



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

December 2, 2011

Perry Pineda
Shell Oil Products US
Environmental Services
20945 S Wilmington Avenue
Carson CA 90810

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

- **Name:** Minit Lube 1110
- **Address:** 4906- 25th Avenue NE, Seattle
- **Facility/Site No.:** 41675877
- **Cleanup Site ID:** 6041
- **VCP No.:** NW2079

Dear Mr. Pineda:

Thank you for submitting documents regarding your proposed remedial action for the Minit Lube 1110 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 release(s) at the Site:

- Gasoline-, diesel-, and oil-range total petroleum hydrocarbons (TPHg, TPHd, TPHo), and Benzene, toluene, ethylbenzene, xylene (BTEX) into Soil and Ground Water.

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 does not resolve a person's liability to the state under MTCA or protect a person



December 2, 2011

Page 2

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 action(s):

1. Conestoga-Rovers & Associates. Vapor Investigation Work Plan Jiffy Lube Facility, 4902 25th Avenue NE, Seattle, Washington, VCP No. NW2079. September 2, 2011.
2. Conestoga-Rovers & Associates. Site Investigation Report, 4902 25th Avenue NE, Seattle, Washington, VCP No. NW2079. October 13, 2008.
3. Conestoga-Rovers & Associates. Site Investigation Report, 4902 25th Avenue NE, Seattle, Washington, VCP No. NW2079. June 12, 2007.
4. Nowicki & Associates. University Village Q Lube UST Closure Site Assessment. June 20, 1995.

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 425-649-7190.

The Site is defined by the extent of contamination caused by the following release(s):

- Gasoline-, diesel-, and oil-range total petroleum hydrocarbons (TPHg, TPHd, TPHo), and Benzene, toluene, ethylbenzene, xylene (BTEX) into Soil and Ground Water.

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.

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 following release(s) at the Site, Ecology has determined:**

- The proposed Vapor Investigation Work Plan meets the substantive requirements of MTCA. The results obtained during the investigation will be used to further characterize soil vapor conditions at the Site and identify additional remediation that may be needed to meet MTCA cleanup levels.

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.

If you have any questions regarding this opinion, please contact me at 425-649-7242.

Sincerely,

A handwritten signature in black ink, appearing to read "Libby Goldstein", with a stylized flourish at the end.

Libby Goldstein
NWRO Toxics Cleanup Program

CC: Brian Peters, CRA

Enclosures: 1

Enclosure A

Site Description

Name: Minit Lube 1110

Address: 4906- 25th Avenue NE, Seattle

Facility/Site No.: 41675877

Cleanup Site ID: 6041

VCP No.: NW2079

Site and Property Definition: The site is located at 4906- 25th Avenue NE, Seattle, Washington (the Property). The Site is defined by gasoline-, diesel-, and oil-range total petroleum hydrocarbons (TPHg, TPHd, TPHo) and benzene, toluene, ethyl-benzene and xylenes (BTEX) released to the soil and to groundwater. The Site boundaries have not been defined.

Area Description: The property is located in a mixed commercial and residential area in the University area of Seattle. The property is located on the northeast corner of the intersection of 25th Avenue NE and NE 49th Street. There are apartments located north of the property. The University Village Shopping area is to the east and south of the Property. Offices and commercial businesses are to the west.

Property History and Current Use: The Property is currently a Minit Lube facility. A childcare facility was located in the basement of the building but closed approximately one year ago. In 1995, a 3,000 gallon new oil underground storage tank (UST) was removed from the Property and a 500 gallon used oil UST were closed in place. These tanks were replaced with above ground tanks. According to King County property records, the building was built in 1959

Contaminant Sources and History of Releases: A specific release or releases have not been identified at the Site. When the USTs were removed or closed in place, the source of soil contamination was thought to have originated from the concrete sump floor drain.

Physiographic Setting: The property sits at approximately 35 feet above mean sea level. Lake Washington is approximately 4,000 feet south of the Property.

Surface/Storm Water System: The majority of the property is covered by asphalt and concrete pavement. Runoff from the property flows to catch basins along 25th Avenue NE. The storm drain system is connected to the City of Seattle combined sanitary sewer and flows are treated at a local waste water treatment facility.

Ecological Setting: Little undeveloped land exists immediately around the Site. There is no significant nearby habitat.

Geology: Ground cover includes 9" of asphalt concrete. Brown sandy fill was observed around the USTs that were removed or closed in place. Underlying the asphalt is brown gravelly sand which becomes clayey gravelly sand between 3' to 9' below ground surface (bgs).

Ground Water: Shallow ground water at the Site occurs within the sand deposits under unconfined conditions. The water table was measured at depths varying between three to four feet bgs.

Water Use: The property is connected to the City of Seattle municipal water system and municipal sewer system. No residential or municipal water wells have been identified in the nearby area.

Release and Extent of Contamination: The release of contaminants to soil and ground water is attributed the USTs that were removed and closed in place in 1995. The extent of contamination has not been completely characterized. The results of the soil vapor study will be used to characterize the site and determine additional remedial actions that are needed at the Site to meet MTCA cleanup levels.

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