STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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July 11, 2017

Mr. Bob Code
6900 Fox Avenue South
Seattle, WA 98108

Re: Review of the September 8, 2016 Underground Storage Tank Closure Report for the Fleischmann's Industrial Park Site, Sumner, Washington

- **Site Name:** Fleischmann's Industrial Park Site
- **Site Address:** 1700 Steele Avenue, Sumner, Washington
- **Facility/Site No.:** 85671776
- **Cleanup Site ID:** 12577
- **VCP Project No.:** SW1562

Dear Mr. Code:

The Washington State Department of Ecology (Ecology) received your request for review and subsequent opinion of the September 8, *2016 Underground Storage Tank Closure Report, Fleischmann's Industrial Park* (2016 UST Closure Report), located at 1700 Steele Avenue in Sumner, Washington (Subject Property). An application to enroll the Subject Property into Ecology's Voluntary Cleanup Program (VCP) was received on December 7, 2017, accompanied by a cover letter requesting a determination of "No Further Action" (NFA), using Model Remedy Option Number 3 (Publication No. 15-09-043, September 2015), for residual petroleum-impacts at the Subject Property.

This letter provides Ecology's review of the 2016 UST Closure Report and requests additional information regarding the site-characterization and excavation activities previously performed at the Subject Property.

Ecology is providing the following commentary, opinions, and requests under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Description of the Site

The **Site** is defined by the nature and extent of contamination associated with the historic release(s) of petroleum hydrocarbon fuels (gasoline, diesel, and heavy fuel oil) from the Fleischmann's Vinegar Facility, now located at 1700 Steele Avenue in Sumner, Washington (tax parcel ID 0420241154; **Subject Property**).

The Subject Property was part of the larger Fleischmann's Vinegar Site, listed with Ecology at 1115 Zehnder Street, in Sumner, Washington (**Site**) until 2008, when subdivision of the larger property resulted in the current Site configuration (**Figure 2**).

Basis for the Opinion

The opinions and evaluations presented herein are based on the information contained in the following documents:

1. Tacoma Pierce County Health Department, 2016. Letter titled *Underground Storage Tank Removal: Site Closure Determination*. October 27 (TPCHD Site Closure Letter);

2. Floyd Snider, 2016. *Underground Storage Tank Closure Report, Fleischmann's Industrial Park, Sumner, Washington*. September 8. (2016 UST Closure Report);

3. G-Logics, 2010. *Site Status, Underground Storage Tank Removal*. Letter to Rob Olson, Tacoma-Pierce county Health District. November 1 (2010 Site Status Report);

4. URS, 2002. *UST and AST Removal and Voluntary Cleanup Action Report*. May 17 (2002 UST/AST Removal Report);

5. Dames & Moore, 1999. *Environmental Update, Fleischmann's Yeast Facility, Sumner, Washington*. January 8 (1999 Environmental Update);

6. Hart Crowser, 1998. *Phase II Environmental Site Assessment, Fleischmann's Yeast Eastern Property, Sumner, Washington*. June 11 (1998 Phase II ESA).

The above documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at (360) 407-6365.

The opinions and evaluations presented here are void if any of the information contained in those documents is materially false or misleading.

September 8, 2016 Underground Tank Closure Report

Summary

Floyd Snider originally submitted the September 8, 2016 UST Closure Report to the Tacoma Pierce County Health Department (TPCHD), on behalf of Fleischmann's Industrial Park LLC.

The 2016 UST Closure Report presented a summary of soil and groundwater data in support of a request for closure of two underground storage tanks (USTs) previously removed from the Site. The request for closure necessitated a variance to the associated TPCHD UST Closure Permit (#RO0000605) because of the inability to achieve the "*full removal of all impacted soil"* at the Site (Floyd Snider, 2016). Based on the information contained in the 2016 UST Closure Report, a "Site Closure" determination was issued by TPCHD in a letter dated October 27, 2016 (TPCHD Site Closure Letter).

As appropriately noted in the 2016 UST Closure Report, request for Site closure through TPCHD was undertaken "*independently from regulatory closure of the property"* (i.e. distinct from closure through Ecology). Following receipt of the Site closure determination from TPCHD, the Site enrolled with the VCP in December of 2016 to request a similar (i.e. NFA) determination from Ecology "*using the Model Remedy option #3",* as noted in the associated VCP application cover letter. To support this request, representatives of Fleischmann's Industrial Park LLC (Fleischmann's) provided the 2016 UST Closure Report and subsequent TPCHD Site Closure Letter, along with the additional Site documents listed above.

