CERTIFIED MAIL

February 28, 2007

Mr. Thomas Morin
Environmental Partners, Inc.
295 NE Gilman Blvd, Ste 201
Issaquah, WA 98027

Re: Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site:

- Name: Safeway #1436
- Address: 7201 East Portland Avenue, Tacoma, Washington.
- Facility/Site No.: 1355
- VCP No.: SW 0414

Dear Mr. Morin:

Thank you for submitting your work plan report for the Safeway #1436 facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Quarterly Status Report, Second and Third Quarters 1995, dated September 27, 1995 by SECOR.
2. Phase I Environmental Site Assessment, dated February 11, 2000 by Environmental Partners, Inc.
3. Phase II Environmental Site Assessment Letter Report, dated November 2, 2000 by Environmental Partners, Inc.
4. Exposure Assessment for Petroleum Contaminated Soil, dated January 21, 2002 by Argus Pacific.
5. UST Removal and Interim Remedial Measures Report, dated May 7, 2002 by Environmental Partners, Inc.
6. Petroleum Assessment Work Plan, dated April 20, 2006, by Environmental Partners, Inc.
7. Project files including the VCP application, dated May 22, 2002.

The documents listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact at 360-407-6365.

The Site is defined by the extent of contamination caused by the following release(s):

- Gasoline and BTEX in Soil, Ground Water.

The Site is described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site are not sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing any of the contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at the Site under MTCA.

The following are Ecology's comments pertaining to reviewed material:

1. Our records indicate that you have not met the substantive requirements of MTCA during site activities. The Site has not been defined as required by WAC 173-340-350 (7) – MTCA Cleanup Regulation Amended February 12, 2001. Please furnish sampling results to show distribution of hazardous substances. This requirement pertains

particularly to areas outside property boundaries, but affected by the release, i.e. areas in the north and west direction from current Safeway Fueling operations.

2. The site had not been characterized and cleaned up prior to February 12, 2001. Based on the above, you have not fully characterized/remediated the site in accordance with the pre-2001 regulations. You are therefore required to comply with current standards, as stipulated in MTCA Cleanup Regulation WAC 173-340-702 (12) (b) and (c). The MTCA Method A cleanup levels for the previous and current regulations are presented in the following table:

	MTCA Version	Benzene	Toluene	Ethylbenzene	Xylenes	TPH (with Benzene present) (gasoline/diesel/other)
Soil mg/kg	Pre-2001	0.5	40	20	20	100/200/200
	Current	0.03	7	6	9	30/2000/2000
Groundwater ug/l	Pre-2001	5	40	30	20	1,000
	Current	5	1,000	700	1,000	800/500/500

Note: This table illustrates approximate, generalized values, and reflects the difference in cleanup levels. For full information please refer to regulations.

According to MTCA Cleanup Regulation Amended February 12, 2001, testing and compliance with Table 830-1 (WAC 173-340-900) is necessary. For example: testing may be required for Ethylene Dibromide (EDB), Methyl Tertiary-Butyl Ether (MTBE), and 1,2 Dichloroethane (EDC). Please refer to the MTCA regulations for more detailed description of the requirements.

3. Please indicate the area of soil and ground water affected by the contamination. Provide cross section(s) figure indicating all pertinent data including groundwater level, all borings, wells, soil strata, plumes of contamination (if any) in media, points of release, etc.

4. The previous explorations did not encounter ground water at depths reaching 13 feet below the ground (bgs). As Environmental Partners, Inc. (EPI) indicated the previous winter was dry and they could not expect encountering perched ground water. I am concerned that with anticipated drilling time going possibly into June, a chance of finding the ground water is not too good. Please consider a season where the chance of encountering wet condition in the subsurface is greater.

5. Gas and BTEX are the contaminants of concern. The current work plan indicates soil borings will extend to a depth of 15 ft bgs, based on previous explorations. In case that contaminants are found at depths close to 15 ft bgs, please extend borings to depths at which clean soils (based on PID readings) or groundwater are encountered.

6. The work plan indicates soil boring locations are greater than 30 ft outside the source area of contamination previously identified in 2002 explorations. Because soils in this source area exceeded Method A MTCA Cleanup Levels Ecology is concerned that there is an uninvestigated zone where there is a potential contamination. Ecology suggests confirmatory sampling in the source area in all appropriate media.

7. Please consider the placement of ground water monitoring wells to demonstrate that the plume has not reached any of the aquifer layers (perched or otherwise) and that the potential plume is fully characterized both horizontally and vertically. Monitoring wells need to be considered beyond the property boundary. Ecology has met with the City of Tacoma concerning permit requirement for placement of monitoring wells in road right-of-ways. Soil boring and temporary monitoring wells may not require a permit. Please work with the City of Tacoma to ensure the wells can be placed in appropriate locations.

8. Please demonstrate that there is no soil contamination under existing structures.

9. Please submit all documentation regarding 1990's NFA determination.

10. Regarding the February 1996 one sample taken by geoprobe, please provide information how a determination of no impact could be reached. Please consider testing the area using more points of sampling.

11. A conclusion from EPI Phase II ESA refers to spillage. Please elaborate on possible subsurface releases from sources like tanks, piping, etc.

12. The site is still most likely affected by the releases, while the property may be in compliance with the old, pre-2001 regulations. Please discuss the applicability of compliance to the whole site, rather than to parts of the property. Please refer to comment 2.

The following comments were made in response to the work plan by Rob Olsen, Environmental Health Specialist with Tacoma Pierce County Health Department (TPCHD) on June 12, 2006:

1. Groundwater investigations from Texaco Station #63-232-1425, west of the subject site on Portland Ave., shows groundwater between four and eight feet below ground surface flowing primarily towards the northeast. *The proposed boring/temporary well locations would not adequately characterize a groundwater contaminant plume flowing towards the northeast.*
2. The TPCHD concurs with the proposed soil-boring locations and analysis, though groundwater information, if obtained, may need to be supplemented by data collected from an array of wells both up-gradient and to the east of the former UST release.

All sampling data shall be submitted to Ecology according to the requirements of WAC 173-340-840(5), in printed form and in electronic form capable of being transferred into the department's data management system. Electronic data submittal requirements are provided at http://www.ecy.wa.gov/eim/.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or performed at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 360-407-6363.

Sincerely,

Marcel Szyszkowski, PE
SWRO Toxics Cleanup Program

[AUTHOR INITITALS]: [SECRETARY INITIALS]
Cc:

Shane Erickson, Safeway
David Letterman, City of Tacoma
Rob Olsen, TPCHD
Bob Warren - Ecology
Paul Turner - Ecology

ENCLOSURE A

The subject property is located at 1624 72nd Street East in Tacoma, WA, Pierce County. The alternate site address is 7201 Portland Avenue, Tacoma, WA. The property, approximately 4.43 acres in size, is located in a commercial and residential area of Tacoma, WA. Safeway is listed as

the property taxpayer at the Pierce County Assessor's Office and the subject property is occupied by Safeway Store No. 1436, fueling system facility, convenience store and associated paved parking area. The property is accessible from 72nd Street East and Portland Avenue East.

The site is also known as E.J. Rody & Sons, Kim Nursery, Chevron, My Uncle Store, and Safeway (occupant of the property), a designated UST site according to Environmental Data Registry (EDR) Radius Map Report. From at least 1953 to 1992 the property was occupied by an excavation contracting business and diesel truck repair business. Following extensive remedial action, the subject property was granted a "No Further Action" status by Ecology. No record of such action was however found in the files available to this Site manager.

A review of the United States Geological Survey (USGS) 7.5' Topographic Map known as the Tacoma, Washington Quadrangle map (1991) indicated the subject property is relatively flat; however, the regional slope would appear to be east or northeast toward the Puyallup River. During the site visit, the slope of the paved surface in the area of the subject property appeared to be in a southerly or southwesterly direction.

According to a Soil Survey of Pierce County published by the Soil Conservation Service and the United States Department of Agriculture (1979), the subject property is underlain by a gravelly loam. The classification of deeper soils is unknown.

The depth to ground water may be approximately 30 to 35 feet with perched ground water in "sand stringers" throughout the site, according to past reports. Shallow ground water is expected to follow regional topographic trends and flow to the east or northeast toward Swan Creek and the Puyallup River.

Storm water is expected to flow on to the subject property from the north. In addition, no sources of storm water run-off from the subject property to adjacent properties are evident. However, storm water is expected to be captured by storm drains observed on the subject property.

