



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 6, 2015

Mr. Tim Brennan
B & B Alpine Properties, LLC
851 Mission Road
Walla Walla, WA 99362

Re: No Further Action at the Following Site:

- **Site Name:** Rental Service Corp 563
- **Site Address:** 9045 Willows Road NE, Redmond, WA 98052
- **Facility/Site No.:** 80525264
- **Cleanup Site No.:** 6691
- **VCP Project No.:** NW2991

Dear Mr. Brennan:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Rental Service Corp 563 facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release:



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- Benzene, toluene, ethylbenzene, xylenes (BTEX), total petroleum hydrocarbons in the gasoline (TPH-G) and diesel (TPH-D) ranges into the soil.
- Toluene, ethylbenzene and xylenes into the ground water.

Enclosure A includes a detailed description and diagrams of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel associated with this Site is affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. URS, UST Site Assessment RSC Equipment Rental, April 24, 2012.
2. Environmental Associates, Inc., Phase II Soil and Groundwater Assessment Equipment Rental Facility, February 1, 2012.
3. Environmental Associates, Inc., Confirmation Subsurface Sampling & Testing, June 8, 2015.
4. Environmental Associates, Inc., Phase II Supplemental Assessment Former rental Service Corporation Facility, July 29, 2015.

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at (425) 649-7235 or sending an email to: nwro_public_request@ecy.wa.gov.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined that the Site characterization work completed prior, during, and following the 2012 underground storage tank (UST) removal is sufficient to establish

cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance established for the Site meet the substantive requirements of MTCA.

Because the Site is located adjacent to an area to the south locally designated as environmentally sensitive and a native growth protection area it does not meet any of the exclusions for a terrestrial ecological evaluation (WAC 173-340-7491). As a result, a Site-specific ecological evaluation applies per WAC 173-340-7491 (2)(a)(i). After reviewing the information for the Site, Ecology has determined that, per WAC 173-340-7493(2)(i), the remaining soil concentrations do not exceed the ecological indicator concentrations described in Table 749-3 (100 milligrams per kilogram (mg/kg) for TPH-G). Therefore, no additional evaluation of this pathway is needed.

a. Soil

Recent soil analytical results were compared to MTCA Method A cleanup levels for unrestricted land use. A MTCA Method A cleanup level of 100 mg/kg was selected for TPH-G in soil since no benzene was detected during the last sampling event. MTCA Method A cleanup levels for unrestricted land use are appropriate cleanup levels for the Site.

The soil point of compliance is the standard point of compliance which is throughout the Site. This point of compliance is protective of both direct contact and any potential leaching to ground water.

b. Ground Water

The ground water at this Site is classified as potable to protect drinking water sources. Ground water concentrations were compared to Method A cleanup levels. Ecology concurs with the selection of Method A.

The point of compliance for ground water is the standard point of compliance which is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest depth which could potentially be affected.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The selected cleanup action was over-excavation of contaminated soil during UST removal. Soil and ground water sampling conducted in 2015 demonstrate that these actions eliminated the potential source of contamination to the ground water.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

Tank removal and excavation of soil impacted with TPH-G, TPH-D, and BTEX appears to have removed any potential source of contamination to the ground water.

An indeterminate amount of soil impacted with TPH-G remains in the former location of the dispenser; however the concentrations present are below the MTCA Method A cleanup level. Ground water samples collected in 2012 from soil borings prior to tank removal were analyzed for TPH-G, TPH-D, TPH-O and BTEX. No contaminants were detected above the MTCA Method A cleanup levels. An additional ground water sample was collected in 2015 (post tank removal) in the inferred hydraulically downgradient location (northeast) from the dispenser area. This ground water sample was analyzed for TPH-G and BTEX. Results were non-detectable indicating that ground water has not been impacted.

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List and Leaking Underground Storage Tank List.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

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2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project NW2991.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (425) 649-7058 or e-mail at taca461@ecy.wa.gov.

Sincerely,



Tamara Cardona, PhD
Toxics Cleanup Program

Enclosures: A – Description and Diagrams of the Site

cc: Robert Roe, Environmental Associates, Inc.
Dolores Mitchell, VCP Financial Manager, 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 gasoline and diesel range petroleum hydrocarbons (TPH-G and TPH-D), benzene, toluene, ethylbenzene and xylenes (BTEX) in soil and toluene, ethylbenzene and xylenes in ground water at 9045 Willows Road NE in Redmond, WA (Property). The Property corresponds to King County tax parcel number 032505-9178 which is 0.73 acres in size.

Area and Property Description: The Property is located in an area that has been developed primarily for commercial uses. The Property is bounded by 91st Street followed by a convenience market to the north; an Arco gas station to the south; Willows Road to the east, and an industrial/warehouse complex to the west.

Property History and Current Use: The existing 3,000-square foot masonry structure was built in 1971. Previous uses of the Property included the lease, sale, storage and maintenance of heavy construction equipment.

