

alexj@epi-wa.com

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November 19, 2002

Mr. Marcel Szyszkowski, P.E.
Toxics Cleanup Program
Southwest Regional Office
Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

Re: UST Removal & Interim Remedial Measures
Safeway Store #1463
7201 Portland Avenue, Tacoma, WA

EPI Project No. 08268.2

Dear Mr. Szyszkowski:

Environmental Partners, Inc. (EPI) would like to provide this response to our telephone conversation on August 19, 2002 and your opinion letter dated August 20, 2002 regarding the above-referenced site on behalf of Safeway, Inc (Safeway). We had previously inquired how we could achieve closure and receive a 'No Further Action' (NFA) letter for the site.

Your first comment was as follows:

"If the remaining contamination is adjacent to or beneath a building or paved surface, or/and is inaccessible, a deed restriction or restrictive covenant may be placed on the property to address the remaining soil and potential groundwater contamination. An NFA with a restrictive covenant can be issued for soils. This restrictive covenant will also require monitoring the ground water at the perimeter of the site. If the soils remain contaminated, they can be addressed when the buildings or paving are removed at some future date. The owner of the site is responsible for filing the restrictive covenant with the local auditor's office. A copy of recorded restrictive covenant would be included with the NFA Letter."

EPI would like to clarify the actions required in order to obtain an NFA for soil on the property. As described in the UST Removal & Interim Remedial Measures report for the property, contaminated soil remains near the north and west borders of the site. Safeway is willing to place a restrictive covenant on the subject property related to these remaining impacts on the fringe of the property; however, because Safeway does not own the right-of-way adjacent to the property to the north and west, they cannot place a restrictive covenant on these off-site properties.

To address the residual soil impacts to the north and west, Safeway can notify Pierce County of the remaining impacts in these areas. EPI will forward to the Washington State Department of Ecology (Ecology) copies of the on-site restrictive covenant and off-site notification letter to Pierce County. We hope that this will be sufficient to obtain an NFA for on-site soils.

Based on site observations during remedial activities at the site and information presented in the UST Removal & Interim Remedial Measures report, it is our opinion that ground water is not an issue at the subject property for the following reasons:

- Ground water was not encountered at the site during two pre-remedial Phase II Environmental Site Assessments to a depth of 36.5 feet below ground surface;
- No static ground water level was observed in the excavation throughout the remedial activities to 13 feet below ground surface;
- The source of water observed in the excavation was the result of: 1) runoff from rainfall over the remediation period (which occurred in January 2002 during a seasonally wet period) and 2) seepage noted near former on-site utility lines and from isolated discontinuous soil lenses;
- At approximately 8 to 10 feet below ground surface, the soil types exhibited a distinct change to a very dense silty sand with gravel (i.e., glacial till-like material) with very low permeability; and
- None of the performance soil samples from the bottom of the on-site remedial excavation (i.e., to 13 feet below ground surface) contained concentrations of petroleum hydrocarbons, benzene, toluene, ethylbenzene, or xylenes exceeding the MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses. These soil cleanup levels were developed by Ecology, using conservative assumptions, to be protective of ground water quality.

For these reasons, it does not appear that the installation of ground water monitoring wells on the subject property is an appropriate or necessary action. Please provide us your insight and comments regarding these issues, and do not hesitate to contact us with any questions or concerns at (425) 889-4747.

Sincerely,



Alex Jones
Project Engineer

cc: Mr. Jeff Brown; Safeway, Inc.

Szyszkowski, Marcel

From: Szyszkowski, Marcel
Sent: Wednesday, June 04, 2003 5:04 PM
To: 'Alex Jones'
Cc: Cline, Chuck; 'rolsen@tpchd.org'
Subject: RE: Safeway 1463

Alex, as I indicated Ecology's goal is to work with the PLP (s), especially in the VCP, and drive the process toward the NFA. We talked this morning and I was under impression that Safeway Inc. is interested in obtaining a closure for the site. If that is the case then we all are on the same page.

Going further, as you probably noticed the point of my e-mail of February 18, 03 to you was to provide you with my idea how to drive towards the closure.

So, I am just wondering what had been done so far towards that goal, and why we have an impression of inactivity for the site.

Sorry, that I am not directly addressing your question, but I thought Safeway Inc. did not spent much money any more. But they must work with the community to make things happen. Please let me know if I can be of any further help.

Marcel Szyszkowski, P.E.
Ecology Site Manager
(360) 407-6363

-----Original Message-----

From: Alex Jones [mailto:alexj@epi-wa.com]
Sent: Wednesday, June 04, 2003 4:41 PM
To: Szyszkowski, Marcel
Subject: RE: Safeway 1463

Hi Marcel,

Just a quick response to your e-mail message below (which I have forwarded to my supervisor)...

We are consulting with our client now regarding future actions for property. It is my understanding that our client may have some difficulty in allocating funds to address this site in this difficult economy, especially because the current data from the past remedial action at the site suggest to us and them that no remediation is required and the site does not pose a threat to human health or the environment.

If no action is taken by the property owner in this case, will the site fall out of the VCP entirely and simply be placed on the appropriate regulatory lists? If not, what happens to the site in this circumstance?

Thanks,

Alex Jones
Project Engineer
Environmental Partners, Inc.