



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

December 9, 2014

Mr. Perry Pineda
Shell Oil Products US
20945 S. Wilmington Ave
Carson, CA 90810

Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site:

- **Site Name:** Jiffy Lube Store 2068
- **Site Address:** 6808 196th St SW, Lynnwood
- **Facility/Site No.:** 27496218
- **Cleanup Site ID.:** 5805
- **VCP Project No.:** NW2070

Dear Mr. Pineda:

Thank you for submitting documents regarding your proposed remedial action for the Jiffy Lube Store 2068 facility (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Property:

Release 1 – Former gasoline service stations (approximate dates of operation 1959 – 1977)

- Gasoline-, Diesel-, Oil-range Total Petroleum Hydrocarbons (TPHg, TPHd, TPHo) in Soil and Ground Water;
- Benzene, Toluene, Ethyl-Benzene, Xylene (BTEX) in Soil and Ground Water; and
- Naphthalene in Soil.

Release 2 – Former Jiffy Lube (oil change facilities approximate dates of operation 1977 – 2006)

- Oil-range Total Petroleum Hydrocarbons (TPHo) in Soil and Ground Water.



Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial action(s):

1. CRA. Subsurface Investigation Report, Former Jiffy Lube Facility, 6808 196th Street Southwest, Lynnwood, WA, Sap Code 171152, Ecology F/S No. 27496218, VCP No. NW2070. October 16, 2014.
2. Washington State Department of Ecology. Further Action Opinion Letter Former Jiffy Lube Facility, 6808 196th Street Southwest, Lynnwood, WA. April 16, 2012.
3. CRA. Remedial Investigation Report, Former Jiffy Lube Facility, 6808 196th Street Southwest, Lynnwood, WA, Sap Code 171152, Ecology F/S No. 27496218, VCP No. NW2070. August 17, 2011.
4. Nowicki & Associates. Lynnwood Q Lube, Site ID #006802, 6808 196th Street SW, Lynnwood, Waste Oil UST – Characterization Soil Boring. November 20, 1995.
5. Nowicki & Associates. Lynnwood Quaker State Lube UST Closure Site Characteristic. September 27, 1995.
6. Ground Water Monitoring Reports 1995 – 2013.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at 425-649-7190.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site,**

Ecology has determined:

Release 1 Former Texaco Service Station (approximate dates of operation 1959 – 1977) and Release 2 Former Jiffy Lube (oil change facilities approximate dates of operation 1977 – 2006) are not comingled.

This determination is based on new data collected during the 2014 subsurface investigation and review of ground water monitoring data from 2006 – 2013. Contaminated soil from Release 2 in the former used waste oil UST area was observed at 1.3 feet bgs with concentrations decreasing to MTCA Method A cleanup up levels for TPHo at 2 feet bgs. The TPHo contaminated soil is approximately four feet above the highest ground water levels observed at the Property. TPHo was not observed in soil samples above MTCA Method A cleanup levels in the northeast corner when wells MW-3, MW-4, and MW-5 were installed. In addition, TPHg levels in soil were observed in the northeast corner of the Property in the general location of the former Texaco dispenser island. Based on ground water data from MW-10, down gradient monitoring well of the waste oil UST, the TPHo contamination does not appear to have leached into and impacted ground water. Separate Phase Hydrocarbons were observed in MW-3, MW-4, MW-5 and MW-8 which are all generally down gradient of the Texaco dispenser island release and up gradient of the used waste oil release.

Contaminated soil associated with the new oil UST in the western area of the Property was removed and confirmation soil samples were below MTCA Method A cleanup levels.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed

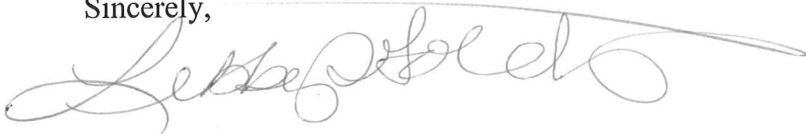
Page 4

for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 425-649-7242.

Sincerely,

Sincerely,

A handwritten signature in cursive script, appearing to read "Libby Goldstein", with a long horizontal flourish extending to the right.

