

To: Steve Teel, Department of Ecology

From: Tasya Gray, Taylor Way and Alexander Avenue Fill Area (TWAAFA) Agreed Order Potentially Liable Parties Group Project Coordinator

Date: March 5, 2021

Subject: TWAAFA Aboveground Site Conditions Memorandum

This memorandum provides information regarding current site conditions for each parcel included in the Taylor Way and Alexander Avenue Fill (TWAAFA) Site, as required under section 5.1 of the Final Data Gaps Work Plan (DGWP) (DOF, 2020). Site conditions related to the following are discussed:

- Existing buildings;
- · Catch basins and manholes;
- Impervious areas;
- Potentially pervious areas;
- Outfalls:
- Paved areas;
- Utility vaults;
- Other aboveground structures such as tanks, containment areas, floor/roof drains, and fences; and
- Obviously filled or elevated piles of soil/gravel.

Updating the aboveground site conditions figures is necessary due to construction activities completed since major Remedial Investigation reports were completed for the various parcels. These updates will support future soil and groundwater data collection and will be used to aid in the assessment of potential risk in existing buildings due to possible soil vapor contamination as well as inform feasibility study and remedy planning.

The effective date of the Washington State Department of Ecology (Ecology) Agreed Order (AO) No. DE 14260 was December 4, 2020. The Final DGWP specified that field inspections would be performed within 30 days of the effective date of the AO. On January 5, 2021, a 30-day extension to the field inspection tasks was requested by the AO Potential Liable Parties (PLPs) and approved by Ecology, effectively extending the inspection deadline to February 4, 2021 to allow for resolution of access to parcels not owned by one of the AO PLPs.

Inspections were completed for the Port of Tacoma (PoT) properties and a portion of the Burlington Environmental (BE) property on January 14, 2021. Additional inspections were completed on February 3, 2021 to inspect the remainder of the BE property and the former CleanCare Corporation property (CleanCare). Aboveground conditions observed during the inspections are presented below by property. Each property location is shown on Figure 1. A photo log is attached, showing various areas of each property and significant features.



1205 Alexander Avenue/1300 Taylor Way (Hylebos Marsh) Property

The site inspection was completed by Dalton, Olmsted, & Fuglevand, Inc. (DOF) personnel on January 14, 2021, and DOF personnel were escorted by Scott Hooton of the PoT. Aboveground site conditions for the property are provided in Figure 2. The property was observed to be undeveloped, undulating, vegetated land with large areas of ponded water.

Buildings: none

Defining characteristics: The entire property is unpaved and undeveloped.

Access: The full property was visible during the inspection and accessible. The property is unfenced on several sides. The property is owned by PoT; the access agreement for AO PLPs to perform invasive sampling work is pending a defined schedule and scope of work, to be determined by this inspection and accompanying well evaluation.

General: Low grasses and blackberry plants were observed across most of the property, and one area of cattails, where ground surface was lower. Several shallow ditches and depressions were observed. No buildings, above ground structures, catch basins, utilities, or paved areas were present on the property. A small gravel area (approximately 5,000 square feet) on the north side of the property, off Taylor Way, is used for parking while on site. A slightly elevated road traverses the property, entering from the south off Alexander Avenue and crossing northeast to the eastern side of the property where the site grade raises up several feet (Picture 2). The eastern side of the property is raised in elevation several feet higher than the rest of the property and debris was noted as eroding out of the bank at the location of the elevation transition (Picture 5).

Burlington Environmental Property

Inspection of the property was completed on January 14, 2021 and February 3, 2021. The Burlington Environmental (BE) property includes several operational areas of the property: Parcel A, North Truck Parking, Permitted Transfer, Storage, and Disposal (TSD) Facility, Transportation Services, and the Offices/Parking. Aboveground site conditions are shown on Figures 3 and 4.

Buildings: Several structures are present on the active TSD Operation Area consisting of open-air buildings with open sides. The exceptions are the lab pack building, the stabilization building, and two office buildings. The lab pack building has a sub-slab depressurization system to prevent soil vapors from entering the active waste handling areas within the building. This system was described in the Data Gaps Work Plan (DOF, 2020). The stabilization building operations includes a 20,000 cubic foot per minute (CFM) blower for operation of a dust collection system during treatment of waste and louvered vents in the building for passive ventilation during non-operational periods. The laboratory/office building constructed in 2019 sits on a concrete slab on top of a vapor barrier. Subfloor air sampling in the crawlspace was conducted and reported to Ecology beneath the northernmost of these operation buildings, as described in the Data Gaps Work Plan (DOF, 2020). The operation office building present within the Active TSD Operations area have passive ventilation between the ground surface and the building floor.



Three buildings are present in the Administrative Offices/Parking area. The three buildings that make up the offices are elevated modular buildings with passive ventilation between the ground surface and the building floor.

One building is present in the Transportation Services area in the southwest corner of the property, near Alexander Avenue, consisting of office space and shop bays. During operations in the shop area, the bay doors of the building remain open allowing for natural ventilation of the shop. The offices in the building are standard slab-on-grade construction with a finished interior.

Defining characteristics: The property is mostly paved or developed. Several buildings exist, though the only location on the BE property recommended for evaluation of the potential for vapor intrusion risk is the transportation office. The vapor pathway is expected to be incomplete for all other structures due to structures having existing vapor mitigation systems or verification testing performed, are open-air construction style, or are elevated from the ground allowing for natural ventilation of potential vapors.

The transportation building on the BE property, specifically the offices, could present a potential for vapor intrusion due to building design. Site data were reviewed near this building, consistent with the April 2018 Ecology *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action*. Groundwater in the vicinity of the building (direct push samples or monitoring well samples) were non-detect or below screening levels for constituents with the potential to partition into the vapor phase. See Table 18 for historic data and Figure 3 for well locations in the Data Gaps Work Plan. Additional groundwater monitoring is planned for wells near the transportation building as part of the Data Gaps work to collect current information.

