



First Periodic Review Bruce Titus Chevrolet

**633 Division Avenue, Tacoma, Pierce County, 98403
Facility Site ID: 3427832, Cleanup Site ID: 5318**

Toxics Cleanup Program, Southwest Region

Washington State Department of Ecology
Lacey, Washington

December 2024

Document Information

This document is available on the Department of Ecology's [Bruce Titus Chevrolet cleanup site page](#).¹

Related Information

- Facility Site ID: 3427832
- Cleanup Site ID: 5318

Contact Information

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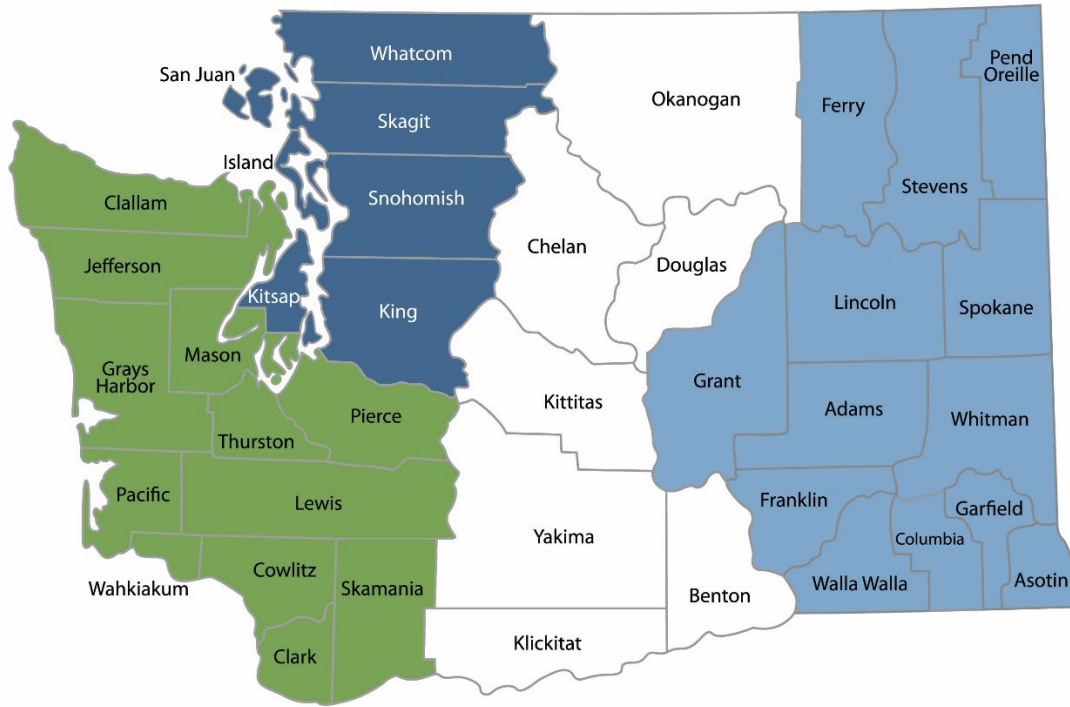
¹ <https://apps.ecology.wa.gov/cleanupsearch/site/5318>

² <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Bruce Titus Chevrolet cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). The Site is located at 633 Division Avenue in Tacoma, Washington (refer to the Site Location Map in Appendix A).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP) ID #SW1616. Following completion of the cleanup action, residual concentrations of contaminants that exceeded MTCA cleanup levels remained on the property. These contaminants included total petroleum hydrocarbons (TPH) in the gasoline range (TPH-G), TPH in the diesel range (TPH-D), TPH in the heavy oil range (TPH-O), toluene, xylenes, lead, polychlorinated biphenyls (PCBs) and tetrachloroethylene (PCE) in soil, and trichloroethylene (TCE) in groundwater. The MTCA cleanup levels for soil and groundwater are established under [WAC 173-340-740](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740)⁴ and [WAC 173-340-720](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720),⁵ respectively.

Ecology determined institutional controls in the form of an environmental covenant would be required as part of the cleanup action for the Site. Ecology is required under [WAC 173-340-420\(2\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-420(2))⁶ to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because institutional and engineered controls and periodic groundwater monitoring are required as part of the Site cleanup to ensure the remedy remains protective. These requirements were part of a [no further action \(NFA\) determination](#)⁷ issued under the VCP in January 2018.

