STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
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August 7, 2020

Douglas Kunkel
TRC
1180 NW Maple Street, Suite 310
Issaquah, WA 98027

Re: Further Action at the following Site:

- **Site Name:** Frontier Village Lots 1 2 8 10 Fowlds
- **Site Address:** 813 Hwy 9 Lake Stevens, WA 98258
- **Facility/Site No.:** 18987891
- **VCP Project No.:** NW2577

Dear Douglas Kunkel:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Fowlds Cleaners 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?

YES. 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, 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:

- Tetrachloroethylene (PCE) into Soil and Ground Water.

Please note that a reported separate release containing both PCE and 1,1,1-trichloroethane (1,1,1-TCA) is present in the southwestern portion of a parcel (Parcel No. 00493400300202; *see* Figure 1 in **Enclosure A**) associated with this Site. This opinion does not apply to any contamination associated with the release containing 1,1,1-TCA. However, the presence of dissolved 1,1,1-TCA in groundwater above cleanup levels will need to be addressed at a later time.

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 calling the NWRO resource contact at (425) 649-7235 or sending an email to: nwro_public_request@ecy.wa.gov.

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.

Fowld's Dry Cleaning facility (Fowld's), which operated from the 1970s until 2001, was reportedly the primary source of the PCE impacts. Site characterization efforts in prior to 2019 had been summarized in an opinion letter issued by Ecology dated October 8, 2018. In accordance with the opinion letter, TRC conducted the following characterization activities.

Characterization Activities:

- In 2018, four additional soil boreholes W-15 through W-18 were advanced to further delineate PCE contamination in soil (Figure 2). Soil samples were collected at 5-foot intervals, starting at 5 feet (ft) below ground surface (bgs) and extending to at least 45 ft bgs. At W-15, PCE was only detected at one interval at 40 ft bgs but below its MTCA Soil Method A Cleanup Level of 0.05 micrograms per kilogram (ug/kg). PCE was detected at multiple intervals in soil boreholes W-16 through W-18, and was occasionally found above its MTCA Soil Method A Cleanup Level, with a maximum concentration of 1.2 mg/kg. The four boreholes were completed as monitoring wells.
- TRC sampled select, existing Site groundwater monitoring wells, and the above-mentioned four new monitoring wells three to four times during 2019 (Figure 3). PCE concentrations were detected above the MTCA Groundwater Method A Cleanup Level of 5 micrograms per liter (5 ug/L) in all wells except for W-16 and HLW-7. The highest groundwater PCE concentrations were found in W-17 and W-18, ranging from 210 ug/L to 250 ug/L.

Exposure Pathways:

Soil-Direct Contact:
This pathway is *incomplete*. As indicated by the testing data from soil samples collected from W-17 and W-18, and during historical remedial activities, PCE concentration in Site soil was never found to be above its MTCA Soil Method B Cleanup Level of 480 micrograms per kilogram (ug/kg)[1].

Soil-Leaching:
This pathway is potentially *complete*. The soil excavations that have happened at the Site were designed to meet the historical MTCA Soil Method A Cleanup Level for PCE of 0.5 mg/kg (circa 2005), which had been adjusted to 0.05 mg/kg for protection of potable ground water. The soil containing PCE concentrations higher than 0.05 mg/kg, which were left at the Site, continuously release PCE to groundwater, which is supported by the latest monitoring data.

Groundwater:
The pathway is *complete*. The contaminated groundwater has affected Parcel 00493400300402, and may have also affected Parcel 00518000000402. However, existing restrictive covenants established for LOT 1 and LOT 8 only restrict the use of groundwater on Parcels 00518000000502 and 00493400300202 (Figure 4).

[1] Cleanup Levels and Risk Calculation (CLARC)

Vapor intrusion:
The pathway is potentially *complete*. The groundwater monitoring results indicate the PCE concentrations are well above the Groundwater Screening Level Method B Cancer (24 ug/L)[1] at W-17 and W18, which are in close proximity to the building located within Parcel 00518000000402.

