



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 7, 2018

Mr. Mike Raskin
MJR Development
6725 116th Avenue NE, Suite 100
Kirkland, WA 98033

Re: Opinion on Proposed Cleanup of the following Site:

- **Site Name:** Meeker Gas Station Former
- **Site Address:** 105 N Washington Ave, Kent, WA 98032
- **Facility/Site No.:** 44681713
- **VCP Project No.:** NW3167
- **Cleanup Site ID:** 2782

Dear Mr. Raskin:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Meeker Gas Station Former 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?

YES. Ecology has determined that, upon completion of your proposed cleanup, further Site characterization or 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-range petroleum hydrocarbons (TPHg), benzene, and xylenes into the Soil.
- TPHg and benzene 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(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=2782>.

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 **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 not sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

- Additional soil sampling is required to fully characterize the horizontal and vertical extents of the residual soil contamination at the Site.
 - The horizontal extent of the residual soil contamination to the south and east of the Property boundaries are not defined. Additional soil sampling is required in

the sidewalks and/or streets adjacent to the southern and eastern Property boundaries.

- A bottom confirmation soil sample collected at 8 feet below ground surface (bgs) from a 2002 remedial excavation (sample C3-8') contained a TPHg concentration above the MTCA Method A soil cleanup level. Continued excavation to a deeper depth was not performed due to the presence of ground water. Oxygen-release compounds (ORC) were placed at the bottom of the excavation at the time. Additional soil sampling is required to confirm and/or delineate the residual soil contamination at the bottom depth of the former excavation.
- Additional ground water monitoring wells and ground water sampling is required to fully characterize the extent of the residual ground water contamination at the Site.
 - The downgradient extent of the petroleum hydrocarbon-contaminated ground water plume has not been determined, and has likely migrated beyond the southern and eastern Property boundaries. Additional permanent or temporary ground water monitoring wells in the sidewalks and/or streets adjacent to the southern and eastern Property boundaries are needed to fully delineate the extent of the ground water plume.
 - A periodic ground water monitoring program should be established for existing and newly installed ground water monitoring wells.
- At least one waste oil underground storage tank (UST) was reportedly present at the Property. Please provide the estimated location(s) of the former waste oil UST(s) on a Site map. Soil and ground water samples collected in the vicinity of the former waste oil UST(s) should be analyzed for the full suite of the required analysis for waste oil per Table 830-1 of the MTCA regulation.
- The vapor intrusion pathway needs to be evaluated based on the existing and newly collected soil and ground water characterization data. The vapor intrusion pathway evaluation should be based on the following Ecology guidance documents:
 - *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action, Publication No. 09-09-047, Revised April 2018.*
 - *Updated Process for Initially Assessing the Potential for Petroleum Vapor Intrusion, Implementation Memorandum No. 14, March 31, 2016.*
 - *Petroleum Vapor Intrusion: Updated Screening Levels, Cleanup Levels, and Assessing PVI Threats to Future Buildings, Implementation Memorandum No. 18, January 10, 2018.*

- An Excel spreadsheet with revised groundwater, sub-slab soil gas, and deep soil gas screening levels available at: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview/Vapor-intrusion-2015-changes-to-the-2009-toxicit>.
- The 2017 *Remedial Investigation, Feasibility Study and Cleanup Action Plan (RI/FS/CAP)* did not provide complete information required by a RI. A complete RI report with summary tables and figures needs to be submitted to Ecology under the seal of an appropriate environmental professional. Ecology's recommended RI report format consolidates all pertinent Site historical information, collective soil and ground water data, and completed Site cleanup data. See the following Ecology web page for the RI report format and content requirements:
<https://fortress.wa.gov/ecy/publications/SummaryPages/1609006.html>.
At a minimum, additional and/or revised summary tables, figures, and attachments should be provided as described in the following comments:
 - Please include the ground water monitoring and sampling results for the periodic ground water sampling events between June 2002 and March 2005 in Table 2 of the 2017 *RI/FS/CAP*, or in a separate table.
 - Please provide a rose diagram presenting all current and historical ground water flow directions, based on the data from the periodic ground water monitoring events between 2002 and 2005, and newly collected ground water monitoring data.
 - Please revise the maps for residual petroleum hydrocarbons in soil and ground water, which are designated as Figure 6 and Figure 8 in the 2017 *RI/FS/CAP*.
 - Figure 6 should include the bottom excavation sample C3-8'.
 - Figure 6 should include all historical soil sample locations, including these sample locations that have been excavated. The historical soil samples that were collected before the 2002 remedial excavation and were removed during the excavation should be marked with a different symbol or color coding.
 - Figure 8 should include the historical ground water sampling location and analytical results from soil borings that were not confirmed by a permanent monitoring well, such as SP3 and SP4.
 - Please revise the existing cross section and provide additional cross section(s) passing the residual soil and ground water contamination along the southern

Property boundary and the utility corridor. Cross sections should include the remedial excavation limits, the utility corridor limits, the Property boundaries, soil and ground water sampling locations, depths, and analytical results. Vertical scale on cross sections should reference mean sea level datum.

- Please provide the monitoring well construction details for ground water monitoring wells MW1 through MW4 and OW1 through OW3.
- Please provide the monitoring well decommissioning reports for the ground water monitoring wells MW1, MW2, and MW4, which were decommissioned in 2001 and 2002 during to a street widening project and prior to a remedial excavation.

