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Dianne K. Conway
Direct: (253) 620-6523
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RECEIVED

NOV 12 2008

Washington State
Department of Ecology

November 10, 2008

Marv Coleman
Washington Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Re: **Titus Chevrolet/Stadium Thriftway Property, Tacoma**

Dear Marv:

I represent Morrell's Cleaners, a dry-cleaning business located at 608 North First Street in Tacoma. Morrell's Cleaners recently received laboratory data from the owners of the property on which it operates as well as another operator on the property that indicates that there have been historical releases of hazardous substances at the property. Since the owners and other operators have apparently decided not to provide this data to Ecology themselves, I am enclosing this data pursuant to WAC 173-340-300 (2)(a). I am also enclosing other environmental reports done for Walker Chevrolet, a prior operator at the property.

As you will see from the attached site map, the property at issue is a triangular parcel in the middle of Tacoma's Stadium District. The current owners of the property are Dave and Barbara Shaw, Darrell Wickham, and Zona Wickham. It is my understanding that they have owned the property for many decades. The main building is currently occupied by Bruce Titus Chevrolet and Stadium Thriftway. Friendly Chevrolet and Walker Chevrolet previously had operations in the main building. Morrell's Cleaners is located in a small building that faces North First Street where it has operated in this building since 1971; Stadium Thriftway also rents space in this building. Other dry-cleaning businesses operated in the building since at least the 1920s.

As you will see, the recent laboratory data came from a site investigation done by Stemen Environmental at the request of Stadium Property Associates LLC. At least two of the members

GORDON, THOMAS, HONEYWELL,
MALANCA, PETERSON & DAHEIM LLP

Marv Coleman
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Page 2

of this LLC, Mike Hargreaves and Bruce Titus, are the respective owners of Stadium Thriftway and Titus Chevrolet. It is our understanding that the LLC wished to purchase the property, which led to the recent investigation. I have also enclosed a Phase I report and closure report prepared by Bison Environmental for Walker Chevrolet in 1994.

shaw/wickham?
The owners are represented by Mark C. Vohr at Aiken, St. Luis & Siljeg in Seattle. Stadium Property Associates LLC and its members are represented by Scott Easter and Jeffrey Lee Péwé of Montgomery Purdue Blankinship & Austin and Bill Joyce of Salter Joyce Ziker PLLC.

On a final note, I wish to emphasize that my client does not agree that the methodology used or data obtained by Stemen Environmental is in fact accurate. Indeed, it has serious concerns regarding both. It merely seeks to fulfill its regulatory obligation since the owners and other operators have failed to do so.