Access: The entire property is fenced and subdivided by additional fences and levels of security depending on operational uses.

General:

Parcel A

Parcel A is a vacant 1.18 acre area with generally flat topography. The area was historically excavated and capped as part of regulatory closure of the area. The capped area is covered in grass and surrounded by fencing. The remainder of the area is gravel. At the north end of Parcel A, spare equipment was observed. On the northern edge of the area, ponded water was observed during the inspection. No stormwater infrastructure, outfalls, paved areas, or utilities were observed during the inspection. A small open-air shack is present outside the fence and appeared to be in use as the designated smoking area for the TSD facility.

North Trailer Parking Lot/10-Day Lot

The north truck parking lot is an approximately 10-acre asphalt paved area that is generally flat north of the active TSD operations area of the property. The area was redeveloped and paved in 2019. Redevelopment involved the installation of stormwater infrastructure, including two large treatment swales and discharge to the City of Tacoma infrastructure below Taylor Way. Figure 4 presents updated information related to the redevelopment (paving and new stormwater infrastructure).



During the inspection, curbing around the perimeter of the paved area was observed, preventing sheet flow of stormwater from flowing off the pavement. Outside the paved areas, grassy areas were observed with some ponded water observed on the eastern side adjacent to the access road to the CleanCare parcel at the bottom of the grade change between the TSD facility paved area and the roadway.

Active TSD Operation Areas

The active TSD operation areas are where active waste handling operations occur. The active area includes the following: storage areas, process areas, the tank farm, a laboratory, operation offices, and load/unloading areas, as shown on Figure 4. All active waste handling areas are paved with concrete.

Numerous above ground tanks are in use at the facility related to waste handling operations. The tank farm is the primary location of the tanks and tanks are segregated into separate containment areas in accordance with chemical compatibility. Waste intake and sorting is also segregated into separate areas in accordance with chemical compatibility.

Stormwater within this area is managed per the City of Tacoma National Pollutant Discharge Elimination System (NPDES) permit number TAC-007-2017 and Industrial Stormwater General Permit (ISGP) number WAR-009977 depending on potential for contact with waste. Contaminated and contact stormwater are contained and treated prior to discharge to the City of Tacoma Public Owned Treatment Works (POTW). General industrial stormwater is allowed to flow into swales and rain gardens for treatment before discharge to the City of Tacoma stormwater conveyance system. Best management practices (BMPs) are present between general industrial stormwater areas and the contaminated and contact stormwater areas, preventing stormwater comingling between the two areas. These areas are shown on Figure 4.

Administrative Offices and Parking

Administrative offices and employee parking area are located at the south end of the property, off Alexander Avenue. The parking area and areas below the offices are paved with asphalt and at the south end of the area, a rain garden is present for collection and evaporation/discharge of stormwater from the paved area. A stormwater conveyance swale is present on the east side of the area that discharges to the City of Tacoma conveyance system as well. Both the rain garden and swale were installed in 2019 as part of facility stormwater improvements.

Transportation Office and Shop

The transportation office and shop are a single building with offices at the south end and the shop area at the north end of the building. The area south and east of the building is paved with asphalt and stormwater collects in catch basins before being conveyed to the rain garden discussed above. A paved drive lane between the entrance gate and the north truck parking area is paved with asphalt and west of the drive lane, to the eastern property line is gravel used as additional truck parking area.

Potter Property

The site inspection was completed by DOF personnel on January 14, 2021, and DOF personnel were escorted by Scott Hooton of the PoT. Aboveground site conditions for the property are



provided in Figure 5. The property is improved with three light industrial outbuildings used for semi-truck trailer repair and modification.

Buildings: Two buildings on the west side of the property are Quonset style structures (approximately 4,000 square feet (SF) each) and a third building is a timber shell building structure (approximately 4,800 SF) with a high ceiling to facilitate trailer repairs. When each of the three structures is in use, large doors at either end were observed to be open to allow movement of trailers throughout the day. Due to the condition and use (open air ventilation) of each of the three structures on site, the pathway to indoor air is expected to be incomplete.

Defining characteristics: The property is in active use. The property is relatively flat with hard surfaces that appeared to be in poor repair or unpaved in most of the parcel. Inspecting during the drier season may allow for better pavement inspection, though access would be challenging due to trailer parking and material storage. A subsurface LNAPL capture trench was documented as present on this parcel in the Data Gaps Work Plan (DOF, 2020) but was not inspected as part of the site inspection because truck trailers were parked on top of this area.

Access: The property was mostly accessible during the site inspection, though much of the property has trailers parked over it and/or equipment or material storage that made inspection of some areas not feasible. The property is fully fenced. The property is owned by PoT; the access agreement for AO PLPs to perform invasive sampling work is pending a defined schedule and scope of work, to be determined by this inspection and accompanying well evaluation.

General: The property outside of the buildings is used for trailer parking and material storage related to trailer repair. The property is flat and the surface finish appeared to be concrete inside the buildings and gravel across the remainder (interior of buildings were not toured as part of the site inspection). No catch basins or stormwater infrastructure was observed during the site visit and water ponding was present in the southwest corner of the parcel, indicating stormwater surface flows to this area. No other structures were observed during the site inspection.

Former CleanCare Property

The site inspection was completed by DOF personnel on February 3, 2020 and DOF personnel were escorted by Rick Tackett from the Pierce County Department of Facilities Management. Aboveground site conditions discussed below are shown on Figure 6.

