



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 7, 2020

Mike Raskin
MJR Development
6725 116th Avenue NE, Suite 100
Kirkland, WA 98033

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

- **Site Name:** Meeker Gas Station Former
- **Site Address:** 105 N Washington Ave, Kent, WA 98032
- **Facility/Site No.:** 44681713
- **Cleanup Site ID:** 2782
- **VCP Project No.:** NW3167

Dear Mike Raskin:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Meeker Gas Station Former 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

Pursuant to completion of the supplemental Site investigation work described in *Revised Remedial Investigation, Feasibility Study, and Cleanup Action Plan*, dated September 20, 2019, is additional work necessary to resolve data gaps?

YES. Ecology has determined that additional work is needed to characterize and clean up the soil and ground water contamination at the Site.

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 (TPHg), benzene, and xylenes into the Soil.



- TPHg and benzene into the 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 documents listed in **Enclosure B**. 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 completing a Request for Public Record form (<https://www.ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>) and emailing it to PublicRecordsOfficer@ecy.wa.gov, or contacting the Public Records Officer at 360-407-6040. A number of these documents are accessible in electronic form from the Site web page <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=2782>.

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

Analysis and Opinion

1. In Ecology's *Opinion on Proposed Cleanup of the following Site: Meeker Gas Station Former (Opinion Letter)*, dated September 7, 2018, Ecology has determined "your characterization of the Site is not sufficient to establish cleanup standards and select a cleanup action."

Based on a review of *Technical Memorandum*, dated February 12, 2019, and *Revised Remedial Investigation, Feasibility Study, and Cleanup Action Plan (RI/FS/CAP)*, dated September 20, 2019, Ecology has determined the following data gaps described in the 2018 *Opinion Letter* have been successfully resolved:

- A soil boring DPT-1 was advanced immediately adjacent to the historic soil sampling location C3-8'. A soil sample collected at approximately 7.5 feet below ground surface (bgs) from boring DPT-1 contained a TPHg concentration below the MTCA Method A soil cleanup level and practical quantitation limit (PQL). This sampling result confirmed that the historic TPHg exceedance detected in soil sample C3-8' has been attenuated to below the MTCA Method A soil cleanup level.
- The 2018 *Opinion Letter* indicated a data gap associated with a historic waste oil underground storage tank (UST). It is Ecology's opinion that this data gap is successfully resolved.

- A historic report indicated the presence of a waste oil UST on Site. However, the presence of the waste oil UST is not confirmed in other reports, and the waste oil UST location is not available for Ecology's review.
 - Between 1998 and 2014, selected soil and ground water samples were analyzed for diesel- and heavy oil-range petroleum hydrocarbons (TPHd and TPHo). The TPHd and TPHo concentrations were all below PQLs.
 - In August 2014, ground water samples collected from monitoring wells OW1 through OW3 were additionally analyzed for carcinogenic polycyclic aromatic hydrocarbons (cPAHs), polychlorinated biphenols (PCBs), full list of volatile organic hydrocarbons (VOCs), and lead. None of these constituents were detected above the MTCA Method A ground water cleanup levels except for benzene.
 - Therefore, Ecology concurs that no additional investigation is needed regarding the former waste oil UST.
 - The residual soil contamination is located greater than 30 feet from the current building, which is outside of the lateral inclusion zone described in Ecology's *Updated Process for Initially Assessing the Potential for Petroleum Vapor Intrusion, Implementation Memorandum No. 14*, dated March 31, 2016. Therefore vapor intrusion is not a concern for the current building.
 - The well construction logs for monitoring wells MW1 through MW4, and the well decommission logs for monitoring wells MW1, MW2, and MW4 have been provided to Ecology. Ecology has also located well construction logs for monitoring wells OW1 through OW3 in Ecology's *Well Report* database.
- 2 Based on a review of the new investigation data provided in the 2019 *RI/FS/CAP*, Ecology has determined that additional Site characterization is needed to delineate the lateral and vertical extents of the residual petroleum hydrocarbon contamination in soil and ground water.
- Residual soil contamination has extended beyond the southeast Property (tax parcel) boundary. Additional soil characterization is needed to determine the south and east boundaries of the soil contamination.
 - In June 2019, a soil sample collected at approximately 9 feet bgs in soil boring DPT-3 contained a TPHg concentration above the MTCA Method A soil cleanup level. This soil boring was installed along West Meeker Street sidewalk outside of the southeast Property boundary.
 - A historic soil sample collected at approximately 3 feet bgs from monitoring well

MW4 in March 1998 contained TPHg and benzene concentrations above the MTCA Method A soil cleanup levels. Monitoring well MW4 was located on the current West Meeker Street sidewalk. This soil sample location should be included in Figure 8 of the 2019 *RI/FS/CAP* as the residual soil contamination data point.

