



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 12, 2017

Mr. Robert Suss
Sumner National Auto Parts
3117 SW 342nd
Federal Way, WA 98023

Re: Further Action at the following Site:

- **Site Name:** Sumner National Auto Parts
- **Site Address:** 16008 60th Street East, Sumner, Pierce County, WA 98390
- **Facility/Site No.:** 1304
- **Cleanup Site No.:** 3653
- **VCP Project No.:** SW1547

Dear Mr. Suss:

The Washington State Department of Ecology (Ecology) received your request for an opinion regarding a proposed remedial action as part of your independent cleanup of Sumner National Auto Parts (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

Ecology has determined that further remedial action is necessary to clean up contamination at the Site.

This opinion is 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. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below. **Enclosure A** includes pertinent figures from the work plan for the Site, as currently known to Ecology (Figures 1 through 4).

Mr. Robert Suss
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Page 2

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

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

1. Email correspondence from Mr. Tim Mullin, Ecology, to Mr. Jonathan Kemp, Environmental Corporation (EnCo), dated June 27, 2017.
2. EnCo, *Independent Remedial Cleanup Action Work Plan*, dated May 23, 2017.
3. Ecology, RE: State Environmental Policy Act Comments, dated April 3, 2017.
4. Email correspondence from Mr. Tim Mullin, Ecology, to Mr. Jonathan Kemp, EnCo, dated January 27, 2017.

The above documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at (360) 407-6365.

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 **further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

This opinion letter provides comments Enco's *Independent Remedial Cleanup Action Work Plan*, dated May 23, 2017. Excavation of contaminated soils and installation of six additional monitoring wells is proposed. A Site description and selected figures (1-4) are included in **Enclosure A**.

Comments:

1. Overall, Ecology concurs with the remedial action proposed and the feasibility study. The goals of the remedial action are to delineate the extent of contamination, characterize the Site, and to achieve cleanup levels at the Site for Site COCs via excavation.

Ecology concurs that excavation is the remedial action with the highest probability of contamination removal and meeting the proposed MTCA Method A and Method B cleanup levels. Standard points of compliance for achieving those cleanup levels in soil and groundwater are anticipated to be used for the Site.

2. Field work for the proposed excavation and well installation was authorized via email from Ecology to EnCo on June 27, 2017. That communication is included in **Enclosure B**. Ecology concurred with the work plan and provided selected comments in advance of this opinion letter because the work is time sensitive. In order to avoid a potentially high groundwater table, excavation work must occur between July and September. In Ecology's estimate, the opinion letter would not be submitted until potentially too late to accommodate this window of opportunity, and thus provided the advance email notification to proceed after initial review of the *Independent Remedial Cleanup Action Work Plan*.
3. Ecology concurs that implementation of the remedial action outlined in the work plan likely will result in areal and vertical delineation of Site soils per WAC 173-340-350(7)(c)(iii)(B), and provides acceptable contingencies in case contamination is more widely distributed than anticipated. Ecology concurs with the work plan contingencies in that additional soil may require removal and off-Property disposal depending on the laboratory analytical results. Ecology encourages the removal of soil as dictated by the laboratory results in order to cleanup Site contamination. Specifically, it is recommended to await analytical results and excavate any exceedances of MTCA Method A or Method B cleanup levels in soil encountered prior to backfilling the excavation or redistributing the gravel stockpile.
4. Where field screening or visual observations indicate contaminated soils, ethylene glycol (antifreeze) should be added to the Site contaminants of concern (COC) list.
 - a. Sample for ethylene glycol where staining of Site soils indicate a potential release of antifreeze and/or where sampling of Site soils are sampled for total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). Ethylene glycol has a MTCA Method B cleanup value in soil for unrestricted land use of 160,000 milligrams per kilogram.
 - b. Ecology recommends sampling soil stockpiles as needed for ethylene glycol as well.
 - c. Groundwater should also be sampled for ethylene glycol. The MTCA Method B cleanup value for ethylene glycol in groundwater is 16,000 µg/L.

5. In order to maximize excavation efficiency, avoid a potentially high water table, and minimize the risk of cross-contamination of contaminated soils coming into contact with high groundwater, Ecology agrees with the decision to complete the excavation at the anticipated seasonal minimum at the Site for groundwater (July through September).
6. It appears that additional information requested by Ecology via email correspondence dated January 27, 2017 has been incorporated into the work plan. A copy of this correspondence is included in **Enclosure B**.
7. Ecology concurs with landfill disposal of contaminated Site soils at an approved facility.
8. Ecology concurs with sampling of gravels for selected COCs in order to verify that the gravel stockpile is not contaminated. These gravels were placed on the east side of the Property sometime between 2002 and 2015, after cleanup had started. If the gravel stockpile is determined to be contaminated, it should be disposed of at an approved facility.
9. Where field screening or visual observations indicate contamination is likely to be present outside of Area 9, soil sampling may need to be adjusted to a broader scope of COCs (e.g., similar to the list proposed for Area 9). If there is any question whether or not additional analytical results should be obtained at a given sample location, Ecology recommends collecting the additional data. If analytical data indicates that there may be uncertainty regarding whether or not a soil stockpile should be disposed of off-Property at an approved facility, Ecology suggests disposal of the soil stockpile at the off-Property facility.
10. Ecology notes that the appropriate local permitting applicable to the remedial action and evaluation under the State Environmental Policy Act (SEPA) appears to have been completed. Ecology provided SEPA comments to the City of Sumner in a letter dated April 3, 2017.
11. Site topography is relatively flat. Local topography gently decreases to the north and northwest, towards the nearest surface water body, Salmon Creek, which is located approximately 2,200 feet to the north. Ecology concurs with the monitoring well network as proposed, though Ecology understands field conditions or utility conflicts may cause the final well locations to be adjusted. However, should analytical results or groundwater flow direction indicate additional monitoring wells are necessary, delineate the Site per WAC 173-340-350(7)(c)(iii).
12. In October 2015 groundwater was reported at approximately 5 feet below top of casing.