2. **Establishment of cleanup standards.**

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. Because the Site has relatively few contaminants of concern, the MTCA Method A cleanup levels are appropriate for soil at the Site. These Method A soil cleanup levels are based on protection of ground water, per WAC 173-340-900, Table 740-1.

Soil cleanup levels protective of terrestrial ecological receptors are not necessary because the Site meets the terrestrial ecological evaluation (TEE) exclusion criteria in accordance with WAC 173-340-7491(1)(c). A TEE form was included in the 2017 *RI/FS/CAP*. There are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of the Site.

Points 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 levels are appropriate for this purpose, and were selected as the cleanup levels for ground water at the Site. These Method A ground water cleanup levels are available in WAC 173-340-900, Table 720-1.

Points 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 that the incomplete Site characterization does not allow a determination whether the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The 2017 RI/FS/CAP proposed applying institutional control as the cleanup action for residual soil and ground water contamination. Currently, the horizontal and vertical extents of the soil and ground water contamination have not been fully delineated. An appropriate cleanup action can be selected only after the Site is fully characterized and cleanup levels have been developed. The cleanup action selected must meet the minimum requirements in WAC 173-340-360(2). Ecology does not concur with the current feasibility study due to the incomplete Site characterization.

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

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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). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

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

Sincerely,



Jing Song
Site Manager
NWRO Toxics Cleanup Program

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

cc: Eric Koltes, Environmental Partners, Inc.
Sonia Fernandez, Ecology VCP Coordinator, NWRO

Enclosure A

Description and Diagrams of the Site

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions expressed in the letter.

Site: The Former Meeker Gas Station Site is defined as TPHg, benzene, and xylenes released to soil, and TPHg and benzene released to ground water at 105 Washington Avenue North in Kent, Washington (Property) (**Figure 1**). The Property consists of one King County parcel number 5436200526, which covers 1.88 acres of land on the northwest corner of the intersection of the Washington Avenue North and West Meeker Street. The Site impacted by the releases includes the southeast portion of the Property, and right-of-ways to the south and east. Currently the Site boundary is not fully defined.

Area and Property Description: The Property is located at the southeast corner of the Meeker Square shopping center. The Meeker Square shopping center includes a department store (Big Lots), a pharmacy (Rite Aid), a dry cleaners (Meeker Cleaners), restaurants (Ichi Teriyaki and Jimmy Johns), and the Washington Department of Social Health and Welfare, and is surrounded by a commercial parking lot. The Rite Aid pharmacy store and associated parking lot currently occupies the Property.

The Property is located within a commercially zoned area in Kent. The Property is bounded by Washington Avenue North to the east, with a shopping center (Crossgate Shopping Center) beyond. The Property is bounded by West Meeker Street to the south, with a Chevron-branded service station beyond. The Property is bounded to the north and west by the other portions of the Meeker Square shopping center and associated parking lots.

A second cleanup site, Meeker Cleaners (facility ID 87719977), is also located within the Meeker Square shopping center, approximately 170 feet west of the Former Meeker Gas Station Site. The Meeker Cleaners Site will be addressed separately under a VCP number NW3168 and does not affect, or is not affected by, the Former Meeker Gas Station Site.

Property History and Current Use: A grocery store historically occupied the Property from 1928 until it was burned down in September 1960. Standard Oil (Chevron) purchased the Property and constructed a gasoline service station on the southeast portion of the Property (approximately 0.4 acres in size) in 1960 and 1961. The former gasoline service station reportedly included two dispenser island canopies, one station building, and USTs that contained gasoline and waste oil. The estimated former service station boundary and the associated gasoline USTs location are depicted on **Figure 2**.

Information regarding the contents and volumes of the USTs, and the locations of the waste oil UST and dispenser islands, are not currently available. The service station reportedly operated from 1960 to 1983, at which time the USTs were removed and the station building was

demolished. The Property was then primarily used for parking associated with the Meeker Square Shopping Center, until the current Rite Aid store was built in 2007.

Sources of Contamination: Based on the previous Site investigations, the petroleum hydrocarbon contamination at the Site is likely associated with the releases from the former USTs, dispenser islands, and product piping at the former service station. Petroleum hydrocarbons released to soil were initially discovered during a Phase II Site investigation in 1991; however, the release was not reported to Ecology until April 2002. The timing of the release occurrence is unknown.

Physiographic Setting: The Site is situated at an elevation of approximately 40 feet above mean sea level (amsl). The land surface in the immediate vicinity of the Site is relatively flat.

Surface/Storm Water System: The nearest surface water body is Green River located approximately 1,900 feet (0.35 miles) south of the Property. Surface water runoff on the Property is directed to catch basins located just outside the southern and eastern Property boundaries along West Meeker Street and Washington Avenue North.

Ecological Setting: The area surrounding the Property is zoned for commercial uses. Land surfaces on the Property and adjacent properties are primarily covered by buildings and asphalt or concrete pavement with landscaped areas.

Geology: The Site is located in the Puget Sound Lowlands physiographic province, a broad north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. Surficial geology is dominated by Pleistocene glacial alluvium with recent alluvium in river floodplains and mouths. Pleistocene sediments are typically well-compacted beds of very dense till interbedded with sands, silts, and gravels with occasional lacustrine deposits. The Site and the surrounding area is located within the Green River Valley, which is a low lying valley filled with recent alluvium near the surface.

