

Draft Cleanup Action Plan

Tiki Car Wash

Facility Site ID: 2352

Cleanup Site ID: 5096

Prepared for:

Washington State Department of Ecology

Toxics Cleanup Program

Northwest Regional Office

Shoreline, Washington

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Project No. M0592.06.001

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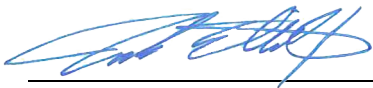
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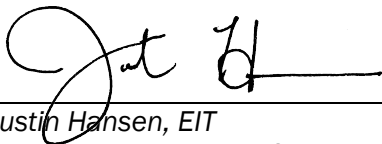
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*The material and data in this report were prepared
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Abbreviations

ARAR	applicable or relevant and appropriate requirement
bgs	below ground surface
BTEX	benzene, ethylbenzene, toluene, and total xylenes
CAP	cleanup action plan
CD	Consent Decree No. 93-2-07710
CFR	Code of Federal Regulations
the City	City of Bellevue
COC	contaminant of concern
CSM	conceptual site model
CUL	cleanup level
cy	cubic yard
DCA	Disproportionate Cost Analysis
Ecology	Washington State Department of Ecology
EDR	engineering design report
EFR	enhanced fluid recovery
FPS	feasibility pilot study
FS	feasibility study
ISCO	in situ chemical oxidation
MFA	Maul Foster & Alongi, Inc.
MTCA	Model Toxics Control Act
NPDES	National Pollutant Discharge Elimination System
POC	point of compliance
the Property	11909 NE 8th Street, Bellevue, Washington 98005
RAO	remedial action objective
RCRA	Resource Conservation and Recovery Act
RCW	Revised Code of Washington
RI	remedial investigation
SEPA	State Environmental Policy Act
the Site	Tiki Car Wash Site (Facility Site ID 2352, Cleanup Site ID 5096)
USC	United States Code
WAC	Washington Administrative Code

Executive Summary

This Cleanup Action Plan (CAP) presents the Washington State Department of Ecology's (Ecology's) proposed cleanup action for the Tiki Car Wash Site (Site), located at 11909 NE 8th Street in Bellevue, Washington (the Property) (Facility Site ID 2352; Cleanup Site ID 5096). The CAP was prepared under the Model Toxics Control Act (MTCA), Chapter 173-340 WAC, using the remedial investigation (RI) (Leidos 2023a), RI Amendment (MFA 2024a), feasibility study (FS) (MFA 2025b), and feasibility pilot study. It describes the proposed cleanup and the requirements the cleanup must meet. Ecology has preliminarily determined that a cleanup conducted in conformance with this CAP will satisfy the remedy-selection requirements of WAC 173-340-360. Ecology will consider public comments before issuing the final CAP.

Background

The Property has operated as a gasoline station, car wash, and convenience store since 1971. Historical petroleum releases affected soil and groundwater on the Property and on adjacent properties. Contaminants of concern are gasoline-range petroleum hydrocarbons; the sum of diesel- and oil-range petroleum hydrocarbons; and benzene, ethylbenzene, toluene, and total xylenes. Soil impacts occur from approximately 5 feet below ground surface (bgs) to greater than 15 feet bgs. Potential exposure pathways include direct contact with impacted soil, contact with or ingestion of groundwater, and vapor intrusion under future conditions. The Site meets the terrestrial ecological evaluation exclusion criteria, and available information indicates that surface water and sediment have not been affected.

Cleanup Action Overview

The Cleanup Action will address both On-Property and Off-Property portions of the Site. For the On-Property portion of the Site, the Cleanup Action will implement Ecology's petroleum model remedy by removing source soil within the Property boundary, generally to 15 feet bgs, with off-site disposal and clean backfill. Excavation dewatering will remove and treat impacted groundwater; an oxygen-release compound may be used for residual soil impacts. Free product at MW-31 will be removed.

For the Off-Property portion of the Site, the Cleanup Action will implement Alternative 2 from the FS: targeted excavation of approximately 3,200 cubic yards of accessible, highly contaminated soil south of the Property; in situ chemical oxidation (ISCO) for remaining soil and groundwater impacts; and groundwater monitoring. Two ISCO injection rounds over approximately 12 months are anticipated, with reagent type, dose, and limits refined during design.

Ecology will provide public notice and an opportunity to comment on the draft CAP. After reviewing comments, Ecology will issue the final CAP and publish its availability through the Site Register and other required notice methods.

1 Introduction

1.1 Purpose

This document is the Cleanup Action Plan (CAP) for the Tiki Car Wash Site (the Site) located in Bellevue, Washington. Tiki Car Wash is located at 11909 NE 8th Street in Bellevue, Washington (the Property). The general location of the Site is shown in Figure 1-1. The Site is defined by the extent of contamination caused by the release of hazardous substances from the Property. That portion of the Site not on the Property is termed the Off-Property portion of the Site in this report. The Site is listed in Ecology's cleanup database as Facility Site ID 2352 and Cleanup Site ID 5095.

A CAP is required as part of the site cleanup process under Chapter 173-340 Washington Administrative Code (WAC), Model Toxics Control Act (MTCA) Cleanup Regulations. The CAP was developed consistent with WAC 173-340-380, using information presented in the Remedial Investigation (RI), RI Amendment, and Feasibility Study (FS) prepared for the Site (Leidos 2023a, MFA 2024a, MFA 2025b).

The purpose of the CAP is to identify the proposed cleanup action for the Site and to provide an explanatory document for public review. More specifically, this CAP:

- Describes the Site
- Summarizes current site conditions
- Summarizes the cleanup action alternatives considered in the remedy selection process
- Describes the selected cleanup action for the Site and the rationale for selecting this alternative
- Identifies site-specific cleanup levels (CULs) and points of compliance (POCs) for each hazardous substance and medium of concern for the proposed cleanup action
- Identifies applicable state and federal laws for the proposed cleanup action
- Discusses compliance monitoring requirements and
- Presents the schedule for implementing the CAP

Ecology has made a preliminary determination that a cleanup conducted in conformance with this CAP will comply with the requirements for selection of a remedy under WAC 173-340-360.

1.2 Previous Studies

On June 7, 1990, Ecology received a report that a release of petroleum hydrocarbons may have taken place at the Property. Hart Crowser, on behalf of Tiki Enterprises, Inc., drilled one monitoring well and nine soil borings on the Property. Additionally, two monitoring wells, three test pits, and two soil borings were installed on the north end of the TRF Capital, LLC property. Analysis of the soil and groundwater samples collected from these locations indicated the presence of benzene, ethylbenzene, toluene, and total xylenes (BTEX) at concentrations exceeding MTCA Method A CULs.

A series of wells and soil borings were completed on the Site between 1992 and 1995. In 1993, Tiki Enterprises, Inc. and Ecology entered Consent Decree No. 93-2-07710 (CD) to investigate and remediate the Site.

In 1995, Ecology installed an air sparging and soil vapor extraction soil and groundwater remediation system as part of an interim action along the west and south edges of the Property. The system reportedly was prone to shutdowns due to water accumulation in the system's knockout drum. Operation of the air sparging/soil vapor extraction system was eventually discontinued sometime between 1996 (Leidos 2023a) and 2000 (EA 2008) due to a lack of funding.

In 2007, seven monitoring wells were installed on and off the Property and in 2008, an 8-hour enhanced fluid recovery (EFR) event was completed on the Property by Ecovac Services (EA 2007, 2008). EFR was performed using a vac truck at five monitoring well locations (MW-29, MW-31, MW-32, MW-33, and MW-35) to extract both vapor-phase hydrocarbons and groundwater from the wells. Ecovac Services reported that 103 pounds of petroleum hydrocarbons were removed during this field event, with vapor-phase hydrocarbon removal rates ranging from 0.6 to 45 pounds per hour (EA 2008).

