STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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July 19, 2018

Mr. Jimmy Blais
Merlino Properties
5050 First Avenue South, Suite 102
Seattle, WA 98134

Re: Opinion on Proposed Cleanup of the following Site:

- **Site Name:** Stoneway Concrete Renton
- **Site Address:** 1915 Maple Valley Hwy, Renton, WA 98055
- **Facility/Site No.:** 62244377
- **VCP Project No.:** NW1702
- **Cleanup Site No.:** 2121

Dear Mr. Blais:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Stoneway Concrete Renton facility (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

Upon completion of the proposed cleanup, will further remedial action likely be necessary to clean up contamination at the Site?

NO. Ecology has determined that, upon completion of your proposed cleanup, no further remedial action will likely be 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. The Site is defined by the nature and extent of contamination associated with the following releases:

- Gasoline-, diesel-, and oil-range petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O), and formaldehyde into Soil.
- Formaldehyde, arsenic, and highly alkaline pH into Ground Water.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

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 documents listed in **Enclosure B**. Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by completing a Request for Public Record form (https://www.ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests) and emailing it to PublicRecordsOfficer@ecy.wa.gov, or contacting the Public Records Officer at 360-407-6040. A number of these documents are accessible in electronic form from the Site web page (https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=2121).

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, upon completion of your proposed cleanup, **no further remedial action** will likely be necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A.**

The lateral and vertical extent of soil and ground water impacted by contaminant releases at the Site have been adequately defined by completion of Site investigations conducted from September 1998 through July 2017. Also, the additional analysis provided in the March 7, 2018 "*Request for Written Opinion, Focused Feasibility Study and Disproportionate Cost Analysis*" addressed the Site characterization data gaps cited in the August 31, 2017 "*Further Action Opinion Letter*" from Ecology.

Electronic submittal of all sampling data into Ecology's electronic Environmental Information Management (EIM) database is a requirement in order to receive a NFA opinion from Ecology for this Site. EIM guidance can be found on the following Ecology web page: https://ecology.wa.gov/Research-Data/Data-resources/Environmental-Information-Management-database . Erica Fot (email Efot461@ecy.wa.gov, telephone 360-407-6692) is Ecology's contact and resource on entering data into EIM.

2. Establishment of cleanup standards.

Soil

Cleanup Levels: The proposed future use of the Site (residential) does not meet the MTCA definition of an industrial property; therefore, soil cleanup levels suitable for unrestricted land use are appropriate. Soil cleanup levels based on protection of ground water are appropriate. The MTCA Method A cleanup levels (TPH-G, TPH-D, and TPH-O) and Method B cleanup levels (formaldehyde) are considered appropriate for soil at the Site and are protective of human health and the environment.

Soil cleanup levels protective of terrestrial ecological receptors are not necessary because the Site meets the Terrestrial Ecological Evaluation (TEE) exclusion criteria (MTCA WAC 173-340-7491). The results of the TEE Evaluation Form worksheet indicated that a TEE exclusion is applicable and that protective cleanup levels based on TEE factors are not required for this Site.

Point of Compliance: For soil cleanup levels based on the protection of ground water, the point of compliance is defined as Site-wide throughout the soil profile and may extend below the water table. This is the appropriate point of compliance for the Site.

Soil Vapor

Formaldehyde in soil vapor was evaluated as a potential vapor intrusion (VI) issue, based on detections of this chemical in soil vapor samples conducted at the Site in 2016. This soil vapor sampling occurred after completion of the on-site removal and in-situ treatment of formaldehyde-contaminated soil in 2010 (see **Enclosure A**), after confirmation soil and ground water sampling showed concentrations below the Method B cleanup levels. Formaldehyde does not have soil or ground water VI screening levels in the current Ecology VI guidance. Based on this information and data, soil vapor was eliminated as a contaminated media for this Site.

Ground Water

Cleanup Levels: MTCA Method A cleanup levels for arsenic and formaldehyde are the applicable ground water cleanup levels for this Site. A ground water cleanup level for pH does not exist; however, the maximum reported pH value in Site ground water (12.54) was above the characteristic dangerous waste threshold of 12.5; therefore, pH is considered to be a water quality parameter of concern at the Site.

Point of Compliance: Ecology has determined the conditional point of compliance proposed for ground water at the Site (western Property boundary) is appropriate for the Site, given the following:

- Data documenting a consistent ground water flow direction away from the Cedar River to the northwest has been provided to Ecology, and

- It is not practicable to meet the cleanup level for arsenic and an acceptable concentration of pH in ground water throughout the Site within a reasonable restoration time frame, per WAC 173-340(8)(c), due to presence of high pH soils in inaccessible Site areas.

3. Selection of cleanup action.

Ecology has determined the cleanup action you proposed for the Site meets the substantive requirements of MTCA. The focused feasibility study and disproportionate cost analysis (Farallon Consulting 2018) documented the rationale for accepting the interim cleanup actions as the final cleanup action. Interim cleanup actions completed to date at the Site are summarized in **Enclosure A**.

The FS and DCA conclude that an environmental covenant (EC) will be required to support a No Further Action determination for the Site, and Ecology concurs. The environmental covenant will include an operation and maintenance (O&M) plan and a confirmational monitoring plan.

