

William F. Joyce
Direct Dial: 206.957.5951
Email: wjoyce@jzplaw.com

Also Admitted in Oregon

September 20, 2016

VIA CERTIFIED MAIL

Darrell Rodgers
King County Environmental Health Services Division
Chinook Building
401 5th Avenue, Suite 1100
Seattle, Washington 98104

Re: 18825 SE Renton-Maple Valley Road, Renton, Washington
Notice of Independent Remedial Action pursuant to 173-340-545 WAC

Dear Darrell:

We represent Lakeside Industries, Inc. ("Lakeside") with respect to environmental issues on a parcel of property that Lakeside owns at 18825 SE Renton-Maple Valley Road, Renton, Washington (the "Site").¹ A map of the Site is attached to this letter as Enclosure 1. The Site comprises approximately 25.39 acres and was originally developed in the 1920s by Pacific Coast Coal Company to support coal mining operations in the region. In the 1940s, the Site was sold to King County, which used the Site for maintenance, woodworking, fueling, and other activities through the 1980s. Following King County's ownership, the Site reportedly was owned by various entities between the late 1980s and the late 1990s, when Goodnight Properties Inc. purchased the Site. Sunset Materials, which sells residential and commercial landscape materials, has occupied and operated the Site from that time until the present.

In early 2016, Lakeside engaged Farallon Consulting, LLC ("Farallon") to complete a Phase I Environmental Site Assessment ("Phase I") of the Site. According to information obtained during the Phase I, King County Shops, listed at the Site address, was identified in the CSCSL, LUST, and SPILLS databases. The Ecology online Integrated Site Information System identifies the Site as King County Shops, Cleanup Site ID: 9217 and FS ID: 6919.

According to information provided by the Washington State Department of Ecology ("Ecology"), two fuel underground storage tanks ("USTs"), three fuel pumps, a heating oil UST, and associated piping were removed from the Site by King County in 1997. Approximately 300

¹ King County parcel number 1923069026.

tons of impacted soil was excavated and removed by King County from the Site. According to documents reviewed during the Phase I provided by Ecology, impacted soil remains in localized areas of the Site. During the UST excavations performed by King County, sheen was observed in groundwater; however, the extent of groundwater impacts was not investigated. According to Ecology, the Site has confirmed petroleum in soil and groundwater at concentrations exceeding their respective regulatory cleanup levels ("CULs"). The Site is listed as awaiting cleanup under an independent cleanup action. Farallon found no records of closure reports or No Further Action determinations for the Site.

Based on the results of the Phase I, a subsurface investigation ("SI") was performed by Farallon to evaluate the potential presence of hazardous substances in soil and/or groundwater from historical and/or current operations on the Site. The SI was conducted at the Site from March through May 2016. The main elements of the SI included: locating subsurface utilities; advancing and sampling soil from 16 test pits; and installing and sampling soil and groundwater from seven monitoring wells. Included with this letter as Enclosure 2 is a Site Plan which shows the locations of the subsurface utilities and the sampling. Total petroleum hydrocarbons ("TPH") as diesel-range organics ("DRO"), TPH as oil range organics ("ORO"), and benzene were detected at concentrations exceeding Washington State Model Toxics Control Act ("MTCA") Chapter 70.105D of the Revised Code of Washington Method A CULs in soil at the Site during the investigation. These substances were identified as the constituents of potential concern ("COPCs") for the Site. The source(s) of the COPCs in soil are confirmed and suspected releases primarily related to historical King County operations at the Site.

Total and dissolved arsenic were detected at concentrations exceeding MTCA Method A CULs in groundwater samples collected from monitoring wells MW-2 and MW-6 on the central portion of the Site. The source of the anomalous detections of total and dissolved arsenic is likely related to a localized source in shallow soil. Groundwater samples collected from the remaining monitoring wells at the Site were reported non-detect at the laboratory practical quantitation limits for all COPCs, including monitoring wells MW-4 and MW-5 at the down-gradient, northern Site boundary. Based on these data, no further groundwater characterization is recommended at the Site.

The results of the SI indicate four localized areas of shallow petroleum hydrocarbon-contaminated soil at concentrations exceeding MTCA Method A CULs, including:

- A localized area of DRO-contaminated soil proximate to the northern side of the current diesel fuel storage building on the southwestern portion of the Site;
- A localized area of DRO-contaminated soil proximate to the former fuel pumps/maintenance shop area operated by King County on the west-central portion of the Site;
- A localized area of ORO-contaminated soil proximate to the former wash bay on the eastern portion of the Site; and

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- A localized area of benzene-contaminated soil proximate to test pit TP-15 on the southeastern portion of the Site.