Libby Goldstein
NWRO Toxics Cleanup Program

Enclosures (1): A – Description and Diagrams of the Site

cc: Christina McClelland, CRA
Sonia Fernandez, NWRO Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

Site Name: Jiffy Lube Store 2068

Site Address: 6808 196th St SW, Lynnwood

Facility/Site No.: 27496218

Cleanup Site ID.: 5805

VCP Project No.: NW2070

Site and Property Definition: The Site is located at 6808 196th St SW, Lynnwood, Washington (the Property). The Site is defined by two releases associated with the following releases:

Release 1 – Former Texaco service stations (approximate dates of operation 1959 – 1977)

- Gasoline-, Diesel-, Oil-range Total Petroleum Hydrocarbons (TPHg, TPHd, TPHo) in Soil and Ground Water;
- Benzene, Toluene, Ethyl-Benzene, Xylene (BTEX) in Soil and Ground Water;
- Naphthalene in Soil.

Release 2 – Former Jiffy Lube (oil change facilities approximate dates of operation 1977 – 2006)

- Oil-range Total Petroleum Hydrocarbons (TPHo) in Soil and Ground Water.

The extent of contamination of the two known releases on the Property, as currently understood, **do not** appear to be co-mingled. The boundaries of the two releases do not overlap. The TPHo release from the used oil tank is contained to an area beneath the floor of the Aloha Coffee shop extending to a depth of 2 feet bgs and does not appear to have impacted ground water. The TPHg and TPHd release from the former gasoline service station appears to be located in the northeast section of the Property and does appear to impact ground water. Separate Phase Hydrocarbons have been observed in four monitoring wells on the Property which appears to be associated with the TPHg release from the former service station.

This determination is based on new data collected during the 2014 subsurface investigation and review of ground water monitoring data from 2006 – 2013. Contaminated soil from Release 2 in the former used waste oil UST area was observed at 1.3 feet bgs with concentrations decreasing to MTCA Method A cleanup up levels for TPHo at 2 feet bgs. The TPHo contaminated soil is approximately four feet above the highest ground water levels observed at the Property. TPHo was not observed in soil samples above MTCA Method A cleanup levels in the northeast corner (former gasoline dispenser island are) when wells MW-3, MW-4, and MW-5 were installed. In addition, TPHg levels in soil were observed in the northeast corner of the Property in the general location of the former Texaco dispenser island. Based on ground water data from MW-10, down gradient monitoring well of the waste oil UST, the TPHo contamination does not appear to have leached into and impacted ground water. Separate Phase Hydrocarbons were observed in MW-3, MW-4, MW-5 and MW-8 which are all generally down gradient of the Texaco dispenser island release and up gradient of the used waste oil release.

Contaminated soil associated with the new oil UST in the western area of the Property was

removed and confirmation soil samples were below MTCA Method A cleanup levels.

Area Description: The Property is located in a predominately mixed commercial/residential area of Lynnwood, Washington. The Property is located at the southwest corner of 196th Street SW and 68th Avenue West. A dry cleaner, carpet store, and parking lot occupy the adjacent property to the west. A strip mall occupies the property north across 196th Street SW. To the south, adjacent to the Property, is an apartment building.

Property History and Current Use: Prior to 1959, the Property appears to be undeveloped. In 1959, the Property was developed as a gasoline service station with continued operations until 1977. Although documentation of the infrastructure during this time period is limited, it appears that a dispenser island was located in the north central section of the Property with USTs in the northeast corner. There is no record of how the dispenser island/piping/USTs were closed.

In 1977 the Property was developed as a lube facility with Jiffy Lube taking over operations in 2004. Jiffy Lube operated the lube facility until 2006 when the facility closed. The 3,000 gallon new oil UST was closed and removed in 1995. The used oil and heating oil USTs were closed in place in 1995.

Aloha Coffee currently operates a coffee house on the Property.

Physiographic Setting: The Property is located in the lowlands of Puget Sound basin in northwestern Washington. The topography is flat and slopes gently to the south and west. The approximate elevation is 450 feet above mean sea level.

Surface/Storm Water System: Scriber Lake is approximately $\frac{3}{4}$ of a mile east of the Property. The Property is paved; surface water is collected in catch basins along the southeastern boundary of the Property which connect to city storm sewers.

