



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 28, 2017

Mr. Mark Jenkins
Kite Realty Group
30 South Meridian St Ste 1100
Indianapolis IN 46204

Re: No Further Action at the following Site:

- **Name:** Four Corners Cleaners New Location
- **Address:** 23886 Kent-Kangley Road, Maple Valley, WA
- **Facility/Site No.:** 5867
- **Cleanup Site ID No.:** 12513
- **VCP No.:** NW2932

Dear Mr. Jenkins:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Four Corners Cleaners New Location 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 Addendum to 2012 Additional Subsurface Investigation Report dated February 26, 2014 and Response to Ecology Comments Dated June 22, 2015. The reports document the remedial activities that have addressed contamination in soil at the Site due to operations of the former dry cleaning facility.

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:

- Perchloroethylene (PCE) and Trichloroethene (TCE) into Soil.

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

Enclosure B includes diagrams of the Four Corners Cleaners New Location Site.

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. The Riley Group, Inc., June 22, 2015, Response to Ecology Comments dated April 2, 2015.
2. The Riley Group, Inc., February 26, 2014, Addendum to 2012 Additional Subsurface Investigation Report.
3. The Riley Group, Inc., September 28, 2012, Additional Subsurface Investigation Report.
4. The Riley Group, Inc., May 9, 2012, Phase I Environmental Site Assessment Update Report.
5. The Riley Group, Inc., January 18, 2011, Phase I Environmental Site Assessment Update Report.
6. The Riley Group, Inc., January 3, 2011, Drycleaners Compliance Review Report.
7. The Riley Group, Inc., December 7, 2004, Supplemental Phase II Subsurface Investigation.
8. The Riley Group, Inc., September 30, 2003, Phase I Environmental Site Assessment.

Those documents listed above 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 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 that your characterization of the Site is sufficient to establish cleanup standards, and select cleanup actions for removal of the contaminated soil exceeding MTCA Method A cleanup levels and confirmation of the groundwater quality.

- a. Site assessments conducted at this Site from 2003 to 2014 confirmed the presence of chemicals of concern (COCs) as aforementioned in soil vapor. The studies also concluded that the contamination resulted from operations of the former dry cleaning facility on the Property, Four Corners Cleaners.
- b. While a total of 16 soil samples were collected from the soil borings at a range of 0.1 to 30 feet below the ground surface (bgs), three ground water samples were obtained from the soil borings where ground water was encountered between 21 to 23 feet bgs. The laboratory results indicated none of the analytes (gasoline, diesel, heavy oil, PCE, TCE, 1,2-dichloroethylene and vinyl chloride) were found in Site soil or ground water.
- c. Soil vapor measurements were conducted during the Site characterization in 2004. PCE and TCE were the only chlorinated compounds detected and occurred at concentrations in the soil vapor at 1,000 and 11 $\mu\text{g}/\text{m}^3$ respectively. RGI utilized the Environmental Protection Agency (EPA) online Johnson and Ettinger Model (JEM) to calculate property-specific soil vapor screening levels for PCE and TCE. The calculated Site-specific soil vapor screening levels were 2,755 $\mu\text{g}/\text{m}^3$ for PCE and 103 $\mu\text{g}/\text{m}^3$ for TCE. Therefore, there is no soil vapor intrusion risk at this Site since the field measurements were detected at 1,000 and 11 $\mu\text{g}/\text{m}^3$ for PCE and TCE, respectively.

2. Establishment of cleanup standards.

a. Substance-specific standards.

Ecology has determined the cleanup levels and 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.

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

Cleanup level for soil vapor at this Site is defined as the MTCA Method B calculated site-specific concentration screening levels.

b. Action and location-specific requirements.

The requirement to clean up this Site includes reducing concentrations of soil vapor to the MTCA Method B calculated site-specific concentration screening level.

3. Selection of cleanup action.

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

- a. Investigations conducted to characterize the Site indicated the exceedance was not found in soil and ground water.
- b. The soil vapor study concluded that vapor intrusion is not of concern at this Site because measured soil vapor concentrations of PCE and TCE are below MTCA Method B calculated Site-specific concentration screening levels (JEM Model) of 2,755 and 103 $\mu\text{g}/\text{m}^3$, respectively.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site at MTCA Method A cleanup levels for the COCs aforementioned. This determination is based on the performances specified below.

