SCS ENGINEERS







CONTAMINATED-MEDIA MANAGEMENT PLAN

BELLEVUE SOUTH PROJECT

(Former Eastside Chrysler Jeep Site)
126-200 116th Avenue NE
Bellevue, Washington

Presented to:

Bellevue 116th Avenue South, LLC
11225 SE 6th Street, Suite 215
Bellevue, Washington 98004
(425) 450-1550

Presented by:

SCS ENGINEERS
2405 140th Ave NE, Ste 107
Bellevue, Washington 98005
(425) 746-4600

May 23, 2018
Project No. 04218014.00
File: BellevueS_ContMediaMgtPlan_v1.0

Offices Nationwide
www.scsengineers.com

Contaminated-Media Management Plan

Bellevue South Project
Former Eastside Chrysler Jeep Site
126-200 116th Avenue NE
Bellevue, Washington

Presented to:

Bellevue 116th Avenue South, LLC
11225 SE 6th Street, Suite 215
Bellevue, Washington 98004
(425) 450-1550

Presented by:

SCS ENGINEERS
2405 140th Ave NE, Ste 107
Bellevue, Washington 98005
(425) 746-4600

May 23, 2018
File No. 04218014.00

Brian G. Doan, CSP
Project Manager
SCS ENGINEERS

Gregory D. Helland, LG, LHG
Project Director
SCS ENGINEERS

Table of Contents

Section **Page**

Appendices

1.0 INTRODUCTION

This document is a plan for managing contaminated environmental media at the Bellevue South redevelopment site located at 126 to 200 116th Avenue NE in Bellevue, Washington (Figure 1). The Bellevue South project site includes the former Eastside Chrysler Jeep site, which formerly performed automotive maintenance and repair at the property. The Washington State Department of Ecology (Ecology) has listed the property as a known contaminated site (Ecology site identifier NW0106). Groundwater contamination has been confirmed at the site, and soil contamination is expected under the footprint of the former dealership building and in the immediate vicinity. Redevelopment of the site will involve an independent cleanup action to remediate soil and groundwater. The intention is to enter the site into Ecology's Voluntary Cleanup Program with the goal of obtaining a no-further-action (NFA) designation for the Property.

The majority of the property is currently covered with asphalt paving and the concrete floor of the former auto dealership building, a two-story, 31,056 square foot masonry structure built in 1965. Most of the ground floor area was occupied by auto service bay areas, with a show room at the west end. Oil/water separators at the southwest corner of the building served trench drains throughout the service bays and a wash rack at the southwest corner of the building footprint. The building was vacated in approximately 2009 and demolished in 2017. Outdoor areas of the Property were used for overflow parking of new automobiles. The east end of the site abuts a steep, vegetated slope.

The former automotive service operations resulted in soil and groundwater contamination at the property. In the 1990s, above-ground and underground storage tanks (ASTs and USTs) were removed and cleanup actions were undertaken, including the limited removal of contaminated soil. Oxygen Release Compound (ORC) was placed in select monitoring wells installed in the automotive service area to enhance bioremediation of the residual petroleum contamination of the groundwater. However, the presence of the dealership building limited the remedial activities.

Ecology issued a no-further-action (NFA) designation for the site in January 2000, with the understanding that the residual soil contamination would remain covered by the Eastside Chrysler Jeep building. It was noted, however, that shallow groundwater beneath the building and its attached car wash continued to contain diesel- and oil-range petroleum in excess of state cleanup standards (MTCA Method A) at that time.

The property will be redeveloped for retail use through construction of a retail building with four floors of parking. Along the south and east edges of the property, a garage access road is planned. Redevelopment activities will include soil removal from approximately the northeast half of the site, and filling in approximately the southwest half of the property. At the location of the former dealership building, redevelopment plans currently call for approximately 1 to 6 feet of fill.

1.1 PURPOSE

This plan provides procedures for the proper management of contaminated soil and groundwater that may be encountered during the Bellevue South redevelopment. The contaminated media will be managed by the general contractor with technical input from SCS Engineers (SCS). A description of the contamination is provided below in Section 1.2.

1.2 CONTAMINANT NATURE AND EXTENT

Several investigations and limited environmental cleanups have occurred at the site. As noted above, environmental investigations and limited remediation activities in the 1990s resulted in an NFA designation in 2000.

The most recent investigation was performed by SCS in March 2018. Two investigations performed since 2010 identified groundwater contamination exceeding state cleanup levels but only limited soil impacts, and no soil contamination exceeding state cleanup levels. The affected area roughly corresponds to the footprint of the former building.

1.2.1 Soil

Based on data from the 1990s, petroleum-contaminated soil (PCS) is suspected to be present beneath the former auto dealership building.

However, soil samples collected by SCS in 2018 identified detectible concentrations of petroleum at only three of the twelve locations sampled. Specifically, total petroleum hydrocarbons (TPH) in the oil range were detected in the following locations:

- At the southwest corner of the former building, southwest of the oil/water separator vaults
- Inside the south end of the east service area (a low concentration of diesel-range TPH was also reported at this location)
- Inside the northeast corner of the east service area

None of the reported TPH concentrations exceeded the Washington State cleanup level for oil-range TPH in soil. However, soil containing low but detectible petroleum concentrations will need to be properly managed and disposed of if it is to be removed from the site (see Section 2.2.2, below). Additional analyses performed on six of the soil samples collected in March 2018 did not identify elevated concentrations of gasoline-range TPH, gasoline-constituent BTEX compounds (benzene, toluene, ethylbenzene, and xylenes), volatile organic compounds (VOCs), or heavy metals.

SCS anticipates that additional PCS may be encountered once the redevelopment excavation is underway. Soil contamination is considered likely in the following locations:

- In the northeast corner of the east service bay area, where a limited quantity of PCS was previously removed from a former open-bottom service pit, and where the presence of groundwater contamination suggests a source area of soil contamination may remain.

- In the vicinity of floor trench drains that run the length (north-south) of the central service bay area and the east service bay area.

- At the oil/water separator vaults, which are situated beneath the southwest portion of the former building footprint.

- Along underground plumbing that serves the trench drains and oil/water separators.

