



First Periodic Review AMG Investments Group

11214 Pacific Ave S, Tacoma, WA 98444

Facility Site ID: 4106, Cleanup Site ID: 12396

Toxics Cleanup Program, Southwest Region

Washington State Department of Ecology
Lacey, Washington

November 2024

Document Information

This document is available on the Department of Ecology's AMG Investments Group cleanup site search page.¹

Related Information

- Facility Site ID: 4106
- Cleanup Site ID: 12396

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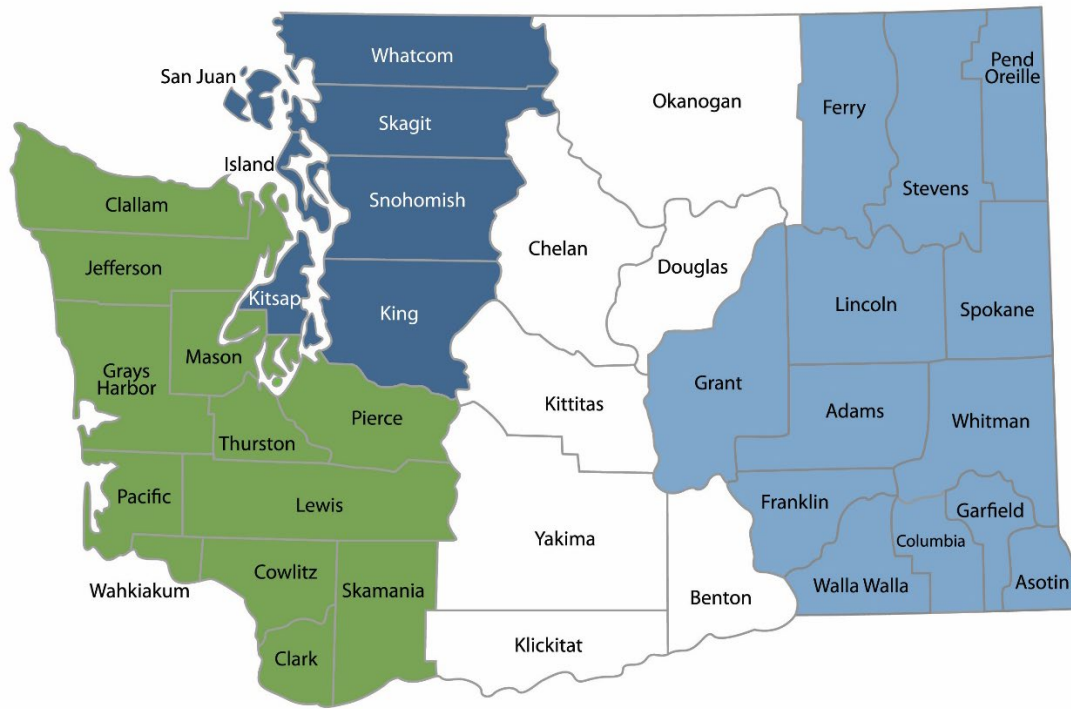
¹ <https://apps.ecology.wa.gov/cleanupsearch/site/12396>

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 AMG Investments Group cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the first periodic review conducted for this Site.

Cleanup activities at this Site were completed under Voluntary Cleanup Program (VCP) project VCP SW1404. Residual concentrations of petroleum hydrocarbons and diesel into the soil only, and benzene into the air/soil vapor exceeded MTCA cleanup levels and remain on the property. The MTCA cleanup levels for soil and groundwater are established under WAC 173-340-740⁴ and WAC 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. WAC 173-340-420(2)⁶ requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because institutional and engineered controls remain in place at the Property (and Site). A no further action determination was issued by Ecology in an opinion letter dated July 18, 2018.

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 present at the site.
- 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.

Generally, Ecology publishes a notice of periodic reviews in the *Site Register* and can choose to provide an opportunity for public comment.

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>

Summary of Site Conditions

A detailed Site description and history, site investigations summary, and cleanup actions summary are found in the various documents associated with CSID 2010. A brief summary of each is presented here.

Site description and history

In October 2013, four soil borings, B1 through B4, were advanced as part of a Phase II Environmental Site Assessment (ESA) around a now removed heating oil underground storage tank (UST) at the Site. Total petroleum hydrocarbons in the diesel range were found at concentrations in soil up to 66,000 milligrams per kilogram (mg/kg). The now removed heating oil UST was found present to the northwest corner of the facility building, adjacent to a concrete vault and storage room addition.

A vicinity map is in Attachment A, and a Site plan is in Attachment B.

