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March 22, 2021

Jon K. Wactor, Esq.,
Wactor & Wick, LLP
3640 Grand Avenue, Suite 200
Oakland, California 94612

Re: Cap Integrity and Groundwater Monitoring Report
Former Walker Chevrolet Property, VCP No. SW1040
633 Division Avenue
Tacoma, Washington

TRC Project Number: 430528

Dear Mr. Wactor:

TRC is pleased to submit this *Cap Integrity and Groundwater Monitoring Report* documenting the completed pavement cap inspection and groundwater monitoring at the Former Walker Chevrolet property located at 633 Division Avenue in Tacoma, Washington (the subject property) for Wactor & Wick LLP on behalf its client Retail Opportunity Investment Corp. Four Corner Square, LLC (ROIC). The subject property contains a Washington State Department of Ecology (Ecology) Site, as defined under Ecology's Model Toxics Control Act (MTCA). This Site is enrolled in Ecology's Voluntary Cleanup Program (VCP) under VCP Project Number SW1040. The Cleanup Site ID for the Site is 5318 and the Facility Site ID is 347832.

The locations of the subject property and Site are indicated on Figure 1. TRC understands that the subject property was formerly an automotive retail business with auto service bays, fuel, paint booths, and waste oil underground storage tanks (USTs). The subject property and Site have recently undergone extensive redevelopment and are currently occupied by various retail shops and restaurants including Starbucks, Jimmy Johns, Rhein Haus Tacoma, and Stadium Thriftway, a retail grocery store.

**BACKGROUND**

The Site has a conditional No Further Action (NFA) determination from Ecology that is contingent on provisions of an Environmental Covenant (EC) filed with Pierce County on December 12, 2017. The EC lists ongoing prohibitions and requirements that must be met by the current property owner, ROIC, to maintain the conditional NFA determination for the Site. As mandated by MTCA, long-term compliance monitoring is required if, as described below, containment is the selected cleanup action for the Site or portion of a Site. This Cap Integrity and Groundwater Monitoring Report has been prepared per the requirements of Washington Administrative Code (WAC) 173-340-820 and contains applicable elements of WAC 173-340-410(3), as described in Exhibit D of the EC.

The conditional NFA for the Site is based on containment of known areas of contaminated soil under a cap comprising portions of the existing building on the Site, which have been used by automotive businesses, and the asphalt- and concrete-paved surfaces on adjoining rights-of-way between the building and street curb lines near the southern portion of the building.

The 25,820-square-foot building occupies the majority of the 29,730-square-foot parcel. The building provides an impermeable cap that prevents potential contact with contaminated soil and minimizes potential stormwater infiltration and leaching of contaminants to groundwater. The pavement cap, which is exterior to the building cap, minimizes leaching of contaminants to groundwater. The extent and configuration of the building and pavement caps are illustrated on Figure 2.

This Cap Integrity and Groundwater Monitoring Report has been prepared to document the completed inspection of the caps, inspection of the monitoring well, and groundwater monitoring, that are required under the EC. The requirements are primarily described in Exhibit D of the EC, Cap Integrity and Groundwater Monitoring Plan, which is included in Attachment A.

## CAP INSPECTION

Per Ecology's requirements stated within the EC under Section 2.a. the Grantor shall maintain the integrity of the building and pavement caps. The primary purpose of the building cap is to prevent potential contact with contaminated soils and to minimize leaching of contaminants to groundwater. The primary purpose of the pavement cap is to minimize leaching of leaching of contaminants to groundwater. Per Section 2.a. of the EC, the following restrictions shall apply within the building and pavement cap areas:

The following EC restrictions apply to the building cap:

> For the building cap, the Grantor shall not alter or remove the existing structures on the property in any manner that would expose contaminated soil, result in a release to the environment of contaminants, or create a new exposure pathway, without prior written approval of Ecology. Should the Grantor propose to remove all or a portion of the existing structure designated as a cap so that access to the underlying contamination is feasible, Ecology may require treatment or removal of the underlying contaminated soil.

The following EC restrictions apply to the pavement cap:

> If the Grantor becomes aware of any activities proposed on the adjacent portions of the City of Tacoma right-of-way that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; or removal of the cap shall be reported to Ecology in writing within forty-eight (48) hours of notification. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to the cap.

TRC visited the Site on February 23, 2021 and performed a thorough on-foot inspection of the subject property to delineate the condition of the building and pavement caps and identify monuments or other permanent corner markers. Additionally, TRC photo-documented areas within the right-of-way along the west side of the pavement cap, adjacent to North First Street, and the east side of the pavement cap along Division Avenue. The photos show small landscaped areas installed as a requirement of property development by the City prior to the development of the EC that are present within the EC-defined pavement cap footprint. Figure 2 illustrates the outline of the pavement cap boundary required by the EC. Photos of the condition of the pavement cap are presented in Attachment B.

Notably, the shallowest remaining impacted soil in the area within the pavement cap footprint is documented in the *Remedial Investigation and Feasibility Study Former Walker Chevrolet Site* (Aspect Consulting, 2016) to be 15 feet or more below ground surface (bgs). That minimum depth to residual impacts in soil is below the point of compliance for direct human contact per WAC 173-340-740(5)(d) of MTCA. In addition, it appears that the remaining impacted soil remains under a paved patio area or beneath sidewalk. Due to the 15-ft. bgs or greater depth of the residual impacted soil and overlying pavement, the landscaped areas do not pose a risk of direct contact with impacted soil to workers maintaining the landscaped areas or to the public.

In addition to eliminating the direct contact exposure pathway, any residual soil contamination below the landscaped areas has not leached to groundwater. This finding is based on the empirical evidence of current groundwater sampling data, as described further in the Groundwater Monitoring section below. Therefore, the overlapping landscaped areas with the pavement cap footprint do not expose contaminated soil, result in a release to the environment of contaminants, or create a new exposure pathway.

**MONUMENT INSPECTION**

In December 2019, Pace Engineers (Pace), under EPI's[1] direction, permanently marked the exterior corners of the pavement cap to ensure that the extent of the pavement cap remained clearly delineated with monuments or other permanent corner markers as required per Section 1.f. of the EC. The interior corners of the pavement cap are defined by the exterior corners and perimeter of the building cap, which is intact and is not required to be delineated by markers. Pace surveyed and set four markers that identify the exterior corner boundaries of the property cap annotated "A" through "D" as shown on Figure 2 and in Attachment B. The pavement cap exterior corner boundary markers are described below.

- Marker "A" is set lead and tack with a brass washer with a Northing of 709832.45 and an Easting of 1156493.60.

- Marker "B" is set nail with a brass washer with a Northing of 709791.98 and an Easting of 1156573.25.

[1] Environmental Partners, Inc. (EPI) was acquired by TRC on December 27, 2019. For the purposes of this report, EPI and TRC are used synonymously.

- Marker “C” is set nail with a brass washer with 4-foot offset to ESE to EC corner with a Northing of 709739.81 and an Easting of 1156499.32.

- Marker “D” is set rebar and cap with a Northing of 709761.18 and an Easting of 1156457.26.

During the February 23, 2021 site visit TRC field staff located, inspected, and photographed the four pavement cap corner markers. The four markers identifying the exterior corners of the pavement cap area subject to conditions of the EC were noted to be in good condition and no maintenance or repairs are necessary at this time. Photographs of the EC pavement cap markers are included in Attachment B. Refer to Figure 2 and the Environmental Covenant Exhibit prepared by Pace in Attachment B for marker locations and coordinates.

## GROUNDWATER MONITORING

Monitoring well MW-11, located inside of a walk-in cooler in the Stadium Thriftway grocery store, is a required observation point in accordance with EC Section 2.c., which states that sampling MW-11 will take place at a 24-month interval to confirm the effectiveness of the building cap. Prior to the previous (October 2019) sampling event EPI prepared a Compliance Monitoring Plan (CMP) in accordance with the requirements of WAC 173-340-820 and contained the elements of WAC 173-340-410(3) to satisfy the requirements of the EC.

The first 24-month sampling event was performed by EPI on October 15, 2019, the timing of which was based on the official recording of the EC on December 12, 2017. The second 24-month groundwater monitoring event was performed by TRC on February 23, 2021. Groundwater sampling was performed following the requirements of the CMP, which is presented in Attachment C.

### Sampling Methods

Groundwater samples were collected using low-flow purging and sampling methods using a bladder pump equipped with new, single-use sample tubing and new, single-use Teflon-lined bladders. Purging and sampling were performed following “Technical Guidance on Low Flow Purging and Sampling” (Nielsen 2002) as cited in Exhibit D of the EC (Attachment A).

TRC field staff measured the depth to water and total depth of MW-11 prior to purging and sampling. The depth to groundwater at MW-11 was 51.09 feet below the top of casing (TOC) and the total depth was measured at 63.59 feet below TOC. The bladder pump intake was set at 58 feet below TOC to pump groundwater from the middle portion of the water column in the well. The pumping rate was set at less than 0.5 liters per minute (L/min) to be consistent with low flow purging and sampling techniques. An electronic water level indicator was used to periodically monitor the depth to groundwater during purging to mitigate excessive drawdown of the water level, as defined by the technical guidance.

Purge water stabilization was evaluated using a calibrated multi-parameter water meter equipped with an in-line flow-cell for monitoring field parameters (e.g. temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential) during purging. Field parameter data were recorded on pre-printed field forms, which are provided in Attachment D. The groundwater sample was collected

after field parameter measurements stabilized to within their respective stabilization criteria in three consecutive readings. Approximately 1.8 wetted casing volumes were removed prior to stabilization.

Following field parameter stabilization, groundwater samples were collected directly from the pump discharge tubing at a flow rate of approximately 100 milliliters per minute or less. Samples collected for volatile organic compounds (VOC) and gasoline-range organics (GRO) analyses were collected in new, pre-labeled, laboratory-supplied 40 milliliter (mL) VOA vials with hydrochloric acid preservative. Samples collected for diesel-range organics (DRO) and oil-range organics (ORO) analyses were collected in new, pre-labeled, laboratory-supplied 500 mL amber glass bottles.

Filled sample bottles were immediately placed in a chilled cooler at 4 degrees Celsius or lower, and delivered to the Ecology-accredited analytical laboratory Friedman and Bruya, Inc. under standard chain-of-custody protocols. Groundwater samples were submitted for laboratory analysis for the following EC-defined Constituents of Concern (COCs) under standard laboratory turnaround times:

- VOCs by U.S. Environmental Protection Agency (EPA) Method 8260C;
- GRO by Northwest Total Petroleum Hydrocarbons as Gasoline (NWTPH-Gx) Method; and
- DRO and ORO by Northwest Total Petroleum Hydrocarbons as Diesel (NWTPH-Dx) Method.

**MW-11 Analytical Results**

Analytical results for the February 23, 2021 groundwater monitoring event were compared to their respective Ecology MTCA Method A or B Cleanup Levels (CULs) as summarized in Table 1. Laboratory data sheets of the analytical results are presented in Attachment E.

