STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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May 16, 2017

Electronic Copy

Ms. Stephanie Lile
Executive Director
Harbor History Museum
4121 Harborview Drive
Gig Harbor, WA 98335

Re: No Further Action at the following Site:
Site Name: Peninsula Light Company (Gig Harbor Peninsula Historical Society)
Site Address: 4021 and 4121 Harborview Drive, Gig Harbor, WA 98335.
Facility/Site Number: 88123954
Cleanup Site ID Number: 6806
VCP Project Number: SW0634

Dear Ms. Lile:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Peninsula Light Company (Gig Harbor Peninsula Historical Society) Site. This is a follow-up opinion letter to Ecology's "Final No Further Action (Enclosure B)" letter of July 2, 2001 and a "Partial Sufficiency and Further Action (Enclosure C)" letter of August 16, 2006. These letters were issued by Ecology after the Site soil and groundwater met the Model Toxics Control Act (MTCA) Method A cleanup levels for the following:

- Total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene and xylenes (BTEX) in both soil and groundwater.
- Vinyl chloride in soil.

This no further action letter provides our opinion regarding the vinyl chloride in groundwater at the Site. We are providing this opinion under the authority of the MTCA, Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

No. Ecology has determined that no further remedial action is necessary to clean up the groundwater contamination at the Site

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and the implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release:

- Vinyl chloride in Groundwater.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note the parcels of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

This opinion regarding the groundwater at the Site is based on the information contained in the following documents:

1. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2017 First Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. March 28, 2017.

2. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2016 Fourth Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. December 2, 2016.

3. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2016 Third Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. July 19, 2016.

4. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2016 Second Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. May 26, 2016.

5. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2016 First Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. March 15, 2016.

6. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2015 Fourth Quarter),* Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. January 22, 2015.

7. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2015 Third Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. October 28, 2015.

8. Harbor History Museum/Trendline Environmental Chemistry, *Quarterly Groundwater Monitoring Report (2015 Second Quarter)*, Peninsula Light Company, 4121 Harborview Drive, Gig Harbor, Washington 98335. July 6, 2015.

9. Kleinfelder Inc., *Second Quarter 2007 Groundwater Monitoring,* The Gig Harbor Peninsula Historical Society, 4021 and 4121 Harborview Drive, Gig Harbor, Washington. May 2, 2007.

10. Kleinfelder Inc., *Supplemental Environmental Investigation at The Gig Harbor Peninsula Historical Society Site*, 4021 and 4121 Harborview Drive, Gig Harbor, Washington. March 2, 2007.

11. Department of Ecology, *Partial Sufficiency and Further Action Determination Letter, Gig Harbor Peninsula Historical Society (former Peninsula Light Company Headquarters)* 4021 and 4121 Harborview Drive, Gig Harbor, Washington. August 16, 2006.

12. Kleinfelder Inc., *Supplemental Environmental Investigation at the Gig Harbor Peninsula Historical Society Site*, 4021 and 4121 Harborview Drive, Gig Harbor, Washington. July 14, 2006.

13. Kleinfelder, Inc., *Environmental Work Plan*, Gig Harbor Peninsula Historical Society Site 4021 and 4121 Harborview Drive, Gig Harbor, Washington. November 28, 2005.

14. Kleinfelder, Inc., *Phase I and Phase II Environmental Site Assessment Proposed for Gig Harbor Historical Society Site* 4021 and 4121 Harborview Drive, Gig Harbor, Washington. December 14, 2004.

15. Department of Ecology, *Final No Further Action Letter*, Peninsula Light Company 4121 Harborview Drive, Gig Harbor, Washington. July 2, 2001.

16. Saltbush Environmental Services, Inc., *Quarterly Groundwater Monitoring Report*. The Former Peninsula Light Company Headquarters 4121 Harborview Drive, Gig Harbor, Washington. June 26, 2001.

17. Saltbush Environmental Services, Inc., *Quarterly Groundwater Monitoring Repor*t, The Former Peninsula Light Company Headquarters 4121 Harborview Drive, Gig Harbor, Washington. January 12, 2001.

18. Saltbush Environmental, Inc., *Independent Cleanup Report*, Former Peninsula Light Company Headquarters 4121 Harborview Drive, Gig Harbor, Washington. October 10, 2000.

19. Saltbush Environmental, Inc., *Contamination Delineation Study*, Interior of Means Ornamental Concrete Building. August 15, 2000.

20. Saltbush Environmental, Inc., *Environmental Assessment (Limited Soil & Groundwater Sampling and Testing)*, The Former Peninsula Light Company Headquarters Property Project 4121 Harborview Drive, Gig Harbor, Washington. June 27, 2000.

21. Pacific Testing Laboratories, *Gauging, Sampling and Analysis Groundwater Monitoring Wells*, 4021 Harborview Drive, Gig Harbor, Washington. May 22, 1997.

22. Pacific Testing Laboratories, *Final Report, Soils Remediation Activities*: Former Peninsula Light Storage Yard, Gig Harbor, Washington. October 29, 1992.

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.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further action** is necessary to clean up the groundwater contamination at the Site. That condition is based on the following analysis:

1. Site Characterization and Cleanup

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A.**

The Peninsula Light Company Site (Gig Harbor Peninsula Historical Society) is located at 4021 and 4121 Harborview Drive, Gig Harbor, Washington. The property consists of approximately 2.0-acres. The property is located east of the intersection between Harborview Drive, Harborview Drive North, and Burnham Drive within the City of Gig Harbor City limits. The waters and shoreline of Gig Harbor are immediately to the east. Currently there are three buildings on the property. The Main Building is occupied by the Gig Harbor Historical Museum, which include all the galleries and exhibits, the Midway School House is an artifact, and The Door Store which includes the Work Shop for the restoration of the Shenandoah Boat and an office that is currently leased to Brett Mario Design. The majority of the property is asphalt-paved.

Historically the property was a tideland until it was filled with imported material in 1910. It was used for timber storage until 1925. Peninsula Light Company (PLC) occupied the property from 1925 until 1986. The PLC developed the property by building Warehouse 1 and Warehouse 3 in 1925 and 1960s, respectively. Warehouse 1 was used as a utility vehicle maintenance and repair garage. Warehouse 3 was used for storing electrical transformers, office supplies and as the company vehicles garage. According to a historic Site plan, a gas pump was located on the northwest corner of the warehouse and apparently associated with two underground storage tanks (USTs). These USTs were probably contained diesel fuel and gasoline and were operated until late 1980s and USTs were removed in 1991. Previously the property was occupied by various retail and light commercial businesses including a used car dealership and repair.

In 1990 and 1991, Pacific Testing Laboratories (PTL) conducted soil and groundwater investigations in the vicinity of Warehouse 1 and Warehouse 3. Results of soil and groundwater samples indicated that the gasoline-range total petroleum hydrocarbons (TPH-G) and benzene, toluene, ethylbenzene and xylene (BTEX) concentrations exceeded the Model Toxics Control Act (MTCA) Method A cleanup levels. The petroleum contaminated soil was excavated from an area situated north of Warehouse 1.

In 1992, additional soil and groundwater investigations were conducted by the PTL in north of Warehouse 1 and south of Warehouse 3. The TPH-G and BTEX concentrations collected in south and southeast of Warehouse 3 were above the MTCA Method A cleanup levels. South of Warehouse 3 the contaminated soil was extended to a depth of approximately 10 feet. Soil and groundwater collected in the vicinity of Warehouse 1 did not show any contamination. The TPH-G and BTEX contaminated soils located south and east of Warehouse 3 were excavated and treated on-site by thermal desorption process and removed off-site. Subsequently, six soil borings were installed at the Site and all of these borings were converted into groundwater monitoring wells (MW-1 through MW-6). The results of quarterly groundwater monitoring conducted from 1993 through 1997 showed that TPH-G and BTEX concentrations consistently exceeded MTCA Method A cleanup levels.

As a result of consistent TPH-G and BTEX exceedances in groundwater, in 2000 Saltbush Environmental Services conducted a limited soil and groundwater sampling followed by over-excavating the TPH-G and BTEX contaminated soils until the results of confirmation soil samples were below MTCA Method A cleanup levels. Approximately 280 cubic yards of petroleum contaminated soil was excavated and disposed of off-site. These excavations were conducted south and east of Warehouse 3 and beneath the southeast corner of Warehouse 3. Following the soil cleanup, quarterly groundwater monitoring was conducted in all six monitoring wells (MW-1 through MW-6) from 2000 through 2001 until four consecutive rounds of groundwater monitoring results were below MTCA Method A cleanup levels.

Based on the independent cleanup report and four rounds of quarterly groundwater monitoring results, Ecology issued a no further action (NFA) letter on July 2, 2001. The NFA letter stated that the release of TPH and BTEX into both soil and groundwater no longer poses a threat to human health and the environment. A copy of the NFA letter is included as Enclosure-B.

As a part of property transaction, a Phase I and Phase II Environmental Site Assessment (ESA) was performed in 2004. The Phase II ESA included the drilling of five direct push borings and collection of groundwater samples including the existing six monitoring wells. Groundwater samples collected from three borings and two monitoring wells had vinyl chloride concentrations above MTCA Method A cleanup level of 0.2 µg/l.

In May 2006, a total of five geoprobe borings were drilled to further characterize the vertical and horizontal extent of vinyl chloride in soil and groundwater.

A total of ten soil samples and five groundwater samples were collected and analyzed for volatile organic compounds (VOCs) and total metals (arsenic and lead) in shallow soil samples, since the Site was located within the Tacoma Smelter Plume. No vinyl chloride was detected in any of the soil samples and few VOCs were detected in some of the soil samples either below the MTCA cleanup levels or below the laboratory detection limits. However, vinyl chloride was detected in groundwater samples above the MTCA Method A cleanup level of 0.2 µg/l. Only lead was detected in shallow soil samples collected at two boring locations at concentrations up to 10 mg/kg and no arsenic was detected in any of the shallow soil samples. The above detected lead concentration was below the MTCA Method A soil cleanup level of 250 mg/kg.

Based on the above information, a "Partial Sufficiency and Further Action Determination Letter" was issued by Ecology on August 16, 2006. This letter stated that no remedial actions are needed for vinyl chloride in soils; however, the letter required long term groundwater monitoring for vinyl chloride. A Restrictive Covenant was recorded on the property on April 30, 2007 restricting the groundwater use at the Site. Copies of the Partial Sufficiency and Further Action letter and Restrictive Covenant are included as Enclosure C and Enclosure D, respectively.

Four rounds of quarterly groundwater monitoring were conducted from March 2007 through spring of 2008. Vinyl chloride was detected in monitoring wells MW-4 and MW-5 at concentrations up to 2 µg/l. These concentrations exceeded MTCA Method A cleanup level of 0.2 µg/l, but were below MTCA Method B surface water cleanup level of 3.7 µg/l. The groundwater monitoring was terminated after the fourth sampling event in 2008.

Latest Groundwater Monitoring

In 2015, as a result of the periodic review of the Site, the Gig Harbor Historical Museum restarted the quarterly groundwater monitoring with the intention of obtaining a no further action determination letter for the groundwater portion of the Site. A total of eight rounds of quarterly groundwater monitoring were conducted in monitoring wells MW-4, MW-5 (in which vinyl chloride was detected previously) and MW-7 (conditional point compliance) from July 2015 through January 2017. During the first three rounds of quarterly groundwater monitoring, the range of vinyl chloride detected in MW-4 was 0.22 µg/l to 0.35 µg/l and vinyl chloride was not detected in MW-5 and MW-7. However, the vinyl chloride concentrations during the last five consecutive rounds of quarterly groundwater monitoring (January 2016 through January 2017) were all either below the laboratory detection limit or MTCA Method A cleanup level of 0.2 µg/l in all three wells.

Based on the above information provided to Ecology, the Site requires no additional groundwater cleanup or monitoring for vinyl chloride. All the groundwater monitoring results and the monitoring well locations are included as Enclosure E.

2. Establishment of Cleanup Standards

Ecology has determined the cleanup levels and points of compliance you established for the Site have met the substantive requirements of MTCA.

The MTCA Method A cleanup levels for unrestricted uses for the groundwater were used to characterize and determine compliance for the Site.

Standard points of compliance was used for the Site. The point of compliance for the groundwater was established throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth that could potentially be affected by the Site. The groundwater monitoring wells located within and along the edge of the property boundary should be adequate as points of compliance. The vinyl chloride concentrations in these wells will need to be below the MTCA method A cleanup levels.

3. Selection of Cleanup Action

Ecology has determined the cleanup actions you selected for the Site meets the substantive requirements of MTCA.

The selected cleanup action for the Site which included the following:

- Excavation of contaminated soils and on-site treatment and/or off-site disposal.
- Institutional Controls restricting the groundwater use at the Site.
- Long Term Groundwater Monitoring.

4. Cleanup

Ecology has determined the cleanup you performed has met the cleanup standards at the Site. The cleanup activities conducted so far at the Site included:

Total Petroleum Hydrocarbons Cleanup

In 1991 and 1992, as a part of the soil cleanup, an unknown quantity of TPH contaminated soils were excavated, treated on-site by thermal desorption (1991) and disposed of off-site (1992).

However, some contaminated soil was left in-place. In 2000, following the additional investigation, over excavation was conducted to remove the remaining TPH and BTEX contaminated soils to below MTCA Method A cleanup levels. This remedial action included the excavation and disposal of approximately 280 cubic yards of petroleum contaminated soil. Following the soil cleanup, four rounds of groundwater monitoring was conducted in six monitoring wells. Results of all contaminants of concern (TPH and BTEX) were either below MTCA Method A cleanup levels or below the laboratory detection limits. As a result, Ecology issued a "no further action" letter on July 2, 2001 for TPH and BTEX in both soil and groundwater (Enclosure B).

Vinyl Chloride

In 2004, a limited groundwater investigation conducted as a part of property transaction. This investigation revealed the presence of vinyl chloride in groundwater at the Site. A follow-up soil and groundwater investigation was conducted in May 2006 to define the extent of vinyl chloride. The soil sample results did not show the presence of vinyl chloride or any other chlorinated solvents. However, vinyl chloride was detected in the groundwater exceeding the MTCA Method A cleanup level of 0.2 µg/l. On August 16, 2006, Ecology issued a "Partial Sufficiency and Further Action (Enclosure C)" opinion letter for meeting the cleanup standards for vinyl chloride in soils. The letter required the development and implementation of a long term groundwater monitoring plan. A Restrictive Covenant was recorded on the property on April 30, 2007 (Enclosure D). In early 2007, a groundwater monitoring plan was developed and implemented after Ecology's review. The vinyl chloride concentrations during four rounds of quarterly monitoring ranged from 0.28 µg/l to 2 µg/l. These concentrations exceeded MTCA Method A cleanup level of 0.2 µg/l. However, the groundwater monitoring was terminated following the fourth sampling event in 2008.