- Therefore, the lateral extent (to the south and east) and vertical extent (below 9 feet bgs) of the soil contamination have not been defined.
- Additional ground water characterization is needed to determine the east boundary of the ground water contamination.
 - TPHg and/or benzene concentrations were consistently above the MTCA Method A ground water cleanup levels in the ground water samples collected from monitoring well OW3, which is located at the southeast corner of the Property.
 - Ground water samples collected from historic soil borings B9, B10, DP13, and SP3 contained TPHg and/or benzene concentrations above the MTCA Method A ground water cleanup levels. These historic sampling results were not confirmed by current ground water samples or permanent monitoring wells. The ground water sampling locations B9, B10, and DP13 should be included in Figure 10 of the 2019 *RI/FS/CAP* as the ground water contamination data points.
 - The June 2019 ground water sampling event indicates ground water flows to the north and west, which is in contradiction to the historic easterly/southeasterly ground water flows. Additional ground water evaluation is needed to determine the ground water flow direction at the Site.
 - Therefore, the extent of the contaminated ground water plume is not yet defined, especially to the east.
- 3. Based on a review of the current soil and ground water data, active cleanup actions are needed to address the residual petroleum hydrocarbon contamination.
 - The 2019 *RI/FS/CAP* selected Institutional Controls (IC) with an Environmental Covenant (EC) as the cleanup action. However, due to the insufficient Site characterization and presence of off-Property contamination, Ecology does not concur with using IC as the sole cleanup action.
 - Per WAC 173-340-360(2)(e)(iii), “ . . . *cleanup actions shall not rely primarily on institutional controls and monitoring where it is technically possible to implement a more permanent cleanup action for all or a portion of the site.*”
 - Ecology recommends using active cleanup actions to address the residual soil and ground

water contamination. Due to the presence of underground utilities on the southeast corner of the Site, *in situ* cleanup actions appear to be a feasible cleanup alternative. *In situ* cleanup actions could include operation of a soil vapor extraction (SVE) system and injection of oxygen release compounds (ORC), which were discussed as Alternative 3 in the 2019 RI/FS/CAP.

- Post-remediation soil and ground water sampling should be conducted to confirm the effectiveness of the cleanup actions. The additional Site characterization that is discussed in Bullet #2 could be combined with the post-remediation sampling. For example, the east boundary of the residual contamination could be determined after the active cleanup actions, considering the difficulty to collect soil and ground water samples in Washington Avenue North (State Route 181).
4. A No Further Action (NFA) determination will be considered only after the residual petroleum hydrocarbon contamination is sufficiently characterized, and active cleanup actions are conducted to ensure a reasonable restoration time frame. An IC with an EC can be considered as a cleanup alternative after active cleanup actions have been conducted.
 5. Electronic submittal of all sampling data collected in and post-2005 into Ecology's electronic Environmental Information Management (EIM) database is a requirement in order to receive a final Ecology opinion for this Site. Ecology noticed that the most recent Site data in EIM was collected on November 12, 2015. Please submit the post-2015 data into the EIM database. Suzan Pool (email Suzan.Pool@ecy.wa.gov, or via telephone at 360-255-5773) is Ecology's contact and resource on entering data into EIM.

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-

Mike Raskin
January 7, 2020
Page 6

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).

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 web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone 425-649-7109 or email jing.song@ecy.wa.gov.

Sincerely,



Jing Song
Site Manager
NWRO Toxics Cleanup Program

Enclosures (2): A – Description and Diagrams of the Site
 B – Basis for the Opinion: List of Documents

cc: Eric Koltes, Environmental Partners, Inc.
 Sonia Fernandez, Ecology VCP Coordinator, NWRO

Enclosure A

Description and Diagrams of the Site

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions expressed in the letter.

Site: The Former Meeker Gas Station Site is defined as TPHg, benzene, and xylenes released to soil, and TPHg and benzene released to ground water at 105 Washington Avenue North in Kent, Washington (Property) (**Figure 1**). The Property consists of one King County parcel number 5436200526, which covers 1.88 acres of land on the northwest corner of the intersection of the Washington Avenue North and West Meeker Street. The Site impacted by the releases includes the southeast portion of the Property, and rights-of-way to the south and east. Currently the Site boundary is not fully defined.

Area and Property Description: The Property is located at the southeast corner of the Meeker Square shopping center. The Meeker Square shopping center includes a department store (Big Lots), a pharmacy (Rite Aid), a dry cleaners (Meeker Cleaners), restaurants (Ichi Teriyaki and Jimmy Johns), and the Washington Department of Social Health and Welfare, and is surrounded by a commercial parking lot. The Rite Aid pharmacy store and associated parking lot currently occupies the Property.

The Property is located within a commercially zoned area in Kent. The Property is bounded by Washington Avenue North to the east, with a shopping center (Crossgate Shopping Center) beyond. The Property is bounded by West Meeker Street to the south, with a Chevron-branded service station beyond. The Property is bounded to the north and west by the other portions of the Meeker Square shopping center and associated parking lots.

