



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 29, 2014

MR. JOE ZLAB
POTALA VILLAGE KIRKLAND, LLC
2804 GRAND AVENUE STE 308
EVERETT, WASHINGTON 98201-3586

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

- **Name:** Potala Village
- **Address:** 21 10th Avenue South, 1006 Lake Street South and 6700 Lake Washington Blvd NE, Kirkland, Washington
- **Facility/Site No.:** 4595
- **VCP Project No.:** NW2850
- **Cleanup Site ID No.:** 12329

Dear Mr. Zlab:

Thank you for submitting documents regarding your proposed remedial action for the **Potala Village** facility (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 releases at the Site:

- Total petroleum hydrocarbons in the gasoline- (TPH-G), diesel- (TPH-D), and heavy oil- (TPH-O) ranges, benzene, toluene, ethylbenzene and xylenes (BTEX), tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE) and Chromium III into the Soil

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 letter satisfies a request for an opinion on documents submitted with a VCP application in April 2014 as well as a request for an opinion on a Cleanup Action Report dated May 16, 2014.



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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 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 actions:

1. Earth Solutions NW LLC, 2014. *Cleanup Action Report, Potala Village Property, 21 10th Avenue South, 1006 Lake Street South and 6700 Lake Washington Blvd., Kirkland, Washington.* May 16.
2. Environmental Partners, Inc., 2014. *Underground Storage Tank Closure and Remedial Action Report, Potala Village Kirkland, 21 Tenth Avenue South, 6700 Lake Washington Boulevard, Kirkland, Washington.* May 16.
3. Earth Solutions NW LLC, 2013. *Geotechnical Engineering Study, Proposed Potala Village Property, 21 10th Avenue South, 1006 Lake Street South and 6700 Lake Washington Blvd., Kirkland, Washington.* May 16.
4. Environmental Partners, Inc., 2014. *Request for "Contained In Determination", Former Michael's Fine Dry Cleaning, 1006 South Lake Street, Kirkland, Washington.* March 28.
5. Earth Solutions NW LLC, 2013. *Cleanup Action Plan, Proposed Potala Village, 21 10th Avenue South, 1006 Lake Street South and 6700 Lake Washington Blvd., Kirkland, Washington.* September 19.
6. GeoEngineers, 2010. *Geotechnical Engineering Services, Potala Village Kirkland, Kirkland, Washington.* December 1.
7. Aspect Consulting, 2010. *Phase I Environmental Site Assessment, Potala Village: 1006 Lake Street South, 21 Tenth Avenue South and 6700 Lake Washington Boulevard, Kirkland, Washington.* October 15.
8. Aspect Consulting, 2008. *Additional Soil and Groundwater Sampling Results, 1006 Lake Street, Kirkland, Washington.* April 25.
9. Aspect Consulting, 2008. *Soil and Groundwater Sampling Results, 1006 Lake Street, Kirkland, Washington.* February 27.

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10. Environmental Associates, Inc., 2006. *Preliminary Subsurface Sampling & Testing, Dry Cleaning Facility, 1006 Lake Street South, Kirkland, Washington 98033*. August 8.

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 or sending an email to: nwro_public_request@ecy.wa.gov.

The Site is defined by the extent of contamination caused by the following releases:

- TPH-G, TPH-D, TPH-O, BTEX, PCE, TCE, cis-1,2-DCE and Chromium III into the Soil

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.

The Site is associated with three tax parcels that comprise the Property which are labeled herein with capital letters A, B and C for discussion (see the table in the Site Description in Enclosure A for further explanation).

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 previously stated releases at the Site, Ecology has determined:**

- Two underground storage tanks (UST) that contained heating oil and one that contained waste oil were decommissioned and removed from the Property in April 2014. The work was supervised by a Washington UST Site Assessor registered with Ecology and performed in accordance with WAC 173-360.
- Soil contaminated with petroleum hydrocarbons and VOCs exceeding MTCA Method A cleanup levels has been removed from the Property. You have proposed MTCA Method A cleanup levels for the Site. Based on currently known Site conditions, MTCA Method A soil and ground water cleanup levels will most likely be applicable.
- The Site and surrounding area provide limited terrestrial ecological habitat as the land surface is primarily covered by buildings, landscaped grounds, streets and other areas paved with concrete and asphalt. Thus, the Site appears to qualify for an exclusion from a terrestrial ecological evaluation (WAC 173-340-7491(1)(c)(i)); there are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of any part of the Site.

