



i.
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

July 24, 2024

Jeff Kaspar
Farallon Consulting, LLC
975 5th Ave NW, Suite 100
Issaquah, WA 98027-2419
jeff.kaspar@farallonconsulting.com

Re: No Further Action opinion for the following contaminated Site

| | |
|-------------------|---|
| Site name: | Cornforth Campbell Motors Inc Main Facility (a.k.a. Car Lot Site) |
| Site address: | 115 2 nd Street SE, Puyallup, WA |
| Facility/Site ID: | 21357393 |
| Cleanup Site ID: | 5682 |
| VCP Project No.: | SW0398 |

Dear Jeff Kaspar:

The Washington State Department of Ecology (Ecology) received your request on March 26, 2024, for an opinion regarding the sufficiency of your independent cleanup of the Cornforth Campbell Motors Inc. Main facility (Site) under the Voluntary Cleanup Program (VCP).¹ The complete opinion request, including acceptance of data into Ecology's Environmental Information Management (EIM) database, was completed on April 29, 2024. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#) RCW.²

¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site. **As the property may be re-developed in the future, and the adjacent dry cleaner cleanup is ongoing, Ecology recommends that a contaminated media management plan (CMMP) be developed to manage any potentially contaminated soils encountered during any property re-development.**

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter [173-340](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340) WAC³ (collectively called “MTCA”).

Site Description

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(s):

- Gasoline-range total petroleum hydrocarbons (TPH-G) into the soil and groundwater.
- Diesel-range and oil-range total petroleum hydrocarbons (TPH-D and TPH-O; collectively, TPH-D/O) into the soil and groundwater.
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) into the soil and groundwater.
- Methyl-tertiary butyl ether (MTBE) into the groundwater.
- Lead into the groundwater.

Enclosure A includes Site description and diagrams. A detailed Site history was already provided in Ecology’s August 29, 2006 opinion letter and by Farallon in multiple Site cleanup reports.

The main facility Site (SW0398) property is comprised of parcels 7060000020 and 7060000030, both owned by the City of Puyallup. The Cornforth dry cleaner facility (CSID 1194; VCP SW0397) was located on parcel 0420273133 and has historically impacted the main facility property. A cleanup of the dry cleaner facility is ongoing. Between the two facilities is the right-of-way of 3rd St SE. All parcels are currently zoned as commercial. This opinion does not apply to any contamination associated with the CSID 1194 facility.

³ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

The Property is also located within the projected boundaries of the Tacoma Smelter Plume facility (facility Site identification number [FSID] #62855481). At this time, we have no information that this Property is affected. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume facility.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in **Enclosure B**. You can request these documents by filing a [records request](#).⁴ For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check if the documents are available on the [CSID 5682 cleanup site search page](#).⁵

This opinion is void if information in any of the listed 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. Ecology bases its conclusion on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. Enclosure A describes the Site, provides a brief Site history, and provides relevant Site figures.

Per Ecology's August 29, 2006 opinion letter, the (petroleum) Site was adequately delineated and characterized to meet WAC 173-340-350(7). The current opinion addresses the release associated with the former gasoline UST, which has now been shown to be successfully remediated. A model remedy was not requested because it does not apply to this Site based on the historical comingling of the dry cleaner solvent release.

⁴ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁵ <https://apps.ecology.wa.gov/cleanupsearch/site/5682>

Based on the urban location of the Site, and less than 1.5 acres of undeveloped land within 500 feet of the Site, the Site is excluded from further TEE. As the remaining contamination in soil is less than the MTCA Method A cleanup levels except for the benzene at one location, the vapor/air pathway is likely incomplete. The depth of the benzene in soil remaining is also unlikely to produce soil vapor that would be a risk for vapor intrusion into the vacant building on the Property.

Site data were entered into Ecology's Environmental Information Management (EIM) system, and were accepted on April 29, 2024. The VCP site manager reviewed the submitted data and approved those data entered on May 6, 2024.