Ecology concurs with the proposed installation of six additional monitoring wells. Field observations may require longer monitoring well screens than proposed. Screen lengths should be set in order to produce sufficient water volume for sampling from each well and should ideally extend slightly above the maximum water table. All monitoring wells should be properly developed. Ecology recommends using low flow groundwater sampling methodology to sample all Site monitoring wells.

13. After monitoring well installation, Ecology recommends waiting at least two weeks before sampling the monitoring wells in order to ensure a representative sample. The reasons for this is because metals are Site COCs and results may be influenced immediately after drilling by suspended particles in water within the monitoring well.
14. For metals in groundwater, Ecology recommends sampling for both total and dissolved metals.
15. On page 8 of the *Independent Remedial Cleanup Action Work Plan*, item 15, "(MW-1 to MW-6)" should be "(MW-2 to MW-7)" as monitoring well MW-1 has already been installed at the Site.
16. Where investigation derived waste is generated associated with the proposed monitoring well installation, Ecology recommends that these soils and any purge or decontamination water be disposed of off-Site at an approved facility.
17. There are good discussions of the exposure pathways in the *Independent Remedial Cleanup Action Work Plan*. In a post-cleanup comprehensive report for the Site, review and discuss each pathway. It appears the ecological pathway remains to be considered. For the comprehensive report, please ensure they are submitted under the seal of an appropriately licensed professional, as required by Chapters 18.43 and 18.220 RCW.
18. A terrestrial ecology evaluation (TEE) must be performed as part of this cleanup. Please fill out the form on Ecology's website and submit it to us (along with any supporting documentation, as appropriate) for review. The form can be found at:
<https://fortress.wa.gov/ecy/publications/summarypages/ecy090300.html>
19. For reference, here are links to Ecology's remedial investigation (RI), feasibility study (FS), cleanup action plan (CAP) checklists. Final reports are encouraged to use these checklists to guide report format.
 - a. RI: <https://fortress.wa.gov/ecy/publications/SummaryPages/1609006.html>
 - b. FS: <https://fortress.wa.gov/ecy/publications/SummaryPages/1609007.html>
 - c. CAP: <https://fortress.wa.gov/ecy/publications/SummaryPages/1609008.html>

20. In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Remedial Actions shall be submitted simultaneously in both a written and electronic format. For additional information regarding electronic format requirements, see the website <http://www.ecy.wa.gov/eim>. Be advised that according to the policy, any reports containing sampling data that are submitted for Ecology review are considered incomplete until the electronic data has been entered. Please ensure that data generated during on-site activities is submitted pursuant to this policy. **Data must be submitted to Ecology in this format for Ecology to issue a No Further Action determination; in addition this data be submitted concurrently with submittal of the environmental report¹.** Please be sure to submit all soil and groundwater data collected to date, as well as any future data, in this format. Be advised that Ecology requires up to four weeks to process the data once they are received.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liabe 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. Robert Suss
July 12, 2017
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Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

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, please contact me by phone at 360-407-6265 or e-mail at Tim.Mullin@ecy.wa.gov.

Sincerely,



Tim Mullin, LG
SWRO Toxics Cleanup Program

TCM: kb

By Certified Mail: [91 7199 9991 7037 0291 6418]

Enclosures (2): A – Site Description and Selected Site Figures
 B – Email Correspondence

cc: Jonathan Kemp, LG, EnCo Environmental Corp.
 Nick Acklam, Ecology
 Matt Alexander, Ecology

Enclosure A

Site Description and Selected Site Figures

- 1) Figure 1: Vicinity
- 2) Figure 2: Parcel & Aerial
- 3) Figure 3: Soil and Groundwater Test Results – Before Clean Up
- 4) Figure 4: Excavation Footprints & Temporary Soil Stockpile Proposed During Clean Up

Site Description

Site and Property:

The Site is located on the parcel located at 16008 60th Street East, Sumner, Pierce County, Washington. According to the Pierce County Assessor-Treasurer's website, the Site is associated with parcel 0520198006, which totals 1.58 acres in size (Property). The Property is zoned commercial. Past Property use was for rebuilding automobile engines and metal machining within the current Property building. No engine rebuilding or metal machining activities currently take place at the Property.

Property History and Current Use:

The Property is occupied by a retail automobile parts supply and sales company in a single building. The 7,500 square foot metal roof and metal frame building was constructed in 1979. A machine shop used to occupy the southern 4,500 square feet of the building, which is used for automobile parts storage today. A lean to consisting of an awning and a concrete slab used to be attached to the east side of the center portion of the building. These features were removed sometime in the mid 1990's.

Property Vicinity:

The Property is in an area of mixed residential, commercial, and agricultural properties.

Geology/Soils:

Site soils observed to date are fill covering predominantly sand with some silts and gravels.

Groundwater:

Currently, one groundwater monitoring well (MW-1) is present at the Site. Installed in October 2015, groundwater was measured at approximately 5 feet bgs. MW-1 was placed in the source area of contamination at the Site.

Surface/Storm Water/Septic Systems:

On-Property, a low area east of the building reportedly collected water into a pool up to 20 feet by 40 feet in size. Salmon Creek, located approximately 2,200 feet north and of the Site is the

nearest surface water. The Puyallup River is located approximately 5,100 southwest of the Site. It is unknown if a storm water system is present at the Site. The building at the Property is connected to public water and sewer. No septic system is present.

Source of Contamination & Contamination Extent:

According to EnCo's Independent Remedial Cleanup Action Work Plan, the releases were related to periodic dumping of hot caustic wash water in the soils east of the former lean-to. The former lean-to consisted of an awning over a small concrete pad (16 feet long by 18.5 feet wide) where some fluid storage and engine cleaning occurred. Automobile engines were also reportedly spray cleaned on bare soil to the east of the concrete slab. In response to anonymous complaints, Ecology identified these releases in an inspection on February 7, 1991. It is not known how long the improper disposal activities occurred at the Property; however, the current building and engine rebuild operation is believed to have started in 1979.



