



State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
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(360) 407-0520 • (800) 822-3905
www.plia.wa.gov

September 24, 2024

Robert Speer
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

Re: No Further Action at the Following Site:

- **Facility/Site Name:** Former Texaco 1465
- **Facility/Site Address:** 7717 Bridgeport Way W, Tacoma, WA 98499
- **Facility Site ID:** 50865495
- **Technical Assistance Program No.:** P-SW2602

Dear Robert Speer:

The Washington State Pollution Liability Insurance Agency (PLIA) received your request for an opinion on the independent cleanup located at 7717 Bridgeport Way W, Tacoma, WA 98499 (Site). This letter provides PLIA's opinion made under the authority of Chapter 70A.330 RCW and Chapter 374-80 WAC. PLIA appreciates your initiative in pursuing this administrative option for cleaning up a contaminated site under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Opinion on Cleanup

PLIA has determined that **no further remedial action is necessary** to clean up petroleum contamination at the Site.

This opinion is based on the remedial action meeting the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). Our analysis is provided below.

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Description of the Site

This opinion applies only to the identified petroleum release at the Site located at 7717 Bridgeport Way W, Tacoma, WA 98499 and includes Pierce County tax parcel 0220263102. This opinion does not apply to any other hazardous substance release(s) that may affect the Property (parcel).

The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons (TPH) as gasoline-range organics (GRO), diesel-range organics (DRO), and oil-range organics (ORO); benzene, toluene, ethylbenzene, and xylenes (BTEX); and lead into the soil and groundwater.

Basis of the Opinion

This opinion is based on the information contained in the following documents:

1. *Closure Request Addendum, Former Texaco Service Station 211545.* Prepared by Arcadis U.S., Inc. September 19, 2024.
2. *Site Status Report and Request for Closure, Former Texaco Service Station 211545.* Prepared by Arcadis U.S., Inc. July 2, 2024.
3. *Remedial Investigation Report, Former Texaco Service Station 211545.* Prepared by Arcadis U.S., Inc. January 10, 2023.
4. *Underground Storage Tank Decommissioning and Preliminary Subsurface Investigation Report, Texaco Service Station.* Prepared by SEACOR. April 10, 1992.

These reports are available for download at: [**Former Texaco 1465 Public Files.**](#)

Documents submitted to PLIA are subject to the Public Records Act (Chapter 42.56 RCW). To make a request for public records, please email [**pliamail@plia.wa.gov.**](mailto:pliamail@plia.wa.gov)

This opinion is void if any of the information contained in those documents is materially false or misleading.

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Establishment of Cleanup Standards and Points of Compliance

The cleanup levels (CULs) for the Site will be established in accordance with WAC 173-340-700(5) and WAC 173-340-700(6).

The points of compliance (POCs) for the Site will be established in accordance with WAC 173-340-720(8) for groundwater, WAC 173-340-740(6) for soil, and WAC 173-340-750(6) for air.

Analysis of the Cleanup

PLIA has concluded that **no further remedial action** is necessary at the Site. Our conclusion is based on the following analysis:

Cleanup of the Site:

Site data demonstrate that petroleum contamination from a petroleum underground storage tank (UST) system release exceeded the levels allowable under MTCA. This opinion only addresses the contaminants of concern (COCs) as detailed in the *Description of the Site* section of this letter. The Site history is detailed in the documents cited above.

PLIA has determined that the cleanup actions performed meet cleanup standards established for the Site. The following cleanup actions have been performed at the Site:

i. Soil:

- The Site was reportedly an active Texaco service and gasoline station from 1971 to 1991. In 1991, the station was decommissioned with above-and below-grade infrastructure removed. Confirmation soil samples were collected from the USTs, dispenser island, hydraulic hoist and sump, and dry well excavations.
- Sample results confirmed the presence of petroleum contaminated soil (PCS) with concentrations of GRO, DRO, ORO, and BTEX exceeding MTCA Method A CULs. PCS ranged in depth between 5' and 15' below ground surface (bgs).
- An air sparging/soil vapor extraction (AS/SVE) system was operated on-Site between 1993 and 1996. Hydrocarbon removal rates were reportedly between 1-20 pounds per day.
- In 1996, six soil borings were completed to characterize Site soil contamination. COCs exceeded MTCA Method A CULs in samples

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- collected from 12' to 15' bgs from three soil borings.
- A soil sample was collected from a boring completed in 2000 and analyzed for extractable petroleum hydrocarbons/volatile petroleum hydrocarbons (EPH/VPH) to derive a Site-specific Method B CUL for TPH in soil.
 - In 2023, nine soil borings were completed to evaluate current soil conditions and confirm if soil COC concentrations were less than CULs. GRO, benzene, and xylenes were detected in soil samples at concentrations exceeding MTCA Method A CULs.
 - PLIA agrees that using MTCA Method B soil direct contact CULs is appropriate since the recent sample result exceedances for GRO, benzene, and xylenes have adequately demonstrated that the soil leaching to groundwater exposure pathway is incomplete.

