

December 20, 2018

Titus-Will Land LLC  
3606 S. Sprague Avenue  
Tacoma, Washington 98409-7444  
Attention: Mr. Graham Tash

Re: Environmental Consulting Services  
11503 Pacific Highway Southwest, Lakewood, Washington

Mr. Tash:

EcoCon, Inc. (ECI) appreciates the opportunity to submit this proposed scope of work and cost estimate for Environmental Consulting Services for the property located at 11503 Pacific Highway Southwest, Lakewood, Washington (the Site/Subject Site/Subject Property/Property).

This proposed work is being conducted in response to a Washington State Department of Ecology (Ecology) *“Further Action Opinion Letter”* dated October 11, 2018 with the goal of receiving a *“No Further Action determination (NFA)”*. In that letter, Ecology indicated that additional work was required at the Site. After reviewing the additional items that Ecology had requested, ECI, on your behalf, submitted a response letter to Ecology indicating that we did not agree with some of the actions Ecology requested and agreed that others were needed. Ecology has not provided a formal response to our letter. Therefore, the scope of work for this this proposal is for the items that we agreed needed to be performed or that seemed reasonable.

The proposed scope of work is broken into seven (7) separate tasks. Each task is described below with estimated fees shown on the attached Schedule of Values.

### **Task 1: Monitoring Well Installation & Sampling**

The first task is the installation and sampling of four (4) groundwater-monitoring wells. The Terra Associates 2006 Cleanup Action Plan (CAP) identified four areas of the property where groundwater monitoring would be required following the proposed soil remediation. According to the CAP and a *“No Further Action likely (NFA Likely) letter”* from Ecology dated August 28, 2006, Ecology agreed to four (4) monitoring wells. Two of the wells were to be located along the northern site boundary, one well located along the western site boundary and one well located in the southeastern portion of the Site nears boring SB-9.

In their October 11, 2018 *“Further Action Letter”* Ecology is requesting that five (5) monitoring wells be installed at the Site. ECI does not agree that more than four (4) wells are needed at this time and are proposing to install four (4) wells in the areas originally proposed by Terra Associates.

For the Groundwater monitoring well installation task in this proposal, ECI will complete a *“Well Installation Work Plan”* detailing the location, installation, sampling & chemical analysis requirements. ECI will then implement the plan by installing the four (4) monitoring wells. During drilling and installation of the monitoring wells, two (2) soil samples will be collected from each boring for chemical analysis.

Depending on field observations and screening, one or more of the samples from each boring may be analyzed for gasoline-range organics (GRO), diesel-range organic (DRO), oil-range organics (ORO), the hydrocarbon volatile constituents of benzene, toluene, ethylbenzene, and xylenes (BTEX), and the metals lead and arsenic. The determination which samples will be analyzed will be determined by an ECI environmental professional based on the field observations and screening. If necessary, the DRO/ORO samples will be analyzed with and without using a silica gel cleanup on the samples to filter out natural organic matter.

### **Task 2: Well Installation Report**

Upon completion of the monitoring well installation, ECI will prepare a *“Monitoring Well Installation Report”*. This report will document the well installation activities, the well construction, the well survey and provide the results of any soil samples collected for analysis. The report will include figures showing the location of the wells and tables summarizing the analytical results from the investigations at the Site. This report will be submitted to Ecology.

### **Task 3: Monitoring Well Survey**

Upon completion of the monitoring wells, ECI will contract with a local survey company to professionally survey the locations and elevations of the monitoring wells. This is required for input into the Ecology Environmental Information Monitoring (EIM) database and to accurately determine groundwater flow direction and gradient.