In 2017, the State of Washington removed the lien on the Property and terminated the CD. Ecology then took over the cleanup responsibility for the Site. In 2022, Ecology initiated a new RI, performed by Leidos on behalf of Ecology (Leidos 2023a). MFA prepared an RI Amendment (MFA 2024a) to address the data gaps and omissions identified by Ecology following completion of the RI. MFA prepared the FS report (MFA 2025b) for the Site in December 2025.

1.3 Regulatory Framework

On March 29, 1993, Tiki Enterprises and Ecology entered into the CD, which outlined the remedial action to be performed to address contamination at the Site in three phases:

- Phase I: RI and FS
- Phase II: CAP, and
- Phase III: implementation of the CAP

On-Property and Off-Property investigation activities leading to the eventual RI are described in Section 1.2. In April 2023, Leidos completed the final RI report, documenting total petroleum hydrocarbon and BTEX impacts to soil and groundwater at the Site (Leidos 2023a). A draft FS was also prepared for the Site (Leidos 2023b) but was not finalized. In January 2024, MFA prepared an RI Amendment to address several data gaps and reporting omissions identified by Ecology following completion of the RI (MFA 2024a).

In March 2024, MFA prepared and submitted a work plan for a feasibility pilot study (FPS) to inform the applicability of groundwater circulation wells and in-well air stripping in the context of Site conditions (MFA 2024b). MFA completed the FPS activities and submitted a summary report to Ecology in January 2025 (MFA 2025a).

This CAP is intended to support the final remedy selection for the Site and was prepared consistent with Model Toxics Control Act requirements (WAC 173-340-351 through 380).

2 Site Description

2.1 Site History

The Property is located at 11909 NE 8th Street, Bellevue, Washington, on King County Parcel No. 3325059180. It is bordered to the north by NE 8th Street, to the east by a commercial building (Bassett Furniture), to the west by a car dealership (Infiniti of Bellevue), and to the south by the commercial buildings and parking on the TRF Capital, LLC property.

Since 1971, the Property has operated as a gas station, car wash, and convenience store. Four single-walled steel underground storage tanks historically existed at the Property: three installed in 1971 and the fourth installed in 1979. Current property features are included in Figure 2-1.

2.2 Human Health and Environmental Concerns

As described above, prior petroleum releases have impacted soil and groundwater at the Site. A conceptual site model (CSM) was prepared in the RI report (Leidos 2023a) with additional commentary provided in the RI Amendment (MFA 2024a). The CSM describing sources, release mechanisms, points of potential contact, exposure routes, and potential receptors is included in Figure 2-2.

Petroleum constituents have been identified in Site soil and groundwater at concentrations above CULs protective of human health. Therefore, soil and groundwater are impacted media. Based on available data, the soil vapor to indoor air pathway is incomplete currently. Most of the Site is paved and adjacent buildings are outside of the plume area. The complete and potentially complete exposure pathways associated with each medium are discussed in the following sections, with additional details provided in the RI, RI Amendment, and FS (Leidos 2023a; MFA 2024a, 2025b).

2.2.1 Human Receptors

Soil impacts extend from at least 5 feet below ground surface (bgs) to over 15 feet bgs. While the Property and a large majority of the Site is currently paved, soil could become an exposure pathway to future workers or residents if construction or development activities expose impacted soil. Impacted soil is considered to be a potential direct-contact exposure pathway. Potential human health receptors include:

- Occupational workers and/or residents (including visitors)
- Construction workers, and
- Excavation workers

Potable water is provided by the City of Bellevue (the City). The local perched aquifer is not used for domestic water supply and future uses of groundwater are not expected. Ecology's Well Log database does not contain records of any domestic-use wells within one mile of the Site (Ecology 2026). The nearest surface water body is Lake Bellevue, over 750 feet to the north of the Site. However, there are no environmental covenants for the properties that comprise the Site that restrict

the use of groundwater for drinking water. The following pathways are potentially complete for human health receptors (see Figure 2-2):

- Direct skin contact with, incidental ingestion of, and inhalation of windborne particulates from chemically impacted shallow soil.
- Inhalation of indoor air vapors emanating from soil or groundwater with volatile chemical impacts
- Dermal contact with, incidental ingestion of, or inhalation of vapors emanating from chemically impacted shallow groundwater encountered in excavations below the water table, or ingestion of groundwater, if used for potable water.

Quantitative and qualitative assessment of the available data, including soil vapor data from beneath the convenience store on the Property, discussed further in the RI Amendment (MFA 2024a), suggests that vapor intrusion risks to occupants of existing buildings both on-Property and off-Property are minimal and that additional field investigation was not required to address the identified vapor intrusion data gaps. The pathway is currently incomplete and could only become complete if a building was constructed absent remediation.

2.2.2 Ecological Receptors

As described in the FS (MFA 2025b), the Site is in an area that is zoned for commercial and residential use, and does not meet any of the criteria listed in WAC 173-340-741(2), so the Site satisfies the terrestrial ecological evaluation exclusion criteria and soil CULs do not need to be protective of terrestrial ecological receptors.

2.3 Cleanup Standards

2.3.1 Contaminants of Concern

Contaminants of concern (COCs) are discussed in the RI, RI Amendment, and FS, and include gasoline-, diesel-, and oil-range petroleum hydrocarbons and BTEX. These compounds were selected as COCs based on screening of analytical data obtained from soil and groundwater sampling where concentrations exceeded applicable MTCA CULs.

2.3.2 Cleanup Levels

CULs are selected to be protective of human health and the environment for each COC and impacted medium.

2.3.2.1 Soil

As soil contamination is limited to petroleum products and petroleum additives, and the Site is in an area that is zoned for commercial and residential use, MTCA Method A Unrestricted Land Use are appropriate. As described above, soil CULs do not need to be protective of terrestrial ecological receptors. Final CULs for soil, proposed as preliminary soil CULs in the FS and based on protection of potable water and soil leaching to groundwater, are as follows:

Table 2-1: CULs for Soil

COCs	Cleanup Level (milligrams per kilogram)	Cleanup Level Source
Benzene	0.0300	MTCA Method A CUL for Soil
Ethylbenzene	6.00	MTCA Method A CUL for Soil
Toluene	7.00	MTCA Method A CUL for Soil
Total xylenes	9.00	MTCA Method A CUL for Soil
Sum of diesel- and oil-range petroleum hydrocarbons	2,000	MTCA Method A CUL for Soil
Gasoline-range petroleum hydrocarbons	30.0	MTCA Method A CUL for Soil

2.3.2.2 Groundwater

Final CULs are based on the highest beneficial use and the reasonable maximum exposure expected to occur under both current and potential future Site use. Under WAC 173-340-720, drinking water is the beneficial use requiring the highest groundwater quality. Therefore, exposure to contaminants through ingestion and other domestic uses represents the reasonable maximum exposure for all sites unless the groundwater at a site can be demonstrated to be non-potable. Final CULs, proposed as preliminary groundwater CULs in the FS, are as follows:

Table 2-2: CULs for Groundwater

COCs	Cleanup Level (micrograms per liter)	Cleanup Level Source
Benzene	5.00	MTCA Method A CUL for Groundwater
Ethylbenzene	700	MTCA Method A CUL for Groundwater
Toluene	1,000	MTCA Method A CUL for Groundwater
Total xylenes	1,000	MTCA Method A CUL for Groundwater
Sum of diesel- and oil-range petroleum hydrocarbons	500	MTCA Method A CUL for Groundwater
Gasoline-range petroleum hydrocarbons	800	MTCA Method A CUL for Groundwater

2.3.3 Points of Compliance

According to the cleanup standards defined under MTCA, CULs must be attained at the point of compliance (POC) and must consider any additional regulatory requirements that may apply (WAC 173-340-200). The POCs for each media are described below.

