STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

CERTIFIED MAIL
7006 3450 0001 6754 0352

April 22, 2008

Mr. Bruce Bodine
Bodine Enterprises
2112 109th St. S
Tacoma, WA 98444

Re: Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site:

- Name: Sprague Street Shell
- Address: 1401 South Sprague Avenue, Tacoma
- Facility/Site No.: 53486312
- VCP No.: SW0871

Dear Mr. Bodine:

Thank you for submitting your independent remedial investigation reports for the Sprague Street Shell facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Phase 1/Limited Phase II Environmental Site Assessment Automall Property, 1401 Sprague Avenue South, Tacoma, Washington, dated March 19, 2007 by Adapt Engineering Inc.

2. Subsurface Investigation Activities – 1401 S. Sprague Underground Storage Tank Release, dated June 7, 2007 by Robinson Noble Saltbush Inc.

3. Product Line Replacement – Interim Site Remediation – Sprague Shell, 1401 South Sprague Avenue, dated December 11, 2007 by Associated Environmental Group, LLC.

4. Site files and VCP Application.

The documents listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact at 360-407-6365.

The Site is described in Enclosure A to this letter, which includes a Site diagram. The description of the Site is based solely on the information contained in the document listed above.

The Site is defined by the extent of contamination caused by the following release(s):

- Petroleum hydrocarbons and related constituents in soil and groundwater.
- Possible arsenic in shallow soil.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site are not sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing any of the contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5),

Ecology is issuing this opinion that **further remedial action is necessary** at the Site under MTCA.

1. Adapt Engineering's (Adapt) investigation identified contamination at both the northwest and southwest corners of the site. The character of the groundwater contamination found at the northwest corner is consistent with contamination found during the investigation of the former Pierce County bus maintenance yard, which includes gasoline-range total petroleum hydrocarbons (TPH-G), diesel-range total petroleum hydrocarbons (TPH-D) and oil-range total petroleum hydrocarbons (TPH-O). Further characterization of the TPH-G, TPH-D, and TPH-O exceedances [GP-1 (3,100 micrograms per liter (ug/L) TPH-G, 29,000 ug/L TPH-D, and 63,000 ug/L TPH-O)] noted in the groundwater in the northwest corner of the property should be conducted. While no exceedances of the MTCA Method A clean up levels were found in the soil from soil boring GP-1, the levels noted in the groundwater would suggest a soil source in the vicinity of this boring. In addition, at least three permanent groundwater monitoring wells should be installed in this area to monitor fluctuations in both contaminant concentrations and track depth to groundwater measurements to allow for proper determinations of groundwater flow directions. Based on the data collected, the installation of additional wells may be needed to fully define the extent of contamination in groundwater.

2. The Adapt, Robinson Noble Saltbush, Inc. (RNS), and Associated Environmental Group, LLC (AEG) investigations identified TPH-G and benzene exceedances in both soil and groundwater at the southwest portion of the property (Shell service station). This contamination is consistent with a gasoline leak that was identified in a subsequent helium line tightness test. A product transfer line near the fueling islands was found to be leaking gasoline into the subsurface. AEG supervised a product line replacement and an interim soil remediation activity. Based on the results of the investigation, the impacted soil has been removed from underneath the leaking line except where limited by the potential to undermine structures (near confirmation sample EX-8). Soil samples collected by RNS and AEG indicate that the extent of impacted soils has not been fully delineated. In addition, groundwater monitoring data from RNS indicates that the extent of groundwater contamination has not been fully delineated to the south, east, west, and northwest of the fueling islands and UST tank nest. It is recommended that a supplemental investigation be conducted to investigate the extent of impacted soils and groundwater in the areas mentioned above. It

is also recommended that depth to groundwater measurements be collected from all wells to determine the direction of shallow groundwater flow in this portion of the site.

3. This property is located within the area that is known to have lead and arsenic contamination in soil due the air emissions originating from the old Asarco smelter in north Tacoma. Under MTCA, a site evaluation and cleanup must consider and address all contaminants likely to be present at a site to receive a full "No Further Action" determination. Therefore, if you eventually wish to obtain a "No Further Action" determination for this site, it is necessary to test for arsenic in site soils.

4. Ecology recommends that a Work Plan for further characterization of the site as noted above be submitted for review and approval to ensure that the proposed activities are likely to meet the substantive requirements of MTCA.

5. In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Independent Remedial Actions shall be submitted in both a written and electronic format. For additional information regarding electronic format requirements, see the website http://www.ecy.wa.gov/eim. Please ensure that data generated during on site activities is submitted pursuant to this policy. **Data must be submitted to Ecology in this format for Ecology to issue a No Further Action (NFA) determination.**

This letter replaces the Ecology NFA determination of November 4, 2002. Ecology's NFA determination of November 4, 2002 issued to this site is hereby rescinded while you conduct the necessary additional and final cleanup at this site to address the MTCA substantive requirements for the petroleum hydrocarbons.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or performed at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 360-407-7263.

