, flooding events, and wildfire likelihood.

As discussed in the RI/FS, based on a review of information in the GIS Mapping Tool, it is unlikely that conditions at the Site would be impacted by climate change, therefore, the cleanup strategy for the Site will not be impaired by climate change (GeoEngineers 2026b).

There are three types of compliance monitoring: protection, performance, and confirmational. Protection monitoring is designed to protect human health and the environment during the construction and operation and maintenance phases of the cleanup action. Performance monitoring confirms the cleanup action has met cleanup and/or performance standards. Confirmational monitoring confirms the long-term effectiveness of the cleanup action once cleanup standards have been met or other performance standards have been attained.

Three types of compliance monitoring will be implemented during remedial actions in accordance with MTCA requirements (WAC 173-340-410):

Protection Monitoring: Conducted to ensure that human health and the environment are adequately protected throughout implementation of the interim action, as outlined in the site-specific Health and Safety Plan (HASP). The HASP complies with federal (29 CFR 1910.120 and 1926) and state (WAC 173-340-810 and WAC 296-62) regulations, identifying relevant physical, chemical, and biological hazards, and specifying monitoring protocols and controls. All personnel engaged in soil disturbance will have appropriate hazardous waste operations training.

Performance Monitoring: Conducted to verify that remedial actions meet applicable screening levels or other performance standards and demonstrate compliance with substantive regulatory requirements. Performance monitoring includes the collection and laboratory analysis of in-situ soil samples from excavation areas to determine whether contaminant concentrations exceed screening levels. These results inform decisions regarding excavation limits.

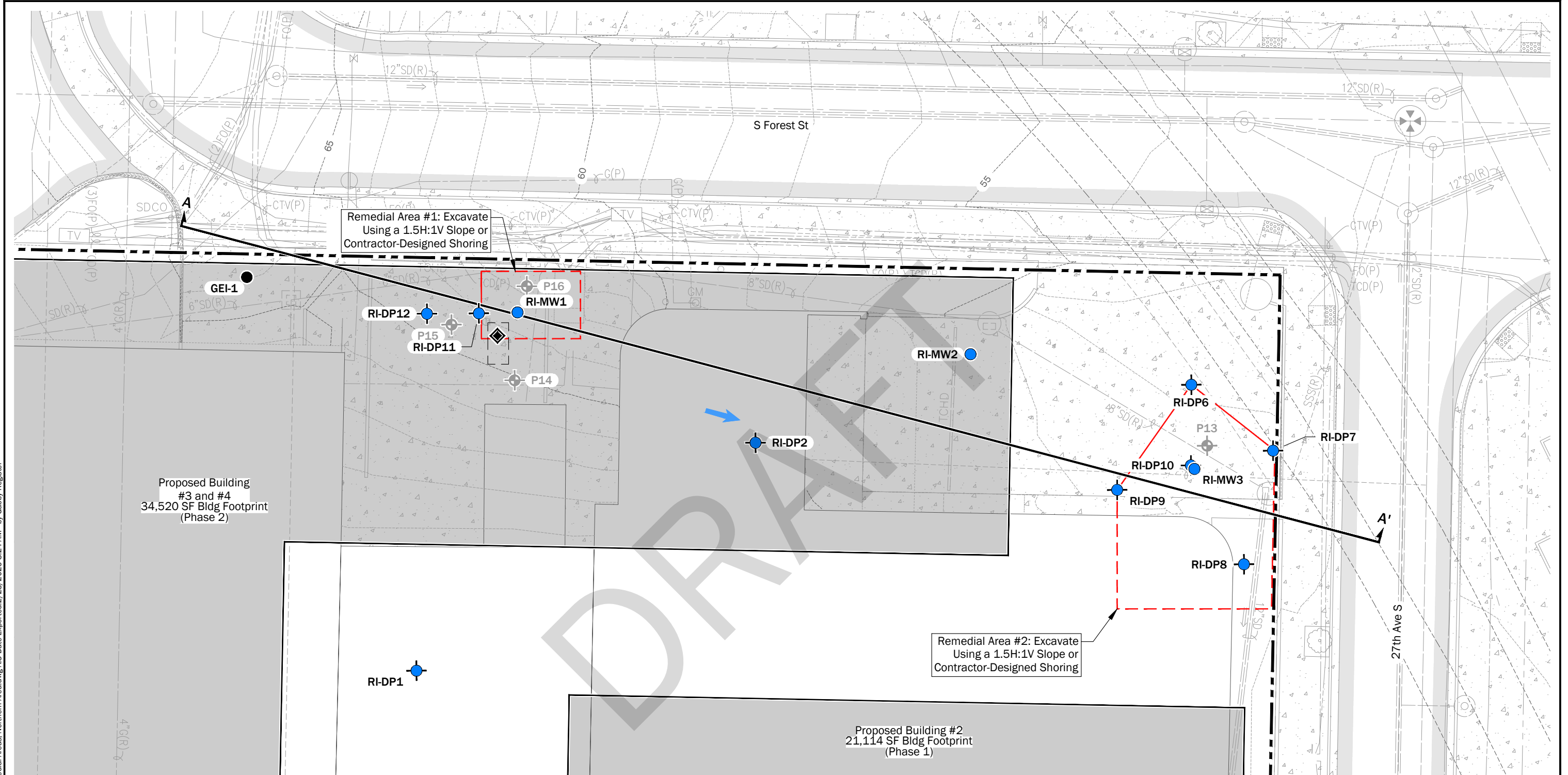
Confirmational Monitoring: Confirmational monitoring consists of collecting and analyzing in-situ soil samples from the base and sidewalls of the final excavation to verify attainment of