Due to staffing shortages and the pandemic, Ecology did not have resources to complete the periodic review at this site from the originally scheduled periodic review in January 2023 until the date of the periodic review process early notification letter, which was issued on November 14, 2023.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

- a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site
- b) New scientific information for individual hazardous substances or mixtures at the site

⁴ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740>

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720>

⁶ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420>

⁷ <https://apps.ecology.wa.gov/cleanupsearch/document/70024>

- c) New applicable state and federal laws for hazardous substances present at the site
- d) Current and projected site and resource uses
- e) The availability and practicability of more permanent remedies
- f) The availability of improved analytical techniques to evaluate compliance with cleanup levels

Ecology publishes a notice of all periodic reviews in the *Site Register*.

Summary of Site Conditions

Site description and history

The current [Bruce Titus Chevrolet Site](#)⁸ includes the former South Gas Station Area and the former Paint Booth Area (see Site Map in Appendix B), both of which are located on Pierce County Tax Parcel #2030120032. The footprint of the Site, which corresponds to the area established in the environmental covenant, includes the main building and surrounding sidewalk and roadway areas as depicted on the maps included in Appendix B.

The original investigation area, of which the current Site is a part, included two facilities that were subsequently designated as separate sites based on historical uses and documented releases. These include the [North Gas Station](#) (NGS) site, CSID 14422, and the [Morrells Dry Cleaners](#) site, CSID 386. The NGS site was enrolled in Ecology's Voluntary Cleanup Program (VCP) in December of 2017, and a site NFA determination was issued on May 10, 2018. The Morrells Dry Cleaners site is also enrolled in the VCP, and the cleanup is ongoing. Refer to Ecology's site information pages at the links below for additional information regarding these two sites:

- North Gas Station - <https://apps.ecology.wa.gov/cleanupsearch/site/14422>
- Morrells Dry Cleaners - <https://apps.ecology.wa.gov/cleanupsearch/site/386>

Historical investigation and cleanup activities performed at the Bruce Titus Chevrolet Site are summarized in the following sections and described in greater detail in Ecology's previous VCP opinions and reports for the Site. Site documents can be viewed and downloaded at Ecology's site information website (<https://apps.ecology.wa.gov/cleanupsearch/site/5318>).

A vicinity map is provided in Appendix A, and Site plans are included in Appendix B. Appendix C contains a photo log from Ecology's inspection on December 15, 2023.

⁸ <https://apps.ecology.wa.gov/cleanupsearch/site/5318>

Site investigations

The current Site includes two investigation areas, the South Gas Station and former Paint Booth areas.

Historical investigations in the South Gas Station area have included the removal of seven underground storage tanks (USTs), pump islands, and associated piping in 1994. Soil sampling was performed at the time of UST removal, including 25 samples from four excavation areas, to document and characterize site conditions. Additional investigation to characterize the extent of residual soil and potential groundwater impacts was conducted between 2006 and 2016 including 13 soil borings and installation of one monitoring well, MW-1.

Historical investigations in the former Paint Booth area were performed between 1994 and 2016, and have included an assessment of soil, groundwater, and air. Soil samples were collected from 26 borings during investigations performed in 1994, 2006, and 2016, and groundwater samples were collected at well MW-11, which was retained for periodic monitoring under the environmental covenant, from 2009 to 2016. Vapor sampling included both sub-slab and indoor air, and was conducted in 2008 and 2014 through 2016.

These historical investigations are described in detail, including sample location maps and data tables, in the 2016 Remedial Investigation report.

Cleanup actions

The cleanup action in the South Gas Station area included the excavation and removal of approximately 100 tons of contaminated soil associated with removal of the USTs and other former gas station facilities. Contaminated soil was removed to a depth of at least 15 feet below ground surface (bgs). The 2016 Remedial Investigation report indicated that a vapor barrier was installed as an engineering control beneath the building slab when it was extended to the south in 2016 (i.e., beneath the current coffee shop); the vapor barrier did not extend beneath the patio area south of the building.

Cleanup work in the former Paint Booth area included cleaning of drains, cleanouts, and one heating oil UST in 1994, and offsite disposal of the contents and rinse water. The drains, cleanouts, and UST were then closed in place by filling with concrete slurry.

