



# UNDERGROUND STORAGE TANK Closure and Site Assessment Notice

See back of form for instructions

FOR OFFICE USE ONLY	
Site ID #:	_____
Facility Site ID #:	_____

Please ✓ the appropriate box(es)

☐ Temporary Tank Closure ☐ Change-In-Service ☐ Permanent Tank Closure ☒ Site Check/Site Assessment

## Site Information

Site ID Number 8624 and TAG # A4954  
(Available from Ecology if the tanks are registered)

Site/Business Name MAIN STREET GROCERY  
Street

Site Address 901 MLK JR WAY

City/State TACOMA, WA

Zip Code 98405 Telephone ( ) \_\_\_\_\_

Owners Signature JASURSGIK

## Owner Information

UST Owner/Operator \_\_\_\_\_

Mailing Address \_\_\_\_\_  
Street

P.O. Box \_\_\_\_\_

City/State \_\_\_\_\_

Zip Code \_\_\_\_\_ Telephone ( ) \_\_\_\_\_

## Tank Closure/Change-In-Service Company

Service Company \_\_\_\_\_

Certified Supervisor \_\_\_\_\_ Decommissioning Certification No. \_\_\_\_\_

Supervisor's Signature \_\_\_\_\_ Date \_\_\_\_\_

Address \_\_\_\_\_

Street P.O. Box

City State Zip Code Telephone ( ) \_\_\_\_\_

## Site Check/Site Assessor

Certified Site Assessor GEORGE R. WEBSTER, P.E.

Address 16355 DENSMORE AVE. NORTH

Street P.O. Box

SHORELINE WA 98133 Telephone 2065422218

City State Zip Code

## Tank Information

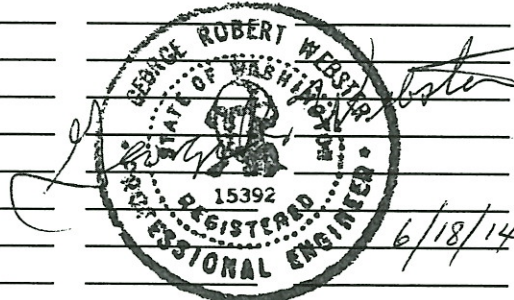
### Contamination Present at the Time of Closure

☐ Yes ☒ No ☐ Unknown ASSESSMENT  
Check unknown if no obvious  
contamination was observed  
and sample results have not  
yet been received from  
analytical lab.

If contamination is present,  
has the release been reported  
to the appropriate regional  
office?

☐ Yes ☐ No

If contamination is present,  
has the release been reported  
to the appropriate regional  
office?



To receive this document in an alternative format, contact the Toxics Cleanup Program at 360-407-7170 (voice) or 1-800-833-6388 OR 711 (TTY)



## UNDERGROUND STORAGE TANK Site Check/Site Assessment Checklist

FOR OFFICE USE ONLY

Site #:

Facility Site ID #:

### INSTRUCTIONS

When a release has not been confirmed and reported, this Site Check/Site Assessment Checklist must be completed and signed by a person certified by ICC or a Washington registered professional engineer who is competent, by means of examination, experience, or education, to perform site assessments. The results of the site check or site assessment must be included with this checklist. This form must be submitted to Ecology at the address shown below within 30 days after completion of the site check/site assessment.

**SITE INFORMATION:** Include the Ecology site ID number if the tanks are registered with Ecology. This number may be found on the tank owner's invoice or tank permit.

**TANK INFORMATION:** Please list all tanks for which the site check or site assessment is being conducted. Use the owner's tank ID numbers if available, and indicate tank capacity and substance stored.

**REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT:** Please check the appropriate item.

**CHECKLIST:** Please initial each item in the appropriate box.

**SITE ASSESSOR INFORMATION:** This information must be signed by the registered site assessor who is responsible for conducting the site check/site assessment.

Underground Storage Tank Section  
Department of Ecology  
PO Box 47655  
Olympia WA 98504-7655

### SITE INFORMATION

Site ID Number (Available from Ecology if the tanks are registered):

ID# 8624 & TAB # A4954

Site/Business Name:

MAIN STREET GROCERY

Site Address:

901 MARTIN LUTHER KING JR. WAY

Telephone: ( )

TACOMA

Street

WA

98405

City

State

Zip Code

### TANK INFORMATION

Tank ID No.

Tank Capacity

FORMERLY  
Substance Stored

#1

10K GALLONS

GASOLINE

#2

10K GALLONS

GASOLINE

### REASON FOR CONDUCTING SITE CHECK/SITE ASSESSMENT

Check one:

- ☒ Investigate suspected release due to on-site environmental contamination.  
☐ Investigate suspected release due to off-site environmental contamination.  
☐ Extend temporary closure of UST system for more than 12 months.  
☐ UST system undergoing change-in-service.  
☐ UST system permanently closed with tank removed.  
☐ Abandoned tank containing product.  
☐ Required by Ecology or delegated agency for UST system closed before 12/22/88.  
☐ Other (describe):



# CHECKLIST

Each item of the following checklist shall be initiated by the person registered with the Department of Ecology whose signature appears below.

	YES	NO
1. The location of the UST site is shown on a vicinity map.	SW	
2. A brief summary of information obtained during the site inspection is provided. (see Section 3.2 in site assessment guidance)	SW	
3. A summary of UST system data is provided. (see Section 3.1.)	SW	
4. The soils characteristics at the UST site are described. (see Section 5.2)	SW	
5. Is there any apparent groundwater in the tank excavation?		SW
6. A brief description of the surrounding land use is provided. (see Section 3.1)		SW
7. Information has been provided indicating the number and types of samples collected, methods used to collect and analyze the samples, and the name and address of the laboratory used to perform the analyses.	SW	
8. A sketch or sketches showing the following items is provided:		
- location and ID number for all field samples collected	SW	
- groundwater samples distinguished from soil samples (if applicable)	N/A	
- samples collected from stockpiled excavated soil	N/A	
- tank and piping locations and limits of excavation pit	N/A	
- adjacent structures and streets	SW	
- approximate locations of any on-site and nearby utilities	SW	
9. If sampling procedures different from those specified in the guidance were used, has justification for using these alternative sampling procedures been provided? (see Section 3.4)	N/A	SW
10. A table is provided showing laboratory results for each sample collected including: sample ID number, constituents analyzed for and corresponding concentration, analytical method and detection limit for that method.	SW	
11. Any factors that may have compromised the quality of the data or validity of the results are described.		SW
12. The results of this site check/site assessment indicate that a confirmed release of a regulated substance has occurred.		SW

## SITE ASSESSOR INFORMATION

GEORGE R. WEBSTER, P.E. SELF  
 Person registered with Ecology Firm Affiliated with  
 Business Address: 16355 DENSMORE AVE. NORTH Telephone: (206) 542-2218  
 Shoreline WA 98133-5826  
 City State Zip Code

I hereby certify that I have been in responsible charge of performing the site check/site assessment described above. Persons submitting false information are subject to penalties under Chapter 173.360 WAC.

