STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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Electronic Copy

August 16, 2021

Eric Hoolahan
Bellevue Rare Coins
321 Bellevue Way NE
Bellevue, WA 98004
eric@bellevuerarecoins.com

Re: Rescission of No Further Action (NFA) Status for the following Site:

- **Site Name:** Fred Roberson Property
- **Site Address:** 2302 Pacific Ave, Tacoma, Pierce County, WA 98409
- **Facility/Site ID:** 55732663
- **Cleanup Site ID:** 6288
- **VCP Project No.:** SW0053

Dear Eric Hoolahan:

The Department of Ecology (Ecology) issued a No Further Action (NFA) determination for the Fred Roberson Property (Site) on August 12, 1998. Subsequent 2020 and 2021 groundwater monitoring reports, and the *Proposal for Supplemental Vapor Intrusion Assessment*,[1] completed by Atlas Geosciences NW, provided additional information that significant contamination remains at this Site. Based on these findings, Ecology is rescinding the August 12, 1998, NFA determination.

Contamination was identified at concentrations greater than Model Toxics Control Act (MTCA) Method A cleanup levels for the following constituents:

- Gasoline-range petroleum hydrocarbons (TPH-G), benzene, and toluene in groundwater and potentially into the air.

Ecology reviewed the groundwater data collected during 2020 and the *Proposed Vapor Intrusion Assessment* and has the following comments:

1. TPH-G, benzene, and toluene groundwater concentrations all exceeded MTCA Method A Groundwater Cleanup Levels during the most recent (fourth quarter 2020) groundwater monitoring event (Atlas 2021a).[2] Each of these constituents showed a significant increase during this quarter compared to past quarters.

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[1] https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=6288

[2] *Fourth Quarter Groundwater Monitoring Event Report, Fred Roberson Building, 2302 Pacific Avenue, Tacoma, Washington.* Prepared by Atlas Geosciences NW (Atlas), February 4, 2021 (2021a).

TPH-G and benzene also exceeded MTCA Method A Cleanup Levels during the preceding three quarters. Of particular concern are the benzene groundwater concentrations; these concentrations ranged from 230 to 980 micrograms per liter (µg/L). The MTCA Method A Cleanup Level for benzene is 5 µg/L.

2. Groundwater elevation contour maps shown in all four quarterly groundwater monitoring reports (Atlas 2020a, b, c; 2021a) show well MW-2 as located in the downgradient flow direction.[3] The Ecology calculated flow direction[4] based on data from the three groundwater monitoring wells for these events shows that well MW-2 is located cross-gradient and the actual flow direction is southeast, where no monitoring wells are located.

   Therefore, the extent of off-property groundwater contamination is not defined. Additional groundwater monitoring wells are needed in the downgradient direction to define the extent of contamination. If confined or semi-confined conditions are encountered during future well installation, care should be taken to avoid screening across confining layers.

3. During the installation of monitoring wells MW-1 through MW-3, groundwater was initially encountered at a depth of approximately 19 feet below ground surface (bgs), but then rose to depths ranging from 4.2 to 6 feet bgs, indicating a semi-confined condition (Atlas 2020a). All three monitoring wells were completed with a screened interval and associated sand pack that extends from the total depth of 24 feet bgs up to a depth of 4 feet bgs.

   When the two 570-gallon gasoline underground storage tanks (USTs) were removed in 1998, groundwater was reportedly not encountered to the maximum excavation depth of 13.5 feet bgs (Atlas 2020a). Well MW-1 is located a short distance east of the former location of the USTs. Field boring log descriptions and soil sample results from well MW-1 (installed January 2020) suggest that petroleum contamination is present from approximately 4 feet bgs to 22 feet bgs. Review of quarterly groundwater monitoring results show that the highest concentrations of petroleum hydrocarbons occur in the winter months (December and February). These are also the months with the highest measured groundwater elevation. This suggests that the increase in petroleum hydrocarbons concentrations in well MW-1 in the winter months is from contact with shallow soil contamination.

4. As shown on Figure 2, Site and Exploration Plan in Atlas (2021a), there are utility lines (fiber optic data line and buried electrical) near well MW-1 that could act as preferential pathways for shallow groundwater flow. The potential for preferential pathways to act as conduits for groundwater contamination and vapor intrusion should be investigated.

