

Environmental Scientists, Planners and Consultants

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August 5, 2014

Mr. Chris DeWald Proctor Investors, LLC 6622 Wollochet Drive NW Gig Harbor, Washington 98335

Re: Remediation of arsenic-contaminated soil at the North 28th Street and North Proctor Street site in Tacoma.

Dear Chris:

The purpose of this report is to document the remediation of arsenic-contaminated soil at the North 28th Street and North Proctor Street site in Tacoma, Washington.

SITE BACKGROUND

From our report dated February 20, 2014 titled "Shallow soil sampling at the North Proctor Street site in Tacoma", shallow soil samples were collected from the following residential parcels of land (Figure 1):

- 3920 North 28th Street.
- Vacant lot between 3920 and 3916 North 28th Street.
- 3916 North 28th Street.
- 3912 North 28th Street.
- Grass strip along the side and the front of the subject parcels, along North Madison Street to the west and North 28th Street to the north.

The purpose of this sampling was to determine whether the shallow onsite soil had been adversely impacted by air emissions from the former Asarco smelter in Tacoma. These subject parcels are located in a "Level 1" area where arsenic concentrations in the soil likely exceed the Washington State Department of Ecology (Ecology) cleanup standard of 20 parts-per-million (ppm). Lead contamination above the Ecology cleanup standard of 250 ppm may also be present.







Not to scale

From the report, soil samples were collected from unpaved, non-garden areas of each of the parcels, at depths of approximately 0 - 6 inches and 6 - 12 inches below grade. Each sample was a composite of soil from several random locations. From these samples, arsenic was detected at 0 - 6 inches below grade at 3916 North 28th Street at a concentration that is above Ecology's cleanup standard (see Figure 1). Other samples collected from the site, both at 0 - 6 inches and 6 - 12 inches below grade, contained arsenic and lead at concentrations that are below Ecology's cleanup criteria.

Based on these results, the report recommended that soil from 0 - 6 inches below grade throughout the entire unpaved, non-garden areas of this 3916 North 28^{th} Street parcel be properly excavated and disposed of.

SITE REMEDIATION

On Thursday, July 10, 2014, shallow soil was excavated from the unpaved areas at 3916 North 28th Street (Figure 2). Shallow soil was also excavated from the vacant lot next door (see Figures 1 and 2).

Overall, a total of 120.99 tons of arsenic-contaminated soil was disposed of at the LRI Landfill in Graham, Washington. This disposal was conducted under Waste Disposal Authorization number 1788 issued by the Tacoma-Pierce County Health Department. Soil disposal receipts are attached as Appendix A.

Given the approximate square footage of the excavation area and the tonnage of soil disposed of, soil excavation occurred to an actual average depth of approximately 8 inches below grade across the site.

CONCLUSIONS AND RECOMMENDATIONS

Shallow arsenic-contaminated soil was excavated from 3916 North 28th Street and the adjacent vacant lot to an average depth of approximately 8 inches below grade. This soil was disposed of at the LRI Landfill in Graham under permit issued by the Tacoma-Pierce County Health Department.

There were no soil samples collected from the over-excavation area to verify the effectiveness of the remediation work. Previous sampling at the site did not indicate the presence of arsenic or lead at concentrations above the Ecology cleanup standards at depths below 6 inches below grade.

Overall and based on the work performed and previous soil sampling results, no further environmental investigation of this subject area appears warranted.





Figure 2. Approximate soil excavation area. 3916 North 28th Street, Tacoma. July 10, 2014.





Not to scale

Please call me if you have any questions.

Sincerely,

ECO COMPLIANCE CORPORATION

Bill Kane

Bill Kane President **bill@ecocompliance.biz**

Attachment



APPENDIX A

SOIL DISPOSAL RECEIPTS



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