



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 19, 2021

John Hildenbrand  
Robinson Noble, Inc.  
2105 South C Street  
Tacoma, WA 98402

**Re: Final Remedial Investigation/Cleanup Action Plan- Department of Ecology Comments**

- **Site Name:** Flying J Travel Plaza
- **Site Address:** 1501 33<sup>rd</sup> Avenue E, Fife, WA-Pierce County
- **Facility Site ID No.:** 94359448
- **Cleanup Site ID No:** 6909

Dear John Hildenbrand:

In response to your request, I am restating my substantive comments on your Final Remedial Investigation/Cleanup Action Plan draft for the Flying J Travel Plaza site. I concur with your choice of groundwater Model Remedy 4 for petroleum contaminated sites for this site.

In your description of the preparation of an environmental covenant for the site, several steps were omitted:

- a) I request that you prepare a draft covenant using the Ecology template. Note that areas highlighted in yellow are negotiable between your client and Ecology. Changes to areas in white may require review by the Attorney General's office. Note that the area of soil restrictions needs to cover all areas where the contamination exceeds MTCA Method A plus a margin of safety but does not need to include all of a parcel. Note that the inspection and monitoring plan is a separate document, not part of the covenant.
- b) I will review the draft. If I concur with it, I will ask you to submit a copy to the City of Fife zoning department for their review and comments.
- c) I will then prepare a draft opinion letter, including both the draft covenant and the draft inspection and monitoring plan, and submit it to the peer reviewer.
- d) If the peer reviewer concurs with the draft letter, I will request you to prepare a final copy of the covenant, have it signed by your principal, and mail it to Ecology.

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- e) I will have Ecology management sign the covenant, then mail the dual-signed copy to you for recording.
- f) Once recorded, I will request you to mail to me either the original copy of the covenant, if the Auditor's office will allow this, or, if not, a copy of the front page of the recorded covenant showing the recorder's stamp.

Once I receive one of the two items in (f), if your site data in Ecology's EIMS database has been verified, the opinion letter will be mailed.

Thank you for working with Ecology. If you have any further questions or comments please feel free to contact me at [christopher.maurer@ecy.wa.gov](mailto:christopher.maurer@ecy.wa.gov) or at 360-407-7223.

Sincerely,



Christopher Maurer, P.E.  
Toxics Cleanup Program