The Gig Harbor Historical Museum restarted the groundwater monitoring in 2015 and a total of eight rounds of quarterly groundwater monitoring was conducted from July 2015 through January 2017. During these events groundwater samples were collected from three monitoring wells (MW-4, MW-5 and MW-7) and samples were analyzed for VOCs. The results of vinyl chloride during the last five consecutive rounds of quarterly monitoring (January 2016 through January 2017) were all below the laboratory detection limits/below MTCA Method A cleanup level of 0.2 µg/l. As a result, no additional groundwater cleanup or monitoring is required at this Site. Groundwater monitoring results and well locations are included as Enclosure-E.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.

The process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

Limitations of the Opinion

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 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 performed is substantially equivalent. Courts make that determination. See RCW 70.105D.080 and WAC 173-340-545.

3. **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 cleaning up the Site under the Voluntary Cleanup Program (VCP). As your cleanup progresses, 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/program/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me at (360) 407-6335 or by e-mail at panjini.balaraju@ecy.wa.gov.

Sincerely,

Panjini Balaraju, P.E.
Periodic Review Coordinator
Southwest Regional Office
Toxics Cleanup Program

Enclosures: A – Description and Diagrams of the Site
B – No Further Action Letter dated July 2, 2001
C – Partial Sufficiency and Further Action Letter dated August 16, 2006.
D – Restrictive Covenant
E – Groundwater Monitoring Well Locations and Laboratory Results (January 2015 through January 2017).

By certified mail: [91 7199 9991 7037 0287 2028]

cc: Mirna Fritz, Gig Harbor History Museum
Rick Fuller
Nick Acklam, Ecology
Central Files

ENCLOSURE - A

Description and Diagrams of the Site

Site Description

The Gig Harbor Peninsula Historical Society property is approximately 2-acres and is located at 4021 and 4121 Harborview Drive, Gig Harbor, Washington, Pierce County. This is Township 21 North, Range 2 West, and the NW ¼ of the NE ¼ of Section 6, Willamette Meridian. The property is located east of the intersection between Harborview Drive, Harborview Drive North, and Burnham Drive within the city of Gig Harbor limits and zoned as Commercial District. This includes five parcels, 0221064001, 0221064054, 0221064069, 0221064118, and 0221064001. Figure 1 and Figure 2 shows the general location of the Site and Site Plan, respectively. The waters and shoreline of Gig Harbor are immediately to the east of the property. The terrain is relatively level and slopes downward to east-southeast, towards the Gig Harbor. The majority of the property is asphalt paved. Donkey Creek is confined to a culvert that traverses the property and empties into Gig Harbor. There are eight monitoring wells within the property.

The adjacent land use north of the subject property consists of predominantly residential area. A boat marina, small shops and restaurants are located further north, along Harborview Drive North. The Gig Harbor wastewater treatment plant is located northwest of Harborview Drive, Harborview Drive North, and Burnham Drive intersection. The Gig Harbor Historical Society Museum is located further north, beyond the wastewater treatment plant. The land use immediately south of the property consists of a small retail shop, and auto repair garage and the Gig Harbor 76 gasoline service station.

The property is located in an area of rolling terrain with an elevation of approximately 10 to 15 feet above sea level. Soils in this area are described as Xerorthents, fill areas. This unit consists of smothered areas filled with earth, trash or both. The site is underlain by silty sand, and sand with some gravel (fill) to a depth of approximately 10 feet below ground surface (bgs). The approximate depth to groundwater is four to ten feet bgs. The tidal study data conducted in April 2006 indicate that the groundwater flow direction is generally to the south with a hydraulic gradient of approximately 0.02 foot per foot. This information indicates that groundwater locally flows to the south in the area of the monitoring wells, but ultimately discharges to the east, to the Gig Harbor. The data also show that the shallow groundwater flow at the Gig Harbor Peninsula Historical Society and Museum Site may be locally influenced by recharge from Donkey Creek leaking culverts, which is located north of Warehouse 2.

Site History and Cleanup

Historically, the property was a tideland until filled with imported material in 1910. It was used for timber storage until 1925. Peninsula Light Company (PLC) occupied the property from 1925 until 1986. The PLC first developed the property with Warehouse 1 and an office building formerly located east of Harborview Drive North. The PLC used Warehouse 1 as utility vehicle maintenance and repair garage. During the early 1960s, PLC constructed Warehouse 2, a new office building and demolished the old office building. During the late 1960s, PLC demolished the original office building and constructed Warehouse 3. The PLC used the northern portion of Warehouse 3 for storing electrical transformers, the middle portion was used for company vehicle garage, and the southern portion was used for storing office supplies. According to a historic site plan, a gas pump was located on the northwest corner of Warehouse 1. The gas pump was associated with two underground storage tanks (USTs) located north of Warehouse 1. These USTs probably contained diesel fuel and gasoline. Subsequently, after Warehouse 3 was constructed, the USTs and the gas pump were relocated to the northeast, south of the Warehouse 3. Since the late 1980s USTs were not in use and in 1991 USTs were removed. The Gig Harbor Historical Society purchased 2-acre property. The existing Warehouse 1 was proposed to be used as warehouse storage, Warehouse 2 was proposed to be a museum, an administration office and a cafe. Figure 3 shows the location of the Site structures.

Two underground storage tanks (USTs) containing leaded gasoline and diesel were formerly present at the Site. These USTs were in use until late 1980s and were removed in 1991. A limited soil and groundwater investigation conducted in 1990 and 1991 revealed the presence of total petroleum hydrocarbons (TPH) including benzene, toluene, ethylbenzene, and xylenes contamination above the Model Toxics Control Act (MTCA) cleanup levels in both soil and groundwater. An unknown quantity of TPH contaminated soils were excavated in the vicinity of Warehouse 1 and disposed of off-site.

In 1992, additional soil and groundwater investigations were conducted north of Warehouse 1 and south of Warehouse 3. Results of this investigation showed that soils located immediately south and southeast of Warehouse 3 were impacted with TPH gasoline (TPH-G) and BTEX constituents. The TPH-G and BTEX contaminated soils were excavated, treated on-site by thermal desorption process and removed off-site. Also six groundwater monitoring wells (MW-1 through MW-6) were installed) and quarterly groundwater monitoring was conducted from 1993 through 1997. The TPH-G and BTEX concentrations were consistently exceeded MTCA Method A cleanup levels in monitoring wells MW-1, MW-2, and MW-3.

In 1992, Saltbush Environmental performed additional limited soil and groundwater investigation followed by over-excavating approximately 280 cubic yards of TPH-G and BTEX contaminated soils to below MTCA Method A cleanup levels. In addition, quarterly groundwater monitoring was conducted from 2000 through 2001. Based on the cleanup report and four rounds of clean groundwater monitoring results, Ecology issued a no further action letter in July 2001 for TPH-G and BTEX in both soils and groundwater (Enclosure B).

In November 2004, a limited Phase II Environmental Site Assessment was conducted as part of a property transaction. Only vinyl chloride was detected in groundwater exceeding MTCA Method A cleanup level. A follow-up soil and groundwater investigation was conducted in May 2006 to better define the vertical and horizontal extent of vinyl chloride. In addition, shallow soil samples were also collected for arsenic and lead analysis, since the site is located within the Tacoma Smelter Plume. Vinyl chloride was not detected in any of the soil samples; however, vinyl chloride was detected in groundwater above the MTCA Method A cleanup levels. Only lead was detected at 10 mg/kg in two shallow soil samples and arsenic was not detected in any of the soil samples. Ecology issued a "Partial Sufficiency and Further Action (Enclosure C)" letter in August 2006 requiring the implementation of long term groundwater monitoring. After developing a groundwater monitoring work plan, quarterly groundwater monitoring was implemented at the Site. Four rounds of quarterly monitoring was conducted from early 2006 through spring of 2007. The results of groundwater samples showed that the vinyl chloride concentrations were above MTCA Method A cleanup level of 0.2 µg/l in monitoring wells MW-4 and MW-5. The groundwater monitoring was discontinued after the fourth round of groundwater sampling event.

The groundwater monitoring was again restarted in 2015 and a total of eight rounds of quarterly groundwater monitoring was conducted from July 2015 through January 2017. During these events groundwater samples were collected from three monitoring wells (MW-4, MW-5 and MW-7) and samples were analyzed for VOCs. The results of vinyl chloride during the last five consecutive rounds of quarterly monitoring (January 2016 through January 2017) were all below the laboratory detection limits/below MTCA Method A cleanup level. As a result, no additional groundwater cleanup or monitoring is required at this Site.

ENCLOSURE - B

No Further Action Letter dated July 2, 2001

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

July 2, 2001

Final NFA Letter

Ms. Diana Halar
Peninsula Light Company
13315 Goodnough Dr. NW
P.O. Box 78
Gig Harbor, WA 98335-0078

Dear Ms. Halar:

Thank you for submitting the results of your independent remedial action for review by the Washington State Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the soils remediation activities at the former Peninsula Light Company Headquarters site, located at 4121 (4021?) Harborview Drive, Gig Harbor, Washington 98332:

- Pacific Testing Laboratories, **Final Report, Soils Remediation Activities: Former Peninsula Light Storage Yard, Gig Harbor, Washington,** October 29, 1992,
- Pacific Testing Laboratories, **Gauging, Sampling, and Analysis of Groundwater Monitoring Wells, 4021 Harborview Drive, Gig Harbor, Washington,** May 22, 1997,
- Saltbush Environmental Services, Inc., **Environmental Assessment (Limited Soil & Ground Water Sampling and Testing), The Former PLC Headquarters Property Project, 4121 Harborview Drive N.W., Gig Harbor, Washington 98335,** June 27, 2000,
- Saltbush Environmental Services, Inc., **Contamination Delineation Study, Interior of Means Ornamental Concrete Building,** August 15, 2000,
- Saltbush Environmental Services, Inc., **Independent Cleanup Report, The Former Peninsula Light Company Headquarters, 4121 Harborview Drive N.W., Gig Harbor, Washington 98335,** October 10, 2000,
- Saltbush Environmental Services, Inc., **Quarterly Ground Water Monitoring Report, The Former Peninsula Light Company Headquarters, 4121 Harborview Drive N.W., Gig Harbor, Washington 98335,** January 12, 2001,

- Saltbush Environmental Services, Inc., **Quarterly Ground Water Monitoring Report, The Former Peninsula Light Company Headquarters, 4121 Harborview Drive N.W., Gig Harbor, Washington 98335,** June 26, 2001.

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

Based upon the above listed information and the ground water monitoring results, it would appear that, at this time, the release of total petroleum hydrocarbons (TPH) and BTEX into both the soil and ground water no longer poses a threat to human health or the environment. Therefore, Ecology is issuing this determination that no further remedial action is necessary at this site, under MTCA, Chapter 70.105D RCW. However, please note that because your actions were not conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(i) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

Ecology's no further action determination is made only with respect to the releases to the soil and the ground water identified in the reports listed above, and applies only to the area of the property affected by the releases at the former Peninsula Light Company headquarters site, located at 4121 (4021?) Harborview Drive NW, Gig Harbor, Washington as identified in the reports. It does not apply to any other release or potential release at the property, any other areas on the property, nor any other properties owned or operated by Peninsula Light Company.

Ecology will update its databases to reflect this "No Further Action" determination.

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 determination.

If you have any questions about any of the information presented in this letter, please contact me at (360) 407-6267.

Sincerely,

Charles S. Cline
Toxics Cleanup Program
Southwest Regional Office

CC:dj

cc: John F. Hildenbrand, Saltbush Environmental Services, Inc.
Mark LaVergne, Tacoma-Pierce County Health Department
Carol Johnston, State of Washington Department of Ecology, SWRO-TCP

ENCLOSURE - C

Partial Sufficiency and Further Action Letter dated August 16, 2006

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

CERTIFIED MAIL

August 16, 2006

Ms. Anastasia Speransky
Kleinfelder, Inc.
2405-140th Avenue NE, #A-101
Bellevue, WA 98005

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

- Name: Gig Harbor Peninsula Historical Society Site (former Peninsula Light Company Headquarters)
- Address: 4021 and 4121 Harborview Drive, Gig Harbor
- Facility/Site No.: 88123954
- VCP No.: SW0634

Dear Ms. Speransky:

Thank you for submitting your independent remedial action report for the Gig Harbor Peninsula Historical Society 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. Kleinfelder, Inc., **Phase I and Limited Phase II Environmental Site Assessment, Proposed Gig Harbor Historical Society Site, 4021 and 4121 Harborview Drive, Gig Harbor, Washington,** December 14, 2004.

2. Kleinfelder, Inc., **Environmental Work Plan, Gig Harbor Peninsula Historical Society Site, 4021 and 4121 Harborview Drive, Gig Harbor, Washington,** November 28, 2005.

3. Kleinfelder, Inc., **Supplemental Environmental Investigation at The Gig Harbor Peninsula Historical Society Site, 4021 and 4121 Harborview Drive, Gig Harbor, Washington,** July 14, 2006.

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

- Vinyl chloride Ground Water.

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 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 the following release(s):**

- Vinyl chloride in Soil and Ground Water.

However, the independent remedial action(s) performed at the Site are not sufficient to meet MTCA's substantive requirements for addressing the following release(s):

- Vinyl chloride in Ground Water.

Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at this Site under MTCA.