2.3.3.1 Soil Points of Compliance

The soil POC is the point at which soil CULs shall be attained. The soil POC is established in soils throughout the Site.

2.3.3.2 Groundwater Points of Compliance

The standard groundwater POC extends throughout the Site from the uppermost level of the saturated zone to the lowest depth potentially affected. As described in the RI report (Leidos 2023a), the local perched aquifer is not currently used for drinking water and is not expected to be used for future domestic water supply. Compliance will be evaluated using a monitoring network which will include existing and future wells; specific monitoring wells to be sampled will be identified in the forthcoming engineering design report (EDR).

3 Description of the Selected Cleanup Action

3.1 Cleanup Action Alternatives

3.1.1 On-Property Model Remedy

The Property owners have expressed their desire to terminate operation of the existing business at the Property and prepare for redevelopment. Ecology has agreed to implement a model remedy of removing accessible petroleum contaminated soil within the Property boundary to the maximum extent practicable. For the purposes of this CAP, the anticipated excavation depth is approximately 15 feet bgs, corresponding generally to the top of the low-permeability glacial till. The final excavation limits will be refined during design and implementation based on geotechnical constraints, field conditions, confirmation sampling, and Ecology approval. If soil contamination remains at the base of the excavation, an oxygen release compound may be placed in the excavation area prior to backfill.

3.1.2 Off-Property Cleanup Action Alternatives, Analysis, and Selection

The FS presented six alternatives to address soil and groundwater contamination on the Off-Property portion of the Site and meet remedial action objectives (RAOs) (MFA 2025b). The alternatives were arranged in order from most to least permanent to allow for straightforward incorporation into the Disproportionate Cost Analysis (DCA) methodology and procedures under MTCA (WAC 173-340-360(5)(c)). The cleanup action alternatives employ combinations of active and passive remedial technologies to eliminate or manage current and potential future exposure to contaminated media in the Off-Property portion of the Site. The cleanup action alternatives are summarized in Table 3-1 and are described in detail in the FS.

- Alternative 1: Excavation and Off-Site Disposal of Soil Impacts, In Situ Treatment
- Alternative 2: Targeted Soil Excavation and In Situ Treatment
- Alternative 3: In Situ Treatment
- Alternative 4: Recirculating Wells/In-Well Air Stripping
- Alternative 5: Institutional Controls and Monitored Natural Attenuation

- Alternative 6: No Action

The six alternatives were screened using MTCA requirements provided in WAC 173-340-360 and evaluated according to the DCA to compare the costs and benefits of the cleanup alternatives to identify the alternative that is permanent to the maximum extent practicable (Ecology 2025).

Threshold requirements include the following:

- Protect Human Health and the Environment
- Comply with Cleanup Standards
- Comply with Applicable State and Federal Laws
- Prevent or Minimize Present and Future Releases
- Provide Resilience to Climate Change Impacts
- Provide Compliance Monitoring
- Not Rely Primarily on Institutional Controls and Monitoring
- Not Rely Primarily on Dilution and Dispersion
- Provide for a Reasonable Restoration Time Frame
- Use Permanent Solutions to the Maximum Extent Practicable
- Public Concerns

Alternatives 5 and 6 were eliminated from further analysis as they did not meet the threshold requirements identified above. Alternatives 1 through 4 were evaluated through the DCA process using the following ranking criteria:

- Protectiveness
- Permanence
- Effectiveness Over the Long Term
- Management of Implementation Risks
- Technical and Administrative Implementability
- Cost

The DCA is described in Section 3.2.7 of the FS (MFA 2025b). Ecology has selected Alternative 2 as the cleanup action for the Off-Property portion of the Site (see Figure 3-1). Additional soil and groundwater sampling is planned to further inform design, and sampling results will be presented in the EDR.

3.2 Description of the Selected Cleanup Action

3.2.1 On-Property Model Remedy

The selected cleanup action for the On-Property portion of the Site is implementation of an Ecology-approved model remedy. Full soil removal to 15 feet bgs is expected to generate up to approximately 16,000 cubic yards (cy) of petroleum-contaminated soil at a cost of approximately \$11,370,000.

An evaluation of the eligibility criteria for the model remedy provides the following:

- Geographic Area: The Site is in Washington State.
- Release Confirmation and Ecology Notification: Ecology has been notified of the release.
- Affected Media: Site characterization activities to date confirm that neither surface water nor sediment have been impacted by the release. As described in the RI (Leidos 2023a), the groundwater to surface water pathway is precluded because the nearest surface water body (Lake Bellevue) is over 750 feet north and upgradient of the Site.
- Contaminant Types: Contaminant types are limited to compounds typically found in petroleum products. The COCs for the Site are described in the RI (Leidos 2023a), RI Amendment (MFA 2024a), FS (MFA 2025b), and Section 2.3.1 of this CAP, and are consistent with this criterion.
- Emergency/Interim Actions: Emergency or interim actions are not required at this time.
- TEE: The Site satisfies the TEE exclusion criteria, as described in Section 2.2.2 and the FS (MFA 2025b).
- Remedy Selection:
 - The primary remedy selection is source removal within the Property boundary followed by the placement of clean backfill. Impacted soil will be disposed of at a permitted Washington Class 2 or Resource Conservation and Recovery Act (RCRA) Subtitle D Landfill.
 - Secondary remedy components include the removal and treatment of groundwater during excavation dewatering and may include enhanced aerobic degradation for the treatment of residual soil contamination through the placement of an oxygen release compound prior to placement of backfill.
- Impacts to Water Supply Wells: As described above, there are no domestic water supply wells within one mile of the Site, and the Site has not caused impacts above a practical quantitation limit to a well that is used for drinking water purposes.
- Proximity to Private Wells: There are no known private wells within 250-feet of the Site.

After implementing the model remedy, the following criteria will be met:

- Free Product Removal: Recoverable free product observed during the FPS in the central portion of the Property at MW-31 will be removed during excavation within the Property boundary.
- Soil: Petroleum-contaminated soil removal and offsite disposal will satisfy the soil RAO and the compliance criteria at the soil POC.
- Groundwater: Groundwater removal and treatment during excavation and dewatering operations will capture petroleum-contaminated groundwater within the Property boundary, satisfying the groundwater RAO. Disturbed construction residuals may be treated through enhanced aerobic degradation.

3.2.2 Off-Property Selected Cleanup Action

The selected cleanup action for the Off-Property portion of the Site includes the following key elements:

- Targeted Soil Excavation
- In Situ Treatment
- Groundwater Monitoring

3.2.2.1 Targeted Soil Excavation

Accessible soil with the highest concentrations of contaminants (south of the Property, roughly between MW-30, MW-35, and MW-38) will be excavated. Utilities (stormwater and water) will be temporarily managed within the excavation area. Approximately 3,200 cy of soil will be excavated from the area shown in Figure 3-1. This area was selected to include soil with the highest concentrations of contaminants in the Off-Property portion of the Site while minimizing impacts to significant utilities to the east and west of the excavation. The area and depth of excavation will be further refined by design-phase sampling. The excavated soil will be disposed of at a permitted Washington Class 2 or RCRA Subtitle D landfill. The excavated areas will be backfilled with imported, clean structural fill and surface features (e.g. asphalt, concrete sidewalk, curbs and gutters, and other parking lot features) and utilities will be restored.

