[DATE]

Mr. Greg Helland
SCS Engineers
2405 140th Avenue NE, Suite 107
Bellevue, WA 98005

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

- **Site Name:** Dodge of Bellevue
- **Site Address:** 316 116th Avenue NE, Bellevue, Washington
- **Facility/Site No.:** 89172959
- **VCP Project No.:** NW3091

Dear Mr. Helland:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Dodge of Bellevue 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.

Note that this site – Dodge of Bellevue (NW 3091) combines two sites (Dodge of Bellevue (NW 1326) and Eastside Jeep Eagle (FSID 2497) which were originally separate sites. The November, 2004, No Further Action opinion letter issued by Ecology for NW1326 is hereby withdrawn and is replaced by this letter.

## 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 releases:

- Gasoline, diesel, oil, benzene, ethylbenzene, toluene, xylene, arsenic chromium, lead, and mercury into the soil and groundwater.

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

Please note the Bellevue Lincoln Mercury facility (# NW 0106) may also affect parcel(s) of real property associated with this Site. This opinion does not apply to any contamination associated with the Bellevue Lincoln Mercury facility.

## Basis for the Opinion

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

1. Site Investigation – Performance Dodge – Bellevue, Washington by O'Brien and Gere Engineers and dated June 1988
2. Tank Removal and Site Investigation – Performance Dodge – Bellevue, Washington by O'Brien and Gere Engineers and dated January 1989
3. Summary of the Phase I Environmental Subsurface Site Assessment – Performance Dodge – Bellevue, Washington by Ritttenhouse-Zeman and Associates and dated September 11, 1990
4. Environmental Site Assessment – Performance Dodge – Bellevue, Washington by RZA-AGRA and dated October 1990
5. Phase II Environmental Site Assessment Letter Report – Dodge of Bellevue – 316 116th Avenue NE – Bellevue, Washington by Environmental Partners and dated October 16, 2000
6. Engineering Evaluation – Dodge of Bellevue (WA6114) – 316 116th Avenue – Bellevue, Washington by Earth Tech and dated August 31, 2001
7. Environmental Site Investigation – Dodge of Bellevue – 316 116th Avenue NE – Bellevue, Washington by Earth Tech and dated November 2001
8. Site Remediation Activities Report – Dodge of Bellevue – 316 116th Avenue NE – Bellevue, Washington by Earth Tech and dated March 2003
9. Site Remediation Activities Report – Dodge of Bellevue – 316 116th Avenue NE – Bellevue, Washington by Earth Tech and dated January 2004
10. Supplemental Remedial Investigation and Soil Cleanup Report – Bellevue North Property (Former Dodge of Bellevue Site and Eastside Jeep Eagle Site) – 316 – 400 116th Avenue NE - Bellevue, Washington by SCS Engineers and dated August 3, 2016

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) 649-7024 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 **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.** Note that the characterization described prior to 2005 applies only to the original Dodge of Bellevue site.

In May of 1988, three soil borings were installed at the site. Two soil samples were tested for oil and grease and the remaining soil sample for benzene, ethylbenzene, toluene, and xylene. The results for oil and grease were 44 ppm and 4 ppm while the results for benzene, ethylbenzene, toluene, and xylene were less than 10 µg/l for each analyte. One groundwater sample was analyzed for benzene, ethylbenzene, toluene, and xylene. The groundwater results were less than 1 µg/l for each analyte. A dye test of the floor drains was also carried out.

In August of 1990, four soil borings were installed at the site and subsequently converted to groundwater monitoring wells. Two soil samples were collected from each of the four borings. All soil samples were analyzed for total petroleum hydrocarbons with one soil sample from each boring also analyzed for volatile organic compounds. The results for total petroleum hydrocarbons ranged from 6.1 to 40.3 ppm while all of the volatile organic compound analyses were less than 50 ppb. One groundwater sample was collected from each boring and analyzed for total petroleum hydrocarbons, benzene, chlorobenzene, dichlorobenzene (three isomers), ethylbenzene, toluene, and xylene. All four groundwater samples had non-detectable quantities of total petroleum hydrocarbons. Two groundwater samples had non-detectable quantities of all analytes while the remaining two samples had detectable quantities of benzene, ethylbenzene, toluene, and xylene with benzene exceeding the MTCA Method A standard in both samples.

In August of 2000, nine soil borings were installed at the site. Seven soil samples and five groundwater samples were collected. The five groundwater samples represented two new borings and three existing monitoring wells. All soil samples were analyzed for gasoline and diesel with eight of the seven analyzed for benzene, ethylbenzene, toluene, and xylene. Two soil samples were analyzed for polycyclic aromatic hydrocarbons while one of the two samples was also analyzed for volatile organic compounds and priority pollutant metals. One soil sample exceeded the MTCA Method A standard for gasoline while the same sample and a second sample exceeded the MTCA Method A standard for diesel. No volatile organic compounds or polycyclic aromatic hydrocarbons were detected in any soil sample. All metal detections were below their respective MTCA Method A or Method B standards. The five groundwater samples were analyzed for gasoline, diesel, benzene, ethylbenzene, toluene, xylene, and priority pollutant metals. No exceedances of the MTCA Method A or Method B standards for any analyte was observed except for one exceedance of the MTCA Method A standard for xylene.

In September of 2001, twelve borings were installed at the site with two soil samples being collected from each boring. The twenty-four soil samples were analyzed for gasoline, diesel, and oil. Both soil samples from one boring had exceedances of the MTCA Method A standard for oil with one of the samples also having an exceedance of the MTCA Method A standard for diesel. A soil sample from a second boring had exceedances of the MTCA Method A standards for oil and gasoline. No exceedances of the MTCA Method A standards for gasoline, diesel, or oil were found in any of the other soil samples.

