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May 10, 2019

Jane Anderson, P.G.
Albertsons LLC
250 E Parkcenter Blvd.
Boise, ID 83706

Re: Further Action at the following Site:

- **Site Name:** Alpine Realty Jiffy Cleaners Safeway
- **Site Address:** 312 S Lincoln St., Port Angeles, Clallam County, WA 98362
- **Cleanup Site ID:** 3209
- **Facility/Site ID:** 391383
- **VCP Project ID:** SW1642

Dear Jane Anderson, P.G.:

On April 5, 2018, the Washington State Department of Ecology (Ecology) received your request for an opinion on the independent cleanup of the Alpine Realty Jiffy Cleaners Safeway (Site). The Site was placed on the Southwest Regional Office Wait List awaiting a site manager. On January 1, 2019, the Site was removed from the Wait List and assigned a Project Manager. On February 8, 2019, your submittal was determined to be incomplete and additional items were requested. On February 15, 2019, your submittal was complete and ready for our review. This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[1] chapter 70.105D Revised Code of Washington (RCW).

Issue Presented and Opinion

Ecology has determined that further remedial action is 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, Washington Administrative Code (WAC) chapter 173-340 (collectively "substantive requirements of MTCA"). The analysis is provided below.

[1] https://fortress.wa.gov/ecy/publications/SummaryPages/9406.html

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 (TPH-G) into the soil and groundwater.
- Diesel and oil range petroleum hydrocarbons (TPH-D, TPH-O, collectively TPH-D/O) into the soil and groundwater.
- Benzene, toluene, ethylbenzene, and xylenes (BTEX) constituents into the soil and groundwater.
- Tetrachloroethylene (PCE) into soil and groundwater.
- Trichloroethylene (TCE) into soil and groundwater.
- 1,2-dichloroethene (DCE) into the soil and groundwater.
- Vinyl chloride (VC) into the groundwater.

A detailed description of the Site and history of activities can be found in the February 11, 2019, Remedial Investigation Report (the Report) by GeoEngineers, Inc. (GeoEngineers). **Enclosure A** includes a brief description of the Site, a location map, and diagram of the Site, as currently known to Ecology.

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 following documents:

1. GeoEngineers, *Remedial Investigation Report; Former Alpine Realty and Jiffy Cleaners Safeway Fuel Center Property; Port Angeles, Washington*, February 11, 2019.
2. GeoEngineers, *Groundwater Monitoring Report – December 2018; Safeway Fuel Center and Adjacent Store No. 1492; Port Angeles, Washington*, February 6, 2019.
3. GeoEngineers, *Groundwater Monitoring Report – September 2018; Safeway Fuel Center and Adjacent Store No. 1492; Port Angeles, Washington*, November 14, 2018.
4. GeoEngineers, *Groundwater Monitoring Report – June 2018; Safeway Fuel Center and Adjacent Store No. 1492; Port Angeles, Washington*, July 27, 2018.
5. GeoEngineers, *Groundwater Monitoring Report; Safeway Fuel Center and Adjacent Store No. 1492; Port Angeles, Washington*, June 8, 2018.

6. Kane Environmental, Inc. (Kane), *UST Removal and Independent Remedial Action; Alpine Realty/Jiffy Cleaners Property; 312 South Lincoln Street; Port Angeles, Washington*, November 5, 2003.

7. Kane, *Contained-Out Request; 312 South Lincoln Street; Port Angeles, Washington*, letter, addressed to Ms. K Seiler; Section Supervisor; Hazardous Waste and Toxics Reduction Program, September 12, 2002.

8. ADaPT Engineering, Inc. (ADaPT), *Limited Phase II Environmental Site Assessment; 312 Lincoln Street; Port Angeles, Washington*, letter, addressed to Johnson, Miller, Shefler, November 30, 2001.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Information on obtaining those records can be found on Ecology's public records requests web page.[4] Some site documents may be available on Ecology's Cleanup Site Search web page.[5]

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 February 2019 Remedial Investigation Report and Groundwater Monitoring Reports submitted by GeoEngineers demonstrate that the extent of contamination has not been fully defined for both soil and groundwater at the Site. A Site is defined as the "…area where a hazardous substance…has been deposited, stored, disposed of, or placed, or otherwise come to be located,"[6] and not just the extents of the contamination that exceeds the proposed or established screening level or cleanup level (CUL).

The following data gaps are still present for soils at the Site:

- PCE and its degradation daughter products (TCE, DCE, and VC) east, south, and west of sampling point GP-01/MW-1, and at depths deeper than 17 feet below ground surface (bgs) in the vicinity of sampling point GP-01/MW-1.