Groundwater monitoring

Groundwater monitoring has been performed historically in the South Gas Station and former Paint Booth areas. Currently, only one well remains on the Site, MW-11 located inside the Thriftway store. Depth to groundwater at the Site is approximately 50 feet.

One well, MW-1, was located in the South Gas Station area. The well was monitored between 2007 and 2014 and decommissioned in 2016 after sampling results demonstrated compliance with MTCA groundwater cleanup standards.

Well MW-11 was installed in the former Paint Booth Area in 2009. Groundwater monitoring was performed between 2009 and 2016, with no Site contaminants detected at concentrations above MTCA Method A. Arsenic was detected at a concentration slightly above the MTCA Method A cleanup level, but likely represents background conditions and is not considered to be a contaminant of concern for the Site. MW-11 was retained for long-term monitoring under the Covenant.

Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site.

[WAC 173-340-704](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704)⁹ states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set cleanup levels only at industrial sites.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site (standard point of compliance).

The Site has a conditional point of compliance for groundwater, which was established at monitoring well MW-11, located inside the Stadium Thriftway store.

Environmental Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human health and the environment. On December 12, 2017, institutional controls in the form of an

⁹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704>

[environmental covenant](#)¹⁰ (Covenant) were recorded for the Site. The requirements of the Covenant are summarized in the Property NFA letter issued by Ecology on January 9, 2018.

The Covenant recorded for the Site imposes the following limitations:

1. Limitations on extraction of groundwater.
2. Containment of residual contaminants in soil by use and maintenance of a pavement cap including the existing building and a portion of the paved sidewalk and roadway as depicted on the maps in Appendix B.
3. Periodic inspection of the pavement cap outside the building (inspection of the building cap was not required).
4. Continued long term groundwater compliance monitoring at well MW-11.

Periodic Review

Effectiveness of completed cleanup actions

As part of this periodic review, Ecology conducted a site visit on December 15, 2023. The Site is currently operating as a retail shopping center. The February 2024 report lists the current property use as Stadium Center and indicates that current retail tenants include Stadium Thriftway, Jimmy Johns, Mud Bay, and Starbucks.

Site visit observations are included in the discussion below. A photo log is provided in Appendix C.

Direct contact

The cleanup actions were intended to eliminate exposure to contaminated media at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by engineered controls including the building and pavement cap. The cap appears to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time, except as noted below.

The inspection and sampling reports indicate that the building and pavement caps are intact and unchanged. This conclusion is consistent with Ecology's observations during the December 2023 site inspection. Markers at each corner of the Covenant area (see Appendix B maps) were located and are intact, except for Marker D which was not found. Based on maps and photographs provided in previous reports, the approximate location of Marker D was identified in the field. It appears that the marker (described as a rebar cap) may have been buried under landscaping bark and topsoil. The previous maps and photographs were sufficient to identify

¹⁰ <https://apps.ecology.wa.gov/cleanupsearch/document/74645>

the corner of the Covenant area for the purposes of inspection. **Ecology recommends reinstalling the marker if it is not found during the next inspection event.**

As noted in the monitoring reports, the Covenant area includes landscaped areas maintained by the City of Tacoma. These areas are located south of the main building and paved patio area (see photographs in Appendix C) and were reportedly installed prior to the Covenant. The monitoring reports conclude that the landscaped areas do not compromise the integrity of the remedy based on the depth to contaminated soil (>15 feet; i.e., protective of the direct contact pathway) and lack of TPH and related impacts to groundwater at well MW-11 (i.e., protective of the leaching pathway). This interpretation is consistent with the historical sampling data provided in the previous reports and with the long-term groundwater monitoring results. In addition, most of former south gas station area, including the former UST locations, is under the fully paved sections.

Ecology generally concurs with these conclusions regarding the landscaped areas within the Covenant boundaries, but cautions that the landscaped areas present a greater potential for infiltration and leaching from the former Gas Station Area. If any Site contaminants are detected in future groundwater samples at MW-11, Ecology may request additional investigation to evaluate the leaching pathway.

Protection of groundwater

Soils with TPH and related contaminants at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed. The Covenant requires groundwater monitoring at one location, well MW-11 located inside the Stadium Thriftway store, at a 24-month frequency.

