



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 24, 2018

Mr. Michael Pollard
Seattle Land Use Company
2921 Eastlake Avenue East
Seattle, WA 98102

Re: Request for Additional Information to Provide Opinion on the Investigation and Cleanup under the VCP for the following Contaminated Site:

- **Site Name:** TD Auto Body & Repair
- **Site Address:** 1209 East Fir Street, Seattle, WA 98122
- **Cleanup Site ID:** 2666
- **Facility/Site ID:** 2501
- **VCP Project ID:** NW3194

Dear Mr. Michael Pollard:

Thank you for submitting the Phase I & Phase II Environmental Site Assessment and Off-site Environmental Site Assessment reports for review by the Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Based on a preliminary review, Ecology determined the report is incomplete. Additional information regarding the cleanup is needed. The enclosed Checklist identifies what additional information Ecology needs.

Ecology wants to provide you an opportunity to update and resubmit the report to include the additional information specified in the enclosed Checklist and any existing site characterization information available for the Site while you wait for a Site manager to be assigned. The Site's position on the VCP Wait List will remain the same. However; if an updated report is not received when a Site manager is assigned, the position in the Wait List cannot be guaranteed. By providing the requested information, Ecology can then provide a written opinion on the submitted reports.

When updating the report/s, please reference our report Template, available at <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Cleanup-report-checklists-and-templates>. Ecology developed both the Checklists and Template to provide clarity on our expectations for work plans and reports. We hope you find them useful.



Mr. Michael Pollard
July 24, 2018
Page 2

If you have any questions about this request or how to complete your report, please contact me at (425) 649-7097 or diane.escobedo@ecy.wa.gov. Thank you for your cooperation, and we look forward to working with you.

Sincerely,



Diane Escobedo
Toxics Cleanup Program, NWRO

Enclosure (1) RI Checklist

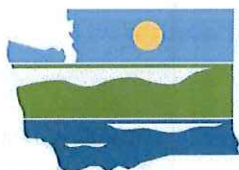
cc: Ecology Site File
Daniel Whitman, Whitman Environmental Sciences (e-mail)

Incomplete Report:

2018

Remedial Investigation Checklist TD Auto Body & Repair—NW3194

Toxics Cleanup Program



DEPARTMENT OF
ECOLOGY
State of Washington

May 2016

Publication No. 16-09-006

FOR ECOLOGY USE ONLY

FSID: 2501

Report Name: Phase I & II, Additional Off-Site Environmental Site Investigation

Date Submitted: 3/19/18

Reviewed By: D. Escobedo

Review Date: 7/23/18

Remedial Investigation (RI) Checklist Guidance

The Model Toxics Control Act (MTCA) regulation Washington Administrative Code (WAC) 173-340-350(7) broadly describes the elements necessary to complete a RI. The purpose of a RI is to collect and evaluate sufficient information to fully characterize the nature and extent of contamination at a site.

This RI checklist is considered guidance based on the MTCA cleanup regulation WAC 173-340. Cleanup project managers with the Washington State Department of Ecology (Ecology) have discretion when reviewing and accepting RI reports as site-specific circumstances dictate the necessary scope and breadth of each report.

Remedial Investigation Report Body

- I. Cover Letter.** Include a letter describing the submittal and specifying the desired department action or response.
- II. Introduction.**
 - a. **General Site Information.** Include contact information for project coordinators (Ecology site manager, consultants, potentially liable persons (PLP), and current owner/operator). Include the site name and identification numbers, general description, and location (e.g., GPS coordinates, assessor parcel number, Quarter Section Township Range, address).
 - b. **Site History.** Describe site from earliest known time of habitation and/or development. Describe previous owners/operators, past uses of the site, and all potential/known sources (both on-site and off-site) of contamination (e.g., petroleum storage tanks, manufacturing processes, chemical storage, etc.). Include approximate dates or periods of past product and waste spills, identification of the materials spilled, and amount/location of the spill.
 - c. **Site Use.** Describe current site uses, land use/zoning, and future use plans.
- III. Field Investigations**
 - a. **Previous Environmental Investigations.** Discuss prior work performed, samples obtained, why sampling locations were chosen, etc. Cite any previous environmental reports.
 - b. **Site Characterization.** Discuss current site characterization activities for each site media (surface water/sediments, soils, groundwater systems, air, and cultural history/archeology, if applicable). Name site contaminants of concern (COCs) and discuss why they were chosen for analysis. Describe how prior and current work efforts contribute to the understanding of the nature and extent of contamination.

FOR ECOLOGY USE ONLY					Comments
Adequate	Incomplete	Missing	N/A		
X					Provided in follow-up e-mail, see file
X					
X					Map illustrating location of potential and known sources of contamination is needed.
X					
X					
	X				Analytical results are discussed but no discussion of extent of ground water contamination. Ground water is said to be discontinuous but basis for this conclusion is not clear.

- c. **Sampling/Analytical Results.** Discussion of sampling/analytical results should include contaminants analyzed for in samples from each applicable site media (soil, groundwater, vapor, surface water). Include comparison of the results to the applicable Method (A, B, or C) cleanup level, sampling method, laboratory method, and any special sampling or analytical protocols (silica gel, filtration, etc.). Evaluate the quality of the data.

IV. Conceptual Site Model

- a. **Conceptual Site Model (CSM).** Discuss contaminant release, fate and transport, exposure pathways (surface water, groundwater wells, air, direct contact, etc.), and potential receptors (human, aquatic, terrestrial). Describe typical concerns for this type of environmental contamination, and include a discussion of site specific concerns (hydro-geologic setting, receptors, current or future site zoning/land use etc.).