3.2.2.2 In Situ Treatment

Areas with soil and groundwater concentrations exceeding CULs outside of the excavation footprint (see Figure 3-1) will be treated by in situ chemical oxidation (ISCO). Because ISCO will be used to address soil impacts as well as groundwater, two rounds of injections over a period of 12 months are expected. The specific ISCO reagents and dosing will be further refined during design.

3.2.2.3 Groundwater Monitoring

Groundwater monitoring will be used to assess remedy effectiveness. The existing monitoring well network, augmented by three additional monitoring wells that will be installed as part of design-phase sampling, will be used for the points of compliance. Specific monitoring wells to be sampled will be identified in the forthcoming EDR. Compliance monitoring will begin no sooner than six months after the last ISCO injections and will continue until groundwater concentrations meet CULs (for at least four quarters of monitoring).

3.3 Applicable or Relevant, and Appropriate Requirements

Cleanup actions must comply with applicable or relevant and appropriate requirements (ARARs). ARARs are contaminant-, location-, and action-specific, as defined in the following paragraphs. Remedial actions conducted by Ecology are exempt from the procedural requirements of certain state and local laws (WAC 173-340-710[9][b]). Ecology will ensure compliance with substantive requirements and will provide an opportunity for comment by the public and by the state agencies and local governments that would otherwise implement these laws. Potential regulations are evaluated in Table 3-2, and expected applicable regulations are listed below.

3.3.1 Contaminant-Specific Regulations

Contaminant-specific regulations are usually health- or risk-based numerical values or methodologies that, when applied to site-specific conditions, result in the establishment of numerical

contaminant values that are recognized by regulatory agencies as protective of human health and the environment. Applicable contaminant-specific regulations include:

- **Washington State MTCA.** MTCA (Revised Code of Washington [RCW] 70A.305; WAC 173-340) regulates soil and groundwater CULs.

3.3.2 Action-Specific Regulations

Action-specific regulations are relevant to specific cleanup action methods and technologies, and to actions conducted to support cleanup. Action-specific regulations dictate how certain activities, such as treatment, disposal practices, and media monitoring programs, must be conducted. Anticipated applicable action-specific regulations include:

- **National Pollutant Discharge Elimination System (NPDES).** WAC 173-220 establishes a state permit program, applicable to the discharge of pollutants and other wastes and materials to the surface waters of the state, operating under state law as a part of NPDES created by Section 402 of the federal Water Pollution Control Act. NPDES construction stormwater permits are required for construction sites of one acre or larger (WAC 173-220).
- **Clean Air Act.** The United States Clean Air Act (42 United States Code [USC] § 7401 et seq. and 40 Code of Federal Regulations [CFR] Part 50) and Washington Clean Air Act and Implementing Regulations (RCW 70A.15; WAC 173-400) to protect ambient air quality by limiting air emissions and taking reasonable precautions to prevent fugitive dust from becoming airborne, which are applicable to cleanup action alternatives involving construction and soil handling.
- **RCRA.** 42 USC § 6901 et seq., Subtitle D—Managing Municipal and Solid Waste (40 CFR Parts 257 and 258), and Washington Solid Waste Handling Standards (RCW 70A.205; WAC 173-350) to establish guidelines and criteria for management of non-hazardous solid waste, which are applicable to cleanup action alternatives involving off-Site disposal of contaminated soil designated as non-hazardous waste. Washington Solid Waste Handling Standards (RCW 70.95; WAC 173-351 and 173-304) establish minimum standards for handling and disposing of solid waste, including contaminated soils, construction and demolition debris, and garbage generated during site remediation.
- **Federal Occupational Safety and Health Administration.** Regulations pertaining to hazardous waste sites are addressed under 29 CFR 1910.120, the Hazardous Waste Operations and Emergency Response Standard. This standard applies to cleanup and corrective actions, as well as to operations involving hazardous wastes that are conducted at permitted treatment, storage, and disposal facilities, unless the employer can demonstrate that the operations do not involve employee exposure or the reasonable possibility of employee exposure to safety or health hazards.
- **Washington Industrial Safety and Health Act.** Regulations pertaining to hazardous waste sites are addressed under hazardous waste operations (RCW 49.17; WAC 296-24). This standard applies to cleanup and corrective actions at MTCA-regulated sites.
- **Underground Injection Control.** WAC 173-218 prescribes regulations for cleanup actions that include injection of biological or chemical oxidants into injection wells or trenches.
- **Washington State Environmental Policy Act (SEPA).** The State of Washington administers and enforces a program equivalent to the federal National Environmental Policy Act. SEPA (RCW 43.21C) provides the framework for agencies to consider the environmental consequences

of a proposal before acting. It also gives agencies the ability to condition or deny a proposal because of identified likely significant adverse impacts. The act is implemented through the SEPA Rules and Procedures (WAC 197-11).

- **Land-Disturbing Activity.** City Code 23.76.035 requires a permit for fill and/or excavation totaling over 50 cy.
- **Minimum Standards for Construction and Maintenance of Wells.** Washington State has developed minimum standards for the construction of water and monitoring wells and the decommissioning of wells (RCW 18.104; WAC 173-160).

3.3.3 Location-Specific Regulations

Location-specific regulations are restrictions placed on the concentration of hazardous substances or the conduct of activities solely because they are in a specific location. Some examples of special locations are floodplains, wetlands, historic sites, and sensitive ecosystems or habitats. Applicable location-specific regulations include:

- **U.S. Archaeological and Historic Preservation Act.** The Archaeological and Historic Preservation Act (16 USC § 469, 470 et seq.; 36 CFR Parts 65 and 800) and Washington Archaeological Sites and Resources regulations (RCW 27.44, 27.48, and 27.53; WAC 25-48) establish requirements to preserve and recover significant artifacts, preserve historic and archaeological properties and resources, and minimize harm to national landmarks.

3.4 Additional Requirements

3.4.1 Climate Resilience

The selected cleanup action was evaluated for climate resilience in accordance with WAC 173-340-360(3)(a)(v). The regulation requires resilience to climate change impacts that have a high likelihood of occurring and severely compromising long-term effectiveness. These impacts may include increased precipitation and flooding (which may change groundwater elevations), drought, wildfire, and extreme heat. The selected cleanup action is highly resilient to these possible future impacts because excavation and offsite disposal will physically remove the highest contaminant concentrations, while ISCO will chemically destroy residual contamination outside of the excavation footprint. The selected cleanup action is consistent with Ecology's 2025 *Guidance for Making Cleanups Permanent to the Maximum Extent Practicable*, does not rely on containment or institutional controls, and is expected to remain effective under foreseeable future climate conditions. In addition to its permanence, the timeframe for implementation and restoration of the selected cleanup action is shorter than other available alternatives (e.g., recirculating wells).

3.4.2 Environmental Justice

In 2023, Ecology adopted amendments to MTCA which included strengthening environmental justice principles when prioritizing and cleaning up contaminated sites (Ecology 2023). Consistent with WAC 173-340-360(3)(a)(i), the selected cleanup action is protective of likely vulnerable populations and overburdened communities. By physically removing the most impacted source material and chemically destroying residual contamination through ISCO, the selected cleanup action mitigates potential exposure pathways and provides long-term benefits to future Site occupants under an

unrestricted land use scenario. Public participation activities are ongoing and Ecology will consider community concerns and potential disproportionate impacts throughout cleanup and restoration.