Surface Water:
The pathway is *incomplete*. No surface water features are located within the immediate vicinity of the Site.

Ecological:
This pathway is *incomplete*. Ecology concurs that no further evaluation is required (EPI, 2010) because there is less than 1.5 acres of contiguous undeveloped land on the Site or within 500 feet of any area of the Site.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels (CULs) and points of compliance (POCs) you established for the Site do not meet the substantive requirements of MTCA.

Established CULs for PCE:

Media	CUL	Basis
Soil	0.5 mg/kg	*"Lower the concentration of PCE in soil within the source area below the MTCA Method A soil cleanup level of 0.5 milligrams per kilogram (mg/kg) (the cleanup level that was in effect when remedial actions were initiated at the site in 1997) and to reduce the mass of PCE in the soil to minimize potential impacts to the shallow groundwater at the site."* (URS, 2005)
Groundwater	5 ug/L	"*Meet the MTCA Method A groundwater cleanup level of 5 micrograms per liter (µg/l)…"*(URS, 2005)

Ecology has determined the CULs for soil does not meet the substantive requirements of MTCA for the reasons listed below:

1) The current MTCA Soil Method A CUL for PCE is **0.05** mg/kg based on protection of potable ground water.
2) A CUL for air needs to be established if the vapor intrusion pathway is determined to be complete.

Established points of compliance (POCs) for PCE:

Media	**POC**
Soil- Protection of Groundwater	*"…to reduce the mass of PCE in the soil to minimize potential impacts to the shallow groundwater at the site."*(URS, 2002)

Media	POC
Groundwater	*"The proposed Compliance Monitoring well network is designed to monitor the performance of the containment remedy for Fowlds Dry Cleaner Plume at the site using data from four categories of wells. The four well categories are Upgradient (HLW-9), Source Area (HLW-14), Inter Plume (W-6) and Downgradient (HLW-2, HLW-15, and W-14)…"* (EPI, 2013)

Ecology has determined the established POCs for groundwater do not meet the substantive requirements of MTCA. Although data from the downgradient wells HLW-2, HLW-15, and W-14 have shown the PCE groundwater plume didn't expand to the east, current information is insufficient to establish POCs, as conditions to the west is unknown.

Based on a review of the above-listed documents, Ecology has the following comments:

1) As the soil to groundwater pathway and groundwater pathway are currently complete, **Ecology is hereby rescinding the Partial Sufficiency Determination issued by Ecology for PCE in Site soil, dated as March 27th, 2006.**
2) Further delineate PCE contamination in the groundwater and soil to the west of W-17 and W-18, potentially within Parcel 00518000000402. Additional groundwater information is also needed to bound the PCE plume to the north of W-15.
3) Establish a vertical gradient between aquifers utilizing existing deep wells, which are installed into the aquifer underneath the shallow aquifer. If new deep wells are needed, please be cognizant of penetrating semi-permeable layers, preventing potential down-profile migration, by implementing sealed double well-casings or other drilling techniques.
4) Summarize all available soil data in order to identify and locate soil PCE concentrations above 0.05 mg/kg, which could be the source for the PCE in groundwater. Please include, but not limited to, data derived from soil characterization activities, and conformational soil sampling events during historical cleanup efforts. This information is critical for Ecology to evaluate the completeness of site characterization and sufficiency of cleanup. Please present the data in tabular form and create cross-sections to facilitate our review.

5) Evaluate vapor intrusion pathway focusing on the building within Parcel 00518000000402 by following recommendations in Ecology's guidance[2].

6) Upon completion of site characterization, re-establish cleanup standards, including CULs and POCs for all impacted media, in accordance to MTCA, and determine if cleanup standards are met.

