



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
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October 6, 2017

Ms. Jennifer Sedlachek
ExxonMobil Environmental Services Company
4096 Piedmont Avenue, #194
Oakland, CA 94611

Re: Opinion Pursuant to WAC 173-340-515(5) on Ground Water Monitoring Reports for the following Hazardous Waste Site:

- **Name:** Mobil 99BLV
- **Address:** 1500/1510 145th Place SE, Bellevue, WA
- **Facility/Site No.:** 36214799
- **Cleanup Site ID No.:** 8876
- **VCP Project No.:** NW2892

Dear Ms. Sedlachek:

Thank you for submitting the Groundwater Monitoring Memorandum reports regarding your remedial actions at the Mobil 99BLV 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 the proposed plan pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following releases at the Site:

- Gasoline- and diesel-ranges of total petroleum hydrocarbons (TPH-G and TPH-D, respectively) and benzene, toluene, ethylbenzene, , xylenes (BTEX) in 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 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



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Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your remedial actions:

1. Cardno, June 29, 2017, Groundwater Monitoring Memorandum – 2nd Quarter 2017.
2. Cardno, March 6, 2017, Groundwater Monitoring Memorandum.

The ground water monitoring 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.

As indicated in an opinion letter dated November 13, 2015, Ecology determined that further sampling of ground water in monitoring well MW13B was needed since concentrations of the chemicals of concern (COCs) remain in exceedance of MTCA Method A cleanup levels. To comply with Ecology's recommendation, quarterly ground water monitoring efforts were initially performed in 2017. However, no ground water samples could be obtained due to insufficient ground water recharge in MW13B in both the first and second quarterly monitoring events.

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 the following requirements must be satisfied prior to releasing a No Further Action (NFA) letter for this Site:**

- Based on results of the Site characterization and ground water monitoring at the Site, the ground water table occurs at approximately 50 feet below ground surface (bgs). MW13B is a shallow monitoring well which is screened from 19 to 26 feet bgs. As a result, there was insufficient ground water available for adequate sample collection in the past two monitoring events.
- A deeper monitoring well with a well screen from 48 to 62 feet bgs should be installed at the location to replace MW13B. Ground water samples should be collected from the new well for analyzing the COCs.
- Ground water analytical results for the COCs must demonstrate concentrations below MTCA Method A cleanup levels for a minimum of four consecutive quarterly monitoring events.

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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.**

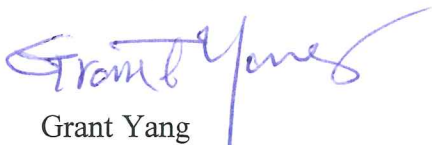
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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 a NFA under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-7126, or grantyang461@ecy.wa.gov.

Sincerely,



Grant Yang
VCP Site Manager
Toxics Cleanup Program, NWRO

cc: Michael Miller, Cardno
Sonia Fernandez, VCP Coordinator, Ecology