



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

November 24, 2015

Mr. Greg Rairdon
PO Box 2879
Kirkland, WA 98083

Re: No Further Action at the Following Site:

- **Site Name:** Burien Honda
- **Site Address:** 15026 1st Avenue South, Seattle, WA
- **Facility/Site No.:** 59359661
- **Cleanup Site ID No.:** 9839
- **VCP Project No.:** NW2922

Dear Mr. Rairdon:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Burien Honda 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 information and data provided in the Site Exploration report dated October 7, 2015. In response to Ecology's Further Action determination in an opinion letter dated January 21, 2015, the report documents the remedial activities that have addressed Ecology's concerns regarding contamination in the soil and ground water at the Site.

This opinion is also 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 releases:

- Total Petroleum Hydrocarbons-Gasoline Range Organics (TPH-GRO), Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) in Soil and Ground Water.

Basis for the Opinion

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

1. E3RA, Inc., Remediation Closeout Report, April 17, 2014.
2. G-logics, Inc., Site Exploration, October 7, 2015.

The documents listed above are kept in the Central Files of the Northwest Regional Office (NWRO) of Ecology 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 further clean up the contaminated soil at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards, and select a cleanup action. The Site is described above and in **Enclosure A**.

The selected cleanup action was the removal of contaminated soil exceeding MTCA Method A cleanup levels and confirmation of the ground water quality. The cleanup action consisted of the following steps:

- a. In 2013, approximately 1,800 cubic yards of contaminated soil were excavated after two underground storage tanks (USTs), a 300-gallon waste oil and a 3,000-gallon gasoline, were decommissioned and removed from the Property. The maximum GRO contamination in the removed soil was 1,400 mg/kg at B2. The

analytical results of soil samples collected from the bases and sidewalls of the two excavations indicated that the concentrations of chemicals of concern (COCs) remaining in place were below MTCA Method A cleanup levels.

- b. Following the UST closure, a supplemental Site assessment performed later in 2013 revealed ground water at the Site was impacted by petroleum hydrocarbons as well. However, there still was a data gap to fully characterize the ground water contamination plume.
- c. In compliance with Ecology's requirements in January 2015, two additional ground water monitoring wells were installed in September 2015 at locations beneath and downgradient of the former USTs. Ground water was encountered approximately at depths of 26 to 28 feet below ground surface (bgs). Soil and ground borings were advanced to approximately 33 feet bgs for analysis of GRO and BTEX.
- d. The latest laboratory analytical results of the soil and ground water samples confirmed that the detected COCs were at concentrations below the laboratory reporting limits or below MTCA Method A cleanup levels at this Site.

2. Establishment of cleanup standards.

a. Substance-specific standards and points of compliance.

- Ecology has determined the points of compliance you established for the Site meet the substantive requirements of MTCA.
- Cleanup levels for soil contamination at this Site are defined as the MTCA Method A cleanup levels, which are classified for unrestricted land use.

The point of compliance for contaminated soil is based on the protection of ground water and it is applied Site-wide throughout the soil profile, which may extend below the water table.

- Cleanup levels for ground water contamination at this Site are defined as the MTCA Method A cleanup levels.

The point of compliance for ground water is throughout the Site from the uppermost level of the perched zone to the lowest saturated aquifer which could potentially be affected by the Site.

- There is no terrestrial habitat within 500 feet of any part of the Site, which is surrounded by commercial land uses. Therefore, it is not necessary to

further conduct a terrestrial ecological evaluation (TEE) for developing a Site-specific cleanup levels for this Site.

b. Action and location-specific requirements.

The requirements to clean up this Site included removal and disposal of the USTs, excavation of the contaminated soil exceeding the MTCA Method A cleanup levels for unrestricted land use, and clarification of the ground water quality.