Result: The data indicate the soil direct contact and soil leaching to groundwater exposure pathways are incomplete at the Site. The remedial action(s) removed the potential for PCS with concentrations of COCs exceeding CULs to come into contact with human or ecological receptors or leach into groundwater.

ii. **Groundwater:**

- Depth to groundwater recorded at the Site ranged between 7.77' (at BGW-6) and 17.31' (at AGW-3) below top of casing. Groundwater flow direction is generally to the north-northwest with fluctuations to the northwest and northeast.
- GRO, DRO, ORO, BTEX, and dissolved lead were historically detected at concentrations exceeding MTCA Method A CULs in groundwater samples collected from Site monitoring wells.
- Groundwater samples collected in monitoring well CGW-7 has exceeded MTCA Method A CULs for DRO and ORO in three of the last five sampling events. Silica gel cleanup (SGC) was used each sampling event, and the sample results were less than the MTCA Method A CULs for DRO and ORO. PLIA agrees that the lack of soil contamination in samples collected from monitoring well CGW-7 suggests the DRO and ORO exceedances may be due to biogenic interference.
- Concentrations of COCs using SGC were less than MTCA Method A CULs in consecutive quarterly groundwater performance samples.

Result: The data indicate the groundwater exposure pathway is incomplete at this Site. The remedial action(s) removed the

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potential for groundwater with concentrations of COCs exceeding CULs to come into contact with humans or ecological receptors.

PLIA recommends decommissioning all Site monitoring wells no longer required for groundwater monitoring, as determined by PLIA. Please note monitoring wells must be decommissioned by a Washington-state licensed drilling contractor, pursuant to WAC 173-160-460. PLIA requests that you provide monitoring well decommissioning documentation to PLIA for the project file. Additionally, the property owner should keep all supporting documentation of compliance (e.g. well logs, completed forms, and well tags) to provide documentation of proper decommissioning to the Washington State Department of Ecology upon request.

iii. Air (Soil or Groundwater to Vapor):

- PCS and/or petroleum contaminated groundwater (PCGW) within the lateral inclusion zone and/or vertical separation distance of Site buildings was successfully remediated to concentrations of COCs less than the MTCA Method A CUL.

Result: The data indicate the vapor intrusion pathway is incomplete at this Site. The remedial action removed the potential for vapors from PCS or PCGW to enter nearby commercial or residential structures.

iv. Surface Water:

- Not applicable for the Site. The nearest surface water, Flett Creek, is approximately 320' to the southwest of the Site.

Result: The surface water exposure pathway is incomplete at this Site. This means that, based on current data, petroleum contamination has not spread to surface water.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Under MTCA, liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release(s) of hazardous substances at the Site. This opinion **does not:**

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- Change the boundaries of the Site.
- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with the Office of the Attorney General and the Department of Ecology under RCW 70A.305.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is equivalent. Courts make that determination (RCW 70A.305.080 and WAC 173-340-545).

3. State is immune from liability.

The state, PLIA, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion.

Termination of Agreement

This opinion terminates the Technical Assistance Program (TAP) agreement for Project No. P-SW2602.

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Contact Information

Thank you for choosing to clean up your Site under PLIA's TAP. If you have any questions about this opinion, please contact me by phone at 1-800-822-3905, or by email at pliamail@plia.wa.gov.

Sincerely,

Signed by:

9A78BD0052524F7...

