



November 6, 2023

Frank P. Winslow
Washington State Department of Ecology
1250 West Alder Street
Union Gap, Washington 98903

**RE: SCOPE OF WORK FOR OFF-PROPERTY SUBSURFACE INVESTIGATION
FORMER WASHINGTON COLD STORAGE BUILDING
240 15TH STREET SOUTHEAST
PUYALLUP, WASHINGTON
FARALLON PN: 2636-001**

Dear Frank Winslow:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to present the scope of work for an off-property subsurface investigation to be conducted in support of the remedial investigation for the property at 240 15th Street Southeast in Puyallup, Washington (herein referred to as the Former Washington Cold Storage Property). The Former Washington Cold Storage Property currently is enrolled in the Washington State Department of Ecology (Ecology) Expedited Voluntary Cleanup Program (VCP) and has been assigned VCP Project ID No. XS0012.

Farallon recently submitted a Remedial Investigation/Focused Feasibility Study and Cleanup Action Plan (RI/FFS-CAP)¹ to support planned redevelopment and cleanup activities at the Former Washington Cold Storage Property. Following review of Farallon's RI/FFS-CAP and PFAS evaluation, Ecology issued an opinion² that upon completion of the cleanup action proposed in Farallon's RI/FFS-CAP, no further action will likely be necessary to clean up contamination at the Former Washington Cold Storage Property. However, Ecology stipulated that issuance of a No Further Action determination would be dependent on defining the down-gradient extent of petroleum hydrocarbons and halogenated volatile organic compounds (HVOCs) in groundwater.

¹ Farallon. 2023. *Remedial Investigation/Focused Feasibility Study and Cleanup Action Plan, Former Washington Cold Storage Building, 240 15th Street Southeast, Puyallup, Washington*. May 12.

² Ecology. 2023. Letter Regarding Opinion on Proposed Cleanup of a Property Associated with the following Site: Washington Cold Storage, 240 15th Street Southeast, Puyallup, Pierce County, Washington 98372 Frank Winslow. To Brady Thomson, CREF3 Puyallup Owner LLC. July 19.



The off-property subsurface investigation will be conducted at the north-adjoining property at 1416 East Main Street (Pierce County Parcel No. 7845100301). The north-adjoining property comprises 2.7 acres of land and currently is developed with a one-story 20,000-square-foot commercial retail building (Building 1) and a one-story 9,120-square-foot commercial retail building (Building 2), both constructed in 1994. The buildings on the north-adjoining property currently are occupied by various retail tenants, including an auto body shop, an auto parts store, and salons.

The proposed off-property subsurface investigation will be conducted to evaluate whether petroleum hydrocarbons and HVOCs from the Former Washington Cold Storage Property are migrating onto the north-adjoining property in groundwater and/or soil gas.

SCOPE OF WORK

The subsurface investigation on the north-adjoining property will consist of installing up to two groundwater monitoring wells north of Building 1 for collection of soil and groundwater samples, and conducting a vapor intrusion assessment, including installation of a single subslab soil gas probe south of Building 1, to evaluate whether there is a risk of vapor intrusion into Building 1 on the north-adjoining property. The sampling locations are shown on Figure 1.

ACCESS AGREEMENT

Farallon assumes that an access agreement will be required to conduct the subsurface investigation on the north-adjacent property. This scope of work will not begin until Farallon receives approval from Fortress.

MONITORING WELL INSTALLATION

Prior to drilling, Farallon will retain public and private utility locating services to identify the locations of subsurface utilities. Each boring will be manually cleared to a depth of 5 feet below ground surface (bgs) using an air knife to verify that no utilities are present. The existing property-specific Health and Safety Plan will be updated to include the scope of work for the north-adjoining property as required by Part 1910 of Title 29 of the Code of Federal Regulations and Chapter 296-62 of the Washington Administrative Code.

Monitoring wells will be installed at the approximate locations shown on Figure 1 by a Washington State-licensed drilling contractor using a direct-push drill rig to depths of approximately 15 feet bgs, depending on the depth to first-encountered groundwater.



A Farallon geologist will observe subsurface conditions during drilling and will record observations on boring logs, including soil types encountered, visual and olfactory evidence of soil contamination, and qualitative measurement of volatile organic vapors in soil using a photoionization detector. Soil samples will be collected for potential laboratory analysis at approximately 5-foot intervals, with additional samples collected if evidence of contamination is encountered. Soil samples retained for laboratory analysis will be transported to Apex Laboratories of Tigard, Oregon (Apex) under standard chain-of-custody protocols for analysis of one or more of the following:

- Total petroleum hydrocarbons as gasoline-range organics (GRO) by Northwest Method NWTPH-Gx;
- Total petroleum hydrocarbons as diesel- and oil-range organics (DRO and ORO) by Northwest Method NWTPH-Dx; and
- Volatile organic compounds (VOCs) by U.S. Environmental Protection Agency (EPA) Method 8260D.

