

August 11, 2015

Ms. Louise Bardy
VCP Unit Supervisor
Washington State Department of Ecology, NWRO
3190 160th Avenue Southeast
Bellevue, Washington 98008

Re: Cleanup Status – Former Stoneway Concrete Batch Plant
1915 SE Maple Valley Highway, Renton, Washington
Facility/Site No. 622443702
VCP Project No. NW1702

EPI Project Number: 43101.4

Dear Ms. Bardy:

On behalf of Stoneway Concrete, Inc. (Stoneway), Environmental Partners, Inc. (EPI), has prepared this Cleanup Status Letter for the ongoing remedial actions being conducted at the former Stoneway Concrete Batch Plant located at 1915 Southeast Maple Valley Highway, in Renton, Washington (Site). This letter is in response to the Washington State Department of Ecology's (Ecology's) Status Request Letter dated July 14, 2015. For the reasons stated in this letter, Stoneway requests that the Site remain in the Voluntary Cleanup Program (VCP).

ONGOING REMEDIAL ACTIONS

EPI prepared a *Cleanup Action Plan (CAP)* dated March 9, 2009, describing soil and groundwater remediation procedures and cleanup levels (CULs) of contaminants of concern (COCs). The CAP was reviewed and approved by Ecology and soil remediation was completed in 2010. The results of the cleanup action were documented in EPI's report entitled *Interim Action Report*, dated October 12, 2011. That report was also provided to Ecology.

The CAP proposed post-excavation groundwater monitoring to assess residual low-level dissolved concentrations of formaldehyde and arsenic, and to evaluate the potential seasonal variations in groundwater flow direction. Due to the low levels of formaldehyde and arsenic, the CAP anticipated that those compounds would best be addressed through natural attenuation processes following the extensive source removal. EPI and Stoneway met on at least two occasions with Ecology representatives including Mr. Mark Adams and Mr. Bob Warren. In response to those meetings, an additional well (MW-10) was installed in October 2012 as close as possible to the Cedar River to address Ecology's primary concern that seasonal groundwater migration to the river would result in a surface water exposure pathway.

Groundwater was sampled and monitoring has been performed on a routine basis from about June 2009 through the present, and groundwater samples were analyzed for formaldehyde and total arsenic. The sampling results from March 2009 through July 2015 are summarized in Figure 1.

Formaldehyde concentrations have consistently been less than the current Model Toxics Control Act Regulation (WAC 173-340; MTCA) Method B groundwater cleanup level of 1,600 micrograms/liter ($\mu\text{g/L}$). The CAP used the Johnson and Ettinger Model to develop a formaldehyde cleanup level for groundwater (142 $\mu\text{g/L}$) that is protective of the MTCA Method B Indoor Air Cleanup Level. Formaldehyde concentrations in groundwater have consistently been less than this concentration; the maximum concentration of formaldehyde ever detected at the Site is 16 $\mu\text{g/L}$.

Total arsenic concentrations have been steadily decreasing over the last couple of years and in January and April 2015 all samples were less than the MTCA Method A Groundwater cleanup level of 5.0 $\mu\text{g/L}$. In July 2015 only one well (MW-7) was found to have a concentration of arsenic greater than the cleanup level and that concentration was only 5.1 $\mu\text{g/L}$. It is believed this is a temporary condition within an overall declining trend and that future concentrations are likely to comply with the cleanup level. Formaldehyde and arsenic concentrations in the two downgradient wells (EPI-MW-1 and MW-1) have been less than cleanup levels since sampling was initiated in 2009.

The groundwater flow direction has been calculated for each sampling event since 2009. Figure 2 indicates the most recent groundwater gradient contours and flow direction, which are typical of the previous 6 years. The groundwater flow direction has been consistently to the northwest, away from the Cedar River. This is consistent with historical data previously presented to Ecology and indicates that the Cedar River consistently recharges the local aquifer and that there is not a hydraulic pathway for impacts to the river.

FUTURE REMEDIAL ACTIONS

EPI and Stoneway anticipate collecting the fourth quarter samples in October 2015 and evaluating options for requesting a No Further Action (NFA) determination from Ecology. Stoneway respectfully requests that the Site not be removed from the VCP. This Cleanup Status Letter satisfies Ecology's request for an update of Site activities and a demonstration that meaningful activities have been occurring since our last meeting with Ecology.

If you have any additional questions, please contact me at 425-395-0030.