William J. Fees, P.E.
Environmental Engineer

Enclosure A: Figure 1: Site Vicinity Map
 Figure 2: Site Plan Map

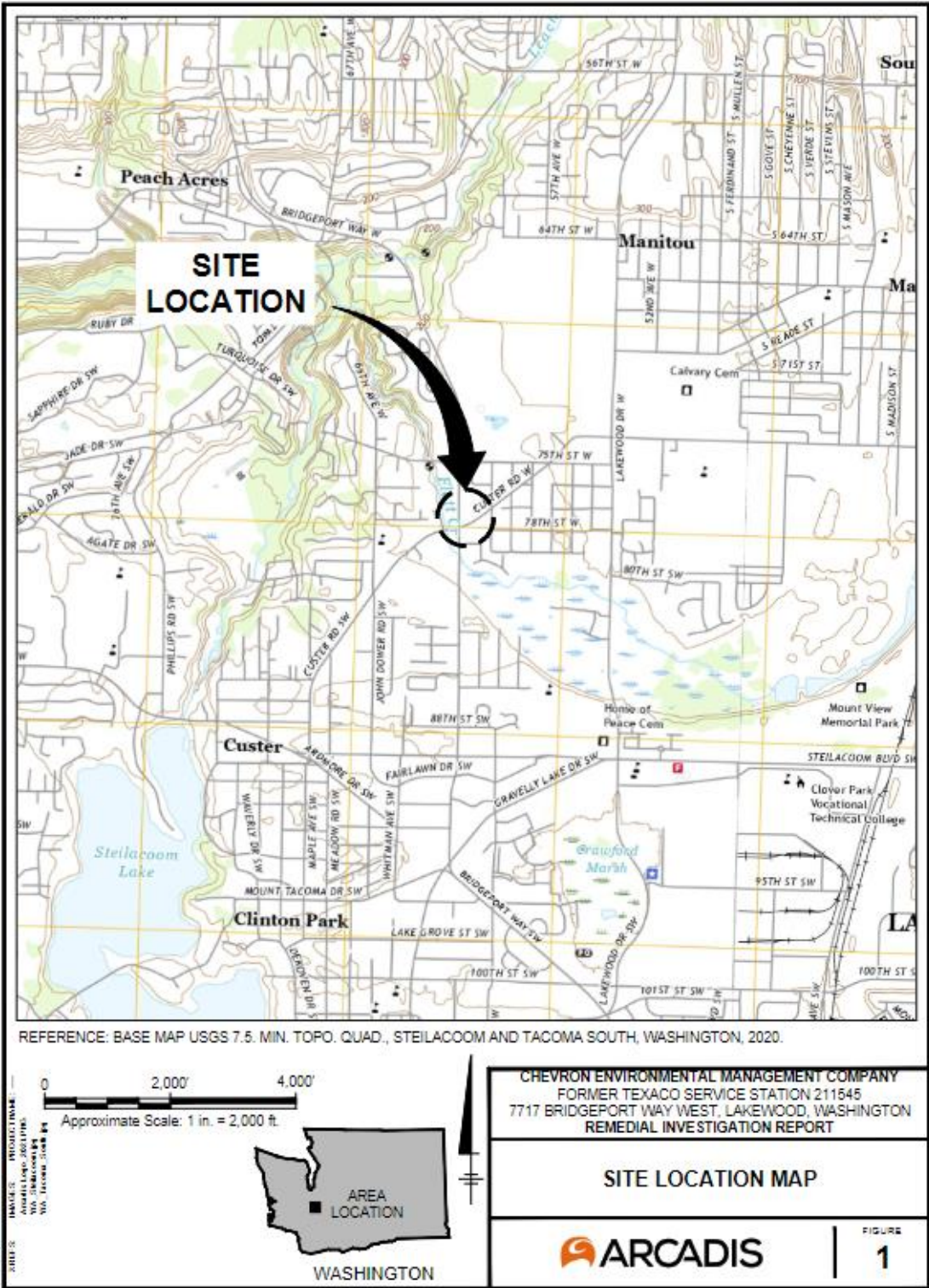
cc: Carl Donovan, Arcadis U.S. Inc. (by email)
 Amanda Bowring, Arcadis U.S. Inc. (by email)

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Enclosure A:
TAP Project No. P-SW2602
7717 Bridgeport Way W,
Tacoma, WA 98499

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Figure 1: Site Vicinity Map



Source: Closure Request Addendum, Arcadis U.S., Inc., September 19, 2024.

BRIDGEPORT WAY

CUSTER ROAD

LEGEND:

- SITE PROPERTY LINE
- APPROXIMATE UST LOCATION
- MW-# MONITORING WELL
- SB-# SOIL BORING
- AGMW-# ABANDONED MONITORING WELL

ACTIVITIES:

- UST UNDERGROUND STORAGE TANK

GRAPHIC SCALE

0 20 40

OLIVER ENVIRONMENTAL MANAGEMENT COMPANY
FORMER TEXAS SERVICE STATION 211245
7111 BRIDGEPORT WAY WEST, LAKWOOD, WASHINGTON

SITE PLAN

ARCADIS

FIGURE 3

Source: *Closure Request Addendum*, Arcadis U.S., Inc., September 19, 2024.