



December 20, 2023

Mr. Tim Mullin, LHG  
Washington State Department of Ecology – Southwest Regional Office  
Toxics Cleanup Program  
PO Box 47775  
Olympia WA, 98504

**Re: VCP Project Status Request for Morrells Dry Cleaners Site (VCP #SW1039)**  
Project No. AS080190

Dear Mr. Mullin:

This letter has been prepared to provide an update on the status of remedial activities at the Morrells Dry Cleaner Site (Site) located at 608 North First Street in Tacoma, Washington. The Site is currently enrolled in the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program (VCP) as project SW1039. This letter serves as a response to your request for information on project status dated December 12, 2023.

Work completed at the Site in 2022 and 2023 was in accordance with the Sitewide Remedial Investigation (RI)/ Feasibility Study (FS) Work Plan (Aspect, 2021) and modified per Ecology requests contained in the Further Action Opinion Letter (Ecology, 2021), a technical meeting conducted between Aspect and Ecology on September 29, 2021, and follow-up email communication dated November 11, 2021 (Appendix A). As previously documented, the Site includes soil and groundwater primarily impacted by chlorinated solvents from historical dry cleaning operations. Previous remediation work at the Site has included a biostimulation injection, a reduction/bioaugmentation injection pilot test, and ongoing operation of a soil vapor extraction (SVE) system that also serves as a subslab depressurization system for the Morrell's building. Ongoing activities include implementation of the Sitewide RI/FS Work Plan to complete Site characterization and eventual evaluation of remedial actions via a FS. An update on these Site characterization activities completed in 2022 and 2023 is provided below.

## **Monitoring Well Installation with Soil Sampling**

In accordance with the November 2, 2021, email (Appendix A), three new monitoring wells were installed in 2022 and 2023. Monitoring well locations are included on Figure 1. MW-36 is located hydraulically upgradient from MW-33 beyond the extents of the advance outwash groundwater. MW-37 is located hydraulically upgradient from MW-27/28. MW-15D is located downgradient from the advance outwash groundwater impacts, screened in the deeper aquifer. Soil samples were collected from borings drilled for monitoring well installation, included in Table 1.

## **Groundwater Monitoring**

An additional groundwater sampling event was performed to monitor advance outwash and deeper water-bearing zone water quality for both chlorinated solvents and monitored natural attenuation geochemical parameters. The groundwater sampling occurred in July 2023. Groundwater quality data is included in Tables 2, 3, and 4.



## **Off-Property Vapor Intrusion Investigation**

The remaining outstanding data gap identified in the Further Action Opinion Letter is the off-Property vapor intrusion risk. We have been working with the Client's environmental attorney to obtain access agreements with the northern property owners (4 The Boys Company, LLC, and Stadium, LLC) to collect subslab soil gas samples. This work will be completed once access agreements are obtained.

## **Sitewide Remedial Alternatives Evaluation**

We are currently reviewing the feasibility of additional remedial actions to address source-area contamination at the Site to the maximum extent practicable. Remedial options may include a combination of ex situ (e.g., soil excavation and off-Site disposal) and in situ (e.g., thermal or SVE) components to remove chlorinated solvents from the source area. This evaluation is pending completion of the RI by conducting a vapor intrusion evaluation on northern properties impacted by the Site. However, the FS is anticipated to be completed and submitted to Ecology with a request for opinion in 2024.

## Limitations

Work for this project was performed for the Thriftway Properties LLC (Client), and this letter was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This letter does not represent a legal opinion. No other warranty, expressed or implied, is made.

All reports prepared by Aspect Consulting for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Aspect Consulting. Aspect Consulting's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

Sincerely,

Aspect consulting



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Senior Engineer  
Breeyn.greer@aspectconsulting.com

A handwritten signature in black ink that reads "Jeremy J. Porter".

**Jeremy Porter, PE**  
Senior Principal Remediation Engineer  
Jeremy.porter@aspectconsulting.com

- Attachments:
- Table 1 – Soil Quality
  - Table 2 – Advance Outwash Groundwater Quality
  - Table 3 – Advance Outwash Groundwater Natural Attenuation Parameters
  - Table 4 – Groundwater Quality and Natural Attenuation Parameter, Deeper Water Bearing Zones
  - Figure 1 – Site Plan
  - Appendix A – Ecology email communication dated November 2, 2021

cc: Tony Wickham, Thriftway Properties, LLC

Karen Gillmer, Thriftway Properties, LLC

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# **TABLES**

# Table 1. Soil Quality

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Sample Location	Sample Date	Sample Depth (feet bgs)	Tetrachloroethene (PCE)	Trichloroethene (TCE)	Naphthalene
PB-2	8/31/06	4	0.16	0.02 U	0.05 U
PB-3	8/31/06	8	0.16	0.02 U	0.05 U
A-5	2/26/19	22.5	0.025 U	0.02 U	0.05 U
		32	0.025 U	0.02 U	0.05 U
A-6	2/27/19	13	0.47	0.02 U	0.05 U
		36	0.025 U	0.02 U	0.05 U
	2/28/19	57.5	0.025 U	0.02 U	0.05 U
A-7	2/28/19	9.5	1.4	0.16	0.05 U
		22	120	1.5	0.44
	3/1/19	37	0.025 U	0.02 U	0.05 U
A-8	2/26/19	14	0.089	0.02 U	0.1
		34	7.3	0.15	0.05 U
	2/27/19	47	0.047	0.02 U	0.05 U
AB-1	12/20/13	15	--	--	0.05 U
		25	--	--	0.05 U
		45	--	--	0.05 U
		61.5	--	--	0.05 U
AB-2	4/6/15	16.5	0.025 U	0.02 U	0.12
AB-2D	3/4/16	10	0.025 U	0.02 U	0.05 U
		15	0.025 U	0.02 U	0.05 U
		27.5	0.025 U	0.02 U	0.05 U
		37.5	0.025 U	0.02 U	0.05 U
		52.5	0.025 U	0.02 U	0.05 U
AB-3	4/6/15	16.5	0.025 U	0.02 U	0.77
AB-4	4/6/15	16.5	0.025 U	0.02 U	
B-1	06/29/07	0-2	0.04	0.02 U	--
		2-3	0.04	0.02 U	--
B-10	02/25/16	4.5	0.025 U	0.02 U	0.05 U
B-11	02/25/16	5.5	0.16	0.04 U	0.1 U
B-12	02/25/16	5	0.025 U	0.02 U	0.05 U
		9	0.025 U	0.02 U	0.05 U
B-14	02/25/16	4.5	0.025 U	0.02 U	0.05 U
		5.5	0.025 U	0.02 U	0.05 U
		10.5	0.025 U	0.02 U	0.05 U
B-15	02/25/16	6.5	0.025 U	0.02 U	0.05 U
B-16	02/25/16	6	0.025 U	0.02 U	0.05 U
B-17	05/11/16	2	0.025 U	0.02 U	0.05 U
B-18	05/11/16	3	0.025 U	0.02 U	0.05 U
B-19	05/11/16	6	0.025 U	0.02 U	0.05 U
B-20	05/11/16	4.5	0.025 U	0.02 U	0.05 U
B-21	05/11/16	9.5	0.025 U	0.02 U	0.23
DC1	08/31/06	8	0.02 U	0.02 U	0.05 U
DP-1	10/21/10	1	2.1	0.03 U	0.05 U
		2	1	0.03 U	0.05 U
DP-2	10/21/10	1	0.8	0.03 U	0.05 U
DP-4	10/20/10	2	1.8	0.03 U	0.05 U
DP-5	10/20/10	3	1.4	0.03 U	0.05 U
		6	0.54	0.03 U	0.05 U