- Trichloroethene (TCE) was detected at a concentration of 2.2 micrograms per liter (µg/L), which is less than the MTCA Method A CUL of 5.0 µg/L. Historical concentrations of TCE in samples from MW-11 range from 1.4 µg/L to 4.6 µg/L indicating that the current concentration of 2.2 µg/L is within the normal concentration range for MW-11 groundwater and that groundwater conditions are stable at the Site.
- Chloroform was detected at a concentration of 1.2 µg/L, which is less than the MTCA Method B CUL (carcinogenic) of 1.4 µg/L. Chloroform was not detected at the Method Detection Limit (MDL) of 1.0 µg/L during the previous, October 2019, sampling event.
- GRO, DRO, and ORO were not detected at their MDLs from the MW-11 sample; therefore, the sample did not exceed the MTCA Method A groundwater CULs for those petroleum hydrocarbon ranges.
- Benzene, toluene, ethylbenzene, and xylenes (BTEX) were not detected at their MDLs; therefore, the MW-11 sample did not exceed the MTCA Method A groundwater CULs for BTEX compounds.

The shallowest impacted soil remaining beneath the pavement cap at the Site is at 15-ft. bgs had detections of gasoline range organics, benzene, and xylene at concentrations exceeding MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses. The current groundwater sample from MW-11 confirmed that all petroleum hydrocarbon ranges and BTEX compounds were non-detect, which provides empirical evidence that residual petroleum hydrocarbon and BTEX concentrations present in soil under the pavement cap are not leaching to groundwater.

### MW-11 Inspection Results

TRC field staff inspected the condition of monitoring well MW-11 while conducting the scheduled groundwater sampling event on February 23, 2021, and noted that the well monument, watertight well cap, and lock were in good condition and did not require maintenance, repair, or replacement.

When measuring the well's total depth, TRC field staff noted a soft bottom potentially indicating accumulated solids in the sump of the PVC well casing. Upon purging MW-11, TRC observed moderately high turbidity levels, with a maximum of 89.2 nephelometric turbidity units (NTU) early in the well purging process. Turbidity readings quickly declined to less than 30 NTU and stabilized at a final measurement of 12.9 NTU. Turbidity values for the 2021 sampling event are significantly lower than those measured in 2019. This indicates that the well re-development performed in 2019 successfully reduced and maintained lower turbidity in groundwater from MW-11.

## CONCLUSIONS AND RECOMMENDATIONS

Based on the findings of the February 2021 groundwater sampling event and TRC's site inspection and documentation activities, TRC has the following conclusion and recommendations:

1. The building cap at the Subject Property is intact and unchanged since the last inspection and appears to meet the requirements described in the EC.

2. The pavement cap permanent corner boundary markers are present and are in good condition with no repairs or maintenance required.

3. Pavement appears to be absent at several small landscaped areas installed at the direction of the City prior to the development of the EC that are within the EC-defined pavement cap area. However, landscape maintenance workers and the public are protected from potential direct contract with residual contamination based on the 15-ft. bgs or greater depth to residual impacts in soil, which is covered primarily asphalt pavement, concrete sidewalk or by clean soil and landscaped vegetation. In addition, all petroleum hydrocarbon ranges and BTEX compounds were non-detect in the MW-11 groundwater sample indicating that residual petroleum hydrocarbon concentrations in soil beneath the pavement are not leaching to groundwater to a detectable degree at the Site. Thus, the landscaped areas within the pavement cap footprint do not expose contaminated soil, result in a release of contaminants to the environment, or create a new exposure pathway,

4. Analytical results for the groundwater sample from MW-11 are primarily non-detect with a detection of TCE at a concentration less than half the MTCA Method A CUL for groundwater. Chloroform was detected at a concentration less than its MTCA Method B CUL. All other EC-defined COCs were not detected at their MDLs. The February 2021 groundwater sample from well MW-11 demonstrates compliance with the MTCA CULs for the 24-month groundwater monitoring event detailed in Section 2.b. of the EC.

5. Empirical evidence (i.e., groundwater sample results for MW-11) demonstrates that groundwater beneath the Site complies with MTCA Method A and B CULs.

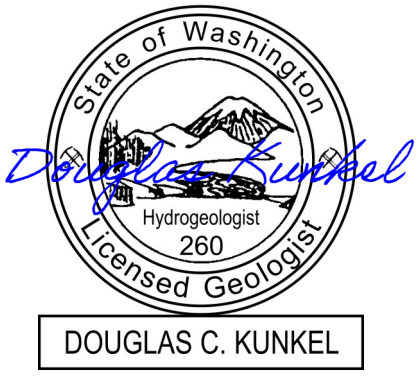
6. Groundwater monitoring at MW-11 should continue under the existing biannual sampling frequency. Inspections of the building cap, pavement cap, and pavement cap corner monuments should be performed during the biannual groundwater monitoring events.

**LIMITATIONS**

To the extent that preparation of this *Cap Integrity and Groundwater Monitoring Report* has required the application of best professional judgment and the application of scientific principles, certain results of this work have been based on subjective interpretation. TRC makes no warranties express or implied, including and without limitation, warranties as to merchantability or fitness for a particular purpose. The information provided in this report is not to be construed as legal advice.

This *Cap Integrity and Groundwater Monitoring Report* was prepared solely for Wactor & Wick, LLP and its client ROIC, and the contents herein may not be used or relied upon by any other person without the express written consent and authorization of TRC.

Sincerely,




*Prepared by:*
Douglas Kunkel, LG, LHG
Principal Hydrogeologist

*Reviewed and approved by:*
Keith Woodburne, LG
Principal Geologist

## ENCLOSURES

### Table

Table 1 Summary of Groundwater Sample Analytical Results

### Figures

Figure 1 General Vicinity Map
Figure 2 Site Representation with Environmental Covenant Cap Locations

### Attachments

Attachment A Environmental Covenant, Exhibit D
Attachment B Pavement Cap Condition and Monument Photographs
Attachment C Compliance Monitoring Plan
Attachment D Field Data Sheets
Attachment E Laboratory Data Sheets

## REFERENCES

Aspect Consulting. 2016: *Remedial Investigation and Feasibility Study, Former Walker Chevrolet Site,* 633 Division Avenue, Tacoma, Washington. Prepared for David Shaw, Successor to Walker Chevrolet. July 25, 2016

The Nielsen Environmental Field School, Inc. (Nielsen). 2002: *Technical Guidance on Low Flow Purging and Sampling.*

# Table

**Table 1**
**Summary of Groundwater Sample Analytical Results**
**Cap Integrity and Groundwater Monitoring Report**
**Wactor & Wick, LLP**
**633 Division Avenue Tacoma, Washington**

| Sample Identification | Date Collected | Petroleum Hydrocarbons | | | Volatile Organic Compounds[c] | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | GRO[a] | DRO[b] | ORO[b] | PCE | TCE | tDCE | cDCE | Vinyl Chloride | Benzene | Toluene | Ethyl-benzene | Xylenes | Chloro-form |
| MW-11 | 10/15/2019 | <100 | <50 | <250 | <1 | **2.0** | <1 | <1 | <0.2 | <0.35 | <1 | <1 | <2 | <1 |
| MW-11 | 2/23/2021 | <100 | <50 | <250 | <1 | **2.2** | <1 | <1 | <0.2 | <0.35 | <1 | <1 | <2 | **1.2** |
| **MTCA Method A or B Cleanup Levels for Groundwater[d]** | | **800/1,000[e]** | **500** | **500** | **5.0** | **5.0** | **160[f]** | **16[f]** | **0.2** | **5.0** | **1000** | **700** | **1000** | **1.4[f]** |

Notes:

All results presented in micrograms per liter (µg/L).

| | |
|---|---|
| **Bold** | Bold results indicate that the compound was detected above the laboratory method detection limit. |
| < | Less than laboratory method detection limit |
| a | Analyzed by NWTPH-Gx. |
| b | Analyzed by NWTPH-Dx. |
| c | Analyzed by EPA Method 8260C. |
| d | Model Toxics Control Act (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1, Washington Administrative Code (WAC) 173-340-900. |
| e | MTCA Method A Groundwater Cleanup Level is 800 µg/L when benzene is present in the sample and 1,000 µg/L when benzene is not detected. |
| f | MTCA Method B Groundwater Cleanup Level from Cleanup Levels and Risk Calculation (CLARC). |

Compounds:

| | |
|---|---|
| GRO | Gasoline-range organics |
| DRO | Diesel-range organics |
| ORO | Oil-range organics |
| PCE | Tetrachloroethene |
| TCE | Trichloroethene |
| tDCE | trans-1,2-Dichloroethene |
| cDCE | cis-1,2-Dichloroethene |

# Figures


**NOTES:**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425.395.0010


## FIGURE 1
GENERAL VICINITY MAP

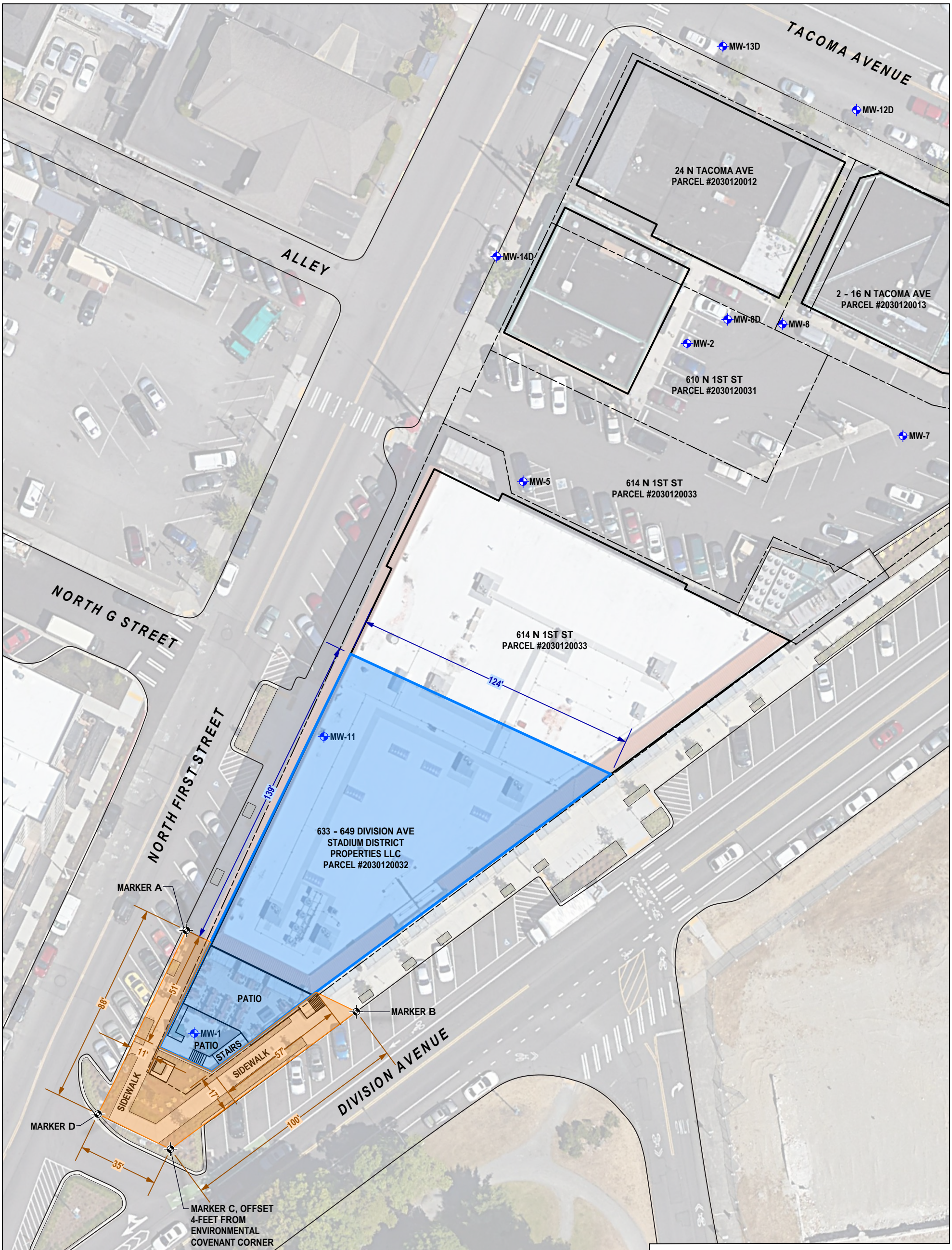
***REPORT***
CAP INTEGRITY AND GROUNDWATER MONITORING REPORT

***LOCATION***
633 DIVISION AVENUE
TACOMA, WASHINGTON

***PREPARED FOR***
WACTOR & WICK

***PROJECT NUMBER***
430528

***DATE*** ..... 3/1/21
***DRAWN BY*** ..... VPB
***REVIEWED BY*** ..... DCK




***NOTES:***

- PAVEMENT CAP
- BUILDING CAP
- PARCEL BOUNDARY (PIERCE COUNTY GIS)
- MONITORING WELL LOCATION
- ENVIRONMENTAL COVENANT MARKER LOCATION