3. Cleanup.

Ecology has determined the cleanup you performed does not meet cleanup standards at the Site. The following cleanup activities have been conducted at the Site,

Removal of PCE-impacted soil and Source Sanitary Sewer Line:

- In 1997 Dames & Moore excavated approximately 270 tons of PCE-impacted soil. The depth of the excavation was 26 feet bgs. PCE concentrations in the conformational side-walls and base samples ranged from 0.07 to 0.22 mg/kg. An additional 140 tons of impacted soil was removed during a subsequent excavation project.
- In 1998 and 1999 Dames & Moore replaced an approximately 70 ft-long clay sanitary sewer line with PVC pipe and removed PCE-impacted soil surrounding the pipe. All seventeen soil samples collected from beneath the sewer line had detectable PCE concentrations, which ranged from 0.11 mg/kg to 2.6 mg/kg.

Chemical Oxidant Injection:

- From 2006 to 2007, EPI installed eight injection wells and injected a solution of the chemical oxidant potassium permanganate for two rounds. However, only temporary improvement in groundwater quality was observed in some site wells.
- Residual pink color in groundwater samples from some wells indicated that the chemical oxidant was still present in the subsurface. EPI concluded heterogeneous nature of the subsurface created preferential flow paths that prevented the chemical oxidant from uniformly contacting impacted groundwater (EPI, 2010).

Air Sparging (AS) and Soil Vapor Extraction (SVE):

- Between November 2002 and June 2003, an air sparging/soil vapor extraction system was installed, and reportedly removed over 60 pounds of chlorinated Volatile Organic Compounds (cVOCs), primarily PCE, from the soil and groundwater in the vicinity of the Taco Time and former Fowld's.

[2] Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action

- From 2014 to 2017, the existing SVE system closest to a hotspot within Parcel 00493400300402 was operated in an effort to reduce cVOCs. In 2017, two soil borings were installed to evaluate the effectiveness of the SVE system. CVOCs were either not detected or below their CULs.

Containment and Institutional Control:

- A restrictive covenant for Lot 1 specifies that the groundwater under Lot 1 '…cannot be used for drinking water or for human consumption' (Attachment B, CMCP 2013).
- A restrictive covenant for Lot 8 requires Ecology notification in the event that may result in direct contact or result in a release, exposure or create a new exposure pathway with PCE-impact soil or groundwater in the vicinity of a former excavation project within Lot 8 (Attachment B, CMCP 2013).

Ecology has comments listed below,

1) Due to insufficient site characterization, it is premature to evaluate the performance of cleanup actions that have been conducted so far. Re-evaluating the protectiveness will be necessary upon completion of site characterization. Additional cleanup actions might be necessary to reduce the risk and prevent contamination from migrating off the property or Site.
2) Existing restrictive covenants established for LOT 1 and LOT 8 only restrict the use of groundwater on Parcels 00518000000502 and 00493400300202. Contamination outside the area addressed by existing covenants is potentially posing risk to the environment and human health.

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).

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 at 360-407-7239 or e-mail at sam.meng@ecy.wa.gov.

Sincerely,

Sam Meng, PhD, PE
HQ Toxics Cleanup Program

SM: AF

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

cc: Sonia Fernandez, Ecology
Sandra Caldwell, Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

Site:
The Site currently impacts four Snohomish County parcels in the Frontier Village Shopping Center. The Site is covered almost entirely by slab-on-grade buildings and paved parking lots (Figure 1). The Site is located at near the intersection of State Routes-9 and -204 in Lake Stevens, Washington.

Property Historical and Current Use:
Land use at the Site and surrounding area is mixed residential and commercial. Several commercial tenants currently occupy the affected parcels. A former tenant, Fowld's Dry Cleaning, occupied a commercial building at parcel no. 00518000000502. The Fowld's building was demolished in 2003 and replaced with a new building, occupied by Great Clips in 2004 to the present.

Site Geology and Soils:
The surficial deposits in the vicinity of the Site is Vashon Till. The till consists of unsorted, compact mixtures of clay, silt, sand, and gravel, which is typically 10 to 50 feet thick. Based on boring logs of HLWs, the Vashon till was present at the surface or beneath a thin layer of fill material. The Vashon Till overlies a thick clayey unit, Transitional Beds, throughout the area.