Site investigations

In August 2015, one boring was advanced to 41 feet below ground surface (bgs). Soils were sampled at 20, 25, 30, and 40 feet bgs, and analyzed for petroleum as diesel, kerosene, and heavy oil. No petroleum was detected. Groundwater was not encountered.

No groundwater was present at the Site, and this pathway does not have to be considered for the periodic review.

Air sampling was completed in September 2017. Concentrations of all Site contaminants were less than the MTCA Method B cleanup levels, except for benzene in crawl space air. Based on the adjusted benzene in air site-specific cleanup level calculated for the Site, the concentrations of benzene in air complied with the new cleanup level.

Cleanup actions

A steel 500-gallon heating oil UST was removed in December 2013.

Contaminated soil was removed by excavation to the extent practicable in December 2013, totaling 147.8 tons. Disposal occurred at Pierce County's LRI landfill. Selected petroleum contaminated soil could not be removed at soil sampling location TP2 at 12 feet bgs, TP5 at 12 feet bgs, and TP8 at 17 feet bgs. TP2 and TP5 were collected from the east and south excavation sidewalls, respectively, and TP8 was collected from the excavation floor. Concentrations of diesel in soil exceed the MTCA Method A cleanup level at all three locations.

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)⁷ 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 soil and air cleanup levels at industrial sites, but those do not apply at this Site.

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 point of compliance for air/soil vapor is ambient and indoor air. Groundwater was determined to not be present at the Site.

Environmental/Restrictive 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 July 12, 2018, institutional controls in the form of an environmental covenant⁸ were recorded for the Site.

The environmental covenant recorded for the Site imposes the following limitations:

1. Land use must stay commercial.
2. Maintain the described cap.
3. Prohibit installation of groundwater supply wells.
4. Complete air compliance monitoring and cap monitoring.

Periodic Review

Effectiveness of completed cleanup actions

⁷ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704>

⁸ <https://apps.ecology.wa.gov/cleanupsearch/document/75937>

Ecology conducted a site visit on November 8, 2023. Representatives from Ecology, and AMG Investments Group met at the Site. The Property is currently operating as a store, in the same way as observed in December 2017, and as reported at the time of the no further action opinion letter issued on July 18, 2018. Ground cover and property features remain the same. As observed during the Site visit, Site conditions are unchanged since the issuance of the no further action. The storage room, per discussion with the Property owner and observed conditions during the site visit, is accessed only a few times a year. A photo log is in Attachment C.

Direct contact

The cleanup actions were intended to eliminate exposure to contaminated soil and soil gas/vapor at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by capping with soil and the building. The building and gravel cover appear to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time.

Protection of Air/Vapor

Vapor intrusion is mitigated by 1) the agreed to Site-specific cleanup level for benzene in air at the Site; 2) limiting time in the storeroom most likely to be affected by any vapor intrusion; 3) implementation of the air compliance monitoring plan for the Site.

Additional air monitoring was completed in March 2024, with samples collected in the crawl space, in the storeroom, and ambient air. During the site visit on November 8, 2023, Ecology observed that the storeroom was used for storage only and was unoccupied. Per the property owner, the storeroom continues to be used for less than one hour a week. Based on Ecology's observations during the Site visit, the property owner's report appears accurate.

The benzene in air cleanup level for the Site is site-specific at 4.81 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). Concentrations of benzene in air based on the March 2024⁹ vapor monitoring were less than the site-specific cleanup level and less than concentrations in ambient air. The remedy remains protective.

Institutional controls

Institutional controls in the form of an environmental covenant were implemented at the Site in 2018. The environmental 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 environmental covenant. This environmental 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

⁹ March 2024 event reported in Aerotech's Vapor Monitoring Report dated April 22, 2024.

environmental covenant, unless approved by Ecology in advance. This environmental 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

Ecology issued a new vapor intrusion guidance in March 2022.¹⁰ Otherwise, there is no new relevant scientific information for the hazardous substances remaining at the Site.

Air monitoring was completed at the Site on March 21, 2024. Concentrations of APH, BTEX, and naphthalene continued to be less than cleanup levels.

Concentrations of benzene in air were:

<u>Sample ID/Location</u>	<u>Benzene Concentration (µg/m³)</u>
Interior	0.802
Crawl Space	0.604
Exterior (Background a.k.a. ambient)	8.65

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. However, the cleanup level for petroleum hydrocarbons in air (APH) for the Site has been revised and is proposed at 2,720 µg/m³. Petroleum was not detected in crawl space or interior air.

