



September 14, 2023

Mr. Tim Mullin
VCP Site Manager
Toxics Cleanup Program – Southwest Region Office
Washington State Department of Ecology

RE: Cleanup Status Report
U-Haul Facility No. 881090 / Former Church of God in Christ Facility
9201 Pacific Avenue South
Tacoma, Washington 98444
Atlas Project No. 1052109003
Washington Department of Ecology Facility No.: 19947
Washington Department of Ecology VCP Project No.: SW1531
Washington Department of Ecology Cleanup Site ID No.: 12404

Dear Mr. Mullin:

Atlas Technical Consultants (Atlas, previously known as ATC) is pleased to provide this written update to Washington State Department of Ecology (Ecology) on behalf of AMERCO Real Estate Company (AREC) for the above referenced facility, located at 9201 Pacific Avenue South in Tacoma, Washington (Site). The objective of this letter is to provide information on the status of cleanup as requested by Ecology in a letter dated August 15, 2023.

SITE DESCRIPTION AND BACKGROUND

The Site is approximately 8.9 acres with 670 feet of frontage on Pacific Avenue South, approximately 1,000 feet north of the 96th Street intersection. The subject Site is at an approximate elevation of 385 feet above mean sea level. Pierce County Assessor's Office identifies the subject Site as Tax Parcel Number 032033-3- 309. The rectangular-shaped parcel includes one centrally located approximate 61,419 square foot single-story brick/block walled commercial building surrounded by a primarily asphalt surfaced parking lot. Pacific Avenue South bounds the subject Site to the west; mixed light commercial and residential use is predominant to the north, east (beyond A Street South), and west (beyond Pacific Avenue South). The south adjoining property is vacant land; mixed light commercial and residential use extends beyond the vacant lot.

A previous Phase I Environmental Site Assessment (ESA; Andersen Environmental [Andersen], 2014, performed for Welles Rinning) indicated that the subject Site was developed as a commercial nursery as early as 1941 through at least 1965. In circa 1965, the subject Site was redeveloped as a strip mall known as the Pacific Center and functioned in this capacity through 1997. Tenants within the strip mall included the Pacific Launder Center (from 1965 through at least 1974) and the Tacoma Dry Cleaning & Laundry Center (from as early as 1979 through at least 1984). The dry cleaners reportedly operated in the north end of the building. The subject Site was reportedly purchased by the Church of God in Christ in 1999 and was operated as a place of worship/religious convention center with a child daycare facility through 2013, when the property was transferred into receivership. Andersen identified the former dry cleaning operations

as a *recognized environmental condition* and recommended a Phase II ESA to address potential impacts.

Andersen performed Phase II subsurface investigations in December 2014 and March 2015, which included drilling a total of 13 soil borings to depths ranging between seven and 21 feet below ground surface (bgs; [Andersen, 2015]). Five borings (B7 through B11) were advanced through the foundation inside the north end of the building to facilitate collection of soil samples; groundwater grab samples were collected at borings B7 and B9. Eight additional borings (B1 through B6, B12 and B13) were advanced in the parking lot northwest, north and northeast of the building to facilitate collection of soil samples; groundwater grab samples were collected at borings B5 and B12. Four of the exterior boring locations were completed as permanent groundwater monitor wells (B1, B3, B6 and B13 were completed as MW1, MW2, MW3 and MW4, respectively); the wells were constructed with a five-foot screen interval extending to a maximum depth of 19 feet bgs. The boring logs indicated that first encountered groundwater occurred between 14 and 17 feet bgs, with static water levels in the completed wells ranging between 8.7 and 14.4 feet below top of well casing (suggesting a confined or semi-confined aquifer). Soil was described as predominantly un-weathered glacial till consisting of outwash gravel, sand and surficial loam to the maximum extent explored (21 feet bgs). The underlying hydrogeologic unit at the subject Site is classified as Quaternary Vashon Till (Qvt), a semi-confining unit consisting of a grey, unsorted, highly-compact mixture of clay, silt, sand, and gravel with occasional glacial erratics that extends to an approximate depth of 325 feet above mean sea level (United States Geological Survey [USGS], 1999). The 2015 Phase II incorporated the findings of an earlier (but previously unavailable) limited subsurface investigation conducted by Environmental Associates, Inc. (EA, 2013) which included soil and groundwater grab sampling and analyses at six borings (B-1 through B-6). Soil and groundwater laboratory analytical data obtained during both Phase II investigations quantified chlorinated volatile organic compounds (VOCs) commonly associated with dry cleaning operations, including trichloroethene (TCE) and tetrachloroethene (PCE) at concentrations exceeding Model Toxics Control Act (MTCA) Method A cleanup levels.