Three underground storage tanks (UST) were present on the Property and removed in 1990. At that time, soil and ground water contamination were identified on the Property and 70 cubic yards of contaminated soil were excavated, land-farmed and transported off-Site. Following the 1990 UST removals, two new replacement USTs were installed into the excavation to contain diesel and unleaded gasoline. In 1996, ground water around the former UST area was assessed during a Property transaction. The findings of this investigation were reported to Ecology and a "no further action" determination was issued in July 1997. The second set of USTs was removed in 2012. The Property is currently being used as a boat sales and maintenance facility.

Sources of Contamination: The source of contamination at the Site is the fuel piping and dispensers removed in 2012.

Physiographic Setting: The Site is located in the Puget Sound Lowland Physiographic Province, a north-south trending structural and topographic depression that is bordered on its west side 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 non-glacial sediments.

Surface/Storm Water System: The surface water body closest to the Site is a small creek which is a tributary to the Sammamish River about 100 feet south of the Property. Surface water runoff in the area is captured in municipal storm drains and transported to the nearest surface water drainage.

Ecological Setting: The surface of the Property is covered with pavement and a building. The Property is located immediately north of a wooded area surrounding a tributary to the

Sammamish River. The area has been designated by the City of Redmond as a “native growth protection area” and a “sensitive area”. Surrounding land uses are commercial and industrial. A park, Willows Creek Neighborhood Park, and a golf course, Willows Run Golf Course, are both located less than 0.5 miles from the Property. Both areas as well as the wooded southern lot may attract wildlife.

Geology: The soils observed during soil boring installation consisted of an upper two foot layer of sand and gravel fill. Underlying this fill, native soils consist of sandy silts and silty sands up to the maximum depth explored of eight feet below ground surface (bgs).

Ground Water: Ground water has been measured in temporary monitoring wells at depths of approximately five feet bgs. The ground water flow direction is assumed to be to the northeast based on the Site topography. A contaminated site located approximately 2000 feet southeast of the Site at 8509 154th Avenue NE documented ground water flow to the northeast.

Water Supply: Redmond’s drinking water is partly from the Cascade Water Alliance (its source is the Tolt River), and five wells that serve areas east of the Sammamish River. Since the Property is located west of the Sammamish River, its water is from the Cascade Water Alliance.

Release and Extent of Soil and Ground Water Contamination: In January 2012, a Phase II Soil and Groundwater Assessment was conducted on the Property. Eight borings were advanced in areas of potential contamination such as near or adjacent to: the UST tank pad, fueling area, downgradient of fueling area, adjacent to the oil/water separator, the parts cleaning station, former location of an above-ground diesel tank, and inside a service bay. Temporary well screens were installed in each of the borings and ground water samples were collected. All soil and ground water samples were analyzed for TPH-G, TPH-D, TPH-O and BTEX. One soil and one ground water sample were also analyzed for volatile organic compounds. Low detections of BTEX were present in ground water in one of the borings but none of the soil or ground water samples contained contaminant concentrations that exceeded MTCA Method A cleanup levels.

