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

February 15, 2018

Electronic Copy

Mr. Joel Richter
Pedigo Products
4000 SE Columbia Way
Vancouver, WA 98661

Re: Further Action at the following Site:

- **Site Name:** Portco Corp Pedigo Products
- **Site Address:** 4000 SE Columbia Way, Vancouver, 98661-5578, Clark
- **Facility/Site No.**: 30759
- **Cleanup Site No.:** 3802
- **VCP Project No.:** SW1619

Dear Mr. Richter:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Portco Corp Pedigo Products facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Ecology has determined that further remedial action is necessary to clean up 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 its 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 releases:

- Gasoline range total petroleum hydrocarbons (TPH-G) into the Soil and Groundwater.

- Diesel range and oil range total petroleum hydrocarbons (TPH-D and TPH-O) into the Soil and Groundwater.
- Benzene, toluene, ethylbenzene, and xylene (BTEX) constituents into the Soil and Groundwater.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology. A parcel 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 is based on the information contained in the following documents:

1. AGRA Earth & Environmental, Inc. (AEE), *Independent Remedial Action Report (IRAP); Former Portco Property; 4000 and 4200 S.E. Columbia Way; Vancouver, Washington*, June 1996.
2. AEE, *Phase I Environmental Site Assessment; Pedigo Products Property; 4000 S.E. Columbia Way; Vancouver, Washington*, June 1995.
3. AEE, *Geoprobe Groundwater Investigation; 4200 S.E. Columbia Way; Vancouver, Washington*, April 1995.
4. CH2M Hill, *Letter to Mr. Jerry King; City Attorney; City of Vancouver, Re: Additional Soil Excavation at Former Tank T-2 Location; Former PORTCO Site; S.E. Marine Parkway; Vancouver, Washington*, March 16, 1993.
5. CH2M Hill, *Letter to Mr. Richard Walker; Leaking Underground Storage Tank Site Manager; Department of Ecology, Subject: Portco Property Environmental Assessments; 5200 Columbia Way, Vancouver, Washington*, April 10, 1990.
6. CH2M Hill, *Letter to Mr. Victor Ehrlich, P.E.; City Engineer; City of Vancouver, Subject: Summary of Phase I and II Portco Property Environmental Surveys*, April 3, 1990.
7. CH2M Hill, *Phase II Environmental Assessment Survey; Portco Property*, March 1990.
8. Lambier Stevenson Engineers (LSE), *Phase II Site Assessment of the Portco Property; Vancouver Washington*, December 11, 1989.
9. CH2M Hill, *Technical Memorandum to the City of Vancouver; Phase I Environmental Survey; Eastside Treatment Plant Expansion; Expansion Option A*, September 22, 1989.

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. Some documents may be available on Ecology's web page at https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx.

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 **further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is not sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**. Relevant figures referenced below are included in **Enclosure A**.

The reports submitted;

- Do not demonstrate that the horizontal and vertical extents of petroleum contaminated soil (PCS) or groundwater have been adequately characterized as required by WAC 173-340-350(7).
    - The Site is a subset of a larger historical site that was usually referred to as the Portco Property. Former underground storage tanks (UST) and locations associated with the Site were not identified prior to requesting a determination from Ecology. Ecology has determined from the property locations and parcel boundaries that the USTs listed below were likely located on the Site property. Tank 6 is included in this list because its location was never adequately demonstrated to Ecology. An assessment of all the tanks associated with the historical Site is included in **Enclosure A**. A Site Location Map and a Parcel Map are included in **Enclosure A**.

        - Tank 1 (T1)
        - Tank 3 (T3)
        - Tank 6 (T6)
        - Tank 2 (T2)
        - Tank 4 (T4)

        Tank locations are shown in CH2M Hill's Figure 1 and Figure 1 (Cont.) included in **Enclosure A**.
- Do not demonstrate that the Site was sampled for all the relevant hazardous substances listed in MTCA Table 830-1.

- Demonstrates that dilution and dispersion (WAC 173-340-360(2)(g)) were used as a remediation alternative[1,2].
- Demonstrates that contaminated soils were re-used[1,2] without demonstrating that they meet the soil re-use criteria outlined in Chapter 12 of the Guidance for Remediation of Petroleum Contaminated Sites[3].
- Do not make any assessment of terrestrial ecological receptors (WAC 173-340-7490).

The exposure pathways for the Site as Ecology currently understands them are;

Soil-Direct Contact:
Complete. Contaminated soil in excess of applicable cleanup levels (CULs) may still be present at depths shallower than 15 feet below ground surface (bgs). Contaminated soils were reused as backfill for many of the UST excavations on the Site. The status of Tank 6 and the presence or absence of any contaminated soils associated with Tank 6 have not been sufficiently determined.

Soil-Leaching:
Complete. Groundwater has not been assessed for the Site.

Soil-Vapor:
Complete. Soil vapor has not been assessed for the Site. Soil and groundwater will need to be assessed before a Tier I vapor intrusion (VI) assessment can be conducted.

Groundwater:
Complete. Groundwater has not been assessed for the Site.

Ecological:
Complete. The ecological pathway has not been assessed for the Site. A Terrestrial Ecological Evaluation (TEE) needs to be completed and submitted to Ecology.

Based on a review of the available information, Ecology has the following comments;

1. Because the Site was not fully assessed prior to remediation activities and contaminated soils were potentially reused as backfill in some or all of the excavations on the Site, a Site assessment will need to be performed. The Site assessment should target the former UST locations, and sampling should include the applicable hazardous substances listed on MTCA Table 830-1.