In November of 2015, five direct push groundwater samples were collected and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Gasoline, benzene, ethylbenzene, toluene, and xylene were not detected in any groundwater sample. No exceedances of MTCA Method A standards for diesel or oil was observed in any groundwater samples.

**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.

<u>Soil</u>

Gasoline – 30 mg/Kg

Diesel – 2,000 mg/Kg

Oil – 2,000 mg/Kg

Benzene – 0.03 mg/Kg

Toluene – 7 mg/Kg

Xylenes – 9 mg/Kg

Ethylbenzene – 6 mg/Kg

Arsenic – 20 mg/Kg

Cadmium – 2 mg/Kg

Total chromium – 2,000 mg/Kg

Lead – 250 mg/Kg

Mercury – 2 mg/Kg

Groundwater

Gasoline – 800 μg/l

Diesel – 500 μg/l

Oil – 500 μg/l

Benzene – 5 μg/l

Toluene – 1,000 μg/l

Xylenes – 1,000 μg/l

Ethylbenzene – 700 μg/l

Arsenic – 5 μg/l

Cadmium – 5 μg/l

Total chromium – 50 μg/l

Lead – 15 μg/l

Mercury – 2 μg/l

A standard horizontal point of compliance, the property boundary, was used for soil contamination.

A standard vertical point of compliance, fifteen feet, for soils was established in the soils throughout the site from the ground surface to fifteen feet below the ground surface. Fifteen feet is protective for direct contact with the contaminated soil.

A standard vertical point of compliance, from the uppermost level of the saturated zone to the lowest depth that could potentially be affected, was used for groundwater contamination

**3. Selection of cleanup action.**

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The method selected for soil - excavation of the contaminated soil and transporting the soil off-site to a permitted facility – meets the minimum requirements for cleanup actions by providing a permanent solution, immediate restoration time frame, provides for confirmation monitoring, and protects human health and the environment.

**4. Cleanup.**

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

In August of 1988, one underground storage tank was excavated and taken off-site. The excavated soil was found not to be a dangerous or hazardous waste and was taken off-site to a Class D landfill. A layer of free product was observed on top of water in the excavation. Two soil samples and one groundwater sample were collected from the excavation. The soil samples were analyzed for F001 to F005 solvents, other solvents, and twelve total metals. The groundwater was analyzed for total petroleum hydrocarbons, benzene, ethylbenzene, toluene, xylene, and volatile organic compounds. Exceedances of the Federal health criteria for drinking water were found for benzene, ethylbenzene, toluene, and xylene.

In October of 2002, eighty-two tons of contaminated soil was excavated and taken off-site to a permitted facility. Eight confirmation soil samples were collected from the excavation and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. One of the eight samples exceeded the MTCA Method A standard for gasoline. Further analysis of the chromatogram suggested that the exceedance may be due to mineral spirits or Stoddard solvent.

In December of 2003, an additional sixty-three tons of contaminated soil was excavated and taken off-site to a permitted facility. Ten confirmatory soil samples were collected and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. No exceedances of MTCA Method A standards for any analyte were found.

In July of 2015, five hydraulic lift assemblies were excavated and taken off-site. Five confirmation soil samples were collected and analyzed for diesel and oil. Two of the five samples exceeded the MTCA Method A standards for diesel and oil. Additional contaminated soil was excavated and nineteen further confirmation samples were collected. The additional confirmation samples were analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. No exceedances of MTCA Method A standards for any analyte were observed. Eight existing groundwater monitoring wells were sampled for gasoline, diesel, oil, benzene, ethylbenzene, toluene, xylene, and volatile organic compounds. No detections of analytes above analytical limits was observed.

Between July and November of 2017, thirteen test pits were excavated as part of on-site construction. Eleven soil samples from five test pits were analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. No exceedances of MTCA Method A standards for any analyte were observed.

In October of 2015, three oil/water separators were excavated and taken off-site. Three confirmational soil samples were collected and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, xylene, arsenic, cadmium, chromium, lead, and mercury. No exceedances of MTCA Method A standards for any analyte were observed.

No groundwater remediation was performed.

## Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites 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 (NW 3091).

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 360 – 407 - 7223 or e-mail at chris.maurer@ecy.wa.gov.