3.5 Restoration Time Frame

The selected cleanup action has a reasonable restoration time frame based on the following factors:

- Excavation and off-site disposal of contaminated soil will immediately remove contaminant mass from the Property and from the targeted excavation area in the Off-Property portion of the Site.
- Groundwater dewatering during excavation will remove contaminant mass in groundwater. Groundwater will be treated prior to discharge, likely to the sanitary sewer.
- ISCO injections are expected to destroy petroleum contaminant mass in the Off-Property portion of the Site within 1 to 2 years. Groundwater monitoring will be conducted to verify that excavation and ISCO injections have reduced contaminant mass such that groundwater concentrations are at or below CULs. A municipal drinking water source is readily available and there is no immediate need for development of a domestic water supply.
- The implementation period for excavation, dewatering, and the first round of ISCO injections is estimated to take three to six months. The anticipated second round of ISCO injections will not begin until at least six months after the first round of ISCO injections.

3.6 Cleanup Compliance

3.6.1 Compliance Monitoring

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

Groundwater monitoring for the Site will include performance and confirmation monitoring. A groundwater monitoring plan will be prepared as part of the future EDR. The groundwater monitoring plan is expected to include performance monitoring after each round of ISCO injections and confirmation monitoring for at least four quarters following ISCO injections and successful performance monitoring results.

3.6.2 Restoration Progress and Contingency

Contingency actions will be implemented if performance or confirmation monitoring data indicates that the selected cleanup action has not consistently achieved RAOs. Additional ISCO injections may be required if contaminant concentrations in groundwater increase or remain above CULs.

3.7 Schedule for Implementation

An anticipated schedule of actions and deliverables is provided in Table 3-2 below, where durations are provided for discussion and planning purposes only. Implementation of the selected cleanup action is likely to take two years. Cleanup implementation will begin as described in the final EDR.

Table 3-3: Anticipated Cleanup Action Implementation Schedule

Implementation Step	Estimated Time Frame
EDR	An EDR will be prepared following issuance of this CAP. Anticipated in early 2027.
Construction Plans and Specifications	Construction plans and specifications will be completed following Ecology approval of the final EDR. Anticipated by June 2027.
Bid Phase	Anticipated summer 2027.
Cleanup Action Implementation	Anticipated 2027 – 2028
Compliance Monitoring	Beginning no sooner than six months after the final ISCO round

3.8 Institutional/Engineering Controls

The selected cleanup action does not rely on permanent engineering controls to achieve compliance with MTCA cleanup standards. The primary components of the remedy include excavation and off-site disposal of petroleum-impacted soil and ISCO treatment of residual contamination remaining outside the excavation limits. The selected remedy does not require permanent engineering controls, containment systems, environmental covenants, or restrictions on future property use to achieve protectiveness.

Temporary engineering controls will be implemented during remedy construction as necessary to protect workers, the public, and the environment. Such controls may include excavation shoring, erosion and sediment controls, dust suppression, stormwater management measures, and treatment system monitoring. These controls are intended solely to facilitate implementation of the cleanup action and are not required as long-term components of the remedy.

3.9 Public Participation

Public notice and opportunity for comment on the draft CAP will be provided as required in WAC 173-340-600(14). Ecology will provide a minimum 30-day comment period. After review and consideration of the comments received during the public comment period, a final CAP will be issued, with its availability published in the Site Register and local newspaper(s).

References

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- Ecology. 2023. *MTCA Cleanup Rulemaking, Chapter 173,340 WAC, Adopted Rule*. Washington State Department of Ecology, Olympia, Washington. August 23.
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- MFA. 2024a. *Remedial Investigation Amendment, Tiki Car Wash, Facility Site ID: 2352, Cleanup Site ID: 5096*. Prepared for the Washington State Department of Ecology, Toxics Cleanup Program, Northwest Regional Office, Shoreline, Washington. Maul Foster & Alongi, Inc.: Seattle, WA. January 26.
- MFA. 2024b. *Work Plan for Feasibility Pilot Study, Tiki Car Wash, Facility Site ID: 2352, Cleanup Site ID: 5096*. Prepared for the Washington State Department of Ecology, Toxics Cleanup Program, Northwest Regional Office, Shoreline, Washington. Maul Foster & Alongi, Inc.: Seattle, WA. March 14.
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MFA. 2025b. *Feasibility Study, Tiki Car Wash, Facility ID: 2352, Cleanup Site ID: 5096*. Prepared for the Washington State Department of Ecology, Toxics Cleanup Program, Northwest Regional Office, Shoreline, Washington. Maul Foster & Alongi, Inc.: Seattle WA. December 12.

Limitations

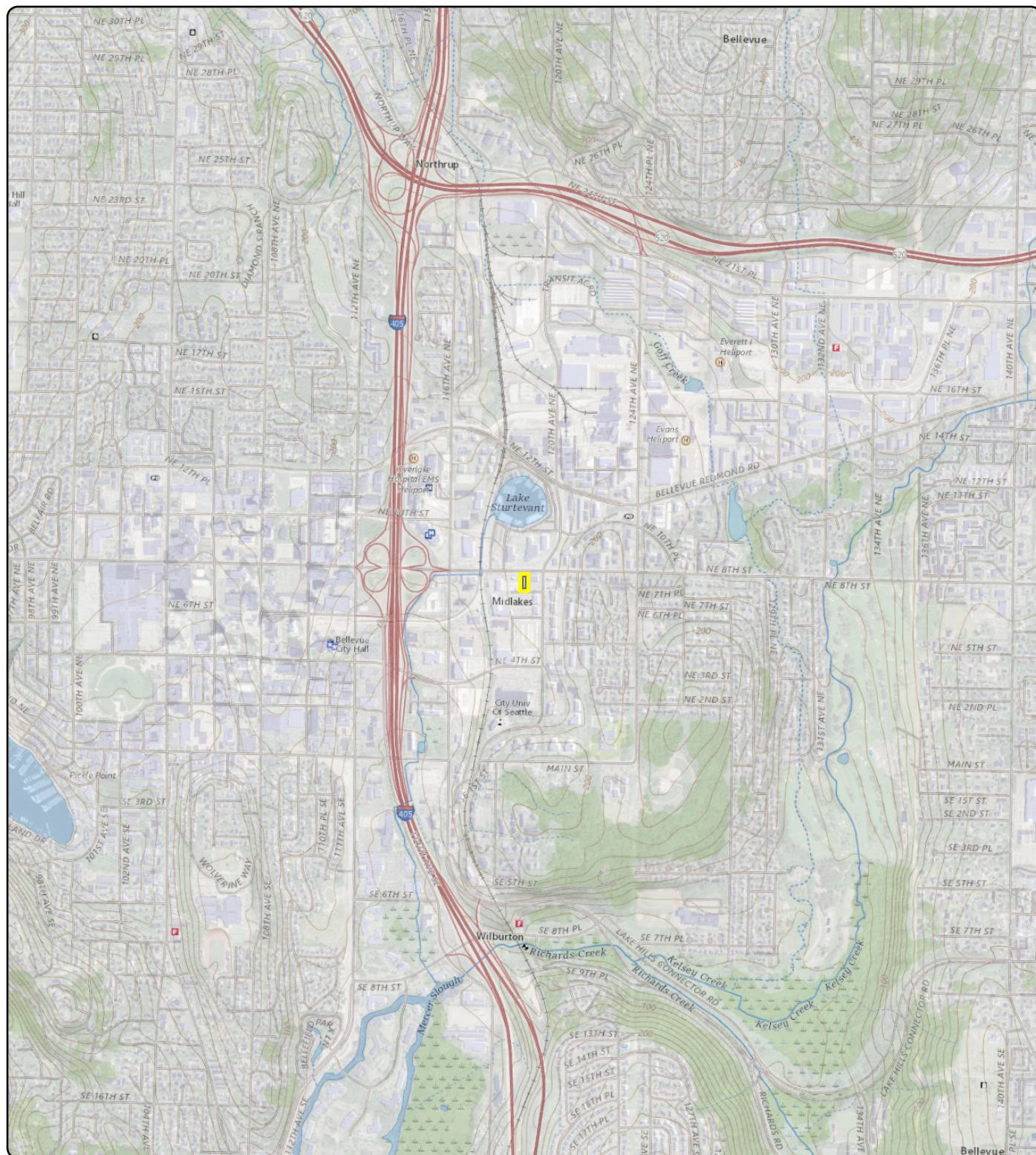
The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Figures



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Notes

U.S. Geological Survey 7.5-minute topographic
quadrangle (2020): Mercer Island.
Township 25 north, range 5 east, section 33.