In order to adequately monitor ground water along the western property boundary (conditional point of compliance), Ecology will require installation of an additional downgradient monitoring well, between existing monitoring wells MW-1 and EPI-MW-1. Monitoring of ground water at this point of compliance is especially important because the Site is located within the 1-year time-of-travel wellhead protection zone of City of Renton water supply Well 8 and Well 9. These water wells are located approximately 700 to 800 feet west of the western Property boundary.

Links to Ecology guidance regarding environmental covenants can be found on our web site: https://fortress.wa.gov/ecy/publications/SummaryPages/1509054.html .

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable 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 proposed will be substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

4. 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).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). As

you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process/Cleanup-options/Voluntary-cleanup-program . If you have any questions about this opinion, please contact me by phone at 425-649-7257 or e-mail at michael.warfel@ecy.wa.gov.

Sincerely,

Michael R. Warfel

Michael R. Warfel, Site Manager
NWRO Toxics Cleanup Program

Enclosures (2): A – Description and Diagrams of the Site
B – Basis for the Opinion: List of Documents

cc: Riley Conkin, Farallon Consulting, LLC (via email)
Katie Nolan, City of Renton Water Utility (via email)
Sonia Fernandez, Ecology VCP Coordinator, NWRO (via email)

Enclosure A

Description and Diagrams of the Site

Site Description

This section provides Ecology's understanding and interpretation of Site conditions, and is the basis for the opinions expressed in the body of this letter.

Site: Stoneway Concrete is located on King County parcel 1723059026 (the Property), which occupies 12.54 acres situated between the Cedar River and SE Maple Valley Highway (**Figure 1**). The Site boundaries generally follow the Property boundaries.

Site History and Current Use: Historical records indicate that the Property was developed in the 1930s as Stoneway Dock Company. The facility name changed to Stoneway Sand and Gravel in the 1950s. During the 1950s and 1960s, the Property was reportedly leased by many businesses, including an asphalt manufacturing company. By 1966, the Property was owned and operated by Stoneway Concrete and in 1985 was purchased by Don Merlino.

The Property was most recently occupied by a concrete batch plant, along with associated support activities (**Figure 2**). Operations on the Property ceased prior to October 2002 in order to conform with the City of Renton aquifer protection ordinance, which precludes industrial activities that use, handle, or store hazardous substances in Aquifer Protection Area Zone 1.

Sources of Contamination: Petroleum hydrocarbons were detected in soil due to historic surface spillage and historic releases from underground storage tanks that have been removed. Formaldehyde in soil and ground water is attributed to spills of a chemical additive associated with the concrete batch process. Arsenic, detected in ground water above the cleanup level, was not found in soil at concentrations exceeding natural background concentrations.

Physiographic Setting: The Site is relatively flat and slopes from an elevation of 50 feet above mean sea level (amsl) adjacent to State Route 169 on the north to 40 feet amsl at the Cedar River on the south. The Cedar River valley is very narrow in the Site vicinity and is bounded on the north and south by steep valley walls that attain elevations of 300 to 400 feet amsl.

Surface/Storm Water System: The majority of the Property is currently paved with concrete that is 4 - 12 inches thick. Unpaved areas are located in the eastern and western portions of the Property. Storm sewer control is in place in the upper portion of the Property and the Property has a storm water permit. Storm water in the lower portion of the Property drains to on-site settlement ponds for infiltration. There are no point source discharges to the Cedar River.

Ecological Setting: Most of the Property's river frontage is protected with erosion control features such as riprap, cast-in-place concrete walls, "Ecology" blocks, and a poured concrete veneer over the native soils. Very little of the original low bank frontage remains and there does not appear to be a riparian habitat on the Property.

Geology: The Site is underlain by coarse sands and gravels deposited in the valley of the Cedar River. The Cedar River valley is very narrow in the Site vicinity and is bounded by steep-sided

valley walls comprised of glacial till overlying bedrock. The surface of the Site has been graded over time and includes varying thicknesses of fill. The sand and gravel alluvium has been observed in borings to a depth of 50 feet below ground surface (bgs), the deepest exploration on the Site.

Ground Water: Ground water occurs under unconfined conditions in the sand and gravel alluvium beneath the Site, in the regional, USEPA-designated Sole Source Cedar Valley Aquifer. The City of Renton obtains the majority of the water supply from well fields in this aquifer, located upstream and downstream from the Site. Local well logs indicate that this aquifer extends to depths up to 72 feet bgs near the Site.

Depths to ground water at the Site range from 10 to 20 feet bgs. Data from detailed studies of the aquifer by the City of Renton, and monitoring wells on the Site, confirm a consistent northwesterly flow direction across the Site, away from the Cedar River. This reach of the Cedar River loses a significant volume of surface water through the riverbed into the aquifer, resulting in the down-valley ground water gradient to the northwest. Aquifer tests conducted in the City of Renton wellfield (located within 700 feet northwest of the western Property boundary) document that this prevailing ground water flow direction is not measurably affected by pumpage in the well field.