[4] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[5] https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx
[6] WAC 173-340-200 (https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-200)

- PCE east and south of sampling point GEI-5/MW-5, at depths deeper than 51 feet bgs in the vicinity of sampling point GEI-5/MW-5.
- TPH-G, TPH-D/O, and BTEX north, east, and south of sampling points GP-03 and GEI-4/MW-4.
- TPH-G, TPH-D/O, and BTEX east and south of sampling point GEI-5/MW-5.
- TPH-G, TPH-D/O, and BTEX in the vicinity of the dispenser islands.
- Lead has not been sampled in soil.
- Polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and metals (cadmium, chromium, nickel, and zinc) associated with the hydraulic lifts and waste oil tank have not been invetigated.

The following data gaps are still present for groundwater at the Site:

- PCE and its degradation daughter products (TCE, DCE, and VC) east, south, and west of sampling points GP-01/MW-1 and MW-3, specifically the down gradient extents into the S Lincoln St. and E 3rd St. corridors.
- PCE and its degradation daughter products (TCE, DCE, and VC) north, south, and west of GP-2/MW-2.
- The down gradient extents of petroleum related contamination relative to wells GP-1/MW-1, MW-3, GEI-4/MW-4, and GEI-5/MW-5.
- Lead has not been sampled in groundwater.
- PAHs, PCBs, and metals (cadmium, chromium, nickel, and zinc) associated with the hydraulic lifts and waste oil tank.
- Heavy oil in the vicinity of the former waste oil tanks and heating oil tank.

The exposure pathways for the Site as Ecology currently understands them are:

Soil-Direct Contact: Complete. PCE is still present in excess of the MTCA Method A soil cleanup level (CUL) between the ground surface and 15 feet bgs in the vicinity of sample point GP-01/MW-1. This is the area located south-southwest of the retaining wall that was excluded from previous contaminated soils removal.

Soil-Leaching: Complete. PCE and its degradation daughter products (TCE, DCE, and VC) are present in groundwater at monitoring wells MW-1, MW-3, and MW-6. These wells are located in the area surrounding the PCE screening level exceedances still present in soil.

Soil-Vapor: Potentially complete. A Tier I/Tier II vapor intrusion (VI) study should be completed to determine if VI is an issue.

Groundwater: Complete. PCE and its degradation daughter products (TCE, DCE, and VC) are present in groundwater in excess of the groundwater screening levels.

Ecological: Potentially complete. An "undeveloped land" exclusion is currently being claimed under WAC 173-340-7491(1)(c). The lateral extent of the Site will need to be fully defined before the extents of contiguous undeveloped land within 500 feet of the site can be determined.

Based on a review of the available information, Ecology has the following comments:

1. Because of the Peabody Creek greenbelt area located east of the Site, it will be necessary to provide a map showing the extents of the contiguous undeveloped land that is within 500 feet of ***any*** area of the Site to support your terrestrial ecological evaluation (TEE) claim. The extents of contamination will need to be fully defined before this can be completed.

2. Contaminated soil in the upper 15 feet that exceeds the proposed MTCA Method A CULs will need to be addressed in the proposed Feasibility Study (FS). A figure showing the estimated extent of remaining contaminated soil, both petroleum and PCE, may be useful.

3. Groundwater exceedances for chlorinated solvents appears to be centered in the vicinity of the PCE contaminated soils located southwest of the "retention wall" that is indicated near the southwestern property boundary. This is also the area that was excluded from previous excavation activities. Removal or in situ remediation of contaminated soils located southwest of the retention wall may be necessary to reduce groundwater contamination to concentrations below the proposed CULs.

4. When conducting the VI evaluation of this Site, it will be necessary to report on the ***acute*** risks of TCE as part of the overall Site risk using guidelines from Ecology.[7] Consider if pregnant women or children are at risk of exposure from indoor air.

5. Lead should be included for any future soil and groundwater sampling.

6. The presence of cPAHs, PCBs, cadmium, chromium, nickel, and zinc should be determined for soil and groundwater in the vicinity of the former waste oil tanks and hydraulic lifts.

7. The presence of heavy oil in groundwater should be determined in the vicinity of the former heating oil tank.

8. Ecology recommends including comprehensive figures and tables in any future reports. Tables should include all analytical results and demonstrate the history of analytical

[7] Washington State Department of Ecology Toxics Cleanup Program, *DRAFT Vapor Intrusion (VI) Investigations and Short-term Trichloroethylene (TCE) Toxicity; Implementation Memorandum No. 22*, Publication No. 18-09-047, November 21, 2018. https://fortress.wa.gov/ecy/publications/SummaryPages/1809047.html

sampling at the Site. Figures should show the location and extents of contamination at the Site for all media.