# Table 1. Soil Quality

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Sample Location	Sample Date	Sample Depth (feet bgs)	Tetrachloroethene (PCE)	Trichloroethene (TCE)	Naphthalene
DP-7	10/21/10	2	2.7	0.03 U	0.05 U
		2.5	36	0.14	0.05 U
DP-8	10/20/10	3	0.025 U	0.03 U	28
		4.5	0.025 U	0.03 U	0.22
DP-9	10/20/10	3	0.025 U	0.03 U	0.05 U
		6	0.13	0.03 U	0.05 U
DP-10	02/08/12	8.5	0.24	0.03 U	0.05 U
DP-12	02/08/12	5.5	0.025 U	0.03 U	0.05 U
DP-13	02/08/12	7	0.025 U	0.03 U	0.05 U
DP-14	02/08/12	7	0.025 U	0.03 U	0.05 U
F-12	07/31/07	1	1.5	0.02 U	--
F-20	07/31/07	1.7	2.1	0.02 U	--
MW-9	05/11/09	Composite	0.025 U	0.03 U	0.05 U
MW-10	05/11/09	Composite	0.025 U	0.03 U	0.05 U
MW-11	05/11/09	Composite	0.025 U	0.03 U	0.05 U
MW-21	10/11/13	11	0.63	0.03 U	0.05 U
		15.5	44	0.57	0.05 U
		25	0.025 U	0.03 U	0.05 U
		40	0.025 U	0.03 U	0.05 U
		55	0.095	0.032	0.05 U
MW-23 <sup>3</sup>	02/06/19	5.5	0.025 U	0.02 U	0.05 U
		10.5	0.4	0.18	0.05 U
		20.5	0.045	0.02 U	0.05 U
		25.5	2.3	0.02 U	0.05 U
		55.5	0.095	0.02 U	0.05 U
MW-24	1/30/19 & 1/31/19	5.5	0.025 U	0.02 U	0.05 U
		30.5	0.025 U	0.02 U	0.05 U
		50.5	0.025 U	0.02 U	0.05 U
MW-25	1/28/19 & 1/29/19	5.5	0.025 U	0.02 U	0.05 U
		30.5	0.025 U	0.02 U	0.05 U
		50.5	0.025 U	0.02 U	0.05 U
MW-26	1/29/19 & 1/30/19	5.5	0.025 U	0.02 U	0.05 U
		30.5	0.025 U	0.02 U	0.05 U
		50.5	0.025 U	0.02 U	0.05 U
MW-27	1/31/19 & 2/1/19	5.5	0.025 U	0.02 U	0.05 U
		30.5	0.025 U	0.02 U	0.05 U
		50.5	0.025 U	0.02 U	0.05 U
MW-28	03/14/19	30.5	0.038	0.02 U	0.05 U
		55.5	0.025 U	0.02 U	0.05 U
MW-29	03/11/19	15	0.043	0.02 U	0.05 U
		50	0.043	0.02 U	0.05 U
MW-30	02/07/19	10.5	0.084	0.021	0.05 U
		35.5	0.1	0.02 U	0.05 U
		60.5	0.026	0.02 U	0.05 U

# Table 1. Soil Quality

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Sample Location	Sample Date	Sample Depth (feet bgs)	Tetrachloroethene (PCE)	Trichloroethene (TCE)	Naphthalene
MW-31	02/05/19	5.5	0.025 U	0.02 U	0.05 U
		40.5	0.025 U	0.02 U	0.05 U
		55.5	<b>0.058</b>	0.02 U	0.05 U
		60.5	<b>0.058</b>	0.02 U	0.05 U
MW-32	03/13/19	15.5	0.025 U	0.02 U	0.05 U
		55.5	0.025 U	0.02 U	0.05 U
MW-33	3/12/19 & 3/13/19	10	0.025 U	0.02 U	0.05 U
		55.5	0.025 U	0.02 U	0.05 U
MW-36	05/26/23	20	0.025 U	0.02 U	--
		65	0.025 U	0.02 U	--
MW-37	11/7/22 & 11/8/22	15	0.025 U	0.02 U	--
		45	0.025 U	0.02 U	--
MW-8D	05/11/19	Composite	0.025 U	0.03 U	0.05 U
MW-12D	10/27/10	Composite	0.025 U	0.03 U	0.05 U
MW-13D	10/28/10	Composite	0.025 U	0.03 U	0.05 U
MW-15D	6/20/23 & 6/21/23 & 6/22/23	38.5	0.025 U	0.02 U	--
		63	0.025 U	0.02 U	--
		92	0.025 U	0.02 U	--
		109.5	0.025 U	0.02 U	--
		116	0.025 U	0.02 U	--
		148	0.025 U	0.02 U	--
R-12	07/31/07	1	<b>1.9</b>	<b>0.28</b>	--
R-18	07/31/07	1.5	<b>18</b>	<b>0.85</b>	--
S-1	08/31/06	15	0.02 U	0.02 U	0.1 U
T-1	06/29/07	0-1.75	<b>0.04</b>	0.02 U	--
TRENCH-BT-C	12/09/13	4.5	<b>0.26</b>	0.03 U	0.05 U
TRENCH-BT-E	12/09/13	4.5	<b>0.16</b>	0.03 U	0.05 U
TRENCH-BT-W	12/09/13	4.5	<b>0.25</b>	0.03 U	0.05 U
VE-5	02/26/19	15.9	0.025 U	0.02 U	0.05 U
		22.6	0.025 U	0.02 U	0.05 U
VE-6	02/28/19	9.2	<b>0.47</b>	0.02 U	0.05 U
		26.9	0.025 U	0.02 U	0.05 U
		40.3	0.025 U	0.02 U	0.05 U
VE-7	03/01/19	6.7	<b>1.4</b>	<b>0.16</b>	0.05 U
		15.6	<b>120</b>	<b>1.5</b>	<b>0.44</b>
		26.2	0.025 U	0.02 U	0.05 U
VE-8	02/27/19	9.9	<b>0.089</b>	0.02 U	<b>0.1</b>
		24.0	<b>7.3</b>	<b>0.15</b>	0.05 U
		33.2	<b>0.047</b>	0.02 U	0.05 U
Screening Level <sup>4</sup>			0.05	0.03	5

-- Not analyzed

U Analyte not detected at the indicated detection limit

bgs below ground surface

**Notes:**

- 1) All concentrations are in milligrams per kilogram (mg/kg). Only Site Contaminants of Concern (COCs) are included in this table. Detections are bolded. Screening level exceedances are shaded.
- 2) Soil sampling was also conducted for the purpose of profiling soil for off-site disposal. Those sampling results are not included in this table.
- 3) Methylene chloride was detected above its screening level of 0.02 mg/kg (MTCA Method A soil cleanup level) in three soil samples collected from MW-23. The laboratory report noted that those detections were likely due to laboratory contamination.
- 4) The screening levels are Model Toxics Control Act (MTCA) Method A soil cleanup levels.