This plan includes procedures for monitoring, evaluating and addressing suspected soil contamination as it is encountered during the redevelopment (see Section 2.2.1, below).

1.2.2 Groundwater

The groundwater sample locations, results for oil-range TPH, and approximate, estimated, groundwater contaminant contours (oil-range TPH) are depicted on Figure 2 in Appendix A. Groundwater sampling of three existing monitoring wells (previously installed for geotechnical purposes) and twelve investigative borings in March 2018 identified TPH in the oil and diesel ranges at nine locations under the footprint of the former building. Specifically, TPH in the diesel and oil ranges was reported in the groundwater beneath the footprint of the building and near the oil/water separators at the building's southwest corner at concentrations that exceed the Washington State cleanup level for these constituents in groundwater. No gasoline-range TPH, BTEX compounds, or VOCs were detected in groundwater samples in March 2018.

Arsenic, chromium, and lead concentrations slightly exceeded state groundwater cleanup levels in the recent groundwater samples collected within the footprint of the former building. However, the exceedances are interpreted by SCS to be artifacts of turbidity associated with the sampling methodology (collecting unfiltered samples from direct-push borings, not from properly installed and developed monitoring wells), and the fact that the sample bottles contained an acid preservative, consistent with Ecology requirements for metals sampling at MTCA sites.

If dewatering is necessary during the redevelopment at or near the location of the former building, it will be necessary to properly characterize and manage the groundwater, due to the confirmed presence of TPH groundwater contamination (see Sections 2.4 and 2.5, below).

SCS identified five groundwater monitoring wells at the site. The well locations are depicted on Figure 1 along with each well's unique Ecology-registered identifier. The wells were properly decommissioned by a licensed driller on May 9, 2018.

2.0 CONTAMINATED-MEDIA MANAGEMENT

Given that diesel- and oil-range TPH are the only soil contaminants that have been detected by recent investigations, soils exhibiting staining or petroleum odors will be suspected of being contaminated and will be subject to characterization and proper management consistent with the procedures below in Sections 2.1 through 2.3.

If dewatering occurs at or near the location of the former building, the removed groundwater will be subject to characterization and proper management consistent with the procedures below in Sections 2.4 and 2.5.

2.1 SOIL CHARACTERIZATION

Throughout the project, SCS will be at the site or available on an on-call basis to collect samples of suspected soils for laboratory analysis. Soil samples will be collected from soil horizons exhibiting the greatest potential for residual contamination based on field observations. The laboratory results will determine the options to properly manage the soil. SCS will communicate the analytical results to the project owner and contractor.

As mentioned above, contaminated soil has not been confirmed by recent investigations but may be anticipated in the following locations:

- In the northeast corner of the east service bay area, where soil contamination was previously removed from a former open-bottom service pit, and where the presence of groundwater contamination suggests a source area of contamination may remain.
- In the vicinity of floor trench drains that run the length (north-south) of the central service bay area and the east service bay area.
- At the oil/water separator vaults, which are situated beneath the southwest portion of the former building footprint.
- Along underground plumbing that serves the trench drains and oil/water separators.

Other contaminated soils may be encountered during the Bellevue South redevelopment. During the site work, and particularly when all or portions of the former building slab and surrounding asphalt paving is removed, SCS should be present at the site to characterize soils in this area. Field indications of potential contamination include staining and petroleum odors.

Based on past use of the property for automotive repair and maintenance, the soil samples will typically be analyzed for the following contaminants:

- Diesel-range and oil-range TPH by NWTPH-Dx

Selected samples will be analyzed for the following additional contaminants:

- Metals (MTCA 5 metals: arsenic, cadmium, chromium, mercury, and lead) by EPA Methods 6020 and 7471.

- Gasoline-range TPH by method NWTPH-Gx.

- Gasoline-constituent BTEX compounds (benzene, toluene, ethylbenzene, and xylenes), gasoline-related fuel additives and blending compounds (MTBE, EDB and EDC), and halogenated volatile organic compounds (HVOCs) by EPA Method 8260.

- Carcinogenic poly-cyclic aromatic hydrocarbons (PAHs) and naphthalenes by EPA Method 8270.

- Polychlorinated biphenyls (PCBs) by EPA Method 8082.

This analytical list may be modified based on sample-specific information, including staining, odors, sample location, the results of nearby samples, and any additional analytical requirements of an off-site treatment or disposal facility. Soil samples for VOC analysis (gasoline, BTEX compounds, and halogenated VOCs) will be preserved in the field consistent with EPA Method 5035 to limit the loss of volatile contaminants from the samples.

2.2 SOIL MANAGEMENT

Soils that will require management fall into three classes:

1. Soils that exhibit staining or petroleum odors, but lab data are not yet available. This plan will refer to these soils as “suspect soils.”

2. Soils with contaminant concentrations exceeding Washington State soil cleanup levels. This plan will refer to these soils as “contaminated soils.”

3. Soils with detectible contaminant concentrations that are below state soil cleanup levels but are higher than levels for clean (unimpacted) soil. This plan will refer to these soils as “affected soils.”

The project approach will focus on characterizing suspect soils first, removing contaminated soils for proper off-site treatment and/or disposal as soon as possible once it has been determined that they are contaminated, and managing affected soils on the site as conditions allow. Procedures for managing these three classes of soils are provided below. To the extent possible, all soil characterizing will be performed in advance of the soil excavation.

2.2.1 Suspect Soil

Suspect soils encountered during the excavation activities may need to be stockpiled to allow for the sampling and laboratory testing that will be necessary to determine whether soils are contaminated. The location for the stockpile area will be established by the contractor, but is expected to be close to the former location of the dealership building. The stockpile area must be underlain with sheet plastic with a lined perimeter (for example, wrap the sheet plastic floor over hay bales) that will retain erosion and runoff. The stockpiled soils must also be covered to

prevent contact with precipitation. Stockpiled soils will be characterized according to the procedures outlined above in Section 2.1.