A second cleanup site, Meeker Cleaners (facility ID 87719977), is also located within the Meeker Square shopping center, approximately 170 feet west of the Former Meeker Gas Station Site. The Meeker Cleaners Site will be addressed separately under a VCP number NW3168 and does not affect, or is not affected by, the Former Meeker Gas Station Site.

Property History and Current Use: A grocery store historically occupied the Property from 1928 until it was burned down in September 1960. Standard Oil (Chevron) purchased the Property and constructed a gasoline service station on the southeast portion of the Property (approximately 0.4 acres in size) in 1960 and 1961. The former gasoline service station reportedly included two dispenser island canopies, one station building, and USTs that contained gasoline and waste oil. The estimated former service station boundary and the associated gasoline UST locations are depicted on **Figure 2**.

Information regarding the contents and volumes of the USTs, and the locations of the waste oil UST and dispenser islands, are not currently available. The service station reportedly operated from 1960 to 1983, at which time the USTs were removed and the station building was demolished. The Property was then primarily used for parking associated with the Meeker Square Shopping Center, until the current Rite Aid store was built in 2007.

Sources of Contamination: Based on the previous Site investigations, the petroleum hydrocarbon contamination at the Site is likely associated with the releases from the former USTs, dispenser islands, and product piping at the former service station. Petroleum hydrocarbons released to soil were initially discovered during a Phase II Site investigation in 1991; however, the release was not reported to Ecology until April 2002. The timing of the release occurrence is unknown.

Physiographic Setting: The Site is situated at an elevation of approximately 40 feet above mean sea level (amsl). The land surface in the immediate vicinity of the Site is relatively flat.

Surface/Storm Water System: The nearest surface water body is the Green River, located approximately 1,900 feet (0.35 miles) south of the Property. Surface water runoff on the Property is directed to catch basins located just outside the southern and eastern Property boundaries along West Meeker Street and Washington Avenue North.

Ecological Setting: The area surrounding the Property is zoned for commercial uses. Land surfaces on the Property and adjacent properties are primarily covered by buildings and asphalt or concrete pavement with landscaped areas.

Geology: The Site is located in the Puget Sound Lowlands physiographic province, a broad north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. Surficial geology is dominated by Pleistocene glacial alluvium with recent alluvium in river floodplains and mouths. Alluvial deposits are typically comprised of interbedded sands, silts, and gravels. The Site and the surrounding area is located within the Green River Valley, which is a low-lying valley filled with recent alluvium near the surface.

Subsurface soils encountered at the Property include poorly-graded sand from approximately 1 foot bgs to depths ranging from 6 to 9 feet bgs, followed by silty sand and poorly-graded sand with silt to the maximum depth explored of 15 feet bgs. Soils encountered beneath Meeker Street consist of silty sand to approximately 6 feet bgs, underlain by sandy silt to the maximum depth explored of 15 feet bgs.

Ground Water: Shallow ground water is present at the Site at depths ranging from approximately 7 to 10 feet bgs. Historical ground water monitoring data from 2002 to 2005 indicates ground water consistently flows to the east-southeast. However the most recent ground water sampling event in 2019 indicates ground water flows to the north and northwest.

A total of seven ground water monitoring wells have been installed at the Site: MW1 through MW4 installed in 1998, and OW1 through OW3 installed in 2002. Monitoring wells MW1 through MW4 were screened between 3 and 13 feet bgs; monitoring wells OW1 through OW3 were screened between 6 and 16 feet bgs.

Monitoring well MW4 was decommissioned in 2001 during a street widening project. Monitoring wells MW1 and MW2 were decommissioned in 2002 prior to a remedial excavation. Monitoring well MW3 was not able to be located since 2014; it appeared that monitoring well

MW3 was paved over sometime between 2005 and 2014.

Currently, three monitoring wells (OW1 through OW3) are present at the Site. Ground water samples were collected from Site monitoring wells between 1998 and 2019. The monitoring well locations are depicted on **Figure 3**.

Water Supply: Drinking water for the area is supplied by the City of Kent. The City of Kent obtains the drinking water from upland springs and wells located east of the Site on the Kent East Hill and from wells located in the Green River Valley north of the Site. The City of Kent also purchases water from City of Tacoma, which is sourced from the Green River watershed. None of these water supply sources are located within a 1-mile radius of the Property. The Property is also located outside of the 10-year time of travel wellhead protection area of all water supply wells.

According to Ecology's *Well Report* database, there are no water supply wells located within a 0.5-mile radius of the Property. The distance to the closest 10-year wellhead protection area (for East Hill Well 1) is approximately 1.2 miles east of the Property.