At the Taco Time, west of the shopping center, loose sandy deposits were encountered near the surface. The deposits, which is interpreted as Recessional Outwash, consist of well-drained, stratified deposited by the stagnating and receding Vashon glacier.

Hydrogeology:
The first water-bearing zone is in the till and the advance outwash. The depth to groundwater in the till ranges between 30 and 35 feet bgs, and groundwater appears to occur under unconfined conditions. Water levels in the wells near and to the west of former Fowld's are constantly significantly higher than the water levels in the wells to the east. The difference in water levels is probably due to the presence of a perched water table within the Recessional Outwash deposits in this area. The groundwater flows to the east or southeast.

A deep well suggests there is a deeper water-bearing zone beneath the Site. This second water-bearing zone occurs within the Transitional Beds and is separated from the first water-bearing zone by approximately 40-feet of silty-clay. The nearest surface water body is the Lake Stevens approx. 0.5 mile east of the subject property.

Site Diagrams

ENVIRONMENTAL PARTNERS INC
295 NE Gilman Boulevard, Suite 201
Issaquah, Washington 98027

Figure 1
RECENT SITE CONDITIONS AND APPROXIMATE EXTENT OF FOWLDS DRY CLEANER PLUME AND OFFSITE SOURCE PLUME

PROJECT	48003.14
PREPARED FOR	PK II FRONTIER VILLAGE SC LLC KIMCO REALTY CORPORATION
LOCATION	FRONTIER VILLAGE SHOPPING CENTER LAKE STEVENS, WASHINGTON

SHEET	DRAWN BY	REVIEWED BY	DATE
1 of 1	ALW	GAM	3/15/13

SAMPLE ID	DATE	SAMPLE DEPTH	PCE
FV-W-16	4/24/19	10	**1.2**
		15	**0.029**
		20	<0.010
		25	**0.015**
		30	<0.010
		35	<0.010
		40	<0.010
		45	<0.010

SAMPLE ID	DATE	SAMPLE DEPTH	PCE
FV-W-17	4/22/19	5	<0.010
		10	<0.010
		15	**0.013**
		20	<0.010
		25	<0.010
		30	<0.010
		35	<0.010
		40	**0.016**
		45	**0.54**

SAMPLE ID	DATE	SAMPLE DEPTH	PCE
FV-W-18	4/22/19	5	<0.010
		10	<0.010
		15	<0.010
		20	<0.010
		25	**0.021**
		30	**0.015**
		35	**0.28**
		40	**0.034**
		45	**0.019**

SAMPLE ID	DATE	SAMPLE DEPTH	PCE
FV-W-15	4/23/19	5	<0.010
		10	<0.010
		15	<0.010
		20	<0.010
		25	<0.010
		30	<0.010
		35	<0.010
		40	**0.013**
		45	<0.010
		48	<0.010

APPROXIMATE LOCATION OF FORMER FOWLDS DRY CLEANER (INTERPRETED FROM 1990 GOOGLE EARTH AERIAL, AND URS FIGURES)

INTERPOLATED EXTENT OF FOWLDS DRY CLEANER PLUME, 5 µg/L ISOCONCENTRATION LINE

GREAT CLIPS

TACO TIME

PARCEL# 00518000000203

PARCEL# 00518000000502

PARCEL# 00493400300202

PARCEL# 00493400300402

PARCEL# 00493400300404

FRONTIER VILLAGE

7TH PL NE

STATE ROUTE 9

VERNON RD

HLW-1, HLW-2, HLW-3, HLW-7, HLW-9, HLW-10, HLW-11, HLW-12, HLW-14, HLW-15, HLW-16, HLW-9, HLW-10, HLW-11

W-6, W-7, W-8, W-9, W-10, W-11, W-12, W-13, W-14, W-15, W-16, W-17, W-18

AS-4, AS-5

CMW-3, CMW-4

ECI-1, ECI-2

N

0 10 20 40

SCALE: 1" = 40'