A limited Phase II study has detected vinyl chloride in the ground water. The extent of this contamination has been addressed and reported in ***Supplemental Environmental Investigation at the Gig Harbor Peninsula Historical Society Site, 4021 and 4121 Harborview Drive, Gig Harbor, Washington*** *dated July 14, 2006. The most stringent ground-water* ***cleanup level*** *applicable at this site would be the Method A cleanup level of 0.2 ug/l. This would be applicable at the standard point of compliance (at the water table throughout the property). However, the MTCA Method B cleanup level for surface water (3.69 ug/l) could be considered a* ***remediation level*** *and a* ***conditional point of compliance*** *would be established at the down-gradient boundary of the property. Presently, no ground-water concentration measured on the Site exceeds the surface-water standard. No source could be determined on the property for the vinyl chloride present in the ground water, although Warehouse I had operated as a garage and utility vehicle maintenance shop, possibly from 1925 to the mid-1980s. As long as the ground water meets the 0.2 ug/l cleanup level at the conditional point of compliance (the property boundary), the cleanup action may be determined to* ***comply with cleanup standards*** *(as long as a restrictive covenant has been placed on the site that prevents the consumption of ground water). If the vinyl chloride concentrations are reduced below the Method A cleanup level throughout the property at the standard point of compliance, the restrictive covenant can be removed.*

- *It will be necessary to develop a monitoring plan and establish conditional points of compliance (wells at the property boundary, adjacent to where the ground water enters Gig Harbor). The compliance monitoring is part of the institutional controls (restrictive covenant) that would be required because of the conditional point of compliance and will be required until residual hazardous substance concentrations no longer exceed site cleanup levels. [WAC 173-340-410] If concentrations of hazardous substances do not exceed the cleanup level at a standard point of compliance, no further action is necessary." [WAC 173-340-350(8)]*

- *A no-further-action (NFA) can be issued once a restrictive covenant is received that addresses the ground-water contamination (all cleanup has been completed except for the ground-water monitoring, which is considered a passive activity). A restrictive covenant can be filed if monitoring demonstrates that any contamination present is not leaving the legal property boundary (and, of course, ground water is not being consumed on the property). If contamination is present and is leaving the property, active remediation could be required. Monitoring wells would need to be placed at the down-gradient property boundaries to establish conditional points of compliance. Monitoring frequency could be reduced and eventually the restrictive covenant could be removed if concentrations decreased below cleanup levels throughout the site. WAC 173-340-440 requires that: "The covenant shall be executed by the property owner and recorded with the register of deeds for the county in which the site is located. This restrictive covenant shall run with the land, and be binding on the owner's successors and assigns." Prior to a restrictive covenant being established under this chapter, the person conducting the independent cleanup shall notify and seek comment from a city or county department with land use planning authority for real property subject to the restrictive covenant. Once a restrictive covenant has been executed, Ecology shall be notified and sent a copy of the restrictive covenant. This restrictive covenant includes limitations on usage of the site and will maintain institutional control of this site to prevent the use of ground water for potable purposes and to limit the offsite movement of contamination.*

- *All sampling data generated after October 1, 2005 should be submitted to Ecology according to the requirements of WAC 173-340-840(5), in printed form and in electronic form capable of being transferred into the Department's data management system. Electronic data submittal requirements are provided at http://www.ecy.wa.gov/eim/. If you should have any questions about the data submittal requirements, please contact Ms. Chris Neumiller at (360) 407-6258.*

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 conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (360) 407-6267.

Sincerely,

Charles S. Cline
SWRO Toxics Cleanup Program

CSC/ksc:GigHarborHistorical Society Partial Sufficiency FA

Enclosures: Enclosure A – text + Figure 1 (general site location)
Figure 2 (geoprobe & well locations)
Figure 3 (tidal fluctuations)
Figures 4a through 4d (well water elevations)
Enclosure B – Opinion Letters dated May 6, 2005 & February 14, 2006

Cc: Ms. Jennifer Kilmer, Gig Harbor Peninsula Historical Society and Museum
Ms. Kristin Riebli, City of Gig Harbor
Mr. Brad D. Harp, Tacoma-Pierce County Health Dept.
Mr. Bob Warren, Department of Ecology

ENCLOSURE A

The Gig Harbor Peninsula Historical Society property is approximately two acres, located at 4021 and 4121 Harborview Drive, Gig Harbor, Pierce County. This is Township 21 North, Range 2 West, and the NW ¼ of the NE ¼ of Section 6, Willamette Meridian. This is also described as latitude N47 ° 20 '16.4 "and longitude W122 ° 35' 40.9". The subject property is located east of the intersection between Harborview Drive, Harborview Drive North, and Burnham Drive within the City of Gig Harbor City limits and is zoned Commercial District (C-1) (see Figure 1). This includes five site parcels noted as: 0221064001, 0221064054, 0221064069, 0221064118, and 0221064137. The waters and shoreline of Gig Harbor are immediately to the east of the subject property. The terrain is relatively level and slopes downward to east-southeast, towards Gig Harbor. Three slab-on-grade warehouse/showroom retail buildings and one retail building built on piling reside within the boundaries of the property. Warehouse 1 is the Gig Harbor Doors and More showroom retail. Warehouse 2 is the Beach Basket nursery and gardening retail. Warehouse 3 is the Means Ornament Concrete showroom retail. A retail building houses the Ship to Shore marine retail and Pandora's Antiques and Collectibles Store. The majority of the property is asphalt-paved. Donkey Creek is confined to a culvert that traverses the property and empties into Gig Harbor. Six monitoring wells are located on parcels "4-001" and "4-069" and one monitoring well (L-19) is located on parcel "4-054" (this last monitoring well is associated with the former Conans, present Gig Harbor 76 service station), south of the Retail Building (See Figures 2 and 3).

The adjacent land use north of the subject property consists of predominantly residential area. A boat marina, small shops and restaurants are located further north, along Harborview Drive North. The Gig Harbor wastewater treatment plant is located northwest of Harborview Drive, Harborview Drive North, and Burnham Drive intersection. The Gig Harbor Historical Society Museum is located further north, beyond the wastewater treatment plant. The land use immediately south of the property consists of a small retail shop, and auto repair garage and the Gig Harbor 76 gasoline service station (previously known as Conan's service station or Conan Unocal). Small shops and restaurants are located further south across Harborview Drive. Gig Harbor is immediately east of the property. In addition, an undeveloped land area is located east of the southern portion of parcel "4-118". Harborview Drive North borders the property to the west. Donkey Creek Park is located across Harborview Drive North, west of the property.

Historically, the subject property was a tideland until filled with imported material in 1910. It was used for timber storage until 1925. Peninsula Light Company occupied the property from 1925 until 1986. Peninsula Light Co. first developed the property with Warehouse 1 and an office building formerly located east of Harborview Drive North. Peninsula Light Co. used Warehouse 1 as a utility vehicle maintenance and repair garage. At the time of the first development, a portion of Donkey Creek was confined into culverts. During the early 1960s, Peninsula Light Co. constructed Warehouse 2, a new office building (current Retail Building) and demolished the old office building. During the late 1960s, Peninsula Light Co. demolished the original office building and constructed Warehouse 3. Peninsula Light Co. used the northern portion of Warehouse 3 for storing electrical transformers, the middle portion was used for company vehicles garage, and the southern portion was used for storing office supplies. According to a historic site plan, a gas pump was located on the northwest corner of Warehouse 1. The gas pump was, apparently, associated with two underground storage tanks (USTs) located north of Warehouse 1. These USTs probably contained diesel fuel and gasoline. Subsequently, after Warehouse 3 was constructed, the USTs and the gas pump were relocated to the northeast, south of Warehouse 3. From the late 1980s to present time, the property has not operated USTs and has been occupied by various retail and light commercial businesses including used car dealership and repair. The Gig Harbor Historical Society has purchased the 2-acre property and is not planning to demolish the existing on-site buildings or redevelop the property. Warehouse 1 is proposed to be warehouse storage. Warehouse 2 is proposed to be a museum, an administration office and a café. New construction may include the addition of a boat shed to house the 65-foot fishing vessel "Shenandoah" and exposing Donkey Creek.

Measurements recorded from the on-site ground-water monitoring wells indicated depth to ground water as being approximately 3 to 6 feet below ground surface (ft bgs). The ground-water depth and flow direction at this property is influenced by tidal patterns. However, the predominant direction of ground-water flow is to the east-southeast, towards Gig Harbor. Ground water at the subject property was impacted with petroleum hydrocarbons. However, the site underwent a cleanup and received a "no further action" (NFA) letter from Ecology (C. Cline, dated July 2, 2001). In addition, the former Unocal/Conans service station (currently Gig Harbor 76 service station) located at 4101 Harborview Drive, has impacted soil and ground water and is undergoing remediation through the Voluntary Cleanup Program (VCP).

In November 2004, a limited Phase II Environmental Site Assessment was

conducted by Kleinfelder, Inc. to 1) assess the potential presence of total petroleum hydrocarbons (TPH) as gasoline, diesel and heavy oil, volatile organic compounds (VOCs), and dissolved lead in the property's shallow ground water associated with the Gig Harbor 76 service station (former Conans site) located immediately south (upgradient) of the subject property and 2) assess the potential presence of TPH as gasoline, diesel and heavy oil, VOCs, dissolved lead, and polychlorinated biphenyls (PCBs) in the property's shallow ground water associated with former on-site activities including UST (now removed), electrical transformer storage, and vehicle repair/maintenance. Ground-water samples were collected from five geoprobe borings, and from monitoring well L-19 and the six monitoring wells previously installed on the property. Soil borings were drilled to depths of 8 to 12 ft bgs. Unconfined ground water was encountered at depths of 4 to 6.5 ft bgs during drilling. Ground-water samples were collected from each well and boring. Samples were submitted to ESN-NW in Bellevue for analysis. Tables 11 and 12 from the Phase I and Limited Phase II report show the results of the ground-water analyses. Only vinyl chloride was present above the Model Toxics Control Act (MTCA) Method A ground-water cleanup levels.

On April 28, 2006, a tidal survey was conducted to assess the predominant flow direction at the site and to help establish the conditional points of compliance. Prior to the tidal survey, Kleinfelder completed a vertical survey of six ground-water monitoring wells MW-1 through MW-6 (installed previously). Ten rounds of depth to ground water measurements were obtained (approximately every hour) starting from 0830 hr until 1830 hr (through high and low tidal episodes). On April 28, 2006, the tidal fluctuation was approximately 13.2 ft with a low tide of –1.4 ft at 12:00 hr and a high tide of 11.8 ft above mean sea level (MSL) at 18:30 hr. Very little tidal response was noted in the ground-water monitoring wells. Ground-water elevations in monitoring well MW-1 ranged from 14.31 to 14.51 ft above MSL (0.20 ft fluctuation), the maximum of any of the wells. The minimum corresponded with low tide period and the maximum corresponded with high tide period. The direction of ground-water flow was estimated at four time periods between low and high tide. The data indicate that the ground-water flow direction is generally to the south with a hydraulic gradient of approximately 0.02 ft per ft. This information indicates that ground water locally flows to the south in the area of the monitoring wells, but ultimately discharges to the east, to Gig Harbor. Shallow ground-water flow at the Gig Harbor Peninsula Historical Society and Museum site may be locally influenced by recharge from Donkey Creek leaking culverts, which is located north of Warehouse 2 (Figure 2).

On May 10, 2006, a total of five geoprobe borings (GP-6 through GP-10) were

advanced at the property to further characterize the vertical and horizontal extent of vinyl chloride in soil and ground water at the site. See Figure 2 for geoprobe and well locations. The soil borings were advanced using an Environmental Services Network – Northwest (ESN-NW) direct-push geoprobe drilling rig. Soil borings were drilled to depths of 8 to 12 ft bgs. Continuous soil samples were collected from each boring for lithologic analysis using a 2-inch diameter four-ft long soil sampler with a disposable acetate liner. A Kleinfelder geologist licensed by the State of Washington was present during drilling and soil sampling to observe and document soil conditions. On-site drilling activities revealed silty sand, silt, and sand, with occasional fine gravel (fill) to a depth of approximately 10 ft bgs. In addition, silt with organics; peat an decayed wood debris (fill) were encountered in geoprobe borings GP-9 and GP-10 at approximate depths of 6.5 and 10 ft bgs, respectively. Gray silty sand with some gravel (marine deposits) was encountered in geoprobe borings GP-9 and GP-10 below 10 ft bgs. Unconfined ground water was encountered at depths of 4.5 ft bgs on the western portion of the site and at depths of 10 ft bgs on the eastern portion of the site during drilling. Soil and ground-water samples were collected for chemical analysis from all geprobe borings. A total of ten soil samples and five ground-water samples were submitted to a State Certified Analytical Laboratory and analyzed for the following constituents:

- Total metals (arsenic and lead) by EPA 7000 Series Method – shallow soil samples only; and
- Volatile organic compounds (VOCs) by EPA Method 8260 – soil and ground-water samples.

Five soil samples were collected for arsenic and lead analysis from each boring at an approximate depth of six inches bgs (shallow soil) to determine possible impact from the Tacoma Smelter Plume (TSP). Five soil samples for VOC analysis were selected from each boring. Five ground-water samples were collected from each boring using a three-foot long stainless-steel well screen and a peristaltic pump. Soil samples for VOC analyses were collected directly from an acetate liner using a plastic syringe in accordance with EPA's soil sampling Method 5035A.