Based on the data, Andersen concluded that the TCE and PCE concentrations in soil did not represent a significant risk to human health. Regarding the groundwater, Andersen concluded that monitored natural attenuation (MNA) was a feasible option based on the concentrations, groundwater flow direction (generally toward the north) and the absence of sensitive receptors in the vicinity of the dissolved phase plume. Andersen recommended three additional quarters of groundwater monitoring and sampling to establish groundwater elevation and flow direction trends and to monitor concentrations of chemicals of concern. The subject Site was purchased by AREC at auction in January 2016. Based on a brief review of the 2015 Andersen Phase II report, AREC believed that the apparently limited environmental risks would be sufficiently addressed by the suggested MNA groundwater sampling schedule. Following acquisition, AREC requested ATC to evaluate the Phase II reports and execute the proposed scope of work, or develop an alternative approach as needed. Following a review of the 2015 Andersen Phase II report by ATC, several data gaps were noted, including the absence of a soil vapor survey. An investigative search in Ecology's intranet database (Fortress) yielded a Further Action opinion letter addressed to Andersen and dated August 26, 2015. Per the Ecology correspondence, Andersen had requested an opinion for their proposed independent cleanup of the Church of God in Christ facility, which had an Ecology assigned Voluntary Cleanup Program (VCP) project number. The opinions presented by Ecology were based on the 2013 limited

subsurface investigation, the 2014 Andersen Phase I report and the 2015 Andersen Phase II report.

Following a discussion with the VCP Case Manager in April 2016, ATC submitted a VCP application (to re-assign the designated party from Andersen to AREC). In correspondence dated June 8, 2016, Ecology notified AREC that their VCP application had been accepted (with the original Church of God in Christ retained as the VCP site name).

RECENT INVESTIGATION AND REMEDIATION ACTIVITIES BY ATC

2017 – ATC Site Characterization

In January of 2017, ATC Group Services LLC (ATC) performed Site characterization activities outlined in the Site Characterization Work Plan, dated October 4, 2016. Site characterization activities included an indoor air quality survey, sub-slab and soil vapor investigation, and well installation (MW-5). Following completion of site characterization activities, ATC conducted one quarter of groundwater monitoring activities.

2020-2021 – ATC Atlas Groundwater Monitoring Activities

ATC Atlas performed two groundwater monitoring and sampling events in December of 2020 and March of 2021.

REGULATORY STATUS

The Site is currently enrolled in Ecology's VCP and has been assigned VCP No. SW1531.

ADDITIONAL INVESTIGATION PROPOSED WORK

On October 16, 2016, ATC submitted a Site Characterization Work Plan (Work Plan) to Ecology requesting an opinion on the need for additional remedial action at the Site. On April 7, 2017 Ecology issued an opinion letter based on its review of the document and determined that upon completion of the proposed cleanup, further remedial action will likely be necessary. On August 15, 2023, Ecology issued a request for information on status of the VCP project. In their request for information letter, dated August 15, 2023, Ecology requested the *following information*. *Each request is followed by Atlas' response:*

- *Requested Item No. 1: Within 30 days of receipt of this letter, please provide a written update to Ecology. If a new Site cleanup report has been generated, submit one hard copy and one electronic copy.*

Atlas response: This letter serves as Atlas' written update to Ecology, in response to Ecology's Project Status Request letter, dated August 15, 2023. In 2017, ATC completed Site characterization activities outlined in ATC's Work Plan dated October 4, 2016. ATC conducted the subsurface investigation, sub-slab and soil vapor assessment, and indoor air quality assessment. ATC then conducted one quarter of groundwater monitoring and sampling in February 2017. No remedial activities were performed between 2017 and 2020. Atlas then conducted two groundwater monitoring and sampling events (December 2020 and March

2021) in order to characterize current groundwater conditions at the Site. Since the completion of groundwater monitoring activities in 2021, personnel changes and turnover have taken place within Atlas and AREC, which have led to temporary inactivity at the Site. Atlas has appointed a new point of contact (see response to Requested Item No. 2) to follow through with conducting additional remedial activities as indicated in Ecology's Opinion letter dated April 7, 2017. Atlas will also generate a compiled report summarizing remedial activities that have taken place at the Site from January 2017 to present.

- **Requested Item No. 2: If any contact information has changed for the VCP customer team, please fill out the enclosed VCP change of contact form.**

Atlas response: The new point of contact for this Site is Ms. Brianne Goulet of our Seattle, Washington office. Ms. Goulet is a registered geologist in the State of Washington with field experience at the Site. A completed "Change of Contact Form" is attached to this letter report. In addition, for redundancy and to mitigate loss of contact, we have included Mr. Robert Petrisko as a point of contact in our Arizona office.

- **Requested Item No. 3: Required electronic data.** Please ensure that all environmental Site data collected since August 1, 2005, are accepted into Ecology's Environmental Information Management (EIM) system database. Ecology's current data submittal requirements are provided in Toxics Cleanup Program Policy 840.

Atlas response: Atlas will review all environmental Site data collected since August 1, 2005 and confirm if the data has been uploaded to the EIM system database. Any missing data will be added to the EIM database by December 2023.

