



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 9, 2018

Mr. Edward Clement  
CenturyLink  
600 New Century Parkway  
New Century, KS 66031

**Re: No Further Action at the following Site:**

- **Site Name:** Cascade Autovon Company
- **Site Address:** 12727 412<sup>th</sup> Ave SE, North Bend, WA 98045
- **Facility/Site No.:** 36296841
- **VCP Project No.:** NW3098
- **Cleanup Site ID No.:** 8879

Dear Mr. Clement:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Cascade Autovon Company 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**

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Is further remedial action necessary to clean up contamination at the Site?

**NO. Ecology has determined that no further remedial action is 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**

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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:

- Diesel-range petroleum hydrocarbons (TPHd) into the Soil.



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- TPHd into the Ground Water.

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

Please note that a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel associated with this Site is affected by other sites.

### **Basis for the Opinion**

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This opinion is based on the information contained in the following documents:

1. B&C Equipment Co., *Environmental Site Assessment*, November 12, 1991.
2. B&C Equipment Co., *Pumping and Treatment of UST Tank Excavation Water*, February 28, 1992.
3. B&C Equipment Co., *Monitoring Well Quarterly Sampling Event*, April 16, 1992.
4. B&C Equipment Co., *Monitoring Well 2nd Quarterly Sampling Event*, June 25, 1992.
5. Ecology Technology, Inc. *Letter for Bioremediation Process*, September 29, 1992.
6. B&C Equipment Co., *Monitoring Well 3rd Quarterly Sampling Event*, September 29, 1992.
7. B&C Equipment Co., *Monitoring Well 4th Quarterly Sampling Event*, January 25, 1993.
8. Roy Jensen & Associates, *Groundwater Sampling and Analytical Results*, March 14, 1994.
9. Roy Jensen & Associates, *Groundwater Sampling and Analytical Results*, April 24, 1995.
10. Environmental Partners, Inc., *UST Site Assessment Report*, February 19, 2007.
11. Geosyntec Consultants, *Remedial Investigation Report, Report Version 1*, September 30, 2016.
12. Geosyntec Consultants, *Remedial Investigation Report, Report Version 2*, June 9, 2017.
13. Geosyntec Consultants, *Remedial Investigation Report, Report Version 3*, January 2018.

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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](mailto:PublicRecordsOfficer@ecy.wa.gov), or contacting the Public Records Officer at 360-407-6040. Site documents are accessible in electronic form from the Site web page <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=8879>.

This opinion is void if any of the information contained in those documents is materially false or misleading.

### **Analysis of the Cleanup**

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Ecology has concluded that **no further remedial action** is 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 petroleum hydrocarbon-impacted soil and ground water associated with the former diesel underground storage tanks (USTs) has been adequately defined upon completion of several investigations and cleanup actions conducted on the Site from 1991 through 2017. Soil and ground water analytical results from confirmation samples collected in 2016 and 2017 were all below the MTCA Method A cleanup levels.

#### **Model Remedy:**

In an email received by Ecology on June 20, 2018, a request has been made to close the Site using Model Remedy No. 1 for ground water (**Enclosure B**). Ecology concurs that the Site cleanup qualifies for Model Remedy No. 1 for ground water.

The Site is eligible for closure under a Model Remedy because the Site cleanup complies with the following eligibility criteria listed in Chapter 3 and 4 of Ecology's *Model Remedies for Sites with Petroleum Impacts to Ground water (Model Remedies Guidance)*, Publication No. 16-09-057, August 2016:

- A release to the environment has been confirmed and Ecology has been notified of the release.

- Emergency/interim actions have been implemented (if appropriate). Emergency or interim actions were not required due to the lower risk nature of the Site.
- An adequate Site characterization has been completed. The Site investigations between 1991 and 2017 provides sufficient Site characterization data.
- A Terrestrial Ecological Evaluation (TEE) has been completed. A TEE form has been completed and submitted to Ecology.
- The Site did not cause impacts to any water supply well used for drinking water purposes.
- A primary remedy consisting of source removal, including removal of contaminated soil to the greatest degree practicable has been completed. This primary remedy was conducted in 1991, when approximately 350 cubic yards of petroleum hydrocarbon-impacted soils were removed from the former UST excavation.
- Appropriate remedies have been selected for the Site after the primary remedy. Site cleanup actions included ground water removal and treatment, and natural attenuation. These cleanup actions are among the appropriate model remedies listed in Ecology's *Model Remedies Guidance, Chapter 3*.
- After implementing the selected model remedy, sufficient compliance monitoring has been completed to document that the soil and ground water has met the cleanup levels established. The soil and ground water confirmation sampling results in 2016 and 2017 confirmed soil and ground water throughout the Site are in compliance with the MTCA Method A cleanup levels.
- The air cleanup standards, as determined in accordance with WAC 173-340-750, have been met. The soil and ground water concentrations in 2016 and 2017 confirmed the vapor intrusion pathway evaluation is not necessary.

Based on Ecology's review of Site data and specific requirements for each model remedy identified in Chapter 6 of Ecology's *Model Remedies Guidance*, the Site cleanup complies with the specific requirements for Model Remedy No. 1 for ground water.