Release and Extent of Soil and Ground Water Contamination: Multiple environmental Site investigations and remedial activities have been conducted at the Site since 1991. The soil and ground water sampling locations are depicted on **Figure 3**. Current soil and ground water conditions are depicted on **Figure 3** and **Figure 4**, respectively.

In April 1991, four soil borings (BH1 through BH4) were advanced at the Property. These soil borings were reportedly advanced in the vicinity of former gasoline USTs and waste oil UST. Soil samples were collected between 5 and 15 feet bgs. The soil sample collected at 5 feet bgs from soil boring BH2, located within the estimated former gasoline UST basin, contained a TPH concentration of 1,800 milligrams per kilogram (mg/kg). The TPH was reportedly identified as diesel; however, no subsequent soil or ground water samples identified diesel as a contaminant of concern at this Site.

In January and March 1998, a total of 13 soil borings (B1 through B13) were advanced to total depths ranging from 7 to 10 feet bgs. Among them, soil borings B1, B3, B8, and B13 were converted to ground water monitoring wells MW1 through MW4, respectively. Soil samples were collected between 3 and 7 feet bgs. The soil samples collected at 4 feet bgs from borings B4, B8/MW2, B9, and at 3 feet bgs from boring B13/MW4, contained concentrations of TPHg, benzene, and/or xylenes above the MTCA Method A soil cleanup levels.

Ground water samples were collected from soil borings B4, B7, B9, and B10. The ground water samples from borings B4, B9, and B10 contained concentrations of TPHg and/or benzene above the MTCA Method A ground water cleanup levels.

In April 2000, one direct-push soil and ground water sampling point (DP13) was advanced near the southern Property boundary. The soil sample collected at 11 feet bgs from boring DP13 contained a TPHg concentration above the MTCA Method A soil cleanup level. The ground

water sample from boring DP13 contained TPHg and benzene concentrations above the MTCA Method A ground water cleanup levels.

In January 2002, six soil borings SP1 through SP6 were advanced at the Site for soil and ground water samples collection. Among them, soil borings SP4 through SP6 were installed along the sidewalk adjacent to West Meeker Street. Soil samples were collected from these soil borings between 2.5 and 9.5 feet bgs; ground water samples were also collected from these soil borings.

The soil sample collected at 4 feet bgs from soil boring SP3 contained a TPHg concentration above the MTCA Method A soil cleanup level. The ground water samples collected from soil borings SP3 and SP4 contained TPHg and/or benzene concentrations above the MTCA Method A ground water cleanup levels.

In April 2002, a remedial excavation was conducted to approximately 7 to 8 feet bgs in the vicinity of the former gasoline UST basin. A total of approximately 342 tons of petroleum contaminated soil was excavated and disposed of off Site. Confirmation soil samples collected at 8 feet bgs from the central bottom of the excavation (C3-8'), and at 2 and 5 feet bgs from the south sidewall of the excavation (D1south-2' and D3-5'), contained concentrations of TPHg and/or benzene above the MTCA Method A soil cleanup levels. Ground water was encountered in the excavation at approximately 7 feet bgs. Deeper excavation was limited by the saturated soil at the bottom of the excavation; additional excavation to the south was limited by the utility corridor along the southern Property boundary. ORC was mixed into the saturated soil at the bottom of the excavation to enhance the biodegradation of the residual petroleum hydrocarbons.

In May 2002, three additional monitoring wells (OW1 through OW3) were installed at the Property. Soil samples were collected between 5 and 15 feet bgs from the monitoring well borings. The soil sample collected at 5 and 10 feet bgs from monitoring well OW3 contained TPHg and benzene concentrations above the MTCA Method A soil cleanup levels.

In November 2015, three soil borings (B-7, B-9, and B-10) were advanced to a total depth of 15 feet bgs. Among them, soil boring B-10 was installed in West Meeker Street. Soil samples were collected from these soil borings between 5 and 12 feet bgs; ground water samples were also collected from these soil borings. The soil and ground water samples collected contained concentrations of TPHg, and benzene, toluene, ethylbenzene, and xylenes (BTEX) below the MTCA Method A cleanup levels.

In June 2019, three soil borings DPT-1 and DPT-3 were installed to a total depth of 15 feet bgs. Among them, soil boring DPT-1 was installed near the historic excavation bottom sampling location C3-8'; soil borings DPT-2 and DPT-3 were installed along West Meeker Street sidewalk near the historic soil boring locations SP4 and SP5. Soil samples were collected from soil borings between 7 and 9 feet bgs; ground water samples were also collected from the soil borings via temporary well screen from 5 to 15 feet bgs.