The 2016 UST Closure Report summarized the results of an environmental investigation, performed by Floyd Snider during July of 2016. This investigation included the advancement of eleven direct-push borings (labelled FS-01 through FS-11) in areas reportedly exhibiting residual petroleum hydrocarbon contamination in soil above MTCA Method A cleanup levels (Method A CULs), specifically diesel- and oil-range organics (DRO and ORO, respectively). Residual hydrocarbons were documented in soil within the footprint of recently-demolished structures, which had previously limited soil-sample collection in these areas of the Subject Site.

Results of the July 2016 field investigation revealed the following:

- *"Strong field indications of petroleum contamination were observed in soil samples obtained from two soil borings (FS-05 and FS-06) advanced near the northern limit of prior excavation."* These borings were located immediately south of an east-west utility corridor that limited the excavation activities conducted during in this area of the Subject Site during October and November of 2001. Soil samples were collected from FS-05 and FS-06 between 3 and 5.5 feet below ground surface (ft bgs) at these boring locations and revealed the following:
    - Boring FS-05, 13,000 milligrams per kilogram (mg/kg) of Total Petroleum Hydrocarbons (TPH) as DRO (TPH-DRO) and 14,000 mg/kg TPH as ORO (TPH-ORO) in the soil sample collected from 3 to 5.5 ft bgs. <u>No deeper soil or groundwater samples were collected from this location</u>;
    - Boring FS-06, 3,000 mg/kg of TPH-DRO and 5,300 mg/kg of TPH-ORO in the soil sample collected from 3.5 to 5.5 ft bgs. <u>No deeper soil or groundwater samples were collected from this location</u>**;**

- Borings (FS-07 and FS-08) advanced north of the east-west utility corridor "*did not have any field evidence of contamination.*" Based on these results, the 2016 UST Closure Report opined that "*the heavy fuel release*" likely terminated within the utility corridor. Laboratory analysis of soil samples collected from the 5 to 6 ft bgs-intervals at these locations did not reveal detections of either TPH-DRO or TPH-ORO above their respective reporting limits. It should be noted, however, that the soil samples collected from these borings were not obtained from a comparable soil-interval as those associated with borings FS-05 and FS-06 (between 3 and 5.5 ft bgs); and

- A single groundwater sample was collected during the July 2016 field investigation (boring FS-09), in the area of previously excavated soil (**Attachment 1 [Figure 4]**). Laboratory analysis of the groundwater sample collected from this location revealed DRO in groundwater (160 micrograms per liter [µg/l]), however, the associated laboratory footnote for these results noted a chromatographic pattern inconsistent with the laboratory standard for diesel. Additionally, as stated in the 2016 UST Closure Report, FS-09 was selected as the sole groundwater sampling location during the July 2016 field investigation based on the presumed southerly groundwater flow beneath the Site and placement of this boring "*south of the borings with the greatest field indications of contamination*" (boring location FS-05). It is unclear why groundwater samples were not collected directly from boring locations FS-05 and FS-06, where evidence of petroleum impacts were encountered, if the intent was to evaluate the potential migration of hydrocarbons into shallow groundwater.

Ecology Opinion, Commentary, and Requests for Additional Information

Ecology has reviewed the 2016 Underground Storage Tank Closure Report and is providing the following commentary, opinions, and requests under the authority of Chapter 70.105D RCW of MTCA.

Request for Closure Using Model Remedies

1. Though a request for closure of the Subject Property "*using the Model Remedy option #3*" was made in the December 5, 2016 VCP Application cover letter, no specification was indicated as to whether those criteria should be compared to petroleum hydrocarbon impacts to groundwater, previously documented from the Subject Property (1998 Phase II ESA and 1999 Environmental Update), or to the residual hydrocarbon mass in shallow soil immediately north of the former transformer, power plant, and UST vault.