BUILDING CAP LOCATIONS APPROXIMATED FROM EXHIBIT C (MAP ILLUSTRATING LOCATION OF RESTRICTIONS) BY ASPECT CONSULTING JULY 2017

AERIAL PHOTO: GOOGLE EARTH, MAY 2018

PARCEL BOUNDARIES APPROXIMATED FROM PIERCE COUNTY, WASHINGTON GIS MAPS

ALL SITE FEATURES ARE APPROXIMATED FROM FIGURES FROM ASPECT CONSULTING, PIERCE COUNTY GIS, AND GOOGLE EARTH AERIAL PHOTOGRAPHY

N

0 10 20 40

*HORIZONTAL SCALE: 1" = 40'*

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# FIGURE 2

SITE REPRESENTATION WITH ENVIRONMENTAL COVENANT CAP LOCATIONS

***REPORT***
CAP INTEGRITY AND GROUNDWATER MONITORING REPORT

***LOCATION***
633 DIVISION AVENUE
TACOMA, WASHINGTON

***PREPARED FOR***
WACTOR & WICK

***PROJECT NUMBER***
430528

***DATE*** ..... 3/1/21
***DRAWN BY*** ..... VPB
***REVIEWED BY*** ..... DCK

# Attachment A
# Environmental Covenant, Exhibit D

## Exhibit D

### CAP INTEGRITY AND GROUNDWATER MONITORING PLAN

The Grantor shall maintain the building cap in accordance with Section 2.a, and shall not modify or remove the existing structure over the area designated as a cap, as illustrated in Exhibit C, without written authorization from Ecology. There are no inspection requirements for the building cap on the Property. The presence and condition of the pavement cap in the right-of-way will be observed during five-year periodic reviews.

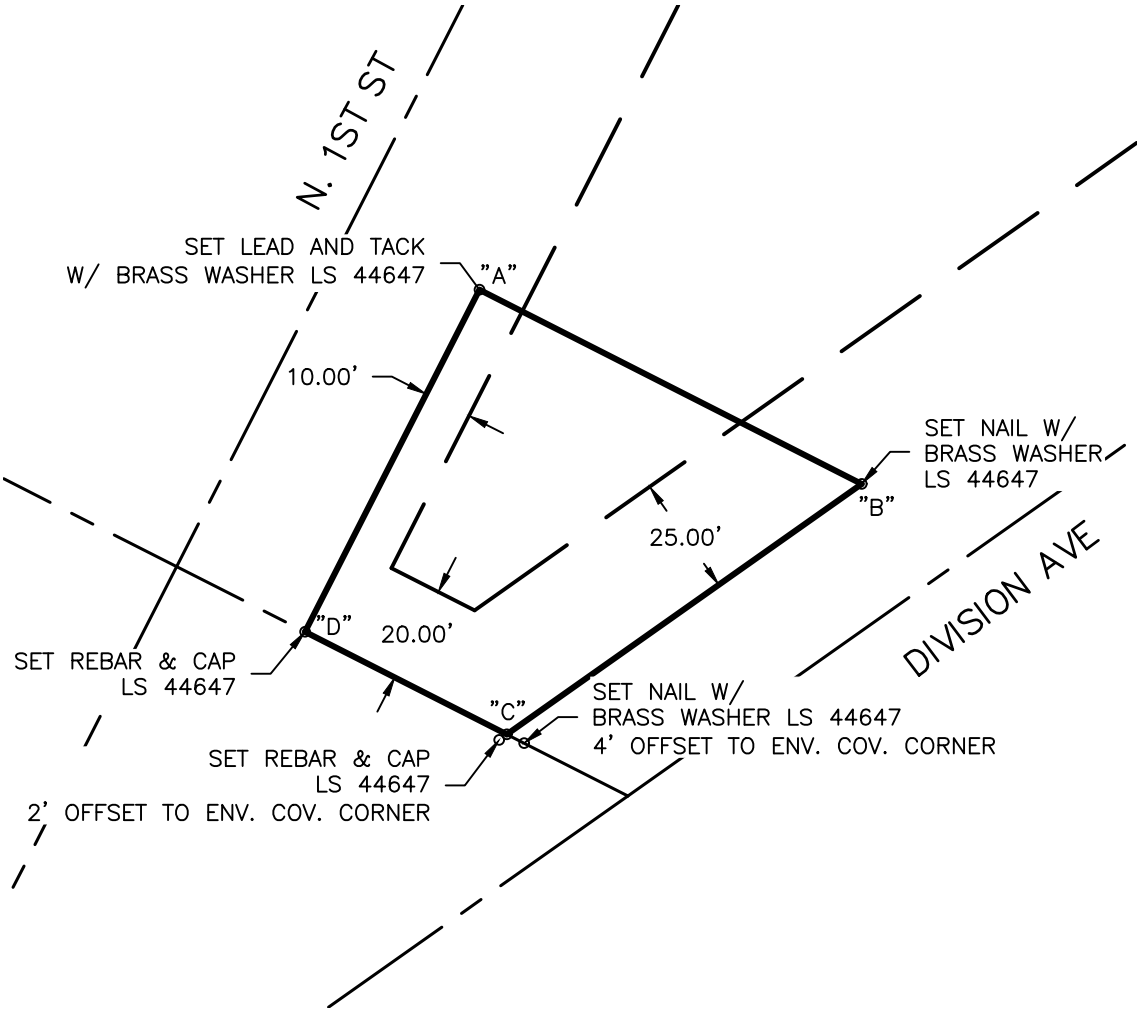
The Grantor shall maintain MW-11 as an observation point in accordance with Section 2.c. MW-11 shall be sampled at a 24-month interval following receipt of Ecology's no further action (NFA) opinion letter to confirm the effectiveness of the building cap. As mandated by the Model Toxic Control Act, long-term compliance monitoring is required if containment is the selected cleanup action for a site or a portion of a site. The compliance monitoring plan must be prepared as per the requirements of WAC 173-340-820 and must contain the elements of WAC 173-340-410(3). The plan must require submittal of groundwater samples for the analysis of volatile organic compounds by EPA Method 8260 and total petroleum hydrocarbons by Methods NWTPH-Gx and NWTPH-Dx, or equivalent. Sample results shall be submitted to the Department of Ecology through the Environmental Information Management (EIM) database. A groundwater monitoring report must be submitted to Ecology after each sampling event.

Groundwater samples will be collected following "Technical Guidance on Low Flow Purging and Sampling" (Nielson, 2002). Groundwater will be pumped from the middle portion of the water column in the well at a rate of less than 1.0 L/min. A water level indicator will be used to monitor the elevation of groundwater during pumping of the well to mitigate drops in the water level during pumping and sampling. A calibrated multi-parameter water meter will be used with a flow cell for monitoring groundwater (temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential) during the pumping and sampling process (Appendix A).

The Department of Ecology will perform a five-year periodic review of the Site in accordance with Section 173-340-420, Washington Administrative Code of the Model Toxics Control Act.

# Attachment B
# Pavement Cap Condition and Monument Photographs

# ENVIRONMENTAL COV. EXHIBIT




"A" NORTHING 709832.45
EASTING 1156493.60

"B" NORTHING 709791.98
EASTING 1156573.25

"C" NORTHING 709739.81
EASTING 1156499.32

"D" NORTHING 709761.18
EASTING 1156457.26

PACE
An Engineering Services Company

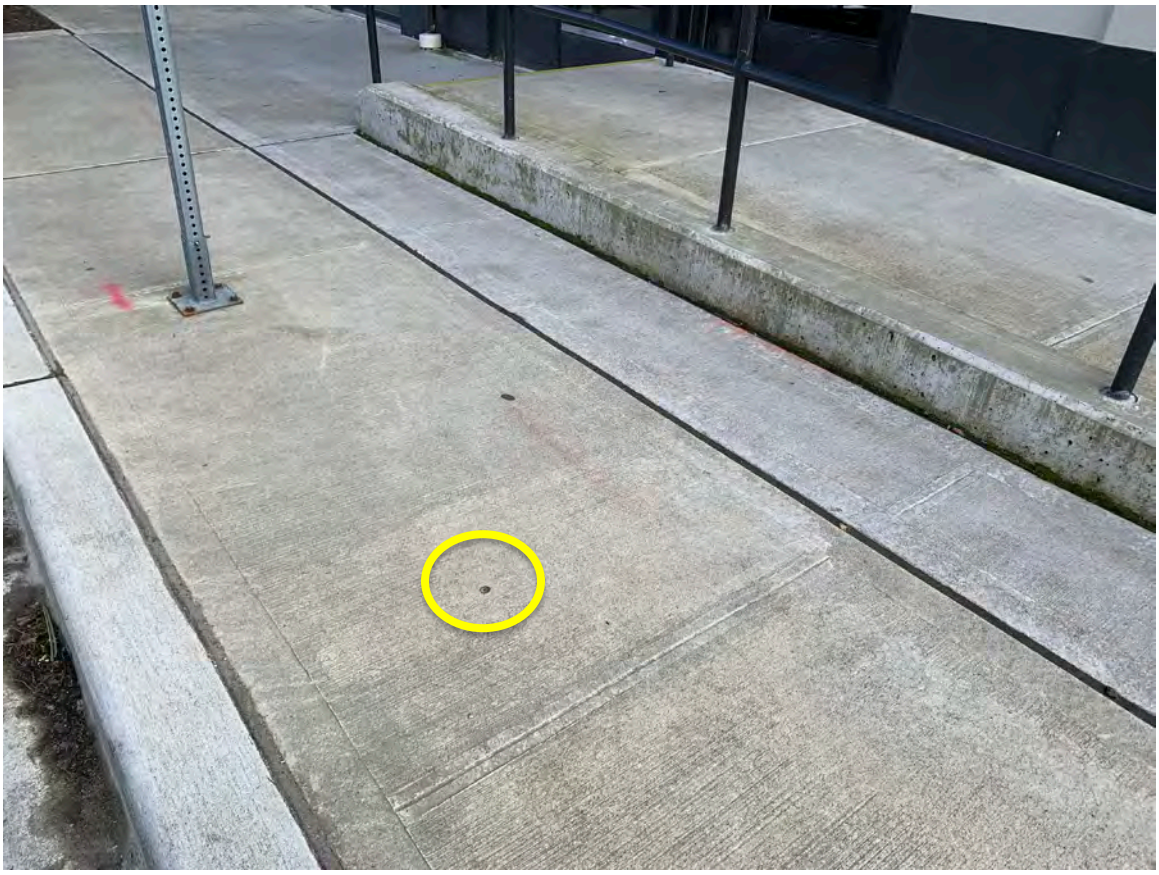
11255 Kirkland Way, Suite 300
Kirkland, WA 98033
*p.* 425.827.2014 | *f.* 425.827.5043

Civil | Structural | Planning | Survey
paceengrs.com

N

1"=40'

SCALE: 1"=40' FILE: V19564-BNDRY DATE: 12/19/19 JFS PROJ. NO.: 19564



Photograph 1: Pavement Cap Marker “A”. View is toward the northeast.