Extent of Contamination and Remedial Actions: From 2005 through 2010, numerous remedial actions regarding soil contamination have taken place at the Property (Figure 5), which are summarized as follows:

- Work Area 1- Former Small Settling Pond (southwest corner of Property). High pH soil was present in this area. At total of 200 cubic yards was removed to a depth of 6 feet, with the southwest area excavated to 8 feet. Sixteen performance samples indicated pH at limits of excavation (sidewalls and floor) was 6.0-8.0.

- Work Area 2 - Large Settling Ponds. The settling ponds are concrete lined and approximately 15 feet deep. Approximately 2,200 cubic yards of high pH soil were removed from within the settling ponds. Excavation was completed when the concrete sidewalls and bottom were exposed. Because the Site was excavated to concrete, no performance samples were collected. A small amount of high pH soil may remain below and around the concrete settling ponds. Removing this material would involve excavating in and adjacent to the Cedar River, which may pose a risk to salmon spawning habitat and erosion of the bulkheads.

- Work Area 3 - Shallow Petroleum Impacted Area. COCs for this area were TPHo and TPHd. Impacted soil in this area was excavated to a depth of 4 feet. Approximately 190 cubic yards of TPHo contaminated soil were removed. Twelve performance samples indicated TPHo and TPHd were below cleanup levels (ranging from less than detection limits to 410 mg/kg).

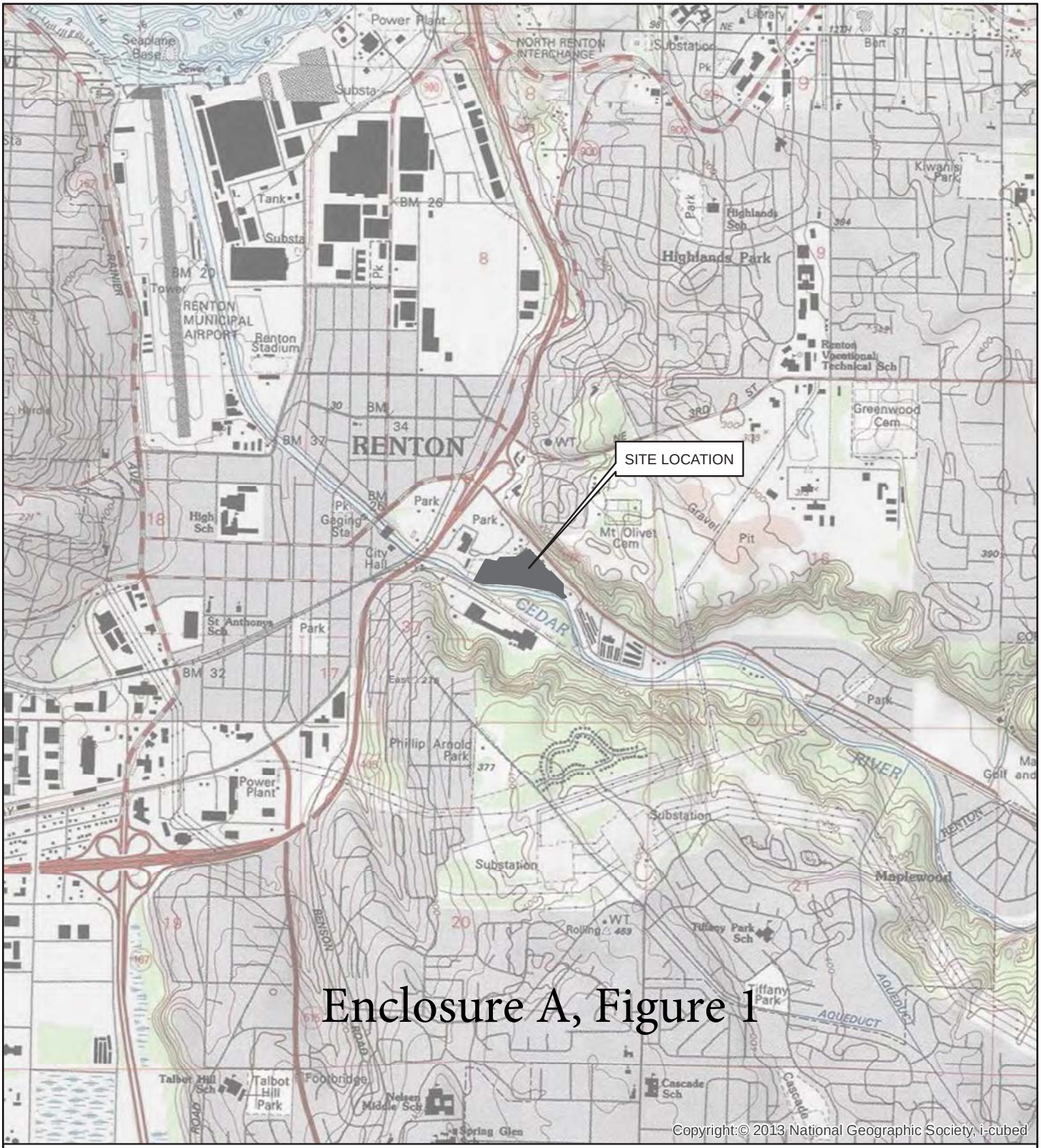
- Work Area 4 - Formaldehyde Impacted Area. This area is the largest on the Site and covers a major portion of the central area of the Property. The final size of this area at the completion of soil excavation was 1.4 acres. The depth of excavation was to approximately 11 feet bgs. Approximately 21,000 cubic yards of material were excavated from the area, of which 13,000 cubic yards were bioremediated on-Site and the remainder disposed off-Site.

