# **CLEANUP ACTION PLAN (CAP)**

**Gig Harbor Dry Cleaners** 

6978 Kimball Drive Gig Harbor, Washington

May 5, 2015

Prepared For:

**Orlandini & Waldron** 6711 Regents Blvd. W. University Place, Washington 98466

Brian A. Dixon

Sr. Environmental Scientist

Stephen Spencer Principal Environmental Scientist

**Prepared By:** 

ECI | Environmental Consulting 1931 S. Fawcett Avenue Tacoma, Washington 98402 (253) 238-9270

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# 1.0 INTRODUCTION

EcoCon, Inc., (ECI) has prepared this Cleanup Action Plan (CAP) for the property located at 6978 Kimball Drive, in Gig Harbor Washington (the Property) (Figure 1) on behalf of Orlandini and Waldron, the Property Trustee. This CAP was prepared for submittal to the Washington State Department of Ecology (Ecology), and was developed to meet the general requirements of a CAP as defined by the Washington State Model Toxics Control Act (MTCA) Regulation in Chapter 173-340-380 of the Washington Administrative Code (WAC).

As established in WAC 173-340-200, the "Site" is defined by the full lateral and vertical extent of contamination that has resulted from the operation of a dry cleaning facility on the Property. Based on the findings of environmental investigations discussed within this report, the Site has been defined as perchloroethylene (PCE) contaminated soil beneath the northern portion of the Property, beneath the dry cleaning facility extending east beyond the facility entrance (Figure 3, Appendix A).

# 1.1 Document Purpose

The purpose of this CAP is to satisfy the specific requirements of MTCA in accordance with WAC 173-340-380, -400, and -410 and to obtain a determination of No Further Action (NFA) from Ecology. This CAP presents historical information regarding the source and extent of impacts and outlines the proposed corrective action to address the full extent of contamination beneath the Site.

# **1.2** Site Location / Description

The Property consists of a single tax parcel #0221087024, which is part of a larger shopping center development known as Pioneer Plaza/Kimball Center. The Property is improved with a Burger King restaurant situated within the central portion of the Property, a vacant commercial building located on the southern side of the Property, and an approximately 8,129 square foot, single story, retail strip mall building, with six units including: Ultimate Looks (6932), Framer's Workshop (6940), Clark's Jewelers (6946), Kimball Espresso Café (6950), a vacant suite (6968), and Gig Harbor Cleaners (6978). The south building is an approximately 5,738 square foot, vacant single story building (6876 and 6878).

The Gig Harbor Dry Cleaners facility is located at the north margin of the building in an approximately 1,700 square foot space, with a main entrance to the east, followed by a service counter, and clothing storage area. Located near the western (rear) portion of the facility are a restroom, a boiler and utility room, a PCE drum storage area, and a PCE dry cleaning machine.

The Property was originally developed prior to 1968 with four residential structures located on the northern portion of the Property. By 1985, the Property was developed with the construction of the three present-day structures. The north shop appears to have operated as a dry cleaner since 1985. The

Property is located in a commercially developed area of Gig Harbor. To the north is Pioneer Way followed by Cathouse Tattoo. To the south is a shopping center. To the east is Kimball Drive followed by a 76 franchised gasoline station, a thrift store, undeveloped wooded land, and Custom Homes. To the west is an electrical utilities right-of-way, followed by the Highway 16. The vicinity is generally flat and consists of connected masonry buildings with asphalt parking, and is bordered by retail businesses to the north and east.

The following is the legal description of the property as provided by Pierce County Assessor's website:

#### Parcel #0221087024:

Section 08 Township 21 Range 02 Quarter 32 : TR "A" OF DBLR 85-01-18-0280 DESC AS FOLL PARCEL A DESC AS L 1 & 2 OF S P 84-02-10-0196 PARCEL B COM AT NW COR OF LOT 3 GIG HARBOR ABAND MILITARY RESERV TH E ALG N LI SD LOT 3 326.43 FT TO E R/W LI OF TAC CY LIGHT R/W & POB TH CONT E ALG N LI SD LOT 3 57.57 FT TH N 15 DEG 25 MIN 13 SEC E 116.74 FT TO SWLY R/W LI OF FRONTAGE RD (FR3 LI) TH S 34 DEG 05 MIN 01 SEC E ALG SD R/W LI 185.46 FT TH ALG C TO R HAVING RAD OF 570 FT FOR ARC LENGTH OF 49.97 FT HAVING CENTRAL ANGLE OF 05 DEG 01 MIN 24 SEC TH S 55 DEG 54 MIN 59 SEC W 231.92 FT TO SD E R/W LI OF TAC CY LIGHT POWERLINE TH N 01 DEG 46 MIN 12 SEC W ALG SD E LI 80.27 FT TH ALG C TO L HAVING RAD OF 470 FT AN ARC LENGTH OF 137.4 FT HAVING CENTRAL ANGLE OF 16 DEG 44 MIN 59 SEC TO POB PARCEL C THAT POR OF LOT 2A OF GIG HARBOR ABAND MIL RESERV LY E OF PARCEL A W OF MOST ELY W LI OF PARCEL B & S OF SWLY R/W LI OF FRONTAGE RD (FR3 LI) SD LI OF PARCEL A & B ABOVE DESC COMB 3-104 & 3-147 SEG H-0613 JU 1/25/96JU

#### **1.3** Physical Setting

The Site elevation is approximately 301 feet above mean sea level (Figure 2, Appendix A). As observed during a Site visit and confirmed on the USGS topographic map, the Site exhibits a surficial drainage towards the east and along much of the eastern portion of the parcel. Surficial drainage along the western and southwestern portions of the Site is toward the west or southwest. The Site lies near the axis of the north-south oriented glacial ridge along which State Route 16 is generally constructed. Significant bodies of water in the vicinity of the Site include the Puget Sound located approximately one half mile to the east-northeast, and Wollochet Bay located two miles to the southwest. The City of Gig Harbor lies along the eastern slopes of the glacial ridge, east of the axis, where elevations decrease to Sea Level at the Puget Sound. The Site lies above the uppermost portions of a somewhat poorly developed drainage corridor, which extends to the southwest toward Picnic Point and Wollochet Bay. The Site and vicinity are mapped as Quaternary Vashon Till soil, characterized locally as consisting of compact, frequently concrete-like mixture of cobbles and coarse gravel in binder of clay and silt.