Since the Covenant was established in December of 2017, three groundwater monitoring events have been completed. The monitoring events included inspection of the well, measurement of depth to groundwater, and collection of groundwater samples for analysis of TPH-G, TPH-D, TPH-O, and VOCs. The monitoring dates included October 15, 2019, February 23, 2021, and December 15, 2023. Note that three monitoring events are included in this periodic review because of the delayed schedule as discussed above. Future periodic review periods for this site are anticipated to include only two groundwater monitoring events following the 2-year sampling interval established in the Covenant.

During the first periodic review period, TPH-G, TPH-D, TPH-O and benzene, toluene, ethylbenzene and xylenes (collectively, BTEX) were not detected above the laboratory reporting limits for any of the sampling events.

TCE was detected during each monitoring event, but at concentrations below the MTCA Method A groundwater cleanup level [(1.8 to 2.2 micrograms per liter ($\mu\text{g/L}$)). The monitoring reports suggest that the TCE is likely associated with the Morrells Dry Cleaners site, located north of the Thriftway building, which is consistent with the available information for the Morrells site. No other halogenated VOCs were detected above the laboratory reporting limits.

Chloroform was detected in groundwater samples collected in 2021 and 2023 at concentrations of 1.2 µg/L and 6.5 µg/L, exceeding the MTCA Method B groundwater cleanup level of 1.4 µg/L. The monitoring reports indicate that there are no known current or historical onsite sources of chloroform, and suggests that it may also be associated with the Morrells site. Ecology is not requesting any additional evaluation of chloroform at this time, but if it continues to be present at MW-11 at concentrations above the MTCA cleanup level Ecology may request additional evaluation in the future.

Ethylene dibromide (EDB) was detected in the December 15, 2023, sample at 0.013 µg/L (slightly exceeding the MTCA Method A cleanup level) but with a laboratory data flag indicating that the analyte was detected in the method blank. The sample was reanalyzed by the laboratory and EDB was not detected. EDB was not detected in the previous two sampling events. If EDB is detected in future monitoring events, additional evaluation may be requested by Ecology. In particular, future detections of EDB could indicate leaching from impacted soils remaining beneath the Covenant cap area.

Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2017. The Covenant remains active and discoverable through the Pierce County Assessor's office. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant. This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of the property that is inconsistent with the Covenant, unless approved by Ecology in advance. This Covenant ensures the long-term integrity of the cleanup action will be protected.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected Site and resource uses

The Site is used for commercial purposes. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

Availability and practicability of more permanent remedies

The remedy implemented included containing hazardous substances, and it continues to be protective of human health and the environment. While more permanent remedies may be available, they are still not practicable at this Site.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the cleanup action were capable of detection below the selected MTCA cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- Groundwater compliance monitoring at the Site indicates all contaminants of concern are below MTCA cleanup levels.
- The Covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional cleanup actions are required by the property owner at this time. The property owner is responsible for continuing to inspect the Site and monitor groundwater to ensure the integrity of the cleanup action is maintained.

Next review

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

References

TRC, *Cap Integrity and Groundwater Monitoring Report*, February 2, 2024.

Ecology, Site visit by Dean Malte, December 15, 2023.

TRC, *Cap Integrity and Groundwater Monitoring Report*, March 22, 2021.

Environmental Partners Inc, *Cap Integrity and Groundwater Monitoring Report*, February 27, 2020.

Ecology, *Opinion on Property Cleanup - No Further Action*, January 9, 2018.

Ecology, *Environmental Covenant*, recorded December 12, 2017.

Ecology, *Opinion on Site Cleanup - No Further Action Likely*, April 11, 2017.

Aspect Consulting, *Remedial Investigation and Feasibility Study*, July 25, 2016.

Ecology, *Opinion on Site Cleanup – Further Action*, November 17, 2014.

