



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 7, 2016

MR. ALEX TRUCHOT
GROUP HEALTH/CBRE
12501 E. MARGINAL WAY S, ASB-1
TUKWILA, WA 98168-2560

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

- **Site Name:** Group Health Cooperative of Puget Sound
- **Site Address:** 801 SW 16th Street, Renton, WA 98055
- **Facility/Site No.:** 16471336
- **VCP Project No.:** NW 1770
- **Cleanup Site ID No.:** 5599

Dear Mr. Truchot:

Thank you for submitting documents regarding your proposed remedial action for the **Group Health Cooperative of Puget Sound** 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:

- Total petroleum hydrocarbons in the gasoline range (TPH-G), benzene, toluene, ethylbenzene and xylenes (BTEX) into the 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 from contribution claims by third parties for matters addressed by the opinion. The state does



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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 actions:

1. AECOM, 2016. *Letter Report, Groundwater Monitoring Results, Former Group Health DSSF, 801 SW 16th Street, Renton, Washington.* October 25.
2. AECOM, 2015. *Groundwater Sampling and Analysis Plan, Former Group Health DSSF, 801 SW 16th Street, Renton, Washington.* March 10.
3. URS, 2010. *Limited Soil Investigation Report, Former Group Health DSSF, TCP ID# NW1770, 801 SW 16th Street, Renton, Washington.* June 22.
4. URS, 2009. *Letter Report Groundwater Monitoring Results, Former Group Health DSSF, TCP #1770, 801 SW 16th Street, Renton, Washington.* January 27.
5. URS, 2006. *Request for Modification to Restrictive Covenant, Former Group Health Cooperative DSSF, Renton, Washington.* July 5.
6. ATC Environmental, 1998. *Water Quality Results for Groundwater Sampling Events – December 1996 and July and October, 1977, Distribution and Support Services Facility, Renton, Washington.* March 2.
7. ATC Environmental, 1996. *Independent Remedial Action Report, Distribution and Support Services Facility, 801 S.W. 16th Street, Renton, Washington.* June 4.
8. Pickering Environmental Consultants, Inc., 1992. *Corrective Action Plan for Group Health Cooperative DSSF, 801 S.W. 16th Street, Renton, Washington 98055.* September.
9. Pickering Environmental Consultants, Inc., 1992. *Phase Two Environmental Site Assessment of Group Health Cooperative DSSF, 801 S.W. 16th Street, Renton, Washington 98055.* April.
10. Pickering Environmental Consultants, Inc., 1992. *Site Assessment UST Decommissioning, Group Health Cooperative Distribution and Support Services Facility, 801 S.W. 16th Street, Renton, Washington 98055.* January 3.

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) 649-7235 or sending an email to nwro_public_request@ecy.wa.gov.

The Site is defined by the extent of contamination caused by the following releases:

- TPH-G), benzene, toluene, ethylbenzene and xylenes (BTEX) into the Soil and Ground Water

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 releases at the Site, Ecology has determined:**

- Ecology agrees that the current monitoring well network (MW-10, MW-13, MW-27 and GWE-1) is representative of current Site conditions.
- Recalcitrant benzene concentrations in MW-13 still occur intermittently just above the MTCA Method A cleanup level and are coincident with detections of TPH-G that are well below Method A. These detections are most likely due to a residual source upgradient of MW-13.
- An apparent isolated detection in MW-10 of cis-1,2-dichloroethene at a concentration of 2.49 micrograms per liter ($\mu\text{g/L}$) is below the Method B non-carcinogenic cleanup level of 16 $\mu\text{g/L}$.
- Ecology requires current data and a minimum of four consecutive quarters of ground water sampling data below MTCA cleanup levels in order for the Site to be considered for a No Further Action determination.

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

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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 by phone at (425) 649-7064 or by email at heather.vick@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink that reads "Heather Vick". The signature is written in a cursive, flowing style.

Heather Vick, LHg
NWRO Toxics Cleanup Program

cc: Anthony Palmieri, AECOM
Sonia Fernandez, VCP Coordinator, Ecology