⁴ <https://cig.uw.edu/resources/analysis-tools/climate-mapping-for-a-resilient-washington/>

Appendix A. Figures

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P:\17\17613012\CAD\01\cap report\1761301201_F2_Remedial Areas_Northern Area.dwg A.3 Date Exported:2/23/2026 8:24 AM - by Gabby Register



Remedial Area #1: Excavate Using a 1.5H:1V Slope or Contractor-Designed Shoring

Remedial Area #2: Excavate Using a 1.5H:1V Slope or Contractor-Designed Shoring

Proposed Building #3 and #4
34,520 SF Bldg Footprint
(Phase 2)

Proposed Building #2
21,114 SF Bldg Footprint
(Phase 1)

Legend

- Site Boundary
- Cross Section Location
- Approximate Underground Storage Tank (UST)
- Proposed Building
- Estimated Groundwater Flow Direction
- UST Fill Port

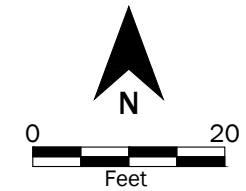
- GEI-1 Geotechnical Boring with Monitoring Well by GeoEngineers, 2025
- RI-DP1 Remedial Investigation Boring by GeoEngineers, 2025
- RI-MW-1 Remedial Investigation Monitoring Well by GeoEngineers, 2025
- P13 Phase II ESA Boring by SoundEarth, 2019
- Approximate Remedial Excavation Boundary**
Limit Delineated
- Limit Not Delineated

Note(s):