   In light of the documented impacts to groundwater, Ecology believes that Model Remedy Option #4 criteria for groundwater may be applicable, however, further groundwater monitoring will be needed to evaluate current groundwater conditions beneath the Subject

Property, as noted in **Item 1.3**, below.
If this evaluation reveals that groundwater beneath the Subject Property is no longer impacted by petroleum hydrocarbons or associated chemical constituents, Model Remedy Option #2 criteria for groundwater may be requested once all applicable requirements associated with that option have been met. The following additional criteria and requirements should also be considered and addressed:

1.1. *The primary remedy consists of source removal (in this case, excavation) to the greatest degree practicable (applicable to Model Remedy Options #3 [soil] and Option #4 [groundwater])*

While Ecology understands the limitation that the east-west utility corridor poses to further excavation toward the north, the majority of residual soil contamination appears to occur south, and just outside, of that corridor. Additionally, the structural impediments that precluded excavation of this residual mass are no longer present on the Subject Property. Please provide a rationale as to why residual petroleum hydrocarbons in soil to the south of the utility corridor cannot be further excavated. Additional information regarding the nature and extent of the utility corridor is requested in **Item 3.1**, below.

1.2. *The site characterization confirms that no other pathway has been, or can reasonably be expected to be, impacted*

Though documentation of petroleum impacts to groundwater beneath the Subject Site has previously been provided, no discussion of potential vapor-pathways have been presented for the Subject Property; specifically, the potential for petroleum soil-vapor to adversely affect on-Site personnel in the immediate vicinity of the residual hydrocarbon mass, north of the former transformer, power plant, and UST vault. Because the 1,500 mg/kg direct-contact TPH cleanup level has not been obtained for soil beneath the Subject Property, please provide a discussion of planned redevelopment activities and proposed structures in the vicinity of residual hydrocarbon mass. Please also provide an assessment of potential vapor-intrusion issues, relating to any proposed structures, if proposed, as well as an evaluation of potential risk to on-Site utility-workers and the means by which contact to residual hydrocarbons in shallow soil will be limited.

1.3. *Sufficient monitoring must be performed to document that the Method A cleanup levels are met in groundwater beneath the Subject Site*

According to Table 2 (*Analytical Results for Petroleum in Groundwater*) of the 2016 UST Closure Report, monitoring locations in the immediate vicinity of the petroleum-impacted areas of the Site (MW-1 through MW-5) have not been sampled since

November of 2000.
Additionally, only a single grab-groundwater sample (FS-09) was collected during 2016 soil and groundwater investigation. The stated purpose of this investigation was "*to assess current soil and groundwater conditions in the vicinity of the remaining residually-contaminated soils*". As such, Ecology considers these actions insufficient to assess current groundwater conditions at the Subject Property, and is therefore requesting the completion of a groundwater monitoring event, incorporating each of the aforementioned monitoring points (MW-1 through MW-5).

Please note that all samples collected from the Site should be analyzed for all fuels documented as present in the subsurface (diesel, gasoline, and heavy fuel oils), along with the appropriate, associated chemical constituents (i.e. carcinogenic polycyclic aromatic hydrocarbons [cPAHs], naphthalenes, polychlorinated biphenyls [PCBs], and volatile organic compounds [VOCs]), in accordance with Table 830-1.

When reporting the above data to Ecology, please include all field logs and copies of associated analytical laboratory reports. Additionally, all available historical and prospective Site data should be entered into Ecology's Environmental Information Management system (EIM), as described in **Item 5**, below. In an email dated May 15, 2017, Ecology personnel relayed this requirement to the project representative (Tom Colligan [Floyd Snider]). It is Ecology's understanding that Site data collected during the fall of 2016 will be uploaded to EIM in accordance with that request.

1.4. *Placement of an Environmental Covenant on the Subject Site*

Selection of the appropriate Model Remedy option for the Subject Site will likely necessitate the placement of an Environmental Covenant to restrict activities that may encounter PCS where it is considered still present. As part of this Environmental Covenant, long-term monitoring of groundwater using standard Points of Compliance will be needed. Therefore, in addition to filing an Environmental Covenant for the Site, a groundwater monitoring plan will need to prepared and submitted to Ecology for approval.

The process for drafting and filing the EC include the following steps:

- Conduct a title search to identify all persons holding an interest in the real property subject to the covenant. To save time later, you should conduct the search as early in the process as possible. Ecology will not sign the covenant unless all interest holders are willing to sign on as grantors or subordinate their interests. See step 5 below.

- Draft the covenant using the boilerplate document available on the VCP web site: www.ecy.wa.gov/programs/tcp/vcp/vcp2008/vcpRequirements.html. Please note that any changes to the boilerplate language in the covenant must be approved by the Attorney General's Office.