Subsurface soils encountered at the Property include poorly-graded sand from approximately 1 foot bgs to depths ranging from 6 to 9 feet bgs, followed by silty sand and poorly-graded sand with silt to the maximum depth explored of 15 feet bgs. Soils encountered beneath Meeker Street consist of silty sand to approximately 6 feet bgs, underlain by sandy silt to the maximum depth explored of 15 feet bgs.

Ground Water: Shallow ground water is present at the Site at depths ranging from approximately 7 to 10 feet bgs. Based on historical ground water monitoring data, shallow ground water flows to the south-southeast at an approximate gradient of 0.003 foot per foot.

A total of seven ground water monitoring wells have been installed at the Site: MW1 through MW4, and OW1 through OW3. Among them, monitoring well MW4 was decommissioned in 2001 during a street widening project. Monitoring wells MW1 and MW2 were decommissioned in 2002 prior to a remedial excavation. Currently, four monitoring wells (MW3, OW1 through OW3) are present at the Site. The monitoring well locations are depicted on **Figure 3**.

The monitoring well construction details and the monitoring well decommissioning reports (for MW1, MW2, and MW4) are not available. Ground water samples were collected from monitoring wells MW-1 through MW-4 in 1998, and from monitoring wells OW1 through OW-3 in 2014. Ground water samples were also collected periodically from monitoring wells OW-1 through OW-3, and MW-3 between 2002 and 2005. A periodic ground water monitoring program is not currently established for Site monitoring wells. A ground water contour map based on the June 2002 sampling event is depicted on **Figure 3**.

Water Supply: Drinking water for the area is supplied by the City of Kent. City of Kent obtains the drinking water from upland springs and wells located east of the Site on the Kent East Hill and from wells located in the Green River Valley north of the Site. The City of Kent also purchases water from City of Tacoma, which is sourced from the Green River watershed. None of these water supply sources are located within a 1-mile radius of the Property.

According to Ecology's *Well Report* database, there are no water supply wells located within a 0.5-mile radius of the Property. The distance to the closest 10-year wellhead protection area (for East Hill Well 1) is approximately 1.2 miles east of the Property.

Release and Extent of Soil and Ground Water Contamination: Multiple environmental Site investigations and remedial activities have been conducted at the Site since 1991. The soil and ground water sampling locations reported between 1991 and January 2002 are depicted on **Figure 4**. The soil sample locations during a remedial excavation in April 2002 are depicted on **Figure 5**. The soil and ground water sampling locations after April 2002 are depicted on **Figure 6**.

In April 1991, four soil borings (BH1 through BH4) were advanced at the Property. These soil borings were reportedly advanced in the vicinity of former gasoline USTs and waste oil UST. Soil samples were collected between 5 and 15 feet bgs. The soil sample collected at 5 feet bgs from soil boring BH2, located within the estimated former gasoline UST basin, contained a TPH concentration of 1,800 milligrams per kilogram (mg/kg). The TPH was reportedly identified as diesel; however, no subsequent soil or ground water samples identified diesel as a contaminant of concern at this Site.

In January and March 1998, a total of 13 soil borings (B1 through B13) were advanced to total depths ranging from 7 to 10 feet bgs. Among them, soil boring B1, B3, B8, and B13 were converted to ground water monitoring wells MW1 through MW4, respectively. Soil samples were collected between 3 and 7 feet bgs. The soil samples collected at 4 feet bgs from borings B4, B8/MW2, B9, and at 3 feet bgs from boring B13/MW4, contained concentrations of TPHg and/or xylenes above the MTCA Method A soil cleanup levels. Ground water samples were collected from soil borings B4, B7, B9, and B10, and monitoring wells MW1 through MW4. The ground water samples from borings B4, B9, B10, and monitoring wells MW2, contained concentrations of TPHg and/or benzene above the MTCA Method A ground water cleanup levels.

In April 2000, one direct push soil and ground water sampling point (DP13) was advanced near the southern Property boundary. The soil sample collected at 11 feet bgs from boring DP13 contained a TPHg concentration above the MTCA Method A soil cleanup level. The ground water sample from boring DP13 contained TPHg and benzene concentrations above the MTCA Method A ground water cleanup levels.

In January 2002, six soil borings SP1 through SP6 were advanced at the Site to delineate the soil and ground water contamination. Among them, soil borings SP4 through SP6 were installed in the sidewalk adjacent to West Meeker Street. Soil samples were collected from these soil borings between 2.5 and 9.5 feet bgs. The soil sample collected at 4 feet bgs from soil boring SP3 contained a TPHg concentration above the MTCA Method A soil cleanup level. In addition, ground water samples were collected from monitoring wells MW1 through MW3, and five soil borings SP1 through SP5. The ground water samples collected from monitoring well MW2, and soil borings SP3 and SP4, contained TPHg and benzene concentrations above the MTCA Method A ground water cleanup levels.

In April 2002, a remedial excavation was conducted to approximately 7 to 8 feet bgs in the vicinity of the former gasoline UST basin. A total of approximately 342 tons of petroleum contaminated soil was excavated and disposed of off Site. Confirmation soil samples collected at 8 feet bgs from the central bottom of the excavation (C3-8'), and at 2 and 5 feet bgs from the south sidewall of the excavation (D1south-2' and D3-5'), contained concentrations of TPHg and/or benzene above the MTCA Method A soil cleanup levels.