Sincerely,



Thomas C. Morin, LG¹⁴⁸
President/Principal Geologist

cc: Mr. Jim Blais, Gary Merlino Construction Co, Inc.
Mr. William Joyce, Joyce Ziker Parkinson, PLLC

Enclosures: Figure 1: Site Representation Showing Summary of Groundwater Analytical Results
Figure 2: Site Representation with Groundwater Gradient Contours for July 20, 2015

Figures

MW-1			
Date	Formaldehyde	Arsenic	pH
3/18/09	<5	<5	7.29
6/8/09	<5	<5	7.13
9/29/09	6	<1	7.06
12/14/09	<5	1.1	7.74
3/3/10	<5	<1.8	8.04
6/1/10	<5	<1.8	7.48
9/14/10	<5	<1.8	7.09
12/14/10	<5	<1.8	7.80
3/2/11	<5	<1.8	6.65
5/15/12	NA	<1.0	6.60
10/9/12	NA	1.0	6.27
4/23/13	<5	<1.0	7.36
10/21/13	NA	<1.0	6.95
1/23/14	NA	1.3	7.16
7/14/14	<1	<1.0	6.88
1/12/15	NA	<1.0	6.59
4/13/15	<4	1.3	6.98
7/20/15	<2	<1.0	7.09

EPI-MW-1			
Date	Formaldehyde	Arsenic	pH
3/18/09	<5	<5	7.28
6/8/09	<5	<5	6.96
9/29/09	<5	1.7	7.24
12/14/09	<5	1.6	7.42
3/3/10	<5	2.4	7.86
6/1/10	<5	<1.8	7.66
9/14/10	<5	2.1	7.14
12/14/10	<5	<1.8	7.58
3/2/11	<5	2.5	7.11
5/15/12	NA	1.1	6.94
10/9/12	NA	1.4	6.43
4/23/13	<5	<1.0	7.64
10/21/13	NA	1.5	7.10
1/23/14	NA	1.5	7.14
7/14/14	<1	1.6	7.24
1/12/15	NA	<1.0	7.65
4/13/15	<4	<1.0	6.60
7/20/15	<2	<1.0	6.96

EPI-MW-9			
Date	Formaldehyde	Arsenic	pH
6/8/09	<5	7	7.98
9/29/09	<5	5.7	7.95
12/14/09	<5	5.8	8.26
3/3/10	<5	6.6	8.00
6/1/10	5	6.4	8.58
9/14/10	<5	6.6	8.12
12/14/10	<5	6.3	8.23
3/2/11	<5	7.8	7.99
1/27/12	NA	6.6	9.25
5/15/12	NA	8.1	7.22
10/9/12	<5	7.6	7.47
1/17/13	NA	6.6	8.83
4/23/13	<5	5.9	8.53
7/30/13	NA	7.5	8.42
10/21/13	<1	6.6	8.18
1/23/14	NA	5.9	7.30
7/14/14	<1	6.0	8.06
1/12/15	<2	3.9	8.26
4/13/15	<4	3.9	6.16
7/20/15	<2	4.2	7.09

EPI-MW-7			
Date	Formaldehyde	Arsenic	pH
6/8/09	<5	7	10.82
9/29/09	<5	5.8	11.43
12/14/09	<5	7.7	10.34
3/3/10	<5	5.7	8.58
6/1/10	16	4.9	11.41
9/14/10	<5	7.3	9.35
12/14/10	<5	4.8	9.33
3/2/11	<5	5.2	8.31
1/27/12	NA	5.9	9.40
5/15/12	<6	5.7	8.45
10/9/12	<5	9.7	8.52
1/17/13	NA	6.5	7.65
4/23/13	<5	4.2	9.05
7/30/13	NA	7.3	7.70
10/21/13	<1	4.7	8.39
1/23/14	NA	5.2	7.41
7/14/14	<1	5.6	8.85
1/12/15	<2	3.7	8.77
4/13/15	6	4.3	7.90
7/20/15	<2	5.1	7.59

EPI-MW-10			
Date	Formaldehyde	Arsenic	pH
10/9/12	<5	17	10.27
1/17/13	NA	6.8	11.94
4/23/13	<5	3.8	11.44
7/30/13	NA	5.9	11.36
10/21/13	<1	6.0	11.69
1/23/14	NA	4.3	11.40
7/14/14	<1	4.1	11.83
1/12/15	<2	2.5	11.02
4/13/15	8	2.7	11.32
7/20/15	<2000	3.6	11.83

NOTES:

- FENCE
- - - EXCAVATION BOUNDARY
- ⊕ MONITORING WELL
- NA - NOT ANALYZED

CLEANUP LEVELS:
 Formaldehyde - 142 µg/L
 (Protective of Indoor Air)
 Arsenic - 5 µg/L