## **2. Establishment of cleanup standards.**

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

## Soil

**Cleanup levels.** The Site 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 the leaching (protection of ground water) pathway and protection of the direct contact pathway are appropriate. The MTCA Method A cleanup level for TPHd is considered appropriate for soil at the Site and is protective of human health and environment.

Soil cleanup levels protective of terrestrial ecological receptors are not necessary because the Site meets multiple simplified TEE exclusion criteria in accordance with WAC 173-340-7492(2)(a) and 173-340-7492(2)(c). There was less than 350 square feet of soil contamination at the 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.

## Ground Water

**Cleanup levels.** Cleanup levels were set for ground water based on its potential use as a drinking water source. The MTCA Method A cleanup level for TPHd is considered appropriate for ground water at the Site and is protective of drinking water beneficial uses.

**Point of compliance.** The standard point of compliance for ground water is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest depth which could potentially be affected. This is the appropriate point of compliance for the Site.

### **3. Selection of cleanup action.**

Ecology has determined the cleanup actions you selected for the Site meet the substantive requirements of MTCA. The cleanup actions included the following:

- Removal of two 10,000-gallon USTs in 1991 and one 5,000-gallon UST in 2007 which were formerly used to store diesel fuel for emergency power generators.
- Excavation and disposal of 350 cubic yards of petroleum hydrocarbon-impacted soils.
- Pumping and disposal of contaminated ground water from the excavation.

- Collection of confirmation soil and ground water samples after natural degradation to demonstrate compliance with the MTCA Method A cleanup levels.

The selected cleanup actions also comply with the specific requirements for Model Remedy No. 1 for ground water:

- Soil meets the MTCA Method A soil cleanup levels throughout the Site.
- Ground water meets the MTCA Method A ground water cleanup levels throughout the Site.
- Standard points of compliance are used for the cleanup.
- No empirical demonstration is requested or required.
- No institutional control is requested or required.
- Sufficient confirmation sampling and post-remedial monitoring has been completed to demonstrate compliance with cleanup levels established for the Site.

Therefore Ecology concurs with using Model Remedy No.1 for ground water for Site closure, and a feasibility study and a disproportionate cost analysis is not required for the Site.

#### **4. Cleanup.**

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

- June 1991: Two 10,000-gallon diesel USTs were removed from the Site. Initial soil sampling indicated total petroleum hydrocarbons (TPH) concentrations up to 12,000 milligrams per kilogram (mg/kg) were present at the bottom of the excavation.
- October 1991: Approximately 350 cubic yards of petroleum hydrocarbon-impacted soils were over-excavated from the UST excavation. Confirmation soil samples were collected from the bottom and sidewalls of the final excavation. TPHd concentrations equal to or above the MTCA Method A soil cleanup level (2,000 mg/kg) were left in place at the northeast and southwest sidewalls of the excavation at approximately 10.5 feet below ground surface (bgs). A TPHd concentration above the cleanup level at that time (200 mg/kg), but below the current MTCA Method A soil cleanup level was also left in place at the northwest

sidewall of the excavation at approximately 10.5 feet bgs. In addition, a southeast sidewall sample was not collected so the soil condition at the southeast sidewall was unconfirmed. Water seeping into the excavation was pumped out and treated on Site by two separate systems including a Baker tank with a carbon absorption system and a drum filled with pea gravel.

- February 1992: Three monitoring wells (MW-1 through MW-3) were installed at the Site southwest, north, and northeast of the 1991 UST excavation. The three monitoring wells were sampled from March 1992 to March 1995. Ground water samples collected from the wells were analyzed for TPH by EPA Method 8015 Modified, gasoline-range petroleum hydrocarbons (TPHg), and benzene, toluene, ethylbenzene and xylenes (BTEX). All concentrations were below the MTCA Method A ground water cleanup levels. These three monitoring wells were properly decommissioned in January 2018 in accordance with WAC 173-160-460(1)(b).
- January 2007: One 5,000-gallon diesel UST was removed from the Site. Confirmation soil samples collected from the sidewalls of the excavation showed concentrations of TPHd, heavy oil-range petroleum hydrocarbons (TPHo), and BTEX below the laboratory detection limits. Soil samples were not collected from the bottom of the excavation likely due to the presence of ground water in the excavation.
- August 2016 and November 2017: six soil borings were advanced to assess the current soil and ground water conditions on the north, northwest, northeast, southwest, southeast, and east sides of the 1991 UST excavation. Among them, soil borings at the northwest, northeast, and southeast sides of the UST excavation were located in the vicinity of the historic sidewall samples. One soil sample was collected from each soil boring at depths of 9 to 14 feet bgs, which were just above the depth at which ground water was encountered, and the approximate depth that residual soil contamination was left in place. One ground water sample was collected from each soil boring using a five-foot temporary well screen. All soil and ground water samples contained concentrations of TPHg, TPHd, TPHo, and BTEX below the MTCA Method A cleanup levels. The soil analytical results confirmed the residual soil contamination northwest, northeast, and southwest of the 1991 UST excavation has degraded below the MTCA Method A soil cleanup levels, and the soil at southeast corner of the 1991 UST excavation which was not evaluated at that time is in compliance with the MTCA Method A cleanup levels. Ground water analytical results confirmed ground water is in compliance with the MTCA Method A ground water cleanup levels to the north, west and east of the 1991 UST excavation, which covers all ground water flow directions at the Site. The analytical results also confirmed the Site cleanup qualifies for Model Remedy No. 1 for ground water.