Buildings: As described in the Data Gaps Work Plan (DOF, 2020), the property has five buildings (Buildings 1-5) and two open-air overhang structures (Buildings 6 & 7), as shown in Figure 6. None of the buildings or structures on the property are in use or will be used in their current condition. All buildings were unsecured and were accessible, but some have limited access due to trash and debris present inside of them. The buildings have been severed and stripped of utilities, windows are broken and/or missing, interior walls and finished surfaces are in poor and/or damaged condition, and abundant debris is present in most buildings. Thus, future use of the existing buildings and/or structures will require, at least, some level of remodel/modification. However, the buildings appeared to be structurally sound during the site inspection and Pierce County indicated they have no intention of demolishing the structures. Soil vapor sampling for the property will be completed under the Data Gaps Work Plan (DOF,



2020) to provide data that will allow for further evaluation if soil gas is a potential hazard to indoor air for future site use.

Defining characteristics: The property is abandoned, in disrepair, and not fully secured. There are numerous aboveground structures and debris present across the property.

Access: The property was mostly accessible during the site inspection, though trash and brush blocked access to some parts of the property, and stormwater ponds in several areas identified as part of the site inspection. The property is partially fenced, as noted on Figure 5, with fencing removed or failing in some areas, and evidence of trespass in multiple areas of the property. The property is owned by Pierce County; the draft access agreement for AO PLPs to perform invasive sampling work is pending review by various County parties.

General: The property is mostly paved with asphalt, though concrete was observed in some areas, and most of the peripheral areas of the property are covered in vegetation (blackberries, grasses, and some trees and shrubs). The approximate outline of paving as observed during the site inspection is shown on Figure 6. The outline of the former tank farm area at the north end of the property was still in place, though only partially surrounds that area and is open on the east side. Soil mounding was observed west of the former tank farm area, adjacent to the western property line. This was the only mounded soil identified during the site inspection.

Stormwater ponding was observed in the south end of the former tank farm area, in the former processing area, in the southern end of the asphalt paved area, and inside several containment areas at the south end of the property. No stormwater ponding was observed in the gravel areas surrounding the paved areas, although some of the areas could not be inspected due to brush growth along the western, northern, and eastern property lines. No catch basins or evidence of subsurface stormwater infrastructure was observed during the site inspection, though sumps were present in some buildings.

Debris and abandoned equipment was located in multiple areas of the property. The photo log contains documentation of the type of debris/equipment encountered including:

- Two aboveground tanks at the south end of the property (access ports were open) and an abandoned concrete mixing trailer.
- Other tanks, equipment, and piping from the former processing area, around Building 6, outside Building 3, and inside Building 2.
- A semi-truck trailer parked inside Building 5.
- Several empty poly totes inside Building 5 and a drum that appeared empty outside Building 5.
- Several drums, dated from 2008, in the former tank farm area that DOF alerted Ecology about following the site inspection. They appear to contain soil and water.
- Trash piles in the former tank farm area, Building 4, and Building 1. Trash included a variety of office, industrial equipment, stripped utilities remnants, and general rubbish indicative of site trespass since closure of the property.



1514 Taylor Way Property

The site inspection was completed by DOF personnel on January 14, 2021, and DOF personnel were escorted by Scott Hooton of the PoT. Aboveground site conditions discussed above are shown on Figures 7 and 8.

Buildings: The property is improved with two recently constructed (2019) concrete tilt-up structures, primarily used for warehousing purposes. The northern building is 155,000 SF and the southern building is 51,900 SF and the two structures share a 175,000 SF paved truck court.

Vapor intrusion potential was assessed as part of building construction. Per a May 11, 2020 Ecology letter, "Response to the Port of Tacoma, Informal Dispute Notice," Ecology acknowledged no further assessment or mitigation of methane was required for the property. The letter also acknowledged the PoT's efforts to reduce the potential chloroform vapor intrusion into each of the buildings (Ecology, 2020). Due to Ecology concurrence regarding soil vapor assessment, additional soil vapor assessment for the site is not recommended.

Defining characteristics: The property is newly developed, in active use, and mostly paved apart from small areas of landscaping and stormwater management features.

Access: The property was mostly accessible during the site inspection; the interior of buildings was not sought during the inspection. The property is mostly fenced; fencing was missing in one area between the property and the former CleanCare parcel and there is an open driveway entrance onto the property from Taylor Way. The property is owned by PoT; the access agreement for AO PLPs to perform invasive sampling work is pending a defined schedule and scope of work, to be determined by this inspection and accompanying well evaluation.

General: A stormwater retention pond is present at the south end of the property. Stormwater catch basins were observed throughout the site, but alignment and flow of stormwater, including discharge were not confirmed as part of the site inspection. DOF will request additional information about the stormwater pond construction from the PoT as part of ongoing data gaps work.