Setting cleanup standards

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

Points of compliance applicable to the Site:

| 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) Met, based on statistical evaluation. |
| Soil- Protection of Groundwater | Based on the protection of groundwater, the standard point of compliance is throughout the Site. WAC 173-340-747 Met, based on statistical evaluation. |
| 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) Met based on compliance monitoring results. |
| 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) Incomplete – based on residual contaminant concentrations in soil and groundwater at less than cleanup levels. |

Cleanup levels applicable to the Site:

| Hazardous Substance | Soil Cleanup Level⁶ (mg/kg)⁷ | Groundwater Cleanup Level (µg/L)⁸ |
|----------------------------|---|---|
| TPH as gasoline | 30 | 800 |
| DRO and HRO | 2,000 | 500 |
| Benzene | 0.03 | 5 |
| Toluene | 7 | 1,000 |
| Ethylbenzene | 6 | 700 |
| Total Xylenes | 9 | 1,000 |
| MTBE | 0.1 | 20 |
| Lead | 250 | 15 |

Diesel and heavy oil concentrations in soil and groundwater are believed to be gasoline eluting in those ranges. The former gasoline UST was known to only contain gasoline. However, the diesel and heavy oil cleanup levels are included above. All concentrations identified in the diesel and heavy oil analytical results for soil and groundwater are in compliance with the MTCA Method A cleanup levels.

State and federal applicable laws were considered as part of the cleanup and did not require adjusting points of compliance and cleanup levels above.

Selecting the cleanup action

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

The selected cleanup action was excavation with off-Site disposal (at a permitted facility). After the excavation, further remediation was completed for the petroleum release using air and ozone sparging and soil vapor extraction.

In Ecology's January 30, 2023 opinion letter, to evaluate the release from the former gasoline UST, Ecology reiterated the 2006 opinion request to advance at least five soil borings and

⁶ More stringent of protection of groundwater or direct contact

⁷ mg/kg = milligrams per kilogram

⁸ µg/L = micrograms per Liter

collect confirmatory soil samples at locations where petroleum contaminant concentrations historically exceeded the MTCA Method A cleanup levels.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site.

In January 2003, approximately 1,100 tons of petroleum contaminated soil was excavated and disposed of at a permitted facility, TPS Technologies, Inc., in Tacoma, Washington. Further remediation was completed after 2003 using air/ozone sparging and soil vapor extraction. At the time, confirmatory soil samples at the excavation extent showed that some petroleum contamination might remain in place.

As discussed in Ecology's August 29, 2006 opinion, four consecutive quarters of compliant groundwater results for petroleum contaminants had been achieved at the Site. Ecology reiterated this result in the January 30, 2023 opinion letter. The focus of cleanup shifted between 2006 and 2023 to the adjacent dry cleaner release. The dry cleaner release still appears to impact portions of the Property and that cleanup is ongoing.

Confirmatory Soil Sampling

In January 2024, five soil borings (FB-01 through FB-05) were drilled at the Site in the general locations identified in Ecology's August 29, 2006 opinion letter, and re-iterated in the January 30, 2023 opinion letter. Confirmatory soil samples were collected at the depths of the historical exceedances, and then vertically delineated with additional soil sampling.

All contaminant concentrations in soil sampled were less than the MTCA cleanup levels at the Site, except for benzene in soil sampled at FB-04 at 10 feet below ground surface (bgs). Confirmatory soil sampling completed in January 2024 showed that Site hazardous substances concentrations complied with the MTCA cleanup levels, using the statistical comparison approach. Ecology concurs. Additionally, all contaminant concentrations in soil are less than any direct contact cleanup level.

Concentrations of petroleum contaminants in soil and groundwater related to the former gasoline UST are in compliance with Site cleanup standards.

The cleanup performed at the Site meets the threshold requirements under WAC 173-340-360(2), and:

- Is protective of human health and the environment.
- Is in compliance with cleanup standards.
- Is in compliance with applicable state and federal laws.
- Used permanent solutions to the maximum extent practicable.
- Provides for a reasonable restoration timeframe.
- Sufficiently considers public concerns.
- Does not require institutional controls or compliance monitoring.

You must decommission [resource protection wells](#) installed as part of the remedial action that are not needed to conduct post-cleanup monitoring or for any other purpose at the Site. Wells must be decommissioned in accordance with WAC [173-160-460](#).⁹ However, Ecology acknowledges that the monitoring wells at the Site are being used for the dry cleaner release cleanup, under VCP SW0397, the Cornforth Dry Cleaners. **Any well decommissioning should be completed only once that cleanup is completed, or ahead of any property re-development.**

As the property may be re-developed in the future, and the dry cleaner cleanup is ongoing, Ecology recommends that a contaminated media management plan (CMMP) be developed to manage any contaminated soils encountered during property re-development.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from the Contaminated Sites List. The Site will be added to the No Further Action sites list. Ecology will also remove this Site from the leaking underground storage tank (LUST) list.