Data Source

Boundary for parcel 3325059180 obtained from King County.



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Legend



Property Boundary

Figure 1-1 Vicinity Map

Tiki Car Wash
11909 NE 8th Street
Bellevue, WA

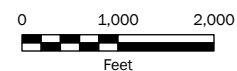




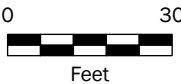
Figure 2-1
Property Features

Tiki Car Wash
11909 NE 8th Street
Bellevue, WA

Legend

-  Monitoring Well
-  UST (Approximate)
-  Property Boundary
-  Parcel

Notes
UST = underground storage tank.

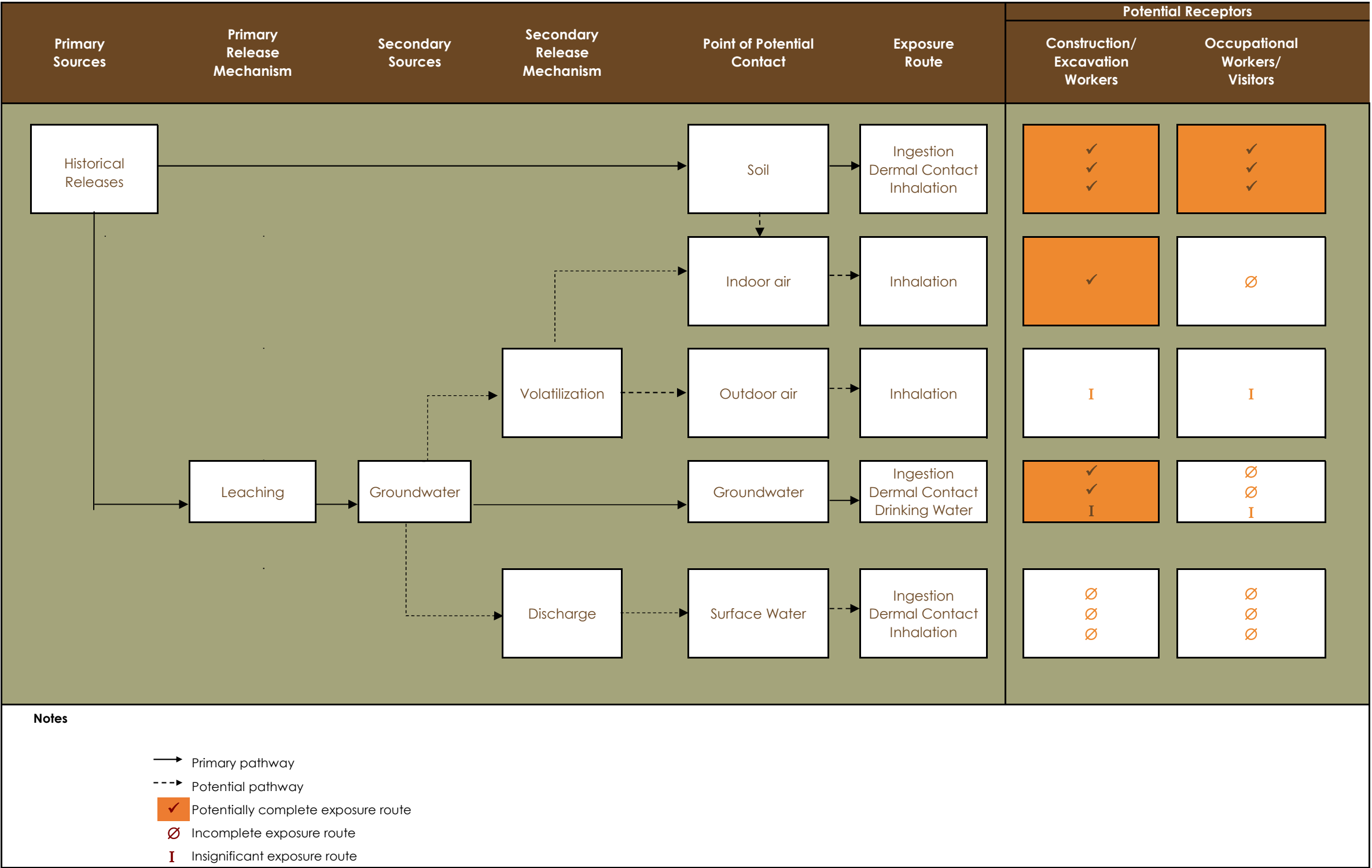


Data Sources
Aerial photograph obtained from Google; parcel data obtained from King County; approximate UST locations obtained from *Report of May 1996 Groundwater Sampling and Analysis* (Enviros 1996).

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Figure 2-2
Conceptual Site Model
Tiki Car Wash Site, Bellevue, Washington
Washington State Department of Ecology



Path: X:\O_MFL Projects\M0592\06\001\Pro\M0592_06_001_Remediation_Alternatives.aprx Fig 3-1 Selected Cleanup Action
Print Date: 9/21/2026
Reviewed By: Hansen
Produced By: sturner
Project: M0592_06_001