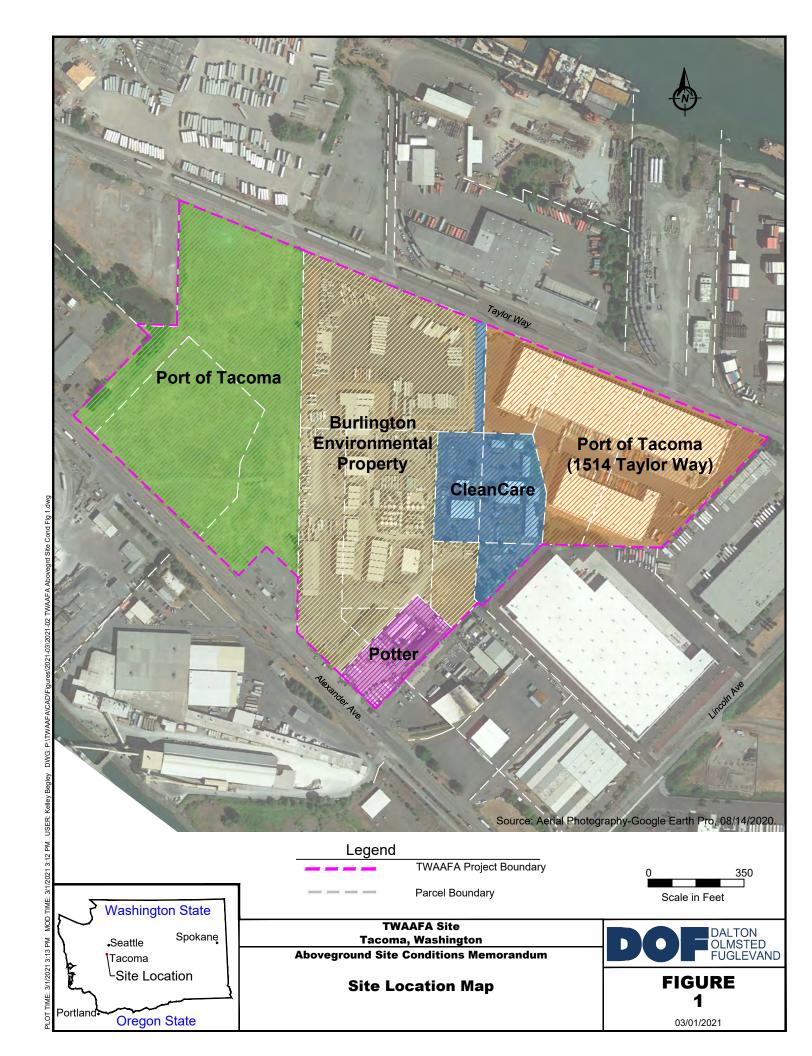
References

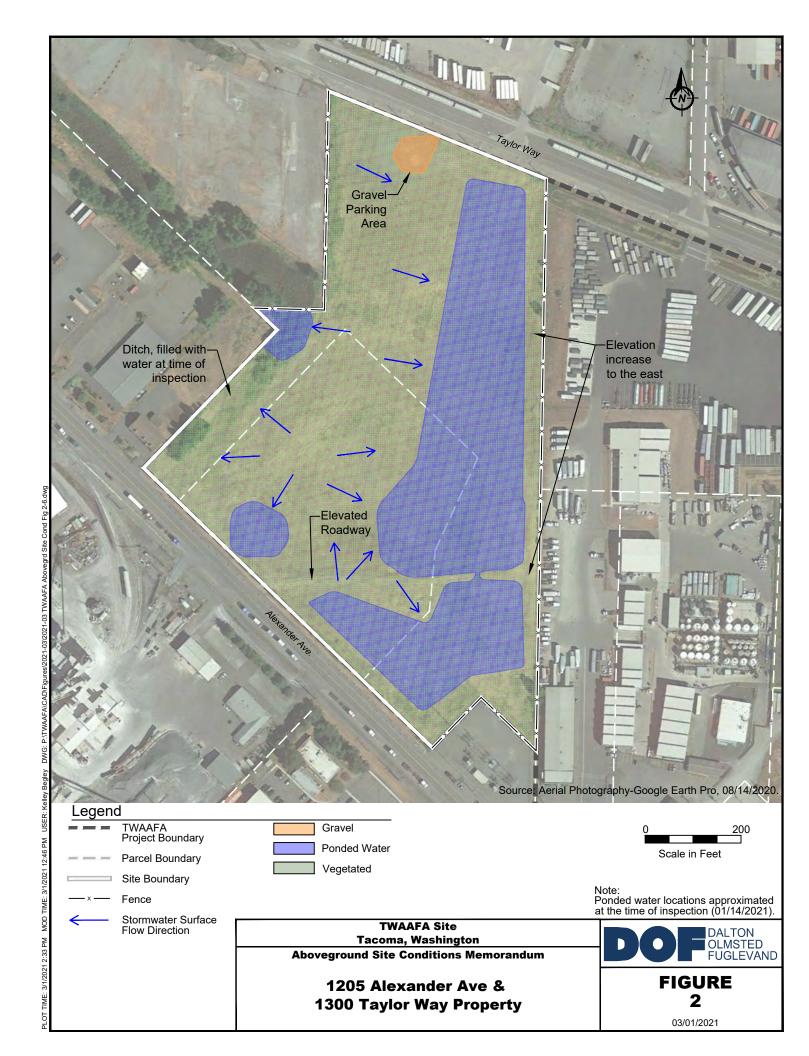
Washington State Department of Ecology (Ecology), 2018a. Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action. April.