Photograph 2: Pavement Cap Marker “A”

Photograph 3: Pavement Cap Marker “B”.  View is toward the north.

Photograph 4: Pavement Cap Marker “B”

Photograph 5: Pavement Cap Marker “C”.  Offset from the corner by 4-feet due to utility vault.

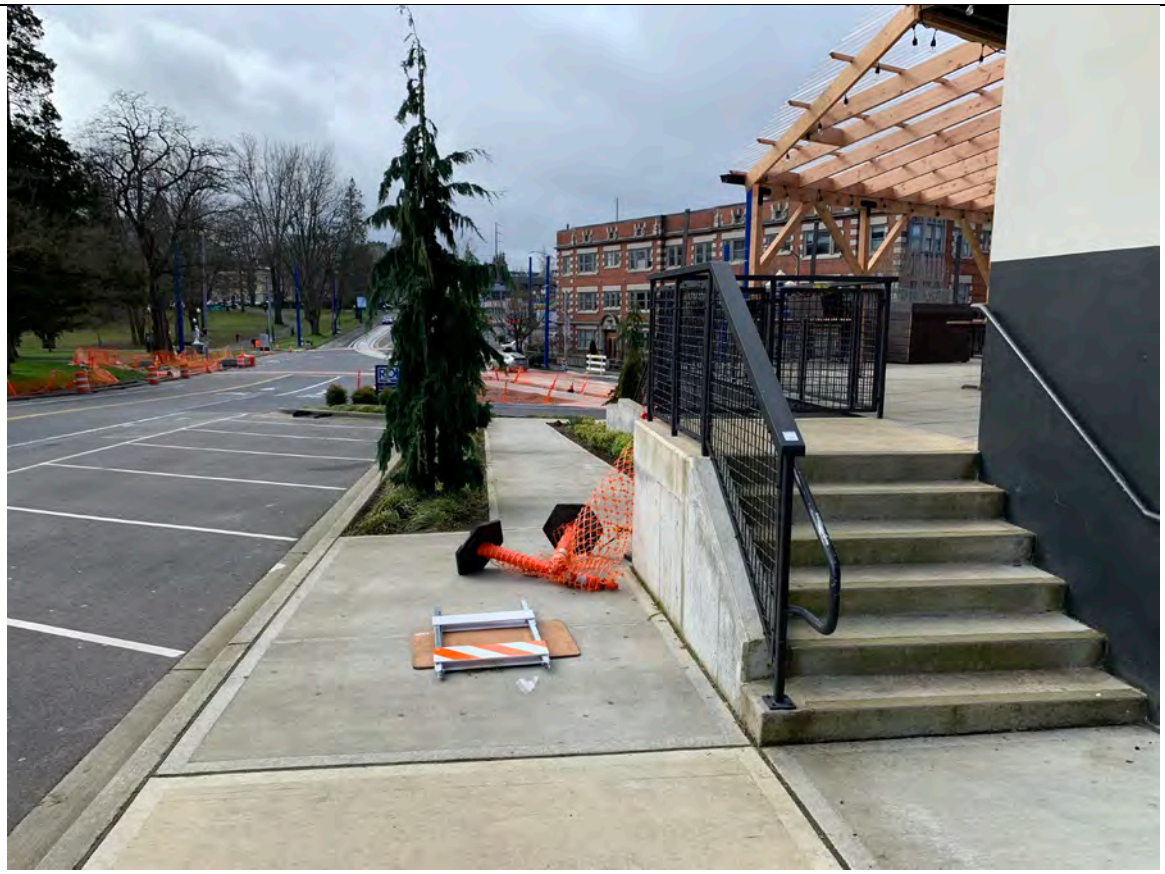

Photograph 6: Pavement Cap Marker “C”

Photograph 7: Pavement Cap Marker “D”.  View is toward east.

Photograph 8: Pavement Cap Marker “D”


Photograph 9: View looking NE along Division Ave.


Photograph 10: View looking N along 1st St.



Photograph 11: View looking SW along Division Ave.


Photograph 12: View looking N along 1st St.

# Attachment C
# Compliance Monitoring Plan

ENVIRONMENTAL PARTNERS INC

1180 NW Maple Street, Suite 310 Issaquah, Washington 98027 ph 425.395.0010

# COMPLIANCE MONITORING PLAN

**DATE:** October 9, 2019

**TO:** Wactor & Wick LLP

**CC:** Ms. Anna Nguyen, Esq., Wactor & Wick LLP

**FROM:** Mr. Sean Trimble, L.G.

**RE:** Compliance Monitoring Plan
Former Walker Chevrolet Property
633 Division Avenue
Tacoma, Washington

EPI Project Number: 48006.0

## INTRODUCTION

Environmental Partners, Inc. (EPI) is pleased to submit this *Compliance Monitoring Plan* (CMP) documenting the planned inspection, groundwater monitoring, and reporting tasks at the Former Walker Chevrolet property located at 633 Division Avenue in Tacoma, Washington (the subject property). The subject property contains a Washington State Department of Ecology (Ecology) defined Site that is enrolled in Ecology's Voluntary Cleanup Program (VCP) under VCP Project Number SW1040. The Cleanup Site ID for the Site is 5318 and the Facility Site ID is 347832.

The location of the subject property and Site is indicated on Figure 1. EPI understands that the subject property was formerly an automotive retail business with auto service bays, fuel and waste oil underground storage tanks (USTs), and paint booths. The subject property and Site have undergone extensive redevelopment is currently occupied by various retail shops and restaurants including Starbucks, Jimmy Johns, Rhein Haus Tacoma, and Stadium Thriftway, a retail grocery store.

The Site has a conditional No Further Action (NFA) determination from Ecology that is contingent on provisions of an Environmental Covenant (EC) filed with Pierce County on December 12, 2017. The EC lists ongoing prohibitions and requirements that must be met by the current property owner, ROIC Tuo LLC (ROIC), to maintain the conditional NFA determination. As mandated by Ecology's Model Toxics Control Act (MTCA), long-term compliance monitoring is required if, as described below, containment is the selected cleanup action for the Site or portion of a Site. This CMP has been prepared per the requirements of Washington Administrative Code (WAC) 173-340-820 and contains elements of WAC 173-340-410(3), as described in Exhibit D of the EC. All work performed by EPI under this CMP will be confidential and will be performed under Wactor & Wick LLP oversight. Nothing will be submitted to any agency without Wactor & Wick LLP's advance approval.

The conditional NFA for the Site is based on containing known areas of contaminated soil under a cap comprising portions of the existing building on the Site, which have been used by automotive businesses, and the asphalt- and concrete-paved surfaces on adjoining rights-of-way between the building and street curb lines near the southern portion of the building. The 25,820-square-foot building occupies the majority of the 29,730-square-foot parcel. The building provides an impermeable cap that prevents potential contact with contaminated soil and minimizes leaching of contaminants to groundwater. The pavement cap minimizes leaching of contaminants to groundwater. The extents of the building and pavement caps are illustrated on Figure 2.

This CMP documents the planned work to implement the required inspection of the caps, groundwater monitoring, and reporting components of the EC, which are primarily described in Exhibit D of the EC, Cap Integrity and Groundwater Monitoring Plan (Attachment A).

## SCOPE OF WORK

The scope of work for this CMP is described below:

- Inspect the Site to evaluate compliance with conditions of the EC, including a good faith effort to locate and preserve any reference monuments and boundary markers used to define the areal extent of coverage of the EC;
- Inspect and document the condition of the building and pavement caps;
- Perform groundwater monitoring at existing well MW-11 per the planning documents; and
- Prepare and submit a Client review draft groundwater monitoring and cap, monument, and boundary marker inspection report to Wactor & Wick LLP for review and revision. Send final report to Ecology with Wactor & Wick LLP approval.

### Inspection of the Site

EPI personnel will inspect the Site for reference monuments and boundary markers used to delineate the areal extent of the cap as shown on Figure 2. In addition, personnel will inspect and evaluate if access to remedial action components described in the EC (e.g., monitoring wells, reference monuments, and boundary markers) is unencumbered.

### Inspection and Document Condition of the Caps

In accordance with the EC, EPI will verify that the building cap and building structures have not been altered or removed in any manner that would expose contaminated soil, result in a release of contaminants to the environment, or create a new exposure pathway. Any damage to the cap that would compromise the integrity of the cap (e.g., drilling; digging; piercing the cap with a post, stake or similar device; grading; excavation; installation of underground utilities; or removal of the cap) will be reported to Wactor & Wick LLP.

**Groundwater Monitoring**

This task includes collecting a groundwater sample from monitoring well MW-11 to confirm the continued effectiveness of the building cap. The groundwater sample will be collected using low-flow purging and sampling methods and single-use sample tubing using a bladder pump following "Technical Guidance on Low Flow Purging and Sampling" (Nielsen 2002) as cited in Exhibit D of the EC (Attachment A). Groundwater will be pumped from the middle portion of the water column in the well at a rate of less than 1.0 liter per minute (L/min). A water level indicator will be used to monitor the depth to groundwater during pumping of the well to mitigate excessive decreases in the water level, as defined by the technical guidance, during purging and sampling.

Purge water stabilization will be evaluated using a calibrated multi-parameter water meter equipped with an in-line flow cell for monitoring field parameters (e.g., temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential) during the pumping and sampling process. All such data will be recorded on field forms. Sampling procedures will be adjusted to take all reasonable measures to prevent the potential loss of volatiles during sample collection. The groundwater sample will be collected after these measurements have stabilized to within 10 percent in consecutive readings or three wetted casing volumes have been removed, whichever occurs first.

Samples will be collected directly from the discharge tubing and will occur at a flow rate of approximately 100 milliliters per minute or less. Samples collected for volatile organic compound (VOC) and gasoline-range organics (GRO) analyses will be retained in new, pre-labeled, laboratory-supplied 40 milliliter VOA vials with hydrochloric acid preservative. Samples collected for diesel-range organics (DRO) and oil-range organics (ORO) analyses will be retained in new, pre-labeled, laboratory-supplied 500 milliliter (mL) amber glass bottles, or equivalent.