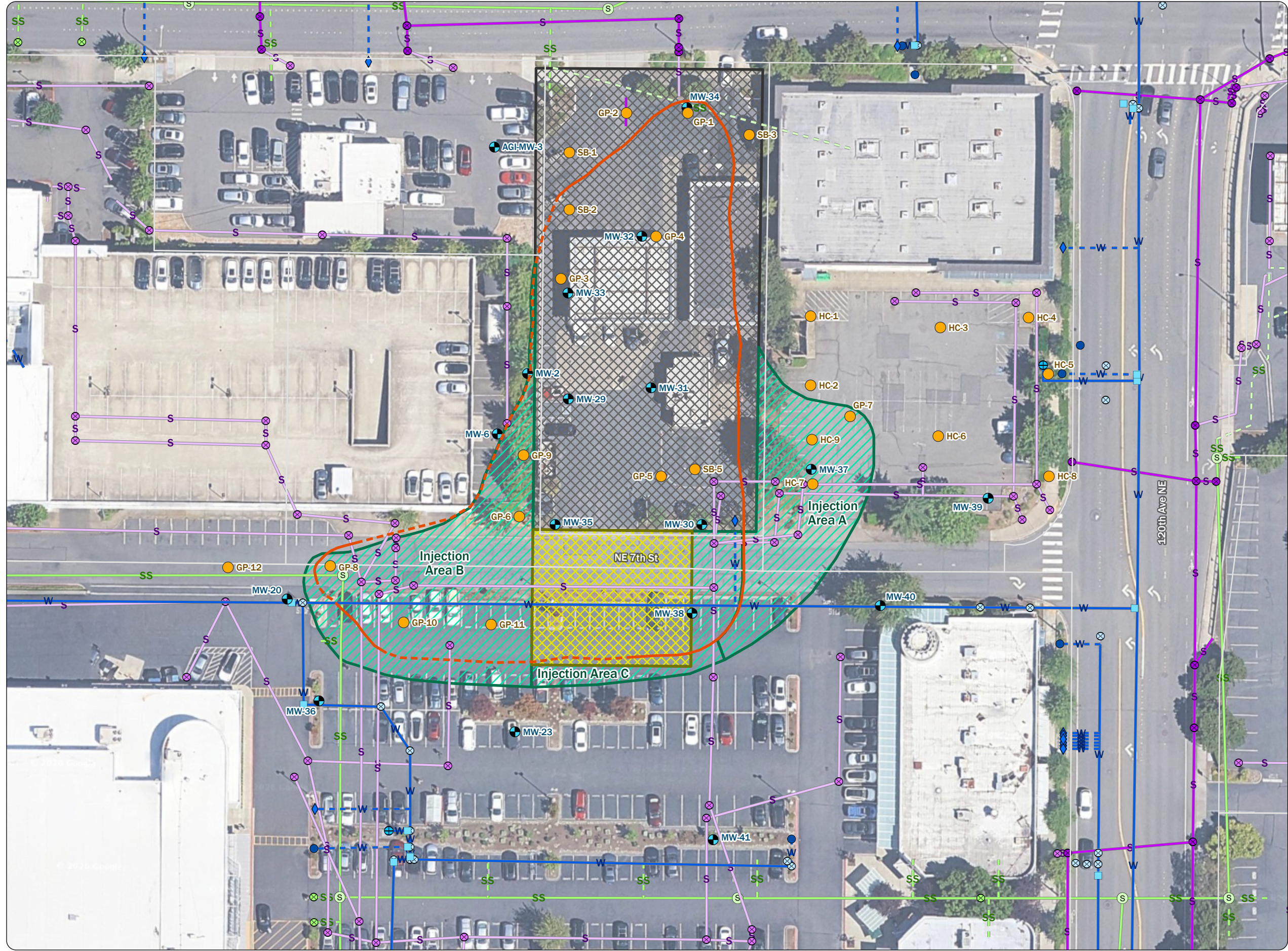


Figure 3-1
Selected Cleanup Action

Tiki Car Wash
11909 NE 8th Street
Bellevue, WA 98005

Legend

- Injection Area
- Excavation Area
- Excavation to 15 feet Below Ground Surface
- Monitoring Well
- Soil Boring/Temporary Well

Approximate Extent of Soil Contamination

- Inferred Boundary
- Boundary

Water Utilities

- Valve
- Connection
- Hydrant
- Fitting
- Control Valve
- Lateral Line
- Main

Stormwater Utilities

- Structure
- Private Structure
- Private Gravity Main
- Gravity Main

Sanitary Sewer Utilities

- Manhole
- Fitting
- Private Lateral Line
- Lateral Line
- Gravity Main
- Parcel

0 40
Feet



Data Sources
Aerial photograph (2025) obtained from Google; parcel data (2025) obtained from King County; sample locations (2023) obtained from Leidos; utilities (2025) obtained from the City of Bellevue.

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Tables



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Table 3-1
Cleanup Action Alternatives
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology

Alternative	Title	Key Elements	Summary Description
1	Excavation and Off-Site Disposal of Soil Impacts, In Situ Treatment	Excavation, in-situ treatment, and groundwater monitoring	Excavation and offsite disposal of approximately 9,600 cy of soil above CULs. Use ISCO to treat groundwater outside of the soil excavation footprint to mitigate groundwater exceedances and monitor groundwater to evaluate remedy performance and progress toward CULs.
2	Targeted Soil Excavation and In Situ Treatment	Excavation, in-situ treatment, and groundwater monitoring	Excavation and offsite disposal of approximately 3,200 cy of soil above CULs. Use ISCO to treat groundwater outside of the soil excavation footprint to mitigate groundwater exceedances and monitor groundwater to evaluate remedy performance and progress toward CULs.
3	In Situ Treatment	In situ treatment, groundwater monitoring, institutional controls	Use ISCO to treat contamination and conduct groundwater monitoring to evaluate remedy performance. Implement institutional controls to prevent exposure to contaminated soil remaining above CULs.
4	Recirculating Wells/In-Well Air Stripping	Recirculating wells with IWAS, and groundwater monitoring.	Installation of recirculating wells with IWAS to treat contamination via active groundwater recovery and treatment to mitigate groundwater and soil exceedances of CULs, and groundwater monitoring to evaluate remedy performance and progress toward CULs.
5	Institutional Controls and Monitored Natural Attenuation	Institutional controls and monitored natural attenuation	Implement institutional controls to document Site conditions and prevent exposure, including groundwater-use restrictions, cap inspection and maintenance requirements, and a site management plan establishing procedures for handling contaminated media. Conduct groundwater monitoring to evaluate natural attenuation and contaminant trends.
6	No Action	--	--

Table 3-1
Cleanup Action Alternatives
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology



Notes
Complete descriptions of each cleanup alternative are provided in the Feasibility Study for the Site.
CUL = cleanup level.
cy = cubic yard.
ISCO = in situ chemical oxidation.
IWAS = in-well air stripping.
Site = Tiki Car Wash site (Facility Site ID 2352, Cleanup Site ID 5096),

Table 3-2
Potential Regulations
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology

Authority	Resource	Implementing Laws/Regulations	Applicable	Applicability
Contaminant-Specific				
State	Soil	Washington State MTCA (RCW 70A.305; Chapter 173-340 WAC)	Yes	MTCA soil cleanup levels are applicable.
State	Groundwater	Washington State MTCA (RCW 70A.305; Chapter 173-340 WAC)	Yes	MTCA groundwater cleanup levels are applicable.
State	Indoor Air	Washington State MTCA (RCW 70A.305; Chapter 173-340 WAC)	Yes	MTCA indoor air cleanup levels are applicable.
Federal	Drinking Water	National Primary Drinking Water Regulations	Yes	National primary drinking water regulations are applicable for benzene, ethylbenzene, toluene, and xylenes. MTCA method A groundwater cleanup levels are equal to or more protective than the National Primary Drinking Water Regulations
Action-Specific				
Federal/State	Surface Water	National Pollutant Discharge Elimination System (NPDES) Federal Water Pollution Control Act (CWA; 33 USC § 1342, Section 402) and Implementing Regulations Washington State Construction Stormwater General Permit (RCW 90.48; Chapter 173-220 WAC)	Yes	The NPDES program establishes requirements for point source discharges, including stormwater runoff. These requirements would be applicable for any point source discharge of stormwater during construction or following cleanup.
Federal	Surface Water	Federal Water Pollution Control Act--Water Quality Certification (CWA; 33 USC § 1341, Section 401) and Implementing Regulations	Yes	Section 401 of the CWA provides that applicants for a permit to conduct any activity involving potential discharges into waters or wetlands shall obtain certifications from the state stating that discharges will comply with applicable water quality standards. Any discharges to the City of Bellevue's stormwater conveyance system and/or surface water will be managed under the state program. In addition, ambient surface water quality criteria are considered screening criteria.
Federal	Air	Clean Air Act (42 USC § 7401 et seq.; 40 CFR Part 50)	Yes	The federal Clean Air Act creates a national framework designed to protect ambient air quality by limiting air emissions.

