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July 21, 2014

Ms. Maureen Sanchez, Site Manager
Washington State Department of Ecology, Voluntary Cleanup Program
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008

BY E-MAIL AND MAIL

**RE: SCOPE OF WORK
LIMITED SOIL INVESTIGATION
ENDOLYNE GARDEN APARTMENTS
9212 45th AVENUE SOUTHWEST, SEATTLE, WASHINGTON
FARALLON PN: 1295-001**

Dear Ms. Sanchez:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter on behalf of Endolyne Apartments, LLC (Endolyne) to provide the Washington State Department of Ecology (Ecology) a scope of work to conduct a limited soil investigation of potential releases from underground storage tanks (USTs) at 9212 45th Avenue Southwest in Seattle, Washington (herein referred to as the Site). The 0.22-acre Site reportedly was used as a gas station and automotive repair shop from prior to 1940 until 1989, when it was redeveloped as a 14-unit apartment complex with a restaurant on the ground floor. Redevelopment included decommissioning six USTs that reportedly were used to store oil and gasoline. The scope of the limited soil investigation is designed to meet the requirements of the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340).

The scope of the limited soil investigation was developed based on conversations with Endolyne in May 2014, including a meeting at the Site on May 28, 2014, and the following documents provided by Endolyne:

- Letter regarding Removal of Underground Storage Tanks, 14-Unit Apartment Building, 9212 45th Avenue S.W., Permit No. 645073, Seattle, Washington dated September 5, 1989 from Mr. Marc McGinnis, Geotech Consultants, to Ms. Faith Lumsden, City of Seattle Department of Construction and Land Use (UST Removal Report);
- Letter regarding Closure Report, Underground Storage Tanks, 14-Unit Apartment Building, 9212 45th Avenue, Seattle, Washington dated December 5, 1989 from Mr. Marc McGinnis and Mr. Don Spencer, Geotech Consultants, to Fauntleroy Associates (UST Closure Report);



- Phase I Environmental Site Assessment, Endolyne Garden, 9212 and 9214 45th Avenue Southwest, King County Parcel No. 234670-0000, Seattle, King County, Washington dated December 9, 2013, prepared by Terracon Consultants, Inc. for Intervest (Phase I Report); and
- Letter regarding Opinion Pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the Following Hazardous Waste Site: 45th Avenue SW Apartments, 9212 45th Avenue SW, Seattle, WA, Facility/Site No.: 71883959, VCP No.: NW2809, Cleanup Site ID No.: 10264 dated March 11, 2014 from Ms. Maureen Sanchez, Toxics Cleanup Program, Ecology, to Mr. Kurt Fisher, Endolyne Gardens, LLC (Opinion Letter).

According to information available from the Ecology Toxics Cleanup Program website, a release of petroleum products was reported to Ecology on September 5, 1989. Cleanup of affected soil occurred under Ecology oversight or review. It appears that on June 1, 1995, after the Site had been redeveloped, the Site was removed from the Ecology Leaking Underground Storage Tank (LUST) database, presumably based on the cleanup work conducted during Site redevelopment, as documented in the UST Closure Report. Apparently the Site was re-listed in the LUST database on July 1, 2011, and Ecology completed an "Initial Investigation/Federal Preliminary Assessment" on August 8, 2011. The Site was entered into the Ecology Voluntary Cleanup Program (VCP) on December 23, 2013, and Ecology issued the Opinion Letter on March 11, 2014. The following Ecology site identification numbers are provided for reference:

Facility/Site: 71883959
Cleanup Site: 10264
Voluntary Cleanup Program: NW2809

The purpose of the limited soil investigation is to address Ecology concerns identified in the Opinion Letter, obtain shallow soil data from the Site that are representative of current Site conditions sufficient to ensure the Site does not present a threat to human health and the environment, and to obtain an unconditional No Further Action (NFA) determination for the Site. The results of the limited soil investigation and any subsequent subsurface investigation and/or cleanup action, if necessary, will be submitted to Ecology under the VCP.