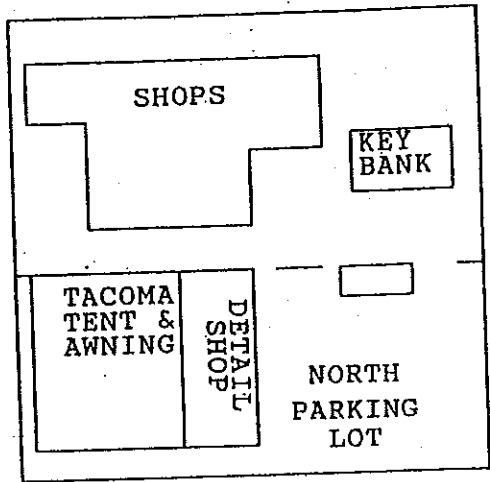
Very truly yours,



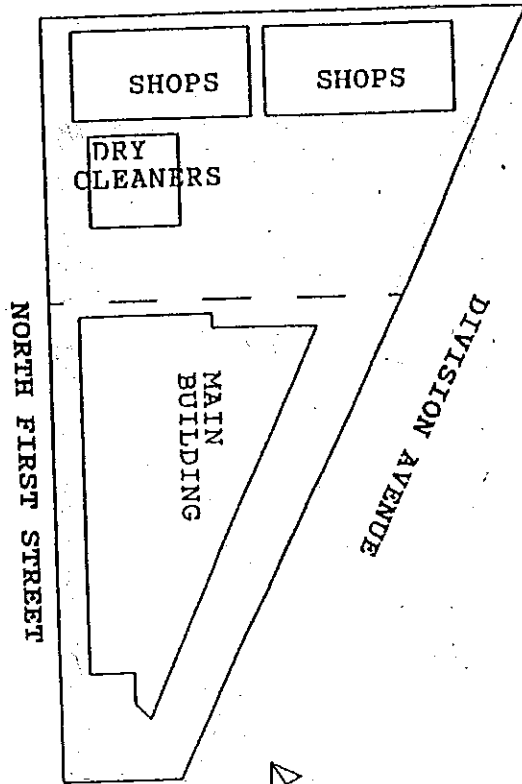
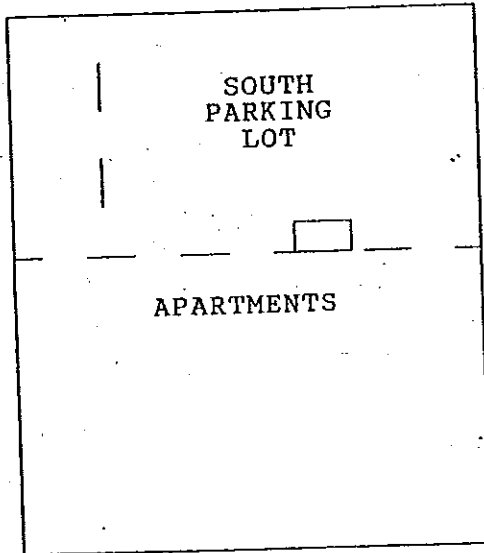
Dianne K. Conway

DKC:sit
Enclosures
cc: Linda Morrell

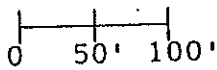
TACOMA AVENUE



NORTH "G" STREET



SCALE



SITE PLAN
BISON ENVIRONMENTAL NORTHWEST, INC.
PROJECT# 94481 AUGUST 1994

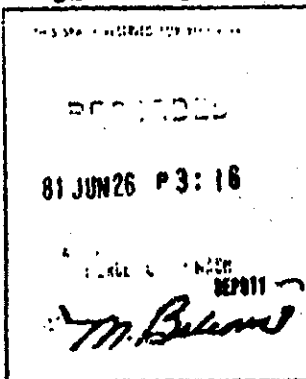




8106260307

VOL 043 PAGE 1209

REVENUE STAMPS



AFTER RECORDING MAIL TO:

Four horizontal lines for recipient information.

Form L99

Statutory Warranty Deed

THE GRANTOR **LESLIE R. FITE**, a single man,

for and in consideration of the sum of Ten Dollars (\$10.00) and other good and valuable consideration in hand paid, conveys and warrants to **DARRELL E. WICKHAM and ZONA WICKHAM, husband and wife, and DAVID C. SHAW and BARBARA SHAW, husband and wife,** the following described real estate, situated in the County of **Pierce**, State of Washington

For legal description, see Exhibit "A" attached hereto

547917 4850⁰⁰
6-26-81
Leslie R. Fite

Dated this 19th

day of **JUNE**, 1981.

Leslie R. Fite (REAL)
LESLIE R. FITE (REAL)

STATE OF WASHINGTON,
County of **Pierce**

On this day personally appeared before me **LESLIE R. FITE**, a single man, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that he signed the same as his wife and voluntarily act and deed, for the uses and purposes therein mentioned

GIVEN under my hand and official seal this 19th day of **JUNE**, 1981

[Signature]
Notary Public for the State of Washington,
residing at *[Signature]*

PIERCE COUNTY, WA
9809100407
9-10-1998 11:32 am
Fee Amt: \$10.00

Return Address:

MARSHALL D. ADAMS
Attorney at Law
2115 No. 30th, Ste 203
Tacoma, WA 98403

Document title(s) (or transactions): QUIT CLAIM DEED
Grantor(s) (Last name first; then first name & initials): WICKHAM, DARRELL E. Additional names on page ____ of document
Grantee(s) (Last name first, then first name & initials): WICKHAM, Darrell E. & WICKHAM, Lois J. Additional names on page ____ of document
Legal description (abbreviated): BLOCKS 3012, 3013 & 3014, MAP OF NEW TACOMA, WT, ETC. Legal description is on page 2 of document
Reference number(s) (of documents assigned or released): Additional reference numbers on page ____ of document
Assessor's Property Tax Parcel/Account Number: 203012-004-0

ETN: 976366 9-8-1998
Excise Tax Collected: \$0.00
Affidavit Processing Fee: \$2.00
Cathy Pearsall-Stipek CFO Pierce County Auditor
BY: LISA DRURY

9809100407

EXHIBIT "A"

PARCEL A:

All of Blocks 3012, 3013, and 3014, MAP OF NEW TACOMA, WASHINGTON TERRITORY, according to plat filed for record February 3, 1875, in the office of the County Auditor. TOGETHER with that portion of North "G" Street lying between said Blocks 3013 and 3014 vacated by Ordinance No. 65 of the City of Tacoma, and that portion of alley lying between said Blocks 3012 and 3013 vacated by Ordinance No. 106 of the City of Tacoma. EXCEPT the following described property: Beginning at the most northerly corner of Block 3012, said plat; thence on the westerly line of said Block south 25°30' west 78.80 feet; thence parallel to the northerly line of said Block south 64°30' east 179.56 feet; thence south 76°07' east 58.74 feet to the easterly line of said Block; thence on said easterly line north 53°20' east 75.71 feet to said northerly line of Block; thence north 64°30' west 272.49 feet to the point of beginning.

PARCEL B:

Together with a non-exclusive easement over a strip of land 15.00 feet in width for ingress and egress over the following described tract of land: Commencing at the most northerly corner of Block 3012, said plat; thence on the westerly line of said Block south 25°30' west 71.30 feet to the point of beginning; thence parallel to the northerly line of said Block south 64°30' east 178.80 feet; thence south 76°07' east 64.15 feet to the easterly line of said block; thence on said easterly line south 53°20' west 19.42 feet; thence north 76°07' west 53.33 feet; thence north 64°30' west 180.32 feet; thence north 25°30' east 15 feet to the point of beginning. EXCEPTING from said easement that portion thereof lying with Parcel A.

9809100407



FLOYD | SNIDER

strategy • science • engineering

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October 23, 2008

Dianne Conway, Esq.
Gordon Thomas Honeywell
P.O. Box 1157
Tacoma WA 98401-1151

**SUBJECT: REVIEW OF INDOOR AIR SAMPLING DATA, MORRELL'S DRY CLEANERS,
TACOMA WA**

Dear Ms. Conway:

At your request, Floyd|Snider reviewed the information provided to us concerning the above-referenced site. Information reviewed included:

1. A letter dated September 30, 2008 from Aspect Consulting to Stadium Thriftway LLC titled "Summary of Indoor Air and Soil Gas Sampling Results, North First Street Parcels, Tacoma Washington."
2. A letter dated July 30 2008 from William Joyce to Linda Morrell concerning Notice of Remedial Actions, Stadium Property Associates LLC, including enclosed data package.