Sincerely,

Thomas Middleton L.HG.
SWRO Toxics Cleanup Program

TMM/ksc:Sprague Shell Tacoma Further Action

Enclosures: Site Summary
Figure 3 – Adapt Engineering Site and Vicinity Plan
Table 1 – Adapt Engineering Summary of Analytical Results: Soil
Table 2 – Adapt Engineering Summary of Analytical Results: Groundwater
Figure 3 – Robinson Noble Potentiometic Surface Contour Map
Figure 4 – Robinson Noble Groundwater Concentrations above MTCA Method A Map
Figure 5 – Robinson Noble Soil Concentrations Exceeding MTCA Method A Map
Figure 2 – AEG Product Line Excavation Plan
Table 1 – AEG Summary of Soil Analytical Results – Product Line Investigation

Cc: Mr. John Hildenbrand Robinson, Noble, & Saltbush
Rob Olsen Pierce Co Health Dept
Carol Johnston – Ecology
Lisa Shriver - Ecology
Scott Rose – Ecology

Enclosure A

Site Summary

The site is located at 1401 S. Sprague Ave. in Tacoma, Pierce County, Washington. The site is a nearly rectangular-shaped parcel of land, comprising 3.56 acres. The property owners of the parcel are Bruce & Debra Bodine. The site was previously occupied by the former Pierce Transit Maintenance and Operations Facility from approximately 1948 until 1987. According to archive documents, this facility was comprised of underground storage tanks (USTs), a fueling station, two oil-water separators, six service pits, hydraulic hoists, and chemical storage areas. The site was redeveloped into the current self-storage facility in 1995. In addition, the southwest corner of the site was developed as a Shell gas station and convenience store with four pump islands and three USTs. Mr. Pradep Kushan has leased a tenant space (the Sprague Shell Tacoma) in the southwest area of the site from the Bodines since 2006. The gas station consists of three 8,000-gallon USTs and associated product lines. The gasoline containing USTs are double wall steel clad with corrosion resistance protection. The existing product lines (prior to replacement) were double wall fiberglass lines.

The site is located within the Puget Sound basin in western Washington. The Puget Sound basin is a north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. The topography is dominated by north-south trending valleys and low, nearly flat-topped highlands cut by streams. The topographic surface of Pierce County is largely the result of erosion and deposition during and since the last glaciations (during the last 15,000 years). The site and vicinity area is underlain by Quaternary age glacial till deposits that typically consist of unsorted, unstratified, highly compacted mixture of clay, silt, sand, gravel, and boulders deposited directly by glacial ice, locally contain outwash sand and gravel both within and overlying till. According to Associated Environmental Groups, LLC (AEG's) subsurface investigation during the product line replacement, the subsurface conditions at the site consist of fill underlain by outwash sediments and glacial till deposits. Fill, observed to approximately 6 feet below ground surface (bgs), consisted of medium dense silty sand with wood debris. The outwash deposits consisted of silty sand, from approximately 6 to 10 feet bgs in areas, to predominantly silt and clay, from approximately 10 to 14 feet bgs. These deposits were underlain by weathered glacial till that consisted of medium dense to dense gray clayey sand with gravel to the maximum depth explored, at 15.5 feet bgs. Groundwater under the site appears to be seasonal and varies both in depth and flow direction. Recent investigations (March and June 2007) noted that groundwater has been present ranging from 3 to 10 feet

bgs. During the recent product line replacement, groundwater was not encountered in significant quantities and minor seepage was noted at approximately 10 feet bgs.

Applied Technology, Inc. (AGI) conducted a subsurface investigation and subsequent remediation in April 1991 associated with a waste oil line leak and other contaminated areas at the site associated with the maintenance building. According to AGI's report, approximately 3,700 cubic yards of petroleum contaminated soil (PCS) was excavated and disposed of during the remediation activities. Additionally, an estimated 45,000 gallons of oily water was pumped from on-site excavations. The original building walls and foundation were left in place and PCS remains at the site beneath the footings of the maintenance building along the north wall and beneath portions of the west and east walls at the northwest and northeast corners of the maintenance building.

The site was redeveloped into the current self-storage facility in 1995. In addition, the southwest corner of the site was developed with a Shell gas station and convenience store with four pump islands and three USTs. In the process of installing a sign on the northwest corner of the site, petroleum-impacted soil and groundwater was encountered in the approximate area of one of the previous Pierce Transit Facility oil/water separators. AGI conducted a subsurface investigation and subsequent remediation associated with petroleum-impacted soil and groundwater. Based on a review of AGI's Site Remediation activities in 1991 and Saltbush's letter to Ecology in October 2002, Ecology granted the Parcel a *No Further Action* status with a restrictive covenant for the residual contaminated soils that remained in place beneath the maintenance building.

ADAPT Engineering conducted a Phase I Environmental Site Assessment (ESA)/Limited Phase II ESA at the site in March 2007 at the request of a potential buyer. Six geoprobe borings were advanced to depth of up to 12 feet bgs from which soil and groundwater samples were collected. The selected soil samples did not indicate detectable levels of concentrations of gasoline through motor oil range total petroleum hydrocarbons (TPH). However, a soil sample from GP-4, drilled adjacent to the pump islands indicated a benzene level of 0.42 milligrams per kilogram (mg/Kg), which exceeded the MTCA Method A soil cleanup level of 0.03 mg/Kg. Shallow groundwater was encountered in each of the borings at depths ranging from approximately 3 1/2 feet to 7 feet bgs. Groundwater analytical results from a geoprobe boring located in the northwest corner of the site indicated elevated concentrations of gasoline, diesel, and heavy oil range TPHs (at 3,100 micrograms per liter [ug/L], 29,000 ug/L, and 63,000 ug/L, respectively). These concentrations are above Ecology MTCA Method A groundwater cleanup levels for these

constituents at 800 ug/L, 500 ug/L, and 500 ug/L, respectively. This boring was near the former oil/water separator and sign excavation mentioned previously. Additionally, elevated concentrations of gasoline range TPHs and benzene (at 890 ug/L and 530 ug/L, respectively) were also reported at a geoprobe boring located west of the USTs concrete pad. These concentrations are also above MTCA Method A groundwater cleanup levels (ADAPT Engineering, 2007).