- Submit the draft covenant for review and comment to the appropriate land use planning authority in your jurisdiction. When requesting such review, please do the following:

- Send a copy of your written request.
- Provide the authority with my contact information.
- Request that the authority send me a copy of any written response.

    - Ecology will not approve the covenant unless the authority has been adequately consulted.

- Upon completing your consultations with the local land use planning authority, submit the draft covenant to Ecology for review and approval. Unless already submitted, also submit to Ecology any comments provided by the planning authority or, if none were provided, documentation of your consultation.

- Upon Ecology approval, obtain the signatures of all grantors of the covenant and obtain subordination agreements with any persons holding an interest in the real property subject to the covenant who are not signing the covenant as a grantor.

- Upon obtaining the signatures of the grantors and any necessary subordination agreements, submit the covenant to Ecology for its signature as the grantee.

- Upon obtaining Ecology's signature, record the covenant in every county where the real property subject to the covenant is located. For detailed recording instructions, please refer to Chapter 65.04 RCW.

- Upon recording, return the original signed and recorded covenant to Ecology and provide a copy of the recorded covenant to the following persons:

    - Each person that signed the covenant.
    - Each person holding a recorded interest in the real property subject to the covenant.
    - Each person in possession of the real property subject to the covenant at the time the covenant is executed.
    - Each municipality or other unit of local government in which real property subject to the covenant is located.

- Any other persons Ecology requires.

The copy must be legible and the recording number must be evident.

For more information on how to create an environmental covenant, please refer to the Uniform Environmental Covenants Act (UECA), Chapter 64.70 RCW, and WAC 173-340-440 of the MTCA Cleanup Regulation.

Need for Adequate Historical Site-Synthesis Report and Conceptual Site Model

2. The 2016 UST Closure Report fails to adequately capture historical investigation and remediation activities performed at the Subject Property performed since approximately 1995 (i.e. Hart Crowser's Preliminary Environmental Assessment of the Subject Property). Ecology is therefore requesting submittal of a report synthesizing historical investigation and remediation activities conducted at the Subject Property, which should include the following reporting elements:

   2.1. A comprehensive summary of the results of environmental activities previously presented in the following documents:

   - G-Logic's 2010 Site Status Report;
   - URS' 2002 UST/AST Removal Report;
   - Dames & Moore's 1999 Environmental Update; and
   - Hart Croeser's 1998 Phase II ESA.

   The historical Site-synthesis should also include any additional investigation or remedial activities not captured in the above documents.

   2.2. Summary tables of all soil and groundwater analytical data collected from the Subject Property. During Ecology's review of the 2016 UST Closure, key soil boring data, revealing elevated concentrations of petroleum hydrocarbons in soil (e.g. samples P1-S1 and P2-S1, collected during January of 1998 [Hart Crowser 1998, Table 1) and groundwater (e.g samples S-1-W and S-2-W, collected during January of 1999 [Dames & Moore 1999, Table 6] and samples P1 and P2, collected during January of 1998 [Hart Crowser 1998, Table 2]). Please be sure to include and depict these data in the requested historical Site-synthesis report.

2.3. A conceptual site model with figures, including the following:

- A revised Figure 3 (2016 UST Closure Report) clearly depicting all environmental soil-boring locations and associated results for DRO and ORO collected from the Subject Property. All samples and boring locations depicted on this revised figure should be clearly labelled, identified, and correspond with a data table indicating sample results and associated depth intervals for each sample location to assure samples were collected from comparable depth intervals;
- Geologic cross-sections encompassing areas of residual contamination, depicting all data, posted at their appropriate depth-intervals, used to establish the nature and extent of the remaining hydrocarbon mass. These cross-sections should include soil borings, monitoring locations (illustrating screened intervals), maximum water table elevations, surface features, infrastructure limiting investigation or remediation, and any natural or man-made features that may affect the fate and transport of contaminants in the subsurface (e.g. utility corridors, water-bearing intervals, etc.);
- A groundwater elevation map, clearly depicting the water level elevation data used to construct that map. For example, Figure 4 of the 2016 UST Closure Report depicts a southwesterly groundwater gradient ("flow direction"), however, no water table-elevation values are posted for Site monitoring locations;
- All available Site boring and well installation logs; and
- Tabulated, historical water-quality and well data available for the Subject Site, including:
    - Well IDs and groundwater-bearing zone being monitored;
    - Surface elevations for each groundwater monitoring well;
    - Reference elevations (e.g. top-of-casing elevation) for each groundwater monitoring well;
    - Top-of-screen elevations for each groundwater monitoring well;
    - Bottom of well casing elevation for each groundwater monitoring well; and
    - Historical and current water-quality and groundwater elevation data for each monitoring location within the well network.

