

December 19, 2018

Mr. Nick Acklam, VCP Unit Manager
Washington Department of Ecology Southwest Region
PO Box 47775
Olympia, Washington 98504-7775

Subject: Request for Delisting Site
Gramor Development
5106 East Fourth Plain Boulevard
Vancouver, Washington 98661
Facility Site ID: 81243434
Cleanup Site ID: 4871
Partner Project Number: SM18-230779

Dear Mr. Acklam:

Partner Engineering and Science, Inc. (Partner), on behalf of County Manor MHC LLC (potential purchaser), has prepared this Request for Delisting Site letter for the Gramor Development Site located at 5106 East Fourth Plain Boulevard in Vancouver, Washington (herein referred to as the "Site") (Facility Site ID: 81243434 and Cleanup Site ID: 4871). This letter has been prepared to obtain a written designation from the Washington Department of Ecology (Ecology) that the Site will be delisted from the Suspected Contaminated Site List (CSCSL) and Hazardous Sites List (HSL), and that no further action is required with regards to the environmental circumstances related to the Site.

BACKGROUND

Previous environmental investigations performed at the Site have included Phase I Environmental Site Assessments (Phase I), a soil sampling investigation and a groundwater investigation. The most recent environmental investigation was a Phase I performed by Partner, dated November 9, 2018 on behalf of County Manor MHC LLC and StanCorp Mortgage Investors, LLC. Partner's 2018 Phase I identified the following recognized environmental condition (REC):

- The Site, identified in a regulatory database report as Gramor Development at 5106 East Fourth Plain, is included on the HSL and CSCSL regulatory databases as the result of soil and groundwater on the southeast portion of the Site being impacted by petroleum contamination from an east adjacent leaking underground storage tank (LUST) site (Plaid Pantry #23). The possibility of remnant contaminants on the Site and the open regulatory status of the Site contamination was identified as a REC.

In 1991, PEMCO conducted an environmental investigation on the southeast portion of the Site located adjacent and down-gradient of the Plaid Pantry #23 site. One soil sample contained benzene at a concentration that exceeded Model Toxic Control Act (MTCA) Method A Cleanup Levels (CULs). In 1995,

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Dames & Moore advanced borings coinciding with the PEMCO boring locations for the collection and analysis of groundwater samples. One groundwater sample contained benzene and xylenes at concentrations that exceeded MTCA Method A CULs. Dames & Moore concluded that the identified subsurface impacts were from the Plaid Pantry #23 site and the Site was not the source of the contamination and notified Ecology. In 1997, the Site was placed into the Ecology CSCSL. Previous on-Site subsurface investigations and subsurface investigation activities associated with the east adjacent Plaid Pantry #23 site are summarized below. Copies of previous subsurface investigations were obtained from the Ecology website.

1991 PEMCO On-Site Soil Sampling

PEMCO's site investigation included advancing three soil borings (B-5, B-6 and B-7) along the southeast Site boundary adjacent to an Arco Service Station (later Plaid Pantry #23) for the collection and analysis of soil samples. The soil sample collected from boring B-7 at the soil/groundwater interface [15-16 feet below ground surface (bgs)] contained benzene at a concentration of 1.9 micrograms per kilogram (mg/kg), which exceeded the MTCA Method A CUL.

1995 Dames & Moore On-Site Groundwater Sampling

To assess the potential for impacted groundwater at the Site, Dames & Moore advanced four borings (P-1 through P-4) in the southeast portion of the Site for the collection and analysis of groundwater samples. The groundwater sample collected from boring P-2, which coincided with PEMCO's boring location B-7, contained benzene [290 micrograms per liter ($\mu\text{g/L}$)] and xylenes (1,300 $\mu\text{g/L}$) at concentrations that exceeded MTCA Method A CULs. TPH, benzene, toluene, ethylbenzene, and xylene (BTEX) were not detected in the groundwater samples collected from borings P-1, P-3 or P-4 at concentrations above laboratory RLs.

Dames & Moore, concluded that presence of elevated BTEX compounds at the soil/groundwater interface and in groundwater indicates an on-Site source is unlikely, and the BTEX compounds detected in the southeast portion of the Site were most likely the result of migration of contaminants onto the Site from the east adjacent Arco Service Station (Plaid Pantry #23).