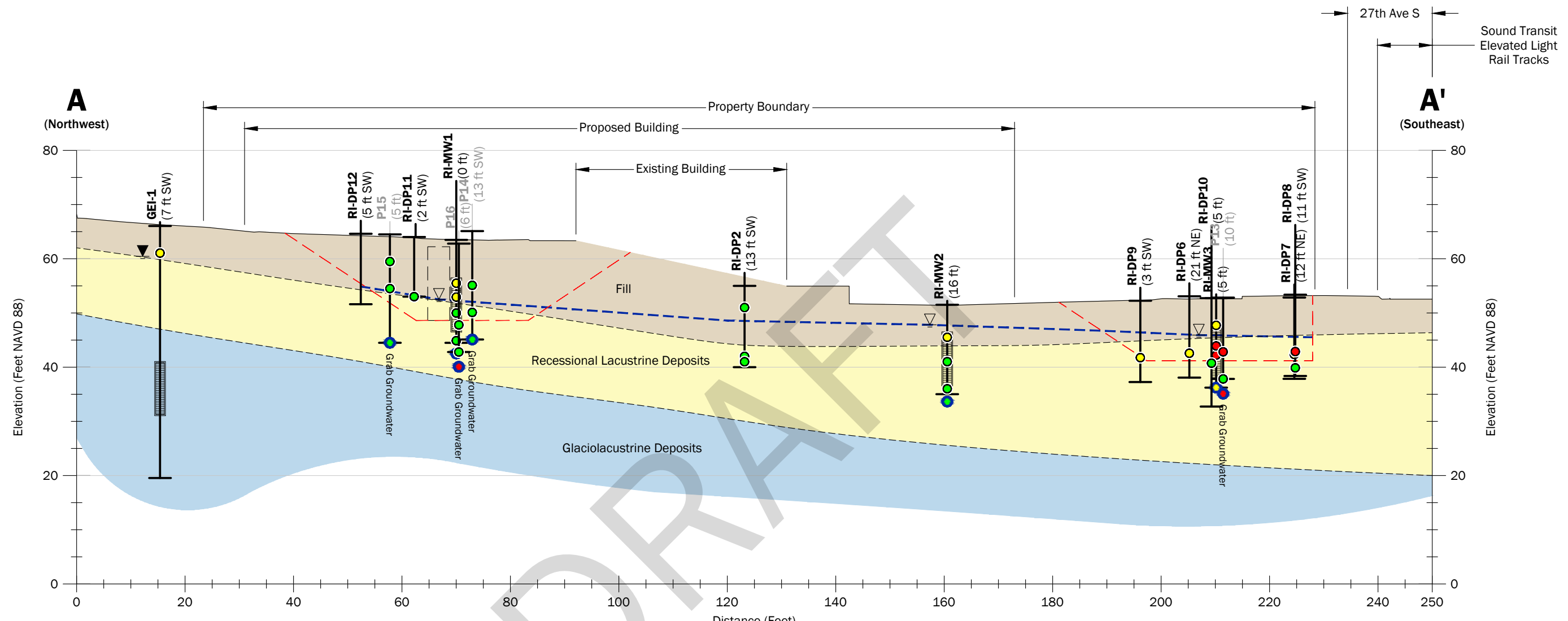
- Cleanup activities in the two remedial areas will follow procedures described in the Soil Management Plan.
- Remedial area boundaries are estimated based on explorations performed by GeoEngineers (2025) and Sound Earth Strategies (2019).

Source: Survey from Bush, Roed and Hitchings, Inc., dated 10/18/2024
Coordinate System: WA State Plane, North Zone, NAD83, US Foot

Disclaimer: This figure was created for a specific purpose and project. Any use of this figure for any other project or purpose shall be at the user's sole risk and without liability to GeoEngineers. The locations of features shown may be approximate. GeoEngineers makes no warranty or representation as to the accuracy, completeness, or suitability of the figure, or data contained therein. The file containing this figure is a copy of a master document, the original of which is retained by GeoEngineers and is the official document of record.



Remedial Areas, Northern Area	
UW Mount Baker Laundry Site, CAP Report Seattle, Washington	
	Figure A.3



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Note(s):

- The subsurface conditions shown are based on interpolation between widely spaced explorations and should be considered approximate; actual subsurface conditions may vary from those shown.
- DP7 is North, at the property line.
- DP8 is South, along property line and building.
- Where practical, excavations will be completed without shoring using a slope of approximately 1.5 horizontal to 1 vertical (1.5H:1V). If these slopes are not achievable, then the excavations will be completed using shoring designed by the excavation contractor and approved by a Professional Engineer registered in Washington State.