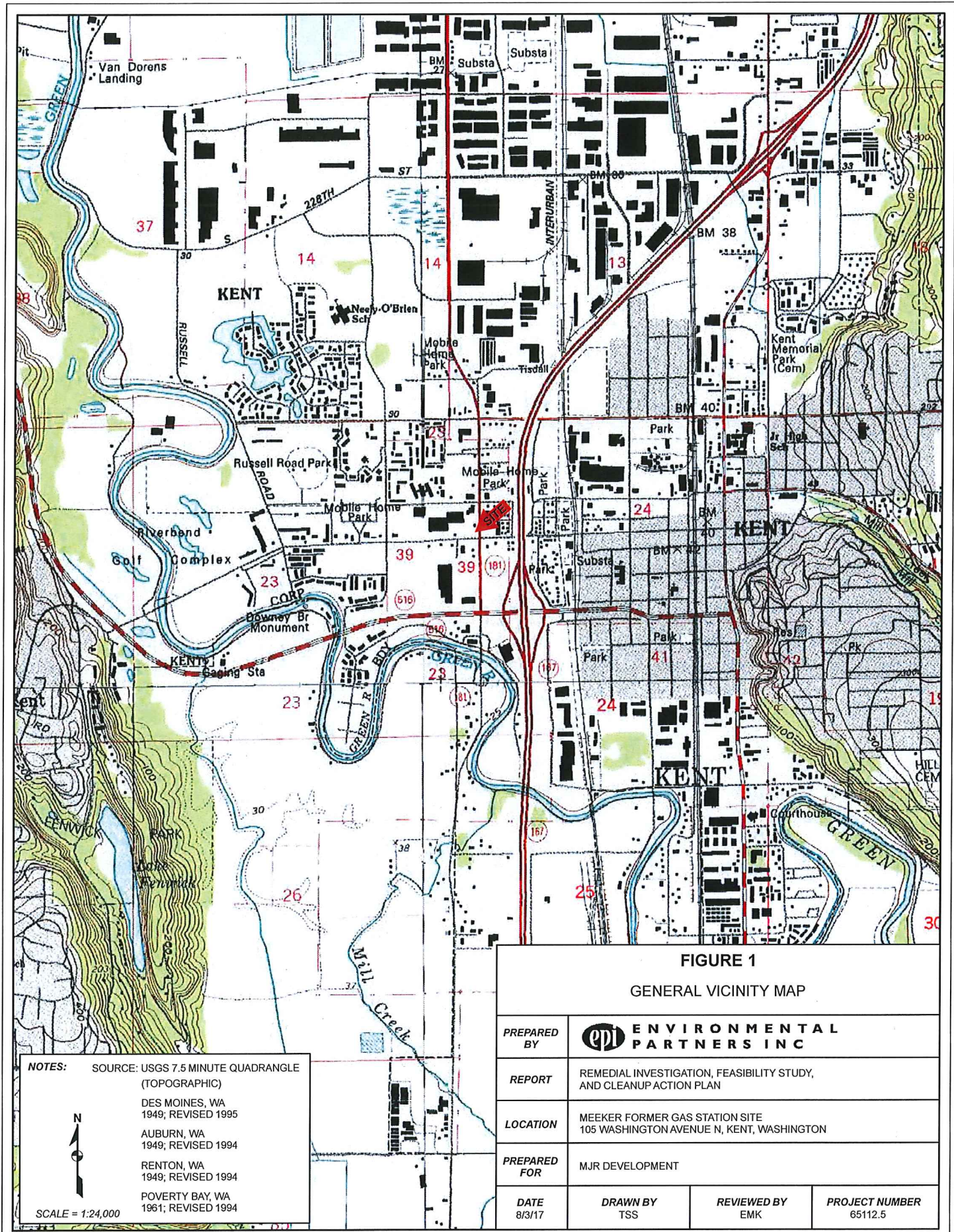
The soil sample collected from soil boring DPT-3 at 9 feet bgs contained a TPHg concentration above the MTCA Method A soil cleanup level. The ground water samples contained TPHg and BTEX concentrations below the MTCA Method A ground water cleanup levels.

Ground water samples were collected from monitoring wells MW1 through MW3 in January and April 1998, and January 2002. A ground water sample was also collected from monitoring well MW4 in April 1998. Concentrations of TPHg and benzene consistently exceeded the MTCA Method A ground water cleanup levels in monitoring well MW2, before it was decommissioned in 2002.