BACKGROUND

The UST Closure Report summarizes work conducted during UST decommissioning in 1989, including soil sampling, laboratory analyses of soil samples and analytical results, observations of Site conditions and the USTs during decommissioning, and remedial measures undertaken for soil. The UST Closure Report concluded that concentrations of petroleum hydrocarbons, benzene, toluene, ethylbenzene, and xylenes (BTEX) in soil remaining proximate to the former USTs were less than Ecology "guidelines for UST removal," no further characterization of the UST areas was required, and the USTs had been properly closed in conformance with the "intent and purpose of federal and state regulation guidelines."

According to the Opinion Letter, Ecology requires current Site data to evaluate Site conditions and determine the adequacy of the 1989 cleanup actions. Farallon has proposed an initial limited



soil investigation to include collection of soil samples from areas of the former USTs for laboratory analysis for petroleum hydrocarbons and constituents in accordance with MTCA and Ecology guidance¹.

If concentrations of petroleum hydrocarbons and constituents in soil samples collected proximate to the former USTs exceed MTCA cleanup levels, further work may be required to address other Ecology concerns identified in the Opinion Letter and to satisfy MTCA requirements for a remedial investigation/feasibility study and cleanup remedy selection and implementation that would result in an unconditional NFA determination for the Site from Ecology under the VCP.

If concentrations of petroleum hydrocarbons and constituents in soil samples collected proximate to the former USTs do not exceed MTCA cleanup levels, a limited soil investigation report documenting the work and conclusions will be issued to Ecology for review and opinion with a request for consideration of an unconditional NFA determination for the Site.

Interpretation of available information indicates that three of the four USTs active when the former gas station and automotive repair shop ceased operations were situated beneath the existing parking garage concrete floor slab or west-adjacent planter strip. The fourth active UST was situated beneath the northwest corner of the space now occupied by the restaurant. Two other USTs, reportedly decommissioned in-place and out-of-service when the former gas station and automotive repair shop ceased operations, were situated beneath the central portion and the southeast corner of the restaurant. Additional information regarding the capacity and contents of the former USTs is provided below.

SCOPE OF WORK

The limited soil investigation is designed to assess whether soil impacted by former Site operations remains at the Site proximate to the locations of the former USTs. The scope of work proposed to Endolyne has been allocated to the following three tasks.

TASK 1: PROJECT MANAGEMENT AND COMMUNICATIONS

Task 1 includes project management duties, including coordination of Farallon personnel and communications with Endolyne and Ecology.

TASK 2: LIMITED SOIL INVESTIGATION

Task 2 includes preparation of a Health and Safety Plan and coordination of subcontractors for underground utility location, drilling services, concrete coring, and laboratory analytical testing. Task 2 also includes advancing soil borings using a small limited-access drill rig where feasible, and a hand-operated auger where access limitations preclude use of a drill rig. Up to nine borings adjacent to the approximate locations of the former USTs are planned to be drilled and sampled over the course of 1 day. Soil borings will be positioned within the property boundary and as close as possible to the former UST locations, with samples collected from outside of

¹ *Guidance for Remediation of Petroleum Contaminated Sites*. Washington State Department of Ecology, Toxics Cleanup Program. Publication No. 10-09-057. September 2011.



excavation backfill. Soil borings will not be advanced through the floor of the existing restaurant at this time. Up to four soil borings will be advanced through holes cored in the concrete floor slab in the garage. Four soil borings will be positioned in the landscaping planter between the west wall of the existing building and the sidewalk. One soil boring will be positioned in the east side yard adjacent to the south end of the east wall of the existing building as close as possible to the former USTs beneath what is now the restaurant. Field notes documenting methods and observations will be recorded and will include lithologic logs and photoionization detector (PID) readings of volatile organic constituents. Sampling locations will be measured relative to a common Site datum.