2. Establishment of cleanup standards.

Cleanup Standards: Under MTCA, cleanup standards consist of three primary components; (a) points of compliance,[8] (b) cleanup levels,[9] and (c) applicable state and federal laws.[10]

a) Points of compliance. Points of compliance are the specific locations at the Site where cleanup levels must be attained. At this time, standard points of compliance are being applied to the Site. For clarity, Ecology provides the following table of standard points of compliance:

Media	Points of Compliance
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. (WAC 173-340-740 (6)(d))[11]
Soil- Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. (WAC 173-340-740 (6)(d))[12]
Soil-Protection of Plants, Animals, and Soil Biota	Based on ecological protection, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. (WAC 173-340-7490(4)(b))[13]
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site. (WAC 173-340-720(8)(b))[14]
Groundwater-Surface Water Protection	Based on the protection of surface water, the standard point of compliance is all locations where hazardous substances are released to surface water. (WAC 173-340-730(6))[15]
Air Quality	Based on the protection of air quality, the point of compliance is indoor and ambient air throughout the Site. (WAC 173-340-750(6))[16]
Sediment	Based on the protection of sediment quality, compliance with the requirements of 173-204 WAC.[17] (WAC 173-340-760)[18]

b) Cleanup levels. Cleanup levels are the concentrations of a hazardous substance in soil, water, air, or sediment that are determined to be protective of human health and the environment.

At this Site, MTCA Method A unrestricted cleanup screening levels for soil and groundwater were used to evaluate TPH-G, TPH-D/O, BTEX, PCE, and TCE contamination detected at the Site, and VC in groundwater. Because there are no

[8] WAC 173-340-200 "Point of Compliance."
[9] WAC 173-340-200 "Cleanup level."
[10] WAC 173-340-200 "Applicable state and federal laws," WAC 173-340-700(3)(c).
[11] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-740
[12] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-740
[13] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-7490
[14] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-720
[15] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-730
[16] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-750
[17] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-204
[18] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-760

MTCA Method A CULs established for cis-1,2-DCE, trans-1,2-DCE in soil and groundwater, or VC in soil, MTCA Method B CULs are being applied.[19] These MTCA Method A and Method B cleanup levels may be appropriate for the Site, depending on the results of the needed TEE and the completion of the remedial investigation.

c) **Applicable Laws and Regulations:** For the remedial investigation, please identify all applicable state and federal laws for the cleanup action.[20] This requirement may impact cleanup standards applicable to the Site.

3. Selection of cleanup action.

Ecology has determined that additional remedial investigation is necessary at the Site before selecting a final cleanup action or determining if the interim cleanup actions already performed are sufficient.

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 performed is substantially equivalent. Courts make that determination.
See RCW 70.105D.080 and WAC 173-340-545.

3. 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).

[19] WAC 173-340-700(8)(b)(i)
[20] WAC 173-340-710(2)

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 Voluntary Cleanup Program website.[21] If you have any questions about this opinion, please contact me by phone at (360) 407-6437 or at aaren.fiedler@ecy.wa.gov.

Sincerely,

Aaren Fiedler
Toxics Cleanup Program
Southwest Regional Office

AF: tm

Enclosures: A – Description and Diagrams of the Site

cc: Cris Watkins, GeoEngineers
Nicholas Acklam, Ecology
Ecology Site File

[21] https://www.ecy.wa.gov/vcp

Enclosure A

Description and Diagrams of the Site

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Site Description

The Site known as Alpine Reality Jiffy Cleaners Safeway is located west of the intersection of S Lincoln St and E 3rd St. Clallam County parcel 56115 is the source property. Contamination is also present on the adjacent parcel number 70397. The property is currently a Safeway branded fueling station associated with a Safeway grocery store. The area is a mix of commercial and residential properties.

Contaminates present on the Site include tetrachloroethylene (PCE) and its degradation daughter products, trichloroethylene (TCE), 1,2-dichloroethene (DCE) and vinyl chloride (VC), and petroleum related substances including gasoline (TPH-G), diesel (TPH-D), and oil (TPH-O) range hydrocarbons, benzene, toluene, ethylbenzene, and xylene (BTEX).

The PCE contamination is from a dry cleaner (Jiffy Cleaners) that operated on the property, and the petroleum related substances are from a former gasoline and service station (not the current gasoline station) that operated on the property. The full extent of the hazardous substances for soil, groundwater, and soil vapor has not been defined.

Reportedly, the Site consists of fill material down to depths ranging from 10 feet to 45 feet below ground surface (bgs). A native silt and clay material underlies the Site down to the maximum depths explored of approximately 50 feet bgs, and a small area of native gravels and sands was seen in one boring. Peabody Creek is approximately 600 feet to the east, the Port Angeles Harbor is located approximately 0.3 miles to the northeast, and Valley Creek is approximately 0.4 miles to the west.