3. Selection of cleanup action.

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

- a. Remediations were conducted to remove the USTs and contaminated soil and appropriately dispose of these materials off-Site.
- b. Confirmation soil and ground water samples were collected for laboratory analysis at the Site. One of the temporary confirmation wells was installed in the location where contamination in ground water exceeded MTCA Method A cleanup levels in the UST excavation. Based on the data obtained from a total of seven temporary wells in 2013 and 2015, the results indicated the contaminant concentrations in the soil and ground water samples were either undetectable or were below the MTCA Method A cleanup levels for unrestricted land use.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site at MTCA Method A cleanup levels for all the Site COCs. This determination is based on the following documentations:

- a. The two gasoline USTs were removed and appropriately disposed of off-Site.
- b. The GRO- and BTEX-contaminated soil exceeding MTCA Method A cleanup levels was excavated, which resulted in a total of approximately 1,800 cubic yards removed and disposed of off-Site. The follow-up soil confirmation sample analysis concluded that completion of soil removal to undetectable, or below MTCA Method A cleanup levels was achieved.
- c. Laboratory results of samples collected from the two temporary wells also demonstrated contamination in the ground water did not exceed the cleanup

levels. The temporary well borings were advanced up to approximately 33 feet bgs with five foot long well screens installed between 22 and 32 feet bgs.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our list of hazardous waste sites, including:

- Confirmed and Suspected Contaminated Sites 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).

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).

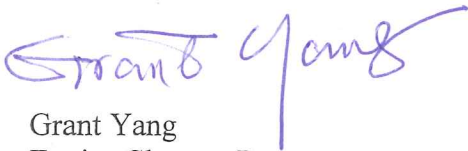
Mr. Greg Rairdon
November 24, 2015
Page 6

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 #NW2922.

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) 649-7126 or e-mail at gyan461@ecy.wa.gov.

Sincerely,



Grant Yang
Toxics Cleanup Program

Enclosures: A - Site Description
B - Site Diagrams

cc: Zackary Wall, G-Logics, Inc.
Sonia Fernandez, VCP Coordinator, Ecology
Dolores Mitchell, VCP Financial Manager, Ecology

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms part of the basis for the opinion expressed in the letter.

Site: The Site is located at 15026 1st Avenue South in Seattle, WA (Property). The Site is defined as a contaminated Site due to petroleum contamination found in soil and ground water. The Property occupies King County tax parcel number 6434400055 which is 1.58 acres in size.

Area and Property Description: The Property is located in a commercial area in the City and the facility has been utilized as a car dealership since it was established in early 1940s.

Property History and Current Use: A 1936 aerial photograph available on King County IMAP shows the Property as cleared undeveloped land with a dirt road or trail running northwest-southeast. The Property was first developed in 1946 for commercial use when a 22,670-square foot masonry building was constructed. The Property previously contained two USTs, a 3,000-gallon gasoline tank and a 300-gallon waste oil tank, which was part of the dealership.

The two USTs were removed in 2012. The current use of the Property is for Burien Honda, an automobile dealership and multiple automotive-service shops, and vehicle parking spaces.

Source of Contamination: Based on previous Site assessment reports, the presence of petroleum hydrocarbons at concentrations exceeding MTCA cleanup levels was confirmed in soil and ground water at this Site. Impacts of these contaminants to the soil and the perched ground water occurred over time through releases from the two former USTs and operations of the facility.

Physiographic Setting: The Site is located at an elevation of approximately 150 feet above mean sea level, on a broad plateau which is adjacent to the western shoreline of Puget Sound. The Site is within a densely-developed neighborhood with a gentle slope toward the west.

Surface/Storm Water System: The closest surface water body to the Site is Lake Burien, which is approximately 3,000 feet to the west. Surface water and storm water runoff on and in the vicinity of the Site disperses via sheet flow to the City of Seattle storm water drainage system.

Ecological Setting: There is no terrestrial habitat within 500 feet of any part of the Site, which is surrounded by commercial land uses.

Geology: The Site and vicinity are underlain by the Vashon till, a dense glacially-derived lithologic unit characterized by poorly-sorted materials. A thin veneer of Vashon recessional outwash deposits is also present overlying the till of the entire area at the Site.

Ground Water: Ground water was present at a depth of approximately 29 feet bgs at the Site. Based on the 2015 Site Exploration report, the ground water flow direction in this region is generally to the south.