6-18-14

Date

*George R. Webster*

Signature of Person Registered with Ecology







**ENVIRONMENTAL ACTIONS REPORT  
Historical and Recent Activities**

at the

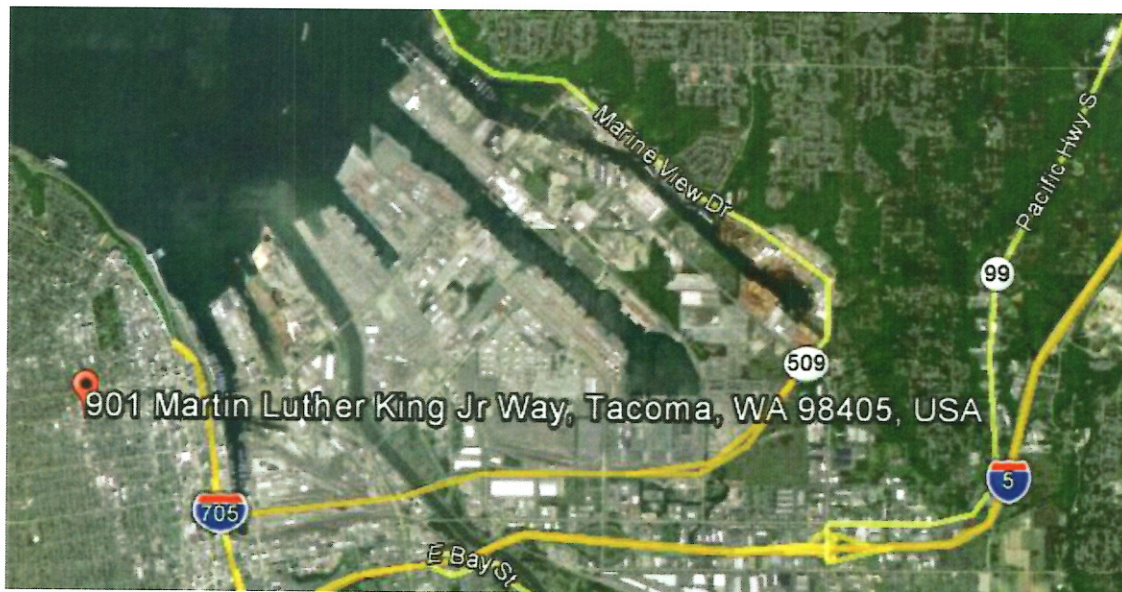
**"Main Street Grocery"  
Formerly a Shell Gas Station  
901 MLK Jr. Way  
Tacoma, Washington 98405**

**Executive Summary**

This Report contains the FINAL "UST Site Assessment Report" together with a summary of all studies and Reports performed in 2014, including a Phase III – Environmental Remedial Clean-up Actions Report, performed by George Webster, P.E., together with the recent "Tightness Testing Report" on the two Underground Storage Tanks (UST's), performed by SME Solutions; a previously conducted "Phase II – Environmental Site Assessment Report" performed by Northwest Environmental Solutions, Inc. (NES); and an Historical Review of the "Ecology File" in Lacey, related to the the Former Gasoline Station located at 901 Martin Luther King Jr. Way, (the Southeast corner of South Ninth Street and Martin Luther King Jr. Way intersection) in Tacoma, Washington.

An aerial photo of the location of the site in Tacoma is shown below.

N ^





**In January through June 2014, the following "environmental activities" were being performed, along with the building remodeling, in order to reopen the former Shell Gasoline Station.**

**In January, Mr. Kevin Wilkerson of Northwest Environmental Solutions, Inc. (NES) conducted a Phase II -- Environmental Site Assessment (ESA) at the site. "Conclusions" of that NES Phase II - ESA investigation were that:**

- "Levels of BTEX were found beneath the asphalt covered area down-gradient from the concrete covered area location having the fill-ports of the tanks. (Benzene on sample 2AE -14' is above MTCA Clean-up levels of 0.030 mg/kg.), and an indication of Heavy Oil levels were found in the soil of the northeast landscaped area down-slope from the dispenser island. It is presently unknown if this contamination was in excess of MTCA Clean-up levels."**

**Those NES Report findings caused the Department of Ecology (ECY) to List the site on the "Confirmed and Suspected Contaminated Sites List" were further testing and possible clean-up is needed. Additional environmental actions were required, and in addition, as the Owners, were remodeling the Station to conform to their operational concepts, they were required by ECY to provide proof of Tank and equipment "Tightness Testing" before they would be allowed to open the Station.**

**In February, George Webster, P.E. was retained to provide direction of necessary technical activities and in obtaining the desired operational permits. Mr. Webster first conducted a Limited Phase I - ESA by reviewing the historical data on-file with the Department of Ecology in Lacey, Washington. Pertinent Data pertaining to the required site investigations are contained in the HISTORICAL DATA section of this Report.**

**In March a Phase III - Environmental ESA was directed by George Webster, P.E., and performed by the staff of NES. Backhoe actions of removal of asphalt surfacing over specific areas were made, and careful excavation exploration performed to identify and define locations of petroleum hydrocarbon contamination. Samples were taken for lab testing.**

**In April, after study of the sample test results, additional site investigations and lab testing efforts were performed to assure that the site was determined to be totally "Clean". The Webster Phase III ESA efforts are contained in the body of this Report.**

**In June, the Owners retained the firm of SME Solutions to perform the required "Tightness Testing" studies. The results of those Tightness Testing studies demonstrated that the UST's, lines and equipment were "Tight".**

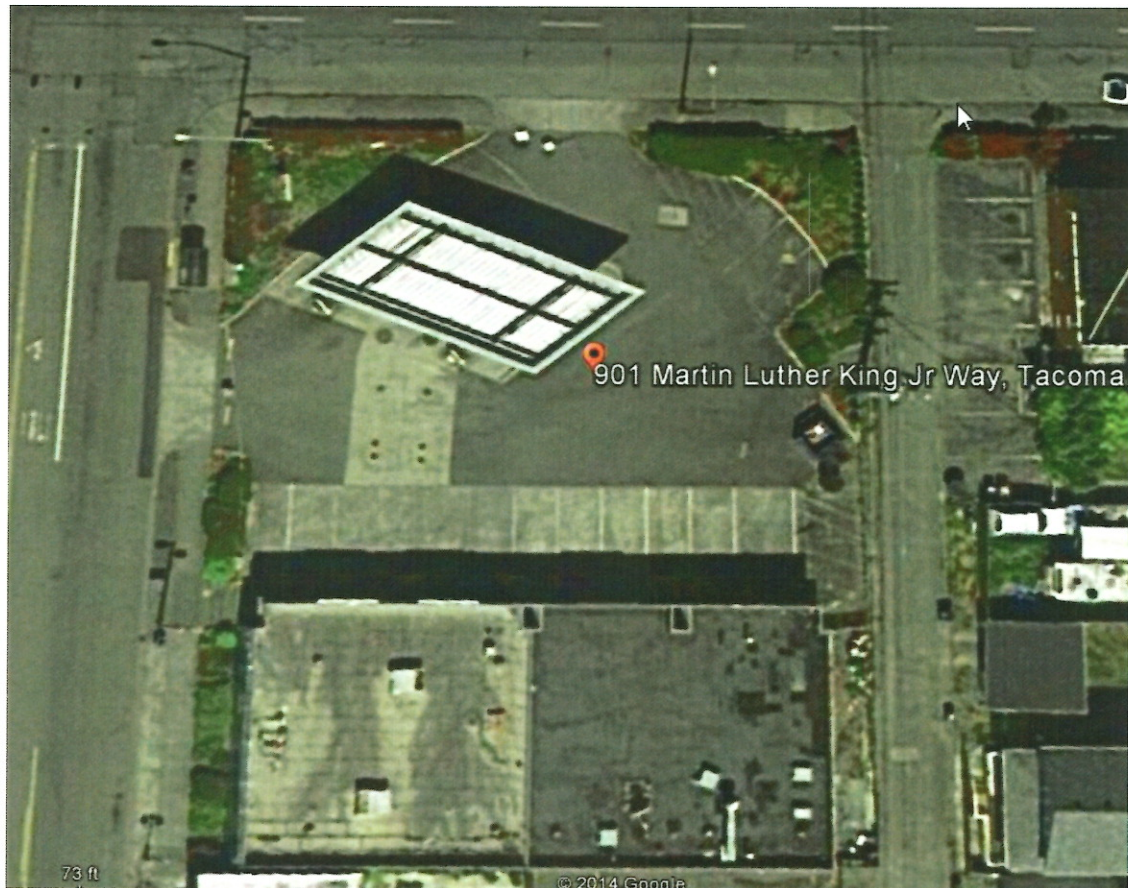
**This "FINAL" UST SITE ASSESSMENT REPORT defines the pertinent "Historical Actions" and contains a presentation and discussion of the "Recent Actions", that demonstrate that this site is now determined to be environmentally "Clean".**

**End of Executive Summary**



## Site Location and Present Site Status

Below is an aerial photo of the present site.