Samples will be immediately placed in a chilled cooler at 4 degrees Celsius or lower, pending delivery to an accredited analytical laboratory. All samples will be handled and transported under standard chain-of-custody protocols. Groundwater samples will be submitted for fixed base laboratory analysis of the following analytes under standard laboratory turnaround time:

- VOCs by U.S. Environmental Protection Agency (EPA) Method 8260C;
- GRO by Northwest Total Petroleum Hydrocarbons as Gasoline (NWTPH-Gx) Method; and
- DRO and ORO by Northwest Total Petroleum Hydrocarbons as Diesel (NWTPH-Dx) Method.

**Groundwater Monitoring Report**

Following completion of the inspection and groundwater monitoring at the subject property and receipt of laboratory data, EPI will prepare a *Groundwater Monitoring Report* (GMR) documenting sampling results from the MW-11 monitoring event, including depth to water, stabilized field parameter measurements, and laboratory data.

The GMR will also include documentation of inspection results and evaluations for access to remedial action components described in the EC, including monitoring wells, reference monuments, and boundary markers for delineation of the area of the Site that is subject to the EC. Results for inspection and evaluation of the condition of the building and pavement caps will also be documented in the GMR as described in the EC.

### Schedule

As noted in Exhibit D of the EC, groundwater sampling at MW-11 will be performed at 24-month intervals. The initial groundwater sampling and cap inspection event will be scheduled and performed within 2 weeks of Wactor & Wick LLP's approval of this CMP. Laboratory analyses for the MW-11 groundwater sample will be performed under standard turnaround time, which is commonly 2 weeks for most analyses.

The Client review draft GMR will be submitted to Wactor & Wick LLP for review and comment within 2 weeks of receipt of all laboratory data. EPI will incorporate Wactor & Wick LLP's revisions and comments into a final GMR within 1 week of receiving Client comments and revisions. The final GMR will be submitted to Ecology, with Wactor & Wick LLP approval, as required under the terms of the EC. In addition, with advanced approval from Wactor & Wick LLP, EPI will upload analytical and field parameter data to Ecology's Environmental Information Management (EIM) database, as required under the EC.

## ENCLOSURES

**Figures**

Figure 1 General Vicinity Map
Figure 2 Site Representation with Environmental Covenant Cap Locations

**Attachment A**

Exhibit D from the Stadium Retail LLC Environmental Covenant, electronically recorded in Pierce County, Washington, December 12, 2017

# Figures


**NOTES:**

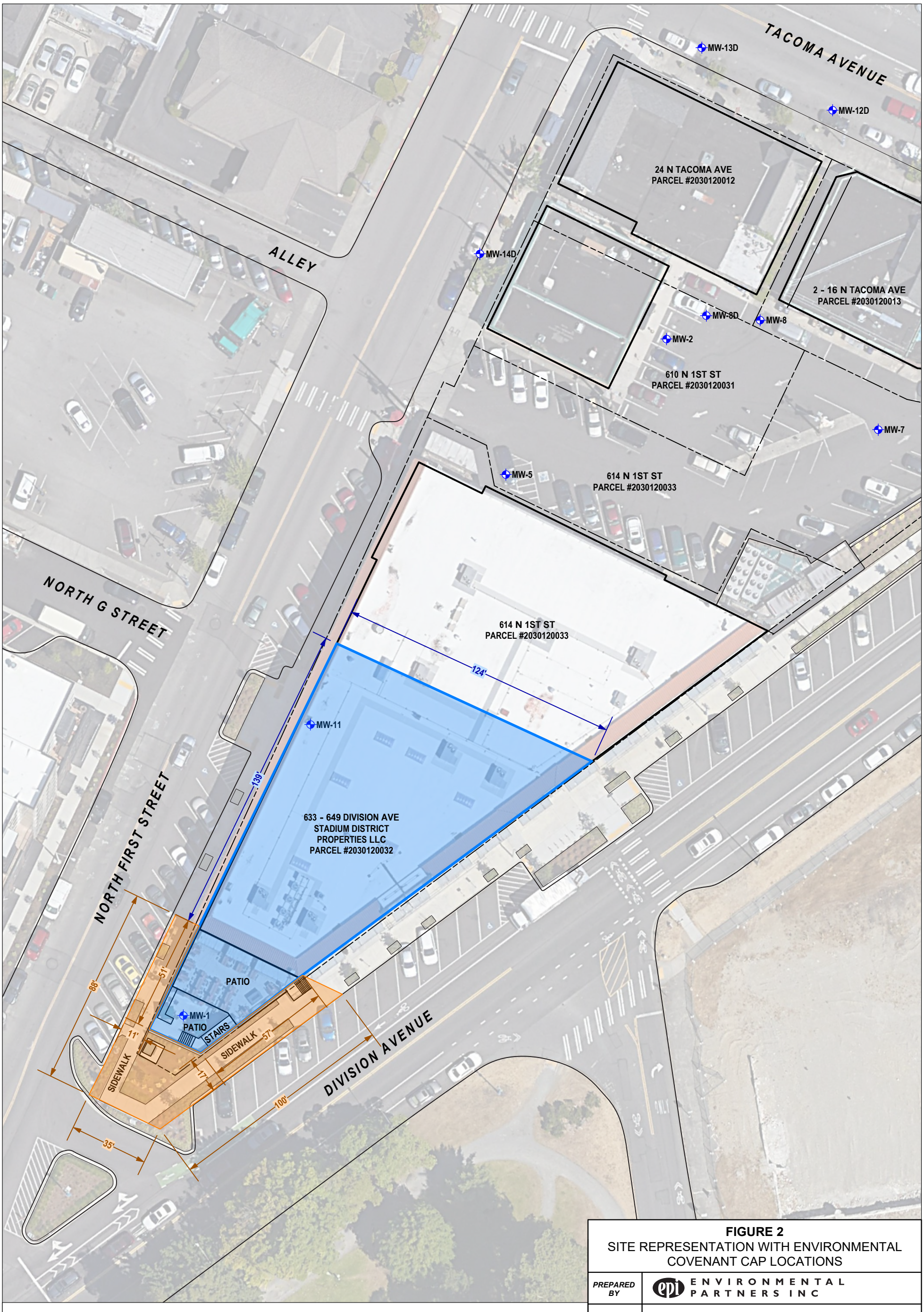
N

SOURCE: USGS 7.5 MINUTE QUADRANGLE (TOPOGRAPHIC)
TACOMA NORTH, WA
TACOMA SOUTH, WA
POVERTY BAY, WA
2017
*SCALE = 1:25,000*

## FIGURE 1

GENERAL VICINITY MAP

| | | | |
|---|---|---|---|
| ***PREPARED BY*** | ENVIRONMENTAL PARTNERS INC | | |
| ***REPORT*** | COMPLIANCE MONITORING PLAN | | |
| ***LOCATION*** | 633 DIVISION AVENUE<br>TACOMA, WASHINGTON | | |
| ***PREPARED FOR*** | WACTOR & WICK LLP | | |
| ***DATE***<br>10/1/19 | ***DRAWN BY***<br>VPB | ***REVIEWED BY***<br>DCK | ***PROJECT NUMBER***<br>48006.0 |




**NOTES:**

- PAVEMENT CAP
- BUILDING CAP
- PARCEL BOUNDARY (PIERCE COUNTY GIS)
- MONITORING WELL LOCATION

BUILDING CAP LOCATIONS APPROXIMATED FROM EXHIBIT C (MAP ILLUSTRATING LOCATION OF RESTRICTIONS) BY ASPECT CONSULTING JULY 2017

AERIAL PHOTO: GOOGLE EARTH, MAY 2018

PARCEL BOUNDARIES APPROXIMATED FROM PIERCE COUNTY, WASHINGTON GIS MAPS

ALL SITE FEATURES ARE APPROXIMATED FROM FIGURES FROM ASPECT CONSULTING, PIERCE COUNTY GIS, AND GOOGLE EARTH AERIAL PHOTOGRAPHY

N

0 10 20 40

*HORIZONTAL SCALE: 1" = 40'*

# FIGURE 2
## SITE REPRESENTATION WITH ENVIRONMENTAL COVENANT CAP LOCATIONS

| | | | |
|---|---|---|---|
| ***PREPARED BY*** | ENVIRONMENTAL PARTNERS INC | | |
| ***REPORT*** | COMPLIANCE MONITORING PLAN | | |
| ***LOCATION*** | 633 DIVISION AVENUE<br>TACOMA, WASHINGTON | | |
| ***PREPARED FOR*** | WACTOR & WICK LLP | | |
| ***DATE***<br>10/1/19 | ***DRAWN BY***<br>VPB | ***REVIEWED BY***<br>DCK | ***PROJECT NUMBER***<br>48006.0 |

# Attachment A
# Exhibit D from the Stadium Retail LLC Environmental Covenant, electronically recorded in Pierce County, Washington, December 12, 2017

## Exhibit D

### CAP INTEGRITY AND GROUNDWATER MONITORING PLAN

The Grantor shall maintain the building cap in accordance with Section 2.a, and shall not modify or remove the existing structure over the area designated as a cap, as illustrated in Exhibit C, without written authorization from Ecology. There are no inspection requirements for the building cap on the Property. The presence and condition of the pavement cap in the right-of-way will be observed during five-year periodic reviews.

The Grantor shall maintain MW-11 as an observation point in accordance with Section 2.c. MW-11 shall be sampled at a 24-month interval following receipt of Ecology's no further action (NFA) opinion letter to confirm the effectiveness of the building cap. As mandated by the Model Toxic Control Act, long-term compliance monitoring is required if containment is the selected cleanup action for a site or a portion of a site. The compliance monitoring plan must be prepared as per the requirements of WAC 173-340-820 and must contain the elements of WAC 173-340-410(3). The plan must require submittal of groundwater samples for the analysis of volatile organic compounds by EPA Method 8260 and total petroleum hydrocarbons by Methods NWTPH-Gx and NWTPH-Dx, or equivalent. Sample results shall be submitted to the Department of Ecology through the Environmental Information Management (EIM) database. A groundwater monitoring report must be submitted to Ecology after each sampling event.

Groundwater samples will be collected following "Technical Guidance on Low Flow Purging and Sampling" (Nielson, 2002). Groundwater will be pumped from the middle portion of the water column in the well at a rate of less than 1.0 L/min. A water level indicator will be used to monitor the elevation of groundwater during pumping of the well to mitigate drops in the water level during pumping and sampling. A calibrated multi-parameter water meter will be used with a flow cell for monitoring groundwater (temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential) during the pumping and sampling process (Appendix A).

The Department of Ecology will perform a five-year periodic review of the Site in accordance with Section 173-340-420, Washington Administrative Code of the Model Toxics Control Act.