## **Listing of the Site**

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Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.
- Leaking Underground Storage Tank List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

## **Limitations of the Opinion**

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### **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 performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

### **3. 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).

## **Termination of Agreement**

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Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW3098).

For more information about the VCP and the cleanup process, please visit our web site: [www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm](http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm). If you have any questions about this opinion or the termination of the Agreement, please contact me at 425-649-7109 or [jing.song@ecy.wa.gov](mailto:jing.song@ecy.wa.gov).

Sincerely,



Jing Song  
Site Manager  
NWRO Toxics Cleanup Program

Enclosure (2):    A – Description and Diagram of the Site  
                      B – Model Remedy Request Email, June 20, 2018

cc:     David Parkinson, Geosyntec Consultants  
          Sonia Fernandez, VCP Coordinator, Ecology  
          Joanna Richards, VCP Financial Manager, Ecology

## **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 the letter.*

**Site:** The Site is defined as TPHd released to soil and ground water. The Site consists of King County parcel number 092308-9060, which covers 1.70 acres of rectangular-shaped land with the street address of 12727 412<sup>th</sup> Avenue SE in North Bend, Washington (Property) (Figure 1). The Site is currently listed in Ecology's Hazardous Sites List with a Washington Ranking Method hazard ranking of 3 (Moderate Risk).

**Area and Property Description:** The Property is located within a mixed commercial/residential area. The Property is bounded to the north by a church and a vacant lot with a Safeway grocery store beyond, to the east by 412<sup>th</sup> Avenue SE with single family residential houses beyond, to the south by a telecommunications switching facility and single-family residential houses beyond, and to the west by Interstate 90 with single-family residential houses beyond.

Current Property developments include a 10,000-square foot structural steel building located on the central portion of the Property. The southern portion of the Property is mostly paved with asphalt, while the northern portion is covered with grass and brush vegetation (Figure 2).

**Site History and Current Use:** Based on historical aerial photographs, the Property was undeveloped until 1968 when Cascade Autovon developed the Property as a telecommunications facility. The existing building was constructed at that time; Cascade Autovon occupied the Property until 1997. CenturyLink acquired the Property in 1997 and continued to operate the Property as a telecommunications facility until 2012.

As part of the regulatory requirements for telecommunications systems, emergency power to be supplied for specific durations was needed. In order to meet these requirements, the Property had USTs installed on the northwestern portion which stored diesel fuel for emergency power generators. A first generation UST system included two 10,000-gallon diesel USTs, which were installed northwest of the building in 1973 and removed in June 1991. A second generation UST system included one 5,000-gallon diesel UST installed in the same excavation in January 1992, which was removed in January 2007. The location of the former USTs are depicted on Figure 2 of the Site Diagrams. No USTs are currently on Site. Since 2012, the Property has been unused and the building has been unoccupied. Currently, the building is vacant and the Property is fenced off and not open to the public.

**Sources of Contamination:** TPHd releases to soil and ground water were discovered in 1991 during the removal of the two 10,000-gallon diesel USTs. At that time, TPHd contamination in soil was confirmed at the bottom and sidewalls of the UST excavation between 10.5 and 11 feet bgs. The exact timing of the release occurrence is unknown.

**Physiographic Setting:** The City of North Bend is situated within the Three Forks area of the Upper Snoqualmie River Valley. The Site is situated at an elevation of approximately 450 feet above mean sea level. The land surface in the vicinity of the Site is relatively flat with a gentle slope to the northeast towards the South Fork Snoqualmie River.

**Surface Water System and Utilities:** Nearby surface water bodies include Ribery Creek located approximately 900 feet northwest of the Site and the South Fork Snoqualmie River located approximately 960 feet east of the Site. Storm water from the Property and adjoining properties flows to City of North Bend municipal storm drains.

**Ecological Setting:** The land surface of the Site and nearby properties is primarily covered by trees, low brushes, and grass or developed with commercial buildings or single family houses. Surface cover of properties further north is comprised of concrete building foundations and asphalt parking areas.

**Geology:** The Site is located on the Snoqualmie River flood plain and the surficial geology in this area consists of alluvial deposits. Soil borings and monitoring wells advanced on the Property indicate the Site is underlain by silty sand to approximately 7 to 8 feet bgs, followed by pebbles and cobbles mixed with silty sand to the total explored depth of 20 feet bgs.

**Ground Water:** Three former monitoring wells (MW-1 through MW-3) were installed on the Site in February 1992. Between 1992 and 1995, depth to water measurements in the wells ranged from approximately 6.8 to 17.4 feet bgs and varied seasonally. Available ground water elevation data in 1992 indicated the Site ground water flow direction varied from northwest to northeast and east. The variation in ground water flow directions is likely due to the floodplain setting (low hydraulic gradient) of the Site and the proximity of both Ribery Creek and the South Fork Snoqualmie River. The three former monitoring wells had not been sampled since 1995 and were buried in grass and low brushes. The three monitoring wells were located using surface geophysical locating methods and subsequently decommissioned in January 2018. No ground water samples were collected from the three monitoring wells before decommissioning due to the poor well conditions. Because the well construction logs are not available, the three monitoring wells were decommissioned in accordance with WAC 173-160-460(1)(b). The surface monuments were removed, and the monitoring wells were over-drilled with the entire casing string and screen interval removed. The resulting holes were filled with bentonite to the surface.