- A former dry cleaner on Parcel A was investigated in 2006 with four soil borings and in 2008 with five soil borings. None of 15 soil samples collected in the nine borings was found to contain any detectable constituents of dry cleaning solvents or related by-products. One of two ground water samples collected from the borings in a discontinuous perched zone contained PCE at a concentration of 10 µg/L which exceeded the MTCA Method A cleanup level (5 µg/L). The sample also contained TCE and cis-1,2-DCE at concentrations below their respective Method A cleanup levels. These detections in ground water indicated that a release of dry cleaning solvent occurred and impacted perched ground water and also that microbial degradation of PCE was occurring. However, the lack of detections in soil suggests that the PCE release was limited in extent. The area containing the former dry cleaning operation was excavated in April 2014 to a maximum depth of 3 feet below the ground surface (bgs). Soil containing PCE, TCE and cis-1,2-DCE was detected at concentrations exceeding MTCA Method A cleanup levels. Confirmation soil samples collected in the sidewalls and bottoms of the excavation indicate that any impacted soil exceeding MTCA Method A cleanup levels associated with the former dry cleaner has been removed from the Site. No ground water was encountered in the excavation however perched water was previously encountered in soil borings at 3.5 and 4 feet bgs and the depth of the excavation was 3 feet bgs. However, based on the 2006 and 2008 soil borings, it is unlikely that perched water, if encountered, exists as a continuous water bearing zone. Deeper ground water in a monitoring well on Parcel A (MW-3) and immediately west and downgradient of Parcel A (MW-1 and MW-2) did not show impacts from the dry cleaning solvent release when sampled in 2008 and in 2014 (only MW-1 and MW-2 sampled).
- In Parcel B, an area containing soil contaminated with petroleum hydrocarbons was identified and excavated in April and May 2014. Soil in this area was found to contain TPH-G up to 4,600 mg/kg and TPH-O up to 2,500 mg/kg, both exceeding the respective Method A cleanup levels. The area contained the former ARCO gasoline USTs, related piping and the fuel dispensers but these features were found to have been removed at an earlier time. The dimensions of the final excavation were approximately 80 feet by 54 feet and ranged in depth from three to 12 feet bgs. A 185-gallon waste oil UST was encountered in the excavation, decommissioned and removed from the Site. Petroleum-contaminated soil was removed from the excavation until visual and olfactory evidence as well as photoionic detector readings provided field screening data suggesting that the contamination had been removed. For verification, confirmation soil samples were collected in excavation and sidewalls and analyzed for TPH-G, TPH-D, TPH-O, volatile organic compounds and MTCA 5 metals. The analytical results indicated that none of the confirmation samples contained TPH, VOCs or metals at concentrations above Method A cleanup levels. The confirmation soil samples were found to contain total chromium at concentrations ranging from 21 to 75 mg/kg. Two samples containing 63 and 64 mg/kg total chromium contained non-detectable levels of chromium VI so the total chromium detected is assumed to be chromium III. None of the detected chromium

III concentrations exceed the Method A cleanup level. Additionally, two soil samples with the highest concentrations of TPH-O were analyzed for carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and polychlorinated biphenyls (PCBs). PCBs were not detected in either of the samples; cPAHs were not detected above the Method A cleanup level.

- The Site extends off the Property on Parcel B and onto a City of Kirkland (City) right-of-way. Soil contaminated with TPH-G at concentrations ranging from 280 to 1,800 mg/kg which exceed the MTCA Method A cleanup level (30 mg/kg) remains along an approximate 40-foot long section of the southwest boundary of Parcel B at depths of approximately four to six feet below the ground surface/sidewalk. The depth and extent of this off-Property contamination indicates it potentially migrated within backfill materials associated with an underground utility corridor in the City's right-of-way. The contamination most likely extends under the sidewalk however the lateral and vertical extent of the contamination is unknown.
- Parcel C is the location of a former residence built in 1953 where two nested heating oil USTs and related piping were removed in 2014. Soil contaminated with TPH-D up to 9,000 mg/kg was encountered below the tanks indicating a release had occurred. No TPH-O was detected. The UST basin was overexcavated to a depth of 7.5 feet in an area with dimensions 15 feet wide by 30 feet long. A total of 167 tons of petroleum-contaminated soil was removed and disposed of off-Property. Twenty confirmation soil samples collected in the excavation sidewalls and bottom contained non-detectable concentrations of TPH-D and TPH-O. One confirmation sample analyzed for carcinogenic polyaromatic hydrocarbons (cPAH) contained non-detectable levels.
- Soil at the Property boundary containing TPH-G up to at least 1,800 mg/kg may pose a vapor intrusion threat to the planned building. At a minimum, a Tier 1 evaluation should be performed in accordance with Ecology's *Draft Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action* dated October 2009.
- Shallow ground water has been encountered in isolated areas on the Property as a discontinuous perched layer above dense Vashon till. At lower elevations on Parcels A and B, a non-continuous perched layer was encountered in fill materials overlying the till. At higher elevations on eastern portions of Parcels B and C, a discontinuous perched layer was encountered in several locations in recessional outwash deposits. These occurrences do not constitute a continuous water-bearing zone. However, a deep water bearing zone occurs on the Property and is transmitted within sandy interstitial layers in a silt formation that occurs below the Vashon till. The deep water bearing zone has been investigated on Parcel A. No evidence exists of impacts to the deep water bearing zone from the former dry cleaning operation.