Limitations of the Opinion

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.

⁹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

- 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 [70A.305.040](#)(4).¹⁰

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 if the action you performed is substantially equivalent. Courts make that determination. See RCW [70A.305.080](#)¹¹ and WAC [173-340-545](#).¹²

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 [70A.305.170](#)(6).¹³

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. VCP SW0398.

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me at 360-999-9589 or tim.mullin@ecy.wa.gov.

Sincerely,



Tim Mullin, LHG
Southwest Region Office, Toxics Cleanup Program

TCM: AT

¹⁰ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

¹¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

¹² <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

¹³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

Enclosures (2):

- A – Site Description, History, and Diagrams
- B – Basis for the Opinion: List of Documents

cc:

Kathy Johnson; kathy@cornforthcampbell.com
Kurt Johnson; kurt@cornforthcampbell.com
Greg Peters, Farallon Consulting; gpeters@farallonconsulting.com
Rachael Brown, City of Puyallup; rbrown@puyallupwa.gov
Ken Davies, City of Puyallup; kendavies@Puyallupwa.gov
Tom Mergy, PBS; tom.mergy@pbsusa.com
UST Coordinator, TPCHD; ust@tpchd.org
Fiscal, VCP Fiscal Analyst (w/o encl)
TCP, Operating Budget Analyst (w/o encl)

This page intentionally left blank

Enclosure A

Site Description, History, and Diagrams

Site Description

Property History and Current Use: The main facility Site is comprised of parcels 7060000020 and 7060000030, both owned by the City of Puyallup, totaling 1.202 acres. The property was historically used as a car dealership. It is now leased as a parking lot for commuter train passengers. The building on the Property is vacant. Both parcels are currently zoned as commercial.

Property Vicinity: The Site is located in a mostly commercial district, with some residential areas located about 600 feet to the northeast and southeast.

Soils and Geology: The Site is located within the Puyallup River Valley. Local topography is flat. The Site is located at approximately 50 feet above mean sea level. Subsurface soils consist of interbedded sands, silts, and gravelly sands, with varying amounts of gravel and fines. Organic material has also been reported in some boring logs. Local lithology has been interpreted as fluvial deposits overlying glacial drift deposits. The maximum depth explored at the Site is 36 feet below ground surface (bgs).

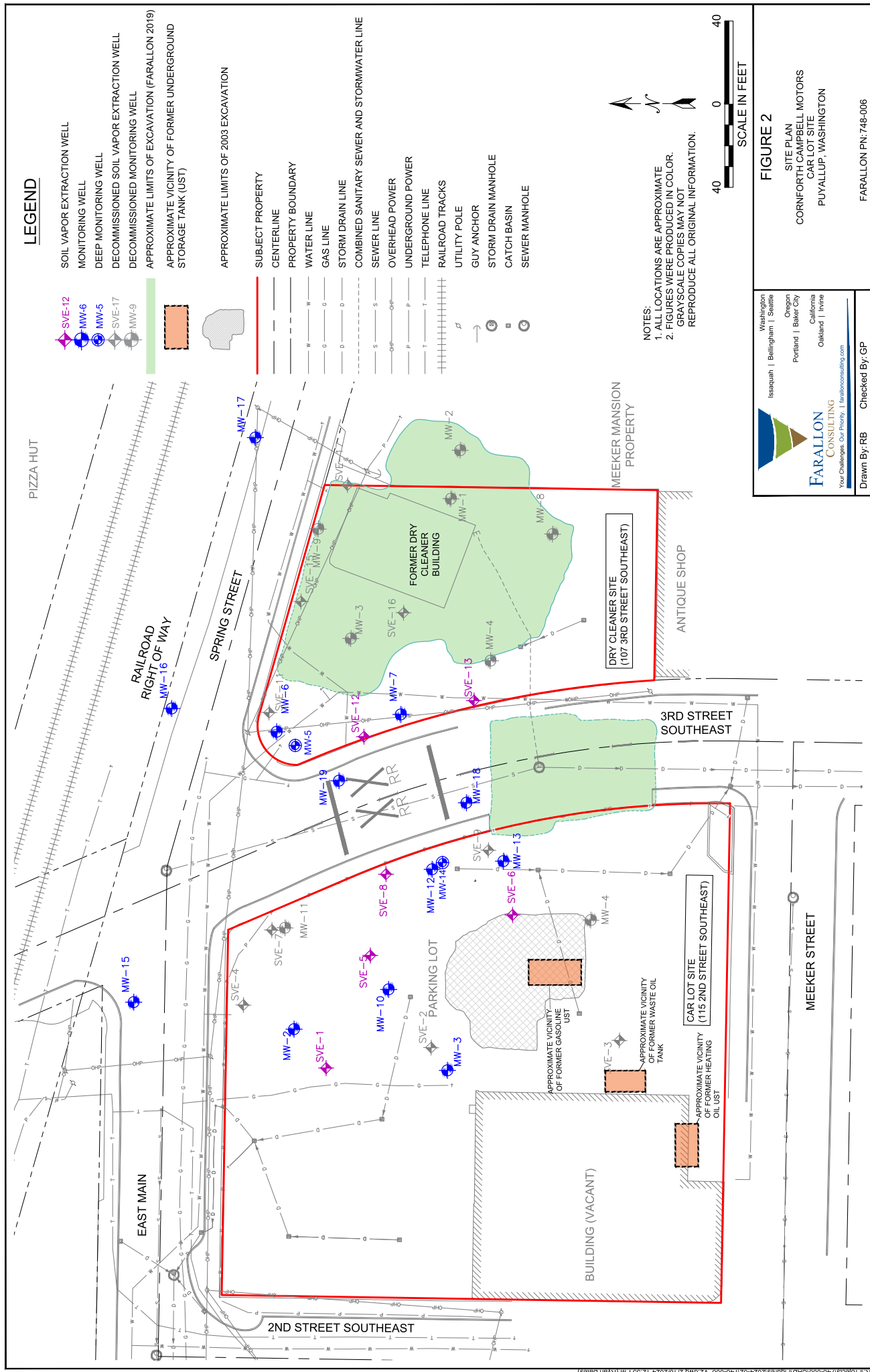
Groundwater: Based on sampling the monitoring well network from 2001-2005, depth to groundwater fluctuates from approximately 5 to 13 feet below top of casing. Groundwater flow direction has been calculated as primarily to the north-northeast and northeast.

