

April 9, 2014

Voluntary Cleanup Program Site Manager
Southwest Region – Toxics Cleanup Program
Washington State Department of Ecology
300 Desmond Drive Southeast
Lacey, WA 98503

Attention: **Tim Mullin, LG**

Re: **Gig Harbor Transmission Terrestrial Ecological Evaluation**

14610 Purdy Drive NW
Gig Harbor, Washington
VCP ID Number: SW1590

Dear Mr. Mullin:

Attached is the completed Terrestrial Ecological (TEE) form for the Gig Harbor Transmission Site. We believe that this site qualifies for an exclusion under WAC 173-340-7491.

The exclusion is based on that there is less than 0.25 acres of contiguous undeveloped land on or within 500 feet of the Site.

The Site is a commercial auto repair facility in an area that is currently zone Rural 10 (R10) by Pierce County. The vicinity is occupied by primarily residential developments. The Site is bounded by small commercial and residential developments to the north; by Sherman Drive Northwest to the west, with residential developments beyond the road. To the South are Pacific Northwest Auto Sales and the Floatation Device Pub and Grill. To the east is Purdy Drive Northwest with a park and ride parking lot and residential developments beyond the road.

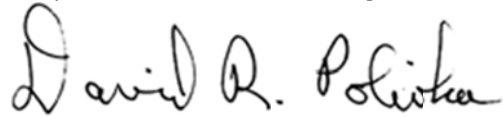
Attached to the TEE form is an aerial photo taken from Google earth that shows a 500-foot radius circle around the site showing development in the area that was described above. Also attached is a zoning map obtained from the Pierce County Public GIS website showing the site located in the R10 zoning.

We believe that this form along with the previously submitted reports will provide you enough information to issue a “No Further Action” determination for the Site.

11435 Pacific Highway, SW
Lakewood, Washington 98499

Let me know if you have any questions.

Sincerely,
ECI | Environmental Consulting



David R. Polivka L. G./ L.Hg.
Senior Hydrogeologist
Direct: (360) 349-0851
Office: (253) 238-9270
Fax; (253) 369-6228
E-mail: david@ecocon.us

Attachments: Terrestrial Ecological Evaluation Form



Voluntary Cleanup Program

Washington State Department of Ecology Toxics Cleanup Program

TERRESTRIAL ECOLOGICAL EVALUATION FORM

Under the Model Toxics Control Act (MTCA), a terrestrial ecological evaluation is necessary if hazardous substances are released into the soils at a Site. In the event of such a release, you must take one of the following three actions as part of your investigation and cleanup of the Site:

1. Document an exclusion from further evaluation using the criteria in WAC 173-340-7491.
2. Conduct a simplified evaluation as set forth in WAC 173-340-7492.
3. Conduct a site-specific evaluation as set forth in WAC 173-340-7493.

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation.

Completion of this form is not sufficient to document your evaluation. You still need to document your analysis and the basis for your conclusion in your cleanup plan or report.

If you have questions about how to conduct a terrestrial ecological evaluation, please contact the Ecology site manager assigned to your Site. For additional guidance, please refer to www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are documenting an evaluation.

Facility/Site Name: Gig Harbor Transmission

Facility/Site Address: 14610 Purdy Drive Northwest Gig Harbor, Washington 98332

Facility/Site No: 11876

VCP Project No.: SW1590

Step 2: IDENTIFY EVALUATOR

Please identify below the person who conducted the evaluation and their contact information.

Name: David R. Polivka

Title: Senior Hydrogeologist

Organization: ECI, Inc.