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Due to the location of the Site near the axis of a broad till-covered ridge, the inferred general direction of shallow perched groundwater flow is to the east, or east-northeast towards the Puget Sound. The potentiometric surface of the shallow perched groundwater, where present, is expected to occur in subtle mimicry of the natural surface topography. Deeper regional groundwater is also expected to be present in water-bearing sands, well below the base of the glacial till aquitard. Groundwater was encountered during previous investigations at a depth of approximately 24 feet below ground surface (bgs).

#### **1.4** Previous Site Investigations

1.4.1 Phase I ESA – Aerotech, September 2014

On September 24, 2014, Aerotech Environmental Consulting, Inc., ("Aerotech") conducted a Phase I Environmental Site Assessment for the subject Property. Aerotech identified the following recognized environmental concerns (RECs):

• The present dry cleaning company has continuously occupied the northern unit of the retail strip mall building from the original completion of construction of the building in 1985. With the long term usage as a dry cleaning company of over 29 years, this usage may have environmentally impacted the subject Property.

Based on their identification of this REC, Aerotech recommended a limited and targeted subsurface investigation be conducted to determine whether the dry cleaning operations had impacted the soil and or groundwater at the Subject Site.

#### 1.4.2 Limited Phase II Environmental Investigation – Aerotech, September, 2014

On September 25, 2014, Aerotech conducted a Limited Phase II Environmental Investigation, which consisted of the completion of five soil borings and collection/analysis of ten soil samples from these borings. Concentrations of tetrachloroethylene/perchloroethylene (PCE) were documented in soils underneath the building slab at the Gig Harbor Dry Cleaners facility. The analytical results for soil samples, collected at depths between 4 and 8 feet below the concrete slab floor, indicate the presence of PCE at concentrations above the most stringent State of Washington Model Toxics Control Act ("MTCA") Method A Cleanup Levels for soil of 0.05 ppm. PCE was detected in the drum storage area at a depth of 4 feet, at concentrations of 0.30 ppm; and in soil adjoining the PCE-dry cleaning machine, at a depth of 8 feet, at concentrations of 0.059 ppm. PCE was not detected in soils analyzed near the rear door of the dry cleaning operation, or at two locations within the lateral sanitary sewer trench extending northeast of the east corner of the dry cleaning facility. Groundwater was not encountered during the environmental investigation.

After a review of the Aerotech's previous report, ECI determined that the extent of PCE impacted soil exceeding the State of Washington Model Toxics Control Act ("MTCA") Method A Cleanup Levels for soil had not been adequately delineated and additional assessment was necessary to properly characterize contaminated soils at the site. In addition, ECI noted that the previous subsurface investigation did not contact groundwater and assess the possibility of groundwater being impacted by the PCE release at the Site.

# 1.4.3 Focused Subsurface Investigation – ECI, October 2014

On October 31, 2014, ECI conducted a Focused Subsurface Investigation which consisted of advancing seven borings at the Site using direct-push drilling techniques (DPT). Four borings (B6 through B9) were completed inside the dry cleaner facility buildings adjacent to the dry cleaning units and to the south and east (Figure 3, Appendix A). Two borings (B10 and B12) were completed outside the building to the north and west, with an additional boring (B11) completed northeast of the building to assess depth to groundwater and possible groundwater impact.

The six soil borings inside and adjacent to the dry cleaner facility (B6 – B10 and B12) were completed using a one-inch diameter, two-foot long, stainless steel push-probe fitted with two-foot long single-use (disposable) acetate liner, advanced with a handheld rotary hammer. Boring B11 was completed using a two-inch diameter, four-foot long stainless steel push-probe fitted with four-foot long single-use (disposable) acetate liner advanced with truck-mounted direct-push drilling equipment.

Prior to advancing each soil boring, the drilling rods, soil samplers and groundwater sampling screen were decontaminated by washing with an aqueous detergent solution consisting of a non-phosphate detergent and potable water, and then rinsing with potable water.

During drilling, soil conditions were logged and screened continuously using visual and olfactory observations. The results of field screening and the soil conditions encountered during drilling are presented on the soil boring logs in Appendix B.

The following conclusions were supported by the findings of the October 31, 2014 investigation.

- A minor release has occurred in the area of the dry cleaning unit. Soil concentrations of PCE exceed MTCA Method A Soil Cleanup Levels inside the building to the east of the dry cleaning machine.
- PCE was not identified in groundwater at a concentration above the method detection limit, and accordingly not exceeding MTCA Method A Cleanup Levels.
- Additional investigation is necessary to adequately characterize the horizontal extent of PCEimpacted soil to the east of the dry cleaning unit at the Subject Property.

• Areas of concern were identified owing to the age of the dry cleaning equipment and the questionable storage and handling of PCE and "contact water" in the equipment area.

Based on these conclusions, ECI recommended additional investigation to further characterize and delineate the extent of PCE impacted soil underlying the Site.

#### 1.4.4 Supplemental Focused Subsurface Investigation – ECI, November 2014

On October 31, 2014, ECI conducted a Focused Subsurface Investigation (FSI) which consisted of advancing three borings at the Site using DPT. Two borings (B13 through B14) were completed on the exterior of the dry cleaners building. The third boring, B15, was placed within the adjacent rental space (tanning salon). Boring locations are depicted on Figure 3 in Appendix A.