Surface/Storm Water/Septic Systems: The Site is serviced by city water and sewer. Stormwater systems are present for all three parcels and connect to service in 3rd St SE.

There is no naturally occurring surface water at the Site. The nearest natural surface water is the Puyallup River, located approximately 0.35 miles northeast of the Site.

Site Diagrams

| | |
|--------------------------|---|
| Figure 3 (Farallon)..... | Historical Performance and Confirmation Soil Analytical Results |
| Figure 3 (Farallon)..... | Car Lot Site Plan Showing Excavation Soil Sample Locations |
| Figure 2 (Farallon)..... | Site Plan |



LEGEND

FB-05
EX-011003-8
MW-12
MW-4
SVE-6

CONFIRMATION SOIL BORING (2024)
FORMER PCS EXCAVATION SOIL SAMPLE 2003
MONITORING WELL
DECOMMISSIONED MONITORING WELL
SOIL VAPOR EXTRACTION WELL
APPROXIMATE VICINITY OF FORMER UNDERGROUND STORAGE TANK (UST)
APPROXIMATE LIMITS OF 2003 PCS EXCAVATION

STORM DRAIN LINE
CATCH BASIN

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

SOIL SAMPLE DEPTH IN FEET BELOW GROUND SURFACE.
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
BOLD = STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION (MTCAL) CLEANUP LEVEL
GRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS GASOLINE-RANGE ORGANICS
PCS = PETROLEUM CONTAMINATED SOIL
UST = UNDERGROUND STORAGE TANK
B = BENZENE
T = TOLUENE
E = ETHYLBENZENE
X = XYLENES