NOTES:

- HLW-9 — COMPLIANCE MONITORING AND CONTINGENCY PLAN MONITORING WELL LOCATION
- W-7 — OTHER MONITORING WELL LOCATION
- AS-4 — DECOMMISSIONED WELL
- INTERPOLATED EXTENT OF FOWLDS DRY CLEANER PLUME
- PARCEL BOUNDARY (FROM SNOHOMISH COUNTY GIS)

SAMPLE DEPTH IN FEET BELOW GROUND SURFACE

SAMPLE DATE

SAMPLE ID	DATE	SAMPLE DEPTH	PCE
FV-W-16	4/24/19	10	**1.2**
		15	**0.029**
		20	<0.010
		25	**0.015**
		30	<0.010
		35	<0.010
		40	<0.010
		45	<0.010

TETRACHLOROETHENE

BOLD RESULTS INDICATE THAT THE COMPOUND WAS DETECTED, **BOLD** RESULTS WITH SHADED BACKGROUND INDICATE THE COMPOUND EXCEEDS CLEANUP LEVELS

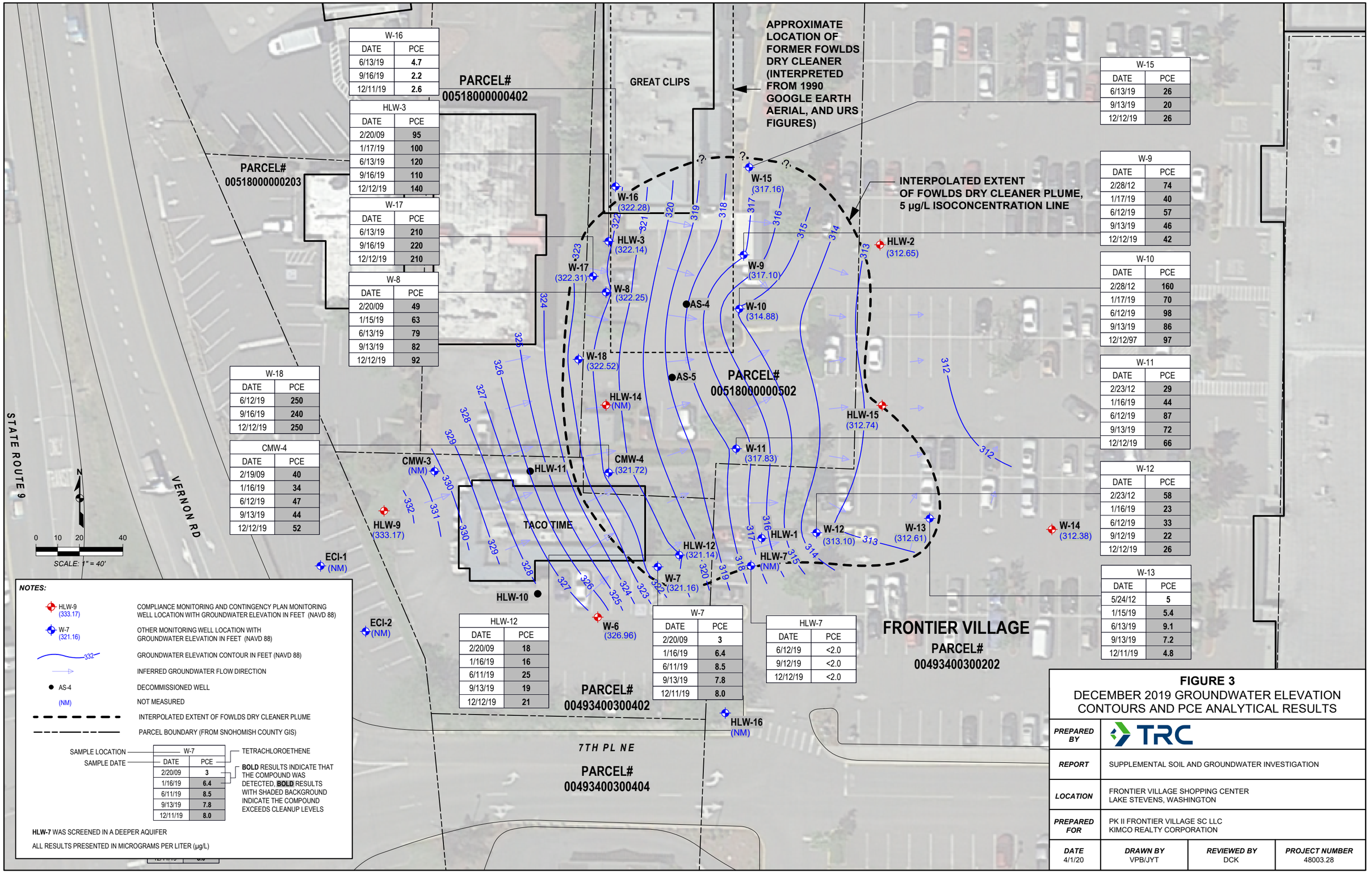
ALL RESULTS PRESENTED IN MILLIGRAMS PER KILOGRAM (mg/kg)