Borings B13 and B14 were completed using a two-inch diameter, four-foot long stainless steel pushprobe fitted with four-foot long single-use (disposable) acetate liner advanced with truck-mounted direct-push drilling equipment. Boring B15, inside the tanning salon rental space was completed using a one-inch diameter, two-foot long, stainless steel push-probe fitted with two-foot long single-use (disposable) acetate liner, advanced with a handheld rotary hammer.

Prior to advancing each soil boring, the drilling rods, soil samplers and groundwater sampling screen were decontaminated by washing with an aqueous detergent solution consisting of a non-phosphate detergent and potable water, and then rinsing with potable water.

During drilling, soil conditions were logged and screened continuously using visual and olfactory observations. The results of field screening and the soil conditions encountered during drilling are presented on the soil boring logs in Appendix B.

The following conclusions were supported by the findings of the FSI:

• Soil concentrations of PCE exceed MTCA Method A Soil Cleanup Levels inside the building to the east and south of the dry cleaning machine.

Based on the results and aerial extent of PCE impacted soil, the release impacted the gravel underlying the concrete slab and migrated to the east towards the front of the building and under the tanning salon.

#### 2.0 CONCEPTUAL SITE MODEL

This section provides a summary of the conceptual site model, which includes a discussion of the contaminants of concern (COCs), the media of concern, the distribution of contamination in soil, and the potential exposure pathways for the Site.

# 2.1 Contaminants of Concern

Based on the findings of previous environmental investigations, the primary COC for the Site is PCE. Analytical results from soil sampled during Aerotech's Limited Phase II Environmental Investigation confirmed that the PCE degradation products trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2 DCE), and vinyl chloride (VC) we not present at concentrations exceeding their respective laboratory reporting limit, however they will remain as secondary COCs for the Site.

# 2.2 Media of Concern

Based on the findings of previous environmental investigations, soil is the media concern at the Site with the potential for soil vapor impacts due to contaminant adsorbtion onto soil mineral surfaces.

# 2.3 Distribution of Contamination in Soil

Based on the findings of previous environmental investigations, it appears that PCE contaminated soil is present beneath the central and eastern portion of the dry cleaning facility extending laterally approximately 10 to 20 feet beyond the eastern entrance. The vertical distribution of PCE appears confined to depths between 4 and 8 feet bgs.

#### 2.4 Exposure Pathways

The following section discusses the confirmed and potential human and ecological exposure pathways at the Site.

# 2.4.1 Soil Pathway

Potential exposure pathways for soil contamination include volatilization into soil vapor and subsequent exposure through the vapor pathway (discussed in section 2.4.3) or via the direct contact pathway through dermal contact or ingestion. Currently the full extent of contamination is covered by the foundation of the dry cleaning facility and the associated parking lot, however the risk of exposure during any future development activities will remain until the soil is removed or remediated.

#### 2.4.2 Groundwater Pathway

Previous environmental investigation on Site have reported concentrations of COCs in groundwater below the laboratory reporting limits and/or applicable cleanup levels, therefore exposure through the groundwater pathway is considered incomplete.

#### 2.4.3 Vapor Pathway

Soil vapor can become contaminated from volatilization of a PCE source adsorbed to soil mineral surfaces. The vapor pathway can be mitigated through the presence of an engineering control such as a concrete slab or ventilation system, however the potential for exposure during any future development activities will remain until the soil is removed or remediated.

#### 3.0 CLEANUP STANDARDS

This section develops Site cleanup standards for chemical constituents that were detected in affected Site media. Cleanup standards consist of:

- 1) CULs defined by regulatory criteria that are adequately protective of human health and the environment,
- 2) The point of compliance at which the CULs must be met.

#### 3.1 Cleanup Standards

The process for developing CULs consists of identifying:

- The contaminated media,
- The contaminants of concern (COC),
- The current and potential pathways of exposure,
- The current and potential receptors,
- The current and potential land use.

Based on previous investigations, CULs will be developed for the following COCs in Site soil:

- Tetrachloroethylene (PCE)
- Trichloroethylene (TCE)
- Cis-1,2 Dichloroethene (Cis-1,2 DCE)
- Vinyl chloride (VC)

#### 3.2 Cleanup Levels

Under MTCA, CULs determine the level at which a particular hazardous substance does not threaten human health or the environment. The CULs for soil are identified in this section.

MTCA regulations (WAC 173-340-704) indicate that:

"Method A may be used to establish CULs at sites that have few hazardous substances and ... sites where numerical standards are available in this chapter for applicable state and federal laws for all indicator hazardous substances in the media for which the Method A cleanup level is being used."

These soil CULs are protective of human health due to direct contact or ingestion.

The Method A Soil CULs selected for the Site are presented in Table 1 below. If no promulgated Method A CUL exists for a given chemical, the proposed cleanup level is the MTCA Method B Standard Formula Value for carcinogenic or non-carcinogenic compounds.

MTCA Cleanup Regulation 173-340-900: Table 740-1: Method A Soil Cleanup Levels for Unrestricted Land Uses or Method B Standard Formula									
		Cleanup Levels (CUL)							
Primary Contaminant of Concern	Analytical Method	Soil							
		mg/kg							
Tetrachloroethylene (PCE)	EPA 8260C	0.05							
Trichloroethylene (TCE)	EPA 8260C	0.03							
Cis-1,2-dichloroethylene (cis-1,2 DCE)	EPA 8260C	160*							
Vinyl Chloride (VC)	EPA 8260C	0.67**							

\*Method B Standard Formula Non-Carcinogenic

\*\*Method B Standard Formula Carcinogenic

#### 3.3 Point of Compliance for Soil

For soil, WAC 173-340-740 indicates that the point of compliance for soil is where the soil CULs shall be attained.