  Performance samples were collected and areas over excavated if a performance sample was above the formaldehyde cleanup level. A total of 447 performance samples were collected and analyzed from this area, with 238 samples representing final performance samples. All final performance samples were below the cleanup level.

- Work Area 5 - Heating oil UST. A 600-gallon UST was removed from this area. 300 cubic yards were removed from this area (24 feet x 24 feet) to a depth of 23 feet bgs. During the remediation effort, approximately 3,000 gallons of water that accumulated in the pit was removed. Eleven performance samples were collected. Only one of the performance samples was above analytical detection levels, but below the cleanup level. TPHd levels in the water that accumulated in the pit were 320 µg/L, below the ground water cleanup level.

Concentrations of COCs in ground water are shown on **Figure 5**. As mentioned in the text of this opinion letter, the present status of formaldehyde in ground water cannot be assessed, because the laboratory detection limits for the most recent sampling events were greater than the cleanup level of 5 µg/L. Elevated pH has been observed in monitoring well MW-10 since January 2012 (ranging from 11.02 to 12.54).

Site Diagrams



Copyright:© 2013 National Geographic Society, i-cubed

Enclosure A, Figure 1

REFERENCE: 7.5 MINUTE USGS QUADRANGLE RENTON, WASHINGTON, DATED 2011

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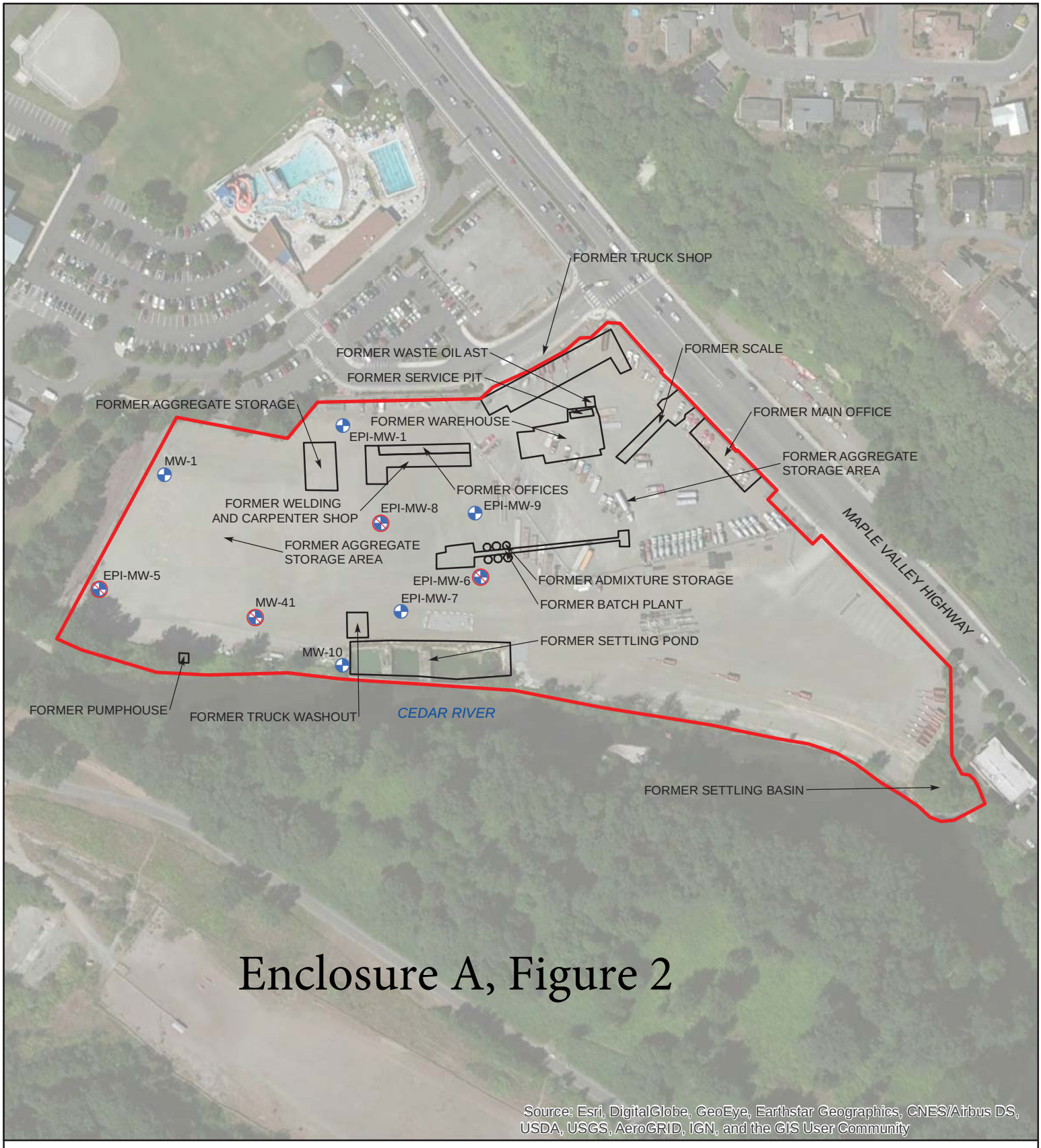
FIGURE 1