- a. PCE and TCE detected in soil vapor were below MTCA Method B calculated site-specific concentration screening levels.
- b. Laboratory results demonstrated the COCs in soil and ground water were at concentrations below the detectable levels.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists 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).

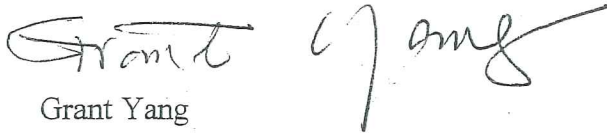
Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project #NW2931.

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.

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February 28, 2017
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Sincerely,



Grant Yang

Toxics Cleanup Program

Enclosures (2) A - Site Description
B - Site Diagrams

cc: Jerry Sawetz, The Riley Group, Inc.
Sonia Fernandez, VCP Coordinator, Ecology
Matt Alexander, VCP Financial Manager, Ecology

Enclosure A:

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 23886 Kent-Kangley Road in Maple Valley, Washington (Property) (see Figure 1) and consists of PCE and TCE in soil vapor.

Area and Property Description: The Property is located in a mixed commercial and residential area with a size of less than 5,000 square feet (Figure 2).

Property History and Current Use: The Site was historically occupied by a dry cleaning facility, Four Corners Cleaners, which operated from 1984 to 2000. The Site was redeveloped as a parking lot for a newly constructed Walgreens at the same time as the Site assessment was performed in 2014.

Source of Contamination: Based on the Site assessment results, the presence of PCE and a related degradation product, TCE, were confirmed in soil vapor at this Site. Impacts of these contaminants to the surface and subsurface soils occurred over time through releases from operations of the former dry cleaning facility. Once in the soil, PCE and TCE volatilized and migrated into the soil vapor.

Physiographic Setting: The Site is located on the Des Moines drift upland at an elevation of approximately 500 feet above mean sea level. The Site is relatively level, with a slight gradient toward the north.

Surface/Storm Water System: The closest surface water body to the Site is Rock Creek, which is approximately 2,000 feet to the east. Surface water and storm water runoff on and in the vicinity of the Site disperses via sheet flow to the city of Maple Valley's storm water drainage system.

Ecological Setting: There is no terrestrial habitat within 1,000 feet of any part of the Site, which is surrounded by the developed land occupied by residential and commercial buildings, roads, paved areas and other barriers. Therefore, the environment prevents wildlife from feeding on plants, earthworms, insects, or other food in or on the soil.

Geology: The Site and vicinity are primarily underlain by the Vashon till, a dense unconsolidated glacial deposit characterized by poorly-sorted materials including gravel, sand, silt and clay. A thin veneer of Vashon recessional outwash deposits is also present, as recorded in well logs to depths of at least 20 feet below the ground surface (bgs) overlying the till at this Site.

Ground Water: A perched shallow ground water-bearing zone was encountered at depths of approximately 21 to 23 feet bgs at the Site. Based on the formation of ground water encountered in soil borings and monitoring wells, the ground water flow direction is generally north.