Sincerely,

Christopher Maurer, P.E.
HQ - Toxics Cleanup Program

Enclosure: A – Description and Diagrams of the Site

cc: Siri Long, Bellevue 116th Avenue, LLC
Beth McKee, Ecology

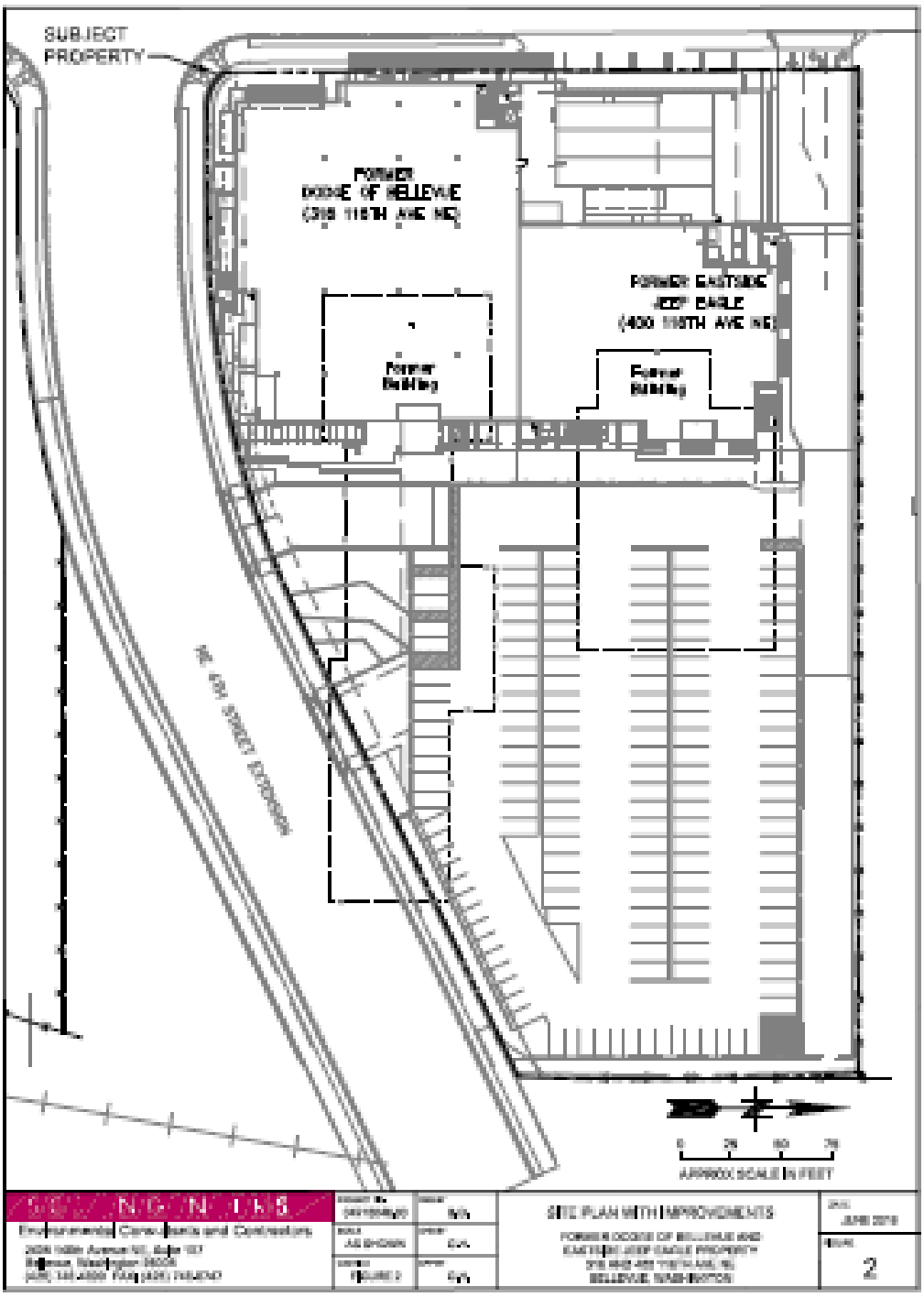
# Enclosure A

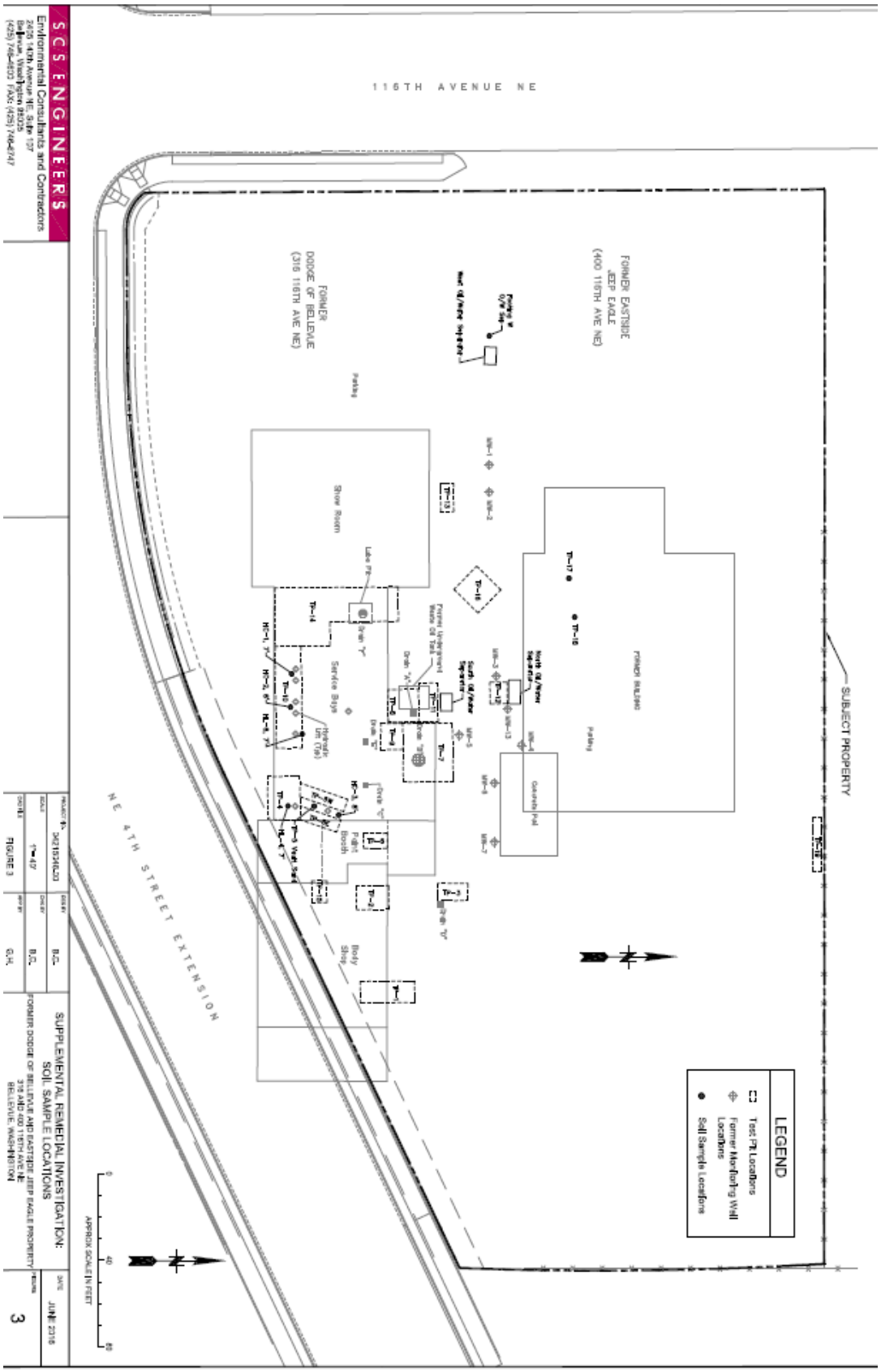