Ground water was encountered in the excavation at approximately 7 feet bgs. Deeper excavation was limited by the saturated soil at the bottom of the excavation; additional excavation to the south was limited by the utility corridor along the southern Property boundary. ORC was mixed into the saturated soil at the bottom of the excavation to enhance the biodegradation of the residual petroleum hydrocarbons.

In May 2002, three additional monitoring wells (OW1 through OW3) were installed at the Property. Soil samples were collected between 5 and 15 feet bgs from the monitoring well borings. The soil sample collected at 5 and 10 feet bgs from monitoring well OW3 contained TPHg and benzene concentrations above the MTCA Method A soil cleanup levels.

Ground water samples were collected periodically from monitoring wells OW1 through OW3, and MW-3 between June 2002 and March 2005. The ground water samples collected from monitoring well OW3 consistently contained TPHg and benzene concentrations above the MTCA Method A ground water cleanup levels.

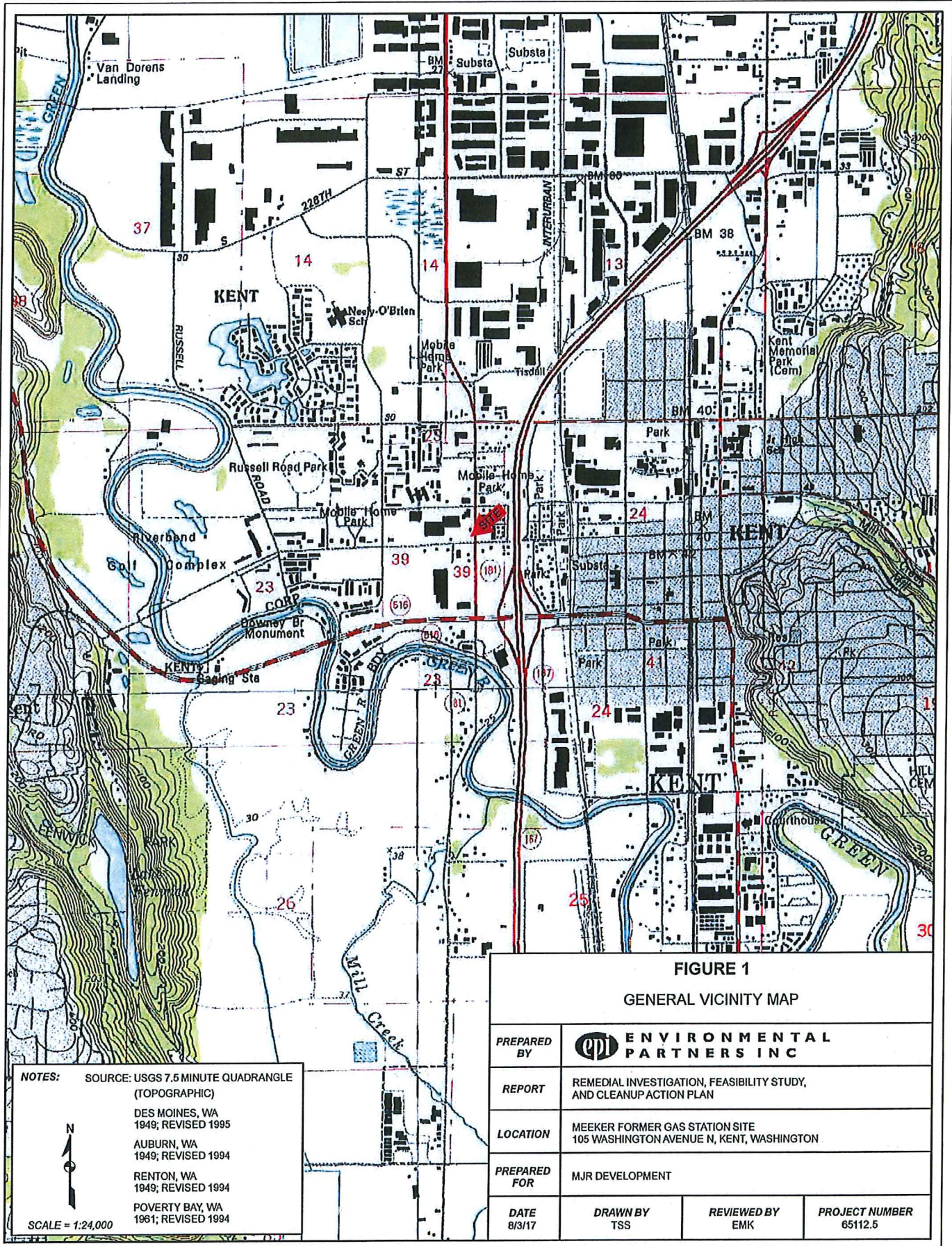
Ground water samples were also collected from monitoring wells OW1 through OW3 in August 2014; the ground water sample collected from monitoring well OW3 contained TPHg and benzene concentrations above the MTCA Method A ground water cleanup levels.