Current and projected Property Site and resource uses

The Property is used as a store. The storage room is the same as observed during a VCP project site visit in December 2017. During the November 8, 2023 site visit, ground cover and building configuration looked the same as the past Site visit and at the time of issuing the no further action opinion letter in July 2018.

The features observed constitute the cap, which remains in place in the same configuration since issuance of the no further action determination. There have been no changes in current

¹⁰ Ecology publication 09-09-047, Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action, Revised March 2022. <https://apps.ecology.wa.gov/publications/SummaryPages/0909047.html>

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.

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 sufficiently 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, since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- Air/soil vapor analytical results meet the site-specific cleanup levels and continue to remain protective at the Site.
- Site-specific MTCA Method B cleanup levels have been met for crawl space and storage room air for those contaminants related to the residual heating oil in soil from 12 and 17 feet bgs.
- The institutional controls and environmental covenant are still needed for the currently inaccessible petroleum contaminated soil at the Site that exceed the cleanup level. Therefore, periodic reviews are still needed at the Site.
- The environmental 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.
- To obtain an unencumbered or “clean” no further action at the Site, contaminated soil would need to be removed if ever exposed during a property re-development. Confirmatory soil sampling would be needed to confirm the successful removal to concentrations less than Site cleanup levels.

Based on this periodic review, Ecology has determined the requirements of the environmental 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 to ensure the integrity of the cleanup action is maintained. Please continue to monitor air as required under the July 2018 Site No Further Action opinion letter, environmental covenant, and long-term air compliance monitoring plan. Air monitoring would best be completed on a schedule of approximately once every 18 months after issuance of this periodic review report.

Next review

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

Site Contaminants Cleanup Levels

Table 1. Cleanup levels for Site contaminants.

Contaminant	Soil cleanup level (mg/kg)	Air (µg/m ³)
TPH (diesel and heavy oil)	2,000	2,720
Benzene	0.03	4.81
Naphthalene	5	1.10

mg/kg = milligrams per kilogram

µg/m³ = micrograms per cubic meter

TPH = total petroleum hydrocarbons

References

Aerotech Environmental Consulting, Inc., Vapor Monitoring Report, 1st-Quarter 2024, April 22, 2024.

Ecology, Site visit, November 8, 2023.

Ecology, Periodic Review Process Early Notification Letter, September 25, 2023.

Ecology, Re: No Further Action at the following Site, July 18, 2018.