SME Corporation conducted an annual UST Tightness Testing at the subject site on April 18, 2007. SME reported that the UST system and lines passed the test. Ecology conducted a UST Site Inspection on April 30, 2007. Ecology issued a Notice of Non-Compliance for failure to monitor and submit release detection reports for the USTs to Ecology.

Robinson Noble Saltbush, Inc. (RNS) conducted subsurface investigation activities at the site in April and May 2007 at the request of the parcel owners, Bruce & Debra Bodine. A total of 19 borings were advanced and five monitoring wells were installed in the vicinity of the subject site's pump islands and USTs concrete pad. Analytical results of selected soil samples collected from the vicinity of the dispenser islands and UST tank pad indicated elevated concentrations of gasoline range TPHs (at 108 mg/Kg) and benzene (ranging from 0.59 mg/Kg to 1.93 mg/Kg). These concentrations are above Ecology MTCA Method A soil cleanup levels of 30 mg/Kg and 0.03 mg/Kg, respectively. These samples were collected from depths of 8.5 feet bgs to 14 feet bgs (RNS, 2007). Analytical results of selected groundwater samples from monitoring wells installed at the site by RNS in the vicinity of the dispenser islands and UST tank pad indicated elevated concentrations of gasoline-range TPHs (at 820 ug/L to 9,100 ug/L) and benzene (ranging from 8.9 ug/L to 3,520 ug/L). These concentrations are above Ecology MTCA Method A groundwater cleanup levels of 800 ug/L and 5 ug/L, respectively. RNS concluded that the contaminants identified are the result of a relatively current release associated with the current system. There is no evidence to indicate that the contaminants are related to any historical uses on the site.

AEG conducted a Phase I ESA at the Site in June 2007. AEG identified the following recognized environmental conditions (RECs), as defined by ASTM, in connection with the site based on historical and current practices at the site.

• The Tacoma Self-Storage building, located adjacent to the north of the subject site, was
historically occupied by the former Pierce Transit Maintenance and Operations Facility

from approximately 1948 until 1987. According to archive documents reviewed, this facility was comprised of USTs, a fueling station, two oil-water separators, six service pits, hydraulic hoists, and chemical storage areas.

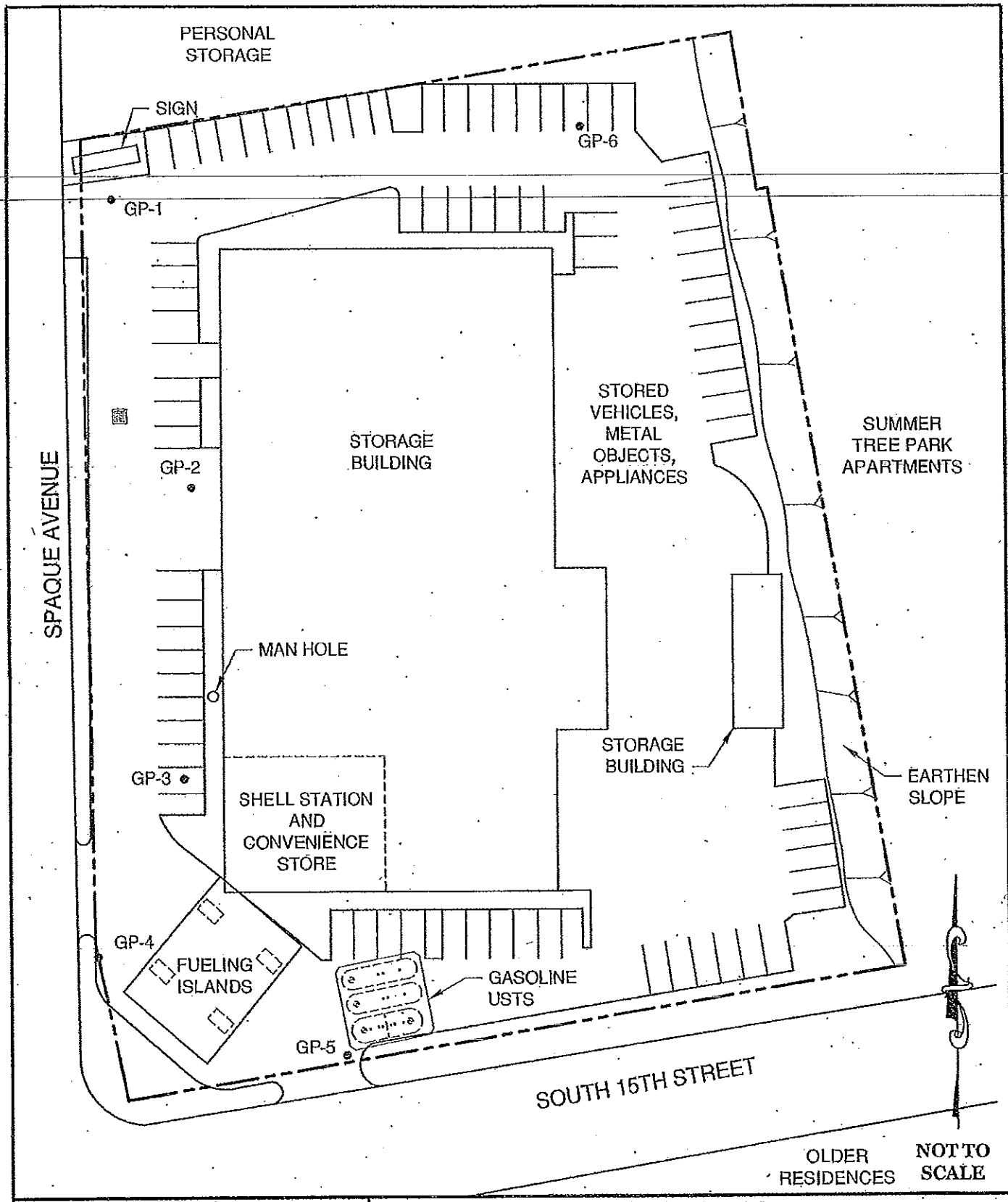
• Analytical results of groundwater samples collected in March 2007 from a monitoring
well located near the northwest corner of the parcel, in the vicinity of historical USTs and an oil-water separator, indicated elevated concentrations of gasoline, diesel, and heavy oil range TPH (at 3,100 ug/L, 29,000 ug/L, and 63,000
ug/L, respectively). These concentrations are above Ecology MTCA Method A groundwater cleanup levels for these constituents at 800 ug/L, 500 ug/L, and 500 ug/L,
respectively.