Project Site

Independent Remedial Action Work Plan
 Map Source: Pierce County GIS
 1" = ~ 493' for a 8.5" x 11.0" Sheet



VICINITY

Summer National Auto Parts, Inc.
 16008 60th Street East, Sumner, Pierce County WA 98390

FIGURE 1



POB 1212
 Puyallup WA 98371
 Tel: 253-841-9710
 www.encoec.com



Sumner National Auto Parts

Independent Remedial Action Work Plan
Parcel Number: 0520198006
Acres: 1.58
Map Source: Pierce County GIS
Scale: 1" = ~121' for a 8.5" x 11.0" Sheet



PARCEL & AERIAL

FIGURE 2

Sumner National Auto Parts, Inc.
16008 60th Street East, Sumner, Pierce County WA 98390



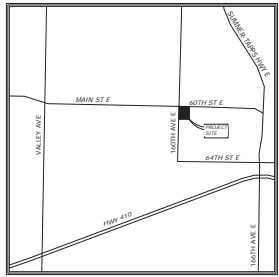
POB 1212
Puyallup WA 98371
Tele: 253.841.9710
www.encoec.com

Figure 3

A PORTION OF SWQ OF SEQ OF SECTION 19, TOWNSHIP 20 N., RANGE 05 E., W.M.

SUMNER NATIONAL AUTO PARTS STORE

16008 60TH ST E SOIL AND GROUNDWATER TEST RESULTS - BEFORE CLEAN UP



VICINITY MAP
N.T.S.

1991 & 2002 SAMPLE DATA

TEST NO.	SAMPLE NO. (DEPTH BCS)	SAMPLE DATA
1	77474	HD-45360
2	77475	AS-363, CD-184, CR-2340, PB-323
3	77476	HO-5420, AS-57, CD-12.5, PB-4040
4	77477	HO-19290
5	77478	pH: 10.97, BE-ND, TO-ND, XY-4.9
6	77479	BE-ND, TO-T-6, XY-ND
7	1	1A (.83) HO-ND, PB-ND 1B (1.25) HO-ND
8	2	2A (.5) HO-ND, PB-120 2B (.83) HO-ND, PB-12 2C (1.33) HO-ND, PB-125 2D (2) HO-ND 2E (2.67) HO-ND
9	3	3A (1) HO-ND 3B (1.5) HO-ND
10	4	4A (1) HO-ND
11	5	5A (1) HO-ND
12	6	6A (1.5) HO-ND
13	7	7A (1.7) HO-1700, CD-1.9, PB-910
14	8	8A (.17) HO-ND, CD-1.2, PB-520
15	9	9A (.17) HO-ND, PB-220
16	10	10A (.17) HO-1700, CD-1.3, PB-540
17	11	11A (.17) HO-ND, PB-220
18	12	12A (.17) HO-ND, PB-460 12B (1.5) HO-ND
19	13	13A (.17) HO-ND, CD-1.9, PB-700
20	14	14A (.17) HO-ND, CD-1.5, PB-320
21	15	15A (.25) HO-ND, PB-110 15B (.75) HO-ND, PB-160
22	16	16A (.25) HO-290, PB-130 16B (.75) HO-ND, PB-330
23	17	17A (.25) HO-ND, PB-220 17B (.75) HO-ND, PB-8
24	18	18A (.25) HO-ND, PB-45 18B (1) HO-ND, PB-47
25	19	19A (.33) HO-ND, PB-370 19B (1) HO-ND, PB-760

2015 SAMPLE DATA

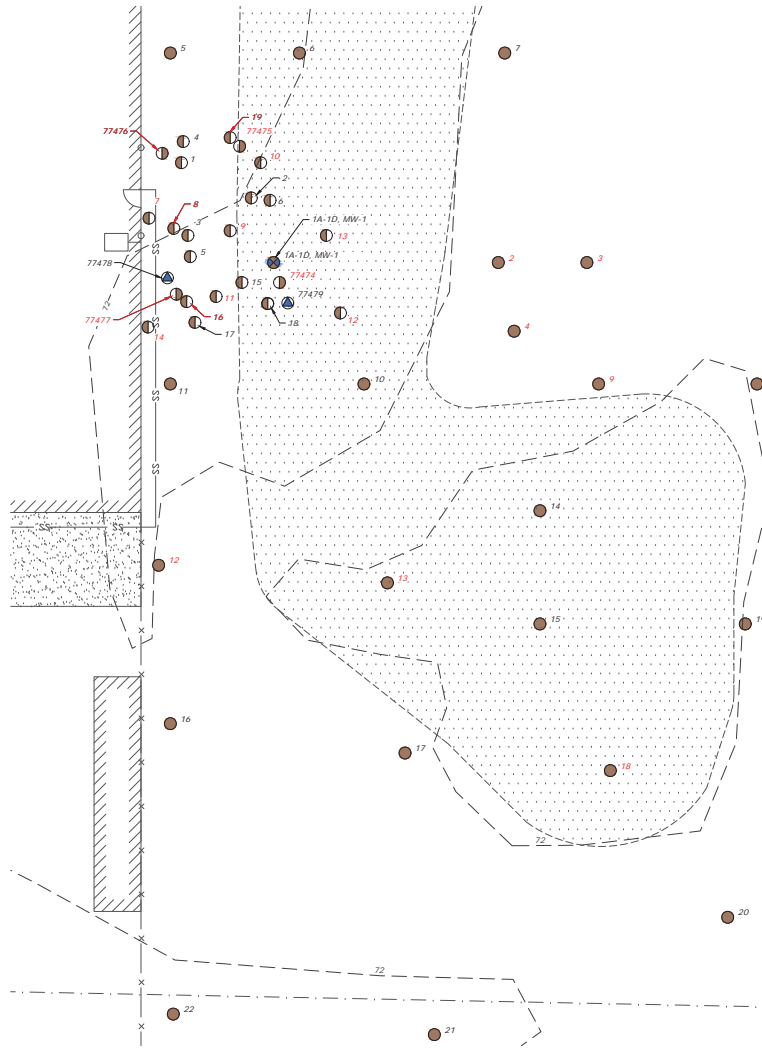
TEST NO.	SAMPLE NO. (DEPTH BCS)	SAMPLE DATA
1	1A (.75)	HO-ND, CD-ND, PB-105
2	1B (2)	HO-ND, CD-ND, PB-1.2
3	1C (5)	HO-ND, CD-ND, PB-1.13
4	1D (10)	CD-ND, PB-ND
5	2A (.5)	CD-ND, PB-172
6	3A (.5)	CD-ND, PB-225
7	4A (.5)	CD-3.5, PB-1970
8	5A (.5)	HO-ND, CD-ND, PB-113
9	6A (.5)	CD-ND, PB-33.6
10	7A (.5)	CD-ND, PB-27.4
11	8A (.9)	CD-ND, PB-6.65
12	9A (.5)	CD-10.8, PB-5140
13	10A (.7)	HO-950, CD-ND, PB-107
14	11A (.7)	HO-ND, CD-ND, PB-69.2
15	12A (.8)	CD-ND, PB-228
16	13A (.8)	CD-ND, PB-290
17	14A (.5)	CD-ND, PB-110
18	15A (1.0)	CD-ND, PB-25.8
19	16A (1.0)	HO-ND, CD-ND, PB-27.1
20	17A (1.0)	HO-ND, CD-ND, PB-117
21	18A (1.0)	HO-1500, CD-ND, PB-68.3
22	19A (.8)	CD-ND, PB-103
23	20A (.5)	CD-ND, PB-5.68
24	21A (.5)	CD-ND, PB-5.29
25	22A (.5)	CD-ND, PB-10.9