Current Facility Description

A single one-story Safeway grocery store is located on the southern portion of the subject property containing approximately 53,377 square feet according the Pierce County Assessor's Office, and was constructed in 1994. The building does not have a basement and is slab-on-grade construction. A Safeway gas station (convenience store and fueling canopy) is located on the northwest portion of the property.

The utilities present at the property include electricity, natural gas, public water, and public sewer. The Safeway facility also contains a natural gas-powered emergency generator that is used for back-up power.

Exterior features present outside of the building on the subject property include paved, asphalt

parking lots, storm drains in the parking lot, landscaped areas, and a trash compactor in the loading area.

According to personnel interviewed by Environmental Partners, Inc. (EPI) and site plans dated July 1994 obtained from the Pierce County Department of Planning and Development Services, storm water is collected in two detention tanks (concrete) located under the truck loading area east of the Safeway building. The water is discharged from these tanks to the Pierce County storm water system via automatic pumps. The county storm water eventually drains to culverts according to the Pierce County Department of Public Works. The precise location of storm water discharge is unknown.

One pad-mounted transformer and one pole-mounted transformer were observed to be present on the subject property. The transformers present on the subject property exhibited no evidence of oil staining.

EPI reported that they were not aware of any ground water monitoring wells nor supply wells located on the property. In addition, EPI did not find evidence of ground water monitoring wells or supply wells on the property during the site visit; however, site observations were limited by parked vehicles.

During EPI's inspection, no areas of potential significant contamination were observed at the subject property. EPI did not observe any pools of liquid; soil staining or stressed vegetation; pits, ponds or lagoons; perceived odors; or solid waste disposal at the subject property. Furthermore, EPI did not observe any disturbed soil or pavement that might indicate the presence of a surface or subsurface impact to be present at the subject property.

Historical Property Uses

Historical records indicate that the property was mostly vegetated with limited residential activity from 1922 through 1947. An excavation contracting business was located at the center of the property from approximately 1953 to 1992, during which time diesel truck repair activities occurred. From approximately 1953 to the present, a gas station has been located on the northwest portion of the property. This gas station has been operated under various ownerships including: My Uncle Store, Chevron, and Safeway. Also located at the northwest portion of the property was a former plant nursery – Kim Nursery. All these businesses had concerns of environmental impacts associated with them.

A diesel truck repair shop associated with a contracting company was apparently present on the subject property prior to the construction of the Safeway store, and the subject property was adversely impacted due to these operations. Heating oil USTs associated with a former performed. This site is in the present-day location of a Safeway grocery store at southern portion of the property and the gas station on the northern portion of the property – bordering Portland Avenue and 72nd Street. It is not clear whether the Safeway gas fueling center includes a mini-

mart, as the former Chevron gas station did. Site cleanup was performed by unspecified contractor(s) at the northwest portion of the subject property, as explained by EPI. The Chevron service station functioned until late 1970s in the area of a current Safeway gasoline distribution service station.

EPI did not observe evidence of historical uses of the subject property during the site visit. However, EPI reviewed historical use information to assess whether previous uses of the subject property indicate recognized environmental conditions for the subject property.

EPI spoke with Mr. Tomlinson, who is familiar with the area of the subject property prior to the construction of the Safeway. Mr. Tomlinson stated that a diesel truck repair shop existed in the center of the subject property for a number of years prior to the redevelopment of the property to build a retail grocery store. He indicated that the repair shop may have been related to a family business and was built behind a residence on the property. During demolition of this repair shop in 1994, as Mr. Tomlinson reported, contaminated soil was encountered and it was excavated during development. Mr. Tomlinson was unaware of whether the property was fully remediated and whether or not the ground water was impacted.

According to personnel interviewed by EPI, there are no known violations of environmental regulations by Safeway at the subject property. Mr. Greene reported that he was not aware of any spills or releases of chemicals at the subject property due to Safeway's operations. Furthermore, personnel interviewed by EPI reported that no known indoor air quality or water quality problems are present at the subject property.

Equipment observed at the subject property that may contain polychlorinated biphenyls (PCBs) include:

- one pad-mounted transformer;
- one pole-mounted transformer;
- a hydraulic trash compactor;
- a hydraulic cardboard baler;
- dock plates in the truck loading areas; and
- several hydraulic hand jacks.

EPI noted two dry-type transformers in the mechanical room of the Safeway building. In addition, 15 compressors were observed in the mechanical room and no significant stains from compressor oil were observed during the site visit. No leaking or evidence of spills from the two on-site transformers was observed by EPI. In addition, personnel interviewed by EPI were not aware of any spills or leaks of oil from this equipment. The equipment was likely installed during Safeway store construction in 1994 and appeared to be owned by Tacoma Public Utilities. Personnel at the Tacoma Public Utilities stated that almost all of the existing transformers in the Tacoma area do not contain significant levels of PCBs and are considered non-PCB containing.

For these reasons and the fact that the equipment was likely installed after 1979 when PCBs were banned from use in commerce, the potential for adverse impacts to the subject property from this equipment is reduced.

No leaks or evidence of spills from the trash compactor and cardboard baler were observed by EPI during the site visit. In addition, the hydraulic hand jacks and dock plates in the truck loading area showed no evidence of significant leaks or spills of hydraulic oil. Personnel interviewed by EPI were not aware of any past spills or leaks of oil from these pieces of equipment. This equipment was installed during store construction and is serviced on an as-needed basis.

Environmental Concerns: Subject Property

Currently, there are no known underground storage tanks (USTs) or aboveground storage tanks (ASTs) present at the Safeway grocery store (except for the concrete storm water collection tanks under the truck loading area). However, the Safeway gasoline distribution service station has USTs associated with it.

Mr. Tomlinson stated that a he recalled a small tank being removed in the northwest portion of the site. This area of the site would have been the prior location of the retail horticultural store (Kim Nursery). Personnel interviewed by EPI were also aware of the prior removal of a small underground storage tank at the subject property (in the area of the former retail horticultural store).

In April of 1994, a 900-gallon heating oil UST was discovered in the northwestern portion of the site (former Kim Nursery). 154 gallons of oil and 770 gallons of water were pumped from the tank prior to removal. The tank was in poor condition and approximately 95 cubic yards of PCS were removed with the UST. No ground water was encountered in the excavation (to 12.5 bgs).

The subject property was identified as an Underground Storage Tank (UST) site and a Confirmed and Suspected Contaminated Sites List (CSCSL) site under the name "Safeway 72nd & Portland" and was a Chevron operated gasoline service station. According to the EDR report, the presence of petroleum products has been confirmed above MTCA cleanup levels at this site. The Ecology Site Status is listed as "Independent Remedial Action". The information in these reports indicated that three Ecology-registered 2,000-gallon diesel and gasoline tanks existed on the Chevron Rody site. In addition to these three tanks, one additional out-of-service 500-gallon gasoline storage tank existed on the property and reportedly had "extensive steel failure." Removal of these four tanks and 600-700 cubic yards of petroleum-contaminated soil (PCS) was completed on May 14, 1992. Field screening was used to confirm that all impacted soil had been removed from the tank area, and no ground water was encountered (to 9.5 feet bgs) during excavation. The impacted soil was bioremediated on-site and was reportedly clean

(below MTCA Method A cleanup levels) by August of 1992. According to EPI, Ecology has assigned a "No Further Action" (NFA) status for the environmental issues addressed by previous remedial actions. Ecology, however, does not have a record of this NFA.

The My Uncle's Store UST site (a former Chevron Service Station) was located on the northwest portion of the subject property in the area of the current Safeway gas station. According to historical records, this site has been used as a service station from as far back as 1953. Due to the long history of the use of this property as a service station, additional information regarding this site would be required before potential environmental impacts to the subject property can be evaluated. Removal of four USTs and petroleum impacted soils occurred in 1992. However, the bulk oil storage was not addressed and numerous other areas of the site appeared to be impacted with petroleum hydrocarbons. A restoration plan was proposed in June of 1993 to address these remaining issues. In July of 1993, impacted soil in the center and in the southeast areas of the site were excavated. Approximately 1,200 cubic yards of PCS were excavated and treated on-site using bioremediation techniques. Remediation was completed in December of 1993 and the treated soil was used as grading material.

In February of 1994, an additional area of contaminated soil was discovered. During excavation of this PCS, the excavation collected significant amounts of water from surface sources. Approximately 100,000 gallons of water was ultimately pumped from the excavation to the sanitary sewer under appropriate discharge permits, and in April of 1994, approximately 900 cubic yards of PCS were treated off-site using thermal desorption.