[1] CH2M Hill, March 1990, p. 8, p. 15.
[2] CH2M Hill, March 1990, included memorandum dated January 30, 1990, Re: Spoils Pile, Tank #7.
[3] Washington Department of Ecology, Guidance for Remediation of Petroleum Contaminated Sites, Publication No. 10-09-057, Revised June 2016. https://fortress.wa.gov/ecy/publications/SummaryPages/1009057.html

If Method A will be the proposed CULs, the following hazardous substances should be included as part of any sampling plan in all media;

- BTEX,
- Methyl tert-butyl ether (MTBE),
- 1-2 Dibromoethane (EDB),
- 1-2 dichloroethane (EDC),
- Carcinogenic polyaromatic hydrocarbons (cPAH),
- Polychlorinated biphenyls (PCB),
- Halogenated Volatile Organic Compounds (VOC),
- TPH-G,
- TPH-D/O, and
- Lead

If Method B or Method C CULs are going to be proposed, naphthalenes[4], as well as extractable petroleum hydrocarbons (EPH) and volatile petroleum hydrocarbons (VPH) will also need to be included as part of any sampling plan in all media.

Because it cannot be determined where specific soils where used as backfill for specific excavations, the entire Site will need to be assessed for all hazardous substances.

2. Limited groundwater sampling was conducted on the neighboring property (Portco Corporation, 4200 S.E. Columbia Way, FSID 98588242) that showed the presence of tetrachloroethene (PCE) on that site. Because of the PCE on the neighboring property, Ecology recommends sampling for PCE and related daughter products in all sampled media in addition to the hazardous substances listed on MTCA Table 830-1. The primary daughter products include trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-DCE), trans-1,2-dichloroethylene (trans-DCE), and vinyl chloride (VC).
3. Although it is stated that "Tank No. 6 is also presumed to have been removed from the Site"[5], its location and status has not been adequately demonstrated to Ecology. Ecology could not determine which property that Tank 6 was located on, therefore it will need to be determined if Tank 6 was located on this Site.

[4] Naphthalenes include naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene.
[5] Lambier Stevenson Engineers, December 11, 1989, p. 6.

If the location of Tank 6 was on this Site, it will need to be determined if the tank has actually been removed and if any contamination remains in the soil and groundwater in the vicinity of the tank's current or former location.

4. After the Site has been defined in soil and groundwater, a Tier I VI assessment will need to be completed to determine if contamination is present in soil vapor beneath the on-Site building, any nearby neighboring buildings, and in the indoor air inside any of the applicable buildings. Ecology's guidance on vapor intrusion assessments can be found at the link below.
   - https://fortress.wa.gov/ecy/publications/SummaryPages/0909047.html
5. Submit a Terrestrial Ecological Evaluation (TEE). A TEE is required for the Site. Information on performing a TEE can be found at Ecology's web site linked below. Please include any necessary supporting documentation when submitting the TEE.
   - https://www.ecy.wa.gov/Regulations-Permits/Guidance-technical-assistance/Terrestrial-ecological-evaluation
6. If PCS will be left in place beneath a building or other structure, an Environmental Covenant will be necessary to obtain a No Further Action (NFA) for the Site. For guidance on establishing an Environmental Covenant, please see Procedure 440A at Ecology's web site;
   - http://www.ecy.wa.gov/programs/tcp/policies/tcppoly.html
7. In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Independent Remedial Actions shall be submitted simultaneously in both a written and electronic format. For additional information regarding electronic format requirements, see the website linked below. According to the policy, any reports containing sampling data that are submitted for Ecology review are considered incomplete until the electronic data has been entered. Please ensure that data generated during on-site activities is submitted pursuant to this policy. Data must be entered into EIM at the time any report is submitted requesting an opinion on the sufficiency of the action under the VCP. Be sure to submit all soil and groundwater data collected to date, as well as any future data, in this format. Data collected prior to August 2005 (effective date of this policy) is not required to be submitted; however, you are encouraged to do so if it is available.
   - http://www.ecy.wa.gov/eim
8. All future reports containing geologic, hydrogeologic, or engineering work should be submitted under the seal of a licensed professional as required in RCW 18.43 and RCW 18.220. Specifics on what should be sealed by the licensed professional can be found in WAC 308-15-075, and in the Guidance for Remediation of Petroleum Contaminated Sites[3] section 4.3.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site do not meet the substantive requirements of MTCA.

As of the AEE June 1996 report, the Site is being compared to 1990 CULs. No current CULs have been proposed to Ecology.

Standards points of compliance are currently being used for the Site.

- The point of compliance for protection of groundwater is established in the soils throughout the Site.
- For soil cleanup levels based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the point of compliance is established in the soils throughout the Site from the ground surface to 15 feet below ground surface (bgs).
- The point of compliance for the groundwater is 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 point of compliance for indoor air and soil gas is throughout the Site.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site does not meet the substantive requirements of MTCA.

Compliance with Site Cleanup standards cannot be determined because Site characterization is not sufficient to establish the Site cleanup standards. Site characterization will need to be completed before a cleanup option and Site cleanup standards can be established. Cleanup actions performed will need to meet the minimum cleanup requirements in WAC 173-340-360(2).

4. Cleanup.

Ecology has determined the cleanup you performed does not meet any cleanup standards at the Site.

Cleanup actions at the Site to date have included the removal of Tanks 1, 2, 3, and 4 with contaminated soil re-used as backfill in some or all of the excavations. The location and status of Tank 6 has not been demonstrated to Ecology.