In November 2004, Kleinfelder, Inc. conducted a Limited Phase II ESA to evaluate the potential contamination persisting because of the adjacent Gig Harbor 76 service station site, and what may be present that was not characterized during the previous studies. Ground-water sampling indicated that vinyl chloride is present in the ground water exceeding the MTCA Method A .2 ug/l ground-water cleanup standard. However, vinyl chloride concentrations did not exceed the surface-water cleanup

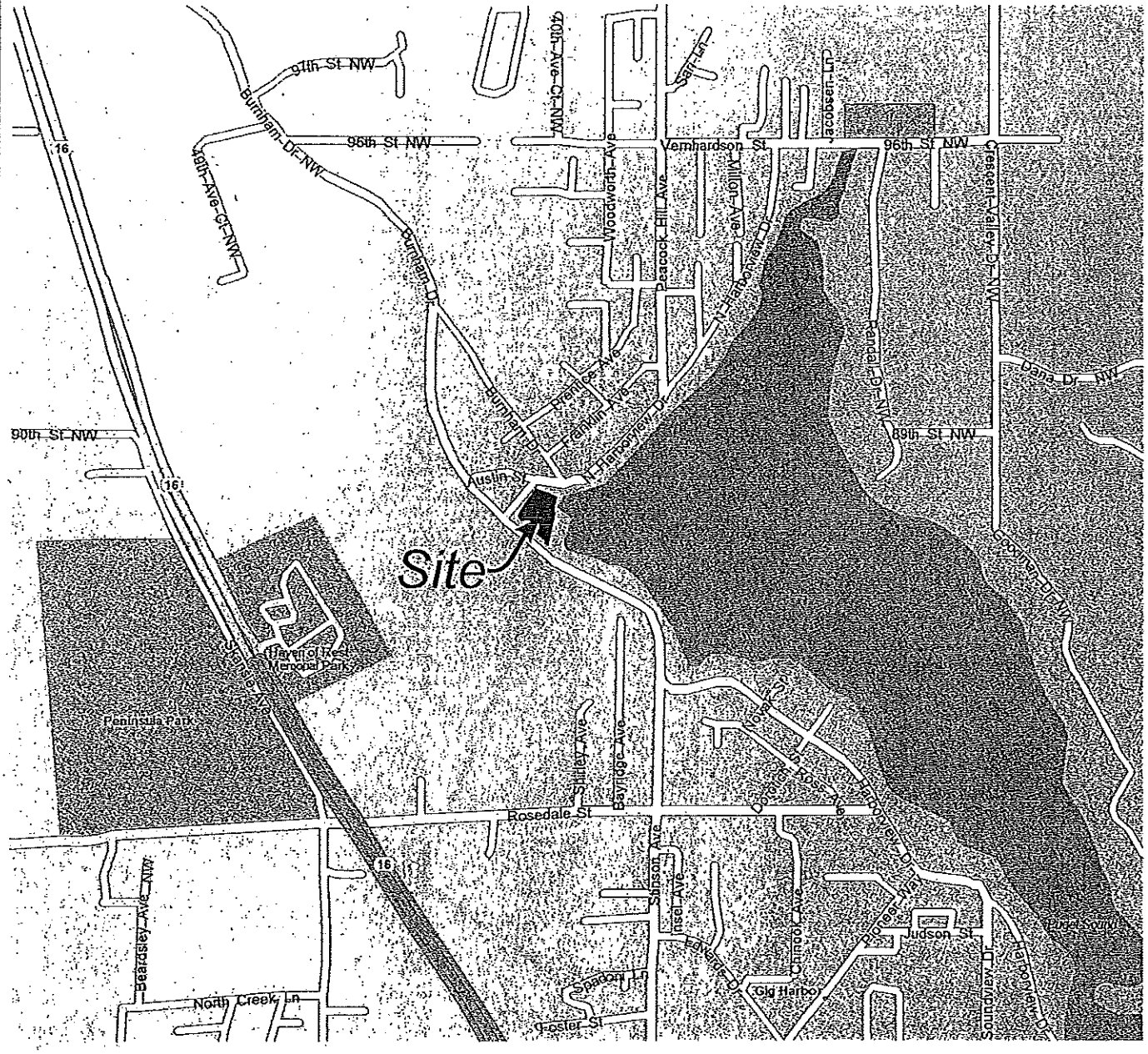
level of 3.69 ug/l. Other constituents, including PCBs, TPH, BTEX, dissolved lead and other VOCs do not appear to be present above Method A levels in the ground water.

On May 10, 2006, the five geoprobe boreholes determined that arsenic and lead were not present in the shallow soils above Method A soil cleanup levels. Only lead was detected in boreholes GP-8 and GP-9, at concentrations of 9 and 10 mg/kg, respectively. This was well below the MTCA Method A soil cleanup level of 250 mg/kg.

Soil samples were collected on May 10, 2006 at the ground-water table from geoprobe borings GP-6 through GP-10. No vinyl chloride at concentrations, above the laboratory method detection limits, was reported in the soil samples collected from the geoprobe borings. No VOC concentrations, above the laboratory method detection limits, were reported in soil samples collected from the geoprobe borings GP-6, GP-7, GP-9, and GP-10. Ethylbenzene and total xylenes were reported at concentrations below the MTCA Method A cleanup levels in the soil sample collected from geoprobe boring GP-8. In addition, residual concentrations of n-propylbenzene, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, sec-butylbenzene, isopropyltoluene, n-butylbenzene, and naphthalene were reported in the soil sample collected from geoprobe boring GP-8. The soil sample analytical results are shown in Table 2.

No vinyl chloride at concentrations above the MTCA Method A cleanup level for ground water (0.2 ug/l) was reported in ground-water samples collected from the geoprobe boreholes. No VOCs at concentrations above the laboratory method detection limits were reported in the ground-water samples collected from geoprobe borings GP-7, GP-9, and GP-10. Ethylbenzene and total xylenes were reported in the ground-water samples collected from geoprobe borings GP-6 and GP-8 at concentrations below the MTCA Method A ground-water cleanup levels. In addition, residual concentrations of n-propylbenzene, isopropylbenzene, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, and isopropyltoluene, were reported in the ground-water sample collected from geoprobe boring GP-8. Acetone was detected at a concentration just above the method reporting limit of 10 ug/l in the ground-water sample collected from geoprobe boring GP-6. However, acetone, at a concentration of 29 ug/l, was also reported present in the laboratory method blank. The ground-water sample analytical results for VOCs are shown in Table 3.

NOTE: This opinion letter constitutes a new form letter under which Ecology will issue technical consultation and advice pursuant to WAC 173-340-515. This opinion letter changes certain terminology to more closely reflect MTCA and its implementing regulations. This opinion letter takes the place of, and is functionally equivalent to, the "interim" or "conditional" No Further Action (NFA) letters issued by Ecology in the past.