2.2.2 Contaminated Soil

Contaminated soils will be excavated, properly managed, and removed from the site for treatment or disposal. The standard soil management procedure will be to immediately haul contaminated soils to an approved disposal facility. If immediate off-site hauling is not feasible, soils must be stored in a lined and bermed area, and covered to minimize contact with stormwater.

For the purposes of this project, contaminated soils are those that exceed MTCA Method A cleanup levels. For example, the MTCA Method A cleanup level for diesel- or oil-range TPH is 2,000 parts per million (ppm).

The selected soil treatment or disposal facility must be permitted to accept the contaminated soil. Receiving facilities typically require laboratory analytical data to characterize the soil for treatment or disposal. The contractor will need to make arrangements with the receiving facility prior to sending soils for off-site treatment or disposal. The arrangements should include identifying the following:

- Any specific laboratory analytical requirements, which would need to be communicated to SCS for inclusion in the soil characterization.

- Any restrictions on the incoming soils, such as no free liquids.

2.2.3 Affected Soil

Soils containing low but detectible contaminant concentrations (less than MTCA Method A cleanup levels) may be managed on the site as fill. However, if it becomes necessary to remove affected soils, it will be necessary to properly manage the soil as other than clean fill. Affected soil must be sent to a facility with the proper permits to accept and dispose of the material.

The contractor may want to carefully consider the options for managing affected soils so as to select the most efficient option. For instance, affected soils containing up to 460 ppm diesel or oil-range TPH can be accepted at the Cadman inert debris landfill in Everett, while soils with higher TPH concentrations can be accepted at Cadman's thermal treatment ("dirt burner") facility, also in Everett, for a somewhat higher cost. The contractor may wish to prioritize the on-site use of affected soils for fill material, thereby minimizing the cost of off-site treatment for soils that exceed the acceptance criteria of the inert debris landfill or similar facilities.

2.3 SOIL CONFIRMATION SAMPLING

Confirmation soil sampling will be performed where contaminated soil has been removed for off-site treatment or disposal. The purpose of the confirmation sampling is to verify that soil contamination exceeding state cleanup levels has been removed. Soil samples from each remedial excavation will be collected from soil horizons exhibiting the greatest potential for residual contamination based on field observations. The number of confirmation samples

collected for laboratory analysis will be determined by SCS in the field based on excavation-specific features, such as its size, depth, uniformity of soil, the presence of intersecting utilities, etc. The samples will typically be collected from the excavator bucket to avoid entering the excavation.

It is important for the contractor to bear in mind that further excavation cannot recommence until confirmation laboratory results are available verifying that the contaminated and affected soils have been removed, unless otherwise directed by SCS.

2.4 GROUNDWATER CHARACTERIZATION

Groundwater is expected at depths of approximately 1 to 4 feet below ground surface (bgs) in the vicinity of the former dealership building. Therefore, dewatering and management of groundwater may be necessary during removal of the slab subbase and underground utilities, as well as during removal of contaminated soil. Given that groundwater is known to be contaminated in this area, it should be noted that localized groundwater dewatering could improve the site's groundwater quality, perhaps significantly. The highest groundwater contaminant concentrations detected in March 2018 were in samples collected from beneath the northeast corner of the former building.

SCS will be at the site or available on an on-call basis to collect samples of groundwater that is removed during dewatering adjacent to contaminated soil. Samples will be collected directly from the excavation without the installation of groundwater monitoring wells. The samples will not be considered truly representative of actual groundwater conditions, but they will be appropriate for characterizing groundwater for disposal and will meet the needs of the redevelopment project.

Based on past use of the property for automotive repair and maintenance, the groundwater samples will typically be analyzed for the following contaminants:

- Diesel-range and oil-range TPH by NWTPH-Dx.

Selected samples may be analyzed for the following additional contaminants:

- Metals (MTCA 5 Metals: arsenic, cadmium, chromium, mercury, and lead) will be analyzed for by EPA Methods 6020 and 7471.
- Gasoline-range TPH by method NWTPH-Gx.
- Gasoline-constituent BTEX compounds (benzene, toluene, ethylbenzene, and xylenes), gasoline-related fuel additives and blending compounds (MTBE, EDB and EDC), and halogenated volatile organic compounds (HVOCs) by EPA Method 8260.
- Carcinogenic poly-cyclic aromatic hydrocarbons (PAHs) and naphthalenes by EPA Method 8270.
- Polychlorinated biphenyls (PCBs) by EPA Method 8082.

This analytical list may be modified based on sample-specific information, including odors, sample location, the characteristics of adjacent soils (e.g., staining and lab results), and any additional analytical requirements of an off-site treatment or disposal facility.

2.5 GROUNDWATER MANAGEMENT

If necessary to dewater from the areas where recent sampling indicated that the groundwater is contaminated, the preferred method will involve using a vactor truck. The contaminated groundwater will be pumped directly into the truck's tank and hauled off-site for treatment and disposal.

Ecology's Administrative Order for the project contains prescriptive requirements for containerizing, treating, and testing groundwater if the groundwater will be discharged to the local stormwater utility. The Order prohibits direct discharge of untreated site stormwater or groundwater to the local stormwater system.

Groundwater that is suspected of being contaminated will be managed by the contractor consistent with the following procedure:

- Rent a water storage tank with sufficient capacity to contain suspect contaminated groundwater.
- Pump suspect groundwater into the tank if dewatering is necessary at or in the vicinity of the former dealership building.
- SCS will characterize the groundwater according to Section 2.4 and will communicate the results to the project owner and contractor.
- Arrangements for the discharge or disposal of the water will be made by the contractor based on the results of the characterization data.

2.6 STORMWATER MANAGEMENT

Ecology's Administrative Order No. 15738 for the project contains prescriptive requirements for stormwater management. Please refer to the Administrative Order and any amendments for actions that must be taken to remain in compliance with Ecology's stormwater requirements for the project site.

3.0 QUALITY ASSURANCE/QUALITY CONTROL

Field notes and field sampling data sheets (FSDSs) will be maintained to document field activities and sample collection. Entries should be made in indelible ink and changed by crossing out the entry with a single line and initializing it.