**Water Supply:** Drinking water for the Property is supplied by the City of North Bend, which is primarily sourced from Mount Si Spring on the west side of Mount Si. The nearest drinking water well is located approximately 1,250 feet southeast of the Site with a total depth of 43 feet bgs and a static water level of approximately 8 feet bgs during the time of drilling.

**Release and Extent of Soil Contamination:** Soil sampling locations and analytical results are depicted on Figure 3 of the Site Diagrams.

Petroleum hydrocarbons released to soil were first discovered during the removal of the first

generation USTs (two 10,000-gallon diesel USTs) in June 1991. Immediately after the UST removal, six soil samples were collected from the bottom and sidewalls of the initial excavation at depths between 9 and 11 feet bgs; TPH was detected at concentrations as high as 12,000 mg/kg at the bottom of the UST excavation. Approximately 350 cubic yards of petroleum hydrocarbon-impacted soils were subsequently excavated, including the initial bottom soil samples containing high TPH concentrations. Seven additional confirmation soil samples were collected from the final excavation limits. Five of them were collected from the north, south, northeast, northwest, and southwest sidewalls at 10.5 feet bgs; the other two were collected from the north and south portions of the bottom of the excavation at 13.5 and 12 feet bgs, respectively. The northeast sidewall sample contained TPHg and TPHd concentrations at 100 mg/kg and 2,900 mg/kg, respectively, which were equal to and above the MTCA Method A soil cleanup levels for TPHg and TPHd, respectively. The southwest sidewall sample contained a TPHd concentration equal to the MTCA Method A soil cleanup level of 2,000 mg/kg. Besides these two sidewall samples, the remaining three sidewall samples and the two bottom samples contained TPHg and TPHd concentrations below the MTCA Method A soil cleanup levels. Among them, the northwest sidewall sample contained a TPHd concentration of 550 mg/kg, which was above the cleanup level at that time (200 mg/kg), but below the current MTCA Method A soil cleanup level (2,000 mg/kg). Also, a southeast sidewall sample was not collected due to the fenced security area foundation. Additional excavation was not conducted due to the facility's main transformer on the western portion of the Property and the foundation of a fenced security area along the east sidewall of the excavation. Therefore, petroleum hydrocarbon-impacted soils at concentrations equal to or above the Method A cleanup levels remained in the northeast, southwest, and potentially the southeast sidewalls of the excavation.

When the second generation 5,000-gallon diesel UST was removed in 2007, three soil samples were collected from the sidewalls of the excavation at 3 to 4 feet bgs. No soil samples were collected from the bottom of the excavation likely due to the presence of water in the excavation. Two additional soil samples were collected from beneath the elbows of the product piping at 1 to 2 feet bgs. No soil samples contained detectable concentrations of TPHd, TPHo, or BTEX.

In August 2016 and November 2017, six soil borings (GB-1 through GB-6) were advanced to a total depth of 20 feet bgs on the north, northwest, northeast, southwest, southeast, and east sides of the 1991 excavation. One soil sample was collected from each soil boring at depths of 9 to 14 feet bgs, which were just above the depth at which ground water was encountered, and the approximate depth that residual soil contamination was left in place. All soil samples contained concentrations of TPHg, TPHd, TPHo, and BTEX below the MTCA Method A soil cleanup levels. The investigation results confirmed the residual soil contamination northwest, northeast, and southwest of the 1991 UST excavation has degraded and is now in compliance with MTCA. The investigation results also confirmed the soil at southeast corner of the 1991 UST excavation is in compliance with the MTCA Method A cleanup levels.

**Release and Extent of Ground Water Contamination:** Ground water sampling locations and analytical results are depicted on Figure 4 of the Site Diagrams.

A petroleum hydrocarbon release to ground water was discovered during the UST removal in June 1991. Ground water was encountered at approximately 10.5 feet bgs in the UST excavation. A non-representative water sample was collected from the water discharging into the excavation, which contained a TPHd concentration above the MTCA Method A ground water cleanup level. Approximately 10,000 gallons of water were pumped into a 20,000-gallon Baker tank on the Site, later treated using a carbon absorption treatment system and then released into a nearby drainage ditch which flowed in a northward direction toward a nearby vacant field off Property. Hydrocarbon breakthrough was monitored for continuously and one water sample collected from the discharge end of the treatment system did not contain concentrations of TPH and BTEX above the laboratory detection limits. During the installation of the new 5,000-gallon diesel UST in January 1992, pumping water into the Baker tank was determined to be not feasible because large volume of water discharged into the excavation at a relatively fast rate. A separate filter system was installed in the excavation using a drum filled with pea gravel, which pumped water to a depression located at the north end of the Site. Discharge water was continuously monitored for visual evidence of contamination (i.e. sheen) during the pumping activities.