UNITS OF REPORTED FORMALDEHYDE AND ARSENIC ARE µg/L

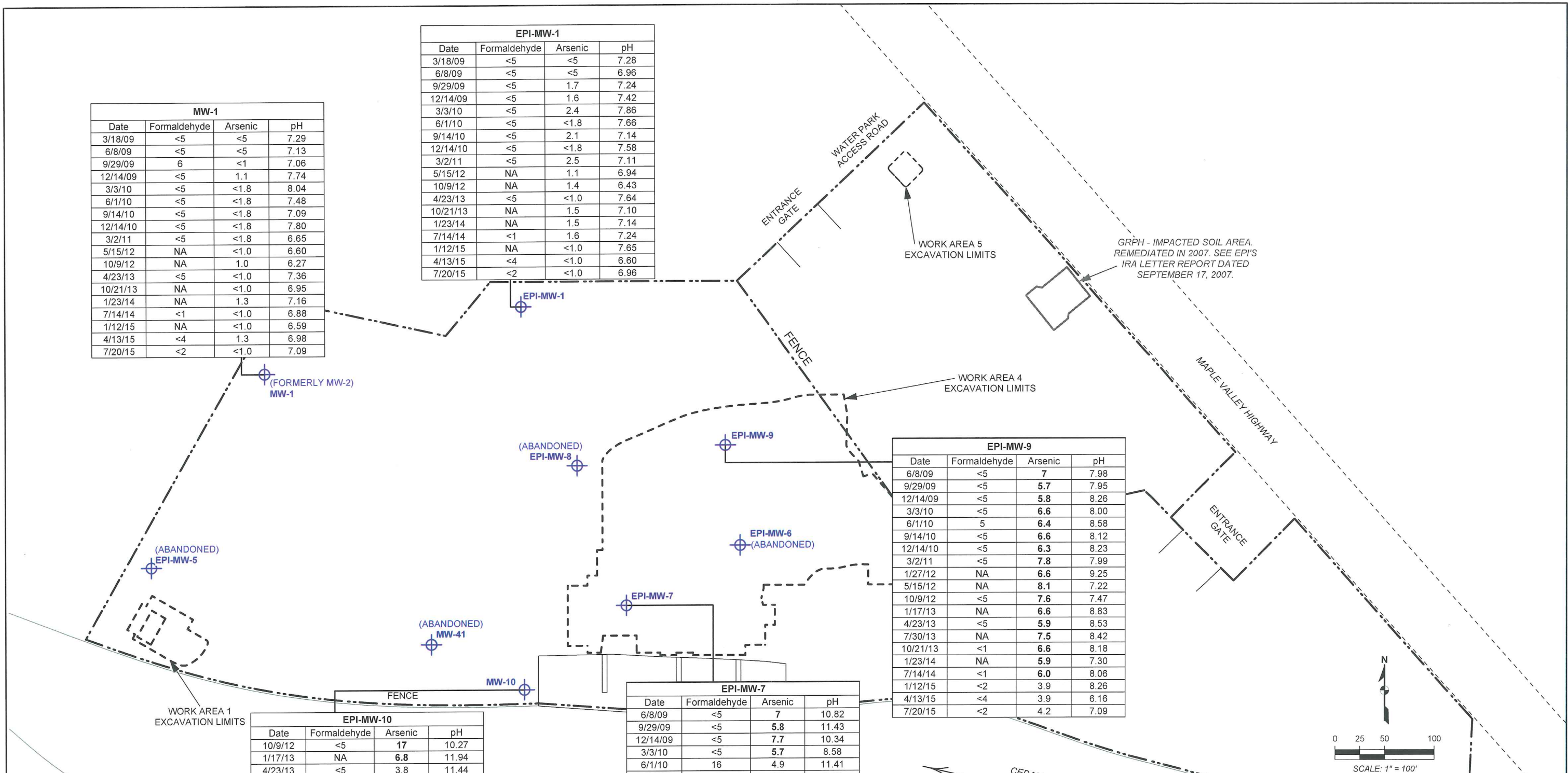
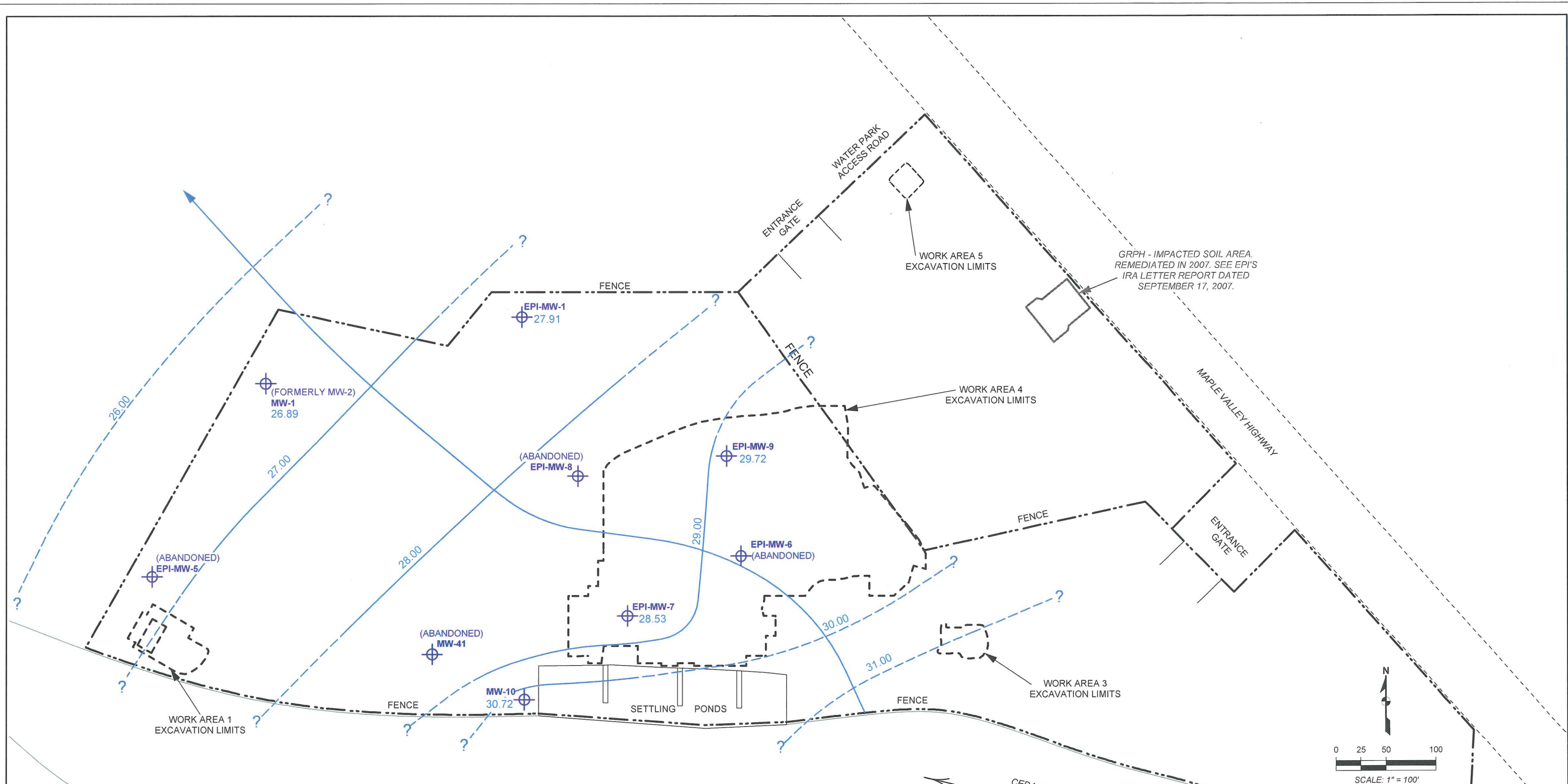