Soil samples will be collected from the center of the excavator bucket in order to prevent potential cross contamination. New nitrile gloves will be donned for each sample collected, and the samples will be placed into pre-cleaned, laboratory-supplied sample jars. As previously noted, soil samples for VOC analysis (gasoline, BTEX compounds, and halogenated VOCs) will be preserved in the field consistent with EPA Method 5035 to limit the loss of volatile contaminants from the samples.

Field instruments (PID and water-quality meter) will be properly maintained and calibrated consistent with the manufacturers' recommendations to a known standard daily before they are used, and their calibration will be checked periodically through the day if readings suggest it is necessary. Calibration dates and times will be recorded in the field.

All soil and groundwater samples will be kept in a chilled cooler during storage and transport to an Ecology-accredited testing laboratory. The samples will be transported and custody transferred using chain-of-custody (COC) protocols. COCs will be included in the analytical reports prepared by the laboratory.

All analyses will be performed within the appropriate holding times, typically on a rush basis to accommodate the redevelopment schedule. Laboratory reports will include a transmittal letter, sample results, method blank results, surrogate recovery results, chain-of-custody documents, laboratory duplicate results (when required by the method), and matrix spike or matrix spike duplicate results. The laboratory results will be reviewed to assess data quality and acceptability consistent with the project requirements.

4.0 HEALTH AND SAFETY

SCS prepared a Site-Specific Health and Safety Plan (SSHSP) to address site activities by SCS personnel during the recent soil and groundwater sampling. The SSHSP also addresses oversight and sampling activities by SCS personnel that will occur during the site redevelopment. The SSHSP will be updated to include specific requirements or restrictions contained in the general contractor's safety program for the Bellevue South project.

5.0 DATA EVALUATION AND REPORTING

5.1 REPORTING

Following the field work described above, and after receipt of the final analytical results, SCS will tabulate the field and chemical data, compare the results with MTCA cleanup standards, and prepare site-wide maps depicting soil cleanup areas, and confirmation soil sampling locations.

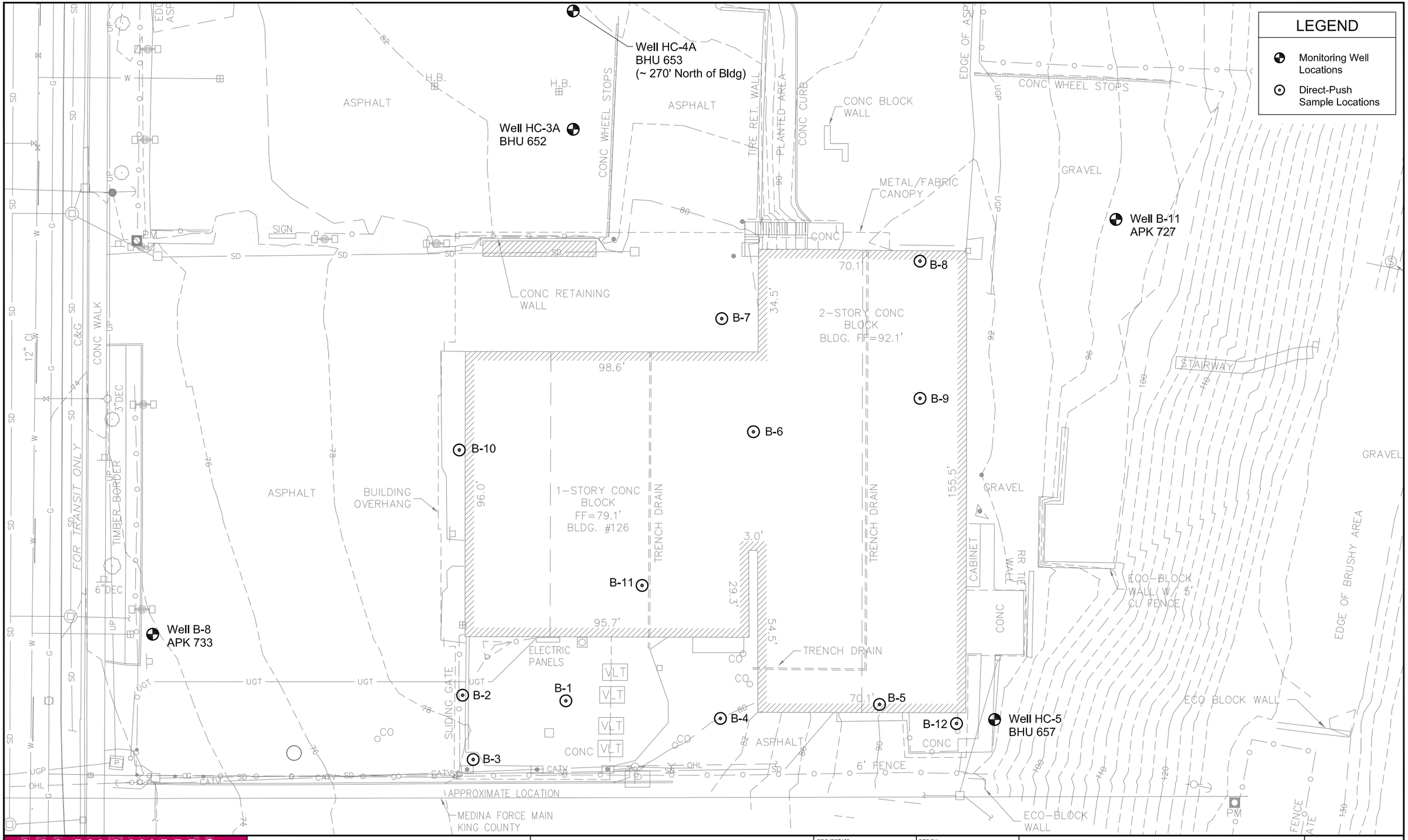
SCS will prepare a supplemental site assessment and cleanup report. The report will be presented as a single, comprehensive document that will summarize the previous site assessments, present the findings and results of the remedial excavation activities, and provide an evaluation of the site's post-remedial environmental conditions. The report will include summary data tables for the soil and groundwater analytical results; site maps depicting sample locations and cleanup areas; and supporting field and laboratory reports.