Upon reaching total depth, monitoring wells will be constructed using 10 feet of prepacked 0.010-inch slotted screen placed to intersect the surface of the first-encountered groundwater-bearing zone. A bentonite seal will be installed above the filter pack, and the borings will be backfilled to ground surface with a concrete mix. Each monitoring well will be completed with a watertight locking cap and flush-mounted traffic-rated well monument.

The new monitoring wells will be developed by the drilling contractor using surging and purging techniques until water purged from the wells appears clear. The new monitoring wells will be professionally surveyed for location and elevation by a Washington State-licensed surveyor.

GROUNDWATER MONITORING EVENT

Following installation and development of the new monitoring wells, Farallon will conduct a groundwater monitoring event, including measuring groundwater elevations at all monitoring wells and collecting groundwater samples from the newly installed monitoring wells on the north-adjointing property and at existing monitoring wells MW-01, MW-07, FMW-08 through FMW-10, and FMW-16 on the Former Washington Cold Storage Property, to evaluate current groundwater conditions along the northern boundary of the Former Washington Cold Storage Property and beneath the north-adjointing property.



Farallon field personnel will remove the locking well cap from each monitoring well and allow groundwater levels to equilibrate to atmospheric pressure for at least 20 minutes. The depth to groundwater will be measured to the nearest 0.01 foot using a water level meter from the top of the well casing. Reusable equipment will be decontaminated between each location.

Groundwater samples will be collected from the monitoring wells in accordance with standard EPA low-flow groundwater sampling procedures. During purging, temperature, pH, specific conductance, dissolved oxygen, oxidation-reduction potential, and turbidity will be monitored to determine when stabilization of these parameters occurs. Following stabilization of the parameters, groundwater samples will be collected directly from the low-flow pump outlet. Groundwater samples will be transported to Apex under standard chain-of-custody protocols for analysis of the following:

- GRO by Northwest Method NWTPH-Gx;
- DRO and ORO by Northwest Method NWTPH-Dx; and
- VOCs by EPA Method 8260D.

VAPOR INTRUSION ASSESSMENT

The vapor intrusion assessment will include collection of a single subslab soil gas sample immediately south of Building 1 on the north-adjointing property to evaluate the potential of vapor intrusion into Building 1 in accordance with Ecology's Vapor Intrusion Guidance.³ According to Ecology's Vapor Intrusion Guidance, petroleum hydrocarbons and halogenated VOCs may be present in soil and/or groundwater within the recommended horizontal separation distance from the building on the north-adjointing property at concentrations exceeding the threshold where a vapor intrusion assessment is warranted.

A permanent subslab soil gas probe will be installed using hand tools proximate to the building on the north-adjointing property, at the approximate location shown on Figure 1. Following installation of the probe, Farallon will collect a subslab soil gas sample in accordance with Ecology's Vapor Intrusion Guidance. The soil gas sample will be collected in a 1-liter Summa canister and transported to Freidman & Bruya, Inc. of Seattle, Washington for analysis of air-phase hydrocarbons by Method MA-APH and VOCs by EPA Method TO-15. Analytical results from the soil gas sample will be compared to Washington State Model Toxics Control Act Cleanup Regulation Method B subslab soil gas screening levels for

³ Ecology. 2009. *Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action*. Revised March 2022. January (Vapor Intrusion Guidance).



commercial exposure to evaluate whether the risk of vapor intrusion exists for the commercial retail building on the north-adjointing property.

INVESTIGATION-DERIVED WASTE

Investigation-derived wastes, including soil cuttings, decontamination water, purge water, and other wastewater generated during the supplemental subsurface investigation will be temporarily stored on the Former Washington Cold Storage Property in labeled 55-gallon steel drums.

Farallon will use soil and groundwater data from the subsurface investigation to coordinate with a waste disposal contractor to profile, transport, and dispose of investigation-derived waste generated during subsurface investigation activities.

CLOSING

Farallon appreciates the opportunity to provide environmental consulting services for this project. Please contact either of the undersigned at (425) 295-0800 if you have questions or need additional information.

Sincerely,

Farallon Consulting, L.L.C.