Mailing address: P.O. Box 153

City: Fox Island

State: WA

Zip code: 98333

Phone: 253-238-9270

Fax: 253-369-6228

E-mail: david@ecocon.us

Step 3: DOCUMENT EVALUATION TYPE AND RESULTS

A. Exclusion from further evaluation.

1. Does the Site qualify for an exclusion from further evaluation?

- Yes *If you answered "YES," then answer **Question 2**.*
- No or Unknown *If you answered "NO" or "UNKNOWN," then skip to **Step 3B** of this form.*

2. What is the basis for the exclusion? Check all that apply. Then skip to **Step 4** of this form.

Point of Compliance: WAC 173-340-7491(1)(a)

- All soil contamination is, or will be,* at least 15 feet below the surface.
- All soil contamination is, or will be,* at least 6 feet below the surface (or alternative depth if approved by Ecology), and institutional controls are used to manage remaining contamination.

Barriers to Exposure: WAC 173-340-7491(1)(b)

- All contaminated soil, is or will be,* covered by physical barriers (such as buildings or paved roads) that prevent exposure to plants and wildlife, and institutional controls are used to manage remaining contamination.

Undeveloped Land: WAC 173-340-7491(1)(c)

- There is less than 0.25 acres of contiguous[#] undeveloped[±] land on or within 500 feet of any area of the Site and any of the following chemicals is present: chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.
- For sites not containing any of the chemicals mentioned above, there is less than 1.5 acres of contiguous[#] undeveloped[±] land on or within 500 feet of any area of the Site.

Background Concentrations: WAC 173-340-7491(1)(d)

- Concentrations of hazardous substances in soil do not exceed natural background levels as described in WAC 173-340-200 and 173-340-709.

* An exclusion based on future land use must have a completion date for future development that is acceptable to Ecology.

[±] "Undeveloped land" is land that is not covered by building, roads, paved areas, or other barriers that would prevent wildlife from feeding on plants, earthworms, insects, or other food in or on the soil.

[#] "Contiguous" undeveloped land is an area of undeveloped land that is not divided into smaller areas of highways, extensive paving, or similar structures that are likely to reduce the potential use of the overall area by wildlife.

B. Simplified evaluation.

1. Does the Site qualify for a simplified evaluation?

- Yes *If you answered "YES," then answer **Question 2** below.*
- No or Unknown *If you answered "NO" or "UNKNOWN," then skip to **Step 3C** of this form.*

2. Did you conduct a simplified evaluation?

- Yes *If you answered "YES," then answer **Question 3** below.*
- No *If you answered "NO," then skip to **Step 3C** of this form.*

3. Was further evaluation necessary?

- Yes *If you answered "YES," then answer **Question 4** below.*
- No *If you answered "NO," then answer **Question 5** below.*

4. If further evaluation was necessary, what did you do?

- Used the concentrations listed in Table 749-2 as cleanup levels. *If so, then skip to **Step 4** of this form.*
- Conducted a site-specific evaluation. *If so, then skip to **Step 3C** of this form.*

5. If no further evaluation was necessary, what was the reason? Check all that apply. Then skip to **Step 4** of this form.

Exposure Analysis: WAC 173-340-7492(2)(a)

- Area of soil contamination at the Site is not more than 350 square feet.
- Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.

Pathway Analysis: WAC 173-340-7492(2)(b)

- No potential exposure pathways from soil contamination to ecological receptors.

Contaminant Analysis: WAC 173-340-7492(2)(c)

- No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.
- No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations that exceed the values listed in Table 749-2, and institutional controls are used to manage remaining contamination.
- No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays.
- No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, and institutional controls are used to manage remaining contamination.

C. Site-specific evaluation. A site-specific evaluation process consists of two parts: (1) formulating the problem, and (2) selecting the methods for addressing the identified problem. Both steps require consultation with and approval by Ecology. See WAC 173-340-7493(1)(c).

1. Was there a problem? See WAC 173-340-7493(2).

- Yes *If you answered "YES," then answer **Question 2** below.*
- No *If you answered "NO," then identify the reason here and then skip to **Question 5** below:*
- No issues were identified during the problem formulation step.
 - While issues were identified, those issues were addressed by the cleanup actions for protecting human health.