5.2 EIM DATA SUBMITTALS

Consistent with Ecology requirements for sites in the Voluntary Cleanup Program, field and chemical data obtained during the remedial redevelopment will be tabulated, formatted, and entered into Ecology's Electronic Data Management (EIM) system. The data will be uploaded to EIM at the conclusion of the fieldwork activities, after the supplemental assessment and site cleanup report has been submitted to Ecology.

Appendix A

Figures



SCS ENGINEERS Environmental Consultants and Contractors 2405 140th Avenue NE, Suite 107 Bellevue, Washington 98005 (425) 746-4600 FAX: (503) 684-6948	GRAPHIC SCALE: 0 10 20 30 SCALE IN FEET	SOURCE: BARGHAUSEN	PROJECT NO. 04218014.00 / DES BY B.D. SCALE AS SHOWN / CHK BY B.D. CAD FILE FIGURE 1 / APP BY G.H.	**INVESTIGATION SAMPLE LOCATIONS** FORMER EASTSIDE CHRYSLER/JEEP 126 - 200 116TH AVENUE NE BELLEVUE, WASHINGTON 98004	DATE MARCH 2018 FIGURE 1

LEGEND

- Monitoring Well Locations
- Direct-Push Sample Locations
- 800µg/L — TPH Concentration in Parts per Billion (µg/L)
- 500 — Approximate Contour of Contaminant Concentration
- ND — Contaminant Not Detected
- NS — Not Sampled

Well HC-4A
BHU 653
(~ 270' North of Bldg)
NS

Well HC-3A
BHU 652
ND

Well B-11
APK 727
NS

B-8
48000µg/L

B-7
6300µg/L

B-9
3200µg/L

B-6
800µg/L

B-10
780µg/L

B-11
660µg/L

B-5
3100µg/L

B-12
NS

B-4
440µg/L

B-1
150µg/L

B-2
ND

B-3
1600µg/L

Well B-8
APK 733
ND

Well HC-5
BHU 657
ND

500
1,000
4,000
40,000

ASPHALT
GRAVEL
CONC WHEEL STOPS
CONC BLOCK WALL
CONC RETAINING WALL
2-STORY CONC BLOCK BLDG. FF=92.1'
1-STORY CONC BLOCK FF=79.1' BLDG. #126
BUILDING OVERHANG
TRENCH DRAIN
ELECTRIC PANELS
SLIDING GATE
CONC WALK
FOR TRANSIT ONLY
TIMBER BORDER
STAIRWAY
ECO-BLOCK WALL (W/ 5' CL FENCE)
EDGE OF BRUSHY AREA
6' FENCE
APPROXIMATE LOCATION
MEDINA FORCE MAIN
KING COUNTY

GRAPHIC SCALE:
0 10 20 30
SCALE IN FEET

SOURCE: BARGHAUSEN

SCS ENGINEERS
Environmental Consultants and Contractors
2405 140th Avenue NE, Suite 107
Bellevue, Washington 98005
(425) 746-4600 FAX: (503) 684-6948

PROJECT NO.	04218014.00
DES BY	B.D.
SCALE	AS SHOWN
CHK BY	B.D.
CAD FILE	FIGURE 2
APP BY	G.H.

INVESTIGATION SAMPLE LOCATIONS AND ESTIMATED GROUNDWATER CONTAMINANT CONTOURS

FORMER EASTSIDE CHRYSLER/JEEP
126 - 200 116TH AVENUE NE
BELLEVUE, WASHINGTON 98004

DATE: APRIL 2018

FIGURE: 2

Appendix B

Table

Table 1
SUMMARY OF 2018 INVESTIGATION ANALYTICAL RESULTS
BELLEVUE SOUTH, FORMER EASTSIDE CHRYSLER JEEP
BELLEVUE, WASHINGTON