# Description and Diagrams of the Site

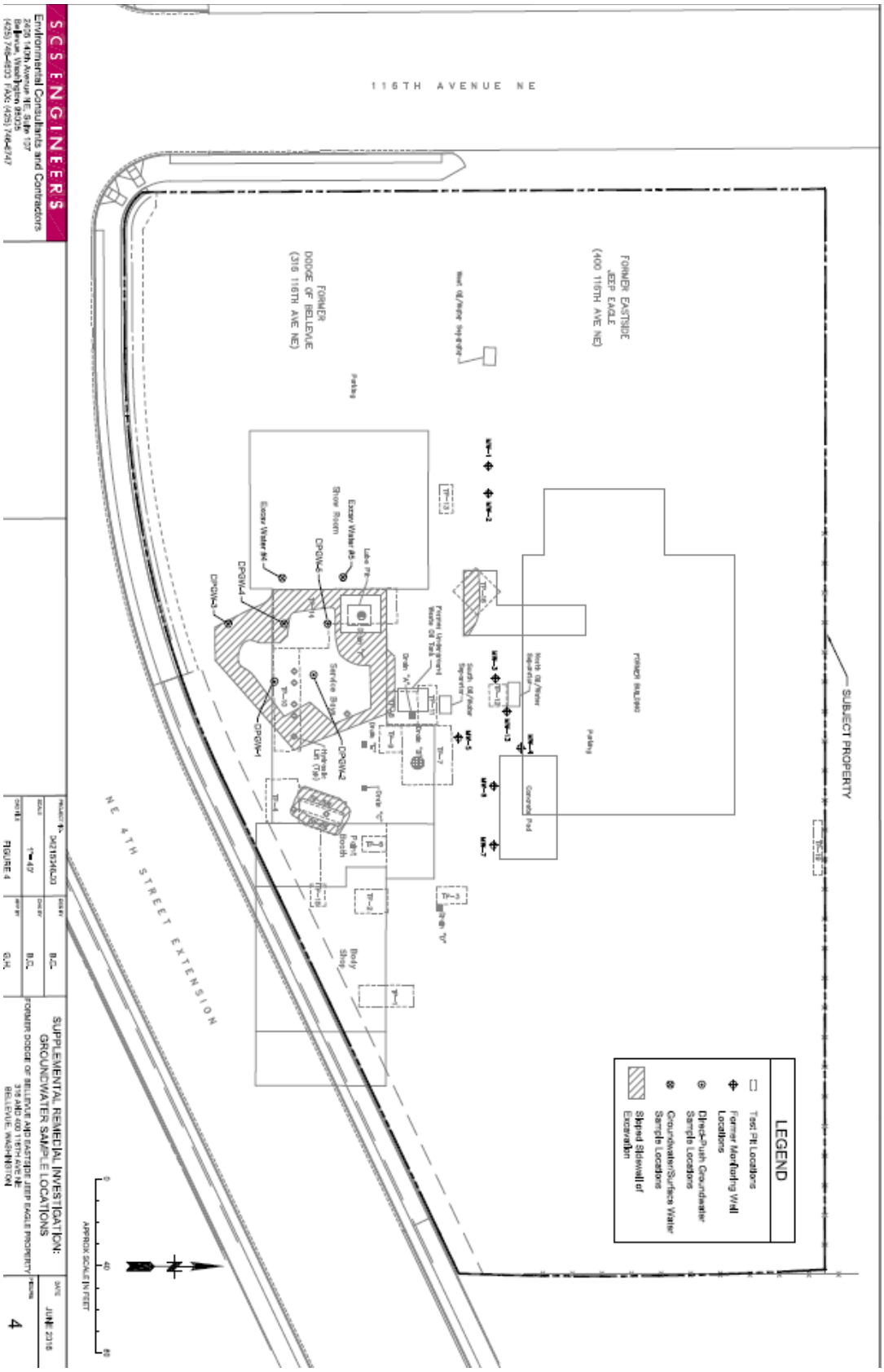
LOT B BELLEVUE BLA #15-113763LW REC #20150702900002 SD BLA BEING POR NW 1/4 OF SW 1/4 OF NW 1/4 & POR OF SW 1/4 OF NW 1/4 OF NW 1/4 STR 33-25-5