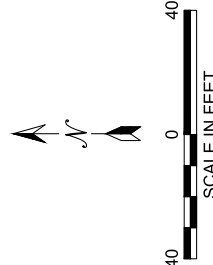
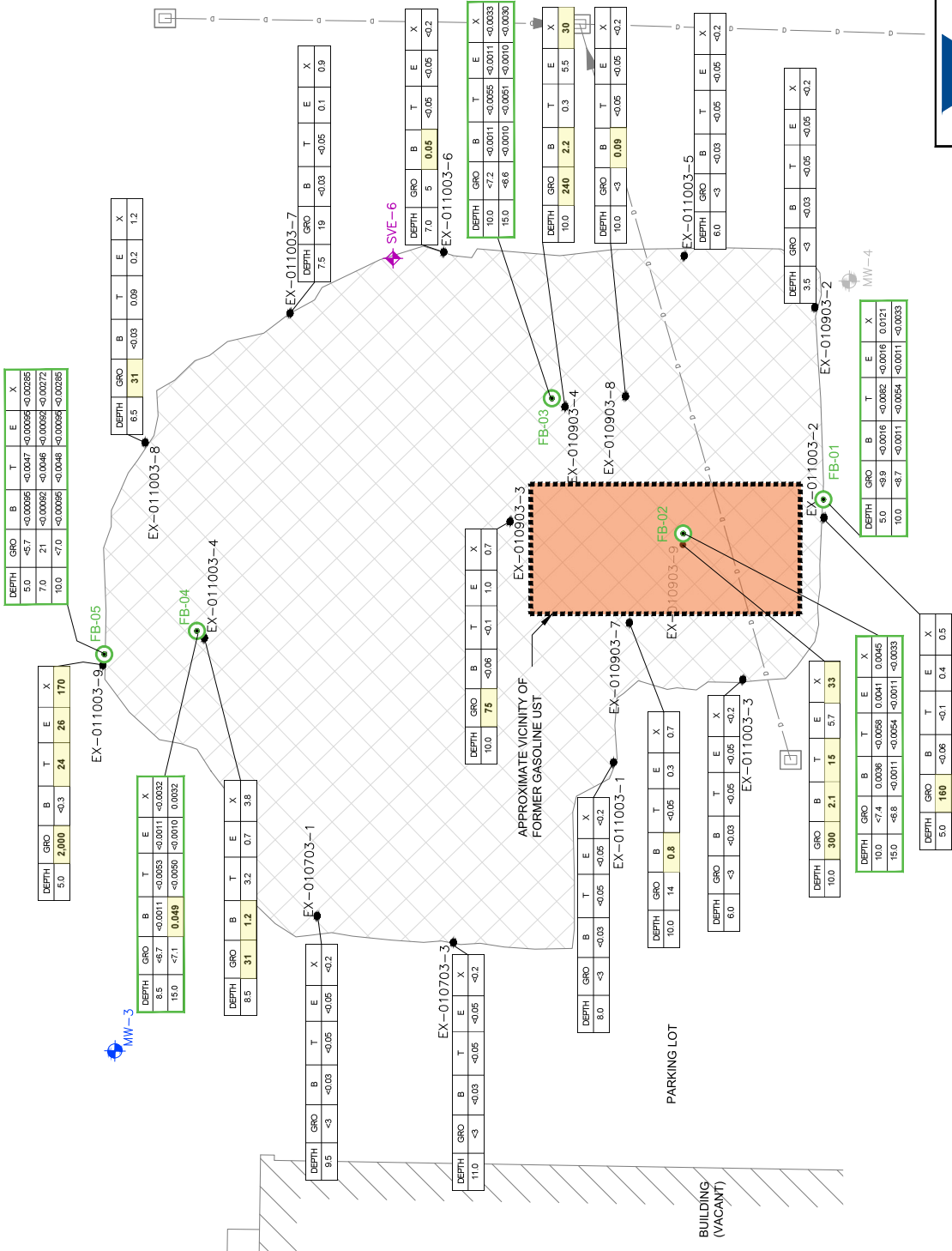


FIGURE 3

HISTORICAL PERFORMANCE AND CONFIRMATION
SOIL ANALYTICAL RESULTS
FORMER GASOLINE UST SYSTEM AREA
CORNFORTH CAMPBELL MOTORS
CAR LOT SITE
PUYALLUP, WASHINGTON
FARALLON PN: 748-006