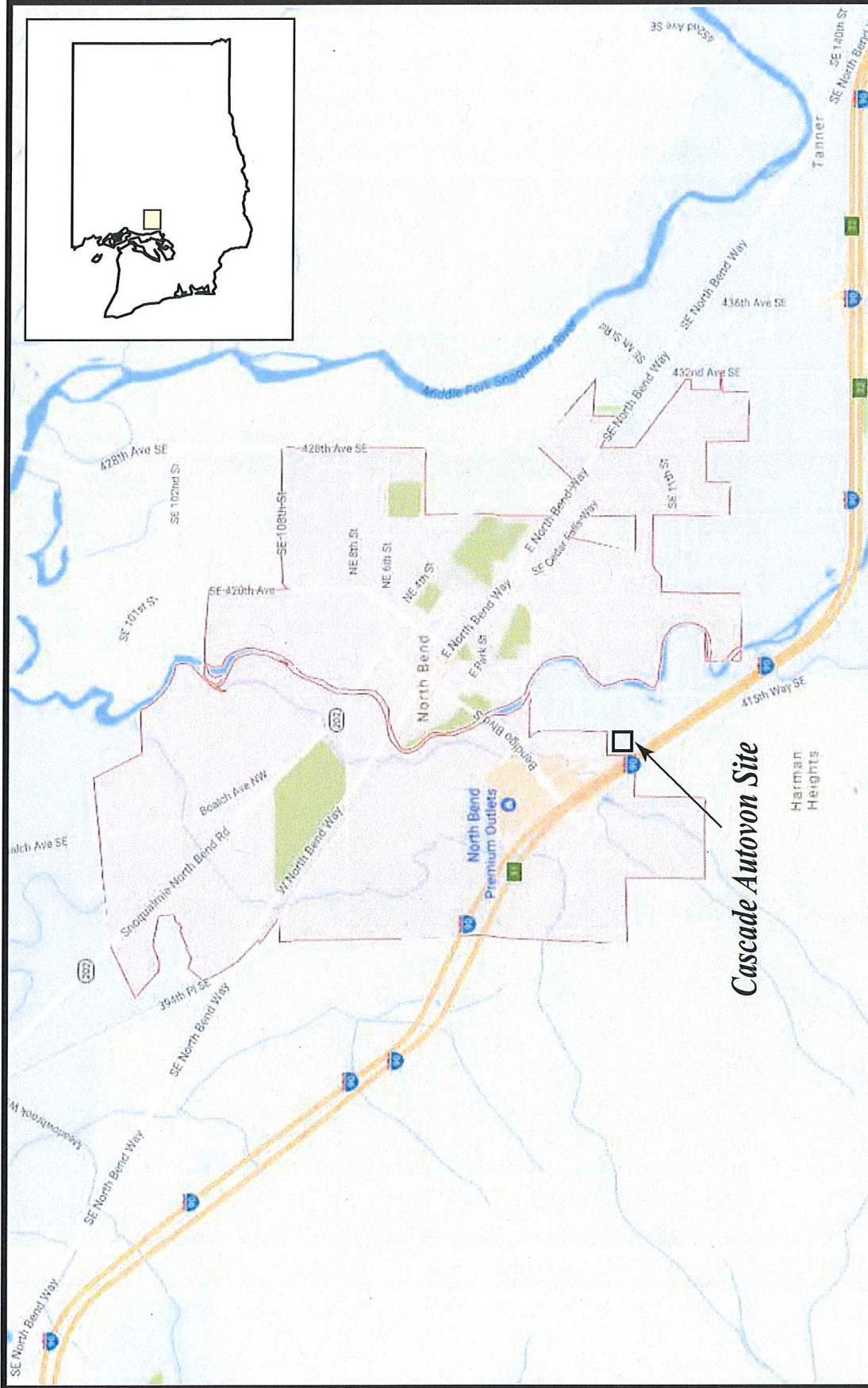
Three monitoring wells (MW-1 through MW-3) were installed at the Site in February 1992 to a total depth of 25 feet bgs with screened intervals between 5 and 25 feet bgs. Ground water samples were collected from the three monitoring wells in March, June, September, and December 1992, November 1993, February 1994, and March 1995. The ground water samples were analyzed for TPH by EPA Method 8015 Modified, TPHg, and BTEX. No concentrations were ever detected above the MTCA Method A ground water cleanup levels in all three monitoring wells. Among them, two monitoring wells MW-2 and MW-3 are located near the north end of the Site. The ground water monitoring data indicated the ground water at the north end of the Site is in compliance after the water pumped from the UST excavation had been treated and discharged into this area in January 1992.

During the removal of the 5,000-gallon diesel UST in January 2007, ground water was encountered at approximately 7 feet bgs in the excavation. One grab ground water sample was collected from a tank observation well situated immediately east of the UST and within the boundary of the UST excavation. The water sample contained a TPHd concentration below the MTCA Method A ground water cleanup level; however, Ecology does not recognize a grab water sample from an excavation as being representative of ground water conditions.

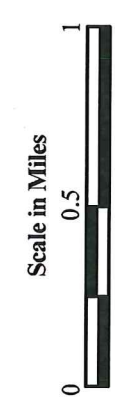
Six soil boring GB-1 through GB-6 were advanced on the north, northwest, northeast, southwest, southeast, and east sides of the 1991 UST excavation in August 2016 and November 2017. One ground water sample was collected from each soil boring using a five-foot temporary well screen. All ground water samples collected from the borings contained concentrations of TPHg, TPHd, TPHo, and BTEX below MTCA Method A ground water cleanup levels.