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- Further Site characterization should include monitoring of ground water downgradient (west) of the southwest Property boundary. Potential impacts of the off-Property TPH-G MTCA exceedences in soil should be evaluated for the soil leaching to ground water pathway.
- During redevelopment, the Property will be further excavated to an approximate maximum depth of 30 feet bgs. Although known contamination in soil has been removed, the excavation should be monitored for the potential presence of additional, unknown sources of contamination. If additional soil contamination is encountered, it should be removed and verified with confirmational sampling and documented in a report.
- Monitoring well MW-3 needs to be decommissioned in accordance with WAC 173-160 and a copy of the well decommissioning log sent to Ecology.

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.**

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.

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If you have any questions regarding this opinion, please contact me at (425) 649-7064 or
hvic461@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Vick". The signature is written in a cursive style with a small mark above the 'i'.

Heather Vick, LHg
NWRO Toxics Cleanup Program

Enclosures: (1) A Site Description and Diagrams

cc: Angela Ruggeri, City of Kirkland
 Sonia Fernandez, VCP Coordinator, Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

This section provides Ecology's understanding and interpretation of Site conditions, and is the basis for the opinions expressed in the body of the letter.

Site: The Site is defined as total petroleum hydrocarbons in the gasoline- (TPH-G), diesel- (TPH-D) and oil- (TPH-O) ranges, benzene, toluene, ethylbenzene and xylenes (BTEX), tetrachloroethene (PCE) and related degradation compounds including trichloroethene (TCE) and dichloroethene (cis-1,2-DCE) and chromium III in soil. The Site contamination resulted from underground storage tanks (USTs), fuel pumps, fuel lines and hydraulic hoists related to a former gasoline station located at 6700 Lake Washington Blvd NE, two residential home heating oil USTs formerly located at 21 10th Avenue South and a former dry cleaning operation formerly located at 1006 Lake Avenue South in Kirkland, Washington. The three addresses listed above correspond to three King County tax parcels which comprise the Property. Based on TPH-G in soil at concentrations exceeding the MTCA Method A cleanup level, the Site extends off-Property to the west onto a City of Kirkland (City) right-of-way.

Area and Property Description: The Property comprises 1.21 acres of land located in the Feriton neighborhood south of downtown Kirkland. The Property area is densely developed with primarily residential and some commercial land uses. The Property is bordered to the north by 10th Avenue South and residential properties. The Property is bordered to the east by a private residence and Park Bay Condominiums. The Property is bordered to the south by Pleasant Bay Condominiums. The Property is bordered to the west by Lake Washington Boulevard NE, condominiums and residential properties. The Property is sloped to the west and ranges in elevation from approximately 32 to 57 feet above mean sea level.

Property History and Current Use: The history of the Property is summarized in the table below. Each of the three parcels is labeled with a letter as shown in the first column. A 1936 aerial photograph (King County IMAP) shows the Property as undeveloped land. The Property was surrounded by rural residential and agricultural land uses to the north, east and south. A bulk fuel plant was located directly west of the Property across Lake Street.

Parcel Number (Label)	Street Address	Former Land Use	Contaminant Source; Confirmed Contamination	Parcel Size
9354900220 (Parcel A)	1006 Lake Street S	OK Tire Store (1958 – mid 1970s); Michael's Fine Dry Cleaning and Asian Kitchen (at least 1990s – redevelopment)	Dry cleaner; PCE and related byproducts in soil and perched ground water	0.24 acre
0825059233 (Parcel B)	6700 Lake Washington Blvd NE	Gas station (1957 – 1973); parking lot until redevelopment	Two former gasoline USTs; waste oil UST; gasoline and oil in soil	0.75 acre
9354900240 (Parcel C)	21 10 th Avenue S	Single-family residence (1953 – redevelopment)	Two heating oil USTs; diesel in soil	0.22 acre

A building was constructed on Parcel A in 1958 to house the OK Tire Store, which provided new tires, recapping, wheel alignment and batteries and was in operation from 1958 to the mid-1970s. At a later time, a restaurant and dry cleaners were located on Parcel A from at least the mid-1990s to 2013 when redevelopment of the Property was initiated.

Parcel B is the former location of an ARCO gasoline service station that was built in 1957 and was equipped with two 4,000-gallon USTs and one 275-gallon waste oil UST. The service station was demolished in 1973 and the two gasoline USTs, piping and fuel pumps were reportedly removed at that time. A waste oil UST was reportedly left on the Site.

Parcel C was formerly the location of a 2,350-square foot private residence built in 1953. Two heating oil USTs were located on Parcel C. The building was demolished in early 2014 as part of redevelopment of the Property. The two USTs and soil contaminated with TPH-D were removed in April 2014.

The Property is currently undergoing redevelopment as Potala Village, a proposed five-story, mixed-use building with 143 apartments, 6,000 square feet of retail space and 2 floors of underground parking.