AEG supervised a helium test at the site on June 26, 2007. Northwest Tank & Environmental Services, Inc. (Northwest Tank) conducted the helium test on the UST system and product lines. Northwest Tank segregated each product line for separate helium testing. The test indicated that the regular unleaded gasoline product line failed. Subsequently, this product line and its associated 8,000-gallon UST containing regular unleaded gasoline ceased operation from June 26, 2007 to October 16, 2007 (the start of the product line replacement work at the site).

A backhoe and an excavator were utilized to excavate and trench beneath the product lines. Trenching along the product lines included areas adjacent to all four dispenser islands and further to the east-southeast, toward the USTs. Upon observing indications of PCS beyond areas below the product lines, AEG directed complete excavation of soil in between the dispenser islands. Soil excavation and associated soil sampling beneath the product lines, ranged from directly below the product lines, at 2 1/2 feet bgs, to approximately 15.5 feet bgs, at selected areas below the product lines and excavation area. AEG also observed the presence of a weathered dark brown silt band, at approximately 7 feet bgs, throughout the excavation area that was impacted by petroleum hydrocarbons. Excavation below the product lines in areas east of the dispenser islands towards the USTs ranged from 8 1/2 feet to 9 1/2 feet bgs. Indications of PCS were observed predominantly beneath the product lines and in between the dispenser islands. Excavated areas east of the dispenser islands, towards the USTs, were the only areas that were not impacted by petroleum hydrocarbons as verified by soil analytical results. AEG did not observe holes or obvious cracks in the product lines. Groundwater seepage was observed at approximately 9 feet to 10 feet bgs. AEG collected soil samples throughout the excavation, from 2 1/2 feet to 15 1/2 feet bgs, at selected locales. These samples were

submitted for on-site mobile laboratory analysis of gasoline range TPHs in accordance with Ecology MTCA Table 830-1. Confirmation soil samples were collected throughout the excavation pit from approximately 8 feet bgs to 15.5 feet bgs. Confirmation soil samples indicated that all PCS was removed with the exception of the area near soil sample EX8, located adjacent to the westernmost dispenser island. Due to the structural presence of a 9-inch diameter steel storm water drain pipe (present at approximately 2 1/2 feet bgs and trending diagonally across the fuel pad from northwest to southeast) and the adjoining westernmost dispenser islands, Northwest Environmental Solutions (NES) was unable to excavate beyond 15.5 feet bgs in this area. In addition, the structural integrity of the dispenser island and storm water drain pipe would have been jeopardized with further excavation activities in this area.

Approximately 404 tons of PCS was excavated and removed from beneath the product
lines/excavated areas and stockpiled on site on top of visqueen for disposal. Subsequently, the PCS was disposed of at a regulated landfill, Pierce County LRI landfill in Graham, Washington. Minor groundwater seepage was encountered only at two areas throughout the excavation pit. Groundwater did not accumulate; therefore, seepage of groundwater did not pose problems during site excavation and compaction activities.



Adapt Engineering, Inc.
615 - 8th Avenue South
Seattle, Washington 98104

Tel (206) 654-7045
Fax (206) 654-7048

FIGURE 3 - Site and Vicinity Plan

Project : Automall Property
Location : 1401 Spraque Avenue South
Tacoma, WA 98405
Client : Bob Boggess
Project No : WA07-14518-PH1 Date : 03/13/07

- The southwest portion of the site was developed in 1995 with a Shell mini-service and convenience store with two fueling islands and three gasoline USTs.

- The site was subsequently submitted to Ecology for review under its Voluntary Cleanup Plan in 2002 by Saltbush Environmental. Based upon its review, Ecology subsequently granted the site "No Further Action" (NFA) status, with a restrictive covenant for the residual contaminated soils that remain in place at the site.

- Adapt's current limited subsurface environmental assessment included advancing six (6) geoprobe borings to depths of up to 12 feet below ground surface (bgs), and analytical testing of recovered soil and groundwater sample. Boring locations are depicted on the attached Site and Vicinity Plan, Figure 3. Selected soil samples screened from borings did not exhibit detectable concentrations of gasoline through motor oil-range TPH. However, a soil sample collected from boring GP-4 (GP-4/9-10), drilled adjacent to the Shell station pump islands, exhibited a benzene concentration of 0.42 parts per million (ppm), which is in excess of the MTCA Method A cleanup level of 0.03 ppm (See Table 1 below).