NOTES:
SURFACE WATER AND GROUND WATER SAMPLES DID NOT EXCEED MTCAs CULS FOR THE TESTED COCS.

TEST RESULTS PLOTTED IN RED TEXT IN THE SAMPLE DATA COLUMN EXCEEDED MTCAs METHOD CULS.

REFER TO TABLES 4A, 4B, 5, 6A, & 6B FOR THE MTCAs CULS FOR EACH PARAMETER.

NOT ALL PARAMETERS ARE LISTED IN THE DATA TABLE ON FIGURE 5; REFER TO TABLES 4A, 4B, 5, 6A, & 6B, THE LABORATORY REPORTS, AND THE CHAIN-OF-CUSTODY FORMS FOR A COMPLETE LISTING OF TESTED PARAMETERS.



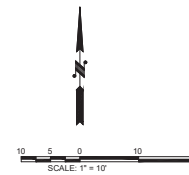
SOIL SAMPLE KEY

- 1991 SURFACE WATER SAMPLE - ECOLOGY
- 1991 SOIL SAMPLE - ECOLOGY
- 2002 SOIL SAMPLE - ENCO
- 2015 SOIL SAMPLE - ENCO
- 2015 SOIL & GROUND WATER SAMPLE - ENCO

NOTE: FOR SAMPLE COLLECTION DATA, REFER TO THE DATA TABLES IN THE REPORT

LEGEND

- AS - ARSENIC (TOTAL)
- BE - BENZENE
- BGS - BELOW GROUND SURFACE
- CD - CADMIUM (TOTAL)
- CR - CHROMIUM (TOTAL)
- HO - HEAVY OIL
- mg/kg - MILLIGRAM PER KILOGRAM
- ND - NOT DETECTED
- PB - LEAD (TOTAL)
- TO - TOLUENE
- XY - XYLENES (TOTAL)



SITE DATA

PARCEL NUMBER: 0520198006
 SITE ADDRESS: 16008 60TH ST E
 SITE AREA: 69,041 SF (1.58 AC)
 ZONING: GC (GENERAL COMMERCIAL)
 SETBACKS:
 FRONT: 5' MIN/25' MAX
 BACK: 20'
 INTERIOR: 5'

PROJECT INFO

CLIENT:
 ENCO ENVIRONMENTAL
 P.O. BOX 1212
 PUYALLUP, WA 98371
 TEL: 253-841-9710

ENGINEER:
 BEYLER CONSULTING
 7502 BRIDGEPORT WAY W, STE 30
 LAKEWOOD, WA 98499
 TEL: 253-301-4157

OWNER:
 SUMNER NATIONAL AUTO PARTS
 ROBERT S. SUSS
 16008 60TH ST E
 SUMNER, WA 98390

DATE		DESCRIPTION	
DATE		DESCRIPTION	
<p>WASHINGTON 16008 60TH ST E FIGURE 5</p>			
DRAWN BY:	SCALE:	CHECKED BY:	DATE:
CON	HORIZ: 1"=10'	VERT: 1/4"=10'	08/09/2016
<p>CITY OF SUMNER, WA</p>			
<p>SAMPLE DATA - BEFORE CLEAN UP</p>			
<p>16-243</p>			
<p>FIG. 5</p>			
<p>JOB NUMBER</p>			
<p>SHEET OF</p>			

LAKEMOORE OFFICE
 7602 Bridgeport Way W, Ste 30
 Puyallup, WA 98499
 Phone: 253-301-4157
 Fax: 253-301-4157
 BELLINGHAM OFFICE
 455 Palmer Drive NE
 Bellingham, WA 98205
 Phone: 425-992-9055
 Fax: 425-992-9108
 beylerconsulting.com