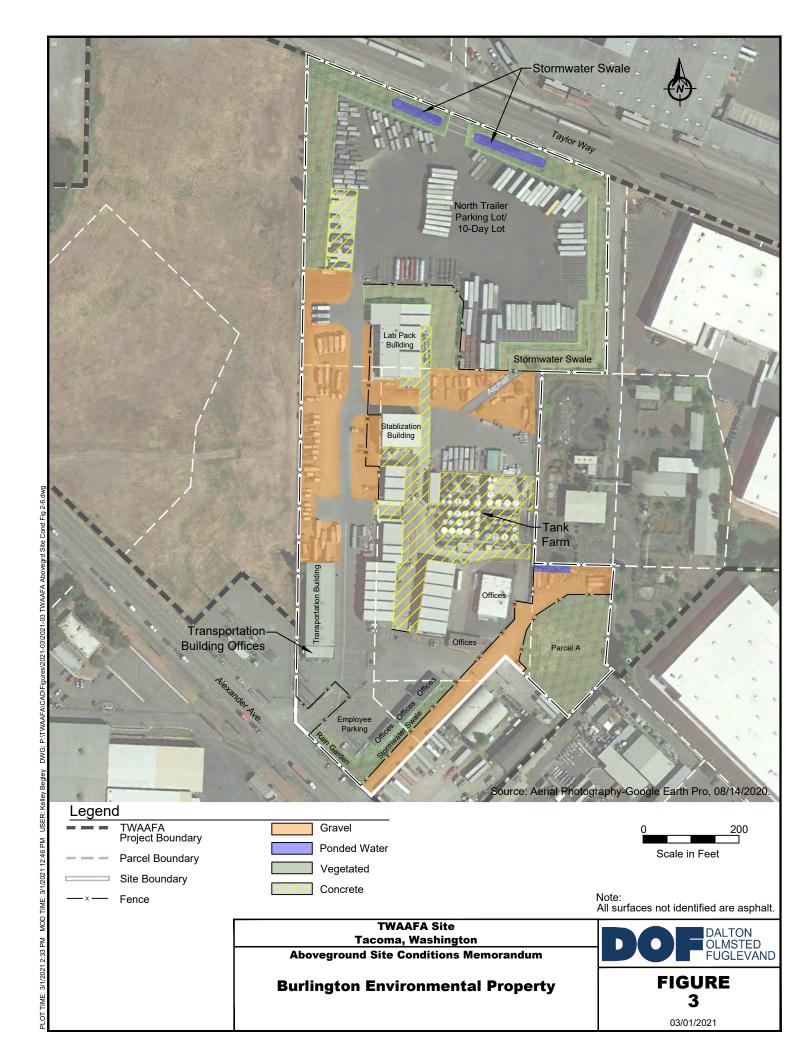
Washington State Department of Ecology (Ecology), 2020. Re: Response to Port of Tacoma, Informational Dispute Notice. May 11.

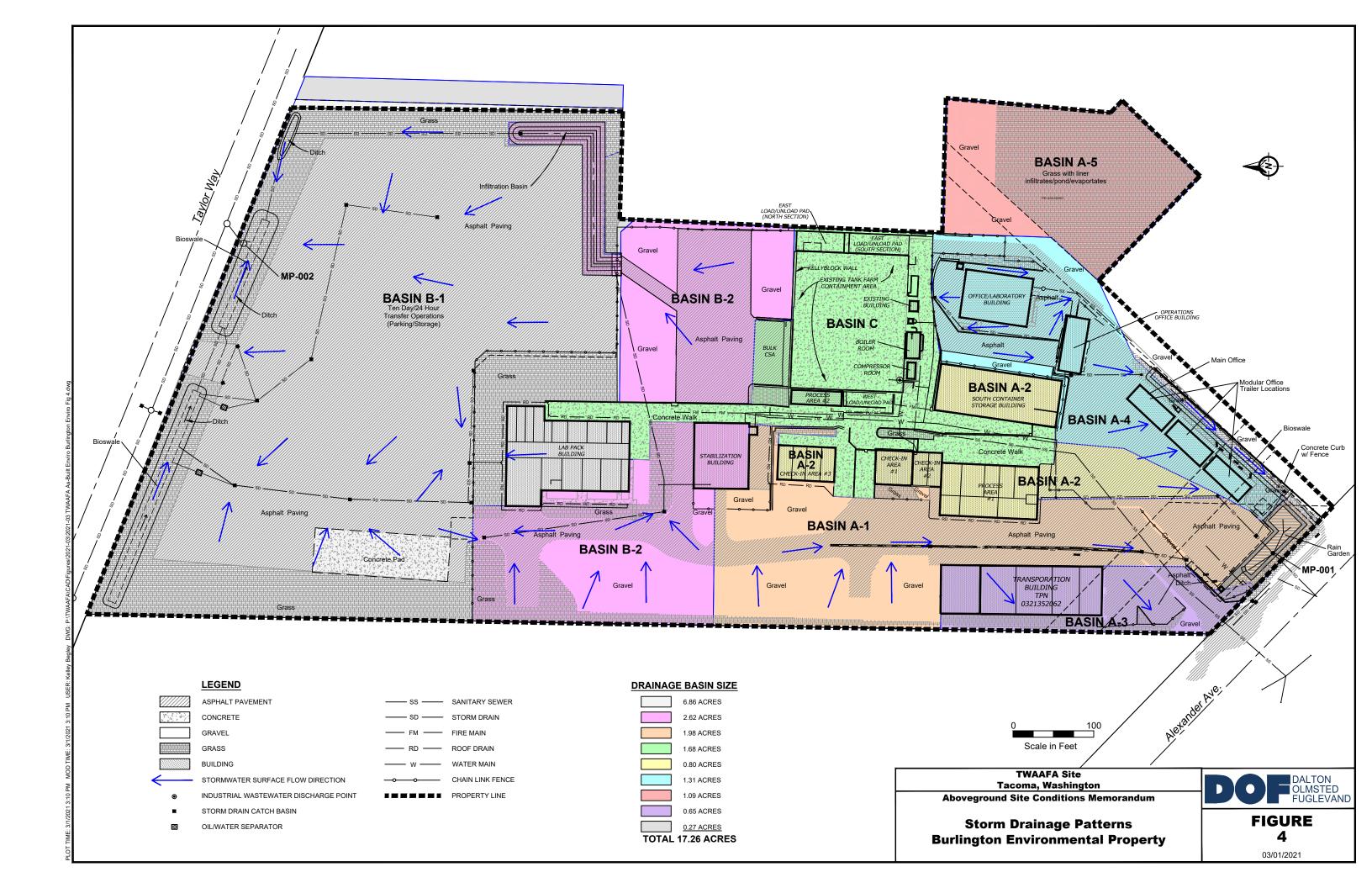
Dalton, Olmsted, & Fuglevand, Inc. (DOF), 2020. Final Data Gaps Work Plan. July.