Table 1 : Summary of Analytical Results: Soil

Sample ID	Sample Depth (ft)	TPH-G (ppb)	TPH-D (ppb)	TPH-HO (ppb)	TPH-MO (ppb)	B (ppb)	T (ppb)	E (ppb)	X (ppb)
GP-1/11-12	11 to 12	<20	<50	<100	<100	NT	NT	NT	NT
GP-2/9-10	9 to 10	<20	<50	<100	<100	NT	NT	NT	NT
GP-3/9-10	9 to 10	<20	<50	<100	<100	NT	NT	NT	NT
GP-4/9-10	9 to 10	<10	NT	NT	NT	0.42	<0.05	<0.05	<0.05
GP-5/11-12	11 to 12	<10	NT	NT	NT	<0.02	<0.05	<0.05	<0.05
GP-6/6-7	6 to 7	<20	<50	<100	<100	NT	NT	NT	NT
MTCA		30/100	2,000	2,000	4,000	0.03	7	6	9

ppm = All concentrations reported in parts per million (ppm)
TPH = Total Petroleum Hydrocarbons – gasoline, diesel and heavy oil and Mineral oil-range TPH by Ecology Methods NWTPH-G and NWTPH-Dx
BTEX = Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020
MTCA = Model Toxics Control Act (Method A Cleanup levels shown)

- Shallow groundwater was encountered in all of the borings at depths ranging from approximately 3½ to 7 feet bgs. The groundwater sample collected from boring GP-1, located near the sign on the northwest portion of the site and former Pierce Transit oil/water separator, exhibited elevated concentrations of gasoline, diesel, and motor oil-range TPH that were in excess of the respective MTCA Method A cleanup levels. Groundwater samples collected from Borings GP-4 and GP-5, drilled adjacent to the service islands and petroleum USTs associated with the onsite Shell station, exhibited elevated concentrations of benzene that were in excess of the MTCA cleanup level. Also, sample GP-5/W-1 exhibited an elevated concentration of gasoline-range TPH that is in excess of the MTCA Method A cleanup level for groundwater with detectable benzene. Groundwater samples collected from other on-site borings, drilled to the west

of the Automall building (GP-2 and GP-3), and the former Pierce Transit fueling facility located near the northeast corner of the site (GP-6), did not exhibit detectable concentrations of gasoline through mineral oil-range TPH, and non-detectable to low level concentrations of volatile organic compounds (VOCs) that are below MTCA cleanup levels. Groundwater analytical test results are summarized below:

Table 2 : Summary of Analytical Results: Groundwater

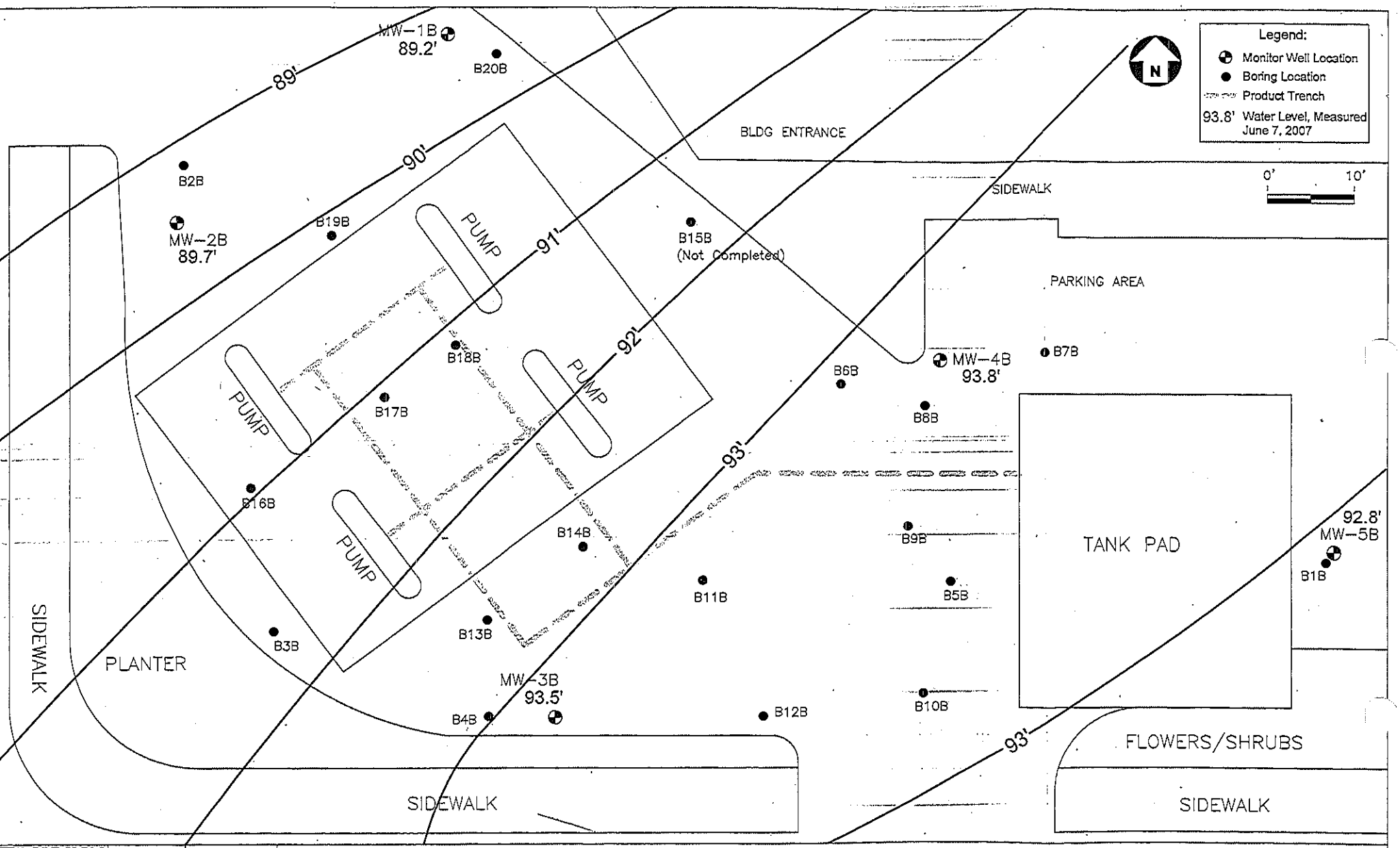
Sample ID	TPH-G (ppb)	TPH-D (ppb)	TPH-O (ppb)	B (ppb)	T (ppb)	E (ppb)	X (ppb)	Other VOCs (ppb)
GP-1/W-1	3,100	29,000	63,000	1.1	5.6	1.1	4.4	* See below
GP-2/W-1	<250	<400	<400	<1.0	<1.0	<1.0	<1.0	ND
GP-3/W-1	<250	<400	<400	<1.0	<1.0	<1.0	<1.0	ND
GP-4/W-1	670	NT	NT	330	16	24	82	NT
GP-5/W-1	890	NT	NT	530	50	<1.0	22	NT
GP-6/W-1	<100	<200	<400	<1.0	1.1	<1.0	2.6	ND
MTCA	800/1,000	500	500	5	1,000	700	1,000	varies