After reviewing the above, Floyd|Snider has the following observations:

The enclosed information provided in Item 2 above (letter from William Joyce) contained no detail or description of the sampling purpose or methodology, making the validity and usefulness of the data suspect. This is especially true for the following samples:

- Soil gas vapor samples GV-1 through GV-6 collected 5/8/08)
- Soil samples (PB, S, and DC series) collected 8/31/06
- Soil samples (B and T series) collected 6/29/07
- Soil samples (D series) collected 2/3/08 through 2/9/08
- Soil samples (TS and ND series) collected 7/24/07 and 2/3/08 through 2/9/08
- Soil samples (F and R series) collected 7/31/07
- Air samples labeled Back Bakery, Front Bakery, and Back Office collected 2/8/08

For all these samples, the analytical results were provided on data sheets without the name of the laboratory that conducted the analysis. This is highly unusual and not standard industry practice. Floyd|Snider cannot provide further comment on these lab reports until proper documentation of the sampling is provided, including a review of the data quality control and assurance. Proper and rigorously documented sampling techniques are especially important

given to the American Conference of Governmental Industrial Hygienists (ACGIH) and the National Institute for Occupational Safety and Health (NIOSH) recommended alternative protective concentrations. The following table cites the more applicable air standards for PCE, which is also known as tetrachloroethylene:

Agent Name	Tetrachloroethylene
Alternative Name	Perchloroethylene
CAS Number	127-18-4
Formula	C2-Cl4
TLV (ACGIH)	25 ppm (equivalent to 169,581 $\mu\text{g}/\text{m}^3$)
STEL (ACGIH)	100 ppm (equivalent to 678,323 $\mu\text{g}/\text{m}^3$)
PEL (OSHA)	100 ppm (equivalent to 678,323 $\mu\text{g}/\text{m}^3$)

Source: <http://hazmap.nlm.nih.gov>

Notes:

- PEL Permissible exposure limit
- PPM Parts per million
- STEL Short-term exposure limit
- TLV Time-weighted average

The highest PCE concentration detected in the indoor air samples was 2,749 $\mu\text{g}/\text{m}^3$. This is equivalent to 0.4 parts per million by volume (ppmv), which is less than 1% of the OSHA limit of 100 ppm and less than 2% of the recommended ACGIH concentration of 25 ppmv. Therefore, the concentrations reported by Stemen Environmental are well within applicable regulatory guidelines set for worker protection.

Without better detailed sampling, Aspect Consulting has no technical basis for stating, "The soil vapor intrusion may also contribute significantly to the elevated concentrations inside the office and former bakery." An equally valid statement would be, "Soil vapor intrusion may not contribute significantly to the elevated concentrations in the office and former bakery." Also, the use of PCE as a dry cleaning solvent will be terminated in the near future. Only after that termination, following an appropriately detailed sampling program, should the issue of the soil vapor intrusion pathway be examined.

Concerning the presence of benzene, Aspect Consulting stated, "It is unlikely that soil vapor intrusion was primarily responsible for the benzene detections in indoor air." As benzene is not a chemical used in the dry cleaning process, further consideration of the Morrell Cleaners as a source of this chemical is unnecessary, especially given the fact that other sources of benzene may be close by (e.g., the active auto dealership on this property).

As noted above, it does not appear that background air or similar control samples were collected, which further complicates the data interpretation. Urban air contains a variety of industrial compounds, including volatile organic compounds (VOCs), often at significant levels.



Pierce County Assessor-Treasurer
 electronic Property
 Information Profile (e-PIP)



Ken Madsen
 Assessor-Treasurer



Pierce County Home Assessor-Treasurer Home Parcel Search Sales Search Recorded Documents Permit
 Summary Taxes/Values Land Buildings Sales Map

Parcel Summary for 2030120030

11/12/

Taxpayer Details

Taxpayer Name: WALKER CHEVROLET COMPANY
Mailing Address: 608 N 1ST ST
 TACOMA WA 98403

Property Details

Parcel Number: 2030120030
Site Address: 608 TO 610 N 1ST
Account Type: Real Property
Category: Land and Improvements
Use Code: 5390-OLDER BUSINESS DIST

Appraisal Details

Value Area: PI Year 5
Appr Acct Type: Commercial
Business Name: MORRELL'S CLEANERS / ESPRESSO