As part of this submittal, Ecology recommends inclusion of the vapor-intrusion discussion and additional groundwater monitoring data, as requested in **Items 1.2 and 1.3**, respectively.

2.4. A summary of the excavation activities, performed at the Subject Site between October and November of 2001. Site documentation reviewed by Ecology does not sufficiently described the depths of the 2001 excavation. As such, it is difficult to evaluate residual soil impacts, documented through soil samples collected in the vicinity of the on-Site USTs/ASTs, relative to excavated soil-depths.

3. Ecology is also requesting that you address the following requests for information and potential data gaps in the above-requested transmittal:

3.1. The 2016 Closure Report stated that, based on the lack of detectable DRO and ORO hydrocarbons in the soil samples collected from between 5 and 6 ft bgs at soil borings FS-05 and FS-06, that the *"heavy fuel release terminates within the utility nest"*. The 2016 UST Closure Report failed to address the potential for lateral, east-west migration of hydrocarbons within the utility trench. Because of the potential for this preferential pathway to convey hydrocarbons off-Property, please provide additional information regarding the off-Property, eastern-extent of this utility corridor, the potential presence of groundwater therein, and any additional, supporting information delineating the east-west extent of hydrocarbon impacts within this trench.

3.2. Due to the close proximity of the City of Sumner Water Supply Well (**Figure 2**), please provide additional information regarding this well (e.g. specific location, screened interval(s), current usage, etc.) and an evaluation of environmental risk posed by the Site to this potential receptor.

4. Though footnotes associated with tabulated data contained within the 2016 UST Closure Report suggest the use of Method A CULs for groundwater and Method A Soil CULs for Industrial Properties for soil, no indication is made regarding these selections or use of specific cleanup standards within the body of the 2016 UST Closure Report. Please note that all future submittals should clearly reference the CULs being proposed for application for each media and that all tabulated data should list the specific CUL used for comparison for each COPC.

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 simultaneously in both written and electronic formats. According to the policy, any reports containing sampling data that are submitted for Ecology review are considered incomplete until the electronic data has been entered into EIM. Please ensure that data generated during on-Site activities is submitted pursuant to this policy. For additional information regarding electronic format requirements, see the website http://www.ecy.wa.gov/eim.

Limitations

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you proposed will be substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

4. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Contact Information

Thank you for choosing to clean up the Site under the VCP. As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at (360) 407-0276 or e-mail at Jeremy.Hughes@ecy.wa.gov.