The most conservative point of compliance for soil is for the protection of groundwater. WAC 173-340-740(6)(b) states:

"For soil cleanup levels based on the protection of groundwater, the point of compliance shall be established in the soils throughout the site."

It is proposed that the point of compliance for the Site will be based on the protection of groundwater and be throughout the Site. The determination of the adequacy of soil cleanup will be based on the ability to comply with MTCA-A CULs for the Site, and to meet performance standards designed to minimize human or environmental exposure.

# 4.0 TECHNICAL COMPONENTS

#### 4.1 Responsibility for Cleanup Action

The site owner will be responsible for conducting remedial actions through the Washington State Voluntary Cleanup Program (VCP). The Subject Site is currently not covered by an Ecology Administrative Action; therefore, any state or local permits that are required will need to be obtained.

ECI has been retained by the site owner to prepare this CAP, provide a work plan for the cleanup, provide oversight during the cleanup, and provide draft and final remedial action reports.

#### 4.2 Goals and Objectives

The specific cleanup goals and objectives for the Site include the following:

- Remediation of subsurface PCE contaminated soil identified during previous environmental investigations.
- Protection of human health and the environment, including protection against direct contact or ingestion of contaminated soil while allowing for the most beneficial use of the Site by the property owners.
- Obtain a determination of No Further Action (NFA) from Ecology.

#### 5.0 GENERAL DESCRIPTION OF PROPOSED CLEANUP ACTION

This section provides a description of the cleanup action components that will be implemented in order to remediate soil beneath the Site.

#### 5.1 Project Permitting

ECI will apply for and receive the required Ecology and City of Gig Harbor building demolition and grade and fill permits. This permitting process is required based on the proposed building demolition activities and excavation / backfill activities.

#### 5.1.1 State Environmental Policy Act (SEPA)

The State Environmental Policy Act (SEPA) is legislation that allows local governments to identify and mitigate possible environmental impacts of certain projects. A SEPA review if this project may be required due to the amount of soil excavation being proposed.

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#### 5.1.2 Contained-In Determination

Under the contained-in policy, Ecology may determine that the contaminated media no longer contains a listed hazardous waste when the hazardous constituents in the media at the Subject Site are below risk-based levels. ECI will provide Ecology with statistically adequate analytical data that represents the level of contamination in the media along with a request for a contained-in determination.

# 5.2 Demolition

Site preparation will consist of either demolition of the building (northern most portion) housing the dry cleaning operation and a portion of the adjacent tanning salon or working from the interior of the building, removing the concrete floor using smaller excavation equipment and supporting the exterior walls with shoring. Both processes are generally discussed below. Finalization of the demolition plan will occur during the contractor bid process.

# 5.2.1 Health and Safety Plan (HASP)

A site-specific Health and Safety Plan (HASP) will be prepared in accordance with Chapter 296-62 of the Washington Administrative Code (WAC) and 29 CFR 1910.120 (Code of Federal Regulations). The HASP will identify potential physical and chemical hazards and specified personal protection and safety monitoring requirements. Health and safety meetings will be conducted during fieldwork at the beginning of each workday to review aspects of the HASP, and to provide an opportunity for ECI workers and contractor personnel to discuss health and safety issues or concerns. Onsite personnel associated with the field activities will be required to be familiar with and comply with the HASP's provisions. Subcontractors on site will be required to have their own HASP that identifies potential physical and chemical hazards associated with their own work activities.

# 5.2.2 Underground Utility Locating

Prior to site activities, ECI will submit a public utility locate request at least two business days prior to site activities. Also, a private utility locating service will be utilized to locate any private underground utilities that may not have been marked by the public locating service.

#### 5.2.3 Interior Limited Building Demolition

The interior of the Gig Harbor Dry Cleaning building will be emptied of all equipment and non-load baring walls including the wall separating the dry-cleaners from the adjacent tanning salon. Site utilities will be disconnected once all improvements have been removed, and the concrete floor will removed by saw cutting rather than jack hammer to lessen noise impact to the adjacent tenants. The glass facade on the building unit's northern elevation will be removed. This opening will be the primary construction entrance. The concrete and underlying soil will be removed starting in the rear (western) area moving

east. Pin pile supports will be placed on four foot centers along the perimeter of the exterior walls as needed. Where the impacted soil is within three feet of the exterior wall and excavation depth is expected to be over two feet bgs. All pin pile installation will be completed following the approval of a structural engineer.

#### 5.2.4 Building Demolition

The interior of the Gig Harbor Dry Cleaning building will be emptied of all equipment and non-load baring walls including the wall separating the dry-cleaners from the adjacent tanning salon. Site utilities will be disconnected. The exterior (roof mounted) heating, ventilating, and air conditioning equipment will be removed and stored. A structural engineer will survey the building and mark load bearing walls and roof support. Any necessary structural installation will be erected prior to demolition. The exterior walls on the north, east and west elevations and the roof covering the dry cleaning business will be removed. The concrete floor will be removed by saw cutting rather than jack hammer to lessen noise impact to the adjacent tenants. The concrete and underlying soil will be removed starting in the rear (western) area moving east.

#### 5.3 Soil Remediation

The scope of work includes the following tasks:

- Excavation and off-site disposal of contaminated soil;
- Health and Safety Plan (HASP) preparation;
- Underground Utility location (as needed);
- Sample collection and analysis;
- Data analysis and interpretation;
- Remedial excavation report preparation

#### 5.3.1 Soil Excavation

Following the concrete saw cutting, concrete and soil impacted with PCE will be excavated following the previously delineated contaminated soil outline. The excavation will be advanced to approximately 8 feet below ground surface. Soil samples, as detailed below in section 5.3.2 will be collected on a ten foot grid, with one sample being collected in each grid. Sample results will guide additional excavation activities. The excavation sampling cycle will continue until soil sample results are reported below applicable MTCA Method A CUL.