SITE VICINITY MAP
OLD STONEWAY CONCRETE SITE
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

Drawn By: pemahiser | Checked By: JR | Date: 4/13/2017 | Disc Reference:

Document Path: Q:\Projects\266 Gary Merlino\008 Old Stoneway\FIGURE 1_SITE VICINITY MAP.mxd



Enclosure A, Figure 2

LEGEND

- MONITORING WELL (INSTALLED BY EPI AND OTHERS)
- ABANDONED MONITORING WELL
- APPROXIMATE SITE BOUNDARY
- HISTORIC SITE FEATURES

0 200
SCALE IN FEET

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FIGURE 2

SITE PLAN
OLD STONEWAY CONCRETE SITE
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

Drawn By: pemahiser Checked By: JR Date: 4/13/2017 Disc Reference:
Document Path: Q:\Projects\266 Gary Merlino\008 Old Stoneway\FIGURE 2_SITE PLAN.mxd

LEGEND

- APPROXIMATE SITE BOUNDARY
- MONITORING WELL (INSTALLED BY EPI AND OTHERS)
- ABANDONED MONITORING WELL
- 29.50 — GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
- GROUNDWATER FLOW DIRECTION
- (28.38) GROUNDWATER ELEVATION (9/15/16) MEASURED IN FEET ABOVE MEAN SEA LEVEL RELATIVE TO NORTH AMERICAN VERTICAL DATUM 1988 (MONITORING WELL SURVEY DATA PROVIDED BY ENVIRONMENTAL PARTNERS INC.)
- (NC) GROUNDWATER ELEVATION NOT CALCULATED. MONITORING WELL SURVEY DATA WAS NOT AVAILABLE

N

0 60

SCALE IN FEET

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FIGURE 3

GROUNDWATER ELEVATION CONTOURS AND FLOW DIRECTION FOR SEPTEMBER 15, 2016
OLD STONEWAY CONCRETE SITE
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

Drawn By: pemahiser | Checked By: JR | Date: 4/13/2017 | Disc Reference:

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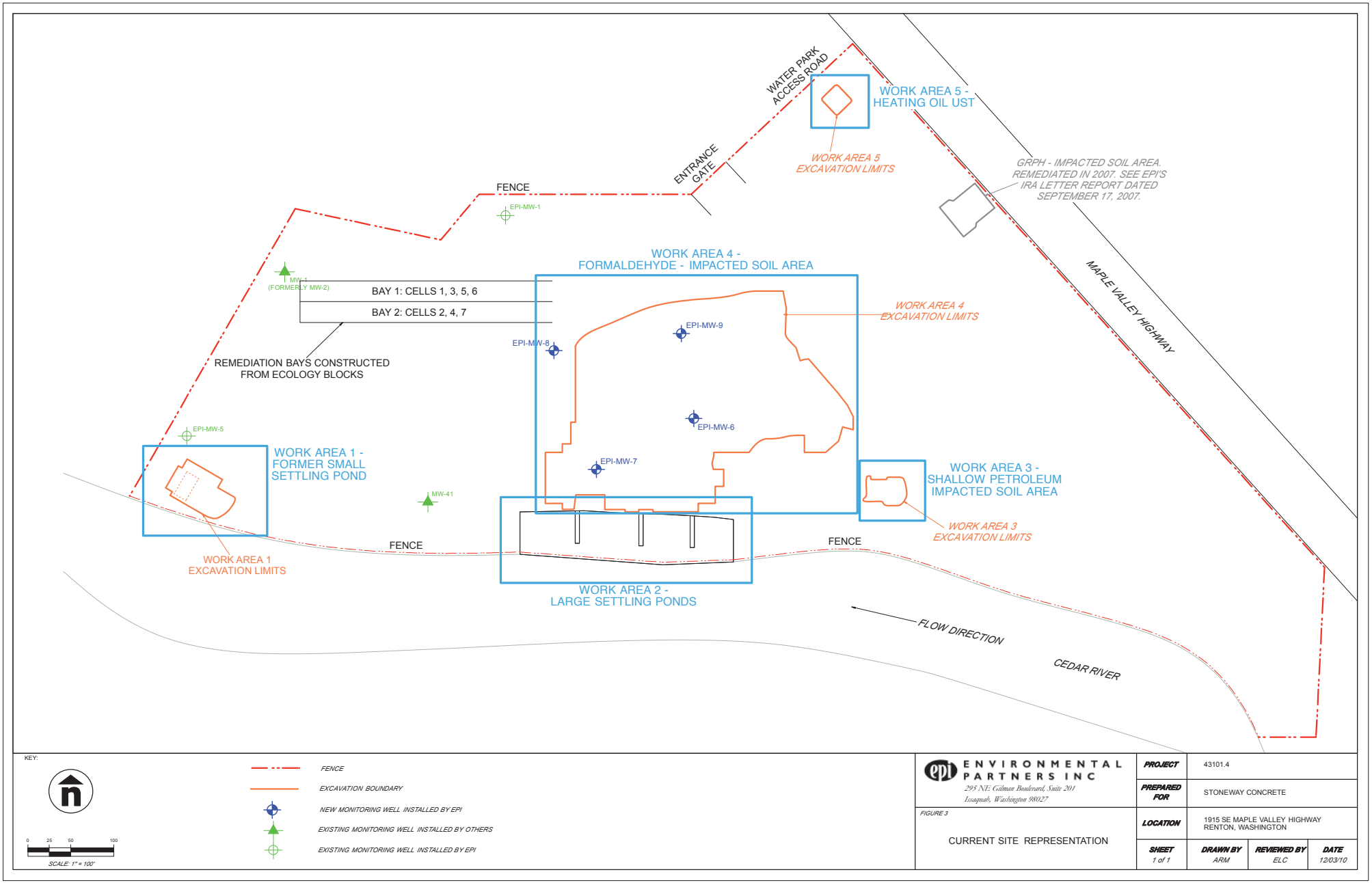
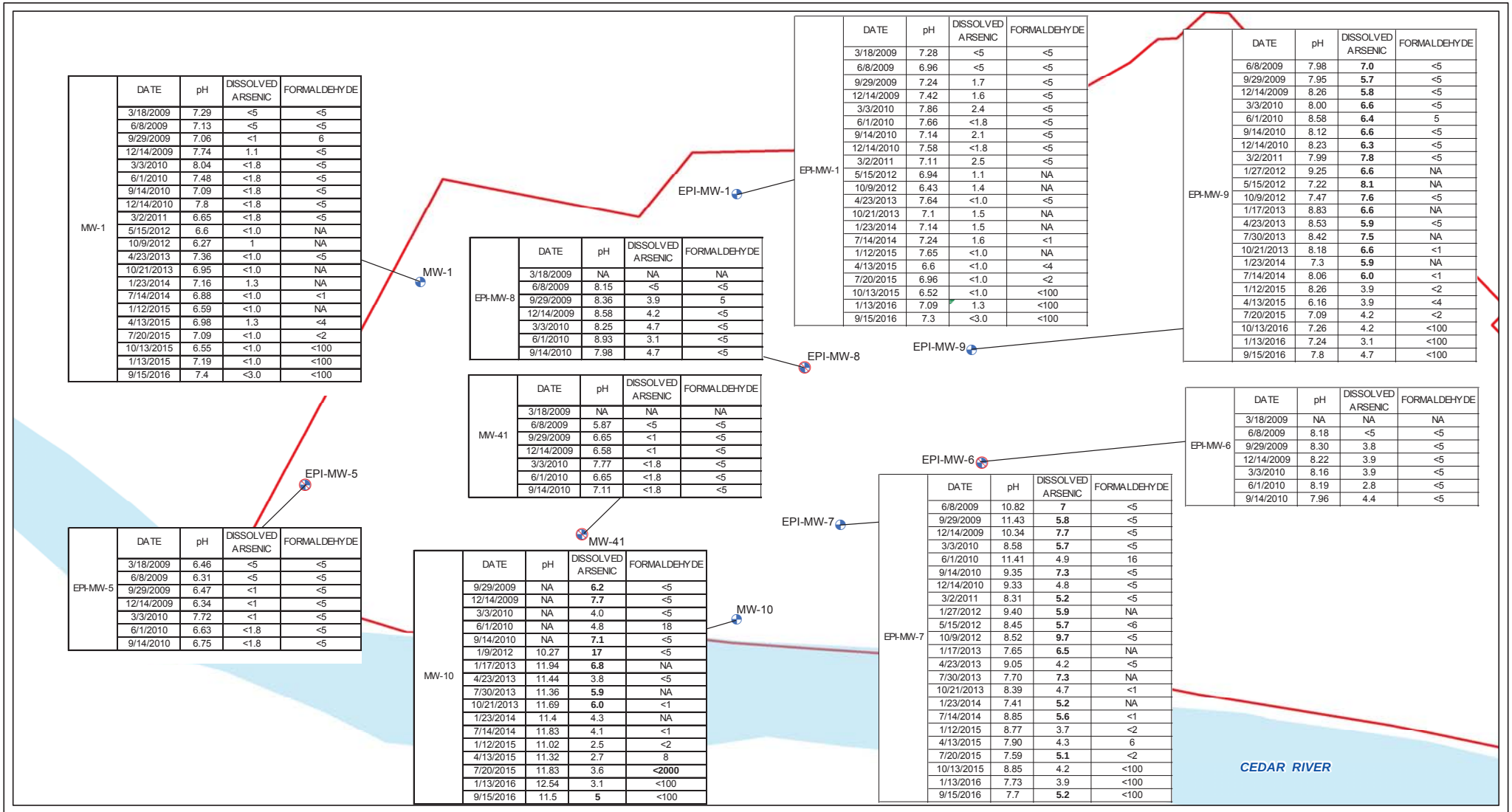
Enclosure A, Figure 3