5. Contaminated groundwater from the property could extend beneath the adjacent building to the south (Foster's Furniture, 2306 Pacific Avenue). The potential for this should be investigated through the collection of groundwater samples in the sidewalk on the east side of the Foster's Furniture Building, south of MW-1. Sub-slab soil gas and indoor samples should also be collected from the

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[3] *Subsurface Soil and Groundwater Assessment, Fred Roberson Building, 2302 Pacific Avenue, Tacoma, Washington.* Prepared by Atlas, March 9, 2020 (2020a); *Second Quarter Groundwater Monitoring Event Report, Fred Roberson Building, 2302 Pacific Avenue, Tacoma, Washington.* Prepared by Atlas, August 4, 2020 (2020b); and, *Third Quarter Groundwater Monitoring Event Report, Fred Roberson Building, 2302 Pacific Avenue, Tacoma, Washington.* Prepared by Atlas, December 24, 2020 (2020c).

[4] Flow direction was calculated using the "three point problem" method. For an description of this method, see: https://waterwelljournal.com/field-notes-2/.

building if access is granted by the property owner. If access cannot be obtained for these samples then near-slab soil gas samples could also be collected from the sidewalk south of MW-1, near the location of the groundwater samples.

6. A revised vapor intrusion (VI) work plan was recently submitted to Ecology for review (Atlas 2021b).[5] This plan was revised in response to comments from Ecology (2020)[6] on an earlier version of the VI work plan (Atlas 2020d).[7] **Additional revisions need to be made to the VI work plan to address the following comments:**

   a. As mentioned above, sub-slab soil gas and indoor samples should also be collected from the Foster's Furniture Building if access is granted by the property owner. If access cannot be granted for these samples, then near-slab (within 10 feet horizontally of the foundation) soil gas samples should be collected from the sidewalk south of MW-1. As stated in Ecology's 2009 draft vapor intrusion guidance,[8] due to the possibility of diluting the collected soil gas with atmospheric air, soil gas and/or near-slab samples should not be collected from depths shallower than five feet bgs (or less than two to five feet below the depth of the foundation unless they are sub-slab samples).

   b. Ecology recommends that you measure and report differential and barometric pressures beneath the slab and inside the buildings, to determine if the pressure beneath the slab can be greater than indoor air. A pressure gradient from sub-slab to indoor air could result in sub-slab soil vapor migrating into the indoor air space through advection. Differential pressures should be measured using a micro-manometer that is auto-zeroing and has a pressure differential sensitivity to 0.001 inches of water. Differential pressures should be recorded using a data logger for at least 48 hours (preferably one week) prior to sampling to assess fluctuations (if any) of cross-slab differential pressure. Ecology recommends completing VI assessment work during late fall or winter months.

   c. The method of sub-slab probe installation does not appear to follow standard operating procedures (SOPs) for sub-slab sampling. There are several published procedures for sub-slab probe installation; these include ITRC (2021),[9] EPA (2006),[10] NJDEP (2013),[11] and EPRI (2005).[12] Please revise your installation procedure to be consistent with standard SOPs.

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[5] *Proposal for Supplemental Vapor Intrusion Assessment, Fred Roberson Building, 2302 Pacific Avenue, Tacoma, Washington*. Prepared by Atlas Geosciences NW, May 14, 2021 (2021b).

[6] *Re: Roberson Building VI Assessment Plan – Revised*. Email from Steve Teel, Ecology, to Lannie Smith, Atlas, January 22, 2020.

[7] *Proposal for Supplemental Vapor Intrusion Assessment, Fred Roberson Building, 2302 Pacific Avenue, Tacoma, Washington*. Prepared by Atlas Geosciences NW, January 20, 2020 (2020d).

[8] *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action.* Washington State Department of Ecology, Toxics Cleanup Program, Publication No. 09-09-047, October 2009 Review Draft.

[9] *Appendix G, Investigation Methods and Analysis Toolbox*; in: *Petroleum Vapor Intrusion, Fundamentals of Screening, Investigation, and Management*. Interstate Technology Regulatory Council (ITRC). Online document available at: https://itrcweb.org/PetroleumVI-Guidance/

[10] *Assessment of Vapor Intrusion in Homes near the Raymark Superfund Site Using Basement and Sub-Slab Air Samples*. EPA/600/R-05/147, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Cincinnati, OH, March 2006.

[11] *Vapor Intrusion Technical Guidance*, New Jersey Department of Environmental Protection (NJDEP), Site Remediation Program, March 2013 (version 3.1).

[12] *Reference Handbook for Site-Specific Assessment of Subsurface Vapor Intrusion to Indoor Air*. Report 1008492. Electric Power Research Institute, Inc. (EPRI), Palo Alto, CA.

d. An appropriate equilibration time needs to be observed when collecting sub-slab and soil gas samples. The necessary equilibration time depend on the type of sample probe and installation method that is used. Please consult Ecology for questions about the appropriate equilibration time. For example, EPA (2006) has recommended a 2-hour equilibration time for sub-slab probes. Please observe a 2-hour equilibration time, prior to sampling, following sub-slab sample point installation.