In November 2015, three soil borings (B-7, B-9, and B-10) were advanced to a total depth of 15 feet bgs. Among them, soil boring B-10 was installed in West Meeker Street. Soil samples were

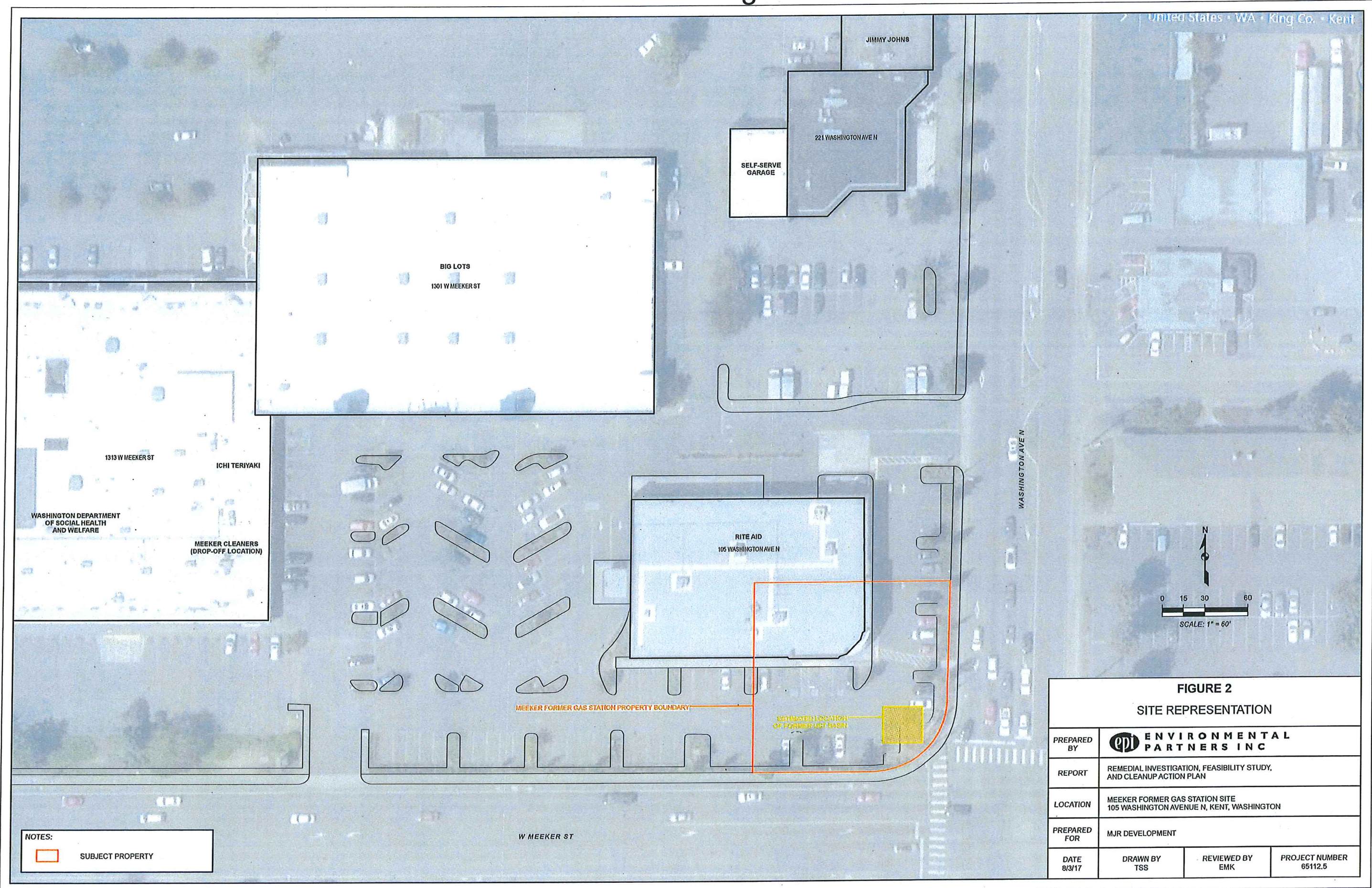
collected from these soil borings between 5 and 12 feet bgs; ground water samples were also collected from these soil borings. The soil and ground water samples collected contained concentrations of TPHg, benzene, toluene, ethylbenzene, and xylenes below the MTCA Method A cleanup levels.