During grading activities for the Safeway grocery store, an abandoned heating oil tank was discovered near the southwest corner of the site (reported on March 3, 1994) related to a former residence. The 675-gallon tank contained 475 gallons of contaminated water and the tank was in poor condition. Approximately 78 tons of PCS were removed and sent to an off-site thermal desorption facility. No ground water was encountered during the 9-foot deep excavation.

During all of the remedial actions in the 1990s, compliance samples indicated that the petroleum contaminated soil (PCS) had been successfully removed from each excavation, in accordance with the regulations in force at the time. To confirm that remedial techniques were effective, in February of 1996, a boring was advanced on the site in one of the formerly-impacted areas and soil and perched ground water samples were collected (to 8 feet bgs). No adverse impacts were noted as a result of this confirmational boring. It would be desirable to see more sampling performed at the location to demonstrate the compliance with regulations.

Independent Remedial Action Reports were submitted to Ecology for review in May of 1996 to obtain a "No Further Action" (NFA) designation for the site. In October of 1996, the subject property received an NFA from Ecology, as indicated by EPI. Ecology does not, however have records of that action.

The following EPI's conclusions are supported by the findings of the November 2, 2000, Phase

II ESA, by EPI:

- Subsurface Conditions at the subject property generally consisted of interbedded layers of clayey sand with gravel, sandy lean clay, silty sand with gravel, and poorly graded sand with gravel down to a depth of about 36.5 feet below grade.

- The results of field screening and laboratory analytical results for soil samples indicates that there is a zone of PCS from near the surface to less than 10 feet below grade in the vicinity of borings TB-1, TB-2, and TB-3. According to the laboratory, shallow soil samples from these borings have been identified as containing *"lightly weathered gasoline"* suggesting that a surface release(s) may have occurred recently and could possibly represent ongoing surface spillage. It is Ecology's understanding that these contaminated soils were excavated in January 2002 and during previous cleanup actions taken on the property. **Ecology's Comment: The possible subsurface releases are not addressed in the Phase II ESA.**

- Ground water was not encountered in any of the borings up to 36.5 feet below grade, thus it is unlikely that ground water at the subject property has been impacted by on-site surface releases of petroleum, as petroleum-contaminated soils appear to be confined to less than 10 feet below grade in the areas sampled. However, EPI was not able to sample soil immediately beneath the current USTs or beneath the mini-mart building where historic USTs may have been located. There remains the possibility that deeper soil contamination and potentially ground water contamination could be present in those areas.

- According to information maintained by the Pierce County Fire Marshall's office, and confirmed by a review of aerial photographs, there is a possibility that up to three small USTs were, or are still, located underneath the present location of the mini-mart on the subject property. There is no available documentation to show that these USTs have been removed. Due to the small size of the subject property, and the presence of numerous underground utilities, EPI was unable to sample soils underneath the mini-mart, therefore it is unknown if these USTs have leaked and impacted the subsurface. Given the location of these USTs beneath the on-site building, the only way to reliably predict soil impacts beneath the building would be to collect soil samples through the floor. **Ecology's comment: The soils within the footprint of the structure need to be explored to make sure no contamination remains under the building.**

- The detected concentration of arsenic in TB-3:5.5' likely represents a background concentration of arsenic, and does not represent a recognized environmental condition. According to the Washington State Department of Ecology's Publication #94-1 15 (Natural Background Soil Metals Concentrations in Washington State), the 90th percentile value for arsenic in soil in the Puget Sound region is 7 mg/kg, well above the

concentration detected in TB-3:5.5'.

Given the 47 year history of the subject property as an active gasoline station and the available environmental data, it is likely that soils at the site are impacted with petroleum hydrocarbons to a depth of about 10 feet below grade or deeper. It is also not unreasonable to assume that deeper soil and ground water contamination is present beneath the existing USTs and the location of historic USTs beneath the on-site building. **Ecology's Comment: The site extends beyond the property boundaries. The site has most likely been impacted by the petroleum releases, and has not been characterized beyond the property lines on 72nd E Street and Portland Avenue.**

Environmental Concerns: Vicinity Properties

Two LUST sites were identified within one-half mile of the subject property. The Texaco Station #63-232-1425 and Jackpot Station 343 LUST sites are located 0.20 and 0.40 miles, respectively, west and up-slope of the subject property. According to the EDR report, the release status of the first site is "cleanup started" and the release status of the second site is "reported cleaned up". Due to the regulatory status of the Jackpot Station 343 LUST site and the distance from the subject property, the potential for adverse impacts to the subject property from this site may be reduced. However, additional information regarding the current status and extent of environmental impacts regarding the Texaco Station #63-232-1 425 LUST site is required to evaluate potential impacts to the subject property.

Confirmed and Suspected Contaminated Sites List (CSCS List) information includes known, and suspected hazardous waste disposal sites in the State of Washington and may include leaking underground storage tank sites. Three CSCSL sites were identified within one mile of the subject property. The Franklin Site, 8007 McKinley Ave E and Buffalo Don Murphy Waller Rd CSCSL sites are located between 0.70 miles and 0.95 miles from the subject property. Due to the distance of these CSCSL sites from the subject property, the potential for adverse impacts may be reduced.

SWF/LF sites are facilities used for solid waste disposal or related operations, such as transfer stations and landfills. One SWF/LF site was identified within one-half mile of the subject property. The Walrath Trucking LF site is located 0.40 miles southwest and up-slope of the subject property. The EDR report indicates that this is a privately owned recycling facility. This site did not appear on any other regulatory databases searched by EPI for this report. For this reason, the potential for adverse impacts from this SWL/LF site to the subject property may be reduced.

Cleanup Activities

1992 - According to the EDR report, the presence of petroleum products has been confirmed above MTCA cleanup levels at this site. The Ecology Site Status is listed as "Independent

Remedial Action". The Information in these reports indicated that three Ecology-registered 2,000-gallon diesel and gasoline tanks existed on the Rody Chevron site. In addition to these three tanks, one additional out-of-service 500-gallon gasoline storage tank existed on the property and reportedly had "extensive steel failure." Removal of these four tanks and 600-700 cubic yards of petroleum-contaminated soil (PCS) was completed on May 14, 1992. Field screening was used to confirm that all impacted soil had been removed from the tank area, and no ground water was encountered (to 9.5 feet bgs) during excavation. The impacted soil was bioremediated on-site and 'was reportedly clean (below MTCA Method A cleanup levels) by August of 1992.

1993 - However, the bulk oil storage was not addressed and numerous other areas of the site appeared to be impacted with petroleum hydrocarbons. A restoration plan was proposed in June of 1993 to address these remaining issues. In July of 1993, impacted soil in the center and in the southeast areas of the site were excavated. Approximately 1,200 cubic yards of PCS were excavated and treated on-site using bioremediation techniques. Remediation was completed in December of 1993 and the treated soil was used as grading material.

1994 – In February of 1994, an additional area of contaminated soil was discovered. During excavation of this PCS, the excavation collected significant amounts of water from surface sources. Approximately 100,000 gallons of water was ultimately pumped from the excavation to the sanitary sewer under appropriate discharge permits, and in April of 1994, approximately 900 cubic yards of PCS were treated off-site using thermal desorption.

During grading activities for the Safeway grocery store, an abandoned heating oil tank was discovered near the southwest corner of the site (reported on March 3, 1994) related to a former residence. The 675-gallon tank contained 475 gallons of contaminated water and the tank was in poor condition. Approximately 78 tons of PCS were removed and sent to an off-site thermal desorption facility. No ground water was encountered during the 9-foot deep excavation.

In April of 1994, a 900-gallon heating oil UST was discovered in the northwestern portion of the site (former Kim Nursery). 154 gallons of oil and 770 gallons of water were pumped from the tank prior to removal. The tank was in poor condition and approximately 95 cubic yards of PCS were removed with the UST. No ground water was encountered in the excavation (to 12.5 bgs).

1996 - During all of the remedial actions, compliance samples indicated that the PCS had been successfully removed from each excavation in accordance with the regulations in force at the time. To confirm that remedial techniques were effective, in February of 1996, a boring was advanced on the site in one of the formerly-impacted areas and soil and perched ground water samples were collected (to 8 feet bgs). No adverse impacts were noted as a result of this confirmational boring.

According to EPI, Independent Remedial Action Reports were submitted to Ecology for review

in May of 1996 to attain a "No Further Action" (NFA) determination for the site. In October of 1996, the subject property received an NFA from Ecology in accordance with the regulations in force at the time. Ecology, however cannot locate the documentation relating to this action.

2002 - A diesel truck repair shop associated with a contracting company was apparently present on the center of the subject property prior to the construction of the Safeway store, and the subject property was adversely impacted due to these operations. Heating oil USTs associated with a former residence (southwest corner) and Nursery (northwest corner) on the site also contributed to PCS impacts. Site cleanup was performed.