**Table 2. Advance Outwash Groundwater Quality**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Sample Date	Tetrachloroethene (PCE)	Trichloroethene (TCE)	cis-1,2-Dichloroethene (cDCE)	Vinyl Chloride (VC)	2-Hexanone	Iron, total (mg/L)	
MW-2	08/28/07	2,900	1,800	7,100	19	--	--	
	01/30/08	1,400	520	2,000	0.2 U	--	--	
	10/02/08	1,900	880	2,300	3.1	10 U	--	
	05/12/09	1,600	930	2,400	2.7	10 U	--	
	12/22/10	2,100	1,100	2,100	2.7 J	10 U	--	
	02/07/12	1,600	810	1,400	0.2 U	1000 U	--	
	12/12/13	1,600	830	1,200	0.84	10 U	6.17	
	*** Biostimulants injected in June 2014 ***							
	01/21/15	19	25	150	0.77	22	294	
	07/30/15	17	46	600	15	--	--	
	09/08/15	18	77	610	17	--	--	
	02/02/16	22	190	640	15	--	--	
	09/22/16	16	110	480	7.8	--	--	
	01/04/17	18	80	520	7.4	--	--	
11/28/18	28	14	490	5.9	120	--		
03/26/20	24	7.1	540	5.6	--	38		
07/25/23	12	5 U	280	2.8	200 U	44.3		
MW-5 <sup>3</sup>	01/22/08	67	3	13	0.2 U	--	--	
	01/30/08	31	1.1	4.5	0.2 U	--	--	
	10/02/08	75	3.2	17	0.2 U	10 U	--	
	05/11/09	17	1.1	44	0.2 U	10 U	--	
	12/22/10	190	14	41	0.2 U	10 U	--	
	02/07/12	140	8.7	25	0.2 U	10 U	--	
	01/09/14	0.2 U	0.46	0.2 U	0.2 U	5 U	11.5	
	04/28/15	67	6.2	6.4	0.2 U	10 U	--	
	09/09/15	31	3.6	3.6	0.2 U	--	--	
	02/02/16	27	2.7	2.5	0.2 U	--	--	
	09/07/16	12	1.4	1.4	0.2 U	--	--	
	01/04/17	14	1.4	1.3	0.2 U	--	--	
	11/28/18	13	1.4	1 U	0.2 U	10 U	--	
	03/25/20	9.6	1 U	1 U	0.2 U	--	4.03	
07/26/23	7.4	0.72	1 U	0.02 U	20 U	0.17		
MW-7 <sup>3</sup>	01/22/08	6.6	1 U	1 U	0.2 U	--	--	
	01/30/08	1.5	1 U	1 U	0.2 U	--	--	
	10/02/08	1 U	1 U	1 U	0.2 U	10 U	--	
	05/11/09	1.1	1 U	1 U	0.2 U	10 U	--	
	12/22/10	1.4	1 U	1 U	0.2 U	10 U	--	
	02/06/12	1 U	1 U	1 U	0.2 U	10 U	--	
	01/07/14	1.4	1 U	1 U	0.2 U	10 U	14.5	
	03/26/20	1 U	1 U	1 U	0.2 U	--	21.1	
MW-8	04/22/08	1,300	780	2,400	0.2 U	--	--	
	10/02/08	680	390	3,600	6.9	10 U	--	
	05/12/09	780	370	2,600	2	10 U	--	
	12/22/10	470	150	1,800	1.4	10 U	--	
	02/07/12	960	610	1,600	20 U	1000 U	--	
	12/17/13	940	560	1,300	10 U	500 U	77.3	
	*** Biostimulants injected in June 2014 ***							
	01/20/15	14	8.5	1,200	9.4	50 U	89.1	
	07/30/15	41	17	740	8.9	--	--	
	09/10/15	18	13	1,000	12	--	--	
	02/01/16	21	13	830	7.1	--	--	
	09/07/16	50 U	50 U	560	10 U	--	--	
	09/22/16	16	11	500	5.4	--	--	
	01/05/17	19	12	480	5.6	--	--	
11/28/18	14	5.2	280	3.7	56	--		
03/25/20	8.4	2.9	210	2.4	--	20.3		
07/25/23	4.5	2	110	3.7	20 U	47.2		
MW-15	12/17/13	460	110	380	2 U	100 U	0.97	
	*** Biostimulants injected in June 2014 ***							
	09/08/15	86	53	220	4	--	--	
	02/01/16	43	25	290	7.4	--	--	
	09/07/16	15	8.4	330	4	--	--	
	01/04/17	6.6	3.3	520	4.9	--	--	
	11/28/18	3.3	1.6	65	0.78	10 U	--	
	03/23/20	1.2	1 U	67	7.9	--	3.63	
07/25/23	1 U	0.5 U	3.7	1	20 U	4.64		
MW-16	12/13/13	450	98	360	0.49	10 U	4.13	
	*** Biostimulants injected in June 2014 ***							
	01/21/15	14	6.3	180	2.2	50 U	62.5	
	11/28/18	11	2.8	230	2.6	10 U	--	
	03/25/20	3.7	1 U	74	0.83	--	21.5	



**Table 2. Advance Outwash Groundwater Quality**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Sample Date	Tetrachloroethene (PCE)	Trichloroethene (TCE)	cis-1,2-Dichloroethene (cDCE)	Vinyl Chloride (VC)	2-Hexanone	Iron, total (mg/L)	
MW-17	12/13/13	170	24	81	0.2 U	10 U	32.8	
	*** Biostimulants injected in June 2014 ***							
	11/28/18	9.7	2.1	83	0.72	31	--	
	03/24/20	5.4	1 U	77	0.86	--	36.4	
MW-18	07/26/23	1.3	0.65	13	0.53	20 U	29.2	
	12/12/13	460	57	360	0.53	10 U	0.22	
	*** Biostimulants injected in June 2014 ***							
MW-19	07/26/23	1 U	0.5 U	94	2.6	20 U	42.8	
	01/08/14	62	4.8	20	0.2 U	10 U	113	
	*** Biostimulants injected in June 2014 ***							
	01/21/15	9.7	5 U	45	1 U	73	59.4	
	09/09/15	7.6	3.9	35	1.5	--	--	
	02/02/16	8.5	5.1	43	1.5	--	--	
	09/07/16	20 U	20 U	20 U	4 U	--	--	
	09/22/16	8.5	4.1	16	0.43	--	--	
	01/04/17	12	4.6	36	0.97	--	--	
	11/28/18	2.5	1.6	53	0.56	19	--	
	03/24/20	1 U	1 U	46	0.51	--	89	
	07/25/23	1.8	0.8	1.6	0.49	20 U	28.4	
	MW-20	01/08/14	140	16	43	0.2 U	10 U	40.8
*** Biostimulants injected in June 2014 ***								
01/20/15		7.4	5.3	79	1.8	25	50.6	
09/09/15		11	5.8	150	1.5	--	--	
02/02/16		1 U	1 U	250	1.9	--	--	
09/07/16		20 U	20 U	250	4 U	--	--	
09/22/16		4.9	1.7	250	1.8	--	--	
01/04/17		6.2	2	240	2.5	--	--	
11/28/18		4.9	1 U	59	0.84	32	--	
*** Remediation products and microorganisms injected in July 2019 ***								
08/27/19		(Unable to collect water sample due to pump screen biofouling)						
12/12/19		1 U	1 U	14	1.5	58 J	114	
03/24/20		1.5	1 U	9.8	0.65	--	73	
MW-21	12/17/13	500	130	460	2 U	100 U	79.1	
	*** Biostimulants injected in June 2014 ***							
	01/20/15	15	12	270	1 U	50 U	42.2	
	09/08/15	7.1	9.2	510	7.4	--	--	
	02/01/16	18	17	650	9.7	--	--	
	09/22/16	12	13	320	4.1	--	--	
	01/04/17	15	14	340	4.2	--	--	
	11/28/18	14	7.6	190	2.3	27	--	
	03/25/20	19	9.6	230	1.5	--	34.3	
MW-23	07/26/23	34	9.8	33	1	20 U	20.1	
	03/14/19	100	25	18	0.2 U	10 U	--	
MW-24	03/26/20	140	23	20	0.2 U	--	4.95	
	02/13/19	66	12	5.4	0.2 U	10 U	3.64	
	08/27/19	42	10	5.1	0.2 U	10 U	41.4	
	12/12/19	50	11	4.2	0.2 U	10 U	4.07	
MW-25	03/26/20	58	11	4.1	0.2 U	--	3.47	
	02/13/19	37	3.6	3.0	0.2 U	10 U	1.67	
MW-26	03/26/20	36	3.2	3.0	0.2 U	--	0.83	
	02/13/19	20	2.4	2.1	0.2 U	10 U	4.24	
	08/28/19	20	2.7	2.2	0.2 U	10 U	49.4	
MW-27	12/13/19	19	2.3	2.0	0.2 U	10 U	51.7	
	03/25/20	15	1.4	1 U	0.2 U	--	45.3	
MW-28	02/13/19	9.4	1.6	1 U	0.2 U	10 U	3.22	
	03/24/20	9.3	1.5	1 U	0.2 U	--	6.94	
MW-29	03/26/19	20	5.1	2.1	0.2 U	10 U	--	
	03/25/20	20	2.7	1.8	0.2 U	--	3.06	
	08/01/23	9.9	2.1	1.4	0.02 U	20 U	0.96	
MW-30	03/26/19	12	1.1	1 U	0.2 U	10 U	--	
	03/25/20	14	1.4	1 U	0.2 U	--	17.2	
MW-31	02/25/19	27	6.2	6.3	0.2 U	10 UJ	4.53	
	03/26/20	1 U	1 U	1 U	0.2 U	--	6.92	
MW-32	02/25/19	150	45	28	0.2 U	10 UJ	8.68	
	03/26/20	160	40	34	0.2 U	--	8.82	
	03/26/19	36	8.7	2.8	0.2 U	10 U	--	
MW-32	03/26/20	45	9.1	4.9	0.2 U	--	2.76	
	07/26/23	5.6	0.65	1 U	0.02 U	20 U	1.29	