# Site Diagrams

Enclosure A: Figure 1



**Legend**



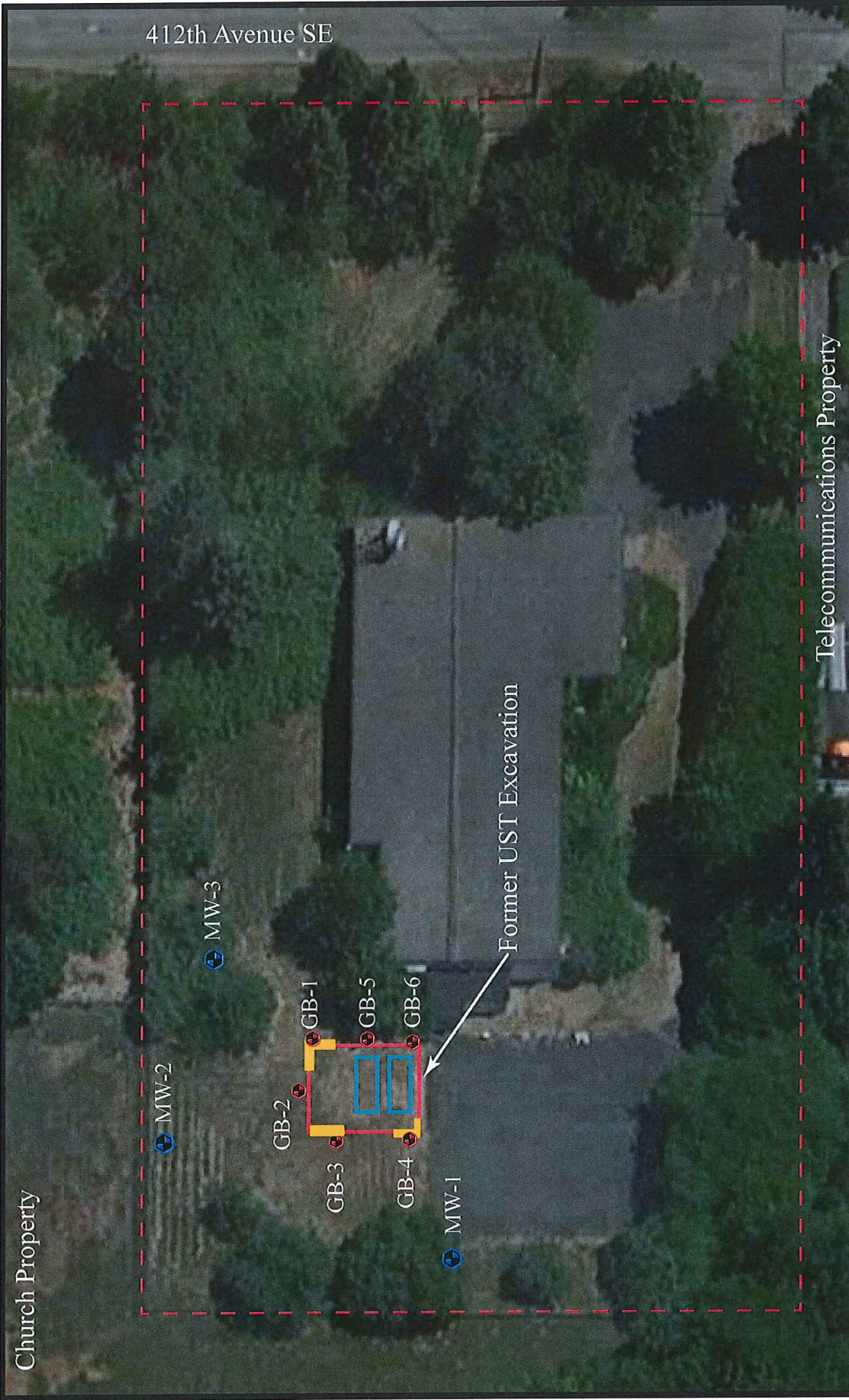
Locations approximate

**Cascade Autovon**  
**12727 412th Avenue SE, North Bend, WA**

		Figure 1
	Seattle, WA	January 2018

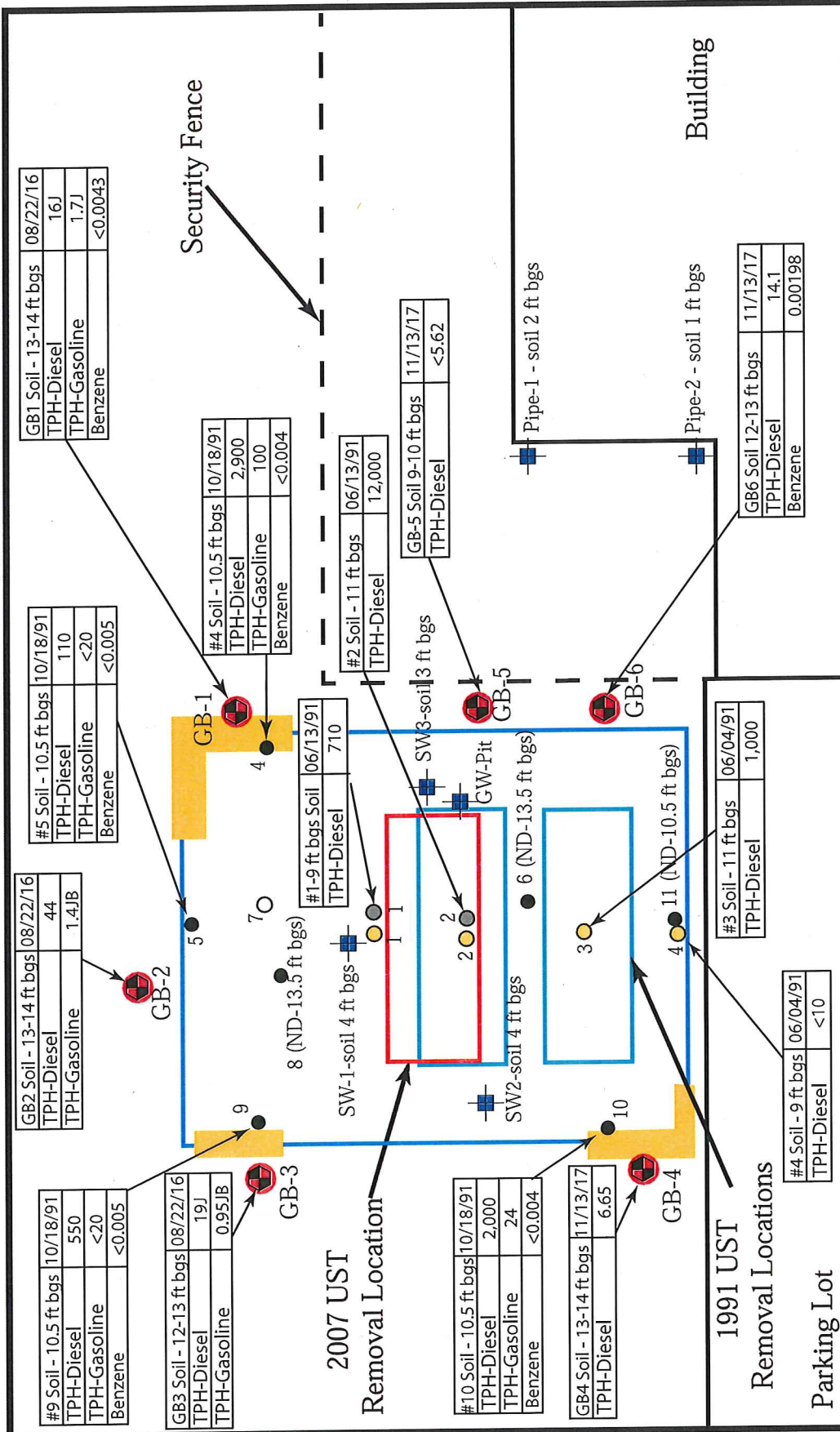


Enclosure A: Figure 2



<p><b>Legend</b></p> <ul style="list-style-type: none"> <li> Property Boundary</li> <li> Abandoned Monitoring Well (Approximate Former Location)</li> <li> Former UST Excavation with approximate locations of former USTs.</li> <li> Geosyntec Borehole Location</li> <li> Expected Location of Possible Soil Contamination</li> </ul> <p><i>Locations approximate</i></p>	<p>Scale in Feet</p> <p>0 75 150</p>	<p><b>Cascade Autovon</b></p> <p>12727 412th Avenue SE, North Bend, WA</p>	<p>Figure 2</p>
		<p><b>Geosyntec</b> consultants</p> <p>Seattle, WA</p>	<p><b>CenturyLink™</b></p> <p>January 2018</p>