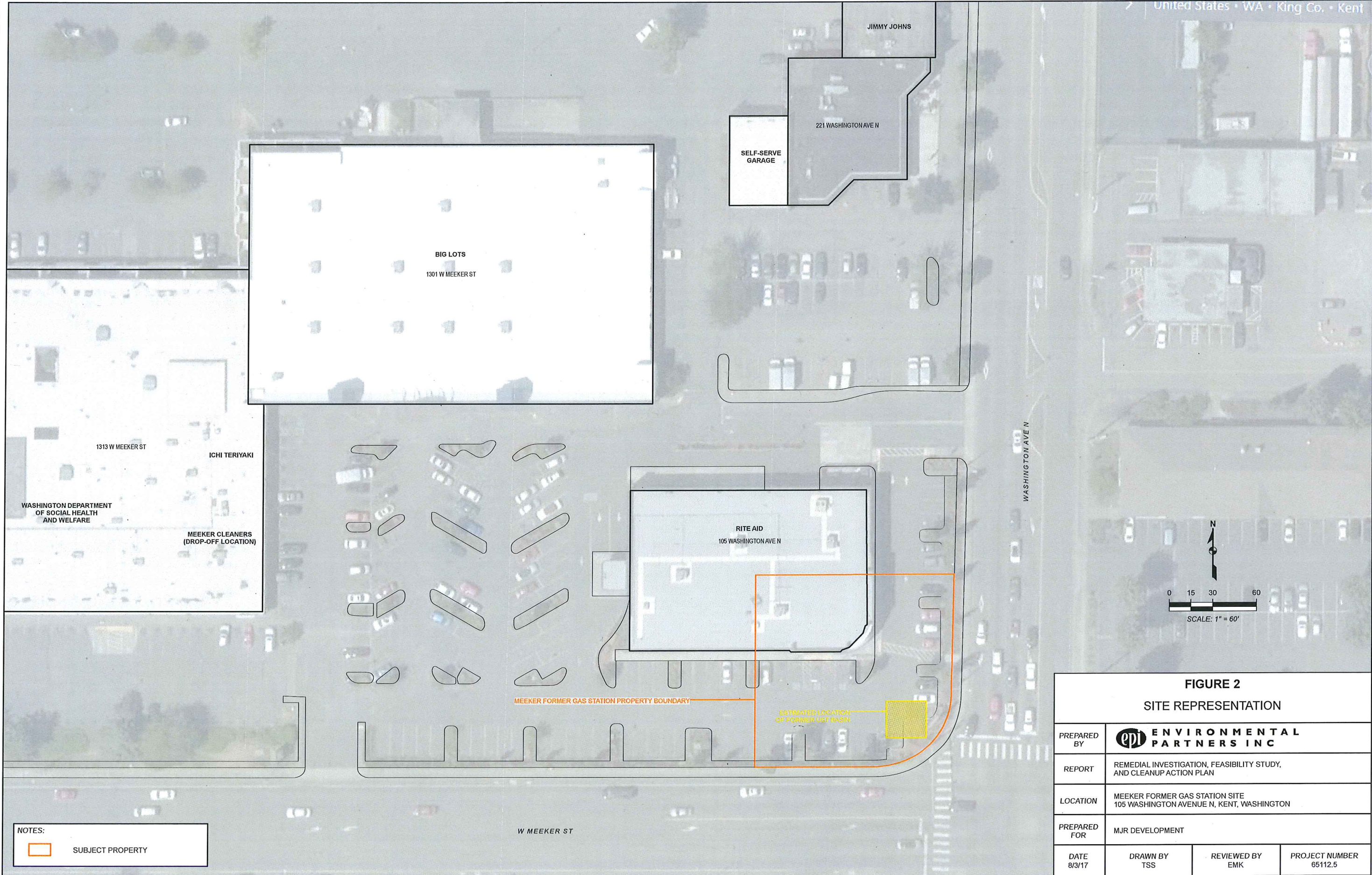
Ground water samples were collected periodically from monitoring wells OW1 through OW3, and MW-3 between June 2002 and March 2005. Ground water samples were collected from monitoring wells OW1 through OW3 in August 2014 and June 2019. A ground water sample was also collected from monitoring well OW3 in October 2018. The ground water samples collected from monitoring well OW3 consistently contained TPHg and/or benzene concentrations above the MTCA Method A ground water cleanup levels.