Datum: NAVD88

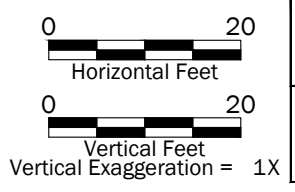
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Legend

- Boring ID (Offset)
- Inferred Soil Contact
- Approximate Shallow Groundwater Table
- Well Screen
- Shallow Groundwater Elevation
- Deep Groundwater Elevation
- Fill
- Recessional Lacustrine Deposits
- Glaciolacustrine Deposits
- Approximate Underground Storage Tank (UST)
- Approximate Remedial Excavation Boundary

Sampling Results Summary

- COC(s) Not Detected in Soil Sample
- COC(s) Detected in Soil Sample at Concentrations Less than MTCA Cleanup Level (CUL)
- COC(s) Detected in Soil Sample at Concentrations Greater than MTCA CUL
- Groundwater Sample



Cross Section A-A'

UW Mount Baker Laundry Site, CAP Report
Seattle, Washington

GEOENGINEERS

Figure A.4

Appendix B. Tables

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Table 1
Technology Screening for Cleanup Alternatives
 UW Mount Baker Laundry Site - RI/FS
 Seattle, Washington

Remediation Technology	Description	Score									Rank	Retain (Y/N)
		Implementability	Protectiveness	Permanence	Effectiveness	Short-Term Risk Management	Restoration Time Frame	Consideration of Public Concerns	Cost	Total Score		
Monitored Natural Attenuation	Periodic sampling and analysis of soil and groundwater to evaluate degradation of COCs.	4	1	2	1	2	1	1	4	16	4	Y
Engineering and Institutional Controls	Utilizing buildings and other hardscapes planned for construction as part of property redevelopment as a barrier to prevent contact with COC-contaminated soil and groundwater.	4	2	2	1	2	1	1	4	17	3	Y
	Recording an Environmental Covenant requiring implementation of a Environmental Media Management Plan (EMMP) and prohibiting the withdrawal of groundwater at the Site for beneficial use.											
In-situ Treatment	Treatment of COC-contaminated soil and groundwater using thermal remediation methods such as steam-enhanced extraction, electrical-resistance heating, or thermal-conductive heating. This method involves the injection of energy into the subsurface to mobilize and recover volatile organic compounds and petroleum hydrocarbons.	1	3	2	2	1	3	2	1	15	2	Y
Excavation and Off-Property Disposal	Excavation and off-site disposal of COC-contaminated soil and treatment of residual COC-contaminated soil and groundwater using a treatment chemical (e.g. PetroFix).	3	4	4	4	3	4	3	2	27	1	Y

Notes:

Scores = 0 least favorable, 4 most favorable.

Rank = Relative position to other technologies based on total score.

Total Score = Sum of individual scores.

COC = contaminant of concern.

N = Not retained for consideration in cleanup alternatives.

Y = Retained for consideration in cleanup alternatives.

Table 2
Alternatives Evaluation
 UW Mount Baker Laundry Site - RI/FS
 Seattle, Washington

