

Rec'd by PML, 8/16/08



ENVIRONMENTAL 295 NE Gilman Blvd., Suite 201 Issaquah, Washington 98027 ph 425.395.0010 fax 425.395.0011
PARTNERS INC

July 12, 2007

Mr. Michael Hepp
Washington Department of Ecology
Water Quality
N. 4601 Monroe
Spokane, WA 99205-1295

Re: Safeway Fuel Station No. 3252
505 S. Pioneer Way
Moses Lake, WA

EPI Project No. 082203.4

Dear Mr. Hepp:

This letter is in response to your request during an earlier telephone conversation with Environmental Partners, Inc. (EPI's) Principal, Mr. Thom Morin, regarding the on-site ground water issues and the re-infiltration of ground water extracted from the subject property. The following is a brief summary of site conditions, environmental activities, and EPI's proposal for ground water management.

A retail gasoline sales and service station was located on the northern parcel of the subject property from 1955 to about 1980. In about 1980 the building was converted to a muffler shop with automobile service until the spring of 2006. The USTs for the former retail gasoline station were located in the northwestern portion of the subject property and were reportedly removed in the 1980's.

The southern parcel contained a drive-in motel from the mid-1950's until the early 1970's. The motel was demolished in the early 1970's and the parcel was left vacant until 1978. At that time, a Sambo's restaurant was constructed and operated on the parcel until the early 1980s. Godfather's Pizza has operated at the parcel from that time until the present date.

In June 2006, EPI performed a Baseline Environmental Assessment (BEA) at the subject property to document existing conditions prior to the property acquisition by Safeway, Inc. The assessment resulted in the detection of background concentrations of total dissolved arsenic of about 8.0 micrograms/liter ($\mu\text{g/L}$) in the ground water.

Based on findings from the assessment, and in support of Safeway's redevelopment of the subject property as a retail fuel station, EPI directed a remedial excavation of petroleum-impacted soils in June and July of 2007. The remedial excavation attained soil cleanup levels for petroleum hydrocarbons throughout the subject property. Prior to this work, the City of Moses Lake (City) approved EPI's proposed water management plan, which is attached for your review. As outlined in the plan, to facilitate excavation

operations EPI agreed to have ground water transferred from excavations into on-site settling tanks. EPI agreed to collect water samples and have each analyzed for contaminants of potential concern prior to returning the water to the ground water.

After the completion of these remedial excavations and prior to the new UST installation excavation, EPI excavated a test pit approximately 210 feet south of the northern property boundary and collected a ground water sample to further define the background arsenic concentrations. Laboratory analysis detected background arsenic concentrations of 10 µg/L, confirming the earlier result.

As observed in the June 2006 BEA and the July 2007 test pit, background arsenic levels were detected at concentrations between 8.0 µg/L and 10.0 µg/L. In order to properly and safely install the new USTs, the contractor requires the transfer of approximately 60,000 gallons of this ground water from the new UST excavation to the hydraulically up-gradient northern portion of the subject property. The water to be re-infiltrated has been treated through air sparging and is free of detectable hydrocarbons but contains dissolved arsenic at concentrations between 5.8 µg/L and 10.0 µg/L. These concentrations are consistent with local background concentrations. Re-infiltration of this water will not result in a degradation of local or regional water quality.

Figure 1 illustrates the site features and the orientation of the geologic cross-section illustrated in Figure 2. Please note that the buildings at 505 and 517 South Pioneer have been demolished and all building materials have been removed from the site.

The subject property will be subject to ongoing investigation and assessment of ground water quality which will include periodic analysis of arsenic.

Please provide us with Ecology's consent for on-site re-infiltration of the extracted ground water. This re-infiltration will be of short duration (i.e., through July 13, 2007) and of limited quantity (i.e., ~60,000 gallons) and will not result in environmental degradation.