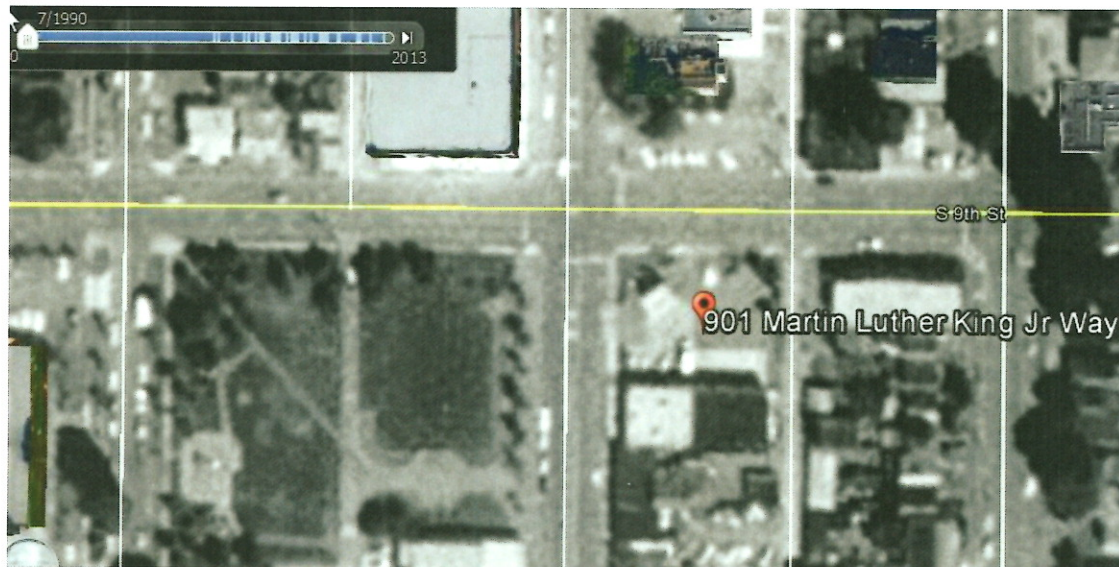


This site is on the Southeast corner of Martin Luther King Jr. Way and South 9<sup>th</sup> Street. The structure extends from the street to the alley, with white painted car parking spaces marked on the asphalt in front of the structure. The site slopes toward the Northeast, and there are a few feet of "drop-off" on the Eastern edge of the site along the alleyway. The bright white and pinkish-tint trapezoidal shaped metal structure is the Canopy over the Pump Island. The Pump Island concrete pad outline may be seen beneath the Canopy. A concrete "strip" exists between the parking spaces and the Pump Island. Six small dark circles show in that concrete "strip". Those are the steel lids that cover the holes of the two 10,000 gallon UST's that lay in a North - South direction. Most all of the remaining site surface is covered with asphalt or landscaping. The gray rectangle to the Northeast of the Pump Island is the steel top of the "Oil/Water" separator. The structure is being remodeled as Market and Convenience Store at this time.



## Historical Data

A review of historical sources and the official file for this Gasoline Station was made in the Lacey office of the Department of Ecology (ECY) to gather information that would be of assistance in the Phase III ESA. Following are data that was considered to be of importance. (Copies of these documents are in consecutive order and located in Appendix A.)



July 1990 aerial view of the site. The "quality" of this photo is "poor", and this is the best focus possible. You may also see on the blue strip (top left of the photo), that there were not any additional photos taken for about 10 years. BUT, note the differences between the present site photo on the precious page and this photo. It "may be seen" (with magnification) that the concrete "strip" atop the three UST's extends toward the East more than is presently there. That was the cover atop the third UST.

Between the time periods of the Station startup date in 1984, until 1998, the ECY File contained very little data. The first document of interest in the File is an 11/10/98, Certified mail Ecology letter to the "Owner", Mr. Ok Park, advising him that the three Underground Storage Tanks at the LUCKY SEVEN (Station I.D. #8614) did not meet new Required Upgrade Requirements and that petroleum could not delivered to the three tanks after December 22, 1998.

The second document in the file was the "cover sheet" and "FIRST PAGE" of a December 28<sup>th</sup> 1999 Phase II – ESA, performed by the Aliso Viejo, CA firm PHASE ONE Inc. for "The Money Store" of Bellevue, WA. The Phase II information on the one page, says that the site was "presently a market facility which was formerly operated as a gasoline station (the Lucky 7) and that the gasoline tanks and pumps are still in-place". Also stated was that "the property was previously occupied by a dry-cleaning facility." This first page of the Phase II – ESA ends with the statement that "In November of 1998, PHASE ONE Inc. performed a Phase II ESA of this property and concluded the following:" – No additional pages of this Report were found in the ECY Files. –GW comment: The pages with the important data were lost !



Other pertinent data included the February 8<sup>th</sup> 1999, UST Closure Report issued by Cetus Engineering of Bellevue (the #3 UST was "Decommissioned-in-Place"), and the Site Assessment Notice" prepared Phase One Inc., both were submitted to the ECY. Mr. Sun Ok Chung was then listed as "Owner".

On February 18<sup>th</sup>, Mr. Roger Davis Jr. of Cetus Engineering, performed services on two remaining UST's for the Owner Mr. Chung. Also Mr. Davis Jr. completed an ECY "UST Retrofit/Repair Checklist", (both submitted to ECY).

April 13<sup>th</sup> 1999, ECY sent a Certified letter to "Main Street Grocery" with Site ID # 8624, reminding the owner that all UST's must be in compliance with the new laws. It is noted that the Station I.D. # 8614 was now issued a new "Compliance TAG number of #A4954".

On 5/5/2004, Mr. Gary A. Smith of the Dept. of Ecology performed an "UST Site Inspection" and issued a "Notice of Noncompliance", as he found that UST #2 sump detector was "not operable".

On 11/3/2005, Mr. Charles Steckman of Northwest Tank & Environmental Services, Inc. performed "Tightness Testing" and found everything "ok", and filed the "Tightness Testing Checklist" with ECY.

Sometime between 2005 and February of 2011, the site had been sold to Ms. Jung Chong. On February 11<sup>th</sup> 2011, Mr. Kevin Jordan of Northwest Tank & Environmental Services, Inc. performed Tightness Testing at the Main Street Grocery with the Owner Ms. Jung Chong present. Whereas the two UST's were tested as "tight", the ATG Tank Monitoring System on the Regular Gas grade tank was inoperable. Ms. Chong was advised of such by Mr. Jordan, and she acknowledged, as she had "signed-off" on the Form.

