



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 12, 2019

Tom Matson  
PO Box 1228  
Enumclaw, WA 98022

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

- **Site Name:** Tom Matson Dodge, Inc.
- **Site Address:** 2925 Auburn Way N., Auburn
- **Facility/Site No.:** 59813133
- **Cleanup Site ID No.:** 9854
- **VCP Project No.:** NW3126

Dear Mr. Matson:

Thank you for submitting documents regarding your proposed remedial action for the Tom Matson Dodge, Inc. 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 Site:

- Total Petroleum Hydrocarbons-Gasoline Range (TPH-Gx), Benzene, Ethyl-Benzene, Toluene, Total-Xylenes (BTEX) into Soil & Groundwater.

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 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):

- Blue Sage Environmental (BSE), *Remedial Investigation Site Characterization – Tom Matson Dodge*. April 6, 2017.
- BSE, *Interim Remedial Cleanup Action – Tom Matson Dodge*. April 27, 2018.
- BSE, *Groundwater Monitoring Report for 2018*. February 1, 2019.
- BSE, *Confirmation Soil, Sampling and Analysis Plan*. March 7, 2019.

These 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 calling the NWRO resource contact at (425) 649-7235 or sending an email to [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

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

The Site is more particularly described in **Enclosure A** to this letter, which also includes detailed Site diagrams. 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, Ecology has the following comments regarding the proposed BSE work plan, dated March 7, 2019:

Ecology concurs with the sampling and analysis provisions set forth in the *Confirmation Soil Sampling and Analysis Plan* (BSE, March 2019). The provisions include that advancement of ten soil borings, with continuous soil sampling at 2-, 5-, 10-, 15-, 20-, & 25-feet bgs. BSE will analyze soil samples for TPH-Gx & BTEX (BSE, March 2019). Figure 10 includes the proposed conformational soil sampling locations.

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 for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (360) 407-6834 or [jason.cook@ecy.wa.gov](mailto:jason.cook@ecy.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'J.G. Cook', with a stylized flourish at the end.

J.G. Cook, LG  
Headquarters Toxics Cleanup Program

JGC:AF

Enclosures: (1)

cc: Sonia Fernandez, Ecology  
Sandra Caldwell, Ecology

# Site Description

## **Site:**

The Site is located at 2925 Auburn Way, Auburn, and is comprised of a single King County Parcel (no. 0000460-0036), totaling 3.39-acres. The Site is currently improved with a single-story 40,339 square-foot commercial structure, constructed in 2006 (BSE, March 2019).

The Site is located within a mixed-use commercial and industrial area in Auburn, to mostly include other automobile service and sales facilities and the Auburn Municipal Airport. No single- or multi-family residences adjoining the Site. The Green River is located approximately 1.0-mile to the east of the Site (King County Department of Assessment, April 2019).

## **Property Historical and Current Use:**

Currently, the Site is occupied by an automobile sales and service facility Bud Cleary Auburn Chrysler, Dodge, Jeep, & Ram). The Site was initially developed with a similar automobile sales and service facility by 1964. Also in 1964, a 1,000-gallon underground storage tank (UST) was installed on-Site. The UST contained gasoline fuel and was decommissioned by removal in 1986. Conspicuous soil and groundwater contamination were noted. In 1988, four monitoring wells (MWs) were installed. Down-gradient MWs reportedly detected elevated TPH-Gx and BTEX constituents in both groundwater and soil. The initial automobile showroom and service facility was demolished and replaced with the existing showroom and service facility in 2006. Prior to 1964, the Site was used for agricultural purposes.

## **Surface/Storm Water System:**

No surface water features are located on the Site. The Green River is located approximately 1.0-mile east of the Site.

It is assumed stormwater is conveyed to the municipal separate storm sewer system operated and maintained under the NPDES Phase One Municipal Stormwater Permit for the City of Auburn or King County.