This letter serves to notify you, in accordance with the requirements of MTCA and its implementing regulations, specifically Section 545 of 173-340 of the Washington Administrative Code ("WAC"), that Lakeside is currently preparing to conduct an independent remedial action at the Site to address the affected media to the maximum extent practicable in accordance with applicable requirements of MTCA. The independent remedial action at the Site will commence upon King County issuance of a grading permit and will be completed through the Ecology Voluntary Cleanup Program and performed in accordance with MTCA requirements for substantial equivalence as set forth in WAC 173-340-515, including providing Ecology with information on the Site and cleanup action, and obtaining confirmation from Ecology that the cleanup action is being performed in accordance with MTCA. Remedial activities also will meet the threshold requirements of WAC 173-340-360 to protect human health and the environment, comply with cleanup standards, and comply with applicable state and federal laws. Some or all of the costs for conducting the remedial action will be subject to a Private Right of Action in accordance with WAC 173-340-545.

Please contact our office if you have any questions or need additional information.

Very truly yours,

JOYCE ZIKER PARKINSON, PLLC

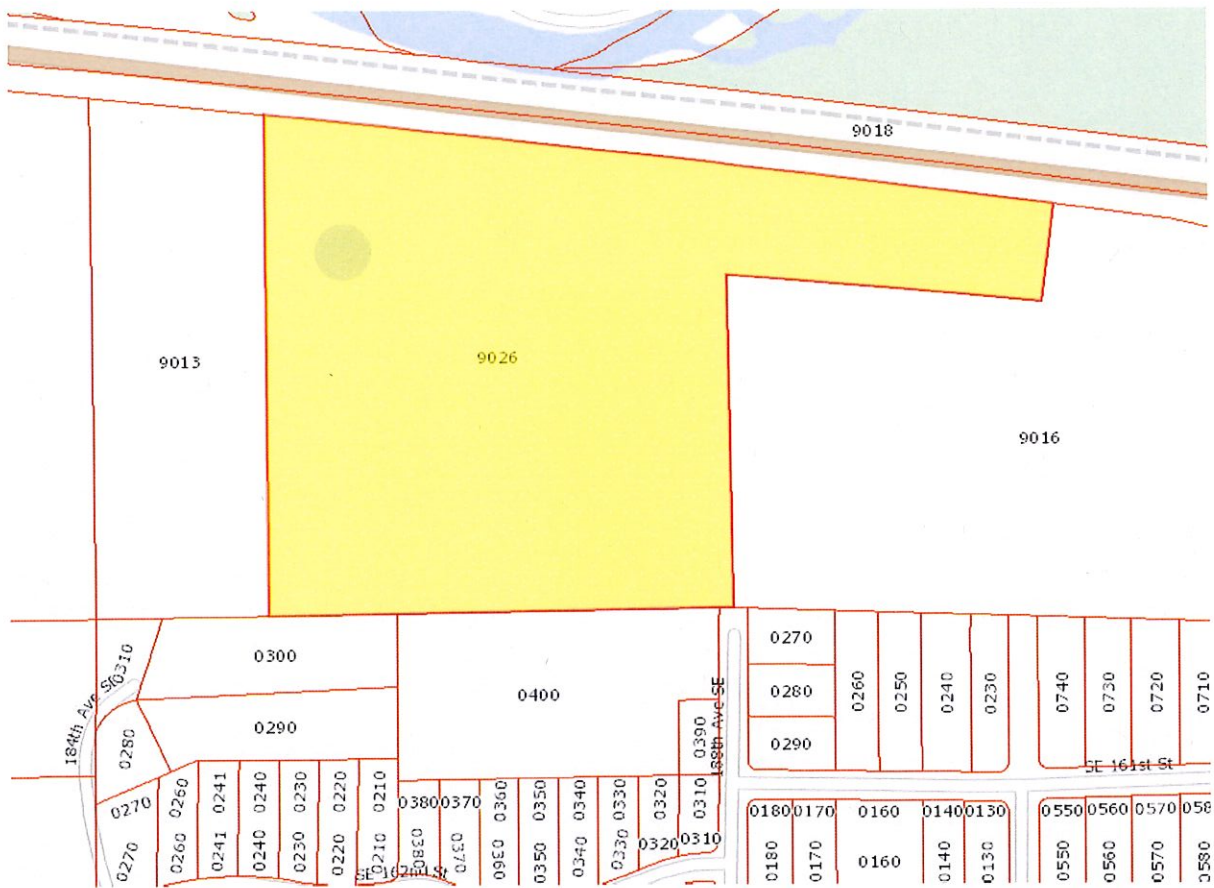


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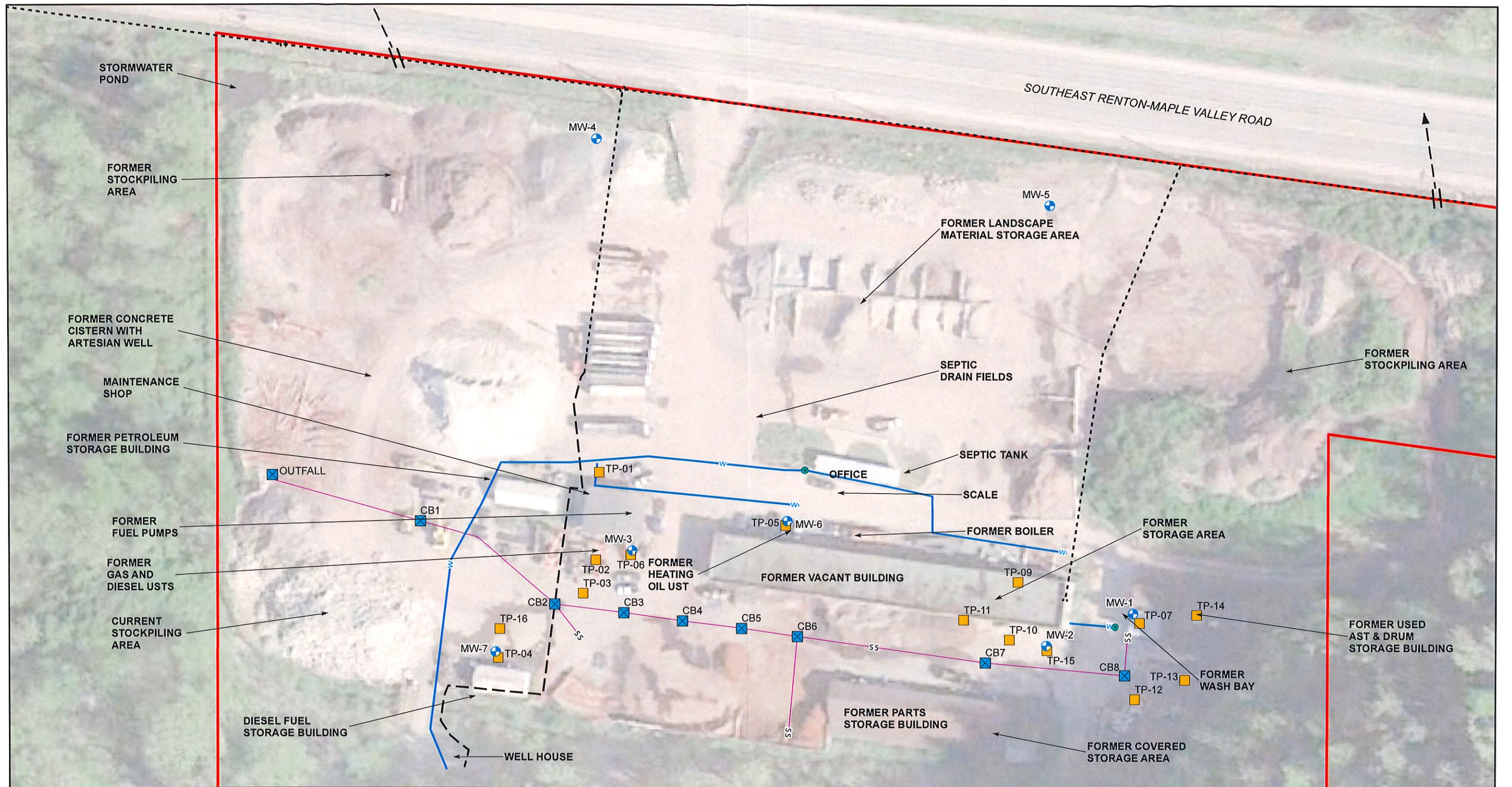
cc: Lakeside Industries, Inc.

WFJ:BT
Enclosures

ENCLOSURE 1



ENCLOSURE 2



LEGEND

MW-4		MONITORING WELL	OVERHEAD ELECTRIC LINE
TP-01		TEST PIT LOCATION	- - -	UNDERGROUND ELECTRIC LINE
CB1		CATCH BASIN LOCATIONS	SS	STORM SEWER LINE
		SPIGOT LOCATION	W	WATER UTILITY LINE
		SITE BOUNDARY	==	CULVERT
			- ->	CULVERT DIRECTIONAL FLOW TO RIVER

NOTES:
 1) AST = ABOVEGROUND STORAGE TANK
 2) UST = UNDERGROUND STORAGE TANK
 3) THE SITE SLOPES NORTH
 KING COUNTY PARCEL
 1923069026

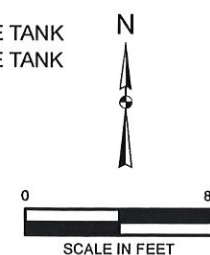


FIGURE 2
 SITE PLAN
 LAKESIDE INDUSTRIES
 18825 SOUTHEAST RENTON-
 MAPLE VALLEY ROAD
 RENTON, WASHINGTON