Sincerely,

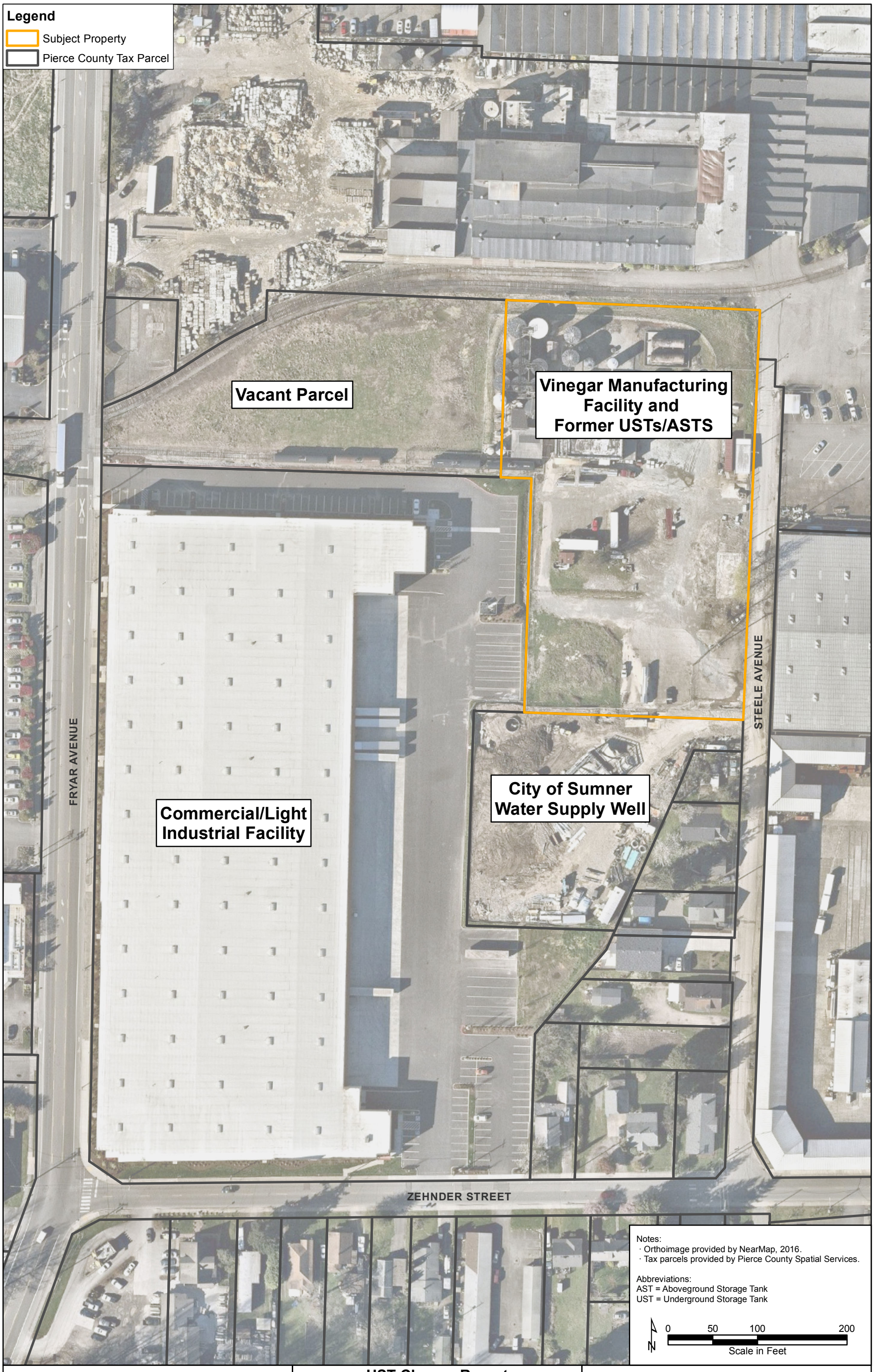
Jeremy Hughes, L.G.
VCP Site Manager
Toxics Cleanup Program, Southwest Regional Office
Washington State Department of Ecology

Attachments [1]
1. Figures 2 through 4

JJH: kb

By Certified Mail: [91 7199 9991 7037 0291 6401]

cc: Tom Colligan, Floyd Snider
Rob Olsen, Tacoma Pierce County Health Department
Nicholas Acklam, Ecology



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UST Closure Report
Fleishmann's Industrial Park
1700 Steele Avenue
Sumner, Washington

Figure 2
Current Property Usage

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9/8/2016

Legend

- Geoprobe Sample Below Cleanup Level (Floyd|Snider 2016)
- Geoprobe Sample Above Cleanup Level (Floyd|Snider 2016)
- Confirmation Sample Below Cleanup Level (URS 2000)
- Confirmation Sample Above Cleanup Level (URS 2000)
- Test Pit (URS 2000)
- Geoprobe (Hart Crowser 1999)
- StrataProbe (Dames & Moore 1998)
- Previous Excavation Extent
- Approximate Extent of Residual Contamination
- Structures of Interest
- Subject Property

Utilities (Approximate Locations)

- Underground fire hydrant supply line
- Underground power
- Underground sanitary or process waste water sewer
- Underground stormwater line
- Underground water line

Location Labels:

PEX-52
@7-7ft
(Nov-2000)
DRO: 1,800
ORO: **4,900**

- *Location ID*
- *Sample Depth Interval*
- *Sample Month/Year*
- *DRO Concentration in mg/kg*
- *ORO Concentration in mg/kg*

FS-08
@5-6ft
(Jul-2016)
DRO: ND
ORO: ND

FS-05
@3-5.5ft
(Jul-2016)
DRO: **13,000**
ORO: **14,000**

Outbuilding (Under Construction)