	Cleanup Alternative 1	Cleanup Alternative 2
	In Situ Treatment and Engineering/Institutional Controls with Monitored Natural Attenuation	Excavation and Off-Property Disposal and Engineering/Institutional Controls with Monitored Natural Attenuation
Description	Treatment of soil and groundwater contaminated with only petroleum-related COCs (and not lead) using thermal remediation methods such as steam-enhanced extraction, electrical-resistance heating, or thermal-conductive heating. The planned hardscapes would be utilized to limit contact with any potential contamination remaining in place following redevelopment. An Environmental Covenant requiring implementation of a Environmental Media Management Plan for any residual COC-contaminated soil and groundwater that cannot be removed as part of the cleanup action excavation. Long-term groundwater monitoring would be conducted for MNA.	Excavation and off-site disposal of COC-contaminated soil during cleanup action activities. The planned hardscapes would be utilized to limit contact with any potential contamination remaining in place following the cleanup action and property improvements. An Environmental Covenant requiring implementation of a Environmental Media Management Plan for any residual COC-contaminated soil and groundwater that cannot be removed as part of the cleanup action excavation. A treatment chemical, such as PetroFix™ by Regenesys, will be applied to the base of the excavation to treat any residual COC-contaminated soil and/or groundwater. Long-term groundwater monitoring would be conducted for MNA.
THRESHOLD REQUIREMENTS		
Description	Yes —Cleanup alternative will protect human health and the environment. Worker protections will be needed in areas where COCs in soil are present at concentrations exceeding MTCA cleanup levels.	Yes —Cleanup alternative will protect human health and the environment. Worker protections will be needed in areas where COCs in soil are present at concentrations exceeding MTCA cleanup levels.
Compliant with Cleanup Standards	Yes —for only soil contaminated with petroleum-related COCs—Cleanup alternative will comply with cleanup standards for soil. Concentrations of petroleum-related COCs in soil will be reduced to below MTCA cleanup levels at the point of compliance. Residual COC-contaminated soil and groundwater would be addressed by No —for soil contaminated with lead—Cleanup alternative will NOT comply with cleanup standards for soil. Concentrations of lead in soil will NOT be reduced to below MTCA cleanup levels at the point of compliance. Lead-contaminated soil would be covered with an engineered cap.	Yes —Soil Only—Cleanup alternative will comply with cleanup standards. Concentrations of COCs in soil will be reduced to below MTCA cleanup levels at the point of compliance. Residual COC-contaminated soil and groundwater remaining would be treated with in-situ chemical treatment (PetroFix) followed by MNA and implementation of engineered and institutional controls.
Compliant with Applicable State and Federal Laws	Yes —Cleanup alternative will comply with applicable laws.	Yes —Cleanup alternative will comply with applicable laws.
Provision for Compliance Monitoring	Yes —Long-term compliance monitoring for groundwater at the Site will be required.	Yes —Long-term compliance monitoring for groundwater at the Site will be required.
OTHER REQUIREMENTS		
Permanent to the Maximum Extent Practicable (see detail below)	Yes —Cleanup alternative is permanent to the maximum extent practicable.	Yes —Cleanup alternative is permanent to the maximum extent practicable.
Reasonable Restoration Time Frame	Yes —Site restoration time frame is <1 year following the start of remediation activities, followed by long-term groundwater monitoring for a period of 3-5 years.	Yes —Site restoration time frame is <1 year following the start of remediation activities, followed by long-term groundwater monitoring for a period of 3-5 years.
EVALUATION CRITERIA FOR PERMANENCE TO THE MAXIMUM EXTENT PRACTICABLE		
Protectiveness (30% Weighted Factor)	Cleanup alternative will achieve overall protection. = 3	Cleanup alternative will achieve overall protection. = 4
Permanence (20% Weighted Factor)	Cleanup alternative will remediate soil and groundwater contaminated with petroleum-related COCs at the property. However, lead-contaminated soil will remain at the property and residual petroleum-contaminated groundwater and/or soil may remain beneath the City of Seattle ROW. = 2	Cleanup alternative will remediate COC-contaminated soil at the property. However, COC-contaminated soil may remain beneath the City of Seattle ROW. COC-contaminated groundwater would likely attenuate at the property. = 4
Long-Term Effectiveness (20% Weighted Factor)	Cleanup alternative is a permanent solution for COC-contaminated soil. = 3	Removal is the most permanent solution for COC-contaminated soil. = 4
Short-Term Risk Management (10% Weighted Factor)	Cleanup alternative would pose a short-term risk for personnel performing field work and would require controls to eliminate the potential for impacts to the public. = 1	Cleanup alternative would pose a limited short-term risk for personnel performing field work. = 4
Technical and Administrative Implementability (10% Weighted Factor)	Cleanup alternative requires engineering component that may delay property improvements, with field work, reporting, and legal administrative matters. = 2	Cleanup alternative requires some field work, reporting, and legal administrative matters. = 3
Public Concerns (10% Weighted Factor)	Cleanup alternative may cause some public concern due to the remediation process. = 2	Cleanup alternative may cause some limited public concern; however, complete removal of COC-contaminated soil is a remedy generally accepted by the public. = 4
Overall Score	2.4	3.9

Notes:

BTEX - benzene, toluene, ethylbenzene, and xylenes

COCs retained for evaluation through the focused feasibility study include total petroleum hydrocarbons as gasoline-range organics, and BTEX.