Approximately 5,100 tons (or approximately 3,000 cubic yards) of PCS were excavated for off-site disposal from January 4, 2002 through January 17, 2002. Soil performance samples were collected and analyzed by an on-site mobile laboratory (Environmental Services Network Northwest; Lacey, Washington). The north and west sidewall confirmatory sampling exceeds MTCA Method A for gasoline and BTEX. **The description of the site is erroneous – the site actually extends beyond the property boundary to the north and west, onto and perhaps beyond the 72nd Street and Portland Avenue.**

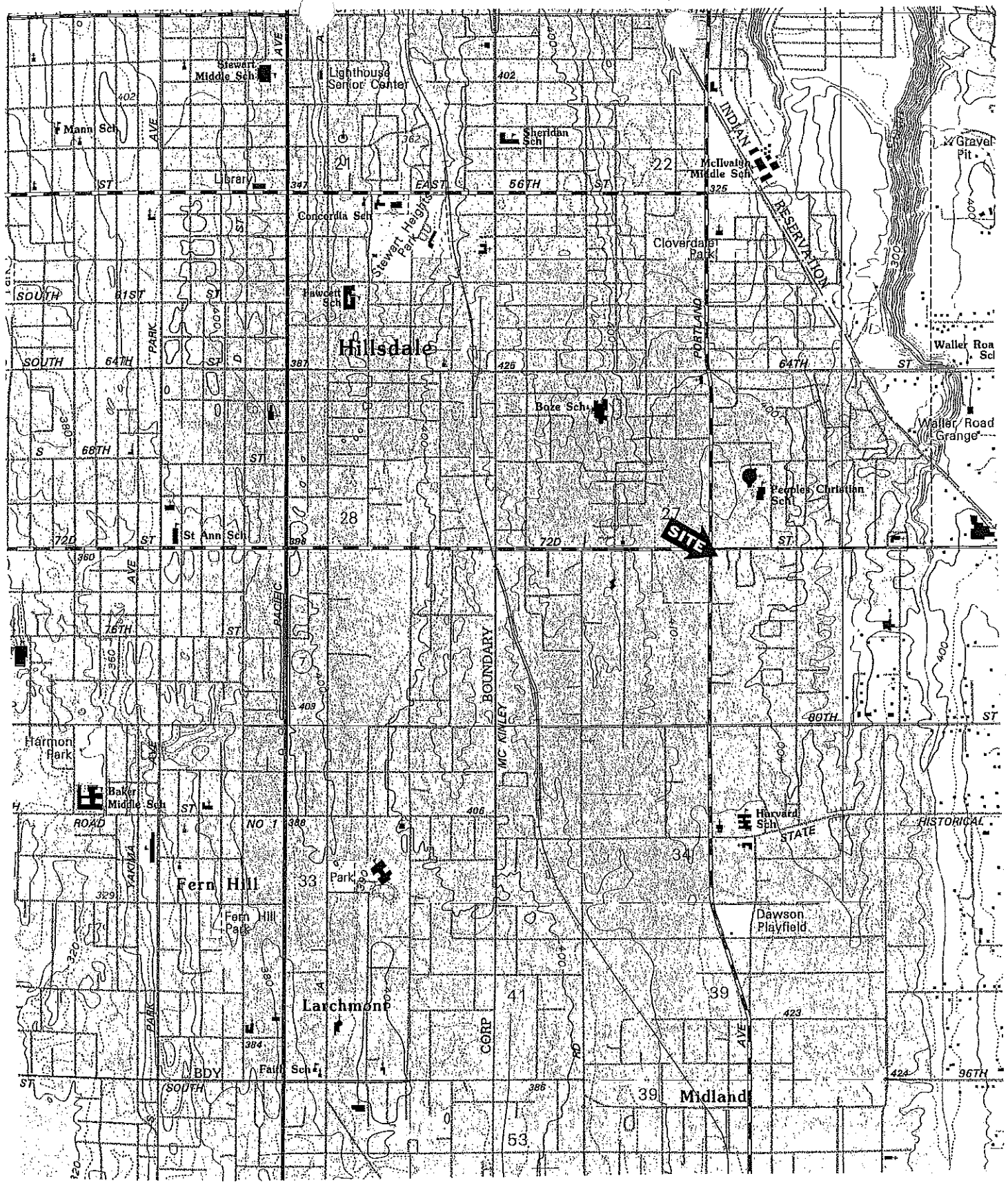
Based upon investigations previous to 2002, the contaminants of concern were known to be gasoline-range hydrocarbons and BTEX constituents (i.e., benzene, toluene, ethylbenzene, and xylenes). Other potential contaminants of concern were analyzed during past investigations and were determined to either (1) not be present at the site (e.g., MTBE) or (2) present in quantities lower than the allowable MTCA Method A Soil Cleanup Level for Unrestricted Land Uses (e.g., lead).

The horizontal extent of the excavation was governed by:

- Soil samples showing non-detect levels of contamination or levels below the MTCA Method A Soil Cleanup Levels for Unrestricted Land Use to the east and south of the former Chevron fueling station; and
- Utilities (both underground and aboveground) and heavily-used public roadways (i.e., 72nd Street East and Portland Avenue) to the north and west of the former Chevron fueling station up to the property line (property boundary is not coincidental with site boundary).

Initially, petroleum-contaminated water was encountered in the former Chevron underground storage tank (UST) cavity prior to over-excavation. However, a consistent ground water table was not observed during the excavation to 13 feet bgs. The water initially encountered in the excavation was pumped into an on-site holding tank and, afterwards, the excavation was observed to remain generally dry during PCS removal to the vertical limits of the excavation (i.e., to 13 feet bgs). During the excavation in the days that followed, minor seepage was noted from areas near former utility lines and isolated permeable lenses. Excavation was performed during a seasonally wet period, and rainfall was encountered and pumped from the excavation approximately every three days. Water treatment and discharge to the sanitary sewer was

appropriately coordinated and permitted through the City of Tacoma. Approximately 45,000 gallons were discharged to the City of Tacoma sanitary sewer following treatment.



KEY

SOURCE: USGS 7.5 MINUTE QUANDRANGLE (TOPOGRAPHIC)