Water Supply: Public water supply is currently provided to the Site by the City of Seattle. According to Ecology's well log database, there are no private wells located within approximately 1,000 feet from the Property.

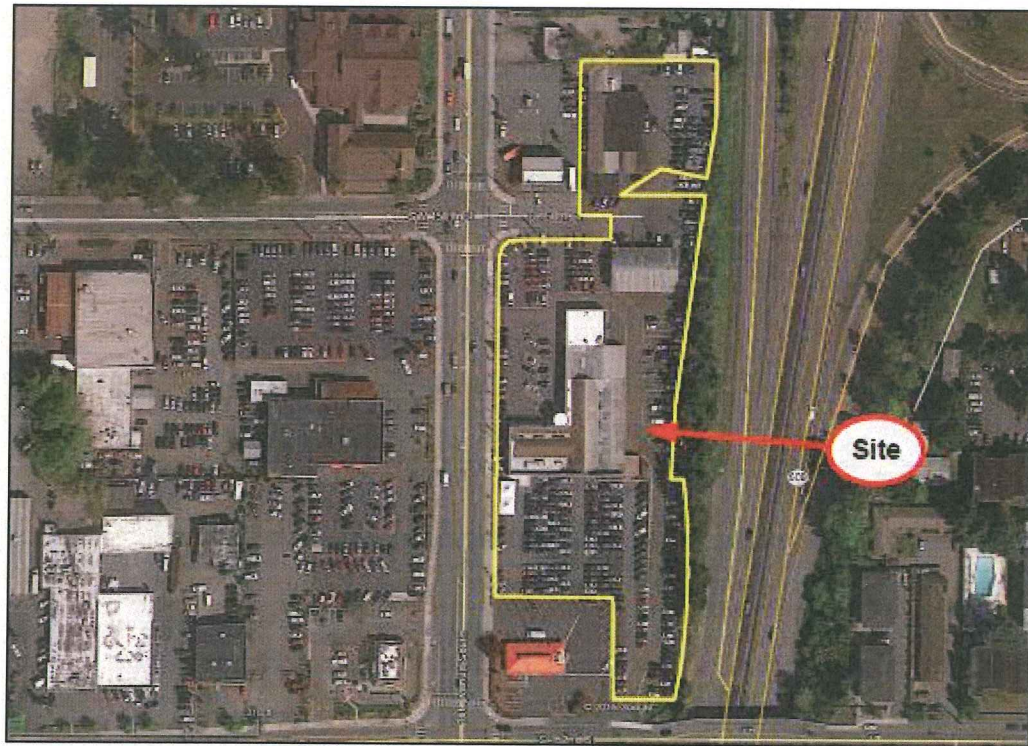
Releases and Extent of Soil and Ground Water Contamination: Soil and ground water were contaminated due to releases from operations of the two former USTs. From 2012 to early 2015, various cleanup efforts were conducted at this Site, which included characterization of contamination in soil and ground water, decommissioning of two USTs and removal of the contaminated soil adjacent to the two USTs.

Soil and ground water contamination was discovered in a Site assessment in 2012 at maximum GRO levels of 1,400 mg/kg, 1,800 mg/L, respectively. During the Site assessment, 18 soil borings were advanced ranging from 3 to 33 feet bgs.

Based on the Phase II Site assessment conducted in 2013, analytical data obtained from 13 soil-boring and five ground water-temporary-well samples showed GRO concentration below the cleanup level.

In September 2015, two additional soil borings were installed up to 33 feet bgs to collect soil and ground water samples for further confirmation analysis. One of the borings was located at the area with the highest GRO concentration found in 2012, and another at the downgradient from the former USTs excavation. Analytical results of the confirmation soil and ground water sampling indicated that the COCs in the soil and ground water were either non-detectable or below MTCA Method A cleanup levels. Therefore, Ecology has determined that the cleanup at this Site is complete.