Numerous ECY visits and communications (written, verbal and Inspections) throughout March, April, May, June and July, attempts were made by ECY to assist Ms. Chong to understand and fix the "problems", because the ATG monitoring system was still not operating correctly, and there was "a possibility that a release may be occurring". Problems arose when ECY found that, Ms. Chong's "Pollution Liability Insurance" had expired on May 31<sup>st</sup> 2011, and was not being renewed. (ECY determined that no Gasoline deliveries had been made after that date, but that both UST's contained Gasoline.)

In July 2011, the Attorney General of Washington filed a lawsuit for the ECY, against Ms. Jung M. Chong. In August, the case was resolved by an Order Granting Summary Judgment on Ms. Chong's failure to serve ECY with the appeal of a \$1,800. "Penalty", which had been leveled against her.

It then appears that ownership of the Gasoline Station site ownership reverted to the mortgage holder.

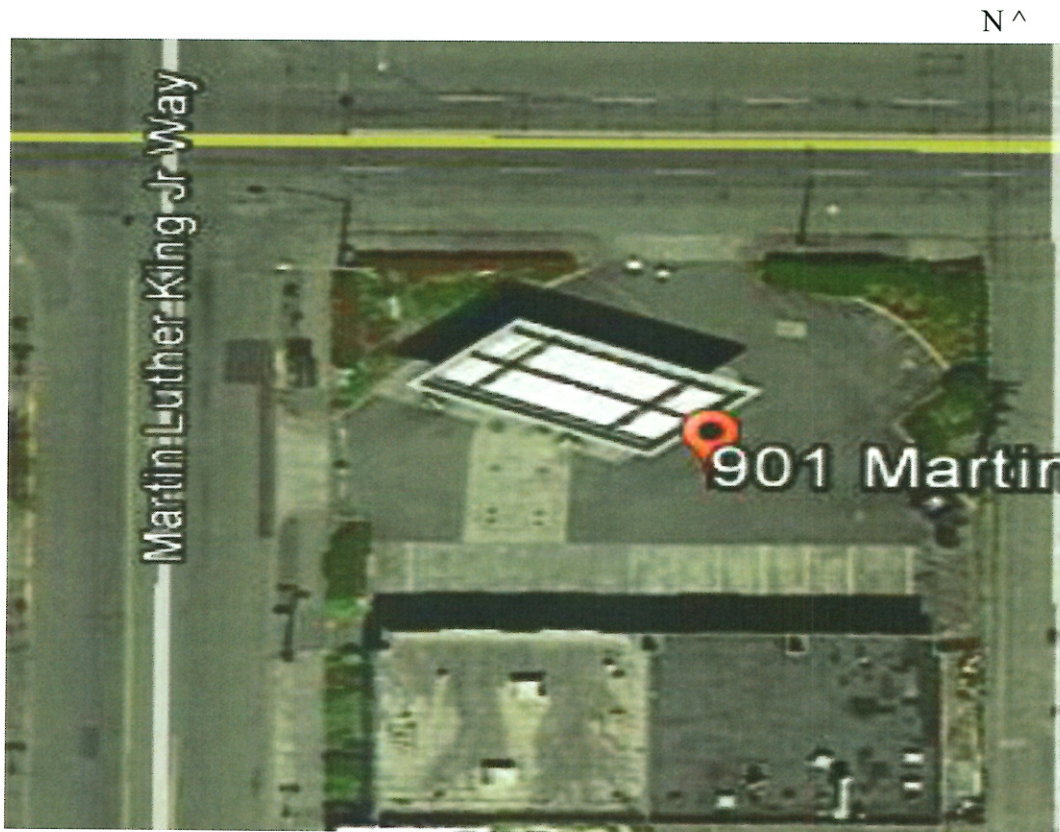
**END OF HISTORICAL DATA REVIEW COMMENTS**



## Recent Activities

### January 2014 Conditions

Shown below is a January 2014 aerial photo of the subject Gas Station property.



Two angled "Islands" having four gas pumps are located beneath the white parallelogram shaped canopy roof. The site slopes slightly toward the NE and the rectangular steel lid of the Oil-Water Separator may be seen near the green landscaping in the NE corner of the asphalt area. Also in the above aerial photo it may be seen, that the two 10,000 gallon single wall Fiberglass Underground Storage Tanks (UST's) are lying in front of the building structure, in a North-South direction under the grayish concrete surface, between the canopy roof structure and the "marked" car parking spaces. These two UST's can be identified by the six small round tank openings (lids) located in the gray concrete pad area.

New owners purchased the bankruptcy site in 2013, but ownership notification was not immediately made to Ecology and lack of knowledge of regulations by the new owners caused problems, as Ecology knew of the past history of there being a "potential of a release" at this site.



**In December of 2013, based on the past history at the site, Ecology required of the new owners, that a Phase II – Environmental Site Assessment be performed by January 15<sup>th</sup> 2014, to determine if there were any existing hazardous conditions at the site. (See Letter contained in "Appendix G".)** *gus*

**In early January, Northwest Environmental Solutions, Inc. (NES) conducted a Phase II -- Environmental Site Assessment (ESA) at the property located at 901 Martin Luther King Jr. Way in Tacoma, Washington 98405. Mr. Kevin Wilkerson, Washington State Registered Site Assessor performed the visual, physical and photographic field inspection, soil collection, analytical laboratory testing and lab test results review.**

**The NES Phase II ESA Report is contained in "Appendix D" of this Report. Following are some excerpts from that Report.** *gus*

==  
The project area consists of a former gasoline station and a vacant building, of which a portion was formerly a convenience store. This Tax Lot is Parcel number 2009210011, and the Lot is approximately a quarter of an acre in size.

The two tanks were installed in 1984, and they have been upgraded to meet Washington State DOE 1998 tank upgrades, (April 1999 – ISIS Data Base). The product lines are double-walled plastic with mechanical line leak detection.

The UST's were monitored by an Automatic Tank Gauge during the operational use period, but now, one of the probes has the sensing wire disconnected, and it is unknown how long it went without inventory control or testing. The site has existing containment sumps on the turbines, and dispensers, as well as sump sensors. This site status is presently shown as "not listed" in the DOE – ISIS LUST Listings.

--  
**The "Discussion of Findings" "Concerns" and "Conclusions" Sections of the NES Phase II ESA Report were shown as follows:**

11.0 Discussion of Findings

Performed Pressure Decay on tank system while sampling – no pressure loss.

11.1.1 On-Site Environmental Concerns

Sample 2AE – 14' Benzene

Sample 3N – 5' Oil present – unknown if above MTCA

12.0 Conclusions

NES has conducted a Phase II ESA of the subject site (901 Martin Luther King Jr. Way Tacoma, WA.). In the professional opinion of Northwest Environmental Solutions, Inc. (NES) has removed samples in accordance to WA. State DOE 173-360. WA. State DOE "ISIS" data base states has two potential areas of concern. Both locations are down gradient from the fill port and Dispenser Island – no ground water was encountered. Benzene on sample 2AE -14' is above MTCA Clean up levels of 0.030 mg/kg.