FS-07
@5-6ft
(Jul-2016)
DRO: ND
ORO: ND

UTILITY CORRIDOR

FS-06
@3.5-5.5ft
(Jul-2016)
DRO: **3,000**
ORO: **5,300**

PEX-52
@7-7ft
(Nov-2000)
ORO: **4,900**

PEX-42
@7-7ft
(Nov-2000)
DRO: **2,100**

FS-10
@3.5-4.5ft
(Jul-2016)
DRO: ND
ORO: ND

Former Transformer

FS-02
@3.5-4.5ft
(Jul-2016)
DRO: 1,000
ORO: ND

Former Power Plant

Former Boiler USTs

FS-01
@6-7ft
(Jul-2016)
DRO: ND
ORO: ND

Former Diesel AST

Former AST Confinement Vault

FS-03
@3-4ft
(Jul-2016)
DRO: ND
ORO: ND

FS-04
@8.5-9.5ft
(Jul-2016)
DRO: ND
ORO: ND

FS-11
@4.5-5.5ft
(Jul-2016)
DRO: 440
ORO: 440

Notes:
- RED TEXT indicates exceedance of MTCA Method A Cleanup Level.
- Orthoimage provided by NearMap, 2016.
- Tax parcels provided by Pierce County Spatial Services.

Abbreviations:
AST = Aboveground storage tank
DRO = Diesel-range organics
ft = Feet
mg/kg = Milligrams per kilogram
MTCA = Model Toxics Control Act
ND = Non-Detect
ORO = Oil-range organics
UST = Underground storage tank

N

0 15 30 60

Scale in Feet

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UST Closure Report
Fleishmann's Industrial Park
1700 Steele Avenue
Sumner, Washington

Figure 3
Diesel- and Oil-Range Organics in Soil

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9/8/2016

Legend

- Geoprobe Sample (Floyd|Snider 2016)
- Monitoring Well Sample (URS 2000)
- Geoprobe Sample (Hart Crowser 1999)
- StrataProbe Sample (Dames & Moore 1998)
- Approximate Groundwater Flow Direction
- Previous Excavation Extent
- Approximate Extent of Residual Contamination
- Structures of Interest
- Subject Property

Utilities (Approximate Locations)

- Underground fire hydrant supply line
- Underground power
- Underground sanitary or process waste water sewer
- Underground stormwater line
- Underground water line

Location Labels:

FS-08
(Jul-2016)
DRO: 160
GRO: ND
ORO: ND

- ← *Location ID*
- ← *Sample Month/Year*
- ← *DRO Concentration in µg/L*
- ← *GRO Concentration in µg/L*
- ← *ORO Concentration in µg/L*

Outbuilding
(Under Construction)

UTILITY CORRIDOR

FS-09:
(Jul-2016)
DRO: 160
GRO: ND
ORO: ND

MW-2-00:
(Nov-2000)
DRO: ND
ORO: ND

Former Transformer

MW-1-00:
(Nov-2000)
DRO: ND
ORO: ND

MW-5-00:
(Nov-2000)
DRO: ND
ORO: ND

Former Power Plant

Former Boiler USTs

Former Diesel AST

Former AST Confinement Vault

P-3:
(Jan-1998)
DRO: ND
ORO: ND

S-9:
(Nov-1998)
DRO: ND
ORO: ND

MW-4-00:
(Nov-2000)
DRO: ND
ORO: ND

MW-3-00:
(Nov-2000)
DRO: ND
ORO: ND

S-10:
(Nov-1998)
DRO: ND
ORO: ND

S-11:
(Nov-1998)
DRO: ND
ORO: ND

P-13:
(Jan-1998)
DRO: ND
GRO: ND
ORO: ND

Notes:
· Orthoimage provided by NearMap, 2016.
· Tax parcels provided by Pierce County Spatial Services.

Abbreviations:
AST = Aboveground storage tank
DRO = Diesel-range organics
ft = Feet
GRO = Gasoline-range organics
MTCA = Model Toxics Control Act
ND = Non-detect
ORO = Oil-range organics
µg/L = Micrograms per liter
UST = Underground storage tank

N
0 15 30 60
Scale in Feet

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UST Closure Report
Fleischmann's Industrial Park
1700 Steele Avenue
Sumner, Washington

Figure 4
Diesel-, Gasoline-, and Oil-Range Organics in Groundwater

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9/8/2016