#### 5.3.2 Sampling and Analysis

During excavation activities, representative soil samples will be collected in an effort to confirm removal of the contaminated soils. Soil samples will be collected using a grid method. This will allow for the continued excavation if contaminated soil in areas where sample analysis has been reported exceeding applicable cleanup levels. Confirmation samples will be collected from each excavation sidewall and the base of the excavation. Each soil sample will be field screened a photoionization detector. Soil samples will then be placed into new, laboratory provided containers and provided a unique sample identification number. Soil samples collected for volatile organic compounds (VOC) analysis will be collected using the Ecology-required EPA Collection Method 5035. Following collection, each sample will be placed into a climate controlled container maintained at 4° Celsius until submitted to the accredited laboratory, under industry standard chain of custody protocols

Soil samples collected during the soil remediation activities will be delivered to an Ecology accredited laboratory, for analysis. The laboratory will analyze the soil samples for PCE, TCE, cis-1,2 DCE, and VC by EPA Method 8260C. Additionally if the onsite environmental professional determines, through field screening, that other contaminants may be present, additional analysis may be performed.

A chain-of-custody (COC) record will remain with all samples to the onsite or offsite laboratory. COCs will be completed and sent with the samples for each delivery to the laboratory. If multiple coolers are sent to the laboratory, COCs will be completed and sent with the samples for each cooler. The chain-of-custody form will identify the contents of each cooler and maintain the custodial integrity of the samples. Generally, a sample is considered to be in someone's custody if it is either in someone's physical possession, in someone's view, locked up, or kept in a secured area that is restricted to authorize personnel.

#### 5.3.3 Field Documentation

ECI will be documenting all field activities with the use of field logs and photographs.

# 5.3.3.1 Field Log Books

Field logbooks are intended to provide sufficient information to reconstruct events that occurred during field activities.

The following are examples of information to be included by the sampler(s) in a field logbook:

- Project name and location;
- Name, date, and time of entry;
- Names and responsibilities of field crew members;

- Name and titles of any site visitors involved in or actively observing the sampling;
- Descriptions of deviations from the sampling procedures and any problems encountered;
- Weather information including air temperature and recent precipitation;
- Date and time of sample collection;
- General observations, including the setting / features surrounding the sampling location, topography, etc.; and
- Work start and stop times.

#### 5.3.3.2 Site Photographs

Photographs will be taken at each sampling location to document field conditions, including the features and structures surrounding the sample locations. Photographs also will provide a record of the spatial relationships between the sampled area and surrounding features and structures

#### 5.4 Site Restoration

Following removal activities of the contaminated soil, the excavation will be backfilled with an engineered structural fill material capable of 95% compaction. The backfill will be placed in twelve inch lifts and compacted using a mechanical compactor. Backfill placement final grade will meet the existing concrete subgrade. Compaction testing will be completed by a properly licensed testing company.

# 6.0 APPLICABLE LAWS

MTCA requires that all cleanup actions conducted under MTCA shall comply with applicable state and federal laws (WAC 173-340-710(1). MTCA defines applicable state and federal laws to include legally applicable requirements and those requirements that are relevant and appropriate. Collectively, these requirements are referred to as applicable or relevant and appropriate requirements (ARARs). This section provides a brief overview of potential ARARs for the site cleanup. The primary ARAR is the MTCA cleanup regulation (WAC 173-340).

Other than MTCA, the primary ARARs that may pertain to the cleanup action include the following:

- Federal Maximum Contaminant Levels (40 CFR Part 141), developed under the Safe Drinking Water Act;
- Washington Clean Air Act, Chapter 70.94 RCW;

- Solid and Hazardous Waste Management (Chapter 70.105 RCW; and the accompanying Dangerous Waste regulations (WAC 173-303);
- State of Washington Solid Waste Regulations (WAC 173-350 and WAC 173-351);
- The Federal Resource Conservation and Recovery Act (RCRA) including the Land Disposal Restrictions (40 CFR 260 282);
- Washington Industrial Safety and Health Act (RCW 49.17) and the Federal Occupational Safety and Health Act (29 CFR 1910, 1926);
- State Environmental Policy Act SEPA (Chapter 43.21C RCW and WAC 197-11);
- Construction Stormwater General Permit (Chapter 90.48 RCW) (33 U.S.C. Section 1251 et seq.).

State and federal groundwater and air quality criteria are considered in the development of CULs. State Dangerous Waste Regulations may be applicable to contaminated soil removed from the site during cleanup activities. State Environmental Policy Act requirements will be addressed concurrent with the site CAP to the degree applicable for the selected cleanup action.

# 7.0 PUBLIC PARTICIPATION / COMMUNICATION

Consideration of public concerns is an inherent part of the Site cleanup process under MTCA (see WAC 173-340-600). Ecology is responsible for providing public notice and the opportunity for public comments on this CAP per WAC 173-340-600(13), if required. The formal review and comment period is approximately 30 days. After review and consideration of public comments, the contents of this document may be revised accordingly.

# 8.0 PROJECT REPORTING

Upon completion of the cleanup action and follow-up confirmation sampling, a draft Remedial Action Completion Report will be prepared for submittal to Ecology documenting the cleanup action activities and the results of confirmation sampling. If the confirmation sampling results adequately demonstrate that cleanup has successfully remediated soil to below the Site CULs, the report will include or be accompanied by a request for an NFA determination from Ecology.

# 9.0 USE OF DOCUMENT

This CAP has been prepared for Orlandini and Waldron, their agents, and/or assigns for the property located at 6978 Kimball Drive in Gig Harbor, Washington. No other party is entitled to rely on the

information, conclusions, and recommendations included in this document without the express written consent of Orlandini and Waldron.