**Table 2. Advance Outwash Groundwater Quality**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Sample Date	Tetrachloroethene (PCE)	Trichloroethene (TCE)	cis-1,2-Dichloroethene (cDCE)	Vinyl Chloride (VC)	2-Hexanone	Iron, total (mg/L)
MW-33	03/26/19	<b>28</b>	<b>3.9</b>	<b>1.6</b>	0.2 U	10 U	--
	03/26/20	<b>34</b>	<b>5.4</b>	<b>2.4</b>	0.2 U	--	<b>5.28</b>
	08/01/23	<b>16</b>	<b>1.4</b>	1 U	0.02 U	20 U	<b>0.81</b>
MW-34	07/15/19	<b>18</b>	<b>1.4</b>	1 U	0.2 U	10 U	<b>3.65</b>
	08/27/19	<b>25</b>	<b>2.2</b>	<b>1.3</b>	0.2 U	10 U	<b>6.09</b>
	12/13/19	<b>11</b>	<b>1.4</b>	<b>20</b>	0.2 U	10 U	<b>7.32</b>
	03/25/20	<b>17</b>	<b>2.5</b>	<b>10</b>	0.2 U	--	<b>2.37</b>
MW-35	08/28/19	<b>39</b>	<b>4.9</b>	<b>2.8</b>	0.2 U	<b>15 J</b>	<b>6.17</b>
	12/13/19	<b>23</b>	<b>3.2</b>	<b>7.2</b>	0.2 U	10 U	<b>4.66</b>
	03/25/20	<b>22</b>	<b>3.6</b>	<b>4.9</b>	0.2 U	--	<b>2.22</b>
MW-36	07/25/23	1 U	0.5 U	1 U	0.02 U	20 U	<b>12.4</b>
MW-37	07/26/23	1 U	0.5 U	1 U	0.02 U	20 U	<b>2.1</b>
<b>Screening Level<sup>2</sup></b>		<b>5</b>	<b>5</b>	<b>16</b>	<b>0.2</b>	<b>40</b>	<b>11</b>

U not detected at the indicated detection limit

**Notes:**

- 1) All concentrations are in micrograms per liter (µg/L). Only anSite COCs are included in this table. Detections are bolded. Screening level exceedances (see Note 2) are shaded.
- 2) Screening levels are Model Toxics Control Act (MTCA) Method A groundwater cleanup levels, or Method B groundwater cleanup level when A not available (for cDCE and iron).
- 3) Potential impacts from Tully's Coffee water leak. An estimated 600,000 gallons of drinking water were released between May 2006 and Sept 2007 (per analysis of water bills).

**Table 3. Advance Outwash Groundwater Natural Attenuation Parameters**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Date	DO (mg/L)	pH	ORP (mV)	Chloride (mg/L)	Nitrate (mg/L)	Nitrite (mg/L)	Sulfate (mg/L)	Iron, total (mg/L)	Ferrous Iron (mg/L)	TOC (mg/L)	Methane (mg/L)	Ethene (mg/L)	Ethane (mg/L)	Dhc Assay <sup>2</sup>	
MW-1	10/2/08	4.27	6.49	28.4												
	5/11/09	2.05	5.91	-220.1												
	2/7/12	8.14	6.8	162												
	1/10/14	0.4	6.41	114		0.2	<0.1	8.8	4.07		<1.5					
MW-2	10/2/08	2.04	6.51	75.4												
	5/11/09	3.79	7.02	43.3												
	2/7/12	5.27	7.06	215												
	12/12/13	4.4	6.74	141		0.959	NA	9.26	6.17		<0.25					
	*** Biostimulants injected in June 2014 ***															
	1/21/15	1.6	6.25	33					294							
	9/8/15	0.17	5.78	44.7												
	2/2/16	0.45	5.74	7.2												
	9/22/16	0.22	5.6	11.2												
	1/4/17	0.41	5.62	11.2												
	11/28/18	3.45	5.36	68.8												
	2/27/19	0.5	5.5	58	50.6	<0.1	0.675	1.22	49.2	2.5	209					
3/26/20	0.51	5.09	59.3		0.452	0.726	<0.6	38		209						
7/25/23	3.15	5.85	23.4		< 0.5 U	1.2	< 3 U	44.3		324						
MW-5	10/2/08	4.77	6.86	-773												
	5/11/09	6.63	7.28	-49.1												
	2/7/12	6.2	6.78	87												
	1/9/14	2.1	6.51	74		0.7	<0.1	20.6	11.5		<1.5					
	4/28/15	4.2	6.4	106.4												
	9/9/15	7.06	6.5	116.3												
	2/2/16	6.73	6.44	14.2												
	9/6/16	8.67	6.27	100.8												
	1/4/17	8.55	6.72	76.7												
	11/28/18	8.74	6.32	90.6												
MW-7	10/2/08	3.61	6.68	-21												
	5/11/09	2.22	7.06	-175.2												
	2/6/12	3.03		93.8												
	1/7/14	8.5	6.87	53		1.39	0.006	28.4	14.3		<0.25					
	3/26/20	5.68	6.5	97.6		1.75	<0.2	29.6	21.1		<0.5					