Table 3-2
Potential Regulations
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology



Authority	Resource	Implementing Laws/Regulations	Applicable	Applicability
Action-Specific (cont.)				
State	Air	Washington Clean Air Act and Implementing Regulations (Chapter 173-400-040[8] WAC)	Yes	These regulations require the owner or operator of a source of fugitive dust to take reasonable precautions to prevent fugitive dust from becoming airborne and to maintain and operate the source to minimize emissions. These regulations are applicable to all alternatives during construction.
Local	Air	Puget Sound Clean Air Agency	Yes	This requirement is similar to the Clean Air Act above but is more localized, addressing performance standards for land uses within King County. The Puget Sound Clean Air Agency regulations cover specific air quality issues within its regional jurisdiction. These air quality standards and pollution control regulations are applicable to remedial action alternatives involving construction.
Federal	Solid Waste	Transportation of Hazardous Materials (49 CFR Parts 105 to 177)	No	Transportation of hazardous waste or materials is required to meet state and federal requirements. These requirements are likely not applicable because soil will likely not be designated as hazardous waste.
Federal/State	Solid Waste	RCRA (42 USC § 6901 et seq.). Subtitle C-- Hazardous Waste Management (40 CFR Parts 260 to 279) Dangerous Waste Regulations (Chapter 173-303 WAC)	No	Subtitle C of RCRA pertains to the management of hazardous waste. These requirements are likely not applicable because soil will likely not be designated as hazardous waste. The soil at the site does not meet dangerous waste criteria.
Federal	Solid Waste	RCRA (42 USC § 6901 et seq.). Subtitle D-- Managing Municipal and Solid Waste (40 CFR Parts 257 to 258)	Yes	Subtitle D of RCRA establishes a framework for management of nonhazardous solid waste. These regulations establish guidelines and criteria from which states develop solid waste regulations. These requirements are applicable to the remediation alternatives that involve off-site disposal of impacted soil.

Table 3-2
Potential Regulations
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology



Authority	Resource	Implementing Laws/Regulations	Applicable	Applicability
Action-Specific (cont.)				
State	Solid Waste	Washington State Solid Waste Handling Standards (RCW 70.95; Chapter 173-350 WAC)	Yes	Washington State Solid Waste Handling Standards apply to facilities and activities that manage solid waste. The regulations set minimum functional performance standards for proper handling and disposal of solid waste; describe responsibilities of various entities; and stipulate requirements for solid-waste-handling facility location, design, construction, operation, and closure. These requirements are applicable to remediation alternatives that involve off-site disposal of impacted soil.
Federal/State	Solid Waste	Land Disposal Restrictions (40 CFR Part 268) (Chapter 173-303-140 WAC)	No	Best management practices for waste disposal are required to meet state and federal requirements. It is not anticipated that the remediation alternatives will generate waste that meets dangerous waste criteria as defined by WAC 173-303-140.
Federal/State	Remedy Construction	Federal Occupational Safety and Health Administration (29 CFR Parts 1904, 1910, and 1926) Washington Industrial Safety and Health Act (RCW 49.17; Chapter 296-24 WAC)	Yes	Site worker and visitor health and safety requirements established by the Washington Industrial Safety and Health Act are to be met during implementation of the remedial action.
State	Remedy Construction	UIC Program (Chapter 173-218 WAC)	Yes	UIC regulations apply to remedial action alternatives that include injection of biological or chemical oxidants into injection wells or trenches. These requirements are applicable for Alternatives 1 and 2.
State	Remedy Construction	Accreditation of Environmental Laboratories (RCW 43.21A.230 and WAC 173-50)	Yes	Required persons or organizations submitting analytical data under the purview of Ecology, Department of Health, and other entities, to use environmental laboratories which are accredited.
State	Remedy Construction	SEPA (RCW 43.21C; Chapter 197-11 WAC)	Yes	A SEPA review identifies and analyzes environmental impacts associated with the selected remedial action alternative. A SEPA review is required for local permitting and pursuant to MTCA.

Table 3-2
Potential Regulations
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology

Authority	Resource	Implementing Laws/Regulations	Applicable	Applicability
Action-Specific (cont.)				
State/Local	Remedy Construction	Washington Noise Control (RCW 70A.20; Chapter 173-60 WAC) City of Bellevue Noise Control Ordinance (City of Bellevue Code Chapter 9.18)	Yes	Potentially relevant, depending on construction activities and equipment selected. Construction activities will be limited to normal working hours, to the extent possible, to minimize noise impacts.
Local	Remedy Construction	Clearing and Grading Permit (City of Bellevue Code 23.76.035)	Yes	Projects that involve fill and/or excavation of more than 50 cubic yards (total of fill and excavation added together) require a Clearing and Grading Permit from the City of Bellevue.
State	Groundwater	Minimum Standards for Construction and Maintenance of Wells (RCW 18.104; Chapter 173-160 WAC)	Yes	Washington state has developed minimum standards for constructing water and monitoring wells, and for the decommissioning of wells. These regulations are applicable since there are existing monitoring wells at the Site.
Federal	Endangered Species, Critical Habitats	Migratory Bird Treaty Act (50 CFR Part 10.13)	Yes	The Migratory Bird Treaty Act makes it unlawful to kill migratory birds by any means unless permitted by regulations. Implementing the remedial action in conformance with MTCA will protect wildlife, including migratory birds. Any nesting habitat removed will be performed outside of nesting season. Consequently, no additional actions are needed to conform to the Migratory Bird Treaty Act.
Location-Specific				
Federal/State	Historic Areas	Archaeological and Historic Preservation Act (16 USC § 496.470 et seq.; 36 CFR Parts 65 and 800) Washington Archaeological Sites and Resources (RCW 27.44, 27.48, and 27.53; Chapter 25-48 WAC)	Yes	Actions must be taken to preserve and recover significant artifacts, preserve historic archaeological properties and resources, and minimize harm to national landmarks. There are no known historic or archaeological sites on the Property.

Table 3-2
Potential Regulations
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology

Authority	Resource	Implementing Laws/Regulations	Applicable	Applicability
Location-Specific (cont.)				
Federal	Endangered Species, Critical Habitats	ESA (16 USC § 1531-1544) and Implementing Regulations	No	The ESA protects species of fish, wildlife, and plants that are listed as threatened and/or endangered. It also protects designated critical habitat for listed species. This is not applicable based on a terrestrial ecological evaluation performed for the Property.
State	Aquatic Lands	Aquatic Lands Management--Washington State (RCW 79.90; Chapter 332-30 WAC)	No	The Aquatic Lands Management law develops criteria for managing state-owned aquatic lands. Aquatic lands are to be managed to promote uses and protect resources as specified in the regulations. The remediation alternatives are not on state-owned aquatic lands.
State	Public Lands	Public Lands Management (RCW 79.02)	No	Activities on public lands are restricted, regulated, or proscribed. The remediation alternatives do not occur on state-owned public land.
State	Shorelines and Surface Water	Shoreline Management Act of 1971 (RCW 90.58) and Implementing Regulations	No	Actions are prohibited within 200 feet of shorelines of statewide significance unless permitted. This is not applicable to the Property.
State	Wetlands	Shoreline Management Act of 1971 (RCW 90.58) and Implementing Regulations	No	It is required that construction or management of property in wetlands minimize potential harm, avoid adverse effects, and preserve and enhance wetlands. The remediation alternatives are not located in delineated wetlands.

Table 3-2
Potential Regulations
Tiki Car Wash, 11909 NE 8th Street, Bellevue, Washington
Washington State Department of Ecology



Authority	Resource	Implementing Laws/Regulations	Applicable	Applicability
Notes CFR = Code of Federal Regulations. CWA = Clean Water Act. ESA = Endangered Species Act. MTCA = Model Toxics Control Act. NPDES = National Pollutant Discharge Elimination System. RCRA = Resource Conservation and Recovery Act. RCW = Revised Code of Washington. UIC = underground injection control. USC = United States Code. WAC = Washington Administrative Code.				