2. What did you do to resolve the problem? See WAC 173-340-7493(3).

- Used the concentrations listed in Table 749-3 as cleanup levels. *If so, then skip to **Question 5** below.*
- Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate and address the identified problem. *If so, then answer **Questions 3 and 4** below.*

3. If you conducted further site-specific evaluations, what methods did you use?

Check all that apply. See WAC 173-340-7493(3).

- Literature surveys.
- Soil bioassays.
- Wildlife exposure model.
- Biomarkers.
- Site-specific field studies.
- Weight of evidence.
- Other methods approved by Ecology. If so, please specify:

4. What was the result of those evaluations?

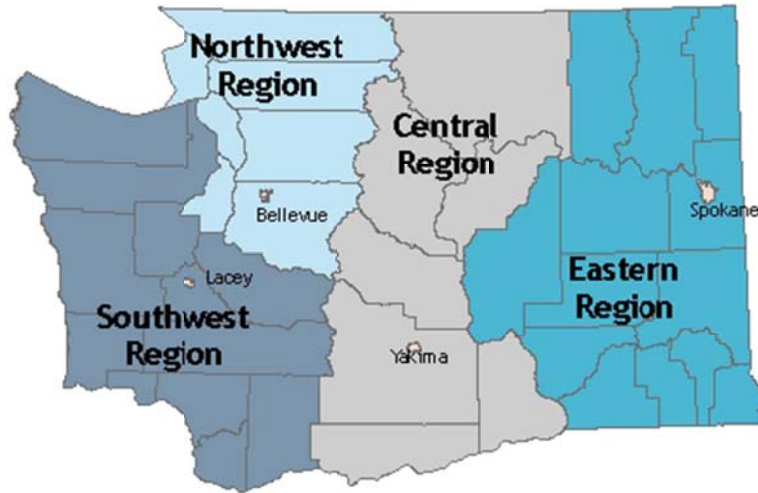
- Confirmed there was no problem.
- Confirmed there was a problem and established site-specific cleanup levels.

5. Have you already obtained Ecology's approval of both your problem formulation and problem resolution steps?

- Yes If so, please identify the Ecology staff who approved those steps:
- No

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.





Northwest Region: Attn: VCP Coordinator 3190 160 th Ave. SE Bellevue, WA 98008-5452	Central Region: Attn: VCP Coordinator 15 W. Yakima Ave., Suite 200 Yakima, WA 98902
Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775	Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Gig Harbor Transmission

500 foot radius from Gig Harbor Transmission showing area is residential with some wooded areas associated with residences. Less than 1.5 acres of contiguous undeveloped land