TACOMA SOUTH, WA
1961
PHOTOREVISED 1994

N

SCALE: 1:24,000

ENVIRONMENTAL PARTNERS INC

FIG 1

GENERAL VICINITY MAP

PROJECT	08268.2
PREPARED FOR	SAFEWAY INC.
LOCATION	7201 PORTLAND AVENUE TACOMA, WASHINGTON

SHEET	DRAWN BY	REVIEWED BY	DATE
1 of 1	APJ	TCM	4/25/02

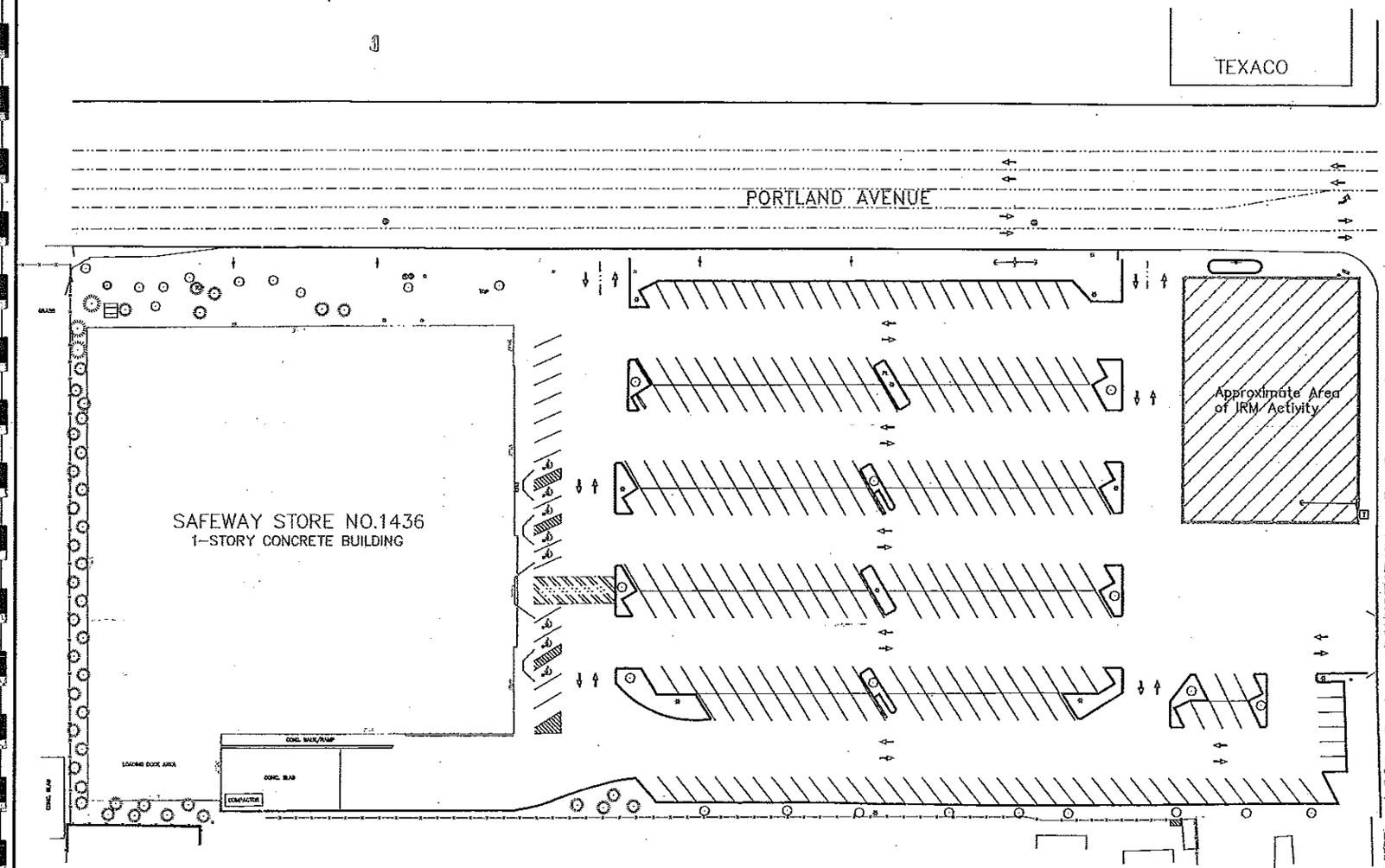


Fig. 2

ORIGINAL BASEMAP FROM IN FORM, INC. (KIRKLAND, WA)

ENVIRONMENTAL PARTNERS INC
10940 NE 33rd PLACE, STE. 110
BELLEVUE, WASHINGTON 98004
TEL. 425-889-4747
FAX 425-889-4755

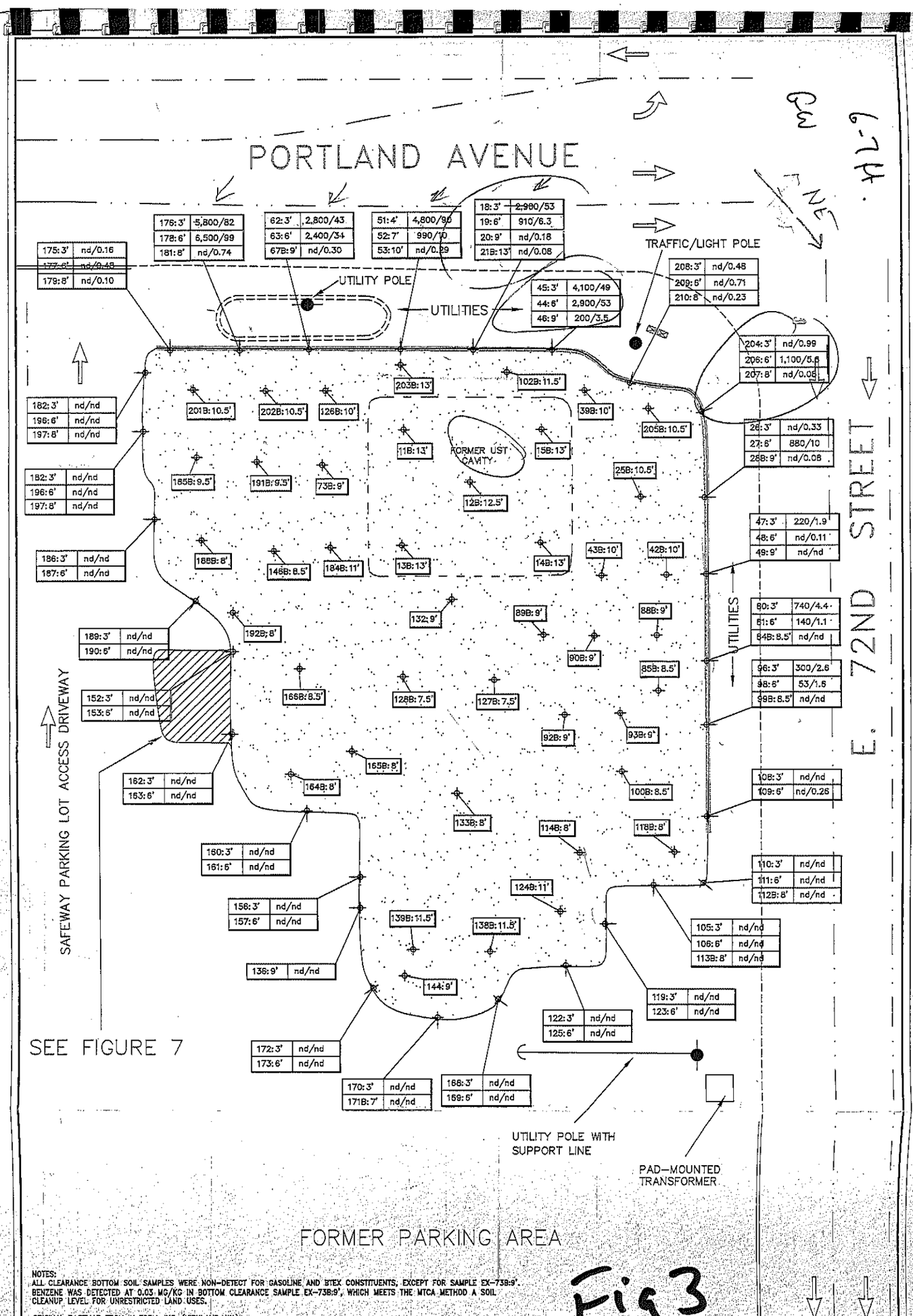
FIGURE 1
GENERAL LOCATION OF IRM ACTIVITIES

#	M/D/Y	EXPLANATION
REV.	DATE	DESCRIPTION

DATE

PROJECT	08268.2
PREPARED FOR	TPCHD
LOCATION	SAFEWAY STORE #1436, 72ND/PORTLAND TACOMA, WASHINGTON

SHEET	DRAWN BY	REVIEWED BY	DATE DRAWN
1 of 1	APJ	TCM	01/24/02



NOTES:
ALL CLEARANCE BOTTOM SOIL SAMPLES WERE NON-DETECT FOR GASOLINE AND BTEX CONSTITUENTS, EXCEPT FOR SAMPLE EX-73B:9'. BENZENE WAS DETECTED AT 0.03 MG/KG IN BOTTOM CLEARANCE SAMPLE EX-73B:9', WHICH MEETS THE MTCA METHOD A SOIL CLEANUP LEVEL FOR UNRESTRICTED LAND USES.

ORIGINAL BASEMAP FROM IN FORM, INC. (KIRKLAND, WA)

Fig 3

KEY

136:9' nd/nd — SIDEWALL PERFORMANCE SOIL SAMPLE WITH SAMPLE NAME:DEPTH (FT) AND GASOLINE/BENZENE CONCENTRATIONS (IN MG/KG).

139B:11.5' — BOTTOM PERFORMANCE SOIL SAMPLE WITH SAMPLE NAME:DEPTH (FT).