Sincerely,



Dylan Galloway

Project Environmental Scientist

Enc: Planning Review Comments

cc: Mr. Bob Blair, Safeway
Ms. Sara Osborne, Safeway
= Mr. Phil Keehnel, Joe Hall Construction

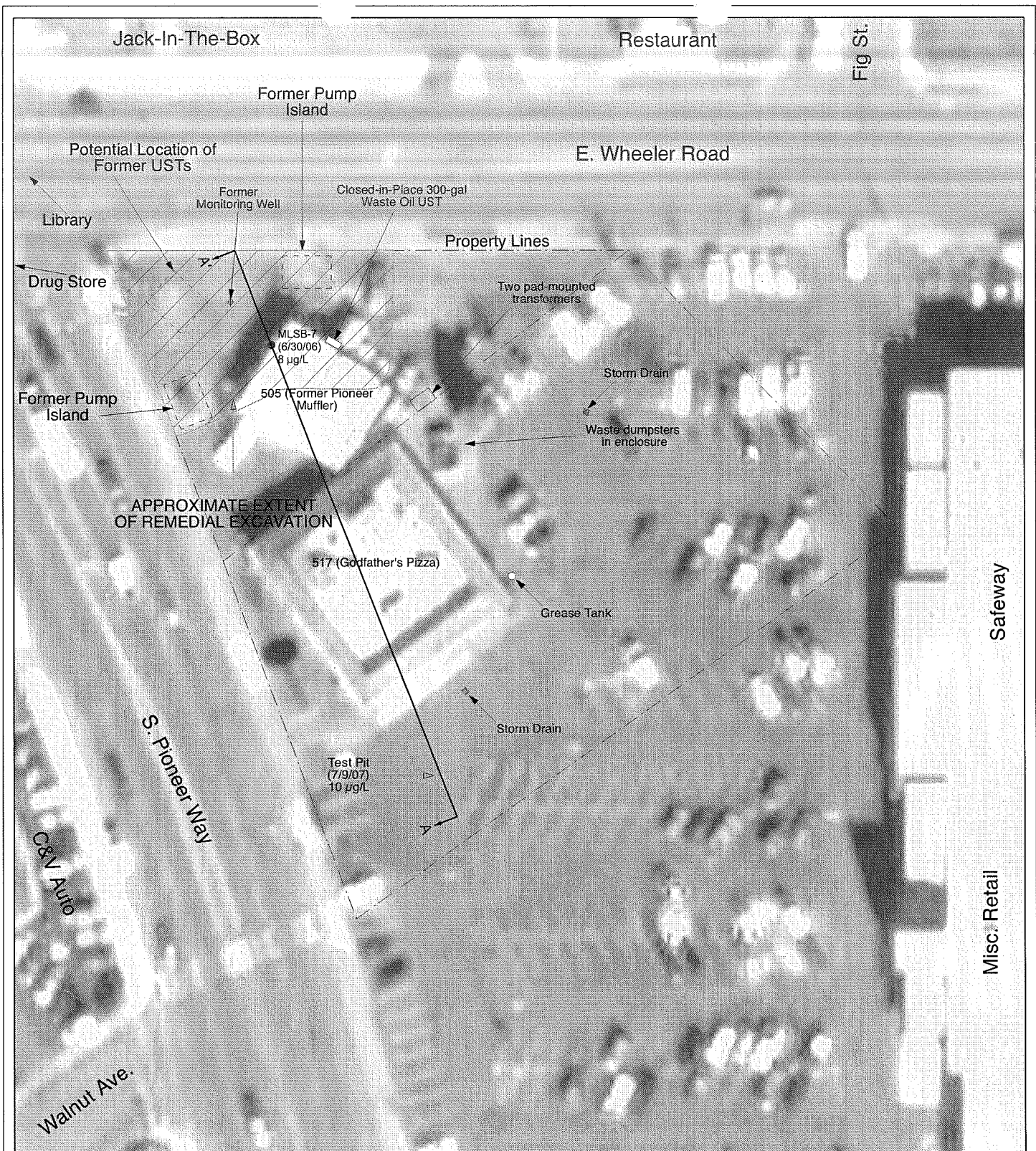
Table
 Summary of Analytical Results for Water Samples
 Safeway Fueling Center
 505 S. Pioneer, Moses Lake, Washington
 EPI Project No. 082203.4

	Sample Location	Sample Identification	Arsenic (µg/L)
Background	Center of Subject Property	MLSB-7	8.0
	Northwest Excavation	NWH2O	5.8
	Southwest Test Pit	SW-H2O	7.4
Re-infiltration Water	Baker Tank	BT-H2O	45 ^(a)
	Baker Tank	BT-H2O-2	7.8
	Baker Tank	BT-H2O-3	10.0

Notes:

All samples submitted to OnSite Environmental, Inc., Redmond WA for analysis.