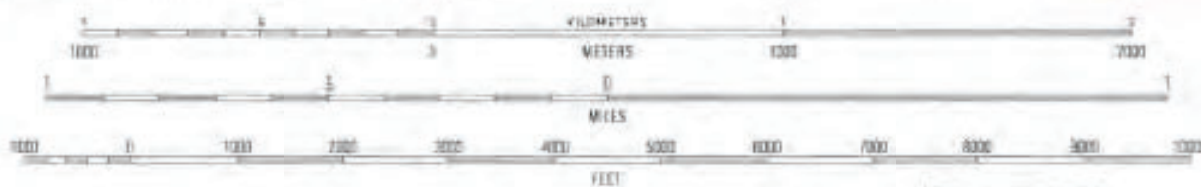
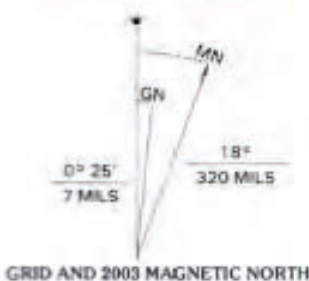
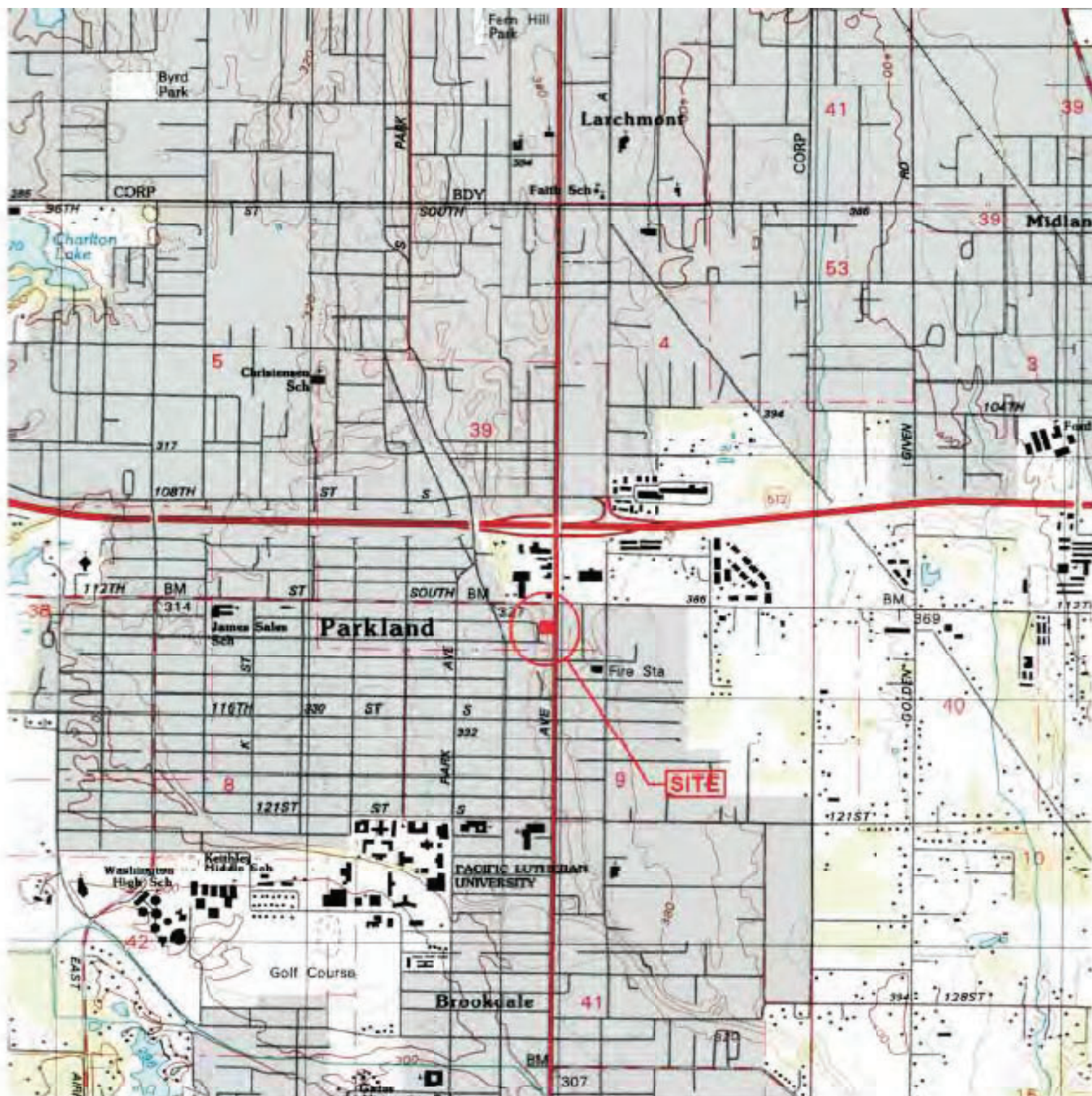
Environmental Covenant recorded with Pierce County, July 12, 2018.

Aerotech, Air Compliance Monitoring Plan, April 30, 2018.

Aerotech, Request for No Further Action, February 28, 2018.

Aerotech, Vapor Intrusion Assessment and Cleanup Action Plan, February 28, 2018.

Attachment A. Vicinity Map



Scale : Feet (20 foot contour interval, 10 foot supplemental dashed interval)



Attachment B. Site Plan



EXPLANATION

●	Green symbols indicate petroleum hydrocarbon concentrations below the MTCA Method A Cleanup Levels in soil	●	Red symbols indicate petroleum hydrocarbon concentrations above the MTCA Method A Cleanup Levels in soil
B-ECY	Soil Boring Location	TP14	Soil Sample Location
Crawl Space West	Air Sample	Roof Extraction Vent Fan	Roof Extraction Vent Fan
Window Air Conditioning Unit	Window Air Conditioning Unit	Swinging Doors Front & Side Entry	Swinging Doors Front & Side Entry
Cash Register	Cash Register	Ceiling Vents Pushing Air Out	Ceiling Vents Pushing Air Out

Attachment C. Photo Log

Photo Log

Facility name: 4106
CSID: 12396
Date: 11/8/2023

Photographer: Tim Mullin
Lead Inspector: Tim Mullin
Camera Type/Model: iPhone 11
Page 1 of 2

Photograph	Description
	Storeroom over crawl space.
	Outside of storage room, concrete vault and gravel ground cover, looking south.

Photo Log

Facility name: 4106

CSID: 12396



Date: 11/8/2023

Photographer: Tim Mullin

Lead Inspector: Tim Mullin

Camera Type/Model: iPhone 11

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Photograph	Description
	Concrete vault and gravel surface, looking north. Crawl space and storeroom addition in right half of photograph.
	Close up of concrete vault, storeroom, and crawl space.