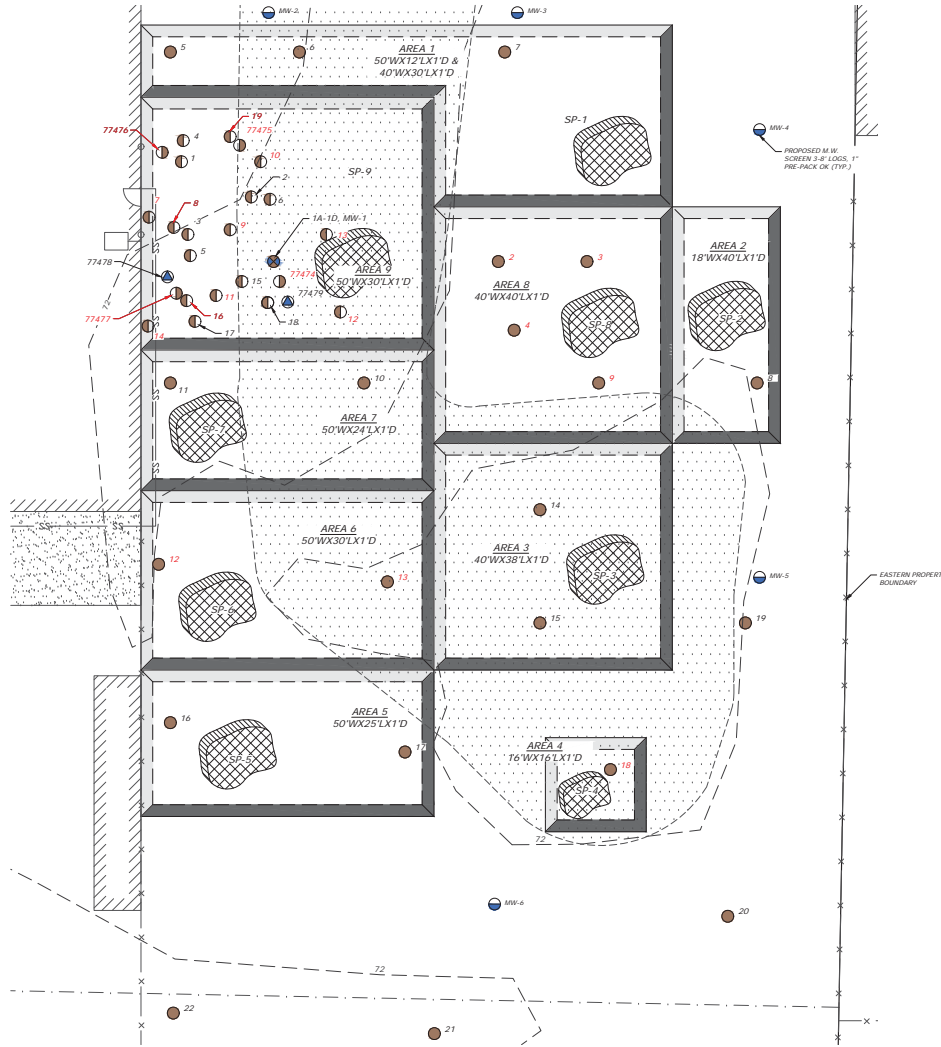
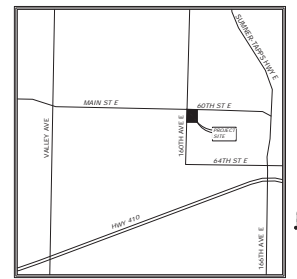
BEYLER CONSULTING
 Plan, Design, Manage
CONSULTANTS FOR THE CITY OF SUMNER

Figure 4

A PORTION OF SWQ OF SEQ OF SECTION 19, TOWNSHIP 20 N., RANGE 05 E., W.M.

SUMNER NATIONAL AUTO PARTS STORE

16008 60TH ST E EXCAVATION FOOTPRINTS & TEMPORARY SOIL STOCKPILE - PROPOSED DURING CLEAN UP



EXCAVATION & STOCKPILE KEY

- [Symbol] = FOOTPRINT OF EXCAVATION
- [Symbol] = TEMPORARY SOIL STOCKPILE

NOTE:
VISQUEEN WILL BE PLACED UNDER TEMPORARY SOIL STOCKPILES.

STOCKPILES WILL BE COVERED DAILY WITH VISQUEEN PLASTIC UNTIL REMOVED FROM THE SITE.

TEST RESULTS HIGHLIGHTED IN RED EXCEED OR ARE CLOSE TO MTOM CULS FOR THE COCS.

SOIL SAMPLE KEY

- [Symbol] 1991 SURFACE WATER SAMPLE - ECOLOGY
- [Symbol] 1991 SOIL SAMPLE - ECOLOGY
- [Symbol] 2002 SOIL SAMPLE - ENCO
- [Symbol] 2015 SOIL SAMPLE - ENCO
- [Symbol] 2015 SOIL & GROUND WATER SAMPLE - ENCO (MW-1)
- [Symbol] PROPOSED MONITORING WELL LOCATION

NOTE: FOR SAMPLE COLLECTION DATA, REFER TO THE DATA TABLES IN THE REPORT

SITE DATA

PARCEL NUMBER:	0520198006
SITE ADDRESS:	16008 60TH ST E
SITE AREA:	69,041 SF (1.58 AC)
ZONING:	GC (GENERAL COMMERCIAL)
SETBACKS:	
FRONT:	5' MIN/25' MAX
BACK:	20'
INTERIOR:	5'

PROJECT INFO

CLIENT: ENCO ENVIRONMENTAL P.O. BOX 1212 PUYALLUP, WA 98371 TEL: 253-841-9710	ENGINEER: BEYLER CONSULTING 7502 BRIDGEPORT WAY W, STE 10 LAKEWOOD, WA 98499 TEL: 253-301-4157
OWNER: SUMNER NATIONAL AUTO PARTS ROBERT S. SUSS 16008 60TH ST E SUMNER, WA 98390	