Appendix A. Vicinity Map



NOTES:

N

SOURCE: USGS 7.5 MINUTE QUADRANGLE (TOPOGRAPHIC)
 TACOMA NORTH, WA
 TACOMA SOUTH, WA
 POVERTY BAY, WA
 2017
 SCALE = 1:24,000



1180 NW MAPLE ST, SUITE 310
 ISSAQUAH, WA 98027
 WWW.TRCCOMPANIES.COM
 425.395.0010

FIGURE 1
 GENERAL VICINITY MAP

REPORT
 CAP INTEGRITY AND
 GROUNDWATER
 MONITORING REPORT

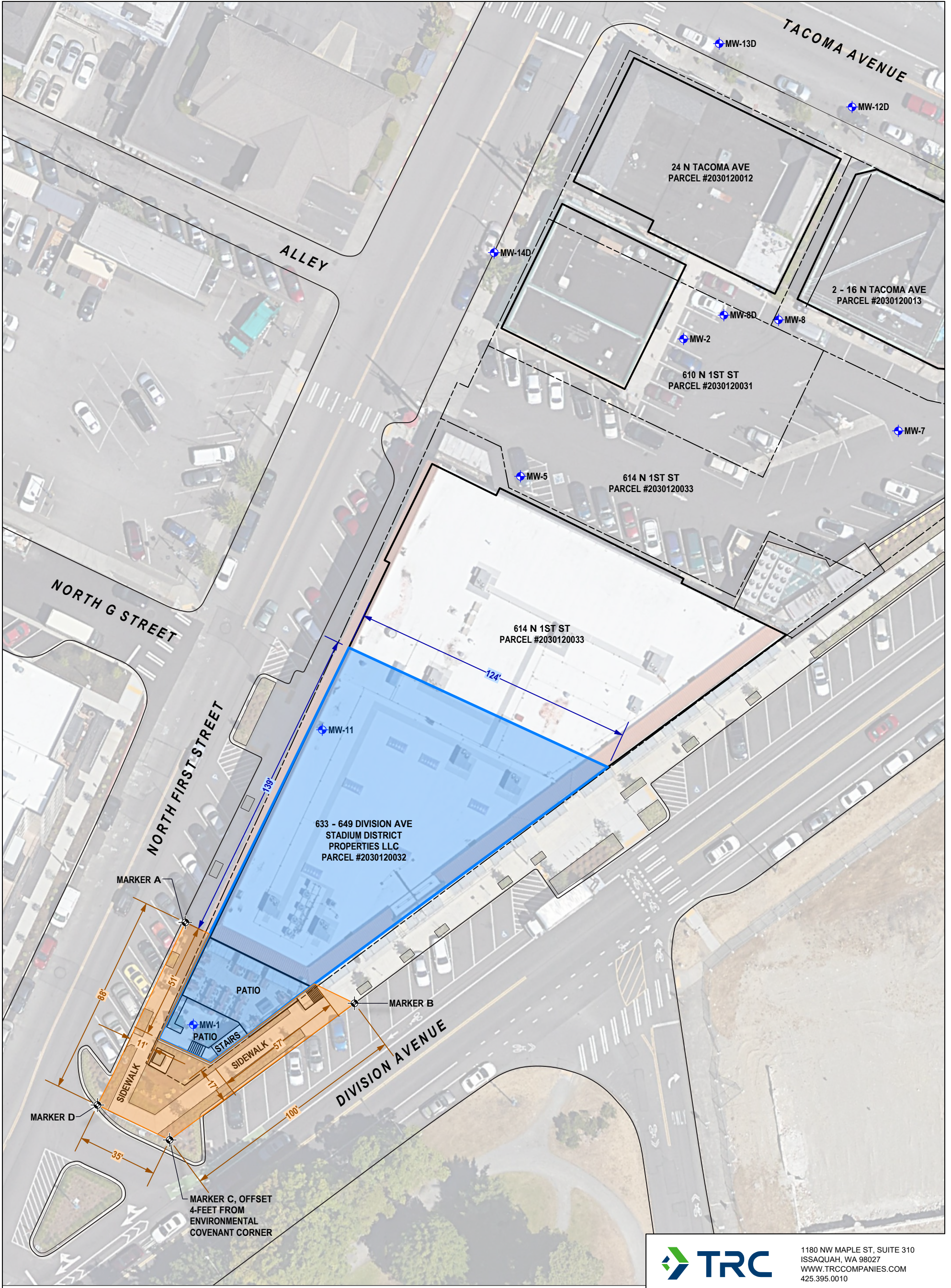
PREPARED FOR
 WACTOR & WICK

LOCATION
 633 DIVISION AVENUE
 TACOMA, WASHINGTON

PROJECT NUMBER
 430528

DATE 3/1/21
DRAWN BY VPB
REVIEWED BY DCK

Appendix B. Site Plans



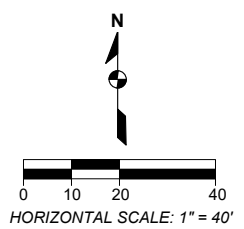
- NOTES:**
- PAVEMENT CAP
 - BUILDING CAP
 - PARCEL BOUNDARY (PIERCE COUNTY GIS)
 - MONITORING WELL LOCATION
 - ENVIRONMENTAL COVENANT MARKER LOCATION