Compliance with Site Cleanup standards cannot be determined because Site characterization is not sufficient to establish the Site cleanup standards. Site characterization will need to be completed before a cleanup option and Site cleanup standards can be established.

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 liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you 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 choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm.

If you have any questions about this opinion, please contact me by phone at (360) 407-6437 or at aaren.fiedler@ecy.wa.gov.

Sincerely,

Aaren Fiedler
SWRO Toxics Cleanup Program

AF: kb

By Certified Mail: [91 7199 9991 7037 7520 0858]

Enclosures: A – Description, Diagrams, and Tables of the Site

cc: Colby Hunt, GeoDesign, Inc.
Stephanie Bussell, Ecology
Nicholas Acklam, Ecology
Deirdra Hahn, Ecology

Enclosure A

Description, Diagrams and Tables of the Site

Site Description

Site Location, Use, and Contamination:
The Site, identified as Portco Corp Pedigo Products is located at 4000 S.E. Columbia Way Vancouver, 98661-5578, Clark County. This is a portion of a larger historical site that included 10 USTs and one AST. The former locations of these tanks are currently located at three separate addresses and on 4 or 5 separate parcels. The 4000 S.E. Columbia Way address consists of Clark County parcel 37910173 (0173). The other two locations consist of 4200 S.E. Columbia Way and consists of Clark County parcel 37910174 (0174), and may also include Clark County parcel 37910115 (0115); and 4600 and 4650 S.E. Columbia Way which comprises multiple parcels. Only two of these multiple parcels are considered by Ecology to have potentially had relevant former USTs, Clark County parcel 37910166 (0166) and Clark County parcel 37917205 (7205). 4200 S.E. Columbia Way was the original address given for the larger historical site. A map showing the location of each parcel is included in the Site Diagrams section (Ecology Figure 2).

Many industrial and commercial business have operated on the Site and the other associated locations. The tanks have been reported with different uses depending on the report. The tanks that Ecology believes are associated with the 4000 S.E. Columbia Way location are T1, T2, T3, and T4. The location of T6 is not known to Ecology and may have been associated with this Site. All the tanks associated with the Site are reported to have contained some type of petroleum product including furnace and boiler fuel, No. 1, 2, or 4 Fuel, diesel, boiler fuel, gasoline, leaded gasoline, and unknown fuel. Specific reported uses are summarized in Ecology Table 1 included in the Site Tables section. All of the tanks (UST and AST) are being reported as removed, though one tank (T6) is believed to have been removed prior to the work of removing the other tanks.

The area is a large industrial area known as Columbia Way that is located between the Columbia River and Washington Highway 14 (Lewis and Clark Highway). East of the Site is the 4200 S.E. Columbia Way location (Site Name is Portco Corporation, FSID 98588242), and a City of Vancouver facility that consists of the Water Resources Education Center, a Sewer System and Wastewater Treatment Facility, and a Vancouver Engineering Services Department building. The City of Vancouver facility includes the 0166 and 7205 parcels. South of the Site is the Christensen Shipyards and a City of Vancouver park called Marine Park. West of the Site is the Columbia River Logistics building. North of the Site is Washington Highway 14. Across Highway 14 is Municipal Water Supply Well and EPA Superfund Site (Site Name is Vancouver City Blandford Station 4, FSID 202). Site figures and an Ecology Site Location Map are included in the Site Diagrams section.

Geology:
The Site is comprised of Columbia River dredge material from World War II dredging activities[6]. Ecology assumes that this dredge material makes up the near surface deposits.

[6] CH2M Hill, September 22, 1989, p. 4.

Additionally the Site is comprised of Columbia River fluvial deposits that are predominantly sand with variable lenses of gravelly and silty soils and Columbia River Basalts at depth[7]. The Columbia River is approximately 0.34 miles south of the Site. Although the groundwater flow direction has not been determined for this Site, it is likely towards the Columbia River.

[7] Lambier Stevenson Engineers, December 11, 1989, p. 14.

Site History

Initial Environmental Site Assessment (1989)
CH2M Hill conducted a Phase I (PI) Environmental Site Assessment (ESA) on a property located at 4200 Columbia Way, which at the time included this Site currently located at 4000 Columbia Way. Multiple environmental concerns were identified during the PI process including seven USTs, two wells, miscellaneous generated wastes, rinse water discharge from an ink printer, trash piles at the surface that contained unknown materials, fluorescent lighting ballasts that may contain polychlorinated biphenyls (PCB), and asbestos containing materials used in the construction of the buildings (i.e. tiles, roofing materials, insulation). At the time, the two wells were incorrectly identified as process water injection wells. It was reported that the wells had previously been sampled by Rittenhouse-Zeman and Associates and showed a tetrachloroethene (PCE) concentration of 1.2 µg/L in one of the wells.

Because the previous PI had identified multiple environmental concerns, including seven USTs, Lambier Stevenson Engineers (LSE) was directed to conduct a Phase II (PII) ESA for Portco. This ESA was also conducted on the Portco property located at 4200 Columbia Way, which at the time included this Site currently located at 4000 Columbia Way. During the PII, two additional UST were identified bringing the UST count for the Site to nine. It was also indicated that Tank #6 (T6) was believed to have been removed prior to this PII[8]. Sampling was done in soils only and included VOCs, metals, polychlorinated biphenyls (PCB) and TPH depending on location. Tank #2 (T2), Tank #5 (T5), and Tank #7 (T7), were determined to have TPH present in their surrounding soils. Tank locations and sampling locations were not presented as part of the PII report. Two wells were reported as being capped and sealed, though three total wells were identified on the Site.