==



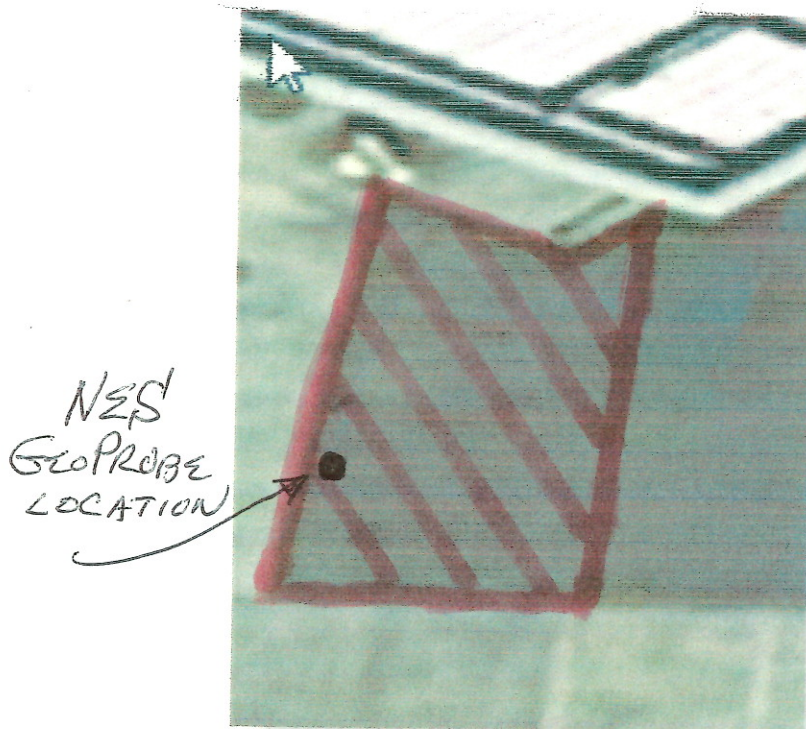
Additional on-site exploratory excavation and soil sampling and testing was required. These on-site procedures necessary to execute this effort included the following steps:

- Request "Locate" of underground utilities;
- Conduct worker safety meeting and discuss work efforts;
- Install required fencing of work area (whole site two entry points);
- Mobilization of necessary equipment (Backhoe w/Breaker);
- Execute "Work Plan", and
- Clean-up and Demob.

The Work Plan for this Phase III – ESA was: 1) Removal of the asphalt and excavation of the soil area adjacent to the East side of the concrete slab that is covering the two known tanks, (Location of NES Sample (2AE); and 2) Excavation near the NE end of the concrete Pump Island, (Location of NES Sample (3N); These actions will be performed to locate and remove any Gasoline, BTEX and/or Heavy Oil contaminated soil.

#### ON-SITE IMPELLATION of THE PLAN

The third UST, which had been "Decommissioned-In-Place" in 1999, had been located to the East side of concrete pad covering those two remaining UST's. The work area of the Benzene "hit" is located on the East side of the concrete pad covering the two existing UST's. That area had been resurfaced with asphalt after Decommissioning. An enlargement of that "third UST" asphalt paved work area is shown within the red cross-hatched area.





The investigation effort PLAN was to first "saw-cut" the boundaries of the two "work areas". Removal of the asphalt covering each of the two "work areas" with the Breaker Bar on the Backhoe and excavation with a Backhoe of the soil. Soil from each excavator bucket load shall be visually examined and "sniffed" by the use of a Photo Ionization Detector (PID) instrument to detect if any petroleum hydrocarbon content exists. "Clean Soil" shall be stockpiled for reuse, and any contaminate soils will be placed on, and covered, with visqueen to await analytical test results. Soil samples will be taken in conformance with required protocols for each of the tests to be requested from the Laboratory. All soil samples collected shall be stored in "iced" conditions until delivered to the Laboratory. Soil samples shall be tested for NWTPH-HCID, Gasoline and BTEX, as appropriate.

The excavation "hole" shall remain open until Laboratory test results from excavated soil test samples are received. After receipt of test results, either further excavation or back-filling will be done. When back-filling is performed, soil compaction will be done at two-foot intervals to prevent future settlement of the excavated area. Care and shoring shall be required during excavation efforts to prevent soil "movement" from beneath the adjacent UST's concrete slab.

--

## **Field Efforts at the Site**

On March 15, the Webster Phase III – ESA commenced.

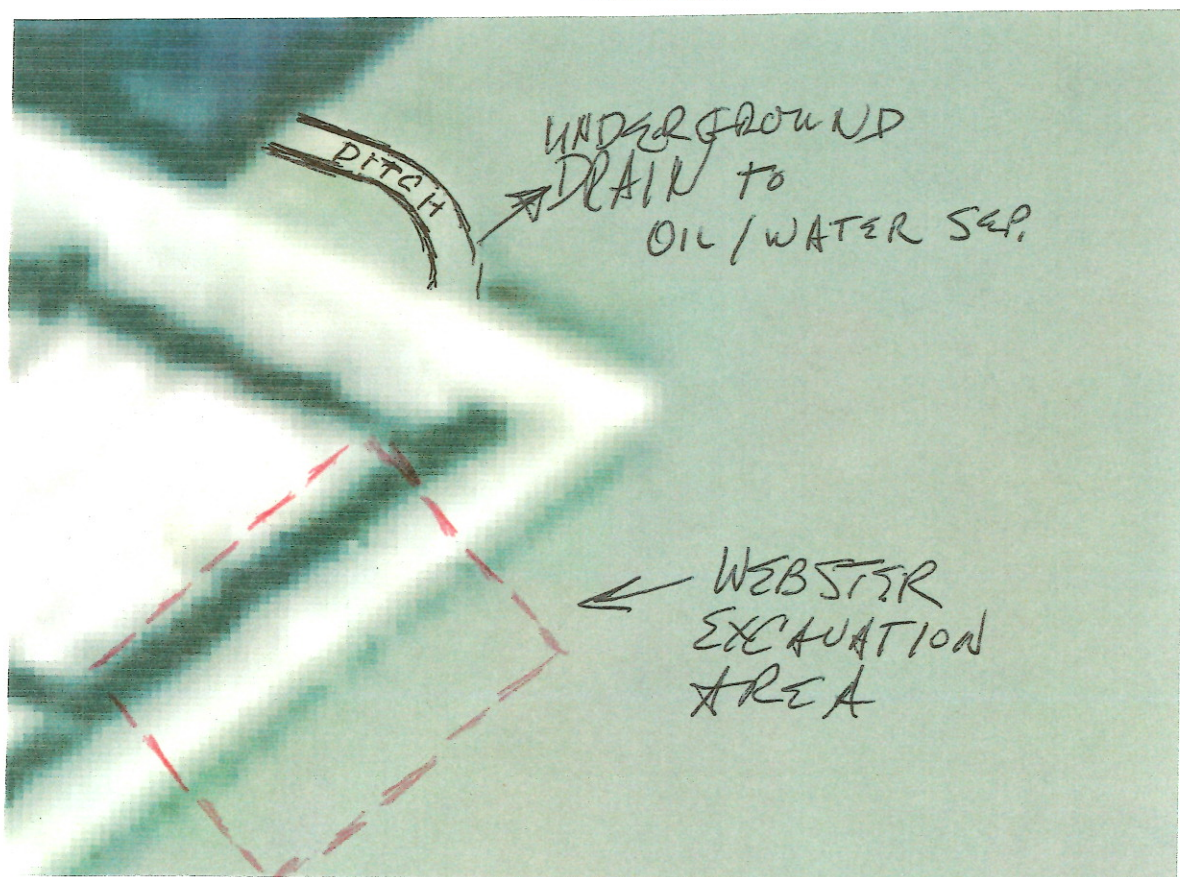
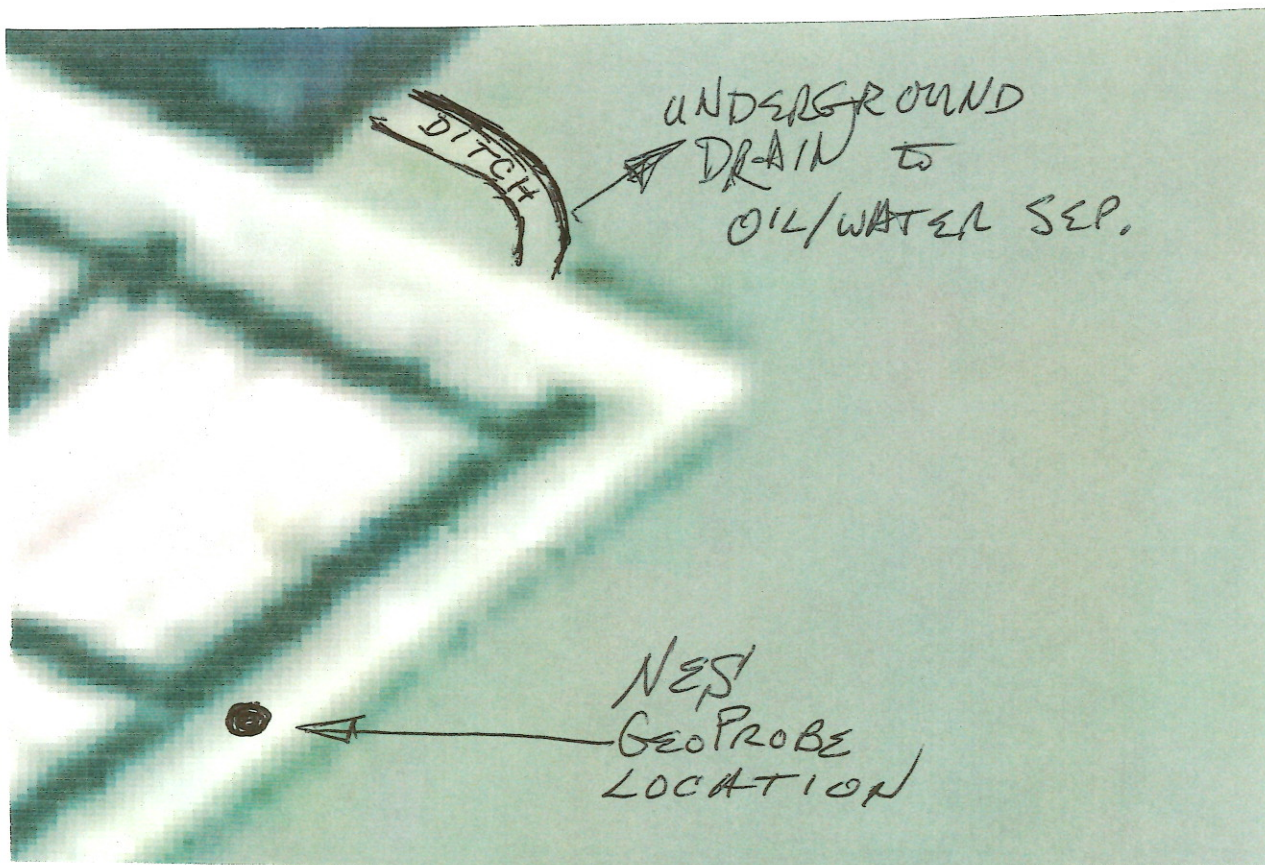
A safety meeting was held to discuss all necessary issues, and the plan for need of emergency assistance if needed. Fencing was installed at the site entry areas to preclude the public from driving into the site until this Phase III ESA was completed.