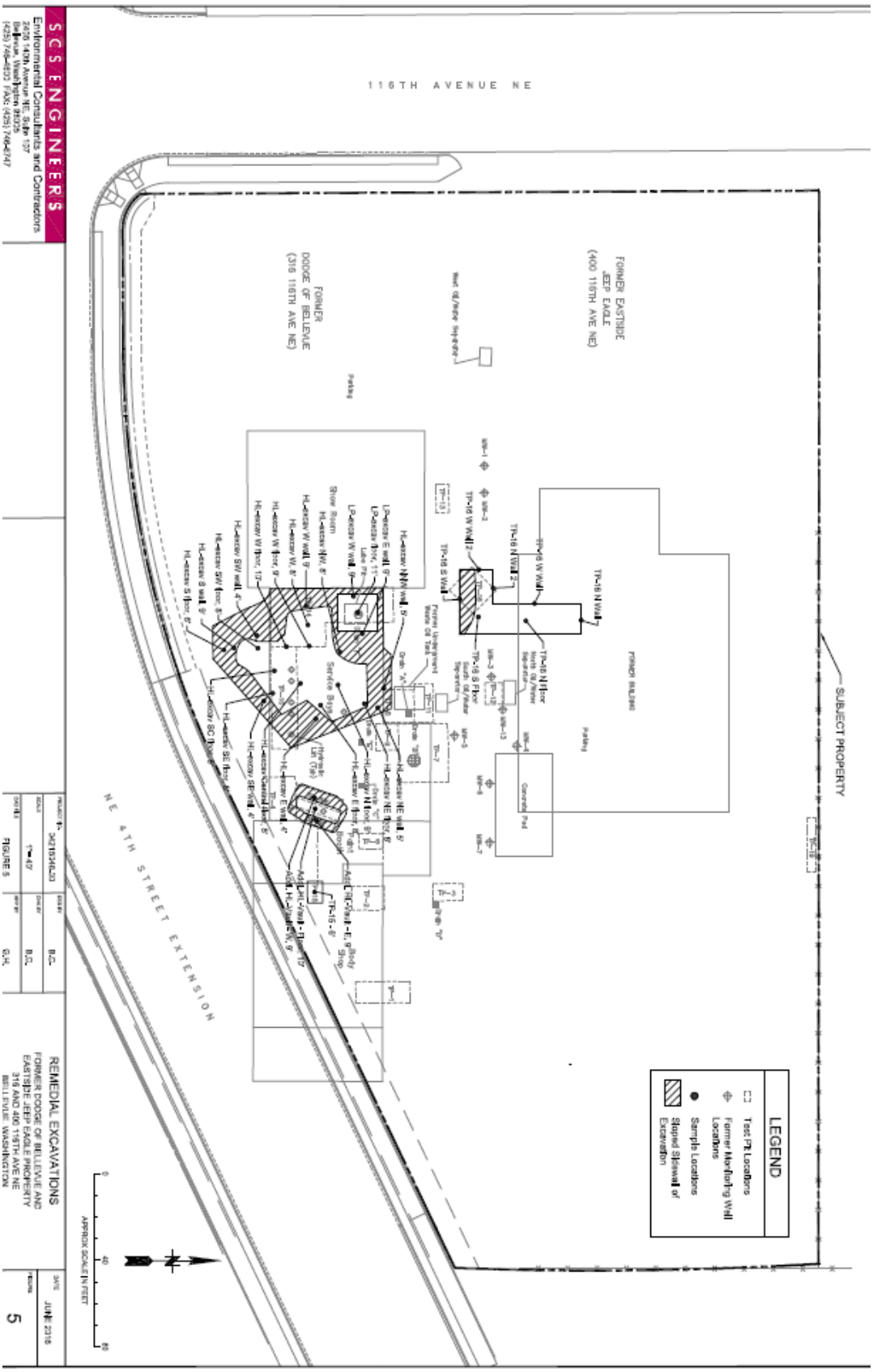

SOURCE: USGS MAP

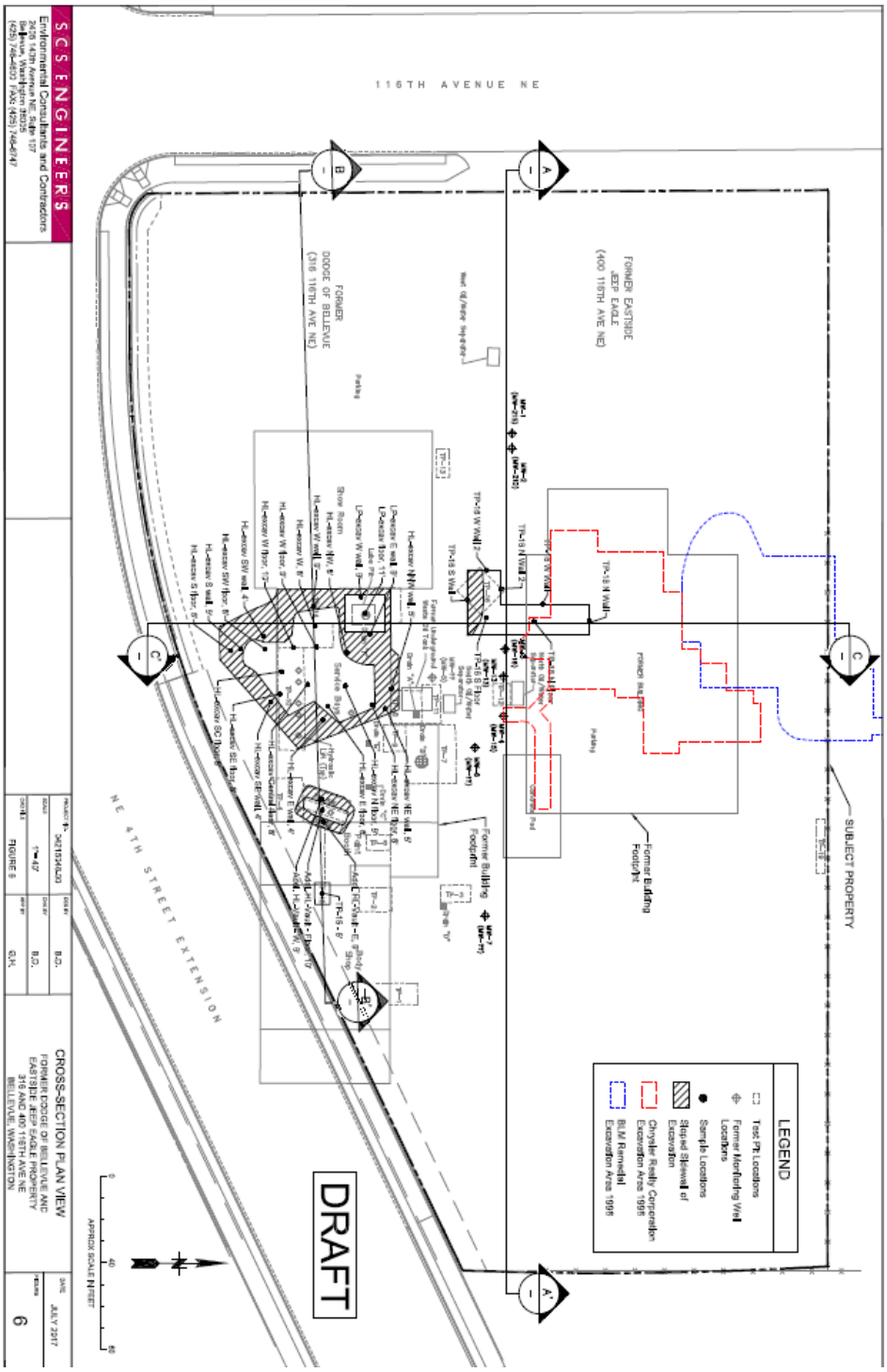
| | | | |
|---|---|---|---|
| ESA INC. Environmental Consultants and Contractors | | | SITE LOCATION MAP |