# **10.0 REFERENCES**

Guidance documents were reviewed and obtained from the following sources:

- Washington Department of Ecology (Ecology), Southwest Regional Office, Records
- Tacoma-Pierce County Health Department (TPCHD) Waste Disposal (http://www.tpchd.org/environment/waste-management/waste-disposal-authorization)
- Pierce County Assessor Website (http://www.co.pierce.wa.us/Index.aspx?NID=91)
- Washington State Department of Ecology Contained In Determination (http://www.ecy.wa.gov/programs/hwtr/determinations/index.html)

# **Appendix A**

**Project Figures** 

Figure 1: Site Location Map Figure 2: Site Topographic Map Figure 3: Sample Location Map







N Not To Scale

**Site Topographic Map** Cleanup Action Plan 6978 Kimball Dr Gig Harbor, Washington 98335

Date:	May 5, 2015	Figure No.:
Completed By	K. Spencer	
Reviewed By.:	S. Spencer	
Version:	ECI-001	
Project No.:	0547-03	Sheet 02 of 03
ECI	environment	al Services



# Appendix B

ECI Boring Logs



FCI environmental services				ental serv	/ices	Project: Gig Harbor Dry Cleaners Boring ID:	<b>B6</b>	
www.ecocononline.com					ne.com	Location: 6978 Kimball Drive, Gig Harbor, Washington		
						Client: Orlandini & Waldron, PS	0547-01	
Date	Start/Fir	ish:	10/31/201	4		Drilling Method: Direct Push Unified Soil Class GW WELL-GRADED GRAV	ification System EL, FINE TO COARSE GR	RAVEL
Log	ged By:		Kyle Spen	icer		Auger ID/OD:	AVEL	
Che	cked By:		K. Craig K	lein		Borehole ID/OD:	FINE TO COARSE SAND	D
Cont	ractor:		Standard	Environmental	Probe	Sampler: Acetate Liner	ND	
Ope	rator:		Chris Ros	S		Hammer Wt./Fall:		
Bori	ng Locati	on:	Adjaent to	PCE drum		Ground Elevation:	NIC CLAY	
Coo	rdinates:					Water Depth: NA	CITY, ELASTIC SILT	
Wea	ther:		Cloudy, R	ain, 50 Degree	es	Boring Depth: 13' OH ORGANIC CLAY, ORG.	ANIC SILT	
Depth (ft bgs)	Sample No.	Time	Sample Condition	PID Reading	Remarks	Soil and Rock Description	Unified Classification Graphical	Representation
	I       I         B6-4       I         I       I <t< th=""><th></th><th>Good Good Good Good Good Good Good Good</th><th></th><th></th><th>Sand with gravel, fine to medium grained, light brown, loose, dry Sand with gravel, fine grained, light brown, loose</th><th>SP</th><th></th></t<>		Good Good Good Good Good Good Good Good			Sand with gravel, fine to medium grained, light brown, loose, dry Sand with gravel, fine grained, light brown, loose	SP	
- - <u>Note</u>	<u>s:</u>						Page	