# Attachment D
# Field Data Sheets

# TRC Groundwater Sampling Field Data

1 of 2

| | | | |
|---|---|---|---|
| **Project Name:** | 633 DIVISION AVE | | |
| **Project Number:** | 430528 | | |
| Well ID: | MW-11 | Date | 2021-02-23 |
| Sample ID: | MW-11 | Field Team: (Initials) | ES/RO |
| Field Conditions | 1in - walk in COOLER | | |

## Purge Information

| | |
|---|---|
| Well Diameter (in.) | 2 |
| Well Depth (ft.) | 63.59 |
| Initial Depth to Water (ft.) | 51.09 |
| Depth of Water Column | 12.09 |
| 1 Casing Volumes | 2 gal |
| 3 Casing Volume | 6 gal |
| (2"=0.163 x depth) | |
| (4"=0.653 x depth) | |

Intake: 58

Purge Method : Submersible pump / (Bladder Pump) / Peristaltic Pump / Other: : _____

| | |
|---|---|
| Start Time | 0940 |
| End Time | 1052 |
| Total Gallons Purged | 3.5 |
| Final Depth to Water (ft.) | 51.09 |

| Time | Volume Gallons | pH | Conductivity mS/cm | DO mg/L | Temp. °C | ORP mV | Turbidity NTU | Depth to Water ft. | Appearance/Notes |
|---|---|---|---|---|---|---|---|---|---|
| 0944 | | 6.19 | 283.7 | 5.28 | 12.5 | 279.1 | 54.1 | 51.09 | cloudy |
| 0947 | | 6.20 | 291.3 | 4.42 | 13.1 | 263.0 | 89.2 | 51.09 | |
| 0950 | | 6.26 | 296.1 | 4.59 | 13.2 | 258.8 | 42.6 | 51.09 | |
| 0953 | | 6.26 | 298.5 | 3.58 | 13.2 | 257.1 | 31.3 | 51.09 | clear |
| 0956 | | 6.25 | 298.9 | 3.58 | 13.1 | 257.5 | 24.5 | 51.09 | |
| 0959 | | 6.21 | 302.3 | 3.54 | 13.1 | 258.7 | 29.1 | 51.09 | |
| 1002 | | 6.21 | 302.7 | 3.51 | 13.0 | 258.7 | 23.9 | 51.09 | |
| 1005 | | 6.21 | 303.0 | 3.46 | 13.0 | 258.6 | 22.9 | 51.09 | |
| 1008 | | 6.22 | 303.0 | 3.55 | 12.9 | 258.6 | 25.5 | 51.09 | |
| 1011 | | 6.19 | 300.4 | 3.56 | 12.5 | 260.8 | 19.8 | 51.09 | |
| 1018 | | 6.09 | 288.8 | 3.43 | 11.6 | 268.9 | 19.0 | 51.09 | BATTERY CHANGE |
| 1021 | | 6.06 | 290.5 | 3.42 | 11.3 | 268.5 | 16.9 | 51.09 | |
| 1024 | | 6.10 | 300.8 | 3.39 | 12.9 | 261.5 | 16.5 | 51.09 | |
| 1027 | | 6.29 | 303.9 | 4.01 | 13.1 | 255.2 | 13.7 | 51.09 | |
| Stabilization Criteria | | ± 0.1 | ± 3% | ± 10% if > 0.5 | ± 3% | ± 20 mV | ± 10% if > 5 NTU | -- | cont'd |

## Sample Information

Sample Method(s) : Peristaltic pump / Submersible pump / (Bladder Pump) / Bailer / Other

| Analysis | Time | Bottle Type | Preservative/Filtration | Comments |
|---|---|---|---|---|
| DRO | 1038 | 500 mL | AMB | |
| GRO | 1038 | 40 mL | HCl | |
| VOC | 1038 | 40 mL | HCl | |
| | | | | |
| | | | | |

End Time: 1045

**Comments / Exceptions:**

Presence of floating product? YES / (NO) Presence of sinking product? YES / (NO)

Intake 2 59 ft

~ 60 ft SKIP- BOND TUBE

TD 63.59 - SOFT BOTTOM

Notes: Where multiple visits are required to complete sampling, parameters are to be checked prior to sampling for each visit. Enter data under field comments.

# TRC Groundwater Sampling Field Data

| | | | |
|---|---|---|---|
| **Project Name:** | | | |
| **Project Number:** | | | |
| Well ID: | | Date | |
| Sample ID: | | Field Team: (Initials) | |
| Field Conditions | | | |

## Purge Information

| | |
|---|---|
| Well Diameter (in.) | |
| Well Depth (ft.) | |
| Initial Depth to Water (ft.) | |
| Depth of Water Column | |
| 1 Casing Volumes | |
| 3 Casing Volume | |
| (2"=0.163 x depth) | |
| (4"=0.653 x depth) | |

Purge Method : Submersible pump / Bladder Pump / Peristaltic Pump / Other: : _____

| | |
|---|---|
| Start Time | |
| End Time | |
| Total Gallons Purged | |
| Final Depth to Water (ft.) | |

| Time | Volume Gallons | pH | Conductivity mS/cm | DO mg/L | Temp. °C | ORP mV | Turbidity NTU | Depth to Water ft. | Appearance/Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1030 | | 6.29 | 304.5 | 3.99 | 13.1 | 256.1 | 13.1 | 51.09 | |
| 1033 | | 6.26 | 305.9 | 3.96 | 13.1 | 258.0 | 12.9 | 51.09 | |
| 1038 | | | | | | | | | SAMPLE |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| Stabilization Criteria | | ± 0.1 | ± 3% | ± 10% if > 0.5 | ± 3% | ± 20 mV | ± 10% if > 5 NTU | -- | -- |

## Sample Information

Sample Method(s) : Peristaltic pump / Submersible pump / Bladder Pump / Bailer / Other

| Analysis | Time | Bottle Type | Preservative/Filtration | Comments |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

End Time

**Comments / Exceptions:**

Presence of floating product? YES / NO Presence of sinking product? YES / NO

Notes: Where multiple visits are required to complete sampling, parameters are to be checked prior to sampling for each visit. Enter data under field comments.

# Attachment E
# Laboratory Data Sheets

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Yelena Aravkina, M.S.
Michael Erdahl, B.S.
Arina Podnozova, B.S.
Eric Young, B.S.

3012 16th Avenue West
Seattle, WA 98119-2029
(206) 285-8282
fbi@isomedia.com
www.friedmanandbruya.com

March 4, 2021

Doug Kunkel, Project Manager
TRC Environmental
1180 NW Maple St, Suite 310
Issaquah, WA 98027

RE: 430528-Wactor Tacoma, F&BI 102366

Dear Mr Kunkel:

Included are the results from the testing of material submitted on February 24, 2021 from the 430528-Wactor Tacoma, F&BI 102366 project. There are 10 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days, or as directed by the Chain of Custody document. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
c: Cynthia Moon
TRC0304R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

CASE NARRATIVE

This case narrative encompasses samples received on February 24, 2020 by Friedman & Bruya, Inc. from the TRC Environmental 430528-Wactor Tacoma, F&BI 102366 project. Samples were logged in under the laboratory ID's listed below.

| Laboratory ID | TRC Environmental |
|---|---|
| 102366 -01 | MW-11 |

All quality control requirements were acceptable.

Date of Report: 03/04/21
Date Received: 02/24/21
Project: 430528-Wactor Tacoma, F&BI 102366
Date Extracted: 03/01/21
Date Analyzed: 03/02/21

**RESULTS FROM THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS GASOLINE USING METHOD NWTPH-Gx**

Results Reported as ug/L (ppb)

| Sample ID<br>Laboratory ID | Gasoline Range | Surrogate<br>(% Recovery)<br>(Limit 51-134) |
|---|---|---|
| MW-11<br>102366-01 | <100 | 91 |
| Method Blank<br>01-352 MB | <100 | 92 |

Date of Report: 03/04/21
Date Received: 02/24/21
Project: 430528-Wactor Tacoma, F&BI 102366
Date Extracted: 02/24/21
Date Analyzed: 02/24/21

**RESULTS FROM THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL AND MOTOR OIL USING METHOD NWTPH-Dx**

Results Reported as ug/L (ppb)

| Sample ID<br>Laboratory ID | Diesel Range<br>($C_{10}$-$C_{25}$) | Motor Oil Range<br>($C_{25}$-$C_{36}$) | Surrogate<br>(% Recovery)<br>(Limit 41-152) |
|---|---|---|---|
| MW-11<br>102366-01 | <50 | <250 | 93 |
| Method Blank<br>01-487 MB2 | <50 | <250 | 98 |

## Analysis For Volatile Compounds By EPA Method 8260D

| | | | |
|---|---|---|---|
| Client Sample ID: | MW-11 | Client: | TRC Environmental |
| Date Received: | 02/24/21 | Project: | 430528-Wactor Tacoma, F&BI 102366 |
| Date Extracted: | 02/24/21 | Lab ID: | 102366-01 |
| Date Analyzed: | 02/24/21 | Data File: | 022425.D |
| Matrix: | Water | Instrument: | GCMS4 |
| Units: | ug/L (ppb) | Operator: | JCM |

| Surrogates: | % Recovery: | Lower Limit: | Upper Limit: |
|---|---|---|---|
| 1,2-Dichloroethane-d4 | 103 | 86 | 113 |
| Toluene-d8 | 100 | 88 | 114 |
| 4-Bromofluorobenzene | 97 | 88 | 112 |

| Compounds: | Concentration ug/L (ppb) | Compounds: | Concentration ug/L (ppb) |
|---|---|---|---|
| Dichlorodifluoromethane | <1 | 1,3-Dichloropropane | <1 |
| Chloromethane | <10 | Tetrachloroethene | <1 |
| Vinyl chloride | <0.2 | Dibromochloromethane | <1 |
| Bromomethane | <5 | 1,2-Dibromoethane (EDB) | <1 |
| Chloroethane | <1 | Chlorobenzene | <1 |
| Trichlorofluoromethane | <1 | Ethylbenzene | <1 |
| Acetone | <50 | 1,1,1,2-Tetrachloroethane | <1 |
| 1,1-Dichloroethene | <1 | m,p-Xylene | <2 |
| Hexane | <5 | o-Xylene | <1 |
| Methylene chloride | <5 | Styrene | <1 |
| Methyl t-butyl ether (MTBE) | <1 | Isopropylbenzene | <1 |
| trans-1,2-Dichloroethene | <1 | Bromoform | <5 |
| 1,1-Dichloroethane | <1 | n-Propylbenzene | <1 |
| 2,2-Dichloropropane | <1 | Bromobenzene | <1 |
| cis-1,2-Dichloroethene | <1 | 1,3,5-Trimethylbenzene | <1 |
| Chloroform | 1.2 | 1,1,2,2-Tetrachloroethane | <1 |
| 2-Butanone (MEK) | <20 | 1,2,3-Trichloropropane | <1 |
| 1,2-Dichloroethane (EDC) | <1 | 2-Chlorotoluene | <1 |
| 1,1,1-Trichloroethane | <1 | 4-Chlorotoluene | <1 |
| 1,1-Dichloropropene | <1 | tert-Butylbenzene | <1 |
| Carbon tetrachloride | <1 | 1,2,4-Trimethylbenzene | <1 |
| Benzene | <0.35 | sec-Butylbenzene | <1 |
| Trichloroethene | 2.2 | p-Isopropyltoluene | <1 |
| 1,2-Dichloropropane | <1 | 1,3-Dichlorobenzene | <1 |
| Bromodichloromethane | <1 | 1,4-Dichlorobenzene | <1 |
| Dibromomethane | <1 | 1,2-Dichlorobenzene | <1 |
| 4-Methyl-2-pentanone | <10 | 1,2-Dibromo-3-chloropropane | <10 |
| cis-1,3-Dichloropropene | <1 | 1,2,4-Trichlorobenzene | <1 |
| Toluene | <1 | Hexachlorobutadiene | <1 |
| trans-1,3-Dichloropropene | <1 | Naphthalene | <1 |
| 1,1,2-Trichloroethane | <1 | 1,2,3-Trichlorobenzene | <1 |
| 2-Hexanone | <10 | | |