ppm = All concentrations reported in parts per billion (ppb)
TPH = Total Petroleum Hydrocarbons – gasoline, diesel and oil- range by Ecology Methods NWTPH-G and NWTPH-Dx
BTEX = Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020
MTCA = Model Toxics Control Act (Method A Cleanup levels shown)
* = sample also exhibited detectable concentrations of chlorobenzene (9.2 ppb), n-Propylbenzene (1.1 ppb), 1,2,4 Trimethylbenzene (6.1 ppb), and sec-Butylbenzene (1.9 ppb).

Conclusions and Recommendations

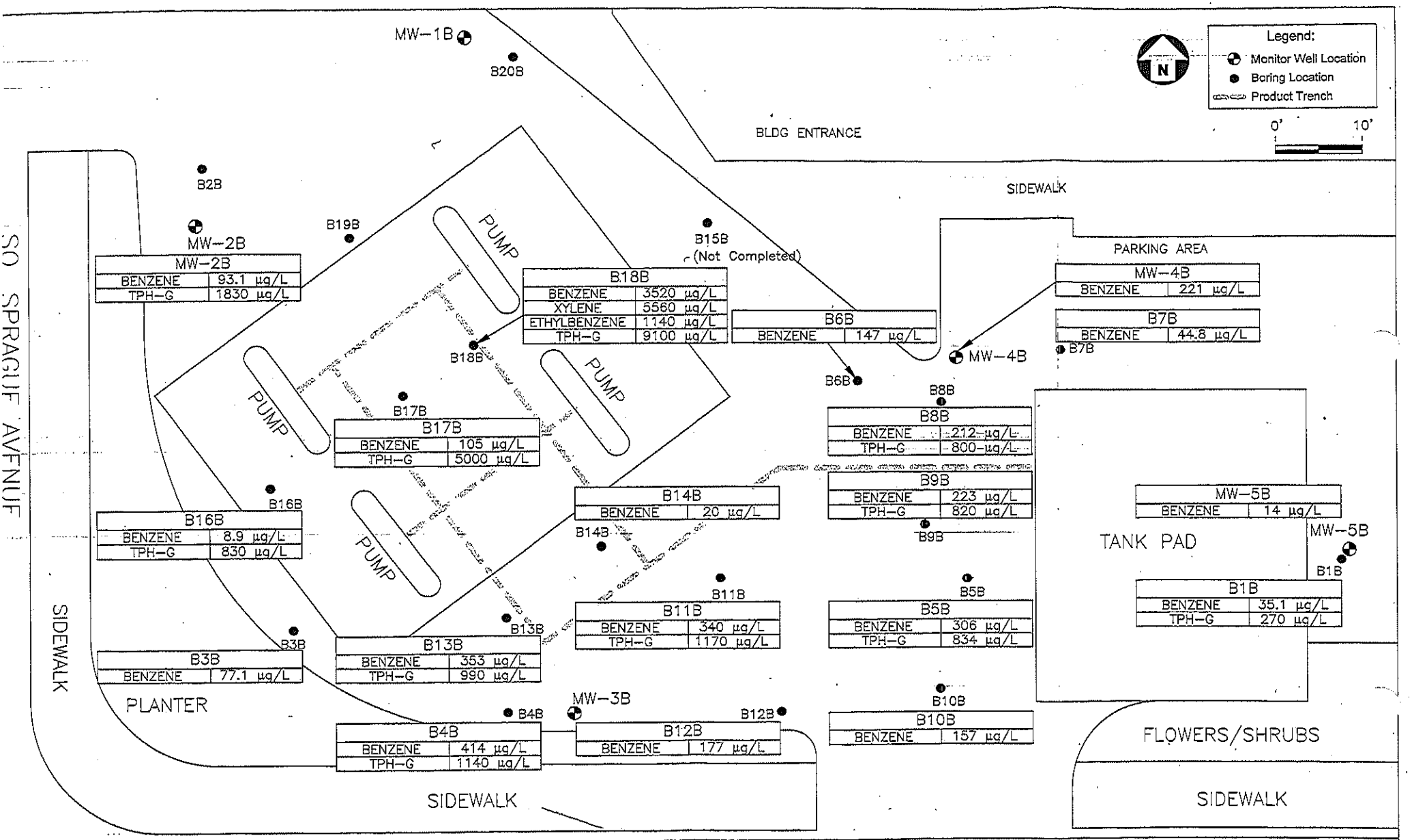
The results of Adapt's current assessment revealed the presence of petroleum hydrocarbon-impacted groundwater in the area of the former Pierce Transit oil/water separator, and benzene impacted groundwater adjacent to the UST and service islands associated with the on-site Shell station. These conditions represent a potential "Recognized Environmental Condition" associated with the property. Further subsurface sampling and analytical testing work would be required to assess the extent of the groundwater contamination plume and the potential monetary liability associated with the release.