An Additional PII was conducted by CH2M Hill for the City of Vancouver. The CH2M Hill and LSE PII ESAs appear to have been done in tandem. CH2M Hill identified 10 tanks on the Site, though the tank identified as T11 is an aboveground storage tank (AST). Tank 6 (T6) is referenced as part of an earlier PI survey, though it is stated "that no visual evidence of the tank was found during [a] site visit"[9]. CH2M Hill also stated that three water wells were abandoned. USTs 1, 3, 4, 7, 8, 9, and 10, and AST 11 were reported as removed. USTs 2, and 5 were left in place to be dealt with at a later time do to their locations inside the building and relationship to building structures. CH2M Hill also stated that contaminated soils were used as backfill for USTs 1, 3, 4, 7, 8, 9, and 10.

Sampling for the PI/PII process was poorly documented and did not follow MTCA Table 830-1 sampling guidelines. Lab reports were not always included with the documents provided and therefore all reported analytical results could not be verified. No groundwater samples other than the ones taken from the process water supply wells were collected.

[8] Lambier Stevenson Engineers, December 11, 1989, p. 6.
[9] CH2M Hill, March 1990, p. 15.

Removal of USTs 2 and 5 (March 1990 through February 1993)
A memorandum is included as part of a letter from CH2M Hill to Mr Victor Ehrlich of the City of Vancouver that details the additional efforts conducted to remove USTs 2 and 5. USTs 2 and 5 were removed in March 1990. Contaminated soils associated with both tanks were left in place due to restrictions associated with the building. These soils were identified as exceeding the Ecology standards, but do not appear to have been sampled. Sometime prior to February 1993, the building in the vicinity of T2 had been removed and CH2M Hill conducted further excavation. High TPH-D concentrations (12,000 mg/Kg and 4,200 mg/Kg) were observed in samples collected from a test pit, and additional excavation was conducted to remove the contaminated soil. Five confirmation soil samples are reported. One soil sample from each side wall and one soil sample from the floor of the excavation. Reportedly, all samples were below the method detection limits for diesel. Detection limits for diesel ranged from 20 to 27 mg/Kg. Laboratory reports were indicated but not included in the letter provided to Ecology. No additional excavation of the soils associated with Tank 5 were mentioned.

Groundwater Sampling (April 1995)
Groundwater sampling was conducted at the adjacent Site located at 4200 SE Columbia Way by AGRA Earth & Environmental, Inc. in April 1995. Four groundwater grab samples were collected from Geoprobe borings using a bailer. Analysis included volatile organic compounds (VOC), and a single total petroleum hydrocarbons (TPH) analysis. One groundwater sample (GP2-H2O) showed a xylene concentration of 1.26 µg/L. The one TPH sample (GP2-H2O) showed a TPH-G concentration of <20 µg/L, a TPH-D/O concentration of 360 µg/L. Two of the groundwater samples showed tetrachloroethene (PCE) concentrations; GP1-H2O showed a PCE concentration of 2.1 µg/L, and GP2-H20 showed a PCE concentration of 1.4 µg/L. The PCE results are believed to be from a "well documented PCE groundwater contaminate plume present in the area of Water Station #4"[10]. This Water Station #4 locations appears to be the Vancouver City Blandford Station 4 Site (FSID 202), which is an EPA Superfund Site.

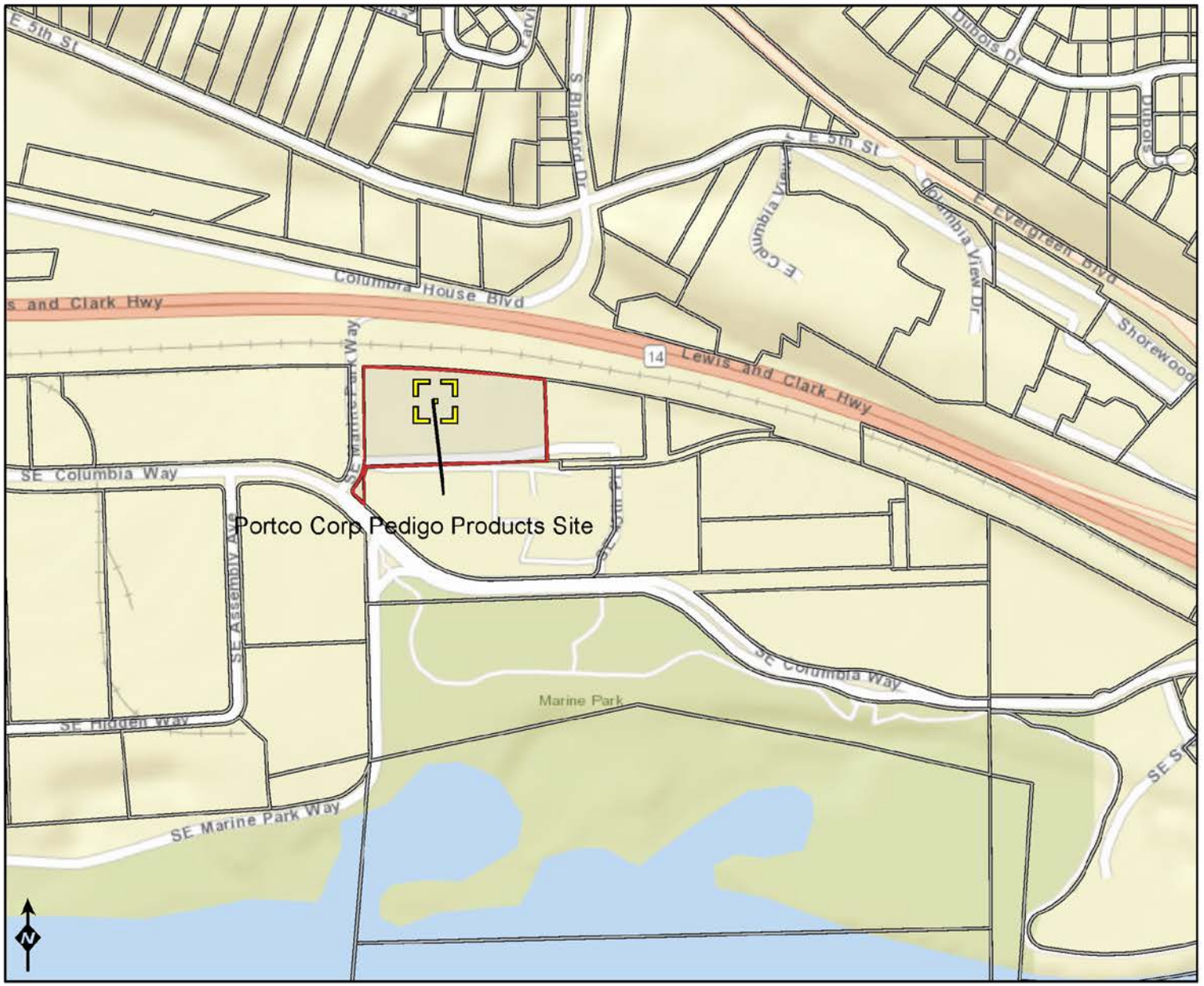
Additional Phase I Environmental Site Assessment (June 1995)
An additional PI ESA was conducted by AGRA Earth & Environmental, Inc. in June 1995 for Union Central Life Insurance Company. This PI was done for the 4000 S.E. Columbia Way property (this Site). The PI reports that the neighboring 4200 S.E. Columbia Way Site still has registered UST and is on the Confirmed or Suspected Contaminated Sites List (CSCSL). No significant environmental issues are noted on this Site.