Sources of Contamination: Each of the three parcels comprising the Property is associated with a separate contaminant source. A 2010 Phase I Environmental Site Assessment conducted on the Property identified the former dry cleaners, former gasoline service station and a suspected residential heating oil UST as recognized environmental conditions. Parcel A was the location of Michael's Fine Dry Cleaning, a dry cleaner operation using PCE-based solvents in operation from at least the 1990s to the time of redevelopment. Parcel B was the location of a gasoline station from 1957 to the early 1970s which had gasoline and waste oil USTs, related piping, fuel pumps and hydraulic hoists. Parcel C was the location of a private residence which had two heating oil USTs that released fuel into the underlying soil.

Physiographic Setting: The Site is located within the Puget Sound Lowland Physiographic Province, a north-south trending structural and topographic depression bordered on the west by the Olympic Mountains, and to the east by the Cascade Mountain foothills. The Puget Sound Lowland is underlain by Tertiary volcanic and sedimentary bedrock, and has been filled to the present day land surface with Pleistocene glacial and nonglacial sediments. The Site is located in the Interlake Drift Upland subphysiographic province.

Surface/Storm Water System: The Property is located approximately 250 feet east of Lake Washington. Stormwater runoff on and in the vicinity of the Property disperses via sheet flow to catch basins connected to the City of Kirkland stormwater system which is then routed to Lake Washington.

Ecological Setting: The Property is located in an area that has been heavily developed with primarily residential and some commercial land uses. The land surface is covered by buildings and landscaped yards with asphalt and concrete streets and parking areas. A 4.18-acre shoreline park, Marsh Park, is located on Lake Washington approximately 150 feet southeast of the Property and contains minimal undeveloped land.

Geology: Native geologic materials at the Site are primarily composed of dense glacial till overlying glacially overridden silt to the maximum depth explored on the Property which was 55 feet bgs. In three monitoring well borings drilled on Parcel A in 2008, 19 feet of dense silty sand occurred above hard, slightly sandy silt to a depth of 30 feet when a transition to a silt unit was encountered. The silt extended to 45 feet bgs in the boring drilled for MW-1.

Ground Water: Based on investigations conducted at the Site, shallow ground water occurs as a discontinuous perched zone within fill materials (and recessional outwash in eastern part of the Property) above the Vashon till. Ground water also occurs within the more permeable, sandy zones within the silt unit as evidenced by water columns in monitoring wells MW-1 through MW-3 and seepages noted in the 2013 geotechnical borings. Water levels in the three monitoring wells eventually equilibrated to depths of 0.1 to 1.7 feet bgs. Based on one round of ground water elevation data collected in 2008, ground water on the Site flows to the west-northwest. The 2008 water levels also suggest that ground water seepage zones in the silt intersecting the screened intervals of the wells most likely occur under semi-confined or confined conditions due to the low hydraulic conductivities of the silt unit and the overlying till. If so, these materials would also presumably act as a barrier to vertical contaminant migration.

A 2010 geotechnical study encountered isolated perched ground water in Parcel B in recessional outwash deposits that occurred above the Vashon till. A 2013 geotechnical study on the Site advanced two soil borings (B1 and B2) along the eastern boundary of the Property to a total depth of 51.5 feet bgs. Ground water seepage was encountered at varying depths in the two borings between approximately 4 and 51.5 feet bgs.

A test pit (TP-101) was excavated on May 7, 2014 to investigate the presence of ground water on the Property. The test pit was dug to a depth of 22 feet bgs and encountered very dense glacial till to a depth of about 15 feet which was underlain by dense silt. No ground water seepage was observed in the 30 minutes the pit was left open but this amount of time may not have been sufficient to allow ground water in the sand lenses in the silt, if intersected, to flow into the excavation.

Water Supply: Kirkland's water supply is obtained primarily from the South Fork Tolt River Watershed. On rare occasions, the Tolt River water is supplemented with water from the Cedar River watershed. According to Ecology's well log database, no water supply wells are located within 0.5 mile of the Site.

Release and Extent of Soil and Ground Water Contamination:

In July 2006, four direct push borings were advanced on Parcel A to depths ranging from 3.5 to 11 feet bgs. Two of the borings (B-1 and B-2) were completed outside of the former dry cleaning facility to the west and south of the dry cleaners. The other two borings (B-3 and B-4) were completed inside the dry cleaning facility. Soil samples collected from each of the borings contained non-detectable concentrations of volatile organic compounds (VOCs). One boring (B-4) encountered perched ground water at approximately 4 feet bgs. A sample from B-4 contained PCE at 10 µg/L and DCE at 5.5 µg/L exceeding MTCA Method A cleanup levels. TCE and cis-1,2-DCE were also detected in the B-4 ground water sample at concentrations below Method A cleanup levels. These results indicated that a release of dry cleaning solvent had occurred.

In 2008, five additional soil borings (B-5 through B-9) were drilled to depths ranging from 4.5 to 8 feet bgs. Shallow ground water was encountered at 3.5 feet bgs in one of the borings, B-5, which was located adjacent to the sanitary sewer line at the Property. Soil samples collected from the five borings and a ground water sample from boring B-5 contained non-detectable levels of VOCs. Based on the results, the extent of chlorinated solvents on Parcel A appeared to be limited to the area near the former dry cleaning machine.