Site Diagrams

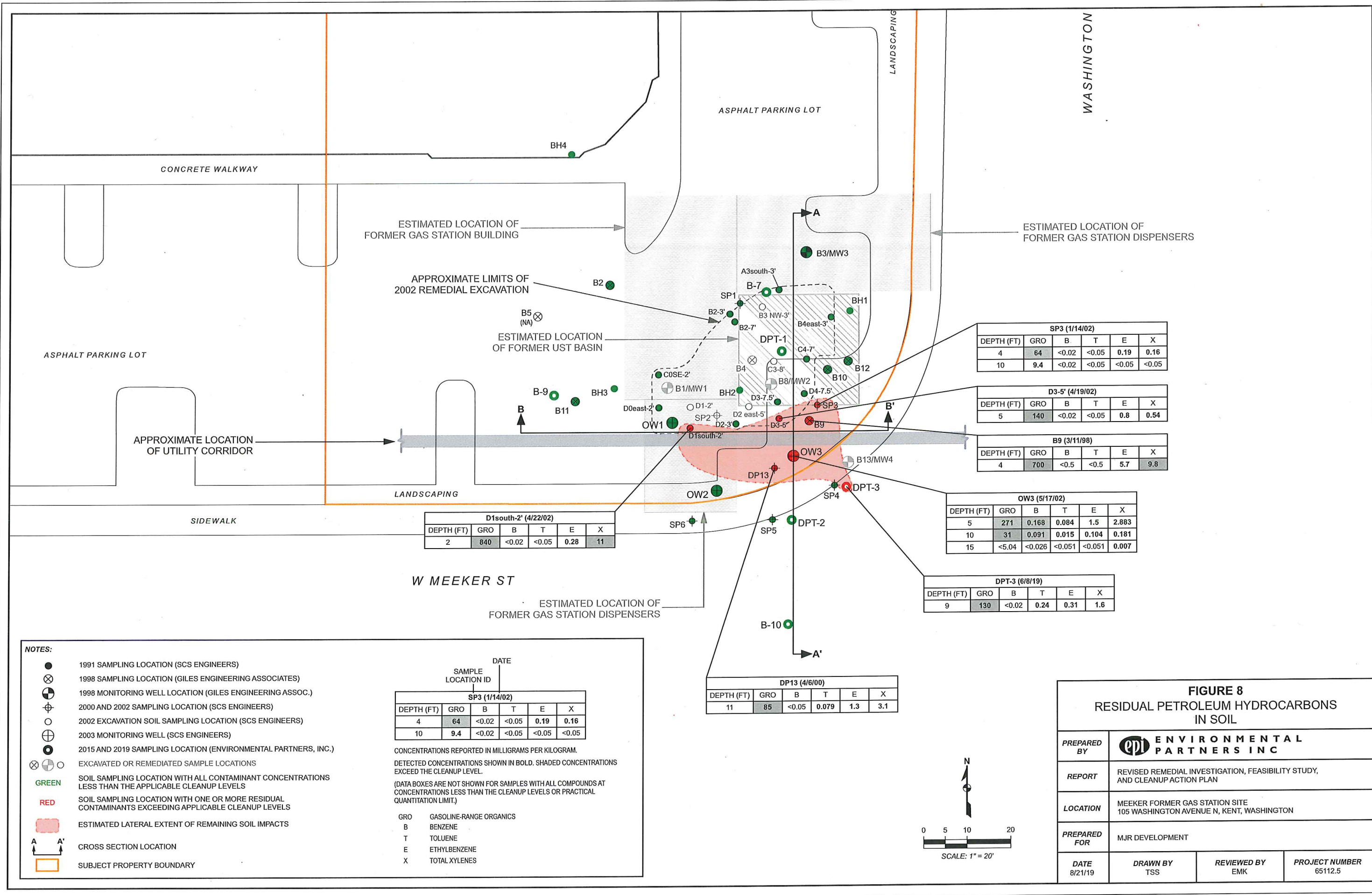
Enclosure A: Figure 1



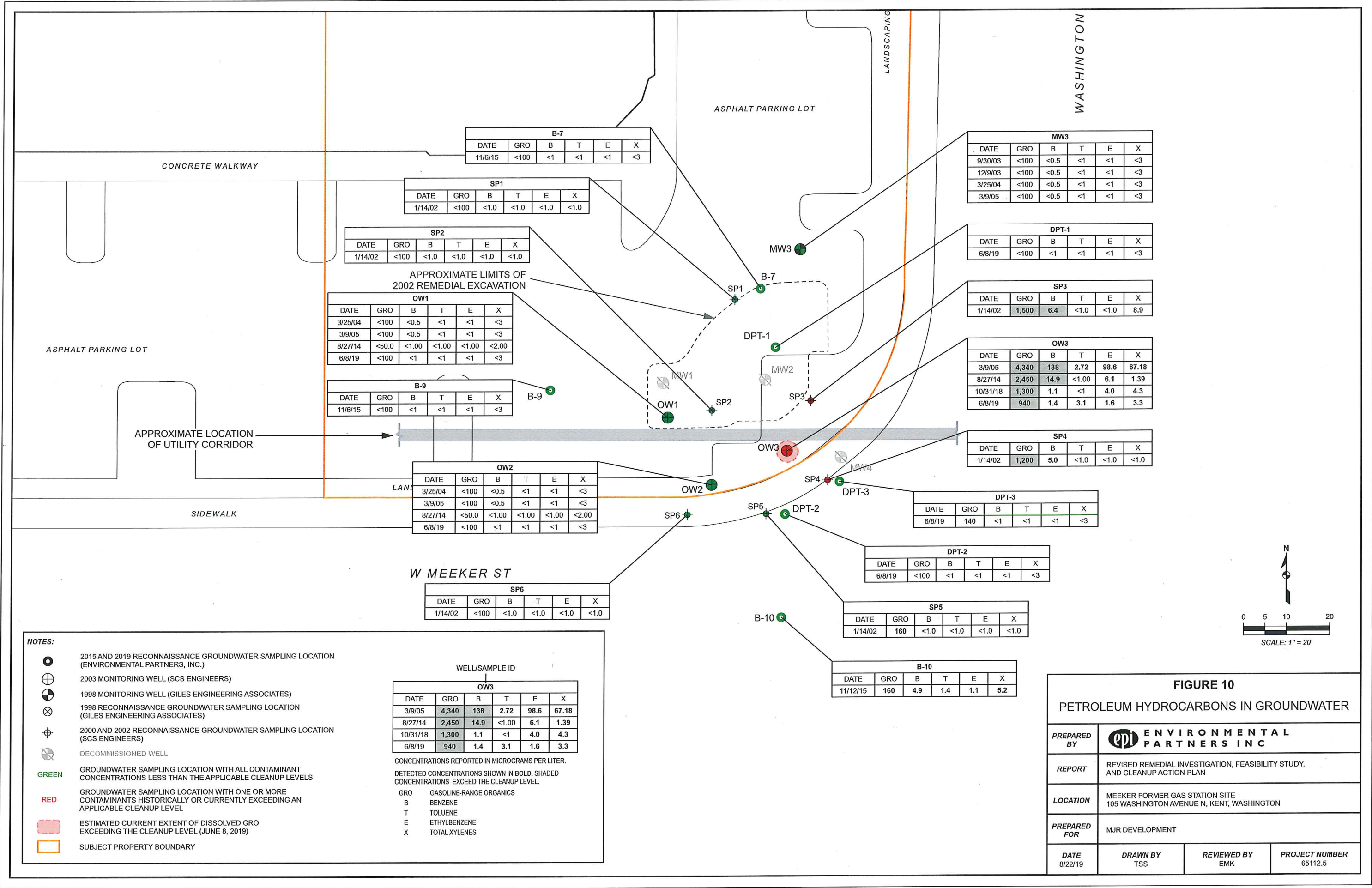
Enclosure A: Figure 2



Enclosure A: Figure 3



Enclosure A: Figure 4



Enclosure B

Basis for the Opinion: List of Documents

1. Environmental Partners Inc. (EPI), *Revised Remedial Investigation, Feasibility Study, and Cleanup Action Plan, Meeker Former Gas Station Site, 105 Washington Avenue N, Kent, Washington, VCP NW3167*, September 20, 2019.
2. EPI, *Technical Memorandum, Re: Response to Comments on Proposed Cleanup, Meeker Former Gas Station Site, 105 Washington Ave N., Kent, WA*, February 12, 2019.
3. Department of Ecology (Ecology), *Re: Opinion on Proposed Cleanup of the following Site: Meeker Gas Station Former, 105 N Washington Ave, Kent, WA 98032, VCP NW3167*, September 7, 2018.
4. EPI, *Technical Memorandum, Response to Comments on Remedial Investigation Checklist, Meeker Former Gas Station Site, 105 Washington Ave N., Kent, WA*, May 17, 2018.
5. EPI, *Remedial Investigation, Feasibility Study, and Cleanup Action Plan, Meeker Former Gas Station Site, Meeker Former Gas Station Site, 105 Washington Avenue N, Kent, Washington*, September 1, 2017.
6. EPI, *Technical Memorandum, Re: Summary of Investigation, Meeker Square Property, 1301 West Meeker Street, Kent, Washington*, February 25, 2016.
7. Migizi Group, Inc., *Memorandum, Meeker Square – 1301 West Meeker, Kent, WA, Re: Groundwater Sampling*, September 8, 2014.
