



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
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April 30, 2013

Mr. Rob Roberts  
SoundEarth Strategies Inc.  
2811 Fairview Ave. East, Suite 200  
Seattle, Washington 98012

**Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site:**

- Name: Alaska Street Texaco
- Address: 3901 Southwest Alaska Street, Seattle, Washington
- Facility/Site No.: 39196282
- CSID: 6015
- VCP No.: NW2715

Dear: Mr. Roberts

Thank you for submitting documents regarding your proposed remedial action for the Alaska St Texaco (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Gasoline, oil, diesel range petroleum hydrocarbons (GRPH, ORPH, DRPH), benzene, toluene, ethyl benzene, xylene (BTEX), and polychlorinated biphenyl (PCB).

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does



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not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial action(s):

1. Draft Remedial Investigation and feasibility Study Report SKS Shell Property, 3901 Southwest Alaska Way, Seattle, Washington, Prepared by SoundEarth Strategies, Publication date April 24, 2013.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at 425.649.7235.

The Site is defined by the extent of contamination caused by the following release(s):

- Gasoline, oil, diesel range petroleum hydrocarbons (GRPH, ORPH, DRPH), and benzene, toluene, ethyl benzene, xylene(BTEX).

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site, Ecology has determined:**

- The vertical and lateral extent groundwater plume is not necessarily adequately characterized at the site. Additional groundwater wells will be necessary to describe the perimeter of the plume. Gasoline contaminated above MTCA cleanup levels in groundwater is observed in wells throughout the SKS Shell property. Groundwater flow is inferred to be north to northeast. Supplemental wells are required north of MW-3, northeast of MW-1 and east of MW-2. All three of the existing wells exceed MTCA cleanup levels. The suggested locations of the new wells are shown as triangles, provided in the attached figure. Additionally, gasoline contamination was also observed in groundwater well SMW04, west of the SKS Shell property. One or more additional wells are necessary too bound the gasoline plume to the west. Additional characterization wells can be installed concurrently with development of the draft cleanup action plan

(DCAP). Information developed from the supplemental wells may warrant a revision of the DCAP to account for change of the nature and extent of the plume.

- Provide groundwater flow direction for each of the most recent eight quarters. Use the three-point approach to develop the flow field and use multiple triangulated sections. Show the triangulated sections and flow direction for each.
- The selected remediation approach at this site includes excavation and removal of petroleum contaminated soil, dewatering of groundwater through operation of extraction wells along the east and north boundaries of the property, chemical oxidation, and monitoring. The groundwater dewatering approach involves installation of wells along the north and east right-of-way adjacent to the property. The suggested extraction rate from all wells is four gallons per minute (GPM). Capture analysis should be performed to determine the distance from the wells that plume capture will have an effect. Additionally, overlap of the cone-of-depression for each extraction well may increase drawdown and consequently result in reduced capture radius. Petroleum contamination will also exist within the SKS shell property. Determine whether the current system adequately reduces concentrations on property and how will this outcome be confirmed.
- The current dewatering approach recommends groundwater extraction for three to four months followed by monitoring. It is more appropriate to operate the system until contamination is reduced to a target level at all internal and perimeter points of compliance. The point of compliance for groundwater is "...throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected", WAC 173-340-720(8)(b).
- Soil removal will require confirmation sampling at sidewalls and bottom of excavated areas. The point-of-compliance for samples shall be established in soils throughout the site, WAC 173-340-740(6)(b). Confirmation samples must show contaminant levels that conform to MTCA cleanup levels selected for this site.
- Soil and groundwater cleanup levels at this site are to comply with MTCA Method A standards (WAC 173-340, Table 720-1 for groundwater and Table 740-1 for soil).

**This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action.** To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

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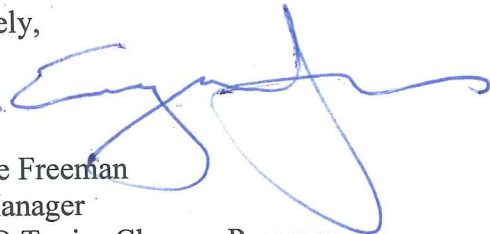
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 425-649-7191 or by email at [eufr461@ecy.wa.gov](mailto:eufr461@ecy.wa.gov).