Up to two soil samples will be collected using standard Farallon operating procedures for environmental sampling from each soil boring at depths of approximately 3 to 12 feet below ground surface (bgs). Soil samples collected from borings B-1 and B-2 proximate to the two former oil USTs (Figure 1) will be tested for total petroleum hydrocarbons as diesel-range organics (DRO) and as oil-range organics (ORO) using Northwest Method NWTPH-Dx. Up to two samples from borings B-1 and B-2 will be tested also for halogenated volatile organic compounds (HVOCs), carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and naphthalene, and polychlorinated biphenyls (PCBs) using U.S. Environmental Protection Agency (EPA) Methods 8260C, 8270/SIM, and 8082A, respectively.

Soil samples collected from borings B-3 through B-9 proximate to the four former gasoline USTs (Figure 1) will be tested for GRO and BTEX using WTPH-Gx/EPA Method 8021B. If GRO is detected, up to three samples will be tested also for the fuel additives methyl tertiary-butyl ether (MTBE), 1,2-dibromomethane (EDB), and 1,2-dichloroethane (EDC), and total lead using EPA Methods 8260C and 6020A/200.8, respectively.

Proposed soil sampling and analytical testing is summarized below. General Site features, locations of former USTs, and approximate locations of proposed boring locations are shown on Figure 1. UST identification is consistent with the numbering used in the UST Closure Report.

UST	Previous Contents	Date of Removal	Estimated Capacity (gallons)	Location	GRO/BTEX	MTBE/EDB/EDC ¹	Total Lead ¹	DRO/ORO	HVOCs ¹	cPAHs/naphthalene ¹	PCBs ¹
1	Oil	7/17/1989	150	B-1				2	1	1	1
2	Oil	7/17/1989	330	B-2				2	1	1	1
3	Gasoline	7/19/1989	5,000	B-3	2						
				B-4	2						
				B-5	2	1	1				
4	Gasoline	7/19/1989	5,000	B-6	2						
				B-7	2						
				B-8	2	1	1				
5	Gasoline	8/18/1989	1,000	B-9	2	1	1				
6	Gasoline	8/18/1989	1,000								
Total Number of Analyses					14	3	3	4	2	2	2

NOTES:

¹ Constituents to be analyzed for if GRO, DRO, or ORO is detected.



Soil borings will be backfilled with bentonite chips or a concrete/bentonite slurry, and borings advanced through the concrete floor slab of the garage will be patched with concrete. Investigation-derived waste (soil cuttings) will be stored in labeled drums on the Site.

TASK 3: REPORTING

Task 3 includes preparation of one to four draft tables presenting analytical results, and a draft map showing the locations of the soil borings and general Site features. These documents will be used for discussion and to plan for additional work if necessary, and will be components of future formal reporting.

Additional reporting under Task 3 is dependent upon findings of Task 2. If analytical data do not indicate that contaminated soil remains proximate to the locations of the former USTs, Ecology may be amenable to reviewing a limited soil investigation letter report documenting results of Task 2 for regulatory opinion and consideration of an NFA determination. If analytical data confirm the presence of contamination from former Site operations, it may be advisable for Endolyne to conduct additional Site investigation prior to formal reporting.

Please contact either of the undersigned at (425) 295-0800 if you have questions or comments regarding this scope of work.