The first area of investigation was the location of NES Sample (3N), (which tested as "Present" on HCID-Oil), as it was considered to be the easiest.

Webster ask Mr. Wilkerson why he had chosen the sampling area for making the GeoProbe boring that produced Sample (5 ft 3N) in the January NES Phase II study. Mr. Wilkerson advised that when he inspected the site he observed that the Pump Island was surrounded by a small concrete "ditch" which had been covered with slotted metal covers. That ditch gathered any off-flow from the Pump Island concrete pad and sent it to the Oil/Water Separator, through an underground pipe exiting from the NE corner of the ditch. All the metal covers atop the ditch had been removed and "scrapped" by others. The ditch contained various amounts of leaves and debris, and one segment of the ditch concrete was smashed so that runoff was infiltrating into the soil, rather than reaching the outlet pipe that discharged into the Oil/Water Separator. That is why that area had been chosen by NES for the (3N) boring.

On the following page are aerial photos that depict the location of the NES sample (3N) GeoProbe boring location, and the Webster excavation location shown in RED marked outline.







The same area where NES had made the GeoProbe boring, and took Sample number (3N), was stripped of the asphalt with use of the Backhoe breaker. Layers of soil were carefully excavated with the Backhoe and tested with the PID. A number of changes in soil colorizations were observed at different depths. No PID hydrocarbon responses were obtained in any of the excavations down to about six feet deep, (which was deeper than the NES boring). As the "dig" progressed, one soil Sample (#1) had been taken of the most discolored soil from the Backhoe bucket. That soil Sample had been located at the depth of approximately four feet. This grab sample was sent to the Lab for testing by NWT PH-HCID.

The second work area (at the Decommissioned-in-Place UST) was then investigated.

However, as with the "BEST MADE PLANS", -- upon saw-cutting the perimeter of the asphalt cross-hatched area, (see above photo "cross-hatched area") and the breaking and removal, by the Backhoe, of a small section of the asphalt adjacent to the concrete "UST nest pit" cover, it was seen that instead of soil, the Decommissioned-in-Place UST pit had been back-filled totally with "pea-gravel". The asphalt surfacing over the whole cross-hatched "work area" was then removed as the PLAN was being revised.

Photo-ionizing Detector (PID) testing of the pea-gravel over the whole surface of the uncovered area showed no presence of any petroleum hydrocarbons. Careful digging with the Backhoe to depths of between one and two feet over the whole area, also did not find any response from the PID. The PID instrument was checked at Webster's car gas tank and it was proven that the instrument was indeed operating correctly.

The four to five inch thick "edge" of the concrete slab (UST "nest pit" cover), adjacent to the pea-gravel filled pit, was seen to be discolored with dark colored streaks. Cracks in and along the "edge" of the concrete UST pit cover were tested and PID released a high pitched positive response, but a low reading ! Petroleum hydrocarbons were still present in the concrete !

The pea-gravel areas adjacent to the edge of the concrete UST slab were tested again with the PID at numerous locations and depths. No indications of petroleum hydrocarbons were obtained by the PID at any of those tests. Further hand shoveling exploration within the pea-gravel found an electrical conduit at the three-foot depth crossing the pit on an angle, from the building toward the Pump Island.

### **Sampling in the UST "work area".**

Webster's Samples (#2 and #2A) were taken on the surface (depth of a couple of inches) of the pea-gravel of the opened pit, nearest to the location of where the NES GeoProbe Probe had been made. Also Samples were taken of the pea-gravel at the one foot depth (#3), the two foot depth (#4), and the three foot depth (#5), in that same area as the crew was carefully excavating in the Pea-gravel.



Exploration at depths within the pea-gravel in the location where the NES boring had been made provided no PID "hits". In fact, no PID hits were found in any of the areas within the pea-gravel.

As the exploration in the pea-gravel was being done, grab samples of the pea-gravel were also placed in "Plastic bags" and allowed to warm in the sunshine. When later testing of the bags with the PID, no petroleum hydrocarbons response was found.

No evidence of any residual petroleum hydrocarbons was found with the PID in any of the pea-gravel excavation tests; however, it was still decided to leave the pea-gravel surface open to the weather to allow "venting" for a period of time.


The NES had made the "East of the UST's" GeoProbe boring in the asphalt surface, within six-inches of the crack joining the concrete and the asphalt. NES Sample (2AE) had been taken at the depth of fourteen-feet. (See Boring Location on the Drawing.) It could not be remembered or determined if the sample was of "soil" or "pea-gravel"! George Webster considered that the NES Sample (2AE) was most likely still within the pea-gravel, and may have not been taken deep enough to be within the soil at the bottom of the UST "nest pit" beneath the Decommissioned UST.