Sample Designation	Location Description	Sample Date	Total Petroleum Hydrocarbons			Volatile Organic Compounds (VOCs)					Total Metals							
			TPH-G	TPH-D	TPH-Oil	Benzene	Toluene	Ethylbenzene	Total Xylenes	Volatile Organic Compounds (VOCs)	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
			milligrams per kilogram (mg/kg, or parts per million)															
SOIL RESULTS from Planning Investigation Samples (March 5 & 6, 2018)																		
B-1-7'	West of oil/water separators	3/5/2018	<3	<25	<50	<0.030	<0.050	<0.050	<0.20	ND	2.2	31	<0.50	24	1.4	<0.020	<5	<0.50
B-2-3'	Near southwest corner of bldg	3/5/2018	<3	<25	<50	<0.030	<0.050	<0.050	<0.20	ND	2.0	38	<0.50	25	1.9	<0.020	<5	<0.50
B-3-4'	20 feet south of B-2	3/5/2018	--	<120	1,700	--	--	--	--	--	--	--	--	--	--	--	--	--
B-4-7'	Near SW corner of east service bays	3/5/2018	<3	<25	<50	<0.030	<0.050	<0.050	<0.20	ND	1.7	22	<0.50	16	1.3	<0.020	<5	<0.50
B-5-0.5'	Inside south end of east service bays	3/5/2018	--	68	130	--	--	--	--	--	--	--	--	--	--	--	--	--
B-6-1'	Between east and west service bays	3/5/2018	--	<25	<50	--	--	--	--	--			<0.50			<0.020	<5	<0.50
B-7-4'	Appox. 70 feet west of B-8	3/5/2018	<3	<25	<50	<0.030	<0.050	<0.050	<0.20	ND	1.2	25	<0.50	18	1.2	<0.020	<5	<0.50
B-8-1'	Inside NE corner of east service bays	3/5/2018	<3	<25	53	<0.030	<0.050	<0.050	<0.20	ND	1.4	33	<0.50	17	1.6	<0.020	<5	<0.50
B-9-1'	Approx. 50 feet south of B-8	3/5/2018	<3	<25	<50	<0.030	<0.050	<0.050	<0.20	ND	1.3	26	<0.50	16	1.8	<0.020	<5	<0.50
B-10-10'	Immediately west of former showroom	3/5/2018	--	<25	<50	--	--	--	--	--	--	--	--	--	--	--	--	--
B-11-7'	Inside south portion of west service bays	3/6/2018	--	<25	<50	--	--	--	--	--	--	--	--	--	--	--	--	--
B-12-3'	Outside SE corner of east service bays	3/6/2018	--	<25	<50	--	--	--	--	--	--	--	--	--	--	--	--	--
Ecology MTCA Method A:			*100*	*2,000*	*2,000*	*0.03*	*7*	*6*	*9*	*Various*	*20*	*None*	*2*	*2,000*	*250*	*2*	*None*	*None*
			micrograms per liter (µg/l, or parts per billion)															
GROUNDWATER RESULTS from Planning Investigation Samples (March 5 & 6, 2018)																		
B-1	West of oil/water separators	3/5/2018	<50	150	<250	<2	<2	<2	<2	ND	3.7	18	<1	4	<1	<0.20	<4	<1
B-2	Near southwest corner of bldg	3/5/2018	<50	<130	<250	<2	<2	<2	<2	ND	**19.0**	370	<1	**73**	6.3	<0.20	<4	<1
B-3	20 feet south of B-2	3/5/2018	--	**560**	**1,600**	--	--	--	--	--	--	--	--	--	--	--	--	--
B-4	Near SW corner of east service bays	3/5/2018	<50	210	440	<2	<2	<2	<2	ND	**30**	3200	1.7	**78**	2.4	<0.20	<4	<1
B-5	Inside south end of east service bays	3/5/2018	--	**1,700**	**3,100**	--	--	--	--	--	--	--	--	--	--	--	--	--
B-6	Between east and west service bays	3/5/2018	--	500	**800**	--	--	--	--	--	--	--	--	--	--	--	--	--
B-7	Appox. 70 feet west of B-8	3/5/2018	<50	**1,400**	**6,300**	<2	<2	<2	<2	ND	**13**	290	<1	**140**	13	<0.20	<4	<1
B-8	Inside NE corner of east service bays	3/5/2018	<50	**33,000**	**48,000**	<2	<2	<2	<2	ND	4.7	76	<1	15	**32**	<0.20	<4	<1
B-9	Approx. 50 feet south of B-8	3/5/2018	<50	**1900**	**3200**	<2	<2	<2	<2	ND	7.7	140	1.2	37	**43**	<0.20	<4	<1
B-10	Immediately west of former showroom	3/5/2018	--	390	**780**	--	--	--	--	--	--	--	--	--	--	--	--	--
B-11	Inside south portion of west service bays	3/6/2018	--	340	**660**	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-B-8	Near Southwest corner of property	3/6/2018	--	<130	<250	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-HC-5	Near Southeast corner of property	3/6/2018	--	<130	<250	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-HC-3A	North of former building	3/6/2018	--	<130	<250	--	--	--	--	--	--	--	--	--	--	--	--	--
Ecology MTCA Method A:			*1,000*	*500*	*500*	*5*	*1,000*	*700*	*1,000*	*Various*	*5*	*None*	*5*	*50*	*15*	*2*	*None*	*None*

Notes:
TPH-G = gasoline-range total petroleum hydrocarbons
TPH-D = diesel-range total petroleum hydrocarbons
TPH-Oil = Oil-range total petroleum hydrocarbons
<5 = Not detected at or above the reporting or detection limit indicated
-- = Not analyzed
MTCA = Model Toxics Control Act
Shaded concentrations exceed the MTCA Method A screening level value

Appendix C

Department of Ecology
Administrative Order 15738

Mr. Scott Holbrook
KG Investment Properties, LLC
11225 SE 6th Street, Ste 215
Bellevue, WA 98004-6477

Order Docket No.	15738
Site Location	Bellevue South – 200 116th Avenue NE, Bellevue, WA 98004

Re: Administrative Order

Dear Mr. Holbrook:

The Department of Ecology (Ecology) has issued the enclosed Administrative Order (Order) requiring KG Investment Properties, LLC to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) – State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) – Water Quality Standards for Surface Waters of the State of Washington.
- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit, Permit Number WAR306225.

If you have questions, please contact Evan Dobrowski at 425-649-7276 or edob461@ecy.wa.gov.

Sincerely,

Rachel McCrea
Water Quality Section Manager
Northwest Regional Office
Washington State Department of Ecology

Enclosure: Administrative Order Docket No. 15738

By Certified Mail No.: 9171 9690 0935 0084 1037 17

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN ADMINISTRATIVE ORDER AGAINST KG Investment Properties, LLC Mr. Scott Holbrook	)))))	ADMINISTRATIVE ORDER DOCKET NO. 15738

To: Mr. Scott Holbrook
KG Investment Properties, LLC
11225 SE 6th Street, Ste 215
Bellevue, WA 98004-6477

Order Docket No.	15738
Site Location	Bellevue South – 200 116th Avenue NE, Bellevue, WA 98004

The Washington State Department of Ecology (Ecology) has issued this Administrative Order (Order) requiring the KG Investment Properties, LLC to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) – State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) – Water Quality Standards for Surface Waters of the State of Washington.
- Construction Stormwater General Permit WAR306225: National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction Activity.

This is an Administrative Order in accordance with General Condition G13 (Additional Monitoring) as set forth in the Construction Stormwater General Permit. RCW 90.48.120(2) RCW authorizes Ecology to issue Administrative Orders to accomplish the purposes of Chapter 90.48 RCW.

ORDER TO COMPLY

KG Investment Properties, LLC is subject to coverage under NPDES Construction Stormwater General Permit WAR306225 for construction activities associated with the construction site known as Bellevue South. KG Investment Properties, LLC reported that the site contains contaminated groundwater and soil which has the potential to discharge in stormwater and dewatering water due to the proposed construction activity. The Construction Stormwater General Permit does not have water quality sampling or benchmarks for the known constituents of concern listed in Table 1; however, the permit requires compliance with the Water Quality Standards for Surface Water of the State of Washington (Water Quality Standards).