FIGURE 2

SOIL SAMPLING RESULTS IN BOREHOLES FOR MONITORING WELLS W-15 THROUGH W-18

PREPARED BY	TRC
REPORT	SUPPLEMENTAL SOIL AND GROUNDWATER INVESTIGATION
LOCATION	FRONTIER VILLAGE SHOPPING CENTER LAKE STEVENS, WASHINGTON
PREPARED FOR	PK II FRONTIER VILLAGE SC LLC KIMCO REALTY CORPORATION

DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
4/1/20	VPB/JYT	DCK	48003.28



W-16	
DATE	PCE
6/13/19	4.7
9/16/19	2.2
12/11/19	2.6

HLW-3	
DATE	PCE
2/20/09	95
1/17/19	100
6/13/19	120
9/16/19	110
12/12/19	140

W-17	
DATE	PCE
6/13/19	210
9/16/19	220
12/12/19	210

W-8	
DATE	PCE
2/20/09	49
1/15/19	63
6/13/19	79
9/13/19	82
12/12/19	92

W-18	
DATE	PCE
6/12/19	250
9/16/19	240
12/12/19	250

CMW-4	
DATE	PCE
2/19/09	40
1/16/19	34
6/12/19	47
9/13/19	44
12/12/19	52

W-15	
DATE	PCE
6/13/19	26
9/13/19	20
12/12/19	26

W-9	
DATE	PCE
2/28/12	74
1/17/19	40
6/12/19	57
9/13/19	46
12/12/19	42

W-10	
DATE	PCE
2/28/12	160
1/17/19	70
6/12/19	98
9/13/19	86
12/12/97	97

W-11	
DATE	PCE
2/23/12	29
1/16/19	44
6/12/19	87
9/13/19	72
12/12/19	66

W-12	
DATE	PCE
2/23/12	58
1/16/19	23
6/12/19	33
9/12/19	22
12/12/19	26

W-13	
DATE	PCE
5/24/12	5
1/15/19	5.4
6/13/19	9.1
9/13/19	7.2
12/11/19	4.8

HLW-12	
DATE	PCE
2/20/09	18
1/16/19	16
6/11/19	25
9/13/19	19
12/12/19	21

W-7	
DATE	PCE
2/20/09	3
1/16/19	6.4
6/11/19	8.5
9/13/19	7.8
12/11/19	8.0

HLW-7	
DATE	PCE
6/12/19	<2.0
9/12/19	<2.0
12/12/19	<2.0

NOTES:

HLW-9 (333.17) — COMPLIANCE MONITORING AND CONTINGENCY PLAN MONITORING WELL LOCATION WITH GROUNDWATER ELEVATION IN FEET (NAVD 88)

W-7 (321.16) — OTHER MONITORING WELL LOCATION WITH GROUNDWATER ELEVATION IN FEET (NAVD 88)

