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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
*Northwest Regional Office ◦ 3190 160th Ave SE ◦ Bellevue, WA 98008-5452 ◦ 425-649-7000*
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June 2, 2011

Mr. Donald King
Master Halco Inc
One City Blvd W
Orange, CA 92868

**Re: No Further Action at the following Site:**

- **Site Name:** Master Halco Inc Kent
- **Site Address:** 19240 E Valley HWY S, Kent WA
- **Facility/Site No.:** 93356252
- **VCP Project No.:** NW2240

Dear Mr. Donald King:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Master Halco Inc Kent facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

## Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

**NO. Ecology has determined that no 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, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

## 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 release:

- Gasoline range petroleum hydrocarbons (tph-g) and benzene into the Soil, and Ground Water.

**Enclosure A** includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note 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:

- ***Site Characterization Investigation Conducted on Master Halco Inc***, dated October 1st 2008, prepared by Associated Environmental Group (AEG)
- ***Quarterly Groundwater Event December 2009 Report***, dated January 20th 2009, prepared by AEG
- ***Quarterly Groundwater Event – September 2009***, dated October 27th 2009, prepared by AEG
- ***Quarterly Groundwater Event – December 2009 Report***, dated March 4th 2010, prepared by AEG
- ***Final Cleanup Report***, dated January 21st 2011, prepared by AEG

Those 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 425.649.7239.

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 **no 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 sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

2. **Establishment of cleanup standards.**

   Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

groundwater at this area. All three wells were installed to a total depth of 18-feet bgs and were screened from 8-feet to 18-feet bgs. Groundwater sampling was initiated on September 12th 2008 with static water level at that time of 8.53-feet to 9.61-feet bgs.

Soil analytical results showed no concentrations of tph-g or benzene in borings MW-1, MW-2, or MW-3 above MTCA Method A cleanup levels.

Groundwater samples from all three wells taken to date have had no detectable concentrations of either tph-g or benzene.

In order to fill in groundwater data gaps, AEG installed three additional groundwater monitoring wells (MW-4, ABMW-1, and ABMW-2) in August and November 2010. No detectable concentrations of chemicals of concern were detected in these wells since their installation.

It appears that natural attenuation via biodegradation of petroleum hydrocarbons in soil and groundwater have progressively occurred at the Site.
Soil and groundwater data has demonstrated that the remedial activities performed at this Site have met the substantive requirements of MTCA for the remediation of this Site.

## Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List and Leaking Underground Storage Tank List].

## 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).

**Termination of Agreement**

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW2240).

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 425.649.4446 or e-mail at damy461@ecy.wa.gov.

Sincerely,

Dale R. Myers
Site Manager
NWRO Toxics Cleanup Program

dm/kh

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

cc: Ms. Yen-Vy Van
1018 Capitol Way South, Suite 201
Olympia, WA 98501

Dolores Mitchell, Ecology

# Enclosure A

# Description and Diagrams of the Site

# Site Description

The Site, the Master Halco Inc. – Kent property, is an industrial facility situated east of the intersection of E. Valley Hwy and 192nd Avenue in Kent. The property is a nearly rectangular-shaped parcel of approximately 3.49 acres in size. The property occupies King County Parcel No. 062205-9107 which is situated in Section 6 NW quadrant, Township 22N, Range 5E.

Contamination found at this Site appears to have originated from a leaking 4,000-gallon gasoline underground storage tank (UST)

**Site Geology and hydrology**
According to the *Geologic Map of Washington, Northwest Quadrant*, the Site and vicinity area is underlain by Quaternary age non-glacial alluvium deposits.

Specifically subsurface conditions at the Site generally consists of alluvium deposits comprising of moist, soft, clay to clayey silt/silt to approximately six feet bgs. These deposits are underlain by loose silty sand to soft sandy silt and poorly graded sand to approximately 25.5-feet bgs, the maximum depth explored. Perched groundwater was encountered in all borings at approximately 10-feet to 11-feet bgs during subsurface investigation activities. The nature of soils in the water-bearing zone appears to range from loose silty sand to soft sandy silt. Groundwater hydraulic flow at the Site is predominately to the south.

Garrison Creek is located adjacent to the east of the Master Halco property and forms eastern boundary of the property; however, the Green River, located approximately 7,000-feet to the west of the Site appears to be the regional discharge point for the vicinity area.

B&C Equipment Company decommissioned and removed one 4,000-gallon gasoline containing underground storage tank (UST) on July 31st, 1989. Approximately 270 cubic yards of contaminated soil was excavated and disposed of at Cedar Hills Landfill. Upon completion of excavation activities five confirmational soil samples (four sidewall samples and one bottom sample) were collected and submitted for laboratory analysis.

Soil analytical results of the bottom soil sample collected at 15-feet below ground surface (bgs), showed gasoline range petroleum hydrocarbon (tph-g) concentration of 25,723 mg/kg and benzene concentration of 0.48 mg/kg.

Analytical results of sidewall samples collected at 9.5-feet to 10.5-feet bgs showed concentrations of tph-g from 573 mg/kg to 11,978 mg/kg and up to 0.63 mg/kg benzene.

Groundwater was encountered at approximately 12-feet bgs. Analytical results of water grab sample showed concentrations of tph-g and benzene to be 13,000*ug*/L and 580*ug*/L respectively.

On September 10th 2008 AEG advanced three borings (MW-1 through MW-3) at the Site Borings MW-1 and MW-2 were placed at locales east and southwest of the former UST, located at the northwestern area of the Site. Boring MW-3 was placed north of the former UST excavation pit in order to assess residual petroleum contaminated soil and groundwater at this area. All three wells were installed to a total depth of 18-feet bgs and were screened from 8-feet to 18-feet bgs. Groundwater sampling was initiated on September 12th 2008 with static water level at that time of 8.53-feet to 9.61-feet bgs.