**Table 3. Advance Outwash Groundwater Natural Attenuation Parameters**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Date	DO (mg/L)	pH	ORP (mV)	Chloride (mg/L)	Nitrate (mg/L)	Nitrite (mg/L)	Sulfate (mg/L)	Iron, total (mg/L)	Ferrous Iron (mg/L)	TOC (mg/L)	Methane (mg/L)	Ethene (mg/L)	Ethane (mg/L)	Dhc Assay <sup>2</sup>	
MW-8	10/2/08	0.82	6.47	-88.5												
	5/12/09	0.47	7.41	-62.7												
	2/7/12	1.34	6.81	-55												
	12/17/13	0.4		23		0.33	0.004	20.9	77.3		<0.25					
	*** Biostimulants injected in June 2014 ***															
	1/20/15	0.4	5.68	36					89.1							
	9/10/15	0.25	5.22	49.1												
	2/1/16	0.22	5.17	71.4												
	9/9/16	0.26	5.26	-11.8												
	9/22/16	0.22	5.4	19.5												
	1/5/17	0.18	5.34	49.7												
	11/28/18	0.61	5.75	12.5												
3/25/20	0.58	5.95	27.7			<0.1	<0.1	0.557	20.3		157					
7/25/23	0.06	5.57	10.5			< 0.2 U	0.616	1.97	47.2		142					
MW-15	12/17/13	4.1		75		2.08	<0.002	15.4	0.968		<0.25					
	*** Biostimulants injected in June 2014 ***															
	09/08/15	0.23	6.23	8.30												
	02/01/26	0.50	6.43	18.90												
	09/09/16	0.17	6.56	-87.50												
	01/04/17	0.24	6.76	-21.10												
	11/28/18	0.37	6.57	-30.80												
03/23/20	0.38	6.42	4.8			<0.1	<0.1	16	3.63		6.59					
07/25/23	0.5	6.68	-14			< 0.5 U	< 0.6 U	< 3 U	4.64		10.6					
MW-16	12/13/13	2.4	6.83	50		1.76	0.004	17	4.13		<0.25					
	*** Biostimulants injected in June 2014 ***															
	1/21/15	4.4	6.3	-3					62.5							
	11/28/18	0.33	6.1	-40.6												
3/25/20	7.79	6.86	-0.8			0.122	<0.1	2.09	21.5		63.4					
MW-17	12/13/13	1.7	7.09	63		1.51	0.004	14.9	32.8		<0.25					
	*** Biostimulants injected in June 2014 ***															
	11/28/18	0.26	5.88	79.90												
	03/24/20	0.9	6.31	23		0.222	0.402	1.93	36.4		258					
07/26/23	0.17	6.36	129.4			< 0.2 U	< 0.24 U	< 1.2 U	29.2		291					
MW-18	12/12/13	3.8	6.67	122		0.681	NA	17.8	0.216		0.639					
	*** Biostimulants injected in June 2014 ***															
7/25/23						< 0.1 U	< 0.12 U	< 0.6 U	42.8		33.9					

**Table 3. Advance Outwash Groundwater Natural Attenuation Parameters**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Date	DO (mg/L)	pH	ORP (mV)	Chloride (mg/L)	Nitrate (mg/L)	Nitrite (mg/L)	Sulfate (mg/L)	Iron, total (mg/L)	Ferrous Iron (mg/L)	TOC (mg/L)	Methane (mg/L)	Ethene (mg/L)	Ethane (mg/L)	Dhc Assay <sup>2</sup>	
MW-19	1/8/14	2.4	6.57	97		2.66	0.006	22.7	113		0.254					
	*** Biostimulants injected in June 2014 ***															
	1/21/15	0.4	5.62	42					59.4							
	9/9/15	0.22	5.78	96.6												
	2/2/16	0.56	5.98	13.7												
	9/7/16	0.33	5.8	38.5												
	9/22/16	0.32	5.53	-23.2												
	1/4/17	3.29	5.69	42.1												
11/28/18	0.79	5.83	35.5													
3/24/20	0.4	6.41	-52.6			<0.5	<0.5	<0.6	89		142					
7/26/23	0.12	6.36	-45			< 0.5 U	< 0.6 U	6.48	28.4		24.6					
MW-20	1/8/14	5.9	6.65	114		2.02	0.007	16.9	40.8		<0.25					
	*** Biostimulants injected in June 2014 ***															
	1/20/15	2.3	5.8	47					50.6							
	9/9/15	1.95	5.93	100.4												
	2/2/16	0.39	6.2	-7.8												
	9/7/16	0.22	5.75	69.4												
	9/22/16	0.15	5.54	18.8												
	1/4/17	1.17	5.92	40.4												
	11/28/18	0.39	6.1	-47.3												
	2/27/19	3.6	6.51	73	31.4	<0.1	0.128	<0.3	71	1.5	179					
	7/15/19	0.12	5.75	-11								10.2	<0.015	<0.016	<1 x 10 <sup>4</sup>	
	*** Remediation products and microorganisms injected in July 2019 ***															
	8/27/19	(Unable to collect water sample due to pump screen biofouling)														
12/12/19	1.05	6.0	-44			0.252	2.74	<0.3	114		809	3.73	<0.015	<0.016	<1 x 10 <sup>4</sup>	
3/23/20	0.29	5.9	-3.5			<0.2	1.3	<0.3	73		304					
12/17/13	2.6		56			2.12	0.005	13.9	79.1		<0.25					
MW-21	*** Biostimulants injected in June 2014 ***															
	1/20/15	1.1	6.0	45					42.2							
	9/8/15	0.1	5.4	116.5												
	2/1/16	0.1	5.4	64.6												
	9/22/16	0.0	5.1	28.7												
	1/4/17	0.1	5.2	44.4												
	11/28/18	0.3	5.1	-9.4												
	3/25/20	0.6	5.6	56			0.566	1.1	8.42	34.3		241				
7/26/23	0.1	6.5	14.8			< 0.5 U	< 0.6 U	12.1	20.1		165					
MW-23	3/14/19	8.5	6.9	56.1												
	3/26/20	6.9	6.9	46.3			0.912	<0.2	24.9	9.95	<0.5					
MW-24	2/13/19	1.2	7.2	44	32.9	0.606	0.186	12.6	3.64	<0.5	0.751					
	8/27/19	7.0	7.0	26		0.566	<0.2	11.6	41.4		3.36	0.028	<0.015	<0.016		
	12/12/19	1.1	6.9	28		0.307	<0.1	9.69	4.07		2.43	2.3	<0.015	<0.016		
	3/26/20	2.0	6.9	49		<0.1	<0.1	8.86	3.47		3.25					