Based on this information and the October 8, 2019, email (Enclosure A), Ecology rescinds the August 12, 1998, NFA determination under Voluntary Cleanup Program (VCP) project SW0053. The effective date of the rescission is the date of this letter.

Next Steps

Ecology will update its records to reflect that Ecology has rescinded the NFA determination for this Site. The Site will be listed in future publications of the Confirmed and Suspected Contaminated Sites List.[13]

If you have any questions about the rescission or you are interested in re-entering this Site into the VCP, please contact the Southwest Regional Office Toxics Cleanup Program VCP Coordinator, Nick Acklam, at (360) 407-6347 or nicholas.acklam@ecy.wa.gov.

Sincerely,

Rebecca S. Lawson, P.E., LHG
Section Manager
Toxics Cleanup Program
Southwest Regional Office

RSL/tm

Enclosure: A – October 9, 2019, Email

cc by email: Lannie Smith, Atlas Geosciences NW, lsmith@atlasgeonw.com
Rob Olsen, TPCHD, ROlsen@tpchd.org
Panjini Balaraju, Ecology, panjini.balaraju@ecy.wa.gov
Nick Acklam, Ecology, nicholas.acklam@ecy.wa.gov
Ecology Site File

[13] https://apps.ecology.wa.gov/tcpwebreporting/reports/cleanup/contaminated

Enclosure A

October 9, 2019, Email

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From: Lannie Smith
To: Balaraju, Panjini (ECY)
Cc: Eric Hoolahan; Acklam, Nicholas (ECY); Teel, Steve (ECY)
Subject: RE: Fred Roberson Property/Building
Date: Tuesday, October 8, 2019 2:24:22 PM
Attachments: image004.png
image003.png

Hello Panjini:
Thanks for the call today. I spoke with Eric Hoolahan and we are going to move forward with the soil and groundwater investigation and, in the meantime, draw up a revised vapor intrusion investigation work plan for your review and concurrence (I think we previously put the earlier plan on the back burner pending the results of the sub-slab venting interim action and sampling). Lastly, I wanted to get the three options you and I discussed for the site down on paper, to make sure we are all on the same page. The three Ecology-mandated scenarios we discussed are:

- Do the pre-approved soil and groundwater assessment as well as a vapor intrusion (VI) assessment that includes indoor air sampling. If groundwater is contaminated and/or if the VI assessment concludes that vapor intrusion is contaminating indoor air at the site, the NFA will be rescinded and future NFA pursuits are recommended to go through PLIA.
- If the above work is performed and groundwater and indoor air are not being impacted, the NFA will remain in place with periodic reviews.
- The client can choose to do nothing, at which point the NFA would be rescinded.

If there are any other considerations or information that my client needs, please feel free to respond accordingly. We are moving forward with the right-of-way permitting process and I will keep you updated as things proceed.
Thanks!
Lannie Smith, CHMM
President, Principal Environmental Scientist
P.O. Box 1009, Sumner, WA 98390
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lsmith@atlasgeonw.com
www.atlasgeonw.com

From: Balaraju, Panjini (ECY)
Sent: Monday, October 7, 2019 8:32 AM
To: Lannie Smith
Cc: Eric Hoolahan ; Acklam, Nicholas (ECY) ; Teel, Steve (ECY)
Subject: RE: Fred Roberson Property/Building

Good morning Lannie,
Here internally there are few administrative changes/transitions are happening regarding handling of sites. Please don't do any work. I would like to have a conference call/meeting with you and Eric Hoolahan (property owner) to discuss about this. I will call and talk to you

tomorrow.
Thanks.
Panjini Balaraju

From: Lannie Smith <lsmith@atlasgeonw.com>
Sent: Thursday, October 3, 2019 5:07 PM
To: Balaraju, Panjini (ECY) <PBAL461@ECY.WA.GOV>
Cc: Eric Hoolahan <Eric@BellevueRareCoins.com>; Teel, Steve (ECY) <stee461@ECY.WA.GOV>; Blayne Hartman <blayne@hartmaneg.com>
Subject: RE: Fred Roberson Property/Building

Hello Panjini:

Thank you again for speaking with me today. Following up on our conversation this morning, and since I was driving at the time, I wanted to summarize the talking points:

- Understanding that the groundwater assessment preparations are underway, we will provide you with weekly updates and you indicated you will allow us the 8 to 10 weeks needed to complete the scope of work (thank you very much for that).
- You mentioned that you would like to have a conference call to revisit the vapor assessment scope of work for the site building. I am cc'ing Blayne Hartman here, since he has been providing technical support on the vapor issue and we have been relying heavily on his expertise. Between Blayne and myself, we both have availability next week on Tuesday and Friday (I might also be able to do some rearranging of schedule if you wanted to do the call on Thursday). Would any of those days work for you and Steve for a phone call?