Soil analytical results showed no concentrations of tph-g or benzene in borings MW-1, MW-2, or MW-3 above MTCA Method A cleanup levels.

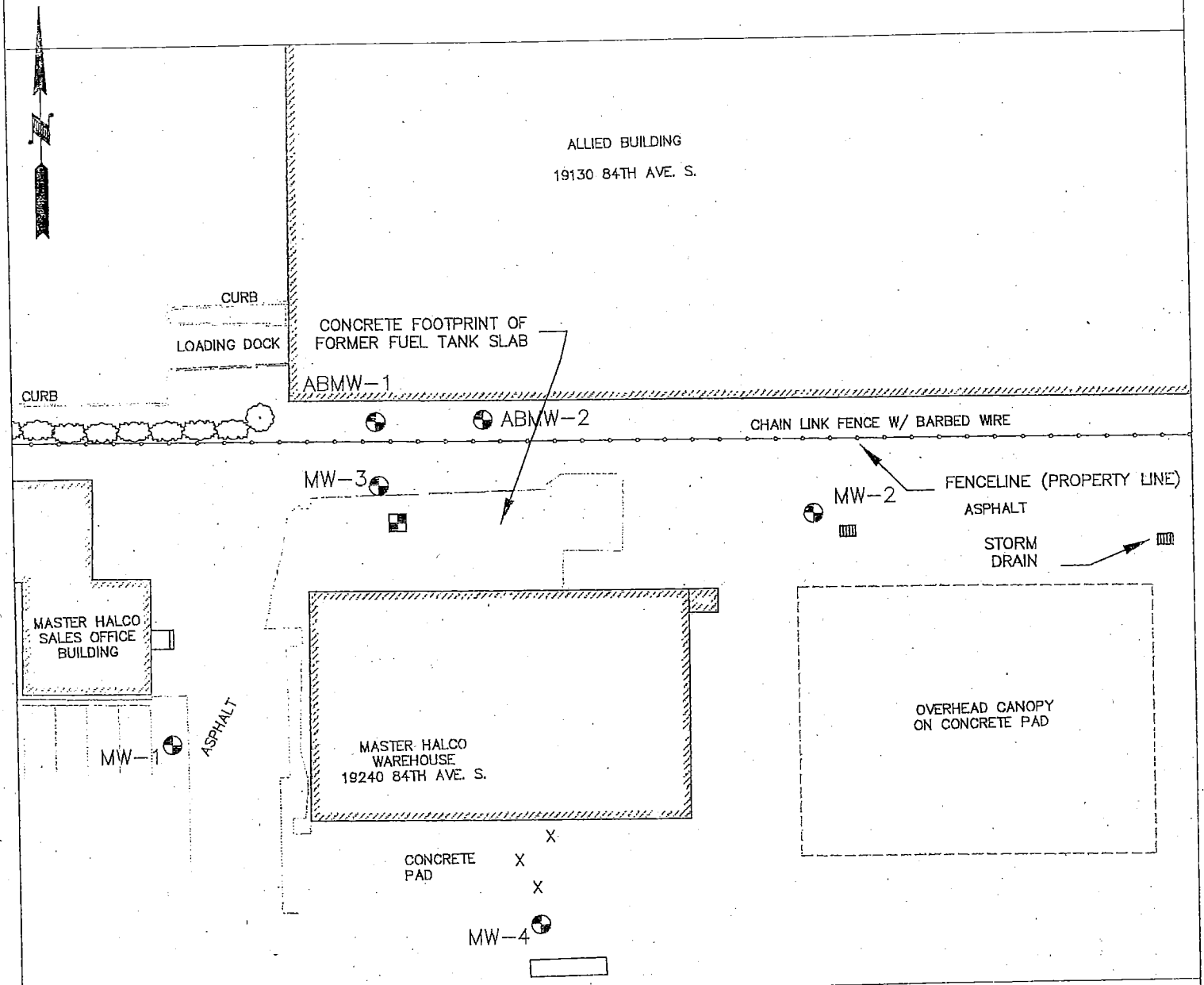
Groundwater samples from all three wells taken to date have had no detectable concentrations of either tph-g or benzene.

In order to fill in groundwater data gaps, AEG installed three additional groundwater monitoring wells (MW-4, ABMW-1, and ABMW-2) in August and November 2010. No detectable concentrations of chemicals of concern were detected in these wells since their installation.

It appears that natural attenuation via biodegradation of petroleum hydrocarbons in soil and groundwater have progressively occurred at the Site.

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.

Reference: Drawing created from drawings by PACIFIC GEOMATIC SERVICES INC., and notes provided by AEG, LLC.




## LEGEND

| | |
|---|---|
| —— T —— | UNDEDRGROUND TELECOMMUNICATION LINE |
| —— E —— | UNDERGROUND ELECTRIC LINE |
| MW-1 | MONITORING WELL INSTALLED BY AEG |
| ABMW-1 | MONITORING WELL INSTALLED ON ALLIED BUILDING PROPERTY |
| X | LOCALES OF DRILLING REFUSAL |
| | 4 INCH WELL, B&C EQUIPMENT |

DRAWING SCALE: 1"= 40'

ASSOCIATED ENVIRONMENTAL GROUP, LLC
1728 State Avenue NE, Suite 101
Olympia, WA 98506
(360) 352-9835 Fax (360) 352-8164

FIGURE 2

SITE PLAN

MASTER HALCO/ALLIED BUILDING
19240/19130 84th Ave. S.(E. Valley Hwy)
Kent, WA

| | |
|---|---|
| Project# 08-176 | Date: 1/4/11 |
| File: FILE NAME | Sheet 2 OF 2 |