The Order establishes Indicator Levels for the Bellevue South. Indicator Levels express a pollutant concentration used as a threshold, below which a pollutant is considered unlikely to cause a water quality violation, and above which it may. Indicator Levels in this Administrative Order were derived from the WAC 173-201A and the analytical method's minimum quantitation level.
For these reasons and in accordance with RCW 90.48.120(2) it is ordered that KG Investment Properties, LLC take the following actions. These actions are required at the location known as

Bellevue South, located at 200 116th Avenue NE, Bellevue, WA 98004. In the event of a permit transfer to another Permittee, compliance with this Administrative Order and the actions listed below is required.

KG Investment Properties, LLC must take the following actions to remain in compliance with NPDES Permit WAR306225:

- Install all pre-treatment and treatment systems prior to any discharge of dewatering water or contaminated construction stormwater to Sturtevant Creek.
- Capture, contain, and treat all contaminated dewatering or contaminated stormwater prior to discharge to the Sturtevant Creek.
- Use an Ecology-approved treatment system and media filtration to treat any dewatering water or stormwater comingled with dewatering water (dewatering water) or contaminated stormwater.
- All captured sediment from the treatment of the dewatering or contaminated stormwater must be transported to an approved disposal facility based on the level of contamination.
- Contaminated soils excavated during construction will be immediately hauled off-site without stock piling to an approved disposal facility based on the level of contamination. When it is not feasible to immediately haul soils offsite, the soils must be placed in a covered area to minimize contact with stormwater.
- The treatment system must have enough capacity to hold the treated dewatering water or stormwater until it has been tested to determine if any of the Indicator Levels listed in Table 1 have been exceeded. No dewatering water or stormwater may be discharge before it has been tested for the parameters listed in Table 1. If any of the Indicator Levels listed in Table 1 are exceeded, you must stop the discharge of treated dewatering water or contaminated stormwater to Sturtevant Creek, until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, KG Investment Properties, LLC shall install further Ecology-approved treatment systems or shall discharge to the Municipal Sewer under a separate agreement with the Municipality and provide notice to Ecology.
- Once the effectiveness of the treatment system has been determined, KG Investment Properties, LLC may revert to a flow-through treatment system after the minimum two sampling and testing events and upon written approval from Ecology. The flow-through treatment system design must be submitted to Ecology for review prior to use.
- If a flow-through treatment system is adopted, all dewatering water or contaminated stormwater must be sampled weekly while discharging and tested for the parameters listed in Table 1.
- When using a flow-through treatment system, if any of the Indicator Levels listed in Table 1 are exceeded, KG Investment Properties, LLC must stop the discharge of treated dewatering water or stormwater to Sturtevant Creek until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, KG Investment Properties, LLC shall modify the existing flow-through treatment system to increase its effectiveness or install an Ecology-approved treatment system or truck the contaminated stormwater or groundwater off-site for disposal in an approved manner.

- All dewatering water or contaminated stormwater must be batch sampled prior to discharging and tested for the parameters listed in Table 1. If any of the Indicator Levels listed in Table 1 are exceeded, you must stop the discharge of treated dewatering water or contaminated stormwater to the Sturtevant Creek, until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, KG Investment Properties, LLC shall install further Ecology-approved treatment systems or shall discharge to the Municipal Sewer under a separate agreement with the Municipality and provide notice to Ecology.
- Sampling for parameters listed in Table 1 must be reported on the required Discharge Monitoring Report (DMR) according to Permit conditions (S5.B Discharge Monitoring Reports).
- If sampling is conducted more frequently than required by this Order, the results of this monitoring must be included in the calculation and reporting of the data that is submitted in the Discharge Monitoring Reports (DMRs).
- Any discharge to waters of the state above the Indicator Levels for parameters listed in Table 1 must be immediately reported to the Department of Ecology.
- All monitoring data must be prepared by a laboratory registered or accredited under the provisions of, *Accreditation of Environmental Laboratories*, Chapter 137-50 WAC.
- All sampling data must be reported monthly on Discharge Monitoring Reports (DMRs) electronically using Ecology's secure online system WQWebDMR, in accordance to Permit Condition S5.B. If the measured concentration is below the detection level than KG Investment Properties, LLC shall report single analytical values below detection as "less than the detection level (DL)" by entering "<" followed by the numeric value of the detection level (e.g. "<0.1"). All other values above DL must be reported as the numeric value.
- Noncompliance with permit requirements or the provisions of this Order must be immediately reported to the Northwest Regional Office of the Department of Ecology in accordance with Permit Condition S5.F, Noncompliance Notification.
- The Stormwater Pollution Prevention Plan (SWPPP) prepared for KG Investment Properties, LLC shall be fully implemented and amended as needed for the duration of the project.
- If a modification of the Order is desired, a written request shall be submitted to Ecology and if approved, Ecology will issue an amendment to this Order.

Ecology retains the right to make modifications to this Order through supplemental Order, or amendment to this Order, it if appears necessary to further protect the public interest.

This Order does not exempt KG Investment Properties, LLC from any Construction Stormwater General Permit requirement.

Table 1.

KG Investment Properties, LLC must use the specified analytical methods, detection limits (DLs), and quantitation levels (QLs) in the following table for monitoring unless the method used produces measurable results in the sample and EPA has listed it as an EPA-approved method in 40 CFR Part 136. If the KG Investment Properties, LLC uses an alternative method, not specified in the order and as allowed above, it must report the test method, DL, and QL on the Discharge Monitoring Report. Sampling must be conducted on a batch basis prior to release. If a flow through system is approved, sampling must be done weekly.