BUILDING CAP LOCATIONS APPROXIMATED FROM EXHIBIT C (MAP ILLUSTRATING LOCATION OF RESTRICTIONS) BY ASPECT CONSULTING JULY 2017

AERIAL PHOTO: GOOGLE EARTH, MAY 2018

PARCEL BOUNDARIES APPROXIMATED FROM PIERCE COUNTY, WASHINGTON GIS MAPS

ALL SITE FEATURES ARE APPROXIMATED FROM FIGURES FROM ASPECT CONSULTING, PIERCE COUNTY GIS, AND GOOGLE EARTH AERIAL PHOTOGRAPHY

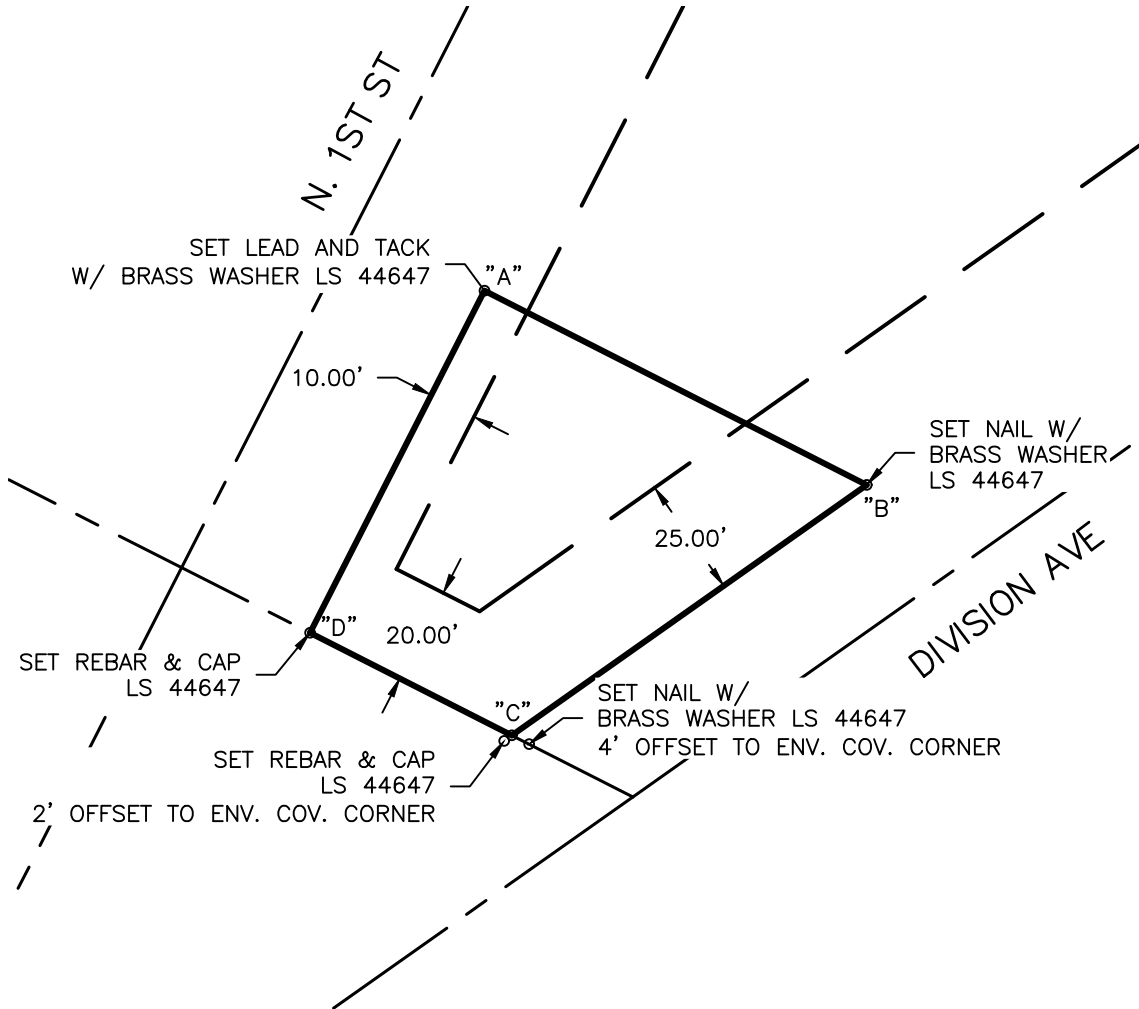


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FIGURE 2
 SITE REPRESENTATION WITH ENVIRONMENTAL COVENANT CAP LOCATIONS

<p>REPORT CAP INTEGRITY AND GROUNDWATER MONITORING REPORT</p>	<p>PREPARED FOR WACTOR & WICK</p>
<p>LOCATION 633 DIVISION AVENUE TACOMA, WASHINGTON</p>	<p>PROJECT NUMBER 430528</p>
	<p>DATE 3/1/21</p> <p>DRAWN BY VPB</p> <p>REVIEWED BY DCK</p>

ENVIRONMENTAL COV. EXHIBIT



"A" NORTHING 709832.45
 EASTING 1156493.60

"B" NORTHING 709791.98
 EASTING 1156573.25

"C" NORTHING 709739.81
 EASTING 1156499.32

"D" NORTHING 709761.18
 EASTING 1156457.26



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Civil | Structural | Planning | Survey
 paceengrs.com



1"=40'

SCALE: 1"=40' FILE: V19564-BNDRY DATE: 12/19/19 JFS PROJ. NO.: 19564

Appendix C. Photo Log

Photo Log

Facility Name: Bruce Titus Chevrolet
CSID: 5318
Date: 12/15/23

Photographer: Dean Malte
Lead Inspector: Dean Malte
Camera Type/Model: iPhone 12
Page 1 of 4



Photograph	Description
 A wide-angle photograph showing a two-story building with a red-tiled roof and a sign that reads "BUCE TITUS". The building is situated on a street corner. In the foreground, there is a paved sidewalk, a landscaped area with trees and shrubs, and a street with a stop sign and a "ONE WAY" sign. The sky is clear and blue.	<p>1. View of property from the south, looking northeast.</p>
