

TECHNICAL MEMORANDUM

DATE: May 17, 2018

TO: Ms. Sonia Fernandez, VCP Coordinator, WA Dept. of Ecology, NWRO

CC: Mr. Mike Raskin, MJR Development
Mr. Christian LaRocco, MJR Development

FROM: Mr. Eric Koltes and Ms. Tena Seeds

RE: Response to Comments on Remedial Investigation Checklist
Meeker Former Gas Station Site
105 Washington Ave N., Kent, WA
Cleanup Site ID: 2782
Facility/Site ID: 44681713
VCP Project ID: NW3167

EPI Project Number: 65112.5

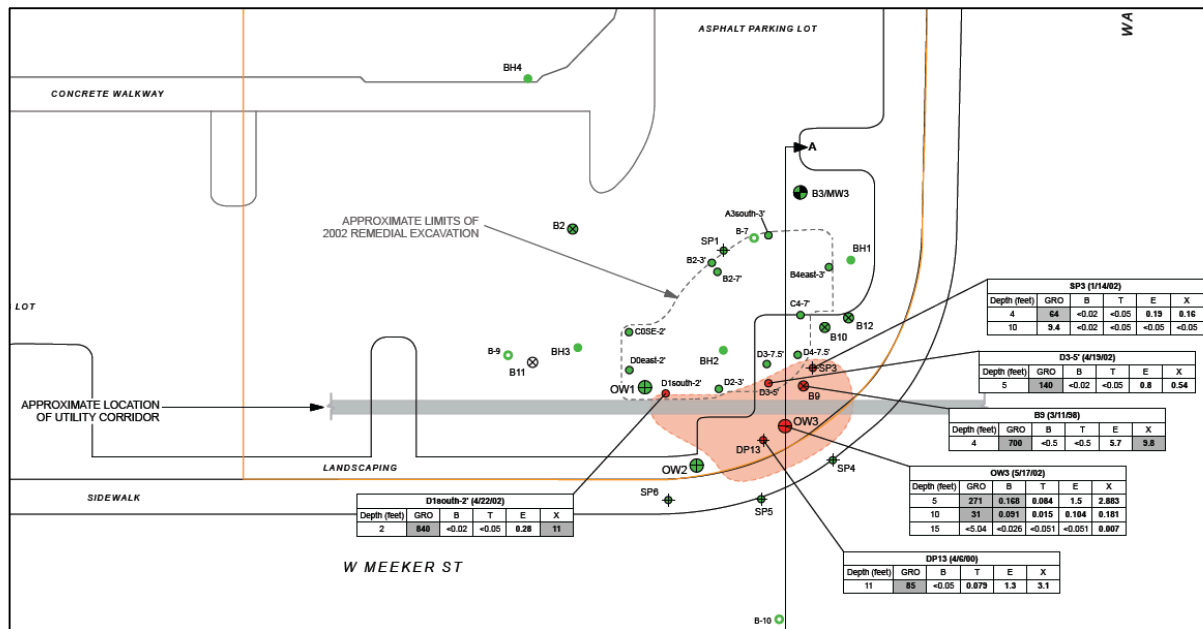
This Technical Memorandum has been prepared in response to the Washington State Department of Ecology (Ecology) letter dated March 16, 2018, regarding a request for additional information to provide an advisory opinion on the investigation and cleanup of the above-referenced Site.

An Ecology-developed *Remedial Investigation Checklist* (RI Checklist) was enclosed with the letter that included preliminary comments on the completeness of the *Remedial Investigation, Feasibility Study, and Cleanup Action Plan* (RI/FS/CAP) prepared for the Site. The RI/FS/CAP, dated September 1, 2017, was prepared by Environmental Partners, Inc. (EPI) on behalf of MJR Development and was submitted to Ecology with an application for enrollment into Ecology's Voluntary Cleanup Program (VCP). Ecology's comments on the RI Checklist indicated that additional items may be necessary to complete the RI/FS/CAP so that Ecology can provide a written opinion. Ecology's comments and EPI's responses to those comments are presented below.

Ecology comment regarding Site Characterization (RI Checklist page 1):

The site may not be adequately characterized due to off-site contamination and possible contamination in utility corridor. Need additional information in this area.

EPI believes that the Site is sufficiently characterized. All contaminated soil was removed to the maximum extent practicable in 2002. After the soil removal, sampling was performed at all possible locations. The following image illustrates the area of contaminated soil that was removed in 2002 and all post-excavation sampling locations.