Independent Remedial Action Report (June 1996)
An Independent Remedial Action Report (IRAP) was submitted by AGRA Earth & Environmental, Inc. that summarized the work performed on both the 4000 and 4200 S.E. Columbia Way properties and requests a no further action determination from Ecology for both properties.

[10] AGRA Earth & Environmental, Inc., April 1995, p. 4.

Site Diagrams

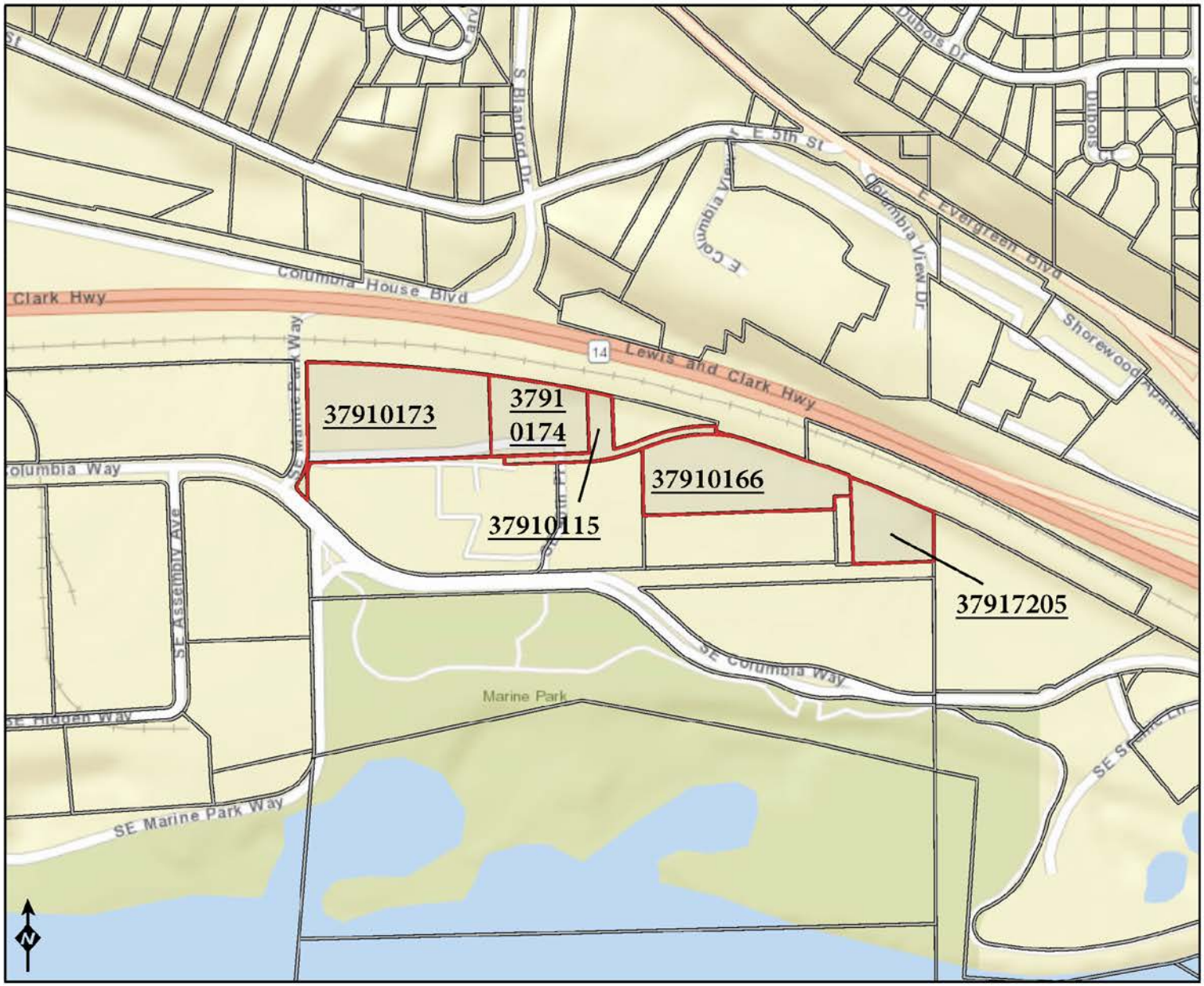
Ecology Figure 1; Portco Corp Pedigo Products Site Location Map



Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User

DEPARTMENT OF ECOLOGY
State of Washington

Ecology Figure 2; Parcel Map



Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User

DEPARTMENT OF ECOLOGY
State of Washington

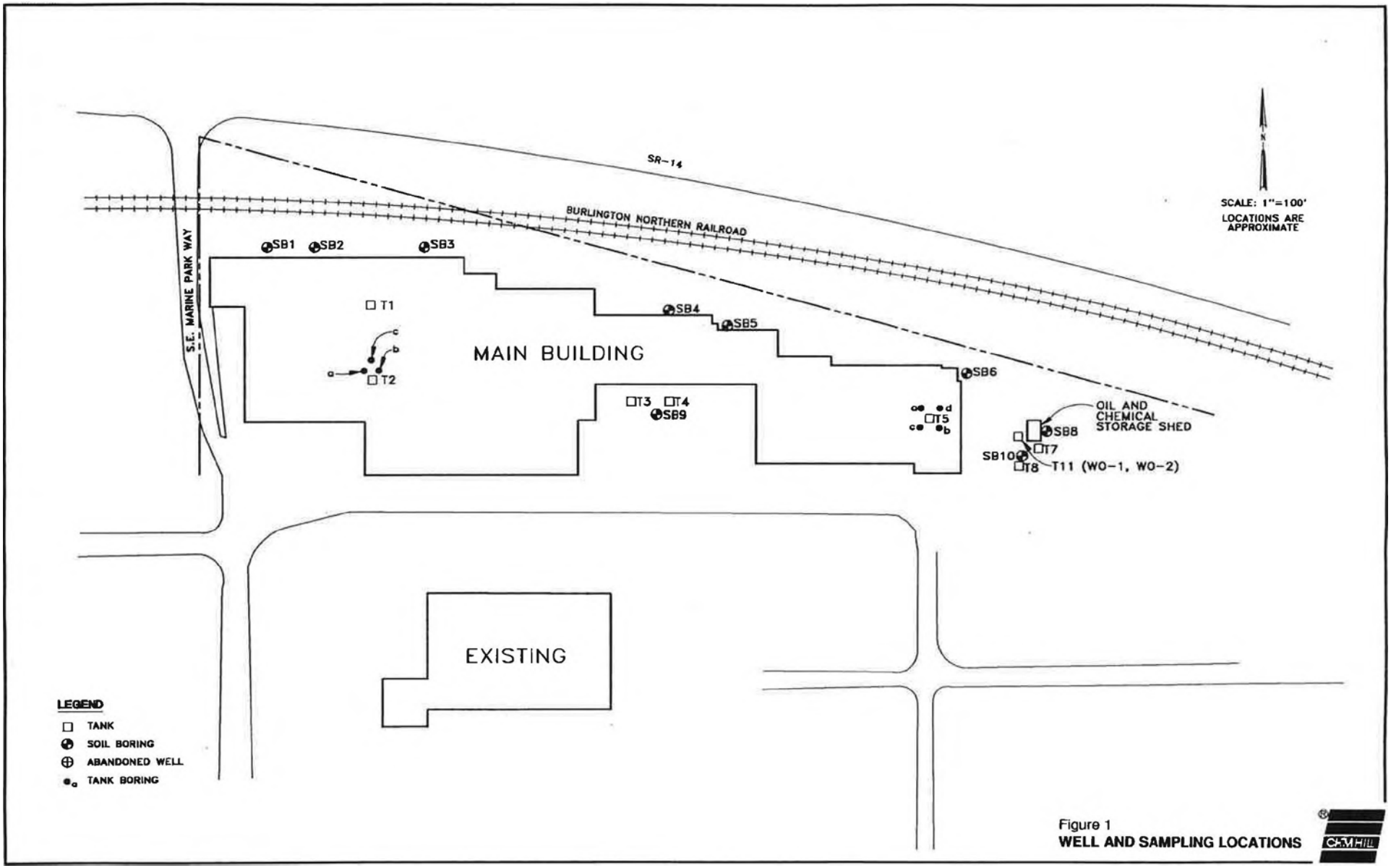