(a) Spike likely due to non-filtered sample during intense agitation.



KEY:



SOURCE: GOOGLE MAPS, COPYRIGHT 2006
(PHOTO DATE UNKNOWN)
EPI OBSERVATIONS ON JUNE 26, 2006

SCALE: 1" = 50'



**ENVIRONMENTAL
PARTNERS INC.**

295 NE Gilman Boulevard, Suite 201
Issaquah, Washington 98027

FIGURE 1

SITE REPRESENTATION WITH RECENT
AERIAL PHOTOGRAPH

PROJECT	082203.4		
PREPARED FOR	SAFeway, INC.		
LOCATION	505 & 517 S. PIONEER WAY MOSES LAKE, WA		
SHEET 1 of 1	DRAWN BY ARM	REVIEWED BY DPG	DATE 07/11/07



June 5, 2007

Ms. Lori Barlow
City of Moses Lake
Community Development
321 South Balsam
P.O. Box 1579
Moses Lake, WA 98837

Re: Safeway Fuel Station No. 3252
Permit No. 20070037
517 S. Pioneer Way, Moses Lake, WA

EPI Project No. 082203.4

Dear Ms. Barlow:

This letter is in response to the City of Moses Lake (City) Planning Review Comments sent by the department of Planning Development to Angie Moffett of InForm, Inc. on May 4, 2007. The City requested a written proposed approach for dewatering during Underground Storage Tanks (UST) installation.

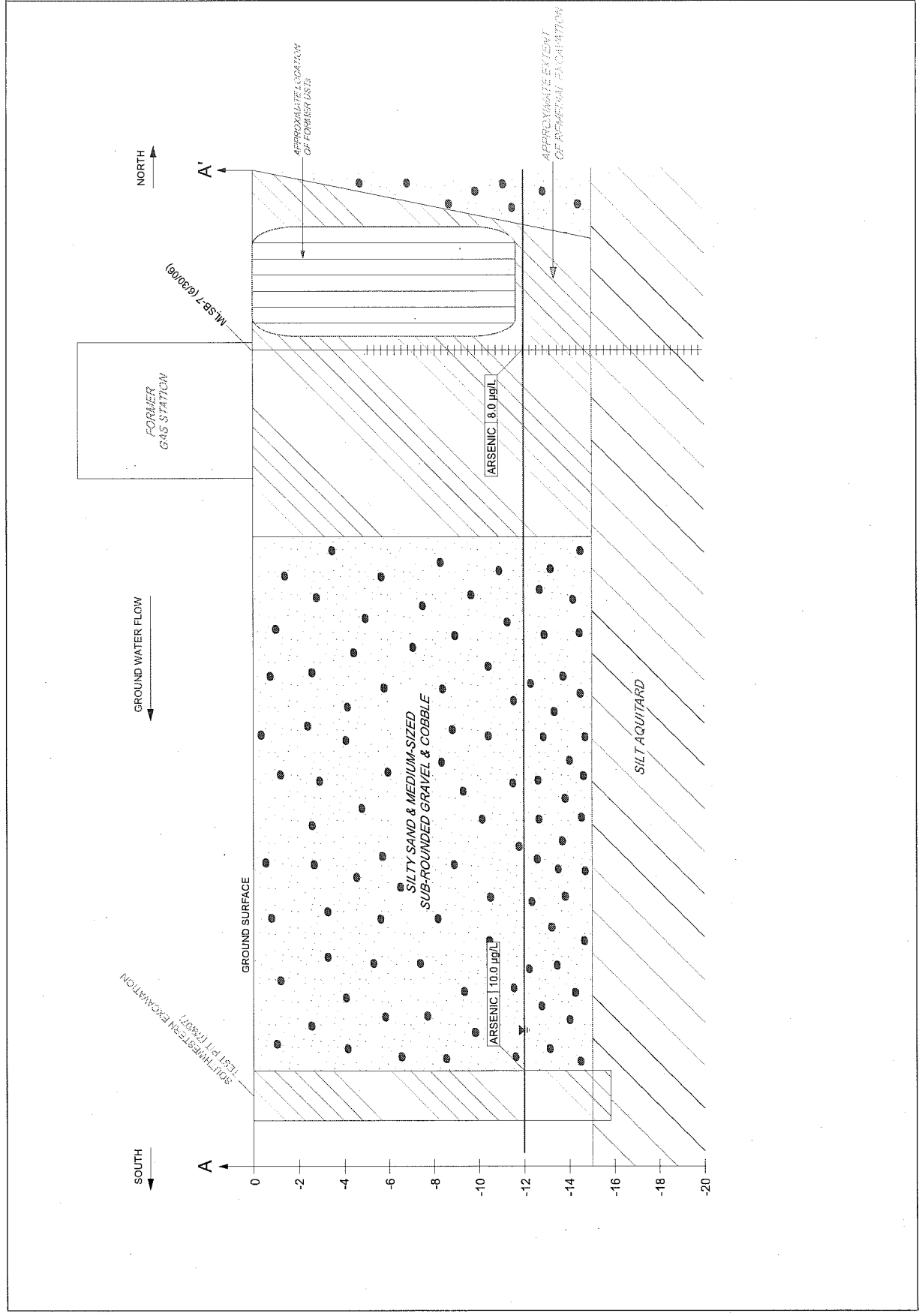
Under the Mitigated Determination of Non-Significance of the Planning Review Comments, the condition designated as Condition 5.C., states that "Installation of underground storage tanks will require dewatering of the area. Before the start of construction, the proponent shall submit to the City a proposal for the disposal of this water. The building permit shall not be issued until the Municipal Services Department has approved the method of disposal of the dewatering water." The purpose of this letter proposal is to serve as the above-said proposal requirement.