Enclosure A, Figure 4



MW-1	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	3/18/2009	7.29	<5	<5
	6/8/2009	7.13	<5	<5
	9/29/2009	7.06	<1	6
	12/14/2009	7.74	1.1	<5
	3/3/2010	8.04	<1.8	<5
	6/1/2010	7.48	<1.8	<5
	9/14/2010	7.09	<1.8	<5
	12/14/2010	7.8	<1.8	<5
	3/2/2011	6.65	<1.8	<5
	5/15/2012	6.6	<1.0	NA
	10/9/2012	6.27	1	NA
	4/23/2013	7.36	<1.0	<5
	10/21/2013	6.95	<1.0	NA
	1/23/2014	7.16	1.3	NA
	7/14/2014	6.88	<1.0	<1
	1/12/2015	6.59	<1.0	NA
	4/13/2015	6.98	1.3	<4
	7/20/2015	7.09	<1.0	<2
	10/13/2015	6.55	<1.0	<100
	1/13/2015	7.19	<1.0	<100
	9/15/2016	7.4	<3.0	<100

EPI-MW-1	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	3/18/2009	7.28	<5	<5
	6/8/2009	6.96	<5	<5
	9/29/2009	7.24	1.7	<5
	12/14/2009	7.42	1.6	<5
	3/3/2010	7.86	2.4	<5
	6/1/2010	7.66	<1.8	<5
	9/14/2010	7.14	2.1	<5
	12/14/2010	7.58	<1.8	<5
	3/2/2011	7.11	2.5	<5
	5/15/2012	6.94	1.1	NA
	10/9/2012	6.43	1.4	NA
	4/23/2013	7.64	<1.0	<5
	10/21/2013	7.1	1.5	NA
	1/23/2014	7.14	1.5	NA
	7/14/2014	7.24	1.6	<1
	1/12/2015	7.65	<1.0	NA
	4/13/2015	6.6	<1.0	<4
	7/20/2015	6.96	<1.0	<2
	10/13/2015	6.52	<1.0	<100
	1/13/2016	7.09	1.3	<100
	9/15/2016	7.3	<3.0	<100

EPI-MW-9	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	6/8/2009	7.98	**7.0**	<5
	9/29/2009	7.95	**5.7**	<5
	12/14/2009	8.26	**5.8**	<5
	3/3/2010	8.00	**6.6**	<5
	6/1/2010	8.58	**6.4**	5
	9/14/2010	8.12	**6.6**	<5
	12/14/2010	8.23	**6.3**	<5
	3/2/2011	7.99	**7.8**	<5
	1/27/2012	9.25	**6.6**	NA
	5/15/2012	7.22	**8.1**	NA
	10/9/2012	7.47	**7.6**	<5
	1/17/2013	8.83	**6.6**	NA
	4/23/2013	8.53	**5.9**	<5
	7/30/2013	8.42	**7.5**	NA
	10/21/2013	8.18	**6.6**	<1
	1/23/2014	7.3	**5.9**	NA
	7/14/2014	8.06	**6.0**	<1
	1/12/2015	8.26	3.9	<2
	4/13/2015	6.16	3.9	<4
	7/20/2015	7.09	4.2	<2
	10/13/2016	7.26	4.2	<100
	1/13/2016	7.24	3.1	<100
	9/15/2016	7.8	4.7	<100

EPI-MW-8	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	3/18/2009	NA	NA	NA
	6/8/2009	8.15	<5	<5
	9/29/2009	8.36	3.9	5
	12/14/2009	8.58	4.2	<5
	3/3/2010	8.25	4.7	<5
	6/1/2010	8.93	3.1	<5
	9/14/2010	7.98	4.7	<5

MW-41	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	3/18/2009	NA	NA	NA
	6/8/2009	5.87	<5	<5
	9/29/2009	6.65	<1	<5
	12/14/2009	6.58	<1	<5
	3/3/2010	7.77	<1.8	<5
	6/1/2010	6.65	<1.8	<5
	9/14/2010	7.11	<1.8	<5

EPI-MW-6	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	3/18/2009	NA	NA	NA
	6/8/2009	8.18	<5	<5
	9/29/2009	8.30	3.8	<5
	12/14/2009	8.22	3.9	<5
	3/3/2010	8.16	3.9	<5
	6/1/2010	8.19	2.8	<5
	9/14/2010	7.96	4.4	<5

EPI-MW-7	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	6/8/2009	10.82	**7**	<5
	9/29/2009	11.43	**5.8**	<5
	12/14/2009	10.34	**7.7**	<5
	3/3/2010	8.58	**5.7**	<5
	6/1/2010	11.41	4.9	16
	9/14/2010	9.35	**7.3**	<5
	12/14/2010	9.33	4.8	<5
	3/2/2011	8.31	**5.2**	<5
	1/27/2012	9.40	**5.9**	NA
	5/15/2012	8.45	**5.7**	<6
	10/9/2012	8.52	**9.7**	<5
	1/17/2013	7.65	**6.5**	NA
	4/23/2013	9.05	4.2	<5
	7/30/2013	7.70	**7.3**	NA
	10/21/2013	8.39	4.7	<1
	1/23/2014	7.41	**5.2**	NA
	7/14/2014	8.85	**5.6**	<1
	1/12/2015	8.77	3.7	<2
	4/13/2015	7.90	4.3	6
	7/20/2015	7.59	**5.1**	<2
	10/13/2015	8.85	4.2	<100
	1/13/2016	7.73	3.9	<100
	9/15/2016	7.7	**5.2**	<100