N

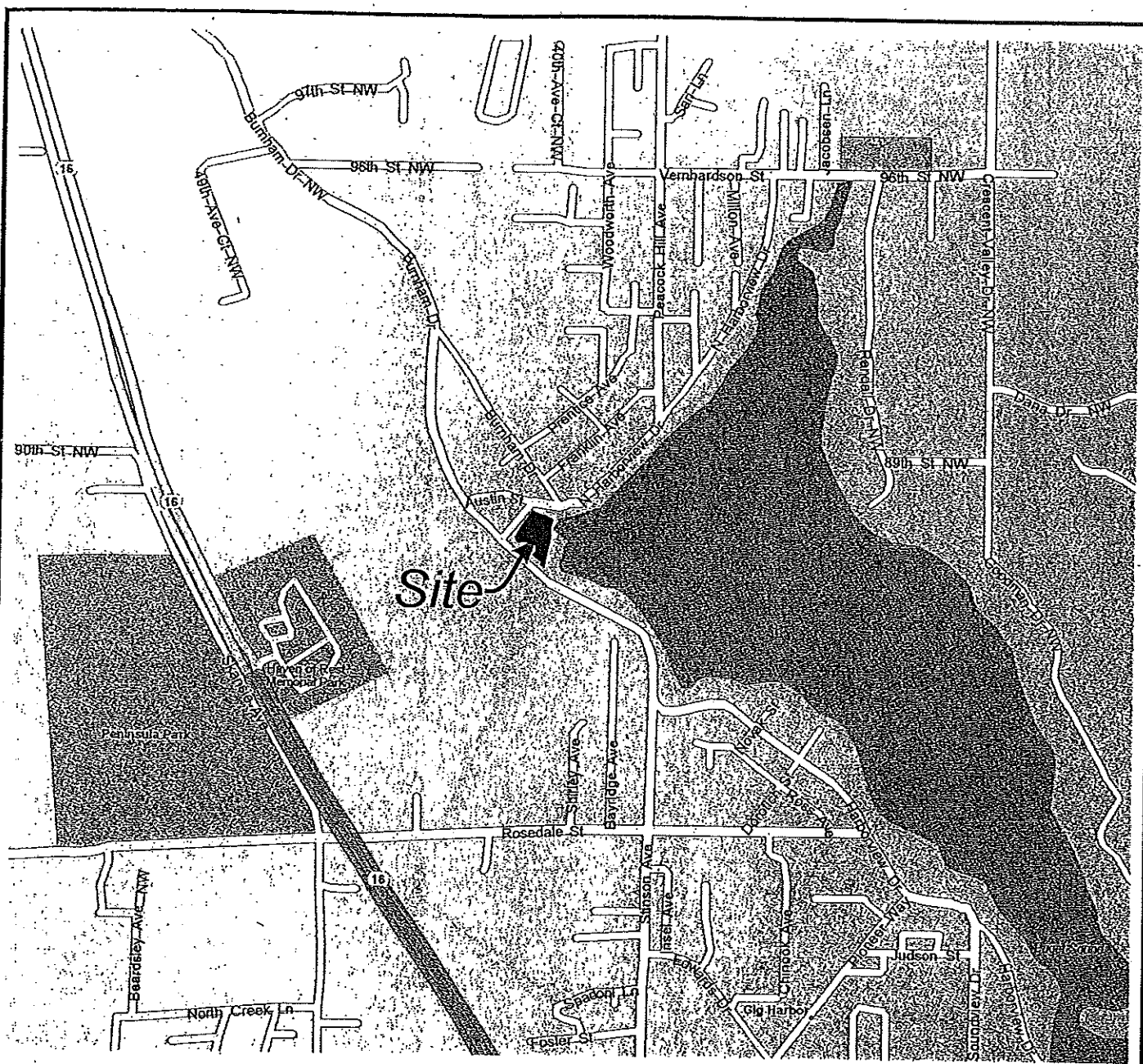
Not to Scale

KLEINFELDER

PROJECT NO. 49567.5 May 2006

Vicinity Map
Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

FIGURE
1



N

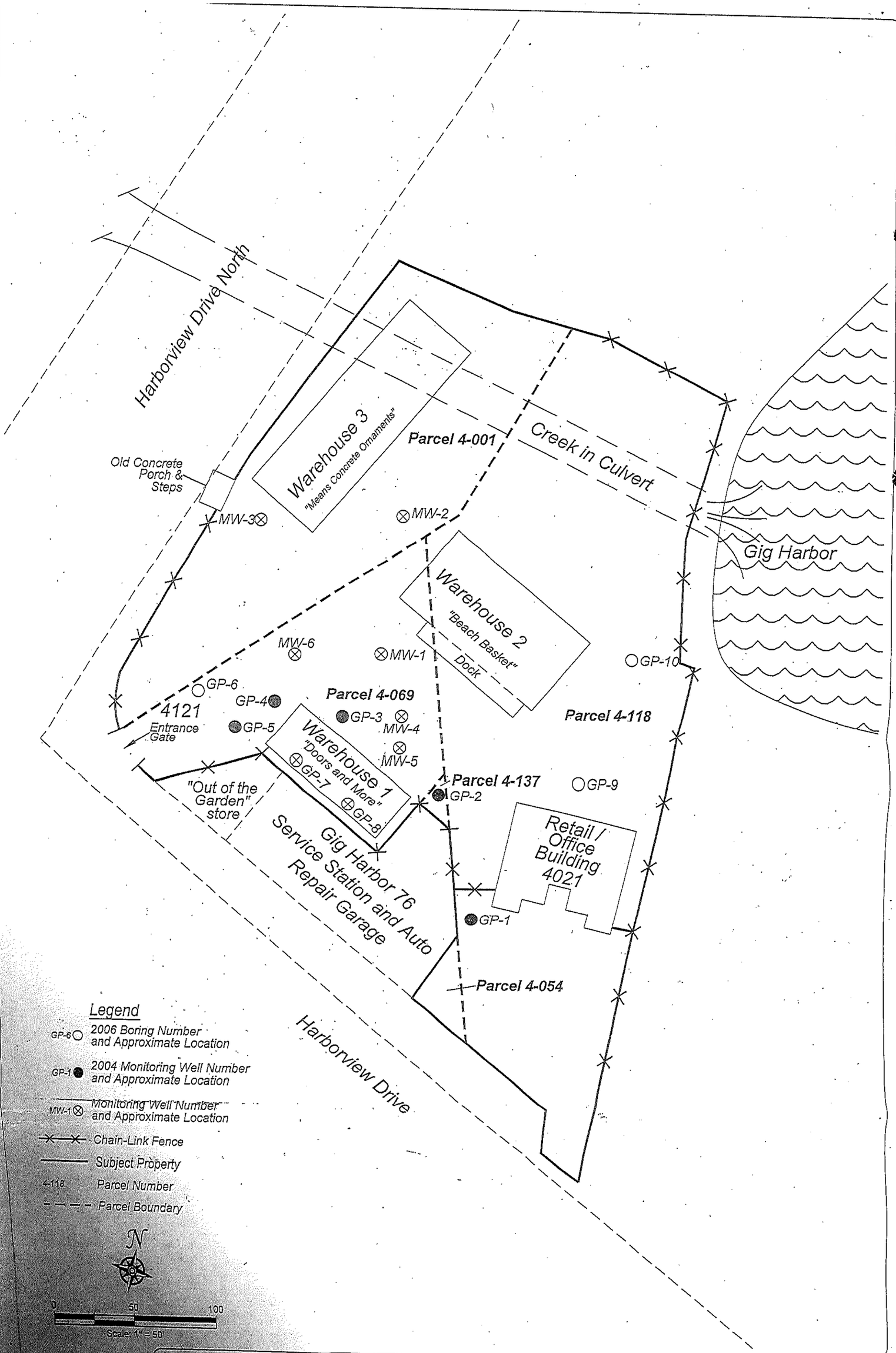
Not to Scale

KLEINFELDER

PROJECT NO. 49567.5 May 2006

Vicinity Map
Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

FIGURE 1



KLEINFELDER

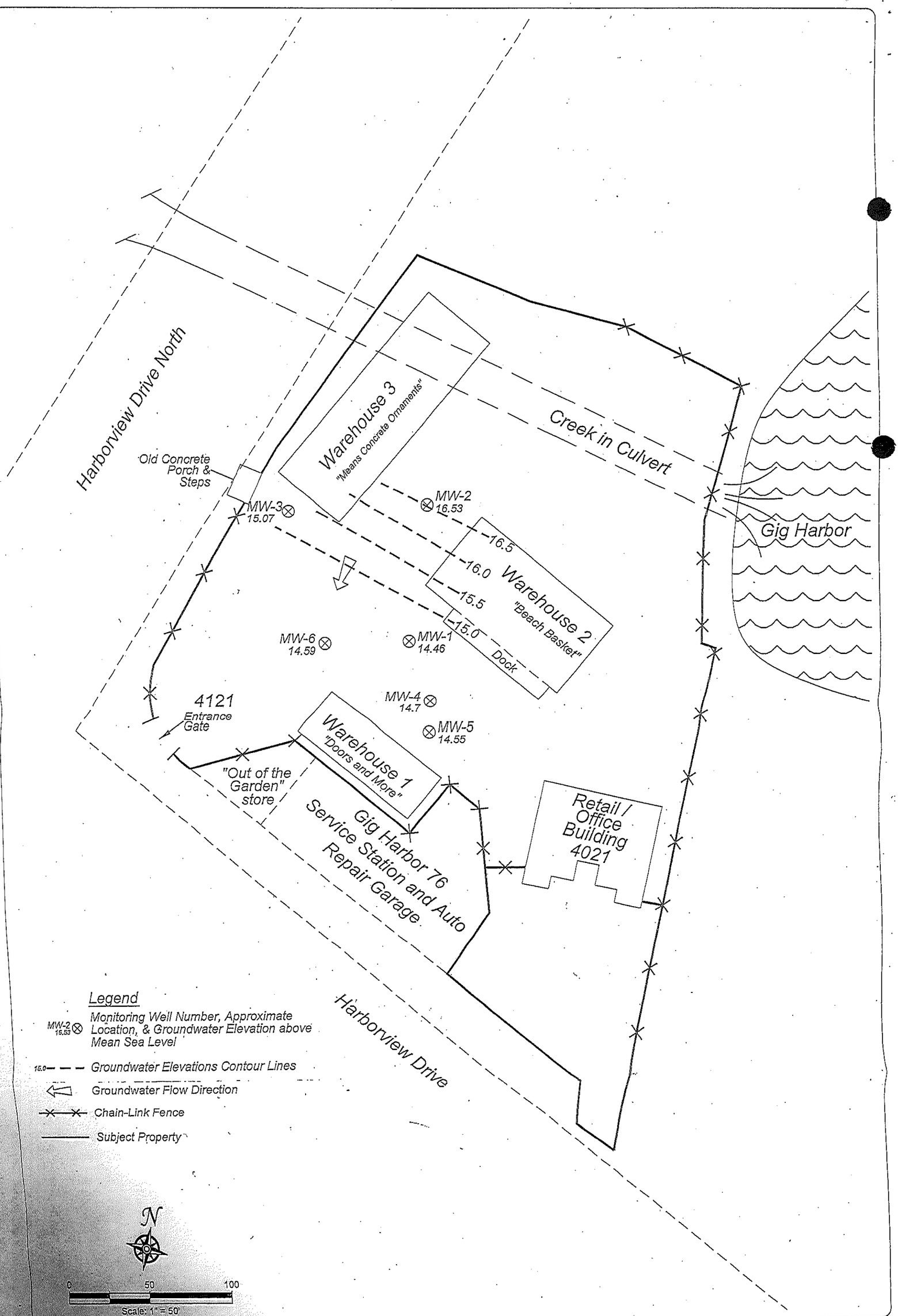
Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

Project: 49567.5

July 2006

Geoprobe Sampling Locations

FIGURE
2



KLEINFELDER

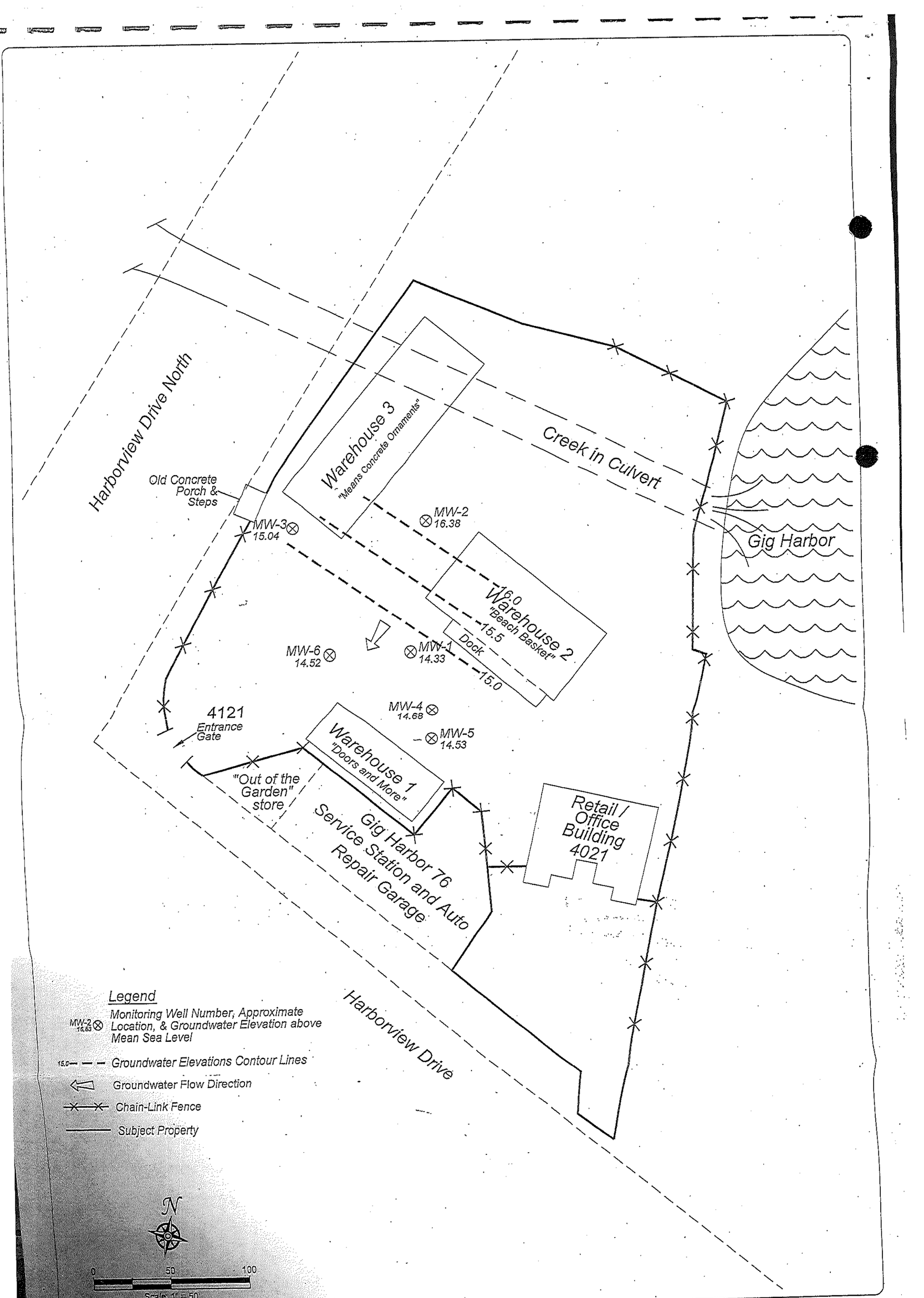
Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

Project: 49567.5

May 2006

Groundwater Elevations
and Flow Direction
at 8:30am (between High & Low Tide)

FIGURE
4a



KLEINFELDER

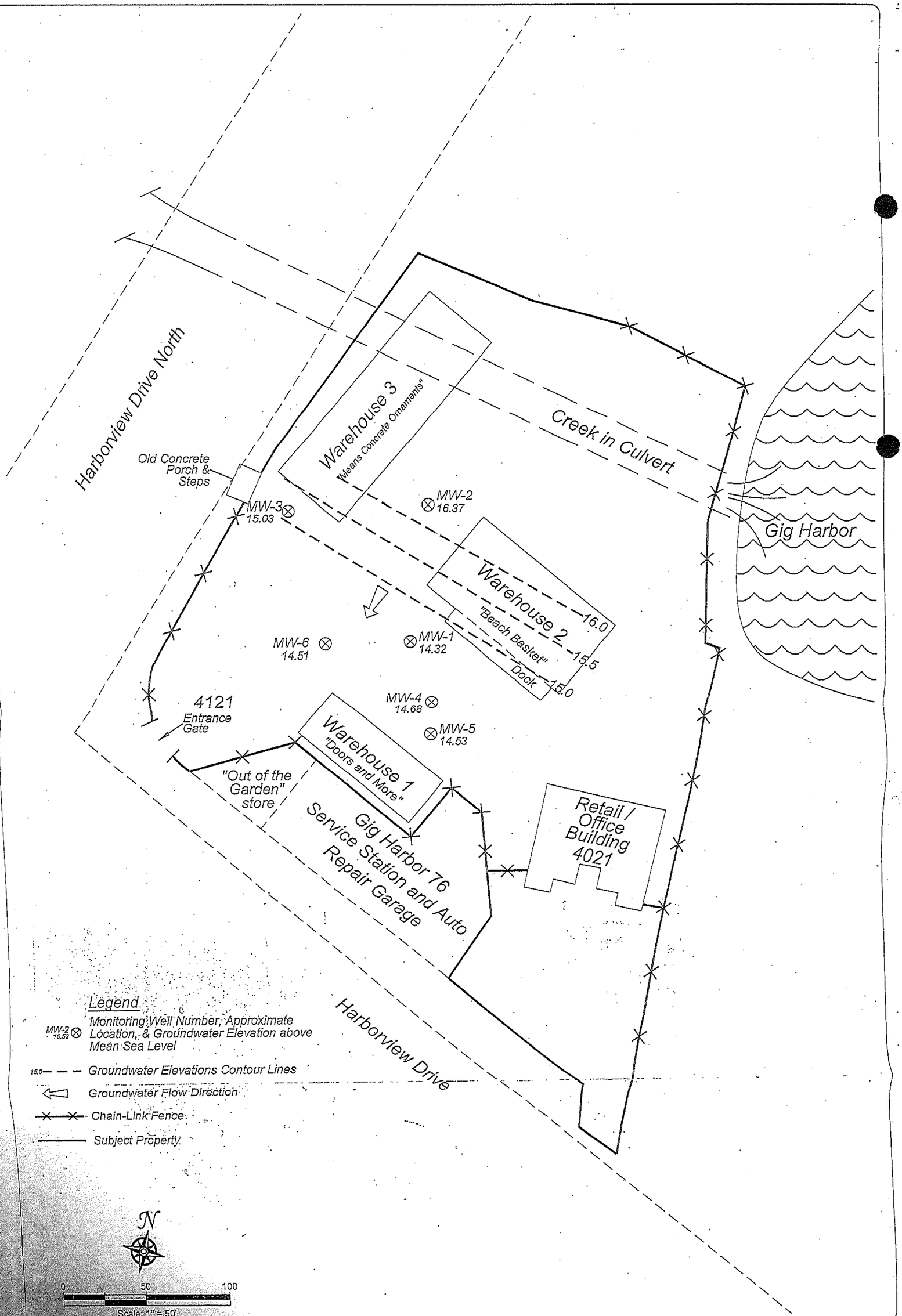
Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

Project: 49567.5

July 2006

Groundwater Elevations and Flow Direction at 12pm (Low Tide)

FIGURE 4b



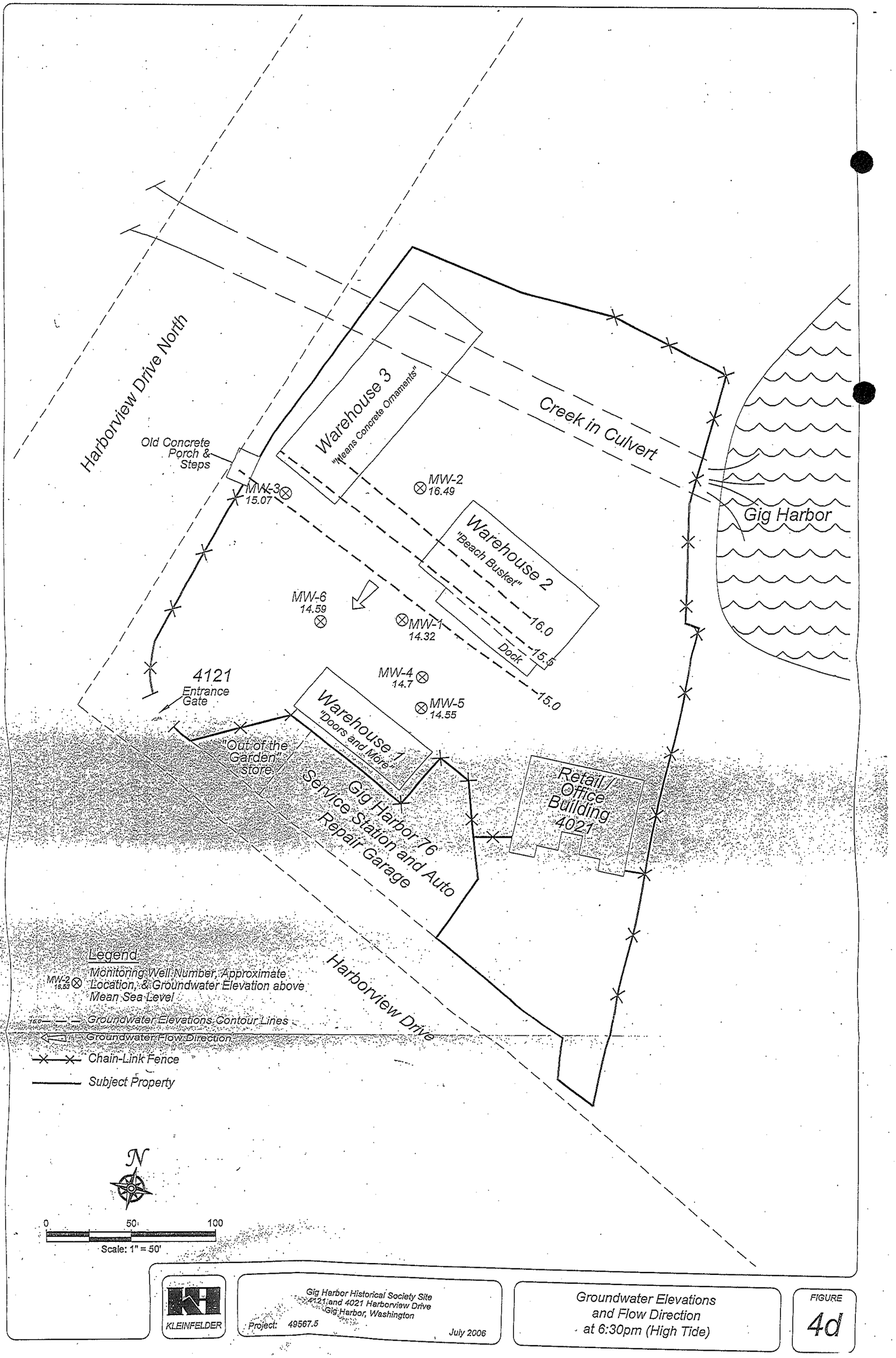
KLEINFELDER

Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

Project: 49567.5 July 2006

Groundwater Elevations
and Flow Direction
at 2:00pm (between Low & High Tide)

FIGURE
4c



KLEINFELDER

Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

Project: 49567.5

July 2006

Groundwater Elevations and Flow Direction at 6:30pm (High Tide)

FIGURE 4d

ENCLOSURE - D

Restrictive Covenant

200704300649 7 PGS
04/30/2007 12:56pm $38.00
PIERCE COUNTY, WASHINGTON

AFTER RECORDING RETURN TO:

Djanne K. Conway
Gordon, Thomas, Honeywell, Malanca,
Peterson & Daheim LLP
1201 Pacific Avenue, Suite 2100
Post Office Box 1157
Tacoma, WA 98401-1157

DECLARATION OF RESTRICTIVE COVENANT

4021 and 4121 Harborview Drive, Gig Harbor, Washington

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by the Gig Harbor Peninsula Historical Society (the Society), its successors and assigns. The Society is the fee owner of the real property (hereafter "Property") in the County of Pierce, State of Washington, that is subject to this Restrictive Covenant. The property is legally described in Exhibit A. This Declaration is for the benefit of the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology"), and it is binding upon the Property.