8. Ecology, *Re: Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site: Meeker Gas Station Former, 105 N Washington Ave Kent WA, VCP NW0878*, June 12, 2006.
9. SCS Engineers (SCS), *Third Annual Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, June 2, 2005.
10. SCS, *Eighth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, May 12, 2004.
11. SCS, *Seventh Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, January 9, 2004.
12. SCS, *Sixth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, November 4, 2003.
13. SCS, *Fifth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, August 1, 2003.
14. SCS, *Fourth Quarter and Annual Groundwater Monitoring Report for the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, May 14, 2003.

15. SCS, *Second Quarter, Summer 2002, Groundwater Monitoring Event at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, January 10, 2003.
16. SCS, *Well Installation and Initial Groundwater Monitoring at the Former Chevron Gasoline Station Site, Meeker Square, Kent, Washington*, January 10, 2003.
17. SCS, *Voluntary Cleanup Program Soil Remediation Report – Soil Excavation and Disposal, Gasoline Remediation Project, Former Gasoline Station Site, Meeker Square Shopping Center, VCP NW0878*, July 2002.
18. SCS, *Voluntary Cleanup Program Soil Remediation Report and Request for No Further Action (NFA) Designation for Soil Contamination, Former Gasoline Station Site, Meeker Square Shopping Center (TCP Site NW0878)*, July 16, 2001.