Ground water was encountered at depths of 3.5 to 4 feet bgs in two of nine borings advanced on Parcel A suggesting the occurrence of a non-continuous, perched water bearing zone.

In January 2008, three monitoring wells (MW-1 through MW-3) were installed on Parcel A. No soil samples from the monitoring well borings were submitted for laboratory analysis. One well (MW-1) was screened from 25 to 45 feet bgs; two wells (MW-2 and MW-3) were screened from 10 to 30 feet bgs. The wells were slow to recharge after installation which was attributed to the low hydraulic conductivity of the materials screened. Ground water samples collected from the three wells in March 2008 contained no detectable VOCs. Ground water samples collected from two of the wells (MW-1 and MW-2) in 2014 contained no detectable VOCs. Monitoring well MW-3 was reportedly damaged during remediation activities. It is unknown if MW-3 has been properly decommissioned in accordance with WAC 173-160.

In 2013 and 2014, the Property was remediated as follows:

Parcel A. In December 2013 and March 2014, a test pit (No. 8) measuring 18 feet by 34 feet was excavated in the area of the former dry cleaner building. A total of ten soil samples were collected from the bottom of test pit No. 8 at depths of 1 and 3 feet bgs. Five of the ten soil samples contained detectable PCE, TCE, DCE or acetone. One sample, TP8@E at a depth of 1 foot bgs on the east side of the excavation contained PCE at a concentration exceeding the Method A cleanup level of 0.05 mg/kg. The sample also contained TCE and cis-1,2-DCE at concentrations below their respective Method A cleanup levels. The footprint was later overexcavated 2 feet wider to the north

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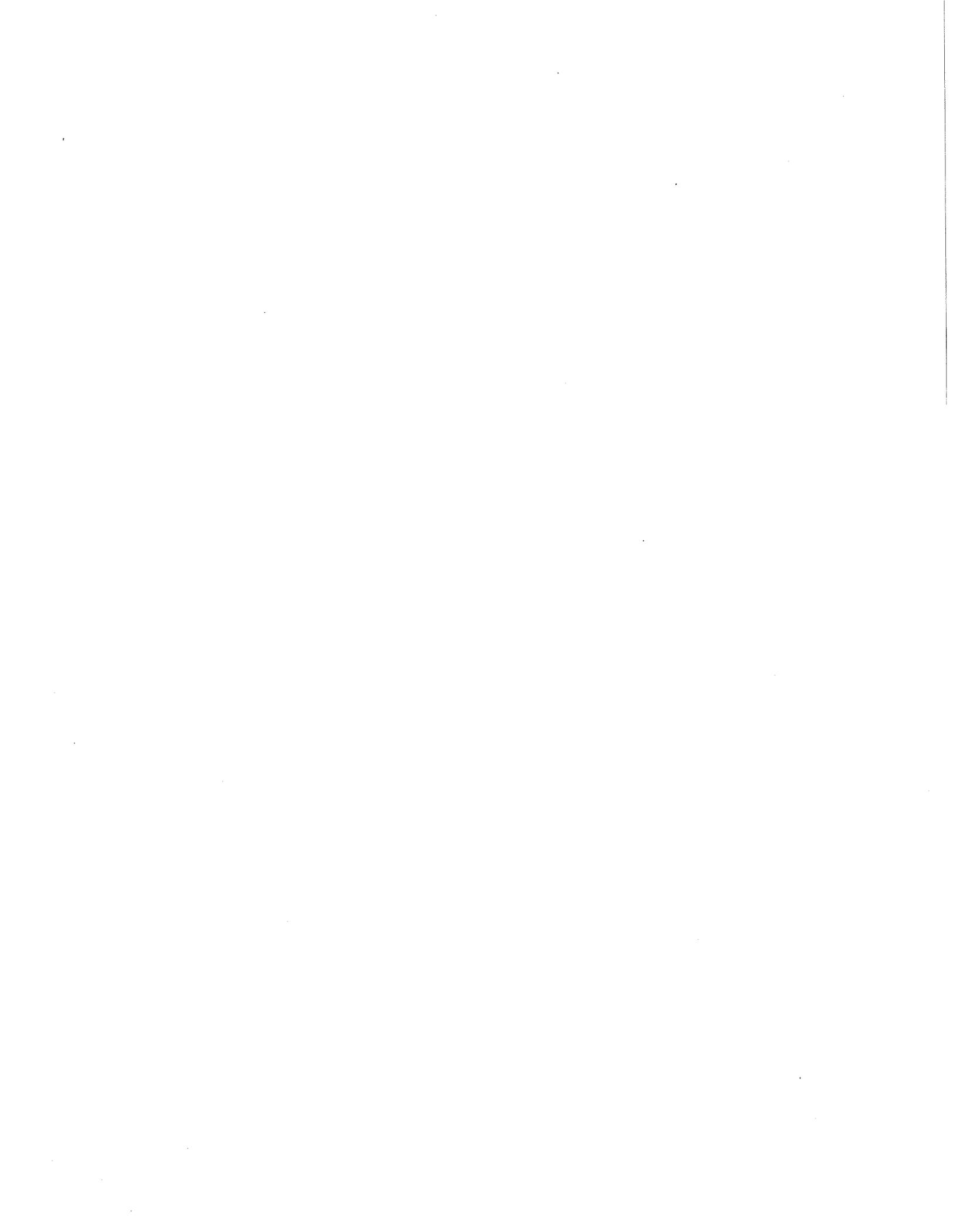
and to a total depth of 3 feet with sidewall and bottom samples confirming soil containing VOCs at concentrations exceeding Method A cleanup levels had been removed. A total of approximately 140 tons of soil contaminated containing PCE and related chlorinated compounds were removed from the Site.