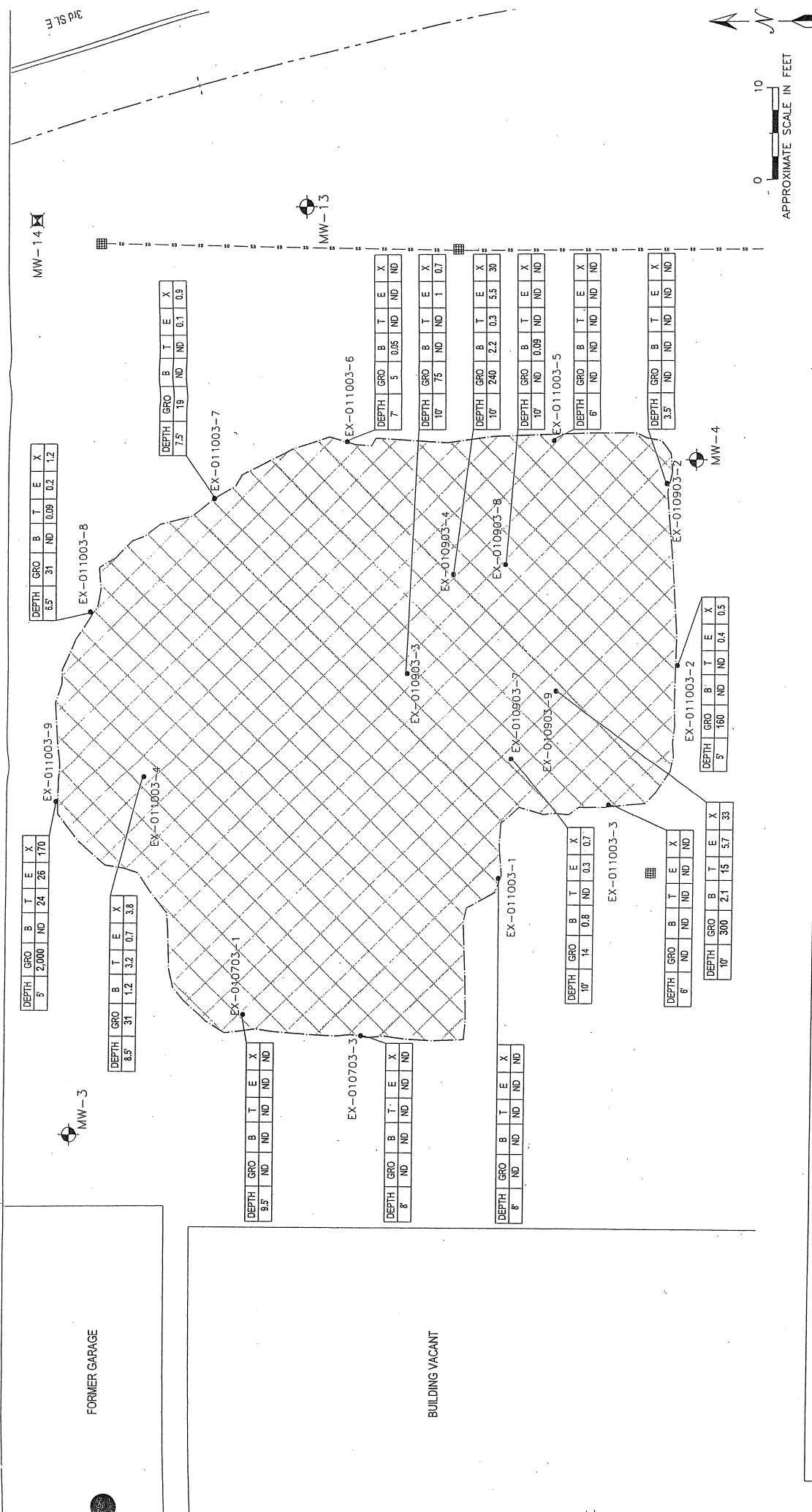


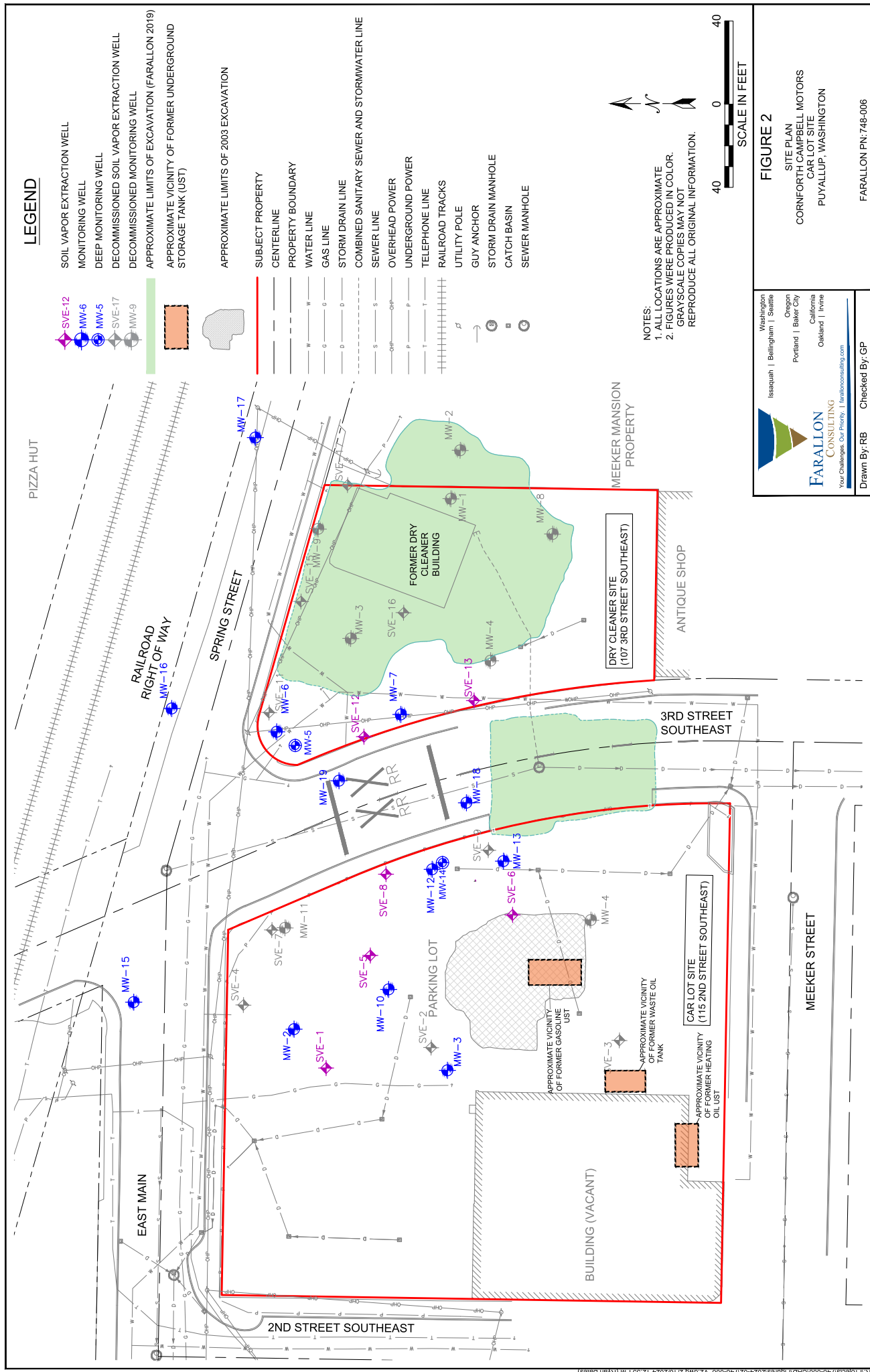
FIGURE 3

CAR LOT SITE PLAN SHOWING EXCAVATION
SOIL SAMPLE LOCATIONS, AND
ANALYTICAL RESULTS
CORNFORTH-CAMPBELL MOTORS
PUYALLUP, WASHINGTON