EPI-MW-5	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	3/18/2009	6.46	<5	<5
	6/8/2009	6.31	<5	<5
	9/29/2009	6.47	<1	<5
	12/14/2009	6.34	<1	<5
	3/3/2010	7.72	<1	<5
	6/1/2010	6.63	<1.8	<5
	9/14/2010	6.75	<1.8	<5

MW-10	DATE	pH	DISSOLVED ARSENIC	FORMALDEHYDE
	9/29/2009	NA	**6.2**	<5
	12/14/2009	NA	**7.7**	<5
	3/3/2010	NA	4.0	<5
	6/1/2010	NA	4.8	18
	9/14/2010	NA	**7.1**	<5
	1/9/2012	10.27	**17**	<5
	1/17/2013	11.94	**6.8**	NA
	4/23/2013	11.44	3.8	<5
	7/30/2013	11.36	**5.9**	NA
	10/21/2013	11.69	**6.0**	<1
	1/23/2014	11.4	4.3	NA
	7/14/2014	11.83	4.1	<1
	1/12/2015	11.02	2.5	<2
	4/13/2015	11.32	2.7	8
	7/20/2015	11.83	3.6	**<2000**
	1/13/2016	12.54	3.1	<100
	9/15/2016	11.5	**5**	<100

LEGEND

- APPROXIMATE SITE BOUNDARY
- MONITORING WELL (INSTALLED BY EPI AND OTHERS)
- ABANDONED MONITORING WELL

NOTES:
DISSOLVED ARSENIC AND FORMALDEHYDE UNITS ARE IN MICROGRAMS PER LITER (µg/L)
pH AT 25 DEGREES CELSIUS

BOLD = DENOTES CONCENTRATIONS THAT EXCEED MODEL TOXICS CONTROL ACT (MTCA) CLEANUP LEVEL.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTED LIMIT LISTED.
NA = NOT APPLICABLE

N

0 80
SCALE IN FEET

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FIGURE 4

GROUNDWATER ANALYTICAL RESULTS
OLD STONEWAY CONCRETE SITE
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

Drawn By: shaynes Checked By: JR Date: 4/13/2017 Disc Reference:
Document Path: Q:\Projects\266 Gary Merlino\008 Old Stoneway\Figure 4_gwAnalyticalData_pee.mxd

Enclosure A, Figure 5

Enclosure B

Basis for the Opinion:
List of Documents

1. March 7, 2018. Request for Written Opinion, Focused Feasibility Study and Disproportionate Cost Analysis, Old Stoneway Renton Property, 1915 Southeast Maple Valley Highway, Renton, Washington, VCP Project No. NW1702. Farallon Consulting.

2. August 31, 2017. Further Action Opinion Letter, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, VCP NW1702. Washington State Department of Ecology.

3. April 13, 2017. Cleanup Status and Permanent Cleanup Action, Old Stoneway Renton Property, 1915 Southeast Maple Valley Highway, Renton, WA. Farallon Consulting.

4. August 11, 2015. Cleanup Status, Former Stoneway Concrete Batch Plant, 1915 SE Maple Valley Highway, Renton, Washington. Environmental Partners, Inc.

5. December 29, 2011. Further Action Opinion Letter, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, VCP NW1702. Washington State Department of Ecology.

6. October 12, 2011. Interim Action Report Volume 1, Former Stoneway Batch Plant, 1915 SE Maple Valley Highway, Renton Washington, WA. Environmental Partners, Inc.

7. May 9, 2011. Further Action Opinion Letter on Interim Action Report, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, VCP NW1702. Washington State Department of Ecology.

8. February 7, 2011. Interim Action Report, Volumes 1 and 2, Former Stoneway Batch plant, 1915 SE Maple Valley Highway, Renton Washington, WA. Environmental Partners, Inc.

9. April 30, 2009. Opinion on Proposed Cleanup of the following Site: Former Stoneway Batch Plant, 1915 SE Maple Valley Highway, Renton Washington, WA, VCP NW1702. Washington State Department of Ecology.

10. March 9, 2009. Cleanup Action Plan, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, Environmental Partners, Inc.

11. October 30, 2007. Ex Situ Soil Bioremediation Treatability Study, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, Environmental Partners, Inc.

12. September 17, 2007. Interim Remedial Action Letter Report, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, Environmental Partners, Inc.

13. May 5, 2006. Remedial Investigation Report, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA, Environmental Partners, Inc.

14. April 17, 2001. Department of Ecology Memorandum from Joanne Polayes to file. Discontinuation of groundwater monitoring for tetrachloroethene at Stoneway Concrete, Renton.

15. September 20, 1998. Final Report, Stoneway Tetrachloroethene (PCE) Assessment Renton, Washington. Pacific Groundwater Group.