 A photograph showing a close-up view of a concrete sidewalk and a courtyard area. The sidewalk is made of large concrete slabs. In the background, there is a building with large glass windows and a dark metal frame. The courtyard area is paved and has some concrete blocks or steps. The sky is clear and blue.	<p>2. View of sidewalk west of building and courtyard south of building, looking northeast.</p>

Photo Log

Facility Name: Bruce Titus Chevrolet
CSID: 5318
Date: 12/15/23

Photographer: Dean Malte
Lead Inspector: Dean Malte
Camera Type/Model: iPhone 12
Page 2 of 4



Photograph	Description
	<p>3. Paved courtyard area south of building, approximate former serviced station location, view to the east.</p>
	<p>4. Well MW-11, located inside grocery store storage room.</p>

Photo Log

Facility Name: Bruce Titus Chevrolet
CSID: 5318
Date: 12/15/23

Photographer: Dean Malte
Lead Inspector: Dean Malte
Camera Type/Model: iPhone 12
Page 3 of 4



Photograph	Description
	<p>5. Marker A, located in sidewalk near southwest building corner (circled).</p>
	<p>6. Marker B, located in roadway near southwest corner of building (left of front truck tire, circled).</p>

Photo Log

Facility Name: Bruce Titus Chevrolet
CSID: 5318
Date: 12/15/23

Photographer: Dean Malte
Lead Inspector: Dean Malte
Camera Type/Model: iPhone 12
Page 4 of 4



7. Marker C, in asphalt to the left of the catch basin, southeast corner of covenant area (circled), marker is offset 4 feet east from the EC area corner.



8. Marker D location, presumed buried under bark near rock in center of photo, marker not located but location identified from photos and maps provided in reports, southwest corner of covenant area.