Enclosure A: Figure 3



**Map of Sample Locations and Soil Analytical Results, Cascade Autovon 12727 412th Avenue SE, North Bend, WA**

**Geosyntec consultants**  
Seattle, WA

**CenturyLink**  
January 2018

**Figure 3**

**Legend**

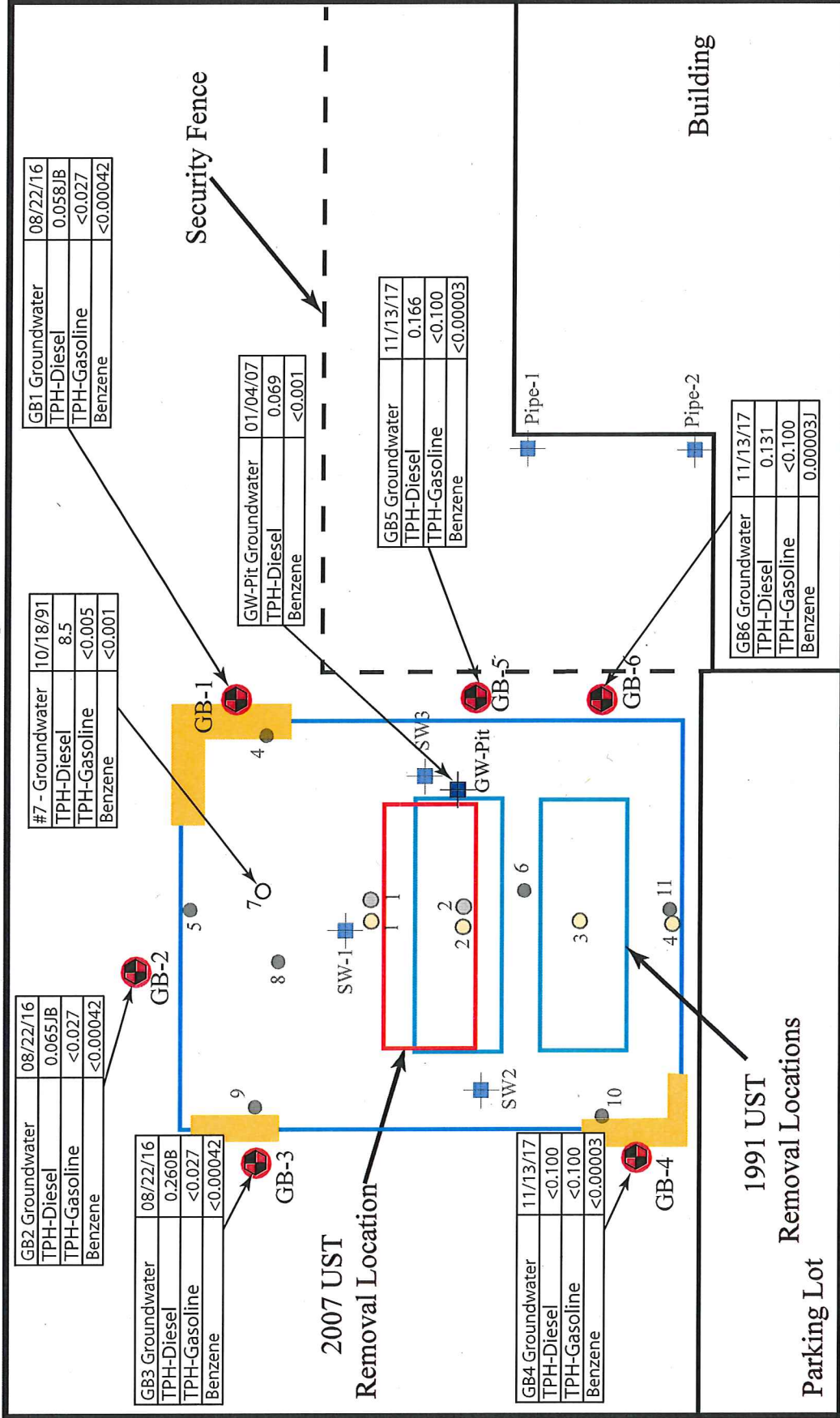
- Soil & Groundwater samples collected 1/4/2007 (all non-detect)
- Soil samples collected 6/13/91 (Subsequently Excavated)
- Soil samples collected 6/4/91 (1-3 Subsequently Excavated)
- Groundwater sample collected 10/18/1991
- Soil samples collected 10/18/1991
- Geosyntec Borehole Location
- Former UST Location Removed in 2007
- Former UST Locations and excavation removed in 1991
- Approximate Location of 1991 soil contamination

**Scale in Feet**  
0 25 50

**Removal Locations**  
2007 UST Removal Location  
1991 UST Removal Location  
Parking Lot

*Locations approximate; Soil in mg/Kg*

Enclosure A: Figure 4



**Map of Sample Locations and Groundwater Analytical Results**  
**Cascade Autovon**  
 12727 412th Avenue SE, North Bend, WA

**Geosyntec consultants**  
 CenturyLink™

Seattle, WA  
 January 2018

Figure 4

**Legend**

- Soil & Groundwater samples collected 1/4/2007 (all non-detect)
- Soil samples collected 6/13/91 (Subsequently Excavated)
- Soil samples collected 6/4/91 (1-3 Subsequently Excavated)
- Groundwater sample collected 10/18/1991
- Soil samples collected 10/18/1991
- Geosyntec Borehole Location
- Former UST Location Removed in 2007
- Former UST Location and excavation removed in 1991
- Approximate Location of 1991 soil contamination

**Scale in Feet**  
 0 25 50

**Locations approximate; Groundwater in mg/L**

**Enclosure B**

**Model Remedy Request Email  
June 20, 2018**

## Song, Jing (ECY)

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**From:** David Parkinson <DParkinson@Geosyntec.com>  
**Sent:** Wednesday, June 20, 2018 8:45 AM  
**To:** Song, Jing (ECY)  
**Cc:** Edward B. Clement Jr. (edward.b.clement@centurylink.com)  
**Subject:** Cascade Autovon Request for Model Remedy closure

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello Jing,

We would like to request that the Cascade Autovon site be closed under the Model Remedy approach for both petroleum contaminated soil and groundwater.

The site meets the requirements for Final Remedy number one (1) for both soil and groundwater at petroleum contaminated sites, which requires the site to meet MTCA method A requirements for unrestricted use. The remedial investigation results confirm the site meets these requirements for both soil and groundwater.

The basis for meeting eligibility requirements for Model Remedy number 1 include:

- Source removal is complete, based on soil excavation and follow up soil investigation;
- Groundwater meets MTCA A regulatory cleanup limits for unrestricted use based on monitoring in the 1990s and confirmation from recent groundwater investigations;
- Vapor intrusion evaluation is not required based on excavation of source soil contamination, and because soil and groundwater meet MTCA A regulatory cleanup limits; and
- Surface water and sediments are not impacted.

Please let me know if you need additional information in order to make this determination, and I will get back to you as soon as possible.

Thank you, Dave

**Dave Parkinson, Ph.D., P.G.**  
Senior Scientist

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