## **Soils and Geology:**

The Site and much of the Puget Sound Region is underlain by alluvial Quaternary sediments deposited during multiple glacial episodes. The sediments consist of interlayered alluvial clays, silts, sands, & gravels as well as intermittent peat layers. These alluvial sediments are typically situated over glacial till, primarily comprised of consolidated silts, sands & gravels.

Soils encountered at the Site generally consist of well-graded sandy-gravels to approximately 5-feet bgs, which is underlain by a well graded sand to approximately 14-feet bgs. Some areas of the Site the well-graded sand is underlain by a low-plasticity silt.

## **Groundwater:**

Groundwater is under unconfined perched conditions at the Site, and is encountered at approximately 5-feet bgs. Potentiometric maps were not supplied by BSE indicate a variable

direction in groundwater flow, ranging from divergent /away from the Site to convergent / towards the Site. Groundwater flow is also seasonally influenced (BSE, March 2019).

**Source of Contamination & Contamination Extent:**

The primary source of contamination reportedly originates from releases associated with the former gasoline UST present on the northeast corner of the property parcel from the mid-1960s to mid-to late-1980s. The single USTs associated was associated with the existing automobile dealership and service facility (Tom Matson / Bud Cleary), and was 1,000-gallons in-size (BSE, March 2019).

The presumed extent of soil and groundwater impacts is illustrated in Figures 3 to 9 (BSE, March 2019).

In 1988, Northwest Enviroservices removed the aforementioned 1,000-gallon UST. Free product and conspicuous evidence of soil and groundwater contamination were noted during UST excavation. Also in 1988, GeoEngineers advanced four MWs around the UST excavation perimeter. In addition, GeoEngineers advanced a recovery well down-gradient from the excavation in an effort to recover floating subsurface free product. Samples exhibited contaminant of concern concentrations well above their respective MTCA Cleanup Level (CULs), with benzene detected at 22,000 micrograms per liter ( $\mu\text{g/L}$ ).

In 2006 to 2007, the original showroom was replaced with a new showroom and service facility. During construction activities a water supply line was installed at approximately 6-feet below ground surface (bgs), where petroleum-contaminated soil was subsequently discovered. Tom Matson Dodge contracted Nowicki Environmental (Nowicki) to characterize the PCS. Nowicki excavated five test pits. Nowicki detected TPH-Gx and BTEX above the respective CULs, with TPH-Gx concentrations up to 4,600 milligrams per kilogram ( $\text{mg/Kg}$ ). It is unknown if groundwater was encountered or sampled during the redevelopment of the Site.

During the excavation and removal of PCS, BSE was retained to sample and characterize excavated soils. Approximately 375 cubic-yards ( $\text{yd}^3$ ) was excavated from two areas along the water main replacement run (BSE, April 2017).

In October 2015, BSE et al advanced eight soil borings, five of which were completed as monitoring wells (MWs). In February 2016, BSE et al advanced an additional 15 soil borings in the northwest corner of the property parcel, where the former 1,000-gallon UST was formally located and PCS had been observed during the aforementioned water main replacement. Soil & groundwater samples exhibited CoC detections above the respective CULs.

In May 2016 & August 2017, BSE et al completed over 200 in-situ chemical oxidation (ISCO) injections throughout the Site from 4- to 20-feet bgs. The coverage area totaled approximately 6,300 square-feet. Injection points were centered on a grid pattern over the Site (Figure 2).

From November 2015 to December 2018, BSE performed quarterly groundwater monitoring and

the existing eleven MWs. It appears as if residual benzene groundwater contamination is centered in the immediate vicinity of MW-3. CoC concentrations have been steadily decreasing and have not been detected since the June 2018 groundwater monitoring event. The remaining MWs have not exhibited detectable CoC concentrations above the respective laboratory method detection limit (MDL) or MTCA CULs.

In summary, the extent of soil and groundwater impacts have been adequately characterized. BSE submitted a sampling and analysis plan to assess the effectiveness of the aforementioned ISCO injections. BSE proposes to advance ten soil borings to over 20-feet bgs and collect soil samples. Groundwater will continue to be sampled.

## **Site Diagrams**