



# Converse Consultants

Geotechnical Engineering, Environmental & Groundwater Science, Inspection & Testing Services

August 30, 2018

Mr. Nicholas Acklam  
VCP/II-SHA/LUST Unit Supervisor  
Toxics Cleanup Program - Southwest Regional Office  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, Washington 98503

**Subject: VCP Application Revision – Request for Written Opinion**  
Point Fosdick Square  
4829 Pt. Fosdick Dr. NW  
Gig Harbor, Washington 98335  
VCP Project ID: SW1645  
Converse Project No. 17-42-200-06

Mr. Acklam:

Converse Consultants (Converse) recently enrolled the above referenced property (Site) in the Department of Ecology (Ecology) Voluntary Cleanup Program (VCP). In our VCP Application we indicated that we were not requesting a written opinion at this time. However, based on addition information that we have received we would like to request a written opinion.

The document that we would like to receive a written opinion on is the Phase I Environmental Site Assessment (ESA) Report, dated February 18, 2018, prepared by Property Solutions Inc (PSI). It is noted that other relevant documents prepared by Environmental Partners Inc. (EPI) are included in Appendix E of the 2018 PSI Phase I ESA report including a Soil Remediation and Disposal letter, dated July 11, 2011, and a Remedial Action Report, dated October 7, 2011. Additional supporting documents have also previously been submitted to Ecology.

In their Phase I ESA Report PSI concludes that a limited subsurface investigation should be conducted unless further documentation is provided regarding certain Site features. Following the completion of that report our client has reached out to various parties to obtain the desired additional information. Based on this additional information Converse is of the opinion that no further assessment is warranted. To aid Ecology in your review of the document and preparation of your opinion, Converse is presenting below the conclusions and recommendations from the PSI Phase I ESA report (in italics) with our comments (in red) based on recently obtained data.

*This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property except for the following:*

*A drawing entitled Demolition Plan – Northwest Portion, Point Fosdick Square dated January 11, 2011 [Previously submitted to Ecology], identifies an oil-water separator that was “To be removed during Phase 2” and a grease trap that was also “To be removed during Phase 2.” These features were located outside the northeast corner of the former building that was located in the westcentral portion of the historic property. Construction Sequence note 8 on the plan refers to a “drain field” located east of the then-existing buildings, and states that Health Department approval may be necessary for work in that area. Reference to the Health Department suggests that the drain field received sanitary waste. [The reference was couched with “may”, which suggests that it might have been unknown if the drain field received sanitary waste, or that DEH approval could be needed if contamination indicators were observed.] Property Solutions was provided with no closure documentation regarding these features. [Regulatory oversight is not believed to be required for the abandonment of these types of features (unless contamination is present), so it is unlikely that any type of closure documentation was ever generated.]*

*The available information does not identify the tenant or operations that would have involved the use of an oil-water separator. A response from the Tacoma-Pierce Health Department – Environmental Health Division is pending. No information was provided that reveals whether the historic dry cleaner discussed below may have contributed to the flow to the drain field.*

*Property Solutions recommends that documentation be provided with regard to the closure or current status of the separator, trap, and drain field. [The contractor involved with the demo work has indicated that no evidence of contamination was identified, and that he doesn’t recall encountering anything (structures or signs contaminant indicators) in the area where the drain field was reportedly located. Since no signs of contamination were observed, no regulatory agency was informed of their removal. Therefore, the current status of the grease trap and oil water separator is that they were removed, and no documentation was generated. It is unknown if a drain field was actually present on the Site as indicated on the demo plan. If it had been, it was also removed, but no signs of contamination were identified.] Whether the historic dry cleaner contributed to the flow to the drain field should also be investigated. If the historic dry cleaner contributed to the flow to the drain field and the drain field remains [The eastern area of the site was developed. If a drain field had existed there, it no longer remains. No indications of contamination were reported by the contractor who developed this area.] or was not investigated, a Limited Subsurface Investigation should be conducted in that area. [Not considered necessary since no indications of contamination were observed by the contractor during redevelopment of the eastern portion of the site.]*