If ground water is encountered, and is found to impede the installation of new underground storage tanks, a sufficient amount of ground water will be pumped into a 21,000 gallon (or similar) settling tank. This tank will be plumbed to a second, similar sized tank where after a sufficient settlement period, overflow water from the first tank will gravity-feed to the second tank for continued storage. The water will then be discharged from the second tank to an on-site infiltration basin, which will be created prior to the UST installation. This approach returns water to the water table aquifer and conserves ground water resources.

In the event that on-site re-infiltration rates are not sufficient to sustain a workable UST installation, water may be discharged from the second storage tank to a nearby storm drain. Prior to discharge, water quality will be tested and monitored to ensure that it is in accordance with applicable local and state regulations.

Under a separate project, which will occur prior to the UST installation, the site will undergo soil and ground water remediation.

VERTICAL SCALE: 1"=4' HORIZONTAL SCALE: 1"=20'		CROSS SECTION A-A'		SHEET 1 OF 1		DRAWN BY ALM		REVIEWED BY DPG		DATE 07/11/07	
ENVIRONMENTAL PARTNERS INC. 295 NTE Office Building, Suite 201 Langston, Washington 20027		PREPARED FOR SAFEWAY, INC.		LOCATION 505 & 517 S. PIONEER WAY MOSES LAKE, WASHINGTON		PROJECT 082203.4		FIGURE 2		CROSS SECTION A-A'	



City of Moses Lake
EPI Project No. 082203.4
June 5, 2007

Later, if petroleum-impacts are detected in ground water pumped to accommodate the UST installation, this water will be air-sparged in the holding tanks, sampled, and analyzed by a certified laboratory prior to discharge. Such water will only be discharged once laboratory analyses confirm concentrations of petroleum impacts to be within allowable Model Toxics Control Act (MTCA) limits.

Please let me know if you have any questions or comments.

Sincerely,

Dylan Galloway
Project Environmental Scientist

Enc: Planning Review Comments

cc: Mr. Bob Blair, Safeway
Ms. Angie Moffett, InForm, Inc.
Mr. Phil Keehnel, Joe Hall Construction
Mr. Rich Cole, City of Moses Lake