Atlas intends to conduct groundwater monitoring and sampling events in the fourth quarter of 2023 and first quarter of 2024. Each groundwater monitoring event is anticipated to take one day. The samples will be submitted to the laboratory on standard turn-around time. After receipt of the final analytical reports, all results from January 2017 forward will be summarized in a draft report. The draft report will also include a proposed Work Plan to further characterize the Site, as requested by Ecology in their opinion letter dated April 7, 2017. The draft report will be submitted to AREC for review, then, after incorporating any comments, will be submitted to Ecology. The report will document soil/groundwater impacts encountered during the January 2017 soil boring/well installation, indoor air quality survey and sub-slab and soil-vapor assessment activities and subsequent groundwater monitoring events. Conclusions regarding the results of the field activities will be included in the report. The report will include tables, maps, figures, field notes (where appropriate), and appendices pertinent to the data collected during the field activities. The report will be prepared and signed by a Washington-licensed professional geologist or engineer. Atlas anticipates delivering the compiled report to Ecology by June of 2024.



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Atlas appreciates the opportunity to be of service in this matter. If you have questions regarding this Clean Status report, please contact Brianne Goulet at (206) 498-9528.

Sincerely,

Atlas Technical Consultants

A handwritten signature in blue ink that reads "B. Goulet".

Brianne Goulet, L.G.
Project Manager
Brianne.Goulet@oneatlas.com
206.498.9528

A handwritten signature in blue ink that reads "Robert J. Petrisko".

Robert J. Petrisko
Client Manager, Principal
Robert.Petrisko@oneatlas.com
480.355.4624

Enc: Attachment 1 – Change of Contact Form

cc: Haley Ziesemer, AMERCO Real Estate Company (AREC)



Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

CHANGE OF CONTACT FORM

Use this form to notify the Department of Ecology (Ecology) of any changes to the designated points of contact for a project under the Voluntary Cleanup Program (VCP). Include any changes to the contact information for those persons (for example: phone number or address). Please submit only one form for each point of contact.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are providing new contact information. This information may be found on the VCP Agreement.

Facility/Site Name: U-Haul Facility No. 881090 / Former Church of God in Christ Facility

Facility/Site Address: 9201 Pacific Avenue South Tacoma, Washington

Facility/Site No: 19947

VCP Project No.: SW1531

Step 2: IDENTIFY CONTACT PERSON

Please identify the role of the person for whom you are providing new contact information. Check all that apply.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Project Manager | <input type="checkbox"/> Project Attorney |
| <input type="checkbox"/> Project Billing Contact | <input type="checkbox"/> Property Owner |
| <input type="checkbox"/> Project Consultant | <input type="checkbox"/> Other – please specify: |

Please provide below the new contact information for this person:

Name: Brianne Goulet

Title: Project Geologist

Organization: Atlas Technical Consultants

Mailing address: 6347 Seaview Avenue NW

City: Seattle

State: WA

Zip code: 98107

Phone: 206.498.9528

Fax:

E-mail: Brianne.Goulet@oneatlas.com

Effective date: 08/31/2023

Step 3: IDENTIFY PRIOR CONTACT PERSON (IF APPLICABLE)

Is the new contact person replacing an existing point of contact?

Yes

No

If you answered "YES" above, please identify below the person who is being replaced:

Name: Edwin Vandegrift

Title: Principal Geologist

Organization: Atlas Technical Consultants

Mailing address: 9185 South Farmer Avenue, Suite 111

City: Tempe

State: AZ

Zip code: 85284

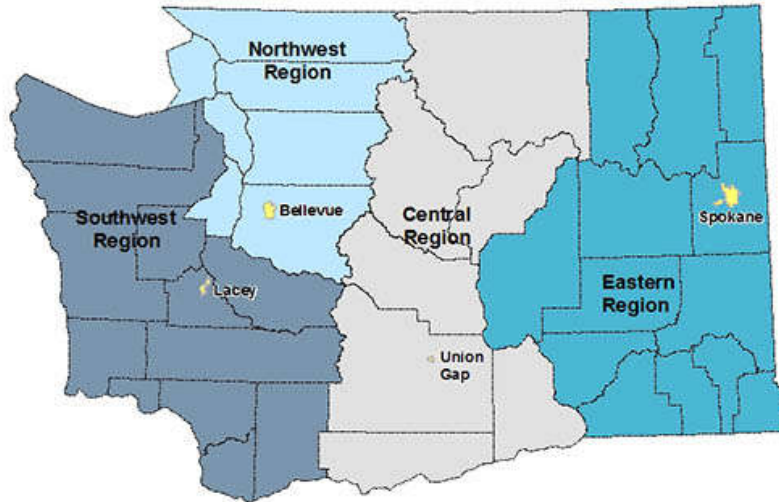
Phone: 602.321.0558

Fax:

E-mail: Edwin.vandegrift@oneatlas.com

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



<p>Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452</p>	<p>Central Region: Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009</p>
<p>Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775</p>	<p>Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295</p>

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call 877-833-6341.