FIGURE 1
 SITE REPRESENTATION SHOWING SUMMARY
 OF GROUNDWATER ANALYTICAL RESULTS

PREPARED BY	epi ENVIRONMENTAL PARTNERS INC		
REPORT	JULY 2015 UPDATE		
LOCATION	1915 SE MAPLE VALLEY HIGHWAY RENTON, WASHINGTON		
PREPARED FOR	STONEMAN CONCRETE		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
07/29/15	VPB/CLM	ELC	43101.4



NOTES:

	FENCE
	EXCAVATION BOUNDARY
	EXISTING MONITORING WELL WITH GROUNDWATER ELEVATION
	GROUNDWATER CONTOUR - DASHED WHERE INFERRED, QUERIED WHERE UNKNOWN
	APPROXIMATE GROUNDWATER FLOW DIRECTION

FIGURE 2
SITE REPRESENTATION WITH GROUNDWATER GRADIENT CONTOURS JULY 20, 2015

PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	JULY 2015 UPDATE		
LOCATION	1915 SE MAPLE VALLEY HIGHWAY RENTON, WASHINGTON		
PREPARED FOR	STONEMAN CONCRETE		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
07/29/15	VPB/CLM	ELC	43101.4



Letter of Transmittal

To: Ms. Louise Bardy, VCP Unit Supervisor
WA Department of Ecology - NWRO
3190 160th Avenue SE
Bellevue, WA 98008

Date: August 11, 2015

Project No: 43101.4

From: Thomas C. Morin, L.G.

RE: Stoneway Concrete Batch Plant
1915 SE Maple Valley Highway
Renton, Washington

We are sending the following items:

Date	Number of Copies	Description
August 11, 2015	1	Cleanup Status – Former Stoneway Concrete Batch Plant

- For your information For action specified below For review and comment
 For your use As requested