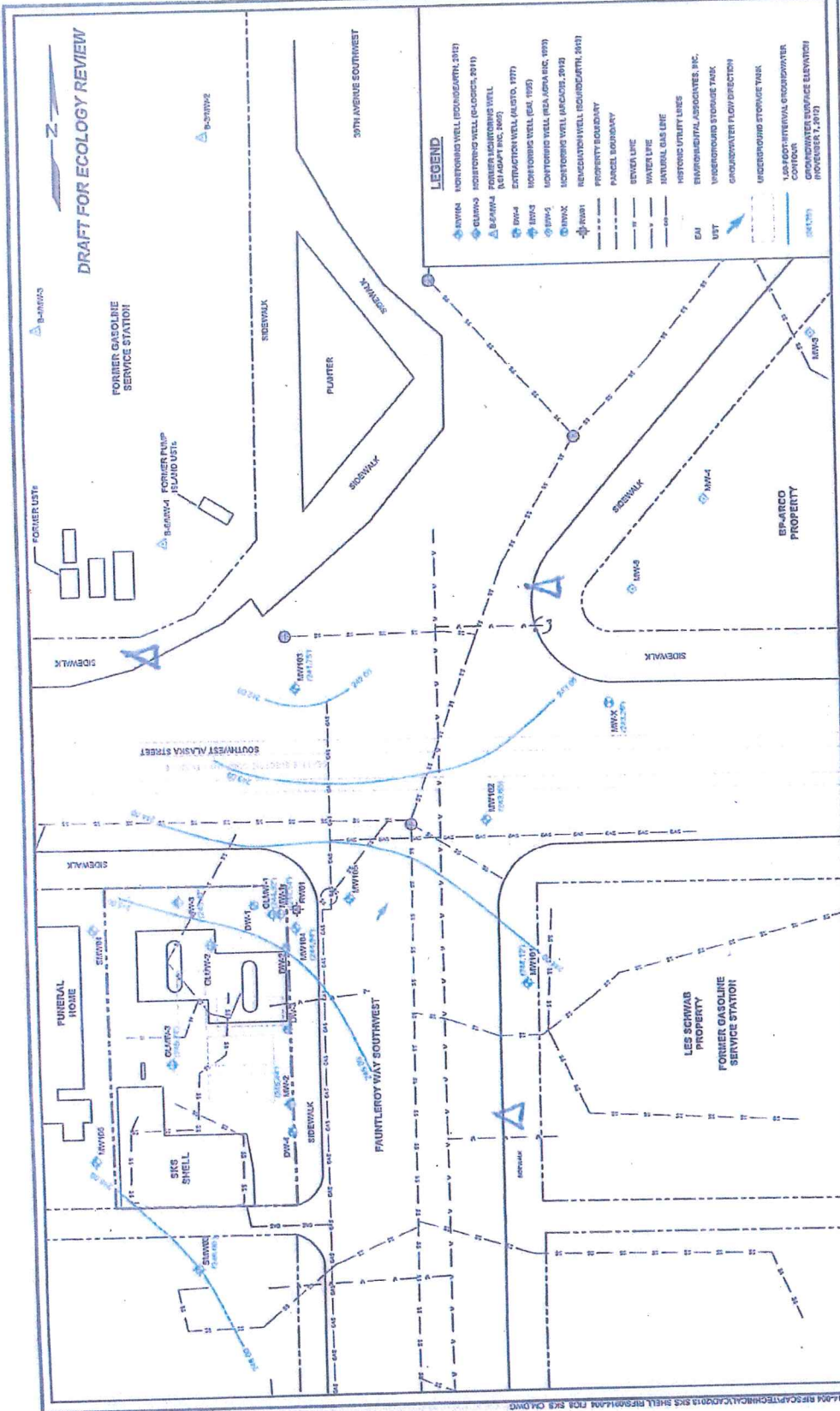
Sincerely,



Eugene Freeman  
Site Manager  
NWRO Toxics Cleanup Program

Enclosures: Site Map and Suggested Groundwater Monitoring Well Locations

**DRAFT FOR ECOLOGY REVIEW**



- LEGEND**
- ▲ MW104 MONITORING WELL (BORGSMITH, 2012)
  - ▲ MW103 MONITORING WELL (BORGSMITH, 2012)
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**FIGURE 8**  
SWS SHELL GROUNDWATER ELEVATIONS  
(NOVEMBER 7, 2012)



REGION: \_\_\_\_\_  
 PROJECT NAME: SWS SHELL PROPERTY  
 PROJECT NUMBER: 0914-004  
 STREET ADDRESS: 3891 SOUTHWEST ALASKA STREET  
 CITY, STATE: SEATTLE, WASHINGTON

DATE: 12/27/12  
 DRAWN BY: BLR/JOC/NIC  
 CHECKED BY: CER  
 CAD FILE: 0914-004\_FIG8\_SWS\_CH1