Parcel B. In December 2013 and March 2014, a 185-gallon waste oil tank was removed from the central portion of Parcel B. In addition, approximately 3,216 tons of petroleum-contaminated soil were removed and transported off-Property for treatment and disposal. The excavation was confirmed with soil samples collected on the sidewalls and bottom that contained TPH-G, TPH-D, TPH-O, VOCs and MTCA 5 metals at concentrations below MTCA Method A cleanup levels. Even though the gas station operated at a time when tetraethyl lead was added to gasoline to prevent engine knock, no lead was detected in any of the confirmation soil samples collected in Parcel B.

Parcel C. Two nested heating oil USTs (265-gallon and 330-gallon) were removed from Parcel C in April 2014. Soil contaminated with TPH-D exceeding MTCA Method A cleanup levels was detected underlying the two USTs. The soil was excavated to a depth of 7.5 feet. Confirmation soil samples verified that soil exceeding Method A cleanup levels were removed from the Property.

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Site Diagrams



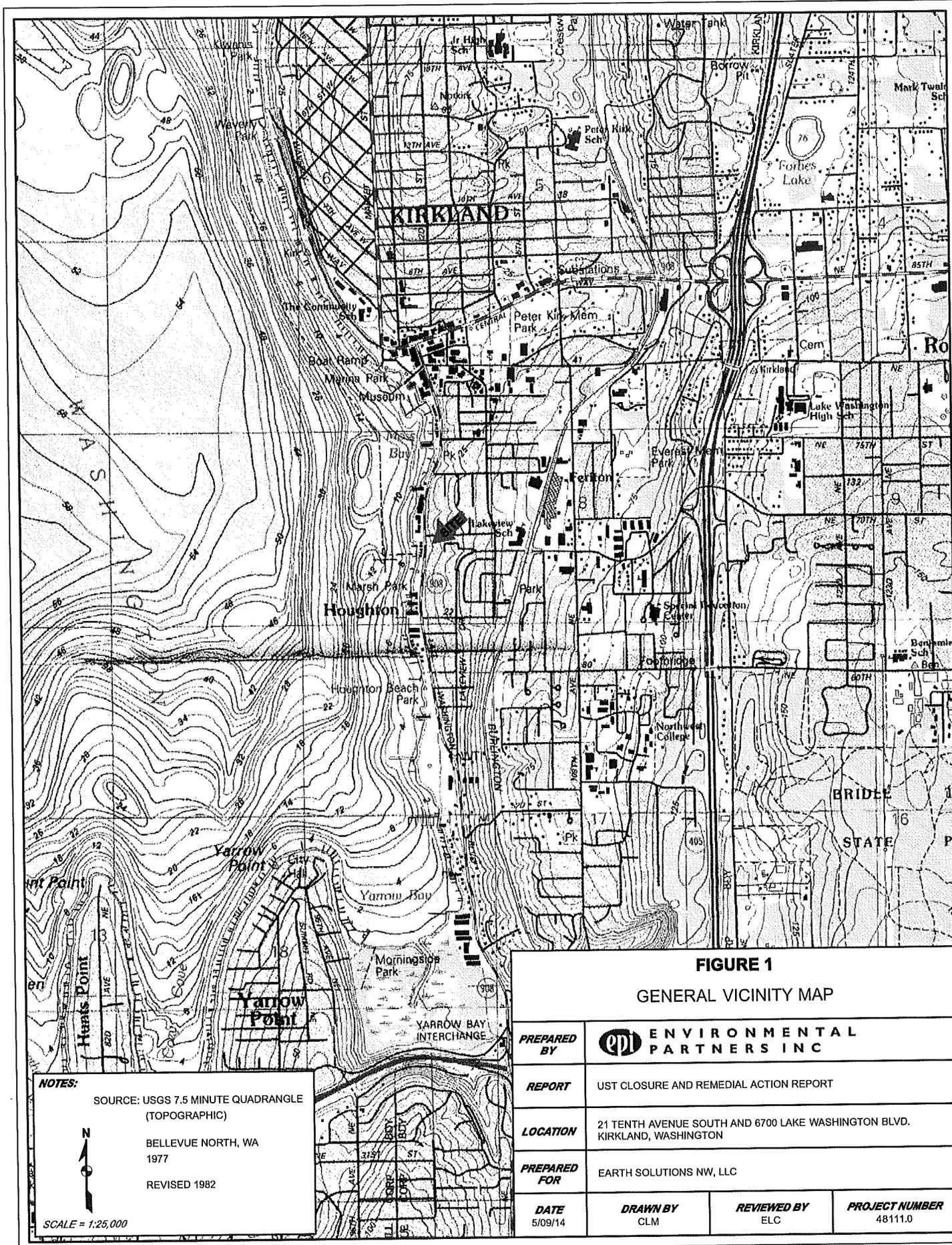


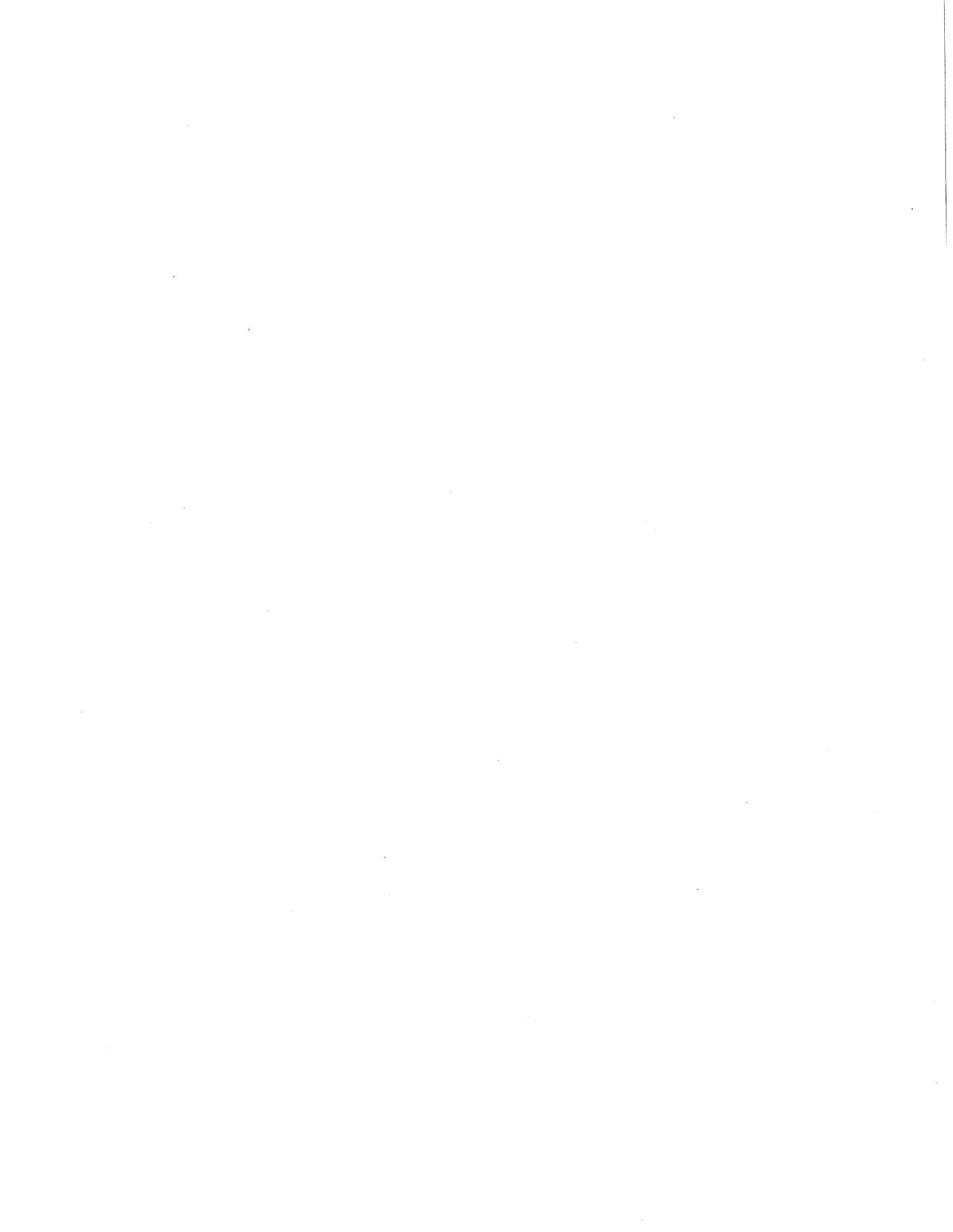
FIGURE 1

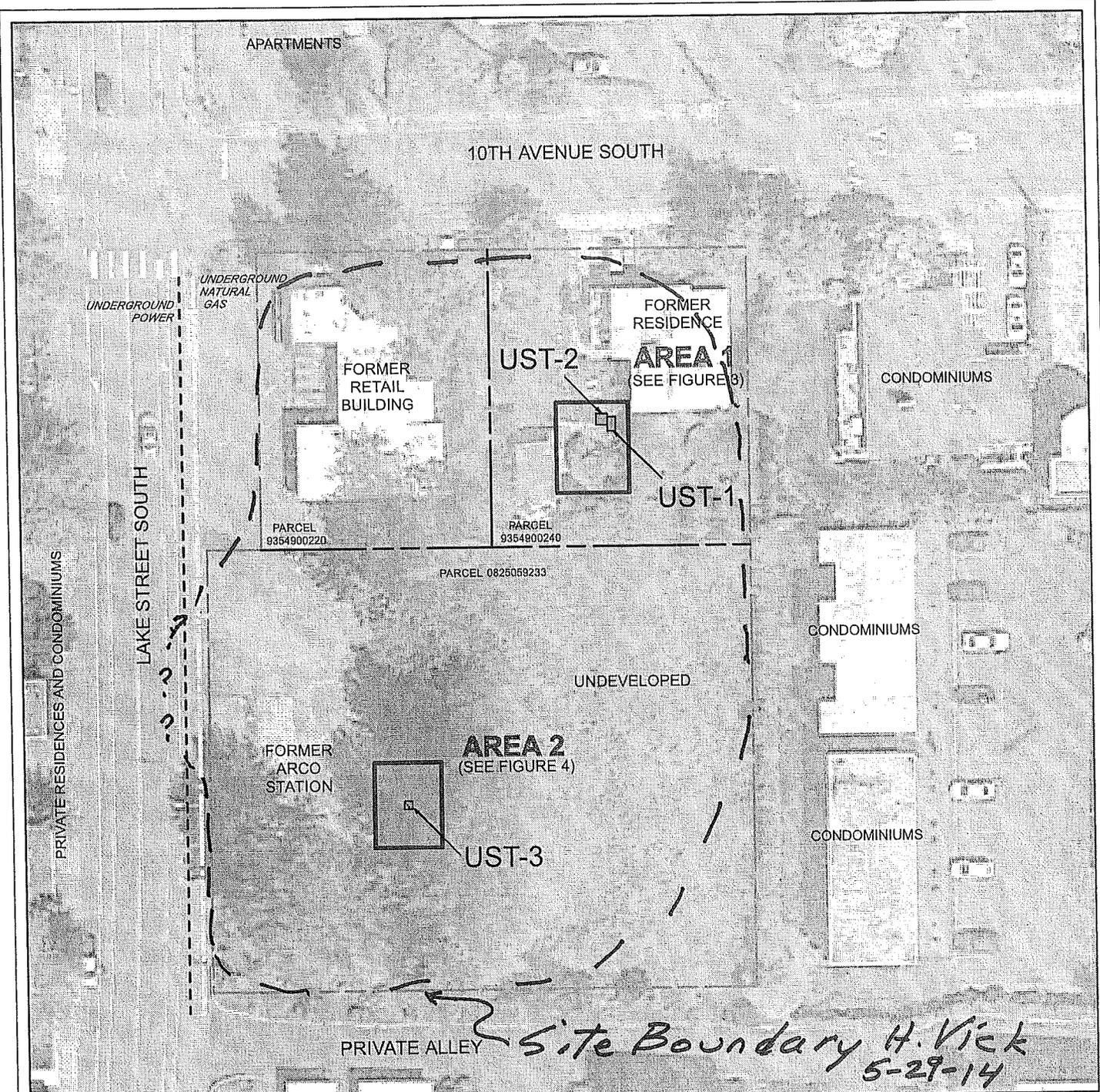
GENERAL VICINITY MAP

NOTES:
 SOURCE: USGS 7.5 MINUTE QUADRANGLE (TOPOGRAPHIC)
 BELLEVUE NORTH, WA
 1977
 REVISED 1982

SCALE = 1:25,000

PREPARED BY	 ENVIRONMENTAL PARTNERS INC		
REPORT	UST CLOSURE AND REMEDIAL ACTION REPORT		
LOCATION	21 TENTH AVENUE SOUTH AND 6700 LAKE WASHINGTON BLVD. KIRKLAND, WASHINGTON		
PREPARED FOR	EARTH SOLUTIONS NW, LLC		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
5/09/14	CLM	ELC	48111.0





NOTES:

AERIAL SOURCE: GOOGLE EARTH
 FLIGHT DATE: MAY 4, 2013

--- APPROXIMATE PROPERTY BOUNDARY

--- APPROXIMATE PARCEL BOUNDARY

N

0 15 30 60

SCALE: 1" = 60'

FIGURE 2			
SITE REPRESENTATION			
PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	UST CLOSURE AND REMEDIAL ACTION REPORT		
LOCATION	21 TENTH AVENUE SOUTH AND 6700 LAKE WASHINGTON BLVD. KIRKLAND, WASHINGTON		
PREPARED FOR	EARTH SOLUTIONS NW, LLC		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
5/16/14	CLM	ELC	48111.0