## Analysis For Volatile Compounds By EPA Method 8260D

| | | | |
|---|---|---|---|
| Client Sample ID: | Method Blank | Client: | TRC Environmental |
| Date Received: | Not Applicable | Project: | 430528-Wactor Tacoma, F&BI 102366 |
| Date Extracted: | 02/24/21 | Lab ID: | 01-432 mb |
| Date Analyzed: | 02/24/21 | Data File: | 022408.D |
| Matrix: | Water | Instrument: | GCMS4 |
| Units: | ug/L (ppb) | Operator: | JCM |

| Surrogates: | % Recovery: | Lower Limit: | Upper Limit: |
|---|---|---|---|
| 1,2-Dichloroethane-d4 | 96 | 86 | 113 |
| Toluene-d8 | 98 | 88 | 114 |
| 4-Bromofluorobenzene | 94 | 88 | 112 |

| Compounds: | Concentration ug/L (ppb) | Compounds: | Concentration ug/L (ppb) |
|---|---|---|---|
| Dichlorodifluoromethane | <1 | 1,3-Dichloropropane | <1 |
| Chloromethane | <10 | Tetrachloroethene | <1 |
| Vinyl chloride | <0.2 | Dibromochloromethane | <1 |
| Bromomethane | <5 | 1,2-Dibromoethane (EDB) | <1 |
| Chloroethane | <1 | Chlorobenzene | <1 |
| Trichlorofluoromethane | <1 | Ethylbenzene | <1 |
| Acetone | <50 | 1,1,1,2-Tetrachloroethane | <1 |
| 1,1-Dichloroethene | <1 | m,p-Xylene | <2 |
| Hexane | <5 | o-Xylene | <1 |
| Methylene chloride | <5 | Styrene | <1 |
| Methyl t-butyl ether (MTBE) | <1 | Isopropylbenzene | <1 |
| trans-1,2-Dichloroethene | <1 | Bromoform | <5 |
| 1,1-Dichloroethane | <1 | n-Propylbenzene | <1 |
| 2,2-Dichloropropane | <1 | Bromobenzene | <1 |
| cis-1,2-Dichloroethene | <1 | 1,3,5-Trimethylbenzene | <1 |
| Chloroform | <1 | 1,1,2,2-Tetrachloroethane | <1 |
| 2-Butanone (MEK) | <20 | 1,2,3-Trichloropropane | <1 |
| 1,2-Dichloroethane (EDC) | <1 | 2-Chlorotoluene | <1 |
| 1,1,1-Trichloroethane | <1 | 4-Chlorotoluene | <1 |
| 1,1-Dichloropropene | <1 | tert-Butylbenzene | <1 |
| Carbon tetrachloride | <1 | 1,2,4-Trimethylbenzene | <1 |
| Benzene | <0.35 | sec-Butylbenzene | <1 |
| Trichloroethene | <1 | p-Isopropyltoluene | <1 |
| 1,2-Dichloropropane | <1 | 1,3-Dichlorobenzene | <1 |
| Bromodichloromethane | <1 | 1,4-Dichlorobenzene | <1 |
| Dibromomethane | <1 | 1,2-Dichlorobenzene | <1 |
| 4-Methyl-2-pentanone | <10 | 1,2-Dibromo-3-chloropropane | <10 |
| cis-1,3-Dichloropropene | <1 | 1,2,4-Trichlorobenzene | <1 |
| Toluene | <1 | Hexachlorobutadiene | <1 |
| trans-1,3-Dichloropropene | <1 | Naphthalene | <1 |
| 1,1,2-Trichloroethane | <1 | 1,2,3-Trichlorobenzene | <1 |
| 2-Hexanone | <10 | | |

Date of Report: 03/04/21
Date Received: 02/24/21
Project: 430528-Wactor Tacoma, F&BI 102366

## QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TPH AS GASOLINE USING METHOD NWTPH-Gx

Laboratory Code: 102337-01 (Duplicate)

| Analyte | Reporting Units | Sample Result | Duplicate Result | RPD (Limit 20) |
|---|---|---|---|---|
| Gasoline | ug/L (ppb) | 110 | 120 | 15 |

Laboratory Code: Laboratory Control Sample

| Analyte | Reporting Units | Spike Level | Percent Recovery LCS | Acceptance Criteria |
|---|---|---|---|---|
| Gasoline | ug/L (ppb) | 1,000 | 105 | 69-134 |

Date of Report: 03/04/21
Date Received: 02/24/21
Project: 430528-Wactor Tacoma, F&BI 102366

## QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL EXTENDED USING METHOD NWTPH-Dx

Laboratory Code: Laboratory Control Sample

| Analyte | Reporting Units | Spike Level | Percent Recovery LCS | Percent Recovery LCSD | Acceptance Criteria | RPD (Limit 20) |
|---|---|---|---|---|---|---|
| Diesel Extended | ug/L (ppb) | 2,500 | 88 | 96 | 63-142 | 9 |

Date of Report: 03/04/21
Date Received: 02/24/21
Project: 430528-Wactor Tacoma, F&BI 102366

## QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR VOLATILES BY EPA METHOD 8260D

Laboratory Code: 102335-01 (Matrix Spike)

| Analyte | Reporting Units | Spike Level | Sample Result | Percent Recovery MS | Acceptance Criteria |
|---|---|---|---|---|---|
| Dichlorodifluoromethane | ug/L (ppb) | 10 | <1 | 110 | 10-172 |
| Chloromethane | ug/L (ppb) | 10 | <10 | 83 | 25-166 |
| Vinyl chloride | ug/L (ppb) | 10 | <0.2 | 92 | 36-166 |
| Bromomethane | ug/L (ppb) | 10 | <5 | 135 | 47-169 |
| Chloroethane | ug/L (ppb) | 10 | <1 | 93 | 46-160 |
| Trichlorofluoromethane | ug/L (ppb) | 10 | <1 | 97 | 44-165 |
| Acetone | ug/L (ppb) | 50 | <50 | 88 | 10-182 |
| 1,1-Dichloroethene | ug/L (ppb) | 10 | <1 | 106 | 58-142 |
| Hexane | ug/L (ppb) | 10 | <5 | 95 | 38-152 |
| Methylene chloride | ug/L (ppb) | 10 | <5 | 92 | 50-145 |
| Methyl t-butyl ether (MTBE) | ug/L (ppb) | 10 | <1 | 96 | 61-136 |
| trans-1,2-Dichloroethene | ug/L (ppb) | 10 | <1 | 97 | 61-136 |
| 1,1-Dichloroethane | ug/L (ppb) | 10 | <1 | 93 | 63-135 |
| 2,2-Dichloropropane | ug/L (ppb) | 10 | <1 | 101 | 36-154 |
| cis-1,2-Dichloroethene | ug/L (ppb) | 10 | <1 | 94 | 63-134 |
| Chloroform | ug/L (ppb) | 10 | <1 | 99 | 61-135 |
| 2-Butanone (MEK) | ug/L (ppb) | 50 | <20 | 100 | 10-129 |
| 1,2-Dichloroethane (EDC) | ug/L (ppb) | 10 | <1 | 97 | 48-149 |
| 1,1,1-Trichloroethane | ug/L (ppb) | 10 | <1 | 98 | 60-146 |
| 1,1-Dichloropropene | ug/L (ppb) | 10 | <1 | 100 | 69-133 |
| Carbon tetrachloride | ug/L (ppb) | 10 | <1 | 106 | 56-152 |
| Benzene | ug/L (ppb) | 10 | <0.35 | 97 | 57-135 |
| Trichloroethene | ug/L (ppb) | 10 | <1 | 99 | 66-135 |
| 1,2-Dichloropropane | ug/L (ppb) | 10 | <1 | 91 | 59-136 |
| Bromodichloromethane | ug/L (ppb) | 10 | <1 | 92 | 61-150 |
| Dibromomethane | ug/L (ppb) | 10 | <1 | 103 | 66-141 |
| 4-Methyl-2-pentanone | ug/L (ppb) | 50 | <10 | 104 | 10-185 |
| cis-1,3-Dichloropropene | ug/L (ppb) | 10 | <1 | 95 | 52-147 |
| Toluene | ug/L (ppb) | 10 | <1 | 94 | 50-137 |
| trans-1,3-Dichloropropene | ug/L (ppb) | 10 | <1 | 89 | 53-142 |
| 1,1,2-Trichloroethane | ug/L (ppb) | 10 | <1 | 97 | 68-131 |
| 2-Hexanone | ug/L (ppb) | 50 | <10 | 103 | 10-185 |
| 1,3-Dichloropropane | ug/L (ppb) | 10 | <1 | 95 | 60-135 |
| Tetrachloroethene | ug/L (ppb) | 10 | <1 | 102 | 10-226 |
| Dibromochloromethane | ug/L (ppb) | 10 | <1 | 92 | 52-145 |
| 1,2-Dibromoethane (EDB) | ug/L (ppb) | 10 | <1 | 100 | 62-135 |
| Chlorobenzene | ug/L (ppb) | 10 | <1 | 101 | 63-130 |
| Ethylbenzene | ug/L (ppb) | 10 | <1 | 95 | 60-133 |
| 1,1,1,2-Tetrachloroethane | ug/L (ppb) | 10 | <1 | 95 | 56-143 |
| m,p-Xylene | ug/L (ppb) | 20 | <2 | 98 | 69-135 |
| o-Xylene | ug/L (ppb) | 10 | <1 | 98 | 60-140 |
| Styrene | ug/L (ppb) | 10 | <1 | 96 | 60-133 |
| Isopropylbenzene | ug/L (ppb) | 10 | <1 | 95 | 65-142 |
| Bromoform | ug/L (ppb) | 10 | <5 | 90 | 54-148 |
| n-Propylbenzene | ug/L (ppb) | 10 | <1 | 93 | 58-144 |
| Bromobenzene | ug/L (ppb) | 10 | <1 | 97 | 61-130 |
| 1,3,5-Trimethylbenzene | ug/L (ppb) | 10 | <1 | 92 | 59-134 |
| 1,1,2,2-Tetrachloroethane | ug/L (ppb) | 10 | <1 | 92 | 51-154 |
| 1,2,3-Trichloropropane | ug/L (ppb) | 10 | <1 | 94 | 53-150 |
| 2-Chlorotoluene | ug/L (ppb) | 10 | <1 | 91 | 66-127 |
| 4-Chlorotoluene | ug/L (ppb) | 10 | <1 | 93 | 65-130 |
| tert-Butylbenzene | ug/L (ppb) | 10 | <1 | 91 | 65-137 |
| 1,2,4-Trimethylbenzene | ug/L (ppb) | 10 | <1 | 88 | 59-146 |
| sec-Butylbenzene | ug/L (ppb) | 10 | <1 | 91 | 64-140 |
| p-Isopropyltoluene | ug/L (ppb) | 10 | <1 | 93 | 65-141 |
| 1,3-Dichlorobenzene | ug/L (ppb) | 10 | <1 | 97 | 60-131 |
| 1,4-Dichlorobenzene | ug/L (ppb) | 10 | <1 | 98 | 60-129 |
| 1,2-Dichlorobenzene | ug/L (ppb) | 10 | <1 | 96 | 60-130 |
| 1,2-Dibromo-3-chloropropane | ug/L (ppb) | 10 | <10 | 84 | 32-164 |
| 1,2,4-Trichlorobenzene | ug/L (ppb) | 10 | <1 | 93 | 52-138 |
| Hexachlorobutadiene | ug/L (ppb) | 10 | <1 | 92 | 60-143 |
| Naphthalene | ug/L (ppb) | 10 | <1 | 88 | 44-164 |
| 1,2,3-Trichlorobenzene | ug/L (ppb) | 10 | <1 | 88 | 69-148 |