NO.	DESCRIPTION	DATE
 BEYLER CONSULTING Plan, Design, Manage CONSULTANTS <small>10000 1st Avenue, Fremont, WA 98151</small>		
EXCAVATION & STOCKPILES - DURING CLEAN UP 16008 60TH ST E FIGURE 6		WASHINGTON DATE: 01/26/2017 SCALE: 1" = 10' HORIZ. 1" = 10' VERT. 1" = 10'
CITY OF SUMNER, DRAWN BY: [Name] CHECKED BY: [Name] DATE: 01/26/2017		JOB NUMBER 16-243 SHEET OF FIG. 6

C:\D:\FILE_X\Projects\16-000\16-243_Sumner National Auto Parts - Jonathan Kemp\ENCO_Engineering_Drawing\16243_Site Plan_2016.07.21.dwg
 PLOT DATE/TIME: 1/26/2017 4:17pm

Enclosure B

Email Correspondence

From: Mullin, Tim (ECY)
To: ["Jonathan Kemp"](#)
Subject: RE: EnCo and Sumner National Parts Work Plan Update
Date: Tuesday, June 27, 2017 4:12:00 PM

Yes, please proceed following the work plan and addressing additional items presented in my email dated 6/27/17.

Of note, I do not anticipate any material changes to my comments based on review and finalization of the draft opinion. Additionally, I do not anticipate being present for any split sampling during the excavation (same as I indicated during the January 2017 Site visit).

Thank you,
Tim

From: Jonathan Kemp [mailto:jkemp@encoec.com]
Sent: Tuesday, June 27, 2017 4:08 PM
To: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Subject: RE: EnCo and Sumner National Parts Work Plan Update

Hi Tim:

Thanks for the update.

Just want to be sure: So we can proceed with the cleanup so long as we follow the Work Plan that you now have **along with addressing** the items presented by you in today's email?

Jonathan Kemp, Principal

EnCo Environmental Corporation

P.O. Box 1212

Puyallup WA 98371

Work: 253-841-9710

Email: jkemp@encoec.com



www.encoec.com

Think Green! Please do not print this e-mail unless it is completely necessary.

From: Mullin, Tim (ECY) [<mailto:TMUL461@ECY.WA.GOV>]
Sent: Tuesday, June 27, 2017 1:40 PM
To: Jonathan Kemp
Subject: RE: EnCo and Sumner National Parts Work Plan Update

Hi Jonathan:

I am finalizing an opinion for SW1547. Given Ecology's current review cycle timelines and the potential government shutdown, there is no way this opinion would be delivered in a timely fashion to be able to target July-September for the excavation. The need for the specific excavation time frame is to ensure groundwater is at the seasonal minimum and so the potential for infiltrating groundwater won't complicate the excavation.

Based on the need for implementing the work plan during the summer months, in general, Ecology concurs with the interim remedial action work plan and feasibility study. A lot of the field work is going to rely on field screening and the judgmental sampling in order to horizontally delineate soil contamination and confirm removal of soil contamination at depth. I think the work plan has sufficient contingencies to address potential unexpected pockets of contamination.

Here are some of my thoughts. I bolded what I consider critical items. This is not a complete list from the opinion letter, but should be sufficient to implement the work plan. Please take a look at these and let me know if you have any questions.

1. Overall, Ecology concurs with the interim remedial action proposed and the feasibility study. Ecology concurs that excavation is the cleanup strategy with the highest probability of contamination removal and meeting the MTCA Method A and Method B cleanup levels proposed. Standard points of compliance for achieving those cleanup levels in soil and groundwater are anticipated to be used for the Site.
2. Ecology has the following comments. These comments may slightly alter the final version of the workplan, but should not alter any field operations. Field work for the proposed excavation and well installation can proceed upon receipt of this opinion letter.
 - a. **Where field screening or visual observations indicate contaminated soils, ethylene glycol (antifreeze) should be added to the Site COC list.**
 - i. **Sample for ethylene glycol where staining of Site soils indicate a potential release of antifreeze and/or where sampling of Site soils are sampled for total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). Ethylene glycol has a MTCA Method B cleanup value in soil for unrestricted land use of 160,000 milligrams per kilogram.**
 - ii. **Ecology recommends sampling soil stockpiles as needed for ethylene glycol as well.**
 - iii. **Groundwater should also be sampled for ethylene glycol. The MTCA Method B cleanup value for ethylene glycol in groundwater is 16,000 µg/L.**
 - b. Ecology concurs with the work plan contingencies in that additional soil may require removal and off-Site disposal depending on the laboratory analytical results. Ecology encourages the removal of soil as dictated by the laboratory results in order to cleanup Site contamination.

- c. Ecology agrees with the decision to complete the excavation at the anticipated seasonal minimum at the Site for groundwater (July-September).
- d. It appears that additional information requested by Ecology via email correspondence dated January 27, 2017 has been incorporated into the work plan. A copy of this correspondence is included as Enclosure B.
- e. Ecology concurs with landfill disposal of contaminated Site soils.
- f. Ecology concurs with sampling of gravels placed on Site after cleanup at the Site had started for selected COCs in order to verify that the gravel stockpile is not contaminated.
- g. **Where field screening or visual observations indicate contamination is likely to be present outside of Area 9, soil sampling may need to be adjusted to a broader scope of COCs (e.g., similar to the list proposed for Area 9). If there is any question whether or not additional analytical results should be obtained at a given sample location, Ecology recommends collecting the additional data.**
- h. Ecology notes that the appropriate local permitting applicable to the interim remedial action and evaluation under the State Environmental Policy Act (SEPA) appears to have been completed.
- i. Ecology concurs that implementation of the remedial action outlined in the work plan will likely result in aeral and vertical delineation of Site soils per WAC 173-340-350(7)(iii)(C), and provide acceptable contingencies in case contamination is more widely distributed than anticipated.
- j. Site topography is relatively flat. Local topography gently decreases to the north and northwest, towards the nearest surface water body, Salmon Creek, located approximately 2,200 feet to the north. Ecology concurs with the monitoring well network as proposed. However, should analytical results or groundwater flow direction indicate additional monitoring wells are necessary, delineate the Site per WAC 173-340-350(7)(iii)(C).
- k. **After monitoring well installation, Ecology recommends waiting at least two weeks before sampling the monitoring wells in order to ensure a representative sample. The reasons for this is because metals are a Site contaminant of concern (COC) and results may be influenced by suspended particles in the water column within the well after drilling.**
 - i. **Ecology recommends using low flow groundwater sampling methodology.**
 - ii. **For metals in groundwater, Ecology recommends sampling for both total and dissolved metals.**

- l. Ecology understands that final monitoring well locations may be adjusted depending upon utility conflicts.