Figure 1
WELL AND SAMPLING LOCATIONS

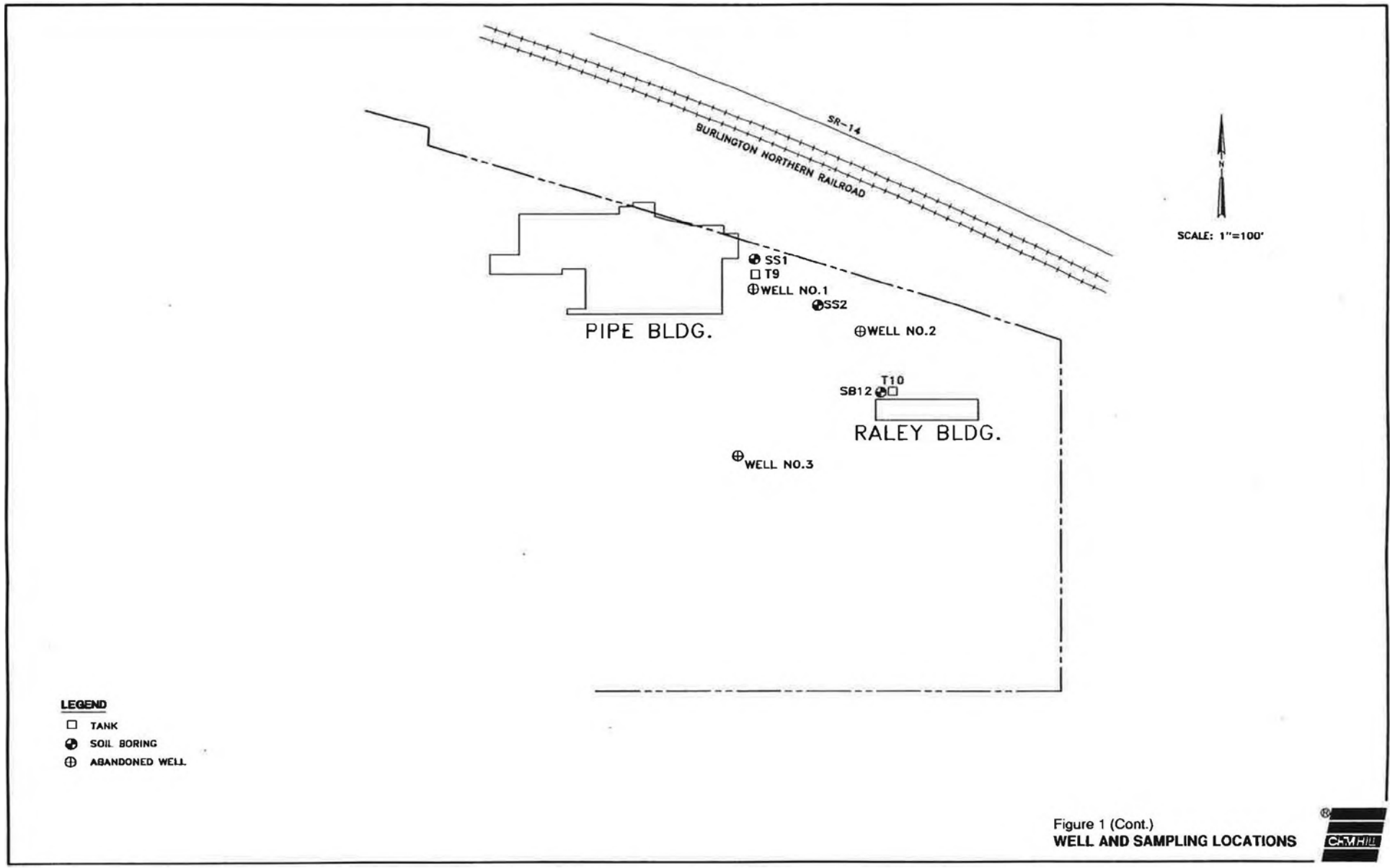


Figure 1 (Cont.)
WELL AND SAMPLING LOCATIONS

Site Tables

Ecology Table 1
Ecology Assessment of Petroleum Tanks (UST and AST) Associated with the Portco Sites[#]