### **Task 4: Quarterly Groundwater Monitoring and Reporting**

The Ecology August 28, 2006 *“No Further Action likely (NFA Likely) Letter”* from Ecology required and that a minimum of four (4) quarters (90 Day Interval) of groundwater sampling was required with analytical results reported below applicable cleanup levels before the site would be considered for an NFA determination. In addition, Ecology has indicated that an Environmental Covenant will be necessary at

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the Site since not all of the remediated soils are not below the respective MTCA Method A Cleanup levels and are beneath an impervious cap. In their October 11, 2018 *“Further Action Letter”*, Ecology has indicated that long-term groundwater monitoring will be required to determine the effectiveness of the cap. The typical long-term monitoring interval is 18 months.

ECI is proposing the quarterly groundwater monitoring in this proposal and is not proposing the long-term monitoring at this time.

For the quarterly groundwater monitoring task in this proposal, ECI will complete a *“Groundwater Sampling & Analysis Plan”* detailing the sampling & chemical analysis requirements. ECI will then implement the plan sampling the monitoring well quarterly for one (1) year. Should additional quarterly sampling be required ECI will contact the Titus-Will Automotive Group for their authorization.

The samples will be analyzed for GRO, DRO, ORO, BTEX, total and dissolved lead, and total and dissolved arsenic. If necessary, the DRO/ORO samples will be analyzed with and without using a silica gel cleanup on the samples to filter out natural organic matter.

In addition to the *“Monitoring Well Installation Report”* in the above Task 2, ECI will prepare *“Quarterly Groundwater Monitoring Reports”*. These reports will document the groundwater sampling activities, the analytical results of the groundwater samples collected. The reports will include figures and table summarizing the analytical results, groundwater levels, and groundwater flow direction. These reports will be submitted to Ecology.

### **Task 5: Entry of Analytical Data into Ecology’s Environmental Information Monitoring (EIM) Database**

As required by WAC 173-340- WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840, ECI will enter all soil and groundwater data that has not been previously entered into Ecology’ EIM database. This may be an on-going task as data is generated.

### **Task 6: Request for a “No Further Action Determination with an Environmental Covenant”**

Upon completion of four (4) quarters of groundwater monitoring, ECI prepare for Ecology a request for a *“No Further Action Determination with an Environmental Covenant”*. This request will include:

- Completion of a Terrestrial Ecological Evaluation (TEE) Form that is required of all cleanup site in the State of Washington (WAC 173-340-7490). It is likely that the Site will qualify for an exemption from any further ecological evaluation because of its location.
- Preparation of a draft Environmental Covenant (EC) for Ecology review. Ecology requires that the Environmental Covenant include:
  - A long-term monitoring plan for groundwater, indoor air;

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- A plan for maintaining and monitoring the integrity of the impermeable cap at the Site;
- A discussion of how financial assurances required by WAC 173-340-440(11) would be met
- Maps and cross-sections showing the location of the remaining contamination at the Site, the location of the current building with regard to the areas of remediated soil;
- All boring log and test pit logs from the investigations at the Site;
- A professional survey showing rights-of way, easement, platting, and dedications
- A title search conducted within six (6) months prior to the completion of the EC

### **Task 7: Project Contingency: Additional Professional Services, Coordination with Ecology, Client meetings**

*Professional Services:* Additional professional services time may be accrued in managing the project. This time may include working with the regulatory agencies, the Client or other vested entities.

*Groundwater Well Installation & Monitoring:* Should additional groundwater monitoring or monitoring wells be required, ECI will complete a Groundwater Sampling & Analysis Plan and a budget detailing the location, installation, sampling & chemical analysis requirements and the estimated cost.

### **Closing**

The goal for this project is to address Ecology's October 11, 2018 "*Further Action Opinion Letter*" with the intent of receiving a "*No Further Action Determination*". The tasks presented in this document and on the attached Schedule of Values attempt to cover the potential work and costs anticipated to meet this goal.

Should you have any questions, please contact me directly at (253) 921-7059.

Sincerely,

  
Stephen M. Spencer  
Direct: (253) 921-7059

Attachment: Schedule of Values

Cc: Carol Johnston - Washington State Department of Ecology; SWRO w/o attachment