Site Diagrams

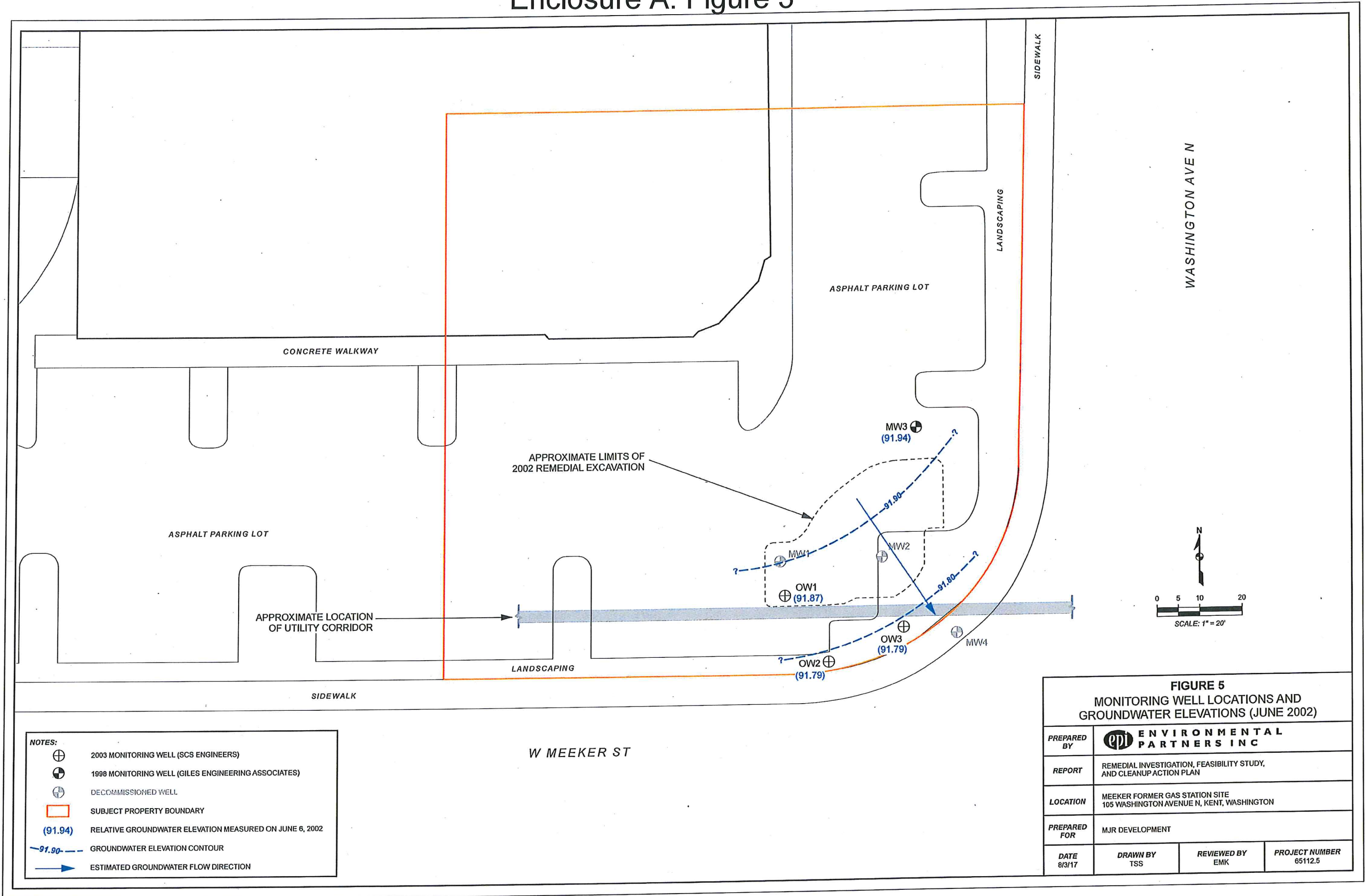
Enclosure A: Figure 1



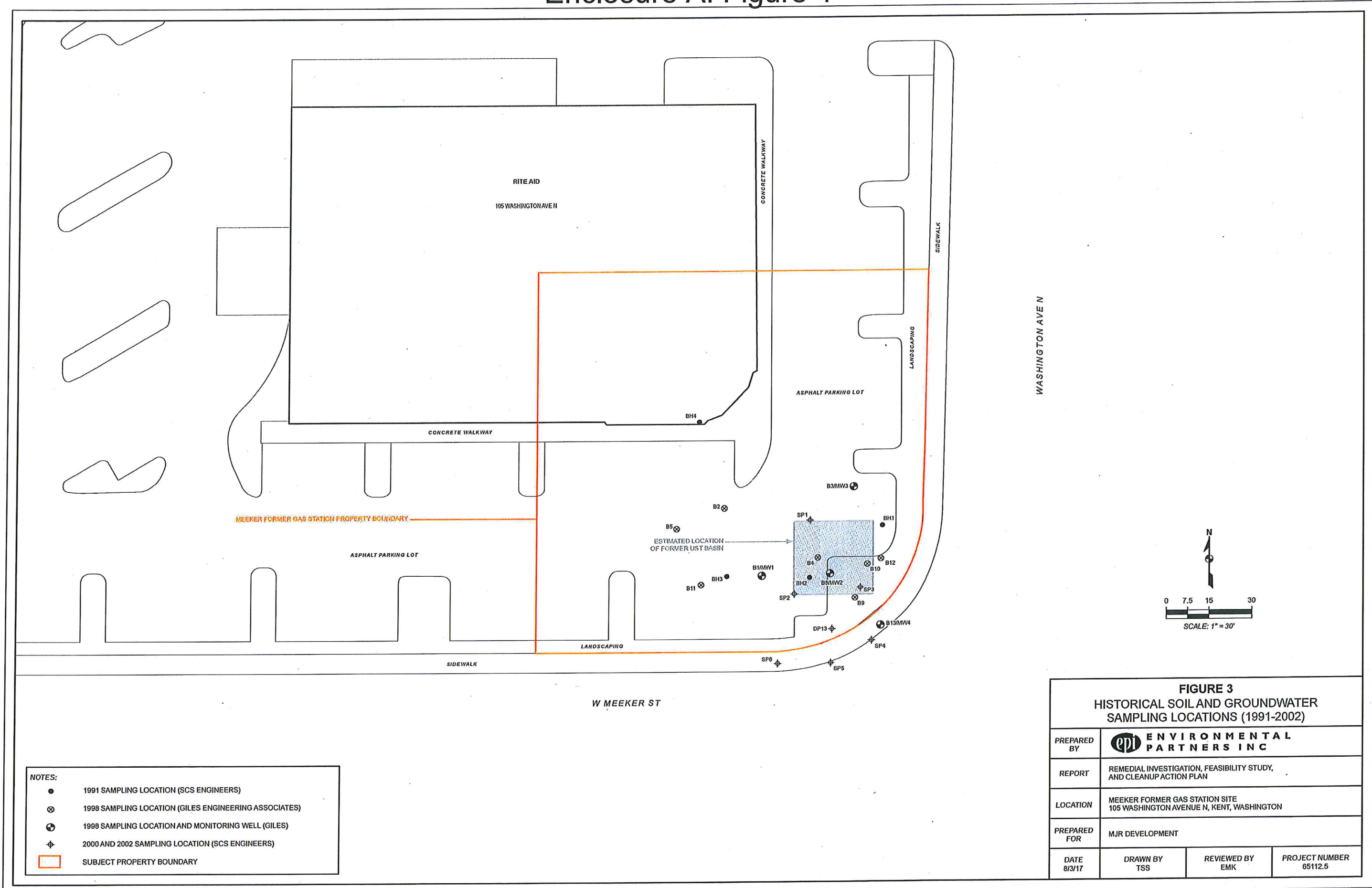
Enclosure A: Figure 2



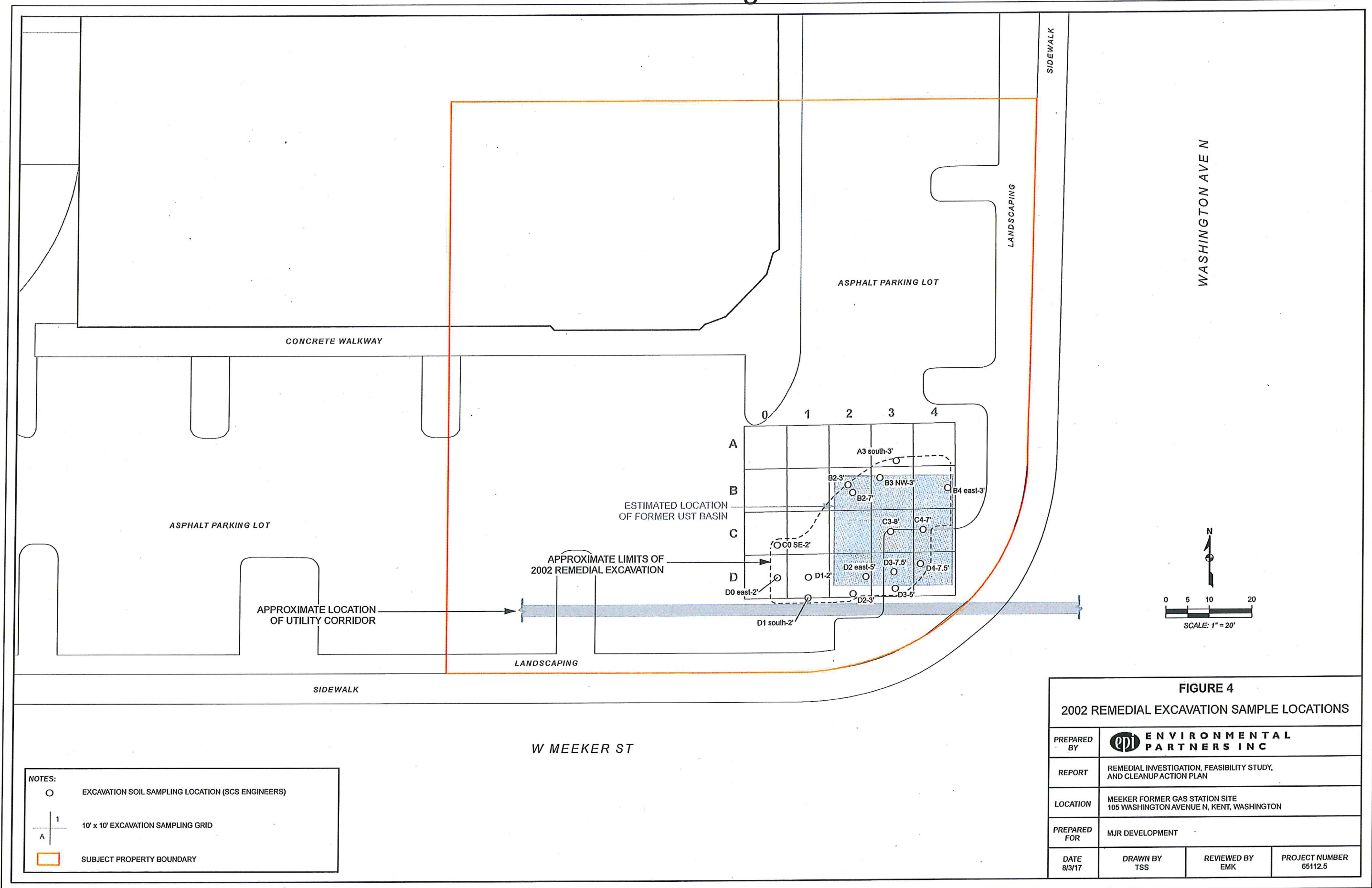
Enclosure A: Figure 3



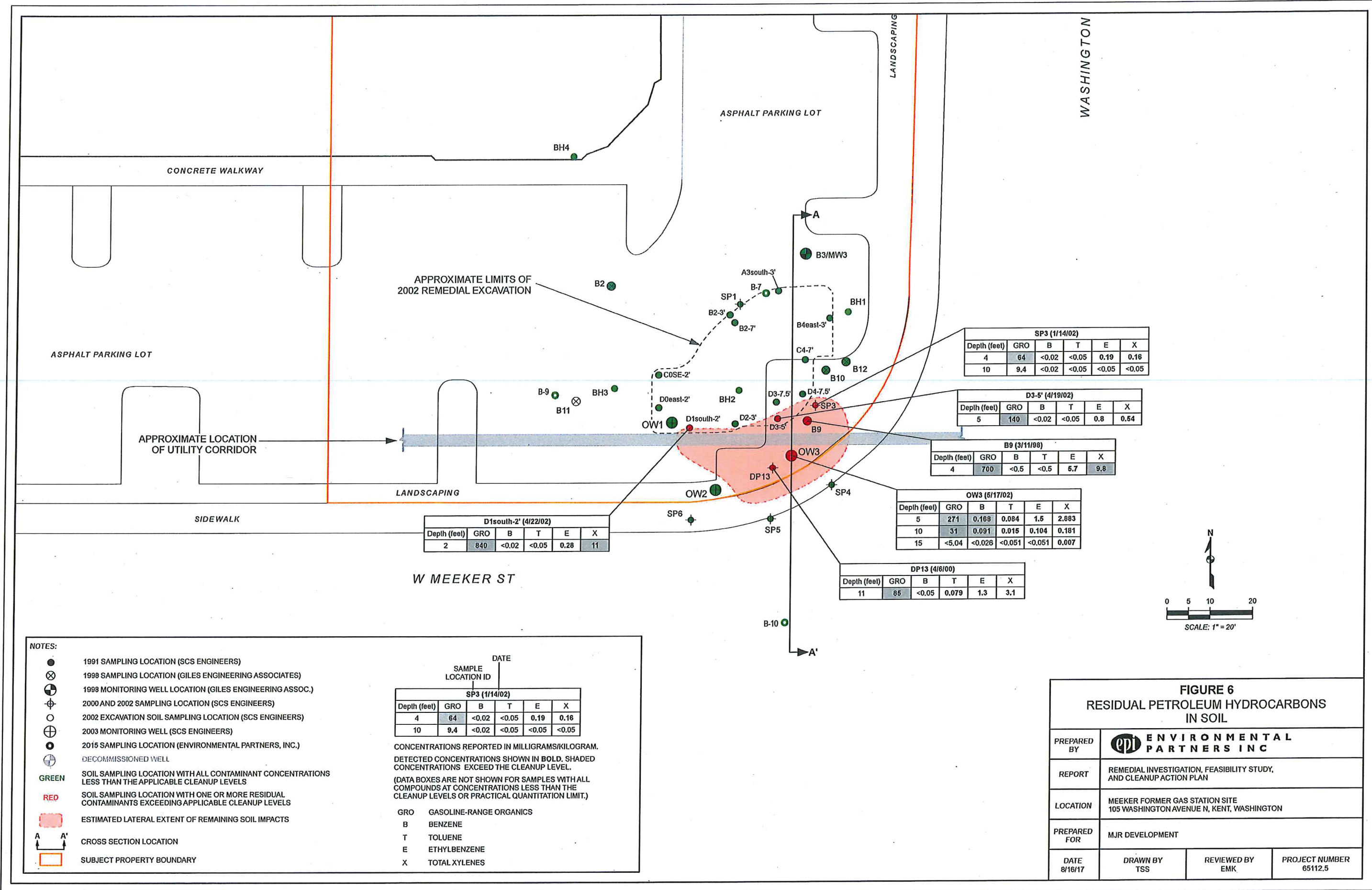
Enclosure A: Figure 4



Enclosure A: Figure 5



Enclosure A: Figure 6



Enclosure B

Basis for the Opinion: List of Documents

1. Environmental Partners Inc. (EPI), *Technical Memorandum, Response to Comments on Remedial Investigation Checklist, Meeker Former Gas Station Site*, May 17, 2018.
2. EPI, *Remedial Investigation, Feasibility Study, and Cleanup Action Plan, Meeker Former Gas Station Site*, September 1, 2017.
3. EPI, *Technical Memorandum, Re: Summary of Investigation, Meeker Square Property*, February 25, 2016.