FARALLON CONSULTING
370 3rd Avenue NE
Issaquah, WA 98027

Drawn By: DEW Checked By: CB/AM Date: 7/17/03 Disk Reference: 748001

0 10
APPROXIMATE SCALE IN FEET



FARALLON CONSULTING
Your Challenges. Our Priority. | farallonconsulting.com

Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Baker City

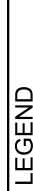
California
Oakland | Irvine

FIGURE 2

SITE PLAN
CORNFORTH CAMPBELL MOTORS
CAR LOT SITE
PUYALLUP, WASHINGTON

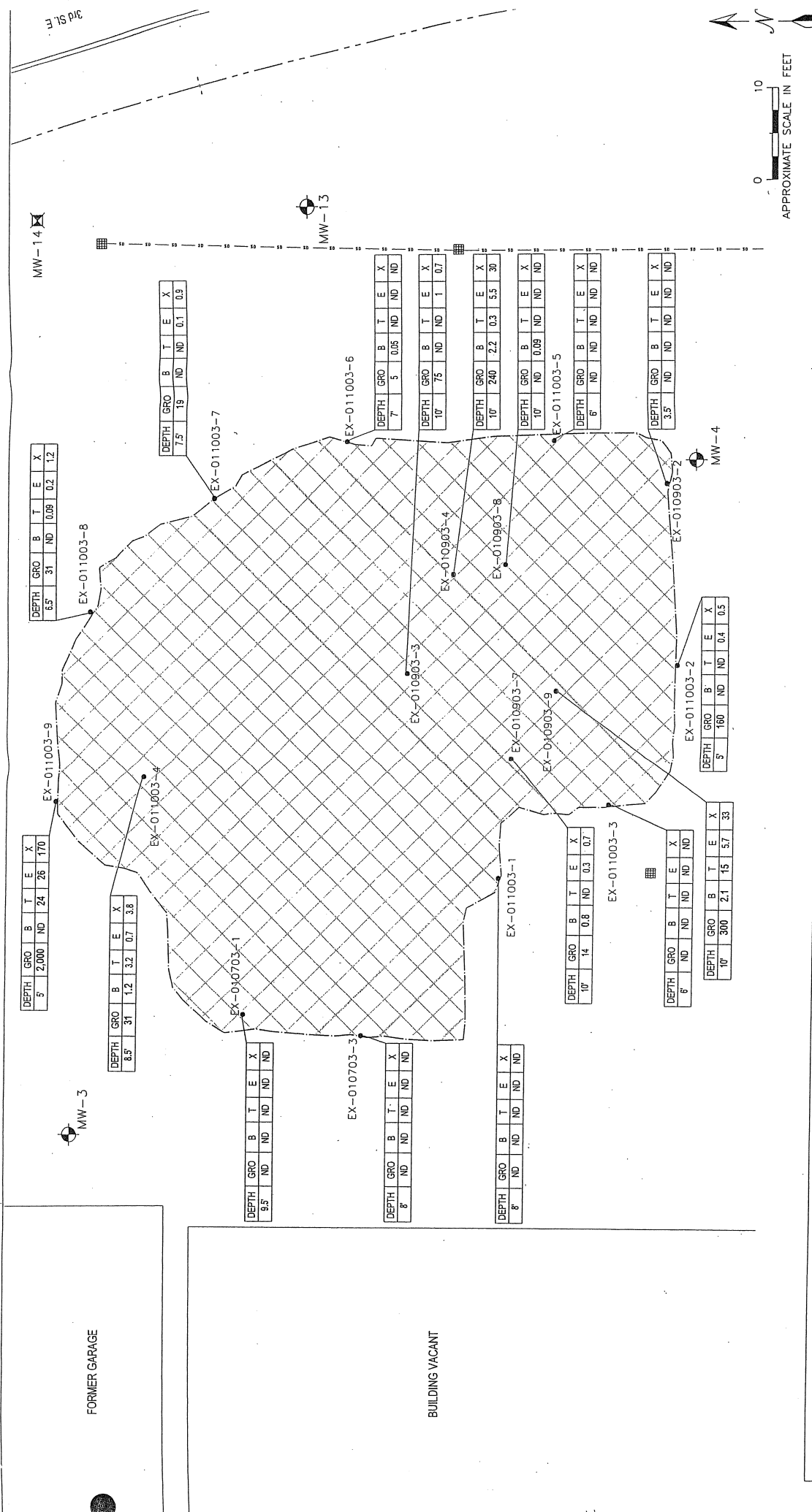
Drawn By: RB Checked By: GP

FARALLON PN: 748-006



HISTORICAL PERFORMANCE AND CONFIRMATION
SOIL ANALYTICAL RESULTS
FORMER GASOLINE UST SYSTEM AREA
CORNFORTH CAMPBELL MOTORS
CAR LOT SITE
PUYALLUP, WASHINGTON
FARALLON PN: 748-006

115 2nd STREET SOUTHEAST



This page intentionally left blank

Enclosure B

Basis for the Opinion: List of Documents

Basis for the Opinion: List of Documents

1. Farallon Consulting, Inc. (Farallon), *Confirmatory Soil Sampling Summary Report*, March 25, 2024.
2. Ecology, RE: Further Action at the following contaminated sites, January 30, 2023.
3. Farallon, *Technical Information Report*, September 13, 2018.
4. Farallon, *Hydrogeologic Report*, May 22, 2018.
5. Ecology, Re: Further Action at the following Site, August 29, 2006.
6. Farallon, *Addendum to the Dry Cleaner Site and Car Lot Site Cleanup Action Plans*, June 19, 2002.
7. Farallon, *Well Installation Report*, May 28, 2002.
8. Farallon, *Groundwater Status Report*, May 28, 2002.
9. Farallon, *Subsurface Assessment Report*, December 21, 2001.
10. ADaPT, *Phase II Environmental Site Assessment*, Former Dry Cleaning Facility, June 26, 2001.
11. ADaPT, *Phase I Environmental Site Assessment*, February 21, 2001.