'DICATES PRESENCE OF IN-PLACE SOIL WITH NCENTRATIONS ABOVE MTCA METHOD A

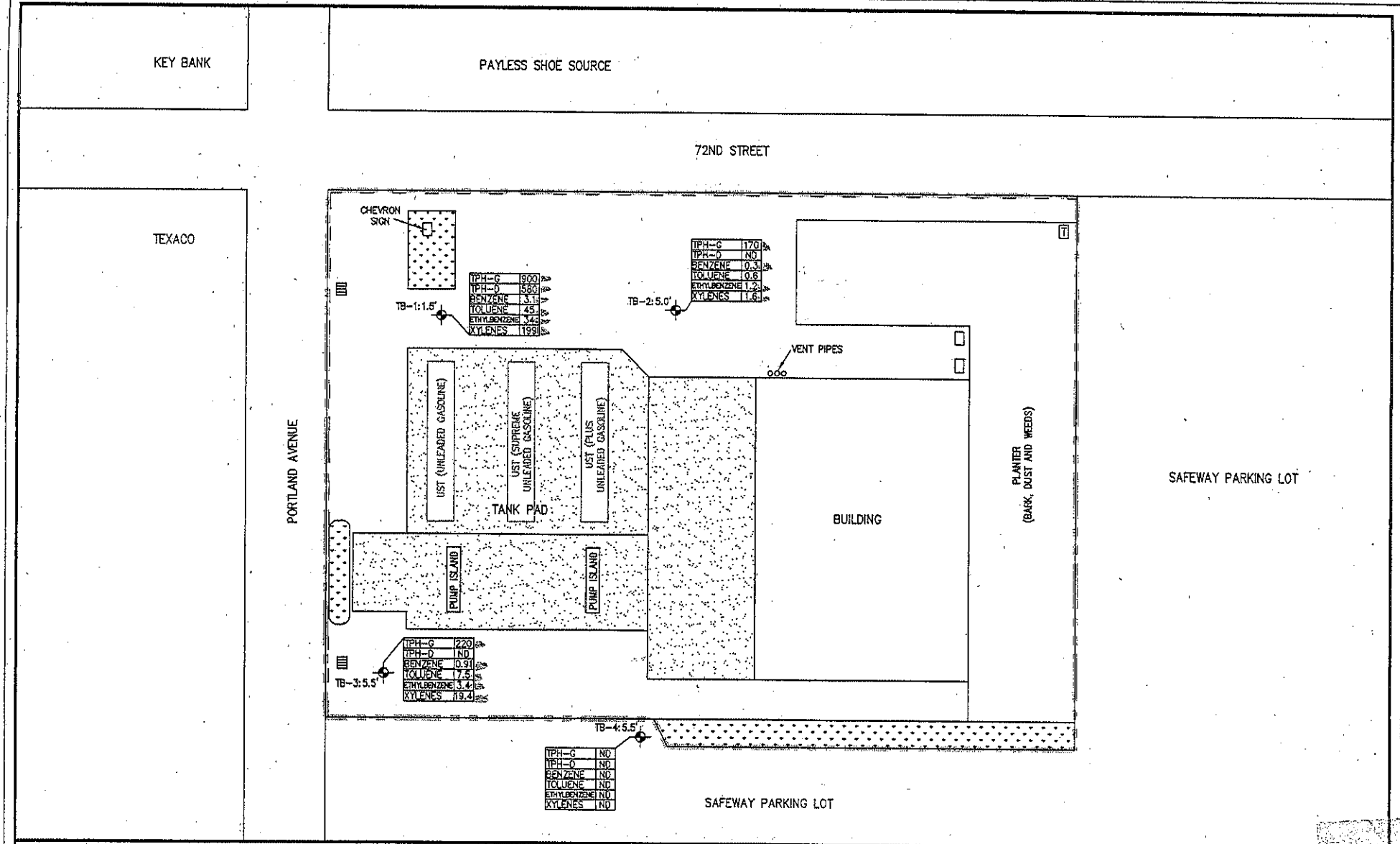
SCALE: 1"=15'

ENVIRONMENTAL PARTNERS INC

FIGURE 3
CLEARANCE SOIL SAMPLES - IRM EXCAVATION, JANUARY 2002

PROJECT	08258.2
PREPARED FOR	SAFEWAY, INC.
LOCATION	SAFEWAY STORE #1436, 72ND/PORTLAND TACOMA, WASHINGTON

SHEET	DRAWN BY	REVIEWED BY	DATE
1 of 1	APJ	TCM	02/25/02



KEY

STORM DRAIN

PAD-MOUNTED TRANSFORMER

TB-4 SAMPLE LOCATION

APPROXIMATE SUBJECT PROPERTY BOUNDARY

OVERHEAD POWER LINES

PLANTER

CONCRETE

N

SCALE: 1"=25'

ENVIRONMENTAL PARTNERS INC

FIGURE 3
PETROLEUM HYDROCARBON AND BTEX CONCENTRATIONS IN SHALLOW SOIL SAMPLES IN mg/kg

PROJECT	08268.1
PREPARED FOR	SAFEWAY INC.
LOCATION	7201 PORTLAND AVENUE TACOMA, WASHINGTON

SHEET	DRAWN BY	REVIEWED BY	DATE
1 of 1	VRR	AMJ	10/24/00

Fig. 4

Shaded remain in place.

Table 1

TABLE 2
Performance Soil Sample Analytical Results in milligrams/kilogram - IRM Excavation
Safeway Store No. 1436, Former Chevron Station (My Uncle's Store)
72nd Street East/Portland Avenue, Tacoma, Washington

Sample Name	Depth	Date Collected	Final Performance Sample	Oil-Range Petroleum Hydrocarbons[1]	Diesel-Range Petroleum Hydrocarbons[2]	Gasoline-Range Petroleum Hydrocarbons[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Xylenes[4]
EX-1	6'	1/3/2002		<40	<20	<10	0.81	0.71	0.08	0.64
EX-2	5'	1/3/2002		<40	<20	1,900	18	167	50	300
EX-3	5'	1/3/2002		<40	<20	4.4	23	8.3	50	410
EX-4	5'	1/3/2002		<40	<20	<10	2.1	2.1	0.71	3.8
EX-5	6'	1/3/2002		<40	<20	6,100	37	480	140	840
EX-6	5'	1/3/2002		<40	<20	2,100	29	180	43	270
EX-7	5'	1/3/2002		<40	<20	1,700	9.1	76	32	200
EX-8	5'	1/3/2002		<40	<20	3,500	19	220	65	410
EX-9B	12'	1/3/2002		<40	<20	<10	0.99	<0.05	<0.05	<0.05
EX-10B	12'	1/3/2002		<40	<20	<10	0.53	0.72	0.27	1.4
EX-11B	12'	1/4/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-12B	12.5'	1/4/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-13B	13'	1/4/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-14B	13'	1/4/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-15B	13'	1/4/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-16	9'	1/4/2002		<40	<20	<10	0.22	0.07	<0.05	<0.05
EX-17	6'	1/4/2002		<40	<20	<10	0.13	1.0	0.56	3.0
EX-18	3'	1/4/2002	X	--	--	2,900	53	310	75	450
EX-19	6'	1/4/2002	X	<40	<20	910	6.3	57	15	110
EX-20	9'	1/4/2002	X	--	--	<10	0.18	0.16	<0.05	0.05
EX-21B	13'	1/4/2002	X	<40	<20	<10	0.08	0.08	<0.5	0.05
EX-22	3'	1/7/2002		<40	<20	<10	1.3	0.54	0.21	0.38
EX-23	6'	1/7/2002		<40	<20	690	11	41	14	72
EX-24	9'	1/7/2002		--	--	<10	0.08	<0.05	<0.05	<0.05
EX-25B	12.5'	1/7/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-26	3'	1/7/2002	X	--	--	<10	0.33	<0.05	<0.05	<0.05
EX-27	6'	1/7/2002	X	<40	<20	880	10	69	19	120
EX-28B	9'	1/7/2002	X	<40	<20	<10	0.08	0.13	<0.05	0.17
EX-29	3'	1/7/2002		<40	<20	<10	1.6	0.59	1.6	3.4
EX-30	3'	1/7/2002		--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-31	3'	1/7/2002		<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-32	3'	1/7/2002		--	--	<10	0.05	<0.05	0.18	0.31
EX-33	3'	1/7/2002		<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-34	3'	1/7/2002		--	--	1,900	5.0	12	18	97
EX-35	8'	1/7/2002		<40	<20	<10	0.25	0.20	0.05	0.42
EX-36	4'	1/7/2002		<40	<20	730	4.0	26	9.0	57
EX-37	6'	1/7/2002		<40	<20	480	11	33	7.9	43
EX-38	3'	1/7/2002		<40	63	590	9.8	38	10	73
EX-39B	10'	1/7/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-40	6'	1/7/2002		--	--	<10	0.22	0.15	<0.05	0.20
EX-41	6'	1/7/2002		<40	<20	2,900	12	35	35	190
EX-42B	10'	1/7/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-43B	10'	1/7/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-44	6'	1/7/2002	X	<40	<20	2,900	53	170	42	250
EX-45	3'	1/7/2002	X	--	--	4,100	49	174	58	340
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use[5]				2,000	2,000	30/100[6]	0.03	7	6	9

Table 2

TABLE 2 (continued)
Performance Soil Sample Analytical Results in milligrams/kilogram - IRM Excavation
Safeway Store No. 1436, Former Chevron Station (My Uncle's Store)
72nd Street East/Portland Avenue, Tacoma, Washington