4. Migizi Group, Inc., *Memorandum, Re: Groundwater Sampling*, September 8, 2014.
5. Department of Ecology, *VCP Opinion on Cleanup Action, Meeker Gas Station Former, VCP NW0878*, June 12, 2006.
6. SCS Engineers (SCS), *Third Annual Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, June 2, 2005.
7. SCS, *Eighth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, May 12, 2004.
8. SCS, *Seventh Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, January 9, 2004.
9. SCS, *Sixth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, November 4, 2003.
10. SCS, *Fifth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, August 1, 2003.
11. SCS, *Fourth Quarter and Annual Groundwater Monitoring Report for the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, May 14, 2003.
12. SCS, *Second Quarter, Summer 2002, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, January 10, 2003.
13. SCS, *Well Installation and Initial Groundwater Monitoring at the Former Chevron Gasoline Station Site, Meeker Square, VCP NW0878*, January 10, 2003.
14. SCS, *Voluntary Cleanup Program Soil Remediation Report – Soil Excavation and Disposal, Gasoline Remediation Project, Former Gasoline Station Site, Meeker Square Shopping Center, VCP NW0878*, July 2002.
15. SCS, *Voluntary Cleanup Program Soil Remediation Report and Request for No Further Action (NFA) Designation for Soil Contamination, Former Gasoline Station Site, Meeker Square Shopping Center (TCP Site NW0878)*, July 16, 2001.