Plaid Pantry #23 Site Investigations

The east adjacent property, later identified as Plaid Pantry #23 and located at 5210 East Fourth Plain Boulevard operated as a gasoline service station (Arco and Plaid Pantry #23) from the early 1960s until 2002. Soil and groundwater samples collected from the Plaid Pantry #23 site in 1998, contained total petroleum hydrocarbons as gasoline (TPH-G), volatile organic compounds (VOCs) and/or total lead at concentrations that exceeded applicable MTCA Method A CULs.

Remedial activities conducted at the Plaid Pantry #23 site between 2002 and 2010 included, site characterization, removal of three USTs and associated piping, in situ remediation with oxygen release compound (ORC) injections into the subsurface, and groundwater monitoring. Groundwater monitoring well MW-5 was installed on the southeast portion of the Site and was sampled between January 2002 and

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December 2010. Groundwater samples collected from MW-5 between January 2002 and December 2010, did not contain gasoline, diesel, heavy/lube oil, or select VOCs at concentrations above laboratory RLs. Groundwater monitoring well MW-6 was installed on the southwest portion of the Plaid Pantry #23 site proximate to PEMCO's and Dames and Moore's borings B-7 and P-2, respectively, and was sampled between January 2002 and January 2013.

Between 2012 and 2013, ESS Environmental Consulting, Inc. (EES) performed additional characterization activities at the Plaid Pantry #23 to meet the regulatory NFA closure criteria outlined by Ecology. ESS's additional characterization activities pertinent to the Site included confirmation soil sampling adjacent to PEMCO's and Dames & Moore's boring locations B-7 and P-2, respectively; confirmation groundwater sampling from monitoring well MW-6; and a wellhead and site boundary survey.

On April 12, 2012, ESS advanced boring B-22 adjacent to PEMCO's and Dames & Moore's boring locations B-7 and P-2, respectively. One soil sample (B22-15/16) was collected at a depth of 15-16 feet bgs and was analyzed for gasoline range hydrocarbons, VOCs and total lead. Based on the laboratory analytical results, gasoline range hydrocarbons and VOCs were not detected at concentrations above the laboratory RLs. Lead was detected at a concentration of 4.8 mg/kg, which was reportedly consistent with typical background lead concentrations in soil and not indicative of a leaded fuel release.

A confirmation groundwater sample was collected from monitoring wells MW-6 on October 9, 2012 and was analyzed for gasoline range hydrocarbons, select VOCs, and total and dissolved lead. Based on the laboratory analytical results VOCs including benzene (1.0 µg/L), ethylbenzene (1.0 µg/L), 1,2,4-trimethylbenzene (0.57 µg/L), 1,3,5-trimethylbenzene (1.3 µg/L), naphthalene (1.8 µg/L) were detected at concentrations above the laboratory RLs, but were below applicable MTCA Method A CULs.

Based on the wellhead and boundary survey, well MW-5 was determined to have been installed to the west of the Plaid Pantry #23 site boundary on the Site (i.e., MW-5 was located on the Site). Additionally, based on ESS's figures, PEMCO's and Dames & Moore's boring locations B-7 and P-2, respectively, are plotted as being located on the Plaid Pantry #23 site.

Ecology issued a No Further Action (NFA) opinion letter, dated August 21, 2013, confirming that the cleanup of the Plaid Pantry #23 site achieved MTCA compliance for soil and ground water throughout the Plaid Pantry #23 site and the former plume, which includes the Site itself.

CONCLUSION

Based upon the findings of the previous investigations associated with the Site and the east adjacent Plaid Pantry #23 site as well as the NFA determination for the Plaid Pantry #23 site, the results of these investigations support that:

- Concentrations of benzene previously detected in soil beneath the Site have diminished to levels below MTCA Method A CULs;

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- Concentrations of benzene and xylenes previous detected in groundwater beneath the Site have diminished to levels below MTCA Method A CULs; and,
- These previously detected contaminants were not sourced on the Site, but originated on the Plaid Pantry #23 site.

Based upon these results, it is Partner's professional opinion that delisting the Gramor Development Site from the CSCSL and HSL, with no further action required with regards to the environmental circumstances related to the Site, is appropriate at this time and we respectfully request that Ecology make such a written determination.

Signatures of Environmental Professionals

If you have any questions, please do not hesitate to contact Cory Martini at (916) 405-1275.



Cory Martini
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Robert Traylor, PG, CHg
Technical Director – Site Mitigation