The results of our assessment revealed the presence of soils exhibiting TPH concentrations in excess of MTCA Method A cleanup levels. According to WAC 173-340-300, "any owner or operator who has information that a hazardous substance has been released to the environment at the owner or operator's facility and may be a threat to human health and the environment shall report such information to the department (of Ecology) within 90 days of discovery. Releases from underground storage tanks shall be reported by the owner or operator of the underground storage tank within 24 hours of release confirmation, in accordance with WAC 173-340-450." We recommend contacting an environmental attorney regarding this issue.



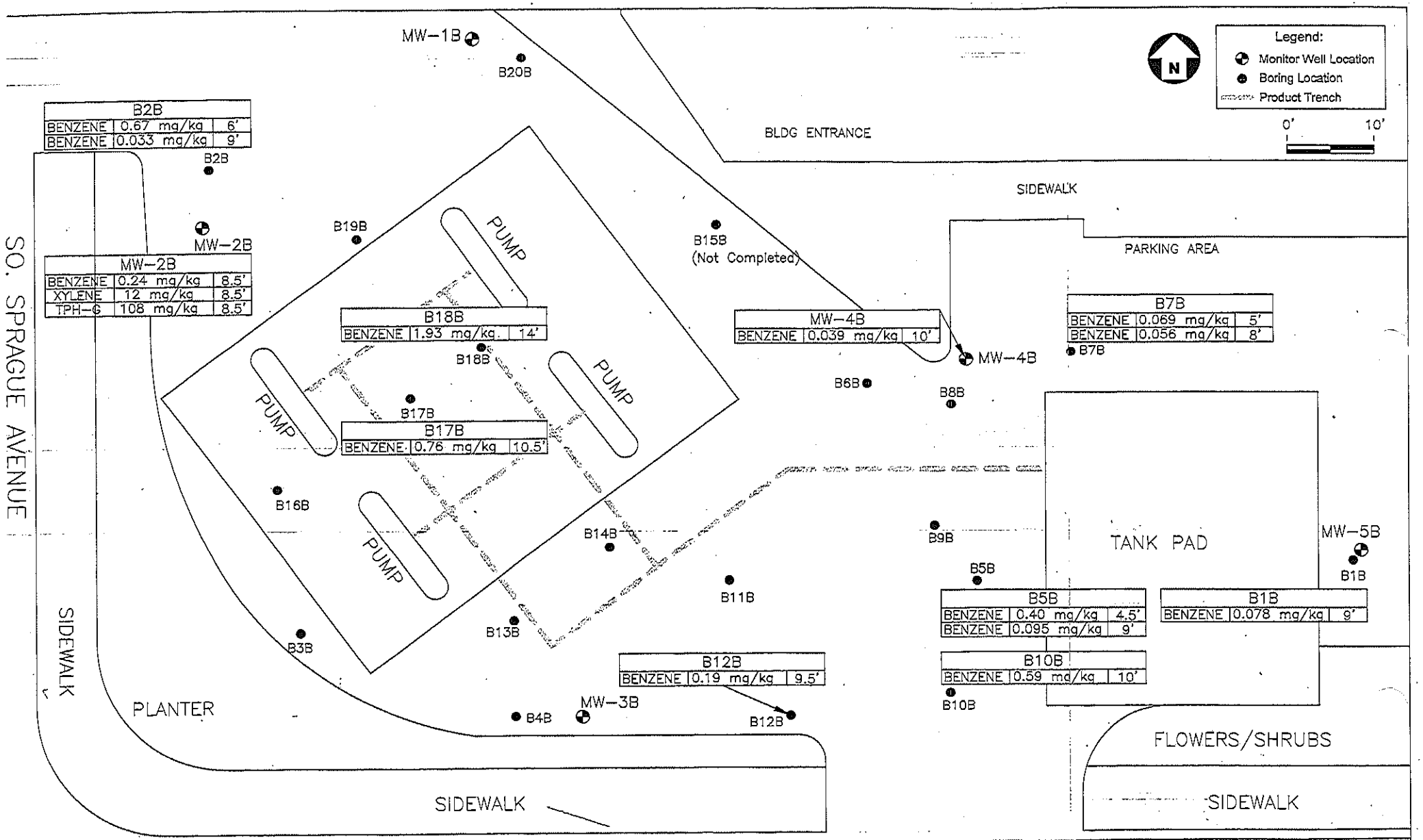
ROBINSON NOBLE SALTBUSH INC. WATER & ENVIRONMENTAL SCIENTISTS 60 Years 1947	PM: JFH	Pierce County
	June 2007	T 20 N/R 03 E - 05
	2144-004B	Scale 1" = 10'

Figure 3
Potentiometric Surface Contour Map
Bodine Enterprises:1401 So. Sprague, UST Investigation



ROBINSON NOBLE SALTBUSH INC. GROUNDWATER & ENVIRONMENTAL SCIENTISTS 60 Years 2007	PM: JFH	Pierce County
	June 2007	T 20 N/R 03 E - 05
	2144-004B	Scale-1" = 10'

Figure 4
Groundwater Concentrations Above MTCA Method A
Bodine Enterprises:1401 So. Sprague, UST Investigation