- m. Ecology concurs with the proposals for local surveying of soil sample locations and professional surveying of the monitoring well locations.

From: Jonathan Kemp [<mailto:jkemp@encoec.com>]
Sent: Tuesday, June 27, 2017 12:53 PM
To: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Subject: EnCo and Sumner National Parts Work Plan Update

Good Day Tim:

Update please on the Sumner National Auto Parts Work Plan review.

We are wanting to wrap up the Work Plan so that I can start getting my contractor scheduled in for July or August of this summer.

Jonathan Kemp, Principal

EnCo Environmental Corporation

P.O. Box 1212

Puyallup WA 98371

Work: 253-841-9710

Email: jkemp@encoec.com



www.encoec.com

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From: Mullin, Tim (ECY) [<mailto:TMUL461@ECY.WA.GOV>]
Sent: Friday, June 16, 2017 9:54 AM
To: Jonathan Kemp
Subject: RE: EnCo and Sumner National Parts

Hi Jonathan:

For SW1547 interim action work plan review, I currently plan to review the report and draft work plan comments towards the end of next week.

Thanks,
Tim

From: Jonathan Kemp [<mailto:jkemp@encoec.com>]
Sent: Friday, June 16, 2017 8:32 AM
To: tim.mullin@ecy.wa.gov
Subject: EnCo and Sumner National Parts

Hello Tim:

RE: Ecology VCP Work Plan Review
Independent Remedial Cleanup Action Work Plan
Sumner National Auto Parts
16008 60th Street East, Sumner WA 98390
Ecology VCP ID: SW1547
Ecology Cleanup Site ID: 3653
Ecology Facility/Site ID: 1304

Just checking in to see how you are proceeding with the review of the Work Plan for the above-referenced project.

Please give me an update on your review.

Thanks again Tim

Jonathan Kemp, Principal

EnCo Environmental Corporation
P.O. Box 1212

En

From: [Mullin, Tim \(ECY\)](#)
To: [Jonathan Kemp](#)
Subject: RE: EnCo and Sumner National Parts
Date: Friday, January 27, 2017 9:01:00 AM
Attachments: [SW1547 WP text.docx](#)
[SW1547 - metals.xlsx](#)

Hi Jonathan:

Please see attached for my recommendations regarding the COCs and work plan text for VCP Site #SW1547, 16008 60th Street East, Sumner, WA. I have provided my recommendations for the work plan text as well as the COC list for soil and groundwater.

My thinking is that there is useful historical soil data, but I think it is important to analyze soil and groundwater for historical analytes in order to demonstrate protection of human health and the environment at the excavation extent. COCs vary from area to area, and a lot will have to be determined by field screening.

Final COCs on a per monitoring well list cannot be completely known at this time, as much depends on the excavation results, and only one groundwater sampling event has been completed at the Site. Establishing final cleanup levels for the Site also are dependent upon the excavation results, though MTCA Method A or B cleanup levels are used to determine the extent of excavation.

I agree that groundwater sampling should start with the full COC list at MW-1, and then develop a target COC list for the other monitoring wells. Hopefully the October 2015 event results are consistent going forward. Though even non detect constituents at MW-1 should be sampled at the downgradient well as a point of compliance to show that these concentrations are not going offsite. Sampling of the downgradient well would not be required until after a determination of which is the Site downgradient monitoring well.

Other thoughts I have regarding the work plan:

- Did (or will) the City of Sumner require (or complete) a SEPA determination for the excavation as part of the grading permit?
- If the gravel apron is set aside prior to excavation, I recommend removing the shallowest estimate of emplaced thickness (~4"), and sampling the gravel pile for Site COCs in soil to demonstrate it is uncontaminated. However, if the gravel pile is incorporated into the stockpiles and sampling program shown on Figure 6, then no additional sampling is recommended.
- Based on the historical sampling data, I anticipate stockpiles for areas/cells 6, 7, 8, and 9, will require off-Site transport and disposal.
- The total cubic yards of excavation and disposal may exceed the original estimate, though it appears in the work plan this contingency is anticipated.
- The final monitoring well locations will be dependent upon excavation results, as well as resolution of infrastructural and utility conflicts.
- To the extent possible, I think it is important that the excavation report for the Site address

the RI/FS/CAP components of the cleanup process under MTCA, though this does not need to be addressed as part of the work plan.

Please give me a call if you have any questions.

Thank you,
Tim

Tim Mullin, LG
Voluntary Cleanup Program Site Manager
Southwest Region – Toxics Cleanup Program
Washington State Department of Ecology
300 Desmond Drive Southeast
Lacey, WA 98503
360-407-6265
Tim.Mullin@ecy.wa.gov

From: Mullin, Tim (ECY)
Sent: Wednesday, January 25, 2017 9:54 AM
To: 'Jonathan Kemp' <jkemp@encoec.com>
Subject: RE: EnCo and Sumner National Parts

Thanks for the below; I have the COC review scheduled for tomorrow, 1/26/17

From: Jonathan Kemp [<mailto:jkemp@encoec.com>]
Sent: Monday, January 23, 2017 2:12 PM
To: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Subject: RE: EnCo and Sumner National Parts

Hi Tim:

RE: Ecology VCP Work Plan Review
Sumner National Auto Parts
16008 60th Street East, Sumner WA 98390
Ecology VCP ID: SW1547
Ecology Cleanup Site ID: 3653
Ecology Facility/Site ID: 1304

Thanks for the update Tim.