332 — GROUNDWATER ELEVATION CONTOUR IN FEET (NAVD 88)

INFERRED GROUNDWATER FLOW DIRECTION

AS-4 — DECOMMISSIONED WELL

(NM) — NOT MEASURED

INTERPOLATED EXTENT OF FOWLDS DRY CLEANER PLUME

PARCEL BOUNDARY (FROM SNOHOMISH COUNTY GIS)

SAMPLE LOCATION: W-7
SAMPLE DATE

DATE	PCE
2/20/09	3
1/16/19	6.4
6/11/19	8.5
9/13/19	7.8
12/11/19	8.0

TETRACHLOROETHENE

BOLD RESULTS INDICATE THAT THE COMPOUND WAS DETECTED, **BOLD** RESULTS WITH SHADED BACKGROUND INDICATE THE COMPOUND EXCEEDS CLEANUP LEVELS

HLW-7 WAS SCREENED IN A DEEPER AQUIFER

ALL RESULTS PRESENTED IN MICROGRAMS PER LITER (µg/L)

FIGURE 3
DECEMBER 2019 GROUNDWATER ELEVATION CONTOURS AND PCE ANALYTICAL RESULTS

PREPARED BY	TRC
REPORT	SUPPLEMENTAL SOIL AND GROUNDWATER INVESTIGATION
LOCATION	FRONTIER VILLAGE SHOPPING CENTER LAKE STEVENS, WASHINGTON
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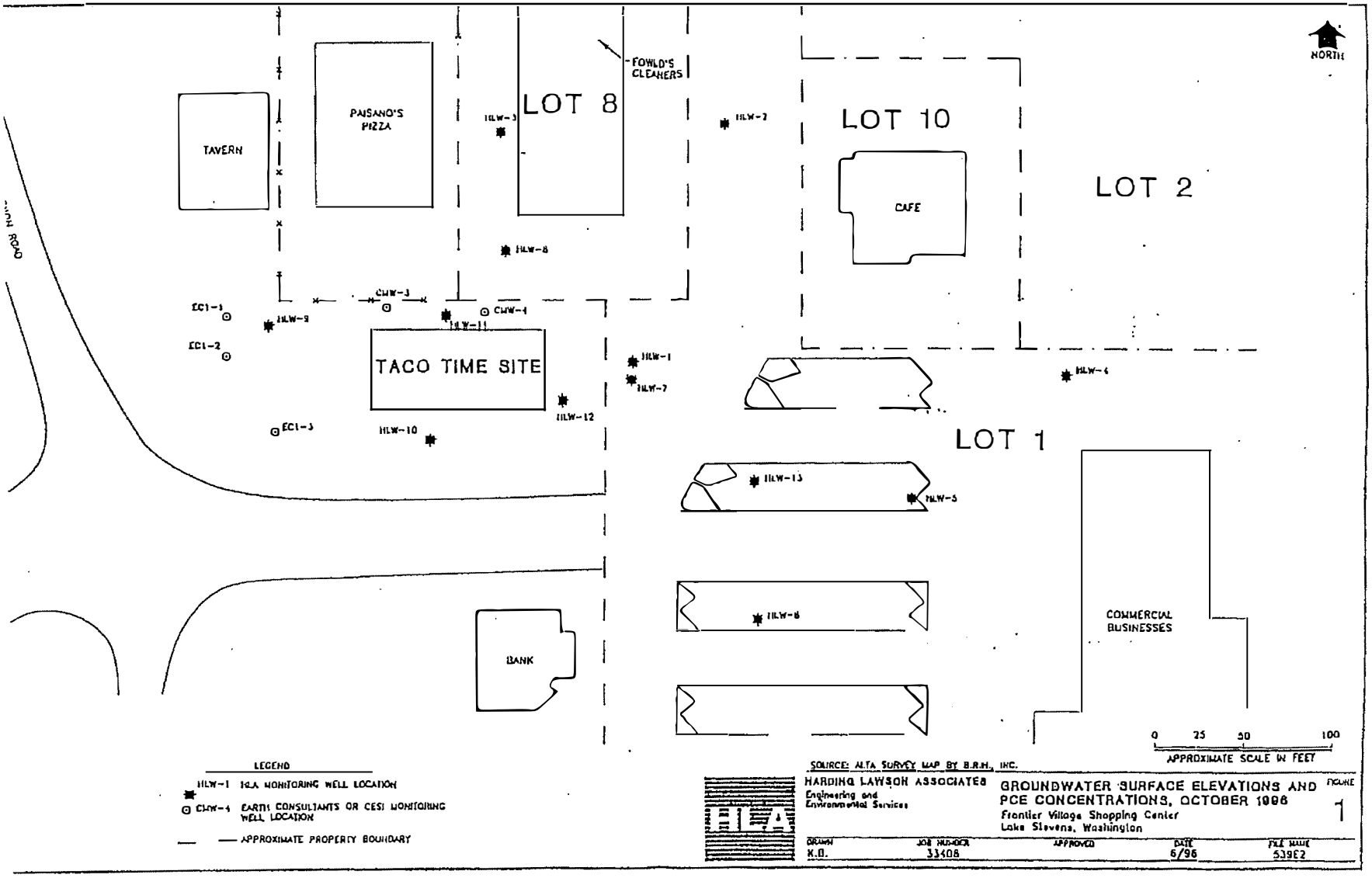