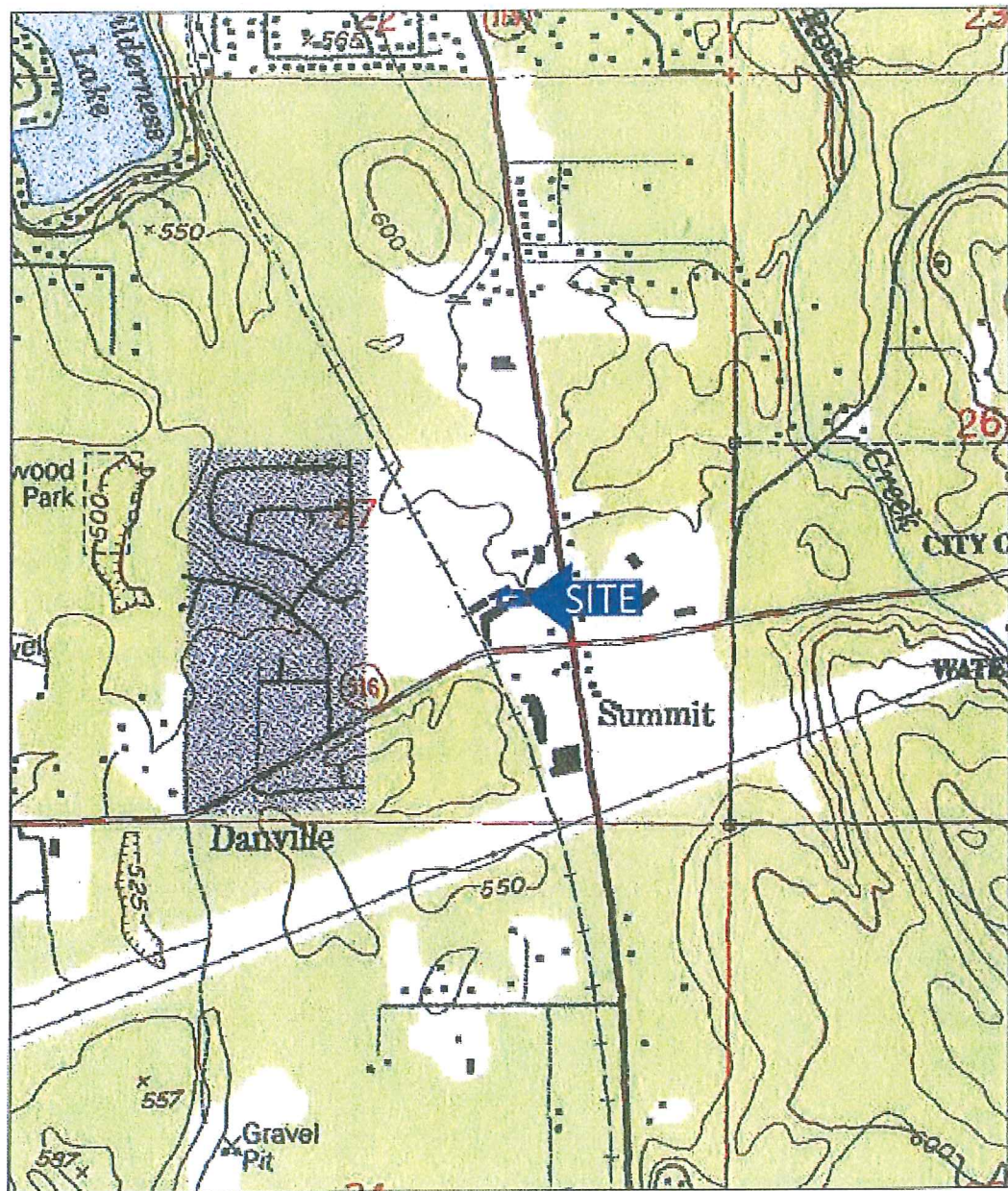
Water Supply: A public water supply system is currently provided to the Site by the Covington Water District which obtains water from the Lake Sawyer wellfield in Black Diamond. According to Ecology's well log data base, there are no private drinking water wells located within approximately 1,000 feet of the Property.

Releases and Extent of Soil Contamination: Soil was contaminated due to releases from operations of the former dry cleaning facility from 1984 to 2000. From 1989 to 2014, various investigative were conducted at the Site, which included characterization of the Site contamination in soil and performance of a soil vapor study. Based on the conclusions obtained from these remedial investigations, soil was not found to be exceeded with PCE and TCE above MTCA Cleanup levels.

PCE and TCE were detected in soil during the site assessment at levels of 1,000 and 11 $\mu\text{g}/\text{m}^3$. In accordance with the calculations used Ecology's MTCA Method B and EPA's JEM, the Site-specific screening levels for PCE and TCE are 1,680 and 65 $\mu\text{g}/\text{m}^3$; and 2,755 and 103 $\mu\text{g}/\text{m}^3$, respectively. The soil vapor study indicated that there is no a vapor intrusion pathway on the Site since the detected levels were below the Site-specific screening levels. Therefore, Ecology determines the cleanup at this Site is complete.


Releases and Extent of Ground Water Contamination: Ground water samples collected at 21 to 23 feet bgs from three monitoring wells were analyzed for the COCs at the Site. The laboratory results indicated that the concentrations of COCs in the ground water were at undetectable levels.

Enclosure B: Figure 1 Location of the Site



USGS, 1994, Black Diamond, Washington
7.5-Minute Quadrangle

Approximate Scale: 1"=1000'
0 500 1000 2000 N

	Corporate Office		Former 4 Corners Cleaners		Figure 1	
	17522 Bothell Way Northeast		RGI Project Number		Date Drawn:	
	Bothell, Washington 98011		2003-165L		08/2014	
	Phone: 425.415.0551		Address: 23886 Southeast Kent-Kangley Road, Maple Valley, Washington 98038			
	Fax: 425.435.0311					