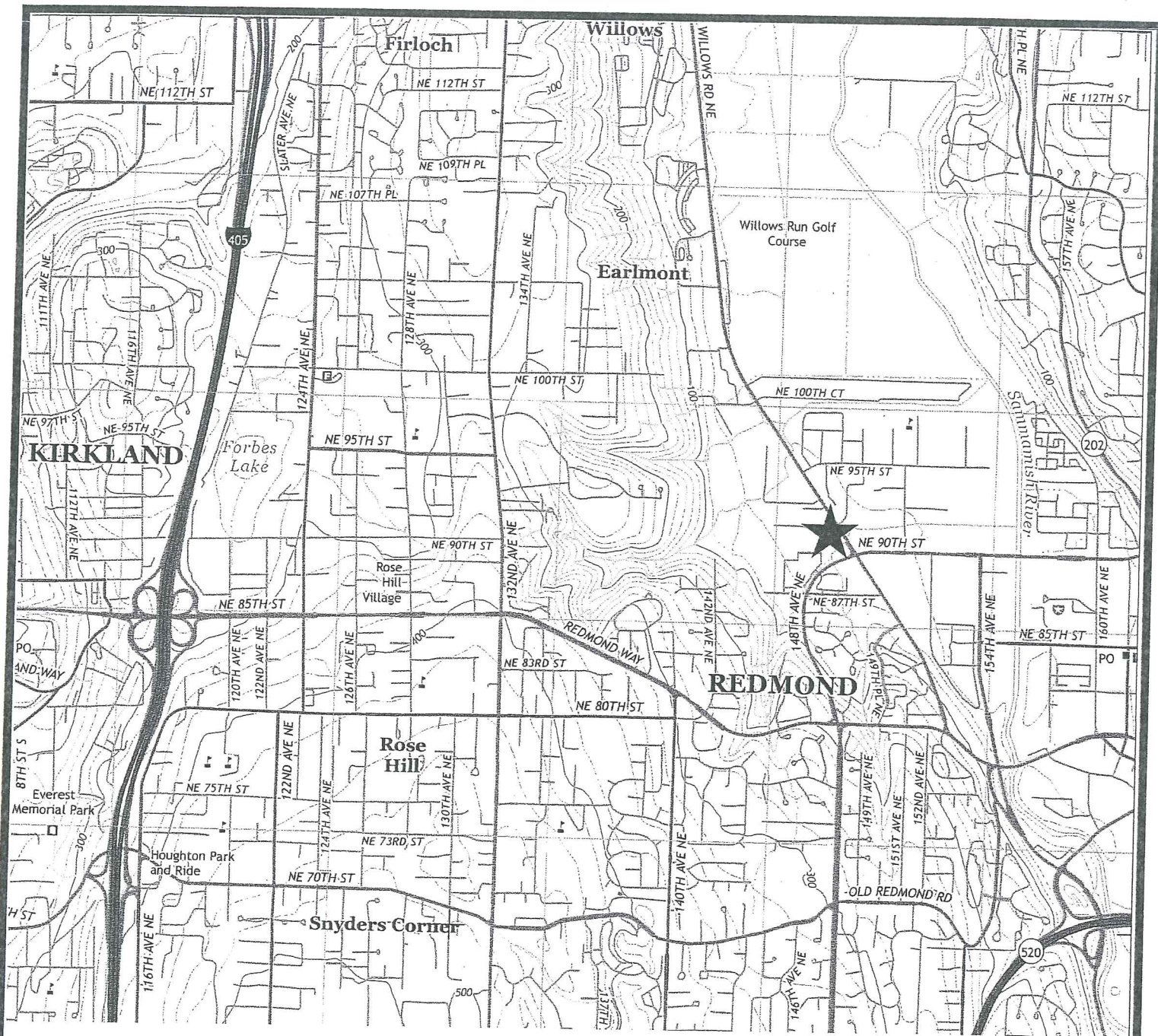
In March 2012, the tanks were removed from the Site and soil samples were collected from the bottom of the excavation. Soil samples were analyzed for TPH-G, TPH-D, TPH-O and BTEX. The tanks were in excellent condition and no contamination was detected during excavation. However, two soil samples collected beneath the dispenser and piping run had benzene detections above the MTCA Method A cleanup levels with concentrations of up to 0.15 mg/kg. This area beneath the dispenser was then excavated an additional one to two feet in depth and samples were collected at the new excavation bottom boundary. Benzene was detected at a concentration of 0.21 mg/kg, also above the MTCA Method A cleanup level at a depth of two feet bgs. No ground water samples were collected during tank removal.

In July 2015, an additional four soil borings were advanced on the Property to assess the status of the remaining benzene contamination. Three borings were placed within the former location of the dispenser, where benzene was detected, and samples were collected from each soil boring

between 3.5 and 4.5 feet bgs and at six feet bgs and analyzed for TPH-G and BTEX. TPH-G was detected in all the samples collected at depths of four feet at concentrations ranging from 37 to 80 mg/kg, below the Method A cleanup level. No other contaminants were detected in soil.

A fourth boring (B-12), equipped with a temporary well screen over a depth interval from five to nine feet bgs was located in the inferred hydraulically downgradient location (northeast) from the tanks and dispenser. Groundwater was encountered at a depth of six feet bgs. The ground water sample collected from B-12 analyzed for TPH-G and BTEX contained non-detectable levels.

Site Diagrams



Approximate property location.



Inferred groundwater flow direction based on the local topographic gradient.



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

Vicinity/Topographic Map

Former Rental Service Corp Facility
9045 Willows Road NE
Redmond, Washington 98052

Job Number:

JN-31187-1

Date:

July 2015

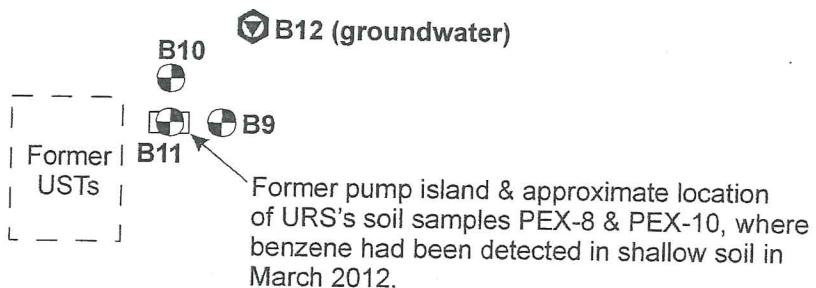
Plate:

1

NE 91st Street

Parcel Boundary

Willows Road



- ⊕ Temporary borings to re-test soil for gasoline/benzene, made by EAI in July 2015.
- ⊖ Temporary boring to re-test groundwater for gasoline/benzene at a location both proximal too and inferred down-gradient from the former fuel dispenser area.
- ➔ Suspected groundwater flow direction, based upon local topography and surface-water drainage patterns.



**ENVIRONMENTAL
ASSOCIATES, INC.**
1380 112th Avenue N.E., St. 300
Bellevue, Washington 98004

EXPLORATION PLAN

Former Rental Service Corp Facility
9045 Willows Road NE
Redmond, Washington 98052

Job Number:

JN-31187-1

Date:

July 2015

Scale:

1"=20'

Plate:

2

NE 91st Street

Temporary boring locations from
January 2012 investigation.