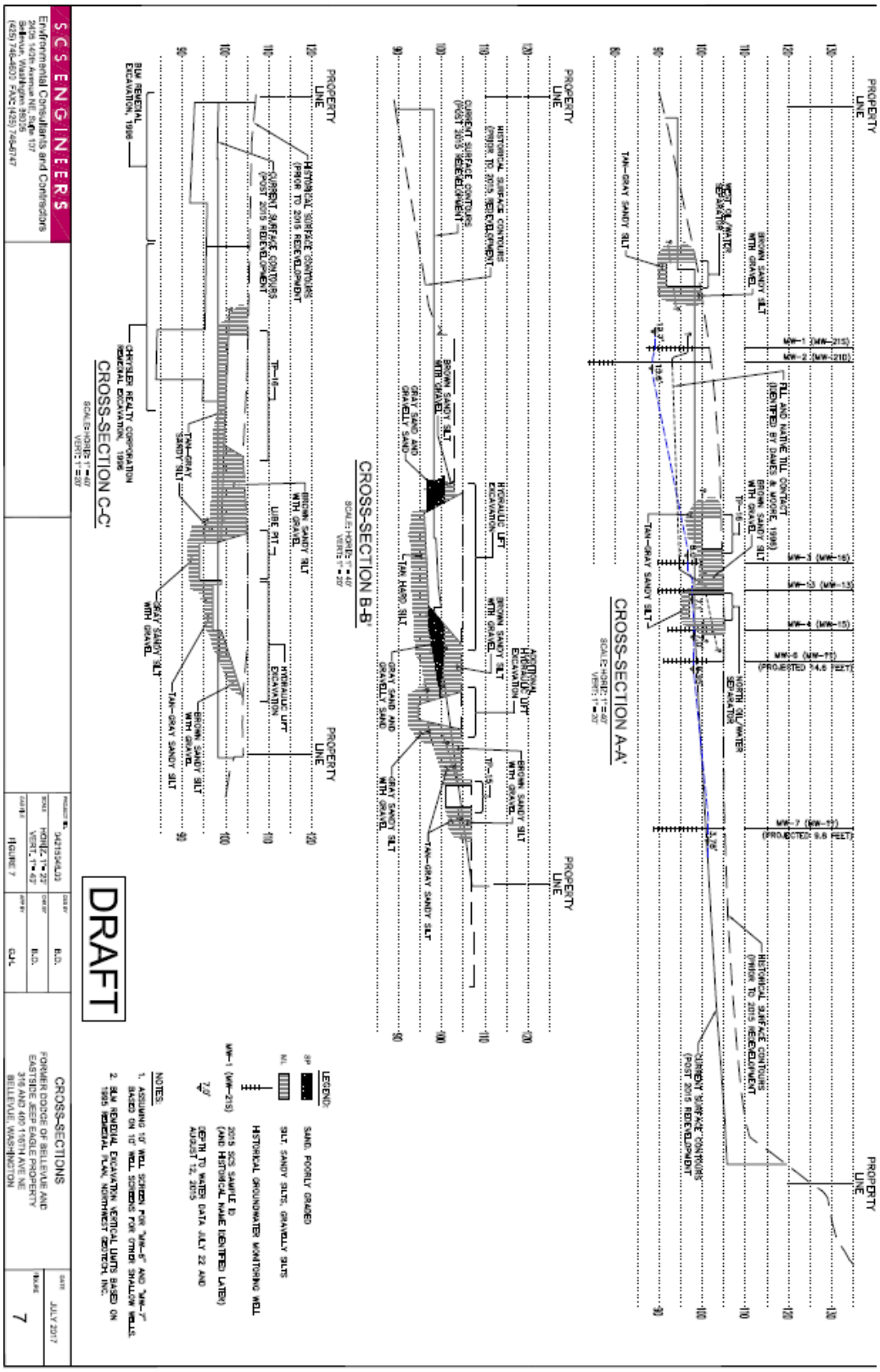

SUBJECT PROPERTY
FORMER DODGE OF BELLEVUE (315 116TH AVE NE)
FORMER EASTSIDE JEEP EAGLE (400 116TH AVE NE)
Former Building
Former Building
NE 4TH STREET EXTENSION
SCALE IN FEET
SITE PLAN WITH IMPROVEMENTS
2