**Table 3. Advance Outwash Groundwater Natural Attenuation Parameters**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Date	DO (mg/L)	pH	ORP (mV)	Chloride (mg/L)	Nitrate (mg/L)	Nitrite (mg/L)	Sulfate (mg/L)	Iron, total (mg/L)	Ferrous Iron (mg/L)	TOC (mg/L)	Methane (mg/L)	Ethene (mg/L)	Ethane (mg/L)	Dhc Assay <sup>2</sup>
MW-25	2/13/19	0.5	7.04	55	48.5	0.624	0.308	16.1	1.67	<0.5	0.862				
	3/26/20	0.38	6.37	66		0.556	<0.1	13.3	0.829		<0.5				
MW-26	2/13/19	7.6	7.03	53	46.9	1.78	0.154	14.4	4.24	<0.5	<0.5				
	8/27/19	7.7	6.5	75		1.92	<0.2	13.7	49.4		<0.5				
	12/13/19	7.0	6.7	17		1.85	<0.1	12.9	51.7		<1.0				
	3/25/20	7.5	6.3	34		1.69	<0.1	13.4	45.3		<1.0				
MW-27	2/13/19	3.7	6.94	72	298	2.41	<1	18.9	3.22	<0.5	0.719				
	3/24/20	5.57	6.52	24		2.01	<0.2	23.1	6.94		0.506				
MW-28	3/26/19	6.24	7.06	121.3											
	3/25/20	4.07	6.43	55.3		1.76	<0.2	18.5	3.06		<0.5				
	8/1/23	9.19	7.00	213.5		1.77	< 0.24 U	20.2	0.956		0.791				
MW-29	3/26/19	3.96	7.14	92.8											
	3/25/20	7.16	6.94	35.8		1.29	<0.1	14.6	17.2		<0.5				
MW-30	2/25/19	8.3	6.99	70	10.1	1.17	<0.2	24.2	4.53	<0.5	1.24				
	3/26/20	7.54	6.28	65		1.71	<0.2	35.3	6.92		<0.5				
MW-31	2/25/19	3.6	6.9	75	23.7	1.09	0.166	13.3	8.68	<0.5	0.723				
	3/26/20	3.64	6.79	51		0.462	<0.2	13.3	8.82		0.541				
MW-32	3/26/19	8	6.9	85.1											
	3/26/20	7.87	6.37	83.4		2.95	<0.2	17	2.76		<0.5				
	7/26/23	10.27	6.46	295.2		0.946	< 0.24 U	17.9	1.29		1.34				
MW-33	3/26/19	6.85	6.8	117.5											
	3/26/20	7.34	6.5	95.3		11.4	<0.2	27.3	5.28		<0.5				
	8/1/23	9.53	6.65	224.2		1.49	< 0.24 U	19.9	0.806		0.857				
MW-34	7/15/19	0.96	6.74	9		0.484	0.125	15.1	3.65		3.9	0.031	<0.015	<0.016	<1 x 10 <sup>4</sup>
	8/27/19	0.94	7.0	13		0.285	<0.4	7.48	6.09		20.5	<0.0086	<0.015	<0.016	<4 x 10 <sup>3</sup>
	12/13/19	0.52	7.1	53		<0.1	<0.1	4.26	7.32		6.76	0.065	<0.015	<0.016	<3 x 10 <sup>3</sup>
	3/25/20	1.3	6.6	6.6		0.445	<0.1	8.65	2.37		1.23				
MW-35	8/27/19	0.65	6.6	-28		0.268	1.17	7.27	6.17		132				
	12/13/19	1.5	6.8	-38		0.388	<0.1	13.2	4.66		3.66	<0.0086	<0.015	<0.016	<6 x 10 <sup>3</sup>
	3/25/20	2.0	6.5	72		0.611	<0.1	13.1	2.22		0.699				
MW-36	7/26/23					1.22	< 0.6 U	20.3	12.4		1.71				
MW-37	7/26/23	10.1	6.7	273.3		0.818	< 0.24 U	14.6	2.1		0.756				

bgs below ground surface mg/L milligrams per liter NA natural attenuation TOC total organic carbon  
 DO dissolved oxygen mV millivolts ORP oxidation-reduction potential

**Notes:**

- 1) Blank cell indicates sample was not analyzed for that parameter.
- 2) Gene-Trac® dehalococoides (Dhc) assay based on quantification of Dhc 16S rRNA gene copies. Dhc are generally reported to contain one 16S rRNA gene copy per cell; therefore, this number is often interpreted to represent the number of Dhc cells present in the 1-liter sample.

**Table 4. Groundwater Quality and Natural Attenuation Parameters, Deeper Water-Bearing Zones**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Sample Date	Tetrachloroethene (PCE)	cis-1,2-Dichloroethene (cDCE)	2-Hexanone	Iron, total (mg/L)	DO (mg/L)	pH	ORP (mV)	Nitrate (mg/L)	Nitrite (mg/L)	Sulfate (mg/L)	TOC (mg/L)
MW-8D	05/11/09	1 U	11	10 U	--	5.15	6.31	-209.5				
	12/22/10	1 U	21	10 U	--							
	02/06/12	1 U	26	10 U	--	5.31	3.47	126.5				
	01/10/14	0.2 U	42	5 U	0.79	7.6	6.67	112	1.6	<0.1	22.8	< 1.5 U
	04/28/15	1 U	54	10 U	--	5.2	6.61	145				
	09/08/15	1 U	65	--	--	5.2	6.62	55				
	02/02/16	1 U	62	--	--	4.2	6.69	18				
	09/07/16	1 U	69	--	--	5	6.61	15				
	01/12/17	1 U	77	--	--							
	04/09/19	1 U	97	--	--		8.36	6.62	76			
03/23/20	1 U	110	--	--	0.502	4.95	6.71	75.4	2.13	<0.1	21.2	< 0.5 U
08/01/23	4	84	20 U	0.282	6.5	6.51	225.2	1.79	<0.24	19	0.942	
MW-12D	12/22/10	6.1	22	10 U	--							
	02/06/12	1 U	17	10 U	--	7.26	6.09	139.3				
	01/10/14	0.7	22	10 U	--	8.8	7.35	114				
	04/29/15	1 U	13	5 U	--	8.3	7.63	130				
	09/10/15	1 U	9.1	10 U	--	8	7.52	23				
	02/02/16	1 U	9.2	--	--	7.8	7.58	18				
	09/07/16	1 U	3.4	--	--	0.8	7.87	-9				
	01/12/17	1 U	3.0	--	--							
03/24/20	1 U	8.9	--	6.42	8.02	7.75	61.5	4.06	<0.1	19.1	< 0.5 U	
MW-13D	12/22/10	14	30	10 U	--							
	02/07/12	4.2	28	10 U	--	5.98	6.93	252				
	12/16/13	5.9	32	10 U	--	5.4	6.59	85				
	04/29/15	1 U	14	10 U	--	7.9	6.88	152				
	09/09/15	4.1	22	--	--	6	6.66	138				
	02/02/16	2.2	23	--	--	6.8	6.72	17				
	09/07/16	2.3	13	--	--	4.5	6.48	19				
	01/12/17	11	16	--	--							
	04/09/19	3.1	12	--	--		8.65	6.31	126			
03/24/20	3.7	13	--	26.9	6.53	6.76	67.4	3.45	< 0.1 U	19.8	0.538	
07/26/23	6.1	6	20 U	1.35				2.91	< 0.24 U	17.4	0.719	

**Table 4. Groundwater Quality and Natural Attenuation Parameters, Deeper Water-Bearing Zones**

Project No. AS080190, Morrell's Dry Cleaners (VCP No. SW1039), Tacoma, Washington

Well ID	Sample Date	Tetrachloroethene (PCE)	cis-1,2-Dichloroethene (cDCE)	2-Hexanone	Iron, total (mg/L)	DO (mg/L)	pH	ORP (mV)	Nitrate (mg/L)	Nitrite (mg/L)	Sulfate (mg/L)	TOC (mg/L)
MW-14D	02/06/12	4.2	28	10 U	--	5.45						
	01/23/14	2.4	4.5	10 U	--	5.26	6.37	720				
	04/29/15	2.2	2.5	10 U	--	6.2	6.6	143				
	09/09/15	9.2	15	--	--	5	6.54	99				
	02/02/16	1.8	2.2	--	--	5.8	6.9	-24				
	09/07/16	3.2	3.6	--	--	5.1	6.33	74				
	01/12/17	7.4	4.8	--	--							
	04/09/19 <sup>3</sup>	1 U	1 U	--	--	6.26	6.58	100.1				
	03/25/20	1.8	1.8	--	<b>8.65</b>	5.93	6.51	80.8	3.38 J	< 0.1 U	20.2	< 0.5 U
MW-15D	08/01/23	1.3	1 U	20 U	<b>0.102</b>	7.68	6.26	231.6	3.13	<0.24 U	17.5	< 0.7 U
	<b>Screening Level<sup>2</sup></b>	5	16	40	11							