(Image Source: RI/FS/CAP, September 1, 2017)

The sampling locations were selected based on existing data and were limited by the presence of dense utilities, natural gas lines, and other buried infrastructure associated with the major arterial intersection, including traffic-related sensors beneath the adjacent roadway to the east. As illustrated in the above image, the off-site extent of remaining impacted media is well defined to the south and southeast and no additional characterization is possible or necessary. EPI would like to discuss any perceived data gaps with the Ecology Site Manager, when assigned.

Ecology comment regarding Conceptual Site Model (RI Checklist page 2):

The air pathway not evaluated. Gas and benzene are still present. What about the worker exposure scenario?

The air pathway has been addressed. Indoor air is not a medium of concern as explained in Section 3.2 of the RI/FS/CAP: there were no buildings present on the subject property during most of the RI activities; the current building was constructed following removal of contamination within the property boundary; and residual soil and groundwater concentrations remaining after the 2002 soil removal action do not post a potential threat to indoor air quality. Furthermore, remaining impacts on the subject property are greater than 30 feet from the existing building, which is the recommended minimum horizontal separation distance in Ecology and EPA guidance. The air pathway is also addressed on the CSM diagram in Attachment D of the RI/FS/CAP, which is associated with volatilization from soil impacts and resulting inhalation risks for construction worker exposures.

Ecology comment regarding Summary and Conclusions (RI Checklist page 2):

The DCA is incomplete. Alternatives must compare to most permanent remedy. Further remedial actions will be needed to support leaving inaccessible contamination. Regional manager will not sign off on a covenant until site completely characterized and all reasonable cleanup measures have been implemented.

We believe that the disproportionate cost analysis (DCA) presented in the RI/FS/CAP is complete. The DCA shows that it would not be feasible to implement a more permanent remedy at this time because the remaining impacts are not readily accessible for remediation. The cost to implement anything other than institutional controls is disproportionate to the net benefit received. If there any data gaps concerning the DCA are identified, EPI would like to resolve them with the Ecology Site Manager, when assigned.

Ecology comment regarding Site Maps (RI Checklist page 3):

A figure showing historical site features and sources such as, USTs, dispensers, waste or heating oil not provided. Just general "tank basin". Need additional information.

Additional information regarding gas station features and historical structures has not been made available to EPI. The location of the tank basin was estimated based on a description in reports from the previous consultant, which were provided to Ecology. We are unable to add historical site features to the site map figures at this time.

Ecology comment regarding Site Maps (RI Checklist page 3):

Unclear if MTCA boundary estimate is accurate. Extent of impacts to utility corridor need to be defined.

The Site has been characterized to the maximum extent practicable. We are unable to further define the extent of impacts to the utility corridor at this time due to the presence of dense infrastructure and natural gas lines within the corridor. EPI would like to discuss this with the Ecology Site Manager, when assigned.

Ecology comment regarding Site Maps (RI Checklist page 3):

GW evaluation needs hydro review.

We believe there is sufficient information contained within the RI/FS/CAP that pertains to hydrogeological conditions at the Site. Figure 5 of the RI/FS/CAP shows groundwater elevations, contours, and estimated flow direction measured in June 2002. In addition, the cross-section in Figure 7 of the RI/FS/CAP shows groundwater levels measured in 2002 and 2015.

Ecology comment regarding Site Maps (RI Checklist page 3):

Missing some historical features and sources.

EPI incorporated all of the site features on reasonably ascertainable data from the reports that were provided to Ecology, aerial photographs, and available historical maps. No additional data are available at this time. EPI does not believe that this lack of information material affects the outcome of the investigations or prior remediations conducted. EPI would like to discuss this with the Ecology Site Manager, when assigned.

Ecology comment regarding Conceptual Site Model figure (RI Checklist page 3):

Groundwater pathway not evaluated.

The CSM figure in Attachment D of the RI/FS/CAP does show the groundwater pathway.

Ecology comment regarding Remedial Investigation Appendices (RI Checklist page 4):

Missing 2003 soil boring logs.

EPI does not have access to the 2003 soil boring logs or copies of any boring logs and well logs prepared by previous consultants for the Meeker Former Gas Station Site. As such, EPI was unable to provide historical boring logs and well logs in the RI/FS/CAP.

Ecology comment regarding Miscellaneous Items, Environmental Information Management (RI Checklist page 4):

Data needs to be submitted into EIM.

All EIM data for the Meeker Former Gas Station Site were submitted on March 7, 2018. EPI is awaiting a response from the Ecology EIM Coordinator.