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VIA EMAIL Olu.Akeroro@ecy.wa.gov

Olu Akeroro, Site Manager
WA Department of Ecology
PO Box 330316
Shoreline, WA 98133-9716

Re: Comments on draft Cleanup Action Plan ("dCAP") for Tiki Car Wash Site ("Site"); FSID No: 2352, CSID No: 5096

Dear Mr. Akeroro:

We represent Dollar Capital G2, LLC ("DG2"). DG2 owns the real property at 11839 NE 8th St. in Bellevue, WA (the "DG2 Property"). The DG2 property abuts the west boundary of the northern portion of the Site. Thank you for the opportunity to submit comments on the dCAP for the Site. In brief, DG2 is concerned that the dCAP does not adequately address soil and groundwater impacts on and emanating from the Site (Tiki Property). In particular, the dCAP fails to address potential soil and groundwater impacts that may have migrated from the Tiki Property to the DG2 Property.

Tiki Property Soil Excavation: The depth of soil excavation on the Site should not terminate at 15 feet bgs. Section 2.3.3.1 of the dCAP establishes the compliance point for soils as: *"The soil POC is the point at which soil CULs shall be attained. The soil POC is established in soils throughout the Site."* Terminating excavation at 15 bgs will not likely achieve the soil POC.

The proposed excavation area encompasses the entire Tiki property. As such, removal of soils above the MTCA method concentration until confirmation samples document concentrations below Method A is feasible and consistent with Ecology guidance on removal of source materials to the greatest extent practicable. Source removal on the Tiki property should continue until sampling confirms that the limits of the excavation meet Method A concentrations. Moreover, more comprehensive source excavation mitigates a continuing source to groundwater that could prolong groundwater clean-up.

Tiki Property Soil Excavation Adjacent to the DG2 Property: Based upon the Remedial Investigation, the limit of soil contamination above Method A adjacent to the DG2

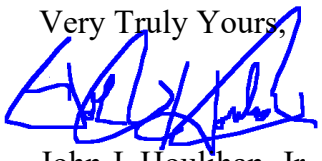
property is "inferred." The dCAP should require that soil excavation will continue laterally and at depth until confirmation sampling documents that Method A concentrations are achieved. If performance samples along the west side wall of the excavation at the DG2 Property line show contamination above Method A, then Ecology should continue the excavation onto the Dollar G2 property. DG2 is amenable to an appropriate access agreement to allow for excavation to continue onto the DG2 Property so that any migration onto the DG2 Property is fully remediated.

Groundwater Remediation: The dCAP and Remedial Investigation depict the extent of groundwater contamination adjacent to the DG2 Property. DG2 is concerned that the extent of the groundwater impacts may extend onto the southeast portion of the DG2 Property given the groundwater exceedances at GP-3 and MW-33. Consistent with our comment on the soil excavation, the dCAP should address groundwater impacts to maximum extent practicable. As such, additional groundwater treatment/injections and groundwater compliance monitoring should be extended along the north/south axis of the west property line of the Tiki property to address potential groundwater impacts on the eastern portion of the DG2 Property.

In sum, Dollar Capital G2 expects that Ecology will implement a complete remedy so that soil and groundwater concentrations on the Dollar Capital G2 property are remediated to below the MTCA Method A concentration.

If you have any questions concerning these comments, please contact me.

Very Truly Yours,



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