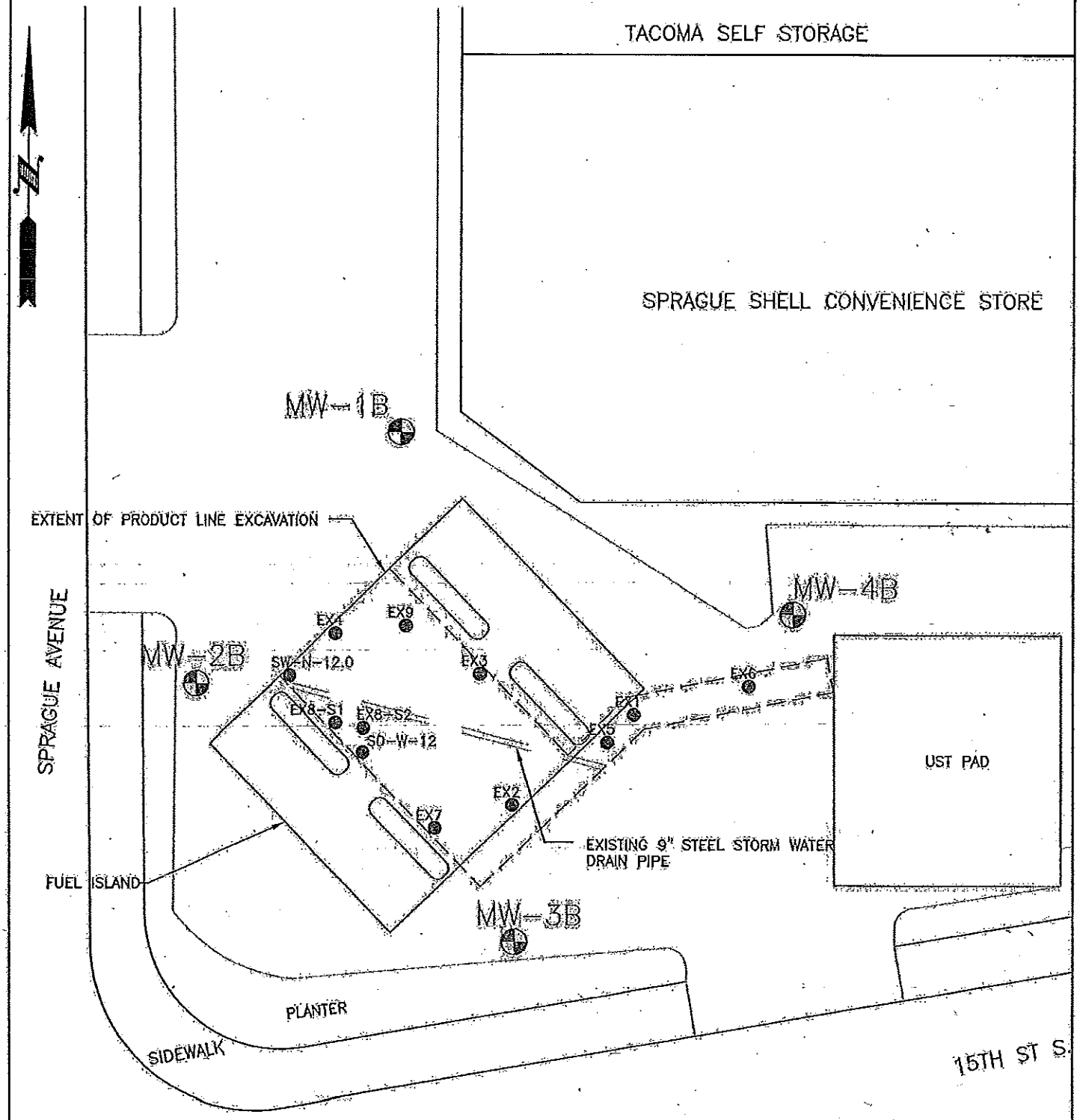


ROBINSON NOBLE SALTBUSH INC. GROUNDWATER & ENVIRONMENTAL SCIENTISTS 60 Years

PM: JFH	Pierce County	
June 2007	T 20 N/R 03 E - 05	
2144-004B	Scale 1" = 10'	

Figure 5
Soil Concentrations Exceeding MTCA Method A
Bodine Enterprises 1401 So. Sprague - UST Investigation

Notes: (a) The locations of all features shown are approximate.
(b) This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
Reference: Drawing created from sketch provided by AEGs' personnel and previous drawing by Robinson & Noble.



DRAWING SCALE: 1"= 20'

ASSOCIATED ENVIRONMENTAL GROUP, LLC
1728 State Avenue NE, Suite 101
Olympia, WA 98506
(360) 352-9835 Fax (360) 352-8164

FIGURE 2
PRODUCT LINE EXCAVATION PLAN

SPRAGUE SHELL
1401 S SPRAGUE AVE
TACOMA, WA

Project# 07-206	Date: 12/07/2007
File: SPRAGUE	Sheet 2 OF 2

Table 1 Summary of Soil Analytical Results - Product Line Excavation
Sprague Shell
Tacoma, Washington

[illegible]	[illegible]	[illegible]	Benzene	[illegible]	[illegible]	Xylenes	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NT
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Stockpile-1	[illegible]	—	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Stockpile-2	[illegible]	—	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
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Notes:
[1]Approximate sample locations are shown in Figure 2
[2]Analyzed by EPA Method 8260B
[3]Analyzed by Northwest Method NWTPH-Gx
[4]Analyzed by EPA Method 7421
mg/K = milligrams per kilogram
"<" not detected above laboratory detection limits

— Not applicable
MTBE = methyl tertiary-butyl ether
NT = Not tested
PQL = Practical Quantitation Limit
Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup levels
(shaded) Confirmation soil samples