An independent remedial action consisting of a Limited Phase II Environmental Site Assessment (ESA) and follow-up investigations occurred at the property that is the subject of this Restrictive Covenant. The environmental investigations conducted at the property are described in the following documents: *Phase I and Limited Phase II Environmental Site Assessment – Proposed Gig Harbor Historical Society Site, 4021 and 4121 Harborview Drive, Gig Harbor, Washington*, prepared by Kleinfelder, Inc. Project No. 49567, December 2004; *Supplemental Environmental Investigation at the Gig Harbor Peninsula Historical Society Site*

38-

4021 and 4121 Harborview Drive, Gig Harbor, Washington, prepared by Kleinfelder, Inc. Project No. 49567, June 14, 2006; and *Supplemental Environmental Investigation at the Gig Harbor Peninsula Historical Society site 4021 and 4121 Harborview Drive, Gig Harbor, Washington*, prepared by Kleinfelder, Inc. Project No. 49567, March 7, 2007. These documents are on file at Ecology's Southwest Regional Office.

This Restrictive Covenant is required because the 2004 Limited Phase II ESA identified concentrations of vinyl chloride in groundwater at the property that exceed the Model Toxics Control Act Method A for Groundwater established under WAC 173-340-720. Although the supplemental environmental investigations found no vinyl chloride, required groundwater monitoring is ongoing.

Declaration

The Society makes the following declarations regarding limitations, restrictions, and uses to which the Property may be put and specifies that these declarations constitute covenants to run with the land, as provided by law. These covenants are binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

Section 1. No groundwater may be taken for any use from the Property.

Section 2. Any activity on the Property that may interfere with the continued protection of human health and the environment by resulting in the release or exposure to the environment of the vinyl chloride that may remain on the Property is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of the vinyl chloride that may remain on the Property or create a new exposure

pathway for the vinyl chloride that may remain on the Property is prohibited without prior written approval from Ecology.

Section 4. The Owner of the property must give 30 days advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property will be consummated by the Owner without adequate and complete provision for continued environmental protection.

Section 5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner will allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of inspecting environmental conditions at the Property and inspecting records that are related to environmental conditions.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant will no longer limit use of the Property or be of any further force or effect. Such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

DATE SIGNED: 4/27/07

THE GIG HARBOR PENINSULA HISTORICAL SOCIETY

By: _____

Its: Executive Director

STATE OF WASHINGTON)
)ss.
County of Pierce)

I certify that I know or have satisfactory evidence that Jennifer Kilmer is the person who appeared before me, and said person acknowledged that [he][she] signed this instrument, on oath stated that [he][she] was authorized to execute the instrument and acknowledged it as the Executive Director of the Gig Harbor Peninsula Historical Society, to be the free and voluntary act of such party for the uses and purposes mentioned in the instrument.

DATED this 27 day of April, 2007.

Molly M Towslee
Molly M. Towslee
(Type/Print Name above)
Notary Public in and for the
State of Washington, residing at Gig Harbor
My appointment expires: 12/2/07

MOLLY M. TOWSLEE
MY COMMISSION EXPIRES
DEC 2 2007
PIERCE CO. WASHINGTON
NOTARY PUBLIC

EXHIBIT 'A'

LEGAL DESCRIPTION:

Parcel A:

All that portion of the following described tract, lying Easterly of the Eruaham-Hunt County Road, to-wit:

Commencing at the Northwest corner of Lot 2, Section 6, Township 21 North, Range 2. East, W.M., in Pierce County, Washington;
Thence South 250 feet more or less to the center of a small creek;
Thence Northeasterly along center of said creek to a point that is 417 feet East of the West line of said Lot 2;
Thence North 130 feet more or less to the North line of said Lot 2;
Thence West along North line of said Lot, 417 feet to the place of beginning, in Pierce County, Washington.

Together with that portion of vacated Harborview Avenue North (Burnham Street) adjoining, which upon vacation, attached to said property by operation of law.

Parcel B:

Beginning at Northwest corner of Lot 2, Section 6, Township 21 North, Range 2 East of Willamette Meridian, in Pierce County, Washington, thence running North 89° 08' East on North line of said Lot, 417 feet; thence South parallel to West line of said Lot, 405.15 feet to Northeasterly line of State Highway No. 14; thence North 46° 41'20" West of said Northeasterly line 68.70 feet; thence North parallel to West line of said Lot and on West line of land of C. O. Austin, 144.45 feet to true point of beginning; thence South 45°10' West 55.09 feet; thence North 46°41'20" West 83.97 feet; thence South 80°18'40" West 36 feet, more or less, to County Road; thence on a curve to the right radius 208.75 feet Northerly along Easterly line of said Road 43 feet, more or less, to center line of small creek; thence Easterly on said center line 145 feet, more or less, to a point North of true place of beginning; thence South parallel to West line of said Lot 97.92 feet, more or less, to true place of beginning.

Together with that portion of vacated Harborview Avenue North (Burnham Street) adjoining, which upon vacation, attached to said property by operation of law.

Parcel C:

Commencing at the Northwest comer of Government Lot 2, Sec. 6, Twp. 21 North, Range 2 East of W.M.; thence North 87°08'12" East along the North line of said lot 417 feet to the true point

of beginning of this description; thence continuing North 87°08'12" East along the North line of said lot 138.59 feet; thence South 0°38' East 20.13 feet to an angle point in the government meander line; thence South 15'05'25" West 475 feet, more or less, along the government meander line and along the segment of said meander line extended to the Northerly right of way line of state Highway No. 14; thence Northwesterly following said right of way line to a point North 87°08'12" East 367 feet from the west line of said lot; thence North parallel to said West line of lot 225 feet, more or less, to center of creek, being the creek referred to in contract between J. M. Galbraith Company and Ervin S. Craig and wife, recorded November 25, 1959 under Recording No. 1878550, records of said County; thence North 74°30' East (approximate course) 51.88 feet along center of creek to a point North 87°06'12" East 417 feet from the West line of said lot; thence North parallel to said West line of lot 130 feet to the point of beginning. And including any second class tidelands lying within the boundaries: above described.

Except therefrom that portion conveyed to Howard Austin and Ruth Austin, husband wife, by Deed recorded March 7, 1968 under Recording No. 2229592, described as follows:

Beginning at the Northwest corner of Government lot 2, Section 6, Township 21 North, Range 2 East of the W.M., in Pierce County, Washington (said N.W. corner being Town of Gig Harbor unrecorded Monument #112 - stamped #112 and 1/16); thence along said lot line, North 87°08'12" East 470.0 feet to the true point of beginning; thence continuing along said lot line, North 87°08'12" East 84.79 feet; thence South 0°06'55" West 19.88 feet to Angle Point of Balanced Meridian Line; thence along said Meander Line South 15°05'43" West 6.85 feet; thence South 86°22'39" West 39.25 feet; thence North 65°49'05" West 27.85 feet; thence Northwesterly to the true point of beginning.

Parcel D:

Beginning at the Northwest corner of lot 2, Section 6, Township 21 North, Rang 2 East of the W.M., in Pierce County, Washington; thence running North 89°08' East on the North line of said lot, 417 feet; thence South parallel to West line of said lot 405.15 feet to the Northeasterly line of former State Highway No. 14, now Harborview Avenue West; thence North 46°41'20" West on said Northeasterly line 68.70 feet to the true point of beginning; thence North 54.84 feet; thence South 46°01' West 39.89 feet, more or less, to the Northeasterly line of said Harborview Avenue West; thence South 46°41'20" East 39.50 feet to the true point of beginning.

Parcel E:

All that portion of property described in deed recorded under Record n9 No. 1670316, in Pierce County, Washington, lying Northeasterly of the following described property partition line:

Beginning at the Northwest corner of Government lot 2, Section 6, Township 21 North, Range 2 East of the W.M., in Pierce County, Washington; thence along West line of said Lot 2, South 0°20'26" East 504.42 feet; thence parallel to the North line of said Lot 2, North 87°08'12" East 417.00 feet thence North 47°24'30" West 68.29 feet to a point on the center line of Harborview Avenue West (a monumented street in the Town of Gig Harbor, Wash.); thence North 0°20'26"

West 68.29 feet to the Northeasterly line of said Harborview Avenue West; thence continuing North 0°20'26" West 115.60 feet to the true point of beginning of above said property partition line; thence along property partition line North 46°59'56" West to Northwesterly line of said property described in said deed recorded under Recording No. 1670316.

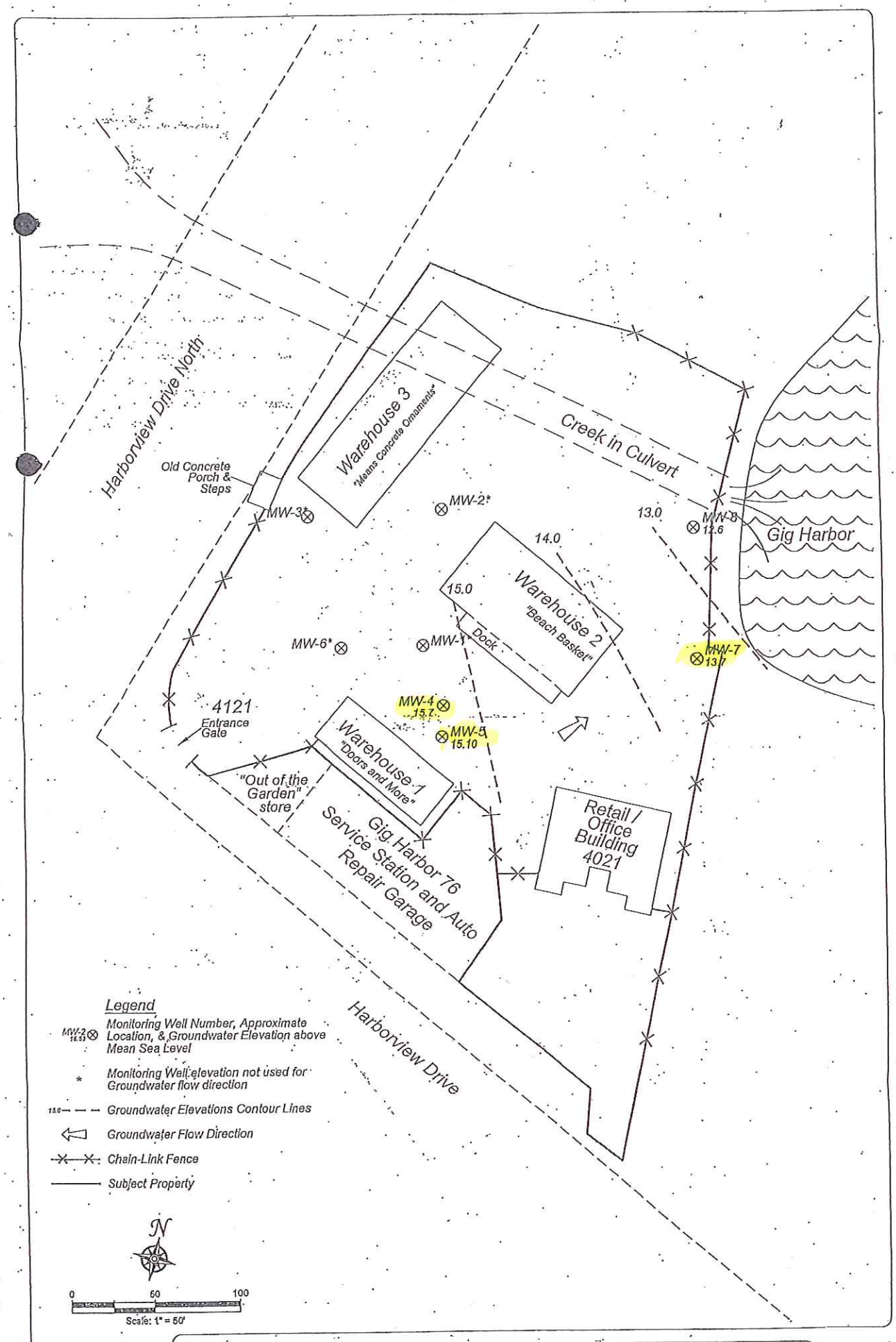
Parcel F:

Beginning at the Northwest corner of Government Lot 2, Section 6, Township 2 North, Range 2 East of the W.M.; in Pierce County, Washington (said Northwest corner being Town of Gig arbor, unrecorded Monument #112-stamped #112 and 1/16); thence North 87°08'12" East along the North line of lot 2, 309.23 feet to true point of beginning on Southerly right of way line of Harborview Avenue North; thence, on lot line, North 87°08'12" East 161.57 feet; thence North 69°37'35" West 30.48 feet; thence North 75°08'18" West 27.96 feet; thence North 64°35' West 68.71 feet to the Southerly right of way line of Harborview Avenue North; thence on said right of way line Southwesterly to true point of beginning, the above being portion of Lot 7, Block 1, Extension of the City of Gig Harbor, Pierce County, Washington, according to Plat recorded in Volume 6 of Plat 5 at Page 74, in Pierce County! Washington.

Except that portion conveyed to the Town of Gig Harbor by Instrument recorded under Recording No. 1520257.