Pollutant & CAS No. (if available)	Sampling Frequency	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L	Quantitation Level, µg/L
PETROLEUM HYDROCARBONS						
BTEX (benzene, toluene, ethylbezene and O,M,P xylenes)	Batch	Grab	2.0 [a]	SW 846 8021/ 8260	1.0	2.0
Diesel and Oil-Range Hydrocarbons (NWTPH-Dx) [b]	Batch	Grab	250 [a]	NWTPH-Dx	250	250
VOLATILE ORGANIC COMPOUNDS (VOCs)						
1,3,5 –Trimethylbenzene (108-67-8)	Batch	Grab	5.0 [a]	8260	5.0	5.0
1,2,4 –Trimethylbenzene (95-63-6)	Batch	Grab	5.0 [a]	8260	5.0	5.0
1,2-Dichlorobenzene (95-50-1)	Batch	Grab	1.9 [a]	624	1.9	7.6
Cis-1,2-Dichloroethene (156-59-2)	Batch	Grab	5.0 [a]	8260	5.0	5.0
n-propylbenzene (103-65-1)	Batch	Grab	5.0 [a]	8260	5.0	5.0
POLYCYCLIC AROMATIC HYDROCARBONS (PAH)						
Naphthalene (91-20-3)	Batch	Grab	0.6 [a]	625	0.3	0.6
Construction Stormwater General Permit Benchmarks						
Parameter				**Benchmark**		**Analytical Method**
Turbidity	Weekly	Grab		25 NTU		SM2130 [c]
pH	Weekly	Grab		6.5 - 8.5 SU		SM4500-H^+ B

[a] No surface water standard, value is laboratory quantitation level.

[b] NWTPH-Dx = Northwest Total Petroleum Hydrocarbons – Semi-volatile (“diesel”) for diesel range organics and heavy oils (includes jet fuels, kerosene, diesel-oils, hydraulic fluids, mineral oils, lubricating oils, and fuel oils).

[c] Or equivalent.

FAILURE TO COMPLY WITH THIS ORDER

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form – by mail or in person (see addresses below). Email is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320.

ADDRESS AND LOCATION INFORMATION

Street Addresses	**Mailing Addresses**
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503 **Pollution Control Hearings Board** 1111 Israel Road SW Suite 301 Tumwater, WA 98501	**Department of Ecology** Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608 **Pollution Control Hearings Board** PO Box 40903 Olympia, WA 98504-0903

CONTACT INFORMATION

Please direct all questions about this Order to:

Evan Dobrowski
WA State Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Phone: (425) 649 – 7276
Email: edob461@ecy.wa.gov

MORE INFORMATION

- **Pollution Control Hearings Board Website:** www.eho.wa.gov/Boards_PCHB.aspx
- **Chapter 43.21B RCW – Environmental Hearings Office – Pollution Control Hearings Board:** http://apps.leg.wa.gov/RCW/default.aspz?cite=43.21B
- **Chapter 371-08 WAC – Practice and Procedure:** http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08
- **Chapter 34.05 RCW – Administrative Procedure Act:** http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05
- **Laws:** www.ecy.wa.gov/laws-rules/ecyrcw.html
- **Rules:** www.ecy.wa.gov/laws-rules/ecywac.html

SIGNATURE

Rachel McCrea
Water Quality Section Manager
Northwest Regional Office
Washington State Department of Ecology

Date

From:	Dobrowski, Evan (ECY)
To:	Doan, Brian
Cc:	Helland, Greg
Subject:	RE: Bellevue South Project AO
Date:	Thursday, April 26, 2018 3:09:21 PM

Brian your recap looks good.

Evan Dobrowski | Stormwater Inspector and Compliance Specialist
Washington State Department of Ecology | Water Quality Program
Northwest Regional Office | 3190 160th Avenue Southeast, Bellevue, WA 98008-5452
p: (425) 649-7276 | **e:** edob461@ecy.wa.gov | **www.ecy.wa.gov**

From: Doan, Brian [mailto:BDoan@SCSEngineers.com]
Sent: Thursday, April 26, 2018 1:56 PM
To: Dobrowski, Evan (ECY) <EDOB461@ECY.WA.GOV>
Cc: Helland, Greg <GHelland@scsengineers.com>
Subject: RE: Bellevue South Project AO

Evan,
Further to our phone conversation today, can you please review and comment on the following paraphrasing of Ecology interpretation and approach to this type of administrative order?
The AO applies to the entire property, unless the following are established:

- Data are available defining the contaminated area, and the contaminated area is shown on a site plan.
- The contaminated area is demarcated on the ground, and stormwater from this area is well segregated from stormwater from other areas at the property, such that stormwater from the contaminated area cannot mingle with other stormwater at the property.
- If dewatering is occurring, dewatering water would need to managed as contaminated unless results from hydrogeologic testing (draw-down test or pumping test) show that dewatering outside the contaminated area will not draw out contaminated groundwater.

If the above approach is implemented, the AO applies only to the stormwater from the contaminated area, and stormwater from other areas of the property can be managed like a normal construction site, testing only for turbidity and pH. Similarly, if remediation data indicate that cleanup is complete, stormwater can be managed like a normal construction site.
Did I capture that accurately? Thanks.

Brian Doan, CSP
SCS Engineers
2405 140th Ave NE, #107
Bellevue, WA 98005

425-289-5445 direct
425-766-2487 cell

From: Doan, Brian
Sent: Thursday, April 26, 2018 9:22 AM
To: 'Dobrowski, Evan (ECY)' <EDOB461@ECY.WA.GOV>
Cc: Helland, Greg (GHelland@scsengineers.com) <GHelland@scsengineers.com>; Adlington, Samuel <SAdlington@scsengineers.com>
Subject: RE: Bellevue South Project AO

Evan,
Following up on my voice mail message left yesterday, can you please verify that batch samples meeting chemical indicator parameters (Table 1) prior to treatment are okay to discharge, treating only for pH and turbidity without further sampling after treatment. Thank you.

Brian Doan, CSP
SCS Engineers
2405 140th Ave NE, #107
Bellevue, WA 98005
425-289-5445 direct
425-766-2487 cell

From: Dobrowski, Evan (ECY) <EDOB461@ECY.WA.GOV>
Sent: Thursday, April 19, 2018 4:34 PM
To: Doan, Brian <BDoan@SCSEngineers.com>
Subject: Bellevue South Project AO

Hello Bryan,

Thank you for talking with me about this AO and I hope I cleared up the confusion. The AO is attached to this e-mail.

Feel free to contact me with any questions.

Evan Dobrowski | Stormwater Inspector and Compliance Specialist
Washington State Department of Ecology | Water Quality Program
Northwest Regional Office | 3190 160th Avenue Southeast, Bellevue, WA 98008-5452
p: (425) 649-7276 | **e:** edob461@ecy.wa.gov | **www.ecy.wa.gov**