Sincerely,

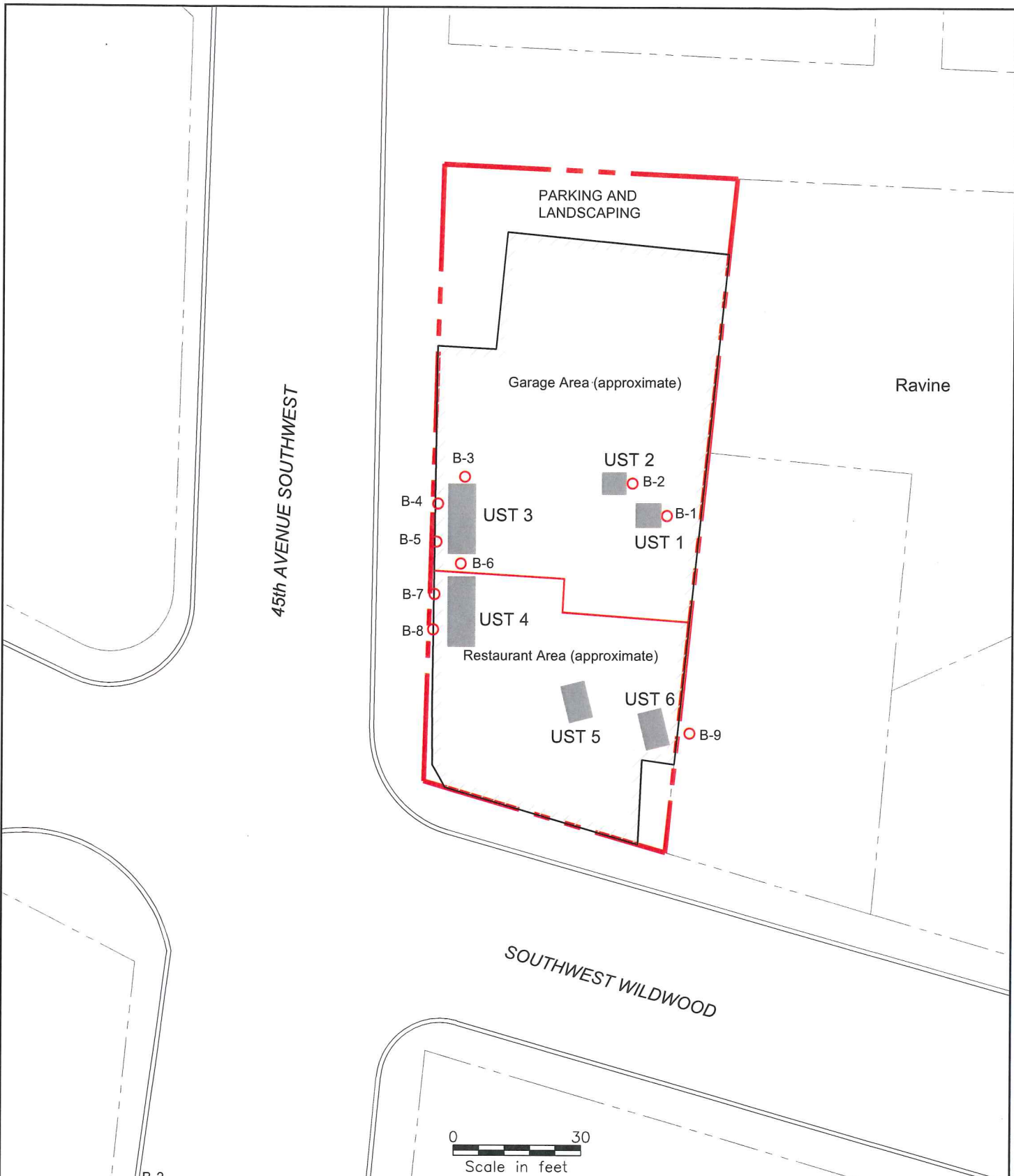
Farallon Consulting, L.L.C.

Thaddeus Cline, P.E., L.G., L.H.G.
Principal Civil Engineer/Hydrogeologist

Clifford T. Schmitt, L.G., L.H.G.
Principal Hydrogeologist

Attachment: Figure1, *Site Plan*

TC/CTS:bjj



- LEGEND**
- B-2 PROPOSED BORING LOCATION (APPROXIMATE)
 - SITE BOUNDARY
 - PARCEL BOUNDARY
 - BUILDING FOOTPRINT
 - HISTORIC UNDERGROUND STORAGE TANKS

ALL LOCATIONS ARE APPROXIMATE




FARALLON CONSULTING
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FIGURE 1

SITE PLAN
 ENDOLYNE GARDEN APARTMENTS
 9212 45TH AVENUE SOUTHWEST
 SEATTLE, WASHINGTON

FARALLON PN:1295-001

Drawn By: DEW	Checked By: TC	Date: 6/24/14	Disk Reference: 1295001
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