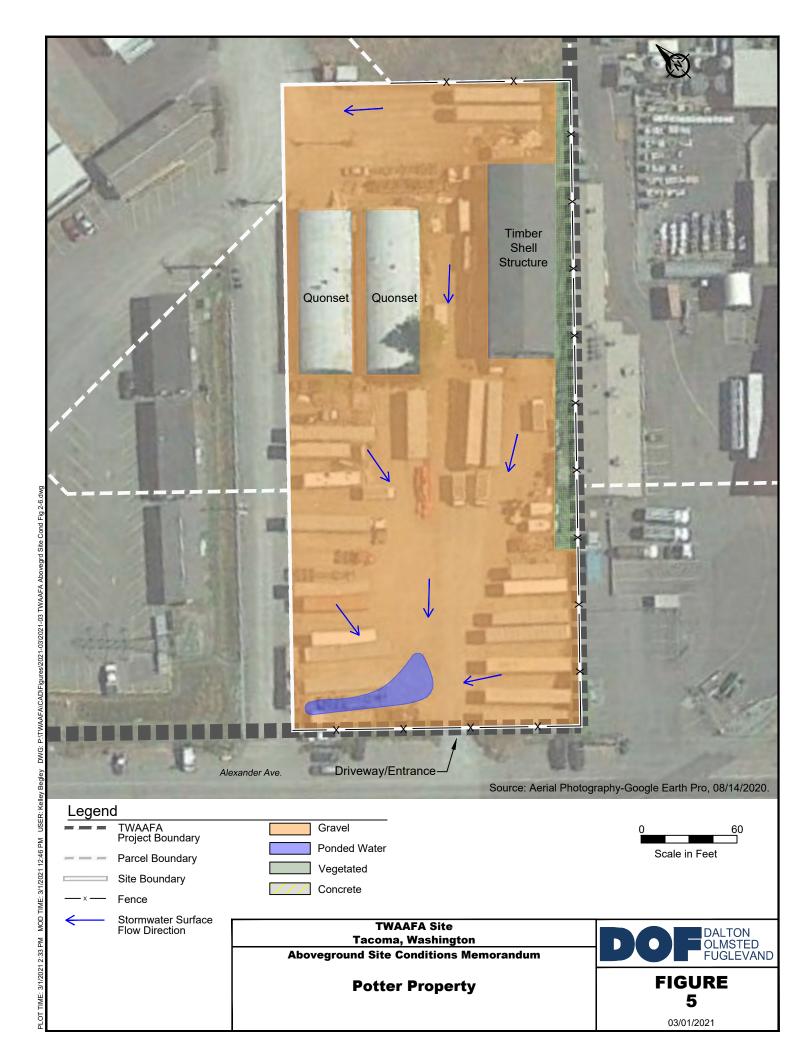
Figures

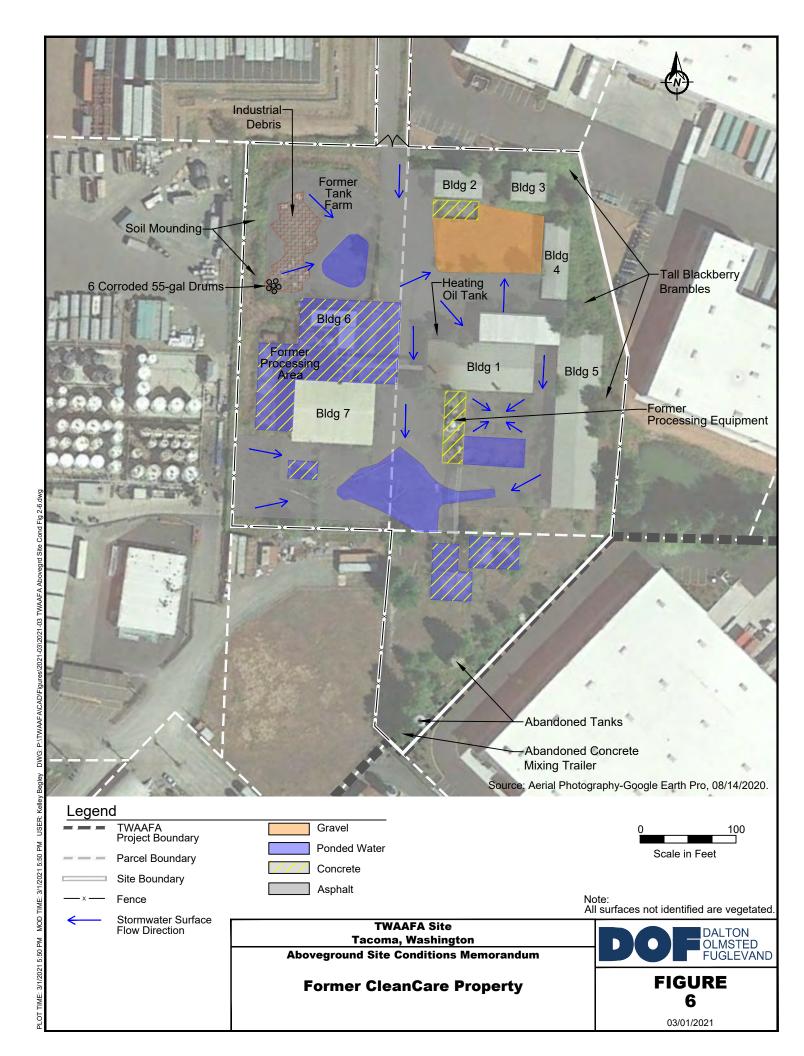


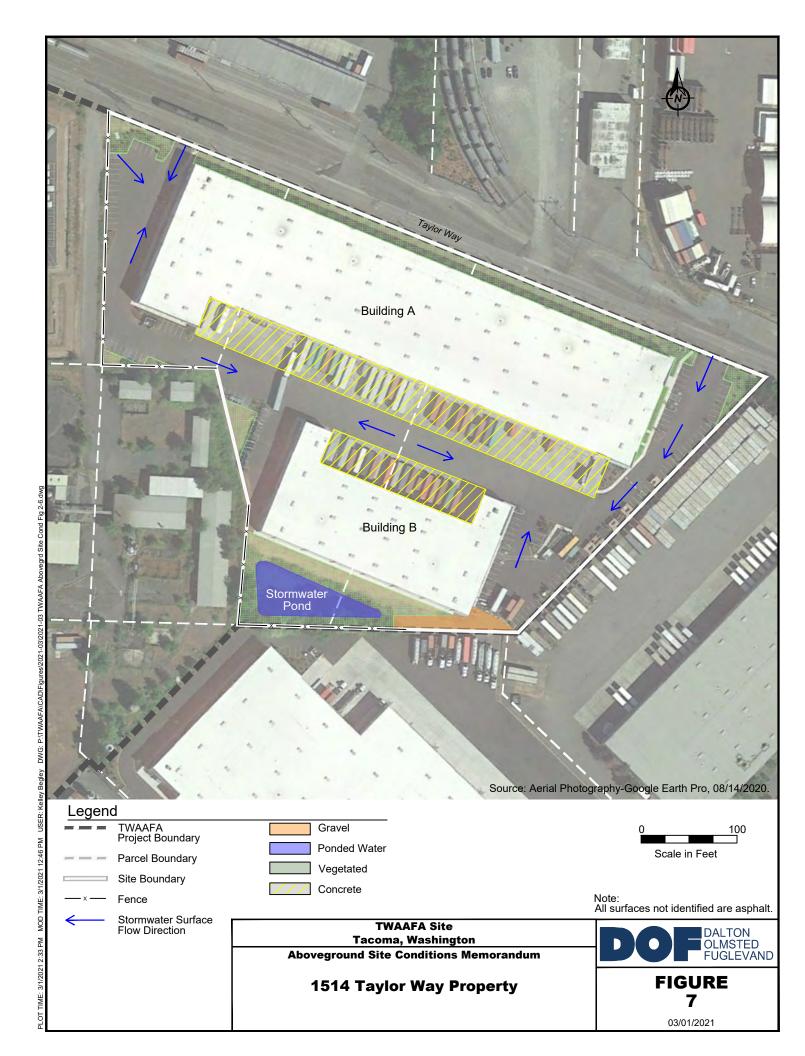


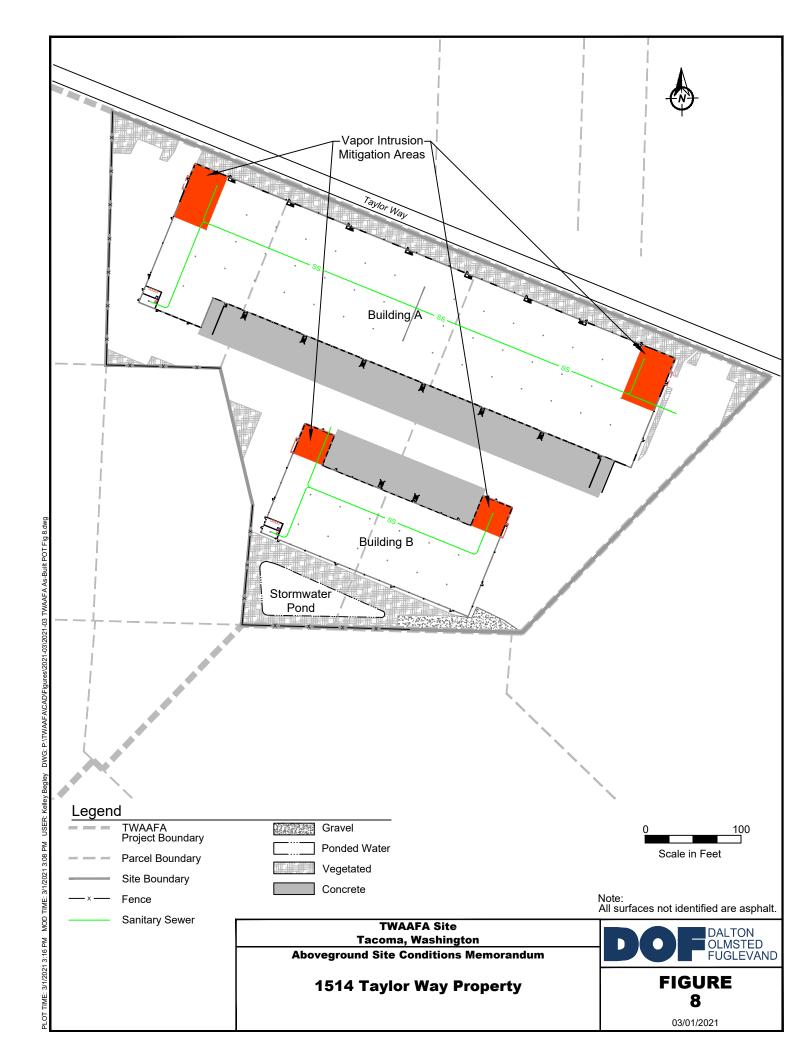












Appendix A Photo Log



Picture 1 Parking Area along Taylor Way on 1205 Alexander Ave & 1300 Taylor Way Property



Picture 2 Elevated roadway on 1250 Alexander Ave & 1300 Taylor Way Property





Picture 3 Ponding in southeast corner on 1205 Alexander Ave & 1300 Taylor Way Property



Picture 4 Slope and Ponding on east side of 1205 Alexander Ave & 1300 Taylor Way Property





Picture 5 Debris in eastern slope on 1205 Alexander Ave & 1300 Taylor Way Property



Picture 6 Ditch on west side of 1205 Alexander Ave & 1300 Taylor Way Property





Picture 7 Eastern Taylor Way stormwater swale on Burlington Environmental Property



Picture 8 Western Taylor Way stormwater swale on Burlington Environmental Property





Picture 9 Ponded stormwater along eastern property line, adjacent to northern trailer parking lot on Burlington Environmental Property



Picture 10 Office building (right) nearest tank farm on Burlington Environmental Property





Picture 11 Parcel A on Burlington Environmental Property



Picture 12 Quonset buildings in foreground and timber shell structure in background on Potter Property.