Tank ID*	Associated Address	Associated Parcel ID (Clark Co.)	Tank Capacity (gal)	Reported Tank Contents	Associated Samples** or Location Designations	Reported Contamination Levels (mg/Kg)	Backfilled with Contaminated Soils	Notes
T6	Unknown	Unknown	500 - 999[(1)]	No. 1, 2,or 4 Fuel[(1)]		Unknown	Unknown	Believed to have been removed prior to the other tanks[(2)]. No visual evidence of the tank noticed[(3)]. GPR may be necessary to determine tanks actual removal status.
T1	4000	37910173	10,000 - 19,999[(1)] 1,600[(3)]	Furnace and Boiler Fuel[(2)]; No. 1, 2,or 4 Fuel[(1)]; Diesel/Boiler Fuel[(3)]	T1-EE	TPH; 8[(3)]	YES	Insificent samples taken - Only one at east end of excavation NO VOCs
T2	4000	37910173	1,000 - 4,999[(1)] 1,000[(3)]	Furnace and Boiler Fuel[(2)]; No. 1, 2,or 4 Fuel[(1)]; Diesel[(3)]	T2a, T2b, T2c, T2SW, T2f, T49, T2e, T-17, T-33, T-34, T-37, T-38, T-42, T-43, S-1, S-2, two unknown samples taken from final excavation of PCS	TPH; 4,630[(2)] TPH; ND @T2b, 21 @T2c, 1600 @T2SW[(3)] TPH; 181[(4)], 20[(4)] TPH; 20 to 27[(5)]	Unknown	NO VOCs from excavation. (4) indicates that "A small quantity of soil (approximately 5 cubic yards) in excess of Ecology standards possibly remains under supporting walls at this location." [p. 2 of included Memo] (5) "It is our understanding that the contractor will coordinate treatment and/or off-site disposal of the excavated contaminated soil." [p. 4] It is not know what became of these soils.
T3	4000	37910173	500 - 999[(1)] 2,000[(3)]	Unknown Fuel[(2)]; No. 1, 2,or 4 Fuel[(1)]; Gasoline[(3)]	SB9, (Tank 1)	BTEX; ND[(3)]	YES	NO TPH from excavation. SB9 was the final excavation sample taken at 15-16 ft bgs for T3 & T4 and was ND for BTEX.
T4	4000	37910173	500 - 999[(1)] 2,000[(3)]	Unknown Fuel[(2)]; Leaded Gasoline[(1)]; Gasoline[(3)]	SB9, (Tank 2)	BTEX; 6,800[(3)]	YES	NO TPH from excavation. SB9 was the final excavation sample taken at 15-16 ft bgs for T3 & T4 and was ND for BTEX.
T5	4200	37910174	500 - 999[(1)] 1,600[(3)]	Furnace and Boiler Fuel[(2)]; Leaded Gasoline[(1)]; Diesel/Boiler Fuel[(3)]; Bunker C or D[(4)]	T5a, T5b, T5c, T5d, T50, T5e, T-51, T5f, T-52, T-53, T-15, T-16, T-44, T-45, T-46, T-47, T-48	TPH; 389 & 128[(2)] TPH; ND @T5c[(3)] TPH; 6,520 @T-51, 2,500 @T5f[(4)]	Unknown	NO VOCs from excavation.. (4) indicates that "An asphalt-like substance was observed coating a portion of the tank and appeared to have adhered the tank to the soil; removal required a jackhammer to loosen the tank from this material." [p. 2 of included Memo]
T7	4200	37910174 or 37910115	12,000[(2)] 12,000[(3)]	Diesel[(2)]; Bunker C[(3)]; Diesel[(3)]	B-9, SB8, SB10, T7-EF, T7-NEW	TPH; 119[(2)] TPH & VOC; ND[(3)]	YES	Stockpiled soils with 2,000 mg/Kg TPH were segrated, soils with 206 to 257 mg/Kg TPH were used as backfill.
T8	4200	37910174 or 37910115	2,000[(3)]	Diesel[(3)]; Gasoline[(3)]	SB10	BTEX; ND[(3)]	YES	NO TPH from excavation, no excavation confirmation samples
T11	4200	37910174 or 37910115	1,000[(3)]	Waste Oil[(3)]	WO-1C, WO-2E	TPH; ND[(3)], BTEX ND[(3)]	Unknown	Aboveground Storage Tank
T9	No Address Associated with this Parcel	37910166	12000[(2)] 1,750[(3)]	Heating frunace fuel[(2)]; Diesel/Boiler Fuel[(3)]	T-13, T-14, SS1, T9G	TPH; ND[(2)] TPH; 51, 124 Excavation Confirmation 1,900 Stockpile[(3)]	YES	A lot of effort was done to devide and mix the stockpile to get the TPH levels to below 200 mg/Kg. Was this done to reuse the soils as backfill?
T10	4650	37917205	1,000[(3)]	Gasoline[(3)]	SB12	BTEX; ND[(3)]	YES	NO TPH from excavation, no excavation confirmation samples

[#] Portco Sites Consist of Portco Corp Pedigo Products (FSID30759) located at 4000 SE Columbia Way, and Portco Corporation Polyethelyene Div (FSID98588242) located at 4200 SE Columbia Way. Some tanks are no longer associated with these locations and addresses.

* Reporting of Tank IDs was inconsistent across the submitted reports. Sample IDs may or may not include hyphens '-'. For example, T2 is assumed to be the same as T-2.

** Reporting of Sample IDs and location designations was inconsistent across the submitted reports. Sample IDs may or may not include hyphens '-'. For example, T-45 is assumed to be the same sample as T45, and T-2f is assumed to be the same sample as T2f.

blue Indicates a lab report varified sample ID or result. For sample IDs, this may NOT contain the entire depth series. For example T5c 8-10 ft. bgs and T5c 14-15 ft. bgs may not both have been submitted to Ecology.

(1) CH2M Hill, Technical Memorandum to the City of Vancouver; Phase I Environmental Survey; Eastside Treatment Plant Expansion; Expansion Option A, September 22, 1989.
(2) Lambier Stevenson Engineers, Phase II Site Assessment of the Portco Property, December 11, 1989.
(3) CH2M Hill, Phase II Environmental Assessment Survey, March 1990.
(4) CH2M Hill, Letter to Mr. Richard Walker, LUST Site Manager, Department of Ecology, Subject: Portco Property Environmental Assessments, April 10, 1990.
(5) CH2M Hill, Letter to Mr. Jerry King, City Attorney, City of Vancouver, Re: Additional Soil Excavation at Former Tank T-2 Location, March 16, 1993.

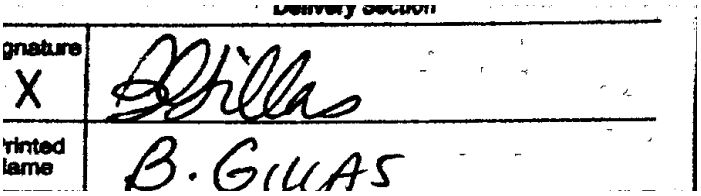
UNITED STATES POSTAL SERVICE

Date: May 23, 2018

Dept of Ecology:

The following is in response to your May 23, 2018 request for delivery information on your Certified Mail™ item number 9171999991703775200858. The delivery record shows that this item was delivered on February 20, 2018 at 11:40 am in VANCOUVER, WA 98661. The scanned image of the recipient information is provided below.

Signature of Recipient :



Address of Recipient :

Thank you for selecting the Postal Service for your mailing needs.

If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,
United States Postal Service