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Site Diagrams

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Ecology Figure 1: Site Location

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

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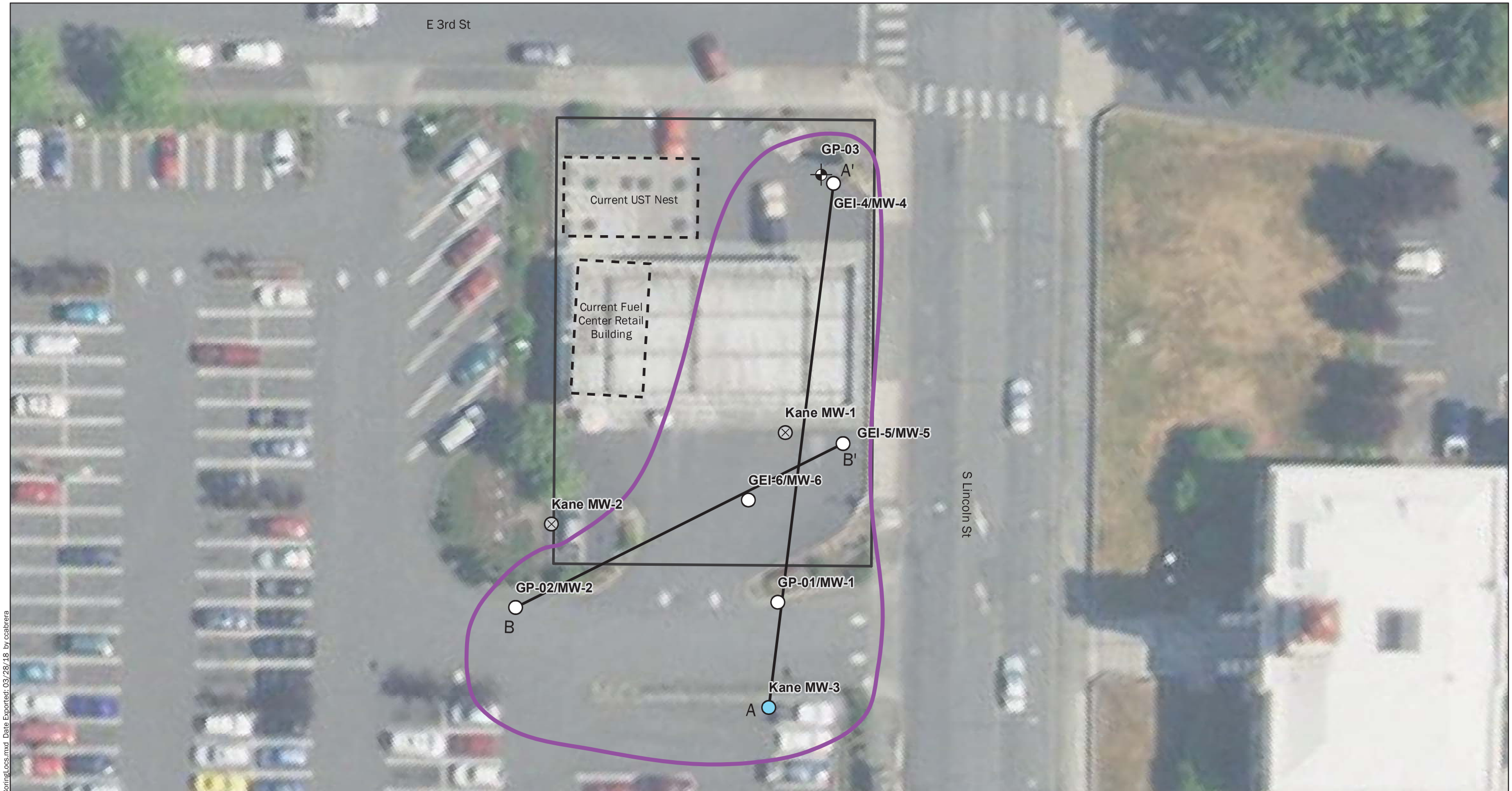
DEPARTMENT OF ECOLOGY State of Washington



Notes:

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Data Source: Imagery (2015) from Clallam County.

Projection: NAD 1983 HARN StatePlane Washington North FIPS 4601 Feet

Legend

- GeoEngineers Monitoring Well
- Existing Kane Monitoring Well
- Former Kane Monitoring Well
- GeoEngineers Soil Boring
- Approximate Site Boundary
- Fuel Center Property Boundary
- Approximate Cross Section Location

N E S W

30 0 30
Feet

Monitoring Well and Boring Locations

Port Angeles Safeway
Port Angeles, Washington

GEOENGINEERS

Figure 2

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