COCs = contaminant of concern

MTCA = Washington State Model Toxics Control Act Regulation

MNA = monitored natural attenuation

ROW = right-of-way

Appendix C. Terrestrial Ecological Evaluation

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Under the [Model Toxics Control Act](#)¹ (MTCA), the Department of Ecology (Ecology) requires a terrestrial ecological evaluation (TEE) if hazardous substances are released to the soil at a site. In this case, you must take one of these three actions as part of your site investigation and cleanup.

1. Document an exclusion from further evaluation under WAC [173-340-7491](#).²
2. Conduct a simplified evaluation under WAC [173-340-7492](#).³
3. Conduct a site-specific evaluation under WAC [173-340-7493](#).⁴

This form documents the TEE type and results for your Site. You must fill out and submit this form to Ecology to complete your remedial investigation. Completing this form alone isn't enough to document your evaluation. You still need to document your analysis and the basis for your conclusion in a cleanup plan or report. For more information, contact the Ecology cleanup project manager assigned to your Site, visit our [Terrestrial Ecological Evaluations](#)⁵ webpage, or see our [draft TEE guidance](#).⁶

Part 1 Site name and identifying information

Identify the Site being documented for an evaluation.

Site name:

Site address:

FSID:^a

VCP ID:^b

Part 2 Evaluator name and contact information

Provide the name and contact information for the person who conducted the evaluation.

Name:

Title:

Organization:

Mailing address:

City:

State:

Zip:

Email:

Phone:

^a Facility/Site ID (FSID) assigned by Ecology

^b Voluntary Cleanup Program (VCP) project ID assigned by Ecology



Part 3 Document evaluation type and results

3A Exclusion from further evaluation

3A-1 Does the Site qualify for an exclusion from further evaluation? (✓ one)

Yes (go to next question).

No or Unknown (go to [Section 3B](#)).

3A-2 What is the basis for the exclusion? (✓ all that apply, then skip to [Part 4](#))

Point of compliance: WAC [173-340-7491\(1\)\(a\)](#)

All soil contamination is, or will be, deeper than at least:*

15 feet below ground surface.

6 feet below ground surface or other Ecology-approved depth, and institutional controls are used to manage remaining contamination.

Barriers to exposure: WAC [173-340-7491\(1\)\(b\)](#)

All contaminated soil is, or will be, covered by physical barriers (e.g., buildings or pavement) that prevent exposure to plants and wildlife, and institutional controls are used to manage the remaining contamination.*

Undeveloped land: WAC [173-340-7491\(1\)\(c\)](#)

Less than 0.25 acres of contiguous[#] undeveloped land[±] are located on or within 500 feet of any area of the Site, and any of the following chemicals is present:

chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.

For sites not impacted by any of these chemicals, less than 1.5 acres of contiguous undeveloped land exists on or within 500 feet of any area of the Site.

Background concentrations: WAC [173-340-7491\(1\)\(d\)](#)

Concentrations of hazardous substances in soil do not exceed natural background levels defined in WAC [173-340-200](#)⁷ and WAC [173-340-709](#).⁸

* An exclusion based on future land use must have an Ecology-acceptable completion date for any future development.

Contiguous undeveloped land is not fragmented into smaller areas by highways, extensive paving, or similar structures that could hinder wildlife access to such areas.

± Undeveloped land is not covered by buildings, roads, pavement, or other barriers that would prevent wildlife from feeding on plants and other food sources in or on the soil.



3B Simplified evaluation

3B-1 Does the Site qualify for a simplified evaluation? (✓ one)

Yes (go to next question).

No or Unknown (skip to [Section 3C](#)).

3B-2 Did you conduct a simplified evaluation? (✓ one)

Yes (go to next question).

No (skip to [Section 3C](#)).

3B-3 Was further evaluation necessary? (✓ one)

Yes (go to next question).