Sample Name	Depth	Date Collected	Final Performance Sample	Oil-Range Petroleum Hydrocarbons[1]	Diesel-Range Petroleum Hydrocarbons[2]	Gasoline-Range Petroleum Hydrocarbons[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Xylenes[4]
EX-46	9'	1/7/2002	X	<40	<20	200	3.5	8.1	2.8	17
EX-47	3'	1/7/2002	X	--	--	220	1.9	<0.05	2.8	2.6
EX-48	6'	1/7/2002	X	<40	<20	<10	0.11	0.06	0.08	0.26
EX-49	9'	1/7/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-50	6'	1/8/2002		<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-51	4'	1/8/2002	X	<40	<20	4,800	90	450	100	610
EX-52	7'	1/8/2002	X	<40	<20	990	10	70	20	110
EX-53	10'	1/8/2002	X	--	--	<10	0.29	0.49	0.14	0.55
EX-54B	11'	1/8/2002		<40	<20	<10	0.13	<0.05	<0.05	<0.05
EX-55B	10'	1/8/2002		<40	<20	<10	0.13	<0.05	<0.05	<0.05
EX-56	6'	1/8/2002		<40	<20	43	0.96	4.5	1.4	9.5
EX-57B	11'	1/9/2002		--	--	<10	1.2	<0.05	<0.05	<0.05
EX-58	3'	1/9/2002		<40	<20	8,600	150	740	180	1,000
EX-59	6'	1/9/2002		--	--	820	10	45	14	73
EX-60	3'	1/9/2002		<40	<20	2,600	49	240	50	310
EX-61	3'	1/9/2002		--	--	3,500	55	220	71	390
EX-62	3'	1/9/2002	X	<40	<20	2,800	43	220	51	330
EX-63	6'	1/9/2002	X	--	--	2,400	34	220	63	340
EX-64	3'	1/9/2002		--	--	12	0.68	0.69	0.33	1.6
EX-65	6'	1/9/2002		<40	<20	<10	0.52	0.69	0.36	1.5
EX-66B	9'	1/9/2002		--	--	<10	0.39	0.19	0.14	0.53
EX-67B	9'	1/9/2002	X	<40	<20	<10	0.30	0.34	0.16	0.68
EX-68B	9'	1/9/2002		--	--	<10	0.50	<0.05	<0.05	<0.05
EX-69	3'	1/9/2002		<40	<20	<10	0.07	0.73	0.38	1.6
EX-70	6'	1/9/2002		--	--	1,900	15	170	52	290
EX-71B	9'	1/9/2002		<40	<20	<10	0.07	0.17	0.08	0.26
EX-72	6'	1/9/2002		<40	<20	<10	0.03	0.29	0.14	0.74
EX-73B	9'	1/9/2002	X	--	--	<10	0.03	<0.05	<0.05	<0.05
EX-74B	9'	1/9/2002		<40	<20	<10	0.09	<0.05	<0.05	<0.05
EX-75	4'	1/9/2002		--	--	3,000	27	280	69	430
EX-76	3'	1/9/2002		<40	<20	<10	0.10	0.18	0.74	4.7
EX-77	7'	1/9/2002		<40	<20	550	3.2	16	8.8	62
EX-78	6'	1/9/2002		<40	<20	1,400	8.9	17	24	130
EX-79B	9'	1/9/2002		--	--	<10	0.36	0.08	0.08	0.11
EX-80	3'	1/10/2002	X	<40	<20	740	4.4	4.0	12	34
EX-81	6'	1/10/2002	X	--	--	140	1.1	0.92	1.8	11
EX-82	3'	1/10/2002		--	--	52	0.26	0.62	1.1	5.4
EX-83	6'	1/10/2002		<40	<20	1,700	16	14	30	130
EX-84B	8.5'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-85B	8.5'	1/10/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-86	3'	1/10/2002		--	--	130	1.1	2.7	2.1	12
EX-87	6'	1/10/2002		<40	<20	--	--	--	--	--
EX-88B	9'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-89B	9'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-90B	9'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use[5]				2,000	2,000	30/100[6]	0.03	7	6	9

TABLE 2 (continued)
Performance Soil Sample Analytical Results in milligrams/kilogram - IRM Excavation
Safeway Store No. 1436, Former Chevron Station (My Uncle's Store)
72nd Street East/Portland Avenue, Tacoma, Washington

Sample Name	Depth	Date Collected	Final Performance Sample	Oil-Range Petroleum Hydrocarbons[1]	Diesel-Range Petroleum Hydrocarbons[2]	Gasoline-Range Petroleum Hydrocarbons[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Xylenes[4]
EX-91	5.5'	1/10/2002		--	--	<10	0.03	0.23	0.26	1.0
EX-92B	9'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-93B	9'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-94	3'	1/10/2002		--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-95	4'	1/10/2002		<40	<20	2,900	13	26	32	200
EX-96	3'	1/10/2002	X	--	--	300	2.6	1.2	4.4	15
EX-97	4'	1/10/2002		<40	<20	<10	0.12	0.28	0.26	0.98
EX-98	6'	1/10/2002	X	<40	<20	53	1.6	0.88	1.6	7.6
EX-99B	8.5'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-100B	8.5'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-101	6'	1/10/2002		--	--	--	--	--	--	--
EX-102B	11.5'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-103B	11.5'	1/10/2002		--	--	<10	0.12	<0.05	<0.05	<0.05
EX-104B	9.5'	1/10/2002		--	--	<10	0.08	<0.05	<0.05	<0.05
EX-105	3'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-106	6'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-107	6'	1/10/2002		--	--	74	1.3	<0.05	1.4	1.2
EX-108	3'	1/10/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	0.12
EX-109	6'	1/10/2002	X	--	--	<10	0.26	0.36	0.65	2.9
EX-110	3'	1/10/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-111	6'	1/10/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-112B	8'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-113B	8'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-114B	8'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-115	3'	1/11/2002		--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-116	6'	1/11/2002		--	--	<10	1.2	0.97	0.43	0.43
EX-117	5'	1/11/2002		--	--	13	<0.02	<0.05	0.19	0.14
EX-118B	8'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-119	3'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-120	6'	1/11/2002		--	--	830	<0.02	<0.05	<0.05	<0.05
EX-121	6'	1/11/2002		<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-122	3'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-123	6'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-124B	11'	1/11/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-125	6'	1/11/2002	X	<40	<20	<10	<0.02	<0.05	0.19	0.14
EX-126B	10'	1/11/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-127B	7.5'	1/14/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-128B	7.5'	1/14/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-129	4'	1/14/2002		--	--	3,100	0.71	3.4	<0.05	<0.05
EX-130	4'	1/14/2002		<40	<20	<10	0.06	0.20	0.41	1.7
EX-131	4'	1/14/2002		--	--	7,400	1.1	6.8	8.4	29
EX-132	9'	1/14/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-133B	8'	1/14/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-134	4'	1/14/2002		83	<20	370	1.7	<0.05	3.8	2.9
EX-135	4'	1/14/2002		--	--	--	--	--	--	--
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use[5]				2,000	2,000	30/100[6]	0.03	7	6	9

TABLE 2 (continued)
Performance Soil Sample Analytical Results in milligrams/kilogram - IRM Excavation
Safeway Store No. 1436, Former Chevron Station (My Uncle's Store)
72nd Street East/Portland Avenue, Tacoma, Washington