Legend

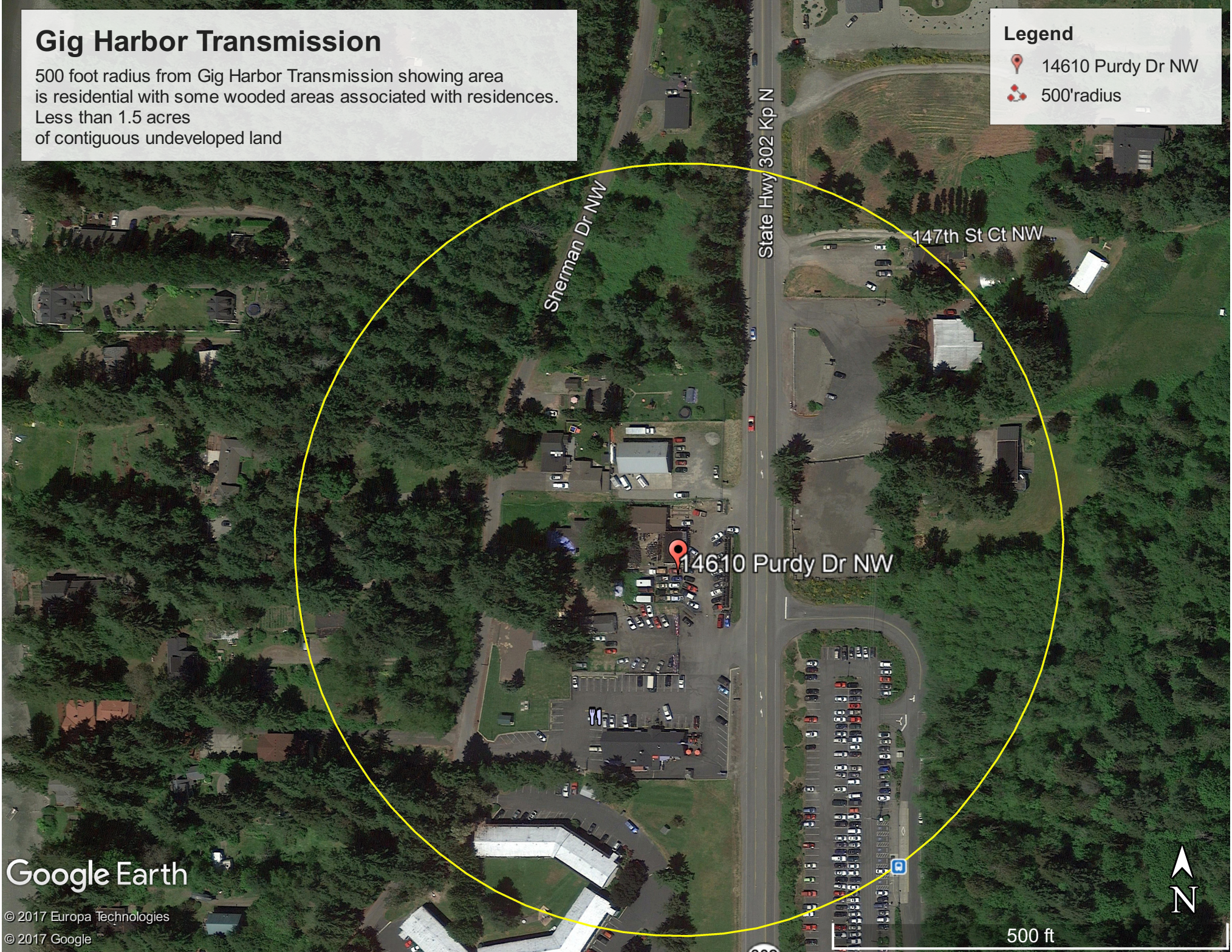
-  14610 Purdy Dr NW
-  500'radius

Google Earth

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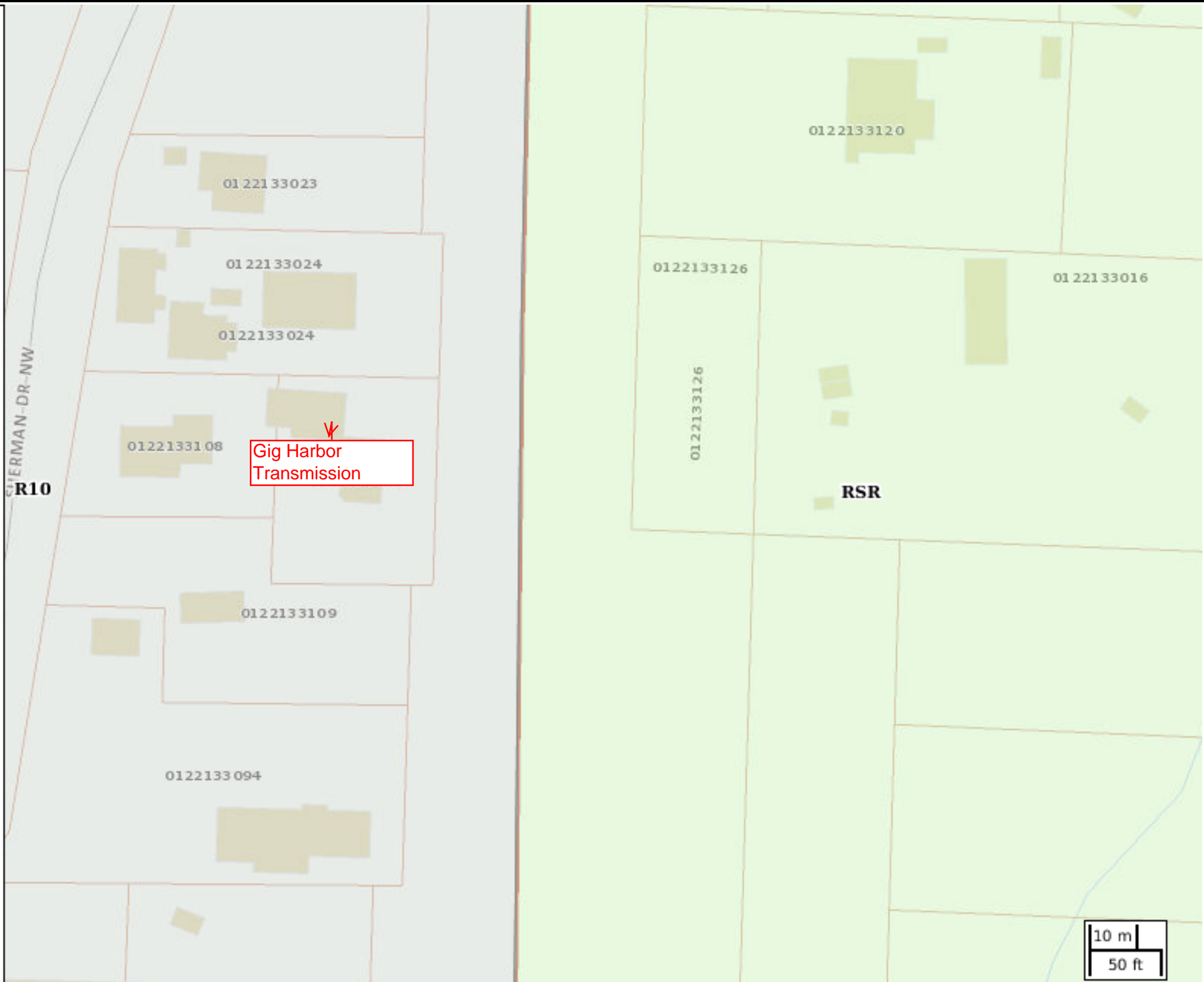
500 ft



Gig Harbor Transmission Zoning



- ### Zoning
- Activity Centers (AC)
 - Agricultural Resource Land (ARL)
 - Community Centers (CC)
 - Community Employment (CE)
 - Commercial Mixed Use Districts (CMUD)
 - Emp. Based Planned Communities (EBPC)
 - Employment Center (EC)
 - Ess. Pub. Fac./Rural Airport (EFRAN)
 - Ess. Pub. Fac./Rural Airport (EFRAS)
 - Employment Services (ES)
 - Designated Forest Land (FL)
 - Gateway Community (GC)
 - High Density Residential (HRD)
 - High Density Single-Family (HSF)
 - Moderate-High Density Residential (MHR)
 - Master Planned Communities (MPC)
 - Master Planned Resort (MPR)
 - Moderate Density Single-Family (MSF)
 - Mixed Use Districts (MUD)
 - Moderate Density Single-Family (MSF)
 - Mt. Rainier National Park
 - Major Urban Centers (MUC)
 - Neighborhood Centers (NC)
 - Office-Residential Mixed Use Districts (OMUD)
 - Public Institutional (PI)
 - Park and Recreation (PR)
 - Rural 10 (R10)
 - Rural 20 (R20)
 - Rural 40 (R40)
 - Rural Activity Center (RAC)
 - Rural Farm (RF)



Disclaimer: The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. The County assumes no liability for variations ascertained by actual survey. **ALL DATA IS EXPRESSLY PROVIDED 'AS IS' AND 'WITH ALL FAULTS'**. The County makes no warranty of fitness for a particular purpose. 2017/08/07