ENCLOSURE - E

Groundwater Monitoring Well Locations and Laboratory Results (January 2015 through January 2017)



KLEINFELDER

Gig Harbor Historical Society Site
4121 and 4021 Harborview Drive
Gig Harbor, Washington

Project 49557.6 February 2007

Groundwater Monitoring Well Locations

HARBOR HISTORY MUSEUM

March 28, 2017

Mr. Panjini Balaraju
Toxics Cleanup Program
Southwest Regional Office
Department of Ecology

Dear Mr. Balaraju,

As you are aware, the Harbor History Museum have a desire to obtain a No Further Action (NFA) letter from the Department of Ecology in regards to the property located at 4121 Harborview Dr Gig Harbor, WA 98335. Our objective under the Voluntary Cleanup Program (VCP) is to obtain groundwater monitoring data for four consecutive quarters showing no detectable amounts of chemicals of concern. Listed below are the laboratory results from the latest sampling and analysis.

2017 QTR 1 Data analysis- sample

Two groundwater monitoring wells (MW-05 and MW-07) were sampled on 3/9/2017 using the proper low flow sampling techniques with the samples being sent to Spectra Laboratories in Tacoma Washington for Volatile Organic Analysis (VOA). The results from reported for these samples showed **non-detects for all chemicals of concern** from well MW7 and well MW5.

Included in this letter are:

- Copy of the raw laboratory data and associated QA/QC.
- The field data showing the typical field reporting results.
- Copy of the chain of custody.

Field Data

Well number	MW-5	MW-7
Date	3/9/17	3/9/17
Time	1020 hrs	1100 hrs
Depth to top of water	3'1"	5'0"
Depth to bottom of well	15'5"	15'4"
Water depth	12'4"	10'4"
Purge volume	5 gallons	5 gallons
Beginning Conductivity	95	285
Beginning pH	7.0	7.0
Ending Conductivity	95	285
Ending pH	7.0	7.0

Mirna Fritz

Mirna Fritz
Harbor History Museum
Email: mirnaf@harborhistorymuseum.org

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03/27/2017

P.O.#: *

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Client ID: MW5
Sample Matrix: Water
Date Sampled: 03/09/2017
Date Received: 03/09/2017
Spectra Project: 2017030300
Spectra Number:2

Analyte	Result	Units	Method
Chloroethane	<1	µg/L	SW846 8260C
Chloroform	<1	µg/L	SW846 8260C
Chloromethane	<1	µg/L	SW846 8260C
Dibromomethane	<1	µg/L	SW846 8260C
Dichlorodifluoromethane	<1	µg/L	SW846 8260C
Ethylbenzene	<1	µg/L	SW846 8260C
Hexachlorobutadiene	<1	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C
Isopropylbenzene	<1	µg/L	SW846 8260C
Methyl-tert-Butyl Ether	<10	µg/L	SW846 8260C
Methylene chloride	<1	µg/L	SW846 8260C
Naphthalene	<1	µg/L	SW846 8260C
Styrene	<1	µg/L	SW846 8260C
Tetrachloroethene	<1	µg/L	SW846 8260C
Toluene	<1	µg/L	SW846 8260C
Total Xylenes	<2	µg/L	SW846 8260C
Trichloroethene	<1	µg/L	SW846 8260C
Trichlorofluoromethane	<1	µg/L	SW846 8260C
Vinyl Acetate	<10	µg/L	SW846 8260C
Vinyl chloride	<0.2	µg/L	SW846 8260C
cis-1,2-Dichloroethene	<1	µg/L	SW846 8260C
cis-1,3-Dichloropropene	<1	µg/L	SW846 8260C
n-Butylbenzene	<1	µg/L	SW846 8260C
n-Propylbenzene	<1	µg/L	SW846 8260C
sec-Butylbenzene	<1	µg/L	SW846 8260C
tert-Butylbenzene	<1	µg/L	SW846 8260C
trans-1,2-Dichloroethene	<1	µg/L	SW846 8260C
trans-1,3-Dichloropropene	<1	µg/L	SW846 8260C

Surrogate	Recovery	Method
Dibromofluoromethane	95	SW846 8260C
1,2-Dichloroethane-d4	93	SW846 8260C
Toluene-d8	92	SW846 8260C
4-Bromofluorobenzene	97	SW846 8260C

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Jeffrey Cooper, Laboratory Manager

a14jjb

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03/27/2017

P.O.#: *

Client ID: MW7
Sample Matrix: Water
Date Sampled: 03/09/2017
Date Received: 03/09/2017
Spectra Project: 2017030300
Spectra Number:3

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method
Chloroethane	<1	µg/L	SW846 8260C
Chloroform	<1	µg/L	SW846 8260C
Chloromethane	<1	µg/L	SW846 8260C
Dibromomethane	<1	µg/L	SW846 8260C
Dichlorodifluoromethane	<1	µg/L	SW846 8260C
Ethylbenzene	<1	µg/L	SW846 8260C
Hexachlorobutadiene	<1	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C
Isopropylbenzene	<1	µg/L	SW846 8260C
Methyl-tert-Butyl Ether	<10	µg/L	SW846 8260C
Methylene chloride	<1	µg/L	SW846 8260C
Naphthalene	<1	µg/L	SW846 8260C
Styrene	<1	µg/L	SW846 8260C
Tetrachloroethene	<1	µg/L	SW846 8260C
Toluene	<1	µg/L	SW846 8260C
Total Xylenes	<2	µg/L	SW846 8260C
Trichloroethene	<1	µg/L	SW846 8260C
Trichlorofluoromethane	<1	µg/L	SW846 8260C
Vinyl Acetate	<10	µg/L	SW846 8260C
Vinyl chloride	<0.2	µg/L	SW846 8260C
cis-1,2-Dichloroethene	<1	µg/L	SW846 8260C
cis-1,3-Dichloropropene	<1	µg/L	SW846 8260C
n-Butylbenzene	<1	µg/L	SW846 8260C
n-Propylbenzene	<1	µg/L	SW846 8260C
sec-Butylbenzene	<1	µg/L	SW846 8260C
tert-Butylbenzene	<1	µg/L	SW846 8260C
trans-1,2-Dichloroethene	<1	µg/L	SW846 8260C
trans-1,3-Dichloropropene	<1	µg/L	SW846 8260C

Surrogate	Recovery	Method
Dibromofluoromethane	96	SW846 8260C
1,2-Dichloroethane-d4	93	SW846 8260C
Toluene-d8	93	SW846 8260C
4-Bromofluorobenzene	98	SW846 8260C

SPECTRA LABORATORIES

Jeffrey Cooper, Laboratory Manager

a14/jjb

HARBOR HISTORY MUSEUM

December 2, 2016

Mr. Panjini Balaraju
Toxics Cleanup Program
Southwest Regional Office
Department of Ecology

Dear Mr. Balaraju,

As you are aware, the Harbor History Museum have a desire to obtain a No Further Action (NFA) letter from the Department of Ecology in regards to the property located at 4121 Harborview Dr. Gig Harbor, WA 98332. Our objective under the Voluntary Cleanup Program (VCP) is to obtain groundwater monitoring data for four consecutive quarters showing no detectable amounts of chemicals of concern. Listed below are the laboratory results from the latest sampling and analysis.

2016 QTR 4 Data analysis- sample

Two groundwater monitoring wells (MW-05 and MW-07) were sampled on 11/3/2016 using the proper low flow sampling techniques with the samples being sent to Spectra Laboratories in Tacoma Washington for Volatile Organic Analysis (VOA). The results from reported for these samples showed **non-detects for all chemicals of concern** from well MW7 and well MW5.

Included in this letter are:

- Copy of the raw laboratory data and associated QA/QC.
- The field data showing the typical field reporting results.
- Copy of the chain of custody.

Field Data

Well number	MW-5	MW-7
Date	11/3/16	11/3/16
Time	1300 hrs	1330 hrs
Depth to top of water	3'2"	5'2"
Depth to bottom of well	15'5"	15'4"
Water depth	12'3"	10'2"
Purge volume	5 gallons	5 gallons
Beginning Conductivity	100	330
Beginning pH	7.0	6.8
Ending Conductivity	100	330
Ending pH	7.0	6.8

Mirna Fritz
Harbor History Museum
Email: mirnaf@harborhistorymuseum.org

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11/30/2016

P.O.#: *

Client ID: MW5
Sample Matrix: Water
Date Sampled: 11/03/2016
Date Received: 11/03/2016
Spectra Project: 2016110151
Spectra Number: 1

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method	Analyte	Result	Units	Method
Carbon Disulfide	<10	µg/L	SW846 8260C	Trichloroethene	<1	µg/L	SW846 8260C
Carbon Tetrachloride	<1	µg/L	SW846 8260C	Trichlorofluoromethane	<1	µg/L	SW846 8260C
Chlorobenzene	<1	µg/L	SW846 8260C	Vinyl Acetate	<10	µg/L	SW846 8260C
Chlorodibromomethane	<1	µg/L	SW846 8260C	Vinyl chloride	<0.2	µg/L	SW846 8260C
Chloroethane	<1	µg/L	SW846 8260C	cis-1,2-Dichloroethene	<1	µg/L	SW846 8260C
Chloroform	<1	µg/L	SW846 8260C	cis-1,3-Dichloropropene	<1	µg/L	SW846 8260C
Chloromethane	<1	µg/L	SW846 8260C	n-Butylbenzene	<1	µg/L	SW846 8260C
Dibromomethane	<1	µg/L	SW846 8260C	n-Propylbenzene	<1	µg/L	SW846 8260C
Dichlorodifluoromethane	<1	µg/L	SW846 8260C	sec-Butylbenzene	<1	µg/L	SW846 8260C
Ethylbenzene	<1	µg/L	SW846 8260C	tert-Butylbenzene	<1	µg/L	SW846 8260C
Hexachlorobutadiene	<1	µg/L	SW846 8260C	trans-1,2-Dichloroethene	<1	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C	trans-1,3-Dichloropropene	<1	µg/L	SW846 8260C
Isopropylbenzene	<1	µg/L	SW846 8260C				
Methyl-tert-Butyl Ether	<10	µg/L	SW846 8260C				
Methylene chloride	<5	µg/L	SW846 8260C				
Styrene	<1	µg/L	SW846 8260C				
Tetrachloroethene	<1	µg/L	SW846 8260C				
Toluene	<1	µg/L	SW846 8260C				
Total Xylenes	<2	µg/L	SW846 8260C				

Surrogate	Recovery	Method
Dibromofluoromethane	130	SW846 8260C
1,2-Dichloroethane-d4	126	SW846 8260C
Toluene-d8	75	SW846 8260C
4-Bromofluorobenzene	103	SW846 8260C

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Steve Hibbs, Laboratory Manager
a14exsur/jac

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11/30/2016

P.O.#: *

Client ID: MW7
Sample Matrix: Water
Date Sampled: 11/03/2016
Date Received: 11/03/2016
Spectra Project: 2016110151
Spectra Number: 2

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method	Analyte	Result	Units	Method
1,1,1,2-Tetrachloroethane	<1	µg/L	SW846 8260C	1,4-Dichlorobenzene	<1	µg/L	SW846 8260C
1,1,1-Trichloroethane	<1	µg/L	SW846 8260C	2,2-Dichloropropane	<1	µg/L	SW846 8260C
1,1,2,2-Tetrachloroethane	<1	µg/L	SW846 8260C	2-Butanone (MEK)	<10	µg/L	SW846 8260C
1,1,2-Trichloroethane	<1	µg/L	SW846 8260C	2-Chloroethylvinyl Ether	<10	µg/L	SW846 8260C
1,1-Dichloroethane	<1	µg/L	SW846 8260C	2-Chlorotoluene	<1	µg/L	SW846 8260C
1,1-Dichloroethene	<1	µg/L	SW846 8260C	2-Hexanone (MBK)	<10	µg/L	SW846 8260C
1,1-Dichloropropene	<1	µg/L	SW846 8260C	4-Chlorotoluene	<1	µg/L	SW846 8260C
1,2,3-Trichlorobenzene	<1	µg/L	SW846 8260C	4-Isopropyltoluene	<1	µg/L	SW846 8260C
1,2,3-Trichloropropane	<1	µg/L	SW846 8260C	4-methyl-2-pentanone (MIBK)	<10	µg/L	SW846 8260C
1,2,4-Trichlorobenzene	<1	µg/L	SW846 8260C	Acetone	<10	µg/L	SW846 8260C
1,2,4-Trimethylbenzene	<1	µg/L	SW846 8260C	Acetonitrile	<10	µg/L	SW846 8260C
1,2-Dibromo3Chloropropane	<10	µg/L	SW846 8260C	Acrolein	<10	µg/L	SW846 8260C
1,2-Dibromoethane (EDB)	<1	µg/L	SW846 8260C	Acrylonitrile	<10	µg/L	SW846 8260C
1,2-Dichlorobenzene	<1	µg/L	SW846 8260C	Benzene	<1	µg/L	SW846 8260C
1,2-Dichloroethane	<1	µg/L	SW846 8260C	Bromobenzene	<1	µg/L	SW846 8260C
1,2-Dichloropropane	<1	µg/L	SW846 8260C	Bromochloromethane	<1	µg/L	SW846 8260C
1,3,5-Trimethylbenzene	<1	µg/L	SW846 8260C	Bromodichloromethane	<1	µg/L	SW846 8260C
1,3-Dichlorobenzene	<1	µg/L	SW846 8260C	Bromoform	<1	µg/L	SW846 8260C
1,3-Dichloropropane	<1	µg/L	SW846 8260C	Bromomethane	<1	µg/L	SW846 8260C

Surrogate	Recovery	Method
Dibromofluoromethane	130	SW846 8260C
1,2-Dichloroethane-d4	126	SW846 8260C
Toluene-d8	75	SW846 8260C
4-Bromofluorobenzene	103	SW846 8260C

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager

a14exsur/jac

HARBOR HISTORY MUSEUM

May 26, 2016

Mr. Panjini Balaraju
Toxics Cleanup Program
Southwest Regional Office
Department of Ecology

Dear Mr. Balaraju,

As you are aware, the Harbor History Museum have a desire to obtain a No Further Action (NFA) letter from the Department of Ecology in regards to the property located at 4121 Harborview Dr Gig Harbor, WA 98335. Our objective under the Voluntary Cleanup Program (VCP) is to obtain groundwater monitoring data for four consecutive quarters showing no detectable amounts of chemicals of concern. Listed below are the laboratory results from the latest sampling and analysis.