*The following Historical recognized environmental condition (HREC) was identified at the subject property based on the findings provided in this report:*

*The subject property was developed with commercial/retail buildings in the mid-1970s. Those buildings were demolished in preparation for construction of the present-day improvements in*

*2011-2012. Establishments at the historic property included a PCE dry cleaner (Point Fosdick Cleaners Inc.) located at 4829 Point Fosdick Drive Northwest between 1993 and 2010. Point Fosdick Cleaners Inc. was reportedly located in the present-day parking lot, approximately 110 feet from the nearest present-day building.*

*A Phase I Environmental Site Assessment report prepared by Environmental Partners Inc. and dated November 25, 2014, refers to Point Fosdick Cleaners Inc. as an HREC on the basis of the findings of a Subsurface Investigation Letter Report dated February 15, 2011, and a soil removal action documented in a Remedial Action Report dated October 7, 2011. The Subsurface Investigation and Remedial Action were performed pursuant to the findings presented in an Environmental Audit and Limited Phase II Environmental Assessment report dated June 10, 2008. In addition, a Phase I Environmental Site Assessment report prepared by Converse Consultants and dated February 7, 2018, discusses the soil removal action at the Point Fosdick Cleaners Inc., but does not identify the soil removal action as a REC or HREC. [Converse did however recommend that prior reports be obtained and that agency closure be achieved or confirmed for the former dry cleaner clean-up.] The Subsurface Investigation Letter Report was not provided to Property Solutions.*

*Point Fosdick Cleaners Inc. is not listed on the Washington Department of Ecology (Ecology) databases provided to Property Solutions by EDR. Property Solutions did not identify Point Fosdick Cleaners Inc. on the Ecology online Facility/Site database or the Cleanup Site database. The Phase I Environmental Site Assessment reports of November 25, 2014, and February 7, 2018, make no reference to Ecology involvement in the remedial action or Ecology's determination of no further action. The reports provided to Property Solutions include a letter from Ecology dated March 30, 2011, in which Ecology determined the classification disposal of the soil that was excavated during the remedial action. Nicholas M. Acklam, VCP/II-SHA/LUST Unit Supervisor in the Toxics Cleanup Program (Ecology Southwest Regional Office) confirmed to Property Solutions that the remedial action was not performed within the VCP.*

*Property Solutions recommends that a complete copy of the Subsurface Investigation Letter Report be provided. [A copy of this report was previously submitted to Ecology.] If no further action status for the dry cleaner is desired from Ecology, the property owner would have to enter the VCP and obtain the necessary releases from the parties that prepared the prior reports. [The Site has been entered into the VCP, and a determination of no further action with regard to the former cleaners and other Site features is being requested.]*

It is noted that groundwater beneath the Site was not previously assessed, and was not encountered at maximum depths previously explored of 48 feet bgs. Based on the depth to water, the remedial activities completed, and lack of contaminants reported in soils remaining onsite (in the 2011 assessment PCE was detected in 2 samples from 1-foot bgs, and those soils were subsequently removed). PCE was not detected in any of the other samples from 1-foot bgs, or in any of the deeper samples for 5.5 or 6 feet bgs), Converse believes that the potential for Groundwater to have been impacted by previous

Site related activities is low, and does not believe that any assessment of the groundwater is necessary.

Converse is requesting a written opinion regarding the Phase I ESA Report, dated February 18, 2018, prepared by Property Solutions Inc. We request that the Opinion specifically address the potential need for further action with regard to the following:

- Former onsite dry cleaner where remedial activities were completed
- Former grease trap that was removed during redevelopment
- Former oil-water separator that was removed during redevelopment
- Potential sanitary sewer drain field that was not identified during redevelopment
- Groundwater beneath the Site.

Should you have questions regarding this submittal please contact Michael Van Fleet at (626) 930-1267 or Norman Eke (626) 930-1260.