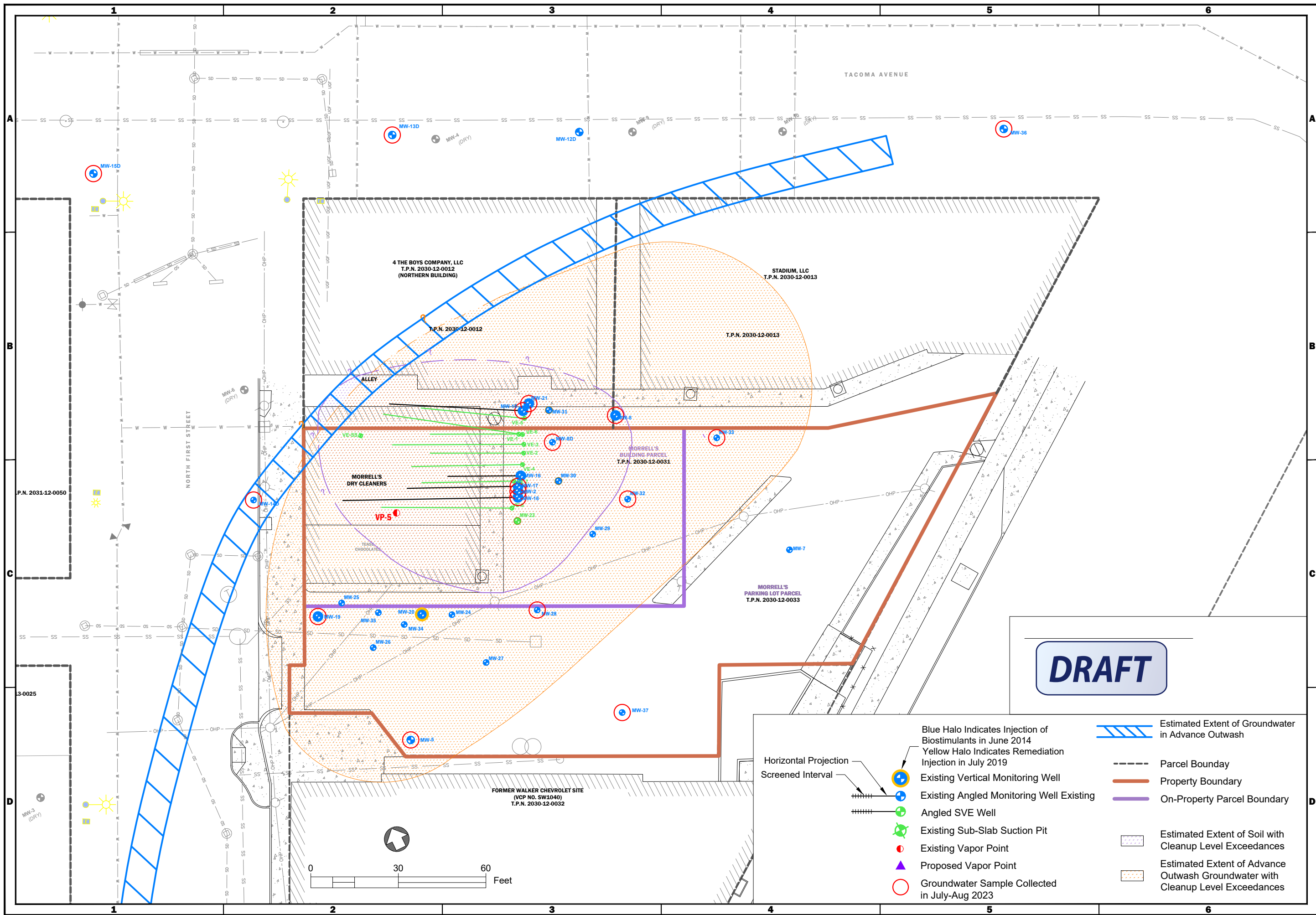
U not detected at the indicated detection limit

**Notes:**

- 1) All concentrations are in micrograms per liter (µg/L). Only analytes with concentrations exceeding their respective screening levels in at least one sample are included in this table. Detections are bolded. Screening level exceedances are shaded.
- 2) Screening levels are Model Toxics Control Act (MTCA) Method A groundwater cleanup levels, or Method B groundwater cleanup level when A not available (for cDCE and iron).
- 3) Extensive Sound Transit construction in North First St adjacent to MW-14D may have impacted concentrations at that well on 04/09/19.



**FIGURE**



	<b>Site Plan</b> Stilewide Remedial Investigation and Feasibility Study Report Morrells Dry Cleaner (VCP No. SW1039) 608 North 1st Street, Tacoma, Washington
DATE: Sep-2023 REVISION:	PROJECT NUMBER: 080190 DESIGNED BY: BMG DRAWN BY: SOC REVISED BY: BBC
DATE: Sep-2023 REVISION:	PROJECT NUMBER: 080190 DESIGNED BY: BMG DRAWN BY: SOC REVISED BY: BBC
DATE: Sep-2023 REVISION:	PROJECT NUMBER: 080190 DESIGNED BY: BMG DRAWN BY: SOC REVISED BY: BBC
FIGURE NO. <span style="font-size: 2em; font-weight: bold;">1</span>	

CAD Path: Q:\Geotech\080190\_ Stadium\Trafway\2023-09-26\Stilewide RI and FS Report\080190-02-05-01-09 Site Plan.dwg 01 Site Plan | | Coordinates System: NAD 83 State Plane Washington North FIPS 4603 Feet | | Data Source: Sep-15-2023 9:12pm | | User: socad

## **APPENDIX A**

**Ecology email communication  
dated November 2, 2021**

## Breeyn Greer

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**From:** Breeyn Greer (Aspect)  
**Sent:** Tuesday, November 2, 2021 5:03 PM  
**To:** Acklam, Nicholas (ECY)  
**Cc:** Doug Hillman; Jeremy Porter (Aspect)  
**Subject:** RE: Morell's Sitewide RI/FS Work Plan / Ecology Opinion  
**Attachments:** Data Gaps Mark-Up\_10.27.21\_BMG.pdf

Good evening Nick,

We want to thank you for your thorough review of our Sitewide RI/FS Work Plan (Aspect, June 4, 2021) and providing your Opinion on the Proposed Cleanup (Ecology, September 23, 2021). The letter was encouraging to us and seems like we are primarily in agreement on additional characterization efforts needed to complete a Sitewide RI/FS, which Aspect is eager to complete in the coming months. There are some points presented in the Ecology Opinion that have practical implementation limits, that we propose modifying slightly to accomplish a similar set of objectives.

Below I've outlined Aspect's Original proposal, Ecology's Opinion Proposal, and Aspect's revised hybrid proposal for your consideration.

We'd welcome additional dialogue on this topic if you'd like to hop on a conference call.

### **Aspect's original proposal in RI Work Plan**

- Groundwater Investigation – One new Deep Water Bearing Zone (DWBZ) well to be installed in City of Tacoma (the City) right-of-way (ROW) (MW-15D). Additional groundwater monitoring at a total of 14 Site monitoring wells to support forthcoming FS. This requires a City Street Use Permit (SUP), and \$10,000 financial assurance.
- Soil Investigation – Six soil samples to be collected from the single proposed additional deep well in the City ROW (MW-15D)
- Vapor Intrusion Investigation – Assess radius of influence of SVE system by a) placing two vapor pins in the public sidewalk and assessing vacuum or b) placing a series of vapor pins in the Parking Lot Parcel asphalt and measuring vacuum at each.