Webster determined that to be absolutely sure at contamination did not exist in the soil at the bottom of the pit, that another GeoProbe soil sample should be taken IN THE SOIL at that same Boring location at the depth of between sixteen and twenty feet. It was decided that NES would later return with the GeoProbe drill and perform that additional depth boring to obtain that deeper soil sample.

### **Laboratory Testing of the Soil Samples**

Six soil samples were sent to SPECTRA Laboratories in Tacoma. Analytical tests of NWTPH-HCID and BTEX were requested.

The SPECTRA Lab test report was received on March 24<sup>th</sup>. Sample #1, being the soil sample from the NE corner of the Pump Island pad, adjacent to the damaged drainage ditch, and where the NES sampling had obtained the "Present" test result for "Oil", AGAIN had the same result ! But, the Lab had not followed through with the definitive testing to determine the exact level of Oil in ppm. Webster telephoned the Lab and ask that the level be analyzed to define the ppm. level. The Lab said that they would have the answer in one day.

The Samples numbered (2) and (2A) were collected at the surface level of the pea-gravel adjacent to the concrete slab over UST pit. Sample (2) was tested for NWTPH-HCID, while (2A) was tested for Gasoline and BTEX. Samples numbered (3), (4) and (5), which were taken deeper in the pea-gravel, were also tested for Gasoline and BTEX. None of these five soil samples had any positive test results above the lower testing limit. This SPECTRA Lab test report may be found in Appendix 



On the next day, March 25<sup>th</sup>, SPECTRA Lab sent the test results report of the definitive testing of Sample (#1), which had the "Present" result. The level of Oil was now defined as 242 ppm., which is far less than the 2,000 ppm. MTCA Cleanup Level. That SPECTRA Lab test report may be found in Appendix E. *gms*

Therefore the analytical testing of all samples taken by Webster at the subject site proved that there was not any petroleum hydrocarbon contamination in excess of MTCA Cleanup Standards within the areas sampled.

This left the additional Webster requested special GeoProbe sampling of the soil beneath the Decommissioned-in-Place UST as the remaining question.

On April 6<sup>th</sup>, 2014, NES made a GeoProbe drilling down through the pea-gravel into the soil beneath the Decommissioned-in-Place UST, -- at the same location as previous NES Sample (2A), and Webster Samples (2) and (2a). A soil sample (3A) was taken at the depth of 17 feet and submitted to the SPECTRA Lab for analysis by Gasoline and BTEX.

On April 10<sup>th</sup>, SPECTRA Lab sent the test result report for that GeoProbe soil sample. Those test results were "clean". *RESULTS SHOWN IN APPENDIX F,*

Based on the exploratory soil investigations and these above Lab test results, Webster considers that this Phase II ESA proves that the site is not contaminated. In order to return the site to an operable status, a concrete slab (instead of the asphalt surfacing) was laid over the area covering the Decommissioned-in-Place UST to assure that any possible happening of spilled Gasoline during filling the other two UST's cannot enter the pea-gravel. *SW*

Asphalt resurfacing was made of the compacted soil at the excavation made at the NE corner of the Pump Island, and the owner was reminded to repair the concrete drainage ditch and replace the slotted metal tops.

#### **"Release" Cause Concepts**

In the case of the Benzene -- It is felt that the source of the BTEX found in the NES GeoProbe boring within pea-gravel at the fourteen foot depth, certainly occurred after the third UST had been Decommissioned-in-Place, as the previous Site Assessment in the mid 1990's showed no contamination from releases, existed in that pit. It is most likely that a small Gasoline contamination "error release" occurred during an UST filling, or small spill of Gasoline from the hoses of the supplier, ran down-gradient atop the concrete slab into the crack between the concrete slab and the asphalted area adjacent to the UST pit.

Also, the PID "hit" area on the concrete slab was in-line with the fill-hole of the adjacent UST.

WHY ? -- Because, the tightness testing studies on the adjacent UST and lines showed no release sources, and prior testing found no releases. This "cause" cannot be proven to be the case, but it is the basis of this "Release Concept".



**In the case of the Heavy Oil test result of "Present" -- The results of the Webster excavation and sampling found very low levels of Heavy Oil in the discolored soil (far less than Clean-up levels). Based on the fact that the site is sloped toward the northeast, it is likely that storm runoff would possibly contain motor oil and that could be the source of the NES Sample (3N) and Webster Sample #1, contamination. It is felt that this small amount of contamination came from auto motor oil droppings on the Pump Island concrete slab, from the vehicles obtaining fuel, which was drained into the damaged area of the runoff collection ditch and soaked into the adjacent soil. The solution to this "cause" is to repair the concrete ditch before replacing the slotted metal ditch covers.**

**In addition to this Phase III - ESA being required, because of the NES Report findings, the Owners, who were remodeling the Station to conform to their operational concepts, were required by ECY to provide "Owners Insurance Bonding" coverage, and proof of Tank and equipment "Tightness Testing" before they would be allowed to open the Station.**

**Those "Tightness Testing" reports are included in this report and follow.**



## TIGHTNESS TESTING

**Mr. Steven R. Colby of the firm of SME Solutions, LLC. in Tacoma, performed the required Tightness Testing of the two UST's at the Station. (It is unknown why SME used the site name of "Neighbors Chevron", but the address is correctly stated as 901 MLK Way.)**



### Underground Storage Tank Tightness Testing Checklist

The attached Underground Storage Tank (UST) checklist is required for activity listed above. This checklist certifies that the Tightness Testing activities are performed and conducted in accordance with Chapter 173-560 WAC.

See back of form for instructions.

#### 1. UST SYSTEM LOCATION AND OWNER

UBI Number: \_\_\_\_\_ Site ID Number: \_\_\_\_\_  
(UBI # from Master Business License) (Available from Ecology if tank is Registered)

Site/Business Name: Neighbors Chevron

Site Address: 901 Martin Luther King Way Pierce  
Street County  
Tacoma, WA. 98405  
City State Zip+4 (required)  
Telephone: \_\_\_\_\_

UST Owner/Operator: -Same-

Mailing Address: \_\_\_\_\_  
Street P.O. Box  
City State Zip+4 (required)  
Telephone: \_\_\_\_\_

#### 2. FIRM PERFORMING WORK

Service Company: SME Solutions, LLC

Service Co. Address: 2302 A Street  
Street  
Tacoma, WA. 98402  
City State Zip+4 (required)

Certified Supervisor: Steven R. Colby

Address: 2302 A Street  
Street P.O. Box  
Tacoma, WA. 98402  
City State Zip+4 (required)

ICBO Certification Number: 0875024-U3 Certification Issue Date (Month/Year): 10/2013

Telephone: 253-572-3822

Ecology is an equal opportunity employer.

If you require special accommodations or need this document in an alternate format, please contact the Toxics Cleanup Program at (360) 407-7170. Persons with hearing loss can call T11 for Washington Relay Service. Persons with a speech disability can call (877) 833-6341.

ECY 070-69 (11/08) White Copy (Ecology), Yellow Copy (Owner/Operator), Pink Copy (Service Provider)



# Underground Storage Tank

## Tightness Testing Checklist

Site ID #	
Site Address	
901 Martin Luther King Way	
City Tacoma, WA	

For more than four UST systems, you may photocopy this form prior to completing.