V. Proposed Cleanup Standards

- a. **General.** Clearly identify proposed cleanup levels for each media and rationale for selected level. Explain/justify mixing MTCA methods for different media. Must include a demonstration of conditions that require a calculated solution if one is to be use (e.g., background calculations, use of Method B or C, etc.) and show calculation of the cleanup level, including a list of the input parameters. Include point(s) of compliance.
- b. **Terrestrial Ecological Evaluation (TEE).** A TEE should be performed, if required, as part of cleanup level selection. Reference WAC 173-340-7491 to see if the site qualifies for an exclusion.

www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm

VI. Summary, Conclusions, and Recommendations

- a. **Summary and Conclusions.** Summarize what is known about the site and contamination (updated CSM). Include discussion of COCs that exceed MTCA or are "indicator hazardous substances." Ensure conclusions are supported by the tables and figures included with the report.
- b. **Recommendations.** Outline possible interim/remedial actions if appropriate.

Remedial Investigation Figures

General – Figures should include a north arrow, scale, complete legend, measurement units, and annotated clarification as necessary. Figures should not be cluttered and must be legible and explicable. Document text must reference figures and draw conclusions consistent with information presented on figures. Consider using multiple figures when showing large amounts of information.

FOR ECOLOGY USE ONLY				
X				
		X		
Adequate	Incomplete	Missing	N/A	
X				
MTCA Method A				
X				
Submitted				
		X		
See comments regarding tables and figures				
X				

I. Vicinity Map(s)

- a. Show property in relation to surrounding region. Area covered by Vicinity Map should be proportional to site size.
- b. Show other applicable items including (but not limited to): surface topography, natural areas, surrounding land uses, location of groundwater supply and monitoring wells within a one mile radius.

II. Site Map(s)

- a. Show overall site layout with site features and existing well, boring, and sampling locations labeled consistently with current and historical site data and sample names used in the report. If multiple names exist for a sampling location or area of the site indicate this.
- b. Include COC locations, concentrations, and estimated vertical and horizontal extent of contamination for site media, as applicable. Include waste materials present on site as well as hazardous substance treatment, storage, or disposal areas (show current and historical features).
- c. Show geologic/hydrogeologic information including soil types, wells, screened intervals, and water levels (cross sections are useful for showing this information). Show groundwater flow direction and gradient.
- d. Show other relevant information including (but not limited to): site and property boundaries, buildings/facilities on site, historical site features, underground storage tanks (USTs), previous excavation/interim action activity, etc.

III. Conceptual Site Model

- a. Provide figures showing contaminant release(s), fate and transport, exposure pathways, and potential and/or actual receptors. The lateral and vertical extent of contamination, as currently understood, should be clearly conveyed.

Remedial Investigation Tables

General - Tables should include detailed notes that explain any laboratory or other designations, assumptions, and references. All acronyms used in the table should be defined in a section of the notes even if they are defined in the body of the report, so table information can be quickly understood.

- a. **Sampling Information/Laboratory Methods.** Include current and historical sampling methods and numerical cleanup levels, lab methods, reporting limits, and any special sampling protocols with justification or explanation (e.g. silica gel, filtration).
- b. **Cleanup Levels.** Include potentially applicable ARAR values and recommended cleanup levels.

FOR ECOLOGY USE ONLY				
<input checked="" type="checkbox"/>				Comments
Adequate	Incomplete	Missing	N/A	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Need a comprehensive figure which includes off-Property boring locations.				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Include depths on Soil Sample Locations map. Include locations of former site features/sources (UST locations, service bay, dry cleaner)				
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Need cross sections, ground water elevation contour map.				
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Need map showing historical site features.				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Use off-Property borings to illustrate horizontal extent of GW contamination has been determined				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- c. **Site Data.** Include current and historical analytical and field-measured data. Group by media type. For larger data sets, consider making a summary table of exceedances. Tables should include proposed cleanup levels with any contaminant exceedances clearly indicated using bold font or shading. Non-detectible levels should be noted as 'U' with the numerical laboratory reporting limit (RL) provided rather than 'ND'.

Remedial Investigation Appendices

General. Appendices should contain a description of content and explain how to interpret the information for use. Not all of the following suggestions will apply to all sites.

- a. Exploratory logs, well installation diagrams, groundwater sampling logs, and field records.
- b. Analytical laboratory report and Quality Assurance/Quality Control report.
- c. **Limitations.** Explain any limitations that apply to the work.
- d. Details of field and analytical methods used in former and current investigations and remedial activities. If applicable, append Work Plan/Sampling and Analysis Plan/Quality Assurance Project Plan/Health and Safety Plan.
- e. Other documents that provide additional context or contribute to the understanding of the site – see suggested report format for additional information.

Miscellaneous Items

- a. **Environmental Information Management (EIM).** All sampling data must be uploaded into Ecology's EIM database. This allows Ecology to access data, check results, and/or perform additional analyses. For more information, reference: www.ecy.wa.gov/programs/tcp/data_submittal/Data_Requirements.htm
- b. **Certification (Licensed Professional Stamp).** Engineering, geologic, and hydrogeologic work must be performed under seal of an appropriately licensed professional (RCW 18.43 and 18.220).
- c. **Additional information may be requested by Ecology as required to fully define the site.**
- d. **Submittal Requirements:** Ecology requests three copies of reports submitted per WAC 173-340-850. Please contact the cleanup project manager for specific submittal requirements.

To request ADA accommodation or materials in a format for the visually impaired, call Ecology at 509-454-7834, Relay Service 711, or TTY 877-833-6341.

FOR ECOLOGY USE ONLY				
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Need comprehensive soil and ground water analytical tables. Include historic data and off-Property data.				
Adequate	Incomplete	Missing	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Need appendix that includes all historic boring logs.				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Data needs to be submitted to EIM.				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Only one hardcopy is needed.				