### **Ecology's Opinion proposal**

- Groundwater Investigation – One new DWBZ well to be installed in the City ROW (MW-15D). Three new Shallow Water Bearing Zone (SWBZ) wells installed both on and off the Parking Lot Parcel (MW-36, MW-37, MW-38). Additional groundwater monitoring at a total of 26 Site monitoring wells (including the four new wells). This would require a City SUP and \$30,000 financial assurance.
- Soil Investigation – Soil samples to be collected from the proposed single additional DWBZ well, as well as the three additional SWBZ wells placed both on and off the Parking Lot Parcel.
- Vapor Intrusion Investigation – Sub-slab soil gas and indoor air samples in Morell's, Tease Chocolates, and each of the northern buildings. This proposal requires access agreements with both of the Northern Parcel Owners (4 The Boy Company, LLC and Stadium, LLC). Ecology also recommends completing a sub-slab depressurization study in the Morell's building to demonstrate continuous protection via the SVE system. Should access not be granted to the northern buildings, Ecology recommends collecting soil gas samples on all sides of the buildings as near to the foundations as possible. This alternate option would require a City SUP and a direct push drill rig.

### **Aspect revised hybrid proposal**

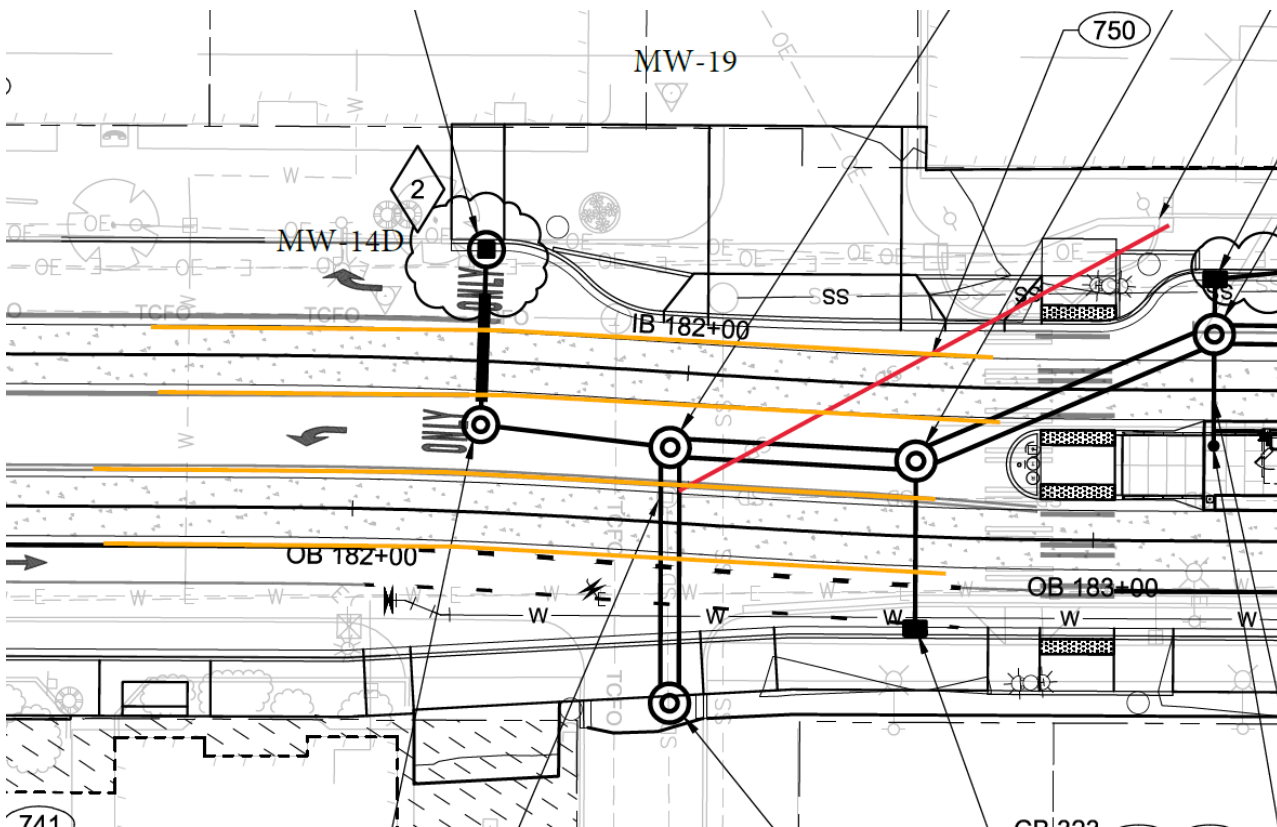
- Groundwater Investigation – One new DWBZ well to be installed in City of Tacoma ROW (MW-15D) and one new shallow water bearing zone monitoring well on the Parking Lot Parcel (MW-37). Aspect agrees to attempt the additional SWBZ well in the City ROW (MW-36), contingent on locating utility free placement and the City SUP being granted. MW-38 is proposed in a utility network that does not appear to be

conducive to well installation, and Aspect does not propose to install it (screen shot of City plans below). We realize that this will have implications on the assumed extents of contamination and are interested in engaging in the ideas of 1) overdrilling MW-14-D and screening in the SWBZ (provides GW data but not soil data) or 2) making an assumption on the limits of soil contamination there.

- Aspect proposes that groundwater monitoring should remain at a total of 14 Site monitoring wells (including the new wells).

The purpose of additional data collection is to support the forthcoming feasibility study including both active groundwater treatment and monitored natural attenuation cleanup alternatives. The vast majority of wells have demonstrated consistent concentrations since roughly 2016 (when the 2014 biostimulation injection effects were complete) and therefore the costs associated with additional sampling outweigh the benefit of sampling the requested 26 wells. Rather, wells with inconsistent or high concentrations and boundary wells will be focused on in addition to the proposed new wells. Aspect is happy to modify the list of wells to be sampled based on Ecology feedback, perhaps MW-33, MW-32, MW-29, MW-28, MW-27, MW-5, MW-21, MW-19, MW-17, MW-2, MW-15D, MW-36, MW-37, and MW-8D would be an agreeable list? MW-2 and M-17 would have ethane, ethene, and methane added to analyte list.

- Soil Investigation – Six soil samples to be collected from the proposed single additional DWBZ well, as well as two samples from any additional SWBZ wells (see conditions of well installation above).
- Vapor Intrusion Investigation – Sub-slab soil gas samples in Morell’s, Tease Chocolates, and each of the northern buildings contingent on access agreements with both of the Northern Parcel Owners. Aspect agrees to complete a sub-slab depressurization study in the Morell’s building to demonstrate protection via the SVE system. Aspect proposes that any indoor air sampling be in a second phase of investigation, should any of the sub-slab results warrant it. Aspect also proposes to not collect indoor air samples in the Morell’s/Tease Chocolates building due to active dry cleaner use. The results of the sub-slab soil gas investigation will be compared against screening levels in Ecology’s Implementation Memorandum No. 22: Vapor Intrusion Investigations and Short-Term Trichloroethylene Toxicity (Ecology, 2019).



Utilities shown in gray and black exist. The storm shown in red has been removed.

Also, based on my discussions with the City this spring, a min 5' is needed from the tracks (approx. offset shown in orange).

This leaves no space for additional drilling.

Please consider and let us know your thoughts on the proposed hybrid investigation approach.  
We'd also be happy to set up a conference call to discuss.

Thank you for your efforts on this, ~Breeyn

**Breeyn Greer, PE** | Project Engineer | Direct: 206.812.4739 | Cell: 612.232.7343

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***Due to COVID and my remote work situation, I may be responding to emails at hours outside of a typical workday. Please feel free to respond during your workday.***

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