Picture 13 Timber shell structure on Potter Property (looking north)



Picture 14 Ponded water and trailer parking on south end of Potter Property





Picture 15 Brush north of building 2 on CleanCare Property



Picture 16 Brush around buildings at northeast corner of CleanCare Property (Building 3 on left)





Picture 17 Abandoned tanks on south end of CleanCare Property



Picture 18 Ponded water and debris in the former tank farm area of the CleanCare Property





Picture 19 Soil mounding along western property line, west of the former tank farm area on the CleanCare Property



Picture 20 Corroded drums in southwest corner of former tank farm area on CleanCare Property





Picture 21 Debris in the former tank farm area of the CleanCare Property



Picture 22 Concrete containment area south of building 2 (left) and abandoned process equipment between buildings 2 and 3 on CleanCare Property





Picture 23 Gravel area south of building 2, former tank farm area in background on CleanCare Property



Picture 24 Abandoned fiberglass tanks inside building 2 on CleanCare Property





Picture 25 Debris inside and outside south end of building 3 on CleanCare Property

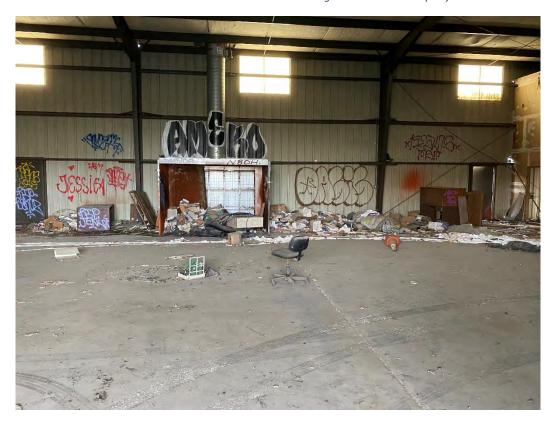


Picture 26 Building 5 with large trailer in background, inside the building on CleanCare Property





Picture 27 Debris and vandalism inside building 1 on CleanCare Property.



Picture 28 Debris and vandalism inside building 1 on CleanCare Property





Picture 29 Heating oil tank inside fence on north side of building 1, abandoned process equipment in background with ponded stormwater on CleanCare Property

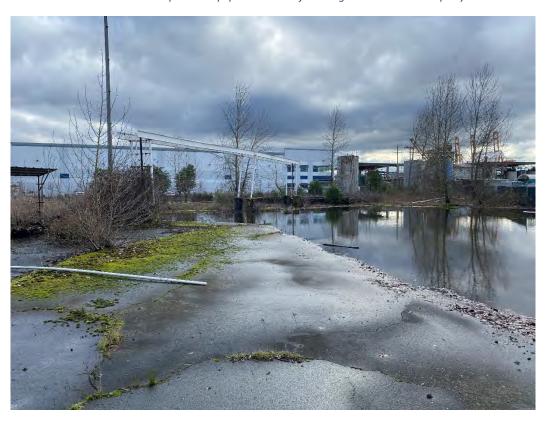


Picture 30 Ponded stormwater and former processing pipe rack overhead on CleanCare Property





Picture 31 Former process equipment south of building 1 on CleanCare Property



Picture 32 Ponded stormwater southwest of building 1, abandoned tanks in background on CleanCare Property





Picture 33 Former concrete containment area south of building 1 full of stormwater on CleanCare Property



Picture 34 Abandoned totes in building 5 on CleanCare Property





Picture 35 Asphalt depression south of building 1 and north of containment area shown in Picture 34 on Cleancare Property



Picture 36 Ponded stormwater in concrete containment area south of former process area on CleanCare Property, Burlington
Environmental tank farm in background





Picture 37 Former process area (containment and abandoned equipment) with ponded stormwater on CleanCare Property

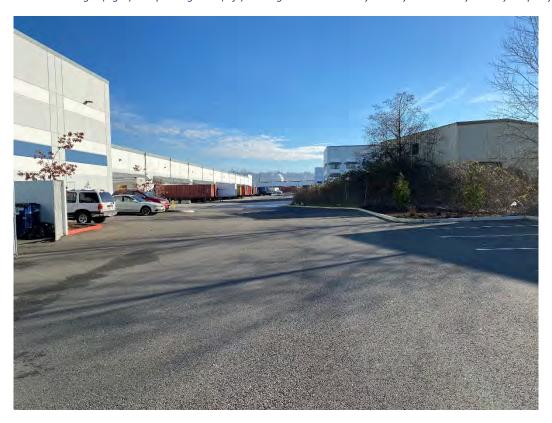


Picture 38 Containment area with stormwater southwest of building 5 on CleanCare Property





Picture 39 Building A (right) and parking area (left) looking north toward Taylor Way on 1514 Taylor Way Property



Picture 40 Building A (left) and building B (right) looking east on 1514 Taylor Way Property





Picture 41 Looking west from 1514 Taylor Way Property toward CleanCare Property, building 3 in background, fencing missing



Picture 42 Stormwater pond at south end of 1514 Taylor Way Property