Sample Name	Depth	Date Collected	Final Performance Sample	Oil-Range Petroleum Hydrocarbons[1]	Diesel-Range Petroleum Hydrocarbons[2]	Gasoline-Range Petroleum Hydrocarbons[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Xylenes[4]
EX-136	9'	1/14/2002	X	--	--	<10	<0.02	<0.05	0.40	1.1
EX-137	10'	1/14/2002		<40	<20	120	1.9	1.9	3.3	2.2
EX-138B	11.5'	1/14/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-139B	11.5'	1/14/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-140	3'	1/14/2002		--	--	<10	0.23	0.51	0.26	1.3
EX-141	6'	1/14/2002		--	--	12	0.09	0.12	0.71	3.5
EX-142	3'	1/14/2002		--	--	<10	0.32	<0.05	0.37	0.28
EX-143	6'	1/14/2002		--	--	110	0.38	<0.05	0.99	0.92
EX-144	9'	1/14/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-145	5'	1/14/2002		--	--	<10	<0.02	0.12	<0.05	0.16
EX-146B	8.5'	1/14/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-147	5'	1/14/2002		--	--	1,200	<0.02	<0.05	<0.05	<0.05
EX-148	3'	1/15/2002		<40	540	3,300	<0.02	<0.05	<0.05	<0.05
EX-149	6'	1/15/2002		<40	<20	68	<0.02	<0.05	<0.05	<0.05
EX-150B	8'	1/15/2002		<40	<20	<10	0.04	<0.05	<0.05	<0.05
EX-151B	9.5'	1/15/2002		--	--	<10	0.32	0.17	0.10	0.32
EX-152	3'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-153	6'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-154	3'	1/15/2002		--	--	270	<0.02	0.19	0.26	1.1
EX-155	3'	1/15/2002		--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-156	3'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-157	6'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-158	5'	1/15/2002		1,100	<20	8,200	0.42	<0.05	8.4	33
EX-159	6'	1/15/2002		67	<20	960	<0.02	<0.05	<0.05	<0.05
EX-160	3'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-161	6'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-162	3'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-163	6'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-164B	8'	1/15/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-165B	8'	1/15/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-166B	8.5'	1/15/2002	X	--	--	<10	0.06	<0.05	<0.05	<0.05
EX-167B	12'	1/16/2002		--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-168	3'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-169	6'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-170	3'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-171B	7'	1/16/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-172	3'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-173	6'	1/16/2002	X	--	--	<10	0.21	<0.05	<0.05	<0.05
EX-174B	10'	1/16/2002		--	--	<10	0.16	<0.05	<0.05	<0.05
EX-175	3'	1/16/2002	X	--	--	5,800	82	460	120	710
EX-176	3'	1/16/2002	X	--	--	<10	0.48	0.17	0.05	0.16
EX-177	6'	1/16/2002	X	<40	<20	6,500	99	600	140	860
EX-178	6'	1/16/2002	X	--	--	<10	0.10	0.13	0.10	0.48
EX-179	8'	1/16/2002	X	--	--	<10	0.81	0.90	0.19	0.92
EX-180B	9.5'	1/16/2002		<40	<20					
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use[6]				2,000	2,000	30/100[6]	0.03	7	6	9

TABLE 2 (continued)
Performance Soil Sample Analytical Results in milligrams/kilogram - IRM Excavation
Safeway Store No. 1436, Former Chevron Station (My Uncle's Store)
72nd Street East/Portland Avenue, Tacoma, Washington

Sample Name	Depth	Date Collected	Final Performance Sample	Oil-Range Petroleum Hydrocarbons[1]	Diesel-Range Petroleum Hydrocarbons[2]	Gasoline-Range Petroleum Hydrocarbons[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Xylenes[4]
EX-181	8'	1/16/2002	X	--	--	<10	0.74	0.07	0.14	0.26
EX-182	3'	1/16/2002		--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-183	6'	1/16/2002		--	--	<10	**0.07**	<0.05	<0.05	<0.05
EX-184B	11'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-185B	9.5'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-186	3'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-187	6'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-188B	8'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-189	3'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-190	6'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-191B	9.5'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-192B	8'	1/16/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-193B	10'	1/17/2002		--	--	<10	**0.08**	<0.05	<0.05	<0.05
EX-194B	10'	1/17/2002		<40	<20	<10	**0.07**	<0.05	<0.05	<0.05
EX-195B	12.5'	1/17/2002		--	--	<10	**0.14**	0.10	<0.05	0.10
EX-196	6'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-197	8'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-198	3'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-199	6'	1/17/2002	X	<40	<20	<10	<0.02	<0.05	<0.05	<0.05
EX-200	8'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-201B	10.5'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-202B	10.5'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-203B	13'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-204	3'	1/17/2002	X	--	--	<10	0.99	0.12	0.74	3.4
EX-205B	10.5'	1/17/2002	X	--	--	<10	<0.02	<0.05	<0.05	<0.05
EX-206	6'	1/17/2002	X	<40	<20	1,100	5.6	49	20	120
EX-207	8'	1/17/2002	X	--	--	<10	0.08	0.08	<0.05	0.06
EX-208	3'	1/17/2002	X	--	--	<10	0.48	1.3	0.70	5.2
EX-209	6'	1/17/2002	X	--	--	<10	0.71	0.48	1.2	5.3
EX-210	8'	1/17/2002	X	--	--	<10	0.23	0.08	0.14	0.33
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use[5]				**2,000**	**2,000**	**30/100[6]**	**0.03**	**7**	**6**	**9**

Notes:
(1) Total petroleum hydrocarbons in the oil-range using Ecology Method NWTPH-Dx.
(2) Total petroleum hydrocarbons in the diesel-range using Ecology Method NWTPH-Dx.
(3) Total petroleum hydrocarbons in the gasoline-range using Ecology Method NWTPH-Gx.
(4) Using EPA Method 8021.
(5) Model Toxics Control Act, August 2001.
(6) According to MTCA, the higher cleanup level (i.e., 100 mg/kg) applies if the gasoline mixture does not contain benzene and contains less than 1% of the total of ethylbenzene, toluene, and xylenes. All other gasoline mixtures must meet the lower cleanup level (i.e., 30 mg/kg).
Bolded values are those which exceed the applicable soil cleanup level.
'X' indicates final performance sample.
Shaded results indicate those final performance samples with concentrations above the applicable soil cleanup level.
'--' = not analyzed

Table 2

~~Table 2~~

Summary of Soil Sample Petroleum Hydrocarbon Analytical Results
in milligrams/kilogram
Phase II Environmental Site Assessment
7201 Portland Avenue, Tacoma, Washington

Sample Location	Sample Depth (feet)	Gasoline-Range Petroleum Hydrocarbons[a]	Diesel-Range Petroleum Hydrocarbons[b]	Higher-Range Petroleum Hydrocarbons[b]	Benzene[c]	Toluene[c]	Ethyl-benzene[c]	Total Xylenes[c]	MTBE[c]
~~TB-1~~	1.5	**~~900~~**	<25	**~~580~~**	**3.1**[d]	**45**[d]	**~~34~~**[d]	**199**[d]	<1.2[d]
TB-1	11.0	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
TB-1	26.0	7	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
~~TB-2~~	5.0	**~~170~~**	<25	<50	0.3	0.6	~~1.2~~	~~1.6~~	<0.5
TB-2	20.0	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
~~TB-3~~	5.5	**~~220~~**	<25	<50	**0.91**[d]	~~7.5~~[d]	~~0.4~~[d]	~~9.4~~[d]	<0.12[d]
TB-3	10.5	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
TB-3	20.5	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
TB-4	5.5	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
TB-4	16.0	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
TB-4	25.0	<5	<25	<50	<0.1	<0.1	<0.1	<0.3	<0.5
MTCA Method A Soil Cleanup Level[e]		100 (160)	200 (2000)	200	0.5 (0.03)	40 (7)	20 (6)	20 (9)	0.1[f]

Bold - Detected concentration exceeds the MTCA Method A Soil Cleanup Level
(a) Using the NWTPH-Gx Method
(b) Using the NWTPH-Dx Method
(c) Using EPA Method 8021B
(d) Using EPA Method 8260
(e) Model Toxics Control Act; WAC 173-340-720, Table 1
(f) Proposed value to take effect in August 2000

Table 3

~~Table 3~~

Summary of Soil Sample Detected VOCs and MTCA Metals Analytical Results
in milligrams/kilogram
Phase II Environmental Site Assessment
7201 Portland Avenue, Tacoma, Washington

Sample Location	Sample Depth (feet)	Isopropylbenzene[a]	N-Propyl Benzene[a]	1,3,5-Trimethylbenzene[a]	1,2,4-Trimethylbenzene[a]	S-Butyl Benzene[a]	N-Butyl Benzene[a]	Naphthalene[a]	Arsenic[b]	Chromium[b]	Lead[b]	Mercury[c]
TB-1	1.5	2.8	14	36	110	1.4	3	17	0.8	15	9	0.03
TB-3	5.5	0.29	1.5	3.4	9.9	0.13	0.27	1.4	2.6	10	<1	<0.02
MTCA Method A Soil Cleanup Level[d]		**NV**	**NV**	**NV**	**NV**	**NV**	**NV**	**NV**	**20**	**100**	**250**	**1**
MTCA Method B Soil Cleanup Level[e]		**NV**	**NV**	**NV**	**NV**	**NV**	**NV**	**3,200**	**1.67**	**NV**	**NV**	**24**

Bold - Detected concentration exceeds the MTCA Method A Soil Cleanup Level
(a) Using EPA Method 8260A
(b) Using EPA Method 6010
(c) Using EPA Method 7471
(d) Model Toxics Control Act; WAC 173-340-720, Table 1
(e) From CLARC II Table, February 1996

NV - No Value has been established for this compound