E	CI	on	ironm	antal con	vicos	Project: Gig Harbor Dry Cleaners	B7	7	
E		env	WITCHING	ww.ecocononli	ne.com	Location: 6978 Kimball Drive, Gig			
						Client: Orlandini & Waldron, PS	0547-	-01	
Date	Start/Fi	nish:	10/31/201	4		Drilling Method: Direct Push	ification System	m	
Log	ned By:		Kyle Spen	cer		Auger ID/OD:	/el, fine to coars Ravel	SE GRAVEL	
Che	cked Bv:		K. Craio K	lein		Borehole ID/OD:		04115	
Con	tractor:		Standard	Environmental	Probe	Sampler: Acetate Liner	ND	SAND	
Ope	rator:		Chris Ros	s		Hammer Wt./Fall:			
Bori	ng Locat	ion:	Adjacent t	o cleaning ma	chine	Ground Elevation:			
Coo	rdinates:					Water Depth: NA	ICITY, ELASTIC SILT		
Wea	ther:		Cloudy, R	ain, 50 Degree	es	Boring Depth: 12'	SANIC SILT		
				_				no	
Depth (ft bgs	Sample No.	Time	Sample Condition	PID Reading	Remarks	Soil and Rock Description	Unified Classificatior	Graphical Representatio	
- 4 - - - - - - - - - - - - - - - - - -	B7-8 B7-8 B7-12		Good Good Good Good Good Good Good Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP		
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FCI environmental services					vices	Project: Gig Harbor Dry Cleaners Boring ID:	В	8
www.ecocononline.com					ine.com	Location: 6978 Kimball Drive, Gig Harbor, Washington	_	•
						Client: Orlandini & Waldron, PS	0547	7-01
Date Start/Finish: 10/31/2014						Drilling Method: Direct Push Unified Soil Class	ification Syst	em RSE GRAVEL
Logo	ed By:		Kyle Spen	cer		Auger ID/OD:	AVEL	
Cheo	ked By:		K. Craig K	lein		Borehole ID/OD:		
Cont	ractor:		Standard	Environmental	Probe	Sampler: Acetate Liner	ND	
Ореі	rator:		Chris Ros	S		Hammer Wt./Fall:		
Bori	ng Locat	on:	Bathroom					
Cool	dinates:					Water Depth: NA	CITY, ELASTIC SIL	.T
Wea	ther:		Cloudy, R	ain, 50 Degree	S	Boring Depth: 8'	ANIC SILT	
epth (ft bgs)	ample No.	ime	ample ondition	ID Reading	emarks	Soil and Rock Description	nified lassification	iraphical epresentation
	S	F	ပလ	<u>۵</u>	Ř			<u>0</u> <del>2</del>
-								
-	B8 /		Good			Sand with gravel fine to medium grained light brown loose dry	SD	
- 1	D0-4		Guu			Sand with gravel, line to medium grained, light brown, loose, dry	55	
8	B8-8		Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP	
12								
1 <sup>2</sup> -								
16								
-								
-								
-								
]								
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	CI		ironm	antal con	linon	Project: Gig Harbor Dry Cleaners	: B9
C C C C C C C C C C C C C C C C C C C					ine.com	Location: 6978 Kimball Drive, Gig Harbor, Washington	
						Client: Orlandini & Waldron, PS	0547-01
Date	Start/Fi	nish:	10/31/201	4		Drilling Method: Direct Push Unified Soil	Classification System
Logo	ged By:		Kyle Spen	cer		Auger ID/OD:	DED GRAVEL
Cheo	ked By:		K. Craig K	lein		Borehole ID/OD:	EL ) SAND, FINE TO COARSE SAND
Cont	ractor:		Standard	Environmental	Probe	Sampler: Acetate Liner	DED SAND
Ope	rator:		Chris Ros	s		Hammer Wt./Fall:	
Bori	ng Locat	tion:	Inside, 15	east of machin	ne	Ground Elevation:	ORGANIC CLAY
Cool	dinates:					Water Depth: NA	PLASTICITY, ELASTIC SILT
Wea	ther:		Cloudy, R	ain, 50 Degree	es	Boring Depth: 8' OH ORGANIC CLAY	Y, ORGANIC SILT
Jepth (ft bgs)	sample No.	lime	Sample Condition	olD Reading	Remarks	Soil and Rock Description	Jnified Classification Graphical Representation
4 4 8 12	B9-4 B9-8		Good			Sand with gravel, fine to medium grained, light brown, loose, dry Sand with gravel, fine to medium grained, light brown, loose, dry	SP
	S:						
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FCI environmental services						Project: Gig Harbor Dry Cleaners Boring ID:	B	10
www.ecocononline.com						Location: 6978 Kimball Drive, Gig Harbor, Washington	054	7 04
						Client: Orlandini & Waldron, PS	054	7-01
Date	Start/Fi	nish:	10/31/201	4		Drilling Method: Direct Push GW WELL-GRADED GRAV	ification Syst (EL, FINE TO COA	em RSE GRAVEL
Log	ged By:		Kyle Spen	icer		Auger ID/OD:	AVEL	
Che	cked By		K. Craig K	lein		Borehole ID/OD:	, FINE TO COARS	E SAND
Con	tractor:		Standard	Environmental	Probe	Sampler: Acetate Liner	ND	
Оре	rator:		Chris Ros	S		Hammer Wt./Fall:		
Bori	ng Loca	tion:	Outside, v	vest of building	1	Ground Elevation:		Ŧ
Coo	rdinates	:				Water Depth: NA	ICITY, FAT CLAY	_1
Wea	ther:		Cloudy, R	ain, 50 Degree	es I	Boring Depth: 12'		
Depth (ft bgs)	Sample No.	Time	Sample Condition	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Graphical Representation
4	B10-4		Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP	
8	B10-8		Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP	
12	B10-12		Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP	
16	B12-S16	1:20				Sand and gravel, strong odor and sheen	SW	
-								
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FCI environmental services						Project: Gig Harbor Dry Cleaners Borina ID:	B1	12
					ine.com	Location: 6978 Kimball Drive, Gig Harbor, Washington		
						Client: Orlandini & Waldron, PS	0547	7-01
Date	Start/Fi	nish:	10/31/201	4		Drilling Method: Direct Push Unified Soil Class GW WELL-GRADED GRAV	ification System (EL, FINE TO COAR	em RSE GRAVEL
Log	ged By:		Kyle Spen	cer		Auger ID/OD:	RAVEL	
Chee	cked By		K. Craig K	lein		Borehole ID/OD:	, FINE TO COARSI	E SAND
Cont	ractor:		Standard	Environmental	Probe	Sampler: Acetate Liner	ND	
Ope	rator:		Chris Ros	s		Hammer Wt./Fall:		
Bori	ng Loca	tion:	Outside, n	orth of building	9	Ground Elevation:	ANIC CLAY	
Coo	rdinates					Water Depth: NA	CITY, ELASTIC SIL ICITY, FAT CLAY	.т
Wea	ther:		Cloudy, R	ain, 50 Degree	S	Boring Depth: 6'	ANIC SILT	
Depth (ft bgs)	Sample No.	Time	Sample Condition	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Graphical Representation
-								
-								
4	B12-4		Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP	
	B12-6		Good			Sand with gravel, fine to medium grained, light brown, loose, dry	SP	
_								
8 -						4		
-								
12								
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1		w.ecocononlir	ices ne.com	Location:6978 Kimball Drive, Harbor, WashingtonGigClient:Orlandini & Waldron, PS	Pro	ject Number:	<b>D</b> 054	<b>I 3</b> 7-01
Date Start/Finish:	11/18/2014			Drilling Method: Direct Push		Unified Soil Classification System		
Logged By:	Brad Reilly			Auger ID/OD:	S	GP POORLY-GRADED GR/ GM SILTY GRAVEL	AVEL	
Checked By:	K. Craig Kle	ein		Borehole ID/OD:	/E SOIL	GC CLAYEY GRAVEL	FINE TO COARS	E SAND
Contractor:	Standard Er	nvironmental	Probe	Sampler: Acetate Liner	-COHESIV	SP POORLY-GRADED SAN SM SILTY SAND	ND	
Operator:	Chris Ross			Hammer Wt./Fall:	NON	SC CLAYEY SAND		
Boring Location:	Outside, nor	rth of building	1	Ground Elevation:	OILS	CL CLAY OL ORGANIC SILT, ORGAI	NIC CLAY	
Coordinates:				Water Depth: 20.5'	SIVE SC	MH SILT OF HIGH PLASTIC CH CLAY OF HIGH PLASTI	CITY, ELASTIC SII CITY, FAT CLAY	_T
Weather:	Clear, dry, 3	35 Degrees		Boring Depth: 24'	COHE	OH ORGANIC CLAY, ORGA PT PEAT	ANIC SILT	
Depth (ft bgs) Sample No. Time	Sample Condition	PID Reading	Remarks	Soil and Rock Description	ı		Unified Classification	Graphical Representation
4       B13-4       12:30p         4       B13-4       12:30p         8       B13-8       12:45p         12       B13-12       12:55p         13       14       14         14       14       14         15       14       14         14       14       14         15       14       14         16       14       14         17       14       14         18       14       14       14         19       14       14       14         10       14       14       14         112       14       14       14         113       14       14       14         114       14       14       14         115       14       14       14 <th>Good Good Good Good Good Good Good Good</th> <th></th> <th></th> <th>Sand with gravel, fine to medium grained, light bro Sand with gravel, fine to medium grained, gray, loo Sand with gravel, fine to medium grained, gray, loo</th> <th>own, ose,</th> <th>loose, dry dry dry</th> <th>SP SP</th> <th></th>	Good Good Good Good Good Good Good Good			Sand with gravel, fine to medium grained, light bro Sand with gravel, fine to medium grained, gray, loo Sand with gravel, fine to medium grained, gray, loo	own, ose,	loose, dry dry dry	SP SP	