Tax/Assessment

Current Tax Year: 2009
Taxable Value: 555,600
Assessed Value: 555,600

Related Parcels

Group Account Number: n/a
Mobile/MFG Home and Personal Property 2005317000 2006053560
 parcel(s) located on this parcel:
Real parcel on which this parcel is located: n/a

Tax Description

Section 32 Township 21 Range 03 Quarter 42 : NEW TACOMA PART OF BLK 3012 & VAC ALLEY ADJ DESC AS FOLL CC-
 NLY COR B 3012 TH SWLY ALG THE NWLY LI 78.80 FT TO POB TH CONT SWLY ALG SD LI 61 FT TH SELY PAR/W NELY
 FT TH NELY PAR/W NWLY LI 61 FT TH NWLY 80 FT TO POB SE 32 21 3E SEG F 9220

I acknowledge and agree to the prohibitions listed in RCW 42.17.260(9) against releasing and/or using lists of individual commercial purposes. Neither Pierce County nor the Assessor-Treasurer warrants the accuracy, reliability or timeliness of any information system, and shall not be held liable for losses caused by using this information. Portions of this information may not be current or a person or entity who relies on any information obtained from this system, does so at their own risk. **All critical information should be independently verified.**

Pierce County Assessor-Treasurer
Ken Madsen
 2401 South 35th St Room 142
 Tacoma, Washington 98409
 (253)798-6111 or Fax (253)798-3142
 www.piercecountywa.org/atr

(c) 2008 Pierce County Assessor-Treasurer



Pierce County Assessor-Treasurer
 electronic Property
 Information Profile (e-PIP)



Ken Madsen
 Assessor-Treasurer

Pierce County Home Assessor-Treasurer Home Parcel Search Sales Search Recorded Documents Permit
 Summary Taxes/Values Land Buildings Sales Map

Parcel Summary for 2030120040

11/12/

Taxpayer Details

Taxpayer Name: SHAW D C & B/WICKHAM D E TTEE/Z
 WICKHAM
Mailing Address: 633 DIVISION AVE
 TACOMA WA 98403-3126

Property Details

Parcel Number: 2030120040
Site Address: 633 DIVISION AV
Account Type: Real Property
Category: Land and Improvements
Use Code: 5515-AUTO DLR NEW AND USE

Appraisal Details

Value Area: PI Year-5
Appr Acct Type: Commercial
Business Name: FRIENDLY CHEVROLET / STADIUM
 THRIFTWAY

Tax/Assessment

Current Tax Year: 2009
Taxable Value: 4,586,400
Assessed Value: 4,586,400

Related Parcels

Group Account Number: n/a
Mobile/MFG Home and Personal Property 2009731000 2896003107
 parcel(s) located on this parcel:
Real parcel on which this parcel is located: n/a

Tax Description

Section 32 Township 21 Range 03 Quarter 42 : NEW TACOMA ALL OF BLKS 3012, 3013 & 3014 TOG/W VAC N G ST & ALLEY VAC EXC FOLL DESC PROP BEG AT MOST NLY COR OF B 3012 TH ALG NWLY LI SD BLK S 25 DEG 30 MIN W 78 REF PT A TH CONT SWLY ALG NWLY LI OF SD BLK & VAC ALLEY 61 FT TH SELY PAR/W NELY LI SD BLK 80 FT TH NEL NWLY LI 61 FT TH SELY PAR/W NELY LI OF SD BLK TO A PT S 64 DEG 30 MIN E 179.56 FT FROM REF PT A TH S 76 D 58.74 FT TO ELY LI OF SD BLK TH ON SD ELY LI N 53 DEG 20 MIN E 75.71 FT TO NELY LI OF SD BLK TH N 64 DEG 30 272.49 FT TO BEG TOG/W POR VAC PER ORD #25654 OF SELY 5.2 FT OF N 1ST ST LY NWLY OF AND ABUTT L 1 B 30 48,284 SQ FT EASE OF RESERV OF REC SEG F-9220 DC09/22/95CL

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