2016 QTR 2 Data analysis- sample

Two groundwater monitoring wells (MW-05 and MW-07) were sampled on 4/20/2016 using the proper low flow sampling techniques with the samples being sent to Spectra Laboratories in Tacoma Washington for Volatile Organic Analysis (VOA). The results from reported for these samples showed **non-detects for all chemicals of concern** from well MW7 and well MW5.

Included in this letter are:

- Copy of the raw laboratory data and associated QA/QC.
- The field data showing the typical field reporting results.
- Copy of the chain of custody.

Field Data

Well number	MW-5	MW-7
Date	4/10/16	4/10/16
Time	1100 hrs	1145 hrs
Depth to top of water	5'5"	6'5"
Depth to bottom of well	15'5"	15'4"
Water depth	10'0"	9'11"
Purge volume	5 gallons	5 gallons
Beginning Conductivity	140	310
Beginning pH	7.1	6.9
Ending Conductivity	140	310
Ending pH	7.1	6.9

Mirna Fritz
Harbor History Museum
Email: mirnaf@harborhistorymuseum.org

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05/24/2016

P.O.#: *

Client ID: MW 5
Sample Matrix: Water
Date Sampled: 04/20/2016
Date Received: 04/20/2016
Spectra Project: 2016040510
Spectra Number: 2

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method
Chloroethane	<2.0	µg/L	SW846 8260C
Chloroform	<1.0	µg/L	SW846 8260C
Chloromethane	<2.0	µg/L	SW846 8260C
Dibromomethane	<1.0	µg/L	SW846 8260C
Dichlorodifluoromethane	<1.0	µg/L	SW846 8260C
Ethylbenzene	<1.0	µg/L	SW846 8260C
Hexachlorobutadiene	<1.0	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C
Isopropylbenzene	<1.0	µg/L	SW846 8260C
Methyl-tert-Butyl Ether	<1.0	µg/L	SW846 8260C
Methylene chloride	<1.0	µg/L	SW846 8260C
Naphthalene	<1.0	µg/L	SW846 8260C
Styrene	<1.0	µg/L	SW846 8260C
Tetrachloroethene	<1.0	µg/L	SW846 8260C
Toluene	<1.0	µg/L	SW846 8260C
Total Xylenes	<2.0	µg/L	SW846 8260C
Trichloroethene	<1.0	µg/L	SW846 8260C
Trichlorofluoromethane	<1.0	µg/L	SW846 8260C
Vinyl Acetate	<10	µg/L	SW846 8260C
Vinyl chloride	<0.2	µg/L	SW846 8260C
cis-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
cis-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C
n-Butylbenzene	<1.0	µg/L	SW846 8260C
n-Propylbenzene	<1.0	µg/L	SW846 8260C
sec-Butylbenzene	<1.0	µg/L	SW846 8260C
tert-Butylbenzene	<1.0	µg/L	SW846 8260C
trans-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
trans-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C

Vinyl Chloride analysis performed using a 25ml sparge for a reporting limit of 0.2 ug/L.

Surrogate	Recovery	Method
Dibromofluoromethane	116	SW846 8260C
1,2-Dichloroethane-d4	124	SW846 8260C
Toluene-d8	89	SW846 8260C
4-Bromofluorobenzene	122	SW846 8260C

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager
a14/sgh

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05/24/2016

P.O.#: *

Client ID: MW 7
Sample Matrix: Water
Date Sampled: 04/20/2016
Date Received: 04/20/2016
Spectra Project: 2016040510
Spectra Number:3

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method
Chloroethane	<2.0	µg/L	SW846 8260C
Chloroform	<1.0	µg/L	SW846 8260C
Chloromethane	<2.0	µg/L	SW846 8260C
Dibromomethane	<1.0	µg/L	SW846 8260C
Dichlorodifluoromethane	<1.0	µg/L	SW846 8260C
Ethylbenzene	<1.0	µg/L	SW846 8260C
Hexachlorobutadiene	<1.0	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C
Isopropylbenzene	<1.0	µg/L	SW846 8260C
Methyl-tert-Butyl Ether	<1.0	µg/L	SW846 8260C
Methylene chloride	<1.0	µg/L	SW846 8260C
Naphthalene	<1.0	µg/L	SW846 8260C
Styrene	<1.0	µg/L	SW846 8260C
Tetrachloroethene	<1.0	µg/L	SW846 8260C
Toluene	<1.0	µg/L	SW846 8260C
Total Xylenes	<2.0	µg/L	SW846 8260C
Trichloroethene	<1.0	µg/L	SW846 8260C
Trichlorofluoromethane	<1.0	µg/L	SW846 8260C
Vinyl Acetate	<10	µg/L	SW846 8260C
Vinyl chloride	<0.2	µg/L	SW846 8260C
cis-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
cis-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C
n-Butylbenzene	<1.0	µg/L	SW846 8260C
n-Propylbenzene	<1.0	µg/L	SW846 8260C
sec-Butylbenzene	<1.0	µg/L	SW846 8260C
tert-Butylbenzene	<1.0	µg/L	SW846 8260C
trans-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
trans-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C

Vinyl Chloride analysis performed using a 25ml sparge for a reporting limit of 0.2 ug/L.

Surrogate	Recovery	Method
Dibromofluoromethane	116	SW846 8260C
1,2-Dichloroethane-d4	130	SW846 8260C
Toluene-d8	85	SW846 8260C
4-Bromofluorobenzene	119	SW846 8260C

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager
a14/sgh

HARBOR HISTORY MUSEUM

March 15, 2016

Mr. Panjini Balaraju
Toxics Cleanup Program
Southwest Regional Office
Department of Ecology

Dear Mr. Balaraju,

My name is Mirna Fritz and I am the Office Manager at Harbor History Museum. As you are aware, the Harbor History Museum have a desire to obtain a No Further Action (NFA) letter from the Department of Ecology in regards to the property located at 4121 Harborview Dr Gig Harbor, WA 98335. Our objective under the Voluntary Cleanup Program (VCP) is to obtain groundwater monitoring data for four consecutive quarters showing no detectable amounts of chemicals of concern. Listed below are the laboratory results from the latest sampling and analysis.

2016 QTR 1 Data analysis

Two groundwater monitoring wells (MW-05 and MW-07) were sampled on 3/04/2016 using the /proper low flow sampling techniques with the samples being sent to Spectra Laboratories in Tacoma Washington for Volatile Organic Analysis (VOA). The results from reported for these samples showed **non-detects for all chemicals of concern** from both well MW7 and MW5.

Included in this letter are:

- Copy of the raw laboratory data and associated QA/QC.
- The field data showing the typical field reporting results.
- Copy of the chain of custody.

Field Data

Well number	MW-5	MW-7
Date	3/4/2015	3/4/2015
Time	1015 hrs	1145 hrs
Depth to top of water	3'0"	4'3"
Depth to bottom of well	15'5"	15'4"
Water depth	12'5"	11'1"
Purge volume	5 gallons	5 gallons
Beginning Conductivity	130	390
Beginning pH	7.0	6.9
Ending Conductivity	130	390
Ending pH	7.0	6.9

Mirna Fritz
Harbor History Museum
Email: mirnaf@harborhistorymuseum.org

SPECTRA Laboratories ...Where experience matters
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03/14/2016

P.O.#: *

Client ID: MW 5
Sample Matrix: Water
Date Sampled: 03/03/2016
Date Received: 03/04/2016
Spectra Project: 2016030112
Spectra Number:2

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method
Chloroethane	<2.0	µg/L	SW846 8260C
Chloroform	<1.0	µg/L	SW846 8260C
Chloromethane	<2.0	µg/L	SW846 8260C
Dibromomethane	<1.0	µg/L	SW846 8260C
Dichlorodifluoromethane	<1.0	µg/L	SW846 8260C
Ethylbenzene	<1.0	µg/L	SW846 8260C
Hexachlorobutadiene	<1.0	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C
Isopropylbenzene	<1.0	µg/L	SW846 8260C
Methyl-tert-Butyl Ether	<1.0	µg/L	SW846 8260C
Methylene chloride	<1.0	µg/L	SW846 8260C
Naphthalene	<1.0	µg/L	SW846 8260C
Styrene	<1.0	µg/L	SW846 8260C
Tetrachloroethene	<1.0	µg/L	SW846 8260C
Toluene	<1.0	µg/L	SW846 8260C
Total Xylenes	<2.0	µg/L	SW846 8260C
Trichloroethene	<1.0	µg/L	SW846 8260C
Trichlorofluoromethane	<1.0	µg/L	SW846 8260C
Vinyl Acetate	<10	µg/L	SW846 8260C
Vinyl chloride	<0.2	µg/L	SW846 8260C
cis-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
cis-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C
n-Butylbenzene	<1.0	µg/L	SW846 8260C
n-Propylbenzene	<1.0	µg/L	SW846 8260C
sec-Butylbenzene	<1.0	µg/L	SW846 8260C
tert-Butylbenzene	<1.0	µg/L	SW846 8260C
trans-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
trans-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C

Vinyl Chloride run using a 25ml sparge, in order to achieve a reporting limit of 0.2 ug/L.

Surrogate	Recovery	Method
1,2-Dichloroethane-d4	120	SW846 8260C
4-Bromofluorobenzene	119	SW846 8260C
Dibromofluoromethane	128	SW846 8260C
Toluene-d8	87	SW846 8260C

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager
a14/sgh

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03/14/2016

P.O.#: *

Client ID: MW 7
Sample Matrix: Water
Date Sampled: 03/03/2016
Date Received: 03/04/2016
Spectra Project: 2016030112
Spectra Number:3

Harbor History Museum
4121 Harborview Dr.
Gig Harbor, WA 98332

Analyte	Result	Units	Method
Chloroethane	<2.0	µg/L	SW846 8260C
Chloroform	<1.0	µg/L	SW846 8260C
Chloromethane	<2.0	µg/L	SW846 8260C
Dibromomethane	<1.0	µg/L	SW846 8260C
Dichlorodifluoromethane	<1.0	µg/L	SW846 8260C
Ethylbenzene	<1.0	µg/L	SW846 8260C
Hexachlorobutadiene	<1.0	µg/L	SW846 8260C
Iodomethane	<10	µg/L	SW846 8260C
Isopropylbenzene	<1.0	µg/L	SW846 8260C
Methyl-tert-Butyl Ether	<1.0	µg/L	SW846 8260C
Methylene chloride	<1.0	µg/L	SW846 8260C
Naphthalene	<1.0	µg/L	SW846 8260C
Styrene	<1.0	µg/L	SW846 8260C
Tetrachloroethene	<1.0	µg/L	SW846 8260C
Toluene	<1.0	µg/L	SW846 8260C
Total Xylenes	<2.0	µg/L	SW846 8260C
Trichloroethene	<1.0	µg/L	SW846 8260C
Trichlorofluoromethane	<1.0	µg/L	SW846 8260C
Vinyl Acetate	<10	µg/L	SW846 8260C
Vinyl chloride	<0.2	µg/L	SW846 8260C
cis-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
cis-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C
n-Butylbenzene	<1.0	µg/L	SW846 8260C
n-Propylbenzene	<1.0	µg/L	SW846 8260C
sec-Butylbenzene	<1.0	µg/L	SW846 8260C
tert-Butylbenzene	<1.0	µg/L	SW846 8260C
trans-1,2-Dichloroethene	<1.0	µg/L	SW846 8260C
trans-1,3-Dichloropropene	<1.0	µg/L	SW846 8260C

Vinyl Chloride run using a 25ml sparge, in order to achieve a reporting limit of 0.2 ug/L.

Surrogate	Recovery	Method
1,2-Dichloroethane-d4	122	SW846 8260C
4-Bromofluorobenzene	115	SW846 8260C
Dibromofluoromethane	130	SW846 8260C
Toluene-d8	89	SW846 8260C

SPECTRA LABORATORIES

Steve Hibbs, Laboratory Manager
a14/sgh

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

September 6, 2017

Electronic Copy

Ms. Christine Hewitson
4021 Harborview LLC
PO Box 1805
Gig Harbor, WA 98335

Re: Peninsula Light Company (Gig Harbor Peninsula Historical Society)

Dear Ms. Hewitson:

We received your letter of August 16, 2017 requesting clarification regarding the Department of Ecology's (Ecology) no further action (NFA) letter dated May 16, 2017 issued for the Peninsula Light Company Site located at 4021 and 4121 Harborview Drive, Gig Harbor, Washington 98335 (Facility Site ID# 88123954; Cleanup Site ID#: 6806; VCP Project #: SW0634).

Ecology sent the above NFA letter to the Gig Harbor Peninsula Historical Society for meeting the Model Toxics Control Act (MTCA) cleanup level for vinyl chloride in the groundwater at the Peninsula Light Company Site (Enclosure-C). This NFA letter was issued for the whole Site which included five parcel numbers 0221064001, 0221064054, 0221064069, 0221064118 and 0221064137 (Enclosure-A).

However, Ecology understands that the above five parcel numbers no longer exists and have been replaced with two new parcel numbers 4002990010 and 4002990020 (Enclosure-B). Also based on the Property purchase document that you sent to Ecology, we understand that one of the new parcel number (4002990020) is owned by 4021 Harborview LLC; the other new parcel number (4002990010) is owned by the Gig Harbor Peninsula Historical Society.

Ecology's August 16, 2017 NFA letter was issued for the whole Site which comprised of the above cited five parcel numbers, which were replaced with two new parcel numbers. Hence, the August 16, 2017 NFA letter is also valid to both new parcel numbers, 4002990020 and 4002990010. As a result, no further remedial action is necessary to clean up the vinyl chloride contamination in the groundwater at the Peninsula Light Company Site including the parcel number 4002990020, which is currently owned by the 4021 Harborview LLC.

If you have any questions, please call me at (360) 407-6335.

Sincerely,

Ranjini Balaraju, P.E.
Periodic Review Coordinator
Toxics Cleanup Program
Southwest Regional Office

Enclosures: (3)

By Certified Mail: [91 7199 9991 7037 7496 0401]

Enclosure-A: Original Parcel Numbers
Enclosure-B: Current/New Parcel Numbers
Enclosure-C: May 16, 2017 NFA Letter

cc: Stephanie Lile, Gig Harbor Peninsula Historical Society (without Enclosure-C)
Central Files (without Enclosure-C)