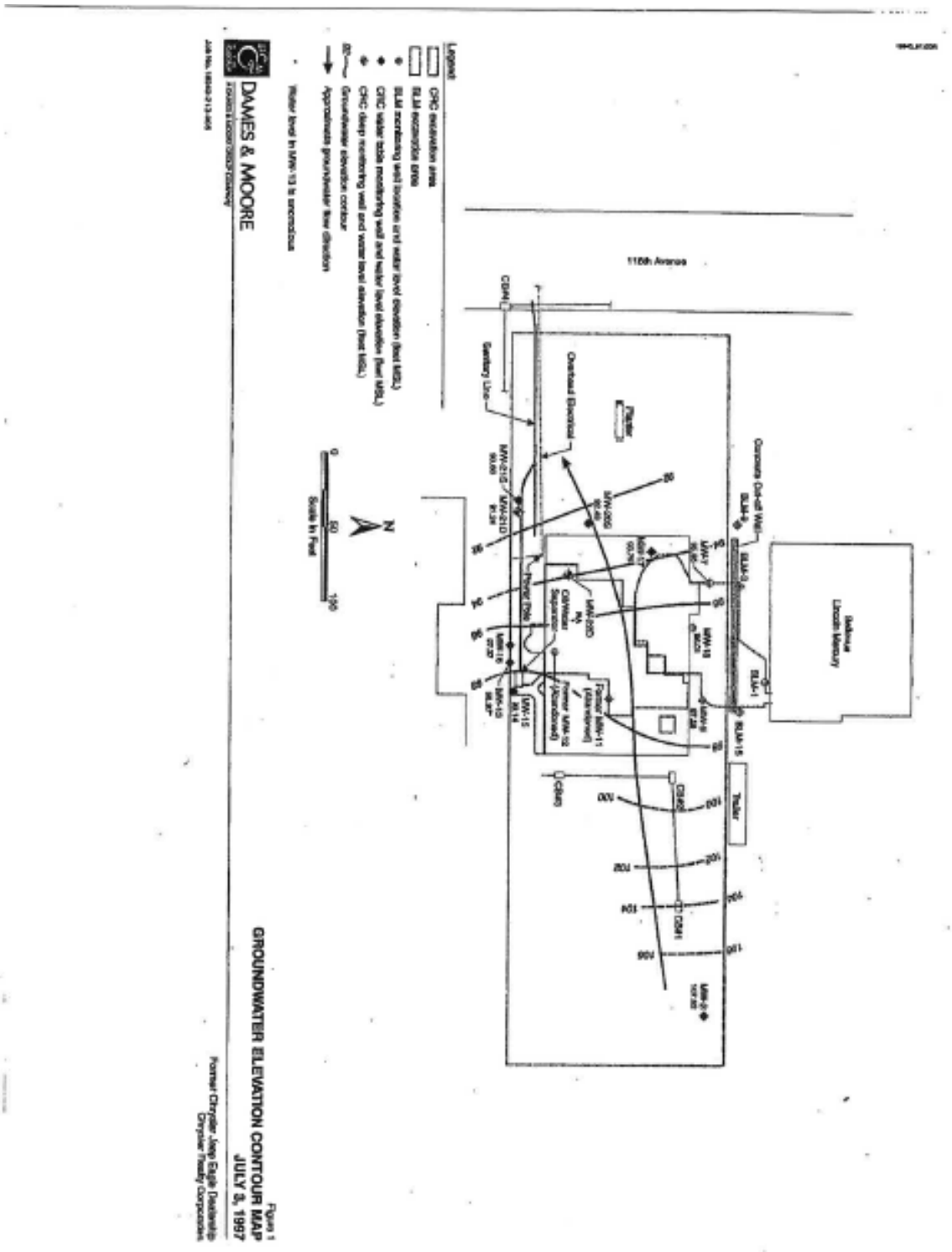

116TH AVENUE NE
NE 4TH STREET EXTENSION
SUBJECT PROPERTY
FORMER EASTSIDE JEEP EAGLE (400 116TH AVE NE)
FORMER DODGE OF BELLEVUE (316 116TH AVE NE)
Show Room
Service Bays
Body Shop
Paint Booth
Parking
LEGEND
Test Pit Locations
Former Monitoring Well Locations
Soil Sample Locations
APPROX SCALE IN FEET
SCS ENGINEERS
Environmental Consultants and Contractors
SUPPLEMENTAL REMEDIAL INVESTIGATION:
SOIL SAMPLE LOCATIONS
FORMER DODGE OF BELLEVUE AND EASTSIDE JEEP EAGLE PROPERTY
316 AND 400 116TH AVE NE
BELLEVUE, WASHINGTON
FIGURE 3
JUNE 2016