Figure 4. Lot 1 and Lot 8

Enclosure B

Basis for the Opinion:
List of Documents

Basis for the Opinion:
List of Documents

This opinion is based on the information contained in the following documents:

1. Dames & Moore, *Soil and Groundwater Investigation and Independent Remedial Action*, May 13, 1997
2. Dames & Moore, *Supplemental Independent Remedial Action*, March 26, 1999
3. URS, *Cleanup Action Plan Frontier Village Shopping Center*, March 1, 2002
4. URS, *Independent Remedial Action and Compliance Monitoring Report Frontier Village Shopping Center*, May 4, 2005
5. Ecology, *Re: Partial Sufficiency and Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site*, March 27, 2006
6. Environmental Partners, Inc. (EPI), *Summary of Cleanup Actions Performed, Selection of Future Cleanup Actions, and Formal Request for No Further Action*, March 12, 2010
7. EPI, *Compliance Monitoring and Contingency Plan*, March 18, 2013
8. EPI, *First Semiannual Compliance Monitoring and Contingency Plan Report*, January 14, 2014.
9. EPI, *Focused Shallow Soil Investigation Report*, January 14, 2014
10. EPI, *Second Semiannual Compliance Monitoring and Contingency Plan Report*, May 6, 2014
11. EPI, *Third Semiannual Compliance Monitoring and Contingency Plan Report*, November 26, 2014
12. EPI, *March 2015 Semiannual Compliance Monitoring and Contingency Plan Report*, May 21, 2015.
13. EPI, *September 2015 Semiannual Compliance Monitoring and Contingency Plan Report*, December 2, 2015
14. EPI, *March 2016 Semiannual Compliance Monitoring and Contingency Plan Report*, April 6, 2016
15. EPI, *September 2016 Semiannual Compliance Monitoring and Contingency Plan Report*, October 26, 2016
16. EPI, *March 2017 Semiannual Compliance Monitoring and Contingency Plan Report*, April 17, 2017
17. EPI, *August 2017 Semiannual Compliance Monitoring and Contingency Plan Report*, September 15, 2017

18. EPI, *Additional Focused Shallow Soil Investigation Report*, November 8, 2017

19. EPI, *March 2018 Final Semiannual Compliance Monitoring and Contingency Plan Report*, June 12, 2018

20. Ecology, *Re: Further Action at the following Site,* August 13, 2018

21. TRC Companies, Inc. (TRC), *Supplemental Soil and Groundwater Investigation Frontier Village Shopping Center*, June 19, 2020