Sincerely,

**CONVERSE CONSULTANTS**



Michael Van Fleet, PG  
Senior Geologist



Norman Eke  
Managing Officer

Attch: VCP Request for Opinion Form

Dist: 1/Addressee via Electronic Mail  
1/Mr. Henry Avila via Electronic Mail



# Voluntary Cleanup Program

Washington State Department of Ecology  
Toxics Cleanup Program

## REQUEST FOR OPINION FORM

Use this form to request a written opinion on your planned or completed independent remedial action under the Voluntary Cleanup Program (VCP). Attach to this form the plans or reports documenting the remedial action. Please submit only one form for each request.

### Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are requesting a written opinion under the VCP. This information may be found on the VCP Agreement.

Facility/Site Name: Point Fosdick Square

Facility/Site Address: 4829 Pt. Fosdick Dr. NW, Gig Harbor WA 98335

Facility/Site No: 14418

VCP Project No.: SW1645

### Step 2: REQUEST WRITTEN OPINION ON PLAN OR REPORT

What type of independent remedial action plan or report are you submitting to Ecology for review under the VCP? Please check all that apply.

- Remedial investigation plan
- Remedial investigation report
- Feasibility study report
- Property cleanup\* plan (\* cleanup of one or more parcels located within the Site)
- Property cleanup\* report
- Site cleanup plan
- Site cleanup report
- Other – please specify: Phase I Environmental Site Assessment

Do you want Ecology to provide you with a written opinion on the planned or completed independent remedial action?

Yes  No

Please note that Ecology's opinion will be limited to:

- Whether the planned or completed remedial action at the site meets the substantive requirements of the Model Toxics Control Act (MTCA), and/or
- Whether further remedial action is necessary at the site under MTCA.

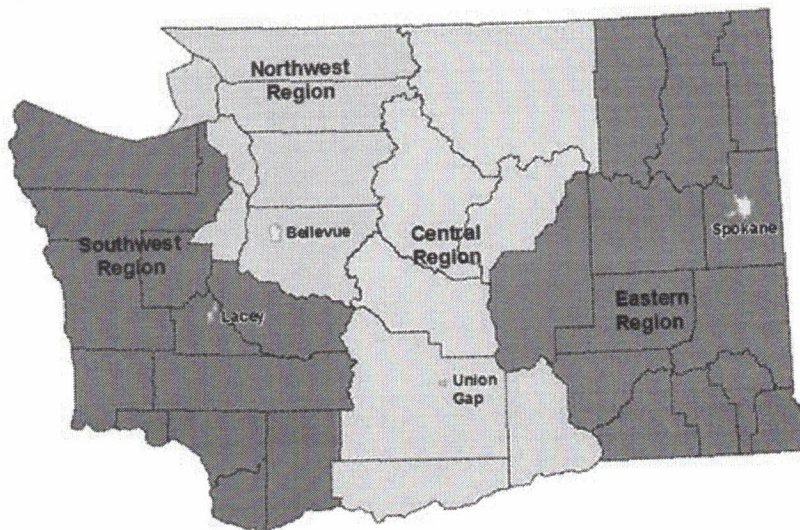
### Step 3: REPRESENTATIONS AND SIGNATURE

The undersigned representative of the Customer hereby certifies that he or she is fully authorized to request services from Ecology under the Agreement for this VCP Project.

Name: Michael Van Fleet		Title: Senior Geologist	
Signature: <i>Michael Van Fleet</i>		Date: 8-30-18	
Organization: Converse Consultants			
Mailing address: 717 S. Myrtle Avenue			
City: monrovia		State: CA	Zip code: 91016
Phone: 626-930-1200	Fax: 626-930-1212	E-mail: mvanfleet@converseconsultants.com	

### Step 4: SUBMITTAL

Please mail your completed form and the independent remedial action plan or report that you are requesting Ecology review to the site manager Ecology assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



<p><b>Northwest Region:</b> Attn: VCP Coordinator 3190 160<sup>th</sup> Ave. SE Bellevue, WA 98008-5452</p>	<p><b>Central Region:</b> Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009</p>
<p><b>Southwest Region:</b> Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775</p>	<p><b>Eastern Region:</b> Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295</p>

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