### I. TIGHTNESS TESTING METHOD

Date of Test: 6/2/14

1. Tightness testing method(s) used (indicate if more than one method was used):

Test method name/version Masstech

Test method manufacturer Leighton O'Brien

Note: A tank must be tested up to the product level limited by the overfill prevention device. If an overfill prevention device is not installed, a tank must be tested up to the 95% full level. When underfill volumetric testing methods are used, the tank must be (1) filled with product to the 95% full level or (2) the portion of the tank above the product level must be tested using a nonvolumetric method which meets performance standards for tightness testing.

2. Indicate the method used to determine if groundwater was present above the bottom of the tank during the test (required for single wall tanks): N/A

3. Method used for release detection:

- ☐ Weekly manual gauging  
☐ Daily manual inventory control  
☒ Automatic tank gauging (ATG)  
☐ Interstitial monitoring  
☐ Other (describe)

4. Reason for conducting tightness test:

- ☒ Required for release detection requirement  
☐ Bring temporarily closed tanks back into service  
☐ Tank or piping repair  
☐ Other (describe)

5. Type of test conducted:

- ☒ Tank tightness test only  
☐ Line tightness test only  
☐ Total system test (tank and lines tested together)  
☐ Line leak detector test

6. Test method type:

- ☐ Overfill volumetric  
☐ Underfill volumetric  
☒ Nonvolumetric  
☐ Volumetric

### II. TEST METHOD CHECKLIST

The following items shall be initiated by the Certified Supervisor whose signature appears on this form.

1. Has the tightness testing method used been demonstrated to meet the performance standard specified in the UST rules for the conditions under which the test was conducted? (e.g., detecting a 0.10 gallon per hour leak rate with probability of detection of at least 95% and a probability of false alarm of no more than 5%).

Yes No NA\*  
SRC

2. Have all written testing procedures developed by the manufacturer of the testing equipment and method been followed while the test was being set up and conducted?

SRC

3. Was the product level in the tank during the test within the limitations of the test methods performance standards?

SRC

4. If groundwater was present above the bottom of the tank, have the testing procedures accounted for its presence? (required for single wall tanks)

SRC

5. If the tightness test is considered a failed test, has the owner/operator been notified of the test results? (Note: Tank owner must report a failed tightness test as a suspected release within 24 hours to UST staff at the appropriate Ecology regional office.)

SRC

\* Item not applicable

White Copy (Ecology), Yellow Copy (Owner/Operator), Pink Copy (Service Provider)

ECY 070-02 (11/08)



Site ID #	
Site Address	901 Martin Luther King Way
City	Tacoma, WA

### Tightness Testing Checklist (continued)

#### III. TANK INFORMATION CHECKLIST

	Tank 1	Tank 2	Tank 3	Tank 4
1. Tank ID # (tank name registered with Ecology)				
2. Date installed				
3. Tank capacity in gallons	12000	12000		
4. Last substance stored	Regular	Super		
5. Number of tank compartments	1	1		
6. Tank type: (S) single wall; (D) double wall; (P) partitioned	Single Wall	Single Wall	✓	✓
7. Is overfill device present? (Yes/No)	Ball Float ✓	Ball Float ✓	✓	✓
8. Percentage of product in tank during test? (Volume % must comply with test method certification requirements)	0%	0%		
9. The test method used can detect a leak of how many GPH?	.1 gph	.1 gph		
10. The numerical tank test results are? (in gallons per hour)	N/A	N/A		
11. Based on evaluating test results and conducting any retesting as necessary as per test protocol to obtain conclusive test results, the test results are? (Pass/Fail)*	PASS ✓	PASS ✓	✓	✓

#### IV. Line Information


	Line 1	Line 2	Line 3	Line 4
1. Piping type: (S) single wall; (D) double wall	Double Wall ✓	Double Wall ✓	✓	✓
2. Pump type: (T) turbine; (S) suction	Turbine ✓	Turbine ✓	✓	✓
3. (a) If turbine, is line leak detector present? (Yes/No)	YES ✓	YES ✓	✓	✓
(1) If present, was lead seal intact? (Yes/No N/A)	N/A ✓	N/A ✓	✓	✓
(2) Line leak detector results? (Pass/Fail)	N/A ✓	N/A ✓	✓	✓
(b) If suction, check valve located at? (T) tank (P) pump	N/A ✓	N/A ✓	✓	✓
4. The numerical line test results are? (in gallons per hour)	N/A	N/A		
5. Line tightness test results? (Pass/Fail)*	N/A ✓	N/A ✓	✓	✓

\* Inconclusive test results for tanks or piping will not be considered as a valid tightness test for the purposes of complying with UST release detection regulations.

#### V. REQUIRED SIGNATURES

I hereby attest, that I have been the Certified Supervisor present during the above listed testing activities, and to the best of my knowledge they have been conducted in compliance with all applicable state and federal laws, regulations and procedures, pertaining to underground storage tanks.

Persons submitting false information are subject to criminal enforcement and/or penalties under Chapter 173.360 WAC.

6/2/14		Digitally signed by Steven R. Colby	Digitally signed by Steven R. Colby
Date	Signature of Certified Supervisor	Printed Name	
Date	Signature of Tank Owner/Authorized Representative	Printed Name	



## Checklist Instructions

After completing these checklist(s), return to: Underground Storage Tank Section  
Department of Ecology  
P.O. Box 47655  
Olympia, WA 98504-7655

### Please Read Carefully

Checklist(s) are to be completed by a Certified UST Supervisor and submitted to Ecology within 30 days of the tank work being performed.

On each checklist, complete the Site ID number and/or the UBI number, site address and site city on each page. Submit the cover sheet that contains the site and owner information with the checklist. The checklist should show all tank information that was worked on. Be sure that the Owner or the Authorized Representative AND Certified Supervisor sign the appropriate checklist.

The Owner/Operator is responsible for ensuring that the work is performed and that the checklist(s) are submitted to Ecology.

### Cover Sheet

#### Site and Owner Information

Fill in the site and owner information. Include the Ecology Site ID number, if known, and/or UBI number (Uniform Business Identification) from the master business license. Also be sure to provide telephone numbers so that any problems can be resolved quickly.

#### Firm and Certified Supervisor Information

List the firm performing the work as well as the Certified Supervisor's name and Certification Number. Ask to see the Supervisor's Tightness Testing ICBO Certification and make sure that the Supervisor signs the appropriate checklist for work performed.

Please Note: Individuals performing services MUST be certified by the International Code of Building Officials (ICBO), or other recognized association by which they demonstrate appropriate knowledge pertaining to USTs or have passed another qualifying exam approved by the Department.

### Checklists

The Tightness Testing Checklist shall be completed and signed by a Certified Tightness Testing Supervisor. The supervisor shall be on site during all tank tightness testing activities. Up to four tanks per site may be reported on a single checklist; additional tanks will require additional checklists. A Tightness Testing Checklist must be completed for each UST system (tank and associated piping) being tested as well as following most retrofit/repairs.

The tank owner or operator must report a failed tightness test as a suspected release to UST staff at the appropriate Ecology regional office within 24 hours.

Northwest  
(425) 649-7000

Southwest  
(360) 407-6300

Central  
(509) 574-2490

Eastern  
(509) 329-3400

White Copy (Ecology), Yellow Copy (Owner/Operator), Pink Copy (Service Provider)

**This Tightness Testing effort proved that the two UST's, both Turbines, and all the double-walled piping were "tight".**

Based on this Phase III – Environmental Site Assessment study and the Tightness Testing Report (included), I, George R. Webster, P.E. certify that in my opinion that the site known as the "Main Street Grocery", which was also formerly operated as a Shell Gasoline Station, is free of environmental contamination in excess of the MTCA Cleanup Levels.

Sincerely;



George Webster, P.E.



6-18-14