Yusuf Pehlivan, L.G.
Associate Geologist

Pete Kingston, L.G.
Principal Geologist

Attachment: Figure 1, *Property Plan with Proposed Sampling Locations*

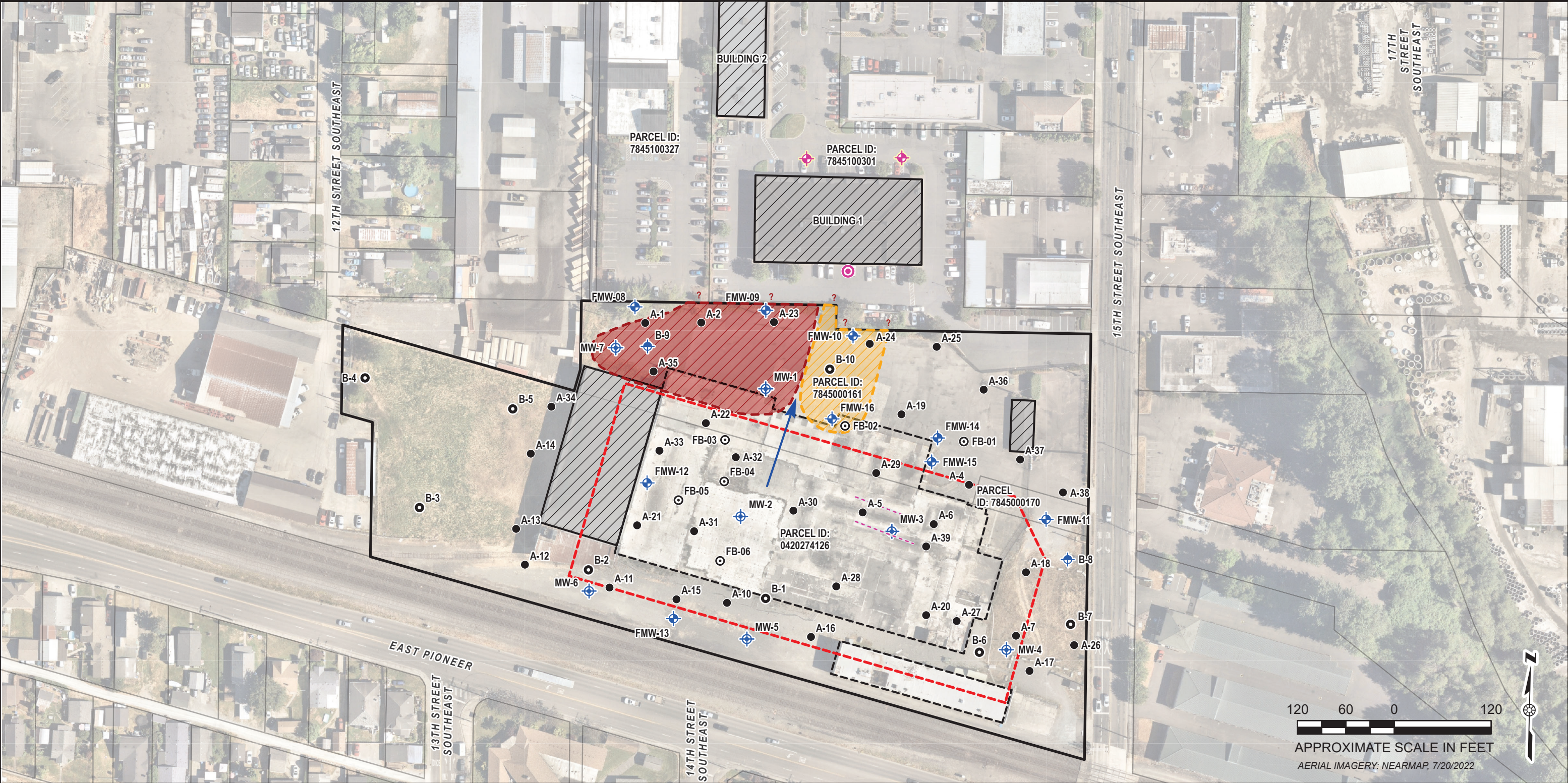
cc: Ryan Deri, CREF3 Puyallup Owner, LLC
Kaileigh Flanagan, CREF3 Puyallup Owner, LLC
Brady Thomson, CREF3 Puyallup Owner, LLC

YP/PK:cm

FIGURE

SCOPE OF WORK FOR OFF-PROPERTY SUBSURFACE INVESTIGATION
Former Washington Cold Storage Building
240 15th Street Southeast
Puyallup, Washington

Farallon PN: 2636-001



LEGEND

- | | | | | | | | | | |
|--|----------------------------------------|--|---------------------------------|--|-----------------------------------------|--|-----------------------------------------------------------|--|---------------------------------------|
| | PROPOSED MONITORING WELL | | GEOTECHNICAL WELL (TERRA 2021) | | BORING (ATLAS 2021, 2022) | | ESTIMATED EXTENT OF PETROLEUM HYDROCARBONS IN GROUNDWATER | | EXISTING BUILDING |
| | PROPOSED SUBSLAB SOIL GAS PROBE | | MONITORING WELL (ATLAS 2021) | | BORING (FARALLON 2023) | | FORMER BUILDING | | APPROXIMATE SUBJECT PROPERTY BOUNDARY |
| | APPROXIMATE GROUNDWATER FLOW DIRECTION | | MONITORING WELL (FARALLON 2023) | | BORING (TERRA ASSOCIATES 2022) | | PROPOSED BUILDING | | PIERCE COUNTY PARCEL BOUNDARIES |
| | FORMER TRENCH DRAINS | | | | ESTIMATED EXENT OF HVOCS IN GROUNDWATER | | | | |

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

 FARALLON CONSULTING Your Challenges. Our Priority. farallonconsulting.com	Washington Issaquah Bellingham Seattle Oregon Portland Baker City California Oakland Irvine	FIGURE 1 PROPERTY PLAN WITH PROPOSED SAMPLING LOCATIONS WASHINGTON COLD STORAGE 240 15TH STREET SOUTHEAST PUYALLUP, WASHINGTON	
	DRAWN BY: VBACHMANN		CHECKED BY: YP