116TH AVENUE NE
NE 4TH STREET EXTENSION
SUBJECT PROPERTY
FORMER EASTSIDE JEEP EAGLE (400 116TH AVE NE)
FORMER DODGE OF BELLEVUE (316 116TH AVE NE)
LEGEND
Test Pit Locations
Former Monitoring Well Locations
Direct-Push Groundwater Sample Locations
Groundwater/Surface Water Sample Locations
Sloped Sidewall of Excavation
SCS ENGINEERS
Environmental Consultants and Contractors
SUPPLEMENTAL REMEDIAL INVESTIGATION: GROUNDWATER SAMPLE LOCATIONS
FORMER DODGE OF BELLEVUE AND EASTSIDE JEEP EAGLE PROPERTY
316 AND 400 116TH AVENUE NE
BELLEVUE, WASHINGTON
FIGURE 4
JUNE 2016
4


116TH AVENUE NE
NE 4TH STREET EXTENSION
SUBJECT PROPERTY
FORMER EASTSIDE JEEP EAGLE (400 116TH AVE NE)
FORMER DODGE OF BELLEVUE (316 116TH AVE NE)
LEGEND
Test Pit Locations
Former Monitoring Well Locations
Sample Locations
Stained Sidewall of Excavation
S.C.S ENGINEERS
Environmental Consultants and Contractors
REMEDIAL EXCAVATIONS
FORMER DODGE OF BELLEVUE AND EASTSIDE JEEP EAGLE PROPERTY
316 AND 400 116TH AVE NE
BELLEVUE, WASHINGTON
JUNE 2016
FIGURE 5


SCS ENGINEERS
Environmental Consultants and Contractors
116TH AVENUE NE
NE 4TH STREET EXTENSION
FORMER EASTSIDE JEEP EAGLE (400 116TH AVE NE)
FORMER DODGE OF BELLEVUE (316 116TH AVE NE)
SUBJECT PROPERTY
Former Building Footprint
Former Building Footprint
LEGEND
Test Pit Locations
Former Monitoring Well Locations
Sample Locations
Stepped Sidewall of Excavation
Chrysler Realty Corporation Excavation Area 1998
BLM Remedial Excavation Area 1998
DRAFT
CROSS-SECTION PLAN VIEW
FORMER DODGE OF BELLEVUE AND EASTSIDE JEEP EAGLE PROPERTY
316 AND 400 116TH AVE NE
BELLEVUE, WASHINGTON
FIGURE 6
JULY 2017
APPROX SCALE IN FEET


CROSS-SECTION A-A'
CROSS-SECTION B-B'
CROSS-SECTION C-C'
PROPERTY LINE
TAN-GRAY SANDY SILT
BROWN SANDY SILT WITH GRAVEL
GRAY SAND AND GRAVELLY SAND
GRAY SANDY SILT WITH GRAVEL
TAN-GRAY SANDY SILT
TAN MARL SILT
HISTORICAL SURFACE CONTOURS (PRIOR TO 2015 REDEVELOPMENT
CURRENT SURFACE CONTOURS (POST 2015 REDEVELOPMENT)
HYDRAULIC LIFT EXCAVATION
NORTH OIL/WATER SEPARATOR
WEST OIL/WATER SEPARATOR
TP-16
TP-15
MW-1 (MW-21S)
MW-2 (MW-21D)
MW-3 (MW-16)
MW-4 (MW-15)
MW-5 (MW-17)
MW-6 (MW-7D)
MW-7 (MW-17)
FILL AND NATIVE TILL CONTACT (IDENTIFIED BY GAMES & MOORE, 1998)
(PROJECTED) 14.6 FEET
(PROJECTED) 9.6 FEET
BLM REMEDIAL EXCAVATION, 1998
CHRYSLER REALTY CORPORATION REMEDIAL EXCAVATION, 1998
SCALE: HORIZ 1" = 40' VERT 1" = 20'
SCALE: HORIZ 1" = 40' VERT 1" = 20'
SCALE: HORIZ 1" = 40' VERT 1" = 20'
LEGEND:
SP
SAND, POORLY GRADED
SILT, SANDY SILTS, GRAVELLY SILTS
HISTORICAL GROUNDWATER MONITORING WELL
MW-1 (MW-21S)
2015 SCS SAMPLE ID (AND HISTORICAL NAME IDENTIFIED LATER)
7.0'
DEPTH TO WATER DATA JULY 22 AND AUGUST 12, 2015
NOTES:
1. ASSUMING 10' WELL SCREEN FOR "MW-6" AND "MW-7" BASED ON 10' WELL SCREENS FOR OTHER SHALLOW WELLS.
2. BLM REMEDIAL EXCAVATION VERTICAL LIMITS BASED ON 1998 REMEDIAL PLAN, NORTHWEST GEOTECH, INC.
DRAFT
SCS ENGINEERS
Environmental Consultants and Contractors
2405 140th Avenue NE, Suite 101
Bellevue, Washington 98005
(425) 746-4821 FAX (425) 746-4747
PROJECT NO. 04215042.03
DRAWN B.D.
CHECKED B.D.
APPROVED G.H.
FIGURE 7
CROSS-SECTIONS
FORMER DODGE OF BELLEVUE AND EASTSIDE JEEP EAGLE PROPERTY
316 AND 401 116TH AVE NE
BELLEVUE, WASHINGTON
DATE JULY 2017
FIGURE 7


Legend
CRQ oxidation area
SLM recognition drive
SLM monitoring well location and water level elevation (feet MSL)
CRQ water table monitoring well and water level elevation (feet MSL)
CRQ deep monitoring well and water level elevation (feet MSL)
Groundwater elevation contour
Approximate groundwater flow direction
Water level in MW-13 is anomalous
Scale in Feet
115th Avenue
Overhead Electrical
Gantry Line
Trailer
Baltimore Lincoln Mercury
Former Chrysler Jeep Eagle Dealership
Chrysler Realty Corporation
DAMES & MOORE
GROUNDWATER ELEVATION CONTOUR MAP
JULY 9, 1997
Figure 1