Geology: The Property is located in the Puget Sound Lowlands bounded by the North Cascade Mountains to the east and the Puget Sound and the Olympic Mountain Range to the west. Soils encountered at the Site generally consist of imported fill to a depth of approximately 7.5 feet below ground surface (BGS). This is underlain by unconsolidated sediments (silts and sands with gravel and clay) characteristics of weathered till to approximately 18 feet bgs. This is underlain by consolidated, dense silts and sands with gravel and clay characteristic of unweathered till which extends to approximately 32 feet bgs (maximum depth explored).

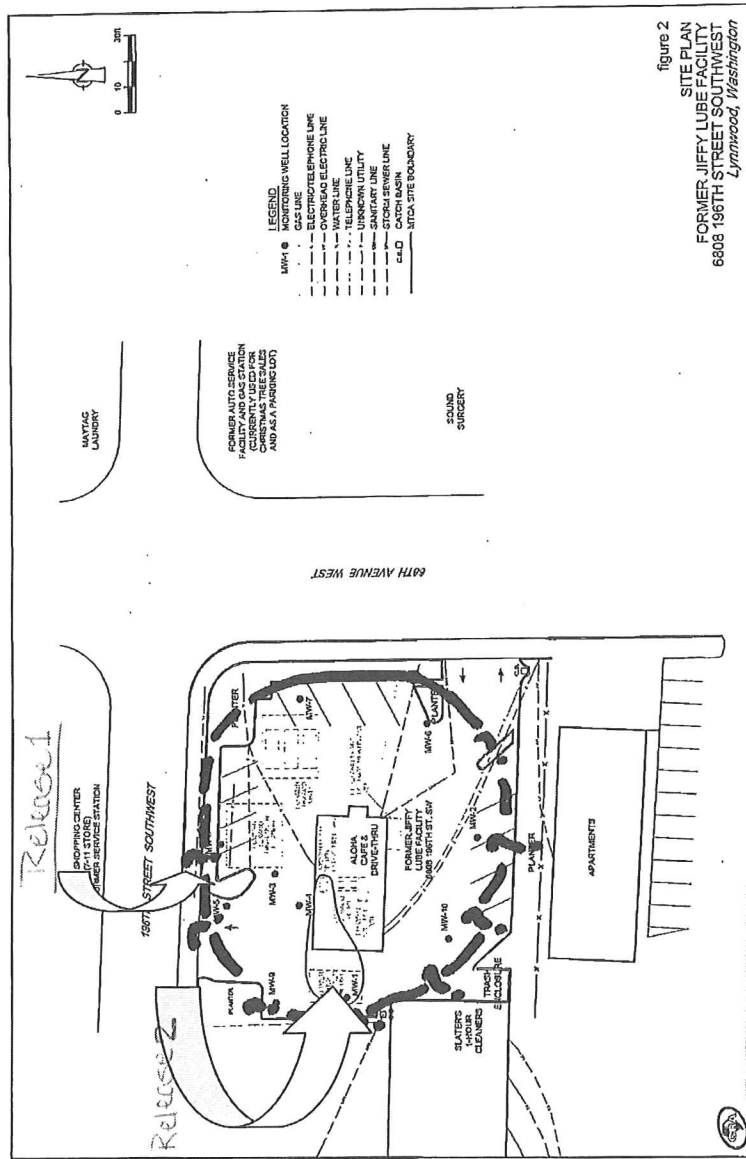
Ground Water: The Site is located within the Puget-Willamette Trough Regional Aquifer System. Depth to ground water at the Site ranges from 6.1 to 14.9 feet bgs. Ground water flow is southwest. Ten monitoring wells are located on the Property.

Water Use: The Property is provided by the Alderwood Water and Waste Water District. Drinking water is sourced from the Sultan River and the Spada Lake Reservoir. No drinking water wells are located within a $\frac{1}{2}$ mile of the Property.

Interim Actions: An interim action was conducted in 1995 which consisted of closure of USTs associated with the Jiffy Lube facility. Interim actions included:

- Removal of the new oil UST west of the building. Sixty-five tons of contaminated soil was reportedly excavated and disposed of off-site. The area was over excavated and contaminated soil observed during the tank removal was excavated and removed from the Property.
- Closure in Place of the waste oil UST and heating oil UST. TPHo contaminated soil remains at approximately 1.5 feet bgs beneath the floor of the coffee shop.

Approximate Boundary of Sites



SCALE: AS SHOWN FROM EXISTING RECORDS BY CITY ENGINEER AND DESIGNER - C.C. INC. 2/17/2011