No (go to [Question 3B-5](#)).

3B-4 If further evaluation was necessary, what did you do? (✓ one)

Used the [MTCA Table 749-2](#)⁹ concentrations as cleanup levels (skip to [Part 4](#)).

Conducted a site-specific evaluation (skip to [Section 3C](#)).

3B-5 If no further evaluation was necessary, what was the reason? (✓ all that apply, then skip to [Part 4](#)).

Exposure analysis: WAC [173-340-7492\(2\)\(a\)](#)

The total area of Site soil contamination is not more than 350 square feet.

The current or planned land use makes wildlife exposure unlikely, based on [MTCA Table 749-1](#).¹⁰

Pathway analysis: WAC [173-340-7492\(2\)\(b\)](#)

No potential exposure pathways from soil contamination to ecological receptors are complete.

Contaminant analysis: WAC [173-340-7492\(2\)\(c\)](#)

No contaminant listed in [MTCA Table 749-2](#) is, or will be, present from ground surface to 15 feet deep at concentrations that exceed the values listed in [MTCA Table 749-2](#).

No contaminant listed in [MTCA Table 749-2](#) is, or will be, present in the upper 6 feet (or alternative depth, if approved by Ecology) at concentrations that exceed the values listed in [MTCA Table 749-2](#), and institutional controls are used to manage remaining contamination.

No contaminant listed in [MTCA Table 749-2](#) is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate, as determined using Ecology-approved bioassay results.

No contaminant listed in [MTCA Table 749-2](#) is, or will be, present in the upper 6 feet (or alternative depth, if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate, as determined using Ecology-approved bioassay results, and institutional controls are used to manage remaining contamination.



3C Site-specific evaluation

A site-specific evaluation process consists of: 1) formulating the problem, and 2) selecting the methods for addressing the identified problem. Both parts require Ecology consultation and approval – see WAC [173-340-7493\(1\)\(c\)](#). For more information, see our [draft TEE guidance](#).

3C-1 Was there a problem? – see WAC [173-340-7493\(2\)](#)? (✓ one)

Yes (go to next question)

No (select the reason here, then go to 3C-5):

No issues were identified during the problem formulation step.

Issues were identified and resolved by cleanup actions for protecting human health.

3C-2 What did you do to resolve the problem? – see WAC [173-340-7493\(3\)](#)? (✓ one)

Used concentrations listed in [MTCA Table 749-3](#) as cleanup levels (go to [Question 3C-5](#)).

Used one or more methods listed in WAC [173-340-7493\(3\)](#) to evaluate and resolve the identified problem (go to next question).

3C-3 If you conducted further site-specific evaluations, what methods did you use – see WAC [173-340-7493\(3\)](#)? (✓ all that apply)

Literature surveys.

Soil bioassays.

Biomarkers.

Weight of evidence.

Site-specific field studies

Wildlife exposure model

Other Ecology-approved methods – please specify:

3C-4 What was the result of those evaluations? (✓ one)

No problems were identified.

Identified a problem and established site-specific cleanup levels.

3C-5 Has Ecology approved both your problem formulation and problem resolution steps? (✓ one)

Yes Identify the Ecology staff who approved those steps:

No (go to [Part 4](#)).



Email this completed form to the cleanup site manager assigned to your site.

ADA Accessibility

Ecology is committed to providing people with disabilities access to our information and services by meeting or exceeding the requirements of state and federal laws.

To request an ADA accommodation, email ecyadacoordinator@ecy.wa.gov, call (360) 407-7170, or call Ecology through the Washington Telecommunication Relay for services including text telephone (TTY) at 711 or through your preferred relay service provider. Visit Ecology’s [Accessibility & the Americans with Disabilities Act](#)¹⁵ webpage for more accessibility information.

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¹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true>
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¹¹ <mailto:VCP-NWRO@ecy.wa.gov>
¹² <mailto:VCP-SWRO@ecy.wa.gov>
¹³ <mailto:VCP-CRO@ecy.wa.gov>
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