Figure 1 Location of the Site



g-logics

Site Location Maps
Honda of Burien
15026 1st Avenue South
Burien, Washington

Figure
1

Figure 2 A Site Plan Showing USTS and Soil Excavation at the Site

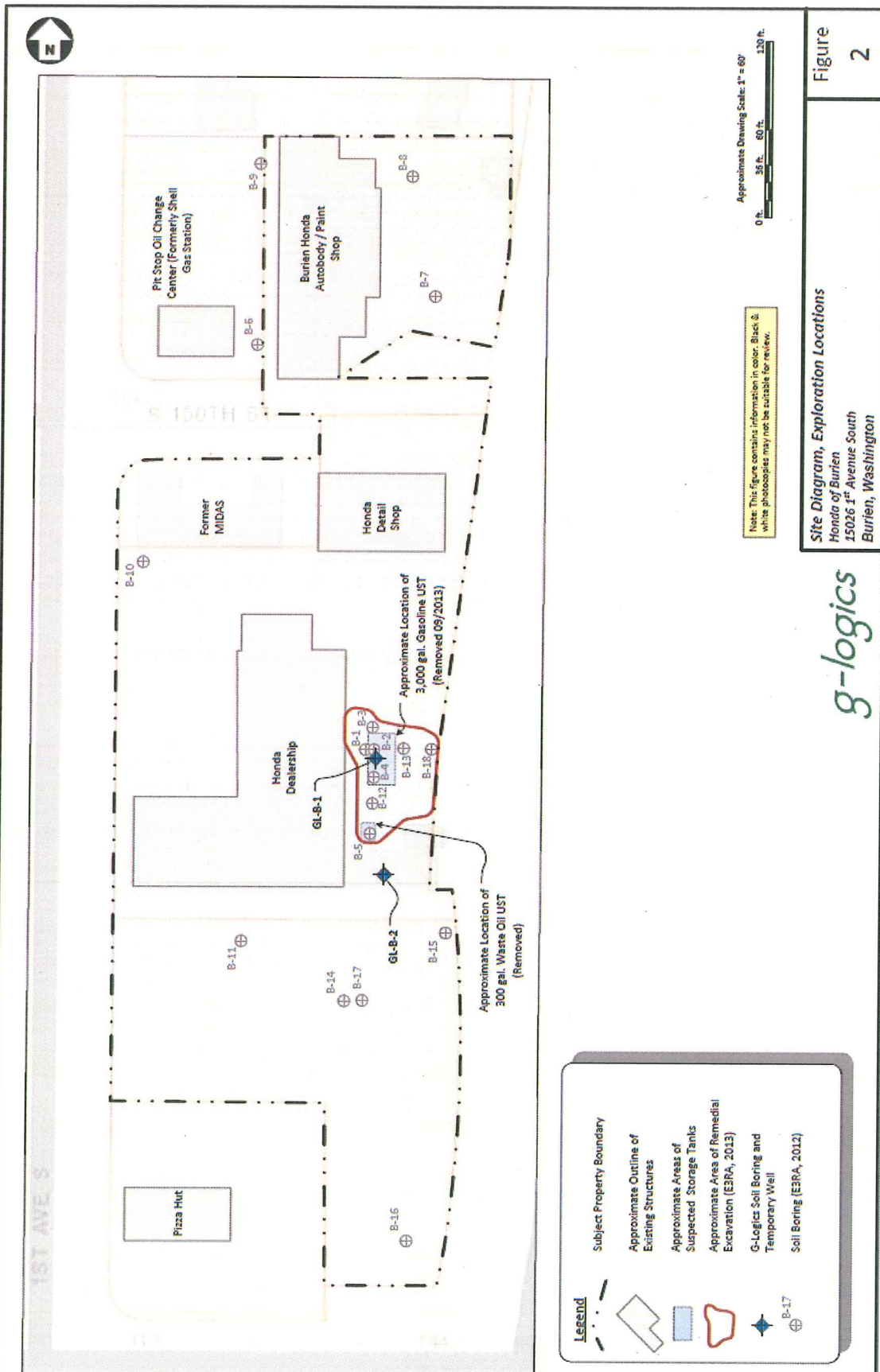


Figure 3 A Site Plan Showing Soil and Ground Water Sampling Locations at the Site