ECI		vices ne.com	Project:Gig Harbor Dry CleanersLocation:6978 Kimball Drive,GigHarbor, WashingtonGigClient:Orlandini & Waldron, PS	B Pro	oring ID:	B <sup>2</sup> 054	<b>14</b> 7-01
Date Start/Finish:	11/18/2014		Drilling Method: Direct Push	İ.	Unified Soil Classi	fication Syst	tem RSE GRAVEL
Logged By: Brad Reilly		Auger ID/OD:	GP POORLY-GRADED GRAVEL				
Checked By: K. Craig Klein		Borehole ID/OD:		FINE TO COARS	E SAND		
Contractor: Standard Environmental Probe		Sampler: Acetate Liner	SP POORLY-GRADED SAND				
Operator: Chris Ross		Hammer Wt./Fall:	SC     CLAYEY SAND       ML     SILT				
Boring Location: Outside, east of building		Ground Elevation:	CL CLAY OL ORGANIC SILT, ORGANIC CLAY MH SILT OF HIGH PLASTICITY, ELASTIC SILT CH CLAY OF HIGH PLASTICITY, FAT CLAY				
Coordinates:		Water Depth: 21'			T		
Weather:	Clear, dry, 35 Degrees		Boring Depth: 24'	COHE	OH ORGANIC CLAY, ORGA PT PEAT	NIC SILT	
Depth (ft bgs) Sample No. Time	Sample Condition PID Reading	Remarks	Soil and Rock Description	n		Unified Classification	Graphical Representation
4       B14-4       1:10p         4       B14-4       1:10p         8       B14-8       1:15p         12       B14-12       1:25p         12       B14-12       1:25p         12       B14-12       1:25p         112       112       112         12       112       112         12       112       112         13       110       110         14       110       110         15       110       110         16       110       110         17       110       110         18       110       110         19       110       110         10       110       110         10       110       110         10       110       110         10       110       110         110       110       110         1110       110       110         1110       110       110         1110       110       110         1110       110       110         1110       110       110         1110       110	Good           Good		Sand with gravel, fine to medium grained, light broom Sand with gravel, fine to medium grained, gray, low Sand with gravel, fine to medium grained, gray, low	ose,	loose, dry dry dry	SP SP	
Notes:							



ECI		Project:Gig Harbor Dry CleanersLocation:6978 Kimball Drive, Harbor, WashingtonGig Gig Harbor, WashingtonClient:Orlandini & Waldron, PS	Boring ID: B1 Project Number: 0547-		<b>15</b> 7-01	
Date Start/Finish:	11/18/2014	Drilling Method: Direct Push	Unified Soil Class	ification Syst	RSE GRAVEL	
Logged By: Brad Reilly		Auger ID/OD:	GP POORLY-GRADED GRAVEL			
Checked By: K. Craig Klein		Borehole ID/OD:			COARSE SAND	
Contractor: Standard Environmental Probe		Sampler: Acetate Liner	mpler: Acetate Liner			
Operator: Chris Ross		Hammer Wt./Fall:	Š     SC     CLAYEY SAND       ML     SILT			
Boring Location: Inside, north wall adjacent property		Ground Elevation:	CL CLAY OL ORGANIC SILT, ORGANIC CLAY MH SILT OF HIGH PLASTICITY, ELASTIC SILT CH CLAY OF HIGH PLASTICITY, FAT CLAY			
Coordinates:		Water Depth: N/A			T	
Weather:	Clear, dry, 35 Degrees	Boring Depth: 12'	면 OH ORGANIC CLAY, ORG	ANIC SILT		
Depth (ft bgs) Sample No. Time	Sample Condition PID Reading Remarks	Soil and Rock Description	- Unified Classification Graphical Representation			
4         B15-4         2:15p           4         B15-4         2:15p           8         B15-8         2:35p           12         B15-12         3:25p           13         1         1           14         1         1           15         1         1           14         1         1           15         1         1           15         1         1           16         1         1           17         1         1           18         1         1           19         1         1           10         1         1           11         1         1           12         1         1           13         1         1           14 <th>Image: state intermediate in</th> <th>Sand with gravel, fine to medium grained, light broom solution of the second se</th> <th>own, loose, dry ose, dry ose, dry</th> <th>SP SP</th> <th></th>	Image: state intermediate in	Sand with gravel, fine to medium grained, light broom solution of the second se	own, loose, dry ose, dry ose, dry	SP SP		

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