Date of Report: 03/04/21
Date Received: 02/24/21
Project: 430528-Wactor Tacoma, F&BI 102366

## QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF WATER SAMPLES FOR VOLATILES BY EPA METHOD 8260D

Laboratory Code: Laboratory Control Sample

| Analyte | Reporting Units | Spike Level | Percent Recovery LCS | Percent Recovery LCSD | Acceptance Criteria | RPD (Limit 20) |
|---|---|---|---|---|---|---|
| Dichlorodifluoromethane | ug/L (ppb) | 10 | 105 | 105 | 25-158 | 0 |
| Chloromethane | ug/L (ppb) | 10 | 82 | 80 | 45-156 | 2 |
| Vinyl chloride | ug/L (ppb) | 10 | 89 | 89 | 50-154 | 0 |
| Bromomethane | ug/L (ppb) | 10 | 138 | 130 | 55-143 | 6 |
| Chloroethane | ug/L (ppb) | 10 | 90 | 87 | 58-146 | 3 |
| Trichlorofluoromethane | ug/L (ppb) | 10 | 94 | 96 | 50-150 | 2 |
| Acetone | ug/L (ppb) | 50 | 80 | 78 | 22-155 | 3 |
| 1,1-Dichloroethene | ug/L (ppb) | 10 | 101 | 102 | 67-136 | 1 |
| Hexane | ug/L (ppb) | 10 | 78 | 77 | 57-137 | 1 |
| Methylene chloride | ug/L (ppb) | 10 | 95 | 91 | 19-178 | 4 |
| Methyl t-butyl ether (MTBE) | ug/L (ppb) | 10 | 93 | 92 | 64-147 | 1 |
| trans-1,2-Dichloroethene | ug/L (ppb) | 10 | 93 | 95 | 68-128 | 2 |
| 1,1-Dichloroethane | ug/L (ppb) | 10 | 91 | 91 | 74-135 | 0 |
| 2,2-Dichloropropane | ug/L (ppb) | 10 | 94 | 95 | 55-143 | 1 |
| cis-1,2-Dichloroethene | ug/L (ppb) | 10 | 95 | 95 | 74-136 | 0 |
| Chloroform | ug/L (ppb) | 10 | 96 | 97 | 74-134 | 1 |
| 2-Butanone (MEK) | ug/L (ppb) | 50 | 96 | 95 | 37-150 | 1 |
| 1,2-Dichloroethane (EDC) | ug/L (ppb) | 10 | 98 | 96 | 66-129 | 2 |
| 1,1,1-Trichloroethane | ug/L (ppb) | 10 | 98 | 97 | 74-142 | 1 |
| 1,1-Dichloropropene | ug/L (ppb) | 10 | 95 | 94 | 77-129 | 1 |
| Carbon tetrachloride | ug/L (ppb) | 10 | 101 | 101 | 75-158 | 0 |
| Benzene | ug/L (ppb) | 10 | 95 | 95 | 69-134 | 0 |
| Trichloroethene | ug/L (ppb) | 10 | 96 | 94 | 67-133 | 2 |
| 1,2-Dichloropropane | ug/L (ppb) | 10 | 93 | 90 | 71-134 | 3 |
| Bromodichloromethane | ug/L (ppb) | 10 | 90 | 89 | 66-126 | 1 |
| Dibromomethane | ug/L (ppb) | 10 | 103 | 98 | 68-132 | 5 |
| 4-Methyl-2-pentanone | ug/L (ppb) | 50 | 104 | 100 | 65-138 | 4 |
| cis-1,3-Dichloropropene | ug/L (ppb) | 10 | 93 | 91 | 74-140 | 2 |
| Toluene | ug/L (ppb) | 10 | 96 | 93 | 72-122 | 3 |
| trans-1,3-Dichloropropene | ug/L (ppb) | 10 | 88 | 86 | 80-136 | 2 |
| 1,1,2-Trichloroethane | ug/L (ppb) | 10 | 94 | 93 | 75-124 | 1 |
| 2-Hexanone | ug/L (ppb) | 50 | 103 | 99 | 60-136 | 4 |
| 1,3-Dichloropropane | ug/L (ppb) | 10 | 96 | 92 | 76-126 | 4 |
| Tetrachloroethene | ug/L (ppb) | 10 | 99 | 98 | 76-121 | 1 |
| Dibromochloromethane | ug/L (ppb) | 10 | 92 | 90 | 84-133 | 2 |
| 1,2-Dibromoethane (EDB) | ug/L (ppb) | 10 | 99 | 95 | 82-115 | 4 |
| Chlorobenzene | ug/L (ppb) | 10 | 100 | 97 | 83-114 | 3 |
| Ethylbenzene | ug/L (ppb) | 10 | 94 | 93 | 77-124 | 1 |
| 1,1,1,2-Tetrachloroethane | ug/L (ppb) | 10 | 95 | 95 | 84-127 | 0 |
| m,p-Xylene | ug/L (ppb) | 20 | 96 | 95 | 81-112 | 1 |
| o-Xylene | ug/L (ppb) | 10 | 97 | 95 | 81-121 | 2 |
| Styrene | ug/L (ppb) | 10 | 95 | 92 | 84-119 | 3 |
| Isopropylbenzene | ug/L (ppb) | 10 | 92 | 92 | 80-117 | 0 |
| Bromoform | ug/L (ppb) | 10 | 89 | 86 | 69-121 | 3 |
| n-Propylbenzene | ug/L (ppb) | 10 | 92 | 89 | 74-126 | 3 |
| Bromobenzene | ug/L (ppb) | 10 | 99 | 96 | 80-121 | 3 |
| 1,3,5-Trimethylbenzene | ug/L (ppb) | 10 | 91 | 89 | 78-123 | 2 |
| 1,1,2,2-Tetrachloroethane | ug/L (ppb) | 10 | 96 | 93 | 66-126 | 3 |
| 1,2,3-Trichloropropane | ug/L (ppb) | 10 | 95 | 92 | 67-124 | 3 |
| 2-Chlorotoluene | ug/L (ppb) | 10 | 92 | 89 | 77-127 | 3 |
| 4-Chlorotoluene | ug/L (ppb) | 10 | 92 | 89 | 78-128 | 3 |
| tert-Butylbenzene | ug/L (ppb) | 10 | 91 | 90 | 80-123 | 1 |
| 1,2,4-Trimethylbenzene | ug/L (ppb) | 10 | 88 | 86 | 79-122 | 2 |
| sec-Butylbenzene | ug/L (ppb) | 10 | 90 | 88 | 80-116 | 2 |
| p-Isopropyltoluene | ug/L (ppb) | 10 | 90 | 88 | 81-123 | 2 |
| 1,3-Dichlorobenzene | ug/L (ppb) | 10 | 96 | 94 | 83-113 | 2 |
| 1,4-Dichlorobenzene | ug/L (ppb) | 10 | 94 | 95 | 81-112 | 1 |
| 1,2-Dichlorobenzene | ug/L (ppb) | 10 | 95 | 95 | 84-112 | 0 |
| 1,2-Dibromo-3-chloropropane | ug/L (ppb) | 10 | 86 | 86 | 57-141 | 0 |
| 1,2,4-Trichlorobenzene | ug/L (ppb) | 10 | 88 | 89 | 72-130 | 1 |
| Hexachlorobutadiene | ug/L (ppb) | 10 | 85 | 84 | 53-141 | 1 |
| Naphthalene | ug/L (ppb) | 10 | 91 | 90 | 64-133 | 1 |
| 1,2,3-Trichlorobenzene | ug/L (ppb) | 10 | 90 | 89 | 65-136 | 1 |

# Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for the analyte were outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte may be due to carryover from previous sample injections.

cf - The sample was centrifuged prior to analysis.

d - The sample was diluted. Detection limits were raised and surrogate recoveries may not be meaningful.

dv - Insufficient sample volume was available to achieve normal reporting limits.

f - The sample was laboratory filtered prior to analysis.

fb - The analyte was detected in the method blank.

fc - The analyte is a common laboratory and field contaminant.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. Variability is attributed to sample inhomogeneity.

hs - Headspace was present in the container used for analysis.

ht – The analysis was performed outside the method or client-specified holding time requirement.

ip - Recovery fell outside of control limits due to sample matrix effects.

j - The analyte concentration is reported below the lowest calibration standard. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The laboratory control sample(s) percent recovery and/or RPD were out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the analyte is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc - The sample was received with incorrect preservation or in a container not approved by the method. The value reported should be considered an estimate.

ve - The analyte response exceeded the valid instrument calibration range. The value reported is an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

102366

# SAMPLE CHAIN OF CUSTODY

ME 02/24/21 VW1 / E03

Page # 1 of 1

Report To Doug Kunkel

Company TRC

Address 1180 NW Maple St, Ste 310

City, State, ZIP Issaquah, WA 98027

Phone (425) 395-0010 Email DKunkel@trccompanies.com

SAMPLERS (*signature*) Rebeca Odell

PROJECT NAME: 430528 - Wactor Tacoma

PO #:

REMARKS: Project specific RLs? - Yes / No

INVOICE TO:

TURNAROUND TIME
- [x] Standard turnaround
- [ ] RUSH
- Rush charges authorized by:

SAMPLE DISPOSAL
- [ ] Archive samples
- [ ] Other
- Default: Dispose after 30 days

| Sample ID | Lab ID | Date Sampled | Time Sampled | Sample Type | # of Jars | NWTPH-Dx | NWTPH-Gx | BTEX EPA 8021 | NWTPH-HCID | VOCs EPA 8260 | PAHs EPA 8270 | PCBs EPA 8082 | | | | | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | ANALYSES REQUESTED | | | | | | | | | | | |
| MW-11 | 01A-G | 2/23/21 | 1038 | H2O | 7 | X | X | | | X | | | | | | | GRO, DRO/ORO, and VOCs |
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| SIGNATURE | PRINT NAME | COMPANY | DATE | TIME |
|---|---|---|---|---|
| Relinquished by: Rebeca Odell | Rebeca O'Dell | TRC | 2/24/21 | 0631 |
| Received by: | Michael Erdahl | FEBA | 2/24/21 | 0631 |
| Relinquished by: | | | | |
| Received by: | | Samples received at 4 °C | | |

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