I have incorporated the addition of 6 more groundwater monitoring wells into the forthcoming Work

Plan, at your request.

Regarding the Method B CULs for constituents that do not have Method A CULs:

Based on the 1991 Site Hazard Assessment rating I was able to find the following contaminants on the “*List of Substances to be considered for scaling*” on the Worksheet pages 1 through 6:

Arsenic
Barium
Chromium
Cadmium
Lead
PCE
Xylenes

Question 1: Could you please give me the **specific list of metals** that Ecology will require to be tested on selected soil and groundwater samples. I want to be sure we get this correct the first time.

Question 2: Listed below is my first attempt at presenting the COCs for the project site: Please review this paragraph and make needed changes or clarifications:

“The chemical or contaminant compounds or elements of concern listed below are collectively referred herein as the COCs. One or more of these COCs will be tested on the collected samples; depending on the test results obtained during the cleanup action. At a minimum, the full suite of the below-listed COCs will be analyzed on two (2) soil samples that report the highest concentrations of lead, cadmium, and petroleum hydrocarbons (project site indicators).

The full suite of the below-listed COCs for groundwater will be analyzed at **MW-1**. Based on the laboratory test result collected from **MW-1**, additional COCs may be added to the testing list for the other monitoring wells.

- Diesel range organics (DRO) as total petroleum hydrocarbons (soil & groundwater)
- Gasoline range organics (GRO) total petroleum hydrocarbons (soil & groundwater)
- Oil range organics (ORO) as total petroleum hydrocarbons (soil & groundwater)
- Volatile organic compounds (VOC) to include acetone, benzene, 2-butanone, carbon disulfide, ethylbenzene, methylene chloride, 4-methyl-2-pentanone, tetrachloroethene, toluene, EDB, EDC, MTBE, total xylenes, n-hexane, and other halogenated hydrocarbons (soil & groundwater)
- Polyaromatic hydrocarbons (carcinogenic) – (soil & groundwater)
- Naphthalenes (soil & groundwater)
- Polychlorinated biphenyls (PCBs) mixtures (total) (soil)
- **Total arsenic, barium, cadmium, tri-valent chromium, hexa-valent chromium, lead (soil & groundwater)**
- Dissolved (filtered) arsenic, barium, cadmium, tri-valent chromium, hexa-valent chromium, and

lead (groundwater)”

Jonathan Kemp, Principal

EnCo Environmental Corporation

From: Mullin, Tim (ECY) [<mailto:TMUL461@ECY.WA.GOV>]

Sent: Monday, January 23, 2017 7:49 AM

To: Jonathan Kemp

Subject: RE: EnCo and Well Map

Good morning Jonathan:

Please see the attached proposed approximate location sketch for the monitoring wells. The proposed monitoring well network presumes all soil contamination will be removed by excavation and that the results at MW-1 showing no exceedances of cleanup levels for groundwater continue. The monitoring well network also presumes that groundwater flow direction will be to the north, following topography and towards the nearest surface water. Exceedance of a cleanup level in groundwater at any monitoring well during future groundwater sampling may require delineation via installation of additional monitoring wells.

Monitoring wells are proposed to be installed outside the excavation perimeter after the excavation is complete. Based on the results of compliant groundwater monitoring thus far at MW-1, well construction can be similar to this one. However, if field conditions indicate that a given well location should be deeper than MW-1, have a 10 foot screen instead of a five foot screen, or be installed with a 2” (or greater) diameter casing, those options are available. Well installation should continue to be installed per WAC 173-160.

Regarding the Method B cleanup levels – these should be applied to any contaminant of concern which does not have a Method A cleanup level. Barium in soil is an example of where a Method B cleanup level should be used, but there are others (e.g., silver). Method B cleanup levels can be calculated under MTCA on a site-specific basis, however, standard assumptions can be made and the Method B cleanup levels from the CLARC database tables can be used. From my experience, I suggest using the most stringent Method B value from the CLARC database table instead of calculating a site-specific value, as the difference in values will frequently be negligible and using the database value is quicker and cheaper.

Here is a link to the CLARC database values:

<https://fortress.wa.gov/ecy/clarc/CLARCDATATables.aspx>

Thank you,

Tim

Tim Mullin, LG
Voluntary Cleanup Program Site Manager
Southwest Region – Toxics Cleanup Program
Washington State Department of Ecology
300 Desmond Drive Southeast
Lacey, WA 98503
360-407-6265
Tim.Mullin@ecy.wa.gov

From: Jonathan Kemp [<mailto:jkemp@encoec.com>]
Sent: Wednesday, January 18, 2017 9:28 PM
To: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Subject: EnCo and Well Map

Hi Tim:

**RE: Ecology VCP Work Plan Review
Sumner National Auto Parts
16008 60th Street East, Sumner WA 98390
Ecology VCP ID: SW1547
Ecology Cleanup Site ID: 3653
Ecology Facility/Site ID: 1304**

I have made all of the corrections, additions, updates to the Cleanup Action Plan that we talked about during your site visit on January 9, 2017. Once I get the following clarifications I will proceed to finish up the Cleanup Action Plan and get it to you for review.

1. Number of Monitoring Wells needed and the Approximate Location Sketch for the wells
2. Confirm that the MTCA Method "B" CULs will be used only for Barium.

Note: I am not too familiar with calculating the Method B CULs so if you could provide me with the CUL calculations needed for Barium in soil that would be a great help.

Jonathan Kemp, Principal

EnCo Environmental Corporation
P.O. Box 1212
Puyallup WA 98371
Work: 253-841-9710
Email: jkemp@encoec.com



www.encoec.com

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