Thanks!
Lannie

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From: Lannie Smith
Sent: Wednesday, October 2, 2019 8:17 PM
To: Balaraju, Panjini (ECY) <PBAL461@ECY.WA.GOV>
Cc: Eric Hoolahan <Eric@BellevueRareCoins.com>; Teel, Steve (ECY) <stee461@ECY.WA.GOV>
Subject: RE: Fred Roberson Property/Building

Hello Panjini:

Thank you for checking in. There has been no action taken yet on the groundwater assessment, but the client just signed our contract for that scope of work and we will move forward with it right away. The time needed to complete the permitting process with the City will likely not allow for completion of the groundwater assessment by October 31st. If we can keep you updated on a

weekly basis, would you be amenable to pushing the due date into December (the turnaround time estimated in our scope of work was 8 to 10 weeks)? I understand that this is a late start but, with the contract now signed, the client has committed to getting this done and work has begun. I will call you in the morning to discuss.
Thanks!
Lannie

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From: Balaraju, Panjini (ECY) <PBAL461@ECY.WA.GOV>
Sent: Monday, September 30, 2019 9:14 AM
To: Lannie Smith <lsmith@atlasgeonw.com>
Cc: Eric Hoolahan <Eric@BellevueRareCoins.com>; Teel, Steve (ECY) <stee461@ECY.WA.GOV>; Balaraju, Panjini (ECY) <PBAL461@ECY.WA.GOV>
Subject: RE: Fred Roberson Property/Building

Good morning Lannie,

I hope everything is going okay. Per your e-mail below, I presume that the monitoring wells have already been installed and sampled in February 2019 and the vent pipe has been installed. If by chance, this work has not been completed yet, this must be completed by the end of October 31, 2019, if not Ecology will consider the site is not protective of human health and the environment and will withdraw the no further action letter. In addition, we need a schedule for the vapor sampling (sub-slab, indoor air and ambient air, we can discuss the details).

If you have any questions, please call me at (360) 407-6335.

Panjini Balaraju

From: Lannie Smith <lsmith@atlasgeonw.com>
Sent: Thursday, December 27, 2018 12:10 PM
To: Balaraju, Panjini (ECY) <PBAL461@ECY.WA.GOV>
Cc: Eric Hoolahan <Eric@BellevueRareCoins.com>
Subject: RE: Fred Roberson Property/Building

Hello Panjini:

I have been keeping in touch with the client regarding this project and just spoke with them again today. They have the groundwater proposal in hand but, because of their schedule, have needed to focus on getting the store up and running before proceeding with our work. They have been talking to contractors about installing the vent pipe but were having difficulty finding one willing to do the work (too unusual a request, apparently). Consequently, not much has been done yet.

From our conversation today, their intent is to move forward with everything after the New Year. They found a contractor to install the vent pipe. My understanding is the plan is to tackle that first. In the meantime, the permitting for the monitoring wells will be started, which would mean sampling would occur in February.

One notable piece of news since you and I last talked, we had a logistical issue arise from the driller, in that they indicated there is not enough ceiling height in the building patio area to use the drill rig they need for the site (they need their large probe rig to get to the depths we need and the ceiling is about 6-12 inches too low). Consequently, we scoped the boring to be place in the sidewalk, a few feet east (downgradient) of the patio. This will still be in the area where contamination was left in place and it may provide us more insight into the magnitude of the soil contamination still remaining beneath the sidewalk. It is going to cost the client more money, because we have to deal with the City's excessive sidewalk ROW requirements, but there was no other way to ensure the well gets installed properly. I recall that was the only deviation in the scope from what you and I discussed.

I did get preliminary approval from City of Tacoma on the proposed well locations, so things should move forward smoothly on that front once we get started. I will follow up with you after the New Year once we get the go ahead from the client and keep you updated as things proceed.

Happy Holidays!

Lannie

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President, Principal Environmental Scientist

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From: Balaraju, Panjini (ECY)
Sent: Thursday, December 27, 2018 9:10 AM
To: Lannie Smith
Subject: Fred Roberson Property/Building

Good morning Lannie,

Please send me updates on this site. Did you install the groundwater monitoring wells? Send me updates on the soil-vapor issues?

Thanks.

Panjini Balaraju